



PROGRAM

ENVIRONMENTAL IMPACT REPORT

Project No. 104495
SCH No. 2006091032

SUBJECT: DRAFT GENERAL PLAN: CITY COUNCIL ADOPTION OF THE DRAFT GENERAL PLAN. The City of San Diego Draft General Plan is proposed to replace the existing 1979 *Progress Guide and General Plan* (1979 General Plan). The General Plan sets out a long-range, comprehensive framework for how the city will grow and develop, provide public services and maintain the qualities that define San Diego over the next 20-30 years. The proposed update has been guided by the City of Villages growth strategy and citywide policy direction contained within the General Plan Strategic Framework Element (adopted by the City Council on October 22, 2002). The Draft General Plan is comprised of an introductory Strategic Framework chapter and nine elements: Land Use and Community Planning; Mobility; Urban Design; Economic Prosperity; Public Facilities, Services and Safety; Recreation; Conservation; Noise; and Historic Preservation. The update to the Housing Element was adopted by the City Council under separate cover on December 5, 2006. Applicant: City Planning and Community Investment Department

UPDATE: In response to comments made on the Draft General Plan PEIR during the public review period, the City has undertaken the following actions to reduce the GHG emissions of future development and City operations under the General Plan and meet its obligations under CEQA to mitigate the cumulatively significant global warming impacts of the General Plan: (1) modify the policy language of the October 2006 Draft General Plan to expand and strengthen climate change policies; (2) ensure that policies to reduce greenhouse gas (GHG) emissions are imposed on future development and City operations by incorporating them into the Mitigation Monitoring and Reporting Program (MMRP) for the Final EIR; and (3) initiate work on a General Plan Action Plan to identify measures such as new or amended regulations, programs and incentives to implement the GHG reduction policies.

Based on this approach, the Conservation Element of the General Plan has been revised to: incorporate an overview of climate change; discuss existing state and City actions to address climate change impacts; and establish comprehensive policies that would reduce the GHG emissions of future development, the existing community-at-large, and City operations. A key new Conservation Element policy is to “reduce the City’s carbon footprint” and to “develop and adopt new or amended regulations, programs and incentives as appropriate to implement the goals and policies set forth” related to climate change (CE-A.2). Additional policies have been added to “collaborate with climate science experts” to allow informed public decisions (CE-A.3) and to “regularly monitor and update the City’s Climate Protection Action Plan (CE-A.13).” The overall intent of these new policies is to unequivocally support climate protection actions, while retaining flexibility in the design of implementation measures which could be influenced by technological advances, environmental conditions, state and federal legislation, or other factors.

In addition, the Draft General Plan Land Use and Community Planning; Mobility; Urban Design; and Public Facilities, Services, and Safety elements have been edited to better support GHG reduction and climate change adaptation goals. These elements contain policy language related to sustainable land use patterns, alternative modes of transportation, energy efficiency, water supply, and GHG emissions associated with landfills. The Draft General Plan also calls for the City to employ sustainable building techniques, minimize energy use, maximize waste reduction and diversion, and implement water conservation measures. By adding these comprehensive policies into the Draft General Plan and MMRP and identifying Action Plan measures to implement these policies, the City has incorporated the principal objectives of the environmentally superior Enhanced Sustainability Alternative into the Draft General Plan. Furthermore, the addition of Policy ME-G.5 to the Mobility Element to “implement parking strategies that are designed to help reduce the number and length of automobile trips ...” implements the principal objective of the Increased Parking Management Alternative.

The Mitigation, Monitoring and Reporting Program (MMRP) containing a list of the General Plan policies which provide mitigation at the program level can be found in Section 9 of this PEIR. The revisions and/or information added to the draft PEIR, with the exception of the Section 9 MMRP, are shown in standard strikeout/underline format. Per CEQA Section 15088.5 (b) the addition of new information which clarifies or amplifies does not require recirculation of an EIR.

CONCLUSIONS:

This Program Environmental Impact Report (PEIR) analyzes the environmental impacts of the proposed Draft General Plan Project. The proposed Draft General Plan and this PEIR will be considered for adoption by the San Diego City Council. Prior to the City Council hearing, the adoption process also requires that the Planning Commission hold a noticed

public hearing. Based on the outcome of the hearing, the Planning Commission is required to forward a written recommendation to the City Council addressing the adoption of the General Plan.

The review and formal recommendation by the Planning Commission and adoption of the Draft General Plan by the City Council are the discretionary actions addressed in this PEIR. Since the General Plan is a citywide comprehensive policy-level document, future actions will be required for its implementation. The future actions include, but are not limited to the adoption/approval of the following: community plan updates, public facilities financing plan updates, land development code amendments, applicable ordinances, development of a park master plan, development of a pedestrian master plan, an update to the bicycle master plan, an update to the City's Economic Development Strategic Plan, development projects, and Capital Improvement Program (CIP) projects.

For each environmental issue area analyzed, a Mitigation Framework which identifies the means by which potentially significant impacts could be reduced or avoided in cases where the EIR analysis determined such impacts to be potentially significant, was included. Standard existing regulations, requirements, programs, and procedures that are applied to all similar projects were taken into account in identifying additional project specific mitigation that may be needed to reduce identified significant impacts.

SIGNIFICANT UNMITIGATED IMPACTS:

Agricultural Resources

Implementation of the Draft General Plan could result in significant impacts to agricultural resources due to the potential for development consistent with General Plan policies to conflict with agricultural productivity or with existing agricultural resources. Mitigation for impacts to agricultural resources would occur at the project level and may involve preservation of important agricultural lands or the establishment of buffers between new uses and existing adjacent agricultural uses.

Mitigation for project-specific impacts is not available at the Program EIR level since specific development projects are not known. Therefore, the impact to agricultural resources is significant and unavoidable.

Air Quality

Implementation of the Draft General Plan could result in significant impacts to air quality. Specifically, particulate matter from construction and concentrated carbon monoxide (CO) "hot spots" would be significant and unavoidable at the program level. Greenhouse gas emissions would also be significant and unavoidable. In general, compliance with goals, policies, and recommendations enacted by the City combined with the federal, state and local regulations would preclude or reduce air quality impacts. Compliance with the standards is required of all projects and is not considered to be mitigation. However, it is possible that for

certain projects, adherence to the regulations may not adequately protect air quality, and such projects would require additional measures to avoid or reduce significant air quality impacts. These additional measures would be considered mitigation.

For each future project requiring mitigation (i.e., measures that go beyond what is required by existing regulations), site-specific measures will be identified that reduce significant project-level impacts to less than significant or the project level impact may remain significant and unavoidable where no feasible mitigation exists. Where mitigation is determined to be necessary and feasible, these measures will be included in a Mitigation Monitoring and Reporting Program (MMRP) for the project. Because the degree of impact and applicability, feasibility, and success of these measures cannot be adequately known for each specific project at this program level of analysis, the program level impact related to deterioration of ambient air quality remains significant and unavoidable.

Biological Resources

Implementation of the Draft General Plan could result in significant impacts to biological resources. Specific project impacts to biological resources will be addressed through existing regulations: development projects must be designed to minimize impacts to natural habitats consistent with City plans and ordinances. Biological mitigation for upland impacts must be in accordance with the City's Biology Guidelines, Table 3.3.4. Development projects must provide for continued wildlife movement through wildlife corridors as identified in the MSCP Subarea Plan or as identified through project-level analysis. For all projects adjacent to the MHPA, the development must conform to all applicable MHPA Land Use Adjacency Guidelines (Section 1.4.3) of the MSCP Subarea Plan. Also, individual project mitigation measures may include, but are not limited to, provision of appropriately-sized bridges, culverts, or other openings to allow wildlife movement. The City can also require developers to schedule the construction of projects to avoid impacts to wildlife (e.g., avoid the breeding season for sensitive species) to the extent practicable, and can determine appropriate noise attenuation measures as it affects sensitive avian species, post construction, to reduce noise levels at the edge of occupied habitat. Lastly, the City requires the protection of wetlands and vernal pools and the prevention of disturbances to native vegetation to the extent practicable.

Mitigation for project-specific impacts is not available at the Program EIR level since specific development projects are not known. Therefore, the impact to biological resources remains significant and unavoidable.

Geologic Conditions

Implementation of the Draft General Plan could result in significant impacts to geologic conditions. Future development consistent with the General Plan may result in an increase in the number of people and buildings exposed to seismic ground-shaking. Potential effects from surface rupture and severe groundshaking could cause damage ranging from minor to catastrophic. Groundshaking could also cause secondary geologic hazards such as slope

failures and seismically-induced settlement. This is considered a potentially significant impact.

Slope failure results in landslides and mudslides from unstable soils or geologic units. Given that future development would occur in the course of implementing the Draft General Plan, it is anticipated that some of this development would be constructed on geologic formations susceptible to slope failure, thereby increasing the risk to people and structures. This is considered a potentially significant impact.

Future development that is on or in proximity to areas with steep slopes could increase erosion potential. Therefore, there is potential for a significant and unavoidable impact associated with erosion.

Future development may be proposed in areas prone to landslides or where soil limitations (i.e. those prone to liquefaction, subsidence, collapse, etc.) present a hazard to people. This is considered a potentially significant impact

Adherence to regulations and engineering design specifications are generally considered to preclude significant geologic impacts, and no mitigation is proposed at this program level of review. Goals, policies, and recommendations enacted by the City combined with the federal state and local regulations described above provide a framework for developing project level measures for future projects. Through the City's project review process compliance with standards is required of all projects and is not considered to be mitigation. However, it is possible that for certain projects, adherence to the regulations may not adequately protect against geologic impacts and such projects would require additional measures to avoid or reduce impacts. These additional measures would be considered for future projects requiring mitigation (i.e., measures that go beyond what is required by existing regulations). Where mitigation is determined to be necessary and feasible, these measures will be included in a Mitigation Monitoring and Reporting Program (MMRP) for the project. General measures that may be implemented to preclude project level impacts include preparation of soil and geologic conditions surveys, implementation of state seismic and structural design requirements, and grading techniques that reduce landslide and erosion hazard impacts.

Implementation of mitigation measures would reduce potential impacts. However, since the Draft General Plan does not include specific development projects, it is infeasible at the Program EIR level to provide project-specific mitigation that would reduce impacts to a less than significant level. Therefore, there is a potential for a significant and unavoidable impact associated with geologic hazards, erosion, and unstable geology and soils.

Health and Safety

Implementation of the Draft General Plan could result in significant impacts to health and safety. The potential for exposure of sensitive receptors to health hazards and wildfires will remain significant and unavoidable at the program level. Impacts associated with flooding, seiche, tsunami and mudflows, as well as potential conflicts with emergency operations

plans, are expected to be precluded. Implementation of the General Plan policies that address airport land use compatibility support the development of future uses that are consistent with the adopted ALUCP and will ensure that the health and safety impact of off-airport aircraft accidents is precluded.

The City implements the adopted Airport Land Use Compatibility Plans (ALUCPs) with the Airport Environs Overlay Zone (AEOZ). The AEOZ boundaries cover less area than the boundaries of the airport influence area, which could allow the development of future projects that could pose a potentially significant impact to health and safety outside of the AEOZ boundaries. ~~As a mitigation measure, the City will continue to submit discretionary projects within the airport influence area for each airport in the City with an adopted ALUCP to the ALUC for consistency determinations.~~ The City will work with the Airport Authority to identify to the types of ministerial projects within airport influence areas to submit to the ALUC for consistency determinations. The City will continue to submit development projects up until the time when the ALUC adopts the updated ALUCPs and subsequently determines that the City's affected land use plans, development regulations, and zoning ordinances are consistent with the ALUCPs.

The FAR Part 77 imaginary surfaces ~~may~~ extend beyond the boundaries of the Airport Influence Area and the adopted zoning ordinances and development regulations could cause the development of future structures that could pose a potentially significant impact to health and safety. ~~As a mitigation measure, the City will map the FAR Part 77 notification area in the City's geographic information system and use it to inform project applicants when they may need to notify the FAA of a proposed structure.~~ The City will inform project applicants when proposed projects meet the Part 77 criteria for notification to the FAA as identified in City of San Diego Development Services Department Information Bulletin 520. The City will not approve ministerial projects that require FAA notification without a FAA determination of "No Hazard to Air Navigation" for the project. The City will not recommend approval for discretionary projects that require FAA notification without a FAA determination of "No Hazard to Air Navigation" for the project until the project can fulfill state and ALUC requirements.

Mitigation measures that could decrease the identified health and safety impacts at the project level include the following: future projects that locate non-residential employment uses in proximity to residential development, or vice versa, must be sited and designed in a manner that reduces or avoids potential health and safety incompatibility impacts. Prior to the approval of any entitlement, the City would evaluate the project in light of the Conversion/Collocation Suitability Factors (located in Appendix C of the Draft General Plan), which would be used to analyze compatibility of site specific proposals. Additionally, future projects located in known High Fire Hazard Areas must be sited and designed to minimize impacts of fire. Prior to approval of any entitlement for a future project, the City would ensure that any impacts from wildfire or landslides will be reduced and, if necessary, mitigated in accordance with the requirements of the City of San Diego.

Historical Resources

Implementation of the Draft General Plan could result in significant impacts to historical resources associated with the built environment through substantial alteration, relocation, or demolition of historic buildings, structures, objects, landscapes, and sites and to important archaeological sites that occur on property proposed for development, including construction activities, such as grading and excavation. Additionally, the potential for encountering human remains during construction development activities is possible and impacts to human remains as a result of the Draft General Plan may occur. Although future development in accordance with the General Plan could have a significant impact on historical resources, adoption of the Plan would not, in and of itself, have a significant impact. In fact, the emphasis placed by the General Plan on conserving historical resources and integrating the protection of historical resources into the broader planning process would reduce impacts to historical resources that may have otherwise occurred with future projects could result in significant impacts. Measures incorporated into future projects can reduce potential impacts to historical resources. As part of the discretionary review of development projects, steps are taken to identify and mitigate significant impacts to historical resources.

Although significant impacts to historical resources may be mitigated through review of discretionary projects, **project**-specific mitigation at the Program EIR level is not available since specific development projects are not known. Therefore, the impact to historical resources is significant and unavoidable.

Hydrology

Implementation of the Draft General Plan could result in significant impacts to hydrology. The Draft General Plan calls for future growth to be focused into mixed-use activity centers. Implementation of the Plan would result in infill and redevelopment occurring in selected built areas, which would be identified through the community plan update/amendment process. The General Plan would also guide the development of remaining developable vacant land. Redevelopment and infill development could have impacts on existing absorption rates, drainage patterns, or the rate of surface runoff. Mitigation of these impacts can be addressed through project review. At this time, no specific projects have been proposed, and therefore it is not possible to propose feasible mitigation measures to reduce project-level impacts. Future projects must be sited and designed to minimize impacts to absorption rates, drainage patterns, and rates of surface runoff in accordance with City requirements and other appropriate agencies including the San Diego Regional Water Quality Control Board. Such siting and design may include implementation of the mitigation framework measures identified for impacts to Water Quality.

It is infeasible in this program level EIR to provide **project**-specific mitigation that would reduce any further impacts to a less than significant level. As such, significant unavoidable impacts related to absorption rates, drainage patterns, or rates of surface runoff remain.

Land Use

Implementation of the Draft General Plan could result in significant impacts to land use related to General Plan conflicts with goals in other adopted plans, incompatible land uses, and physically dividing communities. Existing and future regulations will provide development standards aimed at reducing land use incompatibilities. Currently, a Community Plan update program is being established to help ensure that the City's community plans are consistent with the General Plan, and that they serve as an effective means to implement citywide environmental policies and address policies related to Airport Land Use Plans. Future projects must also be implemented to ensure that they do not conflict with the General Plan and applicable community plans resulting in a physical impact on the environment. Prior to the approval of any entitlement, the City would evaluate whether proposed projects implement specified land use, density/intensity, design guidelines, Airport/Land Use Compatibility Plans, and other General Plan and community plan policies including open space preservation, community identity, mobility, and the timing, phasing, and provision of public facilities.

Because the degree of future impacts and applicability, feasibility, and success of future mitigation measures cannot be adequately known for each specific future project at this program level of analysis, the program-level impacts related to conflicts with goals in adopted plans; incompatible land uses; and that may physically divide established communities remains significant and unavoidable.

Mineral Resources

Implementation of the Draft General Plan could result in significant impacts to mineral resources. These impacts may occur when access to important mineral resources is restricted or prohibited through development of lands containing the resource or when non-compatible land uses are developed in close proximity thereby reducing the likelihood for extraction of those resources. No Mitigation Measures are available at the Program EIR level of review that could reduce project-specific significant impacts to important mineral resources. Thus, there is a potential for significant unavoidable impacts related to mineral resources.

Noise

Implementation of the Draft General Plan could yield significant noise impacts including short-term noise impacts to noise-sensitive land uses located adjacent to construction sites and long-term noise impacts associated with transportation improvements that increase the rate of use of buses and trains which can generate more noise per vehicle, development of commercial and industrial land uses which could result in the generation of unacceptable noise levels, and special civic or entertainment events held at various locations that have the potential to generate significant noise levels and adversely affect nearby sensitive receptors and land uses. The increase in population growth and increased economic and development activity in the City as a result of implementation of the General Plan has the potential to increase noise generated by various transportation modes, stationary sources and related

activities affecting both human and wildlife receptors. Implementation of the Draft General Plan could potentially locate multifamily residential land uses above the 65 dBA CNEL (except for aircraft noise in the Brown Field, Montgomery Field, MCAS Miramar Airport Influence Areas) including SDIA influence area where allowed by the Airport Land Use Compatibility Plan, and therefore subject them to a higher level of existing and future noise.

In order to mitigate these impacts, future development projects in areas where the existing or future noise level exceeds or would exceed the compatible noise level thresholds, as indicated in the Land Use Compatibility for Community Noise Environment Table (Table 3.10-6), must perform an acoustical study consistent with Acoustical Study Guidelines (Table NE-4 in the Draft General Plan), so that appropriate noise mitigation measures are included in the project design to meet the noise guidelines. Also, future projects must be sited and designed in a manner that avoids noise impacts to noise-sensitive land uses (e.g., residences, hospitals, schools, and libraries) and sensitive receptors. Where uses, particularly habitable structures, are planned near noise-generating sources, future projects must use a combination of architectural treatments or alternative methods to bring interior noise levels to below 45 dBA. Future development projects that are located in an Airport Influence Area must use appropriate noise attenuation methods recommended in the appropriate Airport Land Use Compatibility Plans in order to meet acceptable interior noise levels for the use and aviation easements where required. All non-emergency construction activity for future projects must comply with the limits (maximum noise levels, hours and days of activity) established in state and City noise regulations.

Although the General Plan PEIR identifies Mitigation Framework Measures to reduce these program level impacts, the degree of impact and applicability, feasibility, and success of these measures cannot be adequately known for each specific project at this program level of analysis. Therefore, the program level noise impact related to adoption of the Draft General Plan remains significant and unavoidable.

Paleontological Resources

Implementation of the Draft General Plan could result in significant impacts to paleontological resources through the loss of significant fossil resources through development consistent with the General Plan. Although steps are taken to identify and mitigate significant impacts to paleontological resources as part of the discretionary review of development projects, mitigation for the proposed project is not available. Additionally, impacts at the project level for non-discretionary projects would not be mitigated due to a lack of regulatory language in the land development code requiring protection of paleontological resources. Although mitigation measures would reduce impacts, it is infeasible at this Program EIR level to provide more project-specific mitigation that would reduce impacts to a less than significant level, since specific development projects are not known. Thus, the impact to paleontological resources is considered significant and unavoidable.

Population and Housing

Implementation of the Draft General Plan could result in significant impacts to population and housing. Some displacement of residents is likely to occur as older housing units are replaced. As areas redevelop, older housing units, and in some cases more affordable housing units will be replaced by higher cost housing units. Low-income households are most likely to be adversely affected. This could result in displacement and relocation of people away from the City and the region in search of more affordable housing. If the displacement necessitates construction of some replacement housing in the City and/or region, the construction may result in significant CEQA impacts. In some instances, people will have access to City programs providing housing assistance. Potential future project conditions could include: provision of on-site affordable housing, or affordable housing within the neighborhood in which the project is being built; provision of affordable housing targeted to very low-income households; and/or other tailored strategies designed to address specific neighborhood goals and priorities.

However, many of the programs are limited and not available in every area of the City. Since no specific development projects have been identified, it is infeasible at this Program EIR level to provide project-specific mitigation that would reduce impacts to a less than significant level. Therefore, displacement of substantial numbers residents necessitating the construction of replacement housing is considered a significant and unavoidable impact at this program level of review.

Public Facilities

Implementation of the Draft General Plan could result in significant impacts related to the construction of new or altered public facilities. No specific projects or actions have been identified with the Draft General Plan that would result in any direct or indirect physical change in the environment. However, future growth is anticipated and the construction of future public facilities needed to support that growth may result in environmental impacts. The need for new or upgraded facilities is addressed through the various means the City uses to fund the capital and operating expenses related to public facilities (e.g., developer fees and City Council budget decisions). However, the CEQA analysis of public services and facilities in this document focuses on the physical environmental impacts that could result from the construction of new facilities or the alteration of existing facilities. It is anticipated that many of these activities would result in physical impacts. Therefore, the framework for the mitigation of public services and facilities projects will vary, depending on the type of physical impacts resulting from each project

No specific projects or actions have been identified with the Draft General Plan that would result in any direct or indirect physical change in the environment. However, future growth is anticipated and the construction of future public facilities needed to support that growth may result in environmental impacts. Future environmental analysis would be required for specific public facilities projects necessary to implement the Draft General Plan to identify associated construction-related impacts and project-specific mitigation. At this program

level of review, impacts associated with the construction of public facilities are considered significant and unavoidable.

Public Utilities

Implementation of the Draft General Plan could result in significant impacts related to the construction of public utilities. No specific projects or actions have been identified with the Draft General Plan that would result in any direct or indirect physical change in the environment. However, future growth is anticipated and the construction of future public utilities needed to support that growth may result in environmental impacts. Therefore, impacts associated with the construction of public utilities may occur and even though mitigation measures have been identified, those impacts remain significant and unavoidable.

These impacts may be mitigated through innovative project design, construction and operations to reduce stormwater pollution, energy use, and waste generation. The strategic planting of trees in quantities and locations that maximize environmental benefits such as shading, could also mitigate certain impacts. Specific city-wide policies that apply to project review include the City's Sustainable Building Policy (900-14), which allows an expedited review time for the private sector ~~who present~~ building projects meeting LEED silver criteria. The City of Villages strategy, which is a part of the General Plan, Strategic Framework Element calls for strategic intelligent project siting, mix of land uses, and design that reduces the need to drive, thus reducing vehicle miles traveled compared to what would occur through conventional development. Additionally, the City's implementation of water and energy conservation measures is beyond what is required by local, state, and federal regulations. Additional policies within the Draft General Plan augment water supply contingency plans. The revised Draft General Plan contains strengthened and amplified policies to address the GHG emissions of future development, and sustainable development.

Transportation/Traffic/Circulation/Parking

Implementation of the Draft General Plan could result in significant impacts to traffic. At this time, no specific projects have been proposed, and therefore it is not possible to propose feasible mitigation measures to reduce project-level impacts. The Draft General Plan has established measures that will guide transportation development and planning in the future. Policies that address walkable communities, street and freeway system improvements, transportation demand management (TDM), bicycling, and parking management will serve to mitigate certain traffic impacts both at the project and city-wide level.

It is infeasible in this program level EIR to provide project-specific mitigation that would reduce impacts to a less than significant level. As such, significant unavoidable impacts related to transportation, traffic, circulation, and parking remain.

Visual Effects and Neighborhood Character

Implementation of the Draft General Plan could result in significant impacts to visual effects and neighborhood character. Future discretionary actions, private development projects, and public facilities (i.e. roads, transit lines, utilities) that occur subsequent to General Plan adoption may result in significant impacts associated with changes to the landform that may occur through site-specific grading, blocked public views from development that is incompatible in shape, form or intensity, and substantially altering the existing character of the City's neighborhoods. While the Draft General Plan policies are designed to minimize such impacts, there is no guarantee that all future implementation actions and development projects will adequately implement Draft General Plan policies.

The policies resulting from the adoption of the Draft General Plan could avoid or reduce the potential significant impacts to topography, public views and the existing character of established communities, but possibly not to below a level of significance. In addition, future community plan updates and the existing development review process could reduce potential impacts to visual and neighborhood quality. Because the degree of impact and applicability, feasibility, and success of future mitigation measures can not be adequately known for each specific future project at this program level of analysis, the program-level impacts related to topography, public views and character remains significant and unavoidable.

Water Quality

Implementation of the Draft General Plan could result in significant impacts to water quality. Almost all pollutants found in the impaired water bodies within the City have anthropogenic (man-made) origins; therefore increasing the population could increase the amount of pollution entering the aquatic ecosystem. Redevelopment and infill activities in urbanized areas could result in an increased amount of impervious surfaces. In addition, most development of vacant land could also decrease permeability. These impervious surfaces would result in increased runoff, adding to local non-point source pollution. Development could also cause erosion due to exposed graded surfaces, excavation, stock piling, or boring, and would potentially contribute to the sediment load in surface waters. Deposition of sediments downstream may be significant if they are introduced into a potable water supply (reservoirs), flood control channels, or wetlands. Increased deposition of sediments into water bodies can result in increased turbidity, clog streambeds, degrade aquatic habitat, and interfere with flow.

Future growth and development also has the potential to create impacts to groundwater quality. Groundwater degradation takes three forms: stock depletion, contamination, and secondary problems such as land subsidence and saline intrusion.

Mitigation can be conducted at the project review level by requiring developers to increase on-site filtration, preserve/restore/incorporate natural drainage systems into site design, and direct concentrated flows away from MHPA and open space areas. To the extent feasible,

avoiding development of areas particularly susceptible to erosion and sediment loss can additionally serve as a mitigation measure.

Because the degree of future impacts and applicability, feasibility, and success of future mitigation measures cannot be adequately known for each specific future project at this program level of analysis, the program-level impact related to water quality remains significant and unavoidable.

RECOMMENDED ALTERNATIVES FOR REDUCING SIGNIFICANT UNMITIGATED IMPACTS:

None of the project alternatives analyzed in this EIR would completely eliminate all of the significant impacts of the project. Selection of any of the project alternatives would, however, reduce the project's contribution to one or more of the significant impacts.

No Project

The No Project Alternative represents buildout under the currently adopted plans and does not represent a “no build” scenario in which no future development would occur. Under the No Project Alternative, the Draft General Plan would not be implemented and projected future growth would occur in accordance with the 1979 Progress Guide and General Plan (existing General Plan), the Strategic Framework Element, which was adopted by the City Council in October 2002, and the City's Housing Element, which was adopted in December 2006.

The No Project Alternative would generally meet all of the project objectives. Impacts associated with agricultural resources, biological resources, geologic conditions, health and safety, historic resources, hydrology, mineral resources, noise, paleontological resources, population and housing, public services and facilities, public utilities, visual effects and neighborhood character, and water quality would be similar compared to the Draft General Plan. Air quality, [global warming](#), land use and traffic impacts would be greater when compared to the Draft General Plan.

Enhanced Sustainability

This alternative is analyzed as a means of further reducing the environmental effects of the Draft General Plan related to energy and water consumption, solid waste generation, water quality and air quality. Specifically, this alternative would add mandatory policies to the Draft General Plan to enhance the sustainability of future development within the plan area.

The Enhanced Sustainability alternative would meet all of the project objectives. Impacts associated with agricultural resources, biological resources, geologic conditions, health and safety, historic resources, land use, mineral resources, noise, paleontological resources, population and housing, public services and facilities, traffic, and visual effects and neighborhood character would be similar compared to the Draft General Plan. Air quality,

global warming, hydrology, public utilities, and water quality impacts were originally determined to be less under this alternative. However, since the City has incorporated the principal objectives of this alternative into the Draft General Plan, the Draft General Plan now approaches the level of impacts estimated to occur under the Enhanced Sustainability Alternative. This is the environmentally superior alternative to the Draft General Plan.

Increased Parking Management

This alternative expands the currently available parking management tools by expanding implementation of Community Parking Districts and permit parking districts throughout the City. This alternative would also increase parking meter fees and extend the hours when parking meter payment is required. The Community Parking District program allows for direct investment and benefit of the parking management revenue generated within its boundaries, thus providing a source of revenue for community infrastructure and amenities. Permit parking districts address transient and spillover parking problems by restricting on-street parking to permit holders within a specified area. This alternative would substantially reduce free on-street parking in the City, increase parking meter fees and hours of enforcement thereby increasing the cost of parking. This would serve to reduce and or eliminate a number of automobile trips, reduce parking demand, and increase the number of multimodal trips such as carpooling, transit, walking and biking. This alternative is analyzed as a means of further reducing the environmental effects of the Draft General Plan relating to air quality and traffic.

The Increased Parking Management Alternative would meet all of the project objectives. Impacts associated with agricultural resources, biological resources, geologic conditions, health and safety, historic resources, hydrology, land use, mineral resources, noise, paleontological resources, population and housing, public services and facilities, public utilities, visual effects and neighborhood character, and water quality would be similar compared to the Draft General Plan. Air quality, global warming, and traffic impacts were initially determined to ~~would~~ be less under this alternative. However, since the City has incorporated the principal environmental objective of this alternative into the Draft General Plan, and the implementation mechanisms for the plan and the alternative would be similar (e.g. community specific parking plans and ordinance amendments), the Draft General Plan now approaches the level of impacts of the Increased Parking Management Alternative.

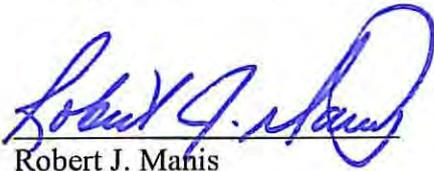
Concentrated Growth

This alternative is analyzed within this Program EIR as a means to focus projected growth into four subareas of the City that are served by high quality transit. Global warming impacts would be greater under this alternative. Other eEnvironmental impacts would be greater in these four subareas, but would likely decrease in other areas of the City. Under this alternative, infill and redevelopment would be focused in the Downtown San Diego and Uptown communities; and in Urban Village Centers within the Mission Valley/Morena/Grantville, University/Sorrento Mesa, and Midway-Pacific Highway subareas to a greater extent than is envisioned under the Draft General Plan. In addition, under this

alternative, higher density infill and redevelopment would be discouraged in Neighborhood/Community Villages and within Transit Corridors outside of the above-referenced subareas. Due to the high cost of land and the scarcity of vacant developable land in the four subareas, it would be difficult to secure the population-based park lands needed to provide public facilities in accordance with General Plan, as compared to the Draft General Plan.

MITIGATION, MONITORING AND REPORTING PROGRAM INCORPORATED INTO THE PROJECT:

The Mitigation Framework has been revised and amplified to further clarify within the MMRP (PEIR Section 9) the General Plan policies that would provide mitigation at the program level. Since the Draft General Plan does not include specific development projects, it is infeasible at the Program EIR level to provide project-specific mitigation that would reduce any future impacts to a less than significant level. Therefore, at this program level of review there is no project-specific Mitigation, Monitoring and Reporting Program proposed and significant and unavoidable impacts associated with the project remain.



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Deputy Director
Development Services Department

April 26, 2007
Date of Draft Report

September 28, 2007
Date of Final Report

Analyst: M. Mirrasoul

RESULTS OF PUBLIC REVIEW

- () No comments were received during the public input period.
- () Comments were received but the comments do not address the accuracy or completeness of the environmental report. No response is necessary and the letters are attached at the end of the EIR.
- (X) Comments addressing the accuracy or completeness of the EIR were received during the public input period. **The letters and responses are located in Appendix C of this document.**

PUBLIC REVIEW:

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

Federal Agencies

Federal Aviation Administration (1)

U. S. Fish and Wildlife Service (23)

U. S. Army Corps of Engineers (26)

U. S. Department of Agriculture (25)

Military

Naval Facilities Engineering Command, SW Division, Environmental Planning (12)

MCAS Miramar (13)

State of California

Departments

Department of Justice, Attorney General Edmund G. Brown

Department of Transportation, District 11 (33)

Department of Fish and Game (32)

Department of Parks and Recreation (40)

Department of Parks and Recreation, Office of Historic Preservation (41)

Department of Housing and Community Development (38)

Department of Toxic Substances Control (39)

Department of Conservation (60)

Department of Water Resources (45)

Department of Boating and Waterways (52)

Office of Planning and Research (57)

State Clearinghouse (46A)

Agencies

Resources Agency (43)

Regional Water Quality Control Board, Region 9 (44)

California Environmental Protection Agency (37)

Commissions/Boards

California Coastal Commission (47)

Native American Heritage Commission (56)

California State Lands Commission (62)

California Energy Commission (59)

California Public Utilities Commission

California Integrated Waste Management Board (35)

California State Coastal Conservancy (54)

Universities

University of San Diego (251)

San Diego State University (455)

University of California, San Diego (134)

San Diego County

Department of Planning and Land Use (68)
Department of Environmental Health (75 &76)
Department of Parks and Recreation (69)
Department of Agriculture (64)
Department of Education (66)
Department of Public Works (72)

City of San Diego

Elected Officials

Mayor Sanders
Council President Peters, District 1
Councilmember Faulconer, District 2
Councilmember Atkins, District 3
Councilmember Young, District 4
Councilmember Maienschein, District 5
Councilmember Frye, District 6
Councilmember Madaffer, District 7
Councilmember Hueso, District 8
City Attorney Aguirre, Shirley Edwards

Departments

Development Services Department
 Noise Analysis (82) – Werner Landry
 LDR Engineering (MS 501) – Don Weston
 LDR EAS (MS 501) – Marilyn Mirrasoul
 LDR Landscaping (MS 501) – Christine Rothman
 LDR Floodplain (MS 501) – Steve Lindsay
 LDR Planning (MS 501) – Anna McPherson
 LDR Transportation (MS 501) – Labib Qasem, Victoria Huffman, Ann Gonsalves
 LEA (MS 606L) – Bill Prinz
Park and Recreation Department (89) – Deborah Sharpe
 Park Development (93) – Jeff Harkness
Environmental Services Department (MS 1102A) – Lisa Wood
Water Department (MS 906) – George Adrian
Metropolitan Wastewater Department (MS 922) – Mehdi Rastakhiz
Library Department (81) – Mary Ann Tilotta
Fire-Rescue Department (MS 603) - Javier Mainar, Assistant Fire Chief
Police Department (MS 710) – Darryl Hoover, Sergeant
City Planning & Community Investment Department (MS 5A)
 MSCP Reviewer (5A) – Jeanne Krosch
 Facilities Financing (MS 606F) – Charlene Gabriel
Governmental Relations Department (MS 51M)
Neighborhood Code Compliance (MS 51N)
Real Estate Assets Department (85)
Engineering and Capital Projects Department (86)

City Agencies

San Diego Housing Commission (MS 49N)
City of San Diego Redevelopment Agency (MS 904)
Centre City Development Corporation (MS 51 D)
Southeastern Economic Development Corporation (SEDC) (448)

San Diego Regional Economic Development Corporation

Commissions

Commission for Arts and Culture (MS 652)
Library Commission (MS 17)
Planning Commission (MS 401)

Advisory Boards

San Diego Park and Recreation Board (MS 37C)
Small Business Advisory Board (MS 904)
Historical Resources Board (87)
Wetland Advisory Board (91A)
La Jolla Shores PDO Advisory Board (279)

Advisory Committees

Mission Bay Park Committee (320)
Balboa Park Committee (MS 35)
Airports Advisory Committee (MS 14)

Libraries

Balboa Branch Library (81B)
Beckwourth Branch Library (81C)
Benjamin Branch Library (81D)
Carmel Mountain Ranch Branch (81E)
Carmel Valley Branch Library (81F)
City Heights/Weingart Branch Library (81G)
Clairemont Branch Library (81H)
College-Rolando Branch Library (81I)
Kensington-Normal Heights Branch Library (81K)
La Jolla/Riford branch Library (81L)
Linda Vista Branch Library (81M)
Logan Heights Branch Library (81N)
Malcolm X Library & Performing Arts Center (81O)
Mira Mesa Branch Library (81P)
Mission Hills Branch Library (81Q)
Mission Valley Branch Library (81R)
North Clairemont Branch Library (81S)
North Park Branch Library (81T)
Oak Park Branch Library (81U)
Ocean Beach Branch Library (81V)
Otay Mesa-Nestor Branch Library (81W)
Pacific Beach/Taylor Branch Library (81V)
Paradise Hills Branch Library (81Y)
Point Loma/Hervey Branch Library (81Z)
Rancho Bernardo Branch Library (81AA)
Rancho Peñasquitos Branch Library (81BB)
San Carlos Branch Library (81DD)
San Ysidro Branch Library (81EE)
Scripps Miramar Ranch Branch Library (81FF)
Serra Mesa Branch Library (81GG)
Skyline Hills Branch Library (81HH)
Tierrasanta Branch Library (81II)

University Community Branch Library (81JJ)
University Heights Branch Library (81KK)
Malcolm A. Love Library (457)

Community Service Centers

Clairemont (274)
Navajo (337)
Peninsula (389)
Rancho Bernardo (399)
San Ysidro (435)
Scripps Ranch (442)

Other Cities

City of Chula Vista (94)
City of Coronado
City of Del Mar (96)
City of El Cajon (97)
City of Escondido (98)
City of Imperial Beach (99)
City of La Mesa (100)
City of Lemon Grove (101)
City of National City (102)
City of Poway (103)
City of Santee (104)
City of Solana Beach (105)

Native Americans

Ron Christman (215)
Louie Guassac (215A)
Clint Linton (215B)
Kumeyaay Cultural Repatriation Committee (225)
Native American Bands and Groups (225A - Q)

Other Agencies

San Diego Association of Governments (108)
San Diego Transit Corporation (112)
Sempra (114)
Metropolitan Transit Systems (115)
San Diego County Regional Airport Authority (110)
Local Agency Formation Commission (LAFCO) (111)
Otay River Park Joint Powers Authority
5201 Ruffin Road, Suite P, San Diego, CA 92123
San Dieguito River Park Joint Power Authority (425A)
County Water Authority (73)
Air Pollution Control District (65)
San Diego Unified Port District (109)

Community Groups, Associations, Boards, Committees and Councils

Community Planners Committee (194)

Community Planning Groups

Centre City Advisory Committee (243)
Otay Mesa - Nestor Planning Committee (228)

Otay Mesa Planning Committee (235)
Clairemont Mesa Planning Committee (248)
Greater Golden Hill Planning Committee (259)
Serra Mesa Planning Group (263A)
Kearny Mesa Community Planning Group (265)
Linda Vista Community Planning Committee (267)
La Jolla Community Planning Association (275)
City Heights Area Planning Committee (287)
Kensington-Talmadge Planning Committee (290)
Normal Heights Community Planning Committee (291)
Eastern Area Planning Committee (302)
Midway Community Planning Advisory Committee (307)
Mira Mesa Community Planning Group (310)
Mission Beach Precise Planning Board (325)
Mission Valley Unified Planning Organization (331)
Navajo Community Planners Inc. (336)
Carmel Mountain Ranch Community Council (344)
Carmel Valley Community Planning Board (350)
Del Mar Mesa Community Planning Board (361)
Greater North Park Planning Committee (363)
Ocean Beach Planning Board (367)
Old Town Community Planning Committee (368)
Pacific Beach Community Planning Committee (375)
Rancho Peñasquitos Planning Board (380)
Peninsula Community Planning Board (390)
Rancho Bernardo Community Planning Board (400)
Sabre Springs Community Planning Group (407)
San Pasqual - Lake Hodges Planning Group (426)
San Ysidro Planning and Development Group (433)
Scripps Ranch Community Planning Group (437)
Miramar Ranch North Planning Committee (439)
Skyline - Paradise Hills Planning Committee (443)
Torrey Hills Community Planning Board (444A)
Southeastern San Diego Planning Committee (449)
Encanto Neighborhoods Community Planning Group (449A)
College Area Community Council (456)
Tierrasanta Community Council (462)
Torrey Pines Community Planning Group (469)
University City Community Planning Group (480)
Uptown Planners (498)

Town/Community Councils

Clairemont Town Council (257)
Serra Mesa Community Council (264)
Rolando Community Council (288)
Oak Park Community Council (298)
Webster Community Council (301)
Darnell Community Council (306)
La Jolla Town Council (273)
Mission Beach Town Council (326)
Mission Valley Community Council (328 C)
San Carlos Area Council (338)

Ocean Beach Town Council, Inc. (376 A)
Pacific Beach Town Council (374)
Rancho Penasquitos Community Council (378)
Rancho Bernardo Community Council, Inc. (398)
Rancho Penasquitos Town Council (383)
United Border Community Town Council (434)
San Dieguito Planning Group (412)
Murphy Canyon Community Council (463)

Community Associations/Committees

North Park Community Association (366)
Normal Heights Community Center (293)
Normal Heights Community Association (292)
La Jollans for Responsible Planning (282)
Mission Hills Association (327)
La Jolla Shores Association (272)
Southeastern San Diego Development Committee (449)
Arroyo Sorrento Homeowners Association (356)
Burlingame Homeowners Association (364)
Crown Point Association (376)
Torrey Pines Association (379)
The San Dieguito Lagoon Committee (409)
Scripps Ranch Civic Association (440)
Torrey Pines Association (472)
Crest Canyon Citizens Advisory Committee (475)
University City Community Association (486)
Hillside Protection Association (501)
Allen Canyon Committee (504)

Redevelopment Project Area Committees

Barrio Logan
Crossroad
College Community
City Heights
North Park
North Bay

Other Interested Parties

San Diego Apartment Association (152)
San Diego Chamber of Commerce (157)
Building Industry Association/Federation (158)
San Diego River Park Foundation (163)
Sierra Club (165)
San Diego Natural History Museum (166)
San Diego Audubon Society (167, 167A)
California Native Plant Society (170)
Center for Biological Diversity (176)
San Diego River Conservancy (168)
Environmental Health Coalition (169)
Endangered Habitats League (182 & 182A)
Carmel Mountain Conservancy (184)
Torrey Pines Association (186)

AIA (190)
League of Women Voters (192)
Carmen Lucas (206)
Dr. Jerry Schaefer (208A)
South Coastal Information Center (210)
San Diego Historical Society (211)
San Diego Archaeological Center (212)
Save Our Heritage Organisation (214)
San Diego County Archaeological Society Inc. (218)
La Jolla Historical Society (221)
University of San Diego (251)
Tecolote Canyon Citizens Advisory Committee (254)
Friends of Tecolote Canyon (255)
Tecolote Canyon Rim Owner's Protection Association (256)
Marian Bear Natural Park Recreation Council (267 A)
UCSD Natural Reserve System (284)
Friends of the Mission Valley Preserve (330)
Mission Trails Regional Park Citizens Advisory Committee (341)
Los Peñasquitos Canyon Preserve Citizens Advisory Committee (360)
Friends of Rose Canyon (386)
Pacific Beach Historical Society (377)
Sunset Cliffs Natural Park Recreation Council (388)
San Dieguito Lagoon Committee (409)
San Dieguito River Park CAC (415)
San Dieguito River Valley Conservancy (421)
RVR PARC (423)
Beeler Canyon Conservancy (436)
Mission Trails Regional Park (465)
Friends of Los Peñasquitos Canyon Preserve, Inc., (313)
Tijuana River National Estuarine Reserve (229)
Tijuana's Municipal Planning Institute
San Dieguito River Park (116)
San Diego Regulatory Alert (174)
League of Conservation Voters (322)
Citizens Coordinate for Century III (324 A)
River Valley Preservation Project (334)
Friends of Adobe Falls (335)
Carmel Valley Trail Riders Coalition (351)
Carmel Mountain Conservancy (354)
Friends of San Dieguito River Valley (419)
Beeler Canyon Conservancy (436)
San Diego Board of Realtors (155)
San Diego Convention and Visitors Bureau (159)
CalPIRG (154)
San Diego Baykeeper (173)
San Diego Civic Solutions (*Canyonlands*)
Bobbie Herdes, RECON Environmental
[Donna Jones, Otay Mesa Planning Coalition](#)
[John Ponder, Otay Mesa Planning Coalition](#)
[Everett Delano, Friends of San Diego](#)
[Bruce Warren, EnvironMINE, Inc.,](#)
[Lee Campbell](#)

[Eric Germain](#)
[Carolyn R. Thomas](#)
[Randy Berkman](#)
[Rebecca Robinson-Wood](#)
[Stephen Haase, NAIOP](#)

School Districts

Elementary

Chula Vista School District (118)
Del Mar Union School District (119)
Solana Beach School District (129)
South Bay Union School District (130)
La Mesa-Spring Valley School District (121)
Lemon Grove School District (122)
National City School District (123)
San Ysidro School District (127)
Santee School District (128)

High School

San Dieguito Union High School District (126)
Sweetwater Union High School District (131)
Grossmont Union High School District (120)

Unified

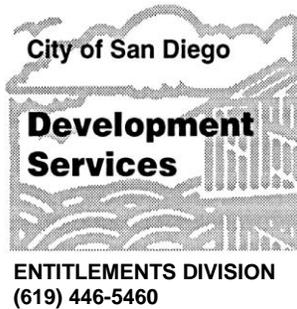
San Diego Unified School District (132)
Poway Unified School District (124)

Community College Districts

San Diego Community College District (133)
San Diego Mesa College (268)
Southwestern Community College District

General Plan E-mail Distribution List

The CPCI Department maintains an emailing distribution list with over 2,000 contacts. These contacts received the public notice via e-mail with a link to the website document.



REVISED FINAL

PROGRAM

ENVIRONMENTAL IMPACT REPORT

Project No. 104495
SCH No. 2006091032

SUBJECT: DRAFT GENERAL PLAN: CITY COUNCIL ADOPTION OF THE DRAFT GENERAL PLAN. The City of San Diego Draft General Plan is proposed to replace the existing 1979 *Progress Guide and General Plan* (1979 General Plan). The General Plan sets out a long-range, comprehensive framework for how the city will grow and develop, provide public services and maintain the qualities that define San Diego over the next 20-30 years. The proposed update has been guided by the City of Villages growth strategy and citywide policy direction contained within the General Plan Strategic Framework Element (adopted by the City Council on October 22, 2002). The Draft General Plan is comprised of an introductory Strategic Framework chapter and nine elements: Land Use and Community Planning; Mobility; Urban Design; Economic Prosperity; Public Facilities, Services and Safety; Recreation; Conservation; Noise; and Historic Preservation. The update to the Housing Element was adopted by the City Council under separate cover on December 5, 2006. Applicant: City Planning and Community Investment Department

DECEMBER 2008 UPDATE:

The Final PEIR has been updated to include revisions to the General Plan policies adopted by the City Council on March 2008. Copies of the Final PEIR errata pages showing the March 2008 revisions in strikeout/underline format are available upon request.

SEPTEMBER 2007 UPDATE:

In response to comments made on the Draft General Plan PEIR during the public review period, the City has undertaken the following actions to reduce the GHG emissions of future development and City operations under the General Plan and meet its obligations under CEQA to mitigate the cumulatively significant global warming

impacts of the General Plan: (1) modify the policy language of the October 2006 Draft General Plan to expand and strengthen climate change policies; (2) ensure that policies to reduce greenhouse gas (GHG) emissions are imposed on future development and City operations by incorporating them into the Mitigation Monitoring and Reporting Program (MMRP) for the Final EIR; and (3) initiate work on a General Plan Action Plan to identify measures such as new or amended regulations, programs and incentives to implement the GHG reduction policies.

Based on this approach, the Conservation Element of the General Plan has been revised to: incorporate an overview of climate change; discuss existing state and City actions to address climate change impacts; and establish comprehensive policies that would reduce the GHG emissions of future development, the existing community-at-large, and City operations. A key new Conservation Element policy is to “reduce the City’s carbon footprint” and to “develop and adopt new or amended regulations, programs and incentives as appropriate to implement the goals and policies set forth” related to climate change (CE-A.2). Additional policies have been added to “collaborate with climate science experts” to allow informed public decisions (CE-A.3) and to “regularly monitor and update the City’s Climate Protection Action Plan (CE-A.13).” The overall intent of these new policies is to unequivocally support climate protection actions, while retaining flexibility in the design of implementation measures which could be influenced by technological advances, environmental conditions, state and federal legislation, or other factors.

In addition, the Draft General Plan Land Use and Community Planning; Mobility; Urban Design; and Public Facilities, Services, and Safety elements have been edited to better support GHG reduction and climate change adaptation goals. These elements contain policy language related to sustainable land use patterns, alternative modes of transportation, energy efficiency, water supply, and GHG emissions associated with landfills. The Draft General Plan also calls for the City to employ sustainable building techniques, minimize energy use, maximize waste reduction and diversion, and implement water conservation measures. By adding these comprehensive policies into the Draft General Plan and MMRP and identifying Action Plan measures to implement these policies, the City has incorporated the principal objectives of the environmentally superior Enhanced Sustainability Alternative into the Draft General Plan. Furthermore, the addition of Policy ME-G.5 to the Mobility Element to “implement parking strategies that are designed to help reduce the number and length of automobile trips ...” implements the principal objective of the Increased Parking Management Alternative.

The Mitigation, Monitoring and Reporting Program (MMRP) containing a list of the General Plan policies which provide mitigation at the program level can be found in Section 9 of this PEIR. The revisions and/or information added to the draft PEIR, with the exception of the Section 9 MMRP, are shown in standard strikeout/underline format. Per CEQA Section 15088.5 (b) the addition of new information which clarifies or amplifies does not require recirculation of an EIR.

CONCLUSIONS:

This Program Environmental Impact Report (PEIR) analyzes the environmental impacts of the proposed Draft General Plan Project. The proposed Draft General Plan and this PEIR will be considered for adoption by the San Diego City Council. Prior to the City Council hearing, the adoption process also requires that the Planning Commission hold a noticed public hearing. Based on the outcome of the hearing, the Planning Commission is required to forward a written recommendation to the City Council addressing the adoption of the General Plan.

The review and formal recommendation by the Planning Commission and adoption of the Draft General Plan by the City Council are the discretionary actions addressed in this PEIR. Since the General Plan is a citywide comprehensive policy-level document, future actions will be required for its implementation. The future actions include, but are not limited to the adoption/approval of the following: community plan updates, public facilities financing plan updates, land development code amendments, applicable ordinances, development of a park master plan, development of a pedestrian master plan, an update to the bicycle master plan, an update to the City's Economic Development Strategic Plan, development projects, and Capital Improvement Program (CIP) projects.

For each environmental issue area analyzed, a Mitigation Framework which identifies the means by which potentially significant impacts could be reduced or avoided in cases where the EIR analysis determined such impacts to be potentially significant, was included. Standard existing regulations, requirements, programs, and procedures that are applied to all similar projects were taken into account in identifying additional project specific mitigation that may be needed to reduce identified significant impacts.

SIGNIFICANT UNMITIGATED IMPACTS:

Agricultural Resources

Implementation of the Draft General Plan could result in significant impacts to agricultural resources due to the potential for development consistent with General Plan policies to conflict with agricultural productivity or with existing agricultural resources. Mitigation for impacts to agricultural resources would occur at the project level and may involve preservation of important agricultural lands or the establishment of buffers between new uses and existing adjacent agricultural uses.

Mitigation for project-specific impacts is not available at the Program EIR level since specific development projects are not known. Therefore, the impact to agricultural resources is significant and unavoidable.

Air Quality

Implementation of the Draft General Plan could result in significant impacts to air quality. Specifically, particulate matter from construction and concentrated carbon monoxide (CO)

“hot spots” would be significant and unavoidable at the program level. Greenhouse gas emissions would also be significant and unavoidable. In general, compliance with goals, policies, and recommendations enacted by the City combined with the federal, state and local regulations would preclude or reduce air quality impacts. Compliance with the standards is required of all projects and is not considered to be mitigation. However, it is possible that for certain projects, adherence to the regulations may not adequately protect air quality, and such projects would require additional measures to avoid or reduce significant air quality impacts. These additional measures would be considered mitigation.

For each future project requiring mitigation (i.e., measures that go beyond what is required by existing regulations), site-specific measures will be identified that reduce significant project-level impacts to less than significant or the project level impact may remain significant and unavoidable where no feasible mitigation exists. Where mitigation is determined to be necessary and feasible, these measures will be included in a Mitigation Monitoring and Reporting Program (MMRP) for the project. Because the degree of impact and applicability, feasibility, and success of these measures cannot be adequately known for each specific project at this program level of analysis, the program level impact related to deterioration of ambient air quality remains significant and unavoidable.

Biological Resources

Implementation of the Draft General Plan could result in significant impacts to biological resources. Specific project impacts to biological resources will be addressed through existing regulations: development projects must be designed to minimize impacts to natural habitats consistent with City plans and ordinances. Biological mitigation for upland impacts must be in accordance with the City’s Biology Guidelines, Table 3.3.4. Development projects must provide for continued wildlife movement through wildlife corridors as identified in the MSCP Subarea Plan or as identified through project-level analysis. For all projects adjacent to the MHPA, the development must conform to all applicable MHPA Land Use Adjacency Guidelines (Section 1.4.3) of the MSCP Subarea Plan. Also, individual project mitigation measures may include, but are not limited to, provision of appropriately-sized bridges, culverts, or other openings to allow wildlife movement. The City can also require developers to schedule the construction of projects to avoid impacts to wildlife (e.g., avoid the breeding season for sensitive species) to the extent practicable, and can determine appropriate noise attenuation measures as it affects sensitive avian species, post construction, to reduce noise levels at the edge of occupied habitat. Lastly, the City requires the protection of wetlands and vernal pools and the prevention of disturbances to native vegetation to the extent practicable.

Mitigation for project-specific impacts is not available at the Program EIR level since specific development projects are not known. Therefore, the impact to biological resources remains significant and unavoidable.

Geologic Conditions

Implementation of the Draft General Plan could result in significant impacts to geologic conditions. Future development consistent with the General Plan may result in an increase in the number of people and buildings exposed to seismic ground-shaking. Potential effects from surface rupture and severe groundshaking could cause damage ranging from minor to catastrophic. Groundshaking could also cause secondary geologic hazards such as slope failures and seismically-induced settlement. This is considered a potentially significant impact.

Slope failure results in landslides and mudslides from unstable soils or geologic units. Given that future development would occur in the course of implementing the Draft General Plan, it is anticipated that some of this development would be constructed on geologic formations susceptible to slope failure, thereby increasing the risk to people and structures. This is considered a potentially significant impact.

Future development that is on or in proximity to areas with steep slopes could increase erosion potential. Therefore, there is potential for a significant and unavoidable impact associated with erosion.

Future development may be proposed in areas prone to landslides or where soil limitations (i.e. those prone to liquefaction, subsidence, collapse, etc.) present a hazard to people. This is considered a potentially significant impact

Adherence to regulations and engineering design specifications are generally considered to preclude significant geologic impacts, and no mitigation is proposed at this program level of review. Goals, policies, and recommendations enacted by the City combined with the federal state and local regulations described above provide a framework for developing project level measures for future projects. Through the City's project review process compliance with standards is required of all projects and is not considered to be mitigation. However, it is possible that for certain projects, adherence to the regulations may not adequately protect against geologic impacts and such projects would require additional measures to avoid or reduce impacts. These additional measures would be considered for future projects requiring mitigation (i.e., measures that go beyond what is required by existing regulations). Where mitigation is determined to be necessary and feasible, these measures will be included in a Mitigation Monitoring and Reporting Program (MMRP) for the project. General measures that may be implemented to preclude project level impacts include preparation of soil and geologic conditions surveys, implementation of state seismic and structural design requirements, and grading techniques that reduce landslide and erosion hazard impacts.

Implementation of mitigation measures would reduce potential impacts. However, since the Draft General Plan does not include specific development projects, it is infeasible at the Program EIR level to provide project-specific mitigation that would reduce impacts to a less than significant level. Therefore, there is a potential for a significant and unavoidable impact associated with geologic hazards, erosion, and unstable geology and soils.

Health and Safety

Implementation of the Draft General Plan could result in significant impacts to health and safety. The potential for exposure of sensitive receptors to health hazards and wildfires will remain significant and unavoidable at the program level. Impacts associated with flooding, seiche, tsunami and mudflows, as well as potential conflicts with emergency operations plans, are expected to be precluded. Implementation of the General Plan policies that address airport land use compatibility support the development of future uses that are consistent with the adopted ALUCP and will ensure that the health and safety impact of off-airport aircraft accidents is precluded.

The City implements the adopted Airport Land Use Compatibility Plans (ALUCPs) with the Airport Environs Overlay Zone (AEOZ). The AEOZ boundaries cover less area than the boundaries of the airport influence area, which could allow the development of future projects that could pose a potentially significant impact to health and safety outside of the AEOZ boundaries. The City will continue to submit discretionary projects within the airport influence area for each airport in the City with an adopted ALUCP to the ALUC for consistency determinations. The City will work with the Airport Authority to identify to the types of ministerial projects within airport influence areas to submit to the ALUC for consistency determinations. The City will continue to submit development projects up until the time when the ALUC adopts the updated ALUCPs and subsequently determines that the City's affected land use plans, development regulations, and zoning ordinances are consistent with the ALUCPs.

The FAR Part 77 imaginary surfaces extend beyond the boundaries of the Airport Influence Area and the adopted zoning ordinances and development regulations could cause the development of future structures that could pose a potentially significant impact to health and safety. The City will inform project applicants when proposed projects meet the Part 77 criteria for notification to the FAA as identified in City of San Diego Development Services Department Information Bulletin 520. The City will not approve ministerial projects that require FAA notification without a FAA determination of "No Hazard to Air Navigation" for the project. The City will not recommend approval for discretionary projects that require FAA notification without a FAA determination of "No Hazard to Air Navigation" for the project until the project can fulfill state and ALUC requirements.

Mitigation measures that could decrease the identified health and safety impacts at the project level include the following: future projects that locate non-residential employment uses in proximity to residential development, or vice versa, must be sited and designed in a manner that reduces or avoids potential health and safety incompatibility impacts. Prior to the approval of any entitlement, the City would evaluate the project in light of the Conversion/Collocation Suitability Factors (located in Appendix C of the Draft General Plan), which would be used to analyze compatibility of site specific proposals. Additionally, future projects located in known High Fire Hazard Areas must be sited and designed to minimize impacts of fire. Prior to approval of any entitlement for a future project, the City would ensure that any impacts from wildfire or landslides will be reduced and, if necessary, mitigated in accordance with the requirements of the City of San Diego.

Historical Resources

Implementation of the Draft General Plan could result in significant impacts to historical resources associated with the built environment through substantial alteration, relocation, or demolition of historic buildings, structures, objects, landscapes, and sites and to important archaeological sites that occur on property proposed for development, including construction activities, such as grading and excavation. Additionally, the potential for encountering human remains during construction development activities is possible and impacts to human remains as a result of the Draft General Plan may occur. Although future development in accordance with the General Plan could have a significant impact on historical resources, adoption of the Plan would not, in and of itself, have a significant impact. In fact, the emphasis placed by the General Plan on conserving historical resources and integrating the protection of historical resources into the broader planning process would reduce impacts to historical resources that may have otherwise occurred with future projects could result in significant impacts. Measures incorporated into future projects can reduce potential impacts to historical resources. As part of the discretionary review of development projects, steps are taken to identify and mitigate significant impacts to historical resources.

Although significant impacts to historical resources may be mitigated through review of discretionary projects, project-specific mitigation at the Program EIR level is not available since specific development projects are not known. Therefore, the impact to historical resources is significant and unavoidable.

Hydrology

Implementation of the Draft General Plan could result in significant impacts to hydrology. The Draft General Plan calls for future growth to be focused into mixed-use activity centers. Implementation of the Plan would result in infill and redevelopment occurring in selected built areas, which would be identified through the community plan update/amendment process. The General Plan would also guide the development of remaining developable vacant land. Redevelopment and infill development could have impacts on existing absorption rates, drainage patterns, or the rate of surface runoff. Mitigation of these impacts can be addressed through project review. At this time, no specific projects have been proposed, and therefore it is not possible to propose feasible mitigation measures to reduce project-level impacts. Future projects must be sited and designed to minimize impacts to absorption rates, drainage patterns, and rates of surface runoff in accordance with City requirements and other appropriate agencies including the San Diego Regional Water Quality Control Board. Such siting and design may include implementation of the mitigation framework measures identified for impacts to Water Quality.

It is infeasible in this program level EIR to provide project-specific mitigation that would reduce any further impacts to a less than significant level. As such, significant unavoidable impacts related to absorption rates, drainage patterns, or rates of surface runoff remain.

Land Use

Implementation of the Draft General Plan could result in significant impacts to land use related to General Plan conflicts with goals in other adopted plans, incompatible land uses, and physically dividing communities. Existing and future regulations will provide development standards aimed at reducing land use incompatibilities. Currently, a Community Plan update program is being established to help ensure that the City's community plans are consistent with the General Plan, and that they serve as an effective means to implement citywide environmental policies and address policies related to Airport Land Use Plans. Future projects must also be implemented to ensure that they do not conflict with the General Plan and applicable community plans resulting in a physical impact on the environment. Prior to the approval of any entitlement, the City would evaluate whether proposed projects implement specified land use, density/intensity, design guidelines, Airport/Land Use Compatibility Plans, and other General Plan and community plan policies including open space preservation, community identity, mobility, and the timing, phasing, and provision of public facilities.

Because the degree of future impacts and applicability, feasibility, and success of future mitigation measures cannot be adequately known for each specific future project at this program level of analysis, the program-level impacts related to conflicts with goals in adopted plans; incompatible land uses; and that may physically divide established communities remains significant and unavoidable.

Mineral Resources

Implementation of the Draft General Plan could result in significant impacts to mineral resources. These impacts may occur when access to important mineral resources is restricted or prohibited through development of lands containing the resource or when non-compatible land uses are developed in close proximity thereby reducing the likelihood for extraction of those resources. No Mitigation Measures are available at the Program EIR level of review that could reduce project-specific significant impacts to important mineral resources. Thus, there is a potential for significant unavoidable impacts related to mineral resources.

Noise

Implementation of the Draft General Plan could yield significant noise impacts including short-term noise impacts to noise-sensitive land uses located adjacent to construction sites and long-term noise impacts associated with transportation improvements that increase the rate of use of buses and trains which can generate more noise per vehicle, development of commercial and industrial land uses which could result in the generation of unacceptable noise levels, and special civic or entertainment events held at various locations that have the potential to generate significant noise levels and adversely affect nearby sensitive receptors and land uses. The increase in population growth and increased economic and development activity in the City as a result of implementation of the General Plan has the potential to

increase noise generated by various transportation modes, stationary sources and related activities affecting both human and wildlife receptors. Implementation of the Draft General Plan could potentially locate multifamily residential land uses above the 65 dBA CNEL (except for aircraft noise in the Brown Field, Montgomery Field, MCAS Miramar Airport Influence Areas) including SDIA influence area where allowed by the Airport Land Use Compatibility Plan, and therefore subject them to a higher level of existing and future noise.

In order to mitigate these impacts, future development projects in areas where the existing or future noise level exceeds or would exceed the compatible noise level thresholds, as indicated in the Land Use Compatibility for Community Noise Environment Table (Table 3.10-6), must perform an acoustical study consistent with Acoustical Study Guidelines (Table NE-4 in the Draft General Plan), so that appropriate noise mitigation measures are included in the project design to meet the noise guidelines. Also, future projects must be sited and designed in a manner that avoids noise impacts to noise-sensitive land uses (e.g., residences, hospitals, schools, and libraries) and sensitive receptors. Where uses, particularly habitable structures, are planned near noise-generating sources, future projects must use a combination of architectural treatments or alternative methods to bring interior noise levels to below 45 dBA. Future development projects that are located in an Airport Influence Area must use appropriate noise attenuation methods recommended in the appropriate Airport Land Use Compatibility Plans in order to meet acceptable interior noise levels for the use and aviation easements where required. All non-emergency construction activity for future projects must comply with the limits (maximum noise levels, hours and days of activity) established in state and City noise regulations.

Although the General Plan PEIR identifies Mitigation Framework Measures to reduce these program level impacts, the degree of impact and applicability, feasibility, and success of these measures cannot be adequately known for each specific project at this program level of analysis. Therefore, the program level noise impact related to adoption of the Draft General Plan remains significant and unavoidable.

Paleontological Resources

Implementation of the Draft General Plan could result in significant impacts to paleontological resources through the loss of significant fossil resources through development consistent with the General Plan. Although steps are taken to identify and mitigate significant impacts to paleontological resources as part of the discretionary review of development projects, mitigation for the proposed project is not available. Additionally, impacts at the project level for non-discretionary projects would not be mitigated due to a lack of regulatory language in the land development code requiring protection of paleontological resources. Although mitigation measures would reduce impacts, it is infeasible at this Program EIR level to provide more project-specific mitigation that would reduce impacts to a less than significant level, since specific development projects are not known. Thus, the impact to paleontological resources is considered significant and unavoidable.

Population and Housing

Implementation of the Draft General Plan could result in significant impacts to population and housing. Some displacement of residents is likely to occur as older housing units are replaced. As areas redevelop, older housing units, and in some cases more affordable housing units will be replaced by higher cost housing units. Low-income households are most likely to be adversely affected. This could result in displacement and relocation of people away from the City and the region in search of more affordable housing. If the displacement necessitates construction of some replacement housing in the City and/or region, the construction may result in significant CEQA impacts. In some instances, people will have access to City programs providing housing assistance. Potential future project conditions could include: provision of on-site affordable housing, or affordable housing within the neighborhood in which the project is being built; provision of affordable housing targeted to very low-income households; and/or other tailored strategies designed to address specific neighborhood goals and priorities.

However, many of the programs are limited and not available in every area of the City. Since no specific development projects have been identified, it is infeasible at this Program EIR level to provide project-specific mitigation that would reduce impacts to a less than significant level. Therefore, displacement of substantial numbers residents necessitating the construction of replacement housing is considered a significant and unavoidable impact at this program level of review.

Public Facilities

Implementation of the Draft General Plan could result in significant impacts related to the construction of new or altered public facilities. No specific projects or actions have been identified with the Draft General Plan that would result in any direct or indirect physical change in the environment. However, future growth is anticipated and the construction of future public facilities needed to support that growth may result in environmental impacts. The need for new or upgraded facilities is addressed through the various means the City uses to fund the capital and operating expenses related to public facilities (e.g., developer fees and City Council budget decisions). However, the CEQA analysis of public services and facilities in this document focuses on the physical environmental impacts that could result from the construction of new facilities or the alteration of existing facilities. It is anticipated that many of these activities would result in physical impacts. Therefore, the framework for the mitigation of public services and facilities projects will vary, depending on the type of physical impacts resulting from each project

No specific projects or actions have been identified with the Draft General Plan that would result in any direct or indirect physical change in the environment. However, future growth is anticipated and the construction of future public facilities needed to support that growth may result in environmental impacts. Future environmental analysis would be required for specific public facilities projects necessary to implement the Draft General Plan to identify associated construction-related impacts and project-specific mitigation. At this program

level of review, impacts associated with the construction of public facilities are considered significant and unavoidable.

Public Utilities

Implementation of the Draft General Plan could result in significant impacts related to the construction of public utilities. No specific projects or actions have been identified with the Draft General Plan that would result in any direct or indirect physical change in the environment. However, future growth is anticipated and the construction of future public utilities needed to support that growth may result in environmental impacts. Therefore, impacts associated with the construction of public utilities may occur and even though mitigation measures have been identified, those impacts remain significant and unavoidable.

These impacts may be mitigated through innovative project design, construction and operations to reduce stormwater pollution, energy use, and waste generation. The strategic planting of trees in quantities and locations that maximize environmental benefits such as shading, could also mitigate certain impacts. Specific city-wide policies that apply to project review include the City's Sustainable Building Policy (900-14), which allows an expedited review time for the private sector building projects meeting LEED silver criteria. The City of Villages strategy, which is a part of the General Plan, calls for strategic project siting, mix of land uses, and design that reduces the need to drive, thus reducing vehicle miles traveled compared to what would occur through conventional development. Additionally, the City's implementation of water and energy conservation measures is beyond what is required by local, state, and federal regulations. Additional policies within the Draft General Plan augment water supply contingency plans. The revised Draft General Plan contains strengthened and amplified policies to address the GHG emissions of future development, and sustainable development.

Transportation/Traffic/Circulation/Parking

Implementation of the Draft General Plan could result in significant impacts to traffic. At this time, no specific projects have been proposed, and therefore it is not possible to propose feasible mitigation measures to reduce project-level impacts. The Draft General Plan has established measures that will guide transportation development and planning in the future. Policies that address walkable communities, street and freeway system improvements, transportation demand management (TDM), bicycling, and parking management will serve to mitigate certain traffic impacts both at the project and city-wide level.

It is infeasible in this program level EIR to provide project-specific mitigation that would reduce impacts to a less than significant level. As such, significant unavoidable impacts related to transportation, traffic, circulation, and parking remain.

Visual Effects and Neighborhood Character

Implementation of the Draft General Plan could result in significant impacts to visual effects and neighborhood character. Future discretionary actions, private development projects, and public facilities (i.e. roads, transit lines, utilities) that occur subsequent to General Plan adoption may result in significant impacts associated with changes to the landform that may occur through site-specific grading, blocked public views from development that is incompatible in shape, form or intensity, and substantially altering the existing character of the City's neighborhoods. While the Draft General Plan policies are designed to minimize such impacts, there is no guarantee that all future implementation actions and development projects will adequately implement Draft General Plan policies.

The policies resulting from the adoption of the Draft General Plan could avoid or reduce the potential significant impacts to topography, public views and the existing character of established communities, but possibly not to below a level of significance. In addition, future community plan updates and the existing development review process could reduce potential impacts to visual and neighborhood quality. Because the degree of impact and applicability, feasibility, and success of future mitigation measures can not be adequately known for each specific future project at this program level of analysis, the program-level impacts related to topography, public views and character remains significant and unavoidable.

Water Quality

Implementation of the Draft General Plan could result in significant impacts to water quality. Almost all pollutants found in the impaired water bodies within the City have anthropogenic (man-made) origins; therefore increasing the population could increase the amount of pollution entering the aquatic ecosystem. Redevelopment and infill activities in urbanized areas could result in an increased amount of impervious surfaces. In addition, most development of vacant land could also decrease permeability. These impervious surfaces would result in increased runoff, adding to local non-point source pollution. Development could also cause erosion due to exposed graded surfaces, excavation, stock piling, or boring, and would potentially contribute to the sediment load in surface waters. Deposition of sediments downstream may be significant if they are introduced into a potable water supply (reservoirs), flood control channels, or wetlands. Increased deposition of sediments into water bodies can result in increased turbidity, clog streambeds, degrade aquatic habitat, and interfere with flow.

Future growth and development also has the potential to create impacts to groundwater quality. Groundwater degradation takes three forms: stock depletion, contamination, and secondary problems such as land subsidence and saline intrusion.

Mitigation can be conducted at the project review level by requiring developers to increase on-site filtration, preserve/restore/incorporate natural drainage systems into site design, and direct concentrated flows away from MHPA and open space areas. To the extent feasible,

avoiding development of areas particularly susceptible to erosion and sediment loss can additionally serve as a mitigation measure.

Because the degree of future impacts and applicability, feasibility, and success of future mitigation measures cannot be adequately known for each specific future project at this program level of analysis, the program-level impact related to water quality remains significant and unavoidable.

RECOMMENDED ALTERNATIVES FOR REDUCING SIGNIFICANT UNMITIGATED IMPACTS:

None of the project alternatives analyzed in this EIR would completely eliminate all of the significant impacts of the project. Selection of any of the project alternatives would, however, reduce the project's contribution to one or more of the significant impacts.

No Project

The No Project Alternative represents buildout under the currently adopted plans and does not represent a “no build” scenario in which no future development would occur. Under the No Project Alternative, the Draft General Plan would not be implemented and projected future growth would occur in accordance with the 1979 Progress Guide and General Plan (existing General Plan), the Strategic Framework Element, which was adopted by the City Council in October 2002, and the City's Housing Element, which was adopted in December 2006.

The No Project Alternative would generally meet all of the project objectives. Impacts associated with agricultural resources, biological resources, geologic conditions, health and safety, historic resources, hydrology, mineral resources, noise, paleontological resources, population and housing, public services and facilities, public utilities, visual effects and neighborhood character, and water quality would be similar compared to the Draft General Plan. Air quality, global warming, land use and traffic impacts would be greater when compared to the Draft General Plan.

Enhanced Sustainability

This alternative is analyzed as a means of further reducing the environmental effects of the Draft General Plan related to energy and water consumption, solid waste generation, water quality and air quality. Specifically, this alternative would add mandatory policies to the Draft General Plan to enhance the sustainability of future development within the plan area.

The Enhanced Sustainability alternative would meet all of the project objectives. Impacts associated with agricultural resources, biological resources, geologic conditions, health and safety, historic resources, land use, mineral resources, noise, paleontological resources, population and housing, public services and facilities, traffic, and visual effects and neighborhood character would be similar compared to the Draft General Plan. Air quality, global warming, hydrology, public utilities, and water quality impacts were originally

determined to be less under this alternative. However, since the City has incorporated the principal objectives of this alternative into the Draft General Plan, the Draft General Plan now approaches the level of impacts estimated to occur under the Enhanced Sustainability Alternative. This is the environmentally superior alternative to the Draft General Plan.

Increased Parking Management

This alternative expands the currently available parking management tools by expanding implementation of Community Parking Districts and permit parking districts throughout the City. This alternative would also increase parking meter fees and extend the hours when parking meter payment is required. The Community Parking District program allows for direct investment and benefit of the parking management revenue generated within its boundaries, thus providing a source of revenue for community infrastructure and amenities. Permit parking districts address transient and spillover parking problems by restricting on-street parking to permit holders within a specified area. This alternative would substantially reduce free on-street parking in the City, increase parking meter fees and hours of enforcement thereby increasing the cost of parking. This would serve to reduce and or eliminate a number of automobile trips, reduce parking demand, and increase the number of multimodal trips such as carpooling, transit, walking and biking. This alternative is analyzed as a means of further reducing the environmental effects of the Draft General Plan relating to air quality and traffic.

The Increased Parking Management Alternative would meet all of the project objectives. Impacts associated with agricultural resources, biological resources, geologic conditions, health and safety, historic resources, hydrology, land use, mineral resources, noise, paleontological resources, population and housing, public services and facilities, public utilities, visual effects and neighborhood character, and water quality would be similar compared to the Draft General Plan. Air quality, global warming, and traffic impacts were initially determined to be less under this alternative. However, since the City has incorporated the principal environmental objective of this alternative into the Draft General Plan, and the implementation mechanisms for the plan and the alternative would be similar (e.g. community specific parking plans and ordinance amendments), the Draft General Plan now approaches the level of impacts of the Increased Parking Management Alternative.

Concentrated Growth

This alternative is analyzed within this Program EIR as a means to focus projected growth into four subareas of the City that are served by high quality transit. Global warming impacts would be greater under this alternative. Other environmental impacts would be greater in the four subareas, but would likely decrease in other areas of the City. Under this alternative, infill and redevelopment would be focused in the Downtown San Diego and Uptown communities; and in Urban Village Centers within the Mission Valley/Morena/Grantville, University/Sorrento Mesa, and Midway-Pacific Highway subareas to a greater extent than is envisioned under the Draft General Plan. In addition, under this

alternative, higher density infill and redevelopment would be discouraged in Neighborhood/Community Villages and within Transit Corridors outside of the above-referenced subareas. Due to the high cost of land and the scarcity of vacant developable land in the four subareas, it would be difficult to secure the population-based park lands needed to provide public facilities in accordance with General Plan, as compared to the Draft General Plan.

MITIGATION, MONITORING AND REPORTING PROGRAM INCORPORATED INTO THE PROJECT:

The Mitigation Framework has been revised and amplified to further clarify within the MMRP (PEIR Section 9) the General Plan policies that would provide mitigation at the program level. Since the Draft General Plan does not include specific development projects, it is infeasible at the Program EIR level to provide project-specific mitigation that would reduce any future impacts to a less than significant level. Therefore, at this program level of review there is no project-specific Mitigation, Monitoring and Reporting Program proposed and significant and unavoidable impacts associated with the project remain.

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Deputy Director
Development Services Department

April 26, 2007
Date of Draft Report

September 28, 2007
Date of Final Report

Analyst: M. Mirrasoul

RESULTS OF PUBLIC REVIEW

- () No comments were received during the public input period.
- () Comments were received but the comments do not address the accuracy or completeness of the environmental report. No response is necessary and the letters are attached at the end of the EIR.
- (X) Comments addressing the accuracy or completeness of the EIR were received during the public input period. **The letters and responses are located in Appendix C of this document.**

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ACRONYM LIST

(A)	A logarithmic loudness scale is used to characterize dB
AAQS	Ambient Air Quality Standards
ACOE	U.S. Army Corps of Engineers
ADD	Assistant Deputy Director
ADRP	Archaeological Data Recovery Program
ADT	Average Daily Trip
AF/day	Acre-Feet per Day
AIA	Airport Influence Area
ALUCP	Airport Land Use Compatibility Plan
APZ	Accident Potential Zones
ARB	Air Resources Board
ARDDRP	Archaeological Research Design and Data Recovery Program
Basin Plan	Water Quality Control Plan for the San Diego Basin
BI	Building Inspector
BMPs	Best Management Practices
CBC	California Building Code
CDFG	California Department of Fish and Game
CDS	Continuous Deflective Separation
CEQA	California Environmental Quality Act
CLUP	Comprehensive Land Use Plan
CMP	Congestion Management Program
CNEL	Community Noise Equivalent Level
CPA	Community Plan Amendment
CPCI	City Planning and Community Investment
CPIOZ	Community Plan Implementation Overlay Zone
CWA	Clean Water Act
cy	Cubic Yards
dB	Decibel
DSD	Development Services Department
EAS	Environmental Analysis Section
EIR	Environmental Impact Report
EPA	Environmental Protection Agency
ERM	Environmental Review Manager
ESD	Environmental Services Department
ESL	Environmentally Sensitive Lands
FAR	Floor Area Ratio
FAA	Federal Aviation Administration
FBA	Facilities Benefit Assessment
General Plan	City of San Diego Progress Guide and General Plan
HA	Hydrologic Area
HRG	Historical Resources Guidelines
HU	Hydrologic Unit
HUD	Department of Housing and Urban Development
I-5	Interstate 5

I-805	Interstate 805
JURMP	Jurisdiction Urban Runoff Management Plan
kWh	Kilowatt Hours
LDR	Land Development Review
LAFCO	Local Agency Formation Commission
LOS	Level of Service
MAF	Million Acre-Feet
MCAS	Marine Corps Air Station
Mgd	Million Gallons per Day
MHPA	Multi-Habitat Planning Area
MLD	Most Likely Descendent
MMC	Mitigation Monitoring Coordination
MMRP	Mitigation Monitoring and Reporting Plan
Mph	Miles per Hour
MSCP	Multiple Species Conservation Program
MSL	Mean Seal Level
MS4	Multiple Separate Storm Sewer System
MWD	Metropolitan Water District
MWWD	Metropolitan Wastewater Department
NAAQS	National Ambient Air Quality Standards
NAAS	Native American Heritage Commission
NAS	Naval Air Station
NCCP	Natural Communities Conservation Plan
NOP	Notice of Preparation
NO _x	Nitrogen Oxides
NPDES	National Pollutant Discharge Elimination System
PDP	Planned Development Permit
PFFP	Public Facilities Financing Plan
PI	Principal Investigator
RAQS	Regional Air Quality Strategies
RE	Resident Engineer
ROG	Reactive Organic Gases
RSA	Regionally Significant Arterial
RWQCB	Regional Water Quality Control Board
SANDAG	San Diego Association of Governments
SB	Senate Bill
SCAB	Scout Coast (Los Angeles) Air Basin
SDAB	San Diego Air Basin
SDAPCD	San Diego Air Pollution Control District
SDCWA	San Diego County Water Authority
SDG&E	San Diego Gas and Electric
SDP	Site Development Permit
SDUSD	San Diego Unified School District
SIP	State Implementation Plan
SUSMP	Standard Urban Storm Water Mitigation Plan
SWPPP	Storm Water Pollution Prevention Plan

SWRCB	State Water Resources Control Board
TDS	Total Dissolved Solids
TIA	Traffic Impact Analysis
TM	Tentative Map
UCP	University Community Plan
UFC	Uniform Fire Code
USFWS	United States Fish and Wildlife Service
UTC	University Town Center
V/C	Volume to Capacity
WURMP	Watershed Urban Runoff Management Program

1.0 EXECUTIVE SUMMARY

This Program Environmental Impact Report (Program EIR) has been prepared pursuant to the California Environmental Quality Act (CEQA) for the City of San Diego's ~~October 2006~~ Draft General Plan (Draft General Plan). It analyzes the potential significant impacts of the adoption and implementation of the Draft General Plan by the City of San Diego. This document was prepared under the direction of the City's Environmental Review Manager, and it reflects the independent judgment of the City of San Diego as Lead Agency under CEQA.

1.1 PURPOSE AND SCOPE OF THE PROGRAM EIR

This Program EIR is intended to provide information to public agencies, the general public and decision makers regarding potential environmental impacts related to adoption and implementation of the Draft General Plan by the City of San Diego. The purpose of an EIR, under the provisions of CEQA, is "to identify the significant effects on the environment of a project, to identify alternatives to the project, and to indicate the manner in which those significant effects can be mitigated or avoided." (Public Resources Code **Section 21002.1(a)**)

The major purposes of this Program EIR are to:

- Identify current and projected environmental conditions which may affect or be affected by the Draft General Plan;
- Disclose the Draft General Plan's potential environmental impacts to the public and decision makers;
- Inform the public and foster public participation in the City's planning process;
- Identify goals, policies and recommendations and, to the extent feasible, mitigation measures which could eliminate or reduce potentially significant environmental impacts; and,
- Evaluate alternatives that might be environmentally superior to the Draft General Plan.

Section 15168 of the CEQA Guidelines defines a Program EIR as "an EIR which may be prepared on a series of actions that can be characterized as one large project and are related either: (1) geographically; (2) a[s] logical parts in the chain of contemplated actions; (3) in connection with the issuance of rules, regulations, plans, or other general criteria to govern the conduct of a continuing program; or (4) as individual activities carried out under the same authorizing statutory or regulatory authority and having generally similar environmental impacts which can be mitigated in similar ways." The Draft General Plan Program EIR was prepared to be consistent with the requirements established under **Section 15168** of the CEQA Guidelines.

Issues areas addressed in the Program EIR include:

- | | |
|--------------------------|--|
| ■ Agricultural Resources | ■ Noise |
| ■ Air Quality | ■ Paleontological Resources |
| ■ Biological Resources | ■ Population and Housing |
| ■ Geologic Conditions | ■ Public Services and Facilities |
| ■ Health and Safety | ■ Public Utilities |
| ■ Historic Resources | ■ Transportation/Traffic Circulation/Parking |
| ■ Hydrology | ■ Visual Effects and Neighborhood Character |
| ■ Land Use | ■ Water Quality |
| ■ Mineral Resources | |

The Program EIR also includes other required CEQA analyses including growth inducement, cumulative impacts, significant irreversible environmental changes, unavoidable significant environmental changes, areas of no significant environmental impact, and alternatives.

1.2 PROJECT SUMMARY

The City of San Diego's ~~October 2006~~-Draft General Plan is the proposed Project addressed in this Program Environmental Impact Report (Program EIR). California Government Code mandates that all cities prepare a general plan that establishes policies and standards for future development, housing affordability, and resource protection. State law also encourages cities to keep general plans current through regular updates.

The City's updated Draft General Plan sets out a long range, comprehensive framework for how the City could grow and develop, provide public services, and maintain the qualities that define San Diego for the next 20-plus years. The Draft General Plan has been guided by the City of Villages growth strategy and citywide policy direction contained within the Strategic Framework Element (adopted by the City Council on October 22, 2002). The updated General Plan would replace the Strategic Framework Element (2002) and the *Progress Guide and General Plan* (1979).

Because less than four percent of the City's land remains vacant and available for new development, the Plan's policies represent a shift in focus from how to develop vacant land to how to reinvest in existing communities. Therefore, the City has drafted new policies and programs to support changes in development patterns to emphasize combining housing, shopping, employment uses, schools, and civic uses, at different scales, in village centers. By directing growth primarily toward village centers, the strategy in the updated Draft General Plan works to preserve established residential neighborhoods and manage the City's growth over the long term. The City has developed this Plan within the context of state planning requirements, regional plans and population projections, and the issues and needs unique to the City of San Diego. As a result, the Draft General Plan establishes guiding principals and primary objectives to achieve:

1. An open space network formed by parks, canyons, river valleys, habitats, beaches, and ocean;
2. Diverse residential communities formed by the open space network;
3. Compact and walkable mixed-use villages of different scales within communities;
4. Employment centers for a strong economy;
5. An integrated regional transportation network of transit, roadways, and freeways that efficiently links communities and villages to each other and to employment centers;
6. High quality and well-maintained public facilities to serve the City's population, workers, and visitors;
7. Historic districts and sites that respect our heritage;
8. Balanced communities that offer opportunities for all San Diegans and share citywide responsibilities;
9. A clean and sustainable environment; and,
10. A high aesthetic standard.

The City's Draft General Plan achieves these principles and objectives through new policy direction in the following nine elements, combined with the previously adopted Housing Element: Land Use and Community Planning; Mobility; Urban Design; Economic Prosperity; Public Facilities, Services and Safety; Recreation; Conservation; Noise; and Historic Preservation. The update to the Housing Element was adopted under separate cover by the City Council on December 5, 2006.

The Draft General Plan requires San Diego City Council approval and certification of the Program EIR through a noticed public hearing (a Process 5 decision). Prior to the City Council hearing, a noticed Planning Commission hearing will be held. The Planning Commission will forward a written recommendation to the City Council for adoption of the General Plan and certification of the Program EIR.

Because the General Plan is a policy-level document, future actions will be required for its implementation. These future actions include, but are not limited to: community plan updates, land development code amendments, development of a park master plan, an update to the City's Economic Development Strategy, development projects, Capital Improvement Program projects, and others. Although it is expected that environmental review of these future actions may tier from this EIR, separate environmental analysis pursuant to CEQA will be performed for these actions. Approval of the General Plan and certification of this EIR will not authorize any physical development.

1.3 SUMMARY OF ENVIRONMENTAL IMPACTS AND MITIGATION MEASURES

Sections 3.1 through 3.17 of the Program EIR present the impact analysis for the Draft General Plan. **Table 1.0-1**, located at the end of this section, provides a summary of environmental impacts resulting from implementation of the Draft General Plan. **Table 1.0-1** also includes goals, policies, and recommendations and where feasible, mitigation measures to reduce and/or avoid the environmental effects, with a conclusion as to whether the impact may be mitigated to below a level of significance.

The Program EIR determined that the Draft General Plan could result in significant project-level and cumulative impacts to each environmental issue area analyzed within the EIR, including: agricultural resources, air quality, biological resources, geologic conditions, health and safety, historic resources, hydrology, land use, mineral resources, noise, paleontological resources, population and housing, public services and facilities, public utilities, transportation/traffic/circulation/parking, visual effects and neighborhood character, and water quality. The Program EIR provides a program-level mitigation framework to reduce these impacts. However, since no specific development projects have been proposed by the Draft General Plan, it is not possible to propose feasible mitigation measures to ensure that all future project-level impacts would be reduced to a level less than significant. As such, each of the issue areas identified above describes impacts that may remain significant and unavoidable even with the proposed program-level mitigation framework.

In response to comments made on the Draft General Plan during the public review period, the City has strengthened (amplified) the policies of the Draft General Plan to reduce greenhouse gas emissions of future development and City operations under the General Plan and meet the

obligations of CEQA to mitigate the cumulatively significant global warming impacts of the General Plan. In addition, the City has incorporated the principal objectives of the environmentally superior Enhanced Sustainability Alternative and the principal objective of the Increased Parking Management Alternative into the Draft General Plan.

1.4 POTENTIAL AREAS OF CONTROVERSY

Pursuant to § 15123(b) (2) of the state CEQA Guidelines, an EIR shall identify areas of controversy known to the lead agency including issues raised by agencies and the public. The Notice of Preparation for the Program EIR was distributed on September 8, 2006 for a 30-day public review and comment period. Public comments were received and reflect concern and/or controversy over several project-level and cumulative environmental issues. (Refer to Appendix A for the NOP and NOP comment letters.) In addition, two public scoping meetings were held, one on September 13, 2006, and the other on September 25, 2006. Major environmental issues and potential areas of controversy raised in the NOP comment letters as well as public scoping meetings are as follows:

- Air Quality
- Alternatives
- Biological Resources
- Growth Management and Growth Inducing Impacts
- Population and Housing
- Land Use
- Provision of Public Services and Facilities
- Public Utilities
- Strategic Framework Element EIR
- Traffic and Circulation
- Water Quality

1.5 SUMMARY OF PROJECT ALTERNATIVES

In addition to five alternatives initially considered but determined to be infeasible, Chapter 7.0 of this Program EIR analyzes four alternatives to the Draft General Plan as follows:

- No Project
- Enhanced Sustainability
- Increased Parking Management
- Concentrated Growth

No Project

This alternative is analyzed within this Program EIR as it is required under CEQA Guidelines §15126.6(e). For the purposes of this Program EIR, the No Project Alternative represents buildout under the currently adopted plans as further described below. This alternative does not represent a “no build” scenario in which no future development would occur. Under the No Project Alternative, the Draft General Plan would not be implemented and projected future

growth would occur in accordance with the 1979 Progress Guide and General Plan (existing General Plan), the Strategic Framework Element, which was adopted by the City Council in October 2002, and the City's Housing Element, which was adopted in December 2006.

The existing General Plan is out-of-date, and largely irrelevant for directing the type of future growth and development anticipated to occur in the years to come. It primarily addressed development of vacant land and ensuring that new communities were built with adequate public facilities. It does not have a distinct Land Use Element, but relies exclusively on community plans to provide land use designations and policies. The existing General Plan does not establish an effective citywide framework for how to remedy facilities deficits, prioritize capital improvements, or to preserve or create a high quality of life as the City matures.

The No Project Alternative would generally meet all of the project objectives. Impacts associated with agricultural resources, biological resources, geologic conditions, health and safety, historic resources, hydrology, mineral resources, noise, paleontological resources, population and housing, public services and facilities, public utilities, visual effects and neighborhood character, and water quality would be similar compared to the Draft General Plan. Air quality, land use and traffic impacts would be greater when compared to the Draft General Plan.

Enhanced Sustainability

This alternative is analyzed as a means of further reducing the environmental effects of the Draft General Plan related to energy and water consumption, solid waste generation, water quality and air quality. Specifically, this alternative would add mandatory policies to the Draft General Plan to enhance the sustainability of future development within the plan area.

The Enhanced Sustainability alternative would meet all of the project objectives. Impacts associated with agricultural resources, biological resources, geologic conditions, health and safety, historic resources, land use, mineral resources, noise, paleontological resources, population and housing, public services and facilities, traffic, and visual effects and neighborhood character would be similar compared to the Draft General Plan. Air quality, hydrology, public utilities, and water quality impacts would be less under this alternative. This is the environmentally superior alternative to the Draft General Plan.

Increased Parking Management

This alternative expands the currently available parking management tools by expanding implementation of Community Parking Districts and permit parking districts throughout the City. This alternative would also increase parking meter fees and extend the hours when parking meter payment is required. The Community Parking District program allows for direct investment and benefit of the parking management revenue generated within its boundaries, thus providing a source of revenue for community infrastructure and amenities. Permit parking districts address transient and spillover parking problems by restricting on-street parking to permit holders within a specified area. This alternative would substantially reduce free on-street parking in the City, increase parking meter fees and hours of enforcement thereby increasing the cost of parking. This would serve to reduce and or eliminate a number of automobile trips, reduce parking

demand, and increase the number of multimodal trips such as carpooling, transit, walking and biking. This alternative is analyzed as a means of further reducing the environmental effects of the Draft General Plan relating to air quality and traffic.

The Increased Parking Management Alternative would meet all of the project objectives. Impacts associated with agricultural resources, biological resources, geologic conditions, health and safety, historic resources, hydrology, land use, mineral resources, noise, paleontological resources, population and housing, public services and facilities, public utilities, visual effects and neighborhood character, and water quality would be similar compared to the Draft General Plan. Air quality and traffic impacts would be less.

Concentrated Growth

This alternative is analyzed within this Program EIR as a means to focus projected growth into four subareas of the City that are served by high quality transit. Environmental impacts would be greater in these four subareas, but would likely decrease in other areas of the City. Under this alternative, infill and redevelopment would be focused in the Downtown San Diego and Uptown communities; and in Urban Village Centers within the Mission Valley/Morena/Grantville, University/Sorrento Mesa, and Midway-Pacific Highway subareas to a greater extent than is envisioned under the Draft General Plan. In addition, under this alternative, higher density infill and redevelopment would be discouraged in Neighborhood/Community Villages and within Transit Corridors outside of the above-referenced subareas. Due to the high cost of land and the scarcity of vacant developable land in the four subareas, it would be more difficult to secure the population-based park lands needed to provide public facilities in accordance with General Plan, as compared to the Draft General Plan.

Note: The “Summary Table of Significant Impacts and Mitigation Framework to Reduce the Effects” located on pages 1.0-7 – 1.0-15 provides an overview of the Mitigation Framework. The Mitigation, Monitoring and Reporting Program containing a list of the General Plan policies which provide mitigation at the program level for each environmental issue area can be found in Section 9.

**Table 1.0-1
Summary Table of Significant Impacts and Mitigation Framework to Reduce the Effects**

Environmental Impact	Mitigation Framework
<i>Agricultural Resources (See Section 3.1)</i>	
<p>Implementation of the Draft General Plan could yield significant impacts to agricultural resources. Mitigation for impacts is not available at the Program EIR level since specific development projects are not known. Therefore, the impact to agricultural resources is significant and unavoidable.</p>	<p>Mitigation for impacts to agricultural resources would occur at the project level and may involve preservation of important agricultural lands or buffers between new uses and existing adjacent agricultural uses.</p>
<i>Air Quality (See Section 3.2)</i>	
<p>Implementation of the Draft General Plan could yield significant impacts to Air Quality. Specifically, particulate matter from construction and concentrated carbon monoxide (CO) “hot spots” would be significant and unavoidable at the program level. Greenhouse gas emissions would also be significant and unavoidable.</p>	<ul style="list-style-type: none"> • For projects that may exceed daily construction emissions established by the City of San Diego, Best Available Control Measures (BACMs) would be incorporated to reduce construction emissions to below daily emission standards established by the City. • Development that could significantly impact air quality, either individually or cumulatively, would receive entitlement only if conditioned with all reasonable mitigation to avoid, minimize, or offset the impact. As a part of this process, future projects may be required to buffer sensitive receptors from air pollution sources through the use of landscaping, open space, and other separation techniques.

**Table 1.0-1
Summary Table of Significant Impacts and Mitigation Framework to Reduce the Effects**

Environmental Impact	Mitigation Framework
<i>Biological Resources (See Section 3.3)</i>	
<p>Implementation of the Draft General Plan could yield significant impacts to biological resources. Mitigation for impacts is not available at the Program EIR level since specific development projects are not known. Therefore, the impact to biological resources remains significant and unavoidable.</p>	<ul style="list-style-type: none"> • Development projects must be designed to minimize impacts to natural habitats consistent with City plans and ordinances. • Biological mitigation for upland impacts must be in accordance with the City’s Biology Guidelines, Table 3.3.4. • Development projects must provide for continued wildlife movement through wildlife corridors as identified in the MSCP Subarea Plan or as identified through project-level analysis. Mitigation may include, but is not limited to, provision of appropriately-sized bridges, culverts, or other openings to allow wildlife movement. • For all projects adjacent to the MHPA, the development must conform to all applicable MHPA Land Use Adjacency Guidelines (Section 1.4.3) of the MSCP Subarea Plan. • Schedule the construction of projects to avoid impacts to wildlife (e.g., avoid the breeding season for sensitive species) to the extent practicable. • Implement appropriate noise attenuation measures as it affects sensitive avian species, post construction, to reduce noise levels at the edge of occupied habitat. • Protection of wetlands and vernal pools. • Limit the disturbance to native vegetation to the extent practicable.
<i>Geologic Conditions (See Section 3.4)</i>	
<p>Implementation of the Draft General Plan could yield significant impacts to geologic conditions. Since the Draft General Plan does not include specific development projects, it is infeasible at the Program EIR level to provide specific mitigation that would reduce any future impacts to a less than significant level. Therefore, at this program level of review, impacts a significant and unavoidable impact associated with seismic and geologic hazards, erosion, and unstable geology and soils remains.</p>	<p>General measures that may be implemented to preclude impacts include:</p> <ul style="list-style-type: none"> • Preparation of soil and geologic conditions surveys. • Implementation of state seismic and structural design requirements. • Grading techniques that reduce landslide and erosion hazard impacts.

**Table 1.0-1
Summary Table of Significant Impacts and Mitigation Framework to Reduce the Effects**

Environmental Impact	Mitigation Framework
<i>Health and Safety (See Section 3.5)</i>	
<p>Implementation of the Draft General Plan could yield significant impacts to health and safety. The potential for exposure of sensitive receptors to health hazards and wildfires will remain significant and unavoidable at the program level. The Airport Environs Overlay Zone (AEOZ) covers less area than the boundaries of the airport influence area, which could allow the development of future projects that could pose a potentially significant impact outside of the AEOZ boundaries, but within the airport influence area.</p>	<ul style="list-style-type: none"> • Future projects locating non-residential employment uses in proximity to residential development or vice versa must be sited and designed in a manner that reduces or avoids potential health and safety incompatibility impacts. Prior to the approval of any entitlement, the City would evaluate the project in light of the Conversion/Collocation Suitability Factors (located in Appendix C of the Draft General Plan) would be used to analyze compatibility of site specific proposals. • Future projects located in known High Fire Hazard Areas must be sited and designed to minimize impacts to fire. Prior to approval of any entitlement for a future project, the City would ensure that any impacts from wildfire or landslides will be reduced and, if necessary, mitigated in accordance with the requirements of the City of San Diego. • Future discretionary projects located in an airport influence area will be submitted to the ALUC for consistency determinations with the adopted ALUCPs up until the time when the ALUC adopts the updated ALUCPs. After the ALUC adoption of the updated ALUCPs, the City will submit future projects located in an airport influence area until the ALUC determines that the City’s affected land use plans, development regulations, and zoning ordinances are consistent with the ALUCPs. Amendments to land use plans, development regulations, and zoning ordinances that are within an airport influence area must be submitted the ALUC prior to adoption.
<i>Historical Resources (See Section 3.6)</i>	
<p>Implementation of the Draft General Plan could yield significant impacts to historical resources. Although significant impacts to historical resources may be mitigated through review of discretionary projects, specific mitigation at the Program EIR level is not available since specific development projects are not known. Therefore, the impact to historical resources is significant and unavoidable.</p>	<p>Specific mitigation at the Program EIR level is not available. However, measures incorporated into future projects can reduce potential impacts to historical resources. Steps are taken to identify and mitigate significant impacts to historical resources, as part of the discretionary review of development projects.</p>
<i>Hydrology (See Section 3.7)</i>	

**Table 1.0-1
Summary Table of Significant Impacts and Mitigation Framework to Reduce the Effects**

Environmental Impact	Mitigation Framework
<p>Implementation of the Draft General Plan could yield significant impacts to hydrology. At this time, no specific projects have been proposed, and therefore it is not possible to propose feasible mitigation measures to reduce project-level impacts, It is infeasible in this program level EIR to provide specific mitigation that would reduce any further impacts to a less than significant level. As such, significant unavoidable impacts related to absorption rates, drainage patterns, or rates of surface runoff remain.</p>	<p>Future projects must be sited and designed to minimize impacts to absorption rates, drainage patterns, and rates of surface runoff in accordance with City requirements and other appropriate agencies including the San Diego Regional Water Quality Control Board. Such siting and design may include implementation of the mitigation framework measures identified in Section 3.17.4 (see Water Quality section).</p> <p>The generalized Hydrology and Water Quality mitigation measures provided in the EIR may be updated, expanded and refined when applied to specific future projects based on project-specific design and changes in existing conditions, and local, state and federal laws.</p>
<p><i>Land Use (See Section 3.8)</i></p>	
<p>Implementation of the Draft General Plan could yield significant impacts to land use. Because the degree of future impacts and applicability, feasibility, and success of future mitigation measures cannot be adequately known for each specific future project at this program level of analysis, the program-level secondary environmental impacts related to conflicts with goals in adopted plans; incompatible land uses; and that may physically divide established communities remains significant and unavoidable.</p>	<p>A Community Plan update program is being established to help ensure that the City’s community plans are consistent with the General Plan, and that they serve as an effective means to implement citywide environmental policies and address policies related to Airport Land Use Plans.</p> <p>Existing and future regulations will also provide development standards aimed at reducing land use incompatibilities.</p> <p>Future projects must be reviewed to ensure that they do not conflict with the General Plan and applicable community plans resulting in a physical impact on the environment. Prior to the approval of any entitlement, the City would evaluate whether proposed projects implement specified land use, density/intensity, design guidelines, Airport Land Use Compatibility Plans, and other General Plan and community plan policies including open space preservation, community identity, mobility, and the timing, phasing, and provision of public facilities.</p>
<p><i>Mineral Resources (See Section 3.9)</i></p>	
<p>Implementation of the Draft General Plan could yield significant impacts to mineral resources. It is infeasible at this Program EIR level to provide more specific mitigation that would reduce impacts to a less than significant level, since specific development projects are not known. Thus, there is a potential</p>	<p>No Mitigation Measures are available at the Program EIR level of review that could reduce significant impacts to important mineral resources.</p>

**Table 1.0-1
Summary Table of Significant Impacts and Mitigation Framework to Reduce the Effects**

Environmental Impact	Mitigation Framework
for significant unavoidable impacts related to mineral resources.	

Noise (See Section 3.10)

<p>Implementation of the Draft General Plan could yield significant noise impacts. It is infeasible at this Program EIR level to provide more specific mitigation that would reduce impacts to a less than significant level, since specific development projects are not known. Thus, there is a potential for significant unavoidable impacts related to noise impacts.</p>	<ul style="list-style-type: none"> • Future development projects in areas where the existing or future noise level exceeds or would exceed the compatible noise level thresholds as indicated in the Land Use Compatibility for Community Noise Environment Table (Table 3.10-7) must perform an acoustical study consistent with Acoustical Study Guidelines (Table NE-4 in the Draft General Plan), so that appropriate noise mitigation measures are included in the project design to meet the noise guidelines. • Future projects must be sited and designed in a manner that avoids noise impacts to noise-sensitive land uses (e.g., residences, hospitals, schools, and libraries) and sensitive receptors. Prior to approval of any entitlement for a future project, the City will identify any noise impacts and measures to reduce and avoid such impacts in accordance with the City's Noise Ordinance and state regulations. This may require preparation of a noise analysis. • Where uses, particularly habitable structures, are planned near noise-generating sources, future projects must use a combination of architectural treatments or alternative methods to bring interior noise levels to below 45 dBA. or 50 dBA for specified uses as indicated in Table 3.10-7 • Future development projects that are located in an Airport Influence Area must use appropriate noise attenuation methods recommended in the appropriate Airport Land Use Compatibility Plans in order to meet acceptable interior noise levels for the use and aviation easements where required.
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Table 1.0-1
Summary Table of Significant Impacts and Mitigation Framework to Reduce the Effects

Environmental Impact	Mitigation Framework
	<ul style="list-style-type: none"> All non-emergency construction activity for future projects must comply with the limits (maximum noise levels, hours and days of activity) established in state and City noise regulations.

Paleontological Resources (See Section 3.11)

**Table 1.0-1
Summary Table of Significant Impacts and Mitigation Framework to Reduce the Effects**

Environmental Impact	Mitigation Framework
<p>Implementation of the Draft General Plan could yield significant impacts to paleontological resources. Although significant impacts to paleontological resources can be mitigated through review and monitoring of discretionary development projects, mitigation for the proposed project is not available. Additionally, impacts at the project level for non-discretionary projects would not be mitigated due to a lack of regulatory language in the land development code requiring protection of paleontological resources. It is infeasible at this Program EIR level to provide more specific mitigation that would reduce impacts to a less than significant level, since specific development projects are not known. Thus, the impact to paleontological resources is considered significant and unavoidable.</p>	<p>At this time, mitigation is accomplished through monitoring, recovery, and curation of fossils. Steps are taken to identify and mitigate significant impacts to paleontological resources as part of the discretionary review of development projects.</p>
<p><i>Population and Housing (See Section 3.12)</i></p>	
<p>Implementation of the Draft General Plan could yield significant impacts to population and housing. Since no specific development projects have been identified, it is infeasible at this Program EIR level to provide specific mitigation that would reduce impacts to a less than significant level. Therefore, displacement of substantial numbers residents necessitating the construction of replacement housing is considered a significant and unavoidable impact at this program level of review.</p>	<p>Specific mitigation at the Program EIR level is not available. However, measures incorporated into future projects may reduce any potential impacts.</p>
<p><i>Public Facilities (See Section 3.13)</i></p>	

**Table 1.0-1
Summary Table of Significant Impacts and Mitigation Framework to Reduce the Effects**

Environmental Impact	Mitigation Framework
<p>Implementation of the Draft General Plan could yield significant impacts related to the construction of new or altered public facilities. No specific projects or actions have been identified with the Draft General Plan that would result in any direct or indirect physical change in the environment. However, future growth is anticipated and the construction of future public facilities needed to support that growth may result in environmental impacts. Therefore, impacts associated with the construction of public facilities may occur and those impacts remain significant and unavoidable.</p>	<p>The need for new or upgraded facilities is addressed through the various means the City uses to fund the capital and operating expenses related to public facilities (e.g., developer fees and City Council budget decisions). However, the analysis of public services and facilities in this document focuses on the physical environmental impacts that could result from the construction of new facilities or the alteration of existing facilities. It is anticipated that many of these activities would result in physical impacts. Therefore, the framework for the mitigation of public services and facilities projects will vary, depending on the type of physical impacts resulting from each project. For instance, if the construction of a new park would impact biological and historical resources, the project’s mitigation measures would be developed using the mitigation framework in the Biological and Historical Resources sections contained in this document. In other words, the Public Facilities and Services mitigation framework is contained in the relevant impact issue area chapters of this document.</p>
<p><i>Public Utilities (See Section 3.14)</i></p>	
<p>Implementation of the Draft General Plan could yield significant impacts related to the construction of public utilities. No specific projects or actions have been identified with the Draft General Plan that would result in any direct or indirect physical change in the environment. However, future growth is anticipated and the construction of future public utilities needed to support that growth may result in environmental impacts. Therefore, impacts associated with the construction of public utilities may occur and those impacts remain significant and unavoidable.</p>	<ul style="list-style-type: none"> • Innovative project design, construction and operations to reduce storm water pollution, and energy use, and waste generation. The City’s Sustainable Building Policy (900-14) allows an expedited review time for the private sector who presents building projects meeting LEED silver criteria. • Implementation of water and energy conservation measures beyond what is required by local, state, and federal regulations. • Project siting, mix of land uses, and design that reduces the need to drive, thus reducing vehicle miles traveled compared to what would occur through conventional development. • Strategic planting of trees in quantities and locations that maximizes environmental benefits such as shading.
<p><i>Traffic (See Section 3.15)</i></p>	

**Table 1.0-1
Summary Table of Significant Impacts and Mitigation Framework to Reduce the Effects**

Environmental Impact	Mitigation Framework
<p>Implementation of the Draft General Plan could yield significant impacts to traffic. At this time, no specific projects have been proposed, and therefore it is not possible to propose feasible mitigation measures to reduce project-level impacts. It is infeasible in this program level EIR to provide specific mitigation that would reduce impacts to a less than significant level. As such, significant unavoidable impacts related to transportation/traffic/circulation/parking remain.</p>	<ul style="list-style-type: none"> • Walkable Communities – (see Draft General Plan policies ME-A.1 thru ME-A.10 for the policy foundation) • Street and Freeway System – (see Draft General Plan policies ME-C.1 thru ME-C.10) • Transportation Demand Management (TDM) – (see Draft General Plan policies ME-E.1 thru ME-E.8) • Bicycling – (see Draft General Plan policies ME-F.1 thru ME-F.6) • Parking Management – (see Draft General Plan policies ME-G.1 thru ME-G.4)
<p><i>Visual Effects-Neighborhood Character (See Section 3.16)</i></p>	
<p>Implementation of the Draft General Plan could yield significant impacts to visual effects-neighborhood character.</p>	<p>No feasible specific mitigation has been identified at this program level. Future discretionary actions and proposals will be analyzed pursuant to CEQA and project level mitigation required.</p>
<p><i>Water Quality (See Section 3.17)</i></p>	
<p>Implementation of the Draft General Plan could yield significant impacts to water quality. Because the degree of future impacts and applicability, feasibility, and success of future mitigation measures cannot be adequately known for each specific future project at this program level of analysis, the program-level impact related to water quality remains significant and unavoidable.</p>	<ul style="list-style-type: none"> • Increasing on-site filtration. • Preserving, restoring or incorporating natural drainage systems into site design. • Directing concentrated flows away from MHPA and open space areas. If not possible, drainage must be directed into sedimentation basins, grassy swales or mechanical trapping devices prior to draining into the MHPA or open space areas. • Reducing the amount of impervious surfaces through selection of materials, site planning, and the narrowing of street widths, where possible. • Increasing the use of vegetation in drainage design. • Maintaining landscape design standards that minimize the use of pesticides and herbicides. • To the extent feasible, avoiding development of areas particularly susceptible to erosion and sediment loss.

The level of significance after mitigation measures for each of the sections within the table remains significant and unavoidable.

2.0 INTRODUCTION, ENVIRONMENTAL SETTING, PROJECT DESCRIPTION, AND HISTORY OF PROJECT CHANGES

2.1 INTRODUCTION

The City of San Diego's ~~October 2006~~ Draft General Plan (~~Draft General Plan~~) is the proposed Project addressed in this Program Environmental Impact Report (Program EIR). The Project also includes General Plan update companion items described in EIR Section 2.4.0. The Draft General Plan sets out a long-range vision and comprehensive policy framework for how the City could grow and develop, provide public services, and maintain the qualities that define San Diego over the next 20 to 30 years. The Draft General Plan does not change land uses, but rather provides the framework and policy direction for future community plan updates. The preparation of the Draft General Plan has been guided by the City of Villages growth strategy and citywide policy direction contained within the General Plan Strategic Framework Element (SFE) adopted by the City Council on October 22, 2002. The Draft General Plan would replace the Strategic Framework Element and the *Progress Guide and General Plan* (1979).

The Draft General Plan is comprised of a new Strategic Framework section and the following nine elements: Land Use and Community Planning; Mobility; Urban Design; Economic Prosperity; Public Facilities, Services and Safety; Recreation; Conservation; Noise; and Historic Preservation. In addition to the elements listed above, the Housing Element is also a mandatory element that is part of the General Plan. However, the City of San Diego's Housing Element 2005-2010 is under separate cover and was adopted by City Council on December 5, 2006. A summary of the adopted Housing Element is provided in EIR Section 2.4.1.

2.1.1 Approvals Required to Implement the Project

The adoption of the Draft General Plan requires that the San Diego City Council approve and certify the Program EIR through a noticed public hearing (a Process 5 decision). Prior to the City Council hearing, the adoption process also requires that the Planning Commission hold a noticed public hearing. Based on the outcome of the hearing, the Planning Commission is required to forward a written recommendation to the City Council addressing the adoption of the General Plan and certification of the Program EIR.

Since the General Plan is a citywide comprehensive policy-level document, future actions will be required for its implementation. The future actions include, but are not limited to the adoption/approval of the following: community plan updates, public facilities financing plan updates, land development code amendments, applicable ordinances, development of a park master plan, development of a pedestrian master plan, an update to the bicycle master plan, an update to the City's Economic Development Strategy, development projects, and Capital Improvement Program (CIP) projects.

2.1.2 Intended Uses of the Program EIR

The Draft General Plan Project is a citywide comprehensive update of the General Plan and thus meets the criteria for environmental review through a Program EIR. A Program EIR, as defined by the California Environmental Quality Act (CEQA) 15168, is:

“an EIR which may be prepared on a series of actions that can be characterized as one large project and are related either geographically, as logical parts in the chain of contemplated actions, in connection with issuance of rules, regulations, plans, or other general criteria to govern the conduct of a continuing program, or as individual activities carried out under the same authorizing statutory or regulatory authority and having generally similar environmental effect which can be mitigated in similar ways.”

The major purposes of this Program EIR are:

- To identify current and projected environmental conditions which may affect or be affected by the Draft General Plan;
- To disclose the potential environmental impacts of the Draft General Plan to the public and decision makers;
- To inform the public and to foster public participation in the planning process for the Draft General Plan;
- To identify a mitigation framework which could eliminate or reduce potentially significant environmental impacts of the Draft General Plan; and
- To evaluate alternatives that might be environmentally superior to the Draft General Plan.

The intent of the analysis in this Program EIR is to determine whether implementation of the Draft General Plan will have a significant effect on the environment. A significant effect on the environment is defined as a substantial adverse change in the physical conditions that exist in the area affected by the Draft General Plan. If a significant effect is identified, the Program EIR identifies measures or alternatives that would generally be considered to substantially reduce that effect.

The Draft General Plan Program EIR, in accordance with CEQA, outlines the environmental setting for the Draft General Plan and identifies potential environmental impacts, the significance of the potential impacts, and mitigation measures to avoid or reduce potentially significant adverse environmental impacts. It also addresses cumulative impacts, growth-inducing impacts, effects found not to be significant, irreversible environmental effects, and alternatives.

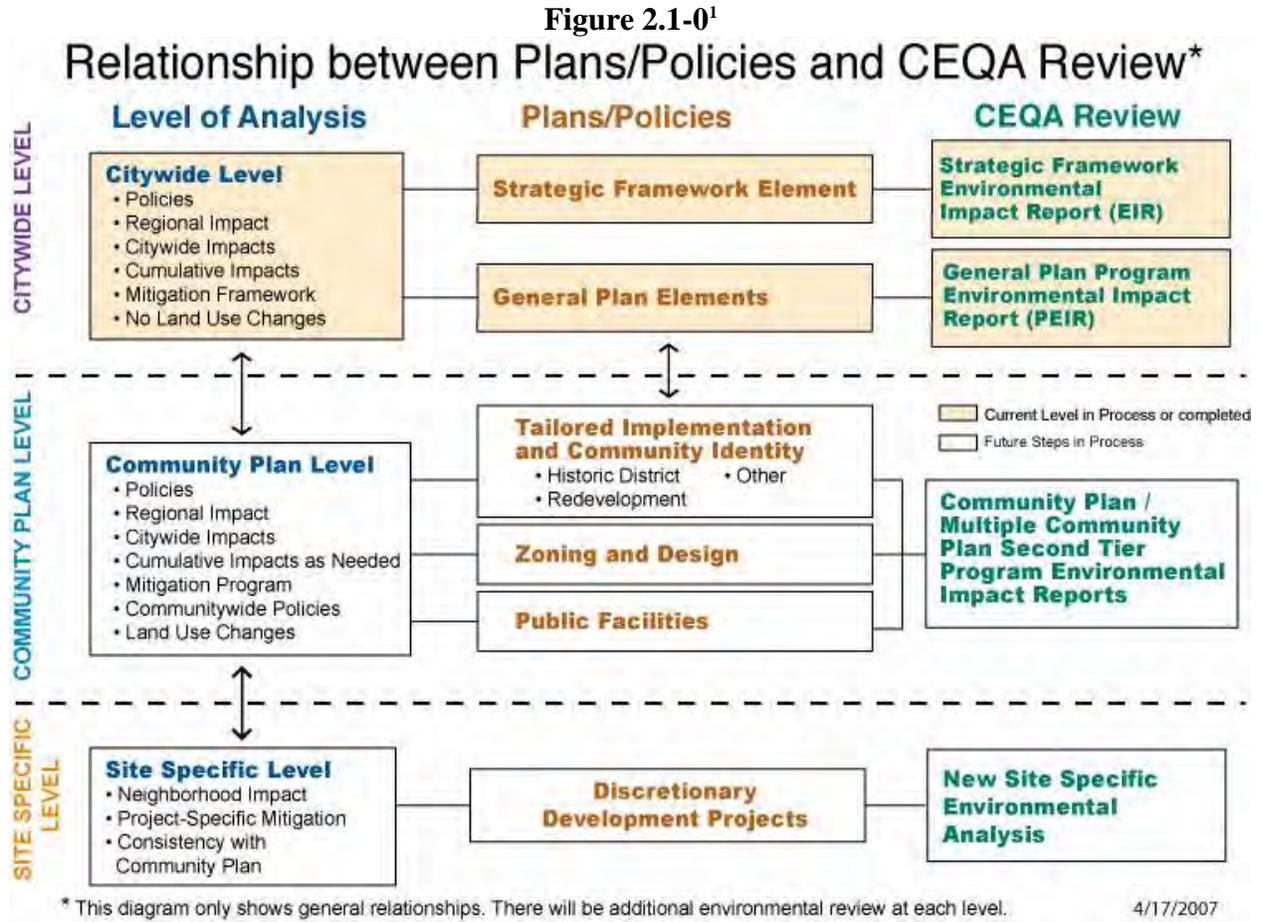
The City of San Diego is the lead agency for preparation and adoption of the Draft General Plan Program EIR. This Program EIR is intended for use by City of San Diego decision makers, other responsible or interested agencies and the general public in evaluating the potential environmental impacts that may result from the implementation of the Draft General Plan. There are no known responsible agencies for this Draft General Plan and Program EIR and no federal funds are being used to prepare them. According to CEQA 15386, trustee agencies that may be involved in future actions include the California Department of Fish and Game, the State Lands Commission, the State Department of Parks and Recreation, and the University of California. Federal agencies that may have involvement in future actions include, but are not limited to, the United States Fish and Wildlife Service and Army Corp of Engineers.

2.1.3 Relationship between Environmental Review for the Draft General Plan, the Strategic Framework Element, the Regional Comprehensive Plan, and Future Community Plan Updates and Development Projects

As shown on **Figure 2.1-0, Relationship between Plans/Policies and CEQA Review**, the Draft General Plan Program EIR provides new environmental analysis beyond that prepared for the previously approved Strategic Framework Element and Action Plan. The Draft General Plan Program EIR uses both the Strategic Framework Element EIR and the San Diego Association of Government's (SANDAG) Regional Comprehensive Plan (RCP) Program EIR as references for data and analysis. Since the draft General Plan provides the policy framework for future community plan updates, future community plan updates will require more specific environmental analysis at the community plan area level than this Program EIR provides and development projects will require more specific environmental analysis at the site area level. Subsequent environmental analysis for community plan updates may use this Draft General Plan Program EIR as a reference and first tier environmental document in accordance with CEQA, but it should be understood that certification of this EIR would not by itself authorize any physical development projects.

The City of San Diego and other agencies may use information in this Program EIR to determine if additional environmental review is required for subsequent actions linked to the General Plan. All subsequent discretionary actions requiring environmental review will be prepared in accordance with the requirements of CEQA. Under Section 15168, if an agency determines that a program or action will result in impacts within the scope of the impacts reported in this Program EIR and that no further mitigation is required; the agency may deem the project to be within the scope of the Program EIR, and no further environmental review will be required.

The City adopted the General Plan Housing Element on December 2006, and it is not a part of the Draft General Plan or the environmental analysis for this Program EIR. The state requires that General Plan Housing Element updates be performed on a five-year cyclic basis. The adopted Housing Element covers the five-year period from 2005 to 2010. Environmental analysis for the Housing Element was through an Addendum to EIR No. 40-1027 (the City of Villages Growth Strategy SFE EIR). However, an analysis of citywide population and housing data is provided in **Section 3.12**. The Housing Element differs from the other elements in the General Plan in several respects. The state requirements for the Housing Elements are more specific than for other General Plan elements and require that quantifiable goals be established and that specific programs be identified to meet these goals. Although the adopted Housing Element 2005-2010 is consistent with the policy direction of the other elements in the Draft General Plan, it is expected that the next Housing Element (2010-2015) will be similarly organized to match the format of the Draft General Plan. Refer to EIR **Section 2.4.1** for a summary of the adopted Housing Element.



¹Figure 2.1-0 does not reflect the environmental analysis for the Housing Element, which was provided through an addendum to the SFE EIR.

2.2 ENVIRONMENTAL SETTING

Project Area

The project area for the Draft General Plan includes the jurisdictional boundaries and planning areas of the City of San Diego as well as prospective annexation areas, as shown on **Figure 2.2-1**. The City of San Diego land area covers nearly 332 square miles (not including water bodies) and is located in the southwestern corner of California, within the county of San Diego as shown on **Figure 2.2-2**. The Pacific Ocean provides both the City and the county’s western boundary and the Republic of Mexico is immediately adjacent to the City and the county to the south.

The City is bordered on the northwest by the coastal communities of the city of Del Mar and the city of Solana Beach. Inland to the north, the City is bordered by unincorporated portions of the county, the city of Escondido and the city of Poway. To the east, the City is adjacent to the unincorporated portions of the county, the city of Santee, the city of La Mesa, and the city of Lemon Grove. The northern portion of San Diego is bordered on the south by the city of National City. The southern portion of the City is bordered on the north by the city of Chula Vista, on the east by unincorporated portions of San Diego County, to the south by city of Tijuana, Mexico, and to the west by the city of Imperial Beach. In addition, the city of Coronado lies west of San Diego Bay. The San Diego Coronado Bay Bridge connects the island of Coronado to San Diego.

The City of San Diego's location within San Diego County is mainly in the southwestern coastal plain (2002, San Diego, SFE EIR). This coastal plain ranges in elevation from sea level to approximately 600 feet Above Mean Sea Level (AMSL) and varies from rolling terraces to steep cliffs along the coast line (2004, SANDAG, RCP PEIR). The region's topography varies greatly, from beaches on the west to mountains and desert on the east. Much of San Diego's topography consists of mesa tops intersected by canyon areas.

Major drainages in the coastal plain include, from north to south, the San Dieguito River, Los Peñasquitos Canyon, Carroll Canyon, Rose Canyon, San Diego River, Los Chollas Creek, Sweetwater River, Otay River and the westernmost mouth of the Tijuana River. Significant features of San Diego's topography include its three marine terraces, which step up the coastal plain west to east towards the inland foothills. Closest to the coast at elevations of 50 feet to 70 feet AMSL is the La Jolla Terrace. Next, at elevations of 300 feet to 500 feet AMSL is the Linda Vista Terrace, which is the largest and contains the "mesa" communities: Mira Mesa, Kearny Mesa, Serra Mesa, Otay Mesa, and Clairemont Mesa (2002, San Diego, SFE EIR). The third terrace, the Poway Terrace, has eroded away and is no longer a distinct landform.

Each large mesa has developed into unique communities separated and physically bounded by distinct natural barriers, the major east-west canyons. While development has occurred in Mission Valley and portions of other drainages, efforts to provide open space and reduce land intensity in San Dieguito River Valley, Los Peñasquitos Canyon, San Clemente Canyon, and the Otay River Valley will allow the City of San Diego an opportunity to retain and/or develop unique communities with distinct physical separation. Level land, land with a slope of 12 percent or less, is considered most suitable for development and comprises 40 percent of the metropolitan area. Very steep hillsides and canyons, land traditionally less suitable for development, comprises 30 percent of the area. The remaining 30 percent is comprised of areas with slopes between 12 to 25 percent (2002, San Diego, SFE EIR).

The weather of the San Diego region, as in most of southern California, is influenced by the Pacific Ocean and its semi-permanent high-pressure systems that result in dry, warm summers and mild, occasionally wet winters. The average temperature ranges from the mid-40s to the high-90s. Most of the county's precipitation falls from November to April, with infrequent (approximately ten percent) precipitation during the summer. The average seasonal precipitation

along the coast is approximately ten inches; the amount increases with elevation as moist air is lifted over the mountains (University of California, 1970). The interaction of ocean, land, and the Pacific High Pressure Zone maintains clear skies for much of the year and drives the prevailing winds (2004, SANDAG, RCP PEIR).

As a result of its unique topography and climate, the San Diego region has been identified as a major “hot spot” for biodiversity and species endangerments. The San Diego region contains habitats and species that are considered to be sensitive by state and federal agencies, affected local jurisdictions and conservation organizations. Many unique and endangered species are found only in the San Diego region (2004, SANDAG, RCP PEIR).

Section 3.0 of this Program EIR provides additional, more specific information relating to San Diego’s current environmental setting/condition pertaining to: agriculture, air quality, biological resources, land use, transportation, visual effects and neighborhood character, air quality, geologic conditions, health and safety, historic resources, hydrology, land use, mineral resources, noise, paleontological resources, population and housing, public services and facilities, public utilities, water supply and quality. For each of the topical issue areas, the existing condition is described in the first section of each analysis section.

Public Facilities Financing

The City of San Diego funds public facilities and services through a variety of funding sources. Impact fees are the major source of funding for City CIP projects. The City’s impact fee program was initiated to implement the growth management program contained in the *Progress Guide and General Plan* (1979 General Plan). The 1979 General Plan growth management program addressed increased growth on the periphery of the City, and the declining growth in the central areas of the City. The plan sought to revitalize the central business district and phase growth and development in outlying areas in accordance with the availability of public facilities and services.

The 1979 General Plan divided the City into three “tiers”: urbanized, planned urbanizing, and future urbanizing. The planned urbanizing areas consisted of newly developing communities where development was required to “pay its own way” through Facilities Benefit Assessments (FBA), or other financing mechanisms such as Mello-Roos Community Facilities. Growth was encouraged in urbanized communities, with the assumption that public capital improvement expenditures from the General Fund would be provided in those areas.

State constitutional and legislative actions adopted in the late 1970s and early 1980s significantly impacted local government financing of operations and capital needs. The passage of Proposition 13 in 1978 ~~drastically~~ reduced property tax revenues and required all “special taxes” be approved by two-thirds of local voters. Additional measures, such as Propositions 62 (1986) and 218 (1996) ~~approved in the 1980s, exacerbated fiscal challenges for local governments~~ ~~with required~~ additional voter ~~approval requirements~~ on new taxes. These actions ~~severely~~ limited local government’s ability to generate new revenue sources. Remaining General Fund revenues were allocated to many competing needs. As a consequence, urbanized communities were left without a stable, dedicated funding source, and capital improvements did not keep pace with development.

Since their establishment in 1980, FBAs have been intended to assure adequate and timely public facilities, such as police, fire, parks and recreation, library, and transportation. To a limited extent, FBA revenues have also funded water and sewer facilities, although adopted user rate fees have served as the secured revenue source for these capital improvements and operations.

Following a period of rapid growth in the 1980s and passage of the Mitigation Fee Act (California Government Code §66000-66025), the City Council adopted a Development Impact Fee (DIF) ordinance in 1987. The fee ordinance allowed the City to establish DIFs in urbanized communities to collect a proportional fair share of capital improvements needed to offset the impact of the development. Unlike FBAs, DIFs were not intended to fully fund all capital improvements for existing and future development; fee revenues were contingent upon costs of identified needs, and rate and type of development. Furthermore, costs of new facilities were shared by new growth and the existing resident base. In the years since their adoption, impact fees have contributed to a number of capital improvements. However, as private urban infill development continued, and a funding source to cover the portion of facilities attributed to existing residents was not identified, the public facilities deficit in urbanized communities continued to grow. In addition, any operating or maintenance costs associated with new facilities were incurred by the City, since legally FBA and DIF could only be used for capital improvement expenses.

The Strategic Framework Element (SFE) identifies the facilities deficit in urbanized communities, and contains policies addressing existing and future public facility and service needs. The SFE direction has been further developed in the Draft General Plan which contains policies addressing facilities financing and prioritization. The Draft General Plan contains detailed policies on how to ensure the timely and adequate provision of public facilities and services through development project evaluation and plan preparation and for community plans to be prepared to address community specific issues including the “location, prioritization, and the provision of public facilities.” The Draft General Plan also provides updated guidelines and policies for specific facilities and services to guide land use development and guard public safety.

Public Facilities Conditions and Guidelines

The following sections summarize the existing conditions and facilities guidelines for public facilities in the City of San Diego.

Libraries

The City’s existing library system is comprised of the Central Library and 35 branch libraries as shown on **Figure 2.2-3**. This figure also shows each library’s two-mile service area and existing (2004) population density (persons per acre) within each service area. **Figure 2.2-4** identifies library locations along with forecasted population density for the Year 2030. The Central Library, located in Downtown, functions as the hub of the library system, and all branches link to it for the delivery of their services. The Central Library serves as the headquarters for the system and supplements the limited collections which branch libraries can offer.

The library system conducts regular evaluations of services to adapt to service demands, take advantage of constantly evolving technology, and to provide for facility construction and maintenance costs. Such assessments contribute to the provision of adequate collections that are responsive to community needs. Technological advances will continue to redefine what and how information and materials are provided and other library services. Some of the City's strategic library goals entail enhancing the system's information infrastructure and customers' access to digital information and the internet. While available and applied technologies continue to influence the modern evolution of the library system, the need for physical library facilities will remain an integral aspect of the City's public services.

The Central Library houses the system's in-depth and retrospective collections and more than half a million unique titles. It serves as the major resource library for the San Diego region and beyond, and has the largest collection for the general public south of Los Angeles. Its resources include the largest government document collection and the only patent depository in the San Diego region which support and supplement the school, university, and special libraries in the area. The Serra Cooperative Library System's research center is located at the Central Library. The research center utilizes the collection to provide reference and inter-library loan services to other libraries in Region V of the Library of California, a multi-type library network which encompasses San Diego, Imperial, Riverside, San Bernardino, and Inyo counties.

In July 2002 the City Council approved the Library System Improvements Program which includes a new Central Library, 12 new branch libraries, and expansion of 12 existing branch libraries. The adopted program declared new and expanded branch libraries are to have a minimum of 15,000 square feet (City of San Diego, 2005). This adopted guideline has subsequently been applied to existing branch library facilities to determine needed capital improvements — expansion or replacement projects. In developing communities, current (1979 Progress Guide and General Plan) guidelines are used to evaluate the need for additional facilities. As of April 2007, 22 of 35 branch libraries are currently under the 15,000 square foot guideline. To date, libraries that have been completed under the improvements program include: Point Loma/Hervey (2003), La Jolla/Riford (2004), College/Rolando (2005), Otay Mesa-Nestor (2006), and Serra Mesa/Kearny Mesa (2006). The North University City Library is under construction and scheduled to open in 2007, and the Logan Heights Library should begin construction in June/July 2007 (Tilotta, 2007).

The Draft General Plan contains policies to develop a Central Library to serve as the major resource library and to design all branch libraries with a minimum 15,000 square feet of dedicated library space, with adjustments for community-specific needs.

Parks and Recreational Facilities

The City of San Diego has over 36,300 acres of existing developed and undeveloped park and open space lands that offer a diverse range of recreational opportunities. The City's parks, open space, trails, and recreation facilities annually serve millions of residents and visitors and play an important role in the physical, mental, social, and environmental health of residents and visitors. The park and recreation system includes population-based, resource-based and open space parks. Many of the adopted community plans for the City contain land use designations for park and

open space lands as shown on **Figure 2.2-5**. These parks contain various facilities and programmed activities.

- Population-based parks (commonly known as neighborhood and community parks) are located within or in close proximity to residential areas and are intended to serve the daily needs of the neighborhood and community. When possible, they adjoin schools in order to share facilities, and ideally are within walking distance of the residences within their service area.
- Resource-based parks are located at, or centered on, notable natural or man-made features (beaches, shorelines, canyons, habitat systems, lakes, historic sites, and cultural facilities). They are intended to serve the citywide population, as well as visitors.
- Open space parks are City-owned lands located throughout the City, consisting of canyons, mesas, and other natural landforms. Open space parks are intended to preserve and protect native plants and animals, while providing public access and enjoyment by the use of hiking, biking, and equestrian trails.

As the City has grown, so have the quantity, quality, and distribution of recreation opportunities. New parks and open spaces have been acquired and facilities and services have been expanded in response to population-based needs. Recreation activities in the form of cultural, athletic, sport, social, and craft programs have been developed to serve a wide variety of the population throughout the City at parks, recreation centers, skate parks, dog parks, golf courses, athletic fields, and public schools. **Table 2.2-1** provides a breakdown of the types and quantities of parks within the City.

Table 2.2-1 Existing Park and Open Space Acres within the City of San Diego

District	Population ¹	Population-Based Parks		Resource-Based Parks	Open Space Lands	Other Park Lands ²	Total Parks and Open Space (gross acres) ⁴	Dedicated Parks	Designated Parks	Joint Use School Sites Net Useable Gross	Other Public Agency Parks & Open Space ³
		Gross	Net Useable								
Central	313,559	314.0	250.3 296.83	1,126.5	446.7	0.0	1,887.2	1,272.3	150.1	11.1 11.1	32.6
Coastal	140,719	191.2	120.6 121.08	4,525.0	1,100.0	5,977.0	11,793.2	4,967.4	94.6	24.4 24.4	245.7
Eastern	253,843	899.6	381.2 350.25	0.0	7,118.8	0.0	8,018.4	1,225.0	6,093.3	96.9 96.9	0.0
North Central	208,099	450.0	306.9 330.44	476.8	1,993.6	0.0	2,920.4	492.9	250.4	48.1 48.1	1327.6
Northern	274,085	738.3	507.3 553.10	86.3	11,968.2	0.0	12,792.8	3,966.9	9,338.1	80.0 80.0	181.9
Southern	99,499	264.8	134.3 134.20	1.1	1,142.1	110.3	1,518.3	143.2	1,215.8	6.9 6.9	1,740.0
City Total	1,289,804	2,857.9	1,700.6 1785.9	6,215.7	23,769.4	6,087.3	38,930.3	12,067.7	17,142.3	267.4 267.4	3,527.8
Total acres per Thousand		2.22	1.328	4.82	18.43	4.72	30.18	9.36	13.29	.21	2.74

¹ SANDAG population estimate for 2004

² Includes cemeteries* (Mount Hope Cemetery) and stand alone facilities that are not within parks (Mount Hope Cemetery)(Cemeteries can be protected as dedicated parkland per City Charter Section 55)

³ Includes the following:

- Border Field State Park and Tijuana Estuary National Park – 2,531 ac.
- Heritage County Park – 7.8 ac.
- San Pasqual Battle Field State Historic Park – 1.9 ac.
- Torrey Pines State Reserve – 1,446.2 ac.
- Old Town State Park – 29.0 ac.
- Tijuana River Regional Park – 1,740.7 ac.
- Cabrillo National Monument – 160 ac.
- Port of San Diego – 81.5ac.
- Torrey Pines State Beach – 61.36 ac.

⁴ Total Parks and Open Space (gross acres) includes population-based parks, resource-based parks, open space lands and other park lands.

The number and type of recreational facilities and population-based park acres can vary between communities in the City. Neighborhood and community facilities in older urban communities generally tend to have fewer park facilities and acres than new suburban and master planned communities. In general, the reasons for this include, but are not limited to:

- Older urban communities were developed without specified park development guidelines or collection of park fees;
- Resource-based parks, such as Mission Bay Park and Balboa Park, serve both residents and visitors, but are not included towards meeting population-based park requirements because they typically do not include neighborhood/community serving facilities;
- Redevelopment that provides for additional housing also adds to the need for additional population-based park lands;
- Land readily available for development of population-based parks is limited; and
- Funding strategies and resources to enable planned and opportunistic land acquisitions are lacking.

The Draft General Plan recommends that population-based parks provide a minimum ratio of 2.8 useable acres per 1,000 residents. An accounting of existing population-based park acreages, by community planning area, is provided on **Table 2.2-2**. This table also has indications where there are park acreage deficits or surpluses based on the 2.8acre standard.

Given the existing acreage deficiencies shown on **Table 2.2-2** and the difficulty in obtaining land in urbanized communities, the Draft General Plan ~~allows the use of~~ includes the framework for developing alternative methods, or “equivalencies” to meet no more than 50 percent of the required park acreage within a community. While the City’s primary goal is to obtain land for park and recreation facilities, equivalencies are proposed as a means to provide recreation facilities where land constraints limit acquisition opportunities, or to satisfy community-specific park preferences. ~~The two categories of equivalencies are:~~

- ~~Alternatives, which provide additional parkland acreage (such as mini parks, joint use areas or portions of resource based parks with neighborhood park components and facilities) or recreation facility space (square footage); and~~
- ~~Enhancements, which are physical improvements to parkland that is currently owned or controlled by the City. They do not provide additional acreage or recreation facility space (square footage).~~

Implementation of “equivalencies” could result in additional park acreage, additional square footage of facility space, or enhancements to increase the usability of existing park lands. The Draft General Plan ~~further~~ recommends that a Park Master Plan be prepared to provide detailed criteria for the use of equivalencies and to identify specific projects that could be funded or provided through the use of equivalencies. ~~In the interim, a Council Policies on equivalencies is to be prepared.~~

Table 2.2-2 Community Planning Area Pop Based Park Summary

March-07

COMMUNITY PLANNING AREA	2006 Household Pop. Per SANDAG	Total Useable Required Acreage	PB Useable Acreage by CPA	CPA PB Park Ac. Useable Deficit/Surplus	
BALBOA PARK	2	0.00	0.00	0.00	Balboa Park serves surrounding communities
BARRIO LOGAN	3,300	9.24	8.00	-1.24	
BLACK MTN. RANCH	4,633	12.97	20.12	7.15	
CARMEL MTN RANCH	12,632	35.37	19.82	-15.55	
CARMEL VALLEY	32,090	89.85	78.42	-11.43	
CENTRE CITY	23,641	66.19	57.75	-8.44	
CLAIREMONT MESA	79,633	222.97	117.40	-105.57	
COLLEGE AREA	16,793	47.02	2.85	-44.17	
DEL MAR MESA	525	1.47	3.17	1.70	
EAST ELLIOT	0	0.00	0.00	0.00	
ENCANTO (SESD)	48,161	134.85	58.26	-76.59	Balboa Park serves Golden Hill
FAIRBANKS C.C.	852	2.39	0.00	-2.39	
GREATER GOLDEN HILL	17,729	49.64	0.00	-49.64	
GREATER NORTH PARK	47,141	131.99	14.08	-117.91	
KEARNY MESA	4,211	11.79	2.40	-9.39	
LA JOLLA	29,715	83.20	43.84	-39.36	
LINDA VISTA	30,468	85.31	80.08	-5.23	
MID-CITY: CITY HEIGHTS	78,344	219.36	84.49	-134.87	
MID-CITY: EASTERN AREA	36,718	102.81	73.35	-29.46	
MID-CITY: KENSINGTON-TALM	14,127	39.56	2.12	-37.44	
MID-CITY: NORMAL HEIGHTS	17,132	47.97	7.57	-40.40	Mission Bay Park serves Mission Beach
MIDWAY-PACIFIC HIGHWAY	3,447	9.65	0.00	-9.65	
MIRA MESA	74,865	209.62	145.15	-64.47	
MIRAMAR RANCH NORTH	11,583	32.43	33.8998	1.46	
MISSION BAY PARK	841	0.00	NA	NA	
MISSION BEACH	5,377	15.06	0.00	-15.06	
MISSION VALLEY	17,055	47.75	0.00	-47.75	
NAVAJO	49,002	137.21	119.83	-17.38	
OCEAN BEACH	13,745	38.49	2.41	-36.08	
OLD SAN DIEGO	708	1.98	11.8355	9.57	
OTAY MESA	13,593	38.06	16.10	-21.96	
OTAY MESA-NESTOR	62,752	175.71	82.82	-92.89	
PACIFIC BEACH	41,035	114.90	30.25	-84.65	
PACIFIC HIGHLANDS	2,811	7.87	0.00	-7.87	
PENINSULA	36,686	102.72	32.75	-69.97	
RANCHO BERNARDO	39,409	110.35	86.50	-23.85	

Table 2.2-2 Community Planning Area Pop Based Park Summary

March-07

COMMUNITY PLANNING AREA	2006 Household Pop. Per SANDAG	Total Useable Required Acreage	PB Useable Acreage by CPA	CPA PB Park Ac. Useable Deficit/Surplus
RANCHO PENASQUITOS	48,468	150.70	91.66	-59.04
SABRE SPRINGS	10,850	30.38	15.56 14.82	-14.82
SAN PASQUAL	55	0.15	0.00	-0.15
SAN YSIDRO	27,310	76.47	35.28	-41.19
SCRIPPS MIRAMAR RCH	20,488	57.37	43.19	-14.18
SERRA MESA	22,483	62.95	49.39	-13.56
SKYLINE-PARADISE HLS	70,534	197.50	68.50	-129.00
SOUTHEASTERN SAN DIEGO	58,098	162.67	80.06	-82.61
TIAJUANA RIVER VALLEY	53	0.15	0.00	-0.15
TIERRASANTA	31,257	87.52	60.04	-27.48
TORREY HIGHLANDS	2,401	6.72	4.72	-2.00
TORREY HILLS	4,663	13.06	14.00	0.94
TORREY PINES	6,990	19.57	1.55	-18.02
UNIVERSITY	49,466	138.50	81.17	-57.33
UPTOWN	36,384	101.88	10.18	-91.70
VIA DE LA VALLE	454	1.27	0.00	-1.27
TOTALS	1,260,710	3,542.62	1,790.271,785.9	

Notes:

Population: 2006 projection SANDAG

Population-based parks include Mini, Joint-Use, Neighborhood, Community parks

Resource and Open Space Parks serve residents citywide and ARE NOT INCLUDED in this table

Population-based parks are required at 2.8 acres per 1000 population per ~~SD Muni.Code and~~ General Plan

CPA = Community Planning Area

PB = Population-based park

Source: Park and Recreation Department 2007

Schools

Within the City of San Diego there are numerous public and private educational institutions available for children and adults: universities and colleges; adult education facilities; community colleges; and the elementary and secondary schools. The Draft General Plan provides policy direction for the City to work with school districts and other education providers when planning for future facilities.

The San Diego Unified School District (SDUSD) is a pre-kindergarten to twelfth grade school district and provides educational services to approximately 80 percent of the City of San Diego. In addition to SDUSD, Poway Unified School District and 15 other districts including elementary and secondary levels service the more northern and southern areas of the City as shown on **Figure 2.2-6**.

Due to limited land availability in urban areas and increasing demand for schools, school districts have sometimes developed schools on sites that have required the removal of existing development and open space. The Draft General Plan provides policy direction for the City to work with school districts to design schools as community learning centers, and to work with school districts to better utilize land through development of multistory school buildings. The Draft General Plan also addresses the need to collaborate with school districts to site schools and education facilities to avoid areas with: fault zones; high-voltage power lines; major underground fuel lines; outside areas susceptible to landslides and flooding; excessive noise; industrial areas; hazardous material sites, significant motorized emissions, and environmentally-sensitive lands.

California Government Code section 65995 and Education Code section 53080 authorize school districts to impose facility mitigation fees on new development as a method of addressing increasing enrollment resulting from that development. State of California law currently requires a development fee of \$2.04/square foot of assessable area to assist in financing facilities needed to serve growth. Pursuant to Government Code section 65995, payment of development fees provides for full and complete mitigation of school impacts.

The City of San Diego is served by five community college districts: San Diego, Southwestern Grossmont, Palomar, and Mira Costa. Of the five, the San Diego community college district has all its facilities (three two-year colleges and six continuing education centers) within the City, which provides service to almost 100,000 students each semester. As a result of two recently approved bond measures, the district is in the process of renovating existing and constructing new educational facilities. In an effort to better serve the southern part of the City, the Southwestern Community College District is currently building a new education center in the Otay Mesa community.

The region's two largest universities, San Diego State University and University of California San Diego, are also located in the City. Due to a recent state Supreme Court case, San Diego State University (SDSU) is in the process of revising its 2005 Campus Master Plan and will be producing a new Environmental Impact Report (EIR). The EIR will identify significant environmental impacts, feasible mitigation measures, and SDSU's fair share obligations toward implementing these measures. The 2007 Campus Master Plan revision will allow SDSU to accommodate and house more students on campus and meet the growing demand for higher education. It will increase SDSU's enrollment capacity from 25,000 full-time equivalent students to 35,000. It also incorporates increased academic space, student housing and services, and faculty housing.

The 2004 Long Range Development Plan (LRDP) for the University of California, San Diego (UCSD) is a general land use plan and capacity analysis that guides the physical development of the campus through 2020. The LRDP projects a regular academic year enrollment of 29,900

students by 2020. Based upon academic and student life goals, the LRDP identifies institutional and development objectives, delineates campus land uses, and estimates the campus building capacity.

Fire-Rescue Services

Historically, the primary mission of the Fire-Rescue Department was to provide fire protection. Over the past two decades, the mission of the Department has expanded.

In addition to the wide variety of traditional fire suppression services such as structural, airport, marine, and vegetation firefighting, current services also include emergency medical services, water rescue, confined space rescue, cliff rescue, high angle rescue, hazardous material response, mass casualty incidents response, lifeguard and boating safety, and terrorism and weapons of mass destruction response services. The Fire-Rescue Department is also responsible for hazard prevention and public safety education.

A significant change in the mission of the Fire-Rescue Department occurred in 1997, when the San Diego Medical Services Enterprise limited liability corporation was formed through a partnership between the City of San Diego and Rural/Metro Corporation, to deliver paramedic services citywide. This program uses paramedics on fire engines and trucks, as well as the ambulance units, to provide advanced life support care.

San Diego acquired its full-time fire rescue helicopter, Copter 1, in July 2005. While supporting fire-fighting operations in the City and the region is the primary mission of the Copter 1, it also serves in hoist-air rescue, short-haul air rescue, offshore rescue, helicopter swift-water rescue, night vision goggle operations, patient transport, high-rise firefighting, vehicle rescue, large animal rescue, fire mapping, infrared detection, hazmat team and equipment transportation and disaster assessment.

As part of the development review process, the Fire-Rescue Department reviews proposed development projects to determine whether the project would substantially affect fire issue areas as well as the following response times:

- Five minutes from the time the alarm is received by the response unit to arrival of the first engine at the scene of the incident (1 minute chute + 4 minute travel); and
- Nine minute response time (1 minute chute + 8 minute travel) for initial full alarm assignment (3 engines and 1 truck).

The Draft General Plan contains policies calling for attainment of these established response times as well as additional more detailed level of service and response time objectives. The Fire-Rescue Department uses graduated percentage response times (fractal times) to depict the percentage of the first unit to arrive at the scene of the incident within five minutes of receiving the alarm as shown on **Figure 2.2-7**. Fractal times provide the best indicator of response time and coverage throughout the City.

The City's varied topography presents considerable demands on Fire-Rescue services and can also affect response times. For additional support, the City relies on numerous Automatic Aid Agreements with jurisdictions adjoining the City of San Diego. These agreements assure that the closest engine company responds to a given incident regardless of which jurisdiction they represent. Mutual Aid agreements with county, state, and federal government agencies further allow the City, and any other participating agency, to request additional resources depending on the complexity and needs of a given incident.

In 2004, the Comprehensive Public Safety Needs Assessment Report cited that funding shortfalls in the Fire-Rescue Department had created a backlog of needs estimated to require \$159 million to correct over a five-year period. Since this report was released, the City has increased funding to address this backlog which has allowed Fire-Rescue to begin correcting critical infrastructure and fleet replacement concerns that pose a significant threat to service delivery. Progress has been made in the replacement of emergency vehicles that have exceeded their service life and the construction of needed fire stations. The additional funding resources budgeted to Fire-Rescue are enhancing the ability of the department to meet the growing demand for services.

Currently, there are 47 fire stations strategically located throughout the City to provide emergency service coverage for all communities as well as nine permanent Lifeguard Stations as shown on **Figure 2.2-8**. However, during a failed attempt to gain national accreditation in 2005, it was noted that the City's inability to achieve compliance with national emergency response time standards of five minutes at 90 percent to the time, weighed heavily in the decision to deny accreditation. The City conducted an analysis of response models which indicated that an additional 22 fire stations would need to be built and appropriately staffed to meet this national standard.

Proper site location, funding, and timing of the development of a new fire station or expansion of an existing fire station require great effort and coordination. The Fire-Rescue Department is in the process of preparing a Fire Station/Lifeguard Facility Master Plan to identify a phased approach for the development of fire stations and lifeguard facilities that will address siting, priority of construction, and funding. In order to meet National Fire Protection Association 1710 standards for emergency response times and assure adequate emergency response coverage, the Fire-Rescue Department Master Plan for fire station construction will help assure that levels of service standards are attained for existing and future development. The Master Plan will identify the communities in which fire stations are needed and prioritize implementation based on the following risk assessment criteria: Population, Population Density per Square Mile, Firefighter per Capita, Building Density per Square Mile, Run Volume/Workload Distribution, Response Times, Square Miles Protected, Wildland/Urban Interface Areas, and Staffing Levels.

Figure 2.2-8 shows currently planned fire stations.

Typically, a 2 to 2.5 mile distance between fire stations is sufficient to achieve response time objectives. However, in order to address the potential effects that additional development in urban communities may have on service levels, the Draft General Plan contains a policy that requires a needs analysis when the yearly fire-rescue incident volume exceeds 2,500 responses. This measurement has been applied effectively since 2005 to assess increased demands for

service that negatively impact the availability of emergency responders and their ability to conduct critical non-emergency activities (e.g., training, vehicle/equipment maintenance, pre-fire planning, fire inspections). **Table 2.2-3** identifies fire station/lifeguard facility construction completed in FY 2006 and planned completion up to FY 2009.

Table 2.2-3 Fire Station/Lifeguard Facility Construction				
Community	Station No.	Equipment Assigned	Staffing	Date
Completed				
Mission Valley (Temp. Facility)	45	Engine	4	FY06
Pacific Beach Lifeguard Facility				FY06
Planned Completion				
Pacific Highlands Ranch	47	Engine	4	FY08
Black Mountain Ranch	48	Engine	4	FY09
Otay Mesa	49	Engine	4	FY09
Downtown-Bayside		Engine	4	FY09
University City		Engine/Truck	8	FY09
Boat Operations Dock				FY08

The Fire-Rescue fleet comprises 124 emergency response vehicles and 183 support vehicles. As identified during the recent Citywide Fleet Services Business Process Reengineering, 50 percent of the emergency fleet and 35 percent of the support fleet are beyond their expected life cycles. **Table 2.2-4** identifies apparatus additions and/or replacements that will help to improve the reliability, safety and expense challenges associated with the operation of an aging fleet. The Department has also identified the need to develop a long-term comprehensive vehicle replacement plan/program ensured the authorization and the funding for the acquisition of future fleet needs to replace emergency and support apparatus as they become outdated.

Table 2.2-4 Fire-Rescue Emergency Response Vehicle — Equipment Deliveries and Orders		
Type	Description	Community
Deliveries		
Ladder Truck	105' Service Aerial/Quint	North Park
Ladder Truck	105' Service Aerial/Quint	Rancho Penasquitos
Ladder Truck	105' Service Aerial	Golden Hill
Brush Engine	2400 Gal. All-Terrain w/ Pump	North Park
Brush Engine	2400 Gal. All-Terrain w/ Pump	San Ysidro
Brush Engine	2400 Gal. All-Terrain w/ Pump	University City
Battalion Command	Command Vehicle with Rear Command Module	College
Battalion Command	Command Vehicle with Rear Command Module	Mira Mesa
Battalion Command	Command Vehicle with Rear Command Module	Hillcrest
Division Command	Command Vehicle with Rear Command Module	Citywide

Air OPS Command	Command Vehicle with Rear Command Module	Citywide
Air OPS Fuel Tender	4500 Gal. Helicopter Fuel Tender	Citywide
Light & Air Units	Mobile Air Compressor and Lighting	Citywide (x2)
Surf Rescue Vessel	22' Multi-Purpose Surf Rescue Boat	Ocean
Surf Rescue Vessel	22' Multi-Purpose Surf Rescue Boat	Mission Bay
Orders		
Structure Engine	Triple Combination Pumper	Clairemont
Structure Engine	Triple Combination Pumper	Downtown (x2)
Structure Engine	Triple Combination Pumper	Mira Mesa
Structure Engine	Triple Combination Pumper	Mission Valley
Structure Engine	Triple Combination Pumper	Ocean Beach
Structure Engine	Triple Combination Pumper	San Carlos
Structure Engine	Triple Combination Pumper	Tierrasanta
Structure Engine	Triple Combination Pumper	Pacific Highlands Ranch
Ladder Truck	105' Service Aerial	Pacific Highlands Ranch
Ladder Truck	105' Service Aerial	TBD
Ladder Truck	100' Tractor Drawn Aerial	Downtown
Communications	Interoperability Trailer and Tow Vehicle	Citywide
Explosive Device Team	EDT Response Apparatus	Citywide

The Regional Public Safety Training Institute at the former Naval Training Center (NTC) is the Fire-Rescue Department's only training facility. The use of the training facility is being affected by the redevelopment of NTC. In addition, use of this single facility causes emergency crews to be out of their response districts for long periods of time. The Department has identified the potential future need to develop three smaller, strategically located training centers that would better serve the needs of the Fire-Rescue Department.

Fire-Rescue's emergency response helicopter, Copter 1, is vulnerable to being placed out of service for long periods of time in the event of mechanical failure or the need for routine scheduled maintenance. The Department has identified the potential future need to acquire a second aircraft that would ensure that an emergency response helicopter would be available at all times.

The past maintenance needs of Fire-Rescue facilities have been deferred due to limited availability of funds. Existing fire stations and lifeguard towers are in need of repair. It is anticipated that Fire-Rescue needs will be addressed as part of the Citywide effort to address deferred maintenance.

Growth will place an increasing demand on the capabilities of Fire-Rescue resources to deliver an acceptable level of emergency service. Service delivery depends on the availability of adequate equipment, sufficient numbers of qualified personnel, ongoing training, effective alarm/monitoring systems, and proper location and ongoing maintenance of fire stations, lifeguard facilities and training facilities. As fire-rescue facilities built prior to the 1970s and equipment continue to age, new investments must be made to support growth patterns and maintain levels of service to ensure public safety.

Police Service

The Police Department provides patrol, traffic, investigative, records, laboratory, and support services. The City works toward accomplishing its police and public safety goals by embracing the neighborhood policing philosophy and practice. Neighborhood policing requires shared responsibility between the City and residents in order to address underlying problems contributing to crime and the fear of crime. The City engages in a problem solving partnership with community groups, government agencies, private groups, and individuals to fight crime and improve the quality of life for the residents of San Diego. The City also strives to reduce crime and the perception of safety risks through application of Crime Prevention through Environmental Design (CPTED) concepts to build safer environments.

Until the 1980s, the City provided police services primarily from a centralized facility. In the 1970s, the City conducted studies that evaluated the benefits of decentralizing police functions. As a result, it was determined that several area stations throughout the City would provide improved service to individual communities. To accomplish this, the City implemented a twenty-year facilities plan that resulted in the construction of new area police stations and facilities as shown on **Figure 2.2-9**.

The demographics for the City and needs and technologies employed by the City in providing police services have changed since the last studies were conducted in the 1970s. Advances in laboratory services, information technology, and specialized units have presented a facilities challenge due to limited available space. Several of the area stations built during the 1980s are crowded and in need of improvements.

As part of the development review process, proposed development projects are reviewed by the Police Department to determine whether a project would affect police issue areas and priority response time goals. Priority E is the highest priority response level and accounts for less than four percent of the total calls for service. **Figure 2.2-10** shows existing (2006) Priority E average response times by police beat. The Priority one response level is just beneath Priority E in order of response level, but since these can account for 35 percent of emergency responses, they are considered to be a better indicator of existing (2006) average emergency police response times. **Figure 2.2-11** shows Priority one response times by policy. Unlike the Fire-Rescue Department in which fire units typically respond from stations, police units typically respond to calls while on patrol. The following is a description of the five response levels used by the Police Department:

Priority E: Dispatch Immediately. Priority E calls involve an imminent threat to life. Examples include: serious injury collisions; ambulance needed; attempted suicide; and no detail accidents.

Priority One: Dispatch Immediately. Priority One calls involve serious crimes in progress and those in which there is a threat to life. Examples include: felony crimes in progress; lost children; child abuse; prowlers; minor injury collisions; disturbances involving weapons or violence; hazardous material spills; bomb threat evaluations; and 911 hang-ups.

Priority Two: Dispatch as quickly as possible. Priority Two calls involve complaints regarding less serious crimes in which there is no threat to life. Examples include: prowlers who have left; traffic signals out of order; minor crimes in progress; blocked driveway when the caller is waiting to leave; injured animals; loud parties with mitigating circumstances; burglary alarms during extreme atmospheric conditions such as heavy wind, rain, and customers who refuse to pay for services.

Priority Three: Dispatch as quickly as possible after higher priority calls. Priority Three calls involve minor crimes or requests for service that are not urgent. Examples include: investigating a crime that has already occurred; taking a report; drunk persons who are conscious and not causing a disturbance; loud parties involving noise only.

Priority Four: Dispatch when no higher priority calls for the beat are waiting to be assigned. Priority Four calls involve minor requests for police service. Examples include but are not limited to: found property and most parking violations.

The Draft General Plan contains policies for maintaining average response time goals as growth occurs. In order to address the potential impacts that development may have on police service levels, the Draft General Plan contains a policy that requires a needs analysis when the 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 is defined as the time it takes police unit(s) to resolve a call for service after it has been dispatched to an officer. This administrative process was developed in conjunction with the new policy as a means for the department to evaluate growth impacts on police services and to execute appropriate strategies in response.

In 2006, the Police Department acquired new technology and equipment. The City has procured a fleet of four new Police Helicopters to replace the existing fleet. These new helicopters will help to improve the overall effectiveness of the Police Air Support Unit in providing service throughout the City. Approximately 75 field officers were issued Handheld Computers, which has significantly improved the effectiveness of select units in the field by providing the ability to check license plates, run DMV Records, access mug shot photo databases, and interface with online warrant systems, take pictures or video clips on scene, and record audio conversations. Ninety new police patrol vehicles have entered the police fleet. The Critical Response Team (CRT) was developed to provide a coordinated less lethal team response to subdue violent subjects. At the time of this writing, the Police Department is facing a challenge in the recruitment and retention of officers. To address this challenge, the San Diego Police Department has developed a Recruitment and Retention plan, which outlines a strategy to increase the pool of qualified applicants and retain its current personnel.

As growth occurs in the City under the guidance of the Draft General Plan, it is foreseeable that additional infrastructure, including new vehicles, technology, and equipment and additional or expanded police facilities, will be required to maintain and improve the City's police response time goals to ensure public safety.

Emergency Operations Center

The current Emergency Operations Center (EOC) meets the very basic needs of the City. Its location and limited space hampers the City's ability to increase functionality and efficiency to better serve the City's emergency managers. The City's Office of Homeland Security (OHS) has been looking into alternate locations to house the EOC. The site of the regional Law Enforcement Coordination Center, an intelligence fusion center, is being explored as a viable option for not only the EOC, but also for the Police Department and Fire-Rescue Department Operations Centers, the backup Police and Fire Communications Center, the Office of Homeland Security, and possibly the Police Department's Critical Incident Management Unit and its Criminal Intelligence Unit. The space under consideration is scheduled to be vacated in February 2008. If successful, a six-month buildout is anticipated. In the interim, plans are in place to upgrade the current EOC with better equipment that can be easily moved and incorporated into a new site. This upgrade is being funded with Homeland Security grant funds. OHS has also selected and outfitted an alternate EOC in the event the primary EOC is negatively impacted or otherwise unavailable for activation.

Water and Sewer Facilities

See EIR Section 3.14.1

City Street Network

As of June 2006, the City of San Diego consisted of approximately 2735 miles of streets as part of its street network. This includes: 2574 miles of asphalt streets; 111 miles of concrete streets and; 50 miles of unimproved streets. In addition, there are approximately 221 concrete or asphalt alleys and 37 miles of unimproved alleys.

The industry accepted roadway maintenance program, practiced by the California Department of Transportation and other major cities, is to keep 75 percent of the roadway system in acceptable condition at all times. The Street Division rates and monitors the conditions of streets using an Overall Condition Index indicator. The street rating system is based on the Overall Condition Index indicator and then placed into one of three categories: acceptable, fair and poor. The industry accepted street network consists of 75 percent acceptable, 20 percent fair, and 5 percent poor. According to a June 9, 2006 report to the Public Safety & Neighborhood Services Committee by the General Services Department, the most recent data from a 2003 street survey revealed that 40 percent of the streets are in acceptable condition, 42 percent fair and 18 percent are in poor condition. To obtain a street network that meets the acceptable industry percentages, 711 miles of streets would need to be overlaid, which is a new layer of asphalt, and 989 miles of streets would need to be slurry sealed, which is a thin layer of sand, emulsion and water to preserve the condition of existing asphalt (2006 Report No. 06-071).

2.3 HISTORY OF PROJECT CHANGES

Many notable citywide planning efforts were undertaken between the ~~adopted~~-adoption of the General Plan in 1979 and the start of the Strategic Framework Element in 1999 including, but not limited to the following: Guidelines for Future Development, Urban Form Workshop and

Action Plan, Livable Neighborhoods Initiative, Towards Permanent Paradise, Renaissance Commission Report, Transit-Oriented Development Design Guidelines (1998 San Diego, Carrier).

In 1999, the City started the planning process for the Strategic Framework Element. The goal of the SFE process was to establish a working vision and set of core values for the City that would guide future planning and development review efforts, and be the foundation for the comprehensive update to the 1979 General Plan. The SFE planning process integrated the work contained in planning documents generated by citizen committees, workshops, and City Council actions from previous years. It included five phases of public outreach as follows:

- Growth projections forums;
- Growth issues forums and Citizen Committee formed to guide development of the element;
- Alternative strategies and preferred strategy selection workshops and meetings,
- Citywide community planning group workshops; and
- Draft documents public review workshops and hearings.

In October of 2002, the San Diego City Council adopted the Strategic Framework Element and certified the Final Environmental Impact Report (LDR No. 40-1027; SCH No. 2001061069 dated August 27, 2002).

In January of 2003, following the SFE adoption, the City began the General Plan update process. The City used the SFE as a framework to comprehensively update the *Progress Guide and General Plan*. Since January 2003, over ~~25000~~ workshops, forums, presentations, and working meetings have been held with community planning groups, the Community Planners Committee ([CPC] — composed of members of each of the community planning groups), the general public, and stakeholder and interest groups. Workshops and presentations have been given to the full San Diego City Council, the Land Use and Housing Committee of the City Council, and the Planning Commission. The public and stakeholders have had opportunities to both receive information and provide input on the Draft General Plan at each of these public meetings.

The following is a summary of the Draft General Plan process:

- January 2003 – Following the SFE adoption, the City began the General Plan update process.
- April 2005 – The first draft General Plan (the Discussion Draft) was released for public review.
- May-June 2005 – The Discussion Draft was presented to nearly all of the community planning groups and numerous interest groups and stakeholders. Edits were made to the Discussion Draft based on written comments and comments provided at public meetings.
- July 2005 – The second Draft General Plan (July 2005 Draft) was released for public review. The Planning Commission, Land Use and Housing Committee, community planning groups, and various members of the public expressed concerns with this draft.
- August 2005 to July 2006 – The Draft General Plan was edited based on input from the public, elected officials, and Planning Commissioners. Interim working drafts of

individual elements were produced for public review. A subcommittee of the CPC provided a detailed review of the July 2005 Draft.

- May 2006 – Revised working drafts of the General Plan elements were posted to the City’s website.
- October 2006 – The October 2006 Draft General Plan was released for public review and work began on a Program EIR for the General Plan Update.
- September 2007 – The Public Hearing Draft General Plan was released for public review.

2.4 PROJECT DESCRIPTION

The proposed Project addressed by this Program EIR is the ~~October 2006~~ Draft General Plan. The Project also includes General Plan update companion items including: code amendments to eliminate references to the tier system; code amendments to Municipal Code Section 122.0101-122.0104 to either revise or eliminate the section to address revisions to Plan Amendment Initiation Criteria; and adoption of an ordinance to authorize implementation of the state Subdivision Map Act/Quimby Act and provides a methodology for collecting land and/or appropriate park fees from new subdivisions for population-based park and recreation facilities to serve future residents.

The Draft General Plan sets out a long-range vision and comprehensive policy framework for how the City could grow and develop, provide public services, and maintain the qualities that define San Diego over the next 20 to 30 years. The Draft General Plan does not change land uses, but rather provides the framework and policy direction for future community plan updates. The preparation of the Draft General Plan has been guided by the City of Villages growth strategy and citywide policy direction contained within the General Plan Strategic Framework Element.

Since less than four percent of the City’s land remains vacant and available for new development, the Draft General Plan policies focus on the reinvestment in existing communities needed to support additional development. The Draft General Plan policies supports development patterns that emphasize focusing future housing, retail, employment uses, educational, and civic uses, at different scales, in mixed-use village centers. By directing growth primarily toward village centers, the Draft General Plan supports the preservation of established residential neighborhoods and the management of growth over the long term. The City has developed the Draft General Plan within the context of state requirements, regional plans and population forecasts, and the issues and needs unique to the City of San Diego.

California mandates that all local jurisdictions prepare a general plan that establishes policies and standards for future development, housing affordability, and resource protection. With the exception of the Housing Element, the state does not mandate when a general plan should be updated, but it does encourage jurisdictions to keep general plans current through regular updates. A general plan must include the following mandatory elements: Land Use, Circulation, Housing, Conservation, Noise, Open Space, and Safety. However, the state provides flexibility in the presentation of elements and the inclusion of optional elements that best meet the needs of a jurisdiction. The Draft General Plan includes the following elements: Land Use and Community

Planning; Mobility; Economic Prosperity; Public Facilities, Services and Safety; Urban Design; Recreation; Historic Preservation; Conservation; and Noise. The update to the Housing Element was adopted by the City Council under a separate cover on December 5, 2006. Refer to **Section 2.4.1** for a summary of the December 2006 Housing Element 2005-2010. **Table 2.4-1** indicates where state-mandated and optional elements are located in the Draft General Plan.

**Table 2.4-1
Relationship Among Elements and Topics**

City of San Diego October 2006 Draft General Plan Element	Land Use & Community Planning	Mobility	Urban Design	Economic Prosperity	Public Facilities, & Services, & Safety	Recreation	Conservation	Historic Preservation	Noise	Housing¹
State of California Mandatory Elements										
Land Use	X		X	X						
Circulation		X			X					
Housing ¹										X
Conservation							X	X		
Open Space						X	X			
Noise									X	
Safety					X					
Optional Elements/Topics²										
Community Planning	X									
Coastal Resources	X						X			
Environmental Justice	X									
Urban Design			X							
Transit-Oriented Development	X	X	X							
Public Facilities					X					
Emergency Services					X					
Water					X		X			
Parks						X				
Sustainable Development							X			
Airports	X	X							X	
Prime Industrial Land	X			X						
Bio Diversity							X			
Cultural Resources								X		

1 The Housing Element is under a separate cover.

2 List of topics is not all-inclusive.

On October 22, 2002, the Strategic Framework Element (SFE) was adopted as a new element of the General Plan. The SFE, along with the Five-Year Action Plan, guided the preparation of the Draft General Plan. The SFE included the City of Villages strategy and policies addressing the preparation of the Draft General Plan. The City of Villages concept is a land use and growth strategy that supports the development of mixed-use village centers served by higher frequency transit service. The Draft General Plan incorporates and expands upon SFE policies. Although the SFE is included as a section in the Draft General Plan, the adoption of the Draft General Plan will replace the SFE.

The SFE Five-Year Action Plan was adopted as the implementation program for preparing the Draft General Plan as well as other actions. The Action Plan organizes actions under major goals, which link to the policy recommendations in the SFE. The Five-Year Action Plan is also being updated to identify action items that have been completed. A status report on the Five-Year Action Plan will be presented at the time of the General Plan adoption. A new Mayor's Action Plan will be created subsequent to the adoption of the General Plan.

The Draft General Plan was developed within the context of the regional planning efforts. The San Diego Association of Governments (SANDAG) serves as the transportation and planning agency for the region and is comprised of voting members from the 19 local jurisdictions in the county. SANDAG provides population, housing, employment, and travel forecasts for the region.

The SANDAG 2030 Regional Growth Forecast for the City of San Diego (September 2006) estimated that the population for the City was almost 1.3 million people in 2004. SANDAG has forecasted that the population will increase to 1.66 million people by 2030. In 2004, SANDAG estimated that the City had over 490,000 housing units. SANDAG has forecasted that there will be over 610,000 housing units by 2030. **Table 2.4-2** summarizes the SANDAG forecasted population and housing units in the City of San Diego from 2004 to 2030.

	2004	2010	2020	2030	2004 to 2030 Change	
					Numeric	Percent
Total Population	1,295,147	1,365,130	1,514,336	1,656,257	361,110	28%
Household Population	1,235,672	1,303,738	1,448,395	1,582,385	336,713	27%
Group Quarters Population ¹	49,475	61,392	65,941	73,872	24,397	49%
Civilian	33,033	43,797	48,346	56,277	23,244	70%
Military	16,442	17,595	17,595	17,595	1,153	7%
Total Housing Units	490,266	518,063	574,254	610,049	119,783	24%
Single Family	285,453	290,608	298,710	297,759	12,306	4%
Multifamily	188,772	210,832	254,441	291,354	102,582	54%
Mobile Homes	5,625	5,553	5,871	5,635	10	0%
Persons per Household	2.65	2.62	2.65	2.7	0.05	2%

1. The number of people living in group quarters, such as military barracks and college dormitories

SANDAG, September 2006, *2030 Regional Growth Forecast Update, City of San Diego*

In response to its forecasts, SANDAG prepares regional plans and studies addressing long-term regional land use, housing, employment, and transportation issues. These efforts include the Regional Comprehensive Plan (RCP), the Regional Transportation Plan (RTP) – Mobility 2030, and the Regional Housing Needs Assessment.

The RCP serves as the long-term planning framework for the region and was approved by the SANDAG Board of Directors in July of 2004. The RCP integrates local land use and transportation decisions. It contains an incentive-based approach to focus residential and employment growth into existing and future urban areas with the best existing and future transit connections, with the goal of preserving open space. The RCP includes an Integrated Regional Infrastructure Strategy and serves as a unifying document for a number of other regional initiatives covering topics such as housing, economic prosperity, habitat preservation, and environmental resource protection. The Draft General Plan is designed to complement and support the RCP.

The RTP – Mobility 2030 addresses the mobility challenges created by regional population and employment growth and was approved by the SANDAG Board of Directors on March 28, 2003. The RTP plans for and identifies 42 billion dollars worth of projects for multiple modes of transportation in order to achieve a balanced regional system. The Draft General Plan is consistent with Mobility 2030, and provides guidance on how to work with SANDAG in the future to help implement City policies and transportation project priorities.

The Regional Housing Needs Assessment (RHNA) contains the total number of housing units (107,301) that the 18 cities and county governments should plan for in their general plan housing elements for the 2005-2010 housing element cycle and was approved by the SANDAG Board of Directors on February 25, 2005. The RHNA also allocates each jurisdiction's housing needs into four income brackets: very low, low, moderate, and above moderate. The state requires that each jurisdiction identify enough multifamily zoned land or take other actions to accommodate their share of lower-income housing. The Housing Element identified adequate multifamily zoned land for the current housing element cycle consistent with state requirements and the RHNA. This Program EIR does not cover the Housing Element. The City Council adopted the Housing Element and certified an Addendum to EIR No. 40-1027 (the City of Villages Growth Strategy-Strategic Framework Element EIR) on December 5, 2006. Refer to **Section 2.4.1** for a summary of the adopted Housing Element.

The Draft General Plan is consistent with regional plans and strategies by addressing infrastructure challenges, establishing better linkages between transit and land use planning, preserving open spaces, strengthening existing communities, and creating neighborhood mixed-use centers. The Draft General Plan provides a comprehensive policy framework for addressing growth within the City of San Diego over the next 20 to 30 years.

2.4.1 Purposes and Objectives of the General Plan

The CEQA Guidelines Section 15124(b) requires a description of the project objectives. This section provides the overall goals of the Draft General Plan, along with summaries of the goals and

policies in the ten Draft General Plan Elements. The Draft General Plan’s guiding principals and primary objectives are to achieve:

1. An open space network formed by parks, canyons, river valleys, habitats, beaches, and ocean;
2. Diverse residential communities formed by the open space network;
3. Compact and walkable mixed-use villages of different scales within communities;
4. Employment centers for a strong economy;
5. An integrated regional transportation network of transit, roadways, and freeways that efficiently link communities and villages to each other and to employment centers;
6. High quality, affordable, and well-maintained public facilities to serve the City’s population, workers, and visitors;
7. Formation of historic districts and protection of sites that respect our heritage;
8. Balanced communities that offer opportunities for all San Diegans and share citywide responsibilities;
9. A clean and sustainable environment; and,
10. A high aesthetic standard.

The Draft General Plan reflects these principles through new policy direction in its nine elements, combined with the adopted Housing Element, which are summarized as follows:

Land Use and Community Planning Element

Purpose: To guide future growth and development into a sustainable citywide development pattern, while maintaining or enhancing quality of life in our communities.

The Land Use and Community Planning Element (Land Use Element) provides policies to implement the City of Villages strategy within the context of San Diego’s existing community planning program. 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 Land Use Element also covers local implementation of the California Coastal Act and the history and implementation of Proposition A – the Managed Growth Initiative of 1985.

Proposition ‘A’ – The Managed Growth Initiative (1985)

In 1985, the electorate adopted Proposition ‘A,’ an initiative amending the *Progress Guide and General Plan (1979)* to require approval of a majority vote of the people for shifting of land from the Future Urbanizing to the Planned Urbanizing Area phase of growth or development. The ballot measure further provided that the “provision restricting development in the Future Urbanizing Area shall not be amended except by majority vote of the people, and except for amendments which are neutral or make the designation more restrictive in terms of permitting development.”

By 2005, phase shifts, per Proposition ‘A’ and the Guidelines for Future Development, occurred for the land determined to be appropriate for more urban levels of development within the planning horizon of this Draft General Plan. The City also completed planning efforts to address land use in the remainder of the Future Urbanizing Area subject to its jurisdiction. The phased development areas system has, for the most part, expired. The City has grown into a jurisdiction with primarily two tiers: Proposition ‘A’ Lands and Urbanized Lands. The Land Use and Community Planning Element propose to identify non-phase shifted lands as Proposition ‘A’ lands and no longer refer to them as Future Urbanizing Area.

City of Villages Strategy

The City of Villages strategy is to focus growth into mixed-use activity centers that are pedestrian-friendly, centers of community, and linked to the regional transit system. A “village” is a place where residential, retail, employment, and civic uses are present and integrated. Implementation of the City of Villages strategy relies upon the designation and development of village sites. Implementation of the City of Villages strategy relies on community plans updates or amendments to include the designation of village locations. The hierarchy of village types and development areas are: Downtown, Subregional Employment Areas, Urban Village Centers, Community & Neighborhood Village Centers, and Transit Corridors.

Factors to consider when locating village sites include: community plan-identified capacity for growth, existing public facilities or an identified funding source for facilities, existing or an identified funding source for transit service, community character, and environmental constraints. Some of these factors, including, but not limited to the location of parks, schools, fire stations, and transit routes, have been mapped as shown on **Figure 2.4-1**, the Village Propensity Map. This figure also shows existing and community plan-designated land uses. By overlaying the facilities factors with the land uses, the Village Propensity Map illustrates existing areas that already exhibit village characteristics, and areas that may have a propensity to develop as village areas. The Village Propensity Map does not require, prohibit, or constrain development of villages. It is an illustrative tool, not a land use map. Actual village locations, precise village boundaries, the specific mix of uses, architectural form, needed public facilities, and the type of public space within proposed village areas will be determined through community plan updates or amendments.

Land Use and Street System

The Land Use Element identifies seven General Plan land use categories: Parks, Open Space and Recreation; Agriculture; Residential; Commercial Employment, Retail, and Services; Industrial Employment; Institutional, Public, and Semi-Public Facilities; and Multiple Use. The General Plan Land Use and Street System Map depicts these land uses, as shown on **Figure 3.8-1** (see Environmental Analysis – Land Use section). This map also identifies the planned street system, freeways, expressways, arterials, and collector streets needed to serve vehicular transportation demand resulting from the development of the City in accordance with the ~~October 2006~~ Draft General Plan. The map is based upon a composite of the more detailed land use and circulation system maps adopted for each community.

The seven land use categories permit a general, citywide view of land use distribution. For greater specificity, Draft General Plan identifies 26 “Recommended Community Plan Designations.” These designations were derived by grouping some 160 existing (2006) community plan

designations that share similar definitions. Standardized designations were developed so that over time, community plans will share a common terminology. These standardized designations are to be applied during community plan updates and amendments. No land use designation or zoning changes are proposed as a part of the General Plan update process.

Community Planning

The City of San Diego has more than fifty planning areas (see **Figure 2.2-1**). The earliest community plans were adopted in the 1960s. Each plan document is a unique reflection of the issues and trends facing the community and includes corresponding strategies to implement community goals.

Community plans are a vital component of the Land Use Element as they contain more detailed land use designations and describe the distribution of land uses more specifically than is possible at the citywide document level. San Diego is one of the few jurisdictions in the state that has the size, diversity, and land use patterns that necessitate community-based land use plans. The community-specific detail found in community plans is also used in the review process for both public and private development projects. While the community plan addresses specific community needs, its policies and recommendations must remain in harmony with other community plans, the overall General Plan, and citywide policies.

Community plans also implement state laws pertaining to provision of housing opportunities to meet the City's share of regional housing needs. As community plans designate land use and density, they must preserve or increase the planned density of residential land uses to ensure that the City is able to meet its share of the region's housing needs. Implementation of community-based goals may cause a shift in densities within or between community planning areas but together they must maintain or increase overall housing capacity. Community plans and other adopted land use plans are implemented through a broad range of zones, regulations and programs.

The City is currently developing a work program to regularly update all of the community plans over what is anticipated to be a 12-year cycle. Updates will be grouped into clusters to comprehensively assess potential opportunities and impacts that may cross community boundaries and to gain project management and environmental review efficiencies. Update clusters will be prioritized based on several factors such as the age/current utility of the existing community plans, the degree to which changes are needed to implement the General Plan, and available funding sources. The process for amending community plans is being revised. A proposed community plan amendment must meet a set of Plan Amendment Initiation Criteria contained in the Land Development Code prior to a Planning Commission public hearing for consideration for further review and study. With the Draft General Plan the Initiation Criteria was updated and will be relocated from the Land Development Code directly into the Land Use and Community Planning Element. See Section D, Plan Amendment Process, of the Land Use Element in the Draft General Plan for information on the new procedure.

Balanced Communities and Equitable Development

“Balanced communities” typically refer to communities that have a diverse mix of housing types that are suitable for households of various income levels. Balanced communities can contribute toward achievement of a fair and equitable society, and provide more people with the opportunity

to live near their work. Recent City initiatives that work toward more balanced communities and increase the supply and distribution of affordable housing include the Inclusionary Housing Ordinance (2003), the Strategic Framework Element/City of Villages strategy (2002), the Housing Element update (2006) and the ~~remainder of the October 2006~~ Draft General Plan. The City of Villages strategy strives to increase housing supply and diversity through the development of compact, mixed-use villages in specified areas. This strategy also helps to achieve some of the jobs/housing benefits of balanced communities at a broader scale by encouraging better links from homes to jobs and services throughout the region.

The City of Villages strategy also includes a commitment to equitable development and environmental justice. Equitable development is concerned with the creation and maintenance of economically and socially diverse communities. Environmental justice strives for fair treatment of all people with respect to development and implementation of environmental laws, policies, regulations and practices.

Measures to support equitable development will occur as part of village master plans or other long-range plans as appropriate. The ~~October 2006~~ Draft General Plan policies call for working toward environmental justice by broadening public input, prioritizing and allocating citywide resources to benefit communities in need, and striving for equity in environmental protection and in locating undesirable land uses, among other initiatives.

The specific goals for the Land Use Element are as follows:

- Mixed-use villages located throughout the City and connected by high quality transit.
- Land use categories and designations that remain consistent with the General Plan Land Use categories as community plans are updated and/or amended.
- Community plans that are clearly established as essential components of the General Plan to provide focus upon community-specific issues.
- Community plans that are structurally consistent yet diverse in their presentation and refinement of citywide policies to address specific community goals.
- Community plans that maintain or increase planned density of residential land uses in appropriate locations.
- Community plan updates that are accompanied by updated public facilities financing plans.
- Community plans that are kept consistent with the future vision of the General Plan through comprehensive updates or amendments.
- Approve plan amendments that better implement the General Plan and community plan goals and policies.
- Clearly define the process for amendments to community plans.
- A well-defined process that addresses how plan amendments occur.
- Allow for changes that will assist in enhancing and implementing the community's vision.
- Certification of community plans as the City of San Diego's Local Coastal Program (LCP) Land Use Plans.
- Preservation and enhancement of coastal resources.
- ~~Adopt z~~Zoning concurrently with community plan updates and amendments to ensure consistency with community plan land use designations.

- Zones or development regulations to better implement updated community plans.
- Protection of 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.
- 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.
- Ensure diverse and balanced neighborhoods and communities with housing available for households of all income levels.
- Community and neighborhood-specific strategies and implementation measures to achieve equitable development.
- Ensure a just and equitable society by increasing public outreach and participation in the planning process.
- Equitable distribution of public facilities, infrastructure and services throughout all communities.
- Improve mobility options and accessibility in every community.
- Promote and ensure environmental protection that will emphasize the importance of safe and healthy communities.
- Future growth and development that includes the public in the planning approval process.
- Identification of prospective annexation areas to limit urban sprawl, avoid duplication of urban services, and preserve open space.
- Annexation of county islands within the City of San Diego boundaries.

Mobility Element

Purpose: To improve mobility through development of a balanced, multimodal transportation network.

The Mobility Element's policies promote a balanced, multimodal transportation network that gets people where they want to go and minimizes environmental and neighborhood impacts. A balanced network is one in which each mode, or type of transportation, contributes to an efficient network of services meeting varied user needs. For example, the element contains policies that will make walking more attractive for short trips, and for transit to more effectively link often visited destinations, while still preserving automobility. In addition to addressing walking, streets, and transit, the element also includes policies related to regional collaboration, bicycling, parking, the movement of goods, and other components of a transportation system. Together, these policies advance a strategy for relieving congestion and increasing transportation choices in a manner that strengthens the City of Villages land use vision.

The Land Use and Community Planning, and Mobility Elements of the General Plan are closely linked. The Land Use Element identifies existing and planned land uses. The Mobility Element identifies the proposed transportation network and strategies that have been designed to meet the future transportation needs generated by these land uses. Mobility Element policies related to project design and multimodal facilities will be implemented through public and private development and CIP projects.

The City's transportation strategies and policies cannot be discussed in isolation. The ~~October~~ **2006** Draft General Plan is part of a larger body of plans and programs that guide the development and management of the transportation system.

- The RTP, prepared and adopted by the SANDAG, is the region's long-range mobility plan. The RTP plans for and identifies projects for multiple modes of transportation in order to achieve a balanced regional system. It establishes the basis for state funding of local and regional transportation projects, and its adoption is a prerequisite for federal funding. SANDAG prioritizes and allocates the expenditure of regional, state and federal transportation funds to implement RTP projects.
- The region's Congestion Management Program (CMP), prepared by SANDAG, serves as a short-term element of the RTP. It focuses on actions that can be implemented in advance of the longer-range transportation solutions within the RTP. The CMP establishes programs to mitigate the traffic impacts of new development and monitor the performance of system roads relative to Level of Service (LOS) standards. It links land use, transportation, and air quality concerns.

The Mobility Element, the RTP, and the CMP all highlight the importance of integrating transportation and land use planning decisions, and using multimodal strategies to reduce congestion and increase travel choices. The Mobility Element, and Public Facilities, Financing and Safety Element, contain policies on how to work effectively with SANDAG to help ensure that City of San Diego transportation priorities are implemented.

The specific goals of the Mobility Element are as follows:

- A city where walking is a viable travel choice, particularly for trips of less than one-half mile.
- A safe and comfortable pedestrian environment.
- A complete, functional, and interconnected pedestrian network, that is accessible to pedestrians of all abilities.
- Greater walkability achieved through pedestrian-friendly street, site and building design.
- An attractive and convenient transit system that is the first choice of travel for many of the trips made in the City.
- Increased transit ridership.
- A street and freeway system that balances the needs of multiple users of the public right-of-way.
- An interconnected street system that provides multiple linkages within and between communities.
- Vehicle congestion relief.
- Safe and efficient street design that minimizes environmental and neighborhood impacts.
- A transportation system which operates efficiently, saves energy and reduces negative environmental impacts.
- **Well maintained streets.**
- A safe transportation system.
- A transportation system that effectively uses appropriate technologies.
- Reduced single-occupant vehicular traffic on congested streets and freeways.

- Improved performance and efficiency of the street and freeway system, by means other than roadway widening or construction.
- Expanded travel options and improved personal mobility.
- 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.
- Environmental quality, public health and mobility benefits through increased bicycling.
- 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.
- Increased land use efficiencies in the provision of parking.
- An air transportation system that fosters economic growth.
- Adequate capacity to serve the forecasted passenger and cargo needs at existing airports.
- An air transportation system that is integrated with a multimodal surface transportation system that efficiently moves people and goods.
- An international airport to serve the region's long-term air transportation and economic needs.
- General aviation airport operations that support public safety, law enforcement, and aviation training activities and promote adjacent commercial and industrial uses.
- Military aviation installations that support national defense and the regional economic needs.
- Improved rail travel opportunities.
- Safe and efficient movement of goods with minimum negative impacts.
- An objective process for prioritization of transportation projects.
- Effective representation of City of San Diego interests in SANDAG decisions.
- Assured revenues to cover the costs of constructing, operating, and maintaining transportation facilities and providing needed transportation services.

Urban Design Element

Purpose: *To guide physical development toward a desired image that is consistent with the social, economic and aesthetic values of the City.*

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 describes the physical features that define the character or image of a street, neighborhood, community, or the City as a whole. Urban design is the visual and sensory relationship between people, and the natural and built environment. The built environment includes buildings, walkways 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.

San Diego's distinctive character results from its natural setting, including beaches, bays, hills, canyons and mesas that allow the evolution of geographically distinct neighborhoods. The

network of small human-scaled canyons creates a natural open space system that extends through many parts of the City. The topography and San Diego's year-round climate are ideal for outdoor pedestrian activities.

There are several urban design principles relating to the existing City form and a compact and environmentally sensitive pattern of development envisioned in the City of Villages strategy. These principles are identified below to provide a framework for the goals of the Urban Design Element:

- Contribute to the qualities that distinguish San Diego as a unique living environment;
- Build upon our existing communities;
- Direct growth into commercial areas where a high level of activity already exists; and,
- Preserve stable residential neighborhoods.

The Urban Design Element addresses urban form and design through policies that respect San Diego's natural environment, work to preserve open space systems and target new growth into compact villages. Urban form and how it functions becomes increasingly important as increases in density and intensity occur over time. The urban design principles established in this Element are intended to help achieve an identity for the City as a whole while encompassing its physical, social and cultural diversity. A higher overall quality of urban design is another fundamental goal. Urban design applies at multiple levels from citywide to community to neighborhood and ultimately to individual projects. Urban design is a process to foster quality in the built and natural environment as San Diego changes.

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 as it sets goals and policies for the pattern and scale of development and the character of the built environment. Urban design policies will be supplemented with site-specific community plan recommendations.

The specific goals of the Urban Design Element are as follows:

- 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, and opportunities for social interaction.
- A city with distinctive districts, communities, neighborhoods, and village centers where people gather and interact.
- Maintenance of historic resources that serve as landmarks and contribute to the City's identity.
- Utilization of landscape as an important aesthetic and unifying element throughout the City.
- A city of distinctive neighborhoods.
- Development that protects and improves upon the desirable features of San Diego's neighborhoods.
- Architectural design that contributes to the creation and preservation of neighborhood character and vitality.
- Innovative design for a variety of housing types to meet the needs of the population.
- Infill housing, roadways and new construction that is sensitive to the character and quality of existing neighborhoods.
- Pedestrian connections linking residential areas, commercial areas, parks and open spaces.

- Mixed-use villages that achieve an integration of uses and serve as focal points for public gathering as a result of their outstanding public spaces.
- Vibrant, mixed-use main streets that serve as neighborhood destinations, community resources, and conduits to the regional transit system.
- Neighborhood commercial shopping areas that serve as walkable centers of activity.
- Attractive and functional commercial corridors which link communities and provide goods and services.
- Promote the enhanced visual quality of office and industrial development.
- Provide increased pedestrian and transit orientation within office and industrial developments.
- Significant public gathering spaces in every community.
- Distinctive civic architecture, landmarks and public facilities.
- A city enhanced with distinctive public art and cultural amenities.

Economic Prosperity Element

Purpose: 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.

The structure of San Diego's economy influences the City's physical development and capacity to fund essential services. A strong economy creates wealth that makes continued investment in and maintenance of San Diego's infrastructure possible. Over the past several decades the structure of the City's economy has shifted from a production-based economy to one that is increasingly based on creativity and innovation. The Economic Prosperity Element seeks to create an environment that fosters this creativity and allows San Diego to best compete in the regional, national, and global economic setting. The Element links economic prosperity goals with land use distribution and employment land use policies. The Element also expands the traditional focus of a general plan to include economic development policies that have a less direct effect on land use. These include policies aimed at supporting existing and new businesses that reflect the changing nature of industry, creating the types of jobs most beneficial to the local economy, and preparing our workforce to compete for these jobs in the global marketplace. The Element also describes how the formation of redevelopment project areas can be used to implement community goals.

Employment Lands

San Diego's economic base is primarily composed of industries in the technological and professional services, manufacturing, visitor industries, national security, and international trade sectors. These "base sector" industries bring new wealth into San Diego by exporting goods, services, and intellectual property. Base sector industrial uses such as manufacturing, research and development, and support uses are especially desirable as they provide middle-income employment opportunities and livable wages. Non-base sector uses include public sector uses, commercial services, and retail trade to residents. These uses provide essential services and jobs for residents and are encouraged to locate in village and sub-regional employment areas. Non-base sector uses are directly proportionate to the size of the population and strength of the economic base; they cannot expand beyond the capacity of the economic base on which they are dependent.

| The ~~October 2006~~ Draft General Plan includes the following approaches to encourage base sector industrial uses to remain, locate, and expand in San Diego:

- **Community Plan Land Use Designations.** A range of community plan industrial land uses designations are provided to protect industrial lands through varying degrees of limitations on non-industrial uses.
- **Prime Industrial Lands.** Prime industrial lands are employment areas that support base sector industries. The Industrial and Prime Industrial Land Map identifies the City’s existing industrially-designated land and the subset of these lands that are Prime Industrial Lands. Residential and most non-industrial uses are not permitted within “prime” areas to protect base sector uses from potential land use conflicts and to maintain capacity for base sector industry growth.
- **Business Incentives.** City incentives programs are to be revised so that they offer increased benefits to projects and industries that have a demonstrated potential to provide middle-income jobs, and contribute to community revitalization.

An adequate supply of workforce housing is also an important factor in meeting the needs of businesses in San Diego. The City of Villages strategy encourages higher-density housing to be located in or near certain employment areas and village centers to better link jobs, housing and transportation. This integration of uses is encouraged in areas outside of the Prime Industrial Lands (based on an analysis of area characteristics) to help meet the City’s workforce housing needs. The Housing Element contains more detailed goals and strategies to increase the supply and affordability of housing in San Diego.

Economic Opportunities and Investments

The Economic Prosperity Element promotes economic opportunity for all segments of the population and development of workforce skills consistent with an evolving local economy. It includes policies to help the private sector create jobs for local residents, encourage career ladders and benefits for service sector employment, and to help increase access to education and training to meet today’s business needs. Additional policies are designed to encourage community revitalization through improving access to regional and national sources of public and private investment, to target infrastructure development to support economic prosperity, and to leverage the redevelopment process in certain communities.

While this Element establishes economic prosperity goals and policies, it also calls for the periodic preparation and more frequent updates of the City’s Community and Economic Development Strategy. The strategy will identify and monitor San Diego industries that are growing and are globally competitive. It will also translate policies into specific programs and near to mid-term actions, in response to changes in the global economy.

The achievement of economic prosperity goals also relies on the Land Use Element to appropriately designate land for economic development, the Mobility Element to provide a link between housing and jobs, and the Public Facilities, Services and Safety Element to address the development of regional facilities needed to reinforce the viability of our industrial areas.

The specific goals of the Economic Prosperity Element are as follows:

- A diversified economy with a focus on providing quality employment opportunities ~~and livable wages~~ for all San Diegans.

- A city with sufficient ~~employment~~, land and capacity for base sector industries ~~appropriately designated~~ to sustain a strong economic base.
- Efficient use of existing employment lands.
- ~~No loss of employment land for base sector industries that contribute significantly to the regional or local economy.~~
- Commercial development which uses land efficiently, offers flexibility to changing resident and business shopping needs, and assures maximum feasible environmental quality.
- Economically healthy neighborhood and community commercial areas that are easily accessible to residents.
- New commercial development that contributes positively to the economic vitality of the community and provides opportunities for new business development.
- A city with land appropriately designated to sustain a robust commercial base.
- A city where new employment growth is encouraged in the existing regional center and subregional employment areas connected by transit to minimize the economic, social, and environmental costs of growth.
- A city that provides life-long skills and learning opportunities by investing in excellent schools, post-secondary institutions, and opportunities for continuous education and training.
- Equitable access to educational opportunities.
- A city that will continue to incubate growth and investment by providing a skilled and educated workforce that meets industry needs.
- A broad distribution of economic opportunity throughout the City.
- A higher standard of living ~~through increased wages and benefits in low wage industries and an increase in citywide real median income per capita.~~
- A city with an increase in the number of quality jobs for local residents, including middle income employment opportunities and jobs with career ladders.
- A city able to retain, attract and maintain the type of businesses likely to contribute positively to the local economy. These industries contribute to a diverse economic base, maintain environmental quality, and provide high quality employment opportunities.
- A city focused on promoting local entrepreneurship to build locally based industries and businesses that can succeed in local, national, and international markets.
- A city with thriving businesses, particularly in existing urban areas.
- A city with opportunities for growth and expansion of small businesses.
- Community revitalization through enhanced access to regional and national sources of private and public funding.
- Public and private infrastructure that supports economic prosperity.
- A city which preserves the ability of military installations to achieve their mission and to remain in San Diego.
- A city that encourages investments in the tourism industry that also benefit existing residents and support community reinvestment.
- A city that recognizes the benefits of and promotes cultural heritage tourism in the overall economy.
- A city that takes advantage of its location as part of a greater interregional and bi-national area to be a strong competitor in the global marketplace.
- A city that actively promotes greater interregional and bi-national cooperation.

- Protection of the quality of life in the greater border region while keeping the region secure.
- Reliable and efficient passenger and commercial transportation systems along the U.S.–Mexico border.
- A city that promotes and protects waterborne industry and commerce through cargo and cruise terminals.
- An increase in commerce through enhancement of air cargo facilities and operations.
- San Diego’s working waterfront to continue to become a more vital part of the region’s economy and quality of life.
- A city which redevelops and revitalizes areas which were blighted, to a condition of social, economic, and physical vitality, consistent with community plans.
- An informed public decision making process providing economic information to the public and decision makers.

Public Facilities, Services, and Safety Element

Purpose: To provide the public facilities and services needed to serve the existing population and new growth.

Providing adequate public facilities to serve the City’s current and future population continues to be a great challenge. The Public Facilities, Services, and Safety Element (Public Facilities Element) responds to this challenge through policies that address public financing strategies, public and developer financing responsibilities, prioritization, and the provision of specific facilities and services that must accompany growth. The policies within the Public Facilities Element also apply to transportation, and park and recreation facilities and services.

The 1979 *Progress Guide and General Plan* established a growth management program to address the rapid growth on the periphery of the City, and the declining growth trend in the central areas of the City. The plan sought to revitalize the central business district, and phase growth and development in outlying areas in accordance with the availability of public facilities and services.

In 1979, the City was divided into three “tiers:” “Urbanized,” “Planned Urbanizing,” and “Future Urbanizing.” The Planned Urbanizing areas consisted of newly developing communities where development was required to “pay its own way” through the use of Facilities Benefit Assessments (FBAs), or other financing mechanisms. Growth was encouraged in urbanized communities, with the assumption that General Fund public capital improvement expenditures would be provided in those areas. Over time, the FBAs were largely successful in providing facilities in the then-developing communities, but the General Fund fell short in meeting the public facilities needs of urbanized communities. In addition, the City’s Development Impact Fee (DIF) program for the funding of public facilities in urbanized communities was not adopted until 1987.

The 2002 Strategic Framework Element identified the facilities deficit in urbanized communities, and reaffirmed the need to address existing and future public facility and service needs in those areas and throughout the City. The Strategic Framework Element was also the catalyst for an

effort to identify and map certain existing facilities in each of the City's community planning areas.

Facilities Financing

As the majority of San Diego's communities are now primarily "Urbanized," the ~~October 2006~~ Draft General Plan provides a multi-faceted facilities financing strategy framework to address existing needs, provide adequate facilities to support infill development, and plan for the ongoing need to fund operations and maintenance throughout the City.

Key points of the ~~October 2006~~ Draft General Plan financing strategy are that:

- The City and current population base are responsible for funding existing facilities deficiencies;
- Funding for existing public facilities deficiencies will come through diverse funding resources; and
- New development will pay its proportional fair-share of public facilities costs.

The Element identifies a menu of financing options that could be implemented in order for the City to meet its responsibility to correct existing public facilities deficiencies. To supplement the General Plan, a more detailed strategy to identify specific mechanisms for financing various facility types in targeted geographic areas will be prepared and updated more frequently as needs are reassessed and new mechanisms are developed.

Other implementation actions include anticipated amendments to the City's DIF methodology and public facilities financing plans. Under impact fee methodologies in place as of 2006, fees collected did not keep pace with escalating facility needs and costs, and were intended to only fund a proportional share of new facilities. It is expected that DIFs will need to be applied in more communities in the future as areas developed as planned urbanizing communities in the past experience infill development that was not anticipated in their FBAs. Legally, DIF and FBA funds continue to be eligible for funding capital improvements only and not operations or maintenance needs.

The ~~October 2006~~ Draft General Plan calls for the City to use objectively and systematically prioritize the financing of public facilities. The aim is to strengthen the relationship between the City's ~~October 2006~~ Draft General Plan and the annual Capital Improvements Program (CIP), to maximize efficiencies in the annual allocation of capital resources, and to implement the City of Villages strategy. Policies call for the City to use a standardized approach to facility prioritization that includes: identifying relevant criteria, evaluating projects based on that criteria, and producing a prioritized list of projects by facility type. Community plan conformance and preferences are to be a part of the prioritization process.

In evaluating new growth, the proposed project requires new development to mitigate its impacts and avoid making facility deficits worse. Key policies require development proposals to fully address impacts to public facilities and services, and require projects that necessitate a community plan amendment due to increased densities to provide or help fund physical improvements that benefit the affected community planning area. In addition, the project's policies call for the

establishment of a centralized development monitoring system; and for the maintenance of up-to-date public facilities financing plans to guide the provision of public facilities.

Facilities Guidelines

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, as shown on **Table 2.4-3, Public Facilities and Services Topics**.

Facility Type	Topics Addressed in Policies
Fire-Rescue	<ul style="list-style-type: none"> • Response time objectives for fire and emergency medical services • Annual emergency incident volume to evaluate impacts on services
Police	<ul style="list-style-type: none"> • Average response time goals for various priority calls • Guidelines for evaluating when additional resources are needed to maintain service levels
Wastewater	Wastewater treatment and disposal services, and infrastructure planning
Storm Water Infrastructure	<ul style="list-style-type: none"> • Storm water conveyance system • Storm water facility and service demands
Water Infrastructure	Water supply and infrastructure (see Conservation Element for water conservation)
Waste Management	Waste collection, reduction, recycling, and disposal
Libraries	Library planning and design guidelines
Schools	Coordination with districts on school design, location, and joint-use
Information Infrastructure	Integrated information infrastructure system
Public Utilities	<ul style="list-style-type: none"> • Collaboration with regional public utility providers in the planning and provision of their services and facilities • Consideration of utility investments in potential village areas
Regional Facilities	Planning and implementation of regional facilities and infrastructure investments
Healthcare Services and Facilities	<ul style="list-style-type: none"> • Participation with healthcare providers in facilities siting decisions • Integration with the City's growth strategy
Disaster	Preparation for man-made and natural disasters, and plans for restoration of municipal services
Seismic Safety	Seismic, geologic, and structural considerations in the built environment to protect health and safety
Recreational Facilities	See Recreation Element discussion
Streets	See Mobility Element discussion.

The specific goals of the Public Facilities, Services and Safety Element are as follows:

- Implementation of financing strategies to address existing and future public facility needs [citywide](#).

- Public facilities and services that are equitably and effectively provided through application of prioritization guidelines.
- Maximum efficiency in the annual allocation of capital resources for the CIP.
- Public facilities expenditures that are linked to implementation of the General Plan.
- Adequate public facilities that are available at the time of need. Development patterns supported by the timely and adequate provision of public facilities and services
- Public facilities exactions that mitigate the facilities impacts that are attributable to new development.
- Improvement of quality of life in communities through the evaluation of private development and the determination of appropriate exactions.
- Protection of life, property, and environment by delivering the highest level of emergency and fire-rescue services, hazard prevention, and safety education.
- Safe, peaceful, and orderly communities.
- Police services that respond to community needs, respect individuals, develop partnerships, manage emergencies, and apprehend criminals with the highest quality of service.
- Environmentally sound collection, treatment, reuse, disposal, and monitoring of wastewater.
- Increased use of reclaimed water to supplement the region's limited water supply.
- Protection of beneficial water resources through pollution prevention and interception efforts.
- A storm water conveyance system that effectively reduces pollutants in urban runoff and storm water to the maximum extent practicable.
- A safe, reliable, and cost-effective water supply for San Diego.
- Efficient, economical, environmentally-sound waste collection, management, and disposal.
- Maximum diversion of materials from disposal through the reduction, reuse, and recycling of wastes to the highest and best use.
- A library system that contributes to the quality of life through quality library collections, technologically improved services, and welcoming environments.
- A library system that is responsive to the specialized needs and desires of individual communities.
- A multi-level public and private school system that enables all students to realize their highest potential as individuals and as members of society.
- Educational facilities that are equitable, safe, healthy, technologically equipped, aesthetically pleasing, sustainable, and supportive of optimal teaching and learning for all students, and welcoming to parents and community members.
- A public school system that provides opportunities for students to attend schools within their residential neighborhoods as well as choices in educational settings outside their neighborhoods.
- Increased opportunities for connectivity in the information infrastructure system.
- An information infrastructure system that meets existing and future communication, access, and technology needs.
- An integrated information infrastructure system that enhances economic viability, governmental efficiency, and equitable universal access.
- A city that regulates and coordinates telecommunications to ensure and safeguard the public interest.
- Public utility services provided in the most cost-effective and environmentally sensitive way.

- 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.
- Regional facilities that promote and support smart growth and improve quality of life.
- Public and private healthcare services and facilities that are easily accessible and meet the needs of all residents.
- A city and region that, through diligent planning, organizing, and training are prepared for man-made and natural disasters.
- Reduced disruptions in the delivery of vital public and private services during and following a disaster.
- Prompt and efficient restoration of normal City functions and activities following a disaster.
- Protection of public health and safety through abated structural hazards and mitigated risks posed by seismic conditions.
- Development that avoids inappropriate land uses in identified seismic risk areas.

Recreation Element

Purpose: To preserve, protect, acquire, develop, operate, maintain, and enhance public recreation opportunities and facilities throughout the City for all users.

The City of San Diego has over 36,300 acres of park and open space lands that offer a diverse range of recreational opportunities. The City's parks, open space, trails, and recreation facilities annually serve millions of residents and visitors and play an important role in the physical, mental, social, and environmental health of the City and its residents. Parks can improve the quality of life by assisting in maintaining physical well-being. Mental and social benefits include providing visual relief from urban development, passive recreation, opportunities for social interaction, and healthy activities for youth. Park and open space lands benefit the environment by providing habitat for plants and animals, and space for urban runoff to percolate into the soil, while also serving to decrease the effects of urban heat islands. In addition, the City park system supports San Diego's tourism industry, and enhances the City's ability to attract and retain businesses.

San Diego's environment, its coastal location, temperate climate, and diverse topography, contribute to creating the City's first-class recreation and open space system for residents and visitors. The goals and policies of the Recreation Element have been developed to take advantage of the City's natural environment and resources, to build upon existing recreation facilities and services, to help achieve an equitable balance of recreational resources, and to adapt to future recreation needs.

It has become an increasing challenge to meet the public's park and recreational needs as resident and visitor populations grow and the availability of vacant land decreases. The City faces increased demand on existing park lands and an inequitable distribution of parks citywide. The problems are especially acute in the older, urbanized communities. The Recreation Element contains policies to address these challenges and to work toward achieving a sustainable, accessible, and diverse park and recreation system.

Parks and Open Space System

The City provides three categories of parks and recreation for residents and visitors: population-based, resource-based, and open space. These categories, including land, facilities and programming, constitute San Diego's municipal park and recreation system.

- Population-based parks (commonly known as Neighborhood and Community parks), facilities and services are located in close proximity to residential development and are intended to serve the daily needs of neighborhoods and communities. When possible, they adjoin schools in order to share facilities, and ideally are within walking distance of many residences within their service area.
- Resource-based parks are located at, or centered on, notable natural or man-made features (beaches, canyons, habitat systems, lakes, historic sites, and cultural facilities) and are intended to serve the citywide population, as well as visitors.
- Open space lands are City-owned land located throughout the City consisting of canyons, mesas, and other natural landforms. This open space is intended to preserve and protect native plants and animals, while providing public access and enjoyment through use of hiking, biking, and equestrian trails.

Park and Recreation Guidelines

The Recreation Element provides policies to guide the City's vision and goals for park and recreation facilities citywide and within individual communities. It sets 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.

Population-based parks are to be provided at a minimum ratio of 2.8 usable acres per 1,000 residents. Some of San Diego's newer communities come close to meeting this standard, but communities that were developed prior to the 1979 Progress Guide and General Plan fall well short of this goal. It is difficult to acquire parklands in already developed communities due to the cost of land and the desire to avoid displacement of existing land uses. In recognition of the City's land constraints, it is proposed that some of the 2.8 acres could be satisfied through "equivalencies," which are alternative ways to meet population-based park standards.

~~Equivalencies are further identified as "alternatives," a category of improvements that provide additional park land acreage or recreation facility space; and "enhancements" that provide physical improvements to park lands currently owned or controlled by the City.~~ While the provision of increased park acreage in underserved communities will still be aggressively sought, the application of "equivalencies" provides a flexible tool for satisfying some of the community-specific needs and demands in a timely manner.

The proposed Parks Master Plan is intended to provide criteria on how to apply the "equivalencies." In any case, the use of equivalencies is limited to no more than 50 percent of the required parklands. Equivalency determinations are to occur as part of the discretionary project review process with input from the community.

Parks Master Plan

The Recreation Element recommends that a Parks Master Plan be prepared subsequent to General Plan adoption. The Parks Master Plan will establish a citywide parks network, inventory and evaluate all City park lands, recreational uses, facilities, and services; set priorities for protection and enhancement of existing park and recreation assets, develop implementation strategies to meet community needs; address inequitable access to recreational resources; and establish the basis for a sound financing mechanism to develop, enhance and maintain the City's park network and recreational resources.

Park Financing

In addition to facing land constraints, the City has been continually challenged with financial constraints regarding park development, maintenance and operations. Therefore, it is essential that new parks and recreation facilities, and improvements to existing parks and facilities, be designed and constructed to endure their intended use with minimal funding for maintenance or upgrades during the expected useful life of the facility. Sustainable development features including water and energy conservation measures, "green" building technology, drought tolerant plantings, and design that is sensitive to local environmental conditions can help reduce long-term costs.

The key to providing increased recreation opportunities on a long-term basis is to identify and ensure adequate financing for park development, maintenance and staffing. The Recreation Element calls for the City to collect land and/or appropriate park fees for population-based park and recreation facilities to serve future residents. Cities and counties have been authorized since the passage of the 1975 Quimby Act (California Government Code §66477) to pass ordinances requiring that developers set aside land, donate conservation easements, or pay fees for park improvements. The Recreation Element recommends adopting an ordinance which authorizes implementation of the state Subdivision Map Act/Quimby Act and provides a methodology for collecting land and/or appropriate park fees from new subdivisions for population-based park and recreation facilities to serve future residents.

The Recreation Element is interconnected to other elements of the General Plan. In particular, the Conservation Element provides additional policies to protect and preserve recreational natural resources, canyons, and open spaces, and the Public Facilities Element provides policies on public facilities financing, prioritizing, and development impact fees. Overall, the City of Villages strategy reinforces the importance of recreation as an essential quality-of-life factor that needs to be integrated into every community.

The specific goals of the Recreation Element are as follows:

- A city with park and recreation facilities and services that are designed to accommodate the needs of a growing and diverse population and respect the City's natural landforms.
- A regional and citywide parks/open space system, including the bays, beaches, rivers, and other attractions that gives our region identity, attracts tourism and enriches the quality of life for residents and visitors.

- A city with a diverse range of active and passive recreational opportunities that meet the needs of each neighborhood/community and reinforce the City's natural beauty and resources.
- Preserve, protect and enhance the integrity and quality of existing parks, open space, and recreation programs citywide.
- Preserve, protect and enrich natural, cultural, and historic resources that serve as recreation facilities.
- A park and recreation system that provides an equitable distribution of park and recreation facilities that are designed to accommodate the needs of a diverse population.
- Park and recreation facilities that are sited to optimize access by foot, bicycle, public transit, automobile, and alternative modes of travel.
- Provision of an inter-connected park and open space system that is integrated into and accessible to the community.
- Recreational facilities that are available for programmed and non-programmed uses.
- Achievement of greater public benefit through shared use of recreational resources.
- An increase in recreational activities and programs through multi-agency coordination of interagency public lands, facilities and infrastructure uses.
- Joint use and lease agreements that contribute to the recreational and physical education needs of the community.
- 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.
- A system of pedestrian, bicycle, and equestrian paths linking communities, neighborhoods, parks, and the open space system.
- Preparation of a citywide, comprehensive Parks Master Plan to guide park and open space acquisition, design and development, recreational programming and needed maintenance over the next 20 to 30 years.
- A sustainable park and recreation system that meets the needs of residents and visitors.
- Provision of parklands that keep pace with population growth through timely acquisition and development.
- An increase in the amount and quality of recreation facilities and infrastructure through the promotion of alternative methods where development of typical facilities and infrastructure may be limited by land constraints.
- An equitable citywide distribution of and access to parks and recreation facilities.

Conservation Element

Purpose: To become an international model of sustainable development. To provide for the long-term conservation and sustainable management of the rich natural resources that help define the City's identity, contribute to its economy, and improve its quality of life.

Conservation is the planned management, preservation, and wise utilization of natural resources and landscapes. 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. Over the long term, conservation is the most cost-effective strategy to ensure that there will be a reliable supply of the resources that are needed now and in the future.

The City of Villages strategy to direct compact growth in limited areas that are served by transit is, in itself, a conservation strategy. Compact, transit-served growth is an efficient use of urban land that reduces the need to develop outlying areas and creates an urban form where transit, walking and bicycling are more attractive alternatives to automobile travel. Reducing dependence on automobiles reduces vehicle miles traveled which, in turn, lowers greenhouse gas emissions. Additionally, it improves water quality by decreasing automobile-related oil and gas leaks that pollute water bodies throughout the City.

Climate change is a growing concern for cities around the world. The burning of fossil fuels, such as coal and gasoline, as well as deforestation and other human activities are changing the composition of the atmosphere, causing concentrations of greenhouse gases such as carbon dioxide, nitrous oxide, and methane to increase significantly. The City of San Diego has taken steps to address climate change impacts at a local level. The City organization has continued to reduce its share of greenhouse gas emissions through fuel efficiency, energy conservation and the use of renewable energy, and the use of methane gas (biogas) to generate electricity and continues to investigate additional steps that can be taken to help reduce greenhouse gas emissions, identify adaptation goals, and curb the impact of climate change at a local level.

Sustainable development is development which respects the balance and relationship between economy, ecology, and equity. The City is implementing sustainable development policies that will reduce its environmental footprint, including: conserving resources, following sustainable building practices, reducing greenhouse gas emissions, and encouraging clean technologies. In sustainable development practices, economic growth is closely tied with environmental, "clean," or "green" technologies and industries. San Diego is well positioned to become a leader in clean technology industries due to its highly qualified workforce, world-class universities and research institutions, and established high technology industries. Clean technology industries demonstrate that environmental protection and economic competitiveness goals are aligned and mutually beneficial.

~~“Sustainable development is development that meets the needs of the present without compromising the ability of future generations to meet their own needs.” The City is implementing sustainable development policies that will reduce its environmental footprint, including: conserving resources, following sustainable building practices, reducing greenhouse gas emissions, and encouraging clean technologies. In sustainable development practices, economic growth is closely tied with environmental, “clean,” or “green” technologies and industries. Clean technologies incorporate practices and/or produce products that ultimately meet the goals of a sustainable community. San Diego is well positioned to become a leader in clean technology industries due to its highly qualified workforce, world class universities and research institutions, and established high technology industries. Clean technology industries~~

~~demonstrate that environmental protection and economic competitiveness goals are aligned and mutually beneficial.~~

~~Multiple conservation challenges and their solutions are inextricably linked. For example, almost sixty percent of the energy used by the City of San Diego (as an organization) is utilized for pumping water and sewage, so policies for water conservation also help save energy, which in turn reduces fossil fuel consumption and air pollution. The City of Villages strategy to direct compact growth in limited areas that are served by transit is, in itself, a conservation strategy. Compact, transit served growth is an efficient use of urban land that reduces the need to develop outlying areas and creates an urban form where transit, walking and bicycling are more attractive alternatives to automobile travel. Reducing dependence on automobiles reduces vehicle miles traveled which, in turn, improves water quality by decreasing automobile-related oil and gas leaks that pollute water bodies throughout the City.~~

The Conservation Element reflects key goals contained in many other City and regional plans and programs and will help guide their future updates. The Conservation Element sets forth a citywide vision that ties these various natural resource-based plans and programs together using a village strategy of growth and development. It 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.

The specific goals of the Conservation Element are as follows:

- 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.
- To become a city that is an international model of sustainable development and conservation.
- Preservation and long-term management of the natural landforms and open spaces that help make San Diego unique.
- Coastal resource preservation and enhancement.
- Clean coastal waters by continuing to improve the quality of ocean outfall discharges.
- Enhanced public access to the shoreline and coast.
- Effective long-term management of waters~~hed~~ resources so that ~~their~~ demand is in balance with efficient, sustainable supplies.
- A safe and adequate water supply that effectively meets the demand for the existing and future population through water efficiency and reclamation programs.
- Protection and restoration of water bodies, including reservoirs, coastal waters, creeks, bays, and wetlands.
- Preservation of natural attributes of both the floodplain and floodway without endangering life and property.
- Regional air quality which meet state and federal standards.
- Reduction in greenhouse gas emissions effecting climate change.
- Preservation of healthy, biologically diverse regional ecosystem and conservation of endangered, threatened, and key sensitive species and their habitats.

- Preservation of San Diego’s rich biodiversity and heritage through the protection and restoration of wetland resources.
- Preservation of all existing wetland habitat in San Diego through a “no-net-loss” approach.
- 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.
- Protection and expansion of a sustainable urban forest.
- Balance mineral production and conservation with habitat and topography protection.
- Retention of productive agricultural lands.
- Greater use of sustainable agriculture practices.
- Reduction in land use conflicts between agriculture and other land uses.
- Retention of the rural agricultural character of river valleys.
- A sustainable, safe, and healthy San Diego-Baja California border environment.
- Widespread public awareness of how the individual and cumulative actions of individuals, organizations, and businesses affect the environment.
- Provision of programs that increase awareness of and promote conservation.

Noise Element

Purpose: To protect people living and working in the City of San Diego from excessive noise.

Noise at excessive levels can affect the environment and quality of life. Noise is subjective since it is dependent on the listener’s reaction, the time of day, distance between source and receptor, and its tonal characteristics. At excessive levels, people typically perceive noise as being intrusive, annoying, and undesirable. The most prevalent noise sources in San Diego are from motor vehicle traffic on interstate freeways, state highways, and local major roads generally due to high traffic volumes and speeds. Aircraft noise is also present in many areas of the City. Rail traffic and industrial and commercial activities also contribute to the noise environment.

The City is primarily a developed and urbanized city, and an elevated ambient noise level is a normal part of the urban environment. However, controlling noise at its source to acceptable levels can make a substantial improvement in the quality of life for people living and working in the City. When this is not feasible, the City applies additional measures to limit the affect of noise on future land uses, which include spatial separation, site planning, and building design techniques that address noise exposure and the insulation of buildings to reduce interior noise levels.

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. This purpose becomes more relevant as the City continues to grow with infill and mixed-use development consistent with the Land Use and Community Planning Element.

The specific goals of the Noise Element are as follows:

- Consider existing and future noise levels when making land use planning decisions to minimize people’s exposure to excessive noise.

- Minimal excessive motor vehicle traffic noise on residential and other noise-sensitive land uses.
- Minimal excessive fixed rail-related noise on residential and other noise-sensitive land uses.
- Minimal excessive aircraft-related noise on residential and other noise-sensitive land uses.
- Minimal exposure of residential and other noise-sensitive land uses to excessive commercial and mixed-use related noise.
- Minimal exposure of residential and other noise-sensitive land uses to excessive industrial related noise.
- Minimal exposure of residential and other noise-sensitive land uses to excessive construction, refuse vehicles, ~~and~~ parking lot sweeper-related, and public noise.
- Balance the effects of noise associated with events with the benefits of the events.
- Attenuate the effect of noise on future residential and other noise-sensitive land uses by applying feasible noise mitigation measures.

Historic Preservation Element

Purpose: 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.

No city can hope to understand its present or to forecast its future if it fails to recognize its past. By tracing and preserving its past, a city can gain a clear sense of the process by which it achieved its present form and substance. San Diego's rich and varied historical and cultural resources include buildings, structures, objects, landscapes, districts, archaeological sites, and traditional cultural properties that possess historical, scientific, architectural, aesthetic, cultural, or ethnic significance. Although not always easily distinguishable, these resources, with their inherent ability to evoke the past, represent important aspects of the history of San Diego and the region, from the time before and during European contact with Native Americans to the recent past. The identification, evaluation, registration, and protection of these resources, and thereby the preservation of San Diego's past for its current and future residents, are the essential components of San Diego's historic preservation program.

The Historic Preservation Element contains goals and policies designed to integrate effective historic preservation into the larger planning process to achieve greater preservation of historical and cultural resources. It calls for the City to update its Comprehensive Historic Preservation Plan, which is to guide historic preservation efforts through identification of various implementation measures. The Historic Preservation Element recommends the continuation of existing programs and the development of new approaches as needed. As future growth in San Diego shifts attention from building on open land to a focus on reinvestment in existing communities, there will need to be a continued effort to protect historical and cultural resources.

The commitment of the City to historic preservation results in multiple economic benefits. It is widely recognized that where preservation is supported by local government policies and

incentives, designation can increase property values and pride of place. Revitalization of historic downtowns and adaptive reuse of historic districts and buildings conserves resources, uses existing infrastructure, generates local jobs and purchasing, supports small business development and heritage tourism, and enhances quality of life and community character.

The specific goals of the Historic Preservation Element are as follows:

- Identification of the historical resources of the City.
- Preservation of the City's important historical resources.
- Integration of historic preservation planning in the larger planning process.
- Public education about the importance of historical resources.
- Provision of incentives supporting historic preservation.
- Cultural heritage tourism promoted to the tourist industry.

Housing Element

Purpose: To create a comprehensive plan with specific measurable goals, policies and programs to address the City's critical housing needs.

The City faces a severe housing affordability crisis. Not only are low-income people and special needs populations having difficulty finding adequate affordable housing, but now many working people are finding it difficult to remain in San Diego due to the high cost of housing. The Housing Element identifies and analyzes the City's housing needs, establishes reasonable goals, objectives and policies based on those needs, and sets forth a comprehensive five-year program of actions to achieve, as fully as possible, the identified goals and objectives. The Housing Element includes objectives, policies and programs for the following five major goals:

- Provision of an adequate site inventory and new construction capacity.
- Maintenance and conservation (including preservation of existing low-income housing and rehabilitation of existing housing stock).
- Reduction of governmental constraints that are no longer necessary.
- Provision of affordable housing opportunities.
- Implementation of administrative goals (including fair share and community balance, use of redevelopment set-aside funds, reduction of housing discrimination, and energy conservation).

The Housing Element is intended to assist with the provision of adequate housing to serve San Diegans of every economic level and demographic group. The state directs that a Housing Element shall be updated at five-year intervals and shall "consist of standards and plans for the improvement of housing and for the provision of adequate sites for housing," and shall "make adequate provision for the housing needs of all segments of the community." The Housing Element was adopted by the City Council on December 5, 2006 under separate cover. In a February 5, 2007 letter from the state's Department of Housing and Community Development, the Department of Housing and Community Development has found the City of San Diego's Housing Element 2005-2010 to be in compliance with state housing element law.

The Housing Element update was distinct from the rest of the General Plan due to the need for frequent Housing Element updates to facilitate compliance with the state reporting requirements. The Housing Element is consistent with the other elements of the Draft General Plan and

incorporates the City of Villages strategy as one of its key components of the City's housing strategy.

Implementation Programs

The Housing Element differs from the other elements in the General Plan in several respects. The state requirements for the Housing Elements are more specific than for other General Plan elements and require that the City establish quantifiable goals, ~~be established and~~ and identify ~~hat~~ specific programs and responsible agencies/entities to ~~be identified to~~ meet those ~~ese~~ goals. There are a number of programs that are identified that are intended to implement the goals of the Housing Element. Some of the responsible agencies include the City of San Diego, the City of San Diego Redevelopment Agency, and the San Diego Housing Commission.

The San Diego Housing Commission is responsible for a large portion of the Housing Element programs. Historically, the Housing Commission's "core" assisted housing programs have included:

- Rental assistance
- Management of publicly owned apartment units
- Financing development of affordable housing units by other entities
- First-time homebuyer assistance
- Housing rehabilitation
- Special needs programs
- Self-sufficiency programs

These Housing Commission sponsored programs, with the respective federal, state and/or local administrative, financial and programmatic requirements, have assisted approximately 30,000 households on an annual basis.

The Redevelopment Agency is responsible for ensuring that the affordable housing requirements under the California Community Redevelopment Law are met in the City's 17 redevelopment project areas.

While the entire list of City housing programs is too numerous to list here, two key programs which encourage construction of affordable housing are described below.

Inclusionary Housing - The City has two inclusionary housing programs. Since 1992, a requirement has been in effect in portions of the North City that are now designated for urban uses. These areas were, until the 1990s, designated as "future urbanizing" areas. In these areas 20 percent of residential units constructed must be affordable to families earning no more than 65 percent of Average Median Income (AMI). Projects with more than ten units must build these affordable units on site or near the site of the market-rate units. Smaller projects may pay an in-lieu fee.

In 2003, San Diego adopted a citywide inclusionary housing program that is applicable in all portions of the City not included in the North City program discussed above. Developers are required to provide at least ten percent of the total dwelling units affordable to rental households earning no more than 65 percent of AMI or homebuyers earning no more than 100 percent of

AMI. Developers may pay an in-lieu fee rather than build units. The in-lieu fees will be used to build new affordable housing units, to acquire and rehabilitate multifamily units or for first time homebuyer assistance.

Each year the City reexamines this program and will continue to do so. Incentives are offered to offset the cost to developers of providing inclusionary housing. These include expedited permit processing, reduced sewer and water connection fees, multifamily bond financing for certain projects and density bonus. In addition, the City is considering an on-site density bonus for all projects that meet the inclusionary requirement on site.

Density Bonus Ordinance - The City is in the process of revising its Density Bonus regulations to conform with revised state law. In addition, the City is considering adoption of a local ten percent ministerial density bonus (On-Site Building Bonus) for projects that build required inclusionary units on site rather than paying an in-lieu fee. Based on recent trends and projects now in process utilizing existing and anticipated Density Bonus regulations, it is anticipated that approximately 375 affordable housing units will be added through FY 2010. Of these, approximately 125 will be affordable to moderate-income homebuyers, 125 units will be affordable to low-income renters and approximately 125 units will be affordable to very low-income renters.

Relationship of Housing Element to Other Elements of the General Plan

State law requires each element of the General Plan to be internally consistent with other elements of the General Plan. While some policies and proposals in the Housing Element will be modified during every five-year update, it will remain consistent with General Plan goals and the City of Village strategies. The Housing Element is consistent with principles and guidelines of the Draft General Plan.

To assure consistency of the Housing Element with other elements of the General Plan, the City commits to two actions: (1) evaluate each proposed community plan and General Plan amendment for impacts on the Housing Element, and (2) prepare an annual report summarizing progress made toward achieving Housing Element goals and summarizing cumulative impacts of community and General Plan amendments adopted during the year on the Housing Element.

The Housing Element anticipates that implementation of the policies of the General Plan will address some of the impediments to housing affordability. These include infrastructure deficiencies in older urbanized communities, fees, identification of potential additional development opportunities for residential and mixed-use development, and continued dialogue with the public and developers to strive for high-quality affordable and higher-density housing.

Since the Housing Element is required to be updated every five to seven years, it is anticipated that the next update to the Housing Element will remain consistent with General Plan goals and the City of Village strategy and will be more similar in formatting while still meeting state requirements.

General Plan Implementation

The General Plan provides a broad range of citywide policies that affect land development and overall quality of life. General plan policies are statements that guide decision making and are adopted by City Council resolution. Policies differ from Land Development Code regulations which contain specific, enforceable standards and are adopted by ordinance. The policies within the City of San Diego's General Plan provide a framework to guide the physical development of the City and will be used to: guide community plan updates; review discretionary permits; and provide direction for public projects, master plans, and other implementation programs. As projects and future implementation actions are reviewed, individual actions are to be deemed consistent with the General Plan if, considering all its aspects, it will further the goals and policies of the plan and not obstruct their attainment.

When the Strategic Framework Element was adopted in 2002, there was an associated Five-Year Action Plan that outlined specific actions needed to implement the new Element. A new Action Plan is being prepared that corresponds to the elements of the General Plan, and identifies actions needed to implement General Plan policies. The Action Plan will be periodically updated, as needed, to indicate implementation progress, identify new initiatives designed to implement General Plan policies, or reflect shifting priorities over time.

Because San Diego is a large and diverse city, the General Plan relies upon the community plans (legally recognized as a part of the Land Use and Community Planning Element) to provide community-specific policies and recommendations. While community plans are in the process of being updated, there may be instances where the policies of the community plan and General Plan are not fully aligned. However, there are no land use or zoning inconsistencies between the General and any given community plans because the General Plan does not change community plan land use designations. The community plans are the final arbiter on issues of land use, density, and intensity. The General Plan and community plans are to play complementary roles to ensure that quality of life is maintained, essential community character is respected, and that public facilities are provided.

The City's adopted land use plans set the framework for the implementing regulations found in the Land Development Code. Despite that state law exempts charter cities from the zoning consistency requirement, it is the City of San Diego's practice to apply zoning that is consistent with community plan land use designations to ensure their implementation. Zoning is one of the primary plan implementation measures. As the California General Plan Guidelines 2003 state, "the success of a general plan, and in particular the land use element, rests in part upon the effectiveness of a consistent zoning ordinance in translating the long-term objectives and policies contained in the plan into everyday decisions." Zoning will be reviewed and changed as appropriate, especially at the time of a community plan update or amendment, to assure that revised land use designations or newly-applicable policies and recommendations can be implemented. New zoning options may be developed to better implement plan recommendations. Plan recommendations may also be implemented through subdivisions, in accordance with the Subdivision Map Act.

Additional implementation programs are referenced in more detail in the elements of the General Plan and Action Plan. Major implementation initiatives include the Public Facilities Financing Strategy, Economic Development Strategic Plan, Parks Master Plan, and other master plans and

strategies. Master plans and strategies offer more in-depth analysis and implementation actions associated with their topic areas than is desirable in the General Plan. However, the formation or amendment of such plans will be evaluated against the policies of the General Plan. There are also specific legislative, regulatory, administrative, and collaborative implementation actions that will be needed. The General Plan and the associated Action Plan will be monitored to measure its effectiveness in achieving goals. The General Plan Monitoring Report, initially prepared in 2004, measures progress through: 1) the Action Plan item implementation tracking 2) San Diego Sustainable Community Program Indicators, and 3) community economic indicators.

City of Villages Strategy

The City of Villages strategy will continue to help meet the long-term needs of the City through the incremental redevelopment of aging buildings and sites. Some of the activity centers or districts that have village characteristics are currently experiencing demand for intensified use and have infrastructure or financing for infrastructure available. These areas could develop in accordance with the City of Villages strategy in the next few years through comprehensive development plans. Sites that are currently developed with other uses may be the villages of the future. Many of San Diego's communities already have districts of different scales with village-like neighborhoods that will continue to evolve. A common feature of all the villages will be the addition of vibrant public places and the increased ease of walking between residences, transit stops, public facilities, and basic commercial uses. As the villages become more fully developed, their individual personalities will become more defined and their development patterns will become more varied and distinctive. Some of the villages may take on specialized functions that cannot be predicted at the present time.

The rate at which the City of Villages concept can be applied throughout the City will be determined largely by market demand, public support, and the rate at which infrastructure deficiencies can be remedied. Transit will be particularly crucial. As urban area transit service is improved, many potential village locations could begin to develop in accordance with the City of Villages concept. However, even if transit deficiencies and other infrastructure needs are fully addressed in the next two decades, it is likely that the transition from the current auto-oriented pattern of development to a more diversified pattern built with transit- and pedestrian-orientation will take many years to be fully achieved. The current automobile-dominated urban development pattern in San Diego has occurred over several decades and the incremental land use and transportation changes sought will likely take almost as long to realize.

Another significant factor that will influence the pace at which the City of Villages strategy will be implemented is the rate of future population growth in the San Diego region. The pattern of development envisioned in the City of Villages strategy will not be affected by the rate of growth, but the number of villages, and the demand for development within individual villages, will be influenced in part by population growth pressures. A demographic trend that could influence implementation of the City of Villages strategy is the steadily increasing proportion of elderly among the City's population as the Baby Boom generation ages. Many elderly people are unable to, or choose not to drive as frequently. The creation of a more pedestrian- and transit-oriented urban pattern around village centers will provide more options to the elderly than the auto-oriented pattern of development that has prevailed in the past. Under the City of

Villages strategy, many elderly may choose mixed-use, mixed-income neighborhoods that are accessible by transit or walking to a full-range of services and facilities.

It should also be noted that future environmental, political, and economic conditions, and other factors that cannot be predicted at the present time could affect the rate and scale of San Diego's growth and development.

~~Community plans will play a major role in the implementation of the General Plan. They provide the site-specific recommendations that translate policies into actions. Other major implementation initiatives include the Public Facilities Financing Strategy, Economic Development Strategy, Parks Master Plan, and Housing Strategy. There are also specific legislative, regulatory, administrative, and collaborative implementation actions that will be needed. These actions will be addressed in the Draft General Plan—Action Plan that will outline a five-year work program proposed to implement the General Plan and will be updated on a regular basis. While the Action Plan will identify near- and mid-term implementation actions, the Draft General Plan contains additional proposals that will be actively pursued and implemented over the long term.~~

~~The General Plan will be monitored to measure its effectiveness in achieving goals through the use of the following:~~

- ~~▪ Action Plan item implementation tracking;~~
- ~~▪ San Diego Sustainable Community Program Indicators; and~~
- ~~▪ Community economic indicators.~~

~~In addition, SANDAG produces a comprehensive Monitoring Report that presents detailed data to measure performance toward implementing goals from each of the chapters of the RCP that can also be used to assist in the implementation monitoring of similar goals and policies in the Draft General Plan.~~

~~The City of Villages strategy contained in the Draft General Plan will continue to help meet the long-term needs of the City through the incremental redevelopment of aging buildings and sites. Some of the urban nodes contemplated as future villages are currently experiencing demand for intensified use and have infrastructure or financing for infrastructure available. These nodes could develop in accordance with the City of Villages strategy in the next few years through comprehensive development plans. Sites that are currently developed with other uses may be the villages of the future. Many of the communities throughout the City already have village-like neighborhoods or districts that will continue to evolve. A common feature of all the villages will be the addition of vibrant public places and the increased ease of walking between residences, transit stops, public facilities, and basic commercial uses. As the villages become more fully developed, their individual personalities will become more defined and their development patterns will become more varied and distinctive. Some of the villages may take on specialized functions that cannot be predicted at the present time.~~

~~The rate at which the General Plan policies can be implemented throughout the City will be determined largely by the rate at which community plans can be updated, infrastructure deficiencies can be remedied, and public support strengthened. Transit will be particularly crucial.~~

~~As transit service is improved, many potential village locations could begin to develop in communities with updated plans or plans that currently support mixed use. However, even if transit deficiencies and other infrastructure needs are fully addressed in the next two decades, it is likely that the transition from the current auto-oriented pattern of development to a more diversified pattern built with transit- and pedestrian-orientation will take many years to be fully achieved. The current automobile-dominated urban development pattern in San Diego has occurred over several decades and the incremental land use and transportation changes sought will likely take almost as long to realize.~~

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~~It should also be noted that future environmental, political, and economic conditions and other factors that cannot be predicted at the present time could affect the rate and scale of San Diego's growth and development.~~

The Draft General Plan is intended to provide a strategy for the future development of the City that values the distinctiveness of communities while recognizing that San Diego is a major metropolis. The Draft General Plan relies upon the community plans to provide the site-specific guidance to implement many of the Draft General Plan policies, and the continued involvement of an engaged citizenry to monitor its implementation.

Notes and References

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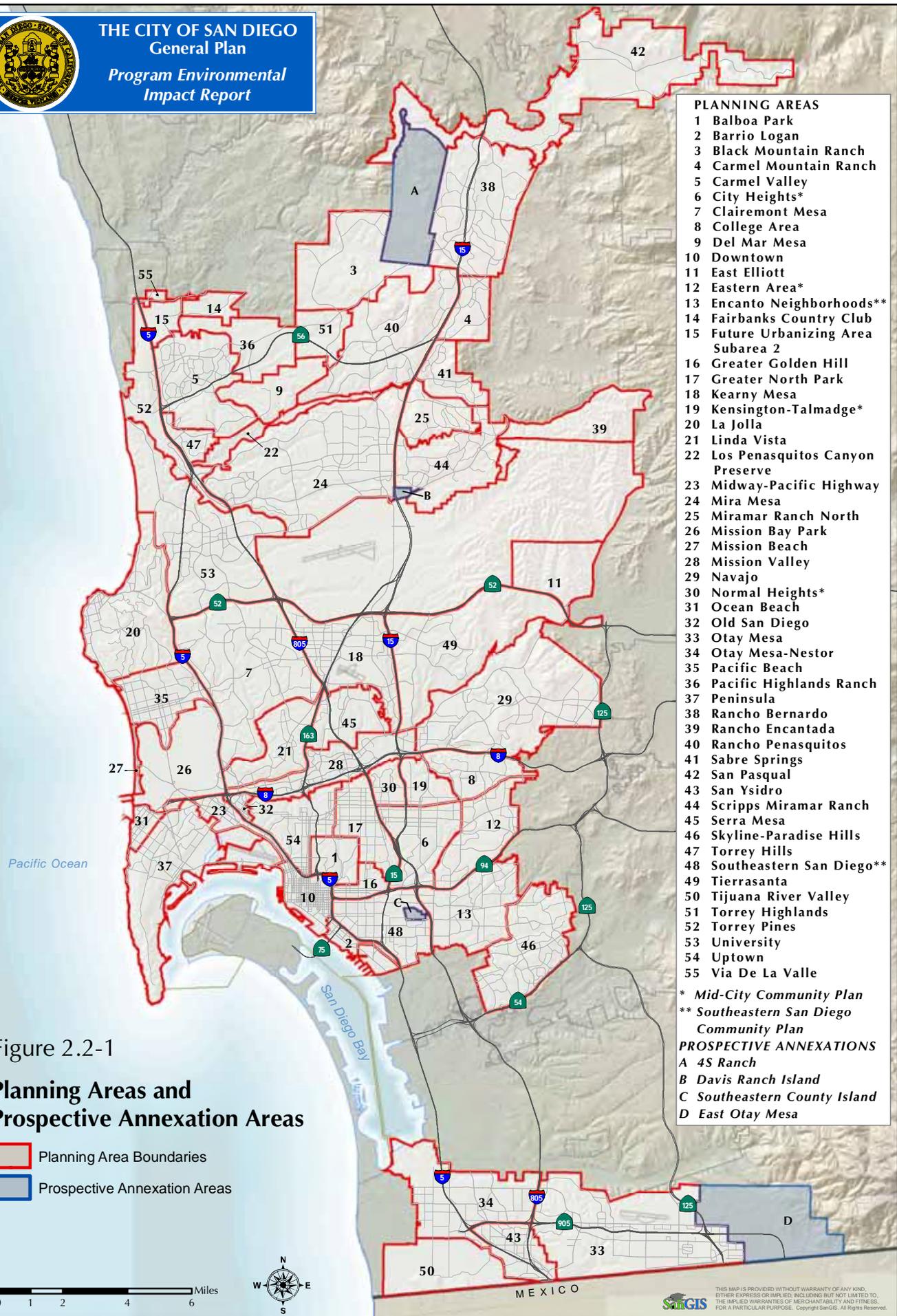
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Communications

Communication with Mary Ann Tilotta, Capital Improvement Projects - San Diego Public Library, City of San Diego. March 28, 2007.



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 General Plan
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- PLANNING AREAS**
- 1 Balboa Park
 - 2 Barrio Logan
 - 3 Black Mountain Ranch
 - 4 Carmel Mountain Ranch
 - 5 Carmel Valley
 - 6 City Heights*
 - 7 Clairemont Mesa
 - 8 College Area
 - 9 Del Mar Mesa
 - 10 Downtown
 - 11 East Elliott
 - 12 Eastern Area*
 - 13 Encanto Neighborhoods**
 - 14 Fairbanks Country Club
 - 15 Future Urbanizing Area Subarea 2
 - 16 Greater Golden Hill
 - 17 Greater North Park
 - 18 Kearny Mesa
 - 19 Kensington-Talmadge*
 - 20 La Jolla
 - 21 Linda Vista
 - 22 Los Penasquitos Canyon Preserve
 - 23 Midway-Pacific Highway
 - 24 Mira Mesa
 - 25 Miramar Ranch North
 - 26 Mission Bay Park
 - 27 Mission Beach
 - 28 Mission Valley
 - 29 Navajo
 - 30 Normal Heights*
 - 31 Ocean Beach
 - 32 Old San Diego
 - 33 Otay Mesa
 - 34 Otay Mesa-Nestor
 - 35 Pacific Beach
 - 36 Pacific Highlands Ranch
 - 37 Peninsula
 - 38 Rancho Bernardo
 - 39 Rancho Encantada
 - 40 Rancho Penasquitos
 - 41 Sabre Springs
 - 42 San Pasqual
 - 43 San Ysidro
 - 44 Scripps Miramar Ranch
 - 45 Serra Mesa
 - 46 Skyline-Paradise Hills
 - 47 Torrey Hills
 - 48 Southeastern San Diego**
 - 49 Tierrasanta
 - 50 Tijuana River Valley
 - 51 Torrey Highlands
 - 52 Torrey Pines
 - 53 University
 - 54 Uptown
 - 55 Via De La Valle
- * Mid-City Community Plan**
**** Southeastern San Diego Community Plan**
- PROSPECTIVE ANNEXATIONS**
- A 4S Ranch**
B Davis Ranch Island
C Southeastern County Island
D East Otay Mesa

Figure 2.2-1
Planning Areas and Prospective Annexation Areas

Planning Area Boundaries
 Prospective Annexation Areas





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Riverside
 County



County of San Diego

Imperial
 County

Pacific Ocean

**City of
 San Diego**

MEXICO

Figure 2.2-2

Vicinity Map

- San Diego County
- City of San Diego



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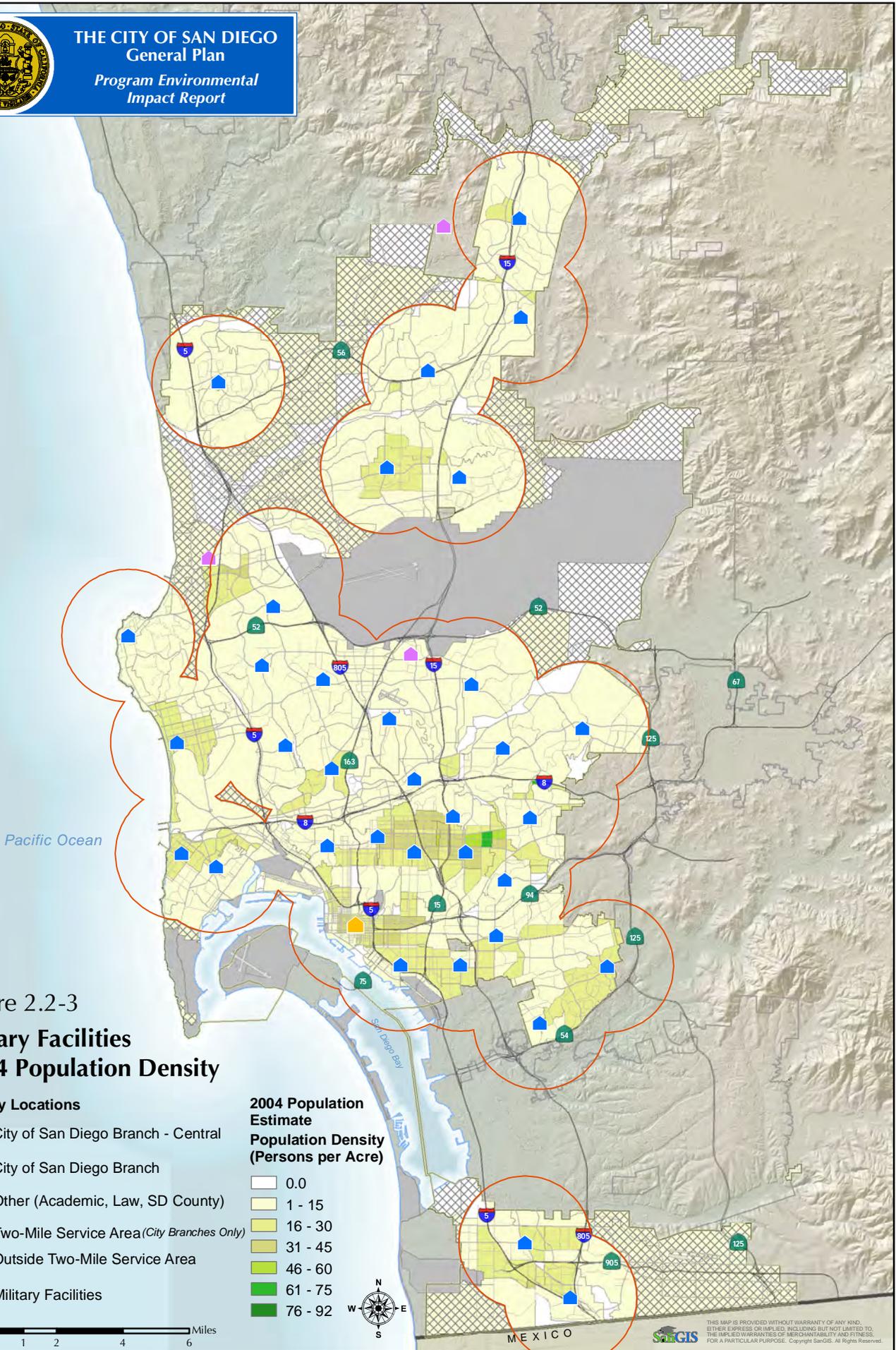


Figure 2.2-3
Library Facilities
2004 Population Density

Library Locations

- City of San Diego Branch - Central
- City of San Diego Branch
- Other (Academic, Law, SD County)
- Two-Mile Service Area (City Branches Only)
- Outside Two-Mile Service Area
- Military Facilities

2004 Population Estimate
Population Density
(Persons per Acre)

- 0.0
- 1 - 15
- 16 - 30
- 31 - 45
- 46 - 60
- 61 - 75
- 76 - 92

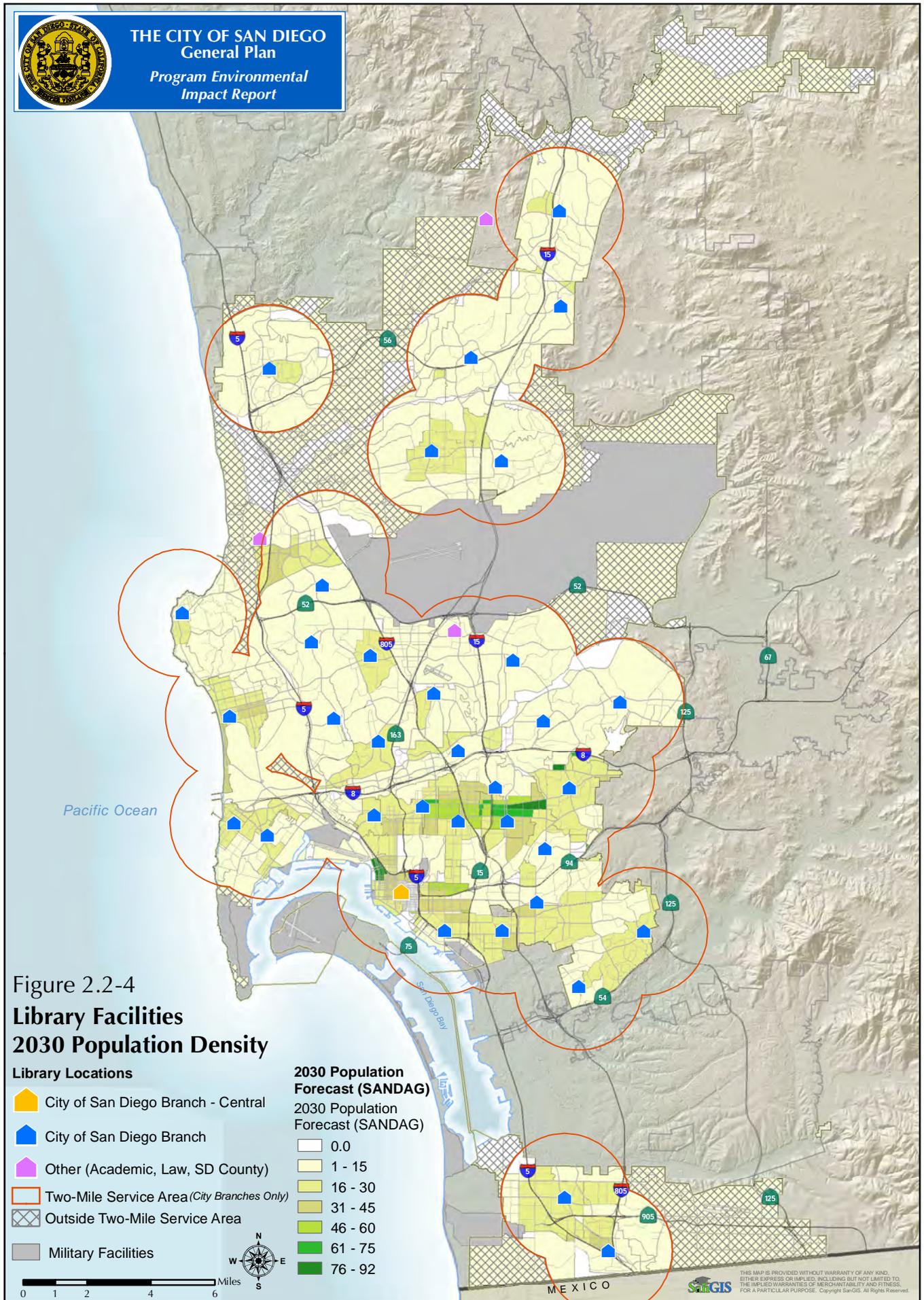
0 1 2 4 6 Miles



MEXICO



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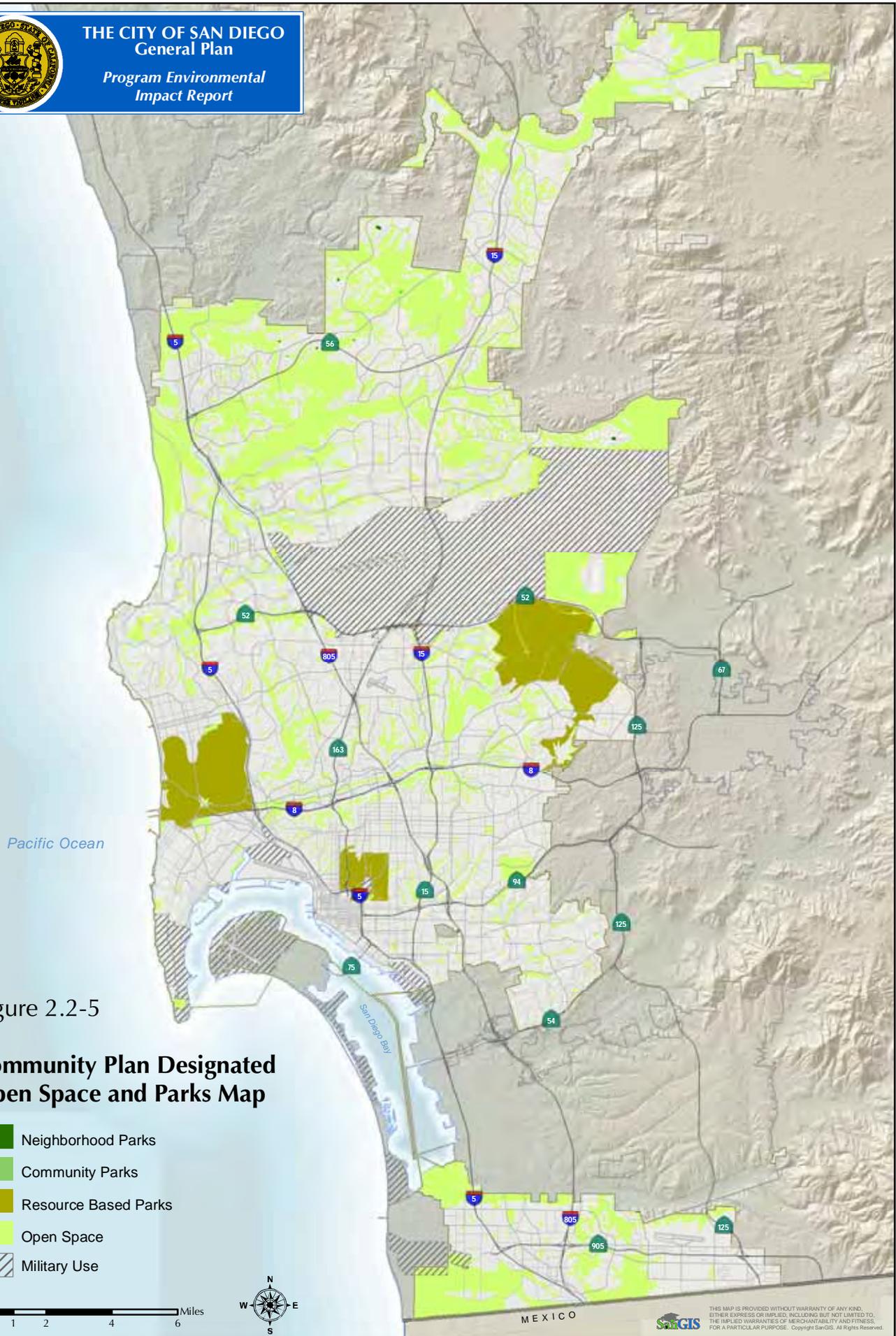


Figure 2.2-5

**Community Plan Designated
 Open Space and Parks Map**

- Neighborhood Parks
- Community Parks
- Resource Based Parks
- Open Space
- Military Use

0 1 2 4 6 Miles



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VALLEY
CENTER-
PAUMA
UNIFIED

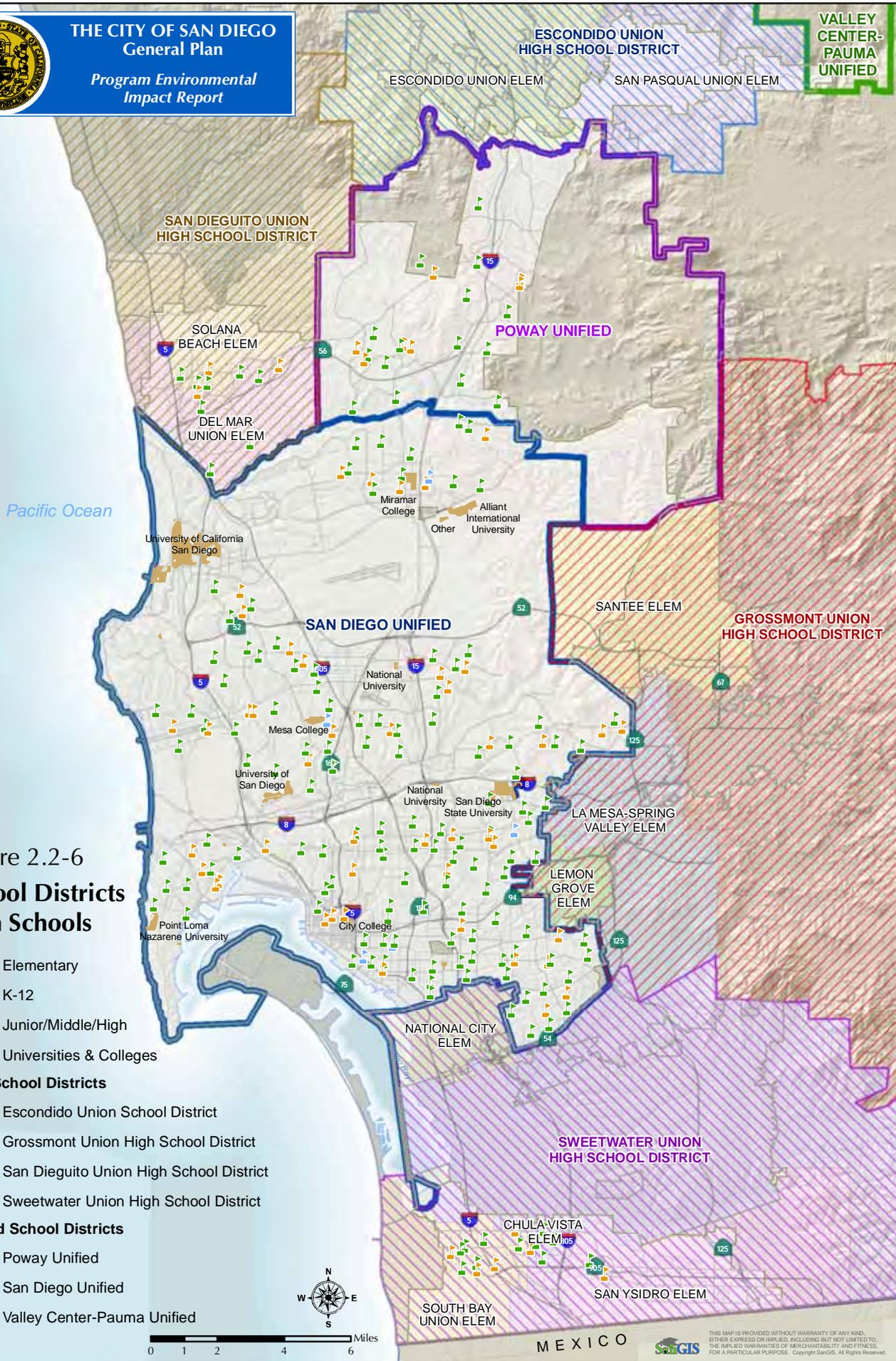


Figure 2.2-6
**School Districts
with Schools**

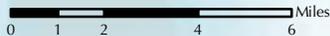
- Elementary
- K-12
- Junior/Middle/High
- Universities & Colleges

High School Districts

- Escondido Union School District
- Grossmont Union High School District
- San Dieguito Union High School District
- Sweetwater Union High School District

Unified School Districts

- Poway Unified
- San Diego Unified
- Valley Center-Pauma Unified



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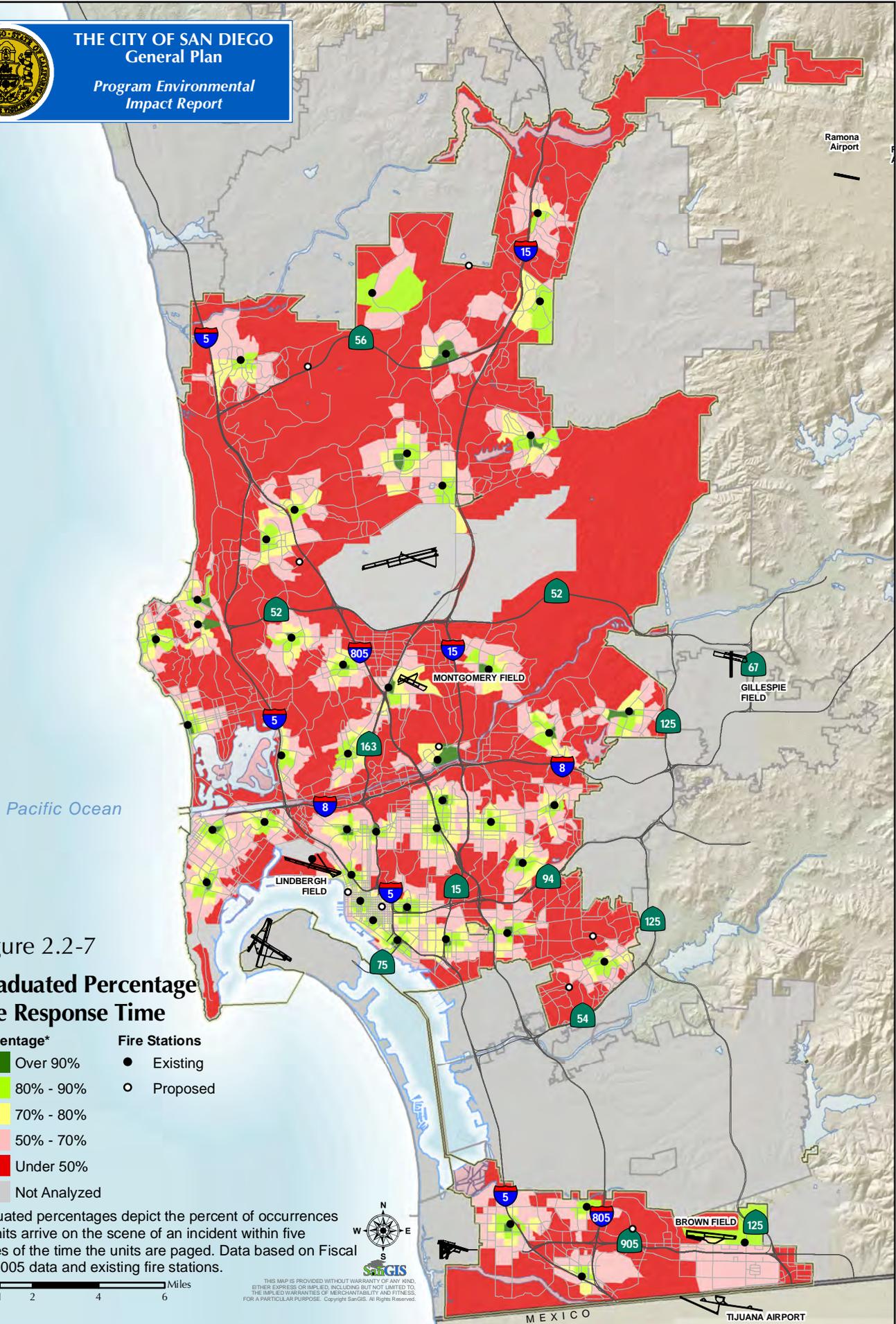


Figure 2.2-7

Graduated Percentage Fire Response Time

Percentage*	Fire Stations
Over 90%	● Existing
80% - 90%	○ Proposed
70% - 80%	
50% - 70%	
Under 50%	
Not Analyzed	

*Graduated percentages depict the percent of occurrences that units arrive on the scene of an incident within five minutes of the time the units are paged. Data based on Fiscal Year 2005 data and existing fire stations.

