

DRAFT CANDIDATE FINDINGS

(LDR EIR NO. 40-1027)

The California Environmental Quality Act (CEQA) requires that no public agency approve or carry out a project for which an environmental impact report has been completed which identifies one or more significant impacts unless such public agency makes one or more of the following findings:

A Findings

Changes or alternatives have been required in or incorporated into, the proposed project that mitigate or avoid the significant environments impacts identified in the completed environmental impact report.

B Findings

Such changes or alternatives are within the responsibility and jurisdiction of another public agency and such changes have been adopted by such other agency or can and should be adopted by such other agency.

C Findings

Specific economic, social, or other considerations make infeasible the mitigation measures or project alternatives identified in the environmental impact report.

(Section 21081 of the California Environmental Quality Act)

CEQA further requires that, where the decision of the public agency allows the occurrence of significant effects which are identified in the final EIR, but are not at least substantially mitigated, the agency shall state in writing the specific reasons to support its actions based on the Final EIR and/or information in the record (Section 15093 of the CEQA Guidelines).

The following Findings and Statement of Overriding Considerations have been submitted by the project applicant as candidate findings to be made by the decision making body. The Environmental Analysis Section of the City's Development Services Department does not recommend that the decision making body either adopt or reject these findings. They are attached to allow readers of this report an opportunity to review the applicant department's position on this matter.

A. FINDINGS REGARDING IMPACTS THAT CAN BE MITIGATED TO BELOW A LEVEL OF SIGNIFICANCE (CALIFORNIA PUBLIC RESOURCES CODE SEC. 21081(A)(1))

The City, having reviewed and considered the information contained in the FEIR, the appendices to the FEIR, and the administrative record, find, pursuant to California Public Resources Code Sec. 21081(a)(1) and CEQA Guideline Sect. 15091(a)(1), that changes or alterations have been required in, or incorporated into, the proposed Project which would mitigate, avoid, or substantially lessen to below a level of significance the following potentially significant

environmental effects identified in the FEIR in the following categories:

A. Air Quality

The state computer model, URBEMIS 7G, was used to estimate air pollutant emissions resulting from the potential 17,000 to 37,000 attached homes that might result from the subsequent implementation of the proposed City of Villages strategy. Table IV-11 shows the result of the modeling. Results include pollutants from motor vehicles use caused by the additional homes, construction of these new homes, and area source pollutants. Area source pollutants include use of house paints, fireplaces, landscape equipment, and evaporation of solvents in consumer products. The model indicated that development design features, design, and siting which encourage walking and bicycling in and around the potential villages and the vastly expanded public transit to these villages and along

Significance of Impact

For this analysis, it was assumed that all potential village centers and corridors would redevelop and result in a maximum of 37,000 attached homes. The analysis shows that passenger cars and pick-up trucks accounted for 93.64 tons of daily ROG emissions or 38% of the total estimate for 2000. Table IV-9 shows the declining trend of air pollutant emissions from passenger cars; roughly, the average car in 2020 would emit less than 20% of the emissions as in 2001. This reduction is similar for pick-up trucks. Even considering that vehicle use might continue to grow faster (1.5) than population increase (1.2) and assuming the maximum redevelopment of 37,000 additional attached homes, a rough estimate of ROG emissions in 2020 would be less than the current 243 daily tons of ROG. Currently at or slightly higher level of ROG emissions, the San Diego Air Basin has met the federal clean air standard for ozone for the past three years without a concurrent significant reduction in NO_x emissions. This may suggest that the proposed project would not significantly deteriorate ambient air quality for the region's current air quality concern, ozone.

Another consideration is the growth forecast used in the air quality strategy to attain the ozone standard. The baseline for ROG and NO_x, the SIP budget, was established based projections in the early 1990's, a projection similar to SANDAG's Series 8. For the county, Series 8 predicted 3.76 million people by 2015. This was slightly higher (3%) than the recent 2020 forecast. The 2020 forecast was used in the 2020 Regional Transportation Plan. This plan had an air quality conformity analysis that demonstrated that the motor vehicles accommodated by this plan would not adversely effect regional air quality effort to attain the ozone standard. Specifically, the analysis compared the regional motor vehicle emissions to the SIP budget. The proposed City of Villages might result in a potential maximum of 37,000 attached homes; the number of people living in these additional homes is less than 3% of the previously projected population for 2020.

Without a comprehensive update of the regional air quality forecast strategy by the SDAPCD and/or the CARB, using revised population growth forecast and considering the City's proposed City of Villages strategy, the impact to air quality is moot at best. In addition, the EMFAC modeling results for 37,000 additional attached homes, estimate pollutant levels even with

mitigation of increased transit and bicycle use and walking, in exceedance of City's significance criteria. Therefore, the project's air quality impact is considered significant and unmitigated.

Mitigation

Mitigation for air quality impacts is similar to mitigation for traffic congestion in that flattening out or distributing the peak-hour traffic will reduce congestion and will benefit air quality through faster, more efficient combustion of fossil fuels in progressively cleaner motor vehicles. However, in an area such as San Diego where the population has continually increased and regional efforts towards densification and improved transit have begun, another available solution is vehicle trip reduction. Trip reduction requires a dramatic sociological change from freeway/passenger car dominance to public transportation or alternative mode such as walking or bicycling. Between 1982 and 1987, four Transportation Control Measures (TCM's) were implemented as part of the regional strategy to attain clean air. They were bicycling, carpooling, transit improvements, and traffic flow improvements. The proposed City of Villages strategy compliments the two alternative mode TCM's, bicycling and transit improvements, as well as walkability through proposed vision of intensification of redeveloped/infilled mixed-uses and concentration of higher density attached homes in villages and transit corridors.

In addition to these local TCM's, the state was required to establish by the year 2000:

- Stricter California vehicle emissions standards,
- Adopt controls for off-road and construction vehicles, utility engines and boats,
- Adopt stricter evaporation specifications for fuels, and
- Control evaporative emissions (ROG) from certain area sources - consumer products containing oils, solvents, and other organic compounds.

Solutions to traffic congestion and subsequent air quality impacts on major roads and prime arterials cannot be resolved through the community planning process. Prime arterials and major roads carry traffic through a community. Solutions other than continual road-widenings, such as alternative transportation modes, require regional planning and coordination. Most of these larger roads could accommodate transit modes. To plan the routes, connections, stops, frequency and destinations to attract ridership requires regional planning. This regional effort has begun, and the proposed City of Villages strategy promotes the required land uses to implement the Regional Transportation Vision and the Transit First project.

The air quality model indicated that development design features, design, and siting which encourage walking and bicycling in and around the potential villages and the vastly expanded public transit to these villages and along corridors, result in a minimal 9%-10% potential reduction in the motor vehicle emissions. Potential partial mitigation measures and their effectiveness are described in Table IV 12.

It should be noted that there is a possibility that once potential villages are in place, transit service is vastly improved, and walking and bicycling become more attractive, areas surrounding the villages and corridors would be further lured to these alternative modes of transportation. The

current modeling does not account for these potential collateral benefits. Although partially mitigated, the project's air quality impact remains significant and unmitigated.

