

THE CITY OF SAN DIEGO

PLANNING DEPARTMENT Date of Notice: November 4, 2015 PUBLIC NOTICE OF THE PREPARATION OF A PROGRAM ENVIRONMENTAL IMPACT REPORT AND SCOPING MEETINGS INTERNAL ORDER No. 21002576/11001369

PUBLIC NOTICE: The City of San Diego as the Lead Agency has determined that the project described below will require the preparation of a Program Environmental Impact Report (PEIR) in compliance with the California Environmental Quality Act (CEQA). This Notice of Preparation (NOP) of a PEIR and Scoping Meetings was publicly noticed and distributed on **November 4, 2015**.

This notice was published in the SAN DIEGO DAILY TRANSCRIPT and placed on the City of San Diego Planning Department website under the heading "Draft CEQA Documents" and can be accessed using the following link: http://www.sandiego.gov/planning/programs/ceqa/index.shtml

The NOP has also been placed on the City Clerk website at: http://www.sandiego.gov/city-clerk/officialdocs/notices/index.shtml.

SCOPING MEETING: Two public scoping meetings will be held by the City of San Diego's Planning Department, one for Midway-Pacific Highway on **Wednesday, November 18, 2015** from 5:30 PM to 7:30 PM at the San Diego Continuing Education Center, West City Campus, 3249 Fordham Street, Room 205, San Diego, CA 92110, and one for Old Town San Diego on **Friday, November 20, 2015** from 3:00 PM to 5:00 PM at the Caltrans District 11 Office, Garcia Auditorium, 4050 Taylor Street, San Diego, CA 92110. **Please note that depending on the number of attendees, the meeting could end earlier than the end times noted above.** Verbal and written comments regarding the scope and alternatives of the proposed PEIR will be accepted at the meeting.

Please send in written/mail-in comments to the following address: Susan Morrison, Environmental Planner, City of San Diego Planning Department, 1010 Second Avenue, MS 614C, San Diego, CA 92101 or e-mail your comments to PlanningCEQA@sandiego.gov with the Project Name and Number in the subject line within 30 days of the receipt of this notice/date of the Public Notice above. Responsible agencies are requested to indicate their statutory responsibilities in connection with this project when responding. A PEIR incorporating public input will then be prepared and distributed for the public to review and comment.

PROJECT NAME: Midway-Pacific Highway and Old Town San Diego Community Plan Updates PROJECT NO.: 453425 COMMUNITY PLAN AREAS: Midway-Pacific Highway and Old Town San Diego COUNCIL DISTRICTS: 2 (Zapf) and 3 (Gloria) APPLICANT: City of San Diego, Planning Department **PROJECT DESCRIPTION:** The project is the update of two adjacent Community Plans – Midway-Pacific Highway and Old Town San Diego. The proposed updates for both plans provide a long term comprehensive policy framework for growth and development in these communities, and would serve as the basis for guiding a variety of other actions such as streetscape, public facilities, and infrastructure improvements. The updates incorporate relevant policies from the 2008 City of San Diego General Plan and provide community specific land use designations, and policies and recommendations. Each Community Plan contains introduction and implementation chapters and the following elements: Land Use; Mobility; Urban Design; Economic Prosperity; Public Facilities, Services, and Safety; Conservation; Recreation; Noise; and Historic Preservation. Although separate community plans are being prepared for each community, the updated Community Plans would be evaluated in a single PEIR.

In addition to adoption of the two community plan updates, the project includes: Amendments to the General Plan to incorporate the updated community plans; Providing site-specific policies; Amendments to the Land Development Code for adoption of a rezone and Community Plan Implementation Overlay Zones (CPIOZ); Amendment to the Old Town San Diego Planned District Ordinances (PDO): and Comprehensive updates to both existing Public Facilities Financing Plans resulting in two new Impact Fee Studies (IFS) for each plan area. The actions together with the proposed CPUs form the Project for this EIR. Discretionary actions by other agencies include recommendation from the San Diego County Regional Airport Authority and the California Coastal Commission.

Midway-Pacific Highway

The Midway-Pacific Highway Community Plan area is an urbanized community that encompasses approximately 1,313 acres of land situated north of Downtown. The community is comprised of three areas: the Midway area, the Pacific Highway Corridor, and the Marine Corps Recruit Depot. A portion of the Pacific Highway Corridor is within the Coastal Zone and subject to the California Coastal Act as implemented by the Midway-Pacific Highway Local Coastal Program and zoning regulations. The Coastal Height Limit Overlay Zone also applies to the entire Midway-Pacific Highway community. This Overlay Zone limits construction of new development to 30-feet in height to protect coastal views.