0 1 2 4 6 Miles

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Pacific Ocean

San Diego Bay

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Figure 2.2-8

Fire and Lifeguard Facilities

■ City of San Diego Lifeguard Stations

City of San Diego Fire Stations

- Existing
- Proposed

Outside City of San Diego Fire Stations

- ▲ Existing Stations
- △ Future Stations



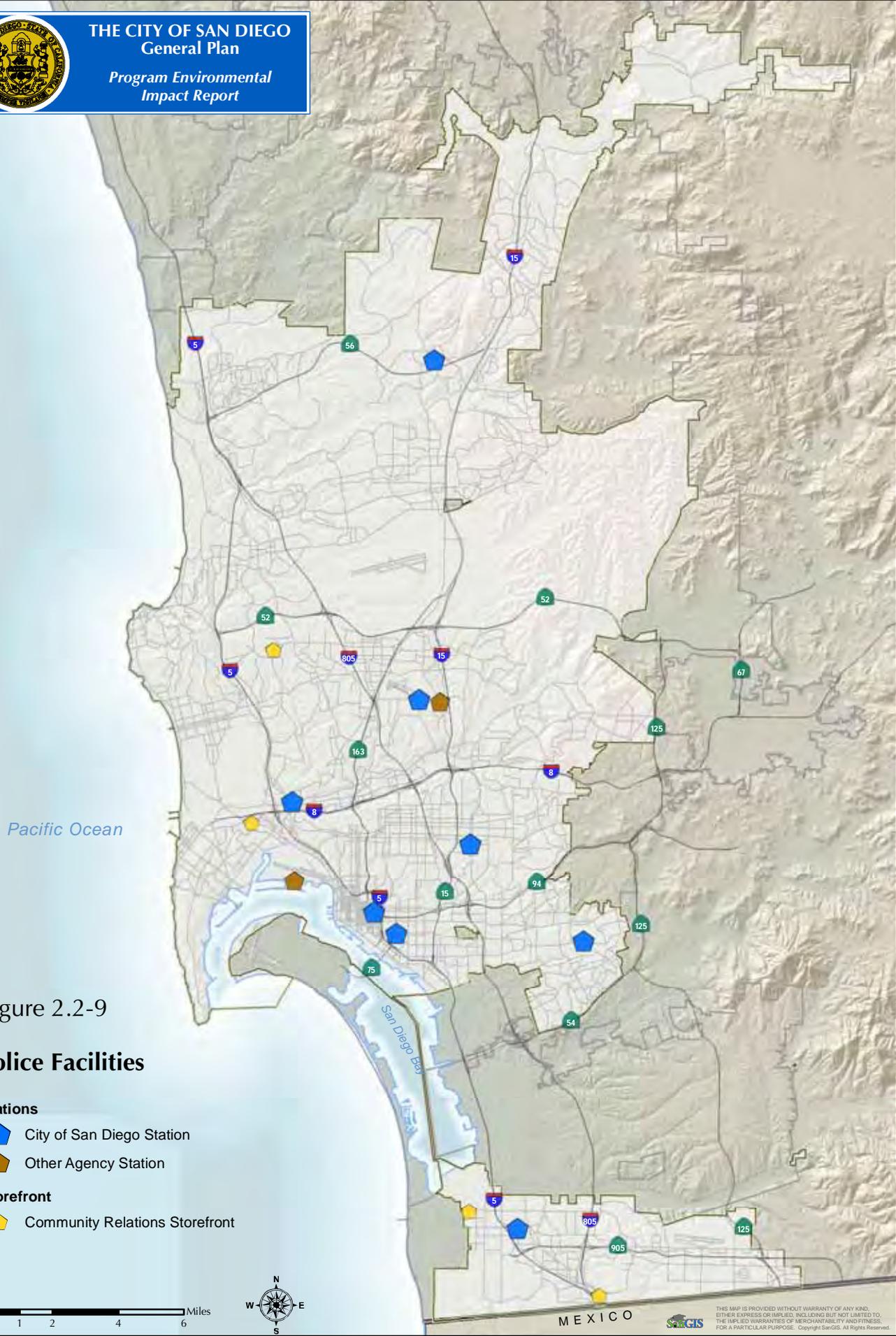


Figure 2.2-9

Police Facilities

Stations

-  City of San Diego Station
-  Other Agency Station

Storefront

-  Community Relations Storefront

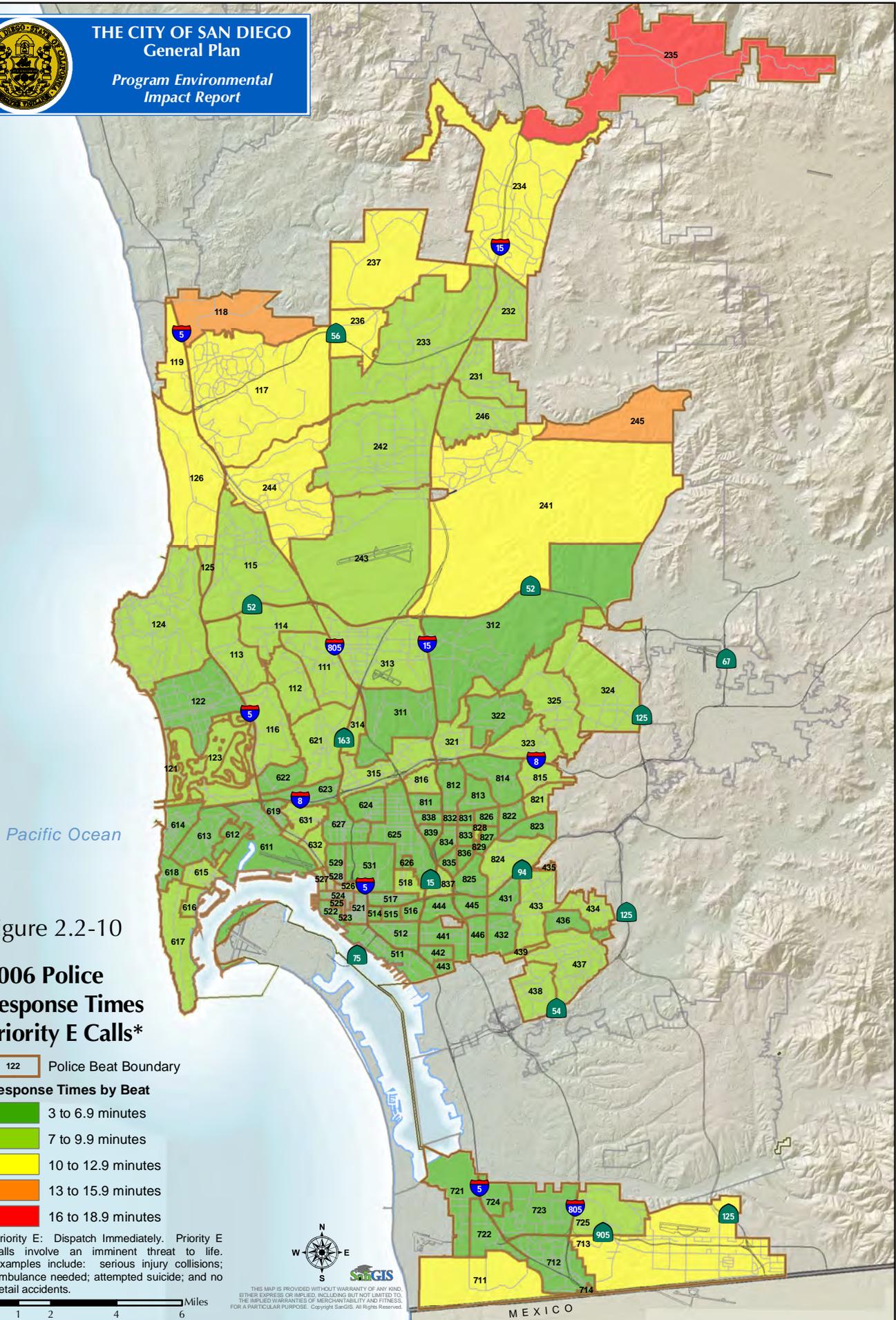


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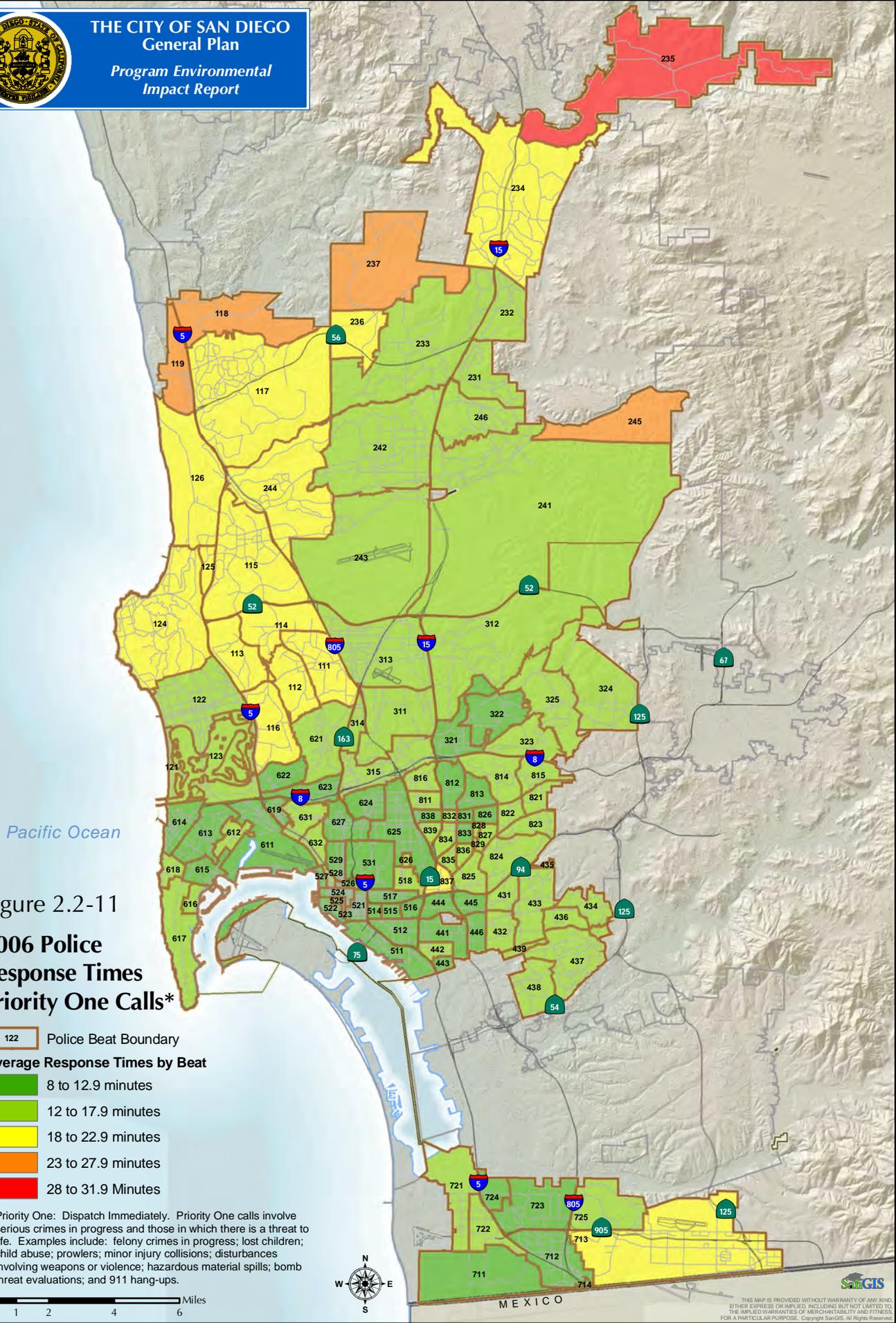


Figure 2.2-11

**2006 Police
Response Times
Priority One Calls***

- 122 Police Beat Boundary
- Average Response Times by Beat**
- 8 to 12.9 minutes
- 12 to 17.9 minutes
- 18 to 22.9 minutes
- 23 to 27.9 minutes
- 28 to 31.9 Minutes

Priority One: Dispatch Immediately. Priority One calls involve serious crimes in progress and those in which there is a threat to life. Examples include: felony crimes in progress; lost children; child abuse; prowlers; minor injury collisions; disturbances involving weapons or violence; hazardous material spills; bomb threat evaluations; and 911 hang-ups.



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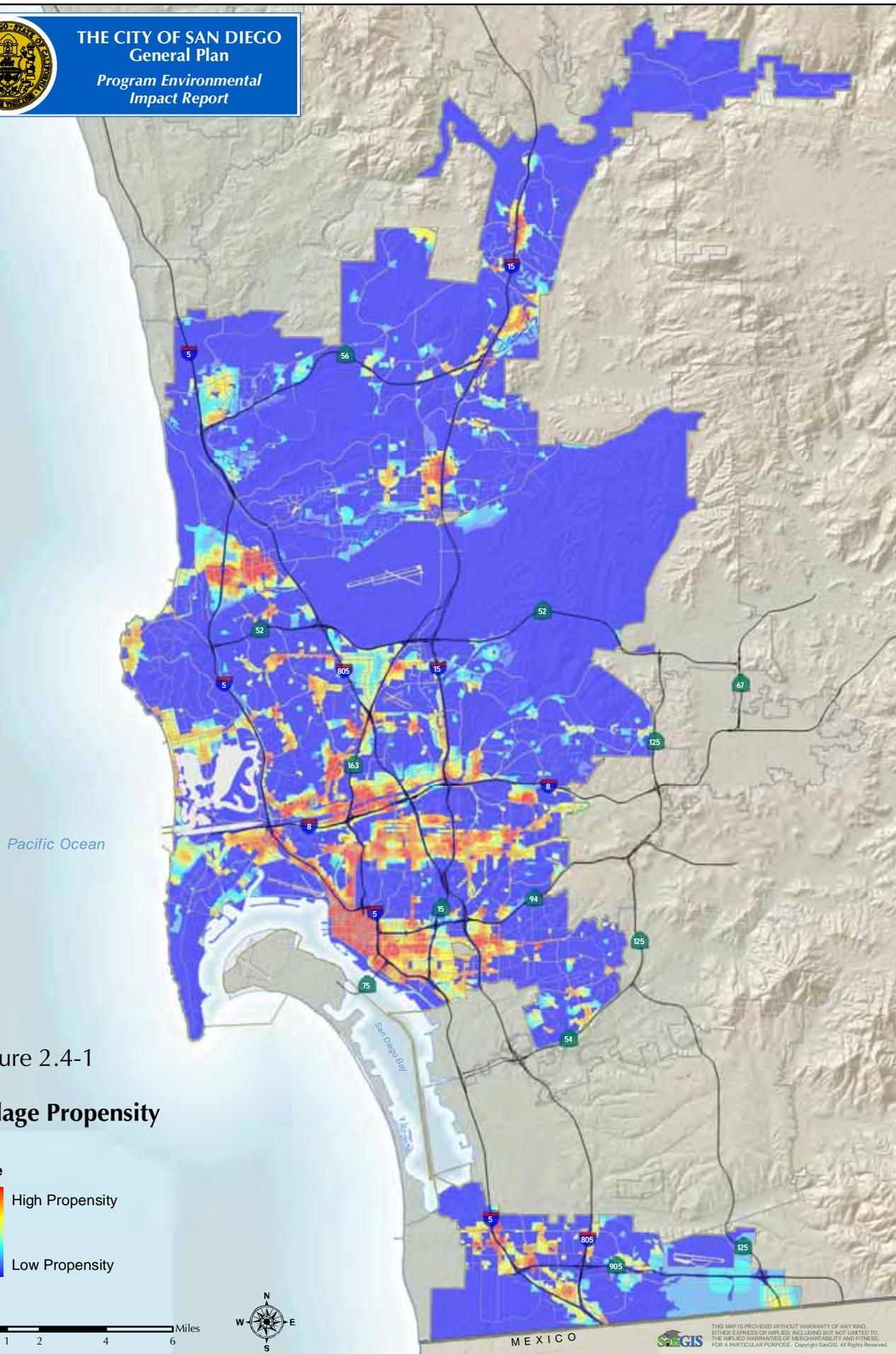
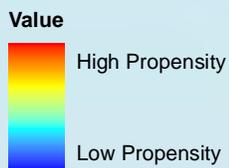


Figure 2.4-1
Village Propensity



3.0 ENVIRONMENTAL ANALYSIS

This section of the EIR discusses each of the potentially significant effects of implementing the City of San Diego Draft General Plan, and identifies mitigation measures to reduce impacts found to be significant in the EIR analysis. This EIR analyzes the environmental issue areas identified in accordance with CEQA Guidelines, Section 15000 et. seq.

Environmental Issue Areas

The environmental issue areas analyzed in this section of the EIR include:

- | | |
|---------------------------|--|
| 1. Agricultural Resources | 10. Noise |
| 2. Air Quality | 11. Paleontological Resources |
| 3. Biological Resources | 12. Population and Housing |
| 4. Geologic Conditions | 13. Public Services and Facilities |
| 5. Health and Safety | 14. Public Utilities |
| 6. Historic Resources | 15. Transportation/Traffic/Circulation/Parking |
| 7. Hydrology | 16. Visual Effects and Neighborhood Character |
| 8. Land Use | 17. Water Quality |
| 9. Mineral Resources | |

Each environmental issue listed above is analyzed in the following manner:

- **Existing Conditions** describes the environmental setting in the vicinity of the project before the commencement of the project to provide a baseline for comparing “before the project” and “after the project” environmental conditions in accordance with Section 15125 of the CEQA Guidelines.
- **Thresholds of Significance** defines and lists specific criteria used to determine whether an impact is or is not considered to be significant. Major sources used in crafting criteria appropriate to the specifics of the project include: the CEQA Guidelines; City of San Diego, state, federal or other standards applicable to an impact category; and officially established thresholds of significance. “. . . an ironclad definition of significant is not possible because the significance of an activity may vary with the setting.” (CEQA Guidelines, Section 15064[b]). Principally, a substantial, or potentially substantial, adverse change in any of the physical conditions within an area affected by the project, including land, air, water, flora, fauna, ambient noise, and objects of historic and aesthetic significance” constitutes a significant impact (CEQA Guidelines, Section 15382).
- **Impact Analysis** presents evidence, based to the maximum extent possible on scientific and factual data, for the cause and effect relationship between the proposed project and the potential changes in the environment. The exact magnitude, duration, extent, frequency, range, or other parameters of a potential impact are ascertained, to the extent possible, to determine whether impacts may be significant. All of the potential effects,

including direct effects, reasonably foreseeable indirect effects, and considerable contribution to cumulative effects, are considered.

- **Mitigation Framework** identifies the means by which potentially significant impacts could be reduced or avoided in cases where the EIR analysis determined such impacts to be potentially significant. Standard existing regulations, requirements, programs, and procedures that are applied to all similar projects are taken into account in identifying additional project specific mitigation that may be needed to reduce significant impacts. Mitigation, in addition to measures that the lead agency will implement, can also include measures that are within the responsibility and jurisdiction of another public agency (CEQA Guidelines, Section 15091 [a] [2]).
- **Significance of Impact with Mitigation Framework** identifies the impacts that may remain after application of mitigation measures, and whether the remaining impacts are or are not considered significant. When these impacts, even with the inclusion of mitigation measures, cannot be mitigated to a level considered less than significant, they are identified as “significant unavoidable impacts.” To approve a project with significant unavoidable impacts, the lead agency must adopt a Statement of Overriding Consideration. In adopting such a statement, the lead agency finds that it has reviewed the EIR, has balanced the benefits of the project that outweigh the unavoidable adverse environmental effects, thus, the adverse environmental effects may be considered “acceptable” (CEQA Guidelines, Section 15093 [a]).

Approach to Environmental Analysis

The environmental analysis in this EIR addresses potential impacts associated with implementation of the Draft General Plan at both the planning horizon year (2030) and buildout. The 2030 planning horizon represents an approximate 20- to 25-year period in which land use planning decisions are expected to have foreseeable implications. Beyond that point, gauging the effects of planning under dynamic conditions is extremely difficult.

“Buildout,” for purposes of this Program EIR, generally refers to the theoretical maximum buildout of all land addressed in the Draft General Plan as described on **Tables 3.0-1 and 3.0-2**. The theoretical build-out scenario is included to provide the reader with the ability to understand the worst-case scenario of full, but theoretical development of the General Plan.¹ Unlike a forecast, a theoretical buildout scenario does not have a time horizon, such as 2030, nor does it include transportation, demographic, economic assumptions typically used by a forecasted model to provide a more realistic land use planning data. Therefore, due to regulatory constraints, physical constraints, and foreseeable market conditions, realization of this scenario is highly unlikely; but, this scenario is analyzed because the General Plan land use categories do provide a theoretical capacity. As shown on **Table 3.0-1**, the total number of housing units at buildout would be 754,400, approximately 144,351 or 24 percent more units than projected for the year 2030. As shown on **Table 3.0-2**, the total building floor area of non-residential development as buildout would be 1,097,680,700 square feet, approximately 821,978,400 or 298 percent more

¹ This section was also provided in order to be responsive to case law as a 2003 court decision regarding the El Dorado County General Plan required that El Dorado County address theoretical build out.

square feet than projected for the year 2030. The methodologies for calculating buildout of housing units and non-residential building square footage are described in the notes below each table.

Although highly unlikely, the buildout scenario demonstrates residential and non-residential development levels that could theoretically be achieved under the General Plan. However, due to regulatory constraints, physical constraints, and foreseeable market conditions, realization of this scenario is highly unlikely; but this scenario is analyzed because the General Plan land use categories do provide the theoretical capacity (residential units and non-residential building square feet) to allow the buildout statistics presented on **Tables 3.0-1 and 3.0-2**.

The analysis of impacts under the 2030 planning horizon is more detailed than the buildout analysis because of the uncertainties associated with projecting buildout conditions. For 2030, the analysis is quantitative where appropriate and possible. For buildout, the analysis is qualitative except in certain circumstances that are noted for specific topical areas. The analysis of the theoretical buildout scenario is provided in Section 3.18 of this document.

3.1 AGRICULTURAL RESOURCES

3.1.1 Existing Conditions

Agriculture has been an important factor in San Diego's history and local economy. San Diego's unique location and combination of climate, soil types, and international border location have created an agricultural industry which produces off-season and specialty crops, including avocados, citrus, tomatoes, flowers and nursery stock. The United States Department of Agriculture Natural Resource Conservation Service (NRCS) prepared a Soil Survey for the County of San Diego (June 1975) which interpreted the properties of the area's soils for suitability for general intensive agriculture. The Storie Index is a numerical expression ranging from zero to 100 of the general agricultural suitability. Factors that affect the Storie Index are: soil profile characteristics; the texture of the surface soil; slope; and specific limitations for use of the soil such as poor drainage, salts, or high water table. Soils in the region with higher Storie Indices include: Grangeville fine sandy loam; Greenfield sandy loam; Indio silt loam; Reiff fine sandy loam; and Visalia sandy loam.

Farmlands are classified according to soil factors including available water holding capacity, temperature regime, acidity, depth to the water table, electrical conductivity, flooding potential, erosion hazard, permeability, rock content and rooting depth. There are several classifications of farmland including Prime Farmland, Farmland of Statewide Importance, Farmland of Local Importance, and Unique Farmland.

Prime Farmland is land with the best combination of physical and chemical features for the production of agricultural crops. It includes land with Class I and Class II Land Use Capability classifications by the NRCS, land which qualifies for a rating of 80 to 100 on the Storie Index, land which supports livestock identified by NRCS, and land meeting certain planting and economic thresholds. Farmland of Statewide Importance is land with a good combination of physical and chemical features for the production of agricultural crops. Unique Farmland is land of lesser quality soils used for production of the state's leading agricultural cash crops. Farmland of Local Importance is land that a local unit has designated as having local significance; a local designation will take priority over some other classification by the state.

There is a wide variety of agricultural soil in San Diego. Soils in the City vary appreciably in origin, degree of weathering, depth and texture. The NRCS (formerly Soil Conservation Service) has classified lands according to their productive capability, taking into account specific qualities of the soil slope of the land, degree of wetness, flooding hazards and other factors. There are still many locations in San Diego which have the productive soil and the other requisites to be especially well suited for agricultural purposes. In San Diego, the best remaining agricultural soils are found in broad river valleys. The City has developed programs to keep these valleys predominately agricultural through lease agreements, such as in San Pasqual Valley where agriculture comprises approximately 30 percent of the land use.

Within the City there are about 15,900 acres of land designated for agricultural uses. Areas of continuing significant agricultural production in the City are located in the San Pasqual Valley, on

Otay Mesa, and in the Tijuana River Valley. Agricultural land categories are shown on **Figure 3.1-1**. The major areas of Prime Farmland are in the Tijuana River Valley west of Interstate 5 (I-5); and in northern San Pasqual Valley, along the San Dieguito River. In the north City area between I-5 and Interstate-15 (I-15), in the San Pasqual Valley area and on Otay Mesa, there are lands designated as Farmland of Statewide Importance and Unique Farmland. Significant acreages of locally Important Farmland are located in the north City area, Los Peñasquitos Canyon, the San Pasqual Valley, and on Otay Mesa.

The California Land Conservation Act of 1965, also known as the Williamson Act, was enacted for the purpose of allowing cities and counties to preserve agricultural land via voluntary contracts with the landowners so they could receive the benefit of having the land taxed at a rate consistent with its actual use, instead of the potential market value. A majority of the agricultural land in San Diego is owned by the City of San Diego, and the Williamson Act does not apply to land owned by the City of San Diego. There are no Williamson Act lands within the City of San Diego.

The approximately 14,000-acre San Pasqual Valley plan area, largely owned by the City of San Diego Water Department, lies within the San Dieguito River Basin and contains the Hodges Reservoir and significant groundwater resources. The City of San Diego acquired the valley in the late 1950s for water supply purposes. The valley also serves as a valuable agricultural, biological, scenic, and recreational resource. The San Pasqual Valley Plan (1995) calls for optimization of water supply and quality, preservation of rural character, retention of agriculture, habitat preservation, and creation of an open space park among other goals. The City of San Diego has reaffirmed its commitment to protection and wise management of the San Pasqual Valley through development of the San Pasqual Vision Plan together with a series of ten directives which identify detailed plan implementation actions.

The Division of Land Resource Protection Farmland Mapping and Monitoring Program (FMMP) produces *Important Farmland Maps*, which are a hybrid of resource quality (soils) and land use information maps, and statistical data, principally the biennial *California Farmland Conversion Report*, that are used for analyzing impacts on California's agricultural resources. The maps are updated every two years with the use of aerial photographs, a computer mapping system, public review, and field reconnaissance. The goal of the program is to provide consistent and impartial data to decision makers for use in assessing present status, reviewing trends, and planning for the future of California's agricultural land resources.

3.1.2 Thresholds of Significance

A significant impact could occur if implementation of the General Plan:

- Results in the conversion of agricultural lands to nonagricultural use or impairs the agricultural productivity of agricultural lands; or
- Conflicts with existing zoning for agricultural use, or Williamson Act contract.

3.1.3 Impact Analysis

Could implementation of the Draft General Plan result in the conversion of agricultural lands to nonagricultural use or impair the agricultural productivity of agricultural lands?

Impacts to agricultural resources occur when Prime Farmland, Unique Farmland, or Farmland of Statewide Importance is converted to non-agricultural use. Direct conversion of large tracts of important agricultural lands to urban uses such as residential subdivisions, transportation facilities, or developed parks and other public uses would eliminate the agricultural productivity of these lands forever due to grading and soil loss. Development of relatively small areas within or immediately adjacent to farmland also may result in loss of agricultural productivity by curtailing or limiting agricultural activities related to raising crops such as spraying of pesticides.

The City owns a large agricultural preserve (approximately 14,000 acres) in the San Pasqual Valley, which is now part of the San Dieguito River Park. This area is expected to remain in long-term agricultural use through continuation of lease agreements, as called for in the San Pasqual Valley Plan. Under existing adopted community plans as well as the Draft General Plan, less than two percent of the City's land area is within an agricultural land use designation. The City has existing programs to protect the City's best remaining agricultural soils through lease agreements, such as in the San Pasqual Valley, where agriculture comprises approximately 30 percent of the land use. The Draft General Plan (p. CE-39) calls for continued "retention of productive agricultural lands," "reduction of land use conflicts between agricultural and other land uses," and "retention of the rural agricultural character of the river valleys."

Draft General Plan policies aimed at preserving and promoting safe and sustainable agricultural uses within the City are provided below:

- Manage agricultural activity to minimize soil erosion and minimize the release of contaminants into surface and groundwater resources.
- Limit retail activity in agriculturally-designated areas to uses that are reasonably related to agriculture (e.g., sale of locally grown farm products).
- Encourage agricultural operations (especially on City-leased lands) to provide for educational experiences which demonstrate the history, importance and value of agricultural operations.
- Continue water reclamation research programs to develop realistic methods of providing inexpensive means of leaching soils, irrigating crops and preventing salt water intrusion.
- Encourage sustainable agricultural and water quality best management practices, such as tillage, use of grass filter strips, runoff detention basins, and organic farming, on all private land and require Best Management Practices (BMPs) on new or renewed City land leased for agricultural purposes. Provide the minimum amount of flood control/channelization.
- Provide mechanisms to permit private land owners of prime agricultural lands to take advantage of the Williamson Act.
- Balance the economic benefits provided by agricultural uses with the competing water resource, biological and cultural resource management and recreation priorities.

While the General Plan has specific goals and policies to protect agricultural land, if future discretionary projects result in the conversion of a substantial amount of existing agricultural land to a non-agricultural use or the impairment of the productivity of existing agricultural land

as a result of encroaching urban development, an incremental agricultural resources impact could occur.

It is infeasible at this Program EIR level to provide specific mitigation that would reduce impacts to a less than significant level, since specific development projects are not known. Thus, there is a potential for significant unavoidable impacts related to agricultural resources.

Could implementation of the Draft General Plan conflict with existing zoning for agricultural use, or Williamson Act contract?

Agricultural processing and the raising and harvesting of crops are prohibited in the Open Space--Park (OP) and Open Space--Conservation (OC) zones. Only public parks and recreation facilities would be allowed within the OP zone. The OC zone would be used to implement land use plans in the preservation of the natural character of the land and environmentally sensitive land. In addition, the agricultural processing uses would be prohibited in the (Open Space--Residential (OR) zones.

Agricultural processing, and the raising and harvesting of crops are permitted by right in the OR-1-2 and Open Space--Floodplain (OF) zones. However, all uses in the OR zones, except passive recreation and natural resource preservation, must be located only within the permitted development area. Pursuant to **Section 131.0250**, the allowable development area is, with certain qualifications, up to 25 percent of the premises. Thus, new agricultural uses (raising and harvesting of crops) would be limited to a maximum of 25 percent of a premise. According to the City of San Diego Multiple Species Conservation Program (MSCP) Subarea Plan, existing agricultural operations within the preserve would not be limited or restricted.

The geographic extent of lands that are currently nonagricultural and have the potential to be converted to agricultural uses is limited to the Otay Mesa area and the San Pasqual Valley area. Agricultural uses tend to require fairly extensive land area to be economically feasible. With such limited areas available for expansion of agricultural uses, and the land use trend in San Diego being urbanization, it is not anticipated that there would be a significant amount of conversion to new agriculture uses in the City.

The California Land Conservation Williamson Act of 1965 (Williamson Act) was designed as an incentive to retain prime agricultural land and open space in agricultural use, thereby slowing its conversion to urban and suburban development. The program entails a ten year contract between the City and an owner of land whereby the land is taxed based on the basis of its agricultural use rather than the market value (San Diego County Guidelines for Determining Significance and Report Format and Content Requirements, Library 2007). There currently are no Williamson Act contracts in the City. However, the General Plan policies include providing mechanisms for private land owners of prime agricultural lands to take advantage of the Williamson Act.

Although the Draft General Plan proposes several policies aimed at protecting significant agricultural resources, there is a potential for future land development that is consistent with the General Plan to impact these resources. Determination of loss of agricultural productivity would be addressed through the entitlement process. The analysis would involve the identification of

important farmland and lands that support crops that are considered valuable to the local economy at the project level.

It is infeasible at this Program Environmental Impact Report (Program EIR) level to provide specific mitigation that would reduce impacts to a less than significant level, since specific development projects are not known. Thus, there is a potential for significant unavoidable impacts related to agricultural resources.

3.1.4 Mitigation Framework

Mitigation for impacts to agricultural resources would occur at the project level and may involve preservation of important agricultural lands or buffers between new uses and existing adjacent agricultural uses.

3.1.5 Significance of Impact with Mitigation Framework

Although significant impacts to agricultural resources may be mitigated through review of discretionary projects, mitigation for impacts to agricultural resources is not available at the Program EIR level since specific development projects are not known. Therefore, the impact to agricultural resources is considered significant and unavoidable at this program level of review.



THE CITY OF SAN DIEGO General Plan

Program Environmental Impact Report

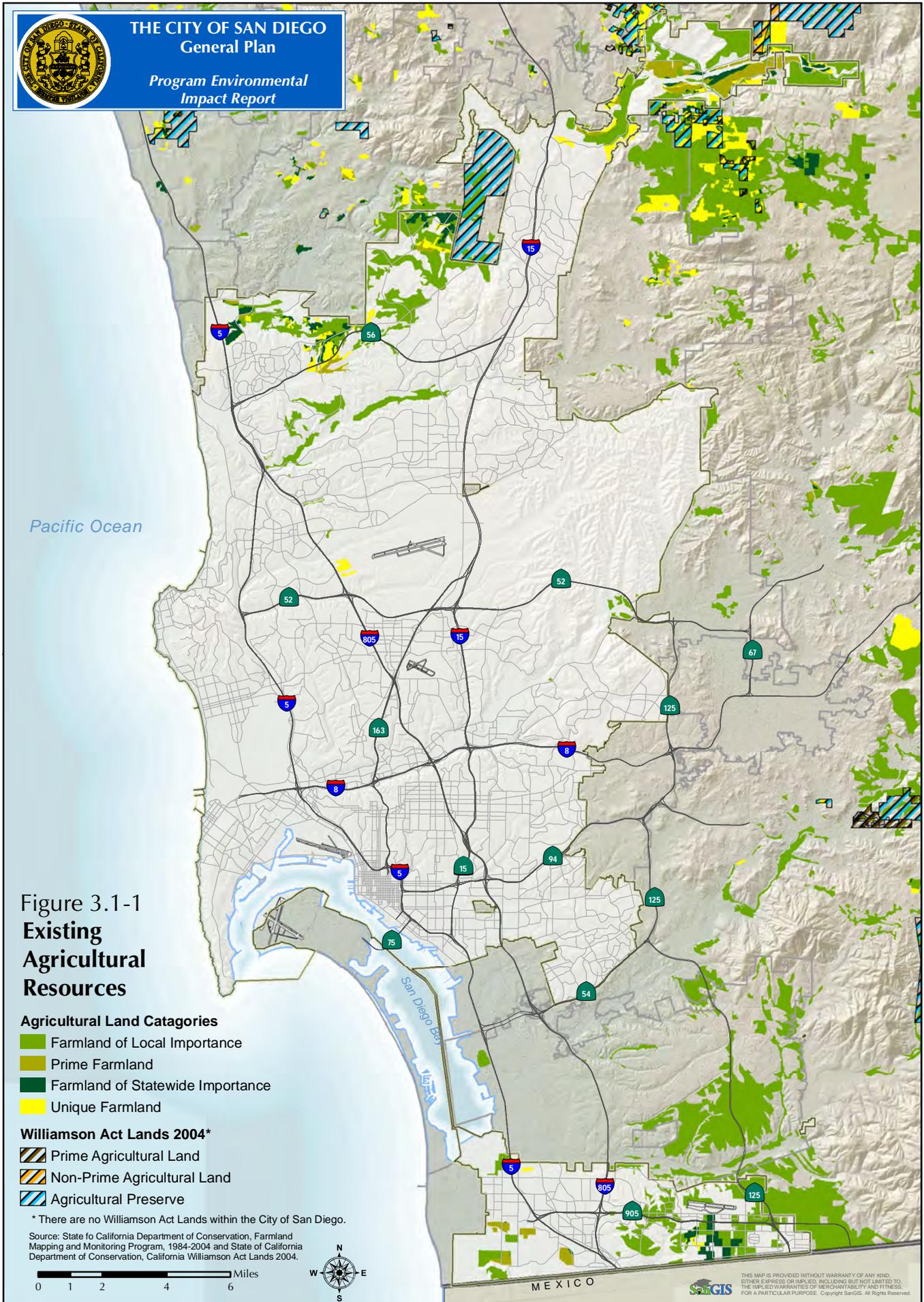


Figure 3.1-1
Existing
Agricultural
Resources

3.2 AIR QUALITY

3.2.1 Existing Conditions

Area Description

The San Diego Air Basin (SDAB) lies in the southwest corner of California and comprises the entire San Diego region. However, population and emissions are concentrated mainly in the western portion of the county. The air basin covers 4,260 square miles, includes about eight percent of the state's population, and produces about seven percent of the state's criteria pollutant emissions. The City of San Diego covers approximately 330 square miles, or eight percent, of the SDAB.

Air quality in the SDAB is impacted not only by local emissions, but also by pollutants transported from other areas, in particular, ozone and ozone precursor emissions transported from the South Coast Air Basin and the Republic of Mexico. Although the impact of transport is particularly important on days with high ozone concentrations, transported pollutants and emissions cannot be blamed entirely for the ozone problem in the San Diego area. Studies show that emissions from the SDAB are sufficient, on their own, to cause ozone violations.

Topography and Climate

The topography in the San Diego region varies greatly, from beaches on the west to mountains and desert on the east. Much of the topography in between consists of mesa tops intersected by canyon areas. The topography in the San Diego region, along with local meteorology, influences the dispersal and movement of pollutants in the basin. The mountains to the east prohibit dispersal of pollutants in that direction and help trap them in inversion layers, which will be discussed in the next section.

The weather of the San Diego region, as in most of southern California, is influenced by the Pacific Ocean and its semi-permanent high-pressure systems that result in dry, warm summers and mild, occasionally wet winters. The average temperature ranges from the mid 40s to the high 90s. Most of the county's precipitation falls from November to April, with infrequent (approximately ten percent) precipitation during the summer. The average seasonal precipitation along the coast is approximately ten inches; the amount increases with elevation as moist air is lifted over the mountains (University of California 1970).

The interaction of ocean, land, and the Pacific High Pressure Zone maintains clear skies for much of the year and drives the prevailing winds. Local terrain is often the dominant factor inland, and winds in inland mountainous areas tend to blow through the valleys during the day and down the hills and valleys at night.

In conjunction with the two characteristic onshore/offshore wind patterns, there are two types of temperature inversions (reversals of the normal decrease of temperature with height) which occur within the region that affect atmospheric dispersive capability and that act to degrade local air

quality. In the summer, an inversion at about 1,100 to 2,500 feet is formed over the entire coastal plain when the warm air mass over land is undercut by a shallow layer of cool marine air flowing offshore. The prevailing sunny days in this region further exacerbate the smog problem by inducing additional adverse photochemical reactions. During the winter, a nightly shallow inversion layer (usually at about 800 feet) forms between the cooled air at the ground and the warmer air above, which can trap vehicular pollutants. The days of highest CO concentrations occur during the winter months.

The predominant onshore/offshore wind pattern is sometimes interrupted by so-called Santa Ana conditions, when high pressure over the Nevada-Utah area overcomes the prevailing westerly winds, sending strong, steady, hot and dry winds from the east over the mountains and out to sea. Strong Santa Ana winds tend to blow pollutants out over the ocean, producing clear days. However, at the onset or breakdown of these conditions or if the Santa Ana is weak, prevailing northwesterly winds reassert themselves and send a cloud of contamination from the Los Angeles Basin ashore in the SDAB.

Regional Air Quality

Growth rates in the SDAB during the last 20 years were among the highest in the state's urban areas. The population increased by 54 percent, from more than 1.9 million in 1982 to over 2.9 million in 2001 (California Air Resources Board [CARB] 2003a). During this same period, the number of Vehicle Miles Traveled (VMT) each day increased over 120 percent from about 34 million miles per day in 1982 to nearly 75 million miles per day in 2001. A 2005 American Communities Survey identified that 74 percent of employed San Diego residents commuted alone in automobiles to work, only slightly higher than the national average of 71 percent. Just over four percent of employed San Diego residents used public transportation to commute, more than double the national average of 2.0 percent.

As in other parts of California, overall air quality in the SDAB has improved, despite high growth rates, in part due to the benefits of cleaner technologies. In 2002, motor vehicles and other mobile sources were determined to emit 76 percent of the harmful pollutants that degrade the air quality of the San Diego region, and industrial sources emitted 14 percent. By 2004, automobiles and other mobile sources were found to emit 53 percent of the pollutants, industrial sources to emit 27 percent of the region's harmful pollutants, and natural sources (e.g., sea salt, wildfires, biogenic organic emissions, and wind erosion of undisturbed soil) to emit 20 percent of the regions harmful pollutants Air Pollution Control District ([APCD] 2004).

Significant progress has been realized in the region's air quality since the early 1970s when San Diego Association of Governments (SANDAG) and the San Diego APCD began working together to reduce regional emissions. SANDAG is governed by a Board of Directors comprised of mayors and officials from each of the region's 19 local governments, including the City of San Diego, as well as advisory representatives from San Diego and Imperial Counties, Mexico, and other local and state agencies. The County Board of Supervisors serves as the Board of Directors for the APCD.

SANDAG is responsible for developing a “Transportation Control Measures (TCM) Plan” to help achieve air quality objectives for the region. The plan provides actions to reduce air pollution such as increasing efficiency of the transportation system, motor vehicles, and encouraging bicycling and other forms of transportation. Through this planning process, the City of San Diego delivers input and assists in the formulation of air quality policies and plans through which it will be guided. The APCD adopts the TCM Plan as part of the Regional Air Quality Strategy (RAQS). The RAQS is updated on a triennial basis and outlines measures for achieving state and national air quality standards.

Control of motor vehicle emissions, a primary contributor to regional air pollution, has been a focus of federal and state air quality legislation. Consequently, legislation now includes requirements that transportation officials make a commitment to programs and projects that will help achieve national air quality goals. Recent attention has also been directed towards measures that reduce emissions from indirect sources of air pollution. The APCD is responsible for stationary source tactics to reduce air pollution resulting from industry.

Specific Air Pollutants

Emissions of oxides of nitrogen (NO_x), Reactive Organic Gases (ROG), particulate matter equal to or less than ten microns (PM₁₀), and carbon monoxide (CO) in the SDAB have been following statewide trends for each pollutant since 1975. These trends are largely due to motor vehicle controls and reductions in evaporative emissions. Mobile sources (both on-road and other) are by far the largest contributors to NO_x, ROG, and CO emissions in the SDAB. The majority of the PM₁₀ emissions are from areawide sources (CARB 2006a). Although the impact of transport is particularly important on days with high ozone concentrations, transported pollutants and emissions cannot be blamed entirely for the ozone problem in the San Diego area. Studies show that emissions from the SDAB are sufficient, on their own, to cause violations for some criteria pollutants.

Improvements from the transportation sector are primarily the result of advances in technology. The elimination of lead in gasoline, lower fuel volatility, and the advancement of emissions control systems have resulted in major reductions in emissions of lead, reactive hydrocarbons, CO, and NO_x. The cleaner-burning gasoline sold in California starting in the spring of 1996 has reduced hydrocarbons by 17 percent and CO by 11 percent relative to 1994 “conventional” gasoline. The enhanced vehicle inspection and maintenance program (Smog Check II) implemented in 1998 provides additional emission reductions.

Progress has been made in the region of attaining federal and state air quality standards. Federal and state standards have been met for lead, nitrogen dioxide (NO₂), sulfur dioxide (SO₂), and CO, and federal standards are being met for inhalable particulates. In addition, SDAB was recently determined to be in attainment for the federal one-hour ozone standards by Environmental Protection Agency (EPA).

Air quality is commonly expressed as the number of days that air pollution levels exceed state standards set by the CARB or federal standards set by the EPA (**Table 3.2-1**). The concentrations of pollutants within the SDAB are measured at the 11 monitoring stations

maintained by the APCD and the CARB. The locations of monitoring stations in the San Diego region are shown on **Figure 3.2-1**. Three of the stations are located within the jurisdictional limits of the City of San Diego: one each in Kearny Mesa, Downtown on Union Street, and Downtown on 12th Avenue.

Air quality at a particular location is a function of the type and amount of pollutants being emitted into the air locally and throughout the basin and of the dispersal rates of pollutants within the region. The major factors affecting pollutant dispersion are wind speed and direction, inversion layers (which affect vertical dispersion), and the local topography.

Carbon Monoxide

Improvements from the transportation sector, primarily resulting from advances in technology such as emissions control systems, have resulted in major reductions in CO emissions in the SDAB, following the statewide trend of declining from 1975 to 2020 (**Table 3.2-2**). After three years of no violations, the SDAB was reclassified as an attainment area for CO in 2004. The EPA approved the CO Maintenance Plan in 1998.

Ozone and Hydrocarbons

Both the peak indicator and the number of days above the state and federal ozone standards have decreased over the last 20 years as shown on **Table 3.2-3**. The peak one-hour ozone indicator shows an overall decline of 40 percent from 1985 to 2004. The number of state and federal one-hour standard exceedance days has dropped even more. There were 148 state standard exceedance days in 1985 and 12 state exceedance days during 2004. This represents a decrease of about 92 percent. During 1985, there were 50 federal one-hour exceedance days. There was one federal one-hour standard exceedance day during 2004. However there were more days that exceeded the federal eight-hour standard. To fully reduce this to zero days, additional local emissions controls are needed to maintain attainment of the ozone standards in the San Diego region. However, because of transport, future air quality in this area would also be affected by emissions controls and growth in the South Coast Air Basin and, to some extent, Mexico.

On-road motor vehicle emissions account for approximately 50 percent of smog (ROG + NO_x) in the San Diego region. The NO_x and ROG emissions have been decreasing overall since 1975 (**Tables 3.2-4 and 3.2-5**). These decreases are mostly due to decreased emissions from motor vehicles, brought about by stricter motor vehicle emission standards. These large decreases helped offset stationary and area-wide source emissions of ROG which have increased slightly over the last 20 years, though ROG production has been slowed by stricter emissions standards offsetting industrial and population growth (**Table 3.2-5**).

The region exceeded the federal standard for one-hour ozone on two days in 2001, and one day in 2003, compared with 12 days in 1995 and 87 days in 1980. No violations of the federal ozone standard were recorded in the SDAB in 1999, 2000, and 2002. The region exceeded the more stringent state standards on 29 days in 2001, 15 days in 2002, and 23 days in 2003, compared with 96 days in 1995 and 167 days in 1980.

**Table 3.2-1
California and Federal Air Quality Standards**

Air Pollutant	State Standard ⁽¹⁾	Federal Primary Standard ⁽²⁾	Most Relevant Health Effects
	Concentration ⁽³⁾ / Averaging Time	Concentration ^(3, 4) / Averaging Time	
Ozone	0.09 ppm, 1-hr. avg.> 0.07 ppm, 8-hr. avg.>	0.08 ppm, 8-hr. avg.>	(a) Short-term exposures: (1) Pulmonary function decrements and localized lung edema in humans and animals. (2) Risk to public health implied by alterations in pulmonary morphology and host defense in animals; (b) Long-term exposures: Risk to public health implied by altered connective tissue metabolism and altered pulmonary morphology in animals after long-term exposures and pulmonary function decrements in chronically exposed humans; (c) Vegetation damage; (d) Property damage
Carbon Monoxide (CO)	9.0 ppm, 8-hr. avg.> 20 ppm, 1-hr. avg.>	9.0 ppm, 8-hr. avg.> 35 ppm, 1-hr. avg.>	(a) Aggravation of angina pectoris and other aspects of coronary heart disease; (b) Decreased exercise tolerance in persons with peripheral vascular disease and lung disease; (c) Impairment of central nervous system functions; (d) Possible increased risk to fetuses
Nitrogen Dioxide (NO ₂)	0.25 ppm, 1-hr. avg.>	0.053 ppm, ann. avg.>	(a) Potential to aggravate chronic respiratory disease and respiratory symptoms in sensitive groups; (b) Risk to public health implied by pulmonary and extra-pulmonary biochemical and cellular changes and pulmonary structural changes; (c) Contribution to atmospheric discoloration
Sulfur Dioxide (SO ₂)	0.04 ppm, 24-hr. avg.> 0.25 ppm, 1-hr. avg.>	0.03 ppm, ann. avg.> 0.14 ppm, 24-hr. avg.>	(a) Bronchioconstriction accompanied by symptoms which may include wheezing, shortness of breath and chest tightness, during exercise or physical activity in persons with asthma
Suspended Particulate Matter (PM ₁₀)	20 µg/m ³ , ann. geometric mean> 50 µg/m ³ , 24-hr. average>	150 µg/m ³ , 24-hr. avg. >	(a) Excess deaths from short-term exposures and exacerbation of symptoms in sensitive patients with respiratory disease; (b) Excess seasonal declines in pulmonary function, especially in children; (c) Increased risk of premature death from heart or lung diseases in elderly
Suspended Particulate Matter (PM _{2.5})	12 µg/m ³ , ann. arithmetic mean >	15 µg/m ³ , ann. arithmetic mean > 35 µg/m ³ , 24-hr avg.>	

**Table 3.2-1
California and Federal Air Quality Standards**

Air Pollutant	State Standard ⁽¹⁾	Federal Primary Standard ⁽²⁾	Most Relevant Health Effects
	Concentration ⁽³⁾ / Averaging Time	Concentration ^(3, 4) / Averaging Time	
Sulfates	25 µg/m ³ , 24-hr avg.≥	No federal standard	(a) Decrease in ventilatory function; (b) Aggravation of asthmatic symptoms; (c) Aggravation of cardio-pulmonary disease; (d) Vegetation damage; (e) Degradation of visibility; (f) Property damage
Lead ⁵	1.5 µg/m ³ , 30-day avg.≥	1.5 µg/m ³ , calendar quarter>	(a) Increased body burden; (b) Impairment of blood formation and nerve conduction
Hydrogen Sulfide	0.03 ppm 1-hr. avg.>		(a) Irritation to eyes and respiratory tract; (b) Conjunctivitis, pain, lacrimation, and photophobia may persist for several days; (c) Coughing, pain in breathing, pain in nose and throat; (d) Repeated exposure causes headache, dizziness, and digestive disturbances; (e) Collapse and death. ⁶
Vinyl Chloride	0.01 ppm 24-hr. avg.>		(a) Irritation to eyes and respiratory tract; (b) Acute exposure causes dizziness, drowsiness, headaches, and giddiness; (c) Acute exposure to extremely high levels of vinyl chloride has caused loss of consciousness, lung and kidney irritation, and inhibition of blood clotting in humans and cardiac arrhythmias in animals. ⁷

1 California standards for ozone, CO (except Lake Tahoe), SO₂ (1- and 24-hour), NO₂, suspended particulate matter – PM₁₀, PM_{2.5}, and visibility reducing particles, are values that are not to be exceeded. All others are not to be equaled or exceeded. California ambient air quality standards are listed in the Table of Standards in Section 70200 of Title 17 of the California Code of Regulations. For readers' convenience in picking out standards quickly, concentration appears first; e.g. "0.12 ppm, 1-hr. avg.>" means 1-hr. avg> 0.12 ppm

2 National standards (other than ozone, particulate matter, and those based on annual averages or annual arithmetic mean) are not to be exceeded more than once a year. The ozone standard is attained when the fourth highest eight-hour concentration in a year, averaged over 3 years, is equal to or less than the standard. For PM₁₀, the 24-hour standard is attained when the expected number of days per calendar year with a 24-hour average concentration above 150 micrograms per cubic meter (µg/m³) is equal to or less than one. For PM_{2.5}, the 24-hour standard is attained when 98% of the daily concentrations, averaged over 3 years, are equal to or less than the standard. Contact U.S. EPA for further clarification and current federal policies.

3 Concentration expressed first in units in which it was promulgated. Equivalent units given in parentheses are based upon a reference temperature of 25°C and a reference pressure of 760 torr. Most measurements of air quality are to be corrected to a reference temperature of 25°C and a reference pressure of 760 torr; ppm in this table refers to parts per million by volume, or micromoles of pollutant per mole of gas.

4 National Primary Standards. The levels of air quality necessary, with an adequate margin of safety to protect the public health.

5 The ARB has identified lead and vinyl chloride as 'toxic air contaminants' with no threshold level of exposure for adverse health effects determined. These actions allow for the implementation of control measures at levels below the ambient concentrations specified for these pollutants.

6 Source: US Army Corps of Engineers <http://el.erdc.usace.army.mil/workshops/04jun-wots/kaluschue.pdf>

7 Source: EPA <http://www.epa.gov/ttn/atw/hlthef/vinylchl.html> Sources: CARB 2006b, South Coast Air Quality Management District, Air Quality Management Plan, 2003.

Emission Source	1975	1985	1995	2000	2005	2010	2015	2020*
All Sources	3299	2924	1719	1279	938	742	610	539
Stationary Sources	30	28	26	40	25	31	31	33
Areawide Sources	23	27	27	28	28	28	29	30
On-Road Mobile	3059	2586	1360	930	626	438	306	225
Gasoline Vehicles	3056	2575	1347	918	616	429	298	217
Diesel Vehicles	3	11	13	11	11	9	8	8
Other Mobile	187	282	306	282	258	244	244	252

CO	1985	1990	1995	2000	2004
Peak 8-hr Indicator (ppm)	10.6	10.2	7.3	5.3	4.6
Days above State 8-hr Standard**	5	1	0	0	0

* The CARB has projected emissions to 2020. Continuing declines in CO emissions from vehicles is expected; specific projections to year 2030 will be available by summer of 2007. The URBEMIS program projects 2030 levels of CO from all sources would be down approximately 40 percent from 2020 values.

** Number of days State standard was exceeded in calendar year.

ppm=parts per million parts of air, by volume

Source: CARB 2006a

Ozone	1985	1990	1995	2000	2004
Peak 1-hour Indicator (ppm)	0.188	0.180	0.148	0.132	0.112
Days above State Standard	148	139	96	24	12
Days above National Standard	50	39	12	0	1

Source: CARB 2006a

The federal one-hour ozone standard is attained when each monitoring site in the region has no more than three days in a three-year period within a maximum hourly average concentration exceeding the standard. The standard has now been attained and the SDAB has recently been redesignated as an attainment area by EPA. San Diego still has not met the more restrictive state one-hour ozone standard, or the federal eight-hour ozone standard.

**Table 3.2-4
NO_x Emissions Trends for SDAB (tons/day, annual average)**

Emission Source	1975	1985	1995	2000	2005	2010	2015	2020*
All Sources	280	287	270	231	189	157	131	125
Stationary Sources	48	17	16	14	9	11	11	12
Area-wide Sources	2	3	3	3	3	3	3	3
On-Road Mobile	178	195	185	149	113	83	57	41
Gasoline Vehicles	168	156	133	96	62	43	30	22
Diesel Vehicles	10	39	52	52	51	40	27	20
Other Mobile	52	72	66	66	65	61	60	69

* The CARB has projected emissions to 2020. Continuing declines in NO_x emissions from vehicles is expected; specific projections to year 2030 will be available by summer of 2007. The URBEMIS program projects 2030 levels of NO_x from all sources would be down approximately 40% from 2020 values.
Source: CARB 2006a

**Table 3.2-5
ROG Emission Trends for SDAB (tons/day, annual average)**

Emission Source	1975	1985	1995	2000	2005	2010	2015	2020*
All Sources	439	413	267	226	186	173	168	170
Stationary Sources	40	54	45	50	55	63	70	76
Area-wide Sources	34	44	41	41	38	40	42	44
On-Road Mobile	334	272	132	89	60	43	32	25
Gasoline Vehicles	334	269	129	86	58	41	30	24
Diesel Vehicles	1	3	3	2	2	2	2	1
Other Mobile	31	44	49	46	33	27	25	24

* The CARB has projected emissions to 2020. Continuing declines in ROG emissions from vehicles is expected; specific projections to year 2030 will be available by summer of 2007. The URBEMIS (urban emissions) software program projects 2030 levels of ROG from all sources would be down approximately 20% from 2020 values.
Source: CARB 2006a

In 2005, the EPA replaced the one-hour federal ozone standard with a more protective eight-hour standard to address the adverse health effects of prolonged exposure. Although the eight-hour standard was not established until 1997, past monitoring data showed that in 1990 the region would have exceeded the standard nearly 100 days, whereas in 2003, the standard was exceeded six days. An air quality plan is due to the EPA in 2007 demonstrating how the eight-hour standard will be attained throughout the region in 2009. (San Diego Air Pollution Control District [SDAPCD], 2004b).

Particulates

This standard measures particulates (PM₁₀) in the respirable range (ten microns in diameter or less) and is reported as a 24-hour average and as an annual measure. Direct emissions of PM₁₀ increased approximately 65 percent in the SDAB between 1975 and 2005 (as shown on **Table 3.2-6**). This increase is due to growth in emissions from area-wide sources, primarily fugitive dust from vehicle travel on unpaved and paved roads, dust from construction and demolition operations, and particulates from residential fuel combustion (including wood). The growth in these area-wide sources is primarily due to population growth and increases in VMT.

Particulates are measured at the Chula Vista, El Cajon, Kearny Mesa, Escondido, Downtown San Diego, and Otay Mesa monitoring stations. The basin overall is currently in attainment of the federal standards but has not met the more stringent state standard.

Emission Source	1975	1985	1995	2000	2005	2010	2015	2020*
All Sources	68	84	97	105	112	119	125	133
Stationary Sources	17	5	8	7	8	10	10	11
Area-wide Sources	43	68	79	87	94	99	104	110
On-Road Mobile	3	4	4	4	5	5	5	5
Gasoline Vehicles	2	2	3	3	3	4	4	4
Diesel Vehicles	1	2	2	1	1	1	1	1
Other Mobile	6	7	6	6	7	6	7	7

* The CARB has projected emissions to 2020. Specific projections to year 2030 will be available by summer of 2007.

PM₁₀	1988	1990	1995	2000	2004
Peak 1-hour Indicator (ppm)	80	115	121	136	138
Days above State Standard	105	60	117	144	186
Days above National Standard	0	0	0	0	0

Source: CARB 2006a

Another standard to measure PM_{2.5} concentrations (2.5 microns in diameter or less) has been in use since 1999. Annual average PM_{2.5} concentrations in the SDAB have declined slightly since then. Several more years are needed before determining long-term trends. Like PM₁₀, the SDAB is currently designated for PM_{2.5} as in attainment for federal standards, and in non-attainment for state standards.

Nitrogen Dioxide and Sulfur Dioxide

NO_x (including NO₂) emissions in the SDAB follow the statewide trend of declining from 1985 to 2020 (**Table 3.2-4**). In the past, the SDAB had a NO₂ problem. Maximum one-hour concentrations during the 1980s occasionally exceeded the ambient air quality standards. However, ambient concentrations are now well below the levels of both the state and national

standards. Data shows that the maximum peak one-hour indicator decreased 38 percent from 1985 to 2004, and the SDAB is in attainment for the NO₂ standards.

Because NO_x emissions contribute to NO₂, many of the NO_x control measures help reduce ambient NO₂ concentrations. Furthermore, NO_x emission controls are a critical part of the ozone control strategy and are not expected to be relaxed in the future.

The SDAB has been in attainment for sulfur dioxide (SO₂) for several years. The low level of SO₂ in the basin could be attributed to use of low-sulfur fuels in the region's electrical generators, a primary source of this pollutant in other areas of the country.

Lead

The SDAB is presently in attainment for lead. San Diego no longer monitors for lead because the use of unleaded gasoline has lowered lead levels to well below air quality standards.

Regional Air Quality Summary

In summary, based on data from the regional air quality monitoring network, the CARB has classified the air basin as a non-attainment area with respect to the state standards for ozone, PM₁₀, and PM_{2.5}.

Atmospheric Greenhouse Gases

Please see **Section 5.2** of this program EIR for a detailed discussion and analysis of atmospheric greenhouse gases.

Regulatory Framework

Federal Regulations

The federal Clean Air Act (CAA) of 1970, amended in 1977 and 1990 (42 U.S.C. 7506(c)), was enacted for the purpose of protecting and enhancing the quality of the nation's air resources to benefit public health, welfare, and productivity. In 1971, to achieve the purposes of Section 109 of the act, the EPA promulgated National Ambient Air Quality Standards (NAAQS). The NAAQS require that certain pollutants should not exceed specified levels; areas that exceed the standard for specified pollutants are designated as "non-attainment areas." Five pollutants of primary concern were designated: O₃, CO, SO₂, lead, and PM₁₀. In promoting the NAAQS, the EPA allowed states the option to develop different (stricter) standards. Both sets of standards must be met in California.

If an air basin is not in attainment with federal standards for a particular pollutant, the basin is classified as non-attainment. The Federal CAA Amendments of 1990 (CAA) require each state containing non-attainment areas to submit a State Implementation Plan (SIP) to the federal EPA. The SIP specifies measures to be taken to attain the NAAQS by a specified attainment deadline. California's 1994 Ozone SIP was approved by the EPA in February 1997. In a series of rulemakings published from August to October 2002, the EPA published a final determination that the SDAB has attained the one-hour ozone federal standard (EPA 2002). Prior to

determination, San Diego had been designated as a “serious” non-attainment area. The SDAB remains in non-attainment for the eight-hour ozone standard, is designated as a maintenance area for CO. It is in federal attainment for all other criteria pollutants

The CAA, the Intermodal Surface Transportation Efficiency Act of 1991, and the subsequent Transportation Equity Act -21 of 1998 signaled the intent of Congress to promote major reforms in the transportation planning process. The conformity provisions of the CAA require that transportation officials make a commitment to programs and projects that help achieve national air quality goals. Among the goals are providing for greater integration of the transportation and air quality planning processes; ensuring that transportation plans, programs, and projects conform to the “purpose” of the SIP for the attainment of the NAAQS; and reducing the growth in VMT and congestion in areas that have not attained the NAAQS. To conform to the San Diego portion of the SIP, the RTP considered the most recent estimates of mobile source emissions and contributed to emissions reductions for areas designated non-attainment for ozone or CO. In addition, transportation projects must come from a conforming transportation plan and program.

“Conformity” is a determination that transportation plans and programs in non-attainment areas meet the purpose of the SIP. The Metropolitan Planning Organization (in the San Diego region, SANDAG) and the United States Department of Transportation (USDOT) make this determination. Conformity determinations for transportation plans, programs, and projects are based on the USDOT/EPA conformity rule issued in November 1993 and subsequent amendments.

The EPA revised the NAAQS in 1997 to set new eight-hour ozone and particulate matter standards, including a new standard for fine particulate matter (PM_{2.5}—particulate 2.5 micrograms or smaller). After several lower court actions, the U.S. Supreme Court in 2001 upheld EPA’s authority to establish the standard for PM_{2.5} but ordered EPA to develop a new implementation policy. In 2004, the EPA began designating areas as either attainment or non-attainment for the eight-hour ozone standard and classifying the areas according to how badly polluted they are. The SDAB is designated non-attainment for the eight-hour ozone standard.

State Legislation

The 1982 SIP anticipated attaining federal ozone and CO standards by 1987. However, these standards were not attained at that time. A lack of congressional action to reauthorize the federal CAA served as the impetus for the California Legislature to address the state’s continuing effort to improve air quality. In 1988, the California Clean Air Act (CCAA) was enacted requiring that the APCD prepare a revised RAQS for achieving the state and national air quality standards.

The state of California has set more stringent limits than the federal standards on the six pollutants of national concern. These standards are shown on **Table 3.2-1**. California has established ambient standards for sulfates, hydrogen sulfide, vinyl chloride, and visibility reducing particles.

Furthermore, the following RAQS and TCM Plan objectives are required by state law for the San Diego region:

- Reasonably available TCM sufficient to substantially reduce the rates on increase in passenger vehicle trips and miles traveled per trip;

- Measures to achieve the use of significant number of low-emission motor vehicles by operators of motor vehicle fleets (e.g., CARB’s Low Emission Vehicle program); and
- Provisions to develop indirect source control programs.

California Clean Air Act. Amendments to the CCAA became effective on January 1, 1989. The act requires that APCDs implement regulations to reduce emissions from mobile sources through adoption and enforcement of TCM. The CCAA also requires that air districts not meeting state air quality standards prepare local air plans to demonstrate strategies for attainment of those standards.

Requirements for “serious” areas also include implementing a permit program to achieve no-net-increase in emissions of non-attainment pollutants from all permitted new and modified stationary sources, and a requirement for best available retrofit control technology for existing stationary sources. Some of the measures required by the CCAA would reduce energy consumption as well as pollutant emissions.

State Implementation Plan (SIP). The SIP sets forth the state’s strategies for achieving air quality standards. The San Diego APCD is responsible for preparing and implementing the RAQS (that portion of the SIP applicable to the SDAB). In San Diego, the Air Pollution Control Board, which governs the APCD, is comprised of the San Diego County Board of Supervisors. The San Diego APCD adopts rules, regulations, and programs to attain state and federal air quality standards and appropriates funds (including permit fees) to achieve these objectives.

To ensure that the SIP does not become outdated, the CCAA requires annual updates reporting on the implementation schedule of the control measures. Every three years, the overall effectiveness of the RAQS must be addressed and submitted to the CARB in a report adopted at a public hearing (APCD 1992).

The specific actions included in the TCMs in the 1982 SIP have been fully implemented and continue to be funded. These tactics can be grouped into the following three major categories, as indicated below:

Transportation Capacity Expansion Tactics	<ul style="list-style-type: none"> • The <i>Transit Improvement and Expansion Program</i> includes converting the current bus fleet to low emission vehicles, and 29 percent increase in bus service, and a 130 percent increase in rail service (from 1990 levels) to be accomplished by the year 2000. • The <i>Vanpool Program</i> includes the addition of 80 new vanpools, at a rate of 10 vanpools per year, by the year 2000. • The <i>High Occupancy Vehicle Lanes Tactic</i> includes the provision of HOV bypass lanes at metered ramps and implementation of additional HOV lanes as state and federal funding becomes available. • The <i>Park-and-Ride Facilities Tactic</i> includes strategies to encourage utilization of the existing park-and-ride facilities, as well as the development of 4,800 additional spaces, if state and federal funds are available. • The <i>Bicycle Facilities Tactic</i> includes the construction of 25 miles of bikeways per year and other actions to promote bicycle usage.
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Transportation System Management Tactics	The <i>Traffic Flow Improvements Tactic</i> includes the coordination and optimization of traffic signals and computerized signal control to increase traffic flow and reduce emissions caused by motor vehicle stops and starts.
Indirect Source Control Tactics	The <i>Indirect Source Program</i> identifies land use and transportation actions and principles to deal with vehicle-related air pollution.

Sensitive Receptors

The San Diego APCD identifies sensitive receptors as populations that are more susceptible to the effects of air pollution than the general population. Sensitive receptors located in or near the vicinity of known air emission sources, including freeways and congested intersections, are of particular concern. Sensitive receptors are located throughout the Project Area and include but are not limited to the following: hospitals, libraries, child care centers, adult assisted care facilities, and schools. Land use compatibility issues relative to siting of pollution-emitting uses or siting of sensitive receptors must be considered.

3.2.2 Thresholds of Significance

A significant impact could occur if implementation of the Draft General Plan:

- Results in an increased number of automobile, train, or airplane trips or stationary source emissions which could potentially affect San Diego's ability to meet regional, state and federal clean air standards, including the RAQS or SIP; or,
- Results in air emissions that could substantially deteriorate ambient air quality, including the exposure of sensitive receptors to substantial pollutant concentrations.

3.2.3 Impact Analysis

Could implementation of the Draft General Plan result in an increased number of automobile trips or stationary source emissions which could potentially affect San Diego's ability to meet regional, state and federal clean air standards, including the (RAQS) or SIP?

The Draft General Plan calls for most future growth to be focused into mixed-use activity centers. Implementation of the Plan would result in infill, redevelopment and new development occurring in selected areas, which would be identified through the community plan update/amendment process. The effects of the Draft General Plan will be predominantly associated with the potential future changes in land use, and housing that may occur through these future projects, and have the potential to result in a physical impact. Transportation improvements are addressed in the recently adopted Environmental Impact Report (EIR) prepared for the Regional Transportation Plan (RTP) MOBILITY 2030 (SANDAG 2003). The impacts addressed in this EIR include the effects of commuting to and from work and home, light industrial or commercial operations, and new construction. The majority of the following discussion of air quality in the San Diego region as it relates to implementation of the Draft General Plan will focus on emissions of automobiles and other mobile sources of harmful pollutants and construction-related emissions.

Carbon Monoxide, Ozone and Hydrocarbons, and Nitrogen and Sulfur Oxides

From 2004 to 2030, SANDAG estimates that the population in the City will increase 28 percent to 1,656,257, while the number of housing units is expected to increase by 24 percent or 119,783. While the Draft General Plan provides the policy framework to address this growth, actual land use designations are made through the City's community plans. Typically there is a direct positive relation to new population, automobile use, and resultant pollutant emission. However, much of the new residential development is proposed to occur around transit-accessible nodes and alternative transportation means is a strategy encouraged by the Draft General Plan and previous plans. This relieves some of the increased automobile trips that would have otherwise occurred without alternative transportation planning in mind.

Transportation plans and programs associated with the Draft General Plan must conform to the purpose of the SIP for the attainment of the NAAQS and state air quality standards to avoid significant impacts on air quality. This can be achieved by including air quality planning committed to attaining federal and state air quality goals such as (1) providing for greater integration of the transportation and air quality planning process; (2) ensuring that transportation plans, programs, and projects conform with the SIP and contribute to attainment of the NAAQS; and (3) reducing the growth in VMT and congestion in areas that have not attained the NAAQS.

A major goal of the Draft General Plan to protect air quality in the region will be to continue to implement the RAQS to achieve federal and state air quality standards. One way to achieve the RAQS will be to implement the TCMs contained in the federal and state air quality plans such as ridesharing, transit improvements, traffic flow improvements, and bicycle facilities and programs. Traffic flow improvements will reduce the amount of pollution created by vehicle emissions by reducing the amount of time vehicles spend on roads, while ridesharing, transit improvements, and bicycle facilities and programs will reduce VMT.

Air quality conditions can also be improved with the implementation of programs and needed infrastructure to increase the availability and usage of energy-efficient vehicles such as hybrid electric vehicles, electric vehicles, or those that run on alternative fuels. Replacing combustion engine vehicles with these other options will reduce the amount of harmful emissions produced by vehicles. These efforts to combat mobile sources of pollution will be supplemented by emission control programs for stationary sources.

Overall, implementation of the Draft General Plan would benefit the region's air quality by helping to relieve traffic congestion and by encouraging the use of more efficient transportation methods. As described in **Section 3.15** Transportation/Traffic/Circulation/Parking of this EIR, the percentage of VMT at a level of service (LOS) E or F is expected to decrease from 57 percent to 39 percent between 2005 and 2030. The future smart growth/City of Villages land use pattern under the Draft General Plan would support a mixed-use development facilitating alternative modes of transportation such as walking or bicycling. The smart growth concept and concentrated urban nodes could reduce average trip distances and encourage transit use. By including policies and actions that conform to air quality planning by the APCD and other agencies, the Draft General Plan would provide for the integration of the transportation and air

quality planning processes. Policies and actions specifically require conformance of the transportation plans and programs with the SIP, RAQS, and TCM Plan, and encourage the conformance of individual projects through the environmental review process. The application of advanced transportation and vehicle technologies and specific measures adopted in the TCM Plan are designed to counter the growth in VMT and congestion. Policies are addressed in the Conservation Element which seeks to assist the regional air quality in meeting state and federal standards. These policies include developing a fuel efficiency policy to reduce fossil fuel use by the City, upgrading energy conservation in City buildings, using CH₄ as an energy source from landfills, preserving and planting trees and vegetation to absorb CO₂ and other pollutants, promoting technological innovations, and encouraging alternative fuels and carpooling. The City will work with the SANDAG, the APCD, and other agencies to strengthen air quality regulations and enhance programs to help meet air quality standards.

Encouraging and creating incentives for energy-efficient design in new developments and promoting the reduction of industrial emissions through use of least-polluting cost-effective processes and technologies will benefit the region's air quality by reducing the amount of harmful pollutants being released into the region's air. Implementing the air quality control policies, programs, and measures as described above will ensure that implementation of the Draft General Plan would not conflict with or obstruct implementation of the applicable Air Quality Management Plan. Similarly, the environmental analysis of the RTP 2030 concluded that implementation of the RTP would not conflict with or obstruct implementation of the RAQS. The CARB, using similar considerations as the RTP and the Draft General Plan, recognizes through the quality improvements above that harmful pollutants resulting from mobile sources will continue to decline; as the precursors to ozone are diminished, attainment under state standards will be reached even with implementation of the Draft General Plan. The implementation of the Draft General Plan overall would have impacts below a level of significance with regards to standards for CO, ozone and hydrocarbons, NO₂ and SO₂.

Particulate Matter and Construction Emissions

As stated above, additional growth in the City of San Diego is projected to occur. This growth is to occur in a manner that is consistent with the Draft General Plan. Construction activities associated with growth could impact the region's air quality. A major source of pollution results from construction equipment that operates on diesel fuel which emits NO_x, CO, and ROG into the air during construction activities. These emissions would have the potential to exceed daily emissions standards set by the APCD. Similarly, construction activities would generate additional vehicle trips by construction workers traveling to and from construction sites. These additional trips would contribute more harmful emissions to the current level of emissions related to existing VMT in the region. Therefore, future development that may occur in the course of implementation of the Draft General Plan will result in localized short term air quality impacts, and this would amount to temporary significant and unavoidable impacts. However, in combination with the large decrease in mobile source pollutants as described above, the overall emissions of NO_x, CO, and ROG will nonetheless still decline and air quality will improve as the Draft General Plan is implemented.

Grading and earth moving activities associated with preparation of the site for construction, would emit PM₁₀ and PM_{2.5} into the air and could potentially exceed daily emissions standards set by the City. These potential impacts related to construction activities associated with the Draft General Plan would cease once construction was completed and thus would be localized and short term. Still, these impacts would be significant despite their short duration. As demolition and other development activities continue, the trend for particulate matter released into the air will rise as anticipated by the CARB (**Table 3.2-6**) and the region will still be in non-attainment for PM₁₀ as a result, in part, of implementation of the Draft General Plan. Therefore, impacts associated with attainment of air quality standards with respect to particulate matter are significant at the program level. Mitigation Framework Measures Draft General Plan policies CE-F.1 through CE-F.8, and programs to reduce ozone and diesel PM have been identified to reduce these program level impacts. Because of the degree of impact and applicability, feasibility, and success of these measures cannot be adequately known for each specific project at this program level of analysis, the program level impact related to the ability of San Diego to meet particulate matter emissions standards remains significant and unavoidable.

Could implementation of the Draft General Plan result in air emissions that could substantially deteriorate ambient air quality, including the exposure of sensitive receptors to substantial pollutant concentrations?

Criteria Pollutants

As analyzed above, the proposed land use changes and growth expected to occur through the duration of the Draft General Plan implementation have the potential to increase PM₁₀ emissions through construction activities which could deteriorate ambient air quality. In addition, the Draft General Plan allows for residential and industrial uses or residential and commercial uses on the same parcels (mixed-use) or on adjacent parcels. This could cause criteria pollutants or other air contaminants produced by industrial or commercial uses to affect the nearby sensitive receptors in residential units or other sensitive land uses. This is a potentially significant impact. Implementation of Draft General Plan policy EP-A.17 would focus residential and industrial collocation in areas not identified as prime industrial lands based on collocation suitability factors listed in Appendix C to the Economic Prosperity Element. Project-level assessments of toxic or hazardous air contaminants from industrial use will be performed to ensure that effects of industrial pollutants will be reduced. Because the degree of impact and applicability, feasibility, and success of these measures cannot be adequately known for each specific project at this program level of analysis, the program level impact related to deterioration of ambient air quality remains significant and unavoidable.

In addition, severe traffic congestion at large intersections could create localized CO “hot spots,” which are areas where an increased number of vehicles are idling at intersections releasing emissions and causing CO concentrations to exceed state and federal standards. One of the main goals of the Draft General Plan is to focus growth into compact, mixed-use activity centers through the implementation of the City of Villages strategy. Future City of Villages developments associated with the General Plan would be designed to facilitate alternative modes of transportation such as walking or bicycling, and could reduce average trip distances and encourage transit use.

However, increases in vehicle congestion associated with increases in urban density could increase the volume of traffic flow at some existing intersections which could potentially create localized “hot spots.” This typically occurs where intersections are below a Level of Service (LOS) E or worse with atmospheric conditions that do not facilitate dispersal of pollutants. The potential for hot spots to develop has been reduced significantly over the years. Implementations of air quality control measures and improvements on car emissions have greatly reduced the background levels of CO within the region. Consequently, this has greatly reduced the likelihood that increases in vehicle congestion will lead to the creation of hot spots.

Overall, impacts associated with degradation of ambient air quality are significant at the program level. Draft General Plan policies CE-F.1 through CE-F.8 and Mitigation Framework Measures have been identified to reduce these program level impacts. Because the degree of impact and applicability, feasibility, and success of these measures cannot be adequately known for each specific project at this program level of analysis, the program level impact related to deterioration of ambient air quality remains significant and unavoidable.

Greenhouse Gases (GHG)

Implementation of the Draft General Plan would result in increased emissions of GHGs, primarily due to increased VMT. The source of the CO₂ is the combustion of gasoline or diesel fuel in the vehicles. Diesel fuel has a slightly higher CO₂ emission factor per gallon than gasoline. Using the emission factors and assumptions provided in **Section 5.2 and Table 3.2.7** Vehicular Greenhouse Emissions (at the end of the section) during implementation of the Draft General Plan would generate approximately 6.7 million tons of carbon-equivalent in 2030. In addition, the City’s Climate Protection Action Plan indicates that approximately one-half of the City’s GHG emissions come from the energy and waste sectors. Thus, the projected population increase by 2030 during implementation of the Draft General Plan is anticipated to generate substantial levels of GHG emissions due to increased energy consumption and waste generation in addition to the GHG emissions associated with increased VMT. At the program-level, this is considered a significant and unavoidable impact. Please see **Section 5.2** of this EIR for a more detailed discussion of global warming impacts and mitigation measures.

3.2.4 Mitigation Framework

Goals, policies, and recommendations enacted by the City combined with the federal, state and local regulations described above provide a framework for developing project level air quality protection measures for future discretionary projects. The City’s process for the evaluation of discretionary projects includes environmental review and documentation pursuant to CEQA as well as an analysis of those projects for consistency with the goals, policies and recommendations of the General Plan. In general, implementation of the above policies would preclude or reduce air quality impacts. Compliance with the standards is required of all projects and is not considered to be mitigation. However, it is possible that for certain projects, adherence to the regulations may not adequately protect air quality, and such projects would require additional measures to avoid or reduce significant air quality impacts. These additional measures would be considered mitigation.

For each future project requiring mitigation (i.e., measures that go beyond what is required by existing regulations), site-specific measures will be identified that reduce significant project-level impacts to less than significant or the project level impact may remain significant and unavoidable where no feasible mitigation exists. Where mitigation is determined to be necessary and feasible, these measures will be included in a Mitigation Monitoring and Reporting Program (MMRP) for the project.

Mitigation Framework Measures summarize general measures that may be implemented to preclude project-level impacts. These measures may be updated, expanded and refined when applied to specific future projects based on project-specific design and changes in existing conditions, and local, state and federal laws.

- For projects that may exceed daily construction emissions established by the City of San Diego, Best Available Control Measures will be incorporated to reduce construction emissions to below daily emission standards established by the City of San Diego. Project proponents must prepare and implement a Construction Management Plan which includes but is not limited to Best Available Control Measures. Appropriate control measures will be determined on a project-by-project basis, and are specific to the pollutant for which the daily threshold may be exceeded. Control measures may include:
 - Minimizing simultaneous operation of multiple construction equipment units;
 - Use of low pollutant emitting equipment;
 - Use of catalytic reduction for gasoline-powered equipment;
 - Watering the construction area to minimize fugitive dust; and
 - Minimizing idling time by construction vehicles.
- Development that could significantly impact air quality, either individually or cumulatively, would receive entitlement only if it is conditioned with all reasonable mitigation to avoid, minimize, or offset the impact. As a part of this process, future projects may be required to buffer sensitive receptors from air pollution sources through the use of landscaping, open space, and other separation techniques.

3.2.5 Significance of Impact with Mitigation Framework

The potential program level impacts on the ability of San Diego to reach the RAQS standards for other criteria pollutants are less than significant.

Particulate matter from construction and concentrated carbon monoxide (CO) “hot spots” would be significant and unavoidable at the program level. The Draft General Plan would have a less than significant impact on ambient air quality for other criteria pollutants.

Greenhouse gas emissions would also be significant and unavoidable. This impact is further discussed in **Section 5.2** of this document.

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**TABLE 3.2.7
VEHICULAR GREENHOUSE GAS EMISSIONS**

Year	Daily VMT ¹	Annual VMT	Fuel Economy (MPG) ²	Total Gasoline Consumption (gallons)	Emission Factors (Lbs./Gallon of Gasoline) ³			Total Vehicular Emissions by GHG (tons)			Global Warming Potential ⁴			Carbon Dioxide Equivalent Emissions (tons)		
					CO ₂	CH ₄	N ₂ O	CO ₂	CH ₄	N ₂ O	CO ₂	CH ₄	N ₂ O	CO ₂	CH ₄	N ₂ O
1990	30,583,000	11,162,795,000	20.300	549,891,379	19.564	0.00055	0.00020	5,379,037	151	55	1	23	300	5,379,037	3,478	16,497
2005	35,014,269	12,780,208,185	21.739	587,893,104	19.564	0.00055	0.00020	5,750,770	162	59	1	23	300	5,750,770	3,718	17,637
2006	35,330,273	12,895,549,645	21.833	590,644,879	19.564	0.00055	0.00020	5,777,688	162	59	1	23	300	5,777,688	3,736	17,719
2020	39,754,333	14,510,331,399	22.779	637,004,759	19.564	0.00055	0.00020	6,231,181	175	64	1	23	300	6,231,181	4,029	19,110
2030	42,914,375	15,663,746,875	22.893	684,215,563	19.564	0.00055	0.00020	6,692,997	188	68	1	23	300	6,692,997	4,328	20,526

1. Section 3.15, Transportation/Traffic.

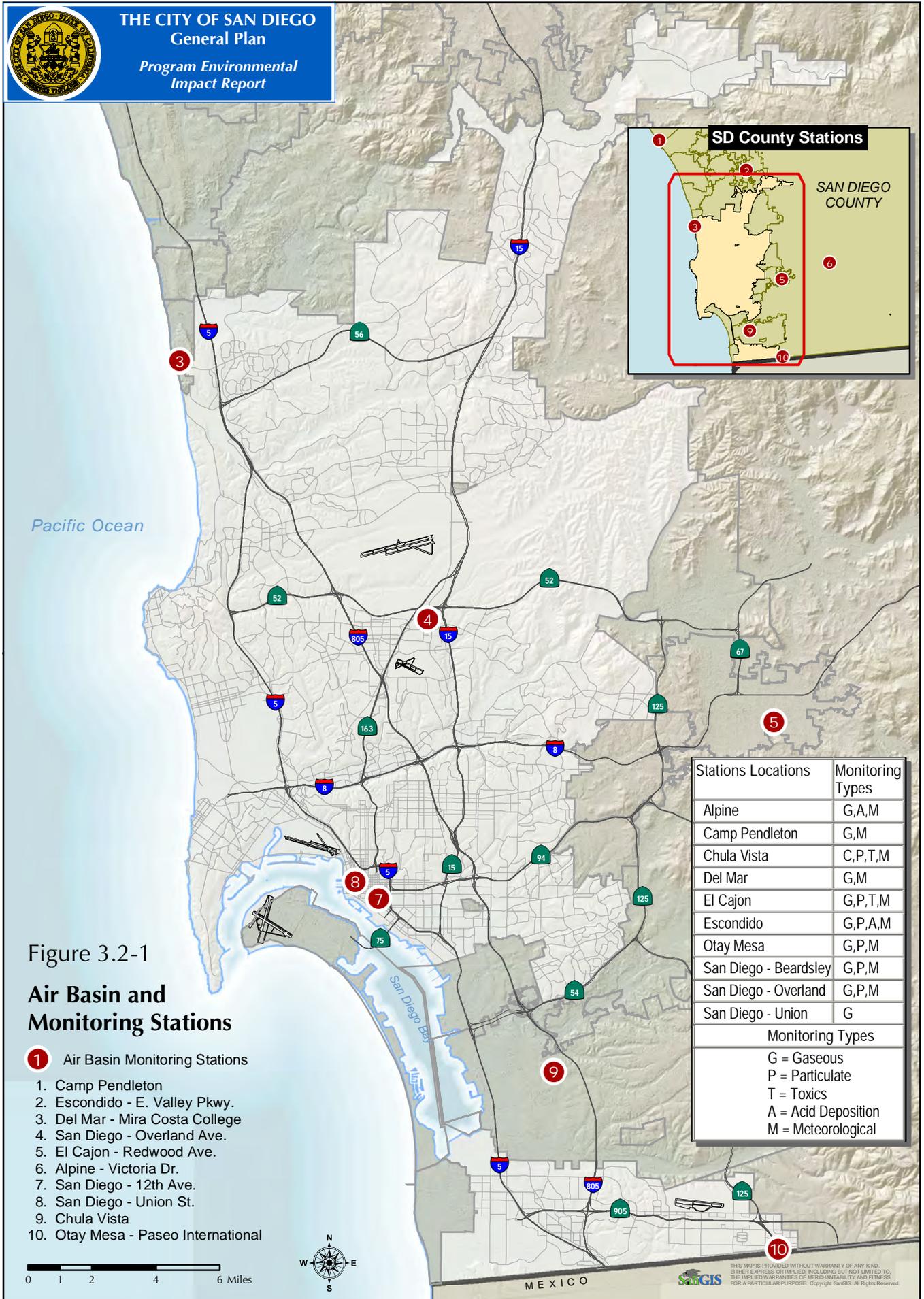


Figure 3.2-1
**Air Basin and
Monitoring Stations**

- 1** Air Basin Monitoring Stations
- 1. Camp Pendleton
- 2. Escondido - E. Valley Pkwy.
- 3. Del Mar - Mira Costa College
- 4. San Diego - Overland Ave.
- 5. El Cajon - Redwood Ave.
- 6. Alpine - Victoria Dr.
- 7. San Diego - 12th Ave.
- 8. San Diego - Union St.
- 9. Chula Vista
- 10. Otay Mesa - Paseo International

Stations Locations	Monitoring Types
Alpine	G,A,M
Camp Pendleton	G,M
Chula Vista	C,P,T,M
Del Mar	G,M
El Cajon	G,P,T,M
Escondido	G,P,A,M
Otay Mesa	G,P,M
San Diego - Beardsley	G,P,M
San Diego - Overland	G,P,M
San Diego - Union	G
Monitoring Types	
G = Gaseous	
P = Particulate	
T = Toxics	
A = Acid Deposition	
M = Meteorological	

3.3 BIOLOGICAL RESOURCES

3.3.1 Existing Conditions

Regional Overview

The influences of climate, topography, and soils combine to determine the character of the biological environment of a region. Each of these factors varies greatly throughout San Diego, resulting in a diversity of vegetation communities which include coastal wetlands, grasslands, vernal pools, sage scrub, chaparrals, riparian woodlands, oak woodlands, coniferous forests, and creosote bush scrub. The San Diego region contains habitats and species that are considered to be sensitive by state and federal agencies, affected local jurisdictions and conservation organizations. The San Diego region has been identified as a major “hot spot” for biodiversity and species endangerments. Many unique and endangered species are found only in this region.

Sensitive Resources

The biological resources documented in this section were determined through an extensive review of the most current biological literature and Geographical Information Systems (GIS) data available for the City of San Diego. Vegetation communities and sensitive plant and animal species were identified based on the regional vegetation map, prepared by the City of San Diego, which is incorporated into the Multiple Species Conservation Program (MSCP) database San Diego GIS 1995 (SANGIS 1995). General flora and fauna species were determined based on the identified vegetation communities and the species that typically occur in these habitats (**Figure 3.3-1**).

Biological Habitats and Communities

A host of upland and wetland vegetation communities, defined according to the current Holland Code (HC) classification system (Holland 1986) and San Diego County terrestrial vegetation community descriptions (Oberbauer 1996), occur within the City of San Diego. For ease of discussion, some of the habitats have been grouped under broader habitat categories that are specifically addressed within the City Land Development Manual – Biology Guidelines (as amended July, 2002). These categories are organized by habitat tiers, as specified in the City’s Biology Guidelines, rather than natural habitat groupings (**Table 3.3-1**).

Table 3.3-1 Habitat Types within the City of San Diego	
UPLAND HABITATS	
	Habitat Type
Tier I: (rare uplands)	Southern Foredunes Torrey Pines Forest Coastal Bluff Scrub Maritime Succulent Scrub Maritime Chaparral Scrub Oak Chaparral Native Grassland Oak Woodland
Tier II: (uncommon uplands)	Coastal Sage Scrub (CSS) CSS/Chaparral
Tier III A: (common uplands)	Chaparral Mixed Chaparral Chamise Chaparral
Tier III B: (common uplands)	Valley and Foothill Grasslands Non-native Grasslands
Tier IV: (other uplands)	Urban/Developed Disturbed Agriculture Eucalyptus Woodland
WETLAND HABITATS	
Coastal	Salt Marsh Salt Panne/Mudflat
Riparian	Oak Riparian Forest Riparian Forest Riparian Woodland Riparian Scrub/Riparian Scrub in the Coastal Overlay Zone Riparian and Bottomland Habitat
Freshwater Marsh	Freshwater Seep Freshwater Marsh/Freshwater Marsh in the Coastal Overlay Zone
Disturbed Wetland	Disturbed Wetland
Unvegetated Freshwater	Non-vegetated Channel, Floodway, Lakeshore Fringe Unvegetated Habitat Freshwater
Marine Habitats	Unvegetated Habitat Estuarine Unvegetated Habitat Beach Unvegetated Habitat Marine Intertidal Unvegetated Habitat Marine Subtidal Unvegetated Habitat Shallow Bay Unvegetated Habitat Intermediate Bay

Source: Merkel & Associates, 2003

Upland Habitats

Tier I Habitats – Rare Uplands

Tier I habitats include the upland habitats that are considered to be rare within the City of San Diego. These habitats have suffered substantial historic losses on top of naturally narrow distribution patterns, such as in the case of southern foredunes and Torrey pine woodlands. Tier I habitats were once common, as was the case for native grasslands, but other historic land conversion has resulted in precipitous declines that threaten the continued persistence of the habitats in the region.

Southern Foredunes

Southern foredunes (HC 21230) are a relatively uncommon constituent of today's City beaches, but two hundred years ago were widely dispersed at the upper edge of the region's oceanic high tides where they occupied hummocky areas of sand and the interstitial swales. The most common components of this vestigial vegetation are two species of abronia (*Abronia maritima*, *A. umbellata*), beach evening primrose (*Camissonia cheiranthifolia*), and beach ambrosia (*Ambrosia bipinnatisecta*).

Torrey Pines Forest

This remnant coniferous forest habitat (HC 83140) is now restricted in the mainland United States to several stands of Torrey pines at Torrey Pines State Park and around the city of Del Mar. It appears to rely on moisture supplied by frequent fogs and is strongly correlated with marine sandstone substrate.

Coastal Bluff Scrub

Few native plants can survive on the erosive slopes of San Diego's coastal bluffs. Typically, this scrub (HC 31000) is comprised of plants that are adapted to a regime of fogs, and a generally wetter environment that is found a short distance inland, including some succulent-leaved plants such as *Coreopsis* spp. and coast pincushion flower (*Chaenactis glabriuscula* var. *orcuttiana*). Other plants are adapted to salt tolerant conditions and include species of saltbush (*Atriplex* spp.) and pineapple weed (*Chamomilla suaveolens*). This vegetation community is declining as the bluffs erode, where very disturbed weedy mesa vegetation is replacing the existing coastal bluff scrub.

Maritime Succulent Scrub

This scrub (HC 32400) is largely associated with the flora in northern Baja California. It occurs in the United States primarily in the extreme southwestern portions of San Diego County near the Mexican border. Dominant shrubs here typically include jojoba (*Simmondsia chinensis*) and flat-top buckwheat (*Eriogonum fasciculatum*). This phase of sage scrub also includes several desert elements such as four-wing saltbush (*Atriplex canescens*), waterjacket (*Lycium andersonii*), and sometimes very unusual species for western San Diego County such as smooth-stemmed fagonia (*Fagonia laevis*) and desert filaree (*Erodium texanum*).

Maritime Chaparral

This phase of coastal chaparral, southern maritime chaparral (HC 37C30) located on north-facing slopes is a vestigial remnant of the wetter and cooler Pleistocene. It generally is restricted to sandstone substrates and usually includes at least one of the following shrub species: Del Mar

manzanita (*Arctostaphylos glandulosa* ssp. *crassifolia*), Nuttall's scrub oak (*Quercus dumosa*), and/or coast white lilac (*Ceanothus verrucosus*).

Scrub Oak Chaparral

Scrub oak chaparral (HC 37900) is a dense, evergreen chaparral reaching up to 20 feet tall. The vegetation is dominated by Nuttall's scrub oak (*Quercus dumosa*), with inclusions of interior mountain-mahogany (*Cercocarpus betuloides* var. *betuloides*) and a substantial accumulation of leaf litter. This chaparral type typically occurs in more mesic (moist) locations, and often at a slightly higher elevation, than other chaparral types, thus enabling the vegetation to recover more quickly from fire.

Native Grassland

Valley needlegrass grassland (HC 42110) typically supports extensive stands of purple needlegrass (*Nassella pulchra*) as the indicator species for its presence. A limited association of herbaceous perennials and annuals are often found growing among the clumps of needlegrass – including several rare species.

Oak Woodland

Oak woodlands within the City of San Diego are dominated by coast live oak woodlands (HC 71160). These habitats are evergreen woodlands primarily dominated by coast live oak (*Quercus agrifolia*); with a relatively open and low-growing understory that supports perennial grasslands, annuals, and herbaceous perennials, as well as a mix of shrubs and sometimes-dense thickets of western poison oak. Additional characteristic flora species include California blackberry, San Diego sedge (*Carex spissa*), California coffeeberry (*Rhamnus californica*), California rose (*Rosa californica*), nodding needlegrass (*Nassella cernua*) and large clarkia (*Clarkia purpurea*).

Dense coast live oak woodland (HC 71162) is a dense phase of oak woodland characterized by a contiguous canopy of coast live oak with few additional tree or shrub components. The understory may be less diverse than that associated with a less mature phase of oak woodland.

Tier II Habitats – Uncommon Uplands

Coastal Sage Scrub

The most common native vegetation type remaining within the boundaries of the City of San Diego (MSCP Table of Vegetation Communities 1998) is Diegan coastal sage scrub (HC 32500). This phase of sage scrub is a low-lying, relatively open scrub with desert affinities, and is comprised of soft-woody, drought deciduous species that provide the majority of the vegetative cover. Characteristic flora species include California sagebrush (*Artemisia californica*), coyote brush (*Baccharis pilularis*), California encelia (*Encelia californica*), goldenbush (*Isocoma menziesii*), laurel sumac (*Malosma laurina*), foothill needlegrass (*Nassella lepida*), lemonadeberry (*Rhus integrifolia*), black sage (*Salvia mellifera*), San Diego monkeyflower (*Mimulus aurantiacus*), and California brickellbush (*Brickellia californica*).

A disturbed form of coastal sage scrub is broom baccharis scrub. This habitat supports many of the same species as Diegan sage scrub, but is typically found as a disturbance following community that is generally best developed along alluvial floodplains and within areas of sandy soils. The habitat is dominated by broom baccharis (*Baccharis sarothroides*).

Coastal Sage Scrub/Chaparral

This “hybrid” of two common vegetation types (HC 37G00) usually indicates either an area of sage scrub growing on disturbed substrates, converting into a mature chaparral vegetation; or a mature ecotone in which ecological conditions for each of these two vegetation types does not allow one habitat type to out-compete the other.

Tier IIIA Habitats – Common Uplands*Chaparral*

Chaparral (HC 37200), generally including mixed chaparral and chamise chaparral as described below, typically occupies dry, rocky, and often steep north-facing slopes, and is dominated by relatively tall (between 1.5-3 meters), broad-leaved, deep rooted woody shrubs. Chaparral vegetation located on south-facing slopes is typically more open and can form a mosaic with sage scrub vegetation. Identification of shrub dominants usually allows for a more specific phase of chaparral to be identified.

Mixed Chaparral - Southern mixed chaparral (HC 37120) is a mid-sized to tall chaparral, with limited shrub diversity in drier areas, but a floristically varied understory with numerous species of subshrubs, herbaceous perennials, bulbs and annuals in shaded and wetter areas. Characteristic flora species include mission manzanita (*Xylococcus bicolor*), Ramona ceanothus (*Ceanothus tomentosus*), San Diego mountain-mahogany (*Cercocarpus minutiflorus*), holly-leaf redberry (*Rhamnus ilicifolia*), sugar bush (*Rhus ovata*) and fuchsia-flowered gooseberry (*Ribes speciosum*).

Chamise Chaparral - Chamise chaparral (HC 37200) is locally common on poorly developed soils throughout the City, and is a lower growing chaparral community dominated by chamise (*Adenostoma fasciculatum*), with comparatively limited shrub diversity and arid understory conditions.

Tier IIIB Habitats – Common Uplands*Valley and Foothill Grassland*

This general vegetation category indicates there is insufficient information to more accurately identify the grassland components present (HC 42000). Included here may be areas of scattered native perennial grasses interspersed with larger stands of introduced non-native grasses. This habitat is classified as a Tier IIIB habitat for this analysis since it is highly probable that the majority of this habitat will ultimately be determined to be non-native grasslands rather than native grasslands when reviewed at the project-specific level.

Non-native Grassland

Non-native grasslands (HC 42200) are widely dispersed throughout the San Diego region. This “introduced” grassland consists of a dense to open cover of predominantly Eurasian grasses that have become widespread on disturbed or heavily grazed lands. Local grasslands are dominated by non-native grasses such as bromes (*Bromus madritensis* ssp. *rubens*, *B. hordeaceus* and *B. diandrus*) and slender wild oat (*Avena barbata*), as well as non-native forbs, such as mustard (*Hirshfeldia incana* and *Brassica nigra*), and filarees (*Erodium brachycarpum*, *E. cicutarium*, and *E. moschatum*). The quality of these grasslands is expected to coincide with the quality of the surrounding vegetation communities and land uses.

Tier IV Habitats – Other Uplands

Urban/Developed

Much of the peripheral study area (OC 12000) is comprised of residential and commercial development dominated by non-native/exotic vegetation, eucalyptus woodland, and disturbed habitats. Urban and semi-urban areas contain numerous and varied horticultural plantings located within residential yards, active-use parklands, and golf courses. In the older, urbanized portions of the City, tall exotic plantings, such as eucalyptus trees (*Eucalyptus* sp.) with allelopathic toxins that tend to inhibit understory growth, form well developed, and dense woodlands. Occasionally, other planted woodlands such as introduced pines, ash, and elm are present. Disturbed areas are typically located adjacent to urbanization and contain a mix of primarily weedy species, including non-native forbs, annuals, and grasses, usually found pioneering on recently disturbed soils. Characteristic weedy species include prickly sow thistle (*Sonchus asper*), common sow thistle (*Sonchus oleraceus*), bristly ox-tongue (*Picris echioides*), Russian thistle (*Salsola tragus*), giant reed, hottentot-fig (*Carpobrotus edulis*), wild lettuce (*Lactuca serriola*), tree tobacco (*Nicotiana glauca*), castor-bean (*Ricinus communis*), pampas grass, smooth cat's-ear (*Hypochoeris glabra*), red-stem filaree (*Erodium cicutarium*), short-beak filaree (*Erodium brachycarpum*) and white-stem filaree (*Erodium moschatum*). These urban lands do not typically contain native vegetation or provide essential habitat connectivity; and therefore, tend to have reduced biological value.

Disturbed Habitat

Disturbed habitat is another broad category of disturbed lands (OC 11300) that usually supports no vegetation, or retains only pioneering weedy species, but does not include a disproportionately strong component of non-native grasses. Such disturbed habitats may establish on recently graded or severely brushed lands.

Agriculture

Agricultural practices throughout the City are quite varied. They include orchards and vineyards, intensive agriculture such as dairies, and extensive field crop and livestock grazing agriculture.

While once a distinctive characteristic of the region in the late 1800s and early 1900s, today only small portions of the City of San Diego are still comprised of groves/orchards (OC 18100), consisting primarily of woody crops such as citrus fruits and avocados. The majority of these crops are located to the north and east of the City infrastructure -- within the foothills and along the San Pasqual Valley. Herbaceous understory growth may be planted or provide natural cover, and is typically open in density to facilitate with crop harvesting. Although groves and orchards also tend to have reduced biological value, they do provide cover for wildlife movement, as well as perch and nest sites for raptorial (relating to or characteristic of birds of prey) and passerine (perching birds and songbirds such as the jays, blackbirds, finches, warblers, and sparrow species).

Few such areas under the general agricultural heading (OC 18200) remain within the City. Where present, such as in portions of the San Pasqual Valley, habitat within the active footprint areas is usually extremely degraded and devoid of any significant biological resources.

Truck crops (OC 18300) are still occasionally planted in the extreme northern and southern portions of the City of San Diego. Typically all areas historically used for agriculture (controlled

by the owner/renter) that can be deeply disked and planted for harvest are employed for that purpose. Fallow areas of agricultural fields overwhelmingly consist of non-native weedy species. Occasionally, rare bulbs may survive in lightly disked fields that have not been regularly planted.

Eucalyptus Woodland

Eucalyptus woodland (OC 11100) is a prominent component of the City's canyon lands, but is a relatively late introduction into the region. Quite a few eucalyptus species were intentionally introduced from arid portions of Australia to provide a readily grown tree. The understory within eucalyptus woodland is often devoid of all but the most ubiquitous non-native weeds.

Botanical Resources-Flora

San Diego County has the highest floristic diversity of any county in the continental United States and the City of San Diego hosts the highest floristic diversity of any city in the county. The diversity of the City of San Diego is attributable both to the size of the City as well as the diverse array of habitats that it includes. Among the most floristically diverse regions of the City are coastal canyons that support remnants of once more common scrub communities. In a general sense, the diversity of the City's flora decreases away from the coast and to the north; such that the highest floristic diversity in the City is observed in the southwestern regions while the lowest floristic diversity is found in the northeastern portions of the City. Over the past century, the native flora of the City has been increasingly impacted. This has occurred as a result of rapidly changing land uses that have led to the loss of much of the region's native habitat, particularly on the immediate coast and over the flat coastal plains. In addition there has been a continued degradation of the remaining natural areas by intensifying recreational pressures, alteration of fire conditions, and perhaps most importantly, the expansion of invasive exotic plant species. As a result of these historic impacts, the flora with the highest affinity for coastal environments has been tremendously diminished within the City and only remnant representatives of the original floral diversity remain along the coastal fringe and within urban canyons. Conversely, the data are too coarse to include smaller drainages that may be found via field surveys.

Zoological Resources-Fauna

The City of San Diego is located within a coastal plain largely developed with urban and agricultural uses, but still retains a network of undeveloped canyonlands. Such development now limits the extent and connectivity of the wildlife habitat; however, the identified native vegetation communities, and to some extent the non-native categories, support a number of locally common, as well as sensitive species. The following text discusses many of the faunal groups occurring within the City limits. Faunal species are discussed in a regional context; therefore, existing site-specific conditions may differ from this more generic coverage. Sensitive species are not specifically discussed in these summary sections since they are addressed in more detail later in this document.

Invertebrates

Limited cohesive information is available to provide a thorough description of the many invertebrate fauna found within the City of San Diego region; however, the range of butterfly species and vernal pool branchiopods has been fairly well documented within the City. Butterfly

species occur in a wide range of habitats; including sage scrub and chaparral, open areas devoid of substantial shrub cover such as non-native grasslands and agricultural/disturbed land, as well as more densely vegetated areas such as riparian habitat and oak woodlands. These habitats provide various host-specific plants suitable for larval development, adult nectar resources; as well as topographical features, such as hilltops or open ground that aid in courtship and mating. In contrast, vernal pool branchiopods are strongly restricted to vernal pool habitat, and consequently, many of these species are considered to be sensitive.

Fishes

Insufficient information exists to provide a complete description of the freshwater fish associations found within the City of San Diego. While fish species within the various reservoirs are fairly well known, fish occurring along the City's streams are not well documented. The only native freshwater fish species potentially present within the study area is an almost extinct race of steelhead trout (*Oncorhynchus mykiss*) that once spawned in some of the larger stream systems of Southern California. Within the City of San Diego, this species once occurred in such drainages as the San Diego River and Rose Creek; however, it was extirpated (exterminated) in the middle of the last century. The freshwater fish community occurring in the area's reservoirs and streams are presently believed to consist exclusively of exotic species that have been introduced at various times over the past two centuries to provide game fish and a forage base. Fish species found in the City include largemouth bass, a number of centrarchid sunfish, bluegill, black crappie, threadfin shad, several catfish, rainbow trout, carp and goldfish, several minnows, and the ubiquitous mosquitofish (*Gambusia affinis*). While most of the established fish populations are found in association with the major reservoirs and deeper ponds along perennial streams and rivers in the City, mosquitofish have been introduced in nearly every freshwater body as a biotic control of mosquitos.

Amphibians

Amphibians typically occur in riparian habitats with peripheral upland vegetation. Riparian ecosystems often provide temporary ponding water used as breeding habitat by various amphibious species, as well as abundant vegetation for cover and foraging. Amphibians will also create burrows in adjacent upland habitats, such as sage scrub and non-native grasslands, where they will aestivate (or spend time in a dormant state, similar to hibernation). Amphibian species known or with a potential to occur in the San Diego region include the garden slender salamander (*Batrachoseps major*), arboreal salamander (*Aneides lugubris*), western toad (*Bufo boreas*), California chorus frog (*Pseudacris cadaverina*), Pacific chorus frog (*Pseudacris regilla*), and the bullfrog (*Rana catesbeiana*), a non-native species. Two sensitive species, the western spadefoot toad (*Scaphiopus hammondi*) and arroyo toad (*Bufo californicus*) also occur within the City at a few locations.

Reptiles

Relatively uncommon in coastal canyons and other Environmentally Sensitive Lands (ESL) is the western whiptail lizard (*Cnemidophorus tigris*); a species more typically seen in the inland arid foothill region. In contrast, the sensitive orangethroat whiptail (*Cnemidophorus hyperythrus*), which has a sporadic but widespread range in coastal San Diego County, is locally common within areas of native vegetation, including peripheral wetlands habitat. Western fence

lizards (*Sceloporus occidentalis*) and side-blotched lizards (*Uta stansburiana*) are common to abundant in open areas throughout the City's canyons. Southern alligator lizards (*Elgaria multicarinata*) are regularly found in ecotonal habitat on the periphery of residential areas. Expected to occur occasionally in open, sandy habitat in areas of sage scrub is the coast horned lizard (*Phrynosoma coronatum blainvillei*). This lizard needs an abundant supply of ants as a food source, and is heavily predated upon by feral cats and pet collecting children.

Western pond turtle (*Clemmys marmorata*) are known to occur in many stock ponds and riverine pools within the City's canyon, but are now extirpated from most of their natural habitats. The pond slider (*Chrysemys scripta*) is an introduced species that is also found regionally. This large aquatic turtle is native to the eastern United States and various areas of Mexico.

The western rattlesnake (*Crotalus viridis helleri*) is commonly found within the canyons of the City and is most often encountered along the riparian fringe of urban canyons. During the summer months, this species often moves up to irrigated yards along canyon crests where it is often killed. While regionally common, this snake is being depleted in more urbanized areas. The larger ponds and marsh areas along the major rivers are particularly suitable to the requirements of the two-striped aquatic garter snake (*Thamnophis hammondi*). This species has been historically observed in many of these wetlands regionally.

Common reptiles such as the gopher snake (*Pituophis melanoleucus*), the coachwhip (*Masticophis flagellum*), the California striped racer (*Masticophis lateralis*), and common kingsnake (*Lampropeltis getulus*) occur within many of the region's canyons. Herpetologist Lawrence Klauber's field notes (unpublished/undated) from the first half of the 20th century include a variety of canyon sightings for now locally uncommon or infrequently observed species such as the glossy snake (*Arizona elegans*), the ringneck snake (*Diadophis punctatus*), the night snake (*Hypsiglena torquata*), and the long-nosed snake (*Rhinocheilus lecontei*). These species are likely depleted from the levels noted by Klauber.

Numerous species of lizards and snakes use rock crevices for cover within sage scrub and open chaparral habitat, and feed on small insects and insect larvae among the leaf litter. Other species are found in grasslands and agricultural/disturbed land, or in riparian areas and hunt small rodents. Quality reptilian habitat, primarily consisting of sage scrub, rocky outcrops, chaparral and oak woodland, is still located at many canyon sites; however, the small patch size available for various species makes local population extirpations increasingly more difficult to deter.

Birds

Over four hundred species of birds have been reported within the environs of the City of San Diego, supporting some of the highest avian diversity in the United States. Both yellow-breasted chats (*Icteria virens*) and yellow warbler (*Dendroica petechia*) also nest locally in this habitat. Also noteworthy due to its sensitive status is the California gnatcatcher (*Polioptila californica*). There are many historical sightings of this gnatcatcher in open space, privately owned lands and on other sensitive lands.

A number of common birds, which nest in riparian woodland or adjacent sage scrub uplands in San Diego County, are known to nest in the City's canyons and other ESL. These include the Anna's hummingbird (*Calypte anna*), black-chinned hummingbird (*Archilochus alexandri*),

mourning dove (*Zenaida macroura*), great horned owl (*Bubo virginianus*), burrowing owl (*Athene cunicularia*), black phoebe (*Sayornis saya*), cliff swallow (*Hirundo pyrrhonota*), common raven (*Corvus corax*), bushtit (*Psaltriparus minimus*), house finch (*Carpodacus mexicanus*), black-headed grosbeak (*Pheucticus melanocephalus*), spotted towhee (*Pipilo maculatus*), California towhee (*Pipilo crissalis*), red-winged blackbird (*Agelaius phoeniceus*), tricolored blackbird (*Agelaius tricolor*), phainopepla (*Phainopepla nitens*), ash-throated flycatcher (*Myiarchus cinerascens*), orange-crowned warbler (*Vermivora celata*), common yellowthroat (*Geothlypis trichas*), song sparrow (*Melospiza melodia*), hooded oriole (*Icterus cucullatus*), northern oriole (*Icterus galbula*), lesser goldfinch (*Carduelis psaltria*), and American goldfinch (*Carduelis tristis*). Many other birds, primarily migrants and winter visitors, use the riparian trees as they pass through the coastal lowlands to and from their breeding grounds to the north and south. Migrant songbirds from the Emberizidae family found in spring include Nashville warbler (*Vermivora ruficapilla*), black-throated gray warbler (*Dendroica nigrescens*), hermit warbler (*Dendroica occidentalis*), Townsend's warbler (*Dendroica townsendi*), MacGillivray's warbler (*Oporornis tolmiei*), and Wilson's warbler (*Wilsonia pusilla*).

Some species of waterfowl more typically found in large bays and ponds occur seasonally and sporadically in coastal canyon wetlands and on the City's reservoirs. These include lesser scaup (*Aythya affinis*), bufflehead (*Bucephala albeola*), northern pintail (*Anas acuta*), ruddy duck (*Oxyura jamaicensis*), eared grebe (*Podiceps nigricollis*), Clark's grebe (*Aechmophorus clarki*), western grebe (*Aechmophorus occidentalis*), northern shoveler (*Anas clypeata*), canvasback (*Aythya valisineria*), and redhead (*Aythya americana*). Other species detected that are often associated with freshwater marshes and ponds include pied-billed grebe (*Podilymbus podiceps*), green-winged teal (*Anas crecca*), cinnamon teal (*Anas cyanoptera*), sora rail (*Porzana carolina*), common moorhen (*Gallinula chloropus*), and American coot (*Fulica americana*).

Some avian species such as the greater roadrunner (*Geococcyx californianus*) are now rarely observed in the City open space. These large ground-dwelling cuckoos are becoming less and less common in coastal Southern California as their open scrubland habitat is developed.

Numerous birds of prey still regularly use open space for hunting. These include white-tailed kite (*Elanus leucurus*), northern harrier (*Circus cyaneus*), red-tailed hawk (*Buteo jamaicensis*), sharp-shinned hawks (*Accipiter striatus*), merlin (*Falco columbarius*), golden eagle (*Aquila chrysaetos*), peregrine falcon (*Falco peregrinus*), Cooper's hawk (*Accipiter cooperii*), American kestrel (*Falco sparverius*), and red-shouldered hawk (*Buteo lineatus*).

Native and non-native vegetation communities provide habitat for numerous species of resident and migratory birds. A number of common avian species breed within sage scrub and chaparral habitats, and forage among the leaf litter in the vegetative understory. Rocky outcrops, particularly on undisturbed slopes or peaks can provide significant perching or roosting sites for raptors; and grasslands and agricultural lands located adjacent to woodland areas provide significant foraging habitat for resident, wintering and migrant raptors. Avian diversity and abundance is substantial within riparian and oak woodland habitats. These habitats are comprised of several horizontal niches including canopy, shrub, herb, and ground, which provide a network of valuable roosting, foraging and breeding areas for birds. Quality avian habitat within the City of San Diego is concentrated where the vegetation is less disturbed and provides habitat connectivity; however, the various creeks and tributaries within the City of San Diego also provide some measure of habitat connectivity, and potential avian breeding and foraging areas.

Mammals

Without trapping, the presence of mammal species must be discerned through habitat suitability, species range and biological records. Many mammals are nocturnal and secretive, and indirect signs for a number of species, particularly rodents, can be similar. Small mammal species typically occur in sage scrub, chaparral, grasslands and agricultural/disturbed areas, and several of these species will intermittently use riparian and woodland habitats for foraging and cover. Various species of bats will also forage in grasslands and woodland habitats. Larger mammals often require greater blocks of connected habitat for hunting and travel within their range. Quality habitat for small mammal species is generally located throughout the study area, but as with reptiles, small remaining patch size can undercut the ability of some species populations to survive in open space.

Despite the extensive urban development within the City core, a number of regionally common mammals still reside within City open space and other now often isolated pockets of remaining native vegetation. Included are coyote, desert cottontail, California ground squirrel, Virginia opossum, and striped skunk.

Threatened, Endangered, Endemic and Sensitive or MSCP Covered Species

Sensitive Flora

Table 3.3-2 summarizes the sensitive plant species that could be affected by the proposed Programs. Sensitive plants include those listed by United States Fish Wildlife Service (USFWS) (1999), CDFG (2002), the California Native Plant Society (CNPS) (Smith and Berg 1988), and Narrow Endemic Species (City of San Diego 2001). The following abbreviations are used in the table: FE = Federally Endangered, FT = Federally Threatened, FSC = Federal Species of Special Concern, SE = State Endangered, SR=State Rare, NE = Narrow Endemic Species; habitat codes are synonymous to those used in the California Native Plant Society's Inventory of Rare and Endangered Vascular Plants of California (Skinner and Pavlik 1994), including CCFrs = closed-cone conifer forest, Chprl = chaparral, CoScr = coastal scrub, CmWld = cismontane woodland, MshSw = marshes and swamps, Medws = meadows and seeps, RpWld = riparian woodland, VFGrS = valley and foothill grassland.

Scientific Name	Common Name	Habitat	Federal Status	California Status	CNPS List	MSCP Covered
<i>Acanthomintha ilicifolia</i>	San Diego thorn-mint	Chprl, CoScr, VFGrs, /clay	FT	SE	1B	Covered NE
<i>Adolphia californica</i>	California adolphia	Chprl, CoScr	None	None	2	Not Covered
<i>Agave shawii</i>	Shaw's agave	CoScr	None	None	2	Covered NE
<i>Ambrosia pumila</i>	San Diego ambrosia	CoScr, RpWld	FE	None	1B	Covered NE
<i>Aphanisma blitoides</i>	aphanisma	CoScr	None	None	1B	Covered NE
<i>Arctostaphylos glandulosa</i> <i>ssp. crassifolia</i>	Del Mar manzinita	Chprl	FE	None	1B	Covered
<i>Arctostaphylos otayensis</i>	Otay manzinita	Chprl	FE	None	1B	Covered
<i>Astragalus deanei</i>	Dean's milk-vetch	CoScr, Chprl	None	None	1B	Covered
<i>Astragalus tener var. titi</i>	coastal dunes milk-vetch	Dunes	FE	SE	1B	Covered NE
<i>Baccharis vanessae</i>	Encinitas baccharis	Chprl (sandstone)	FT	SE	1B	Covered NE
<i>Bergerocactus emoryi</i>	goldenspined cereus	CoScr, Chprl	None	None	2	Not Covered
<i>Brodiaea orcutti</i>	Orcutt's brodiaea	CCFrS, Chprl, CmWld, Medws, VFGrs, clay	None	None	1B	Covered
<i>Calamagrostis koelerioides</i>	dense reed grass	Chprl	None	None	None	Covered
<i>Calochortus dunnii</i>	Dunn's mariposa lily	Chprl	None	SR	1B	Covered
<i>Caulanthus stenocarpus</i>	slender pod jewelflower	Chprl, CoScr	None	SR	None	Covered
<i>Ceanothus cyaneus</i>	lakeside ceanothus	Chprl	None	None	1B	Covered
<i>Ceanothus verrucosus</i>	wart-stemmed ceanothus	Chprl	FSC	None	2	Covered
<i>Centromadia pungens</i> ssp. <i>laevis</i>	smooth tarplant	VFGrs	None	None	1B	Not covered
<i>Chamaebatia australis</i>	southern mountain misery	Chprl	None	None	4	Not covered
<i>Chorizanthe orcuttiana</i>	Orcutt's spineflower	CoScr	FE	SE	1B	Covered
<i>Comarostaphylis</i> <i>diversifolia</i> ssp. <i>diversifolia</i>	summer-holly	Chprl	None	None	1B	Not Covered

Scientific Name	Common Name	Habitat	Federal Status	California Status	CNPS List	MSCP Covered
<i>Convolvulus simulans</i>	small-flowered morning glory	Chprl (openings)	None	None	4	Not covered
<i>Cordylanthus orcuttianus</i>	Orcutt's bird's-beak	CoScr	None	None	2	Covered
<i>Corethrogyne filaginifolia</i> var. <i>incana</i>	Point Loma sand aster	Chprl	None	None	1B	Not Covered
<i>Corethrogyne filaginifolia</i> var. <i>linifolia</i>	Del Mar sand aster	CoScr, Chprl, VFGrs	None	None	1B	Covered
<i>Deinandra conjugens</i>	Otay tarplant	VFGrs	FT	SE	1B	Covered NE
<i>Dichondra occidentalis</i>	western dichondra	Chprl, CoScr	None	None	4	Not covered
<i>Dudleya blochmaniae</i> ssp. <i>blochmaniae</i>	Blochman's dudleya	CoScr	FSC	SE	1B	Covered NE
<i>Dudleya variegata</i>	variegated dudleya	CoScr	None	None	1B	Covered NE
<i>Dudleya viscida</i>	sticky dudleya	Chprl, CoScr (steep north facing slopes)	None	None	4	Covered
<i>Euphorbia misera</i>	cliff spurge	CoScr	None	None	2	Not covered
<i>Ferocactus viridescens</i>	San Diego barrel cactus	Chprl, CoScr	FSC	None	2	Covered
<i>Fritillaria biflora</i> var. <i>biflora</i>	chocolate lily	Chprl, CoScr, VFGrs/clay	None	None	Unlisted	Not covered
<i>Githopsis diffusa</i> ssp. <i>filicaulis</i>	mission canyon blue-cup	Chprl (openings)	None	None	3	Not covered
<i>Harpagonella palmeri</i>	Palmer's grappling hook	Chprl, CoScr, VFGrs/clay	None	None	4	Not covered
<i>Hazardia orcuttii</i>	Orcutt's hazardia	Chprl	None	Candidate	1B	Not covered
<i>Holocarpha virgata</i>	graceful tarplant	VFGrs	None	None	4	Not covered
<i>Horkelia truncata</i>	Ramona horkelia	Chprl, CmWld/clay	None	None	1B	Not covered
<i>Isocoma menzeisii</i> var. <i>decumbens</i>	decumbent goldenbush	CoScrs	None	None	1b	Not covered
<i>Lepechinia cardiophylla</i>	Gander's pitcher sage	Chprl	None	None	1B	Covered
<i>Machaeranthera juncea</i>	rush-like bristleweed	Chprl, CoScr	None	None	4	Not covered
<i>Microseris douglasii</i>	small-flowered microseris	VFGrs (clay)	None	None	4	Not Covered
<i>Monardella hypoleuca</i> ssp. <i>lanata</i>	felt-leaved monardella	Chprl	None	None	1B	Covered
<i>Muilla clevelandii</i>	San Diego goldenstar	Chprl, CoScr (openings)	None	None	1B	Covered

Scientific Name	Common Name	Habitat	Federal Status	California Status	CNPS List	MSCP Covered
<i>Nolina interrata</i>	Dehesa bear-grass	Chprl	None	SE	1B	Covered
<i>Opuntia californica</i> var. <i>californica</i>	snake cholla	CoScr	None	None	1B	Covered NE
<i>Phacelia stellaris</i>	Brand's phacelia	CoScr, Dunes	None	None	1B	Not Covered
<i>Pinus torreyana</i>	Torrey pine	Coniferous Forest	None	None	1B	Covered
<i>Polygala cornuta</i> ssp. <i>fishiae</i>	Fish's milkwort	Chprl, CmWld, RpWld	None	None	4	Not covered
<i>Quercus dumosa</i>	Nuttall's scrub oak	Chprl	None	None	1B	Not covered
<i>Quercus engelmanni</i>	Engelmann oak	Chprl, CmWld, RpWld, VFGrs	None	None	4	Not covered
<i>Rosa minutiflora</i>	small-leaved rose	CoScr, Chprl	None	SE	2	Covered
<i>Satureja chandleri</i>	San Miguel savory	Chprl	None	None	1B	Covered
<i>Senecio ganderi</i>	Gander's butterweed	Chprl	None	SR	1B	Covered
<i>Solanum tenuilobatum</i>	narrow-leaved nightshade	Chprl	None	None	None	Covered
<i>Viguiera laciniata</i>	San Diego County viguiera	CoScr	None	None	4	Not covered

Source: Merkel & Associates, 2002

Sensitive Fauna

Table 3.3-3 summarizes the sensitive fauna species that could be affected by the proposed work. Sensitive animals include those listed by USFWS (1999) and CDFG (2002). The following abbreviations are used in the table: FE = Federally Endangered, FT = Federally Threatened, FSC = Federal Species of Special Concern, SE = State Endangered, SR = State Rare, ; habitat codes are synonymous to those used in the California Native Plant Society's Inventory of Rare and Endangered Vascular Plants of California (Skinner and Pavlik 1994), including CCFrs = closed-cone conifer forest, Chprl = chaparral, CoScr = coastal scrub, CmWld = cismontane woodland, MshSw = marshes and swamps, Medws = meadows and seeps, RpWld = riparian woodland, and VFGrs = valley and foothill grassland.

Scientific Name	Common Name	Habitat	Federal Status	California Status	MSCP Covered
<i>Euphydryas editha quino</i>	Quino checkerspot butterfly	Open grassland and openings within shrub habitats that support Dwarf Plantain (<i>Plantago erecta</i>)	FE	SA	None
<i>Lycaena hermes</i>	Hermes copper	Openings in chaparral, associated with the larval host plant Spiny Redberry (<i>Rhamnus crocea</i>), adults feed on nectar from Flat-top Buckwheat	FSC	SA	None
<i>Danaus plexippus</i>	monarch butterfly	Migratory concentrations found on trees	None	None	None
<i>Bufo californicus</i>	southwestern arroyo toad	Shallow pools, open sand, and gravel flood terraces of intermittent to perennial streams; may also occupy adjacent upland communities within 1.2 km	FE	CSC, Protected	Covered
<i>Scaphiopus hammondii</i>	western spadefoot toad	Prefers sandy or gravelly soil in grasslands, sage scrub, open chaparral, and pine-oak woodlands; grasslands with shallow temporary pools are optimal	FSC	CSC, Protected	None
<i>Phrynosoma coronatum blainvillii</i>	San Diego horned lizard	Chaparral, sage scrub, oak woodlands, and grasslands; sometimes occurs along seldom used dirt paths where native ant species are prevalent	FSC	CSC, Protected	Covered
<i>Eumeces skiltonianus interparietalis</i>	Coronado skink	Variety of habitats including grasslands, sage scrub, and various woodlands including oak, pine, juniper, and riparian	FSC	CSC	None
<i>Cnemidophorus hyperythrus</i>	orangethroat whiptail	Sage scrub (and chaparral), prefers sandy areas with patches of brush and rocks; may be associated with buckwheat and Black Sage	FSC	CSC, Protected	Covered
<i>Anniela pulchra pulchra</i>	silvery legless lizard	Shows a preference for leaf litter and sandy substrates	FSC	CSC	Not covered
<i>Cnemidophorus tigris multiscutatus</i>	coastal western whiptail	Coastal sage scrub, chaparral, and grasslands	FSC	SA	None
<i>Salvadora hexalepis virgultea</i>	coast patch-nosed snake	Chaparral and sage scrub; may require mammal burrows or woodrat nests for overwintering	FSC	CSC, Protected	None
<i>Diadophis punctatus similis</i>	San Diego ringneck snake	Chaparral, forest, and grasslands	None	SA	None
<i>Lichanura trivirgata roseofusca</i>	coastal rosy boa	Rocky outcrop areas within chaparral and sage scrub	FSC	SA	None
<i>Crotalus ruber ruber</i>	northern red diamond rattlesnake	Occupies rocky outcrops and areas of heavy brush or rugged terrain in chaparral, sage scrub, or desert scrub on both coastal and desert slopes, usually below 4000 feet	FSC	CSC	None
<i>Cathartes aura</i>	turkey vulture	Open habitats with protected large trees and snags	FSC	CSC	None

Scientific Name	Common Name	Habitat	Federal Status	California Status	MSCP Covered
<i>Elanus leucurus</i>	white-tailed kite	Grasslands, agricultural fields, and open habitats with areas of dense deciduous trees for nesting	None	SA, Fully Protected	None
<i>Aquila chrysaetos</i>	golden eagle	Nests in cliffs (or trees), found in generally mountainous or hilly terrain	None	CSC, Fully Protected	Covered
<i>Falco peregrinus anatum</i>	American peregrine falcon	Forages near coast	FE	CE	Covered
<i>Accipiter striatus</i>	sharp-shinned hawk	Mixed woodlands near open areas, prefers but not restricted to riparian habitats	None	CSC	None
<i>Circus cyaneus</i>	northern harrier	Forages over marsh and open terrain	None	CSC	Covered
<i>Buteo regalis</i>	ferruginous hawk	Dry, open terrain	FSC	CSC	Covered
<i>Lanius ludovicianus</i>	loggerhead shrike	Found within grassland or open habitats with bare ground and sparse shrub and/or tree cover for nesting and perching	FSC	CSC	None
<i>Eremophila alpestris actia</i>	California horned lark	Grasslands, disturbed areas and open habitats with sparse, low vegetation	None	CSC	None
<i>Speotyto cunicularia hypugaea</i>	burrowing owl	Hunts open terrain generally with burrow at a slight elevational rise	None	CSC	Covered
<i>Polioptila californica californica</i>	California gnatcatcher	Various successional stages of sage scrub	FT	CSC	Covered
<i>Sialia mexicana</i>	western bluebird	Open woodlands, farmlands, and orchards	None	None	Covered
<i>Campylorhynchus brunneicapillus cousei</i>	coastal cactus wren	Areas of sage scrub with robust stands of prickly pear and cholla	None	CSC	Covered
<i>Aimophila ruficeps canescens</i>	Southern California rufous-crowned sparrow	Rocky hillsides supporting sparse, low scrub or chaparral, sometimes mixed with grasses	FSC	CSC	Covered
<i>Amphispiza belli belli</i>	Bell's sage sparrow	Chaparral and dense sage scrub	FSC	CSC	None
<i>Ammodramus savannarum</i>	grasshopper sparrow	Grasslands and pastures	None	SA	None
<i>Felis concolor</i>	mountain lion	Found in areas of extensive dense native vegetation	None	Calif. Regulated	Covered
<i>Odocoileus hemionus fuliginata</i>	southern mule deer	Found in areas of extensive dense native vegetation	None	Calif. Regulated	Covered
<i>Taxidea taxus</i>	American badger	Found in open grasslands on periphery of native vegetation	None	None	Covered
<i>Lepus californicus bennettii</i>	San Diego black-tailed jackrabbit	Relatively open chaparral and sage scrub and grasslands	FSC	CSC	None
<i>Perognathus longimembris pacificus</i>	Dulzura California pocket mouse	Found in areas of fine sandy ground, (Coastal sage scrub)	FSC	CSC	None

Scientific Name	Common Name	Habitat	Federal Status	California Status	MSCP Covered
<i>Chaetodipus fallax fallax</i>	northwestern San Diego pocket mouse	Found in Coastal sage scrub	FSC	CSC	None
<i>Neotoma lepida intermedia</i>	San Diego desert woodrat	Chaparral, particularly abundant in areas of rock outcrops	FSC	CSC	None
<i>Myotis yumanensis</i>	Yuma myotis	Uses multiple habitats (primarily woodlands and forests) but forages over water	FSC	CSC	None
<i>Myotis evotis</i>	long-eared myotis	Uses multiple habitats for roosting (mainly crevices), forages in oak/coniferous forests, and may require water. As with many bat species in the region, little information is available on microhabitat use	FSC	None	None
<i>Myotis thysanodes</i>	fringed myotis	Uses multiple habitats for roosting (mainly crevices), feeds in coniferous forests	FSC	None	None
<i>Myotis volans</i>	long-legged myotis	Uses multiple habitats for roosting (mainly crevices), feeds in coniferous forests	FSC	None	None
<i>Myotis ciliolabrum</i>	small-footed myotis	Uses a variety of habitats, prefers open stands in forests/woodlands, brushy habitats, and riparian areas	FSC	None	None
<i>Euderma maculatum</i>	spotted bat	Roosts in high rocky cliffs, forages in riparian and edge habitats	FSC	CSC	None
<i>Corynorhinus townsendii</i>	Townsend's big-eared bat	Cave rooster, feeds in forest/woodland habitats or along habitat edges within 15 km of roost site	FSC	CSC	None
<i>Antrozous pallidus</i>	pallid bat	Uses open forest and grassland habitats for feeding and multiple habitats for roosting	None	CSC	None
<i>Nyctinomops femorosaccus</i>	pocketed free-tailed bat	Cliff rooster, feeds in multiple habitats	None	CSC	None
<i>Nyctinomops macrotis</i>	big free-tailed bat	Cliff rooster, prefers rugged, rocky canyons, feeds in multiple habitats including over water	None	CSC	None
<i>Eumops perotis</i>	western mastiff bat (see California mastiff bat in text)	Extensive open areas with abundant roost locations in rock outcrops, (found where oaks and chaparral occur)	FSC	CSC	None

Source: Merkel & Associates, *Biological Resources Report*, City of San Diego Canyon Sewer Program Environmental Impact Report (PEIR), 2003

Wildlife Corridors

A wildlife corridor is considered to represent linear landscape features that allow animal movement between two patches of more substantial habitat. A corridor is not expected to provide sufficient space and resources to meet all of the life history needs of its target species.

Depending upon the species considered, corridors function in a variety of ways and may function differently over the course of a year. For the purposes of general discussion, wildlife corridors can be broken down into three categories: regional corridors, local corridors, and short corridors.

Regional Corridors accommodate the needs of a broad suite of animals. Such corridors are especially important to dispersing individuals (i.e., juveniles) that use these corridors to find unoccupied ranges and mates. This effectively links otherwise distinct populations of animals and serves to maintain genetic diversity. In regional planning, attention often focuses on large, wide-ranging “umbrella” species. Under this concept, if a preserve plan can accommodate the needs of wide-ranging species, it will allow sufficient connectivity to meet the lesser needs of other species.

A typical width of greater than 1,000 feet is recommended for regional corridors serving large mammals (Ogden 1992). Constricted sections of the corridor should have maximum lengths of less than 500 feet and minimum widths of 400 feet. Where possible, canyon corridors should extend from rim to rim (Ogden 1992, 1998). For planning purposes, widths of a 2:1 proportion (length to width) are generally considered to be necessary for wildlife corridors on an average basis to provide essential buffering of wildlife activities. Narrower or wider corridors may also function depending upon the particular physiography, adjacent land uses, and corridor lengths. Spencer and Mock (1997) noted the value of transmission easements as potential contributors to meeting corridor needs in urbanized environments. Where corridors are narrow and already tenuous, special management measures are required including implementing measures to control runoff, noise, lighting, exotic predators and invasive plants. Such measures have been adopted as the Multi-Habitat Planning Area (MHPA) Land Use Adjacency Guidelines.

Local corridors are much shorter than regional corridors and permit movement between discreet vegetation patches, thereby forming “habitat linkages.” These corridors allow two or more small connected patches of habitat to function as a larger block of habitat. The larger interconnected block enables viability and promotes population stability through regular genetic interchange, even though each individual habitat patch may be too small for the long-term survival of a wildlife population. To serve effectively as wildlife corridors, habitat linkages must permit unobstructed movement of the species. This becomes an important consideration with respect to connectivity between preserve areas, particularly where additional urban development is to occur on a limited basis. Depending upon the particular parameters of the linkage, connectivity may also be made by utility corridors and recreational trail facilities. Local corridors are generally considered to require widths of 400 to 600 feet to function for wildlife movement, depending upon the corridor lengths, species using the corridor, cover, topography, as well as adjacent land uses (Ogden 1998).

Short corridors function like their larger counterparts, but typically serve the daily needs of individuals. These corridors allow animals to move through unsuitable habitat to access bedding sites, watering sites, and foraging areas. Because of their frequent and regular use, such areas of concentrated wildlife movement are often referred to as “travel routes.”

Wetlands

The definition of wetlands in the City's ESL Regulation is intended to differentiate uplands (terrestrial areas) from wetlands, and furthermore to differentiate naturally occurring wetland areas from those created by human activities. Except for areas created for the purposes of wetland habitat or resulting from human actions to create open waters or from the alteration of natural stream courses, it is not the intent of the City to regulate artificially created wetlands in historically non-wetland areas unless they have been delineated as wetlands by the Army Corps of Engineers, and/or the California Department of Fish and Game (CDFG). For the purposes of the ESL, artificially created lakes such as Lake Hodges, artificially channeled floodways such as the Carmel Valley Restoration and Enhancement Project (CVREP) and previously dredged tidal areas such as Mission Bay should be considered wetlands under the ESL regulations. The following provides guidance for defining wetlands regulated by the City of San Diego under the Land Development Code.

Naturally occurring wetland vegetation communities are typically characteristic of wetland areas. Examples of wetland vegetation communities include saltmarsh, brackish marsh, freshwater marsh, riparian forest, oak riparian forest, riparian woodland, riparian scrub and vernal pools. Common to all wetland vegetation communities is the predominance of hydrophytic plant species (plants adapted for life in anaerobic soils). Many references are available to help identify and classify wetland vegetation communities; Holland (1986), Cowardin et al. (1979), Keeler-Wolf and Sawyer (1996), and Zedler (1987). The United States Army Corps of Engineers (ACOE) Wetland Delineation Manual (1987) provides technical information on hydrophytic species.

Problem areas can occur when delineating wetlands due to previous human activities or naturally occurring events. Areas lacking naturally occurring wetland vegetation communities are still considered wetlands if hydric soil or wetland hydrology is present and past human activities have occurred to remove the historic vegetation (e.g., agricultural grading in floodways, dirt roads bisecting vernal pools, channelized streambeds), or catastrophic or recurring natural events preclude the establishment of wetland vegetation (e.g., areas of scour within streambeds, coastal mudflats and salt pannes that are unvegetated due to tidal duration). The ACOE Wetland Delineation Manual (1987) provides technical information on hydric soils and wetland hydrology.

Seasonal drainage patterns that are sufficient enough to etch the landscape (i.e., ephemeral/intermittent drainages) may not be sufficient enough to support wetland dependent vegetation. These types of drainages would not satisfy the City's wetland definition unless wetland dependent vegetation is either present in the drainage or lacking due to past human activities. Seasonal drainage patterns may constitute "waters of the United States" which are regulated by the ACOE and/or the CDFG.

Areas lacking wetland vegetation communities, hydric soils and wetland hydrology due to non-permitted filling of previously existing wetlands will be considered a wetland under the ESL and regulated accordingly. The removal of the fill and restoration of the wetland may be required as a condition of project approval.

Areas that contain wetland vegetation, soils or hydrology created by human activities in historically non-wetland areas do not qualify as wetlands under this definition unless they have been delineated as wetlands by the ACOE, and/or the CDFG. Artificially created wetlands consist of the following: wetland vegetation growing in brow ditches and similar drainage structures outside of natural drainage courses, wastewater treatment ponds, stock watering, desiltation and retention basins, water ponding on landfill surfaces, road ruts created by vehicles and artificially irrigated areas which would revert to uplands if the irrigation ceased. Areas of historic wetlands can be assessed using historic aerial photographs, existing environmental reports (EIRs, biology surveys, etc.), and other collateral material such as soil surveys.

Some coastal wetlands, vernal pools and riparian areas have been previously mapped. The maps, labeled C-713 and C-740 are available to aid in the identification of wetlands. Additionally, the 1":2000' scale MSCP vegetation maps may also be used as a general reference, as well as the USFWS National Wetlands Inventory maps. These maps, located at the Development Services Department, should not replace site-specific field mapping.

3.3.2 Thresholds of Significance

A significant impact could occur if implementation of the General Plan:

- ~~▪Results in the reduction in the number of any unique, rare, endangered, sensitive, or fully protected species of plants or animals.~~
 - ~~▪Results in significant impacts to important habitat or result in interference with the movements of resident or migratory fish or wildlife species.~~
 - ~~▪Affects the long-term conservation of biological resources by allowing encroachment by urban development into any defined comprehensive resource planning area (e.g., MHPA).~~
 - ~~▪Results 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.~~
 - ~~▪Results in a conflict with any local policies or ordinances protecting biological resources.~~
 - ~~▪Results in noise impacts on sensitive species.~~
1. A substantial adverse impact, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in the MSCP or other local or regional plans, policies or regulations, or by the California Department of Fish and Game (CDFG) or U.S. Fish and Wildlife Service (USFWS)?
 2. A substantial adverse impact on any Tier I Habitats, Tier II Habitats, Tier IIIA Habitats, or Tier IIIB Habitats as identified in the Biology Guidelines of the Land Development manual or other sensitive natural community identified in local or regional plans, policies, regulations, or by the CDFG or USFWS?

3. A substantial adverse impact on wetlands (including, but not limited to, marsh, vernal pool, riparian, etc.) through direct removal, filling, hydrological interruption, or other means?
4. Interfering substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, including linkages identified in the MSCP Plan, or impede the use of native wildlife nursery sites?
5. A conflict with the provisions of an adopted Habitat Conservation Plan, Natural Conservation Community Plan, or other approved local, regional, or state habitat conservation plan, either within the MSCP plan area or in the surrounding region?
6. Introducing land use within an area adjacent to the MHPA that would result in adverse edge effects?
7. A conflict with any local policies or ordinances protecting biological resources?
8. An introduction of invasive species of plants into a natural open space area?

3.3.3 Impact Analysis

The proposed Draft General Plan would result in infill and redevelopment of areas with existing development; the proposal is expected to intensify or change the land use mix in developed areas that meet village locational criteria. The proposed resultant intensification within selected urbanized areas may lessen development pressures on dwindling vacant and/or sensitive areas. The proposal is expected to initially affect older urban and suburban areas where redevelopment is more desirable and/or feasible. Over time, as additional developed areas of the City age and become suitable for redevelopment, the proposal would influence newer suburban and master planned communities.

The proposed Project would also guide the development of remaining developable vacant land. Areas that meet village location criteria would be expected to develop as mixed use, compact villages. In addition, the proposal was designed to avoid adjacency concerns with the City's planned habitat preserve, the MHPA (**Figure 3.3-2**).

No specific projects or actions have been identified with this proposal that would result in any direct or indirect physical change in the environment. However, future growth is anticipated and may occur on undeveloped land which may result in impacts to biological resources. Therefore, for the purposes of this impact analysis, it is assumed impacts to biological resources may occur with future actions, such as community plan updates or amendments or individual project development proposals, and potential mitigation measures consistent with the City's Biology Guidelines, MSCP and ESL have been identified under **Table 3.3-4**.

Future environmental analysis would be required for any discretionary actions needed to implement the Draft General Plan. As discussed above, such proposals may result in significant impacts to biological resources and, as such, would require identification of project-specific mitigation measures at that time consistent with the City's Biology Guidelines and MSCP and ESL Regulations.

Could implementation of the Draft General Plan result in the reduction in the number of any unique, rare, endangered, sensitive, or fully protected species of plants or animals?

By focusing on compact, more environmentally sensitive development patterns, impacts to native habitat and wildlife, and habitat fragmentation and isolation within the San Diego region would generally be less than without implementation of the Draft General Plan. Fewer impacts to native habitat and wildlife would aid in the maintenance of fish and wildlife populations, and assist in maintaining the number or range of rare or endangered plants or animals.

The following are policies that have been identified within the proposed Conservation Element would be consistent with the overarching MSCP goal to maintain and enhance biological diversity in the region and conserve viable populations of endangered, threatened, and key sensitive species and their habitats, while enabling economic growth in the region:

- Pursue funding for the acquisition and management of the MHPA and other important community open space lands.
- Support the preservation of rural lands and open spaces throughout the region.
- Protect community urban canyons and other important open spaces that have been designated in community plans for the many conservation benefits they offer locally, and regionally as part of a collective citywide open space system.
- Minimize or avoid impact to canyons and other ESL, by relocating sewer infrastructure out of these areas where possible, minimizing construction of new sewer access roads into these areas, and redirection of sewage discharge away from canyons and other ESL.
- Encourage the removal of invasive plant species and the planting of native plants near open space preserves.
- Pursue formal dedication of existing and future open space areas throughout the City especially in core biological resource areas of the City's adopted MSCP Subarea Plan.
- Require sensitive design, construction, relocation, and maintenance of trails to optimize public access and resource conservation.
- Apply the appropriate zoning and ESL regulations to limit development of floodplains, sensitive biological areas including wetlands, steep hillsides, canyons and coastal lands.
- Manage watersheds and regulate floodplains to reduce disruption of natural systems, including the flow of sand to the beaches.

- Limit grading and alternations of steep hillsides, cliffs and shoreline to minimize erosion and landform impacts.
- Limit and control runoff, sedimentation, and erosion both during and after construction activity.

The proposed policies of the Draft General Plan represent a shift in focus from development of vacant land to directing growth primarily toward village centers in order to preserve established residential neighborhoods and manage the City's growth over the long term. Additionally, development would be targeted for areas outside the MHPA and conservation priority would be given towards areas within the MHPA. Development up to 25 percent of the total parcel acreage is allowed within the City's MHPA. However, development which proposes over 25 percent encroachment into the MHPA must propose a MHPA boundary line adjustment where lands of equal or greater habitat value are added to the MHPA. The proposed boundary line adjustment must be approved by City MSCP, CDFG, and USFWS.

Future growth would still occur, and in some cases, development would occur on vacant land which may result in significant impacts to biological resources. Although this impact is expected to be less than if the Draft General Plan was not adopted, it would nevertheless still be significant, because future impacts to native habitat could result in a reduction of the number or restrict the range of a rare or endangered plant or animal. Future environmental analysis would be required for any discretionary actions needed to implement the General Plan Update (such as community plan updates or amendments or individual project development proposals).

Mitigation measures, ~~Bio-1 through Bio-9~~ listed below which are consistent with the City's Biology Guidelines, MSCP and ESL would be applied to all future projects, as appropriate. Since no specific projects have been identified, it is infeasible at this time to provide mitigation to a level that would result in no net loss of endangered or threatened species. Therefore, these impacts are considered to be significant and unavoidable at this program level of review.

Could implementation of the Draft General Plan result in significant impacts to important habitat or result in interference with the movements of resident or migratory fish or wildlife species?

By focusing on compact, more environmentally sensitive development patterns, impacts to native habitat and wildlife, habitat fragmentation and isolation would be reduced. These impacts would be further reduced if future development is directed towards urban infill and redevelopment consistent with the proposed policies and goals of the Draft General Plan. However, future growth would still occur, and in some cases, development would occur on vacant land which may result in significant impacts to biological resources.

On March 18, 1997, the San Diego City Council unanimously adopted the MSCP (R-28455) and in July 1997 entered into a 50-year MSCP Implementing Agreement with the U.S. Fish and Wildlife Service (USFWS) and the California Department of Fish and Game (CDFG). Through this agreement, the City received its federal Endangered Species Act section 10(a) incidental take permit (PRT-830421) on July 18, 1997.

Pursuant to its MSCP permit, the City of San Diego has incidental “take” authority over 85 rare, threatened and endangered species. This means that the City may incidentally impact these species without additional state or federal approval or permits. This “take” authority is used by City departments for public projects and is also conferred to third parties (e.g., private developers) who receive City of San Diego development permits. Because “take” authority is granted locally, City and private development projects are spared the significant time and financial costs of state and federal wildlife agency permitting processes. In order to receive its MSCP take authority, the City agreed to carry out the obligations outlined in its Implementing Agreement. The City’s primary MSCP obligations are:

- Preserve 52,012 acres within the City’s MSCP planning area (total acreage was increased to 52,727 acres per R-300799 in conjunction with the City’s brush management ordinance changes adopted on September 6, 2005);
- Ensure development project compliance with all City of San Diego MSCP implementing regulations (e.g., City of San Diego MSCP Subarea Plan, Environmentally Sensitive Lands Ordinance, Biology Guidelines, etc.);
- Annual reporting of habitat gains and losses to wildlife agencies;
- All rare plant, animal, habitat, and wildlife corridor biological monitoring as outlined in the 1996 *Biological Monitoring Plan for the Multiple Species Conservation Program* (1996);
- Biological monitoring results reporting to wildlife agencies on an annual basis;
- Preparation of area-specific management plans for lands preserved under the program; and
- Management of all lands preserved under the MSCP.
- Preparation and implementation of Area Specific Management Directives (ASMDs)
- Ensure development project compliance of specific conditions listed contained in Table 3-5 of the MSCP Subarea Plan .
- Management of lands conserved under the MSCP in accordance with the MSCP Subarea Plan and Implementing Agreement (IA).

Wildlife corridors have been identified as part of the regional planning effort for the MSCP. Future environmental analysis would be required for any discretionary actions needed to implement the Draft General Plan (such as community plan updates or amendments or individual project development proposals). Any identified impacts to wildlife movement could potentially be reduced to below a level of significance through the incorporation of mitigation measure Bio-3, which include features such as bridges and large culverts in order to minimize effects to wildlife movements. Additionally, because provisions in the MSCP Plan (**see Land Use discussion, 3.8**) requires that any modifications to the MHPA result in an overall benefit to the natural resources, it is anticipated that regional wildlife movement would be adequately protected. Since no specific projects have been identified, it is infeasible at this time to provide mitigation to a level that would result in impacts to below a level of significance. Therefore, these impacts are considered to be significant and unavoidable at this time.

Could implementation of the Draft General Plan affect the long-term conservation of biological resources by allowing encroachment by urban development into any defined comprehensive resource planning area (e.g., MHPA)?

The proposed Conservation Element of the General Plan Update contains policies to guide the conservation of resources that are consistent with existing environmental regulations, goals, and policies that address habitat, wildlife, natural open space, and natural drainages. These proposed policies would be consistent with the overarching MSCP goal to maintain and enhance biological diversity in the region and conserve viable populations of endangered, threatened, and key sensitive species and their habitats, while enabling economic growth in the region (**see Land Use discussion, section 3.8**). The proposal would also be consistent with the MHPA Land Use Adjacency Guidelines for drainage, toxics, lighting, noise, barriers, invasives and brush management, as identified in the MSCP Subarea Plan.

The City's MSCP designates areas suitable for development and areas proposed for conservation (MHPA). In the event that future growth is proposed within the MHPA, the MSCP Plan contains a provision that requires additional lands be added to the MHPA that have an equal or better biological value than those lands removed for development. Any modification to the adopted subarea plan would be subject to oversight by the USFWS, and CDFG, and would require environmental review and public comment pursuant to the California Environmental Quality Act (CEQA). Because existing provisions in the MSCP Plan require that any modifications to the plan result in equal or better biological values, the proposed Draft General Plan is not anticipated to result in any significant direct or indirect impacts on any environmental or habitat conservation plans.

Adoption of the proposed General Plan Update is not anticipated to have a significant impact on any defined comprehensive resource planning areas because the proposed goals and policies have been established to reduce impacts on sensitive biological resources and to be consistent with the City's MSCP and ESL ordinance. Additionally, any discretionary actions needed to implement the Draft General Plan) would be required to implement mitigation measure Bio-4 which would ensure consistency with the MHPA Land Use Adjacency Guidelines. Therefore, the proposed General Plan Update would not adversely affect the viability of any long-term conservation plans (e.g., MSCP).

Could implementation of the Draft General Plan 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?

The ESL regulations require that impacts to wetlands be avoided. Unavoidable impacts should be minimized to the maximum extent practicable, and mitigated as follows:

As part of the project-specific environmental review pursuant to CEQA, all unavoidable wetlands impacts (both temporary and permanent) would need to be analyzed and mitigation would be required in accordance with **Table 3.3-4** of the Biology Guidelines; mitigation must be based on the impacted type of wetland habitat. Mitigation must prevent any net loss of wetland functions and values of the impacted wetland.

The following provides operational definitions of the four types of activities that constitute wetland mitigation under the ESL regulations:

Wetland creation is an activity that results in the formation of new wetlands in an upland area. An example is excavation of uplands adjacent to existing wetlands and the establishment of native wetland vegetation.

Wetland restoration is an activity that re-establishes the habitat functions of a former wetland. An example is the excavation of agricultural fill from historic wetlands and the re-establishment of native wetland vegetation.

Wetland enhancement is an activity that improves the self-sustaining habitat functions of an existing wetland. An example is removal of exotic species from existing riparian habitat.

Wetland acquisition is an activity resulting in wetland habitat that being bought or obtained through the purchase of off-site credits.

Wetland enhancement and wetland acquisition focus on the preservation or the improvement of existing wetland habitat and function, and do not result in an increase in wetland area; therefore, a net loss of wetland may result. As such, acquisition and/or enhancement of existing wetlands may be considered as partial mitigation only, for any balance of the remaining mitigation requirement after restoration or creation if wetland acreage is provided at a minimum of a 1:1 ratio. For permanent wetland impacts that are unavoidable and minimized to the maximum extent feasible, mitigation must consist of creation of new, in-kind habitat to the fullest extent possible and at the appropriate ratios. In addition, unavoidable impacts to wetlands located within the Coastal Overlay Zone must be mitigated on-site, if feasible. If on-site mitigation is not feasible, then at least a portion of the mitigation must occur within the same watershed. All mitigation for unavoidable wetland impacts within the Coastal Overlay Zone must occur within the Coastal Overlay Zone.

The MSCP Subarea Plans have policies protecting wetland habitat, although it is not the primary purpose of the subarea plans to provide a regional approach to the protection of wetlands. Additionally, many wetlands are regulated by the following agencies: ACOE, CDFG, and the California Coastal Commission. For the wetland sites under the jurisdiction of these agencies, these agencies have policies encouraging or mandating avoidance and minimization of impacts. If impacts do occur, no net loss of wetland functions or values would generally be permitted. This, in practice, often results in more wetlands created and/or restored than are impacted. Unavoidable significant impacts may occur to wetland habitats due to future development; however, federal, state and local agencies would require mitigation measures to ensure there is no net loss of wetland habitat. However, some aquatic resources are not protected by existing regulations.

Since no specific projects have been identified, it is infeasible at this time to provide mitigation to a level that would result in no net loss of wetland habitat. Therefore, these impacts are considered to be significant and unavoidable at this time.

Could implementation of the Draft General Plan result in a conflict with any local policies or ordinances protecting biological resources?

The MSCP is a conservation program designed to facilitate the implementation of a regional habitat preserve by coordinating project impacts and mitigation while allowing the issuance of “take” permits for sensitive upland species at the local level (City of San Diego 1997). This habitat preserve is known as the MHPA and lands within it have been designated for conservation. Various jurisdictions, including the City of San Diego, have developed MSCP Subarea plans to establish guidelines for the implementation of their respective preserve areas which are included in the regional MHPA.

In addition to general guidelines and directives provided in the City’s MSCP Subarea Plan, development in the City of San Diego is subject to restrictions discussed in the Land Development Code Biology Guidelines (2002) and the ESL ordinance. As discussed above under Threshold 1 and in the **Land Use section (3.8)**, the goals and policies of the Draft General Plan would be consistent with the MSCP, ESL, and the City’s Biology Guidelines. Therefore, no significant impacts would result with adoption of the proposed Draft General Plan.

Could the revised Land Use Compatibility Chart proposed by the General Plan Update result in noise impacts to sensitive species?

No specific projects or actions have been identified with this proposal that would result in any direct or indirect physical change in the environment. However, future growth is anticipated and may occur on undeveloped land which may result in impacts to biological resources. Future environmental analysis would be required for any discretionary actions needed to implement the General Plan Update (such as community plan updates or amendments or individual project development proposals).

The increase in intensity of development can result in increased noise levels in certain areas. Additionally, increased noise from construction, roadway traffic or transit will also result in an increase in ambient noise. An increase in levels of noise has the potential to affect behavioral and physiological responses in noise-sensitive wildlife receptors. Adverse responses to increased noise may include hearing loss or the temporary masking of vocalizations commonly used during the breeding season, nest abandonment, and decrease in predator awareness, thereby resulting in a decrease in reproductive and overall fitness of certain animal species. Birds are considered to be the most noise-sensitive group of wildlife species in terrestrial ecosystems.

In accordance with the MSCP, uses in or adjacent to the MHPA should be designed to minimize noise impacts. Berms or walls should be constructed adjacent to commercial areas, recreational areas and any other use that may introduce noises that could impact or interfere with wildlife utilization of the MHPA. Potential noise mitigation measures consistent with the City’s Biology Guidelines, MSCP and ESL have been identified under **Table 3.3.4**, in **Section 3.3.6**. All future projects (such as community plan updates or amendments or individual project development proposals) associated with the Draft General Plan would incorporate these mitigation measures, therefore, no significant, unmitigated impacts are anticipated to occur with adoption of the Draft General Plan.

3.3.4 Mitigation Framework

The following measures are currently applied to projects that impact biological resources.

As each future project is reviewed under CEQA, additional specificity may be required with respect to mitigation measures identified below. **These measures may be updated periodically in response to changes in federal and state laws, and new/improved scientific methods.**

- Development Projects shall be designed to minimize or eliminate impacts to natural habitats and known sensitive resources consistent with the City's Biology Guidelines, MSCP Subarea Plan, and the ESL ordinance.
- Biological mitigation for upland impacts shall be in accordance with the City's Biology Guidelines, **Table 3.3.4** as illustrated below. Prior to the commencement of any construction related activity on-site (including earthwork and fencing) and/or the preconstruction meeting, mitigation for direct impacts to Tier I, Tier II, Tier IIIA, and Tier IIIB shall be assured to the satisfaction of the Development Services Department Environmental Review Manager (ERM) through preservation of upland habitats in conformance with the City's Biology Guidelines, MSCP, and ESL Regulations. Mitigation for upland habitats may include on-site preservation, on-site enhancement/restoration; payment into the Habitat Acquisition Fund; acquisition/dedication of habitat inside or outside the MHPA; or other mitigation as approved by the ERM, MSCP staff and the Park and Recreation, as described below. Any restoration plans are subject to review by the City's EAS, Parks and Recreation and MSCP staff prior to issuance of any grading permits. These entities also must sign off on final acceptance of the mitigation project as successful.
- Development projects shall provide for continued wildlife movement through wildlife corridors as identified in the MSCP Subarea Plan or as identified through project-level analysis. Mitigation may include, but is not limited to, provision of appropriately-sized bridges, culverts, or other openings to allow wildlife movement.

TIER	HABITAT TYPE	MITIGATION RATIOS			
TIER 1 (rare uplands)	Southern Foredunes Torrey Pines Forest Coastal Bluff Scrub Maritime Succulent Scrub Maritime Chaparral Scrub Oak Chaparral Native Grassland Oak Woodlands	Location of Preservation			
				Inside	Outside
		Location of Impact	Inside*	2:1	3:1
		Outside	1:1	2:1	
TIER II (uncommon uplands)	Coastal Sage Scrub (CSS) CSS/Chaparral	Location of Preservation			
				Inside	Outside
		Location of Impact	Inside*	1:1	2:1
		Outside	1:1	1.5:1	
TIER III A: (common uplands)	Mixed Chaparral Chamise Chaparral	Location of Preservation			
				Inside	Outside
		Location of Impact	Inside*	2 + <u>1:1</u>	3 + <u>1.5:1</u>
		Outside	4 + <u>0.5:1</u>	2 + <u>1:1</u>	
TIER III B: (common uplands)	Non-Native Grasslands	Location of Preservation			
				Inside	Outside
		Location of Impact	Inside*	1:1	1.5:1
		Outside	0.5:1	1:1	
TIER IV: (other uplands)	Disturbed Land Agriculture Eucalyptus Woodland Ornamental Plantings	Location of Preservation			
				Inside	Outside
		Location of Impact	Inside*	0:1	0:1
		Outside	0:1	0:1	

Notes:

1. For all Tier I impacts, the mitigation could (1) occur within the MHPA portion of Tier I (in Tier) or (2) occur outside of the MHPA within the affected habitat type (in-kind)
 2. For impacts to Tier II, III A and III B habitats, the mitigation could (1) occur within the MHPA portion of Tiers I – III (out-of-kind) or (2) occur outside of the MHPA within the affected habitat type (in-kind).
- * No mitigation would be required for impacts within the base development area (25%) occurring inside the MHPA. Mitigation for any impacts from development in excess of the 25% base development area for community plan public facilities or for projects processed through the deviation process would be required at the indicated ratios.

- For all projects adjacent to the MHPA, the development shall conform to all applicable MHPA Land Use Adjacency Guidelines (Section 1.4.3) of the MSCP Subarea Plan. In particular, lighting, drainage, landscaping, grading, access, and noise must not adversely affect the MHPA. Prior to issuance of any authorization to proceed, the following shall occur:
- Lighting should be directed away from the MHPA, and shielded if necessary and a note shall be included on the plans to the satisfaction of the Environmental Review Manager (ERM).
- Drainage should be directed away from the MHPA, or if not possible, must not drain directly into the MHPA. Instead, runoff should flow into sedimentation basins, grassy swales or mechanical trapping devices prior to draining into the MHPA. Drainage shall be shown on the site plan and reviewed satisfactory to the City Engineer.
- The landscape plan shall be review and approved by the ERM to ensure that no invasive non-native plant species shall be planted in or adjacent to the MHPA.
- All manufactured slopes must be included within the development footprint and outside the MHPA.
- All brush management areas shall be shown on the site plan and reviewed and approved by the ERM Zone 1 brush management areas must be included within the development footprint and outside the MHPA. Brush management Zone 2 may be permitted within the MHPA (considered impact neutral) but cannot be used as mitigation.
- Access to the MHPA, if any, should be directed to minimize impacts and shall be shown on the site plan and reviewed and approved by the ERM
- The following mitigation measures reflect species specific noise attenuation requirements in relationship to Bio-5.
- Construction noise as it effects sensitive avian species: Schedule the construction of projects to avoid impacts to wildlife (e.g., avoid the breeding season for sensitive species) to the extent practicable. If avoidance of construction during the breeding season is not feasible project-specific review shall define specific mitigation measures, such as berms and sound walls, which would reduce construction and operational.

COASTAL CALIFORNIA GNATCATCHER (Federally Threatened) LEAST BELL'S VIREO (State Endangered/Federally Endangered), SOUTHERN WILLOW FLYCATCHER (Federally Endangered)

Coastal California Gnatcatcher (Federally Threatened), least Bell's vireo (State Endangered/Federally Endangered), and Southwestern Willow Flycatcher Mitigation as outlined below shall be required for any grading or clearing activities in areas where there is potential to impact these species (Coastal California Gnatcatcher, -MHPA only). -

Prior to the issuance of any authorization to proceed, the City's Environmental Review Manager (or appointed designee) shall verify that the Multi-Habitat Planning Area (MHPA) boundaries and the following project requirements regarding the coastal California gnatcatcher, least Bell's vireo, and Southwestern Willow Flycatcher are shown on the grading and building permit plans:

No clearing, grubbing, grading or other construction activities shall occur between March 1 and August 15, the breeding season of the coastal California gnatcatcher; between March 15 and September 15, the breeding season of the least Bell's vireo; and between May 1 and September 1, the breeding season of the Southwestern Willow Flycatcher, until the following requirements have been met to the satisfaction of the ADD of LDR.

- A qualified biologist (possessing a valid Endangered Species Act Section 10(a)(1)(A) Recovery Permit) shall survey habitat areas (only within the MHPA for gnatcatchers) that would be subject to the construction noise levels exceeding 60 decibels [dB(A)] hourly average for the presence of the coastal California gnatcatcher, least Bell's vireo, and the Southwestern Willow Flycatcher. Surveys for this species shall be conducted pursuant to the protocol survey guidelines established by the U.S. Fish and Wildlife Service within the breeding season prior to the commencement of construction. **If the coastal California gnatcatchers, least Bell's vireo, and/or the Southwestern Willow Flycatcher are present, then the following conditions must be met:**
 - Between March 1 and August 15 for occupied gnatcatcher habitat, between March 15 and August 15 for occupied least Bells vireo habitat, and between May 1 and September 1 for occupied Southwestern Willow Flycatcher habitat, no clearing, grubbing, or grading of occupied habitat shall be permitted. Areas restricted from such activities shall be staked or fenced under the supervision of a qualified biologist; **AND**
 - Between March 1 and August 15 for occupied gnatcatcher habitat, between March 15 and August 15 for occupied least Bells vireo habitat, and between May 1 and September 1 for occupied Southwestern Willow Flycatcher habitat, no construction activities shall occur within any portion of the site where construction activities would result in noise levels exceeding 60 dB (A) hourly average at the edge of the occupied habitat. An analysis showing that noise generated by construction activities would not exceed 60 dB (A) hourly average at the edge of occupied habitat must be completed by a qualified acoustician (possessing a current noise engineer license or registration with monitoring noise level experience with listed animal species) and approved by the ERM at least two weeks prior to the commencement of construction activities; **OR**
 - At least two weeks prior to the commencement of clearing, grubbing, grading and/or any construction activities, under the direction of a qualified acoustician, noise attenuation measures (e.g., berms, walls) shall be implemented to ensure that noise levels resulting from construction activities will not exceed 60 dB(A) hourly average at the edge of habitat occupied by the aforementioned avian species. Concurrent with the commencement of construction activities and the construction of necessary noise attenuation facilities, noise monitoring shall be conducted at the edge of the occupied habitat area to ensure that noise levels do not exceed 60 dB (A) hourly average. If the noise attenuation techniques implemented are determined to be inadequate by the qualified acoustician or biologist, then the associated construction activities shall cease until such time

that adequate noise attenuation is achieved or until the end of the appropriate breeding season.

★ *Construction noise monitoring shall continue to be monitored at least twice weekly on varying days, or more frequently depending on the construction activity, to verify that noise levels at the edge of occupied habitat are maintained below 60 dB (A) hourly average or to the ambient noise level if it already exceeds 60 dB (A) hourly average. If not, other measures shall be implemented in consultation with the biologist and the ERM, as necessary, to reduce noise levels to below 60 dB(A) hourly average or to the ambient noise level if it already exceeds 60 dB(A) hourly average. Such measures may include, but are not limited to, limitations on the placement of construction equipment and the simultaneous use of equipment.*

- If the aforementioned avian species are not detected during the protocol survey, the qualified biologist shall submit substantial evidence to the ERM and applicable resource agencies which demonstrate whether or not mitigation measures such as noise walls are necessary during the applicable breeding seasons of March 1 and August 15, March 15 and September 15, and May 1 and September 1, as follows:
 - If this evidence indicates the potential is high for the aforementioned avian species to be present based on historical records or site conditions, then Condition 1-b or 1-c shall be adhered to as specified above.
 - If this evidence concludes that no impacts to the species are anticipated, no new mitigation measures are necessary.
- If the permittee begins construction prior to the completion of the protocol avian surveys, then the Development Services Department shall assume that the appropriate avian species are present and all necessary protection and mitigation measures shall be required as described in 1 a, b, and c.

SENSITIVE AVIAN SPECIES

- If project grading is proposed during the raptor breeding season (Feb. 1-Sept. 15), the project biologist shall conduct a pregrading survey for active raptor nests in within 300ft. of the development area and submit a letter report to MMC prior to the preconstruction meeting.
- If active raptor nests are detected, the report shall include mitigation in conformance with the City's Biology Guidelines (i.e. appropriate buffers, monitoring schedules, etc.) to the satisfaction of the City's Environmental Review Manager (ERM)). Mitigation requirements determined by the project biologist and the ERM shall be incorporated into the project's Biological Construction Monitoring Exhibit (BCME) and monitoring results incorporated in to the final biological construction monitoring report.
- If no nesting raptors are detected during the pregrading survey, no mitigation is required.
- Post Construction and operational noise as it effects sensitive avian species: For development projects utilizing any stationary noise generators (i.e. air conditioning

units), a site- specific acoustical analysis shall be conducted by a qualified acoustician in order to determine noise attenuation measures, if necessary, in order to reduce noise levels exceeding 60 dB(A) at the edge of occupied habitat.

- The City’s Biology Guidelines and MSCP Subarea Plan require that impacts to wetlands, including vernal pools, shall be avoided, and that a sufficient wetland buffer shall be maintained, as appropriate, to protect resource functions/values. For vernal pools, this includes avoidance of the watershed necessary for the continued viability of the ponding area. Where wetland impacts are unavoidable (determined case-by-case), they shall be minimized to the maximum extent practicable and fully mitigated per the Biology Guidelines. The biology report shall include an analysis of on-site wetlands (including City, state and federal jurisdiction analysis) and, if present, include project alternatives that fully/substantially avoid wetland impacts. Detailed evidence supporting why there is no feasible, less environmentally damaging location or alternative to avoid any impacts must be provided for City staff review, as well as a mitigation plan that specifically identifies how the project is to compensate for any unavoidable impacts. A conceptual mitigation program (which includes identification of the mitigation site) must be approved by City staff prior to the release of the draft environmental document. Avoidance is the first requirement; mitigation can only be used for impacts clearly demonstrated to be unavoidable.
- Limit the disturbance to native vegetation to the extent practicable. Revegetate with native plants where appropriate, and locate construction staging areas in previously disturbed areas.

RESOURCE AGENCY PERMITTING

Prior to the commencement of any construction related activities on-site for projects impacting wetland habitat (including earthwork and fencing) the applicant shall provide evidence¹ of the following to the ERM prior to any construction activity:

- Compliance with United States Army Corps of Engineers (ACOE) Section 404 nationwide permit;
- Compliance with the Regional Water Quality Control Board Section 401 Water Quality Certification; and
- Compliance with the CDFG Section 1601/1603 Streambed Alteration Agreement.

3.3.5 Significance of Impact with Mitigation Framework

No specific projects or actions have been identified with the Draft General Plan that would result in any direct or indirect physical change in the environment. However, future growth is anticipated and may occur on undeveloped land which may result in impacts to biological

¹ Evidence shall include either copies of permits issued, letter of resolutions issued by the responsible agency documenting compliance, or other evidence documenting compliance and deemed acceptable by the ADD of LDR.

resources. Therefore, for the purposes of this impact analysis, it is assumed impacts to biological resources may occur with future actions, such as community plan updates or amendments or individual project development proposals, and potential mitigation measures consistent with the City's Biology Guidelines, MSCP and ESL would be implemented.

Future environmental analysis would be required for any discretionary actions needed to implement the Draft General Plan. As discussed above, such proposals may result in significant impacts and project specific mitigation would be required. However, at the program level of analysis, impacts are considered significant and unavoidable

Notes and References

City of San Diego.

- 1996 *Development Services Department, Environmental Analysis Section/Public Projects and USFWS. Recirculated Draft Joint EIR/EIS Issuance of Take Authorizations for Threatened and Endangered Species Due to Urban Growth Within the MSCP Planning Area. LDR No. 93-0287. SCH No. 93121073. August.*
- 1997 *City of San Diego Multiple Species Conservation Program (MSCP): Background and Requirements, Implementing Agreement, Endangered Species Act section 10(a) incidental take permit (PRT-830421) July 1997.*
- 1997 *Multiple Species Conservation Program Subarea Plan (Draft) March 1997.*
- 1998 *Multiple Species Conservation Program Subarea Plan (Final) August 1998.*
- 2002 *Biological Review References. July 2002.*
- 2003 *Development Services Department, Environmental Analysis Section. Final Program Environmental Impact Report Canyon Sewer Cleaning Program and Long-Term Sewer Maintenance Program. Project Number: 6020. SCH No. 2002041129. December 2003.*
- 2003 *Biological Resources Report. City of San Diego Program Environmental Impact Report Canyon Sewer Cleaning Program and Long-Term Sewer Maintenance Program. June 2003 revised November 2003.*
- 2007 *Development Services Department Significance Determination Thresholds SANDAG.*
- 2004 *Final Program Environmental Impact Report for the Regional Comprehensive Plan for the San Diego Region.- SANDAG. SCH No. 2004011141. June 2004*



THE CITY OF SAN DIEGO
General Plan

Program Environmental
Impact Report

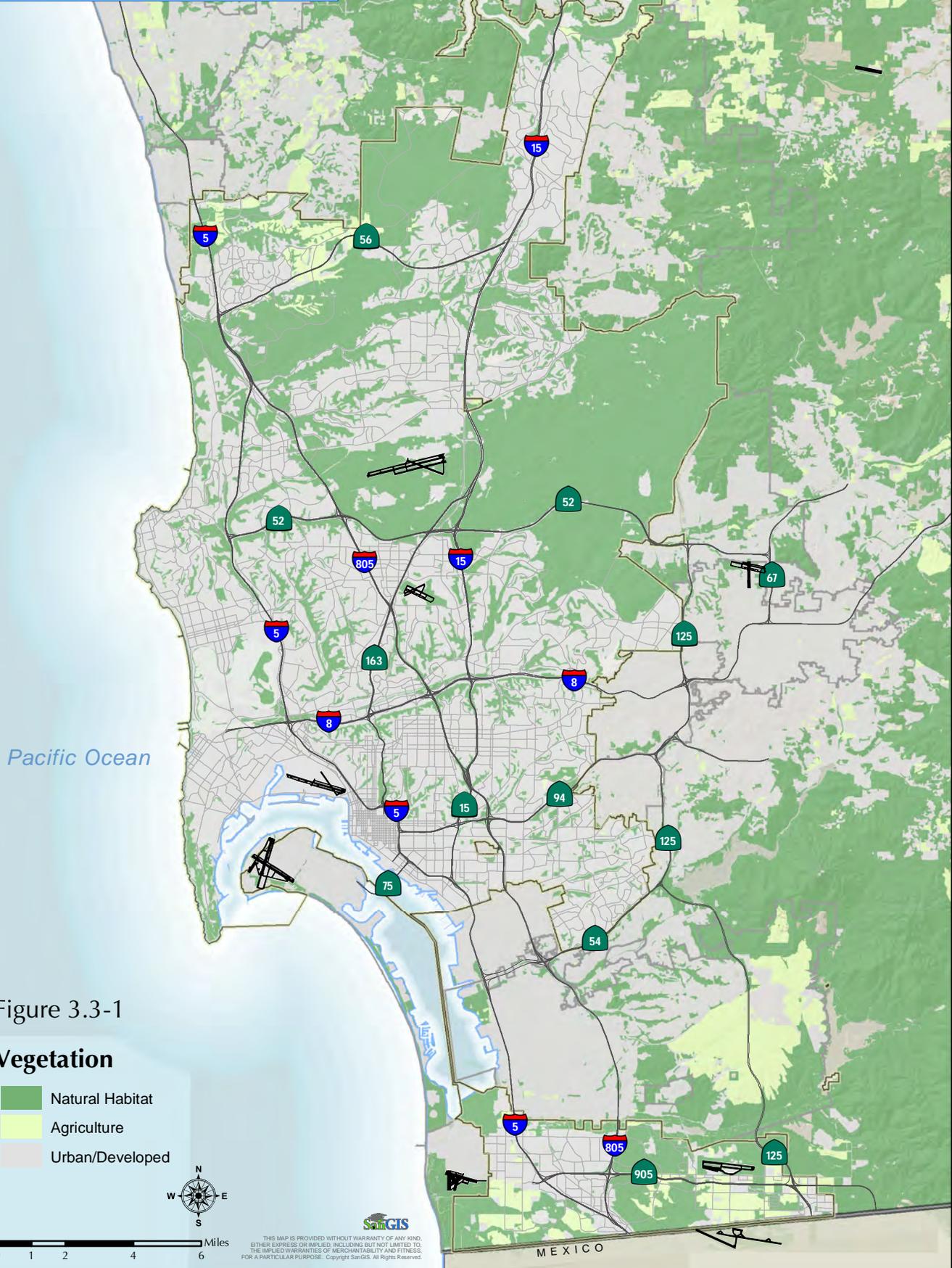


Figure 3.3-1

Vegetation

- Natural Habitat
- Agriculture
- Urban/Developed



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MEXICO

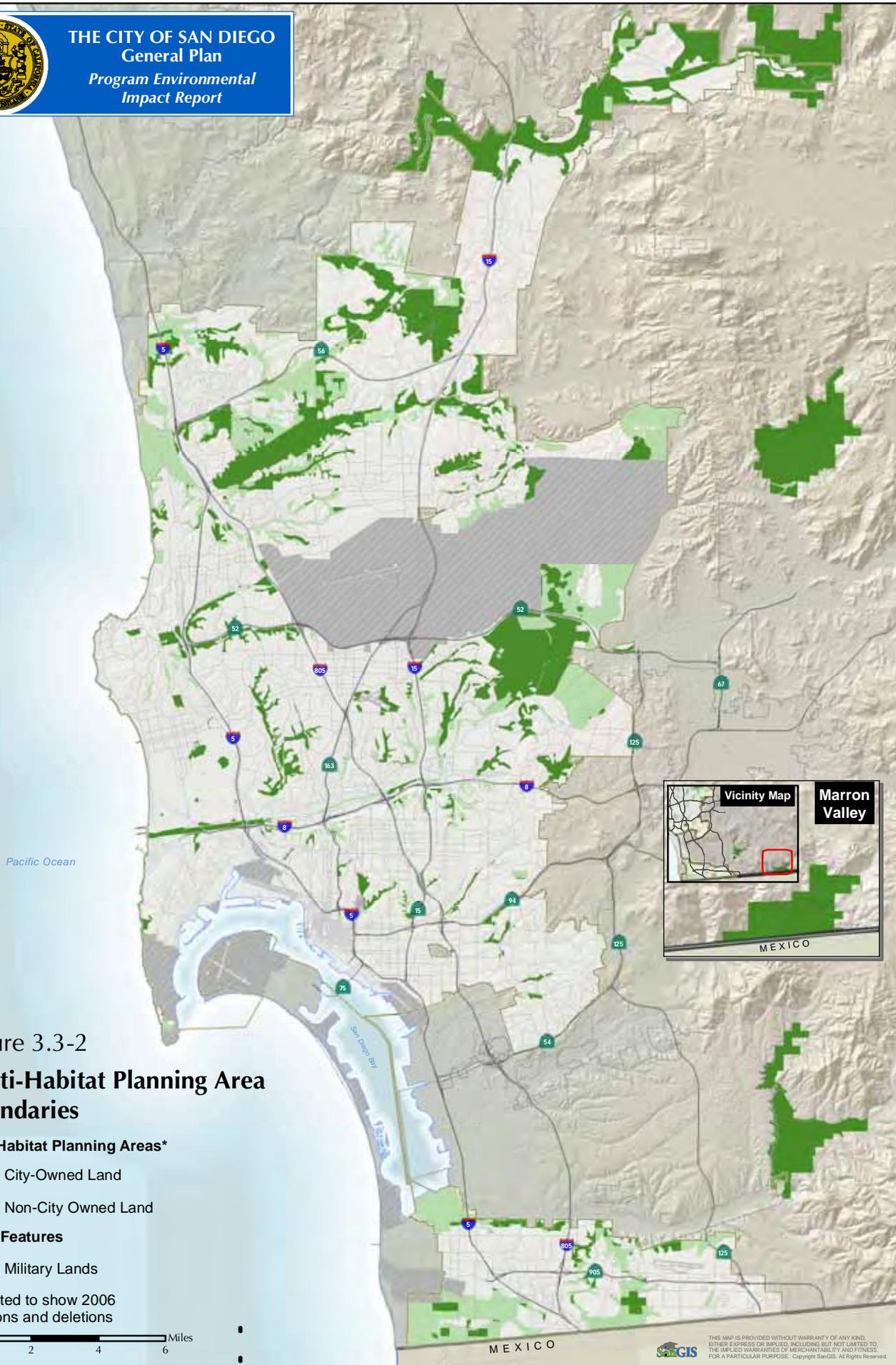


Figure 3.3-2
**Multi-Habitat Planning Area
 Boundaries**

Multit-Habitat Planning Areas*

- City-Owned Land
- Non-City Owned Land

Other Features

- Military Lands

*Updated to show 2006
 additions and deletions



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3.4 GEOLOGIC CONDITIONS

3.4.1 Existing Conditions

Geological Setting

The San Diego region is underlain by three principle geologic provinces. The majority of the county is in the Peninsular Ranges province bounded by the coastal province to the west and the Salton Trough province to the east. The western edge of the Peninsular Ranges province corresponds with the eastern hills and mountains along the edge of Poway, Lakeside, and El Cajon. Extending east of Julian and Jacumba, the province abruptly ends along a series of faults. To the north, the Peninsular Ranges province continues into the Los Angeles basin area; to the south it makes up the peninsula of Baja California.

As the Peninsular Ranges province experienced uplifting and tilting, a series of large faults, such as the Elsinore and San Jacinto, developed along the edge of the province. The eastern area “dropped” down, creating what is now known as the Salton Trough-Gulf of California depression. The Salton trough province, being lower than the surrounding landscape, became an area of deposition with sediments being carried to the depressed area by drainages of the peninsular ranges. Occasionally, the Salton Trough was inundated with marine waters from the Gulf of California, adding marine deposits to the sediment (Peterson, 1977).

The City of San Diego lies in the coastal plain province which extends from the western edge of the Peninsular Ranges and runs roughly parallel to the coastline. The province is composed of dissected, mesa-like terraces that graduate inland into rolling hills. The terrain is underlain by sedimentary rocks composed mainly of sandstone, shale, and conglomerate beds, reflecting the erosion of the Peninsular Ranges to the east.

Seismic Activity

Southern California is considered one of the most seismically active regions in the United States, with numerous active faults and a history of destructive earthquakes (County of San Diego, 1975). Earthquakes are caused by the release of accumulated strain along fractures in the earth’s crust. Several earthquake fault zones, as well as numerous smaller faults, exist in the City of San Diego and in Southern California, as depicted on **Figure 3.4-1**. Since high-magnitude shocks transmit energy over large areas, fault zones outside the City’s boundaries are included in this discussion.

The source of most earthquakes felt in San Diego is from the Imperial Valley, east of San Diego, and offshore fault systems (Lee, 1977). The Imperial Valley area is the most active source of local earthquakes and is the location of portions of the San Andreas, San Jacinto, and Elsinore faults. The San Andreas Fault, approximately 100 miles east of the City of San Diego, is outside the City and county limits but poses a potential hazard to the San Diego region. It extends a total of 650 miles from Baja California to the California coast north of San Francisco. In the vicinity

of the San Diego region, the San Andreas Fault follows the east side of Coachella and Imperial valleys. The nearest inhabited sections of the San Diego region are 30 miles away.

The San Jacinto fault is the largest of the active faults (faults that have moved in the last 11,000 years) in the San Diego region. The fault extends 125 miles from the Imperial Valley to San Bernardino. The maximum probable earthquake expected to occur along the San Jacinto fault would be a magnitude of 7.5 to 7.8 on the Richter scale. An earthquake of this magnitude would likely cause severe damage in nearby communities such as Borrego Springs and Ocotillo Wells, with the potential for moderate damage in the City of San Diego and coastal areas. Historical activity associated with the San Jacinto fault occurred in 1890, 1899, 1968, and 1979. The quake in 1968 had a recorded magnitude of 6.8 and was centered near Ocotillo Wells. The earthquake of 1979 was associated with a branch of the Imperial fault near the Mexican border and registered a magnitude of 6.4 on the Richter scale, causing extensive structural damage to Imperial Valley residences and businesses.

The Elsinore fault represents a serious earthquake hazard for most of the populated areas of the San Diego region. This fault is approximately 135 miles long, located approximately 40 miles north and east from Downtown San Diego. This fault can register earthquakes in the range of magnitude 6.9 to 7.0 on the Richter scale with an approximate recurrence interval of 100 years.

The Rose Canyon fault zone is an active offshore/onshore fault capable of generating an earthquake of magnitude 6.2 to 7.0 on the Richter scale. The fault zone lies partially offshore as part of the Newport/Inglewood fault zone and parallels the San Diego north county coastline within approximately two to six miles until coming ashore near La Jolla Shores. The onshore segment trends through Rose Canyon, through Old Town San Diego, and appears to die out in San Diego Bay (Abbott, 1989). Evidence of faulting in San Diego Bay is thought to be associated with this fault (county of San Diego, 1975). The fault zone is composed of a number of fault segments, including the Rose Canyon, Mount Soledad, and Country Club faults.

The La Nacion fault zone runs parallel to the Rose Canyon fault zone and San Diego Bay, approximately five miles inland from the bay. This fault is considered potentially active (county of San Diego, 1975).

The major offshore fault zones are the San Clemente, San Diego Trough, and Coronado Bank. The San Clemente fault zone, located 40 miles off La Jolla, is the largest offshore fault. It is estimated that the maximum plausible quake along this fault would be between magnitude 6.7 and 7.7 (Kern, 1988). An earthquake in 1951 registered 5.9 and was centered near the San Clemente fault (County of San Diego 1975). The San Diego Trough and Coronado Bank fault zones are capable of seismic events of magnitude 6.0 to 7.7 (Demere, 1997).

The location of the City of San Diego in close proximity to large earthquake faults increases the potential of earthquake damage to structures and potentially endangers the safety of the City's inhabitants. Damage to structures and improvements caused by a major earthquake will depend on the distance to the epicenter, the magnitude of the event, the underlying soil, and the quality of construction. The severity of an earthquake can be expressed in terms of both intensity and magnitude. The magnitude of an earthquake is measured by the amount of energy released at the

source of the quake. The Richter scale, developed in the 1930s for Southern California, is used to rapidly define earthquake size and estimate damage.

Table 3.4-1 describes the various hazards stemming from seismic activity in the City of San Diego. These seismic hazards include groundshaking, ground displacement, seismically induced settlement/subsidence, liquefaction, soil lurching, and tsunamis and seiches. **Figure 3.4-1** depicts areas of the City subject to the relative risk from various geotechnical forces described on **Table 3.4-1** below and slope failure described in the next section. The geotechnical and relative risk areas in the City are illustrated by the geographical inclusion of each area of the City into one of three risk areas: nominal to low, low to moderate, and moderate to high. The nominal to low category includes areas of the City with such geologic characteristics that may include: generally stable areas; level mesas underlain by terrace deposits and bedrock; favorable geologic structures; gently sloping terrain; and areas containing minor or no erosion potential. The low to moderate relative risk areas could include areas with such geologic characteristics as: possible or conjectured landslide areas; slide prone formations; unfavorable geologic structures such as Friars; level or sloping terrain; hydraulic fills; and/or local high erosion. The moderate to high relative risk areas could include such geologic conditions as: confirmed, known or highly suspected landslide areas; an active Alquist-Priolo fault zone; high erosion potential; steep bluffs; and/or unfavorable geologic structures. The categories illustrate the types of geotechnical risks that could be found in particular areas of the City and are not all inclusive of the geotechnical risks that may be present within a certain area. Additional analysis of geotechnical risks is required during the application review phase for development.

Soils and Slope Stability

Slope failure is the movement of soil and rock material downhill to a lower position. Landslides are the most common naturally occurring type of slope failure in San Diego. Block falls, slumps, and block glides are specific types of landslides. San Diego's landslides are commonly composite slides, a combination of block glides and slumps. Block falls are of concern primarily in coastal bluff areas (Ganus, 1977).

Earthquakes and their aftershocks can intensify or activate an unstable slope. Loosely and weakly consolidated soils, steepened slopes which are due to either human activities or natural causes, and saturated earth materials create a fragile situation easily affected by an earthquake. In the San Diego region, a major earthquake could cause the occurrence of landslides along sea cliffs, on mountain roadcuts, along the slopes of Palomar and Laguna Mountains, and in subdivisions where unprotected cut slopes occur in landslide-prone areas (county of San Diego, 1975).

Landslides in the San Diego region generally occur in sedimentary rocks such as sandstone, siltstone, mudstone, and claystone. When these fine-grained rocks are exposed to the erosional actions of air and water, they often turn into clay. Seams of saturated clays can be responsible for landslides even on gentle slopes.

**Table 3.4-1
Seismic Hazards**

Seismic Hazard	
Groundshaking	<p>When a break or rapid relative displacement occurs along the two sides of a fault, the tearing and snapping of the earth's crust creates seismic waves which are felt as a shaking motion at the ground surfaces. The most useful measure of severity of groundshaking for planning purposes is the Modified Mercalli Intensity scale. This scale, ranging from Intensities I to XII, judges shaking severity by the amount of damage it produces. Intensity VII marks the point at which damage becomes significant. Intensity VIII and above correspond to severe damage and problems that are of great community concern.</p> <p>For comparison, the Rose Canyon Fault, capable of producing a 7.0 magnitude earthquake, would have an intensity of VII-IX. Intensity IX earthquakes are characterized by great damage to structures including collapse.</p>
Ground Displacement	<p>Ground displacement is characterized by slippage along the fault, or by surface soil rupture resulting from displacement in the underlying bedrock. Such displacement may be in any direction and can range from a fraction of an inch to tens of feet. In San Diego, exposures are generally poor and most faults are either potentially active or inactive. However, if ground displacement were to occur locally, it would most likely be on an existing fault. Failure of the ground beneath structures during an earthquake is a major contributor to damage and loss of life. Many structures would experience severe damage from foundation failures resulting from the loss of supporting soils during the earthquake.</p>
Seismically Induced Settlement/ Subsidence	<p>Settlement of the ground may come from fault movement, slope instability, and liquefaction and compaction of the soil at the site. Settlement is not necessarily destructive. It is usually differential settlement that damages structures. Differential or uneven settlement occurs when the subsoil at a site is of non-uniform depth, density, or character, and when the severity of shaking varies from one place to another.</p>
Liquefaction	<p>Liquefaction is a process by which water-saturated granular soils transform from a solid to a liquid state during strong groundshaking. Primary factors controlling development of liquefaction include intensity and duration of ground accelerations, characteristics of the subsurface soil, in situ stress conditions, and depth of groundwater. Sites underlain by relatively loose, saturated deposits of fill, such as those found along the San Diego Bay, Mission Valley, and Downtown San Diego are susceptible to liquefaction.</p> <p>Lateral spreading is a lateral ground movement that takes place when liquefaction occurs adjacent to a slope or open face. The loss of strength in the liquefied material near the base of a slope can result in a slope failure. These kinds of failure have occurred adjacent to rivers and streams and along waterfronts and beaches during seismic events.</p>
Soil Lurching	<p>Soil lurching is the movement of land at right angles to a cliff, stream bank, or embankment due to the rolling motion produced by the passage of surface waves. It can cause severe damage to buildings because of the formation of cracks in the ground surface. The effects of lurching are likely to be most significant near the edge of alluvial valleys or shores where the thickness of soft sediments varies appreciably under a structure.</p>
Tsunamis and Seiches	<p>A tsunami is a sea wave generated by a submarine earthquake, landslide, or volcanic action. A major tsunami from either of the latter two events is considered to be remote for the San Diego area. However, submarine earthquakes are common along the edge of the Pacific Ocean, and all of the Pacific coastal areas are therefore exposed to the potential hazard of tsunamis to a greater or lesser degree. A seiche is an earthquake-induced wave in a confined body of water, such as a lake, reservoir, or bay.</p>

Bentonite clay is a component of many San Diego soils. It is expandable clay randomly interbedded with sandstone strata. The resistant beds of sandstone can assume a slick surface along with the heavy, waterlogged clays can “slide” down the unstable slope. A slope can be made potentially unstable by grading operations involving: (a) removing material from the bottom of the slope, thus, increasing the angle of the slope; (b) raising the height of the slope above the previous level; (c) saturating the slope with water from septic tank, gutter runoff, or diverted drainage from another part of the slope; or (d) adding fill to the top of the slope, creating additional weight (county of San Diego, 1973). In addition, earth-moving activities can reactivate an old slide.

Areas of the county which have experienced sliding are commonly underlain by the Ardath Shale, Friars, Mission Valley, San Diego, and Otay rock formations. The Ardath Shale Formation extends from Torrey Pines State Park to Mission Bay and is composed of Bentonite-rich clay (county of San Diego, 1973). The Friars Formation occurs from Mission Valley to beyond Rancho Bernardo. The formation is composed of expandable clays with properties similar to those of bentonite. The Mission Valley Formation is found from Mission Valley to Rancho Bernardo and consists of a mix of shale, bentonite, and sandstone (SDSU, 2004). The San Diego Formation occurs throughout the coastal mesas from Mission Valley southward to the Mexican border and consists of fine to medium sandstone. The Otay Formation is found in the southwestern portion of the San Diego region and is composed of slide-resistant sandstone with occasional thin interbedding of bentonite clay (county of San Diego, 1973).

Erosion

Erosion is defined as a combination of processes in which the materials of the earth’s surface are loosened, dissolved, or worn away, and transported from one place to another by natural agents. There are two types of soil erosion: wind erosion and water erosion. Erosion potential in soils is influenced primarily by loose soil texture and steep slopes. Loose soils can be eroded by water or wind forces, whereas soils with high clay content are generally susceptible only to water erosion. The potential for erosion generally increases as a result of human activity, primarily through the development of structures and impervious surfaces and the removal of vegetative cover.

Because much of the City of San Diego is characterized as having slopes greater than 25 percent in grade, there are many areas subject to erosion. **Figure 3.16-1 (see Visual Effects section)** depicts areas of the City with such slopes. Development on slopes greater than 25 percent tends to require engineering applications, which act to reduce development potential.

Table 3.4-2 identifies and summarizes the principal geologic hazards within the City, which include landslides, coastal bluffs, and debris flow or mudslide prone areas.

**Table 3.4-2
Geologic Hazards**

Geologic Hazard	
Landslide and Slope Stability	<p>Old landslides and landslide-prone formations are the principal non-seismic geologic hazards within the City. Conditions which should be considered in regard to slope instability include inclination, characteristics of the soil and rock orientation of the bedding, and the presence of groundwater.</p> <p>The causes of classic landslides start with the preexisting condition inherent within the rock body itself that can lead to failure. The actuators of landslides can be both natural events such as earthquakes, rainfall and erosion and human activities such as grading and filling.</p> <p>Some of the areas where landslides have occurred are: Otay Mesa; the east side of Point Loma; the vicinities of Mount Soledad, Rose Canyon, Sorrento Valley, and Torrey Pines; portions of Rancho Bernardo and Los Peñasquitos; and along Mission Gorge in the vicinity of the second San Diego Aqueduct.</p>
Coastal Bluffs	<p>Coastal bluffs are land features that have resulted from the actions of sea wave forces on geologic formations and soil deposits. Geologic factors that affect the stability of bluffs include rock type, jointing and fracturing, faulting and shear zones, and base erosion. Where bluffs are eroding quickly, measures to reduce bluff degradation may be necessary in order to preserve the bluff line.</p> <p>In the Torrey Pines area, the coastal bluffs have experienced sizeable landslides where oversteepening of the seacliff has resulted in unstable conditions. In addition, rock falls have occurred in the Sunset Cliffs area due to undermining of the sandstone.</p>
Debris Flows or Mudslides	<p>A debris flow or mudslide is a form of shallow landslide involving soils, rock, plants, and water forming a slurry that flows downhill. This type of earth movement can be very destructive to property and cause significant loss during periods of heavy rainfall. The City of San Diego is susceptible to mudslides due to abundant natural, hilly terrain and steep manufactured slopes. Steeply-graded slopes tend to be difficult to landscape and are often planted with shallow-rooted vegetation on a thin veneer of topsoil. When saturated, these loose soils behave like a liquid and fail.</p>

Regulatory Setting

Administrative actions have been implemented by local, state and federal agencies to reduce the effects of such geologic hazards as earthquakes and landslides.

The City uses the San Diego Seismic Safety Study, a set of geologic hazard maps and associated tables, as a guideline to correlate the acceptable risk of various land uses with seismic (and geologic) conditions identified for the site. Large and complex structures, and places attracting large numbers of people, are the most restricted as to geographic location based on site conditions. These facilities include dams, bridges, emergency facilities, hospitals, schools, churches, and multistory office and residential structures. Low- and medium-density residential development is considered land use of a lesser sensitivity and is therefore “suitable” or “provisionally suitable” (requiring site stabilization) under most geologic conditions. Uses with only minor or accessory structures can be located on sites with relatively greater risk due to lower user intensity associated with activities such as parks and open space, agriculture, and most industrial land uses. Geotechnical investigations are required to be performed prior to site

development. The scope of investigations can range from feasibility surveys to extensive field exploration and engineering/geologic/seismic analyses depending upon the complexity of site conditions and the intensity of the proposed land use.

San Diego has been required to enforce the State Earthquake Protection Law (Riley Act of 1933) since its enactment in 1933. However, the seismic resistance requirements of the law were minimal for many years and San Diego did not embrace more restrictive seismic design standards until the adoption of the 1952 Uniform Building Code. Other applicable state regulations include the Alquist-Priolo Earthquake Fault Zoning Act of 1972, the Seismic Hazards Mapping Act of 1997, and the Unreinforced Masonry Law of 1986.

The California Earthquake Loss Reduction Plan was developed by the California Seismic Safety Commission in fulfillment of a mandate enacted by the Legislature in the California Earthquake Hazards Reduction Act of 1986. The plan is a comprehensive strategic document that sets forth the vision for a safer California and provides guiding policies. Incorporating lessons learned from all previous earthquakes, the plan is periodically updated for approximately five-year timeframes to continue to support new and ongoing efforts to protect California residents and the built environment. Such efforts are effective in reducing damage and injury from succeeding earthquakes. The City's development guidelines are consistent with state regulations and requirements.

Slope instability or erosion problems in the City are primarily regulated through the California Building Code (CBC) and the City's grading ordinance. The CBC requires special foundation engineering and investigation of soils on proposed development sites located in geologic hazard areas. These reports must demonstrate either that the hazard presented by the project will be eliminated or that there is no danger for the intended use. To reduce slide danger and erosion hazards, a grading permit must be obtained for all projects involving the process of moving soil and rock from one location to another. Grading ordinances are designed in part to assure that development in earthquake- or landslide-prone areas does not threaten human life or property. The CBC contains design and construction regulations pertaining to seismic safety for buildings (Bonneville and Huissain, 1997). These regulations cover issues such as the conversion of working stress to strength basis, ground motions, soil classifications, redundancy, drift and deformation compatibility, and designs of nonbuilding structures and nonstructural components. Recent improvements have been incorporated into the CBC in order to prevent structural collapse. One concept which has been utilized to improve upon conventional designs is that of increasing a structure's ductility, which is the ability of a structure to absorb energy. Another key concept is inelastic response, in which engineers calculate the maximum inelastic response displacement to determine a structure's drift and deformation compatibility with a seismic event. New soil profile classifications have also been adopted to ensure that structural designs are compatible with the soil subsurface on which they are constructed. While these regulations and improvements are intended to reduce the potential for loss of life, they cannot prevent all damage during a seismic event. However, these designs can greatly reduce the likelihood of a structural collapse during a seismic event.

Many of the City's most slide-prone or erosion-prone areas occur along the coastal bluffs which are within the jurisdiction of the California Coastal Commission. In addition to protecting

unique recreational and natural resources, the Coastal Commission requires the evaluation of the geologic hazards associated with coastal development. The local geologic background and potential for geologic impacts are important components of the San Diego Local Coastal Program, which guides development in the coastal zone.

3.4.2 Thresholds of Significance

A significant impact could occur if implementation of the Draft General Plan:

- Results in the exposure of people or property to geologic hazards such as groundshaking, fault rupture, landslides, mudslides, ground failure, or similar hazards.
- Results in a substantial increase in wind or water erosion of soils.
- Results in allowing structures to be located on a geological unit or soil that is unstable or that would become unstable and potentially result in on-site or off-site landslides, lateral spreading, subsidence, liquefaction or collapse.

3.4.3 Impact Analysis

Could implementation of the Draft General Plan result in the exposure of people or property to geologic hazards such as groundshaking, fault rupture, landslides, mudslides, ground failure, or similar hazards?

Seismic Activity

The entire San Diego region is susceptible to impacts from seismic activity, including earthquakes and ground-shaking events. Numerous active faults are known to exist in the City and region that could potentially generate seismic events capable of significantly affecting existing and proposed development. The Draft General Plan calls for future growth to be focused in compact, mixed-use activity areas. As the Draft General Plan is implemented over time in association with community plans and regulations, the associated development may result in an increase in the number of people and buildings exposed to seismic ground-shaking. Potential effects from surface rupture and severe groundshaking could cause damage ranging from minor to catastrophic. Groundshaking could also cause secondary geologic hazards such as slope failures and seismically-induced settlement. This is considered a potentially significant impact.

Although seismic activity can cause damage to substandard construction, new designs can substantially reduce potential damage. Earthquake-resistant designs employed on new structures reduce the risk to public safety from seismic events. All proposed development projects are required to adhere to design standards, grading, and construction practices to avoid or reduce geologic hazards. Regulatory agencies with oversight of development associated with the Draft General Plan apply regulations and engineering design specifications to consider and compensate for site-level geologic and seismic conditions.

Numerous structures throughout the City pre-date the most recent and more stringent seismic and geologic regulations currently in place, and expose people to increased risk. Although the City maintains regulations to identify potential hazards from unreinforced masonry bearing wall buildings, the regulations are largely voluntary and exempt many residential structures. Until those structures are replaced or substantially rehabilitated, existing risks from seismic and geologic hazards will remain.

The Draft General Plan contains policies in the Public Facilities, Services and Safety Element which address geologic hazards. These policies call for maintaining geologic hazard narrative and mapped information, adhering to state laws for seismic and geologic hazards, abating structures that present dangers during seismic events, and consultation with qualified geologists and seismologists on development projects.

Proposals for development are required to be reviewed by appropriate regulatory agencies prior to construction. Developments that occur in the City of San Diego are required to meet design standards that address seismically active areas and comply with the CBC. Mitigation measures would reduce the risks associated with seismic activity. However, since the Draft General Plan does not include specific development projects, it is infeasible at the Program EIR level to provide specific mitigation that would reduce impacts to a less than significant level. Therefore, there is potential for a significant and unavoidable impact associated with seismic activity.

Slope Failure

Slope failure results in landslides and mudslides from unstable soils or geologic units. Given that future development would occur in the course of implementing the Draft General Plan, it is anticipated that some of this development would be constructed on geologic formations susceptible to slope failure, thereby increasing the risk to people and structures. This is considered a potentially significant impact. However, site-specific geotechnical investigations would be required prior to construction in order to properly design any proposed development. Additionally, all projects are required to adhere to state of California design standards and all standard design, grading, and construction practices to avoid or reduce geologic hazards.

In addition, regulatory agencies with oversight of development within the City of San Diego have regulations and engineering design specifications to address and compensate for site-level geologic and seismic conditions. All site designs must be reviewed and approved by the appropriate agencies. Mitigation measures would reduce the risks associated with slope failure. However, since the Draft General Plan does not include specific development projects, it is infeasible at the Program EIR level to provide specific mitigation that would reduce impacts to a less than significant level. Therefore, there is potential for a significant and unavoidable impact associated with slope failure.

Could implementation of the Draft General Plan result in a substantial increase in wind or water erosion of soils?

High erosion potential in soils is primarily caused by loose soils and steep slopes. The potential for erosion generally increases as a result of human activity, primarily through the development

of structures and impervious surfaces and the removal of vegetative cover. As stated above, future development will occur through implementation of the Draft General Plan. Future development that is on or in proximity to areas with steep slopes could increase erosion potential. Adherence to the City's grading ordinance would reduce potential impacts. However, since the Draft General Plan does not include specific development projects, it is infeasible at the Program EIR level to provide specific mitigation that would reduce impacts to a less than significant level. Therefore, there is potential for a significant and unavoidable impact associated with erosion.

Could implementation of the Draft General Plan result in allowing structures to be located on a geological unit or soil that is unstable or that would become unstable and potentially result in on-site or off-site landslides, lateral spreading, subsidence, liquefaction or collapse?

Future development may be proposed in areas prone to landslides or where soil limitations (i.e. those prone to liquefaction, subsidence, collapse, etc.) present a hazard to people. This is considered a potentially significant impact. Implementation of mitigation measures would reduce potential impacts. However, since the Draft General Plan does not include specific development projects, it is infeasible at the Program EIR level to provide specific mitigation that would reduce impacts to a less than significant level. Therefore, there is potential for a significant and unavoidable impact associated with unstable geology and soils.

3.4.4 Mitigation Framework

Adherence to regulations and engineering design specifications are generally considered to preclude significant geologic impacts, and no mitigation is proposed at this program level of review. Goals, policies, and recommendations enacted by the City combined with the federal state and local regulations described above provide a framework for developing project level measures for future projects. Through the City's project review process compliance with standards is required of all projects and is not considered to be mitigation. However, it is possible that for certain projects, adherence to the regulations may not adequately protect against geologic impacts and such projects would require additional measures to avoid or reduce impacts. These additional measures would be considered for each future project requiring mitigation (i.e., measures that go beyond what is required by existing regulations).

Site-specific measures will be identified that reduce significant project-level impacts to less than significant, or the project level impact may remain significant and unavoidable where no feasible mitigation exists. Where mitigation is determined to be necessary and feasible, these measures will be included in a Mitigation Monitoring and Reporting Program (MMRP) for the project. These measures may be updated, expanded and refined when applied to specific future projects based on project-specific design and changes in existing conditions, and local, state and federal laws. General measures that may be implemented to preclude or reduce impacts include:

- Preparation of soil and geologic conditions surveys to determine site specific impacts and mitigation designed to mitigate survey recommendations;
- Implementation of state seismic and structural design requirements;

- Implementation of regulations designed to minimize erosion of cliffs, hillsides, and shorelines during and after construction; and
- Innovative grading techniques that reduce landslide and erosion hazard impacts to a greater degree than typically achieved through implementation of grading regulations.

3.4.5 Significance of Impact with Mitigation Framework

Since the Draft General Plan does not include specific development projects, it is infeasible at the Program EIR level to provide specific mitigation that would reduce any future impacts to a less than significant level. Therefore, at this program level of review, significant and unavoidable impacts associated with seismic and geologic hazards, erosion, and unstable geology and soils remains.

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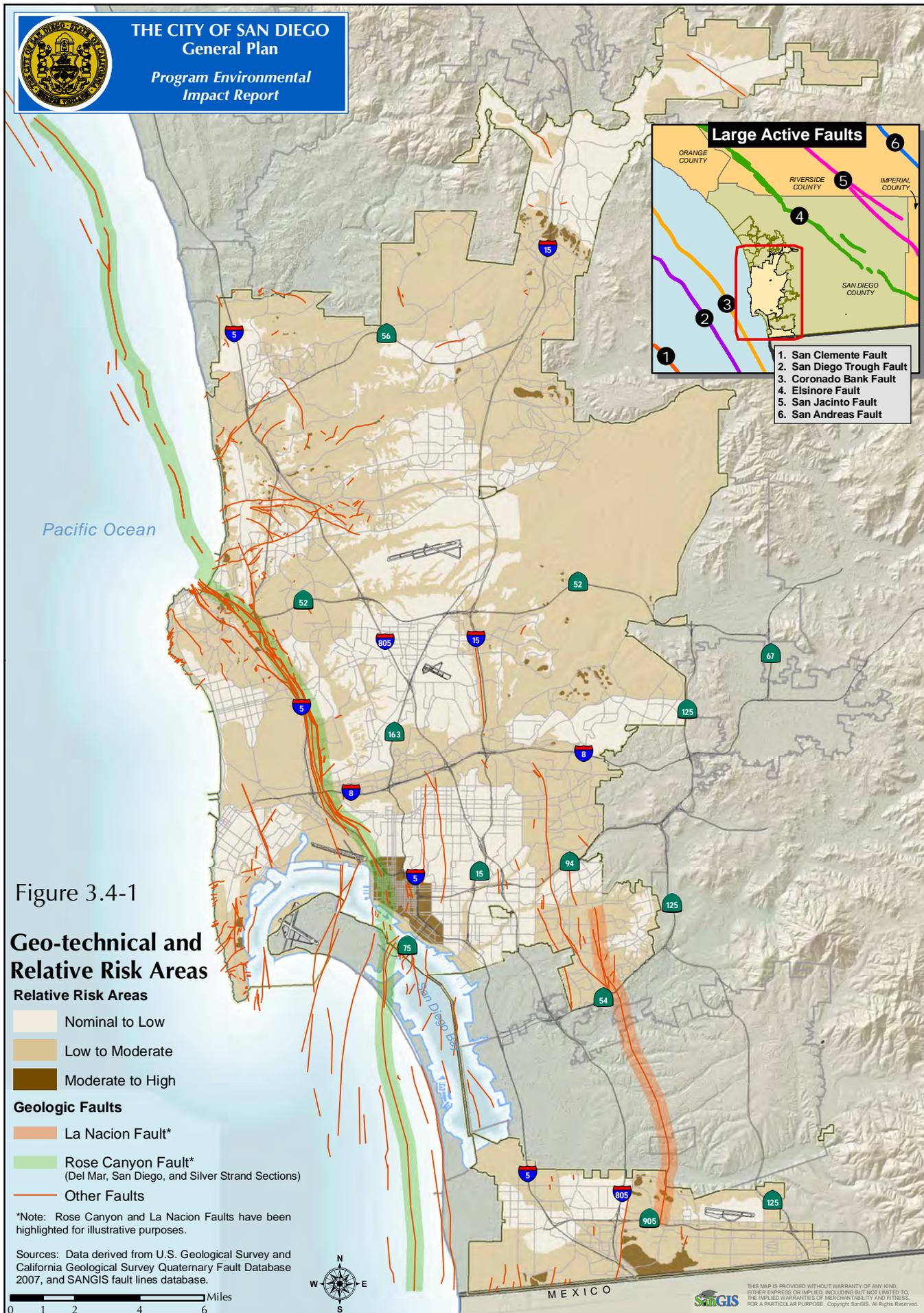
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3.5 HEALTH AND SAFETY

3.5.1 Existing Conditions

Hazardous Materials

Hazardous materials are used in San Diego for a variety of purposes including maintenance and operations at airfields and waterfront ports, manufacturing, service industries, various small businesses, agriculture, medical uses, schools, and households.

Hazardous Materials Handlers/Generators

Many chemicals used in household cleaning, construction, dry cleaning, film processing, landscaping, and automotive maintenance and repair are considered hazardous. Businesses that handle/generate hazardous materials within the City of San Diego are monitored by the United States (U.S.) Environmental Protection Agency (EPA). Small quantity hazardous waste generators include facilities such as automotive repair, dry cleaners, and medical offices.

San Diego County Area Plan

The County of San Diego Department of Environmental Health, Hazardous Materials Division established the San Diego County Area Plan (Area Plan) based on requirements of Chapter 6.95 of the California Health and Safety Code, Title 19 of the California Code of Regulations and the United States (U.S.) Environmental Protection Agency Superfund Amendments and Reauthorization Act Title III for emergency response to a release or threatened release of a hazardous material within the County. The Hazardous Materials Program and Response Plan contained in the Area Plan serves the majority of the cities in San Diego County, including the City of San Diego.

As part of the Area Plan, the Federal Risk Management Plan (RMP), as incorporated and modified by the State of California Accidental Release Prevention (CalARP) program, is designed to prevent harm to people and the surrounding environment by the use of various organized systems to identify and manage hazards. The goal of the CalARP program is to make all facilities that handle regulated substances free of catastrophic incidents.

Any stationary source (business) that exceeds the threshold quantities of regulated substances is required to submit a RMP under the CalARP program. A Business Emergency Plan (BEP) must be submitted by all businesses that handle hazardous materials over a designated threshold quantity. Upon completion of a BEP, the BEP is submitted to San Diego's local Certified Unified Program Agency (CUPA). The CUPA with responsibility for the City of San Diego is the County of San Diego Department of Environmental Health, Hazardous Materials Division. A BEP contains vital information that may be utilized to minimize the effects and extent of a threatened release of hazardous materials. In addition, this information allows emergency response personnel to determine potential risks and hazards while developing a strategy for handling an emergency involving hazardous material. Annually submitted RMPs are currently reviewed by the County Environmental Health Department.

If a hazardous materials emergency occurred within the City of San Diego, the first response would be from the San Diego Fire-Rescue Department and the County of San Diego Hazardous Incident Response Team (HIRT), located within the City of San Diego.

Leaking Underground Storage Tanks

According to the State Water Resources Control Board's (SWRCB) Leaking Underground Storage Tank (LUST) database (LUST, 2006), 32 LUST tanks have been identified within the Draft General Plan planning area. These cases remain open and are currently being assessed. The majority of these tanks have leaked gasoline, and the remaining has leaked diesel and/or waste oil. The San Diego County Department of Environmental Health also maintains a list of open and closed sites on their website.

Oil and Gas Wells

According to the State Department of Conservation's Division of Oil, Gas, and Geothermal Resources (DOGGR) database, 21 idle wells and 12 plugged and abandoned oil or gas wells have been identified with the Draft General Plan planning area as shown in Figure 3.5-1. DOGGR also maintains a list and maps oil and gas wells on their website. The state defines an idle well as a well that has not produced oil and/or gas or has not been used for fluid injection for six consecutive months during the last five years. Plugged and abandoned wells are wells that have ceased oil or gas production and have been sealed with a cement plug.

Transportation of Hazardous Materials

Hazardous materials pass through the City via the freeway, rail and surface street system. Interstates 5 (I-5), 805, 8, and 15, and State Highways 56, 52, 94, 163, and 905 pass through the City. The Burlington Northern and Santa Fe railway runs generally parallel to I-5. While train derailment can occur at anytime, it is during an earthquake that a derailment and hazardous materials release would pose the greatest risk. The major automotive transportation routes through the City include the freeways above, as well as dozens of major arterial roads dispersed across the City.

The City has no direct authority to regulate the transport of hazardous materials on state highways or rail lines. Transportation of hazardous materials by truck and rail is regulated by the U.S. Department of Transportation (DOT). The DOT regulations establish criteria for safe handling procedures. Federal safety standards are also included in the California Administrative Code. The California Health Services Department regulates the haulers of hazardous waste.

Flooding

Urbanization involving buildings, pavement, roofs, and generally any new impervious surface increases the amount of water runoff entering local drainage systems. Rainfall that might otherwise have been absorbed by vegetation and soil and cleansed through the natural filtration process is free to flow over the solid surface. Hence, urbanization has the potential to further

increase the frequency and occurrence of flooding because of increases in peak flow velocities and volumes.

San Diego often experiences prolonged dry periods, punctuated by infrequent wet periods of a one- to two-year duration. **Table 3.5-1** shows the average yearly rainfall, based on a water year (October-September), for 1964 thru 2005. The average yearly rainfall in coastal San Diego areas is 10.3 inches per year. A wet year is defined as having a yearly average above 10.3 inches. Much of the development in the San Diego region has taken place during the extended dry periods. Residential development has occurred within many of the region's natural watersheds. This construction directly increases the potential for flood damage.

Table 3.5-1
Average Yearly Rainfall in San Diego

Year	Average Yearly Rainfall (inches)	Year	Average Yearly Rainfall (inches)	Year	Average Yearly Rainfall (inches)
1964	5.2	1978	17.3	1992	12.5
1965	8.8	1979	14.9	1993	18.3
1966	14.8	1980	15.6	1994	9.9
1967	10.9	1981	8.1	1995	17.1
1968	7.9	1982	11.9	1996	5.2
1969	11.5	1983	18.5	1997	8.7
1970	6.2	1984	5.4	1998	20.9
1971	8.0	1985	9.6	1999	6.5
1972	6.1	1986	14.6	2000	15.8
1973	11.0	1987	9.3	2001	8.8
1974	6.6	1988	12.4	2002	3.4
1975	10.6	1989	5.9	2003	10.2
1976	10.1	1990	7.6	2004	5.3
1977	9.2	1991	12.3	2005	22.8

Source: SDCWA 2006

Federal Executive Order 11988, Floodplain Management, was issued in 1997. The major requirements of this order are to discourage floodplain development; to prevent uneconomic, hazardous, or incompatible use of floodplains; to protect and preserve the natural and beneficial floodplain values; and to be consistent with the standards and criteria of the National Flood Insurance Program (NFIP). The NFIP program provides federal flood insurance and federally financed loans for property owners in flood prone areas. To qualify for federal flood insurance, the City must identify flood hazard areas and implement a system of protective controls. The City of San Diego participates in the NFIP, which is administered by the Federal Emergency Management Agency (FEMA), and as required by the program's regulations, has adopted and enforces its own floodplain development ordinance.

FEMA has outlined the floodplains for the major water bodies in the region. This designation is determined by predicting the amount of discharge associated with a 100-year flood. A 100-year flood has a one percent probability of occurrence in any given year. A map of FEMA Special Flood Hazard Zones, floodplains, or other areas prone to flooding with the City of San Diego is depicted on **Figure 3.5-12**.

The City of San Diego owns and maintains nine reservoirs in the region: Barrett, El Capitan, Hodges, Lower Otay, Upper Otay, Miramar, Murray, San Vicente, and Sutherland. Should a dam at these reservoirs fail during a major seismic event, there would likely be severe loss of life or property downstream. The potential for dam failure has been evaluated at each of the City-operated dams, and all have been found to be capable of resisting seismic damage (county of San Diego 1991). Nevertheless, failure could potentially occur, and affected areas would be similar to natural floodplains. Specific areas which could be affected by dam inundation are illustrated on **Figure 3.5-12**. Major water bodies located in proximity to potential target areas for the Draft General Plan include the San Diego Bay, Mission Bay, Otay River, Los Penasquitos Lagoon, Tecolote Creek, and Lake Hodges (SANGIS, 2004). In addition, the San Diego, Otay, Tijuana, and San Dieguito rivers can experience flooding that impact roadways and vehicular circulation. Flooding typically affects local streets and roads, but some regional arterials are also impacted.

Wildland Fires

Due to climate, topography, and native vegetation, the City of San Diego is subject to both wildland and urban fires. In October 2003, over 28,000 acres of the City of San Diego (12 percent of City acreage) between the communities of Scripps Ranch and Tierrasanta burned in what was known as the Cedar Fire. Approximately 335 structures, mostly single-family homes, were destroyed and another 71 structures were damaged. In June 1985, a wildfire started and raced up the canyon hillsides of the dense mid-city neighborhood of Normal Heights, destroying 76 homes and damaging dozens more. These fires revealed the severity of the risk of wildland fires and the devastation that can result.

The extended droughts characteristic of the region's Mediterranean climate result in large areas of dry vegetation that provide fuel for wildland fires. The most critical times of year for wildland fires are late summer and fall when Santa Ana winds bring hot, dry desert air into the region. The air temperature quickly dries vegetation, thereby increasing the amount of natural fuel. Development pressures increase the threat of wildland fire on human populations and property as development is located adjacent to areas of natural vegetation.

Figure 3.5-23 depicts the areas of the City which are within a High Fire Hazard Area. For residents in these areas, wildfire is a potential hazard. The urbanized portions of the City are also subject to structural fires. The San Diego Fire-Rescue Department is responsible for the preparation, maintenance, and execution of Fire Preparedness and Management Plans. In the event of a large wildfire within or threatening City limits, they could be assisted by the California Department of Forestry, Federal Fire Department, or other local fire department jurisdictions.

Emergency Preparedness

Local Emergency Operations Plans are intended to help local jurisdictions respond to emergency situations with a coordinated system of emergency service providers and facilities. San Diego recently updated its 1995 Multi-Hazard Functional Plan and modernized its Emergency Operations Center (EOC). The City will continue to make regular modifications to these in the future as hazards, threats, population and land use, or other factors change. The plan identifies resources available for emergency response and establishes coordinated action plans for specific emergency situations including earthquake, fire, major rail and roadway accidents, flooding, hazardous materials incidents, terrorism and civil disturbances.

San Diego places a high priority on public disaster education. Citizens are provided a range of emergency management training, including FEMA Community Emergency Response Team (CERT) training, emergency preparedness workshops, disaster presentations at schools, CPR, first aid training, and terrorism awareness training. CERT, organized through the San Diego Fire-Rescue Department, is comprised of volunteers who are trained to assist during times of emergency.

The response phase includes increased readiness, initial response and extended response activities. During an emergency response, the City would generally coordinate activities through its EOC. County, state and federal emergency response resources are located within San Diego and are available to assist the EOC if a situation demanded additional support. The EOC is manned 24 hours a day by both public safety and other City personnel to coordinate emergency response activities. Recovery activities involve restoration of services and returning the affected area to pre-emergency conditions as soon as practical. Recovery activities range from restoring water and power to providing information to the public regarding state and federal disaster assistance programs. Mitigation efforts occur both before and after emergencies or disasters. Mitigation includes eliminating or reducing the likelihood of future emergencies.

Aircraft Hazards

San Diego International Airport, Marine Corps Air Station Miramar, Brown Field Municipal Airport, and Montgomery Field Municipal Airport are located within the City of San Diego, Tijuana International Airport, Gillespie Field, Naval Air Station North Island, and Naval Outlying Field Imperial Beach are located adjacent to the City of San Diego, but have the potential to affect land use and people within the City as shown on **Figure 3.5-34**.

San Diego International Airport (SDIA) at Lindbergh Field is the commercial air carrier airport serving the region and is located adjacent to downtown San Diego. Primarily commercial air carrier aircraft with a limited number of cargo, general aviation corporate jet, and military aircraft use SDIA totaling over 210,000 flights per year. It is the busiest single-runway airport in the nation. In 2005, SDIA served 17.4 million passengers and handled 188,000 tons of air cargo. The Airport Authority has forecasted that by 2015 there could be 22.8 million annual passengers using SDIA. The forecast also indicates that the demand for air travel will increase beyond 2015; SDIA will be constrained by the capacity of its single runway at 2015. Although various industrial, commercial, and residential uses surround the airport, residential is the primary use and the most affected by the airport due to be located in the City's urban center. The San Diego

County Regional Airport Authority (Airport Authority) as the operator of SDIA is currently in the process of preparing an updated airport master plan to increase the number of gates, terminal space, vehicle and aircraft parking, and surface access. It does not include increasing runway capacity.

Marine Corps Air Station (MCAS) Miramar, which is located north of Kearny Mesa and south of Mira Mesa, operates a mixture of jet fighter, transport, and helicopter aircraft. Military readiness requires constant training which includes touch and goes (takeoffs and landings with a close-in circuit around the airport), aircraft carrier simulated landings, practice instrument approaches, and normal departures to and arrivals from other installations or training areas.

Brown Field and Montgomery Field municipal airports provide business, corporate, training, and charter aviation services that support commercial and industrial activities within the region for propeller and jet powered aircraft and helicopters. They serve as locations for public safety and law enforcement agencies to provide services to the region. Both airports help to relieve general aviation congestion at SDIA. Brown Field is a port of entry for private aircraft coming from Mexico. The City has issued a request for qualifications to develop and operator a fixed base operator or other related aviation business on Brown Field adjacent to Otay Mesa Road.

Brown Field is located in Otay Mesa near the border with Mexico, and is rapidly developing from an undeveloped mesa to an industrial, commercial, and residential community. Montgomery Field is located in Kearny Mesa which primarily contains industrial and commercial uses. Adjacent to Kearny Mesa are the residential communities of Serra Mesa, Tierrasanta, Linda Vista, and Clairemont Mesa. The City is in the process of updating the Montgomery Field Airport Master Plan.

Military aircraft operations at Naval Air Station (NAS) North Island and Naval Outlying Field (NOLF) Imperial Beach primarily use the airspace over the Pacific Ocean and the San Diego Bay, but have the potential to fly over land within the City of San Diego. The primary traffic pattern for helicopters training at NOLF Imperial Beach is along the Tijuana River Valley and then offshore. NAS North Island is located in the city of Coronado with a small portion within the City of San Diego tidelands and operates a mixture of jet fighter, transport, and helicopter aircraft. NOLF Imperial Beach is located in the city of Imperial Beach with a small portion within the City of San Diego and serves as a training area for helicopter aircraft.

The Tijuana International Airport (TIJ) at Rodriguez Field is the commercial air carrier airport serving the Tijuana, Baja California region and is located in Mexico adjacent to the U.S.-Mexico border south of the Otay Mesa community. It provides services to commercial passenger air carrier, cargo, and general aviation aircraft. TIJ air traffic is directed to fly within Mexican airspace, but there is the potential for over flights that could affect land use and people within the City of San Diego. Gillespie Field is located in the city of El Cajon and operates general aviation aircraft which have a potential to affect land use and people in the City of San Diego west of the airport.

Existing Policies and Regulations

The state requires that the San Diego County Regional Airport Authority Board, as the Airport Land Use Commission (ALUC), prepare Airport Land Use Compatibility Plans for each public-use airport and military air installation in San Diego County. Prior to 2003, the San Diego Association of Governments served as the ALUC and adopted Comprehensive Land Use Plans (CLUPs) for SDIA, MCAS/NAS Miramar, Brown Field Municipal [Airport](#), and Montgomery Field [Municipal Airport](#) within the City as well as Gillespie Field [in El Cajon, McClellan-Palomar in Carlsbad, and Oceanside Municipal in Oceanside adjacent to the City](#).

In 2003, the Airport Authority was designated by the state as the ALUC for the county. In October 2004, the Airport Authority adopted amendments to the CLUPs and as part renamed them [to Airport Land Use Compatibility Plans \(ALUCPs\)](#). NAS North Island and NOLF Imperial Beach do not have adopted ALUCPs. In 2005, the Airport Authority released draft ALUCPs for all airports within the county. [In 2006, the Airport Authority adopted ALUCPs for the airports in the unincorporated area of the county](#). Currently, the Airport Authority is in the process of revising the draft ALUCPs for the airports within and adjacent to the City with a target adoption of [December 2007/2008](#). Since the revised draft ALUCPs [for the airports within and adjacent to the City](#) have not yet been prepared, the Draft General Plan EIR analysis is based on the adopted ALUCPs currently in place. Since the state requires that the ALUC adopt ALUCPs for airports within San Diego County, the Airport Authority is not drafting an ALUCP for the Tijuana International Airport.

An ALUCP contains policies and criteria that address compatibility between airports and future land uses that surround them by addressing noise, overflight, safety, and airspace protection concerns to minimize the public's exposure to excessive noise and safety hazards within the airport influence area for each airport over a 20-year horizon. [Figure 3.5-4 shows the airport influence area for each airport in the City](#). The 20-year horizon is based on information contained in a master plan or layout plan for an airport. Since the ALUC does not have land use authority, the City implements the ALUCPs through land use plans (General Plan, community plans, and specific plans), development regulations, and zoning ordinances.

When an ALUCP is amended or updated, the City, as the land use jurisdiction, is required to submit the land use plans that are within an airport influence area to the ALUC for a consistency determination. At the same time, when an action is proposed to amend or update a land use plan, airport plan (master plan or layout plan), development regulation, and/or zoning ordinance ([rezone](#)) within an airport-influence area, the City is required to submit these actions to the ALUC for a consistency determination prior to adoption of the action. The City can revise the proposed action to meet determination made by the ALUC or the City Council may overrule their determination by a two-thirds vote if it makes specific findings that the proposed action is consistent with the purposes of protecting public health, safety, and welfare, minimizing the public's exposure to excessive noise, and minimizing safety hazards within areas surrounding the airport. [Section 3.10 of this EIR addresses aircraft noise](#).

The City implements the adopted ALUCPs with the Airport Environs Overlay Zone (AEOZ). The AEOZ boundaries cover less area than the boundaries of the airport influence area. As such, the City [has agreed to](#) submit [discretionary projects](#) within the airport influence area for each airport in the City with an adopted ALUCP to the ALUC for consistency determinations.

The City is also in discussions with the Airport Authority regarding the types of ministerial projects within the airport influence area which should be submitted to the ALUC for consistency determinations. The City will submit development projects up until the time when the ALUC adopts the updated ALUCPs and subsequently determines that the City's affected land use plans are consistent with the ALUCPs. After which time, the City will only submit proposed amendments or updates to land use plans, airport plans, development regulations, and zoning ordinances within an adopted airport-influence area prior to final City Council approval as required by state law.

The adopted ALUCPs, with the exception of MCAS Miramar, do identify Runway Protection Zones (RPZs) (also referred to as flight activity zones). The RPZs are a trapezoidal area off the end of a runway end that serves to enhance the protection of people and property on the ground in the event an aircraft lands or crashes beyond the runway end. The RPZ for SDIA, Montgomery Field, and Brown Field are shown on **Figures 3.5-45, 3.5-56, and 3.5-67**. The size of the RPZ for each runway is determined by established Federal Aviation Administration (FAA) criteria. For RPZ that include non-airport property, the ALUCPs do identify compatible uses in the RPZs that are consistent with FAA guidelines for compatible land uses in a RPZ.

The adopted ALUCP for MCAS Miramar identifies Accident Potential Zones (APZs). The APZs are those areas that military aircraft routinely over fly that have higher potential for an aircraft accident or crash to occur. For MCAS Miramar, the APZs are incorporated in the adopted ALUCP from the Air Installation Compatible Use Zone (AICUZ) study published by the United States Navy in 1977 and updated in 1992. The size and location of the APZs are determined by Department of the Navy criteria. The APZs used by the adopted ALUCP currently in place affect property located off the MCAS Miramar property in the Mira Mesa, Torrey Pines and University communities as shown on **Figure 3.5-56**. The adopted ALUCP for MCAS Miramar identifies compatible uses and provides a safety land use/compatibility matrix criteria for future uses proposed in the APZs. The City uses the APZ boundaries to implement the safety land use/compatibility matrix criteria in the community plans for Mira Mesa, Torrey Pines, and University and the AEOZ.

In 2005, the United States Marine Corps released an updated AICUZ study for MCAS Miramar, which contains updated APZ boundaries, as shown on Figure 3.5-8, and a safety land use/compatibility matrix criteria. The matrix in the AICUZ study shows the land use compatibility criteria for proposed development projects within APZs. The federal government has Restrictive Use Easements (RUE) on property adjacent to MCAS Miramar that serve to limit the type and intensity of development as shown on Figure 3.5-8. Any proposed development requires adherence to specific RUE development conditions and should not be undertaken without concurrence from the United States Marine Corps.

As directed by state law, the Airport Authority will be incorporating the revised APZs into the updated ALUCP for MCAS Miramar. The Navy is also in the process of updating the AICUZ studies for NAS North Island and NOLF Imperial Beach. When published by the Navy, the Airport Authority will also be incorporating the APZs into the new ALUCPs for NAS North Island and NOLF Imperial Beach. **Figure 3.5-45** shows the APZs from the current 1984 AICUZ study for NAS North Island. **Figure 3.5-67** shows the APZs from the current 1989 AICUZ study for NOLF Imperial Beach.

Title 14 of the Code of Federal Aviation-Regulations (FAR) Part 77, Objects Affecting Navigable Airspace, establishes imaginary surfaces for airports and runways as a means to identify objects that are obstructions to air navigation. The FAA uses Part 77 and Terminal Instrument Procedures (TERPS) obstruction standards as elevations above which structures may constitute a safety problem. The Part 77 regulations require that anyone proposing to construct an object, which could affect the navigable airspace around an airport using the Part 77 notification criteria as shown in Table 3.5-2, submit information about the proposed construction to the FAA. Of the criteria listed in Table 3.5-2, proposed projects that exceed an imaginary 100:1 surface within 20,000 feet of a civilian or military airport or have a height exceeding 200 feet above ground level are the two of the more typical notification criteria that require project applicants to notify the FAA. For illustration purposes, **Figure 3.5-9** shows the imaginary 100:1 surface within 20,000 feet of a civilian or military airport that would affect land use in the City. Any proposed project having a height exceeding 200 feet above ground level at any location is required to notify the FAA.

When notified, The-the FAA then conducts an aeronautical study, the outcome of which is a determination as to whether the object would be a potential hazard to air navigation. The FAA examines the TERPS surfaces for obstructions and safety issues as part of the obstruction evaluation for a proposed project. If the proposed object is concluded to pose a hazard, the FAA may object to its construction and issue a determination of a hazard to air navigation, examine possible revisions of the proposal to eliminate the problem, require that the project be appropriately marked and lighted as an airspace obstruction, and/or initiate changes to the aircraft flight procedures for the airport so as to account for the object. In addition to structures that pose an airspace obstruction, land uses that create wildlife hazards, particularly related to birds, and land use characteristics that create visual or electronic interference with air navigation can create particular hazards to air navigation.

Table 3.5-2
Summary of the Part 77 Notification Criteria

- Any construction or alteration exceeding 200 ft above ground level
- Any construction or alteration:
 - within 20,000 ft of a public use or military airport which exceeds a 100:1 surface from any point on the runway of each airport with at least one runway more than 3,200 ft.
 - within 10,000 ft of a public use or military airport which exceeds a 50:1 surface from any point on the runway of each airport with its longest runway no more than 3,200 ft.
 - within 5,000 ft of a public use heliport which exceeds a 25:1 surface.
- Any highway, railroad or other traverse way whose prescribed adjusted height would exceed that above noted standards.
- When requested by the FAA.
- Any construction or alteration located on a public use airport or heliport regardless of height or location.

Source: FAA, Code Federal Regulations Title 14 Part 77.13

The FAA does not have the authority to prevent the encroachment; however, state law can prevent the encroachment if the FAA has made a determination of hazard to air navigation by requiring that project applicant obtain a permit from the California Department of Transportation. If the FAA has made a determination of hazard to air navigation, the ALUC requires that the project be submitted for a consistency determination with the applicable

~~ALUCP. In addition to structures that pose an airspace obstruction, land uses that create wildlife hazards, particularly related to birds, and land use characteristics that create visual or electronic interference with air navigation can create particular hazards to air navigation.~~

Although the ~~FAR~~-Part 77 imaginary surfaces for determining obstructions are incorporated into the adopted ALUCPs, the imaginary surfaces extend beyond the adopted airport influence area shown in the ALUCPs— projects that FAA determines to be a hazard to air navigation. The Airport Authority, servicing as the ALUC, has indicated that the updated ALUCPs will include the extent of the ~~FAR~~-Part 77 imaginary surfaces in the revised airport influence area.

For property surrounding SDIA, the City has adopted the Airport Approach Overlay Zone (AAOZ). The AAOZ provides supplemental regulations that help to ensure that: the FAA obstruction evaluation program and state law is being satisfied; the Airport Authority is provided the opportunity to participate in the evaluation process conducted by the FAA and the California Department of Transportation; and minimum vertical buffers are provided between the FAA-established approach path and structures constructed within the Airport Approach Overlay Zone.

3.5.2 Thresholds of Significance

A significant impact could occur if implementation of the General Plan:

- Exposes people or sensitive receptors to potential health hazards (e.g., exposing sensitive receptors to hazardous materials in Industrial areas or pesticides in areas of previous agricultural uses);
- Exposes people or structures to a significant risk of loss, injury, or death involving wildland fires, including when wildlands are adjacent to urbanized areas or where residences are intermixed with wildlands;
- Exposes people or structures to a significant risk of loss, injury or death involving flooding, including as a result of dam or levee failure;
- Exposes people or structures to a significant risk of loss, injury or death from seiche, tsunami, or mudflow;
- Exposes people or structures to a significant risk of loss, injury or death from aircraft operations accidents; or,
- Impairs implementation of, or physically interferes with an adopted emergency response plan or emergency evacuation plan.

3.5.3 Impact Analysis

Could implementation of the Draft General Plan expose people or sensitive receptors to potential health hazards (e.g., exposing sensitive receptors to hazardous materials in Industrial areas or pesticides in areas of previous agricultural uses)?

Implementation of the Draft General Plan will result in development of new residential, commercial, and industrial land uses in selected areas, which are or will be identified in community plans throughout the plan area. In recognition of the potential risks associated with hazardous materials, similar to existing City policies and regulations, the plan includes policies that direct the City to minimize risks associated with use of hazardous materials, to enforce zoning regulations applicable to businesses that use or manufacture hazardous materials, to monitor neighboring land uses for incompatibility, and to comply with existing federal, state, and county regulations regarding hazardous waste management.

The Draft General Plan allows for collocation of residential and industrial uses, which could expose sensitive receptors in residential areas to hazardous materials produced by industrial operations. This is a potentially significant impact. Conversion/Collocation Sustainability Factors (Appendix C of the Draft General Plan) address where residential and employment uses may be appropriately mixed. These factors include area character, transit availability, impacts on prime industrial land, significant residential components, residential support facilities, airport land use compatibility, public health, public facilities and adequate separation of uses which includes a maximum 1000-foot distance separation between industrial and residential properties or other sensitive receptor land uses with regard to hazardous or toxic air contaminants or hazardous or toxic substances. Sensitive receptors are described in the Draft General Plan as “land uses including residential, schools, child care centers, acute care hospitals, and long term care facilities.” These factors are to be used during discretionary project review, plan amendments and plan updates. |

Implementation of new base zone use packages, designed to provide new mixed-use zone categories will also address issues to avoid incompatible permitted uses within Industrial and Commercial zones. Existing and future regulations will also provide development standards aimed at reducing land use incompatibilities. As part of the community plan update process, opportunities for employment uses, as well as areas appropriate for locating workforce-housing opportunities near job centers will be identified. Collocation/Conversion Suitability Factors will be used to analyze compatibility of site specific proposals.

The above policies, along with adherence to federal, state, and local regulations pertaining to hazardous materials, serve to preclude or reduce significant impacts to a degree, but cannot guarantee that all future project level impacts will be avoided or mitigated to a level less than significant. Therefore, impacts associated with exposure of sensitive receptors to hazards are significant at the program level. Mitigation Framework Measures have been identified to reduce these program level impacts. Because the degree of impact and applicability, feasibility, and success of these measures cannot be adequately known for each specific project at this program level of analysis, the program level impact related to exposure of sensitive receptors to health hazards remains significant and unavoidable.

Development pursuant to implementation of the Draft General Plan could occur on contaminated sites located throughout the plan area as the City continues to grow. In accordance with City, state, and federal requirements, any new development that involves contaminated property will necessitate the clean up and/or remediation of the property in accordance with applicable requirements and regulations. No construction will be permitted to occur at such locations until

a “no further action” clearance letter from the Department of Environmental Health, or similar determination is issued by the City’s Fire Department, Department of Toxic Substances Control, Regional Water Quality Control Board (RWQCB), and/or other responsible agency. Compliance with existing regulations will ensure a level of safety to current standards.

Future development could lead to an increase in the number of Underground Storage Tanks (USTs) and thus, potentially more LUSTs. The RWQCB issues permits to operate USTs. The RWQCB is also responsible for monitoring the USTs and responding to requests to assess and remediate leaking tanks. Future commercial and industrial land uses that propose to install USTs will have to comply with all RWQCB policies. Based on continued oversight by the RWQCB for installation and operation of USTs, no significant impacts are anticipated with this issue.

Development pursuant to implementation of the Draft General Plan could occur on sites with idle, plugged, and abandoned wells. In accordance with state requirements, any new development on sites idle, plugged and abandoned wells will necessitate the clean up and/or remediation of the property in accordance with applicable state requirements and regulations. This may require that the wells be plugged or re-plugged to current state specifications. The state can order the reabandonment of previously plugged and abandoned wells when construction over or in the proximity of wells could result in a hazard (Section 3208.1 of the Public Resources Code). If abandonment or reabandonment is necessary, the cost of operations is the responsibility of the owner of the property upon which the development will be located. If development over an abandoned well is unavoidable, an adequate gas venting system should be placed over the well. If any plugged and abandoned or unrecorded wells are damaged or uncovered during excavation or grading, remedial plugging operations may be required. If such damage or discovery occurs, the state Department of Conservation, Division of Oil, Gas, and Geothermal Resources (DOGGR) must be contacted to obtain information on the requirements for and approval to perform remedial operations.

To ensure proper review of development projects, DOGGR has published an informational packet entitled, "Construction Project Site Review and Well Abandonment Procedure" that outlines the information a development applicant must provide to the DOGGR regarding projects with sites or in the proximity of sites with plugged and abandoned wells. No construction would be permitted to occur at such locations until that the City can verify that DOGGR has reviewed and cleared the development project. Based on continued oversight by the DOGGR of development on sites or in the proximity of sites with plugged and abandoned wells, no significant impacts are anticipated with this issue.

New development could result in the increased use, transport, and disposal volumes of hazardous materials within the Draft General Plan area. However, the current regulatory environment provides a high level of protection from the hazardous materials manufactured within, transported to and stored in industrial and educational facilities within the plan area. The City will continue to enforce disclosure laws that require all users, producers and transporters of hazardous materials and wastes to clearly identify the materials that they store, use or transport and to notify the appropriate City, county, state and federal agencies in the event of a violation. By recognizing these hazards and ensuring that an educated public can work with City officials to minimize risks associated with hazardous materials in the urban environment, the City can maintain safe

conditions area-wide. It is expected that compliance with existing regulations will preclude significant impacts.

Could implementation of the Draft General Plan expose people or structures to a significant risk of loss, injury, or death involving wildland fires, including when wildlands are adjacent to urbanized areas or where residences are intermixed with wildlands?

Wildland fires in undeveloped areas results from the ignition of accumulated brush and vegetation. Undeveloped portions of the Draft General Plan area have greater fire danger due to expansive areas of vegetation to fuel a fire. The plan area contains over 900 linear miles of wildland/urban interface due to the multitude of canyons throughout the area and development along the canyon ridgelines where structures meet natural vegetation. Because of this existing layout, around which many communities are formed, new development in the interface areas may expose additional people and structures to wildland fire hazards, representing a potentially significant impact.

Existing policies and regulations will help reduce, but not completely abate, the potential risks of wildland fires. The plan contains several goals and policies to be implemented by the City's Fire-Rescue Department, and through land use compatibility, training, sustainable development, and other measures, these goals and policies are aimed at reducing the risk of wildland fires. The City sponsors outreach and awareness programs to educate residents about fire dangers and what they can do to protect themselves and their homes. The Brush Management Guide was prepared after the devastating October 2003 fires in order to educate landowners about creating defensible space. This document highlights existing development code and educates landowners in better fire protection of their property through the clearing and thinning of flammable vegetation around homes and other structures.

Continued monitoring and updating of existing development regulations and plans will assist in creating defensible space and reduce, but not abate, the impact of wildfire threat on the structures. To the extent possible, growth and development should be located away from known High Fire Hazard areas as depicted on **Figure 3.5-23**. Public education, and firefighter training, support, and emergency operations efforts will reduce the risks of impacts involving wildfires; but cannot guarantee that all future project level impacts will be avoided or mitigated to a level less than significant. Therefore, impacts associated with wildfires are significant at the program level. Mitigation Framework Measures have been identified to reduce these program level impacts. Because the degree of impact and applicability, feasibility, and success of these measures cannot be adequately known for each specific project at this program level of analysis, the program level impact related to wildfire hazards remains significant and unavoidable.

Could implementation of the Draft General Plan expose people or structures to a significant risk of loss, injury or death involving flooding, including as a result of dam or levee failure?

Several FEMA Special Flood Hazard Areas are located in the Draft General Plan area. These areas, corresponding to the 100-year floodplain, have the potential to become flooded when major rainstorms cause streams to overflow, or spillovers at dams upstream occur. Areas within the 100-year floodplain in Mission Valley are designated for a variety of uses, including residential, commercial and industrial uses. The development of additional residential and business-related uses in this area must comply with existing programs aimed to reduce flooding

hazards. Other flood hazard areas include land surrounding the Otay River, South Bay National Wildlife Refuge, Los Peñasquitos Creek, and San Dieguito River, though these areas are predominantly reserved for Open Space preservation and would not contribute to the impact of flooding hazards on people or structures.

All dams are required by the state of California to be inspected for safety, including capacity to not fail during a major seismic event. Such studies have been conducted for all City-operated reservoirs and dams and with reinforcing materials or modern seismic-resistant building standards where appropriate, all are found to be capable of withstanding a significant seismic event. The El Capitan reservoir, which is upstream of the San Diego River watershed area including Mission Valley, is required to maintain the water level at 30 feet below the spillway. In the unlikely event of dam inundation due to severe seismic activity or other events, some warning time would allow for resident evacuation and the City's Emergency Operations Plan would take effect, though water could distribute over a normal floodplain resulting in significant damage to property. Still, the probability of seismically induced failure is very low, and the probability of a major earthquake when the reservoirs are full is lower still. Therefore, with continued evaluation of dam stability and compliance with state regulations, impacts associated with dam inundation are not expected to occur.

Development occurring during implementation of the General Plan could locate near the water bodies mentioned above which could create a significant impact related to flood hazards; however such projects must be developed in accordance with regulations governing special flood hazard areas. Most of the development which would occur, however, would likely be sited in areas that are not susceptible to flooding and would not be subject to significant impacts related to flood hazards.

Currently, the City participates in the National Flood Insurance Program and enforces its Land Development Code regulations through prohibitive regulations or mitigation measures regarding development in the floodplain and floodway. The Draft General Plan's Conservation Element contains policies which aim to preserve the natural attributes of the floodplain and floodway without endangering persons or structures. Specific policies identified in the Draft General Plan aim to improve public education programs, minimize runoff generated on-site, and manage floodplains to address their multi-purpose use.

These actions, in conjunction with compliance with existing federal, state, and local regulations and plans, are expected to result in less than preclude significant impacts associated with flooding.

Could implementation of the Draft General Plan expose people or structures to a significant risk of loss, injury or death from seiche, tsunami, or mudflow?

A seiche is a standing wave in an enclosed or partially enclosed body of water which results from the rhythmic oscillation of water due to meteorological events, earthquakes or tsunamis. When large enough, they can damage shoreline vessels or structures through the rise and fall of the water. While seiches are common and natural in the Draft General Plan area, they usually are undetectable due to low periods, depths and lengths of the local bodies of water. A geologic or other natural event of an unprecedented scale for the region would be required to induce a seiche capable of significant damage; at the same time, existing regulations and development codes would ensure that waterfront development would withstand a seiche, should one occur.

A tsunami is a series of waves caused by large scale displacement of water, usually under the

ocean, as a result of a massive underwater disturbance such as an earthquake, volcanic eruption, or other explosion. In the San Diego region, a large earthquake (magnitude >7.0) along the underwater San Diego Trough fault system could occur and the region has record of large seafloor uplift at fault bends which may have generated local tsunamis. However, these are theoretical predictions and the probability of a large-scale earthquake capable of inducing a local tsunami remains low. Tsunamis are also capable of traveling thousands of miles from the origin of an event, but historical records have demonstrated that large tsunamis generated in Hawaii, Alaska or elsewhere would have lost most of their destructive energy due to the length of travel, the continental shelf off the coast of Southern California, Channel Islands which would act as buffers to the waves, and inward curvature of the Southern California coastline. Furthermore, should a smaller tsunami reach the Draft General Plan area, existing regulations and protective structures enhance the structural integrity of coastal development, and federal emergency notification plans would assist people in affected areas in successful evacuation and avoidance of tsunamis.

Mudflows result from steep hillside soils becoming rapidly saturated with water, extensive erosion, and/or a large disturbance on the hillside such as an earthquake or boulder collapse. While the potential for this event to occur in the hillsides of the Draft General Plan area is significant, existing development guidelines and other regulations ensure that population and development would not occur in high hazard areas. Furthermore, it is expected that continual monitoring of areas potentially affected by mudflows and updating of emergency response procedures will preclude significant health and safety impact of mudflows.

Development that may occur during implementation of the General Plan that is located near major water bodies could potentially be affected by seiche or tsunami. Similarly, development near foothills, at the base of steep canyon hillsides or other landslide-prone areas could potentially be affected by mudslide. This is a potentially significant impact. Current regulations, development code, and emergency management plans would ensure that the potential impact of these natural disasters on people and structures within the plan area will not be substantial and will be less than significant. The continual review and updating of these documents and regulations would further reduce potential impacts.

Could implementation of the Draft General Plan expose people or structures to a significant risk of loss, injury or death from off-airport aircraft operations accidents?

The regional forecasted growth in population and the economy, which is based on the City's adopted land use policies, would affect the potential demand for aviation services at SDIA and general aviation airports within the City, but only up to the capacity for each airport as stated in its respective airport master plan or layout plan. For military air installations, unforeseeable world events may affect future changes in military operations beyond current operation levels.

The future development of incompatible uses in areas subject to off-airport air crash hazards could substantially increase the risk of loss of lives and property. To prevent incompatible uses in areas of higher aircraft hazard potential, the ALUC has adopted ALUCPs with land use policies and criteria in the interest of public safety. Such land use policies and criteria also help to ensure the long-term utility of the airport.

The proposed Draft General Plan and existing community plan policies address incompatible uses in areas with a greater potential for accidents as identified in the adopted ALUCPs. As required by state law, the City will submit the Draft General Plan to the ALUC for a consistency

determination with the adopted ALUCPs. If the ALUC requires revisions to the General Plan for a determination of consistency, the City can make the revisions to meet determination made by the ALUC. Under state law, the City Council may overrule the ALUC determination by a two-thirds vote if it makes specific findings that the proposed action is consistent with the purposes of protecting public health, safety, and welfare, minimizing the public's exposure to excessive noise, and minimizing safety hazards within areas surrounding the airport.

In preparing the updated ALUCPs, the ALUC will provide updated policies and criteria for compatible land uses in areas with a greater potential for accidents. Any future adoption of the updated ALUCPs will require the City to submit the General Plan, community plans and specific plans within the airport influence areas to the ALUC for consistency determinations. To ensure consistency with the adopted ALUCPs, the City will ~~continue to submit discretionary~~ projects within the airport influence area for each airport in the City with an adopted ALUCP to the ALUC for consistency determinations up until the time when the ALUC adopts the updated ALUCPs and subsequently determines that the City's affected land use plans are consistent with the ALUCPs or the City Council overrules the ALUC determination.

In order to implement the policies and criteria contained in the updated ALUCPs, the City will need to coordinate with the ALUC to update development regulations and zoning ordinances where applicable. This will also include ALUCP policies and criteria addressing the ~~FAR~~-Part 77 imaginary ~~and TERPS~~ surfaces. After which time, the City will only submit proposed amendments or updates to land use plans, airport plans, development regulations, and zoning ordinances within an adopted airport influence area prior to City Council approval as required by state law. To prevent the development of structures that may pose a hazard to air navigation, the City will ~~also~~ inform development project applicants concerning the existence of the ~~FAR~~-Part 77 imaginary ~~and TERPS~~ surfaces and FAA requirements. The City will also inform project applicants when proposed projects meet the Part 77 criteria for notification to the FAA as identified in City of San Diego Development Services Department Information Bulletin 520. The City will not approve ministerial projects that require FAA notification without a FAA determination of "No Hazard to Air Navigation" for the project. The City will not recommend approval for discretionary projects that require FAA notification without a FAA determination of "No Hazard to Air Navigation" for the project until the project can fulfill state and ALUC requirements. beyond the airport influence area shown in the adopted ALUCPs.

The City implements the adopted ALUCPs with the Airport Environs Overlay Zone (AEOZ). The AEOZ boundaries cover less area than the boundaries of the airport influence area, which could allow the development of future projects that could pose a potentially significant impact outside of the AEOZ boundaries, but within the airport influence area. ~~As a mitigation measure,~~ The City will continue to submit discretionary projects within the airport influence area for each airport in the City with an adopted ALUCP to the ALUC for consistency determinations. The City will work with the Airport Authority to identify the types of ministerial projects within airport influence areas to submit to the ALUC for consistency determinations. The City will continue to submit development projects up until the time when the ALUC adopts the updated ALUCPs ~~and . After the ALUC adoption of the updated ALUCPs, the City will submit future projects located in an airport influence area until the ALUC subsequently~~ determines that the City's affected land use plans, development regulations, and zoning ordinances are consistent

with the ALUCPs. This action will assist in ensuring that future structures located in an airport influence area do not pose potentially significant safety or health impact to people on the ground to the extent that the adopted ALUCPs contain policies and criteria that prevent the future development of incompatible land uses and structures.

The City Council may overrule the ALUC determination by a two-thirds vote if it makes specific findings that the proposed action is consistent with the purposes of protecting public health, safety, and welfare, minimizing the public's exposure to excessive noise, and minimizing safety hazards within areas surrounding the airport as addressed in Public Utilities Code section 21670. The overrule of an ALUC determination can apply to individual development projects as well as land use plans, development regulations, and zoning ordinances submitted to the ALUC. Since a City Council overrule of the ALUC determination will not be consistent with the ALUCP, it may result in potentially significant land use and planning impacts as a result of the potential conflicts between the ALUCPs, and more importantly, it may result in the creation of physical impacts associated with new incompatible land uses.

By state law, the City will submit the Draft General Plan, prior to adoption by the City Council; to the ALUC for determine if the draft General Plan is consistent with the adopted ALUCPs. If determined to be consistent by the ALUC, the implementation of the General Plan policies that address airport land use compatibility will support the development of future uses consistent with the adopted ALUCP and preclude any health and safety impact of off-airport aircraft accidents. If the ALUC determines that the General Plan is not consistent and the City Council takes the necessary steps to overrule the ALUC, then this action could result in a potentially significant impact to health and safety. Even if the ALUC determines that the General Plan is consistent, the ~~FAR~~ Part 77 imaginary surfaces may extend beyond the boundaries of the Airport Influence Area and the adopted zoning ordinances and development regulations could cause the development of future structures that could pose a potentially significant impact to health and safety. The eventual adoption of the updated ALUCPs by the ALUC for airports affecting land uses in the City as well as the City subsequently taking actions to amend its land use plans, zoning ordinances, and development regulations to be consistent with the updated ALUCPs for the purposes of implementing the ALUCP policies and criteria will reduce this potential impact to a less than significant level.

Although the actions that the City will need to take to be consistent with the ALUCP may result in potentially significant land use and planning impacts as a result of the potential conflicts between the ALUCPs and the General Plan, land use plans, zoning ordinances, and development regulations, the implementation of the ALUCPs may, more importantly, avoid the creation of physical impacts associated with new incompatible land uses. The ALUCPs do not address existing structures or uses that could be incompatible or considered a hazard and therefore these existing uses and structures even after the steps take by the City to implement the ALUCPs would continue to be a potential significant impact. While the ALUCPs contain policies and criteria to limit future incompatible uses and safety impacts, they cannot prevent aircraft accidents from occurring such as a loss of power after takeoff. Therefore, implementation of the Project has the potential to create significant and unavoidable impacts from off-airport aircraft operation accidents which exceeds the existing risk conditions.

Could implementation of the Draft General Plan impair implementation of, or physically

interfere with an adopted emergency response plan or emergency evacuation plan?

Growth and development that would occur as a result of implementation of the plan would result in greater demands on the successful execution of emergency evacuation plans. This could create a potentially significant impact on the implementation of emergency plans. Improved roadway and transportation modifications that are analyzed in **Section 3.15** of this EIR would directly help traffic flow and evacuation time. The ongoing implementation and updating of the City of San Diego's Emergency Operations Plan would assure adequate response to emergencies as growth occurs, and reduce the potential for interfering with emergency plans. In addition, the City would continue to cooperate with federal and state emergency preparedness agencies. The City would also continue to conduct drills and training simulations for the EOC to assure improved operation in the event of an actual disaster.