Table IV 12
Mitigation Measures for Reducing Motor Vehicle Emissions
from Residential Projects

Mitigation Measure	Supporting Factors to enhance Effectiveness	Effectiveness
Provide neighborhood-serving shops and services within or adjacent to (1/4 to 1/2 mile) residential project.	Direct pedestrian/bicycle access is available. Medium or high residential densities located closer to commercial areas. Jurisdiction has design guidelines addressing issues such as pedestrian access, parking, compatibility with neighboring land uses, etc.	1% to 4% (all trips)
Provide transit facilities, e.g., bus bulbs/turnouts, benches, shelters, etc.	Transit service is available in/adjacent to project. Project is of sufficient density to support transit service. Transit service with frequent headways. Consultation with transit provider during project design, review	0.2% to 2% (all trips)
Provide shuttle service to regional transit system or multimodal center.	Transit station or multimodal center located within 5 miles of project. Medium to high residential densities.	0.1% to 0.5% (all trips)
Provide shuttle service to major destinations such as employment, centers shopping centers, schools.	Destinations located within 5 miles of project. Medium to high residential densities.	0.1 % to 0.3% (all trips)
Provide bicycle lanes and/or paths, connected to community-wide network.	Local jurisdiction has adopted comprehensive bicycle plan Project is located adjacent to, or within 1/4 mile of, Class I bicycle path or Class II bicycle lane. Routes are direct and convenient, not curving recreational paths.	0.1 % to 2% (all trips)
Provide sidewalks and/or paths, connected to adjacent land uses, transit stops and/or community-wide network.	Destinations such as commercial areas, schools, parks, community centers, etc are nearby. Cul-de-sacs are discouraged, or easements are provided for pedestrian access. Shade trees/landscaping provided.	0.1 % to 1 % (all trips)
Provide interconnected street network, with a regular grid or similar interconnected street pattern.	Multiple ingress/egress points are available. Large, multi-lane arterials are discouraged. Reduced street widths and curb radii. Cul-de-sacs are discouraged. Street trees required.	1 % to 5% (all trips)
Provide satellite telecommute centers in large residential developments.	*Most effective if residential area is located far from employment centers.	0.1 % to 1 .5% (all trips)

B. Paleontological Resources

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. Adverse impacts occur when excavation activities cut into fossiliferous geological deposits, and cause physical destruction to fossil remains.

Once a subsequent development is subject to CEQA environmental review, the initial study would identify whether it is likely that potential subsurface, fossil resources are present on the site. If there is a moderate or higher potential for fossils to be present on a particular site, monitoring for paleontological resources is required during grading in order to mitigate potential significant impacts.

Significance of Impacts

Several current community plans identify preservation of paleontological resources as an environmental goal for their community. Since the proposed City of Villages would ultimately result in the redevelopment/infill of large, existing surface parking, it would encourage the development of separate parking structures or subterranean garages. While mass grading into fossil-bearing bedrock is not envisioned; there is a possibility of deep excavations for subterranean garages. If the excavated geologic formation has a high probability for fossils and the required excavation is into unweathered bedrock, fossils may be unearthed. If these fossils are unweathered and well preserved and if they add to our knowledge of paleo-ecology or represent type specimens, these resources must be considered significant

Mitigation

In the case of fossil resources, there has been enough scientific study of the San Diego region that the geologic rock formations likely to contain important fossils have been identified. The potential adverse impact of the proposed project could be reduced if the regulations required construction monitoring under appropriate circumstances. It is a standard City procedure that when a discretionary development project is proposed in a geologic formation that has been identified as yielding important resources and the site development requires grading deep enough to reach unweathered bedrock, monitoring for paleontological resources would be required during grading. However, paleontological resources even if detected, can be mitigated with strict adherence to standard mitigation measures.

When there is a possibility that the proposed excavation could encounter unweathered portions of a known fossiliferous rock formation. The following preventative measures, would need to be implemented to mitigate any significant impacts paleontological resources:

- A letter of verification shall be provided stating that a qualified paleontologist and /or paleontological monitor have been retained to implement the monitoring program. The requirement for paleontological monitoring shall be noted on the grading plans. All persons involved in the paleontological monitoring shall be approved by the City's Land Development Review (LDR).
- The qualified paleontologist shall attend any preconstruction meetings to discuss grading plans with the grading and excavation contractor.
- The paleontologist or paleontological monitor shall be on site full time during the initial cutting of previously undisturbed and unweathered areas within the known fossil-bearing geologic formation. Monitoring may be increased or decreased at the discretion of the

qualified paleontologist, in consultation with Land Development Review, and will depend on the rate of excavation, the materials excavated and the abundance of fossils.

- The paleontologist shall have the authority to divert, direct, or temporarily halt construction activities in the area of discovery to allow recovery of fossil remains. The paleontologist shall immediately notify LDR staff of such finding at the time of discovery. LDR shall approve salvaging procedures to be performed before construction activities are allowed to resume.
- If significant fossils are detected, the paleontologist shall be responsible for preparation of fossils to a point of identification as defined in the City of San Diego Paleontological Guidelines and submitting a letter of acceptance from a local qualified curation facility.
- Prior to the issuance of a certificate of occupancy, a paleontological monitoring results report, with appropriate graphics, summarizing the results, analysis, and conclusions of the paleontological monitoring program shall be submitted to LDR for approval. Where appropriate, a brief negative result letter report would satisfy this requirement.

The proposed City of Villages strategy, when implemented, would eventually result in land use intensification in Mission Valley and Downtown. Numerous previous geotechnical reports have been conducted in both areas. No structure is allowed to straddle the Rose Canyon Fault, and those built near the fault trace are required to conduct detailed, subsurface geotechnical studies to assure that any proposed structure would be seismically sound.

The proposed City of Villages would result in redevelopment and infill and would not increase impervious surfaces that may result in adverse impacts to natural hydrology and water quality with increased erosion. The proposal's resultant new redevelopment or infill projects on targeted large surface parking lots could have greater water quality effects; redevelopment would not only eliminate a large non-point source of urban runoff but would replace it with lower level parking and would capture runoff for treatment. During construction, recent regulations require the capture and treatment of all runoff from the site. Significant water erosion would not result from the proposed project.

Significance of Impact

Most geologic constraints are mitigable with proper engineering design and solutions and avoidance of active fault with sufficient setback of any proposed structure. All potential significant geologic impacts can be mitigated with strict adherence to the recommendations of the required site-specific, subsurface geotechnical investigations and all applicable regulatory requirements.

Mitigation Measures

The following measures should be considered in areas such as Downtown and Mission Valley where there are potential seismic risks. The measures for the project site preparation, site design, and construction would be specified in a site-specific study; typical measures would include:

- Monitor for differential settlement during construction.
- Assure proper compaction.
- Remove any undocumented fill.
- Install a well-compacted structural fill with geotextile reinforcing, where necessary.
- Complete a subsurface geotechnical investigation to evaluate the thickness of unconsolidated material determined to be susceptible to ground shaking. This investigation should provide site-specific grading recommendation, foundation design criteria, and design of surficial improvements.
- Prepare and implement a site-specific erosion control plan.

C. Noise

In residential areas, the City noise standard is 65 dBA at exterior usable areas. For interior areas of hotels, motels, and attached homes, the standard is 45 dBA. While the City Noise Ordinance has no interior standard for noise, the CEQA threshold is 45 dBA.

There are two dominant sources of noise, the ever-present roadway, traffic noise and noise along flight paths of the area airports and military airfields. Residents along freeways and major roads and those residing near airports and under flight paths may experience levels exceeding the City standards; exceedances pose significant noise impacts. Signal crossings for the trolley may also pose significant noise impacts for the immediate residences.

Traffic noise

The proposed City of Villages has identified potential village sites and corridors that may be adjacent to roads carrying enough traffic to pose significant noise impacts. Generally, significant noise impacts could occur if the resultant attached homes are within 50 feet of a road carrying 8,500 vehicles per day or within 100 feet of a road carrying 16,500 vehicles. In addition, potential village sites along area freeways may experience significant noise levels; it should be noted that elevated sites above busy roads and freeways would be subject to higher exposure than those below the roadway. The proposed project identifies the following corridors and villages for potential, subsequent intensification; future attached homes along these roads may be subject to significant traffic noise impacts:

- Bacon Street south of Voltaire (Lindbergh)*
- Euclid Avenue at Market Street (trolley)
- Friars Road-Mission Valley (at Mission Center)
- Garnet Avenue at Soledad Mountain
- Genesee Avenue at Balboa Ave
- Linda Vista Road at Via Las Cumbres
- Imperial Avenue west of 32nd Street (trolley)*
- Imperial Avenue west of Valencia Parkway (trolley)
- Market Street east of 25th Street*
- Mira Mesa Blvd at Black Mountain Road

- Mira Mesa Blvd at Camino Ruiz
- Mission Gorge Road north of I-8
- Morena Blvd north of Tecolote
- National Avenue at I-15*
- Palm Avenue west of Saturn Blvd
- Sports Arena Blvd west of Rosecrans*
- West Point Loma Blvd at Cable Street*
- 4th Avenue south of Laurel (Lindbergh)*
- 5th Avenue south of Laurel (Lindbergh)*
- 30th Street between University and El Cajon Blvd

The above roadways identified with an asterisk are potentially subject to traffic noise at 50 feet from the centerline of the road; the others are subject to significant noise at 100 feet. Some of the potential significant noise areas (as indicated) are also subject to noise from the trolley and from aircraft noise from Lindbergh Field.