The Midway-Pacific Highway Community Plan and Local Coastal Program (Community Plan) provides goals and policies establishment of distinct districts and villages connected through a system of landscaped streets to create a sense of place and pedestrian and bicycle linkages to Mission Bay Park, the San Diego River Park, Old Town San Diego, and San Diego Bay, and to traditional and nontraditional parks within the community. The plan envisions multi-modal improvements to address vehicular needs, enhance the pedestrian environment with streetscape and sidewalk improvements, and improve bicyclist experience by providing bicycle facilities. The Community Plan further envisions Midway-Pacific Highway as a multiple use sub-regional employment center, with strong employment and residential components.

Old Town San Diego

Old Town San Diego has significant historical importance for the City of San Diego. It is the site of initial settlement in the City and the birthplace of the State of California. The 274-acre community contains 37 properties that have been designated as historical resources by the San Diego Historical Resources Board or designated at state and/or national levels.

The updated Community Plan provides goals and policies that preserve and enhance the historical significance of the area and support a balance between residential and visitor-oriented uses. The updated Community Plan provides land use and urban design policies to ensure that new development is historically compatible with an appearance reflective of the community's history prior to 1871. The updated Old Town San Diego Planned District within the Municipal Code implements the Community Plan policies through zoning and development

regulations and controls pertaining to land use density and intensity, building massing, landscape, streetscape, parking, and other criteria.

The updated Community Plan includes discussions and policies to improve the understanding of the historic context of Old Town; incorporates the architectural and site development standards and criteria into the Urban Design element for new development in the community; and provides updated photographs, illustrations, graphics, and maps that capture examples of historically compatible architecture and urban design within Old Town. The Community Plan envisions Old Town San Diego as a pedestrian-oriented historical small town. It seeks to ensure that new buildings and uses enhance the community character and livability with a strong emphasis on design that respects the history of the community and encourages pedestrian activity. To achieve this vision, the Community Plan specifies context sensitive policies for land use by sub-district. The Community Plan recommends mobility and streetscape improvements to enhance the pedestrian environment. Improvements would be consistent with the historic character of the community and would incorporate design features that relate to Old Town San Diego's small-town scale and history.

The Planning Department is also soliciting public input and comments on both draft community plan updates covered in this NOP. These documents can be reviewed on the Planning Department website at: http://www.sandiego.gov/planning/community/cpu/oldtownmidway/pdf/midway_pacific_highway_cpu_draft.pd

http://www.sandiego.gov/planning/community/cpu/oldtownmidway/pdf/oldtownsdcpuseptember2015.pdf

Recommended Finding: Pursuant to Section 15060(d) of the CEQA Guidelines, it appears that the proposed project may result in significant environmental impacts in the following areas: Land Use, Transportation/Circulation, Visual Effects and Neighborhood Character, Air Quality, Greenhouse Gas Emissions, Energy, Noise, Historical Resources, Biological Resources, Geologic Conditions, Paleontological Resources, Hydrology and Water Quality, Public Services and Facilities, Public Utilities, Health and Safety, and Population and Housing.

Availability in Alternative Format: To request the this Notice or the City's letter to the applicant detailing the required scope of work (EIR Scoping Letter) in alternative format, call the Planning Department at (619) 235-5200 or (800) 735-2929 (TEXT TELEPHONE).

Additional Information: For environmental review information, contact Susan Morrison at (619) 533-6492. The Scoping Letter and supporting documents may be reviewed, or purchased for the cost of reproduction, in the Planning Department at 1010 Second Avenue, Suite 1400. For information regarding public meetings/hearings on this project, contact Senior Planner, Vickie White at (619) 533-3945 or via email: <u>VWhite@sandiego.gov</u>. This notice was published in the SAN DIEGO DAILY TRANSCRIPT and distributed on November 4, 2015.