3.5.4 Mitigation Framework

Goals, policies, and recommendations enacted by the City, combined with the federal, state and local regulations described above, provide a framework for developing project level health and safety protection measures for future discretionary projects. The City's process for the evaluation of discretionary projects includes environmental review and documentation pursuant to CEQA as well as an analysis of those projects for consistency with the goals, policies and recommendations of the General Plan. In general, implementation of the above policies would preclude health and safety impacts. Compliance with the standards is required of all projects and is not considered to be mitigation. However, it is possible that for certain projects, adherence to the regulations may not adequately protect health and safety, and such projects would require additional measures to avoid or reduce significant health and safety impacts. These additional measures would be considered mitigation.

For each future discretionary project requiring, mitigation (i.e., measures that go beyond what is required by existing regulations), site-specific measures will be identified that reduce significant project-level impacts to less than significant or the project level impact may remain significant and unavoidable where no feasible mitigation exists. Where mitigation is determined to be necessary and feasible, these measures will be included in a Mitigation Monitoring and Reporting Program (MMRP) for the project.

Below is a summary of general measures that may be implemented to preclude impacts. These measures may be updated, expanded and refined when applied to specific future projects based on project-specific design and changes in existing conditions, and local, state and federal laws. Mitigation Framework Measures include:

- Future projects locating non-residential employment uses in proximity to residential development or vice versa must be sited and designed in a manner that reduces or avoids potential health and safety incompatibility impacts. The Conversion/Collocation Suitability Factors (located in Appendix C of the Draft General Plan) will be used to analyze compatibility of site specific proposals.
- Future projects located in known High Fire Hazard Areas must be sited and designed to minimize impacts of fire. Prior to approval of any entitlement for a future project, the

City will identify any impacts from wildfire or landslides and measures to preclude or substantially reduce such impacts in accordance with the requirements of the City of San Diego. Fire protection measures may include creating “defensible space” by:

- Pruning trees and shrubs nearby structures.
 - Watering areas near structures regularly.
 - Moving most native vegetation away from structures.
 - Removing or thinning natural vegetation up to 100 feet from structures.
- Future discretionary projects located in an airport influence area will be submitted to the ALUC for consistency determinations with the adopted ALUCPs up until the time when the ALUC adopts the updated ALUCPs. After the ALUC adoption of the updated ALUCPs, the City will submit future projects located in an airport influence area until the ALUC determines that the City’s affected land use plans, development regulations, and zoning ordinances are consistent with the ALUCPs. Amendments to land use plans, development regulations, and zoning ordinances that are within an airport influence area must be submitted the ALUC prior to adoption.

3.5.5 Significance of Impact with Mitigation Framework

The potential for exposure of sensitive receptors to health hazards and wildfires is considered significant and unavoidable at the program level.

Impacts associated with flooding, seiche, tsunami and mudflows, as well as potential conflicts with emergency operations plans, will be less than significant, are expected to be precluded.

The implementation of the General Plan policies that address airport land use compatibility support the development of future uses that are consistent with the adopted ALUCP. Following the mitigation framework identified above and these policies, will ensure that the health and safety impacts of off-airport aircraft accidents will be less than significant, is precluded. The City implements the adopted ALUCPs within the Airport Environs Overlay Zone (AEOZ). The AEOZ boundaries cover less area than the boundaries of the airport influence area, which could allow the development of future projects that could pose a potentially significant impact to health and safety outside of the AEOZ boundaries. As a mitigation measure, the The City will continue to submit discretionary projects within the airport influence area for each airport in the City with an adopted ALUCP to the ALUC for consistency determinations up until the time when the ALUC adopts the updated ALUCPs. After the ALUC adoption of the updated ALUCPs, the City will submit future projects located in an airport influence area. The City will work with the Airport Authority to identify the types of ministerial projects within airport influence areas to submit to the ALUC for consistency determinations. The City will continue to submit development projects until the ALUC determines that the City’s affected land use plans, development regulations, and zoning ordinances are consistent with the ALUCPs. The City will either amend the AEOZ or the adoption of new a new overlay zone to be consistent with the airport influence area boundaries after the ALUC adopts updated ALUCPs. Amendments to land

use plans, development regulations, and zoning ordinances that are within an airport influence area must be submitted the ALUC prior to adoption.

The ~~FAR~~ Part 77 imaginary surfaces for determining obstructions may extend beyond the boundaries of the Airport Influence Area and the adopted zoning ordinances and development regulations could cause the development of future structures that could pose a potentially significant impact to health and safety. ~~As a mitigation measure, the~~ The City will map the FAR Part 77 notification area in the City's geographic information system and use it to inform project applicants when they may need to notify the FAA of a proposed structure. inform project applicants when proposed projects meet the Part 77 criteria for notification to the FAA as identified in City of San Diego Development Services Department Information Bulletin 520. The City will not approve ministerial projects that require FAA notification without a FAA determination of "No Hazard to Air Navigation" for the project. The City will not recommend approval for discretionary projects that require FAA notification without a FAA determination of "No Hazard to Air Navigation" for the project until the project can fulfill state and ALUC requirements.

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THE CITY OF SAN DIEGO
General Plan

Program Environmental
Impact Report

Pacific Ocean

San Diego Bay

MEXICO

Figure 3.5-1

Oil & Gas Wells

Drilling-Idle

2 Plugged & Abandoned Dry Hole



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Figure 3.5-2

Flood Hazard Areas

-  100 Year Floodplain
-  Dam Inundation Areas



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Pacific Ocean

Figure 3.5-3

High Fire Risk Areas

 High Fire Risk Areas

 Coastal Zone

(Includes 300 foot buffer area beyond zone II)



0 1 2 4 6 Miles

San Diego Bay

MEXICO



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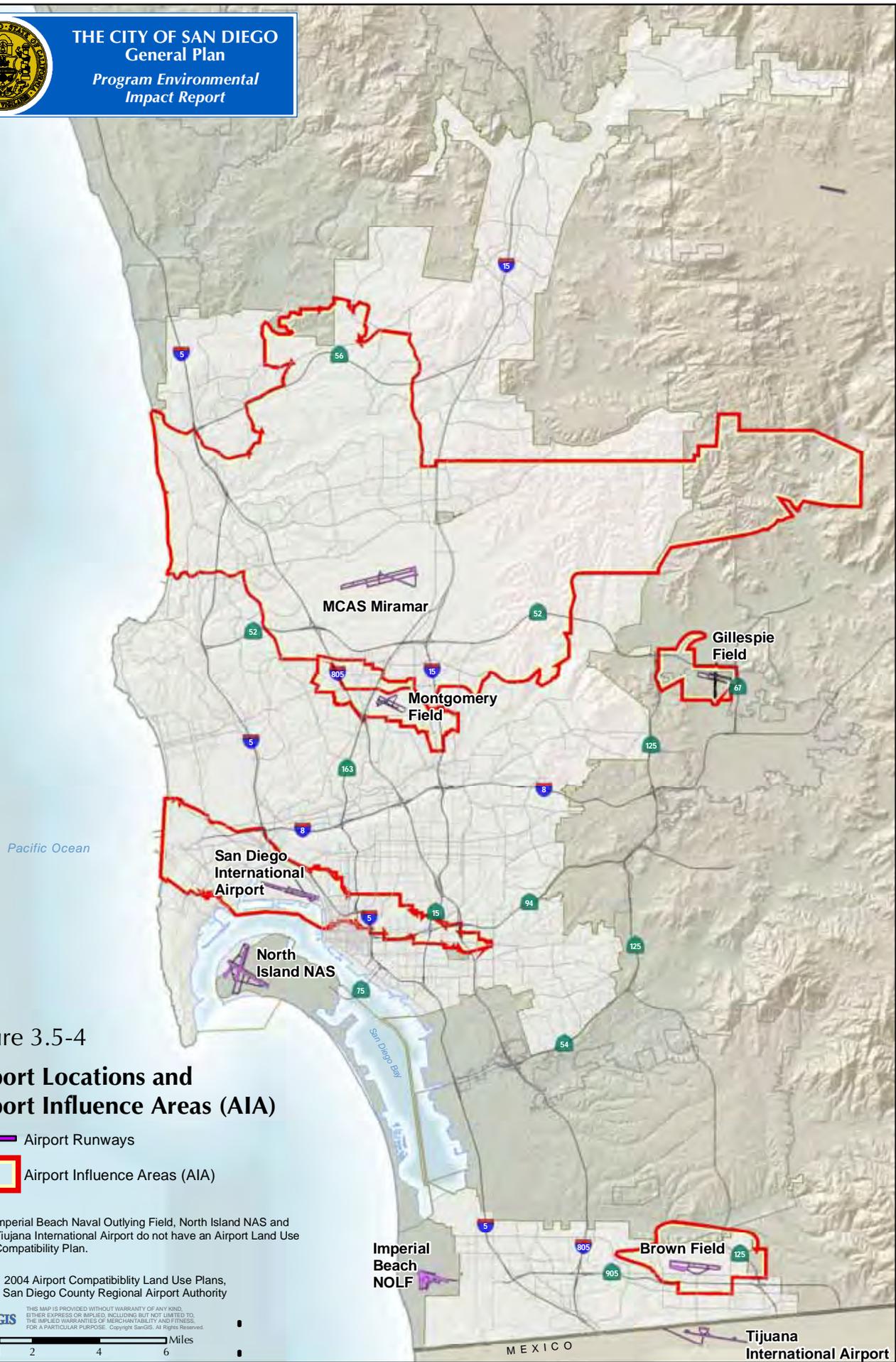


Figure 3.5-4
Airport Locations and
Airport Influence Areas (AIA)

-  Airport Runways
-  Airport Influence Areas (AIA)

Note: Imperial Beach Naval Outlying Field, North Island NAS and Tijuana International Airport do not have an Airport Land Use Compatibility Plan.

Source: 2004 Airport Compatibility Land Use Plans, San Diego County Regional Airport Authority

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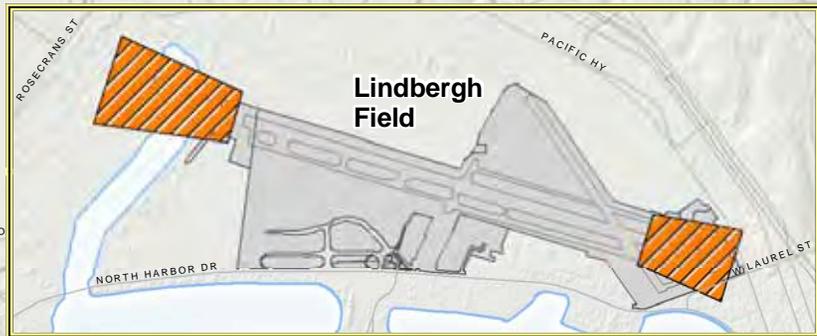
0 1 2 4 6 Miles

MEXICO

Tijuana International Airport



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Pacific Ocean

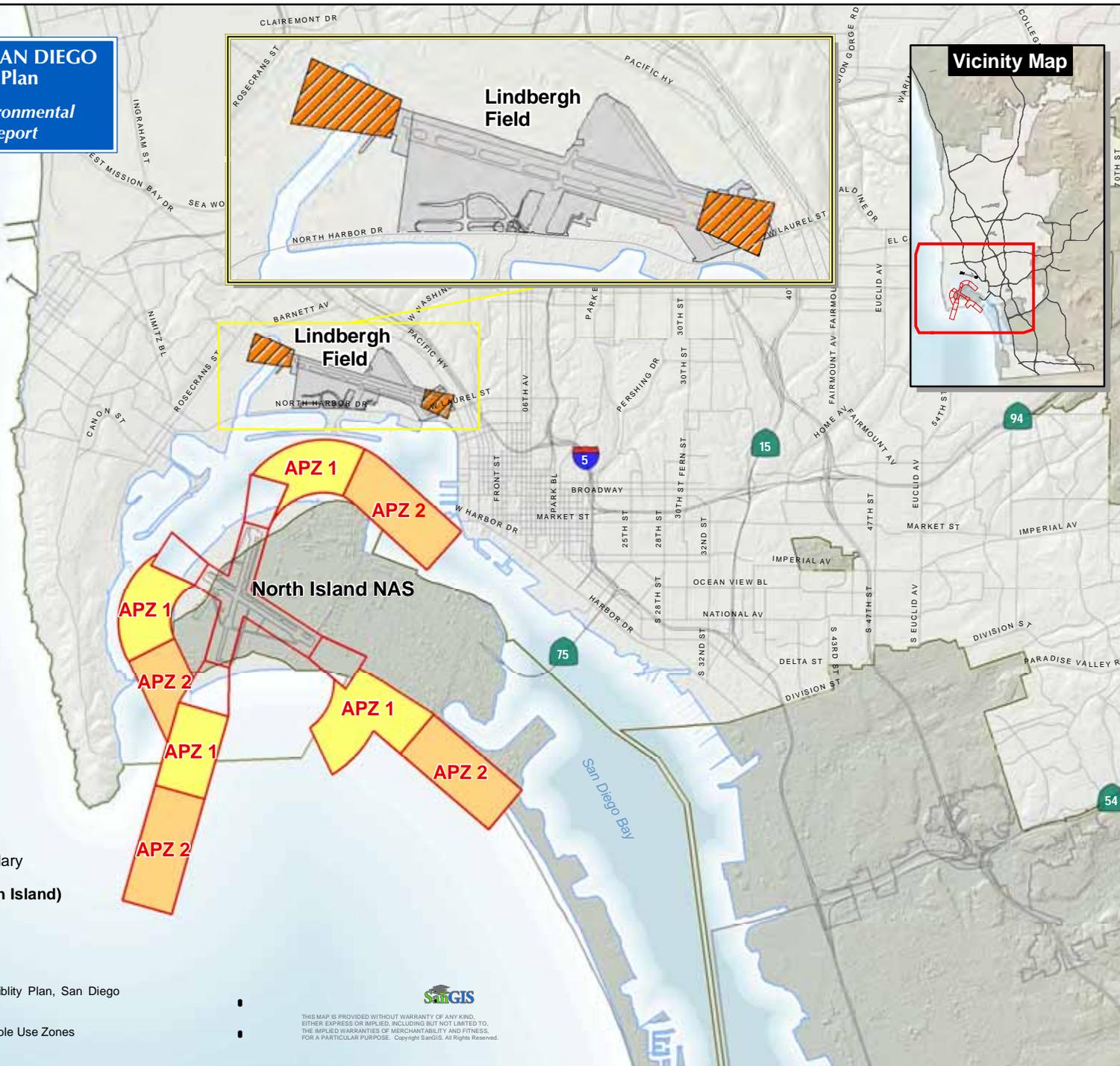


Figure 3.5-5
**San Diego International
 Airport-Lindbergh Field
 and NAS North Island
 Safety Areas**

Safety Areas (Lindbergh Field)

-  Runway Protection Zone
-  Lindbergh Field Property Boundary

Accident Potential Zones (NAS North Island)

-  APZ 1
-  APZ 2

Source: Adopted 2004 Airport Land Use Compatibility Plan, San Diego County Regional Airport Authority.

Source: NAS North Island Air Installations Compatible Use Zones (January 1984)



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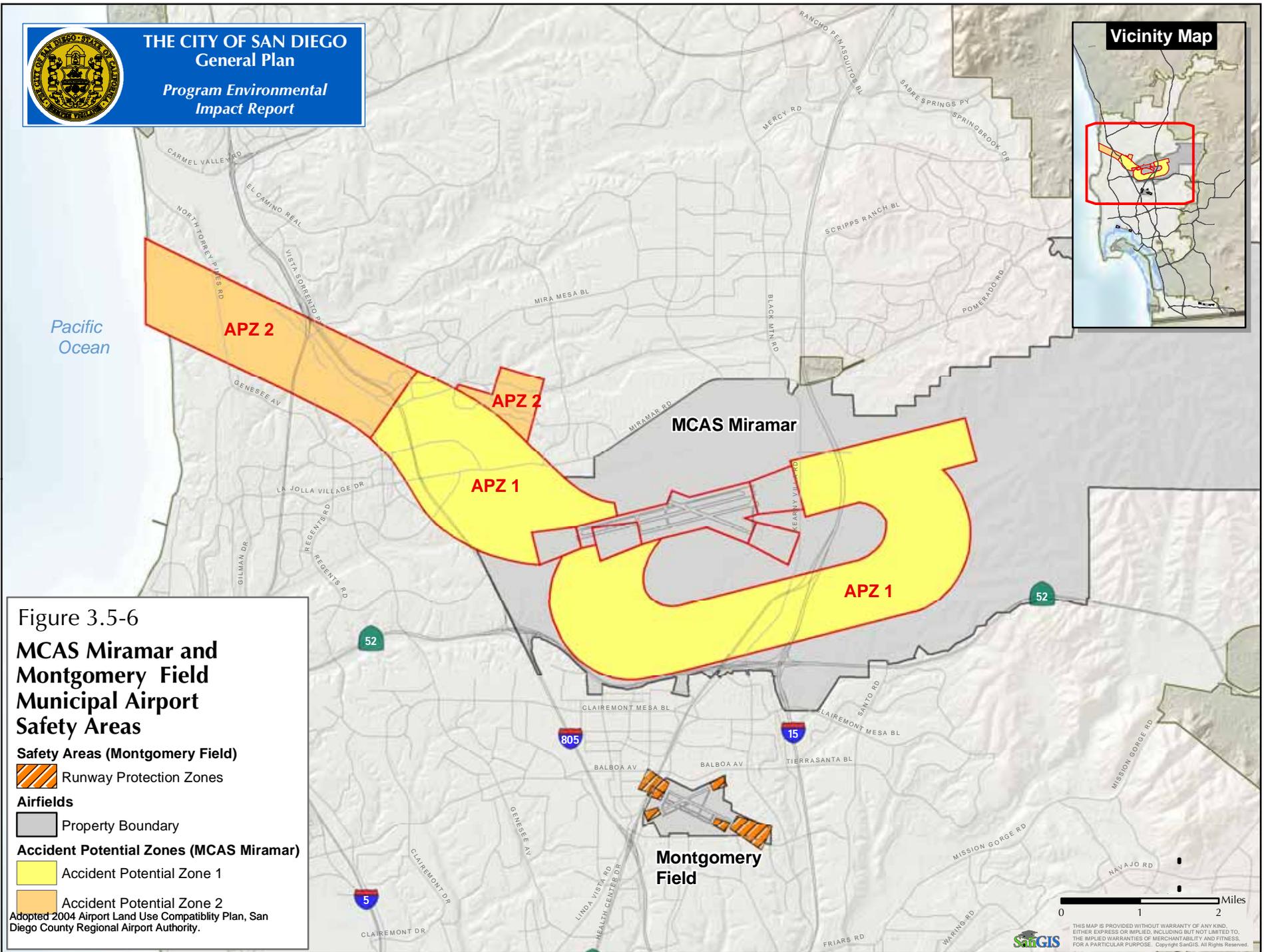
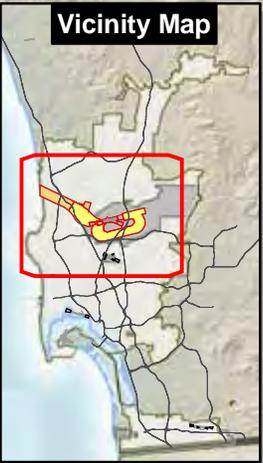


Figure 3.5-6
**MCAS Miramar and
 Montgomery Field
 Municipal Airport
 Safety Areas**

- Safety Areas (Montgomery Field)**
- Runway Protection Zones
- Airfields**
- Property Boundary
- Accident Potential Zones (MCAS Miramar)**
- Accident Potential Zone 1
 - Accident Potential Zone 2

Adopted 2004 Airport Land Use Compatibility Plan, San Diego County Regional Airport Authority.



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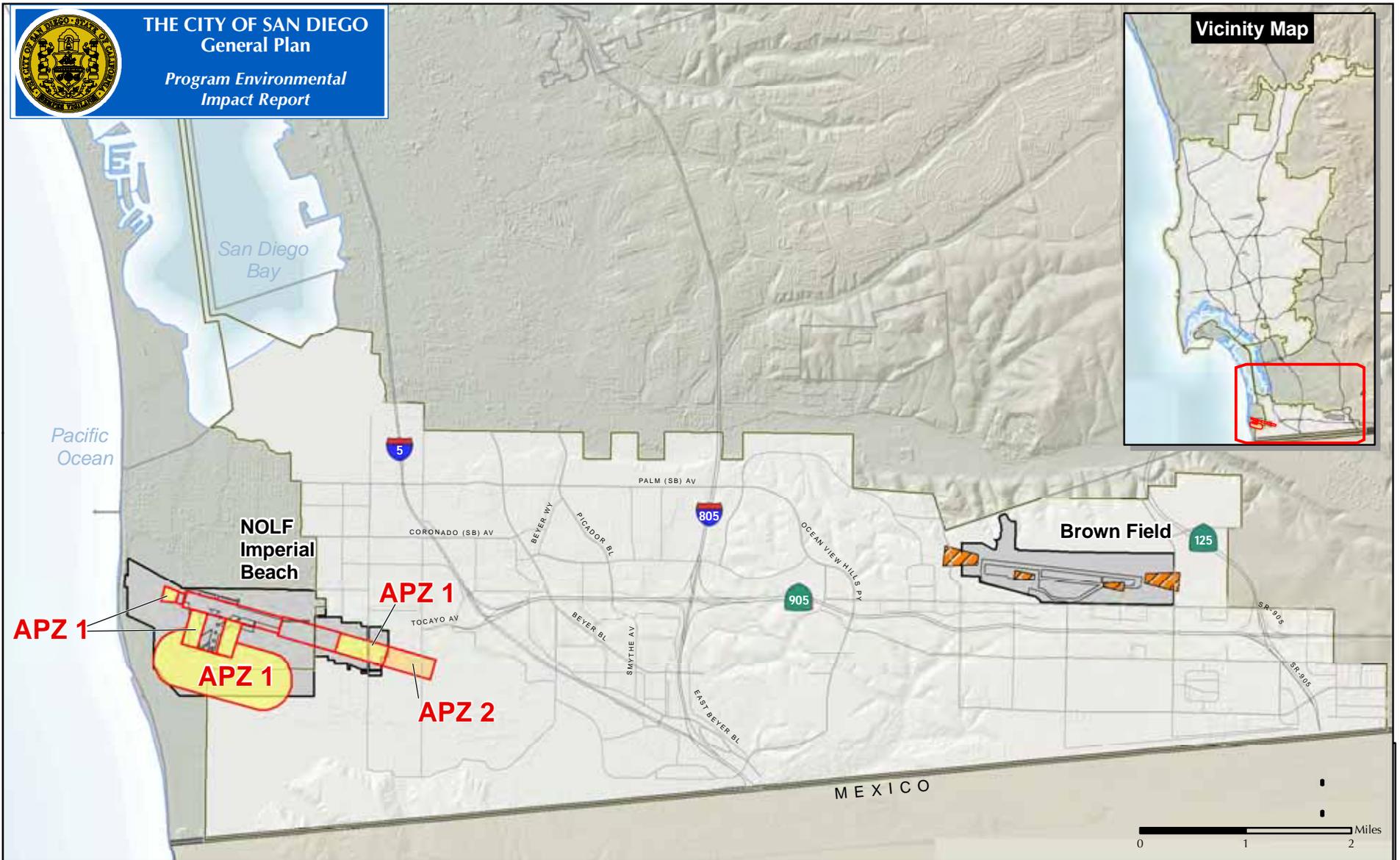


Figure 3.5-7
Brown Field Municipal Airport
and Naval Outlying Field Imperial Beach
Safety Areas

Safety Areas (Brown Field)

Runway Protection Zone

Airfields

Property Boundary

Accident Potential Zones (NOLF Imperial Beach)

Accident Potential Zone 1

Accident Potential Zone 2



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Sources: Air Installation Compatible Use Zone Study, 1989, United States Navy.

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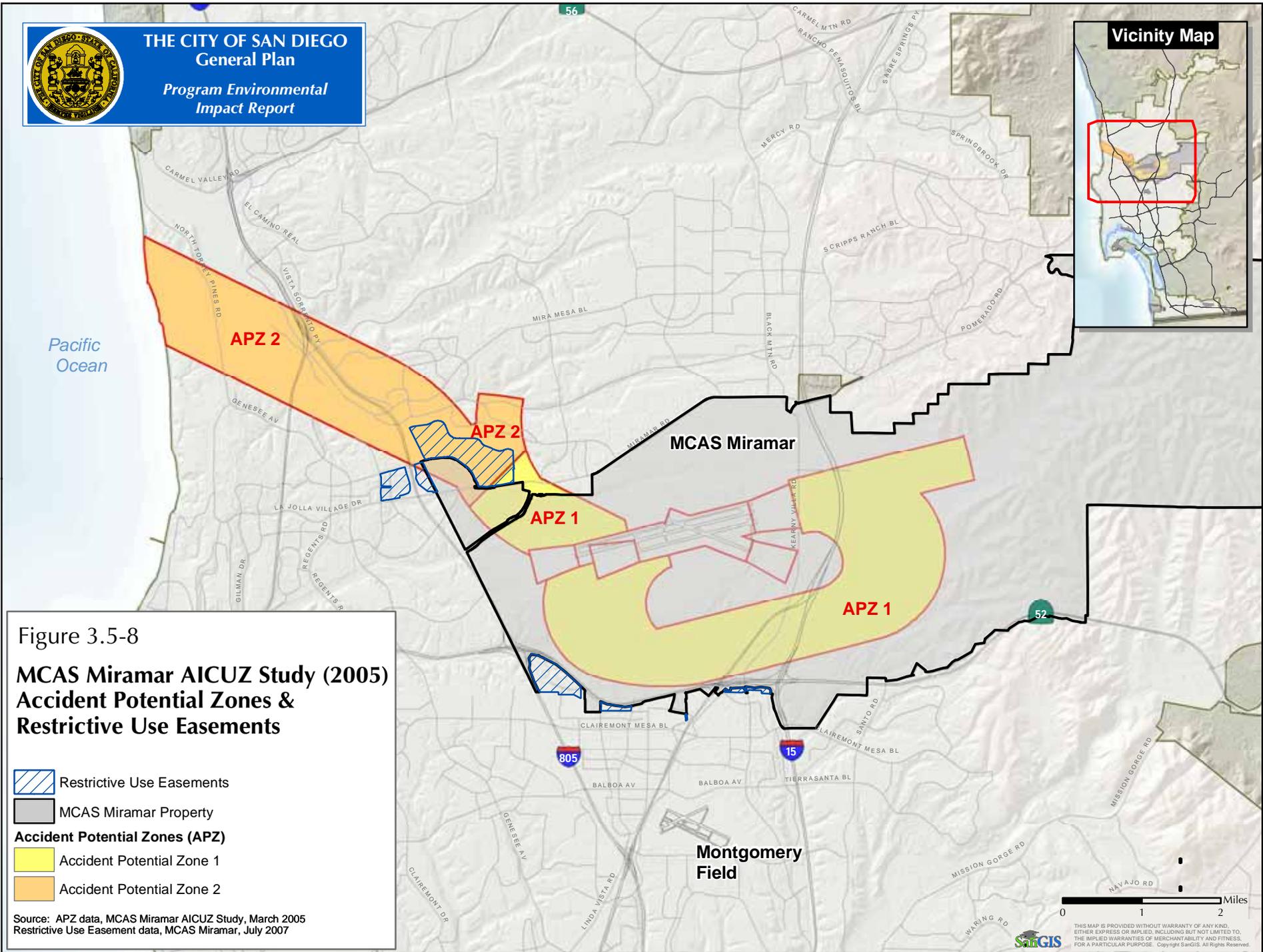
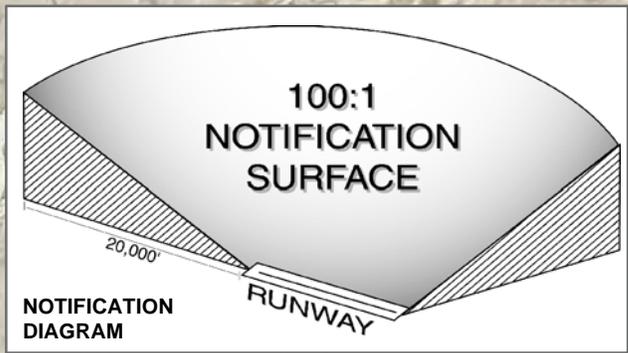


Figure 3.5-8
MCAS Miramar AICUZ Study (2005)
Accident Potential Zones &
Restrictive Use Easements

-  Restrictive Use Easements
-  MCAS Miramar Property
- Accident Potential Zones (APZ)**
-  Accident Potential Zone 1
-  Accident Potential Zone 2

Source: APZ data, MCAS Miramar AICUZ Study, March 2005
 Restrictive Use Easement data, MCAS Miramar, July 2007



Pacific Ocean

MCAS Miramar

Montgomery
Field

Gillespie
Field

San Diego
International
Airport

North
Island NAS

Imperial
Beach
NOLF

Brown Field

Tijuana
International Airport

Figure 3.5-9

**Code of Federal Regulations,
Title 14, Part 77
Noticing Surfaces (100:1)**

 Federal Aviation Administration
Noticing Surfaces (100:1)

Notes:

FAA Noticing Surface shown here represent the 100:1 imaginary surfaces that extend 20,000 feet horizontally from each runway at a civilian or military airport.

This map is for illustrative purposes only. Refer to the CFR Part 77 for the applicable FAA noticing regulations and criteria.

Data Source:

Federal Aviation Administration, www.oaava.faa.gov
July 15, 2007

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0 1 2 4 6 Miles

MEXICO

3.6 HISTORICAL RESOURCES

3.6.1 Existing Conditions

Historical resources (also referred to as cultural resources) are physical features, both natural and constructed, which reflect past human existence and are of historical, archaeological, scientific, educational, cultural, architectural, aesthetic, or traditional significance. These resources may include such physical objects and features as archaeological sites and artifacts, buildings, groups of buildings, structures, districts, street furniture, signs, and landscapes. Also included are distinguishing architectural characteristics and traditional cultural properties. Historical resources in the San Diego region span a timeframe of at least the last 10,000 years and include both the prehistoric and historic periods.

Prehistoric Periods

The prehistory of the region is evidenced through archaeological remains representing up to 10,500 years of Native American occupation. The [myths-Creation Story](#) and history that is repeated by the local Native American groups, now and at the time of earlier ethnographic research, indicate both their presence here since the time of creation and, in some cases, migration from other areas. The earliest archaeological remains in San Diego County are believed by some investigators to represent a nomadic hunting culture characterized by the use of a variety of scrapers, choppers, bifacially worked stone tools, large projectile points and crescentics, a scarcity or absence of milling implements, and a preference for fine-grained volcanic rock over metaquartzite materials. A gathering culture which subsisted largely on shellfish and plant foods from the abundant littoral (near shore) resources of the area is seen in the archaeological record dating from about 6000 BC to AD 0. The remains from this time period include stone-on-stone grinding tools (mano and metate), relatively crude cobble-based flaked lithic technology and flexed human burials.

The Late Prehistoric Period (AD 0 to 1769) in the City of San Diego is represented by the people ancestral to the Kumeyaay people of today. Prehistorically, the Kumeyaay were a hunting and gathering culture that adapted to a wide range of ecological zones from the coast to the Peninsular Range. A shift in grinding technology reflected by the addition of the pestle and mortar to the mano and metate, signifying an increased emphasis on acorns as a primary food staple, as well as the introduction of the bow and arrow, pottery, obsidian from the Obsidian Butte source in Imperial County, and human cremation serve to differentiate Late Prehistoric populations from earlier people in the archaeological record.

The ethnohistoric period began locally about 1769 with the Spanish colonization of Alta California. The establishment of the mission system brought about profound changes in the lives of the Yuman-speaking Kumeyaay people. The greatest impact was felt by the Native Americans living in the coastal areas where the mission influence was the greatest. As a result ethnohistoric accounts of the coastal Kumeyaay are few and the information pertains largely to the people living in the mountain and desert regions. The ethnohistoric Kumeyaay were generally a hunting and gathering society characterized by nomadism from a central base. Their houses varied greatly according to locality, need, choice and raw materials. Formal homes, built

in winter, were small huts of poles covered with brush or bark. In cold weather, the brush was covered with earth to help conserve heat. In summer, windbreaks were all that were needed. Village-owned structures were ceremonial and were the center of many activities. Sweathouses were built and used by the Kumeyaay men.

Historic Period

San Diego history can be divided into the Spanish Period (1769-1821), Mexican Period (1821-1846) and American Period (1846-Present). In spite of Juan Cabrillo's earlier landfall on Point Loma in 1542, the Spanish colonization of Alta California did not begin until 1769 with the founding of Mission San Diego de Alcalá by Father Junípero Serra. Concerns over Russian and English interests in California motivated the Spanish government to send an expedition of soldiers, settlers and missionaries to occupy and secure the northwestern borderlands of New Spain through the establishment of a Presidio, Mission, and Pueblo. The Spanish explorers first camped on the shore of the bay in the area that is now downtown San Diego. Lack of water at this location, however, led to moving the camp on May 14, 1769 to a small hill closer to the San Diego River and near the Kumeyaay village of Cosoy. Father Junípero Serra arrived in July of the same year to find the Presidio serving mostly as a hospital. The Spanish built a primitive mission and presidio structure on the hill near the river.

Bad feelings soon developed between the native Kumeyaay and the soldiers, resulting in construction of a stockade which, by 1772, included barracks for the soldiers, a storehouse for supplies, a house for the missionaries and the chapel, which had been improved. The log and brush huts were gradually replaced with buildings made of adobe bricks. Flat earthen roofs were eventually replaced by pitched roofs with rounded roof tiles. Clay floors were eventually lined with fired brick.

In August, 1774 the Spanish missionaries moved the Mission San Diego de Alcalá to its present location six miles up the San Diego River valley (modern Mission Valley) near the Kumeyaay village of Nipaguay. Begun as a thatched chapel and compound built of willow poles, logs and tules, the new Mission was sacked and burned in the Kumeyaay uprising of November 5, 1775. The first adobe chapel was completed in October 1776 and the present church was begun the following year. A succession of building programs through 1813 resulted in the final rectilinear plan that included the church, bell tower, sacristy, courtyard, residential complex, workshops, corrals, gardens and cemetery. Orchards, reservoirs and other agricultural installations were built to the south on the lower San Diego River alluvial terrace and were irrigated by a dam and aqueduct system. The initial Spanish occupation and mission system brought about profound changes in the lives of the Kumeyaay people. Substantial numbers of the coastal Kumeyaay were forcibly brought into the mission or died from introduced diseases.

As early as 1791, presidio commandants in California were given the authority to grant small house lots and garden plots to soldiers and their families and some time after 1800, soldiers and their families began to move down the hill near the San Diego River. Historian William Smythe noted that Don Blas Aguilar, who was born in 1811, remembered at least 15 such grants below Presidio Hill by 1821, of which only five of these grant lands within the boundaries of what would become Old Town had houses in 1821. These included the retired commandant Francisco Ruiz adobe (now known as the Carrillo Adobe), another building later owned by

Henry Fitch on Calhoun Street, the Ybanes and Serrano houses on Juan Street near Washington Street, and a small adobe house on the main plaza owned by Juan Jose Maria Marron.

In 1822 the political situation changed as Mexico won its independence from Spain and San Diego became part of the Mexican Republic. The Mexican Government opened California to foreign trade; began issuing private land grants in the early 1820s, creating the rancho system of large agricultural estates; secularized the Spanish missions in 1833; and oversaw the rise of the civilian pueblo. By 1827, as many as 30 homes existed around the central plaza and in 1835, Mexico granted San Diego official pueblo (town) status. At this time the town had a population of nearly 500 residents, later reaching a peak of roughly 600. By 1835 the presidio, once the center of life in Spanish San Diego, had been abandoned and lay in ruins. Mission San Diego de Alcalá fared little better. The town and the ship landing area at La Playa were now the centers of activity in Mexican San Diego. However, the new Pueblo of San Diego did not prosper as did some other California towns during the Mexican Period.

The secularization in San Diego County triggered increased Native American hostilities against the Californios during the late 1830s. The attacks on outlying ranchos, along with unstable political and economic factors helped San Diego's population decline to around 150 permanent residents by 1840. San Diego's official Pueblo status was removed by 1838 and it was made a subprefecture of the Los Angeles Pueblo. When the Americans took over after 1846, the situation had stabilized somewhat, and the population had increased to roughly 350 non-Native American residents. The Native American population continued to decline, as Mexican occupation brought about continued displacement and acculturation of Native American populations.

The American Period began in 1846 when United States military forces occupied San Diego and this period continues today. When United States military forces occupied San Diego in July 1846, the town's residents split on their course of action. Many of the town's leaders sided with the Americans, while other prominent families opposed the United States invasion. In December 1846, a group of Californios under Andres Pico engaged United States Army forces under General Stephen Kearney at the Battle of San Pasqual and inflicted many casualties. However, the Californio resistance was defeated in two small battles near Los Angeles and effectively ended by January 1847. The Americans assumed formal control with the Treaty of Guadalupe-Hidalgo in 1848 and introduced Anglo culture and society, American political institutions and especially American entrepreneurial commerce. In 1850, the Americanization of San Diego began to develop rapidly.

On February 18, 1850, the California State Legislature formally organized San Diego County. The first elections were held at San Diego and La Playa on April 1, 1850 for county officers. San Diego grew slowly during the next decade. San Diegans attempted to develop the town's interests through a transcontinental railroad plan and the development of a new town closer to the bay. The failure of these plans, added to a severe drought which crippled ranching and the onset of the Civil War, left San Diego as a remote frontier town. The troubles led to an actual drop in the town's population from 650 in 1850 to 539 in 1860. Not until land speculator and developer Alonzo Horton arrived in 1867 did San Diego begin to develop fully into an active American town.

Alonzo Horton's development of a New San Diego (modern downtown) in 1867 began to swing the community focus away from Old Town and began the urbanization of San Diego. Expansion of trade brought an increase in the availability of building materials. Wood buildings gradually replaced adobe structures. Some of the earliest buildings to be erected in the American Period were "Pre-fab" houses which were built on the east coast of the United States and shipped in sections around Cape Horn and reassembled in San Diego. Development spread from downtown based on a variety of factors, including the availability of potable water and transportation corridors. Factors such as views and access to public facilities affected land values, which in turn affected the character of neighborhoods that developed. During the Victorian Era of the late 1800s and early 1900s, the areas of Golden Hill, Uptown, Banker's Hill and Sherman Heights were developed. Examples of the Victorian Era architectural styles remain in these communities, as well as in Little Italy which developed at the same time. At the time downtown was being built, there began to be summer cottage/retreat development in what are now the Beach communities and La Jolla area. The early structures in these areas were not of substantial construction; they were primarily for temporary vacation housing.

Development also spread to the Greater North Park and Mission Hills areas during the early 1900s. The neighborhoods were built as small lots, a single lot at a time; there was not large tract housing development of those neighborhoods. It provided affordable housing away from the downtown area, and development expanded as transportation improved. Barrio Logan began as a residential area, but because of proximity to rail freight and shipping freight docks, the area became more mixed with conversion to industrial uses. This area was more suitable to industrial uses because land values were not as high; topographically the area is more level, and it is not as interesting in terms of views as are the areas north of downtown. Various ethnic groups settled in the area because of the availability of land ownership.

San Ysidro began to be developed at about the turn of the 20th century. The early settlers were followers of the Littlelanders movement. There, the pattern of development was designed to accommodate small plots of land for each homeowner to farm as part of a farming-residential cooperative community. Nearby Otay Mesa-Nestor began to be developed by farmers of Germanic and Swiss background. Some of the prime citrus groves in California were in the Otay Mesa-Nestor area; in addition, there were grape growers of Italian heritage who settled in the Otay River Valley and tributary canyons and produced wine for commercial purposes.

San Diego State University was established in the 1920s; development of the state college area began then and the development of the Navajo community was outgrowth from the college area and from the west. There was farming and ranching in Mission Valley until the middle portion of the 20th century when the uses were converted to commercial and residential. There were dairy farms and chicken ranches adjacent to the San Diego River where now there are motels, restaurants, office complexes and regional shopping malls. There was little development north of the San Diego River until Linda Vista was developed as military housing in the 1940s. The federal government improved public facilities and extended water and sewer pipelines to the area. From Linda Vista, development spread north of Mission Valley to the Clairemont Mesa and Kearny Mesa areas. Development in these communities was mixed use and residential on moderate size lots.

Tierrasanta, previously owned by the United States Navy was developed in the 1970s. It was one of the first planned unit developments with segregation of uses. Tierrasanta and many of the communities that have developed since, such as Rancho Penasquitos and Rancho Bernardo, represent the typical development pattern in San Diego in the last 25 to 30 years: uses are well segregated with commercial uses located along the main thoroughfares, and the residential uses are located in between. Industrial uses are located in planned industrial parks.

Examples of every major period and style remain. Among the recognized styles in San Diego are Spanish Colonial, Pre-Railroad New England, National Vernacular, Victorian Italianate, Stick, Queen Anne, Colonial Revival, Neoclassical, Shingle, Folk Victorian, Mission, Craftsman, Prairie, French Eclectic, Italian Renaissance, Spanish Eclectic, Egyptian Revival, Tudor Revival, Modernistic and International.

Regulatory Framework

The National Historic Preservation Act (NHPA), enacted in 1966, established the National Register of Historic Places, authorized funding for state programs with participation by local governments, created the Advisory Council on Historic Preservation, and established a review process for protecting cultural resources. NHPA provides the legal framework for most state and local preservation laws. The National Register of Historic Places is the nation's official list of cultural resources worthy of preservation. It is part of a national program to coordinate and support public and private efforts to identify, evaluate, and protect historic and archeological resources.

The California Register of Historical Resources was established in 1992, through amendments to the Public Resources Code, as an authoritative guide to be used by state and local agencies, private groups, and citizens to identify the state's historical resources and to indicate what properties are to be protected from substantial adverse change. The California Register includes resources that are formally determined eligible for, or listed in, the National Register, State Historical Landmarks numbered 770 or higher, Points of Historical Interest recommended for listing by the State Historical Resources Commission (SHRC), resources nominated for listing and determined eligible in accordance with criteria and procedures adopted by the SHRC, and resources and districts designated as city or county landmarks when the designation criteria are consistent with California Register criteria.

With establishment of the California Register and the SHRC, the State Legislature amended the California Environmental Quality Act (CEQA) in 1992 to define historical resources as a resource listed in, or determined eligible for listing in, the California Register, a resource included in a local register of historical resources or identified as significant in a historical resource survey that meets certain requirements, and any object, building, structure, site, area, place, record, or manuscript which a lead agency determines to be significant. Generally, a resource is considered to be historically significant if it meets the criteria for listing on the California Register. However, a lead agency under CEQA is not precluded from determining a resource is significant that is not listed in or determined eligible for listing in the California Register, not included in a local register, or identified in a historical resources survey as a historical resource, as defined in the Public Resources Code.

CEQA was further amended to clarify that a project that may cause a substantial adverse change in the significance of a historical resource is a project that may have a significant effect on the environment. While demolition and destruction are fairly obvious significant impacts, it is more difficult to assess when change, alteration, or relocation crosses the threshold of substantial adverse change. The State CEQA Guidelines provide that a project that demolishes or alters those physical characteristics of a historical resource that convey its historical significance, (i.e., its character-defining features), can be considered to materially impair the resource's significance. However, a project that conforms to the *Secretary of the Interior's Standards for the Treatment of Historic Properties* can generally be considered to be a project that will not cause a significant impact.

Several state laws address the importance of Native American involvement in the development review process and provide requirements for treatment of human remains and grave goods and protection of cultural places. Among these laws is the California Native American Graves Protection and Repatriation Act of 2001, consistent with the federal Native American Graves Protection and Repatriation Act, which was enacted to ensure that all California Indian human remains and cultural items be treated with dignity and respect. In addition, sections of the California Health and Safety Code address the discovery of human remains outside a dedicated cemetery and provide the requirements for consultation with appropriate Native American individuals for disposition of the remains. The requirements for local agencies to consult with identified California Native American Tribes, as part of the general plan adoption or amendment process and prior to the dedication of open space, are provided in Government Code Sections 65352.3, 65352.4, 65562.5, and others collectively referred to Senate Bill (SB) 18, which was enacted in September 2004.

Chapters 11, 12 and 14 of the City of San Diego Municipal Code establish the Historical Resources Board (HRB) 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 and traditional cultural properties be preserved unless deviation 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.

Historical Resources Guidelines, located in the 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 from the need for a survey and how impacts are assessed to available mitigation strategies and report requirements and include appropriate methodologies for treating historical resources located in the City.

Any improvement, building, structure, sign, interior element and fixture, feature, site, place, district, area, or object may be designated a historical resource by the City's HRB if it meets one or more of the following designation criteria:

- a. exemplifies or reflects special elements of the City's, a community's, or a neighborhood's, historical, archaeological, cultural, social, economic, political, aesthetic, engineering, landscaping or architectural development;
- b. is identified with persons or events significant in local, state or national history;
- c. embodies distinctive characteristics of a style, type, period, or method of construction or is a valuable example of the use of indigenous materials or craftsmanship;
- d. is representative of the notable work of a master builder, designer, architect, engineer, landscape architect, interior designer, artist, or craftsman;
- e. is listed or has been determined eligible by the National Park Service for listing on the National Register of Historic Places or is listed or has been determined eligible by the State Historical Preservation Office for listing on the State Register of Historical Resources; or
- f. is a finite group of resources related to one another in a clearly distinguishable way or is a geographically definable area or neighborhood containing improvements which have a special character, historical interest or aesthetic value or which represent one or more architectural periods or styles in the history and development of the City.

The first site designated (in 1967) as a historical resource by the City of San Diego is Balboa Park's El Prado. As of 2006, more than 750 buildings, structures, objects, districts, cultural landscapes, and archaeological sites have been designated by the City's HRB.

3.6.2 Thresholds of Significance

A significant impact could occur if implementation of the General Plan:

- Results in adverse physical, indirect or aesthetic effects to prehistoric, historic, or architecturally significant buildings, structures, objects, or sites; or
- Results in impacts to existing religious or sacred uses within the City or the disturbance of any human remains, including those interred outside formal cemeteries.

3.6.3 Impact Analysis

The analysis below analyzes both Thresholds in the same discussion.

Could implementation of the Draft General Plan result in adverse physical or aesthetic effects to prehistoric, historic, or architecturally significant buildings, structures, objects, or sites?

Could implementation of the Draft General Plan result in impacts to existing religious or sacred uses within the City or the disturbance of any human remains, including those interred outside formal cemeteries?

The demolition or substantial alteration of a resource listed on, or formally determined eligible for, the National Register of Historic Places or the California Register of Historical Resources, including contributors to National Register or California Register Historic Districts; or listed on the San Diego Historical Resources Register, including contributors to San Diego Register Historic Districts; or that meet the CEQA criteria for historical resources would represent a significant direct impact to historical resources. Additionally, grading, excavation and other ground disturbing activities associated with development projects that affect significant archaeological sites or traditional cultural properties would represent a significant direct impact to historical resources. While the Draft General Plan does not specifically propose demolition or substantial alteration of a resource or ground disturbing activities such as grading or excavation, it can be assumed that future projects-developed-development consistent with the goals and policies of the General Plan have the potential to result in significant direct and/or indirect impacts to historical resources.

Impacts to ~~the~~ resources associated with the built environment may include substantial alteration, relocation, or demolition of historic buildings, structures, objects, landscapes, and sites. If important archaeological sites occur on property that is proposed for development, construction activities, such as grading and excavation, could result in significant impacts. Archaeological resources may be difficult to detect prior to construction activities, as they are generally located below the ground surface. Most archaeological sites have some surface expression and many have been found within inches of the ground surface. Therefore, the potential to affect important archaeological sites exists if a development activity requires even minimal grading and/or excavation. The likelihood of encountering archaeological resources is greatest on sites that have been minimally excavated in the past (e.g., undeveloped parcels, vacant lots and lots containing surface parking; undeveloped areas around historic buildings; under buildings with post, pier, slab, or shallow wall foundations without basements; etc.). Previously excavated areas are generally considered to have a low potential for archaeological resources, since the soil containing the archaeological resources has been removed. However, under certain circumstances, further evaluation would be required when previously excavated and/or graded project sites are located within areas of known archaeological sensitivity (e.g., recorded sites, designated sites, etc.), or are identified as traditional cultural properties. In addition, building demolition and surface clearance could result in impacts to archaeological resources.

There are many areas within the City of San Diego where prehistoric human remains have been uncovered during both archaeological investigations and grading activities. Therefore, the potential for encountering human remains during construction development activities is possible and impacts to human remains as a result of the Draft General Plan may occur.

~~Although future development in accordance with the General Plan could have a significant impact on historical resources, adoption of the Plan would not, in and of itself, have a significant impact. In fact, the emphasis placed by the General Plan on conserving historical resources and integrating the protection of historical resources into the broader planning process would reduce impacts to historical resources that may have otherwise occurred with future projects.~~

The General Plan includes the following policies related to historical resources:

1. Strengthen historic preservation planning.
2. Fully integrate the consideration of historical and cultural resources in the larger land use planning process.
3. Foster government-to-government relationships with the Kumeyaay/Diegueño tribes of San Diego.
4. Actively pursue a program to identify, document and evaluate the historical and cultural resources in the City of San Diego.
5. Designate and preserve significant historical and cultural resources for current and future generations.
6. Promote the maintenance, restoration and rehabilitation of historical resources through a variety of financial and development incentives. Continue to use existing programs and develop new approaches as needed. Encourage continued private ownership and utilization of historic structures through a variety of incentives.
7. Develop a historic preservation sponsorship program.
8. Foster greater public participation and education in historical and cultural resources.
9. Increase opportunities for cultural heritage tourism.

In addition to the General Plan's policies for historic preservation, historical resource protections are provided by the Land Development Code and CEQA, which require an extensive regulatory process to avoid adverse impacts to designated historical resources to the extent feasible. These provisions have at times resulted in development that incorporates historic elements or entire structures into new projects and sets aside significant archaeological sites in protected open space. Therefore, the enforcement of local, state and federal regulations aids in ensuring the protection and preservation of significant historical resources.

Implementation of the above policies and compliance with the historical resources regulations and guidelines would serve to reduce impacts to a degree, but cannot guarantee that all future project level impacts will be avoided or mitigated to a level less than significant. It should be noted, that recorded archaeological sites which have not been evaluated are considered significant and will require further evaluation prior to project approval. Because the degree of impact and applicability, feasibility, and success of these measures cannot be accurately predicted for each specific project at this time, the program level impact related to historical resources is considered significant and unavoidable.

3.6.4 Mitigation Framework

Goals, policies, and recommendations enacted by the City combined with the federal, state and local regulations described above provide a framework for developing project level historical resources mitigation measures for future discretionary projects. All future project submittals will be subject to site specific review in accordance with the Historical Resources Regulation and Guidelines. The City's process for the evaluation of discretionary projects includes environmental review and documentation pursuant to CEQA as well as an analysis of those projects for consistency with the goals, policies and recommendations of the General Plan. Historical resource evaluations are required when new resources are identified as a result of a survey, when previously recorded resources that have not been previously evaluated are

relocated during a survey, and when previously recorded sites are not relocated during the survey and if there is a likelihood that the resource still exists. Evaluations will not be required if the resource has been evaluated for CEQA significance or for National Register eligibility within the last five years if there has been no change in the conditions which contributed to the determination of significance or eligibility. A property should be re-evaluated if its condition or setting has either improved or deteriorated, if new information is available, or if the resource is becoming increasingly rare due to the loss of other similar resources. Once it has been determined that a historical resource is present and could be impacted as a result of project implementation, recommendations for mitigation consistent with the Historical Resources Guidelines must be adopted.

Included here are ~~more detailed~~ measures that are currently applied to projects that could result in impacts to historical resources. It should be noted that at the time of this writing, these measures are generally considered to be adequate mitigation. However, in the future, mitigation measures may be periodically updated. Future projects would be subject to site-specific measures in effect at the time the projects are processed.

Prior to issuance of any permit that would directly or indirectly affect a building/structure in excess of 45 years of age, the City shall determine whether the affected building/structure meets any of the following criteria: (1) National Register-Listed or formally determined eligible, (2) California Register-Listed or formally determined eligible, (3) San Diego Register-Listed or formally determined eligible, or (4) meets the CEQA criteria for a historical resource. ~~If the building/structure has been previously determined not to meet any of these four criteria, no additional action will be required. If the building/structure does meet this criteria and substantial alteration or demolition is proposed the following measures are typically required as a condition of the permit:~~ The evaluation of historic architectural resources would be based on criteria such as: age, location, context, association with an important person or event, uniqueness or structural integrity as indicated in the Historical Resources Guidelines.

Preferred mitigation for historic buildings or structures is to avoid the resource through project redesign. If the resource cannot be entirely avoided, all prudent and feasible measures to minimize harm to the resource shall be taken. Depending upon project impacts, measures can include, but is not limited to:

- a. Preparing a historic resource management plan;
- b. Designing new construction which is compatible in size, scale, materials, color and workmanship to the historic resource (such additions, whether portions of existing buildings or additions to historic districts, shall be clearly distinguishable from historic fabric);
- c. Repairing damage according to the Secretary of the Interior's Standards for Rehabilitation;
- d. Screening incompatible new construction from view through the use of berms, walls and landscaping in keeping with the historic period and character of the resource;
- e. Shielding historic properties from noise generators through the use of sound walls, double glazing and air conditioning; and
- f. Removing industrial pollution at the source of production.

For resources that have been determined eligible or have been designated under federal, state or

local criteria, and the potential exists for direct and/or indirect impacts associated with building alteration, demolition, restoration or relocation, the following measures shall be implemented:

Historical architectural building alteration, construction, restoration, or relocation

Prior to preconstruction (Precon) meeting

1. Plan Check.

Notes on plan:

- a. Prior to the issuance of any permit, including but is not limited to, demolition or any discretionary action, the City's Environmental Review Managers (ERM) shall verify that the requirement for historical monitoring during alteration, construction and/or restoration has been noted on the Grading/Demolition Plans.
- b. The applicant shall implement the DP and TPs as indicated in 4. and 5. below.
- c. The DP Program can be implemented prior to Precon Meeting. However, monitoring can not begin until a Precon Meeting has been held at least one week prior to issuance of appropriate permits.
- d. Physical description including year, type of structure and extent of work shall be noted on the plans.

2. Letters of Qualification have been submitted to ERM.

- a. Prior to the issuance of any permits, including but not limited to, a grading permit or other discretionary action, the applicant shall provide a letter of verification to the ERM stating that a qualified Historian and/or Architectural Historian, as defined in the City of San Diego Historical Resources Guidelines, has been retained to implement the DP and TPs. If applicable, DP following the *Secretary of the Interior's Standards and Guidelines for Architectural and Engineering DP: HABS/HAER Standards, 1990* may be required.

3. Second letter containing names of monitors has been sent to MMC.

- a. At least thirty days prior to the Precon Meeting, a second letter shall be submitted to Mitigation Monitoring Coordination (MMC) of LDR and shall include the names of all persons involved in the historical monitoring of this project and shall be approved by ERM prior to the first Precon Meeting. MMC will provide Plan Check with a copy of both the first and second letter.

4. Documentation P Program (DP)

Prior to the issuance of a Demolition or Grading Permit, the DP shall be submitted to the Environmental Analysis Section (EAS) for approval by the ERM and shall include the following:

1. Photo DP

- (a) DP shall include professional quality photo DP of the structure prior to demolition with 35mm black and white photographs (4x6 standard

~~format), taken of all four elevations and close-ups of select architectural elements, such as, but not limited to, roof/wall junctions, window treatments, decorative hardware. Photographs shall be of archival quality and easily reproducible.~~

- ~~(b) Xerox copies of the photographs shall be submitted for archival storage with the City of San Diego Historical Resources Board, the Land Development Review Division and the South Coastal Information Center. One set of original photographs and negatives shall be submitted for archival storage with the California Room of the City of San Diego Public Library, the San Diego Historical Society and other historical society or groups.~~

~~2. Required drawings~~

- ~~(a) Measured drawings of the building's exterior elevations depicting existing conditions or other relevant features shall be produced from recorded, accurate measurements. If portions of the building are not accessible for measurement, or cannot be reproduced from historic sources, they should not be drawn, but clearly labeled as not accessible. Drawings produced in ink on translucent material or archivally stable material (blue-line drawings are acceptable). Standard drawing sizes are 19" x 24" or 24" x 36"; standard scale is 1/4" = 1 foot.~~

- ~~(b) One set of measured drawings shall be submitted for archival storage with the City of San Diego Historical Resources Board, the Land Development Review Division, the South Coastal Information Center, the California Room of the City of San Diego Public Library, the San Diego Historical Society and other historical society or groups.~~

- ~~(c) Prior to the first Precon Meeting, a letter of verification shall be obtained from EAS and copied to MMC verifying that the DP has been approved.~~

~~5. Treatment Plan~~

~~The approved TP would be inserted here once a Mitigation Agreement Letter has been signed. The following measure should be included at the end of this section:~~

~~Prior to the start of any work, the Historian and/or Architectural Historian shall provide verification that Phase I of the TP has been completed.~~

Precon meeting

~~1. Historian and/or Architectural Historian Shall Attend Precon Meetings~~

~~For all projects: At least thirty days prior to implementation of the MMRP, the applicant shall arrange a Precon Meeting that shall include the Historian and/or~~

~~Architectural Historian, Construction Manager or Grading Contractor, Resident Engineer (RE), Building Inspector (BI) and MMC. In addition, the Historian and/or Architectural Historian shall attend any focused precon meetings at the request of MMC to make comments and/or suggestions concerning the historical monitoring program with the construction manager and/or grading contractor.~~

~~2. Submit Letter of Verification of approval of DP~~

~~A letter of verification that the DP has been approved by the ERM. ADD Environmental Designee shall be submitted to the RE or BI, as appropriate, at the first Precon Meeting and copy provided to MMC.~~

~~3. Identify Areas to be Monitored~~

~~At the Precon Meeting the Historian and/or Architectural Historian shall submit to MMC a copy of the site/grading plan (reduced to 11x17) that identifies the areas involved in the DP and TP as noted above.~~

~~4. DP and TP Construction Schedule~~

~~Prior to the start of any work, The Historian and/or Architectural Historian shall submit a construction schedule for implementation of the DP and TPs and will notify MMC of the start date.~~

During construction

~~1. Monitor Shall be Present During Implementation of TP.~~

~~The Historian and/or Architectural Historian shall be present during implementation of the TP. The qualified historian shall document activity via the Consultant Site Visit Record. This record shall be sent to the RE or BI, every month. RE or BI will forward copies to MMC.~~

~~2. Night Work~~

~~a. If night work is included in the contract:~~

~~(1) — The extent and timing shall be presented and discussed at the precon meeting.~~

~~(2) — All work shall be recorded on the Site Visit Record and the RE, or BI, as appropriate, will notify MMC of any unusual circumstances by 9AM the following morning.~~

~~(3) — MMC will coordinate with LDR staff, as appropriate.~~

~~b. If night work becomes necessary during the course of the project:~~

~~(1) — The qualified Historian and/or Architectural Historian shall notify the RE, or BI, as appropriate a minimum of 24 hours before work is to begin.~~

~~(2) — The RE, or BI, as appropriate will notify MMC immediately.~~

~~c. All other procedures described above will apply, as appropriate.~~

Post construction**1. Final Results Report (Historic DP):**

After completion of the MMRP, the Final Results Report (FRP), including historic DP shall be submitted to MMC for review by the ERM. ~~ADD Environmental Designee.~~

2. Verification of Historic DP Distribution:

Prior to release of the grading bond and/or issuance of any Building Permits or Certificate of Occupancy, the Historical Consultant shall provide verification to the ERM ~~MMC~~ that copies of the historic DP have been distributed, as indicated in four Section 4.b. above.

Historical architectural demolition**Prior to preconstruction (precon) meeting****1. Land Development Review (LDR) Plan Check:**Notes on plan

- a. Prior to the issuance of any permits, including but not limited to, the first Grading/Demolition Permit, the ERM. ~~ADD Environmental Designee~~ shall verify that the requirement for historical monitoring during demolition has been noted on the appropriate construction documents.
- b. ~~Demolition work can not begin until a Precon Meeting has been held at least one week prior to issuance of appropriate permits.~~
- b. Physical description, including the year and type of structure, and extent of demolition shall be noted on the plans.

2. Letters of Qualification have been submitted to ERM. ~~ADD~~

- c. Prior to the issuance of any permits, including but not limited to, a grading permit or other discretionary action, the applicant shall provide a letter of verification to the ERM. ~~ADD Environmental Designee~~ stating that a qualified Historian and/or Architectural Historian, as defined in the City of San Diego Historical Resources Guidelines (HRG), has been retained to implement the demolition monitoring program for the existing structure as noted on the plans.

3. Second letter containing names of monitors has been sent to MMC:

- a. At least thirty days prior to the Precon Meeting, a second letter shall be submitted to Mitigation Monitoring Coordination (MMC) of LDR and shall include the name of the Principal Investigator (PI) and all persons involved in the historical monitoring of this project and shall be approved by ERM prior to the first Precon Meeting.
- b. MMC will provide Plan Check with a copy of both the first and second letter.

Documentation Program (DP). —

Prior to the first Precon Meeting and/or issuance of a Demolition or Grading Permit, the DP shall be submitted to the Environmental Analysis Section (EAS) for approval by the ERM and shall include the following:

1. ~~Photo Documentation.~~

- (a) ~~Documentation shall include professional quality photo documentation of the structure prior to demolition with 35mm~~

~~black and white photographs, 4x6 standard format, taken of all four elevations and close-ups of select architectural elements, such as, but not limited to, roof/wall junctions, window treatments, decorative hardware. Photographs shall be of archival quality and easily reproducible.~~

~~(b) Xerox copies of the photographs shall be submitted for archival storage with the City of San Diego Historical Resources Board, the Land Development Review Division and the South Coastal Information Center. One set of original photographs and negatives shall be submitted for archival storage with the California Room of the City of San Diego Public Library, the San Diego Historical Society and other historical society or groups.~~

~~2. Required drawings.~~

~~(a) Measured drawings of the building's exterior elevations depicting existing conditions or other relevant features shall be produced from recorded, accurate measurements. If portions of the building are not accessible for measurement, or cannot be reproduced from historic sources, they should not be drawn, but clearly labeled as not accessible. Drawings produced in ink on translucent material or archivally stable material (blue-line drawings are acceptable). Standard drawing sizes are 19" x 24" or 24" x 36", standard scale is 1/4" = 1 foot.~~

~~(b) One set of measured drawings shall be submitted for archival storage with the City of San Diego Historical Resources Board, the Land Development Review Division and the South Coastal Information Center, the California Room of the City of San Diego Public Library, the San Diego Historical Society and other historical society or groups.~~

~~(c) Prior to the first Precon Meeting, a letter shall be obtained from EAS and copied to MMC verifying that the CP has been approved.~~

Precon Meeting

~~Monitor Shall Attend Precon Meetings.~~

~~At least thirty days prior to the start of demolition, the Applicant shall arrange a Precon Meeting which includes the Historian and/or Architectural Historian, Construction Manager, Grading Contractor, Resident Engineer (RE), Building Inspector (BI), as appropriate, and MMC. In addition, the Historian and/or Architectural Historian shall attend any focused grading-related Precon Meetings at the request of MMC to make comments and/or suggestions concerning the historical monitoring program with the Construction Manager and/or Grading Contractor.~~

~~2. Identify Areas to be Monitored.~~

~~At the Precon Meeting the Historian and/or Architectural Historian shall submit to MMC a copy of the site/grading plan (reduced to 11x17) that identifies areas to be monitored as noted in A 1.e.~~

~~3. When Demolition Monitoring Will Occur.~~

~~The Historian and/or Architectural Historian shall submit a construction schedule to MMC through the RE or BI, as appropriate, indicating when and where monitoring is to begin and shall notify MMC of the start date for monitoring.~~

During construction

- ~~1. Monitor Shall be Present During Grading/Excavation and/or Demolition. The Historian and/or Architectural Historian shall be present during all grading/excavation and/or demolition activities as indicated in B.2., above. The Historian and/or Architectural Historian shall document activity via the Consultant Site Visit Record.~~
- ~~2. Night Work.

 - ~~a. If night work is included in the contract,

 - ~~(1) The extent and timing shall be presented and discussed at the pre-con meeting.~~
 - ~~(2) All work shall be recorded on the Site Visit Record and the RE, or BI, as appropriate, will notify MMC of any unusual circumstances by 9AM the following morning.~~
 - ~~(3) MMC will coordinate with LDR staff, as appropriate.~~~~
 - ~~b. If night work becomes necessary during the course of the project

 - ~~(1) The PI shall notify the RE, or BI, as appropriate a minimum of 24 hours before work is to begin.~~
 - ~~(2) The RE, or BI, as appropriate will notify MMC immediately.~~~~
 - ~~c. All other procedures described above will apply, as appropriate.~~~~

Post construction

Final Results Report

- ~~a. Within three months of completion of the demolition monitoring, as noted on the plans, two copies of the Final Results Report shall be submitted to MMC for approval by the ERM.~~
- ~~b. MMC will notify the RE or BI, as appropriate, of receipt of the Final Results Report.~~

I. Prior to Permit Issuance

A. Construction Plan Check

- ~~1. Prior to Notice to Proceed (NTP) for ANY construction permits, including but not limited to, any demolition permit, the first Grading Permit and Building Permits, but prior to the first preconstruction meeting, whichever is applicable, the Assistant Deputy Director (ADD) Environmental Designee shall verify that the requirements for historical monitoring during stabilization have been noted on the appropriate construction documents.
 - ~~a. Stabilization work can not begin until a Precon Meeting has been held at least one week prior to issuance of appropriate permits.~~
 - ~~b. Physical description, including the year and type of structure, and extent of stabilization shall be noted on the plans.~~~~

B. Submittal of Treatment Plan for Retained Historic Resources

- ~~1. Prior to Notice to Proceed (NTP) for any construction permits, including but not limited to, the first Grading Permit and Building Permits, but prior to the first preconstruction meeting, whichever is applicable, the Applicant shall submit a Treatment Plan to the ADD Environmental Designee for review and approval that includes measures for protecting any historic buildings and/or building components during construction related activities (e.g. removal of~~

non-historic features, demolition of adjacent structures, subsurface structural support, etc.). The Treatment Plan shall be shown as notes on all construction documents (i.e. Grading and/or Building Plans).

C. Letters of Qualification have been submitted to the ADD

1. The applicant shall submit a letter of verification to the City Mitigation Monitoring Coordination Section (MMC) identifying the Principal Investigator (PI) for the project and the names of all persons involved in the historical monitoring program (i.e., Architectural Historian, Historic Architect and/or Historian), as defined in the City of San Diego Historical Resources Guidelines (HRG).
2. MMC will provide a letter to the applicant confirming the qualifications of the PI and all persons involved in the historical monitoring of the project.
3. Prior to the start of work, the applicant must obtain approval from the ADD for any personnel changes associated with the monitoring program.

D. In addition to the following Historical Mitigation Program, the Applicant shall comply with any other conditions for designated historical resources, when applicable that are contained in the Site Development Permit identified under the heading Historical Resources Requirements.

II. Prior to Start of Construction

A. Documentation Program (DP)

1. Prior to the first Precon Meeting and/or issuance of any construction permit, the DP shall be submitted to MMC for review and approval and shall include the following:
 - a. Photo Documentation
 - (1) Documentation shall include professional quality photo documentation of the structure prior to any construction related activities with 35mm black and white photographs, 4x6 standard format, taken of all four elevations and close-ups of select architectural elements, such as, but not limited to, roof/wall junctions, window treatments, decorative hardware. Photographs shall be of archival quality and easily reproducible.
 - (2) Xerox and/or digital copies (CD/DVD) of the photographs shall be submitted for archival storage with the City of San Diego Historical Resources Board and the City of San Diego Project file and Historical Resources Library. One set of original photographs and negatives shall be submitted for archival storage with the California Room of the City of San Diego Public Library, the San Diego Historical Society and/or other relative historical society or group(s).
 - b. Required drawings
 - (1) Measured drawings of the building's exterior elevations depicting existing conditions or other relevant features shall be produced from recorded, accurate measurements. If portions of the building are not accessible for measurement, or cannot be reproduced from historic sources, they should not be drawn, but clearly labeled as not accessible. Drawings produced in ink on translucent material or archivally stable material (blue-line drawings are acceptable). Standard drawing sizes are 19" x 24" or 24" x 36", standard scale is 1/4" = 1 foot.

(2) One set of measured drawings shall be submitted for archival storage with the City of San Diego Historical Resources Board, the City of San Diego Project file and Historical Resources Library, the South Coastal Information Center, the California Room of the City of San Diego Public Library, the San Diego Historical Society and/or other historical society or group(s).

2. Prior to the first Precon Meeting, MMC shall verify that the DP has been approved.

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 Historian and/or Architectural Historian shall attend any grading/excavation related Precon Meetings to make comments and/or suggestions concerning the Historical 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. Historical Monitoring Plan (HMP)

a. Prior to the start of any work that requires monitoring; the PI shall submit a Historical Monitoring Program which describes how the monitoring would be accomplished for approval by the MMC. The HMP shall include a Historical Monitoring Exhibit (HME) 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 HME shall be based on the results of a site-specific records search as well as information regarding existing known soil conditions (native or formation).

c. 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.

d. 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.

3. Prior to beginning any work that requires monitoring, the Applicant shall submit a preliminary research plan to indicate how the significant historical resources will be handled should they be encountered during the monitoring. The preliminary research plan must be approved by the MMC before work begins.

C. Implementation of Approved Treatment Plan for Historic Resources

1. Implementation of the approved Treatment Plan for the protection of Historic Resources within the project site may not begin prior to the completion of the Documentation Program as defined above.

2. The Historian and/or Architectural Historian shall attend weekly jobsite meetings and be on-site daily during the stabilization phase for any retained or adjacent historic resource to photo document the Treatment Plan process.
3. The Historian and/or Architectural Historian shall document activity via the Consultant Site Visit Record (CSV). The CSV's shall be faxed by the CM to the RE the first day and last day (Notification of Monitoring Completion) of the Treatment Plan process and in the case of ANY unanticipated incidents. The RE shall forward copies to MMC.
4. Prior to the start of any construction related activities, the applicant shall provide verification to MMC that all historic resources on-site have been adequately stabilized in accordance with the approved Treatment Plan. This may include a site visit with MMC, the CM, RE or BI, but may also be accomplished through submittal of the draft Treatment Plan photo documentation report.
5. MMC will provide written verification to the RE or BI after the site visit or upon approval of draft Treatment Plan report indicating that construction related activities can proceed.

D. Verification of approval of a Historical Commemorative Program (HCP), if applicable

1. The applicant shall submit documentation to MMC for concurrent review and approval by HRB for a site-specific HCP, if mitigation for impacts to a designated resource is based on association with an important person, event or community history and the building would not be retained on-site.
2. MMC in consultation with HRB staff shall provide a letter to the applicant approving or denying the proposal prior to the first preconstruction meeting and/or issuance of any construction permit. However, should conditional approval of the proposal be granted, construction may be allowed to proceed, but the Certificate of Occupancy may not be issued until the historical commemorative program is approved.
3. Prior to the issuance of any Certificate of Occupancy, the applicant shall provide verification to MMC that the HCP has been implemented in accordance with the approved program. This may include a site visit with MMC, HRB, the ADD Environmental Designee, the CM, RE or BI, but may also be accomplished through submittal of photo documentation or appropriate reporting program.
4. MMC will provide written verification to the RE or BI after the site visit indicating that the Certificate of Occupancy can issued.

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 which could result in impacts to historical resources as identified on the HME. The Construction Manager is responsible for notifying the RE, PI, and MMC of changes to any construction activities.
2. The monitor shall document field activity via the Consultant Site Visit Record (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 incidents involving the historical resource. The RE shall forward copies to MMC.

3. The PI may submit a detailed letter to MMC during construction requesting a modification to the monitoring program when a field condition arises which could effect the historical resource being retained on-site or adjacent to the construction site.

B. Notification Process

1. In the event of damage to a historical resource retained on-site or adjacent to the project site, the Historical Monitor shall direct the contractor to temporarily divert construction activities in the area of historical resource and immediately notify the RE or BI, as appropriate, and the PI (unless Monitor is the PI) .
2. The PI shall immediately notify MMC by phone of the incident, 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/Evaluation of Impacts to a Historical Resource

1. The PI shall evaluate the incident relative to the historical resource.
 - a. The PI shall immediately notify MMC by phone to discuss the incident and shall also submit a letter to MMC indicating whether additional mitigation is required.
 - b. If impacts to the historical resource are significant, the PI shall submit a proposal for mitigation and obtain written approval from MMC in consultation with HRB and the ADD Environmental Designee. Direct and/or indirect impacts to historical resources from construction activities must be mitigated before work will be allowed to resume.
 - c. If impacts to the historical resource are not considered significant, the PI shall submit a letter to MMC indicating that the incident will be documented in the Final Monitoring Report. The letter shall also indicate that 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 Impacts/Incidents
In the event that no historical resources were impacted during night work, the PI shall record the information on the CSVR and submit to MMC via fax by 9am of the next business day.
 - b. Potentially Significant Impacts
If the PI determines that a potentially significant impact has occurred to a historical resource, the procedures detailed under Section III - During Construction shall be followed.
 - c. The PI shall immediately contact MMC, or by 8AM the following morning 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.

V. Post Construction

A. Submittal of Draft Monitoring Report

1. The PI shall submit two copies of the Draft Monitoring Report (even if negative) which describes the results, analysis, and conclusions of all phases of the Historical Monitoring Program (with appropriate graphics) to MMC for review and approval within 90 days following the completion of monitoring.
 - a. The preconstruction Treatment Plan and Documentation Plan (photos and measured drawings) and Historical Commemorative Program, if applicable, shall be included and/or incorporated into the Draft Monitoring Report.
 - b. The PI shall be responsible for updating (on the appropriate State of California Department of Park and Recreation forms-DPR 523 A/B) any existing site forms to document the partial and/or complete demolition of the resource. Updated forms shall be submitted 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. 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 until receiving a copy of the approved Final Monitoring Report from MMC.

Prior to issuance of any permit that could directly affect an archaeological ~~resource~~, resource; the City shall require the following steps be taken to determine: (1) the presence of archaeological resources and (2) the appropriate mitigation for any significant resources which may be impacted by a development activity. Sites may include but are not limited to, residential and commercial properties, privies, trash pits, building foundations, and industrial features representing the contributions of people from diverse socio-economic and ethnic backgrounds. Sites may also include resources associated with pre-historic Native American activities.

Step 1-Initial Evaluation

~~An intensive survey and initial evaluation for the potential of significant subsurface archaeological resources may be required to be prepared to the satisfaction of the City for any activity which involves excavation or building demolition. The initial evaluation generally consists of a pedestrian survey and a records search at the South Coastal Information Center.~~

~~Historical and existing land uses are also reviewed to assess the potential for significant archaeological resources to be present.~~

~~No further action is required if the initial evaluation demonstrates there is no potential for subsurface resources. The results of this research will be summarized in the environmental document.~~

~~Step 2 Testing~~

~~A testing program is required if the evaluation demonstrates that there is a potential for subsurface resources. This shall entail a separate phase of investigations from any mitigation monitoring during construction. The testing program shall be performed by a professional archaeologist meeting the qualifications specified in Appendix B of the San Diego Land Development Code, Historical Resources Guidelines. Before commencing the testing, a treatment plan shall be submitted for City approval that reviews the initial evaluation results and includes a research design. The research design shall include a discussion of field methods, research questions against which discoveries shall be evaluated for significance, collection strategy, laboratory and analytical approaches, and curation arrangements. All tasks shall be in conformity with best practices in the field of historic urban archaeology. A recommended approach for historic urban sites is at a minimum to remove fills and debris along interior lot lines or other areas indicated on Sanborn maps.~~

~~Security measures such as a locked fence or surveillance shall be taken to prevent looting or vandalism of archaeological resources as soon as demolition is complete or paved surfaces are removed. These measures shall be maintained during archaeological field investigations. It is recommended that exposed features be covered with steel plates or fill dirt when not being investigated.~~

~~The results of the testing phase shall be submitted in writing to the City and shall include the research design, testing results, significance evaluation, and recommendations for further treatment. Final determination of significance shall be made in consultation with City Staff, and with the Native American community, if the finds are prehistoric. If no significant resources are found and site conditions are such that there is no potential for further discoveries, then no further action is required. If no significant resources are found but results of the initial evaluation and testing phase indicate there is still a potential for resources to be present in portions of the property that could not be tested, then mitigation monitoring is required. If significant resources are discovered during the testing program, then data recovery shall be undertaken prior to construction. City Staff must concur with evaluation results before the next steps can proceed.~~

~~Step 3 Data Recovery~~

~~For any site determined to be significant, a Research Design and Data Recovery Program shall be prepared, approved by City Staff, and carried out to mitigate impacts before any activity which could potentially disturb significant resources. The archaeologist shall notify the City of the date upon which data recovery will commence 10 working days in advance.~~

~~All cultural materials collected shall be cleaned, catalogued and permanently curated with an appropriate institution. All artifacts shall be analyzed to identify function and chronology as they relate to the history of the area. Faunal material shall be identified as to species and specialty studies shall be completed, as appropriate. All newly discovered archaeological sites shall be recorded with the South Coastal Information Center at San Diego State University. Any human bones and associated grave goods of Native American origin shall, upon consultation, be turned over to the appropriate Native American group for reburial, in accordance with state regulations.~~

~~A draft Data Recovery Report shall be submitted to the City within twelve months of the commencement of the data recovery. Data Recovery Reports shall describe the research design or questions, historic context of the finds, field results, analysis of artifacts, and conclusions. Appropriate figures, maps and tables shall accompany the text. The report shall also include a catalogue of all finds and a description of curation arrangements at an approved facility. Finalization of draft reports shall be subject to City Staff review.~~

~~Step 4 – Monitoring~~

~~When important archaeological sites are suspected to be present on a project site but their presence cannot be confirmed prior to construction or demolition due to obstructions or spatially limited testing and data recovery, an archaeological monitoring program will be required. The City of San Diego monitoring requirements are provided below.~~

INITIAL DETERMINATION

The environmental analyst will determine the likelihood for the project site to contain historical resources by reviewing site photographs and existing historic information (e.g. Archaeological Sensitivity Maps, the Archaeological Map Book, and the City of San Diego’s “Historical Inventory of Important Architects, Structures, and People in San Diego”) and conducting a site visit. If there is any evidence that the site contains archaeological resources, then a historic evaluation consistent with the City of San Diego’s Historical Resources Guidelines would be required. All individuals conducting any phase of the archaeological evaluation program must meet professional qualifications in accordance with the City’s Historical Resources Guidelines.

STEP 1:

Based on the results of the Initial Determination, if there is evidence that the site contains historical resources, preparation of a historic evaluation is required. The evaluation report would generally include background research, field survey, archeological testing and analysis. Before actual field reconnaissance would occur, background research is required which includes a record search at the South Coastal Information Center (SCIC) at San Diego State University and the San Diego Museum of Man. A review of the Sacred Lands File maintained by the Native American Heritage Commission (NAHC) must also be conducted at this time. Information about existing archaeological collections should also be obtained from the San Diego Archaeology Center and any tribal repositories or museums.

In addition to the record searches mentioned above, background information may include, but is not limited to: examining primary sources of historical information (e.g., deeds and wills), secondary sources (e.g., local histories and genealogies), Sanborn Fire Maps, and historic cartographic and aerial photograph sources; reviewing previous archeological research in similar areas, models that predict site distribution, and archeological, architectural, and historical site inventory files; and conducting informant interviews. The results of the background information would be included in the evaluation report.

Once the background research is complete a field reconnaissance must be conducted by individuals whose qualifications meet the standards outlined in the City of San Diego's Historical Resources Guidelines. Consultants are encouraged to employ innovative survey techniques when conducting enhanced reconnaissance including but not limited to, remote sensing, ground penetrating radar and other soil resistivity techniques as determined on a case by case basis. Native American participation is required for field surveys when there is likelihood that the project site contains prehistoric archaeological resources or traditional cultural properties. If through background research and field surveys historic resources are identified, then an evaluation of significance must be performed by a qualified archaeologist or historian, as applicable.

STEP 2:

Once a historic resource has been identified, a significance determination must be made. It should be noted, that tribal representatives and/or Native American monitors will be involved in making recommendations regarding the significance of prehistoric archaeological sites during this phase of the process. The testing program may require reevaluation of the proposed project in consultation with the Native American representative which could result in a combination of project redesign to avoid and/or preserve significant resources as well as mitigation in the form of data recovery and monitoring (as recommended by the qualified archaeologist and Native American representative). An archaeological testing program will be required which includes evaluating the horizontal and vertical dimensions of a site, the chronological placement, site function, artifact/ecofact density and variability, presence/absence of subsurface features and research potential. A thorough discussion of testing methodologies including, surface and subsurface investigations can be found in the City of San Diego's Historical Resources Guidelines.

The results from the testing program will be evaluated against the Significance Thresholds found in the Historical Resources Guidelines. If significant historical resources are identified within the Area of Potential Effect, the site may be eligible for local designation. At this time, the final testing report must be submitted to Historical Resources Board staff for eligibility determination and possible designation. An agreement on the appropriate form of mitigation is required prior to distribution of a draft environmental document. If no significant resources are found, and site conditions are such that there is no potential for further discoveries, then no further action is required. Resources found to be non-significant as a result of a survey and/or assessment will require no further work beyond documentation of the resources on the appropriate DPR site forms and inclusion of results in the survey and/or assessment report. If no significant resources

are found but results of the initial evaluation and testing phase indicates there is still a potential for resources to be present in portions of the property that could not be tested, then mitigation monitoring is required.

STEP 3:

Preferred mitigation for historic resources is to avoid the resource through project redesign. If the resource cannot be entirely avoided, all prudent and feasible measures to minimize harm shall be taken. For archaeological resources where preservation is not an option, a Research Design and Data Recovery Program (RDDR) is required which includes a Collections Management Plan for review and approval. The data recovery program shall be based on a written research design and is subject to the provisions as outlined in CEQA, Section 21083.2. The data recovery program must be reviewed and approved by the City's Environmental Analyst prior to draft CEQA document distribution. Archaeological monitoring may be required during building demolition and/or construction grading when significant resources are known or suspected to be present on a site, but cannot be recovered prior to grading due to obstructions such as but not limited to, existing development or dense vegetation.

A Native American observer must be retained for all subsurface investigations, including geotechnical testing and other ground disturbing activities whenever a Native American Traditional Cultural Property or any archaeological site located on City property or within the APE of a City project would be impacted. In the event that human remains are encountered during data recovery and/or monitoring program, the provisions of Public Resources Code Section 5097 must be followed. These provisions are outlined in the Mitigation Monitoring and Reporting Program included in the environmental document. The Native American monitor shall be consulted during the preparation of the written report, at which time they may express concerns about the treatment of sensitive resources. If the Native American community requests participation of an observer for subsurface investigations on private property, the request shall be honored.

STEP 4:

Historic resource reports shall be prepared by qualified professionals as determined by the criteria set forth in Appendix B of the Historical Resources Guidelines. The discipline shall be tailored to the resource under evaluation. In cases involving complex resources, such as traditional cultural properties, rural landscape districts, or sites involving a combination of prehistoric and historic archaeology, or historic districts, a team of experts will be necessary for a complete evaluation.

Specific types of historical resource reports are required to document the methods (see Section III of the Historical Resources Guidelines) used to determine the presence or absence of historical resources; to identify the potential impacts from proposed development and evaluate the significance of any identified historical resources; to document the appropriate curation of archaeological collections (e.g. collected materials and the associated records); in the case of potentially significant impacts to historical resources, to recommend appropriate mitigation

measures that would reduce the impacts to below a level of significance; and to document the results of mitigation and monitoring programs, if required.

Archaeological Resource Management reports shall be prepared in conformance with the California Office of Historic Preservation (OHP) "Archaeological Resource Management Reports (ARMR): Recommended Contents and Format" (see Appendix C of the Historical Resources Guidelines), which will be used by Environmental Analysis Section staff in the review of archaeological resource reports. Consultants must ensure that archaeological resource reports are prepared consistent with this checklist. This requirement will standardize the content and format of all archaeological technical reports submitted to the City. A confidential appendix must be submitted (under separate cover), along with historical resources reports for archaeological sites and traditional cultural properties, containing the confidential resource maps and records search information gathered during the background study. In addition, a Collections Management Plan shall be prepared for projects which result in a substantial collection of artifacts and must address the management and research goals of the project, the types of materials to be collected and curated based on a sampling strategy that is acceptable to the City of San Diego. Appendix D (Historical Resources Report Form) may be used when no archaeological resources were identified within the project boundaries.

STEP 5:

For Archaeological Resources: All cultural materials, including original maps, field notes, non-burial related artifacts, catalog information and final reports recovered during public and/or private development projects must be permanently curated with an appropriate institution, one which has the proper facilities and staffing for insuring research access to the collections consistent with state and federal standards. ¶In the event that a prehistoric and/or historical deposit is encountered during construction monitoring, a Collections Management Plan would be required in accordance with the project Mitigation, Monitoring and Reporting Program (MMRP). The disposition of human remains and burial related artifacts that cannot be avoided or are inadvertently discovered is governed by state (i.e., AB 2641 and California Native American Graves Protection and Repatriation Act (CALNAGPRA) of 2001 and federal (i.e., Federal NAGPRA) law, and must be treated in a dignified and culturally appropriate manner with respect for the deceased individual(s) and their descendants. Any human bones and associated grave goods of Native American origin shall be turned over to the appropriate Native American group for repatriation.

Arrangements for long-term curation must be established between the applicant/property owner and the consultant prior to the initiation of the field reconnaissance, and must be included in the archaeological survey, testing and/or data recovery report submitted to the City for review and approval. Curation must be accomplished in accordance with the California State Historic Resources Commission's Guidelines for the Curation of Archaeological Collection (dated May 7, 1993) and, if federal funding is involved, 36CFR79 of the Federal Register. Additional information regarding curation is provided in Section II of the Historical Resources Guidelines.

I. Prior to Permit Issuance

A. Land Development Review (LDR) Plan Check.

1. Prior to Notice to Proceed (NTP) for any construction permits, including but not limited

to, the first Grading Permit, Demolition Plans/Permits and Building Plans/Permits, 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, ~~if applicable,~~ 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 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.
 3. Prior to the start of work, the applicant must 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 (1/4 mile radius) has been completed. Verification includes, but is not limited to a copy of a confirmation letter from South Coast 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 1/4 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, 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.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 an

Archaeological Monitoring Exhibit (AME) 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 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.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.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 grading/excavation/trenching activities which could result in impacts to archaeological resources as identified on the AME. The Native American monitor shall determine the extent of their presence during construction related activities based on the AME and provide that information to the PI and MMC. **The Construction Manager is responsible for notifying the RE, PI, and MMC of changes to any construction activities.**
2. The monitor shall document field activity via the Consultant Site Visit Record (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.
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 may reduce or increase the potential for resources to be present.

B. Discovery Notification Process

1. In the event of a discovery, the Archaeological 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 and Native American representative, ~~if applicable~~, 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) 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, 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 the following procedures as set forth in 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).
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 provenience of the remains.
2. The Medical Examiner, in consultation with the PI, ~~shall will~~ determine the need for a field examination to determine the provenience.
3. If a field examination is not warranted, the Medical Examiner will shall 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 ~~shall will~~ notify the Native American Heritage Commission (NAHC) within 24 hours. By law, **ONLY** the Medical Examiner can make this call.
 2. The NAHC ~~shall will~~ contact the PI within 24 hours or sooner, after Medical Examiner has completed coordination.
 3. NAHC ~~shall will~~ immediately identify the person or persons determined to be the Most Likely Descendent (MLD) and provide contact information.
 4. The PI shall coordinate with the MLD for additional consultation.
 5. 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.
- 5.6.Disposition of Native American Human Remains shall be determined between the MLD and the PI, IF:
- a. The NAHC is unable to identify the MLD, OR the MLD failed to make a recommendation within ~~24~~ 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.
 - 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 buried with Native American human remains shall be reinterred with appropriate dignity, pursuant to Section 6.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 Museum of Man for analysis. The decision for internment of the human remains shall be made in consultation with MMC, EAS, the applicant/landowner and the 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 CSVr and submit to MMC via fax by 9am the following morning, ~~if possible,~~ 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.
 - 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 8AM the following morning 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. Submittal of Draft Monitoring Report

1. The PI shall submit two copies of the Draft Monitoring Report (even if negative) 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,
 - 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.
- 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.

3.6.5 Significance of Impact with Mitigation Framework

Although significant impacts to historical resources may be mitigated through review of discretionary projects, specific mitigation at the program EIR level is not available since specific development projects are not known. Therefore, the impact to historical resources is considered significant and unavoidable.

Notes and References

San Diego, City of

—2000 *San Diego Municipal Code, Land Development Code, Historical Resources Regulation*

2004¹ *Historical Resources Guidelines of the Land Development Manual of the Land Development Code*

2006⁷ *Significance Determination Thresholds. Development Services Department. ~~August 2006.~~ January 2007.*

State of California

2007 *CEQA: California Environmental Quality Act Statutes and Guidelines. Office of Planning and Research, Sacramento.*

1989 *Archaeological Resource Management Reports (ARMR): Recommended Contents and Format. Preservation Planning Bulletin No. 4(a). Office of Historic Preservation, Sacramento.*

1991 *Guidelines for Archaeological Research Design. Preservation Planning Bulletin No. 5. Office of Historic Preservation, Sacramento.*

1995 *Instructions for Recording Historical Resources. Office of Historic Preservation, Sacramento.*

U.S. Department of the Interior, National Park Service

1995 "Standards and Guidelines for Archeology and Historic Preservation."

1998 "Standards for the Treatment of Historic Properties."

3.7 HYDROLOGY

3.7.1 Existing Conditions

Regional Hydrology

The San Diego region has diverse topography predominantly made of a series of mountains, mesas, canyons and valleys that provide for the creation of bays, lagoons, lakes, reservoirs, streams, and rivers. A watershed is considered to be all the area above and below ground that drains into a particular water body. Watershed boundaries follow the major ridgelines around river channels and meet where the water flows out of the watershed, usually the mouth of a stream or river. They come in all shapes and sizes and cross jurisdictional, municipal, county, state, and national boundaries. While watersheds can be large or small, every stream, tributary, or river has an associated watershed.

In San Diego County, there are eleven major watersheds west of the Peninsular Range Mountains. These watersheds all ultimately drain to the Pacific coast. Of the eleven major watersheds, seven are within the jurisdiction of the City of San Diego (**Figure 3.7-1**). They are the San Dieguito, Los Peñasquitos, San Diego, Pueblo, Sweetwater, Otay and Tijuana.

City of San Diego Hydrology

Urbanization within the City of San Diego has required modification of the natural hydrology. This modification has been done predominantly in response to flood risk. A storm water conveyance system has been developed to direct storm water into natural, man-made, or partially modified features. This system of drainage is referred to as the Multiple Separate Storm Sewer System (MS4). Water from rain events within the City of San Diego are carried into the MS4, which then drain into receiving waters such as rivers, reservoirs or bays. The MS4 also directs water into the Pacific Ocean (**Figure 3.7-2**).

The hydrology of San Diego is directly affected by absorption rates, drainage patterns, and the rate of surface runoff. An absorption rate is the time required for pervious ground to absorb rain water. Drainage patterns are the footprint of travel of unabsorbed rain water from high elevations to lower elevations. The rate of surface runoff is how quickly water that is not absorbed travels within a drainage system to receiving water. Urbanization increases surface runoff rates by creating more impervious surfaces such as pavement and buildings. These surfaces do not allow percolation of the water down into the soil. Water is instead forced directly into streams, where erosion and siltation can be major problems, as well as increased flood risks.

Increased runoff also increases water pollution because pathogens that normally would be filtered by soils are also drained to receiving waters, which degrades aquatic habitat. As San Diego becomes an increasingly urbanized area, the management of storm water hydrology becomes essential to maintaining a healthy aquatic ecosystem. In addition, effective storm water

management reduces flood risks and provides for increased health, safety and welfare for the residents of San Diego.

Surface/Receiving Waters

The major receiving waters within the City of San Diego include the Pacific Ocean, San Diego Bay, Mission Bay, the San Dieguito River, Los Peñasquitos Creek, the San Diego River, the Otay River and the Tijuana River. Major reservoirs within or managed by the City include Barrett, El Capitan, San Vicente, Hodges, Miramar, Murray, Lower Otay, Upper Otay, and Sutherland. Additionally there are minor receiving waters made up of creeks, channels, streams and lagoons (**Figure 3.7-2**).

Regulatory Setting

Hydrologic resources are protected under the mandates of numerous federal, state and local jurisdictional laws, regulations, and ordinances and these must be considered in the early planning stages of any project. Future projects implemented under the General Plan will be required to adhere to the requirements of these regulations.

Federal

Clean Water Act of 1972. This Act is the principle law governing pollution control and water quality of the Nation's waterways. The objective of this Act is to restore and maintain the chemical, physical and biological integrity of the Nation's waters (33 U.S.C. 1251). **Section 402** of the Clean Water Act controls water pollution through the National Pollutant Discharge Elimination System (NPDES), by regulating point sources that discharge pollutants into waters of the U.S. Implementation of the act is the responsibility of the Environmental Protection Agency (EPA), which has delegated much of that authority to state and regional agencies.

Executive Order 11988, Floodplain Management. The major requirements of this federal order are to avoid support of floodplain development; to prevent uneconomic, hazardous, or incompatible use of floodplains; to protect and preserve the natural and beneficial floodplain values; and to be consistent with the standards and criteria of the National Flood Insurance Program.

The basic tools for regulating construction in potentially hazardous floodplain areas are local zoning techniques. Proper floodplain zoning can be beneficial in the preservation of open space, retention of floodplains as groundwater recharge areas, and directing of development to less flood-prone areas. No further construction without engineered flood protection has been permitted in the area since July 1976, when the City of San Diego was certified as a participant the National Flood Insurance Program.

State of California

State Water Resources Control Board Construction General Permit, 99-08-DWQ.

Construction activities that disturb one or more acres of land that could impact hydrologic

resources must comply with the requirements of this permit. To be in compliance, the applicant for a construction permit must file a complete and accurate Notice of Intent with the state Water Resources Control Board. Compliance requires conformance with applicable best management practices (BMPs) and development of a Storm Water Pollution Prevention Plan. These prevention plans are to contain a site map(s) which shows the construction site perimeter, existing and proposed buildings, lots, roadways, storm water collection and discharge points, general topography both before and after construction, and drainage patterns across the project.

Local

San Diego County Hydrology Manual. The purpose of this manual is to provide a uniform procedure for flood and stormwater analysis within San Diego County. It provides a guide for policies and procedures based upon the science and data available to attain reasonable standardization of hydrology studies throughout the county.

San Diego County Drainage Design Manual. This manual establishes design standards and procedures for storm water drainage and flood management facilities in San Diego County. These design standards and procedures provide guidance for jurisdictions in the selection, design, construction, and maintenance of storm water drainage and flood management facilities.

City of San Diego Drainage Design Manual. This manual is an appendix to the City of San Diego Land Development Manual. It provides a guide for designing drainage and drainage-related facilities for developments within the City of San Diego.

San Diego Regional Water Quality Control Board (Water Board) Order No. R9-2007-0001, NPDES Permit No. CAS0108758. In February of 2001, under the authority of the Clean Water Act amendments and federal Pollutant Discharge (NPDES) Permit regulations, the Water Board issued the order to the 18 cities within San Diego County, and the Port of San Diego. (This order requires that all jurisdictions within the San Diego region prepare Jurisdictional Urban Runoff Management Plans). Each of these jurisdictional plans must contain a component addressing construction activities and a component addressing existing development.

City of San Diego Jurisdictional Urban Runoff Management Program. This document is a total account of how the City of San Diego plans to protect and improve the water quality of rivers, bays and the ocean in the region in compliance with the Water Board permit referenced above. The document describes how the City incorporates storm water best management practices into land use planning, development review and permitting, City capital improvement program project planning and design, and the execution of construction contracts.

City of San Diego Storm Water Standards Manual. This manual requires that urban runoff pollution issues be specifically addressed in development planning for public and private projects. In addition to considering alternative site design approaches and instituting source controls (i.e. methods to keep pollutants out of contact with storm water), structural treatment devices or storm water Best Management Practices are required.

3.7.2 Thresholds of Significance

A significant impact could occur if implementation of the General Plan:

- Results in changes in absorption rates, drainage patterns, or the rate of surface runoff.

3.7.3 Impact Analysis

Could the implementation of the Draft General Plan result in changes in absorption rates, drainage patterns, or the rate of surface runoff?

Generally, absorption rates, drainage patterns, or the rate of surface runoff has already been modified or established as a result of urbanization throughout the City of San Diego's history of development. In the past, the pattern of development in San Diego has occurred on large vacant tracks of land. Currently, vacant land considered to be developable accounts for 3.6 percent or 6,756 acres of the City's total acreage. Due to the limited amount of vacant land, much of the City's future growth will be in the form of infill and redevelopment. The Draft General Plan calls for future growth to be focused into mixed-use activity centers. Implementation of the Plan would result in infill and redevelopment occurring in selected built areas, which would be identified through the community plan update/amendment process. The Draft General Plan would also guide the development of remaining developable vacant land.

Redevelopment and infill development could have impacts on existing absorption rates, drainage patterns, or the rate of surface runoff. As future development occurs, projects will be evaluated based on their conformance with the updated General Plan, the appropriate community plan and established development regulations. If during redevelopment, the density of the area is intensified, natural vegetated pervious ground-cover could be converted to impervious surfaces such as paved highways, streets, rooftops, and parking lots. Unlike natural vegetated soils, pavement and concrete cannot absorb rainwater. The introduction of new or expanded impermeable surface areas can potentially affect absorption rates, drainage patterns, or the rate of surface runoff.

The General Plan Village Propensity Map identifies areas that already exhibit village characteristics, and areas that may have a propensity to develop as villages due to existing or community plan designated multifamily housing, parks, schools, fire stations, and higher frequency transit routes. Although actual village locations will be determined by forthcoming community plan updates and have not been determined at this time, the Propensity Map identifies areas where village designations are more likely to occur. The Village Propensity map identifies areas of high propensity in the following watersheds: San Dieguito, Los Peñasquitos, San Diego River, Pueblo, Otay, and Tijuana.

Within the Draft General Plan Conservation Element there is policy language calling for management of floodplains to address their multi-purpose use, including natural drainage, habitat preservation, and open space and passive recreation, while also protecting public health and safety. This policy will help avoid impacts by establishing the importance of conserving natural drainage features, and limiting the alteration of existing watersheds. Development, as a result of

plan implementation, will also have to comply with all existing regulations pertaining to existing absorption rates, drainage patterns, or rates of surface runoff. Any development that could potentially alter absorption rates, drainage patterns, or rates of surface runoff would be required to implement design measures to maintain pre-construction flow patterns. Developments that would divert the flow of water from one basin onto another would be required to utilize detention basins that would capture the water from the impacted basin. The detention basin would then slowly release this water into the new drainage basin at a velocity that would be low enough to avoid erosion in the drainage courses of that drainage basin.

Development projects are subject to review by the Development Services Department. Under their review, all projects will be required to be sited and designed to minimize adverse effects on absorption rates, drainage patterns, and rates of surface runoff. In addition, any project that causes impacts to hydrologic resources will be subject to mitigation measures in accordance with the requirements of the City of San Diego and other appropriate agencies. This will be accomplished prior to approval of any discretionary permit. Although the City will work extensively to ensure compliance from all public and private projects, strict enforcement of all applicable regulations may not always be achieved. Therefore, there is potential for significant unavoidable impacts to occur within the project area.

3.7.4 Mitigation Framework

Goals, policies, and recommendations enacted by the City combined with the federal, state, and local regulations described above provide a framework for developing project level hydrological resource protection measures for future discretionary projects. The City's process for the evaluation of discretionary projects includes environmental review and documentation pursuant to CEQA as well as an analysis of those projects for consistency with the goals, policies and recommendations of the General Plan. Future projects must be sited and designed to minimize impacts to absorption rates, drainage patterns, and rates of surface runoff in accordance with City requirements and other appropriate agencies including the San Diego Regional Water Quality Control Board. Such siting and design may include implementation of the mitigation framework measures identified in **Section 3.17.4** (see Water Quality section).

In general, implementation of the above policies and compliance with the federal, state, and local regulations would preclude hydrology impacts. Compliance with the standards is required of all projects and is not considered to be mitigation. However, it is possible that for certain projects, adherence to the regulations may not adequately avoid or reduce impacts, and such projects would require additional measures. These additional measures would be considered for each future discretionary project requiring mitigation (i.e., measures that go beyond what is required by existing regulations). Site-specific measures will be identified that reduce significant project-level impacts to less than significant or the project level impact may remain significant and unavoidable where no feasible mitigation exists. Where mitigation is determined to be necessary and feasible, these measures will be included in a Mitigation Monitoring and Reporting Program (MMRP) for the project.

The generalized Hydrology and Water Quality mitigation measures provided in the EIR may be updated, expanded and refined when applied to specific future projects based on project-specific design and changes in existing conditions, and local, state, and federal laws.

3.7.5 Significance of Impact with Mitigation Framework

At this time, no specific projects have been proposed, and therefore it is not possible to propose feasible mitigation measures to reduce project-level impacts, it is infeasible in this program level EIR to provide specific mitigation that would reduce any future impacts to a less than significant level. As such, significant unavoidable impacts related to absorption rates, drainage patterns, or rates of surface runoff remain.

Notes and References

City of San Diego.

2003A *City of San Diego Jurisdictional Urban Runoff Management Plan*. January 2003.
Retrieved from: <http://www.sandiego.gov/stormwater/program/urmp.shtml> on
January 2, 2007.

2003B *City of San Diego Stormwater Standards Manual*. May 2003.

2004 *City of San Diego Drainage Design Manual*. September 2004.

San Diego County.

2003 *San Diego County Hydrology Manual*. June 2003.

2005 *San Diego County Drainage Design Manual*. July 2005.



THE CITY OF SAN DIEGO General Plan

Program Environmental Impact Report

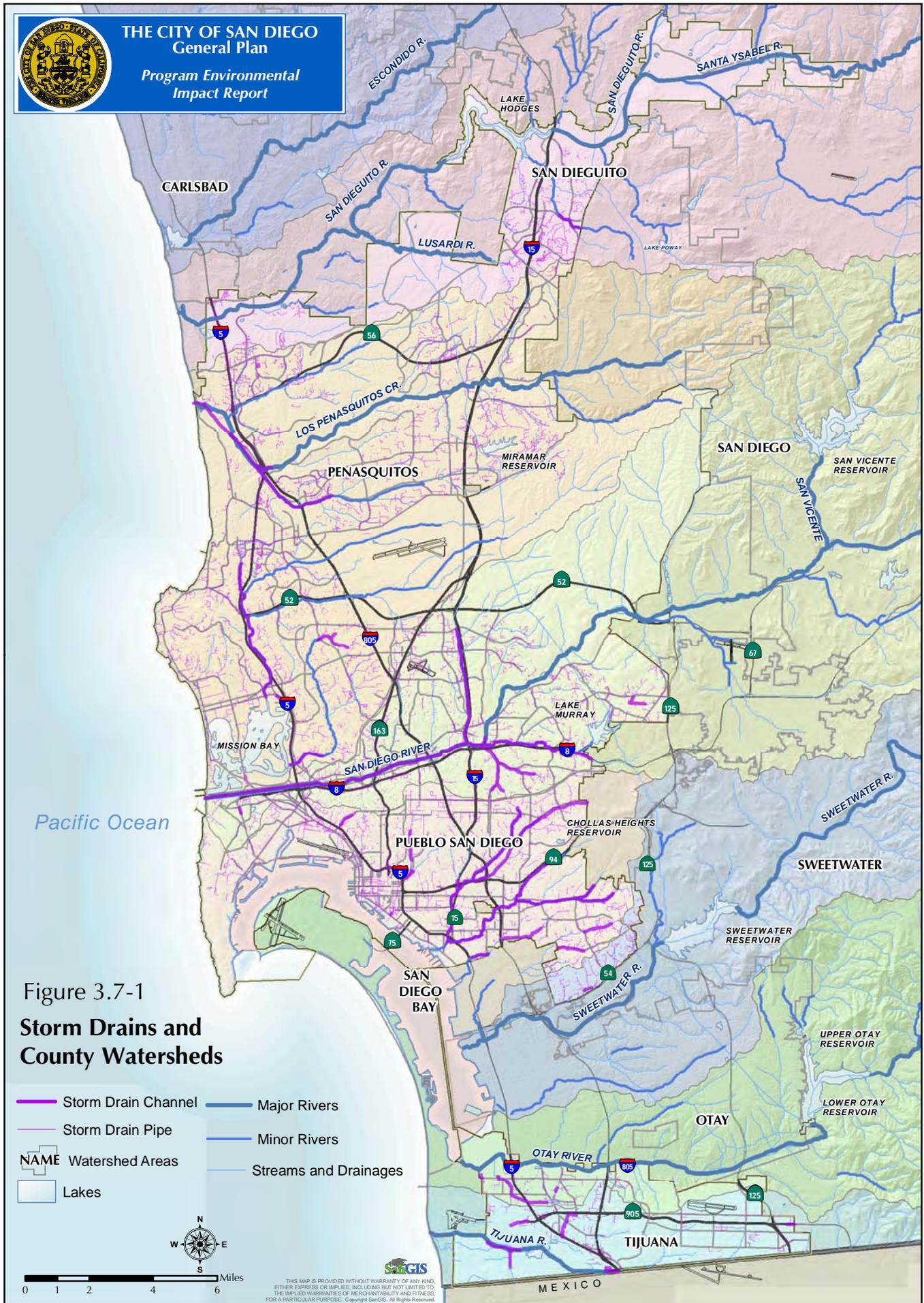


Figure 3.7-1
**Storm Drains and
 County Watersheds**

- Storm Drain Channel
- Storm Drain Pipe
- NAME Watershed Areas
- Lakes
- Major Rivers
- Minor Rivers
- Streams and Drainages



0 1 2 4 6 Miles

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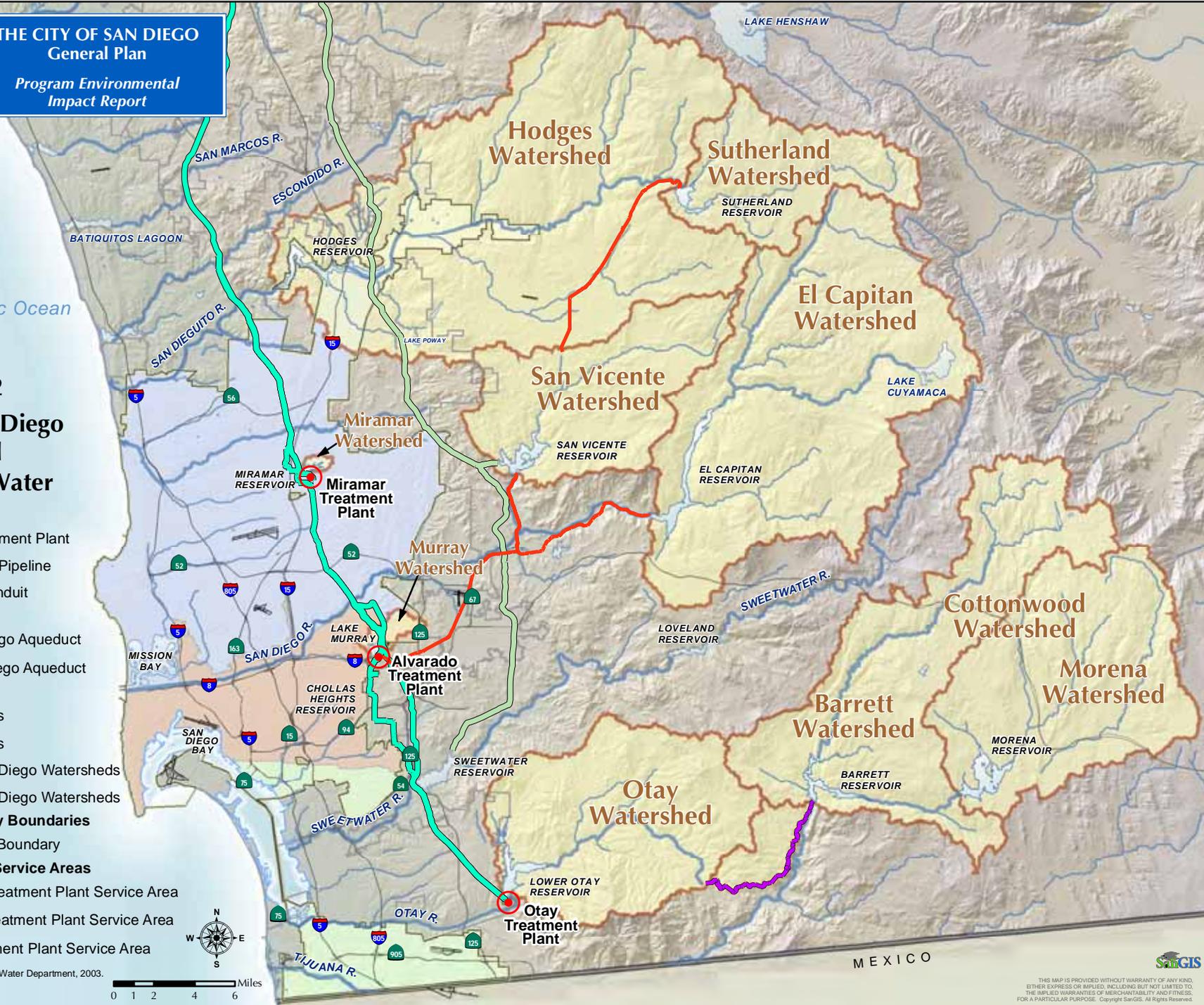


THE CITY OF SAN DIEGO General Plan

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Figure 3.7-2
City of San Diego
Surface and
Receiving Water
Systems

- Water Treatment Plant
- Raw Water Pipeline
- Dulzura Conduit
- Pipelines**
 - 1st San Diego Aqueduct
 - 2nd San Diego Aqueduct
- Water Sources**
 - Major Rivers
 - Minor Rivers
- City of San Diego Watersheds**
 - City of San Diego Watersheds
 - City of San Diego Watersheds
- City Water Supply Boundaries**
 - Watershed Boundary
- Treatment Plant Service Areas**
 - Alvarado Treatment Plant Service Area
 - Miramar Treatment Plant Service Area
 - Otay Treatment Plant Service Area



Source: City of San Diego, Water Department, 2003.



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3.8 LAND USE

3.8.1 Existing Conditions

Existing Land Use Patterns

The City of San Diego encompasses approximately 219,241 acres. **Table 3.8-1** and **Table 3.8-2** summarize the City's acreage distribution in terms of existing uses and planned land use designations. Existing uses represent those uses as they are presently found. Planned land uses are the recommended land use designations that are identified in the adopted community plan. Existing land uses may not always match the adopted planned land use designations. For example, a site may have agricultural uses on it while the planned land use designation calls for residential use. Existing uses may be located on sites with planned land use designations that allow other types of uses that have not yet been implemented in accordance with the adopted community. Together, both tables represent the overall distribution of land use within the City. **Figure 3.8-1** displays generalized land use categories distributed across the City.

Table
3.8-1 Existing Uses

General Plan Land Use Category	Existing Uses	
	Acres	% of Total
Agriculture	6,055	2.8
Commercial Employment, Retail, and Services	7,887	3.6
Industrial Employment	8,928	4.1
Institutional, Public and Semi-Public Facilities ^a	37,103	16.9
Multiple Use	--	--
Park, Open Space and Recreation ^b	60,654	27.6
Residential	52,389	23.9
Roads / Freeways / Transportation Facilities ^c	31,291	14.3
Water Bodies ^c	6,932	3.2
Vacant ^c	8,002	3.6
TOTAL	219,241	100.0

a. This land use category includes 26,547 of existing acres of military use.

b. This land use category includes 2,578 acres of water bodies that are recreational areas and located within park and open space areas.

c. Not a General Plan land use category, however, it is included to provide an accurate account for total acreage in the City. Water bodies identified here are not for recreational purposes.

According to the existing land uses identified on **Table 3.8-1**, the largest existing use of land in the City of San Diego, at nearly 28 percent, consists of parks, open space and recreation areas.

The next largest existing use of land is for residential uses at nearly a quarter of the City's total acreage, or 23.9 percent. Industrial uses make up over four percent and commercial uses consist of less than four percent of the total acreage in the City. Institutional facilities, which include approximately 70 percent military uses, account for almost 17 percent of San Diego's existing land. Agriculture accounts for 2.8 percent of existing use. A slight difference in land use allocation is apparent when comparing **Table 3.8-1** with **Table 3.8-2**.

**Table
3.8-2 Planned Land Uses**

General Plan Land Use Category	Adopted Community Plan Planned Land Uses	
	Acres	% of Total
Agriculture	3,670	1.7
Commercial Employment, Retail, and Services	6,114	2.8
Industrial Employment	12,278	5.6
Institutional, Public and Semi-Public Facilities ^a	36,545	16.7
Multiple Use	4,534	2.1
Park, Open Space and Recreation ^b	62,686	28.5
Residential	55,987	25.5
Roads / Freeways / Transportation Facilities ^c	30,495	13.9
Water Bodies ^c	6,932	3.2
Vacant ^c	--	--
TOTAL	219,241	100.0

a. This land use category includes 26,547 of planned acres of military use.

b. This land use category includes 2,578 acres of water bodies that are recreational areas and located within park and open space areas.

c. Not a General Plan land use category, however, it is included to provide an accurate account for total acreage in the City. Water bodies identified here are not for recreational purposes.

The City's acreage distribution in terms of existing uses and planned land use designations are grouped into seven Draft General Plan land use categories. Roads/Freeways/Transportation Facilities, Water Bodies and Vacant land use categories are not Draft General Plan land use categories but are used in the tables to depict an accurate account for total acreage in the City.

The seven Draft General Plan land use designations used on **Tables 3.8.1 – 3.8.3** are described below:

Agriculture

The Agriculture land use designation defines areas that are rural in character and very low-density or areas where agricultural uses are predominant. This designation is intended to accommodate a wide range of agriculture and agriculture-related uses such as: dairies; horticulture nurseries and greenhouses; raising and harvesting of crops; raising, maintaining and

keeping of animals; separately regulated agricultural uses; and single dwelling units when applicable.

Commercial Employment, Retail, and Services

The Commercial Employment, Retail, and Services land use designation includes areas identified as Neighborhood Commercial, Community Commercial, Regional Commercial, Office Commercial, Visitor Commercial, and Heavy Commercial. Generally, these areas provide a range of retail, service, civic, hotel, office and occasionally residential uses.

Industrial Employment

The Industrial Employment land use designation includes areas identified as Business Park, Business Park-Residential, Scientific Research, Technology Park, Light Industrial, and Heavy Industrial. Generally, these areas provide a variety of industrial uses which include office, research and development, corporate headquarters and a range of manufacturing, warehousing, storage, wholesale distribution and transportation terminals.

Institutional, Public and Semi-Public Facilities

The Institutional, Public and Semi-Public Facilities land use designation defines areas that are identified as public or semi-public facilities and which offer public and semi-public services to the community. Uses may include but are not limited to: airports, military facilities, community colleges, university campuses, landfills, communication and utilities, transit centers, water sanitation plants, schools, libraries, police and fire facilities, cemeteries, post offices, hospitals, park-and-ride lots, government offices and civic centers.

Multiple Use

The Multiple Use land use designation includes areas identified as Neighborhood Village, Community Village, and Urban Village which are characterized by mixed-use. The Village designations apply to areas that provide varying degrees of housing in a mixed-use setting that is integrated with shopping, civic uses and services.

Park, Open Space and Recreation

The Park, Open Space and Recreation land use designation includes areas identified as Open Space, Population-based Parks, Resource-based Parks, and Private/Commercial Recreation. These areas are generally non-urban in character and may have utility for: park and recreation purposes, passive or active recreation; conservation of land, water, or other natural resources; or historic or scenic purposes.

Residential

The Residential land use designation includes all single-family and multifamily housing within varying density ranges.

Additional land use category information is located in Section B of the Land Use Element of the Draft General Plan.

Vacant land is not a Draft General Plan land use designation; however, as an existing condition it provides a total acreage of land that is considered to be developable or designated for a future use such as a future right of way. **Table 3.8-3** identifies the associated land uses with existing

developable vacant acreage in the City. Developable vacant land accounts for 3.6 percent or 6,756 acres of the City's total acreage.

Table 3.8-3
Breakdown of Vacant Developable Land
in Terms of Planned Land Use Designations

General Plan Land Use Category Planned Land Uses	Vacant Developable Acres	% of Total
Commercial Employment, Retail, and Services	617	9.1
Industrial Employment	2,107	31.2
Institutional, Public and Semi-Public Facilities	702	10.4
Multiple Use	423	6.3
Residential	2,907	43.0
TOTAL ACRES (Vacant Developable)	6,756	100.0

The majority of existing vacant land is designated for residential and industrial land uses. Of the 3.6 percent of land identified as vacant, 43 percent is designated for residential uses while another 31 percent is designated for industrial related uses. With less than four percent of land in the City vacant, future growth will most likely occur in existing urban areas.

Seven Basic Typologies

San Diego's communities can be characterized in seven basic typologies (2006 Draft General Plan Housing Element) as shown on **Figure 3.8-2**. These typologies provide a general description of the pattern of development within the City.

Downtown San Diego – Downtown is a unique high-density community with a mix of high-rise residential, commercial, and institutional development. Downtown San Diego is the City's central core with an evolving urban district and has seen significant redevelopment in recent years. It is located between the San Diego Bay and Balboa Park. This business, cultural, and civic center has been bolstered by the expanded convention center and a new ballpark. Downtown is arranged on a grid-based system and consists of a collection of smaller neighborhoods. The circulation system allows for a walkable system of streets and includes a pedestrian promenade along the San Diego Bay.

Pre World War II Communities – These communities consist of Uptown, Old Town, North Park, Golden Hill, Southeastern, Barrio Logan, and the Mid-City neighborhoods. These older communities were developed gradually during the streetcar era with a grid-based street system from 1880-1930. Many of these communities have a mix of low- to medium-density development and experienced incompatible multifamily infill between 1960 and 1990 that disrupted the original character of these neighborhoods. Commercial development has primarily occurred along major community corridors such as University Avenue and El Cajon Boulevard, and has clustered around major intersections. For this discussion, commercial development in

these communities is characterized as a mixture of pedestrian-oriented storefronts and strip commercial with curb cuts for off-street parking. New development is primarily occurring along major community corridors with multifamily residential and mixed use development.

Coastal Communities – The coastal areas originally developed as seasonal resorts and gradually became desirable year round communities. The coastal communities consist of Midway, Peninsula, Ocean Beach, Mission Beach, Pacific Beach and La Jolla. Many original structures intended to be temporary residences were retained and improved over time. The circulation systems within these communities are essentially based around a grid system with more curvilinear street patterns occurring along the hillsides. Throughout, there is a mix of single- and multifamily development on varying-sized lots with supporting commercial along major corridors. There is demand on under-developed multifamily lots to develop at their maximum density because of the desire to live in these communities. Significant numbers of single-family properties are undergoing expansion and remodels. Commercial development has occurred similarly to that of the Pre World War II communities along major corridors and within small commercial districts or cores. The Coastal Height Limit Overlay Zone was approved by a voter initiative in 1972 (Proposition D) and restricts the height of structures to 30 feet. The 30-foot height limit is a characteristic of all coastal communities and helps preserve public views of natural resource areas. The height limit has contributed to the relatively small scale development along the coast.

Post World War II Suburban Communities – These communities are dispersed across the City and consist of Torrey Pines, Mira Mesa, Clairemont Mesa, Linda Vista, Serra Mesa, Navajo, College Area, Encanto, Skyline-Paradise Hills and Otay Mesa-Nestor. These areas feature expansive single-family housing tracts bounded by garden style apartments on major thoroughfares. They were often developed much more quickly than the earlier communities, with less opportunity for organic growth and infill and they retain essentially the same residential structures that were part of the original development. Redevelopment and infill development is occurring intermittently. Commercial and residential areas tend to have greater separation between uses than in older communities. The residential street system is characterized by curvilinear and meandering streets that primarily serve local residential traffic. Commercial uses are clustered in larger scale strip commercial areas along major intersections and arterials. A few of the post World War II suburbs include significant industrial and employment lands. These uses tend to be located on the edges of the community, separated from residential uses and near freeway access.

Master Planned Suburban Communities – These communities were developed mostly from the 1970s through the present with a high degree of comprehensive planning. The Master Planned Suburban communities consist of Otay Mesa, Tierrasanta and the majority of the neighborhoods in the northern part of the City of San Diego, from Carmel Valley to Rancho Bernardo and Rancho Encantada. Most contain a mix of single-family and low-scale multifamily suburban style development as well as some commercial and employment uses intended to support the residential uses. Neighborhoods are often separated by open space canyons and habitat areas that were preserved concurrently with the original development pattern. Except for occasional individual site redevelopment or a few left over vacant sites these areas of the City are relatively new with little redevelopment occurring. The master planned

communities of the 1970's attempted to create internally balanced communities by including jobs, shopping and residential areas. The most recent master planned communities created after 1990 have incorporated urban village concepts including transit and pedestrian-oriented neighborhood and community centers.

Newer Urban Communities – These areas include University City, Kearny Mesa and Mission Valley. These communities were developed mostly after 1960 with a mix of residential and commercial uses. They differ from other multifamily areas in that the original development intensity in these communities is medium and medium-high density multifamily residential with structured or underground parking. These areas use master plans and specific plans for development and contain a mix of residential, commercial and employment uses. Unlike the master planned communities, these communities provide higher residential density and a greater intensity of commercial and employment uses.

Military, Environmental and Other Limited Development – These areas are typically park land, open space and Multiple Species Conservation Program (MSCP) lands as well as military lands. These lands are not typically developable land and include military lands such as Marine Corps Air Station (MCAS) Miramar, environmental lands such as East Elliot with prime MSCP lands, the Tijuana River Valley and San Pasqual Valley and regional and City parks like Mission Bay Park, Balboa Park. Little, if any, development can be expected in these areas.

Adjoining Jurisdictions

The City of San Diego is the largest incorporated city in San Diego County and borders unincorporated areas of the county, a number of other cities and the US-Mexico border.

County of San Diego – The county of San Diego identifies 23 community and subregional areas throughout the unincorporated county. The unincorporated communities adjacent to San Diego tend to have urbanized land use patterns. (Regional Comprehensive Plan [RCP] Program Environmental Impact Report [PEIR])

Otay sub-region is an unincorporated part of the county that is located east of the City of San Diego's Otay Mesa community planning area and Chula Vista. East Otay Mesa is one of two specific plan areas within the Otay sub-region. It is a relatively flat mesa with mountains at the eastern edge and the Otay River Valley and tributary canyon to the north. East Otay Mesa consists primarily of industrial lands including distribution and warehouse uses due to the proximity to the U.S.-Mexico border (1994 East Otay Mesa Business Park Specific Plan). North of San Diego is the county's San Dieguito community plan area. It is, generally, a low-density estate residential area and is located north of San Diego's Black Mountain Ranch community planning area. A portion of the county's unincorporated community of Lakeside is located along the eastern border of San Diego in the western foothills of the Cuyamaca Mountains on the San Diego River about 21 miles east of downtown San Diego. Lakeside is primarily residential with a rural/suburban character. In addition, two non-contiguous county islands exist within the City of San Diego. The Mira Mesa Island (Davis Ranch) is approximately 77 acres located within the Scripps Miramar Ranch community planning area; and Greenwood Island (Mount Hope Cemetery) is approximately 100 acres located in the Southeastern community planning area.

City of Chula Vista – The city of Chula Vista is the second largest city in the county and is located in southern San Diego County, between National City and the southernmost portion of the City of San Diego. Chula Vista encompasses approximately 52 square miles of land from the San Diego Bay to the Otay Lakes, generally between Sweetwater River and Otay River. (2005 Chula Vista General Plan Final Environmental Impact Report [FEIR]).

Coastal cities – The City of San Diego is bordered in the northwest by the city of Del Mar and the city of Solana Beach. Del Mar and Solana Beach are coastal cities which include older community cores close to the beach with lower density residential development. In addition, the city of Coronado lies west of San Diego Bay. The San Diego-Coronado Bay Bridge, a two-mile long area landmark, connects the island of Coronado to San Diego.

Inland cities to the north - The City of San Diego borders the city of Escondido and the city of Poway to the northeast. These North County inland cities contain predominately large-lot, single-family residences and provide employment in regional commercial, industrial, and office complexes.

Inland cities to the east – Santee, El Cajon, La Mesa and Lemon Grove border San Diego to the east. Each of these cities has an older urban core and well-established residential areas. These cities are experiencing some degree of growth in residential uses and intensification of commercial and employment uses. In addition, El Cajon has significant industrial and commercial activity.

Southern cities – Aside from Chula Vista and portions of the county, southern portions of San Diego also border National City and Imperial Beach. Imperial Beach, similar to other coastal cities, has a community core near the beach area with older residential development. Imperial Beach is bordered by the Pacific Ocean, the San Diego Bay, the City of San Diego and the city of Coronado and does not contain any large tracts of vacant land. (2004 RCP PEIR). National City is the second oldest city in San Diego County and is one of the original suburbs to the City of San Diego. It is located on San Diego Bay, and is bordered by the City of San Diego to the north and east. National City is nearly entirely developed, with a mix of residential neighborhoods and industrial and commercial uses.

Mexico – San Diego’s southern most communities lie along the US-Mexico border. Just south of the international border is the city of Tijuana which is considered the largest city in the Mexican state of Baja California and according to SANDAG, the San Diego-Baja California point of entry is one of the busiest in the Americas. The Tijuana River travels through Tijuana and crosses the international border near the San Ysidro border crossing, creating a natural border between the US and Mexico before it drains into the Pacific Ocean.

Regulatory Framework

The following section describes the planning framework and additional regulatory documents, plans, and policies relevant to land use for the proposed Draft General Plan. The section describes applicable plans, policies, and regulations of regional, state or federal agencies with jurisdiction over the City. These include regional planning documents prepared by San Diego Association of Governments (SANDAG), which address regional growth, transportation and land use in the county of San Diego, the California Coastal Act/Local Coastal Program, Land Development Code (LDC), Community Plans, and the MSCP, among others.

Long Range Plans

Progress Guide and General Plan – The *Progress Guide and General Plan* (1979) together with the adopted Strategic Framework Element (2002) serve as the City’s most current adopted General Plan. The City’s community plans comprise the Land Use Element of the *Progress Guide and General Plan*. The land use plans are implemented, and development is regulated by the sections of the Municipal Code relating to the zoning, subdivision of land, and building regulations. The General Plan is the master document to shape growth in a city or region as described in EIR **Section 2.0**.

Factors influencing this Draft General Plan update include:

- Population forecasts indicate that the City’s population will continue to increase.
- Less than four percent of the City’s land is vacant and available for new development, meaning the City must shift from developing vacant land to reinvesting in existing communities.
- The City faces a significant shortfall in public facilities and services.
- The need to address traffic congestion and other quality of life concerns.
- Housing is increasingly unaffordable and unavailable.

Community Plans – The City has 50 distinct community planning areas, and 42 recognized community planning groups that provide input on planning and development. Each community planning area has its own land use plan that specifically addresses land use distribution and land use designations in more detail than is possible at the Draft General Plan level. Community plans also provide community and site-specific guidance on community facilities, urban design and other aspects of community planning as needed.

The community plan structure is necessary because of the City’s diverse geography, development patterns, and cultural and ethnic communities, and other variations. Community plans provide the level of information that is needed in order to review and assess proposed public and private development projects. However, it is important to emphasize that community plans are policy documents that do not contain regulatory requirements. While the community plan addresses specific community needs, its policies and recommendations must be in harmony with other community plans, the overall Draft General Plan, and citywide policies. In order to maintain consistency between the Draft General Plan and community plans, updates to community plans will be necessary over the next several years.

Precise Plans and Specific Plans – The term “precise plan” is a creation of the City of San Diego. Some community plans contain only broad communitywide policies, and precise plans are used to lay out specifics associated with land uses, public facilities, and design issues. Precise plans have also been used to provide very detailed policies for a small part of a community planning area.

A specific plan can be a policy document alone, or a combined policy/regulatory document, according to State Planning and Zoning Law. In the past, combined policy/regulatory specific plans have been used in the City, notably in Mission Valley. The LDC reflects a policy decision by the City to use the specific plan solely as a policy document, with implementation through

LDC zones. Specific plans are also used at a project level for long-term projects with multiple phases, and in master plan situations.

Public Facilities Financing Plans – In order to address the need for public facilities associated with community plan-recommended land uses, the City prepares Public Facilities Financing Plans (PFFP) as companion documents to community plans. The PFFPs identify major public facilities in the areas of transportation (streets, storm drains, traffic signals, etc.), libraries, park and recreation facilities, police stations and fire stations that are needed to serve the needs of the community over the upcoming years. These documents also identify fees that are necessary to help mitigate costs of public facilities required as a result of development in the communities. The PFFPs are updated as needed due to community plan updates and amendments.

Park and Open Space Plans – In addition to the Draft General Plan and community plans which contain guidelines for growth, development and land use, there are park master plans, canyon plans and resource management plans for special areas of the City which contain environmental goals, policies, and recommendations for park and open space areas.

The *Mission Bay Park Natural Resource Management Plan* (May 1990) contains guidelines managing the natural resources within Mission Bay Park. The plan consists of guidelines for in-water construction, dredging, and buffer zones for nesting sites. The plan recommends that land uses within buffer areas be limited to bikeways, walkways, and passive recreation and buffer zones around terrestrial habitats in Mission Bay Park which exclude any development are as follows: salt marsh-100 feet; salt pan-50 feet; and coastal strand-50 feet.

The *Balboa Park Master Plan* (July 1989) provides direction to protect and recover free and open park land from encroaching uses whenever possible and the Arizona Landfill, Central Operations Station and Inspiration Point must be developed as free and open park land emphasizing multi-use play, picnic and passive uses. Also the plan recommends consolidating special use recreation and sports activities in the Morley Field-East Mesa area, the zoo and the Golden Hill Recreation Center areas.

The *Mission Trails Regional Park Master Plan* – Mission Trails Park was started in 1974 and has become one of the largest urban parks in the United States. Mission Trails encompasses nearly 5,800 acres of both natural and developed recreational acres. Along with Balboa Park and Mission Bay, it provides San Diego residents and visitors a way to explore the cultural, historical, and recreational aspects of San Diego.

The *Carroll Canyon Master Plan* (August 1994) includes design features for the creek channel, a buffer of adjoining upland habitat adjacent to Rattlesnake Canyon and direction on reestablishing native vegetation. As part of the Master Plan, the canyon will serve as a passive open space area that includes a ten usable acre neighborhood park site near Rattlesnake Canyon.

The *Sunset Cliffs Natural Park Master Plan* (July 2005) provides guidelines to direct park planning decisions regarding development and preservation of a 68-acre resource-based park stretching along the Pacific Ocean bordering the western edge of Point Loma. The 18-acre linear section of the park lies to the west of Sunset Cliffs Boulevard between Adair and Ladera Streets. The 50-

acre hillside section, a designated multiple species conservation area, links to the 640-acre Point Loma Ecological Reserve beginning at the Navy property to the south.

The goal of the *Los Peñasquitos Enhancement Plan and Program* (October 1985) is to protect, maintain, and enhance Los Peñasquitos Lagoon system and adjacent uplands in order to perpetuate native flora and fauna characteristic of southern California lagoons, and to restore and maintain the estuarine hydrology. Many of the community plans adjacent to Los Peñasquitos contain related information regarding the Canyon and the preservation of the canyon environment.

The City of San Diego adopted the *Chollas Creek Enhancement Plan* in 2002. It is a comprehensive planning document adopted to preserve and enhance the Chollas Creek system while providing design guidelines for new projects. The document is used in conjunction with other plans to review projects located near Chollas Creek.

Canyon Plans – Many urban canyons have been included in the Multi-Habitat Planning Area (MHPA). As with many urban open space areas, the need exists to balance habitat preservation with passive recreational uses and green space enjoyment. In a coordinated effort, City staff along with Friends of Canyons groups, have been working to prepare a planning guide for canyon enhancement. A number of individual open space areas currently have management plans in place or in process, Carmel Mountain and Del Mar Mesa, Black Mountain Open Space and Tecolote Canyon to name a few. There are also a number of open spaces canyons located in urban areas which provide various opportunities for preservation and trail programs.

The City currently has four river parks at various stages in the planning process: San Diego River Park, San Dieguito River Park, Otay Valley Regional Park, and Tijuana River Valley Regional Park.

The *First San Diego River Improvement Project Specific Plan* (February 1984) contains guidelines for the river corridor and the transportation system. The river corridor is a part of the San Diego River citywide open space system; therefore, it should be accessible to the public. Areas outside the river channel should be landscaped and linked to the river corridor. The First San Diego River Improvement Project states that buffer areas are to be located along the entire length of both sides of the river. At no particular location shall the private development intrude into the floodway proper. The average width of the buffer for the entire area shall not be less than 20 feet. The maximum width of the buffer should be approximately 50 feet. Buffer areas should be widest adjacent to the most sensitive habitat areas. Land uses within the buffer areas should include only the light rail transit corridor, bikeway and pedestrian areas and other passive recreation uses.

The *San Diego River Park Master Plan* (Draft June 2005) – This plan is in draft form. The plan provides definition and guidance for the future development and maintenance of the San Diego River Park. The Plan focuses on seven principles: clean up and restore hydrological function of the river; reclaim the valley as a common space; unify fragmented lands; emphasize a continuum of experience; reveal the valley history; reorient development toward the river; and create a synergy of people, water and wildlife.

The *San Dieguito River Regional Plan* (October 1984) includes land use and Recreation/Open Space recommendations, such as minimizing the alteration of land forms and drainage patterns with special attention to floodplains, canyons, and steep slopes and protect and preserve significant resources and the visual integrity of the San Dieguito River basin as an essentially passive rural area.

The *San Dieguito River Park Concept Plan* (February 1994) contains the following park objective to protect the significant biological resources of the planning area, provide adequate buffers between development and sensitive resources. Functional linkages should be identified and preserved between the San Dieguito River Park and open space preserves to the north and south. The plan promotes the preservation of all significant cultural resources, and recommends the protection and restoration of all historic sites within the planning area. This plan also endorses the proposal to restore the San Dieguito Lagoon and its associated wetlands ecosystem.

The *Tijuana River National Estuarine Sanctuary Management Plan* (February 1986) contains policies and regulations to restrict disturbance of the natural vegetation and wildlife. The Plan requires that the diking, filling, or dredging of open coastal waters, wetlands, estuaries and lakes shall be permitted in accordance with other applicable provisions of this division, where there is no feasible less environmentally damaging alternative, and where feasible mitigation measures have been provided to minimize adverse environmental effects. The Plan contains policies for a buffer area to be established for each development adjacent to environmentally sensitive habitat areas and the buffer should be a minimum of 100 feet for small projects on existing lots, unless the applicant can demonstrate that 100 feet is unnecessary to protect the resources of the habitat area.

The *Otay Valley Regional Park* has an approved Concept Plan. The *Otay River Regional Park Concept Plan* (July 1997) provides policy direction for the three jurisdictions (cities of San Diego and Chula Vista and the county of San Diego) for coordinated land acquisition and future development of the Regional Park. The Plan proposes a boundary; protection of environmentally sensitive areas and important cultural resources in an open space core; identifies areas adjacent to the open space for active and passive recreational development opportunities; includes a regional trail system of approximately 8.3 miles with staging areas and envisions two interpretive centers for environmental and educational programs.

The *County Trails Master Plan and Program* was adopted by the county in 2005. The Plan and Program is a comprehensive planning document adopted to preserve existing trails and to establish new paths to enhance the recreational continuity of trails within the county; both in the incorporated and unincorporated areas. [The City's Pedestrian and Trails Master Plans will be developed in coordination with the County's Trails Master Plan.](#)

Proposition A: The Managed Growth Initiative – In 1985, the electorate adopted Proposition ‘A,’ an initiative amending the *Progress Guide and General Plan* (1979) to require approval of a majority vote of the people for shifting of land from the Future Urbanizing to the Planned Urbanizing Area phase of growth or development. The ballot measure further provided that the “provision restricting development in the Future Urbanizing Area shall not be amended except by majority vote of the people, and except for amendments which are neutral or make the

designation more restrictive in terms of permitting development.”

By 2005, phase shifts, per Proposition ‘A’ and the Guidelines for Future Development, occurred for the land determined to be appropriate for more urban levels of development within the planning horizon of this Draft General Plan. The City also completed planning efforts to address land use in the remainder of the Future Urbanizing Area subject to its jurisdiction.

The City Council adopted a comprehensive update to the San Pasqual Valley Plan that requires the preservation of the San Pasqual Valley for agricultural use, open space, and MHPA. Additionally, the City adopted a specific plan for Del Mar Mesa that severely limits residential development to rural densities and sets aside over half of the plan area as MHPA. Furthermore, federal, state, county and other jurisdictions have participated with the City in planning for open space and habitat preservation in the San Dieguito and Tijuana River Valleys.

Proposition ‘A’ lands also include military and other lands not subject to the City’s jurisdiction. In the past, the City Council has chosen to follow the development intensity restrictions and the requirement for a vote of the people to approve an amendment to shift the area from Future to Planned Urbanizing Area as specified in Proposition ‘A’, upon receipt of jurisdiction over former military installations.

Annexations – The City of San Diego plays a leading role in regional planning. This role includes working with other jurisdictions and agencies in refining the city’s boundaries. Both the state and county support the expansion of cities to provide urban services, rather than the expansion of special districts. Under the authority of the state, the Local Area Formation Commission (LAFCO) regulates, through approval or denial, any boundary changes proposed by a city. Although LAFCO does not have the power to initiate boundary changes on its own, LAFCO coordinates the orderly development of a community through reconciling differences between city and county plans, so the most efficient urban service arrangements are created for the benefit of area residents and property owners.

A “Sphere of Influence” which is used to determine the most logical and efficient future boundaries for cities, is the physical boundary and service area that a city is expected to serve. In 1985, LAFCO determined the City of San Diego’s Sphere of Influence to be co-terminus with its jurisdictional boundaries.

Prospective annexation areas are shown in **Figure 2.2-1** and include two county islands of unincorporated land within the City, and two large unincorporated areas of the county: 4S Ranch/West Rancho Bernardo located north of Highway 56 and Otay Mesa East located adjacent to the Otay Mesa community and the US/Mexico border. The prospective annexation areas are unincorporated areas within the county of San Diego that share common geographic features, land use patterns, and are bordered by the same natural boundaries as the contiguous City area. The county islands consist of the following areas: the Davis Ranch, an approximately 77-acre property, designated for industrial use, located adjacent to Interstate 15 within the Scripps Miramar Ranch Community Planning Area; and the Mount Hope Cemetery, an approximately 100-acre property, designated as a public cemetery, located within the Southeastern San Diego Community Planning Area.

Land located within these prospective areas can be reviewed for the possibility of annexation upon the initiative of either the landowner or the City. LAFCO will determine if the proposed annexation requires an amendment to the Sphere of Influence, or if a Sphere of Influence study is needed prior to an amendment. In either case, LAFCO will also use the above-mentioned factors as part of its decision making process. In addition, future environmental analysis would be necessary as part of any annexation.

Regulations

Land Development Code - Chapters 11-15 of the Municipal Code are referred to as the LDC. These chapters contain the City's planning, zoning, subdivision, and building regulations, with the exception of the planned district ordinance regulations which are contained in Chapter 15. The LDC is one of the tools used to implement the *Progress Guide and General Plan* (1979) and the community plans, which establish the pattern and intensity of land use through the City.

The City of San Diego's zoning and land development regulations were comprehensively updated over a multi-year program. The new LDC became effective in January of 2000. The code offers a toolbox of regulations to implement Draft General Plan and community plan policies including:

Base Zones – Chapter 13 of the LDC contains the citywide base zones as well as specific overlay zones. The five base zones help to ensure that land uses within the City are properly located and that adequate space is provided for each type of use identified. Base zones are intended to regulate uses; to minimize the adverse impacts of these uses; to regulate the zone density and intensity; to regulate the size of buildings; and to classify, regulate, and address the relationships of uses of land and buildings. The five base zones are Open Space, Agricultural, Residential, Commercial and Industrial.

- The **open space zones** are applied to land where the primary use is park or open space or to private land where development must be limited to implement open space policies of adopted land use plans or applicable federal and state regulations and to protect the public health, safety, and welfare.
- The **agricultural zones** are intended to accommodate a wide range of agriculture and agriculture-related uses as well as single dwelling units.
- The **residential zones** are intended to accommodate a variety of housing types and to encourage the provision of housing for all citizens of San Diego. It is also intended that the residential zones reflect desired development patterns in existing neighborhoods while accommodating the need for future growth.
- The **commercial zones** provide distinct regulations for size, intensity, and design of commercial development to provide for the employment, shopping, services, recreation, and lodging needs of the residents of and visitors to the City.
- The **industrial zones** are intended to provide flexibility in the design of new and redeveloped industrial projects while assuring high quality development and to protect land for industrial uses and limit non-industrial uses. The zones accommodate a range of

industrial and manufacturing activities in designated areas to promote a balanced land use and economy and to encourage employment growth.

Overlay Zones – In addition to base zones, Chapter 13 of the LDC contains thirteen specific overlay zones. The overlay zones provide supplemental regulations that have been tailored to specific geographic areas of the City. Overlay zones are applied in conjunction with a base zone and modify or add to the regulations of the base zone to address specific issues such as development adjacent to airports, special height or parking requirements, or supplemental processing requirements. The following are three important overlay zones for the Draft General Plan implementation:

- *Community Plan Implementation Overlay Zone* – The Community Plan Implementation Overlay Zone (CPIOZ) provides supplemental development regulations that are tailored to specific sites within community plan areas of the City. The intent of the regulations is to ensure that development proposals are reviewed for consistency with the use and development criteria that have been adopted for specific sites as part of the community plan update and amendment process.

CPIOZ is characterized as either “Type A” or “Type B” depending upon whether or not the applicable community plans contain specific development standards and criteria or policies and guidelines, respectively, to address development proposals within an identified area. The CPIOZ “Type A” is ministerial (Process One) and no discretionary permit is required if the proposed development complies with the development standards or criteria. Applicants for development proposals within a CPIOZ “Type A” who are unable or unwilling to comply with those standards may process a Site Development Permit (SDP) to request deviations. Often, the community plan provides thresholds within Type A to address different design options. The CPIOZ “Type B” always requires a SDP as the community plan language focuses upon design recommendations and guidelines. Both CPIOZ Type “A” and “B” are useful tools to implement both General Plan and community plan policies.

CPIOZ is applied to the following areas:

- Clairemont Mesa Community: areas on Clairemont Mesa Boulevard, Genesee Avenue, and Clairemont Drive;
- College area: a few areas near San Diego State University;
- Linda Vista Community: along Linda Vista Road, and an area bounded by Interstate 5, Friars Road, and Tecolote Road;
- Centre City: on California Street and Kettner Boulevard;
- Navajo Community: along Mission Gorge Road and Friars Road;
- Pacific Beach: along Mission Boulevard and the coast;
- Peninsula Community: along Rosecrans Street and Nimitz Boulevard;
- Rancho Bernardo Community: next to Interstate 5, along Rancho Bernardo and Bernardo Center Drive;
- Rancho Peñasquitos: one site on Peñasquitos Drive;
- University area: most of the area north of Rose Canyon; and
- Uptown Community: east of Highway 163.

- The *Airport Approach Overlay Zone* provides supplemental regulations for the property surrounding the approach path for San Diego International Airport (SDIA), Lindbergh Field. The intent of these regulations is to help ensure the following:
 - The Federal Aviation Administration (FAA) and California Department of Transportation (Caltrans) airspace protection regulations are satisfied;
 - The San Diego County Regional Airport Authority (Airport Authority) is provided the opportunity to participate in the evaluation process; and
 - Minimum vertical buffers are provided between the FAA-established airspace protection surfaces and structures constructed within the approach path.
- The *Airport Environs Overlay Zone* provides supplemental regulations for property surrounding Brown Field, Montgomery Field, SDIA at Lindbergh Field, and MCAS Miramar. Although the intent of these regulations is to ensure that land uses are compatible with the operation of airports by implementing the Airport Land Use Compatibility Plans (ALUCPs). The boundaries for the Airport Environs Overlay Zone boundaries cover less area than the boundaries of the airport influence areas used by the ALUCPs.

The following are additional overlay zones that are used to implement various regulations in specific areas of the City:

- *Coastal Overlay Zone*
- *Coastal Height Limit Overlay Zone*
- *Sensitive Coastal Overlay Zone*
- *Mobilehome Park Overlay Zone*
- *Parking Impact Overlay Zone*
- *Residential Tandem Parking Overlay Zone*
- *Transit Area Overlay Zone*
- *Urban Village Overlay Zone*
- *Mission Trails Design District*
- *Clairemont Mesa Height Limit Overlay Zone*

Planned District Ordinances – Planned District Ordinances are an earlier regulatory system made up of 20 individual zoning codes, separate from the citywide zoning code. The PDOs were created prior to 2000, during a time when the Municipal Code was incapable of protecting unique community features. The Land Development Code, which became effective in January 2000, includes a variety of tools to implement adopted policy, particularly to address land use and design. The City is in the process of a comprehensive PDO update to apply existing Land Development Code tools where possible modify or develop new measures when necessary, and complete implementation of the City’s Zone Code Update. The PDO update is expected to improve predictability and consistency in application of the City’s regulations by providing a single source for zoning and development regulations (Land Development Code), that implements the policies of the General Plan and Community Plans, and protects the unique features of each community.

Land Development Manual – The Land Development Manual is a companion manual to the Land Development Code. The Land Development Manual provides information to assist in the processing and review of development applications. Volume I establishes requirements for the submittal of applications, including the identification of required fees and deposits. Volume II establishes development standards and guidelines used in the review of applications. Volume II consists of the following information: Biology Guidelines, Coastal Bluffs and Beaches Guidelines, Deviations From Environmentally Sensitive Lands Regulations Within the Coastal Overlay Zone, Historical Resources Guidelines, Landscape Standards, and Steep Hillside Guidelines. The appendices include a number of manuals that were originally adopted in advance of the Land Development Manual.

General Development Regulations – Additional development regulations are found in the LDC. These regulations are intended to regulate specific uses that may be desirable and appropriate in a particular zone if limitations or conditions are placed on the development of those uses to minimize detrimental effects to neighboring properties or incompatibility with the permitted uses of the base zones.

Planned Development Permits – Planned Development Permits provide a process for projects that request to deviate from the strict application of development regulations. The process encourages imaginative and innovative planning and design to assure the development achieves the purpose and intent of land use plans.

Site Development Permits – The Site Development Permit is required for proposed development that, because of its site, location, size, or some other characteristic, may have significant impacts on resources or on the surrounding area, even if developed in conformance with all regulations. The intent of this discretionary permit 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. Site Development Permits often used for sites which contain Environmentally Sensitive Lands, historic structures, and sites within Planned District Ordinances and various overlay zones. .

Environmentally Sensitive Lands Regulations (ESL) – ESL regulations help protect, preserve, and restore lands containing steep hillsides, sensitive biological resources, coastal beaches, sensitive coastal bluffs, or Special Flood Hazard Areas. The intent of the ESL regulations is to assure that development occurs in a manner that protects the overall quality of the resources, encourages a sensitive form of development, retains biodiversity and interconnected habitats, maximizes physical and visual public access to and along the shoreline, and reduces hazards due to flooding in specific areas while minimizing the need for construction of flood control facilities.

State/Federal Programs

California Coastal Act/Local Coastal Program – The City’s community plans located within the State Coastal Zone Boundaries must be certified by the California Coastal Commission (Coastal Commission) as being appropriate to implement the Coastal Act. Community planning areas wholly or partially located within the Coastal Zone include: Barrio Logan/Harbor 101, Ocean Beach, Carmel Valley, Otay Mesa/Nestor, Del Mar Mesa, Pacific Beach, La Jolla, Pacific Highlands Ranch, Midway/Pacific Highway Corridor, Peninsula, Mira Mesa, Torrey Hills,

Mission Bay Park, Tijuana River Valley, Mission Beach, Torrey Pines, North City Future Urbanizing Area, San Dieguito River Valley, North City Local Coastal Program, and University. **Figure 3.8-3** shows the Coastal Zone boundaries within the City of San Diego. Within the Coastal Zone, there are several categories of land associated with different types of permit authority. The City of San Diego has the authority to issue Coastal Development Permits for areas of the Coastal Zone where the Coastal Commission has certified the Local Coastal Program (LCP) land use plan and related implementation program in the form of code regulations. This constitutes a majority of the area within the Coastal Zone and these areas are known as “Coastal Commission certified areas.” These certified areas can lie within appealable as well as nonappealable areas. For instance, if a Coastal Development Permit falls within the appealable area, then the decision involving this development is appealable to the Coastal Commission. On the other hand, if a coastal development permit falls within the nonappealable area, then the decision rests with the City and is not appealable to the Coastal Commission.

“Areas of deferred certification” constitute another category of land in the Coastal Zone. In these areas, the Coastal Commission has not yet certified the City’s land use plan, and therefore retains coastal development permit authority. There are also “areas of original jurisdiction” or “Coastal Commission permit jurisdiction” that are not a part of the City’s LCP and where the Coastal Act jurisdiction and permit authority to remain with the Coastal Commission.

California Land Conservation Act of 1965 (Williamson Act) – The Williamson Act, codified at Government Code section 51200 et seq., was enacted for the purpose of allowing cities and counties to preserve agricultural land via voluntary contracts with the landowners. The process requires public notice of the intent to establish the preserve, including a legal description or an assessor’s parcel number. The preserve must be at least 100 acres, unless the city or county finds that smaller preserves are necessary due to unique characteristics of the agricultural enterprises in the area and that the establishment of the smaller preserves is consistent with the general plan.

The landowner receives the benefit of having the land taxed at a rate consistent with its actual use, instead of the potential market value. The City of San Diego is already exempt from paying taxes on property it owns and therefore, the Williamson Act does not apply to land owned by the City of San Diego. There are no Williamson Act lands within the City of San Diego.

Surface Mining and Recovery Act of 1975 – In accordance with classification guidelines established by the State Mining and Geology Board and in compliance with the Surface Mining and Recovery Act of 1975 (SMARA), the State Geologist is required to classify, on the basis solely of geological factors and without regard to existing land use and ownership, the following:

- Areas containing significant mineral deposits; or
- Areas containing little or no mineral deposits;
- Areas containing mineral deposits, the significance of which requires further evaluation.

The State Mining and Geology Board subsequently defined the above categories into Mineral Resource Zones (MRZs). These zones are established based on the presence or absence of substantial sand and gravel deposits and crushed rock source areas. Please see **Section 3.9** Mineral Resources for more detailed information.

Military Installations – There are a number of military installations adjacent to and within the City of San Diego borders. The installations vary in purpose and size. **Figure 3.8-4** depicts the military installations in San Diego and within close proximity. These include: Marine Corp Air Station Miramar, Marine Corp Recruit Depot, Naval Medical Center San Diego, Space and Naval Warfare Systems Center, Fleet Supply Center San Diego, Fleet Anti-Submarine Warfare Training Center, Naval Station San Diego, Naval Submarine Base San Diego, Naval Air Station North Island, Naval Amphibious Base Coronado, Silver Strand Training Complex, Imperial Beach Naval Outlying Landing Field.

Adjoining Jurisdictions – General Plans and Policy Documents

Three large jurisdictions contain most of the population and control much of the land use in southwestern San Diego County. They are the City of San Diego, the county of San Diego, and the city of Chula Vista. The jurisdictions are tied together through the City's Metro Wastewater System. The three jurisdictions make up the bulk of the subregional habitat preserve planning effort, the MSCP. The three jurisdictions jointly plan regional parks. While the county and Chula Vista are not yet constrained with dwindling vacant land, all three have embarked on an effort to update their respective General Plans. Chula Vista recently adopted their General Plan update in 2005.

County of San Diego General Plan 2020 – The General Plan 2020 is a multi-year project that began in August of 1998, to update the San Diego County general plan. The current general plan for the unincorporated county has not been fully updated since 1979 and has been substantially modified over the years. Since 1979, significant growth and change has occurred which has led to the incorporation of coastal cities and to the annexation of lands on the fringes of the unincorporated areas such as Otay Ranch and Montgomery area into the city of Chula Vista and various county "islands" (e.g., Miramar Ranch North) into the City of San Diego.

General Plan 2020 will establish a framework by enabling the unincorporated communities to grow, thereby shaping the future of the county. The outcome will be an updated county general plan which protects the environment, focuses population growth to specified areas, and provides adequate public facilities and services for the additional citizens. This comprehensive planning document encourages development in the western portion of the county near existing infrastructure. The update also includes adjustments to community planning area boundaries, and replaces residential lot size requirements with a density-based approach.

The county's general plan update assumes that most elements and the unincorporated community plans will be updated concurrently. This effort could take several years. The county's effort differs from the City's effort in that the City General Plan Update is phased with incremental approvals.

City of Chula Vista General Plan - The city of Chula Vista recently completed their comprehensive general plan update. Most current planned growth would occur in large master planned communities in eastern Chula Vista, including the 23,000-acre Otay Ranch. This expansion area has an expected population of approximately 68,000. The buildout of this area may extend beyond 2020. Otay Ranch has been planned as a series of villages with core densities averaging from 14.5 to 18 dwelling units per acre (gross) depending on whether

planned transit ways traverse the villages. In these villages, rights-of-way for future rapid transit extensions have been reserved.

The General Plan update examines existing neighborhoods to determine what areas are likely to remain stable and where transitional areas exist where revitalization and intensification may be appropriate to accommodate future anticipated growth. This would focus upon some of Chula Vista's older portions, generally west of Interstate-805 and along Interstate-5. These areas include the city of Chula Vista's urbanized core and redevelopment areas, and some of the prime candidates for infill projects with mixed-use and higher densities.

A joint program, the South Bay Transit First Program, with Chula Vista and other jurisdictions, is refining proposed transit routes and station locations to provide a framework for identifying areas where transit supportive land uses are appropriate in this area.

General Plan profiles of adjacent jurisdictions – Adjacent jurisdictions to San Diego are generally urbanized with limited vacant land. Most of the cities are experiencing varying degrees of growth in residential uses and intensification of commercial and employment uses. Each municipality adjacent to the City of San Diego has a General Plan which is regularly consulted and used for project review and guidance.

There are 12 jurisdictions bordering the City of San Diego. The jurisdictions are: Imperial Beach, San Diego County, Chula Vista, National City, La Mesa, Lemon Grove, El Cajon, Santee, Poway, Del Mar, Escondido and Mexico. A majority of the jurisdictional boundaries are characterized by contiguous or complementary land uses within 1000 feet. However, there are a few discrepancies between jurisdictions. The most notable discrepancy is along the Chula Vista-San Diego border between the I-5 and I-805. On the north side of the boundary, Chula Vista maintains mostly industrial land, which borders the open space area of the Otay River Valley located within San Diego's southern boundary. To the west, Imperial Beach multifamily residential land uses and the Imperial Beach Naval Outlying Landing Field which includes an airport border single and multifamily residential land in San Diego. To the east, landfills located in the county and Santee border City of San Diego open space. To the northeast, industrial land within the city of Poway is located within 1000 feet of City of San Diego open space. Along the northwest border, Del Mar single-family residential land uses border City of San Diego open space. To address multi-jurisdictional adjacency land use issues, jurisdictions are notified of and asked to comment on proposed land use plan amendments and updates. The plan amendment and update review process allows interested individuals, groups, organizations and other government agencies to raise concerns about proposed land use designations and changes to adopted land use plans. The review process is intended to identify and address possible land use incompatibilities and potential impacts, including impacts to adjacent jurisdictions.

The land uses located in San Diego along the US-Mexico border consist of open space, commercial and industrial land uses. The Tijuana River Valley sits along the western portion of the border and is primarily open space in the form of abandoned agricultural lands, estuary and beach. South of the Tijuana River Valley is the US-Mexico border which is adjacent to residential and mixed use development in Tijuana. Near the international border entrance at I-5, San Diego commercial land uses are adjacent to commercial uses in Tijuana. To the east, San Diego open space along the border is adjacent to residential and mixed-use development in

Tijuana and further east industrial land uses in Otay Mesa are adjacent to Tijuana's Rodríguez International Airport, multifamily housing and scientific research uses.

A regional effort to address planning related issues along a portion of the border has been established. SANDAG and the city of Tijuana's Municipal Planning Institute (Instituto Municipal de Planeación or IMPlan) are working on the development of the Otay Mesa-Mesa de Otay Binational Corridor Strategic Plan. The study area encompasses the City of San Diego's Otay Mesa community planning area, the county of San Diego's East Otay Mesa community planning area, including Otay Lakes, the eastern portion of the city of Chula Vista east of Interstate 805 (I-805) and south of Olympic Parkway, and the planning areas of Mesa de Otay and Centenario, including the Alamar River in the city of Tijuana. This border region has been identified as an opportunity to create an effective binational planning partnership.

Transportation, housing, economic development, and environmental conservation are four key issue areas that have been identified for evaluation as part of the Otay Mesa – Mesa de Otay Binational Corridor Strategic Plan. A Draft Early Action Plan was released for comment in June 2006 (2006 SANDAG).

Airport Land Use Compatibility Plans – The Airport Authority, which serves as the state designated Airport Land Use Commission (ALUC) for San Diego County, adopts the Airport Land Use Compatibility Plans. The Airport Land Use Compatibility Plans serve as a tool for use by the ALUC in conducting reviews of proposed land use in the areas surrounding airports and assists the City of San Diego, as an affected local land use jurisdiction, in the preparation or amendment of land use plans and ordinances, including the General Plan. Currently, there are five adopted Airport Land Use Compatibility Plans in place within the City land use jurisdiction that include the San Diego International Airport, MCAS Miramar, Brown Field Municipal Airport, and Montgomery Field Municipal Airport. Compatibility Plans have not been prepared for Naval Air Station North Island or Naval Outlying Field Imperial Beach.

In 2004, the Airport Authority amended the Airport Land Use Compatibility Plans to incorporate new ALUC policies into the existing Comprehensive Land Use Plans that SANDAG adopted in the 1980s and 1990s when it served as the ALUC for San Diego County. The Airport Authority is currently in the process of preparing new Airport Land Use Compatibility Plans for all of the public and military airports within the county. It is expected that the ALUC will adopt these updated Airport Land Use Compatibility Plans separately at different points during the next two years.

The purpose of the Airport Land Use Compatibility Plans is two-fold: 1) to provide for the orderly growth of airports and the area surrounding the airports within the jurisdiction of the ALUC; and, 2) to safeguard the general welfare of inhabitants within the vicinity of the airports, and the public in general. The Airport Land Use Compatibility Plans address compatibility between airport operations and future land uses that surround them by providing policies and criteria for aircraft overflight, safety, and airspace protection concerns to minimize the public's exposure to excessive noise and safety hazards within the airport influence areas for each airport over a 20 year horizon. Since the ALUC does not have land use authority, the City implements the compatibility plan through land use plans, development regulations, and zone ordinances.

State law requires the City as an affected local jurisdiction in the environs of airports to submit its General Plan and subsequent amendments to the ALUC for a consistency determination prior to adoption. Once submitted, the ALUC will determine if the General Plan is consistent. If the ALUC determines that the General Plan is inconsistent, the City can modify its general plan and applicable land use plans (community plan, precise plans and specific plan) and zoning ordinances to make them consistent with the Airport Land Use Compatibility Plans or to take the steps necessary to overrule the ALUC. At the same time, when an action is proposed to amend or update a land use plan, airport plan, development regulation, and zoning ordinance within an airport influence area, the City is required to submit these actions to the ALUC for a consistency determination prior to adoption of the action. When the ALUC amends or updates a compatibility plan, the state law requires the City to submit the General Plan and applicable land use plans that are within an airport influence area to the ALUC within 180 days for a consistency determination.

Air Installations Compatible Use Zones (AICUZ) Study – The federal government requires that the military develop AICUZ studies for military air installations. An AICUZ study establishes land use strategies and noise and safety recommendations to prevent the encroachment of incompatible land use from degrading the operational capability of military air installations. In 2005, the Marine Corps published an updated AICUZ study for MCAS Miramar. The Navy is in the process of updating the AICUZ studies for Naval Air Station North Island and Naval Outlying Field Imperial Beach and anticipates publishing the AICUZ studies by mid to late 2007. State law requires that the Airport Land Use Compatibility Plans be consistent with the AICUZ studies. Once published, the Airport Authority, acting as ALUC, will address the AICUZ study strategies and recommendations as part the Airport Land Use Compatibility Plans update for military installations within the county.

San Diego Unified Port District Port Master Plan – The Port of San Diego is a special government entity, created in 1963 by an act of the California legislature in order to manage San Diego Harbor, and administer the public lands along San Diego Bay. The port master plan was adopted and certified by the Coastal Commission 1981 and was last amended in 2004. The master plan provides the official planning policies, consistent with a general statewide purpose, for the physical development of the tide and submerged lands conveyed and granted in trust to the San Diego Unified Port District. The City of San Diego controls a small amount of the San Diego Bay tideland area, which is occupied by the City Sewer Pump Station No.2 on Harbor Drive near Lindbergh Field.

San Diego Association of Governments (SANDAG) – SANDAG serves as a forum for public decision making on regional issues such as growth, transportation, and land use in San Diego County and is comprised of representatives from each of the county's local jurisdictions, including the City of San Diego. SANDAG programs such as the RCP and Regional Transportation Plan (RTP) are pertinent to the City of San Diego's General Plan efforts. These programs are summarized below.

Regional Comprehensive Plan (RCP) – The RCP is the long-range planning document developed to address the region's housing, economic, transportation, environmental, and overall quality-of-life needs. The City of San Diego's General Plan is intended to complement this plan and encourage smart growth principles. Goals of the RCP are to establish a planning framework

and implementation actions that increase the region's sustainability and encourage smart growth. The plan seeks to achieve sustainability through planning and development that meets economic, environmental, and community needs, without jeopardizing the ability of future generations to meet these needs. Smart growth principles are provided to create a compact, efficient and environmentally-sensitive pattern of development that provides people with additional travel, housing and employment choices by focusing future growth away from rural areas and closer to existing and planned job centers and public facilities. The RCP contains an incentive-based approach to encourage and channel growth into existing and future urban areas and smart growth communities. Basic "smart growth" principles (SANDAG Smart Growth Definition, Principles and Designations) designed to strengthen land use and transportation integration are summarized as follows:

- Emphasize pedestrian-friendly design and mixed-use development.
- Provide a variety of travel choices (walking, biking, rail, bus, and automobile).
- Provide employment opportunities near major housing areas.
- Provide a variety of housing types.
- Create walkable neighborhoods.
- Foster distinctive, attractive communities with a strong sense of place.
- Preserve open space, natural beauty, and critical environmental areas.
- Provide adequate infrastructure and strengthen and direct development towards existing communities.
- Encourage community and stakeholder collaboration in development decisions.

Regional Transportation Plan (RTP) – The current RTP, called MOBILITY 2030, serves as a blueprint to address the mobility challenges created by the San Diego region's growing population and employment. It represents a long range plan for highways, major bus routes, Bus Rapid Transit (BRT), the Trolley, rail lines, streets, bicycle travel, pedestrian traffic, and goods movement. The RTP contains public policies, strategies, and investments to maintain, manage, and improve the transportation system in the San Diego region. SANDAG Directors approved the 2030 Regional Transportation Plan on March 28, 2003. The 2030 RTP provides the planning foundation for transportation improvements over nearly 30 years in the future, with periodic updates. A technical update was adopted in February 2006, and a Comprehensive 2007 RTP update is currently underway. It is anticipated that the SANDAG Board will adopt the comprehensive update in November 2007.

Natural Habitat Planning and Open Space Conservation Programs

Regional Natural Community Conservation Planning (NCCP) – Jurisdictions within San Diego County have developed several multiple jurisdiction natural habitat planning and open space conservation programs in accordance with the California Department of Fish and Game (CDFG) Natural Community Conservation Planning (NCCP) program. The NCCP program, enacted in 1991, was established to provide long-term, regional protection of native vegetation and wildlife diversity while allowing compatible land uses and appropriate development and growth. The NCCP process was initiated to provide an alternative to "single-species" conservation efforts that were relied on prior to the NCCP Act. The shift in focus from single-species, project-by-project conservation efforts to conservation planning at the natural community level was intended to

facilitate regional protection of a range of species that inhabit a designated natural community. In terms of regional land use implications, these natural habitat planning and open space conservation programs delineate areas of biological value to the region and implement preservation strategies through public acquisition and/or development regulations. The Multiple Habitat Conservation Program (MHCP), approved in March 2003, was coordinated by the SANDAG and includes the cities of Carlsbad, Oceanside, Vista, Encinitas, Solana Beach, San Marcos and Escondido. The county of San Diego is also conducting planning efforts for the North County and East County MSCP Plans. The cities of Poway, La Mesa and El Cajon have also participated in the NCCP program. The NCCP efforts within San Diego County are illustrated on **Figure 3.8-5**. These habitat preserve planning efforts are discussed further below.

Multiple Species Conservation Program (MSCP) – The MSCP is a comprehensive habitat conservation planning program for 582,243 acres in southwestern San Diego County. The MSCP will preserve a network of habitat and open space to protect biodiversity and enhance the region’s quality of life. The MSCP will also provide an economic benefit by reducing constraints on future development and decreasing the costs of compliance with federal and state natural resource laws. The City of San Diego is one of 11 jurisdictions within the MSCP study area. The City has adopted a subarea plan and implementing agreement with the United States Fish and Wildlife Service (USFWS) and CDFG.

The adoption of the MSCP by the City of San Diego in March 1996 satisfied the mitigation requirement of the City’s Clean Water Program (adopted in 1991). The preparation of the MSCP was a joint effort of the City of San Diego, member agencies, state and federal wildlife agencies, and citizen groups. The program addressed the wastewater facilities needs and improvements for the service area of the Metropolitan Sewerage System that included the City of San Diego as well as adjoining jurisdictions. The biological resource mitigation resulted from the provision of wastewater treatment capacity to accommodate current and projected growth in the southwestern portion of San Diego County. The City of San Diego implemented the MSCP, prepared a MSCP Subarea Plan and established the MHPA as a planned habitat preserve for sensitive biological resources. The MHPA is currently being assembled through the preservation of public lands, public acquisition of private lands from willing sellers, and mitigation for development projects. Other participating jurisdictions and special districts prepared separate subarea plans for their portion of the planned habitat preserve based on biological, economic, ownership and land use criteria (City of San Diego 1996). The status of the subarea plans and assembly of the preserve for each of the jurisdictions are described below.

City of San Diego MSCP/MHPA – The City of San Diego MSCP Subarea Plan (City of San Diego 1997) has been prepared pursuant to the overall MSCP guidelines to address habitat conservation goals within the City boundaries. The City MHPA delineates 52,727 acres of core biological resource areas and corridors targeted for conservation. The City MSCP Subarea Plan also includes a Framework Management Plan and Specific Management Policies and Directives for management of resources within the MHPA.

In accordance with the approved MSCP implementing agreement between the participating jurisdictions and the wildlife agencies, UWFWS and CDFG, each jurisdiction must provide annual reporting on the status of the planned habitat preserve assembly. As of June, 2006, the

City of San Diego had conserved a total of 33,113 acres (or 62.8 percent) of the planned 52,727-acre goal. Approximately 15,341 acres of the remaining 19,614 acres are obligated as open space in association with public open space referred to as “cornerstone lands” and open space approved as a part of approved private projects that has not yet been placed in a conservation easement or dedicated to the City. The remaining 4,273 acres (8 percent) of open space required to assemble the preserve will be acquired through future private conservation and public acquisition of open space. Within the City of San Diego, preservation efforts are focused on assembling the regional preserve, or MHPA, which includes large, contiguous, biologically significant areas and associated corridors. These areas are found throughout the City, with large, core areas near the northern, eastern and southern jurisdictional boundaries; however, the MHPA also includes north-south and east-west corridors in the heart of the City (e.g., San Diego River) as well as urban canyons and parks. Plans for acquisition of the approximately 4,273 acres of privately-owned open space were prioritized by the City Council in April 2000, and have resulted in the purchase of over 1,625 acres in areas such as Montana Mirador, Del Mar Mesa, East Elliott and Otay Mesa. The preserve for the City of San Diego's MSCP Subarea Plan was developed simultaneously with preserves for other MSCP Subareas to create a regional system of core biological resource areas and corridor linkages.

County of San Diego MSCP

The county of San Diego MSCP Subarea Plan covers approximately 242,379 acres. The Subarea is divided into three segments: 1) the Lake Hodges Segment in the northern portion of the county; 2) the Metro-Lakeside Jamul segment that covers 56,949 acres in the eastern portion of the county and; 3) the South County Segment. As of January 2006, a total of 76,747.8 acres have been preserved and 8,323 impacted through development within the county of San Diego portion of the MSCP. The preservation of 76,747.8 acres represents approximately 78 percent of the 98,379-acre goal within the county Subarea.

City of Chula Vista MSCP

The city of Chula Vista Subarea Plan consists of 33,365 acres. The city of Chula Vista Subarea Plan was approved by the Chula Vista City Council in May 2003, and was approved by the UFWFS and CDFG in January 2005. Chula Vista's annual report of habitat gains and losses state that 90.7 acres were impacted and a cumulative total of 2,658.3 acres, approximately 8 percent, have been preserved as permanent open space.

Other MSCP Jurisdictions

For the remaining jurisdictions participating in the MSCP, subarea plans are in draft form and have not yet been approved by the USFWS and CDFG. The cities of Del Mar and Coronado have prepared draft Subarea Plans. The city of Coronado MSCP subarea plan addresses coastal biological communities along the Silver Strand. The primary concern addressed by the Del Mar MSCP Subarea Plan is the southern portion of the San Dieguito Lagoon.

The city of Santee has revised its draft MSCP Subarea Plan to address comments by the USFWS and the CDFG, and is currently proposing to encompass approximately 10,000 acres, of which 57 percent is developed and 43 percent is undeveloped. A previous draft of the plan sought to conserve approximately 2,300 acres.

3.8.2 Thresholds of Significance

A significant impact could occur if implementation of the General Plan:

- Conflicts with any adopted environmental plans, including applicable habitat conservation plans;
- Conflicts with the environmental goals of adopted community plans, land use designations or any other applicable land use plans, policies or regulations of state or federal agencies with jurisdiction over the City;
- Results in land uses that are not compatible with any applicable Airport Land Use Compatibility Plans;
- Physically divides an established community; or
- Creates substantial incompatibilities between adjacent land uses.

3.8.3 Impact Analysis

Could implementation of the proposed General Plan conflict with any adopted environmental plans, including applicable habitat conservation plans?

The Draft General Plan calls for future growth to be focused into mixed-use activity centers that are linked to the regional transit system. Implementation of the Plan would result in infill and redevelopment occurring in selected built areas, which would be identified through the community plan update/amendment process. The Draft General Plan would also guide the development of remaining developable vacant land.

The goal of the MSCP is to achieve a sustainable balance between species preservation and smart growth by identifying areas for habitat/species protection (lands within the MHPA) and areas for development (lands outside the MHPA). The City's MSCP designates areas suitable for development and areas proposed for conservation (MHPA). A key aspect of the Draft General Plan village location criteria is avoiding adjacency concerns with the MHPA. However, in the event that future growth is proposed within the MHPA, the MSCP Plan contains a provision that requires additional lands be added to the MHPA that have an equal or better biological value than those lands removed for development. Any modification to the adopted

subarea plan would be subject to oversight by the United States Fish and Wildlife Service (USFWS), and California Department of Fish and Game (CDFG), and would require environmental review and public comment pursuant to the California Environmental Quality Act (CEQA).

The Draft General Plan is also consistent with the MHPA Land Use Adjacency Guidelines relating to drainage, toxics, lighting, noise, barriers, invasives and brush management, as identified in the MSCP Subarea Plan.

Additionally, the Draft General Plan contains the following policies to guide the conservation of habitat, wildlife, natural open space, and natural drainage resources in a manner consistent with existing environmental plans.

1. Utilize Environmental Growth Funds to Pursue funding for the acquisition and management of the MHPA and other important community open space lands.
2. Support the preservation of rural lands and open spaces throughout the region.
3. Protect community urban canyons and other important open spaces that have been designated in community plans for the many conservation benefits they offer locally and regionally as part of a collective citywide open space system.
4. Minimize or avoid impact to canyons and other environmentally sensitive lands by relocating sewer infrastructure out of these areas where possible, minimizing construction of new sewer access roads into these areas, and redirection of sewers away from canyons and other environmentally sensitive lands.
5. Encourage the removal of invasive plant species and the planting of native plants near open space preserves.
6. Pursue formal dedication of existing and future open space areas throughout the City especially in core biological resource areas of the City's adopted MSCP Subarea Plan.
7. Require sensitive design, construction, relocation, and maintenance of trails to optimize public access and resource conservation.
8. 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.
9. Manage watersheds and regulate floodplains to reduce disruption of natural systems, including the flow of sand to the beaches.
10. Limit grading and alterations of steep hillsides, cliffs and shoreline to minimize erosion and landform impacts.
11. Limit and control runoff, sedimentation, and erosion both during and after construction activity

The proposed policies outlined above would be consistent with the overarching MSCP goal to maintain and enhance biological diversity in the region and conserve viable populations of endangered, threatened, and key sensitive species and their habitats, while enabling economic growth in the region.

Because the Draft General Plan contains extensive policies protecting natural resources and existing provisions in the MSCP require that any modifications to the plan result in equal or

better biological values, the Draft General Plan is not anticipated to result in any significant direct or indirect impacts on environmental or habitat conservation plans. Therefore, no significant impacts associated with this issue are expected to occur.

Could implementation of the proposed General Plan conflict with the environmental goals of adopted community plans, land use designations or any other applicable land use plans, policies or regulations of state or federal agencies with jurisdiction over the City?

The Draft General Plan provides a citywide growth strategy and guidance for future development in the City of San Diego. With limited developable vacant land, the draft General Plan focuses future growth into mixed-use activity centers that are linked to the regional transit system. Implementation of the draft General Plan would result in infill and redevelopment occurring in selected built areas (areas would be identified through the community plan update/amendment process). The draft General Plan would also guide the development of remaining developable vacant land.

In addition to the policies of the Draft General Plan, the City of San Diego also has many programs, permit processes, and regulations in place to guide development, as described in **Section 3.8.1**, Regulatory Framework.

An inconsistency with an adopted plan is not by itself a significant impact. The inconsistency must relate to a physical environmental impact to be considered significant under CEQA. Although no specific projects or actions have been identified with the Draft General Plan that would result in any direct or indirect physical change in the environment, future actions and developments are anticipated that could result in conflicts with other adopted plans in the following areas:

- **Environmental Policies** - Community plans have a broad range of environmental policies that address or emphasize environmental goals to varying degrees, depending on the community's natural setting and resources, the legislative framework that was in place at the time of plan preparation, and the need to address community-specific issues. The General Plan addresses topics that are covered in many community plans including: open space and landform preservation, coastal resources, water resources, urban runoff, air quality, biological diversity, wetlands, energy independence, urban forestry, mineral production, agricultural resources, and environmental education. The General Plan contains the most comprehensive and up-to-date environmental policies of the City of San Diego and in most cases would be consistent with, and enhance community environmental goals. In addition, some community plans contain detailed site-specific guidelines to protect community environmental resources. However, in other communities, community plan amendments/updates will be needed to address current environmental issues and refine and apply broad citywide environmental goals.
- **Land Use Designations** - The Draft General Plan incorporates the adopted Strategic Framework Element and the City of Villages growth strategy into the Land Use and Community Planning Element. Implementation of the General Plan would require that some of the community plans within the City be amended to identify future areas suitable for village development. In addition, community plans would provide site specific

recommendations on how or where to implement citywide policies. Examples of Draft General Plan policies to be refined at the community level include: provision of housing at various densities, location of open space areas, local street system connectivity, location of public facilities and parks, location of public spaces, and street tree master plans, among others.

Some community plans already identify areas suitable for compact, walkable, transit-oriented, or pedestrian-oriented development. For example, the Mid-City Communities, Uptown, and Greater North Park community plans encourage intensification along transit corridors and nodes, the Mission Valley Community Plan calls for a series of mixed-use activity centers linked by the trolley line, and the Pacific Beach Community Plan calls out Transit-Oriented Development Opportunity Areas. Because other community plans do not address or encourage mixed use development, the community plans would need to be amended to effectively implement the proposed General Plan.

- Coastal Zone - Community plans and implementing zones are also the vehicles used by the City to meet state Coastal Act requirements. Since implementation of the General Plan may require community plan amendments as stated above, and some of the City's community planning areas are wholly or partially within the Coastal Zone, there is also a potential need for future amendments to the City's Local Coastal Program (LCP) land use plan. While the draft General Plan policies are consistent with the Coastal Act policies and do not require amendments to the City's LCP land use plan at this time, there is a potential that future actions could result in the need for LCP amendments.
- Other Agencies - With respect to other agencies/jurisdictions that have land use authority on lands adjacent to City of San Diego boundaries, implementation of the Draft General Plan will not result in substantial conflict with the general/master plans of those agencies, since the General Plan is intended to guide development only within the City of San Diego. Jurisdictions located adjacent to areas where land use plan updates and amendments occur are included in the plan update review process and allowed to comment on the proposed land use plans including land use designations and circulation patterns.

The Draft General Plan and the implementation of existing regulations and programs would help to avoid and mitigate these potential impacts. For example, the City's Environmentally Sensitive Lands (ESL) regulations are designed to help assure that development occurs in a manner that protects the overall quality of the resources, encourages a sensitive form of development, retains biodiversity and interconnected habitats, maximizes physical and visual public access to and along the shoreline, and reduces hazards due to flooding. Coastal Development Permits and Site Development Permits address additional policy and regulatory objectives pertaining to plan consistency and resource protection. In general, the development process helps minimize potential conflicts between environmental and land use goals that could occur at the site-specific project level by providing a means for addressing and correcting conflicts. In addition, the City of San Diego has a process for community plan amendments. In order to amend a community plan, a finding must be made that it is consistent with the goals and policies of the City's adopted General Plan.

To implement the General Plan, amendments and updates to community plans are needed. To help ensure that the City's community plans are consistent with the General Plan, and that they serve as an effective means to implement citywide environmental policies a Community Plans update program is being established. Likewise, as community plans are updated it is anticipated that the process will apply Land Development Code regulations to achieve the desired community plan land use, design, and public benefits.

Until those updates occur, there may be conflicts with respect to the extent to which General Plan policies are implemented. However, discretionary review of public and private projects will evaluate whether proposed projects implement specified land use, density/intensity, design guidelines, Airport/Land Use Compatibility Plans, and other General Plan and community plan policies including open space preservation, community identity, mobility, and the timing, phasing, and provision of public facilities and ensure that they do not adversely affect the General Plan and community plans. The General Plan provides the framework to guide community plan amendments, updates and projects under discretionary review. The adopted community plans have been and will remain the authority for land use, density and site specific recommendations. Where community plans are silent on policy issues, the General Plan policies will apply. There may be a situation where a community plan does not implement the General Plan to the maximum extent possible, however, it is anticipated that competing goals and policies can be resolved through discretionary review. According to the State of California 2003 General Plan Guidelines a general rule for determining whether "an action, program, or project is consistent with the general plan [is] if, considering all its aspects, it will further the objectives and policies of the general plan and not obstruct their attainment." The discretionary review process allows staff and decision makers to balance competing goals and policies within adopted plans to achieve the overall policy objectives and make the permit findings for consistency with the general plan. Review of development will also be subject to Environmentally Sensitive Lands regulations which are applied through the permit review process to reduce construction impacts on sensitive lands.

Implementation of the above mentioned Draft General Plan policies, future community plan updates and future compliance with established development standards would serve to reduce impacts to a degree, but cannot guarantee that all future project level impacts will be avoided or mitigated to a level less than significant. Because the extent of these plan amendments, development regulations, and future development projects are unknown at this time, the degree of impact and applicability, feasibility, and success of these measures can not be accurately predicted for each specific project at this time. Therefore, the program level environmental impacts related to General Plan conflicts with other adopted plans are considered significant and unavoidable.

Could implementation of the proposed General Plan result in land uses that are not compatible with any applicable Airport Land Use Compatibility Plans?

For the General Plan to be considered consistent with an Airport Land Use Compatibility Plan, it must do both of the following: 1) it must not have any direct conflicts with the Compatibility Plan; and, 2) it must contain criteria and/or provisions for evaluation of proposed land use development situated within the boundaries of the Compatibility Plan. Direct conflicts occur

with respect to General Plan land use designations, intensities or densities, which the ALUC has determined incompatible in proximity to an airport. If conflicts exist, the elimination of these conflicts may require reducing or shifting allowable residential densities or non-residential intensities to different locations around the airport or other areas of the City to ensure consistency with the Compatibility Plan policies and criteria. Only future proposed land uses are affected; the ALUC has no authority over existing land uses even if those uses do not conform to the adopted compatibility policies and criteria. The second requirement addresses criteria for evaluating other compatibility factors such as noise insulation, notification, and aviation easement requirements.

The policies and criteria in the General Plan are consistent with the adopted Airport Land Use Compatibility Plans that affect land use within the City. In addressing the first criteria, the Draft General Plan does not involve modifications to land use designations, intensities or densities. The community plans, precise plans, and specific plans contain the adopted land use designations and residential densities for the City and do not contain any direct land use conflict for future uses with the adopted Airport Land Use Compatibility Plans. The Draft General Plan contains policy language supporting the compatibility between land use plans and the ALUCPs. However, future developments projects could be submitted to the City that may require amendments to the community plans. Amendments to the community plans could result in potential incompatibilities with an Airport Land Use Compatibility Plan. The City will submit the Draft General Plan, prior to adoption, to the ALUC for a consistency determination as required by state law. If upon the ALUC review, it determines that inconsistency does exist, the City will take the appropriate steps to address the inconsistencies or overrule the ALUC determination. The above process is intended to address inconsistencies in plans prior to adoption. However, there is a mechanism for the City to adopt plans that are inconsistent with Compatibility Plans. Under state law, the City Council may overrule the ALUC determination by a two-thirds vote if it makes specific findings that the proposed action is consistent with the purposes of protecting public health, safety, and welfare, minimizing the public's exposure to excessive noise, and minimizing safety hazards within areas surrounding the airport.

An inconsistency with a plan is not by itself a significant impact. The inconsistency must relate to a physical impact on the environment considered significant under CEQA. If it becomes necessary to adopt a plan that is inconsistent and overrule the ALUC determination and the inconsistency results in physical impacts, there may be significant and unavoidable impacts associated with this inconsistency.

Since no specific development project is proposed at this time, no project-level mitigation can be developed at this time to address potential environmental impacts. Future environmental analysis would be required for any such future action or project; identification of project-specific level mitigation measures would be determined at that time. Because the degree of impact and applicability, feasibility, and success of these measures can not be accurately predicted for each specific project at this time, the program level impact related to General Plan conflicts with Airport Land Use Compatibility Plans are considered significant and unavoidable.

In addressing the second criteria, the Draft General Plan does contain policies for evaluating airport land use compatibility. For example, the Noise Element contains land use-noise compatibility guidelines and related policies for noise insulation and the Land Use Element contains policies addressing structure heights for uses in areas where proposed development could be an airspace obstruction or hazard and aviation easements. Discretionary review of public and private projects will evaluate whether proposed projects implement specified land use, density/intensity, design guidelines, Airport Land Use Compatibility Plans, and other General Plan and community plan policies to ensure that they do not adversely affect the General Plan and community plans.

The City implements the adopted ALUCPs with the Airport Environs Overlay Zone (AEOZ). The AEOZ boundaries cover less area than the boundaries of the airport influence area, which could allow the development of future projects that could pose a potentially significant impact outside of the AEOZ boundaries, but within the airport influence area. As a mitigation measure, the City will continue to submit discretionary projects within the airport influence area for each airport in the City with an adopted ALUCP to the ALUC for consistency determinations up until the time when the ALUC adopts the updated ALUCPs and subsequently determines that the City's affected land use plans, development regulations, and zoning ordinances are consistent with the ALUCPs.

Implementation of the above mentioned Draft General Plan policies and compliance with established development standards would serve to reduce impacts to a degree, but cannot guarantee that all future project level impacts will be avoided or mitigated to a level less than significant. Since no specific development project is proposed at this time, no project-level mitigation can be developed at this time to address potential environmental impacts. Environmental analysis would be required for any such future action or project; identification of project-specific level mitigation measures would be determined at that time. Because the degree of impact and applicability, feasibility, and success of these measures can not be accurately predicted for each specific project at this time, the program level impact related to General Plan conflicts with Airport Land Use Compatibility Plans are considered significant and unavoidable.

Could implementation of the proposed General Plan physically divide an established community?

As stated above, the Draft General Plan focuses future growth into mixed-use activity centers that are linked to the regional transit system. As this growth occurs, future infrastructure and development projects will be evaluated based on their conformance with the updated General Plan and the appropriate community plan. The draft General Plan contains policies that emphasize increasing connectivity between and within communities that may reduce impacts that could physically divide established communities. There have been instances in the City's past where major road or freeway construction has physically divided established communities. The Draft General Plan has policies calling for the sensitive design of roads and the development of a multimodal transportation system that may minimize the need for new or wider roads that could potential divide established communities. Examples of relevant policies include:

- Design an interconnected street network within and between communities, which includes pedestrian and bicycle access, while minimizing landform and community character impacts.
- Where possible, design or redesign the street network, so that wide arterial streets do not form barriers to pedestrian traffic and community cohesiveness.
- Locate and design new streets and freeways and, to the extent practicable, improve existing facilities to respect the natural environment, scenic character, and community character of the area traversed; and meet safety standards.
- Use open space and landscape to define and link communities.
- Link villages, public attractions, canyons, open space, and other destinations together by connecting them with trail systems, bikeways, landscaped boulevards, formalized parks, and/or natural open space, as appropriate.
- Preserve and encourage preservation of physical connectivity and access to open space.
- Design or retrofit street systems to achieve high levels of connectivity within the neighborhood street network that link individual subdivisions/projects to each other and the community.
- Design or retrofit streets to improve walkability, strengthen connectivity, and enhance community identity.

In addition to Draft General Plan policies, the City of San Diego's Street Design Manual (2002) contains guidelines for the physical design of streets that consider community character and the needs of all users of the public right-of-way. The manual includes provisions for street trees, traffic calming and pedestrian design guidelines, and addresses how to create streets that are important public places. The Street Design Manual guidelines apply to newly developing areas and as appropriate to older areas undergoing redevelopment construction and whenever improvements are made to existing facilities.

While the policies and guidelines described above are designed to minimize future impacts to community cohesiveness, private development projects, as well as public facilities (i.e., roads, transit lines, utilities), that may occur subsequent to General Plan adoption may have impacts that are unknown at this time. As part of the community plan update process the transportation network will be studied to plan and create a balanced network. Implementation of the above mentioned Draft General Plan policies, the community plan update process and compliance with established development standards would serve to reduce impacts to a degree, but cannot guarantee that all future project level impacts will be avoided or mitigated to a level less than significant. Because the degree of impact and applicability, feasibility, and success of these measures can not be accurately predicted for each specific project at this time, the program level impacts related to physically dividing communities are considered significant and unavoidable.

Could implementation of the proposed General Plan create substantial incompatibilities between adjacent land uses?

As the majority of the City is developed, infill development and redevelopment will play an increasingly significant role in providing needed housing, jobs, and services. Guidance for how this development should occur is provided by the City of Villages strategy to focus growth into mixed use activity centers, and through additional policies that address land use compatibility

and urban design. The Draft General Plan supports a greater mixing of land uses as a way to reduce commute distances and to make it possible for people to access a wide variety of goods and services on foot. However, while a greater mixing of land uses may have environmental benefits related to air quality, traffic, and the provision of public facilities (see **EIR Sections 3.2 Air Quality, 3.15 Transportation and 3.13 Public Services and Facilities**), mixed-use projects may also result in environmental impacts related to noise, lighting, and odors due to mixed-use projects such as residential/night club/restaurant; noise and air quality impacts due to residential proximity to transit corridors and streets; and possible noise, facilities, and public health impacts due to the mixing of employment/industrial/residential uses.

Draft General Plan policies designed to minimize the potential for land use incompatibilities generally relate to mixed use village development, residential/industrial land use issues, and agriculture/mining adjacency issues. The following policies address potential land use incompatibility impacts to a degree. However, since no specific development project is proposed at this time, no project-level mitigation can be developed at this time to address potential environmental impacts.

Mixed-Use Village Development

Draft General Plan policies related to commercial and commercial/mixed-use village development include:

- Identify sites suitable for mixed-use village development that will complement the existing community fabric or help achieve desired community character, with input from recognized community planning groups and the public-at-large;
- Recognize that various villages may serve specific functions in the community and City; some villages may have an employment orientation, while others may be major shopping destinations, or primarily residential in nature;
- Determine at the community plan level where commercial uses should be intensified within villages and other areas served by transit, and where commercial uses should be limited or converted to other uses;
- Plan for and develop mixed-use projects where a site or sites are developed in an integrated, compatible, and comprehensively planned manner involving two or more land uses, and,
- Provide standards that address the particular design issues related to mixed-use projects, such as parking, noise attenuation and security measures.

Industrial/Residential Land Use

The Draft General Plan Economic Prosperity Element calls for the preservation of prime industrial lands for base sector employment uses, while encouraging a greater mix of employment/residential uses in village centers and certain types of employment center areas not characterized by base sector uses. Base-sector industries are defined as industrial uses which drive economic prosperity by importing wealth to the local or regional economy through the production of goods and the development of intellectual products and processes which are exported to national or international markets. Collocation occurs when there is the geographic

integration of residential development into industrial uses, or when residential is proposed adjacent to industrial uses. The Draft General Plan proposes a collocation policy that would limit collocation in an effort to maintain and protect lands for base-sector industrial uses.

According to SANDAG, the ~~City of San Diego~~ region has adequate long term supply of employment land, but the City of San Diego ~~region~~ does not. The Draft General Plan has goals and policies designed to protect and preserve the City's supply of land available to base-sector industrial uses. The Draft General Plan identifies prime industrial lands as areas that support base sector activities, such as warehouse distribution, heavy or light manufacturing, and research and development uses. Identification of prime industrial lands is based on a combination of six characteristics: it is designated industrial in the community plan, it has restrictive industrial zoning, it is feasible for industrial use from a market perspective, it is predominately developed with industrial structures, it is free from non-industrial encroachment, and it is in proximity to resources of extraordinary value. The Draft General Plan identifies these areas as a part of even larger areas that provide a significant benefit to the regional economy, and meet General Plan goals and objectives to encourage a strong economic base. The identification of prime industrial land does not affect existing land use designations or zoning.

The policies in the Draft General Plan direct that a number of factors be considered in a community plan amendment request that proposes land use changes from industrial to residential or commercial uses. Currently, a project involving a residential use in an industrial designation, must consider whether the project would have "no adverse impacts" to the General Plan. The policies in the Draft General Plan would additionally require that the community/general plan amendment analyze the regional significance of the parcel in question, and that the ability to process certain discretionary permits (such as Conditional Use Permits, for public assembly and sensitive receptor uses in industrial designations) be limited.

The Conversion/Collocation Suitability Factors (Appendix C of the Draft General Plan) address where residential and employment uses may be appropriately mixed. These factors include area character, transit availability, impacts on prime industrial, significant residential components, residential support facilities, airport land use compatibility, public health, public facilities and adequate separation of uses which includes a maximum 1,000-foot distance separation between industrial and residential properties or other sensitive receptor land uses with regard to hazardous or toxic air contaminants or hazardous or toxic substances. Sensitive receptors are described in the Draft General Plan as "land uses including residential, schools, child care centers, acute care hospitals, and long term care facilities." These factors are to be used during discretionary project review, plan amendments and plan updates. Conversion/Collocation Suitability Factors would not be reviewed at the ministerial level since sensitive receptor uses locating in industrial areas require a higher level of review. Uses which are not sensitive receptor land uses, such as most commercial and business offices, retail uses, parking, open space, and public rights-of-way can locate between the properties within the separation area.

For non-industrial properties to be redesignated for industrial uses, the Draft General Plan calls for the City to evaluate the extent to which the proposed designation and subsequent industrial development would: accommodate the expansion of existing industrial uses to facilitate their retention in the area in which they are located; not intrude into existing residential neighborhoods

or disrupt existing commercial activities and other uses; mitigate any environmental impacts (traffic, noise, lighting, air pollution, and odor) to adjacent land; and be adequately served by existing and planned infrastructure. The menu of community plan land use designations also specifies a new designation, Business Park/Residential. While many non-conforming residential uses are located in industrially-designated areas, this designation would allow collocating these uses subject to use regulations and development standards in the implementing zone. As part of community plan updates, implementation of new base zone use packages or modification to existing zones, designed to provide new mixed-use zone categories will also address issues to avoid incompatible permitted uses within Industrial and Commercial zones. Existing and future regulations will also provide development standards aimed at reducing land use incompatibilities. As part of the community plan updated process, opportunities for employment uses, as well as areas appropriate for locating workforce-housing opportunities near job centers will be identified. Collocation/Conversion Suitability Factors will be used to analyze compatibility of site specific proposals.

Agricultural and Mining Lands

The Draft General Plan includes policies designed to minimize conflicts between uses, and to avoid impacts to agricultural and mining lands. The draft General Plan provides policy direction for agricultural or mining lands. Because the draft General Plan directs growth into urbanized areas that are already identified as suitable for urban development, conflicts with agricultural or mining lands are not anticipated. Relevant policies in the Conservation Element include: limit retail activity in agriculturally-designated areas to uses that are reasonably related to agriculture (e.g., sale of locally grown farm products); permit new or expanding mining operations within the MHPA in accordance with MSCP policies and guidelines; and produce sand and gravel with minimal harm and disturbance to adjacent property and communities.

While the Draft General Plan provides policies that emphasize compatibility between uses, it relies on community plan updates and future public and private development projects to implement its policies. Private development projects as well as public facilities that occur subsequent to General Plan adoption may have impacts that are unknown at this time. Environmental analysis would be required for any such future action or project; identification of project-specific level mitigation measures would be determined at that time. Because the degree of impact and applicability, feasibility, and success of these measures can not be accurately predicted for each specific project at this time, the program level impact related to potential incompatibilities between adjacent land uses is considered significant and unavoidable.

3.8.4 Mitigation Framework

Goals, policies, and recommendations enacted by the City combined with existing regulations described above provide a framework for developing project level protection measures for future discretionary projects which may conflict with adopted plans and environmental policies; or result in incompatibilities between land uses and with applicable Airport Land Use Compatibility Plans; or physically divide established communities. The City's process for evaluation of discretionary projects includes environmental review and documentation pursuant to CEQA as well as an analysis of those projects for consistency with the goals, policies and

recommendations of the General Plan and the applicable Community Plan. In general, implementation of the above policies and compliance with established regulations would avoid or minimize significant impacts. Compliance with regulations is required of all projects and is not considered to be mitigation. However, it is possible that for certain projects, adherence to the regulations may not adequately address incompatibilities with adopted plans and polices and physically divide communities, and such projects would require additional measures to avoid or reduce significant impacts. These additional measures would be considered mitigation.

For each future discretionary project requiring mitigation (i.e., measures that go beyond what is required by existing regulations), site-specific measures will be identified that reduce significant project-level impacts to less than significant or the project level impact may remain significant and unavoidable where no feasible mitigation exists. Where mitigation is determined to be necessary and feasible, these measures will be included in a Mitigation Monitoring and Reporting Program (MMRP) for the project. Mitigation Framework Measures (summarized below) are general measures that may be implemented to preclude impacts and may be updated, expanded and refined when applied to specific future projects based on project-specific design and changes in existing conditions, and local, state and federal laws. The Mitigation Framework includes:

- A Community Plan update program is being established to help ensure that the City's community plans are consistent with the General Plan, and that they serve as an effective means to implement citywide environmental policies and address policies related to Airport Land Use Compatibility Plans. As community plans are updated it is anticipated that the process will apply Land Development Code regulations to achieve the desired community plan land use, design, and public benefits. As part of the community plan update process the transportation network will be studied to plan and create a balanced network. In addition, as part of the community plan update process, opportunities for employment uses, as well as areas appropriate for locating workforce-housing opportunities near job centers will be identified. Collocation/Conversion Suitability Factors will be used to analyze compatibility of site specific proposals.
- Implementation of new base zone use packages, designed to provide new mixed-use zone categories will also address issues to avoid incompatible permitted uses within Industrial and Commercial zones. Existing and future regulations will also provide development standards aimed at reducing land use incompatibilities.
- Future projects will be reviewed for compliance with the General Plan and applicable community plans. Prior to the approval of any entitlement, the City will evaluate whether proposed projects implement specified land use, density/intensity, design guidelines, Airport/Land Use Compatibility Plans, and other General Plan and community plan policies including open space preservation, community identity, mobility, and the timing, phasing, and provision of public facilities.
- Future projects located adjacent to County MSCP lands and County parks and preserves would require coordination with the County of San Diego to ensure adverse impacts to these resources do not occur.

3.8.5 Significance of Impact with Mitigation Framework

Environmental/Habitat Plans

Adoption of the proposed General Plan is not anticipated to have a significant impact on any defined comprehensive resource planning areas because the proposed goals and policies have been established to reduce impacts on sensitive biological resources and to be consistent with the City's MSCP and ESL ordinance. Therefore, the proposed General Plan would not pose a significant impact associated with environmental and habitat conservation plans.

Airport Land Use Compatibility Plans/Physically Divide Communities/Land Use Incompatibilities

The Airport Land Use Commission determination process addresses inconsistencies between the adopted Airport Land Use Compatibility Plans and draft land use plans prior to adoption. However, there is a mechanism for the City to adopt plans that are inconsistent with Compatibility Plans. Under state law, the City Council may overrule the ALUC determination by a two-thirds vote if it makes specific findings that the proposed action is consistent with the purposes of protecting public health, safety, and welfare, minimizing the public's exposure to excessive noise, and minimizing safety hazards within areas surrounding the airport. If it becomes necessary to adopt a plan that is inconsistent and overrule the ALUC, determination there may be significant and unavoidable impacts.

Physical impacts from future development are unknown and future environmental analysis would be required for any discretionary actions needed to implement the draft General Plan. Impacts due to incompatibilities from future development are unknown and future analysis would be required for any discretionary actions needed to implement the draft General Plan. Because the degree of future impacts and applicability, feasibility, and success of future mitigation measures cannot be adequately known for each specific future project at this program level of analysis, the program-level impacts related to conflicts with goals in adopted plans; incompatible land uses; and that may physically divide established communities remains significant and unavoidable.

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Impact Report

The General Plan Land Use Map depicts generalized land use within the City of San Diego. The information is a composite of the land use maps adopted for each of the community, specific, subarea and park plan areas. It is intended as a representation of the distribution of land uses throughout the city; although consistent with, it is not a replacement or substitution for community or other adopted land use plans. Please refer to the relevant community or other adopted land use plan documents for more detail regarding planned land uses and land use planning proposals.

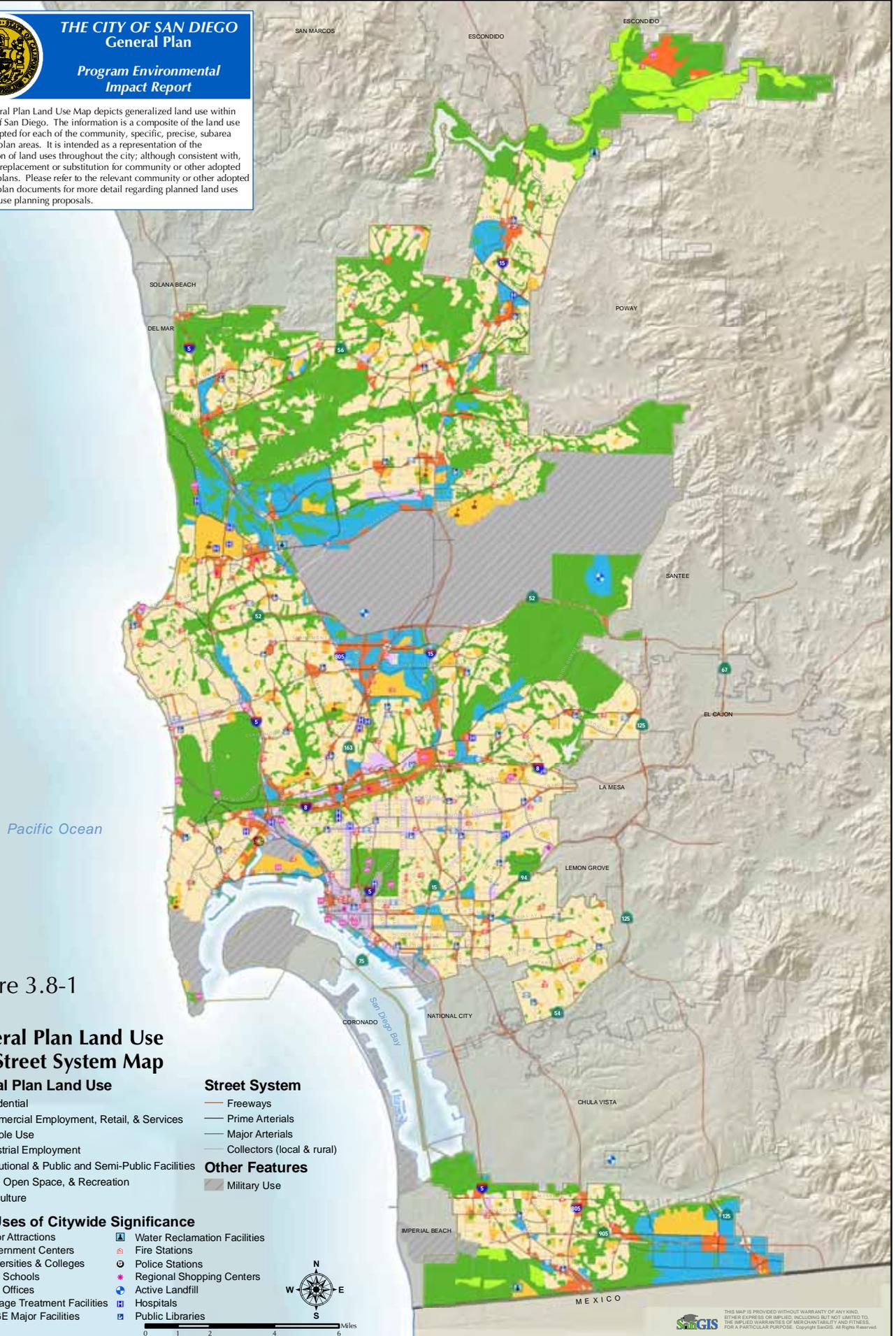


Figure 3.8-1

General Plan Land Use and Street System Map

General Plan Land Use

- Residential
- Commercial Employment, Retail, & Services
- Multiple Use
- Industrial Employment
- Institutional & Public and Semi-Public Facilities
- Park, Open Space, & Recreation
- Agriculture

Street System

- Freeways
- Prime Arterials
- Major Arterials
- Collectors (local & rural)

Other Features

- Military Use

Land Uses of Citywide Significance

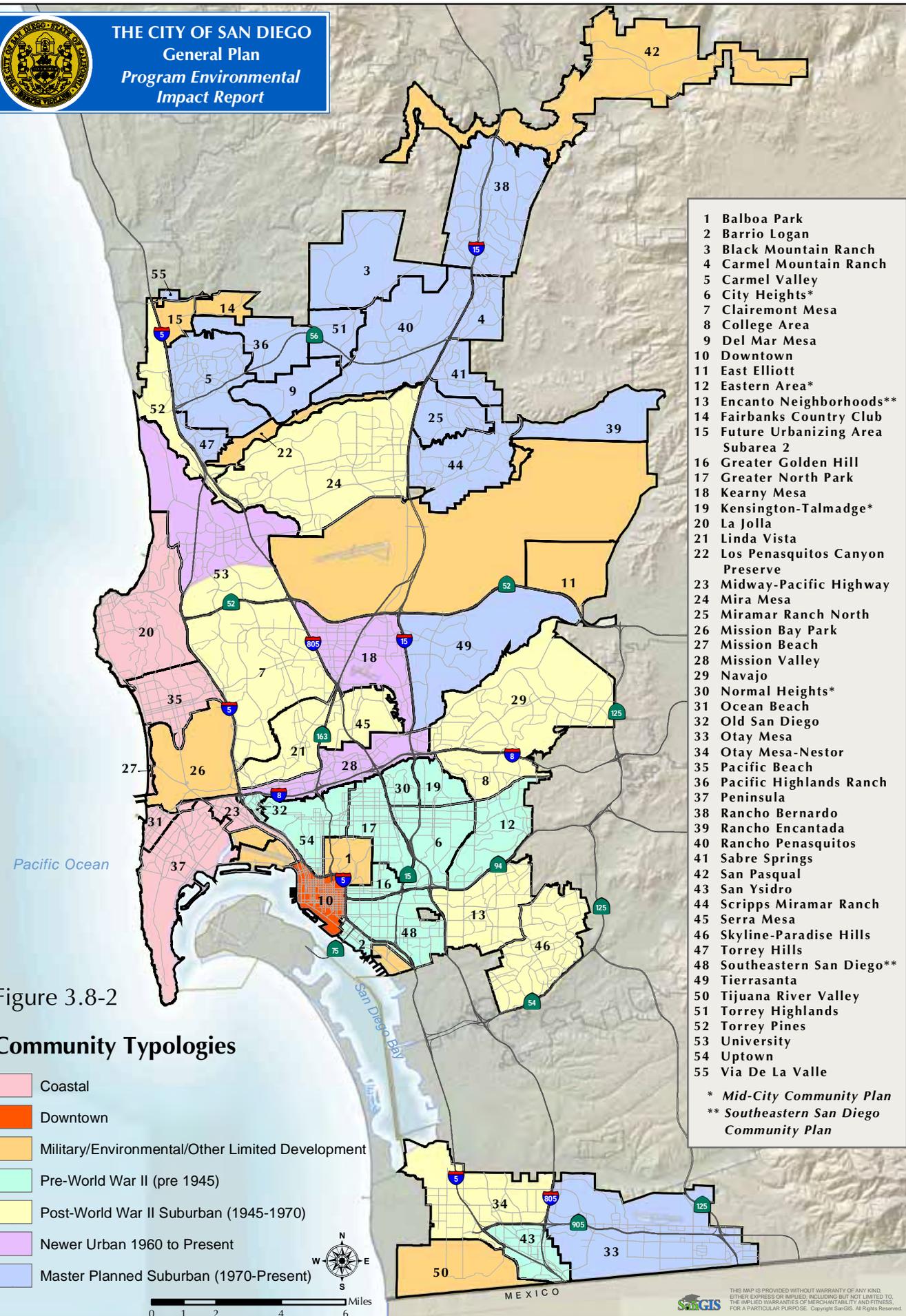
- Major Attractions
- Government Centers
- Universities & Colleges
- High Schools
- Post Offices
- Sewage Treatment Facilities
- SDGE Major Facilities
- Water Reclamation Facilities
- Fire Stations
- Police Stations
- Regional Shopping Centers
- Active Landfill
- Hospitals
- Public Libraries



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 General Plan
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- 1 Balboa Park
 - 2 Barrio Logan
 - 3 Black Mountain Ranch
 - 4 Carmel Mountain Ranch
 - 5 Carmel Valley
 - 6 City Heights*
 - 7 Clairemont Mesa
 - 8 College Area
 - 9 Del Mar Mesa
 - 10 Downtown
 - 11 East Elliott
 - 12 Eastern Area*
 - 13 Encanto Neighborhoods**
 - 14 Fairbanks Country Club
 - 15 Future Urbanizing Area Subarea 2
 - 16 Greater Golden Hill
 - 17 Greater North Park
 - 18 Kearny Mesa
 - 19 Kensington-Talmadge*
 - 20 La Jolla
 - 21 Linda Vista
 - 22 Los Penasquitos Canyon Preserve
 - 23 Midway-Pacific Highway
 - 24 Mira Mesa
 - 25 Miramar Ranch North
 - 26 Mission Bay Park
 - 27 Mission Beach
 - 28 Mission Valley
 - 29 Navajo
 - 30 Normal Heights*
 - 31 Ocean Beach
 - 32 Old San Diego
 - 33 Otay Mesa
 - 34 Otay Mesa-Nestor
 - 35 Pacific Beach
 - 36 Pacific Highlands Ranch
 - 37 Peninsula
 - 38 Rancho Bernardo
 - 39 Rancho Encantada
 - 40 Rancho Penasquitos
 - 41 Sabre Springs
 - 42 San Pasqual
 - 43 San Ysidro
 - 44 Scripps Miramar Ranch
 - 45 Serra Mesa
 - 46 Skyline-Paradise Hills
 - 47 Torrey Hills
 - 48 Southeastern San Diego**
 - 49 Tierrasanta
 - 50 Tijuana River Valley
 - 51 Torrey Highlands
 - 52 Torrey Pines
 - 53 University
 - 54 Uptown
 - 55 Via De La Valle
- * Mid-City Community Plan
 ** Southeastern San Diego Community Plan

Figure 3.8-2

Community Typologies

- Coastal
- Downtown
- Military/Environmental/Other Limited Development
- Pre-World War II (pre 1945)
- Post-World War II Suburban (1945-1970)
- Newer Urban 1960 to Present
- Master Planned Suburban (1970-Present)

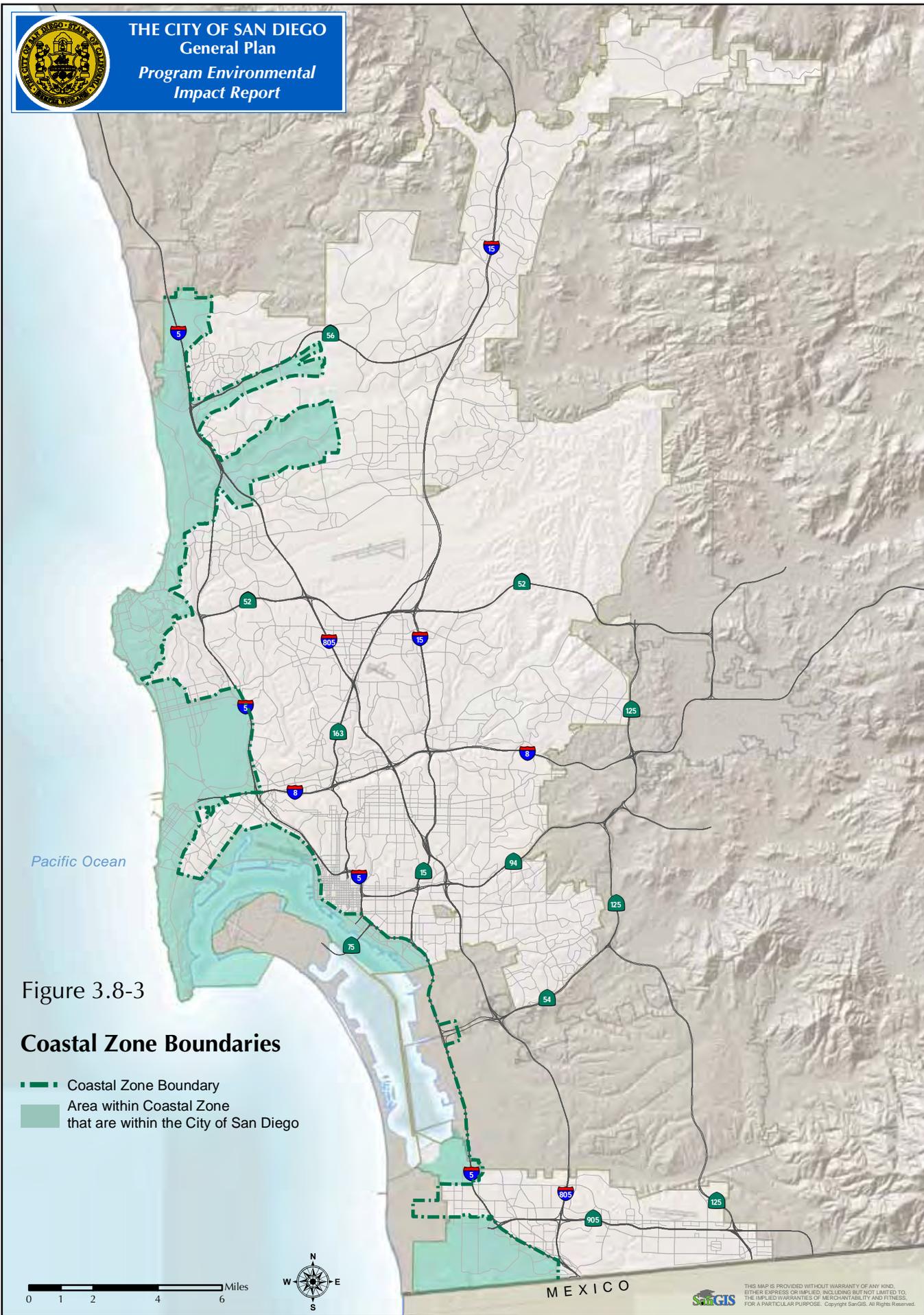
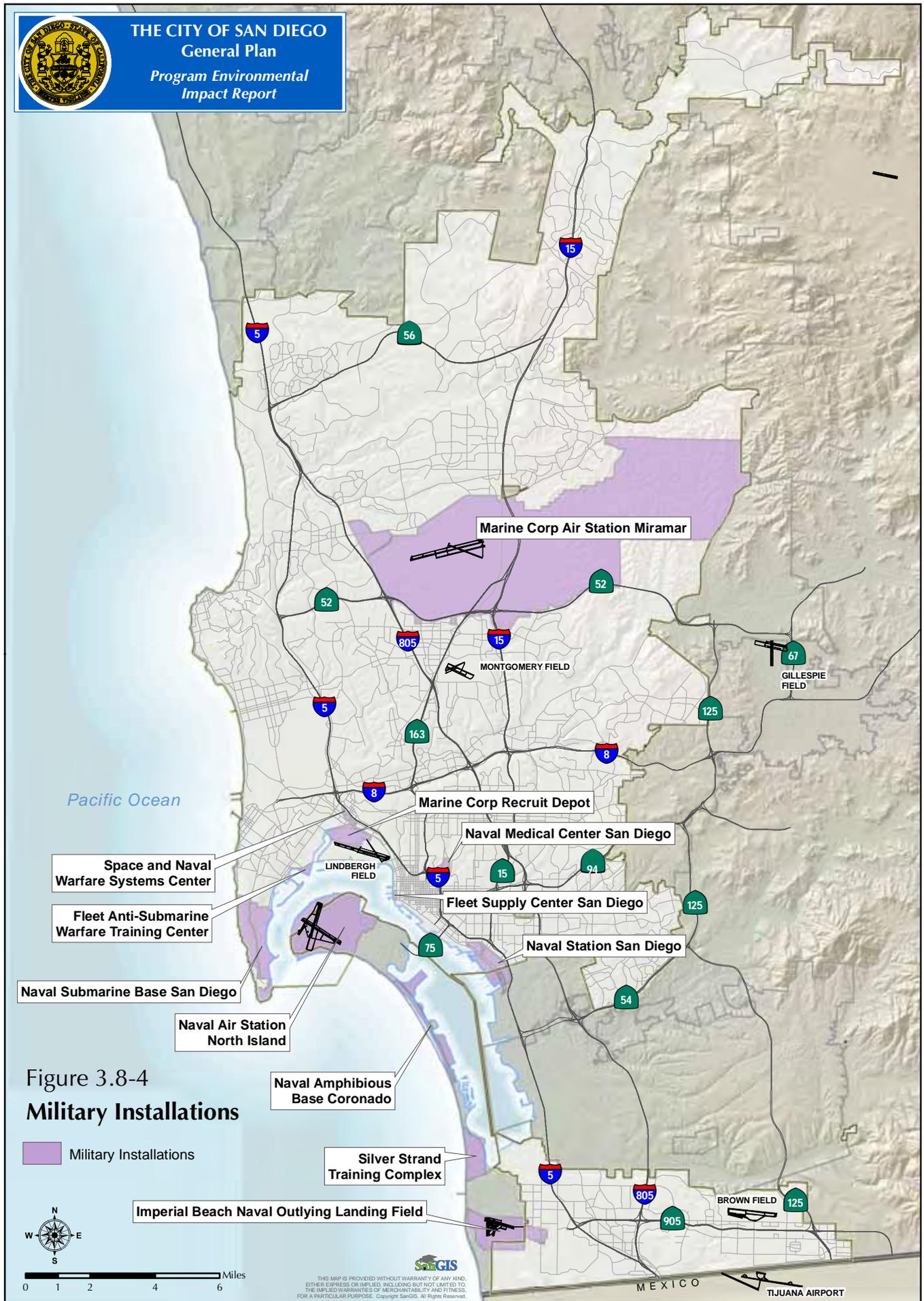


Figure 3.8-3

Coastal Zone Boundaries

- Coastal Zone Boundary
- Area within Coastal Zone that are within the City of San Diego

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THE CITY OF SAN DIEGO General Plan

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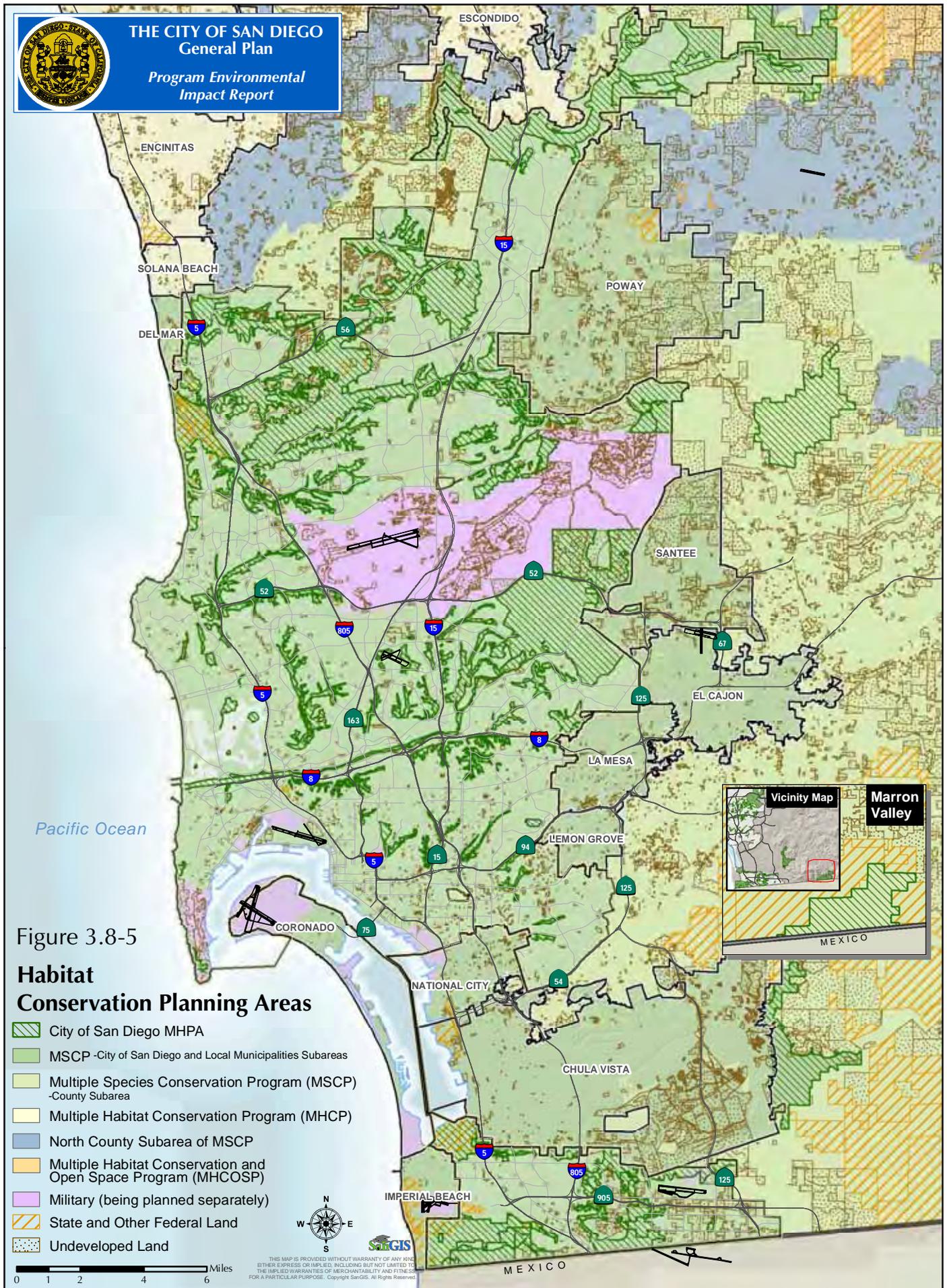


Figure 3.8-5

Habitat Conservation Planning Areas

- City of San Diego MHPA
- MSCP -City of San Diego and Local Municipalities Subareas
- Multiple Species Conservation Program (MSCP) -County Subarea
- Multiple Habitat Conservation Program (MHCP)
- North County Subarea of MSCP
- Multiple Habitat Conservation and Open Space Program (MHCOSP)
- Military (being planned separately)
- State and Other Federal Land
- Undeveloped Land



0 1 2 4 6 Miles

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3.9 MINERAL RESOURCES

3.9.1 Existing Conditions

San Diego's important mineral resources include salt, sand, and gravel, all of which have been produced in San Diego for many decades. San Diego's aggregate mineral resources (sand and gravel) provide necessary materials for the local economy. Extraction of sand, rock, and gravel, began in Mission Valley in 1913. Extraction still occurs in Mission Valley and in other areas of the City such as Carroll Canyon and Mission Gorge. There are also mining operations within the Multiple Species Conservation Program (MSCP) subarea plan, consisting mainly of sand, rock, and gravel extraction using open pit mining.

Due to competing demands for precious open lands, access to aggregate reserves in western San Diego County have significantly decreased over the past 20 years. Urbanization, as well as the designation of lands within the MSCP, and the depletion of active mines, contributes to the shortage of materials. Urban preemption of prime mineral resource deposits and conflicts between mining and other uses throughout California led to passage of the Surface Mining and Reclamation Act of 1975 (SMARA), which requires all cities and counties to incorporate in their General Plans the mapped designations approved by the state Mining and Geology Board. The state geologist classifies mineral lands solely on the basis of geological factors. By statute, existing land use is not considered during categorization. The state Mining and Geology Board has defined Mineral Resource Zones; the zones are established based on the presence or absence of significant sand and gravel deposits and crushed rock resource areas. A description of these zones is provided on **Table 3.9-1**.

Table 3.9-1
Description of Mineral Zones

Zone	Description
MRZ-1	Areas where adequate information indicates that no significant mineral deposits are present, or where it is judged that there is little likelihood for their presence.
MRZ-2	Areas where adequate information indicates that significant mineral deposits are present or where it is judged that there is a high likelihood for their presence.
MRZ-3	Areas containing mineral deposits, the significance of which cannot be evaluated from available data.
MRZ-4	Areas where available information is inadequate for assignment to any other MRZ.

According to Special Report 153, prepared by the Division of Mines and Geology, Portland Cement Concrete aggregate is the scarcest aggregate resource in San Diego County due to the restrictive specifications for that material. Those deposits that meet the specifications for Portland Cement Concrete are therefore of high value and of most concern in planning future

availability. The location of San Diego's high quality mineral resource areas are shown on **Figure 3.9-1** as Mineral Resource Zone (MRZ)-2 areas. These are areas designated for the managed production of mineral resources. State law requires cities to plan for the beneficial management of these valuable mineral resources.

In general the MRZ-2 (**Figure 3.9-1**) areas are concentrated along major drainages such as the Otay River, the Tijuana River, the San Diego River, Carroll Canyon, and the San Dieguito River. Many of the City's existing mining operations are located along rivers and water courses, in areas within the City's Multi-Habitat Planning Area (MHPA). In general, the City's MSCP provides for the continuation of existing mining operations. However, new or expanded mining operations on lands conserved as part of the MHPA are incompatible with MSCP preserve goals for covered species and their habitats, unless otherwise agreed to by the wildlife agencies at the time the parcel is conserved. New operations could be permitted in the MHPA if: 1) impacts have been assessed and conditions incorporated to mitigate biological impacts and restore mined areas; 2) adverse impacts to covered species in the MHPA have been mitigated consistent with the Subarea Plan; and 3) requirements of other City land use policies and regulations have been satisfied. The MSCP requires that existing and new mining operations adjacent to or within the MHPA adequately protect adjacent preserved areas and covered species.

San Diego's salt production occurs within the South San Diego Bay Unit of the San Diego National Wildlife Refuge. Within this refuge, approximately 1,050 acres of salt ponds are currently in active salt production. A commercial solar salt operation is permitted to operate within the refuge. This operation, which occurs on approximately 1,035 acres at the southern most end of San Diego Bay, has produced salt at this site for more than 130 years. The current facility consists of a series of diked ponds that facilitate the concentration and precipitation of salts from bay water. Although the salt ponds are a unique local industry, they do not represent a large share of the salt production market. Most of the salt produced in San Diego is used locally. The salt ponds are also valuable as an irreplaceable habitat for many bird species and provide breeding grounds for numerous mollusks and shellfish. Each year, birds use the ponds to nest, feed, and roost. It is one of the few large areas remaining along the highly urbanized Southern California coast where large bird populations can gather. The U.S. Fish and Wildlife's draft Comprehensive Conservation Plan (CCP) is considering restoring the commercial salt ponds for wildlife. Salt ponds also provide an appropriate use for open space designations in the area.

3.9.2 Thresholds of Significance

A significant impact could occur if implementation of the Draft General Plan:

- Results in the loss of significant mineral resources (e.g. sand and gravel) that could be of value to the region and residents of the state.

3.9.3 Impact Analysis

Could implementation of the Draft General Plan result in the loss of significant mineral resources (e.g. sand and gravel) that could be of value to the region and residents of the state?

Impacts to significant mineral resources occur when access to the resource is restricted or prohibited through development of lands containing the resource or when non-compatible land uses are developed in close proximity thereby reducing the likelihood for extraction of those resources. There are a number of objectionable characteristics that typically accompany the extraction, processing and transportation of sand and gravel products. These include noise, vibration, air pollution, dust, heavy trucks causing traffic congestion, and the often significant visual impacts.

The Draft General Plan includes a number of policies aimed at preserving access to mineral resources, reducing the need for new construction materials, and to accommodate mineral extraction to occur under less objectionable circumstances. These policies are provided below:

1. Promote the recycling and reclamation of construction materials to provide for the City's current and future growth and development needs.
2. Permit new or expanding mining operations within the MHPA in accordance with MSCP policies and guidelines.
3. Produce sand and gravel with minimal harm and disturbance to adjacent property and communities.
4. Plan rehabilitation of depleted mineral areas to facilitate reuse consistent with state requirements, the Surface Mining and Reclamation Act (SMARA), and local planning goals and policies, including the MSCP.
5. Consider local evaporative salt production for future economic value, open space use, and for important ecological habitat.

The use of locally mined materials for San Diego's development is desirable as it reduces the need for trucking materials over long distances. This, in turn, results in decreased energy use, and reduced traffic, infrastructure, and air quality impacts, as well as lower direct costs to the consumer and local government. Local use may also result in fewer direct mining environmental impacts to remote, less regulated areas outside the City. Reclamation and recycling of building materials must take on a greater importance in order to continue meeting local needs. Recycling has the added benefit of reducing the amount of waste entering landfills.

Although the Draft General Plan proposes several policies aimed at protecting mineral resources, there is a potential for future land development that is consistent with the General Plan to impact these resources. Determinations of land use compatibility between a future project and significant mineral resources and the conflicts of mining within the MSCP preserve would be addressed through the entitlement process. Conflicting goals and policies between habitat and open space preservation and mineral extraction may lead to the loss of access to significant mineral resources, resulting in impacts.

Approval of the proposed project, the Draft General Plan, would not have a significant impact on the availability of mineral resources; however, future projects developed consistent with the General Plan may result in loss of significant mineral resources. It is infeasible at this Program EIR level to provide more specific mitigation that would reduce impacts to a less than significant level, since specific development projects are not known. Thus, potential impacts related to mineral resources are considered significant and unavoidable.

3.9.4 Mitigation Framework

No Mitigation Measures are available at the Program EIR level of review that could reduce significant impacts to important mineral resources.

3.9.5 Significance of Impact with Mitigation Framework

Goals, policies, and recommendations enacted by the City combined with the state and local regulations described above provide a framework for developing project level mineral resources mitigation measures for future discretionary projects. The City's process for the evaluation of discretionary projects includes environmental review and documentation pursuant to CEQA as well as an analysis of those projects for consistency with the goals, policies and recommendations of the General Plan. It is infeasible at this Program EIR level to provide specific mitigation that would reduce impacts to a less than significant level, since specific development projects are not known. Thus, there is a potential for significant unavoidable impacts related to mineral resources.

Notes and References

Surface Mining and Reclamation Act of 1975

Mineral Resource Zones

City of San Diego MSCP



THE CITY OF SAN DIEGO
General Plan

Program Environmental
Impact Report

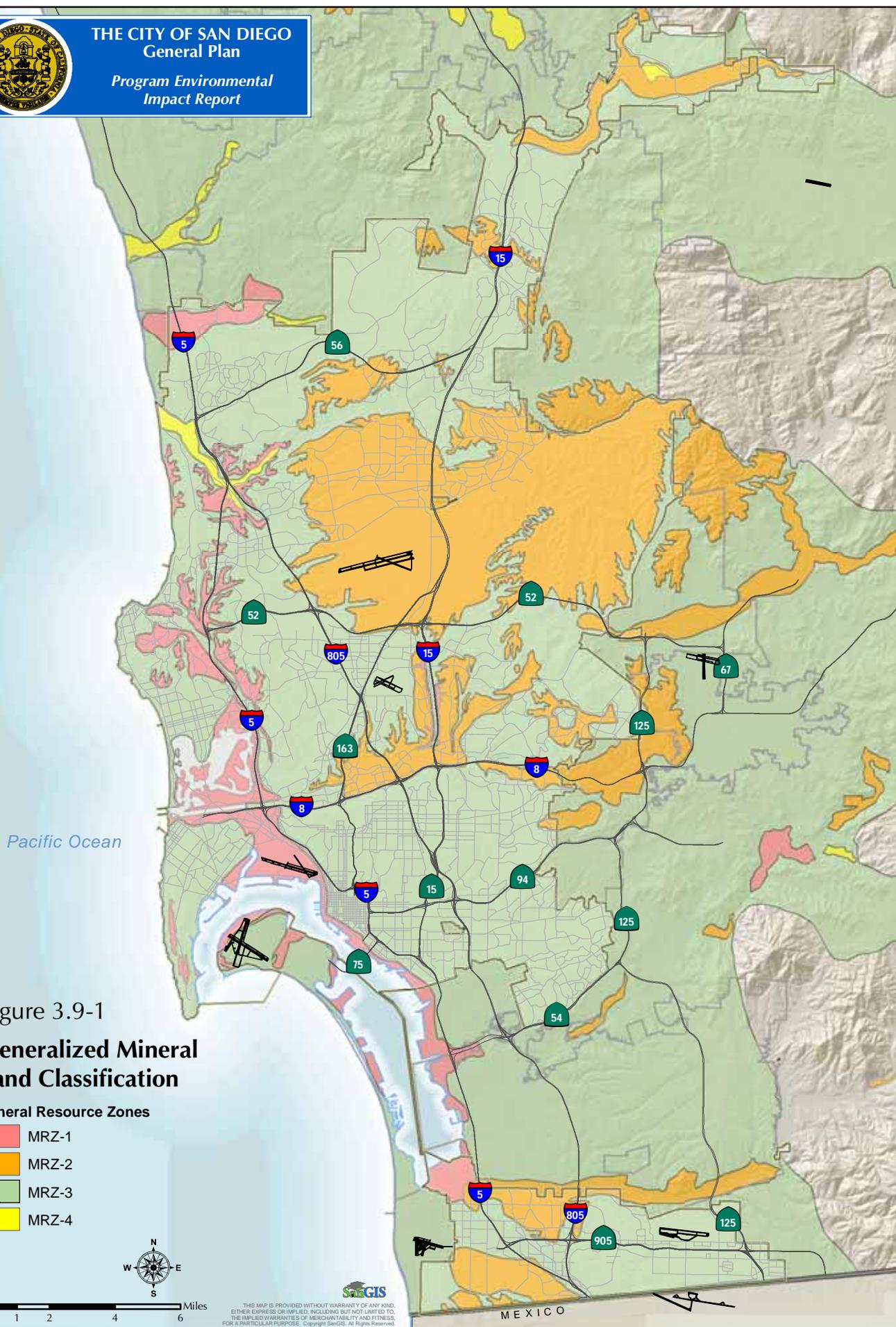


Figure 3.9-1
**Generalized Mineral
Land Classification**

Mineral Resource Zones

- MRZ-1
- MRZ-2
- MRZ-3
- MRZ-4



0 1 2 4 6 Miles

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3.10 Noise

This section examines whether long-term implementation of the Draft General Plan will expose persons in future uses to excessive noise levels or creates a substantial permanent or periodic increase in ambient noise within the City.

3.10.1 Existing Conditions

The City is primarily a developed and urbanized city, and an elevated ambient noise level is a normal part of the urban environment. Urban areas typically have a higher ambient noise level, which is the composite of noise from all normal background noise sources at a given location. The most prevalent noise sources in San Diego are from motor vehicle traffic on interstate freeways, state highways, and local major roads generally due to higher traffic volumes and speeds. Aircraft noise is also present in many areas of the City. Rail traffic and industrial and commercial activities contribute to the noise environment. Urban noises can also include, but are not limited to the following: construction, refuse vehicles, sporting/special events, and public activity noise, such as dogs barking, leaf blower, loud music or car alarms.

Definitions of Acoustical Terms

Noise can be defined as unwanted or objectionable sound. Whether a sound is undesirable is often dependent on the receiver's activity and time of the day. The same noise may be more annoying when a person is reading or studying than when he or she is watching television or doing something else that generates noise. Likewise, a siren in the middle of the night would usually be more annoying than one heard during the day. Excessively high noise levels can cause physical injury and adverse psychological effects.

Noise is commonly described in terms of decibels (dB). The healthy human hearing system can hear an extremely wide range of sound pressures. A decibel is measured logarithmically; by using logarithms, the decibel system condenses the wide range to one which is more convenient, covering 0 decibels (threshold of hearing) to 130 decibels (threshold of pain) (Harris 1991).

A-weighted sound pressure levels in decibels (dBA) are the most commonly used units of measure for community noise studies. A-weighted sound pressure levels represent an approximation of the frequency response of a healthy human hearing system. A-weighting takes into account the fact that humans are more sensitive to higher frequency sounds than lower frequency sounds.

Many different descriptors have been developed to evaluate community response to noise. The most widely used descriptors today are the average noise level (L_{eq}), the Community Noise Equivalent Level (CNEL), and the day/night average noise level (L_{dn} or DNL). The L_{eq} is the noise level equivalent to the actual time-varying noise level occurring over a specified period of time (usually 1 hour). The CNEL is a 24-hour measure of community noise exposure. The CNEL is an average of the L_{eq} that occur during a 24-hour period. However, when determining the 24-hour average, 5 dBA are added to the evening (7:00 p.m. to 10:00 p.m.) noise level

averages and 10 dBA are added to the nighttime (10:00 p.m. to 7:00 a.m.) noise level averages to account for added sensitivity to noise during these times. The L_{dn} is similar to the CNEL, except that the evening hours are not weighted.

Ambient Levels and Existing Noise Sources

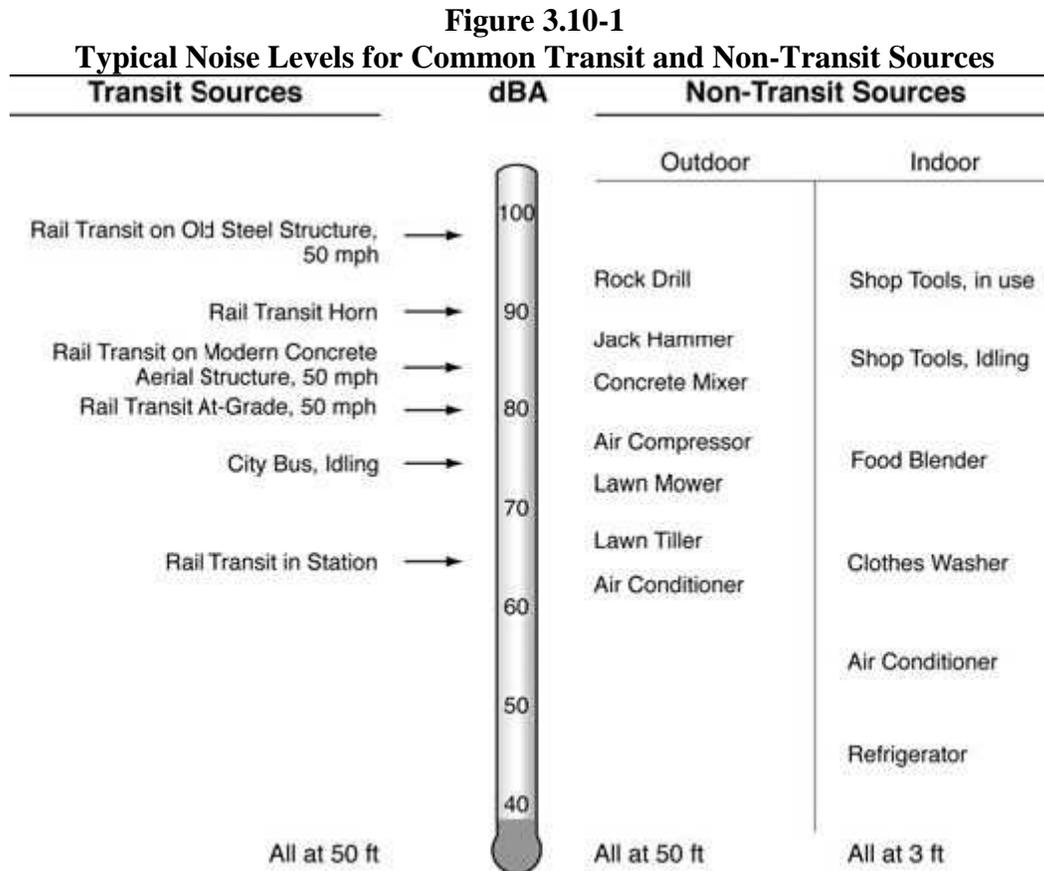
The ambient noise level is the all-encompassing noise associated with a given environment at a specified time. It is the composite of sound from many sources in all directions, near and far, with no particular sound being dominant (Harris 1991). Typical ambient levels range from 35 to 50 CNEL in rural and agricultural areas, 50 to 65 CNEL in suburban to urban areas, and 65 to 75 CNEL in downtown urban areas (EPA 1974).

The most prevalent noise generators in the City are vehicles on interstate freeways, state highways, and major local roadways) and aircraft (airplanes and helicopters flying overhead). Railroads, stationary industrial, commercial sources, and construction also contribute to the noise environment. Local collector streets are not considered a significant source of noise since traffic volume and speed are generally much lower than for freeways and major roadways. Both **Table 3.10-1** and Figure 3.10-1 identify common indoor and outdoor activities and sources of noise, and their typical level of noise generation on the dBA scale.

Table 3.10-1
Typical Noise Levels for Common Indoor and Outdoor Activities

Common Outdoor Activities	Noise Level (dBA)	Common Indoor Activities
	--110--	Rock Band
Jet Fly-over at 300 meters (1,000 feet)	--100--	
Gas Lawn Mower at 1 meter (3 feet)	--90--	
Diesel Truck at 15 meters (50 feet), at 80 km/hr (50 mph)	--80--	Food Blender at 1 meter (3 feet) Garbage Disposal at 1 meter (3 feet)
Noisy Urban Area, Daytime Gas Lawn Mower at 30 meters (100 feet)	--70--	Vacuum Cleaner at 3 meters (10 feet)
Commercial Area Heavy Traffic at 90 meters (300 feet)	--60--	Normal Speech at 1 meter (3 feet)
Quiet Urban Daytime	--50--	Large Business Office Dishwasher in Next Room
Quiet Urban Nighttime	--40--	Theater, Large Conference Room (Background)
Quiet Suburban Nighttime	--30--	Library
Quiet Rural Nighttime	--20--	Bedroom at Night, Concert Hall (Background)
	--10--	Broadcast/Recording Studio
Lowest Threshold of Human Hearing	--0--	Lowest Threshold of Human Hearing

Source: Caltrans, Technical Noise Supplement, Traffic Noise Analysis Protocol. October 1998.



Motor Vehicle Traffic Noise

The traffic noise generated on a roadway is dependent on traffic speed, volume, flow, vehicle mix (percentage of trucks), properly function vehicle muffler system, pavement type and condition, the use of barriers, as well as distance to the receptor. In general, the larger the traffic volume is on a roadway, the higher the noise levels that are generated on the roadway. This general condition exists until there is so much traffic that flow degrades and speeds decrease, which lowers noise levels. Roadways with large percentages of heavy trucks will generate higher noise levels. A heavy truck traveling 50 miles per hour (mph) generates about 85 dBA from a distance of ten feet, whereas a car traveling the same speed generates only 71 dBA. An increase of 10 dBA is usually perceived by the human ear as a “doubling” of sound volume (FHWA 1973).

The roadways, which generate the highest noise levels in the City, are the interstate freeways and state highways because they have the highest speed limits, the largest traffic volumes, and the most trucks. Highways typically generate 70 to 80 dBA CNEL at a receptor adjacent to the highway. Heavily used commuter roadways, such as arterials and major streets, also generate significant levels of noise, typically 65 to 75 dBA CNEL at an adjacent receptor. In the City of San Diego, there is a wide range of existing land uses that are located adjacent to interstate freeways, state highways and major streets, including residences, schools, churches, hospitals, shopping centers, industrial parks, agriculture, parks, and open space.

As well, vehicles such as refuse collection trucks, parking lot or street sweeper vehicles, delivery trucks, large buses, ambulances or other emergency vehicles can generate significant if only intermittent noise on local streets. These affect receptors in residential or other sensitive land uses adjacent to or nearby these streets, particularly in environments with greater density and during the late evening and early morning hours.

Rail Noise

Daily traffic from passenger (intercity and commuter) and freight train and light-rail transit (trolley) operations produces noise that may disrupt adjacent noise-sensitive uses. Generally, freight operations occur at all hours of the day and night while passenger rail operations are concentrated within the daytime and evening periods. Trains can generate high, relatively brief, intermittent noise events. As shown in **Table 3.10-1** above, train noise can be perceived well above 80-dBA. Train noise is an environmental concern for sensitive uses located along rail lines and in the vicinities of switching yards and at roadway-rail crossings.

Factors that influence the overall rail noise include the train speed, train horns, type of engine, track conditions, use of concrete cross ties and welded track, the intermittent nature of train events, time of day, and sound walls or other barriers. The interaction of steel wheels and rails generate primary rail noise. The latter source creates three types of noise: 1) rolling noise due to continuous rolling contact; 2) impact noise when wheels encounter a rail joint, turnout or crossover; and 3) squeal generated by friction on tight curves. To help address the rail noise associated with rail joints, rails are welded together on light rail and commuter rail lines as well as the use of concrete ties to hold the rails. When operating in residential areas, trains are required to travel at a reduced speed to minimize noise.

Federal regulations require trains to sound their horns at all roadway-rail grade crossings and the warning sound of train horns is a common sound experienced by communities near the rail corridor. Train air horns and crossing bell gates contribute to loud noise levels near grade crossings (U.S. DOT 2006). The federal minimum noise level for a train horn is 96 dB. In an effort to minimize excess train horn noise, the federal government allows local jurisdictions to establish train horn “quiet zones.” This requires the implementation of supplementary and alternative safety measures to compensate for loss of the train horn usage. The installation of grade separation at roadway-rail grade crossings can minimize train horn noise.

The California High-Speed Rail Authority ~~is studying two potential~~has selected the inland Interstate 15 as the preferred corridors for high-speed rail service that would connect the San Diego region to other regions in the state. Air turbulence noise generated from high-speed train traffic may affect noise-sensitive uses along the potential rail corridors

Aircraft Noise

Aircraft noise primarily affects communities within an airport influence area. The noise impact or the perceived annoyance depends upon the noise volume, length of the noise event and the time of day. In general, aircraft noise varies with the type and size of the aircraft, the power the

aircraft is using, and the altitude or distance of the aircraft from the receptor. Another variable affecting the overall impact of noise is a perceived increase in aircraft noise at night.

Aircraft noise is one of the factors that the state-required Airport Land Use Compatibility Plan addresses and has established policies for land use compatibility. The California Airport Noise Standards ([California Code of Regulations](#), Title 21) establishes the 65-dBA CNEL as the boundary for the normally acceptable level of aircraft noise for noise-sensitive land uses including residential uses near airports.

Since CNEL represents averaged noise exposure over a 24-hour period, there can be single event noise levels that may exceed the reported CNEL. Although there is no single event standard for aircraft noise exposure, the measurement of the duration and maximum noise levels during single event noises can assist in evaluating potential effects on future noise sensitive land uses.

Uses that have outdoor areas exposed to high levels of aircraft noise cannot mitigate noise levels to an acceptable level due to overflights. Noise-sensitive uses that have outdoor areas used daily by the occupants, such as schools for children and child care centers, are incompatible in areas that exceed the 65-dBA CNEL since mitigation measures cannot reduce exposure to outdoor play areas from prolonged periods of high aircraft noise.

Aircraft noise from civilian airports and military air installations within and adjacent to the City of San Diego is another major noise source. San Diego International Airport (SDIA) at Lindbergh Field is located near downtown and is surrounded by urban development [primarily containing residential and commercial uses](#) on three sides and the San Diego Bay to the south. The other civilian airports and military air installations within the City are Marine Corps Air Station (MCAS) Miramar; Montgomery Field, and Brown Field. The City owns and operates Montgomery Field and Brown Fields which serve general aviation aircraft. Airports outside the City of San Diego which could impact noise-sensitive land uses within the City include the following: the Naval Air Station (NAS) North Island, Naval Outlying Field (NOLF) Imperial Beach, and Tijuana International Airport.

~~San Diego County Regional Airport Authority (Airport Authority) services as the Airport Land Use Commission (ALUC) for San Diego County. The state requires that the ALUC prepare and adopt Airport Land Use Compatibility Plans (ALUCP) for all public and military airports in the county. The ALUCPs serve two principal purposes: to provide for the orderly growth of each public airport and the area surrounding the airport, and to safeguard the general welfare of the inhabitants within the vicinity of the airport and the public in general. Each ALUCP provides policies and criteria for land use compatibility for the areas around an airport known as an Airport Influence Area (AIA). Land use policies and criteria for each AIA incorporate safety, airspace protection, noise, and overflight considerations as specified by the state. The Airport Authority amended and adopted ALUCPs for all four airports in the City on October 4, 2004 and is in the process of preparing comprehensive updates for all four airports in the City as well as the adoption of new ALUCPs for NAS North Island and NOLF Imperial Beach. The ALUC is not preparing an ALUCP for the Tijuana International Airport since it is not within the jurisdiction of ALUC.~~

SDIA primarily handles commercial passenger service, although cargo transport, general aviation and military services make up a portion of the daily flights, and does affect existing residential areas. Military installation flights at MCAS Miramar and NAS North Island are less frequent, but are capable of producing considerably more noise than a passenger aircraft, which can affect existing residential areas. General aviation aircraft noise at Montgomery Field and Brown Field is more localized, but does affect existing residential areas. Helicopter operations at NOLF Imperial Beach primary affects open space and agricultural areas in the Tijuana River Valley. The existing aircraft noise contours are shown in **Figure 3.10-2, 3.10-3, and 3.10-4** and projected noise contours are shown in **Figures 3.10-5, 3.10-6, and 3.10-7** for SDIA, NAS North Island, MCAS Miramar, Montgomery Field, Brown Field and NOLF Imperial Beach respectively. The Figures listed above with the existing and projected noise contours also show generalized planned land use based on adopted community plans.

Aircraft operations at SDIA are limited by a curfew, which restricts departures between 11:30 p.m. and 6:30 a.m. though emergency medical, military aircraft, and aircraft delayed due to needed repairs may be exempt from this curfew. This greatly reduces the effect of air traffic noise on sensitive land uses during late night hours. Other mitigation monitoring programs implemented by the military and City airports, such as pilot awareness programs, help to further reduce unnecessary aircraft noise impacts on residential and other noise-sensitive land uses.

Helicopter operations are an additional source of aircraft noise within the City. Helicopter traffic typically affects areas near airports and military installations or, though they can affect areas near heliports as well. Low-flying helicopters or helicopters at night can be a particular nuisance to sensitive noise receptors.

Construction Noise

Construction can be another major, although typically short-term, source of noise. Construction is of most concern when it takes place near noise-sensitive land uses, occurs at night or in early morning hours. Noise from construction can also affect nearby wildlife by interfering with the ability to establish territory, vocalize, or successfully reproduce. Additional discussion of noise impacts to wildlife is provided in **Section 3.3 Biological Resources**. As discussed above, the City of San Diego typically regulates noise associated with construction equipment and activities through enforcement of noise ordinance standards, implementation of General Plan policies, and imposition of conditions of approval for building or grading permits. **Table 3.10-2** shows typical exterior noise levels at various phases of commercial construction.

**Table 3.10-2
Typical Construction Phase Noise Levels**

Equipment Item	Range of Noise Level at 50 Feet [dB(A)]	Nominal Noise Level, L_{eq}, at 50 Feet [dB(A)]
<i>Earthmoving</i>		
Backhoes, 200 HP	71 to 93	85
Berm Machine, 100 HP	74 to 84	80
Dozers	72 to 96	86
Front Loaders, 300 HP	71 to 96	82
Graders	73 to 95	85
Paver	80 to 92	89
Roller, 180 HP	78 to 84	79
Scrapers	73 to 95	88
Tractors, 200 HP	72 to 96	84
Trencher, 80 HP	76 to 86	82
Truck/Trailer, 200 HP	70 to 92	82
Truck: 125 HP, 150 HP	76 to 85	80, 82
<i>Materials Handling</i>		
Concrete Mixer	70 to 90	85
Concrete Pump	74 to 84	82
Crane, Moveable: 50, 400 HP	75 to 95	76, 83
Derrick	86 to 89	88
Forklift, 40 HP	68 to 82	80
Side Boom, 200 HP	80 to 90	85
Water Truck, 500 HP	79 to 88	84
<i>Stationary Equipment</i>		
Boiler, 1600 HP	79 to 85	82
Compressors: 100, 200 HP	68 to 87	78, 81
Generators: 20, 400, 1300 HP	69 to 81	74, 81, 84
Pumps: 25, 200, 350 HP	60 to 80	73, 76, 80
<i>Impact Equipment</i>		
Compactor, 20 HP	84 to 90	86
Jack Hammers	75 to 104	88
Pile Drivers (Peak Level)	90 to 104	101
Pneumatic Tools	82 to 88	86
Rock Drills	90 to 105	98
Steam Boiler (Pile Driver)	83 to 92	88
<i>Other Equipment</i>		

**Table 3.10-2
Typical Construction Phase Noise Levels**

Equipment Item	Range of Noise Level at 50 Feet [dB(A)]	Nominal Noise Level, L_{eq}, at 50 Feet [dB(A)]
Saws	67 to 92	78
Vibrators	69 to 80	76
Welding Machines: 50, 80 HP	76 to 85	80, 82

Other Noise Sources

Commercial and Mixed-Use Activity

Several other noise sources exist in the City of San Diego. Noise generated commercial activity including operations, maintenance, truck deliveries, ~~and~~ vehicular traffic, and high pedestrian traffic can affect adjacent noise sensitive uses and aboveground floor residential uses in mixed use buildings. Bars, restaurants, entertainment activities, events, and other facilities, which are active after 7:00 pm contribute to an urban noise environment that can affect residential or other sensitive land uses. City noise ordinances and existing construction guidelines both limit hours of operation and require noise level attenuation methods for continued operations to minimize the effect of noise on adjacent/above residential or sensitive land uses.

Industrial Activity

Industrial activity, like commercial activity, can be a source of noise, which can affect sensitive land uses in the City. The degree of noise generated by industrial uses is dependent upon various factors, including type of industrial activity, hours of operation, and the location relative to other land uses. In addition to traffic-related noises induced by industrial operations, on-site machinery can contribute to the ambient noise environment. Outdoor truck activity, air compressors, and generators are potential noise sources associated with industrial use that can interfere with noise-sensitive uses, which include residential uses. Like commercial activity, the City can monitor noise levels produced by industrial activity and enforce the Noise Abatement and Control Ordinance in order to reduce noise levels to acceptable levels, where sensitive receptors are impacted.

Event Activity

Large events, including sports and special events, occur intermittently throughout the year, which offer entertainment opportunities, but can also generate high noise levels at their source. Specific venues such as the downtown Ballpark, Qualcomm Stadium, or outdoor concert locations are designed to accommodate events that produce high noise levels. In addition, The City can permit special events throughout the City, although typically on City streets or parks. Part of this permitting process is to ensure that the event sponsors will adhere to the City's Special Event Ordinance, which limits the hours of event operation and noise levels depending on conditions such as specific location, surrounding land uses, and public benefit.

Refuse Vehicles, Parking Lot Sweepers, and Public Activity

Refuse vehicle and parking lot sweeper activity in all land use areas will temporarily elevate noise levels. Refuse vehicle and parking lot sweeper activities are necessary and noise control of these activities is limited. In an urban environment, excessive public noise such as barking dogs, leaf blowers, loud music, or car alarms can be disturbing, excessive, and annoying or offensive and cause discomfort or annoyance. The City's Noise Abatement and Control Ordinance addresses and limits excessive noise from these activities.

Regulatory Framework and Sensitive Land Use Noise Standards

Federal, state, and local governments all have roles in the regulation of noise.

Federal Regulatory Framework

The federal government establishes noise criteria for the interstate freeways and airports. Federal highway noise evaluation and abatement policies are contained in the U.S. Code of Federal Regulations, 23 CFR Part 772, *Procedures for Abatement of Highway Traffic Noise and Construction Noise*. As defined in 23 CFR 772, **Section 772.5(g)**, traffic noise impacts occur when the predicted traffic noise levels approach or exceed the noise abatement criteria (NAC), as shown in **Table 3.10-2**, or when predicted traffic noise levels substantially exceed the existing noise levels. The numerical criteria used in California to define "approach the NAC" and "substantially exceed the NAC" are stated in **Table 3.10-3** below.

**Table 3.10-3
FHWA Noise Abatement Criteria**

Activity Category	Hourly A-Weighted Sound Level (1) (dBA)		Description of Activity Categories
	Leq(h)	L10(h)	
A	57 (Exterior)	60 (Exterior)	Lands in which serenity and quiet are of extraordinary significance and serve an important public need, and where the preservation of those qualities is essential if the area is to continue to serve its intended purpose.
B	67 (Exterior)	70 (Exterior)	Picnic areas, recreation areas, playgrounds, active sport areas, parks, residences, motels, hotels, schools, churches, libraries, and hospitals.
C	72 (Exterior)	75 (Exterior)	Developed lands, properties, or activities not included in Categories A or B above.
D	--	--	Undeveloped lands.
E	52 (Interior)	55 (Interior)	Residences, motels, hotels, public meeting rooms, schools, churches, libraries, hospitals, and auditoriums.

⁽¹⁾ Either L₁₀(h) or L_{eq}(h) (but not both) may be used on a project.

⁽²⁾ Source: 23 CFR 772

If a noise impact is identified, abatement measures must be considered. In determining and abating traffic noise impacts, primary consideration is to be given to exterior areas. Abatement will usually be necessary only where frequent human use occurs and a lowered noise level would be of benefit. FHWA criteria also state that where there are no exterior activities to be affected

by the traffic noise, or where the exterior activities are far from or physically shielded from the roadway in a manner that prevents an impact on exterior activities, the interior criterion shall be used as a basis of noise impacts.