The proposed City of Villages strategy would ultimately result in mixed-use residential and moderate to high-density residential units. All resultant residential units would be attached, multi-family and would be reviewed for noise impacts whether they are subject to discretionary review or not; they would be reviewed for noise ordinance compliance at the time of the issuance of building permits.

Significance of Impact

The Transportation Element of the Progress Guide and General Plan states that residential uses are compatible with annual community noise equivalent level of up to 65 decibels. There are clearly areas that exceed the 65 dBA CNEL that are identified by the proposed City of Villages for possible residential intensifications. However, there would be no impacted areas with elevated significant noise levels that could not be mitigated.

Mitigation Measures

All new residential development with exterior noise levels above 65dBA CNEL is determined to be exposed to significant noise impacts, and interior noise levels exceeding 45 dBA would also be exposed to a significant noise impact. For most construction methods and standard construction materials used in this area, exterior noise levels can be expected to be reduced only by 15 dBA. For noise impacted areas, to achieve the interior noise standard, additional insulation, double-pane windows, solid doors, less window area, mechanical ventilation, and upgraded construction material may be required; for areas impacted by aircraft noise, these additional features would be required for all new homes at the time building permits are obtained.

For traffic noise, significant noise levels can be mitigated with noise attenuation in addition to special construction material. These noise attenuation levels include such solid walls (masonry or

plexi-glass), setback, and site design where the residential structure is set at an optimal angle from the noise source or is blocked from noisy roads by structures containing less sensitive uses. The noise attenuating site design features for residential uses can be more easily accomplished with a mixed-use development.

D. Historical Resources

The proposed City of Villages strategy has identified the area in the vicinity of I-5 offramp at Garnet Avenue as a potential neighborhood village center. This area has a possibility of containing a portion of a suspected village site. The potential, subsequent intensification of land use (e.g. subterranean parking) on this site may result in an adverse effect on a subsurface archaeological resource. If this growth strategy is approved and this site is subsequently becomes planned and zoned for higher intensities, the potential for significant subsurface resources must be addressed prior to grading.

Potential Historic Resources

The proposed City of Villages strategy has identified the 25th Street as a potential neighborhood village center. The west side of 25th Street is in the Greater Golden Hill Historic District. Each of the five and one-half blocks on the west side of 25th Street has historic buildings that contribute to the historic district. Any new development that may ultimately result from this proposed growth strategy would most likely be adjacent to a historic structure. New development on the east side outside the district may effect the setting/integrity of the historic district.

The proposed City of Villages strategy has identified San Ysidro Boulevard west of I-805 as a potential transit corridor. This corridor traverses the potentially historic Little Lander's Colony. In addition, the designated San Ysidro Free Public Library is located on this potential transit corridor. Any new development that may ultimately result from this proposed growth strategy may effect the setting/integrity of the potentially historic area and the designated library.

The proposed City of Villages strategy has identified East San Ysidro Boulevard east of I-805 as a potential neighborhood village center. This area contains the historic El Toreador Motel. Any new development that may ultimately result from this proposed growth strategy may effect the setting/integrity of this historic area.

The proposed City of Villages strategy has identified the south side of Crosby Street as a potential neighborhood village center. This area contains the designated Chicano Park. Any new development that may ultimately result from this proposed growth strategy may effect the setting/integrity of this designated park, a cultural feature.

Significance of Impacts

The proposed City of Villages strategy may potentially result in land use intensification on an area with possible significant archaeological resources, on three areas with significant historic

resources, and an area of potential historic value. If the proposed growth strategy is adopted and these areas are selected for intensification, there could be potentially significant impacts to historic resources. If subsequent development results in the loss of a designated structure, reuse and alternatives to the proposal must be addressed.

Mitigation Measures

The resultant, potential redevelopment and infill discourages the continuing use of existing and/or the construction of new surface parking lots; the resultant desired urban residential densities and mixed-uses would most likely require subterranean parking levels. The subsurface excavation may adversely effect potential subsurface cultural resources.

Whenever potentially significant, subsurface cultural resources are suspected and if these resources are determined to be significant, the preferred mitigation measure is either avoidance or preservation in place. The City's Historical Resources Guidelines (as amended June, 2000) suggests the following mitigation measures for preservation:

- Site development design to avoid significant resources;
- Planning open space to preserve resources;
- Capping the resource; and/or
- Deeding the resource into permanent conservation easements.

When avoidance of significant, subsurface cultural resources (e.g. archaeological resources) is not feasible, the mitigation measure shall include research design and data recovery program. The required research design shall identify important research questions, link research topics to data already known to be present in the proposed development site, and explain procedures that would be used in the collection, analysis, and curation of recovered materials. The sample size, the area to be excavated for resources, would vary with the nature and size of the proposed development site.

When preservation of a significant historic structure on a development site, cannot be completely implemented, all feasible mitigation measures to minimize the significant impact to the historic resource shall be taken. These required mitigation measures can include, but not limited to:

- Preparing a historic resource management plan;
- Repairing damage to the historic structure according to the federal Secretary of Interior Standards for Rehabilitation;
- Adding new construction which is compatible to the historic resource; and/or
- Screening incompatible new construction from view through the use of barriers and or landscaping, which would be in keeping with the historic period and character of the resource.

The last two measures which address preserving the setting and screening of a significant historic resource are also appropriate to resultant development adjoining a significant historic structure. The goal of these measures is to preserve the integrity and context of the significant resource.

When preservation of a significant historic structure on a development site is not viable and the historic structure needs to be moved off-site, the relocation shall be performed in accordance with National Parks Service standards. The relocation site shall duplicate, as closely as possible, the original location. In addition, the historic structure shall be documented according to Historic American Building Survey (HABS) or Historic American Engineering Record (HAER) standards.

When the significant, historic structure cannot be preserved or relocated and it needs to be demolished, it shall be documented according to HABS or HAER standards prior to demolition.

As discussed above, impacts to significant historic resources can be mitigated with strict adherence to standard mitigation measures. Any action involving a historically designated structure would trigger a discretionary permit and would be subject to CEQA review. The loss of a historically designated structure may be mitigated; however, the proposal that results in the loss would be subject to addressing alternatives including reuse of the structure and disclosing the evaluation in a site-specific environmental impact report.

Any potential impacts to significant historical resources posed by the subsequent intensification allowed by the implementation of this proposed growth strategy, can be mitigated. Therefore, the potential impacts of this growth strategy are considered significant and mitigable.

E. Solid Waste Disposal

Impacts

The important factor is landfill capacity; Miramar Landfill would be filled and long closed by 2020. The City of San Diego has an agreement with Allied, Inc. the owner/operators of Sycamore Landfill in East Elliott to give San Diego preferred customer status if there is room to handle San Diego's waste after the municipal landfill closes.

The proposed City of Villages strategy could result in a potential to yield an additional 17,000 to 37,000 attached homes by 2020. Based on current annual generation rate for attached homes and small businesses (1.18 ton per unit), the project's additional attached homes could generate 20,000 to 44,000 tons of refuse.

Attached homes would have less landscaping waste than attached homes (as evidenced by the water usage); this may reduce the waste stream. However, some of these units would be built on redeveloped sites and there would be construction/demolition waste that would need to be disposed; this may offset the reduced waste stream of the additional attached homes.

Significance of Impacts

The proposed City of Villages strategy would identify potential area for possible intensification. The proposed growth strategy, if adopted and fully implemented, could result in 17,000 to 37,000 attached homes; these homes would generate 20,000 to 44,000 tons of waste on an annual basis. In addition, the implementation of the proposed growth strategy would most likely require demolition of existing structures; this would add to the project's impact. These impacts are considered potentially significant.

While there is some assurance that once the City's Miramar Landfill closes in 10 to 14 years, the Sycamore Landfill would be able to handle the City's refuse. There remains some uncertainty about the solid waste disposal capacity for the City. Currently, there is no landfill siting effort occurring in the City.