Martha Blake Interim Deputy Director Planning Department

DISTRIBUTION: See Attached

ATTACHMENTS: Regional Location Map Scoping Letter

DISTRIBUTION LIST:

Copies of the NOP were distributed to the following individuals, organizations, and agencies:

United States Government

Federal Aviation Administration (1)
Naval Facilities Engineering Command, SW Division, Environmental Planning (12)
Marine Corps Recruit Depot Facilities Div. (14)
Environmental Protection Agency (19)
U. S. Fish and Wildlife Service (23)
Army Corps of Engineers (26)

State of California

Caltrans District 11 (31) Department of Fish and Wildlife (32) Cal Recycle (35) California Environmental Protection Agency (37A) Department of Toxic Substance Control (39) Housing and Community Development (38) Natural Resources Agency (43) Regional Water Quality Control Board, Region 9 (44) State Clearinghouse (46A) California Coastal Commission (47) California Air Resources Board (49) California Transportation Commission (51) California Department of Transportation (51A) Native American Heritage Commission (56) California State Parks, San Diego Coast District (40A) California Department of Parks and Recreation, Southern Service Center (40B)

San Diego County

Air Pollution Control Board (65) Planning and Land Use (68) Parks Department (69) Public Works (72) County Water Authority (73) Department of Environmental Health (76)

City of San Diego

Office of the Mayor (91) Council President Lightner, District 1 Councilmember Zapf, District 2 Councilmember Gloria, District 3 Councilmember Cole, District 4 Councilmember Kersey, District 5 Councilmember Zapf, District 6 Councilmember Sherman, District 7 Councilmember Alvarez, District 8 Council President Pro Tem Emerald, District 9

<u>Office of the City Attorney</u> Shannon Thomas

Planning Department

Jeff Murphy, Director Tom Tomlinson, Assistant Director Nancy Bragado, Deputy Director Martha Blake, Interim Deputy Director Tait Galloway, Program Manager Vickie White, Project Manager – Long Range Planning Elizabeth Ocampo, Associate Planner – Long Range Planning Myra Herrmann, Senior Planner Susan Morrison, Associate Planner Kristy Forburger, Senior Planner – MCSP Samir Hajjiri, Mobility Planning Maureen Gardiner, Mobility Planning Jeff Harkness, Park Planning Oscar Galvez III, Facilities Financing

<u>Environmental Services Department</u> Lisa Wood, Senior Planner

<u>Development Services Department</u> Angela Nazareno, Project Manager

<u>Public Utilities Department</u> Halla Razak, Director John Helminski Keli Balo

<u>Public Works Department</u> James Nagelvoort, Director

<u>Park and Recreation Department</u> Herman Parker, Director Andrew Field

<u>Fire-Rescue Department</u> Chief Brian Fennessy Chief Rick Wurts

<u>Police Department</u> Chief Shelley Zimmerman Transportation & Storm Water Department

Kris McFadden, Director Andrew Kleis Ruth Kolb Linda Marabian Mark Stephens

<u>Real Estate Assets Department</u> Cybele Thompson, Director

<u>Economic Development Department</u> Cody Hooven, Director

<u>City Government</u> San Diego Housing Commission (88)

City Advisory Boards or Committees

Park and Recreation Board (83) Community Forest Advisory Board (90) Historical Resources Board (87) Wetland Advisory Board (91A)

Libraries

Central Library, Government Documents (81 & 81A) Linda Vista Branch Library (81M) Mission Hills Branch Library (81Q) Mission Valley Branch Library (81R) Ocean Beach Branch Library (81V) Point Loma/Hervey Branch Library (81Z)

Other City Governments

San Diego Association of Governments (108) San Diego Unified Port District (109) San Diego County Regional Airport Authority (110) Metropolitan Transit System (112/115) San Diego Gas & Electric (114)

School Districts

San Diego Unified School District (125) San Diego Community College District (133)

Community Planning Groups or Committees

Community Planners Committee (194) Midway/Pacific Highway Community Planning Group (307) Mission Valley Unified Planning Organization (331) Old Town Community Planning Committee (368) Uptown Planners (498)

Community Councils

Mission Valley Community Council (328 C)