The National Environmental Policy Act (NEPA) is a federal statute that requires federal agencies to take environmental consequences into account when they make certain decisions. Under NEPA, impacts and measures to mitigate adverse impacts must be identified, including the identification of impacts for which no or only partial mitigation is possible. The FHWA regulations described in the above section constitute the Federal Noise Standard. Projects complying with this standard are also in compliance with the requirements stemming from NEPA.

The U.S. Department of Housing and Urban Development (HUD) requires that noise analysis and mitigation be provided in accordance with the HUD Noise Guidebook for projects receiving HUD funding. Minimum attenuation requirements are prescribed in Title 24 of the Code of Federal Regulations (24 CFR 51.104(a)) which are the HUD Environmental Criteria and Standards.

Federal Aviation Administration oversees the development of voluntary studies noise exposure and land use compatibility study prepared by airport operators as prescribed in Title 14 of the Code of Federal Regulations, Part 150. The Part 150 studies identify existing noise exposure, identify potential future noise exposure, and evaluate various alternatives to reduce the number of people affected by aircraft noise. The studies also provide recommendations as to viable noise abatement/mitigation measures to reduce the number of people affected by noise. FAA approved measures can be eligible for federal funding.

State Regulatory Framework

The California Department of Transportation (Caltrans) also uses Federal criteria for state routes as well as having noise standards for airports (California Code of Regulations, Title 21). The state establishes noise emission limits for individual vehicles. The state also has interior noise standards in the Uniform Building Code (California Code of Regulations, Title 24). **Table 3.10-4** outlines the interior and exterior noise standards set forth by Title 24, Part 2.

**Table 3.10-4
State of California Interior and Exterior Noise Standards**

Land Use	Noise Standards ¹	
	Interior ^{2,3}	Exterior
Residential – Single-family, multi-family, duplex, mobile home	CNEL 45 dB	CNEL 65 dB ⁴
Residential – Transient lodging, hotels, motels, nursing homes, hospitals	CNEL 45 dB	CNEL 65 dB ⁴
Private offices, church sanctuaries, libraries, board rooms, conference rooms, theaters, auditoriums, concert halls, meeting halls, etc.	L _{eq(12)} 45 dB(A)	--
Schools	L _{eq(12)} 45 dB(A)	L _{eq(12)} 67 dB(A) ⁵
General offices, reception, clerical, etc.	L _{eq(12)} 50 dB(A)	--
Bank, lobby, retail store, restaurant, pool, etc.	L _{eq(12)} 55 dB(A)	--
Manufacturing, kitchen, warehousing, etc.	L _{eq(12)} 65 dB(A)	--
Parks, playgrounds	--	CNEL 65 dB ⁵
Golf courses, outdoor spectator sports, amusement parks	--	CNEL 70 dB ⁵

1. CNEL: Community Noise Equivalent Level. Leq(12): The A-weighted equivalent sound level averaged over a 12-hour period (usually the hours of operations).

2. Indoor standard with windows closed. Mechanical ventilation would be provided per UBC requirements to provide a habitable environment.

3. Indoor environment excluding bathrooms, toilets, closets, and corridors.

4. Outdoor environment limited to rear yard of single-family homes, multi-family patios and balconies (with a depth of 6' or more) and common recreation areas.

5. Outdoor environment limited to playground areas, picnic area, and other areas of frequent human use.

Source: Title 24, Part 2, California Code of Regulations

The California Environmental Quality Act (CEQA) is a state statute that requires state, local, and other agencies subject to the jurisdiction of California to evaluate the environmental implications of their actions. The main objectives of CEQA are to disclose to decision makers and the public the significant environmental effects of proposed activities and to require agencies to avoid or reduce the environmental effects of proposed activities and to require agencies to avoid or reduce the environmental effects by implementing feasible alternatives or mitigation measures.

Under CEQA, a substantial noise increase may result in a significant adverse environmental effect and, if so, must be mitigated or identified as a noise impact for which it is likely that no, or only partial, abatement measures are available. Specific economic, social, environmental, legal, and technological conditions may make additional noise attenuation measures infeasible.

[Airport Land Use Commission Policies](#)

[San Diego County Regional Airport Authority \(Airport Authority\) serves as the Airport Land Use Commission \(ALUC\) for San Diego County. The state requires that the ALUC prepare and adopt Airport Land Use Compatibility Plans \(ALUCP\) for all public and military airports in the county. The ALUCPs serve two principal purposes: to provide for the orderly growth of each public airport and the area surrounding the airport, and to safeguard the general welfare of the inhabitants within the vicinity of the airport and the public in general. Each ALUCP provides policies and criteria for land use compatibility for the areas around an airport known as an](#)

Airport Influence Area (AIA). **Figure 3.5-4** shows airport locations and Airport Influence Areas that affect land use in the City. Land use policies and criteria for each AIA incorporate safety, airspace protection, noise, and overflight considerations as specified by the state. The state also requires that residential property owners within an AIA disclose to prospective buyers that the property is in the vicinity of an airport and could be subjected subject to some of the annoyances or inconveniences associated with proximity to airport operations such as noise.

In October 2004, the Airport Authority, as the ALUC, adopted amendments to the ALUCPs. As part of the amendment, the Airport Authority renamed from Comprehensive Land Use Plans (CLUPs) to Airport Land Use Compatibility Plans. The amendments did not change the noise contours or the noise - land use compatibility matrix. The matrix identifies if a proposed land use would be compatible with the level of aircraft noise using the noise contours in the ALUCPs. **Figure 3.10-8, 3.10-9, and 3.10-10** show the ALUCP aircraft noise contours for SDIA, Brown Field, and MCAS Miramar and Montgomery Field, respectively. Currently, NAS North Island and NOLF Imperial Beach do not have adopted ALUCPs in place.

In 2005, the Airport Authority released draft ALUCPs for all airports within the county. Currently, the Airport Authority is in the process of revising the draft ALUCPs for the airports within and adjacent to the City with a target adoption of late 2007 to early 2008. The ALUC is not preparing an ALUCP for the Tijuana International Airport since it is not within the jurisdiction of ALUC.

The Airport Authority will be including the projected noise contours shown in **Figure 3.10-5 3.10-6 and 3.10-7** for SDIA, MCAS Miramar and Montgomery Field, and Brown Field, respectively, in the updated ALUCPs. The projected noise contour data for MCAS Miramar is from the 2005 Air Installation Compatible Use Zone (AICUZ) Study for MCAS Miramar. The projected noise data for NAS North Island is from the published 1984 AICUZ study. For NOLF Imperial Beach, the projected noise data is from the 1989 AICUZ study. The U.S. Navy is in the process of preparing updated AICUZ studies with updated noise contours for NAS North Island and NOLF Imperial Beach, which are currently not available.

The AICUZ studies for all the installations contain noise - land use compatibility matrices. The military uses the AICUZ study matrix to determine the noise compatibility of proposed development projects AICUZ study area for each air installation. The Airport Authority will be incorporating the noise contours and the noise - land use compatibility matrix criteria from the published 2005 MCAS Miramar AICUZ study and the updated AICUZ studies for NAS North Island and NOLF Imperial Beach when published into the updated and new ALUCPs for those military air installations.

An ALUCP contains policies and criteria that address compatibility between airports and future land uses that surround them by addressing noise, overflight, safety, and airspace protection concerns to minimize the public's exposure to excessive noise and safety hazards within the airport influence area for each airport over a 20-year horizon. The 20-year horizon is based on information contained in a master plan or layout plan for an airport. Since the ALUC does not have land use authority, the City implements the ALUCPs through land use plans (General Plan, community plans, and specific plans), development regulations, and zoning ordinances.

When an ALUCP is amended or updated, the City, as the land use jurisdiction, is required to submit the land use plans that are within an airport influence area to the ALUC for a consistency determination. At the same time, when an action is proposed to amend or update a land use plan, airport plan (master plan or layout plan), development regulation, and/or zoning ordinance within an airport-influence area, the City is required to submit these actions to the ALUC for a consistency determination prior to adoption of the action. The City can revise the proposed action to meet determination made by the ALUC or the City Council may overrule their determination by a two-thirds vote if it makes specific findings that the proposed action is consistent with the purposes of protecting public health, safety, and welfare, minimizing the public's exposure to excessive noise, and minimizing safety hazards within areas surrounding the airport. Section 3.5 of this EIR addresses aircraft hazards.

The City implements the adopted ALUCPs with the Airport Environs Overlay Zone (AEOZ). The AEOZ boundaries use the 60 dB CNEL contours consistent with the ALUCPs for Brown Field, Montgomery Field, and MCAS Miramar. For SDIA, the AEOZ uses the 1999 annual noise contours rather than the 1990 projected noise contours from the ALUCP. Although the noise contour boundaries are consistent with the ALUCPs except for SDIA, the AEOZ boundaries cover less area than the boundaries of the airport influence area. The City has agreed to submit discretionary projects within the airport influence area for each airport in the City with an adopted ALUCP to the ALUC for consistency determinations up until the time when the ALUC adopts the updated ALUCPs and subsequently determines that the City's affected land use plans are consistent with the ALUCPs. The City will also amend the AEOZ or develop a new overlay zone to implement the updated ALUCPs. After which time, the City will only submit proposed amendments or updates to land use plans, airport plans, development regulations, and zoning ordinances within an adopted airport-influence area prior to final City Council approval as required by state law.

Local Regulatory Framework

Local jurisdictions have noise ordinances in their municipal codes to regulate stationary sources of noise and policies and guidelines in their general plans to limit the affect of noise on sensitive land uses. The City of San Diego Noise Ordinance defines noise and regulates it by land-use, and time of day as shown in **Table 3.10-5**. These standards represent the exterior noise level limits, as measured at the property boundary, which is used to determine noise impacts.

**Table 3.10-5
Noise Limits by Land Use and Time of Day**

Land Use Zone	Time of Day	One-Hour Average Sound Level (dB)
1. Single Family Residential	7 a.m. to 7 p.m.	50
	7 p.m. to 10 p.m.	45
	10 p.m. to 7 a.m.	40
2. Multi-Family Residential (Up to a maximum density of 1/2000)	7 a.m. to 7 p.m.	55
	7 p.m. to 10 p.m.	50
	10 p.m. to 7 a.m.	45
3. All other Residential	7 a.m. to 7 p.m.	60
	7 p.m. to 10 p.m.	55
	10 p.m. to 7 a.m.	50
4. Commercial	7 a.m. to 7 p.m.	65
	7 p.m. to 10 p.m.	60
	10 p.m. to 7 a.m.	60
5. Industrial or Agricultural	Any time	75

Source: SDMC §59.5.0401

For noise – land use compatibility planning, the City of San Diego currently uses the 1979 General Plan Land Use-Noise Level Compatibility Standards shown in **Table 3.10-6**. The City has an exterior noise level standard of 65 dB CNEL for noise-sensitive uses. These standards are designed to protect noise-sensitive land uses from high noise levels and to be used as guidelines in the planning for future land uses. Noise-sensitive land uses include, but are not necessarily limited to the following: residential, hospitals, nursing facilities, intermediate care facilities, educational facilities, libraries, museums, places of worship, child care facilities, and certain types of passive recreational parks and open space.

The City, as the operator of Montgomery Field, has adopted regulations that place limits on aircraft noise depending on the time of day. Daytime noise is limited to 88 dB from 6:30 a.m. - 11:30 p.m. Nighttime noise is limited to 70 dB from 11:30 p.m. to 6:30 a.m. These limits apply in residential areas near the airport. The regulations do include exemptions for public safety aircraft and emergencies. To limit larger and potentially noisier aircraft, the City restricts aircraft having a maximum certified take off gross weight greater than 20,000 pounds from using Montgomery Field.

**Table 3.10-6
1979 General Plan - Land Use-Noise Level Compatibility Standard**

		Annual Community Noise Equivalent Level in Decibels					
Land Use		50	55	60	65	70	75
1	Outdoor Amphitheaters (may not be suitable for certain types of music).	█	█	█			
2	Schools, Libraries	█	█	█	█		
3	Nature Preserves, Wildlife Preserves	█	█	█	█		
4	Residential-Single Family, Multiple Family, Mobile Homes, Transient Housing	█	█	█	█		
5	Retirement Home, Intermediate Care Facilities, Convalescent Homes	█	█	█	█		
6	Hospitals	█	█	█	█		
7	Parks, Playgrounds	█	█	█	█		
8	Office Buildings, Business and Professional	█	█	█	█	█	
9	Auditoriums, Concert Halls, Indoor Arenas, Churches	█	█	█	█	█	
10	Riding Stables, Water Recreation Facilities	█	█	█	█	█	█
11	Outdoor Spectator Sports, Golf Courses	█	█	█	█	█	█
12	Livestock Farming, Animal Breeding	█	█	█	█	█	█
13	Commercial-Retail, Shopping Centers, Restaurants, Movie Theaters	█	█	█	█	█	█
14	Commercial-Wholesale, Industrial Manufacturing, Utilities	█	█	█	█	█	█
15	Agriculture (except Livestock), Extractive Industry, Farming	█	█	█	█	█	█
16	Cemeteries	█	█	█	█	█	█



COMPATIBLE
The average noise level is such that indoor and outdoor activities associated with the land use may be carried out with essentially no interference from noise.



INCOMPATIBLE
The average noise level is so severe that construction costs to make the indoor environment acceptable for performance of activities would probably be prohibitive. The outdoor environment would be intolerable for outdoor activities associated with the land use.

The State Uniform Building Code (Title 24, Noise Insulation Standards) establishes interior noise levels of 45 dB CNEL for new hotels, motels, and multi-family residences due to exterior noise sources. The City of San Diego extends this 45 dB CNEL interior noise level requirement to single-family residences. Draft General Plan Noise – Land Use Compatibility Guidelines, as shown in **Table 3.10-7**, would replace the 1979 General Plan noise standards.

The Draft General Plan Noise – Land Use Compatibility Guidelines provide more detail than the 1979 noise standards and allow uses to be conditionally compatible. A conditionally compatible category allows land uses in a particular noise environment where mitigation techniques are demonstrated to have the ability to attenuate noise to acceptable levels for both indoor and outdoor environments. Another key difference of the draft guidelines is the establishments of noise-land use compatibility categories for multi-family land uses and for mixed residential-commercial or live-work land uses. The Draft General Plan noise guidelines are tailored to meet the needs of the City and the potential interaction of a combination of land uses in the urban environment. Although more detailed, the draft noise guidelines more closely resemble the state of California noise guidelines, as shown in **Table 3.10-8**.

**Table 3.10-7
Draft General Plan - Land Use - Noise Compatibility Guidelines**

Land Use Category	Exterior Noise Exposure (dBA CNEL)			
	60	65	70	75
<i>Open Space and Parks and Recreational</i>				
Community & Neighborhood Parks; Passive Recreation <u>Open Space</u> ; Natural Resources Preservation ; Park Maintenance Facilities				
Regional Parks ; Outdoor Spectator Sports, Golf Courses; Athletic Fields; Outdoor Spectator Sports, Water Recreational Facilities; Horse Stables; <u>Park Maintenance Facilities</u>				
<i>Agricultural</i>				
Crop Raising & Farming; Aquaculture, Dairies; Horticulture Nurseries & Greenhouses; Animal Raising, Maintain & Keeping; Commercial Stables				
<i>Residential</i>				
Single Units; Mobile Homes; Senior Housing		45		
Multiple Units; Mixed-Use Commercial/Residential; Live Work; <u>Group Living Accommodations</u> *For uses affected by aircraft noise, refer to Policies NE-D.2, NE-D.3. , & NE-D.4		45	45*	
<i>Institutional</i>				
Hospitals; Nursing Facilities; Intermediate Care Facilities; <u>Kindergarten through Grade 12</u> Educational Facilities; Libraries; Museums; Places of Worship; Child Care Facilities		45		
Vocational or Professional Educational Facilities ; <u>Higher Education Institution Facilities (Community or Junior Colleges, Colleges, or Universities)</u>		45	45	
Cemeteries				
<i>Sales</i>				
Building Supplies/Equipment; Food, Beverages & Groceries; Pets & Pet Supplies; Sundries, Pharmaceutical, & Convenience Sales; Wearing Apparel & Accessories			50	50
<i>Commercial Services</i>				
Building Services; Business Support; Eating & Drinking; Financial Institutions; Assembly & Entertainment; Radio & Television Studios; Golf Courses <u>Support</u>			50	50
Visitor Accommodations (Hotels & Motels)		45	45	45
<i>Offices</i>				
Business & Professional; Government; Medical, Dental & Health Practitioner; Regional & Corporate Headquarters			50	
<i>Vehicle and Vehicular Equipment Sales and Services Use</i>				
Commercial or Personal Vehicle Repair & Maintenance; Commercial or Personal Vehicle Sales & Rentals; Vehicle Equipment & Supplies Sales & Rentals; <u>Vehicle Parking</u>				
<i>Wholesale, Distribution, Storage Use Category</i>				
Equipment & Materials Storage Yards; Moving & Storage Facilities; Warehouse; Wholesale Distribution ; Mining & Extractive Industries				
<i>Industrial</i>				
Heavy Manufacturing; Light Manufacturing; Marine Industry; Research & Development				

**Table 3.10-7
Draft General Plan - Land Use - Noise Compatibility Guidelines**

Land Use Category	Exterior Noise Exposure (dBA CNEL)			
	60	65	70	75
Trucking & Transportation Terminals; <u>Mining & Extractive Industries</u>				
<u>Research & Development</u>			<u>50</u>	

**Table 3.10-7
Draft General Plan - Land Use - Noise Compatibility Guidelines (continued)**

	Compatible	Indoor Uses	Standard construction methods should attenuate exterior noise to an acceptable indoor noise level. Refer to Section I
		Outdoor Uses	Activities associated with the land use may be carried out.
	Conditionally Compatible	Indoor Uses	Building structure must attenuate exterior noise to the indoor noise level indicated by the number for occupied areas. Refer to Section I.
		Outdoor Uses	Feasible noise mitigate techniques should be analyzed and incorporated to make the outdoor activities acceptable. Refer to Section I.
	Incompatible	Indoor Uses	New construction should not be undertaken.
		Outdoor Uses	Severe noise interference makes outdoor activities unacceptable.

Notes: Single Unit residential is also referred to as single family residential. Multiple Unit residential is also referred to as multi-family residential.

**Table 3.10-8
Land Use Compatibility for Community Noise Environment**

Land Use Category	Community Noise Exposure <i>L_{dn}</i> or <i>CNEL</i> , dB					
	55	60	65	70	75	80
Residential - Low Density Single Family, Duplex, Mobile Homes	[Bar chart showing noise exposure levels for Residential - Low Density]					
Residential - Multi. Family	[Bar chart showing noise exposure levels for Residential - Multi. Family]					
Transient Lodging - Motels, Hotels	[Bar chart showing noise exposure levels for Transient Lodging - Motels, Hotels]					
Schools, Libraries, Churches, Hospitals, Nursing Homes	[Bar chart showing noise exposure levels for Schools, Libraries, Churches, Hospitals, Nursing Homes]					
Auditoriums, Concert Halls, Amphitheaters	[Bar chart showing noise exposure levels for Auditoriums, Concert Halls, Amphitheaters]					
Sports Arena, Outdoor Spectator Sports	[Bar chart showing noise exposure levels for Sports Arena, Outdoor Spectator Sports]					
Playgrounds, Neighborhood Parks	[Bar chart showing noise exposure levels for Playgrounds, Neighborhood Parks]					
Golf Courses, Riding Stables, Water Recreation, Cemeteries	[Bar chart showing noise exposure levels for Golf Courses, Riding Stables, Water Recreation, Cemeteries]					
Office Buildings, Business Commercial and Professional	[Bar chart showing noise exposure levels for Office Buildings, Business Commercial and Professional]					
Industrial, Manufacturing, Utilities, Agriculture	[Bar chart showing noise exposure levels for Industrial, Manufacturing, Utilities, Agriculture]					

INTERPRETATION:

Normally Acceptable
Specified land use is satisfactory, based upon the assumption that any buildings involved are of normal conventional construction, without any special noise insulation requirements.

Conditionally Acceptable
New construction or development should be undertaken only after a detailed analysis of the noise reduction requirements is made and needed noise insulation features included in the design. Conventional construction, but with closed windows and fresh air supply systems or air conditioning will normally suffice.

Normally Unacceptable
New construction or development should generally be discouraged. If new construction or development does proceed, a detailed analysis of the noise reduction requirements must be made and needed noise insulation features included in the design.

Clearly Unacceptable
New construction or development should generally not be undertaken.

Source: State of California 1998.

3.10.2 Thresholds of Significance

A significant impact could occur if implementation of the General Plan:

- Results in exposure of noise-sensitive land uses to future noise levels which exceed those established in the adopted *General Plan and Progress Report*, community plans, noise ordinance, Airport Land Use Compatibility Plans (ALUCPs), or applicable standards of other agencies;
- Results in a substantial increase in the existing ambient noise levels; or,
- Results in increased land use incompatibilities associated with noise.

3.10.3 Impact Analysis

Could implementation of the Draft General Plan result in exposure of noise-sensitive land uses to future noise levels which exceed those established in the adopted General Plan, community plans, noise ordinance, ALUCPs, or applicable standards of other agencies?

Sensitive noise land uses are, in general, those areas of human habitation or substantial use where the intrusion of noise has the potential to adversely impact the occupancy, use, or enjoyment of the environment. Noise-sensitive land uses include, but are not necessarily limited to residential, hospitals, nursing facilities, intermediate care facilities, educational facilities, libraries, museums, places of worship, child care facilities, and certain types of passive recreational parks and open space.

Construction Impacts

Construction activities related to implementation of the Draft General Plan would potentially generate short-term noise impacts to noise-sensitive land uses located adjacent to construction sites. As outlined in **Table 3.10-7**, some construction activities have the potential to produce noise in excess of 75 dB(A) L_{eq} , and could therefore be potentially significant if their activity is heard by sensitive receptors. However, the City regulates noise associated with construction equipment and activities through enforcement of noise ordinance standards (e.g., days of the week and hours of operation) and imposition of conditions of approval for building or grading permits.

The Draft General Plan contains a policy limiting the impact of non-emergency construction activities in residential areas in relationship to the noise ordinance. However the City could permit construction at night where noise levels could be in excess of 75 dB(A) on limited basis where nighttime construction is deemed necessary and the construction is found to be in the public interest. Therefore, noise related to construction activities associated with implementation of the Draft General Plan could have a significant impact. Strict enforcement of the City Noise Ordinance and other applicable regulations, limitation of construction hours, implementation of Draft General Plan policies, and limiting after-hours construction to only highly necessary cases would reduce any construction noise impacts. Because the degree of impact and applicability, feasibility, and success of these measures cannot be adequately known for each specific project

at this program level of analysis, the program level impact related to noise remains significant and unavoidable.

Transportation Impacts

Population growth and increased economic and development activity in the City would increase during implementation of the General Plan. Based on adopted community plan land use, SANDAG has forecasted that up to 119,800 additional housing units in the City could be built by 2030 as well as additional non-residential development that would provide approximately 198,000 additional jobs. Most of the new development will occur in existing developed communities consistent with adopted community plans.

That increase has the potential to increase noise generated by various transportation modes affecting both human and wildlife receptors. The Draft General Plan policies provide a framework for supporting future development in existing areas where the urban environment already sustains a higher noise level than less developed areas and would avoid major increases in noise in those less developed areas. Increases in goods movement call for increased traffic in several modes, particularly rail, air cargo, and trucks. The Draft General Plan includes policies for distancing or buffering future noise-sensitive land uses from existing or future industrial uses. The Draft General Plan policies seek to reconcile the effect of increased noise by encouraging more efficient land use, congestion management, transportation, and goods movement policies. As part of future community plan updates, the City will include noise studies to analyze existing and projected noise levels for transportation related noise.

Transportation system improvements occurring during implementation of the Draft General Plan could result in either beneficial or adverse noise impacts. For example, implementation of some of the transportation improvements associated with the Draft General Plan could be beneficial by reducing the rate of increase of the number of vehicles traveling the roadway system in the City, but also could be adverse by increasing the rate of use of buses and trains, which can generate more noise per vehicle.

One of the tools used by the City to evaluate the impact from noise on development projects is the “Significance Determination Thresholds,” which provide consistent guidance to the City as to when projects are considered to have significant environmental impacts. The Significance Determination Thresholds are included as Appendix A of the City Land Development Manual. The noise section of these Thresholds address interior and exterior noise impacts from traffic generated noise by providing the general thresholds of significance for uses affected by traffic noise.

Motor Vehicle Traffic Noise

The SANDAG forecasted increase in housing units and jobs by 2030 is expected to lead to an increase in the level of motor vehicle traffic as addressed in PEIR Section 3.15. An increase in motor vehicle traffic has the potential to increase motor vehicle traffic related noise. It is likely that the greatest increase in motor vehicle traffic noise will be on interstate freeways, state highways, and major roadways in the City. Development of mixed-use land uses or multi-family residential land uses on transit corridors along major roadways in existing urban areas could also

expose more people to the higher levels of noise generated by higher traffic volume roadways. Thus, transportation improvements associated with the Draft General Plan could create noise impacts on noise-sensitive land uses.

The Draft General Plan includes policies to minimize vehicle traffic noise impacts on noise-sensitive land uses. These policies encourage planning of noise-compatible land uses, traffic control measures to slow traffic and thus reduce vehicle traffic noise in noise-sensitive locations, the provision of alternative transportation modes, rerouting of truck routes, landscaping and use of other design features, and enforcement of the state vehicle code to ensure that vehicles are not producing excessive noise. An increase in motor vehicle traffic would yield a proportionate increase in noise in areas adjacent to freeways, state highways, and major roads in the City and thus could create a significant impact on sensitive noise land uses.

Transit Impacts

~~Development of mixed-use land uses or more intense residential land uses on transit corridors and light rail and bus rapid transit stations could also expose more people to the higher levels of noise generated by higher traffic volume transit corridors. Thus, transportation improvements associated with the Draft General Plan could create noise impacts on noise-sensitive land uses.~~

The Regional Transportation Plan – MOBILITY 2030 (RTP) produced by SANDAG includes major transit improvements designed to improve and expand services and increase transit ridership. The regional policies and actions, which could affect the noise environment in the City, include the following:

- Expansion of the transit system to areas currently not being served;
- Improved and increased service for the San Diego to Los Angeles rail corridor;
- Increased frequency of bus service in urban areas; and
- Increased construction of residential based transit centers.

Transportation improvements associated with the Draft General Plan could create noise impacts on noise-sensitive land uses. Impacts include the potential for future development within the transit vehicle noise areas. Development of mixed-use land uses or multi-family residential land uses on transit corridors and light rail and bus rapid transit stations could also expose more people to the higher levels of noise generated by higher traffic volume transit corridors. Additional residential development within these areas would increase the number of land uses exposed to noise levels that could potentially exceed acceptable levels and thus could create a significant impact on sensitive noise land uses.

~~The Draft General Plan includes policies to minimize vehicle traffic noise impacts on noise-sensitive land uses. These policies encourage planning of noise-compatible land uses, traffic control measures to slow traffic and thus reduce vehicle traffic noise in noise-sensitive locations, the provision of alternative transportation modes, rerouting of truck routes, landscaping and use of other design features, and enforcement of the state vehicle code to ensure that vehicles are not producing excessive noise.~~

Intercity and Commuter Rail Impacts

~~Expanded intercity and commuter rail service is expected to reduce traffic demand on freeways and major arterials. These decreases in traffic volumes would not significantly decrease noise levels from the freeways, because the freeways will retain a large volume of trucks and passenger vehicles traveling at high speeds. Additionally, if rail service is located in the same corridor as the freeway, localized noise levels could remain high or even increase at certain locations. In addition, reductions in traffic volumes could lead to slight increases in noise as traffic speeds increase. None of these factors are expected to make major differences in noise volumes in heavily traveled corridors, since increases in vehicle traffic volumes of approximately 50 percent would be required to make a 3 dB difference in traffic noise, which is generally the level that is perceived by the human ear.~~

~~The Draft General Plan includes policies to minimize fixed rail noise on sensitive land uses, though these policies are directed at noise receivers and cooperation with other agencies as the City does not build or maintain rail lines. These policies encourage site planning of noise-sensitive uses away from rail corridors, cooperation with other authorities to implement noise attenuation features on rail systems, and establishing train horn “quiet zones”.~~

Alternate Modes/Intermodal Impacts

The promotion and increased use of bicycles as an alternative mode of transportation in the City would not create noise impacts. The change in traffic volumes on major roadways due to an increase in bicycle trips would not be great enough to cause a substantial decrease in noise levels.

Aircraft Impacts

Future land use planning within airport influence areas should ensure the compatibility of new development with airport operations, and phase out incompatible uses to the extent possible. With the exception of SDIA, the Draft General Plan contains policies limiting future residential uses in airport influence areas above the 65 dB CNEL. The adopted General Plan Land Use-Noise Level Compatibility Standard allows residential use up to the 65 dBA CNEL. The state general plan guidelines identify residential use above the 75 dBA CNEL as not being compatible.

Given the location of SDIA in the urban center of the City and the presencets of existing residential uses and higher ambient noise levels, the Draft General Plan contains policies that would conditionally allow future multi-family residential uses and residential mixed uses above the projected 65 dB CNEL. The policies that would conditionally allow future multi-family residential uses and residential mixed uses above the projected 65 dB CNEL in areas with existing residential uses and consistent with adopted community plans and the Airport Land Use Compatibly Plan for SDIA., which- This could result in an impact to people living in future residential areas-uses near SDIA.

The adopted Airport Land Use Compatibility Plans for each airport contain ~~conditions-policies and criteria that the City is required to implement or overrule the ALUC. For residential uses and other noise sensitive uses~~ located in areas above the 60 dB CNEL, ~~the ALUCPs contain policies that place conditions~~, such as sound attenuation to reduce interior noise levels to 45 dB. ~~The adopted ALUCP for Brown Field, Montgomery Field, and MCAS/NAS Miramar contain policies that limit residential uses above the 65 dB CNEL. The adopted ALUCP for SDIA contains policies that conditionally allows residential uses up to 85 dB CNEL. and-Where developments are conditionally allowed in areas above the 60 dB CNEL, the ALUCPs require aviation easements, which are required by jurisdictions to ensure that future residential and other noise sensitive development surrounding the airports is are compatible for noise. Specifically for noise, aviation easements provide the airport operator the right to subject the property to noise associated with normal airport activity. An increase in aircraft traffic would yield a proportionate increase in noise and vibration in areas adjacent to airports and thus could create a significant impact on sensitive noise land uses.~~

~~Overall, there may be a significant impact on sensitive noise land uses as a result of transportation noise impacts from implementation of the Draft General Plan.~~

~~The above policies, along with adherence to federal, state, and local noise regulations, serve to preclude or reduce significant impacts to a degree, but cannot guarantee that all future project level impacts will be avoided or mitigated to a level less than significant. Therefore, impacts associated with transportation noise are significant at the program level. Mitigation Framework Measures have been identified to reduce these program level impacts. Because the degree of impact and applicability, feasibility, and success of these measures cannot be adequately known for each specific project at this program level of analysis, the program level impact related to noise remains significant and unavoidable.~~

Rail Impacts

Intercity and Commuter

~~Expanded intercity and commuter rail service is expected to reduce traffic demand on freeways and major arterials. These decreases in traffic volumes would not significantly decrease noise levels from the freeways, because the freeways will retain a large volume of trucks and passenger vehicles traveling at high speeds. Additionally, if rail service is located in the same corridor as the freeway, localized noise levels could remain high or even increase at certain locations. In addition, reductions in traffic volumes could lead to slight increases in noise as traffic speeds increase. None of these factors are expected to make major differences in noise volumes in heavily traveled corridors, since increases in vehicle traffic volumes of approximately 50 percent would be required to make a 3 dB difference in traffic noise, which is generally the level that is perceived by the human ear.~~

Freight Rail Impacts

Data provided by SANDAG indicate that reopening of the San Diego and Arizona Eastern Railway (SD&AE) will result in elimination of up to 20,000 trucks annually from the highways in the San Diego region after 10 years of operation (SANDAG 1999). Rehabilitation of the 70-mile Desert Line portion of the SD&AE would extend freight service between San Diego and Tecate to the Imperial Valley. To the extent that truck trips are removed from highways as a result, noise generated by trucks would decline or not increase as rapidly.

The RTP also includes actions to encourage more efficient intermodal transportation of goods. The number of freight trains currently operating each day in San Diego is dependant upon the demands of the industries using rail services and can vary greatly from day to day. Currently, the Burlington Northern and Santa Fe (BN&SF) and the San Diego and Imperial Valley (SDIV) railroads transport rail freight in the San Diego region. Currently, the BN&SF runs approximately four freight trains per day between San Diego and the Greater Los Angeles area (two in each direction). Locally, increases in rail transit tonnage would increase the number of freight trains. However, these trains would likely operate on an as needed basis and would not have a fixed schedule. Therefore, noise levels and frequency of pass-bys would continue to vary greatly from day to day. On some days, there may be no increase in freight train activity.

The Draft General Plan includes policies to minimize fixed-rail noise on sensitive land uses, though these policies are directed at noise receivers and cooperation with other agencies as the City does not build or maintain rail lines. These policies encourage site planning of noise-sensitive uses away from rail corridors, cooperation with other authorities to implement noise attenuation features on rail systems, establishing train horn “quiet zones”, and installing grade separation at existing roadway-rail grade crossings. Overall, however, aAn increase in train traffic would yield a proportionate increase in noise and vibration in areas adjacent to rail corridors and thus could create a significant impact.

Overall Transportation Impacts

Overall, there may be a significant impact on sensitive noise land uses as a result of transportation noise impacts from implementation of the Draft General Plan. The above policies, along with adherence to federal, state, and local noise regulations, serve to preclude or reduce significant impacts to a degree, but cannot guarantee that all future project level impacts will be avoided or mitigated to a level less than significant. Therefore, impacts associated with transportation noise are significant at the program level. Mitigation Framework Measures have been identified to reduce these program level transportation related noise impacts. Overall, Bbecause the degree of impact and applicability, feasibility, and success of these measures cannot be adequately known for each specific project at this program level of analysis, the program level impact related to noise remains significant and unavoidable.

Commercial, Mixed-Use, and Industrial Noise

The Draft General Plan allows for development of commercial and industrial-mixed-use residential land uses, which could result in the generation of unacceptable noise levels.

~~Furthermore, collocation permissibility policies of the Draft General Plan between residential or other sensitive noise and industrial or commercial uses exacerbate the potential for noise impacts on sensitive receptors. Specifically, t~~The Draft General Plan policies encouraging mixed-use development can allow for significant intermittent or continuous operational noise impacts on sensitive receptors. Noise generated commercial activity impacts to adjacent or aboveground floor residential uses in a mixed-use development include operations, maintenance, truck deliveries, vehicular traffic and high pedestrian traffic.

The Draft General Plan allows for development of industrial land uses, which could result in the generation of unacceptable noise levels. Furthermore, co-location policies of the Draft General Plan that could allow the development of residential uses adjacent to industrial uses could exacerbate the potential for noise impacts on sensitive receptors. The policies encouraging co-location development could allow for significant intermittent or continuous operational noise impacts on sensitive receptors. The Draft General Plan also contains policies encouraging commercial and industrial operators to utilize practices to reduce noise impacts to adjacent noise sensitive uses. Noise generated industrial activity impacts to adjacent residential uses include operations, maintenance, truck deliveries, and vehicular traffic.

These impacts are potentially significant and unavoidable. Draft General Plan policies support limits on the hours of operation, require sound attenuation methods, or otherwise reduce the level of impact of these noise sources. These policies, along with adherence to federal, state, and local noise regulations, serve to preclude or reduce significant impacts to a degree, but cannot guarantee that all future project level impacts will be avoided or mitigated to a level less than significant. Because the degree of impact and applicability, feasibility, and success of these measures cannot be adequately known for each specific project at this program level of analysis, the program level impact related to commercial and industrial noise remains significant and unavoidable.

Event Noise

The Draft General Plan acknowledges the occurrence of events, whether they are regular events held at the downtown Ballpark or Qualcomm Stadium, or special civic or entertainment events held at various locations. These events have the potential to generate significant noise levels that would affect nearby sensitive receptors and land uses. The Draft General Plan contains policies to address these impacts. These policies, along with adherence to federal, state, and local noise regulations, serve to preclude or reduce significant impacts to a degree, but cannot guarantee that all future project level impacts will be avoided or mitigated to a level less than significant. Therefore, impacts associated with event noise are significant at the program level. Mitigation Framework Measures have been identified to reduce these program level impacts. Because the degree of impact and applicability, feasibility, and success of these measures cannot be adequately known for each specific project at this program level of analysis, the program level impact related to event noise remains significant and unavoidable.

Could implementation of the Draft General Plan result in a substantial increase in the existing ambient noise levels?

Population growth and increased economic and development activity in the City would increase during implementation of the General Plan. Based on adopted community plan land use,

SANDAG has forecasted that up to 119,800 additional housing units in the City could be built by 2030 as well as additional non-residential development that would provide approximately 198,000 additional jobs. Most of the new development will occur in existing developed communities consistent with adopted community plans.

That increase has the potential to increase noise generated by various transportation modes, stationary sources and related activities affecting both human and wildlife receptors. The Draft General Plan policies provide a framework for supporting future development in existing areas where the urban environment already sustains a higher noise level than less developed areas and would avoid major increases in noise in those less developed areas. Increases in goods movement call for increased traffic in several modes, particularly rail, air cargo, and trucks. The Draft General Plan includes policies for distancing or buffering future noise-sensitive land uses from existing or future industrial uses. The Draft General Plan policies seek to reconcile the effect of increased noise by encouraging more efficient land use, congestion management, transportation, and goods movement policies.

These policies, along with adherence to federal, state, and local noise regulations, serve to preclude or reduce significant impacts to a degree, but cannot guarantee that all future project level impacts will be avoided or mitigated to a level less than significant. Therefore, impacts associated with increase ambient noise are significant at the program level. The General Plan PEIR identifies Mitigation Framework Measures to reduce these program level impacts. Because the degree of impact and applicability, feasibility, and success of these measures cannot be adequately known for each specific project at this program level of analysis, the program level impact related to ambient noise remains significant and unavoidable.

Could implementation of the proposed General Plan result in increased land use incompatibilities associated with noise?

The Draft General Plan proposes a change in the Land Use – Noise Compatibility Guidelines (**Table 3.10-7**) from that currently adopted by the City of San Diego in the 1979 *General Plan and Progress Guide* (**Table 3.10-6**) and the California Environmental Quality Act (CEQA) Significance Determination Thresholds. The revised chart more closely resembles that established by the state of California (**Table 3.10-8**) and creates a “conditionally compatible” category, which permits building of a particular use in an exterior noise exposure environment with the condition of noise attenuation measures that would bring noise experienced by receptors down to specific, non-offensive levels. It furthermore expands upon, more clearly describes, and more logically groups the land uses.

As described above, the implementation of the Draft General Plan could potentially locate multi-family residential land uses in areas experiencing 65 dBA CNEL or higher noise levels (except for aircraft noise in the Brown Field, Montgomery Field, MCAS Miramar Airport Influence Areas), and therefore subject them to a higher level of existing and future noise. New development would be subject to building development standards, the City’s Noise Ordinance, Title 24, and other regulations.

Policies are identified in the Draft General Plan that will help to reduce the exposure of

residential and other noise-sensitive land uses to excessive noise. Land use compatibility is addressed through policies aimed at providing noise attenuation to reduce interior noise levels, buffers between incompatible land uses, assuring the appropriateness of proposed developments relative to noise levels, and limiting noise-sensitive land uses in areas exposed to high levels of noise. Noise-generating land uses like commercial, industrial, mixed-use activity, or entertainment and events have specific policies directed at minimizing the exposure of noise generated from these land uses on nearby noise-sensitive land uses. These policies include encouraging noise attenuation structures in the design, limiting the hours of operation or truck deliveries, limiting outdoor activities that generate noise, and coordination of special events.

As described above, transportation noise could significantly increase with implementation of the Draft General Plan. The Airport Land Use Compatibility Plans provide policies for the orderly growth of future development in airport influence areas to ensure that there are no land use incompatibilities with airport operations, including excessive noise levels to safeguard the general welfare of the inhabitants and public within the vicinity of the airport. The projected airport noise contours for airports within the City as well as generalized planned land use based on adopted community plans are shown in **Figures 3.10-45, 3.10-56, and 3.10-67.**

The Draft General Plan contains policies that will minimize the impact of aircraft-generated noise on noise-sensitive land uses and receptors. These policies include limiting future residential uses in airport influence areas to the 65 dBA CNEL except for SDIA.

For SDIA, the Draft General Plan policies would a-conditionally limit future single-family residential uses to the 65 dBA CNEL -and would conditionally ~~permit these limit~~ multi-family and mixed-use residential uses in an environment up to 70 dBA CNEL. Although not normally compatible, the City would allow multi-family and mixed-use residential uses up to the 75 dBA CNEL in areas in areas surrounding SDIA with existing residential uses that are designated for multi-family or mixed-use residential consistent with adopted community plans and the Airport Land Use Compatibility Plan for SDIA if feasible mitigation measures can be implemented.

The generalized community plan land use for areas above the 70 dB CNEL projected noise contour for SDIA is shown on **Figure 3.10-5.** The adopted Downtown and Uptown community plans designate properties for multi-family and mixed-use residential uses above the 75 dBA CNEL. Within both of these communities, there are existing residential uses above the 75 dBA. The adopted ALUCP currently in place contains polices that conditionally allows residential uses up to the 85 dBA CNEL. **Figure 3.10-8** shows the adopted ALUCP noise contours for SDIA.

–The Draft General Plan policies also encourage noise compatibility with land uses, discourage outdoor uses where airport noise impact levels are high, and encourage civilian and military airport operators to monitor noise and implement noise-reducing operation measures. Within the City, there are areas with existing residential uses where existing noise levels exceeds 70 dBA CNEL, however, these existing impacts would continue with or without implementation of the Draft General Plan. Although not normally compatible, multiple unit and mixed-use residential uses would be conditionally allowed up to the 75-dBA CNEL in areas affected primarily by motor vehicle traffic noise with existing residential uses that are designated for multiple unit or mixed-use residential if feasible mitigation measures can be implemented.

The policies identified above, along with adherence to federal, state, and local noise regulations, serve to preclude or reduce significant impacts to a degree, but cannot guarantee that all future project level impacts will be avoided or mitigated to a level less than significant. Therefore, impacts associated with noise incompatibilities are significant at the program level. The General Plan PEIR identifies Mitigation Framework Measures to reduce these program level impacts. Because the degree of impact and applicability, feasibility, and success of these measures cannot be adequately known for each specific project at this program level of analysis, the program level noise impact related to land use incompatibilities remains significant and unavoidable.

3.10.4 Mitigation Framework

Goals, policies, and recommendations enacted by the City combined with the federal state and local regulations described above provide a framework for developing project level noise protection measures for future discretionary projects. The City's process for the evaluation of discretionary projects includes environmental review and documentation pursuant to CEQA as well as an analysis of those projects for consistency with the goals, policies and recommendations of the General Plan.

The City's process for evaluating ministerial projects only involves the use of adopted standards, codes, and regulations and is exempt from CEQA. As part of the City's General Plan implementation program, steps will be taken to amend the applicable standards, codes, and regulations needed to implement the Draft General Plan policies and noise guidelines. However, the existing standards, codes, and regulations have the potential to permit ministerial projects that may not be consistent with the Draft General Plan policies and noise guidelines prior to future amendments and impacts would be considered significant and unavoidable.

In general, implementation of the Draft General Plan policies and noise guidelines would preclude significant noise impacts. Compliance with the standards, codes, and regulations is required of all projects and is not considered to be mitigation. However, it is possible that for certain projects, adherence to the regulations may not adequately attenuate noise, and such projects would require additional measures to avoid or reduce significant noise impacts. These additional measures would be considered mitigation.

For future discretionary projects requiring mitigation (i.e., measures that go beyond what is required by existing regulations), site-specific measures will be identified that reduce significant project-level impacts to less than significant or the project level impact may remain significant and unavoidable where no feasible mitigation exists. Where mitigation is determined to be necessary and feasible, these measures will be included in a Mitigation Monitoring and Reporting Program (MMRP) for the project.

General measures that may be implemented to preclude impacts are summarized below. These measures may be updated, expanded and refined when applied to specific future projects based on project-specific design and changes in existing conditions, and local, state and federal laws. Mitigation Framework Measures include:

-
- Future development projects in areas where the existing or future noise level exceeds or would exceed the “compatible” noise level thresholds as indicated in the Draft General Plan Land Use – Noise Compatibility Guidelines (**Table 3.10-7**) must submit an acoustical study consistent with Acoustical Study Guidelines (Table NE-4 in the Draft General Plan), so that appropriate noise mitigation measures are included in the project design to meet the General Plan noise guidelines.
 - Future projects must be sited and designed in a manner that avoids noise impacts to noise-sensitive land uses (e.g., residences, hospitals, schools, and libraries) and sensitive receptors. Prior to approval of any entitlement for a future project, the City will identify any noise impacts and measures to reduce and avoid such impacts in accordance with the City’s Noise Ordinance and state regulations. This may require preparation of a noise analysis. Typical noise attenuation methods include:
 - ***Reducing the source noise.*** Required measures to reduce noise source could include: structure, site, vehicle, and engine design; engine mufflers; traffic calming and management techniques; quieter machinery, and noise limitations on hours of operation.
 - ***Interrupting the noise path.*** Required measures to interrupt the noise path could include the strategic placement of structures, walls, and berms to minimize noise. Solid barriers and structures large enough to block the line of site between the noise source and receiver are often required. The strategic shape and orientation of buildings can also help shield noise sensitive uses from noise sources.
 - ***Separating the noise source.*** Required measures to separate the noise source could include site planning techniques that incorporate spatial buffers between the noise source and receiver and locating noise compatible uses such as vehicle parking, open space, and commercial uses between the noise source and noise sensitive area.
 - ***Insulating the noise receiver.*** Required measures to insulate the noise receiver include acoustical structures, enclosures or construction techniques to abate excessive noise levels. Required techniques may include sound rated windows, doors, and wall construction materials as well as insulation. **Table 3.10-9** identifies typical attenuation methods that can be used to insulate structures and the potential noise level reduction with the methods.

**Table 3.10-9
Typical Noise Attenuation Methods to Insulate the Noise Receiver**

Noise Level Reduction	Typical Mitigation Methods
	<i>Mitigation 1, 2, and 3</i>
15-20 dBA	1. Air conditioning or mechanical ventilation. 2. Double-paned glass. 3. Solid core doors with weather stripping and seals.
	<i>Mitigation 1, 2, and 3 plus</i>
20-25 dBA	4. Stucco or brick veneer exterior walls or wood siding w/one-half inch thick fiberboard underlayer. 5. Glass portions of windows/doors not to exceed 20 percent. 6. Exterior vents facing noise source shall be baffled.
	<i>Mitigation 1 through 6 plus</i>
25-30 dBA	7. Interior sheetrock of exterior wall attached to studs by resilient channels or double walls. 8. Window assemblies, doors, wall construction materials, and insulation shall have a lab-tested STC rating of 30 or greater.

- Where uses, particularly habitable structures, are planned near noise-generating sources, future projects may be required to use a combination of the following architectural treatments or alternative methods to bring interior noise levels to below 45 dBA or 50 dBA for specified uses as indicated in **Table 3.10-7**:
 - Installation of sound barriers (masonry walls or walls with earth berms) between habitable space and noise sources,
 - Installation of double-paned or similar sound rated windows,
 - Provision of sound insulating exterior walls and roofing systems,
 - Location or design of attic vents to minimize sound propagation into structures,
 - Provision of forced-air ventilation systems,
 - Use of building setbacks to increase distance between noise sources and receivers,
 - Placing noise tolerant land uses such as parking lots, maintenance facilities, and utility areas between noise sources and receptors, or
 - Orienting or clustering buildings to shield outdoor spaces from noise sources.

- Future development projects that are located in an Airport Influence Area must use feasible noise attenuation methods in order to meet acceptable interior noise levels for the use and provide avigation easements consistent with adopted Airport Land Use Compatibility Plans. Prior to approval of any entitlement for a future project, the City will identify any noise impacts and measures to reduce such in accordance with City, [Airport Land Use Commission](#), state, and federal regulations.

- All non-emergency construction activity for future projects must comply with the limits (maximum noise levels, hours and days of activity) established in State and City noise regulations (Title 24 California Code of Regulations, San Diego Development Code and Chapter 5, Article 9.5 of the Municipal Code). Proposed industrial or commercial projects located near residential areas must demonstrate that the project, when constructed, will meet City noise reduction requirements.

3.10.5 Significance of Impact with Mitigation Framework

Noise impacts will remain significant and unavoidable at the program level.

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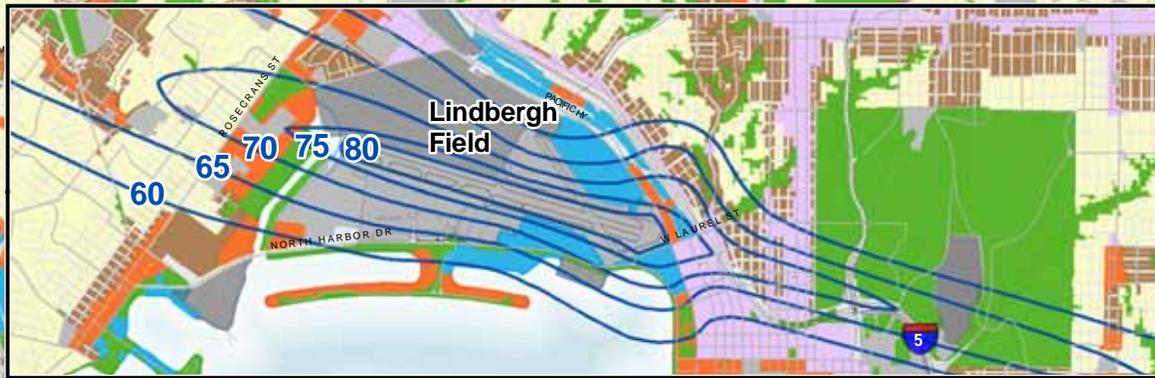
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Generalized Planned Land Use

* Based on Adopted Community Plan Land Use

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- Multiple Use
- Industrial Employment
- Institutional & Public and Semi-Public Facilities
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Figure 3.10-2 San Diego International Airport- Lindbergh Field and NAS North Island Existing Airport Noise Contours with Generalized Planned Land Use

Community Noise Equivalent Level (CNEL) Contours (2005)*

*Note: Existing Noise Contours for Lindbergh Field are based on annual flight operations for 2005.

Source: San Diego County Regional Airport Authority, 2005.
Source: NAS North Island Air Installation Compatible Use Zones Study (1984)

For illustration purposes, the projected noise contours from the 1984 NAS North Island AICUZ Study are used for both the existing and projected noise contours. The Navy is in the process of updating the AICUZ Study and noise contours for NAS North Island.





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Vicinity Map

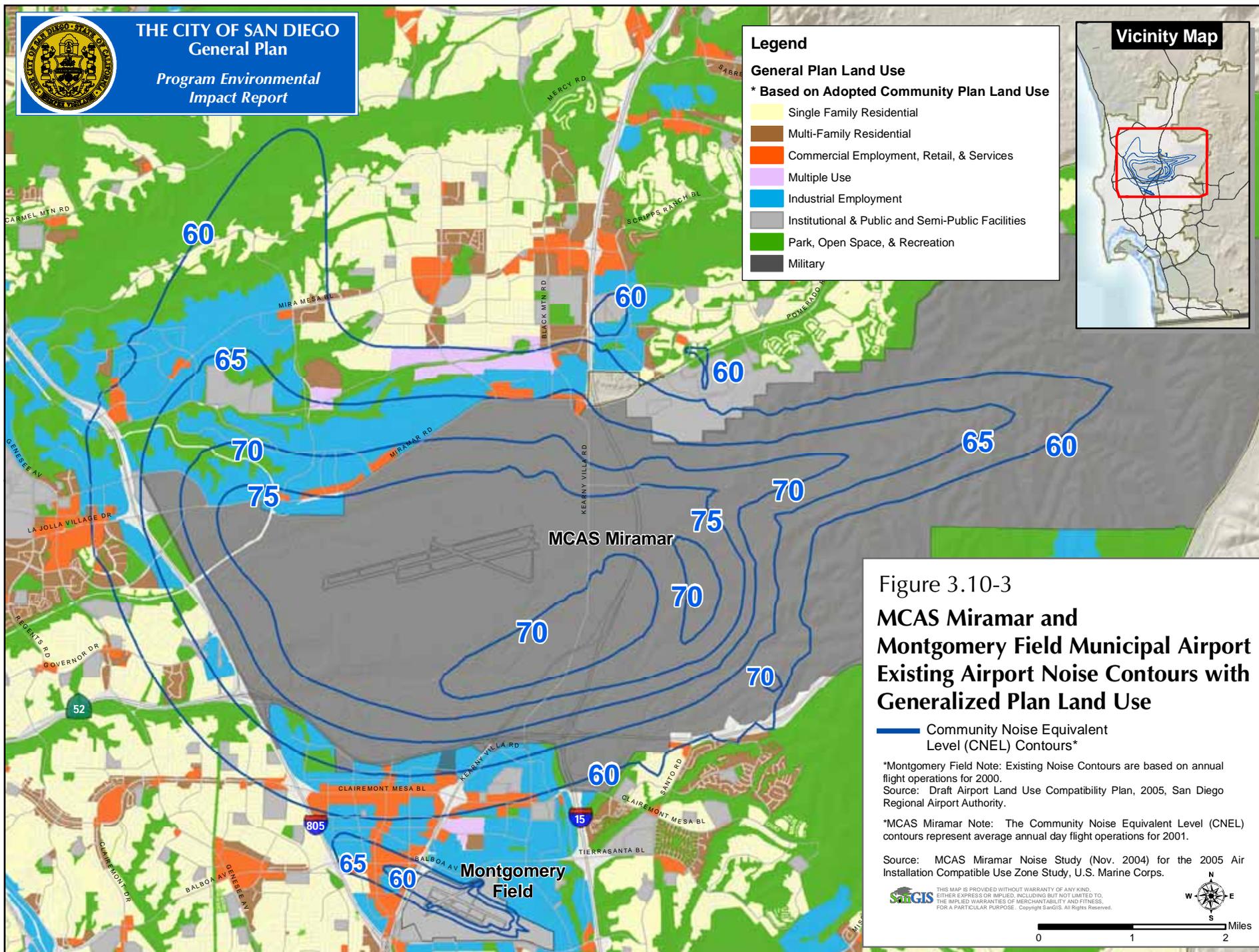
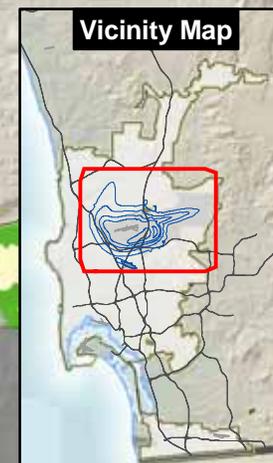


Figure 3.10-3
MCAS Miramar and
Montgomery Field Municipal Airport
Existing Airport Noise Contours with
Generalized Plan Land Use

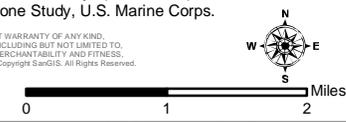
Community Noise Equivalent Level (CNEL) Contours*

*Montgomery Field Note: Existing Noise Contours are based on annual flight operations for 2000.
 Source: Draft Airport Land Use Compatibility Plan, 2005, San Diego Regional Airport Authority.

*MCAS Miramar Note: The Community Noise Equivalent Level (CNEL) contours represent average annual day flight operations for 2001.

Source: MCAS Miramar Noise Study (Nov. 2004) for the 2005 Air Installation Compatible Use Zone Study, U.S. Marine Corps.

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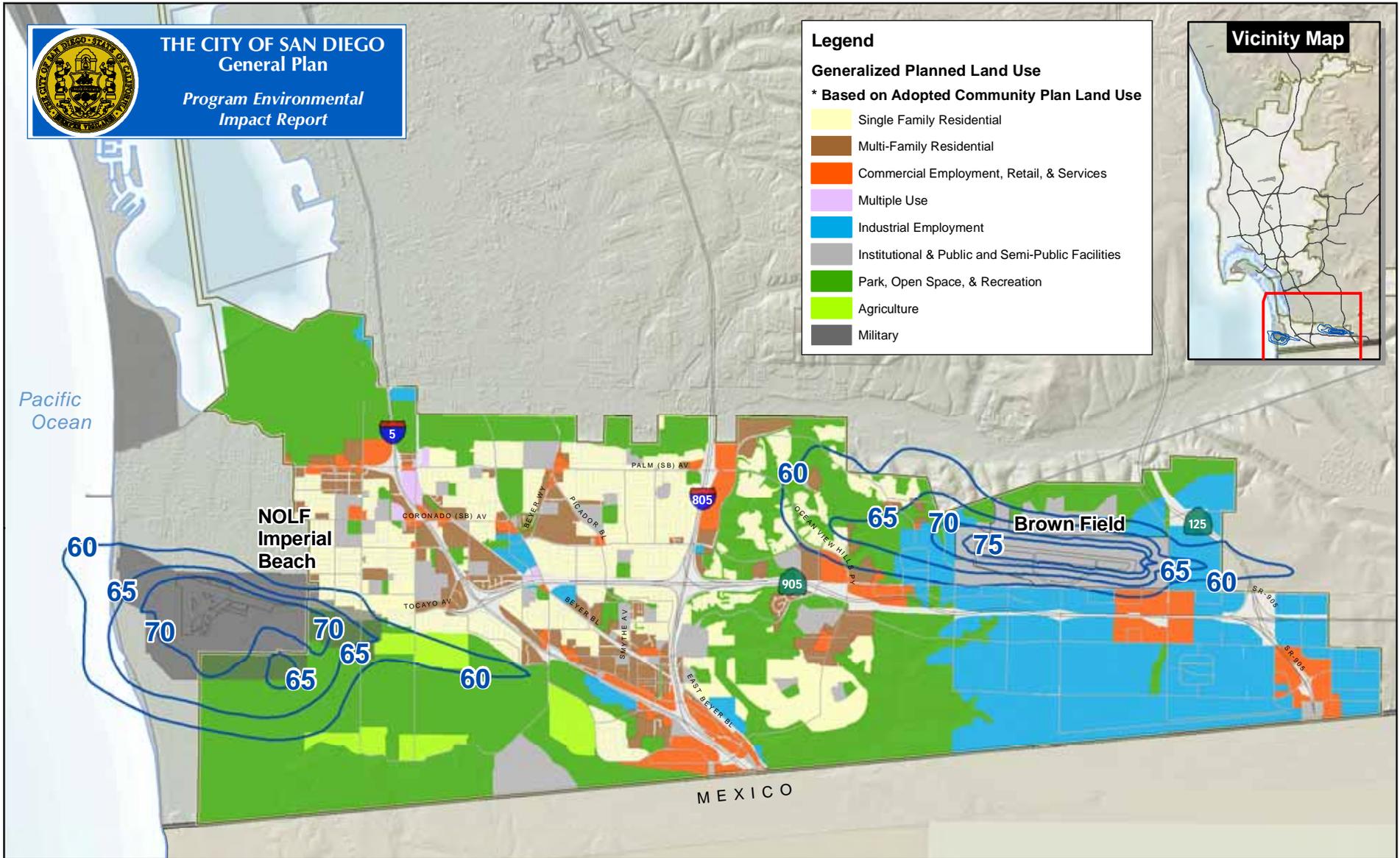
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**Figure 3.10-4
Brown Field Municipal Airport and
Naval Outlying Field Imperial Beach
Existing Airport Noise Contours with
Generalized Planned Land Use**

Community Noise Equivalent Level (CNEL) Contours*

NOLF IB Note:

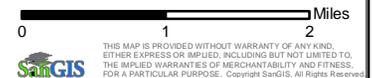
The maximum mission scenario noise contours from the 1989 Air Installation Compatible Use Zone (AICUZ) Study are shown. The U.S. Navy is in the process of preparing existing and updated maximum mission noise contours, and are not yet available.

For illustration purposes, the projected noise contours from the 1989 Imperial Beach AICUZ Study are used for both the existing and projected noise contours. The Navy is in the process of updating the AICUZ Study and noise contours for NOLF Imperial Beach.

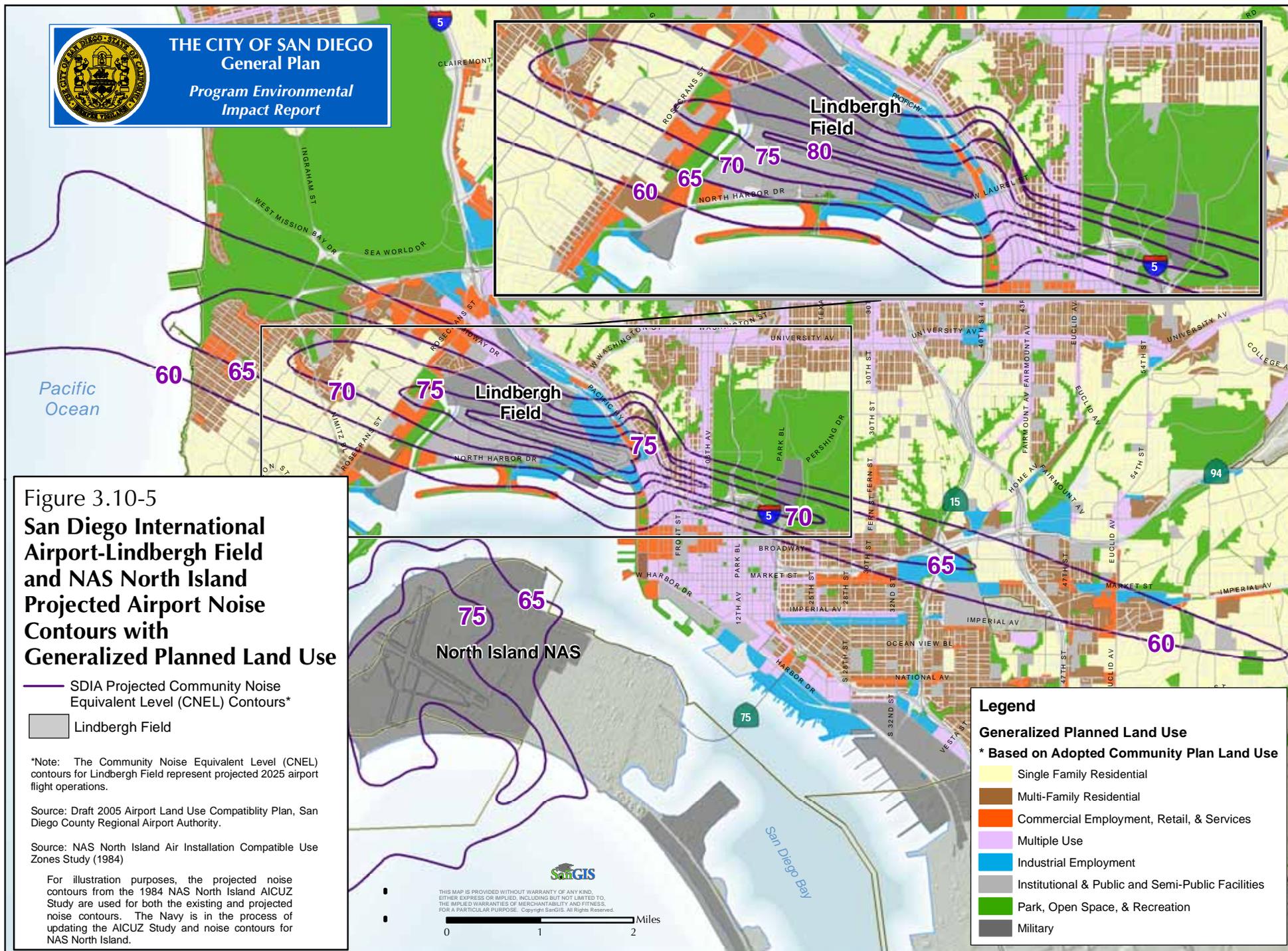
Brown Field Note:

Existing Noise Contours are based on annual flight operations for 2004.

Source: Draft Airport Land Use Compatibility Plan, 2005,
San Diego Regional Airport Authority.



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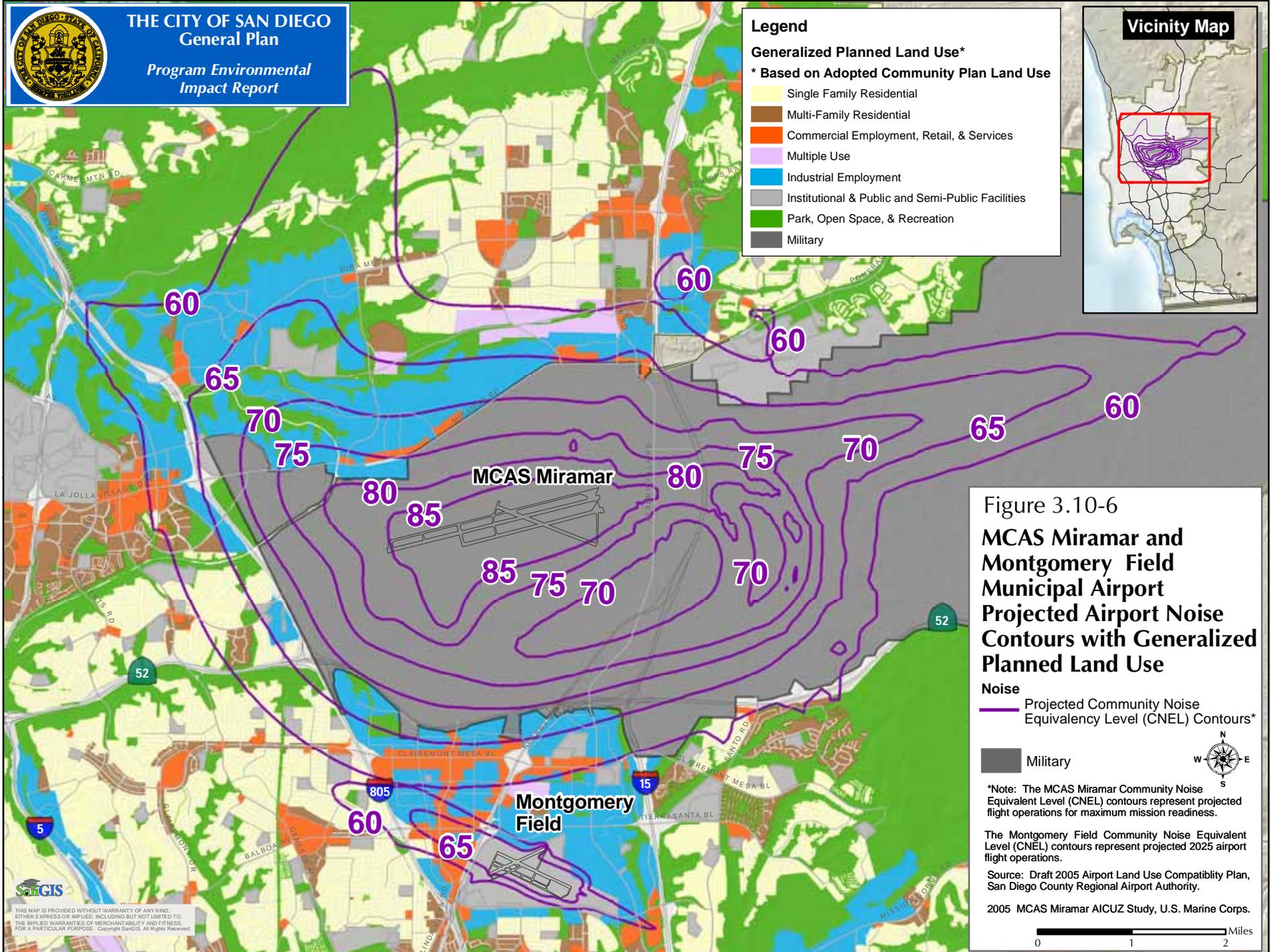
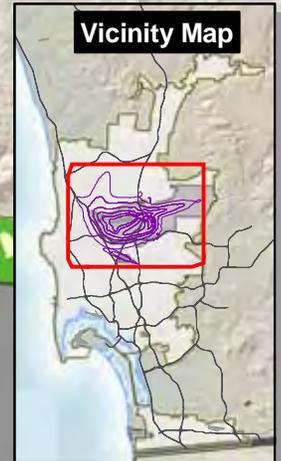
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Vicinity Map



**Figure 3.10-6
MCAS Miramar and
Montgomery Field
Municipal Airport
Projected Airport Noise
Contours with Generalized
Planned Land Use**

Noise
 Projected Community Noise
 Equivalency Level (CNEL) Contours*

Military



*Note: The MCAS Miramar Community Noise
 Equivalent Level (CNEL) contours represent projected
 flight operations for maximum mission readiness.

The Montgomery Field Community Noise Equivalent
 Level (CNEL) contours represent projected 2025 airport
 flight operations.

Source: Draft 2005 Airport Land Use Compatibility Plan,
 San Diego County Regional Airport Authority.

2005 MCAS Miramar AICUZ Study, U.S. Marine Corps.



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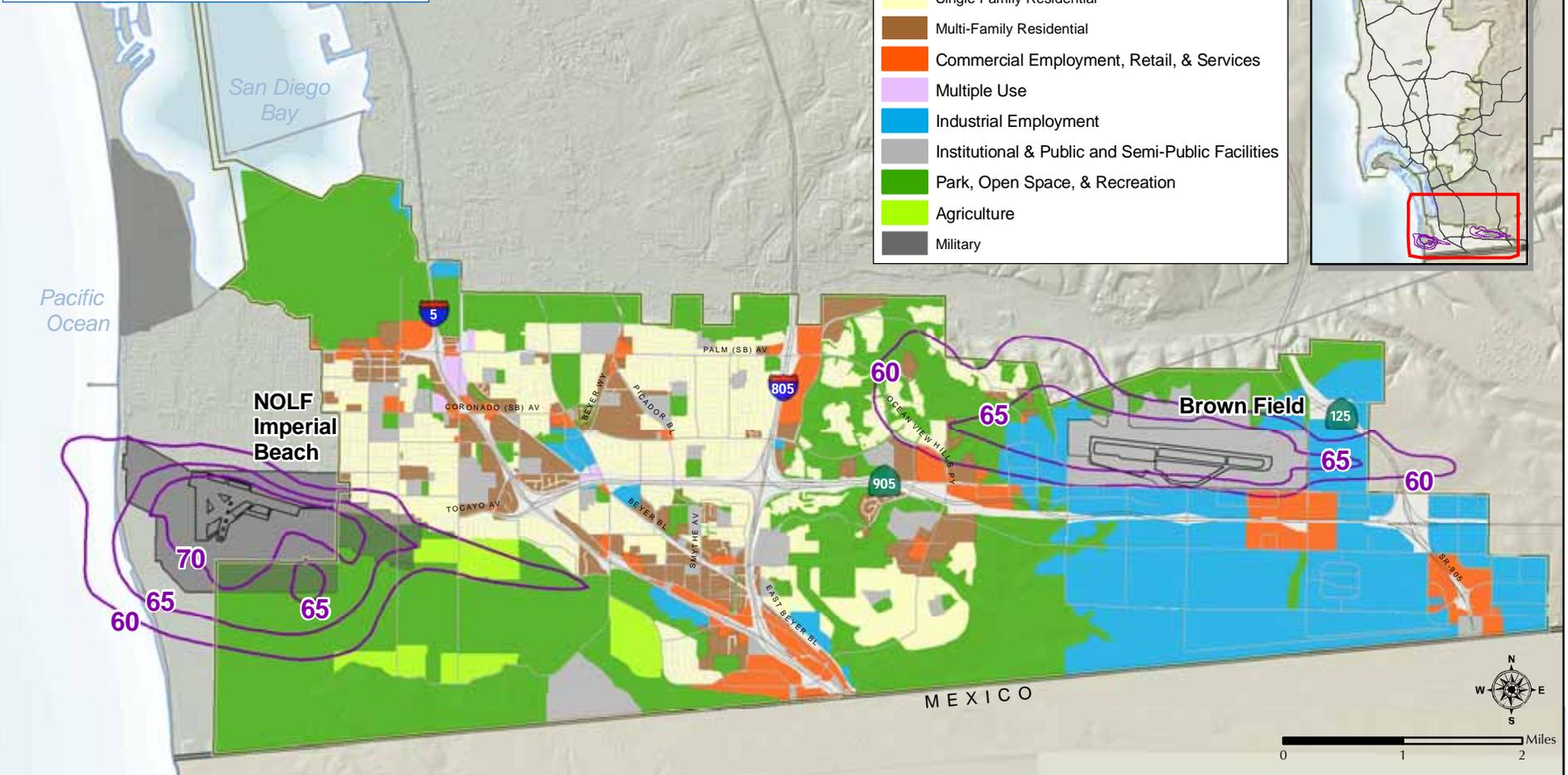


Figure 3.10-7
**Brown Field Municipal Airport and Naval
 Outlying Field Imperial Beach Projected Airport Noise Contours
 with Generalized Planned Land Use**

*Note: The Imperial Beach NOLF Community Noise Equivalent Level (CNEL) contours represent projected flight operations for maximum mission readiness.

For illustration purposes, the projected noise contours from the 1989 Imperial Beach AICUZ Study are used for both the existing and projected noise contours. The Navy is in the process of updating the AICUZ Study and noise contours for NOLF Imperial Beach.

The Brown Field Community Noise Equivalent Level (CNEL) contours represent projected 2025 airport flight operations.

Draft 2005 Airport Land Use Compatibility Plan, San Diego County Regional Airport Authority.

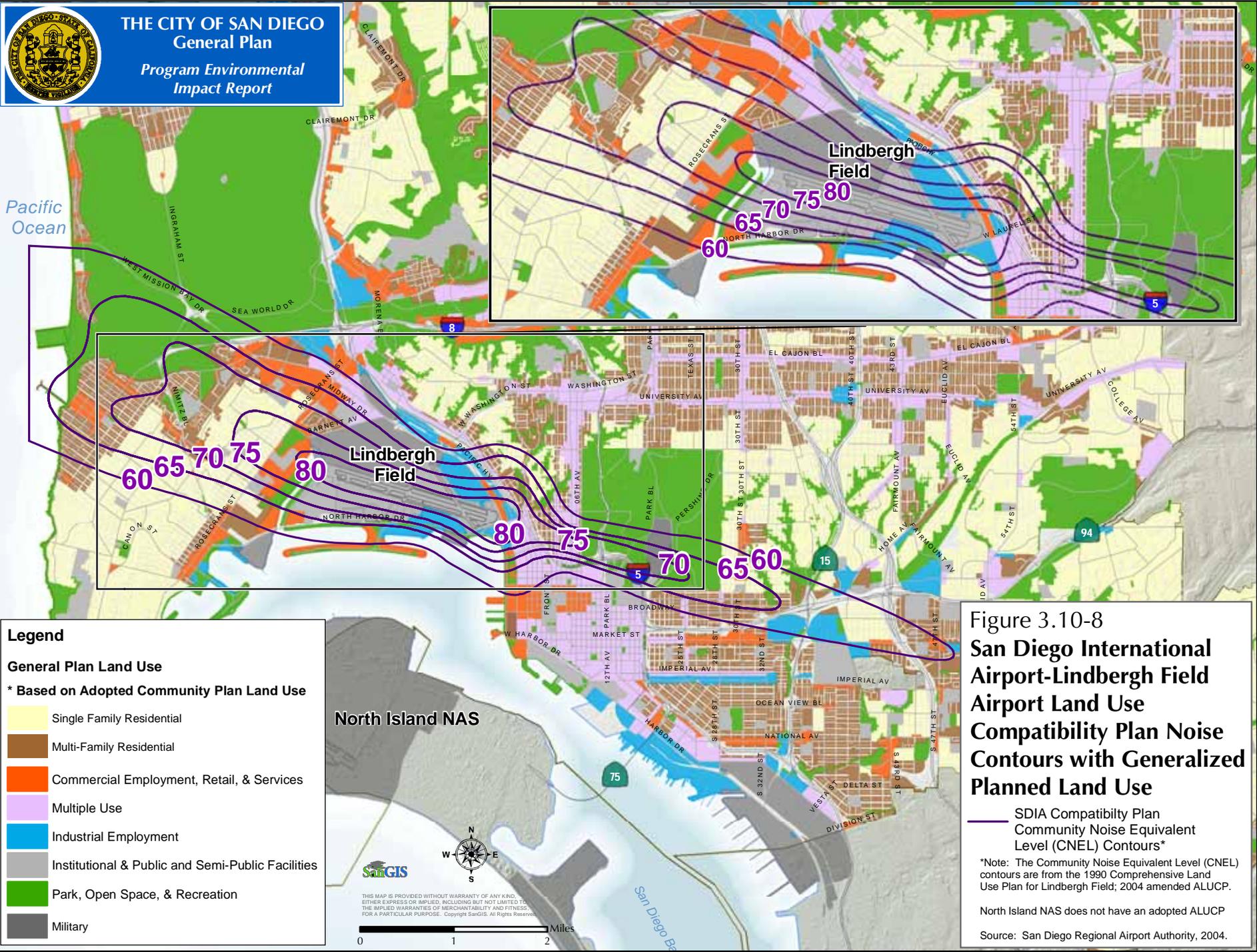


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- Military

Figure 3.10-8
San Diego International
Airport-Lindbergh Field
Airport Land Use
Compatibility Plan Noise
Contours with Generalized
Planned Land Use

— SDIA Compatibility Plan
 — Community Noise Equivalent
 Level (CNEL) Contours*

*Note: The Community Noise Equivalent Level (CNEL) contours are from the 1990 Comprehensive Land Use Plan for Lindbergh Field; 2004 amended ALUCP.

North Island NAS does not have an adopted ALUCP

Source: San Diego Regional Airport Authority, 2004.





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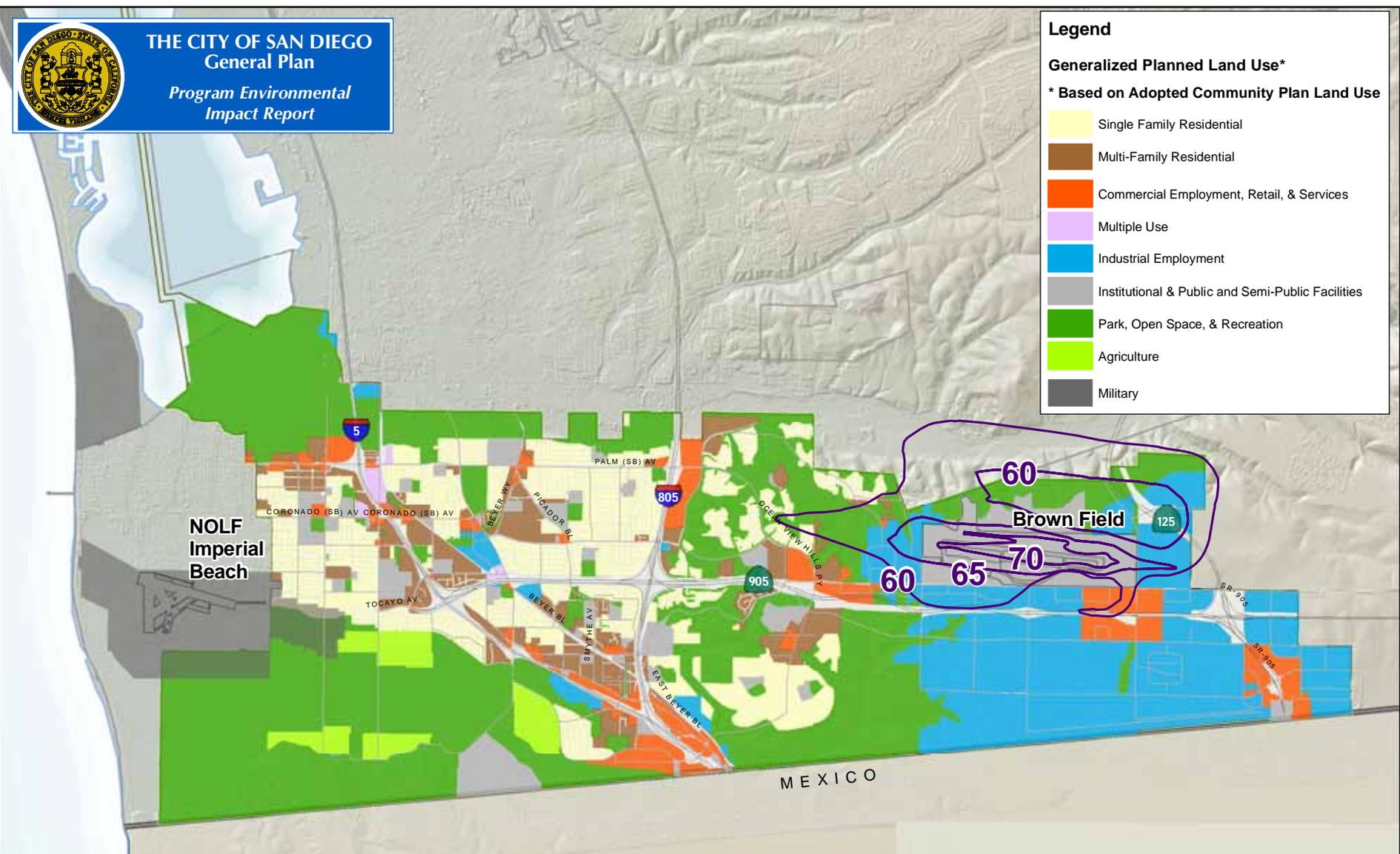


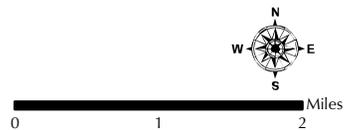
Figure 3.10-9
**Brown Field Municipal Airport
 Land Use Compatibility Plan Noise Contours
 with Generalized Planned Land Use**

— Brown Field Compatibility Plan
 Community Noise Equivalent Level (CNEL) Contours*

*Note: The Community Noise Equivalent Level (CNEL) contours are from the 1981 Comprehensive Land Use Plan for Brown Field; 2004 amended ALUCP.

Naval Outlying Field Imperial Beach does not have an adopted ALUCP.

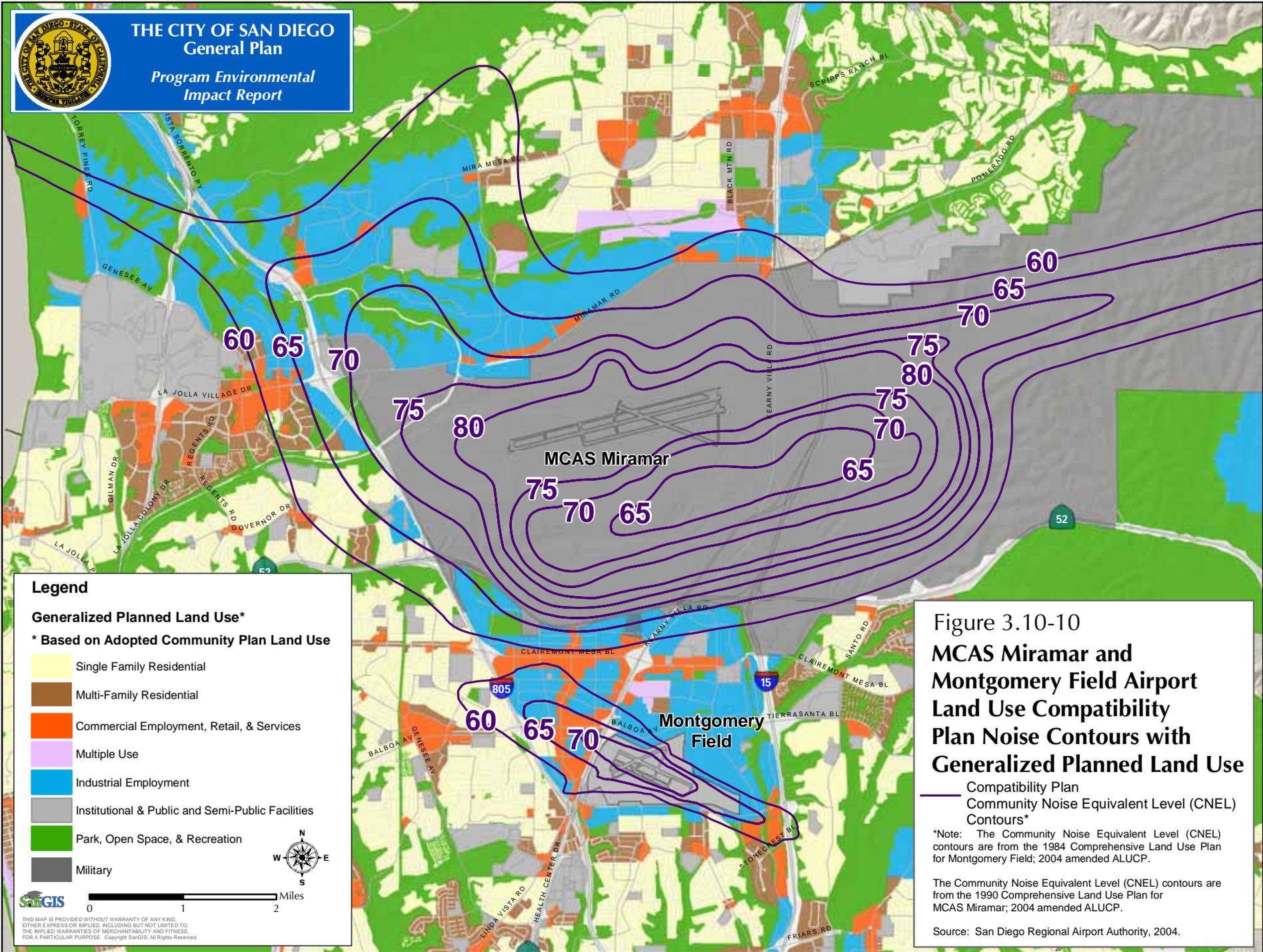
Source: San Diego Regional Airport Authority, 2004.



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- Military



0 1 2 Miles



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Figure 3.10-10
MCAS Miramar and
Montgomery Field Airport
Land Use Compatibility
Plan Noise Contours with
Generalized Planned Land Use

— Compatibility Plan
 — Community Noise Equivalent Level (CNEL) Contours*

*Note: The Community Noise Equivalent Level (CNEL) contours are from the 1984 Comprehensive Land Use Plan for Montgomery Field; 2004 amended ALUCP.

The Community Noise Equivalent Level (CNEL) contours are from the 1990 Comprehensive Land Use Plan for MCAS Miramar; 2004 amended ALUCP.

Source: San Diego Regional Airport Authority, 2004.

3.11 PALEONTOLOGICAL RESOURCES

3.11.1 Existing Conditions

Paleontological resources (fossils) are the remains and/or traces of prehistoric plant and animal life exclusive of human remains or artifacts. Fossil remains such as bones, teeth, shells, and wood are found in the geologic deposits (rock formations) in which they were originally buried. Paleontological resources represent a limited, non-renewable, sensitive scientific and educational resource.

The potential for fossil remains at a location can be predicted through previous correlations that have been established between the fossil occurrence and the geologic formations within which they are buried. For this reason, knowledge of the geology of a particular area and the paleontological resource sensitivity of particular rock formations, make it possible to predict where fossils will or will not be encountered.

Within San Diego County there are a number of distinct geologic rock units (i.e. formations) that record portions of the past 450 million years of earth history. However, the record is most complete for only the past 75 million years.

The City of San Diego is in the Coastal Plain Province, and contains several rock formations. This province is underlain by a sequence of marine and non-marine sedimentary rock units that record portions of the last 140 million years of earth history. Over this period of time, the relationship of land and sea has fluctuated drastically, such that today we have ancient marine rocks preserved up to elevations about 900 feet above sea level. Each of the geologic formations found in the City is summarized below. More detailed information about each of the formations is found in Deméré and Walsh (1994).

Late Quaternary Alluvium

The sediments at the bottom of stream beds of the later Quaternary alluvium are generally younger than 10,000 years old. Fossils are usually not found in these deposits in the Coastal Plain Province. However, there is one notable exception in San Diego. Teeth and limb bones of a mammoth were found in floodplain deposits of the Tijuana River Valley. The floors of Otay Valley, Mission Valley, Rose Canyon, Sorrento Valley, and San Dieguito Valley are the sites where later Quaternary alluvial deposits are found. Because of their young age, they are assigned low paleontological resource sensitivity.

Unnamed River Terrace Deposits

Deposits of coarse-grained, gravelly sandstones, pebble and cobble conglomerates, and claystones occur along the edge of many of the larger coastal valleys. These deposits generally occur at levels above the active stream channels and represent the sediments of ancient river courses. These river terrace deposits are anywhere from 10,000 to 500,000 years old. Fossils of “Ice Age” mammals have been collected from the South Bay Freeway, such as ground sloth,

mammoth, wolf, camel, and mastodon. The San Dieguito Valley yielded well-preserved ground sloth. All of these important sites have been discovered in construction-related excavations. The “unnamed river terrace deposits” occur along the margins of the larger coastal river valleys, like Otay Valley, Mission Valley, and San Dieguito Valley. Moderate resource sensitivity is assigned to this formation in South Eastern, Chollas Valley, Fairbanks Ranch, Skyline, Paradise Hills, Otay Mesa, Nestor, and San Ysidro communities and a low resource sensitivity is assigned to this formation in all other areas of the City.

Unnamed Marine Terrace Deposits

The Coastal Plain Province is characterized by a “stair step” sequence of elevated marine terraces, which are uplifted sea floors, and their associated marine and non-marine sedimentary covers. The lower marine terraces are referred to as “unnamed marine terrace deposits” that are about 80,000 to 180,000 years old. A large variety of marine vertebrate and invertebrate fossils have been found in these terraces. The “unnamed marine terrace deposits” occur locally along the entire coast of San Diego, and are given a high resource sensitivity.

Bay Point Formation

The Bay Point Formation is a near shore marine sedimentary deposit that is about 220,000 years old. This formation has produced a large and diverse amount of well-preserved marine invertebrate and vertebrate fossils. The Bay Point Formation is exposed along the northern shore of Mission Bay (i.e. Crown Point), along the San Diego waterfront, and throughout the city of Coronado. It is assigned high resource sensitivity.

Lindavista Formation

This formation represents a marine and/or non-marine terrace deposit. These deposits accumulated on the sea floor during a period of dropping sea levels. Today, these deposits form the extensive mesa surfaces characteristic of the Otay Mesa, San Diego Mesa, Linda Vista Mesa, Kearny Mesa, and Mira Mesa areas. Fossils are rare in the Lindavista Formation and have only been recorded in a few areas. The formation occurs over a large portion of San Diego coast, and is assigned high resource sensitivity in Mira Mesa and Tierrasanta and a moderate resource sensitivity in all other areas of the City.

San Diego Formation

The San Diego Formation is exposed extensively from Otay Mesa and Otay Ranch to Mission Valley, with isolated occurrences stretched out along the Rose Canyon Fault Zone at Tecolote Canyon, Balboa Avenue, Rose Canyon, and all along the southern slopes of Mount Soledad from Interstate-5 (I-5) to the sea cliffs at Pacific Beach. The San Diego Formation is a marine sedimentary deposit. The formation has rich fossil beds that have yielded extremely diverse assemblages of marine organisms. In addition, rare remains of terrestrial mammals and fossil wood and leaves have been recovered here. This diverse group of fossils represents one of the most important sources in the world of information on Pliocene marine organisms and environments, and is given high paleontological resource sensitivity.

Otay Formation

The Otay Formation is a fluvial sedimentary rock unit. Numerous fossil localities have been discovered in the upper portion of the formation. Well-preserved remains of a diverse assemblage of terrestrial vertebrates were found here. Based on recent discoveries, the Otay Formation is now considered to be the richest source of late Oligocene terrestrial vertebrates in California. This formation is exposed throughout, from approximately the latitude of State Route-94 (SR-94) south to the International Border and from Interstate-805 (I-805) east to the base of the San Ysidro Mountains and San Miguel Mountain. Part of the formation is exposed extensively in the area around Lower Otay Lake, as well as in patches along the north side of the San Ysidro Mountains as far east as Sycamore Canyon. The Otay Formation is assigned a high paleontological resource sensitivity, because of its important fossils.

Sweetwater Formation

The Sweetwater Formation is a non-marine rock unit. This formation was deposited in a river channel setting, and some exposures of the formation may represent ancient soils. Fossils were collected from the lower part of the formation, which consisted of dental remains of opossums, insectivores, and rodents. Only a few non-diagnostic mammal teeth are known from the upper portion. The Sweetwater Formation crops out from Otay Valley northward and eastward to at least Encanto and Casa de Oro. Good exposures occur around Lower Otay Lake, at the confluence of Wolf Canyon and Otay Valley, and in the area of the confluence of Long Canyon and Sweetwater Valley. Sweetwater Formation is assigned a high paleontological resource sensitivity.

Mission Valley Formation

This formation is the only Eocene rock unit in southern California to have a radiometric date directly associated with fossil mammal localities. The marine strata of the Mission Valley Formation have produced abundant and generally well-preserved remains of marine microfossils, macroinvertebrates, and vertebrates. Fluvial strata of the formation have produced well-preserved examples of petrified wood and fairly large and diverse assemblages of fossil land mammals. The fact that marine microfossils and land mammals occurred at the same time is extremely important, as it allows for the direct correlation of terrestrial and marine faunal time scales. The formation crops out discontinuously from Otay Valley in the south to at least Miramar Reservoir in the north, and from Old Town in the west to Spring Valley, El Cajun Valley, and Santee in the east. The Mission Valley Formation represents one of the few instances in North America where such comparisons are possible, and they are assigned high paleontological resource sensitivity.

Stadium Conglomerate

The Stadium Conglomerate is made up of two conglomeratic units that are distinct both with regard to the time period of formation and to the composition of the formation. The two units occur together in some places, but only one may be present in other areas. The formation occurs in Mission Valley and Murphy Canyon, Tierrasanta, Rancho Peñasquitos, and Rancho Bernardo areas. Where it occurs in Murphy Canyon, there have been sparse, but well-preserved remains of

rhinoceros, primates and small mammals. Where it occurs in Scripps Ranch, Rancho Peñasquitos, and Carmel Mountain Ranch, there have been recovered well-preserved remains of rodents, bats, tapirs and primates. Because of the diverse and well-preserved remains found in this formation, it has been assigned a high resource sensitivity.

Friars Formation

The Friars Formation consists mainly of sandstones, siltstone, mudstones, and cobble conglomerate. It is rich in vertebrate fossils, especially terrestrial mammals such as primates, rodents, artiodactyls, and perissodactyls. Well-preserved remains of marine microfossils and macroinvertebrates, and remains of fossil leaves have been recovered from the Friars Formation. The formation crops out from Mission Valley north to Rancho Bernardo in the east and Rancho Santa Fe in the west. In the south, the formation extends from Tecolote Canyon east to Santee and Lakeside. This formation is given high paleontological resource sensitivity.

Scripps Formation

The Scripps Formation is considered to be potentially fossiliferous almost everywhere it occurs. Most of the fossils known from this formation consist of remains of marine organisms (i.e. bony fishes, sharks, rays, etc.) and land mammals (i.e. uinthere, brontothere, rhinoceros, and artiodactyl). Well-preserved pieces of fossil wood have also been recovered from the Scripps Formation. This formation crops out from Presidio Park in the south, north to Del Mar, and from Clairemont east to La Jolla Valley. Based on the joint occurrence of marine invertebrate fossils and terrestrial vertebrates, the formation is assigned high resource sensitivity.

Ardath Shale

The Ardath Shale has yielded diverse and well-preserved assemblages of marine microfossils, macroinvertebrates, and vertebrates. This formation crops out from Soledad Valley in the north to La Jolla, Pacific Beach, and Clairemont in the south. Because of its production of diverse and well-preserved assemblages of fossils, high resource sensitivity is given to this formation.

Torrey Sandstone

The Torrey Sandstone has produced important remains of fossil plants and marine invertebrates. Many of the plant remains are from taxa related to species that today live in brackish-water marsh and/or riparian woodland environments in subtropical and tropical regions of Southeast Asia and the southeastern U.S. Their occurrence in the Torrey Sandstone suggests that the Eocene climate in this area was warmer and wetter than the modern climate. The formation occurs from Sorrento Valley in the south to Batiquitos Lagoon in the north, and from the coast inland to La Jolla Valley. This formation has a high resource sensitivity in Black Mountain Ranch and Carmel Valley and a low paleontological resource sensitivity rank in all other areas of the City.

Delmar Formation

Fossils from this formation consist of well-preserved to poorly preserved remains of estuarine invertebrates, and estuarine vertebrates. The Delmar Formation crops out from Sorrento Valley in the south to at least Batiquitos Lagoon in the north. The best exposures of the formation occur in the sea cliffs from Torrey Pines State Reserve to Encinitas. The Delmar Formation has produced important remains of terrestrial vertebrate fossils and is assigned high paleontological resource sensitivity.

Mount Soledad Formation

The Mount Soledad Formation has yielded fossils of various kinds of marine organisms including molluscs, planktonic foraminifers, benthonic foraminifers and pollen. This formation has a rather limited areal distribution, and is exposed in road cuts on the western and eastern sides of Rose Canyon. It is also exposed in the sea cliffs at Tourmaline Beach, in artificial slopes at the north end of Point Loma, and in canyon slopes of Mount Soledad. Although the extent of known fossil occurrences is limited, its sedimentary nature suggests greater potential. This formation is given moderate resource sensitivity in all areas except in the Rose Canyon area between Mission Bay south of SR-52 where it is given a high resource sensitivity.

Pomerado Conglomerate

The lower portion of the Pomerado Conglomerate has produced remains of fossil terrestrial mammals including primates, protoreodonts, and insectivores. The middle part of the conglomerate has yielded remains of near shore marine molluscs, as well as unidentifiable mammal bone fragments. The upper conglomerate member has yielded a single fragmentary jaw of an unidentified artiodactyl. The Pomerado Conglomerate crops out from La Mesa to the south to at least Miramar Reservoir in the north, and from there eastward to Santee. The Pomerado Conglomerate is assigned high paleontological resource sensitivity in Scripps Ranch and Tierrasanta, and moderate sensitivity in all other areas of the City.

Cabrillo Formation

The Cabrillo Formation is composed mainly of sandstones and conglomerates, and is approximately 70 million years old. Fossils from this formation are not well known and consist of remains of marine invertebrates and vertebrates. The Cabrillo Formation crops out along the eastern and southwestern sides of the Point Loma peninsula in both sea cliff exposures and road cuts. It is also exposed on the western, northern, and eastern flanks of Mount Soledad. Based on the unproven resource potential of the formation, a moderate paleontological sensitivity is given.

Point Loma Formation

The Point Loma Formation was deposited on an ancient sea floor. Well-preserved remains of many types of fossil marine invertebrates and vertebrates are known from this formation. In addition, the formation has also produced sparse remains of terrestrial plants and dinosaurs. Taken together, the paleontological resources of the Point Loma Formation represent some of the best preserved examples of late Cretaceous marine fossils known from California and one of the few sources of dinosaur fossils in the state. The formation is well exposed along the western

margin of Point Loma and along the northern flank of Mount Soledad. The Point Loma Formation has produced diverse and well-preserved assemblages of marine invertebrate fossils, as well as rare dinosaur remains, and is assigned a high paleontological sensitivity.

Lusardi Formation

No identifiable fossils have been recovered from the Lusardi Formation in San Diego. The Cretaceous age of this rock unit coupled with its terrestrial depositional setting suggest the potential presence of dinosaurs and other terrestrial vertebrates. The Lusardi Formation is exposed in Lusardi Canyon and La Zanja Canyon near Rancho Santa Fe, along Poway Road east of Poway, in the Alpine area, near San Vicente Reservoir, and east of Palomar Airport in Carlsbad. This formation is assigned a high resource sensitivity in Black Mountain Ranch, Lusardi Canyon Poway, and Rancho Santa Fe and moderate resource sensitivity in all other areas of the City.

Table 3.11-1 provides a summary of the paleontological sensitivity (i.e., the potential for paleontological resources to occur) of all geological units within the City of San Diego with more specific reference to the sensitivity of each geologic unit within certain communities (from City of San Diego 2002).

Santiago Peak Volcanics

The Santiago Peak Volcanics are comprised of Metasedimentary and Metavolcanic formations. Only the Metasedimentary formation has the potential to contain fossil remains. These formations can be found in Black Mountain Ranch, La Jolla Valley, Fairbanks Ranch, Mira Mesa, and Rancho Peñasquitos. Santiago Peak Volcanics found in these areas are assigned moderate resource sensitivity. The Metavolcanic formations found in all other areas of the City have no potential to contain fossil remains and are assigned a zero resource sensitivity.

Granite/Plutonic

Granitic/Plutonic formations have no potential to contain fossil remains and are assigned a zero resource sensitivity throughout the City.

Table 3.11-1 Geologic Formations and Paleontological Resource Potential		
Geologic Unit	Potential Fossil Localities	Sensitivity Rating
Alluvium	All communities where this unit occurs	Low
Ardath Shale	All communities where this unit occurs	High
Bay Point/Marine Terrace	All communities where this unit occurs	High
Cabrillo Formation	All communities where this unit occurs	Moderate
Delmar Formation	All communities where this unit occurs	High
Friars Formation	All communities where this unit occurs	High
Granitic/Plutonic	All communities where this unit occurs	Zero
Lindavista Formation	A. Mira Mesa / Tierrasanta	A. High

Geologic Unit	Potential Fossil Localities	Sensitivity Rating
	B. All other areas	B. Moderate
Lusardi Formation	A. Black Mountain Ranch/Lusardi Canyon Poway/Rancho Santa Fe B. All other areas	A. High B. Moderate
Mission Valley Formation	All communities where this unit occurs	High
Mt. Soledad Formation	A. Rose Canyon B. All other areas	A. High B. Moderate
Otay Formation	All communities where this unit occurs	High
Point Loma Formation	All communities where this unit occurs	High
Pomerado Conglomerate	A. Scripps Ranch/Tierrasanta B. All other areas	A. High B. Moderate
River/Stream Terrace Deposits	A. South Eastern/Chollas Valley/Fairbanks Ranch Skyline/Paradise Hills/Otay Mesa Nestor/San Ysidro B. All other areas	A. Moderate B. Low
San Diego Formation	All communities where this unit occurs	High
Santiago Peak Volcanics A. Metasedimentary B. Metavolcanic	A. Black Mountain Ranch/La Jolla Valley; Fairbanks Ranch/Mira Mesa/Peñasquitos B. All other areas	A. Moderate B. Zero
Scripps Formation	All communities where this unit occurs	High
Stadium Conglomerate	All communities where this unit occurs	High
Sweetwater Formation	All communities where this unit occurs	High
Torrey Sandstone	A. Black Mountain Ranch/Carmel Valley B. All other areas	A. High B. Low

3.11.2 Thresholds of Significance

A significant impact could occur if implementation of the General Plan:

- Allows development to occur that could significantly impact a unique paleontological resource or a geologic formation possessing a medium to high fossil bearing potential.

3.11.3 Impact Analysis

Could implementation of the proposed General Plan allow development to occur that could significantly impact a unique paleontological resource or a geologic formation possessing a medium to high fossil bearing potential?

Many fossil sites presently on record in San Diego have been discovered during construction operations. Weathering quickly destroys most surface fossil materials, and it is not until fresh, unweathered exposures are made by grading that well-preserved fossils can be recovered. Impacts to paleontological resources occur when excavation activities cut into fossiliferous geological deposits, and cause physical destruction of fossil remains. Fossil remains, fossil sites, fossil-producing geologic formations, and geologic formations that have the potential for containing fossil remains are all considered paleontological resources or have the potential to be

paleontological resources. Fossil remains are considered important if they are: 1) well preserved; 2) identifiable; 3) type/topotypic specimens; 4) age diagnostic; 5) useful in environmental reconstruction; and/or 6) represent new, rare, and/or endemic taxa (City of San Diego 2002).

The determination of whether or not a project has the potential to impact paleontological resources is based on the sensitivity of the geologic unit and the amount of grading proposed for that project. In this case, the proposed project is the City's General Plan and specific grading is not proposed at any location. However, it can be assumed that future projects developed consistent with the goals and policies of the General Plan have the potential to result in grading within sensitive geologic units. The Draft General Plan does not include specific policies for the protection of paleontological resources. Likewise, the current land development regulations provide no protection for paleontological resources. These resources are identified and protected through the environmental review process for discretionary projects. Once a proposed project is subject to environmental review, the initial study would identify whether or not it is likely that fossils are present on the site.

For those formations with a high sensitivity rating, a significant impact may occur if grading exceeds 1,000 cubic yards and is ten or more feet deep (the volume count starts at the surface). For moderately sensitive formations, the threshold is 2,000 cubic yards and 10 feet of depth. A potential for significant impact should always be identified when grading any amount of material on or near a known fossil recovery site as indicated on published maps (Kennedy and Peterson 1975; Kennedy and Tan 1977). There is no potential for impact when grading in fill material.

Some areas within the City have been graded and/or filled and recompacted as part of parcel or subdivision maps or other previous projects. If an area was previously graded, the bedrock formation will be closer to the surface, so even shallow excavations, such as building footings, may extend into formations. Conversely, if an area has been filled during past construction activities (such as a canyon), even deep excavations may not reach the formation (City of San Diego 2002).

Finally, several community plans identify preservation of paleontological resources as an environmental goal for the community. Since implementation of the Draft General Plan could result in the loss of these resources, there could be significant land use impacts related to conflicts with environmental goals and policies. (See also **Section 3.8** – Land Use.)

The proposed project does not provide for detection, investigation, collection or preservation of paleontological resources. For activities not subject to environmental review, the presence of fossil resources would not be detected. Therefore, the proposed project would have a significant impact on paleontological resources. Although mitigation measures would reduce impacts, it is infeasible at this Program Environmental Impact Report (Program EIR) level to provide more specific mitigation that would reduce impacts to a less than significant level, since specific development projects are not known. Thus, potential impacts related to paleontological resources are considered significant and unavoidable.

3.11.4 Mitigation Framework

Even if alternative language in the form of policies directed at preserving important fossil remains were included in the General Plan, there is currently no regulatory scheme to implement those policies for ministerial projects. However, monitoring for paleontological resources

required during construction activities would be implemented at the project level and would provide mitigation for the loss of important fossil remains with future discretionary projects that are subject to environmental review.

The steps currently taken to identify and mitigate significant impacts to paleontological resources, as part of the discretionary review of development projects, are provided below (from City of San Diego 2007).

I. Prior to Permit Issuance

A. Environmental Review Manager (ERM) Plan Check.

1. Prior to Notice to Proceed (NTP) for any construction permits, including but not limited to, the first Grading Permit, Demolition Plans/Permits and Building Plans/Permits, but prior to the first preconstruction meeting, whichever is applicable, the ERM 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 ERM.

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.**
 2. 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.
 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 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.
- 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 Work

- A. If night work is included in the contract.
 1. When night 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 work, The PI shall record the information on the CSVR and submit to MMC via fax by 9:00 a.m. the following morning, if possible.
 - 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 8:00 a.m. the following morning 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. Submittal of Draft Monitoring Report.
 1. The PI shall submit two copies of the Draft Monitoring Report (even if negative) 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.

3.11.5 Significance of Impact with Mitigation Framework

Although significant impacts to paleontological resources can be mitigated through review and monitoring of discretionary development projects, impacts at the project level for non-discretionary projects would not be mitigated due to a lack of regulatory language in the land development code requiring protection of paleontological resources. Since specific development projects are not known at this time, the impact to paleontological resources is considered significant and unavoidable.

Notes and References

“City of San Diego Paleontological Guidelines (2007)”. Available from the Development Services Department, Environmental Analysis Section located at 1222 First Avenue, San Diego, CA.

“Paleontological Resources, County of San Diego” (Thomas A. Deméré and Stephen L. Walsh, Department of Paleontology, San Diego Natural History Museum, August 1994

“Geology of the San Diego Metropolitan Area, California,” by Michael P. Kennedy and Gary L. Peterson (published in the *California Division of Mines and Geology Bulletin 200*, Sacramento, 1975)

“Geology of National City, Imperial Beach and Otay Mesa Quadrangles, Southern San Diego Metropolitan Area, California,” by Michael P. Kennedy and Siang S. Tan, 1977 (California Division of Mines & Geology).

3.12 POPULATION AND HOUSING

3.12.1 Existing Conditions

In 2004, the City of San Diego had a population of 1,295,147, an increase of approximately six percent since 2000 and 17 percent since 1990. The City had 490,266 housing units in 2004, an increase of approximately four percent since 2000. Most of the housing stock in San Diego is relatively new and in good condition, with 93 percent of the housing stock built after 1940. In 2004, single-family detached dwellings comprised 58 percent of San Diego's total housing units while multiple family units accounted for 38 percent of the City's total housing units.

From 2004 to 2030, SANDAG estimates that the population in the City will increase by 28 percent to 1,656,257, while the number of housing units is expected to increase by 24 percent or 119,783. Multiple family units comprise the majority of housing unit growth accounting for 102,582 of the 119,783 projected housing units. Multiple family units comprised approximately 38 percent of total housing units in 2004, whereas by the year 2030 multiple family units are forecasted to represent 48 percent of all housing units in the City. Although the number of single family homes is expected to increase by 12,306, this represents only a four percent increase from 2004 to 2030.

Table 3.12-1 summarizes San Diego's population and housing forecast from 2004 to 2030.

Table 3.12-1						
City of San Diego						
Regional Forecast Population and Housing (2004 to 2030)						
	2004	2010	2020	2030	2004 to 2030 Change	
					Numeric	Percent
Total Population	1,295,147	1,365,130	1,514,336	1,656,257	361,110	28%
Household Population	1,235,672	1,303,738	1,448,395	1,582,385	336,713	27%
Group Quarters Population	49,475	61,392	65,941	73,872	24,397	49%
Civilian	33,033	43,797	48,346	56,277	23,244	70%
Military	16,442	17,595	17,595	17,595	1,153	7%
Total Housing Units	490,266	518,063	574,254	610,049	119,783	24%
Single Family	285,453	290,608	298,710	297,759	12,306	4%
Multiple Family	188,772	210,832	254,441	291,354	102,582	54%
Mobile Homes	5,625	5,553	5,871	5,635	10	0%
Persons per Household	2.65	2.62	2.65	2.7	0.05	2%

Source: San Diego Association of Governments, September 2006, *2030 Regional Growth Forecast Update, City of San Diego*.

3.12.2 Thresholds of Significance

A significant impact could occur if implementation of the Draft General Plan:

- Results in development, redevelopment, or infrastructure expansion that could displace substantial numbers of people or housing, necessitating the construction of replacement housing.

3.12.3 Impact Analysis

Could implementation of the Draft General Plan result in development, redevelopment, or infrastructure expansion that would displace substantial numbers of people or housing, necessitating the construction of replacement housing?

SANDAG projections indicate that the City's population will increase by over 360,000 people and add almost 120,000 housing units by 2030. Less than four percent of the City's nearly 330 square miles consists of vacant land. Future growth will most likely occur in existing urban areas in accordance with the Draft General Plan. The Draft General Plan calls for redevelopment, infill, and new growth to be targeted into compact and mixed-use villages. This infill strategy strives to increase housing supply and is a key component of the City's housing strategy.

In conjunction with Housing Element update adopted in December 2006, the City has identified "potential future infill housing opportunity sites" throughout the City. These sites are zoned for multifamily or mixed-use development along major transit corridors, in Downtown San Diego, and in higher-density mixed-use areas, and thus could accommodate individuals and families with a range of incomes. Most of the infill sites are zoned for residential densities at or above 30 units per acre and therefore have potential to accommodate affordable housing. Many of these sites are currently underutilized and/or located within redevelopment project areas and other Pre-World War II communities. They are generally in areas where the Draft General Plan and/or other City policies encourage additional development such as areas adjacent to light-rail or bus transit stations or stops. In addition to providing an Adequate Sites Inventory which identifies potential sites to accommodate additional housing units, the adopted Housing Element identifies additional goals, policies and programs to increase the supply and distribution of affordable housing.

Major programs include: the Inclusionary Housing Ordinance adopted in 2003, a condominium conversion policy providing tenants who are displaced due to conversion of rental units to condominiums the equivalent of three months rent to assist in relocation, the Affordable Housing and Sustainable Buildings Expedite Program adopted in 2003, which reduces processing times by up to 50 percent for projects that meet established criteria as affordable/infill projects or sustainable projects, and the Housing Trust Fund created in 1990, which utilizes fees collected from nonresidential development to subsidize the construction of affordable housing units.

The Draft General Plan also contains balanced communities and equitable development policies that are designed to minimize displacement of existing residents as communities redevelop over time. These policies include ensuring that the development of balanced communities takes into

account communitywide involvement and participation, dispersing affordable housing projects throughout the City to achieve a balance of incomes in all neighborhoods and communities, providing a variety of housing types, sizes, and prices in residential and village developments, providing affordable housing to offset the displacement of the existing population within the community, striving for balanced commercial development and accessible and equitably distributed social services throughout the City, providing linkages between employment areas, housing, and villages via an integrated transit system and a well-defined pedestrian and bicycle network, and providing a variety of different types of land uses in order to provide opportunities for a diverse mix of uses within a community.

In addition, the City has 17 redevelopment project areas throughout the City encompassing over 9,000 acres where state and local redevelopment laws regulate the provision of a certain level of affordable housing for low and moderate-income households. According to California Redevelopment Law, no less than 20 percent of tax increment revenue derived from a redevelopment project area is to be used to increase, improve, and preserve the supply of housing for very low-, low-, and moderate-income households. In addition to the 20 percent requirement, when housing units are developed by a Redevelopment Agency at least 30 percent of all new or rehabilitated dwelling units developed by the agency must be available at affordable housing cost to persons of low- and moderate-income. Also, not less than 50 percent of those units are to be available at affordable cost to persons with very low income. Housing units developed within a redevelopment project area by public agencies, private project proponents, or persons other than the Redevelopment Agency within a ten year period, are to be available at costs affordable to persons with low or moderate income. Not less than 40 percent of these units are to be available to very low-income households.

Despite City programs and policies, some displacement of residents is likely to occur as older housing units are replaced. As areas redevelop, older housing units, and in some cases more affordable housing units will be replaced by higher cost housing units. Low-income households are most likely to be adversely affected. This could result in displacement and relocation of people away from the City and the region in search of more affordable housing. The displacement of substantial numbers of people would occur over time, and may be considered a social and economic impact, but not a physical CEQA impact. If the displacement necessitates construction of some replacement housing in the City and/or region, the construction may result in significant CEQA impacts. In some instances, people will have access to City programs providing housing assistance. However, many of the programs are limited and not available in every area of the City. Therefore, the potential for a significant and unavoidable impact remains.

3.12.4 Mitigation Framework

Goals, policies, and recommendations enacted by the City combined with existing regulations and programs described above provide a framework for developing project level protection measures for future discretionary projects which may result in displacement of substantial numbers of people or housing. The City's process for evaluation of discretionary projects includes environmental review and documentation pursuant to CEQA as well as an analysis of those projects for consistency with the goals, policies and recommendations of the General Plan and the applicable community plan. In general, implementation of the above policies and compliance with established regulations would minimize impacts. Compliance with regulations is required of all projects and is not considered to be mitigation. However, it is possible that for

certain projects, adherence to the regulations and programs may not adequately address population and housing impacts and such projects would require additional measures to avoid or reduce significant impacts. These additional measures would be considered mitigation.

For each future discretionary project requiring, mitigation (i.e. measures that go beyond what is required by existing regulations), site-specific measures will be identified that reduce significant project-level impacts to less than significant or the project level impact may remain significant and unavoidable where no feasible mitigation exists. Where mitigation is determined to be necessary and feasible, these measures will be included in a Mitigation Monitoring and Reporting Program (MMRP) for the project.

3.12.5 Significance of Impact with Mitigation Framework

Since no specific development projects have been identified, it is infeasible at this Program EIR level to provide specific mitigation that would reduce impacts to a less than significant level. Therefore, displacement of substantial numbers of residents could result in a social and economic impact. The construction of replacement housing is considered a significant and unavoidable impact at this program level of review.

Notes and References

City of San Diego.

2006 *General Plan Housing Element. FY2005-2010 Draft.* November 2006.

San Diego Association of Governments (SANDAG).

2003 *Final 2030 Cities/County Forecast.* December 2003.

2004 *Final Program Environmental Impact Report for the Regional Comprehensive Plan.* June 2004.

2006 *2030 Regional Growth Forecast Update.* September 2006.

3.13 PUBLIC SERVICES AND FACILITIES

3.13.1 Existing Conditions

Existing conditions and Draft General Plan facilities guidelines for Libraries, Parks and Recreational Facilities, Schools, Fire-Rescue Services, and Police Services are included in Environmental Impact Report (EIR) **Section 2.2**. A description of the Emergency Operations Center and the condition of the City street network is also included in Section 2.2. A description of public facilities related to Water Supply, Wastewater, Storm Water, Solid Waste, Energy, and Public Utilities are found in EIR **Section 3.14**. The multi-modal existing transportation system is described in EIR **Section 3.15.1**.

3.13.2 Thresholds of Significance

A significant impact could occur if implementation of the General Plan:

- Promotes growth patterns resulting in the need for and/or provision of new or physically altered public facilities, the construction of which could cause significant environmental impacts in order to maintain service ratios, response times, or other performance objectives; or

3.13.3 Impact Analysis

Could implementation of the Draft General Plan promote growth patterns resulting in the need for and/or provision of new or physically altered public facilities, the construction of which could cause significant environmental impacts in order to maintain service ratios, response times, or other performance objectives?

Where there are increases in density, there will be a need for new or enhanced public facilities. Over the life of the General Plan, the City population is forecasted to increase by 28 percent (2004 to 2030) to 1,656,257, and total housing units are projected to increase by 24 percent to 610,049 with a two percent increase in persons per household to reach 2.7 (see **Section 2.0** Introduction, **Table 2-1** of this Program Environmental Impact Report [PEIR]).

The construction of additional housing units and the increase in population expected by 2030 over time will impact various public services and facilities. Such growth, for example, will require additional fire-rescue and police personnel, equipment, and facilities to protect and serve the public. Depending on actual demographic shifts and the number of units constructed, schools and libraries may also experience deficiencies.

In addition, the Draft General Plan calls for existing infrastructure deficiencies to be remedied. In 2002, the City estimated a 2.5 billion dollar shortfall in funding for the provision of all identified capital improvements necessary to serve existing and future development anticipated by 2020. Adequate resources for capital and operational needs must be secured, operational efficiencies need to be maximized, and facilities and services must be better tailored to meet the needs of diverse communities.

In order to improve existing facilities deficiencies, to provide for the needs of new growth, and to maintain adequate service levels, additional staff, equipment, and new or expanded facilities will be required. To help ensure that the needed facilities will be built and provided, the Draft General Plan contains detailed policies on how to evaluate growth, determine facilities needs, and to require development to pay its fair share of costs. The Draft General Plan requires that the facility needs of new development be evaluated, and that any identified prospect related facilities deficiencies be addressed to ensure that existing needs are not compounded.

General Plan policies require that development proposals fully address impacts to public facilities and services through the payment of development impact fees or facilities benefit assessments. In addition, projects that necessitate a community plan amendment due to increased densities will be required to provide or help fund physical improvements that benefit the affected community planning area. In addition, the Draft General Plan calls for the establishment of a centralized development monitoring system; and for the maintenance of up-to-date public facilities financing plans to guide the provision of public facilities. Overall, the Draft General Plan states that the City is committed to utilizing its police powers and legislative authority to ensure that needed public facilities are provided.

When public facilities are built or expanded, it can be assumed that there will be environmental impacts related to construction. The Draft General Plan includes policies that would reduce construction impacts by directing the City to minimize landform alterations and use sustainable building practices to help ensure that the actual construction of public facilities infrastructure will be as environmentally sensitive as possible. In addition, the Draft General Plan incorporates and further defines how to implement the City of Villages strategy, which was designed in part to create a development pattern that could be efficiently served by public facilities and utilities. The City of Villages strategy creates an efficient land use pattern by concentrating future growth into limited, targeted areas.

Future implementation of the General Plan will result in the construction of additional or improved public facilities. However, the construction aspects of future public facilities projects are not currently known and it is infeasible at this Program EIR level to provide specific mitigation that would reduce public facilities construction impacts to a less than significant level. As such, there is a potential for significant unavoidable impacts due to the construction of future public facilities projects. Future environmental analysis would be required for any such future project and identification of project-specific mitigation measures would be determined at that time.

3.13.4 Mitigation Framework

The need for new or upgraded facilities is addressed through the various means the City uses to fund the capital and operating expenses related to public facilities (e.g., developer fees and City Council budget decisions). However, the analysis of public services and facilities in this document focuses on the physical environmental impacts that could result from the construction of new facilities or the alteration of existing facilities. It is anticipated that many of these activities will result in physical impacts. Therefore, the framework for the mitigation of public services and facilities projects will vary, depending on the type of physical impacts resulting

from each project. For instance, if the construction of a new park would impact biological and historical resources, the project's mitigation measures would be developed using the mitigation framework in the Biological and Historical Resources sections contained in this document. In other words, the Public Facilities and Services mitigation framework is contained in the relevant impact issue area chapters of this document.

3.13.5 Significance of Impact with Mitigation Framework

No specific projects or actions have been identified with the Draft General Plan that would result in any direct or indirect physical change in the environment. However, future growth is anticipated and the construction of future public facilities needed to support that growth may result in environmental impacts. At this program level of review, impacts associated with the construction of public facilities are considered significant and unavoidable.

Future environmental analysis would be required for specific public facilities projects necessary to implement the Draft General Plan to identify associated construction-related impacts and project-specific mitigation.

3.14 PUBLIC UTILITIES

3.14.1 Existing Conditions

Regional Water Supply

The climate in the San Diego region is a semiarid coastal desert with little rainfall (averaging ten inches annually). The San Diego region relies mostly upon imported water from Northern California and the Colorado River to meet its demands. Water is purchased from the San Diego County Water Authority (Water Authority or SDCWA), which is a wholesale water agency that providing imported water to its 24 member agencies. The SDCWA, in turn, purchases water from the Metropolitan Water District of Southern California (MWD), which is a cooperative of 26 cities and water agencies serving 18 million people in six counties. The MWD imports water from two primary sources: Northern California via the State Water Project (SWP) and the Colorado River vial MWD's Colorado Aqueduct. MWD has stated that it is "prepared to provide the Water Authority's service area with adequate supplies of water to meet expanding and increasing needs in the years ahead. (SDCWA, 2005, see page 6-2)."

MWD's 242 mile-long aqueduct brings Colorado River water from Lake Havasu to Southern California. The region also receives water originating in Northern California via the State Water Project (SWP). This water is captured in reservoirs north of Sacramento and released through natural rivers and streams into the Sacramento-San Joaquin Delta. The water is delivered to southern California through a 444 mile-long aqueduct. The MWD blends Colorado River and the SWP water at a facility in Riverside County, and then transfers the untreated water to the local water treatment plants, such as the City's three treatment facilities.

The San Diego County Water Authority and the City of San Diego, along with other urban water suppliers, are required by the state to prepare urban water management plans and update them every five years. The Water Authority's 2005 Urban Water Management Plan (2005 Water Plan) identifies a diverse mix of water resources as goals to be developed through 2030 to ensure long-term water supply reliability for the region. Key diversification strategies include: conservation within the region, conserved agricultural water (from lining the All-American and Coachella Canals), and most notably, a water transfer of up to 200,000 AFY of water from the Imperial Irrigation District (IID) for a term of at least 75 years. In April 2007, The SDCWA released an updated draft to the 2005 Water Management Plan. The draft reflects actions taken by the SDCWA Board of Directors to change seawater desalination from a regional water supply project to a local water supply project, and to adopt the Water Authority's Drought Management Plan. Seawater desalination remains a key component of the Water Authority's diversification strategy, according to the draft plan (SDCWA, 2007, p. 4-7).

City of San Diego Water Supply

The City's 2005 Urban Water Management Plan describes historic and projected water supply and demand scenarios, water supply reliability, water usage trends, current and planned facilities to support demand, current and planned demand management programs, water shortage contingency plans, water recycling efforts, groundwater use, and alternative sources of water

(desalting, water transfers, groundwater storage) that the City is considering. The City's water conservation efforts, discussed below, are an important component of the City's overall water supply strategy (City of San Diego, 2005).

The City of San Diego currently imports up to 90 percent of its water from outside of the San Diego region. The remaining ten percent of San Diego's water is of local origin, collected as runoff in the City's reservoirs. The City is, therefore, heavily dependent upon imported water. The City has elected to purchase a small portion of its imported water supplies from the County Water Authority already treated by MWD ~~at the from MWD's~~ Lake Skinner Treatment Plant in Riverside County ~~Rancho California~~. The City only purchases this imported treated water for its most northern service territory because it is economically more advantageous to do so rather than pump the treated water supplies from the City's northernmost treatment facility at Miramar.

The City actively helped to form the Water Authority in 1947 to accommodate quickly growing water demands during war time. During the last 20 years the City has purchased between 100,000 and 228,000 Acre-Feet (AF) of water per year. For Fiscal Year 2005, water purchases totaled approximately 211,000 AF, representing 87 percent of the City's total water needs. In 2006, the City Water Department delivered 236,756 (AF) of treated water to its residents. Its service area is generally located within the south central portion of San Diego County and is approximately 330 square miles.

The Water Department also maintains and operates three water treatment plants with a combined total treated capacity of 294 MGD. The department maintains and operates 32 treated water storage facilities, and a series of distribution lines to serve San Diego residents. Along with the potable water supply, the City has two water reclamation plants to treat wastewater to a level that is approved for irrigation, manufacturing and other non-drinking, or non-potable purposes. The Water Department maintains and operates the recycled water distribution system.

Surface/Receiving Waters

The major receiving waters within the City include the Pacific Ocean, San Diego Bay, Mission Bay, the San Dieguito River, Los Peñasquitos Creek, the San Diego River, the Otay River and the Tijuana River (**Figure 3.7-2**, see Hydrology Section). Additionally there are minor receiving waters made up of creeks, channels, streams and lagoons. None of these receiving waters are used directly for potable water supplies. Major reservoirs of potable water within or managed by the City include Barrett, El Capitan, San Vicente, Hodges, Miramar, Murray, Lower Otay, Upper Otay, and Sutherland.

The City's water system consists of nine local surface water reservoirs with more than 410,000 AF of capacity, eight of which are connected directly or indirectly to water treatment plants. Use of local water by the City to meet water demand is affected by availability (rainfall), and water resource management policies. The City operates its reservoir system to maximize use of local water in conjunction with imported water programs. The total watershed area draining to the City's reservoirs is 946 square miles. Only 10 percent of this land is within the City. Therefore, protection of water quality in the reservoirs largely falls to other land use jurisdictions; notably, the County of San Diego.

While the City reservoirs capture local runoff, they also provide for emergency water storage. The purpose of emergency storage is to increase water supply reliability during an interruption of supply from the imported water aqueduct system. This is accomplished by maintaining a sufficient amount of water in accessible storage to ensure a supply of water to water treatment plants and customers should earthquakes or other events interrupt the supply of imported water.

Groundwater

The geography of San Diego provides limited natural local supplies in the form of groundwater, and it is not considered part of the existing supply. In order to be usable, much of the available groundwater must undergo desalination to be potable. In order to meet future water needs, the Water Department has potential groundwater supply options and has a demonstration groundwater desalination CIP project, but there is not any active use of potable groundwater at this time. Potential groundwater supplies are estimated at 6,000 – 20,000 AFY, but the current cost of utilizing the supply under current technology is infeasible. The San Pasqual/Lake Hodges groundwater basin is currently used for irrigation by some of the leaseholds.

Water Conservation

The City's Water Conservation Program was adopted by the City Council in 1985 to reduce San Diego's dependency upon imported water. The program now accounts for over 30,000 AF of potable water savings each year (San Diego, 2006H). (One AF of water equals 325,851 gallons or enough water to cover an area of land about the size of a football field one foot deep.) The Water Conservation Program includes such initiatives as the Commercial Landscape Survey Program, the Residential Interior/Exterior Survey Program, the Ultra Low-Flow Toilet and High-Efficiency Clothes Washer incentive programs, a web-based Landscape Watering Calculator, and a variety of public outreach and education efforts.

Recent legislation (Assembly Bills 2717 and 1881) identifies landscape irrigation as the single largest use of water in California's urban areas, and requires local jurisdictions to implement landscape water conservation recommendations that have been customized to respond to local climate, demographic, and economic factors. The City is participating in a regional effort to develop a customized strategic plan for landscape water conservation in San Diego County (San Diego, 2006K).

The City's 2005 Urban Water Management Plan sets long-range water saving goals of 32,000 AF per year by 2010; 36,000 AF by 2020 and 46,000 AF by 2030 (San Diego, 2006K). Conservation is expected to represent ten percent of San Diego's annual water demands in 2020 (San Diego, 2006F).

Wastewater Management

The City's Metropolitan Wastewater System treats the wastewater from the City and 15 other cities and districts (called Participating Agencies) from a 450-square-mile area with a population of over 2.2 million. An average of 180 million gallons of wastewater is treated daily. The Participating Agencies are the cities of Chula Vista, Coronado, Del Mar, El Cajon, Imperial Beach, La Mesa, National City, Poway, the Lemon Grove Sanitation District, the Otay Water

District, the Padre Dam Municipal Water District, the county of San Diego (including Lakeside/Alpine, Spring Valley, Wintergardens, and East Otay Mesa).

Wastewater from this service area of over 450 square miles is conveyed through 2,897 miles of collection pipeline, 83 pump stations, to the North City Water Reclamation Plant, the Point Loma Wastewater Treatment Plant (PLWTP or Point Loma Plant), and the South Bay Water Reclamation Plant (SBWRP). Treated effluent is discharged to the Pacific Ocean through two ocean outfalls. Solids from the wastewater treatment plants are processed at the Metro Biosolids Center located at the Marine Corps Air Station, Miramar (San Diego, 2003, and MWWD presentation of 1/19/07).

In the 1990s, the City constructed the two water reclamation plants, the biosolids treatment facility, and several pump stations, and made major upgrades to the Point Loma Plant. The treatment plant and two reclamation plants provide a functional treatment system capacity of 285 MGD, sufficient to meet the projected needs of the 450-square-mile service area through at least 2020. The two water reclamation plants produce reclaimed water for appropriate uses (including plant operation and irrigation) and support the City's water service strategy of diversifying water supply sources to reduce future reliance on imported water. Reclaimed water is sold and distributed by the City. **Figure 3.14-1**, Wastewater Facilities, identifies the location of these facilities.

The City is currently operating under a Partial Consent Decree in response to litigation over past sewer spills. There continues to be a need to rehabilitate or replace many pipelines, trunk sewers and pump stations to meet the City's wastewater management needs in accordance with state and federal requirements.

Storm Water Management

The City's storm water pollution prevention efforts and conveyance system is designed to protect the quality of recreational waters and potable water resources as mandated by the Federal Clean Water Act of 1972, and the San Diego Regional Water Quality Control Board. The City also maintains compliance with the Water Quality Control Plan for the San Diego Region, also referred to as the Basin Plan, and with storm water permits. These functions require a multi-faceted approach that couples infrastructure improvements and maintenance, water quality monitoring, source identification of pollutants, land use planning policies and regulations, and pollution prevention activities such as education, code enforcement, outreach, public advocacy, and training. The City's storm water infrastructure includes more than 39,000 storm drain structures and over 900 miles of storm drain pipes and channels serving approximately 237 square miles of urbanized development.

Solid Waste Management

The City implements integrated solid waste management strategies that emphasize waste reduction and recycling, composting, and environmentally-sound landfill management to meet the City's long-term disposal needs. The primary focus of the City's solid waste management planning is preventing materials from entering the waste stream through citywide source reduction, recycling and composting programs. This emphasis is consistent with federal law under the Resource Conservation and Recovery Act, subtitle D, and the California's Integrated Waste Management

Act. These waste reduction programs are detailed in the City's *Source Reduction and Recycling Element* planning document, which is updated annually.

Non-recyclable solid waste is disposed of at the Miramar Landfill, which is a City-operated landfill. More than 1.4 million tons of waste is disposed at the Miramar Landfill every year. Operation of the facility requires a Solid Waste Facility Permit, issued by the City's Local Enforcement Agency, which reports to the California Integrated Waste Management Board. The facility must also comply with all applicable state environmental regulations. At that current rate, Miramar is expected to close by 2012. However, the Environmental Services Department has initiated a project that would allow up to a 20-foot height increase, allowing the landfill to operate until approximately 2016. Currently, only two other landfills provide disposal capacity within the urbanized region: Allied Waste's Sycamore and Otay landfills. The Sycamore Landfill is located to the east of Miramar, within the City's boundaries. A proposed expansion of Sycamore Landfill is currently under review by the City. The Otay Landfill is located within an unincorporated island within the City of Chula Vista. Solid Waste Facilities are identified on **Figure 3.14-2**.

State of California regulations for solid waste (California PRC § 41700 - 41721.5) require that each region have a plan with adequate capacity to manage or dispose of solid waste for at least fifteen years into the future. The solid waste plan for the San Diego County region is contained in the *Integrated Waste Management Plan, Countywide Siting Element*, ~~December 2004~~[January 2005](#). The plan shows that unless a new landfill is opened and/or existing landfills are expanded, the region has insufficient disposal capacity. It is the goal of the San Diego Association of Governments' (SANDAG) *Comprehensive Resource Management Plan*, the *Countywide Siting Element*, and the Draft General Plan to make every effort to extend the life of existing disposal facilities. SANDAG's *Regional Comprehensive Plan (RCP)* Chapter 4F provides similar language regarding "maximizing existing disposal capacity."

State Assembly Bill 939 sets forth a target for solid waste diversion. It mandates that 50 percent of the solid waste must be diverted from landfills by 2005. The City has achieved a 52 percent diversion rate (San Diego, 2006C). However, as of 2002 (per the *Countywide Siting Element*), the San Diego Region had not yet met this target (SANDAG, 2006). The RCP aims to work toward a 75 percent diversion rate.

Energy (Electrical Power and Natural Gas)

The City participates in regional energy planning efforts, and is actively working to achieve the City's long-term goal to pursue energy independence.

Electricity is produced at power plants and transmitted over power lines to users. Some electricity is produced within the San Diego region at the Cabrillo (Encina) and South Bay Power Plants, as well other smaller power plants. San Diego Gas & Electric Company (SDG&E) provides energy service to 3.3 million consumers through 1.3 million electric meters and more than 800,000 natural gas meters in San Diego and southern Orange counties. The utility's area spans 4,100 square miles. **Figure 3.14-3**, Gas and Electric Substations and Transmission Lines, identifies some of SDG&E's facilities within the City.

Natural gas is imported into the City from sources outside of the region through pipelines to users. There are no storage facilities for natural gas in the region. Gas is used primarily for generating electricity and for heating homes and businesses. There is a growing demand for gas in the region (SANDAG, 2004B).

The Regional Energy Strategy (RES) 2030 was produced to develop a vision for how energy will be produced and consumed in the region (SANDAG, 2003). This strategy developed policies and provided measurable targets to achieve the region's sustainable energy vision. At a regional level, the current status toward meeting these targets is reported in the RCP Performance Monitoring Report (SANDAG, 2006). Specific RES targets and progress in meeting them include:

Target: Achieve a reduction in both per capita electricity peak demand and overall per capita electricity consumption back to 1990 levels (5,151 kWh per capita) by 2010.

Progress: Since RES adoption in 2003, per capita electricity consumption has increased an average of two percent per year, and it is approximately 16 percent higher than 1990 levels. However, California has the lowest per capita electricity consumption of any state and consumes almost 50 percent less electricity per capita than the national average, and San Diego's per capita consumption was 23 percent lower than the state level in 2000 and 15 percent lower in 2003.

Target: Achieve and maintain the capacity to generate 65 percent of summer peak demand with in-county generation by 2010, and 75 percent by 2020.

Progress: In-region assets currently provide approximately 60 percent of total capacity needs, though their operation is at less than capacity due to the potential environmental impacts and other factors.

The share of energy produced within the region has decreased to roughly 25 percent in 2005. In 1990 and 1995, energy produced in the region remained steady at roughly 34 percent.

Target: The development of renewable energy resources such as wind, solar, and geothermal is specifically encouraged in the RCP, and the Draft General Plan, and targets have been established in the RES and by state law.

Progress: By 2005, the share of energy produced from renewable resources reached 5.3 percent. This was a large improvement over the previous ten years when only one percent or less of energy produced was from renewable resources.

SDG&E has stated that it will reach the state-required 20 percent Renewable Portfolio Standard (requires sellers of electricity to have renewable power in their mix) in 2010, a target which is five percent higher than the original RES target for that year. The City implements measures to

reduce the energy used in City buildings and operations, to generate energy from renewable sources, and to encourage communitywide energy conservation efforts. Through its energy generation efforts, the City produces a maximum of 153,300 megawatt hours annually of electricity, equivalent to powering 14,194 homes. The electricity is produced from renewable sources such as methane gas harvested from the City's Miramar Landfill, from treated wastewater that drives a hydro generator, and from photovoltaics placed on City buildings. In addition, the City has signed on to the U.S. Mayors Climate Protection Agreement, which includes taking actions to conserve energy and water conservation, and to promote the use of renewable energy resources (see PEIR Section 5.0 which addresses climate change).

Communications

The California Constitution vests in the California Public Utilities Commission (CPUC), the exclusive power and sole authority to regulate privately-owned or investor-owned public utilities such as SDG&E. This exclusive power extends to all aspects of the location, design, construction, maintenance, and operation of public utility facilities. Nevertheless, the CPUC has provisions for regulated utilities to work closely with local governments and give due consideration to their concerns. The state also regulates energy consumption under Title 24 of the California Code of Regulations. The Title 24 Building Energy Efficiency Standards apply to energy consumed for heating, cooling, ventilation, water heating, and lighting in new residential and non-residential structures.

The primary public utility in the region is SDG&E. In addition to the major energy utility, there are other prominent utilities serving the City and region. AT&T is the nation's largest telecommunications company providing local residents with integrated communications and entertainment services including Internet Protocol (IP)-based IP network capabilities which integrate voice, data and video. The dominant providers of communications networks and cable television programs are Cox Communications and Time Warner Cable, providing cable, high-speed internet, and digital telephone services.

Utilities Undergrounding

The City of San Diego has been undergrounding lines since 1970 and the program is currently relocating approximately 30-35 miles of overhead utility lines underground throughout the City each year. It is estimated that nearly all residential areas will be completed within the next ~~20-~~ 25-50 years.

The Utilities Undergrounding Program consists of two types of projects: one involves SDG&E Rule 20 (or SBC tariff 32) projects that must meet certain public benefit criteria consistent with the California Public Utility Commission's statewide program. This program relates primarily to overhead lines along major city streets. The second type is known as a Surcharge project which is where the project is funded by the increased franchise fee authorized by the CPUC in Resolution E-3788. Projects that fall into the surcharge category are typically found in residential areas that do not meet Rule 20 criteria.

3.14.2 Thresholds of Significance

A significant impact could occur if implementation of the General Plan:

- Results in the use of excessive amounts of water beyond projected available supplies;
- Promotes growth patterns resulting in the need for and/or provision of new or physically altered utilities, the construction of which could cause significant environmental impacts in order to maintain service ratios, or other performance objectives; or
- Results in the use of excessive amounts of electrical power, fuel or other forms of energy.

3.14.3 Impact Analysis

Could implementation of the Draft General Plan result in the use of excessive amounts of water beyond projected available supplies?

Implementation of the Draft General Plan anticipates that population growth will occur, and with population growth there will be an increase in water demand. SANDAG's latest projection, the *2030 Regional Growth Forecast* (SANDAG, 2004C) was used in the water demand projections in the Urban Water Management Plan, 2005. The data indicates that the City of San Diego's population is expected to increase from about 1.3 million to almost 1.7 million in 2030. The growth rate for the incremental years is predicted to be 28 percent. In 2006, 236,756 AF of treated water was delivered by the City Water Department. By 2030, the City's water demands are projected to increase to a total demand of 275,925 AFY.

The Water Authority's 2005 Water Plan projects reliability of its water supply through 2030 to correspond with the SANDAG growth forecast and the City's projected demand of 275,925 AFY. Major sources of water identified in the Water Authority and City 2005 Water Plans are discussed above (see **Section 3.14.1**). To alleviate the risk of unforeseen shortages, the Water Authority would pursue other strategies to increase water supply involving the use of recycled water, ground water, conservation, canal lining, and surface storage to meet service area needs. As a member agency, the City of San Diego participates in implementing the Water Authority's strategies. Additionally, the City has also identified its efforts to conserve water, increase use of recycled water, and consider new alternative sources of water as important programs to help meet San Diego's future water demand.

Water supply projects pursued by the Metropolitan Water District, the San Diego County Water Authority, and the City of San Diego are subject to environmental regulatory constraints and each project must satisfy the requirements of CEQA.

A discussion of specific future impacts and associated mitigation measures for each water supply project is beyond the scope of this EIR; however, future water supply projects can be expected to include both construction-related and operation-related impacts. Construction would include physical alteration of land and the building of structures to develop storage facilities or

desalination plants, and may involve direct and indirect, short- and long-term impacts related to environmental topics, such as air quality; noise; traffic; biological resources; cultural resources; agricultural resources; aesthetics; geology/soils; and hydrology/water quality. Operation of storage facilities and desalination plants may also create direct and indirect, short- and long-term impacts related to these same environmental topics as water is stored, transferred, distributed and/or treated, and the human activity required to conduct these operations takes place.

Construction-related and operation-related environmental impacts for future water supply projects may create significant impacts in the environmental areas mentioned above. Such significant impacts require the application of feasible mitigation measures to avoid or reduce them under CEQA. Many significant environmental impacts associated with similar projects constructed and operated throughout California (such as, water storage facilities, water treatment plants, wastewater treatment plants, and water distribution systems) have been successfully mitigated (reduced to less than significant levels) or avoided through environmentally sensitive approaches to project design or adherence to existing regulatory standards. The same types of mitigation measures, design approaches and regulatory standards would be applied to future water supply projects identified as options to reduce the risk of unforeseen water shortages in the San Diego area.

Additional information on the types of permits and regulatory actions associated with major water supply projects can be found as follows:

- State Water Project – SDCWA, 2005, pp. 6-7 -6-10
- Water Transfer Agreement (canal lining) – SDCWA, 2005, p 4-2
- Groundwater and Recycling – SDCWA, pp 5-5 -5-20
- Water Quality Issues – SDCWA, pp. 7.1-7.8

Urban development that may occur under the Draft General Plan is not expected to exceed the projections made by SANDAG and used in the 2005 Water Plans. However, if unforeseen shortages occur and alternative water sources are not available, the City may limit or condition the approval of development that could significantly impact water supply either individually or cumulatively. Conditions could include all reasonable mitigation to avoid, minimize, or offset the impact.

Contingency plans also exist for addressing the uncertainties of ensuring water supply in the case where a catastrophic water shortage occurs during a disaster. In addition to an Emergency Response Plan, which includes policies and emergency procedures that would address such an incident, the Water Authority is implementing its Emergency Storage Project which has been designed to reduce the risk of potential catastrophic damage that could result from prolonged interruption of imported water due to earthquake, drought or other disaster. The Emergency Storage Project consists of a system of reservoirs, pipelines and other facilities that will work together to store and move water around the county in the event of a natural disaster and is scheduled for completion in 2012. Further, in order to address uncertainties associated with maintaining and developing local and imported water supplies, the Metropolitan Water District of Southern California (MWD) is developing a comprehensive Drought Management Plan that would be coordinated throughout the San Diego Region. The Drought Management Plan will

provide the Water Authority and its member agencies with a series of actions to take when faced with a shortage of imported water supplies from MWD due to drought conditions. This plan will include all aspects of drought planning including steps to avoid rationing, drought response stages, allocation methodology, pricing, and communication strategy (SDCWA, 2005 see p.9-1 through 9-12).

Two recent court cases could have an effect on the analysis of water supply in this EIR. The first case impacts the provision of water resources to the City. The second case more clearly defines legal requirements for documenting the reliability of water supplies for large projects such as the Draft General Plan. In 2007, *Natural Resources Defense Council v. Kempthorne* (also known as the “Delta Smelt” case) required pumping reductions to protect the habitat of endangered species in the Sacramento Delta, particularly during dry and critically dry years. Because this is a source of water for the SDCWA, there could be a direct effect on the water supply to the City. The Department of Water Resource projects reductions in the range of 12-37% of normal volumes during winter and spring breeding months. Because of the added reliability SDCWA has with the Imperial Irrigation District water transfer, the effect on the City would be reduced from that 12-37%. To meet this challenge, contingency plans of the City of San Diego, San Diego County Water District and Metropolitan Water District, and in particular water conservation measures, and additional water transfers, could be activated to compensate for the reduction in supply during dry years.

Additional policies in the Draft General Plan will augment these contingency plans for the City. During the 1987-1992 drought, supplies to the SDCWA were reduced by as much as 31% , and contingency plans were developed and implemented to be able to meet the crucial demands for water supply to the region (SDCWA, 2005).

The 2005 Urban Water Management Plan covers contingency plans for dry years and related to delivery of water from the State Water Project.

The Draft General Plan emphasizes the need to provide and maintain essential water supply infrastructure to serve existing and future development, to continue to participate in watershed planning efforts, and to coordinate land use planning and water infrastructure planning with local, state, and regional agencies.

Potential future impacts related to water supply can be reduced through -Draft General Plan policies and ongoing City programs that direct the City to implement a balanced, water conservation strategy as an effective way to manage demand by: reducing dependence on imported water supplies; maximizing the efficiency of existing urban water and agricultural supplies through conservation measures/programs; and developing alternative, reliable sources to sustain present and future water needs. Policies and programs also call for an integrated approach to watershed planning, and water supply and land use studies to ensure that the City can provide adequate water supplies for present uses and accommodate future growth.

As required by the Urban Water Management Planning Act, the Development Services Department (DSD) ensures that major projects are sited and designed to minimize impacts to water resources. Pursuant to SB 610, prior to approval of any discretionary permit for a future

project, DSD ensures that the water purveyor of a public water system prepare a water supply assessment to be included in the environmental documentation of certain large proposed projects including:

- a. Residential developments of more than 500 units;
- b. Shopping centers or businesses employing more than 1,000 people or having more than 500,000 square feet of floor space;
- c. Commercial office buildings employing more than 1,000 people or having more than 250,000 square feet of floor space;
- d. Hotels or motels having more than 500 rooms;
- e. Industrial, manufacturing, or processing plants or industrial parks planned to house more than 1,000 people or having more than 650,000 square feet of floor space;
- f. Mixed-use projects that include one or more of the above types of projects;
- g. Projects that would demand an amount of water equivalent to, or greater than, the amount of water required by a 500 dwelling unit project.

In addition, pursuant to SB 221, DSD also requires affirmative written verification from the water purveyor of a public water system that sufficient water supplies are available for certain large residential subdivisions of property prior to approval of a tentative map.

The projected water supply is anticipated to meet water demands for the Year 2030. Alternatives such as the development of additional storage, the use of recycled water, ground water, conservation, and canal lining have been identified by the Water Authority to alleviate the risk of potential water shortages. Additionally, water strategies have also been identified by the City such as water conservation efforts, increased use of recycled water, and new alternative sources of water (i.e. desalting, water transfers, groundwater storage, and repurifications) have been identified to help diversify the City's sources of water and consequently improve water supply reliability. To address catastrophic water shortages and drought management planning, the Water Authority and its member agencies, through emergency storage and response plans, are taking actions to prepare for and adequately handle a potential catastrophic interruption of water supply. Furthermore, the Drought Management Plan would identify actions to be taken by the Water Authority to minimize impacts resulting from a water shortage due to drought and include strategies to address water related emergencies. This management plan can also be applied to reductions in imported water supply related to protection of endangered species habitat.

Additionally, the City has the ability to condition development with all reasonable mitigation to avoid, minimize, or offset the impact to the water supply should unforeseen water shortages occur and alternative water sources are not available. Therefore, no significant impact has been identified at this program level of analysis.

Could implementation of the proposed General Plan promote growth patterns resulting in the need for and/or provision of new or physically altered utilities, the construction of which could cause significant environmental impacts in order to maintain service ratios, or other performance objectives?

The Draft General Plan calls for future growth to be focused into mixed-use activity centers linked to the regional transit system. Implementation of the plan would result in infill and

redevelopment occurring in selected built areas, which would be identified through the community plan update/amendment process. The Draft General Plan would also guide the development of remaining developable vacant land. The City's existing built areas are currently served by water, solid waste, storm water infrastructure and public utilities infrastructure. However, some of the City's built areas have existing infrastructure deficiencies and would require capacity improvements to serve the additional population. Therefore, it is anticipated that new or improved public utilities infrastructure would be required to meet the needs of new growth occurring through infill/redevelopment as well as on remaining vacant, developable lands.

In order to ensure that the needed facilities will be built and provided, the Draft General Plan contains detailed policies on how to evaluate growth, determine facilities needs, and to require development to pay its fair share of costs. The Draft General Plan requires that the facility needs of new development be evaluated, and that any project-related facilities deficiencies be addressed to ensure that existing needs are not compounded. The Draft General Plan policies require development proposals to fully address effects on public facilities and services through the payment of development impact fees or facilities benefit assessments. In addition, projects that necessitate a community plan amendment due to increased densities will be required to provide or help fund physical improvements that benefit the affected community planning area. In addition, the Draft General Plan calls for the establishment of a centralized development monitoring system; and for the maintenance of up-to-date public facilities financing plans to guide the provision of public facilities. Overall, the Draft General Plan states that the City is committed to utilizing its police powers and legislative authority to ensure that public facilities and utilities are provided.

To minimize the need for new facilities and utilities, the Draft General Plan contains policies that call for cooperative planning and joint use with other agencies, resource conservation to reduce demand for water and energy, implementation of best management practices and public education efforts to reduce the need for storm water pollution and protect reservoirs, increased waste diversion, and coordinated planning with developers and utility providers. In addition, the Draft General Plan incorporates and further defines how to implement the City of Villages strategy, which was designed in part to create a development pattern that could be efficiently served by public facilities and utilities. The City of Villages strategy creates an efficient land use pattern by concentrating future growth into limited, targeted areas.

The Draft General Plan also includes policies that would reduce construction impacts by directing the City to minimize landform alternations and use sustainable building practices to help ensure that the actual construction and operations of public utilities infrastructure will be as environmentally sensitive as possible.

Future growth is anticipated by the Draft General Plan and expansion or construction of the following types of infrastructure/public utilities will be needed to serve that growth:

Water System

In response to state and federal mandates, the City is required to make improvements to its water treatment facilities, replace cast iron water mains, and implement a wide variety of improvements

throughout the water system. The City has prepared a Capital Improvement Program (CIP) to address these issues as well as to ensure sufficient capacity and water quality for the future. (San Diego, 2006J). On February 26, 2007, The City Council approved a water and sewer rate increase to pay for this infrastructure investment.

The Draft General Plan has policies that call for the City to maintain conveyance and treatment capacity, and to coordinate land use planning and water infrastructure planning to provide for future development and maintain adequate service levels.

Regional population growth projections, generally based on SANDAG 2030 forecasts, are used for facility planning purposes (San Diego, 2006I). Implementation of the General Plan is not anticipated to result in population increases that exceed SANDAG's forecast. However, the construction aspects of future water infrastructure projects are not currently known and it is infeasible at this Program EIR level to provide specific mitigation that would reduce impacts to a less than significant level. As such, there is a potential for significant unavoidable impacts due to the construction of future water infrastructure improvements. Future environmental analysis would be required for any such future project (i.e. a private development project or CIP project) and identification of project-specific mitigation measures would be determined at that time.

Wastewater Management

The City must make improvements to upgrade its wastewater facilities and meet state and federal mandates. On February 26, 2007, the City Council approved a water and sewer rate to pay for this infrastructure investment. The Draft General Plan has policies that call for the City to maintain conveyance and treatment capacity, and to coordinate land use planning and wastewater infrastructure planning to provide for future development and maintain adequate service levels.

Regional population growth projections, generally based on SANDAG 2030 forecasts, are used for facility planning purposes (San Diego, 2006I). Implementation of the General Plan is not anticipated to result in population increases that exceed SANDAG's Forecast. However, the construction aspects of future wastewater infrastructure projects are not currently known and it is infeasible at this PEIR level to provide specific mitigation that would reduce impacts to a less than significant level. As such, there is a potential for significant unavoidable impacts due to the construction of future wastewater infrastructure. Future environmental analysis would be required for any such future project (i.e. a private development project or CIP Project) and identification of project-specific mitigation measures would be determined at that time.

Storm Water Management

The City invests in storm water infrastructure (curbs, gutters, inlets, catch basins, pipes, and others) to help reduce pollutant loading to acceptable levels. The City's storm drain fee and other sources of funds are instrumental in ensuring compliance with legal mandates and maintaining storm water prevention and conveyance functions.

The Draft General Plan has policies to install infrastructure, where feasible, to capture, minimize, and prevent pollutants in urban runoff from reaching receiving waters and potable water supplies. However, the construction aspects of future storm water infrastructure projects are not currently known and it is infeasible at this PEIR level to provide specific mitigation that would

reduce impacts to a less than significant level. As such, there is a potential for significant unavoidable impacts due to the construction of future storm water infrastructure improvements. Future environmental analysis would be required for any such future project (i.e. a private development project or CIP project) and identification of project-specific mitigation measures would be determined at that time.

Solid Waste Management

Disposal needs in the San Diego area continue to grow as a result of population growth, and changes in the nature of the commercial, industrial, and residential sectors of the City. The City implements integrated solid waste management strategies that emphasize waste reduction and recycling, composting, and environmentally-sound landfill management to meet the City's long-term disposal needs. The primary focus of the City's solid waste management planning is preventing materials from entering the waste stream through citywide source reduction, recycling and composting programs.

The City has achieved a 52 percent diversion rate (San Diego, 2006C). However, even with continued increases to the City's diversion rate, additional landfill capacity is needed. Actions to increase landfill capacity include a City proposal to increase the elevation of the active portion of Miramar Landfill up to 20 feet, to add approximately four years of capacity to the landfill. An EIS/EIR for this proposal is currently being prepared (Lisa Wood, 1/07). Also, a proposal to expand the Sycamore Landfill is being processed by the City. Additional actions will be needed to increase landfill capacity; however, the construction aspects of future solid waste disposal projects are not currently known and it is infeasible at this PEIR level to provide specific mitigation that would reduce impacts to a less than significant level. As such, potential impacts due to the construction of future solid waste disposal improvements are considered significant and not yet mitigated. Future environmental analysis would be required for any such future project and identification of project-specific mitigation measures would be determined at that time.

Communications

Providing and planning for adequate public utilities and the means to transmit, convey, or provide the service is essential to ensuring that services and utilities keep pace with anticipated growth. The scarcity of suitable facility sites and the sensitivity of conserved resource areas, especially in urbanized areas where many facilities are located, make planning for sufficient public utilities challenging. The Draft General Plan has policies to provide, maintain, and operate public utilities in a manner that enhances the environment. Specific policies call for the City to integrate the design and siting of safe and efficient public utilities and associated facilities into the early stages of the long range planning and development process, and cooperatively plan for and design new or expanded public utilities and associated facilities (e.g., telecommunications infrastructure, planned energy generation facilities, gas compressor stations, gas transmission lines, electrical substations and other large scale gas and electrical facilities) to maximize environmental and community benefits.

The specific locations and design of future public utility and communications lines are unknown at this time. For the purposes of this impact analysis, it is assumed that impacts to public utilities may occur with future actions. However, the construction aspects of future communications projects are not currently known and, it is infeasible at this PEIR level to provide specific

mitigation that would reduce impacts to a less than significant level. As such, there is a potential for significant unavoidable impacts due to the construction of future communications improvements. Future environmental analysis would be required for any such future communications project and identification of project-specific mitigation measures would be determined at that time.

Could implementation of the proposed General Plan result in the use of excessive amounts of electrical power, fuel or other forms of energy?

Energy

The proposed action is the adoption of a Draft General Plan that does not specifically address any particular development project. However, implementation of the Plan has the potential to result in impacts to energy supply due to the planned-development that is anticipated to occur in response to project population growth, and the potential for additional growth that could result from subsequent community plan updates.

The City is taking a leadership role in an effort to conserve energy and reduce Greenhouse Gas Emissions (GHG). In 2002, the San Diego City Council approved the San Diego Sustainable Community Program. The Program includes participation in the Cities for Climate Protection (CCP) program coordinated through the International Council of Local Environmental Initiatives (ICLEI); and establishment of a 15 percent GHG reduction goal set for 2010. In October 2006, the City continued its efforts to reduce GHG as the Mayor signed on to the U.S. Mayor's Climate Protection Agreement. Under the agreement, the City has committed to strive to meet or beat the Kyoto Protocol targets that include increasing energy efficiency and water conservation; reducing vehicle miles traveled; maintaining healthy urban forests; reducing sprawl; and promoting the use of clean, renewable energy resources. In addition a major focus of the Draft General Plan is to create compact, walkable communities that are connected to the region's transit system, while protecting important open spaces. The Draft General Plan includes comprehensive policy guidance calling for GHG emission reductions, increased use of clean, renewable energy, development of a multimodal transportation system, expansion of the urban forest, and a continued commitment to sustainable development.

Specific actions that City departments are taking to help meet Kyoto Protocol targets include the following:

1. City efforts to increase the average fuel efficiency of municipal fleet vehicles include the use of alternative fuels for the refuse collection fleet.
2. Trash collection routes were rerouted to reduce greenhouse-gas producing fuel emissions by reducing the miles traveled.
3. The City produces and uses methane-generated power from landfills and sewage treatment plants, and generates solar energy through panels on City buildings that produce almost 516,000 kilowatts hours of electricity annually (San Diego, 2006c).

4. Since its establishment in 2001, the City's energy program (applies to the City organization) saves 24 million kWh annually (San Diego, 2006C). New construction or retrofits for the City that are 10,000 sq ft or more need to meet U.S. Green Building Council's Leadership in Energy and Environmental Design (LEED) silver standards. The LEED Rating System measures performance in: sustainable site development, water savings, energy efficiency, materials selection, and indoor environmental quality (USGBC).
5. City participation in the San Diego Regional Energy Partnership to reduce energy consumption and demand in Southern California (San Diego, 2006d) through a variety of programs including: incentives for residential retrofits, residential outreach/education, peer-to-peer education, and City energy efficiency retrofits.

General Plan policies and City programs would aid in reducing adverse energy impacts, but the projected population growth in the City would result in an increased demand for energy. Additional actions may be needed to increase energy supply; however, the construction aspects of future energy supply projects are not currently known and it is infeasible at this PEIR level of analysis to provide specific mitigation that would reduce energy demand impacts to a less than significant level. As such, there is a potential for significant and unavoidable impacts due to excessive energy consumption and the construction of future energy supply improvements. Future environmental analysis would be required for any such future project and identification of project-specific mitigation measures would be determined at that time.

3.14.4 Mitigation Framework

Water Supply

No significant impact has been identified for this issue area.

Public Utilities Infrastructure (Water System, Wastewater Management, Storm Water Management, Solid Waste Management, Communications)

See **Section 3.13-3** for the mitigation framework pertaining to the construction of public utilities infrastructure.

Energy

Goals, policies, and recommendations enacted by the City combined with the federal, state and local regulations described above provide a framework for developing project level public utilities resource protection measures for future discretionary projects. The City's process for the evaluation of discretionary projects includes environmental review and documentation pursuant to CEQA as well as an analysis of those projects for consistency with the goals, policies and recommendations of the General Plan. In general, of the above policies and compliance with the federal, state, and local regulations would preclude or substantially reduce energy impacts.

Compliance with standards is required of all projects and is not considered to be mitigation. However, it is possible that for certain projects, adherence to regulations may not adequately avoid or reduce impacts, and such projects would require additional measures. For each future

City project requiring mitigation (i.e., measures that go beyond what is required by existing regulations), site-specific measures will be identified that reduce significant project-level impacts to less than significant, or the project level impact may remain significant and unavoidable where no feasible mitigation exists. Where mitigation is determined to be necessary and feasible, these measures will be included in a Mitigation Monitoring and Reporting Program (MMRP) for the project. The Mitigation Framework measures listed below summarize general measures that may be implemented to preclude impacts. These measures may be updated, expanded and refined when applied to specific future projects based on project-specific design and changes in existing conditions, and local, state and federal laws. Potential measures include:

- Innovative project design, construction and operations to reduce stormwater pollution, **and** energy use, and waste generation. The City’s Sustainable Building Policy (900-14) allows an expedited review time for the private sector proposing projects meeting **specified criteria including the** LEED Silver rating standard for energy efficient construction and design.
- Implementation of water and energy conservation measures beyond what is required by local, state, and federal regulations.
- Project siting, mix of land uses, and design that reduces the need to drive, thus reducing vehicle miles traveled compared to what would occur through conventional development.
- Strategic planting of trees in quantities and locations that maximizes environmental benefits such as shading.

3.14.5 Significance of Impact with Mitigation Framework

No specific projects or actions have been identified with the Draft General Plan that would result in any direct or indirect physical change in the environment. However, future growth is anticipated and the **level of energy demand and the** construction of future public utilities needed to support that growth may result in environmental impacts. Therefore, impacts associated with **excessive energy demand and** the construction of public utilities may occur and even though potential mitigation framework measures have been identified, those impacts remain significant and unavoidable.

Future environmental analysis would be required for specific public utilities projects necessary to implement the Draft General Plan to identify associated construction-related impacts and project-specific mitigation

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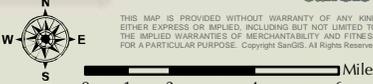


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Figure 3.14-1
Wastewater Facilities

- Facility Proposed or Under Construction
 - Facility Existing
 - Pipelines Proposed
 - Pipelines Existing
 - City of San Diego Metro System
 - Metro Wastewater Participating Agency
- Key: WRP - Water Reclamation Plant
 Source: City of San Diego, Metropolitan Wastewater Department


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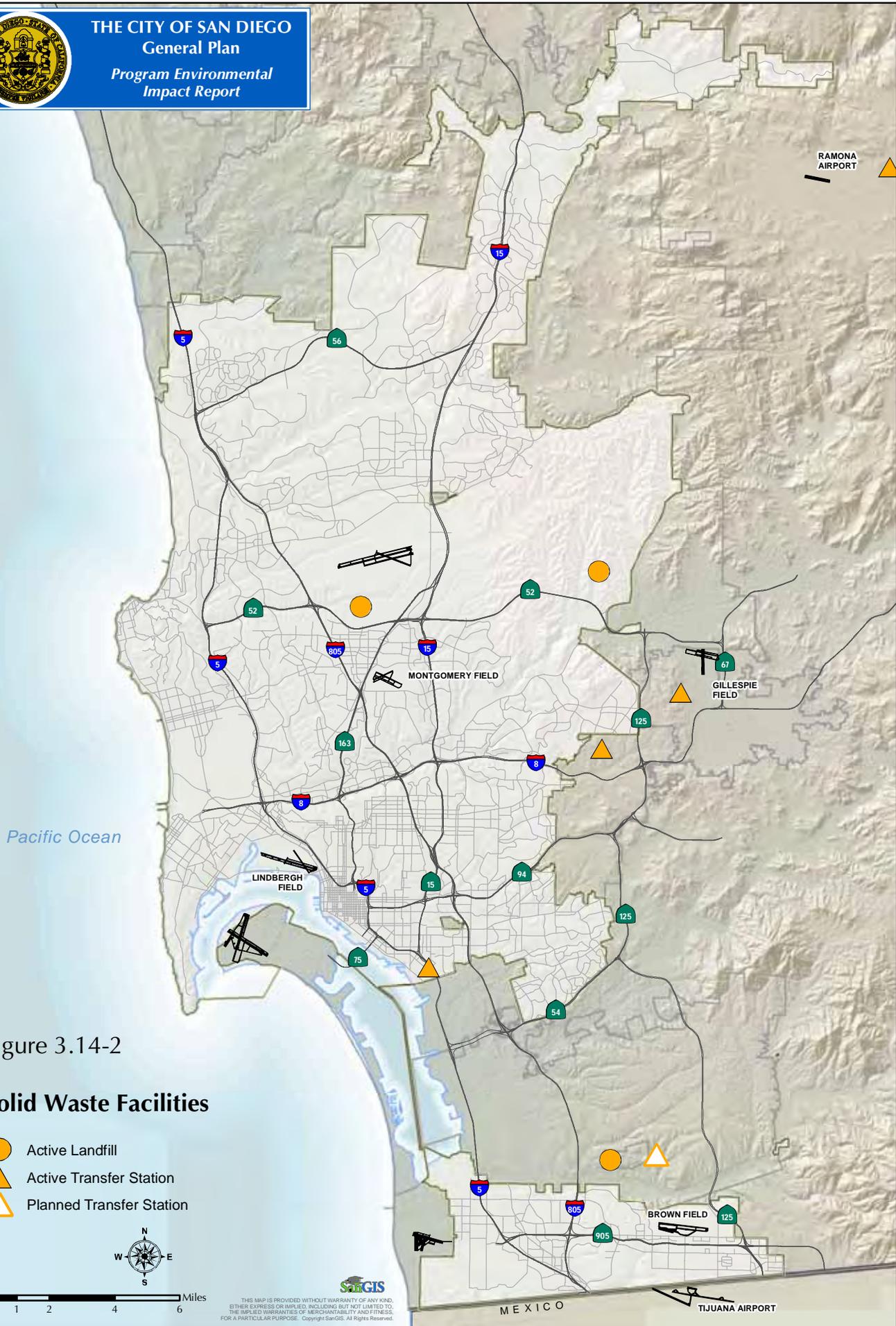


Figure 3.14-2

Solid Waste Facilities

-  Active Landfill
-  Active Transfer Station
-  Planned Transfer Station



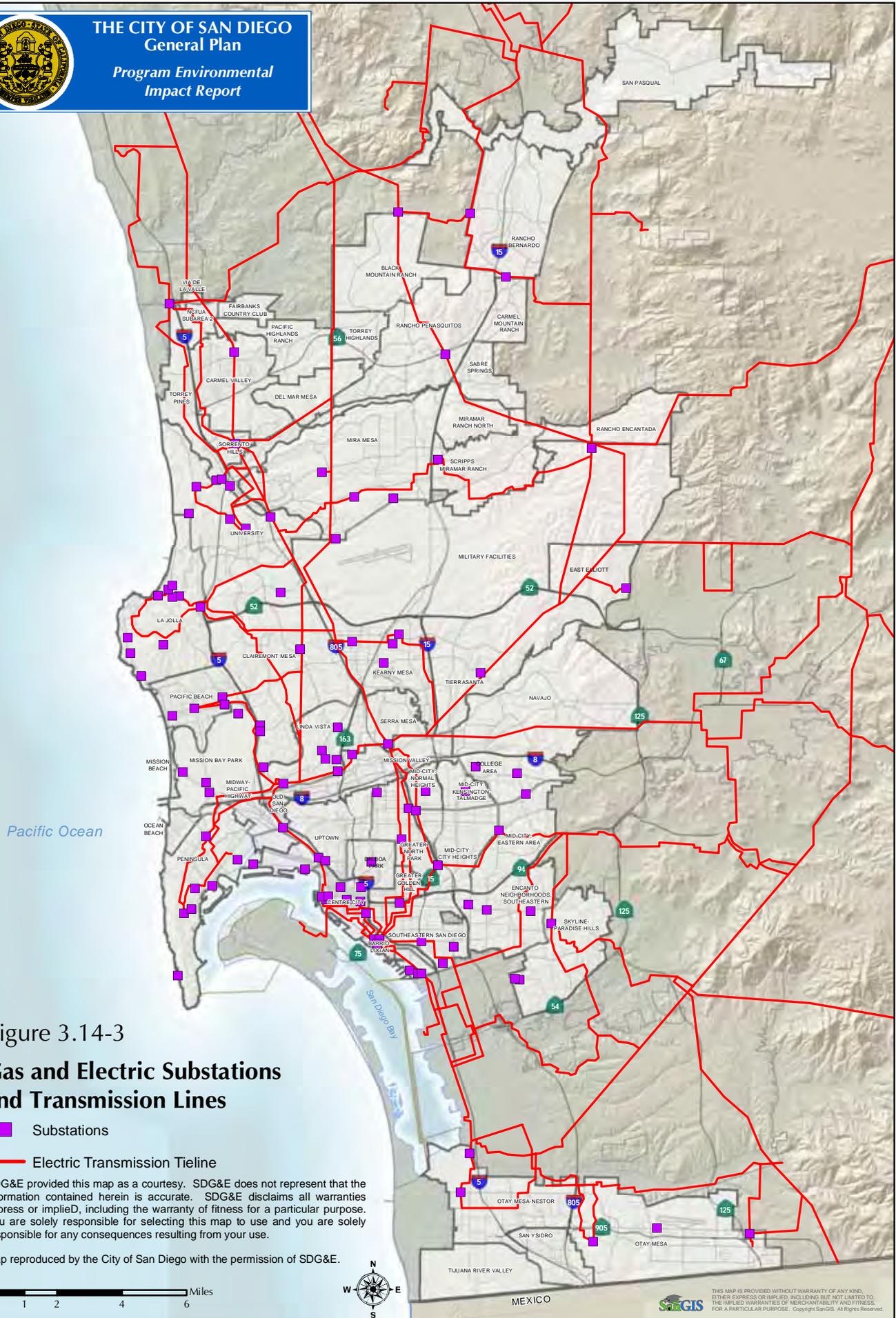
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3.15 TRANSPORTATION/TRAFFIC/CIRCULATION/PARKING

3.15.1 Existing Conditions

Transportation System

San Diego's transportation system provides for the movement of people and goods through a network of highways and roads, public transit, freight railroads, airports, seaports, and intermodal facilities. Local streets, paths and trails serve to provide local access and connections to the regional network. The transportation system provides travel for residents, employees, visitors, and goods movement and creates a system that supports City and regional economic needs. To accommodate the various travel needs, the City's transportation network includes numerous modes of transportation.

Roadways

Roadways are categorized into the following street classifications and functions:

Freeway: A street that is designed to carry through traffic, and is fully access controlled by grade separations, interchanges, and ramp connections. It normally is maintained by the California State Department of Transportation (Caltrans) and is constructed to state criteria, and varies in width from four to eight or more lanes.

Prime Arterial: A street that primarily provides a network connecting vehicles and transit to other primary arterials and to the freeway system. It carries heavy vehicular movement while providing low pedestrian movement and moderate bicycle and transit movements. It has a raised center median, bicycle lanes, street trees, traffic safety street lighting, sidewalks, and no access from abutting property. It may include underground utilities.

Major Arterial: A street that primarily provides a network connecting vehicles and transit to other major arterials and primary arterials, and to the freeway system and secondarily providing access to abutting commercial and industrial property. It carries moderate-to-heavy vehicular movement, low-to-high pedestrian and bicycle movements, and moderate-to-high transit movement. It has a raised center median, street trees, traffic safety, street lighting, and sidewalks, and may include landscaping, pedestrian-scale lighting, underground utilities, on-street parking, and/or bike lanes.

Collector Street: A street that primarily provides movement between local/collector streets and streets of higher classification and, secondarily, provides access to abutting property. It carries low- to moderate-vehicular movement, low- to heavy-pedestrian movement, moderate- to heavy-bicycle movement, and low- to moderate-transit movement. It has on-street parking, street trees, traffic safety street lighting, and sidewalks. It may also include landscaping, pedestrian-scale lighting, and underground utilities.

Local Street: A street that provides, primarily, direct access to abutting property. It carries low vehicular movement, low- to heavy-pedestrian movement, and low- to moderate-bicycle

movement. It has on-street parking, street trees, traffic safety street lighting, and sidewalks. It may include landscaping, pedestrian-scale lighting, and underground utilities.

Bikeways

Bikeways can be classified into four types in accordance with the Caltrans Highway Design Manual:

- Class I Bike Path – Typically called a bike path, this provides for bicycle travel on a paved right-of way completely separated from any street or highway.
- Class II Bike Lane – These facilities are often referred to as bike lanes. Bike lanes provide a striped and stenciled lane for one-way travel on a street or highway. When properly designed, bike lanes help improve the visibility of bicyclists.
- Class III Bike Route – Generally referred to as a bike route, it provides for shared use with pedestrian or motor vehicle traffic and is identified only by signing. This is recommended when there is enough right-of-way for bicyclists and motorists to safely pass.
- Shared Roadway (No Bikeway Designation). Most bicycle travel in the state now occurs on streets and highways without bikeway designations. This probably will be true in the future as well. In some instances, entire street systems may be fully adequate for safe and efficient bicycle travel and signing and striping for bicycle use may be unnecessary.

The City of San Diego has a developed network of designated Class I, II, and III bikeways.

Figure 3.15-1 shows the existing network of designated bikeways within the City. Many Class I paths are located in Mission Valley, Mission Bay Park, and along the beachfronts in Pacific Beach and Mission Beach. Other Class I facilities of significant length can be found in Carmel Valley, Rancho Peñasquitos, Mira Mesa, Rose Canyon, near the San Diego Airport, and in the Mission Trails Park. In San Diego, many Class I bikeways provide critical links between communities that would otherwise be totally separated for bicyclists. Two examples of these critical links are the Rose Canyon and Murphy Canyon paths, which provide for convenient bicycle travel in areas with no other alternative route adjacent to busy freeways.

Most of the Class II bike lane facilities are located in areas of the City developed within the last 30 years and include Rancho Bernardo, Rancho Peñasquitos, Sabre Springs, Mira Mesa, University City, Carmel Valley, and Tierrasanta. Some important Class II bikeways of significant length include Genesee Avenue, Linda Vista, Kearny Villa, and Black Mountain Roads, Aero and Harbor Drives, Friars and Mission Gorge Roads, Nimitz and Beyer Boulevards, and Carmel Mountain, Torrey Pines, and Otay Mesa Roads.

Class III bikeways are located both along major arterials and along quiet neighborhood streets. Arterial Class III facilities are located along such streets as Miramar Road, Rancho Peñasquitos Boulevard, Pacific Highway, 4th, 5th, and 6th Avenues, Camino Ruiz, and Saturn and Del Sol Boulevards. Neighborhood Class III routes are located along streets such as Orange Avenue in City Heights, Gold Coast Drive in Mira Mesa, Fort Stockton Drive in Mission Hills, Hornblend Avenue in Pacific Beach, L Street near Golden Hill, and Iris Avenue in Otay Mesa-Nestor.

The City of San Diego is committed to supporting bicycling as a form of mobility and recreation. As part of the City's long-term vision contained in the General Plan, the City supports the

planning and development of bicycle-friendly development projects, streets, and neighborhoods for both commuter and recreational riders. To this end, the City has adopted a citywide Bicycle Master Plan (BMP).

Development, maintenance, and support of the bicycle network are guided by the City's BMP (San Diego 2002). It identifies existing and future needs, and provides specific recommendations for facilities and programs over the next 20 years. The BMP contains detailed policies, action items, and network maps, and addresses issues such as bikeway planning, community involvement, facility design, bikeway classifications, multimodal integration, safety and education, and support facilities. The BMP is intended to provide a citywide perspective that is enhanced with more detailed community plan level recommendations and refinements. The BMP also identifies specific bicycling programs and addresses network implementation, maintenance and funding strategies.

Transit

Transit services are provided both for trips within the City and region and for trips between San Diego and adjacent areas. The current transit network includes local and express bus, light rail (trolley), and Coaster commuter rail services.

Within the San Diego region, transit services are provided by the Metropolitan Transit System (MTS) in the southern metropolitan area (including the City of San Diego) and the North County Transit District (NCTD) in the northern part of the county (with Coaster and bus services that tie into the City of San Diego). Ferry service (privately operated) also is available between San Diego and Coronado. In addition, there are demand-responsive transit services that provide transit service in sparsely traveled areas and for travelers with special needs that cannot be well served by fixed-route service.

Figure 3.15-2 shows existing transit service with connections in the City of San Diego, including the adopted MTS 2006 Comprehensive Operational Analysis transit network of higher frequency transit lines and the Regional Transportation Plan (RTP) network. Higher frequency bus and trolley service represents the urban network of single routes traveling on key corridors every 15 minutes or better. The RTP identifies light rail, local and express bus, and Bus Rapid Transit (BRT) projects that would improve operations of existing services.

Passenger Rail

The Coaster and [LI] Amtrak trains provide passenger rail service to the City of San Diego along the coastal rail corridor. Passenger and freight trains also share the predominately single-track corridor. The Coaster provides commuter rail service between Oceanside and Downtown San Diego with stations in the City at Sorrento Valley, Old Town, and the Santa Fe Depot. Amtrak provides intercity passenger rail service from Downtown San Diego to Los Angeles, and north to San Luis Obispo, which is the second most heavily traveled intercity passenger rail corridor in the nation.

The Regional Transportation Plan identifies projects that would provide improved rail service and performance, and would enable service frequency improvements for commuter and intercity passenger rail services. Specific projects include: double tracking of the coastal rail corridor and a tunnel under University City (including a new station), and service frequency improvements.

Goods Movement

Goods movement in the San Diego region is provided via truck travel on the region's roadway systems as well as by air, rail, and seaport. Lindbergh Field serves as the primary airport for the movement of the goods transported by air. Freight rail service within the San Diego region is provided via the BNSF and SDIV railroads with Carrizo Gorge Railway operating between Tijuana and Tecate, Baja California. The region's seaport at Tenth Avenue in San Diego and National City is located on San Diego Bay and is operated by the San Diego Unified Port District.

Approximately 2.5 million tons of maritime cargo is handled annually. Inbound cargoes include refrigerated commodities, fertilizer, cement, break bulk commodities, and forest products such as newsprint. Main export cargoes include refrigerated cargo; break bulk; and bulk commodities such as soda ash, sodium sulfate, and borax. In the past four years, bulk tonnage has steadily increased from 157,000 to 744,000 metric tons annually (SANDAG 2004).

The San Diego & Arizona Eastern (SD&AE) Railway connects San Diego to Tijuana and Tecate in Baja California. The SDIV Railroad provides freight service between San Diego and San Ysidro. In 2001, Carrizo Gorge Railway took over operations between Tijuana and Tecate. Main commodities moved include liquefied petroleum gas, lumber, beverages, paper, grain, and sand. The extension of existing freight service between San Diego and Tecate to the Imperial Valley is being considered by rehabilitating the 70-mile Desert Line portion of the SD&AE, which has been out of service since 1983. In May 2002, MTDB granted a contract to Carrizo Gorge Railway to repair, operate, and maintain the Desert Line. The connection with the Union Pacific Railroad in Imperial Valley would link San Diego and its port to the rest of the United States and Mexico, and vastly improve the region's market opportunities.

Figure 3.15-3 represents a compilation of the RTP network and the circulation systems identified in the City's adopted community plans. Community plans provide finer level of street system details.

Regional Transportation Model

The SANDAG Series 10 Transportation Regional Model is the tool that all cities within the San Diego region use to forecast future traffic volumes and estimate the traffic effects of changes in land use and roadway facilities. The traffic model produces separate assignments of travel throughout the day and during peak hours. The model is also used to compare existing transportation conditions (Year 2005) to future conditions (Year 2030). Different modes of travel can also be extracted from the model such as the number of trips traveling in carpool lanes, driving alone, taking transit trips, riding a bike or walking.

SANDAG's Transportation Model was used to obtain information to determine potential impacts to the transportation system due to implementation of the Draft General Plan (SANDAG 2030). The Model projected future roadway miles Level of Service, vehicle miles traveled, and trips taken by different modes of transportation for Year 2030.

The Transportation Model is based on the long-range population, housing, and employment projections of the preliminary 2030 Cities/County Forecast. This forecast assumes that the region will encourage more and smarter growth development over time. Within the City limits, the City of Villages Opportunity Areas Map (adopted as Appendix A to the Strategic Framework Action Plan 2002) was incorporated into the methodology used in determining locations for potential additional residential development, but only in locations where adopted community plans allow for mixed-use and multifamily development.

The model optimizes the performance of the roadway and public transit system through smart land use planning, increased transit options, increased system and demand management, and additional infrastructure to accommodate the future growth. The infrastructure improvements include freeway, interchange, transit, bicycle and other projects funded through a 42 billion dollar “Reasonably Expected Revenue Scenario.” The model reflects a land use and transportation system that:

- Provides connectivity within the network to accommodate all modes of travel.
- Connects transit to frequented destinations.
- Improves accessibility.
- Places higher density land uses along transit corridors.
- Increases opportunities for alternative modes of transportation (i.e., carpool lanes, transit connections).
- Enhances the roadway network.

Existing (Year 2005) Performance Measures

Level of Service

Level of Service (LOS) is a measure of operational conditions within a traffic stream. It relates to delay in traffic flow, generally measured in terms of speed and travel time, freedom to maneuver, traffic interruption, driver comfort, and convenience.

The LOS for the roadway segment is measured using a volume-to-capacity (v/c) ratio. The volume to capacity ratio is a conventional level of service measure, which equates roadway demand to supply. Demand is expressed by roadway volume, and supply is expressed as the carrying capacity of a roadway. The LOS is categorized into six levels, A through F, with LOS A representing the best possible condition and LOS F representing the worst. **Table 3.15-1** provides the general description of each level of service as it relates to the flow of traffic. **Figure 3.15-1** shows existing LOS for regional serving roadways within the City.

Table 3.15-1
Roadway Level of Service

Level of Service	General Description
A	Primarily free-flow operations. Vehicles are completely unimpeded in their ability to maneuver within the traffic stream. Control delay at signalized intersections is minimal.
B	Reasonably unimpeded operations. The ability to maneuver within the traffic stream is only slightly restricted, and control delays at signalized intersections are not significant.
C	Stable operations; however, ability to maneuver and change lanes in midblock locations may be more restricted than at LOS B, and longer queues, adverse signal coordination, or both may contribute to lower average travel speeds.
D	Borders on a range in which small increases in flow may cause substantial increases in delay. LOS D may be due to adverse signal progression, inappropriate signal timing, high volumes, or a combination of these factors.
E	Characterized by significant delays. Such operations are caused by a combination of adverse progression, high signal density, high volumes, extensive delays at critical intersections, and inappropriate signal timing.
F	Characterized by urban street flow at extremely low speeds. Intersection congestion is likely at critical signalized locations, with high delays, high volumes and extensive queuing.

Source: 2000 Highway Capacity Manual

Existing Roadway Miles LOS

The standard for acceptable LOS on existing roadways within the City of San Diego is LOS D with the exception of the Downtown community with an acceptable LOS E. **Table 3.15-2** summarizes the performance measure results of the existing freeways and classified roadways within the City of San Diego. As shown on **Table 3.15-2**, approximately 26 percent of the roadways within the City of San Diego are currently operating at LOS E or F.

Table 3.15-2
Citywide Existing Roadway Miles

Level of Service	% of Roadway Miles
A	28%
B	20%
C	16%
D	10%
E	9%
F	17%

Source: SANDAG Series 10, Year 2005 Regional Transportation Model

Existing Vehicle Mile Travel (VMT)

Vehicle Miles Traveled is a measure that identifies the number of miles motorists travel on the roadway network. Measuring the percent of daily vehicle miles traveled at a LOS E or F identifies the total number of miles motorists will travel under congested conditions throughout the day.

It is estimated that over 35 million daily vehicle miles are traveled everyday on streets and freeways within the City of San Diego (2005). Approximately 20 million of these vehicle miles (57 percent) currently occur at Level of Service E or F as shown on **Table 3.15-3**.

Table 3.15-3
Citywide Existing Vehicle Miles Traveled (VMT)

Level Of Service	VMT on Roadway Network
A	1,610,215 (4%)
B	3,358,636 (10%)
C	4,828,820 (14%)
D	5,320,205 (15%)
E	6,126,363 (18%)
F	13,770,030 (39%)
Total	35,014,269 (100%)

Source: SANDAG Series 10, Year 2005 Regional Transportation Model

Existing Alternative Modes of Travel

The amount of travel on each mode of transportation can be measured by taking the number of trips using that particular mode, and comparing it with the total trips in the transportation system. This will measure the trips traveled by mode for all trip purposes compared with all other trips traveled either by the peak periods of the day or throughout the day. **Table 3.15-4** indicates the percent of trips for each mode for all trip purposes during the peak hours and throughout the day.

Table 3.15-4
Citywide Existing Percent of Travel Mode for All Trip Purposes

Time Period	Mode	Total Percent By Mode
Peak *	Total Auto:	86.7%
	Drive Alone	59.5%
	Carpool	27.1%
	Total Transit	2.6%
	Bike & Walk	10.8%
Daily	Total Auto:	87.6%
	Drive Alone	56.3%
	Carpool	31.3%
	Total Transit	1.7%
	Bike & Walk	10.7%

Source: SANDAG Series 10, Year 2005 Regional Transportation Model

* 6:00 AM to 9:00 AM & 3:00 PM to 6:00 PM

As shown on **Table 3.15-4**, currently 86.7 percent of total peak hour trips are auto trips. The remaining of peak hour trips are 2.6 percent of transit and 10.8 percent of bike and walking trips. The auto trips can be broken down as: 59.5 percent drive alone, and 27.1 percent carpool.

Existing Home-to-Work Trips

Home-to-work trips are considered commuting trips and are typically made during the peak hours. A closer look at home-to-work trips is a good measure of travel most often taken by motorists on a daily basis during the week. **Table 3.15-5** summarizes the percentage of home-to-work trips by travel mode during the peak period. As shown on **Table 3.15-5**, approximately 78.8 percent of the trips are driving alone, 12.2 percent are carpooling, 5.6 percent are taking transit, and 3.4 percent are biking or walking to work.

Table 3.15-5
Citywide Existing Percent of Peak Hour Home-to-Work Travel by Mode*

Mode	Total Percent By Mode
Total Auto:	91.0%
Drive Alone	78.8%
Carpool	12.2%
Total Transit	5.6%
Bike & Walk	3.4%

Source: SANDAG Series 10, Year 2005 Regional Transportation Model

* 6:00AM to 9:00AM & 3:00 PM to 6:00 PM

Focused Transit Investment Areas

Citywide comparisons of transit and automobile use provide only partial understanding of the role of each mode in a comprehensive mobility system. The street and freeway system extends to all developed areas within the City and is available for use 24 hours a day, seven days a week. In contrast, transit investments are typically focused in specific areas. When transit investments are made in urban core areas with transit-supportive land uses and densities, higher frequency, all day local and express transit services can be more efficiently provided and transit mode shares can be expected to be significantly higher than the citywide figures shown on **Table 3.15-5**. For areas without transit-supportive land uses, transit investment is often limited to a few key travel corridors, along with limited peak commuter services, resulting in minimal transit mode shares. Thus, the citywide mode shares comparisons on **Table 3.15-5** dilute the significance of transit's contributions to the mobility system by spreading out transit trips over times and areas that transit was not designed to serve. In order to gain information on the role of transit in areas where significant transit investments have been made or are planned, data from three focused areas were analyzed in PEIR **Section 3.15.5**. The areas studied included the College Area, University, and Uptown communities.

Existing Parking Supply/Demand

Parking demand and parking needs vary from community to community depending on land use and geographic location. The City uses parking programs based on the parking needs of each individual community (or area). Such parking programs include residential permit programs, Community Parking Districts (CPD), time-limited parking regulations, angled parking, and others.

There are currently CPDs established in Downtown, Uptown, and Mid-City. Council Policy 100-18 (San Diego 2004 A) provides for a CPD to retain 45 percent of the parking meter revenues collected within its boundaries. These funds are to be used for improvements and activities that increase the availability, supply and effective use of parking to residents, visitors, and employees within the area in which the meters are located. Funds may be used for parking supply, signage, marketing, promoting alternative forms of transportation to reduce parking demand (e.g., community shuttles, public transit, bicycling, and walking), and other uses such as landscaping and security.

Most current community plans contain goals and policies that specifically provide for adequate parking. The existing parking provisions common to most community plans include:

1. Provide an adequate, accessible, and well-maintained supply of parking for residents, businesses, and tourists.
2. Provide adequate off-street parking for vehicles in all community projects.
3. Require new development to provide parking and address pedestrian activity in site design proposals.
4. Prohibit the elimination of existing parking.

The City's Land Development Code (LDC) contains citywide parking regulations designed to "work together to accommodate a multi modal transportation system." The intent of the regulations is to "provide for a safe and efficient transportation system . . . , to reduce traffic congestion and improve air quality; and to reasonably accommodate the peak parking needs of development, balanced by the needs of pedestrians, bicyclists, and transit users and by the preservation of community character." The LDC parking regulations include parking ratios by land use, transit area parking reductions, shared parking provisions, tandem parking provisions, motorcycle parking requirements, and bicycle parking requirements. In Transit Areas, parking standards are reduced by about 15 percent for most multiple dwelling units and commercial uses located in transit areas. Transit Areas are identified in **Map No. C-921**. The Transit Area parking reductions were first implemented in 1987. In 2001, updates to the Transit Areas Map were adopted, and then later repealed by the City Council due to community dissatisfaction with parking reductions. In addition, the MTS adopted and began to implement comprehensive changes in transit services in 2006 which are not reflected on the Transit Areas Map.

The City has also adopted Planned District Ordinance regulations that address parking requirements in specific communities, and a Parking Impact Overlay Zone to increase off-street parking requirements for specified coastal, beach, and campus areas that have parking impacts.

Regulatory Framework

State and Federal Requirements

The Transportation Equity Act for the 21st Century (TEA-21), signed into law in 1998, provides the regulatory framework at the federal level for transportation planning in urban areas. This legislation requires that Metropolitan Planning Organizations (MPO) prepare long-range transportation plans. In federally designated air quality nonattainment and maintenance areas, the long-range transportation plan is to be updated every three years. The state of California has additional regulations for the preparation of long-range transportation plans.

Regional Plans

SANDAG is the region's transportation and planning agency. The City of San Diego participates in the development and adoption of SANDAG documents and programs through the votes of our elected officials serving on the SANDAG Board of Directors, staff participation on SANDAG advisory committees, and direct citizen participation in the process. Key regional planning efforts include the:

Regional Transportation Plan (RTP) - SANDAG, the MPO for the San Diego region, adopted the MOBILITY 2030 RTP in 2003 in compliance with state and federal regulations. The MOBILITY 2030 plan was developed around four main components: land use, system development, system management, and demand management. The plan includes new and better connections to more efficiently move people on buses, trolleys, trains, and cars. It establishes the basis for state funding of local and regional transportation projects, and is a prerequisite for federal funding. SANDAG prioritizes and allocates the expenditure of regional, state, and federal transportation funds to implement RTP projects. In 2006, the 2030 Revenue Constrained RTP was updated, and in 2007, SANDAG began a comprehensive RTP update.

Regional Transit Vision (RTV) - The RTV is a component of the RTP. The goal of the RTV is to make public transit competitive with solo driving during peak periods. Local jurisdictions play a significant role in creating communities that support the RTV. Two key concepts of the RTV are: 1) Integrating transit into the more populated urban communities and 2) Surrounding public transit with supportive land uses. The RTV also promotes priority measures that will allow transit to bypass congested roadways and intersections. The 2007 update of the RTP will include a review of the region's transit strategy, using information gained from an Independent Transit Planning Review, and other sources.

Short Range Transit Plan (SRTP) - The SRTP strategy is to balance the short-term needs associated with managing existing transit services, while implementing the long-term regional transit vision identified in MOBILITY 2030. The SRTP provides a framework for transit system development over a five-year period. SANDAG is responsible for regional transit planning, programming, and construction. The MTS and NCTD are responsible for the detailed transit routing and operations.

Congestion Management Plan (CMP) - The CMP focuses on two main activities: 1) addressing existing congestion through regular roadway monitoring and determining ways to streamline

traffic flow, and 2) identifying and mitigating future congestion resulting from new development. SANDAG, Caltrans, and local jurisdictions implement the CMP through two means. The first is through the adoption of deficiency plans. The plans are developed through the cooperation of SANDAG, Caltrans, and the local jurisdictions. These plans identify the cause of congestion, potential solutions, and establish funding mechanisms for improvements that help manage congestion. The second way is through enhanced CEQA review. Local jurisdictions must conduct enhanced CEQA review for large development projects, a process which identified potential congestion problems on a regional level and finds ways to minimize these problems.

Community Plans

The City has over fifty planning areas. As part of community plan updates, land use and street network alternatives are analyzed using transportation models and software to estimate traffic generation, forecast traffic volumes and evaluate levels of service on the transportation system for each alternative. Adopted community plans specify the planned system of classified streets within the local community.

3.15.2 Thresholds of Significance

A significant impact could occur if implementation of the Draft General Plan:

- Increases the number of roadway miles at a Level of Service E or F on the planned transportation network;
- Increases the percent of daily vehicle miles traveled at a Level of Service E or F on the planned circulation system;
- Decreases the percent of multimodal trips in the City’s transportation system; or
- Creates an average demand for parking that substantially exceeds the available supply.

3.15.3 Impact Analysis

SANDAG’s Transportation Model was used to obtain information to determine potential impacts to the transportation system due to implementation of the Draft General Plan along with regional transportation plans. The Model projected roadway miles Level of Service (LOS), Vehicle Miles Traveled (VMT), and trips taken by different modes of transportation for Year 2005 and Year 2030. As seen in the following tables, vehicular travel is expected to increase, yet congestion is expected to decrease. This reduction in congestion is attributed to implementation of SANDAG’s MOBILITY 2030 plan along with the land use recommendations in the Regional Comprehensive Plan (RCP) (see EIR **Section 3.8**).

SANDAG’s MOBILITY 2030 Plan estimates that approximately 42 billion dollars of improvements will be made to the regional transportation system through Year 2030. Regional improvements include transit, managed/HOV lanes, highway, local roads, transportation demand management, land use, bicycle/pedestrian, and other related efforts. Revenue sources for the planned improvements are “reasonably expected” to come from state, federal, TransNet and local revenue sources. “Reasonably expected” includes revenue sources that are available today and will continue as revenue along with additional revenues expected to become available through 2030.

Figures 3.15-5 and 3.15-6 show the Year 2006 and Year 2030 transportation systems respectively.

Could the implementation of the Draft General Plan increase the number of roadway miles at Level of Service E or F on the planned transportation network?

Future Roadway Miles LOS

Table 3.15-6 compares roadway miles for each level of service from Year 2005 (considered existing conditions) to Year 2030. As shown on the table, the percent of roadway miles that will experience LOS E and F conditions is projected to decrease, meaning that there will be fewer congested areas in the future than there are under existing conditions. More specifically, the miles of roadways projected to operate at LOS E and LOS F decrease from approximately 26 percent (Year 2005) to 18 percent (Year 2030). These improvements are attributed to the implementation of the MOBILITY 2030 plan and RCP as discussed above. **Figure 3.15-7** shows the forecasted 2030 LOS for regional serving roadways within the City.

**Table 3.15-6
Comparison of Citywide Roadway Miles
Year 2005 vs. Year 2030**

Level of Service	Year 2005 Roadway Miles	Year 2030 Roadway Miles
A	368 (28%)	419 (30%)
B	267 (20%)	288 (21%)
C	218 (16%)	255 (19%)
D	130 (10%)	167 (12%)
E	118 (9%)	139 (10%)
F	221 (17%)	115 (8%)

Source: SANDAG Series 10, Year 2030 Regional Transportation Model

The Draft General Plan has policies that call for the City to increase capacity and reduce congestion on the street and freeway system, and to work with SANDAG to implement the City's priorities for transportation improvements. While the SANDAG Transportation Model forecasts that roadway LOS conditions will improve by the Year 2030, there are many uncertainties associated with the multi-year implementation of the Draft General Plan and regional transportation plans that could result in traffic impacts at various points in time. Potential for traffic impact exists due to possible changes in the availability of funding sources, specific project approval or construction delays, transportation infrastructure design changes, and new development projects that require new or different facilities.

In addition, a major update to the MOBILITY 2030 RTP is underway which could result in adoption of different strategies and projects that are unknown at this time. As a result, it is infeasible at this Program EIR level to provide specific mitigation that would reduce impacts to a less than significant level. As such, there is potential for significant unavoidable impacts related to transportation. For these reasons, at the Program EIR level, impacts to traffic LOS are considered significant and unavoidable. Future environmental analysis would be required for any future projects (i.e., the RTP update, community plan updates, private development projects, and CIP projects); identification of project-specific mitigation measures would be determined at that time.

Could implementation of the Draft General Plan increase the percent of daily vehicle miles traveled at a Level of Service E or F on the planned circulation system?

As the region continues to grow, the population inevitably will increase along with an increase in vehicular travel. That is reflected on **Table 3.15-7** which shows approximately 35 million Vehicle Miles Traveled (VMT) daily in Year 2005 compared with approximately 43 million VMT in Year 2030.

However, the percent of vehicle miles traveled which will experience congestion will improve throughout the network. The percentage of vehicle miles traveled at a LOS E or F is expected to decrease from 57 percent to 39 percent between 2005 and 2030.

**Table 3.15-7
Comparison of Citywide VMT
Year 2030 vs. Year 2005**

Level of Service	Year 2005 VMT	Year 2030 VMT
A	1,601,215 (4%)	2,234,114 (5%)
B	3,358,636 (10%)	5,328,563 (12%)
C	4,828,820 (14%)	10,088,428 (24%)
D	5,320,205 (15%)	8,724,623 (20%)
E	6,126,363 (18%)	9,708,444 (23%)
F	13,770,030 (39%)	6,830,203 (16%)
Total	35,014,269 (100%)	42,914,375 (100%)

Source: SANDAG Series 10, Year 2030 Regional Transportation Model

This improvement can be contributed to a number of factors mentioned earlier. The robust roadway and transit network planned through 2030, the smart growth approach to land use, improved access, and increased opportunities for walking and cycling is expected to result in alternative modes becoming more heavily used.

The Draft General Plan has policies that call for the City to increase capacity and reduce congestion on the street and freeway system, and to work with SANDAG to implement the City's priorities for transportation improvements. The SANDAG Transportation Model forecasts that daily vehicle miles traveled at LOS E or F should decrease by the Year 2030. However, there are many uncertainties associated with the multi-year implementation of the Draft General Plan and regional transportation plans that could result in traffic impacts occurring at various points in time. Uncertainties include potential changes in the availability of funding sources, project approval or construction delays, transportation infrastructure design changes and new development projects that require new or different facilities.

In addition, a major update to the MOBILITY 2030 RTP is underway which could result in the adoption of different strategies and projects that are unknown at this time. As a result, it is infeasible at this Program EIR level to provide specific mitigation that would reduce impacts to a less than significant level. As such, there is potential for significant unavoidable impacts related to transportation. For these reasons, at the Program EIR level, impacts to traffic LOS are

considered significant and unavoidable. Environmental analysis would be required for any future projects (i.e., the RTP update, community plan updates, private development projects, and CIP projects); identification of project-specific mitigation measures would be determined at that time.

Could the implementation of the Draft General Plan decrease the percent of multimodal trips in the City's transportation system?

The Draft General Plan Mobility Element and SANDAG's MOBILITY 2030 plan all highlight the importance of integrating transportation and land use planning decisions, and using multimodal strategies to reduce congestion and increase travel choices. Giving people travel choices distributes trips throughout the transportation system and provides alternatives to driving alone, such as carpooling, transit, biking or walking.

The percent of trips taken by carpools and transit is expected to increase, though the percent of trips taken by biking and walking is expected to decrease as compared in relation to the other modes of travel in Year 2030. This decrease can be partially explained by limitations of the SANDAG Model. The Model does a good job of forecasting regional vehicular trips, but is not well suited to measuring local pedestrian and bicycle trips that are influenced by factors such as the quality of the urban environment, the connectivity of the bicycle and pedestrian path system, and the availability of local goods and services. However, the projected number of biking and walking trips, is expected to increase when compared to the existing level of biking and walking by 11 percent and 14 percent respectively in Year 2030 in both the peak periods and throughout the day per the SANDAG Model. **Tables 3.15-8** and **3.15-9** indicate the daily and peak period percent of trips for each mode. The tables also identify the actual number of trips for each mode for existing conditions and for future conditions.

In summary these tables show that:

- Transit trips are expected to increase from Year 2005 to Year 2030 in both the peak periods and throughout the day.
 - Existing citywide peak period transit trips is 2.6 percent of all peak period trips and is expected to increase to 4.9 percent in Year 2030. This is an increase of approximately 112,700 new transit trips in the City by Year 2030 compared with Year 2005, a net 130 percent increase as shown on **Table 3.15-8**.
 - Current daily transit trips are 1.7 percent of all trips citywide and are expected to increase to 3.2 percent in Year 2030. This is an increase of 202,000 (net 131 percent per **Table 3.15-9**) of new transit trips in the City by Year 2030 compared with Year 2005.
- Carpool trips are expected to increase from Year 2005 to Year 2030 in both the peak periods and throughout the day.
 - Currently approximately 27.1 percent of trips during the peak hours are taken in the carpool lane. This is expected to increase to 28.0 percent in Year 2030. This is a net increase in number of carpool trips, approximately 226,400 which is a 25 percent net increase in Year 2030 as shown on **Table 3.15-8**.
 - Currently approximately 31.3 percent of daily trips are taken in the carpool lane and is expected to increase to 31.9 percent. This is a net increase in number of carpool

- trips, approximately 685,500 which is a 24 percent net increase in Year 2030 as shown on **Table 3.15-9**.
- Biking and walking trips percentage is expected to decrease as compared in relation to the other modes of travel in Year 2030 (see the discussion on Model limitations provided above). However, the projected number of biking and walking trips is expected to increase in Year 2030 when compared to the existing level of biking and walking in both the peak periods and throughout the day.
 - Existing citywide peak period biking and walking trips are 10.8 percent of all peak period trips and are expected to decrease to 9.9 percent by Year 2030, even though there is a net increase in number of biking and walking trips, approximately 40,200 which is an 11 percent net increase in Year 2030 as shown on **Table 3.15-8**.
 - Currently approximately 10.7 percent of daily trips are biking and walking trips and are expected to decrease to 9.9 percent, even though there is a net increase in number of biking and walking trips, approximately 133,000 which is a 14 percent net increase in Year 2030 as shown on **Table 3.15-9**.

***Table 3.15-8**
Comparison of Citywide Peak Period Travel Mode for All Trips Purposes
Year 2030 vs. Year 2005

Measure	Year 2005 % Of Total Person Trips	Year 2030 % Of Total Person Trips	Year 2005 Person Trips	Year 2030 Person Trips	Net % Person Trips Increase From Year 2005 To Year 2030
Drive Alone Auto	59.5%	57.2%	2,017,498	2,340,884	16%
Carpool	27.1%	28.0%	920,801	1,147,225	25%
Transit	2.6%	4.9%	86,801	199,498	130%
Bike & Walk	10.8%	9.9%	367,428	407,623	11[L4]%
Total	100.0%	100.0%	3,392,528	4,095,230	21%

Source: SANDAG Series 10, Year 2030 Regional Transportation Model

* 6:00 a.m. to 9:00 a.m. and 3:00 p.m. to 6:00 p.m.

Table 3.15-9
Comparison of Citywide Daily Travel Mode for All Trip Purposes
Year 2030 vs. Year 2005

Measure	Year 2005 % of total Person Trips	Year 2030 % of total Person Trips	Year 2005 Person Trips	Year 2030 Person Trips	Net % Person Trips Increase from Year 2005 to Year 2030
Drive Alone Auto	56.3%	55.0%	5,092,928	6,089,102	19%
Carpool	31.3%	31.9%	2,842,337	3,527,821	24%
Transit	1.7%	3.2%	153,880	355,460	131%
Bike & Walk	10.7%	9.9%	964,889	1,097,828	14%
Total	100.0%	100.0%	9,054,034	11,070,211	22%

Source: SANDAG Series 10, Year 2030 Regional Transportation Model

Citywide Home-to-Work Peak Hour Trips:

As mentioned earlier, home-to-work trips are considered commuting trips and are typically taken during the peak period. A closer look at home-to-work trips on **Table 3.15-10** indicates that the percent of trips taken by carpool and transit is expected to increase in Year 2030, Though the percent of trips taken by biking and walking is expected to decrease as compared in relation to the other modes of travel, the projected number of biking and walking trips is expected to increase when compared to the existing level of biking and walking by six percent in Year 2030 during the peak periods per the SANDAG Model:

- Transit trips are expected to increase from existing conditions to Year 2030 in the peak periods. Existing citywide peak period transit trips are 5.6 percent of all peak period trips and are expected to increase to 11.5 percent in Year 2030. This is an increase of approximately 66,300 (134 percent net increase as shown on **Table 3.15-10**) of new transit trips in the City by Year 2030 compared with Year 2005.
- Carpool trips are expected to increase from existing conditions to Year 2030 in the peak periods. Currently approximately 12.2 percent of trips during the peak hours are taken in

the carpool lane. This is expected to increase to 12.4 percent in Year 2030. This is an increase of approximately 18,200 trips using the carpool lanes.

- Biking and walking trips are expected to decrease as compared in relation to the other modes of travel in Year 2030. However, the projected number of biking and walking trips is expected to increase in Year 2030 when compared to the existing level of biking and walking in the peak periods. Existing citywide home-to-work peak period biking and walking trips are 3.4 percent and are expected to decrease to 3.1 percent in Year 2030, even though there is a net increase in number of biking and walking trips, approximately 1,750 which is a six percent net increase in Year 2030 as shown on **Table 3.15-10**.

***Table 3.15-10**
Comparison of Citywide Home-to-work Peak Period Travel Mode
Year 2030 vs. Year 2005

Measure	Year 2005 % Of Total Person Trips	Year 2030 % Of Total Person Trips	Year 2005 Person Trips	Year 2030 Person Trips	Net % Person Trips Increase From Year 2005 To Year 2030
Drive Alone Auto	78.8%	73.0%	690,548	736,697	7%
Carpool	12.2%	12.4%	106,587	124,785	17%
Transit	5.6%	11.5%	49,380	115,707	134%
Bike & Walk	3.4%	3.1%	30,085	31,883	6%
Total	100.0%	100.0%	876,600	1,009,072	15%

*6:00 a.m. to 9:00 a.m. and 3:00 p.m. to 6:00 p.m.

Focused Transit Investment Areas

Citywide comparisons of transit and automobile use provide only partial understanding of the role of each mode in a comprehensive mobility system. The street and freeway system extends to all developed areas within the City and is available for use 24 hours a day, seven days a week. In contrast, transit investments are typically focused in specific areas to increase the capacity and accessibility of the transportation system, and transit services are usually programmed to offer their highest levels of service during peak commute hours with service dropping off in times of lower demand. Citywide mode split comparisons dilute the significance of transit's contributions to the mobility system by spreading out transit trips over times and areas that transit was not designed to serve.

In order to gain information on the role of transit in areas where significant transit investments have been made or are planned, data from the College Area, University, and Uptown communities was compiled as a part of the impact analysis. This data is derived from the same Transportation Model that was used to report on citywide impacts; a subset of the citywide data was collected by focusing in on smaller subareas.

College Area Community

A substantial investment in transit services have been made in the College Area through the extension of San Diego Trolley services and the ongoing operation of a bus/trolley transit center at San Diego State University (SDSU). While higher-quality transit services do not exist throughout

the entire community, the core, higher intensity areas are well-served. Note that Year 2005 conditions do not include the Trolley extension to SDSU. The MOBILITY 2030 plan identifies the El Cajon Boulevard Bus Rapid Transit project, which would connect SDSU to Downtown San Diego via College Ave/El Cajon Blvd/Park Blvd. Bus Rapid Transit services are also planned in the I-15 corridor, providing connections from the area to job centers to the north. This BRT service will be accessed via the El Cajon Blvd BRT service and local buses in the University Ave corridor.

Table 3.15-11 compares Year 2030 and Year 2005 peak period, home-to-work trips by travel mode in the College Area community. Key findings include:

- Transit trips are expected to increase from 6.2 percent to 17 percent of all peak period trips. This is an increase of approximately 203 percent (or 2,300 trips).
- Drive alone auto trips decrease from 77 percent to 68.5 percent of total peak hour trips.
- Bike and walk trips decrease from 4.6 percent to 3.5 percent of all peak period trips.

At 17 percent, the College Area has a higher projected transit mode split (home-to-work transit ridership during the peak hours) than the 11.5 percent citywide transit mode split shown on **Table 3.15-10**.

***Table 3.15-11**
Comparison of College Area Community
Home-to-work Peak Period Travel Mode
Year 2030 vs. Year 2005

Measure	Year 2005 % Of Total Person Trips	Year 2030 % Of Total Person Trips	Year 2005 Person Trips	Year 2030 Person Trips	Net % Person Trips Increase From Year 2005 To Year 2030
Drive Alone Auto	77.0%	68.5%	14,040	13,734	-2%
Carpool	12.2%	11.0%	2,225	2,203	-1%
Transit	6.2%	17.0%	1,126	3,409	203%
Bike & Walk	4.6%	3.5%	840	697	-17%
Total	100.0%	100.0%	18,231	20,043	10%

* 6:00 a.m. to 9:00 a.m. and 3:00 p.m. to 6:00 p.m.

University Community

The University community is currently served by local bus, express bus, and shuttle services. A transit center exists at the University Towne Center Shopping Center. Major Year 2030 transit service improvements planned for this area include:

- The Mid Coast trolley line extension from Old Town Transit Center to the University of California, San Diego (UCSD) and University City;
- The Nobel Coaster Station;
- Bus Rapid Transit services along the I-805 corridor connecting South Bay, Mid-City, and East County with the University City area; and

- The “Super Loop” shuttle, which is a higher-speed, limited-stop shuttle connecting residential and employment areas within the University City and UCSD communities.

Table 3.15-12 compares Year 2030 and Year 2005 peak period, home-to-work trips by travel mode in the University Community. Key findings include:

- Transit trips are expected to increase from 2.5 percent to 13.6 percent of all peak period trips. This is an increase of approximately 517 percent (or 12,400 trips).
- Drive alone auto trips decrease from 82.3 percent to 71.6 percent of all peak hour trips.
- Bike and walk trips decrease from 2.9 percent to 2.4 percent of all peak period trips.

At 13.6 percent, the University area has a higher projected transit mode split (home-to-work transit ridership during the peak hours) than the 11.5 percent citywide transit mode split shown on **Table 3.15-10**.

***Table 3.15-12**
Comparison of University Community
Home-to-work Peak Period Travel Mode
Year 2030 vs. Year 2005

Measure	Year 2005 % Of Total Person Trips	Year 2030 % Of Total Person Trips	Year 2005 Person Trips	Year 2030 Person Trips	Net % Person Trips Increase From Year 2005 To Year 2030
Drive Alone Auto	82.3%	71.6%	79,810	77,739	-2.6%
Carpool	12.3%	12.3%	11,963	13,324	11%
Transit	2.5%	13.6%	2,397	14,785	517%
Bike & Walk	2.9%	2.4%	2,805	2,678	-4.5%
Total	100.0%	100.0%	96,976	108,526	12%

* 6:00 a.m. to 9:00 a.m. and 3:00 p.m. to 6:00 p.m.

Uptown Community

The Uptown Community is currently served by some of the region’s most frequent local bus services. The MOBILITY 2030 plan shows introduction of Bus Rapid Transit service using along the 4th/5th Avenue corridor linking Uptown with Downtown and Mission Valley.

Table 3.15-13 compares Year 2030 and Year 2005 peak period, home-to-work trips by travel mode in the Uptown Community. Key findings include:

- Transit trips are expected to increase from 10.5 percent to 17.7 percent of all peak period trips. This is an increase of approximately 90 percent (or 3,700 trips).
- Drive alone auto trips decrease from 71 percent to 64.8 percent of all peak hour trips, a three percent decrease.
- Bike and walk trips decrease from 7.3 percent to 6.7 percent of all peak period trips, a four percent decrease.

At 17.7 percent, the Uptown area has a higher projected transit mode split (home-to-work transit ridership during the peak hours) than the 11.5 percent citywide transit mode split shown on **Table 3.15-10**.

***Table 3.15-13**
Comparison of Uptown Community
Home-to-work Peak Period Travel Mode
Year 2030 vs. Year 2005

Measure	Year 2005 % Of Total Person Trips	Year 2030 % Of Total Person Trips	Year 2005 Person Trips	Year 2030 Person Trips	Net % Person Trips Increase From Year 2005 To Year 2030
Drive Alone Auto	71.0%	64.8%	28,185	28,901	3%
Carpool	11.2%	10.7%	4,450	4,784	8%
Transit	10.5%	17.7%	4,164	7,890	90%
Bike & Walk	7.3%	6.7%	2,891	3,013	4%
Total	100.0%	100.0%	39,690	44,588	12%

* 6:00 a.m. to 9:00 a.m. and 3:00 p.m. to 6:00 p.m.

A major focus of the Draft General Plan is to create more walkable and transit-oriented communities. Policies in the Mobility Element address the need for multimodal system investments, an interconnected street and path system, for implementation of traffic calming and transit priority measures, for improved transit services, and for development of a Pedestrian Master Plan. Urban Design Element policies provide guidance on how to design pedestrian-transit-oriented development, and the Land Use Element calls for development of mixed-use, walkable village centers in areas served by the transit system.

The Draft General Plan has policies that call for the City to work with SANDAG to implement the City's General Plan policies and priorities for transportation improvements. Implementation of the Draft General Plan would support SANDAG's Smart Growth Concept Map, which would allow the City to compete for Smart Growth Incentive Funds that could be used for multimodal transportation improvements. The SANDAG Transportation Model forecasts that transit trips will increase, but shows a decrease in pedestrian and bicycle trips (see discussion on Model limitations provided above). The decrease in pedestrian and bicycle trips is a significant impact. However, there are many uncertainties associated with the multi-year implementation of the Draft General Plan and regional transportation plans that could result in the achievement of mode splits that differ from what has been projected. Uncertainties include potential changes in the availability of funding sources, project approval or construction delays, transportation infrastructure design changes due to environmental impacts, new studies or information that result in design changes, and new development projects that require new or different facilities.

In addition, a major update to the MOBILITY 2030 plan is underway which could result in the adoption of different strategies and projects that are unknown at this time. As a result, it is infeasible at this Program EIR level to provide specific mitigation that would reduce impacts to a less than significant level. As such, there is potential for significant unavoidable impacts related to multimodal transportation. For these reasons, at the Program EIR level, impacts to the multimodal trips are considered significant and unavoidable. Environmental analysis would be

required for any future projects (i.e., the RTP update, community plan updates, private development projects, and CIP projects); identification of project-specific mitigation measures would be determined at that time.

Could implementation of the proposed General Plan create an average demand for parking that could substantially exceed the available supply?

As infill development occurs there will likely be increase impacts to neighborhood traffic and parking. Parking management solutions will need to be more complex and tailored to meet varying situations. The Draft General Plan seeks to create conditions that will reduce the demand for parking, and the space devoted to the automobile, through factors including: mixed-use development; comfortable, attractive sidewalks; multiple and direct pedestrian street connections; high quality transit service; improved bicycle facilities; and use of parking management tools.

The parking needs of new development would be provided in accordance with the City's Land Development Regulations, including use of shared parking and Transit Area parking reductions (discussed in Section 13.15.1) where applicable. Solutions for parking problems that currently exist, or that would be exacerbated by the projected increased in population growth in the City and region, would be addressed using a mix of parking supply, management, and demand solutions. The Mobility Element, **Table ME-3**, Parking Strategies Toolbox, contains a menu of options that may be tailored for specific applications as needed.

While there are Draft General Plan policies and existing regulations that are designed to minimize parking impacts, there may still be localized parking impacts in the future. Therefore, at the Program EIR level, impacts to parking are considered significant and unavoidable. Environmental analysis would be required for any future projects (i.e., community plan updates, redevelopment plans, private development projects, and CIP projects); identification of project-specific mitigation measures would be determined at that time.

3.15.4 Mitigation Framework

Goals, policies, and recommendations enacted by the City combined with existing regulations described above provide a framework for developing project level protection measures for future discretionary projects which may increase traffic congestion, decrease multimodal trips, or create a demand for parking that substantially exceeds the available supply. The City's process for evaluation of discretionary projects includes environmental review and documentation pursuant to CEQA as well as an analysis of those projects for consistency with the goals, policies and recommendations of the General Plan and the applicable community plan. In general, implementation of the above policies and compliance with established regulations would minimize impacts. Compliance with regulations is required of all projects and is not considered to be mitigation. However, it is possible that for certain projects, adherence to regulations may not adequately address traffic and parking impacts and such projects would require additional measures to avoid or reduce significant impacts. These additional measures would be considered mitigation.

For each future discretionary project requiring mitigation (i.e., measures that go beyond what is required by existing regulations), project-specific measures will be identified that reduce significant project-level impacts to less than significant, or the project level impact may remain significant and unavoidable where no feasible mitigation exists. Where mitigation is determined to be necessary and feasible, these measures will be included in a Mitigation Monitoring and Reporting Program (MMRP) for the project. Future development is to be designed to avoid or mitigate significant impacts by using appropriate measures designed to achieve the factors listed below.

Walkable Communities – (see Draft General Plan policies ME-A.1 thru ME-A-~~9~~¹⁰ for the policy foundation):

- A safe and comfortable pedestrian environment.
- A complete, functional, and interconnected pedestrian network, that is accessible to pedestrians of all abilities.
- Greater walkability achieved through pedestrian friendly street, site and building design.
- Walking as a viable travel choice, particularly for trips of less than one-half mile.

Street and Freeway System – (see Draft General Plan policies ME-C.1 thru ME-C.10 for the policy foundation):

- A street and freeway system that balances the needs of multiple users of the public right-of-way.
- An interconnected street system that provides multiple linkages within and between communities.
- Safe and efficient street design that minimizes environmental and neighborhood impacts.
- Vehicle congestion relief.
- **Well maintained streets.**

Transportation Demand Management (TDM) – (see Draft General Plan policies ME-E.1 thru ME-E.8 for the policy foundation):

- Reduced single-occupant vehicular traffic on congested streets and freeways.
- Improved performance and efficiency of the street and freeway system, by means other than roadway widening or construction (although roadway widening or construction may still be required).
- Expanded travel options and improved personal mobility.
- Project related bicycling support infrastructure such as safe and secure bike storage, and showers and lockers for bicyclists.

Bicycling – (see Draft General Plan policies ME-F.1 thru ME-F.6 for the policy foundation):

- Bicycling as a viable travel choice, particularly for trips of less than five miles.
- Project-specific components of safe and comprehensive local and regional bikeway network.
- Environmental quality, public health and mobility benefits through increased bicycling.

Parking Management – (see Draft General Plan policies ME-G.1 thru ME-G.5 for the policy foundation):

- Parking that is reasonably available when and where it is needed through management of the supply.
- Solutions to project-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.
- Increased land use efficiencies in the provision of parking.

The Mitigation Framework may be updated, expanded and refined when applied to specific future projects based on project-specific design and changes in existing conditions, and local, state and federal laws.

3.15.5 Significance of Impact with Mitigation Framework

At this time, no specific projects have been proposed, and therefore it is not possible to propose feasible mitigation measures to reduce project-level impacts. It is infeasible in this Program level EIR to provide specific mitigation that would reduce impacts to a less than significant level. As such, significant unavoidable impacts related to transportation/traffic/circulation/parking remain.

[J5] Notes and References

City of San Diego.

- 1997 Municipal Code, Chapter 13, Article 2, Division 8: Parking Impact Overlay Zone Regulations.
- 2000 Municipal Code, Chapter 14, Article 2, Division 5: Parking Regulations.
- 2001 Municipal Code, Chapter 13, Article 2, Division 9: Residential Tandem Parking Overlay Zone.
- 2002 *Bicycle Master Plan*. May 2002.
- 2004 Council Policy 100-18. *Community Parking District Policy*. November 15, 2004.
- 2004 Manager's Report. *Analysis of Parking Task Force Recommendations*. No. 04-133. Land Use and Housing Committee. Agenda of June 16, 2004.
- 2005 Manager's Report. *Community Parking Districts*. No. 05-100. Land Use and Housing Committee. Agenda of April 20, 2005.

SANDAG.

- 2006 Revenue Constrained *Regional Transportation Plan: Update 2006*. February 2006.

3.15 TRANSPORTATION/TRAFFIC/CIRCULATION/PARKING

3.15.1 Existing Conditions

Transportation System

San Diego's transportation system provides for the movement of people and goods through a network of highways and roads, public transit, freight railroads, airports, seaports, and intermodal facilities. Local streets, paths and trails serve to provide local access and connections to the regional network. The transportation system provides travel for residents, employees, visitors, and goods movement and creates a system that supports City and regional economic needs. To accommodate the various travel needs, the City's transportation network includes numerous modes of transportation.

Roadways

Roadways are categorized into the following street classifications and functions:

Freeway: A street that is designed to carry through traffic, and is fully access controlled by grade separations, interchanges, and ramp connections. It normally is maintained by the California State Department of Transportation (Caltrans) and is constructed to state criteria, and varies in width from four to eight or more lanes.

Prime Arterial: A street that primarily provides a network connecting vehicles and transit to other primary arterials and to the freeway system. It carries heavy vehicular movement while providing low pedestrian movement and moderate bicycle and transit movements. It has a raised center median, bicycle lanes, street trees, traffic safety street lighting, sidewalks, and no access from abutting property. It may include underground utilities.

Major Arterial: A street that primarily provides a network connecting vehicles and transit to other major arterials and primary arterials, and to the freeway system and secondarily providing access to abutting commercial and industrial property. It carries moderate-to-heavy vehicular movement, low-to-high pedestrian and bicycle movements, and moderate-to-high transit movement. It has a raised center median, street trees, traffic safety, street lighting, and sidewalks, and may include landscaping, pedestrian-scale lighting, underground utilities, on-street parking, and/or bike lanes.

Collector Street: A street that primarily provides movement between local/collector streets and streets of higher classification and, secondarily, provides access to abutting property. It carries low- to moderate-vehicular movement, low- to heavy-pedestrian movement, moderate- to heavy-bicycle movement, and low- to moderate-transit movement. It has on-street parking, street trees, traffic safety street lighting, and sidewalks. It may also include landscaping, pedestrian-scale lighting, and underground utilities.

Local Street: A street that provides, primarily, direct access to abutting property. It carries low vehicular movement, low- to heavy-pedestrian movement, and low- to moderate-bicycle

movement. It has on-street parking, street trees, traffic safety street lighting, and sidewalks. It may include landscaping, pedestrian-scale lighting, and underground utilities.

Bikeways

Bikeways can be classified into four types in accordance with the Caltrans Highway Design Manual:

- Class I Bike Path – Typically called a bike path, this provides for bicycle travel on a paved right-of way completely separated from any street or highway.
- Class II Bike Lane – These facilities are often referred to as bike lanes. Bike lanes provide a striped and stenciled lane for one-way travel on a street or highway. When properly designed, bike lanes help improve the visibility of bicyclists.
- Class III Bike Route – Generally referred to as a bike route, it provides for shared use with pedestrian or motor vehicle traffic and is identified only by signing. This is recommended when there is enough right-of-way for bicyclists and motorists to safely pass.
- Shared Roadway (No Bikeway Designation). Most bicycle travel in the state now occurs on streets and highways without bikeway designations. This probably will be true in the future as well. In some instances, entire street systems may be fully adequate for safe and efficient bicycle travel and signing and striping for bicycle use may be unnecessary.

The City of San Diego has a developed network of designated Class I, II, and III bikeways.

Figure 3.15-1 shows the existing network of designated bikeways within the City. Many Class I paths are located in Mission Valley, Mission Bay Park, and along the beachfronts in Pacific Beach and Mission Beach. Other Class I facilities of significant length can be found in Carmel Valley, Rancho Peñasquitos, Mira Mesa, Rose Canyon, near the San Diego Airport, and in the Mission Trails Park. In San Diego, many Class I bikeways provide critical links between communities that would otherwise be totally separated for bicyclists. Two examples of these critical links are the Rose Canyon and Murphy Canyon paths, which provide for convenient bicycle travel in areas with no other alternative route adjacent to busy freeways.

Most of the Class II bike lane facilities are located in areas of the City developed within the last 30 years and include Rancho Bernardo, Rancho Peñasquitos, Sabre Springs, Mira Mesa, University City, Carmel Valley, and Tierrasanta. Some important Class II bikeways of significant length include Genesee Avenue, Linda Vista, Kearny Villa, and Black Mountain Roads, Aero and Harbor Drives, Friars and Mission Gorge Roads, Nimitz and Beyer Boulevards, and Carmel Mountain, Torrey Pines, and Otay Mesa Roads.

Class III bikeways are located both along major arterials and along quiet neighborhood streets. Arterial Class III facilities are located along such streets as Miramar Road, Rancho Peñasquitos Boulevard, Pacific Highway, 4th, 5th, and 6th Avenues, Camino Ruiz, and Saturn and Del Sol Boulevards. Neighborhood Class III routes are located along streets such as Orange Avenue in City Heights, Gold Coast Drive in Mira Mesa, Fort Stockton Drive in Mission Hills, Hornblend Avenue in Pacific Beach, L Street near Golden Hill, and Iris Avenue in Otay Mesa-Nestor.

The City of San Diego is committed to supporting bicycling as a form of mobility and recreation. As part of the City's long-term vision contained in the General Plan, the City supports the

planning and development of bicycle-friendly development projects, streets, and neighborhoods for both commuter and recreational riders. To this end, the City has adopted a citywide Bicycle Master Plan (BMP).

Development, maintenance, and support of the bicycle network are guided by the City's BMP (San Diego 2002). It identifies existing and future needs, and provides specific recommendations for facilities and programs over the next 20 years. The BMP contains detailed policies, action items, and network maps, and addresses issues such as bikeway planning, community involvement, facility design, bikeway classifications, multimodal integration, safety and education, and support facilities. The BMP is intended to provide a citywide perspective that is enhanced with more detailed community plan level recommendations and refinements. The BMP also identifies specific bicycling programs and addresses network implementation, maintenance and funding strategies.

Transit

Transit services are provided both for trips within the City and region and for trips between San Diego and adjacent areas. The current transit network includes local and express bus, light rail (trolley), and Coaster commuter rail services.

Within the San Diego region, transit services are provided by the Metropolitan Transit System (MTS) in the southern metropolitan area (including the City of San Diego) and the North County Transit District (NCTD) in the northern part of the county (with Coaster and bus services that tie into the City of San Diego). Ferry service (privately operated) also is available between San Diego and Coronado. In addition, there are demand-responsive transit services that provide transit service in sparsely traveled areas and for travelers with special needs that cannot be well served by fixed-route service.

Figure 3.15-2 shows existing transit service with connections in the City of San Diego, including the adopted MTS 2006 Comprehensive Operational Analysis transit network of higher frequency transit lines and the Regional Transportation Plan (RTP) network. Higher frequency bus and trolley service represents the urban network of single routes traveling on key corridors every 15 minutes or better. The RTP identifies light rail, local and express bus, and Bus Rapid Transit (BRT) projects that would improve operations of existing services.

Passenger Rail

The Coaster and [LI1](#) Amtrak trains provide passenger rail service to the City of San Diego along the coastal rail corridor. Passenger and freight trains also share the predominately single-track corridor. The Coaster provides commuter rail service between Oceanside and Downtown San Diego with stations in the City at Sorrento Valley, Old Town, and the Santa Fe Depot. Amtrak provides intercity passenger rail service from Downtown San Diego to Los Angeles, and north to San Luis Obispo, which is the second most heavily traveled intercity passenger rail corridor in the nation.

The Regional Transportation Plan identifies projects that would provide improved rail service and performance, and would enable service frequency improvements for commuter and intercity passenger rail services. Specific projects include: double tracking of the coastal rail corridor and a tunnel under University City (including a new station), and service frequency improvements.

Goods Movement

Goods movement in the San Diego region is provided via truck travel on the region's roadway systems as well as by air, rail, and seaport. Lindbergh Field serves as the primary airport for the movement of the goods transported by air. Freight rail service within the San Diego region is provided via the BNSF and SDIV railroads with Carrizo Gorge Railway operating between Tijuana and Tecate, Baja California. The region's seaport at Tenth Avenue in San Diego and National City is located on San Diego Bay and is operated by the San Diego Unified Port District.

Approximately 2.5 million tons of maritime cargo is handled annually. Inbound cargoes include refrigerated commodities, fertilizer, cement, break bulk commodities, and forest products such as newsprint. Main export cargoes include refrigerated cargo; break bulk; and bulk commodities such as soda ash, sodium sulfate, and borax. In the past four years, bulk tonnage has steadily increased from 157,000 to 744,000 metric tons annually (SANDAG 2004).

The San Diego & Arizona Eastern (SD&AE) Railway connects San Diego to Tijuana and Tecate in Baja California. The SDIV Railroad provides freight service between San Diego and San Ysidro. In 2001, Carrizo Gorge Railway took over operations between Tijuana and Tecate. Main commodities moved include liquefied petroleum gas, lumber, beverages, paper, grain, and sand. The extension of existing freight service between San Diego and Tecate to the Imperial Valley is being considered by rehabilitating the 70-mile Desert Line portion of the SD&AE, which has been out of service since 1983. In May 2002, MTDB granted a contract to Carrizo Gorge Railway to repair, operate, and maintain the Desert Line. The connection with the Union Pacific Railroad in Imperial Valley would link San Diego and its port to the rest of the United States and Mexico, and vastly improve the region's market opportunities.

Figure 3.15-3 represents a compilation of the RTP network and the circulation systems identified in the City's adopted community plans. Community plans provide finer level of street system details.

Regional Transportation Model

The SANDAG Series 10 Transportation Regional Model is the tool that all cities within the San Diego region use to forecast future traffic volumes and estimate the traffic effects of changes in land use and roadway facilities. The traffic model produces separate assignments of travel throughout the day and during peak hours. The model is also used to compare existing transportation conditions (Year 2005) to future conditions (Year 2030). Different modes of travel can also be extracted from the model such as the number of trips traveling in carpool lanes, driving alone, taking transit trips, riding a bike or walking.

SANDAG's Transportation Model was used to obtain information to determine potential impacts to the transportation system due to implementation of the Draft General Plan (SANDAG 2030). The Model projected future roadway miles Level of Service, vehicle miles traveled, and trips taken by different modes of transportation for Year 2030.

The Transportation Model is based on the long-range population, housing, and employment projections of the preliminary 2030 Cities/County Forecast. This forecast assumes that the region will encourage more and smarter growth development over time. Within the City limits, the City of Villages Opportunity Areas Map (adopted as Appendix A to the Strategic Framework Action Plan 2002) was incorporated into the methodology used in determining locations for potential additional residential development, but only in locations where adopted community plans allow for mixed-use and multifamily development.

The model optimizes the performance of the roadway and public transit system through smart land use planning, increased transit options, increased system and demand management, and additional infrastructure to accommodate the future growth. The infrastructure improvements include freeway, interchange, transit, bicycle and other projects funded through a 42 billion dollar “Reasonably Expected Revenue Scenario.” The model reflects a land use and transportation system that:

- Provides connectivity within the network to accommodate all modes of travel.
- Connects transit to frequented destinations.
- Improves accessibility.
- Places higher density land uses along transit corridors.
- Increases opportunities for alternative modes of transportation (i.e., carpool lanes, transit connections).
- Enhances the roadway network.

Existing (Year 2005) Performance Measures

Level of Service

Level of Service (LOS) is a measure of operational conditions within a traffic stream. It relates to delay in traffic flow, generally measured in terms of speed and travel time, freedom to maneuver, traffic interruption, driver comfort, and convenience.

The LOS for the roadway segment is measured using a volume-to-capacity (v/c) ratio. The volume to capacity ratio is a conventional level of service measure, which equates roadway demand to supply. Demand is expressed by roadway volume, and supply is expressed as the carrying capacity of a roadway. The LOS is categorized into six levels, A through F, with LOS A representing the best possible condition and LOS F representing the worst. **Table 3.15-1** provides the general description of each level of service as it relates to the flow of traffic. **Figure 3.15-1** shows existing LOS for regional serving roadways within the City.

**Table 3.15-1
Roadway Level of Service**

Level of Service	General Description
A	Primarily free-flow operations. Vehicles are completely unimpeded in their ability to maneuver within the traffic stream. Control delay at signalized intersections is minimal.
B	Reasonably unimpeded operations. The ability to maneuver within the traffic stream is only slightly restricted, and control delays at signalized intersections are not significant.
C	Stable operations; however, ability to maneuver and change lanes in midblock locations may be more restricted than at LOS B, and longer queues, adverse signal coordination, or both may contribute to lower average travel speeds.
D	Borders on a range in which small increases in flow may cause substantial increases in delay. LOS D may be due to adverse signal progression, inappropriate signal timing, high volumes, or a combination of these factors.
E	Characterized by significant delays. Such operations are caused by a combination of adverse progression, high signal density, high volumes, extensive delays at critical intersections, and inappropriate signal timing.
F	Characterized by urban street flow at extremely low speeds. Intersection congestion is likely at critical signalized locations, with high delays, high volumes and extensive queuing.

Source: 2000 Highway Capacity Manual

Existing Roadway Miles LOS

The standard for acceptable LOS on existing roadways within the City of San Diego is LOS D with the exception of the Downtown community with an acceptable LOS E. **Table 3.15-2** summarizes the performance measure results of the existing freeways and classified roadways within the City of San Diego. As shown on **Table 3.15-2**, approximately 26 percent of the roadways within the City of San Diego are currently operating at LOS E or F.

**Table 3.15-2
Citywide Existing Roadway Miles**

Level of Service	% of Roadway Miles
A	28%
B	20%
C	16%
D	10%
E	9%
F	17%

Source: SANDAG Series 10, Year 2005 Regional Transportation Model

Existing Vehicle Mile Travel (VMT)

Vehicle Miles Traveled is a measure that identifies the number of miles motorists travel on the roadway network. Measuring the percent of daily vehicle miles traveled at a LOS E or F identifies the total number of miles motorists will travel under congested conditions throughout the day.

It is estimated that over 35 million daily vehicle miles are traveled everyday on streets and freeways within the City of San Diego (2005). Approximately 20 million of these vehicle miles (57 percent) currently occur at Level of Service E or F as shown on **Table 3.15-3**.

Table 3.15-3
Citywide Existing Vehicle Miles Traveled (VMT)

Level Of Service	VMT on Roadway Network
A	1,610,215 (4%)
B	3,358,636 (10%)
C	4,828,820 (14%)
D	5,320,205 (15%)
E	6,126,363 (18%)
F	13,770,030 (39%)
Total	35,014,269 (100%)

Source: SANDAG Series 10, Year 2005 Regional Transportation Model

Existing Alternative Modes of Travel

The amount of travel on each mode of transportation can be measured by taking the number of trips using that particular mode, and comparing it with the total trips in the transportation system. This will measure the trips traveled by mode for all trip purposes compared with all other trips traveled either by the peak periods of the day or throughout the day. **Table 3.15-4** indicates the percent of trips for each mode for all trip purposes during the peak hours and throughout the day.

Table 3.15-4
Citywide Existing Percent of Travel Mode for All Trip Purposes

Time Period	Mode	Total Percent By Mode
Peak *	Total Auto:	86.7%
	Drive Alone	59.5%
	Carpool	27.1%
	Total Transit	2.6%
	Bike & Walk	10.8%
Daily	Total Auto:	87.6%
	Drive Alone	56.3%
	Carpool	31.3%
	Total Transit	1.7%
	Bike & Walk	10.7%

Source: SANDAG Series 10, Year 2005 Regional Transportation Model

* 6:00 AM to 9:00 AM & 3:00 PM to 6:00 PM

As shown on **Table 3.15-4**, currently 86.7 percent of total peak hour trips are auto trips. The remaining of peak hour trips are 2.6 percent of transit and 10.8 percent of bike and walking trips. The auto trips can be broken down as: 59.5 percent drive alone, and 27.1 percent carpool.

Existing Home-to-Work Trips

Home-to-work trips are considered commuting trips and are typically made during the peak hours. A closer look at home-to-work trips is a good measure of travel most often taken by motorists on a daily basis during the week. **Table 3.15-5** summarizes the percentage of home-to-work trips by travel mode during the peak period. As shown on **Table 3.15-5**, approximately 78.8 percent of the trips are driving alone, 12.2 percent are carpooling, 5.6 percent are taking transit, and 3.4 percent are biking or walking to work.

Table 3.15-5
Citywide Existing Percent of Peak Hour^[L2]*
Home-to-Work Travel Mode^[J3]

Mode	Total Percent By Mode
Total Auto:	91.0%
Drive Alone	78.8%
Carpool	12.2%
Total Transit	5.6%
Bike & Walk	3.4%

Source: SANDAG Series 10, Year 2005 Regional Transportation Model

* 6:00AM to 9:00AM & 3:00 PM to 6:00 PM

Focused Transit Investment Areas

Citywide comparisons of transit and automobile use provide only partial understanding of the role of each mode in a comprehensive mobility system. The street and freeway system extends to all developed areas within the City and is available for use 24 hours a day, seven days a week. In contrast, transit investments are typically focused in specific areas. When transit investments are made in urban core areas with transit-supportive land uses and densities, higher frequency, all day local and express transit services can be more efficiently provided and transit mode shares can be expected to be significantly higher than the citywide figures shown on **Table 3.15-5**. For areas without transit-supportive land uses, transit investment is often limited to a few key travel corridors, along with limited peak commuter services, resulting in minimal transit mode shares. Thus, the citywide mode shares comparisons on **Table 3.15-5** dilute the significance of transit's contributions to the mobility system by spreading out transit trips over times and areas that transit was not designed to serve. In order to gain information on the role of transit in areas where significant transit investments have been made or are planned, data from three focused areas were analyzed in PEIR **Section 3.15.5**. The areas studied included the College Area, University, and Uptown communities.

Existing Parking Supply/Demand

Parking demand and parking needs vary from community to community depending on land use and geographic location. The City uses parking programs based on the parking needs of each individual community (or area). Such parking programs include residential permit programs, Community Parking Districts (CPD), time-limited parking regulations, angled parking, and others.

There are currently CPDs established in Downtown, Uptown, and Mid-City. Council Policy 100-18 (San Diego 2004 A) provides for a CPD to retain 45 percent of the parking meter revenues collected within its boundaries. These funds are to be used for improvements and activities that increase the availability, supply and effective use of parking to residents, visitors, and employees within the area in which the meters are located. Funds may be used for parking supply, signage, marketing, promoting alternative forms of transportation to reduce parking demand (e.g., community shuttles, public transit, bicycling, and walking), and other uses such as landscaping and security.

Most current community plans contain goals and policies that specifically provide for adequate parking. The existing parking provisions common to most community plans include:

1. Provide an adequate, accessible, and well-maintained supply of parking for residents, businesses, and tourists.
2. Provide adequate off-street parking for vehicles in all community projects.
3. Require new development to provide parking and address pedestrian activity in site design proposals.
4. Prohibit the elimination of existing parking.

The City's Land Development Code (LDC) contains citywide parking regulations designed to "work together to accommodate a multi modal transportation system." The intent of the regulations is to "provide for a safe and efficient transportation system . . . , to reduce traffic congestion and improve air quality; and to reasonably accommodate the peak parking needs of development, balanced by the needs of pedestrians, bicyclists, and transit users and by the preservation of community character." The LDC parking regulations include parking ratios by land use, transit area parking reductions, shared parking provisions, tandem parking provisions, motorcycle parking requirements, and bicycle parking requirements. In Transit Areas, parking standards are reduced by about 15 percent for most multiple dwelling units and commercial uses located in transit areas. Transit Areas are identified in **Map No. C-921**. The Transit Area parking reductions were first implemented in 1987. In 2001, updates to the Transit Areas Map were adopted, and then later repealed by the City Council due to community dissatisfaction with parking reductions. In addition, the MTS adopted and began to implement comprehensive changes in transit services in 2006 which are not reflected on the Transit Areas Map.

The City has also adopted Planned District Ordinance regulations that address parking requirements in specific communities, and a Parking Impact Overlay Zone to increase off-street parking requirements for specified coastal, beach, and campus areas that have parking impacts.

Regulatory Framework

State and Federal Requirements

The Transportation Equity Act for the 21st Century (TEA-21), signed into law in 1998, provides the regulatory framework at the federal level for transportation planning in urban areas. This legislation requires that Metropolitan Planning Organizations (MPO) prepare long-range transportation plans. In federally designated air quality nonattainment and maintenance areas, the long-range transportation plan is to be updated every three years. The state of California has additional regulations for the preparation of long-range transportation plans.

Regional Plans

SANDAG is the region's transportation and planning agency. The City of San Diego participates in the development and adoption of SANDAG documents and programs through the votes of our elected officials serving on the SANDAG Board of Directors, staff participation on SANDAG advisory committees, and direct citizen participation in the process. Key regional planning efforts include the:

Regional Transportation Plan (RTP) - SANDAG, the MPO for the San Diego region, adopted the MOBILITY 2030 RTP in 2003 in compliance with state and federal regulations. The MOBILITY 2030 plan was developed around four main components: land use, system development, system management, and demand management. The plan includes new and better connections to more efficiently move people on buses, trolleys, trains, and cars. It establishes the basis for state funding of local and regional transportation projects, and is a prerequisite for federal funding. SANDAG prioritizes and allocates the expenditure of regional, state, and federal transportation funds to implement RTP projects. In 2006, the 2030 Revenue Constrained RTP was updated, and in 2007, SANDAG began a comprehensive RTP update.

Regional Transit Vision (RTV) - The RTV is a component of the RTP. The goal of the RTV is to make public transit competitive with solo driving during peak periods. Local jurisdictions play a significant role in creating communities that support the RTV. Two key concepts of the RTV are: 1) Integrating transit into the more populated urban communities and 2) Surrounding public transit with supportive land uses. The RTV also promotes priority measures that will allow transit to bypass congested roadways and intersections. The 2007 update of the RTP will include a review of the region's transit strategy, using information gained from an Independent Transit Planning Review, and other sources.

Short Range Transit Plan (SRTP) - The SRTP strategy is to balance the short-term needs associated with managing existing transit services, while implementing the long-term regional transit vision identified in MOBILITY 2030. The SRTP provides a framework for transit system development over a five-year period. SANDAG is responsible for regional transit planning, programming, and construction. The MTS and NCTD are responsible for the detailed transit routing and operations.

Congestion Management Plan (CMP) - The CMP focuses on two main activities: 1) addressing existing congestion through regular roadway monitoring and determining ways to streamline

traffic flow, and 2) identifying and mitigating future congestion resulting from new development. SANDAG, Caltrans, and local jurisdictions implement the CMP through two means. The first is through the adoption of deficiency plans. The plans are developed through the cooperation of SANDAG, Caltrans, and the local jurisdictions. These plans identify the cause of congestion, potential solutions, and establish funding mechanisms for improvements that help manage congestion. The second way is through enhanced CEQA review. Local jurisdictions must conduct enhanced CEQA review for large development projects, a process which identified potential congestion problems on a regional level and finds ways to minimize these problems.

Community Plans

The City has over fifty planning areas. As part of community plan updates, land use and street network alternatives are analyzed using transportation models and software to estimate traffic generation, forecast traffic volumes and evaluate levels of service on the transportation system for each alternative. Adopted community plans specify the planned system of classified streets within the local community.

3.15.2 Thresholds of Significance

A significant impact could occur if implementation of the Draft General Plan:

- Increases the number of roadway miles at a Level of Service E or F on the planned transportation network;
- Increases the percent of daily vehicle miles traveled at a Level of Service E or F on the planned circulation system;
- Decreases the percent of multimodal trips in the City’s transportation system; or
- Creates an average demand for parking that substantially exceeds the available supply.

3.15.3 Impact Analysis

SANDAG’s Transportation Model was used to obtain information to determine potential impacts to the transportation system due to implementation of the Draft General Plan along with regional transportation plans. The Model projected roadway miles Level of Service (LOS), Vehicle Miles Traveled (VMT), and trips taken by different modes of transportation for Year 2005 and Year 2030. As seen in the following tables, vehicular travel is expected to increase, yet congestion is expected to decrease. This reduction in congestion is attributed to implementation of SANDAG’s MOBILITY 2030 plan along with the land use recommendations in the Regional Comprehensive Plan (RCP) (see EIR **Section 3.8**).

SANDAG’s MOBILITY 2030 Plan estimates that approximately 42 billion dollars of improvements will be made to the regional transportation system through Year 2030. Regional improvements include transit, managed/HOV lanes, highway, local roads, transportation demand management, land use, bicycle/pedestrian, and other related efforts. Revenue sources for the planned improvements are “reasonably expected” to come from state, federal, TransNet and local revenue sources. “Reasonably expected” includes revenue sources that are available today and will continue as revenue along with additional revenues expected to become available through 2030.

Figures 3.15-5 and 3.15-6 show the Year 2006 and Year 2030 transportation systems respectively.

Could the implementation of the Draft General Plan increase the number of roadway miles at Level of Service E or F on the planned transportation network?

Future Roadway Miles LOS

Table 3.15-6 compares roadway miles for each level of service from Year 2005 (considered existing conditions) to Year 2030. As shown on the table, the percent of roadway miles that will experience LOS E and F conditions is projected to decrease, meaning that there will be fewer congested areas in the future than there are under existing conditions. More specifically, the miles of roadways projected to operate at LOS E and LOS F decrease from approximately 26 percent (Year 2005) to 18 percent (Year 2030). These improvements are attributed to the implementation of the MOBILITY 2030 plan and RCP as discussed above. **Figure 3.15-7** shows the forecasted 2030 LOS for regional serving roadways within the City.

Table 3.15-6
Comparison of Citywide Roadway Miles
Year 2005 vs. Year 2030

Level of Service	Year 2005 Roadway Miles	Year 2030 Roadway Miles
A	368 (28%)	419 (30%)
B	267 (20%)	288 (21%)
C	218 (16%)	255 (19%)
D	130 (10%)	167 (12%)
E	118 (9%)	139 (10%)
F	221 (17%)	115 (8%)

Source: SANDAG Series 10, Year 2030 Regional Transportation Model

The Draft General Plan has policies that call for the City to increase capacity and reduce congestion on the street and freeway system, and to work with SANDAG to implement the City's priorities for transportation improvements. While the SANDAG Transportation Model forecasts that roadway LOS conditions will improve by the Year 2030, there are many uncertainties associated with the multi-year implementation of the Draft General Plan and regional transportation plans that could result in traffic impacts at various points in time. Potential for traffic impact exists due to possible changes in the availability of funding sources, specific project approval or construction delays, transportation infrastructure design changes, and new development projects that require new or different facilities.

In addition, a major update to the MOBILITY 2030 RTP is underway which could result in adoption of different strategies and projects that are unknown at this time. As a result, it is infeasible at this Program EIR level to provide specific mitigation that would reduce impacts to a less than significant level. As such, there is potential for significant unavoidable impacts related to transportation. For these reasons, at the Program EIR level, impacts to traffic LOS are considered significant and unavoidable. Future environmental analysis would be required for any future projects (i.e., the RTP update, community plan updates, private development projects, and CIP projects); identification of project-specific mitigation measures would be determined at that time.

Could implementation of the Draft General Plan increase the percent of daily vehicle miles traveled at a Level of Service E or F on the planned circulation system?

As the region continues to grow, the population inevitably will increase along with an increase in vehicular travel. That is reflected on **Table 3.15-7** which shows approximately 35 million Vehicle Miles Traveled (VMT) daily in Year 2005 compared with approximately 43 million VMT in Year 2030.

However, the percent of vehicle miles traveled which will experience congestion will improve throughout the network. The percentage of vehicle miles traveled at a LOS E or F is expected to decrease from 57 percent to 39 percent between 2005 and 2030.

**Table 3.15-7
Comparison of Citywide VMT
Year 2030 vs. Year 2005**

Level of Service	Year 2005 VMT	Year 2030 VMT
A	1,601,215 (4%)	2,234,114 (5%)
B	3,358,636 (10%)	5,328,563 (12%)
C	4,828,820 (14%)	10,088,428 (24%)
D	5,320,205 (15%)	8,724,623 (20%)
E	6,126,363 (18%)	9,708,444 (23%)
F	13,770,030 (39%)	6,830,203 (16%)
Total	35,014,269 (100%)	42,914,375 (100%)

Source: SANDAG Series 10, Year 2030 Regional Transportation Model

This improvement can be contributed to a number of factors mentioned earlier. The robust roadway and transit network planned through 2030, the smart growth approach to land use, improved access, and increased opportunities for walking and cycling is expected to result in alternative modes becoming more heavily used.

The Draft General Plan has policies that call for the City to increase capacity and reduce congestion on the street and freeway system, and to work with SANDAG to implement the City's priorities for transportation improvements. The SANDAG Transportation Model forecasts that daily vehicle miles traveled at LOS E or F should decrease by the Year 2030. However, there are many uncertainties associated with the multi-year implementation of the Draft General Plan and regional transportation plans that could result in traffic impacts occurring at various points in time. Uncertainties include potential changes in the availability of funding sources, project approval or construction delays, transportation infrastructure design changes and new development projects that require new or different facilities.

In addition, a major update to the MOBILITY 2030 RTP is underway which could result in the adoption of different strategies and projects that are unknown at this time. As a result, it is infeasible at this Program EIR level to provide specific mitigation that would reduce impacts to a less than significant level. As such, there is potential for significant unavoidable impacts related to transportation. For these reasons, at the Program EIR level, impacts to traffic LOS are

considered significant and unavoidable. Environmental analysis would be required for any future projects (i.e., the RTP update, community plan updates, private development projects, and CIP projects); identification of project-specific mitigation measures would be determined at that time.

Could the implementation of the Draft General Plan decrease the percent of multimodal trips in the City's transportation system?

The Draft General Plan Mobility Element and SANDAG's MOBILITY 2030 plan all highlight the importance of integrating transportation and land use planning decisions, and using multimodal strategies to reduce congestion and increase travel choices. Giving people travel choices distributes trips throughout the transportation system and provides alternatives to driving alone, such as carpooling, transit, biking or walking.

The percent of trips taken by carpools and transit is expected to increase, though the percent of trips taken by biking and walking is expected to decrease as compared in relation to the other modes of travel in Year 2030. This decrease can be partially explained by limitations of the SANDAG Model. The Model does a good job of forecasting regional vehicular trips, but is not well suited to measuring local pedestrian and bicycle trips that are influenced by factors such as the quality of the urban environment, the connectivity of the bicycle and pedestrian path system, and the availability of local goods and services. However, the projected number of biking and walking trips, is expected to increase when compared to the existing level of biking and walking by 11 percent and 14 percent respectively in Year 2030 in both the peak periods and throughout the day per the SANDAG Model. **Tables 3.15-8** and **3.15-9** indicate the daily and peak period percent of trips for each mode. The tables also identify the actual number of trips for each mode for existing conditions and for future conditions.

In summary these tables show that:

- Transit trips are expected to increase from Year 2005 to Year 2030 in both the peak periods and throughout the day.
 - Existing citywide peak period transit trips is 2.6 percent of all peak period trips and is expected to increase to 4.9 percent in Year 2030. This is an increase of approximately 112,700 new transit trips in the City by Year 2030 compared with Year 2005, a net 130 percent increase as shown on **Table 3.15-8**.
 - Current daily transit trips are 1.7 percent of all trips citywide and are expected to increase to 3.2 percent in Year 2030. This is an increase of 202,000 (net 131 percent per **Table 3.15-9**) of new transit trips in the City by Year 2030 compared with Year 2005.
- Carpool trips are expected to increase from Year 2005 to Year 2030 in both the peak periods and throughout the day.
 - Currently approximately 27.1 percent of trips during the peak hours are taken in the carpool lane. This is expected to increase to 28.0 percent in Year 2030. This is a net increase in number of carpool trips, approximately 226,400 which is a 25 percent net increase in Year 2030 as shown on **Table 3.15-8**.
 - Currently approximately 31.3 percent of daily trips are taken in the carpool lane and is expected to increase to 31.9 percent. This is a net increase in number of carpool

- trips, approximately 685,500 which is a 24 percent net increase in Year 2030 as shown on **Table 3.15-9**.
- Biking and walking trips percentage is expected to decrease as compared in relation to the other modes of travel in Year 2030 (see the discussion on Model limitations provided above). However, the projected number of biking and walking trips is expected to increase in Year 2030 when compared to the existing level of biking and walking in both the peak periods and throughout the day.
 - Existing citywide peak period biking and walking trips are 10.8 percent of all peak period trips and are expected to decrease to 9.9 percent by Year 2030, even though there is a net increase in number of biking and walking trips, approximately 40,200 which is an 11 percent net increase in Year 2030 as shown on **Table 3.15-8**.
 - Currently approximately 10.7 percent of daily trips are biking and walking trips and are expected to decrease to 9.9 percent, even though there is a net increase in number of biking and walking trips, approximately 133,000 which is a 14 percent net increase in Year 2030 as shown on **Table 3.15-9**.

***Table 3.15-8**
Comparison of Citywide Peak Period Travel Mode for All Trips Purposes
Year 2030 vs. Year 2005

Measure	Year 2005 % Of Total Person Trips	Year 2030 % Of Total Person Trips	Year 2005 Person Trips	Year 2030 Person Trips	Net % Person Trips Increase From Year 2005 To Year 2030
Drive Alone Auto	59.5%	57.2%	2,017,498	2,340,884	16%
Carpool	27.1%	28.0%	920,801	1,147,225	25%
Transit	2.6%	4.9%	86,801	199,498	130%
Bike & Walk	10.8%	9.9%	367,428	407,623	11[L4]%
Total	100.0%	100.0%	3,392,528	4,095,230	21%

Source: SANDAG Series 10, Year 2030 Regional Transportation Model

* 6:00 a.m. to 9:00 a.m. and 3:00 p.m. to 6:00 p.m.

Table 3.15-9
Comparison of Citywide Daily Travel Mode for All Trip Purposes
Year 2030 vs. Year 2005

Measure	Year 2005 % of total Person Trips	Year 2030 % of total Person Trips	Year 2005 Person Trips	Year 2030 Person Trips	Net % Person Trips Increase from Year 2005 to Year 2030
Drive Alone Auto	56.3%	55.0%	5,092,928	6,089,102	19%
Carpool	31.3%	31.9%	2,842,337	3,527,821	24%
Transit	1.7%	3.2%	153,880	355,460	131%
Bike & Walk	10.7%	9.9%	964,889	1,097,828	14%
Total	100.0%	100.0%	9,054,034	11,070,211	22%

Source: SANDAG Series 10, Year 2030 Regional Transportation Model

Citywide Home-to-Work Peak Hour Trips:

As mentioned earlier, home-to-work trips are considered commuting trips and are typically taken during the peak period. A closer look at home-to-work trips on **Table 3.15-10** indicates that the percent of trips taken by carpool and transit is expected to increase in Year 2030, Though the percent of trips taken by biking and walking is expected to decrease as compared in relation to the other modes of travel, the projected number of biking and walking trips is expected to increase when compared to the existing level of biking and walking by six percent in Year 2030 during the peak periods per the SANDAG Model:

- Transit trips are expected to increase from existing conditions to Year 2030 in the peak periods. Existing citywide peak period transit trips are 5.6 percent of all peak period trips and are expected to increase to 11.5 percent in Year 2030. This is an increase of approximately 66,300 (134 percent net increase as shown on **Table 3.15-10**) of new transit trips in the City by Year 2030 compared with Year 2005.
- Carpool trips are expected to increase from existing conditions to Year 2030 in the peak periods. Currently approximately 12.2 percent of trips during the peak hours are taken in

the carpool lane. This is expected to increase to 12.4 percent in Year 2030. This is an increase of approximately 18,200 trips using the carpool lanes.

- Biking and walking trips are expected to decrease as compared in relation to the other modes of travel in Year 2030. However, the projected number of biking and walking trips is expected to increase in Year 2030 when compared to the existing level of biking and walking in the peak periods. Existing citywide home-to-work peak period biking and walking trips are 3.4 percent and are expected to decrease to 3.1 percent in Year 2030, even though there is a net increase in number of biking and walking trips, approximately 1,750 which is a six percent net increase in Year 2030 as shown on **Table 3.15-10**.