Mitigation Measure

Partial mitigation to reduce the significant waste disposal impact would be to extend the cycling program to attached homes and larger businesses. This would reduce the refuse generated by the additional attached homes and mixed-use intensification potentially engendered by the proposed City of Villages growth strategy. Additional partial mitigation would be on site reuse of demolition materials for new asphalt paving and other uses.

However, the major concern is the limited remaining life of the City's Miramar Landfill and the uncertainty of adequate capacity at the privately-owned Sycamore Landfill to handle the City's projected waste stream, let alone, accommodate the additional refuse expected to be generated by the project's resultant potential yield of 17,000 to 37,000 attached homes in 2020. The project's potentially impact on the future, solid waste disposal capacity remains significant and not mitigated.

F. Public Health and Safety

Impacts

Impacts associated with on-going use or sites contaminated with hazardous material pose a potential significant effect on human health.

Toxic air contaminants include pollutants known to cause cancer and other adverse health effects such as respiratory irritation or reproductive effects. Levels measured in El Cajon and Chula Vista show that toxic air pollutants had decreased 37% between 1990 and 1999. There are no specific health standards for toxic air pollutants. Its sources are similar to other pollutants in that the majority, fifty-nine percent, is estimated to be emitted from motor vehicles.

Significance of Impacts

The proposed City of Villages would result in the possible addition of 17,000 to 37,000 attached homes in potential mixed-use villages and corridors within the urban core. Two areas targeted by this proposed growth policy are Mission Valley and Centre City. The condition as it relates to hazardous materials, for Centre City have been described previously in this section. For an area such as Mission Valley that was in agricultural for the first part of the last century, much of the valley may have been spared any contamination from commercial/ industrial processes. Redevelopment in most parts of the long urbanized areas especially along commercial corridors, would most likely encounter hazardous materials. This would pose a significant health and safety impact.

Toxic air contaminants are required to be strictly controlled by APCD rules and regulation. APCD reports that toxic air contaminant emissions should not necessarily be equated with a significant health risk to any individual or the public.

Mitigation Measures

Mitigation of contaminated hazardous material site can only be developed when the location and its specific problem can be determined. Mitigation occurs in phases of investigation. Initially, a Phase I assessment must be conducted where the site is checked for signs of spills or empty barrels or rusted storage tanks; any indication that suggests hazardous material use and spills is noted. The second part of this initial assessment is to conduct a record search to determine any use of hazardous materials on site. If evidence suggests a potential problem, confirmation must be made by subsurface collection of soil samples and laboratory analysis of the samples. If contaminated, remediation may include soil removal or soil remediation. The level of cleanup is based upon how the site would be used once it is remediated. For instance, level of cleanup for an area of open space would be much lower than if residences were to be constructed. Remediation is usually possible but it may be costly and time consuming. These standard measures would mitigate any potentially significant effect due to hazardous materials, to below a level of significance.

G. Recreational Facilities

Impact

There is an existing deficit in park and recreation facilities in the urbanized core area of the City of San Diego. The proposed City of Villages strategy may result in the addition of 17,000 to 37,000 detached homes in intensified, mixed-use villages. Most of the potential areas are located in the urbanized core; much of these areas already have a need for parkland and/or recreational facilities.

Significance of Impacts

The proposed project with a potential resultant of 17,000 to 37,000 additional attached homes beyond the current plan/zone yield would add to this shortfall and therefore, may pose a significant effect on these facilities.

Mitigation Measures

The current Recreation Element of the Progress Guide and General Plan currently states that the neighborhood and community recreational facilities should take a variety of forms in response to needs of the residents. It states further that both types of facilities should respond to the unique characteristics of the area; the type of facilities and open space should relate to the population and use characteristics of the service area. It goes on to explain that the requirements are guidelines and not fixed needs and that where parkland is difficult to acquire, effort to provide park staff and facilities should be directed to compensate deficiencies in acreage of parkland. The existing General Plan contains flexibility to provide adequate recreational opportunities to the future residents of villages. The current guideline of 20 acres per thousand people is difficult to attain for the higher, density, attached homes envisioned by the proposed growth strategy. For example, 1,000 people could be accommodated in 370 attached village homes; at a low-moderate density of 30 units per acre, the current guideline, strictly applied, would result in a need of 20 acres of parks/open space for 12 acres of additional attached homes. These guidelines need to be revised or alternatively applied for the mixed-use, higher density attached homes.

As discussed previously and as shown on Figure 7, there are opportunities for enhancement of the smaller urban canyons for wildlife, aesthetic, water quality benefit, and passive recreational use. This is especially true for those canyons containing older, failing sewer lines and stormwater outfalls. Restoration seed money can be obtained from mitigation needs for utility work in these canyons and from required water quality controls.

The potential resultant increased yield of attached homes and its potential significant effect on parks and recreational facilities can be mitigated to below a level of significance in two ways. Either provide more activities or facilities on existing parkland as the current element allows or find alternative sites for enhancement/improvement such as the urban canyons with planted riparian trees and plants and trail system to access the canyon. Either would mitigate potential significant effects to below a level of significance.

H. Geologic Hazards

Centre City and Mission Valley are susceptible to seismic hazards posed by the active Rose Canyon fault. The proposed City of Villages strategy, when implemented, would eventually result in land use intensification in Mission Valley and Centre City. Numerous geotechnical reports have been conducted in both areas. No structure is allowed to straddle the Rose Canyon Fault, and those to be built near the fault trace are required to conduct detailed, subsurface geotechnical studies to assure that any proposed structure would be seismically sound.

Most geologic constraints are mitigable with proper engineering design and solutions and with the avoidance of active fault with sufficient setback of any proposed structure. All potential significant geologic impacts can be mitigated with strict adherence to the recommendations of the required site-specific, subsurface geotechnical investigations and all applicable regulatory requirements.

The following measures should be considered in areas such as Downtown and Mission Valley where there are potential seismic risk. The measures for the project site preparation, site design, and construction would be specified in a site-specific study; typical measures would include:

- Monitor for differential settlement during construction.
- Assure proper compaction.
- Remove any undocumented fill.
- Install a well-compacted structural fill with geotextile reinforcing, where necessary.
- Complete a subsurface geotechnical investigation to evaluate the thickness of unconsolidated material determined to be susceptible to ground shaking. This investigation should provide site-specific grading recommendation, foundation design criteria, and design of surficial improvements.
- Prepare and implement a site-specific erosion control plan.

I. Noise

The Transportation Element of the Progress Guide and General Plan states that residential uses are compatible with annual community noise equivalent level of up to 65 decibels.

There are clearly areas along larger roads and freeways or within the aircraft noise impact area of Lindbergh Field which exceed the 65 dBA CNEL and which were identified by the proposed City of Villages for possible residential intensifications. However, there would be no impacted areas with elevated significant noise levels that cannot be mitigated.

Mitigation Measures

All new residential development which would be subjected to exterior noise levels above 65dBA CNEL is determined to be exposed to a significant noise impact, and interior noise levels exceeding 45 dBA would also be exposed to a significant noise impact. For most construction methods and standard construction materials used in this area, exterior noise levels can be expected to be reduced only by 15 dBA. For noise impacted areas, to achieve the interior noise standard, additional insulation, double-pane windows, solid doors, less window area, mechanical ventilation, and upgraded construction material may be required; for areas impacted by aircraft noise, these additional features would be required for all new homes at the time building permits are obtained.

For traffic noise, significant noise levels can be mitigated with noise attenuation in addition to special construction material. These noise attenuation include such as solid walls (masonry or

plexi-glass), setback, and site design where the residential structure is set at an optimal angle from the noise source or is blocked from the noisy road by structures containing less sensitive uses. The noise attenuating site design features for residential uses can be more easily accomplished with a mixed-use development.

J. Public Health and Safety

The proposed City of Villages would result in the possible addition of 17,000 to 37,000 attached homes in potential mixed-use villages and corridors within the urban core. Two areas targeted by this proposed growth policy are Mission Valley and Centre City. The condition as it relates to hazardous materials, for Centre City have been described previously in this section. For an area such as Mission Valley that was in agricultural for the first part of the last century, much of the valley may have been spared any contamination from commercial/ industrial processes. Redevelopment in most parts of the long urbanized areas especially along commercial corridors, would most likely encounter hazardous materials. This would pose a significant health and safety impact.