Other Agencies, Organizations and Individuals

San Diego Chamber of Commerce (157) **Building Industry Association (158)** San Diego River Park Foundation (163) San Diego River Coalition (164) Sierra Club (165) San Diego Canyonlands (165A) San Diego Natural History Museum (166) San Diego Audubon Society (167) Jim Peugh (167A) San Diego River Conservancy (168) Environmental Health Coalition (169) California Native Plant Society (170) San Diego Coastkeeper (173) Citizens Coordinate for Century 3 (179) Endangered Habitats League (182 & 182A) League of Women Voters (192) Carmen Lucas (206) South Coastal Information Center (210) San Diego Historical Society (211) San Diego Archaeological Center (212) Save Our Heritage Organization (214) Ron Chrisman (215) Clint Linton (215B) Frank Brown - Inter-Tribal Cultural Resource Council (216) Campo Band of Mission Indians (217) San Diego County Archaeological Society Inc. (218) Kuumeyaay Cultural Heritage Preservation (223) Kuumeyaay Cultural Repatriation Committee (225) Native American Distribution Barona Group of Capitan Grande Band of Mission Indians (225A) Campo Band of Mission Indians (225B) Ewiiaapaayp Band of Mission Indians (225C) Inaja Band of Mission Indians (225D) Jamul Indian Village (225E) La Posta Band of Mission Indians (225F) Manzanita Band of Mission Indians (225G) Sycuan Band of Mission Indians (225H) Viejas Group of Capitan Grande Band of Mission Indians (225I) Mesa Grande Band of Mission Indians (225J) San Pasqual Band of Mission Indians (225K) Ipai Nation of Santa Ysabel (225L) La Jolla Band of Mission Indians (225M) Pala Band of Mission Indians (225N)

Pauma Band of Mission Indians (2250) Pechanga Band of Mission Indians (225P) Rincon Band of Luiseno Indians (225Q) San Luis Rey Band of Luiseno Indians (225R) Los Coyotes Band of Mission Indians (225S) San Diego River Park Foundation (333) Friends of the Mission Valley Preserve (330B) Midway/Pacific Highway Community Planning Group (307) Old Town Community Planning Committee (368) Old Town Chamber of Commerce (369) Presidio Park Council (370) Kim Adler Karl Anderson Hector Baca Jaime Barton **Dorothy Benavides** Jack Borgos Walter Bradfield **Bill Cardenas** Jo-AnnCarini Robert Chakarian Monique Chausse Ron Christman Trevor Clarke Neva Cobian Philip Conard Mal & Saundra Daniel Robert De Anthony Otto Emme Ed Farley JeannieFerrell Walter Fiedler Graham Forbes Michael Freedman Jim Gallagher **Elaine Garrett** Judy Gervais Joe Ghio Glen Gundert William Haifley Gudrun Hoffmeister Tom Hoyt Robert Johnson Roy Johnson William Kenton Maureen King Robin Kole

Marti Kranzberg Fong-Ping Lee Doug Livingston Brian Longmore Nora Lovejoy Joe Mannino Nancy McGehee Ann Merritt Omar Mobayed Lisa Mortensen Jerry Navarra Ignacio Orduno Donal O'Sullivan **Guy Preuss** Gary Pryor Bianca Romani Donald Rudesill Jim Seman **Dennis Sharp** Vera Shepard **Betty Slater** Arlette Smith **Gregory Smith** Caroline St Clair Dean Stratton Margaret Townsend **Richard Warner** Clifford Weiler Patti Adams Don Arthur Hector Baca Jaime Barton Murtaza Baxamusa Bryan Bebb Fred Blecksmith Walter Bradfield Dixie Brien Jo-Ann Carini Chris Clifford Neva Cobian Philip Conard Don Correia Sheila Deuchars Sheila Donovan Otto Emme Walter Fiedler Graham Forbes

Jim Gallagher **Elaine Garrett** Tom Gawronski Joe Ghio Edwina Goddard Jennifer Goudeau Glen Gundert William Haifley Gudrun Hoffmeister Ed Huggin Rob Hutsel **Richard Jensen** Robert Johnson Roy Johnson Bob Kennedy Robin Kole Marti Kranzberg Fong-Ping Lee Brian Longmore Nora Lovejoy Judy Maddox Alan Marshall Ward Martin Nancy McGehee Omar Mobayed Robert Orphey Donal O'Sullivan John Pedersen **David Pettigrew Guy Preuss** Gary Pryor **Dale Pursel** Patti Rank Jorgen Rasmussen John Rickards Christine Robinson Mignon Scherer **Richard Sells** Jim Seman **Dennis Sharp** T Sheldon Arlette Smith **Gregory Smith R** Smith Dean Stratton Anne Terhune Thomas Traver

Kim Wallace Clifford Weiler Lee Winslett Diana Woodside Anthony Briggs Law Corporation





Regional Location Map

<u>Midway-Pacific Highway and Old Town San Diego Community Plan Updates</u> City of San Diego – Planning Department



DATE: November 4, 2015

SUBJECT: Scope of Work for a Draft Program Environmental Impact Report for the Midway-Pacific Highway and Old Town San Diego Community Plan Updates

Pursuant to Section 15060(d) of the California Environmental Quality Act (CEQA), the Environmental and Resource Analysis (E&RA) Division of the City of San Diego Planning Department has determined that the proposed project may have significant effects on the environment, and the preparation of a Program Environmental Impact Report (PEIR) is required for the Midway/Pacific Highway and Old Town San Diego Community Plan Updates.