***Table 3.15-10
Comparison of Citywide Home-to-work Peak Period Travel Mode
Year 2030 vs. Year 2005**

Measure	Year 2005 % Of Total Person Trips	Year 2030 % Of Total Person Trips	Year 2005 Person Trips	Year 2030 Person Trips	Net % Person Trips Increase From Year 2005 To Year 2030
Drive Alone Auto	78.8%	73.0%	690,548	736,697	7%
Carpool	12.2%	12.4%	106,587	124,785	17%
Transit	5.6%	11.5%	49,380	115,707	134%
Bike & Walk	3.4%	3.1%	30,085	31,883	6%
Total	100.0%	100.0%	876,600	1,009,072	15%

*6:00 a.m. to 9:00 a.m. and 3:00 p.m. to 6:00 p.m.

Focused Transit Investment Areas

Citywide comparisons of transit and automobile use provide only partial understanding of the role of each mode in a comprehensive mobility system. The street and freeway system extends to all developed areas within the City and is available for use 24 hours a day, seven days a week. In contrast, transit investments are typically focused in specific areas to increase the capacity and accessibility of the transportation system, and transit services are usually programmed to offer their highest levels of service during peak commute hours with service dropping off in times of lower demand. Citywide mode split comparisons dilute the significance of transit’s contributions to the mobility system by spreading out transit trips over times and areas that transit was not designed to serve.

In order to gain information on the role of transit in areas where significant transit investments have been made or are planned, data from the College Area, University, and Uptown communities was compiled as a part of the impact analysis. This data is derived from the same Transportation Model that was used to report on citywide impacts; a subset of the citywide data was collected by focusing in on smaller subareas.

College Area Community

A substantial investment in transit services have been made in the College Area through the extension of San Diego Trolley services and the ongoing operation of a bus/trolley transit center at San Diego State University (SDSU). While higher-quality transit services do not exist throughout

the entire community, the core, higher intensity areas are well-served. Note that Year 2005 conditions do not include the Trolley extension to SDSU. The MOBILITY 2030 plan identifies the El Cajon Boulevard Bus Rapid Transit project, which would connect SDSU to Downtown San Diego via College Ave/El Cajon Blvd/Park Blvd. Bus Rapid Transit services are also planned in the I-15 corridor, providing connections from the area to job centers to the north. This BRT service will be accessed via the El Cajon Blvd BRT service and local buses in the University Ave corridor.

Table 3.15-11 compares Year 2030 and Year 2005 peak period, home-to-work trips by travel mode in the College Area community. Key findings include:

- Transit trips are expected to increase from 6.2 percent to 17 percent of all peak period trips. This is an increase of approximately 203 percent (or 2,300 trips).
- Drive alone auto trips decrease from 77 percent to 68.5 percent of total peak hour trips.
- Bike and walk trips decrease from 4.6 percent to 3.5 percent of all peak period trips.

At 17 percent, the College Area has a higher projected transit mode split (home-to-work transit ridership during the peak hours) than the 11.5 percent citywide transit mode split shown on **Table 3.15-10**.

***Table 3.15-11**
Comparison of College Area Community
Home-to-work Peak Period Travel Mode
Year 2030 vs. Year 2005

Measure	Year 2005 % Of Total Person Trips	Year 2030 % Of Total Person Trips	Year 2005 Person Trips	Year 2030 Person Trips	Net % Person Trips Increase From Year 2005 To Year 2030
Drive Alone Auto	77.0%	68.5%	14,040	13,734	-2%
Carpool	12.2%	11.0%	2,225	2,203	-1%
Transit	6.2%	17.0%	1,126	3,409	203%
Bike & Walk	4.6%	3.5%	840	697	-17%
Total	100.0%	100.0%	18,231	20,043	10%

* 6:00 a.m. to 9:00 a.m. and 3:00 p.m. to 6:00 p.m.

University Community

The University community is currently served by local bus, express bus, and shuttle services. A transit center exists at the University Towne Center Shopping Center. Major Year 2030 transit service improvements planned for this area include:

- The Mid Coast trolley line extension from Old Town Transit Center to the University of California, San Diego (UCSD) and University City;
- The Nobel Coaster Station;
- Bus Rapid Transit services along the I-805 corridor connecting South Bay, Mid-City, and East County with the University City area; and

- The “Super Loop” shuttle, which is a higher-speed, limited-stop shuttle connecting residential and employment areas within the University City and UCSD communities.

Table 3.15-12 compares Year 2030 and Year 2005 peak period, home-to-work trips by travel mode in the University Community. Key findings include:

- Transit trips are expected to increase from 2.5 percent to 13.6 percent of all peak period trips. This is an increase of approximately 517 percent (or 12,400 trips).
- Drive alone auto trips decrease from 82.3 percent to 71.6 percent of all peak hour trips.
- Bike and walk trips decrease from 2.9 percent to 2.4 percent of all peak period trips.

At 13.6 percent, the University area has a higher projected transit mode split (home-to-work transit ridership during the peak hours) than the 11.5 percent citywide transit mode split shown on **Table 3.15-10**.

***Table 3.15-12**
Comparison of University Community
Home-to-work Peak Period Travel Mode
Year 2030 vs. Year 2005

Measure	Year 2005 % Of Total Person Trips	Year 2030 % Of Total Person Trips	Year 2005 Person Trips	Year 2030 Person Trips	Net % Person Trips Increase From Year 2005 To Year 2030
Drive Alone Auto	82.3%	71.6%	79,810	77,739	-2.6%
Carpool	12.3%	12.3%	11,963	13,324	11%
Transit	2.5%	13.6%	2,397	14,785	517%
Bike & Walk	2.9%	2.4%	2,805	2,678	-4.5%
Total	100.0%	100.0%	96,976	108,526	12%

* 6:00 a.m. to 9:00 a.m. and 3:00 p.m. to 6:00 p.m.

Uptown Community

The Uptown Community is currently served by some of the region’s most frequent local bus services. The MOBILITY 2030 plan shows introduction of Bus Rapid Transit service using along the 4th/5th Avenue corridor linking Uptown with Downtown and Mission Valley.

Table 3.15-13 compares Year 2030 and Year 2005 peak period, home-to-work trips by travel mode in the Uptown Community. Key findings include:

- Transit trips are expected to increase from 10.5 percent to 17.7 percent of all peak period trips. This is an increase of approximately 90 percent (or 3,700 trips).
- Drive alone auto trips decrease from 71 percent to 64.8 percent of all peak hour trips, a three percent decrease.
- Bike and walk trips decrease from 7.3 percent to 6.7 percent of all peak period trips, a four percent decrease.

At 17.7 percent, the Uptown area has a higher projected transit mode split (home-to-work transit ridership during the peak hours) than the 11.5 percent citywide transit mode split shown on **Table 3.15-10**.

***Table 3.15-13
Comparison of Uptown Community
Home-to-work Peak Period Travel Mode
Year 2030 vs. Year 2005**

Measure	Year 2005 % Of Total Person Trips	Year 2030 % Of Total Person Trips	Year 2005 Person Trips	Year 2030 Person Trips	Net % Person Trips Increase From Year 2005 To Year 2030
Drive Alone Auto	71.0%	64.8%	28,185	28,901	3%
Carpool	11.2%	10.7%	4,450	4,784	8%
Transit	10.5%	17.7%	4,164	7,890	90%
Bike & Walk	7.3%	6.7%	2,891	3,013	4%
Total	100.0%	100.0%	39,690	44,588	12%

* 6:00 a.m. to 9:00 a.m. and 3:00 p.m. to 6:00 p.m.

A major focus of the Draft General Plan is to create more walkable and transit-oriented communities. Policies in the Mobility Element address the need for multimodal system investments, an interconnected street and path system, for implementation of traffic calming and transit priority measures, for improved transit services, and for development of a Pedestrian Master Plan. Urban Design Element policies provide guidance on how to design pedestrian-transit-oriented development, and the Land Use Element calls for development of mixed-use, walkable village centers in areas served by the transit system.

The Draft General Plan has policies that call for the City to work with SANDAG to implement the City's General Plan policies and priorities for transportation improvements. Implementation of the Draft General Plan would support SANDAG's Smart Growth Concept Map, which would allow the City to compete for Smart Growth Incentive Funds that could be used for multimodal transportation improvements. The SANDAG Transportation Model forecasts that transit trips will increase, but shows a decrease in pedestrian and bicycle trips (see discussion on Model limitations provided above). The decrease in pedestrian and bicycle trips is a significant impact. However, there are many uncertainties associated with the multi-year implementation of the Draft General Plan and regional transportation plans that could result in the achievement of mode splits that differ from what has been projected. Uncertainties include potential changes in the availability of funding sources, project approval or construction delays, transportation infrastructure design changes due to environmental impacts, new studies or information that result in design changes, and new development projects that require new or different facilities.

In addition, a major update to the MOBILITY 2030 plan is underway which could result in the adoption of different strategies and projects that are unknown at this time. As a result, it is infeasible at this Program EIR level to provide specific mitigation that would reduce impacts to a less than significant level. As such, there is potential for significant unavoidable impacts related to multimodal transportation. For these reasons, at the Program EIR level, impacts to the multimodal trips are considered significant and unavoidable. Environmental analysis would be

required for any future projects (i.e., the RTP update, community plan updates, private development projects, and CIP projects); identification of project-specific mitigation measures would be determined at that time.

Could implementation of the proposed General Plan create an average demand for parking that could substantially exceed the available supply?

As infill development occurs there will likely be increase impacts to neighborhood traffic and parking. Parking management solutions will need to be more complex and tailored to meet varying situations. The Draft General Plan seeks to create conditions that will reduce the demand for parking, and the space devoted to the automobile, through factors including: mixed-use development; comfortable, attractive sidewalks; multiple and direct pedestrian street connections; high quality transit service; improved bicycle facilities; and use of parking management tools.

The parking needs of new development would be provided in accordance with the City's Land Development Regulations, including use of shared parking and Transit Area parking reductions (discussed in Section 13.15.1) where applicable. Solutions for parking problems that currently exist, or that would be exacerbated by the projected increased in population growth in the City and region, would be addressed using a mix of parking supply, management, and demand solutions. The Mobility Element, **Table ME-3**, Parking Strategies Toolbox, contains a menu of options that may be tailored for specific applications as needed.

While there are Draft General Plan policies and existing regulations that are designed to minimize parking impacts, there may still be localized parking impacts in the future. Therefore, at the Program EIR level, impacts to parking are considered significant and unavoidable. Environmental analysis would be required for any future projects (i.e., community plan updates, redevelopment plans, private development projects, and CIP projects); identification of project-specific mitigation measures would be determined at that time.

3.15.4 Mitigation Framework

Goals, policies, and recommendations enacted by the City combined with existing regulations described above provide a framework for developing project level protection measures for future discretionary projects which may increase traffic congestion, decrease multimodal trips, or create a demand for parking that substantially exceeds the available supply. The City's process for evaluation of discretionary projects includes environmental review and documentation pursuant to CEQA as well as an analysis of those projects for consistency with the goals, policies and recommendations of the General Plan and the applicable community plan. In general, implementation of the above policies and compliance with established regulations would minimize impacts. Compliance with regulations is required of all projects and is not considered to be mitigation. However, it is possible that for certain projects, adherence to regulations may not adequately address traffic and parking impacts and such projects would require additional measures to avoid or reduce significant impacts. These additional measures would be considered mitigation.

For each future discretionary project requiring mitigation (i.e., measures that go beyond what is required by existing regulations), project-specific measures will be identified that reduce significant project-level impacts to less than significant, or the project level impact may remain significant and unavoidable where no feasible mitigation exists. Where mitigation is determined to be necessary and feasible, these measures will be included in a Mitigation Monitoring and Reporting Program (MMRP) for the project. Future development is to be designed to avoid or mitigate significant impacts by using appropriate measures designed to achieve the factors listed below.

Walkable Communities – (see Draft General Plan policies ME-A.1 thru ME-A-~~9~~¹⁰ for the policy foundation):

- A safe and comfortable pedestrian environment.
- A complete, functional, and interconnected pedestrian network, that is accessible to pedestrians of all abilities.
- Greater walkability achieved through pedestrian friendly street, site and building design.
- Walking as a viable travel choice, particularly for trips of less than one-half mile.

Street and Freeway System – (see Draft General Plan policies ME-C.1 thru ME-C.10 for the policy foundation):

- A street and freeway system that balances the needs of multiple users of the public right-of-way.
- An interconnected street system that provides multiple linkages within and between communities.
- Safe and efficient street design that minimizes environmental and neighborhood impacts.
- Vehicle congestion relief.
- Well maintained streets.

Transportation Demand Management (TDM) – (see Draft General Plan policies ME-E.1 thru ME-E.8 for the policy foundation):

- Reduced single-occupant vehicular traffic on congested streets and freeways.
- Improved performance and efficiency of the street and freeway system, by means other than roadway widening or construction (although roadway widening or construction may still be required).
- Expanded travel options and improved personal mobility.
- Project related bicycling support infrastructure such as safe and secure bike storage, and showers and lockers for bicyclists.

Bicycling – (see Draft General Plan policies ME-F.1 thru ME-F.6 for the policy foundation):

- Bicycling as a viable travel choice, particularly for trips of less than five miles.
- Project-specific components of safe and comprehensive local and regional bikeway network.
- Environmental quality, public health and mobility benefits through increased bicycling.

Parking Management – (see Draft General Plan policies ME-G.1 thru ME-G.5 for the policy foundation):

- Parking that is reasonably available when and where it is needed through management of the supply.
- Solutions to project-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.
- Increased land use efficiencies in the provision of parking.

The Mitigation Framework may be updated, expanded and refined when applied to specific future projects based on project-specific design and changes in existing conditions, and local, state and federal laws.

3.15.5 Significance of Impact with Mitigation Framework

At this time, no specific projects have been proposed, and therefore it is not possible to propose feasible mitigation measures to reduce project-level impacts. It is infeasible in this Program level EIR to provide specific mitigation that would reduce impacts to a less than significant level. As such, significant unavoidable impacts related to transportation/traffic/circulation/parking remain.

[J5] Notes and References

City of San Diego.

- 1997 Municipal Code, Chapter 13, Article 2, Division 8: Parking Impact Overlay Zone Regulations.
- 2000 Municipal Code, Chapter 14, Article 2, Division 5: Parking Regulations.
- 2001 Municipal Code, Chapter 13, Article 2, Division 9: Residential Tandem Parking Overlay Zone.
- 2002 *Bicycle Master Plan*. May 2002.
- 2004 Council Policy 100-18. *Community Parking District Policy*. November 15, 2004.
- 2004 Manager's Report. *Analysis of Parking Task Force Recommendations*. No. 04-133. Land Use and Housing Committee. Agenda of June 16, 2004.
- 2005 Manager's Report. *Community Parking Districts*. No. 05-100. Land Use and Housing Committee. Agenda of April 20, 2005.

SANDAG.

- 2006 Revenue Constrained *Regional Transportation Plan: Update 2006*. February 2006.



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Figure 3.15-1
Existing and Proposed Bikeways

Bicycle Routes

- Existing Bicycle Facilities
- Proposed Bicycle Facilities

Bikeway classes have been generalized for mapping purposes based on City of San Diego Bicycle Master Plan.

Existing Bicycle Facilities include: Classes 1, 2, & 3 Bikeways

Proposed Bicycle Facilities include: Priority Classes 1, 2, & 3 as well as other proposed classes including 1, 2, & 3.

— Bicycle Facilities- Other Jurisdictions

Source: Other Jurisdiction Bicycle Facilities, SANDAG

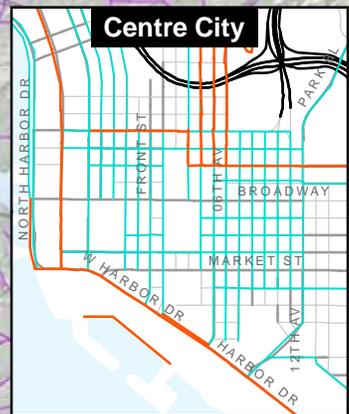
Existing and Planned Park and Open Space

- Park
- Open Space

Other Features

- Military Use

Dedicated and designated planned open space and park information represented here may not be the current land use, but a best estimate based upon the SANDAG and SanGIS generalized existing land use data and City of San Diego park and open space data.



0 1 2 4 6 Miles



**Existing and Planned
 Park and Open Space**

Dedicated and designated planned open space and park information represented here may not be the current land use, but a best estimate based upon the SANDAG and SanGIS generalized existing land use data and City of San Diego park and open space data.

Planned Transit Service

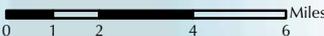
Planned higher frequency rail (Trolley and Coaster) and Bus Rapid Transit (BRT) routes represent the updated 2006 revenue constrained corridor and regional transit service from the adopted San Diego Association of Governments 2030 Regional Transportation Plan and the SR-56 transit route from the unconstrained network. The BRT routes and the Trolley Mid-Coast route represent new transit routes. The existing rail routes represent improved operating frequencies above the existing frequencies. Each route is planned to operate every 15 minutes or better during the morning and evening commute periods except for the Coaster, which is planned to operate every 20 minutes.

Existing Transit Service

Existing transit service represents the adopted Metropolitan Transit System 2006 Comprehensive Operational Analysis transit network. Higher frequency bus and trolley service represents the urban network of single routes traveling on key corridors every 15 minutes or better. Lower frequency service represents the remaining bus transit network.

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**Figure 3.15-2
 Transit
 Land Use
 Connections**

- Planned High Frequency Transit Service**
- Bus Rapid Transit & Rail
- Existing Transit Service**
- Higher Frequency Bus Service
- Lower Frequency Bus Service
- Existing and Planned Park and Open Space**
- Park, Open Space, and Recreation
- Planned Land Use**
- Multi-Family
- Commercial
- Multiple Use
- Single Family Residential and Other Uses
- Activity Centers**
- Government Centers
- Police Stations
- Hospitals
- Major Attractions
- Public Library
- Fire Stations
- Post Offices
- High Schools
- Military Facilities
- Universities & Colleges



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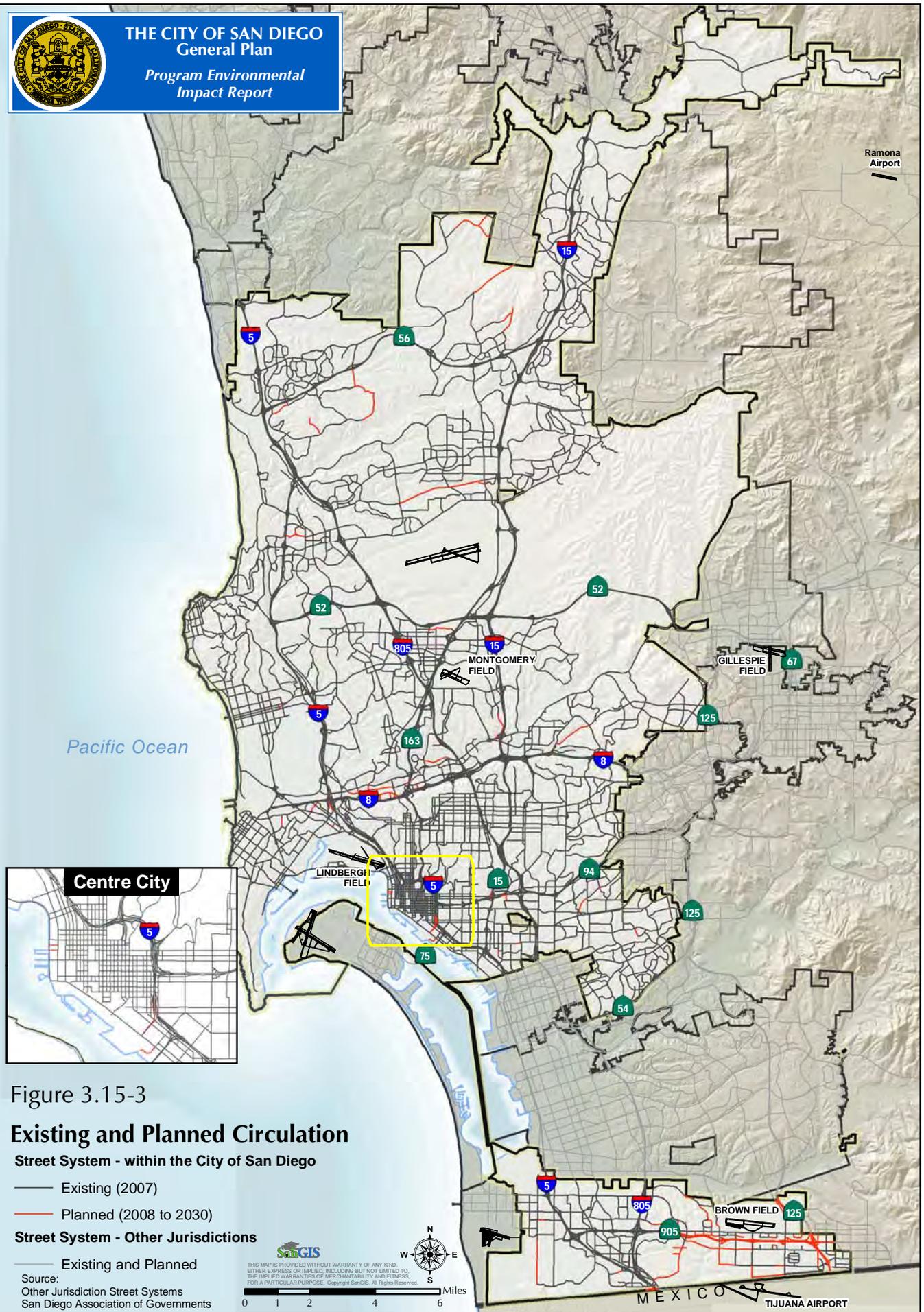


Figure 3.15-3

Existing and Planned Circulation

Street System - within the City of San Diego

- Existing (2007)
- Planned (2008 to 2030)

Street System - Other Jurisdictions

- Existing and Planned

Source:
 Other Jurisdiction Street Systems
 San Diego Association of Governments

SanGIS

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0 1 2 4 6 Miles



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Ramona Airport

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Figure 3.15-4
Existing Level
of Service
(Year 2005)

Level of Service		
Freeways	Arterials	
		LOS A, B, or C
		LOS D
		LOS E
		LOS F

Roadways
 — Freeway Lanes
 — Regional Arterials

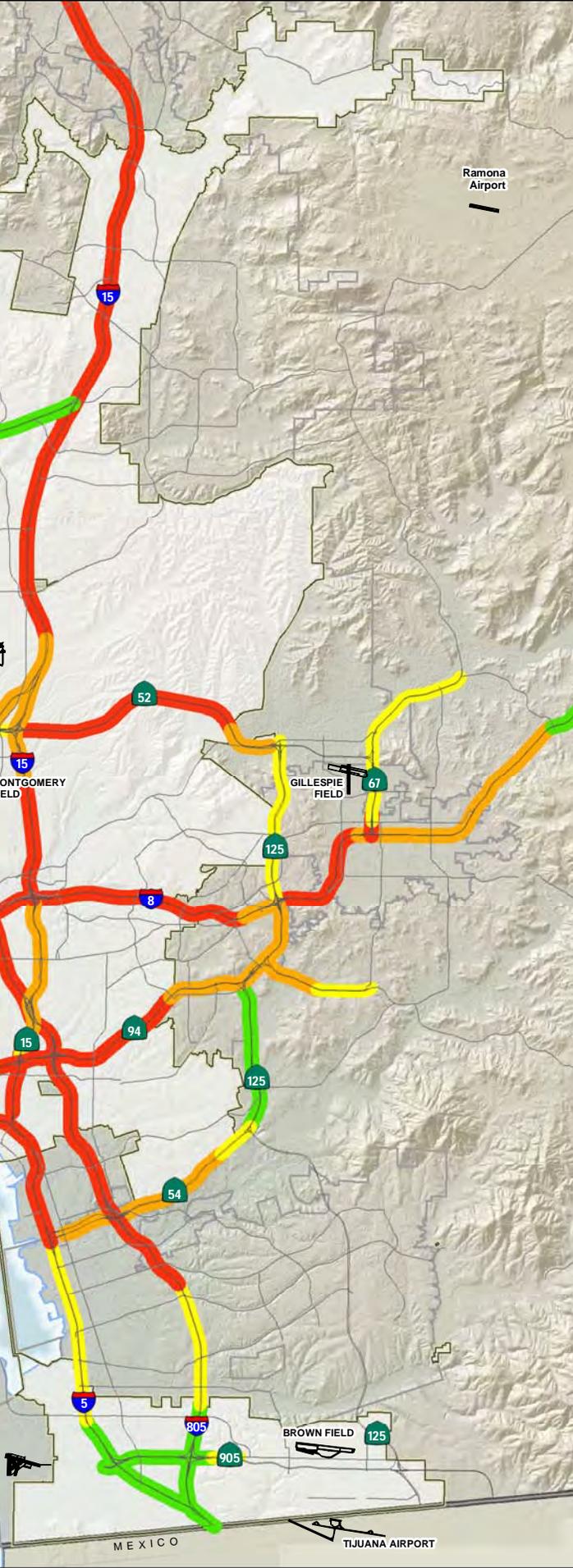


Source: San Diego Association of Governments, 2007

Notes: The information presented on this map was obtained from the San Diego Association of Governments (SANDAG). The SANDAG Level of Service (LOS) information shown is intended to be provide an overall assessment of freeways, but is not suitable for the evaluation of LOS on individual roadways in the City of San Diego.



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Figure 3.15-5

Year 2006 Transportation System

- Transit (Trolley and Coaster)
- Freeway Lanes
- Regional Arterials

Note: For the purpose of this map, the Mission Valley East Trolley Extension is shown, but it is not included in the 2005 base year existing conditions analysis.

Source: San Diego Association of Governments



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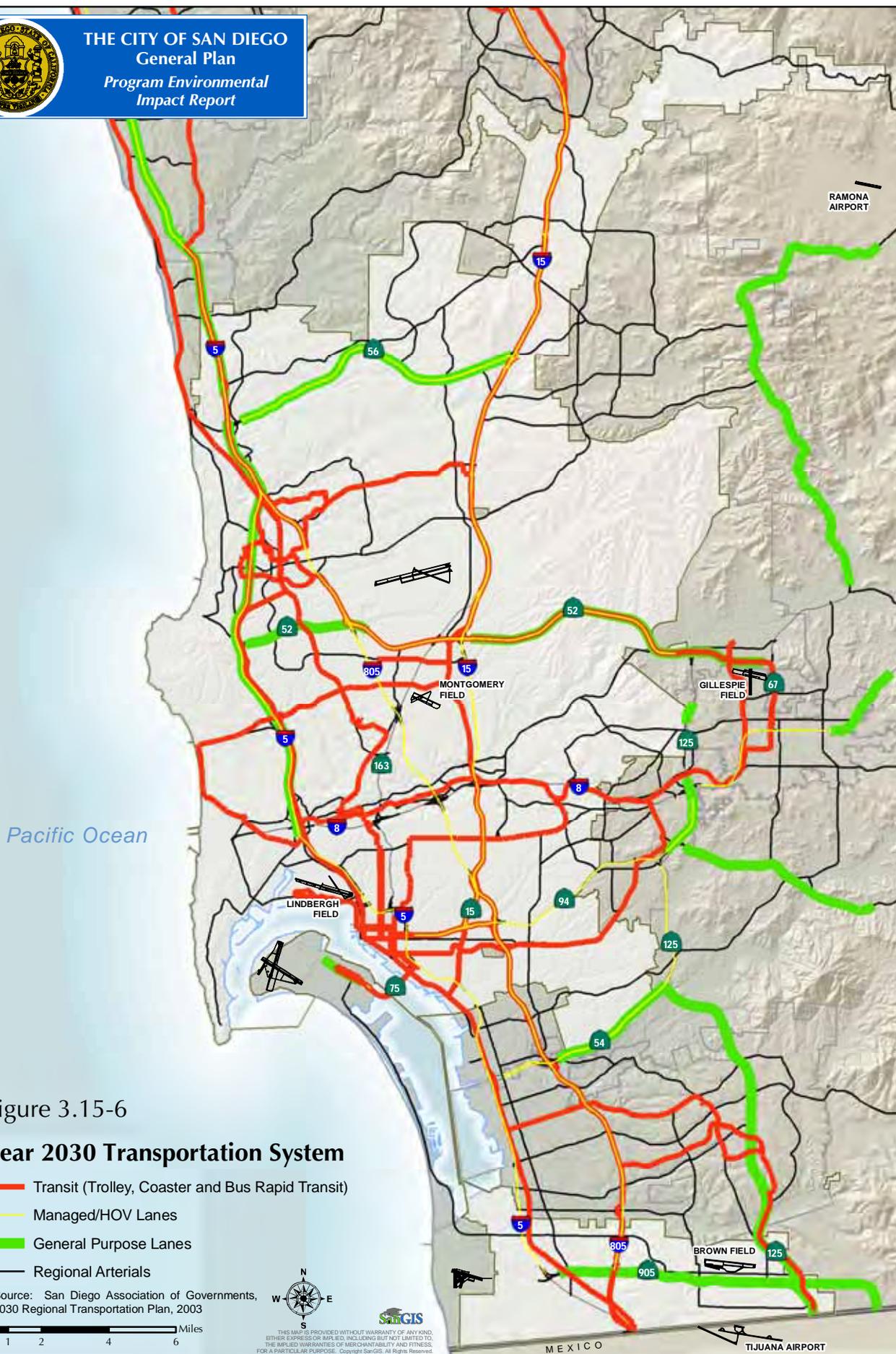


Figure 3.15-6

Year 2030 Transportation System

- Transit (Trolley, Coaster and Bus Rapid Transit)
- Managed/HOV Lanes
- General Purpose Lanes
- Regional Arterials

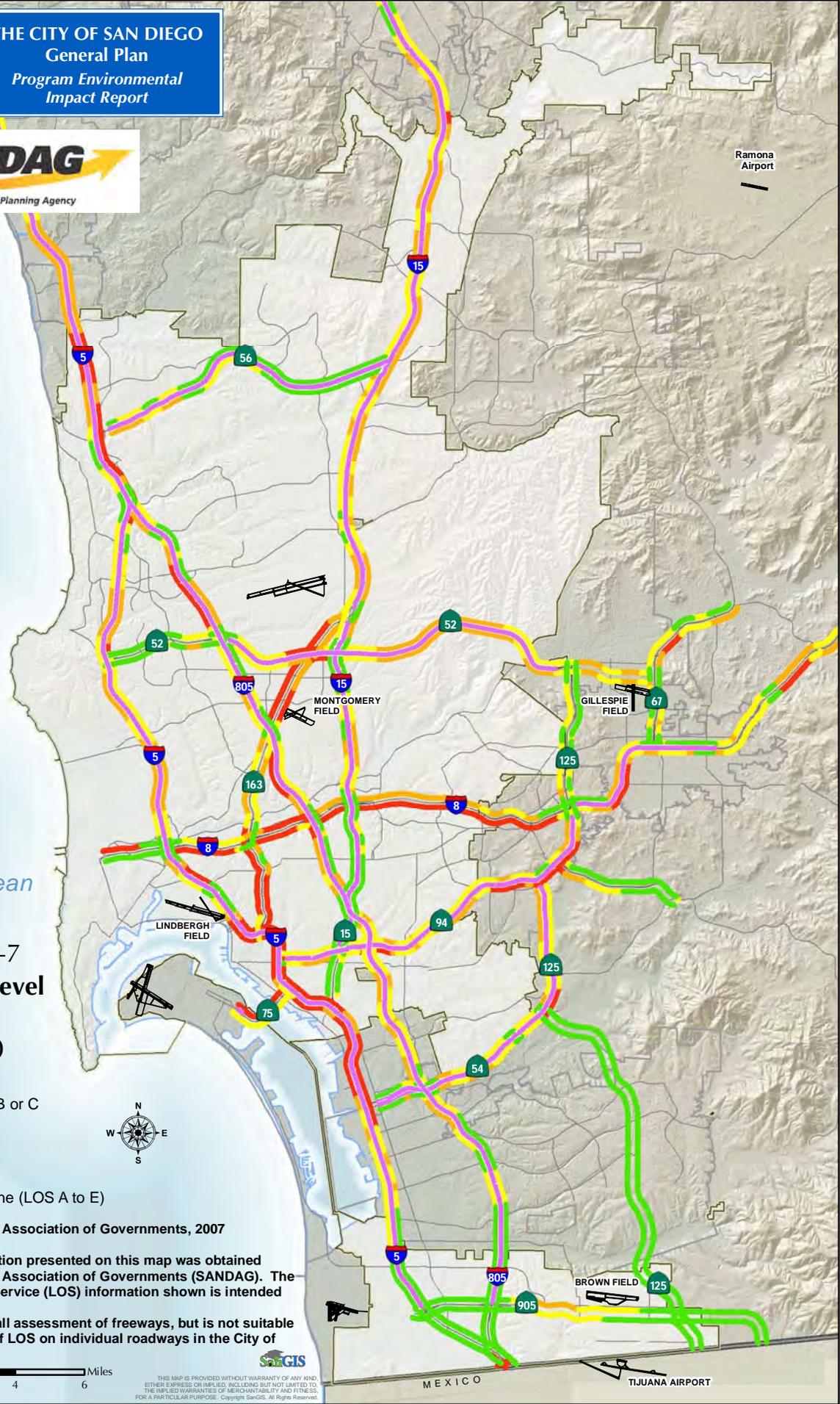
Source: San Diego Association of Governments,
 2030 Regional Transportation Plan, 2003



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Figure 3.15-7
Projected Level of Service
(Year 2030)

Level of Service

- LOS A, B or C
- LOS D
- LOS E
- LOS F
- HOV Lane (LOS A to E)

Source: San Diego Association of Governments, 2007

Notes: The information presented on this map was obtained from the San Diego Association of Governments (SANDAG). The SANDAG Level of Service (LOS) information shown is intended to provide an overall assessment of freeways, but is not suitable for the evaluation of LOS on individual roadways in the City of San Diego.



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3.16 VISUAL EFFECTS AND NEIGHBORHOOD CHARACTER

3.16.1 Existing Conditions

Regional Setting

San Diego is a city in a region with unique and varied landscapes – ocean, bays, and beaches, estuaries and river valleys, canyons and mesas, hills and mountains, and desert. Much of the City is situated in the coastal plain portion of southwestern San Diego County. This coastal plain slopes gently upwards to the eastern foothills and has been eroded into separate mesas. Numerous side canyons have incised the coastal plain and created major drainages which generally flow westward towards the coast. These major drainages are the San Dieguito River, Los Peñasquitos Canyon, Carroll Canyon, Rose Canyon, San Diego River, Los Chollas Creek, Sweetwater River, Otay River, and the westernmost mouth of the Tijuana River (City of San Diego Strategic Framework Element Final EIR, 2002).

Alongside these canyons and foothills are the many large mesas that serve as the foundation of various San Diego neighborhoods. These large mesas have developed into unique communities that are physically bounded by distinct natural barriers, namely the major east-west canyons. The City canyon system and steep hillsides are illustrated on **Figure 3.16-1**. While development has occurred in Mission Valley and portions of other drainages, efforts to provide open space and reduce land use intensity in San Dieguito River Valley, Los Peñasquitos Canyon, San Clemente Canyon, and the Otay River Valley allows the City of San Diego an opportunity to retain and/or develop unique communities with distinct physical separation (City of San Diego Strategic Framework Element Final EIR, 2002).

San Diego's location bordering the Pacific Ocean also contributes to the natural setting of the area. In fact, many of San Diego's most appreciated natural resources are located within the coastal zone. These include the City's beaches, bays, shoreline, coastal canyons and the many rivers, streams and other watercourses that drain inland areas, eventually reaching the coastal environment and waters. In the City of San Diego, the Coastal Zone encompasses approximately 40,000 acres of public and private land and waters. **Figure 3.8-3** (See Land Use section) illustrates the Coastal Zone boundary that was established by the Coastal Commission by way of the California Coastal Act.

Neighborhood and community borders are often defined by San Diego's interstate and highway system. Communities are connected through a system of transportation networks including major arterial freeways, highways, surface streets and public transportation routes. Available modes of public transportation include buses and regional light rail trains that link San Diego with other municipalities in the county. The City is also connected to the larger statewide and national transportation networks through established train lines and interstate freeways. Close proximity to Mexico and the presence of the federal ports of entry connect the City to the international arena as well. The area also enjoys a number of state designated scenic highways, which include portions of State Route 75 (SR-75), SR-78, SR-163, and SR-125.

Nearly 28 percent of all existing land use in San Diego consists of parks, open space and recreation areas. These areas are reserved for environmental protection and/or public recreation. Preserving parks and open space areas protects San Diego's unique natural landscape and scenic beauty. Natural scenic vistas can be seen from the 36,000 acres of recreational and open space parks in the City, such as Mission Trails Regional Park, Marian Bear Memorial Park, Rose Canyon Open Space Park and Tecolote Canyon Natural Park & Nature Center, San Diego River Park, Los Peñasquitos Canyon Preserve, Black Mountain Open Space Park, and San Pasqual/Clevenger Canyon Open Space Park.

In addition to scenic vistas and highways, public views are also identified in community plans. Although most community plans make some reference to public views, the detail varies from plan to plan with many plans making little or no reference to public views. See **Table 3.16-1**. In the community plans that do identify public views, the views are typically those which overlook or face a body of water, most often the Pacific Ocean, however, community plans also identify views overlooking canyons, the Centre City skyline, and open space. In 1972, voters approved Proposition D which restricts the building height in areas generally west of Interstate 5 (I-5) to 30 feet. Prior to the adoption of Proposition D, multiple dwelling unit developments in San Diego were built to accommodate a range of densities at varying heights. Since the adoption of Proposition D, the bulk and scale of buildings has become more uniform as property owners seek to maximize development potential within the 30-foot height limit.

The City of San Diego's Utilities Undergrounding Program is also improving views in neighborhoods. The City has been undergrounding lines since 1970, and the program is currently relocating approximately 30-35 miles of overhead utility lines underground throughout the City each year. It is estimated that nearly all major and collector streets residential areas will be completed within the next 20 ~~—25~~ years and streets in residential areas within approximately 50 years. The Utilities Undergrounding Program will help beautify neighborhoods and clear up views by hiding utility lines.

San Diego's communities, and the landscapes and transportation networks that frame and link them, are the City's basic building blocks. In the past, the pattern of development in San Diego has occurred on large vacant tracks of land. Currently, vacant land considered to be developable accounts for 3.6 percent or 6,756 acres of the City's total acreage. Vacant land is limited, and redevelopment and infill development is occurring in many parts of the City. The City is and will continue to experience infill development and redevelopment in urbanized communities, and a number of areas have qualified as redevelopment project areas in order to stimulate improvements within communities.

The California Community Redevelopment Law authorizes the City of San Diego to use special legal and financial mechanisms to eliminate blight and improve economic and physical conditions in designated areas of the City. San Diego's Redevelopment Agency was created in 1958 and currently manages redevelopment areas within the City's jurisdiction. Redevelopment activities in the Redevelopment Agency's 17 project areas are carried out by the City's Redevelopment Division and two public, nonprofit City corporations: Centre City Development Corporation and Southeastern Economic Development Corporation. These project areas, located

in various parts of the City, encompass more than 11,700 acres. **Figure 3.16-2** identifies the 17 project areas and provides the associated acreage for each project area.

Redevelopment is a tool used to improve deteriorated areas plagued by social, physical, environmental or economic conditions that act as a barrier to new investment by private enterprise. Infill development and redevelopment can stimulate visual improvements that contribute to revitalizing neighborhoods and restoring unique neighborhood qualities. The following is a summary of various redevelopment area objectives and should not be considered an exclusive and/or exhaustive list:

- Eliminate and prevent blight and deterioration.
- Create an attractive and pleasant environment.
- Preserve the historic character of commercial and residential districts.
- Improve the appearance and character of industrial and commercial uses.
- Explore opportunities for mixed uses.
- Revitalize deteriorated commercial corridors.
- Retain and expand neighborhood supporting businesses.
- Enhance economic growth.
- Expand and diversify employment opportunities and create living wage jobs.
- Develop affordable multifamily and senior housing.
- Provide affordable and market-rate housing opportunities and rehabilitation.
- Preserve existing housing stock.
- Improve the flow of traffic, enhance transportation and parking facilities.
- Improve public infrastructure and improve and/or develop public facility assets.
- Enhance and expand entertainment, cultural, and recreational opportunities.
- Resolve environmental issues.
- Address urban runoff and industrial pollution.
- Support habitat conservation and restoration.

The intent of redevelopment is primarily to eliminate blight from designated areas, as well as to achieve the goals of development, reconstruction and rehabilitation of residential, commercial, industrial, and retail districts. Each redevelopment area has individual objectives tailored to meet the needs of the community as described below.

Barrio Logan - The 133-acre Barrio Logan Redevelopment Project Area is located in a mixed-use community near Downtown San Diego at the foot of the San Diego/Coronado Bay Bridge. The project area is located along the San Diego harbor, close to the San Diego Convention Center, Centre City East Village and the ballpark redevelopment project. It is adjacent to Downtown, and is located near all forms of transportation and the San Diego Bay.

City Heights - The City of San Diego's 1,984-acre City Heights Redevelopment Project Area, comprised of various community planning areas, focuses on education and beautification of the community. The project area is bounded by Home and Euclid Avenues and 54th Street to the east, Meade and Monroe Avenues to the north, Home Avenue to the south, and Interstate 805 to the west. The centerpiece of the project area is the City Heights Urban Village, a public/private

partnership effort that encompasses nine City blocks. Other focus areas include the Interstate 15 corridor and the University Avenue and El Cajon Boulevard commercial corridors.

College Community - The City of San Diego's 131-acre College Community Redevelopment Project Area focuses on student housing needs, transportation planning, parking and public improvements. The project area is located immediately adjacent to the southern boundary of San Diego State University. It is primarily bounded by College Avenue to the east, the SDSU campus on the north, Montezuma Road to the south, and 55th Street to the west. The project area also includes the Montezuma Elementary School and a portion of the Alvarado Medical Plaza. The City is working with private developers to provide adequate student housing. Development has begun on several student housing projects, and a large mixed-use project is in the planning stage.

College Grove - The City of San Diego's 167-acre College Grove Redevelopment Project Area was adopted in 1986 to revitalize the aging College Grove Shopping Center by using tax increment revenue to finance street-related improvements around the shopping center for better traffic circulation. The project area, administered by the City's Redevelopment Division, comprises the 56-acre shopping center on College Avenue and State Route 94, and 111 acres of City land, including Chollas Lake Park and Chollas Landfill.

Crossroads - The City of San Diego's 1,031-acre Crossroads Redevelopment Project Area and Redevelopment Plan was established by the City Council on May 6, 2003. The focus of the Redevelopment Plan is twofold: to revitalize the properties along El Cajon Boulevard, University Avenue, Streamview Drive and College Avenue and the residential neighborhoods of Chollas Creek and Fox Canyon; and to develop the Resource-Based Parkland at Chollas Park.

Grantville - The City of San Diego's 990-acre Grantville Redevelopment Project Area was adopted in 2005. The Project Area is located in eastern San Diego and encompasses part of the Navajo Community, the Tierrasanta Community, and the College Area Community. The Project Area includes portions of the San Diego River, and it is located in close proximity to Mission Valley, Mission Trails Park and San Diego State University. The goals of the Grantville Redevelopment Project Area and Redevelopment Plan are to remove physical and economic blighting conditions and to ensure the continued economic viability of the commercial, industrial and retail uses within the Project Area.

Linda Vista - The City of San Diego's 12-acre Linda Vista Redevelopment Project Area was adopted in 1972 to facilitate the redevelopment of the Linda Vista Shopping Center, San Diego's oldest shopping complex. The Linda Vista Shopping Center includes the City Redevelopment Agency-owned Skateworld roller skating rink and the Linda Vista Library. The project area also contains Morley Strip, a small linear public park that runs parallel to Linda Vista Road. The project area is located in the heart of the Linda Vista community at the intersection of Linda Vista Road and Ulric Street. This redevelopment project area expires in 2012.

Naval Training Center - The City adopted a final Reuse Plan in October 1998, charting a new course for Naval Training Center (NTC). The former NTC is proposed to be a new urban village called Liberty Station. New homes, parks, businesses, as well as cultural and educational

facilities will transform the former Navy base into a vital waterfront community. The City NTC Reuse Plan calls for a pristine area surrounded by green landscaping and bordered by water, with a focus on NTC's history. This new community will anchor revitalization of the northern portion of San Diego Bay. It will also support education, training and research and development programs attracting new industries to San Diego.

North Bay - The City of San Diego's 1,360-acre North Bay Redevelopment Project Area is composed of a variety of land uses that are designated for residential, mixed-use, high technology office/flex/Research and Development (R&D), light industrial and retail development opportunities along I-5, Pacific Highway, Morena Boulevard, India Street, Loma Portal, Voltaire Street and in the City's Midway District. The project area is centrally located two miles from Downtown, is adjacent to the San Diego International Airport, is accessible by two major freeways, and has both light-rail and heavy-rail transportation for employees and freight.

North Park - The City of San Diego's 555-acre North Park Redevelopment Project Area is centrally located within 5 miles of Downtown San Diego and adjacent to Balboa Park. It is bounded by Interstate 805 to the east and Park Boulevard to the west and stretches as far north as Adams Avenue and as far south as Upas Street. Redevelopment in the project area focuses on the revitalization of North Park's commercial corridors, with special attention paid to the revitalization of the El Cajon Boulevard and University Avenue corridors. Historic preservation and public art are incorporated features within the redevelopment focus.

San Ysidro - The City of San Diego's 766-acre San Ysidro Redevelopment Project Area was established to create a world-class gateway between the cities of San Diego and Tijuana. The project area is located on the United States-Mexico border where Interstates 5 and 805 merge. It also includes a corridor along the San Diego Trolley route with retail and residential land. The project area focuses on redeveloping a vital business district, attracting new businesses to the area, and encouraging continued tourism from American and Mexican visitors.

Downtown - The Centre City Development Corp (CCDC) was established in 1975 to carry out redevelopment activities in Downtown San Diego. Its project areas comprise approximately 1,490 acres and include two redevelopment project areas: Horton Plaza and Centre City (Core/Columbia, Cortez, East Village, Gaslamp Quarter, Little Italy, Marina). The Horton Plaza Redevelopment Project was adopted in 1972 and Centre City Redevelopment Project was adopted in 1992. The two redevelopment areas provide a comprehensive communitywide approach to reverse blight and deterioration and encourage and establish a Downtown core for government, financial, commercial, and cultural activities integrated with distinct residential neighborhoods (Centre City Development Corporation 2004).

Southeastern area – The Southeastern Economic Development Corp (SEDC) was established in 1981 to carry out redevelopment in southeastern San Diego. SEDC project areas comprise of approximately 1,055 acres. The SEDC administers four redevelopment project areas and one study area.

- *Central Imperial* - The 580-acre Central Imperial Redevelopment Project Area was established in 1992. It is located east of Messina Drive across Interstate 805 and 69th Street

and includes portions of Chollas View, Emerald Hills, Lincoln Park, Mountain View, Valencia Park, Encanto and South Encanto neighborhoods.

- Gateway Center West - The 59-acre Gateway Center West Redevelopment Project Area was established in 1976. It is bound on the west by 32nd Street, by Highway 15 to the east, south by Market Street and north by Highway 94.
- Mount Hope - The 210-acre Mount Hope Redevelopment Project Area was established in 1982. It is located north and south of Market Street between Interstate 805 and Highway 15.
- Southcrest - The 301-acre Southcrest Redevelopment Project Area was established in 1986. It is bounded on the west by Highway 15 and I-5, to the east by 44th Street, south by Gamma and Vesta Streets and north of Logan Avenue.
- Dells Imperial Study Area - The Dells Imperial Study Area is approximately 980-acres immediately adjacent to Downtown San Diego and located within two historic districts: Sherman Heights and Grant Hills.

It is likely new redevelopment areas will occur over time. As newer neighborhoods age, there will be more redevelopment opportunities. Meeting the City's growth needs through infill and redevelopment compliments the City's strategy for protecting canyons and open spaces.

San Diego's built environment spans over 200 years of architectural history. The real urbanization of the City as it is today began in 1869 when Alonzo Horton moved the center of commerce and government from Old Town (Old San Diego) to New Town (Downtown). Development spread from Downtown based on a variety of factors, including the availability of potable water and transportation corridors. Factors such as views and access to public facilities affected land values, which in turn affected the character of neighborhoods that developed.

Many of San Diego's neighborhoods are the product of small incremental parcelizations and development over a long period of time. Neighborhood character is defined in part by certain physical qualities that repeat throughout neighborhoods, such as landscape and massing of buildings, colors, and materials. The character of a neighborhood or community is also defined by factors including topography and natural features, street layout and streetscape, and landmarks and civic land uses.

Urban design describes the physical features that define the character or image of a street, neighborhood, community, or the City as a whole. Urban design is 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. Citywide urban design recommendations are intended to ensure that the built environment continues to contribute to the qualities that distinguish the City of San Diego as a unique living environment.

Among the recognized architectural styles in San Diego are Spanish Colonial, Pre-Railroad New England, National Vernacular, Victorian Italianate, Stick, Queen Anne, Colonial Revival,

Neoclassical, Shingle, Folk Victorian, Mission, Craftsman, Monterey Revival, Italian Renaissance, Spanish Eclectic, Egyptian Revival, Tudor Revival, Modernistic and International. Examples of every major period and style remain, although few areas retain neighborhood-level architectural integrity due to several major building booms when older structures were demolished prior to preservation movements and stricter regulations regarding historic structures. (McAlester and McAlester 1990)

3.16.2 Thresholds of Significance

A significant impact could occur if implementation of the General Plan:

- Results in a substantial change in the topography or ground surface relief features of any areas of the City;
- Allows development that is incompatible in shape, form, or intensity such that public views from designated open space areas, scenic highways or to any significant visual landmarks or scenic vistas (e.g., mountains, bays, rivers, ocean) would be substantially blocked; or
- Results in projects that would negatively and substantially alter the existing character of the City's distinct neighborhoods.

3.16.3 Impact Analysis

Could implementation of the proposed General Plan result in a substantial change in the topography or ground surface relief features of any areas of the City?

The Draft General Plan calls for future growth to be focused into mixed-use activity centers. Implementation of the Plan would result in infill and redevelopment occurring in selected built areas, which would be identified through the community plan update/amendment process. The Draft General Plan would also guide the development of remaining developable vacant land. As new development occurs, changes to the landform may occur through site-specific grading. For example, new development may require significant on-site grading for development with larger footprints.

The City has policies and regulations which aim to preserve hillside areas throughout the City. Steep hillsides are shown on **Figure 3.16.1**. In general, steep hillsides are protected from excessive development by the City's Environmentally Sensitive Lands (ESL) regulations. Steep hillsides is defined in the Municipal Code Chap 11 Art 3 Div 1 §113.0103 as "all lands that have a slope with a natural gradient of 25 percent (four feet of horizontal distance for every one foot of vertical distance) or greater and a minimum elevation differential of 50 feet, or a natural gradient of 200 percent (one foot of horizontal distance for every two feet of vertical distance) or greater and a minimum elevation differential of ten feet." The ESL regulations are applied to both publicly- and privately-owned property.

The Draft General Plan provides policies which help reduce the potential for significant impacts

to topography and ground surface relief features. For example, the Urban Design Element addresses the natural environment, preserving open space systems and targeting new growth into compact villages through urban form and design policies.

There are several policies in the Draft General Plan which discuss environmentally sensitive development. The policies are intended to contribute to the qualities that distinguish San Diego as a unique living environment and highlight the value of open space resources as part of the overall built environment. Examples of Draft General Plan policies related to topography and ground surface relief features are as follows:

1. Avoid or minimize disturbances to natural landforms.
2. Contour manufactured slopes to blend with the natural topography.
3. Apply the appropriate zoning and regulations to limit development of floodplains, wetlands, steep hillsides, canyons, and coastal lands. Promptly replant exposed slopes and graded areas to avoid erosion.
4. Preserve and protect natural landforms and features.
5. Protect the integrity of community plan designated open spaces.
6. Continue to implement the Multiple Species Conservation Program (MSCP) to conserve San Diego's natural environment and create a linked open space system. Preserve and enhance remaining naturally occurring features such as wetlands, riparian zones, canyons, and ridge lines.

Aside from policies in the Draft General Plan which address topography and sensitive development, the City relies on Environmentally Sensitive Lands regulations to identify environmental resources at a site specific level. The City's Environmentally Sensitive Lands (ESL) regulations help protect, preserve, and restore lands containing steep hillsides, sensitive biological resources, coastal beaches, sensitive coastal bluffs, or Special Flood Hazard Areas. The intent of the ESL regulations is to assure that development occurs in a manner that protects the overall quality of the resources, encourages a sensitive form of development, retains biodiversity and interconnected habitats, maximizes physical and visual public access to and along the shoreline, and reduces hazards due to flooding in specific areas while minimizing the need for construction of flood control facilities. The regulations provide supplemental development regulations to the underlying zone to assure that development occurs in a manner that protects the natural and topographical character of these areas.

While the Draft General Plan policies are designed to minimize impacts to topography and ground surface relief features, there is no guarantee that all future implementation actions and development projects will adequately implement Draft General Plan policies. Assuming a site is underutilized based on planned land use and zoning, new development could potentially change the landscape of the built environment and result in grading and a change in ground surface relief features in order to maximize the development potential of a particular site.

Since no specific development project is proposed at this time, no project-level mitigation can be developed at this time to address potential environmental impacts. Environmental analysis would be required for any such future action or project; identification of project-level mitigation

measures would be determined at that time. Implementation of the above mentioned Draft General Plan policies and compliance with established development standards would serve to reduce impacts to a degree, but cannot guarantee that all future project level impacts will be avoided or mitigated to a level less than significant. Because the degree of impact and applicability, feasibility, and success of these measures can not be accurately predicted for each specific project at this time, the program level impacts related to changes in topography and ground surface relief features are considered significant and unavoidable.

Could implementation of the proposed General Plan allow development that is incompatible in shape, form, or intensity such that public views from designated open space areas, scenic highways or to any significant visual landmarks or scenic vistas (e.g., mountains, bays, rivers, ocean) would be substantially blocked?

With limited developable vacant land, the Draft General Plan anticipates future growth will likely occur along transportation corridors and within established urbanized areas. As new development occurs, a transition in building mass, form, and intensity is likely to occur in many areas of the City. For example, an existing commercial corridor which is currently characterized as having one- and two-story structures with surface parking may transition into a corridor with multistory structures and underground parking. The same commercial corridor which, in the past, may have been primarily commercial could redevelop with mixed uses, introducing new building types and forms. This new development and redevelopment may have the potential to block public views of scenic resources such as mountains, bays, rivers and the ocean. With growth expected to occur along transportation corridors, blocked views are most likely to occur as people travel on the public rights of way. However, views of important resources from designated open space areas, such as the City's parks and recreation areas could also be substantially changed. **Table 3.16-1** provides a list of identified public vantage points identified in community plans. Community plans that identify public views are typically those which overlook a body of water, canyons and open space, and/or the Centre City skyline.

The Draft General Plan provides policies which help reduce the potential for impacts to public views. The Draft General Plan addresses the natural environment, preserving open space systems and targeting new growth into compact villages through urban form and design policies. More specifically, the Urban Design Element contains policies which address development adjacent to natural features and reduce visual impacts to scenic areas or viewsheds. Relevant policies include:

1. Identify state highways where the City desires to preserve scenic qualities and work with California Department of Transportation (CALTRANS) to pursue official scenic highway designation.
2. Designate scenic routes along City streets to showcase scenic vistas and to link points of visitor interest.
3. Adopt measures to protect aesthetic qualities within scenic highways and routes.
4. Design development adjacent to natural features in a sensitive manner to highlight and complement the natural environment in areas designated for development.
5. Utilize a clustered development pattern, single-story structures or single-story roof elements, or roofs sloped toward the open space system or natural features, to ensure that

the visibility of new developments from natural features and open space areas are minimized.

6. Provide increased setbacks from canyon rims or open space areas to ensure that the visibility of new development is minimized.
7. 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.
8. 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 open space system could be used to determine compliance with this policy.
9. Protect views from public roadways and parklands to natural canyons, resource areas, and scenic vistas.
10. Protect and conserve the landforms and open spaces that: define the City's urban form; provide public views/vistas; serve as core biological areas and wildlife linkages; are wetlands habitats; provide buffers within and between communities, or provide outdoor recreational opportunities.
11. Convert ~~those~~ overhead utility wires and poles, and associated overhead structures for supplying electric, communication, community antenna television, or similar service to underground.

The Draft General Plan addresses preservation of the natural environment and scenic vantage points, as well as provides design objectives to minimize visual impacts and screen new development from open space areas. While the Draft General Plan policies are designed to minimize impacts to public views, there is no guarantee that all future implementation actions and development projects will adequately implement Draft General Plan policies. As a result, in areas where public views of scenic resources exist, direct impacts could occur. As future growth occurs in the City, any development that is incompatible in shape, form, or intensity such that public views are impacted, will be analyzed and addressed in project-specific environmental reviews pursuant to the California Environmental Quality Act (CEQA). Identification of appropriate project level mitigation measures would be determined at that time.

Implementation of the above mentioned Draft General Plan policies and future compliance with established development standards would serve to reduce impacts to a degree, but cannot guarantee that all future project level impacts will be avoided or mitigated to a level less than significant. Because the degree of impact and applicability, feasibility, and success of these measures can not be accurately predicted for each specific project at this time, the program level impacts related to blocked public views are considered significant and unavoidable.

Could implementation of the proposed General Plan result in projects that would negatively and substantially alter the existing character of the City's distinct neighborhoods?

The Draft General Plan incorporates the City of Villages strategy to focus future growth into mixed-use activity centers that are linked to the regional transit system. Since there is little

remaining developable vacant land, implementation of the Plan would largely occur through infill and redevelopment occurring in selected built areas, which would be identified through the community plan update/amendment process.

Over the last two centuries, San Diego has grown by expanding outward onto land still in its natural state. This is the first general plan in the City's continuing history that must address most future growth with limited expansion onto the City's remaining open spaces and vacant land. Because less than four percent of the City's land remains vacant and available for new development, the plan's policies represent a shift in focus from how to develop vacant land to how to reinvest in existing communities. Therefore, new policies have been created to support changes in development patterns to emphasize combining housing, shopping, employment uses, schools, and civic uses, at different scales, in village centers. By directing growth primarily toward village centers and transit corridors, the strategy is intended to preserve established residential neighborhoods and manage the City's continued growth over the long term.

A balance between preserving, improving and enhancing neighborhoods and the surrounding natural environment is an important core value that is reflected in policies throughout the Draft General Plan. Relevant policies include:

1. Identify sites suitable for mixed-use village development that will complement the existing community fabric or help achieve desired community character, with input from recognized community planning groups and the general public, -at-large.
2. Recognize that various villages may serve specific functions in the community and City; some villages may have an employment orientation, while others may be major shopping destinations, or primarily residential in nature.
3. Prepare community plans to address aspects of development that are specific to the community, including: distribution and arrangement of land uses (both public and private); the local street and transit network; location, prioritization, and the provision of public facilities; community and site-specific urban design guidelines; urban design guidelines addressing the public realm; community and site-specific recommendations to preserve and enhance natural and cultural resources; and coastal resource policies (when within the Coastal Zone).
4. Design roadways and road improvements to maintain and enhance neighborhood character.
5. Design buildings that contribute to a positive neighborhood character and relate to neighborhood and community context.
6. Encourage designs that are sensitive to the scale, form, rhythm, proportions, and materials proximate to commercial areas and residential neighborhoods that have a well established, distinctive character.
7. Provide architectural features that establish and define a building's appeal and enhance the neighborhood character.
8. Encourage innovative designs that distinguish civic and public buildings and landmarks from the surrounding neighborhood as a means of identifying their role as focal points for the community.

9. Review the redevelopment of property within conservation areas to maintain important bulk, scale, style, orientation, and other aspects of the surviving community character that have been identified as characteristics of a neighborhood that could be preserved.
10. ~~Pursue the use of identifying~~ Conservation areas that are identified at the community plan level, based on historical resources surveys, may be used as an urban design tool to maintain complement community character ~~and provide a buffer area between designated historical districts and areas expected to redevelop at higher densities.~~

As changes occur in established neighborhoods, the applicable policies in the Draft General Plan related to neighborhood character provide design guidelines to improve the transition between new and old structures. In addition, the Draft General Plan influences the implementation of community plans as it establishes goals and policies for the pattern and scale of development and the character of the built environment. Individual community plans are intended to provide additional recommendations for how new development will occur. It is intended that the urban design policies of the Draft General Plan be further supplemented with site-specific community plan recommendations. As community plans are updated, community and neighborhood character will be addressed more specifically.

While the policies, guidelines, and community plan updated process described above are designed to minimize future impacts to community character, future discretionary actions, private development projects, and public facilities (i.e. roads, transit lines, utilities) that occur subsequent to General Plan adoption may result in significant impacts associated with substantially altering the existing character of the City's neighborhoods. While the Draft General Plan policies are designed to minimize such impacts, there is no guarantee that all future implementation actions and development projects will adequately implement Draft General Plan policies.

Since no specific development projects accompany the Draft General Plan, no project-level mitigation can be developed at this time to address potential environmental impacts. Future environmental analysis pursuant to CEQA would be required for any such future discretionary action or project. The identification of appropriate project-level mitigation measures would be determined at that time. Because the degree of impact and applicability, feasibility, and success of these measures can not be accurately predicted for each specific project at this time, the program level impacts related to community character are considered significant and unavoidable.

3.16.4 Mitigation Framework

Goals, policies, and recommendations enacted by the City combined with existing regulations described above provide a framework for developing project-level protection measures for future discretionary projects which may impact topography, public views and/or neighborhood character. The City's process for evaluation of discretionary projects includes environmental review and documentation pursuant to CEQA as well as an analysis of those projects for consistency with the goals, policies and recommendations of the General Plan and the applicable Community Plan. In general, implementation of the above policies and compliance with established regulations would avoid or minimize significant environmental impacts. Compliance

with regulations is required of all projects and is not considered to be mitigation. However, it is possible that for certain projects, adherence to the regulations may not adequately protect topography, public views and neighborhood character, and such projects would require additional measures to avoid or reduce significant impacts. These additional measures would be considered mitigation.

For each future discretionary project requiring, mitigation (i.e. measures that go beyond what is required by existing regulations), site-specific measures will be identified that reduce significant project-level impacts to less than significant or the project-level impact may remain significant and unavoidable where no feasible mitigation exists.

No feasible specific mitigation has been identified at this program level to reduce visual impacts. Future discretionary actions and proposals will be analyzed pursuant to CEQA; project-level mitigation identified through this process would be applied at that time.

3.16.5 Significance of Impact after Mitigation Framework

The policies resulting from the adoption of the Draft General Plan could avoid or reduce the potential significant impacts to topography, public views and the existing character of established communities, but possibly not to below a level of significance. In addition, future community plan updates and the existing development review process could reduce potential impacts to visual and neighborhood quality. Because the degree of impact and applicability, feasibility, and success of future mitigation measures can not be adequately known for each specific future project at this program level of analysis, the program-level impacts related to topography, public views and character remains significant and unavoidable.

**Table 3.16-1
Community Plan Identified Public Vantage Points**

COMMUNITY	IDENTIFIED PUBLIC VANTAGE POINT	DESCRIPTION
Barrio Logan / Harbor 101	Harbor Drive Bridge over Switzer Creek	Views to the San Diego Bay
	Chollas Creek	Views to the San Diego Bay
	28th St and Harbor Dr	Views toward I-5, SR-15 freeway interchanges (major sculptural feature)
	Logan Ave	Centre City skyline and major industrial waterfront features
	National Ave	Centre City skyline and major industrial waterfront features
	Northern portion of community	Centre City skyline and major industrial waterfront features
Black Mountain Ranch	Northern portion of community	Views overlooking the canyon and open space
Carmel Mountain Ranch	I-15	Views into the southern portion of the community
	Communitywide	Views facing outside the community from open space areas in the south central portion of the community
Carmel Valley	Views not in current community plan	
Clairemont Mesa	Designated open spaces west of Clairemont Drive	Views facing west to Mission Bay and Pacific Ocean
	Communitywide	Many neighborhoods along the mesa overlook Mission Bay and the Pacific Ocean to the west, Fortuna Mountain and Cowles Mountain to the east and the open space canyon system
College Area	Views not in current community plan	
Del Mar Mesa	Views not in current community plan	
Elliott	Views not in current community plan	
Fairbanks Ranch Country Club	Views not in current community plan	
Golden Hill	Citywide	Structures should be designed to protect views of Golden Hill's natural scenic amenities, especially San Diego Bay, the Coronado Bay Bridge, Balboa Park, Switzer Canyon and the 32nd Street and 34th Street canyons
Greater North Park	Views not in current community plan	
Kearny Mesa	I-805, SR 52 & I-15	Create attractive views toward the community
La Jolla	Torrey Pines City Park	Viewshed overlooking coast
	La Jolla Farms Road	Scenic Overlook and Intermittent or Partial Vista looking west towards the coast
La Jolla	Scripps Natural Reserve	Viewshed overlooking coast

Table 3.16-1
Community Plan Identified Public Vantage Points

COMMUNITY	IDENTIFIED PUBLIC VANTAGE POINT	DESCRIPTION
	Bluff - top easement at La Jolla Shores Lane	View Cone overlooking coast
	Ellentown Road	Scenic Overlook looking west towards the coast
	La Jolla Shores Drive from Torrey Pines Road	Intermittent or Partial Vista looking west towards the coast
	La Jolla Shores Drive looking south from the vicinity of Scripps Institute of Oceanography	Viewshed overlooking coast, Scenic Overlook, Intermittent or Partial Vista, and a road from which coastal body of water can be seen
	Allen Field	Viewshed looking west towards the coast
	Bordeaux Ave (western half)	Scenic Overlook looking west towards the coast
	El Paseo Grande (after it turns east)	View corridor and a road from which coastal body of water can be seen.
	Camino del Oro (after it turns east)	Road from which coastal body of water can be seen
	Whale Watch Way	Intermittent or Partial Vista looking west towards the coast
	Cliffridge Park	Viewshed looking west towards the coast
	Kellogg Park	Viewshed overlooking coast and beach
	Calle Frescota	View corridor looking west towards the coast
	Prestwick Drive	Intermittent or Partial Vista looking west towards the coast
	Vallecitos	View corridor looking west towards the coast
	Avenida de la Playa	View corridor looking west towards the coast
	Calle del Cielo	Views looking west towards coast
	Pottery Canyon Park	Scenic Overlook looking west towards the coast
	Costabelle Drive	Scenic Overlook looking west towards the coast
	Spindrift Drive (south of the Marine Room Restaurant)	Viewshed looking west towards coast
	Charlotte Park (at the foot of Charlotte Street)	View Cone and View Corridor overlooking coast
	Coast Blvd, Children's Pool, Shell Beach, Ellen B. Scripps Park and La Jolla Cove	Viewshed along coast looking north, east and west
	Prospect St and Cave St	View Cone and View Corridor overlooking coast
	Coast Walk	View Cone overlooking coast
	Park Row (north end)	View Corridor looking north towards the coast
	Torrey Pines Road	Road from which coastal body of water can be seen looking north towards

**Table 3.16-1
Community Plan Identified Public Vantage Points**

COMMUNITY	IDENTIFIED PUBLIC VANTAGE POINT	DESCRIPTION
		the coast
	Public open space on Torrey Pines Rd between St. Louis Terrace and Calle de la Plata	Intermittent or Partial Vista looking north towards the coast
La Jolla	Azure Coast Drive	Views looking west towards coast
	Hidden Valley Road	Intermittent or Partial Vista looking west towards the coast
	Ardath Road	Road from which coastal body of water can be seen looking west towards the coast
	Girard Avenue	Scenic Overlook northwest towards the coast
	Jenner Street	View Corridor looking northwest towards the coast
	View corridor easement through 7963 Prospect Place to ocean	Scenic Overlook west towards the coast
	Easement across from John Coal Book Store from Prospect St and Recreation Center	Scenic Overlook west towards the coast
	Hillside Drive (portions)	Scenic Overlook west towards the coast
	Caminito Avola/Via Avola	View Cone looking north, east and west towards the coast
	Via Siena at Hillside Drive	View Cone looking north, east and west towards the coast
	Rue Denise	Scenic Overlook northwest towards the coast
	La Jolla Scenic Drive South (portions)	Scenic Overlook northwest towards the coast
	Mt. Soledad (north of Ardath Rd)	View Cone looking east towards canyons
	Rue Adriane	Scenic Overlook towards the coast
	Rue Michael	Scenic Overlook towards the coast
	Senn Way	Scenic Overlook towards the coast
	Rue de Roark	Scenic Overlook towards the coast
	Coast Blvd. Park and South Coast Blvd	Viewshed south and west along the coast
	View corridor at southwest side of Scripps Hotel site, from Prospect Street	View corridor west towards the coast
	La Jolla Community Center Park, Cuvier Street	View Cone looking west towards the coast
	From top of Cuvier Street at Prospect	View corridor northwest towards the coast
	Via Capri (portions)	Scenic Overlook towards the coast

**Table 3.16-1
Community Plan Identified Public Vantage Points**

COMMUNITY	IDENTIFIED PUBLIC VANTAGE POINT	DESCRIPTION
	Mount Soledad	Viewshed panoramic views north, south, west, and east
	Country Club Drive	Scenic Overlook towards the coast
	Marine St (Jones Beach)	View corridor west towards the coast
	Sea Lane	View corridor west towards the coast
La Jolla	Belvedere St	View corridor west towards the coast
	West Muirlands Dr	Scenic Overlook towards the coast
	Neptune Place and La Jolla Strand Park	Road from which coastal body of water can be seen looking west towards the coast
	Westbourne Street	View corridor west towards the coast
	Nautilus St	View corridor west towards the coast and road from which coastal body of water can be seen looking west towards the coast
	Muirlands Drive between Nautilus and La Jolla Mesa Drive	Intermittent or Partial Vista looking west towards the coast
	Soledad Mountain Rd	Intermittent or Partial Vista looking south towards downtown and the coast
	Windandsea Park	View Cone looking west along the coast
	El Camino del Teatro	Scenic Overlook towards the coast
	Portions of La Jolla Scenic Drive South	Road from which coastal body of water can be seen looking south and west towards the coast
	Bonair St	View corridor west towards the coast
	Plaza del Norte and Plya del Sur	Intermittent or Partial Vista west along the coast
	Gravilla St	View corridor west towards the coast
	Kolmar St	View corridor west towards the coast
	Rosemont St	View corridor west towards the coast
	Palomar St	View corridor west towards the coast
	Fay Avenue Bike Path	Views of open space, canyons
	Inspiration Dr	Scenic Overlook towards the coast
	Hermosa Terrace Park	Viewshed south and west along the coast
	Newkirk Dr	Scenic Overlook towards the coast

Table 3.16-1
Community Plan Identified Public Vantage Points

COMMUNITY	IDENTIFIED PUBLIC VANTAGE POINT	DESCRIPTION
	Rodeo Dr	Scenic Overlook towards the coast
	Via Espana	Scenic Overlook towards the coast
	Camino de la Costa (includes Cortez Place, Costa Place)	Viewshed south and west along the coast
	Desert View Dr	Intermittent or Partial Vista towards the coast
	La Jolla Rancho Rd	Scenic Overlook towards the coast
	Ravenswood Rd	Intermittent or Partial Vista towards the coast
La Jolla	La Jolla Hermosa Park	Viewshed north and west along the coast
	La Jolla Mesa Dr (from Cottontail Lane to Skylark St)	Road from which coastal body of water can be seen looking south and west towards the coast
	Moss Lane, off Dolphin Place	View Cone at the coast
	Bird Rock Ave	View corridor west towards the coast
	Dolphin Place	Intermittent or Partial Vista towards the coast
	Coral Lane	View corridor west towards the coast
	Chelsea Place	Intermittent or Partial Vista towards the coast
	Forward St	Viewshed looking south towards the coast
	Midway St	Viewshed looking south towards the coast
	Colima St (end of road closest to the ocean)	Scenic Overlook towards the coast
	Calumet Park	Viewshed south and west along the coast
	San Colla Street	Scenic Overlook towards the coast
	Ricardo Place	Scenic Overlook towards the coast
	Bandera St	View corridor west towards the coast
	Sea Ridge Dr	Intermittent or Partial Vista towards the coast
	Linda Way	View corridor south towards the coast
	Tourmaline Surfing Park	View corridor and view cone west towards the coast
	La Canada Canyon	Viewshed west towards the coast
	Princess St	View Cone north overlooking the coast
Linda Vista	Tecolote Canyon	Protect public views from the canyon

**Table 3.16-1
Community Plan Identified Public Vantage Points**

COMMUNITY	IDENTIFIED PUBLIC VANTAGE POINT	DESCRIPTION
Mid-City	Communitywide	Framed views of existing aesthetic resources such as parks and community landmarks
	Communitywide	Panoramic views of the bay, open spaces, and mountains from street rights-of-way and other public areas
Midway/Pacific Highway Corridor	Pacific Highway between Sassafras St. and Laurel St.	Preserve scenic vistas to the bay and other coastal areas... and utilize building design along view corridors to enhance views to the waterfront from public rights-of-way
Mira Mesa	Los Penasquitos Canyon Preserve	Provide view of canyon with scenic overlooks
Miramar Ranch North	Miramar Lake	Views from and of these areas across the lake
	Western escarpment of community	Maintain views to the ocean while providing a high quality visual experience to onlookers from the mesas below to the west
Mission Beach	Views not in current community plan	
Mission Valley	Communitywide	Views should be provided from public streets into the river corridor.
	Communitywide	Aerial views from the hillsides into the river area from public areas such as parks and roads in surrounding communities.
Navajo	Views not in current community plan	
Old Town	Views not in current community plan	
<u>Otay Mesa</u>	<u>Communitywide</u>	<u>Preserve privacy and views</u>
<u>Otay Mesa - Nestor</u>	<u>Views not in current community plan</u> <u>Palm Avenue</u> <u>Transit Center/Park-and-Ride</u>	<u>Provide a viewpoint overlooking the valley, north of the trolley station parking lot. Provide physical access, via a stairway, into the valley.</u>
	<u>Midway Baptist Church</u>	<u>Encourage the Church to provide a public viewpoint overlooking the valley.</u>
	<u>Palm Avenue</u>	<u>This site is the only area between I-5 and I-805 that provides direct views into the valley from Palm Avenue. Preserve visual access and provide a public viewpoint from Palm Avenue. Provide public trail and vehicular access along the existing unimproved road alignment from Palm Avenue into the valley.</u>
	<u>Montgomery High School</u>	<u>Provide pedestrian access through the school campus to the sites north of the ball fields and stadium. Improve this area of natural bluffs overlooking the valley as a passive recreation and viewing area.</u>
	<u>Cochran Avenue</u>	<u>This site is proposed as a mini park. Provide a public viewpoint</u>

Table 3.16-1
Community Plan Identified Public Vantage Points

COMMUNITY	IDENTIFIED PUBLIC VANTAGE POINT	DESCRIPTION
		<u>overlooking the valley, including landscaping and seating. Design of this area should prevent vehicular access north of Lindberg Street, and should discourage and prevent trash dumping over the cliff.</u>
	<u>Finney Elementary School</u>	<u>Provide pedestrian access through the school campus to the north of the ball field and playground. Improve this area of natural bluffs overlooking the valley and finger canyons as a passive viewing area.</u>
	<u>Murrieta Circle</u>	<u>An existing utility easement road provides access from Murrieta Circle down to the valley. Work with SDG&E to provide public access to this trailhead and viewpoint overlooking the valley.</u>
	<u>Servando Avenue</u>	<u>Provide viewpoints along the alignments of Valentino Street and Bluehaven Court by clearing non-sensitive vegetation along the south side of this street, adjacent to the Tijuana River Valley. The viewpoints will provide aesthetic enjoyment for local residents and assist the U.S. Border Patrol in their operations.</u>
Pacific Beach	Loring St.	View corridor facing west toward the ocean
	Law St.	View corridor facing west toward the ocean
	Chalcedony St.	View corridor facing west toward the ocean
	Missouri St.	View corridor facing west toward the ocean
	Diamond St.	View corridor facing west toward the ocean
	Emerald St.	View corridor facing west toward the ocean
	Felspar St.	View corridor facing west toward the ocean
	Mission Blvd	Intermittent public view of the ocean
Pacific Beach	Bayard St (south)	Intermittent public view of the ocean
	Pacific Beach Dr.	Intermittent public view of the Sail Bay
	Lamont St.	View facing south to Mission Bay
	Grand Ave (west and central portion community)	Intermittent public view of the ocean and bay
	I-5 (southern portion of the community)	View facing south to Mission Bay
	Riviera to Crown Point Dr.	Views of the bay
Pacific Highlands Ranch	Gonzales Canyon and east-west urban amenity	Open space overlook
	Near elementary school/park overlooking	Overlooking McGonigle Canyon

**Table 3.16-1
Community Plan Identified Public Vantage Points**

COMMUNITY	IDENTIFIED PUBLIC VANTAGE POINT	DESCRIPTION
	McGonigle Canyon	
	South terminus of eastern neighborhood parkway	Open space overlook
	Community-wide	Utilize public view opportunities on the edge of the MHPA
Peninsula	Catalina Blvd (southern portion)	Coastal vistas facing east and west
	Shelter Island Dr	Bay and downtown view facing north, west and south
	Rosecrans	Facing southeast
	Talbot	Facing east toward the San Diego Bay
	Canon	Facing southeast toward the San Diego Bay
	Garrison	Facing southeast toward the San Diego Bay
	Chatsworth	Facing northeast
	West Point Loma Blvd	Facing south/southeast
	Famosa Blvd	Facing south
	Santa Barbara	Facing northwest toward the coast
	Point Loma Ave	Facing northwest toward the coast
	Sunset Cliffs Blvd	Coastal vistas facing west
	Sunset Cliffs Shoreline Park	Unobstructed ocean view
	Former NTC site	Southeastern view corridors from Womble Street to Sims Rd
Rancho Bernardo	Views not in current community plan	
Rancho Penasquitos	Communitywide	Public access to canyon rims and views should be provided at suitable locations in the form of paths, scenic overlooks and streets
	Communitywide	Encourage retention of wildlife habitat value in connected open space systems by providing visual access where possible by overlooks
Sabre Springs	Four viewpoints and passive areas along Chicarita Creek and Penasquitos Creek	
San Pasqual Valley	Views not in current community plan	
San Ysidro	Views not in current community plan	
Scripps Miramar Ranch	Miramar Reservoir	Public viewpoints overlooking the reservoir
	Pomerado Road	Overlooking Carroll Canyon

**Table 3.16-1
Community Plan Identified Public Vantage Points**

COMMUNITY	IDENTIFIED PUBLIC VANTAGE POINT	DESCRIPTION
	SDG&E Easement (Area "E")	View toward open space
Serra Mesa	Views not in current community plan	
Skyline - Paradise Hills	Communitywide	Views of undeveloped hillsides, canyons, and mountains toward the east, should be protected
Sorrento Hills	Views not in current community plan	
Southeast	Communitywide	Care should be taken to maintain and enhance views to designated open space areas from public rights-of-way. These views should be considered in the review of discretionary permits.
Tierrasanta	Communitywide	Public views toward open space including Mission Trails Regional Park and Admiral Baker Field.
Tijuana River Valley	Views not in current community plan	
Torrey Highlands	Views not in current community plan	
Torrey Pines	Views not in current community plan	
University	Communitywide	Visual access to open space areas from public roadways
Uptown	Adams Ave at Campus Ave	Viewshed facing northwest
	10th Ave and Johnson Ave	Viewshed facing north/northeast
	Northern edge of 3rd Ave	Viewshed overlooking Mission Valley
	Northern edge of Stephens St. at West Arbor Dr	Viewshed facing north toward Mission Valley
	Pringle St at Neale St	Viewshed facing southwest
	Laurel St at 1st	Viewshed facing west
Via de la Valle	San Andres Dr and Via Campestre	View facing north overlooking golf course
	West of San Andres Dr and East of Highland Dr	View facing southeast
	South of San Andres Dr and North of Via de la Valle	Views facing south

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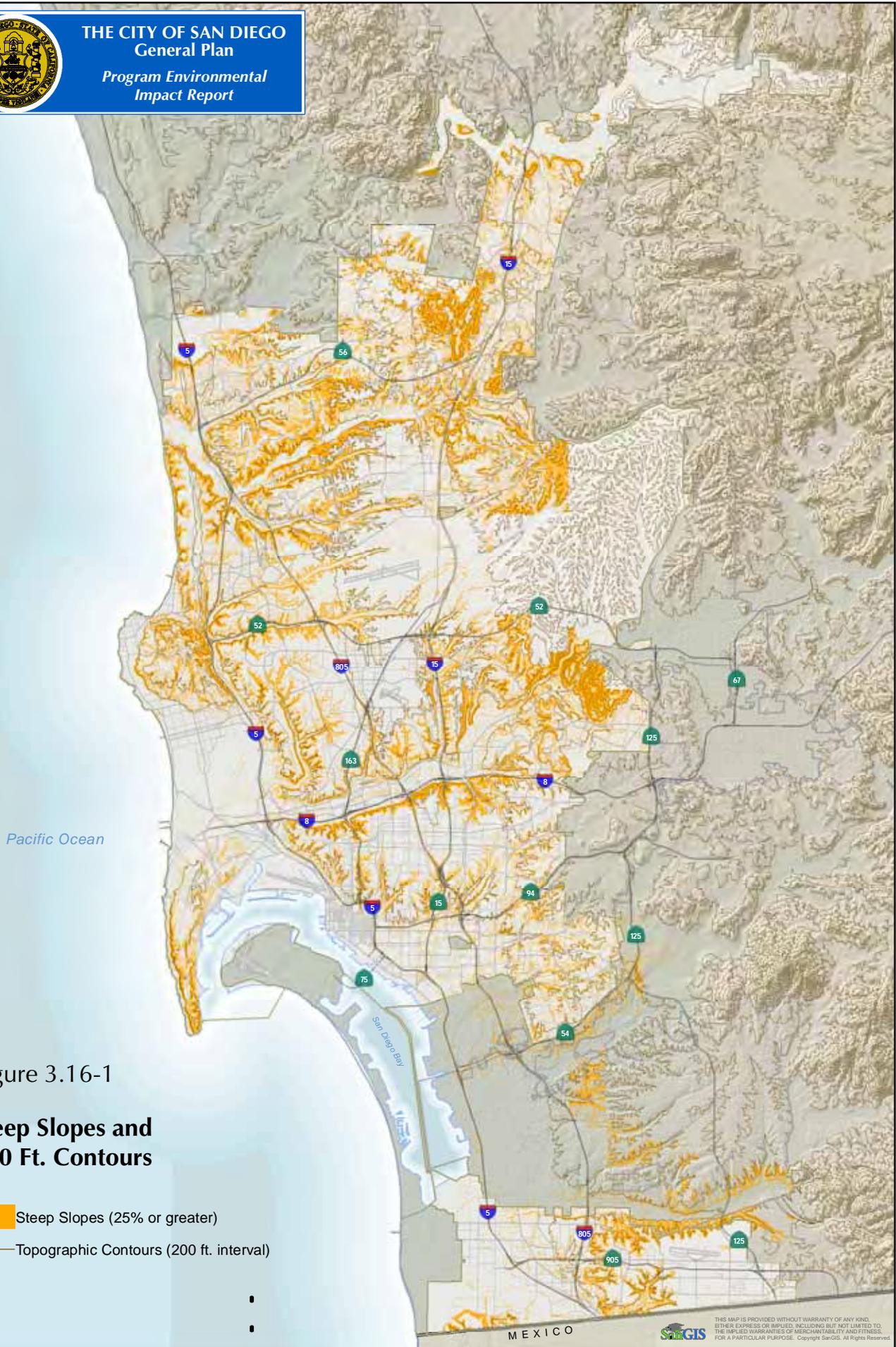


Figure 3.16-1

Steep Slopes and 200 Ft. Contours

-  Steep Slopes (25% or greater)
-  Topographic Contours (200 ft. interval)



THE CITY OF SAN DIEGO
 General Plan
 Program Environmental
 Impact Report

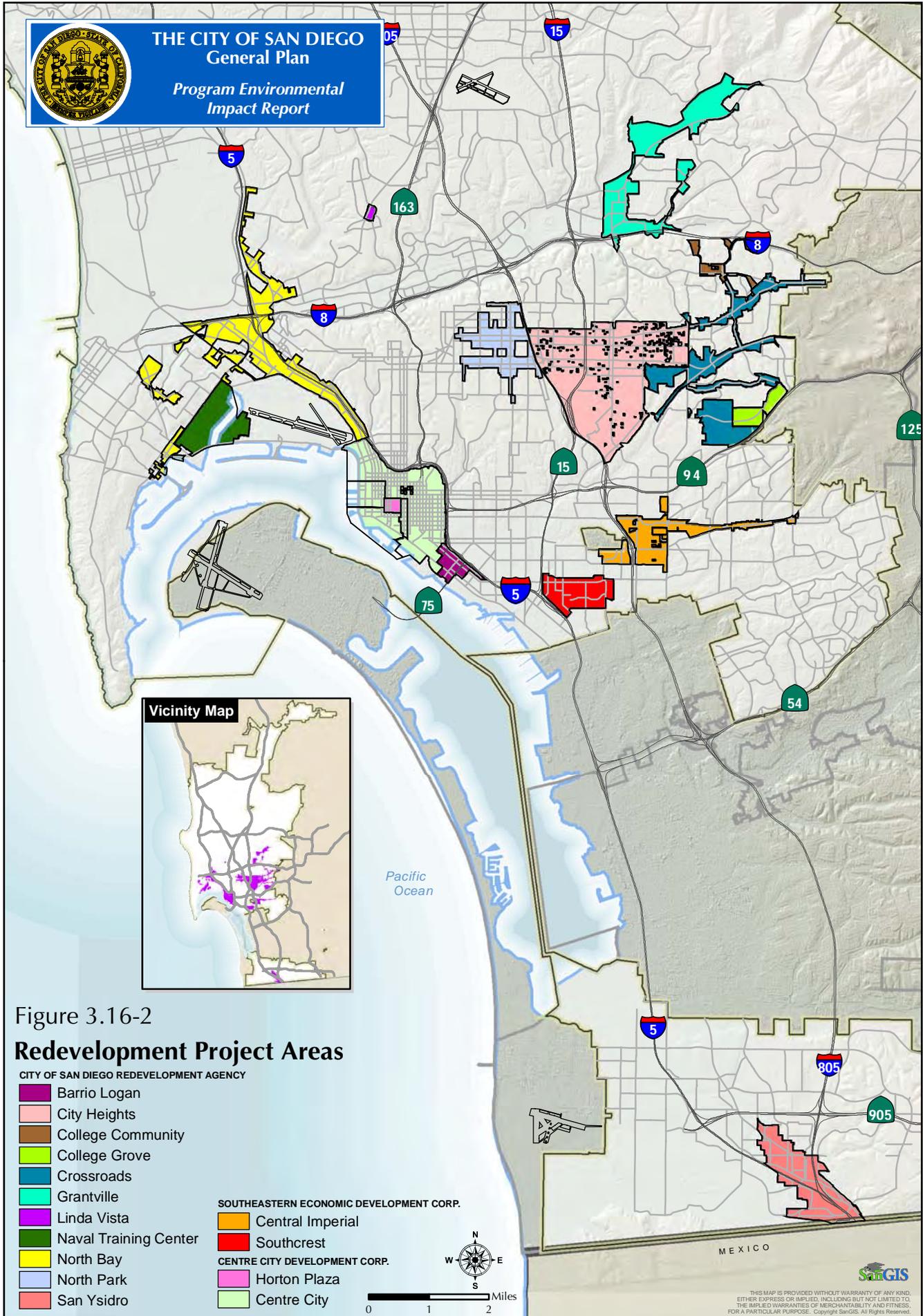


Figure 3.16-2

Redevelopment Project Areas

CITY OF SAN DIEGO REDEVELOPMENT AGENCY

- Barrio Logan
- City Heights
- College Community
- College Grove
- Crossroads
- Grantville
- Linda Vista
- Naval Training Center
- North Bay
- North Park
- San Ysidro

SOUTHEASTERN ECONOMIC DEVELOPMENT CORP.

- Central Imperial
- Southcrest

CENTRE CITY DEVELOPMENT CORP.

- Horton Plaza
- Centre City



0 1 2 Miles

MEXICO



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3.17 WATER QUALITY

3.17.1 Existing Conditions

Surface/Receiving Waters

The major receiving waters within the City of San Diego include the Pacific Ocean, San Diego Bay, Mission Bay, the San Dieguito River, Los Peñasquitos Creek, the San Diego River, the Otay River and the Tijuana River (**Figure 3.7-2**). Major reservoirs include Barrett, El Capitan, San Vicente, Hodges, Miramar, Murray, Lower Otay, Upper Otay, and Sutherland. Additionally there are minor receiving waters made up of creeks, channels, streams and lagoons.

Groundwater

The geography of San Diego provides limited natural local supplies in the form of groundwater, and it is not currently considered a useable potable water resource. With the close proximity to the ocean and the shallow location of the water table, groundwater and ocean water mix subsurface and become brackish. In order to become usable, much of the available groundwater would need to undergo desalination. The Water Department has studied numerous potential groundwater supply options and has an ongoing Capital Improvement Project to continue to develop potential groundwater resources including groundwater desalination, but there is not any active use of potable groundwater at this time. Potential groundwater supplies are estimated at 6,000 – 20,000 AFY, but the current cost of utilizing the supply with existing technology is infeasible.

City of San Diego's Water Quality

Many of the City's water bodies harbor sensitive biotic communities easily affected by added pollutant discharges; the quality of sensitive bodies of surface water varies. Certain reservoirs, particularly the Hodges Reservoir, have experienced high Total Dissolved Solids (TDS) levels due to the introduction of Colorado River water and high evaporation rates. Typical pollutants include dissolved solids, nutrients such as nitrate and phosphate, organic materials, bacteria, heavy metals, pesticides, and toxic industrial wastes. Sedimentation from unprotected construction sites is a water quality problem that is altering certain sensitive lagoons. Accumulation of trash within receiving waters is also contributing to the impairment of the City's water resources. The City's water bodies are also susceptible to eutrophication, which is characterized by an abundant accumulation of nutrients that support a dense growth of algae and other organisms, the decay of which depletes shallow waters of oxygen in summer.

Section 303(d) of the Clean Water Act requires states to periodically prepare a list of all surface waters in the state for which beneficial uses of the water – such as for drinking, recreation, aquatic habitat, and industrial use – are impaired by pollutants. These are water quality limited estuaries, lakes, streams and coastal regions that fall short of state water quality standards, and are not expected to show improvement in the next two years. Portions of water bodies within the City of San Diego which were listed as impaired in 2002 are listed on **Table 3.17-1**.

**Table 3.17-1
Impaired Water Bodies with the City of San Diego**

Water Body	% of Total
Chollas Creek	Bacterial Indicators, Cadmium, Copper, Lead, Diazinon, Zinc
Famosa Slough and Channel	Eutrophic
Hodges Reservoir	Color, Nitrogen, Phosphorus, TDS
Los Peñasquitos Lagoon	Sedimentation
Mission Bay	Eutrophic, Bacterial Indicators, Lead
Pacific Ocean Shoreline	Bacterial Indicators
San Diego Bay	Bacterial Indicators, Chlorade, Copper, Degraded Benthic Comm., Lindade, Mercury, PAHs, PCBs, Sediment Toxicity, Zinc
San Diego River	Fecal Coliform, Dissolved Oxygen, Phosphorus, TDS
Tecolote Creek	Bacterial Indicators, Cadmium, Copper, Lead, Toxicity, Zinc
Tijuana River	Bacterial Indicators, Low Dissolved Oxygen, Eutrophic, Pesticides, Solids, Synthetics Organics, Trace Elements, Trash
Tijuana River Estuary	Bacterial Indicators, Eutrophic, Lead, Nickel, Pesticides, Thallium, Trash, Dissolved Oxygen

Source: RWQCB, 2002

Water Pollutant Sources

Sources of pollutants can be classified as two types: point and nonpoint sources. Point sources of water pollutants are defined as sources from which wastewater is transmitted in some type of conveyance (pipe and channel) to a water body, and are classified as municipal or industrial sources. Municipal point sources consist primarily of domestic treated sewage and processed water. Industrial point sources are primarily from such operations as sand and gravel extraction; livestock and dairy operations; trailer park, park, and camp development; electrical power generation; metal plating and printed circuitry etching; operations associated with shipbuilding and repair; and wastes from federal, commercial, and recreational vessels.

Nonpoint sources are those sources of water pollutants which do not discharge to a watercourse from a pipe. This pollution arises from many everyday activities that take place in residential, commercial, and rural areas and is carried by storm water runoff to streams. Nonpoint sources, however, have been suspected of causing significant water quality problems. In urban areas, the storm water runoff from streets likely carries considerable quantities of harmful materials, such as oil, rubber, metals (including lead), pathogens, trash, and other solids. In addition, increased peak flows from roadway runoff can also alter the hydraulics of an area by scouring and transporting and depositing sediments in areas lower than the runoff source.

Regulatory Setting

Water resources are protected under the mandates of numerous federal, state and local jurisdictional laws, regulations, plans and ordinances and these must be considered in the early planning stages of any project. Future projects implemented under the General Plan will be required to adhere to the requirements of these regulations.

Federal

Clean Water Act. This act is the principle law governing pollution control and water quality of the nation's waterways. The objective of this act is to restore and maintain the chemical, physical and biological integrity of the nation's waters (33 U.S.C. 1251). Section 402 of the Clean Water Act controls water pollution through the National Pollutant Discharge Elimination System (NPDES), by regulating point sources that discharge pollutants into waters of the U.S. Implementation of the act is the responsibility of the Environmental Protection Agency (EPA), which has delegated much of that authority to state and regional agencies.

State of California

The Dickey Act. Enacted by the State of California in 1949, this Act created the nine Regional Water Pollution Control Boards (now referred to as the Regional Water Quality Control Boards) and sought to establish statewide water quality objectives. Initially these boards only established narrative objectives for discharges, but in 1952 they were further charged with establishing numerical limits for discharges and adopting water quality objectives for receiving waters.

Porter-Cologne Water Quality Act of 1969. This Act gave the power to the Regional Water Quality Control Boards (RWQCB) to establish water quality plans for each region. In 1975, a Comprehensive Water Quality Control Plan Report for each region was established (commonly referred to as the Basin Plan). These plans compiled all of the existing beneficial uses, water quality objectives, and policies into one document and rescinded all individually adopted objectives and policies. Also included were the control of point source discharges and the development of new programs to address nonpoint source pollution issues in the regions.

Since 1975, the individual Basin Plans have been amended on numerous occasions. Components of the Basin Plan are reviewed as new data and information become available or as specific needs arise. Many new issues and areas of concern have risen as health scientists have identified increasingly lower concentrations of toxic substances as health risks. Because of this, water quality objectives have to be constantly reexamined to maintain levels that are safe for the public. In addition all plans that can affect water quality are incorporated into the planning process. A comprehensive update of each Basin Plan occurs tri-annually in response to state and federal legislative requirements, and as funding becomes available.

State Water Resources Control Board (SWRCB) Construction General Permit, 99-08-DWQ. Construction activities that disturb one or more acres of land that could impact hydrologic resources must comply with the requirements of this permit. To be in compliance, the applicant for a construction permit must file a complete and accurate Notice of Intent with the SWRCB.

Compliance requires conformance with applicable Best Management Practices (BMPs) and development of a Storm Water Pollution Prevention Plan (SWPPP). The SWPPP must contain a site map(s) which shows the construction site perimeter, existing and proposed buildings, lots, roadways, storm water collection and discharge points, general topography both before and after construction, and drainage patterns across the project.

Local

San Diego Regional Water Quality Control Board (RWQCB or Water Quality Board) Order No. R9-2007-0001. In January of 2007, under the authority of the Clean Water Act amendments and federal NPDES Permit regulations, the Water Quality Board re-issued the order to the 18 cities within San Diego County, the county of San Diego, the Port of San Diego, and the San Diego Regional Airport Authority (Copermittees). Commonly referred to as the “Municipal Permit,” this order requires that all Copermittees within the San Diego region prepare Jurisdictional Urban Runoff Management Plans (JURMPs). Each JURMP must contain a component addressing land use planning for new development and redevelopment, construction, existing development, education, illicit discharge detection and elimination, public participation, effectiveness assessment and fiscal analysis. In addition, the Municipal Permit requires that Copermittees collaborate on the development of a Watershed Urban Runoff Management Plan (WURMP) for each watershed, which addresses high priority storm water quality issues found within the various watersheds.

City of San Diego Jurisdictional Urban Runoff Management Program (JURMP). This document is a total account of how the City of San Diego plans to protect and improve the water quality of rivers, bays and the ocean in the region in compliance with the RWQCB Order No. R9-2007-01. The document describes how the City incorporates storm water BMPs into land use planning, development review and permitting, City capital improvement program project planning and design, and the execution of construction contracts.

Watershed Urban Runoff Management Programs (WURMPs) The City of San Diego participated in the drafting of five WURMPs that document high priority storm water quality issues found within the following watersheds: San Dieguito, Los Peñasquitos, San Diego River, San Diego Bay (comprised of Pueblo, Sweetwater and Otay) and Tijuana. The City was the lead agency on the San Dieguito, Los Peñasquitos, and San Diego River documents. These WURMPs identify and prioritize water quality-related issues within each watershed that can be potentially attributed to discharges from the municipal storm drain systems. The reports describe the watershed in detail, characterize the water quality impairments (provide a baseline of data for future analysis), and set up an action plan explaining how the municipalities will collaborate to improve water quality.

City of San Diego Storm Water Standards Manual. This manual requires that urban runoff pollution issues be specifically addressed in development planning for public and private projects. In addition to considering alternative site design approaches and instituting source controls (i.e. methods to keep pollutants out of contact with storm water), structural treatment devices or storm water BMPs are required.

3.17.2 Thresholds of Significance

A significant impact could occur if implementation of the General Plan:

- Results in a substantial increase in pollutant discharge to receiving waters and increase discharge of identified pollutants to an already impaired water body;
- Impacts local and regional water quality or supply, including groundwater.

3.17.3 Impact Analysis

Could implementation of the Draft General Plan result in a substantial increase in pollutant discharge to receiving waters and increase discharge of identified pollutants to an already impaired water body?

The Draft General Plan calls for most future growth to be focused into mixed-use activity centers. Implementation of the Plan would result in infill and redevelopment occurring in selected built areas, which would be identified through the community plan update/amendment process. The Draft General Plan would also guide the development of remaining developable vacant land. Almost all the pollutants found in the impaired water bodies with the City have anthropogenic (man-made) origins; therefore increasing the population could increase the amount of pollution entering the aquatic ecosystem. Redevelopment and infill activities in urbanized areas could result in an increased amount of impervious surfaces. In addition, most development of vacant land could also decrease permeability.

These impervious surfaces would result in increased runoff, adding to local non-point source pollution. Chemical pollutants contained in runoff would be primarily attributable to motor vehicles, which contribute particulate materials from fuel combustion, petroleum products, metals, rubber, and asbestos to roadway pollutants. In addition, a potential would exist for biologically active chemicals such as herbicides and fertilizers and fecal matter from pets and wildlife to contribute pollutants. These pollutants accumulate on paved surfaces and adjacent areas; rain flushes the pollutants into storm drains and into natural drainages, and they are eventually deposited into the aquatic environment (i.e., lagoons, rivers, and lakes). Therefore, additional anthropologic sources and impervious surfaces created by future development as anticipated in the Draft General Plan could create additional sources of polluted runoff and constitute a significant impact.

Although no physical changes or development is proposed with the Draft General Plan, as the plan would be implemented in association with community plans and regulations, development could also cause erosion due to exposed graded surfaces, excavation, stock piling, or boring, and would potentially contribute to the sediment load in surface waters. Deposition of sediments downstream may be significant if they are introduced into a potable water supply (reservoirs), flood control channels, or wetlands. Increased deposition of sediments into water bodies can result in increased turbidity, clog streambeds, degrade aquatic habitat, and interfere with flow.

The General Plan Village Propensity Map identifies areas that already exhibit village characteristics, and areas that may have a propensity to develop as villages due to existing or community plan designated multifamily housing, parks, schools, fire stations, and higher frequency transit routes. Although actual village locations will be determined by forthcoming community plan updates and have not been determined at this time, the Propensity Map identifies areas where village designations are more likely to occur. Certain impaired water bodies are in close proximity to areas identified in the Village Propensity map as high propensity. These water bodies include Los Peñasquitos Lagoon, Pacific Ocean Shoreline, Mission Bay, Tecolote Creek, San Diego River, San Diego Bay Shoreline, Chollas Creek, and the Tijuana River. Future land use proposals near these areas with impairments will require strict compliance with all existing regulations pertaining to pollutant discharges to ensure that impairments will not be worsened. As the Draft General Plan is implemented, all future developments will also be required to comply with all existing regulations pertaining to pollutant discharges to avoid the creation of new water quality impairments within the receiving waters throughout the City.

Within the Draft General Plan, specific policies have been put in place in order to limit pollutant discharge to receiving waters and the discharge of identified pollutants to an already impaired water body. Specific policies that address potential water quality impacts include the following:

- ~~CE-E.1~~ 1. _____ Continue to develop and implement public education programs;
- ~~CE-E.2~~ 2. _____ Apply water quality protection measures to land development projects early in the process (during project design 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;
- ~~CE-E.3~~ 3. _____ Require contractors to comply with accepted storm water pollution prevention planning practices for all projects;
- ~~CE-E.4~~ 4. _____ Continue to participate in the development and implementation of Watershed Management Plans for water quality and habitat protection;
- ~~CE-E.5~~ 5. _____ Assure that City departments continue to use “Best ~~Management~~ Practice” procedures so that water quality objectives are routinely implemented;
- ~~CE-E.6~~ 6. _____ 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;
- ~~PF-G.1~~ 7. _____ 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;
- ~~PF-G.2~~ 8. _____ Install infrastructure that, where feasible, includes components to capture, minimize, and prevent pollutants in urban runoff from reaching receiving waters and our potable water supplies;
- ~~PF-G.3~~ 9. _____ Meet or exceed regulatory mandates in a cost-effective manner monitored through performance measures;
- ~~PF-G.4~~ 10. _____ Develop and employ a strategic plan ~~Master Drainage Plans~~ for the City’s watersheds to foster a comprehensive approach to storm water infrastructure improvements; and

~~PE-G.5~~ **11.** 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.

The above policies, along with adherence to federal, state, and local water quality regulations, serve to preclude or reduce significant impacts to a degree, but cannot guarantee that all future project level impacts will be avoided or mitigated to a level less than significant. Therefore, impacts associated with pollutant discharge may be significant at the program level. The Mitigation Framework has been identified to reduce these program level impacts.

New pollutants of concern may be identified for which a suitable treatment BMP may not be identified in the applicable regulations. In which case, their impacts may not be precluded or mitigating to a level less than significant.

The Mitigation Framework requires future development projects to be sited and designed to minimize impacts to receiving waters, in particular the discharge of identified pollutants to an already impaired water body. Prior to approval of any permit for a future project, the City must ensure that any impacts to receiving waters are precluded or, where necessary, mitigated in accordance with the requirements of the City of San Diego and other appropriate agencies (e.g., SDRWQCB). In accordance with the City of San Diego Stormwater Standards Manual, development must be designed to incorporate stormwater improvements, both off- and on-site. Because the degree of impact and applicability, feasibility, and success of these measures cannot be adequately known for each specific project at this program level of analysis, the program level impact related to pollutant discharge may remain significant and unavoidable.

Could implementation of the Draft General Plan otherwise impact local and regional water quality, including groundwater?

As mentioned above, the implementation of the Draft General Plan anticipates that future growth will likely occur in existing urbanized areas and that community plan amendments and updates will identify areas to focus this growth. Increased pollution discharge, resulting from the growth in population around transit corridors, has the potential to otherwise create a significant impact to local and regional water quality. Because most of the water bodies in San Diego are part of a hydrologic system, rather than stand alone entities, water pollution anywhere in the system has the potential to affect the entire system. The local hydrologic system does not follow jurisdictional boundaries, thus all jurisdictions cooperatively work to reduce impacts to the water quality of the region. This cooperation is established under the NPDES Municipal Permit, which requires Copermittees to collaborate on the development of a WURMP for each watershed. The WURMP documents address high priority storm water quality issues found within the various watersheds. Under the Draft General Plan, policies have been established to ensure that the City complies with the WURMP documents. Those policies include: ~~CE E.4~~ Continue to participate in the development and implementation of Watershed Management Plans for water quality and habitat protection; and ~~PE-G.6~~ Pursue **Identify** partnerships and collaborative efforts to sponsor and coordinate pollution prevention BMPs that benefit storm water infrastructure maintenance and improvements. The above

policies serve to reduce impacts to a degree, but cannot guarantee that all future project level impacts will be avoided or mitigated to a level less than significant.

Compliance of the WURMP documents by the City of San Diego and other jurisdictions within the region's watersheds will also help prevent or reduce significant water quality impacts from individual jurisdictions as well as collective impacts from all jurisdictions within the watershed. Although a small project within a single community may not impact regional water quality, when considered collectively with all projects within the watershed, there is the potential for significant environmental impact from the amalgamation of other closely related projects. Any pollution caused by growth within the City of San Diego would be combined with pollution from growth from other cities, which collectively could impact local and regional water quality. Therefore, strict compliance with the WURMP documents is essential to prevent or reduce significant impacts to regional water quality. Although every measure will be taken to limit individual and collective water quality impacts through the WURMP process, strict compliance by all project proponents in all jurisdictions cannot be guaranteed. Therefore, there is the potential for significant impacts to regional water quality at the program level.

Future growth and development also has the potential to create impacts to groundwater quality. Groundwater degradation takes three forms: stock depletion, contamination, and secondary problems such as land subsidence and saline intrusion. Historically and presently, groundwater is not considered a source of potable water for the City, although small amounts have been used for irrigation purposes. There are several groundwater sources throughout San Diego County; however, there are challenges associated with their development. The San Diego Formation appears to be the major aquifer in the vicinity of the City, and due to its confined characteristics, it does not appear to recharge naturally at a useful rate. In addition, San Diego's four main alluvial basins contain brackish groundwater, which may require desalination before the supply could be used for potable use. Additionally, there could also be potential inter-jurisdictional and water rights issues regarding the City's use of the basins because they extend beyond the boundaries of the City's overlaying land. Since groundwater is not considered a source of potable water, there are no significant impacts from stock depletion as well as land subsidence or new saline intrusion anticipated.

As with urban runoff, groundwater contamination can often be traced to anthropogenic sources. Illegal dumping can lead to groundwater impacts. If a site is subject to illegal dumping, contaminants from the surface have the potential to percolate through soils into the groundwater, thus contaminating it. As more people are introduced to a community and more development occurs, there is greater potential for groundwater degradation from these anthropogenic sources. Although groundwater is not considered a water resource within the plan area, there is potential for utilization in the future. As such, protecting groundwater quality will be necessary for future use. Although compliance with all water quality standards and guidelines will be instituted by the City, strict observance of all regulations cannot be guaranteed communitywide.

Implementation of the above policies and compliance with the WURMP would serve to avoid or reduce impacts to a degree, but cannot guarantee that all future project level impacts will be avoided or mitigated to a level less than significant. Because the degree of impact and applicability, feasibility, and success of water quality protection these measures cannot be

accurately predicted for each specific project at this time, the program-level impact related to local and regional water quality is considered significant and unavoidable.

3.17.4 Mitigation Framework

Goals, policies, and recommendations enacted by the City combined with the federal, state and local regulations described above provide a framework for developing project-level water quality protection measures for future discretionary projects. The City's process for the evaluation of discretionary projects includes environmental review and documentation pursuant to CEQA as well as an analysis of those projects for consistency with the goals, policies and recommendations of the General Plan. In general, implementation of the above policies and compliance with the WURMP would preclude water quality impacts. Compliance with the standards is required of all projects and is not considered to be mitigation. However, it is possible that for certain projects, adherence to the regulations may not adequately protect water quality, and such future projects would require additional measures to avoid or reduce significant water quality impacts. These additional measures would be considered mitigation.

For each future discretionary project requiring, mitigation (i.e., measures that go beyond what is required by existing regulations), site-specific measures will be identified that reduce significant project-level impacts to less than significant or the project-level impact may remain significant and unavoidable where no feasible mitigation exists. Where mitigation is determined to be necessary and feasible, these measures will be included in a Mitigation Monitoring and Reporting Program (MMRP) for the project. Below is a summary of general measures that may be implemented to preclude impacts. These measure may be updated, expanded and refined when applied to specific future projects based on project-specific design and changes in existing conditions, and local, state and federal laws. The Mitigation Framework is as follows:

- Future projects must be sited and designed to minimize impacts to receiving waters, in particular the discharge of identified pollutants to an already impaired water body. Prior to approval of any entitlement for a future project, the City must ensure that any impacts to receiving waters will be precluded and, if necessary, mitigated in accordance with the requirements of the City of San Diego and other appropriate agencies (e.g., RWQCB). To prevent erosion, siltation, and transport of urban pollutants, future development must be designed to incorporate any applicable stormwater improvements, both off- and on-site in accordance with the City of San Diego Stormwater Standards Manual. Stormwater improvements and water quality protection measures that may be required of future developments, include:
 - Increasing on-site filtration.
 - Preserving, restoring or incorporating natural drainage systems into site design.
 - Directing concentrated flows away from MHPA and open space areas. If not possible, drainage must be directed into sedimentation basins, grassy swales or mechanical trapping devices prior to draining into the MHPA or open space areas.
 - Reducing the amount of impervious surfaces through selection of materials, site planning, and the narrowing of street widths, where possible.

- Increasing the use of vegetation in drainage design.
- Maintaining landscape design standards that minimize the use of pesticides and herbicides.
- To the extent feasible, avoiding development of areas particularly susceptible to erosion and sediment loss.

3.17.5 Significance of Impact with Mitigation Measures

Because the degree of future impacts and applicability, feasibility, and success of future mitigation measures cannot be adequately known for each specific future project at this program level of analysis, the program-level impacts related to water quality remains significant and unavoidable.

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3.18 THEORETICAL BUILD OUT

The theoretical build-out scenario is included in the Draft General Plan Program Environmental Impact Report (Program EIR) to provide the reader with the ability to understand the worst-case scenario of full, but theoretical development of the General Plan.¹ The theoretical build-out scenario demonstrates residential and non-residential development levels that could theoretically be achieved by the Draft General Plan. The Draft General Plan does not change adopted plan land use or zoning designations currently in place, but provides land use categories that may be used during community plan updates and amendments. Since the Draft General Plan does not propose changing adopted community plan land use or zoning designations, the density and floor area ratio (FAR) proposed in the theoretical maximum build out of all lands was estimated using the assigned land use designations from adopted community plans and zoning designations.

Unlike a forecast, the theoretical build-out scenario does not have a time horizon, such as 2030, nor does it include transportation, demographic, existing land use, or economic assumptions typically used by a forecasted model to provide more realistic land use planning data. Therefore, due to regulatory constraints, physical constraints, and foreseeable market conditions, realization of this scenario is highly unlikely, but the program EIR includes an analysis of this scenario because the General Plan land use categories do provide the theoretical capacity for residential units and non-residential building square feet to allow the build-out estimates presented on **Tables 3.18-1** and **3.18-2** respectively.

Theoretical build out of land within the City of San Diego would be a substantial change in the level of residential and non-residential development described in the Existing Conditions.

Multifamily Residential Development

Under the theoretical build-out scenario, when compared to the Existing Conditions, there would be a 54 percent increase in total housing units (which would be predominantly multifamily) and a 439 percent increase in non-residential (commercial, industrial and public) building square feet. Theoretical build out assumes full development of all multifamily designated land in Coastal, Post World War II Suburban (1945-1970), and Pre World War II (pre 1945) communities at the maximum allowable community plan designated density (units per acre). It also assumes that full development build out of the 53,100 units identified in the 2006 adopted Downtown Community Plan. The theoretical build out scenario does not assume any additional development of multifamily units beyond the 2030 Forecast in Master Planned Suburban (1970-present) and Newer Urban (1960-present) communities. Refer to the notes listed in Table 3.18-1 for additional details.

Given the generalized, highly theoretical nature of this build-out analysis, the analysis did not account for variations due to the implementation of additional regulations or site-specific conditions that could affect attainment of density. **Specifically for Post World War II Suburban and Pre World War II communities, the theoretical build-out scenario does not consider existing**

¹ This section was provided to be responsive to a 2003 court decision regarding the El Dorado County General Plan which required that the El Dorado County address theoretical build-out.

built conditions, type of ownership, historic value, regulatory constraints and physical constraints. For example, Regulations, such as those addressing parking requirements and Environmentally Sensitive Lands regulations may make attainment of maximum densities infeasible, and site specific easements may restrict development of certain properties to levels below what is permitted by the base zoning ordinance. For example, the zoning may allow the development of a certain number of units on a parcel, but a portion of the site could be constrained due to environmentally sensitive lands and/or height limitations; thereby reducing the feasibility of the parcel developing at the maximum allowed units.

The analysis did not include density bonus regulations that could allow for additional units. The analysis assumes that existing mobile homes and single-family units located on adopted community plan designated multifamily land would be developed for multifamily units as part of the theoretical build-out scenario. This assumes that all existing units on a parcel are either demolished and new residential units are constructed or that additional units are added to the parcel to the maximum allowed. For example, a parcel may have 28 existing multifamily units on-site; however, the units per acre (density) would allow up to a total of 30 multifamily units. The theoretical built out scenario assumes that the existing 28 units would be demolished and replaced with 30 units for an increase of two units. While theoretically possible, the likelihood of this occurring for a slight increase in total units is unrealistic due to the high cost of development.

The realization of this scenario is highly unlikely, but the program EIR includes an analysis of this scenario because the General Plan land use categories do provide the theoretical capacity for residential units. Another variable is that decision-makers have the authority to approve, deny, or modify discretionary projects based on site-specific factors and project level environmental analysis.

Non-Residential Development

For non-residential development, The-the theoretical build out scenario also assumes the full utilization of the allowable zoning ordinance floor area ratio (FAR) (to derive total building square footage except for Downtown) for land that is designated for retail, office, and industrial uses under the Draft General Plan. The theoretical build-out scenario includes the build out building square footage from the 2006 adopted Downtown Community Plan. Although theoretically possible based only on the allowable maximum floor area ratio, there could be constraints in place that limit or reduce the feasibility of additional square footage at the maximum floor area ratio, such as physical constraints, regulatory or environmental constraints, or economic market conditions. For example, a parcel may allow the development of maximum amount square footage based on the FAR, but a portion of the site could be constrained by environmentally sensitive lands, which would reduce the site area and could affect the ability to provide the required amount of parking; thereby reducing the feasibility of the parcel developing at the maximum allowable FAR. Another variable is that decision-makers have the authority to approve, deny, or modify discretionary projects based on site-specific factors.

SANDAG 2030 Forecast (Year 2030 Scenario)

As part of the SANDAG forecast process, the City provides land use inputs to SANDAG addressing the feasibility of development to existing conditions and constraints that may limit future development. By 2030, SANDAG forecasts that approximately 107,400 additional multifamily units could be built within the City, which is a 54 percent increase in multifamily units from 2004 consistent with adopted community plan land use designations. Overall, when including the additional single-family units, SANDAG forecasts a 24 percent increase in the total number of units by 2030.

It is important to note that the SANDAG 2030 Regional Growth Forecast does not forecast building square footage. The City based the 2004 and 2030 building square feet estimates on the SANDAG (Series 11) 2030 Regional Growth Forecast for Civilian Employment. For the purposes of this Program EIR, the City derived the building square footage estimates from the forecast by using typical square feet per employee by land use designation (retail, office, and industrial) ratios. The City used building square footage estimates for 2030, so that it could be compared relationship to the theoretical build out scenario as part of the environmental analysis. Since uses with lower employment densities, such as industrial, typically have more square footage per employee than uses with higher employment densities, such as office, it is difficult to use gross estimate of total square footage as an indicator of employment growth.

The SANDAG 2030 forecast uses an econometric forecast for regional employment population growth for the San Diego region based on national and statewide forecasts that incorporate demographic and economic factors. SANDAG uses employees per acre by land use types rather than building square footage in the forecast process. Between 2004 and 2030, SANDAG forecasts that the civilian employment will increase by 24 percent in the City.

SANDAG forecasts that the percentage increase for both new housing units and civilian jobs are at 24 percent for the City. The forecast indicates that jobs to housing ratio (civilian employment per housing unit) increases less than one percent from 1.60 in 2004 to 1.61 by 2030. During this same period, that employment density in the City increases by 10 percent from 24.8 to 27.4 civilian employments per developed employment acre.

Comparison between the Theoretical Build Out and the SANDAG 2030 Forecast Scenarios

Although the theoretical build-out scenario does not have a time horizon associated with it, there could be substantially more development than forecasted under the Year 2030 scenario. When comparing the two scenarios, there could be 24 percent more total housing units (which would be predominantly multifamily) and 298 percent more non-residential building square feet. The theoretical build-out scenario assumes for residential development that existing land uses, located on plan designated multifamily land, would redevelop or infill at the maximum point of their adopted community plan residential density range. For non-residential (commercial and industrial uses), the analysis assumes that all existing land uses, located on plan designated non-residential land, would redevelop or infill at the maximum allowed zoning ordinance FAR.

**Table 3.18-1
Comparison between the Theoretical Build Out Scenario and
the SANDAG 2030 Forecast Scenario for Housing Units**

Housing Units	SANDAG 2030 Forecast				Theoretical Build Out				
	Base Year	Horizon Year	Change from Existing Conditions		Theoretical	Change from Existing Conditions		Change from 2030 Forecast	
	2004	2030	Numeric	Percent	Build Out	Numeric	Percent	Numeric	Percent
Single Family	285,435	297,759	12,324	4%	272,200	-13,235	-5%	-25,599	-9%
Multifamily	199,188	306,655	107,467	54%	480,100	280,912	141%	173,445	57%
Mobile Homes	5,625	5,635	10	0%	2,100	-3,525	-63%	-3,535	-63%
Total	490,266	610,049	119,783	24%	754,400	264,134	54%	144,351	24%

Notes:

- 1) The theoretical build-out scenario was prepared solely for the purposes of the General Plan Environmental Impact Report only and should not be used for any other long range planning purposes.
- 2) Build out generally refers to the theoretical maximum build out of all lands within the planning area in accordance with assigned land use designations.
- 3) Theoretical build-out scenario assumes full development of all multifamily designated land in Coastal, Post-World War II Suburban (1945-1970), and Pre-World War II (pre 1945) communities at the maximum allowable community plan designated density (units per acre).
- 4) Theoretical build-out does scenario not assume any additional development of multifamily units beyond the (Series 11) 2030 Forecast in Master Plan Suburbs (1970-present) and Newer Urban (1960-present) communities. Theoretical build out assumes that full development build out of the 53,100 units identified in the 2006 adopted Downtown Community Plan.
- 5) The reduction of single family units is the result of existing single family units located on adopted community plan designated multifamily land that would be developed for multifamily units as part of the theoretical build out.
- 6) The reduction of mobile units is the result of existing mobile units located on adopted community plan designated multifamily land that would be developed for multifamily units as part of the theoretical build out.
- 7) Theoretical build out scenario does not assume any additional development of single-family units beyond the (Series 11) 2030 Forecast.
- 8) Multifamily units include units that are developed on mixed-use designated land.
- 9) Although theoretically possible based only on the allowable maximum density, there could be constraints in place that would limit or reduce the feasibility of additional units at the maximum density, such as physical constraints, regulatory constraints, or market conditions.
- 10) The (Series 11) 2030 Region Growth Forecast allocated additional multifamily units to multifamily designated land considered more feasible for future development.
- 11) The (Series 11) 2030 Region Growth Forecast was approved by the SANDAG Board for planning purposes in September 2006. The 2030 Forecast uses the Year 2004 as a base year and 2030 as the forecast horizon year.

**Table 3.18-2
Comparison between the Theoretical Build Out Scenario and
the SANDAG 2030 Forecast Scenario for Total Non-Residential Square Feet**

SANDAG 2030 Forecast (Estimates)				Theoretical Build Out				
Base Year	Horizon Year	Change from Existing Conditions		Theoretical	Change from Existing Conditions		Change from 2030 Forecast	
2004	2030	Numeric	Percent	Build Out	Numeric	Percent	Numeric	Percent
203,833,250	275,702,300	71,869,050	35%	1,097,680,700	893,847,450	439%	821,978,400	298%

Notes:

- 1) The theoretical build-out scenario was prepared solely for the purposes of the General Plan Environmental Impact Report only and should not be used for any other long range planning purposes.
- 2) Build -out scenario refers to the theoretical maximum build out of all lands within the planning area in accordance with assigned land use designations.
- 3) The SANDAG 2030 Regional Growth Forecast does not forecast building square footage. The 2004 and 2030 building square feet estimates are based on the SANDAG (Series 11) 2030 Regional Growth Forecast for Civilian Employment. The building estimates were derived from the forecast by using typical square feet per employee by land use designation (retail, office, and industrial) ratios as in the table below.

Generalized Land Use Type	Description	Square Foot per Employee
Visitor Commercial	Hotel/Motel (Lo-Rise)	1400
Visitor Commercial	Hotel/Motel (Hi-Rise)	1000
Visitor Commercial	Resort	1000
Industrial	Heavy Industry	550
Industrial	Industrial Parks	400
Industrial	Light Industry-General	400
Industrial	Warehousing and Public	800
Retail Commercial	Wholesale Trade	500
Retail Commercial	Regional Shopping	450
Retail Commercial	Community Shopping	400
Retail Commercial	Neighborhood Shopping	350
Retail Commercial	Specialty Commercial	300
Retail Commercial	Automobile Dealerships	300
Retail Commercial	Store-Front	300
Retail Commercial	Other Retail Trade	300
Office Commercial	Office (High-Rise)	300
Office Commercial	Office (Lo-Rise)	300
Office Commercial	Government Office/Civic	300

Notes:

- 1) The theoretical build-out scenario for square feet assumes the full utilization of the allowable zoning ordinance floor area ratio (FAR) for land that is designated for retail, office, and industrial uses, except for downtown. The theoretical build-out scenario includes the build out building square footage that is reported in the 2006 adopted Downtown Community Plan.
- 2) Although theoretically possible based only on the allowable maximum floor area ratio, there could be constraints in place that would limit or reduce the feasibility of additional square footage at the maximum floor area ratio, such as physical constraints, regulatory constraints, or market conditions.
- 3) The (Series 11) 2030 Region Growth Forecast allocated additional multifamily units to multifamily designated land considered more feasible for future development.
- 4) The (Series 11) 2030 Region Growth Forecast was approved by the SANDAG Board for planning purposes in September 2006. The 2030 Forecast uses the Year 2004 as a base year and 2030 as the forecast horizon year.

Table 3.18-3
SANDAG 2030 Forecast for Civilian Employment

<u>Base Year</u>	<u>Horizon Year</u>	<u>Change from Existing Conditions</u>		<u>Remaining Forecast Capacity</u>
<u>2004</u>	<u>2030</u>	<u>Numeric</u>	<u>Percent</u>	<u>Beyond 2030</u>
<u>782,245</u>	<u>980,374</u>	<u>198,129</u>	<u>25%</u>	<u>74,133</u>

3.18.1 Agricultural Resources

Although the theoretical build-out scenario does not assume the development of land designated or zoned for agricultural uses and there are not any Williamson Act designated farmlands within the City, the level of development associated with this scenario would have the potential to impair the productivity of agricultural lands because of effects caused by greater residential and employment population growth. The increase in population associated with this scenario would limit the ability of farmers to use pesticides, which is essential for agricultural resources. The increase in population would also have higher water demands, which would affect water supplies currently used for farming.

It is infeasible at this program EIR level to provide specific mitigation that would reduce impacts to a less than significant level since no specific development projects are proposed. Due to the level of development under the theoretical build-out scenario, and the lack of specific development projects and associated project-level mitigation, the impacts to agricultural resources would be significant and unavoidable.

3.18.2 Air Quality

Under the theoretical build-out scenario, the increase in population associated with the significant increase in residential and non-residential development would add a substantial number of automobile, train, truck, transit, or airplane trips or stationary source emissions, which could potentially affect San Diego's ability to meet regional, state and federal clean air standards, including the Regional Air Quality Strategy or State Implementation Plan. Under the Year 2030 scenario, infill and redevelopment of residential and non-residential uses would occur in close proximity to transit stations and corridors. This is intended to relieve some of the increased automobile trips that would have otherwise occurred without alternative transportation planning in mind and could positively affect San Diego's air quality.

Under the theoretical build-out scenario, the increase in development and population could also create air emissions that could substantially deteriorate ambient air quality, including the exposure of sensitive receptors to substantial pollutant concentrations. The construction needed to create this increase in density would be a considerable source of NO_x, CO₂, and ROG from the diesel fuel used to operate construction equipment. Construction activities also associated

with the theoretical build-out scenario would generate additional vehicle trips by construction workers traveling to and from construction sites. Therefore, implementation of the theoretical build-out scenario would result in localized short-term air quality impacts.

Although mitigation framework measures summarized in **Section 3.2.4** would reduce impacts, the magnitude of change in the level of residential and non-residential development under the theoretical build-out scenario would result in impacts to air quality that could not be mitigated without major advancements in technology or restrictions on travel. It is also infeasible at this program EIR level to provide more specific mitigation that would reduce impacts to a less than significant level since no specific development projects are known. Therefore, impacts would be significant and unavoidable.

3.18.3 Biological Resources

Under the theoretical build-out scenario the level of development may not substantially alter the expected development footprint, but the infill and redevelopment associated with this scenario would lead to a considerably larger residential and employment population within the City, beyond the anticipated growth scenarios forecasted by SANDAG and planned for in the Year 2030 scenario. Although additional development under theoretical build-out scenario would not necessarily encroach into protected habitats, it would be reasonable to assume that an increase in impacts on the edge of habitats (including wetlands) would occur from increased population.

Habitat areas are easily degraded by anthropogenic influences, and the growth in residential and employment population resulting from the build-out scenario could lead to impacts to biologic resources. Unique, rare, endangered, sensitive, or fully protected species of plants or animals could be more vulnerable due to the increased likelihood of interaction between humans and habitat areas. Many of the areas within the City that are designated for preservation do allow for passive recreational uses, and the admittance of dogs. Increased use of preserve areas, even for passive recreation, can interfere with species functions, including the movements of resident or migratory fish or wildlife species.

Under the theoretical build-out scenario, the increased level of development could also result in increased noise levels throughout the City. Construction activities associated with the theoretical build-out scenario would generate elevated noise from construction. An increase in automobile, truck, transit, rail, aircraft traffic associated with residential and employment population growth would lead to a general increase in ambient noise levels. An increase in noise levels has the potential to affect behavioral and physiological responses in noise-sensitive wildlife receptors. Adverse responses to increased noise may include hearing loss or the temporary masking of vocalizations commonly used during the breeding season, nest abandonment, and decrease in predator awareness, thereby resulting in a decrease in reproductive and overall fitness of certain animal species.

Although mitigation framework measures summarized in Section 3.3.4 would reduce impacts to biologic resources, the magnitude of change under the theoretical build-out scenario would result in substantial impacts to biologic resources. It is infeasible at this program EIR level to provide

more specific mitigation that would reduce impacts to a less than significant level because no specific projects are known. Therefore, these impacts would be significant and unavoidable.

3.18.4 Geologic Conditions

Under the theoretical build-out scenario, there could be increased development on steep slopes or areas prone to geologic hazards, which would not occur to the same extent under the Year 2030 scenario. It is assumed that under the theoretical build-out scenario, development will occur at the maximum allowable residential density and non-residential FAR, but these assumptions do not account for geologic constraints that could affect the level of development. Many of the existing developments within the City are already built-out to the maximum extent feasible under the constraints that the surrounding geologic conditions impose, which may be less than theoretically allowed. The increased level of development associated with the theoretical build-out scenario could require the alterations of cliffs, hillsides, and shorelines.

Although mitigation framework measures summarized in **Section 3.4.4** seek to reduce the impacts and risks, in certain instances under a theoretical build-out scenario, structures would be located on geological units or soils that are unstable or that would become unstable and potentially result in on- or off-site landslides, lateral spreading, subsidence, liquefaction or collapse. As a result, a greater number of people and properties could be exposed to geologic hazards such as groundshaking, fault rupture, landslides, mudslides, ground failure, or similar hazards even though available mitigation would be applied. Also, since no specific development projects are identified, it is infeasible at this program EIR level to provide more specific mitigation that would reduce impacts to a less than significant level. Therefore, these impacts would be significant and unavoidable.

3.18.5 Health and Safety

Under the theoretical build-out scenario, development could occur on contaminated sites located throughout the City. This increased level of development could also lead to an increase in the number of underground storage tanks and thus, potentially more leaking underground storage tanks. New development and redevelopment could result in the increased use, transport, and disposal volumes of hazardous materials within the City. All of these conditions would create a much more substantial risk of exposure to people or sensitive receptors to potential health hazards over the Year 2030 scenario because of the amount of volume of development that would have to occur to create theoretical build-out conditions.

Under the theoretical build-out scenario, the increased level of development would also result in increased growth in residential and employment population. As a result, a greater number of people and structures could be at risk of significant loss, injury or death from wildland fires, flooding, seiches, tsunamis, mudflows or aircraft operations accidents. The adopted emergency response plan and emergency evacuation plan are not based on the increased level of development associated with the theoretical build-out scenario as a result they would need to be updated to address the increased population.

Although mitigation framework measures summarized in **Section 3.4.4** would lessen impacts, due to the magnitude of change in the level of residential and non-residential development under the theoretical build-out scenario and associated population growth, reduction to a less than significant level is unlikely. Also, since no specific development projects are proposed, it is infeasible at this program EIR level to provide more specific mitigation measures that would reduce impacts to a less than significant level. Therefore, impacts to community health and safety would be significant and unavoidable.

3.18.6 Historic Resources

Under the theoretical build-out scenario, extensive grading of large amounts of area within the City could be necessary - much more than would be anticipated under the Year 2030 scenario. Because the majority of these projects would be infill and redevelopment, this grading would occur on previously graded surfaces. Previously excavated areas are generally considered to have a low potential for archaeological resources, since the soil containing such resources has been removed. Sites that have been minimally excavated in the past (e.g., undeveloped parcels, vacant lots and lots containing surface parking; undeveloped areas around historic buildings; under buildings with post, pier, slab, or shallow wall foundations without basements, etc.) have the greatest likelihood of encountering archaeological resources.

Under the theoretical build-out scenario, it is assumed that future development would involve mass grading, road construction, underground parking areas, sea walls, underground tanks, new pipelines or replacement of pipelines, potentially at a lower depth than the previous development. It is assumed that many future projects could also require subterranean parking, causing the likelihood of impacts of historical resources to amplify because of the increased depth of grading. The demolition of buildings and surface clearance could result in impacts to archaeological resources. Within the City, prehistoric human remains have been uncovered during both previous archaeological investigations and grading activities. The potential for encountering human remains during construction development activities is possible and impacts to human remains under the theoretical build-out scenario could occur.

Since the theoretical build-out scenario does not include assumptions concerning the preservation of historical resources, the substantial redevelopment of all Pre-World War II communities under the theoretical build-out scenario has the potential to cause significant impacts to architectural resources. Many of these structures (though not recognized on any official historic preservation list) still contain valuable elements of San Diego history. The total redevelopment of these areas under the theoretical build-out scenario would be a significant loss to the historic record of the City.

It is infeasible at this program EIR level to provide specific mitigation that would reduce impacts to a less than significant level since no specific development projects are proposed. Due to the magnitude of grading that would be required to support the infill and redevelopment of residential and non-residential densities under the theoretical build-out scenario, the potential for adverse physical or aesthetic effects to prehistoric, historic, or architecturally significant buildings, structures, objects, or sites; or in impacts to existing religious or sacred uses within the

City or the disturbance of any human remains, including those interred outside formal cemeteries would be significant and unavoidable.

3.18.7 Hydrology

Under the theoretical build-out scenario, there would be substantially more development than that forecasted under the Year 2030 scenario. When comparing the two, there would be 24 percent more total housing units (which would be predominantly multifamily) and 298 percent more non-residential building square feet. This would also lead to a substantial change in absorption rates, drainage patterns, and the rate of surface runoff. To achieve the theoretical build-out scenario, it was assumed for residential development that existing land uses located on plan designated multifamily land would redevelop or infill at the maximum point of their adopted community plan residential density range. For non-residential (commercial and industrial uses) it is assumed that all existing land uses located on plan designated non-residential land would redevelop or infill at the maximum allowed zoning ordinance floor area ratio. This level of development under the theoretical build-out scenario could lead to considerably more non-permeable surface added to the environment. This additional non-permeable surface area would limit absorption rates, radically alter drainage patterns, and substantially increase the rate of surface runoff.

Although mitigation framework measures summarized in **Section 3.7.4** would reduce impacts, it is infeasible at this program EIR level to provide more specific mitigation that would reduce impacts to a less than significant level. Due to the magnitude of change in the level of residential and non-residential development under the theoretical build-out scenario and the lack of specific development projects and associated project-level mitigation, the impacts to absorption rates, drainage patterns, and the rate of surface runoff would be significant and unavoidable.

3.18.8 Land Use

Under the theoretical build-out scenario, the increased level of development could also result in physically dividing established communities or creating incompatibilities between adjacent land use densities and intensities throughout the City. The analysis assumes that existing mobile homes and single-family units located on adopted community plan designated multifamily land would be developed for multifamily units as part of the theoretical build-out scenario. The theoretical scenario also assumes the full utilization of the allowable zoning ordinance floor area ratio for land that is designated for retail, office, and industrial uses under the Draft General Plan. It is likely that under the theoretical build-out scenario, small parcels will be consolidated as part of larger full block developments.

Although the mitigation framework measures summarized in **Section 3.8.4** would reduce impacts, it is infeasible at this program EIR level to provide more specific mitigation that would reduce impacts to a less than significant level, since specific development projects are not known. Due to the level of development under the theoretical build-out scenario and the lack of specific development projects and associated project-level mitigation, impacts related to land use would be significant and unavoidable under the theoretical build-out scenario.

3.18.9 Mineral Resources

Although development would limit access to mineral resources and possibly limit the ability for extraction, the construction needed to create this increase in density would considerably affect the supply of regional mineral resources, particularly sand and gravel. The use of regionally mined materials for development is desirable as it reduces the need for trucking materials over long distances, thus reducing costs. Regional sand and gravel sources could be depleted and unable to support the magnitude of development required under the theoretical build-out scenario. As such, the combination of the magnitude of change in the level of development under this scenario and the lack of available mitigation measures to lessen these impacts would result in significant and unavoidable impacts to mineral resources (e.g. sand and gravel).

3.18.10 Noise

Under the theoretical build-out scenario, the increased level of development could also result in increased noise levels throughout the City. Construction activities associated with the theoretical build-out scenario would generate elevated noise from construction. An increase in automobile, truck, transit, rail, aircraft traffic associated with residential and employment population growth would lead to a general increase in ambient noise levels. An increase in noise levels has the potential to affect noise-sensitive receptors and uses.

Although mitigation framework measures summarized in **Section 3.10.4** would reduce impacts, it is infeasible at this program EIR level to provide more specific mitigation that would reduce impacts to a less than significant level, since specific development projects are not known. Due to the magnitude of change in the level of residential and non-residential development under the theoretical build-out scenario and the lack of specific development projects and associated project-level mitigation, and all impacts to noise would be significant and unavoidable under the theoretical build-out scenario.

3.18.11 Paleontological Resources

Under the theoretical build-out scenario, the increased level of development could result in extensive grading of areas within the City, which would be more than is anticipated under the Year 2030 scenario. It is likely that under this scenario grading would occur on previously graded surfaces since the majority of the future development would be associated with infill and redevelopment. The bedrock formation on areas previously graded will be closer to the surface, so even shallow excavations, such as building footings, may extend into formations. Projects involving extensive grading, road construction, underground parking areas, sea walls, underground tanks, or new pipelines or replacement of pipelines at a lower depth than the original installation could extend into valuable formations. It is likely that under the theoretical build-out scenario, many projects would require subterranean parking, causing the likelihood of impacts to paleontological resources to increase. The increase in residential and employment population associated with the theoretical build-out scenario could also require additional roads, pipelines, storage tanks and other infrastructure, which could require grading or subterranean investigation.

Due to the magnitude of grading that could be required to support development under theoretical build out, and the lack of specific development projects and associated project-level mitigation, the impacts to unique paleontological resources or a geologic formations possessing a medium to high fossil bearing potential would be significant and unavoidable.

3.18.12 Population and Housing

Under the theoretical build-out scenario, it is assumed that there would be a 24 percent increase in the total amount of housing units above the forecasted Year 2030 scenario. While it is likely that the increase supply of housing units could provide for additional housing opportunities and the replacement of substandard housing with newer housing units, it is also likely that residents of older housing units could be displaced as a result of the demolition and replacement of older housing units with newer and more expensive housing units. This displacement could be particularly substantial in the mobile home communities. In some instances, people could have access to City, state, and federal programs providing housing assistance.

Although mitigation framework measures summarized in **Section 3.12.4** would seek to reduce displacement impacts, it is infeasible at this program EIR level to provide mitigation that can reduce such impacts to a less than significant level, since specific development projects are not known. For this reason and due to the magnitude of change in the level of residential and non-residential development under the theoretical build-out scenario, the physical environmental effects related to the construction of replacement housing would be significant and unavoidable.

3.18.13 Public Services and Facilities

Under the theoretical build-out scenario, it is assumed that there would be a 24 percent increase in the total amount of housing units above the forecasted Year 2030 scenario. This could lead to a residential population within the City, which could require increased public services. This could create need for new or expanded public facilities in order to maintain adequate public service levels. The construction of new and expanded facilities could cause environmental impacts.

It is likely that under the theoretical build-out scenario existing and planned park and recreation facilities may not be able to adequately serve the increased residential population. Based on the 1979 General Plan population-to-park-acreage standards, many of the older urbanized areas are deficient in park acreage in relation to their current population. Fee structures identified in the mitigation framework **Section 3.13.4** would help to increase park and recreation facilities as part of the development process; however, under the theoretical build-out scenario, it is not likely that adequate park and recreation facilities could be provided to accommodate the growth beyond land currently designated for park uses. It is assumed that all residential and non-residential plan designated land would be built to their full development potential.

Mitigation framework measures summarized in **Section 3.13.4** would reduce these impacts; however, it is infeasible at this program EIR level to provide more specific mitigation that would reduce such impacts to a less than significant level since no specific public facility improvement project information is known. The considerable population growth also associated with the theoretical build-out scenario can be expected to create substantial impacts associated with construction of new or expanded public facilities needed to accommodate a substantial increase in the use of park and recreation facilities. For these reasons, these impacts would be significant and unavoidable.

3.18.14 Public Utilities

Under the theoretical build-out scenario, the increased level of development could result in an increased demand for public utilities beyond projected supplies of water, electrical power, fuel, or other forms of energy. Typically, most utility service providers in the region utilize the SANDAG regional forecast data. The increased demand for utilities under the theoretical build-out scenario could result in the construction of new or physically altered utilities in order to maintain service objectives which could cause significant environmental impacts. -

Although mitigation framework measures summarized in **Section 3.14.4** would reduce impacts, it is infeasible at this program EIR level to provide more specific mitigation that would reduce impacts to a less than significant level, since specific development projects are not known. Due to the magnitude of change in the level of residential and non-residential development under the theoretical build-out scenario and the lack of specific development projects and associated project-level mitigation, impacts related to the construction or alteration of public utilities would be significant and unavoidable under the theoretical build-out scenario.

3.18.15 Transportation/Traffic/Circulation/Parking

Under the theoretical build-out scenario, the increased level of development could result in an increase in the number of roadway miles and percent of daily vehicle miles traveled at a Level of Service E or F on the planned transportation network and circulation system. Transportation planning in the San Diego region including the Year 2030 scenario uses the SANDAG regional forecast for the Year 2030. SANDAG has not produced a forecast using the theoretical build-out scenario; and Citywide and regional transportation plans and policies do not address the population and employment growth associated with a theoretical build-out scenario.

Although the mitigation framework measures summarized in **Section 3.15.4** would reduce impacts, it is infeasible at this program EIR level to provide more specific mitigation that would reduce impacts to a less than significant level, since specific development projects are not known. Due to the magnitude of change in the level of residential and non-residential development under the theoretical build-out scenario and the lack of specific development projects and associated project-level mitigation and the fact that regional transportation plans do not address transportation needs beyond what is anticipated in the Year 2030 forecast, transportation-related impacts would be significant and unavoidable.

3.18.16 Visual Effects and Neighborhood Character

Under the theoretical build-out scenario, the increased level of development could result in a change to neighborhood character. Areas currently occupied by with single-family homes, mobile homes, lower density multifamily homes, such as duplexes, in areas that allow multifamily uses would be replaced with multifamily uses at the maximum allowed community plan density. Existing commercial areas would also be intensified to the maximum allowable FAR. It is also assumed under the build-out scenario that there could be major alterations to the City's topography to accommodate this level of development. View corridors could also be substantially altered or blocked in some areas.

Due to the level of development under the theoretical build-out scenario and the lack of specific development projects and associated project-level mitigation, the impacts to visual effects and neighborhood character would be significant and unavoidable.

3.18.17 Water Quality

Under the theoretical build-out scenario, the increased level of development could result in an increase of non-permeable surface area. Due to the anthropogenic nature of water quality impairments, the growth in residential and employment population required to support the build-out scenario could lead to significant unavoidable impacts to regional water quality. The need for water to support the increased level of development could also require the use of ground water resources, which would also lead to degradation due to the unique attributes of regional aquifers. Significant and unavoidable impacts to groundwater could arise from the theoretical build-out scenario.

4.0 GROWTH INDUCEMENT

A project is defined as growth inducing when it directly or indirectly fosters economic growth, population growth, or additional housing; when it removes obstacles for growth; and/or when it encourages or facilitates other activities that could significantly affect the environment (CEQA Guidelines **Section 15126.2(d)**). The provision or improvements of roadways, utilities, water, and sewer service to an area can induce growth by removing impediments to development. Once services are extended or improved in an area, economic incentives for development exist.

Based on Government Code **Section 65300**, the ~~October 2006~~-Draft General Plan serves as a comprehensive, long-term plan for physical development of the City of San Diego. By definition, the Draft General Plan is intended to manage and address future growth in the City. The Draft General Plan is based on the previously adopted City of Villages strategy. This strategy, as implemented through the Draft General Plan goals and policies, is designed to provide a framework to manage and plan for future population growth in the City of San Diego.

The City of Villages strategy and Draft General Plan goals and policies call for redevelopment, infill, and new growth in compact, mixed-use activity areas that are pedestrian-friendly, centers of community, and linked to the regional transit system. A “village” is a place where residential, commercial, employment, and civic uses are present and integrated. Implementation of the City of Villages strategy and Draft General Plan rely upon the future designation and development of village sites. As identified in the Draft General Plan, factors to consider when locating village sites include capacity for growth, existing and future public facilities, transportation options, community character, and environmental constraints. Actual village locations, precise village boundaries, the specific mix of uses, architectural form, needed public facilities, and the type of public spaces within proposed village areas will be determined through community plan updates or amendments following adoption of the Draft General Plan.

Because less than four percent of the City’s land remains vacant and available for new development, the City of Villages strategy and Draft General Plan policies largely direct housing growth to already developed areas of the City through infill and redevelopment. The population in San Diego will grow whether or not the Draft General Plan is adopted. However, the Draft General Plan Economic Prosperity Element promotes economic expansion through policies that encourage business, education, employment and workforce development. Additional policies are intended to preserve and protect valuable employment land, especially prime industrial land, from conversion to other uses. These policies serve to facilitate expansion and new growth of high quality employment opportunities in the City. Therefore, the Draft General Plan is growth accommodating because it provides direction for the planning and management of population growth and growth inducing in that it facilitates economic expansion.

Most of the areas likely to experience infill and redevelopment activities are already served by public facilities. Improvements to water, sewer, utilities, and the circulation systems may be needed in these areas to accommodate additional population, employment activity and housing units. These infrastructure improvements could further remove existing obstacles to growth in some locations and would also be considered growth inducing.

Pursuant to CEQA Guidelines **Section 15126.2(d)**, “It must not be assumed that growth in any area is necessarily beneficial, detrimental, or of little significance to the environment.”

Notes and References

City of San Diego.

2006 *Capital Improvements Program*. Annual Fiscal Year 2006 Budget.

5.0 CUMULATIVE IMPACTS

5.1 Cumulative Impact Analysis

This section of the EIR provides an analysis of cumulative impacts of the Draft General Plan, as required by §15130 of the California Environmental Quality Act Guidelines (CEQA Guidelines). In addition, an analysis of the global warming impacts of the Draft General Plan is provided in **Section 5.2**. Cumulative impacts are defined in CEQA Guidelines §15355 as two or more individual effects that together create a considerable environmental impact or that compound or increase other impacts. “A cumulative impact occurs from the change in the environment, which results from the incremental impact of the project when added to other closely related past, present, and reasonably foreseeable probable future projects. Cumulative impacts can result from individually minor but collectively significant projects taking place over a period of time” (Guidelines §15355[b]). By requiring an evaluation of cumulative impacts, CEQA attempts to ensure that large-scale environmental impacts will not be ignored.

Consistent with CEQA Guidelines §15130(a), the discussion of cumulative impacts in this EIR focuses on significant and potentially significant cumulative impacts. According to CEQA Guidelines §15130(b), “the discussion of cumulative impacts shall reflect the severity of the impacts and their likelihood of occurrence, but the discussion need not provide as great detail as provided for the effects attributable to the project alone. The discussion should be guided by the standards of practicality and reasonableness, and should focus on the cumulative impact to which the identified other project contribute rather than the attributes of other projects which do not contribute to the cumulative impact.”

The following elements are necessary to an adequate discussion of cumulative impacts (CEQA Guidelines §15130[b]):

- Either: (A) a list of past, present, and reasonably anticipated future projects producing related or cumulative impacts, including those projects outside the control of the agency; or (B) a summary of projections contained in an adopted general plan or related planning document that is designed to evaluate regional or area wide conditions. Any such planning document shall be referenced and made available to the public at a location specified by the lead agency.
- A summary of the expected environmental effects to be produced by those projects with specific reference to additional information stating where that information is available.
- A reasonable analysis of the cumulative impacts of the relevant projects. An EIR shall examine reasonable options for mitigating or avoiding any significant cumulative effects of the proposed projects.

In accordance with **Section 15130(b)(1)(B)**, the analysis of the cumulative effects of the Draft General Plan relies on the regional growth projections provided by the San Diego Association of Governments’ (SANDAG) *2030 Regional Growth Forecast Update* (Regional Growth Forecast). The Regional Growth Forecast provides estimates and forecasts of employment, population, and

housing for the period between 2004 and 2030. The Regional Growth Forecast is available on file at the City of San Diego and available for review at the City Planning & Community Investment Department.

According to the forecast, the population of the City of San Diego is projected to increase by 361,110 persons or approximately 28 percent between 2004 and 2030 to approximately 1,656,257 persons. The population of San Diego County (i.e., the unincorporated areas of the county and all of the incorporated cities) is projected to increase by 971,739 persons or approximately 32 percent between 2004 and 2030 to 3,984,753 persons. The number of housing units is projected to increase by approximately 24 percent within the City and 26 percent within the county during the 2004-2030 period.

Table 5.1-1
Projections for the City of San Diego and San Diego County, 2004 and 2030

	Total Population		Total Housing Units	
	2004	2030	2004	2030
City of San Diego	1,295,147	1,656,257	490,266	610,249
San Diego County	3,013,014	3,984,753	1,095,077	1,383,803

Source: SANDAG 2030 Regional Growth Forecast Update, September 2006.

The following is a discussion of the cumulative impacts of the Draft General Plan. Cumulative impacts are analyzed in light of the significance thresholds presented in **Section 3.1** through **3.17** of this Program EIR, with the exception of global warming impacts. Implementation of the Mitigation Framework identified in **Sections 3.1** through **3.17** would reduce the incremental contribution of the Draft General Plan to cumulative impacts to the extent feasible. Global warming impacts and the associated mitigation framework are provided in **Section 5.2**. The mitigation framework for global warming impacts is provided in **Section 5.2** and not in the Environmental Analysis of **Section 3.0** because the global warming impacts that are anticipated to occur during implementation of the Draft General Plan are cumulative in nature.

Agricultural Resources

The substantial population growth and development within San Diego County since the 1950s involved the conversion of agricultural to urban uses that still continues today. During the period between 2002 and 2004, the latest data available, the amount of land within San Diego County designated as agricultural lands decreased by 16,005 acres. As San Diego County develops in response to projected future population growth, existing agricultural lands—including Prime Farmland, Unique Farmland, Farmland of Statewide Importance, lands under Williamson Act contract, and land zoned for agricultural use—would continue to be converted to urban or other non-agricultural land uses. In addition, the productivity of some agricultural lands would likely be impaired as future urban development encroaches upon existing agricultural lands. Under existing adopted plans as well as the Draft General Plan, less than two percent of the City's land area is within an agricultural land use designation. The City has existing programs to protect the

City's best remaining agricultural soils through lease agreements, such as in the San Pasqual Valley, where agriculture comprises approximately 30 percent of the land use. The Draft General Plan (p. CE-39) calls for continued "retention of productive agricultural lands," "reduction of land use conflicts between agricultural and other land uses," and "retention of the rural agricultural character of the river valleys." While the General Plan has specific goals and policies to protect agricultural land, if future discretionary projects result in the conversion of a substantial amount of existing agricultural land to a non-agricultural use or the impairment of the productivity of existing agricultural land as a result of encroaching urban development, an incremental agricultural resources impact would occur.

The City's process for the evaluation of discretionary projects includes environmental review and documentation pursuant to CEQA, as well as analysis of those projects for consistency with the goals, policies and recommendations of the General Plan. In general, implementation of the above policies and compliance with federal, state, and local regulations would preclude significant incremental agricultural resources impacts. However, for some projects it is possible that adherence to regulations may not adequately avoid or reduce incremental impacts, and such projects would require additional measures. For each future discretionary project requiring mitigation (i.e., measures that go beyond what is required by existing regulations), site-specific measures such as the general measures listed within the Mitigation Framework of **Section 3.1.4** will be identified to reduce significant project-level incremental impacts to less than significant, or the project's incremental impacts may remain significant and unavoidable where no feasible mitigation exists. However, the degree of future impacts and applicability, feasibility, and success of future mitigation measures cannot be adequately known for each specific future project at this program level of analysis. Therefore, potential incremental agricultural resources impacts cannot be precluded, and when viewed in connection with the direct and indirect loss of these resources to urbanization and the impairment of the productivity of existing agricultural lands elsewhere in the County, are considered cumulatively significant and unavoidable.

Air Quality

The San Diego Air Basin (SDAB) is currently designated as a nonattainment area with respect to state and federal standards for ozone, and state standards for PM₁₀ and PM_{2.5}. Future development associated with the projected population growth for San Diego County would generate increased air pollutant emissions associated with construction activities, transportation, and stationary sources. As described in **Section 3.2**, construction activities that are needed to support population growth that is anticipated to occur during the course of implementation of the Draft General Plan could result in substantial emissions of PM₁₀ and PM_{2.5}. In addition, the high propensity for infill and redevelopment activities to occur in accordance with the Draft General Plan could increase the volume of traffic flow at some intersections, which could potentially increase the number of vehicles that are idling at roadways intersections releasing emissions and causing localized concentrations of carbon monoxide or CO hot spots that can harm sensitive receptors near the affected intersection. Since CO hot spots involve concentration of CO and would not increase the total amount of CO in the SDAB, CO hot spots would not have greater cumulative impacts when considered together.

The City's process for the evaluation of discretionary projects includes environmental review and documentation pursuant to CEQA, as well as analysis of those projects for consistency with the goals, policies and recommendations of the General Plan. In general, implementation of the above policies and compliance with federal, state, and local regulations would preclude incremental air quality impacts. However, for some projects it is possible that adherence to regulations may not adequately avoid or reduce incremental impacts, and such projects would require additional measures.

For each future discretionary project requiring mitigation (i.e., measures that go beyond what is required by existing regulations), site-specific measures such as the general measures listed within the Mitigation Framework of **Section 3.2.4** will be identified to reduce significant project-level incremental PM₁₀ and PM_{2.5} emissions to less than significant, or the project's incremental impacts may remain significant and unavoidable where no feasible mitigation exists. However, the degree of future impacts and applicability, feasibility, and success of future mitigation measures cannot be adequately known for each specific future project at this program level of analysis. Therefore, incremental PM₁₀ and PM_{2.5} emissions cannot be precluded, and when viewed in connection with PM₁₀ and PM_{2.5} emissions from construction activities elsewhere in the county, are considered cumulatively significant and unavoidable.

Biological Resources

The Multiple Species Conservation Program (MSCP), Multiple Habitat Conservation Program (MHCP), and the Multiple Habitat Conservation and Open Space Program collectively contribute to the conservation of vegetation communities and species in San Diego County. However, as San Diego County develops based on projected future population growth and housing units, biological resources not adequately protected by an adopted species or habitat conservation program or other regulations may be adversely affected. While the majority of growth associated with future implementation of the Draft General Plan is expected to occur through infill and redevelopment future development could occur on or adjacent to undeveloped land, which may result in impacts to biological resources, including native habitat, wetlands, wildlife movement, and sensitive species.

The City's process for the evaluation of discretionary projects includes environmental review and documentation pursuant to CEQA, as well as analysis of those projects for consistency with the goals, policies and recommendations of the General Plan. In general, implementation of the above policies and compliance with federal, state, and local regulations would preclude incremental biological resources impacts. However, for some projects it is possible that adherence to regulations may not adequately avoid or reduce incremental impacts, and such projects would require additional measures.

For each future discretionary project requiring mitigation (i.e., measures that go beyond what is required by existing regulations), site-specific measures such as the general measures listed within the Mitigation Framework of **Section 3.3.4** will be identified to reduce significant project-level biological resources impacts to less than significant, or the project's incremental impacts may remain significant and unavoidable where no feasible mitigation exists. However, the degree of future impacts and applicability, feasibility, and success of future mitigation measures

cannot be adequately known for each specific future project at this program level of analysis. Therefore, incremental biological resources impacts cannot be precluded, and when viewed in connection with regional impacts to unprotected species, habitats and other resources, are considered cumulatively significant and unavoidable.

Geologic Conditions

Projected population growth in the county and in the plan area would increase the number of people potentially exposed to seismic and geologic hazards. Although new development is required to meet certain safety design features that reduce potential impacts associated with seismic and geologic hazards to less than significant, a portion of the increased population in the county and the plan area would be housed in older structures inadequately designed to protect public health from seismic and geologic hazards. Erosion rates would be accelerated by earthwork for new construction. Such impacts are site-specific and do not compound or increase in combination with projected development elsewhere in the county. Nevertheless, development that is anticipated to occur during implementation of the Draft General Plan could result in an incremental increase in the number of people exposed to seismic and geologic hazards.

The City's process for the evaluation of discretionary projects includes environmental review and documentation pursuant to CEQA, as well as analysis of those projects for consistency with the goals, policies and recommendations of the General Plan and the applicable community plans. In general, implementation of the above policies and compliance with federal, state, and local regulations would preclude incremental exposure to seismic and geologic hazards. However, for some projects it is possible that adherence to regulations may not adequately avoid or reduce incremental impacts, and such projects would require additional measures.

For each future discretionary project requiring mitigation (i.e., measures that go beyond what is required by existing regulations), site-specific measures such as the general measures listed within the Mitigation Framework of **Section 3.4.4** will be identified to reduce significant project-level seismic and geologic hazards to less than significant, or the project's incremental impacts may remain significant and unavoidable where no feasible mitigation exists. However, the degree of future impacts and applicability, feasibility, and success of future mitigation measures cannot be adequately known for each specific future project at this program level of analysis. Therefore, an incremental increase in the number of people exposed to seismic and geologic hazards cannot be precluded, and when viewed in connection with the regional exposure of people to such hazards, is considered cumulatively significant and unavoidable.

Health and Safety

Projected population growth in the county and in the plan area would increase the number of people potentially exposed to health and safety impacts related to hazardous materials transportation safety, hazardous materials in industrial areas or former agricultural lands, physical interference with emergency response or emergency evacuation plans, seiche, tsunami, mudflow, urban and wildland fires, aircraft operations accidents, and flooding. Compliance with existing local, state, and federal regulations pertaining to hazardous materials transportation safety, hazardous materials in industrial areas or former agricultural lands, and with emergency

response and emergency evacuation plans would ensure that cumulative impacts to health and safety related to these issues would be less than significant. Current regulations, development code, and emergency management plans would ensure that the potential impact of seiche, tsunami or mudflows on people and structures within the plan area would not be substantial, and cumulative impacts will be less than significant. The continual review and updating of these documents and regulations would further reduce potential cumulative impacts.

However, due to the county's climate, topography, and native vegetation, some new and existing development would be subject to wildland fires. In addition, despite conformance with adopted Airport Land Use Compatibility Plans, projected population growth within the county and the plan area would increase the population of people living near airports and within aircraft flight paths and, therefore, subject to risks associated with aircraft operations accidents. Cumulative population growth within the county and the plan area would also increase the amount of people within flood prone areas, such as the Mission Valley, La Jolla, and Tijuana River Valley areas. Therefore, population growth occurring during implementation of the Draft General Plan may result in an incremental increase in the number of people exposed to hazards related to urban and wildland fires, aircraft operations accidents, and flooding.

The City's process for the evaluation of discretionary projects includes environmental review and documentation pursuant to CEQA, as well as analysis of those projects for consistency with the goals, policies and recommendations of the General Plan. In general, implementation of the above policies and compliance with federal, state, and local regulations would preclude incremental exposure to hazards related to urban and wildland fires, aircraft operations accidents, and flooding. However, for some projects it is possible that adherence to regulations may not adequately avoid or reduce incremental urban and wildland fire impacts, and such projects would require additional measures.

For each future discretionary project requiring mitigation (i.e., measures that go beyond what is required by existing regulations), site-specific measures such as the general measures listed within the Mitigation Framework of **Section 3.5.4** will be identified to reduce significant project-level ~~fire~~, aircraft operations and flooding hazards to less than significant, ~~or~~ however the project's incremental impacts may remain significant and unavoidable where no feasible mitigation exists. ~~However,~~ The degree of future impacts and applicability, feasibility, and success of future mitigation measures cannot be adequately known for each specific future project at this program level of analysis. Therefore, an incremental increase in the number of people exposed to hazards related to urban and wildland fires, ~~aircraft operations accidents, and flooding~~ cannot be precluded, and when viewed in connection with the regional exposure of people to such hazards, is considered cumulatively significant and unavoidable.

Historic Resources

The demolition or substantial alteration of a resource listed on, or formally determined eligible for, the National Register or California Register, including contributors to National Register or California Register Historic Districts; or listed on the San Diego Register, including contributors to San Diego Register Historic Districts; or that meet the CEQA criteria for historical resources would represent a significant direct impact to historical resources. Additionally, grading,

excavation and other ground disturbing activities associated with development projects that affect significant archaeological sites or traditional cultural properties would represent a significant direct impact to historical resources.

Future development associated with projected county population growth would involve ground disturbing activities such as grading or excavation with the potential to result in impacts to historic and/or archaeological resources or prehistoric human remains. In addition, development within the county could involve impacts associated with the substantial alteration, relocation, or demolition of historic buildings, structures, objects, landscapes, and sites. Archaeological resources and prehistoric human remains may be difficult to detect prior to construction activities, as they are generally located below the ground surface. The potential to affect important archaeological sites and prehistoric human remains exists if a development activity requires even minimal grading and/or excavation. The likelihood of encountering archaeological resources is greatest on sites that have been minimally excavated in the past (e.g., undeveloped parcels, vacant lots and lots containing surface parking; undeveloped areas around historic buildings; under buildings with post, pier, slab, or shallow wall foundations without basements; etc.).

Development that is expected to occur through the implementation of the Draft General Plan and throughout the county could involve ground disturbance activities and substantial alteration, relocation, or demolition of historic buildings, structures, objects, landscapes, and sites that would significantly impact historic and archaeological resources and prehistoric human remains.

The City's process for the evaluation of discretionary projects includes environmental review and documentation pursuant to CEQA, as well as analysis of those projects for consistency with the goals, policies and recommendations of the General Plan. In general, implementation of the above policies and compliance with federal, state, and local regulations would preclude impacts to historic and archaeological resources and prehistoric human remains. However, for some projects it is possible that adherence to regulations may not adequately avoid or reduce incremental impacts, and such projects would require additional measures.

For each future discretionary project requiring mitigation (i.e., measures that go beyond what is required by existing regulations), site-specific measures such as the general measures listed within the Mitigation Framework of **Section 3.6.4** will be identified to reduce significant project-level impacts to historic and archaeological resources and prehistoric human remains to less than significant, or the project's incremental impacts may remain significant and unavoidable where no feasible mitigation exists. However, the degree of future impacts and applicability, feasibility, and success of future mitigation measures cannot be adequately known for each specific future project at this program level of analysis. Therefore, incremental impacts related to historic and archaeological resources and prehistoric human remains, when viewed in connection with historic resources impacts elsewhere in the county, are considered cumulatively significant and unavoidable.

Hydrology

Future development associated with projected population growth in the county will result in

increased impervious surfaces within the county's watersheds, which will result in hydrologic impacts associated with absorption rates, drainage patterns, or rates of surface runoff. The construction of new development as well as some redevelopment activities, could result in the conversion of natural vegetated pervious groundcover to impervious surfaces such as paved highways, streets, rooftops, and parking lots. Unlike natural vegetated soils, pavement and concrete cannot absorb rainwater. The introduction of new or expanded impermeable surface areas can potentially affect absorption rates, drainage patterns, or the rate of surface runoff. The infill and redevelopment that would be likely to occur under the Draft General Plan could have impacts on existing absorption rates, drainage patterns, or the rate of surface runoff, and would also result in hydrological impacts.

The City's process for the evaluation of discretionary projects includes environmental review and documentation pursuant to CEQA, as well as analysis of those projects for consistency with the goals, policies and recommendations of the General Plan. In general, implementation of the above policies and compliance with federal, state, and local regulations would preclude hydrological impacts. However, for some projects it is possible that adherence to regulations may not adequately avoid or reduce incremental impacts, and such projects would require additional measures.

For each future discretionary project requiring mitigation (i.e., measures that go beyond what is required by existing regulations), site-specific measures such as the general measures listed within the Mitigation Framework of **Section 3.7.4** will be identified to reduce significant project-level hydrological impacts to less than significant, or the project's incremental impacts may remain significant and unavoidable where no feasible mitigation exists. However, the degree of future impacts and applicability, feasibility, and success of future mitigation measures cannot be adequately known for each specific future project at this program level of analysis. Therefore, incremental hydrological impacts related to absorption rates, drainage patterns, and/or rates of surface runoff, when viewed in connection with hydrological impacts elsewhere in the county, are considered cumulatively significant and unavoidable.

Land Use

Some physical changes to the environment associated with land use impacts are site-specific in nature, as would be the case for incompatibilities with Airport Land Use Plans and physically divided communities. In addition, physical changes to the environment associated with conflicts with the local environmental goals of the adopted community plans, land use designations or any other applicable land use plans of the City would be specific to the Draft General Plan (not cumulative) and are addressed in **Section 3.8**.

Cumulative development within the county would not lead to combined physical environmental effects associated with land use impacts that result in a greater cumulative impact than would occur for each specific location of a potential land use impact, with the potential exceptions of ~~conflicts with adopted regional, state, and federal environmental plans, policies and regulations~~ and impacts related to land use incompatibilities. Protective measures within adopted regional, state, and federal environmental plans, including applicable habitat conservation plans and compliance with the mandatory policies and regulations of state or federal agencies would

ensure that physical changes to the environment associated with the incremental effect of the Draft General Plan on adopted regional, state, and federal environmental plans, policies and regulations is not cumulatively ~~considerable~~ significant when viewed in connection with physical changes to the environment associated future regional development in surrounding jurisdictions.

However, a substantial portion of future development within both the plan area and elsewhere in the county is likely to consist of infill and redevelopment, which typically involves increased exposure of sensitive receptors to incompatible land uses such as restaurants, bars, and night clubs, industrial uses, traffic noise, and other adverse physical impacts.

The City's process for the evaluation of discretionary projects includes environmental review and documentation pursuant to CEQA, as well as analysis of those projects for consistency with the goals, policies and recommendations of the General Plan. In general, implementation of the above policies and compliance with federal, state, and local regulations would preclude adverse physical changes to the environment associated with land use impacts. However, for some projects it is possible that adherence to regulations may not adequately avoid or reduce incremental impacts, and such projects would require additional measures.

For each future discretionary project requiring mitigation (i.e., measures that go beyond what is required by existing regulations), site-specific measures such as the general measures listed within the Mitigation Framework of **Section 3.8.4** will be identified to reduce significant project-level adverse physical changes to the environment associated with land use impacts to less than significant, or the project's incremental impacts may remain significant and unavoidable where no feasible mitigation exists. However, the degree of future impacts and applicability, feasibility, and success of future mitigation measures cannot be adequately known for each specific future project at this program level of analysis. Therefore, incremental adverse physical changes to the environment associated with land use impacts, when viewed in connection with such adverse physical changes associated with land use impacts elsewhere in the county, are considered cumulatively significant and unavoidable.

Mineral Resources

The Surface Mining and Reclamation Act of 1975 (SMARA) requires local jurisdictions to plan for the beneficial management of valuable mineral resources (a more detailed discussion of SMARA is provided in **Section 3.9**). Although SMARA protects lands containing valuable mineral resources from urban development, development associated with future population growth in San Diego County could result in adjacent incompatible land uses that impact the extraction of mineral resources of value to the county and/or state. In addition, a balancing of implementation of Draft General Plan goals and policies addressing habitat and open space preservation, and mineral extraction may lead to the loss of access to significant mineral resources.

The City's process for the evaluation of discretionary projects includes environmental review and documentation pursuant to CEQA, as well as analysis of those projects for consistency with the goals, policies and recommendations of the General Plan. In general, implementation of the

above policies and compliance with federal, state, and local regulations would preclude mineral resources impacts. However, for some projects it is possible that adherence to regulations may not adequately avoid or reduce incremental impacts, and such projects would require additional measures.

For each future discretionary project requiring mitigation (i.e., measures that go beyond what is required by existing regulations), site-specific measures such as the general measures listed within the Mitigation Framework of **Section 3.9.4** will be identified to reduce significant project-level mineral resources impacts to less than significant, or the project's incremental impacts may remain significant and unavoidable where no feasible mitigation exists. However, the degree of future impacts and applicability, feasibility, and success of future mitigation measures cannot be adequately known for each specific future project at this program level of analysis. Therefore, incremental mineral resources impacts, when viewed in connection with incompatible land uses that impact the extraction of valuable mineral resources elsewhere in the county, are considered cumulatively significant and unavoidable.

Noise

As the county develops in response to projected population growth, future residential, commercial, industrial, transportation, and public facilities projects would not only result in short-term construction-related noise impacts, but the operation of these projects would cumulatively increase ambient noise levels in the county. All jurisdictions have existing ordinances that dictate periods of construction to avoid significant impacts. Cumulative noise impacts would generally be associated with improvements to major regional transportation corridors and stationary sources such as industrial land uses. Sensitive receptors within the noise impact zone of major transportation corridors and significant stationary sources of noise could be exposed to noise levels in excess of applicable standards as a result.

Improvements to major regional transportation corridors that are anticipated to occur during implementation of the Draft General Plan could increase the number of trucks and buses operating on regional freeways and arterials and the number of trains operating on regional rail lines, which would result in increased ambient noise levels along these transportation corridors. In addition, improvements in major transportation corridors could increase the number of trucks, buses, and trains within such corridors, which generate more noise per vehicle than automobiles. Furthermore, there is a high propensity for infill and redevelopment near existing and planned transit facilities under the Draft General Plan, which could decrease vehicular congestion and allow vehicular traffic on freeways and major arterials to move faster, potentially increasing the noise produced by vehicular traffic in certain corridors.

The addition of new stationary sources that are anticipated to occur during implementation of the Draft General Plan could, when viewed in connection with new stationary sources elsewhere in the county, cumulatively expose sensitive receptors to elevated ambient noise levels.

The City's process for the evaluation of discretionary projects includes environmental review and documentation pursuant to CEQA, as well as analysis of those projects for consistency with the goals, policies and recommendations of the General Plan. In general, implementation of the

above policies and compliance with federal, state, and local regulations would preclude impacts related to the incremental exposure of sensitive receptors to increased ambient noise levels along major transportation corridors and within the vicinity of new stationary sources. However, for some projects it is possible that adherence to regulations may not adequately avoid or reduce incremental impacts, and such projects would require additional measures.

For each future discretionary project requiring mitigation (i.e., measures that go beyond what is required by existing regulations), site-specific measures such as the general measures listed within the Mitigation Framework of **Section 3.10.4** will be identified to reduce significant project-level noise impacts to less than significant, or the project's incremental impacts may remain significant and unavoidable where no feasible mitigation exists. However, the degree of future impacts and applicability, feasibility, and success of future mitigation measures cannot be adequately known for each specific future project at this program level of analysis. Therefore, the incremental exposure of sensitive receptors to increased ambient noise levels along major transportation corridors and within the vicinity of new stationary sources, when viewed in connection with the increased number of trucks, buses, and trains along these corridors and new stationary sources associated with development elsewhere in the county, are considered cumulatively significant and unavoidable.

Paleontological Resources

Paleontological resources are a site-specific resource within the planning area of the Draft General Plan, although there is potential for the cumulative loss of such resources throughout the county. As the county continues to develop in response to projected population growth, mass grading, underground parking areas, roadway construction and other activities associated with future development may result in the loss of unique paleontological resources or geologic formations with medium to high fossil bearing potential. Development allowed pursuant to the Draft General Plan would likely involve mass grading, underground parking areas, roadway construction and other activities associated with infill and redevelopment in existing areas and new urban development on previously undeveloped areas, some of which may consist of unique paleontological resources or medium to high fossil bearing potential.

The City's process for the evaluation of discretionary projects includes environmental review and documentation pursuant to CEQA, as well as analysis of those projects for consistency with the goals, policies and recommendations of the General Plan. In general, implementation of the above policies and compliance with federal, state, and local regulations would preclude incremental paleontological resources impacts. However, for some projects it is possible that adherence to regulations may not adequately avoid or reduce incremental impacts, and such projects would require additional measures.

For each future discretionary project requiring mitigation (i.e., measures that go beyond what is required by existing regulations), site-specific measures such as the general measures listed within the Mitigation Framework of **Section 3.11.4** will be identified to reduce significant project-level incremental paleontological resources impacts to less than significant, or the project's incremental impacts may remain significant and unavoidable where no feasible mitigation exists. However, the degree of future impacts and applicability, feasibility, and

success of future mitigation measures cannot be adequately known for each specific future project at this program level of analysis. Therefore, incremental paleontological resources impacts, when viewed in connection with the mass grading, underground parking, roadway construction and other activities elsewhere in the county, are considered cumulatively significant and unavoidable.

Population and Housing

Population and housing displacement are regional concerns. Due to the limited amount of developable land within San Diego County relative to the amount of projected population growth, a sizeable portion of future development within the county could consist of infill and redevelopment. Infill and redevelopment activities within existing developed areas of the county could result in the displacement of substantial numbers of people or housing, necessitating the construction of replacement housing. According to **Section 3.12**, the infill and redevelopment that would likely occur under the Draft General Plan could result in the displacement of substantial numbers of people or housing, necessitating the construction of replacement housing. Infill and redevelopment that occurs in accordance with the Draft General Plan is anticipated to increase the housing stock, as it would likely be in the form of mixed-use village development on existing sites that predominantly consist of commercial uses. However, existing housing may be redeveloped as a part of village areas, and the new housing may be more expensive than the housing it replaces. This process could lead to the displacement of substantial numbers of people or housing, necessitating the construction of replacement housing. The displacement of people is considered a social and economic impact, but not a physical CEQA impact. The construction of replacement housing has the potential to result in physical environmental impacts.

The City's process for the evaluation of discretionary projects includes environmental review and documentation pursuant to CEQA, as well as analysis of those projects for consistency with the goals, policies and recommendations of the General Plan. In general, implementation of the above policies and compliance with federal, state, and local regulations would preclude incremental impacts related to the incremental displacement of substantial numbers of people or housing necessitating the construction of new housing elsewhere. However, for some projects it is possible that adherence to regulations may not adequately avoid or reduce incremental impacts, and such projects would require additional measures.

For each future discretionary project requiring mitigation (i.e., measures that go beyond what is required by existing regulations), site-specific measures such as the general measures listed within the Mitigation Framework of **Section 3.12.4** will be identified to reduce significant project-level incremental impacts related to the incremental displacement of substantial numbers of people or housing necessitating the construction of new housing elsewhere to less than significant, or the project's incremental impacts may remain significant and unavoidable where no feasible mitigation exists. However, the degree of future impacts and applicability, feasibility, and success of future mitigation measures cannot be adequately known for each specific future project at this program level of analysis. Therefore, the incremental displacement of substantial numbers of people or housing necessitating the construction of new housing elsewhere, when viewed in connection with displacement caused by infill and redevelopment elsewhere in the county, is considered cumulatively significant and unavoidable.

Public Services and Facilities

Future development in the county would require new or improved public services and facilities infrastructure due to the increased demand for police, fire, schools, libraries, parks and other services associated with development. The construction of new or improved public services and facilities infrastructure could result in physical impacts to the environment. Many agencies such as police and fire departments are party to agency sharing agreements in which agencies from one jurisdiction provide a public service to another jurisdiction under certain circumstances. In addition, some smaller school districts within the City serve students in both the outlying northern, eastern, and southern areas of the plan area and in other jurisdictions in the county. Therefore, impacts associated with the need for new or physically altered public services and facilities are cumulative in nature.

The Draft General Plan calls for future growth to be focused into mixed-use activity centers that are linked to the regional transit system. Implementation of the Plan would result in infill and redevelopment occurring in selected developed areas, which would be identified through the community plan update/amendment process. The Draft General Plan would also guide the development of remaining developable vacant lands. The City's existing built areas are currently served by public services and facilities infrastructure. However, some of the City's existing built areas have existing infrastructure deficiencies and would require capacity improvements to serve the additional population. Therefore, it is anticipated that new or improved public services and facilities infrastructure would be required to meet the needs of the City's future growth occurring through infill and redevelopment as well as on remaining vacant and developable lands.

The City's process for the evaluation of discretionary projects includes environmental review and documentation pursuant to CEQA, as well as analysis of those projects for consistency with the goals, policies and recommendations of the General Plan. In general, implementation of the above policies and compliance with federal, state, and local regulations would preclude incremental impacts associated with new construction of, or improvements to, public services and facilities infrastructure. However, for some projects it is possible that adherence to regulations may not adequately avoid or reduce incremental impacts, and such projects would require additional measures.

For each future discretionary project requiring mitigation (i.e., measures that go beyond what is required by existing regulations), site-specific measures such as the general measures listed within the Mitigation Framework of **Section 3.13.4** will be identified to reduce significant project-level incremental impacts associated with new construction of, or improvements to, public services and facilities infrastructure to less than significant, or the project's incremental impacts may remain significant and unavoidable where no feasible mitigation exists. However, the degree of future impacts and applicability, feasibility, and success of future mitigation measures cannot be adequately known for each specific future project at this program level of analysis. Therefore, incremental impacts associated with the construction of future public services and facilities infrastructure improvements, when viewed in connection with the increased regional demand for and construction of such improvements, are considered cumulatively significant and unavoidable.

Public Utilities

Future county development will require new or improved public utilities infrastructure due to the increased demand for water, wastewater, energy, solid waste, stormwater, and communications services associated with development. As discussed in **Section 3.14** of this Program EIR, the San Diego County Water Authority's 2005 Urban Water Management Plan (Water Plan) identifies a diverse mix of water resources projected to be developed through 2030 to ensure long-term water supply reliability for the county, including the identification of alternative water supply sources to alleviate the risk of unforeseen water shortages (**Section 3.14** includes discussion of the types of alternative water sources, the amount of water expected from these sources, and the potential environmental impacts of implementing the alternatives). Population growth that is anticipated to occur in accordance with Draft General Plan implementation is projected to have a total water demand of 301,600 AFY in 2030. The projected demand is anticipated to be met based on the 2005 Water Plan. If unforeseen water shortages occur and alternative water sources are not available, development that could significantly impact water supply either individually or cumulatively shall only receive entitlement from the City if it is conditioned with all reasonable mitigation to avoid, minimize, or offset the impact. Therefore, the incremental increase in demand for water associated population growth that occurs in accordance with Draft General Plan implementation is considered a less than significant cumulative impact on regional water supply at this program level of analysis.

Implementation of the Draft General Plan addresses infill and redevelopment, as well as the development of remaining developable vacant lands, as discussed above. The City's existing built areas are currently served by water, solid waste, storm water infrastructure and public utilities infrastructure. However, some of the City's existing built areas have existing infrastructure deficiencies and would require capacity improvements to serve the additional population. Additionally, the General Plan includes policies that would reduce demand for energy, such as focusing growth into mixed use, compact, walkable communities that are linked to the region's existing and planned transit system and increasing the amount of energy-efficient, green buildings in the City. However, since there are no specific development projects, community plan updates, or other discretionary actions proposed at this time, the demand for energy resulting from implementation of such projects and actions could be considered excessive. ThereforeDue to existing infrastructure deficiencies in existing built areas of the City and the potential for excessive energy consumption, it is anticipated that new or improved public utilities infrastructure would be required to meet the needs of the City's future growth occurring through infill and redevelopment as well as on remaining vacant and developable lands.

The City's process for the evaluation of discretionary projects includes environmental review and documentation pursuant to CEQA, as well as analysis of those projects for consistency with the goals, policies and recommendations of the General Plan. In general, implementation of the above policies and compliance with federal, state, and local regulations would preclude incremental impacts associated with new construction of, or improvements to, public utilities infrastructure.

However, the degree of future impacts and applicability, feasibility, and success of future mitigation measures cannot be adequately known for each specific future project at this program level of analysis. Therefore, incremental impacts associated with potentially excessive energy consumption and the construction of future public utilities infrastructure improvements, when viewed in connection with the increased regional demand for energy and such improvements, maybe considered cumulatively significant and unavoidable.

Traffic

Project-level impacts related to excessive parking demand and decreased multimodal trips in the City's transportation system are specific to the Draft General Plan and not a cumulative concern. However, project-level impacts associated with an increased number of roadway miles at Level of Service E or F on the planned transportation network could result in greater cumulative impacts when viewed in connection with future development elsewhere in San Diego County. The SANDAG Transportation Model forecasts that daily vehicle miles traveled at LOS E or F will decrease by the Year 2030. However, due to uncertainties associated with the long-range implementation of the MOBILITY 2030 Regional Transportation Plan (RTP) and potential changes that could occur during the major update of the RTP that is currently underway, future regional development could increase the number of roadway miles at LOS E or F on the planned transportation network. Impacts to roadway LOS within the Plan area could occur because (1) implementation of the Draft General Plan could result in community plan updates that alter planned land uses and transportation or in development projects that require new or altered transportation facilities and (2) the aforementioned uncertainties associated with the RTP.

The City's process for the evaluation of discretionary projects includes environmental review and documentation pursuant to CEQA, as well as analysis of those projects for consistency with the goals, policies and recommendations of the General Plan. In general, implementation of the above policies and compliance with federal, state, and local regulations would preclude incremental impacts associated with an increase in roadway miles at LOS E or F on the planned transportation network. However, for some projects it is possible that adherence to regulations may not adequately avoid or reduce incremental impacts, and such projects would require additional measures.

For each future discretionary project requiring mitigation (i.e., measures that go beyond what is required by existing regulations), site-specific measures such as the general measures listed within the Mitigation Framework of **Section 3.15.4** will be identified to reduce significant project-level incremental impacts associated with an increase in roadway miles at LOS E or F on the planned transportation network to less than significant, or the project's incremental impacts may remain significant and unavoidable where no feasible mitigation exists. However, the degree of future impacts and applicability, feasibility, and success of future mitigation measures cannot be adequately known for each specific future project at this program level of analysis. Therefore, incremental impacts associated with an increase in roadway miles at LOS E or F on the planned transportation network, when viewed in connection with regional traffic LOS impacts, is considered cumulatively significant and unavoidable.

Visual Effects and Neighborhood Character

In spite of Draft General Plan policies designed to mitigate the visual impacts of future growth within the plan area, the infill and redevelopment that would likely occur under the Draft General Plan may result in significant project-level impacts associated with visual resources and neighborhood character. Project-level impacts related to the substantial blocking of public views from designated open space areas, scenic highways or to any significant visual landmarks or scenic vistas (e.g., mountains, bays, rivers, and ocean), substantial changes in topography or to ground surface relief features, and the negative and substantial alteration of the existing character of the plan area are generally site-specific or specific to the Draft General Plan area and not a cumulative concern. However, since the Draft General Plan area constitutes a large portion of San Diego County, project-level impacts related to substantial blocking of public views from designated open space areas, scenic highways or to any significant visual landmarks or scenic vistas (e.g., mountains, bays, rivers, and ocean), substantial changes in topography or to ground surface relief features, and negative and substantial alteration of the existing character of the plan area, would constitute cumulative visual impacts to San Diego County.

The City's process for the evaluation of discretionary projects includes environmental review and documentation pursuant to CEQA, as well as analysis of those projects for consistency with the goals, policies and recommendations of the General Plan. In general, implementation of the above policies and compliance with federal, state, and local regulations would preclude incremental visual impacts. However, for some projects it is possible that adherence to regulations may not adequately avoid or reduce incremental impacts, and such projects would require additional measures.

For each future discretionary project requiring mitigation (i.e., measures that go beyond what is required by existing regulations), site-specific measures such as the general measures listed within the Mitigation Framework of **Section 3.16.4** will be identified to reduce significant project-level incremental visual impacts to less than significant, or the project's incremental impacts may remain significant and unavoidable where no feasible mitigation exists. However, the degree of future impacts and applicability, feasibility, and success of future mitigation measures cannot be adequately known for each specific future project at this program level of analysis. Therefore, since the Draft General Plan area constitutes a large portion of San Diego county, incremental impacts related to substantial blocking of public views from designated open space areas, scenic highways or to any significant visual landmarks or scenic vistas (e.g., mountains, bays, rivers, and ocean), substantial changes in topography or to ground surface relief features, and negative and substantial alteration of the existing character of the plan area are considered cumulatively significant and unavoidable.

Water Quality

The majority of water bodies within San Diego County are part of hydrologic systems located in multiple jurisdictions; some watersheds are located within both the Draft General Plan area and other jurisdictions. As a result, water pollution produced by urban development in one jurisdiction can result in water quality impacts that affect other jurisdictions or the entire county. Thus, all jurisdictions within the county work cooperatively to reduce regional water quality

impacts. This cooperation is established under the NPDES Municipal Permit, which requires co-permittees to collaborate on the development of a Watershed Urban Runoff Management Plan (WURMP) for each watershed. The WURMP documents address high priority stormwater quality issues found within the multiple regional watersheds. Compliance of the WURMP documents by the City of San Diego and other jurisdictions within the county's watersheds would help reduce both individual and cumulative impacts to water quality. Cumulative impacts would occur when the water quality impacts of two or more jurisdictions which, when considered together, are considerable or which, compound or increase other effects. As the county develops in response to future population growth, water quality impacts to regional watersheds, some of which are located within both the Draft General Plan area and other jurisdictions, would occur. Future development under the Draft General Plan, which would likely include infill and redevelopment as well new development on remaining vacant and developable lands, could generate pollution that adversely affects water quality.

The City's process for the evaluation of discretionary projects includes environmental review and documentation pursuant to CEQA, as well as analysis of those projects for consistency with the goals, policies and recommendations of the General Plan. In general, implementation of the above policies and compliance with federal, state, and local regulations would preclude incremental water quality impacts. However, for some projects it is possible that adherence to regulations may not adequately avoid or reduce incremental impacts, and such projects would require additional measures.

However, the degree of future impacts and applicability, feasibility, and success of future mitigation measures cannot be adequately known for each specific future project at this program level of analysis. Therefore, incremental water quality impacts, when viewed in connection with water quality impacts from development in other jurisdictions of the county, may be considered cumulatively significant and unavoidable.

Conclusion

When the Draft General Plan is considered in combination with regional population growth projections for San Diego County, cumulatively significant and unavoidable impacts would occur in all of the environmental impact issue areas.

5.2 Global Warming

According to CEQA Guidelines §15002(a)(1), one of the basic purposes of CEQA is to, "Inform governmental decision makers and the public about the potential, significant environmental effects of proposed activities." Although a discussion of global warming impacts is not currently required by the CEQA Statutes or Guidelines, it is the view of the State Legislature (as expressed in its adoption of AB 32, *The California Climate Solutions Act of 2006*) that global warming poses significant adverse effects to the environment of the state of California and the entire world. In addition, the global scientific community has expressed very high confidence (i.e., at least 90 percent) that global warming is anthropogenic, i.e., caused by humans, and that global warming will lead to adverse climate change effects around the globe (IPCC 2007). Therefore,

the potential global warming impacts that may occur during implementation of the Draft General Plan are analyzed below.

Overview

Atmospheric greenhouse gases (GHGs) and clouds within the earth's atmosphere influence the earth's temperature by absorbing most of the infrared radiation rising from the earth's sun-warmed surface that would otherwise escape into space. This process is commonly known as the Greenhouse Effect. The GHGs and clouds, in turn, radiate some heat back to the earth's surface and some out to space. The resulting balance between incoming solar radiation and outgoing radiation from both the earth's surface and atmosphere keeps the planet habitable.

However, anthropogenic (i.e., caused by humans) emissions of GHGs into the atmosphere enhance the Greenhouse Effect by absorbing the radiation from other atmospheric GHGs that would otherwise escape to space, thereby trapping more radiation in the atmosphere and causing temperature to increase. The human-produced GHGs responsible for increasing the Greenhouse Effect and their relative contribution to global warming are: carbon dioxide (CO₂) (53 percent); methane (CH₄) (17 percent); near-surface ozone (O₃) (13 percent); nitrous oxide (N₂O) (12 percent); and chlorofluorocarbons (CFCs) (5 percent). The most common GHG is CO₂, which constitutes approximately 84 percent of all GHG emissions in California. Worldwide, the state of California ranks as the 12th to 16th largest emitter of CO₂ (the most prevalent GHG) and is responsible for approximately 2 percent of the world's CO₂ emissions (CEC 2006a).

The increasing emissions of these GHGs—primarily associated with the burning of fossil fuels (during transport, electricity generation, industry, manufacturing, etc.) and deforestation, as well as agricultural activity and [the decomposition of](#) solid waste—have led to a trend of unnatural warming of the earth's temperature, which is causing changes in the earth's climate. This increasing temperature phenomenon is known as global warming and the climatic effect is known as climate change or global climate change. The State Legislature adopted the public policy position that global warming is, “a serious threat to the economic well-being, public health, natural resources, and the environment of California” (Health and Safety Code § 38501). Further, the state legislature has determined that, “the potential adverse impacts of global warming include the exacerbation of air quality problems, a reduction in the quality and supply of water to the state from the Sierra snowpack, a rise in sea levels resulting in the displacement of thousands of coastal businesses and residences, damage to marine ecosystems and the natural environment, and an increase in the incidences of infectious disease, asthma, and other human health-related problems”, and that, “Global warming will have detrimental effects on some of California's largest industries, including agriculture, wine, tourism, skiing, recreational and commercial fishing, and forestry (and)... will also increase the strain on electricity supplies necessary to meet the demand for summer air-conditioning in the hottest parts of the State” (Health and Safety Code § 38501). These public policy statements became law with the enactment of AB 32, Statutes of 2006.

Regulatory Setting

Federal Plans, Policies, Regulations, and Laws

As of this writing, there are no adopted federal plans, policies, regulations or laws mandating reductions in GHG emissions that cause addressing global warming. According to the U.S. Environmental Protection Agency (EPA), “the United States government has established a comprehensive policy to address climate change” that includes slowing the growth of emissions; strengthening science, technology and institutions; and enhancing international cooperation. To implement this policy, “the Federal government is using voluntary and incentive-based programs to reduce emissions and has established programs to promote climate technology and science.” The federal government’s goal is to reduce the greenhouse gas intensity (a measurement of greenhouse gas emissions per unit of economic activity) of the American economy by 18 percent over the 10-year period from 2002 to 2012. In addition, EPA administers multiple programs that encourage voluntary GHG reductions, including ENERGY STAR, Climate Leaders, and Methane Voluntary Programs (EPA 2007).

State Plans, Policies, Regulations, and Laws

Assembly Bill 32, the California Climate Solutions Act of 2006 (Health and Safety Code § 38500 et seq.)

In September 2006, Governor Arnold Schwarzenegger signed Assembly Bill (AB) 32, the California Climate Solutions Act of 2006. In general, AB 32 directs the California Air Resources Board (CARB or State Board) to do the following:

- On or before June 30, 2007, the Air Resources Board shall publicly make available a list of discrete early action GHG emission reduction measures that can be implemented prior to the adoption of the statewide GHG limit and the measures required to achieve compliance with the statewide limit;
- By January 1, 2008, determine the statewide levels of GHG emissions in 1990, and adopt a statewide GHG emissions limit that is equivalent to the 1990 level (an approximately 25 percent reduction in existing statewide GHG emissions);
- On or before January 1, 2010, adopt regulations to implement the early action GHG emission reduction measures;
- On or before January 1, 2011, adopt quantifiable, verifiable and enforceable emission reduction measures by regulation that will achieve the statewide GHG emissions limit by 2020, to become operative on January 1, 2012 at the latest. The emission reduction measures may include direct emission reduction measures, alternative compliance mechanisms, and potential monetary and nonmonetary incentives that reduce GHG emissions from any sources of categories of sources as the Air Resources Board finds necessary to achieve the statewide GHG emissions limit; and
- The Air Resources Board shall monitor compliance with and enforce any emission reduction measure adopted pursuant to Assembly Bill 32.

Assembly Bill 32 also takes into account the relative contribution of each source or source category to protect adverse impacts on small businesses and others by requiring the Air Resources Board to recommend a de minimis threshold of GHG emissions below which emissions reduction requirements would not apply. Assembly Bill 32 also allows the Governor to adjust the deadlines mentioned above for individual regulations or the entire state to the earliest feasible date in the event of extraordinary circumstances, catastrophic events, or threat of significant economic harm.

Executive Order #S-3-05

Executive Order #S-3-05, signed by Governor Arnold Schwarzenegger on June 1, 2005, calls for a reduction in GHG emissions to 1990 levels by 2020 and for an 80-percent reduction in GHG emissions **below 1990 levels** by 2050. Executive Order #S-3-05 also calls for the California Environmental Protection Agency (CalEPA) to prepare biennial science reports on the potential impact of continued global warming on certain sectors of the California economy. The first of these reports, “Scenarios of Climate Change in California: An Overview” (Climate Scenarios report), was published in February 2006 (California Climate Change Center 2006).

The Climate Scenarios report uses a range of emissions scenarios developed by the Intergovernmental Panel on Climate Change (IPCC) to project a series of potential warming ranges (i.e., temperature increases) that may occur in California during the 21st century: lower warming range (3.0-5.5°F); medium warming range (5.5-8.0°F); and higher warming range (8.0-10.5°F). The Climate Scenarios report then presents analysis of future climate in California under each warming range.

As shown above, each emissions scenario would result in substantial temperature increases for California. According to the report, substantial temperature increases would result in a variety of impacts to the people, economy, and environment of California associated with a projected increase in extreme conditions, with the severity of the impacts depending upon actual future emissions of GHGs and associated warming. Under the emissions scenarios of the Climate Scenarios report (California Climate Change Center 2006), the impacts of global warming in California are anticipated to include, but are not limited to, the following:

Public Health

Higher temperatures are expected to increase the frequency, duration, and intensity of conditions conducive to air pollution formation. For example, days with weather conducive to ozone formation are projected to increase from 25 to 35 percent under the lower warming range to 75 to 85 percent under the medium warming range. In addition, if global background ozone levels increase as predicted in some scenarios, it may become impossible to meet local air quality standards. Air quality could be further compromised by increases in wildfires, which emit fine particulate matter that can travel long distances depending on wind conditions. The Climate Scenarios report indicates that large wildfires could become up to 55 percent more frequent if GHG emissions are not significantly reduced.

In addition, under the higher warming scenario, there could be up to 100 more days per year with temperatures above 90°F in Los Angeles and 95°F in Sacramento by 2100. This is a large increase over historical patterns and approximately twice the increase projected if temperatures remain within or below the lower warming range. Rising temperatures will increase the risk of death from dehydration, heat stroke/exhaustion, heart attack, stroke, and respiratory distress caused by extreme heat.

Water Resources

A vast network of man-made reservoirs and aqueducts capture and transport water throughout the state from northern California rivers and the Colorado River. The current distribution system relies on Sierra Nevada mountain snowpack to supply water during the dry spring and summer months. Rising temperatures, potentially compounded by decreases in precipitation, could severely reduce spring snowpack, increasing the risk of summer water shortages.

If GHG emissions continue unabated, more precipitation will fall as rain instead of snow, and the snow that does fall will melt earlier, reducing the Sierra Nevada spring snowpack by as much as 70 to 90 percent. Under the lower warming scenario, snowpack losses are expected to be only half as large as those expected if temperatures were to rise to the higher warming range. How much snowpack will be lost depends in part on future precipitation patterns, the projections for which remain uncertain. However, even under the wetter climate projections, the loss of snowpack would pose challenges to water managers, hamper hydropower generation, and nearly eliminate all skiing and other snow-related recreational activities.

The state's water supplies are also at risk from rising sea levels. An influx of saltwater would degrade California's estuaries, wetlands, and groundwater aquifers. Saltwater intrusion caused by rising sea levels is a major threat to the quality and reliability of water within the southern edge of the Sacramento/San Joaquin River Delta – a major state fresh water supply.

Global warming is also projected to seriously affect agricultural areas, with California farmers projected to lose as much as 25 percent of the water supply they need, decrease the potential for hydropower production within the state (although the effects on hydropower are uncertain), and seriously harm winter tourism. Under the lower warming range, the ski season at lower elevations could be reduced by as much as one month. If temperatures reach the higher warming range and precipitation declines, there might be many years with insufficient snow for skiing and snowboarding.

Agriculture

Increased GHG emissions are expected to cause widespread changes to the agriculture industry reducing the quantity and quality of agricultural products statewide. Although higher carbon dioxide levels can stimulate plant production and increase plant water-use efficiency, California's farmers will face greater water demand for crops and a less reliable water supply as temperatures rise. Crop growth and development will change, as will the intensity and frequency of pest and disease outbreaks. Rising temperatures will likely aggravate ozone pollution, which makes plants more susceptible to disease and pests and interferes with plant growth.

Plant growth tends to be slow at low temperatures, increasing with rising temperatures up to a threshold. However, faster growth can result in less-than-optimal development for many crops, so rising temperatures are likely to worsen the quantity and quality of yield for a number of California's agricultural products. Products likely to be most affected include wine grapes, fruits and nuts, and milk.

In addition, continued global warming will likely shift the ranges of existing invasive plants and weeds and alter competition patterns with native plants. Range expansion is expected in many species while range contractions are less likely in rapidly evolving species with significant populations already established. Should range contractions occur, it is likely that new or different weed species will fill the emerging gaps. Continued global warming is also likely to alter the abundance and types of many pests, lengthen pests' breeding season, and increase pathogen growth rates.

Forests and Landscapes

Global warming is expected to intensify this threat by increasing the risk of wildfire and altering the distribution and character of natural vegetation. If temperatures rise into the medium warming range, the risk of large wildfires in California could increase by as much as 55 percent, which is almost twice the increase expected if temperatures stay in the lower warming range. However, since wildfire risk is determined by a combination of factors including precipitation, winds, temperature, and landscape and vegetation conditions, future risks will not be uniform throughout the state. For example, if precipitation increases as temperatures rise, wildfires in southern California are expected to increase by approximately 30 percent toward the end of the century. In contrast, precipitation decreases could increase wildfires in northern California by up to 90 percent.

Moreover, continued global warming will alter natural ecosystems and biological diversity within the state. For example, alpine and subalpine ecosystems are expected to decline by as much as 60 to 80 percent by the end of the century as a result of increasing temperatures. The productivity of the state's forests is also expected to decrease as a result of global warming.

Rising Sea Levels

Rising sea levels, more intense coastal storms, and warmer water temperatures will increasingly threaten the state's coastal regions. Under the higher warming scenario, sea level is anticipated to rise 22 to 35 inches by 2100. Elevations of this magnitude would inundate coastal areas with salt water, accelerate coastal erosion, threaten vital levees and inland water systems, and disrupt wetlands and natural habitats.

California Solar Initiative

As part of the California Solar Initiative, the state has set a goal to create 3,000 megawatts of new solar-produced electricity by 2017 through the provision of approximately \$3.3 billion in incentives to existing residential customers and all non-residential customers by the California

Public Utility Commission (CPUC) and to new residential customers by the California Energy Commission (CEC).

Executive Order S-20-04 – The California Green Building Initiative

Governor Schwarzenegger signed Executive Order S-20-04 (“The California Green Building Initiative”) establishing the State’s priority for energy and resource-efficient high performance buildings on December 14, 2004. The Executive Order sets a goal of reducing energy use in state-owned and private commercial buildings by 20 percent in 2015 using non-residential Title 20 and 24 standards adopted in 2003 as the baseline. The California Green Building Initiative also encourages private commercial buildings to be retrofitted, constructed and operated in compliance with the state’s Green Building Action Plan.

Senate Bill 1368

Senate Bill (SB) 1368 is the companion bill of AB 32 and was signed by Governor Schwarzenegger in September 2006. SB 1368 required the California Public Utilities Commission (PUC) to establish a GHG emission performance standard for baseload generation from investor-owned utilities by February 1, 2007. Similarly, the CEC was tasked with establishing a similar standard for local publicly owned utilities by June 30, 2007. These standards cannot exceed the GHG emission rate from a baseload combined-cycle natural gas fired plant. The legislation further requires that all electricity provided to California, including imported electricity, must be generated from plants that meet the standards set by the PUC and the CEC. In January 2007, the PUC adopted an interim GHG Emissions Performance Standard, which requires that all new long-term commitments for baseload generation entered into by investor-owned utilities have emissions no greater than a combined cycle gas turbine plant (i.e., 1,100 pounds of CO₂ per megawatt-hour). A “new long-term commitment” refers to new plant investments (new construction), new or renewal contracts with a term of 5 years or more, or major investments by the utility in its existing baseload power plants. In May 2007, the CEC approved regulations that prohibit the state’s publicly owned utilities from entering into long-term financial commitments with plants that exceed the standard adopted by the PUC of 1,100 pounds of CO₂ per megawatt hour.

Senate Bill 107

Senate Bill (SB) 107 of 2006 requires investor owned utilities in the state such as San Diego Gas and Electric to increase their total procurement of eligible renewable energy resources by at least an additional one percent of retail sales per year so that 20 percent of retail electricity sales come from renewable energy sources by December 31st, 2010. Previously, state law required achievement of this 20 percent requirement by 2017.

Assembly Bill 1493

In 2002, then Governor Gray Davis signed AB 1493. AB 1493 required the ARB to develop and adopt, by January 1, 2005, regulations that achieve “the maximum feasible reduction of greenhouse gases emitted by passenger vehicles and light-duty truck and other vehicles

determined by the ARB to be vehicles whose primary use is noncommercial personal transportation in the state.”

To meet the requirements of AB 1493, ARB approved amendments to the California Code of Regulations (CCR) adding GHG emission standards to California’s existing motor vehicle emission standards in 2004. Amendments to CCR Title 13 Sections 1900 (CCR 13 1900) and 1961 (CCR 13 1961) and adoption of Section 1961.1 (CCR 13 1961.1) require automobile manufacturers to meet fleet average GHG emission limits for all passenger cars, light-duty trucks within various weight criteria, and medium-duty passenger vehicle weight classes beginning with the 2009 model year. Emission limits are further reduced each model year through 2016.

Emission requirements adopted as part of CCR 13 1961.1 are shown in **Table 5.2-1**. For passenger cars and light-duty trucks 3,750 pounds or less loaded vehicle weight (LVW), the 2016 GHG emission limits are approximately 37 percent lower than the during the first year of the regulations in 2009. For medium-duty passenger vehicles and light-duty trucks 3,751 LVW to 8,500 pounds gross vehicle weight (GVW), GHG emissions are reduced approximately 24 percent between 2009 and 2016.

Table 5.2-1
Fleet Average GHG Exhaust Emission Requirements Included in CCR 13 1961.1

Vehicle Model Year	Fleet Average GHG Emissions (grams per mile CO² equivalents)	
	All Passenger Cars; Light-Duty Trucks 0-3,750 lbs loaded vehicle weight (LVW)¹	Light-Duty Trucks 3,751 lbs LVW to 8,500 lbs gross vehicle weight (GVW); Medium-Duty Passenger Vehicles¹
<u>2009</u>	<u>323</u>	<u>439</u>
<u>2010</u>	<u>301</u>	<u>420</u>
<u>2011</u>	<u>267</u>	<u>390</u>
<u>2012</u>	<u>233</u>	<u>361</u>
<u>2013</u>	<u>227</u>	<u>355</u>
<u>2014</u>	<u>222</u>	<u>350</u>
<u>2015</u>	<u>213</u>	<u>341</u>
<u>2016</u>	<u>205</u>	<u>332</u>

lbs = pounds

¹ Specific Characteristics of Passenger Cars, Light-Duty Trucks, and Medium-Duty Passenger Vehicles are provided in CCR 13 1900 as amended to comply with AB 1493.

In December 2004 a group of car dealerships, automobile manufacturers, and trade groups representing automobile manufactures filed suit against the ARB to prevent enforcement of CCR 13 1900 and CCR 13 1961 as amended by AB 1493 and CCR 13 1961.1 (Central Valley Chrysler-Jeep et al., v. Catherine E. Witherspoon, in her official capacity as Executive Director of the California Air Resources Board et al.). The suit, being heard in the U.S. District Court for the Eastern District of California, contends that California’s implementation of regulations that in effect regulate vehicle fuel economy violates various federal laws, regulations, and policies.

To date, the suit has not been settled, and the judge has issued an injunction stating ARB cannot enforce the regulations in question before receiving appropriate authorization from the EPA.

In January 2007, the judge hearing the case accepted a request from the State Attorney General's office that the trial be postponed until a decision is reached by the U.S. Supreme Court on a separate case addressing GHGs. In the Supreme Court Case, *Massachusetts vs. EPA*, the primary issue in question is whether the federal CAA provides authority for the EPA to regulate CO₂ emissions. In April 2007, the U.S. Supreme Court ruled in *Massachusetts'* favor, holding that GHGs are air pollutants under the CAA. In May 2007, the EPA held two public hearings on ARB's request for EPA authorization to implement the GHG reductions measure for motor vehicles required by AB 1493. As of this writing, the *Central Valley Chrysler-Jeep* case is still pending before the U.S. District Court in eastern California and the EPA has not made a decision on ARB's request for authorization to implement the GHG reduction measure for motor vehicles.

Senate Bill 1505

Senate Bill (SB) 1505 of 2006 establishes environmental performance standards for the production and use of hydrogen fuel for transportation purposes in the state. In general, SB 1505 specifically requires that: hydrogen fueled vehicles reduce GHG emissions by at least 30 percent compared to emissions from new gasoline vehicles; at least one-third of the hydrogen produced or dispensed for transportation purposes in the state must be made from renewable sources of electricity; well-to-tank emissions of smog-forming pollutants from hydrogen fuel dispensed in the state must be reduced by at least 50 percent when compared to gasoline; and emissions of toxic contaminants must be reduced to the maximum extent feasible compared to gasoline on a site specific basis.

Local Plans and Programs

City of San Diego Sustainable Community Program and Climate Protection Action Plan

On January 29, 2002, the San Diego City Council unanimously approved the San Diego Sustainable Community Program. Included in this program are: The City's GHG Emission Reduction Program, which sets a reduction target of 15 percent by 2010, using 1990 as a baseline; establishment of a scientific *Ad Hoc* Advisory Committee to expand the GHG Emission Reduction Action Plan for the City organization and broaden the scope to include community actions; membership in the International Council for Local Environmental Initiatives (ICLEI) City for Climate Protection (CCP) Campaign to reduce GHG emissions; and charter membership in the California Climate Action Registry.

The City of San Diego's -Climate Protection Action Plan (2005) -calls for the City to achieve a 15 percent reduction in GHG emissions by 2010. The CPAP is hereby incorporated into the EIR by reference. This action plan -projects that global warming would result in impacts to the City associated with water and energy shortages, loss of beaches and coastal property, higher average temperatures, and decreases in revenue from tourism and agriculture. According to the action plan in the City (including all residential, business, and commercial sectors within the City limits) the transportation sector (i.e., vehicle miles traveled) is responsible for approximately one-half (51 percent) of GHG emissions, followed by energy (electricity and natural gas) consumption (29 percent), and solid waste/landfills (20 percent). For the City's municipal operations, solid waste landfills represents a plurality (25 percent) of GHG emissions, followed

by employee commutes (23 percent), water and sewage operations and facilities (18 percent), City buildings (17 percent), the City's vehicle fleet (12 percent), and streetlights (five percent). Overall, City residents and businesses are responsible for approximately 98 percent of GHG emissions (15.3 million tons) within the City, while municipal government operations are responsible for the remaining two percent (0.2 million tons) (City of San Diego 2005).

In recognition of the fact that local action is needed to reduce the impacts of global warming, the action plan provides a series of recommendations to be implemented by the City in order to achieve the 15 percent reduction in GHG emissions (using 1990 as a baseline) by 2010. Baseline (1990) GHG emissions for the City were estimated at 15.5 million tons of carbon-dioxide equivalent¹. If no action were taken to address GHG emissions before 2010, the City is forecasted to emit 22.5 million tons of carbon dioxide equivalent in 2010. The goal of a 15 percent reduction in GHG emissions equals a total of 13.2 million tons of carbon dioxide equivalent in 2010. Therefore, achievement of the 15 percent reduction would require the City to reduce total GHG emissions by 9.3 million tons of carbon dioxide equivalent. In order to achieve this goal, the GHG emission reduction measures of the action plan target emissions from the transportation, energy and waste sectors through a two-phase strategy.

During Phase One (1994-2003) of the emission reduction strategy, the City reduced total GHG emissions by 3.8 million tons of carbon dioxide equivalent through a combination of increasing energy efficiency, retrofitting transit infrastructure, recycling, and recovering landfill gas. Approximately 3.6 million tons (95 percent) of the emissions reductions were associated with the capture of methane gas from solid waste landfills and sewage treatment plants, as well as recycling programs. The City needs to reduce GHG emissions by an additional 5.5 million tons of carbon dioxide equivalent by 2010 to meet its goal for a 15 percent reduction. In order to meet this goal, the Climate Protection Action Plan calls for the City to reduce GHG emissions through the reduction measures listed below:

Transportation

- Develop and implement a plan to reduce gasoline fuel consumption in each of four light duty vehicle categories by no less than five percent, relative to fleet size, by 2008 (using 2005 as a baseline);
- Provide an information campaign and incentives to encourage the use of vehicles that meet or exceed the Super Ultra Low Emission Vehicle (SULEV) rating;

Energy Efficiency and Renewable Energy

¹ Carbon-dioxide equivalent is a calculation that enables all GHG emissions to be considered as a group in order to measure the impact of all GHG emissions. This is necessary because GHGs vary widely in their ability to absorb radiation and trap heat in the atmosphere, which means their power to affect the climate—or their global warming potential—also varies widely. The global warming potential of GHGs is measured relative to the global warming potential of CO₂. For example, since CH₄ and NO_x are approximately 23 and 300 times more powerful than CO₂, respectively, in their ability to trap heat in the atmosphere, they have global warming potentials of 23 and 300 (CO₂ has a global warming potential of 1). The global warming potential of each GHG is then multiplied by the prevalence of that gas to produce a carbon-dioxide equivalent.

- Continue to implement the 50-Megawatt Renewable Energy Goal, which establishes the goal for adding 50-Megawatts of renewable energy for City operations by 2013. Renewable energy includes photovoltaic solar panels, solar thermal panels, solar thermal water heating panels, wind generators, landfill gas generations, small hydroelectric generators, geothermal energy systems, and other renewable technologies;
- Continue to use methane as an energy source from inactive and closed landfills;
- Purchase energy efficient products that either meet Energy Star specifications or are in the upper 25 percent of energy efficiency standards.

Waste

- Continue to implement the Construction and Demolition Debris (C&D) Diversion Deposit Ordinance to reduce the amount of GHG emissions associated with the disposal of solid waste into landfills;
- Consider bolder incentives to expand waste minimization efforts:
 - Develop and adopt a construction and demolition recycling ordinance;
 - Develop and adopt a commercial paper recycling ordinance; and
 - Develop and adopt a multifamily recycling ordinance.

Urban Heat Island

- Develop and adopt a Urban Heat Island Mitigation Policy that includes the planting of shade trees, the use of alternative materials for roads and roofing, and land use techniques to combat urban heat island effect;
- Continue to implement the Community Forest Initiative by planting 5,000 shade trees per year on public property through 2020;
- Adopt a Public Tree Protection Policy to protect existing trees on public property from being cut down in order to maintain shade areas and prevent the CO₂ stored within trees from being released into the atmosphere.

Affordable/in-Fill Housing and Sustainable Buildings Expedite Program

The Affordable/in-Fill Housing and Sustainable Buildings Expedite Program (“Expedite Program”) is an optional program providing expedited permit processing for all eligible affordable/in-fill housing and sustainable building projects that pay a supplemental fee. Eligible projects are provided with a more aggressive processing timeline than other ineligible projects by receiving: mandatory initial review meetings for early staff feedback; reduced project review cycles; funding for the environmental initial study; and scheduling of a public hearing immediately upon completion of the environmental document at the applicant’s request. Eligible sustainable buildings include ministerial and discretionary residential, commercial and industrial

development projects that utilize photovoltaic systems (solar panels) to generate a certain percentage of the project's energy needs consistent with City Council Policy 900-14, Sustainable Building Policy as shown in **Table 5.2-2**:

Table 5.2-2
Sustainable Building Expedite Program Criteria

<u>Project Type</u>	<u>Required percentage of projected total energy use from a photovoltaic system</u>
<u>Ministerial Process</u>	
<u>Residential</u>	<u>50%</u>
<u>Commercial or Industrial</u>	<u>30%</u>
<u>Discretionary Process</u>	
<u>Residential (4 units or more)</u>	<u>50%</u>
<u>Commercial or Industrial</u>	<u>30%</u>

Source: Council Policy 900-14.

Cumulative Impact Analysis

Population growth anticipated to occur during the course of Draft General Plan implementation is expected to result in increased emissions of GHGs, largely due to increased vehicle miles traveled (VMT), as well as increased energy consumption and waste generation. As discussed previously, increased emissions of GHGs would contribute to global warming and the adverse global environmental effects thereof. Increased GHG emissions could also potentially conflict with the requirement of AB 32 to reduce statewide GHG emissions to 1990 levels by 2020. Vehicular GHG emissions result from CO₂, CH₄, and N₂O that is released during the combustion of gasoline or diesel fuel in the vehicles.

Increased energy consumption and waste generation result in increased GHG emissions associated with the burning of fossil fuels for energy production and the release of landfill gas associated with storing solid waste in landfills. The City's Climate Protection Action Plan established a baseline (1990) and projected future (2010) GHG emissions from the energy, transportation, and waste sectors to measure the effectiveness the action plan's emission reduction measures. **Table 5.2-13** provides the total amount of GHG emissions from these three sectors and each sector's percentage of the City's total GHG emissions for 1990 and 2010 without implementation of the action plan (no action).

Table 5.2-31
City of San Diego Greenhouse Gas Emissions
1990 Baseline and 2010 “No Action” Projection

Source	1990 Baseline (% of Total)	1990 Baseline (Tons/Year GHG)	2010 “No Action” Projection (% of Total)	2010 “No Action” Projection (Tons/Year GHG)
Energy	29%	4,507,000	43%	9,749,000
Transportation	51%	7,892,000*	40%	8,951,000
Waste	20%	3,148,000	17%	3,817,000
Totals		15,547,000		22,517,000

Source: City of San Diego Climate Protection Action Plan 2005.

Notes:

1 This table includes total GHG emissions from all residences, businesses, industries, municipal operations and other sources within City limits.

2 The Climate Protection Action Plan estimates of transportation-related GHG emissions include emissions from the consumption of gasoline, diesel, propane, and CNG for vehicles and electricity for rail. The GHG emissions estimates resulting from VMT under the Draft General Plan include only GHG emissions from the consumption of gasoline.

As shown on the table above, transportation-related GHG emissions comprised 51 percent of the City’s total emissions in 1990, and are anticipated to account for 40 percent of the City’s 2010 emissions. Therefore, increased VMT (i.e., transportation) is anticipated to be a substantial source of GHG emissions associated with future projected population growth anticipated to occur during Draft General Plan implementation. Although there are no universally accepted methodologies for quantifying vehicular emissions of GHGs, methodologies for calculating GHG emissions do exist and are presented below to provide a rough calculation of GHG emissions associated with projected future vehicle travel².

According to **Section 3.15** of this Program EIR, 2005 daily VMT is 35,014,269 and projected daily VMT is 42,914,375 in 2030. Interpolation of the 2005 and 2030 VMT figures was used to estimate projected year 2020 daily VMT at 39,754,333 and 2006 (existing) daily VMT at 35,330,273. Assuming a future 2020 fuel economy average of 22.779 miles per gallon (mpg) (California Department of Transportation 2005) and the GHG emission factors as shown on **Table 5.2-42**, VMT would generate approximately 6.3 million tons of carbon dioxide-equivalent in 2020 and approximately 6.7 million tons of carbon dioxide-equivalent in 2030.

Table 5.2-24 GHG Vehicle Emission Factors (lbs./gallon)		
CO₂	CH₄	N₂O
19.564	0.00055	0.0002

Source: Source Inventory of Bay Area Greenhouse Gas Emissions, Bay Area Air Quality Management District, November 2006.

² The GHG emissions estimates for VMT under the Draft General Plan include only GHG emissions from the consumption of gasoline. Vehicles powered by other fuels including diesel, propane, and CNG would generate additional GHG emissions. The Assumptions and methodology used to calculate GHG emissions from VMT under the Draft General Plan are provided in **Appendix B**.

Using existing and 1990 VMT and fuel economy figures, VMT within the City generated approximately 5.4 million tons of carbon dioxide-equivalent in 1990 and existing VMT generates approximately 5.8 million tons of carbon dioxide-equivalent. Consequently, projected 2020 GHG emissions associated with VMT are approximately 16 percent higher than 1990 levels and about eight percent higher than existing levels. Projected 2030 GHG emissions associated with VMT are approximately 24 percent higher than 1990 levels and about 16 percent higher than existing levels. Although the City's Climate Protection Action Plan includes measures to reduce GHG emissions, these measures are not anticipated to substantially reduce the GHG emissions associated with the projected VMT increase described above.

Furthermore, **Table 5.2-13** above indicates that the energy and waste sectors are projected to account for 60 percent of the City's total greenhouse gas emissions by generating approximately 9.7 and 3.8 million tons of carbon dioxide-equivalent, respectively, under the 2010 "No Action" projection. According to **Table 5.2-35**, the City has reduced solid waste-related GHG emissions by approximately 3.6 million tons annually and reduced energy-related GHG emissions by approximately 0.1 million tons annually.

Table 5.2-35
Total Greenhouse Gas Emissions Reductions

Measures	GHG Reductions (Tons/Year)
Energy Conservation	127,194
Transportation Measures	55,163
Solid Waste Measures	3,631,568
Total	3,813,925

Source: City of San Diego Climate Protection Action Plan 2005.

Notes:

1. This table includes total GHG reductions from all residences, businesses, industries, municipal operations and other sources within City limits.
2. These data are from 2003, the latest year for which reductions are available.

As shown above, total GHG reductions in the energy sector have been modest. Although the City's action plan includes measures to further reduce energy-related GHG emissions by 2010, these measures are not anticipated to substantially reduce the GHG emissions associated with the energy consumed by future discretionary development projects (e.g., residences, businesses, and other land uses and buildings) that occur in accordance with the Draft General Plan. Therefore, in addition to increased VMT, it is assumed that energy consumption associated with population growth and development that occurs in accordance with the Draft General Plan will also result in substantial levels of GHG emissions in excess of existing and 1990 levels.

However, the City has already reduced a sizeable portion of solid waste-related GHG emissions, and such emissions are anticipated to be a considerably lower percentage of the City's total future GHG emissions than shown on **Table 5.2-13**.

As discussed previously, emission reduction measures targeting sources of GHG emissions called for in AB 32 will likely be adopted in the near future, although no measures have yet been adopted, and it is unknown at this time if these measures will apply to local governments. In

addition, the California Air Resources Board has not yet developed “de minimis” criteria establishing the level of GHG emissions that would not be subject to the emission reduction measures. Furthermore, most of the emission reduction measures of the City’s Climate Protection Action Plan do not address GHG emissions associated with the VMT, energy consumption, and waste generation related to discretionary development projects. Therefore, since future (i.e., 2020 and 2030) GHG emissions are projected to exceed existing and 1990 levels by sizeable margins, the incremental GHG emissions associated with development under the Draft General Plan would cause a cumulatively considerable incremental contribution to the significant cumulative (worldwide) impacts when viewed in connection with worldwide GHG emissions. By generating increased emissions that contribute to global warming, development that occurs in accordance with the Draft General Plan would incrementally contribute to the adverse economic, public health, natural resources, and other environmental impacts projected to occur in California and throughout the world as a result of global warming.

5.3 Mitigation Framework

The existing GHG emission reduction measures being implemented by the City as part of its Climate Protection Action Plan described above reduce the City’s generation of GHGs that contribute to the significant worldwide impacts of global warming. In addition, the City’s process for the review and evaluation of discretionary projects includes environmental review and documentation pursuant to CEQA, as well as an analysis of those projects for consistency with the goals, policies, and recommendations of the General Plan. However, most of the GHG emissions reduction measures of the Climate Protection Action Plan do not apply to the GHG emissions associated with discretionary development projects.

In response to comments made on the Draft General Plan PEIR during the public review period, the City has undertaken the following actions to reduce the GHG emissions of future development under the General Plan and meet its obligations under CEQA to mitigate the cumulatively significant global warming impacts of the General Plan: (1) modify the policy language of the October 2006 Draft General Plan to expand and strengthen climate change policies; (2) ensure that policies to reduce greenhouse gas (GHG) emissions are imposed on future development and City operations by incorporating them into the Mitigation Monitoring and Reporting Program (MMRP) for the Final EIR; and (3) initiate work on a General Plan Action Plan to identify measures such as new or amended regulations, programs and incentives to implement the GHG reduction policies.

Based on this approach, the Conservation Element of the General Plan has been revised to: incorporate an overview of climate change; discuss existing state and City actions to address climate change impacts; and establish comprehensive policies that would reduce the GHG emissions of future development, the existing community-at-large, and City operations. A key new Conservation Element policy is to “reduce the City’s carbon footprint” and to “develop and adopt new or amended regulations, programs and incentives as appropriate to implement the goals and policies set forth” related to climate change (CE-A.2). Additional policies have been added to “collaborate with climate science experts” to allow informed public decisions (CE-A.3) and to “regularly monitor and update the City’s Climate Protection Action Plan (CE-A.13).” The overall intent of these new policies is to unequivocally support climate protection actions, while

retaining flexibility in the design of implementation measures which could be influenced by technological advances, environmental conditions, state and federal legislation, or other factors.

In addition, the Draft General Plan Land Use and Community Planning; Mobility; Urban Design; and Public Facilities, Services, and Safety elements have been edited to better support GHG reduction and climate change adaptation goals. These elements contain policy language related to sustainable land use patterns, alternative modes of transportation, energy efficiency, water supply, and GHG emissions associated with landfills. The General Plan also calls for the City to employ sustainable building techniques, minimize energy use, maximize waste reduction and diversion, and implement water conservation measures. The City's efforts to reduce GHG emissions are further bolstered by existing City programs including the Sustainable Community Program, the Climate Protection Action Plan, the Environmentally Preferable Purchasing Program, and numerous City Council policies addressing resource conservation and management. The overall intent of these new policies is to unequivocally support climate protection actions, while retaining flexibility in the design of implementation measures which could be influenced by technological advances, environmental conditions, state and federal legislation, or other factors.

In addition, the Draft General Plan Land Use and Community Planning; Mobility; Urban Design; and Public Facilities, Services, and Safety elements have been edited to better support GHG reduction and climate change adaptation goals. These elements contain policy language related to sustainable land use patterns, alternative modes of transportation, energy efficiency, water supply, and GHG emissions associated with landfills. The General Plan also calls for the City to employ sustainable building techniques, minimize energy use, maximize waste reduction and diversion, and implement water conservation measures. The City's efforts to reduce GHG emissions are further bolstered by existing City programs including the Sustainable Community Program, the Climate Protection Action Plan, the Environmentally Preferable Purchasing Program, and numerous City Council policies addressing resource conservation and management.

As discussed above, the City's process for the evaluation of discretionary projects includes environmental review and documentation pursuant to CEQA, as well as analysis of those projects for consistency with the goals, policies and recommendations of the General Plan. In general, implementation of the policies in the MMRP and the measures in the Action Plan discussed above as well as compliance with federal, state, and local regulations would avoid or reduce their incremental contribution to the significant worldwide increase in GHG emissions. However, for some projects it is possible that adherence to the policies in the MMRP and the measures in the Action Plan may not adequately avoid or reduce incremental impacts, and such projects would require additional measures.

These additional measures would be considered mitigation. For each future discretionary project requiring mitigation (i.e., measures that go beyond what is required by existing programs, plans, and regulations), project-specific measures will be identified with the goal of reducing incremental project-level impacts to less than significant or the incremental contributions of a project may remain significant and unavoidable where no feasible mitigation exists. Where

mitigation is determined to be necessary and feasible, these measures will be included in a Mitigation Monitoring and Reporting Program (MMRP) for the project. Mitigation Framework Measures include the comprehensive General Plan policies designed to reduce the GHG emissions of future development.

- ~~▪Future development under the Draft General Plan must conform to the City of Villages Strategy to the extent feasible, which promotes GHG emission reductions by focusing the City's future growth into transit-oriented mixed-use activity centers that promote increased walking, bicycling, and use of public transit.~~
- ~~▪Development project proposals must include the minimization of GHG emissions to the extent feasible as an important design criterion during the pre-application and development review process.~~

These general measures, in addition to measures identified in **Section 3.2.4** Air Quality, and **3.14.4** Public Utilities (see Energy subsection), may be implemented to preclude avoid or reduce impacts. The measures may be updated, expanded, and refined when applied to specific future projects based on project-specific design and changes in existing conditions, and local, state, and federal laws.

~~In addition to these project-specific measures, it is recommended that the City:~~

- ~~▪Establish a global warming monitoring program that includes periodic inventories of GHG emissions associated with all residences, businesses, industries, municipal operations and other sources within the City limits to monitor the effectiveness of existing GHG emissions reduction measures and plans. If the global warming monitoring program shows that existing measures and plans are not reducing GHG emissions, the City should implement feasible measures to reduce GHG emissions.~~

5.4 Significance of Impact with Mitigation Framework

The degree of future impacts and applicability, feasibility, and success of future mitigation measures cannot be adequately known for each specific future project at this program level of analysis. Therefore, the cumulatively considerable incremental contribution to the worldwide increase in GHG emissions represented by development that is anticipated to occur with implementation of the Draft General Plan is considered significant and unavoidable.

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6.0 OTHER MANDATORY DISCUSSION AREAS

6.1 Significant Irreversible Environmental Changes

Implementation of the Draft General Plan could result in future actions and development projects that could cause permanent changes to the existing environment. While the Draft General Plan encourages future development to be located in existing infill and redevelopment areas, there will still be some conversion of undeveloped land to urbanized uses. These conversions of vacant lands to urban development are considered to be permanent irreversible changes to the environment. Additionally, future infrastructure and construction projects likely to occur consistent with the policies of the Draft General Plan would result in localized impacts to communities that are unavoidable due to various issues (e.g., engineering, community character, socio-economic, and economic feasibility).

Future development allowed pursuant to the General Plan would result in several irreversible commitments of limited resources. These resources include, but are not limited to, the following: lumber and other related forest products; sand, gravel, and concrete; asphalt; petrochemical construction materials; steel, copper, lead and other metals; and water consumption. Buildout according to the Draft General Plan also represents a long-term commitment to the consumption of fossil fuel oil, natural gas, and gasoline. These increased energy demands relate to construction, lighting, heating and cooling of buildings, and transportation of people within, to and from the Draft General Plan area.

6.2 Unavoidable Significant Environmental Impacts

Implementation of the Draft General Plan has the potential to result in significant, project level and cumulative unavoidable impacts to the following areas:

<ul style="list-style-type: none"> ▪ Agricultural Resources ▪ Air Quality ▪ Biological Resources ▪ Geologic Conditions ▪ Health and Safety ▪ Historic Resources ▪ Hydrology ▪ Land Use ▪ Mineral Resources 	<ul style="list-style-type: none"> ▪ Noise ▪ Paleontological Resources ▪ Population and Housing ▪ Public Services and Facilities ▪ Public Utilities ▪ Transportation / Traffic Circulation / Parking ▪ Visual Effects and Neighborhood Character ▪ Water Supply and Quality
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6.3 Areas of No Significant Impact

No environmental issue areas analyzed in this EIR were determined to have no significant impact.

7.0 ALTERNATIVES ANALYSIS

7.1 Introduction

The primary intent of the alternatives analysis in an EIR, as stated in §15126.6(a) of the State CEQA Guidelines, is to “describe a range of reasonable alternatives to the project, or to the location of the project, which would feasibly attain most of the basic objectives of the project but would avoid or substantially lessen any of the significant effects of the project, and evaluate the comparative merits of the alternatives.” Further, the CEQA Guidelines state that “the discussion of alternatives shall 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, or would be more costly” (Guidelines §15126.6(b)). An EIR must describe a range of reasonable alternatives to the proposed project that could feasibly attain most of the basic objectives of the project. The feasibility of an alternative may be determined based on a variety of factors, including but not limited to economic viability, availability of infrastructure, and other plans or regulatory limitations (Guidelines §15126.6(f)(1)).

7.2 Project Objectives

As indicated above, the choice of alternatives is guided primarily by the need to either avoid or substantially lessen significant impacts and to achieve most project objectives. As stated in **Section 2.34.1**, Purposes and Objectives of the General Plan, the project objectives established by the City are to preserve or achieve:

- An open space network formed by parks, canyons, river valleys, habitats, beaches, and ocean;
- Diverse residential communities formed by the open space network;
- Compact and walkable mixed-use villages of different scales within communities;
- Employment centers for a strong economy;
- An integrated regional transportation network of transit, roadways, and freeways that efficiently link communities and villages to each other and to employment centers;
- High quality, affordable, and well-maintained public facilities to serve the City’s population, workers, and visitors;
- Historic districts and sites that respect our heritage;
- Balanced communities that offer opportunities for all San Diegans and share citywide responsibilities;
- A clean and sustainable environment; and

- A high aesthetic standard.

7.3 Comparative Analysis of Alternatives

There are many potential General Plan alternatives that could be considered for implementation by the City. Analysis of every possible alternative is infeasible and would be redundant. Furthermore, CEQA does not require that every alternative be considered. This section describes the reasonable range of alternatives that were developed by the City during the planning process for the EIR.

~~Eight-Nine~~ alternatives were identified by the City for examination and analysis in this EIR. The alternatives considered in the EIR are:

- Alternative Location
- City of Villages Increased Growth Alternative
- General Intensification Alternative
- Reduced Density/Maintain Existing Neighborhood Character
- Reduced Industrial Lands Protections Alternative
- No Project
- Enhanced Sustainability
- Increased Parking Management
- Concentrated Growth

The alternatives presented above have undergone varied levels of analysis, depending on their potential feasibility and ability to reduce significant effects. Five of the nine alternatives were determined to be infeasible and rejected from further analysis as described below in **Section 7.3.1**.

7.3.1 Alternatives Considered but Rejected From Further Analysis

Consistent with CEQA, primary consideration was given to alternatives that could reduce significant impacts, while still meeting most of the project objectives. All alternatives were subject to a preliminary feasibility analysis. Five of the alternatives were determined to be infeasible as a result of this review and rejected from further consideration. The rejected alternatives are described below.

Alternative Location

According to the State CEQA Guidelines, the range of alternatives should include evaluation of alternative “locations that would avoid or substantially lessen any of the significant effects of the

project” (Guidelines §15126.6(f)(2)(A)). The proposed Project is a General Plan, which guides the future development of the City of San Diego. Since the proposed Project is specific to the City of San Diego, no feasible alternative location exists that could be used for meaningful analysis.

City of Villages Increased Growth Alternative

Under this alternative, 17,000 to 37,000 multifamily dwelling units in excess of adopted community plan capacity would be added to areas of the City with a high propensity for village development as shown in the Draft General Plan. The assumptions of this alternative are similar to the analysis undertaken for the Strategic Framework Element (SFE) Final EIR, in which the environmental impacts of the addition of 17,000 to 37,000 units located on the City of Villages Map were evaluated.

The SFE Final EIR evaluated the citywide impacts of these additional units, but did not provide site-specific analyses. The City received many comment letters asking for an analysis of more detailed, site- and community-specific environmental impacts related to these units. Members of the public also recommended that village sites be designated through the community plan update process, with attention to public facilities, traffic and neighborhood character issues among others.

As a part of the process to update the General Plan, City staff further investigated whether sites identified on the City of Villages Map, which was ultimately adopted as the City of Villages Opportunities Area Map¹ in the City of Villages Action Plan, would be suitable for village development. Given the complexity of the sites and the communities in which they are located, and the public interest in the planning process, staff concluded that the more detailed study and environmental analysis of potential village sites would best occur at the community plan level. Policies were included in the Land Use and Community Planning Element outlining the role of the General Plan and community plans, and calling for the community plans to provide site-specific land use and design recommendations that implement the citywide vision. To implement the General Plan and to maintain internal consistency, the City Planning and Community Investment department is developing a work program to update all community plans over a 12-year period.

Therefore, this alternative was rejected from further analysis because mandating the addition of 17,000 to 37,000 units to areas of the City with high village propensity through General Plan policies would be inconsistent with the City’s established community planning program, which identifies community plans as the appropriate vehicle for determining detailed land use designations and site-specific recommendations, and it is unlikely to be implemented since a proposal similar to the City of Villages Increased Growth Alternative faced intense public opposition and was rejected by the Mayor and City Council in 2002.

General Intensification Alternative

This alternative was originally considered as a means of accommodating future population growth equally among the City’s communities. This alternative would—similar to the City of

¹ City of San Diego, Action Plan, Appendix A, 2002

Villages Increased Growth Alternative—add approximately 17,000 to 37,000 residential units to the City in excess of adopted community plan capacity. However, instead of targeting the additional units to community plan areas with high village propensity as shown in the Draft General Plan., the additional residential units would be distributed equally throughout every community in the City irrespective of its village propensity. The number of residential units added to each community under this alternative would be proportional to the community's size. By locating new residential units equally throughout the City, this alternative would result in fewer localized traffic impacts and greater attainment of the balanced communities' project objective. However, this alternative was rejected from further consideration because accommodating future growth equally through the communities of the City irrespective of village propensity would not meet several of the primary project objectives. First, by directing growth equally throughout City, this alternative would result in new housing development within areas of varying degrees of village propensity. Although communities with a higher village propensity would be able to accommodate the new growth under this alternative, communities with a lower village propensity do not include the, public facilities and services, mixture of land uses, walkable design, proximity to transit stations, higher frequency transit service, and/or other characteristics needed to accommodate residential intensification while meeting project objectives.

Under this alternative, all communities would be forced to accommodate their proportion of the City's new residential units regardless of environmental considerations such as canyons, habitat, and other valuable open spaces or environmentally sensitive lands. Thus, environmentally sensitive lands would be subject to increased development pressure. In addition, providing infrastructure and public services to serve new growth in all communities would be less efficient and more expensive. Environmental impacts associated with traffic, air quality, biological resources, land use, public facilities and possibly others would likely increase under this alternative. Also, this alternative would not necessarily meet project objectives of achieving walkable, mixed-use villages, an integrated and efficient regional transportation network, high-quality, affordable public facilities, a clean and sustainable environment, and an open space network formed by parks, canyons, habitat, and other open spaces.

Reduced Density/Maintain Existing Neighborhood Character Alternative

This alternative was considered as a means to reduce growth in the City to a level below that which could currently be built in accordance with the City's adopted community plans in order to maintain the existing character of the City's neighborhoods. Under this alternative, the General Plan policy would call for residential density reductions to occur in conjunction with community plan updates. This alternative could result in a reduction in planned densities in communities with a higher village propensity as well as in other areas throughout the City in an effort to minimize change.

Reducing the residential density of adopted community plans would reduce the City's housing stock and increase the demand for housing. Since population growth and demand for housing would continue to increase over time regardless of the residential density reductions, this alternative would likely (1) force many of the housing units needed to accommodate the City's projected population growth outside of the City into other jurisdictions such as other cities in the county and undeveloped portions of San Diego, Riverside, and Imperial counties as well as Baja California, and (2) result in the overcrowding of existing units, the division of existing single-

family homes into multiple units, or other changes to existing neighborhoods as a result of increased housing demand combined with limited housing supply.

In the short-term, this alternative would reduce localized traffic congestion and noise impacts, and maintain the character of existing neighborhoods. However, the short-term benefits of this alternative would lessen and eventually disappear altogether with time as unplanned growth would occur under one or both of the two scenarios described above. Over the long-term, growth would likely increase the environmental impacts associated with agricultural resources, air quality, biological resources, hydrology, paleontological resources, noise, traffic, water quality and possibly others.

Further, reducing the City's housing capacity would be inconsistent with the City's adopted Housing Element and state law pertaining to the provision of housing opportunities. State housing element law requires that the City identify an adequate amount of multifamily zoned land or take other actions to accommodate their share of the region's lower income housing needs. The City's Housing Element, which was adopted in December 2006, identified adequate multifamily zoned land for the 2005-2010 housing element cycle consistent with state requirements. Therefore, this alternative would be infeasible since it would increase the environmental impacts of the Draft General Plan and conflict with the City's adopted Housing Element and state housing element law.

Reduced Industrial Lands Protections Alternative

The Reduced Industrial Lands Protection Alternative would not identify Prime Industrial Lands (i.e., areas that support economic base sector employment activities) or policies intended to protect the industries located on such lands. Specifically, this alternative would eliminate the policies of the Draft General Plan prohibiting: (1) the conversion of Prime Industrial Lands to non-industrial land uses, (2) the collocation of residential or non-industrial uses into industrial uses on Prime Industrial Lands, and (3) discretionary projects for public assembly or sensitive receptor lands uses on Prime Industrial Lands. In addition, all General Plan policies (e.g., residential and industrial collocation) that apply to industrial areas or employment lands not identified as Prime Industrial lands under the Draft General Plan would be applied to all industrial areas and employment lands under this alternative.

This alternative is analyzed as an alternative to the Prime Industrial Lands policies of the Draft General Plan. Therefore, this alternative is analyzed for conformance with project objectives associated with industrial lands. According to the Economic Prosperity Element of the Draft General Plan, the project goals associated with industrial lands include the following:

- A diversified economy with a focus on providing quality employment opportunities and livable wages for San Diegans;
- A city with sufficient employment, land and capacity for base sector industries appropriate designed to sustain a strong economic base;
- Efficient use of existing employment lands; and

- No loss of employment land for base sector industries that contribute significantly to the regional or local economy.

Since goals (2) and (4)—half of the project goals associated with industrial lands—would not be achieved, this alternative was rejected from further analysis.

7.3.2 Alternatives Analyzed in this Section

The four remaining alternatives that are comparatively analyzed in this section are:

- No Project
- Enhanced Sustainability
- Increased Parking Management
- Concentrated Growth

In response to comments made on the Draft General Plan PEIR during the public review period, the City has undertaken the following actions to reduce the GHG emissions of future development and City operations under the General Plan and meet its obligations under CEQA to mitigate the cumulatively significant global warming impacts of the General Plan: (1) modify the policy language of the October 2006 Draft General Plan to expand and strengthen climate change policies; (2) ensure that policies to reduce greenhouse gas (GHG) emissions are imposed on future development and City operations by incorporating them into the Mitigation Monitoring and Reporting Program (MMRP) for the Final EIR; and (3) initiate work on a General Plan Action Plan to identify measures such as new or amended regulations, programs and incentives to implement the GHG reduction policies.

Based on this approach, the Conservation Element of the General Plan has been revised to: incorporate an overview of climate change; discuss existing state and City actions to address climate change impacts; and establish comprehensive policies that would reduce the GHG emissions of future development, the existing community-at-large, and City operations. A key new Conservation Element policy is to “reduce the City’s carbon footprint” and to “develop and adopt new or amended regulations, programs and incentives as appropriate to implement the goals and policies set forth” related to climate change (CE-A.2). Additional policies have been added to “collaborate with climate science experts” to allow informed public decisions (CE-A.3) and to “regularly monitor and update the City’s Climate Protection Action Plan (CE-A.13).” The overall intent of these new policies is to unequivocally support climate protection actions, while retaining flexibility in the design of implementation measures which could be influenced by technological advances, environmental conditions, state and federal legislation, or other factors.

In addition, the Draft General Plan Land Use and Community Planning; Mobility; Urban Design; and Public Facilities, Services, and Safety elements have been edited to better support GHG reduction and climate change adaptation goals. These elements contain policy language related to sustainable land use patterns, alternative modes of transportation, energy efficiency, water supply, and GHG emissions associated with landfills. The Draft General Plan also calls for the City to employ sustainable building techniques, minimize energy use, maximize waste

reduction and diversion, and implement water conservation measures. By adding these comprehensive policies into the Draft General Plan and MMRP and identifying Action Plan measures to implement these policies, the City has incorporated the principal objectives of the environmentally superior Enhanced Sustainability Alternative into the Draft General Plan. Furthermore, the addition of Policy ME-G.5 to the Mobility Element to “implement parking strategies that are designed to help reduce the number and length of automobile trips ...” implements the principal objective of the Increased Parking Management Alternative.

No Project

This alternative is analyzed within this Program EIR as it is required under CEQA Guidelines §15126.6(e). According to §15126.6(e)(2) of the CEQA Guidelines, which states that the “no project” analysis shall discuss, “...what is reasonably expected to occur in the foreseeable future if the project were not approved, based on current plans and consistent with available infrastructure and community services.” When the project is the revision of an existing land use policy, CEQA Guidelines §15126.6(e)(3)(A) states that “the No Project Alternative will be the continuation of the existing plan...into the future.” So, for the purposes of this Program EIR, the No Project Alternative represents buildout under the currently adopted plans as further described below. This alternative does not represent a “no build” scenario in which no future development would occur.

Under the No Project Alternative (~~No Project Alternative~~), the Draft General Plan would not be implemented and projected future growth would occur in accordance with the 1979 *Progress Guide and General Plan* (existing General Plan or 1979 General Plan), the Strategic Framework Element, which was adopted by the City Council in October 2002, and the City’s Housing Element, which was adopted in December 2006. The existing General Plan, primarily addressed development of vacant land and provision of adequate public facilities in new communities. In addition, the existing General Plan does not have a distinct Land Use Element, but relies exclusively on community plans to provide land use designations and policies.

Currently, developable vacant land accounts for only 3.6 percent or 6,756 acres of the City’s total acreage, meaning a majority of future growth will occur in infill and redevelopment areas. While infill development is addressed in some of the City’s community plans, the existing General Plan does not establish an effective citywide framework for how to remedy facility deficits, prioritize capital improvements, or to preserve or create a high quality of life as the City matures. The existing General Plan, therefore, is out-of-date, and largely irrelevant for directing the type of future growth and development anticipated to occur in the years to come. The Strategic Framework Element includes the City of Villages Strategy, which provides guidance to meet projected housing and employment needs and to preserve and enhance the City’s many communities and neighborhoods as growth occurs through reinvestment in existing communities. Implementation of the City of Villages Strategy does not encourage or mandate a specific amount of growth. Rather, the Strategic Framework Action Plan indicates that the City of Villages Strategy would be implemented through a series of actions including a comprehensive update to the existing General Plan followed by updates to existing community plans as necessary to achieve consistency with the updated General Plan and implement the City of Villages Strategy.

While community plans could still be updated in the absence of an updated General Plan, there would not be a framework in place to implement citywide policies and to achieve citywide goals,

and the Strategic Framework Element would not be fully implemented. Therefore, future growth and development under the No Project Alternative would occur in accordance with the out-of-date policies for directing future growth and inadequate public facilities strategies of the existing General Plan. In addition, there would be no guidance to streamline the preparation of community plans, or to standardize the approximately 160 different land use designations currently in effect. However, community plan updates that take place under this alternative would be subject to the requirements of state Housing Element law to plan for the City's share of projected regional housing needs.

The State of California General Plan Guidelines (2003) call for internal consistency among all elements of a General Plan. Under the No Project Alternative there would be inconsistencies among the 1979 General Plan, community plans and the Strategic Framework Element (such as different approaches to prioritization, inconsistent land use category definitions, inconsistent transit strategies, outdated baseline information, lack of updated public facilities guidelines, differing industrial land use policies, and lack of adequate walkability design guidelines to implement adopted policies) with no overall strategy on how to remedy these inconsistencies. In addition, the General Plan Guidelines state that "most jurisdictions select 15 to 20 years as the long-term horizon for the general plan," and that "a general plan based upon outdated information and projections is not a sound basis for day-to-day decision-making and may be legally inadequate (p. 14). The existing General Plan was last comprehensively updated in 1979.

Relationship to the Project Objectives

This alternative would meet some of the project objectives (see Section 7.2). Objectives Numbers 1, 2, 7, 8, and 9 could be generally met through adherence to adopted community plans and citywide policies such as the Strategic Framework Element City of Villages strategy and the Balanced Communities Council Policy. It would only partially implement project objective Numbers 3 and 5, as it would be more difficult to implement the City of Villages strategy and qualify for regional transportation funds in the absence of a coordinated General Plan framework. Objective Number 4 would also be partially met through existing policies, but would place industrial/employment lands at greater risk than under the Draft General Plan. Objective 6 would not likely be met as the Draft General Plan provides updated public facilities guidelines and strategies for remedying public facilities deficiencies that are not addressed in the 1979 General Plan.

Environmental Effects

Agricultural Resources

According to **Section 3.8**, Land Use, 6,055 acres, or 2.8 percent of the City's total acreage is in existing agricultural use. However, some existing agricultural lands are currently planned for non-agricultural land uses. As a result, implementation of existing plans would decrease the amount of agricultural land uses to 3,670 acres, or 1.7 percent of the City's total acreage. Since the Draft General Plan does not directly propose any land use changes within the City, the loss of existing agricultural lands planned for non-agricultural uses would be similar under both the Draft General Plan and the No Project Alternative.

As discussed in **Section 3.12**, Population and Housing, the City's population is projected to increase by 361,110 persons and its housing stock is projected to increase by 119,983 units by 2030. Population growth is primarily a function of economic and demographic factors and these projections would be similar under both the Draft General Plan and the No Project Alternative. As previously discussed above, developable vacant land accounts for only 3.6 percent or 6,756 acres of the City's total acreage. Since the amount of vacant developable land is limited, development under this alternative and the Draft General Plan would similarly exhaust the limited supply of vacant land. As a result, the remaining 3,670 acres currently planned for agricultural use would be subject to increasing development pressure under both this alternative and the Draft General Plan as population growth increases and the City plans for its share of regional housing needs as required by state law. Therefore, implementation of this alternative would result in similar agricultural resources impacts when compared to the Draft General Plan.

Air Quality

This alternative would not include a comprehensive strategy for encouraging future growth through infill and redevelopment in areas with existing or planned transit investments. In addition, growth under this alternative would be less likely to result in walkable, transit-oriented developments and therefore less conducive to transit use, biking, and walking. Thus, this alternative would likely result in a higher proportion of automobile trips and greater traffic congestion than development under the Draft General Plan. The higher proportion of automobile trips would result in greater emissions of criteria pollutants and greater traffic congestion would increase the number of CO hot spots at intersections within the plan area. Therefore, implementation of this alternative would result in greater air quality impacts associated with increased vehicular emissions and an increased number of CO hot spots when compared to the Draft General Plan. Air quality impacts associated with stationary sources and construction activities would be similar when compared to the Draft General Plan.

Biological Resources

As previously discussed above, developable vacant land accounts for only 3.6 percent or 6,756 acres of the City's total acreage. Vacant and undeveloped lands may include biological resources such as native habitat, wetland habitat, sensitive species or function as segments of wildlife movement corridors. Activities associated with urban development such as mass grading, paving of the landscape, the building of structures, fencing, vehicular traffic, increased ambient noise levels, and roadway and public utility construction on or adjacent to such resources could result in significant impacts to native habitat and wildlife, and habitat fragmentation and isolation. As discussed in **Section 3.12**, Population and Housing, population growth would be similar under both the Draft General Plan and the No Project Alternative. As a result, the remaining 6,756 acres of vacant land would be subject to increasing development pressure under both this alternative and the Draft General Plan as the population increases and the City plans for its share of regional housing needs as required by state law. Since the supply of vacant developable land is limited, it would likely be similarly exhausted under this alternative or the Draft General Plan. In addition, development under this alternative would not be subject to substantially different local, state, and federal regulations, policies, or plans regarding the protection of habitat, wetlands, sensitive species and other biological resources. Therefore, implementation of this alternative would result in similar biological resources impacts when compared to the Draft General Plan.

Geologic Conditions

Implementation of the No Project Alternative would not substantially alter the City's projected population growth or housing unit increase. As a result, this alternative would not result in the exposure of a substantially different number people or property to geologic hazards such as groundshaking, fault rupture, landslides and others.

The development of structures and impervious surfaces and the removal of vegetative cover on undeveloped lands generally increase the potential for wind and water erosion of soils. Since the pressure to develop the City's remaining vacant land would not be substantially different as the population increases and the City plans for its share of regional housing needs as required by state law, the potential for wind and water erosion of soils would not change. Furthermore, compliance with local, state, and federal regulations associated with seismic risks and other geologic hazards would not be substantially different under this alternative. Therefore, implementation of this alternative would result in similar impacts associated with geologic conditions when compared to the Draft General Plan.

Health and Safety

Implementation of existing local, state, and federal regulations would ensure that the exposure of people or sensitive receptors to potential health hazards associated with hazardous materials does not change substantially under this alternative. In addition, due to climate, topography, and native vegetation, some of the City's new and existing development will be highly subject to wildland fires under this alternative and the Draft General Plan.

Furthermore, this alternative would continue to allow new development within flood prone areas in accordance with local, state and federal floodplain regulations. Therefore, implementation of this alternative would result in similar health and safety impacts when compared to the Draft General Plan.

Historic Resources

Developable vacant land accounts for only 3.6 percent or 6,756 acres of the City's total acreage. Since the amount of vacant developable land is limited, development under this alternative and the Draft General Plan would similarly exhaust the limited supply of vacant land resulting in similar impacts to buried cultural resources. Additionally, as population growth occurs and the supply of vacant and developable land within the City is exhausted, the pressure to develop within existing communities will continue to increase. This infill and redevelopment would have a similar potential to impact important historic resources under this alternative or the Draft General Plan. Mandatory compliance with existing local, state, and federal regulations would further ensure that implementation of this alternative would result in similar impacts to historic and archaeological resources when compared to the Draft General Plan.

Hydrology

As previously discussed above, developable vacant land accounts for only 3.6 percent or 6,756 acres of the City's total acreage. Development of these lands would cover natural vegetated

pervious groundcover with impervious surfaces such as paved highways, streets, rooftops, and parking lots. The introduction of new or expanded impermeable surface areas can potentially affect existing hydrology including absorption rates, drainage patterns, and the rate of surface runoff. The plan area is currently highly urbanized and features a large amount of impermeable surface areas.

As discussed in **Section 3.12**, population growth would be similar under both the Draft General Plan and the No Project Alternative. As a result, the remaining 6,756 acres of vacant land would be subject to increasing development pressure under both this alternative and the Draft General Plan as the population increases and the City plans for its share of regional housing needs as required by state law. Since the supply of vacant developable land is limited, it would likely be similarly exhausted under this alternative or the Draft General Plan.

Although new development under the No Project Alternative would be subject to the Strategic Framework Element City of Villages strategy and could be more compact as a result, the amount of new impervious surfaces introduced under this alternative, when considered with the large amount of existing impervious surface, would not significantly increase the amount of impervious surfaces within the plan area. Furthermore, development under this alternative would comply with all applicable local, state, and federal regulations associated with hydrology. Therefore, implementation of this alternative would result in similar hydrologic impacts when compared to the Draft General Plan.

Land Use

Development under the No Project Alternative would comply with the mandatory policies of any adopted environmental plans, policies or regulations of any state or federal agency, including applicable habitat conservation plans as well as adopted Airport Land Use Compatibility Plans.

Since development under the No Project Alternative would occur in accordance with existing community plans, this alternative would not result in impacts to the environmental goals or land use designations of these plans. Because community plans would remain in effect, impacts associated with physically dividing an established community would also be similar to the Draft General Plan. Community plans are used to identify the community's street network, and policies are in place to protect community character under both the No Project Alternative as well as the Draft General Plan. Development under this alternative would not result in substantially different impacts associated with adopted Airport Land Use Compatibility Plans.

Furthermore, development under the No Project Alternative would be less likely to occur through infill and redevelopment over the short-term as remaining vacant developable land is developed. As a result, impacts related to land use incompatibilities associated with infill and redevelopment, such as close proximity of sensitive receptors to noise from traffic, industrial, and entertainment uses, would be less over the short-term. However, as population growth occurs and the supply of vacant and developable land within the City is exhausted, the pressure to develop within existing communities will increase and eventually occur at a similar level when compared to the Draft General Plan. Without the Draft General Plan policies that encourage infill and redevelopment and minimize the potential for associated land use incompatibilities, environmental impacts related to land use incompatibilities associated with

infill and redevelopment could be greater over the long-term. Therefore, implementation of this alternative would result in greater land use impacts when compared to the Draft General Plan.

Mineral Resources

Impacts to mineral resources occur when access to resources is restricted or prohibited through development of lands containing the resources or when incompatible land uses are developed in close proximity thereby reducing the likelihood for extraction of those resources. However, mandatory compliance with existing local, state, and federal regulations protecting valuable mineral resources would ensure that implementation of this alternative would result in similar impacts to mineral resources when compared to the Draft General Plan.

Noise

The plan area is an existing highly urbanized environment with ambient sources of noise including vehicular traffic, buses, trucks, trains, aircraft and various stationary sources such as industrial and entertainment land uses. Since this alternative would not substantially alter the projected population growth and level of economic activity within the plan area, the amount of noise generated by the sources described above would not change substantially under this alternative when compared to the Draft General Plan. In addition, the amount of construction activity and related short-term noise impacts would not change substantially.

Furthermore, development under the No Project Alternative would be less likely to occur through infill and redevelopment over the short-term as remaining vacant developable land is developed. As a result, impacts related to the exposure of sensitive receptors to incompatible noise levels would be less over the short-term. However, as population growth occurs and the supply of vacant and developable land within the City is exhausted, the pressure to develop within existing communities, and the likelihood of exposing of sensitive receptors to incompatible noise levels, will increase and eventually occur at a similar level when compared to the Draft General Plan. Therefore, over the long-term, implementation of this alternative would result in similar impacts associated with the exposure of sensitive receptors to substantial noise levels when compared to the Draft General Plan. Development under this alternative would comply with the land use compatibility policies of adopted Comprehensive Land Use Plans for airports within and near the plan area impacts associated with the exposure of sensitive receptors to aircraft noise would be similar when compared to the Draft General Plan.

Furthermore, this alternative would not include the proposed change in the Land Use Compatibility Chart included in the Draft General Plan that creates a “conditionally compatible” category, which conditionally permits certain uses in exterior environment with higher ambient noise levels than would be allowed by existing noise standards. However, the “conditionally compatible” category requires new development to undergo detailed noise analysis and incorporate measures to reduce interior noise levels to acceptable levels comparable to existing General Plan policies and project review procedures allow. As a result, noise impacts under this alternative would be similar when compared to the Draft General Plan.

Paleontological Resources

Mass grading, excavation, construction of utility infrastructure and other activities associated with development could impact paleontological resource resources when located on sensitive

geologic formations. Land development regulations would not provide protection for paleontological resources under this alternative or under the Draft General Plan. However, impacts to such resources would be identified and protected through the environmental review process for discretionary projects under both this alternative and the Draft General Plan. Therefore, implementation of this alternative would result in similar paleontological resources impacts when compared to the Draft General Plan.

Population and Housing

Infill and redevelopment can lead to displacement of residents as existing housing units are demolished or replaced with generally more expensive housing units. As areas redevelop, older housing units, and in some cases more affordable housing units, will be replaced by higher cost housing units. Low-income households are most likely to be adversely affected. This could result in displacement and relocation of people away from the City and the region in search of more affordable housing. Displacement could necessitate construction of some replacement housing in the City and/or region. The displacement of people is considered a social and economic impact, but not a CEQA impact. The construction of replacement housing has the potential to result in physical environmental impacts.

Since development under the No Project Alternative would be less likely to occur through infill and redevelopment, the amount of displacement associated with such development would be less over the short-term. However, as population growth occurs and the remaining supply of vacant lands is exhausted, the pressure to develop within existing communities, and the potential for displacement of residents, will increase and eventually occur at a similar level when compared to the Draft General Plan. Therefore, implementation of this alternative would result in similar impacts associated with displacement of substantial numbers of people and housing when compared to the Draft General Plan.

Public Services and Facilities

As previously discussed, many of the City's older, urbanized communities include deficient levels of public services, facilities and utilities, and/or older facilities and infrastructure in need of replacement. During the short-term, this alternative may result in more development on remaining vacant and developable land and less infill and redevelopment. However, over the long-term, development under this alternative and the Draft General Plan would exhaust the limited supply of vacant land result in and a sizeable amount of future growth through infill and redevelopment. Additional growth within the urbanized communities would likely require the construction of new or physically altered public facilities and utilities, the construction of which could result in environmental impacts. Since this alternative would result in a similar amount of infill and redevelopment when compared to the Draft General Plan, impacts associated with the construction of new or physically altered public facilities and utilities would also be similar.

Public Utilities

Since projected population growth would be similar under this alternative, the consumption of available water supplies would be similar under this alternative when compared to the Draft General Plan. Please see the "Public Services and Facilities" section for discussion of

environmental impacts associated with the construction of new or physically altered public utilities.

Transportation/Traffic/Circulation/Parking

Growth under this alternative would be less likely to result in walkable, transit-oriented developments. As a result, the No Project Alternative would likely result in increased automobile trips and reduced multi-modal trips (i.e., transit, biking, and walking). The addition of increased automobile trips to the planned transportation network would increase the number of roadway miles and the percentage of daily vehicle miles traveled at Level of Service E or F. However, existing parking requirements would likely ensure that parking demand does not exceed supply. Therefore, implementation of this alternative would result in greater impacts associated with increased automobile trips and reduced multi-modal trips compared to the Draft General Plan. Impacts related to parking would be similar.

Visual Effects and Neighborhood Character

Since development under the No Project Alternative would be less likely to occur through infill and redevelopment, the amount of negative and substantial change to the existing character of the Plan area would be less over the short-term. However, as population growth occurs and vacant lands are consumed, the pressure to develop within existing communities will increase over time. Existing policies, programs and project review procedures provide a level of assurance similar to proposed Draft General Plan policies that infill and redevelopment is compatible with existing community character. Implementation of this alternative would result in similar impacts to the existing character of the City over the long-term when compared to the Draft General Plan.

Existing City policies would continue to address potential impacts to topography, ground surface relief features and public views from designated open space areas, scenic highways or to any significant visual landmarks or scenic vistas (e.g., mountains, bays, rivers, and the ocean). Although this alternative would be less likely to result in infill and redevelopment with potential to block public views or scenic vistas, impacts to public views or scenic vistas would be similar when compared to the Draft General Plan. Overall, impacts to visual effects and neighborhood character would be similar to the Draft General Plan

Water Quality

As previously discussed above, developable vacant land accounts for only 3.6 percent or 6,756 acres of the City's total acreage. Development of these lands would cover natural vegetated pervious groundcover with impervious surfaces such as paved highways, streets, rooftops, and parking lots. The introduction of new or expanded impermeable surface areas would result in increased runoff, adding to local non-point source pollution. The plan area is currently highly urbanized and features a large amount of impermeable surface areas.