Toxic air contaminants are required to be strictly controlled by APCD rules and regulation. APCD reports that toxic air contaminant emissions should not necessarily be equated with a significant health risk to any individual or the public.

Mitigation Measures

Mitigation of contaminated hazardous material site can only be developed when the location and its specific problem can be determined. Mitigation occurs in phases of investigation. Initially, a Phase I assessment must be conducted where the site is checked for signs of spills or empty barrels or rusted storage tanks; any indication that suggests hazardous material use and spills is noted. The second part of this initial assessment is to conduct a record search to determine any use of hazardous materials on site. If evidence suggests a potential problem, confirmation must be made by subsurface collection of soil samples and laboratory analysis of the samples. If contaminated, remediation may include soil removal or soil remediation. The level of cleanup is based upon how the site would be used once it is remediated. For instance, level of cleanup for an area of open space would be much lower than if residences were to be constructed. Remediation is usually possible but it may be costly and time consuming. These standard measures would mitigate any potentially significant effect due to hazardous materials, to below a level of significance.

K. Historical Resources

The proposed City of Villages strategy may potentially result in land use intensification on an area with possible significant archaeological resources, on three areas with significant historic resources, and an area of potential historic value. If the proposed growth strategy is adopted and these areas are selected for intensification, there could be potentially significant impacts to

historic resources. If subsequent development results in the loss of a designated structure, reuse and alternatives to the proposal must be addressed.

Mitigation Measures

The resultant, potential redevelopment and infill discourages the continuing use of existing and/or the construction of new surface parking lots; the resultant desired urban residential densities and mixed uses would most likely require subterranean parking levels. The subsurface excavation may adversely effect potential subsurface cultural resources.

Whenever potentially significant, subsurface cultural resources are suspected and if these resources are determined to be significant, the preferred mitigation measure is either avoidance or preservation in place. The City's Historical Resources Guidelines (as amended June, 2000) suggests the following mitigation measures for preservation:

- Site development design to avoid significant resources;
- Planning open space to preserve resources;
- Capping the resource, and/or
- Deeding the resource into permanent conservation easements.

When avoidance of significant, subsurface cultural resources (e.g. archaeological resources) is not feasible, the mitigation measure shall include research design and data recovery program. The required research design shall identify important research questions, link research topics to data already known to be present in the proposed development site, and explain procedures that would be used in the collection, analysis, and curation of recovered materials. The sample size, the area to be excavated for resources, would vary with the nature and size of the proposed development site.

When preservation of a significant historic structure on a development site, cannot be completely implemented, all feasible mitigation measures to minimize the significant impact to the historic resource shall be taken. These required mitigation measures can include, but not limited to:

- Preparing a historic resource management plan;
- Repairing damage to the historic structure according to the federal Secretary of Interior Standards for Rehabilitation;
- Adding new construction which is compatible to the historic resource, and/or
- Screening incompatible new construction from view through the use of barriers and or landscaping, which would be in keeping with the historic period and character of the resource.

The last two measures which address preserving the setting and screening of a significant historic resource are also appropriate to resultant development adjoining a significant historic structure. The goal of these measures is to preserve the integrity and context of the significant resource.

When preservation of a significant historic structure on a development site is not viable and the historic structure needs to be moved off-site, the relocation shall be performed in accordance with National Parks Service standards. The relocation site shall duplicate, as closely as possible, the original location. In addition, the historic structure shall be documented according to Historic American Building Survey (HABS) or Historic American Engineering Record (HAER) standards.

When the significant, historic structure cannot be preserved or relocated and it needs to be demolished, it shall be documented according to HABS or HAER standards prior to demolition.

As discussed above, impacts to significant historic resources can be mitigated with strict adherence to standard mitigation measures. Any action involving a historically designated structure would trigger a discretionary permit and would be subject to CEQA review. The loss of a historically designated structure may be mitigated; however, the proposal that results in the loss would be subject to addressing alternatives including reuse of the structure and disclosing the evaluation in a site-specific environmental impact report.

Any potential impacts to significant historical resources posed by the subsequent intensification allowed by the implementation of this proposed growth strategy, can be mitigated. Therefore, the potential impacts of this growth strategy is considered significant and mitigable.

L. Paleontological

Several current community plans identify preservation of paleontological resources as an environmental goal for their community. Since the proposed City of Villages would ultimately result in the redevelopment/infill of large, existing surface parking, it would encourage the development of separate parking structures or subterranean garages. While mass grading into fossil-bearing bedrock is not envisioned; there is a possibility of deep excavations for subterranean garages. If the excavated geologic formation has a high probability for fossils and the required excavation is into unweathered bedrock, fossils may be unearthed. If these fossils are unweathered and well preserved and if they add to our knowledge of paleo-ecology or represent type specimens, these resources must be considered significant

Mitigation

In the case of fossil resources, there has been enough scientific study of the San Diego region that the geologic rock formations likely to contain important fossils have been identified. The potential adverse impact of the proposed project could be reduced if the regulations required construction monitoring under appropriate circumstances. It is a standard City procedure that when a discretionary development project is proposed in a geologic formation having been identified as yielding important resources and the site development requires grading deep enough to reach unweathered bedrock, monitoring for paleontological resources would be required during grading. However, paleontological resources even if detected, can be mitigated with strict adherence to standard mitigation measures.

When there is a possibility that the proposed excavation could encounter unweathered portions of a known fossiliferous rock formation. The following preventative measures, would need to be implemented to mitigate any significant impacts paleontological resources:

A letter of verification shall be provided stating that a qualified paleontologist and or paleontological monitor have been retained to implement the monitoring program. The requirement for paleontological monitoring shall be noted on the grading plans. All persons involved in the paleontological monitoring shall be approved by the City's Land Development Review (LDR).

- The qualified paleontologist shall attend any preconstruction meetings to discuss grading plans with the grading and excavation contractor.
- The paleontologist or paleontological monitor shall be on site full time during the initial cutting of previously undisturbed and unweathered areas within the known fossil-bearing geologic formation. Monitoring may be increased or decreased at the discretion of the qualified paleontologist, in consultation with Land Development
- Review, and will depend on the rate of excavation, the materials excavated and the abundance of fossils.
- The paleontologist shall have the authority to divert, direct, or temporarily halt construction activities in the area of discovery to allow recovery of fossil remains. The paleontologist shall immediately notify LDR staff of such finding at the time of discovery. LDR shall approve salvaging procedures to be performed before construction activities are allowed to resume.
- If significant fossils are detected, the paleontologist shall be responsible for preparation of fossils to a point of identification as defined in the City of San Diego Paleontological Guidelines and submitting a letter of acceptance from a local qualified curation facility.
- Prior to the issuance of a certificate of occupancy, a paleontological monitoring results report, with appropriate graphics, summarizing the results, analysis, and conclusions of the paleontological monitoring program shall be submitted to LDR for approval. Where appropriate, a brief negative result letter report would satisfy this requirement.

B. FINDINGS REGARDING IMPACTS WHOSE MITIGATION IS WITHIN THE RESPONSIBILITY AND JURISDICTION OF ANOTHER AGENCY (CALIFORNIA PUBLIC RESOURCES CODE SEC. 21081(A)(2))

The City, having reviewed and considered the information contained in the FEIR, the appendices to the FEIR, and the administrative record, find, pursuant to California Public Resources Code Sec. 21081(a)(2) and CEQA Guideline Sect. 15091(a)(2), that there are no significant impacts for which mitigation measures can and should be adopted by another public agency.

C. FINDINGS REGARDING INFEASIBLE ALTERNATIVES AND MITIGATION MEASURES (CALIFORNIA PUBLIC RESOURCES CODE SEC. 21081(A)(3))

The City, having reviewed and considered the information contained in the FEIR, the appendices to the FEIR, and the administrative record, find, pursuant to California Public Resources Code Sec. 21081(a)(3) and CEQA Guideline Sect. 15091(a)(3), that (i) The FEIR considers a reasonable range of Project alternatives and mitigation measures, and (ii) specific economic, community environmental, fiscal, open space and resource, and mobility and other considerations, make infeasible the alternatives identified in the FEIR and, therefore, the Project will cause significant unavoidable impacts in the categories of air quality, transportation, and solid waste.