The purpose of this letter is to identify the specific issues to be addressed in the PEIR. The PEIR shall be prepared in accordance with the "City of San Diego Technical Report and Environmental Impact Guidelines" (Updated December 2005). The project issues to be discussed in the PEIR are outlined below. A Notice of Preparation (NOP) has been distributed to Responsible Agencies and others who may have an interest in the project as required by CEQA Section 21083.9(a) (2).

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 the threshold, and two public scoping meetings have been scheduled: one for Midway-Pacific Highway on **Wednesday**, **November 18, 2015** from 5:30 PM to 7:30 PM at the San Diego Continuing Education Center, West City Campus, 3249 Fordham Street, Room 205, San Diego, CA 92110, and one for Old Town San Diego on **Friday**, **November 20, 2015** from 3:00 PM to 5:00 PM at the Caltrans District 11 Office, Garcia Auditorium, 4050 Taylor Street, San Diego, CA 92110.

Please note, changes or additions to the scope of work may be required as a result of public input received in response to the NOP and Scoping Meeting. In addition, the applicant may adjust the project over time, and any such changes would be disclosed in the PEIR.

Each section and issue area of the Program EIR should provide a descriptive analysis of the project followed by a comprehensive evaluation. The Draft PEIR should also include sufficient graphics and tables to provide a complete description of all major project features.

Project Description

The project is the update of two adjacent Community Plans – Midway-Pacific Highway and Old Town San Diego. The proposed updates for both plans provide a long term comprehensive policy framework for growth and development in these communities, and would serve as the basis for guiding a variety of other actions such as streetscape, public facilities, and infrastructure improvements. The updates incorporate relevant policies from the 2008 City of San Diego General Plan and provide community specific land use designations, and policies and recommendations. Each Community Plan contains introduction and implementation chapters and the following elements: Land Use; Mobility; Urban Design; Economic Prosperity; Public Facilities, Services, and Safety; Conservation; Recreation; Noise; and Historic Preservation. Although separate community plans are being prepared for each community, the updated Community Plans would be evaluated in a single PEIR.

In addition to adoption of the two community plan updates, the project includes: Amendments to the General Plan to incorporate the updated community plans; Providing site-specific policies; Amendments to the Land Development Code for adoption of a rezone and Community Plan Implementation Overlay Zones (CPIOZ); Amendment to the Old Town San Diego Planned District Ordinances (PDO): and Comprehensive updates to both existing Public Facilities Financing Plans resulting in two new Impact Fee Studies (IFS) for each plan area. The actions together with the proposed CPUs form the Project for this EIR. Discretionary actions by other agencies include recommendation from the San Diego County Regional Airport Authority and the California Coastal Commission.

Midway-Pacific Highway

The Midway-Pacific Highway Community Plan area is an urbanized community that encompasses approximately 1,313 acres of land situated north of Downtown. The community is comprised of three areas: the Midway area, the Pacific Highway Corridor, and the Marine Corps Recruit Depot. A portion of the Pacific Highway Corridor is within the Coastal Zone and subject to the California Coastal Act as implemented by the Midway-Pacific Highway Local Coastal Program and zoning regulations. The Coastal Height Limit Overlay Zone also applies to the entire Midway-Pacific Highway community. This Overlay Zone limits construction of new development to 30-feet in height to protect coastal views.

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The updated Community Plan includes discussions and policies to improve the understanding of the historic context of Old Town; incorporates the architectural and site development standards and criteria into the Urban Design element for new development in the community; and provides updated photographs, illustrations, graphics, and maps that capture examples of historically compatible architecture and urban design within Old Town. The Community Plan envisions Old Town San Diego as a pedestrian-oriented historical small town. It seeks to ensure that new buildings and uses enhance the community character and livability with a strong emphasis on design that respects the history of the community and encourages pedestrian activity. To achieve this vision, the Community Plan specifies context sensitive policies for land use by sub-district. The Community Plan recommends mobility and streetscape improvements to enhance the pedestrian environment. Improvements would be consistent with the historic character of the community and would incorporate design features that relate to Old Town San Diego's small-town scale and history.