As previously discussed in **Section 3.12**, population growth would be similar under both the Draft General Plan and the No Project Alternative. As a result, the remaining 6,756 acres of vacant land would be subject to increasing development pressure under both this alternative and the Draft General Plan as the population increases and the City plans for its share of regional

housing needs as required by state law. Since the supply of vacant developable land is limited, it would likely be entirely consumed under this alternative or the Draft General Plan. New development under the No Project Alternative, when considered with the large amount of existing impervious surface, would not significantly increase the amount of impervious surfaces within the plan area. Furthermore, development under this alternative would comply with all applicable local, state, and federal regulations related to water quality. Therefore, implementation of this alternative would result in similar water quality impacts when compared to the Draft General Plan.

Global Warming

As previously discussed above, this alternative would not include a comprehensive strategy for encouraging future growth through infill and redevelopment in areas with existing or planned transit investments. Growth under this alternative would be less likely to result in walkable, transit-oriented developments and therefore less conducive to transit use, biking, and walking. Thus, this alternative would likely result in a higher proportion of automobile trips and greater traffic congestion than development under the Draft General Plan. The higher proportion of automobile trips and greater traffic congestion would increase the amount of fuel (primarily gasoline but also diesel) consumption, which would result in greater greenhouse gas (GHG) emissions than the Draft General Plan.

In addition, the No Project alternative would not include the policies of the Draft General Plan to “reduce the City’s carbon footprint ”and to “develop and adopt new or amended regulations, programs and incentives as appropriate to implement the goals and policies set forth” related to climate change (CE-A.2), and to “regularly monitor and update the City’s Climate Protection Action Plan (CE-A.13).” In addition, the No Project Alternative would not include the policy language from the Draft General Plan Land Use and Community Planning; Mobility; Urban Design; and Public Facilities, Services, and Safety elements related to sustainable land use patterns, alternative modes of transportation, energy efficiency, water supply, and GHG emissions associated with landfills. The Draft General Plan also calls for the City to employ sustainable building techniques, minimize energy use, maximize waste reduction and diversion, and implement water conservation measures. As a result, in addition to the increased GHG emissions associated with an increased proportion of automobile trips and greater traffic congestion, the No Project alternative could also result in greater GHG emissions associated with increased non-transportation related energy consumption (i.e., natural gas and electricity) due primarily to the design, orientation and energy efficiency of buildings, the amount of solid waste sent to a landfill, and energy associated with the delivery of water to users in the City.

Although the Draft General Plan includes policies that encourage the recycling of construction waste beyond the level that would occur under this alternative, it is not anticipated that the level of increased construction waste recycling and associated GHG emissions reductions would be substantially greater under the Draft General Plan than under this alternative. In addition, GHG emissions associated with the use of equipment and vehicles during construction activities under this alternative would be similar to the Draft General Plan. Thus, GHG emissions associated with short-term construction activities under this alternative would be similar to the Draft General Plan. Nevertheless, implementation of this alternative would result in greater global warming impacts over the long-term due to increased GHG emissions associated with increased automobile trip and traffic congestion; increased energy consumption from buildings, increased

storage and subsequent decomposition of solid waste in landfills, and increased energy consumption associated with water use when compared to the Draft General Plan.

Enhanced Sustainability

This alternative is analyzed as a means of further reducing the environmental effects of the Draft General Plan related to energy and water consumption, solid waste generation, water quality and air quality. It would likely take several years to develop and adopt new or amended regulations and programs to implement the mandatory policies of this alternative. Specifically, this alternative would add mandatory policies to the Draft General Plan to enhance the sustainability of future development within the plan area. These policies would include requirements for: builders/owners to employ sustainable building techniques (e.g., energy efficient design; landscaped “green” roofs; recycled building materials; renewable energy generation [e.g., solar panels]) in private developments; the installation of recycled water systems for large development projects; and reductions in water consumption associated with existing and future development in the plan area (e.g., landscaping associated with residential land uses, landscaping and fields within parks and open spaces, etc.). As discussed above, by adding similar policies aimed at achieving more sustainable development into the Draft General Plan and MMRP, and identifying Action Plan measures to implement these policies, the City has incorporated the principal objectives of the environmentally superior Enhanced Sustainability Alternative into the Draft General Plan.

Relationship to the Project Objectives

This alternative would meet all of the project objectives and is the environmentally superior alternative.

Environmental Effects

Agricultural Resources

The implementation of requirements for sustainable building techniques, recycled water systems, and reduced water consumption would result in similar impacts to agricultural resources when compared to the Draft General Plan. Please see **Section 3.1** for a discussion of agricultural resources impacts under the Draft General Plan.

Air Quality

The implementation of requirements for sustainable building techniques such as more energy efficient design, landscaped “green roofs” (which reflect solar radiation and cool the interior of buildings) and renewable energy production (i.e., installation of solar panels) would reduce the amount of nonrenewable energy consumed by new development within the plan area under this alternative. As long-term development occurs under this alternative, the prevalence of sustainable buildings could significantly decrease the amount of air pollution associated with the burning of fossil fuels as consumption of nonrenewable energy decreases relative to long-term development under the Draft General Plan. Therefore, long-term development under the Enhanced Sustainability Alternative would result in reduced air quality impacts when compared to the Draft General Plan. However, by incorporating policies for sustainable building

techniques such as more energy efficient design, landscaped “green roofs” (which reflect solar radiation and cool the interior of buildings) and renewable energy production (i.e., installation of solar panels) into the Draft General Plan and MMRP, and identifying Action Plan measures to implement these policies, the City has incorporated the principal objectives of the environmentally superior Enhanced Sustainability Alternative into the Draft General Plan. Therefore, this alternative would have similar impacts to air quality when compared to the Draft General Plan.

Biological Resources

The implementation of requirements for sustainable building techniques, recycled water systems, and reduced water consumption would result in similar impacts to biological resources when compared to the Draft General Plan. Please see **Section 3.3** for a discussion of biological resources impacts under the Draft General Plan.

Geologic Conditions

The implementation of requirements for sustainable building techniques, recycled water systems, and reduced water consumption would result in similar impacts associated with geologic conditions when compared to the Draft General Plan. Please see **Section 3.4** for a discussion of impacts associated with geologic conditions under the Draft General Plan.

Health and Safety

The implementation of requirements for sustainable building techniques, recycled water systems, and reduced water consumption would result in similar impacts to human health and safety when compared to the Draft General Plan. Please see **Section 3.5** for a discussion of human health and safety impacts under the Draft General Plan.

Historic Resources

The implementation of requirements for sustainable building techniques, recycled water systems, and reduced water consumption would result in similar impacts associated with historic resources when compared to the Draft General Plan. Please see **Section 3.6** for a discussion of historic resources impacts under the Draft General Plan.

Hydrology

The implementation of requirements for sustainable building techniques such as landscaped “green roofs” would absorb some rainwater that would otherwise drain into the storm water system. As long-term development occurs under this alternative, the prevalence of sustainable buildings within the plan area could significantly decrease the amount and rate of surface runoff and significantly increase absorption rates of runoff within the plan area relative to the Draft General Plan. Therefore, long-term development under the Enhanced Sustainability Alternative would result in reduced hydrologic impacts when compared to the Draft General Plan. However, by incorporating policies for sustainable buildings and urban heat island mitigation, both of which could result in landscaped “green roofs” into the Draft General Plan and MMRP, and identifying Action Plan measures to implement these policies, the City has incorporated the

principal objectives of the environmentally superior Enhanced Sustainability Alternative into the Draft General Plan.

Land Use

The implementation of requirements for sustainable building techniques, recycled water systems, and reduced water consumption would result in similar land use impacts when compared to the Draft General Plan. Please see **Section 3.8** for a discussion of land use impacts under the Draft General Plan.

Mineral Resources

The implementation of requirements for sustainable building techniques could result in greater reuse of building materials, thereby reducing the demand for raw mineral resources. Therefore, long-term development under the Enhanced Sustainability Alternative would result in fewer mineral resource impacts when compared to the Draft General Plan.

Noise

The implementation of requirements for sustainable building techniques, recycled water systems, and reduced water consumption would result in similar noise impacts when compared to the Draft General Plan. Please see **Section 3.10** for a discussion of noise impacts under the Draft General Plan.

Paleontological Resources

The implementation of requirements for sustainable building techniques, recycled water systems, and reduced water consumption would result in similar paleontological resources impacts when compared to the Draft General Plan. Please see **Section 3.11** for a discussion of paleontological resources impacts under the Draft General Plan.

Population and Housing

The implementation of requirements for sustainable building techniques, recycled water systems, and reduced water consumption would result in similar impacts associated with the displacement of people or housing units, necessitating the construction of replacement housing elsewhere, when compared to the Draft General Plan. Please see **Section 3.12** for a discussion of impacts associated with the displacement of people or housing units under the Draft General Plan.

Public Services and Facilities

The implementation of requirements for sustainable building techniques, recycled water systems, and reduced water consumption would result in similar impacts related to the construction of new or physically-altered public services and facilities associated with police, fire, and schools when compared to the Draft General Plan. Please see **Section 3.13** for a discussion of impacts related to the construction of new or physically-altered public services and facilities under the Draft General Plan.

Public Utilities

The implementation of requirements for sustainable building techniques such as more energy efficient design, the use of recycled building materials, landscaped “green roofs” (which absorb rainwater and reflect solar radiation and cool the interior of buildings) and renewable energy production (i.e., installation of solar panels) as well as requirements for recycled water systems, and reduced water consumption would reduce the consumption of nonrenewable energy and water, and the generation of solid waste and storm water within the plan area under this alternative. As long-term development occurs under this alternative, the prevalence of sustainable buildings, recycled water systems, and continued implementation of requirements for reduced water consumption could significantly reduce the need for the construction of new or physically-altered public utilities infrastructure associated with water, energy, storm water and solid waste (i.e., landfills) and the associated potential construction-related environmental impacts relative to long-term development under the Draft General Plan. In addition, the consumption of available water supplies would be significantly reduced over the long term under this alternative when compared to the Draft General Plan.

Although the need for new or physically altered infrastructure associated with water and the environmental impacts thereof would significantly decrease over the long term, the construction of recycled water infrastructure could result in significant environmental impacts that would not occur under the Draft General Plan. Overall, the significantly reduced potential environmental impacts associated with reduced demand for new or physically altered energy, potable water, storm water and solid waste infrastructure, and the significantly reduced consumption of available water supplies would outweigh the potential significant environmental impacts associated with requirements for recycled water systems. Therefore, long-term development under the Enhanced Sustainability Alternative would result in fewer impacts associated with the construction of new or physically altered public utilities infrastructure when compared to the Draft General Plan. However, by incorporating policies for sustainable building techniques such as more energy efficient design, the use of recycled building materials, landscaped “green roofs” (which absorb rainwater and reflect solar radiation and cool the interior of buildings) and renewable energy production as well as policies addressing recycled water systems, and reduced water consumption into the Draft General Plan and MMRP, and identifying Action Plan measures to implement these policies, the City has incorporated the principal objectives of the environmentally superior Enhanced Sustainability Alternative into the Draft General Plan.

Transportation

The implementation of requirements for sustainable building techniques, recycled water systems, and reduced water consumption would not result in substantially different transportation-related impacts when compared to the Draft General Plan. Please see **Section 3.15** for a discussion of the transportation-related impacts that would occur under the Draft General Plan.

Visual Effects and Neighborhood Character

The implementation of requirements for sustainable building techniques, recycled water systems, and reduced water consumption would result in similar visual or neighborhood character impacts when compared to the Draft General Plan (see **Section 3.16**). Therefore, implementation of this

alternative could result in similar visual effects impacts when compared to the Draft General Plan.

Water Quality

The implementation of requirements for sustainable building techniques such as landscaped “green” roofs would absorb some of the rainwater that would otherwise drain into the storm drain system and natural drainages. Storm water typically flushes anthropogenic pollutants that accumulate on paved surfaces and adjacent areas into the storm drain system and natural drainages, and eventually into the aquatic environment (i.e., lagoons, rivers, lakes and the ocean). The introduction of these pollutants into the aquatic environment can result in significant water quality impacts. As long-term development occurs under this alternative, the prevalence of “green” roofs could significantly reduce the amount of storm water and pollutants that enter the storm drain system and eventually the aquatic environment relative to the Draft General Plan. Therefore, long-term development under the Enhanced Sustainability Alternative would result in reduced water quality impacts when compared to the Draft General Plan. However, by incorporating policies for sustainable building techniques such as landscaped “green roofs” (which absorb rainwater) into the Draft General Plan and MMRP and identifying Action Plan measures to implement these policies, the City has incorporated the principal objectives of the environmentally superior Enhanced Sustainability Alternative into the Draft General Plan.

Global Warming

The implementation of requirements for sustainable building techniques such as more energy efficient design, landscaped “green roofs” (which reflect solar radiation and cool the interior of buildings) and renewable energy production would reduce the amount of nonrenewable energy consumed by new development within the plan area under this alternative. As long-term development occurs under this alternative, the prevalence of sustainable buildings could significantly decrease the amount of GHG emissions associated with the burning of fossil fuels as consumption of nonrenewable energy decreases relative to long-term development under the Draft General Plan. Therefore, long-term development under the Enhanced Sustainability Alternative would result in reduced global warming impacts when compared to the Draft General Plan.

But as explained previously, the City has incorporated policies for sustainable building techniques such as more energy efficient design, landscaped “green roofs” and renewable energy production into the Draft General Plan and MMRP and measures to implement these policies into the Action Plan. By doing so the City has incorporated the principal environmental objectives of environmentally superior Enhanced Sustainability Alternative into the Draft General Plan.

Increased Parking Management

In reality no parking is free, and when the cost of parking is “bundled” with other costs it represents a subsidy to drivers and increases demand for parking over what it would be if the true cost were passed on directly to the user. Increased parking management supports local businesses by increasing on-street parking turnover and more effectively allocating parking

resources. In addition, studies have shown that when direct parking costs increase, there is an associated increase in transit ridership and use of alternative modes of transportation.² Several tools exist to manage parking, some of which include: shared parking that serves multiple destinations; parking pricing/fees; parking meters; time limits; Community Parking Districts; permit parking districts; parking availability and cost information; and enforcement of time limits, garage use for vehicles instead of storage, and other parking restrictions.

This alternative expands upon the currently available parking management tools by expanding implementation of Community Parking Districts and residential permit parking districts throughout the City. This alternative would also increase parking meter fees and extend the hours of operation for existing parking meters. Full implementation of the parking management tools called for in this alternative would likely take several years. The Community Parking District program allows for direct investment and benefit of the parking management revenue generated within its boundaries, thus providing a source of revenue for community infrastructure and amenities. Permit parking districts address transient and spillover parking problems by restricting on-street parking to permit holders within a specified area. This alternative would substantially increase the management of on-street and other public parking facilities and could result in implementation of additional Community Parking Districts, increased time limits of on-street parking, greater use of shared parking, and additional public parking facilities. This alternative could result in reduced free on-street parking in the City, and increased parking-related revenue and hours of parking enforcement, thereby increasing the out-of-pocket consumer cost of parking. This would serve to reduce and/or eliminate a number of automobile trips, reduce parking demand, and increase the number of multimodal trips such as carpooling, transit, walking and biking. This alternative is analyzed as a means of further reducing the environmental effects of the Draft General Plan relating to air quality and traffic.

In response to comments made on the Draft General Plan during the public review period, the City has added Policy ME-G.5 to the Mobility Element to “implement parking strategies that are designed to help reduce the number and length of automobile trips ...” By adding this policy into the Draft General Plan and MMRP, and identifying Action Plan measures to implement this policy, the City has incorporated one of the principal environmental objectives related to the Increased Parking Management Alternative into the Draft General Plan.

Relationship to the Project Objectives

This alternative would meet all of the project objectives and is an environmentally superior alternative.

Environmental Effects

Agricultural Resources

Implementation of this alternative would result in similar agricultural resources impacts compared to the Draft General Plan. Please see **Section 3.1** for a discussion of agricultural resources impacts under the Draft General Plan

² United States Environmental Protection Agency. *Parking Alternatives: Making Way for Urban Infill and Brownfield Redevelopment*. December 1999

Air Quality

The increased parking management alternative would substantially reduce free on-street parking in the City, increase parking meter fees and enforcement hours, thereby increasing the cost of parking. This would serve to reduce the number of automobile trips and vehicle miles traveled as some trips would be replaced by alternative modes of travel such as carpooling, transit, walking and biking. A reduction in vehicular trips would thereby reduce emissions associated with vehicular use. This alternative would have similar impacts related to construction emissions associated with implementing the Draft General Plan. Overall, the increased parking management alternative would result in reduced air quality impacts than development under the Draft General Plan. However, by incorporating Policy ME-G.5 to the Mobility Element to “implement parking strategies that are designed to help reduce the number and length of automobile trips ...” into the Draft General Plan and MMRP, and identifying Action Plan measures to implement this policy, the City has incorporated one of the principal environmental objectives related to the Increased Parking Management Alternative into the Draft General Plan.

Biological Resources

Implementation of this alternative would result in similar biological resources impacts compared to the Draft General Plan. Please see **Section 3.3** for a discussion of biological resources impacts under the Draft General Plan.

Geologic Conditions

Implementation of this alternative would result in similar impacts to geologic conditions compared to the Draft General Plan. Please see **Section 3.4** for a discussion of impacts associated with geologic conditions under the Draft General Plan.

Health and Safety

Implementation of this alternative would result in similar health and safety impacts compared to the Draft General Plan. Please see **Section 3.5** for a discussion of impacts associated with geologic conditions under the Draft General Plan.

Historic Resources

Implementation of this alternative would result in similar historic resources impacts compared to the Draft General Plan. . Please see **Section 3.6** for a discussion of impacts associated with historic resources under the Draft General Plan.

Hydrology

Implementation of this alternative would result in similar hydrology impacts compared to the Draft General Plan. Please see **Section 3.7** for a discussion of impacts associated with hydrology under the Draft General Plan.

Land Use

Implementation of this alternative would result in similar land use compared to the Draft General Plan. Please see **Section 3.8** for a discussion of impacts associated with land use under the Draft General Plan

Mineral Resources

Implementation of this alternative would result in similar mineral resource impacts compared to the Draft General Plan. Please see **Section 3.9** for a discussion of impacts associated with mineral resources under the Draft General Plan.

Noise

Implementation of this alternative would result in similar noise impacts compared to the Draft General Plan. Please see **Section 3.10** for a discussion of impacts associated with noise under the Draft General Plan.

Paleontological Resources

The implementation of requirements for increased parking management would not result in substantially different impacts associated with paleontological resources than would occur under the Draft General Plan. Please see **Section 3.11** for a discussion of impacts associated with paleontological resources under the Draft General Plan. Implementation of this alternative would result in similar paleontological resource impacts compared to the Draft General Plan.

Population and Housing

Implementation of this alternative would result in similar population and housing impacts compared to the Draft General Plan Please see **Section 3.12** for a discussion of impacts associated with population and housing under the Draft General Plan. .

Public Services and Facilities

Implementation of this alternative would result in similar public services and facilities impacts compared to the Draft General Plan. . Please see **Section 3.13** for a discussion of impacts associated with public services and facilities under the Draft General Plan.

Public Utilities

Implementation of this alternative would result in similar public utilities impacts compared to the Draft General Plan. Please see **Section 3.14** for a discussion of impacts associated with public utilities under the Draft General Plan.

Transportation

The increased parking management alternative would substantially reduce free on-street parking in the City, increase parking meter fees and enforcement hours thereby increasing the cost of

parking. This would serve to reduce the number of automobile trips, reduce parking demand, and increase the number of multi-modal trips such as carpooling, transit, walking and biking. Therefore, the increased parking management alternative would result in reduced vehicular transportation impacts than development under the Draft General Plan.

Visual Effects and Neighborhood Character

Implementation of this alternative would result in similar visual effects and neighborhood character impacts compared to the Draft General Plan. Please see **Section 3.14** for a discussion of impacts associated with visual effects and neighborhood character under the Draft General Plan.

Water Quality

Implementation of this alternative would result in similar water quality impacts compared to the Draft General Plan. Please see **Section 3.17** for a discussion of impacts associated with water quality under the Draft General Plan.

Global Warming

The increased parking management alternative would substantially increase the management of on-street and other public parking facilities in the City, thereby increasing the cost of parking. This would serve to reduce the number of automobile trips and vehicle miles traveled as some trips would be replaced by alternative modes of travel such as carpooling, transit, walking and biking. A reduction in vehicular trips would thereby reduce GHG emissions associated with vehicle miles traveled. This alternative would have similar GHG emissions associated with construction activities when compared to the Draft General Plan. Overall, the increased parking management alternative would result in reduced global warming impacts than development under the Draft General Plan. But as explained previously, the City has incorporated Policy ME-G.5 to “implement parking strategies that are designed to help reduce the number and length of automobile trips ...” into the Draft General Plan and MMRP, and measures to implement these policies into the Action Plan. By doing so the City has incorporated one of the principal environmental objectives related to the Increased Parking Management Alternative into the Draft General Plan.

Concentrated Growth

This alternative is analyzed within this Program EIR as a means to focus projected growth into four subareas of the City that are served by high quality transit. Environmental impacts would be greater in these four subareas, but would likely decrease in other areas of the City. Under this alternative, infill and redevelopment would be focused in the Downtown San Diego and Uptown communities; and in Urban Village Centers within the Mission Valley/Morena/Grantville, University/Sorrento Mesa, and Midway-Pacific Highway subareas to a greater extent than is envisioned under the Draft General Plan. In addition, under this alternative, higher density infill and redevelopment would be discouraged in Neighborhood/Community Villages and within Transit Corridors outside of the above-referenced subareas. Due to the high cost of land and the scarcity of vacant developable land in the four subareas, it would be more difficult to secure the

population-based park lands needed to provide public facilities in accordance with General Plan, as compared to the Draft General Plan.

Relationship to the Project Objectives

This alternative would meet or partially meet most of the project objectives (see **Section 7.2**). Objectives Numbers 1, 2, 4, 7, 9, and 10 would be met. It would only partially implement project objective Number 3, as there would be more concentrated growth in fewer communities. Objective Number 5 could potentially be met, but would reduce the transit connectivity among communities as fewer communities would have villages, and may require some redesign of the regional transportation network to add more capacity to the concentrated growth areas. Objective Number 6 would be difficult to implement in the concentrated growth communities, and Objective Number 8 would not be met.

Environmental Effects

Agricultural Resources

The implementation of the Concentrated Growth Alternative would result in similar impacts to agricultural resources than would occur under the Draft General Plan because the alternative and the Draft General Plan both encourage infill and redevelopment to meet future needs, and both provide policy protections for agricultural lands. Please see **Section 3.1** for a discussion of agricultural resources impacts under the Draft General Plan.

Air Quality

The Concentrated Growth alternative would increase densities in areas that are served by some of the most substantial transit capital investments in the region. This alternative would likely serve to increase transit trips to and from these four subareas. In addition, the higher intensities within these areas there would likely result in an increase in walking and the use of alternative modes for internal, local trips. A reduction in vehicular trips would thereby reduce emissions associated with vehicular use. However, there would likely be increased localized air quality impacts at busy intersections within the concentrated growth areas. In addition, some of the citywide air quality benefits may be reduced if transit service in other areas of the city is scaled back due to insufficient densities to make improved transit service cost-effective. This alternative would have similar impacts related to construction emissions associated with implementing the Draft General Plan. Overall, the concentrated growth alternative is expected to result in similar air quality impacts than development under the Draft General Plan.

Biological Resources

The implementation of requirements for concentrated growth would result in similar impacts to biological resources than would occur under the Draft General Plan because the alternative and the Draft General Plan both encourage infill and redevelopment to meet future needs, and both provide policy protections for biological resources. See Section 3.3 for a discussion of biological resources impacts under the Draft General Plan.

Geologic Conditions

Implementation of the Concentrated Growth Alternative would not substantially alter the City's projected population growth or housing unit increase. However, it would result in greater concentrations of people living in areas identified as a "Moderate to High" or "Low to Moderate" geo-technical relative risk areas (see **Figure 3.4-1**). As a result, this alternative could result in the exposure of a substantially greater number of people or property to geologic hazards such as groundshaking, fault rupture, landslides and others.

The development of structures and impervious surfaces and the removal of vegetative cover on undeveloped lands generally increase the potential for wind and water erosion of soils. Since the pressure to develop the City's remaining vacant land would not be substantially different as the population increases and the City plans for its share of regional housing needs as required by state law, the potential for wind and water erosion of soils would not change.

Compliance with local, state, and federal regulations associated with seismic risks and other geologic hazards would not be substantially different under this alternative. However, due to greater numbers of people and property potentially being located in Moderate or High Risk Geo-technical Relative Risk Areas, implementation of this alternative would result in greater impacts associated with geologic conditions when compared to the Draft General Plan.

Health and Safety

Implementation of existing local, state, and federal regulations would ensure that the exposure of people or sensitive receptors to potential health hazards associated with hazardous materials does not change substantially under this alternative. In addition, due to climate, topography, and native vegetation, some of the City's new and existing development will be subject to wildland fires under this alternative, though the impacts would be similar to ~~and~~ the Draft General Plan.

Under this alternative increased intensity would be expected to occur in Mission Valley, which would result in an incremental increase in the number of people living in a flood prone area. However, similar to the Draft General Plan, the impacts to health and safety would be reduced to a less than significant level by new development's adherence to local, state and federal floodplain regulations. ~~Still, Overall,~~ due to the increase concentration of people in flood prone areas, this alternative is expected to result in greater health and safety impacts than the Draft General Plan.

Historic Resources

The implementation of the Concentrated Growth Alternative would result in greater impacts associated with historic resources than would occur under the Draft General Plan. Both the alternative and the Draft General Plan encourage infill and redevelopment and both provide policy protections for historical resources. However, since areas impacted by development under this alternative are located in areas of high sensitivity for historical resources, it is anticipated the impacts to historic resources would be greater. Please see **Section 3.6** for a discussion of impacts associated with historic resources under the Draft General Plan.

Hydrology

The implementation of the Concentrated Growth Alternative would result in similar impacts associated with hydrology than would occur under the Draft General Plan because the alternative and the Draft General Plan both encourage infill and redevelopment to meet future needs, and both provide policy protections for hydrological resources. Please see **Section 3.7** for a discussion of impacts associated with hydrology under the Draft General Plan.

Land Use

Development under the Concentrated Growth Alternative would comply with the mandatory policies of any adopted environmental plans, policies or regulations of any state or federal agency, including applicable habitat conservation plans as well as adopted Airport Land Use Compatibility Plans. Therefore, development under this alternative would not result in substantially different impacts associated with adopted Airport Land Use Compatibility Plans or with adopted environmental plans.

However, development under the Concentrated Growth Alternative would increase densities over what is permitted in existing community plans within the four subareas where growth is to be concentrated. This alternative would also be contrary to existing community plan land use recommendations that call for the development of compact, mixed-use centers in other communities (communities outside of the four subareas).

The Concentrated Growth Alternative as well as the Draft General Plan would follow policies that encourage infill and redevelopment, and minimize the potential for associated land use incompatibilities. However, overall the secondary environmental impacts associated with this alternative would result in greater land use impacts when compared to the Draft General Plan.

Mineral Resources

Impacts to mineral resources occur when access to resources is restricted or prohibited through development of lands containing the resources or when incompatible land uses are developed in close proximity thereby reducing the likelihood for extraction of those resources. However, due to the limited supply of such resources in the City, mandatory compliance with existing local, state, and federal regulations protecting valuable mineral resources it is anticipated that implementation of this alternative would result in similar impacts to mineral resources when compared to the Draft General Plan.

Noise

The plan area is an existing highly urbanized environment with ambient sources of noise including vehicular traffic, buses, trucks, trains, aircraft and various stationary sources such as industrial and entertainment land uses. Since this alternative would not substantially alter the projected population growth and level of economic activity within the plan area, the amount of noise generated by the sources described above would not change substantially under this alternative when compared to the Draft General Plan but would be greater in areas of concentrated growth but less in other areas. In addition, the amount of construction activity and related short-term noise impacts would not change substantially but would be greater in areas of concentrated growth but less in other areas. Development under this alternative would comply

with the land use compatibility policies of adopted Comprehensive Land Use Plans for airports within and near the plan area. Impacts associated with the exposure of sensitive receptors to aircraft noise would be similar when compared to the Draft General Plan. Overall, it is anticipated that noise impacts would be similar when compared to the Draft General Plan.

Paleontological Resources

Mass grading, excavation, construction of utility infrastructure and other activities associated with development could impact paleontological resource resources when such development is located on sensitive geologic formations. It is anticipated that impacts to paleontological resources would be greater in areas of concentrated growth due to the depth of excavation required for such development but lesser in other areas. Land development regulations would not provide protection for paleontological resources under this alternative or under the Draft General Plan. However, impacts to such resources would be identified and protected through the environmental review process for discretionary projects under both this alternative and the Draft General Plan. Overall, implementation of this alternative would result in similar paleontological resources impacts when compared to the Draft General Plan.

Population and Housing

Infill and redevelopment can lead to displacement of residents as existing housing units are demolished or replaced with generally more expensive housing units. As areas redevelop, older housing units, and in some cases more affordable housing units, will be replaced by higher cost housing units. Low-income households are most likely to be adversely affected. This could result in displacement and relocation of people away from the City and the region in search of more affordable housing. Displacement could necessitate construction of some replacement housing in the City and/or region. The displacement of people is considered a social and economic impact, but not a physical CEQA impact. The construction of replacement housing has the potential to result in physical environmental impacts. However, because this alternative would result in less land area being targeted for infill and redevelopment as compared to the Draft General Plan, there would be fewer older housing units affected, and reduced construction impacts to provide replacement housing.

Therefore, implementation of this alternative would result in fewer impacts associated with displacement of substantial numbers of people and housing when compared to the Draft General Plan.

Public Services and Facilities

As previously discussed, many of the City's older, urbanized communities include deficient levels of public services, facilities and utilities, and/or older facilities and infrastructure in need of replacement. Development under this alternative and the Draft General Plan would result in a sizeable amount of future growth occurring through infill and redevelopment. Additional growth within the urbanized communities would likely require the construction of new or physically altered public facilities and utilities, the construction of which could result in environmental impacts.

Since this alternative would result in more focused infill and redevelopment when compared to the Draft General Plan, impacts associated with the construction of new or physically altered public facilities and utilities would likely be increased in the areas of concentrated growth, but reduced in other areas of the city. Overall, it is expected that implementation of this alternative would result in similar public facilities construction impacts when compared to the Draft General Plan.

Public Utilities

Implementation of this alternative would result in similar public utilities impacts compared to the Draft General Plan. Please see **Section 3.14** for a discussion of impacts associated with public utilities under the Draft General Plan.

Transportation/Traffic/Circulation/Parking

Growth under this alternative would result in walkable, transit-oriented developments in limited areas of the City. As a result, the Concentrated Growth Alternative would likely result in decreased automobile trips and increased multi-modal trips (i.e., transit, biking, and walking) in the concentrated growth areas, and could decrease multi-modal trips in other areas of the City where village and transit corridor development would not be realized. In addition, parking supply would likely be more limited in the four subareas as compared to the rest of the City.

Both the Draft General Plan and this alternative are projected to result in increased automobile trips as a result of population growth. This increase in automobile trips to the planned transportation network would increase the number of roadway miles and the percentage of daily vehicle miles traveled at Level of Service E or F. This alternative may cause a shift in types of trips that occur in the four concentrated growth subareas as compared to the rest of the City, while the numbers and types of projected trips should not substantially change over the Draft General Plan. However, it is anticipated that implementation of this alternative would result in greater impacts in areas of concentrated growth and but reduced impacts in other areas compared to the Draft General Plan. Overall, the impacts associated with this alternative would be similar compared to the General Plan.

Visual Effects and Neighborhood Character

The implementation of the Concentrated Growth Alternative could result in increased visual and neighborhood character impacts in areas where growth is to be concentrated, and reduced impacts to other areas of the City, when compared to the Draft General Plan. In the areas of concentrated growth, visual effects and neighborhood character impacts would be reduced by adherence to existing policies, programs and project review procedures. In addition, this alternative would be subject to Draft General Plan policies that call for infill and redevelopment to be compatible with existing community character.

Existing City policies would continue to address potential impacts to topography, ground surface relief features and public views from designated open space areas, scenic highways or to any significant visual landmarks or scenic vistas (e.g., mountains, bays, rivers, and the ocean). Therefore, impacts to public views or scenic vistas would be similar when compared to the Draft General Plan. Overall, impacts to visual effects and neighborhood character with this alternative would be similar compared to the Draft General Plan.

Water Quality

The implementation of the Concentrated Growth Alternative would result in similar impacts associated with water quality than would occur under the Draft General Plan. Please see **Section 3.17** for a discussion of impacts associated with water quality under the Draft General Plan. Implementation of this alternative would result in similar water quality impacts compared to the Draft General Plan.

Global Warming

As previously discussed, the Concentrated Growth alternative would increase densities in areas that are served by some of the most substantial transit capital investments in the region. This alternative would likely serve to increase transit trips to and from these four subareas. In addition, the higher intensities within these areas would likely result in an increase in transit usage, and in walking and biking for internal, local trips. A reduction in vehicular trips would reduce GHG emissions associated with vehicle miles traveled. However, if transit service is scaled back in Neighborhood/Community Villages and Transit Corridors where growth is discouraged due to insufficient densities to make such service cost-effective, the GHG emissions reductions associated with reduced VMT in the concentrated growth areas may be offset by increased GHG emissions associated with increased VMT in areas where growth is discouraged. Furthermore, the Draft General Plan would focus growth into compact, mixed use walkable communities served by transit throughout the City, which would reduce the length and number of automobile trips and increase the number of transit, walking and biking trips throughout the City, including the areas targeted for concentrated growth under this alternative.

Under the Concentrated Growth Alternative, the reductions in the length and number of automobile trips and increases in the number of transit, walking and biking trips would only be anticipated to occur in the concentrated growth areas; reductions in the length and number of automobile trips and increases in the number of transit, walking and biking trips would not be anticipated to occur in the areas where growth is discouraged since such areas generally lack the densities and infrastructure to support increases in the number of alternative transportation trips. The level of GHG emissions associated with energy consumption in buildings under this alternative would be similar to the level under the Draft General Plan. This alternative would also have similar impacts related to GHG emissions from construction activities when compared to the Draft General Plan. The concentrated growth alternative would result in similar levels of transportation-related GHG emissions in the areas targeted for concentrated growth when compared to the transportation-related GHG emissions of these areas under the Draft General Plan, and higher levels of transportation-related GHG emissions in the Neighborhood/Community Villages and Transit Corridors where growth is discouraged and other areas of the City. Overall, the concentrated growth alternative is expected to result in greater global warming impacts than the Draft General Plan.

7.4 Environmentally Superior Alternative

An EIR is required to identify the environmentally superior alternative from among the range of reasonable alternatives that are evaluated. State CEQA Guidelines §15126.6(d)(2) states that if the environmentally superior alternative is the no project alternative, the EIR shall also identify an environmentally superior alternative from among the other alternatives. The environmental

effects of the ~~three~~-four alternatives analyzed in Section 7.3.2 are compared with the Draft General Plan on **Table 7.4-1** and summarized below. As the table shows, the Enhanced Sustainability Alternative would be environmentally superior to the Draft General Plan. But as explained previously, the City has undertaken actions to reduce the GHG emissions of future development under the Draft General Plan by expanding and strengthening the climate change policies of the Draft General Plan and MMRP, and identifying Action Plan measures to implement these policies. By taking these actions, the City has incorporated the principal environmental objectives of the Enhanced Sustainability Alternative into the Draft General Plan. Furthermore, the addition of Policy ME-G.5 to the Mobility Element to “implement parking strategies that are designed to help reduce the number and length of automobile trips ...” implements the principal environmental objective related to the Increased Parking Management Alternative.

**Table 7.4-1
Comparison of Impacts by Alternative to the Draft General Plan**

Impact	Proposed Project	No Project/ Existing Plans Alternative	Enhanced Sustainability Alternative	Increased Parking Management Alternative	Concentrated Growth Alternative
Agricultural Resources	Significant and unavoidable	Similar	Similar	Similar	Similar
Air Quality	Significant and unavoidable	Greater	Less	Less	Similar
Biological Resources	Significant and unavoidable	Similar	Similar	Similar	Similar
Geologic Conditions	Significant and unavoidable	Similar	Similar	Similar	Greater
Health and Safety	Significant and unavoidable	Similar	Similar	Similar	Greater
Historic Resources	Significant and unavoidable	Similar	Similar	Similar	Greater
Hydrology	Significant and unavoidable	Similar	Less	Similar	Similar
Land Use	Significant and unavoidable	Greater	Similar	Similar	Greater
Mineral Resources	Significant and unavoidable	Similar	Less	Similar	Similar
Noise	Significant and unavoidable	Similar	Similar	Similar	Similar
Paleontologic al Resources	Significant and unavoidable	Similar	Similar	Similar	Similar
Population and Housing	Significant and unavoidable	Similar	Similar	Similar	Less
Public Services and Facilities	Significant and unavoidable	Similar	Similar	Similar	Similar
Public Utilities	Significant and unavoidable	Similar	Less	Similar	Similar
Traffic	Significant and unavoidable	Greater	Similar	Less	Similar
Visual Effects and Neighborhood Character	Significant and unavoidable	Similar	Similar	Similar	Similar
Water Quality	Significant and unavoidable	Similar	Less	Similar	Similar
<u>Global Warming</u>	<u>Significant and unavoidable</u>	<u>Greater</u>	<u>Less</u>	<u>Less</u>	<u>Greater</u>

~~As the table shows, the Enhanced Sustainability alternative would be environmentally superior to the Draft General Plan.~~

8.0 EIR CERTIFICATION

8.1 EIR Preparation

This EIR was prepared under the direction of the Environmental Review Manager of the City of San Diego's Development Services Department. It reflects the independent judgment of the City of San Diego as lead agency under CEQA. The following persons participated in the preparation of this document:

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Mitigation Monitoring and Reporting Program

for

**City of San Diego General Plan
Final Program EIR**

Lead Agency:

**City of San Diego
Development Services Department
1222 First Avenue
San Diego, California 92101**

September 28, 2007

City of San Diego General Plan Mitigation Monitoring and Reporting Program

The City of San Diego adopts this Mitigation Monitoring and Reporting Program (MMRP) in accordance with Public Resources Code (PRC) Section 21081.6 and Section 15097 of the California Environmental Quality Act (CEQA) Guidelines. The purpose of the MMRP is to ensure that the updated San Diego General Plan (the Project), which is the subject of the Final Program Environmental Impact Report (PEIR), complies with all applicable environmental mitigation requirements. Mitigation Framework measures for the Project will be adopted by the City of San Diego, in conjunction with the certification of the PEIR. Those Mitigation Framework measures have been integrated into this MMRP. Within this document, approved mitigation framework measures are organized and referenced by subject category and include those for: (1) agricultural resources; (2) air quality; (3) biological resources; (4) geologic conditions; (5) health and safety; (6) historical resources; (7) hydrology; (8) land use; (9) mineral resources; (10) noise; (11) paleontological resources; (12) population and housing; (13) public facilities; (14) public utilities; (15) traffic; (16) visual effects/neighborhood character; (17) water quality; and (18) global warming.

The Mitigation Framework described in the PEIR and summarized here provides a broad purpose and overview of actions that will occur in order to reduce identified environmental impacts. The Framework is intended to provide guidance for mitigation measures to be identified for each specific future project subject to CEQA within the City. Because specific locations and intensities of development are not known at this time, it is infeasible at the General Plan level to develop mitigation measures which would guarantee reduction of these specific, unknown impacts to a level less than significant; therefore, the Mitigation Framework is provided at the program EIR level, while concurrently serving as the basis for more specific refinement of future mitigation measures to be developed through the General Plan Action Plan and project-level CEQA review.

The MMRP will remain available for public review during the compliance period. Mitigation Framework measures applicable to the Project include avoiding certain impacts altogether, minimizing impacts by limiting the degree or magnitude of the action and its implementation, rectifying impacts by repairing, rehabilitating, or restoring the affected environment, and/or reducing or eliminating impacts over time by preservation and maintenance operations during the life of the Project.

The MMRP will be used in preparing the Annual Report to the City Council on the status of the City's progress in implementing the General Plan, as described in Section 65400 of the California Government Code. Because many of the individual General Plan policies identified in the MMRP act as mitigation for significant environmental impacts resulting from development pursuant to the General Plan, the Annual Report can also provide a means of monitoring the application of the mitigation framework, policies and Action Plan measures.

Public Resources Code Section 21081.6 requires the Lead Agency, for each project that is subject to the California Environmental Quality Act (CEQA), to monitor performance of the mitigation measures included in any environmental document to ensure that mitigation does, in fact, take place. The City of San Diego is the designated lead agency for the Mitigation Monitoring and Reporting Program. The City is responsible for review of all monitoring reports, enforcement actions, and document disposition.

The General Plan Action Plan is currently being developed by the City and will identify a comprehensive work program of refined mitigation measures such as new or amended regulations, programs and incentives to achieve consistency with General Plan policies. An MMRP uses General Plan policies as a

bridge between the mitigation framework and the General Plan Action Plan. While the General Plan Action Plan is being prepared, the General Plan policies cited in the MMRP will apply.

Implementation of the General Plan policies would provide mitigation at the program level. At the project level, adherence to all applicable federal, state and local regulations as well as project-specific environmental mitigation requirements would be required. Some examples of the City's currently required project-specific mitigation can be found in the Biological Resources, Historical Resources, and Paleontological Resources sections of the PEIR.

Several agencies, organizations, and interested persons submitted comments on the Draft EIR during the public review period. In response to comments received, certain revisions were made in the EIR. These revisions are incorporated into the following Mitigation Monitoring and Reporting Program.

San Diego General Plan PEIR Mitigation Monitoring and Reporting Program

Impact Area	Mitigation Framework
Agricultural Resources	<p>Mitigation for impacts to agricultural resources would occur at the project level and may involve preservation of important agricultural lands or buffers between new uses and existing adjacent agricultural uses. See the following Draft General Plan policies:</p> <ul style="list-style-type: none"> CE-L.1 Manage agricultural activity to minimize soil erosion and minimize the release of contaminants into surface and groundwater resources. CE-L.2 Limit retail activity in agriculturally-designated areas to uses that are reasonably related to agriculture (e.g., sale of locally grown farm products). CE-L.3 Encourage agricultural operations such as community farms and gardens (especially on City-leased lands) to provide for educational experiences which demonstrate the history, importance and value of agricultural operations. CE-L.4 Continue water reclamation research programs to develop realistic methods of providing inexpensive means of leaching soils, irrigating crops and preventing salt water intrusion. CE-L.5 Integrate agriculture and sustainability principles that promote clean air, water, healthy soils, and healthy habitats and ecosystems. <ul style="list-style-type: none"> a. Encourage sustainable agricultural and water quality best management practices, such as tillage, use of grass filter strips, runoff detention basins, and organic farming, on all private land and require BMPs on new or renewed City land leased for agricultural purposes. Provide the minimum amount of flood control/channelization. b. Encourage sustainable agricultural operations, especially on City-leased lands, to offer more sustainable, local food choices. CE-L.6 Provide mechanisms to permit private land owners of prime agricultural lands to take advantage of the Williamson Act. CE-L.7 Balance the economic benefits provided by agricultural uses with the competing water resource, biological and cultural resource management and recreation priorities.
Air Quality	<p>For projects that may exceed daily construction emissions established by the City of San Diego, Best Available Control Measures (BACMs) would be incorporated to reduce construction emissions to below daily emission standards established by the City.</p>

San Diego General Plan PEIR Mitigation Monitoring and Reporting Program

Impact Area	Mitigation Framework
	<p>Development that could significantly impact air quality, either individually or cumulatively, would receive entitlement only if conditioned with all reasonable mitigation to avoid, minimize, or offset the impact. As a part of this process, future projects may be required to buffer sensitive receptors from air pollution sources through the use of landscaping, open space, and other separation techniques. See the following Draft General Plan policies:</p> <p>CE-F.1. Develop and adopt a fuel efficiency policy to reduce fossil fuel use by City departments, and support community outreach efforts to achieve similar goals in the community.</p> <p>CE-F.2. Continue to upgrade energy conservation in City buildings and support community outreach efforts to achieve similar goals in the community.</p> <p>CE-F.3. Continue to use methane as an energy source from inactive and closed landfills.</p> <p>CE-F.4. Preserve and plant trees, and vegetation that are consistent with habitat and water conservation policies and that absorb carbon dioxide and pollutants.</p> <p>CE-F.5. Promote technological innovations to help reduce automobile, truck, and other motorized equipment emissions.</p> <p>CE-F.6. Encourage and where feasible provide incentives for the use of alternatives to single-occupancy vehicle use, including using public transit, carpooling, vanpooling, teleworking, bicycling, and walking. Continue to implement programs to provide City employees with incentives for the use of alternatives to single-occupancy vehicles.</p> <p>CE-F.7. Influence the development of state, federal, and local actions to increase the use of alternative fuels.</p>
Biological Resources	<p>Development projects must be designed to minimize impacts to natural habitats consistent with City plans and ordinances. See the following Draft General Plan policies:</p> <p>CE-G.1. Preserve natural habitats pursuant to the MSCP, preserve rare plants and animals to the maximum extent practicable, and manage all City-owned native habitats to ensure their long-term biological viability.</p> <ol style="list-style-type: none"> a. Educate the public about the impacts invasive plant species have on open space. b. Remove, avoid, or discourage the planting of invasive plant species. c. Pursue funding for removal of established populations of invasive species within open space. <p>CE-G.2. Prioritize, fund, acquire, and manage open spaces that preserve important ecological resources and provide habitat connectivity.</p> <p>CE-G.3. 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>CE-G.4. Consider important ecological resources when determining where to apply floodplain regulations and development guidelines.</p> <p>CE-G.5. Promote aquatic biodiversity and habitat recovery by reducing hydrological alterations, such as grading a stream channel.</p> <p>Biological mitigation for upland impacts must be in accordance with the City’s Biology Guidelines, Table 3.3.4.</p>

San Diego General Plan PEIR Mitigation Monitoring and Reporting Program

Impact Area	Mitigation Framework
	Development projects must provide for continued wildlife movement through wildlife corridors as identified in the MSCP Subarea Plan or as identified through project-level analysis. Mitigation may include, but is not limited to, provision of appropriately-sized bridges, culverts, or other openings to allow wildlife movement.
	<p>For all projects adjacent to the MHPA, development must conform to all applicable MHPA Land Use Adjacency Guidelines (Section 1.4.3) of the MSCP Subarea Plan. See the following Draft General Plan policy:</p> <p>CE-G.1. Preserve natural habitats pursuant to the MSCP, preserve rare plants and animals to the maximum extent practicable, and manage all City-owned native habitats to ensure their long-term biological viability.</p> <ol style="list-style-type: none"> a. Educate the public about the impacts invasive plant species have on open space. b. Remove, avoid, or discourage the planting of invasive plant species. c. Pursue funding for removal of established populations of invasive species within open space.
	Schedule the construction of projects to avoid impacts to wildlife (e.g., avoid the breeding season for sensitive species) to the extent practicable.
	Future projects must implement appropriate noise attenuation measures as it affects sensitive avian species, post construction, to reduce noise levels at the edge of occupied habitat.
	<p>Future projects must protect wetlands and vernal pools to the extent feasible. See the following Draft General Plan policies:</p> <p>CE-C.1. Protect, preserve, restore and enhance important coastal wetlands and habitat (tide pools, lagoons and marine canyons) for conservation, research, and limited recreational purposes.</p> <p>CE-C.2. Control sedimentation entering coastal lagoons and waters from upstream urbanization using a watershed management approach that is integrated into local community and land use plans (see also, Land Use Element, Policy LU-E-1).</p> <p>CE-C.3. Minimize alterations of cliffs and shorelines to limit downstream erosion and to ensure that sand flow naturally replenishes beaches.</p> <p>CE-C.4. Manage wetland areas as described in Section H, Wetlands, for natural flood control and preservation of landforms.</p> <p>CE-C.5. Limit the use of beaches and shorelines to appropriate coastal dependent and ocean-oriented recreational/educational uses as identified in local coastal/community plans.</p> <p>CE-H.1. Use a watershed planning approach to preserve and enhance wetlands.</p> <p>CE-H.2. Facilitate public-private partnerships that improve private, federal, state and local coordination through removal of jurisdictional barriers that limit effective wetland management.</p> <p>CE-H.3. Seek state and federal legislation and funding that supports efforts to research, classify, and map wetlands including vernal pools and their functions, and improve restoration and mitigation procedures.</p> <p>CE-H.4. Support the long-term monitoring of restoration and mitigation efforts to track and evaluate changes in wetland acreage, functions, and values.</p> <p>CE-H.5. Support research and demonstration projects that use created wetlands to</p>

San Diego General Plan PEIR Mitigation Monitoring and Reporting Program

Impact Area	Mitigation Framework
	<p>help cleanse urban and storm water runoff, where not detrimental to natural upland and wetland habitats.</p> <p>CE-H.6. Support educational and technical assistance programs, for both planning and development professionals, and the general public, on wetlands protection in the land use planning and development process.</p> <p>CE-H.7. Encourage site planning that maximizes the potential biological, historic, hydrological and land use benefits of wetlands.</p> <p>CE-H.8. Implement a “no net loss” approach to wetlands conservation in accordance with state and federal regulations.</p> <p>CE-H.9. Consider public health, access, and safety, including pest and vector control, on wetland creation and enhancement sites.</p> <hr/> <p>Future projects must limit the disturbance to native vegetation to the extent practicable. See the following Draft General Plan policies:</p> <p>CE-G.1. Preserve natural habitats pursuant to the MSCP, preserve rare plants and animals to the maximum extent practicable, and manage all City-owned native habitats to ensure their long-term biological viability.</p> <ol style="list-style-type: none"> a. Educate the public about the impacts invasive plant species have on open space. b. Remove, avoid, or discourage the planting of invasive plant species. c. Pursue funding for removal of established populations of invasive species within open space. <p>CE-G.4. Consider important ecological resources when determining where to apply floodplain regulations and development guidelines.</p> <p>CE-G.5. Promote aquatic biodiversity and habitat recovery by reducing hydrological alterations, such as grading a stream channel.</p>

San Diego General Plan PEIR Mitigation Monitoring and Reporting Program

Impact Area	Mitigation Framework
<p>Geologic Conditions</p>	<p>The City may require general measures be implemented to preclude impacts, including:</p> <ul style="list-style-type: none"> • Preparation of soil and geologic conditions surveys. • Implementation of state seismic and structural design requirements • Grading techniques that reduce landslide and erosion hazard impacts. <p>See the following Draft General Plan policies:</p> <p>PF-Q.1. Protect public health and safety through the application of effective seismic, geologic and structural considerations.</p> <ol style="list-style-type: none"> 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. b. Maintain updated citywide maps showing faults, geologic hazards, and land use capabilities, and related studies used to determine suitable land uses. 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. d. Utilize the findings of a beach and bluff erosion survey to determine the appropriate rate and amount of coastline modification permissible in the City. e. Coordinate with other jurisdictions to establish and maintain a geologic “data bank” for the San Diego area. f. Regularly review local lifeline utility systems to ascertain their vulnerability to disruption caused by seismic or geologic hazards and implement measures to reduce any vulnerability. g. Adhere to state laws pertaining to seismic and geologic hazards. <p>PF-Q.2. Maintain or improve integrity of structures to protect residents and preserve communities.</p> <ol style="list-style-type: none"> a. Abate structures that present seismic or structural hazards with consideration of the desirability of preserving historical and unique structures and their architectural appendages, special geologic and soils hazards, and the socio-economic consequences of the attendant relocation and housing programs. b. Continue to consult with qualified geologists and seismologists to review geologic and seismic studies submitted to the City as project requirements. c. Support legislation that would empower local governing bodies to require structural inspections for all existing pre-Riley Act (1933) buildings, and any necessary remedial work to be completed within a reasonable time.
<p>Health and Safety</p>	<p>Future projects locating non-residential employment uses in proximity to residential development or vice versa must be sited and designed in a manner that reduces or avoids potential health and safety incompatibility impacts. Prior to the approval of any entitlement, the City would evaluate the project in light of the Conversion/Collocation Suitability Factors</p>

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Impact Area	Mitigation Framework
	<p>(located in Appendix C of the Draft General Plan) would be used to analyze compatibility of site specific proposals. See the following Draft General Plan policies:</p> <p>EP-A.20. Meet the following requirements in all industrial areas as a part of the discretionary review of projects involving residential, commercial, institutional, mixed-use, public assembly, or other sensitive receptor land uses:</p> <ul style="list-style-type: none"> • Analyze the Collocation/Conversion Suitability Factors in Appendix C, EP-2. • Incorporate pedestrian design elements including pedestrian-oriented street and sidewalk connections to adjacent properties, activity centers, and transit. • Require payment of the conversion/collocation project’s fair share of community facilities required to serve the project (at the time of occupancy). <p>EP-A.21. For discretionary review of projects involving residential uses, require payment of the conversion/collocation project’s fair share of community facilities required to serve the additional units at the time of occupancy.</p>
	<p>Future projects located in known High Fire Hazard Areas must be sited and designed to minimize impacts to fire. Prior to approval of any entitlement for a future project, the City would ensure that any impacts from wildfire or landslides will be reduced and, if necessary, mitigated in accordance with the requirements of the City of San Diego. See the following Draft General Plan policies:</p> <p>PF-D.1. 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. • 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 (ALS) capability at emergency medical incidents, where this service is provided by the City, should be within eight minutes 90 percent of the time. <p>PF-D.2. Deploy to advance life support emergency responses 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 (AED) should be within four minutes to 90 percent of the incidents.

San Diego General Plan PEIR Mitigation Monitoring and Reporting Program

Impact Area	Mitigation Framework
	<ul style="list-style-type: none"> • 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. <p>PF-D.3. Adopt, monitor, and maintain service delivery objectives based on time standards for all fire, rescue, emergency response, and lifeguard services.</p> <p>PF-D.4. Provide a minimum 3/4-acre fire station site area and allow room for station expansion.</p> <ol style="list-style-type: none"> a. Consider the inclusion of fire station facilities in development projects as an alternative method to the acreage guideline. b. Acquire adjacent sites that would allow for station expansion as opportunities allow. c. Gain greater utility of fire facilities by pursuing joint use opportunities such as community meeting rooms or collocating with police, libraries, or parks where appropriate. <p>PF-D.5. Maintain service levels to meet the demands of continued growth and development, tourism, and other events requiring fire-rescue services.</p> <ol style="list-style-type: none"> 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>PF-D.6. Provide public safety related facilities and services to assure that adequate levels of service are provided to existing and future development.</p> <p>PF-D.7. Evaluate fire-rescue infrastructure for adherence to public safety standards and sustainable development policies (see also Conservation Element, Section A).</p> <p>PF-D.8. Invest in technological advances that enhance the City’s ability to deliver emergency and fire-rescue services more efficiently and cost-effectively.</p> <p>PF-D.9. Provide and maintain a training facility and program to ensure fire-rescue personnel are properly trained.</p> <p>PF-D.10. Buffer or incorporate design elements to minimize impacts from fire stations to adjacent sensitive land uses, when feasible.</p>
	<p>Future discretionary projects located in an airport influence area will be submitted to the ALUC for consistency determinations with the adopted ALUCPs up until the time when the ALUC adopts the updated ALUCPs. After the ALUC adoption of the updated ALUCPs, the City will submit future projects located in an airport influence area until the ALUC determines that the City’s affected land use plans, development regulations, and zoning ordinances are consistent with the ALUCPs. Amendments to land use plans, development regulations, and zoning ordinances that are within an airport influence area must be submitted the ALUC prior to adoption. See the following Draft General Plan policies:</p> <p>LU-G.1. Work with the ALUC to develop policies that are consistent with the state and federal regulations and guidelines, that balance airport land use compatibility goals with other citywide and regional goals, and that emphasize the major airport land use compatibility factors.</p> <p>LU-G.2. Submit all amendments and updates to the General Plan, community plans, specific plans, airport plans, development regulations and zoning</p>

San Diego General Plan PEIR Mitigation Monitoring and Reporting Program

Impact Area	Mitigation Framework
	<p>ordinances affected by an airport influence area to the ALUC to ensure that they are consistent with the Airport Land Use Compatibility Plan or have the City Council take steps to overrule the ALUC.</p> <p>LU-G.3. Submit the General Plan, community plans, and specific plans 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 or have the City Council take steps to overrule the ALUC.</p> <p>LU-G.4. 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>LU-G.5. Implement the height standards used by the FAA as defined by Code of Federal Regulations Title 14, Part 77 through development regulations and zoning ordinances.</p> <p>LU-G.6. Require that all proposed development projects (ministerial and discretionary actions) notify the FAA in areas where the proposed development meets the notification criteria as defined by Code of Federal Regulation Title 14, Part 77.</p> <ol style="list-style-type: none"> a. Require that all proposed development projects that are subject to FAA notification requirement provide documentation that FAA has determined that the project is not a Hazard to Air Navigation prior to project approval. b. Require that the Planning Commission and City Council approve any proposed development that the FAA has determined to be a Hazard to Air Navigation once state and ALUC requirements are satisfied. <p>LU-G.7. Evaluate the siting and expansions of airports and heliports on the basis of aviation and land use need and the impacts on surrounding land uses.</p>
Historical Resources	<p>Specific mitigation at the Program EIR level is not available. However, measures incorporated into future projects can reduce potential impacts to historical resources. Steps are taken to identify and mitigate significant impacts to historical resources, as part of the discretionary review of development projects. See the following Draft General Plan policies:</p> <p>HP-A.1. Strengthen historic preservation planning.</p> <ol style="list-style-type: none"> a. Maintain Certified Local Government (CLG) status ensuring San Diego’s direct participation in federal and state historic preservation programs. b. Utilize benefits of the CLG program including grant funding available from the California Office of Historic Preservation. c. Update the Comprehensive Historic Preservation Plan. The plan is intended to guide, with specificity, historic preservation efforts in future years, including implementation measures, inventories, incentives, education and regulations. d. Participate in regional efforts to strengthen historic preservation planning. <p>HP-A.2. Fully integrate the consideration of historical and cultural resources in the larger land use planning process.</p> <ol style="list-style-type: none"> a. Promote early conflict resolution between the preservation of

San Diego General Plan PEIR Mitigation Monitoring and Reporting Program

Impact Area	Mitigation Framework
	<p>historical resources and alternative land uses.</p> <ul style="list-style-type: none"> b. Encourage the consideration of historical and cultural resources early in the development review process by promoting the preliminary review process and early consultation with homeowners, land developers, Native Americans, and the building industry. c. Include historic preservation concepts and identification of historic neighborhoods and non-residential historical resources in the community plan update process. d. Conservation areas that are identified at the community plan level, based on historical resources surveys, may be used as an urban design tool to complement community character. (see also Urban Design Element, Policy UD-A.7.) e. Make the results of historical and cultural resources planning efforts available to planning agencies, the public and other interested parties to the extent legally permissible. <p>HP-A-3. Foster government-to-government relationships with the Kumeyaay/Diegueño tribes of San Diego.</p> <ul style="list-style-type: none"> a. Regularly meet with local Tribal governments to discuss issues of mutual concern. b. Formally consult with identified California Native American tribes prior to the adoption or amendment of the General Plan or specific plan or the designation of open space. c. Maintain confidentiality concerning locations of traditional cultural places that are identified through the consultation process and otherwise. d. Support Tribal governments holding conservation easements over land voluntarily set aside for the protection of cultural places. <p>HP-A.4. Actively pursue a program to identify, document and evaluate the historical and cultural resources in the City of San Diego.</p> <ul style="list-style-type: none"> a. Develop context statements specific to areas being surveyed. b. Complete and regularly update a comprehensive citywide inventory of historical and cultural resources in conformance with state standards and procedures. c. Require that archaeological investigations be guided by appropriate research designs and analytical approaches to allow recovery of important prehistoric and historic information. d. Require the permanent curation of archaeological artifact collections and associated research materials, including collections held by the City. Support the permanent archiving of primary historical records and documents now in public institutions. e. Include Native American monitors during all phases of the investigation of archaeological resources including survey, testing, evaluation, data recovery and construction monitoring. f. Treat with respect and dignity any human remains discovered during implementation of public and private projects within the City and fully comply with the California Native American Graves Protection and Repatriation Act and other appropriate laws. <p>HP-A.5. Designate and preserve significant historical and cultural resources for current and future generations.</p>

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Impact Area	Mitigation Framework
	<ul style="list-style-type: none"> a. Designate important historical resources using the City's adopted designation criteria, State Register criteria, and National Register criteria. b. Establish historical districts where concentrations of buildings, structures, sites, landscapes, and objects are identified. Adopt guidelines when necessary to guide preservation and rehabilitation of the overall district character and significance and apply the U.S. Secretary of the Interior's Standards for the Treatment of Historic Properties for review of alterations and new construction in designated historical districts. c. Protect and preserve historic sidewalk stamps, street signs, lampposts, street trees and other hardscape and landscape elements that contribute to the historic character of a neighborhood. 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. e. Encourage continued use and adaptive reuse of designated historical resources through application of the U.S. Secretary of the Interior's Standards and Guidelines for rehabilitation, reconstruction, and restoration. f. Require that all City-owned designated historical resources be maintained in a manner that is consistent with the U.S. Secretary of the Interior's Standards for the Treatment of Historic Properties. <p>HP-B.1. Foster greater public participation and education in historical and cultural resources.</p> <ul style="list-style-type: none"> a. Encourage public attendance at monthly Historical Resources Board meetings through increased notification of agenda items on the City's website. b. Encourage the participation of the City's rich diversity of ethnic groups in efforts to preserve historical and cultural resources through outreach to historical societies, interviews to document oral histories, and inclusion of ethnic resources on the City's Register of Designated Historical Resources. c. Engage the public when creating "context statements" by adopting an oral history component of historical survey work. d. Participate in National Historic Preservation Week and California Archaeology Month. Each year in May recognize those individuals, groups or businesses that have made a significant contribution to the preservation, protection or restoration of historical or cultural resources. e. Foster educational opportunities using designated historical and cultural resources, including placement of plaques as a way to identify important historical resources throughout the City. f. Encourage the involvement of educational institutions in preservation programs and activities. g. Encourage the use of local history themes in some public art projects. h. Encourage active community involvement in preservation efforts through resource sponsorship programs. <p>HP-B.2. Promote the maintenance, restoration and rehabilitation of historical</p>

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	<p>resources through a variety of financial and development incentives. Continue to use existing programs and develop new approaches as needed. Encourage continued private ownership and utilization of historic structures through a variety of incentives.</p> <ol style="list-style-type: none"> a. Encourage owners of historical resources to utilize federal incentives including Federal Rehabilitation Tax Credits, façade and conservation easements and others. b. Encourage preservation, maintenance, rehabilitation and restoration of designated historical resources through use of available incentives offered by the state of California for achieving this goal. These incentives include the Mills Act, the California Cultural and Historical Endowment, and others. c. Create incentives to encourage the protection and preservation of important archaeological sites in situ on privately-owned property. d. Use the flexibility provided in the California State Historical Building Code Title 24 in meeting code requirements for historically-designated buildings. e. Encourage the use of Transfer of Development Rights to preserve historical and cultural resources in situ, particularly in areas zoned for high-density development. f. Take advantage of the Conditional Use Permit (CUP) process for historical resources, to gain flexibility in the application of some development regulations. g. Foster preservation and adaptive reuse of designated historical buildings and structures by allowing retention of non-conforming setbacks without requiring a variance or hardship finding. The use of a Neighborhood Development Permit with a finding that the proposed reuse does not adversely affect the community plan or General Plan that calls for preservation would be beneficial in this regard. h. Provide architectural assistance service to help owners design rehabilitation and/or adaptive reuse plans, or feasibility studies for historically-designated buildings, structures and objects. Maintain the City’s current façade improvement program for historic commercial properties. i. Continue to provide design assistance for owners of historical resources through the Historical Resources Board. <p>HP-B.3. Develop a historic preservation sponsorship program.</p> <ol style="list-style-type: none"> a. Create a historic preservation fund that provides a monetary source for local preservation incentives such as an architectural assistance program and archaeological site protection plan. The fund may be supported through grants, private or public donations, or other sources. b. Create a “receiver site” program that provides relocation sites for historical resources (buildings, structures or objects) that cannot be preserved on site. Receiver sites should be located within the community in which the resource was originally located and should maintain a context and setting comparable to the original location. This method of preservation should be limited and used when other on-site preservation techniques are found not to be feasible. c. Establish an “adopt a resource” program that encourages the public

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	<p>and local businesses to become involved in the protection and preservation of historical and cultural resources by sponsoring preservation of individual properties, which may include archaeological sites to the extent legally permissible.</p> <p>d. Create a sponsorship program to encourage the public and local businesses to become involved in curation of existing archaeological artifact collections that have no current funding mechanism.</p> <p>HP-B.4. Increase opportunities for cultural heritage tourism. Additional discussion and policies can be found in the Economic Prosperity Element, Section I.</p> <p>a. Collaborate with other public, private and non-profit entities to create a sustainable cultural heritage tourism program within the overall travel industry.</p> <p>b. Promote the history of San Diego and the many designated historical buildings, structures, districts, and landscapes to attract cultural heritage travelers.</p> <p>c. Focus the development of cultural heritage programs on quality and authenticity.</p> <p>UD-A.7. Respect the context of historic streets, landmarks, and areas that give a community a sense of place or history. A survey may be done to identify "conservation areas" that retain original community character in sufficient quantity and quality but typically do not meet designation criteria as an individual historical resource or as a contributor to a historical district.</p> <p>a. Create guidelines in community plans to be used for new development, so that a neighborhood's historic character is complemented within the conservation areas where appropriate. (See also Historical Preservation Element, Policy HP-A.2.)</p> <p>b. Review the redevelopment of property within conservation areas to maintain important aspects of the surviving community character that have been identified as characteristics of a neighborhood that could be preserved.</p>
Hydrology	<p>Future projects must be sited and designed to minimize impacts to absorption rates, drainage patterns, and rates of surface runoff in accordance with City requirements and other appropriate agencies including the San Diego Regional Water Quality Control Board. Such siting and design may include implementation of the mitigation framework measures identified in Section 3.17.4 (see Water Quality section). See the following Draft General Plan policies:</p> <p>CE-E.2. 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>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.</p> <p>c. Reduce the amount of impervious surfaces through selection of</p>

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	<p>materials, site planning, and street design where possible.</p> <ul style="list-style-type: none"> 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 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. <p>CE-E.3. 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>CE-E.4. Continue to participate in the development and implementation of Watershed Management Plans for water quality and habitat protection.</p>
	<p>The generalized Hydrology and Water Quality mitigation measures provided in the EIR may be updated, expanded and refined when applied to specific future projects based on project-specific design and changes in existing conditions, and local, state and federal laws.</p>
Land Use	<p>A Community Plan update program is being established to help ensure that the City’s community plans are consistent with the General Plan, and that they serve as an effective means to implement citywide environmental policies and address policies related to Airport Land Use Plans. See the following Draft General Plan policies:</p> <ul style="list-style-type: none"> LU-A.1. Designate a hierarchy of village sites for citywide implementation. <ul style="list-style-type: none"> a. Affirm the position of Downtown San Diego as the regional hub by maintaining and enhancing its role as the major business center in the region and encouraging its continued development as a major urban residential center with the largest concentration of high-density multifamily housing in the region. b. Encourage further intensification of employment uses throughout Subregional Employment Districts. Where appropriate, consider collocating medium- to high- density residential uses with employment uses (see also Economic Prosperity Element). c. Designate Neighborhood, Community, and Urban Village Centers, as appropriate, in community plans throughout the City, where consistent with public facilities adequacy and other goals of the General Plan. d. Revitalize transit corridors through the application of plan designations and zoning that permits a higher intensity of mixed-use development. Include some combination of: residential above commercial development, employment uses, commercial uses, and higher density-residential development. LU-A.2. Identify sites suitable for mixed-use village development that will complement the existing community fabric or help achieve desired

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	<p>community character, with input from recognized community planning groups and the general public.</p> <p>LU-A.3. Identify and evaluate potential village sites considering the following physical characteristics:</p> <ul style="list-style-type: none"> • Shopping centers, districts, or corridors that could be enhanced or expanded; • Community or mixed-use centers that may have adjacent existing or planned residential neighborhoods; • Vacant or underutilized sites that are outside of open space or community-plan designated single-family residential areas; • Areas that have significant remaining development capacity based upon the adopted community plan; and • Areas that are not subject to major development limitations due to topographic, environmental, or other physical constraints. <p>LU-A.4. Locate village sites where they can be served by existing or planned public facilities and services, including transit services.</p> <p>LU-A.5. Require environmental review and additional study for potential village locations, with input from recognized community planning groups and the general public, to determine if these locations are appropriate for mixed-use development and village design.</p> <p>LU-A.6. Recognize that various villages may serve specific functions in the community and City; some villages may have an employment orientation, while others may be major shopping destinations, or primarily residential in nature.</p> <p>LU-A.7. Determine the appropriate mix and densities/intensities of village land uses at the community plan level, or at the project level when adequate direction is not provided in the community plan.</p> <ol style="list-style-type: none"> a. Consider the role of the village in the City and region; surrounding neighborhood uses; uses that are lacking in the community; community character and preferences; and balanced community goals (see also Section H). b. Achieve transit-supportive density and design, where such density can be adequately served by public facilities and services (see also Mobility Element, Policy ME-B.9). <p>LU-A.8. Determine at the community plan level where commercial uses should be intensified within villages and other areas served by transit, and where commercial uses should be limited or converted to other uses.</p> <p>LU-A.9. Integrate public gathering spaces and civic uses into village design (see also Urban Design Element, Policies UD-C.5 and UD-E.1).</p> <p>LU-A.10. Design transit corridor infill projects along transit corridors to enhance or maintain a “Main Street” character through attention to site and building design, land use mix, housing opportunities, and streetscape improvements.</p> <p>LU-A.11. Design and evaluate mixed-use village projects based on the design goals and policies contained in the Urban Design Element.</p> <p>LU-C.1. Establish each community plan as an essential component of the Land Use Element with clear links to General Plan goals and policies.</p> <ol style="list-style-type: none"> a. Build upon and/or refine citywide policies as needed to reflect

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	<p>community and neighborhood-specific issues.</p> <ul style="list-style-type: none"> b. Rely on community plans for site-specific land use and density designations and recommendations c. Maintain consistency between community plans and the General Plan, as together they represent the City’s comprehensive plan. In the event of an inconsistency between the General Plan and a community plan, action must be taken to either: 1) amend the community plan, or 2) amend the General Plan in a manner that is consistent with the General Plan’s Guiding Principles. <p>LU-C.2. Prepare community plans to address aspects of development that are specific to the community, including: distribution and arrangement of land uses (both public and private); the local street and transit network; location, prioritization, and the provision of public facilities; community and site-specific urban design guidelines; urban design guidelines addressing the public realm; community and site-specific recommendations to preserve and enhance natural and cultural resources; and coastal resource policies (when within the Coastal Zone).</p> <ul style="list-style-type: none"> a. Apply land use designations at the parcel level to guide development within a community. <ul style="list-style-type: none"> 1. Include a variety of residential densities; including mixed use, to provide locational choices and affordable housing opportunities. 2. Designate open space and evaluate publicly-owned land for future dedication and privately-owned lands for acquisition or protection through easements. 3. Evaluate employment land and designate according to their role in the community and in the region. b. Draft each community plan with achievable goals, and avoid creating a plan that is a “wish list” or a vague view of the future. c. Provide plan policies and land use maps that are detailed enough to provide the foundation for fair and predictable land use planning. d. Provide detailed, site-specific recommendations for village sites. e. Recommend appropriate implementation mechanisms to efficiently implement General Plan and community plan recommendations. f. Establish a mobility network to effectively move workers and residents. g. Update the applicable public facilities financing plan to assure that public facility demands are adjusted to account for changes in future land use and for updated costs associated with new public facilities. <p>LU-C.3. Maintain or increase the City’s supply of land designated for various residential densities as community plans are prepared, updated, or amended.</p> <p>LU-C.4. Ensure efficient use of remaining land available for residential development and redevelopment by requiring that new development meet the density minimums of applicable plan designations.</p> <p>LU-C.5. Draft, update and adopt community plans with a schedule that ensures that a community’s land use policies are up-to-date and relevant, and that implementation can be achieved.</p> <ul style="list-style-type: none"> a. Utilize the recognized community planning group meeting as the primary vehicle to ensure public participation.

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	<ul style="list-style-type: none"> b. Include all community residents, property owners, business owners, civic groups, agencies, and City departments who wish to participate in both land use and public facilities planning and implementing the community vision. c. Concurrently update plans of contiguous planning areas in order to comprehensively address common opportunities such as open space systems or provision of public facilities and common constraints such as traffic congestion. <p>LU-C.6 Review existing and apply new zoning at the time of a community plan update to assure that revised land use designations or newly-applicable policies can be implemented through appropriate zones and development regulations, (see also Section F).</p>
	<p>Existing and future regulations will also provide development standards aimed at reducing land use incompatibilities. See the following Draft General Plan policies:</p> <p>LU-A.6. Recognize that various villages may serve specific functions in the community and City; some villages may have an employment orientation, while others may be major shopping destinations, or primarily residential in nature.</p> <p>LU-A.7. Determine the appropriate mix and densities/intensities of village land uses at the community plan level, or at the project level when adequate direction is not provided in the community plan.</p> <ul style="list-style-type: none"> a. Consider the role of the village in the City and region; surrounding neighborhood uses; uses that are lacking in the community; community character and preferences; and balanced community goals (see also Section H). b. Achieve transit-supportive density and design, where such density can be adequately served by public facilities and services (see also Mobility Element, Policy ME-B.9). <p>LU-A.8. Determine at the community plan level where commercial uses should be intensified within villages and other areas served by transit, and where commercial uses should be limited or converted to other uses.</p> <p>LU-A.9. Integrate public gathering spaces and civic uses into village design (see also Urban Design Element, Policies UD-C.5 and UD-E.1).</p> <p>LU-A.10. Design transit corridor infill projects along transit corridors to enhance or maintain a “Main Street” character through attention to site and building design, land use mix, housing opportunities, and streetscape improvements.</p> <hr/> <p>Future projects must be reviewed to ensure that they do not conflict with the General Plan and applicable community plans resulting in a physical impact on the environment. Prior to the approval of any entitlement, the City would evaluate whether proposed projects implement specified land use, density/intensity, design guidelines, Airport Land Use Compatibility Plans, and other General Plan and community plan policies including open space preservation, community identity, mobility, and the timing, phasing, and provision of public facilities. See the following Draft General Plan policies:</p> <p>LU-D.1. Require a General Plan and community plan amendment for proposals that involve: a change in community plan adopted land use or density/intensity range; a change in the adopted community plan</p>

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	<p>development phasing schedule; or a change in plan policies, maps, and diagrams. (Note: state law mandates that General Plan and community plan amendments are not to be required for projects utilizing state mandated housing density bonuses.)</p> <p>LU-D.2. Require an amendment to the public facilities financing plan concurrently with an amendment to the General Plan and community plan when a proposal results in a demand for public facilities that is different from the adopted community plan and public facilities financing plan.</p> <p>LU-D.3. Evaluate all plan amendment requests through the plan amendment initiation process and present the proposal to the Planning Commission or City Council for consideration.</p> <p>LU-D.4. During a community plan update process, community plan amendments will be accepted until the final land use scenarios have been established.</p> <p>LU-D.5. Maintain and update on a regular basis a database of land use plan amendments approved by the City in order to create an annual report for tracking of land use plan amendments.</p> <p>LU-D.6. Initiate a technical amendment without the need for a public Planning Commission hearing when the City determines, through a Single Discipline Preliminary Review, that the proposed amendment is appropriate in order to:</p> <ol style="list-style-type: none"> a. Correct a map or text error, and/or omission made when the land use plan was adopted or during subsequent amendments and/or implementation; b. Address other technical corrections discovered during implementation; c. Ensure the public health, safety, and welfare; d. Establish the location and design of a public facility already identified in the adopted Capital Improvements Program; e. Comply with changes in state or federal law or applicable findings of a court of law; and f. Revise language concerned solely with a process or procedural matter or an appendix to update information. <p>LU-D.7. Subject technical amendments to the processing procedures identified in the General Plan Amendment Manual.</p> <p>LU-D.8. Require that General Plan and community plan amendment initiations (except those determined to be technical as specified in LU-D.6 and LU-D.11) be decided by the Planning Commission with the ability for the applicant to submit a request to the City Clerk for the City Council to consider the initiation if it is denied.</p> <p>LU-D.9. Recognize the ability of the City Council to initiate a General Plan and community plan amendment when direction is received through a vote of the City Council without demonstration of meeting the initiation criteria to prepare a plan amendment.</p> <p>LU-D.10. Require that the recommendation of approval or denial to the Planning Commission be based upon compliance with all of the three initiation criteria as follows: a) the amendment request appears to be consistent with the goals and policies of the General Plan and community plan and any community plan specific amendment criteria; b) the proposed amendment provides additional public benefit to the community as compared to the existing land use designation, density/intensity range, plan policy or site</p>

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	<p>design; and c) public facilities appear to be available to serve the proposed increase in density/intensity, or their provision will be addressed as a component of the amendment process.</p> <p>LU-D.11. Acknowledge that initiation of a plan amendment in no way confers adoption of a plan amendment, that neither staff nor the Planning Commission is committed to recommend in favor or denial of the proposed amendment, and that the City Council is not committed to adopt or deny the proposed amendment.</p> <p>LU-D.12. Evaluate specific issues that were identified through the initiation process as well as any additional community-specific amendment evaluation factors.</p> <p>LU-D.13. Address the following standard plan amendment issues prior to the Planning Commission decision at a public hearing related to level and diversity of community support: appropriate size and boundary for the amendment site; provision of additional benefit to the community; implementation of major General Plan and community plan goals, especially as related to the vision, values and City of Villages strategy; and provision of public facilities.</p> <p>LU-D.14. Consider consolidating multiple concurrent land use plan amendment proposals to analyze and assess the impacts of the development projects and the land use changes cumulatively.</p> <p>LU-G.1. Work with the ALUC to develop policies that are consistent with the state and federal regulations and guidelines, that balance airport land use compatibility goals with other citywide and regional goals, and that emphasize the major airport land use compatibility factors.</p> <p>LU-G.2. Submit all amendments and updates to the General Plan, community plans, specific plans, airport plans, development regulations and zoning ordinances affected by an airport influence area to the ALUC to ensure that they are consistent with the Airport Land Use Compatibility Plan or have the City Council take steps to overrule the ALUC.</p> <p>LU-G.3. Submit the General Plan, community plans, and specific plans 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 or have the City Council take steps to overrule the ALUC.</p> <p>LU-G.4. 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>LU-G.5. Implement the height standards used by the FAA as defined by Code of Federal Regulations Title 14, Part 77 through development regulations and zoning ordinances.</p> <p>LU-G.6. Require that all proposed development projects (ministerial and discretionary actions) notify the FAA in areas where the proposed development meets the notification criteria as defined by Code of Federal Regulation Title 14, Part 77.</p> <p>a. Require that all proposed development projects that are subject to FAA notification requirement provide documentation that FAA has determined that the project is not a Hazard to Air Navigation prior to</p>

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	<p>project approval.</p> <p>b. Require that the Planning Commission and City Council approve any proposed development that the FAA has determined to be a Hazard to Air Navigation once state and ALUC requirements are satisfied.</p> <p>LU-G.7. Evaluate the siting and expansions of airports and heliports on the basis of aviation and land use need and the impacts on surrounding land uses.</p>
Mineral Resources	<p>No Mitigation Measures are available at the Program EIR level of review that could reduce significant impacts to important mineral resources. See the following Draft General Plan policies:</p> <p>CE-K.1. Promote the recycling and reclamation of construction materials to provide for the City’s current and future growth and development needs (see also Public Facilities, Policy PF-I.1 and Conservation Element, Policy CE-A.8).</p> <p>CE-K.2. Permit new or expanding mining operations within the MHPA in accordance with MSCP policies and guidelines.</p> <p>CE-K.3. Produce sand and gravel with minimal harm and disturbance to adjacent property and communities.</p> <p>CE-K.4. Plan rehabilitation of depleted mineral areas to facilitate reuse consistent with state requirements, the Surface Mining and Reclamation Act (SMARA), and local planning goals and policies, including the MSCP.</p> <p>CE-K.5. Consider local evaporative salt production for future economic value, open space use, and for important ecological habitat.</p>
Noise	<p>Future development projects in areas where the existing or future noise level exceeds or would exceed the compatible noise level thresholds as indicated in the Land Use Compatibility for Community Noise Environment Table (Table 3.10-7) must perform an acoustical study consistent with Acoustical Study Guidelines (Table NE-4 in the Draft General Plan), so that appropriate noise mitigation measures are included in the project design to meet the noise guidelines. See the following Draft General Plan policies:</p> <p>NE-A.1. Separate excessive noise-generating uses from residential and other noise-sensitive land uses with a sufficient spatial buffer of less sensitive uses.</p> <p>NE-A.2. Assure 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>NE-A.3. Limit future residential and other noise-sensitive land uses in areas exposed to high levels of noise.</p> <p>NE-A.4. Require an acoustical study consistent with Acoustical Study Guidelines (Table NE-4) for proposed developments in areas where the existing or future noise level exceeds or would exceed the “compatible” noise level thresholds as indicated on the Land Use - Noise Compatibility Guidelines (Table NE-3), so that noise mitigation measures can be included in the project design to meet the noise guidelines.</p> <p>Future projects must be sited and designed in a manner that avoids noise impacts to noise-sensitive land uses (e.g., residences, hospitals, schools, and libraries) and sensitive receptors. Prior to approval of any entitlement for a future project, the City will identify any noise impacts and measures to reduce and avoid such impacts in accordance with the City’s Noise</p>

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	<p>Ordinance and state regulations. This may require preparation of a noise analysis. See the following Draft General Plan policies:</p> <p>NE-A.1. Separate excessive noise-generating uses from residential and other noise-sensitive land uses with a sufficient spatial buffer of less sensitive uses.</p> <p>NE-A.2. Assure 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>NE-A.3. Limit future residential and other noise-sensitive land uses in areas exposed to high levels of noise.</p> <p>NE-A.4. Require an acoustical study consistent with Acoustical Study Guidelines (Table NE-4) for proposed developments in areas where the existing or future noise level exceeds or would exceed the “compatible” noise level thresholds as indicated on the Land Use - Noise Compatibility Guidelines (Table NE-3), so that noise mitigation measures can be included in the project design to meet the noise guidelines.</p>
	<p>Where uses, particularly habitable structures, are planned near noise-generating sources, future projects must use a combination of architectural treatments or alternative methods to bring interior noise levels to below 45 dBA or 50 dBA for specified uses as indicated in Table 3.10-7. See the following Draft General Plan policies:</p> <p>NE-I.1. Require noise attenuation measures to reduce the noise to an acceptable noise level for proposed developments to ensure an acceptable interior noise level, as appropriate, in accordance with California’s noise insulation standards (CCR Title 24) and Airport Land Use Compatibility Plans.</p> <p>NE-I.2. Apply CCR Title 24 noise attenuation measures requirements to reduce the noise to an acceptable noise level for proposed single-family, mobile homes, senior housing, and all other types of residential uses not addressed by CCR Title 24 to ensure an acceptable interior noise level, as appropriate.</p> <p>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.</p> <p>NE-I.4. Support state regulation streamlining to allow standardized noise attenuation building and construction materials as an option to current requirements for acoustical evaluation.</p> <p>Future development projects that are located in an Airport Influence Area must use appropriate noise attenuation methods recommended in the appropriate Airport Land Use Compatibility Plans in order to meet acceptable interior noise levels for the use and aviation easements where required. See the following Draft General Plan policies:</p> <p>NE-D.1. Encourage noise-compatible land use within airport influence areas in accordance with federal and state noise standards and guidelines.</p> <p>NE-D.2. Limit future residential uses within airport influence areas to the 65 dBA CNEL airport noise contour, except for multiple-unit, mixed-use, and live</p>

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	<p>work residential uses within the San Diego International airport influence area in areas with existing residential uses and where a community plan and the Airport Land Use Compatibility Plan allow future residential uses.</p> <p>NE-D.3. Ensure that future multiple-unit, mixed-use, and live work residential uses within the San Diego International airport influence area that are located greater than the 65 dBA CNEL airport noise contour are located in areas with existing residential uses and where a community plan and Airport Land Use Compatibility Plan allow future residential uses.</p> <p>a. Limit the amount of outdoor areas subject to exposure above the 65 dBA CNEL; and</p> <p>b. Provide noise attenuation to ensure an interior noise level that does not exceed 45 dBA CNEL.</p> <p>NE-D.4. Discourage outdoor uses in areas where people could be exposed to prolonged periods of high aircraft noise levels greater than the 65 dBA CNEL airport noise contour.</p> <p>NE-D.5. Study single event noise levels in areas exposed to aircraft noise levels greater than the 60 dBA CNEL for discretionary development projects with residential and other noise-sensitive uses.</p> <p>NE-D.6. Minimize excessive aircraft noise from aircraft operating at Montgomery Field to surrounding residential areas.</p> <p>a. Implement a noise-monitoring program to assess aircraft noise.</p> <p>b. Implement nighttime aircraft noise limits and a weight limit for aircraft using the airport.</p> <p>NE-D.7. Encourage civilian and military airport operators, to the extent practical, to monitor aircraft noise, implement noise-reducing operation measures, and promote pilot awareness of where aircraft noise affects noise-sensitive land uses.</p>
	<p>All non-emergency construction activity for future projects must comply with the limits (maximum noise levels, hours and days of activity) established in state and City noise regulations. See the following Draft General Plan policies:</p> <p>NE-G.1. Implement limits on the hours of operation for non-emergency construction and refuse vehicle and parking lot sweeper activity in residential areas and areas abutting residential areas.</p> <p>NE-G.2. Implement limits on excessive public noises that a person could reasonably consider disturbing and/or annoying in residential areas and areas abutting residential areas.</p>
Paleontological Resources	At this time, mitigation is accomplished through monitoring, recovery, and curation of fossils. Steps are taken to identify and mitigate significant impacts to paleontological resources as part of the discretionary review of development projects.
Population and Housing	Specific mitigation at the Program EIR level is not available. However, measures incorporated into future projects may reduce any potential impacts.
Public Facilities	The need for new or upgraded facilities is addressed through the various means the City uses to fund the capital and operating expenses related to public facilities (e.g., developer fees and City Council budget decisions). However, the analysis of public services and facilities in this document focuses on the physical environmental impacts that could result from the construction of new facilities or the alteration of existing facilities. It is anticipated that many of these activities would result in physical impacts. Therefore, the framework for the

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	<p>mitigation of public services and facilities projects will vary, depending on the type of physical impacts resulting from each project. For instance, if the construction of a new park would impact biological and historical resources, the project’s mitigation measures would be developed using the mitigation framework in the Biological and Historical Resources sections contained in this document. In other words, the Public Facilities and Services mitigation framework is contained in the relevant impact issue area chapters of this document. See the following Draft General Plan policies:</p> <p>PF-C.1. Require development proposals to fully address impacts to public facilities and services.</p> <ol 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>PF-C.2. Require a fiscal impact analysis to identify operations and maintenance costs with a community plan amendment proposal of potential fiscal significance.</p> <p>PF-C.3. Satisfy a portion of the requirements of PF-C.1 through physical improvements, when a nexus exists, that will benefit the affected community planning area when projects necessitate a community plan amendment due to increased densities</p> <p>PF-C.4. Reserve the right and flexibility to use the City’s police powers and fiscal powers to impose timing and sequencing controls on new development to regulate the impacts and demands on existing or new facilities and services.</p> <p>PF-C.5. Develop a centralized citywide monitoring system, accessible to the public, to document and report on the following:</p> <ul style="list-style-type: none"> • New Development - development proposals, fiscal impacts, operations and maintenance requirements, required plan amendments, exactions, service level and capacity impacts; • Capital Improvements Program (CIP) - funding sources, project and funding schedules, project amendments, project costs, project locations, project status; and • Existing Conditions - facility inventory, service and capacity levels, repair and replacement schedules, facility records (size, age, location, useful life, value, etc.). <p>PF-D.4. Provide a minimum 3/4-acre fire station site area and allow room for station expansion.</p> <ol style="list-style-type: none"> a. Consider the inclusion of fire station facilities in development projects as an alternative method to the acreage guideline. b. Acquire adjacent sites that would allow for station expansion as

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	<p>opportunities allow.</p> <p>c. Gain greater utility of fire facilities by pursuing joint use opportunities such as community meeting rooms or collocating with police, libraries, or parks where appropriate.</p> <p>PF-D.6. Provide public safety related facilities and services to assure that adequate levels of service are provided to existing and future development.</p> <p>PF-D.9. Provide and maintain a training facility and program to ensure fire-rescue personnel are properly trained.</p> <p>PF-D.10. Buffer or incorporate design elements to minimize impacts from fire stations to adjacent sensitive land uses, when feasible.</p> <p>PF-D.11. Space oceanfront seasonal lifeguard towers every 1/10 of a mile or ten towers per mile.</p> <p>PF-E.3. Buffer or incorporate design elements to minimize impacts from police stations to adjacent sensitive land uses, when feasible.</p> <p>PF-E.4. Plan for new facilities, including new police substations and other support facilities that will adequately support additional sworn and civilian staff.</p> <p>PF-E.5. Design and construct new police facilities consistent with sustainable development policies (see also Conservation Element, Section A).</p> <p>PF-F.5. Construct and maintain facilities to accommodate regional growth projections that are consistent with sustainable development policies (see also Conservation Element, Section A).</p> <p>PF-F.6. Coordinate land use planning and wastewater infrastructure planning to provide for future development and maintain adequate service levels.</p> <p>PF-H.2. Provide and maintain essential water storage, treatment, and supply facilities and infrastructure to serve existing and future development.</p> <p>PF-I.3. Provide environmentally sound waste disposal facilities and alternatives.</p> <p>a. Design and operate disposal facilities located within the City, or that serve as a destination for City waste, to meet or exceed the highest applicable environmental standards.</p> <p>b. Identify and investigate alternatives to standard disposal practices as fiscally and environmentally-sound technologies become available.</p> <p>c. Ensure efficient, environmentally-sound refuse and recyclable materials collection and handling through appropriate infrastructure, alternative fuel use, trip coordination, and other alternatives.</p> <p>d. Ensure environmentally and economically sound disposal options for materials that cannot be effectively reduced, reused, recycled, or composted.</p> <p>e. Plan for disposal needs considering factors such as trip distance and environmentally sound disposal capacity.</p> <p>f. Cooperate on a regional basis with local governments, state agencies, and private solid waste companies to find the best practicable, environmentally safe, and equitable solutions to solid and hazardous waste management.</p> <p>g. Maximize environmental benefit in landfill-based waste diversion and effective load check programs by ensuring that recyclable or hazardous materials do not end up in the landfill.</p> <p>h. Use closed and inactive landfill sites for public benefits, such as provision of energy from waste generated methane, creation of wildlife habitat upon proper remediation or other land uses</p>

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	determined to be appropriate.
	PF-J.1. Develop and maintain a Central Library to adequately support the branch libraries and serve the as a major resource library for the region and beyond.
	PF-J.2. Design all libraries with a minimum of 15,000 square feet of dedicated library space, with adjustments for community-specific needs. Library design should incorporate public input to address the needs of the intended service area.
	PF-J.3. Plan for larger library facilities that can serve multiple communities and accommodate sufficient space to serve the larger service area and maximize operational and capital efficiencies.
	PF-J.4. Build new library facilities to meet energy efficiency and environmental requirements consistent with sustainable development policies (see also Conservation Element, Section A).
	PF-J.5. Plan new library facilities to maximize accessibility to village centers, public transit, or schools.
	PF-K.3. Consider use of smaller school sites for schools that have smaller enrollments, and/or incorporate space-saving design features (multi-story buildings, underground parking, placement of playgrounds over parking areas or on roofs, etc.).
	PF-K.4. Collaborate with school districts and other education authorities in the siting of schools and educational facilities to avoid areas with: fault zones; high-voltage power lines; major underground fuel lines; landslides and flooding susceptibility; high-risk aircraft accident susceptibility; excessive noise (see also Noise Element, Table NE-3, Noise Compatibility Guidelines); industrial uses; hazardous material sites, and significant motorized emissions.
	PF-K.5. Work with school districts and other education authorities to better utilize land through development of multi-story school buildings and educational facilities.
	PF-K.6. Continue joint use of schools with adult education, civic, recreational (see also Recreation Element, Section D) and community programs, and also for public facility opportunities.
	PF-K.7. Work with the school districts and other education authorities to develop school and educational facilities that are architecturally designed to reflect the neighborhood and community character, that are pedestrian and cycling friendly (see also Mobility Element, Policy ME-A.2), and that are consistent with sustainable development policies (see also Conservation Element, Section A) and urban design policies (see also Urban Design Element, Section A.9).
	PF-K.8. Work with school districts and other education authorities to avoid environmentally protected and sensitive lands in the siting of schools and educational facilities.
	PF-M.3. Integrate the design and siting of safe and efficient public utilities and associated facilities into the early stages of the long range planning and development process, especially in redevelopment/urban areas where land constraints exist.
	PF-M.4. Cooperatively plan for and design new or expanded public utilities and associated facilities (e.g., telecommunications infrastructure, planned

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	<p>energy generation facilities, gas compressor stations, gas transmission lines, electrical substations and other large scale gas and electrical facilities) to maximize environmental and community benefits.</p> <ol style="list-style-type: none"> a. Use transmission corridors to enhance and complement wildlife movement areas and preserved open space habitat as identified in the City’s Multiple Species Conservation Program (MSCP). b. Provide adequate buffering and maintained landscaping between utility facilities and residential and non-residential uses, including the use of non-building areas and/or rear setbacks. c. Maximize land use and community benefit by locating compatible/appropriate uses within utility easements/right-of-ways (e.g., passive parkland, natural open space, wildlife movement, urban gardens, plant nurseries, parking, access roads, and trails). Trails can be allowed in these easement/right-of-ways, provided proper indemnification, funding and maintenance is set forth in a written agreement between the public utility, the City and project developer. d. For projects, in particular large-scale developments (such as those requiring redevelopment plans, community plan updates, general plan amendments), consult and coordinate with all appropriate public utilities early on to determine the type, size, and location of facilities that are needed to accommodate the project’s increased demand. e. Incorporate public art with public utility facilities, especially in urban areas. f. Ensure utility projects account for maintenance of community streetscape elements and street trees. g. Coordinate projects in the public right-of-way with all utility providers. <p>PF-O.2. Coordinate with providers so that the expansion or construction of new healthcare facilities addresses General Plan and community plan goals.</p>
Public Utilities	<p>Innovative project design, construction and operations to reduce stormwater pollution, and energy use, and waste generation. The City’s Sustainable Building Policy (900-14) allows an expedited review time for the private sector who presents building projects meeting LEED silver criteria. See the following Draft General Plan policies:</p> <ol style="list-style-type: none"> CE-A.1. Influence state and federal efforts to reduce greenhouse gas emissions so that implementation requirements are equitably applied throughout the state, and to address actions that are beyond the jurisdiction of local government. CE-A.2. Reduce the City’s carbon footprint. Develop and adopt new or amended regulations, programs, and incentives as appropriate to implement the goals and policies set forth in the General Plan to: <ul style="list-style-type: none"> • Create sustainable and efficient land use patterns to reduce vehicular trips and preserve open space; • Reduce fuel emission levels by encouraging alternative modes of transportation and increasing fuel efficiency; • Improve energy efficiency, especially in the transportation sector and buildings and appliances; • Reduce the Urban Heat Island effect through sustainable design and

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	<p>building practices, as well as planting trees (consistent with habitat and water conservation policies) for their many environmental benefits, including natural carbon sequestration;</p> <ul style="list-style-type: none"> • Reduce waste by improving management and recycling programs; • Plan for water supply and emergency reserves; and <p>Refer to Table CE-1, Issues Related to Climate Change Addressed in the General Plan, for a comprehensive list of policies related to each of the above issues.</p> <p>CE- A.3. Collaborate with climate science experts on local climate change impacts, mitigation, and adaptation, including sea level changes, to inform public policy decisions.</p> <p>CE- A.4. Pursue the development of “clean” or “green” sector industries that benefit San Diego’s environment and economy.</p> <p>CE-A.5. Employ sustainable or “green” building techniques for the construction and operation of buildings, where feasible.</p> <ol style="list-style-type: none"> a. Design new and major remodels to City buildings to achieve, at a minimum, the Silver Rating goal identified by the Leadership in Energy and Environmental Design (LEED™) Green Building Rating System to conserve resources, including but not limited to energy and renewable resources. b. Incorporate green building components into all City-funded construction projects to incorporate “green” building components, including self-generation of energy to the extent feasible. c. Provide technical services for “green” buildings in partnership with other agencies and organizations. d. Improve the energy efficiency of commercial buildings. <p>CE-A.6 Design and build energy efficient buildings where feasible using “green” technology and principles such as:</p> <ul style="list-style-type: none"> • Designing mechanical and electrical systems that achieve maximum energy efficiency with currently available technology. • Minimizing energy use through innovative site design and building orientation that address factors such as sun-shade patterns, prevailing winds, landscape, and sun-screens. • Employing self-generation of energy using renewable technologies. • Combining energy efficiency measures that have longer payback periods with measures that have shorter payback periods; and • Reducing levels of non-essential lighting, heating and cooling. • Using energy efficient appliances and lighting. <p>CE-A.7. Construct and operate buildings using materials, methods, and mechanical and electrical systems that ensure a healthful indoor air quality. Avoid contamination by carcinogens, volatile organic compounds, fungi, molds, bacteria, and other known toxins.</p> <ol style="list-style-type: none"> a. Eliminate the use of chlorofluorocarbon-based refrigerants in newly constructed facilities and major building renovations and retrofits for all heating, ventilation, air conditioning, and refrigerant-based

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	<p>building systems.</p> <p>b. Reduce the quantity of indoor air contaminants that are odorous or potentially irritating to protect installers and occupants' health and comfort. Select low-emitting adhesives, paints, coatings, carpet systems, composite wood, agri-fiber products, and others.</p> <p>CE-A.8. Reduce construction and demolition waste in accordance with Public Facilities Element, Policy PF-I-2, or by renovating or adding on to existing buildings, rather than constructing new buildings where feasible.</p> <p>CE-A.9. Reuse building materials, use materials that have recycled content, or use materials that are derived from sustainable or rapidly renewable sources to the extent possible, through factors such as:</p> <ul style="list-style-type: none"> • Scheduling time for deconstruction and recycling activities to take place during project demolition and construction phases. • Using life cycle costing in decision-making for materials and construction techniques. Life cycle costing analyzes the costs and benefits over the life of a particular product, technology, or system; and • Removing code obstacles to using recycled materials in buildings and for construction.
	<p>Implementation of water and energy conservation measures beyond what is required by local, state, and federal regulations. See the following Draft General Plan policies:</p> <p>CE-I.1. Maintain a centralized Energy Conservation and Management Program and Comprehensive Plan for all City of San Diego operations.</p> <p>CE-I.2. Coordinate City energy planning programs with federal, state and regional agencies.</p> <p>CE-I.3. Pursue state and federal funding opportunities for research and development of alternative and renewable energy sources.</p> <p>CE-I.4. Maintain and promote water conservation and waste diversion programs to conserve energy.</p> <p>CE-I.5. Support the installation of photovoltaic panels, and other forms of renewable energy production.</p> <p>a. Seek funding to incorporate renewable energy alternatives in public buildings.</p> <p>b. Promote the use and installation of renewable energy alternatives in new and existing development.</p> <p>CE-I.6. Develop emergency contingency plans, in cooperation with other local agencies and regional suppliers, to assure essential energy supplies and reduce non-essential consumption during periods of energy shortage.</p> <p>CE-I.7. Pursue investments in energy efficiency and direct sustained efforts towards eliminating inefficient energy use.</p> <p>CE-I.8. Improve fuel-efficiency to reduce consumption of fossil fuels.</p> <p>CE-I.9. Implement local and regional transportation policies that improve mobility and increase energy efficiency and conservation.</p> <p>CE-I.10. Use renewable energy sources to generate energy needed by new development to the extent feasible.</p> <p>CE-I.11. Collaborate with others to develop incentives to increase the use of renewable energy sources or reduce use of non-renewable energy sources.</p>

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	<p>CE-I.12. Use small, decentralized, aesthetically-designed energy efficient power generation facilities where feasible.</p> <p>CE-I.13. Promote and conduct energy conservation education.</p> <p>CE-N.2. Maintain educational programs to sustain public awareness of the importance of resource conservation (e.g., energy, water, open space), the continued existence of long-term resource demand challenges, and specific conservation tactics that are recommended.</p> <p>CE-N.4. Publicize voluntary water and energy conservation measures that focus on reducing waste and decreasing the possibility of rationing and other undesirable restrictions.</p>
	<p>Project siting, mix of land uses, and design that reduces the need to drive, thus reducing vehicle miles traveled compared to what would occur through conventional development. See the following Draft General Plan policies:</p> <p>LU-A.1. Designate a hierarchy of village sites for citywide implementation.</p> <ol style="list-style-type: none"> a. Affirm the position of Downtown San Diego as the regional hub by maintaining and enhancing its role as the major business center in the region and encouraging its continued development as a major urban residential center with the largest concentration of high-density multifamily housing in the region. b. Encourage further intensification of employment uses throughout Subregional Employment Districts. Where appropriate, consider collocating medium- to high- density residential uses with employment uses (see also Economic Prosperity Element). c. Designate Neighborhood, Community, and Urban Village Centers, as appropriate, in community plans throughout the City, where consistent with public facilities adequacy and other goals of the General Plan. d. Revitalize transit corridors through the application of plan designations and zoning that permits a higher intensity of mixed-use development. Include some combination of: residential above commercial development, employment uses, commercial uses, and higher density-residential development. <p>LU-A.2. Identify sites suitable for mixed-use village development that will complement the existing community fabric or help achieve desired community character, with input from recognized community planning groups and the general public.</p> <p>LU-A.3. Identify and evaluate potential village sites considering the following physical characteristics:</p> <ul style="list-style-type: none"> • Shopping centers, districts, or corridors that could be enhanced or expanded; • Community or mixed-use centers that may have adjacent existing or planned residential neighborhoods; • Vacant or underutilized sites that are outside of open space or community-plan designated single-family residential areas; • Areas that have significant remaining development capacity based upon the adopted community plan; and • Areas that are not subject to major development limitations due to

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	<p>topographic, environmental, or other physical constraints.LU-A.4. Locate village sites where they can be served by existing or planned public facilities and services, including transit services.</p> <p>LU-A.5. Require environmental review and additional study for potential village locations, with input from recognized community planning groups and the general public, to determine if these locations are appropriate for mixed-use development and village design.</p> <p>LU-A.6. Recognize that various villages may serve specific functions in the community and City; some villages may have an employment orientation, while others may be major shopping destinations, or primarily residential in nature.</p> <p>LU-A.7. Determine the appropriate mix and densities/intensities of village land uses at the community plan level, or at the project level when adequate direction is not provided in the community plan.</p> <p>a. Consider the role of the village in the City and region; surrounding neighborhood uses; uses that are lacking in the community; community character and preferences; and balanced community goals (see also Section H).</p> <p>b. Achieve transit-supportive density and design, where such density can be adequately served by public facilities and services (see also Mobility Element, Policy ME-B.9).</p> <p>LU-A.8. Determine at the community plan level where commercial uses should be intensified within villages and other areas served by transit, and where commercial uses should be limited or converted to other uses.</p> <p>LU-A.9. Integrate public gathering spaces and civic uses into village design (see also Urban Design Element, Policies UD-C.5 and UD-E.1).</p> <p>LU-A.10. Design transit corridor infill projects along transit corridors to enhance or maintain a “Main Street” character through attention to site and building design, land use mix, housing opportunities, and streetscape improvements.</p>
Traffic	<p>Strategic planting of trees in quantities and locations that maximizes environmental benefits such as shading.</p> <p>Walkable Communities – See the following Draft General Plan policies:</p> <p>ME-A.1. 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>ME-A.2. Design and implement safe pedestrian routes.</p> <p>a. Collaborate with appropriate community groups, and other interested private and public sector groups/ individuals to design and implement safe pedestrian routes to schools, transit, and other highly frequented destinations.</p> <p>b. Implement needed improvements and programs such as wider and non-contiguous sidewalks, more visible pedestrian crossings, traffic enforcement, traffic calming, street and pedestrian lighting, pedestrian trails, and educating children on traffic and bicycle safety.</p> <p>c. Promote “Walking School Bus” efforts where parents or other</p>

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	<p>responsible adults share the responsibility of escorting children to and from school by foot or bicycle.</p> <p>d. When new schools are planned, work with school districts and affected communities to locate schools so that the number of students who can walk to school safely is maximized.</p> <p>e. Implement Crime Prevention Through Environmental Design (CPTED) measures to reduce the threat and incidence of crime in the pedestrian environment (see also Urban Design Element, Policy UD-A.17).</p> <p>f. Ensure that there are adequate law enforcement, code enforcement, and litter and graffiti control to maintain safe and attractive neighborhoods.</p> <p>g. Provide adequate levels of lighting for pedestrian safety and comfort.</p> <p>ME-A.3. Engage in a public education campaign to increase drivers' awareness of pedestrians and bicyclists, and to encourage more courteous driving.</p> <p>ME-A.4. Make sidewalks and street crossings accessible to pedestrians of all abilities.</p> <p>a. Meet or exceed all federal and state requirements.</p> <p>b. Provide special attention to the needs of children, the elderly, and people with disabilities.</p> <p>c. Maintain pedestrian facilities to be free of damage or trip hazards.</p> <p>ME-A.5. Provide adequate sidewalk widths and clear path of travel, as determined by street classification, adjoining land uses, and expected pedestrian usage.</p> <p>a. Minimize obstructions and barriers that inhibit pedestrian circulation.</p> <p>b. Consider pedestrian impacts when designing the width and number of driveways within a street segment.</p> <p>ME-A.6. 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> <ol style="list-style-type: none"> 1. Close gaps in the sidewalk network. 2. Provide convenient pedestrian connections between land uses, including shortcuts where possible. 3. Design grading plans to provide convenient and accessible pedestrian connections from new development to adjacent uses and streets. <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>c. Provide and maintain trash and recycling receptacles, and restrooms available to the public where needed.</p> <p>d. Address pedestrian needs as an integral component of community and public facilities financing plan updates and amendments, other planning studies and programs, and the development project review process.</p>

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	<p>e. Routinely accommodate pedestrian facilities and amenities into private and public plans and projects.</p> <p>ME-A.7. 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>c. Encourage the use of non-contiguous sidewalk design where appropriate to help separate pedestrians from auto traffic. In some areas, contiguous sidewalks with trees planted in grates adjacent to the street may be a preferable design.</p> <p>d. Enhance alleys as secure pathways to provide additional pedestrian connections.</p> <p>e. Implement traffic calming measures to improve walkability in accordance with Policy ME-C.5.</p> <p>f. When existing sidewalks are repaired or replaced, take care to retain sidewalk stamps and imprints that are indicators of the age of a particular neighborhood, or that contribute to the historic character of a neighborhood.</p> <p>ME-A.8. Encourage a mix of uses in villages, commercial centers, transit corridors, employment centers and other areas as identified in community plans so that it is possible for a greater number of short trips to be made by walking.</p> <p>ME.A.9. Continue to collaborate with regional agencies, school districts, community planning groups, community activists, public health professionals, developers, law and code enforcement officials, and others, to better realize the mobility, environmental, social, and health benefits of walkable communities.</p>
	<p>Street and Freeway System – (see Draft General Plan policies ME-C.1 thru ME-C.10) See the following Draft General Plan policies:</p> <p>ME-C.1. Identify the general location and extent of streets, sidewalks, trails, and other transportation facilities and services needed to enhance mobility in community plans.</p> <p>a. Protect and seek dedication or reservation of right-of-way for planned transportation facilities through the planning and development review process.</p> <p>b. Implement street improvements and multi-modal transportation improvements as needed with new development and as areas redevelop over time.</p> <p>c. Identify streets or street segments where special design treatments are desired to achieve community goals.</p> <p>d. Identify streets or street segments, if any, where higher levels of vehicle congestion are acceptable in order to achieve vibrant</p>

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	<p>community centers, increase transit-orientation, preserve or create streetscape character, or support other community-specific objectives.</p> <p>e. Increase public input in transportation decision-making, including seeking input from multiple communities where transportation issues cross community boundaries.</p> <p>ME-C.2. Increase capacity and reduce congestion on the street and freeway system.</p> <p>a. Identify the City of San Diego’s priorities for transportation infrastructure projects.</p> <p>b. Provide the City’s identified priorities for transportation infrastructure projects to SANDAG and Caltrans for funding purposes.</p> <p>c. Work with SANDAG and Caltrans towards the implementation of the City’s identified priorities for transportation infrastructure projects (see also Public Facilities Element, Policy PF-B.3).</p> <p>d. Collaborate with SANDAG and Caltrans to ensure that relevant General Plan policies and community plan identified street network are reflected in regional and state plans and programs.</p> <p>e. Provide rights-of-way for designated HOV facilities and transit facilities on City streets where feasible.</p> <p>f. Evaluate RTP proposals for new or redesigned streets and freeways on the basis of demonstrated need and consistency with General Plan policies and community plan facility recommendations.</p> <p>ME-C.3. Design an interconnected street network within and between communities, which includes pedestrian and bicycle access, while minimizing landform and community character impacts.</p> <p>a. Identify locations where the connectivity of the street network could be improved through the community plan update and amendment process, the Regional Transportation Plan update process, and through discretionary project review (see also Urban Design Element, Policy UD-B.5).</p> <p>b. Use local and collector streets to form a network of connections to disperse traffic and give people a choice of routes to neighborhood destinations such as schools, parks, and village centers. This network should also be designed to control traffic volumes and speeds through residential neighborhoods.</p> <p>1. In newly developing areas or in large-scale redevelopment/infill projects, strive for blocks along local and collector streets to have a maximum perimeter of 1,800 feet.</p> <p>2. When designing modifications/improvements to an existing street system, enhance street or pedestrian connections where possible.</p> <p>c. Provide direct and multiple street and sidewalk connections within development projects, to neighboring projects, and to the community at large.</p> <p>d. Where possible, design or redesign the street network, so that wide arterial streets do not form barriers to pedestrian traffic and community cohesiveness.</p> <p>ME-C.4. Improve operations and maintenance on City streets and sidewalks.</p> <p>a. Regularly optimize traffic signal timing and coordination to improve circulation. Implement new signal and intersection technologies that improve pedestrian, bicycle, and vehicular safety while improving</p>

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	<p>overall circulation.</p> <ul style="list-style-type: none"> b. Adequately maintain the transportation system through regular preventative maintenance and repair, and life cycle replacement. c. Encourage community participation in planning, assessing, and prioritizing the life cycle management of the circulation system. d. When new streets and sidewalks are built and as existing streets and sidewalks are modified - design, construct, operate, and maintain them to accommodate and balance service to all users/modes (including walking, bicycling, transit, high occupancy vehicles (HOVs), autos, trucks, automated waste and recycling collection vehicles, and emergency vehicles). e. Continue to pursue adequate maintenance of sidewalks by property owners and investigate new approaches to facilitate improved sidewalk maintenance citywide. <p>ME-C.5. Install traffic calming measures as appropriate in accordance with site-specific recommendations which may include but are not limited to those identified on Table ME-2, to increase the safety and enhance the livability of communities.</p> <ul style="list-style-type: none"> a. Use traffic calming techniques in appropriate locations to reduce vehicle speeds or discourage shortcutting traffic. b. Choose traffic calming devices to best fit the situations for which they are intended. c. Place traffic calming devices so that the full benefit of calming will be realized with little or no negative effect upon the overall safety or quality of the roadway. d. Design traffic calming devices appropriately, including consideration for accessibility, drainage, underground utilities, adequate visibility, the needs of emergency, sanitation, and transit vehicles, and landscaping. e. Weigh any potential undesired effects of traffic calming devices (such as increased travel times, emergency response times, noise, and traffic diversion) against their prescribed benefits. <p>ME-C.6. Locate and design new streets and freeways and, to the extent practicable, improve existing facilities to: respect the natural environment, scenic character, and community character of the area traversed; and meet safety standards.</p> <ul style="list-style-type: none"> a. Establish general road alignments and grades that respect the natural environment and scenic character of the area traversed. b. Design roadways and road improvements to maintain and enhance neighborhood character. c. Design streets and highways that incorporate physical elements to improve the visual aspects of roadways. d. Provide adequate rights-of-way for scenic lookouts, and obtain scenic easements to ensure the preservation of scenic views. e. Preserve trees and other aesthetic and traffic calming features in the median and along the roadside. f. Avoid or minimize disturbances to natural landforms. g. Contour manufactured slopes to blend with the natural topography. h. Promptly replant exposed slopes and graded areas to avoid erosion.

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	<ul style="list-style-type: none"> i. Employ landscaping to enhance or screen views as appropriate. j. Select landscape designs and materials on the basis of their aesthetic qualities, compatibility with the surrounding area, and low water demand and maintenance requirements. k. Utilize signs, lights, furniture, and other accessories suitable for the location. l. Place utility lines underground. m. Emphasize aesthetics and noise reduction in the design, improvement, and operation of streets and highways. n. Avoid frequent driveway curb cuts that create conflict points between autos and pedestrians. <p>ME-C.7. Preserve and protect scenic vistas along public roadways.</p> <ul style="list-style-type: none"> a. Identify state highways where the City desires to preserve scenic qualities and work with Caltrans to pursue official scenic highway designation. b. Designate scenic routes along City streets to showcase scenic vistas and to link points of visitor interest. c. Adopt measures to protect aesthetic qualities within scenic highways and routes. <p>ME-C.8. Maintain innovative Traffic Impact Study Guidelines with flexibility to address site and community specific issues.</p> <ul style="list-style-type: none"> a. Give consideration to the role of alternative modes of transportation and transportation demand management (TDM) plans in addressing development project traffic impacts. b. Consider the results of site-specific studies or reports that justify vehicle trip reductions. (See also Policy ME-E.7.) c. Use multimodal quality/level of service analysis guidelines to evaluate potential transportation impacts and determine appropriate mitigation measures from a multi-modal perspective. <p>ME-C.9. Use multimodal quality/level of service analysis guidelines to evaluate potential transportation improvements from a multi-modal perspective in order to determine optimal improvements that balance the needs of all users of the right of way.</p> <p>ME-C.10 Provide transportation facilities to serve new growth in accordance with Policies ME-K.4-K.6, and Public Facilities Element, Sections A-C.</p>
	<p>Transportation Demand Management (TDM) – See the following Draft General Plan policies:</p> <ul style="list-style-type: none"> ME-E.1. Support TDM strategies including, but not limited to: alternative modes of transportation, alternative work schedules, and telework. ME-E.2. Maintain and enhance personal mobility options by supporting public and private transportation projects that will facilitate the implementation of Transportation Demand Management (TDM) strategies. 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. ME-E.5. Support SANDAG's efforts to market TDM benefits to employers and identify strategies to reduce peak period employee commute trips.

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	<p>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.</p> <p>ME-E.7. Consider TDM programs with achievable trip reduction goals as partial mitigation for development project traffic and air quality impacts.</p> <p>ME-E.8. Monitor implementation of TDM programs to ensure effectiveness.</p>
	<p>Bicycling – (see Draft General Plan policies ME-F.1 thru ME-F.6) See the following Draft General Plan policies:</p> <p>ME-F.1. Implement the Bicycle Master Plan, which identifies existing and future needs, and provides specific recommendations for facilities and programs over the next 20 years.</p> <ul style="list-style-type: none"> a. Update the plan periodically as required by Caltrans, in a manner consistent with General Plan goals and policies. b. Coordinate with other local jurisdictions, SANDAG, schools, and community organizations to review and comment on bicycle issues of mutual concern. c. Reference and refine the plan, as needed, in conjunction with community plan updates. d. Improve connectivity of the multi-use trail network, for use by bicyclists and others as appropriate. <p>ME-F.2. Identify and implement a network of bikeways that are feasible, fundable, and serve bicyclists’ needs, especially for travel to employment centers, village centers, schools, commercial districts, transit stations, and institutions.</p> <ul style="list-style-type: none"> a. Develop a bikeway network that is continuous, closes gaps in the existing system, improves safety, and serves important destinations. b. Implement bicycle facilities based on a priority program that considers existing deficiencies, safety, commuting needs, connectivity of routes, and community input. c. Recognize that bicyclists use all City roadways. <ul style="list-style-type: none"> 1) Design future roadways to accommodate bicycle travel; and 2) Upgrade existing roadways to enhance bicycle travel, where feasible. <p>ME-F.3. Maintain and improve the quality, operation, and integrity of the bikeway network and roadways regularly used by bicyclists.</p> <p>ME-F.4. Provide safe, convenient, and adequate short- and long-term bicycle parking facilities and other bicycle amenities for employment, retail, multifamily housing, schools and colleges, and transit facility uses.</p> <p>ME-F.5. Increase the number of bicycle-transit trips by coordinating with transit agencies to provide safe routes to transit stops/stations, to provide secure bicycle parking facilities, and to accommodate bicycles on transit vehicles.</p> <p>ME-F.6. Develop and implement public education programs promoting bicycling</p>

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	<p>and bicycle safety.</p> <ul style="list-style-type: none"> a. Increase public awareness of the benefits of bicycling and the availability of resources and facilities. b. Increase government and public recognition of bicyclists' right to use public roadways.
	<p>Parking Management – See the following Draft General Plan policies:</p> <p>ME-G.1. Provide and manage parking so that it is reasonably available when and where it is needed.</p> <ul style="list-style-type: none"> a. Where parking deficiencies exist, prepare parking master plans to inventory existing parking (public and private), identify appropriate solutions, and plan needed improvements. b. Implement strategies to address community parking problems using a mix of parking supply, management, and demand solutions, including but not limited to those described on Table ME-3, Parking Strategies Toolbox. c. Recognize that parking demand is influenced by the users' (drivers) cost to park; consider the positive and negative implications of parking pricing when developing solutions to parking problems. <p>ME-G.2. Implement innovative and up-to-date parking regulations that address the vehicular and bicycle parking needs generated by development.</p> <ul style="list-style-type: none"> a. Adjust parking rates for development projects to take into consideration access to existing and funded transit with a base mid-day service frequency of ten to fifteen minutes, affordable housing parking needs, shared parking opportunities for mixed-use development, provision of on-site car sharing vehicles and parking spaces and implementation of TDM plans. b. Strive to reduce the amount of land devoted to parking through measures such as parking structures, shared parking, mixed-use developments, and managed public parking (see also ME-G.3), while still providing appropriate levels of parking. <p>ME-G.3. Manage parking spaces in the public rights-of-way to meet public need and improve investment of parking management revenue to benefit areas with most significant parking impacts.</p> <ul style="list-style-type: none"> a. Continue and expand the use of Community Parking Districts (CPD). The CPDs can be formed by communities to implement plans and activities designed to alleviate parking impacts specific to the community's needs. The CPDs also improve the allocation and investment of parking management revenue by providing the Community Parking Districts with a portion of the revenue generated within their boundaries for the direct benefit of the district. b. Implement parking management tools that optimize on-street parking turnover, where appropriate. c. Judiciously limit or prohibit on-street parking where needed to improve safety, or to implement multi-modal facilities such as bikeways, transitways, and parkways. <p>ME-G.4. Support innovative programs and strategies that help to reduce the space required for, and the demand for parking, such as those identified in</p>

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	<p>Section E.</p> <p>ME-G.5 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>Visual Effects- Neighborhood Character</p>	<p>No feasible specific mitigation has been identified at this program level. Future discretionary actions and proposals will be analyzed pursuant to CEQA and project level mitigation required. See the following Draft General Plan policies:</p> <p>CE-B.1. Protect and conserve the landforms and open spaces that: define the City’s urban form; provide public views/vistas; serve as core biological areas and wildlife linkages; are wetlands habitats; provide buffers within and between communities, or provide outdoor recreational opportunities.</p> <ol style="list-style-type: none"> a. Utilize Environmental Growth Funds and pursue additional funding for the acquisition and management of MHPA and other important community open space lands. b. Support the preservation of rural lands and open spaces throughout the region. c. Protect community urban canyons and other important open spaces that have been designated in community plans for the many conservation benefits they offer locally, and regionally as part of a collective citywide open space system (see also Recreation Element, Sections B and E; Urban Design Element, Section A). d. Minimize or avoid impacts to canyons and other environmentally sensitive lands, by relocating sewer infrastructure out of these areas where possible, minimizing construction of new sewer access roads into these areas, and redirection of sewage discharge away from canyons and other environmentally sensitive lands. e. Encourage the removal of invasive plant species and the planting of native plants near open space preserves. f. Pursue formal dedication of existing and future open space areas throughout the City, especially in core biological resource areas of the City’s adopted MSCP Subarea Plan. g. Require sensitive design, construction, relocation, and maintenance of trails to optimize public access and resource conservation. <p>CE-B.2. 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> <ol style="list-style-type: none"> a. Manage watersheds and regulate floodplains to reduce disruption of natural systems, including the flow of sand to the beaches. b. Limit grading and alterations of steep hillsides, cliffs and shoreline to minimize erosion and landform impacts. <p>CE-B.3. Use natural landforms and features as integrating elements in project design to complement and accentuate the City’s form (see Urban Design Element, Section A).</p> <p>UD-A.1. Preserve and protect natural landforms and features.</p> <ol style="list-style-type: none"> a. Protect the integrity of community plan designated open spaces (see also Conservation Element, Policy CE-B.1).

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	<p>b. Continue to implement the Multiple Species Conservation Program (MSCP) to conserve San Diego’s natural environment and create a linked open space system. Preserve and enhance remaining naturally occurring features such as wetlands, riparian zones, canyons, and ridge lines.</p> <p>UD-A.2. Use open space and landscape to define and link communities.</p> <p>a. Link villages, public attractions, canyons, open space and other destinations together by connecting them with trail systems, bikeways, landscaped boulevards, formalized parks, and/or natural open space, as appropriate.</p> <p>b. Preserve and encourage preservation of physical connectivity and access to open space.</p> <p>c. Recognize that open spaces sometimes prevent the continuation of transportation corridors and inhibit mobility between communities. Where conflicts exist between mobility and open space goals, site-specific solutions may be addressed in community plans.</p> <p>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>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>c. Utilize variable lot sizes, clustered housing, stepped-back facades, split-level units or other alternatives to slab foundations to minimize the amount of grading.</p> <p>d. Consider terraced homes, stepped down with the slope for better integration with the topography to minimize grading in sensitive slope areas.</p> <p>e. Utilize a clustered development pattern, single-story structures or single-story roof elements, or roofs sloped toward the open space system or natural features, to ensure that the visibility of new developments from natural features and open space areas are minimized.</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>i. Ensure that the visibility of new development from natural features and open space areas is minimized to preserve the landforms and</p>

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	<p>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 open space system could be used to determine compliance with this policy.</p> <ul style="list-style-type: none"> 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. m. Preserve views and view corridors along and/or into waterfront areas from the public right-of-way by decreasing the heights of buildings as they approach the shoreline, where possible. 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. <p>UD-A.4. Use sustainable building methods in accordance with the sustainable development policies in the Conservation Element.</p> <p>UD-A.5. Design buildings that contribute to a positive neighborhood character and relate to neighborhood and community context.</p> <ul style="list-style-type: none"> 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 proximate to commercial areas and residential neighborhoods that have a well established, distinctive character. 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.

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	<p>h. Acknowledge the positive aspects of nearby existing buildings by incorporating compatible features in new developments.</p> <p>i. Maximize natural ventilation, sunlight, and views.</p> <p>j. Provide convenient, safe, well-marked, and attractive pedestrian connections from the public street to building entrances.</p> <p>UD-A.6. Create street frontages with architectural and landscape interest to provide visual appeal to the streetscape and enhance the pedestrian experience.</p> <p>a. Locate buildings on the site so that they reinforce street frontages.</p> <p>b. Relate buildings to existing and planned adjacent uses.</p> <p>c. Ensure that building entries are prominent, visible, and well-located.</p> <p>d. Maintain existing setback patterns, except where community plans call for a change to the existing pattern.</p> <p>e. Minimize the visual impact of garages, parking and parking portals to the pedestrian and street façades.</p> <p>UD-A.7. Respect the context of historic streets, landmarks, and areas that give a community a sense of place or history. A survey may be done to identify "conservation areas" that retain original community character in sufficient quantity and quality but typically do not meet designation criteria as an individual historical resource or as a contributor to a historical district.</p> <p>a. Create guidelines in community plans to be used for new development, so that a neighborhood's historic character is complemented within the conservation areas where appropriate. (See also Historical Preservation Element, Policy HP-A.2.)</p> <p>b. Review the redevelopment of property within conservation areas to maintain important aspects of the surviving community character that have been identified as characteristics of a neighborhood that could be preserved.</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> <p>a. 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.)</p> <p>b. Encourage water conservation through the use of drought-tolerant landscape.</p> <p>c. Use landscape to support storm water management goals for filtration, percolation and erosion control.</p> <p>d. Use landscape to provide unique identities within neighborhoods, villages and other developed areas.</p> <p>e. Landscape materials and design should complement and build upon the existing character of the neighborhood.</p> <p>f. 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> <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</p>

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	<p>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. Consider landscaped areas as useable and functional amenities for people activities.</p> <p>l. Reduce barriers to views or light by selecting appropriate tree types, pruning thick hedges, and large overhanging tree canopies.</p> <p>m. 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> <p>UD-A.9. Incorporate existing and proposed transit stops or stations into project design. (See also Mobility Element, Policies ME-B.3 and ME-B.8.)</p> <ol style="list-style-type: none"> a. Provide attractively designed transit stops and stations that are adjacent to active uses and recognizable by the public. (See also Land Use Element, Policy LU-I.11.) b. Design safe, attractive, accessible, lighted, and convenient pedestrian connections from transit stops and stations to building entrances and street network. (See also Land Use Element, Policy LU-I.10.) c. Provide generous rights-of-way for transit, transit stops or stations. d. Locate buildings along transit corridors to allow convenient and direct access to transit stops/stations. <p>UD-A.10. Design or retrofit streets to improve walkability, bicycling, strengthen connectivity, transit integration, and 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.)</p> <p>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.)</p> <ol style="list-style-type: none"> a. Provide a tall, largely transparent ground floor along pedestrian active streets, functional for commercial uses. b. Design safe, functional, and aesthetically pleasing parking structures. c. Design structures to be of a height and mass that are compatible with the surrounding area. d. Use building materials, detailing and landscape that complement the surrounding neighborhood. e. Provide well-defined, dedicated pedestrian entrances. f. Use appropriate screening mechanisms to screen views of parked vehicles from pedestrian areas, and headlights from adjacent

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	<p>buildings.</p> <ul style="list-style-type: none"> g. Pursue development of parking structures that are wrapped on their exterior with other uses to conceal the parking structure and create an active streetscape. h. Encourage the use of attendants, gates, natural lighting, or surveillance equipment in parking structures to promote safety and security. <p>UD-A.12. Reduce the amount and visual impact of surface parking lots. (See also Mobility Element, Section G.)</p> <ul style="list-style-type: none"> a. Encourage placement of parking along the rear and sides of street-oriented buildings. 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. c. Design clear and attractive pedestrian paseos/pathways and signs that link parking and destinations. d. Locate pedestrian pathways in areas where vehicular access is limited. e. Avoid large areas of uninterrupted parking especially adjacent to community public viewsheds. 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 improve groundwater recharge. i. Use trees and other landscape to provide shade, screening, and filtering of storm water runoff in parking lots. j. Design surface parking lots to allow for potential redevelopment to more intensive uses. For example, through redevelopment, well-placed parking lot aisles could become internal project streets that provide access to future parking structures and mixed land uses. <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>UD-A.14. Provide comprehensive project sign plans to effectively utilize sign area.</p> <ul style="list-style-type: none"> a. Design signs as a means to communicate a unified theme and identity for the project.

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	<ul style="list-style-type: none"> 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 is necessary. d. Design signs to minimize negative visual impacts. <p>UD-A.15. Minimize the visual impact of wireless facilities.</p> <ul style="list-style-type: none"> a. Conceal wireless facilities in existing structures when possible, otherwise use camouflage and screening techniques to hide or blend them into the surrounding area. b. Design facilities to be aesthetically pleasing and respectful of the neighborhood context. c. Conceal mechanical equipment and devices associated with wireless facilities in underground vaults or unobtrusive structures. <p>UD-B.1. Recognize that the quality of a neighborhood is linked to the overall quality of the built environment. Projects should not be viewed singularly, but viewed as part of the larger neighborhood or community plan area in which they are located for design continuity and compatibility.</p> <ul style="list-style-type: none"> a. Integrate new construction with the existing fabric and scale of development in surrounding neighborhoods. Taller or denser development is not necessarily inconsistent with older, lower-density neighborhoods but must be designed with sensitivity to existing development. For example, new development should not cast shadows or create wind tunnels that will significantly impact existing development and should not restrict vehicular or pedestrian movements from existing development. b. Design new construction to respect the pedestrian orientation of neighborhoods. c. Provide innovative designs for a variety of housing types to meet the needs of the population. <p>UD-B.2. Achieve a mix of housing types within single developments (see also Land Use and Community Planning Element, Section H, and Housing Element).</p> <ul style="list-style-type: none"> a. Incorporate a variety of unit types in multifamily projects. b. Incorporate a variety of single-family housing types in single-family projects/subdivisions. c. Provide transitions of scale between higher-density development and lower-density neighborhoods. d. Identify sites for revitalization and additional housing opportunities in neighborhoods. <p>UD-C.1. In villages and transit corridors identified in community plans, provide a mix of uses that create vibrant, active places in villages.</p> <ul style="list-style-type: none"> a. Encourage both vertical (stacked) and horizontal (side-by-side) mixed-use development. b. Achieve a mix of housing types, by pursuing innovative designs to meet the needs of a broad range of households. c. Encourage placement of active uses, such as retailers, restaurants, services, cultural facilities and amenities, and various services, on the

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	<p>ground floor of buildings in areas where the greatest levels of pedestrian activity are sought.</p> <p>d. Encourage the provision of approximately ten percent of a project’s net site area as public space, with adjustments for smaller (less than ten acres) or constrained sites. Public space may be provided in the form of plazas, greens, gardens, pocket parks, amphitheaters, community meeting rooms, public facilities and services, and social services. (See also UD-C.5 and UD-E.1.)</p> <ol style="list-style-type: none"> 1. When public space is provided in the form of public parks in accordance with Recreation Element, Policy RE-F.9, the public park space may be used to meet population-based park requirements. 2. Where multiple property owners are involved in a village development, develop incentives or other mechanisms to help achieve equity in the distribution of development rights and the provision of public spaces. <p>e. Create new zoning categories for mixed-use development.</p> <ol style="list-style-type: none"> 1. Provide standards that address the particular design issues related to mixed-use projects, such as parking, noise attenuation and security measures, and minimize negative impacts on the community. 2. Provide standards that address bulk, mass, articulation, height, and transition issues such as the interface with surrounding or adjacent development and uses, and minimize negative impacts on the community. <p>f. Encourage location of mixed-use projects in transition areas and areas where small-scale commercial uses can fit into a residential neighborhood context.</p> <p>UD-C.2. Design village centers to be integrated into existing neighborhoods through pedestrian-friendly site design and building orientation, and the provision of multiple pedestrian access points.</p> <p>UD-C.3. Develop and apply building design guidelines and regulations that create diversity rather than homogeneity, and improve the quality of infill development.</p> <ol style="list-style-type: none"> a. Encourage distinctive architectural features to differentiate residential, commercial and mixed-use buildings and promote a sense of identity to village centers. <p>UD-C.4. Create pedestrian-friendly village centers (see also Mobility Element, Sections A and C).</p> <ol style="list-style-type: none"> a. Respect pedestrian-orientation by creating entries directly to the street and active uses at street level. b. Design or redesign buildings to include pedestrian-friendly entrances, outdoor dining areas, plazas, transparent windows, public art, and a variety of other elements to encourage pedestrian activity and interest at the ground floor level. c. Orient buildings in village centers to commercial local streets, or to internal project drives that are designed to function like a public street, in order to create a pedestrian-oriented shopping experience, including provision of on-street parking. d. Provide pathways that offer direct connections from the street to

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	<p>building entrances.</p> <ul style="list-style-type: none"> e. Break up the exterior facades of large retail establishment structures into distinct building masses distinguished by offsetting planes, rooflines and overhangs or other means. f. Where feasible, use small buildings in key locations to create a human scale environment in large retail centers. Incorporate separate individual main entrances directly leading to the outside from individual stores. <p>UD-C.5. Design village centers as civic focal points for public gatherings with public spaces. (See also UD-C.1 for village center public space requirements and UD-E.1 for the design of public spaces.)</p> <ul style="list-style-type: none"> a. Ensure public spaces are easily accessible and open to the public. The mechanisms used to provide the public space will vary as appropriate and could include, but are not limited to: land dedications, joint use agreements, and public access easements. Public space areas may include reasonable hours of use restrictions, demarcation of private and publicly accessible areas, and other signage to communicate public access rights, responsibilities and limitations. . b. Encourage provision of public space in the earliest possible phase of development, as determined by the public’s ability to use and access the space. <p>UD-C.6. Design project circulation systems for walkability.</p> <ul style="list-style-type: none"> a. Extend existing street grid patterns into development within existing fine-grained neighborhoods. b. Design a grid or modified-grid internal project street system, with sidewalks and curbs, as the organizing framework for development in village centers. c. Diagonal or “on-street” parallel parking may be appropriate along driveways in order to contribute to a “main street” appearance. d. Provide pedestrian shortcuts through the developments to connect destinations where the existing street system has long blocks or circuitous street patterns. e. Use pedestrian amenities, such as curb extensions and textured paving, to delineate key pedestrian crossings. f. Design new connections, and remove any barriers to pedestrian and bicycle circulation in order to enable people to walk or bike, rather than drive, to neighboring destinations (see also Mobility Element, Sections A and F). g. Lay out streets to take advantage of and maximize vistas into public viewsheds. h. Share and manage commercial, residential and public parking facilities where possible to manage parking for greater efficiency (see also Mobility Element, Section G). i. Incorporate design features that facilitate transit service along existing or proposed routes, such as bus pullout areas, covered transit stops, and multi-modal pathways through projects to transit stops. <p>UD-C.7. Enhance the public streetscape for greater walkability and neighborhood aesthetics. (see also UD-A.10 and Section F.)</p>

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	<ul style="list-style-type: none"> a. Preserve and enhance existing main streets. b. Establish build-to lines, or maximum permitted setbacks on designated streets. c. Design or redesign buildings to include architecturally interesting elements, pedestrian-friendly entrances, outdoor dining areas, transparent windows, or other means that emphasize human-scaled design features at the ground floor level. d. Implement pedestrian facilities and amenities in the public right-of-way including wider sidewalks, street trees, pedestrian-scaled lighting and signs, landscape, and street furniture. e. Relate the ground floor of buildings to the street in a manner that adds to the pedestrian experience while providing an appropriate level of privacy and security. f. Design or redesign the primary entrances of buildings to open onto the public street. <p>UD-C.8. Retrofit existing large-scale development patterns, such as “superblocks” or “campus-style” developments, to provide more and improved linkages among uses in the superblock, neighboring developments, and the public street system.</p> <ul style="list-style-type: none"> a. Coordinate the redesign of roads, sidewalks, and open spaces of adjacent developments. b. Locate new infill buildings in a manner that will promote increased pedestrian activity along streets and in public common areas. c. Implement exterior improvements such as public art, pedestrian-scale windows and entrances, signs, and street furniture. <p>UD-E.1. Include public plazas, squares or other gathering spaces in each neighborhood and village center (see also UD-C.1 and UD-C.5 for additional public space requirements in village centers, and UD-F.3 for policy direction on public art and cultural activities in public spaces).</p> <ul style="list-style-type: none"> a. Locate public spaces in prominent, recognizable, and accessible locations. b. Design outdoor open areas as “outdoor rooms,” developing a hierarchy of usable spaces that create a sense of enclosure using landscape, paving, walls, lighting, and structures. c. Develop each public space with a unique character, specific to its site and use. d. Design public spaces to accommodate a variety of artistic, social, cultural, and recreational opportunities including civic gatherings such as festivals, markets, performances, and exhibits. e. Consider artistic, cultural, and social activities unique to the neighborhood and designed for varying age groups that can be incorporated into the space. f. Use landscape, hardscape, and public art to improve the quality of public spaces. g. Encourage the active management and programming of public spaces. h. Design outdoor spaces to allow for both shade and the penetration of sunlight. i. Frame parks and plazas with buildings which visually contain and provide natural surveillance into the open space.

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	<p>j. Address maintenance and programming.</p> <p>UD-E.2. Treat and locate civic architecture and landmark institutions prominently.</p> <p>a. Where feasible, provide distinctive public open space, public art, greens and/or plazas around civic buildings such as courthouses, libraries, post offices and community centers to enhance the character of these civic and public buildings. Such civic and public buildings are widely used and should form the focal point for neighborhoods and communities.</p> <p>b. Incorporate sustainable building principles into building design (see also Conservation Element, Section A).</p> <p>c. Civic buildings at prominent locations, such as canyon rims, sites fronting open space, sites framing a public vista, and those affording a silhouette against the sky should exhibit notable architecture.</p> <p>d. Encourage innovative designs that distinguish civic and public buildings and landmarks from the surrounding neighborhood as a means of identifying their role as focal points for the community.</p> <p>e. Support the preservation of community landmarks.</p>
<p>Water Quality</p>	<p>Increasing on-site filtration. See the following Draft General Plan policy:</p> <p>CE-E.2. 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>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.</p> <p>c. Reduce the amount of impervious surfaces through selection of materials, site planning, and street design where possible.</p> <p>d. Increase the use of vegetation in drainage design.</p> <p>e. Maintain landscape design standards that minimize the use of pesticides and herbicides.</p> <p>f. Avoid development of areas particularly susceptible to erosion and sediment loss (e.g., steep slopes) and, where unavoidable, enforce regulations that minimize their impacts.</p> <p>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.</p> <p>h. Enforce maintenance requirements in development permit conditions.</p> <hr/> <p>Preserving, restoring or incorporating natural drainage systems into site design. See the following Draft General Plan policy:</p> <p>CE-E.2. 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</p>

San Diego General Plan PEIR Mitigation Monitoring and Reporting Program

Impact Area	Mitigation Framework
	<p>runoff.</p> <ol style="list-style-type: none"> a. Increase on-site infiltration, and preserve, restore or incorporate natural drainage systems into site design. 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 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.
	<p>Directing concentrated flows away from MHPA and open space areas. If not possible, drainage must be directed into sedimentation basins, grassy swales or mechanical trapping devices prior to draining into the MHPA or open space areas. See the following Draft General Plan policy:</p> <p>CE-E.2. 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> <ol style="list-style-type: none"> a. Increase on-site infiltration, and preserve, restore or incorporate natural drainage systems into site design. 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 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. <p>Reducing the amount of impervious surfaces through selection of materials, site planning,</p>

San Diego General Plan PEIR Mitigation Monitoring and Reporting Program

Impact Area	Mitigation Framework
	<p>and the narrowing of street widths, where possible. See the following Draft General Plan policy:</p> <p>CE-E.2. 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> <ol style="list-style-type: none"> a. Increase on-site infiltration, and preserve, restore or incorporate natural drainage systems into site design. 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 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.
	<p>Increasing the use of vegetation in drainage design. See the following Draft General Plan policy:</p> <p>CE-E.2. 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> <ol style="list-style-type: none"> a. Increase on-site infiltration, and preserve, restore or incorporate natural drainage systems into site design. 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 unavoidable, enforce regulations that minimize their impacts.

San Diego General Plan PEIR Mitigation Monitoring and Reporting Program

Impact Area	Mitigation Framework
	<ul style="list-style-type: none"> 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.
	<p>Maintaining landscape design standards that minimize the use of pesticides and herbicides. See the following Draft General Plan policy:</p> <p>CE-E.2. 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> <ul style="list-style-type: none"> a. Increase on-site infiltration, and preserve, restore or incorporate natural drainage systems into site design. 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 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. <p>To the extent feasible, avoiding development of areas particularly susceptible to erosion and sediment loss. See the following Draft General Plan policy:</p> <p>CE-E.2. 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> <ul style="list-style-type: none"> a. Increase on-site infiltration, and preserve, restore or incorporate natural drainage systems into site design. 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

San Diego General Plan PEIR Mitigation Monitoring and Reporting Program

Impact Area	Mitigation Framework
	<p>pesticides and herbicides.</p> <p>f. Avoid development of areas particularly susceptible to erosion and sediment loss (e.g., steep slopes) and, where unavoidable, enforce regulations that minimize their impacts.</p> <p>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.</p> <p>h. Enforce maintenance requirements in development permit conditions.</p>
Global Warming	<p>The City has undertaken the following actions to reduce the GHG emissions of future development under the General Plan and meet its obligations under CEQA to mitigate the cumulatively significant global warming impacts of the General Plan: (1) modified the policy language of the October 2006 General Plan (“General Plan”) to expand and strengthen climate change polices; (2) ensured that policies to reduce GHG emissions are imposed on future development and City operations; and (3) identified measures such as new or amended regulations, programs and incentives to implement the GHG reduction policies as part of a General Plan Action Plan. Key new Conservation Element policies include policy CE-A.2 is to “reduce the City’s carbon footprint” and to “develop and adopt new or amended regulations, programs and incentives as appropriate to implement the goals and policies set forth” related to climate change and policy CE-A.13 to “regularly monitor and update the City’s Climate Protection Action Plan (CE-A.13).” Strengthened policies that reduce the City’s carbon footprint through sustainable land use patterns, development and funding that supports alternative modes of transportation, improved energy efficiency in the transportation sector and in buildings and appliances, reducing the Urban Heat Island effect, and minimizing GHG emissions associated with landfills. The policy language of the General Plan also calls on the City to employ sustainable or “green” building techniques and self-generation of energy using renewable energy sources, minimize energy use through site design, building orientation, and tree-planting, eliminate the use of chlorofluorocarbon-based refrigerants, maximize waste reduction and diversion, and implement water conservation measures. See Draft General Plan policies identified in Table CE-1:</p>

**TABLE CE-1
Issues Related to Climate Change Addressed in the General Plan**

Issues	General Plan Policy		
	Element	Section	Policy
City of Villages Strategy	Conservation	A. Climate Change and Sustainable Development	CE-A.2
		B. Open Space and Landform Preservation	CE-B.1 through CE-B.5
	Land Use and Community Planning	A. City of Villages Strategy	LU-A.1 through LU-A.11
		H. Balanced Communities and Equitable Development	LU-H.6; LU-H.7
		I. Environmental Justice	LU-I.9 through LU-I.11
	Mobility	A. Walkable Communities	ME-A.1 through ME-A.9
		B. Transit First	ME-B.1 through ME-B.10
		F. Bicycling	ME-F.2; ME-F.4; ME-F.5
		K. Regional Coordination and Financing	ME-K.2; ME-K.6
	Urban Design	A. General Urban Design	UD-A.1; UD-A.2; UD-A.3; UD-A.9; UD-A.10

	Element	Section	Policy
		B. Distinctive Neighborhoods and Residential Design	UD-B.5d; UD-B.6
		C. Mixed-Use Villages and Commercial Areas	UD-C.1; UD-C.4; UD-C.6; UD-C.7
Greenhouse Gas (GHG) Emissions and Alternative Modes of Transportation	Conservation	A. Climate Change and Sustainable Development	CE-A.1; CE-A.2; CE-A.13
		F. Air Quality	CE-F.1 through CE-F.8
		J. Urban Forestry	CE-J.4
		N. Environmental Education	CE-N.3; CE-N.5
	Land Use and Community Planning	I. Environmental Justice	LU-I.11
	Mobility	A. Walkable Communities	ME-A.8; ME-A.9
		B. Transit First	ME-B.1; ME-B.8; ME-B.9; ME-B.10
		C. Street and Freeway System	ME-C.2e; ME-C.4c
		E. Transportation Demand Management	ME-E.1 through ME-E.8;
		G. Parking Management	ME-G.5
		F. Bicycling	ME-F.5
(GHG) (continued)	Urban Design	A. General Urban Design	UD.A-9; UD.A-10; UD-C.4; UD-C.7
Energy Efficiency	Conservation Element	A. Climate Change and Sustainable Development	CE-A.5; CE-A.6; CE-A.8; CE-A.9; CE-A.11; CE-A.13
		F. Air Quality	CE-F.2; CE-F.3
		I. Sustainable Energy	CE-I.1 through CE-I.13
	Urban Design	A. General Urban Design	UD-A.4; UD-A.5i
Urban Heat Island Effect	Conservation	A. Climate Change and Sustainable Development	CE-A.2; CE-A.6; CE-A.11; CE-A.12
		E. Urban Runoff Management	CE-E.2c; CE-E.d
		J. Urban Forestry	CE-J.1
	Recreation	F. Park and Recreation Guidelines	RE-F.8
Urban Design	A. General Urban Design	UD-A.8e; UD-A.12	
Waste Management and Recycling	Conservation	A. Climate Change and Sustainable Development	CE-A.2; CE-A.8; CE-A.9; CE-A.10
		C. Coastal Resources	CE-C.7
		D. Water Resources Management	CE-D.1; CE-D.3
		E. Urban Runoff Management	CE-E.6
		F. Air Quality	CE-F.3
		N. Environmental Education	CE-N.4; CE-N.5; CE-N.7
	Public Facilities, Services and Safety	F. Wastewater	PF-F.5
	I. Waste Management	PF-I.1 through PF-I.4	
Water Management and Supply	Conservation	A. Climate Change and Sustainable Development	CE-A.2
		D. Water Resources Management	CE-D.1; CE-D.2; CE-D.4
		I. Sustainable Energy	CE-I.4; CE-I.6
	Public Facilities, Services and Safety	H. Water Infrastructure	PF-H.1 through PF-H.3

CITY OF SAN DIEGO'S DRAFT GENERAL PLAN

FINAL

PROGRAM ENVIRONMENTAL IMPACT REPORT

APPENDICES A, B & C

Project No. 104495
SCH No. 2006091032
September 28, 2007

Appendix A:

NOP, Scoping Letter and Responses



THE CITY OF SAN DIEGO

DEVELOPMENT SERVICES DEPARTMENT

Date of Notice: September 7, 2006

PUBLIC NOTICE OF THE PREPARATION OF A DRAFT PROGRAM ENVIRONMENTAL IMPACT
REPORT AND PUBLIC NOTICE OF A SCOPING MEETING

JO: 6090

PUBLIC NOTICE: The City of San Diego will be the Lead Agency and will prepare a Program Environmental Impact Report (PEIR) in compliance with the California Environmental Quality Act (CEQA). This Notice of Preparation of a Program Environmental Impact Report and Scoping Meeting was publicly noticed and distributed on September 7, 2006.

SCOPING MEETINGS: Two scoping meetings will be held by the City of San Diego Land Development Review Division. One will be held on Wednesday, September 13, 2006, from 5:30 to 7:30 pm at the Mira Mesa Library, 8405 New Salem St., San Diego, CA 92126-2398, and the other meeting will be held on Monday, September 25, 2006 from 5:30 to 7:30 pm at the Valencia Park/Malcolm X Library, 5148 Market Street, San Diego, CA, 92114. Verbal and written comments regarding the scope and alternatives of the proposed Environmental Impact Report (EER) will be accepted at the meetings. Written comments may also be sent to Marilyn Mirrasoul, City of San Diego Development Services Center, 1222 First Avenue, MS 501, San Diego, CA 92101, or e-mailed to mmirrasoul@sandiego.gov referencing Project Number 104495 in the subject line within 30 days of the receipt of this notice (by October 7, 2006). A draft PEIR incorporating public input will then be prepared and distributed for public review and comment.

SUBJECT: General Plan Update: The City of San Diego General Plan Update is proposed to replace the existing 1979 *Progress Guide and General Plan* (1979 General Plan). The General Plan sets out a long-range, comprehensive framework for how the city will grow and develop, provide public services and maintain the qualities that define San Diego over the next 20-30 years. The proposed update has been guided by the City of Villages growth strategy and citywide policy direction contained within the General Plan Strategic Framework Element (adopted by the City Council on October 22, 2002) and would consolidate the existing thirteen elements in the 1979 *General Plan* into the following ten elements: Land Use and Community Planning; Mobility; Urban Design; Public Facilities, Services and Safety; Economic Prosperity; Recreation; Conservation; Historic Preservation; Noise; and, Housing (under separate cover).

Applicant: City Planning and Community Investment Department

PROJECT No. 104495 COMMUNITY PLAN AREA: All COUNCIL DISTRICT: All

Recommended Finding: Pursuant to Section 15060 (d) of the CEQA Guidelines, it appears that the proposed project could potentially result in significant environmental impacts in the following areas: Air Quality and Odor, Agricultural Resources, Biological Resources, Geologic Conditions, Growth Inducement, Health and Safety, Historical Resources, Hydrology, Land Use, Mineral Resources, Noise, Paleontological Resources, Public Services, Public Utilities, Transportation/Circulation/Parking, Visual Effects and Neighborhood Character, and Water Quality.

Availability in Alternative Format: To request the City's letter to the applicant detailing the required scope of work (EIR Scoping Letter) in alternative format, call the Development Services Department at (619) 446-5460 immediately to ensure availability. This information is ALSO available in alternative formats for persons with disabilities. To request this notice in alternative format, call (619) 446-5446 or (800) 735-2929 (TEXT TELEPHONE).

Additional Information: For environmental review information, contact Marilyn Mirrasoul at (619) 446-5380. For information regarding public meetings/hearings and/or other information regarding this project, contact the General Plan Update Acting Program Manager Nancy Bragado, at (619)533-4549 and/or the EIR Project Manager Randy Rodriguez at 619-533-4524. This notice was published in the San Diego Union Tribune and the San Diego Transcript, placed on City of San Diego websites (see below) and distributed on September 7, 2006.

<http://clerkdoc.sannet.gov/Website/publicnotice/pubnotcega.html>

<http://www.sandiego.gov/planning/genplan/index.shtml>

Robert J. Manis, Assistant Deputy Director
Development Services Department

DISTRIBUTION: For General Plan Update NOP of Draft EIR (September 7, 2006)
*** (Public Notice Only)**

City of San Diego

Mayor Sanders
Council President Peters, District 1
Councilmember Faulconer, District 2
Councilmember Atkins, District 3
Councilmember Young, District 4
Councilmember Maienschein, District 5
Councilmember Frye, District 6
Councilmember Madaffer, District 7
Councilmember Hueso, District 8
City Attorney, Shirley Edwards
Development Services Department (78, 78A)
Library Department (81) Balboa Branch Library (81B)
Beckwourth Branch Library (81C)
Benjamin Branch Library (81D)
Cannel Mountain ranch Branch (81E)
Carmel Valley Branch Library (81F)
City Heights/Weingart Branch Library (81G)
Clairemont Branch Library (81H)
College-Rolando Branch Library (81I)
Kensington-Normal Heights Branch Library (81K)
La Jolla/Riford branch Library (81L)
Linda Vista Branch Library (81M)
Logan Heights Branch Library (81N)
Malcolm X Library & Performing Arts Center (81O)
Mira Mesa Branch Library (81P)
Mission Hills Branch Library (81Q)
Mission Valley Branch Library (81R)
North Clairemont Branch Library (81S)
North Park Branch Library (81T)
Oak Park Branch Library (81U)
Ocean Beach Branch Library (81V)
Otay Mesa-Nestor Branch Library (81W)
Pacific Beach/Taylor Branch Library (81V)
Paradise Hills Branch Library (81Y)
Point Loma/Hervey Branch Library (81Z)
Rancho Bernardo Branch Library (81AA)
Rancho Penasquitos Branch Library (81BB)
San Carlos Branch Library (81DD)
San Ysidro Branch Library (81EE)
Scripps Miramar Ranch Branch Library (81FF)
Serra Mesa Branch Library (81GG)
Skyline Hills Branch Library (81HH)
Tierrasanta Branch Library (81II)
University Community Branch Library (81JJ)
University Heights Branch Library (81KK)
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Real Estate Assets Department (85)
Engineering and Capital Projects Department (86)
Historical Resources Board (87)
Park and Recreation Department (89)

Wetland Advisory Board (91 A)
Water Department (MS 908A)
Metropolitan Wastewater Department (MS 922)
Facilities Financing (MS 606F)
Park Development (93)
Environmental Services Department (93A)
San Diego Housing Commission (MS 49N)
City of San Diego Redevelopment Agency (MS 904)
Centre City Development Corporation (MS 51 D)
Southeastern Economic Development Corporation (SEDC) (MS 68)
Fire-Rescue Department, Samuel Oates, Fire Marshall (MS 603)
Governmental Relations Department (MS 51M)
Neighborhood Code Compliance (MS 51N)
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City Planning and Community Investment Department (MS 5A)

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Clairemont (274)
Navajo (337)
Peninsula (389)
Rancho Bernardo (399)
San Ysidro (435)
Scripps Ranch (442)

Other Cities

City of Chula Vista (94)
City of Coronado
City of Del Mar (96)
City of El Cajon (97)
City of Escondido (98)
City of Imperial Beach (99)
City of La Mesa (100)
City of Lemon Grove (101)
City of National City (102)
City of Poway (103)
City of Santee (104)
City of Solana Beach (105)

Federal Agencies

Federal Aviation Administration (1)*
Naval Facilities Engineering Command, SW Division, Environmental Planning (12)*
MCAS Miramar (13)*
U. S. Environmental Protection Agency (19)*
U. S. Fish and Wildlife Service (23)*
U. S. Army Corps of Engineers (26)*
U. S. Department of Agriculture (25)*

Native Americans

Ron Christman (215)*
Louie Guassac (215A)*
Clint Linton (215B)*
Kumeyaay Cultural Repatriation Committee (225)*
Native American Bands and Groups (225A - Q)*

State of California

CALTRANS, District 11 (33)*
Department of Fish and Game (32)*
Department of Parks and Recreation (40)*
Department of Parks and Recreation, Office of Historic Preservation (41)*
Resources Agency (43)*
Regional Water Quality Control Board, Region 9 (44)*
State Clearinghouse (46A)
California Coastal Commission (47)
Native American Heritage Commission (56)*
University of San Diego (251)
San Diego State University (455)
Malcolm A. Love Library (457)
University of California, San Diego (134)
San Diego Unified Port District (109)
California Integrated Waste Management Board (35)
California Environmental Protection Agency (37)
Housing and Community Development Department (38)
Department of Water Resources (45)*
California Boating and Waterways (52)*
California State Coastal Conservancy (54)*
Office of Planning and Research (57)*
California Energy Commission (59)*
California Department of Conservation (60)
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San Diego County

Department of Planning and Land Use (68)
County Water Authority (73)
Department of Environmental Health (75 & 76)
Department of Parks and Recreation (69)
Department of Agriculture (64)
Air Pollution Control District (65)
Department of Education (66)*
Department of Public Works (72)*

Other Agencies

San Diego Association of Governments (108)
San Diego Transit Corporation (112)
Sempra (114)
Metropolitan Transit Systems (115)
San Diego County Regional Airport Authority (110)
San Diego County Water Authority (73)
Local Agency Formation Commission (LAFCO) (111)
Otay River Park Joint Powers Authority
San Dieguito River Park Joint Power Authority (425A)

Community Groups, Associations, Boards, Committees and Councils

Community Planners Committee (194)
Otay Mesa - Nestor Planning Committee (228)
Otay Mesa Planning Committee (235)
Clairemont Mesa Planning Committee (248)
Greater Golden Hill Planning Committee (259)

Serra Mesa Planning Group (263A)
Kearny Mesa Community Planning Group (265)
Linda Vista Community Planning Committee (267)
La Jolla Community Planning Association (275)
City Heights Area Planning Committee (287)
Kensington-Talmadge Planning Committee (290)
Normal Heights Community Planning Committee (291)
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Midway Community Planning Advisory Committee (307)
Mira Mesa Community Planning Group (310)
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Peninsula Community Planning Board (390)
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San Ysidro Planning and Development Group (433)
Scripps Ranch Community Planning Group (437)
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Skyline - Paradise Hills Planning Committee (443)
Torrey Hills Community Planning Board (444A)
Southeastern San Diego Planning Committee (449)
Encanto Neighborhoods Community Planning Group (449A)
College Area Community Council (456)
Tierrasanta Community Council (462)
Torrey Pines Community Planning Group (469)
University City Community Planning Group (480)
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Clairemont Town Council (257)
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Kearny Mesa Town Council (263)
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Marian Bear Natural Park Recreation Council (267 A)
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Oak Park Community Council (298)
Webster Community Council (301)
Marshall Community Council (304)
Darnell Community Council (306)
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Mission Beach Town Council (326)
Mission Hills Association (327)
Mission Valley Community Council (328 C)
San Carlos Area Council (338)
North Park Community Association (366)
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Pacific Beach Town Council (374)
Rancho Penasquitos Community Council (378)Rancho Bernardo Community Council, Inc. (398)
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Rancho Penasquitos Town Council (383)
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Skyline/Paradise Hills Planning Committee (443)
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Southeastern San Diego Development Committee (449)
Encanto Neighborhoods Community Planning Group (449 A)
Skyline/Paradise Hills Planning Committee (443)
Sorrento Hills Community Planning Board (444 A)
Southeastern San Diego Development Committee (449)
Encanto Neighborhoods Community Planning Group (449 A)
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Scripps Ranch Civic Association (440)
Murphy Canyon Community Council (463)
Torrey Pines Association (472)
Crest Canyon Citizens Advisory Committee (475)
University City Community Association (486)
Hillside Protection Association (501)
Allen Canyon Committee (504)

Other Interested Parties

San Diego Apartment Association (152)*
San Diego Chamber of Commerce (157)
Building Industry Association/Federation (158)
San Diego River Park Foundation (163)*
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San Diego Natural History Museum (166)*
San Diego Audubon Society (167, 167A)*
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Dr. Jerry Schaefer (208A)*
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Friends of Rose Canyon (386)*
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Sweetwater Union High School District (131)*
San Diego City Schools (132)
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General Plan E-mail Distribution List (All of those listed below received the public notice via e-mail.)

ACCORD (Center on Policy Initiatives, environmental interest groups, and San Diego Labor Council)
Association of Environmental Professionals (AEP)
BioCom
Bicycle Coalition representatives
Center on Policy Initiatives
Community Forest Advisory Board (90)
Community Planners Advisory Committee on Transportation (COMPACT)
Council of Design Professionals
Economic Research Associates
Industrial Environmental Association (IEA)
Kiwanis Club of Old San Diego
Manager's Parking Task Force
National Association of Industrial and Office Properties (NAIOP)
New School of Architecture & Design
Park and Recreation Board
Pedestrian Master Plan Working Group
Redevelopment Project Area Committee Chairs
San Diego Highway Development Association
San Diego Housing Federation
San Diego Organizing Project
San Diego Port Tenants Association
San Diego Regional Economic Development Corporation (EDC)
San Diego Unified Port District representatives
San Diego Workforce Partnership
Science and Technology Commission
Small Business Advisory Board
Society of American Military Engineers
Society of Architecture and Engineering
Technical Advisory Board for Development Services
Uptown Partnership (Parking Summit)
Urban Council
U.S. Green Building Council
Walk San Diego Representatives
City of San Diego Planning Department Housing Issues Interest List



THE CITY OF SAN DIEGO

September 7, 2006

Mr. Bill Anderson, Director
City Planning and Community Investment Department
202 C Street, MS 4A
San Diego, CA 92101

Subject: Scope of Work for a Program Environmental Impact Report (PEIR) for the General Plan Update (Project No. 104495)

Dear Mr. Anderson:

Pursuant to Section 15060(d) of the California Environmental Quality Act (CEQA), the Environmental Analysis Section (EAS) of the City's Development Services Department has determined that the proposed project may have significant effects on the environment, and the preparation of an Environmental Impact Report (EIR) is required. Staff has determined that a program EIR (PEIR) is the appropriate environmental document for this project because the General Plan Update can be characterized as one large project that governs the interconnected and continued planning of the entire City.

The purpose of this letter is to identify the specific issues to be addressed in the PEIR. The PEIR should be prepared in accordance with the attached "City of San Diego Technical Report and Environmental Impact Report Guidelines" (Updated May 2005). A Notice of Preparation will be distributed to the Responsible Agencies and others who may have an interest in the project. Changes or additions to the scope of work may be required as a result of input received in response to the Notice of Preparation.

The Notice of Preparation will also include an announcement of the date of a scoping meeting which will be held to allow interested parties to help define the scope of the PEIR or, in other words, comment on the issues they believe should be included within the PEIR. Scoping meetings are required by CEQA Section 21083.9 (a) (2) for projects that may have statewide, regional or area-wide environmental impacts. The City's environmental review staff has determined that this project meets this threshold. Two scoping meetings will be held by the City of San Diego Land Development Review Division. One will be held on Wednesday, September 13, 2006, from 5:30 to 7:30 pm at the Mira Mesa Library, 8405 New Salem St., San Diego, CA 92126-2398, and the other meeting will be held on Monday, September 25, 2006 from 5:30 to 7:30 pm at the Valencia Park/Malcolm X Library, 5148 Market Street, San Diego, CA, 92114.

The project that will be the subject of the PEIR is briefly described as follows:

Project Location: The General Plan Update encompasses the entire City of San Diego (Please see Figure 1).



Development Services

1222 First Avenue, MS 501 • San Diego, CA 92101-4155

Tel (619) 446-5460

Proposed Project:

On October 22, 2002, the City Council adopted the Strategic Framework Element as an amendment to the City's 1979 *Progress Guide and General Plan*. This action initiated the comprehensive update of the 1979 Progress Guide and General Plan. The Strategic Framework Element provided a new strategy for the City's future growth and development, a basis for a new Land Use Element, and a general policy framework for updating the existing elements in the General Plan.

California requires each city and county to adopt a general plan to guide the growth and development of a community, usually over a twenty-year horizon. A general plan provides the basis for local government decision making particularly related to legislative and regulatory land use and development, serves as a vehicle for citizens to participate in planning and decision-making for the community, and establishes the ground rules, to be easily understood by everyone, regarding how and where a community can grow. The state mandates the inclusion of seven elements: land use, circulation, housing (updated every five years), conservation, open space, noise, and safety. Interrelated and of equal status, each of the elements is an integral part of the General Plan. Elements can be combined, however, and the existing thirteen elements in the 1979 *Progress Guide and General Plan* together with the Guidelines for Future Development were combined and reduced to ten: Strategic Framework and Land Use and Community Planning; Mobility; Urban Design; Economic Prosperity; Public Facilities, Services, and Safety; Recreation; Conservation; Historic Preservation; Noise; and Housing (under separate cover, and evaluated separately).

Introductory Sections

A new Strategic Framework section is proposed as an introduction to the General Plan. This section includes the Vision and Core Values adopted as a part of the Strategic Framework Element, and provides a summary of each of the ten elements of the General Plan.

Land Use and Community Planning Element

The proposed new Land Use and Community Planning Element (Land Use Element) incorporates the adopted Strategic Framework Element City of Villages strategy and provides policy direction in the areas of community planning, zoning and policy consistency, plan amendment process, coastal planning, airport land use planning, balanced communities, equitable development, environmental justice, and annexations. The element includes the General Plan Land Use and Street Systems Map, a generalized land use and streets composite map based upon adopted community plans.

The City of Villages strategy is a major component of the Land Use Element. This strategy calls for new growth to be targeted in mixed-use village centers in order to create lively activity centers, provide housing, improve walkability, help support a state-of-the-art transit system, and provide an alternative to the development of outlying areas. Combined with the citywide

policies, the strategy helps to ensure that growth and redevelopment will contribute towards long-term healthy environmental, social, and economic conditions within the city and its communities.

In addition, the Land Use Element clarifies the roles of the General Plan and community plans and their relationships. It establishes community plans as integral components of the General Plan, as the community plans provide the parcel-level detail regarding land use designations, density and intensity that is required by state law. Further, Land Use Element policies require that all projects conform to community plan policies, and that zoning is established which is consistent with the community plan.

Mobility Element

An overall goal of the Mobility Element is to further the attainment of a balanced, multi-modal transportation network that improves mobility and minimizes environmental and neighborhood impacts. The element includes a wide range of policies which advance a strategy for congestion relief and increased transportation choices in a manner that strengthens the City of Villages land use vision. The Mobility and Land Use Elements of the draft General Plan are closely linked. The Land Use Element identifies existing and planned land uses, and the Mobility Element identifies the proposed transportation network and strategies which have been designed to meet the future transportation needs generated by the land uses.

Urban Design Element

The purpose of the Urban Design Element is to establish a set of design principles from which future physical design decisions can be based. Urban design is the visual and sensory relationship between people and the built environment. The built environment includes not only buildings and streets, but also the natural environment as it is incorporated into the urban context. Urban design describes the physical features which define the character or image of a street, neighborhood, community, or the city as a whole. The Urban Design Element contains policies that are intended to be responsive to the core values and recommendations on urban form identified in the Strategic Framework Element. These include allowing the City's urban form to be defined and shaped by the natural environment, and creating diverse village centers where commercial and residential development is concentrated.

The policies continue the 1979 General Plan's emphasis on respecting San Diego's natural topography and distinctive neighborhoods, and incorporate components of the city's Transit-Oriented Development Design Guidelines. New sections are proposed on Public Art and Cultural Amenities, and Safety and Security.

Recreation Element

The Recreation Element contains policies which are intended to result in increased and enhanced public recreation opportunities and facilities throughout the City of San Diego for all users.

The Recreation Element is divided into six issue areas containing goals and policies addressing: 1) public access and recreational opportunities; 2) preservation of existing recreational facilities, and cultural, historic and open space resources; 3) accessibility of facilities and services; 4) cooperative efforts to attain parkland and facilities; 5) preservation and management of open space and resource-based parks; and 6) guidelines for the provision of park and recreation facilities.

Economic Prosperity

This draft element proposes a balanced approach to economic prosperity through both economic diversity and protection of industries which contribute the most to the local economy. It emphasizes the importance of maintaining a diversity of industries in creating a stable economy but focuses on the manufacturing, research and development, and support functions since they are base-sector industries which also produce needed middle-income employment. Base sector industries bring new wealth to the area by exporting goods and intellectual property. In San Diego, the economic base is primarily composed of industries in the manufacturing, visitor industries, and national security and international relations sectors or subsectors. Manufacturing, research and development, technology services, and support uses are the key to providing middle-income employment.

Conservation Element

The Conservation Element focuses on conserving natural resources; protecting unique landforms; preserving and managing open space systems, beaches and watercourses; preventing and reducing pollution; and ensuring preservation of quality of life in San Diego. A wide range of policies are proposed in the General Plan update to help guide development and provide a conservation "blueprint" so that San Diego's environmental quality and natural resources are preserved, maintained, improved and can be sustained for current and future generations. Many of the policies described in the element are already being implemented throughout the city, via specific programs and plans administered by various city departments, such as the Storm Water Pollution Prevention Program, the Sustainable Communities Program, and the Multiple Species Conservation Program (MSCP). The General Plan provides the broad overall context to view the purpose and interrelationships of these and additional programs, and to establish citywide goals for conservation of resources that will be refined based on individual community's conservation goals.

Historic Preservation Element

The purpose of the Historic Preservation Element is to guide the preservation, protection and restoration of historical and cultural resources so that a clear sense of how the city gained its present form and substance can be maintained. Preservation of important historical resources enhances the quality of life in San Diego. It improves the quality of the built environment,

encourages appreciation for the city's history and culture, maintains the character and identity of communities, and contributes to the city's economic vitality. Related policies addressing cultural heritage tourism are included in the Economic Prosperity Element.

Noise Element

The Noise Element provides goals and policies to guide compatible land uses and the incorporation of noise abatement measures for new uses to protect people living and working in the city of San Diego from an excessive noise environment. This purpose becomes more relevant as the city continues to grow with infill, mixed use, and transit-oriented development. Recent revisions to the element include expanded Land Use - Noise Compatibility Guidelines that use a matrix to identify compatible, conditionally compatible, and incompatible land uses by noise decibel level.

Public Facilities, Service and Safety Element

The need to improve existing infrastructure deficiencies in San Diego's older urbanized communities is one of the most pressing and persistent issues faced by the city of San Diego. The city must also ensure that adequate facilities and levels of service are maintained over time throughout the city, and that new growth pays its fair share of costs. The Public Facilities, Service and Safety Element provides a public facilities financing approach oriented to infill development that was not included in the 1979 General Plan.

Facilities and services addressed include: Fire-Rescue, Police, Wastewater, Storm Water, Water Infrastructure, Waste Management, Libraries, Schools, Information Infrastructure, Disaster Preparedness, and Seismic Safety. The policies within the PFSSE also apply to transportation and park and recreation facilities and services, with additional guidance found in other elements. In addition, policies calling for greater collaboration with providers of Public Utilities, Regional Facilities, and Healthcare Facilities are included in this element, as they too affect land uses and overall quality of life.

The proposed sections of the draft General Plan Update can be found at the following web site: <http://www.sandiego.gov/planning/genplan/index.shtml>

Discretionary Approvals: The proposed project would require City Council approval.

I. PEIR Requirements

Each section and discussion area of the PEIR must provide a descriptive analysis of the project followed by an objective and comprehensive evaluation. The Draft PEIR must also include sufficient graphics and tables to provide a complete description. Please refer to the "Environmental Impact Report Guidelines," Updated May 2005, for additional details regarding the required information.

A. Introduction:

Introduce the project with a brief discussion of the intended use and purpose of the PEIR. Briefly describe the project and the necessity for any subsequent discretionary City actions/permits and any other local, state and/or federal approvals. Discuss how the PEIR may be used as the basis for subsequent approvals and/or environmental documents. Describe the parameters for the future use of the PEIR.

B. Environmental Setting:

Describe the physical features of the City and the regional setting. The intensification of land uses could increase the demand on existing and planned public services and facilities. Discuss the project's effect on the need for public facilities. Discuss the Fire Department's six-minute response time for fire crews and equipment, and the eight-minute emergency services response time, and the Police Department's goal of a seven-minute response time for priority calls.

C. Project Description:

Discuss the characteristics, goals, and objectives of the General Plan Update. Explain how the public would benefit from the project. Discuss how the GPU will address the provision of affordable housing. Describe the discretionary action(s) involved in the project. List and explain the requirements for approvals from federal, state, and local agencies.

D. History of Project Changes:

Chronicle the changes that have been made to the project in response to environmental concerns raised during the development of the plan, including any input received from the Planning Commission and Council committees.

II. Environmental Issues

The draft PEIR must include a complete discussion of the existing conditions, impact analysis, significance, and mitigation for all the environmental issue sections. The PEIR must represent the independent analysis of the Lead Agency. All impact analyses must be based on the City's current "Significance Determination Thresholds." Any technical reports must be included in the appendices to the PEIR and summarized in the text of the document. The GPU does not propose any land use designation changes; however, it is understood that subsequent actions may do so, and may result in significant environmental impacts. While it is likely that some of the impacts may be fully or partially mitigated, at the GPU level of review the potential future impacts are considered not fully mitigated.

Land Use

Issue 1: Would implementation of the GPU conflict with any adopted environmental plans, including applicable habitat conservation plans?

Issue 2: Would the implementation of the GPU conflict with adopted community plans, land use designations or any other applicable land use plans, policies or regulations of State or Federal agencies with jurisdiction over the City? Would the implementation of the GPU require the amendments to community plans?

Issue 3: Would the implementation of the GPU be consistent with the density calculations, design standards, use restrictions and any other development regulations of the City's Land Development Code related to the applicable zoning regulations?

Issue 4: Would the implementation of the GPU result in land uses that are not compatible with any applicable Airport Land Use Plans?

Discuss how the implementation of the GPU would directly or indirectly affect the City's community plans, and all other applicable environmental, and land development regulations. If there are potential impacts, describe whether or not these potential impacts would lead to physical effects.

Transportation/Traffic Circulation/Parking

Issue 1: What direct and/or cumulative traffic impacts would the GPU have on existing and planned community, and regional circulation networks?

Issue 2: Would implementation of the GPU result in any alterations to existing circulation?

Issue 3: Would implementation of the GPU impact the availability of parking?

Issue 4: Would the implementation of the GPU encourage the provision of alternative modes of travel?

Describe in this section any envisioned modifications and/or improvements to the existing circulation system, including City streets, intersections, freeways and interchanges. Discuss any potential traffic impacts within individual community plan areas. Describe whether or not the GPU would result in a substantial increase in trips associated with build-out. If applicable, describe what measures the GPU would include to mitigate significant traffic circulation impacts, and/or parking shortages. Discuss how potential change in uses would affect overall traffic patterns and congestion. Address cumulative traffic impacts including any regional impacts. Describe how alternative modes of travel would be addressed.

Visual Effects and Neighborhood Character

Issue 1: Would the implementation of the GPU result in a substantial change in the topography or ground surface relief features of any areas of the City?

Issue 2: Would the implementation of the GPU result in the blockage of public views from designated open space areas, roads, or to any significant visual landmarks or scenic vistas?

Issue 3: Would the implementation of the GPU affect the existing visual character of the City or community plan areas, particularly with respect to views from major roadways and public viewing areas?

Issue 4: Would implementation of the GPU result in projects with a bulk, scale, materials, or style that would be incompatible with the surrounding development or community?

Issue 5: Would the implementation of the GPU result in projects that would substantially alter the existing character of existing individual communities and/or the City?

Issue 6: Would the implementation of the GPU result in projects with negative aesthetics?

Issue 7: Would the implementation of the GPU result in projects that would substantially shade other properties or produce substantial amounts of light and glare?

This section should evaluate whether or not the GPU would result in a potential change in the visual environment. Address any potential visual impacts from public vantage points.

Describe how the neighborhood character and community-specific guidelines of the City's communities would be affected by the implementation of the General Plan Update. Would the project result in a homogenous style of architecture over the City or would varied architectural designs be encouraged?

Air Quality

Issue 1: Would implementation of the GPU result in an increased number of automobile trips which could potentially affect San Diego's ability to meet regional, state and federal clean air standards?

Issue 2: Would implementation of the GPU result in air emissions that would substantially deteriorate ambient air quality, including the exposure of sensitive receptors to substantial pollutant concentrations?

Discuss whether or not the GPU would result in an increase in the number of automobile trips within the City. An increase in auto emissions has the potential to affect air quality. Describe the climatological setting within the San Diego Air Basin and the basin's current attainment levels for State and Federal Ambient Air Quality Standards. Discuss short- and long-term and cumulative impacts on regional air quality, including construction and transportation-related sources of air pollutants. Discuss the impacts from any increase in trips to the Regional Air Quality Standards, and the overall air quality impacts from such trips, and any proposed mitigation measures. Discuss whether or not the implementation of the GPU would result in a significant decrease in the levels of service of any roadway or intersection and the resulting degradation of air quality.

Noise

Issue 1: Would the implementation of the GPU subject residential, recreational-use areas or other sensitive receptors to future traffic noise levels which would exceed the standards established in the Transportation Element of the General Plan?

Issue 2: Would the implementation of the GPU result in exposure of sensitive receptors to future noise levels which exceed those established in the adopted Airport Comprehensive Land Use Plans?

Issue 3: Would the implementation of the GPU be consistent with the City's adopted noise ordinance (Municipal Code) and Significance Thresholds for noise or would incompatible uses be sited adjacent to one another?

Issue 4: Would the implementation of the GPU result in a significant increase in the existing ambient noise levels?

The GPU proposes a change in the Land Use Compatibility Chart. Describe the potential environmental effects of this change. If a significant increase in existing ambient noise levels would be anticipated describe the appropriate mitigation.

Biological Resources

Issue 1: Would the implementation of the GPU result in the reduction in the number of any unique, rare, endangered, sensitive, or fully protected species of plants or animals?

Issue 2: Would the implementation of the GPU result in impacts to important habitat or result in interference with the movements of resident or migratory fish or wildlife species?

Issue 3: Would the implementation of the GPU affect the long-term conservation of biological resources? Would the GPU impact the Multi-Habitat Planning Area (MHPA)?

Issue 4: Would the revised Land Use Compatibility Chart result in noise impacts on sensitive species?

Discuss how any proposed land use changes within the GPU would impact the City's biological conservation goals either directly or indirectly. Describe how the Conservation Element would affect those goals.

Health and Safety

Issue 1: Are any land use changes proposed by the GPU that would result in the exposure of people/sensitive receptors to potential health hazards (i.e. exposing sensitive receptors to hazardous materials in Industrial areas)?

Describe whether or not the implementation of any proposed land uses or other changes would result in the increased or decreased exposure of sensitive receptors to hazardous materials.

Historical Resources

Issue 1: Would the implementation of the GPU adversely affect prehistoric or historic archaeological sites?

Issue 2: Would the implementation of the GPU result in adverse physical or aesthetic effects to prehistoric or historic buildings, structures, objects, or sites?

Issue 3: Would the implementation of the GPU result in adverse physical or aesthetic effects to architecturally significant buildings, structures, or objects?

Issue 4: Would the implementation of the GPU result in impacts to existing religious or sacred uses within the City or the disturbance of any human remains, including those interred outside formal cemeteries?

Describe whether or not the implementation of the GPU would negatively affect the preservation of archaeological or historical resources. While the GPU contains elements that would encourage preservation other GPU elements have different goals. Explain how competing goals would be resolved.

Hydrology

Issue 1: Would the implementation of the GPU result in an increase in impervious surfaces, increased runoff, and substantial alteration to existing drainage patterns?

Address any anticipated changes to existing drainage patterns and runoff volumes that may result with the implementation of the GPU.

Geologic Conditions

Issue 1: Would the implementation of the GPU result in the exposure of people or property to geologic hazards such as earthquakes, landslides, mudslide, ground failure, or similar hazards?

Issue 2: Would the implementation of the GPU result in a substantial increase in wind or water erosion of soils, either on or off the site?

The PEIR should include a discussion of the potential to aggravate or intensify the wind and water erosion or expose people or property to geologic hazards.

Paleontological Resources

Issue 1: Would the implementation of the GPU result in the loss of paleontological resources?

The PEIR should include a discussion of the potential for loss of sensitive paleontological resources in conjunction with the implementation of the GPU.

Public Services and Facilities

Issue 1: Would the implementation of the GPU result in the provision of additional public facilities? If so, would the construction of these public facilities cause significant environmental impacts?

Discuss whether or not the construction of public facilities would result in significant environmental impacts.

Public Utilities

Issue 1: Would the implementation of the GPU result in the need for new or expanded public facilities including those necessary for water, sewer, storm drains, solid waste disposal, and the provision of energy? If so, would the construction of these facilities cause significant environmental impacts?

Issue 2: Would the implementation of the GPU result in the use of excessive amounts of electrical power, fuel or other forms of energy?

Issue 3: Would the implementation of the GPU result in the use of excessive amounts of water?

Describe any measures/policies of the GPU which could potentially reduce the use of energy and water. Present measures included as part of the project or proposed as mitigation measures directed at conserving energy and reducing energy consumption consistent. Ensure this section addresses all

issues described within Appendix F of CEQA.

In the Existing Conditions section of this issue area, address water supply availability consistent with Senate Bill 610/221.

Discuss how the implementation of the GPU would affect the City's ability to handle solid waste. According to Assembly Bill 939, the City of San Diego is required to divert at least 50 percent of its solid waste from landfill disposal through source reduction, recycling, and composting by 2000.

Water Quality

Issue 1: Would the implementation of the GPU increase the amount of impervious surface in the City? Would the implementation of the GPU result in substantial alteration of on and offsite drainage patterns affecting the rate and volume of surface runoff within the City?

Issue 2: Would the implementation of the GPU result in an increase in pollutant discharge to receiving waters and increase discharge of identified pollutants to an already impaired water body?

Issue 3: How would the implementation of the GPU impact local and regional water quality?

Discuss whether or not the implementation of the GPU would have any potential impacts on regional and local water quality.

Agricultural Resources

Issue 1: Would the implementation of the GPU result in the conversion of agricultural lands to nonagricultural use or impair the agricultural productivity of agricultural lands?

Discuss whether or not the implementation of the GPU would result in the conversion of substantial amounts of Prime Farmland, Unique Farmland, or Farmland of Statewide Importance.

Mineral Resources

Issue 1: Would the project result in the loss of significant mineral resources (e.g. sand and gravel) that would be of value to the region and residents of the state?

The PEIR should explain to what extent implementation of the GPU could result in the loss of availability of mineral resources and state whether a cumulative impact would result.

Growth Inducement

Issue 1: Would the implementation of the GPU foster economic or population growth, or the construction of additional housing either directly or indirectly?

Address the potential for growth inducement through implementation of the GPU. Accelerated growth could further strain existing community facilities or encourage activities that could significantly affect the environment. It must not be assumed that growth is necessarily beneficial, detrimental or of little significance to the environment.

Cumulative Impacts

Issue 1: What are the cumulative impacts of this project?

Implementation of the GPU could result in significant environmental changes, which are individually limited but cumulatively considerable. Therefore, in accordance with Section 15130 of the CEQA Guidelines, potential cumulative impacts must be discussed in a separate section of the PEIR.

Other

In conformance with CEQA Section 15126.2(b) and (c), discuss the significant environmental effects which cannot be avoided if the GPU is implemented; and the significant irreversible changes that would result from the implementation of the GPU.

New Information/Project Amendments

If the project description changes, and/or supplementary information becomes available, the PEIR may need to be expanded to include additional issue areas. This must be determined in consultation with EAS staff.

Alternatives:

The PEIR must place major attention on reasonable feasible alternatives that avoid or mitigate the project's significant impacts. These alternatives should be identified and discussed in detail and should address all significant impacts. The alternatives analysis should be conducted in sufficient graphic and/or narrative detail to clearly assess the relative level of impacts and feasibility. See Section 15364 of the CEQA Guidelines for the CEQA definition of "feasible."

Preceding the detailed alternatives analysis, provide a section entitled "Alternatives Considered but Rejected." This section should include a discussion of preliminary alternatives that were considered but not analyzed in detail. The reasons for rejection must be explained in detail and demonstrate to the public the analytical route followed in rejecting certain alternatives.

The following alternatives must be considered for evaluation in the draft PEIR:

- A. No Project:** This alternative should describe a scenario that would continue the utilization of the existing 1979 General Plan, the Strategic Framework Element (as adopted by City Council without increased density), and community plans to guide future development in the City for the next 20-30 years.
- B. City of Villages Growth:** This alternative should evaluate the impacts of adding 17,000 to 37,000 multifamily dwelling units forecasted for the year 2030 for the City into the General Plan Update (as evaluated in the 2002 Strategic Framework Final EIR) in areas that have a propensity to develop village characteristics.
- C. General-Citywide Growth:** This alternative should evaluate the impacts of adding 17,000 to 37,000 multifamily dwelling units forecasted for the year 2030 for the City into the General Plan Update, similar to the City of Villages Growth Alternative, but the anticipated

growth would be spread equally throughout every community in the City resulting in smaller villages.

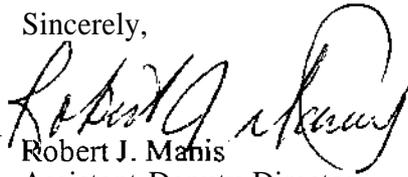
D. No Prime Industrial Lands: This alternative should describe a scenario that would not designate any lands within the City of San Diego as "prime industrial" lands.

E. No Reduction in Noise Standards: This alternative should describe the implementation of the proposed GPU without either of the proposed General Plan policies which would allow up to 70 dBA within the Airport Influence Area and 75 dBA elsewhere for multiple-family residences.

If through the environmental analysis process, other alternatives become apparent which would mitigate potentially significant impacts these alternatives must be discussed with EAS staff prior to including them in the PEIR. Note that the final formulation of alternatives may not conclude until late in the process, after staff has determined which project impacts are significant. It is important to emphasize that the alternatives section of the PEER should constitute a major part of the report. The timely processing of the environmental review will likely be dependent on the thoroughness of effort exhibited in the alternatives analysis.

Until a screen check PEIR is submitted which addresses all of the above issues, the environmental processing timeline for this project will be held in abeyance. If you have any questions or need clarification regarding the content of this letter, please contact Marilyn Mirrasoul, Associate Planner at (619) 446-5380.

Sincerely,

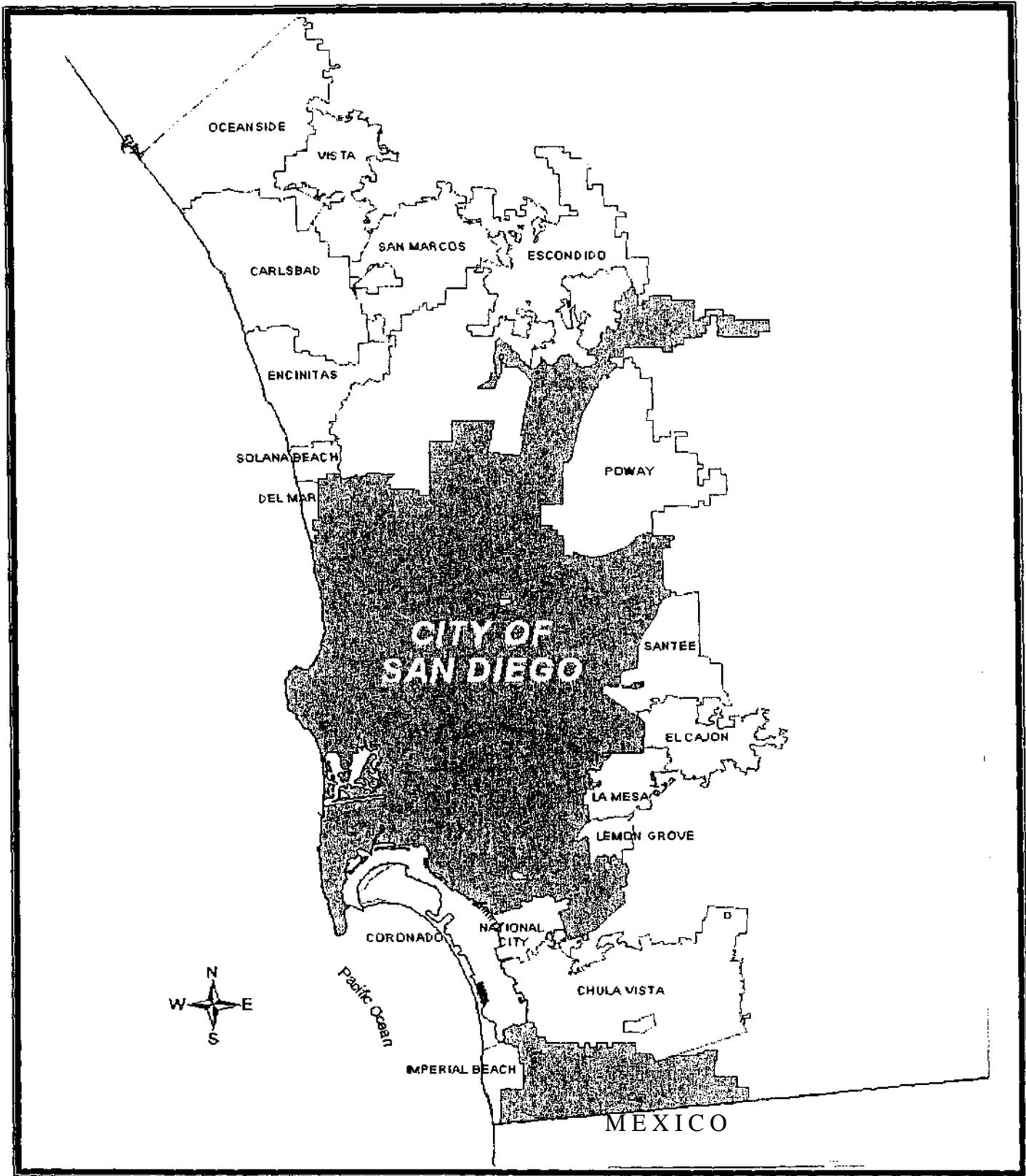


Robert J. Manis
Assistant Deputy Director
Development Services Department

RM/mm

Attachments: Figure 1, Location Map

cc: Nancy Bragado, General Plan Update Program Manager
Randy Rodriguez, EIR Project Manager
Eileen Lower, Senior Planner
Marilyn Mirrasoul, Associate Planner
EAS File
EAS Seniors



Location Map - General Plan Update
 Environmental Analysis Section Project No. 104495
 CITY OF SAN DIEGO • DEVELOPMENT SERVICES

Figure
1



Arnold Schwarzenegger
Governor

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



Sean Walsh
Director

Notice of Preparation

September 8, 2006

To: Reviewing Agencies

Re: General Plan Update
SCH# 2006091032

Attached for your review and comment is the Notice of Preparation (NOP) for the General Plan Update draft Environmental Impact Report (EIR).

Responsible agencies must transmit their comments on the scope and content of the NOP, focusing on specific information related to their own statutory responsibility, within 30 days of receipt of the NOP from the Lead Agency. This is a courtesy notice provided by the State Clearinghouse with a reminder for you to comment in a timely manner. We encourage other agencies to also respond to this notice and express their concerns early in the environmental review process.

Please direct your comments to:

Marilyn Mirrasoul
City of San Diego
1222 First Avenue
San Diego, CA 92101-4135

with a copy to the State Clearinghouse in the Office of Planning and Research. Please refer to the SCH number noted above in all correspondence concerning this project.

If you have any questions about the environmental document review process, please call the State Clearinghouse at (916) 445-0613.

Sincerely,

Scott Morgan
Project Analyst, State Clearinghouse

Attachments
cc: Lead Agency

**DocumentDetailsReport
State Clearinghouse Data Base**

SCH# 2006091032
Project Title General Plan Update
Lead Agency San Diego, City of

Type **NOP** Notice of Preparation

Description The City of San Diego General Plan Update is proposed to replace the existing 1979 Progress Guide and General Plan. The General Plan sets out a long-range, comprehensive framework for how the city will grow and develop, provide public services, and maintain the qualities that define San Diego over the next 20-30 years. The proposed update has been guided by the City of Villages growth strategy and citywide policy direction contained within the General Plan Strategic Framework Element (adopted by the City Council on October 22, 2002) and would consolidate the existing thirteen elements in the 1979 General Plan into the following ten elements: Land Use and Community Planning; Mobility; Urban Design; Public Facilities, Services and Safety; Economic Prosperity; Recreation; Conservation; Historic Preservation; Noise and Housing (under separate cover).

Lead Agency Contact

Name Marilyn Mirrasoul
Agency City of San Diego
Phone (619) 446-5380 **Fax**
email
Address 1222 First Avenue
City San Diego **State** CA **Zip** 92101-4135

Project Location

County San Diego
City San Diego
Region
Cross Streets
Parcel No.
Township

Range

Section

Base

Proximity to:

Highways
Airports
Railways
Waterways
Schools
Land Use

Project Issues

Reviewing Agencies Resources Agency; Regional Water Quality Control Board, Region 9; Department of Parks and Recreation; Native American Heritage Commission; Department of Housing and Community Development; Office of Historic Preservation; Department of Fish and Game, Region 5; Department of Water Resources; California Coastal Commission; California Highway Patrol; Caltrans, District 11; Caltrans, Division of Aeronautics; Air Resources Board, Airport Projects

Date Received 09/08/2006 **Start of Review** 09/08/2006 **End of Review** 10/10/2006

MOP Distribution List

County: San Diego

SCH# 4000091032

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- Fish & Game Region 6**
Gabrina Gatchel
Habitat Conservation Program
- Fish & Game Region 6 *I/M*
Tammy Allen
Inyo/Mono, Habitat Conservation Program
- Dept. of Fish & Game M**
George Isaac
Marine Region

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Student Intern, 401 Water Quality Certification Unit
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State Water Resources Control Board
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Dept. of Toxic Substances Control
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- RWQCB 8**
Santa Ana Region (8)
- RWQCB 9**
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a Other _____

**DEPARTMENT OF FISH AND GAME**<http://www.dfg.ca.gov>

4949 Viewridge Avenue

San Diego, CA 92123

(858) 467-4201



October 10, 2006

Ms. Marilyn Mirrasoul
City of San Diego Development Services Center
1222 First Avenue, Mail Station 501
San Diego, California 92101

**Notice of Preparation of a Draft Program Environmental Impact Report
for the City of San Diego General Plan Update (SCH # 2006091032)**

Dear Ms. Mirrasoul:

The California Department of Fish and Game (Department) has reviewed the above-referenced Notice of Preparation (NOP) of a Draft Program Environmental Impact Report (DPEIR) for the City of San Diego General Plan Update. The City of San Diego has an approved Subarea Plan and Implementing Agreement under the Natural Community Conservation Planning program. The DPEIR for the proposed project must ensure and verify that all requirements and conditions of the Subarea Plan and Implementing Agreement are met. The DPEIR should also address biological issues that are not addressed in the Subarea Plan and Implementing Agreement, such as specific impacts to and mitigation requirements for wetlands or sensitive species and habitats that are not covered by the Subarea Plan and Implementing Agreement.

Issue areas in the DEIR that may be influenced by the Subarea Plan and Implementing Agreement include "Land Use," "Landform Alteration/Visual Quality," "Traffic/Circulation," "Biological Resources," "Drainage/Urban Runoff/Water Quality," "Noise," and "Cumulative Effects." In addition, the environmental document should describe why the proposed project, irrespective of other alternatives to the project, is consistent with and appropriate in the context of the Subarea Plan.

Thank you for the opportunity to comment. Questions regarding this letter and further coordination on these issues should be directed to Pam Beare at pbeare@dfg.ca.gov or (858) 467-4229.

Sincerely,

A handwritten signature in black ink, appearing to read "Elizabeth Lucas".

Michael J. Mulligan
Deputy Regional Manager

cc: State Clearinghouse

PB:pb
CityofSDGeneralPlanUpdateNOPshort.doc

PUBLIC UTILITIES COMMISSION

320 WEST 4TH STREET, SUITE 500
LOS ANGELES, CA 90013



October 2, 2006

Marilyn Mirrasoul
City of San Diego
1222 First Ave
San Diego, CA 92101-4135

Dear Ms. Mirrasoul:

Re: SCH# 2006091032; General Plan Update

As the state agency responsible for rail safety within California, we recommend that any development projects planned adjacent to or near the North County Transit District right-of-way be planned with the safety of the rail corridor in mind. New developments may increase traffic volumes not only on streets and at intersections, but also at at-grade highway-rail crossings. This includes considering pedestrian circulation patterns/destinations with respect to railroad right-of-way.

Safety factors to consider include, but are not limited to, the planning for grade separations for major thoroughfares, improvements to existing at-grade highway-rail crossings due to increase in traffic volumes and appropriate fencing to limit the access of trespassers onto the railroad right-of-way.

The above-mentioned safety improvements should be considered when approval is sought for the new development. Working with Commission staff early in the conceptual design phase will help improve the safety to motorists and pedestrians.

Please advise us on the status of the project. If you have any questions in this matter, please contact me at (213) 576-7078 or at rxm@cpuc.ca.gov.

Sincerely,

A handwritten signature in black ink, appearing to read "Rosa Muñoz".

Rosa Muñoz, PE
Utilities Engineer
Rail Crossings Engineering Section
Consumer Protection & Safety Division

C: Richard Walker, NCTD
John Shurson, BNSF Railway Company

DEPARTMENT OF TRANSPORTATION

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October 10, 2006

**11-SD-var.
PM var.**

Ms. Marilyn Mirrasoul
City of San Diego - Planning Dept.
1222 First Avenue, MS-501
San Diego, CA 92101-4135

RE: General Plan Update - NOP (Project # 104495, SCH 2006091032)

To Ms. Mirrasoul:

The California Department of Transportation (Caltrans) appreciates the opportunity to review the Notice of Preparation (NOP) of a Draft Environmental Impact Report (EIR) for the City of San Diego's General Plan update. We have the following comments.

Over the last few years, Caltrans has provided significant input into the General Plan's Strategic Framework Element. Caltrans supports the "City of Villages" concept which includes compact, mixed-use centers designed at a human (pedestrian) scale which enable residents and visitors to achieve a high level of mobility. Within a context of good urban design and "smart growth" principles, a "City of Villages" can help to increase mobility by providing functional alternatives to the automobile. For example, balancing housing and employment at a community scale enables residents to live and work in the same area, potentially decreasing demand on inter-regional transportation facilities. Another feature of "smart" development is the placement of buildings oriented to a street or transit stop instead of to a parking lot, in order to further encourage walkability. Linking Villages with a network of interconnected trails, bicycle paths, and/or transit routes allows residents to walk or ride to a variety of destinations instead of requiring use of an automobile for every trip.

While recognizing that topographic constraints may preclude a strict grid street network, **arterials** which are routed parallel to freeways and highways can provide an alternative to using the interregional facility, thereby helping to alleviate congestion on State facilities. A street system with minimal **interconnectedness** - where drivers are siphoned from local streets to collector streets to major streets and arterials - concentrates traffic leaving few choices to drivers. An interconnected grid street system offers the traveler multiple paths to reach any destination thereby alleviating potential congestion by providing alternative routes.

In the same manner, an interconnected, continuous trail network can help to increase mobility while having a positive effect on residents' "quality of life" by providing convenient and safe

Ms. Marilyn Mirrasoul
October 10, 2006
Page 2

recreational opportunities as well as commuting routes. Paths, **greenways**, and other passive recreational uses such as linear parks are an appropriate fit along local rivers, creeks, and canyons, provided they are constructed in an environmentally conscientious manner. Continuity and connectivity across **jurisdictional** boundaries are important considerations that may necessitate additional coordination with adjoining jurisdictions (i.e.: San Diego County and adjoining Cities).

In accordance with the Strategic Framework, Caltrans encourages the City of San Diego to implement redevelopment activities which serve to target growth into existing areas (Villages) which can be more readily served by infrastructure improvements. However, there are impacts associated with growth which must be mitigated. While Caltrans is supportive of providing transportation choices via alternative modes, vehicular traffic will continue to be the predominant mode in the City for the immediately foreseeable future. Land use intensity changes have the potential to impact freeway segments as well as freeway on- and off-ramps / interchanges. Caltrans recommends the City work cooperatively with Caltrans and other local and regional agencies (e.g., SANDAG) in addressing and mitigating these impacts.

Caltrans endeavors that any direct impacts to the State Highway System be eliminated or reduced to a level of insignificance pursuant to CEQA standards. Mitigation measures must be included in a traffic impact analysis and environmental studies for the Draft EIR. Cumulative impacts must also be considered. A cumulative impact is the sum of the impacts of existing conditions, other projects, and the project itself. There is no minimum size limitation on projects which may be required to mitigate for cumulative impacts if contributing to a traffic problem in any amount. Caltrans supports the concept of "fair share" contributions to mitigate for direct or cumulative traffic impacts created by proposed development, including infill or redevelopment. Potential improvements may include - but not be limited to - transit improvements, future interchange projects, widening ramps, ramp metering, ramp signals, **and/or** freeway lane additions (e.g., auxiliary lanes).

Caltrans looks forward to continued cooperation with the City of San Diego on coordinating transportation and land use. For questions regarding the Department's comments, please contact Brent C. McDonald at (619) 688-6819.

Sincerely,


A= AL COX, Acting Chief
Development Review Branch



County of San Diego

GARY L. PRYOR

DIRECTOR

DEPARTMENT OF PLANNING AND LAND USE

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November 3, 2006

Ms. Marilyn Mirrasoul
City of San Diego Development Services Center
1222 First Avenue, MS 501
San Diego, CA 92101

Dear Ms. Mirrasoul,

The County of San Diego (County) has received and reviewed the Notice of Preparation for the Program Environmental Impact Report (PEIR) dated September 7, 2006 for the City of San Diego General Plan Update (GPU) and appreciates this opportunity to comment. In response to the NOP, the County has identified environmental issues that may have a significant effect on the unincorporated lands of San Diego County. The PEIR should present thorough analysis and explore reasonable alternatives and mitigation measures.

The County is the land use authority for the unincorporated area of San Diego and our public constituency looks to us to guide reasonable and environmentally sensitive development in our jurisdiction. Staff from the Department of Planning and Land Use (DPLU) and the Department of Public Works have reviewed the NOP and have identified certain issues that should be analyzed in the PEIR.

COMMENTS:

1. Please clearly identify whether the GPU Program EIR will be used to approve subsequent development without further CEQA review. The County requests that PEIR identify "covered" projects near the County's jurisdictional boundary and, in that case, that the PEIR include appropriate project-level analysis.
2. The GPU has the potential to influence growth in the unincorporated communities of Rancho Santa Fe, Fairbanks Ranch, 4S Ranch, Bonita, La Presa, and East Otay Mesa. The County requests that a thorough analysis of growth induction be done and that resulting land use impacts that affect the unincorporated portion of the County be clearly identified. These impacts would require evaluation of compatibility and consistency with the County's General Plan and draft General Plan 2020.
3. The land use impacts resulting from GPU-proposed annexations of the Davis Ranch and Mount Hope Cemetery should be analyzed in detail to determine their impacts on

the unincorporated County land. In addition any other annexations of unincorporated land by the City of San Diego should also be subject to the same level of detailed analysis. If proposed annexations result in significant unmitigable impacts to emergency services (fire, sheriff, and ambulance), local community character (urban sprawl), traffic, or the County's ability to govern, they should not be pursued.

4. It is a County priority to maintain the recreational values of the Los Penasquitos Canyon Preserve, San Dieguito River Park, Otay Valley Regional Park, Tijuana River Valley Regional Park, Sycamore Canyon/Goodan Ranch Preserve and Sweetwater Regional Park. The PEIR should analyze all potential impacts and identify appropriate mitigation, especially where the GPU results in growth proximal to these parks.
5. Please note that planned development adjacent to preserved lands in the existing South County of San Diego Multiple Species Conservation Program (MSCP) Subarea and adjacent to proposed Pre-approved Mitigation Areas (PAMA) in the draft North County MSCP Plan area should follow the guidelines outlined in Section 1.10 (Land Uses Adjacent to the Preserve) of the adopted South County MSCP Subarea Plan (October 22, 1997).
6. The PEIR should analyze if there are conflicts with the County Trails Master Plan and Program. Regional trail as well as community trails should be connected with the City's trail system for maximum public benefit.
7. The County requests that the PEIR include a thorough analysis of the GPU's regional effects including air and water quality impacts, including a determination whether impacts will result in cumulatively considerable or significant impacts in our jurisdiction.
8. The PEIR should evaluate compliance with the San Diego National Pollution Discharge Elimination System (NPDES) Permit Number (CAS0108758) and the potential impacts on the Watershed Urban Runoff Management Programs jointly administered by the City the County and other regional co-permittees.
9. The NOP only provides a general project description. Coordination with County staff is recommended as each portion of the General Plan update is developed. Continuity and consistency between the City's and County's General Plans are recommended.
10. On August 2, 2006 the Board of Supervisors endorsed the General Plan 2020 road network recommendations. The PEIR should discuss the GP 2020 recommendations and assess what potential impacts the City's proposed Circulation Element Plan may have on the County's proposed General Plan.
11. City and County staff have initiated coordination efforts for the City's Otay Mesa Community Plan Update and the County's East Otay Mesa (EOM) Specific Plan Update. City and County staff should continue to coordinate in developing a consistent traffic model database that can be used in the long-range traffic assessments for both the City and County plan updates. County staff has provided the City with land use and roadway network database information from the County's General Plan 2020 Update for their

Otay Mesa Plan Update. County staff could provide similar GP 2020 data/information for the City's General Plan Update analysis.

12. The PEIR should provide a comparative and plan-to-ground assessment of the direct and cumulative impacts of the existing plan and the proposed land use scenarios to the county's Circulation Element roadway network and the City's network. The assessment of significant traffic impacts should also be provided for the buildout scenario. Feasible mitigation measures should be provided for all significant impacts.
13. The PEIR should identify the differences in projected LOS on County's Circulation Element roadways facilities for the proposed land use scenarios. The LOS assessment for County roadways should be based on the County's Public Road Standards criteria.
14. The PEIR should clearly identify the roadway network assumptions for the planned Caltrans freeways for the buildout scenario. The PEIR should identify any deviation from the SANDAG 2030 Regional Transportation Plan (RTP) for Caltrans freeways and regional arterials that traverse both the City and County's jurisdiction.
15. The PEIR should clearly identify proposed changes to the City's Circulation Element Plan (deletions, reclassifications, and alignment). The PEIR should clearly identify proposed circulation changes that will impact the County's Circulation Element network. Several existing and planned roads traverse both the City and County's jurisdiction.
16. The City should coordinate with the County to ensure consistency in the classification/design of Circulation Element roads, bicycle network corridors, and transit routes that traverse both jurisdictions.
17. The County has adopted Transportation Guidelines for the Determination of Significance (www.sdcdplu.org/dplu/Resource/docs/3~pdf/Traffic_Guidelines.pdf) dated September 26, 2006. We recommend that they be a guide in the preparation of the traffic analysis.
18. CMP/SANTEC guidelines state that the project study area should extend to include road segments and intersections that receive 50 or more peak hour from the proposed project. County guidelines recommended extending the scope of analysis to 25 peak hour trips for roadways currently operating at LOS E/F.

The County of San Diego appreciates the opportunity to continue to participate in the environmental review process for this project. We look forward to receiving and future environmental documents related to this project the DEIR for review or providing additional assistance at your request. If you have any questions regarding these comments, please contact Maggie Loy at (858) 694-3736.

Sincerely,



GARY L. PRYOR, Director
Department of Planning and Land Use

GLP:JEG:ml

cc: Eric Gibson, Deputy Director, Department of Planning and Land Use
Ivan Holler, Deputy Director, Department of Planning and Land Use
Vince Nicoletti, Staff Officer, Deputy Chief Administrative Office
Maggie Loy, Planner III, Department of Planning and Land Use
Joe DeStefano, Planning Manager, Department of Planning and Land Use
Priscilla Jaszkwiaak, Administrative Secretary, Department of Planning and
Land Use
Trish Boaz, Chief, County Department of Parks and Recreation
Ralph Steinhoff, County Fire Marshal, Department of Planning and Land Use
Lee Shick, Project Manager, Department of Public Works
Rob Reider, Supervising Air Resources Specialist, Air Pollution Control District



PLANNING & BUILDING DEPARTMENT

October 10, 2006

Marilyn Mirrasoul
City of San Diego Development Services Center
1222 First Avenue, Mail Station 501
San Diego, CA 92101

**SUBJECT: Notice of Preparation (NOP) for the City of San Diego General Plan Update
Draft Program Environmental Impact Report: Project Number: 104495**

To Whom it May Concern:

Thank you for the opportunity to comment on the Notice of Preparation (NOP) for the City of San Diego General Plan Update Draft Program Environmental Impact Report (EIR). We offer the following comments:

- Each alternative analyzed in the Program EIR should use our recently adopted City of Chula Vista General Plan Update (December 13, 2005) for its background land use assumptions within Chula Vista's Planning Area. A copy of this document can be found on our web site at www.chulavistaca.gov. We would be happy to coordinate with you to ensure appropriate TAZ-level land use values are used.
- The traffic analysis should include circulation network alternatives that include La Media Road crossing Otay River Valley, as well as an alternative in which it does not cross the Otay River Valley
- The GPU PEIR proposed project and alternatives should analyze Heritage Road/ Otay Valley Road in its "existing" configuration, as well in the "buildout" condition as shown in the City of Chula Vista's current General Plan.
- The traffic analysis should closely examine potential impacts to nearby major arterials and intersections within the City of Chula Vista's jurisdiction, including Main Street and its intersection with Interstate 805.
- The potential reduction in employment lands on Otay Mesa should be analyzed against the amount of new residential on Otay Mesa, as well as residential planned within the Otay Ranch in Chula Vista, which had assumed employment attraction on the Mesa (Jobs/Housing analysis).

Please contact me at (619) 691-5005 if you have any questions regarding this matter.

Sincerely,

A handwritten signature in black ink, appearing to read "Ed Batchelder", with a horizontal line extending to the right from the end of the signature.

Ed Batchelder
Advance Planning Manager

cc: Jim Sandoval, Director of Planning and Building
Marisa Lundstedt, Environmental Projects Manager
Frank Herrera-A, Associate Planner

Environmental Health Coalition

COALICION de SALUD AMBIENTAL

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ehc@environmentalhealth.org * www.environmentalhealth.org

October 2, 2006

Marilyn Mirrasoul
City of San Diego Development Services Center
1222 First Ave., MS 501
San Diego, CA 92101

RE: Project Number 104495

Dear Ms. Mirrasoul,

Thank you for the opportunity to provide comments on the scope of the Program Environmental Impact Report (PEIR) for the General Plan Update (GPU). Environmental Health Coalition (EHC) is a 26-year-old community-based organization working to achieve environmental and social justice. We work with over 3000 members primarily in the Logan neighborhoods of San Diego, Old Town National City, western Chula Vista and Colonia Cilpancingo, Tijuana.

EHC has worked with the city and other stakeholders throughout the GPU process to create land use policies that will promote environmental justice and protect public health. For example, we have worked to craft the collocation policy contained in the Economic Prosperity Element to protect sensitive receptors from exposure to toxic pollution and chemicals. As such, we believe it is critically important that the PEIR for the GPU provide the public with a clear analysis of environmental impacts—both positive and negative—that will result from the passage of this plan. Specific suggestions are detailed below.

1. Accurately represent impacts in the communities that make up the city of San Diego.

The PEIR's description of environmental issues should include descriptions of existing air and water quality impacts and identify which communities bear an unequal burden of toxic pollution. It should also describe where patterns of the incompatible mixing of toxic and/or industrial uses with sensitive receptor uses have resulted in public health hazards. This analysis should thread through the entire PEIR so that the analysis of the proposed plan's impacts accurately portrays potential detriments and benefits to each of San Diego's communities.

2. Use the California Air Resources Board (CARB) *Air Quality and Land Use Handbook* as a yardstick.

The CARB Handbook, published last year, sets forth clear land use and planning guidelines for protecting public health. The GPU and each alternative should be evaluated against these guidelines for land use decisions near freeways, industries and other uses. Through the PEIR, the public should be able to understand which alternatives, and which specific policies, do the best job of complying with CARB's guidance for protecting public health.

The importance of CARB's guidelines in planning point to the need for a more comprehensive air quality analysis in the PEIR. The scope of the PEIR's analysis must be broadened to include more than just traffic impacts. The CARB estimates that 70% of air pollution-related cancer risk in the state is caused by particulate matter, much of which comes from diesel emissions. Analysis of impacts from goods movement in general and diesel vehicles and equipment in particular must be analyzed separately from other vehicular sources. Additionally, industrial air pollution sources must be analyzed fully, as must highly hazardous low-level emissions within communities such as

hexavalent chromium from plating shops. In fact, it is reasonable to expect that land use restrictions may need to be more stringent in the most at-risk communities to ensure environmental health of those communities.

3. Conduct a full assessment of cumulative impacts.

The PEIR should use the California EPA's adopted definition of cumulative impacts so that the public may have an understandable picture of how the GPU could enhance and/or degrade the environment and their health.¹ Specifically, the analysis should identify existing and expected impacts from neighboring jurisdictions and describe how those compound GPU impacts at the community, city and regional level. For example, this section of the PEIR should identify air quality impacts from the Unified Port of San Diego and discuss how those, combined with GPU air quality impacts, will affect the air in neighboring communities like Barrio Logan, citywide and in the regional air basin.

4. Expand the analysis of the No Prime Industrial Lands alternative.

The proposed "No Prime Industrial Lands" alternative should include an analysis of the collocation policy which is a companion to the Prime Industrial Lands map in the Economic Prosperity Element. This analysis should describe a scenario without a collocation policy or Prime Industrial Lands. Furthermore, this alternative should use the Otay Mesa Community Planning Area as a test case. Because the Otay Mesa Community Plan Update is currently underway, the community has essentially been exempted from the GPU process and policy development. Since it is the only community with remaining vacant industrial lands, it must be analyzed as the primary example to demonstrate the impacts of the proposed GPU. It is equally important to use Otay Mesa to demonstrate the impacts of *not* including the collocation and Prime Industrial Lands policies.

5. Ensure broad public participation

The city should make every effort to ensure that the public has access to and understands the PEER. The GPU is a citywide plan, but, as always, many policies will affect some communities more than others. Especially in the realm of environmental quality, special effort should be made to reach out to those communities identified in the PEIR as disproportionately impacted.

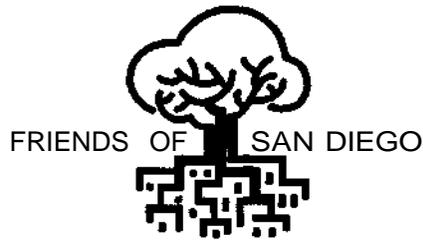
Thank you for considering EHC's comments. Please feel free to contact me with questions or concerns at (619) 474-0220 x107.

Sincerely,



Laura M. Benson
Policy Advocate

¹ As stated on California EPA's website, <http://www.calepa.ca.gov/EnvJustice/ActionPlan/> : "Cumulative impacts means exposures, public health or environmental effects from the combined emissions and discharges, in a geographic area, including environmental pollution from all sources, whether single or multi-media, routinely, accidentally, or otherwise released. Impacts will take into account sensitive populations and socio-economic factors, where applicable and to the extent data are available."



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October 6, 2007

City of San Diego
Development Services Center
Attn: Marilyn Mirrasoul
1222 First Avenue, MS 501
San Diego CA 92101

**Re: Comments on Scope of Work for Program EIR,
General Plan Update (Project 104495)**

Reference documents: Notice of Preparation dated 9/7/06 and
accompanying letter from Robert J. Manis regarding scope

Introduction

The following comments and questions are submitted for the purpose of encouraging a full and complete analysis of the impacts associated with the General Plan Update. Since this plan is intended to guide growth and development in the City of San Diego for up to 20 years, it must be analyzed thoroughly, with mitigation and project changes as required to prevent degradation in residents' quality of life.

The City Planning and Development Services staff ("staff") need to more carefully define the objectives of the new General Plan, with the draft now totaling about 500 pages. Is the goal to accommodate growth, increase growth or relocate growth from one area to another? The project and PEIR should eliminate nebulous goals like "increasing housing choices", since most communities have a variety of housing types already.

Will the General Plan assure public facilities and infrastructure at the time of need, or add to the deficiencies? Can small-scale villages be created to provide new gathering places while avoiding the harmful impacts of oversized projects? An intensive analysis based on a carefully-defined PEIR would increase the chance that the new General Plan improves residents' quality of life, and doesn't make it worse.

1. Remember the businesses. The proposed project and PEIR outline still place an inordinate emphasis on residential development. Housing units are easy to count, and the City gets lots of pressure from State officials regarding housing sites. In addition, City officials are prone to believe in a "housing shortage" and promises about "building our way to affordability". Nevertheless, the General Plan must consider the commercial and industrial development that will be needed to serve new residents.

If 6,000 more housing units are to be added to North Park, for example, the City must make sure that its policies don't drive out the auto repair shops, printers, and other businesses from the commercial and industrial areas. With other communities targeted for large increases in homes but little industrial development, especially Mission Valley and Centre City, the General Plan must acknowledge the pressure upon nearby communities to become service districts.

2. Review of 2002 PEIR. The staff is encouraged to review the Project EIR associated with the Strategic Framework Element in 2002. That year, the City received a comment letter from David Potter demonstrating that the PEIR did not address many of the items specified in the scope. For the General Plan and its new PEIR, the staff is requested to pay more attention to covering all the issues required by CEQA and City policies, and all the issues specified in the scope.

3. Consistency with Community Plans. In the 2002 PEIR, the authors skirted the issue of consistency between the General Plan and Community Plans by stating that community plans would have to be changed. This ignores the interim period between adoption of the General Plan and adoption of revised community plans, which could take up to 10 years to complete.

a. If some existing community plans are already consistent with the General Plan at the time of GP adoption, then there will be no reason to amend those community plans, except for reasons unrelated to the General Plan.

b. If other existing community plans are not consistent with the General Plan, then how will the City deal with the interim period, during which the General Plan and those community plans will be inconsistent?

4. Alternatives.

a. Obsolete targets. Why do proposed alternatives B and C use the same targets for additional housing units that were used in 2001-2002? SANDAG has created two new forecasts since then, and several community plans have been amended. So the figures of 17,000 to 37,000 dwelling units

have no current significance. The City might as well use the number 1,700 or 170,000, or use a random number generator to choose a target!

b. More housing sites than forecast demand. The draft Housing Element contains a site inventory totaling 122,233 units.¹ The SANDAG draft Series 11 Forecast projects demand of 78,884 units between 2005 and 2020. So the City already contains capacity for about 43,000 more homes than the projected need for 15 years. This should lead to a reevaluation of two underlying assumptions that seem prevalent among the staff:

- i. that the City needs more housing sites; and
- ii. that the City needs to encourage the building of more units than the market would otherwise require.

c. Sites or built units? Regarding the proposed figure of 37,000 additional units, and comparing this with the SANDAG forecast quoted above, I request a clarification: Is staff proposing an increase of up to 37,000 more housing sites than exist under current community plans and zoning, or an increase in up to 37,000 more units built than the forecast demand, or both?

d. More sites. If the proposal is for more housing sites, while assuming the same forecast demand, then the PEIR should analyze how this would lead to a change in the location of units built. Consider, for example, that Ocean Beach and Scripps Ranch follow the encouragement (or mandate) of the new General Plan. They amend their community plans to add Village and Transportation Corridor projects consisting of 1,000 housing sites each. As housing units get built on these sites, this would necessarily result in fewer units being built elsewhere, such as La Jolla, Mission Valley and Centre City. Is the staff prepared to analyze the impacts of such a locational shift in growth patterns?

e. More units. If the proposal is for more units built than the forecast demand, this raises new questions for the PEIR to analyze. Consider an alternative in which the City of San Diego government, by following its new General Plan, successfully encourages the building of 37,000 more units than would otherwise be built by 2020. This course of action would result in 115,884 new units being built, compared to the current forecast of 78,884. If so, this would necessitate the following issues to be analyzed in the PEIR:

- i. Is this alternative feasible?

¹ Some of the 122,000 sites have already had housing units constructed, which would lower the number of remaining sites. However, some housing sites were not included in the inventory because their zoning has not been finalized. These include the proposed addition of 5,000 to 8,000 units in Mission Valley.

ii. What actions would the City have to take to increase housing demand by 47%? Perhaps the City could waive property taxes and impact fees for new businesses; offer generous rent subsidies to anyone moving here; or fill-in some city-owned canyons and offer free land for businesses that relocate to our City.² The proposed actions would need an analysis of their environmental impacts, of course.

iii. The PEIR must acknowledge that the City has control over zoning, but not over when and where a developer will decide to build, or where a resident will decide to live. If the City were able, through new General Plan policies, to get tens of thousands more homes built than without the policies, and the resulting City population was increased above the forecast, then the PEIR must consider the likely shift in growth patterns from other cities to San Diego. City planners may wish that adding more urban homes will reduce long distance commuting, but there is no evidence that this would occur. If 1,000 housing units are added to Rancho Bernardo, there is no reason to think this would attract someone from Fallbrook, rather than a resident from Poway or La Mesa. Economist Richard Carson testified at SANDAG that people move to Fallbrook and Temecula to obtain a detached home at a lower price. So they are unlikely to change their decision because the City of San Diego adds attached housing in Mira Mesa or Mission Valley.

5. Objectives regarding growth.

The consideration of alternatives, as required by CEQA, necessarily causes a close examination of the project's objectives. The various alternatives must be measured by how well they meet the objectives, in addition to how they impact the environment. So I ask the staff, in relation to this PEIR:

a. Three growth objectives. Is the objective to increase growth, relocate growth from one area to another, or accommodate growth? All three objectives have been put forth in various city documents.

b. Increasing growth. Will the PEIR acknowledge the growth-inducing link between City of San Diego zoning and SANDAG growth forecasts? The staff is aware that SANDAG starts with regional growth forecasts, then allocates housing units to the county and cities based upon their general plan and zoning capacity. So increases in housing sites via

² This is serious! Trying to follow the consequences of the proposed alternatives is hard work! If the reader is skeptical of my ideas for incentives, then I encourage that reader to devise his own methods for filling 37,000 housing units in addition to the ones forecast to be needed. 37,000 more units would mean about 100,000 more residents. If that's too tough a goal for 2020, the target date could be moved to 2030. Remember that the City of San Diego can zone for more units, but would have to compete with the County of San Diego, Chula Vista, Poway, San Marcos, and other cities. About 10 cities have substantial land targeted for development.

upzoning will lead to higher forecasts in the future for the City. The higher forecasts lead to increased pressure from the State Housing and Community Development Dept (HCD) to add even more housing sites. A twenty year supply is needed, according to some officials. This system of "Forecast, upzone, build; forecast, upzone, build" is relevant to the Growth Inducement section, since increases in housing sites from new General Plan policies will predictably lead to new waves of growth pressures. In contrast, the cities within our region that have acknowledged they have reached buildout, or are close to buildout, are getting smaller allocations of forecast demand from SANDAG.

c. Relocating growth. The General Plan infill strategy follows the 20-year-old "Smart Growth" concept. This concept is based on channeling growth from less suitable areas to more suitable areas. Unfortunately, the City has waited to embrace Smart Growth until it has nearly completed the expansion into all its far-flung suburbs. With approvals already granted to develop most of the remaining vacant lands, the City has little ability to prevent growth in outlying areas of the City. The City does have the ability to shift growth from one community to another, but has not chosen to examine this option. For example, it's quite possible that current capacity of 7,000 housing units in North Park and 5,500 units in Uptown should be revised downward, in view of the recent tripling of housing capacity in Centre City. If the City is committed to channeling a large portion of growth to downtown, then staff should support attempts to reduce the competition from nearby communities, especially when those communities have substandard infrastructure.

d. Accommodating growth. The citizens committee made it clear during the period of 2000 to 2002 that the new General Plan should accommodate growth but not encourage or create it. The PEIR must clarify if this is still the policy, and explain how this is consistent with affirmative steps to induce growth of new Villages and other infill.

6. Transportation.

a. One of the stated goals is that the City of Villages strategy will "help support a state-of-the-art transit system". The PEIR should not venture into unsupportable illusions that overstate this link. If a community has 40,000 residents now, will adding another 2,000 to 4,000 residents turn an infeasible transit system into a feasible one?

b. The additional vehicle trips associated with new development projects must be faced squarely. If 500 housing units and 500,000 sq. ft. of commercial space are added to a particular block, we can anticipate 5,000 to 10,000 daily trips. Even if 20% of the new residents use mass transit, which would be an ambitious goal, the other 80% are adding to car traffic. Also, the mass transit vehicles themselves add to street traffic.

7. Public facilities and infrastructure- more than a wish-list.

a. The City has acknowledged that public facilities have not kept pace with development, especially in the older communities. Yet the draft Public Facilities Element still fails to provide mechanisms that firmly tie new development to the needed facilities. Seven years after the General Plan process was started, the project contains little more than a "wish-list" of needed public facilities, along with a list of potential tax increases.

b. Here's a proposal based on other cities which have Adequate Public Facilities Ordinances:

The General Plan scope should include a requirement that each community create a phasing plan (or concurrency plan) that ensures adequate public facilities before or concurrent with new development. Development cannot proceed if the public facility goals are not met.

c. The draft General Plan still contains only a weak commitment about new development paying a fair share. Something stronger is needed, for example:

"New development must pay the cost of providing all public facilities and infrastructure attributable to the new development." The logic is obvious: Existing residents will have to pay to cure existing deficiencies, and certainly can't be expected to subsidize new development also.

d. Regional facilities. SANDAG has stated in several reports that new development in our region is not covering the full costs of regional facilities. The main components are transportation and justice facilities (courthouses and jails). Chula Vista is an example of a city which authorized large-scale development without the needed facilities. They are now scrambling to catch up with the justice facilities to serve their self-induced population increase. The scope of the PEIR should include the issue of regional facilities.

e. Facility financing. Theoretically, quality of life can be maintained while a city grows rapidly, if unlimited money were available for public facilities. In reality, our city, like others in California, never gets enough money from the new development to cover the capital cost of all needed public facilities. A PEIR doesn't necessarily include detailed financial information regarding mitigation, but the cost issue can't be ignored. Proposing mitigation that can't feasibly be paid for will not meet CEQA requirements. Furthermore, it would be grossly unfair to residents to present sham mitigation that has no reasonable chance of being provided.

f. Operating costs. A city that is reeling from financial problems must avoid costly new entanglements. Our City officials and staff must question the myth about "increasing the tax base". Even if new development covers

the capital costs of new facilities, it seldom provides enough ongoing revenue to cover operations and maintenance costs.

The City's own reports acknowledge that residential development doesn't pay for itself, since the costs of park maintenance, police and fire coverage, road maintenance and other services are more than the added revenues. When the City counts all the ongoing costs, which include public employee salaries and benefits, equipment and materials, it is questionable whether commercial and industrial development pay their ongoing costs either. If growth and development brought in extra money, after decades of growth the City of San Diego would be rich! The PEIR must take a realistic approach to mitigation, and include, for example, how new parks will be acquired, and also how they will be maintained.

8. Meaningful alternatives.

The City should consider more meaningful alternatives, rather than the warmed-over ones from four years ago. Here are some new alternatives proposed for the PEIR:

a. Focus growth downtown. In view of the recent additions to housing capacity and commercial capacity in Centre City, the General Plan must acknowledge reduced needs for other communities to absorb new development. A viable alternative for the period 2006 to 2030 might be to focus 80% of the infill in Centre City.

b. Small villages. Without growth targets or quotas, communities can plan small-scale villages. These would be just big enough to provide "lively activity centers" and improve walkability, while avoiding grandiose mega-projects that will add to public facility deficiencies and degrade quality of life.

c. Large-scale growth. If the PEIR is to include a full range of alternatives, then it probably should include a "high growth" scenario. The most convenient model for this is the map which the Planning Department provided to SANDAG for use in the regional Smart Growth Concept Map. The map provided by the Planning Department includes speculative development that isn't included in the adopted community plans, and which is located in areas which the Planning Staff thinks that new development should go. This map is unburdened, at this point, by the need to demonstrate sufficient demand for the added housing, or the City's ability to provide adequate public facilities. That makes the unauthorized map the perfect candidate for the high-growth alternative, and the perfect comparison for better alternatives. If the map is good enough for the Planning Dept. to give

to SANDAG for use in regional transportation planning, then it should be good enough to use for a Program EIR alternative project.³

Thomas G. Mullaney, president

NOP_Scope_FOSD.doc

³ We must remember: Every unit of housing added will predictably increase the city's permanent population by about 2.7 people. Growth inducement carries a heavy responsibility.



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Writer's Direct Line: 619-338-6524
djones@sheppardmullin.com

October 6, 2006

Our File Number: 05FF-110431

VIA E-MAIL AND U.S. MAIL

Marilyn Mirrasoul
City of San Diego Development Services
1222 First Avenue, MS 501
San Diego, CA 92101

Re: Draft Program Environmental Impact Report - City of San Diego General
Plan Update - Project No. 104495

Dear Ms. Mirrasoul:

Thank you for the opportunity to review and comment on the Draft Program Environmental Impact Report - City of San Diego General Plan Update, Project No. 104495 ("PEIR"). This letter is written on behalf of the Otay Mesa Planning Coalition ("Coalition"), a consortium of seven landowners in the Otay Mesa area of the City of San Diego. Our comments are based on the last-available version of the General Plan Update, since the revised draft that was to be released this September has not yet been circulated for review.

On behalf of the Coalition, we have the following comments and requests for clarification on the PEIR.

PROJECT DESCRIPTION

The project description should be consistent and complete; as a result, please include the Housing Element in the PEIR's project description, even though the Housing Element is being processed separately. Inclusion of the Housing Element in the PEIR's project description and environmental impact analysis is essential to assuring internal consistency in the General Plan and adequacy of the PEIR itself.

In addition, if the various General Plan Elements are going to continue to include regulations (rather than policies and goals), then the impacts from imposition of such regulations also must be analyzed. (We suggest that for consistency and flexibility, among other reasons, the regulations should be removed from the body of the General Plan Update Elements and instead processed as part of an update to the Land Development Code or other portions of the City's municipal code, so that the General Plan Elements can be focused on policies and goals.)

Marilyn Mirrasoul
October 6, 2006
Page 2

As part of the description of the Economic Prosperity Element, the PEIR should address the fact that the Economic Prosperity Element does not accurately portray the existing Otay Mesa community. Instead, it assumes land uses that were planned in 1981 but never developed, creating the potential for inaccuracies in the baseline used for analysis. For example, the Economic Prosperity Element suggests that more industrial land is needed in Otay Mesa when in fact the market demand studies indicate that much less industrial land is required, and the shortfall is in residential land. In addition, the outdated description of the Otay Mesa community found in the current draft of the Economic Prosperity Element suggests a type of industrial land use exists that may have more negative environmental impacts than the industrial uses that are forecasted to comprise most of the economic growth through 2030. The uses assumed in Otay Mesa would result in air quality and traffic impacts that are unlikely to result when the existing or reasonably foreseeable uses are assumed. The inaccuracy of the assumptions used for the industrial land uses makes it difficult to assure an accurate analysis of the resulting impacts in all of the environmental issues areas.

LAND USE

The PEIR should discuss the impacts resulting from reserving land for industrial uses even when the manufacturing uses for which the land is being reserved are stagnant and, in fact, diminishing as a proportion of the local economy. Studies demonstrate that a substantial portion of the region's future growth will be in services and technology-related uses that have higher density workplaces on less land and in closer proximity to other land uses. The result of preserving land for manufacturing uses that never develop, while failing to set aside land for the residential and professional/services uses that do, will create land use conflicts that should be addressed in the PEIR. The basis for the Economic Prosperity Element's conclusions regarding economics associated with manufacturing also should be disclosed, because setting aside land for manufacturing uses due to a perceived but unsupported need for such land uses will have significant environmental consequences.

The PEIR also should address the impacts resulting from the shortage of residential land that that will continue to exist should the General Plan Update Elements as currently drafted ultimately be adopted. The PEIR must acknowledge the existing and anticipated housing crisis documented by, among others, SANDAG. The PEIR must address the land use conflict that arises from a Regional Growth Forecast that recognizes there will be a substantial housing shortage by 2030, but a General Plan Update that makes it more difficult to rezone land for residential uses and which instead preserves employment land which the Regional Growth Forecast concludes will be in oversupply in the future.

In addition, the 1000-footbuffer proposed as part of the Economic Prosperity Element creates potentially significant land use conflicts with the Strategic Framework Plan, the City of Villages, and other existing plans and policies calling for more residential density near employment uses. The buffer is derived from one particularly toxic air contaminant identified in

the California Air Resources Board ("CARB") guidelines, hexavalent chromium from chrome platers (CARB *Air Quality and Land Use Handbook: A Community Health Perspective*, page 4, published in April 2005). Chrome plating is not widespread in base sector industries, which hardly serves as justification for establishing a 1000-foot buffer from all industrial uses. The PEIR should analyze how imposition of a 1000-foot buffer not only increases the City's already existing housing crisis but also makes consistency with the above-mentioned "smart growth" policies more difficult to implement.

There are many measures by which impacts from locating residential near manufacturing or other industrial uses can be avoided or mitigated other than by imposition of a buffer, and those measures also should be addressed in the PEIR. The housing supply impacts of the buffer and other constraints on residential uses caused by the policies of the draft Economic Prosperity Element should be disclosed and analyzed.

Whether in the Land Use section or another section, the PEIR should discuss the impacts from adding a third port of entry into the United States from Mexico, and means by which processing and moving goods across the border can be made more efficient.

AIR QUALITY

The PEIR should discuss the toxic materials, emissions and emergency management services and plans that will be required if the current draft of the Economic Prosperity Element is adopted, including an identification of industrial clusters and the assumed emissions from such clusters. Relying on overly broad industrial categories is not sufficient for purposes of the CEQA analysis, which requires sufficient details to establish an accurate baseline for a thorough environmental analysis.

The impacts from imposition of a 1000-foot buffer between industrial and residential uses should be evaluated in the air quality section as well as the land use section of the PEIR. The buffer assumes that air emissions are generated by all industrial uses as a starting point. The PEIR should address how local conditions, including prevailing winds, topography and similar characteristics, effect air emissions and therefore should effect the need for any buffer imposed as part of a General Plan Update Element.

The PEIR should discuss the evolving science and regulations that reduce the impact of pollutants on human health. For example, substantial reductions in diesel particulate emissions will occur through implementation of cleaner fuels and engines, which are being phased in now by state agencies. The reduction in background emissions due to those and other means of reducing emissions should be taken into consideration in this PEIR.

PUBLIC SERVICES AND FACILITIES

In its discussion of the need for park land and land for schools and similar public facilities, the PEIR should recognize and discuss a range of equivalencies, including private recreational facilities being used to meet park requirements; smaller, frequently distributed pocket parks; and the contributions to park and recreational opportunities presented by regional open space and beaches. To assure accuracy in determining the need for park and recreational facilities, the PEIR should distinguish between single and multi-family households, since they have different population characteristics. Moreover, the PEIR should discuss the impacts that will result if the City is unable to require payment of fees or dedication of park lands due to failure to adopt enabling legislation under the Quimby Act. The PEIR also should address the impacts from housing shortages that would result from failure to allow joint use between park and recreational facilities and school facilities. If such joint use is prohibited, additional housing opportunities will be lost, and housing will be displaced to make room for parks, making the already existing housing shortage worse.

Similarly, the PEIR should take into account Assembly Bill 2751 and how this will impact construction and financing of public infrastructure, and whether an inability to obtain funding will create deficiencies.

BIOLOGICAL IMPACTS

The Biological Impacts section of the PEIR should address the impacts associated with lack of funding required to maintain open space, including open space preserved in the MHPA.

ALTERNATIVES

The PEIR should address an alternative to setting aside of substantial blocks of land for manufacturing and similar industrial uses, and include an alternative that recognizes that economic studies indicate that in fact less land will be required for such uses in the future. It should describe an alternative that, instead of preserving land for manufacturing, designates the majority of that land for services that studies indicate will make up the bulk of economic growth in the City of San Diego over the next 20 years. This alternative can be based on SANDAG's conclusion that a surplus of planned employment land exists in the region, along with a corresponding shortage of planned residential land.

The PEIR should explain how growth alternatives are being analyzed and what the baseline for those alternatives will be for purposes of impact analysis, since the General Plan Update does not establish land uses and does not set growth targets.

Marilyn Mirrasoul

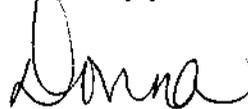
October 6, 2006

Page 5

An alternative to the imposition of a 1000-foot buffer also should be addressed in the PEIR. Rather than imposing a buffer, the PEIR should analyze how impacts from locating residential uses near industrial uses can be reduced to less-than-significant levels on a case-by-case basis, through CEQA review of individual projects. It is only at that stage of the process that the emissions from a particular industrial use and the mitigating measures available for that residential project are known. At a minimum, communities undergoing a community plan update should be exempt from the buffer requirements and should be able to take a comprehensive look at the best locations of industrial and residential uses, as well as other land uses, as part of the community plan update process, without being constrained by "prime industrial" designations or mandatory buffers. Thus, the PEIR should address an alternative that creates an exception from the buffer requirements for communities undergoing a community plan update.

We appreciate your consideration of our comments and look forward to seeing them addressed in the Final PEIR.

Very truly yours,



Donna D. Jones

for SHEPPARD, MULLIN, RICHTER & HAMPTON LLP

W02-WEST:8DDJ1400098624.1

cc: John Ponder, Esq.
David Nielsen, MNA Consulting



September 20, 2006

City of San Diego
Development Services
202 "C" Street
San Diego, CA 92101

Re: Preparation of Environmental Impact Report - City of San Diego
General Plan Update

Dear Development Services Staff:

The Industrial Environmental Association is an **organization of manufacturing**, technology and research and development companies. We have been active and engaged participants in the City of San Diego's General Plan Update.

In preparation of the environmental impact **report**, we respectfully ask that you consider the following:

***Guidance** from the California Office of Planning and Research regarding residential incompatibility with industrial areas;

***California** Air Resources Land Use Guidebook;

*Federal, state, and local required distance separations between industrial activities and sensitive receptors, including:

- adopted mandatory minimum distance separation for stationary source emissions and under study
- mandatory minimum distance separation with facilities using Drug Enforcement Agency controlled substances
- permitting agency distance separation reviews

Thank you for your consideration of our comments.

Sincerely,

Patti Krebs
Executive Director



From: "Shawna Anderson" <shawna@sdrp.org>
To: <mmirrasoul@sandiego.gov>
Date: 10/10/2006 10:31:00 AM
Subject: comment on General Plan update

Hi Marilyn,

Sorry this email is late and missed the Oct 7 deadline for comments for the General Plan EIR. I hope you can still consider our comment although it's really suggesting that the GP update incorporate the San Dieguito River Park Concept Plan as opposed to a comment regarding an EIR issue. The city council adopted our Concept Plan in June 2006 and it contains several goals and policies regarding preservation of the San Dieguito River Valley. I would like the EIR to address consistency between the General Plan update and the Concept Plan. Thank you!

Shawna

Shawna C. Anderson, AICP
Environmental Planner
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CITY OF SAN DIEGO

DEVELOPMENT SERVICES DEPARTMENT
ENVIRONMENTAL ANALYSIS SECTION (EAS)

PUBLIC SCOPING MEETING

This meeting is being held to give the public and interested parties an opportunity to submit comments regarding the potential environmental impacts of the proposed project. This information will be used to develop the scope and content of the proposed Program Environmental Impact Report (PEIR) for the project to be described at this meeting. Please record your comments in the space provided below and submit this form to City staff at the conclusion of the meeting. Thank You.

Project: General Plan Update

Date: September 25, 2006

Comments: All traffic studios must study
pedestrian & non-motorized traffic
volumes & traffic patterns. Traffic
study results must accurately and
honestly assess impacts upon pedestrian
and non-motorized traffic

Name Jim VARNADORE **Signature** 

Address Postoffice box 5859 SD CA 92165

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CITY OF SAN DIEGO

DEVELOPMENT SERVICES DEPARTMENT
ENVIRONMENTAL ANALYSIS SECTION (EAS)

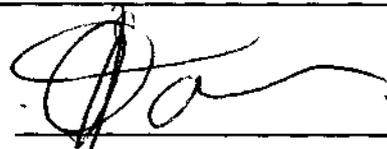
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Project: General Plan Update

Date: September 25, 2006

Comments: the GPU EIR must assess the
impact of the Village Strategy on
communities. The Strategic Framework
Element & many Element updates have
as their primary goals, the disproportionate
densification of poor communities, especially
poor communities of color, to the advantage
of wealthier, whiter communities.

Name Jim VARNADORE **Signature** 

Address _____

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CITY OF SAN DIEGO

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Project: General Plan Update

Date: September 25, 2006

Comments: The GPU EIR Must Assess the Future
Effects of Adding Density in the Poor
Communities without Adding Infrastructure
Such as Sidewalks, Parks, Playgrounds,
Cultural Venues, Adequate on-site parking,
And other needed infrastructure.

Name

Jim VARNADORE

Signature



Address

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CITY OF SAN DIEGO

DEVELOPMENT SERVICES DEPARTMENT
ENVIRONMENTAL ANALYSIS SECTION (EAS)

PUBLIC SCOPING MEETING

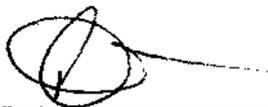
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Project: General Plan Update

Date: September 25, 2006

Comments: The GPU EIR MUST ASSESS THE TRAFFIC EFFECTS OF REFUSING TO PROVIDE PUBLIC TRANSIT IN WEALTHIER NEIGHBORHOODS AND COMMUNITIES. INADEQUATE PUBLIC TRANSPORTATION RELEGATES POOR AND DISABLED CITIZENS TO THE POORER COMMUNITIES WHICH DO HAVE PUBLIC TRANSIT. THIS WORKS TO SUBVERT THE COUNCIL POLICY ON "BALANCED COMMUNITIES" WHICH CALLS FOR HAVING A RANGE OF FAMILY INCOMES IN EVERY COMMUNITY.

Name Jim VARNADORE

Signature 

Address _____

Use back of sheet if additional space is necessary.



CITY OF SAN DIEGO

DEVELOPMENT SERVICES DEPARTMENT
ENVIRONMENTAL ANALYSIS SECTION (EAS)

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Project: General Plan Update

Date: September 25, 2006

Comments: THE GPU EIR MUST ASSESS THE DIS-
PROPORTIONATE EFFECT OF AIR POLLUTION IN
POOR COMMUNITIES, WHICH ARE DENSELY POPULATED,
COMPARED TO WEALTHY COMMUNITIES WHICH ARE NOT.

Name

Jim VARNADORE

Signature

Address

Use back of sheet if additional space is necessary.



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Project: General Plan Update

Date: September 25, 2006

Comments: THE GPU EIR MUST TAKE ACCOUNT
OF THE "CHOLLAS CREEK ENHANCEMENT
PLAN" AND THE PEIR THAT WAS
PREPARED FOR THAT PLAN

Name Jim VARNADORE

Signature 

Address _____

Use back of sheet if additional space is necessary.



CITY OF SAN DIEGO

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Project: General Plan Update

Date: September 25, 2006

Comments: THE GPU EIR MUST ASSESS THE IMPACTS OF THE CITY PARK & RECREATION DEPARTMENT'S CURRENT EFFORT TO FULFILL ITS DUTY TO PROVIDE ENOUGH PARK SPACE FOR THE POPULATION. THE DEPARTMENT IS TRYING TO ~~USE~~ ~~CONTRIBUTE~~ (1) REDUCE THE AVERAGE PER THOUSAND PEOPLE, (2) COUNT JOINT USE PARKS AGAINST THE REQUIREMENT, AND (3) COUNT REGIONAL PARKS AGAINST THE COMMUNITY AVERAGE REQUIREMENT. THAT HAS A HEALTH AND SAFETY IMPACT

Name Jim L'ARNAUD ARE **Signature** 

Address _____

Use back of sheet if additional space is necessary.

*Claudia Emerick's Comments for Speech
at 9/25/06 San Diego Convention*

The new General Plan needs to incorporate language regarding dog off-leash areas into the chapters involving Land Use and Community Planning, Noise, Traffic, Public Safety and especially Recreation.

The City is converting pre-existing neighborhood parkland into off-leash areas for dogs, without classifying off-leash areas in terms of whether they are passive or active use, exclusive use or shared use. Also, the City is not charging user fees, and there is no language to prevent the conversion of an entire park in response to the demands of politically-connected off-leash user groups. And in off-leash areas, dogs don't have to be licensed, or may not have received any of their shots. And **there's** insufficient funding for police, park rangers or animal control to effectively enforce these areas. The bottom line is that there this is insufficient enforcement for San Diego's off-leash areas, and its not right that all taxpayers pay for canine recreational areas.

Several parks have an off-leash areas that are 1 to 2 acres in size that are fenced. But we need language in the General Plan to protect neighborhood parks from being converted in their entirety by special interest groups. In 2002 and 2004, off-leash activists convinced City Council that their special canine children deserved all 5.4 acres of Grape Street Park in Golden Hill, making it the largest off-leash area in San Diego County, and the partial split rail fence **doesn't** prevent the dogs from leaving the park and impacting the homes right across the street. City Council allocated over **\$4,100** per acre per year for off-leash areas across the City, increasing Park & Rec's budget by about \$1- to \$200,000 annually .

So those who live in La Mesa or Carlsbad can off-leash their dogs in San Diego, they don't pay user fees, there's nobody to enforce the rules, and no **privilege** to take away when the rules are violated. So, in a City that can't keep swimming pools open year-round for children, dogs have free, year-round access. The City's parks have literally gone to the dogs.

We need **off-leash** areas to be defined in our General Plan - are they passive use or active use? Are they exclusive use or shared use? How close to homes should off-leash areas be? How much land is reasonable to convert to off-leash use in pre-existing neighborhood parks? What is a reasonable barrier to keep the dogs in the park? Who is primarily responsible for enforcing the rules when they are regularly broken? How much land should be available for off-leashing when the City's finances are in shambles? And why doesn't the city charge a fee for this activity?

The City needs to consider the creation of a regional, fee-based off-leash area, possibly siting it on Pershing Drive, on Balboa **Park's** Central Mesa. This would allow Grape St. Park, and all neighborhood parks, to be available primarily for people - especially in older, urban neighborhoods.

Appendix B:

Vehicular Greenhouse Gas Emissions Calculation Table

**Appendix B
Vehicular Greenhouse Gas Emissions**

Year	Daily VMT ¹	Annual VMT	Fuel Economy (MPG) ²	Total Gasoline Consumption (gallons)	Emission Factors (Lbs./Gallon of Gasoline) ³			Total Vehicular Emissions by GHG (tons)			Global Warming Potential ⁴			Carbon Dioxide Equivalent Emissions (tons)			Total Vehicular GHG Emissions (tons)
					CO ₂	CH ₄	N ₂ O	CO ₂	CH ₄	N ₂ O	CO ₂	CH ₄	N ₂ O	CO ₂	CH ₄	N ₂ O	
1990	30,583,000	11,162,795,000	20.300	549,891,379	19.564	0.00055	0.00020	5,379,037.47	151	55	1	23	300	5,379,037	3,478	16,497	5,399,012
2005	35,014,269	12,780,208,185	21.739	587,893,104	19.564	0.00055	0.00020	5,750,770	162	59	1	23	300	5,750,770	3,718	17,637	5,772,126
2006	35,330,273	12,895,549,645	21.833	590,644,879	19.564	0.00055	0.00020	5,777,688	162	59	1	23	300	5,777,688	3,736	17,719	5,799,143
2020	39,754,333	14,510,331,399	22.779	637,004,759	19.564	0.00055	0.00020	6,231,181	175	64	1	23	300	6,231,181	4,029	19,110	6,254,320
2030	42,914,375	15,663,746,875	22.893	684,215,563	19.564	0.00055	0.00020	6,692,997	188	68	1	23	300	6,692,997	4,328	20,526	6,717,851

1. Section 3.15, Transportation/Traffic.

2. California Department of Transportation, California Motor Vehicle Stock, Travel and Fuel Forecast, December 2005.

3. Bay Area Air Quality Management District, Source Inventory of Bay Area Greenhouse Gas Emissions, November 2006.

4. Robert Henson, The Rough Guide to Climate Change, September 2006.

5. San Diego Association of Governments, 2030 Regional Growth Forecast Update, City of San Diego, September 2006.

Appendix C:
Comment Letters and Responses

APPENDIX C: DRAFT GENERAL PLAN PEIR COMMENT LETTERS

The following comment letters were received from agencies, organizations and individuals during the public review of the draft PEIR. A copy of each comment letter along with corresponding staff responses has been included. Many of the comments did not address the adequacy of the environmental document; however, staff endeavored to provide responses as appropriate as a courtesy to the commenters. Both the October 2006 Draft General Plan and the draft PEIR have been revised in response to these letters. However, the revisions do not affect the adequacy of the environmental document.

Letter No.	Author	Address	Date	Representing	Page Number of Letter
FEDERAL					
A.	Thornton, C.L.	P.O. Box 452000 San Diego, CA 92145-2000	June 11, 2007	United States Marine Corps	1-5
STATE					
B.	Goldberg, Sandra	1515 Clay Street 20 th floor P.O. Box 70550 Oakland, CA 94612-0550	June 11, 2007	California Department of Justice Attorney General Edmund G. Brown Jr.	6-12
C.	Roberts, Terry	1400 Tenth Street P.O. Box 3044 Sacramento, CA 95812-3044	June 12, 2007	California State Clearinghouse	13-16
D.	Singleton, Dave	915 Capitol Mall, Room 364 Sacramento, CA 95814	June 4, 2007	California Native American Heritage Commission	17-20
E.	Mulligan, Michael	4949 Viewridge Avenue San Diego, CA 92123	June 18, 2007	California Department of Fish and Game	21-25
F.	Munoz, Rosa	320 West 4 th St., Suite 500 Los Angeles, CA 90013	June 7, 2007	California Public Utilities Commission	26
G.	Frost, Paul	5816 Corporate Avenue, Suite 200 Cypress, CA 90630-4731	May 24, 2007	California Department of Conservation	27-28
LOCAL					
H.	Gibson, Eric	5201 Ruffin Road, Suit B San Diego, CA 92123-1666	June 11, 2007	County of San Diego Department of Planning &	29-34

				Land Use	
I.	Nicholson, Robert W.	6401 Linda Vista Road, San Diego, CA 92111-7399	May 10, 2007	San Diego County Office of Education	35-36
J.	Lyon, Jim	13325 Civic Center Dr. P.O. Box 789 Poway, CA 92074-0789	June 8, 2007	City of Poway	37
K.	Kush, Melanie	10601 Magnolia Avenue, Santee, CA 92071	June 13, 2007	City of Santee	38-40
L.	Munoz, Rafael L.	84 East J. Street, Chula Vista, CA 91910	May 30, 2007	Chula Vista Elementary School District	41
M.	Vance, Stephan M.	401 B. Street, San Diego, CA 92101-4231	June 11, 2007	SANDAG	42
ORGANIZATIONS/INDIVIDUALS					
N.	Schroeder, Paul E.	233 A. Street, Suite 200 San Diego, CA 92101	June 1, 2007	AIA San Diego	43-51
O.	Schroeder, Paul E.	233 A. Street, Suite 200 San Diego, CA 92101	June 24, 2007	AIA San Diego	52-62
P.	Alevy, Scott D.	402 West Broadway Suite 1000 San Diego, CA 92101-3585	May 30, 2007	San Diego Regional Chamber of Commerce	63-66
Q.	Molloy, Scott C.	9201 Spectrum Center Blvd, STE 110 San Diego CA 92123-1407	June 25, 2007	Building Industry Association of San Diego	67-75
R.	Benson, Laura M.	401 Mile of Cars Way, National City, CA 91950	June 11, 2007	Environmental Health Coalition	76-83
S.	Briggs, Linda L.	3820 Ray Street, San Diego, CA 92104-3623	June 25, 2007	Sierra Club San Diego Chapter	84-99
T.	Borak, Livia	P.O. Box 7745, San Diego, CA 92167	June 25, 2007	Center for Biological Diversity	100-118
U.	Royle, James W. Jr.	P.O. Box 81106, San Diego, CA 92138-1106	June 9, 2007	San Diego County Archeological Society, Inc.	119-121
V.	Lucas, Carmen	P.O. Box 775 Pine Valley CA 91962-0775	June 15, 2007	Herself	122-124

W.	Coyle, Courtney	Held-Palmer House 1609 Soledad Avenue La Jolla, CA 92037-3817	June 25, 2007	Carmen Lucas, Waaymii Laguna Band of Indians	125-131
X.	White, Frisco	c/o MNA Consulting 427 C. Street, Suite 308 San Diego, CA 92101	June 12, 2007	Carmel Valley Community Planning Board	132-136
Y.	Willis, Ellen	15721 Bernardo Heights Parkway, Suite B-230 San Diego, CA 92128	June 11, 2007	Rancho Bernardo Community Planning Board	137-140
Z.	Flores, David	1319 5 th Avenue, Chula Vista, CA 91910-4013	June 8, 2007	San Ysidro Planning & Development Group	141-151
AA.	Jones, Donna D.	501 West Broadway 19 th floor San Diego, CA 92101-3598	June 25, 2007	Otay Mesa Planning Coalition	152-155
BB.	Ponder, John E.	501 West Broadway 19 th floor San Diego, CA 92101-3598	June 25, 2007	Otay Mesa Planning Coalition	156-176
CC.	DeLano, Everett	220 W. Grand Avenue, Escondido, CA 92025	June 20, 2007	Friends of San Diego	177-182
DD.	Hawley-Brandt, Susan	Chauvet House P.O. Box 1659 Glen Ellen, CA 95442	June 25, 2007	Save Our Heritage Organisation	183-189
EE.	Warren, Bruce H.	3511 Camino Del Rio South, Suit 403, San Diego, CA 92108	June 7, 2007	EnviroMINE, Inc.	190
FF.	Campbell, Lee	10857 Viacha Drive, San Diego, CA 92124-2601	June 24, 2007	Himself	191-219
GG.	Germain, Eric	c/o Tierrasanta Library 4985 La Cuenta Drive, San Diego, CA 92124-2601	June 25, 2007	Himself	220-221
HH.	Thomas, Carolyn R.	1313 Park Boulevard, San Diego, CA 92104-4712	June 7, 2007	Herself	222
II.	Berkman, Randy	P.O. Box 7098	June 11, 2007	Himself	223-224

		San Diego, CA 92167			
JJ.	Robinson-Wood, Rebecca	12625 Caminito Radiante San Diego, California 92130	June 11, 2007	Herself	225-231
KK.	Haase, Stephen	12531 High Bluff Drive, San Diego, CA 92130	June 25, 2007	National Association of Industrial and Office Properties	232-233
LL.	Holmes, Greg	5796 Corporate Avenue Cypress, CA 90630	July 3, 2007	Department of Toxic Substances Control	234-238

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UNITED STATES MARINE CORPS
MARINE CORPS AIR STATION
P.O. BOX 462000
SAN DIEGO, CA 92145-2000

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June 11, 2007

CITY OF SAN DIEGO
DEVELOPMENT SERVICES DEPARTMENT
ATTN: MS. MARILYN MIRRASOUL
1222 FIRST AVENUE, MS 501
SAN DIEGO CA 92101

A-1

RE: DRAFT PROGRAM ENVIRONMENTAL IMPACT REPORT, CITY OF SAN DIEGO
DRAFT GENERAL PLAN; PN 104495, SCH NO. 2006091032

Dear Ms. Mirrasoul,

Thank you for the opportunity to provide comment on the City of San Diego Draft Program Environmental Impact Report for the City of San Diego Draft General Plan Update. As a member of this community, Marine Corps Air Station (MCAS) Miramar shares your concerns on all quality of life issues.

The Station continues to manage its resources in full compliance with the law and will continue to do so in the future. Such compliance, however, has created significant limitations. Constraints on MCAS Miramar include, but are not limited to, sensitive resources or habitat, regional transportation and infrastructure requirements and most important, the United States Marine Corps (USMC) mission essential training and readiness requirements to meet national security objectives.

In 2002, the State of California enacted legislation that requires General Plans of local jurisdictions to provide for compatible land use planning in surrounding communities affected by military operations. This was codified into law within the Public Utilities Code (Section 21675) as: "...land use guidelines will be consistent with the Air Installations Compatible Use Zones (AICUZ) recommendations of that military airport". As such, it is critical that these recommendations be incorporated into the revised General Plan as quickly as possible once the update of the MCAS Miramar Airport Land Use Compatibility Plan (ALUCP) is completed.

For the USMC to lose additional land or flexibility in the San Diego region would be highly detrimental to the current

A-1 Public Utilities Code (PUC) Section 21675 (b) states:

The (airport land use) commission shall include, within its airport land use compatibility plan formulated pursuant to subdivision (a), the area within the jurisdiction of the commission surrounding any military airport for all of the purposes specified in subdivision (a). The airport land use compatibility plan shall be consistent with the safety and noise standards in the Air Installation Compatible Use Zone prepared for that military airport. This subdivision does not give the commission any jurisdiction or authority over the territory or operations of any military airport.

The San Diego County Regional Airport Authority, as the Airport Land Use Commission (ALUC) for San Diego County, is in the process of preparing a comprehensive update to the MCAS Miramar Airport Land Use Compatibility Plan (ALUCP). The ALUC is preparing the draft ALUCP update for MCAS Miramar consistent with the safety and noise standards published in the 2005 Air Installation Compatible Use Zone (AICUZ) study for MCAS Miramar as required by PUC sec 21675(b) and as commented in your letter.

As addressed by the PEIR in Sections 3.5 and 3.10, once the ALUC adopts the ALUCP consistent with the AICUZ study for MCAS Miramar, the City will submit the General Plan and affected community plans and specific plans to the ALUC for a consistency determination with the updated ALUCP as required by the PUC. As dictated by state law, the City will take steps to amend its land use plans and zoning ordinances to implement the ALUCP as recommended by the ALUC or the City Council can overrule ALUC determination by making the required findings with a 2/3rds vote.

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operational tempo and future training. In view of the unique and irreplaceable nature of the Station and the unknowns of future requirements, maximum flexibility on land use must be maintained. Comments on sections relevant to MCAS Miramar have been provided for your reference purposes (Enclosure (1)).