II. ALTERNATIVES

A. Alternatives Considered but Rejected

City of Villages B Higher Intensity Scenarios

The previous SANDAG 2020 population forecast indicated a need for 50,000 homes in the City of San Diego in addition to those already anticipated in existing community plans. In attempting to accommodate this predicted shortfall, the initial proposed City of Villages strategy identified potential areas (villages/corridors) for possible intensification. This would have resulted in an estimated 45,000 to 70,000 attached homes. The revised preliminary forecast for the year 2030 showed that the shortfall for the year 2020 has been reduced to 17,000 homes. The number and/or intensity of potential village sites has been reduced and proposed project yield has been revised to 17,000 to 37,000 units.

An alternative to the previous higher yield proposal considered potential development occurring at the highest end of the range on every possible village site and corridor throughout the City. This high-intensity scenario would result in the addition of between 70,000 to 105,000 dwelling units beyond those already anticipated in existing community plans. If divided evenly over the next 18 years (to reach 2020), the resultant annual production would be between 9,000 and 12,000 units.

Development at such intensity would exceed the City's forecasted population growth and development needs through 2020. If designed and built according to the provisions of the proposed strategy, the higher intensity projects may have provided an even greater level of support for a world-class transit system than would the proposed strategy. Higher density development could result in an even greater population base within village locations available to support a more diverse array of retail uses.

Increasing the City's overall housing supply to such a level may ultimately result in a decrease in housing prices. Focusing even more of the City's growth into villages may have reduced possible encroachment into the County's back country. Provision of a greater supply of housing would also reduce the need for those employed within the city limits to meet their housing needs outside

of the region. This could result in less traffic congestion along Interstates 5 and 15. However, traffic on local roads feeding onto the freeways in the vicinity of the villages would most likely been significantly increased in this alternative compared to the proposed strategy.

Historically, over the last 30-40 years, approximately 8,000 housing units have been constructed per year in the City. During the late 1980's, a period of accelerated economic growth due to the growth of the uniformed services, military contracts and aerospace manufacturing, and the visitor industry, development substantially exceeded this average. Additionally, builders constructed most of these new units in the planned urbanizing area on easier to develop, vacant, unsubdivided land.

Although past development patterns and historical trends do not necessarily predict the future, it is reasonable to conclude that such a vigorous rate of development would result in many of the same negative impacts seen in the 1980's. In light of the revised, reduced population forecast, this rate of development appears unwarranted. Therefore, this higher intensity alternative was rejected.

It is also reasonable to conclude that projects at the highest end of the density range are likely to be built in communities such as Centre City and Mission Valley, and that depending upon the economy and demand for housing, higher densities could be realized on village sites around the City. This scenario, while unlikely and unnecessary during the immediate twenty-year planning horizon, may occur over a much longer period of time, perhaps in the next 50 years. Continued growth, geographic expansion, and increase in function and complexity of existing villages may result in additional intensification in the long term.

More importantly, whereas the City of Villages strategy envisions that the greatest share of redevelopment and of village development will occur as redevelopment or infill in older communities, it is anticipated that there will be a gradual shift northward as the newer communities along Interstates 5 and 15 begin to age and experience redevelopment pressure. During the period after 2020, it is anticipated that a significant share of redevelopment and of village development will occur in the northern portion of the City in addition to some further intensification of the villages built before 2020.

Facts in Support of Finding: The significant and unmitigated impacts to traffic, air quality, and landfill capacity and significant but mitigated impacts to recreational facilities would be made worse than the proposed project. Other significant but mitigated impacts to paleontological resources, geologic hazards, historical resources, and human health and safety would remain the same as proposed project. This alternative will meet and exceed the expressed need of attached housing units of the proposed project.

B. General Intensification Alternative

This alternative would, like the proposed City of Villages project, add approximately 17,000 to 37,000 homes above the number of units currently accommodated by existing community plans. However, instead of being located in villages and meeting specific criteria, the additional units

would be distributed equally throughout every community in the City. The number of units to be added in each community would be allocated by acreage. Units could be added to the individual communities in various ways including adding companion units, subdividing parcels, redevelopment of underutilized parcels, adding residential units in commercial areas and increasing zoning and/or amending community plans.

The major advantage of this alternative is that there would be significant flexibility and neighborhood/community input regarding how to accommodate additional housing and employment within communities. This alternative would be more market-driven than the proposed project.

This alternative has several disadvantages. The lack of clear policy on where additional units should be accommodated throughout the City would most likely mean that the additional development would tend to be more scattered and less focused on transit and pedestrian oriented locations than would be the case with the proposed City of Villages alternatives. In addition, there would likely be more encroachment into remaining undeveloped open space areas. Difficult to develop environmentally sensitive parcels would come under increased development pressure. In the long run, a less efficient overall land use pattern would likely result from this alternative. The additional residents would most likely continue to use automobiles for most trips with only a small portion walking, bicycling or using transit. This alternative would, therefore, not be compatible with MTDB's Transit First planning vision. If transit improvements could not be adequately supported or used, traffic congestion would be more severe with this alternative than with others. This alternative would also result in serious continuing impacts on air and water pollution and possibly on sensitive biological resources. It would likely be more costly to provide infrastructure and public services to the relatively inefficient growth anticipated in this alternative.

The lack of a clear policy on where and how growth would result in this alternative being particularly susceptible to local opposition aimed at density increases. It would most likely be very difficult to meet the density targets in certain communities, particularly in communities dominated by detached, residential development.

Facts in Support of Finding: The significant and unmitigated impacts to traffic, air quality, and landfill capacity, and significant but mitigated impacts to recreational facilities would be made worse than the proposed project. Other significant but mitigated impacts to paleontological resources, geologic hazards, historical resources, and human health and safety would remain the same as proposed project. This alternative will meet the expressed need of attached housing units of the proposed project.

C. Slowed Growth/Reduced Alternative

This alternative can be achieved in two ways: the number and intensity of potential villages and corridors identified by the proposed City of Villages could be reduced to provide fewer additional homes than are anticipated to be needed or the City could actively attempt to influence

its growth rate. For environmental purposes, the analysis will focus on reducing the housing capacity.

The reduced yield scenario focuses on the most likely areas to intensify with high-density, mixed-use with increased employment opportunities. This reduced yield could be achieved by intensifying only a few areas including Centre City (Downtown) and one or more selected subregional districts. The selected subregional district must be well-located to enable use of the anticipated improved transit linkages with Downtown and other major activity centers Mission Valley, for example, is already connected to Downtown by the trolley and soon will be connected to San Diego State University and eventually to La Mesa. La Mesa is also already connected to Downtown via a separate trolley line. This will create a transit loop around the south-central portion of the City's urban core as well as the adjoining cities of Lemon Grove and La Mesa.

The slowed growth scenario does not accept the results of a recent SANDAG draft *Evaluation of Growth Slowing Policies for the San Diego Region* (April, 2001) report which concludes that local government can not significantly impact the rate of population growth. Instead this alternative assumes that certain policies can influence the population growth rate with a goal of attaining a growth rate in conformance with San Diego's natural carrying capacity. Subsidies to growth inducing industries and businesses would be eliminated. The slow growth alternative assumes that various tools could be used to impact the growth rate and could be targeted in particular to restrict growth of low paying jobs such as those in the tourism and hospitality sector because the high housing costs in San Diego make it very difficult to provide affordable housing to workers in low paying sectors of the economy. Some of the tools that would be used to restrict growth and improve the quality of life in this alternative are higher business and hotel room taxes, business license caps and elimination of subsidies and incentives to expand growth inducing services and amenities such as the airport, convention center and commercial visitor attractions on leased City lands.

The pattern of future growth anticipated in this alternative would be the same as that projected in the proposed City of Villages strategy. While the rate of growth of villages would be slower, the pattern would be the same with new development concentrated in villages or nodes served by transit and oriented toward pedestrian and transit access.

Major advantages of this alternative are that slower population growth would allow more time for any existing utilities and facilities deficiencies to be resolved and for housing construction to catch up to demand. In addition there may, over the long term, be a better match between jobs and housing supply. Pressure to develop remaining open space areas and to impact natural resources would be reduced.

This alternative would potentially have many impacts as well. Attempts to slow or reduce growth usually result in disproportionate impacts on lower income individuals and households and could have particularly negative impacts on elderly people and members of minority groups. Job growth would be inhibited in certain industries resulting in more unemployment and forcing some people to leave the city. Any attempts to limit housing production to reduce growth would have severe negative consequences in this City which already has an acute housing shortage. While a slower rate of growth could reduce the pace at which natural resources are lost or

impacted, such impacts may merely be delayed rather than eliminated unless the region's population stabilizes and the employment becomes far less growth-dependant.

If growth is slowed within the City without similar regional growth slowing efforts, environmental impacts outside the City will be exacerbated. Much of the housing and employment expected to locate within the City may instead locate in undeveloped sections of San Diego County and adjacent Riverside County. The negative environmental impacts associated with this development would likely be even greater than would have been the case had this growth occurred within the City. In particular, regional freeway traffic congestion associated with growth continuing to sprawl out into undeveloped areas may be exacerbated by a slow growth policy in the City of San Diego.

Facts in Support of Finding: The significant and unmitigated impacts to traffic, air quality, and landfill capacity and significant but mitigated impacts to recreational facilities would be slightly better than the proposed project; the significance determinations would remain unchanged. Other significant but mitigated impacts to paleontological resources, geologic hazards, historical resources, and human health and safety would remain the same as proposed project. This alternative would not meet the expressed need of attached housing units of the proposed project.

D. No Project Alternative

Under the No Project Alternative, the City of Villages Strategy would not be implemented and housing needs would be addressed by planned housing levels contained in the approved community plans throughout the City. Although it is anticipated that some infrastructure and transit improvements would be constructed to accommodate planned development, for purposes of this alternative it is assumed that the proposed regional transit vision without the City's City of Villages could not be optimized.

Effects of No Project Alternative on Housing Supply and Pricing

Under the No Project alternative the anticipated housing shortage within the City would not be adequately addressed. Current population forecasts anticipate a need for a minimum of 17,000 homes beyond those currently planned in adopted community plans.

The continuation of a serious housing shortage would make it difficult to provide housing affordable to lower and middle-income sectors of the population. The No Project alternative does not make provisions for additional multiple-family housing beyond that currently permitted by individual community plans. Additional multiple-family housing is necessary to address the anticipated housing shortage. Due to high land costs in San Diego, multi-family housing is generally more affordable than single-family housing.

Lack of provision of an adequate supply of housing will also be likely to increase the number of families forced to share homes. The City's population would still increase, as would impacts to public facilities. Overall, the quality of life in many of the City's neighborhoods and for many of the City's residents may decrease due to the continuing housing shortage.

Transit, Traffic Congestion, and Air Quality

The inability of the City to address anticipated housing shortages would result in additional indirect impacts. Higher intensity projects are necessary to support improvements to the transit system. Improvements to the transit system including new trolley and bus routes beyond the minimum necessary to address existing needs would be less viable in the no project alternative than in the proposed City of Villages strategy. The lack of targeted locations for more intense development in the no project alternative would likely result in scattered development throughout the developing communities that is conducive to increased transit use and service.

Additional traffic congestion is also likely with the No Project Alternative because a lower proportion of trips would be by transit than in the City of Villages strategy. The No Project Alternative would also increase air quality impacts beyond those associated with the proposed project. However, this alternative's impact on air quality due to less transit improvements is unknown.

The City of Villages strategy proposes increased development in older communities with a gradual shift over time to newer communities along Interstate 5 and 15. It is anticipated that focusing growth and housing demand in urbanized areas will reduce the pressure to extend development further into the unincorporated "back country" areas. This reduction in the rate of sprawl would not occur under the No Project Alternative because, under this alternative, new housing development would not be focused on infill and redevelopment areas.

Targeting increased housing development to urbanized areas associated with the proposed project would also reduce pressure to develop environmentally sensitive vacant parcels throughout the County including those that may contain sensitive biological resources. Implementation of the No Project alternative would not have a corresponding benefit in decreasing adverse effects to biological resources.

Development pressure on vacant lands associated with implementation of the No Project alternative may also result in adverse impacts to water quality and hydrology not anticipated with the proposed project. The City of Villages concept anticipates that future developments in infill and urbanized areas would incorporate the latest Best Management Practices into site designs to ensure that stormwater runoff from village areas does not adversely impact ambient water quality pollution levels. Without the proposed effort to target development to infill areas, the resulting pressure to impact vacant lands will require alteration of natural hydrologic patterns by altering landforms and eliminating natural vegetation. Increasing the extent of impervious surfaces will result in adverse impacts to natural hydrology and water quality not anticipated with the proposed project. In addition, the City of Villages proposal's focus on redevelopment or infill projects on targeted large surface parking lots could provide benefits to water quality. Redevelopment of these lots would eliminate a large non-point source of urban runoff and replace it with structured or underground parking. This would allow capturing runoff for treatment.

Facts in Support of Finding: The significant and unmitigated impacts to traffic and air quality, would be made slightly worse than the proposed project. The significant and unmitigated impacts to landfill capacity would be less than the proposed project. Other significant but mitigated

impacts to recreational facilities paleontological resources, geologic hazards, historical resources, and human health and safety would remain the same as proposed project. This alternative would not meet the expressed need of attached housing units of the proposed project.

**DRAFT CANDIDATE
STATEMENT OF OVERRIDING CONSIDERATIONS
STRATEGIC FRAMEWORK PLAN (LDR NO. 40-1027)
CEQA Guidelines for Section 21081(B)
CEQA Guidelines Section 15093**

The Final EIR (the “FEIR”) for the implementation of the City of Villages strategy including the Strategic Framework Element, Action Plan, and adoption of interim TOD Design Guidelines (the “Project”) identifies significant environmental effects which would not be mitigated to below a level of significance and which would be allowed to occur as a result of the approval of the Project. Although Project impacts have been avoided or substantially mitigated as described in the FEIR and the Findings, the FEIR states that the Project would have a significant impact on Air Quality, Solid Waste, and Transportation that cannot be mitigated at this policy stage. The City of San Diego, after balancing the specific community, social, economic, environmental, fiscal or other benefits of the Project, determines that the unavoidable adverse environmental effects may be considered “acceptable” due to the following specific consideration, each of which is independently sufficient to outweigh the unavoidable adverse environmental impacts of the Project.

The primary goal of the Strategic Framework Element and Action Plan is to enhance quality of life for all San Diegans. Continued growth unquestionably presents the City with many challenges. Yet, with the City of Villages strategy, new village centers will be built in a compact form through redevelopment or infill of commercial areas and the addition of mixed-use to create a focal point for new development as well as for the adjacent, existing neighborhood. Through this strategy, it becomes possible to leverage growth to achieve quality of life benefits. As new or enhanced neighborhood centers are realized throughout the City connected by an improved and expanded transit system, it will create an opportunity to achieve the core values of San Diego’s citizens and maximize the positive aspects of concentrated, planned growth as it occurs. As implementation of the Strategic Framework Plan proceeds, the following benefits will accrue:

1. COMMUNITY

Revitalization of Communities. A series of community centers will be established to provide a sufficient population base in key locations to support neighborhood services in the form of local shops, restaurants, business, cultural centers, theatres, and other services; create street level activity and vitality that enhance the sense of community as well as to improve safety by increasing eyes on the streets; and create public art and public spaces such as pocket parks, squares, greens and plazas, and amphitheaters to help generate a sense of neighborhood and city identity, and to provide a connected open space system.

Preservation of Single-Family Neighborhoods. By directing growth into specific infill

commercial areas, single-family neighborhoods will be preserved.

Preservation of Community Character. San Diego takes pride in its distinctive neighborhoods as well as the beauty and character of the city as a whole. Targeting growth into limited areas, and planning for the needed facilities, results in the best opportunity to preserve our neighborhood character as well as the City's most treasured citywide natural resources and amenities. A major focus of village development will be the implementation of community-specific urban design guidelines to preserve and enhance community character and identity.