Thank you for the opportunity to review this environmental impact report. If we may be of any further assistance, please contact Mr. Juan Lias at (858) 577-6603.

Sincerely,



C. L. THORNTON
Community Plans and Liaison Officer
By direction of the Commanding Officer

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GENERAL COMMENTS

1. Health and Safety (Section 3.5)

A-2 a. General Comment: This section fails to mention that all AICUZ documents also include a safety/land use compatibility matrix (Table 3). This matrix is used by the USMC to determine the land use compatibility of projects within MCAS Miramar Accident Potential Zones (APZ). While the majority of uses are typically consistent, there have been development projects in the past that were deemed consistent by the City of San Diego and considered inconsistent by the USMC. We would appreciate if staff could somehow address this issue in this section's text.

2. Noise (Section 3.10)

A-3 a. General Comment: This section fails to mention that all AICUZ documents also include a noise/land use compatibility matrix (Table 2). This matrix is used by the USMC to determine the noise compatibility of projects in the vicinity of MCAS Miramar. While the majority of uses are typically consistent, there have been development projects in the past that were deemed consistent by the City of San Diego and considered inconsistent by the USMC. We would appreciate if staff could somehow address this issue in this section's text.

ITEMIZED COMMENTS

1. Health and Safety (Section 3.5)

A-4 a. Page 3.5-7, 5th paragraph, 3rd sentence: The 1977 AICUZ document was the first AICUZ published for this facility, but the current APZ boundaries are taken from the 1992 update which was published by the Department of Navy and are currently being used by the City of San Diego and Airport Land Use Commission (ALUC). Please change the sentence to reflect these comments.

A-5 b. Page 3.5-7, 5th paragraph, 4th sentence: Recommend that you insert the criteria in parenthesis at the end of the sentence (as of December 2002 OPNAV INSTRUCTIONS 11010.36B).

3

ENCLOSURE (1)

A-2 The City has added the following sentence in PEIR Section 3.5:
The matrix in the AICUZ study shows the land use compatibility for proposed development projects within APZs.

A-3 The City has added the following discussion to PEIR Section 3.10:

The Airport Authority will be including the projected noise contours shown on Figures 3.10-5 3.10-6 and 3.10-7 for SDIA, Montgomery Field, Brown Field, and MCAS Miramar respectively in the updated ALUCPs. The projected noise contour data for MCAS Miramar is from the 2005 Air Installation Compatible Use Zone (AICUZ) Study for MCAS Miramar. The projected noise data for NAS North Island is from the published 1984 AICUZ study. For NOLF Imperial Beach, the projected noise data is from the 1989 AICUZ study. The U.S. Navy is in the process of preparing updated AICUZ studies with updated noise contours for NAS North Island and NOLF Imperial Beach, which are currently not available.

The AICUZ studies for all the installations contain noise - land use compatibility matrices. The military uses the AICUZ study matrix to determine the noise compatibility of proposed development projects AICUZ study area for each air installation. The Airport Authority will be incorporating the noise contours and the noise - land use compatibility matrix criteria from the published 2005 MCAS Miramar AICUZ study and the updated AICUZ studies for NAS North Island and NOLF Imperial Beach when published into the updated and new ALUCPs for those military air installations.

A-4 The PEIR Section 3.5 states the following: For MCAS Miramar, the APZs are incorporated in the adopted ALUCP from the Air Installation Compatible Use Zone (AICUZ) study published by the Navy in 1977. At the end of this sentence, the City has added the following: "and updated in 1992." The PEIR states the following: The adopted ALUCP for MCAS Miramar identifies compatible uses and provides criteria for future uses proposed in the APZs. Before criteria, the City has added the following: "a safety land

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use/compatibility matrix.” The City has added the following: *The City uses the APZ boundaries to implement the safety land use/compatibility matrix criteria in the community plans for Mira Mesa, Torrey Pines, and University and the AEOZ.*

- A-5 The City has placed the recommended reference in the notes and references at the end of PEIR Section 3.5.

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- A-6 c. Page 3.5-8, 1st paragraph, 1st sentence: Change Marine Corps to United States Marine Corps.
- A-7 d. Page 3.5-8, 2nd paragraph, 2nd sentence: The Federal Aviation Administration (FAA) project evaluation process also examines Terminal Instrument Procedures (TERPS) surfaces for obstruction and safety issues. Recommend that the sentence read: "...Part 77 and TERPS obstruction standards..."
- A-8 e. Page 3.5-14, 2nd paragraph, 2nd and 4th sentences: Recommend that the word "TERPS" be added after imaginary and before surfaces.
- A-9 f. Figure 3.5-5: Recommend that the March 2005 MCAS Miramar AICUZ APZs be placed on this figure or that the text references them in some fashion to avoid confusion between present and future APZs.
- A-10 g. Figure 3.8-4: Recommend that all Restrictive Use Easements (RUE) areas be shown on this figure. These areas are purchased easement rights that belong to the federal government and are administered locally by the USMC. Any proposed development requires adherence to specific RUE development conditions and should not be undertaken without concurrence from the USMC. For these reasons, we believe it is appropriate to depict these areas on this map.
2. Noise (Section 3.10)
- A-11 a. Figure 3.10-3: This map shows the incorrect noise contours from the draft 2005 MCAS Miramar ALUCP. Request that the noise contours currently used by the City of San Diego and ALUC for project determinations be shown instead. Figure 3.10-6 shows the correct current noise contours which are consistent with the 2005 MCAS Miramar AICUZ.

- A-6 The City has added "United States" before Marine Corps in the sentence in PEIR Section 3.5 as referenced by the comment letter.
- A-7 The City has added "Terminal Instrument Procedures (TERPS)" after Part 77 in the following sentence in PEIR Section 3.5: The FAA uses Part 77 and obstruction standards as elevations above which structures may constitute a safety problem. The City has also added the following sentence to the paragraph referenced: *The FAA examines the TERPS surfaces for obstructions and safety issues as part of the obstruction evaluation for a proposed project.*
- A-8 The City has added "TERPS" after the words "imaginary" and before the word surfaces in the sentences in PEIR Section 3.5 as referenced by the comment letter.
- A-9 The City has added "used by the adopted ALUCP currently in place" after "APZs" in the following sentence in PEIR Section 3.5: The APZs affect property located off the MCAS Miramar property in the Mira Mesa, Torrey Pines and University communities as shown on Figure 3.5-6.
- A-10 The City has added the following discussion of the restrictive use easements as addressed by the AICUZ study in Section 3.5: *"The federal government has Restrictive Use Easements (RUE) on property adjacent to MCAS Miramar that serve to limit the type and intensity of development as shown on Figure 3.5-6. Any proposed development requires adherence to specific RUE development conditions and should not be undertaken without concurrence from the United States Marine Corps."* The City has also added the RUE areas to Figure 3.5-6.
- A-11 The City has added "Existing" to the title for Figure 3.10-3 in PEIR Section 3.10. The City has also added the following note on Figure 3.10-3: *The Community Noise Equivalent Level (CNEL) contours represent average annual day flight operations for 2001. The source of this data as noted on the Figure is from the MCAS Miramar Noise Study (Nov 2004) for the 2005 Air Installation Compatible Use Zone Study.*

ENCLOSURE (7)

EDMUND G. BROWN JR.
Attorney General

State of California
DEPARTMENT OF JUSTICE



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June 11, 2007

By Electronic Mail and Telesony

Marilyn Mirrasoul, Environmental Planner
City of San Diego Development Services Center
1222 First Avenue, MS 501
San Diego, CA 92101

RE: Comments on Draft Environmental Impact Report for City of San Diego Draft
General Plan, Project No. 104495, SCH No. 2006091032

Dear Ms. Mirrasoul:

The Attorney General submits these comments on the Draft Environmental Impact Report ("DEIR") for the City of San Diego Draft General Plan ("General Plan"). The Attorney General provides these comments pursuant to his independent power and duty to protect the natural resources of the State from pollution, impairment, or destruction in furtherance of the public interest. (See Cal. Const., art. V, § 13; Cal. Gov. Code, §§ 12511, 12600-12; *D'Amico v. Board of Medical Examiners*, 11 Cal.3d 1, 14-15 (1974)). These comments are made on behalf of the Attorney General and not on behalf of any other California agency or office.

Introduction.

We commend the City for its efforts to address global warming. The City has shown leadership in this area by adopting a Climate Protection Action Plan ("Climate Action Plan"), signing the U.S. Mayor's Climate Protection Agreement, which commits the City to meet greenhouse gas ("GHG") reduction targets in the Kyoto Protocol, and adopting numerous "smart growth" planning measures. Obviously, the City recognizes that global warming is a serious problem that cities can help to address. We believe the new General Plan provides an opportunity for the City to continue to be a leader in California's fight against global warming.

We also commend the City for including in the DEIR a clear discussion of global warming, quantification of the project's GHG emissions, and recognition that those emissions constitute a significant cumulative environmental impact. We urge the City, however, to evaluate and, where feasible, in the EIR and General Plan adopt a broader range of enforceable mitigation measures to reduce GHG emissions from the new development authorized in the General Plan. Many of the policies in San Diego's General Plan are voluntary, which makes it impossible both to know what the GHG impacts will be, and to know whether the City has adopted all feasible mitigation measures. In some respects, the proposed General Plan reads more as a statement of preferences and opinions, rather than a definite commitment to adopt and enforce policies and specific

Marilyn Mirrasoul
 June 11, 2007
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standards, or to use the powers the City has to enact ordinances and control development characteristics.¹

The DEIR Recognizes Global Warming Impacts as a Significant Cumulative Impact of the Project that Must Be Mitigated.

The Cumulative Impacts section of the DEIR explains how GHG emissions cause global warming, the expected serious health and environmental impacts from global warming, the actions of the state that require reductions of GHG emissions (Assembly Bill 32 and Executive Order S-3-05), and the City of San Diego's programs to reduce its own GHG emissions. It discusses the City's Climate Action Plan, which requires a 15% reduction of GHG emissions from City operations by 2010. While the City has shown leadership by adopting the Climate Action Plan, the DEIR notes that most of the emission reduction measures in that Plan do not apply to the type of discretionary development addressed in the General Plan. The Climate Action Plan primarily addresses municipal GHG emissions, which represent only about 2% of total GHG emissions in the City, while 98% of emissions result from City residences and businesses.

B-1 The DEIR indicates that the development authorized in the General Plan is expected to accommodate 361,110 new residents and an increase of 7 million vehicle miles per day. The DEIR correctly concludes that, even with mitigation, at the program level of analysis, the cumulative impacts of GHG emissions from the development that is anticipated to occur under the General Plan is considered significant and unavoidable. The DEIR states that where mitigation is "determined to be necessary and feasible" mitigation measures to limit GHG emissions will be required for specific projects carried out under the General Plan. The DEIR then identifies only two specific global warming mitigation measures, but does not state that these measures will be adopted as part of the General Plan. If these mitigation measures (and other feasible measures) are not included as enforceable General Plan policies, and are not currently required by City ordinances, the City has no ability under the General Plan to impose these measures on future projects.

B-2 One of the global warming mitigation measures identified in the DEIR is that development conform to the "City of Villages" development strategy to the extent feasible. The City of Villages development strategy is already included in the General Plan. However, revisions to the "City of Villages" development strategy included in the General Plan may be needed to make sure that it is not optional, but rather, imposes binding, enforceable requirements that constitute adequate mitigation under CEQA. The other identified measure is to "include the minimization of GHG emissions to the extent feasible as an important design criterion during the pre-application and development review process." As the DEIR notes, although the proposed General Plan includes some binding policies that will reduce GHG emissions, many of the relevant policies in the Plan only express support for actions that would reduce GHG emissions.

1. The general plan should include "standards" and "proposals" along with the more general policies, objectives and principles. Government Code § 65302.

B-1

City staff and Deputy Attorney General Sandra Goldberg attended a meeting on June 27, 2007 to discuss the Attorney General letter dated June 11, 2007 regarding the global warming discussion of the General Plan DEIR. At this meeting, the City and Ms. Goldberg agreed that the City should edit the Draft General Plan to strengthen climate change policies and to take steps to ensure that the policies are implemented and enforced.

The City has taken the following approach to address the comments on the City's obligation under CEQA to adopt feasible alternatives and mitigation measures made in the June 11, 2007 Attorney General letter: (1) modify the policy language of the October 2006 Draft General Plan to expand and strengthen climate change policies; (2) ensure that policies to reduce greenhouse gas (GHG) emissions are imposed on future development and City operations by incorporating them into the Mitigation Monitoring and Reporting Program (MMRP) for the Final EIR; and (3) initiate work on a General Plan Action Plan to identify measures such as new or amended regulations, programs and incentives to implement the GHG reduction policies.

Based on this approach, the Conservation Element of the General Plan has been revised to: incorporate an overview of climate change; discuss existing state and City actions to address climate change impacts; and establish comprehensive policies that would reduce the GHG emissions of future development, the existing community-at-large, and City operations. A key new Conservation Element policy is to "reduce the City's carbon footprint" and to "develop and adopt new or amended regulations, programs and incentives as appropriate to implement the goals and policies set forth" related to climate change (CE-A.2). Additional policies have been added to "collaborate with climate science experts" to allow informed public decisions (CE-A.3) and to "regularly monitor and update the City's Climate Protection Action Plan (CE-A.13)." The overall intent of these new policies is to unequivocally support climate protection actions, while retaining flexibility in the design of implementation measures which could be influenced by technological advances, environmental conditions, state and federal legislation, or other factors.

In addition, the Draft General Plan Land Use and Community Planning; Mobility; Urban Design; and Public Facilities, Services, and Safety elements have been edited to better support GHG reduction and climate change adaptation goals. These elements contain policy language related to sustainable land use patterns, alternative modes of transportation, energy efficiency, water supply, and GHG emissions associated with landfills. The General Plan also calls for the City to employ sustainable building techniques, minimize energy use, maximize waste reduction and diversion, and implement water conservation measures. The City's efforts to reduce GHG emissions are further bolstered by existing City programs including the Sustainable Community Program, the Climate Protection Action Plan, the Environmentally Preferable Purchasing Program, and numerous City Council policies addressing resource conservation and management.

COMMENTS

Marilyn Mirrasoul
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Page 3

but do not require those actions; because they are not enforceable requirements, they do not constitute mitigation under CEQA. (Pub. Res. Code § 21081.6(b)).² We also believe that there are additional actions to reduce GHG emissions that the City should consider and adopt if they are feasible.

The DEIR identifies two "environmentally superior" alternatives to the proposed General Plan. One alternative would reduce energy and waste-related GHG emissions of new development, and the other would reduce GHG emissions associated with vehicle use.

The City as lead agency is required under CEQA to adopt all feasible alternatives and mitigation measures.

The City has determined in the DEIR that the global warming-related impacts of the General Plan are cumulatively significant. This triggers the lead agency's obligation to require feasible mitigation. (Pub. Res. Code, § 21002.1(b)). The EIR must "examine reasonable, feasible options for mitigating or avoiding the project's contribution" to the problem. (Cal. Code Regs., tit. 14, § 15130, subd. (b)(5).)

CEQA mandates that public agencies should not approve projects with significant environmental effects if there are feasible alternatives or mitigation measures that can substantially lessen or avoid those effects.³ CEQA requires "[e]ach public agency [to] mitigate or avoid the significant effects on the environment of projects that it carries out or approves *whenever it is feasible to do so*."⁴ The agency must ensure that "measures to mitigate or avoid significant effects on the environment are fully enforceable through permit conditions, agreements, and other measures."⁵

2. For example, the only policy in the General Plan that expressly refers to GHG emissions states: "Support state, federal, and local efforts to increase fuel efficiency and reduce greenhouse gas emissions." This policy does not impose any enforceable obligations to design or build new development in a way that minimizes GHG emissions.

3. Public Resources Code §§ 21002, 21081; see also, *Mountain Lion Foundation v. Fish and Game Commission* (1997) 16 Cal.4th 105, 134.

4. *City of Marina Board of Trustees* (2006) 39 Cal.4th 341, 360 (emphasis added); Pub. Resources Code § 21002.1(b).

5. Pub. Res. Code, § 21081.6; *Federation of Hillside and Canyon Associations v. City of Los Angeles* (2000) 83 Cal.App.4th 1252, 1261.

RESPONSES

B-1 (continued)

To ensure that policies to reduce GHG emissions are imposed on future development, the policies are incorporated into the Mitigation Monitoring and Reporting Program (MMRP) for the Final EIR. Pursuant to CEQA Guidelines §15097(b), regarding mitigation monitoring, "Where the project at issue is the adoption of a general plan, specific plan, community plan or other plan-level document, the monitoring plan shall apply to policies and any other portion of the plan that is a mitigation measure or adopted alternative. The monitoring plan may consist of policies included in plan-level documents."

Staff is currently preparing a General Plan Action Plan that identifies a comprehensive work program of measures to implement the policies of the General Plan, including the policies that reduce GHG emissions of future development. The implementation measures would include the development of regulations, programs, incentives, master plans, community plan updates or other specific actions to implement the policies of the General Plan, and identify the parties responsible for implementation and the implementation time frame. Due to the complexity and interrelationship between the General Plan policies and issues related to global warming, it is anticipated that it would take at least one year to several years to adopt all of the measures to be included within the implementing Action Plan. While the implementation measures identified in the General Plan Action Plan are prepared, the General Plan policies identified in the MMRP would be imposed on future development and the Climate Protection Action Plan would continue to be implemented (updates to the Climate Action Plan are to occur per the new Policy CE-A.13 as discussed above).

In order to monitor the progress and effectiveness of General Plan policies and implementation measures, the City will prepare and submit an annual report on the status of the General Plan and progress in the implementation of the General Plan policies ("the annual report") to the City Council, Governor's Office of Planning and Research (OPR) and the Department of Housing and Community Development (HCD) as mandated by Government Code §65400(b)(1). The annual report shall include a discussion of progress in the implementation of the specific goals and policies of each general plan element, including policies that reduce GHG emissions. The annual report will also be used to develop a longer-term evaluation of the General Plan and to determine the need for updating any element or policy prior to a comprehensive update. To ensure that the City prepares and submits the annual report, compliance with Government Code §65400(b)(1) is included in the MMRP for the Final PEIR consistent with CEQA Guidelines §15097(b).

B-2

The City of Villages development strategy policies found in the Land Use and Community Planning Element, Section A, were strengthened to address this comment and included in the MMRP to ensure that these policies are imposed on future development consistent with CEQA Guidelines §15097(b). Furthermore, as discussed in the response to comment B-1, the City has incorporated the revised policies of the General Plan that reduce GHG emissions into the MMRP for the Final EIR to ensure that future development incorporates measures that "minimize GHG emissions."

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 June 11, 2007
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The City Should Adopt Enforceable Mitigation Measures to Reduce the GHG Emissions.

As noted above, CEQA requires adoption of enforceable mitigation measures to reduce the significant impacts of a project. Accordingly, the policies in the proposed General Plan that express "support" for measures that would reduce GHG emissions should be revised to establish enforceable requirements. The potential revisions could include:

- B-3** o Change the proposed policy that the City will "encourage" sustainable or green building to require that new buildings and major renovations incorporate all feasible green building design principles and building materials. (This policy could require compliance with the U.S. Green Building Council's Leadership in Energy and Environmental Design silver standard, which is the standard required for municipal buildings under the City's own Climate Action Plan and for state buildings under Executive Order No. 5-20-04).⁶
- B-4** o Change the proposed policy that the City will "encourage" sustainable landscape design and maintenance to require that new development must meet these criteria.
- B-5** o Change the proposed policy to "strive for" site design to minimize energy use by taking advantage of sun-shade patterns, prevailing winds, landscaping and sunscreens to require new development to meet these criteria.
- B-6** o Change the proposed policy to "support" self-generation of energy using renewable technologies to require that new residential development of more than 6 units shall participate in the California Energy Commission's New Solar Homes Partnership (this program provides rebates to developers of 6 units or more who offer solar power on 50% of the new units)⁷ and new or major renovations of commercial or industrial development (that exceeds a certain square foot minimum) must incorporate renewable energy generation to provide the maximum feasible amount of the project's energy needs.
- B-7** o Modify the proposed policy to "develop and adopt" an Urban Heat Island Mitigation policy (at some unspecified time) to impose an enforceable requirement to address this impact by using light-colored and reflective roofing materials and paint; light-colored roads and parking

6. Alternatively, feasible green building measures can be identified using the California Energy Commission's Compliance Manuals (for Residential and Nonresidential Buildings) (www.energy.ca.gov/title24/2005standards/) to identify energy savings that exceed the 2005 Building Energy Efficiency Standards; the cost effectiveness of these measures can be evaluated using the Life Cycle Cost Assessment Model (www.green.ca.gov/LCCA/FactSheet.htm and www.green.ca.gov/EnergyEff/roi/default.htm) developed by the California Department of General Services.

7. See: www.gosolarcalifornia.ca.gov/nshp/

- B-3
The referenced policy has been reviewed and revised. See General Plan Policy CE-A.5.
- B-4
The referenced policy has been reviewed and revised. See General Plan Policy CE-A.11.
- B-5
The referenced policy has been reviewed and revised. See General Plan Policy CE-A.6.
- B-6
The referenced policy has been reviewed and revised. See General Plan Policy CE-A.6. The Action Plan will identify the specific implementation of this policy.
- B-7
The referenced policy has been reviewed and revised. See General Plan Policy CE-A.12. Also see Policy CE-A.11.d edits.

Marilyn Mirasoul
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lots; shade trees in parking lots; and shade trees on the south and west sides of new or renovated buildings.⁸

B-8 o Adopt requirements for expanding waste minimization efforts as recommended in the City's Climate Action Plan to address construction and demolition recycling, commercial paper recycling, and multiple family recycling. These recycling requirements can be included in the General Plan now, and later replaced by any applicable ordinances that may be adopted or become effective. For example, the General Plan could require that construction projects use all feasible opportunities to recycle unused construction materials and that demolition projects submit a plan to maximize reuse of building materials, along with the required permit application. Information about these measures is available from many sources, including: www.epa.gov/epaoswer/non-hw/debris-new/index.htm

B-9 o Review the "City of Villages" development strategy included in the General Plan and make any revisions that are necessary to ensure that it imposes binding, enforceable requirements that constitute adequate mitigation under CEQA.

In addition, we note that there appear to be additional feasible policies to reduce GHG emissions that should be analyzed in the EIR. Some of these policies could also provide public health benefits by reducing ozone levels (the City has not attained the state one-hour ozone standard or federal eight-hour ozone standard).⁹ Some examples include:

B-10 o Require that off-road diesel-powered vehicles used for construction should be new low-emission vehicles, or use retrofit emission control devices, such as diesel oxidation catalysts and diesel particulate filters verified by the California Air Resources Board.¹⁰

B-11 o Add a policy to require that new residences use all Energy Star rated appliances and the

8. Information about feasible measures are available from numerous sources, including the Lawrence Berkeley National Laboratory "Cool Roofing Materials Database" prepared by the Laboratory's Heat Island Project (<http://ctd.lbl.gov/coolroof/>) and EPA's Heat Island site: www.epa.gov/heatisland/

9. The U.N. Intergovernmental Panel on Climate Change notes that "near-term health co-benefits from reduced air pollution as a result of actions to reduce GHG emissions can be substantial and may offset a substantial fraction of mitigation costs." IPCC Fourth Assessment Report, Working Group III, Summary for Policymakers, Mitigation of Climate Change, at p. 16.

10. See, www.arb.ca.gov/diesel/verdev/verdev.htm and www.epa.gov/ispd/pdf/emission_0307.pdf This requirement was applied to construction at LAX and O'Hare International Airports. See, www.oharemodernization.org (Sustainable Design Manual, §8.5) and www.lexmasterplan.org/cb_CBA_Exhibits.cfm. (Section X, F.) This would also reduce exposure to diesel particulate exhaust, a known carcinogen and toxic air contaminant. See "Digging Up Trouble: Health Risks of Construction Pollution in California" (Union of Concerned Scientists, November 2006).

B-8

The General Plan provides policy direction on minimizing waste, waste management and recycling in the Conservation Element Section A, Climate Change and Sustainable Development; and in the Public Facilities, Services and Safety Element Section I, Waste Management. Policies have been reviewed and revised. See General Plan Policy PF-I.1 and PF-I.2, and Policies CE-A.8 and CE-A.9. In addition, the City is in the process of implementing a Construction and Demolition Debris Diversion Ordinance. To further address diverting materials from the waste stream within the City limits, the City is in the process of discussing the City Recycling Ordinance which would require single family, multi-family, commercial and mixed-use facilities to recycle at a minimum: plastic bottles and jars, paper, newspaper, metal containers, cardboard, and glass containers.

B-9

As discussed in the response to Comment B-2, the City of Villages development strategy policies were strengthened within the General Plan and included in the MMRP to ensure that these policies are imposed on future development. In addition, the following language was added to the Land Use and Community Planning Element Section A to address the citywide importance of the City of Villages strategy: "Implementation of the City of Villages strategy is an important component of the City's strategy to reduce local contributions to greenhouse gas emissions, because the strategy makes it possible for larger numbers of people to make fewer and shorter auto trips."

B-10

A new General Plan Policy CE-F.9 addresses the idling of motive equipment.

B-11

The referenced policy (CE-A.6) has been reviewed and revised.

Marilyn Mirrasoul
 June 11, 2007
 Page 6

most energy-efficient water heaters and air conditioning systems that are feasible, and new buildings and major renovations shall use energy efficient lighting (indoor and outdoor) that reduces electricity use by substantially more than current state building code requirements.¹¹

B-12 We also suggest including the City's Climate Action Plan as part of the General Plan. Since that Plan only covers GHG reductions through 2010, the City may be planning to prepare an updated Climate Action Plan that would identify actions to further reduce GHG emissions from City operations after 2010, and implement programs for education and support for GHG reductions by private parties. The updated plan could be adopted as a General Plan amendment.

The City Should Adopt the Two Environmentally Superior Alternatives That Would Reduce the GHG Emissions.

B-13 We urge the City to adopt the two "environmentally superior" alternatives to the proposed General Plan identified in the DEIR. These appear to be feasible alternatives that under CEQA constitute actions that will substantially lessen the project's environmental impacts.

B-14 The Enhanced Sustainability Alternative would modify optional policies in the General Plan that "support" sustainable development, such as energy efficient design, renewable energy, and water conservation,¹² and convert them to enforceable requirements. This Alternative would significantly reduce the project's air pollutant emissions, would also reduce adverse impacts on hydrology and water quality, and would reduce the need for new public utility infrastructure. If the City does not adopt this alternative, many of the mitigation measures that would reduce GHG emissions, including measures that the City itself has identified in the General Plan, would not be enforceable.

B-15 The DEIR also identifies the Increased Parking Management Alternative as environmentally superior. This alternative would expand implementation of permit parking restrictions for certain neighborhoods; increase parking meter fees and extend the hours of operation of meters; and reduce free on-street parking in the City. This alternative would reduce the number of automobile trips, reduce parking demand, and increase the number of trips using carpools, transit, walking or biking. This alternative would reduce the impacts on traffic and air quality, including reducing GHG emissions.¹³

11. Information about energy efficient lighting is available from many sources, including: www.energy.ca.gov/efficiency/lighting/index.html; www.energy.ca.gov/efficiency/lighting/outdoor_reduction.html and www.newbuildings.org/lighting.htm.

12. Minimizing water consumption in new development is an important mitigation for GHG emissions because 60% of the City's energy use is for pumping water and wastewater.

13. The report Statewide Transit-Oriented Development (TOD) Study, *Factors for Success in California, Special Report, Parking and TOD: Challenges and Opportunities*

B-12
 Policy CE-A.13 has been added. This policy calls for the City to "Regularly monitor and update the City's Climate Protection Action Plan."

B-13
 In response to comments made on the Draft General Plan during the public review period, the City has undertaken actions to reduce the GHG emissions of future development under the General Plan and meet its obligations under CEQA to mitigate the cumulatively significant global warming impacts of the General Plan as explained in detail in the response to comment B-1. By adding these comprehensive policies into the General Plan and MMRP and identifying Action Plan measures to implement these policies, the City has incorporated the principal environmentally objectives of the environmentally superior Enhanced Sustainability Alternative into the General Plan. Furthermore, the addition of Policy ME-G.5 to the Mobility Element to "implement parking strategies that are designed to help reduce the number and length of automobile trips ..." incorporates one of the principal environmental objectives related to the Increased Parking Management Alternative into the Draft General Plan. Please also refer to the responses to comments B-15 and B-16.

B-14
 See response to B-13.

B-15
 A new Policy ME-G.5 has been added to the Mobility Element to "implement parking strategies that are designed to help reduce the number and length of automobile trips ..." The addition of this policy incorporates one of the principal environmental objectives related to the Increased Parking Management Alternative into the Draft General Plan.

Marilyn Mirasoul
 June 11, 2007
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B-16

Under CEQA, "feasible" means: "capable of being accomplished in a successful manner within a reasonable period of time, taking into account economic, social and technological factors." Pub. Resources Code § 21061.1. The impacts of global warming are potentially catastrophic and we cannot proceed with "business as usual" even though some of the required changes may encounter public opposition. The City must carefully consider the evidence before determining whether an alternative, or a particular element of the alternative, is feasible or not. Although a measure may be unpopular with some members of the public, if the measure can be included without substantial hardship, it should be considered feasible.

Thank you for your consideration of these comments. We would appreciate the opportunity to meet with City staff to discuss these comments further in an effort to work cooperatively on these issues.

Sincerely,

SANDRA GOLDBERG
 Deputy Attorney General

For EDMUND G. BROWN JR.
 Attorney General

cc: Shirley R. Edwards
 Chief Deputy City Attorney

(February 2002, Business, Transportation and Housing Agency, California Department of Transportation) discusses various parking management activities that have been implemented to reduce single occupancy vehicle trips. The U.S. DOT also identifies parking pricing/management measures in its report "Multi-Pollutant Emissions Benefits of Transportation Strategies" and concludes: "All of these strategies reduce emissions by reducing the number of vehicle trips taken." (http://www.fhwa.dot.gov/environment/conformity/mpe_benefits/index.htm#toc-Chapter.3). Parking management programs that provide environmental benefits are also discussed in "Parking Management, Strategies, Evaluation and Planning," Todd Litman, Victoria Transport Policy Institute, April 25, 2006. (www.vtpi.org/park_man.pdf)

B-16

Please see response to comment B-2. The City of San Diego's General Plan Update has been guided by the City of Villages (smart growth) strategy. This strategy includes coordinated land use and transportation policies that can help reduce local contributions to GHG emissions over the long term through implementation of development patterns and transportation investments that make it possible for larger numbers of people to make fewer and shorter auto trips. The General Plan also includes a wide range of resource conservation and management policies that promote sustainable development and reduce GHG emissions. Revisions have been made to the Draft General Plan, and a preliminary General Plan Action Plan has been drafted in response to public comments received on the General Plan and Draft EIR. These edits have resulted in the preparation of an environmentally superior project being brought forward to public hearings.

In addition, the City's efforts to reduce GHG emissions are bolstered by existing programs including the City's Sustainable Community Program, the Climate Protection Action Plan, the Environmentally Preferable Purchasing Program, and numerous City Council policies addressing resource conservation and management.

Staff appreciated the input provided by Deputy Attorney General Sandra Goldberg at the meeting of June 27, 2007, which resulted in additional communications and sharing of resources. Please also refer to response B-1.



ARNOLD SCHWARZENEGGER
GOVERNOR

June 12, 2007

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



CYNTHIA BREANT
DIRECTOR

Marilyn Mirasoul
City of San Diego
1222 First Avenue
San Diego, CA 92101-4135

Subject: General Plan Update
SCH#: 2006091032

Dear Marilyn Mirasoul:

The State Clearinghouse submitted the above named Draft EIR to selected state agencies for review. On the enclosed Document Details Report please note that the Clearinghouse has listed the state agencies that reviewed your document. The review period closed on June 11, 2007, 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:

C-1

"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,

Terry Roberts
Director, State Clearinghouse

Enclosures
cc: Resources Agency

1400 10th Street P.O. Box 3044 Sacramento, California 95812-3044
(916) 445-6613 FAX (916) 323-3018 www.opr.ca.gov

C-1 Comment acknowledged. This letter acknowledges compliance with the State Clearinghouse review requirements for draft environmental documents.

**Document Details Report
State Clearinghouse Data Base**

SCH# 2006091032
Project Title General Plan Update
Lead Agency San Diego, City of

Type EIR Draft EIR

Description The City of San Diego General Plan Update is proposed to replace the existing 1979 Progress Guide and General Plan (1979 General Plan). The General Plan sets out a long-range, comprehensive framework for how the city will grow and develop, provide public services, and maintain the qualities that define San Diego over the next 20-30 years. The proposed update has been guided by the City of Villages growth strategy and citywide policy direction contained within the General Plan Strategic Framework Element (adopted by the City Council on October 22, 2002). The Draft General Plan is comprised of an introductory Strategic Framework chapter and nine elements: Land Use and Community Planning; Mobility; Urban Design; Public Facilities, Services and Safety; Economic Prosperity; Recreation; Conservation; Historic Preservation; and Noise. The update to the Housing Element was adopted by the City Council under separate cover on December 5, 2006.

Lead Agency Contact

Name Marilyn Mirasoul
Agency City of San Diego
Phone (619) 446-6380 **Fax**
email
Address 1222 First Avenue
City San Diego **State** CA **Zip** 92101-4135

Project Location

County San Diego
City San Diego
Region

Cross Streets

Parcel No.	Township	Range	Section	Base

Proximity to:

Highways
Airports
Railways
Waterways
Schools
Land Use

Project Issues Aesthetic/Visual; Agricultural Land; Air Quality; Archaeologic-Historic; Coastal Zone; Cumulative Effects; Economics/Jobs; Flood Plain/Flooding; Forest Land/Fire Hazard; Geologic/Seismic; Growth Inducing; Landuse; Minerals; Noise; Public Services; Schools/Universities; Sewer Capacity; Soil Erosion/Compaction/Grading; Solid Waste; Toxic/Hazardous; Traffic/Circulation; Vegetation; Water Quality; Water Supply; Wetland/Riparian; Wildlife; Other Issues

Reviewing Agencies Resources Agency; Department of Conservation; Department of Fish and Game, Region 5; Office of Historic Preservation; Department of Parks and Recreation; Office of Emergency Services; California Highway Patrol; Caltrans, District 11; Department of Housing and Community Development; State Water Resources Control Board, Division of Water Rights; Regional Water Quality Control Board, Region 9; Department of Toxic Substances Control; Native American Heritage Commission; State Lands Commission

Date Received 04/26/2007 **Start of Review** 04/27/2007 **End of Review** 06/11/2007

Note: Blanks in data fields result from insufficient information provided by lead agency.



ARNOLD SCHWARZENEGGER
GOVERNOR

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



CYNTHIA BRYANT
DIRECTOR

Memorandum

Date: May 16, 2007
To: All Reviewing Agencies
From: Scott Morgan, Senior Planner
Re: SCH # 2006091032
General Plan Update

The State Clearinghouse is forwarding the attached material from the Lead Agency regarding some additional information for the above-mentioned document. All other project information remains the same.

cc: Marilyn Mirrasoul
City of San Diego
1222 First Avenue
San Diego, CA 92101-4135

STATE OF CALIFORNIA

April Babin, Governor

NATIVE AMERICAN HERITAGE COMMISSION

915 CAPITOL MALL, ROOM 304
 SACRAMENTO, CALIFORNIA
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 e-mail: ca_nahc@pacbell.net



June 4, 2007

Mr. Marilyn Mirasoul
 CITY OF SAN DIEGO
 1222 First Avenue
 San Diego, CA 92201

Re: SCH#2006091032: CEQA Notice of Completion: Draft Environment Impact Report (EIR) for City of San Diego General Plan Update: San Diego County, California

Dear Ms. Mirasoul:

Thank you for the opportunity to comment on the above-referenced document. The Native American Heritage Commission is the state's Trustee Agency for Native American Cultural Resources. This letter and the accompanying Native American Tribal Consultation List meets the consultation requirements of both California Government Code §65352.3 (SB 18) and California Environmental Quality Act (CEQA) Guidelines §15064.5. The California Environmental Quality Act (CEQA) requires that any project that causes a substantial adverse change in the significance of an historical resource, that includes archaeological resources, is a "significant effect" requiring the preparation of an Environmental Impact Report (EIR) per CEQA guidelines §15064.5(b)(c). In order to comply with this provision, the lead agency is required to assess whether the project will have an adverse impact on these resources within the "area of potential effect (APE)", and if so, to mitigate that effect. To adequately assess the project-related impacts on historical resources, the Commission recommends the following action:

D-1

- V. Contact the appropriate California Historic Resources Information Center (CHRIS). Contact information for the Information Center nearest you is available from the State Office of Historic Preservation (916/653-7278)/ <http://www.chr.ca.gov/1088/files/IC%20Register.pdf>. The record search will determine:
 - If a part of the entire APE has been previously surveyed for cultural resources.
 - If any known cultural resources have already been recorded in or adjacent to the APE.
 - If the probability is low, moderate, or high that cultural resources are located in the APE.
 - If a survey is required to determine whether previously unrecorded cultural resources are present.
- V. If an archaeological inventory survey is required, the final stage is the preparation of a professional report detailing the findings and recommendations of the records search and field survey.
 - The final report containing site forms, site significance, and mitigation measures should be submitted immediately to the planning department. All information regarding site locations, Native American human remains, and associated funerary objects should be in a separate confidential addendum, and not be made available for public disclosure.
 - The final written report should be submitted within 3 months after work has been completed to the appropriate regional archaeological information center.
- V. Contact the Native American Heritage Commission (NAHC) for:
 - A Sacred Lands File (SLF) search of the project area and information on tribal contacts in the project vicinity that may have additional cultural resource information. Please provide this office with the following citation format to assist with the Sacred Lands File search request: USGS 7.5-minute quadrangle citation with name, township, range, and section.
 - The NAHC advises the use of Native American Monitors to ensure proper identification and care given cultural resources that may be discovered. The NAHC recommends that contact be made with Native American contacts on the attached list to get their input on potential project impact (APE). The Commission is concerned that relations between the City of San Diego will improve as they are apparently strained as result of disagreements over the conduct of several projects during calendar year 2006.
- V. Lack of surface evidence of archaeological resources does not preclude their subsurface existence.
 - Lead agencies should include in their mitigation plan provisions for the identification and evaluation of accidentally discovered archeological resources, per California Environmental Quality Act (CEQA) §15064.5 (f). In areas of identified archaeological sensitivity, a certified archaeologist and a culturally affiliated Native American, with knowledge in cultural resources, should monitor all ground-disturbing activities.

D-1 Comment acknowledged. This comment letter contains recommended assessment and mitigation measures necessary for site-specific projects which may impact sensitive Native American resources.

It has always been the City's intent to ensure that as part of the CEQA process, issues associated with important archaeological sites and/or traditional cultural properties are adequately addressed and mitigated for in accordance with state law if avoidance cannot be accomplished. It is anticipated that this intent will be enhanced as part of a cooperative effort between the City of San Diego and the local Native American community, and through the City's use of updated procedures related to archaeological resources.

The City of San Diego has recently developed six steps which are utilized by EAS during the CEQA Initial Study process. These steps are used to establish the baseline methods for identifying, evaluating, and recording historical resources. In addition, the City of San Diego is currently in the process of updating the Historical Resources Guidelines and the DSD CEQA Significance Determination Thresholds to incorporate procedures for evaluating potential impacts to archaeological resources early in the CEQA Initial Study process. Additional information is being incorporated in the Guidelines regarding Native American contact as part of the archaeological background study and CEQA Initial Study process.

The current archaeological MMRPs for public and private projects have also been updated to require Native American monitoring in high sensitivity areas as determined in consultation with qualified City staff. The updated MMRPs include a condition that a preconstruction meeting must include the Native American monitor or work will not be allowed to commence. The City is also working to improve contract specification language for public projects as it relates to compliance with applicable state laws for the treatment of human remains.

- + Lead agencies should include in their mitigation plan provisions for the disposition of recovered **artifacts**, in consultation with culturally affiliated Native Americans.
- V Lead agencies should include provisions for discovery of Native American human remains or unmarked cemeteries in their mitigation plans.
 - * CEQA Guidelines, Section 15064.5(d) requires the lead agency to work with the Native Americans identified by this Commission if the initial Study identifies the presence or likely presence of Native American human remains within the APE. CEQA Guidelines provide for agreements with Native American, identified by the NAHC, to assure the appropriate and dignified treatment of Native American human remains and any associated grave sites.
- V Health and Safety Code §7050.5, Public Resources Code §5097.98 and Sec. §15064.5 (d) of the CEQA Guidelines mandate procedures to be followed in the event of an accidental discovery of any human remains in a location other than a dedicated cemetery.
- V Lead agencies should consider avoidance, as defined in § 15320 of the CEQA Guidelines, when significant cultural resources are discovered during the course of project planning.

Please feel free to contact me at (916) 653-6251 if you have any questions.

Sincerely,

 Dave Singleton
 Program Analyst
 Co. State Clearinghouse

Attachment: List of Native American Contacts

COMMENTS

RESPONSES

Native American Tribal Consultation List
San Diego County
June 4, 2007

Barona Group of the Capitan Grande
Rhonda Welch-Scalco, Chairperson
1095 Barona Road Diegueno
Lakeside , CA 92040
sue@barona-nsn.gov
(619) 443-6612

Sycuan Band of the Kumeyaay Nation
Danny Tucker, Chairperson
5459 Sycuan Road Diegueno/Kumeyaay
El Cajon , CA 92021
ssilva@sycuan-nsn.gov
619 445-2613

Ewitaapaayp Tribal Office
Hartan Pinto, Sr., Chairperson
PO Box 2250 Kumeyaay
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wmicklin@leaningrock.net
(619) 445-6315 - voice

Viejas Band of Mission Indians
Bobby L. Barrett, Chairperson
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(619) 445-3810

La Posta Band of Mission Indians
Gwendolyn Parada, Chairperson
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Campo Kumeyaay Nation
H. Paul Cuero, Jr., Chairperson
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chairgoff@aol.com
(619) 478-9046

Marzanita Band of Kumeyaay Nation
Leroy J. Elliott, Chairperson
PO Box 1302 Kumeyaay
Boulevard , CA 91905
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Jamul Indian Village
Leon Acebedo, Chairperson
P.O. Box 612 Diegueno/Kumeyaay
Jamul # CA 91935
jamulrez@sctdv.net
(619) 669-4785

San Pasqual Band of Mission Indians
Allen E. Lawson, Chairperson
PO Box 365 Diegueno
Valley Center , CA 92082
(760) 749-3200

Mesa Grande Band of Mission Indians
Mark Romero, Chairperson
P.O. Box 270 Diegueno
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This list is current only as of the date of this document.

Distribution of this list does not relieve any person of statutory responsibility as defined in Section 7050.5 of the Health and Safety Code, Section 50973.4 of the Public Resources Code and Section 5097.38 of the Public Resources Code.

This list is applicable only for consultation with Native American tribes under Government Code Section 85382.3.

Native American Tribal Consultation List
San Diego County
June 4, 2007

Kwaaymil Laguna Band of Mission Indians

Carmen Lucas

P.O. Box 775

Pine Valley, CA 91962

(619) 709-4207

Diegueno - Kwaaymil

Kumeyaay Cultural Repatriation Committee

Steve Banegas, Spokesperson

1095 Barona Road

Lakeside, CA 92040

(619) 443-6612

Diegueno/Kumeyaay

Santa Ysabel Band of Diegueno Indians

Devon Reed Lomayevsa, Esq. Tribal Attorney

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Santa Ysabel, CA 92070

driomayevsa@verizon.net

(760) 765-0845

Diegueno

This list is current only as of the date of this document.

Distribution of this list does not relieve any person of statutory responsibility as defined in Section 7066.5 of the Health and Safety Code, Section 5097.94 of the Public Resources Code and Section 5097.98 of the Public Resources Code.

This list is applicable only for consultation with Native American tribes under Government Code Section 65152.1.

State of California - The Resources Agency

ARNOLD SCHWARZENEGGER, Governor

**DEPARTMENT OF FISH AND GAME**

http://www.dfg.ca.gov
South Coast Region
4949 Viewridge Avenue
San Diego, CA 92123
(858) 467-4201



June 18, 2007

Marilyn Mirrasoul
Environmental Planner
City of San Diego
Development Services Department
1222 First Avenue, MS 501
San Diego, California 92101

**Comments on the Draft Program Environmental Impact Report for the City of San Diego
Draft General Plan (Project No. 104495, SCH# 2006091032)**

Dear Ms. Mirrasoul:

The California Department of Fish and Game (Department) has reviewed the above-referenced Draft Program Environmental Impact Report (DPEIR) dated April 26, 2007. At our request, the City of San Diego (City) granted the Department an extension of the comment period for the DPEIR until June 18, 2007 (M. Mirrasoul, email correspondence, June 4, 2007). We appreciate the extension. The comments provided herein are based on information provided in the DPEIR and associated documents, the City's October 2006 Draft General Plan, our knowledge of sensitive and declining vegetation communities in the County of San Diego, and our participation in regional conservation planning efforts.

The Department is a Trustee Agency and a Responsible Agency pursuant to the California Environmental Quality Act (CEQA; Sections 15386 and 15381, respectively) and is responsible for ensuring appropriate conservation of the state's biological resources, including rare, threatened, and endangered plant and animal species, pursuant to the California Endangered Species Act (CESA) and other sections of the Fish and Game Code. The Department also administers the Natural Community Conservation Planning (NCCP) Program. The City of San Diego (City) currently participates in the NCCP program by implementing its approved Multiple Species Conservation Program (MSCP) Subarea Plan.

The proposed project is the adoption and implementation of the Draft General Plan, and companion items, which would guide future growth and development within the City over the next 20-30 years. Due to the limited amount of vacant land available within the City for development, the Draft General Plan emphasizes targeted development and reinvestment in existing communities by combining residential, commercial, and other development in compact, mixed-use village centers connected to a regional transit system. The Draft General Plan is a policy-level document, thus future actions would be required for its implementation, such as: community plan updates,

Ms. Mirasoul
June 18, 2007

Page 2

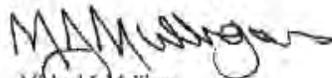
land development code amendments, development projects, and others. Although environmental review of these future actions may tier from the PEIR, separate environmental review pursuant to CEQA would be performed for these actions. Certification of the PEIR and approval of the General Plan does not authorize any physical development.

In general, mitigation for impacts is not available at the PEIR level of review since specific development projects that would occur in the course of implementing the Draft General Plan are not known. All mitigation for specific projects would be in accordance with existing guidelines, including but not limited to the City's Biology Guidelines, ordinances, and the MSCP Subarea Plan. The DPEIR identifies potentially significant and unavoidable environmental impacts from the proposed project in the following areas: agricultural resources, air quality, biological resources, geologic conditions, health and safety, historical resources, hydrology, land use, mineral resources, noise, paleontological resources, population and housing, public services, public utilities, transportation/circulation/parking, visual effects and neighborhood character, and water quality. Four alternatives to the proposed project are analyzed in the DPEIR: 1) No project (represents build-out under currently adopted plans, not a 'no build' scenario); 2) Enhanced sustainability; 3) Increased parking management; and 4) Concentrated growth.

We offer our comments and recommendations in the attached enclosure to assist the City in avoiding, minimizing, and adequately mitigating project-related impacts to biological resources, and to ensure that the project is consistent with ongoing regional habitat conservation planning efforts. In summary, our primary comments address the following: (1) subsequent CEQA review for future actions under the proposed project; (2) the City's MSCP obligations; (3) increased recreation in the MHPA; (4) potential impacts to wildlife movement; (5) development of public facilities; (6) additional thresholds of significance; (7) mitigation measures Bio-1 through Bio-9; (8) the mitigation framework for biological resources; (9) mitigation ratios provided for Tier IIIA habitats; and (10) the need to address highly sensitive species not covered by the MSCP.

We appreciate the opportunity to comment on the DPEIR for this project. If you have questions or comments regarding this letter, please contact Heather Schmalbach of the Department at (858) 637-7188.

Sincerely,



Michael J. Mulligan
Deputy Regional Manager
California Department of Fish and Game

cc: State Clearinghouse

COMMENTS

RESPONSES

Department Comments on the Draft Program Environmental Impact Report for the City of San Diego Draft General Plan

E-1

1. Section 2.1.3 of the DPEIR indicates that the City (as Lead Agency), under Section 15168 of CEQA, may determine that no further environmental review would be required for actions determined to be within the scope of the PEIR for the proposed project. Due to the coarse level of impact analysis feasible at the PEIR level, the Department assumes that all subsequent actions would undergo separate environmental analysis pursuant to CEQA.

E-2

2. The Department requests that the following responsibilities be included under the City's primary MSCP obligations discussed in Section 3.3.3 (page 3.3-23) of the DPEIR: a) preparation and implementation of area-specific management directives (ASMDs) for lands preserved under the MSCP; b) ensure development project compliance with the species specific conditions contained in Table 3-5 of the MSCP Subregional Plan; and c) manage all lands preserved under the MSCP to maintain the long-term viability of natural habitats for covered species, to include implementation of measures to control unauthorized and/or incompatible uses on preserve lands, control of exotic species, and others.

E-3

3. One of the goals of the Recreation Element indicated in the Draft General Plan is to build upon existing recreation facilities and services in order to meet the City's increasing recreational needs as vacant land becomes less available. These needs would be met, in part, through increased public access and utilization of City-owned open space lands included within the Multi-Habitat Planning Area (MHPA). On the other hand, one of the policies of the Conservation Element is to preserve natural habitats pursuant to the MSCP and manage all City-owned native habitats to ensure the long term biological viability of rare plant and animal species.

While passive recreation is an allowed use within the MHPA, per the MSCP Subarea Plan, the Department is concerned about potential degradation of the MSCP Preserve and impacts to covered species as a result of increased recreational use of these areas (e.g., edge effects, increased noise levels, breeding season disruptions, etc.). The final PEIR should include an analysis of potentially significant direct, indirect, and cumulative impacts to the long term viability of sensitive habitats and MSCP covered species from increased levels of use of the MHPA for recreation. In addition, the final PEIR should include possible mitigation measures to avoid, minimize, and/or reduce degradation of the MSCP Preserve from increased recreational use (e.g., seasonal closures, environmentally sensitive trail design, education and outreach, etc.).

E-4

4. The DPEIR indicates that the proposed project would minimize impacts to wildlife movement by focusing on compact development patterns which would reduce habitat fragmentation. However, the DPEIR does not address potential impacts on wildlife movement from development of the proposed regional transit system. The final PEIR should include an analysis of potentially significant impacts to regional and local wildlife corridors from development of a region-wide public transit system.

5. The DPEIR indicates that the proposed project would include the construction of new and enhanced public facilities and remediation of existing infrastructure deficiencies to support

E-1

Any discretionary project with impacts to sensitive resources such as biological and MSCP resources would require subsequent environmental review in accordance with all City regulations and policies including the Environmentally Sensitive Lands (ESL) Regulations of the City's Land Development Code, the MSCP Subarea Plan, the Development Services Department's Significance Determination Thresholds, and Biology Guidelines.

E-2

Language has been added to the PEIR under MSCP obligations to include:

1. Preparation and Implementation of Area Specific Management Directives (ASMDs).
2. Ensure development project compliance with the species specific conditions contained on Table 3-5 of the MSCP Subarea Plan.
3. Management of lands conserved under the MSCP in accordance with the MSCP Subarea Plan and Implementing Agreement (IA).

E-3

Specific projects have not been identified at this time; therefore, any potential significant direct, indirect, or cumulative impacts are unknown and cannot be appropriately analyzed with this document. However, all projects which would impact biological resources or the MHPA would require subsequent environmental review including any proposed trail or recreational use within City-owned lands. The City's Environmental Analysis Section and MSCP staff would review projects for direct, indirect and/or cumulative impacts and for consistency with Section 1.5.2 "Public Access, Trails and Recreation" within the MSCP Subarea Plan, as well as all applicable City regulations and policies. Required mitigation could include, but would not be limited to, environmentally sensitive trail design, trail closures, education, and outreach.

E-4

At the program level, a mitigation framework for future development is proposed. Specific and project level potential impacts to wildlife corridors as a result of the implementation of a region-wide public transit system are unknown, and cannot be appropriately analyzed with this document. However, all projects which would impact biological resources or the MHPA would require subsequent environmental review.

COMMENTS

RESPONSES

Ms. Mirrasoul
June 18, 2007

Enclosure, Page 2

- E-5 increases in population density. Due to the fact that "essential public facilities" are an allowed use within the MHPA (Section 1.4 of the MSCP Subarea Plan), the final PEIR should include an analysis of potential direct, indirect, and cumulative impacts to the long term viability of the MHPA from the possible encroachment of public facilities and infrastructure.
- E-6 6. The Thresholds of Significance used to identify potentially significant environmental impacts that would occur from implementation of the proposed project should be amended in the final PEIR to include those provided in the City's Significance Determination Thresholds Guidelines (January 2007). For example, the following thresholds of significance should be added or incorporated into the Biological Resources impact analysis (Section 3.3.2):
- Results in a substantial adverse impact, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in the MSCP or other local or regional plans, policies or regulations, or by the California Department of Fish and Game (CDFG) or U.S. Fish and Wildlife Service (USFWS)?
 - Results 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 CDFG or USFWS?
 - Interferes substantially with established native resident or migratory wildlife corridors, including linkages identified in the MSCP Plan, or impede the use of native wildlife nursery sites?
 - Results in a conflict with the provisions of an adopted Habitat Conservation Plan, Natural Conservation Community Plan, or other approved local, regional, or state habitat conservation plan, either within the MSCP plan area or in the surrounding region?
 - Introduces land use within an area adjacent to the MHPA that would result in adverse edge effects?
 - Results in an introduction of invasive species of plants into a natural open space area?
- E-7 7. In the impact analysis discussion for biological resources, a reference is made to mitigation measures Bio-1 through Bio-9 (DPEIR page 3.3-22). We were not able to locate these mitigation measures within the document. The final PEIR should include these measures or remove all references to them.
- E-8 8. In the DPEIR, the mitigation framework for biological resources (Section 3.3.4) does not represent and/or include all potential mitigation requirements for biological impacts (e.g., avian breeding season restrictions, impacts to narrow endemic species, etc.). In order to minimize potential inconsistencies with currently applied mitigation requirements, we recommend that the final PEIR either a) remove all text pertaining to current mitigation measures and instead reference the appropriate regulations/ordinances (i.e., Section 1.4.3. of the MSCP Subarea Plan for MHPA Land Use Adjacency Guidelines); or b) emphasize that the mitigation framework does not represent and/or include all the potential mitigation measures which may be required for future development under the Draft General Plan, and does not amend and/or supersede any requirements provided in the MSCP Subarea Plan, Implementing Agreement, Biology Guidelines and/or other accepted City ordinances and

- E-5 No construction is proposed and no specific projects or actions have been identified with the Draft General Plan that would result in any direct or indirect physical change in the environment. See response to comments E-3 and E-4.
- E-6 The referenced text is consistent with the Development Services Department's Significance Determination Thresholds (2007) for Biological Resources. The PEIR has been revised to reflect the correct text..
- E-7 The PEIR has been revised to omit reference to mitigation measures Bio1-Bio-9.
- E-8 As specific projects are submitted, the impacts would be analyzed at the project level; and appropriate mitigation measures in accordance with the ESL regulations, MSCP Subarea Plan, and the City's Biology Guidelines would be required. As discussed in the first paragraph describing mitigation measures under the 3.3.4 Mitigation Framework heading, "These measures may be updated periodically in response to changes in federal and state laws, and new/improved scientific methods."

COMMENTS

RESPONSES

Ms. Mirasoul
June 18, 2007

Enclosure, Page 3

regulations for impacts to biological resources.

- E-9** 9. The mitigation ratios provided for Tier IIIA (common uplands) in Table 3.3-4 of the DPEIR (Upland Mitigation Ratios, page 3.3-28) are higher than those cited in the City's Biology Guidelines. The final PEIR should correct this inconsistency.
- E-10** 10. The final PEIR should address specific impacts and mitigation requirements for highly sensitive species and/or habitats that are not covered by the MSCP Subarea Plan and Implementing Agreement (e.g., Quino Checkerspot). In some cases, additional mitigation measures may be required for impacts to these species.

E-9 The PEIR (Table 3.3-4) has been revised to be consistent with City's Biology Guidelines, Upland Mitigation Ratios.

E-10 For projects impacting sensitive biological resources, a project specific Biological Technical Report would be prepared which would address highly sensitive species and/or habitats not covered by the MSCP. In accordance with the City Biology Guidelines Section II "Development Regulations" additional mitigation may be required. Impacts to species not covered by the MSCP (e.g., Quino Checkerspot Butterfly) may also require state and federal permitting. Prior to the issuance of any grading permits, the applicant would be required to demonstrate that all applicable state and federal permits have been obtained. See response to comment E-8.

COMMENTS

RESPONSES

STATE OF CALIFORNIA

ARNOLD SCHWARZENEGGER, Governor

PUBLIC UTILITIES COMMISSION

120 WEST 4TH STREET, SUITE 500
LOS ANGELES, CA 90013



June 7, 2007

Marilyn Mirrasoul
City of San Diego
1222 First Avenue, MS 501
San Diego, CA 92101-4155

Dear Ms. Mirrasoul:

Re: SCH# 2006091032; San Diego General Plan Update

The California Public Utilities Commission (Commission) has jurisdiction over the safety of highway-rail crossings (crossings) in California. The California Public Utilities Code requires Commission approval for the construction or alteration of crossings and grants the Commission exclusive power on the design, alteration, and closure of crossings.

The Commission's Rail Crossings Engineering Section (RCES) is in receipt of the *Notice of Completion & Environmental Document Transmittal-DEIR* from the State Clearinghouse. RCES recommends that the City add language to the General Plan so that any future planned development adjacent to or near the various railroad right-of-way be planned with the safety of the rail corridor in mind. New developments may increase traffic volumes not only on streets and at intersections, but also at at-grade highway-rail crossings. This includes considering pedestrian circulation patterns/destinations with respect to railroad right-of-way.

F-1

Safety factors to consider include, but are not limited to, the planning for grade separations for major thoroughfares, improvements to existing at-grade highway-rail crossings due to increase in traffic volumes and appropriate fencing to limit the access of trespassers onto the railroad right-of-way.

The above-mentioned safety improvements should be considered when approval is sought for the new developments. Working with Commission staff early in the conceptual design phase will help improve the safety to motorists and pedestrians. Please advise us on the status of the project. If you have any questions in this matter, please contact me at (213) 576-7078 or at rxm@cpuc.ca.gov.

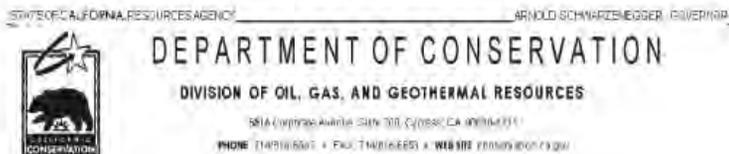
Sincerely,

Rosa Muñoz, PE
Utilities Engineer
Rail Crossings Engineering Section
Consumer Protection & Safety Division

C: Keith Kranda, NCTD
John Shurson, BNSF
Nancy Dock, SDTI

F-1 Comment noted. This comment does not address the adequacy of the PEIR. However, an edit to the General Plan is proposed as follows: ME-B.9f Address rail corridor safety in the design of development adjacent to or near railroad rights-of-way.

The traffic safety and impacts of pedestrians and vehicles at rail crossings are studied at all crossings that are impacted by new development projects or by future roadway modifications within the City of San Diego. If a development project significantly impacts a railroad crossing, mitigation measures would be required.



May 24, 2007

Ms. Marilyn Mirrasoul, Environmental Planner
 City of San Diego Development Services Center
 1222 First Avenue, MS 501
 San Diego, California 92101

Subject: Draft Environmental Impact Report for the City of San Diego General Plan Update,
 SCH# 2006091032

Dear Ms. Mirrasoul,

The Department of Conservation's (Department) Division of Oil, Gas, and Geothermal Resources (Division) has reviewed the above referenced project. The Division supervises the drilling, maintenance, and plugging and abandonment of oil, gas, and geothermal wells in California.

The proposed project is located outside of the administrative boundaries of any oil and gas field. However, there are thirty-five idle and twenty-three plugged and abandoned wells within San Diego County. The wells are identified on Division map W1-7 and in Division records at the Cypress office. The Division recommends that all wells within or in close proximity to project boundaries be accurately plotted on future project maps.

G-1

Building over or in the proximity of idle or plugged and abandoned wells should be avoided if at all possible. If this is not possible, it may be necessary to plug or re-plug wells to current Division specifications. Also, the State Oil and Gas Supervisor is authorized to order the reabandonment of previously plugged and abandoned wells when construction over or in the proximity of wells could result in a hazard (Section 3208.1 of the Public Resources Code). If abandonment or reabandonment is necessary, the cost of operations is the responsibility of the owner of the property upon which the structure will be located. Finally, if construction over an abandoned well is unavoidable an adequate gas venting system should be placed over the well.

Furthermore, if any plugged and abandoned or unrecorded wells are damaged or uncovered during excavation or grading, remedial plugging operations may be required. If such damage or discovery occurs, the Division's district office must be contacted to obtain information on the requirements for and approval to perform remedial operations.

The Department of Conservation's mission is to protect California's environment by protecting trees and property from wildfires and landslides; ensuring safe mining and oil and gas drilling; conserving California's fossil fuels; saving energy and resources through recycling.

G-1 The City has obtained the geospatial data for the well locations from the California Department of Conservation and has used the data to create a map showing well locations in the General Plan project area, as shown on PEIR Figure 3.5-1. The City has addressed the idle wells and abandoned and plugged wells in the PEIR section 3.5.1, Existing Conditions, by including the following discussion:

According to the State Department of Conservation's Division of Oil, Gas, and Geothermal Resources (DOGGR) database, 21 idle wells and 12 plugged and abandoned oil or gas wells have been identified with the Draft General Plan planning area as shown in Figure 3.5-1. The DOGGR also maintains a list and maps oil and gas wells on their website. The state defines an idle well as a well that has not produced oil and/or gas or has not been used for fluid injection for six consecutive months during the last five years. Plugged and abandoned wells are wells that have ceased oil or gas production and have been sealed with a concert plug.

The City has addressed the idle wells and abandoned and plugged wells in the PEIR section 3.5.3, Impact Analysis, by including the following discussion:

Development pursuant to implementation of the Draft General Plan could occur on sites with idle, plugged, and abandoned wells. In accordance with state requirements, any new development on sites idle, plugged and abandoned wells will necessitate the clean up and/or remediation of the property in accordance with applicable state requirements and regulations. This may require that the wells be plug or re-plug wells to current state specifications. The state can order the reabandonment of previously plugged and abandoned wells when construction over or in the proximity of wells could result in a hazard (Section 3208.1 of the Public Resources Code). If abandonment or reabandonment is necessary, the cost of operations is the responsibility of the owner of the property upon which the development will be located. If development over an abandoned well is unavoidable, an adequate gas venting system

COMMENTS

Ms. Marilyn Mirrasoul, Environmental Planner, City of San Diego

May 24, 2007

Page 2

G-2

To ensure proper review of building projects, the Division has published an informational packet entitled, "Construction Project Site Review and Well Abandonment Procedure" that outlines the information a project developer must submit to the Division for review. Developers should contact the Division Cypress district office for a copy of the site-review packet. The local planning department should verify that final building plans have undergone Division review prior to the start of construction.

Thank you for the opportunity to comment on the draft Environmental Impact Report for the General Plan Update. If you have questions on our comments, or require technical assistance or information, please call me at the Cypress district office: 5818 Corporate Avenue, Suite 200, Cypress, CA 90630-4731; phone (714) 818-8847.

Sincerely,



Paul Frost
Associate Oil & Gas Engineer

RESPONSES

should be placed over the well. If any plugged and abandoned or unrecorded wells are damaged or uncovered during excavation or grading, remedial plugging operations may be required. If such damage or discovery occurs, the state Department of Conservation, Division of Oil, Gas, and Geothermal Resources (DOGGR) must be contacted to obtain information on the requirements for and approval to perform remedial operations.

G-2

To ensure proper review of development projects, DOGGR has published an informational packet entitled, "Construction Project Site Review and Well Abandonment Procedure" that outlines the information a development applicant must submit to the DOGGR for the review of projects on sites or in close proximity to sites containing plugged and abandoned wells. No construction will be permitted to occur at such locations until the City can verify that DOGGR has reviewed and cleared the development project. Based on continued oversight by the DOGGR for development on sites or in the proximity of sites with plugged and abandoned wells, no significant impacts are anticipated with this issue.



June 11, 2007

Marilyn Mirrasoul
Environmental Planner
City of San Diego Development Services Center
1222 First Avenue, MS 501
San Diego, CA 92101

**RE: COMMENTS ON THE DRAFT PROGRAM ENVIRONMENTAL IMPACT REPORT
FOR THE CITY OF SAN DIEGO DRAFT GENERAL PLAN**

Dear Ms. Mirrasoul,

The County of San Diego has received and reviewed the Draft Program Environmental Impact Report (PEIR) for the City of San Diego General Plan Update SCH #2006091032 dated April 26, 2007 and appreciates this opportunity to comment. In response to the Draft PEIR, the County has identified environmental issues that may have a significant affect on the unincorporated lands of San Diego County.

The County is the land use authority for the unincorporated area of San Diego County and our public constituent looks to us to guide reasonable and environmentally sensitive development in our jurisdiction. Staff from the Department of Planning and Land Use (DPLU), Department of Parks and Recreation (DPR), the Department of Public Works (DPW), and Department of General Services (DGS) have reviewed the Draft PEIR and have the following comments regarding the content of the above referenced document:

HOUSING

1. **H-1** Regarding the prospective annexation of Davis Ranch, the 77-acre property located adjacent to Interstate 15, the Draft PEIR on page 3.8-12 states that this land is designated for Industrial use, however the current County General Plan Designation is for Public/Semi Public Facilities and the Zoning is A70, Limited Agriculture. The planned land uses for this site under the proposed GP2020 is for Office Professional along the western portion of the site and Village Residential (VR-20) along the eastern portion of the site. Build out of the VR-20 designated areas of this site is planned to be included in the County's Housing Element to count towards the County's Regional Housing Needs Allocation. If the City were to go forward with an annexation of this property, the City would need to take on the affordable unit housing allocation, thus reducing the required affordable housing units that would need to be provided by the County. Legislation is pending to require this (AB 1019).

PROSPECTIVE ANNEXATION AREAS

2. **H-2** Figure 2.2-1 of the Draft PEIR identifies prospective annexation areas including two County islands and two large unincorporated areas of the unincorporated County: 4S Ranch and East Otay Mesa (EOM). It is unclear why annexation of 4S Ranch is being pursued. 4S Ranch was previously within the City of San Diego's Sphere of Influence (SOI) until the owners/developers of 4S Ranch went through the LAFCO procedure to remove the land from the sphere. 4S Ranch was developed through an extensive County planning process, is primarily built out, and services are already provided in this area. For these reasons, the County does not support the prospective annexation of 4S Ranch to the City of San Diego.

H-3 Similarly, annexation of EOM would extend the City's jurisdictional boundary and SOI further east outside of the City's current SOI. The County is currently in the process of updating the EOM Specific Plan. As part of that update, the County has identified necessary improvements to essential public services including roads, sewers, water, fire, and sheriff. These services would be provided in timing with future development, either through project conditions or special districts. Therefore, City annexation of EOM is not necessary to provide urban level services, nor does the annexation appear to promote the logical expansion of City boundaries. For these reasons, annexation of EOM is not supported by the County.

The County looks forward to working with the City and LAFCO to ensure all proposed annexations of unincorporated County land to the City of San Diego occurs in logical and orderly way to ensure effective land use planning and efficient provision of services.

H-1 Comment acknowledged. Should the City move forward with a proposal for annexation, under AB1019 the City of San Diego and the county of San Diego would be authorized to reach a mutually acceptable agreement on a revised determination of regional housing needs to reallocate a portion of the affected county's share of regional housing needs to the City, and report the revision to the council of governments.

H-2-H-3 4S Ranch and East Otay Mesa (EOM) are identified as prospective annexations areas since they would create logical and contiguous extensions of the City given their relative location and reliance on City infrastructure for access to nearby freeways and facilities, and would provide for opportunities for cost-efficient delivery of urban services. The City does not have specific plans to annex these areas at this time. However, property owners within these areas have the ability to initiate such a process. Should the City pursue annexation of these areas, the annexation process and amendment of the City's Sphere of Influence (SOI) would be done in accordance with LAFCO procedures and State law.

COMMENTS

RESPONSES

City of San Diego General Plan Update
Draft PEIR

-3-

June 11, 2007

PUBLIC UTILITIES

3. Section 3.4, page 3.14-5 references the Integrated Waste Management Plan, Countywide Siting Element, December 2004. The County's Siting Element was approved in 2005 and is available online at <http://www.sdcdpw.org/siting/>. Also, the document was also not referenced in the list of references at the end of the section.

H-4

LAND USE

4. It is a County priority to maintain the recreational values of the Los Penasquitos Canyon Preserve, San Dieguito River Park, Otay Valley Regional Park, Tijuana River Valley Regional Park, Sycamore Canyon Preserve, Goodan Ranch Open Space Preserve, and Lusardi Creek Open Space Preserve. Please include a discussion of County Parks and Preserves and identify where the GPU would result in growth proximal to these Parks and Preserves. The Draft PEIR should identify that significant project level impacts could occur to County parks and preserves, and should identify feasible mitigation measures that would be available for individual projects to mitigate potential impacts to County parks/preserves.

H-5

5. The County recommends that the Mitigation Framework in Land Use Section 3.8.4 include additional information to recognize that projects located adjacent to County MSCP lands and County Parks and Preserves will require coordination with the County of San Diego to ensure that adverse impacts to these resources do not occur. For example, planned development adjacent to preserved lands in the existing South County of San Diego Multiple Species Conservation Program (MSCP) Subarea should follow the guidelines outlined in Section 1.10 (Land Uses Adjacent to the Preserve) of the adopted South County MSCP Subarea Plan (October 22, 1997) to avoid impacts to Parks and Preserves. In addition, planned development adjacent to proposed Pre-approved Mitigation Areas (PAMA) in the draft North County MSCP Plan area should also follow similar adjacency guidelines as those outlined in the South County MSCP Subarea Plan until the draft North County MSCP is approved.

H-6

6. The County recommends that the Land Use Section 3.8.3, Impact Analysis includes a discussion in regards to the City trail system connecting to the established County trail system. Please reference the County's Trail Program (CTP) and the County's Community Trails Master Plan (CTMP) to identify and address linkages to the existing or proposed multi-use County trail easements and pathways. The mitigation framework section should recognize that future projects with connectivity to existing or proposed County trails or pathways would need to be evaluated and designed to ensure adverse impacts related to the trails or pathways do not occur.

H-7

H-4 The adoption date will be corrected and the Countywide Siting Element will be cited under Notes and References of Section 3.14 Public Utilities.

H-5 The last paragraph of the Recreation Element Section E discussion section will be revised to read: "The City of San Diego, in association with other agencies and jurisdictions, currently has four river parks....." In addition, Policy RE-C.6d was edited to include coordination with the County's trail system.

The PEIR Mitigation Framework within the Land Use Section has been revised to recognize that projects located adjacent to County MSCP lands and County Parks and Preserves would require coordination with the County of San Diego to ensure that adverse impacts to these resources does not occur.

H-6 See response to comment H-5.

H.7 The County Trails Master Plan and Program are referenced in the Land Use Section 3.8.1 under Regulatory Framework. The Land Use Section 3.8.3 of the EIR has been edited to include within the mitigation framework a requirement for the county of San Diego to ensure adverse impacts do not occur adjacent to or within county parks and open space. Improving linkages and connectivity is a major theme in the General Plan for both the urban environment and natural environment. The Conservation Element, Section B, Open Space and Landform Preservation (specifically Policy CE-B.1g) and the Recreation Element, Section C, Accessibility, and Section E, Open Space Lands and Resource-Based Parks, (specifically Policies RE-C.6 and a new Policy RE-E.7) reference open space and park trails. Edits to Policy RE-C.6 have been made to include mention of the county trail systems.

7. The Economic Prosperity Element identifies areas planned for the Prime Industrial Lands Overlay (Figure EP-1). The County opposes extension of the prime Industrial Lands Overlay north of Balboa Avenue. The County is opposed to the designation of the Prime Industrial Lands overlay on property located within a minimum of 1000 feet from the entire 19.5-acre County Operations Center Annex (COC Annex) site. The The Polinsky Center, a 9-acre children's residential intake facility, is an existing land use at the COC Annex and there is a possibility of future residential development on the COC Annex site. Based on existing and potential future residential uses at the COC annex site, the designation of the Prime Industrial Lands overlay near the COC annex would create planning conflicts and confusion and would be potentially detrimental to the County's future use of this property. For this reason, the County opposes extension of the prime Industrial Lands Overlay north of Balboa Avenue.

H-8

The County of San Diego has solicited proposals from developers interested in redeveloping both the County-owned COC Annex property located at 5201 Ruffin Road, San Diego CA 92123 and the County Operations Center (COC) located at 5555 Overland Avenue, San Diego 92123. A developer, Lowe Enterprises, has been selected and approved by the Board of Supervisors. The first phase of the project, involving the redevelopment of the 35-acre COC, is moving forward at the present time with the next steps in the implementation process scheduled to occur in July, 2007. Preliminary concept plans for the redevelopment of the COC site include the construction of County offices (including the relocation of certain departments to the site as well as parking structures to accommodate the employees currently working at this major County facility.

H-9

A second phase includes a future development concept for the COC Annex site that emphasizes potential residential development. This type of development is needed in the Kearny Mesa area to support a balance of employment and housing opportunities. Until very recently, housing was nearly unavailable in the Kearny Mesa Community Planning area, except for in nearby Serra Mesa. The effort to develop housing by the County would include an application to the City of San Diego for an amendment to the Kearny Mesa Community Plan to revise the zoning from IL-2 with allowable institutional uses to a zone that is appropriate for mixed use development including residential.

TRAFFIC AND TRANSPORTATION

8. The Draft PEIR is a program-level document that does not provide specific mitigation measures to reduce and/or eliminate the project's significant traffic impacts. Subsequently, significant unavoidable impacts related to transportation, traffic, and circulation remain. The City is encouraged to coordinate with the

H-10

H-8 – H-9 These comments do not specifically address the adequacy of the Draft PEIR, but will be included in the record of public comment for the General Plan.

H-10 - H-16 The City agrees that when analyzing traffic impacts, boundaries should not occur between local jurisdictions. Traffic impacts are analyzed to a point of significance regardless of the jurisdiction in which the impacts occur. The City will continue to coordinate with the county if development impacts occur on the county roadway system and as roadway, bikeway, and transit routes are modified in adjacent areas to the county.

City of San Diego General Plan Update
Draft PEIR

-5-

June 11, 2007

County to address significant project-specific traffic impacts either as part of the General Plan update or individual development projects that result in impacts to the County's roadway network.

9. **H-11** Coordination with County staff is recommended as each portion of the General Plan update is developed to ensure continuity and consistency between the City and County General Plans. Specifically, coordination with County staff is recommended to ensure consistency in the classification/design of Circulation Element roads, bicycle network corridors, and transit routes that traverse both jurisdictions.
10. **H-12** Future projects approved under the City's General Plan may have potentially significant traffic impacts to County roads. The Draft PEIR should recognize the potential traffic impacts to County roads and recognize that impacts would be mitigated through the identification of project specific mitigation identified through site specific traffic analysis. To ensure that potential impacts to County roads are identified for future City projects, it is recommended that the City coordinate with the County and require the following analysis in project level traffic studies for projects that could affect County roads:
- H-13** ➤ Identify the differences in projected LOS on County's Circulation Element roadway facilities as a result of the project. The LOS assessment of County roadway facilities should be based on the County's Public Road Standards criteria.
 - H-14** ➤ The County's Guidelines for Determining Significance for Traffic and Transportation should be used as a guide in the preparation of the traffic analysis (<http://www.sdcounty.ca.gov/dplu/Resources/3-prosguid/3-prosguid.html#trans>) for impacts to County roads. If an alternate method is used, it must be in conformance with the requirements of CEQA (see section 15130 of the State CEQA Guidelines).
 - H-15** ➤ CMP/SANTEC guidelines state that the project study area should extend to include road segments and intersections that receive 50 or more peak hour trips from the proposed project. County guidelines further recommend extending the scope of analysis to 25 peak hour trips for roadways currently operating at LOS E/F.
 - H-16** ➤ Any proposed changes to the City's Circulation Element Plan (deletions, reclassifications, and alignment) should be identified and the analysis should identify if circulation changes would impact the County's Circulation Element roadway network. Several existing and planned roads traverse both the City and County's jurisdiction.

City of San Diego General Plan Update
Draft PEIR

-6-

June 11, 2007

The County of San Diego appreciates the opportunity to continue to participate in the environmental review process for this project. We look forward to receiving and future environmental documents related to this project or providing additional assistance at your request. If you have any questions regarding these comments, please contact Jennifer Campos at (858) 495-5204.

Sincerely,

Handwritten signature of Eric Gibson in cursive, with the word "chief" written in a smaller font below the signature.

ERIC GIBSON, Interim Director
Department of Planning and Land Use

cc: Vince Nicoletti, CAO Staff Officer, DCAO, M.S. 6
Michael Ott, Executive Officer, LAFCO, M.S. A216
John Kross, Deputy Director, General Services, M.S. 0200
Trish Boaz, Chief, County Department of Parks and Recreation, MS 029
Eric Brennecke, Project Manager, Department of Public Works, MS 0336
Priscilla Jaszkwski, Administrative Secretary, Department of Planning and
Land Use, M.S. 0650



SAN DIEGO COUNTY OFFICE OF EDUCATION

6401 LINDA VISTA ROAD, SAN DIEGO, CALIFORNIA 92111-7399 (858) 292-3500

Superintendent of Schools
 Randolph E. Ward, Ed.D.

May 10, 2007

Marilyn Mirasoul
 Environmental Planner
 City of San Diego Development Services Center
 1222 First Avenue, MS 501
 San Diego, CA 92101

Dear Ms. Mirasoul:

Subject: City of San Diego Draft General Plan
 Project No. 104495, SCH No. 2006091032

The San Diego County Office of Education (SDCOE) is in receipt of the draft Program Environmental Impact Report (PEIR) for The City of San Diego Draft General Plan. This letter constitutes our response to the notice.

I-1 The SDCOE provides a variety of school and educational services to City and County residents. Unlike local school districts, the SDCOE provides its services throughout the County, making it the equivalent of a countywide school district. As a result, the SDCOE is affected by growth and development wherever they occur in the City and County.

Some SDCOE programs provide direct services to students, including children (infants, pre-school, and students in grades K-12) as well as adults. Other SDCOE services are provided through public schools, including all forty-three school districts and all five community college districts in the City and County. These services include staff development for teachers and current and prospective administrators, as well as numerous management support services. The following SDCOE programs may be affected by the General Plan:

- Juvenile Court & Community Schools
- Regional Occupation Program
- Hope Infant Handicapped Program
- Migrant Education Program
- Outdoor Education Program
- Teacher Training and Development
- Administration Training and Development
- SDCOE Administration

As stated in the Impact Analysis of Section 3.13 (Public Services and Facilities) of the draft PEIR, "The construction of additional housing units and the increase in population . . . over time will impact various public services and facilities." . . . schools . . . may also experience deficiencies." The PEIR further acknowledges existing infrastructure deficiencies to be remedied, and new or expanded facilities being required to maintain adequate service levels.

Board of Education

Nick Aguilari Susan Hartley Sharon C. Jones Robert J. Watkins John Witt

SERVICE AND LEADERSHIP

I-1: Comment acknowledged. The City of San Diego endeavors to coordinate with adjacent jurisdictions and provides project environmental documents to educational facilities which may be impacted by proposed development. The General Plan includes multiple policies that address the importance of educational facilities and services in the City of San Diego including Policy LU-H.1c which calls for the City to "Recognize the important role that schools play in neighborhood life and look for opportunities to form closer partnerships among local schools, residents, neighborhood groups, and the City with the goal of improving public education."

Letter to Marilyn Imanou
Re: Subject: City of San Diego Draft General Plan / Project No. 104405, SCH No. 2006091032
May 10, 2007
Page 2

We look forward to working with the City to reduce or fully mitigate impacts to SDCOE and school facilities and services in creative and mutually beneficial ways when possible. If you have any questions regarding this correspondence, please feel free to contact me at (858) 292-3680.

Sincerely,



Robert W. Nicholson
Senior Director
School Facilities Planning Services

BN:DRP

cc: Bryan Ehm, Facilities Planning Coordinator
Dana Perrin, Program Business Specialist

CITY OF POWAY



MICKY CARAGNA, Mayor
 MEKRILEE BOYACK, Deputy Mayor
 BOB EMERY, Councilmember
 DON HIGGINSOON, Councilmember
 BETTY KEXFORD, Councilmember

June 8, 2007

Marilyn Mirrasoul
 Environmental Planner
 City of San Diego Development Services Center
 1222 First Avenue, MS 501
 San Diego, CA 92101

Subject: Notice of Preparation of a Draft Program Environmental Impact Report (PEIR) for the City of San Diego Draft General Plan

Dear Ms. Mirrasoul:

Thank you for the opportunity to review the Draft PEIR for the City of San Diego's Draft General Plan. The City of Poway Development Services Department has reviewed it and offers the following comments for your consideration:

- **Page 3.15-5, Level of Service:** 1) Reference should be to Figure 3.15-4 not 3.15-1 in the last paragraph; 2) The City should consider other methodologies to determine LOS other than the V/C ratio methodology for some special segments in the City of San Diego; 3) Figure 3.15-4 shows mostly LOS on State Highways, can major/prime local roadways be included?
- **General Comment:** It would be very helpful for other cities to see the connectivity of the proposed City of San Diego vehicular, bike, and trails circulation systems with the adjoining agency systems. This was done for the transit on page 3.15-3 and the LOS for State Highways on page 3.15-5.

Again, thank you for the opportunity to review and comment on the Draft PEIR of the General Plan.

Sincerely,

DEVELOPMENT SERVICES DEPARTMENT

Jim Lyon
 Jim Lyon
 Senior Planner

M:\planning\center\7\San Diego CP-EIR.doc

City Hall Located at 13325 Civic Center Drive
 Mailing Address: P.O. Box 789, Poway, California 92074-0789 • (858) 668-4400

- J-1 The General Plan EIR analyzed traffic, as well as other environmental impacts, at a citywide (not the project level) perspective. The Level of Service (LOS) is indicated by roadway miles and vehicle miles traveled citywide. The Level of Service for arterial roadway segments will be analyzed at the Community Plan level and project level as community plan updates, amendments, and projects are submitted for review.
- J-2 The Existing and Proposed Bikeways Map 3.15-1, and the Existing and Planned Circulation Map 3.15.3 were updated to show connections to adjacent jurisdictions. A trails map is not available at this time; however, a trails map will be prepared as part of the development of a citywide trails master plan.



CITY OF SANTEE

MAYOR
Kathy Vogel

CITY COUNCIL
Tom U. Dale
Steve W. Jant
John W. Mann
Hal Ryan

June 13, 2007

CITY MANAGER
Keith Pitt

Ms. Marilyn Mirrasoul
Environmental Planner
City of San Diego
Development Services Center
1222 First Avenue, MS 501
San Diego, CA 92101

SUBJECT: Comments on the Draft Program Environmental Impact Report (PEIR), City of San Diego Draft General Plan (Project No. 104495 / SCH No. 2006091032)

Dear Ms. Mirrasoul:

Thank you for the opportunity to review the Draft Program Environmental Impact Report (PEIR) for the City of San Diego Draft General Plan, dated October 2006. The Draft PEIR was prepared to analyze potential environmental effects of adoption and implementation of the Draft General Plan.

The Strategic Framework Element adopted by the City of San Diego in 2002 was used in the development of the Draft General Plan Elements. The City of Villages strategy is a major component of the Strategic Framework Element and would focus growth into mixed-use activity centers or "villages." The Strategic Framework Element defines a "village" as the mixed-use heart of a community where residential, commercial, employment, and civic uses are all present and integrated. Not only are villages pedestrian friendly centers of the community, they are also linked to the regional transit system.

Implementation of the City of Villages strategy will rely on community plan updates or amendments to include "village" designations. To facilitate this process the Draft General Plan Land Use Element includes a Village Propensity Map, which illustrates areas that already exhibit village characteristics as well as areas that have a propensity to develop as villages. The Village Propensity Map identifies a parcel in the East Elliott Community adjacent to the City of Santee and bounded by Mast Boulevard on the north, West Hills Parkway on the east and SR-52 on the west and south as having "Low Propensity" for developing as a village (depicted as Site A in Exhibit).

COMMENTS

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City of San Diego
Marilyn Mirasoul
DPEIR- City of San Diego
June 13, 2007
Page 2

Although it is understood that the Village Propensity Map is an illustrative tool and not a land use map, as part of the General Plan, this Map will provide the framework and policy direction for future community plan updates. For reasons stated in this letter the City of Santee concurs that there is a low propensity for a village at Site A.

K-1 Site A is not designated on the SANDAG Regional Comprehensive Plan (RCP) Smart Growth Concept Map. It is unclear how this site would meet any of the criteria for a village under the Strategic Framework Element. Given that it is located on the western edge of the City of Santee, the site is bounded by the SR-52 and Open Space to the south and west, the Sycamore Landfill to the north, and a low density single-family residential subdivision to the east, and is only intermittently served by bus transit, the viability of the site for a "village" development is questionable. Furthermore, City of San Diego public facilities to serve this site are limited.

K-2 However, the City recommends that a portion of the undeveloped site at the northeast corner of Mission Gorge Road and West Hills Parkway be identified as having higher potential for "village" development (depicted as Site "B" in Exhibit 1). Site B is identified on the SANDAG RCP Smart Growth Concept Map as a Potential Community Center. Although the parcel is within the City of San Diego MHPA conservation area, approximately 25 percent of the site located closest to the corner of Mission Gorge Road and West Hills Parkway consists of non-native grasslands and could be developed consistent with existing zoning that permits mixed-use development (Zone CC-1-3).

Thank you for the opportunity to comment on the Draft PEIR. If you have any questions regarding these comments, please contact Rick Brady, Associate Planner, at (619) 258-4100, extension 182.

Respectfully,



Melanie Kush, AICP
City Planner

c. Keith Till, City Manager
Honorable Mayor and City Council
Gary Halbert, Director of Development Services

S:\RB\m\misc\letters\City San Diego General Plan DEIR Response Letter 061207.doc

K-1 & K-2 The comment letter does not address the adequacy of the environmental document; however, the following information has been provided as a courtesy to the commenter.

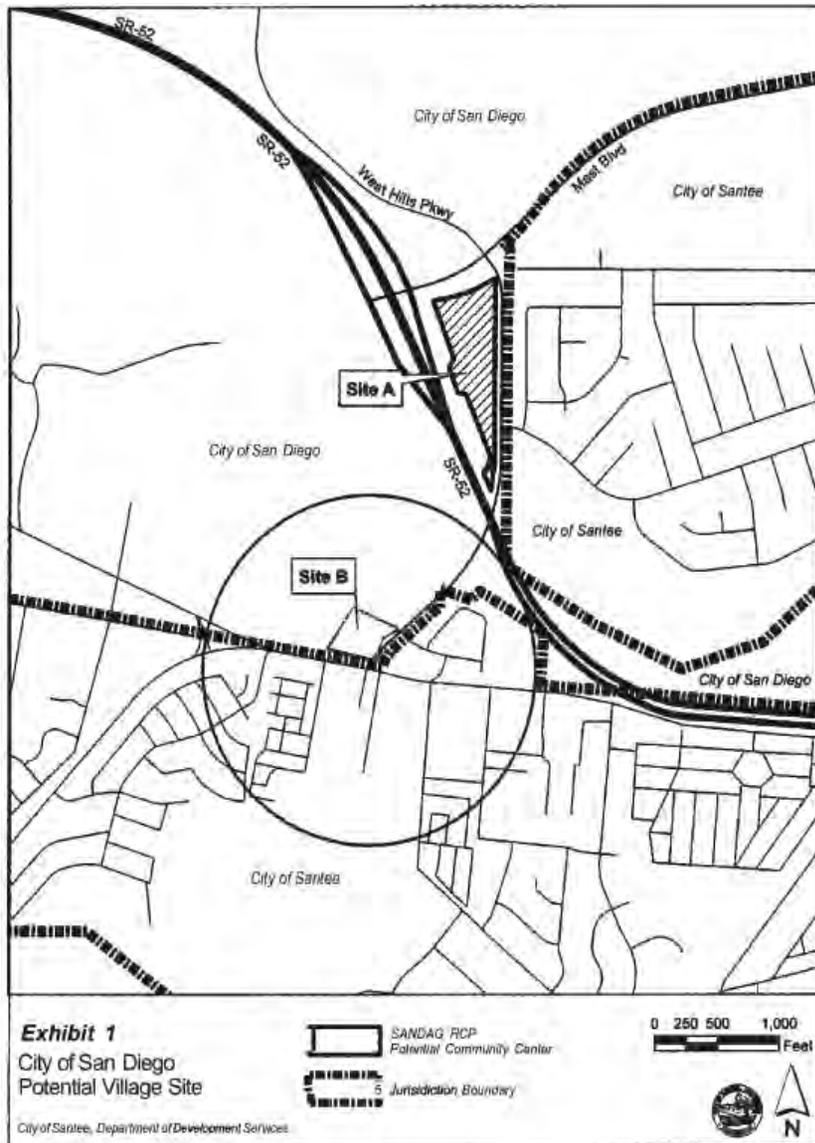
K-1 The Village Propensity Map is an illustrative tool that is intended to show areas throughout the City that contain or have the propensity to develop village areas. The map was developed from a model that the City created to objectively illustrate the propensity for village development. The model is based on the interaction and proximity to different types of land uses and transit services that are supportive of village characteristic. The map is not a prescriptive land use map nor does it provide a policy framework, but rather it is an example of the output of an analytical planning tool that can be further refined to assist in the community plan update process. Actual village locations will be designated in community plans with the input from recognized community planning groups and the public during the community plan update process.

The area that the city of Santee has identified in the East Elliott community plan area as "Site A" is designated for commercial office use. Whereas the area that the city of Santee has identified as "Site B" is designated as open space in the Tierrasanta Community Plan. The Draft General Plan Appendix B explains the methodology and inputs used for the village propensity model. The model uses community plan land use designations rather than zoning designations. Commercial office uses without any adjacent land uses or higher frequency transit service will result in a lower propensity value. The model does not use open space as a land use input.

While the City of San Diego agrees that the commercially designated area in East Elliott has a low propensity for village development, the City wants to avoid subjectively modifying the model methodology. The City, in concept, supports Santee's effort to identify smart growth sites, but the City is not planning to adjust

COMMENTS

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the model methodology to include areas designated for open space. However, as part of the community plan update process, the City will seek input from adjacent cities or the county when community plans that are adjacent to cities or the county are updated or amended.

K-2 See response to comment K-1.



CHULA VISTA ELEMENTARY SCHOOL DISTRICT

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May 30, 2007

SUPERINTENDENT

LOWELL BUELLINGS, Ed.D.

Ms. Marilyn Mirasoul
Environmental Planner
City of San Diego
Development Services Center
1222 First Avenue, MS 501
San Diego, CA 92101

Re: Project No.: 104495, SCH No. 2006091032

Project: Community Plan Area/City Council Districts: All

Dear Ms. Mirasoul:

L-1 Thank you for the opportunity to respond to the Public Notice of a Draft Environmental Impact Report on the project referenced above. The District does not identify any issue and has no comment on the proposed draft of the general plan.

Thank you for keeping us apprised of the projects up for review at the City Planning Department.

Sincerely,

Rafael L. Muñoz
Facilities Planning Manager

RLM:km

L-1: Comment acknowledged. See response to comment I-1.

AIA San Diego

A Chapter of The American Institute of Architects



June 1, 2007

Marilyn Mirasoul, Environmental Planner
 City of San Diego
 Development Services Center
 122 First Avenue, MS 501
 San Diego, CA 92101

Re: Request for Extension of Time for PEIR Review

Dear Ms. Mirasoul:

AIA San Diego respectfully requests a 60-day extension of time for the review of the Program Environmental Impact Report (PEIR) for the final draft of the City of San Diego General Plan.

N-1

The PEIR, which is an extensive analysis of the impacts of the General Plan, was released April 25, 2007. Public comments are due on the PEIR by June 8; however, the draft status report on Land Development Code (LDC) changes won't be seen by the Code Monitoring Team for discussion until June 13. The LDC changes should be reviewed in concert with the PEIR.

A 60-day extension would allow the LDC changes to be considered relative to the PEIR and would allow the PEIR to be sufficiently reviewed as relative to the draft General Plan.

AIA San Diego commends all of the hard work that has gone into these documents, particularly the General Plan as it will establish the land-use vision of San Diego for the next 20 years. It is essential for our city's future that a thorough analysis of the documents are conducted, and AIA San Diego is eager to continue our participation in this analysis.

AIA San Diego recognizes that the PEIR can not identify feasible mitigation to address all future project-level impacts as a result of a specific development project, since it is not analyzing a specific development project; however, we are concerned that the PEIR appears to pass the responsibility for mitigation of significant impacts that are created by the policies of the General Plan onto subsequent action by public or private entities.

Should our request for a 60-day, PEIR-review extension be refused, please note the attachment that outlines our preliminary comments on the PEIR. We would be very

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 619.232.4542 fax
 www.aia.sandiego.com

N-1

Pursuant to Section 128.0307 of the Municipal Code and Section 15105 (c) of the State CEQA Guidelines, the City of San Diego Development Services Department extended the public review period for the environmental document to June 25, 2007. Regarding consideration of the Land Development Code revisions, see response B-1.

pleased to present final comments on PEIR in 60 days and reiterate our request for an extension.

Respectfully,



Paul E. Schroeder, AIA
President

Attachment

Cc: Mayor Jerry Sanders, City of San Diego
Scott Peters, Council President, Councilmember, City of San Diego
Kevin Faulconer, Councilmember, City of San Diego
Toni Atkins, Councilmember, City of San Diego
Tony Young, Councilmember, City of San Diego
Brian Maienschein, Councilmember, City of San Diego
Donna Frye, Councilmember, City of San Diego
Jim Madaffer, Councilmember, City of San Diego
Ben Hueso, Councilmember, City of San Diego

AIA San Diego
 A Chapter of the American Institute of Architects

Attachment

**AIA San Diego
 Preliminary Comments**

Program Environmental Impact Report (PEIR)

AIA Comment 1:

Health and Safety (Section 3.5) (page 1.0-9)

A. Environmental Impact-

N-2 The PEIR identifies that "the Airport Environs Overlay Zone (AEOZ) covers less area than the boundaries of the airport influence area, which could allow the development of future projects that could pose a potentially significant impact outside of the AEOZ boundaries, but within the airport influence area." The mitigation should be stated to make the two consistent.

B. Mitigation Framework-

N-3 The PEIR identifies mitigation for discretionary projects, but it fails to address the mitigation for non-discretionary projects.

AIASD Comment 2:

Land Use (Section 3.8) (page 1.0-10)

A. Environmental Impact-

N-4 Though the Draft General Plan does not change land uses, the PEIR must endeavor to identify and evaluate specific inconsistencies between community plans, the Zoning Code, existing land uses and City policies. The PEIR statement that "implementation of the Draft General Plan could yield significant impacts to land use" is inadequate. One specific example is the impact on existing allowable uses in industrial areas, which is not identified in the PEIR. There are others examples and it is the responsibility of the PEIR to identify them.

N-5 It must further identify the significant impacts of those inconsistencies. What is the impact on ability to develop new projects or expand existing facilities, which are consistent with the Land Development Code (LDC) and community plans, but are inconsistent with the General Plan?

B. Mitigation Framework-

N-6 It is the responsibility of the PEIR to identify a mitigation or implementation plan for transitioning community plans, the Zoning Code, existing land uses and city policies toward greater consistency with the General Plan. It is inadequate to defer mitigation of inconsistencies to some unknown date of a community plan update or some unspecified private

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 www.aiaandsd.org

N-2 The City has included the following discussion in the PEIR: The City will either amend the AEOZ or adopt a new overlay zone to be consistent with the airport influence area boundaries after the ALUC adopts updated ALUCPs.

The PEIR has been revised to clarify that compliance with the policies, regulations and criteria in the ALUCPs is required of all projects in an Airport Influence Area (AIA) and is not considered to be mitigation. However, it is possible that for certain projects, adherence to the regulations may not adequately protect health and safety, and such projects would require additional measures to avoid or reduce significant health and safety impacts. These additional measures, to be adopted at the project level, would be considered mitigation.

N-3 The CEQA applies to discretionary and not ministerial projects; therefore, no mitigation for ministerial projects can be required. However, the City has included the following discussion in the PEIR Section 3.5.3: The City will determine the consistency of ministerial projects with the adopted ALUCPs within the boundaries of the airport influence areas. In addition, the City will not approve ministerial projects that require FAA notification without FAA determination of "No Hazard to Air Navigation" for the project. See response to comment N-2.

N-4 The Development Services Department's CEQA Significance Determination Thresholds state that "The project should be assessed for consistency with any of the adopted plans and regulations (City of San Diego Municipal Code) which govern the region and the particular site. An inconsistency with a plan is not by itself a significant environmental impact; the inconsistency would have to relate to an environmental impact to be considered significant under CEQA."

In this case, the project is an update to the City of San Diego's General Plan. The California Supreme Court has called the General Plan the "constitution for future development." It is

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expected that in the course of implementing the General Plan there will be associated plan, policy, and code amendments. The General Plan policies need to be evaluated per CEQA, but the potential inconsistency of a particular code or policy with the Draft General Plan, is not by itself a significant environmental issue. For example, the General Plan contains extensive policies on mixed-use, village development. Not all community plans identify village, or village-like sites, so community plan updates/amendments will be needed to address this issue. A community plan that does not currently identify village sites is not inconsistent with the General Plan it simply does not fully implement the General Plan's recommendations.

The General Plan PEIR concludes that conflicts with other adopted plans are considered "significant and unavoidable" not because the General Plan's policies are incompatible with adopted plans, but rather due to the uncertainty related to future plan amendments and project reviews.

The General Plan does not change the land use designation or zoning of specific properties. The General Plan provides a menu of Industrial Land Use designations that are to be applied as a part of community plan updates and amendments.

The General Plan also contains policies that are to be applied through the processing of discretionary permits. The prime industrial lands policies will be used in the processing of discretionary permits and may result in the prohibitions or limitations on the issuance of conditional use permits for certain sensitive receptor uses (see Economic Prosperity Element Section A). For example, the Prime Industrial Lands map and associated policies provide guidance on how to protect prime industrial lands. To further clarify the purpose of prime industrial land identification on a given property, a policy was added, Policy EP A-15, which states that the identification of Prime Industrial Land on any property does not preclude the development of any site pursuant to the development regulations and uses of the existing zone and community plan designation. Restrictions affecting the issuance of

COMMENTS

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conditional use permits do not create community plan inconsistencies, as the primary use of the base zone remains industrial. In fact, the proposed General Plan policies and land use designations are tools to more precisely implement community plan land use designations.

- N-5 If a project is consistent with the community plan land use designation, then by default it is consistent with the General Plan land use designation, since the General Plan land use map is a compilation of the community plan land use maps. To clarify this point, Policy LU-C.1 has been revised to include sub-item “b” as follows: “Rely on community plans for site-specific land use and density/intensity designations and recommendations.” In addition, page 3.8 of the Draft PEIR states “The adopted community plans have been and will remain the authority for land use, density, and site specific recommendations.”
- N-6 An additional policy has been drafted to address policy inconsistencies between a community plan (or a proposed amendment to a community plan) and the General Plan, as follows: “Maintain consistency between community plans and the General Plan, as together they represent the City’s comprehensive plan. In the event of an inconsistency between the General Plan and a community plan, action must be taken to either: 1) amend the community plan, or 2) amend the General Plan in manner that is consistent with the General Plan’s Guiding Principles.” As previously stated, an inconsistency with an adopted plan is not in and of itself a CEQA impact. The inconsistency must relate to a physical environmental impact. Until projects are proposed in the future, it is not possible to determine whether they would result in such impacts, and it is therefore also not possible to identify specific mitigation measures. The Mitigation Framework provides guidance on developing mitigation for future community plan updates and individual development proposals.

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development project. How long does the PEIR anticipate that these significant impacts will exist?

C. Page 3.8-2.9 states, "There may be a situation where a community plan does not implement the General Plan to the maximum extent possible, however, it is anticipated that competing goals can be resolved through discretionary review." What if the project is a ministerial permit?

N-7

AIASD Comment 3:

On page 3.8-27, the PEIR states, "An inconsistency with an adopted plan is not by itself a significant impact. The inconsistency must relate to a physical environmental impact to be considered significant under CEQA."

D. . This is similar to Comment 2. The PEIR must endeavor to identify and evaluate inconsistencies between community plans, the Zoning Code, existing land uses and City policies. The PEIR statement that "implementation of the Draft General Plan could yield significant impacts to land use" is inadequate. One specific example is the impact on existing allowable uses currently allowed in industrial areas, but would be prohibited in the future. This is not identified in the PEIR. There are others examples, and it is the responsibility on the PEIR to identify them.

N-8

2. It must further identify the significant impacts of those inconsistencies. What is the impact on ability to develop new projects or expand existing facilities, which are consistent with the Land Development Code (LDC) or Community Plans, but are inconsistent with the General Plan.

N-9

It is the responsibility of the PEIR to identify a mitigation or implementation plan for transitioning community plans, the Zoning Code, existing land uses and city policies toward greater consistency with the General Plan. Shall the General Plan, Community Plan or the Development Regulations take precedence until such time as consistency is achieved?

N-10

AIA Comment 4:

Economic Prosperity Element-

The PEIR states (page 2-35) "the Element also expands the traditional focus of a general plan to include economic development policies that have a less direct effect on land use." The Chamber of Commerce believes that it is essential that the City of San Diego establishes an Economic Prosperity Policy, but questions the appropriateness of including non-land use policies in the General Plan. With the ever-changing economic environment, the city needs to be in a position to adjust its Economic Prosperity

N-11

N-7 If a project is consistent with the community plan and the Land Development Code (LDC), and is processed through a ministerial permit, then the General Plan is not a part of the review process. If the project is processed through a discretionary permit, the community plan and General Plan will be used by City staff to evaluate the project.

N-8 See response to comment N-4. Note that an inconsistency is a legal determination, and not a physical impact on the environment.

N-9 See response to comment N-5.

N-10 See response to comment N-5. The General Plan does not change the land use designation or zoning of specific properties. The GP provides a menu of Industrial Land Use designations that are to be applied as a part of community plan updates and amendments. While doing the analysis of the potential future effects of implementing the General Plan policies necessarily involves some degree of forecasting, identifying specific examples of what *could* happen as a result of a future community plan update, amendment, or development proposal is too speculative for detailed evaluation at the General Plan level. Additional environmental review will be conducted as specific proposals for community plan amendments and rezones occur.

If a project is consistent with the community plan land use designation, then by default it is consistent with the General Plan land use designation, since the General Plan land use map is a compilation of the community plan land use maps. To clarify this

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Land use designation, since the General Plan land use map is a compilation of the community plan land use maps. To clarify this point, Policy LU-C.1 has been revised to include a sub-item “b” as follows: “Rely on community plans for site-specific land use and density/intensity designations and recommendations.” In addition, page 3.8 of the Draft EIR states “The adopted community plans have been and will remain the authority for land use, density, and site specific recommendations.” Staff is unable to speculate on physical environmental impacts from potential future development projects.

As described on page 2-29 of the PEIR Project Description, the City is currently developing a work program to regularly update all of the community plans over what is anticipated to be a 12-year cycle. Additional information on this work program is available in the project description.

- N-11 The State of California General Plan Guidelines (2003, Governor’s Office of Planning and Research), indicates that state law requires “each city and county to adopt a general plan for the “physical development of the county or city and any land outside its boundaries which bears relation to its planning.” This indicates that General Plans are mainly land use documents; however, the guidelines add that General Plans may serve to identify a community’s land use, circulation, environmental, economic and social goals and policies as they relate to land use and development. It specifically addresses socio-economic issues as follows: “Because a general plan represents the most comprehensive local expression of the general welfare as it relates to land use, recognizing social and economic concerns may be quite appropriate.” Chapter 6 of the General Plan Guidelines provides more detailed information on economic/fiscal development, including education and social programs. The General Plan goals and policies have been developed through extensive public outreach, beginning prior to adoption of the Strategic Framework in 2002. The Economic Prosperity Element’s goals and policies have been determined relevant to the City’s planning area through the public process.

Policy without requiring an amendment to the General Plan. Only the portions of the Economic Prosperity Element of the General Plan pertaining to Land Use should be included.

N-12

2. The PEIR states (page 3.8-34) "The identification of prime industrial land does not affect existing land-use designation or zoning." Yet, in order to achieve consistencies between the general plan, community plan, and existing zoning, existing land uses such as Coleman College, Marie College, credit unions, and multi-tenant offices, which are currently allowed in community plans such as Kearny Mesa and its underlying zoning will all become previously conforming. That is a significant impact that is not addressed in the PEIR.

N-13

The PEIR fails to identify that the proposed boundary of the Prime Industrial Land Map in Kearny Mesa is within the 1,000 foot buffer of existing residential uses which is contradictory to criteria established in Appendix C EP-2 of the General Plan and is a significant impact.

AIA Comment 4

General Plan Implementation -

N-14

A. The PEIR should identify the key components and timing of the Draft General Plan-Action Plan over the next five years. It should also address how significant impacts will be mitigated during the transition period. Does this mean that all community plans and modifications to the Land Development Code will be made within the next five years? Will the General Plan, Community Plan or the Development Regulations take precedence until such time as consistency is achieved?

N-12

The questions asked in this comment do not constitute physical environmental impacts created by the General Plan. These questions are issues that must be addressed in future community plan updates/amendments and rezones. Identifying specific examples of what *could* happen as a result of a future community plan update, amendment, or development proposal is speculative and beyond the scope of this PEIR. Further environmental review will be required for future community plan and zoning actions involving application of new Land Use categories.

N-13

This comment does not address environmental impacts associated with the identification of prime industrial land. The Prime Industrial Land Criteria specified in Appendix C, EP-1, are utilized when evaluating community plan updates or community plan amendments/rezones for a conversion of industrial land uses to institutional, residential, mixed-use, and commercial retail and service uses; or a collocation (the geographic integration of residential uses and other non-industrial uses stated above into industrial uses located on the same premises) as specified in policy EP A-12. The criteria were also evaluated when determining the original proposed boundaries of prime industrial land, in general, all of the areas designated as prime industrial do not have a preponderance of residential uses. Therefore, since the 1000-foot distance separation is not an environmental threshold, it is not a significant environmental impact.

N-14

Comment noted. The General Plan and the associated Action Plan will be monitored to measure achievement of the General Plan goals.

See responses to comments N-5 & N-4.

As described on Page 2-29 of the PEIR Project Description, the City is currently developing a work program to regularly update all of the community plans over what is anticipated to be a 12-year cycle. Additional information on this work program is available in the project description.

**AIA San Diego Comments
Relative to the Program Environmental Impact Review (PEIR)
for the City of San Diego Final Draft General Plan**

- 1. Executive Summary 1.3 Summary of Environmental Impacts and Mitigation Measures** (page 1.0-3): "As such, each of the issue areas identified above describes impacts that may remain significant and unavoidable even with the proposed program level mitigation framework."
N-15 **Comment:** What are the overriding findings to approve the significant unmitigated impacts?
- 2. Enhanced Sustainability** (page 1.0-5):
N-16 **Comment:** AIASD strongly supports the Enhanced Sustainability Section.
- 3. Increased Parking Management** (page 1.0-5):
N-17 **Comment:** AIASD understands that a joint Planning Commission and LU&H workshop on parking is scheduled for August 2007. This section appears to establish direction in a General Plan prior to the workshop. The General Plan needs to be written to allow flexibility as different methods of parking management tools are tried, tested, and evaluated. What are the significant impacts of these hypothetical approaches?
- 4. Table 1.0-1 Summary Table of Significant Impacts and Mitigation Framework to Reduce Impacts**
N-18 **Air Quality**
Comment: The analysis identifies significant, unavoidable impacts due to concentrated carbon monoxide (CO) "hot spots" due to traffic impacts. It should be discussed that many of the "hot spots" are being created due to the higher density development being encouraged and promoted in the General Plan and is therefore a directly a result of the General Plan.
- 5. Health and Safety** (Section 3.5) (page 1.0-9) (page 3.5-14):
N-19 **A. Environmental Impact-**
 The PEIR identifies that "the Airport Environs Overlay Zone (AEOZ) covers less area than the boundaries of the airport influence area, which could allow the development of future projects that could pose a potentially significant impact outside of the AEOZ boundaries, but within the airport influence area."
Comment: No mitigation is proposed. The mitigation should be stated to make the two consistent.

- N-15 A draft of proposed Findings of Fact and Statement of Overriding Considerations in accordance with CEQA Guidelines section 15091 has not yet been prepared but will be available for review when the staff report to the Planning Commission on the General Plan Amendment is distributed. It is anticipated that the implementation of the General Plan policies will result in beneficial effects in most, if not all, of the issue areas discussed in the PEIR. The beneficial effects will be included in the Statement of Overriding Considerations.
- N-16 The AISD comment of strong support for the Enhanced Sustainability Alternative is noted. This alternative would further reduce environmental effects of the Draft General Plan related to energy and water consumption, solid waste generation, water quality and air quality by adding mandatory policies to the Draft General Plan to enhance the sustainability of future development within the plan area.
- N-17 General Plan parking policies are based on a substantial body of research and public input. Past public events, workshops, and programs that have contributed to the current draft proposal include, but are not limited to: American Planning Association/Women's Transportation Seminar Parking Symposium (2006); Manager's Parking Task Force Report (2004); Council Policy 100-18, Community Parking District Policy (2004); Uptown Parking Summit (2004); Manager's Report No. 03-205 (2003); and Manager's Report No. 03-113 (2003). The policies as drafted are designed to allow for flexibility in implementation.
- N-18 Higher-density development may increase the likelihood of more CO "hot spots," which generally occur during the morning and evening commute periods. However, it is the intent of the General Plan that new higher density development be located in areas served by transit so that an increased percentage of work commute trips during the AM and PM peak traffic periods will use public transit.
- N-19 See responses to comments N-2 and N-3.

AIA San Diego

A Chapter of The American Institute of Architects

June 24, 2007



Marilyn Mirrasoul
 Environmental Planner
 Development Services Department
 122 First Avenue, MS-501
 San Diego, CA 92101

Re: Additional comments on the Program Environmental Impact Review (PEIR)
 for the City of San Diego Final Draft General Plan

Dear Ms. Mirrasoul:

AIA San Diego (AIASD) would like to thank the City of San Diego for the 17-day extension to review the Program Environmental Impact Report (PEIR) for the Draft General Plan for the City of San Diego. Unfortunately, the length of the extension has not enabled us to complete our review, but we would like to forward these additional comments and concerns about potential significant impacts, which we do not believe have been adequately addressed in the PEIR.

As stated in our previous letter, dated June 1, 2007, in which we requested additional time to review the document, the PEIR represents an excellent in-depth analysis, but based on our preliminary review we have identified some significant questions. We look forward to reviewing your responses and to participating in continuing dialogue.

Respectfully,

Paul E. Schroeder, AIA
 President

cc: Mayor Jerry Sanders

Scott Peters, Council President, City of San Diego
 Kevin Faulconer, Councilmember, City of San Diego
 Tori Atkins, Councilmember, City of San Diego
 Tony Young, Councilmember, City of San Diego
 Brian Maischein, Councilmember, City of San Diego
 Donna Frye, Councilmember, City of San Diego
 Jim Madaffer, Councilmember, City of San Diego
 Ben Hueso, Councilmember, City of San Diego
 Jim Waring, Deputy Chief Operating Officer for Land Use and Economic
 Development
 William Anderson, Director of Planning and Community Investment

**AIA San Diego Comments
Relative to the Program Environmental Impact Review (PEIR)
for the City of San Diego Final Draft General Plan**

- 0-1** 1. **Executive Summary 1.3 Summary of Environmental Impacts and Mitigation Measures** (page 1.0-3): "As such, each of the issue areas identified above describes impacts that may remain significant and unavoidable even with the proposed program level mitigation framework."
Comment: What are the overriding findings to approve the significant unmitigated impacts?
- 0-2** 2. **Enhanced Sustainability** (page 1.0-5):
Comment: ALASD strongly supports the Enhanced Sustainability Section.
- 0-3** 3. **Increased Parking Management** (page 1.0-5):
Comment: ALASD understands that a joint Planning Commission and LU&H workshop on parking is scheduled for August 2007. This section appears to establish direction in a General Plan prior to the workshop. The General Plan needs to be written to allow flexibility as different methods of parking management tools are tried, tested, and evaluated. What are the significant impacts of these hypothetical approaches?
- 0-4** 4. **Table 1.0-1 Summary Table of Significant Impacts and Mitigation Framework to Reduce Impacts**
Air Quality
Comment: The analysis identifies significant, unavoidable impacts due to concentrated carbon monoxide (CO) "hot spots" due to traffic impacts. It should be discussed that many of the "hot spots" are being created due to the higher density development being encouraged and promoted in the General Plan and is therefore a directly a result of the General Plan.
- 0-5** 5. **Health and Safety** (Section 3.5) (page 1.0-9) (page 3.5-14):
A. Environmental Impact-
 The PEIR identifies that "the Airport Environs Overlay Zone (AEOZ) covers less area than the boundaries of the airport influence area, which could allow the development of future projects that could pose a potentially significant impact outside of the AEOZ boundaries, but within the airport influence area."
Comment: No mitigation is proposed. The mitigation should be stated to make the two consistent.

- O-1 See response to comment N-15.
- O-2 Noted. See response to comment N-16.
- O-3 See response to comment N-17.
- O-4 See response to comment N-18.
- O-5 See response to comments N-2 and N-3.

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0-6

B. Mitigation Framework-

Comment: The PEIR identifies mitigation for discretionary projects, but it fails to address the mitigation for nondiscretionary projects.

6. Land Use (Section 3.8, page 1.0-10):

A. Environmental Impacts-

Comment: Though the Draft General Plan does not change land uses, the PEIR must endeavor to identify and evaluate specific inconsistencies between community plans, the Zoning Code, existing land uses and City policies. The PEIR statement that "implementation of the Draft General Plan could yield significant impacts to land use" is inadequate. One specific example is the impact on existing allowable uses in industrial areas, which is not identified in the PEIR. There are others examples, and it is the responsibility on the PEIR to identify them.

0-7

Comment: PEIR must further identify the significant impacts of those inconsistencies. What is the impact on the ability to develop new projects or expand existing facilities, which are consistent with the Land Development Code (LDC) and community plans, but are inconsistent with the General Plan?

0-8

B. Mitigation Framework-

Comment: It is the responsibility of the PEIR to identify a mitigation or implementation plan for transitioning community plans, the Zoning Code, existing land uses and City policies toward greater consistency with the General Plan. It is inadequate to defer mitigation of inconsistencies to some unknown date of a community plan update or some unspecified private development project. How long does the PEIR anticipate that these significant impacts will exist?

0-9

C. Page 3.8-2.9 states, "There may be a situation where a community plan does not implement the General Plan to the maximum extent possible, however, it is anticipated that competing goals can be resolved through discretionary review."

0-10

Comment: What if the project is a ministerial permit

7. Noise (Section 3.10, page 1.0-11):

A. Environmental Impacts-

Comment: In general this section is very well done, but it fails to analyze the impact of new noise policies on existing land uses that currently have ambient noise levels that exceed the noise thresholds established in the General plan and thus prohibit the implementation of the community plans. It fails to analyze where these inconsistencies occur and whether it is practical,

0-11

O-6 See response to comment N-3.

O-7 See response to comment N-4.

O-8 See response to comment N-5.

O-9 See response to comment N-6.

O-10 See response to comment N-7.

O-11 The Draft General Plan Noise – Land Use Compatibility Guidelines in the Noise Element are applicable to the development of future land uses. The policies would not affect existing land uses even if such uses would be considered incompatible with the General Plan Land Use Compatibility Guidelines. The City has included additional discussion in PEIR section 3.10 and generalized planned land use based on adopted community plans to Figures 3.10-2, 3.10-3, 3.10-4, 3.10-5, 3.10-6, 3.10-7, 3.10-8, 3.10-9, and 3.10-10 concerning the impact of the Noise Element policies and compatibility guidelines to adopted community plans in the environs for San Diego International Airport (SDIA).

For SDIA, the Draft General Plan policies would conditionally limit future single-family residential uses to the 65 dBA CNEL expected on existing single-family lots and would conditionally limit multifamily and mixed-use residential uses in an environment of up to 70 dBA CNEL. Although not generally considered compatible, the City would allow multifamily and mixed-use residential uses exposed to noise up to 75 dBA CNEL in areas surrounding SDIA with existing residential uses that are designated for multifamily or mixed-use residential consistent with adopted community plans and the Airport Land Use Compatibility Plan for SDIA along with noise mitigation measures to ensure an interior noise level of 45 dB CNEL.

The adopted Downtown and Uptown community plans designate properties for multifamily and mixed-use residential uses in areas exposed to noise above the 75 dBA CNEL. The adopted ALUCP

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(currently in place) contains polices that conditionally allows residential uses to be exposed to noise up to 85 dBA CNEL.

Due to the aforementioned factors, it is anticipated that development in such areas would be able to proceed with the appropriate mitigation to reduce interior noise levels down to 45 dB CNEL.

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feasible, or appropriate to amend the community plans to be consistent with the General Plan. The General Plan needs to provide flexibility to accommodate and address areas such as Bankers Hill along Columbia Street, Little Italy, and Uptown between Grape and Hawthorn Streets for example, which would be significantly impacted by the General Plan criteria. The PEIR should identify for decision makers where else these significant impacts would occur in order for them to make an informed decision on the Overriding Finding that will be required. What are the Overriding Findings?

0-12

8. 2.4.0 Project Description (page 2-22)

"The Project also includes General Plan update companion items including: code amendments to eliminate references to the tier system; code amendments to the Municipal Code Section 122.0101-122.0104 to revise or eliminate the section to address revisions to Plan Amendment Initiation Criteria; and adoption of an ordinance to authorize implementation of the state Subdivision Map Act/Quimby Act and provides a methodology for collecting land and/ or appropriate park fees from new subdivisions for population-based parks and recreation facilities to serve future residents."

0-13

Comment: Have these companion elements been developed and are they available for public review?

9. Page 2-29

"No land use designation or zoning changes are proposed as part of the General Plan update process."

0-14

Comment: The statement is grossly misleading. Code changes, rezoning and community plan updates, which change land uses will be necessary in order to achieve consistency with the general plan. Therefore, though the General Plan, in and of itself, does not change land-use designation or zoning changes, it will cause those changes to happen.

10. Page 3.5-10

"Implementation of new base zone use packages, designed to provide new mixed-use zone categories will also address issues to avoid incompatible uses within Industrial and Commercial zones."

0-15

Comment: What are these new base zones use packages? What are these mixed-use zone categories? The PEIR needs to identify the incompatible uses within the Industrial and Commercial zones, which are being created by the General Plan.

11. Page 2.54 Mitigation Framework

- O-12 See response O-11. Also, refer to Section 15093 of the State CEQA Guidelines for a more detailed discussion of overriding considerations.
- O-13 The City is preparing the code amendments related to the tier system and initiation criteria. The Quimby Act ordinance will be prepared subsequent to General Plan adoption. Once the draft amendments and ordinance are completed they will be available for public review.
- O-14 The EIR Section 2.4.0 (p. 2-23) states that "the Draft General Plan does not change land uses, but rather provides the framework and policy direction for future community plan updates." This statement is not intended to be misleading, but rather to assure the public that no physical development would be authorized at the time of the General Plan adoption. However, staff concurs that future implementation actions will likely result in land use designation and zoning changes. In fact, Draft General Plan Policy LU-F.1 calls for the City to "apply existing or new Land Development Code zone packages or other regulations as needed to better implement the policy recommendations of the General Plan; land use designations of the community plans; other goals and policies of the community plans; and community specific policies and recommendation." The reliance on future community plan updates and code amendments is further discussed in EIR pages 2-54 and 3.8-36, and Draft General Plan Land Use and Community Planning Element Sections A-C. In addition, EIR Figure 2.1-0 graphically shows that future environmental review will be needed for future community plan and zoning actions.
- O-15 The General Plan does not change the land use designation or zoning of specific properties. However, future implementation actions will likely result in land use designation and zoning changes. The Draft General Plan provides a menu of Land Use categories that may be applied as a part of community plan updates and amendments. These Land Use categories are found on Table LU-4 of the Land Use and Community Planning Element (pg. LU-15).

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- The last bullet on page 3 5-16 addresses mitigation for discretionary projects in the ALUCPs.
- 0-16** **Comment:** PEIR fails to address mitigation for ministerial permits in the ALUCPs.
12. **On page 3.8-27**, the PEIR states, "An inconsistency with an adopted plan is not by itself a significant impact. The inconsistency must relate to a physical environmental impact to be considered significant under CEQA."
Comment:
- 0-17**
1. The PEIR must endeavor to identify and evaluate inconsistencies between community plans, the Zoning Code, existing land uses and City policies. The PEIR statement that "implementation of the Draft General Plan could yield significant impacts to land use" is inadequate. One specific example is the impact on existing allowable uses currently allowed in industrial areas, but that would be prohibited in the future. This is not identified in the PEIR. There are others examples, and it is the responsibility of the PEIR to identify them.
 2. It must further identify the significant impacts of those inconsistencies. What is the impact on the ability to develop new projects or expand existing facilities, which are consistent with the Land Development Code (LDC) or Community Plans, but that are inconsistent with the General Plan?
 3. It is the responsibility of the PEIR to identify a mitigation or implementation plan for transitioning community plans, the Land Development Code, existing land uses and City policies toward greater consistency with the General Plan. Shall the General Plan, Community Plan or the Development Regulations take precedence until such time as consistency is achieved?
 4. ALASD believes that "creates substantial inconsistencies with existing zoning and community plans" should be identified in Section 3.8.2, Thresholds of Significance.
- 0-18**
13. **Page 3.8-28** states: "While the draft General Plan policies are consistent with the Coastal Act policies and do not require amendments to the City's LCP land use plan at this time, there is a potential that future actions could result in a need for LCP amendments."
Comment: If future actions requiring LCP amendments are the result of achieving consistencies with the General Plan, they should be identified as part of the PEIR.
- 0-19**
- 0-20**
- 0-21**
14. **Page 3.8-28** last paragraph states: "However, discretionary review of public and private projects will evaluate whether proposed projects implement specified land use, density/intensity, design guidelines.

Further environmental review will be needed for future community plan and zoning actions involving application of new Land Use categories. The Economic Prosperity Element includes a number of policies (EP-A.4, EP-A.6, EP-A-11, EP-A.13, EP-A.17, EP-A.20, EP-A.21, and EP-B.13) to guide application of these Land Use categories in a manner that does not create incompatible uses. Incompatible uses can not be identified at this time without a specific rezone or community plan amendment proposal. Any rezone or community plan amendment would be subject to additional environmental review.

O-16 See response to comment N-3.

O-17 See responses to comments N-10 and N-6.

O-18 See responses to comments N-10 and N-6.

O-19 See responses to comments N-10 and N-6.

O-20 The intent of the suggested text is addressed by the Development Services Department's CEQA Significance Determination Thresholds which state that "The project should be assessed for consistency with any of the adopted plans and regulations (City of San Diego Municipal Code) which govern the region and the particular site. An inconsistency with a plan is not by itself a significant environmental impact; the inconsistency would have to relate to an environmental impact to be considered significant under CEQA." See also the staff response to Comments O-17 and 19.

O-21 The General Plan does not amend individual community plans. Identifying specific examples of what could happen as a result of a future community plan update, such as a potential conflict with the Local Coastal Program, is speculative and beyond the scope of this EIR. Additional environmental review will be conducted as community plans are updated and LCP amendments proposed.

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Airport/Land Use Compatibility Plans, and other General Plan and community plan policies including open space preservation, community identity, mobility, and the timing, phasing, and provision of public facilities and ensure that they do not adversely affect the General Plan and community plans." Further on page 3.8-29, the PEIR states: "There may be a situation where a community plan does not implement the General Plan to the maximum extent possible, however, it is anticipated that competing goals and policies can be resolved through the discretionary review process."

0-22

Comment: Does the PEIR intend that all projects should be discretionary in order to mitigate the significant impacts of inconsistencies created by the General Plan? What happens to current ministerial permits? How much more time and cost to the city and the private sector is anticipated as a result of delays in the discretionary review process to resolve conflicts between the General Plan, LDC, and the community plans? These are all significant impacts that need to be addressed in the PEIR.

15.

Page 3.8-32 "mixed-use projects may also result in environmental impacts related to noise, lighting, and odors due to mixed use projects such as residential/night club/restaurant; noise and air quality impacts due to residential proximity to transit corridors and streets; and possible noise, facilities, and public health impacts due to mixing of employment/industrial/residential uses."

0-23

Comment: The PEIR, after identifying these potentially significant impacts, fails to address mitigation. Instead, it goes on to address minimizing only land-use incompatibilities.

16.

3.8-33 Mixed-Use Village Development

Comment: This section fails to address the potentially significant impact of mandating the creation of mixed-use zones by the General Plan. Will the new mixed-use zones require vertical mixed-use development? Will the mixed-use development be feasible based on economic conditions? Or would it be imposed on a piece of property large enough to handle mixed-use development? If the mixed-use zoning is horizontal, why isn't existing zoning adequate? These are significant impacts that are not identified in the PEIR.

0-24

17.

The PEIR states (page 3.8-34) "The identification of prime industrial land does not affect existing land use designation or zoning."

0-25

Comment: Yet, in order to achieve consistencies between the general plan, community plan, and existing zoning, some existing land uses such as Coleman College, Maric College, credit unions, and multi-tenant offices, which are currently allowed in community plans such as Kearny Mesa and its

O-22

The PEIR does not intend that all projects should be discretionary in order to mitigate any significant impacts of inconsistencies created by the General Plan. Project review will continue to follow the Land Development Code, which determines whether or not a project requires discretionary review. The PEIR acknowledges that some projects are ministerial and therefore, not subject to the identification and mitigation of possible impacts.

If a project is consistent with the community plan land use designation, then by default it is consistent with the General Plan land use designation, since the General Plan land use map is a compilation of the community plan land use maps. To clarify this point, Policy LU-C.1 has been revised to include a sub-item "b" as follows: "Rely on community plans for site-specific land use and density/intensity designations and recommendations." In addition, page 3.8 of the Draft EIR states "The adopted community plans have been and will remain the authority for land use, density, and site specific recommendations."

If a project is consistent with the community plan and LDC, and is processed through a ministerial permit, then the General Plan is not a part of the review process. If the project is processed through a discretionary project, the community plan and General Plan will be used by City staff to evaluate the project.

O-23

At the General Plan level, it is impossible to determine the specific mitigation necessary for future projects; however, the PEIR provides a program-level mitigation framework to reduce potential impacts. As the PEIR states in the last paragraph on page 3.8-32, "since no specific development project is proposed at this time, no project-level mitigation can be developed at this time to address potential environmental impacts." Because it is not possible to foresee future project impacts, the PEIR was developed with the assumption that future projects have the potential to result in impacts in many issue areas.

O-24

See response to comment N-12.

O-25

See response to comment N-12.

underlying zoning, will all become previously conforming. That is a significant impact that is not addressed in the PEIR.
Comment: The PEIR fails to identify that the proposed boundary of the Prime Industrial Land Map in Kearny Mesa is within the 1,000-foot buffer of existing residential uses, which is contradictory to criteria established in Appendix C EP-2 of the General Plan for Collocation. As such, this should be considered a significant impact.

0-26

18. Page 3.8-34 "The menu of community plan land use designations also include a new designation, Business Park/ residential."

0-27

Comment: What will the new zoning regulations look like? What impact will this have on existing zoning? Will it require rezoning for consistency with the General Plan? What types of employment uses will be allowed in this new zone to avoid environmental impacts on residential?

19. Page 3.8-34 "As part of community plan updates, implementation of new base zone use packages or modifications to existing zones, designed to provide new mixed-use zone categories will also address issues to avoid incompatible uses within Industrial and Commercial zones."

0-28

Comment: This statement implies that new base zone packages are needed to address significantly adverse impacts due to incompatibilities within Industrial and Commercial zones. What are the incompatibilities and the significant impacts? How will the mixed-use zone address incompatibilities between Industrial and Commercial zones? Existing zoning currently allows various combinations of Industrial and Commercial. Doesn't mixed-use generally imply residential in the General Plan? Is the creation of a mixed-use zone mandating mixed-use development a significant impact? The PEIR fails to define the mixed-use requirement or how or where it will be implemented.

20. Section 3.8.4 first paragraph page 3.8-35 states "The City's process for evaluation of discretionary projects includes environmental review and documentation pursuant to CEQA as well as an analysis of those projects for consistency with the goals, policies and recommendations of the General Plan and the applicable Community Plan."

0-29

Comment: What is the significant impact on the project, the property, its owner, and how it is mitigated, when the General Plan creates an inconsistency between the General Plan and the Community Plan due to the adoption of this General Plan. The PEIR fails to even identify that this significant impact is the result of the adoption of the General Plan. Will properties not

O-26 See response to comment N-13.

O-27 The implementation of the new Business Park/Residential land use designation has not been determined. It may involve a zone which contains a combination of use limitations and development standards to avoid land use conflicts. It is also possible that a more site-specific method to implement this category would be established through a CPIOZ designation which would be adopted in a future community plan which proposes this designation. Any proposed land use changes would be subject to the appropriate environmental review.

O-28 The establishment of a mixed-use (with residential) land use designation or any other land use designation containing a variety of uses will require the best possible implementation methods which will be established subsequent to the General Plan adoption. As stated in response to comment O-27, new zones or zone packages will utilize a combination of use categories or subcategories and development standards to avoid potential incompatibilities as discussed in the Land Use Mitigation Framework. It is also possible that the use of CPIOZ or other community plan policies will assist with land use designation implementation.

O-29 See responses to comment N-10 and N-6.

be redeveloped because of the inconsistencies and the cost of the bureaucratic process of dealing with these inconsistencies? Will this result in physical blight? Is there a significant economic impact on property owners if they are not able to lease to new tenants who are similar to existing tenants, simply because they are no longer consistent with the General Plan? Is there a significant impact on properties that were previously conforming to the current General Plan, but that would not be able to expand their facilities because their use is no longer consistent with the proposed General Plan? This section also only deals with using discretionary review as a means to mitigate impacts. It fails to address the significant impact caused by ministerial permits that may not be consistent.

21. Page 3.8-36 "Implementation of new base zone use packages, designed to provide new mixed-use zone categories will also address issues to avoid incompatible uses within Industrial and Commercial Zones. Existing and future regulations will also provide development standards aimed at reducing land use incompatibilities."

Comment: PEIR should identify the "issues." How does the mixed-use zone (currently not defined) or the future regulations (currently not defined) address the issues, which are not clearly defined?

0-30

22. Section 3.10 Noise—

Comment: In general this section is very well done, but it fails to analyze the impact of new noise policies on existing land uses that currently have ambient noise levels that exceed the noise thresholds established in the General plan and thus prohibit the implementation of the community plans. It fails to analyze where these inconsistencies occur and whether it is practical feasible or appropriate to amend the community plans to be consistent with the General Plan. The General Plan needs to provide flexibility to accommodate and address areas such as Bankers Hill along Columbia, Little Italy, and Uptown between Grape and Hawthorn for example, which would be significantly impacted by the General Plan criteria. The PEIR should identify for decision makers where else these significant impacts would occur in order for them to make an informed decision on the Overriding Finding that will be required. What are the Overriding Findings?

0-31

Comment: What are the significant noise impacts associated with the mixed-use zoning that the General Plan proposes to require?

0-32

O-30 See the response to comment O-23.

O-31 See the response to comment O-11 and 0-12.

O-32 The General Plan is not proposing to require the implementation of mixed-use zoning, but rather provides a framework for future community plan updates. Under section 3.10.1, the DEIR addresses residential mixed-use in the subsection "Other Noise Sources." The City will replace the "Other Noise Sources" heading with additional subsection headings to assist the reader in identifying the discussion of mixed-use in the DEIR.

Under section 3.10.3, the DEIR addresses impacts residential mixed-use in the subsection "Commercial and Industrial Noise." The City will include Mixed-Use in the subsection heading. The City will also separate the discussion of the commercial and mixed-use noise impacts from the discussion of the industrial noise impacts to assist the reader in identifying the discussion of mixed-use in the DEIR. See response to comment O-23.

23. Page 3.10-22 states "... transportation noise could significantly increase with implementation of the Draft General Plan."
Comment: Yet the PEIR continues to address only airport noise levels. What about the transportation noise due to increase density called for in the General Plan? If this impact is the result of the requirements in the General Plan, then it should be addressed in the General Plan and not simply passed to future private development, which is simply striving to be consistent with the General Plan.
- 0-33**
24. Page 3.10-23, the PEIR identifies "the potential to permit ministerial projects that may not be consistent with the Draft General Plan policies and noise guidelines prior to future amendments."
Comment: Is there mitigation or is this a significant unavoidable impact?
- 0-34**
25. **General Plan Implementation -**
Comment: The PEIR should identify the key components and timing of the Draft General Plan-Action Plan over the next five years. It should also address how significant impacts will be mitigated during the transition period. Does this mean that all community plans and modifications to the Land Development Code will be made within the next five years? Shall the General Plan, Community Plan or the Development Regulations take precedence until such time as consistency is achieved?
- 0-35**

O-33 The City has added the following discussion to PEIR Section 3.10-3 under Transportation addressing Motor Vehicle Traffic Noise: "The SANDAG forecasted increase in housing units and jobs by 2030 is expected to lead to an increase in the level of motor vehicle traffic as addressed in PEIR Section 3.15. An increase in motor vehicle traffic has the potential to increase motor vehicle traffic related noise. It is likely that the greatest increase in motor vehicle traffic noise will be on interstate freeways, state highways, and major roadways in the City. Development of mixed-use land uses or multifamily residential land uses on transit corridors along major roadways in existing urban areas could also expose more people to the higher levels of noise generated by higher traffic volume roadways. Thus, transportation improvements associated with the Draft General Plan could create noise impacts on noise-sensitive land uses.

The Draft General Plan includes policies to minimize vehicle traffic noise impacts on noise-sensitive land uses. These policies encourage planning of noise-compatible land uses, traffic control measures to slow traffic and thus reduce vehicle traffic noise in noise-sensitive locations, the provision of alternative transportation modes, rerouting of truck routes, the use of landscaping and other design features, and enforcement of the state vehicle code to ensure that vehicles are not producing excessive noise. An increase in motor vehicle traffic would yield a proportionate increase in noise in areas adjacent to freeways, state highways, and major roads in the City and thus could create a significant impact on sensitive-noise land uses."

O-34 Pursuant to Section 21080 (b)(1) of the California Public Resources Code, ministerial projects are exempt from the requirements of CEQA. The ministerial project exemption is statutory; that is, it is a class of project the California State Legislature has determined to be exempt despite the potential for environmental impacts. Therefore, because ministerial projects are exempt from CEQA, no mitigation can be required even if the project would result in impacts. However, it should be noted that most ministerial projects are relatively small and unlikely to create many significant impacts. Despite the CEQA exemption,

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ministerial projects must adhere to state, federal, and local laws, all of which may reduce the potential for impacts. (See Article 18 -- Sections 15260 through 15285-- of the State CEQA Guidelines for a more detailed discussion and identification of statutory exemptions.) In PEIR Section 3.10-4, the City has added the following_“and could result in impacts that could be considered significant and unavoidable” after the following sentence: “However, the existing standards, codes, and regulations have the potential to permit ministerial projects that may not be consistent with the Draft General Plan policies and noise guidelines prior to future amendments.”

O-35 See response to comment N-14.



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May 30, 2007

Ms. Marilyn Mirasoul
Environmental Planner
City of San Diego Development Services Center
1222 First Avenue, MS 501
San Diego, CA 92101

RE: City of San Diego General Plan Update Draft Environmental Impact Report (PEIR)
Project No. 104495, SCH No. 2006091032

Dear Ms. Mirasoul:

For the past six months, a San Diego Regional Chamber of Commerce stakeholders working group, comprised of a diverse mix of business and planning industries, has been reviewing the Draft General Plan Update in detail. The working group is currently formulating comments on the Update, based on months of discussions and collaboration.

The Program Environmental Impact Report (PEIR), which was released April 25, 2007, provides an extensive analysis of the impacts of the General Plan. The Chamber commends the City for the hard work that has gone into both of these documents. The General Plan is creating the policies that will establish the land use vision of San Diego for the next 20 years, and it is essential for the future of our city that a thorough analysis of these documents be conducted.

There appears to be a great deal of excellent and in-depth analysis in the PEIR. However, based on our preliminary review, we have identified a series of significant questions (listed in Attachment A) that, in our opinion, need to be addressed. The Chamber of Commerce wishes to be a participant and contributor to this process, unfortunately 45 days is an inadequate amount of time to thoroughly analyze the PEIR and provide thoughtful comments. A more in-depth review on our part is necessary to fully explore the PEIR and make additional comments. Therefore, we request an extension of time for the public review of the PEIR.

Thank you for taking our comments under consideration.

Sincerely,

A handwritten signature in black ink, appearing to read 'Scott D. Alvey'.

Scott D. Alvey
Vice President
Public Policy & Communications

SDA:av

COMMENTS

RESPONSES

ATTACHMENT A

San Diego Regional Chamber of Commerce Comments
City of San Diego General Plan Update Draft Environmental Impact Report (PEIR)
Project No. 104495, SCH No. 2006091032

Comment A:
Health and Safety (Section 3.5)

1. Environmental Impact

- The PEIR identifies that "the Airport Environs Overlay Zone (AEOZ) covers less area than the boundaries of the airport influence area, which could allow the development of future projects that could pose a potentially significant impact outside of the AEOZ boundaries, but within the airport influence area." The mitigation should be to make the two consistent.

P-1

2. Mitigation Framework

- The PEIR identifies mitigation for discretionary projects but fails to address the mitigation for nondiscretionary projects

P-2

Comment B:
Land Use (Section 3.8)

1. Environmental Impact

- Inconsistencies: The PEIR states (page 3.8-27), "An inconsistency with an adopted plan is not by itself a significant impact. The inconsistency must relate to a physical environmental impact to be considered significant under CEQA."

P-3

- Though the Draft General Plan does not change land uses, the PEIR must endeavor to identify and evaluate specific inconsistencies between community plans, the Zoning Code, existing land uses and City policies. The PEIR statement that "implementation of the Draft General Plan could yield significant impacts to land use" is inadequate. For example:

- *On June 13, 2007, the City will release a report to the Code Monitoring team on how to address the inconsistencies between the General Plan and the Land Development Code. The Chamber needs to have the opportunity to review that report prior to responding to the PEIR which is due on June 8.*

P-4

- It must further identify the significant impacts of those inconsistencies. What is the impact on ability to develop new projects or expand existing facilities, which are consistent with the Land Development Code (LDC) and community plans, but are inconsistent with the General Plan?

2. Impact Analysis

- The PEIR states (page 3.8-29), "There may be a situation where a community plan does not implement the General Plan to the maximum extent possible, however, it is anticipated that competing goals can be resolved through discretionary review." What if the project is a ministerial permit?

P-5

3. Mitigation Framework

- It is the responsibility of the PEIR to identify a mitigation or implementation plan for transitioning community plans, the Zoning Code, existing land uses and City policies toward greater consistency with the General Plan. It is inadequate to defer mitigation of inconsistencies to some unknown date of a community plan update or some unspecified private development project. How long does the PEIR anticipate that these significant impacts will exist? Shall the General Plan, Community Plan or the Development Regulations take precedence until such time as consistency is achieved?

P-6

P-1 See response to comment N-2.

P-2 See response to comment N-3.

P-3 The Development Services Department's CEQA significance thresholds state that "The project should be assessed for consistency with any of the adopted plans and regulations (City of San Diego Municipal Code) which govern the region and the particular site. An inconsistency with a plan is not by itself a significant environmental impact; the inconsistency would have to relate to an environmental issue to be considered significant under CEQA."

In this case, the Project is an update to the City of San Diego's General Plan. The California Supreme Court has called the general plan the "constitution for future development." It is expected that in the course of implementing the General Plan there will be associated plan, policy, and code amendments. The General Plan policies need to be evaluated per CEQA, but the potential inconsistency of a particular code or policy with the Draft General Plan, is not by itself a significant environmental issue. For example, the General Plan contains extensive policies on mixed-use, village development. Not all community plans identify village, or village-like sites, so community plan updates/amendments will be needed to address this issue. A community plan that does not currently identify village sites is not inconsistent with the General Plan, it simply does not fully implement the General Plan's recommendations.

The General Plan PEIR concludes that conflicts with other adopted plans are considered "significant and unavoidable" not because the General Plan's policies are incompatible with adopted plans, but rather due to the uncertainty related to future plan amendments and project reviews.

The General Plan does not change the land use designation or zoning of specific properties. The General Plan provides a menu of Industrial Land Use designations that are to be applied as a part of community plan updates and amendments.

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- P-4 If a project is consistent with the community plan land use designation, then by default it is consistent with the General Plan land use designation, since the General Plan land use map is a compilation of the community plan land use maps. To clarify this point, Policy LU-C.1 has been revised to include sub-item “b” as follows: “Rely on community plans for site-specific land use and density/intensity designations and recommendations.” In addition, page 3.8 of the Draft EIR states “The adopted community plans have been and will remain the authority for land use, density, and site specific recommendations.”
- P-5 See response to comment N-7.
- P-6 See response to comment N-6.

ATTACHMENT A (continued)

**Comment C:
Economic Prosperity Element**

The PEIR states (page 2-35) "the Element also expands the traditional focus of a general plan to include economic development policies that have a less direct effect on land use." The Chamber of Commerce believes that it is essential that the City of San Diego establishes an Economic Prosperity Policy, but questions the appropriateness of including non-land use policies in the General Plan, such as:

P-7

- *A city that provides life-long skills and learning opportunities by investing in excellent schools, post-secondary institutions, and opportunities for continuous education and training.*
- *Equitable access to educational opportunities.*
- *A higher standard of living through increased wages and benefits in low-wage industries.*

**Comment D:
General Plan Implementation (Section 2)**

The Draft General Plan - Action Plan is key to the success of the General Plan (page 2-51). Either a weak Action Plan or a breakdown in its implementation would create significant impacts on the City and the General Plan, on many different levels. Despite this importance, the PEIR simply states that all collaboration in plans, strategies, regulations, etc. will be coordinated through the Action Plan.

P-8

There is no discussion of the impacts, nor mitigations, should the Action Plan falter. This analysis is much too vague. The PEIR should identify the key components and timing of the Draft General Plan-Action Plan over the next five years. It should also address how significant impacts will be mitigated during the transition period. Does this mean that all community plans and modifications to the Land Development Code will be made within the next five years? Shall the General Plan, Community Plan or the Development Regulations take precedence until such time as consistency is achieved? These are just a few of the basic questions and concerns over the Action Plan implementation.

P-7 This comment does not address the adequacy of the environmental document. The City of San Diego is responsible for the health, safety, and welfare of its citizens. That is why the overriding goal of the Economic Prosperity Element is to increase the standard of living of all San Diegans. To the extent that the City is involved in policies and programs regarding education, workforce expansion, and equal opportunity, these policies are included to clearly state the City's intention to provide all of its citizens the opportunity to participate successfully in our local economy.

P-8 See responses P-3 and P-4 above regarding consistency. Regarding the Action Plan, when the Strategic Framework Element was adopted in 2002, there was an associated Five-Year Action Plan that outlined specific actions needed to implement the new Element. A new Action Plan is being prepared to correspond to implement the policies in the updated General Plan elements. Much of the background information for the policy development is in the Strategic Framework Element and Five-Year Action Plan. Staff had intended to prepare an Action Plan within 60 days subsequent to General Plan adoption. However, given public comments on this topic, a draft of the Action Plan will be prepared for public review prior to General Plan adoption. The EIR evaluates potential impacts of the policies of the General Plan, but does not speculate as to the impacts of future actions designed to implement those policies. In fact, most issues areas were assumed to have significant and unavoidable impacts precisely because it is not possible to clearly define and evaluate future implementation actions. For that reason, future actions will undergo additional environmental review.

June 25, 2007

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

RE: Comments on Draft Programmatic EIR for General Plan Update

Dear Ms. Mirasoul:

The Building Industry Association of San Diego County represents 1,460 member companies comprising a workforce of 165,000 San Diegans. Thank you for this opportunity to submit comments on the Draft General Plan Update Programmatic EIR (PEIR) for the City of San Diego.

We have significant concerns with the environmental analysis in the document. There appears to be a disconnection in the PEIR with the various existing regulations and programs which will affect all future development, construction activities and growth in the city. For example, there is virtually no discussion of the city's Multiple Species Conservation Program in the EIR, and yet this program was developed in conjunction with and approved by the state and federal wildlife agencies as the city's mitigation for all future biological impacts in and outside of the MSCP preserve, with the exception of a species listed after the MSCP was approved.

Q-1

The EIR for the MSCP and Land Development Code changes (ESL regulations) found direct, indirect and cumulative biological impacts to be significant but mitigated both in and outside of the preserve (throughout the Subarea Plan for the city). The subsequent EIR prepared for the brush management regulations reaffirmed this conclusion. Therefore, this Programmatic EIR, which is analyzing impacts on a programmatic level, should use existing programs like the MSCP and the environmental analyses which have been prepared for those programs as the basis for determining significant impacts and mitigation measures. A similar approach should be employed with impacts like air quality and water quality which are being mitigated by state and federal laws. While the city may lack the ability fully mitigate these impacts on a programmatic level through the General Plan alone, the General Plan PEIR can and should rely on the implementation of the programs and regulations which do fully mitigate the impacts.

Q-2

Air Quality

Table 1.0-1 states that particulate matter from construction would be significant and unavoidable. Particulate matter from construction activities represents a small portion of the total particulate matter from diesel emissions. The bulk of the emissions comes from trucks, buses and ships. The California Air Resources Board has already adopted or is in

Q-1 A discussion of the MSCP and the Natural Habitat Planning and Open Space Conservation Programs of other jurisdictions in San Diego County is presented on pages 3.8-22 through 3.8-26 in the Land Use chapter of the EIR. In addition, much of the Biological Resources section of the EIR (pages 3.3-1 through 3.3-33 and Figure 3.3-2) is based on compliance with MSCP policies. The commenter is incorrect in stating the City's MSCP Subarea Plan mitigates "for all future biological impacts in and outside of the MSCP preserve, with the exception of a species listed after the MSCP was approved." As stated in Section 3.3, "Pursuant to the City's MSCP permit, the City of San Diego has incidental "take" authority over 85 rare, threatened and endangered species. This means that the City may incidentally impact these species without additional state or federal approval or permits. This "take" authority is used by City departments for public projects and is also conferred to third parties (e.g., private developers) who receive City of San Diego development permits. Because "take" authority is granted locally, City and private development projects are spared the significant time and financial costs of state and federal wildlife agency permitting processes. The MSCP incidental "take" permit, in accordance with the Implementing Agreement (IA) does not preclude impacts to habitat inside or outside the Multi-Habitat Planning Area (MHPA). Project level impacts would be required to mitigate in accordance with the City's Biology Guidelines, MSCP, and ESL regulations.

Q-2 The PEIR does not rely on the implementation of programs and regulations to mitigate impacts. As stated in the document, compliance with standards is required of all projects and is not considered to be mitigation. It is possible that for certain projects, adherence to regulations may not adequately address all impacts. Therefore, such projects would require additional measures to avoid or reduce significant impacts.

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the process of implementing emission standards for both existing and new trucks, buses, construction equipment and other sources of diesel emissions which are projected to reduce diesel emissions below today' level by 85%. *The CARB diesel regulations are the mitigation measures which will mitigate impacts from particulate matter as well as nitrogen oxides (NOx).* The impacts are actually being over-mitigated as emission levels decrease and the air quality improves, even in the face of population growth.

Q-3

Biological Resources

The Draft PEIR states that "the impact to biological resources remains significant and unavoidable." This conclusion is incorrect and inconsistent with the EIR prepared for the Land Development Code and the Multiple Species Conservation Program which concluded that direct, indirect and cumulative impacts to both MSCP covered species and non-covered species are mitigated throughout the MSCP Subarea Plan, in and outside of the preserve, by the implementation of the MSCP and the Environmentally Sensitive Lands Regulations. The Subsequent EIR prepared for the brush management regulations reaffirmed this determination. Presumably, the General Plan Update and subsequent Community Plan Updates will not consist of any reductions to the MSCP preserve or modifications to the Environmentally Sensitive Lands regulations which would reduce biological mitigation requirements. Therefore, no new, previously unanticipated biological impacts should result from the implementation of the General Plan and no new unmitigated impacts to biological resources should occur.

Q-4

It is essential that the General Plan PEIR reaffirm this conclusion. Otherwise, the PEIR will be inconsistent with the EIR for the MSCP and the Land Development Code, invalidating those EIR's and jeopardizing the MSCP itself. The impact analysis and cumulative impacts section of the General Plan PEIR need to be revised to be consistent with the MSCP/LDC EIR.

Geologic Conditions

It is not clear how the determination of significance has been made. Building and grading standards in conjunction with soil testing and geologic reporting are more than adequate to eliminate the risk of slope failure as a result of new construction. Therefore, the determination of significance is unsubstantiated.

Q-5

Historical Resources

The PEIR states that "implementation of the General Plan could result in significant impacts to historical resources...through substantial alteration to...landscapes..." It is not clear how a landscape can be considered a historical resource. This characterization is overly broad and confusing for the discussion on historical resources. Landscapes may contain historical sites or buildings, but they do not in and of themselves constitute historical resources as historical resources have been defined by CEQA.

Q-6

Q-3 Particulate Matter (PM) emissions during construction are typically more than 90 percent from fugitive dust generated from site preparation, excavation and grading, and truck operation on unpaved and paved roads. A very small fraction of construction PM comes from diesel engine exhaust. If forecast PM emissions on a project would exceed the City CEQA significance limits, mitigation would be required. The commenter is correct in stating that upgrades in construction equipment that result from EPA and ARB measures to reduce NOx and PM emissions from diesel engines will also reduce construction PM emissions. However, as noted above, this reduction would have a very small effect on the reduction of total PM construction emissions on a typical project.

Q-4 The comment "the EIR for the LDC and MSCP concluded that direct, indirect, and cumulative impacts to both MSCP covered species and non-covered species are mitigated throughout the MSCP Subarea Plan in and outside of the preserve, by the implementation of the MSCP and the Environmentally Sensitive Lands Regulations" is not completely correct. In fact, non-covered species are not always mitigated through the MSCP. Wetland impacts are also not mitigated through the MSCP. The EIR has been revised to clarify this issue. Furthermore, the City does not concur with the opinion that the adoption of the General Plan Update EIR would invalidate the LDC and MSCP EIRs, or jeopardize the MSCP itself. See responses Q-1 and Q-2.

Q-5 The commenter is correct in stating that regulations and procedures have been implemented by local, state and federal agencies to reduce the effects of such geologic hazards as earthquakes and landslides. These measures are described in Section 3.4.1 and include the City's use of the San Diego Seismic Safety Study as a guideline to correlate the acceptable risk of various land uses with seismic (and geologic) conditions identified for the site. In addition, slope instability or erosion problems in the City are primarily regulated through the California Building Code (CBC) and the City's grading ordinance. However, as described in Section 3.4.3, numerous structures throughout the City pre-date the most recent and more stringent seismic and geologic regulations currently in place, and expose people to increased risk. Although

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the City maintains regulations to identify potential hazards from unreinforced masonry bearing wall buildings, the regulations are largely voluntary and exempt many residential structures. Until those structures are replaced or substantially rehabilitated, existing risks from seismic and geologic hazards will remain. The Draft General Plan contains policies in the Public Facilities, Services and Safety Element which address geologic hazards and call for maintaining geologic hazard narrative and mapped information, adhering to state laws for seismic and geologic hazards, abating structures that present dangers during seismic events, and consultation with qualified geologists and seismologists on development projects. In addition, although rare, staff has required measures beyond adherence to regulations because the City's professional geologists have determined that additional protective measures are required. These measures are considered mitigation, and it is possible that future projects may also require additional protective mitigation measures. Since the Draft General Plan does not identify specific development projects and apply mitigation measures specific to the seismic or geologic conditions of those project sites, the potential for a significant and unavoidable impact cannot be assured at this program level of environmental analysis.

- Q-6 The City of San Diego Land Development Code Section 113.0103 does in fact recognize the existence of historical landscapes. Historical landscape is defined as “. . . a modified feature of the land that possesses historical, scientific, aesthetic, cultural, or ethnic significance to a neighborhood or community” as a historical resource. A historical landscape would meet the definition of a historical resource under CEQA.

Hydrology and Water Quality

The PEIR states that "significant unavoidable impacts related to absorption rates, drainage patterns, or rates of surface runoff remain." This conclusion is unsubstantiated and incorrect. New development is already required to comply with stringent water quality Best Management Practices during the construction phase and post construction phase. The new RWQCB Permit contains a lot of new standards addressing the impacts which this EIR states are unavoidable. The GP PEIR should reference these new standards as the mitigation requirements for new development as it relates to hydrology and water quality impacts. Existing hydrology and water quality impacts are also covered by the new RWQCB permit. As part of the permit, the city will be required to reduce pollutant loads from existing development. Therefore, these impacts will be mitigated. The GP PEIR should use the permit conditions as the framework for mitigation of these hydrology and water quality impacts.

Q-7

Land Use

A reference to "physically dividing communities" is made in the discussion regarding land use impacts. Please explain what this is referring to and how this constitutes a land use impact.

Q-8

Noise

The PEIR states that "although the General Plan PEIR identifies Mitigation Framework Measures to reduce these program level impacts, the degree of impact and applicability, feasibility, and success of these measures cannot be adequately know for each specific project...Therefore, the program level noise impact...remains significant and unavoidable." It is difficult to conceive of a project that would be allowed to occur with significant noise impacts that are not mitigated by the project (noise walls, sound insulation, berms, etc.). *The PEIR should address noise impacts then as mitigated by the city's noise ordinance and the "Mitigation Framework Measures."* If individual projects are unable to reduce noise impacts to below a level of significance, those projects will be required to address those specific impacts, the relative level of significance of those impacts, and the context within which they would occur.

Q-9

Population and Housing

To our knowledge, there is no CEQA guidance or requirement for that matter to analyze the displacement of people as an environmental impact. An analysis of such an impact is highly speculative in nature and lacks a clear connection with identifiable physical environmental impacts, the purpose and limit of CEQA analysis. Therefore, this section does not belong in the General Plan PEIR without appropriate guidance of if and how this issue should be addressed.

Q-10

Q-7 As stated in the PEIR, compliance with standards is required of all projects and is not considered to be mitigation. Therefore, the permit conditions would not be included as the framework for the mitigation. The GP PEIR references and describes the new permit but not the standards since it is anticipated that the standards will be updated throughout the life the General Plan. The reason the PEIR concludes that impacts are considered significant and unavoidable at this program level is that it cannot be said with certainty that adherence to water quality standards will completely eliminate significant water quality impacts in all cases. While not likely, it is possible that some future projects may require measures beyond water quality standards, and such measures would be considered mitigation. Until project details are known and appropriate mitigation applied, the potential for significant impacts remains unavoidable.

Q-8 The reference to "physically dividing communities" was taken from the City's Significance Determination Thresholds and is cited within CEQA's Guidelines for land use and planning impacts (Appendix G). In addition, CEQA Section 15131 (b) describes that the social effects of constructing a new freeway or rail line dividing a community would be the basis for determining that the physical effects of the construction may be significant.

Q-9 The City noise ordinance addresses permissible noise levels by land use type and time of day. The noise ordinance does not regulate transportation (vehicular, rail, or aircraft) noise. While the Mitigation Framework has the ability to provide noise attenuation for future uses and potentially limited amount of existing noise sensitive uses, it cannot provide mitigation for all existing noise sensitive uses that could be impacted by an increase in transportation noise. In addition, ministerial projects are not subject to CEQA and are not subject to mitigation measures. As the commenter has noted, individual projects may not be able to reduce noise impacts to below a level of significance, and such projects would be required to address the specific impacts, the relative level of significance of those impacts, and the context within which they would occur.

COMMENTS

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to below a level of significance, it must be concluded that at this program level of review, that future noise impacts are considered significant and unavoidable.

- Q-10 This topic is especially appropriate for an environmental document covering potential issues related to the development, redevelopment, or infrastructure expansion within the entire City of San Diego which has the potential to displace substantial numbers of people over time. However, the PEIR does not analyze the displacement of people as an environmental impact, and in fact, it states “The displacement of substantial numbers of people would occur over time, and may be considered a social and economic impact, but not a physical CEQA impact” (page 3.12-3, third paragraph). The focus of CEQA analysis is on physical changes to the environment. A significant impact could occur with the construction of replacement housing. See CEQA Guidelines Appendix G, which includes this topic as part of the initial study checklist.

Transportation/Traffic/Circulation/Parking

Q-11

The PEIR should address the Transnet extension (roads, freeways and transit), development impact fees, and public facilities financing plans as major components of the city's mitigation strategy for transportation, traffic, circulation, and parking. The PEIR should build off of the framework of these existing strategies rather than ignore them.

Page 2-50, Housing Element, Implementation Program

Q-12

The Housing Commission has an approximately \$250-million annual budget for affordable housing programs. This budget and the various affordable housing programs which the Housing Commission is responsible for implementing and which are discussed in detail in the Housing Element and integral to the city's affordable housing strategy should be discussed in this document in the context of facilitating affordable housing opportunities in conjunction with the implementation of the General Plan.

Global Warming

Q-13

Page 5-18: The PEIR states that there are no adopted federal plans or regulations addressing global warming. This is incorrect. The country's energy strategy, which includes the construction of new nuclear power plants, is a major part of the country's strategy toward reducing the impacts of global warming. The federal standards for fossil fuel power plants are also part of the strategy to reduce global warming. Funding of transit is yet another part of the strategy to reduce global warming.

Q-14

At the state level, the PEIR should discuss the governor's solar initiative and the process underway to develop green building standards. Water conservation plans, local and state funding and planning for transit, and environmental habitat preservation and restoration are also part of the strategy to reduce global warming. Global warming is largely a phenomenon of our existing approach to energy and transportation. *Population growth itself does not necessarily imply increases in GHG emissions, especially as our energy and transportation solutions change.* To be sure, the General Plan and the city are largely powerless to significantly reduce GHG emissions on a global scale. For that matter, GHG emissions will continue growing, or they may decrease or be eliminated entirely, completely independent of whether the city implements a new General Plan or not.

Q-15

Ironically, the city's failure to adequately accommodate new housing inside the city's boundaries has led to major housing growth outside the city and outside the county in Riverside and now Imperial County, which has dramatically increased GHG emissions in the San Diego Region and San Diego Air Basin as the city's workers commute in and out of the city. *Rather than being a potential source (indirect or otherwise) of increased GHG emissions, the city's General Plan Update is instead a comprehensive strategy to reduce future GHG emissions in the San Diego Region. The General Plan PEIR should not shy away from proclaiming this.*

Q-11

The PEIR states that, "Revenue sources for planned improvements are 'reasonably expected' to come from state, federal, Trans Net and local revenue sources." The transportation analysis included considered the roadways, freeways and transit improvements that have been added to the regional network due to the Transnet extension. As development occurs and community plans are updated, the infrastructure paid for by development impact fees, facilities benefit assessment fees and/or fair share contributions are used for the construction of the needed facilities. Development impact fees and facilities benefit assessment fees are components of the City's strategy for transportation improvements. However, they are existing City requirements, and their implementation is not considered to be mitigation. Fair share contributions may be considered mitigation to render a project's contribution to a significant cumulative impact to below a level of significance (CEQA Guidelines Section 15130(a)(3)).

Q-12

The PEIR Project Description has been revised to further describe the Housing Commission's role in implementing Housing Element programs.

Q-13

The City agrees that federal policies involving the construction of new nuclear power plants, standards for fossil fuel power plants, and funding for transit could, at least to some extent, reduce the amount of GHG emissions that cause global warming. According to the U.S. Environmental Protection Agency (EPA), "the United States government has established a comprehensive policy to address climate change" that includes slowing the growth of emissions; strengthening science, technology and institutions; and enhancing international cooperation. To implement this policy, "the Federal government is using voluntary and incentive-based programs to reduce emissions and has established programs to promote climate technology and science." The Federal government's goal is to reduce the greenhouse gas intensity (a measurement of greenhouse gas emissions per unit of economic

activity) of the American economy by 18 percent over the 10-year period from 2002 to 2012. In addition, EPA administers multiple programs that encourage voluntary GHG reductions, including ENERGY STAR, Climate Leaders, and Methane Voluntary Programs. Details about the government's climate policy are available at www.epa.gov/climatechange/policy/index.html.

- Q-14 The City agrees that the California Solar Initiative (CSI) (i.e., Million Solar Roofs Program) and the Green Buildings Initiative (Executive Order S-20-04) are important parts of the state level effort to combat global warming. As part of the CSI, the state has set a goal to create 3,000 megawatts of new solar-produced electricity by 2017 through the provision of incentives to existing commercial, industrial and agricultural properties and to both existing and new residential homes. The Green Building Initiative (GBI) sets a goal of reducing energy use in public and private buildings by 20 percent below 2003 levels by 2015. A brief description of each initiative has been added to Section 5.2 of the Final EIR.

The City also agrees that water conservation plans, local and state funding and planning for transit, and environmental habitat preservation and restoration are important components of a strategy to address GHG emissions and global warming impacts and has identified comprehensive policy guidance in the General Plan to reduce water consumed by future development; focus new development into mixed-use transit-supportive villages; and implement the City's Multiple Species Conservation Program (MSCP) Subarea Plan. Section 5.2 (page 5-18) of the DEIR explains that global warming is caused by increasing emissions of GHGs primarily associated with the burning of fossil fuels, deforestation, agricultural activity and the decomposition of solid waste. Although population growth does not necessarily imply increases in GHG emissions, Section 5.2 of the DEIR compares the existing level of GHG emissions within the City to projected levels in 2020 and 2030 under the General Plan and concludes that GHG emissions associated with population growth and development that occurs in accordance with the General Plan is expected to result in

COMMENTS

RESPONSES

increased emissions of GHGs, largely due to increased Vehicle Miles Traveled (VMT), as well as increased energy consumption and waste generation. The comment is correct that the efforts of the City, including implementation of the General Plan, cannot significantly reduce GHG emissions on a global scale. However, the City has determined that, under CEQA (Public Resources Code § 21083(b)), the incremental increase in GHG emissions associated with development that occurs in accordance with the Draft General would cause a cumulatively considerable incremental contribution to the significant cumulative (worldwide) impacts of global warming when viewed in connection with worldwide GHG emissions as stated in Section 5.2 of the DEIR.

- Q-15 The comment about the GHG emissions associated with inter-city and inter-county commuting is noted. A major policy of the General Plan is to focus future development in the City into walkable, mixed-use transit-supportive villages, which would increase opportunities for workers to live near their jobs and/or commute on public transit, bicycle, or foot. Although the comprehensive policy guidance of the General Plan and the implementation measures identified in the Action Plan would lessen the incremental increase in GHG emissions associated with future development, GHG emissions would still increase under implementation of the General Plan and cause a cumulatively significant impact under CEQA as discussed in the response to comment Q-14 and Section 5.2 of the DEIR.

COMMENTS

RESPONSES

Q-16

Thank you for this opportunity to comment on the Draft PEIR. We encourage the city to revise the PEIR so that it is consistent with MSCP/LDC EIR and to re-evaluate the impact analyses for many of the issue areas to take into account existing programs and regulations which will mitigate the impacts to below a level of significance.

Very truly yours,

Scott C. Molloy
Public Policy Advocate

Q-16 Staff believes that the General Plan EIR is not inconsistent with the MSCP and LDR environmental documents. Existing programs and regulations are acknowledged and cited throughout the document; however, adherence to these regulations and programs is mandatory, and is not considered mitigation. While it is expected that most future projects will either have no impacts or will be able to mitigate impacts to below a level of significance, it is highly likely that some projects will result in significant unmitigated impacts. Because it is not possible to foresee the details of future projects, it cannot be said with certainty that there is no potential for significant unmitigated impacts in any of the issue areas, and staff has therefore concluded that at this program level of review, future impacts must at this point be considered significant and unavoidable.

Environmental Health Coalition

COALICION de SALUD AMBIENTAL

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June 11, 2007

Marilyn Mirrasoul, Environmental Planner
City of San Diego Development Services Center
1222 First Ave., MS 501
San Diego, CA 92101

VIA: E-mail and Hand Delivery

Re: Project number 104495, San Diego General Plan Update Draft PEIR

Dear Ms. Mirrasoul,

Environmental Health Coalition (EHC) would like to submit the following comments on the City of San Diego's Draft Program Environmental Impact Report (DPEIR) for the General Plan Update. EHC is a 27-year-old community organization with over 3000 members working to promote environmental and social justice throughout San Diego.

EHC has been very supportive of key sections and policies in the draft General Plan Update (GPU) that promote environmental justice, protect environmental health and enhance sustainability. While the DPEIR for the GPU is strong in some ways, it fails in several areas. EHC's comments and concerns are detailed below. We first provide overall conclusions, followed by specific suggestions for the environmentally superior alternative, the analysis of the industrial collocation/conversion policy, the air quality analysis, the health and safety analysis and the population and housing analysis.

Overall Conclusions

First and foremost, CEQA guidelines sec. 15097(b) require that the EIR for a general plan contain a monitoring and reporting plan that includes policies and mitigation measures. The DPEIR contains an apparently unenforceable mitigation framework without specifying how policies and mitigation mentioned will be monitored and reported to the public. **In order to comply with CEQA and avoid impacts, the final PEIR must create a Mitigation Monitoring and Reporting Program (MMRP) listing what is contained in the current mitigation framework and the additional policies, mitigation measures and changes suggested in the remaining sections of this letter.**

R-1

R-1 See response to comment. B-1. Note that CEQA Section 15097 (c) states that, "The public agency may choose whether its program will monitor mitigation, report on mitigation or both."

R-2

Second, EHC strongly supports the clear statement that certification of this PEIR and the GPU will not authorize any specific development project (Executive Summary at 1.0-3 and Project Description at 2-3). We recognize that because of the scope and nature of the GPU, many future impacts cannot be specifically identified or mitigated in this PEIR. However, we are concerned that each area of environmental analysis concludes that the GPU will have significant and *unavoidable* impacts.

Certainly the implementation of the GPU will have significant impacts, but **the city can and must make every effort to ensure that impacts will be avoided to the maximum extent possible** through GPU policies, implementation of the environmentally superior alternative, future CEQA review of community plans and development projects, mitigations and other city programs. Impacts are not inherently unavoidable, and this PEIR should not allow future community plan updates and development projects to impose impacts because the program-level analysis has deemed them to be unavoidable. This must be clarified in the final PEIR and a new MMRP must specifically identify—and add, where necessary—GPU policies, program-level mitigations and other programs that will assure the public that impacts will be eliminated or avoided to the maximum extent possible.

R-3

Environmentally Superior Alternative

EHC supports the analysis of the Enhanced Sustainability alternative and strongly agrees that it represents the environmentally superior alternative. We believe that this alternative must be selected and implemented to ensure the best possible future for the city, its residents and the environment. In fact, EHC recommends specific changes to the GPU and the PEIR in order to implement and enhance the superior alternative.

R-4

Even if this alternative is not enacted, the PEIR must specifically and aggressively address and mitigate the global warming contributions of the development to be allowed under the GPU. Such requirements were recently outlined in a May 8, 2007 letter Attorney General Edmund G. Brown sent in response to a single refinery expansion project. The letter states:

Because any increase in emission will make it more difficult for the State to achieve the greenhouse gas reductions required by Assembly Bill 32... the PEIR must evaluate global warming impacts and discuss feasible alternatives and mitigation measures to avoid or reduce those impacts.¹

R-5

The primary vehicle for accomplishing this mandate to reduce greenhouse gas and global warming impacts would be the creation of an **Energy Element** within the GPU. The California Energy Commission (CEC) has recommended that, as part of AB32, local

¹ Letter from Attorney General's Office to Muriel Parker, Contra Costa County Planning Commission, Comments on the ConocoPhillips Rodeo Refinery Expansion Project and Final Environmental Impact Report (File # LP052048), May 8, 2007.

R-2 &
R-3

As stated in the PEIR, no specific projects would be authorized by the adoption of the General Plan. Subsequent projects, including community plan updates, would be required to undergo separate environmental review, and all feasible mitigation measures would be required per CEQA Section 15126.4.

R-4

As discussed in the response to comment B-1, the City has incorporated the revised policy language of the General Plan to establish comprehensive policies to reduce GHG emissions and has incorporated them into the MMRP to ensure they are imposed on future development. Pursuant to CEQA Guidelines §15097(b), “(t)he monitoring plan (for a general plan) may consist of policies included in (the) plan-level document”. As also described in the response to comment B-1, the General Plan Action Plan identifies measures to implement the policies of the General Plan, including the policies that reduce GHG emissions associated with future development.

R-5

The City acknowledges that the California Energy Commission (CEC) has recommended in the 2006 Integrated Energy Policy Report that the state legislature require local governments to include an energy element in their general plans. As of this writing, the state legislature has not adopted legislation requiring local governments to include an energy element in their general plans. Although the General Plan does not include an energy element, the Conservation Element, Section I, Sustainable Energy, addresses energy issues. The City agrees with the comment that many of the Conservation Element policies could make up the core of an energy element, such as policies that improve energy efficiency in the transportation sector and in buildings and appliances, employ sustainable or “green” building techniques and self-generation of energy using renewable energy sources, and minimize energy use through site design, building orientation, and tree-planting. However, the creation of a new energy element

governments be required to include Energy Elements in their General Plans.² Many of the energy and sustainability-related policies contained in the GPU's current Conservation Element could make up the core of an Energy Element, with additional and enhanced policies to implement the environmentally superior alternative.

R-6

Specifically, renewable energy policies and building construction standards should be added and enhanced, and subsequently reflected in the final PEIR's MMRP. In the 2007 Update of the Integrated Energy Policy Report (IEPR), the CEC focused on two issues: 1) progress of meeting the state requirement to generate 20% of the state's electricity with renewable energy and 2) clean energy development and energy saving opportunities arising from sustainable land use planning.³ Several suggestions in this vein are contained in the memo EHC sent to the city's GPU team dated May 21, 2007.

R-7

Additionally, the GPU Energy Element should create new policies requiring all new construction and redevelopment to meet new, higher energy efficiency standards and to require a percentage of buildings within a given construction project to use solar technologies for some percentage of its demand. At a minimum, all building should be required to meet its own peak demand on-site. Standards should be comprehensive and based on Architecture 2030 goals already adopted by the AIA and the Mayor's UN conference and existing green building standards.

Such standards would make the city compliant with state direction on climate change. In addition to the direction noted above, the CEC has stated that decreasing fuel use alone will not be enough to meet greenhouse gas emission targets and that development strategies such as increasing on-site solar, distributed generations, and energy efficiency in design would produce significant energy savings.⁴ Likewise, the California Public Utilities Commission (CPUC) is expecting to promote construction of "net-zero energy" buildings that use solar cells and other technologies. The CPUC is targeting buildings because they account for 40 percent of the state's electricity use.⁵

Industrial Collocation/Conversion policy

EHC is very pleased to see that the collocation policy is referenced specifically as a General Plan component that will reduce air quality, health and safety and land use impacts. It is entirely appropriate that this policy is referenced as mitigation, and should continue as a key component of the MMRP that must be developed for the final PEIR. This approach should be a model for other GPU policies that will or could reduce impacts. However, there are a few areas where the analysis of the collocation policy must be enhanced.

² IEPR Update, CEC, January 2007, p. 94

³ IEPR, CEC, January 2007, p. E-1.

⁴ IEPR Update, p. 73

⁵ California leads energy efficiency, Tri-Herald Tribune, Ian Hoffman, 06/16/2007

would not make energy-related policies have more influence than they would have as a part of the Conservation Element. The General Plan is a comprehensive document covering many subject areas. The elements, or chapters, organize the subject areas. Per state law, all General Plan elements have equal legal status; no one element is subordinate to another. The Conservation Element policies, and other policies of the General Plan previously discussed in the response to comment B-1, such as policies addressing recycling in all residential and non-residential buildings and promoting water conservation and reducing water-related energy consumption, would result in enhanced sustainability measures discussed in the enhanced sustainability alternative on future development.

R-6 See response to comment B-1.

R-7 See response to comment R-4. In addition, the Conservation Element introduction has been edited to include a table which lists climate change issues by subject area. A list of policies related to energy efficiency is provided on this table. Refer to Conservation Element Sections A, F and I, and Urban Design Section A for policies which promote energy efficient design and development.

COMMENTS

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1. As discussed below, the existing conditions sections do not provide a level of detail that allows communities to assess the true potential impacts of GPU implementation. The generally comprehensive discussion of the collocation policy in various parts of the DPEIR should be enhanced by adding detail to the existing conditions text of at least the air quality, health and safety and land use sections. Descriptions of the current impacts in communities where industries and other pollution or hazardous materials sources are mixed with or in close proximity to sensitive receptors will greatly increase the public's understanding of the benefits of the collocation policy.
2. One major qualm that EHC has had about the collocation policy is that it does not address industrial facilities being sited near sensitive receptor uses, or adjacency of industrial and non-industrial zones. We are therefore delighted to see that the proposed mitigation for health and safety includes the use of the collocation/conversion suitability factors for future decisions around the siting of nonresidential employment uses. However, in order to fully protect public health, similar language must be incorporated into the mitigations for air quality. Mitigations under land use should also reference this strategy in developing future zoning under community plan updates.

Specifically, the final air quality MMRP should be amended to include the following language:

- Development that could significantly impact air quality, either individually or cumulatively, would be evaluated using the collocation/conversion suitability factors, and would receive entitlement only if conditioned with all reasonable mitigation to avoid, minimize or offset the impact. The city would evaluate the project using the collocation/conversion suitability factors to analyze specific proposals.

- Future projects locating non-residential employment uses in proximity to residential development or locating residential development in proximity to non-residential air pollution sources including industries, freeways, major roadways or heavily congested intersections must be sited and designed in a manner that reduces or avoids potential impacts on sensitive receptors.

- As part of the evaluation process for a project or community plan update, the city will require appropriate buffering of sensitive receptors from air pollution sources through the use of open space, zoning or other separation techniques.

Air Quality Analysis

R-8

R-9

R-10

R-11

- R-8 The existing conditions section of the DPEIR adequately identifies conditions on a citywide basis for a policy document such as the General Plan. A more detailed level of analysis of existing conditions as you described may be more appropriate at a community plan or project level environmental analysis. The absence of a more detailed existing conditions section does not affect the adequacy of the DPEIR, since adding it only reinforces the need for the mitigation stated in the document.

The new policy will require that potential land use incompatibilities that could result in health risks be analyzed as part of the community plan update or amendment process, and that adequate distance separation be provided between sensitive receptor land use designations and potential sources of hazardous emissions such as freeways, industrial operations, or port facilities (see LU-I.14).

- R-9 The City has considered this comment and has proposed edits to select policies in the General Plan to address the issues raised by this comment. Relevant policies are also included in the MMRP for the General Plan and will be further refined in the Action Plan. These revisions do not substantially change the content or conclusion of the PEIR.
- R-10 See response to comment R-9.
- R-11 See response to comment R-9.

COMMENTS

RESPONSES

The Air Quality section of the DPEIR has several flaws that must be corrected in the final PEIR.

1. This section does not adequately describe existing conditions and potential impacts because it analyzes air quality only at the regional level. As stated in EHC's PEIR scoping letter dated 10/2/2006, the document must accurately represent current conditions and potential impacts in San Diego's different communities. The city's different communities are not impacted equally by air pollution as is suggested by the regional level of analysis. In fact, some communities bear a significantly disproportionate burden of air pollution currently and will experience the impacts of the GPU's implementation differently from other communities.

R-12

An adequate analysis can be achieved by adding to the section describing "Specific Air Pollutants." The introduction to this section mentions the three air monitoring stations that are located within the city. This should be followed by a review of data from the different stations to paint a picture, at least at a sub-regional level, of how different areas of the city are impacted by pollution. Incidentally, the monitoring station listed as being at 12th Avenue downtown was moved to Perkins Elementary School in 2005 and is now located at the corner of Main Street and Sigsbee Street in Barrio Logan. This should be corrected in the final PEIR. A more detailed discussion of sources of each specific pollutant and which communities have a greater concentration of these sources and pollutants should then be included in the subsequent subsections.

R-13

2. In section 3.2.3, in discussion of the first threshold of significance, the DPEIR states that "Encouraging and creating incentives for energy-efficient design in new developments and promoting the reduction of industrial emissions through use of least-polluting cost-effective processes and technologies will benefit the region's air quality." This is cited along with other policies and programs discussed previously as insurance that the GPU will not conflict with the Air Quality Management Plan. However, no specific GPU policies are noted to back up this claim. While the GPU contains policies encouraging energy-efficient design that should be noted, it does not contain policies promoting least-polluting technologies for industry. Either this claim should be removed, or, preferably, the GPU should add policies to encourage reduction of industrial emissions and use of least-polluting technologies and cite them specifically in this section of the final PEIR and the MMRP.

R-14

3. Also in section 3.2.3, the DPEIR identifies industrial and non-industrial mixed use and congestion at large intersections as two causes of impacts on sensitive receptors that go beyond the second threshold of significance. These are certainly not the only causes of significant impacts, and one cause erroneously absent is freeways and major roadways. Many studies over the past decade have overwhelmingly shown that current levels of air pollution associated with traffic on freeways and major roadways have significant and unacceptable health

R-15

R-12 The comment is correct that local air quality conditions may be greater than regional levels of certain pollutants. This is caused by the types of land uses and traffic conditions in these communities. See response to comment R-13.

R-13 In reply to the request to compare air quality results from each of the City's monitoring locations, data for the last three years at stations within the City and also from Chula Vista were reviewed. Reviewed were two existing locations in Downtown (Union Street) and also at Barrio Logan (1110 Beardsley Street), which began operation in early 2005, and one former East Village location (12th Avenue) that operated in 2004 and early 2005, Overland Avenue in Kearny Mesa, and Otay Mesa-Paseo International. The results for the three-year periods were as follows

- Daily Maximum 8-hour Carbon Monoxide Averages. No exceedances of National or State Standard.
- Daily PM10 Measurements. Beardsley Street – five exceedances of State Standard in 2005 and 11 in 2006; no exceedance of National Standard. 12th Avenue – nine exceedances of State Standard in 2004 and one in 2005; no exceedance of National Standard. Otay Mesa – 30 exceedances of State Standard in 2004, 29 in 2005, and 27 in 2006. Overland Avenue – No exceedances of State or National Standard. Chula Vista – two exceedances of State Standard in 2005 and 2006; no exceedance of National Standard.
- Daily Maximum Hourly Nitrogen Dioxide Measurements. No exceedances of State Standard; no National Standard specified.
- Daily Maximum 24-Hour Sulfur Dioxide Averages. No exceedances of State or National Standard.

R-14 The City does not have the jurisdiction or expertise to regulate stationary sources of air pollutants, given the various types of pollutants and the technical knowledge required to determine "least-polluting cost-effective technologies." Instead, a more practical approach is to require sufficient separation of known or

COMMENTS

RESPONSES

potential emission sources from residential and other sensitive receptor uses as addressed in the response to Comment R-8. A new Policy LU-I.14 has been added to the Environmental Justice section of the Land Use and Community Planning Element to state that potential land use incompatibilities that could result in air quality health risks be analyzed as part of the community plan update or amendment process and that adequate distance separation be provided between sensitive receptors and potential stationary and mobile sources of hazardous emissions.

R-15 See response to comment R-8.

COMMENTS

RESPONSES

impacts on sensitive receptors within up to 1500 feet. As in the case of large intersections, the GPU will likely increase these impacts and create or exacerbate another kind of "hot spot" around certain routes or sections of freeway.

R-16

The final PEIR not only must add this kind of information on freeways, but must provide reference to policies in the GPU and add to the MMRP in order to avoid or minimize the impacts. EHC has suggested additional language for policy LU-I.14 (as presented in our May 21, 2007 memo to the city's GPU team) that would promote the creation of separation distances around freeways and other sources of air pollution and hazardous substances. This language must be adopted and referenced in the final PEIR.

4. Additionally, the MMRP should be revised as suggested in the above comments on the collocation policy to protect sensitive receptors from air pollution sources, including freeways and major roadways.

R-17

Health and Safety Analysis

The Health and Safety section of the DPEIR also needs additional detail in order to adequately prove its conclusions to the public. In general, this pertains to policies mentioned but not specifically identified or explained. The following are three examples that must be remedied in the final PEIR:

1. In section 3.5.3, under the first threshold of significance, the text references existing city policies and regulations and additional policies in the GPU that will minimize hazardous materials impacts. These policies must be identified and described in a manner that makes it clear to the reader that they will indeed have the stated effect. They must also be included in the MMRP as mitigations.

R-18

2. The same section two paragraphs down claims in reference to zoning that existing and future regulations will reduce land use incompatibilities associated with hazardous materials sources. Again, these regulations must be described in more detail and added to the MMRP to adequately make the case that they will reduce incompatibilities.

R-19

3. Finally, the mitigation framework states that "goals, policies and recommendations enacted by the City" combined with other regulations provide the framework for adequately evaluating future projects. Since many of those goals, policies and recommendations are not specified here or in the preceding text, the public has no basis for trusting the evaluation framework as it stands.

R-20

As mentioned above, EHC supports the mitigation addressing the siting of non-residential employment uses. However, it must be enhanced in a similar manner to the air quality section in order to adequately protect public health and safety. The following point should be added to the final MMRP:

R-16 See response to comment R-8.

R-17 City staff has considered the health risk comments provided and has proposed revisions to the Environmental Justice-Environmental Protection section of the Land Use and Community Planning Element. Additional revisions will be made to action plans and the MMRP to ensure implementation of Policy LU-I.14.

R-18 See response to comment R-9.

R-19 See response to comment R-9.

R-20 See response to comment R-9.

R-21

- As part of the evaluation process for a project or community plan update, the city will require appropriate buffering of sensitive receptors from sources of hazardous materials through the use of open space, zoning or other separation techniques.

Population and Housing Analysis

As in other analyses, this section claims that review of future projects for consistency with General Plan policies will help to minimize displacement impacts from future projects. Particularly since displacement is not considered to be an impact under CEQA, the summary of GPU balanced community and equitable development policies is not sufficient to convince the public that these policies will work. However, new draft language has been proposed that would help to affirm this claim and should be reflected in the final PEIR and included as mitigation in the MMRP. Specifically, Land Use Element policy LU-H.1 has been improved (per language proposed by city staff also contained in EHC's May 21, 2007 memo) to encourage new development based on community needs and the provision of affordable housing to offset the displacement of community residents.

R-22

Thank you for the opportunity to comment on the Draft PEIR. Please contact me or Paula Forbis at (619) 474-0220 x107 should you have any questions regarding EHC's comments.

Sincerely,



Laura M. Benson
 Director, Toxic Free Neighborhoods Campaign

CC: Councilmember Ben Hueso
 Nancy Bragado, Program Manager
 Jean Cameron, Senior Planner

R-21 See response to comment R-8.

R-22 Comment noted. Section 3.12.3 (Population and Housing, Impact Analysis) of the PEIR has been revised to reflect the revision to Policy LU-H.1 in the Land Use and Community Planning Element.



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June 25, 2007

Re: Comments and Recommendations Regarding the City of San Diego General Plan Conservation Element and related General Plan DEIR

Dear Marilyn,

Thank you for this opportunity to comment on the City of San Diego General Plan. Below are comments and recommendations as they relate to the DEIR, and following that, specific goals and edits to the policies that should be incorporated into the General Plan Conservation Element and Public Facilities Element to ensure that our City's natural resources will be conserved, restored and protected.

COMMENTS AND RECOMMENDATIONS
 for the
 CITY OF SAN DIEGO GENERAL PLAN UPDATE
 DRAFT ENVIRONMENTAL IMPACT REPORT (DEIR)

Table 1.0-1 Summary Table of Significant Impacts and Mitigation Framework to Reduce Effects:

Section 3.3 Biological Resources

Impacts to freshwater stream invertebrates have not been addressed. The San Diego Regional Water Quality Control Board requires biological assessment monitoring reports in NPDES storm water permits, NPDES live stream discharges, and waste discharge requirements permits¹. This information is also useful to evaluate the best management practices used to mitigate impaired water bodies.² The report by Isham³ shows that benthic invertebrates in urbanized streams of San Diego County are in poor condition.

S-1

¹ San Diego Regional Water Quality Control Board, *Ambient Biological Assessment Monitoring Program for Inland Surface Water* <http://www.waterboards.ca.gov/sandiego/programs/bioassessment.html>

² Gibson, Dave, *Bioassessment and Biocriteria for Natural Resource Managers and Citizen Monitoring Groups* <http://www.waterboards.ca.gov/sandiego/programs/bioassess/1%20bioassessment%20training%20presentation%2009-27-10.pdf>

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<http://sandiego.sierraclub.org>



S-1 No specific projects or actions have been identified with the Draft General Plan that would result in any direct or indirect physical change in the environment. Biological Assessments which are a part of the City's NPDES storm water permit are prepared annually and submitted to the Regional Water Quality Control Board (RWQCB) as part of the City's Annual Report. Future development and redevelopment projects associated with the implementation of the General Plan would be subject to the City's Storm Water Standards. Projects which have the potential to impact downstream resources, which includes freshwater stream invertebrates, would be analyzed on a case-by-case basis, and may entail the preparation of a Biological Assessment or Biological Technical Report. These reports would analyze the effects of development at the project level and information would be disclosed within the appropriate CEQA document.

Section 3.7 Hydrology

Enforce provisions of the Municipal Separate Storm Sewer Systems Permit, R9-2007-0001 (MS4)¹ to prevent erosion and sediment pollution of streams and rivers. This latest permit contains modifications to the Jurisdictional Urban Runoff Management Plan and Watershed Urban Management Plan and a new Regional Watershed Management Plan to reduce discharges of pollutants in urban runoff to the maximum extent practicable and achieve water quality standards.

S-2

Section 3.14 Public Utilities

Mitigation measures:

S-3

- Upgrade Pt. Loma Wastewater Treatment Plant from advanced primary to secondary treatment.

S-4

- Reduce flow of wastewater discharge into the ocean and thereby reduce impacts to the marine environment by implementing wastewater recycling recommendations in the City Water Reuse Study² for non-potable reuse and indirect potable reuse (reservoir augmentation).

S-5

- Offset the need to import additional water and seawater desalination through water conservation and plus water recycling recommendations in the Water Reuse Study. The combined recycling capacity of the North City and South Bay Water Reclamation Plants is 45 million gallons per day (MGD) of tertiary treated water. The market for tertiary treated water (non-potable) is primarily irrigation and is seasonal. The Water Reuse Study shows that a combination of non-potable and indirect potable reuse more fully uses the capacity of these reclamation plants. Using a conservative combination of 30 MGD would provide 30,400 acre-feet (AF) per year. Adding the City water conservation plan water of 46,000 AF in year 2030 provides 76,400 AF.

Section 3.17 Water Quality

3.17.1 Existing Conditions. Table 3.17-1 lists the 303(d) impaired water bodies. However, the DEJR does not discuss the Total Maximum Daily Load (TMDL) programs that are being implemented or will be in the near future and their impacts on the General Plan.

S-6

Mitigation measures:

¹ Isham, Bill, *Freshwater Stream Invertebrates: Response to Water Quality Impairment and Physical Habitat Alteration*, Technical Paper # 0508, Weston Solutions, Inc.

http://www.westonsolutions.com/about/news_pubs/tech_papers/0508_Isham_Freshwater.pdf

² San Diego Regional Water Quality Control Board (1), San Diego County Municipal Storm Water Permit http://www.waterboards.ca.gov/sandiego/programs/sd_stormwater.html approved Jan 24, 2007

³ City of San Diego Water Reuse Study Final Draft Report March 2006. <http://www.sandiego.gov/water/waterreustudy/irrvolvement/02006.shtml>

S-2 The City enforces the Municipal Separate Storm Sewer Systems Permit as required by law. See the Regulatory Setting the Water Quality section, pages 3.17-3 through 3.17-4, for a description of the applicable federal, state and local laws related to this subject.

S-3 From a General Plan policy perspective, this measure is premature; the City has not made a decision regarding the future of the Point Loma Wastewater Treatment Plant. The Point Loma plant currently operates at an Advanced Primary Treatment level as allowed by the Environmental Protection Agency. By December of this year, the City will decide whether to pursue a continuation of its agreement with the EPA or forgo that legally permissible opportunity and instead voluntarily begin upgrading the Point Loma plant to a Secondary Treatment level. Mayor Sanders has convened a scientific panel to help him determine whether or not ratepayers and the environment are better served by maintaining the current treatment protocols or by changing the wastewater treatment protocols.

S-4 The City of San Diego currently provides recycled water to nearly 400 retail meter connections and three wholesale connections including the city of Poway, the Olivenhain Municipal Water District and the Otay Water District. The average daily beneficial reuse is currently ten million gallons per day. Due to budget constraints the program has limited resources to expand beyond the current distribution system configuration. Thus marketing efforts are targeting in-fill customers that are located close to existing distribution lines and are currently using potable water for non-potable purposes (irrigation, industrial processes and commercial cooling towers). Implementation of the recommendations outlined in the Water Reuse Study requires further analysis and outreach efforts with citizens and stakeholder groups. It is anticipated that said analysis and outreach will be conducted over the next 2-3 years in an effort to determine the optimal alternatives and strategies.

S-5 The City of San Diego's Water Conservation Program reduces

COMMENTS

RESPONSES

water demand through promoting or providing incentives for the installation of hardware that provides permanent water savings, and by providing services and information to help San Diegans become more knowledgeable about the reasons they should reduce their water use and the ways they can do it.

- S-6 Comment noted. The TMDL regulations are subject to ongoing review by the Water Quality Control Board and will change over time. The current and the pending regulations can be found at <http://www.waterboards.ca.gov/sandiego/tmdls/tmdl.html>.

COMMENTS

RESPONSES

S-7

- Pollution prevention should be highest priority. Identify potential sources of pollutants and enforce discharge permits to prevent pollutants from entering the surface and ground water resources.
- Develop and implement integrated pest management (IPM) for City owned landscaping and
- Promote IPM for general public and landscaping contractors
- Require low impact development⁶ (LID)
- Implement and enforce MS4 including erosion control methods
- Address emerging pollutants of concern⁷ including endocrine disruptors that can enter waste water and potable water supplies. Assess their environmental and human health impacts and mitigation measures to reduce effects

S-8

Energy. The DEIR fails to address potentially significant energy impacts and mitigation framework to reduce energy as required in CEQA⁸.

COMMENTS AND RECOMMENDATIONS
for the
CITY OF SAN DIEGO GENERAL PLAN UPDATE
CONSERVATION ELEMENT

and
PUBLIC FACILITIES, SERVICES AND SAFETY ELEMENT

The following policy recommendations and improvements for the Conservation Element would help reduce the project impacts identified in the DEIR as well as reduce impacts that are not identified in the DEIR.

NOTE: New, recommended policy language is underlined.

Minor edits of City-proposed policies use standard edit annotation such as ~~struck through~~ and alternate recommended language is both **bolded and italicized**.

Sustainable Development

S-9

1) RECOMMENDATION: Page CE-7, policy CE-A.8.f. Please add the ***bold/italicized*** wording as follows: *Incorporate existing mature trees and native vegetation into site designs.*

S-10

2) RECOMMENDATION: Page CE-7, policy CE-A.8. Add a policy stating: Use native, drought-tolerant plants that reduce the need for pruning thereby reducing green waste loads on

⁶ USEPA Low Impact Development Page <http://www.epa.gov/lpd/pdf>

⁷ Daughion, Christian, *Non-regulated Water Contaminants: emerging research*, Environmental Assessment Review 24(2004) 711-732 <http://www.epa.gov/esd/chemistry/pharm/images/EIAR.pdf>

⁸ California Resources Agency http://crra.ca.gov/topic/env_law/ceqa/guidelines/pdf/nppn_f.pdf CEQA Guidelines Appendix F Energy Conservation

S-7

It should be noted that adherence to and enforcement of existing regulations is a legal requirement and, therefore, is not considered CEQA mitigation.

S-8

Energy impacts are addressed under Public Utilities in Section 3.14.3 of the PEIR, which states that “implementation of the Plan has the potential to result in impacts to energy supply due to the planned growth and the potential for additional growth that could occur from subsequent community plan updates.” The City provides an energy conservation program in the Environmental Services Department and is taking a leadership role in efforts to conserve energy and reduce greenhouse gas emissions. The Environmental Services Department also provides consultation within and outside the City on energy conservation and sustainability, and provides incentives for sustainable projects under the City Council’s Sustainable Building Policy 900-14. The Sustainable Buildings Expedite Program provides expedited permit processing for sustainable buildings that would utilize alternative energy resources and technologies such as photo voltaics to generate up to 100 percent of the electricity needed by the building and its occupants. The PEIR energy impact analysis concluded that “General Plan policies and City programs would aid in reducing adverse energy impacts, but the projected population growth in the City would result in an increased demand for energy.” Potential construction and other impacts for development of new energy sources are not known at this PEIR level of analysis and, therefore, there remains a potential for significant unavoidable impacts.

Note: Comments S-9 through S-46 do not address this environmental document. Rather they are recommendations for revisions to the General Plan. While no response to these comments is required by CEQA, staff has provided the following information as a courtesy.

COMMENTS

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S-9 If this recommendation is intended as a mitigation measure for energy impacts, it is not clear why it is necessary to landscape specifically with native species to reduce energy consumption. Any drought-tolerant landscaping (which can include both of the above) reduces water consumption, which does reduce the amount of energy for water transportation. This measure is one that can be used, as appropriate, to mitigate project-specific impacts in subsequent environmental documents.

In general it is recommended that native species and drought tolerant plants be used in landscape design. This reduces the need and/or amount of irrigation required. There are potential conflicts with regard to fire fuel load and the use of irrigation. Zone One brush management areas are required to be irrigated and non-flammable vegetation which seems to preclude the use of many natives. Additionally, allowing owners (or multiple adjacent owners) to plant large areas with natives could result in creating fire fuel areas.

S-10 Pruning of plant materials will continue to occur as required in both Zone 1 & 2 brush management zones.

As this measure applies to potential project impacts for development under the proposed General Plan, it has a tentative connection to several issue areas. Native, drought tolerant landscaping does often reduce the amount of green waste generated and is sometimes an appropriate measure to reduce solid waste. However, another approach would be to address the issue from a "Right Plant, Right Place" angle. If designers chose plants that would normally grow to the mature expected height there would be less need to prune so heavily. For example, don't plant a five-foot-high plant that must be trimmed to keep it 30-inches high or select a tree that grows to 30 feet and expect to trim it to keep it at a height of 15 feet.

Green waste is sometimes composted onsite, other times it is collected for use in the City's composting operation, but sometimes it ends up in the mixed waste stream. Producing less

COMMENTS

RESPONSES

yard waste may potentially produce less traffic in transporting it, and also less material that inadvertently ends up in landfills. Traffic and landfills consume fuel, thus this measure has a very distant relationship to energy consumption. However, reducing traffic can be better accomplished by way of the growth patterns the General Plan is proposing.

COMMENTS

RESPONSES

the landfills and composting facilities. This also reduces the energy required for priming and processing the green waste for composting.

S-11 3) RECOMMENDATION: Page CE-7. Add a policy stating: Minimize or eliminate building materials that contain toxic substances such as zinc and copper, which through normal wear can enter the storm water system and pollute the surface waters.

Open Space and Landform Preservation

4) Page CE-9. The first paragraph states that *"The City's Environmentally Sensitive Lands (ESL) regulations help protect, preserve, and restore lands containing steep hillsides..."*

This is unfortunately only partially true. With increasing frequency, citizens are started to see development occurring on the steep slopes of the canyons and they wonder what happened to intended protections of the Hillside Review Ordinance and Hillside Protection Overlay zone. The answer is that these protections were eliminated during the 2000 Code update and replaced with the current "steep hillside" definition. This definition has a loophole that is allowing unnecessary destruction of steep hillsides in places where they have contributed to our unique land form and quality of life for centuries. This is due to minor incidental disturbance of the steep slopes that occurred years ago when building pads were graded for surrounding development above the slopes. These steep hillsides are now being encroached upon with expanded development, and the encroachment is being permitted because there is a shallow layer of fill dirt lying on top of the steep slopes and the gradient is not considered "natural"... despite the fact that their current gradient is still steep by definition and, for all practical purposes, the same as it had been for centuries. The definition reads:

"Steep hillsides means all lands that have a slope with a natural gradient of 25 percent (4 feet of horizontal distance for every 1 foot of vertical distance) or greater and a minimum elevation differential of 50 feet, or a natural gradient of 200 percent (1 foot of horizontal distance for every 2 feet of vertical distance) or greater and a minimum elevation differential of 10 feet.

About 3-4 years ago the City's Natural Resources and Culture Committee directed staff to make recommendations to resolve this definition problem. The environmental community recommended a simple fix of the definition but staff embarked on a time-consuming mapping solution that has been shelved for some time due to other priorities, we are told.

S-13 RECOMMENDATION: Page CE-9, please add a policy to: "Amend the ESL steep hillside definition to protect steep hillsides that still have the qualifying steep gradient, (greater than 25% slope etc.), despite incidental impacts from surrounding development (such as a layer of fill dirt on top of the steep hillsides)." This could be an interim step while any labor-intensive mapping solution is developed by staff over the coming years.

S-14 5) RECOMMENDATION: Page CE-11, policy CE-B.4. Please add: "During redevelopment, provide incentives for increased storm water retention on site, beyond the minimum requirement, to reduce the amount of erosive runoff flowing through the canyons."

S-11 Using less toxic substances not only helps with runoff issues, as the commenter mentions, it also makes disposal of left over and demolition materials less problematic. The City's Miramar Landfill currently accepts certain materials, such as non-friable asbestos, but other materials cannot be accepted at Miramar, and instead must be transported to more distant hazardous waste landfills. The content of consumer products is not something that is usually under the control of individual developers. Where there is a choice, appropriate materials are encouraged. The more effective strategy, however, is appropriate regulation of manufacturing facilities, requiring safer products through state and federal legislation.

S-12 Preparation and adoption of the Land Development Code (effective date 2000), was based upon extensive public participation consensus in both the drafting of the regulations and the public hearing process. Development of the Environmentally Sensitive Lands Ordinance (ESL) was an important component of that multi year effort and every effort was made to draft language to ensure protection of the overall quality of environmentally sensitive lands, including its natural and topographic character.

S-13 City staff has recommended that amendments to ESL to revise the steep slopes definition be addressed more specifically at the community plan level as part of the community plan update program currently in process.

S-14 The General Plan is an overall policy document and does not list all of the measures employed or to be employed by the City to manage storm water impacts. It is anticipated that additional incentives and programs such as that suggested will be incorporated as part of the City's Storm Water Program in the future.

COMMENTS

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6) Page CE-8 states: "1972 – the City amended the charter to establish the Environmental Growth Fund, two thirds of which could be used as debt service for bond issuance to acquire, improve, and maintain open space for park or recreational purposes."

S-15

RECOMMENDATION: Under policies CE-B.1, please add a policy stating: "Use the Environmental Growth Fund to conduct research and develop plans and implement methods to reduce erosion and invasive plant species in canyons and other natural habitats, and otherwise help maintain natural habitats."

7) Page CE-9, policy CE-B.1, states: "*Protect and conserve the landforms and open spaces that define the City's urban form; provide public views/vistas; serve as core biological areas and wildlife linkages; are wetlands habitats; provide buffers within and between communities, or provide outdoor recreational opportunities.*"

We find that many impacts to open space habitat areas are not properly restored to functional native habitat and that the City's restoration guidelines lack criteria that establish a certain level of performance for restoration practices.

S-16

RECOMMENDATION: Add a policy to: "Amend the restoration standards to include determination of success criteria."

8) Page CE-9, policy CE-B. We also find that the current policy that recommends "native or drought tolerant" vegetation allows a large loss of native habitat, as natural areas are graded and then replanted with vegetation that has little habitat value for local animals. San Diego County currently has several native plant nurseries, and sourcing the material for large re-vegetation projects is not as difficult as before.

S-17

RECOMMENDATION: Add a policy: "Mitigation for project impacts require the re-vegetation of temporarily impacted, graded areas with the original native vegetation."

S-18

9) RECOMMENDATION: Page CE-9, policy CE-B.1.c. Please add the following underlined sentence to precede the City's proposed policy, so that it is amended to read: "Protect and conserve city-owned canyon lands. Protect community urban canyons and other important open spaces that have been designated in community plans for the many conservation benefits they offer locally, and regionally as part of a collective citywide open space system....."

10) Page CE-11, policy CE-B.1.d. states: "*Minimize or avoid impacts to canyons and other environmentally sensitive lands, by relocating sewer infrastructure out of these areas where possible, minimizing construction of new sewer access roads into these areas, and redirection of sewage discharge away from canyons and other environmentally sensitive lands.*"

In the 4-5 years of implementing the recommendations of the Canyon-Sewer Maintenance Task Force (adopted 2002), very few sewer lines have been recommended for relocation out of canyons. Permanent access roads through the canyons have been recommended in areas where the existing roads have removed rooted vegetation and destabilized the creek beds, and massive erosion of canyon floors has ensued. The narrow strips of riparian woodland/wetlands in the

- S-15 The Environmental Growth Fund has stipulations as to how these funds may be used. Policy CE-B.1a., has been revised to read "Utilize Environmental Growth Funds and pursue additional funding for the acquisition....."
- S-16 Success criteria are required as part of project level restoration plans; and the determination of achievement is made based upon habitat type in coordination with the City's Mitigation Monitoring and Coordination Section (MMC), Environmental Analysis Section (EAS), and the wildlife resource agencies. At the program level, it is not appropriate or feasible to articulate a specific quantitative or numeric performance standard.
- S-17 Mitigation consisting of re-vegetation for impacts to habitat requires the submittal of a restoration plan to be reviewed and approved by EAS and, in most cases, Multiple Species Conservation Program (MSCP) staff. The City's Biological Resource Guidelines require that habitat revegetation consist of equal or better habitat than that impacted. A no net loss of habitat would result with the implementation of these City guidelines.
- S-18 Policy CE-B.1c addresses both City fee-owned open space and private property that has been conserved in easements for open space purposes or is community plan designated open space. Protection and conservation of City fee-owned canyons is accomplished through dedication as identified in Policy CE-B.1f. To add the proposed language would put limits on this policy and not include all types of open space lands.

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floors of our canyons are critically important for species conservation, flood and erosion control, and water and air filtration. This narrow corridor of important green-infrastructure cannot deliver all these values and accommodate the sewer and storm water flows of the city, and the access roads right along the streams all at the same time.

S-19 RECOMMENDATION: Please add: "Amend the criteria and financial formula for the decision-making process when considering permanent sewer access roads in order to increase the level of redirection of sewer flows out of the canyons."

S-20 11) RECOMMENDATION: Page CE-11, policy CE-B.1.c. Please edit as follows:
"Encourage *Develop and implement plans for the removal of invasive plant species and the planting of native plants near open space preserves.*"

12) Page CE-11, policy CE-B.2. reads: "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."

S-21 RECOMMENDATION: Please add: "Where needed, amend the ESL regulations to strengthen protection of these natural resource areas."

S-22 13) Page CE-11, policy CE-B.2.a. reads: "Manage watersheds and regulate floodplains to reduce disruption of natural systems, including the flow of sand to the beaches."

RECOMMENDATION: Please add: "Where possible and practical, restore natural floodplains and stream corridors to restore water filtration, flood and erosion control, biodiversity and sand replenishment benefits."

S-23 14) RECOMMENDATION: Page CE-11, policy CE-B.2.b. Please edit as follows:
"Limit grading and alterations of steep hillsides, cliffs and shoreline to ~~minimize~~ prevent increased erosion and minimize landform impacts."

Coastal Resources

S-24 15) RECOMMENDATION: Under "Coastal" on page CE-15, add a policy to: "Require landscaping to use local native plant species on coastal bluffs to avoid water seepage from irrigated landscaping that accelerates bluff erosion and cliff failure."

16) As ocean levels rise over the coming decades, coastal cliff/bluff erosion will accelerate prompting development of sea walls and coastal armoring to protect buildings sitting on the top of these coastal bluffs. Such structures will retard the natural shoreline retreat process and the beaches will become narrow and gradually be engulfed by the ocean.

S-25 RECOMMENDATION: Under Coastal on page CE-15, add a policy to: "Develop and implement requirements for planned retreat of structures along the shoreline so that beaches don't disappear due to coastal armoring."

S-19 Planning for management of sewer facilities located in canyons and the redirection of sewage discharge away from canyons are governed by Council Policies 400-13 and 400-14. Any changes to the criteria or financial formula contained in these policies will require review and approval of the City Council and will need to weigh the environmental benefit versus the additional financial costs to the City and individual property owners in the case of private pump stations. No additional language is needed in the General Plan. If the Council is interested in reviewing their policy they can do so, without it being dictated by the General Plan.

S-20 This policy applies to private development adjacent to open space preserves and is already implemented through Municipal Code Section 142.0403 General Planting and Irrigation Requirements, which states that invasive plant species must be removed when "surrounding environmental conditions provides a means for the species to invade other areas of native plant material that are on or off the premises." This section of the code also requires the use of native and naturalizing plant material for revegetation when adjacent to natural habitats.

S-21 See response to comment S-13.

S-22 See response to comments S-12 and S-13.

S-23 While it is the intent of the General Plan to protect the City's resources, it is not always possible to prevent all construction-related effects. All projects must adhere to the Storm Water Standards which includes measures to preclude erosion to the extent feasible.

S-24 Within the City's Land Development Manual Coastal Bluffs and Beaches Guidelines, there is a section that deals with Irrigation on Coastal Bluffs (143.0143(c)). It directs that plant material used on or adjacent to coastal bluffs shall be native or naturalized to

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minimize the need for irrigation beyond initial plant establishment. Permanent irrigation is not permitted on coastal bluffs. Temporary irrigation, consisting of drip and/or microsprayers may be permitted on a case-by-case basis as necessary to establish plants. Irrigation must be removed upon plan establishment.

- S-25 While staff understands the concern, such a recommendation is under the purview of the California Coastal Commission. Considerable funding and planning would be required prior to the implementation of such a recommendation.

COMMENTS

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S-26 17) RECOMMENDATION: Page CE-16, policy CE-C.10. Revise to read: "Promote the recovery of the declining fish stocks to assure the sustainability of local fishing. This effort involves combined efforts of the U.S. Fish and Wildlife Service, California Department of Fish and Game, marine biologists, and local fishing and coastal-related industry representatives."

S-27 18) RECOMMENDATION: Page CE-16, policy CE-C. Add a policy stating: "High water quality is necessary for a healthy marine environment. Provide the resources needed to assure that waste water discharges into the marine environment from point and non-point source meet the water quality standards."

Water Resources Management

S-28 19) COMMENT: Page CE-17, policy CE-D.1. Water conservation and efficient use of water must be aggressively pursued. This element is vague and lacks specific targets. The Pacific Institute report provides a high- efficiency scenario in which water use in California can be below 20 percent of year 2000⁹ levels. This can be accomplished without any new inventions. It requires statewide actions from legislators, water managers, water districts and agencies, farmers, corporations, and individuals.

S-29 20) Page CE-18, policy CE-D.1.c. We do not believe that desalinated seawater is necessary to provide a new source of water because the combination of water conservation, desalinated brackish water, and waste water reuse can provide the projected water demands. Desalinating seawater is highly energy intensive, harmful to the marine ecosystems, and requires use of precious coastal land resources. By comparison, these environmental impacts are significantly less for desalinating brackish water.

S-30 RECOMMENDATION: Revise policy CE-D.1.c. to read: "Participate in advanced water treatment processes to provide water supplies from sources such as brackish groundwater, storm water, and municipal waste water."

S-31 21) RECOMMENDATION: Page CE-18, policy CE-D.1.d., revise to read: "To help offset the need for imported water and desalinated seawater, emphasize and refine recycled water programs, namely the City's Water Reuse Study for non-potable and indirect-potable use."

S-32 22) RECOMMENDATION: Page CE-18, policy CE-D.1.f. Delete this policy as it is contradictory. On the one hand, it advocates more supply from water transfers; it then states that this is an element of an integrated water conservation strategy.

S-33 23) COMMENT: Page CE-18, policy CE-D.1.g. This and the prior policy on water transfers are dubious. Cost-effectiveness is not defined. The climate change can have significant impacts on the reliability, water quality, and energy costs of water. Water transfers must not be in violation of the endangered species act. On the endangered species issue, there have been two court rulings on the massive Delta pumps that deliver water to Southern California. The first was in

⁹ Gleick, Peter, et al. *California Water 2030: An Efficient Future*. Pacific Institute, Oakland, California, Sept. 2005 http://www.pacinst.org/reports/california_water_2030/index.htm

S-26 This policy is directed towards the fishing industry's economic viability. The suggested revision would redirect the policy towards biological diversity and coordination with state and federal wildlife resource agencies. The suggested revision is more appropriately addressed in an action plan or other City program, and has been forwarded to the appropriate staff.

S-27 The Storm Water Program continues to evaluate the feasibility of meeting Water Quality Standards for all pollutants in all storm conditions. For example, the City may not be able to achieve water quality standards for copper or pesticides in all watersheds while the state and federal governments continue to register these products (i.e., copper in brake pads) for legal use. Moreover, existing water quality standards apply regardless of storm conditions and many require treatment and/or infiltration. It may not be feasible to build treatment and/or infiltration facilities with a capacity great enough to handle very large storms. Finally, the water quality standards were developed with the Basin Plan in the 1970s and relate to the "beneficial uses" ascribed to various watersheds and their tributaries.

S-28 CE-D1 is a general policy statement that provides general direction. For details and specifics regarding current and planned conservation programs (including programs implemented in cooperation and under the guidance of other stakeholders) Refer to the *Long-Range Water Resources Plan (2002-2030)* and the *2005 City of San Diego Urban Water Management Plan*. These documents are available at the City Clerks' office, the Water Department offices and are available for download at the City's Water Department website (<http://www.sandiego.gov/water>).

It should also be noted that one purpose of the City's Landscape Regulations is "to conserve water through low-water-using planting and irrigation design" (see San Diego Municipal Code §142.0401). The landscape regulations promote water conservation by limiting lawn areas and requiring drought-tolerant species and efficient irrigation design. For example, the landscape

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regulations require lawn areas to not exceed ten percent of the planting area on a premise (excluding required common areas and active recreation areas). The regulations also require that all permanent re-vegetation utilize native, naturalized, or drought tolerant plant materials. Further, no irrigation runoff or overspray is permitted to cross paved areas and an approved rain sensor shutoff device must be installed on all irrigation systems.

- S-29 In terms of water supply portfolios, the City Council adopted the *Long-Range Water Resources Plan (2002-2030)* in 2002. The Plan outlines a decision-making framework for evaluating water supply options. The Long-Range Plan identified water conservation, water recycling, groundwater desalination, groundwater storage, ocean desalination, marine transport, water transfers, and imported supply from the Water Authority and Metropolitan as potential near term and long term supplies. As outlined in the Long-Range Plan, seawater desalination remains a potential source of reliable water supplies for the San Diego region. It would be imprudent for the City of San Diego to remove this potential supply source from consideration as an option altogether. However, the City of San Diego continues to evaluate the merits of any individual water supply project in terms of need, overall costs (including capital improvements, operational and maintenance costs), feasibility, and impacts to the environment.
- S-30 Comment noted.
- S-31 As noted under S-5 above, implementation of the recommendations outlined in the Water Reuse Study requires further analysis and outreach efforts with citizens and stakeholder groups. It is anticipated that said analysis and outreach will be conducted over the next 2-3 years in an effort to determine the optimal alternatives and strategies.
- S-32 The policy will be revised to read as follows: Pursue water transfers and other cost-effective ways to increase reliable supplies with minimal environmental effects, where it benefits the City, to help achieve a balanced, safe and reliable water supply strategy.

March 22, 2007 by an Alameda Superior Court judge¹⁰. The second came on May 25, 2007 by a Federal court judge in Fresno.¹¹ Ongoing scientific studies are showing a dramatic plunge in the Delta smelt an endangered fish species¹². In an unprecedented move, the State Department of Water Resources on May 31 shut down the pumps for a short period of time, though not enough to cause immediate water shortages¹³. However, unless the larger issues of the Delta water management and associated ecological issues are resolved, pump shut-downs can be expected to occur in the future.

S-34 The above water management section focuses on external use of water and does not adequately address internal water conservation measures. While internal water conservation measures such as ultra-low flow toilets and low-flow shower heads are nearing market saturation, there still is a need to continue a public outreach for high-efficiency clothes washers until this market is saturated. There is also a need to educate the public on wise water use.

Urban Runoff Management

S-35 24) RECOMMENDATION: Page CE-20. The discussion section should be updated to include the provisions of the latest MS4 permit. Specifically, this is the requirement for Low Impact Development (LID) in the development planning process¹⁴. There are a number of sources explaining LID. EPA has an index of LID references¹⁵.

S-36 25) RECOMMENDATION: Page CE-24, policy CE-E.2.f. Please edit to read: *“Avoid development of areas particularly susceptible to erosion and sediment loss (e.g., steep slopes) and, where impacts are unavoidable, enforce regulations that minimize those impacts.”*

S-37 26) RECOMMENDATION: Page CE-25, policy CE-E.6. Please add a policy to: “Increase and promote the provision of large item waste recycling facilities and drop-off locations for electronics, tires, construction debris, etc.”

S-38 27) RECOMMENDATION: Page CE-25, policy CE-E.6. Please add a policy to: “Increase enforcement of waste disposal regulations.”

Biological Diversity

S-39 28) RECOMMENDATION: Page CE-29, in the Discussion section, paragraph 3, please amend the sentence to read: *“The purpose of the MSCP is to preserve a network of habitat and open*

¹⁰ Taugher, Mike, *Judge’s ultimatum on delta pumps*, San Jose Mercury News 4/19/07 http://www.mercurynews.com/localnewsheadlines/ci_5701604

¹¹ Taugher, Mike, *Delta pump violates endangered species laws, judge rules*, Contra Costa Times 5/25/07 http://www.contracostatimes.com/news/ci_5988989

¹² Taugher, Mike, *Scientists Call for water cuts as Delta fish heads for extinction*. Contra Costa Times 5/22/07 http://www.contracostatimes.com/news/ci_5961818

¹³ Taugher, Mike, *State cuts of pumps: unprecedented move to save smelt*, Contra Costa Times, 6/01/07 http://www.contracostatimes.com/news/ci_6036676

¹⁴ RWQCB Order R9-2007-0001 page 7

¹⁵ USEPA *Low- Impact Development Page*, <http://www.epa.gov/nps/lid/>

S-33-34 As noted in the 2005 *City of San Diego Urban Water Management Plan*, water transfers are defined as voluntary, market-based exchanges of water from willing sellers to willing buyers. It is estimated that agriculture uses 80 percent of California’s water supply while urban customers use 20 percent. During the past decades, several landmark long-term water transfers from agriculture to urban customers have been accomplished that are considered beneficial to both parties. In 2003, the Imperial Irrigation District agreed to sell conserved water to the Water Authority. This is a 75-year agreement that will, over time, provide 200,000 AF of water to the Water Authority and its member agencies. Water transfers, where determined to be cost effective and feasible from an environmental stewardship perspective, may provide a viable water supply option to improve supply reliability within the region.

In regard to cost effectiveness: The Long-Range Plan provides a preliminary evaluation of different water supply portfolios based on eight criteria measures including cost minimization, environmental impact and maximum flexibility. Cost effectiveness provides a quantitative measure that generally takes into account initial capital outlay as well as long term operation and maintenance expenses. The General Plan should include all possible options that have the potential to benefit the City and the citizens, and these options will eventually be thoroughly reviewed and assessed using such considerations mentioned by the Sierra Club.

The Water Department agrees on the need to further educate the public on wise water use practices. A policy to reflect this need will be added to the Conservation Element.

The City of San Diego Water Department (in partnership with the County Water Authority) participates in the High-Efficiency Clothes Washer (HEW) Voucher Program. The HEW voucher program provides a point-of-purchase discount of \$125 off the cost of a new qualifying HEW. These machines use 40 percent less water and 60 percent less energy per load than standard top-loading machines.

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- Currently, San Diego Gas and Electric (SDG&E) also provides a \$35.00- \$75.00 incentive for HEWs, thereby increasing the total incentive for City customers up to \$200.00. The City is committed to continue to pursue ways to fund similar programs until the market is saturated as noted by the comment.
- S-35 The new MS4 permit was adopted on January 24, 2007, has a five year term, and most provisions will become effective on January 24, 2008. The complete permit can be found at: http://www.waterboards.ca.gov/sandiego/programs/sd_stormwater.html, and sections pertaining to development and LID begin on page 16.
- S-36 Staff believes that the policy as written adequately addresses the issue of erosion and sediment loss.
- S-37 Currently, the City provides a large item drop off for certain materials at its Miramar Landfill, and the private sector provides many construction and demolition debris recycling facilities. The City's Environmental Services Department provides public outreach on this topic, and plans changes and expansions to the existing program.
- S-38 The Environmental Services Department currently provides code compliance of waste disposal regulations. If the commenter has specific recommendations for how the program should be modified, she may contact that department.
- S-39 Comment noted. The Implementing Agreement by and between the United States Fish and Wildlife Service, the California Department of Fish and Game, and the City of San Diego requires that implementation of the MSCP Subarea Plan comply with provisions of the ESA in regards to Take and Incidental Take of covered species of which species recovery is a component; however, the commenter is incorrect in stating the MSCP's "purpose" is to comply with species recovery.

COMMENTS

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space and to comply with the "species recovery" requirements of the federal Endangered Species Act."

29) A federal judge has ruled that we are not meeting the requirements of the Endangered Species Act with respect to seven vernal pool species.

S-40 RECOMMENDATION: Page CE-30. Edit first paragraph, to read: "*The MSCP, and the associated sub-area plans, seek to meet the requirements of the federal Endangered Species Act and the California Natural Community Conservation Program.*"

S-41 30) RECOMMENDATION: Page CE-30, under policy CE-G.1. Add a policy as follows: "Amend the ESL to comply with Endangered Species Act requirements with respect to all vernal pool species."

31) Page CE-30, policy CE-G.4. reads: "*Consider important ecological resources when determining where to apply floodplain regulations and development guidelines.*"

S-42 This policy seems to suggest that there are places in the floodplains where floodplain regulations and development guidelines do not need to be applied!

RECOMMENDATION: Rewrite this policy to read: "Protect important ecological resources in the floodplains with strict application of floodplain regulations and development guidelines."

Wetlands

32) Currently, our City regulations and mitigation requirements are more protective of our unique wetland habitats than state or federal regulations. Agency regulations for resources such as wetlands change from time to time. Given the now common knowledge about the critically important resource values and green infrastructure values that wetland habitats provide, our policy should be to enforce the most protective regulation for their conservation.

S-43 RECOMMENDATION: Page CE-32, policy CE-H.8. Please edit the policy to read as follows: "Implement an "avoidance first" policy and where wetlands impacts absolutely cannot be avoided, implement a "no net loss of wetlands acreage" approach in addition to other mitigation requirements to achieve wetlands conservation in accordance with all city, state, and federal regulations."

Agricultural Resources

33) Pesticides and fertilizers from agricultural operations are a major source of pollution into nearby rivers and creeks. A strip of grassy swale can only do so much to alleviate the nutrient load. Often crops are planted immediately adjacent to the banks of the streams. A healthy riparian wetland corridor in a 40' - 50' zone along the streambed would help significantly to filter agricultural pollutants before the runoff reaches the stream and subsequently the coastal waters.

S-40 The suggested revision was made to the last paragraph of the General Plan Conservation Element Section G discussion.

S-41 Amendments to the Environmentally Sensitive Lands (ESL) Regulations would require an amendment to the Land Development Code and additional CEQA review. Such action is not within the purview of the General Plan Update and this Program EIR.

S-42 FEMA floodways and floodplains are reviewed on a project level basis. Flood hazard regulations apply to those areas of potential effect.

S-43 An "avoidance first" approach is currently implemented as part of the Land Development Code. The ESL regulations of the Land Development Code apply to areas containing sensitive biological resources, particularly wetlands. The regulation states that "impacts to wetlands, in naturally occurring complexes shall be avoided." In addition, the ESL regulations, and the Biology Guidelines require mitigation for impacts associated with a deviation to this regulation to achieve the goal of no-net-loss and retain the in-kind functions and values of the wetland.

S-44

RECOMMENDATION: Page CE-40, policy CE-L.5. Please add the following policy: "Require a natural riparian wetland buffer of 40' minimum along a river or creek bed on City-owned agricultural lands to filter agricultural pollutants before the runoff reaches the stream. Provide incentives to encourage a natural riparian wetland buffer of 40' along a river or creek bed on privately owned agricultural lands to filter agricultural pollutants before the runoff reaches the stream."

Environmental Education

S-45

34) RECOMMENDATION: Page 45, policy CE-N.1. Please add a policy as follows: "Encourage and support incorporation of environment-based education in public and private schools to meet standard curriculum requirements at appropriate grade levels and according to adopted state legislation (AB 1458) the "Education and the Environment Initiative", adopted in 2003. Where appropriate and while protecting the natural habitats, utilize San Diego's natural open spaces, such as our urban canyons, as nature classrooms for youth programs and in conjunction with environment-based education."

PUBLIC FACILITIES, SERVICES, AND SAFETY ELEMENT POLICIES:

Wastewater

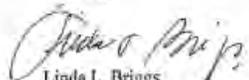
S-46

35) RECOMMENDATION: Page PF-27, add policy PF-F.15. "Upgrade Pt. Loma Wastewater Treatment Plant from advanced primary to secondary to comply with the Clean Water Act."

CONCLUSION

The San Diego Chapter of the Sierra Club very much appreciates your consideration and incorporation of the above recommended improvements and additions to the policies of the General Plan Conservation Element and Public Facilities Element. If you have any questions or would like additional information, please do not hesitate to contact me at (619) 528-8545.

Sincerely,



Linda L. Briggs
Chair, Conservation Committee
Sierra Club, San Diego Chapter

S-44

General principles to prevent pollution associated with runoff (including agricultural activities) are outlined under Section E of the Conservation Element. Specific regulations and standards governing the control of agricultural pollutants within Water Department owned lands are found in the City's *Urban Runoff Management Program* (see Section 2.3, City-Owned Leased Properties), the San Diego Municipal Code §43.0301 et seq, (Chapter 4, Article 3, Division 3: Storm Water Management and Discharge Control) and the City's Storm Water Standards (Revised May 30, 2003). It should also be noted that the Regional Water Quality Control Board (RWQCB) also regulates discharges associated with agricultural activities through the Waste Discharge Requirements (WDRs) program and the National Pollutant Discharge Elimination System (NPDES) permit process. A forty-foot buffer may not be feasible in all areas (thus requiring other effective measures), and in some areas a forty-foot buffer may not be enough to protect resources. Staff evaluates resource protection measures on a project-by-project basis.

S-45

This recommendation is addressed in both Policies CE-N.1 and CE-N.9. To address state legislation, Policy CE-N.1 has been revised to read "Utilize state and local legislation to continue to expand City programs that create and sponsor....."

S-46

See response to comment S-3.



CENTER for BIOLOGICAL DIVERSITY

Because life is good.

VIA EMAIL ~~EXHIBITS~~

June 25, 2007

Ms. Marilyn Mirrasoul
 City of San Diego Development Services Center
 1222 First Avenue, Mail Station 501, 5th Floor
 San Diego, California 92101
 Email: mmirrasoul@sandiego.gov

Re: Comments on the Draft Program Environmental Impact Report for the City of San Diego General Plan Update (SCH # 2006091032)

Dear Ms. Mirrasoul:

These comments are submitted on behalf of the Center for Biological Diversity ("Center") on the Draft Environmental Impact Report ("DEIR") for the City of San Diego General Plan Update ("GP Update"). The Center is a non-profit environmental organization dedicated to the protection of native species and their habitats through science, policy, and environmental law. The Center has over 35,000 members throughout California and the United States. As an initial matter, please ensure that the Center is on the mailing list for all future notices and documents relating to the GP Update. Our specific comments on the DEIR focus on the failure of the DEIR to adequately analyze and mitigate several areas of importance, including but not limited to greenhouse gas ("GHG") emissions, air quality, water supply, and energy demand. Further, the Enhanced Sustainability Alternative was not adequately described, nor were other feasible, environmentally superior alternatives discussed. The City should revise and recirculate these sections of the DEIR. Please find specific comments below.

T-1

I. THE DEIR CONTAINS INADEQUATE ANALYSIS AND MITIGATION OF GREENHOUSE GAS EMISSIONS

A. The DEIR Fails to Provide an Adequate Inventory of GHG Emissions

The DEIR incorporates the GHG analysis contained in the Climate Protection Action Plan (CPAP) into the cumulative impacts analysis of Section 5.2. The various sources of GHG emissions are broken down into three categories: energy; transportation; and waste. However, it is unclear what these categories cover and whether they cover all sources of greenhouse gases in the City, for example municipal, residential, industrial/commercial, agricultural, water transport, building material, and other sources of greenhouse gases. The DEIR tables note that the emission figures are from the CPAP. (DEIR, p. 5-25) Appendix G to the CPAP gives the data origination and formulas for calculations in the CPAP. Appendix H details the break-down of the waste, energy and transportation figures into a few sub-categories. However, the information in these appendices is still insufficient. First, the DEIR should include the calculation information in the document itself, not simply in an appendix to a reference document. Second, the calculations in

T-2

T-3

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- T-1 The Center for Biological Diversity has been placed on the mailing list for all future notices and documents related to the GP update.
- T-2 Table 5.2-1 in Section 5.2 (page 5-25) of the DPEIR shows GHG emissions broken down into three categories: energy; transportation; and waste. This table includes total GHG emissions from all residences, businesses, industries, municipal operations and other sources within City limits as provided in the City's adopted Climate Protection Action Plan (CPAP). A footnote has been added to the table to include this explanation. In addition, the DEIR cites the CPAP as the source of the information provided on Table 5.2-1. According to the CEQA Guidelines (§15148), documents relied upon for information in an EIR, such as scientific documents, should be cited but not included in the EIR. In addition, the text of page 5-25 of Section 5.2 of the Final EIR has been updated to incorporate the CPAP by reference. Therefore, citation of the CPAP is sufficient and the calculation information of the CPAP appendices need not be included in the DEIR.
- T-3 Section 5.2 of the DEIR provides an analysis of the GHG emissions associated with Vehicle Miles Traveled (VMT), energy consumption, and solid waste decomposition associated with future development that occurs in accordance with the General Plan. This GHG emissions analysis is based on a calculation of GHG emissions that would be associated with projected VMT under the General Plan and CPAP data indicating that the energy and waste sectors are projected to account for a majority (60 percent) of the City's total GHG emissions in 2010. The analysis also cites CPAP data on the total GHG reductions the CPAP GHG reduction measures have achieved by sector. This information informs the conclusion of the DEIR that population growth and development that occurs in accordance with the General Plan would result in increased VMT and energy consumption (solid waste-related GHG emissions would be substantially lower due to ongoing implementation of CPAP measures), which in turn would result in substantial levels of GHG emissions in excess of existing and 1990 levels. Although further analysis of the GHG emission by sector is not provided in the EIR, the calculations and information cited

from the CPAP is “sufficient to permit full assessment of significant (global warming) impacts” (CEQA Guidelines §15147).

Furthermore, CEQA Guidelines, §15126.6(d) requires the alternatives discussion of an EIR to include “sufficient information about each alternative to allow meaningful evaluation, analysis, and comparison with the proposed project”. The environmental impacts of the Enhanced Sustainability alternative are analyzed and compared with the General Plan in general terms. The DEIR explains that the implementation of sustainable building techniques such as energy efficient design, landscaped “green roofs”, and renewable energy production would reduce the burning of fossil fuels for energy and therefore reduce air quality impacts; and implementation of requirements for recycled water systems and reduced water consumption would reduce the consumption of energy required to import potable water into the City. This alternative would also have reduced impacts to hydrology, mineral resources, public utilities, and water quality when compared to the General Plan. The DEIR concludes in Section 7.4 that the Enhanced Sustainability alternative would be environmentally superior to the General Plan (page 7-31). The City has also added language to the Final EIR stating that the Enhanced Sustainability alternative would be environmentally superior to the General Plan with respect to the level of GHG emissions. Thus, the alternatives discussion includes “sufficient information about each alternative to allow meaningful evaluation, analysis, and comparison with the proposed project” (CEQA Guidelines, §15126.6(d)). A calculation of GHG emissions levels of the alternatives is not required under CEQA to conduct a meaningful evaluation and comparison of the alternatives and determine the environmentally superior alternative.

the appendices are still not fully explained. A further break-down and evaluation of these categories is necessary to fulfill the information disclosure mandate of CEQA and would also inform the analysis and selection of feasible mitigation measures and alternatives. Furthermore, in order to effectively analyze alternatives, the DEIR should calculate emission levels under alternative scenarios in comparison to emission levels under the proposed GP Update.

B. The EIR's Analysis of Feasible Mitigation Measures and Alternatives for GHG Emissions is Inadequate

1. *The Mitigation Framework Is Inadequate*

The DEIR's mitigation measures for GHG emissions are largely targeted at municipal activities and measures contained in the CPAP. The terms of CEQA do not permit such a narrow treatment of its critical requirement to mitigate impacts to the maximum extent feasible. CEQA requires analysis and adoption of all feasible mitigation measures for a project' potentially significant environmental impacts. (CEQA Guidelines § 15126.4(a)(1)(A) and (B); Cal. Pub. Res. Code §§ 21002, 21081, 21100(b)(3); see also *Citizens of Goleta Valley v. Bd. of Supervisors*, 52 Cal. 3d 553, 564-65 (1990)). Therefore, the DEIR may not focus solely on the measures included in the CPAP for its CEQA compliance. Instead, the DEIR should include all feasible mitigation measures that would reduce GHG emissions, which may necessitate and result in greater reductions than proposed in the CPAP.

T-4

As the Guidelines clarify, if an EIR indicates that a project may have a significant impact on the environment, such as through its greenhouse gas emissions, the agency must respond to this information by "one or more of the following methods:" (1) changing the project; (2) imposing conditions on the approval of the project; (3) adopting plans or ordinances to control a broader class of projects to avoid the adverse changes; (4) choosing an alternative way of meeting the same need; (5) disapproving the project; (6) finding that changing or altering the project is not feasible; and (7) finding that the *unavoidable* significant environmental damage is acceptable as provided in Section 15093. 14 Cal. Code Regs. § 15002(h).

The CEQA Guidelines explain that "mitigation" includes: (a) avoiding the impact altogether by not taking a certain action or parts of an action; (b) minimizing impacts by limiting the degree or magnitude of the action and its implementation; (c) rectifying the impact by repairing, rehabilitating, or restoring the impacted environment; (d) reducing or eliminating the impact over time by preservation and maintenance operations during the life of the action; and (e) compensating for the impact by replacing or providing substitute resources or environments. 14 Cal. Code Regs. § 15370.

Mitigation measures must be fully enforceable through permit conditions, agreements, or other legally binding instruments. (14 Cal. Code Regs. § 15091(d); *id* at 26.4(a)(2)) "In the case of the adoption of a plan, policy, regulation, or other public project, mitigation measures can be incorporated into the plan, policy, regulation, or project design." (*Id* at 26.4(a)(2)). CEQA states that "with some projects, the only feasible mitigation for cumulative impacts may involve the adoption of ordinances or regulations rather than the imposition of conditions on a project-by-project basis." (CEQA Guidelines § 30(c)).

T-4 As discussed in the response to comment B-1, the City met with Deputy Attorney General Sandra Goldberg to discuss the City's obligation under CEQA to examine and require feasible options for mitigating the GHG emissions of future development. The City has taken the following approach to address this issue: (1) modify the policy language of the October 2006 Draft General Plan to expand and strengthen climate change policies; (2) ensure that policies to reduce greenhouse gas (GHG) emissions are imposed on future development and City operations by incorporating them into the Mitigation Monitoring and Reporting Program (MMRP) for the Final EIR; and (3) initiate work on a General Plan Action Plan to identify measures such as new or amended regulations, programs and incentives to implement the GHG reduction policies.

The municipal component of GHG emissions is only two percent of all GHG emissions. (DEIR, p. 5-25) The DEIR impacts analysis states that the CPAP measures to reduce GHG emissions are not anticipated to substantially reduce GHG emissions associated with the projected VMT increase of 24 percent higher emissions in 2030 than 1990 levels. This in part reflects the fact that transportation emissions are largely attributable to non-municipal vehicles. Consequently, in order to achieve the 5,488,000 tons/per year of GHG reduction required to meet the CPAP goal of 15 percent reduction from 1990 levels by 2010 and in order to meet the mandates of CEQA, much more than municipal mitigation is required. The CPAP itself states that: "the contribution of every individual in the community to reduce energy and vehicle use is the final factor that translates the 15% goal into a reality." (CPAP, p.3)

T-5 The mitigation measures proposed in the DEIR clearly do not meet the mitigation mandates of CEQA. The DEIR admits as much in identifying sources of GHG emissions that it and the CPAP do not address. For example, the DEIR states:

As shown above, total GHG reductions in the energy sector have been modest. Although the City's action plan includes measures to further reduce energy-related GHG emissions by 2010, these measures are not anticipated to substantially reduce the GHG emissions associated with the energy consumed by future discretionary development projects (e.g., residences, businesses, and other land uses and buildings) that occur in accordance with the Draft General Plan. Therefore, in addition to increased VMT, it is assumed that energy consumption associated with population growth and development that occurs in accordance with the Draft General Plan will also result in substantial levels of GHG emissions in excess of existing and 1990 levels.

T-6 (DEIR, p. 5-26) The failure to address these "substantial emissions" represents a clear violation of CEQA and must be remedied in a revised EIR.

T-7 Mitigation measures for the GP Update's significant GHG emissions may not be deferred to some later date as the DEIR attempts to do. For example, DEIR Section 5.3 states that future discretionary projects may require additional measures in order to avoid or reduce incremental contribution to GHG emissions, but it does not specify or mandate any such measures. The current mitigation framework only involves general allusions to future measures such as minimization of GHG emissions to the extent feasible in development project proposals and conformity with the City of Villages Strategy. The only arguably specific mitigation measure included is the establishment of a global warming monitoring program. (DEIR, p.5-26) This alone is not truly a mitigation measure as it does nothing to reduce the GP Update's GHG emissions.

It is critical that meaningful, binding mitigation measures be incorporated into the GP Update and EIR. Future discretionary projects in the City will be subject to the GP. As the GP itself emphasizes:

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T-5 See the responses to comments T-4 and B-1 for a discussion of the City's approach to meet its obligation under CEQA to examine and require feasible options for mitigating the GHG emissions of future development.

T-6 See the responses to comments T-4 and B-1 for a discussion of the City's mitigation of the project's substantial GHG emissions in compliance with CEQA.

T-7 See the responses to comments T-4 and B-1 for a discussion of the City's approach to meet its obligation under CEQA to examine and require feasible options for mitigating the GHG emissions of future development. The inclusion of General Plan policies that reduce GHG emissions in the MMRP for the Final EIR ensures that they will be imposed on future development and not deferred to some later date. Pursuant to CEQA Guidelines §15097(b), "(t)he monitoring plan (for a general plan) may consist of policies included in (the) plan-level document."

The City's General Plan is its constitution for development. It is the foundation upon which all land use decisions in the City are based. It expresses community vision and values, and it embodies public policy for the distribution of future land use, both public and private.

(General Plan, SF-2)

T-8

In order to mitigate the GHG emissions from increased transportation and energy use predicted in the DEIR, the GP and EIR must contain specific measures designed to reduce GHG emissions, not general statements deferring mitigation to some future time. As stated by the Governor, "mitigation efforts will be necessary to reduce greenhouse gas emission and adaptation efforts will be necessary to prepare Californians for the consequences of global warming." (Executive Order S-3-05, June 1, 2005) The Attorney General urged San Bernardino to include measures in its GP Update such as: altering building codes and permit requirements to require measures such as solar panels; providing increased public transportation services; supporting alternative fuels; and installing electric vehicle charge stations. (Exhibit 1 (Attorney General San Bernardino General Plan DEIR Comment Letter, October 23, 2006), p. 6; Exhibit 2, Attorney General Petition filed in *People of the State of California ex rel. Attorney General Edmund G. Brown v. County of San Bernardino*, Case No. SS 700329 (San Bernardino County Superior Court) (filed April 12, 2007) (challenging San Bernardino General Plan Update in part for failure to analyze and mitigate global warming impacts)).

Some examples of mitigation measures that the City should implement through mandatory measures and where appropriate revisions to the Municipal Code include:

T-9

- Public transit measures, such as increased bus transit, rail service, and other modes of transport to reduce vehicle miles traveled; pedestrian, bicycles, and other non-motorized transportation improvements;

T-10

- Electric vehicle charging stations;

T-11

- Diesel truck anti-idling/electrification requirements;

T-12

- Conversion of local and private fleets to alternative fuel vehicles and requirement that fleets to run on alternative fuels;

T-13

- Carpool/rideshare alternative fuel vehicle, and transit programs/incentives;
- Mandatory energy efficiency/green building requirements for local government *and* private development projects approved after adoption of the General Plan, such as requiring:

T-14

- o Construction of the most energy-efficient buildings possible, to decrease heating, cooling, and other energy demands, for example by following the highest available U.S. Green Building Council's LEED (Leadership in Energy and Environmental Design) or comparable standards for energy- and resource-efficient building during pre-design, design, construction, operations and management;

T-15

- o Utilization of highest efficiency heating, cooling, and lighting devices and appliances;

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4

T-8

As discussed in the responses to comments T-4, T-7, and B-1, the City has included General Plan policies that reduce GHG emissions in the MMRP for the Final EIR to ensure that they will be imposed on future development upon adoption of the General Plan and not deferred to some later date. Pursuant to CEQA Guidelines §15097(b), "the monitoring plan (for a general plan) may consist of policies included in (the) plan-level document". The implementation measures of the General Plan Action Plan designed to reduce GHG emissions would also be imposed on future development as they are adopted.

T-9 - T-23

See the General Plan Action Plan for a listing of the implementation measures the City shall undertake to reduce the GHG emissions of future development. Also see the response to comment B-1 for a discussion of the General Plan policies designed to reduce GHG emissions that will be imposed on future development.

- T-16 o Use of skylights and other sources of natural light and fluorescent and compact fluorescent lighting to reduce energy use for lighting;
- T-17 o Minimization and recycling of construction-related and other waste;
- T-18 o Use of salvaged, recycled-content, and other materials that required the lowest possible amount of energy to produce for building, hard surfaces, and non-plant landscaping materials;
- T-19 o Maximization of water conservation measures in homes and landscaping, using drought-tolerant plants in lieu of turf, planting shade trees;
- T-20 o Installation of the maximum possible solar energy array on the building roofs and/or on the project site to generate solar energy for the facility;
- T-21 o Use of passive heating, natural cooling, solar hot water systems, and reduced pavement;
- T-22 o Landscaping that preserves natural vegetation, reduces water use, and maintains watershed integrity; and
- T-23 o Installation of electric vehicle charging stations at facilities

Providing additional examples of mitigation measures that could and should be adopted by local jurisdictions in order to mitigate the impacts of their GHG emission, the city of Berkeley recently passed residential and commercial ordinances that require measures such as: increased insulation and weather-proofing; incandescent light bulbs; and low-flow devices for faucets. See City of Berkeley Residential Energy Conservation Ordinance and Commercial Energy Conservation Ordinance, Berkeley Muni. Code, Title 19, available at <http://www.cityofberkeley.info/bmc/BerkeleyMunicipalCode/Title19/72/index.html>. Also, recently Berkeley residents passed Measure G, which calls for: mandatory green building requirements, such as using recycled materials, even for small residential projects; strict energy efficiency requirements for all new buildings, resold homes and renovations requiring permits; replacement of older appliances, insulation upgrades and additions; window upgrades and outlets for electric cars in garages. (Exhibit 3); see also Exhibit 4 (Green Communities Checklist); and Exhibit 5 (San Diego City Attorney Interim Report No. 11, *A Call to Action: City of San Diego Must Prepare Its Infrastructure to Withstand Anticipated Impacts From Global Warming*, Report of the San Diego City Attorney (August 31, 2006)).

T-24 In sum, more than municipal reductions, volunteer efforts and discretionary programs are needed to mitigate the GP Update's GHG emissions in compliance with CEQA. The General Plan already lists eight policies aimed at reducing GHG emissions. (General Plan, p.CE-28) However, of these eight policies, two are continuation of current projects, five are supportive measures, and none are mandatory. Additional measures must be incorporated and should be made mandatory and enforceable by also becoming part of the San Diego Municipal Code. Without specific measures, San Diego will not effectively reduce its GHG emissions and is in violation of CEQA's mandate to do so.

T-25 A final flaw with the DEIR's treatment of mitigation is its conclusion that the degree of future impacts and the success of future mitigation measures cannot be known for specific future projects at this program level of analysis. (DEIR, 5-28) This statement is unsupported. Specific mitigation measures aimed at reducing the projected increase in energy, waste, and transportation GHG emissions could and must be successfully implemented now, though the GP Update and

T-24 As discussed in the response to comment T-7, the inclusion of General Plan policies that reduce GHG emissions in the MMRP for the Final EIR ensures that they will be imposed on future development. Pursuant to CEQA Guidelines §15097(b), “the monitoring plan (for a general plan) may consist of policies included in (the) plan-level document”. The implementation measures of the General Plan Action Plan designed to reduce GHG emissions would also be imposed on future development as they are adopted.

T-25 The DEIR correctly concludes that since no specific land development or community plan amendment projects are included in the General Plan, the degree of future impacts and applicability, feasibility, and success of future mitigation measures cannot be adequately known for each specific future project at this program level of analysis. Although the revised policy language of the Conservation Element and the implementation measures identified in the Action Plan would reduce the level of GHG emissions associated with future development, it is infeasible at the Program EIR level of analysis to provide specific mitigation that would reduce the global warming impacts of all future projects to a less than significant level. Therefore, the cumulatively considerable incremental contribution to the worldwide increase in GHG emissions represented by development that is anticipated to occur with implementation of the General Plan is considered significant and unavoidable.

See the response to comment R-5 for a discussion of the revised General Plan policies that would impose enhanced sustainability measures discussed in the Enhanced Sustainability alternative on future development.

EIR process. The DEIR itself admits as much in the alternatives analysis. The Enhanced Sustainability alternative would include mandatory policies "as a means of further reducing the environmental effects of the Draft General Plan related to energy and water consumption, solid waste generation, water quality and air quality." (DEIR, 7-14) According to the DEIR, this alternative would meet all of the plan objectives and is environmentally superior.

T-26 The proposed DEIR mitigation framework relies on nature project-specific measures to mitigate non-municipal emissions and therefore reaches the conclusion that success cannot be adequately determined. Utilization of mandatory regulations in the GP Update and EIR would mitigate impacts in a way that is easily determined. For example, if all residential homes were required to be Energy Star compliant, potential energy savings would be 25 to 30 percent compared with current consumption.¹ Similar results would apply to the commercial sector. In 2005, the Energy Star program avoided 34.2 MMTCE in national emissions.² Applying such a program locally with the maximum feasible energy efficiency ratings (which may be substantially higher than Energy Star) would reduce San Diego's contribution to the cumulative impacts of GHG emissions.

T-27 The cumulative impacts of the GP Update are clear. Mitigation measures are available to address and neutralize the City's contribution to GHG emissions. Stating that future project impacts and mitigation success cannot be adequately determined now is merely the result of the DEIR's failure to attempt to outline and incorporate mitigation measures with any specificity at this point in the planning process, when such measures are particularly appropriate and necessary.

2. The Enhanced Sustainability Alternative Must be Improved and Selected

T-28 The DEIR states that the Enhanced Sustainability Alternative meets all of the GP objectives and is environmentally superior. (DEIR, p. 7-18) One preliminary issue with this alternative is that its proposed measures are not specified, and thus comparison of this alternative and others is not possible. The alternative is described in the DEIR as follows:

[This alternative would add mandatory policies to the Draft General Plan to enhance the Sustainability of future development within the plan area. These policies would include requirements for: builders/owners to employ sustainable building techniques (e.g., energy efficient design; landscaped "green" roofs; recycled building materials; renewable energy generation [e.g., solar panels]) in private developments; the installation of recycled water systems for large development projects; and reductions in water consumption associated with existing and future development in the plan area (e.g., landscaping associated with residential land uses, landscaping and fields within parks and open spaces, etc.).

¹ See http://www.energystar.gov/ia/news/downloads/annual_report2005.pdf, Executive Summary p. 3.

² See http://www.energystar.gov/ia/partners/downloads/energy_star_report_aug_2003.pdf, Residential Energy Efficiency p.3.

T-26 The commenter is correct in that the success of a specific mitigation measure, such as the Energy Star compliance example presented in the comment, can generally be determined. However, this comment misrepresents the conclusion of the DEIR. The DEIR states that since no specific land development or community plan amendment projects are included in the General Plan, the degree of future impacts and applicability, feasibility, and success of future mitigation cannot be adequately known for each specific future project at this program level of analysis. The applicability, feasibility, and success of future mitigation cannot be determined until specific land development or community plan amendment projects are proposed. Since the success of future mitigation cannot be adequately known for each and every specific future project at this time, the DEIR concludes that cumulative global warming impacts are significant and unavoidable at the program level of analysis.

T-27 See the response to comment B-1 for a discussion of the City's approach to meet its obligation under CEQA to examine and require feasible options for mitigating the GHG emissions of future development. Furthermore, the conclusion of the DEIR that the degree of future impacts and applicability, feasibility, and success of future mitigation cannot be adequately known for each specific future project at this program level of analysis is based on the fact that no specific land development or community plan amendment projects are included in the General Plan. The applicability, feasibility, and success of future mitigation cannot be determined until specific land development or community plan amendment projects are proposed.

T-28 The environmental impacts of the Enhanced Sustainability alternative are analyzed and compared with the General Plan in general terms. The DEIR explains that the implementation of sustainable building techniques such as energy efficient design, landscaped "green roofs", and renewable energy production would reduce the burning of fossil fuels for energy and therefore reduce air quality impacts; and implementation of requirements for recycled water systems and reduced water consumption would

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reduce the consumption of energy required to import potable water into the City. This alternative would also have reduced impacts to hydrology, mineral resources, public utilities, and water quality when compared to the General Plan. Based on the analysis of Section 7.2, the DEIR concludes in Section 7.4 that the Enhanced Sustainability alternative would be environmentally superior to the General Plan. Thus, the alternatives discussion includes “sufficient information about each alternative to allow meaningful evaluation, analysis, and comparison with the proposed project” (CEQA Guidelines, §15126.6(d)). More specific enhanced sustainability measures are not required to evaluate this alternative and compare it with the General Plan.

The Draft General Plan includes similar policies that encourage, but do not require, more sustainable development.

(DEIR, p. 7-14).

T-29

This alternative appears to incorporate some of the suggestions outlined above for specific mandatory mitigation measures to mitigate the GP Update's GHG emissions, but the DEIR does not actually specify which measures would be required. In order to fully analyze this alternative, the DEIR should define the precise measures that would be required and should include the measures outlined above and all other feasible mitigation measures to reduce the GP's GHG emissions. In addition, more detail about the air quality, GHG and other measurable benefits of this measure must be provided in order to enable a more accurate comparison of this and other alternatives, including the Draft GP.

T-30

This alternative should also be expanded to further describe its benefits for the decisionmakers. The comparison with the Draft General Plan is very cursory. Under many sections is a brief statement that the alternative "would result in similar impacts related to ...when compared to the Draft General Plan," but omits key information. For example, biological resources would benefit from a decrease in water pollution and reduced hydrological interruption. Also, the benefit of this alternative could be a substantial reduction in GHG emissions in San Diego, which would mitigate the cumulative impacts on global warming and provide air quality and public health co-benefits.

In addition to more effectively meeting the conservation, public facilities, and recreation element objectives of the GP, the Enhanced Sustainability alternative would better achieve the GP's goal of making San Diego "a leader in clean technology." (GP, p. CE-4)

3. *The DEIR Fails to Mention the Economic Costs Associated with its GHG Emissions*

T-31

The DEIR also fails to disclose the economic cost of the project's greenhouse gas emissions. Accounting for the economic cost of greenhouse gas emissions is entirely appropriate under CEQA. For example, under CEQA Guidelines section 15064(e), the "economic and social effects of a physical change may be used to determine that the physical change is a significant effect on the environment. If the physical change causes adverse economic or social effects on people, those adverse effects may be used as a factor in determining whether the physical change is significant." Furthermore, in assessing the feasibility of mitigation measures and alternatives, the City must consider the costs of its greenhouse gas emissions.

A large, peer-reviewed literature exists on estimating the social costs of climate change and quantifying the cost of carbon dioxide emissions. As this field has developed, the methodology and inclusiveness of economic studies has improved. At the same time, the scientific understanding of global warming impacts and predictive ability has also improved. The result is that the estimated cost of greenhouse gas emissions in the literature has increased steadily, and we now know that the cost of continued greenhouse gas emission trajectories would be astronomical. While estimating the economic impact of greenhouse gas emissions cannot

T-29

As discussed in response to comment T-28, the identification of more specific enhanced sustainability measures is not required to fulfill CEQA requirements for the meaningful evaluation, analysis, and comparison of alternatives to the proposed project. The response to comment T-28 also explains that Section 7.2 of the DEIR analyzes the benefits of the Enhanced Sustainability alternative compared to the General Plan, and that this discussion is adequate under CEQA. As discussed in the response to comment T-3, the City has also added language to the Final EIR stating that the Enhanced Sustainability alternative would be environmentally superior to the General Plan with respect to the level of GHG emissions. More detailed information about the measurable benefits is not required.

T-30

As already described in the response to comments T-28 and T-29, the DEIR discussion of the Enhanced Sustainability alternative is adequate under CEQA. Furthermore, the City agrees with the comment that a "benefit of this alternative could be a substantial reduction in GHG emissions...", and has added language to the Final EIR stating that the Enhanced Sustainability alternative would be environmentally superior to the General Plan with respect to the level of GHG emissions.

T-31

CEQA Guidelines §15064(e) states that the "economic and social effects of a physical change may be used to determine that the physical change is a significant effect on the environment. If the physical change causes adverse economic or social effects on people, those adverse effects may be used as a factor in determining whether the physical change is significant." The DEIR includes a detailed discussion of the projected impacts of global warming to the people, economy and environment of California. Furthermore, the DEIR concludes that the incremental GHG emissions associated with future development would cause a cumulatively considerable incremental contribution to the significant cumulative (worldwide) impacts when viewed in connection with worldwide GHG emissions, and would incrementally contribute to the adverse economic, public health, natural resources, and other

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environmental impacts projected to occur in California and throughout the world as a result of global warming. Thus, the DEIR concludes that the General Plan's GHG emissions are considered cumulatively considerable in part for their incremental contribution to adverse economic impacts in California and throughout the world. However, calculation of the economic cost (i.e., specific monetary value) of the GHG emissions associated with future development is not required to make a determination about the significance of such GHG emissions under CEQA. Nonetheless, the City agrees that there are economic costs associated with GHG emissions, and has identified an approach to mitigate the GHG emissions of future development (described in the response to comment B-1) that would also reduce the associated economic costs of such emissions.

substitute for a full discussion of all impacts under CEQA, an estimate of the economic costs should have been included in the EIR.

The Stern Review of the Economics of Climate Change, a comprehensive report commissioned by the British government, recently concluded that allowing current emissions trajectories to continue unabated would eventually cost the global economy between 5 to 20 percent of GDP each year within a decade, or up to \$7 trillion, and warned that these figures should be considered conservative estimates (Exhibit 7). By contrast, measures to mitigate global warming by reducing emissions were estimated to cost about one percent of global GDP each year, and could save the world up to \$2.5 trillion per year (*id.*)

T-32 If we take no action to control emissions, each ton of CO₂ that we emit now is causing damage worth at least \$85 (*id.*). The EIR's failure to include information relating to the economic cost of the project's greenhouse gas emissions renders it inadequate. Thus, even under the potentially inadequate GHG inventory conducted for the DEIR, the costs associated with the GHG emission from the General Plan Update are approximately \$1.9 billion in 2010. This is calculated using the 22.5 million tons of carbon dioxide equivalent as the city's emission forecast for 2010. (DEIR, p. 5-23)

II. THE DEIR FAILS TO ADEQUATELY DESCRIBE THE ENERGY IMPACTS OF THE GENERAL PLAN

T-33 Energy demands will increase as the population grows in San Diego. The CPAP so heavily relied upon by the DEIR states that natural gas and electricity needs will go up about three percent annually. (CPAP, Appendix J, p. 70) Thus, the GP will result in excessive amounts of energy and the DEIR fails to outline a mitigation framework for this adverse impact. CEQA requires EIRs to include a section discussing "[m]itigation measures proposed to minimize significant effects on the environment, including, but not limited to, measures to reduce the wasteful, inefficient, and unnecessary consumption of energy." Cal. Pub. Res. Code § 000(b)(3); see also Guidelines Appendix F ("Energy Conservation").

T-34 The DEIR relies on the Regional Energy Strategy (RES) to develop a vision of how energy will be produced and consumed in San Diego. The success of the RES programs mentioned in the DEIR is ambiguous. The RES target of reduction in electricity consumption to 1990 levels in 2010 is far from being met - the electricity consumption in San Diego has risen two percent since the adoption of RES in 2003 and current levels are 16 percent higher than 1990. (DEIR, p.3.14-6) Also, instead of producing more regional energy, San Diego has produced less energy in the region compared to earlier years. (DEIR, p. 3.14-6).

T-35 The DEIR also notes that the CPAP goal is to reduce GHG emission by 15 percent in 2010. Several other plans for reducing GHG emissions are also mentioned. (DEIR, p. 3.14-15) However, this part of the DEIR fails to mention that current GHG emission reductions are not enough to meet the CPAP goal and that the GP will cause increased GHG emissions. (DEIR, p. 5-26,-27) Furthermore, of the five specific actions listed that San Diego is taking to help reduce GHG emissions, only one is aimed at reducing non-municipal emissions and calls for

T-32 As discussed in response to comment T-31, CEQA Guidelines §15064(e) states that the "economic and social effects of a physical change may be used to determine that the physical change is a significant effect on the environment." The DEIR includes a discussion of the projected impacts of increased GHG emissions on the people, economy and environment of California, and concludes that the General Plan's contribution to the social and economic, as well as environmental impacts of global warming is considered cumulatively significant and unavoidable. Estimation of the economic cost of the project's estimated GHG emissions is not required to reach a conclusion regarding the significance of an environmental impact under CEQA.

T-33 See the response to comment S-8, which addresses energy impacts covered in the PEIR. The mitigation framework for energy impacts is addressed in Section 3.14.4 of the PEIR and includes the efforts and programs described in response to comment S-8, as well as the City's process for the evaluation of discretionary projects, environmental review requirements, and procedures for analysis of projects for consistency with the goals, policies and recommendations of the General Plan. The Mitigation Framework Measures listed in the PEIR include innovative project design, construction, and operations to reduce storm water pollution, energy use, and waste generation; the City's Sustainable Building Policy for expedited review time of projects proposing to meet LEED Silver rating standard for energy efficient construction and design; implementation of water and energy conservation measures beyond what is required by local, state, and federal regulations; project siting, mix of land uses, and design that reduces the need to drive, thus reducing vehicle miles traveled compared to what would occur through conventional development; and strategic planting of trees in quantities and locations that maximizes environmental benefits such as shading.