2. HOUSING

Provision of Affordable Housing. Implementation of the Strategic Framework Growth Strategy will reduce the need for families to locate outside of the region in search of attainable housing opportunities. Low-income families now account for 50 percent of the region's population (SF Element). Declining middle-income job opportunities and increasing housing costs add to the problems of concentrated poverty and poor school performance (SF Element). The 1999 rental vacancy rate for the City was estimated to be extremely low (1-3%) (SF EIR pg I-9). In 1998, the National Association of Homebuilders ranked San Diego as the 15th least affordable market in the country (SF EIR pg I-9). In 1998, only about 25 percent of the San Diego households could afford the median priced home of \$215,000 (SF EIR pg I-9). In March 2002, the median price for a home in San Diego County increased to \$300,000 (UT-March 14, 2002). The ability of families to afford market rate housing will continue to decrease considering that the housing supply provided under existing plans will fall approximately 17,000 units short of accommodating the projected San Diego population increase of 382,000 people by 2020 (SF EIR pg I-8). The 17,000-unit shortfall is the housing demand that will be addressed by the increased multifamily housing opportunities proposed as a part of the Strategic Framework strategy for growth and development.

Less Residential Overcrowding. There are only two sources of regional population growth, net migration and natural increase. Local government has no control over the major determinants of growth, such as number of births in San Diego, the number of military personnel or the rate of foreign immigration. Since growth cannot be eliminated, the number of persons per household would continue to increase without planning for additional residential units in appropriate areas.

3. FISCAL AND PUBLIC FACILITIES

More Efficient Utilization of Fiscal Resources. Regionally beneficial development and land use patterns allow for regionalization of infrastructure expenses. Implementation of the strategy through prioritization of citywide and community facility needs, use of shared resources, and identification of additional user fee and taxation measures can provide the additional benefit of enhanced public facilities and services, such as parks, libraries, fire facilities, and local roadway improvements and amenities.

4. OPEN SPACE/RESOURCES

Reduction of Development Pressure on Rural and Sensitive Areas. By proposing to target growth to existing highly urbanized areas, implementation of the Strategic Framework Growth Strategy will reduce pressure to develop areas of potentially sensitive open space and rural portions of San Diego County. San Diego has almost reached its current plan build-out with the exception of Otay Mesa in the southern portion of the City (SF EIR pg IV-1). Less than 10 percent of the developable land within the City remains vacant (SF EIR pg IV-1). The Strategic Framework Growth strategy proposes to focus growth into mixed-use urban villages in existing urbanized areas within the City municipal boundaries. Reduction of the need for families to locate outside of the region can also lessen congestion on regional and local roadways.

Increased Environmental Quality. Policies and efficient land use patterns as envisioned in the strategy support the conservation and restoration of natural and imported resources such as energy, open space, wildlife, biodiversity, geographical features soils, coastal features, wetlands, waterways, and water quality and supply. It encourages the development of “green buildings” and increased protection of human health.

5. ECONOMIC

Provision of Opportunities for Increased Economic Prosperity. Key planning and economic policies are provided and will be aligned to a cohesive strategy to provide the following benefits:

1. *Efficient Use of Employment Lands:* Job growth can be sustained by utilizing employment lands more efficiently. Opportunities for the retention and expansion of middle-income industries, such as manufacturing will be preserved. Village development can revitalize communities through the strategic location of employment and new commercial development in subregional districts, village areas, and corridors.
2. *Business Development:* The strategy proposes to retain and expand local businesses which provide the overwhelming majority of jobs in the region, most of the wealth creation, and, directly or indirectly, most of the tax revenues that pay for public investments and services.
3. *Equitable Development:* Currently, the growing visitor industry and retail and business service occupations do not typically offer middle-income jobs with medical benefits and low-income families now account for 50 percent of the region’s population. The Element and Action Plan provides for a more equitable distribution of economic opportunity, access to educational facilities, and the retention of middle-income job opportunities.
4. *U.S./Mexico Border:* Strengthening border relations is required to remedy border infrastructure problems. Implementation of the strategy would create more coherent land development policies for the border area to enable the City to better utilize its remaining supply of employment land.

6. MOBILITY

Support for a World-Class Transit System. The proposed Strategic Framework Growth Strategy will better support improved transit services, walkability, and reduced auto dependence than the planned densities and types of transportation improvements anticipated with approved community plans. The Strategic Framework Growth Strategy promotes targeted infill/ redevelopment of mixed-use urban villages predominantly on existing shopping centers sites and transit corridors in developed portions of the City. Mixed-use villages would combine commercial, office, public, and residential uses to become neighborhood centers accessible by foot, bicycle, and transit. These centers would be linked to an expanded network of improved transit services. By focusing on creating mixed-use activity centers, providing a land use mix and density supportive of transit, increased community-wide access to transit, integrating transit into village design, promoting walkable community designs, increasing bicycle opportunities, and supporting transit priority measures on City streets, the Strategic Framework policies are essential components of the Transit First strategy developed by the Metropolitan Transit Development Board (MTDB), and it is unlikely that the Transit First network could be effectively implemented in the absence of the land use coordination and transit priority measures included in the City of Villages strategy. Implementation of the Transit First strategy would result in a world-class transit system that is competitive with the automobile.

Opportunity to Avoid Congestion through Transit and Multi-Modal Transportation. The City of Villages strategy calls for a convenient, efficient, and attractive multi-modal transportation system. Key policies to implement this vision include: linking land use and transportation, making targeted improvements to streets and highways, managing parking resources, putting Transit First, and creating walkable and bicycle-friendly communities. Without the transit and multi-modal improvements included in the project, San Diegans would have fewer options to bypass congested conditions.

The EIR reports that there would be an overall transit and walking mode split of approximately 10 percent citywide. This 10 percent mode split is a citywide, 24-hour average. Achieving a 10 percent transit, walking, and bicycling mode split is a major achievement, yet this figure still understates the significance of this improvement, since congestion has its biggest impact on people's lives in key corridors, during peak commute times. Transit is ideally suited for these critical peak periods and along key corridors, because there are many people traveling the same route, at the same time.

Nearly one in five (18.1%) peak hour, home-work trips (citywide) will be by transit, walking and bicycling with implementation of the City of Villages and the Transit First network, in the year 2020. For comparison, existing peak hour, home-work transit and walking trips total 6.7%. This dramatic increase in citywide transit use is especially noteworthy given that the number of homes built under the City of Villages strategy are sited on less than 5 percent of the City's land area, and represent less than 5 percent of the City's total number of units anticipated to be on the ground in 2020.

Transit ridership generated by City of Village developments and a state of the art transit system would likely be even higher than the citywide average, due to the villages' walkable community designs, mixed-use development, higher densities, and accessibility to the best regional transit services. A study of transit-oriented development near rail stations in San Francisco Bay area cities found that developments near transit have a significantly higher shares of trips made by transit (on average, 5 times more likely to use transit) than the regional average.

Minimization of Congestion and other Mobility Improvements. Implementation of the City of Villages strategy, the Transit First strategy, and other multi-modal improvements such as High Occupancy Vehicle Lanes, Transportation Demand Management, Transportation Systems Management and Regional Infrastructure Improvements will provide greater mobility options for people and result in the following improvements:

- Decrease in congested freeway miles from 77 miles to 29 miles (62% decrease).
- Increase in Vehicle Occupancy from 1.1 persons/vehicle to 1.35 persons/vehicle (23% increase).
- Achieve approximately 10% of all trips by transit, walking, and biking.
- More than double peak hour, home-work transit ridership from 6.6% to 15.9% .
- Result in nearly 1 in 5 peak-hour, home-work trips being made by transit, walking, and bicycling (18.1% mode split)
- Develop and design villages to significantly improve citywide accessibility to transit.
- Provide competitive and even preferred alternatives to the automobile for many trips in the region through enhanced opportunities and infrastructure for carpooling, walking, transit, and biking.

The City of San Diego finds that substantial evidence of benefits in the areas of community, housing, fiscal/public facilities, environmental, open space/resources, economic, and mobility would result from approval and implementation of the Project. The City of San Diego finds that the need for these benefits specifically overrides the impacts of the project on air quality, solid waste, and transportation.