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- T-34 The continued rise in energy use since adoption of the Regional Energy Strategy (RES) in 2003 is acknowledged. However, it cannot be expected that adoption of a policy in May 2003 for energy reduction through Year 2030 would show results a few years after its adoption. Much of this growth in energy consumption is the result of development projects approved prior to adoption of the RES. The Regional Comprehensive Plan Performance Monitoring Report in 2006 is intended to identify progress in meeting RES targets so that efforts can be stepped up, such as for increased in-county generation of energy to meet 65 percent of summer peak demand by 2010, which was at 60 percent in 2005.
- T-35 As discussed in the response to comment B-1, the City's has identified an approach to meet its obligation under CEQA to examine and require feasible options for mitigating the GHG emissions of future development, including GHG emissions from both public and private projects. The City anticipates that the approach to mitigate the GHG emissions of future development would help the City achieve the CPAP goal of 15% reduction in GHG emissions by 2010.

voluntary participation by residents. As mentioned above, municipal measures are not enough to reduce GHG emissions in San Diego.

T-36

The DEIR states that compliance with current policies and regulations will substantially reduce energy impacts. (DEIR, p. 3.14-16) This statement is not validated by any facts, evidence, literature, or other support. There is no evidence that the policies and regulations that are already in place have sufficiently reduced energy demands and will mitigate the future increased energy demands resulting from implementation of the GP.

T-37

The reliance on meeting future goals or projected future plans is insufficient mitigation for the adverse impacts of the GP. The DEIR should state specific mitigation measures that will be implemented. CEQA requires EIRs to propose mitigation measures for all significant environmental impacts, and to adopt all such feasible measures that would lessen a project's impact on the environment. CEQA forbids public agencies from approving projects that will cause significant harm to the environment until and unless the agency has adopted all feasible mitigation measures. (Public Res. Code § 21002, 0 (a)) As stated by the Attorney General in reference to the San Bernardino County GP Update, the local agency "must explore all feasible mitigation that could be adopted to lessen the effects of the General Plan revision, and cannot rely upon those features of the project that are already required by law to substitute for the mitigation CEQA requires." (Exhibit , p.9) The DEIR has simply not met the mandates of CEQA with respect to Energy mitigation.

III. THE DEIR FAILS TO ADEQUATELY MITIGATE AIR QUALITY IMPACTS

T-38

The DEIR admits that air quality in San Diego does not currently meet the state one-hour standard or federal eight-hour standard for ozone. (DEIR, p. 3.2-7) The city is also not in attainment for state particulate matter standards. (DEIR, p.3.2-10) The DEIR also mentions that there has been a 65 percent increase in particulate matter in the air due to population growth and increased VMT from 1975 to 2005. (DEIR, p. 3.2-9) The expected population growth and increased VMT due to implementation of the GP will cause a further increase of particulate matter in the air. Even though the city is in non-attainment for these standards and the GP will continue to significantly impact air quality, the DEIR lists mitigation measures that "may" be implemented on a project-by-project basis. The measures listed should be made mandatory through ordinance amendments and regulations. Also, the DEIR should specify additional regulatory mitigation measures to decrease criteria pollutant emissions and address existing and predicted violations. *See, e.g.*, DEIR, p. 3.2-4 ("additional local emissions controls are needed to maintain attainment of the ozone standards in the San Diego region.")

T-39

For mitigation of impacts associated with carbon monoxide, ozone, hydrocarbons, and nitrogen and sulfur oxides, the DEIR relies on measures contained in the federal and state air quality plans such as ridesharing, transit improvements, traffic flow improvements, and bicycle facilities and programs. (DEIR, p. 3.2-14) As mentioned above, the city cannot use existing regulations as mitigation measures. Where the city is already legally obligated to undertake pollution-reducing measures, these measures should be considered to be part of the project, not as mitigation. A true mitigation measure would be to implement the above measures through binding regulations.

T-36

The PEIR acknowledges that continued effort to reduce energy consumption is needed and includes the statement that "General Plan policies and City programs would aid in reducing adverse energy impacts, but the projected population growth in the City would result in an increased demand for energy."

T-37

See response to comments S-8 and T-33. Specific mitigation cannot be provided at the Program EIR level of analysis because project- and site-specific impacts cannot be identified. In addition, future availability of alternative energy sources, the potential construction impact of these alternative sources, and feasible mitigation cannot be determined at this time.

T-38:

Table 3.2-3 of the PEIR shows the number of days that the San Diego region exceeded the state ozone standard has decreased from 148 days in 1985 to 24 days in 2000 and 12 days in 2004; and that the days above the National ozone standard has decreased from 50 days in 1985 to zero days in 2000 and one day in 2004. In spite of this progress, the PEIR also states that the region has not met "the more restrictive state one-hour ozone standard, or the federal eight-hour standard." While projected population growth will continue to result in increased automobile use and pollutant emissions, the PEIR states in Section 3.2.3 that much of the new residential development is proposed to occur around transit-accessible nodes that will relieve some of the increased automobile trips that would have otherwise occurred without alternative transportation planning in mind. It also states that transportation plans and programs associated with the Draft General Plan must conform to the purpose of the State Implementation Plan (SIP) for the attainment of the EPA-promulgated National Ambient Air Quality Standards (NAAQS). Section 3.2.4 of the PEIR also states that development that could significantly impact air quality, either individually or cumulatively, would receive entitlement only if it is conditioned with all reasonable mitigation to avoid, minimize, or offset the impact. Sufficient existing regulations and procedures exist to accomplish mitigation and no additional regulatory mitigation measures are needed.

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As also stated in the PEIR, SANDAG is responsible for developing a “Transportation Control Measures (TCM) Plan” to help achieve air quality objectives for the region. The San Diego Air Pollution Control District (APCD) adopts the TCM Plan as part of the Regional Air Quality Strategy (RAQS), which is updated on a triennial basis and outlines measures for achieving state and national air quality standards. One way to achieve the RAQS will be to implement the TCMs contained in the federal and state air quality plans such as ridesharing, transit improvements, traffic flow improvements, and bicycle facilities and programs. Traffic flow improvements will reduce the amount of pollution created by vehicle emissions by reducing the amount of time vehicles spend on roads, while ridesharing, transit improvements, and bicycle facilities and programs will reduce vehicle miles traveled. Air quality conditions can also be improved by reducing the amount of harmful emissions produced by vehicles through increased use of energy-efficient vehicles such as hybrid electric vehicles, electric vehicles, or those that run on alternative fuels. Overall, implementation of the Draft General Plan would benefit the region’s air quality by helping to relieve otherwise expected traffic congestion and by encouraging the use of more efficient transportation methods.

- T-39 The PEIR does not identify existing regulations as mitigation measures. Rather, these regulations are part of the Mitigation Framework through which future development and community plan amendments would be analyzed at a project level of analysis so that project-level mitigation measures can be identified. As stated in the introduction to Chapter 3.0 of the PEIR, standard existing regulations, requirements, programs, and procedures that are applied to all similar projects are taken into account in identifying additional project specific mitigation that may be needed to reduce significant impacts. Mitigation, in addition to measures that the lead agency will implement, can also include measures that are within the responsibility and jurisdiction of another public agency (CEQA Guidelines, Section 15091 [a] [2]).

T-40 Also, the policies listed in the conservation element of the GP have great potential for reducing air quality impacts. (DEIR, p. 3.2-15) However, they should be implemented through mandatory, binding regulations in order to be effective. Otherwise, these policies suffer from the same defect as other parts of the mitigation plan in that they utilize existing regulations and standards instead of implementing CEQA mandated mitigation measures. Furthermore, many of the mitigation measures that would apply to air quality would apply to other areas of environmental impact such as GHG emissions, water quality, and energy. For example, by creating better public transit, VMT would decrease, thereby decreasing GHG emission from vehicles, improving air quality and decreasing energy consumption.

IV. THE DEIR FAILS TO ADEQUATELY DESCRIBE THE WATER SUPPLY IMPACTS OF THE GENERAL PLAN

T-41 The DEIR states that no significant impact has been identified for water supply. However, the water supply will be significantly and adversely impacted by the GP Update. Future population growth is projected to increase water supply demand. (DEIR, p. 3.14-8) The city currently imports 90 percent of its water. (DEIR, p.3.14-2) Most of San Diego's water is purchased from the Water Authority. The key component of the Water Authority's diversification plan is seawater desalination. (DEIR, p. 3.14-1) Desalination itself is environmentally damaging and requires tremendous amounts of energy to turn salt water into fresh water. Desalination is not a reliable source of water and is merely a potential source.

In fact, all of the DEIR sources of water in case of drought or emergency rely on potential future plans. The only substantial water source is conservation and this is projected to account for merely ten percent of San Diego's annual water demands in 2020. (DEIR, p. 3.14-3) The largest use of water in California is landscape irrigation and the city of San Diego has yet to develop a strategic plan for landscape water conservation.

Disruptions in water supplies and changes in the snow pack due to global warming will only add to the problems facing San Diego's water supply. Increased temperatures will cause more demand for water and rising sea levels will contaminate the existing water supply San Diego relies upon.

T-42 The future increased demand for water and the predicted effects of global warming on water supply will substantially effect the environment in San Diego. Drought will cause distress to biological wildlife and fauna; adversely impact agriculture and other areas of the economy; and decrease the availability of hydropower production. This amounts to a significant adverse environmental effect and should be fully analyzed in the DEIR with adequate mitigation measures.

V. THE DEIR INADEQUATELY DESCRIBES MITIGATION MEASURES FOR MOST ENVIRONMENTAL IMPACTS

As discussed above in the context of GHG emissions, the mitigation measures outlined in the DEIR largely rely upon existing regulations at the state or federal level. However, after a

T-40 See response to comments T-38 and T-39. Federal, state, and regional agency regulations and programs, as well as compliance with Conservation Element and other General Plan policies, would be applied at the subsequent project level of analysis to avoid or mitigate specific project impacts.

T-41- T-42 An analysis of the project's impact on the City's water supply is found within the Public Utilities Section of the PEIR Section 3.14.3 along with a description of the measures to be taken to address catastrophic water shortages and drought management planning. Additional information was added to the PEIR regarding recent court cases which may affect our water supply; and additional policies were included within the Draft General Plan to augment the contingency plans for the City. As stated in the PEIR, the City has the ability to condition development to avoid, minimize, or offset impacts to the water supply should unforeseen water shortages occur. Please also see response to comment S-29.

A discussion of Global Warming impacts is included within the Cumulative Impacts Section 5.0 of the PEIR. Implementation of the Draft General Plan policies and ongoing City programs, as well as continual updates to the Urban Water Management Plan would enable the City, to the extent feasible, to address short-term and long-term water supply needs.

With regards to landscape water conservation and irrigation management, the City of San Diego began developing and implementing landscape conservation programs in response to the 1997 Strategic Plan for Water Supply. With the aid of a couple of City-developed tools on the internet and via GIS and satellite maps, customers with large landscaped areas have been surveyed and issued water budgets and irrigation schedules. Single-family residential customers have been given irrigations schedules based on plant evapotranspiration since 1992. The Web-based Landscape Watering Calculator has helped numerous customers in Southern California manage their irrigation schedules with an easy to use program. The City is also an active participant in the drafting of the model regional landscape ordinance in San Diego as required by AB 1881.

long analysis of the effectiveness of these regulations, the DEIR then states that these regulations are not mitigation and that future measures may be needed but are not appropriate at the program level. A few additional examples of the DEIR' language are given below. From the Water Quality section:

T-43 Because the degree of future impacts and applicability, feasibility, and success of future mitigation measures cannot be adequately known for each specific future project at this program level of analysis, the program-level impacts related to water quality remains significant and unavoidable.

(DEIR, p. 3.17-10) Also, similar language is found in the Air Quality section:

T-44 However, it is possible that for certain projects, adherence to the regulations may not adequately protect air quality, and such projects would require additional measures to avoid or reduce significant air quality impacts. These additional measures would be considered mitigation. For each future project requiring mitigation (i.e., measures that go beyond what is required by existing regulations), site-specific measures will be identified that reduce significant project level impacts to less than significant or the project level impact may remain significant and unavoidable where no feasible mitigation exists.

(DEIR, p. 3.2-17,18) In the Hydrology section:

T-45 Compliance with the standards is required of all projects and is not considered to be mitigation. However, it is possible that for certain projects, adherence to the regulations may not adequately avoid or reduce impacts, and such projects would require additional measures. These additional measures would be considered for each future discretionary project requiring mitigation (i.e., measures that go beyond what is required by existing regulations). Site-specific measures will be identified that reduce significant project level impacts to less than significant or the project level impact may remain significant and unavoidable where no feasible mitigation exists.

(DEIR, p. 3.7-5) The Public Utilities section acknowledges that future growth is expected, and the GP and DEIR rely on statistics that predict a three percent annual growth in energy demand in both natural gas and electricity in three different sectors. However, the DEIR claims this is not enough information upon which to decide mitigation measures:

T-46 No specific projects or actions have been identified with the Draft General Plan that would result in any direct or indirect physical change in the environment. However, future growth is anticipated

T-43 - T-47 See response to comments T-38 and T-39. Because no specific land development or community plan amendments projects are included in the Draft General Plan, mitigation measures to avoid or reduce significant impacts of future projects cannot be identified at this time. The methodology of using federal, state, regional, and City regulations and programs to evaluate potential impacts related to water quality, air quality, hydrology, public utilities, as well as water supply and energy provides an analytical mitigation framework to avoid or mitigate impacts at the subsequent project level of environmental analysis.

and the construction of future public utilities needed to support that growth may result in environmental impacts. Therefore, impacts associated with the construction of public utilities may occur and even though potential mitigation framework measures have been identified, those impacts remain significant and unavoidable.

T-47 (DEIR, p. 3.14-16, 17) Contrary to the conclusion reached overwhelmingly in the DEIR, detailed impacts analysis and mitigation can and should occur now, at the GP Update stage, and not at some future time when projects are addressed piecemeal and have bureaucratic and financial momentum behind them. At this programmatic level, the City has more than adequate information upon which to design mitigation measures to address the foreseeable and acknowledged environmental consequences of the GP Update. The GP will result in growth that will inevitably put a strain on water supply and energy. Future growth will create increased VMT, energy use, air pollution and GHG emissions. However, the DEIR fails to outline any specific mitigation measures aimed at these impacts. The DEIR instead appears to schizophrenically rely on existing regulations for mitigation and then denounce that such compliance constitutes mitigation. Providing for mitigation measures at the GP level is not only beneficial because it would create uniformity and predictability for future projects, but it is the only means of truly mitigating future impacts, particularly when cumulative. As CEQA Guidelines Section 15130 (c) aptly notes, “[w]ith some projects, the only feasible mitigation for cumulative impacts may involve the adoption of ordinances or regulations rather than the imposition of conditions on a project-by-project basis.”

VI. THE GENERAL PLAN SHOULD INSTITUTE MANDATORY MEASURES TO ENSURE THAT THE GENERAL PLAN POLICY GOALS ARE MET

T-48 As mentioned above, the overwhelming reliance upon existing plans and policies for mitigation within the DEIR is inadequate. Because the policies in the GP are not enforceable requirements, they do not constitute mitigation under CEQA. The GP and DEIR’s consistent failure to implement any specific regulations results in not only insufficient mitigation but also virtually ensures that the policy goals of the GP will have no force.

T-49 The DEIR Land Use section articulates the importance of adopting specific mandatory measures at the General Plan level. The DEIR initially states that existing and future regulations will provide development standards. (DEIR, Significant Unmitigated Impacts Section, p. 6) More specifically, the DEIR Land Use section states that as community plans are updated, the Land Development Code (LDC) regulations will be used to achieve the desired community plan land use, design, and public benefits. (DEIR, p. 3.8-28) These LDC regulations are necessary to ensure that the GP or community plan policies are carried out. As explained in the DEIR, the development process is a discretionary review process that involves balancing of competing interests. (DEIR, p. 3.8-29) During the development review process, community plans will be the authority on land use density and site specific recommendations. (DEIR, p. 3.8-29) If the GP and community plan policies are inconsistent, it will be up to decision makers to balance these interests. Furthermore, during this review process, all of the competing interests will be resolved by the decision makers. Therefore, in order to ensure consistent implementation of GHG

T-48 See response to comment B-1.

T-49 See response to comments B-1, N-4, N-6, and P-3.

reduction measures at the community plan and project approval level, specific and mandatory regulations are needed at the GP level.

VII. CONCLUSION

T-50

The GP Update presents an incredible opportunity for the City to plan for a future that protects public health, the environment and quality of life. Unfortunately, as drafted, it lacks substance and vision, which can only be remedied by full compliance with CEQA and comprehensive analysis and mitigation of the GP Update's significant environmental impacts, including GHG emissions. The DEIR includes some compelling information and disclosure of some of the GP Updates' environmental impacts, but follows up with woefully inadequate mitigation measures or none at all. These deficiencies must be addressed. Thank you for your time and consideration of these comments. The Center looks forward to reviewing a revised DEIR for the San Diego GP Update that responds to its concerns.

Sincerely,

/s/ Livia Borak
 Livia Borak
 Legal Intern
 Center for Biological Diversity

LIST OF ATTACHED EXHIBITS (108 pages)

Exhibit 1. California Attorney General, San Bernardino General Plan DEIR Comment Letter (October 23, 2006).

Exhibit 2. California Attorney General, Petition filed in *People of the State of California ex rel. Attorney General Edmund G. Brown v. County of San Bernardino*, Case No. SS 700329 (San Bernardino County Superior Court) (filed April 12, 2007) (challenge to San Bernardino General Plan Update in part for failure to analyze and mitigate global warming impacts).

Exhibit 3. *IT WON'T BE EASY BEING GREEN: Berkeley sets tough course for its residents to follow to help reduce emissions of greenhouse gases in city* available at <http://www.sfgate.com/cgi-bin/article.cgi?f=/c/a/2007/05/24/MNGJ5Q0N671.DTL&hw=it+won%27t+be+easy+being+green&sn=004&sc=607>; City of Berkeley, Measure G.

Exhibit 4. Green Communities, Online Green Criteria Checklist, available at http://www.greencommunitiesonline.org/documents/green_criteria_checklist.pdf

Exhibit 5. San Diego City Attorney, *Interim Report No. 11, A Call to Action: City of San Diego Must Prepare Its Infrastructure to Withstand Anticipated Impacts From Global Warming*, Report of the San Diego City Attorney, Michael J. Aguirre (August 31, 2006).

T-50 See response to comment B-1 & CC-1, and the MMRP which lists the applicable General Plan policies.

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Exhibit 6. Stern, Sir Nicholas, Stern Review: The Economics of Climate Change (October 30, 2006) (Executive Summary and Press Notice), available at http://www.hm-treasury.gov.uk/independent_reviews/stern_review_economics_climate_change/sternreview_index.cfm.



San Diego County Archaeological Society, Inc.

Environmental Review Committee

9 June 2007

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

Subject: Draft Program Environmental Impact Report
Draft General Plan
Project No. 104495

Dear Ms. Mirrasoul:

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

Based on the information contained in the documents provided, we have the following comments on Section 3.6. We will not comment on purely editorial items like typographical errors, trusting that the City will have the section proofread again before the document is finalized.

- U-1** 1. Section 3.6.3 includes a list of policies related to historical resources that are included in the General Plan. The nine items listed there do not include a policy to require and ensure curation of archaeological collections resulting from the City's CEQA process. The City has a significant backlog of uncured collections and currently has difficulty identifying which projects generated collections and what the curation status of those collections is. The General Plan, which apparently needs to be modified to address curation, would be a good place to put some emphasis on the overdue resolution of the situation.
- U-2** 2. In several locations in Section 3.6.4, in 2.a on page 3.6-10 and 2.c on page 3.6-13, the expression used is "Prior to issuance of any permits, including but not limited to..." Does "any permits" include ministerial permits?
- U-3** 3. In 2.a on page 3.6-10, the HABS and HAER standards are invoked. To address historic landscapes, the Historic American Landscape Survey, or HALS, should also be cited.
- U-4** 4. In 1.(b) on page 3.6-11 and 1.(b) on page 3.6-14, should digital as well as Xerox copies of photos be submitted?
- U-5** 5. In 1.(b) and 2.(b) on page 3.6-11 and 1.(b) and 2.(b) on page 3.6-14, we suggest that "and other historical society or group" be changed to "and any other appropriate historical societies or groups".

- U-1 The requirement for permanent curation of archaeological artifact collections and associated research materials, including collections held by the City is included in General Plan Policy HP-A.4.
- U-2 The reference is to discretionary permits and does not include ministerial permits. Ministerial permits include, but are not limited to grading, demolition and/or building permits. In addition, the referenced mitigation program has been updated and revised to reflect recent changes and to provide consistency with other historical resource mitigation programs. Please see also response to comment W-2.
- U-3 HABS and HAER Standards would be applied when a project includes a property that is listed on the National Register of Historical Places and an adverse effect has been identified. However, for locally designated properties, any level of HABS and/or HAER Standards can be applied depending on the level of documentation required to reduce potential impacts to historical resources. As such, the Historic American Landscape Survey (HALS) has been added to the list of applicable documentation programs to be implemented when such a resource type is identified on a project.
- U-4 The recommendation for submittal of digital photographs as part of the documentation plan has been added to the referenced section of the Mitigation Monitoring and Reporting Program.
- U-5 The referenced section of the Mitigation Monitoring and Reporting Program has been revised as recommended.

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- U-6** 6. In 5 on page 3.6-11, change "following measure should be included" to "following measures are to be included". Presumably this is a requirement and not a recommendation.
- U-7** 7. On pages 3.6-12, 3.6-15 and 3.6-21, there is a standard paragraph for "Night Work". Should this be "Night and Weekend Work"? And in a.(2) in all three cases, it seems "by 9AM the following morning" should be "by 9am the morning of the next business day."
- U-8** 8. On page 3.6-15, in the fourth line of the paragraph beginning "Prior to issuance of any permit", we suggest adding "but are not limited to" between "Sites may include" and "residential and commercial".
- U-9** 9. On pages 3.6-15 and 16, under "Step 1 – Initial Evaluation", it would be appropriate to also explicitly cite Sanborn maps, aerial photographs and historic maps as resources that should be checked in addition to the records search at SCIC.
- U-10** 10. On page 3.6-16, under "Step 2 – Testing", the City needs to state unequivocally that collections from the testing phase are to be curated. This needs to be done regardless of the determination of site significance. Since all sites are considered significant at least until they are tested and proven otherwise, the testing is mitigating the adverse impacts to those sites determined to require no further investigation. Further, those testing collections constitute the only record, other than a report, that will remain for those sites. And professional ethics (see Section V of the Register of Professional Archaeologists' Code of Conduct, at <http://www.rpanet.org/conduct.htm> require curation as well.
- U-11** 11. The first full paragraph on page 3.6-17 calls for collections to be "permanently curated with an appropriate institution." This is unnecessarily vague. The paragraph should invoke the State of California *Guidelines for the Curation of Archaeological Collections*, dated May 7, 1993, and/or the federal requirements given in 36CFR79. And in the next paragraph on that page, it mentions "curation arrangements at an approved facility." Approved how and by whom?
- U-12** 12. In II.B.1 on page 3.6-18, reference is made to "The qualified Archaeologist". This should probably say "An archaeologist qualified in accordance with _____", to make the term clear.
- U-13** 13. On page 3.6-23, in paragraph 2, shouldn't the text read "Notice of Completion or release of the grading bond, as applicable,"?
- U-14** 14. To Section 3.6.5 on page 3.6-23, we would suggest adding a statement that sites that have not been tested are considered significant.

SDCAS appreciates this opportunity to review and comment on this important document.

Sincerely,


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

cc: SDCAS President
File

P.O. Box 81106 • San Diego, CA 92138-1106 • (619) 538-0936

- U-6** The comment refers to a statement at the beginning of the Treatment Plan portion of the MMRP which was intended as a note to staff to include the project specific Treatment Plan at that point in the MMRP. The Treatment Plan details the measures required by which the resource would be protected before, during and after the construction phase of the project. As such, the MMRP staff reference note has been removed from EIR text.
- U-7** Staff concurs with the recommendation to include weekend work in the referenced sections of all applicable MMRP programs and will insert the recommended language for notification by 9 AM the morning of the next business day as suggested.
- U-8** Staff concurs with the recommendation to insert the language "but are not limited to" in the paragraph as suggested.
- U-9** Staff concurs with the recommendation to include Sanborn Maps, aerial photographs and historic maps as resources to be used during the Step 1 – Initial Evaluation Process.
- U-10** The following language has been inserted into Step 2 – *Testing and will be included in the update for the Historical Resources Guidelines: Resources found to be non-significant as a result of a survey and/or assessment will require no further work beyond documentation of the resources on the appropriate DPR site forms and inclusion of results in the survey and/or assessment report. The City of San Diego will consider the appropriate treatment of materials recovered from non-significant sites as part of the update to the Historical Resources Guidelines.*
- U-11** The referenced paragraph has been revised to include a statement requiring conformance with the City's Historical Resources Guidelines (April 2001), the State of California Office of Historic Preservation's Guidelines for the Curation of Archaeological Collections (1993), and federal regulations, when applicable. In addition, the second referenced paragraph has been revised and the following sentence inserted to clarify the curation process after completion of the archaeological program: *Arrangements for long-*

COMMENTS

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term curation must be established between the applicant/property owner and the consultant prior to the initiation of the field reconnaissance, and must be included in the archaeological survey, testing and/or data recovery report submitted to the City for review and approval.

- U-12 Please refer to Section I.B.1 of the MMRP on Page 3.6-17. All individuals involved in the monitoring program must be identified prior to permit issuance. This includes verification by City staff that each individual is qualified to participate in the archaeological program as defined in the Historical Resources Guidelines. Individuals not meeting the criteria set forth in the Guidelines are not allowed to participate in the monitoring program. Therefore, revisions to Section II.B.1 of the MMRP are not necessary.
- U-13 The referenced section of the MMRP has been revised as follows: The RE shall, in no case, issue the Notice of Completion and/or release the performance bond for grading until receiving a copy of the approved Final Monitoring Report from the City's Mitigation Monitoring and Coordination section which includes the Acceptance Verification from the curation institution.
- U-14 Staff concurs with the statement that sites not tested are considered significant. As such, the following language has been added to the second paragraph on Page 3.6-9 at the end of the first sentence: *It should be noted, that recorded sites which have not been tested are considered significant and would require further evaluation prior to project approval.*

COMMENTS

RESPONSES

COURTNEY ANN COYLE
1609 Soledad Ave
La Jolla, California 92037

Re: Community Plan Area/City Council Districts: All Project No. 101495,
SCH. So 2006091032 Draft Program Environmental Impact Report (PEIR)

Dear Courtney,

V-1 I have looked at the referenced Program Environmental Impact Report. The one area I would like to comment on is the Biological Resources. Why don't the Planners/Managers or whoever it is that lays out such guidelines bring Biological and Pre-History Archeology together?

V-2 I would like to see the day come that will remove the word "Mitigation" from all planning documents and just require developers to design the construction of projects to avoid impacts to wildlife and Pre-History sites. The City should require not only the protection of all wetlands and vernal pool but also require the prevention of disturbances to Pre-History Human Remains as well.

V-3 Why can not the City require that a special funding account be established by all developers that they be required to place 1% of the total cost of the planned development cost into a Preservation of Pre-History Account. That money should only be drawn down when Pre-History Human Remains have been inadvertently discovered after construction has begun and only as a last resort the Human Remains have to be removed if the project can not be redesigned. The money that would be drawn down from the account would be put to use to do Honest Archeology to record the pre-history site and remove the human remains in a respectful manner that meets all the spiritual needs that the Most Likely Descendant may require.

V-1 Although biology and archaeology are two distinct disciplines requiring specialized expertise when evaluating potential impacts, the relationship between the two is generally addressed when analyzing existing site conditions as part of the environmental setting. When appropriate, archaeobotany would be included in the analysis and taken into consideration when conducting background research. If a site is determined to be significant, specific research questions would be addressed in the research design and data recovery program relating to the flora and fauna onsite as well as the ethnohistoric uses of those resources.

V-2 The SB 18 process is intended to provide the Native American community with the earliest possible opportunity to address potential impacts to archaeological resources for community plan amendments and open space issues. With SB18, project applicants and Native American representatives can work together to identify areas of Native American concern prior to project submittal with a design that avoids and/or preserves potentially sensitive resources. For projects that are not subject to SB 18, CEQA and the Public Resources Code provide provisions for the treatment and disposition of human remains encountered during construction related activities. These provisions have been incorporated into the City's Historical Resources Regulations, Guidelines and Mitigation, Monitoring and Reporting Programs. In addition, environmental staff procedures have been improved to identify areas of high sensitivity earlier in the Initial Study process which would provide the opportunity for avoidance, preservation and/or redesign.

V-3 A public agency does not have unlimited authority to impose mitigation measures or require new fees on a project; rather, an agency may exercise only those express or implied powers provided by law. In addition, the U.S. Constitution limit's an agency's authority to impose conditions to those situations where there is a clear "nexus" between the impact and the mitigation measure and/or fee being required. Mitigation proposed for a project must relate directly to the impacts caused by the project

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and therefore cannot be required for all development projects. There must be “rough proportionality” between the environmental problems caused by a development project and the mitigation measure and/or fee imposed on the project applicant. Furthermore, according to California Government Code Section(s) 66016-66018.5, a legislative action is required in order for the City to levy new fees.

COMMENTS

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- V-4 Under the Historical Resources section, I would like to see some language that the City acknowledges that the Bulldozers of Years of Development in the past 100 years of San Diego's growth has destroyed untold number of Pre-History and Human Remains that are the roots to San Diego's history. The Archeological Resource Business's have learned over the past thirty years of digging in San Diego County that Rich Midden Soil has a high potential for encountering human remains during construction development activities. Therefore in an honest effort for modern society to except and respect a moral obligation that will respect and honor the Pre-History Human Remains and the rich history of San Diego the General Plan will require that the use of Canine Forensics that have been trained in the detection of locating Pre-History Human Remains when the Cultural Management Company's know from pedestrians surveys that the development project will impact midden soil. In the event that the Canine Forensics dogs alert to the location of Human Remains, the Remains will not be removed but the project will be redesigned to avoid those remains and the accompanying archeological resources. The City's General Plan should require rather than "include Native American Monitors" during all Pre-History pedestrians surveys and the all Cultural Management fieldwork.
- V-5
- V-6

As always, I hope that the above is helpful and thank you for all you do.
Sincerely,



CARMEN LUCAS
Kwaagmii, Laguna Band of Indians
Laguna Mountain, California

Copy to:
Larry Myers, Native American Heritage Commission

- V-4 The City acknowledges that development over the past 100 years has resulted in the destruction of numerous historic and prehistoric archaeological sites in San Diego. However, the General Plan is not the vehicle for expressing views or opinions on past activities. The General Plan is intended to provide policy statements and goals for improving the planning process on a citywide basis. The California Environmental Quality Act (CEQA) has been in place since 1970 which provides the mechanism for a more thorough analysis of potential impacts, and includes the 1989 requirement that public agencies adopt specific measures in accordance with Public Resources Code Section 21081.6 to mitigate or avoid significant effects on the environment. In addition, the City's Historical Resources Regulation and Guidelines provides additional direction for the treatment of archaeological resources in accordance with all applicable state and federal laws.
- V-5 The City does not object to using non-invasive methods as a component of the initial archaeological investigation but we cannot require the use of one particular methodology. While non-invasive methods are used as a tool for locating potential subsurface components of an archaeological site, they cannot be relied upon to determine the type of resource identified and the significance of the find without further investigation. The subsurface investigation of anomalies identified with the non-invasive methodology may include a small post-hole or shovel test pit and would be consistent with standard archaeological practices. Page 21 of the City's Historical Resources Guidelines further states that consultants are encouraged to employ innovative survey techniques when conducting enhanced reconnaissance including but not limited to, remote sensing, ground penetrating radar and other soil resistivity techniques as determined on a case-by-case basis.
- V-6 The proposed General Plan has been revised as recommended.

COURTNEY ANN COYLE
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Marilyn Mirrasoul, Environmental Planner
City of San Diego Development Services
1222 First Avenue, MS 501
San Diego, CA 92101

June 25, 2007

Re: General Plan and Draft Program EIR, Project No. 104-95 - SCH 2006091032

Dear Ms. Mirrasoul:

We submit these comments on the City of San Diego's General Plan and Programmatic DEIR on behalf of Carmen Lucas, waaymii Laguna Band of Indians. This letter supplements the letter from Ms. Lucas dated June 15, 2007, both faxed separately and attached hereto.

While we may have comments regarding other portions of the documents, we will focus our attention here on those sections relating to the Historic Preservation Element and its section of the PDEIR. Both these, and additional comments, may be conveyed to the City during upcoming SB 18 consultative meetings.

The summary for the PDEIR states that, "Implementation of the Draft General Plan *could* result in significant impacts to historic resources associated with the built environment through substantial alteration, relocation, or demolition of historic buildings, structures, objects, landscapes, and sites and to important archaeological sites that occur on property proposed for development, including construction activities, such as grading and excavation. Additionally, the *potential* for encountering human remains during construction development activities *is possible* and impacts to human remains as a result of the Draft General Plan *may* occur. (Emphases added)."

The PDEER summary also states that, "Although significant impacts to historical resources *may* be mitigated through review of discretionary projects, specific mitigation at the Program EIR level is not available since specific development projects are not known."

W-1 First, even if specific development projects are not known, the City can and should devise an improved tool box for mitigating impacts to archaeological sites and tribally significant properties than it has now, which will then serve to help reduce

W-1 The City does rely on a toolbox of options for addressing archaeological sites and traditional cultural properties. Improvements are made to these options as new information is gleaned or new technologies are developed. The proposed General Plan addresses surveys, nominations, districts, curation, mitigation, and other issues in the Historic Preservation Element policies.

COMMENTS

RESPONSES

W-2

impacts in the future. This should include goals and targets for surveys, nominations, districts, curated collections and monitoring, among others. Second, significant impacts to archaeological sites and tribally significant sites that may occur through the application of what the City deems "ministerial" or maintenance projects have not been addressed. Third, it is a commonly held belief among tribes that impacts to sacred places and ancestral burials cannot be mitigated and that avoidance must occur whenever possible. Finally, what are the significant changes from the existing Progress Guide and General Plan relative to Cultural Resources and the proposed plan?

W-3

W-4

Comments on the Draft Historic Preservation Element

While there are certainly many laudable policies outlined in the Plan, we make the following recommendations:

W-5

* State Laws Summary Page HP-5 (and DEIR 3.6-6): The section of the Public Resources Code creating the Native American Heritage Commission (PRC section 5097.9 et seq.) and outlining its duties should be described, particularly where reference is made to the NAHC within the City's standard mitigation measures at PDEIR page 3.6-20. Moreover, mention should be made of the NAHC's Sacred Places List and also specifically to PRC Section 5097.9 which states:

No public agency, and no private party using or occupying public property, or operating on public property, under a public license, permit, grant, lease, or contract made on or after July 1, 1977, shall in any manner whatsoever interfere with the free expression or exercise of Native American religion as provided in the United States Constitution and the California Constitution; nor shall any such agency or party cause severe or irreparable damage to any Native American sanctified cemetery, place of worship, religious or ceremonial site, or sacred shrine located on public property, except on a clear and convincing showing that the public interest and necessity so require. The provisions of this chapter shall be enforced by the commission, pursuant to Sections 5097.94 and 5097.97.

The provisions of this chapter shall not be construed to limit the requirements of the Environmental Quality Act of 1970, Division 13 (commencing with Section 21000). The public property of all cities, counties, and city and county located within the limits of the city, county, and city and county, except for all parklands in excess of 100 acres, shall be exempt from the provisions of this chapter. Nothing in this section shall, however, nullify protections for Indian cemeteries under other statutes.

W-6

* History of Preservation Planning HP-10-11: We believe that many of the shortfalls identified in the 1979 City of San Diego Progress Guide and General Plan remain true today including the lack of comprehensive citywide archaeological site and tribally significant property surveys and the need for a

W-2 Ministerial projects are not subject to CEQA. The Historical Resources Guidelines of the Land Development Code requires the City to determine the need for a site specific survey for both discretionary and ministerial projects, based on the Historical Resource Sensitivity Maps. Maintenance activities can be either ministerial or discretionary depending on the scope of the maintenance and location of the project.

W-3 Comment noted. The City of San Diego Land Development Code Section 143.0252 requires all feasible measures to protect and preserve any traditional cultural property be included as a condition of development, except as may be approved through the deviation process (Section 143.0260).

W-4 This comment does not address the adequacy of the Draft EIR. A table of existing policies of the Progress Guide and General Plan with a reference to the proposed General Plan has been provided to the commenter separately and is available on request.

W-5 The proposed General Plan discussion of state laws is not intended to be all inclusive. Additional general language addressing the comment has been added to the discussion.

W-6 Comment noted. It does not address the adequacy of the Draft EIR.

COMMENTS

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stronger organizational framework with adequate personnel. Both shortfalls should be more clearly addressed in the Policy Statements. We also disagree with the statement that existing regulations and associated guidelines have proven to be effective in the protection and management of historical resources in San Diego. As can be seen by suggestions below, additional work is needed, particularly with regard to tribal resources.

W-7

Protection of Ancestral Native Burials Language: Language must be put into the Plan acknowledging tribal views toward the necessity for the protection and preservation of their ancestral human remains *in situ* on both publicly and privately owned lands. One place to do this is at page HP-11 in the paragraph discussing consultation. Also, consideration must be given in handling ancestral human remains, that the affiliated people may not desire scientific or other testing of these remains, and that these views should be respected, wherever possible.

W-8

Fully Integrate Tribal Concerns in the Larger Land Use Planning Process HP-A.2.: The need to meaningfully consult with tribes early in the land use planning and project level processes and to flag areas of sensitivity to them during the permitting and environmental review processes must be integrated into this Policy and the City's mitigation measures. This must include the consideration of avoidance and project redesign at a time in the project when these objectives can be achieved. Without these specific actions, tribal resources will continue to be needlessly lost and their impacts unmitigated in San Diego.

W-9

San Diego Historical Organizations Page HP-16: the San Diego Archaeological Center should be listed and SOHO's spelling should be corrected to: Organisation.

Comments on the PDEIR Historical (Cultural) Resources Section

W-10

The document, while concise and easy to read, does not make *any* attempt to offer mitigation for the Plan. Nor does it include a meaningful Alternative that reduces impacts and effects to archaeological sites and tribally significant properties.

W-11

Prehistoric Period PDEIR 3.6-1: We believe that the term Creation Story is preferable to the term "myth," which can carry a pejorative meaning. More should be said in this brief one-page summary of the metaphysical nature of these people, their artistic and manufacturing abilities to make a living as well as objects of great spiritual meaning, the care given to the treatment of their dead and how these belief systems and activities are reflected in the City's landform today.

W-12

Thresholds of Significance PDEIR 3.6-7: First, to better reflect both NHPA and CEQA, revise the first bullet to read: "Results in adverse physical, indirect or aesthetic effects to . . ." Second, the PDEIR at 3.6-8 states that, "Archaeological resources may be difficult to detect prior to construction activities. . ."

W-13

Accordingly, the impacts section of the PDEIR should mention the need Oil a case

W-7

Additional general language addressing the comment has been added to the proposed General Plan discussion.

W-8

Additional language addressing the comment has been added to the proposed General Plan Policy HP-A.2.b.

W-9

Comment noted. The recommended changes to the proposed General Plan have been made.

W-10

As stated on Page 3.6-9 of the General Plan EIR, Section 3.6.4 provides a Mitigation Framework (Section 3.6.4) which includes goals, policies and recommendations combined with other federal and state laws to ensure project level historical resources mitigation for future discretionary projects. This section includes examples of project level mitigation in accordance with CEQA and the City's Historical Resources Guidelines. Project level mitigation would be developed based on the results of technical studies prepared by qualified historical resources consultants in accordance with the City's Guidelines.

W-11

The term "myths" has been revised to read "Creation Story" in the first paragraph of the Prehistoric Period discussion on Page 3.6-1 of the EIR as recommended.

W-12

The Threshold statement comes directly from the City's Initial Study Checklist. The term "indirect" has been added to the referenced bullet under Section 3.6.2, Thresholds of Significance on Page 3.6-7 of the EIR.

W-13

Please see response to comment V-5. Additional language has been added to the Mitigation Framework Section (specifically within Steps 1 and 2) encouraging the use of non-invasive field methods during the initial archeological investigation phase.

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by case basis for testing and encourage the use of noninvasive techniques such as ground penetrating radar, canine forensics, etc., as technologies develop, so that sites may be better understood, avoided and treated in a culturally sensitive manner. Third, the PDEIR at 6.6-8 states that "Previously excavated areas are generally considered to have a low potential for archaeological resources . . ." However, ancestral human remains have been found in several locations in District 1 in fill dirt; this indicates that human remains are being excavated from one location and used as fill on other sites. The PDEIR fails to address this practice.

W-14

▪ **Mitigation Framework** PDEIR 3.6-9: The PDEIR states that " . . . at the time of this writing, these [standard mitigation] measures are generally considered to be adequate mitigation." What is the basis for this determination? For the last three years or more, tribal entities have come to the City to report the inadequacies of its environmental and development review processes, mitigation and monitoring program and regulatory framework to address ongoing, unmitigated and unacceptable impacts to tribal cultural resources. This includes private and public projects within the recorded Spindrift archaeological site. Many of the tribal concerns remain unaddressed, such as the illegal export of soil with ancestral human remains to be used as fill dirt elsewhere in the City.

W-15

The PDEIR also states that, "Future projects would be subject to site-specific measures in effect at the time the projects are processed." It is our experience that Development Sendees tends to only use its standard mitigation measures - even when the site is anything but standard; how projects have been treated in recent years at the Spindrift archaeological site is a glaring example. What specific measures is the City taking to improve and tailor its avoidance, project redesign and mitigation measures toolbox for these irremediable resources?

W-16

Areas of weakness in the current implementation of the City's Mitigation Framework include: Initial Evaluation, Testing, Data Recovery, Monitoring, Human Remains Discovery and Post Construction Programs.

W-17

Regarding Initial Evaluation, the PDEIR fails to state that only qualified individuals should do the surveys, evaluation and records searches and that records searches include the Native American Heritage Commission (sacred lands list), the Museum of Man (early site records), the San Diego Archaeological Center (existing collections) and any tribal repositories or museums. Moreover, surveys to assess the likelihood of subsurface prehistoric resources or a traditional cultural property must require the presence of tribal monitors. The monitor must also be involved in making the initial significance determinations under CEQA.

W-18

Regarding **Testing**, it should be revised to state that tribal monitors be present during testing of prehistoric sites. PDEIR 3.6-16 states that, "If significant resources are discovered during the testing program, then data recovery shall be undertaken prior to construction." This measure should be revised to state that "If

W-19

4

W-14 The City agrees that in some cases the potential still exists for archaeological resources to be encountered in previously excavated or graded areas. As such, language has been added to the second paragraph on Page 3.6-8 addressing the need for further review of projects located within recorded archaeological sites or identified as traditional cultural properties in areas that have been previously excavated and/or graded.

W-15 The Mitigation Framework within the Historical Resources Section of the DEIR includes a series of steps to be followed by environmental staff to determine the likelihood for a proposed project site to contain historical resources. These steps provide the necessary tools (including archaeological sensitivity maps, survey and testing results reports, etc.) for City staff to identify potential issues related to archaeology and the built environment early in the CEQA process. Confidential archaeological site data is also available from qualified City staff which is used to assist the environmental analysts in determining the need for additional investigative work on the project site. Tribal concerns referenced in the comment letter are being addressed by the Mayor's Office.

W-16 Please see response to comments W-13 and V-5.

W-17 The Initial Evaluation has been revised to include the recommended sources for background information when conducting initial archeological evaluations, and the requirement that individuals conducting any phase of the archaeological program must meet the qualifications in accordance with the City's Historical Resources Guidelines.

W-18 The requirement for Native American participation in all phases of the archaeological program is supported by the City and has been included in the General Plan and EIR. The Historical Resources Guidelines will also be revised to reflect this commitment by the City.

W-19 Step 2 – Testing has been revised to include a statement indicating that the testing program may require reevaluation of the proposed project in consultation with the Native American representative

COMMENTS

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significant resources are discovered during the testing program, then project reassessment will occur which may involve some combination of tribal consultation, project redesign and data recovery prior to construction."

W-20 Regarding Data Recovery, the PDEIR 3.6-16 states that, "For any site determined to be significant, a Research Design and Data Recovery Program shall be prepared . . ." This section should also state that: for data recovery of prehistoric materials that the presence of a tribal monitor is required, all bone will be timely identified, and the tribal monitor will be consulted on the preparation of the Data Recovery Report. Finally, the PDEIR 3.6-17 states that "Any human bones and associated grave goods of Native American origin shall, upon consultation, be turned over to the appropriate Native American group for repatriation and not dictate how the tribal group handles its repatriation."

W-21 This should be revised to state that the items be turned over for repatriation and not dictate how the tribal group handles its repatriation.

W-22 Regarding the Discovery of Human Remains, the PDEIR 3.6-20 does not appear to reflect recent changes in the Public Resources Code pursuant to AB 2641 (2006). These include that: after the NAHC has notified the Most Likely Descendant (MLD) of the discovery, the MLD has 48 hours from gaining access to the property to inspect the remains and make recommendations for treatment, if the MLD completes the site inspection and makes a recommendation within 48 hours the parties involved will discuss and confer about all reasonable options for treatment of the remains and this time period can be extended by the parties involved especially if multiple burials are discovered and lists specific mechanisms to better protect onsite reinterments such as recording the site with the NAHC or Information Center, using an open space easement or conservation zone or recording a document with the County. Accordingly, this section of the PDEIR and City's standard mitigation measures must be updated.

W-23 Regarding Post Construction Programs, the PDEIR 3.6-22 directs that sites be recorded on the State of California Department of Parks and Recreation forms; this section should also refer to completing the Sacred Place List forms at the NAHC, as applicable. Finally, the curation of artifacts section should clearly indicate that the costs of curation are borne by the project applicant

Significance of Impact within Mitigation Framework:

W-25 It appears that in a rush to override, that mitigation measures for many sections, including the Historic Preservation Element, have not been adequately considered or developed to help mitigate the significant impacts of the Plan or subsequent projects. This is contrary to the very purpose of General Planning and Programmatic environmental documents. The PDEIR should include additional programmatic or standard mitigation measures, some outlined in this letter, and the documents should make clear that future environmental analysis will then be assessed and conducted on a project level basis for all development. The notes and references section also should cite to additional sources of authority under the CEQA and other Guidance, such as National Park Service

W-26

W-27

which could result in a combination of project redesign to avoid and/or preserve significant resources as well as mitigation in the form of data recovery and monitoring (as recommended by the qualified archaeologist and Native American representative).

W-20 The Data Recovery discussion on Page 3.6-16 has been revised to incorporate the recommended language regarding Native American participation in all phases of the archaeological program. The Historical Resources Guidelines will also be revised to reflect this commitment by the City.

W-21 The Data Recovery discussion on Page 3.6-17 has been revised. The word "reburied" will be replaced with "repatriation" as recommended and the words "upon consultation" and "in accordance with state regulations" will be stricken from the sentence. The Historical Resources Guidelines and Mitigation, Monitoring and Reporting Program will also be revised, where applicable to ensure consistency.

W-22 Staff has reviewed the 2006 revisions to Section 5097.98 of the Public Resources Code (PRC) and concurs with the recommended revisions regarding notification, access and recommendations by the MLD within the 48 hour time period. As such, the EIR, Historical Resources Guidelines and Mitigation, Monitoring and Reporting Program will be revised, where applicable to ensure consistency. According to Section 5097.98(e) of the PRC, the requirement for recording the burial site with the Native American Heritage Commission is necessary only when the following situation occurs:

Whenever the commission is unable to identify a descendant, or the descendants identified fail to make a recommendation, or the landowner or his or her authorized representative rejects the recommendation of the descendants and the mediation provided for in subdivision (k) of section 5097.94. if invoked, fails to provide measures acceptable to the landowner, the landowner or his or her authorized representative shall inter the human remains and items associated with Native American human remains with

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appropriate dignity on the property in a location not subject to further and future subsurface disturbance. To protect these sites, that landowner shall do one or more of the following:

(1) Record the site with the commission or the appropriate Information Center.

(2) Utilize an open-space or conservation zoning designation or easement.

(3) Record a document with the county in which the property is located.

- W-23 Staff has reviewed the 2006 revisions to Section 5097.98 of the Public Resources Code and concurs with the recommended revisions. As such, the EIR, Historical Resources Guidelines and Mitigation, Monitoring and Reporting Program will be revised, where applicable to ensure consistency with state law.
- W-24 Language has been added to the MMRP under the Post Construction section “Handling of Artifacts” indicating that the cost of curation is the responsibility of the property owner.
- W-25 As stated on Page 3.6-9 in the Historical Resources Section of the EIR, implementation of the policies identified in the Historical Preservation Element and compliance with the Historical Resources Regulation and Guidelines would reduce direct and/or indirect impacts, there is no guarantee that all future project level impacts can be avoided or mitigated to below a level of significance. Therefore, the Mitigation Framework Section provides examples of project level mitigation that is currently being applied to projects which result in significant impacts to historical resources. In addition, improvements to the procedure for staff review of projects where historical resources have a likelihood to be located is intended to provide an early tool toward reducing impacts through project redesign, preservation in place and/or avoidance in accordance with local and state regulations. Please see also response to comment W-15.

COMMENTS

RESPONSES

- | | |
|------|---|
| W-26 | The PEIR Historical Resources Section 3.6.4 has been revised to include language which clearly states that all future project submittals will be subject to site specific review in accordance with the Historical Resources Regulation and Guidelines. |
| W-27 | The referenced section has been updated to include additional regulatory sources as recommended. |

GENERAL PLAN

CARMEL VALLEY COMMUNITY PLANNING BOARD
 c/o NMA CONSULTING
 427 C St., Ste. 300
 San Diego, CA 92101
 619-239-9577 x11 / Fax: 619-239-9078

June 12, 2007

Ms. Marilyn Mirasoul, Environmental Planner
 City of San Diego Development Services Center
 1222 First Avenue, MS 501
 San Diego, CA 92101

RE: Draft Program Environmental Impact Report (PEIR), 25 Apr 2007 (Project No. 104495, SCH No. 2006091032) and the City of San Diego General Plan (Final Public Review Draft, October 2006) Draft General Plan

Dear Ms. Mirasoul,

References:

- 1. Carmel Valley Community Planning Board letter, 3 June 2005, re: Comments on General Plan Discussion Draft April 20, 2005.
- 2. Carmel Valley Community Planning Board letter, 11 October 2005, re: Comments on General Plan Update Draft July 2005.

Thank you for the opportunity for the Carmel Valley Community Planning Board (CVCPB) to submit comments to the Draft General Plan Update (the Project) and the Draft Program Environmental Impact Report (PEIR) prepared for the Project. Because the nearest available noticed meeting of the CVCPB did not occur until June 12th, which is the earliest opportunity for the Board to publicly discuss and vote on its official comments at a noticed meeting as required by Council Policy 800-24, we trust you will accept this letter for inclusion in the Final PEIR and preparation of formal responses to comments.

Background Summary:

In our two previous letters (refs. 1 & 2) we raised these significant concerns:

- X-1 The relationship of the Community Plan to the General Plan, particularly where the Community Plan is more restrictive and directive than is the General Plan, and our belief that "in cases in which there arise conflicts between the General Plan and a community plan, the more restrictive language of the community plan shall prevail. (Strategic Framework Element and Land Use and Community Planning Element)
- X-2 2. Other Community Open Space, as a land use designation, shall be viewed as "on par" with and as important as MSCP Open Space in General Plan discussions. (Urban Design Element and Conservation Element)
- X-3 3. Clarify the City's intention, as addressed in the General Plan, to make the Land Development Code sections of the Municipal Code and Zoning regulations conform to City and community land use plans, rather than vice versa.
- X-4 4. Include a specific mention of *trails* in the list of recreation element features of the General Plan, (Recreation Element)

X-1 – X-5 While the issues raised in these comments do not address the adequacy of the environmental document, the following responses are provided as a courtesy to the commenter.

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 12 June 2007

- X-5 5. Respect for Carmel Valley's tailored signage guidelines (adopted by City Council ordinance in 1989), with precedence over the more general city-wide controls found in the Land Development Code signage regulations.

Rather than repeat each of those comments in detail, by reference and attachment, we include those comment letters (refs: 1 & 2) in their entirety with this comment letter. This comment letter, as indicated in the subject caption, provides comments and raises issues from both the October 2006 Final Public Review Draft of the General Plan (the Project) and the Program EIR prepared for that Project.

1. Community Plan

The Draft General Plan document addresses the relationship between its Elements and community plans in several locations, principally the Strategic Framework Element and the Land Use & Community Planning Element. Key among the many statements is the following:

Community plans represent a vital component of the City's Land Use Element because they contain more detailed land use designations and describe the distribution of land uses better than is possible at the citywide document level. San Diego is one of the few jurisdictions in the state that has the size, diversity, and land use patterns that necessitate community-based land use plans. The community-specific detail found in community plans is also used in the review process for both public and private development projects. While the community plan addresses specific community needs, its policies and recommendations must remain in harmony with other community plans, the overall General Plan, and citywide policies. (Underline added) (SF-8)

The General Plan relies upon the community plans to provide the site-specific guidance to implement many of the General Plan policies, and the continued involvement of an engaged citizenry to monitor its implementation. (Underline added.) (SF-29)

The Land Use Element addresses land use issues that apply to the City as a whole. The community planning program is the mechanism to refine citywide policies, designate land uses, and make additional site specific recommendations as needed. The Land Use Element establishes the structure to respect the diversity of each community and includes policy direction to govern the preparation of community plans. (Underline added) (LU-3)

In its discussion of "Roles and Relationships - General Plan and Community Plans," the Land Use and Community Planning Element appears now to have struck a more workable statement of the relationship of the community plan to the General Plan than that found in the previous draft. The LUCP Element now provides:

The community planning program has a long and diverse history. Each document is a unique reflection of the issues and trends facing the community and corresponding strategies to implement community goals.

Community plans represent a significant and vital component of the Land Use Element in that because they contain more detailed land use designations and site-specific policy recommendations than is possible at the citywide level. While the community plan addresses specific community needs, its policies and recommendations must be in harmony with other community plans, the overall General Plan, and citywide policies. (Underline added) (LU-21)

The previous version emphasized the supremacy of the General Plan, to which all other plans must be deemed "consistent with the overarching goals, objectives, and policies of the General Plan." Under this revised formulation, "harmony" rather than strict "conformity" or "consistency" would appear to allow a

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community plan to better develop the "site-specific policy recommendations" in a manner responsive to the community's needs while respecting the citywide policies of the General Plan.

X-6

At the same time, this revised formulation of the community plan-to-General Plan relationship gives us pause that in some future key land use decision, a conflict will be resolved at the staff level by an assertion that the General Plan "trumps" the community plan. Such an assertion, we suggest here, would be challenged.

2. **Other Community Open Space**

Comment: The two leading Guiding Principles of the Strategic Framework Element mention "open space" as core values guiding San Diego's future development:

The City of San Diego General Plan integrates the following basic principles which describe the essential structure of San Diego's plan and reflect the core values that guide its development:

- 1. An open space network formed by parks, canyons, river valleys, habitats, beaches, and ocean;
- 2. Diverse residential communities formed by the open space network; (Emphasis added) (SF-6)

We believe recognition of the "open space network" as a defining element of community is vital to preservation of communities, whether urban, suburban or rural, and we welcome the emphasis found here in the Strategic Framework Element introduction.

X-7

Issue: On balance, however, this Final Public Review Draft of the General Plan falls well short of adequately addressing open space because it removes any discussion of "Other Community Open Space" that had been included in previous reviewed versions. The April, 2005 draft and the July, 2005 draft both contained a policy statement about protecting "other community open space" along the lines of:

Ensure the protection of **other community open spaces** that have been designated in community plans for long-term open space use primarily because of their value in **protecting landforms**, providing **buffers within and between communities** or potentially incompatible land uses, providing visually appealing open spaces, and **protecting habitat and biological systems** of community importance that are not otherwise induced in the... (MSCP) Open Space Category.

Instead of this strong and clear statement of the value of "other community open spaces," portions of the statement have been watered down and dispersed among several General Plan elements. For example,

- Urban Design Policies - Natural Features:
 UD-A.1. Preserve and **protect natural landforms** and features.
 a. Protect the integrity of **community plan designated open spaces**. (Emphasis added) (UD-7)

Meanwhile, the General Plan's potentially strongest statement of open space protection, the Conservation Element Policy CE-B, merely says:

- Protect and conserve the landforms and open spaces that: define the City's urban form; provide public views/vistas; serve as core biological areas and wildlife linkages; are wetlands habitats; provide **buffers within and between communities**, or provide outdoor recreational opportunities.
 a. Pursue funding for the acquisition and management of MHPA and other important community open space lands.
 b. Support the preservation of rural lands and open spaces throughout the region.

X-6

According to the State of California Guidelines, General Plan Guidelines, "Different policies must be balanced and reconciled within the plan." (12, 2003) The General Plan policies carry equal weight and create an integrated, internally consistent and compatible statement of policies. Consistency between General Plan policies and adopted land use plans is discussed in the PEIR Environmental Analysis section 3.8, page 3.8.26-3.8.29. The City's Threshold of Significance required the General Plan to analyze potential "conflicts with the environmental goals of adopted community plans, land use designations or any other applicable land use plans, policies or regulations of state or federal agencies with jurisdiction over the City." As part of the General Plan, community plan policies carry equal weight with policies in the General Plan. As stated in the PEIR, page 3.8-28, "[t]he adopted community plans have been and will remain the authority for land use, density and site specific recommendations. Where community plans are silent on policy issues, the General Plan policies will apply." The General Plan provides the overall policy framework and the community plans provides site specific direction.

To clarify this point, Policy LU-C.1 has been revised to include sub-item "b" as follows: *Rely on community plans for site-specific land use and density/intensity designations and recommendations.*

An additional policy has been drafted to address policy inconsistencies between a community plan (or a proposed amendment to a community plan) and the General Plan, as follows: *Maintain consistency between community plans and the General Plan, as together they represent the City's comprehensive plan. In the event of an inconsistency between the General Plan and a community plan, action must be taken to either: 1) amend the community plan, or 2) amend the General Plan in a manner that is consistent with the General Plan's Guiding Principles.*

X-7 and X-8 The Carmel Valley plan differentiates between natural open space and community open space (such as manufactured slopes, landscaped corridors etc.), and that the current General Plan draft does not contain the term “community open space”. However, the General Plan policies address all types and roles of open space, both natural and man-made, despite not using the same term used in previous drafts. The General Plan policy is not requiring that community open space provide a conservation benefit, it states that [community] open spaces have been designated in plans because of their many conservation benefits. The General Plan recognizes the protection of community plan designated open space through the Urban Design Element policy UD-A.1 which states: “Preserve and protect natural landforms and features” and sub-policy “a” which states: “Protect the integrity of community plan designated open space.” These statements address open space primarily in relationship to proposed development. The General Plan also recognizes that community plan open space is multi-functional and may vary from community to community. For this reason, policies have been added to the Urban Design, Recreation, and Conservation Elements to capture the variety of roles of open space. The policy modification from past General Plan drafts to the current draft regarding community plan open space offers a broader policy perspective by addressing community plan open space in multiple elements and by providing cross references to similar policies. Additional cross references to these policies have been added since the October 2006 General Plan draft.

X-9. The list of Recommended Community Plan Designations on Table LU-4 of the General Plan is intended to establish a common nomenclature to describe similar land uses and create internal consistency. These land uses are then used in conjunction with site specific recommendations to identify the individual needs of the community. See Policy LU-B.1. Also see Appendix B, LU-2, of the General Plan, Community Plan and General Plan Land Use Designation Table, which lists and groups the existing community plan land use designations under the recommended land use designations provided in the General Plan.

COMMENTS

RESPONSES

- X-10. This comment is correct. The City's adopted land use plans provide guidance and set the framework for the implementing regulations found in the Land Development Code. Zoning will be reviewed and changed as appropriate to implement General Plan policies.
- X-11. This comment is correct.
- X-12. The Carmel Valley Signage Guidelines will not be rescinded with the adoption of the General Plan. The General Plan signage policies are intended to provide general guidelines for signage and do not replace existing, more specific signage policies and requirements that may be located in community plans and/or adopted as an ordinance.
- X-13. A rescission of the Carmel Valley Signage Guidelines is outside the scope of the General Plan and PEIR. The scope of the General Plan PEIR analysis does not address the Carmel Valley Signage Guidelines. Any action directly related to the Carmel Valley Signage Guidelines would require separate review and environmental analysis that is not part of this project.

**RANCHO BERNARDO
COMMUNITY PLANNING BOARD**
15721 Bernardo Heights Parkway, Ste B-230
San Diego, CA 92128
www.RBPlanningboard.com

June 11, 2007

Marilyn Mirrasoul
City of San Diego, Development Services Center
1222 First Avenue, MS 501
San Diego, CA 92101

Re: Comments to the Draft Program EIR for the City of San Diego General Plan Update

Dear Ms. Mirrasoul:

The Rancho Bernardo Community Planning Board's Regional Issues Committee has spent many months reviewing the Draft General Plan Update and the accompanying Draft Program EIR (DPEIR). We appreciate the time that City staff has taken to listen and respond to the many comments and concerns provided by residents throughout the City with respect to the General Plan Update. We look forward to the staff's responses to the comments provided on the Draft Program EIR.

The Regional Issues Committee's comments regarding the DPEIR's adequacy and accuracy and our questions regarding certain discussions in the document are provided below.

Y-1 Introduction: The DPEIR in Section 2.1.3 states "The City of San Diego and other agencies may use information in this Program EIR to determine if additional environmental review is required for subsequent actions linked to the General Plan." Based on the analysis provided in the DPEIR, which in most cases describes the ability to assess site-specific impacts and provide specific mitigation as infeasible, it would appear that additional environmental review will be required for all subsequent actions linked to the General Plan. The Final PEIR should more clearly describe the subsequent actions that will be taken by the City to implement the General Plan and explain how and when project-specific impacts will be analyzed. Of particular interest is the General Plan Action Plan described on page 2-51. Will the environmental effects of implementing this Action Plan, which is intended to include specific legislative, regulatory, administrative, and collaborative implementation actions, be evaluated in a step-down CEQA document?

Y-2 Project Description: The DPEIR is not consistent in its description of the intent of the proposed General Plan Update. On page 2-23, the DPEIR states that the General Plan "does not change land uses, but rather provides the framework and policy direction for future community plan updates," while on page 3.8-27, it is stated that "Implementation of the General Plan would require that some

General Plan Update Draft Program EIR
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- Y-1 The intent of the Action Plan is to identify a work program for implementing the policies in the General Plan, and is covered by this PEIR. However, once an implementation measure or program is proposed, it will undergo the appropriate environmental analysis. For example, community plan updates, modifications to the Land Development Code, and development projects will require separate environmental review.
- Y-2 These statements are not in conflict. The PEIR recognizes that there are community plans that do not currently contain policies which address the General Plans City of Villages strategy, such as mixed-use land use designations or policies related to multi-modal connectivity and public space. The General Plan provides policy direction and outlines the criteria for identifying village locations in community plans. It is not possible at the General Plan level to ascertain the specific impacts that may occur since no changes to the community plans are proposed at this time. Any proposed village locations or impacts related to land use changes will need to be analyzed for environmental impacts as part of the community plan update process.

of the community plans within the City be amended to identify future areas suitable for village development. Because other community plans do not address or encourage mixed use development, the community plans would need to be amended to effectively implement the proposed General Plan." The latter statement implies that land uses must be changed in order to implement the General Plan once it is adopted. If this is the case, the impact analysis in the DPEIR should have attempted to more clearly identify the potential environmental effects of such changes in land use within those communities that are most likely to be affected.

Y-3 Biological Resources: The analysis of potential effects to biological resources as a result of implementing the policies and recommendations of the General Plan fails to address the potential loss of native habitat associated with the implementation of parkland "equivalencies." The General Plan implies (see page 2-11 of the DPEIR which states "Alternatives, which provide additional parkland acreage (such as . . . portions of resource-based parks with neighborhood park components and facilities) that portions of resource-based parks could be developed to reduce current and future park deficiencies in the some communities. No guidance is provided as to when it might be appropriate to develop vacant lands within our resource-based parks in an attempt to reduce current park deficiencies and/or address added new demands for park lands associated with increased development. Without this guidance there is no assurance that significant address impacts to biological resources would be avoided. The PEIR should be revised to address this issue. One measure that could be implemented to address this concern is the adoption of an open space protection policy that defines under what circumstances designated open space might be used for active recreational purposes. Such a policy was drafted several years ago but was never presented to the City Council for consideration.

Health and Safety: Pages 3.5-6 and 3.5-7 include a lengthy discussion of current policies that are meant to address compatibility between airports and future land uses that surround them. Unfortunately, these policies only address discretionary projects. The Sunroad building near Montgomery Field illustrates the major flaws in current policy. Adherence to adopted ALUCPs and FAA regulations is not occurring.

Y-4 The mitigation framework measures addressed in the DPEIR do not adequately address avoiding impacts related to off-airport aircraft operations accidents. Further, the General Plan policies as currently proposed are not adequate to ensure that the health and safety impacts of off-airport aircraft accidents will be precluded. The vague statement about restrictive use easements provided in Appendix C of the Draft General Plan does not provide the policies necessary to avoid problems like the Sunroad building at Montgomery Field. Current and future policy only addresses discretionary actions; no provisions for ensuring compliance for ministerial projects are presented or even addressed. The policies assume the developer will contact the FAA rather than establishing a process in which the FAA provides comments on a proposal prior to the City taking final action on all building requests, discretionary or ministerial. Until these flaws in the system are corrected, the DPEIR should conclude that adequate measures are not included in the General Plan Update to avoid significant adverse health and safety impacts related to off-airport aircraft accidents. Unless the guidelines, policies, and Municipal Code are strengthened, the City of Villages proposals, particularly around airports, could result in public safety issues associated with incompatible development. The DPEIR should acknowledge the deficiencies of the current policies and recommend changes to address these deficiencies in the General Plan Update.

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Y-3 No specific projects or actions have been identified with the Draft General Plan that would result in any direct or indirect physical change in the environment. Direct impacts to biological resources, including impacts to native habitat (see Biological Resources Mitigation Framework), would be addressed in subsequent environmental reviews and on a case-by-case basis. Future discretionary actions would be subject to CEQA and impacts would be mitigated in accordance with the City's Biological Resource Guidelines of the Land Development Code (LDC). Guidance and site specific recommendations for equivalences will be identified through a Parks Master Plan and/or during the community plan update/amendment process as stated in Policy RE-F.9. The General Plan Equivalencies Policy, RE-F.9, has been edited and a new Table RE-5 – Eligible Population-Based Park Equivalencies replaces a portion of Table RE-4. General Plan policies, including Table RE-5 identify equivalency types but do not attempt to provide site specific recommendation.

An effort to approve a Council Policy 600-23 (Open Space, Acquisition, Retention, Management and Disposition) was stopped in favor of incorporating the main policy objectives into the General Plan. General Plan policies on open space, acquisition, retention and bio-diversity can be found through out the General Plan, specifically, the Recreation Element, Section B – Preservation, Section E – Open Space Lands and Resource-Based Parks and in the Conservation Element, Section B – Open Space and Landform Preservation, Section G – Biological Diversity.

Y-4 In the Land Use and Community Planning Element of the General Plan, the City has provided additional discussion and policies addressing the requirement to notify the Federal Aviation Administration for all projects (ministerial and discretionary) where projects meet the Federal Code of Regulations, Title 14, Part 77 requirements. Projects that meet the Part 77 notification requirement will be required to provide a no hazard determination from the FAA prior to approval. If the FAA determines that a project is a hazard, the applicant will need to obtain Planning

COMMENTS

RESPONSES

Commission and City Council approval once state and Airport Land Use Commission requirements are satisfied.

The City has also provided an additional discussion in the PEIR addressing the steps the City takes regarding Part 77. The City informs project applicants when projects meet the Part 77 criteria for notification to the FAA. The City will not approve ministerial projects that require FAA notification without a FAA determination of “No Hazard to Air Navigation” for the project. The City will not recommend approval for discretionary projects that require FAA notification without a FAA determination of “No Hazard to Air Navigation” for the project until the project can fulfill the state and Airport Land Use Commission requirements. The provision of this additional information further clarifies the City’s approach to this issue and does not affect the analysis or conclusions of the PEIR.

COMMENTS

RESPONSES

Y-5 **Traffic and Circulation:** The traffic analysis provided in the DPEIR describes a view of the traffic conditions as projected by SANDAG for the year 2030, but includes no analysis of the short- and mid-term impacts to the local and regional transportation system that would likely occur in several areas of the City as a result of the implementation of the City of Villages strategy. This is particularly true in areas where traffic improvements and/or transit connections are still awaiting funding or have funding but have not yet been constructed. Existing deficiencies with no identified funding sources makes this concern even greater. For example, although the community planning areas have adopted facilities financing plans, this should in no way imply that the necessary transportation projects addressed in these plans are either funded or ready for construction. In Rancho Bernardo, several critical transportation projects described in the soon to be adopted Facilities Financing Plan have no identified funding sources and there is no time table provided for when funding for those facilities might become available. These types of deficiencies should have been addressed and their implications analyzed in the DPEIR.

Y-6 The statement on Page 2-28 that the "Factors to consider when locating village sites include community plan identified capacity for growth, existing public facilities or an identified funding source for facilities, existing or an identified funding source for transit service . . ." does not adequately address this concern. Identifying a funding source is not the same as the facility being in place to accommodate new growth. If village sites are occupied without the needed infrastructure having been completed, significant adverse effects to the existing community will occur and should be addressed in this and future CEQA documents that address subsequent actions linked to the General Plan. Another factor that should be analyzed is the delay in transition from the use of cars to transit. As stated on Page 2-52 of the DPEIR, "even if transit deficiencies and other infrastructure needs are fully addressed in the next two decades, it is likely that the transition from the current auto-oriented pattern of development to a more diversified pattern built with transit and pedestrian-orientation will take many years to be fully achieved." The implications of this conclusion on the local and regional transportation system should have been addressed.

We appreciate this opportunity to provide comments and look forward to reviewing the Final Program EIR.

Sincerely,

Ellen Willis, Planning Board Chair

cc: Councilmember Brian Maienschein, San Diego City Council, District 5

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Y-5 The General Plan PEIR analyzes the traffic from a citywide perspective in year 2030 at a Program Level and is not intended to identify the specific timing of infrastructure needs. As stated in the PEIR, the City acknowledges that there are many uncertainties associated with the multi-year implementation of the Draft General Plan and regional transportation plans that would result in traffic impacts at various points in time. Potential for traffic impact exists due to possible changes in the availability of funding sources, specific project approval or construction delays, transportation infrastructure design changes, and new development projects that require new or different facilities. These are some of the challenges of financing the transportation infrastructure within each community. This level of detail in addition to the timing of the needed infrastructure will be addressed at the Community Plan level as the Community Plans are updated.

Y-6 The PEIR acknowledges that implementation of the General Plan could result in significant impacts to transportation, traffic, circulation, and parking (pg. 10, Conclusions). It is infeasible in this PEIR to provide specific mitigation that would reduce impacts to a less than significant level. Specific mitigation can only be developed once village sites are identified, which will occur through the community plan update process. Please see response to comment Y-5.

SAN YSIDRO PLANNING & DEVELOPMENT GROUP
 c/o David Flores, Chairman

June 8, 2007

VIA E-MAIL: mmirasoul@sanidiego.gov

City of San Diego Development Services Center
 Marilyn Mirasoul, Environmental Planner
 1222 First Avenue, MS 501
 San Diego, CA 92101

RE: General Plan Update, Project No. 104495

Dear Mrs. Mirasoul,

At the regularly scheduled meeting on May 15, 2007, with a quorum present, the San Ysidro Planning & Development group voted to accept the report of the subcommittee which reviewed all of the elements of the Draft General Plan and forward the recommendations to the City of San Diego as part of the public comment period.

Attached is the full report. What follows below are the 12 recommendations of the San Ysidro Planning & Development Group's General Plan Update Subcommittee.

Urban Design Element

- Z-1** • Policy Recommendation #1 - Neighborhood Streets - Request the Metropolitan Transit System provide pedestrian and automobile crossing in stretches that are currently too long and create too many closed loops.
- Z-2** • Policy Recommendation #2 - Transit Integration - Transit corridors should be improved as open spaces or landscaped corridors where possible.
- Z-3** • Policy Recommendation #3 - Transit Integration - Transit corridors should integrate innovative or alternate uses such as: pedestrian pathways, linear park/open spaces, or even public parking.
- Z-4** • Policy Recommendation #4 - Wireless Facilities - establish minimum and maximum coverage necessary for communities.
- Z-4** • Policy Recommendation #5 - Wireless Facilities - limit visual pollution by encouraging the use of pre-existing pole facilities.
- Z-6** • Policy Recommendation #6 - Wireless Facilities - strictly enforce temporary use permits and inform communities of permit expirations at least 6 months prior to expiration dates.

Economic Prosperity Element

- Z-7** • Policy Recommendation #7 - Base Sector Industrial Use - Consider re-designation of industrial properties to non-industrial use, where market demand calls for it.

Public Facilities, Services and Safety Element

- Z-8** • Policy Recommendation #8 - Public Facilities Financing - Request the Metropolitan Transit System increase funding for needed public infrastructure.

1319 5th Avenue • Chula Vista CA 91910 • 619 • 426-5113 or 619 • 426-3114

Overall comment: These comments do not address the adequacy of the environmental document; however, the following information has been provided as a courtesy to the commenter.

Z-1 This policy recommendation is addressed in the Mobility Element policies under Section A, Walkable Communities, specifically ME-A.4 and ME-A.6; and ME-C.3.

Z-2 This policy recommendation is addressed in the Mobility Element policies under Section A, Walkable Communities, specifically ME-A.6b and ME-A.7; and ME-B.9.

Z-3 This policy recommendation is addressed in the Mobility Element policies under Section A, Walkable Communities, specifically ME-A.6.b. and ME-A.7.

Z-4 Under the Telecommunications Act of 1996, the federal government has the primary authority to regulate telecommunications services, including the coverage provided to consumers. The City only has the authority to regulate aesthetics and land use associated with such facilities.

Z-5 Due to aesthetic concerns, the City encourages co-location on a case-by-case basis.

Z-6 Temporary use permits are strictly enforced and are only issued for citywide public events up to a maximum of 90 days. Due to limited resources, it is not possible to inform communities or permit expirations at least six months prior to their expiration.

Z-7 This policy recommendation does not address the long range policy strategy for Prime Industrial Lands in the General Plan. The purpose of the Economic Prosperity Element is to identify strategies to increase the standard of living of all San Diegans. Policies in the element are aimed at preserving the most important types of employment land in the City, such as land utilized by base-sector industries. Although some industrial land in the City is ripe for redevelopment to other uses, the Prime

COMMENTS

RESPONSES

Industrial Land policies are designed to preserve the City's most significant industrial land.

Z-8 This policy recommendation is addressed in the Mobility Element policies under Section A, Walkable Communities, specifically ME-A.6.

COMMENTS

RESPONSES

- such as pedestrian crossings or overpasses that will provide more accessibility and pedestrian connectivity.
- Z-9** • Policy Recommendation #9 - Police - Continue community relations storefronts in communities that where out stationed facilities are effective and necessary.

Recreation Element

- Z-10** • Policy Recommendation #10 - Joint Use and Cooperative Partnerships - Partner with the Metropolitan Transit System to develop linear parks along trolley right of ways or at a minimum request these areas to be landscaped to deal with negative visual impact of graffiti, negative visual impact of the built aesthetic and negative visual and noise impact of the train/trolley and tracks.

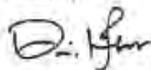
Mobility Element

- Z-11** • Policy Recommendation #11 - Connectivity - Request the Metropolitan Transit System identify and increase infrastructure such as pedestrian crossings or overpasses that will provide more accessibility and pedestrian connectivity.

Housing Element

- Z-12** • Policy Recommendation #12 - Use of Redevelopment Agency Set Aside Fund - Recommend to NOT use set aside funds outside of redevelopment project area for projects outside of redevelopment project area.

Sincerely,



David Flores
Chairman

cc: B. Anderson
B. Hueso
R. Manis
T. Millette
SYP&DG

- Z-9 The Public Facilities, Services and Safety Element policies (PF-E.1 through PF-E.7) address adequate police facilities and sufficient police services.
- Z-10 This policy recommendation is addressed in the Recreation Element policies under Section D, Joint Use and Cooperative Partnerships, specifically RE-D.8 and the Urban Design Element policies under Distinctive Neighborhoods and Residential Design, specifically UD-B.7 and UD-B.8.
- Z-11 This policy recommendation is addressed in the Mobility Element policies under Section A, Walkable Communities, specifically ME-A.6.
- Z-12 This policy recommendation addresses the Housing Element. The Housing Element is part of the General Plan but is under a different timeline and is not being updated at this time. The most recent Housing Element was adopted in October 2006 and is on a five year update schedule.

General Plan Update Subcommittee
REPORT & RECOMMENDATIONS
May 15, 2007

The General Plan Update Subcommittee has been meeting since January 2007 to review all of the 10 elements of the Draft General Plan to give recommendations to the SYP&DG. The elements that were reviewed are as follows:

1. Land Use and Community Planning Element
2. Mobility Element
3. Urban Design Element
4. Economic Prosperity Element
5. Public Facilities, Services and Safety Element
6. Recreation Element
7. Conservation Element
8. Noise Element
9. Historic Preservation Element
10. Housing Element

The subcommittee provided input and questions that look to the future community plan update. The recommendations follow each element section in bold. In total we are presenting 12 recommendations. The subcommittee will continue to work on generating a report that identify potential conflicts or issues that need to address consistency between the General Plan and the "San Ysidro Community Plan."

Thank you.

David Flores
Steve Otto
Michael Gill-Bramon

General Plan Update Subcommittee
Notes & Recommendations

Monday, January 29, 2007, 4:30-5:45 pm

David Flores
Steve Otto
Michael Gill-Branson
Thomas Adame

Introductions were made and four persons were present. It was decided unanimously that the subcommittee would present issues and note possible recommendations through the notes. The notes will be compiled at the end of reviewing all of the elements and presented for recommendation to the San Ysidro Planning & Development Group.

The elements reviewed at this meeting were: Land Use and Community Planning Element and Historic Preservation Element.

Land Use and Community Planning Element

San Ysidro Community Plan (Pages 12-19 summarize community land use)

- In the discussion of City of Villages, the designation for San Ysidro is still unclear when compared with the SANDAG designation for San Ysidro. [LU-A1b] (We need better maps of the 11x17's used in the General Plan Amendment. We cannot read any of them.
- Section B, General Land Use Categories (Tables LU-4) will have to match for community plan.
- Section C, Community Planning, second paragraph, Pg LU-21 is unclear. Request clarification
- Page LU-22 in the gray box it discusses a "Community Plan Preparation Manual" Where can we get a copy?
- Pages LU 34 and 37- *Balanced Communities and Equitable Development* subsection presents San Ysidro opportunities to mitigate public facilities and infrastructure deficit with a call to "invest strategically in public infrastructure and offer development incentives... (and accordingly to)...prioritize and allocate citywide resources to provide public facilities and services to communities in need."
- The rest of the document identifies policies to update community plans to match general plan for consistency.
- What are the major impacts to areas that are not subject to major development capacity?
- How do we transition our "Planning Elements" from the San Ysidro Community Plan into the new City of Village policies?

- How do we integrate the border (International Gateway) into the policies of each element?
- How does the Coastal Zone Policies affect San Ysidro?
- How do we make sure that proposals do not compound existing public facilities deficiencies, when San Ysidro is already deficient in infrastructure and other facilities?

Historical Preservation Element

San Ysidro Community Plan (Pages 168-170 summarize cultural and historical resources)

- What incentives is the City going to provide to developers to maintain the Historical qualities of developments?
- How do we make the "Mi Pueblo" and San Ysidro Historic resources survey transition into one working element?

Thursday, February 8, 2007, 4:30-5:30 pm

David Flores
Steve Otto
Michael Gill-Brandon

Three persons were present for the meeting. The notes from this meeting will be compiled at the end of reviewing all of the elements and presented for recommendation to the San Ysidro Planning & Development Group.

The elements reviewed at this meeting were: Urban Design Element and Economic Prosperity Element.

Urban Design Element

San Ysidro Community Plan (Pages 105 to 124 include the "Urban Form Element")

- General Plan and community plan will be "further supplemented with site-specific community plan recommendations." - important for addressing BORDER issues. Page UD-5.
- When addressing the built environment and safety, the Crime Prevention Through Environmental Design (CPTED) concepts can be incorporated. Page UD-6
- MSCP is not identified in the San Ysidro Community Plan. How is this being integrated into community plan? Section UD-A, 1.b - Page UD-7
- Policy Recommendation #1 - Neighborhood Streets - Request the Metropolitan Transit System provide pedestrian and automobile crossing in stretches that are currently too long and create too many closed loops.
- Policy Recommendation #2 - Transit Integration -Transit corridors should be improved as open spaces or landscaped corridors where possible.
- Policy Recommendation #3 - Transit Integration -Transit corridors should integrate innovative or alternate uses such as: pedestrian pathways, linear park/open spaces, or even public parking.
- Policy Recommendation #4 - Wireless Facilities - establish minimum and maximum coverage necessary for communities.
- Policy Recommendation #5 - Wireless Facilities - limit visual pollution by encouraging the use of pre-existing pole facilities.
- Policy Recommendation #6 - Wireless Facilities - strictly enforce temporary use permits and inform communities of permit expirations at least 6 months prior to expiration dates.

Economic Prosperity Element

San Ysidro Community Plan (Pages 47 to 59 include the "Commercial Element") (Pages 67 to 71 include the "International Gateway Element")(Pages 81 to 86 include the "Industrial Element")

Overall, this element presented two larger issues: employment areas and development/redevelopment of existing economically zoned properties.

Industrial Land Use:

- Because only ¼ of identified industrial land is vacant and it's practically at build-out, San Ysidro should analyze its current industrial land use and its location. Does it make sense to keep industrial? Is it in the right location? - Page EP-5
- Because 2/3rds of the industrial land use is located in Otay Mesa, San Ysidro should analyze its highest and best use for its currently zoned industrial properties. - Page EP-5
- Reviewing the new land use designations of Table LU-4, maybe the best use of San Ysidro industrial zoned properties is to re-designate them to Business Park-Residential and focus on: Storage and Office uses. - Page EP-7
- *Policy EP-J-6 calls for "supporting efforts that facilitate the efficient movement of goods across the border for rail and truck." (EP 32). Since significant expansion to San Ysidro rail operations can be projected, it will be important to reconcile competing concerns: economic development versus excessive noise and pollution.*
- **Policy Recommendation #1 - Base Sector Industrial Use -Consider re-designation of industrial properties to non-industrial use, where market demand calls for it.**

Monday, March 12, 2007, 4:30-5:30 pm

David Flores
Steve Otto
Michael Gill-Branson

Three persons were present for the meeting. The notes from this meeting will be compiled at the end of reviewing all of the elements and presented for recommendation to the San Ysidro Planning & Development Group.

The elements reviewed at this meeting were: Public Facilities, Services and Safety Element, Recreation Element and Noise Element.

Public Facilities, Services and Safety Element

San Ysidro Community Plan (Pages 153 to 162 include the "Community Facilities and Services Element")

- The Public Facilities Financing section needs to coordinate all of the referenced financing elements: (Page PF-5)
 - o Public Facilities Financing Plan, Capital Improvement Program, Developer Impact Fees, Facilities Benefit Assessments, Redevelopment (missing from discussion)
- For Fire Rescue, is there a "Mutual Aid agreement" with county, state and federal government agencies for resources and participation with the City of SD for BORDER incidents? (Page PF-17)
- *Policy PF-A.3 suggests need to "Identify community-level priorities in community plans and PFFP, in consultation with community planning groups (and continue use PFFP to provide a baseline of existing needs and public prioritization preferences." A more relevant process is recommended, as opposed to basing everything on a set of projects dating from 1990.*
- *Policy PF-C. 5 calls for "developing a centralized citywide monitoring system, accessible to the public, to document and report." For such matters as filling potholes and repairing broken street lights, there needs to be a more systematic approach, as opposed to the casual filing of individual street repairs on the city's web site.*
- *Policy PF-J.2 calls for "maximize (ing) waste reduction and diversion." weton site recycling is not required for apartment and condominium complexes. Citywide programs with incentives should be put in place to remedy.*
- **Policy Recommendation #1 - Public Facilities Financing - Request the Metropolitan Transit System increase funding for needed public infrastructure such as pedestrian crossings or overpasses that will provide more accessibility and pedestrian connectivity.**
- **Policy Recommendation #2 - Police - Continue community relations storefronts in communities that where outstationed facilities are effective and necessary.**

Recreation Element

San Ysidro Community Plan (Pages 93 to 99 include the Parks, Recreation & Open Space Element)

- **Policy Recommendation #1 - Joint Use and Cooperative Partnerships - Partner with the Metropolitan Transit System to develop linear parks along trolley right of ways or at a minimum request these areas to be landscaped to deal with negative visual impact of graffiti, negative visual impact of the built aesthetic and negative visual and noise impact of the train/trolley and tracks.**

Noise Element

San Ysidro Community Plan (None included) - No comments.

Wednesday, April 11, 2007, 4:30-6:00 pm

David Flores
Michael Gill-Branton

Two persons were present for the meeting. The notes from this meeting will be compiled at the end of reviewing all of the elements and presented for recommendation to the San Ysidro Planning & Development Group.

The elements reviewed at this meeting were: Conservation Element, Mobility Element and Housing Element.

Conservation Element

San Ysidro Community Plan (Some references in the "Parks, Recreation and Open Space Element")

- No comments

Mobility Element

San Ysidro Community Plan (Pages 127 to 137 include the "Transportation and Circulation Element")

- *Policy E-C. 6 recommends to "locate and design new streets and freeways and to the extent practicable improve existing facilities." This is San Ysidro's challenge: to remedy unsustainable vehicle circulation network and incomplete freeway connections in a context of three freeways that divide the community.*
- **Policy Recommendation #1 - Connectivity - Request the Metropolitan Transit System identify and increase infrastructure such as pedestrian crossings or overpasses that will provide more accessibility and pedestrian connectivity.**

Housing Element

San Ysidro Community Plan (Pages 25 to 37 include the "Residential Element")

- Housing element identifies two Pilot Villages, recommend that San Ysidro be one of them. (Page HE-80)
- **Policy Recommendation #1 - Use of Redevelopment Agency Set Aside Fund - Recommend to NOT use set aside funds outside of redevelopment project area for projects outside of redevelopment project area. (Page HE-108)**



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Our File Number: 05FF-1104

June 25, 2007

Via Hand-Delivery

Marilyn Mirrasoul
 City of San Diego
 1222 First Avenue, MS 501
 San Diego, California 92101

Re: Comments to Draft Program Environmental Impact Report (SCH No. 2006091032) ("PEIR")

Dear Ms. Mirrasoul:

We represent the Otay Mesa Planning Coalition ("Coalition") with respect to certain projects in Otay Mesa that are included in the ongoing Otay Mesa Community Plan Update ("OMCPU"). We are submitting these comments on behalf of the Coalition to the Draft Program Environmental Impact Report, Project No. 104495, SCH No. 2006091032 ("PEIR") prepared for the City of San Diego General Plan Update ("GPU"). Please note that we also are submitting a separate letter focused solely on comments to the global warming/climate change sections of the PEIR.

AA-1

As an initial matter, we request that the PEIR's conclusion that, at a program level, all impacts remain "significant and unavoidable," be clarified. "Unavoidable" impacts generally are those for which no feasible mitigation measure or alternative is available to reduce impacts to less than significant levels. See Pub. Res. Code § 21100(b)(2). In contrast, there are feasible mitigation measures available to reduce many of the potentially significant impacts discussed in the PEIR. Presumably, it is not that mitigation measures are unavailable and impacts unavoidable, but that the projects themselves are unknown at this stage, as are the impacts from those projects, that results in the PEIR's conclusion that all impacts are significant and unavoidable. We request that the PEIR clarify that, despite its conclusions of unavoidable significant impacts for all impacts, future community plan or project-level CEQA analysis may nonetheless be able to conclude that otherwise significant impacts resulting from the proposed projects are fully mitigated or avoided by implementation of the same mitigation measures that are described in the PEIR.

PROJECT DESCRIPTION

The Coalition has been working with the City on an update to the 1981 Otay Mesa Community Plan. The draft OMCPU is not yet complete, but is focused on implementing the City's Strategic Framework Plan, including the City of Villages concept. As recognized by

AA-1 The impacts are considered "unavoidable" at the program level because the scope of the Draft General Plan project does not provide the means to mitigate future impacts. This conclusion does not preclude the opportunity to mitigate impacts to less than significant at the future community plan update or project level CEQA analyses. In fact, based on the CEQA analysis of projects that have been done by the City over the last 36 years, staff believes that the majority of future projects can be mitigated to below a level of significance.

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the GPU, it is at the community plan level that the City can best determine the appropriate location for development, the correct mix of land uses and the most appropriate densities and intensities. As a result, we believe the PEIR should recognize that even those areas not identified as having a high propensity for village development in the 2002 Strategic Framework Plan may nonetheless be appropriate and even desirable locations for implementation of the City of Villages strategy. Thus, while Figure 2.4-1 of the PEIR may identify certain areas that, based on historic development patterns, should be considered for mixed-use villages, it also should recognize that other areas may also have a propensity to develop as village areas, regardless of their past use. While the PEIR at 2-28 recognizes that Figure 2.4-1 is an "illustrative tool, not a land use map," it should recognize that the figure is not meant to prohibit or constrain development of villages in other areas of the City, where found to be appropriate as part of a community plan update, or otherwise.

AA-2

The PEIR states the Economic Prosperity Element is aimed at supporting businesses that "reflect the changing nature of industry...", but many of its policies instead seem aimed at protecting older technologies and types of employment uses. See PEIR at 2-35. Similarly, the PEIR at 2-36 repeats one of the Economic Prosperity Element's goals as being "No loss of employment land for base sector industries that contribute significantly to the regional or local economy" (emphasis added). Yet, the Element seems designed to protect base sector industries regardless of those industries' contribution to today's (or the anticipated future) economy, at a cost to other types of employment uses, as well as a loss of that could be put to alternative uses that are more responsive to the marketplace.

AA-3

AGRICULTURAL RESOURCES

The PEIR at 3.1-4 states that nonagricultural land in Otay Mesa is the only area outside of the San Pasqual Valley that has the potential to be converted to agricultural uses. This fails to recognize that agricultural uses occur only sporadically in the Otay Mesa area, and then only on an interim basis until the land can be put to its intended use. The agricultural uses that do exist in Otay Mesa are not contiguous, are surrounded by urban uses, and are not a primary source of economics in the community. Moreover, soils in the Otay Mesa area are of relatively poor quality. The existing community plan, in place since , has as its only objective regarding agricultural use that agricultural use be retained "until development is warranted."

AA-4

BIOLOGICAL RESOURCES

The PEIR at page 3.3-29 should clarify that the Coastal California Gnatcatcher mitigation is only required for grading and clearing activities that are to take place in areas within a certain distance of potential habitat, and not for all grading or clearing activities in any location, regardless of the potential presence of the Coastal California Gnatcatcher.

AA-5

AA-2 The PEIR has been revised to clarify that the Village Propensity map does not require, prohibit, or constrain the identification or development of village sites.

AA-3 The Draft General Plan generally defines base sector industries as those which import wealth to the local economy. Discussion in the Economic Prosperity Element acknowledges that there has been a shift from the production of goods to the development of intellectual products and processes. Both manufacturing and research and development functions support base sector industry in San Diego. The importance of base sector industries is emphasized over other types of businesses because they benefit City residents in two primary ways; wealth creation resulting in an increased standard of living for San Diegans, and fiscal benefits resulting in enhanced public services and facilities.

AA-4 Staff believes that the statement in the PEIR regarding potential agricultural land in Otay Mesa is appropriate. The Otay Mesa Community Plan does state the objective of retaining agricultural uses until development is warranted. There are also several statements about preserving agricultural uses east of Brown Field, in county lands identified as an "area for future growth." However, the plan also includes an option (Option 5, Agricultural Conservation) that designates all Class I-IV soils for agricultural uses. There are still properties that are zoned for agriculture but designated as other uses, thus ensuring that any future project will be analyzed for appropriate land use and zoning.

AA-5 The Mitigation Framework of the PEIR has been revised to reflect that noise mitigation requirements for avian species would be implemented "in areas where there is potential to impact these species (Coastal California Gnatcatcher MHPA only)."

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TRANSPORTATION/TRAFFIC/CIRCULATION/PARKING

Section 3. of the PEIR indicates that the GPU anticipates only "lower frequency bus service" along 1-905, north/south on Heritage, east/west along Airway Road from Heritage to east of La Media, then generally southerly on the unnamed road to Sempre Viva and then east along Sempre Viva to 1-905. This is based on existing conditions and does not take into consideration the proposed CPU for Otay Mesa, which would provide additional transit opportunities in the area.

AA-6

VISUAL EFFECTS AND NEIGHBORHOOD CHARACTER

Add Otay Mesa to Table 3.16-1, noting that views are not in the current community plan.

AA-7

ALTERNATIVES ANALYSIS

Page 7-5 of the PEIR analyzes the "Reduced Industrial Lands Protection Alternative," which would not identify Prime Industrial Lands or policies intended to protect the industries located on such lands. The PEIR errs in only analyzing this alternative for conformance with project objectives associated with industrial lands. Protecting industrial lands at the expense of other land uses has impacts on more than just industrial lands, and all of the project objectives are relevant. The basis for rejecting this alternative from further analysis is unsupported. Moreover, it is not clear from the PEIR that the goal of having sufficient employment land for a strong economic base would not be met from this alternative, since the city may have sufficient employment land for future employment needs without the protectionist Prime Industrial policy. The PEIR gives no evidence supporting its conclusion that the objective would not be met. Similarly, there is no evidence supporting the conclusion that the "no loss of employment land for base sector industries that contribute significantly to the regional or local economy" objective would not be met by this alternative. Industrial land in the City has not previously been protected by a special designation as "prime" land, yet, in part because the City has been able to rezone and/or redesignate land as circumstances warrant, the city has been able to have land available for the employment uses that best contribute to the local and regional economy. Devoting only one-half of a page to a discussion of the impacts and benefits of this alternative does not provide sufficient detail for adequate review and analysis of the environmental impacts and/or benefits of this alternative and the evidence does not support its rejection from further analysis.

AA-8

On page 7-21, the PEIR discusses a "Concentrated Growth" alternative, which would focus growth into only four subareas of the City and discourages growth in the remainder of the City. This alternative is not consistent with the GPU goal of allowing communities to plan the type of land uses and densities desired in their area through the community plan update process. Moreover, it fails to recognize that transit will in the future extend into other areas of

AA-9

AA-6 The transportation analysis was based on the currently adopted community plans throughout the City and region. The transit assumptions for the future were based on SANDAG's approved transit plans at that time. The City agrees there will likely be changes to the transit plans in Otay Mesa, however, potential changes are currently being discussed between the City and SANDAG and should not be assumed until the update to the Otay Mesa Community Plan is adopted.

AA-7 Comment noted. Otay Mesa has been included on Table 3.16-1. The adopted community plan for Otay Mesa contains a community-wide policy to preserve privacy and views.

AA-8 The City believes that the objective of having sufficient employment land for a strong economic base is directly related to the proposed goals of the Economic Prosperity Element and Policies EP-A.1 through EP-A.5 for Base Sector Industrial Uses. The Draft General Plan needs to make clear statements of City policy so that future misinterpretations of intent are not made. While the commenter believes that "the city may have sufficient employment land for employment needs" and does not need to have a map of Prime Industrial Land (on Figure EP-1 of the Economic Prosperity Element), this comment is speculative of a future condition. This alternative was considered and rejected during the PEIR scoping process, and requires only a brief explanation of the reasons it was excluded from more detailed analysis. Please refer to CEQA Section 15126 (c).

AA-9 The commenter's statement that the Draft General Plan has a "goal of allowing communities to plan the type of land uses and densities desired in their area through the community plan update process" is not a statement that is contained in the Draft General Plan. Instead, it states: "The [Land Use and Community Planning] 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." If the Concentrated Growth alternative were adopted, community plans would be required to be consistent with the Land Use and Community Planning Element.

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the City. It also would only partially meet project objective 2, to create diverse residential communities formed by the open space network. Outside of the four subareas, the communities may not be diverse, because higher density and mixed-use development would not be allowed in those areas, and lower density development would not be allowed in the chosen four subareas. While overall it may allow for both types of development in the City as a whole, it would not the objective of creating "diverse residential communities formed by the open space network" to be met.

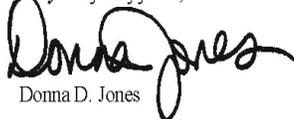
CONCLUSION

On behalf of the Coalition, we request that the above comments be incorporated into the Final PEIR. We appreciate your cooperation and assistance throughout this process, and would be happy to discuss any of the above concerns and mitigation measures with you further.

AA-10

Please feel free to call me with any questions. Thank you.

Very Verytrulyyours,



Donna D. Jones

for SHEPPARD, MULLIN, RICHTER & HAMPTON LLP

cc: David C. Nielsen, MNA Consulting
James T. Waring, Deputy Chief, Land Use and Economic Development
Bill Anderson, Director, Planning and Community Investment
Nancy Brogado, Project Manager, General Plan Update

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The analysis on page 7-21 also states: "Objective Number 5 [regarding an integrated regional transportation network of transit, roadways, and freeways] could potentially be met, but would reduce the transit connectivity among communities as fewer communities would have villages, and may require some redesign of the regional transportation network to add more capacity to the concentrated growth areas." It is incorrect to state that the objective of diverse residential communities could not be met under this alternative, since existing zoning and community plans would continue to allow mixed-use forms of development, relatively high densities, and social and economic diversity, and only the higher density forms of development (typically greater than 43 dwelling units per acre) would likely be limited to the four subareas and all multifamily (RM) zones permit single-family residences and lower density attached housing.

AA-10 The comments have been incorporated into the final PEIR and have therefore, been made a part of the administrative record.



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Our File Number: 05FF-110431

June 25, 2007

VIA HAND DELIVERY

Marilyn Mirrasoul - Environmental Planner,
Development Services Department
City of San Diego
202 C Street, MS 5A
San Diego, California 92101

Re: Otay Mesa Planning Coalition Comments to Draft PEIR
for General Plan Update (Sections 5.2 and 5.3 - Global Warming)

Dear Ms. Mirrasoul:

We represent the Otay Mesa Planning Coalition ("Coalition") with respect to certain projects in Otay Mesa that are included in the ongoing Otay Mesa Community Plan Update ("OMCPU"). We are submitting these comments on behalf of the Coalition to the Draft Program Environmental Impact Report ("PEIR") prepared for the City of San Diego General Plan Update ("GPU"); we understand from you that the deadline for such comments was extended through the end of today. Please note that these comments only apply to the global warming/climate change sections of the PEIR - we are submitting separate comments to the remainder of the PEIR today as well.

As an initial matter, we would like to recognize the very substantial effort that City staff has invested in the research and preparation of Sections 5.2 and 5.3 of the Draft PEIR. The discussions of existing law and policy that those Sections include are very good on the whole, though we do have some comments and additions to those Sections as noted below. More importantly, the structure of "Mitigation Framework Measures" for future discretionary projects is a useful starting point and will be a helpful tool allowing the General Plan to provide a measure of certainty for future development with respect to climate change impacts and related mitigation measures.

Please note that we are focusing our comments to the above Sections on the proposed mitigation framework, so that it can include a range of acceptable mitigation measures and clarify the context in which they would be used. The concerns and comments in this letter are structured as follows:

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- Part A contains comments to the background discussions in Section 5.2 of the Draft PEIR.
- Part B discusses some of the uncertainties inherent in regulating climate change impacts, particularly for new development, and suggests additional language for inclusion in Section 5.3 of the Draft PEIR to clarify this context.
- Part C provides suggestions for clarifying the structure of the mitigation framework contained in Section 5.3 of the Draft PEIR.
- Part D discusses specific mitigation measures that could be included within the proposed mitigation framework.

A. Additions/Changes to Section 5.2

The following comments and proposed changes pertain to the paragraphs of Section 5.2 of the Draft PEIR indicated below (please note that certain of these changes are passed along from our air quality consultant, Shari Libicki of Environ Corp. - we can arrange for Environ to provide further detail on these points if needed):

- BB-1** • Pg. 5-18: The relative contribution percentages in the first sentence on this page appear unusual to our air quality consultant, and are at odds with the following sentence on pg. 5-18 as well.
- BB-2** • Pg. 5-18, first full paragraph: Please note that the term "anthropogenic" rather than "unnatural" is typically used; also it is the "decomposition of solid waste" not just "solid waste" that causes GHGs.
- BB-3** • Pg. 5-18, Federal Plans: Please add to the end of this sentence ", other than certain federal plans allowing for voluntary reduction of greenhouse gas intensity."
- BB-4** • Pg. 5-18-19, State Plans: Please note that this section omitted several other pieces of California greenhouse gas legislation: SB 1368, which is the bill requiring lower CO₂ from baseline electricity generation, AB 1493, requiring lower CO₂ emissions from cars, SB 107, requiring regulated electric utilities to increase their use of renewable electricity sources and thereby offset existing in-state fossil fuel generation; and SB 1505, requiring greenhouse gas emissions standards for certain in-state hydrogen production and vehicular transportation purposes. See Exhibit A for further details.
- BB-5** • Pg. 5-22, Local Plans and Programs, third sentence of second paragraph: Our air quality consultant notes that these numbers are quite different than those from the rest of California; in particular, industry, which represents 20% of the emissions in the rest of

- BB-1** The relative contribution of a GHG to global warming is based on two factors: the atmospheric concentration of the GHG and its ability to absorb radiation and trap heat in the atmosphere relative to other GHGs. Although carbon dioxide (CO₂) represents 84 percent of all GHG emissions in California, the relative contribution of CO₂ to global warming is smaller because other GHGs with lower atmospheric concentrations such as methane (CH₄) and nitrous oxide (N₂O) absorb 23 and 300 times more radiation in the atmosphere, respectively, than CO₂.
- BB-2** Comment noted. The Final EIR has been amended to explain that the decomposition of solid waste results in GHG emissions.
- BB-3** Comment noted. The Final EIR has been amended to include a discussion of federal climate policy.
- BB-4** Comment noted. The Final EIR has been amended to include a discussion of Senate Bills 1368, 107, and 1505, and Assembly Bill 1493.
- BB-5** The numbers referenced in the comment are from the City's Climate Protection Action Plan (CPAP), which was adopted by the City in 2005. Without knowing the state GHG emission inventory or source to which the commenter is referring, the City is unable to respond to the comment that the results of the GHG emissions inventory reported in the CPAP are different from statewide GHG emissions. The CPAP did not inventory GHG emissions from agricultural activities in the City.

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California, is low (perhaps it is intended to be grouped with the landfills?), and there is no agricultural contribution. Please clarify.

BB-6

Pg. 5-23, second paragraph: After the reference to "recovering landfill gas", should this discussion note that the City has been or will be generating energy from the collected methane at landfills?

BB-7

Pg. 5-23, second bullet under Transportation: Our air quality consultant notes that the SULEV designation is typical for criteria pollutants, not greenhouse gas; does the City mean hybrids? If so, should this say hybrids, or highly fuel efficient cars?

BB-8

Pg. 5-23, second bullet under Energy Efficiency: We believe this should also refer to "active" landfills.

BB-9

Pg. 5-25, first paragraph following table: Please note that our air quality consultant believes it is incorrect to say that "there are no universally accepted means of quantifying vehicular emissions of GHGs", since there apparently are several accepted methods of quantifying GHGs from automobiles, once the fuel and VMT is known - the City may mean to say that it is impossible to accurately predict future VMT, fuel efficiency and carbon in the fuel, particularly with the new low carbon fuel standards. Should this be revised accordingly?

BB-10

Pg. 5-27, first partial paragraph on page: Concluding that... **incremental** GHG emissions associated with development under the Draft General Plan would cause a cumulatively considerable incremental contribution to the significant cumulative (worldwide) impacts... may be premature because local direct causal effects on worldwide climate change are still speculative. This type of conclusion could trigger the need for Statements of Overriding Considerations (SOCs) for every project developed under the General Plan. Consider revising this language in light of the mitigation framework approach proposed below, which is specifically intended to avoid the need for SOC's as further discussed herein.

BB-11

Pg. 5-27, last paragraph, second line: Stating that "These general measures... may be implemented to **preclude** impacts" could unintentionally set an unattainable standard. It is highly likely that despite implementation of greenhouse gas mitigation measures, there will be incremental impacts unless new emissions are reduced to zero. It is advisable to avoid setting a "one-molecule" type standard where any emission increase, regardless of size, trips the threshold. Thus, consider striking the word "preclude" and replacing with "reduce." This comment is subject to the much more detailed mitigation framework recommendations below.

BB-6 This is a comment on information from the CPAP. This commenter is correct that the City uses recovered landfill gas to generate power. This item has already been included in the text below the referenced section. Please see the second bullet under the title, "Energy Efficiency and Renewable Energy."

BB-7 This is a comment on information from the CPAP. The CPAP states that the City will provide incentives for vehicles that meet the Super Ultra Low Emission Vehicle (SULEV) California tailpipe emission standard, such as providing preferred parking at City parking facilities and free meter parking.

BB-8 This is a comment on information from the CPAP. Comment noted.

BB-9 The DEIR states that "there are no universally accepted means of quantifying vehicular emissions of GHGs." This is a correct statement. As the comment points out, there are several accepted methods of quantifying GHG emissions from vehicles. Publicly available methods include but are not limited to: URBEMIS; Clean Air and Climate Protection (CACAP) software; EMFAC, and the Climate Action Registry Reporting On-line Tool (CARROT). The statement in the DEIR is simply pointing out that none of these methods is universally accepted. The City provided a calculation of vehicular GHG emissions in the EIR using VMT, estimated fuel efficiency (miles per gallon), assumptions about the content of CO₂, CH₄, and N₂O in a gallon of gasoline, and assumptions about the global warming potential of each GHG. The City could have used other available methodologies and assumptions to calculate vehicular GHG emissions under the General Plan, although the results would not be anticipated to vary substantially from those presented in the DEIR. No revision to the DEIR is required.

BB-10 The comment that the "local direct causal effects on worldwide climate change are still speculative" is incorrect. The global scientific community has expressed through the *Intergovernmental Panel on Climate Change (IPCC) Fourth Assessment Report: Climate Change 2007* very high confidence that global warming is

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caused by increased concentrations of GHGs in the atmosphere attributed to human activities; and that global warming will lead to adverse climate change effects around the globe. The incremental increase in GHG emissions associated with future development would cause a cumulatively considerable incremental contribution to the significant cumulative (worldwide) impacts when viewed in connection with worldwide GHG emissions.

Regarding the comment that the preparation of Statements of Overriding Considerations (SOCs) could be required for every project developed under the General Plan, environmental documentation required by CEQA for future development may be able to tier off of the global warming analysis of the General Plan EIR if the global warming impacts of such future development were adequately addressed in the General Plan EIR.

BB-11: The sentence referenced in the comment has been revised in the Final EIR to replace the word “preclude” with the words “avoid or reduce.”

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BB-12 Should the mitigation measures adopted by the City include in some fashion a commitment by the City to more actively pursue the development and construction of additional mass-transit options (e.g. light rail, expanded trolley system, availability of bus rapid transit (BRT), etc.), including by continuing to pursue all available sources of regional, state-wide and federal funding for such transit options?

•
BB-13 Should the City's mitigation measures also include encouraging "green" businesses (such as solar and wind power-related, consultants promoting greater climate change efficiency, etc.) to be located in the greater San Diego region?

B. General Concerns With Mitigation Framework Language

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BB-14 General Uncertainty. We are concerned that the language of Section 5.3 (Mitigation Framework), the language most applicable to future discretionary projects, does not adequately reflect the level of uncertainty that exists with respect to the impacts of new development on climate change. First, the speculative nature of a direct link between proposed new development and global climate change in general should be emphasized. Second, and more specifically, there is no generally accepted methodology for assessing the potential cumulative incremental climate change impacts related to new development; therefore, it should be noted that a quantitative assessment of these impacts at the General Plan level or at a project-specific level would not be practicable at this time. These points should be clearly spelled out in the Draft PEIR.

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BB-15 The inclusion of a mitigation framework for future projects in the draft PEIR should not be understood to reflect a conclusion by the City (in its capacity as Lead Agency for CEQA review of the General Plan and future discretionary projects) that the effects of new development on climate change are necessarily significant. Rather, it should be noted that CEQA Guidelines Section 15064(g) requires significance determinations to be guided by the following principle:

If there is disagreement among expert opinions supported by facts over the significance of an effect on the environment, the Lead Agency shall treat the effect as significant and shall prepare an EIR.

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BB-16 Since there is significant disagreement among expert opinions on cumulative climate change impacts, particularly with respect to the impacts of new development, the above analysis could easily be applied to the climate change discussion in the Draft PEIR to justify the use of a mitigation framework for future projects, even though the significance of these projects' impacts on climate change is not clear.

2. Specific Ambiguities to be Described. In addition, language similar to the following should be included in the Draft PEIR to describe certain specific areas of ambiguity:

BB-12 The San Diego Association of Governments (SANDAG) is responsible for the planning and funding of the regional transportation network, including transit service such as the light rail Trolley system and planned Bus Rapid Transit (BRT) routes. As a result, the City has not identified the development and construction of mass-transit options, including funding for such options, as mitigation for the GHG emissions associated with future development. However, as discussed in the response to comment B-2, the City of Villages development strategy policies, which would focus growth into walkable, mixed-use villages served by high frequency transit service, thus increasing opportunities for use of public transit, were strengthened within the General Plan and included in the MMRP to ensure that these policies are imposed on future development.

BB-13 The Conservation Element has been revised to include a policy calling for the City to, "pursue the development of "clean" or "green" sector industries that benefit San Diego's environment and economy". The General Plan Action Plan identifies measures to implement this policy.

BB-14 As already discussed in the response to comment BB-10, the comment that the link between new development and global climate change is speculative in nature is incorrect. In addition, the response to comment BB-9 explains that although "there are no universally accepted means of quantifying vehicular emissions of GHGs", several methods of quantifying such emissions are available. The commenter appears to agree in comment BB-9, stating that, "there apparently are several accepted methods of quantifying GHGs from automobiles..." Available methods to quantify GHG emissions include, but are not limited to: URBEMIS; Clean Air and Climate Protection (CACAP) software; EMFAC, and the Climate Action Registry Reporting On-line Tool (CARROT). The comment states that, "a quantitative assessment of these [global warming] impacts at the General Plan level or at a project-specific level would not be practicable at this time." Given the availability of such models, and the fact that the DEIR includes a quantitative assessment of GHG emissions at the General Plan

level, it would be incorrect to state that such a quantitative assessment is not practicable at this time.

Furthermore, CEQA Guidelines §15064(b) states that “[a]n ironclad definition of significant effect is not always possible...” and that “the determination of whether a project may have a significant effect on the environment calls for careful judgment on the part of the public agency involved, based to the extent possible on scientific and factual evidence.” The DEIR states that GHG emissions from vehicular sources alone would total approximately 6.3 million tons of carbon dioxide equivalent (CO₂e) annually in 2020, and 6.7 tons of CO₂e annually in 2030. Projected 2020 GHG emissions associated with VMT are approximately 16 percent higher than 1990 levels and projected 2030 GHG emissions associated with VMT are approximately 24 percent higher than 1990 levels. The DEIR also concludes that energy consumption associated with future development would result in substantial levels of GHG emissions in excess of existing and 1990 levels. In the context of the state requirement under AB 32 to reduce statewide GHG emissions to 25 percent below 1990 levels by 2020, and the overwhelming scientific evidence that global warming is already occurring and that additional GHG emissions would only exacerbate the problem, the City has determined that the incremental GHG emissions associated with future development would cause a cumulatively considerable incremental contribution to the significant cumulative (worldwide) impacts when viewed in connection with worldwide GHG emissions.

- BB-15 The comment is correct that, “the inclusion of a mitigation framework for future projects in the draft PEIR should not be understood to reflect a conclusion by the City...that the effects of new development on climate change are necessarily significant.” As explained in the response to comment BB-14, the global warming impacts of the General Plan are considered cumulatively significant because future development would result in substantial levels of GHG emissions in excess of existing and 1990 levels in the context of AB 32 requirements for a 25 percent reduction in statewide GHG emissions below 1990 levels by 2020, and overwhelming scientific evidence that global warming is already

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occurring and that additional GHG emissions would lead to additional warming and exacerbation of the adverse climate change effects. The City's determination of cumulatively significant global warming impacts is not based on a disagreement among expert opinions.

- BB-16 The global scientific community has expressed through the *Intergovernmental Panel on Climate Change (IPCC) Fourth Assessment Report: Climate Change 2007* very high confidence that global warming is caused by increased concentrations of GHGs in the atmosphere attributed to human activities; that global warming is already occurring and will lead to adverse climate change effects around the globe; and that additional GHG emissions would lead to additional warming and exacerbation of the adverse climate change effects. As discussed in the DEIR, future development would result in substantial levels of GHG emissions in excess of existing and 1990 levels associated with increased VMT and increased energy consumption. It is clear that the incremental increase in GHG emissions under the General Plan would cause a cumulatively considerable incremental contribution to the significant cumulative (worldwide) impacts when viewed in connection with worldwide GHG emissions. Thus, there is substantial evidence that the global warming impacts of the General Plan are cumulatively significant. The commenter provides no facts or evidence supporting the claim that there is disagreement among expert opinions on cumulative climate change impacts.

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the baseline - for example, some projects may provide residences closer to existing or future places of employment (or services/employment closer to existing or future residences) than is typical for existing suburban development in the City and County of San Diego. In such cases, existing methods for calculation of greenhouse gas emissions are likely to overstate the impacts by substantial margins.

BB-17

- Lack of "New" Impacts from New Development. Even more fundamentally, it is not at all clear that the continuing existence of new development (once construction is completed) represents "new" climate change impacts at all. The supposed climate change impacts that are at issue - primarily VMTs and energy use by dwelling units - are ultimately caused by human beings and their activities, rather than the existence of the dwelling units themselves. It would seem very unlikely that the existence of new development in San Diego would cause any increase in population from a global or national viewpoint. Even from a statewide or regional viewpoint, the evidence is mixed as to whether new development leads to additional immigration into the state or the region. In any event, since climate change is a global problem, the global perspective is likely the most appropriate for analyzing whether the impacts are "new".

BB-18

C. Clarifications to Structure of Mitigation Framework

The mitigation framework contained in the PEIR should be revised and clarified in several very important respects, as described below, by articulating an appropriate performance standard, refining the application of the "feasibility" concept under CEQA in this context, and clarifying the purpose and effect of the mitigation framework.

Performance Standard. First and foremost, a defined performance standard for mitigation measures used by future discretionary projects should be articulated, to provide the necessary framework for the mitigation measures discussed below.² We believe that, given the uncertainties described above, it is not appropriate or feasible to articulate a specific quantitative or numeric performance standard for future projects at this time - rather, an appropriate qualitative standard should be incorporated into the Draft PEIR for review of future projects, which appears to be generally consistent with the approach taken in the current text of Section 5.3 of the Draft PEIR. This approach is supported by existing CEQA case law regarding cumulative impacts, in that an EIR is only required to quantify its cumulative impacts analysis when quantitative data are reasonably available; when such data are not available, the EIR should only briefly describe why the impact cannot be quantified and provide a general

BB-19

² Use of a performance standard as set forth above will also help to prevent any risk that use of the mitigation framework structure could be viewed as impermissible "deferred mitigation" under CEQA, for both the PEIR and for future discretionary projects approved by the City.

BB-17 The City agrees with the comment that "AB 32 does not amend CEQA or otherwise dictate the type of document to be prepared under CEQA or the conclusions to be reached regarding a project's impacts". The DEIR for the General Plan and the significance conclusions thereof have been prepared in accordance with the requirements of the CEQA Statutes and Guidelines. However, it is the City's opinion that the GHG emissions reduction targets of AB 32 and Executive Order S-3-05 provide useful standards for determining the significance of the global warming impacts of a project under CEQA.

BB-18 The City again agrees with the comment that "AB 32 does not directly amend CEQA". Although "new development and significant redevelopment" is not explicitly categorized as a main source of GHG emissions in the CalEPA report referenced in the comment, new development and significant redevelopment would nevertheless significantly affect the level of GHG emissions from some of the main sources of GHG emissions within the City. For example, the increase in VMT and energy consumption associated with future development would result in increased GHG emissions in the transportation and electric power sectors, two of the main sources of GHG emissions cited in the CalEPA report referenced in the comment.

BB-19 The CEQA Guidelines §15064 provides a framework for determining the significance of the environmental effects caused by a project. No provisions of this section negate the City's obligation under CEQA to determine the significance of the global warming impacts of the General Plan prior to the adoption of a mitigation program or other program such as the one being prepared by CARB under AB 32.

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- CEQA Conclusions Not Dictated by AB 32. CEQA requires disclosure of a project's potentially significant impacts. Some of those impacts may or may not be from greenhouse gases. However, the fact that the legislature enacted AB 32 does not amend CEQA or otherwise dictate the type of document to be prepared under CEQA or the conclusions to be reached regarding a project's impacts. Information gleaned from processes created as a result of AB 32 may be helpful in conducting any required CEQA analysis, but do not dictate the type of analysis required.
BB-20
- Nature of AB 32. AB 32 does not directly amend CEQA. Instead, it provides for creation of a greenhouse gas emissions program that will involve identification of sources, prioritization of sources for regulation based upon significance of source contribution to greenhouse gas emissions, and eventual regulation of those sources. New development and significant redevelopment is not recognized as a significant or direct source of greenhouse gas emissions.¹
BB-21
- Phasing in of New Rules. The new rules will be phased in gradually over several years. Under AB 32, the California Air Resources Board (CARB) must identify significant sources or categories of sources of each greenhouse gas, and establish protocols and procedures for monitoring, quantifying and reporting the emissions by January, 2008. Next, CARB must issue a scoping plan to achieve emission reductions from specific sources or categories of sources by January, 2009. Finally, CARB must propose rules and caps for the sources by 2012. Until that time, the potential source characterization of, and significance of emissions contributions related to, new development will not be known, and numeric thresholds of significance cannot be established.
BB-22
- Interaction with Other Emissions Sources. Factually, the carbon footprint of new development derives from a variety of sources, and some of those sources, such as energy generation, are already subject to other requirements to achieve reductions in greenhouse gases (SB 107 and SB 1368 for example). The relationship between new development project impacts and the impacts of these other sources, each as mitigated by compliance with current requirements and as-yet-unestablished AB 32 reduction requirements, is far from clear.
BB-23
- Redirected Vehicle Trips. For many projects, the Vehicle Miles Traveled ("VMT") related to the project does not represent "new" VMT. At least a portion of the VMT calculated for the project may be re-directed VMT - that is, trips that are already occurring, but will now be in different locations or along different routes. In many instances, the actual VMT resulting from new development may be significantly less than
BB-24

¹ CalEPA 2006 estimates of California's main source of greenhouse gases in 2002: transportation sector (41.2%), industrial sector (22.8%), electric power sector (19.6%), agriculture & forestry sector (8.0%), and other sources (8.4%).

- BB-20 The comment is correct that the state has enacted legislation, such as Senate Bill (SB) 1368, to achieve reductions in GHG emissions. Under this legislation, the California Public Utility Commission (PUC) and California Energy Commission (CEC) have adopted standards requiring all new long-term commitments for baseload generation entered into by investor- and state-owned utilities have emissions not greater than combined cycle gas turbine plant (i.e., 1,100 pounds of CO₂ per megawatt-hour). Notwithstanding the fact future development would consume electricity generated in compliance with SB 1368, such development would still result in increased energy consumption, which in turn would result in increased GHG emissions relative to 1990 levels and existing conditions. Increased GHG emissions from energy consumption under the General Plan, when considered in combination with increased GHG emissions from VMT and other sources, remain cumulatively significant. As a result, the City has an obligation under CEQA to adopt feasible mitigation measures.
- BB-21 The calculation of GHG emissions associated with projected VMT under implementation of the General Plan accounts for, in the words of the commenter, "new" and "re-directed VMT". The projected VMT under the General Plan would result in increased GHG emissions, which would combine with the other sources of increased GHG emissions associated with future development to cause a cumulatively considerable incremental contribution to the significant cumulative (worldwide) impacts when viewed in connection with worldwide GHG emissions.
- BB-22 The calculation of GHG emissions used in the DEIR is based on projected VMT within the City under implementation of the General Plan. Projected VMT is based on the future land use distribution within the City, which is anticipated to include the development of residences closer to existing or future places of employment/services, and vice versa, than is typical for existing suburban development in the City or county of San Diego. Thus, the existing calculation of GHG emissions in the DEIR is not likely to overstate GHG emissions by substantial margins by failing to account for anticipated future increases in jobs/services and residential proximity.

BB-23 The comment appears to imply that the “new” climate change impacts (i.e., GHG emissions) attributed to “the continuing existence of new development” after completion of construction are caused by human beings and their activities, rather than by developments (such as dwelling units) themselves, although it is unclear what the commenter means by “new” climate change impacts and how such “new” impacts are differentiated from other climate change impacts. In any event, the comment also cites VMT and energy use by dwelling units as primary examples of sources of GHG emissions that are not associated with development. While it is true that the “continuing existence of new development” would not cause GHG emissions (apart from the construction of such development) if such development was unoccupied and unused by human beings, it would be incorrect for the analysis of GHG emissions associated with development under the General Plan to assume that such development would not be used by human beings or affect their activities in any way. In fact, the types of building techniques and features used in new development (e.g., green building techniques and solar panels on rooftops), the distribution of development (e.g., the proximity of jobs, services and housing to each other and to high frequency public transit), and other aspects of new development would significantly affect energy use in dwelling units and how far and how often people drive (i.e. VMT), which in turn would significantly affect future levels of GHG emissions. Thus, rather than having no effect on human beings and their activities, “the continuing existence of new development” significantly affects human activities, such as driving and energy consumption, that result in GHG emissions.

Furthermore, the comments that new development in San Diego is very unlikely to “cause any increase in population from a global or national viewpoint”, and that “the evidence is mixed as to whether new development leads to additional immigration into the state or the region” are not relevant to the DEIR’s evaluation of GHG emissions associated with future development. The General Plan represents the constitution for development in the City. Thus, rather than examine whether or not new development allowed under the General Plan would cause population increases (at a

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local, national, or global scale) that would in turn lead to increased GHG emissions, the DEIR examines whether development that is anticipated to occur under the General Plan in response to projected population growth would result in increased GHG emissions, and whether or not the increased GHG emissions would constitute a significant environmental impact under CEQA; the DEIR concludes that the General Plan would result in increased GHG emissions and that the incremental increase in GHG emissions would cause a cumulatively considerable incremental contribution to the significant cumulative (worldwide) impacts when viewed in connection with worldwide GHG emissions. This is a logical approach given that new development significantly affects human activities, like driving and energy consumption, that result in GHG emissions as explained above.

- BB-24 See the response to comment B-1 for a discussion of the City's approach to meet its obligation under CEQA to examine and require feasible options for mitigating the GHG emissions of future development. The inclusion of General Plan policies that reduce GHG emissions in the MMRP for the Final EIR ensures that they will be imposed on future development and not deferred to some later date. Pursuant to CEQA Guidelines §15097(b), "(t)he monitoring plan (for a general plan) may consist of policies included in (the) plan-level document".

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description of the cumulative impact.³ The Draft PEIR, with the changes suggested herein, should provide the necessary descriptions to satisfy this standard.

(a) Qualitative Standard Authorized by CEQA. Given the evolving standards and other uncertainties described above, we believe that the most appropriate qualitative performance standard would be to require such mitigation measures as are needed to achieve compliance with all local, state and federal laws and standards controlling or establishing thresholds for greenhouse gas emissions (as they may be revised and amended from time-to-time) as well as with the updated General Plan. This approach would allow a measure of certainty to future development while still permitting the applicable performance standards to be updated in accordance with regulatory changes. The foregoing approach is specifically authorized by CEQA Guidelines Section 15064(h)(3), which allows mitigation of a project's cumulative impacts through compliance with appropriate plans and mitigation programs, as follows:

BB-25

(3) A lead agency may determine that a project's incremental contribution to a cumulative effect is not cumulatively considerable if the project will comply with the requirements in a previously approved plan or mitigation program which provides specific requirements that will avoid or substantially lessen the cumulative problem (e.g., water quality control plan, air quality plan, integrated waste management plan) within the geographic area in which the project is located. Such plans or programs must be specified in law or adopted by the public agency with jurisdiction over the affected resources through a public review process to implement, interpret, or make specific the law enforced or administered by the public agency. (Emphasis added.)

Section 15064(h)(3) also provides for stricter standards to be imposed in appropriate cases, by noting that:

If there is substantial evidence that the possible effects of a particular project are still cumulatively considerable notwithstanding that the project complies with the specified plan or mitigation program addressing the cumulative problem, an EIR must be prepared for the project.

Under the above standard, additional environmental analysis of climate change impacts could be required, and additional mitigation measures imposed, in cases where it is clear that existing

³ See CEB, Practice Under the California Environmental Quality Act, pages 676-678, citing various cases, including *Al Larsen Boat Shop Inc. v. Board of Harbor Commissioners* (1993) 18 CA 4th 729.

BB-25 The comment references CEQA Guidelines §15064(h)(3), which allows a lead agency to determine that a project's incremental contribution to a cumulative effect is not cumulatively considerable if the project will comply with the requirements in a previously approved plan or mitigation program which provides specific requirements that will avoid or substantially lessen the cumulative problem. The City agrees that the adoption of a plan or program with specific requirements to avoid or substantially lessen the cumulative problem of global warming could reduce the General Plan's incremental contribution to the cumulatively significant problem of global warming to less than cumulatively considerable. However, the City has determined that there are currently no approved plans or mitigation programs at the local, state, or federal level which provide specific requirements to avoid or substantially lessen the cumulative problem of global warming that will avoid or substantially lessen the General Plan's incremental contribution of GHG emissions to the significant cumulative (worldwide) impacts when viewed in connection with worldwide GHG emissions. As discussed in the EIR, no GHG emission reduction measures have yet been adopted under AB 32 and it is unknown if any adopted measures will apply to local governments. Furthermore, the measures included in the CPAP do not apply to discretionary development projects that are anticipated to occur under the General Plan. As a result, the City has an obligation under CEQA to examine and require feasible mitigation measures. See the response to comment B-1 for a discussion of the City's approach to meet its obligation under CEQA to examine and require feasible mitigation measures that reduce the GHG emissions of future development.

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plans and mitigation programs do not address a particular project's specific climate change impacts. However, we would anticipate that the framework specified under the General Plan would be sufficient for most future residential, commercial and industrial projects that do not generate substantial "new" impacts of their own.

(b) Compliance with Regulations or Standards Upheld. Under California law, mitigation measures that require compliance with the lead agency's or another agency's environmental regulations or standards are generally acceptable when the lead agency has "meaningful information" that reasonably justifies "an expectation of compliance" with such regulations or standards, and where the measure is subject to performance criteria such as those typically found in applicable ordinances, rules, and standards. Courts have upheld mitigation measures such as submittal of a final grading plan for review and approval by a city engineer where the plan is subject to performance criteria included in ordinances, codes and other adopted standards.

BB-26

(c) Need for Coordinated Regional Approach. The clearest justification for use of the above qualitative performance standard - i.e., compliance with all applicable plans and mitigation programs - is that a coordinated regional approach is essential to achieve any realistic impact on the cumulative problem of climate change. Put another way, the only meaningful way of addressing the issue is through implementation of consistent state-wide and/or regional mitigation programs and standards of general applicability. To force individual projects to adopt measures in excess of such requirements - in a case-by-case, "ad hoc" manner - would have almost no beneficial effect on a region's contributions to climate change impacts, in the absence of general requirements that can be updated and applied to new development. As such, compliance with applicable plans and mitigation programs is the only realistic way to address the cumulative impacts of climate change in the coordinated fashion that is needed.

BB-27

2. Parameters for "Feasibility" Concept / Safe Harbor. In light of the above performance standard, the references to "feasible mitigation" and "to the extent feasible" in Section 5.3 of the Draft PEIR should be clarified to confirm that application of the performance standard above to individual projects will provide the appropriate "feasible" level of mitigation. Under Section 15364 of the CEQA Guidelines,

BB-28

"Feasible" means capable of being accomplished in a successful manner within a reasonable period of time, taking into account economic, environmental, legal, social, and technological factors.

By adopting the performance standard above, the PEER will set the "feasibility" level for climate change mitigation to be applied to development under the General Plan, thus providing clarity

⁴ See, e.g., *Gentry v. City of Murrieta*, 36 Cal.App.4th 1359, 1395; *Sacramento Old City Association v. City Council* (1991) 229 Cal.App.3d 1011, 1029-1030.]

BB-26 Comment noted.

BB-27 As discussed in the response to comment BB-25, the City has determined that there are no currently approved plans or mitigation programs with specific requirements to avoid or substantially lessen the cumulative problem of global warming that will avoid or substantially lessen the General Plan's incremental contribution of GHG emissions to the significant cumulative (worldwide) impacts when viewed in connection with worldwide GHG emissions. As a result, the City is required by CEQA to identify feasible mitigation measures to reduce the global warming impacts of the General Plan. See the response to comment B-1 for a discussion of the City's approach to meet its obligation under CEQA to examine and require feasible mitigation measures that reduce the GHG emissions of future development.

BB-28 As discussed in the response to comments BB-25 and BB-27, the City has determined that the "performance standard" referenced by the commenter (i.e., compliance with approved plans or mitigation programs) would not avoid or substantially lessen the General Plan's incremental contribution of GHG emissions to the significant cumulative (worldwide) impacts when viewed in connection with worldwide GHG emissions. Therefore, such a performance standard would not provide feasible mitigation under CEQA. See the response to comment B-1 for a discussion of the City's approach to meet its obligation under CEQA to examine and require feasible mitigation measures that reduce the GHG emissions of future development.

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and avoiding the heated debates that would otherwise ensue over what constitutes appropriate mitigation. In particular, it would help to avoid arguments by project opponents that a discussion of "feasible" mitigation measures for future projects should require analysis of each project's economics and profitability, which recent experience has shown to be very contentious (e.g. conflicting studies and expert testimony, confidentiality concerns, protracted delays). Instead, this approach will provide the City with a menu of possible mitigation measures to be selected, with the above qualitative standard for determining how many of such measures need to be applied to a given project, and allow the City to determine that compliance with this standard constitutes the "feasible" level of mitigation. This would operate, in effect, as a "safe harbor" for environmental review of future development, with the resulting benefits of certainty and predictability. (In the absence of such a standard, new development in the City would be significantly hampered if not shut down altogether, which would further reduce the affordability of residential, commercial and industrial space.)

BB-29

3. Updating of CEQA Significance Thresholds/New City Bulletin. A vitally important part of the mitigation framework structure will be for the City to revise its CEQA Significance Thresholds to discuss and articulate the above qualitative performance standard. The CEQA Significance Thresholds should also discuss (and/or incorporate) the mitigation measures set forth in Part D below - this could perhaps be done by preparation of a new City Bulletin (similar to the existing Biology Guidelines) that would list out and discuss the various mitigation measures available for compliance with existing laws and standards. Such Bulletin could then be referenced and incorporated in the revised CEQA Significance Thresholds.

BB-30

4. Purpose and Effect of Mitigation Framework. In connection with all of the foregoing, the PEIR would need to clearly specify that the purpose of the "Mitigation Framework" discussion in Section 5.3 is to establish a framework that allows future discretionary projects to be approved by the City without the need for preparation of a full EIR or adoption of a Statement of Overriding Considerations with respect to climate change impacts, to the extent that such project is consistent with the mitigation framework under the General Plan and the revised CEQA Significance Thresholds. Put another way, climate change impacts of future projects would then be considered to be covered by the scope of the PEIR pursuant to CEQA Guidelines 15168(c) and deemed to be mitigated to a level below significance, as long as appropriate measures are implemented per the above standards. This would save the City and future project applicants enormous time, effort and expense that otherwise might be required to evaluate the individual climate change impacts of each such project, due to the uncertain significance of individual projects' impacts. Naturally, to the extent that future discretionary projects might have other significant impacts under CEQA (i.e. in areas other than climate change), preparation of an EIR (perhaps with an SOC) or a mitigated negative declaration may nonetheless be required.

Updating of Rules and Standards. The Draft PEIR should make clear that the applicable rules and standards to be applied to future discretionary projects under the above

BB-29 Comment noted. The Development Services Department periodically updates its CEQA Significance Thresholds.

BB-30 As discussed in the response to comment BB-10, environmental documentation required by CEQA for future development may be able to tier off of the global warming analysis of the General Plan EIR if the global warming impacts of such future development were adequately addressed in the General Plan EIR.

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BB-31

performance standard will be subject to continual updating in accordance with changes to applicable local, state and federal laws and standards. This will allow new information received by governmental bodies and new regulations promulgated by CARS to be incorporated into the mitigation programs required for each development project that obtains discretionary approval from the City. As such, the applicable regulatory scheme will be flexible enough to satisfy future requirements.

BB-32

6. Compliance with Limitations on Recirculation. It is also very important for the City to conclude in the PEIR (and to confirm in other documents such as the revised CEQA Significance Thresholds) that the adoption of the mitigation framework for climate change impacts will not trigger recirculation of any CEQA documents that have already been certified for existing projects, or preparation of a subsequent or supplemental EIR for any such projects. To achieve this result, the PEIR and the CEQA Significance Thresholds should confirm that adoption of the mitigation framework will not constitute "substantial changes" with respect to the circumstances of any such project or "new information of substantial importance" for such project under Section 15162 of the CEQA Guidelines. Given the substantial uncertainties regarding the existence, scope and severity of climate change impacts for new development, the City as lead agency can easily reach this conclusion. This conclusion is also required by existing case law, under the two recent CEQA decisions discussed below.

- In *American Canyon Communities et al. v. City of American Canyon et al.*, Case No. 26-27462, the court found that there was no need to prepare a supplemental EIR for a development with a certified EIR based on new asserted impacts from climate change, since the passage of AB 32 did not constitute "significant new information" for purposes of CEQA.
- Similarly, in *NRDC v. Reclamation Board*, Case No. 06 CS 01228, relating to issuance of an encroachment permit for a "super levee", the court found that the effects of climate change did not constitute "significant new information" requiring new environmental review.

By including the necessary confirmations in the PEIR that recirculation of certified CEQA documents will not be required solely because of the new mitigation framework, the City will help forestall litigation that would otherwise be likely over the climate change impacts of existing projects (potentially arising both from developers and from project opponents).

D. Additional Mitigation Measures.

BB-33

The mitigation framework section (Section 5.3 of the Draft PEIR) and the revised CEQA significance thresholds should specify a "menu" of particular mitigation measures that could be used on future discretionary projects in connection with the above structure. This would allow CEQA compliance without need for a Statement of Overriding Considerations for

BB-31

As already discussed in the responses to comments BB-25, -27, and -28, currently adopted local, state, and federal plans and programs would not reduce the global warming impacts of the General Plan to a level less than cumulatively significant. As a result, the City has identified an approach to mitigate the global warming impacts of future development. However, the City acknowledges that local, state, and federal plans or program adopted or updated in the future may reduce the global warming impacts of future development if and when they are adopted.

BB-32

The recirculation of certified CEQA documents would not occur, as the recirculation requirements of CEQA do not apply to certified documents. In addition, future projects requiring preparation of subsequent or supplemental EIRs or any other environmental documentation required by CEQA may be able to tier off of the global warming analysis of the General Plan EIR if the global warming impacts of such future projects were adequately addressed in the General Plan EIR.

BB-33

See the response to comment B-1 for a discussion of the City's approach to meet its obligation under CEQA to examine and require feasible mitigation measures that reduce the GHG emissions of future development. In addition, future development requiring environmental documentation under CEQA may be able to tier off of the global warming analysis of the General Plan EIR if the global warming impacts of such future projects were adequately addressed in the General Plan EIR.

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each project, by allowing the City to conclude that the climate-change-related impacts of each individual project are not directly or cumulatively significant. It is important to emphasize that all of these mitigation measures would not (and could not) be required by the City - in many instances, a future discretionary project would only be able to implement a few of them. In all cases, a project would be permitted to select only the mitigation measures that are needed to bring it into accordance with all local, state and federal laws and standards controlling or establishing thresholds for greenhouse gas emissions at the time the project's application is deemed complete, as per the above performance standard. None of these measures therefore should be understood to be "mandatory", beyond compliance with such standard.

A list of some proposed measures (by no means exhaustive), which we have broken down into three separate categories for convenience, is set forth below for the City's consideration:

BB-34

1. Location-Based Mitigation Measures (where appropriate given geographic considerations).
 - Compliance with the City of Villages policies contained in the Strategic Framework Element of the General Plan (including some of the specific measures discussed below).
 - Transit-oriented development in accordance with applicable SANDAG policies, including location of projects in or near major transportation corridors and along current or proposed transit lines and connections, either in the Regional Transportation Plan or City planning documents.
 - Mixed-use development, which facilitates reduced automobile use due to proximity of complementary uses.
 - Encouraging compatible higher-density development in areas already partially urbanized; use of mixed-use and infill planning and development strategies; clustering of developments.
 - Compliance with regional planning criteria (e.g. SANDAG policies), including with respect to the jobs/housing balance and location of housing near employment and transportation centers.
 - Development of an integrated pedestrian and bicycle network to facilitate travel that is not reliant on consuming carbon-based fuels, or linking into such a network.

BB-34 See the response to comment B-1 for a discussion of the City's approach to meet its obligation under CEQA to examine and require feasible mitigation measures that reduce the GHG emissions of future development.

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BB-35

2. Mitigation Through Design and Construction Improvements

- Urban forestry: Enhanced landscaping, including planting of selected tree species demonstrated to provide maximum shade and CO₂ absorption benefits (i.e. carbon storage). Trees planted near dwelling units also act as insulators from weather thereby decreasing energy requirements (subject to applicable brush management and/or setback requirements).
- Water conservation measures, including incorporation of drought-resistant landscaping materials and efficient, satellite controlled sprinkler systems where cost-effective.
- Compliance with outdoor lighting codes designed to reduce energy and output.
- Compliance with State Energy Insulation Standards.
- Compliance with local energy and water conservation codes and policies.
- Compliance with Title 24 Department of Energy energy conservation design criteria.
- Participating in the U.S. Green Building Council's LEED certification program, or adopting energy efficiency/sustainability measures equivalent to those that would be required for LEED certification without obtaining actual certification.
- Minimizing and recycling construction-related waste.
- Encouraging use of biodiesel for heavy equipment during construction of projects.
- Utilizing combinations of construction materials with lower carbon footprints - for example, the use of wood as a building material to promote carbon sequestration (GHG impacts were estimated to be 26% higher with steel and 31% higher with concrete when compared to wood).
- Using salvaged and recycled-content materials for buildings, hard surfaces and non-plant landscaping materials.
- Increasing water conservation measures in the home and landscaping.
- Installing solar energy devices and using passive heating, natural cooling and reduced pavement.
- Installing electric vehicle charging stations where a likelihood of use and benefit can be demonstrated.

BB-35 See the response to comment B-1 for a discussion of the City's approach to meet its obligation under CEQA to examine and require feasible mitigation measures that reduce the GHG emissions of future development.

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- Encouraging use of "low emission fireplaces".
- Encouraging use of "green roofs", including rooftop gardens.
- Joining California Energy Commission's New Solar Homes Partnership, with associated energy-efficiency requirements.
- Encouraging site design to minimize energy use by taking advantage of sun-shade patterns, prevailing winds, and sunscreens.
- Compliance with Urban Heat Island Mitigation policy (if adopted), including by using light-colored and reflective roofing materials and paint, light-colored roads and parking lots, shade trees in parking lots, and shade trees on the south and west sides of new or renovated buildings.
- Encouraging use of energy efficient building materials, including alternative formulations of cement and asphalt that have substantially lower GHG emissions.

BB-36

3. Operational Mitigation Measures

- Compliance with Air Quality Management District rules and policies (including Rules 401, 402 and 403), and grading code and construction air quality policies designed to limit idling and limit construction equipment emissions, including ozone precursor emission controls, preparation of diesel emission reduction plans, requirements for use of ARB-certified equipment of post combustion controls, compliance with state construction vehicle emissions standards, etc.
- Preparation and implementation of Transportation Management plans to reduce VMT and to encourage van and carpool formation, telecommuting, alternative work schedules, personalized commute consulting, rideshare promotions, carpooling subsidies, bus and commuter rail service coordination, improved bicycle access and facilities, voluntary employer-based trip reduction programs, traffic calming measures, youth transportation, etc.
- Compliance with VMT reduction programs and policies, including programs and features (trails, bike lanes, bus stops and turnouts etc.) to encourage alternative forms of transportation, such as carpooling, walking and biking.
- Incorporation of congestion reducing measures and design features that will reduce vehicle emissions related to idling, including high LOS at signaled intersections, adequate ingress and egress, provision of dedicated turn lanes, synchronization of traffic signals, and other similar measures.

BB-36 See the response to comment B-1 for a discussion of the City's approach to meet its obligation under CEQA to examine and require feasible mitigation measures that reduce the GHG emissions of future development.

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- Encouraging new office developments with more than specified numbers of parking spaces to offer a parking "cash-out" program providing payments to those who do not use parking spaces for use of public transit or otherwise.
- Implementation of recycling programs to achieve City and State recycling goals, by installation and use of appropriate recycling and waste receptacles.
- Encouraging energy generation from alternative sources (e.g. facilitating installation of renewable energy generation devices by homeowners by allowing for appropriate electrical connections on request, use of recycled methane from landfills for energy generation, etc.).

Again, the PEIR should make clear that many or most projects will only be able to implement a few of the above measures. Projects that are able to utilize more of the foregoing mitigation measures than is required by existing mitigation plans and programs should be given appropriate credit in some form - e.g. preferred processing of City permits (e.g. "front of the line" priority along with fast-track and/or expedited review), credits against any future local regulatory requirements and/or fees that may be imposed on existing projects, other incentives specified under the voluntary California Green Builders Program created by the BIA, tax incentives, etc. An example of the foregoing type of project could include high density development located close to transit that also employs solar panels and appropriate energy efficiency measures. Creating appropriate incentives for these types of development could greatly assist the City with achieving its goals regarding GHG reduction.

BB-37

BB-37 See the response to comment B-1 for a discussion of the City's approach to meet its obligation under CEQA to examine and require feasible mitigation measures that reduce the GHG emissions of future development.

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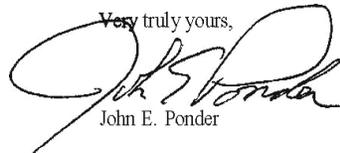
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E. Conclusion/Summar

On behalf of the Coalition, we request that the above comments and changes be incorporated into the Draft PEIR. We appreciate your cooperation and assistance throughout this process, and would be happy to discuss any of the above concerns and mitigation measures with you further.

Please feel free to contact either John Ponder (619-338-6646) or Rafael Muilenburg (858-720-8908) of our firm with any questions related to the foregoing or for any further information desired. Thank you.

Very truly yours,



John E. Ponder

for SHEPPARD, MULLIN, RICHTER & HAMPTON LLP

cc: James T. Waring, Deputy Chief, Land Use and Economic Development
Bill Anderson, Director, Planning and Community Investment
Nancy Brogado, Project Manager, General Plan Update
David C. Nielsen, MNA Consulting
Rafael Muilenburg, Sheppard Mullin

W02-WEST:6RM1400330936.6

SHEPPARD MULLIN RICHTER & HAMPTON LLP

Exhibit A

For informational purposes, a more detailed summary of other new California greenhouse gas legislation is provided below:

AB 1493 Summary: Approved in July 2002, this bill requires the California Climate Action Registry, in consultation with the State Air Resources Board, to adopt procedures and protocols for the reporting and certification of reductions in greenhouse gas emissions from mobile sources for use by the state board in granting emission reduction credits. It also requires regulations that achieve the maximum feasible reduction of greenhouse gases emitted by passenger vehicles and light-duty trucks and any other vehicles determined by the state board to be vehicles whose primary use is noncommercial personal transportation in the state. Under the bill, the regulations would apply only to motor vehicles manufactured in the 2009 model year, or any model year thereafter.

SB 1368 Summary. Approved in September 2006, and entitled "Greenhouse Gas Emissions Performance Standard for Baseload Electrical Generating Resources," SB 1368 requires the California Energy Commission and the California Public Utilities Commissions to adopt regulations to prohibit new capital investments in power plants serving the public unless their greenhouse gas emissions are as low or lower than GHG emissions from new natural gas power plants. This greenhouse gas performance standard will apply to all in-state and out-of-state generators, whether fueled by coal or other fuels. This bill will make it more difficult to upgrade or develop coal-powered and other fossil fueled power plants.

SB 107 Summary. SB 107, "California Renewable Electricity Standard," expands California's existing Renewable Electricity Standard (RES) to require that regulated electric utilities increase their use of wind, solar and other renewable electricity sources to achieve a 20% goal of renewable energy source by 2010. The bill also requires that electricity delivered into the state meet this goal, thereby offsetting the existing in-state fossil fuel generation. All investor-owned and municipal utilities must address carbon emissions in their long-term procurement plans. For the first time, municipal utilities must report progress toward meeting this goal. This law is considered an initial step to pave the way for the use of tradable renewable energy credits to achieve compliance.

SB 1505 Summary. This bill sets complete life-cycle emissions standards for hydrogen used for transportation in the state in order to ensure emissions are reduced. The bill also requires a certain percentage of this hydrogen be produced from renewable sources. SB 1505 requires the GHG emissions of hydrogen vehicular fuel be reduced by 30% on a per-mile basis when compared to the average gasoline vehicle. Source-to-tank emissions of nitrogen oxides (NOx) and reactive organic gases (ROG) must also be reduced by 50% compared to gasoline baseline, and the emissions of toxics must also be reduced to the maximum extent feasible. The statute also would require a 33.3% of the transportation hydrogen be produced from eligible renewable sources.

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June 20, 2007

Marilyn Mirrasoul
Environmental Planner
City of San Diego Development Services Center
1222 First Avenue, MS 501
San Diego, CA 92101

Re: Draft General Plan, Draft Program Environmental Impact Report, Project No. 104495, SCH No. 2006091032

Dear Ms. Mirrasoul:

This letter is submitted on behalf of Friends of San Diego, a non-profit public interest organization, in connection with the Draft General Plan ("Project") and Draft Environmental Impact Report ("DEIR").

The Project is intended to guide future growth and development in the City of San Diego, yet DEIR's discussion of the Project's impacts is insufficient. Furthermore, the DEIR fails to consider appropriate mitigation to reduce negative impacts. The DEIR is sufficiently lacking that the only way to fix it is to revise it and recirculate an adequate report.

CC-1

INTRODUCTION

The California Environmental Quality Act ("CEQA"), Pub. Res. Code §§ 21000 - 21177, must be interpreted "so as to afford the fullest possible protection to the environment within the reasonable scope of the statutory language." *Friends of Mammoth v. Board of Supervisors* (1972) 8 Cal. App. 3d 247, 259. CEQA is essentially "an environmental full disclosure statute, and the EIR is the method ... [for] disclosure ..." *Rural Landowners Assn. v. City Council* (1983) 143 Cal. App. 3d 1013, 1020. An EIR's purpose is "to provide public agencies and the public in general with detailed information about the effect which a proposed project is likely to have on the environment." Pub. Res. Code § 21061. The EIR is the "heart of CEQA," CEQA Guidelines § 15003(a), and "protects not only the environment but also informed self-government." *Citizens of Goleta Valley v. Board of Supervisors* (1990) 52 Cal.3d 553, 564. Its purpose is "to alert the public and its responsible officials to environmental changes before they have reached the ecological points of no return." *County of Inyo v. Yorty* (1973) 32 Cal. App. 3d 795, 810 (emphasis added).

CC-1 This PEIR is an analysis of the Draft General Plan, which is by necessity a broad policy level document. Because of this, some degree of forecasting was needed in order to anticipate what types of impacts may be reasonably expected from future implementation of the General Plan policies. However, at the plan level of environmental review, it is not possible to know the details of specific future projects. Therefore, while it is highly likely that plan implementation will result in significant impacts, the impacts of specific future projects cannot be known at this time. For this reason, a mitigation framework is provided in the document to guide the development of mitigation measures for future projects, when their impacts are known and quantified.

An EIR only needs be recirculated when the lead agency adds significant new information to the document. However, "significant new information" is defined as a disclosure that a new significant environmental impact would result from the project or from a new mitigation measure proposed to be implemented; a substantial increase in the severity of an environmental impact would result unless mitigation measures are adopted that reduce the impact to a level of insignificance; a feasible project alternative or mitigation measure considerably different from others previously analyzed would clearly lessen the environmental impacts of the project, but the project's proponents decline to adopt it; or the draft "EIR was so fundamentally and basically inadequate and conclusory in nature that meaningful public review and comment were precluded (see CEQA Guidelines Section 15088.5). As none of these conditions have occurred with respect to this PEIR, recirculation is not warranted.

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INADEQUATE DISCUSSION OF PROJECT IMPACTS

The DEIR's discussion of historic resource impacts is insufficient. Among other things, a resource is considered historic under CEQA if it:

- (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 pre-history or history.

CC-2 CEQA Guidelines § 15064.5(a)(3). The DEIR should discuss potential impacts to historical resources consistent with these requirements. See *Architectural Heritage Assoc. v. County of Monterey* (2004) 122 Cal.App.4th 1095, 1122.

CC-3 The DEIR's discussion of land use impacts is insufficient. The DEIR acknowledges about "15,900 acres of land designated for agricultural uses." DEIR at 3.1-1. While the EIR mentions that the San Pasqual Valley should be retained as agricultural land, it fails to address impacts associated with the possible loss of such lands. *Id.* at 3.1-3. The DEIR also fails to adequately consider impacts to affordable housing.

CC-4 The DEIR fails to provide an adequate discussion of noise impacts. Compliance with existing noise standards is not necessarily sufficient, particularly where a location already suffers noise impacts. See *Berkeley Keep Jets Over the Bay Comm. v. Board of Port Commissioners* (2001) 91 Cal.App.4th 1344, 1381.

CC-5 The DEIR fails to discuss the adequacy of water supply for the Project. *Santa Clarita Organization for Planning the Environment v. County of Los Angeles* (2003) 106 Cal.App.4th 715, 721-22. There is no showing that an adequate supply of water will be available. The DEIR also fails to analyze the impacts associated with obtaining an adequate supply of water. See *Save Our Peninsula Comm. v. Monterey County Bd. Of Supervisors* (2001) 87 Cal.App.4th 99, 134.

CC-6 The Project is likely to have growth inducing effects, which are insufficiently addressed in the DEIR. The General Plan is likely to lead to further development in the area. Its growth-inducing effects will be significant on current conditions. See *Stanislaus Audubon Society v. County of Stanislaus* (1995) 33 Cal. App. 4th 144, 153.

CC-7 "Environmental considerations do not become submerged by chopping a large project into many little ones - which cumulatively may have disastrous consequences." *Bozimg v. LAFCO* (1975) 13 Cal.3d 263, 283 - 84. The DEIR fails to consider:

CC-2 The PEIR does discuss potential impacts consistent with the requirements. Items (A) through (B) are the criteria used to determine a resource's eligibility for the National Register of Historic Places (NRHP). A brief discussion of the NRHP is located in Section 3.6.1 of the PEIR, under the "Regulatory Framework" heading. The analysis in Section 3.6.3 under the "Impact Analysis" heading explains that the demolition or alteration of a National Register eligible resource (among many other types of resources) has the potential to result in impacts to historical resources. (It should be noted that the word "historical" as used in this document, refers to historic and archaeological resources.)

CC-3 Impacts associated with the possible conversion or loss of agricultural land to non-agricultural use is discussed and described as an environmental impact in Section 3.1.3, and in Section 5.1 under the "Agricultural Resources" heading.

Loss of affordable housing through displacement associated with development, redevelopment and infrastructure expansion is addressed in Section 3.12.3 of the PEIR. A detailed discussion of affordable housing can also be found in the City's Housing Element, adopted by the City Council on December 5, 2006. A summary of the Housing Element is presented on page 2-50 of this PEIR, and the Housing Element is available for review at the City Planning and Community Investment offices.

CC-4 The commenter is correct is stating "compliance with existing noise standards is not necessarily sufficient, particularly where a location already suffers noise impacts." However, compliance with standards is not the only criterion used in the PEIR to evaluate noise impacts. In addition to this standard, the PEIR also states that a significant noise impact could occur if implementation of the General Plan results in a substantial increase in the existing ambient noise levels or results in increased land use incompatibilities associated with noise (please refer to Sections 3.10.2-3 of the PEIR).

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- CC-5 The issue of water supply is addressed in Sections 3.14.1, 3.14.2-3, and in the Cumulative and Alternatives Sections of the PEIR. This information clearly identifies the sources of the City's water supply, facilities used to convey that supply, plans to ensure its adequacy for the future population identified in the General Plan, and environmental impacts associated with obtaining an adequate supply of water.
- CC-6 The City's population will increase whether or not the General Plan is adopted. The General Plan goals and policies are intended to provide a framework to manage and plan for future population growth in the City. The General Plan policies encourage redevelopment, infill, and new growth in compact mixed-use areas, rather than development of the remaining four percent of the City's vacant land. In spite of this, the PEIR does acknowledge that the General Plan can be considered growth inducing because the Plan's policies are intended to foster economic expansion, and because future infrastructure improvements could remove obstacles to growth in some locations. This discussion is presented in Section 5.1 of the PEIR.
- CC-7 Pursuant to Section 15130 (b)(1)(B) of the CEQA Guidelines, the analysis of cumulative effects of the General Plan is based on the regional growth projections provided by the San Diego Association of Governments "2003 Regional Growth Forecast Update." The General Plan cumulative impact analysis is presented on pages 5-1 through 5-34 of the PEIR. Within those pages, cumulative impacts associated with implementation of the General Plan are described for the following topics: agricultural resources, air quality, biological resources, geologic conditions, health and safety, historic resources, hydrology, land use, mineral resources, noise, paleontological resources, population and housing, public services and facilities, public utilities (including water supply), traffic, visual effects and neighborhood character, water quality and global warming.

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cumulative impacts associated with the many activities in the area. See *RiverWatch v. County of San Diego* (1999) 76 Cal. App. 4th 1428, 1455.

INADEQUATE MITIGATION AND ALTERNATIVES ANALYSIS

CEQA requires that an EIR "produce information sufficient to permit a reasonable choice of alternatives so far as environmental aspects are concerned." *San Bernardino Valley Audubon Society v. County of San Bernardino* (1984) 135 Cal.App.3d 738, 750— 51. [T]he discussion of alternatives shall 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, or would be more costly." CEQA Guidelines § 15126.6(b). "Without meaningful analysis of alternatives in the EIR, neither the courts nor the public can fulfill their proper roles in the CEQA process." *Laurel Heights Improvement Assoc. v. University of California* (1988) 47 Cal.3d 376, 404.

CC-8 The DEIR fails to consider mitigation or alternatives for several impacts. Consider, for example, the DEIR' failure to consider mitigation or alternatives to impacts to agricultural resources. DEIR at 3.1-3. There is a similar problem with the DEIR's discussion of impacts from construction. *Id.* at 3.2-16. In this and many other areas, there is no discussion of standards appropriate to reduce or eliminate impacts.¹

CC-9 Furthermore, the Project and its objectives are defined too narrowly, thereby resulting in a narrowing of the consideration of alternatives to the Project. See *Rural Landowners Assoc. v. City Council* (1983) 143 Cal.App.3d 1013, 1024 ("Responsibility for a project cannot be avoided merely by limiting the title or description of the project").

CC-10 Additionally, CEQA requires that the "no project" alternative "discuss the existing conditions ..., as well as what would be reasonably expected to occur if the project were not approved, based on current plans and consistent with available infrastructure and community services." CEQA Guidelines § 15126.6(e)(2). The DEIR does not consider a "no project" alternative consistent with this requirement.

NEED TO RECIRCULATE THE EIR

CC-11 Recirculation of an EIR is required whenever the lead agency adds significant new information. Pub. Res. Code § 21092.1; *Laurel Heights Improvement Assoc. v. University of California* (1993) 6 Cal.4th 1112, 1130. In this instance, the DEIR is sufficiently lacking that the only way to fix these issues is to revise it and recirculate an adequate report.

¹ Contrast this with the discussion of mitigation measures identified to reduce impacts associated with criteria pollutants. DEIR at 3.2-17.

CC-8 The PEIR does consider mitigation for environmental impacts associated with implementing the General Plan. As described on the first page of Section 3.0 of the PEIR, each environmental topic subsection (3.1 through 3.17) includes discussion of a mitigation framework which combined with the General Plan policies provides guidance in the development of project specific mitigation measures. Potential mitigation measures for impacts to agricultural resources are identified on page 3.1-5 under the "Mitigation Framework" heading.

The proposed General Plan and the four "build" alternatives would result in similar impacts on agricultural resources. However, CEQA does not require the inclusion of alternatives to avoid or reduce all of the General Plan potentially significant impacts. In fact, it is unlikely that such an alternative could be developed, as the PEIR identifies the potential for significant and unavoidable impacts in all issue areas. Instead, CEQA requires analysis of a reasonable range of project alternatives that will foster informed decision-making and public participation (CEQA Guidelines section 15126.6 (a)).

The alternatives presented in the PEIR represent a reasonable range alternative to the proposed General Plan and are a result of collaboration between DSD and Planning Department staff and discussion with other environmental professionals with experience in preparing regional level environmental documents.

CC-9 The General Plan and its objectives were developed through a series of citywide planning efforts which began in 1999. It included five phases of public outreach, four public reviews of the plan and some of the elements, workshops with the Planning Commission and the Land Use and Housing Committee, and over 250 workshops, forums, presentations, and working meetings with community planning groups. Input from this comprehensive outreach program is represented by ten objectives listed on pages 27 and 28 of the PEIR. Rather than being too narrowly defined, these objectives are commensurate with the broad nature of

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subjects addressed in a General Plan and input received during the public outreach program. Regarding the range of alternatives, please see response CC-8.

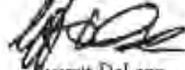
- CC-10 When the project is the revision of an adopted land use policy, the appropriate No Project alternative is the continuation of the existing plan, policy, or operation into the future (State CEQA Guidelines Section 15126.6(e)(3)(A)). The No Project alternative prepared in accordance with this section of the CEQA Guidelines is presented in Section 7.3.2 of the PEIR.
- CC-11 The commenter is correct in stating that an EIR must be recirculated whenever the lead agency adds significant new information. See response CC-1.
- CC-12 The Friends of San Diego's request is noted and incorporated into the administrative record for this project.

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CONCLUSION

For the foregoing reasons, Friends of San Diego requests that the City reject the DEIR as drafted. If you have a question or need additional information, please contact me. Thank you for your consideration of these comments.

Sincerely,



Everett DeLano

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June 25, 2007

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by email: mmirrasoul@sandiego.gov

Re: Comments on Draft Program EIR for Draft General Plan
Project No. 104495, SCH No. 2006091032

Dear Ms. Mirrasoul:

These comments on the Draft Program EIR's treatment of historic resources are submitted on behalf of Save Our Heritage Organisation.

A. Section 3.6.3 (Impact Analysis)

1. Inconsistent Statements Regarding Significant Impacts

DD-1

a. The EIR claims that "[a]lthough future development in accordance with the General Plan could have a significant impact on historical resources, adoption of the Plan would not, in and of itself, have a significant impact." (EIR 3.6-8.) This statement is misleading; the adoption of the Plan leads to impacts and thereby has its own impacts, as reflected in the EIR's conclusions that "the impact to historical resources is considered significant and unavoidable" (EIR 3.6-23) and

[b]ecause the degree of impact and applicability, feasibility, and success of [the General Plan's historic preservation policies, and "historical resource protections" in the Land Development Code and CEQA] cannot be accurately predicted for each specific project at this time, the program level impact related [sic] historical resources is considered significant and unavoidable.

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DD-1 The comment refers to a statement on Page 3.6-8 regarding future development in accordance with the General Plan. Although staff concurs that the paragraph is confusing and as such, it has been deleted, with implementation of the General Plan, potentially significant impacts to historical resources could result. However, conformance with the goals and policies included in the plan and strict compliance with the City's Historical Resources Regulations, Historical Resources Guidelines, and the provisions of CEQA would help to reduce potential future project related impacts, but not necessarily to a level below significance with adoption of this plan because project level impacts cannot be predicted at this time.

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(EIR 3.6-9.) For consistency and accuracy, the confusing statement that "...adoption of the Plan would not, in and of itself, have a significant impact" should simply be deleted. (EIR 3.6-8.)

DD-2

b. The EIR states that "the emphasis placed by the General Plan on conserving historical resources and integrating the protection of historical resources into the broader planning process *would reduce impacts* to historical resources that may have otherwise occurred with future projects." (EIR 3.6-8, italics added.) This statement should be deleted. Because the General Plan does not mandate conservation of historic resources, there is no substantial evidence that its policies will reduce impacts.

2. Additional Impacts Analysis Needed

a. The EIR acknowledges that "[b]ecause less than four percent of the City's land remains vacant and available for new development, the [General] Plan's policies represent a shift in focus from how to develop vacant land to how to reinvest in existing communities." (EIR 1.0-2.) The General Plan therefore "direct[s] growth primarily toward village centers..." (EIR 1.0-2.) In documents such as the 2002 Opportunity Areas Map and the General Plan's Village Propensity Map, the City has identified areas likely to be developed with higher-density structures. The Village Propensity Map should identify areas with significant concentrations of potential and designated historic resources, to make the General Plan's likely impacts on historic resources more clear. In EIR Chapter 3.6, please explain that the City of Villages program, with density and intensity increases, is likely to place more development pressure on historic resources, and provide analysis of what can be done to prevent the loss of historic resources.

DD-3

B. Section 3.6.4 (Mitigation Framework)

1. Inadequate Discussion of Current Procedures

a. At the beginning of the "Mitigation Framework" section, the EIR states that "[i]ncluded here are more detailed measures that are currently applied to projects that could impact historical resources. *It should be noted that at the time of this rating, these measures are generally considered to be adequate mitigation*" (EIR 3.6-9, italics added.) What is the legal basis of the claim that "these measures are generally considered to be adequate mitigation"? Who made that determination?

DD-4

b. The EIR states that if a building or structure does not meet certain criteria (listed in or determined eligible for listing in the National Register, California Register, or San Diego Register; or meeting the CEQA definition of "historical resource") and "substantial alteration or demolition is proposed the following measures are typically

DD-5

DD-2 See response to comment DD-1.

DD-3 It should be noted that the draft General Plan does not change land use designations but sets the framework for future community plan updates. While doing the analysis of the potential future effects of implementing the General Plan policies necessarily involves some degree of forecasting, identifying specific examples of what *could* happen as a result of a future community plan update, amendment, or development proposal is too speculative for detailed evaluation at the General Plan level. Implementation of the General Plan policies would provide mitigation at the program level. The project-specific procedures, as detailed in PEIR Section 3.6-9 (which would be updated as new information becomes available), would be implemented to determine the likelihood for resources to be present, additional investigation required, and the required project-specific mitigation.

DD-4 See response to comment W-10. Public Resources Code Section 21081.6, which took effect on January 1, 1989, requires that a public agency adopt a reporting or monitoring program for the changes made to the project or as conditions of project approval adopted in order to mitigate or avoid significant effects on the environment. The section further required that the reporting or monitoring program be designed to ensure compliance during project implementation, and applies to both public and private projects. As a result, the City of San Diego began development of a Mitigation, Monitoring and Reporting Program (MMRP) Guideline. These guidelines were ultimately adopted by the City Council in 1991, and established a program for developing mitigation measures to be included as conditions of project approval and for monitoring the implementation of such conditions. In addition, the mitigation measures and CEQA project review procedures (Steps) included in the General Plan EIR were developed by qualified environmental staff in consultation with Historical Resources Board staff, as well as the professional historical and archaeological community. These measures provide assurance and accountability before, during and after construction related activities. Although these measures are not static and are based on the results of technical analysis for the effected resource, they are intended to be

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required as a condition of the permit." (EIR 3.6-10.) It then lists fourteen pages of unidentified "measures" for "[h]istorical architectural building alteration, construction, restoration, or relocation." (EIR 3.6-10—3.6-23.) What are the source(s) for the procedures listed on pages 3.6-10 through 23?

c. Why did the EIR selectively quote these procedures and omit other relevant historic preservation procedures followed by the City of San Diego? Please list and discuss all of the procedures listed in San Diego Municipal Code that address or impact historic resources, including without limitation Chapter 12, Article 3, Division 2, Sections 123.0201, *et seq.* (Designation of Historical Resources Procedures) and Chapter 14, Article 3, Division 2, Sections 143.0201, *et seq.* (Historical Resources Regulations). What other San Diego procedures apply to historic resources?

DD-6

d. The EIR states that "if the building/structure has *been previously determined* not to meet any of these four criteria [listed in or determined eligible for listing in the National Register, California Register, or San Diego Register; or meeting the CEQA definition of "historical resource"], no additional action will be required." (EIR 3.6-10, italics added.) Is this an already-adopted San Diego policy, procedure, or regulation? If so, please identify it.

DD-7

The EIR statement that "no additional action will be required" violates CEQA and should be deleted. When CEQA review is conducted for a proposed project, the "environmental setting" (baseline physical conditions) describes the existing environmental conditions when the notice of preparation is published or when environmental analysis begins. (*E.g.*, CEQA Guideline § 15125(a).) The CEQA Guidelines state that "[s]pecial emphasis should be placed on environmental resources that are rare or unique to the region and would be affected by the project." (Guideline § 15125(c).) Potential historic resources are in this category. To provide an accurate environmental setting, the City must assess whether historic resources exist, evaluated at the onset of the environmental review. The City cannot simply rely on previous historic evaluations, because new information or a more complete analysis may determine that the resource is historic at the time CEQA review is conducted. Please revise the EIR to state that current historic evaluations and/or updates will be conducted, as appropriate, as part of the environmental review for every proposed project.

DD-8

C. Section 3.6.5 (Significance of Impact With Mitigation Framework)

1. Need for Analysis of Feasible Mitigation Measures

As noted above, EIR Chapter 3.6 (Historical Resources) acknowledges that "the impact to historical resources is considered significant and unavoidable." (EIR 3.6-23.) The CEQA Guidelines mandate that "[a]n EIR shall describe feasible measures which

DD-9

RESPONSES

modified when necessary on a case by case basis and when site specific mitigation is required.

DD-5 See response to comment W-10 and DD-4.

DD-6 See response to comment W-10 and DD-4. In addition, the CEQA project review procedures (Steps) included in the General Plan EIR have been revised to clarify the process for determining whether a historical resource is present on the project site and if further analysis is required. These Steps ultimately could lead to project redesign, avoidance, preservation and/or designation of the resource. The mitigation measures included in the General Plan EIR would be incorporated into an environmental document based on the scope of the project and level of impact to the resource.

DD-7 As noted on Page 9 of the adopted City of San Diego Historical Resources Guidelines (September 2001), historical resource evaluations are required when new resources are identified as a result of the survey, when previously recorded resources that have not been previously evaluated are relocated during the survey, and when previously recorded sites are not relocated during the survey if there is a likelihood that the resource still exists. Evaluations will not be required if the resource has been evaluated for CEQA significance or for National Register eligibility within the last five years if there has been no change in the conditions which contributed to the determination of significance or eligibility. A property should be re-evaluated if its condition or setting has either improved or deteriorated, if new information is available, or if the resource is becoming increasingly rare due to the loss of other similar resources. As such, the referenced paragraph in Section 3.6.1 of the General Plan EIR has been revised accordingly to be more consistent with the City's Historical Resources Guidelines.

DD-8 See response to comment DD-7.

COMMENTS

RESPONSES

DD-9 See response to comments W-10, DD-4 and DD-6. Additionally, because the General Plan is not proposing projects, site specific mitigation cannot be identified at this time. The measures included in the EIR are intended to address direct impacts on the environment when the resource is designated and/or when there is a potential for unknown resources to be encountered during construction related activities. Project level analysis could identify additional measures, consistent with CEQA which would further reduce potential impacts to below a level of significance.

COMMENTS

RESPONSES

Letter to Marilyn Mirmsoul
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could minimize significant adverse impacts..." (Guideline § 26.4(a)(1), italics added.) However, the EIR fails to identify and analyze a single mitigation measure to reduce or avoid significant impacts to historic resources.

DD-10 The EIR states that "[a]lthough significant impacts to historical resources may be mitigated through review of discretionary projects, specific mitigation at the program EIR level is not available since specific development projects are not known. Therefore, the impact to historical resources is considered significant and unavoidable." (EIR 3.6-23.) Isn't this conclusory statement inadequate, as explained below?

DD-11 Guideline Section 15168 states that an advantage to using a program EIR is that it can "[p]rovide an occasion for a more exhaustive consideration of effects and alternatives than would be practical in an EIR on an individual action," and it can "[a]llow the lead agency to consider broad policy alternatives and program wide mitigation measures at an early time when the agency has greater flexibility to deal with basic problems or cumulative impacts." (Guideline § 15168(b)(1) and (5).) Isn't it true that the EIR fails to realize the advantages of program EIRs by refusing to analyze mitigation measures and alternatives that would reduce or avoid historic resource impacts?

DD-12 The public notice for the EIR states that for each environmental issue, the EIR included a "Mitigation Framework" to identify ways to reduce or avoid potentially significant impacts, and that "[s]tandard existing regulations, requirements, programs, and procedures that are applied to all similar projects were taken into account *in identifying additional project specific mitigation that may be needed to reduce identified significant impacts.*" (Page 2, italics added.) As noted above, the Mitigation Framework selectively quotes a small fraction of existing procedures affecting historic resources *and* fails to identify a single "additional project specific mitigation that may be needed to reduce identified significant impacts."

Please revise the EIR to identify and analyze feasible mitigation measures and alternatives, and to otherwise improve the draft General Plan. For example:

DD-13 a. The draft Historic Preservation Element includes a policy to "[c]omplete a comprehensive citywide inventory of historical and cultural resources..." (HP-13, Policy HP-A.4(b).) The importance of such a survey cannot be overstated, especially since the General Plan allows intensified development throughout the City. The survey would provide project applicants with information about whether their parcels are historic or potentially historic, and this information will make the development process more efficient and predictable. It will also encourage development to focus on non-historic areas. As noted above, pursuant to CEQA, a historic evaluation or update of an existing evaluation would still occur during the environmental review for each project, but the survey would help guide the process. Therefore, it is critical to prioritize work on the

DD-10 See response to comment W-10, DD-4, DD-6 and DD-9.

DD-11 See response to comment W-15. Staff does not concur with the statement that the EIR fails to realize the advantages of a program level analysis. The General Plan EIR provides a program level Mitigation Framework which establishes a baseline for the methods of identifying, evaluating and recording historical resources. The information contained in these steps should not be seen as inclusive and would be used by Environmental staff in conjunction with the City of San Diego's Historical Resources Guidelines. The program level Mitigation Monitoring and Reporting Programs identified in the EIR would be considered for use after thorough analysis and review of technical reports at the time individual projects are submitted and evaluated in accordance with CEQA and all applicable regulations. The measures would then be incorporated into a project specific CEQA document for public review and consideration by the appropriate decision-making body of the City.

DD-12 See response to comment W-10, DD-4, DD-6 and DD-9.

DD-13 It is anticipated that historical resources surveys will be completed as part of community plan updates, which will be funded in part from development fees. Surveys may be conducted outside of the community plan update work program, if other funding sources are available. Historical resources surveys are included in the Historic Preservation Element section of the General Plan Action Plan.

COMMENTS

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survey for areas identified as likely development targets in the General Plan. Please identify those areas, prioritize survey work there, and establish a timeline to perform the survey. Also, shouldn't the City require project applicants to contribute money to help fund the survey?

DD-14

b. Because many historic designations depend, in part, on a structure's age (e.g., the 45-year guideline identified in the EIR at 3.6-9—3.6-10), additional resources become historic every year. Therefore, a historic survey is never really "complete," but is ongoing and requires regular updates. Please change Policy HP-A.4(b) in the Historic Preservation Element to read, in relevant part, "[c]omplete and regularly update a comprehensive citywide inventory of historical and cultural resources... (HP-13, Policy HP-A.4(b).)

DD-15

c. Using historic surveys, the City's Historical Resource Sensitivity Maps, historic district maps, Mills Act contracts, planning documents, and information from Save Our Heritage Organisation, the California Historical Resources Information System, the State Office of Historic Preservation, and all other relevant sources, the City should create a map identifying areas with significant concentrations of potential and designated historic resources (and the greatest potential loss of those resources). Using the Opportunity Areas Map, the Village Propensity Map, and other relevant sources, this new map should also include locations in the City that are likely to be targeted for more intensive development under the General Plan. Areas containing historic resources at increased risk of development pressure should be designated as special historic study or high-risk areas. The City should create a timeline for adopting policies that ensure the maximum preservation of these high-risk areas. For example, the City should prohibit community plan amendments and rezones that would increase allowable intensity until a specific preservation plan is adopted for these areas.

DD-16

d. The draft Preservation Element contains a policy to "[p]ursue the use of identifying conservation areas at the community plan level, based on historical resource surveys, to maintain community character and provide a buffer area between designated historical districts and areas expected to redevelop at higher densities." (HP-12, Policy HP-A.2(d).) It also contains a policy to "[e]stablish historical districts where concentrations of buildings, structures, landscapes, and objects are identified... (HP-14, Policy HP-A.5(b).) The City should prioritize the evaluation of potential conservation and historic districts before allowing intensified development. The City should also establish an advisory committee or neighborhood group, or contact an established preservation group, to set up monitoring of established districts.

DD-17

e. The draft Preservation Element contains a policy to "[e]ncourage the use of Transfer of Development Rights to preserve historical and cultural resources in site, particularly in areas zoned for high-density development." (HP-17, Policy HP-B-2(e).)

DD-14 The General Plan has been revised as suggested.

DD-15 Creation of a map identifying areas with significant concentrations of potential and designated historical resources has been added to the Historic Preservation Element section of the General Plan Action Plan.

DD-16 Potential conservation areas and historic districts may be identified through the community plan update process. The City agrees with the need to monitor both historic districts and individually designated historical resources to assure compliance with the Land Development Code and any Mills Act agreement conditions.

DD-17 Adoption of a comprehensive TRD program tailored for historical resources is included in the Historic Preservation Element section of the General Plan Action Plan.

COMMENTS

RESPONSES

Letter to Marilyn Mirasoul
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Before development can proceed under the new General Plan, the City should prioritize the adoption of a comprehensive TDR program tailored for historic resources, to provide a valuable incentive to preserve and restore them instead of demolishing them.

DD-18 These suggestions and other potential mitigation measures are feasible and would help reduce impacts to historic resources. Save Our Heritage Organisation respectfully requests a meeting to discuss these and other ideas with the City before the Final EIR is prepared.

D. What Feasible Alternatives Would Reduce Historic Resource Impacts?

DD-19 CEQA Guideline section 15126.6(a) mandates that an EIR "shall describe" a range of reasonable project alternatives "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... The EIR analyzes four alternatives: "No Project," "Enhanced Sustainability," "Increased Parking Management," and "Concentrated Growth" (E.g., EIR 1.0-4—1.0-6.) The EIR concedes that the "No Project," "Enhanced Sustainability," and "Increased Parking Management" alternatives would have impacts to historic resources similar to those attending the Draft General Plan. (EIR 1.0-4—1.0-6.) Under the "Concentrated Growth" alternative, the EIR projects that environmental impacts would increase in four City subareas¹ — which contain historic resources. How do these alternatives reduce significant impacts to historic resources?

Thank you for your consideration. Please feel free to contact us if we can assist you in any way.

Sincerely yours,

Susan Brandt-Hawley
Paige J. Swartley

cc: Save Our Heritage Organisation

¹ The four subareas are: Downtown San Diego and Uptown Communities; and Urban Village Centers within the Mission Valley/Morena/Grantville, University/Sorrento Mesa, and Midway-Pacific Highway subareas. (DPEIR 1.0-6.)

DD-18 Comment noted.

DD-19 As stated previously, at the General Plan level what *could* happen as a result of a future community plan update, amendment, or development proposal is too speculative for detailed evaluation at the General Plan level. Therefore, it is difficult to ascertain with certainty which alternatives would result in a significant impact to historical resources. In contrast to the other alternatives, the Concentrated Growth Alternative would focus growth into four subareas that are known to be of high sensitivity for historical resources; therefore, it was anticipated that impacts to historical resources would be greater under that alternative.



June 7, 2007

Marilyn Mirrasoul
Environmental Planner
City of San Diego Development Services
1222 First Avenue, MS 501
San Diego, CA 92101

Re: PEIR, Project NO. 104495

Dear Ms. Mirrasoul,

The Mineral Resources paragraph of the draft Program EIR for the General Plan update contains the following language: "No Mitigation Measures are available at the Program EIR level of review that could reduce significant impacts to important mineral resources." I believe that comment is incorrect.

EE-1 The State Surface Mining & Reclamation Act (SMARA) requires that lands set aside for mineral extraction should be protected from competing land uses. At the very least, mitigation for lands designated MRZ-2 which have been removed from potential production should include designation of other lands for mineral extraction. The PEIR should address such mitigation measures.

Thank you for the opportunity to comment on the draft PEIR.

Sincerely,

Bruce H. Warren, AICP
Principal Planner

3511 Camino Del Rio South, Suite 403 - San Diego, CA 92108
(619) 284-8515/(800) 755-3995 - Fax: (619) 284-0115

EE-1 The draft Program Environmental Impact Report utilized the Development Services Department's existing Significance Determination Thresholds for the establishment of a mitigation framework for the environmental issue areas. These thresholds do not contain specific mitigation for impacts to mineral resources and call out as significant impacts to mineral resources where mining could be feasible. The City contains few lands not already under production that would be appropriate for the extraction of such resources. Therefore, the City will continue to address this issue and determine mitigation on a case-by-case basis.

Comments and Questions Pertaining the Draft General Plan
 Program EIR - prepared by Lee Campbell 6/24/07
 Project No. 104495, SCH No. 2006091032

1. Para 1.2 states:

'Because less than four percent of the City's land remains vacant and available for new development the Plan's policies represent a shift in focus from how to develop vacant land to how to reinvest in existing communities. Therefore, the City has drafted new policies and programs to support changes in development patterns to emphasize combining housing, shopping, employment uses, schools, and civic uses, at different scales, in village centers/

It appears from the above quote, that with the implementation of the city of villages/ general plan creating traffic corridors through the villages that are now communities with defined character, the city plans to be in a perpetual redevelopment mode. Communities that now are planned communities will likely begin to look like truck stops.

FF-1 Could the general plan a plan for perpetual redevelopment? If not please explain?

2. Maps are not of sufficient resolution on the dvd copy to use In many cases. See land use 3.8-1.

FF-2 a. Will you correct and if not then explain why? Are the maps in the PEIR provided from the Draft General Plan database?

FF-3 b. Why is it that map 3.3-2 does not show the area between Rueda Drive and MTRP at Via Promesa and Palabra Ct. as MHPA? See excerpt below.

FF-1 The State of California mandates that all local jurisdictions prepare a general plan that establishes policies and standards for future development, housing affordability, and resource protection. The PEIR project summary describes the General Plan as the "long range, comprehensive framework for how the City could grow and develop, provide public services, and maintain the qualities that define San Diego for the next 20-plus years." The general policy direction for the General Plan update was provided by the adopted Strategic Framework Element which includes the City of Villages growth strategy. The City of Village concept is a land use and growth strategy that supports the development of mixed-use village centers served by higher frequency transit service.

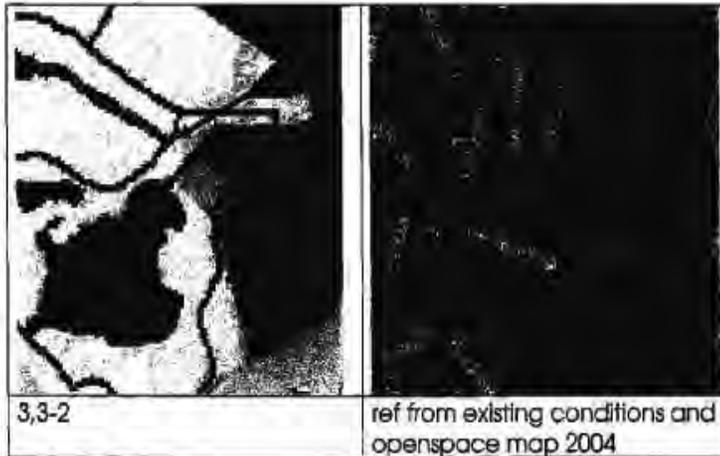
The General Plan does not establish new redevelopment areas nor does it identify village areas. Village area criteria is incorporated into the General Plan, however site specific village locations will be identified at the community plan level. The General Plan is a comprehensive policy document that intends to guide all development in the City, not just those areas that may become village locations. Individual property owners have the right to pursue development opportunities on their property and the General Plan policies will be used to guide these urban infill and revitalization efforts.

FF-2 Many of the maps used in the PEIR are the same maps used in the General Plan. The PEIR Figure 3.8-1 Map, Generalized Land Use and Street System Map, is a generalized land use map and is also referred to in the General Plan as Figure LU-2. The map is a composite of the more detailed land uses and circulation system maps found in each community plan and is an illustrative map to show the Cities diversity of land use and how it is dispersed around the City. For specific land use designations and street circulation information refer to the adopted community plans which are available on-line on the City's CPCI Department's web site or offices at 202 'C' Street, 4th floor.

FF-3 The PEIR and General Plan do not provide site specific mapping or analysis. Map information provided is a composite of the City's adopted community land use plans and does not change the underlying designations of those documents.

COMMENTS

RESPONSES



- FF-4** c, Maps show Clairemont Mesa Blvd connected to Colina Dorada in Tierrasanta when Calle de Vida intersects Rueda and Rueda intersects Clairemont Mesa Blvd. (see fig. segment 3.3-2 above) Will you correct and if not then please explain why?
- FF-5** d, Figure 3.15-1 "Existing and Proposed Bikeways" shows a bikeway connecting from Tierrasanta Blvd to Mission Gorge Rd. The proposed bikeway was requested to be removed from the Master Bicycle Plan and from the Tierrasanta Community Plan. (See below.) Please remove from Figure 3.15-1 or explain why it will not be removed.
- FF-6** e, the bikeway referenced above is diagramed in figure 3.15-1 on U.S. Government open space land. Although this route was suggested by a citizen as a possible alternative route and was not to be strictly a bicycle route but was suggested to be a multiuse trail it was never brought before the public for review and is not consistent with the Tierrasanta community plan. Please remove for the map and explain why if not removed?

- FF-4 See response to comment FF-3. Please refer to the adopted community plans for site specific circulation and bike path recommendations. All roadway classifications and connections are assumed to be planned as indicated in the latest adopted Community Plan unless a community plan amendment has been completed and approved by City Council. The roadway connections mentioned in the May 8, 2002 memo from Councilmember Jim Madaffer; Tierrasanta Boulevard, Clairemont Mesa Boulevard and Santo Road have not been officially deleted from the Tierrasanta Community Plan via the community plan amendment process.
- FF-5 The City's Bicycle Master Plan is currently being updated and the Community's request to delete the bikeway connection from Tierrasanta Blvd to Mission Gorge Road has been acknowledged and will be proposed as part of the update. If the City Council approves the deletion of this bikeway, then it will be reflected in the plan.
- FF-6 See response to comment FF-4.



THE CITY OF SAN DIEGO

TR 264,113

August 7, 2002

Mr. Stephen Vance
Senior Transportation Planner
SANDAG
401 'B' Street, Suite 900
San Diego, CA 92101

Dear Mr. Vance:

The San Diego Association of Governments (SANDAG) awarded the City of San Diego a total of \$410,000 in Transitlet Bikeway grant funding in Fiscal Year 2002 for the design of Tierrasanta Bike Path. Of the total grant amount, a \$205,000 payment has been made to the City.

Some preliminary engineering work as well as consultant interviews have been conducted for the Tierrasanta Bike Path project. The project has also been presented to the Tierrasanta Community Council twice. The community voiced strong opposition to the proposed bike path and requested that the project be cancelled. Councilmember Jim Madaffin held a public meeting discussing the project and the community took a vote against it. In addition, the City Council directed City staff to amend the Tierrasanta Community Plan and the Bicycle Master Plan to delete the proposed bikeway between Tierrasanta Boulevard and Mission Gorge Road. Therefore, the City will be cancelling this project and returning to SANDAG a balance of \$184,800 out of the \$205,000 payment received.

If you have any questions, please contact Sam Harris at (619) 533-3088.

Sincerely,

Gregory V. Way
Gregory V. Way
Senior Culture Coordinator

RVB:jm

- cc: Councilmember Jim Madaffin, City Council District Seven
- Aimee Faucett, Chief of Staff, City Council District Seven
- D. Cruz Gonzalez, Director, Transportation Department
- Allen Holden, Deputy Director, Traffic Engineering Division
- Ali Darvishi, Associate Civil Engineer, Traffic Engineering Division
- Marilyn Nguyen, Accountant, Auditor and Comptroller
- Karin Gofrens, Accountant, Auditor and Comptroller
- Andrew Field, CIP Coordinator, Financial Management



Traffic Engineering Division • Transportation
1915 Second Avenue, Suite 900 • San Diego, CA 92101
Tel: 619 533-3111 Fax: 619 533-3111

FF-7

f, Figure 3.15-3 'Existing and planned Circulation', shows Santo Road extended to Friars Road as an existing linkage. This road extension and other road extensions have been requested to be removed from the City circulation elements. See insert below for the text of the request which includes Santo Road. Please remove or explain why it is shown as an existing linkage?

FF-7 See response to comment FF-4.

City of San Diego
COUNCILMEMBER JIM MADAFFER
DISTRICT SEVEN
MEMORANDUM

M 02-05-02 *Please refer to this number when responding to this memo*

DATE: May 8, 2002

TO: City Manager Michael Uberuaga

FROM: Councilmember Jim Madaffer

SUBJECT: Tierrasanta Community Plan Update

There is an issue that surfaces from time to time that sirs confusion and fear in the Tierrasanta community. This issue is the proposed extension of four roads that would change the character of Tierrasanta forever.

Several planning documents, including the Tierrasanta Community Plan and the Tierrasanta Public Facilities Financing Plan, reference these road connections that the community and that I, for nearly 20 years as a Tierrasanta resident, have clearly stated we are not interested in.

The Tierrasanta Community Plan is in desperate need of an update, as it has been decades since the last one. I have recently received a letter from the Tierrasanta Community Council formally asking me to initiate a community plan update.

In order to once and for all dispel any fear or confusion among residents of Tierrasanta with regard to any road extensions, I am requesting that the Tierrasanta Community Plan be updated immediately and that the following projects be removed:

PROJECT NUMBER	PROJECT DESCRIPTION
47-04B	Tierrasanta Boulevard-Colina Dorado to Mission Gorge Road
47-06B	Clairemont Mesa Boulevard-Rueda Drive to Jackson Drive
47-07	Jackson Drive-Mission Gorge Road to SR52
47-11	Santo Road-Patriot Street to Ambrosia Drive

The Tierrasanta Community Council should be directly involved in the process to ensure that there is adequate community input.

Thank you for your prompt attention to this matter.

COMMENTS

3, Para 2.2 starting page 2-15 and Figure 2.2-7 'fire response graduated timing'

- FF-8** a, Please identify on the map where the 22 additional stations should be located?
- FF-9** b, If the exact locations cannot be identified then will you identify the communities and the number of additional stations needed for each community and if not explain why?
- FF-10** c, will you provide time stats from the time that the dispatcher receives the call (picks up the phone) until the fire unit(s) is noticed under both day and night conditions and if not then explain why?
- FF-11** d, Was San Diego compared to the national average for response times to fires how does San Diego compare?
6. See insert below:
- FF-12** a, With the 1979 progress guide and general plan providing a very strong statement that protects communities from through traffic, what is the explanation for how neighborhood character impacts that 'may remain significant and unavoidable' under the program plan (where the city communities will become 'freeway on-ramps for adjacent communities') will be 'similar' (that is, may remain significant and unavoidable) under the no project plan?
- FF-13** b, If this statement ('may remain significant and unavoidable' under the program plan) applies to not all communities please identify which communities with their level of impact for both plans?

RESPONSES

- FF-8** The existing conditions of the Fire-Rescue Service are discussed in the Project Description, Section 2.0, of the PEIR. The siting and location of new stations is not within the scope of the PEIR or General Plan effort. The PEIR states that "*The Fire-Rescue department is in the process of preparing a Fire Station/Lifeguard Facility Master Plan to identify a phased approach for the development of fire stations and lifeguard facilities that will address siting, priority of construction, and funding.*" However, the Fire-Rescue department has model predictions for nine additional fire stations planned through FY 2012. Beyond FY 2012, the Fire-Rescue department has projected the need to add an additional 13 fire stations in communities that are not adequately covered based on current data. However, a phased plan to build these 13 stations is not complete and it is unknown when, if, and where the stations will be located. The Fire Station Master Plan is anticipated to be completed by the end of 2007, and will provide more detailed information on location.
- FF-9** See response to comment FF-8.
- FF-10** The General Plan provides policies in the Public Facilities, Services and Safety Element, Section D. Fire-Rescue which call for attainment of established response times as well as additional more detailed level of service and response time objectives. Additional information regarding the National Fire Protection Association 1710 standards and the Master Plan has been included in the PEIR.
- FF-11** This data is not available at this time and was not available when the Standards of coverage was prepared several years ago.
- FF-12** This comment asserts that the 1979 General Plan offers more protection to communities from through traffic, and thus questions the EIR analysis of potential community impacts associated with the Draft General Plan as compared to the No Project (1979 General Plan) Alternative. The reviewer is correct that as a matter of policy, the Draft General Plan seeks to attain greater street connectivity than the 1979 General Plan. However, street connectivity is to be achieved through a design that minimizes "landform and community character impacts" and traffic calming

measures are to be installed “to reduce vehicle speeds or discourage shortcutting traffic” (see ME-C.3 and ME-C.5 and PEIR Section 3.8.3). The PEIR addresses the street connectivity issue under the following Threshold of Significance: “Physically divides an established community (see Section 3.8.2).” The PEIR concludes that potential impacts in this issue area are similar for the Draft General Plan and the 1979 General Plan. An additional sentence has been added to Section 7.3.2 under “No Project” to clarify that both plans offer policy protections for community character and rely on adopted community plan to establish the local street network.

- FF-13 Overall, the PEIR concludes that the project results in significant environmental impacts in all issue areas. Impacts were due to population growth and uncertainty of future actions, not due to specific General Plan policies. Impacts within each community are not known at the program level of analysis within this PEIR. Therefore, mitigation was not feasible at the program level, so most impacts remained “significant and unavoidable.” Future impacts and potential mitigation measures will be determined and analyzed at the community plan level and/or project level.

(Begin insert) the 1979 progress guide and general plan states the following:

on page 266:

- PROTECT THE RESIDENTIAL AREAS FROM THROUGH TRAFFIC,

Studies show that an increase of traffic on residential streets cause families to move, to withdraw from the street to reduce their feeling of responsibility for it. Cars are noisy, polluting, and dangerous. There are simple ways of controlling traffic volume and speed. Diagonal diverters can be built at four-way intersections; street entrances can be necked down, traffic islands erected. By making some gridiron streets into cul-de-sacs, while using the alleys for auto access, clustered parking can be provided, as well as open space for neighborhood use.

And page 274:

THE RATE AND CHARACTER OF DENSIFICATION SHOULD NOT DESTROY EXISTING COMMUNITY CHARACTER. Particular guidelines will be needed for each community. Guidelines can deal with the control of parking and paved areas, the provision of landscaping, the design of buildings so as not to destroy the privacy or overshadow smaller neighbors, the use of materials/ and the activities which front the street. It will depend on the neighborhood character to be preserved. Where possible residential streets should be short loops or cul-de-sacs. These streets tend to have a higher safety factor and a higher level of commitment from the residents. In general, additional units should be low, scattered, and added gradually. Relaxed spacing and density rules must be accompanied by new performance standards. Consideration should be given to reinstatement of those development regulations used in initial development of the community.
The 2006 draft gp Para 1.3, page 1.0-3 states:

The Program EIR determined that the Draft General Plan could result in significant project-level and cumulative impacts to each environmental issue area analyzed within the EIR, including: ... and neighborhood character,

And the draft General Plan states:
Para 1.3, page 1.0-5 states:
 The No Project Alternative would generally meet all of the project objectives. Impacts associated with ... and neighborhood character, ... would be similar compared to the Draft General Plan.

With the following as 'policies'!!!
The 2006 draft general plan Para ud -b.5 states:

b. Avoid closed loop subdivisions and extensive cul-de-sac systems, except where the street layout is dictated by the topography or the need to avoid sensitive environmental resources.

c. Design open ended cul-de-sacs to accommodate visibility and pedestrian connectivity, when development of cul-de-sacs is necessary.

(end insert)

FF-14 c. What is the analytical data for this similarity?

7. Analytical Data

FF-15 a. Is there another volume or set of work sheet for the PEIR that has not been provided to the public that contains the analytical data beyond the subjective and less than scientific discussion in section 5.0, Cumulative Impacts?

FF-16 b. If this volume(s) exists then please provide or explain why it will not be provided?

FF-14 There is no additional volume of analytical data for the EIR.

FF-15 See response to comment FF-14.

FF-16 See response to comment FF-14.

COMMENTS

RESPONSES

8. (see Table 7.4-1 below).

FF-17

a. Please provide in table form and explain the degree of confidence that was determined for each of the 'comparison of impacts by alternative' in Table 7.4-1. For example, for the 'No Project/... Traffic Impact identified as 'similar', is the degree of confidence 95%, 80%, etc?

b. If you cannot then explain why?

FF-17-19 The scientific methods recommended by the commenter is not a feasible approach for a program level EIR analysis of alternatives, nor is such an approach required by CEQA. The conclusions included within the PEIR are based on expert analysis and research given the data available.

**Table 7.4-1
Comparison of Impacts by Alternative**

Resource	Proposed Project	Enhanced Sustainability Alternative	Draft General Plan	Enhanced Sustainability Alternative	Draft General Plan
Agricultural Resources	Significant and unavoidable	Similar	Similar	Similar	Similar
Air Quality	Significant and unavoidable	Greater	Less	Less	Similar
Biological Resources	Significant and unavoidable	Similar	Similar	Similar	Similar
Geologic Conditions	Significant and unavoidable	Similar	Similar	Similar	Greater
Health and Safety	Significant and unavoidable	Similar	Similar	Similar	Greater
Historic Resources	Significant and unavoidable	Similar	Similar	Similar	Greater
Hydrology	Significant and unavoidable	Similar	Less	Similar	Similar
Land Use	Significant and unavoidable	Greater	Similar	Similar	Greater
Mineral Resources	Significant and unavoidable	Similar	Less	Similar	Similar
Noise	Significant and unavoidable	Similar	Similar	Similar	Similar
Paleontological Resources	Significant and unavoidable	Similar	Similar	Similar	Similar
Population and Housing	Significant and unavoidable	Similar	Similar	Similar	Less
Public Services and Facilities	Significant and unavoidable	Similar	Similar	Similar	Similar
Public Utilities	Significant and unavoidable	Similar	Less	Similar	Similar
Traffic	Significant and unavoidable	Greater	Similar	Less	Similar
Visual Effects and Neighborhood Character	Significant and unavoidable	Similar	Similar	Similar	Similar
Water Quality	Significant and unavoidable	Similar	Less	Similar	Similar

As the table shows, the Enhanced Sustainability alternative would be environmentally superior to the Draft General Plan.

FF-19

c. Explain the methodology that defined the degrees of impact, For example:

Each negative component of impact was listed by committee and was given points. An average number was calculated and anything above the average was to be significant and unavoidable; equal was defined as similar; less than average was defined as less.

9. Refer to figures 3.15-5 and 7 in the PEIR

FF-20 a. Please refer to the Grantville Redevelopment Plan EIR and explain how the traffic level of service (LOS) can be A, B or C when significant portions of the Mission Gorge Rd. are at a (LOS) 'F' currently according to the Grantville Redevelopment Plan EIR?

FF-21 b. Please explain from your analysis of the SANDAG maps figures 3.15-4, 5 why the Mission Gorge Road was not included in the traffic (LOS) for 2003 (fig. 3.15-7

FF-22 c. Refer to the Grantville Redevelopment Plan EIR and explain from your analysis of the SANDAG maps figures 3.15-4, 5 how portions of the Mission Gorge Road will not be impacted by 175,000 trips per day (way into the upward infinite range of a LOS 'F') as projected by the Grantville Redevelopment Plan EIR will not be a significant impact.

FF-23 d. Was the Grantville EIR used in the initial analysis? If not please explain why?

FF-24 e. Figures 3.15-4 and 3.15-7 are inconsistent because arterials are not included in 3.15-7. Please correct 3.15-7 and if not please explain why?

10. Refer to:

http://www.opr.ca.gov/planning/PDFs/General_Plan_Guidelines_2003.pdf Page 8, and explain the following: Since "must" or "shall" are only used in the Housing element does that mean

that there are no 'statutory or other legal requirements' in the other elements?

FF-20 – FF-23 The roadway and land use assumptions in the General Plan EIR are based on existing adopted Community Plans and current amendments. The General Plan EIR analyzed the traffic from a citywide perspective and is not intended to look at the traffic from a community plan area or project level. The Level of Service is indicated by roadway miles and vehicle miles traveled citywide.

FF-24 The Level of Service for arterial roadway segments will be analyzed at the Community Plan level and project level.

FF-25 The Housing Element is subject to a number of very specific regulations in state law such as a requirement that zoning and land use be in place to allow a certain number of future housing units. The other elements of the General Plan do not have such specific requirements. It should be noted that the Housing Element does not specify where housing units should be located. Therefore, requirements for housing can be balanced with other competing needs with housing and other uses being located where they are appropriate.

According to the State of California Guidelines, General Plan Guidelines, "all elements of the General Plan have equal legal status." (12, 2003) The Housing Element does not have more weight than other elements of the General Plan. However, since it must conform to State Housing Element law, which mandates specific quantifiable requirements and an update to the element every five or six years, it differs in emphasis from the other elements which are not required to meet specific quantifiable goals.

11. The Housing Element is a more formally legal than the remaining elements of the general plan because of the use of .e.g., 'shalls', It is a state requirement that all elements 'shall' have the same weight. (See insert 1 below)

(Begin insert1)

Source: <http://www.archives.gov/federal-register/write/legal-docs/clear-writing.html>

shall	imposes an obligation to act, but may be confused with prediction of future action
will	predicts future action
must	imposes obligation, indicates a necessity to act
should	infers obligation, but not absolute necessity
may	indicates discretion to act
may not	indicates a prohibition

(end insert 1)

(Begin insert 2)

Also from :

<http://www.sandiego.gov/planning/genplan/Index.shtml>

Housing Element - The Housing Element differs from the other elements in the General Plan in several respects. The state requirements for the Housing Elements are more specific than for other General Plan elements and require that quantifiable goals be established and that specific programs be identified to meet these goals. In addition the Housing Element must be updated every five to seven years. Therefore, the format and timeline of the Housing Element differs significantly from that of the other elements.

(end insert 2)

a. The housing element EIR:

FF-26

Environmental analysis for the Housing Element was through an Addendum to EIR No. 40-1027 (the City of Villages Growth Strategy Strategic Framework Element EIR). Link = <http://www.sandiego.gov/planning/community/pdf/cpc/agendas/attachments/heelraddendum.pdf>
Will you please attach the full text of this doc to the DEIR as a reference?

FF-27

b. Since the Strategic Framework Element has now been incorporated into the Draft General Plan and has certain portions omitted or rewritten is there a need to produce another EIR for the Housing Element? Please explain?

FF-28

c. How can the housing element be weighted the same when the housing element is written using legally binding terms and the other elements have seemingly unquantifiable terms such as 'support', and 'encourage'?

- FF-26 The Housing Element environmental document is not attached to the PEIR because the other elements of the General Plan are the project under consideration. Please note that the Housing Element is on a five-year cycle while the General Plan is on a 20-year cycle. As stated in the PEIR, the Housing Element was subject to public review and approved by the City Council on December 5, 2006. A copy of the Housing Element may be reviewed at the offices of CPCI Department, 202 'C' Street, 4th floor.
- FF-27 An environmental document was prepared for the Housing Element which incorporated the City of Villages Strategy. The draft General Plan incorporates and expands upon the Strategic Framework plan policies but does not change the intent. There is no need to prepare a new environmental document for the adopted Housing Element because it is not part of the proposed project and will not be changed by the proposed project. Note that additional environmental analysis will be required for the update of the Housing Element required within the next three years.
- FF-28 The fact that the Housing Element differs from the other elements in being more specific and quantifiable does not indicate that it has more weight or importance than the other elements or that goals in the Housing Element are more important than or should take precedence over those in other elements.

COMMENTS

RESPONSES

12. Table 1 below lists action verbs used primarily in the land use and recreation elements. The citizens of San Diego must depend on the results of EIRs to understand what the City really has in mind for their communities. When such non-precise and questionable verbs are used to define policies, the citizens will be forced to rely upon the interpretations of city staff during the community plan update process which could initiate heated and prolonged discussion.

FF-29

a. Referring to question 11 - insert 1, please provide a chart using insert 1 as an example for how the DEIR authors and analysts interpreted the policies of the General Plan with the legal meaning of each verb as they perceived was the intension of the meaning in the general plan?

For example:

require	Must be complied with since there is an existing ordinance, program or plan.
---------	--

b. Similar to insert 1 above prioritize the verbs by the strength of the verbs by listing from top to bottom?

c. If there is a more inclusive list of these verbs covering all elements of the general plan then please provide?

Table 1 action verbs

accept	
acknowledge	
affirm	
analyze	
assist	
assure	
balance	
build upon	
comply	
consult	
coordinate	

FF-29 All policies in the General Plan carry equal weight. Any questions related to the definition of a word used in a policy should consult, first, the General Plan Glossary and, second, the English dictionary.

COMMENTS

RESPONSES

correct develop disperse eliminate expand follow-up group improve incorporate initiate integrate obtain plan prioritize revise revitalize support purchase pursue recommend refine treat update verify address adopt apply assess consider create design designate implement include maintain prepare recognize review subject submit use	
---	--

COMMENTS

RESPONSES

utilize work encourage establish increase strive determine draft identify require provide evaluate ensure encourage strive support pursue maximize emphasize limit participate explore review continue to participate coordinate involve work avoid	
---	--

13. programs, plans or ordinances

- FF-30 a. Was there analysis of any existing programs, plans or ordinances that were referenced from any or each of the General Plan policies? If not please explain why?
- FF-31 b. Could impacts of the General Plan policies be more precisely determined if related existing programs, plans or ordinances were included or referenced by the general plan.

- FF-30 Policies formulated during the General Plan update process were evaluated, referenced and analyzed against existing regulations, ordinances, and other policy documents.
- FF-31 Reference to these regulations, ordinances, plans and programs are provided in the various General Plan introduction and discussion sections and in the PEIR Section 2.0 Project Description and the Existing Condition subsections under each Environmental Analysis section.

COMMENTS

- FF-32** 14. As part of the analysis were their requests for any policy applicable, programs, plans or ordinances to help provide a more complete and precise PEIR?
a. If not then why were these not requested?
b. If they were requested and not provided then please explain the reason for not complying with the requests?
- FF-33** 15. How can the general plan be consistent throughout if the housing element defines programs but no other element does?
- FF-34** 16. Pg 13 of the general plan states:
'State law requires internal consistency, meaning that policies within the components of the General Plan cannot conflict with one another, and that no one element may take precedence over another.'

How can the housing element not take precedence over the other elements since the other elements:
a. are not required to be approved by the state?
2. may be legally interpreted in multiple ways the city planning department, development services, developers, the communities, the county or any individual sect sees best to perceive them.?
- FF-35** 17. How did the PEIR analysts determine the internal consistency of the general plan.
- FF-36** 18. Explain how the general plan with the exception of the housing element is not a wish list by stating the law(s) that make it enforceable?
- FF-37** 19. Explain how the housing element is not a wish list by stating the law(s) that makes it enforceable?
- FF-38** 20. DEIR page 2-49 states:
'The Housing Element is intended to assist with the provision of adequate housing to serve San Diegans of every economic level and demographic group. The state directs that a Housing Element shall be updated at five-year intervals and shall consist of standards and plans for the improvement of housing

RESPONSES

- FF-32** References to applicable regulations, ordinances, plans and programs are provided in the PEIR Section 2.0 Project Description and the Existing Condition subsections under each Environmental Analysis section.
- FF-33** For the purposes of the PEIR, an inconsistency with an adopted plan is not by itself a significant impact. The inconsistency must relate to a physical environmental impact to be considered significant under CEQA. Although the General Plan does not propose any direct or indirect physical changes, it is assumed that future development proposed following the adoption of the General Plan may result in conflicts between plans and this is the reason the issue of consistency is "significant and unavoidable." The fact that the Housing Element differs from the other elements in being more specific and quantifiable does not indicate that there is an inconsistency between elements.
- FF-34** See response to comments FF-25 and FF-29. (Same as response 11 and 11c.) According to the State of California Guidelines, General Plan Guidelines, "all elements of the general plan have equal legal status." (12, 2003) The Housing Element does not have more weight than other elements of the General Plan. The fact that the Housing Element differs from the other elements in being more specific and quantifiable does not indicate that it has more weight or importance than the other elements or that goals in the Housing Element are more important than or should take precedence over those in other elements.
- FF-35** Policies formulated during the General Plan update process were evaluated, referenced and analyzed by staff to determine internal consistency within the General Plan based on the five criteria detailed in the State of California Guidelines, General Plan Guidelines.
- FF-36** There are seven state mandatory elements/topics. Appendix A, SF-1, in the General Plan provides a table showing where each of the mandatory topics are discussed in the General Plan. Refer to the State of California Guidelines, General Plan Guidelines for information on state statues and laws requiring long term general plans.

COMMENTS

RESPONSES

- FF-37 The Housing Element is a mandatory element of the General Plan. See response to comment FF-36.
- FF-38 The process for updating and amending the General Plan requires public input and City Council action. The process for updating and amending the General Plan is located in the Land Use and Community Planning Element Section D. Plan Amendment Process. The process for amending land use plans is currently located in the Municipal Code, §122.0101 and the General Plan proposes to relocate the process for amending the General Plan and associated community plans to the General Plan.

COMMENTS

RESPONSES

and for the provision of adequate sites for housing,' and shall "make adequate provision for the housing needs of all segments of the community."

The Housing Element update was distinct from the rest of the General Plan due to the need for frequent Housing Element updates to facilitate compliance with the state reporting requirements.'

a. Does the General plan including the housing element always get updated with review through outreach to the public before it goes to the Planning Commission?

21. PEIR page 2-49 states:

'The Housing Element is consistent with the other elements of the Draft General Plan and incorporates the City of Villages strategy as one of its key components of the City's housing strategy.'

FF-39

a, This doesn't appear to be true because of the legal weight of the housing element due to the use of shalls, shoulds, etc, and the remaining elements of the general plan that use action verbs such as 'support' and 'encourage'. In a court of law would the housing element have a stronger legal weight than the other elements? Please explain?

b. the general plan page sf-28 states:

'It (the housing element) must remain consistent with the other elements of the General Plan and incorporate the City of Villages strategy as one of its key components of the City's housing strategy.' (notice the word 'must'.)

FF-40

1. Will you identify the city or state law that makes it a must that the housing element incorporates the city of villages strategy?

FF-41

2. If there is no state or city law then explain why the housing element must incorporate the city of villages strategy?

FF-39 See response to comments FF-25, FF-29, and FF-34. According to the State of California Guidelines, General Plan Guidelines, "all elements of the General Plan have equal legal status." (12, 2003) The Housing Element does not have more weight than other elements of the General Plan. The fact that the Housing Element differs from the other elements in being more specific and quantifiable does not indicate that it has more weight or importance than the other elements or that goals in the Housing Element are more important than or should take precedence over those in other elements.

FF-40 According to the State of California Guidelines, General Plan Guidelines, "all elements of the General Plan, whether mandatory or optional, must be consistent with one another. The court decision in *Concerned Citizens of Calaveras County v. Board of Supervisors (1985) 166 Cal.App.3d 90* illustrates this point." (13, 2003) The Housing Element incorporates the City of Villages strategy that was adopted as part of the Strategic Framework Element in 2002.

FF-41 See response to comment FF-40.

COMMENTS

RESPONSES

3. Does the sentence actually mean:

FF-42

The housing element must remain consistent with the other elements of the General Plan and it incorporates the City of Villages strategy as one of its key components of the City's housing strategy? Please explain?

FF-43

c. Since the city of villages is identified in the strategic framework element and the strategic framework has been modified and incorporated into the general plan then should not the city of villages growth strategy be reconsidered as independent? Please explain?

22. Page 2-52 General Plan Implementation states: Community plans will play a major role in the implementation of the General Plan. They provide the site-specific recommendations that translate policies into actions.

Also

Page 2-29 states:

While the community plan addresses specific community needs, its policies and recommendations must remain in harmony with other community plans, the overall General Plan, and citywide policies.

FF-44

a. Will the community plan policies also be translated into recommendations?

FF-45

b. Will an environmental review be required as part of each of the community plan updates that will supplement the general plan PEIR or make it more precise ? Please explain?

23. Page lu-21 Roles and Relationships - General Plan and Community Plans states:

The City of San Diego has more than fifty planning areas, as illustrated on Figure LU-3, Planning Areas Map. The community planning program has a long and diverse history, with the

FF-42 The Strategic Framework Element and City of Villages strategy was adopted in 2002 and provided the policy direction for the General Plan update.

FF-43 The City of Villages strategy is part of the General Plan update and will be considered with the entire General Plan update effort.

FF-44 As community plans are updated, the community plans will provide site specific recommendations and policies.

FF-45 As community plans are updated, they will require separate environmental review. Page 2-29 of the PEIR describes the community plan update and environmental review process.

COMMENTS

RESPONSES

earliest community plans being adopted in the 1960s. Each document is a unique reflection of the issues and trends facing the community and corresponding strategies to implement community goals.'

And

'Community plans are the vehicle for implementing state law pertaining to provision of housing opportunities.'

And

'Implementation of community-based goals may cause a shift in densities within or between community planning areas, but together they must maintain or increase overall density and housing capacity.'

Page 2-29 states:

'As community plans designate land use and density, they must preserve or increase the planned density of residential land uses to ensure that the City is able to meet its share of the region's housing needs. Implementation of community based goals may cause a shift in densities within or between community planning areas but together they must maintain or increase overall housing capacity.'

FF-46 a. What law requires that implementation of community-based goals that may cause a shift in densities within or between community planning areas together must increase overall density and housing capacity?

FF-47 b. refer to table 7.4-1. If there is no law, then please explain how the communities would be impacted if the requirement for overall density increase is not mandated?

24. Page 2-29 and page LU-21 states:

'While the community plan addresses specific community needs, its policies and recommendations must remain in harmony with other community plans, the overall General Plan, and citywide policies.'

FF-46 See response to comment FF-25. The Housing Element is subject to a number of very specific regulations in state law such as a requirement that zoning and land use be in place to allow a certain number of future housing units. The other elements of the General Plan do not have such specific requirements.

FF-47 It should be noted that the Housing Element does not specify where housing units should be located. Therefore, requirements for housing can be balanced with other competing needs with housing and other uses being located where they are appropriate through the community plan update process. Community plan updates will require additional environmental review.

COMMENTS

RESPONSES

The State General Plan Guidelines state the meaning :

'Consistency; Consistent with:

Free from significant variation or contradiction. The various diagrams, text goals, policies, and programs in the general plan must be consistent with each other, not contradictory or preferential. The term "consistent with" is used interchangeably with "conformity with." The courts have held that the phrase "consistent with" means "agreement with; harmonious with." The term "conformity" means in harmony therewith or agreeable to (Sec 58Ops.Cal.Atty.Gen. 21, 25 (1975)). California law also requires that a general plan be internally consistent and also requires consistency between a general plan and implementation measures such as the zoning ordinance. As a general rule, an action program or project is consistent with the general plan if, considering all its aspects, it will further the objectives and policies of the general plan and not obstruct their attainment.'

The above State guideline does not state that community plans must be in harmony with each other. What is said is that, goals, policies, and programs in the general plan must be consistent with each other.

- FF-48** a. Did the DEIR team find the same interpretation of the State guidelines as interpreted by the general plan authors and stated in the general plan? Please explain?
- FF-49** b. The statement that community plan its policies and recommendations must remain in harmony with other community plans is unreasonable when all communities are unique and conformity because of this uniqueness. Please explain how unique communities can conform to each other?
- FF-50** c. Is there a state law or current city law that requires this? Please explain?

- FF-48 Policies formulated during the General Plan update process were evaluated, referenced and analyzed by staff to determine internal consistency within the General Plan based on the five criteria detailed in the State of California General Plan Guidelines. Consistency between General Plan policies and adopted land use plans are discussed in the PEIR Environmental Analysis Section 3.8.3.
- FF-49 The Development Services Department's Significance Determination Thresholds required that the General Plan be analyzed for potential "conflicts with the environmental goals of adopted community plans, land use designations or any other applicable land use plans, policies or regulations of state or federal agencies with jurisdiction over the City." As far as community plans are concerned, policies and recommendations are site specific within the individual boundaries of the community planning area and conflicts between community plans is unlikely. Any adjacency issues will need to be analyzed at the time that community plans are updated. The General Plan provides the overall policy guidance for community plans; and community plans will provide the land use designations, density, intensity and other policy recommendations for each community.
- FF-50 The Development Services Department's Significance Thresholds required that the General Plan be analyzed for potential "conflicts with the environmental goals of adopted community plans, land use designations or any other applicable land use plans, policies or regulations of state or federal agencies with jurisdiction over the City."

COMMENTS

FF-51 d. Will the policies in the community plans reflect the same strength of commitment as the policies in the general plan? Please explain?

FF-52 e. Please define the word 'harmony' in legal terms within the context of the draft general plan as interpreted by the PEIR reviewers.

25. Table me-26 (shown below) the traffic calming toolbox is included in the general plan (as *Is a pedestrian improvement tool box and a parking strategies tool box - not shown but both are similar to the traffic calming toolbox*) and the detail these 'toolboxes' show are inconsistent with the content of any other portions of the general plan. The traffic calming toolbox for example is an elaborated copy of portions the city's street design manual (see the table of contents excerpt from the street design manual below).

a. These toolboxes have been used as selling points for the general plan and they come closest to 'implementation or implementation plans' than any other portions of the general plan. Did the inclusion of these 'toolboxes' have any affect on the 'analysis' for traffic impact when comparing the proposed project to the no project alternative because the 1979 General Plan did not include these tool boxes (see table 7.4-1 of the draft General Plan). Please explain?

FF-53

FF-54 b. Why is there not a consistent level of 'tool box' coverage for

- 1.) street lighting and
- 2.) traffic level of service

in the general plan as there is for traffic calming?

FF-55 c. Would it have made a difference in levels of impact if toolboxes for these issues were included? Please explain?

FF-56 d. Is there a rewrite of the traffic design manual in the plans to conform to the general plan?

RESPONSES

FF-51 The General Plan provides the overall policy guidance for community plans and community plans will provide the land use designations, density, intensity and other policy recommendations on a site specific level. The community plans comprise part of the Land Use and Community Planning Element and are considered a part of the General Plan.

FF-52 The word "harmony" on Page 2-30 of the EIR is synonymous with the word "consistent" as used in the State of California, General Plan Guidelines.

FF-53 The "toolboxes" included in the Mobility Element are designed to allow for flexible implementation of Mobility Element policies related to pedestrian improvements, traffic calming, and parking management. Policies are provided to guide use of the toolboxes. The level of detail of the policy statements are similar to other policy statements throughout the Draft General Plan, and the level of detail of the toolboxes themselves are similar to that found in other elements on a variety of topics such as that shown on Table PF-4, Table RE-3, and Table NE-3. Additional language has been added to the introduction of the Mobility Element to clarify the intended use of toolboxes which are used to clarify the intent of General Plan policies. The use of the toolboxes did not influence the level of analysis in the EIR for the project and the no project alternative.

FF-54 The role of the Mobility Element is to provide policies to achieve a multi-modal transportation network that supports the City's land use plan. The Street Design Manual is intended to help implement the General Plan and provides guidance for the design of the public right-of-way. The two documents are complementary and do not conflict with each other. The Mobility Element toolboxes provide an overview of some of the specific transportation design and management tools that are available in order to more effectively communicate General Plan policies and help ensure that future implementation will take place.

FF-55 The use of the toolboxes did not influence the level of analysis in the EIR.

FF-56 See response to comment FF-54.

COMMENTS

RESPONSES

FF-57

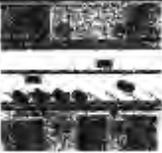
e. Does not it make it more difficult to evaluate a general plan (and further complicate other city efforts) when there is duplicate documentation that must be considered (i.e., the toolboxes and the street design manual)?

FF-57 The toolboxes were provided to clarify the intent of the General Plan policies.



Mobility Element

TABLE ME-2 Traffic Calming Toolbox

Speed Control Tools		
Angled Parking	Angled Parking is generally used to increase the number of on-street parking spaces. However, a positive by-product can be a reduction in vehicle speeds due to narrowing of the travelway and driver anticipation of vehicles backing out of parking spaces.	
Angled Slow Point	Angled Slow Points are created by installing triangular curb extensions on opposite sides of the road. This creates a narrow two-way lane in the centerline that defines opposing vehicles' points of view. Drivers must slow down to maneuver through the curve to negotiate the curve.	
Chicanes	Chicanes are created by installing a series of two or more curb extensions, alternating from one side of the roadway to the other. This creates an S-shaped path of travel for vehicles. To reduce speeds, chicanes rely on a curved path and potential conflicts between opposing traffic.	
Chokers	Chokers are created by installing curb extensions at opposing locations on a roadway. This narrows the travelway, but maintains two-way traffic. This device works best at mid-block locations that have volumes sufficient enough that opposing traffic would be approaching or passing through the choker at the same time.	

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Below are excerpts from the State of California General Plan Guidelines are for reader reference only.
 (link
http://www.opr.ca.gov/planning/PDFs/General_Plan_Guidelines_2003.pdf)

Page 8:

The General Plan Guidelines is advisory, not mandatory. Nevertheless, it is the state's only official document explaining California's legal requirements for general plans. Planners, decision-making bodies, and the public depend upon the General Plan Guidelines for help when preparing local general plans. The courts have periodically referred to the General Plan Guidelines for assistance in determining compliance with planning law. For this reason, the General Plan Guidelines closely adheres to statute and case law. It also relies upon commonly accepted principles of contemporary planning practice. When the words "shall" or "must" are used, they represent a statutory or other legal requirement. "May" and "should" are used when there is no such requirement.

Page 12: INTERNAL CONSISTENCY

The concept of internal consistency holds that no policy conflicts can exist either textual or diagrammatic, between the components of an otherwise complete and adequate general plan.

Different policies must be balanced and reconciled within the plan. The internal consistency requirement has five dimensions, described below.

"In construing the provisions of this article, the Legislature intends that the general plan and elements and parts thereof comprise an integrated, internally consistent and compatible statement of policies for the adopting agency." (§65300.5)

page 12: Equal Status Among Elements

All elements of the general plan have equal legal status. For example, the land use element policies are not superior to the policies of the open-space element. A case in point: in *Sierra Club v. Board of Supervisors of Kern County* (1981) 126 Cal.App.3d 698, two of Kern County's general plan elements, land use and open space, designated conflicting land uses for the same property. A provision in the general plan text reconciled this and other map inconsistencies by stating that "if in any instance there is a conflict between the land use element and the open-space element, the land use element controls." The court of appeal struck down this clause because it violated the internal consistency requirement under §65300.5. No element is legally subordinate to another; the general plan must resolve potential conflicts among the elements through clear language and policy consistency.

Page 13

Consistency Between Elements

All elements of a general plan, whether mandatory or optional, must be consistent with one another. The court decision in *Concerned Citizens of Calaveras County v. Board of Supervisors* (1985) 166 Cal.App.3d 90 illustrates this point. In that case, the county land use element contained proposals expected to result in increased population. The circulation element however, failed to provide feasible remedies for the predicted traffic congestion that would follow. The county simply stated that it would lobby for funds to solve the future traffic problems. The court held that this vague response was insufficient to reconcile the conflicts. Also, housing element law requires local agencies to adopt housing element programs that achieve the goals and implement the policies of the housing element. Such programs must identify the means by which consistency will be achieved with other general plan elements (§65583(c)), especially with regard to small areas. The court noted that the area plan's more specific "urban residential" designation was pertinent and that there was no inconsistency between the countywide general plan and the area plan (*Las Virgenes Homeowners Federation, Inc. v. County of Los Angeles* (1986) 177 Cal.App.3d 300). However, the court also noted that in this particular case the geographic area of alleged inconsistency was quite small.

Page 13:

Consistency Within Elements

Each element's data, analyses, goals, policies, and implementation programs must be consistent with and complement one another. Established goals, data, and analysis form the foundation for any ensuing policies. For example, if one portion of a circulation element indicates that county roads are sufficient to accommodate the projected level of traffic while another section of the same element describes a worsening traffic situation aggravated by continued subdivision activity, the

element is not internally consistent (Concerned Citizens of Calaveras County v. Board of Supervisors (1985)166 Cal.App.3d 90).
Law, 1998 edition, p. 18)

Without consistency in all five of these areas, the general plan cannot effectively serve as a clear guide to future development. Decision-makers will face conflicting directives; citizens will be confused about the policies and standards the community has selected; findings of consistency of subordinate land use decisions such as rezonings and subdivisions will be difficult to make; and land owners, business, and industry will be unable to rely on the general plan's stated priorities and standards for their own individual decision-making. Beyond this, inconsistencies in the general plan can expose the jurisdiction to expensive and lengthy litigation.

COMMENTS

RESPONSES

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Subject: PEIRfor the Draft General Plan; Project No. 104495, SCH No. 2006091032

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Tierrasanta

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- GG-1** 1. Page 2-6, bottom para: the fourth sentence should be reworded to reflect the fact that curtailing local government's ability to generate new revenue sources was not something stumbled into; it was the deliberate act of the voting public in an effort to limit a local government's ability to raise taxes and instead to direct said governments to control spending.
- GG-2** 2. Page 2-31 thru 2-33: there is no mention of street maintenance as a priority-service goal of the GP with levels of service that are measurable.
- GG-3** 3. Page 2-40: table 2.4-3 and the entire discussion on public facilities makes no mention of streets/roads as a public facility provided by the city.
- GG-4** 4. Page 3.15-1: Roadways are reviewed only insofar as the types of roads are described, but there is no follow-on discussion of road maintenance as a priority public service.
- GG-5** 5. Page 3.15-5: excessive detail is provided on levels of service (LOS) in

- GG-1** Page 2-6 of the PEIR and Page PF-4 of the Public Facilities, Services and Safety Element have been edited to include more neutral language regarding local government financing.
- GG-2** A new goal will be added to this section as well as to the Mobility Element Section C.
- GG-3** "Streets" will be added as a topic area with a reference to the Mobility Element.
- GG-4** Roadway maintenance is discussed in PEIR Section 2.2 (Page 2.21 of DEIR).
- GG-5** Roadway maintenance is discussed in PEIR Section 2.2 (Page 2.21 of DEIR).

COMMENTS

RESPONSES

terms of moving cars on roads and through intersections, and later on parking demand management, but there is no discussion of road maintenance as the critical public service provided by the city that keeps the whole system operating.

GG-6 6. Page 3.16-22: must reflect the new policy(ies) on street maintenance that were recommended by CPC and agreed to by the CPOI staff.

CC

"Eric Germain" <agermain@pacbell.net>

GG-6 Mobility Element edits related to maintenance have been included on this page of the PEIR.

COMMENTS

RESPONSES

From: "Carolyn R. Thomas" <crt@5cats.org>
To: <mimirasoul@sandiego.gov>
Date: 6/7/2007 2:32:37 PM
Subject: conservation element and EIR

Ms. Mirrasoul –

HH-1

I understand that you're accepting comments about the conservation element and EIR. I think it's a great time for San Diego to take a leadership role in protecting our environment against climate change. My only problem with the plan that will be voted on is its lack of specificity. It's much more difficult to enforce and to measure the results of vague recommendations, as well-meant as they might be.

On pages 199-200 (section 5.0) of the EIR, there are some specific items that should be done. You might also refer to the attached summary of Seattle's plan. They give dollar amounts and numbers for many of their actions.

I'd like to see a commitment to reduce greenhouse gas emissions by 90% by 2030. "Heat: How to Stop the Planet From Burning" by George Monbiot outlines a plan for the UK to do so. San Diego is in a much better position to use solar power than the UK. We need a clearly described and measurable plan to improve public transportation and bicycle paths, to improve our building standards, to reform our retail and construction industries, and to spread renewable energy collection throughout San Diego. In reducing sprawl and traffic, we can protect native habitats for San Diego's wild plants and creatures.

I know that your office has done a great deal of research on reducing greenhouse gas emissions in San Diego. I'm urging you to put an ambitious, detailed plan into action at once. There's no time for delay.

Thank you for your consideration.

Sincerely,
Carolyn R. Thomas

HH-1 See response to comments B-1 and B-3 – B-13.

COMMENTS

RESPONSES

From: "Randy Berkman" <rjb223@hotmail.com>
To: <mmirasoul@sandiego.gov>
Date: 6/11/2007 6:48:46 AM
Subject: Project #104495: General plan EIR comments

Attention: Marilyn Mirasoul (mmirasoul@sandiego.gov)
Project No. 104495
General Plan Draft EIR comments of Randy Berkman

II-1

Is there an option without significant effects? If not, why not?

Is there an option that does not induce growth? If not, why not? An EIR without an option that does not induce growth, is deficient since it does not contain a range of reasonable alternatives as CEQA requires.

Is there an option which does not have significant air quality impacts? Since San Diego is a non-attainment region for air pollution, it is highly irresponsible to approve anything which makes this worse. What effects on health would this have (lung disease, asthma, lung cancer)? How many tons of pollutants/day would the proposed project have compared to No Build, other options, and a non-growth inducing option? What pollutants are expected to have significant increases?

Is there an option which does not have significant traffic impacts? If not, why not?

Is there an option which does not have significant water quality impacts? If not, why not? What water bodies are expected to be impacted and with what pollutants?

Is there an option which does not have significant biological impacts? If not, why not? How many acres of biological resources are expected to be impacted by the various options?

Is there an option which does not have significant hydrology impacts? If not, why not? What hydrology impacts are expected?

Is there an option which does not have significant agricultural impacts? If not, why not?

Is there an option which does not have significant public utilities impacts? If not, why not?

Is there an option which does not have significant public safety impacts? If not, why not? What public safety impacts are expected?

Is there an option which does not have significant neighborhood character impacts? If not, why not? Does this include conversion of single family areas to condos?

II-2

Does the General Plan update include increased densities? If so, please list present versus proposed densities and in what parts of town would densities be increased?

II-3

Is the Sandag population forecast included in the EIR based on higher densities than now exist? In 2002, the City of Villages was rationalized based upon erroneous higher population forecasts of Sandag—which presumed the higher densities of the village! In other words, higher population was forecast based on increased densities of the City of Villages than compared to existing community plan densities. When the

II-1

At the program level for this draft General Plan PEIR, impacts to all environmental issue areas were considered significant and not mitigated because the implementation of future projects may lead to impacts that may or may not be mitigable. Staff can not predict at the General Plan level or describe such projects because they are unknown at this time.

The CEQA does not require the inclusion of alternatives to avoid or reduce all of the General Plan potentially significant impacts. In fact, it is unlikely that such an alternative could be developed, as the PEIR identifies the potential for significant and unavoidable impacts in all issue areas. CEQA requires a reasonable range of project alternatives. The alternatives presented in this document are a result of collaboration between DSD and City Planning & Community Investment Department staff and discussion with other environmental professionals with experience in preparing regional level environmental documents.

II-2

The draft General Plan does not propose increased densities over and above what was proposed by the already adopted 1979 General Plan, subsequent updates to the 1979 General Plan (including community plans), and the Strategic Framework Element/City of Villages Strategy.

II-3

Yes, the SANDAG population forecast is based on a higher population than now exists because a forecast is a projection of future population increase. The forecast was not based on the higher densities of the potential villages but was based on a 24 percent increase in the total number of housing units within the capacity of the existing adopted community plans. The environmental document evaluated “no project” alternative but did not evaluate a “no growth” alternative. Such an alternative is infeasible and highly unlikely. Per CEQA Section 15126.6 (a), environmental impact reports are not required to evaluate infeasible alternatives. Also, per CEQA Section 15132, the findings and statement of overriding considerations are included in the public record but not in the final EIR.

COMMENTS

RESPONSES

circular nature of this was pointed out to Sandag staff, they revised their population forecasts downward! The "need" for the extra 17,000-37,000 condos was eliminated! This (lower population forecast) was reported on the front page of the Union-Tribune. It is extremely misleading to the public and decision makers to base population forecasts on proposed higher densities without disclosing this to the public and without disclosing that lower proposed densities results in lower population forecasts. "If you forecast it, they will build it and they will come"! Again, a non growth inducing option needs to be included in this EIR.

Is a Statement of Overriding Considerations included in the Draft EIR? If not, it is defective.

Randy Barkman

Hotmail to go? Get your Hotmail, news, sports and much more! Check out the New MSN Mobile!
<http://mobile.msn.com>

COMMENTS

RESPONSES

Mrs. Rebecca Robinson-Wood
12625 Caminito Radcliffe
San Diego, California 92130
June 11, 2007

Mr. Robert J. Manis
Deputy Director, Development Services Department
City of San Diego
1222 First Avenue
San Diego, California 92101

Mr. Michael Aguilera, City Attorney
City of San Diego
1200 3rd Avenue, Suite 1620
San Diego, California 92101

Mr. William R. Anderson
Director, Planning Department
City of San Diego
202 C Street, 5th Floor
San Diego, California 92101

RE: JO: 6090, Project No. 104495, SCH No. 2006091032
Request for removal from 2006 Draft PEIR Storm Water Map 3.7-1
Request for removal from 2006 Draft Surface & Receiving Water Systems Map 3.7-2
Request for removal from 2006 Conservation Element Map CE-2

APN 346-802-13, Multi-Family Zoned Site RM-1-1

Attn: Ms. Marilyn Mirasoul, Environmental Planner

Dear Mr. Manis, Mr. Aguilera, and Mr. Anderson:

I request that the public be made aware of the following with respect to the PEIR and the 2006 Draft General Plan and that the following be disclosed clearly in the PEIR and 2006 General Plan documents:

JJ-1

1. The existing 1979 General Plan effectively took, by legislation, the rights of property owners to develop 75 percent of the land area of privately owned properties in the flood plain, areas with 100 foot slope, and areas identified as environmentally sensitive.

JJ-2

2. Rather than reading like an Environmental Impact Report, the draft PEIR reads more like a city policy manual or municipal code including identifying specific and non-specific penalties to be charged to private property owners if certain site characteristics exist. I wonder if the city staff can write their own Environmental Impact Report. If so, I would like to write my own Environmental Impact Report with the development of my property.

JJ-3

3.a. PEIR Page 2-12 & 2-13 Table 2.2-2 Community Planning Area Population Based Park Summary (March 2007) reports a 97.9 percent deficiency in population based park land, showing a total park land of 1,790.27 acres. However, 2,857.9 acres gross are identified as the land area in population based park lands in Table 2.2-1. The Table 2.2-2 under-represented the total land available to use as population based park land by 59.6 percent or 1,067.63 acres. See Paragraph 3.c. below. For the city to say that only 1,790.27 acres are in park use in the city may be considered a misrepresentation.

Page 1 of 3

JJ-1 This comment does not address the adequacy of the PEIR.

JJ-2 This comment does not address the adequacy of the PEIR.

JJ-3 The referenced tables have been updated for consistency.

COMMENTS

RESPONSES

Page 2 of 3

Letter to Mr. Robert Manis, Mr. Michael Aguirre, and Mr. William Anderson, City of San Diego
Letter from: Mrs. Rebecca Robinson-Wood
Dated June 11, 2007

RE: JD: 6090, Project No. 104495, SCH No. 2006091032.
APN: 346-802-13-00

Request for removal from 2006 Draft PEIR Storm Water Map 3.7-1
Request for removal from 2006 Draft Surface & Receiving Water Systems Map 3.7-2
Request for removal from 2006 Conservation Element Map CE-2

JJ-4

3.b. Minimally, 25 percent of City owned lands that are in flood plains and sensitive areas may be considered for development as population based parks supplement any and all deficiencies in the city population based park system. This would help developers and the residents of the city to keep the price of housing down, by decreasing the cost to developers.

JJ-5

3.c. PEIR Page 3-10 Table 2.2-1 Existing Park and Open Space Acres within the City of San Diego. This is very misleading and may misrepresent the totals. This is evidenced by the fact that the central column says the Total Gross Park and Open Space land is 38,930.3 acres. Dedicated parks at 12,067.7 acres, joint use school sites at 267.4 acres and Footnote 3 at 6,043.96 acres, for a total of 18,379.06 acres or 14.25 acres per 1,000 population.

JJ-6

Alternatively, PEIR Page 3.8-1 Existing Uses, shows Park, Open Space and Recreation Uses at 80,654 acres, significantly more acres than reported in Page 2.2-2 and Page 2.2-1. This acreage total presumably includes a significant amount of acreage in regional parks owned by other governmental agencies and lands in private ownership, i.e. golf courses, homes, clubhouses, homeowners association lands, plazas, malls, etc.. The format presented in the 1979 Progress Guide and General Plan, Table 17, Recreation Element 163 is more simplified and easier to read.

JJ-7

4. PEIR Page 2-12, Table 2.2-2, Balboa Park and Mission Bay Park are believed to serve the city as a whole.

JJ-8

5. As of January 2006, the City of San Diego had removed minimally 239 City of San Diego owned parcels from the Habitat (Multiple Habitat Planning Area-Multiple Species Planning Area). I would also like to remove my property from these overlays.

6. Due to advancements in construction technology, there is much likelihood that future development may significantly improve the safety, health, and well being of the city as a whole.

JJ-9

7. Property ownership is a significant element of the wealth of a community and is a significant influence on the stability of a community. It is important to insure that, through thoughtful planning and structuring of fees, budgeting, etc., that the community may be sustainable and that future generations may also enjoy private ownership of property. The economic viability of property is important to the stability of the community.

The following are items that I recommend for correction and apply specifically to my referenced property APN: 346-802-13-00
Lot 2 of Map 7174, La Jolla Village Apartments, Unit 2

JJ-10

A. Please see the San Gis Map provided November 2006 showing that my property is not an open space easement and not located in a storm drainage system in the county. No dedications were required with the Subdivision Map and I have an application in to place the property in Multiple Use. I spoke with the San Diego County Water Authority earlier this year and was informed that my property is not part of a major stormwater system.

JJ-4 The proposed solution is not possible for the following reasons:

1. The City periodically reviews open space lands for the potential to provide population-based park improvements; however, the potential for un-mitigated environmental impacts to the flood plains and sensitive areas leaves little to no potential for development of additional population-based park systems.
2. The undeveloped lands that this comment is addressing are not evenly distributed throughout the City and would not meet the goals of the existing and updated General plan, or provide parks where they are needed the most.

JJ-5

Table 2.2-1, Existing Park and Open Space Acres within the City of San Diego, does not provide the total acres for all parks and open space. Only those park acres identified under population-based Parks are used in calculating the total number of acres required per 1,000 thousand as set forth in the General Plan. The Dedicated parks column is a total for both population-based parks and open space lands. Also, Footnote 3 is for other agency and jurisdictions lands that are not population-based recreation in nature and are not used in calculating population-based acreage for the City of San Diego. Column "Total Parks and Open Space (gross acres)" includes population-based parks, resource-based parks, open space lands, and other park lands, which are all individual categories in the same table. A footnote has been added to the table to reflect what is included in this column. The "Total acres per Thousand" shown for each park category is provided for informational purposes and should not be compared to the population-based park standard. Population-Based parks require 2.8 useable acres per 1000 population. See General Plan Policy RE-F.8.

JJ-6

Comment noted. Table 3.8-1, Existing Uses, "displays generalized land use categories distributed across the City," This Table is not intended as an inventory of park land. Table 2.2-1, Existing Park

COMMENTS

RESPONSES

- JJ-7 Comment noted. Both Balboa Park and Mission Bay Park are resource based parks that serve the region as a whole and provide some population-based park amenities to the surrounding communities.
- JJ-8 The Multiple Species Conservation Program (MSCP) is a comprehensive, long-term habitat conservation planning program that covers approximately 900 square miles in southwestern San Diego County pursuant to the federal and California Endangered Species Acts and the California Natural Community Conservation Planning Act. The MSCP is designed to preserve native habitat for multiple species rather than focusing efforts on one species at a time. This is accomplished by identifying areas for development and core biological areas and linkages for conservation to achieve a workable balance between smart growth and species protection. These areas are delineated by the Multi-Habitat Planning Area to achieve a workable balance between smart growth and species protection. The majority of lands within the City of San Diego MHPA are proposed to be conserved by one of the following methods: 1) conservation of existing public lands; 2) land use restrictions and exactions through development regulations for lands within the MHPA; 3) open space previously set aside on private lands for conservation as part of the development process; and 4) public acquisition of private lands.

Regarding the property, referenced as Lot 2 of Map No. 7174, APN: 346-802-13, the subject property was included in the Multi-Habitat Planning Area (MHPA) because it has been designated Open Space since 1959 and has an Open Space Easement which was granted to the City of San Diego in 1972, prior to the creation of the Multiple Species Conservation Program (MSCP) and MHPA. As such, the property was included as land in the MHPA. MHPA lands are shown on Figure CE-2, Multi-Habitat Planning Area, in the Draft General Plan. The City of San Diego does not plan to remove the property from the MHPA or the MHPA overlay, thus Figure CE-2 will remain unchanged. Please note that

COMMENTS

RESPONSES

the Draft General Plan does not establish the MHPA, it merely illustrates the adopted boundaries.

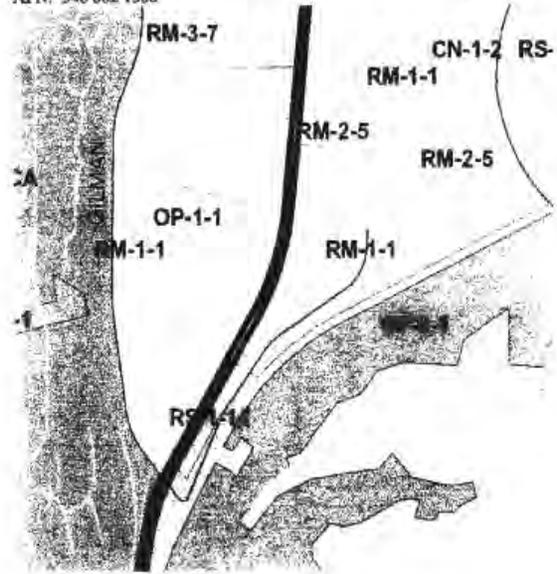
JJ-9 This comment does not address the adequacy of the PEIR.

JJ-10 The subject property has been designated Open Space since creation of the first Master Plan for the University Community planning area which was adopted in 1959, and every comprehensive update to the community plan thereafter. In 1972, as part of the recordation of La Jolla Village Apartments Unit No. 2 Subdivision, six lots were created as depicted in Map No. 7174. An Open Space Easement on Lot 2 of Map No. 7174 was granted to the City of San Diego to ensure the property remains undeveloped open space in perpetuity, consistent with the University Community Plan's designation of the property as Open Space. A copy of the Open Space Easement granted to the City in Map No. 7174 was provided in a letter to you dated October 11, 2006, by Dan Monroe, Senior Planner in City Planning & Community Investment.

COMMENTS

RESPONSES

Project Name: La Jolla Meadows
8300 Gilman Drive or 3101 Via Alicante, San Diego, California 92037
APN: 346 802 1300



COMMENTS

RESPONSES

Page 3 of 3

Letter to Mr. Robert Maris, Mr. Michael Aguirre, and Mr. William Anderson, City of San Diego
Letter from Mrs. Rebecca Robinson-Wood
Dated June 11, 2006

RE: JO: 6090, Project No. 104495, SCH No. 2006091032
APN: 346-802-13-00

Request for removal from 2006 Draft PEIR Storm Water Map 3.7-1
Request for removal from 2006 Draft Surface & Receiving Water Systems Map 3.7-2
Request for removal from 2006 Conservation Element Map CE-2

JJ-11

Please stop draining on my property and remove my property from depiction on the following maps: Draft General Plan CE-4 (depicted as a river), PEIR Figure 3.7-1 (depiction as a storm drain channel and minor river), PEIR Figure 3.7-2 (depiction as a small river). Maps I received from the City of San Diego Records Department in 2006 show the storm drains are supposed to be in the street. I do not want your storm drains directing water beyond the end of your drains. I will find the city fully responsible for any onsite property damage due to unauthorized flow onto the property.

Please see that this property is outside of the 500 year flood plain. I received a map from the City Engineering Flood Department informing me of this a few weeks ago. There is no storm channel in the property that I am aware of and the city informed me that the property is not the location of a flood plain, which would probably include storm waters because the property is shown to be outside of the flood plain on the PEIR 3.5-1 Flood Hazard Areas Map, Draft General Plan, Figure CE-5 Flood Hazard Areas Maps. If the flow of city stormwater discharge has extended beyond the limits of existing perimeter easements and caused any subsidence or unstable soils conditions, I will find the city fully responsible for the planning and full costs required to repair and correct the conditions. I will also find the city responsible for any and all claims of loss due to injury, suffering, or death or financial loss due to injury, suffering, or death of a person or family member or guardian, of anyone who, including people I authorize to access on the property due to the cities mismanagement and unauthorized drainage onto the property. My property is not part of an adopted river system which was included as part of the 1979 Progress Guide and General Plan. I do not want my property to be included in any future river system. I do not want my property to be included in an future storm water system.

JJ-12

B. The property is not a site for conservation in the 1979 Progress Guide and General Plan, Conservation Element Page 184. I do not want the site to be included in the 2006 Conservation Element as a site to preserve. This may be supported by the fact that the recently adopted 2005-2020 Land Use and Housing Element shows that this property residentially zoned and has the potential for use as for housing. I have made a formal request to the city attorney to take the property out of the 1965 Williamson Act lands or similar conservation easement. The property was not required for dedication by the council at the time the subdivision map was adopted. The city was intending to purchase all the open space in the city but did not do so. I purchased this property to use according to the zoning regulations. My contractor sought an access permit and building permit for affordable housing and was discouraged and turned away by city staff.

JJ-13

I have included for your review the zoning map and a San Gis map showing that the property has no open space easement.

Respectfully submitted,

Rebecca Robinson-Wood

cc: Stacey LoMedlao, Director Parks & Recreation Department, Park & Recreation Planning file
Enclosures: Current Zoning Map, San Gis Open Space Map 11/2006

JJ-11 Figure CE-4, San Diego County Watersheds, of the Draft General Plan identifies a river symbol on the referenced property (Lot 2 of Map No. 7174, APN: 346-802-13). The river symbol in this figure is not meant to literally identify a river, but instead is used to identify a broad range of waterways including, but not limited to rivers, streams, creeks, and drainages all of which are part of the San Diego County Watershed system. This is further demonstrated on the State of California Regional Water Quality Control Board, San Diego Region (9), San Diego Hydrologic Basin Planning Area map (Attachments 10a. and b.) and on the USGS La Jolla (CA) Quadrangle Topographic Map (Attachment 11a and b). You have requested the removal of the river symbol from the referenced property as depicted in PEIR Figure 3.7-2, and Figure CE-4 of the Draft General Plan Update. Since this map is a generalized identifier for watersheds, and the referenced property is within a watershed, it would be inconsistent for the City of San Diego to remove the river symbol depicted on the property in PEIR Figure 3.7-2 or Figure CE-4 of the Draft General Plan Update.

JJ-12 This comment does not address the adequacy of the PEIR.

JJ-13 The referenced parcel (Lot 2 of Map No. 7174, APN: 346-802-13) has been designated Open Space in the University Community Plan since 1959, was conserved in perpetuity upon recordation of Map No. 7174, in which the City of San Diego was granted an Open Space Easement to preserve this property as natural, undeveloped open space, and is included in the City of San Diego's MHPA. The City of San Diego does not plan to remove this property from Figures CE-2 and CE-4 of the Draft General Plan. The Draft Conservation Element of the General Plan does not establish new areas to be preserved. The Conservation Element addresses and depicts sites that have already been conserved as open space, as your parcel has been.

The California Land Conservation Act of 1965 (commonly referred to as the Williamson Act) enables local governments to enter into contracts with private landowners for the purpose of restricting specific parcels of land to agricultural or related open

COMMENTS

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space use. According to county of San Diego records, there are no Williamson Act Contracts within the City of San Diego. Therefore, the referenced property is not subject to the contract cancellation procedures of the Williamson Act Program.

COMMENTS

RESPONSES

KK-4

Vehicle miles traveled (VMT) are acknowledged as the primary source of greenhouse gas emissions. Recent actions by the Federal government to increase fuel economy standards have the potential to decrease VMT emissions for 2030 to levels equal to or less than 1990 levels. This is significant as these regulations are critically important to achieving the goals set by the State of California to reduce these emissions. The second largest source of greenhouse gas emissions is energy production. It is recommended a more detailed discussion of the requirements for public utilities to purchase a greater percentage of renewable energy be included in the PEIR.

KK-5

We also recommend the development of a reasonable and achievable list of mitigation measures that provide a "menu of choice" for future projects to rely for environmental clearance. This should include taking advantage of mitigation measures for other impacts, such as transportation demand management and enhanced public/private landscaping that also serve to reduce greenhouse gas emissions.

KK-6

Alternative Analysis: The PEIR should not be used to advocate for an alternative or policy position articulated in the Draft General Plan, therefore, the *Reduced Industrial Lands Protection Alternative* should be deleted from the PEIR. This alternative discusses actions that would *not* be taken by the Draft General Plan; therefore, it is the same as the *No Project* alternative that identifies the existing condition. However, this discussion should not be included in the *No Project* alternative because its conclusions are not supported by fact. The City has achieved a positive jobs/housing ratio (when calculated based upon employed residents) under the current General Plan and is an "importer" of jobs. Secondly, the PEIR acknowledges that the City of San Diego has an adequate supply of industrial designated land to meet the time horizon of the Draft General Plan.

KK-7

Prime Industrial Lands: The Draft General Plan Proposal to include a Prime Industrial Lands Map is not discussed as an individual chapter to the PEIR; rather, this discussion is embedded in discussions of land use and alternatives. For the *City of Villages Increased Density Alternative* the City found an increase to community plan housing density would be inconsistent with the City's established community planning program. This issue is best discussed and resolved. We recommend the detailed discussion and environmental analysis necessary to resolve this issue be deferred to the Community Plan update process.

NAIOP is pleased to support the analysis conducted in the PEIR to further the adoption of the Draft General Plan and offer the resources of our over 400 members to assist in future implementation needs. We look forward to your responses and to our continuing dialogue on the Draft General Plan.

Respectfully,



Stephen Haase
NAIOP San Diego Chapter
Legislative Affairs Chair

KK-4 The General Plan Conservation Element and the PEIR have been revised to incorporate additional enforceable measures to reduce greenhouse gas emissions. See response to comment B-1.

KK-5 See response to comment B-1.

KK-6 CEQA requires a reasonable range of project alternatives. The alternatives presented in this document are a result of collaboration between DSD and Planning Department staff and discussion with other environmental professionals with experience in preparing regional level environmental documents.

KK-7 The PEIR is organized, per CEQA, by environmental issue area and not by land use type. The impacts associated with Industrial lands span several issue areas; therefore, industrial lands are discussed in more than one section of the PEIR. Note that the General Plan does not propose to change the densities within community plans. response to comment N-5 for further information.



July 3, 2007

Ms. Marilyn Mirrasoul
 Environmental Planner,
 City of San Diego
 1222 First Avenue
 San Diego, California 92101

AN ENVIRONMENTAL IMPACT REPORT (EIR) FOR THE CITY OF SAN DIEGO
 GENERAL PLAN UPDATE, NO. 104495, PROJECT (SCH# 2006091032)

Dear Ms. Mirrasoul:

LL-1

The Department of Toxic Substances Control (DTSC) has received your submitted Public Notice of an EIR for the above-mentioned project. The following project description is stated in your document: "The City of San Diego Draft General Plan is proposed to replace the existing 1979 Progress Guide and General Plan (1979 General Plan). The General Plan sets out a long-range, comprehensive framework for how the city will grow and develop, provide public services and maintain the qualities that define San Diego over the next 20-30 years. The proposed update has been guided by the City of Villages growth strategy and citywide policy direction contained within the General Plan Strategic Framework Element (adopted by the City Council on October 22, 2002). The Draft General Plan is comprised of an introductory Strategic Framework chapter and nine elements: Land Use and Community Planning, Mobility; Urban Design; Economic Prosperity; Public Facilities; Services and Safety; Recreation; Conservation, Noise; and Historic Preservation. The update to the Housing Element was adopted by the City Council under separate cover on December 5, 2006." DTSC provides comments as follows:

- 1) The EIR should identify the current or historic uses at the project site that may have resulted in a release of hazardous wastes/substances.
- 2) The EIR should identify the known or potentially contaminated sites within the proposed Project area. For all identified sites, the EIR should evaluate whether conditions at the site may pose a threat to human health or the environment. Following are the databases of some of the regulatory agencies:
 - National Priorities List (NPL): A list maintained by the United States Environmental Protection Agency (U.S.EPA).

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LL-1: County of San Diego Department of Environmental Health maintains a data base of HAZMAT sites within the City of San Diego on the internet at:
<http://www.lsdcounty.ca.gov/deh/permits/index.html>.

The Development Services Department's Significance Determination Thresholds include the criteria used in the review of discretionary projects. Sites that are located within 1,000 feet of a known contamination site; within 2,000 feet of a known "border zone property;" have DEH closed site files; are within Centre City or Barrio Logan; are on or near active or former landfills; are historically developed with industrial or commercial uses, or were presently or previously used for agricultural purposes would require additional environmental review by the environmental analyst, often in conjunction with DEH and/or the Local Enforcement Agency. A Phase I or II Environmental Site Assessment may be required which would include an investigation of potential site contaminants and any potential contamination resulting from the demolition of buildings and/or structures. As requirement of the development permit or as a mitigation condition, a clearance letter issued by the county of San Diego DEH would be required for development projects proposed for such sites or potentially contaminated sites.

COMMENTS

RESPONSES

Ms. Marilyn Mirrasoul
July 3, 2007
Page 2

- Envirostor (formerly CalSites): A Database primarily used by the California Department of Toxic Substances Control, accessible through DTSC's website (see below).
 - Resource Conservation and Recovery Information System (RCRIS): A database of RCRA facilities that is maintained by U.S. EPA.
 - Comprehensive Environmental Response Compensation and Liability Information System (CERCLIS): A database of CERCLA sites that is maintained by U.S. EPA.
 - Solid Waste Information System (SWIS): A database provided by the California Integrated Waste Management Board which consists of both open as well as closed and inactive solid waste disposal facilities and transfer stations.
 - Leaking Underground Storage Tanks (LUST) / Spills, Leaks, Investigations and Cleanups (SLIC): A list that is maintained by Regional Water Quality Control Boards.
 - Local Counties and Cities maintain lists for hazardous substances cleanup sites and leaking underground storage tanks.
 - The United States Army Corps of Engineers, 911 Wilshire Boulevard, Los Angeles, California, 90017, (213) 452-3908, maintains a list of Formerly Used Defense Sites (FUDS).
- 3) The EIR should identify the mechanism to initiate any required investigation and/or remediation for any site that may be contaminated, and the government agency to provide appropriate regulatory oversight. If necessary, DTSC would require an oversight agreement in order to review such documents. Please see comment No.17 below for more information.
- 4) All environmental investigations, sampling and/or remediation for the site should be conducted under a Workplan approved and overseen by a regulatory agency that has jurisdiction to oversee hazardous substance cleanup. The findings of any investigations, including any Phase I or II Environmental Site Assessment Investigations should be summarized in the document. All sampling results in which hazardous substances were found should be clearly summarized in a table.

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- 5) Proper investigation, sampling and remedial actions overseen by the respective regulatory agencies, if necessary, should be conducted at the site prior to the new development or any construction. All closure, certification or remediation approval reports by these agencies should be included in the EIR.
- 6) If any property adjacent to the project site is contaminated with hazardous chemicals, and if the proposed project is within 2,000 feet from a contaminated site, then the proposed development may fall within the "Border Zone of a Contaminated Property." Appropriate precautions should be taken prior to construction if the proposed project is within a Border Zone Property.
- 7) If buildings or other structures, asphalt or concrete-paved surface areas are being planned to be demolished, an investigation should be conducted for the presence of other related hazardous chemicals, lead-based paints or products, mercury, and asbestos containing materials (ACMs). If other hazardous chemicals, lead-based paints or products, mercury or ACMs are identified, proper precautions should be taken during demolition activities. Additionally, the contaminants should be remediated in compliance with California environmental regulations and policies.
- 8) The project construction may require soil excavation or filling in certain areas. Sampling may be required. If soil is contaminated, it must be properly disposed and not simply placed in another location onsite. Land Disposal Restrictions (LDRs) may be applicable to such soils. Also, if the project proposes to import soil to backfill the areas excavated, sampling should be conducted to ensure that the imported soil is free of contamination.
- 9) Human health and the environment of sensitive receptors should be protected during the construction or demolition activities. If it is found necessary, a study of the site and a health risk assessment overseen and approved by the appropriate government agency and a qualified health risk assessor should be conducted to determine if there are, have been, or will be, any releases of hazardous materials that may pose a risk to human health or the environment.
- 10) If it is determined that hazardous wastes are, or will be, generated by the proposed operations, the wastes must be managed in accordance with the California Hazardous Waste Control Law (California Health and Safety Code, Division 20, Chapter 6.5) and the Hazardous Waste Control Regulations (California Code of Regulations, Title 22, Division 4.5).

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- 11) If it is determined that hazardous wastes are or will be generated and the wastes are (a) stored in tanks or containers for more than ninety days, (b) treated onsite, or (c) disposed of onsite, then a permit from DTSC may be required. If so, the facility should contact DTSC at (714) 484-5423 to initiate pre-application discussions and determine the permitting process applicable to the facility.
- 12) If it is determined that hazardous wastes will be generated, the facility should obtain a United States Environmental Protection Agency Identification Number by contacting (800) 618-6942.
- 13) Certain hazardous waste treatment processes may require authorization from the local Certified Unified Program Agency (CUPA). Information about the requirement for authorization can be obtained by contacting your local CUPA.
- 14) If the project plans include discharging wastewater to a storm drain, you may be required to obtain an NPDES permit from the overseeing Regional Water Quality Control Board (RWQCB).
- 15) If during construction/demolition of the project, the soil and/or groundwater contamination is suspected, construction/demolition in the area would cease and appropriate health and safety procedures should be implemented.
- 16) If the site was used for agricultural or related activities, onsite soils and groundwater might contain pesticides, agricultural chemical, organic waste or other related residue. Proper investigation, and remedial actions, if necessary, should be conducted under the oversight of and approved by a government agency at the site prior to construction of the project.
- 17) Envirostor (formerly CalSites) is a database primarily used by the California Department of Toxic Substances Control, and is accessible through DTSC's website. DTSC can provide guidance for cleanup oversight through an Environmental Oversight Agreement (EOA) for government agencies, or a Voluntary Cleanup Agreement (VCA) for private parties. For additional information on the EOA please see www.dtsc.ca.gov/SiteCleanup/Brownfields, or contact Maryam Tasnif-Abbasi, DTSC's Voluntary Cleanup Coordinator, at (714) 484-5489 for the VCA.

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If you have any questions regarding this letter, please contact Ms. Teresa Hom, Project Manager, at (714) 484-5477 or email at thom@dtsc.ca.gov.

Sincerely,



Greg Holmes
Unit Chief
Southern California Cleanup Operations Branch - Cypress Office

cc: Governor's Office of Planning and Research
State Clearinghouse
P.O. Box 3044
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