The Planning Department is also soliciting public input and comments on both draft community plan updates covered in this NOP. These documents can be reviewed on the Planning Department website at:

http://www.sandiego.gov/planning/community/cpu/oldtownmidway/pdf/midway_pacific_highway_c pu_draft.pdf

http://www.sandiego.gov/planning/community/cpu/oldtownmidway/pdf/oldtownsdcpuseptember201 5.pdf

PEIR FORMAT AND CONTENT

A. <u>INTRODUCTION</u>

The introductory chapter of the PEIR should introduce the proposed Community Plan Updates, with a brief discussion on the intended use and purpose of the PEIR. The chapter should identify all discretionary actions/permits associated with the Community Plan Updates. The involvement of other local, state, or federal agencies that have responsibility for approvals or project review should also be described.

B. <u>ENVIRONMENTAL SETTING</u>

The PEIR should describe the general location of each community plan area and present it on a topographic map and regional map. The PEIR shall provide a local and regional description of the environmental setting for each community, as well as the zoning and land use designations of each community, area topography, drainage characteristics, and vegetation. Identify overlay zones and other planning documents that affect each of the communities, such as Airport Approach, Airport Influence Area, FAA Part 77, Residential Tandem Parking overlay zones, and the City of San Diego Multiple Species Conservation Program (MSCP)/Multi-Habitat Planning Area (MHPA), and environmentally sensitive lands such as steep hillsides, wetlands, and the Federal Emergency Management Agency (FEMA) 100 year floodplains or floodways. If a potential cumulative effect for an impact category is to be discussed in the PEIR, this section should establish a setting for the discussion by describing the background or general progression of the cumulative pattern as it relates to each of the Community Plan areas, as well as the Community Plan areas considered as a whole. The environmental setting should include a brief description of police and fire facilities and the emergency response times for each community and the two Community Plan areas when considered as a whole.

C. <u>PROJECT DESCRIPTION</u>

The PEIR should identify the project objectives and include a detailed and separate project description for each of the Community Plan Updates. Project objectives will be critical in determining appropriate alternatives for the project, which would avoid or substantially reduce potentially significant impacts. The project description should provide a discussion of all discretionary actions required for consideration of the Community Plan Updates by City Council, as well as a discussion of all permits and approvals required by federal, state, and other regulatory agencies.

Pursuant to the CEQA Guidelines (Section 15168), a Program EIR allows 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, and allow reduction in paperwork. In addition, it may be used with the intent of streamlining and limiting the later environmental review required for subsequent actions associated with ordinance implementation.

D. <u>HISTORY OF PROJECT CHANGES</u>

This section of the PEIR should outline the history of the project and any material changes that have been made to each of the Community Plan Updates in response to environmental concerns raised during public and agency review of the project (i.e., in response to NOP or public scoping meetings or during the public review period for the Draft PEIR).

E. <u>ENVIRONMENTAL ISSUES</u>

The potential for significant environmental impacts must be thoroughly analyzed and

mitigation measures identified that would avoid or substantially lessen any such significant impacts. The PEIR must represent the independent analysis of the City of San Diego as Lead Agency; therefore, all impact analysis must be based on the City's current "Guidelines for the Determination of Significance". Below are key environmental issue areas that have been identified for discussion in the PEIR, within which the issue statements must be addressed individually. Discussion of each issue statement should include an explanation of the existing conditions, impact analysis, significance determination, and appropriate mitigation. The impact analysis should address potential direct, indirect, and cumulative impacts that could be created through implementation of the proposed project and its alternatives.

Environmental Issue Areas to be Discussed

LAND USE

Issue 1:	Would the project conflict with the environmental goals, objectives, or guidelines of a General Plan or Community Plan or other applicable land use plans?
Issue 2:	Would the project conflict with the provisions of the City's Multiple Species Conservation Program (MSCP) Subarea Plan or other approved local, regional, or state habitat conservation plan?
Issue 3:	Would the proposal result in the exposure of people to noise levels which exceed the City's Noise Ordinance or are incompatible with the Noise Compatibility Guidelines (Table NE-3) in the Noise Element of the General Plan?
Issue 4:	Would the project result in land uses which are not compatible with an adopted Airport Land Use Compatibility Plan (ALUCP)?

The project proposes the update to two community plans located in the central area of the City: Midway-Pacific Highway and Old Town San Diego. The Land Use section should describe land use patterns, the extent of urban development, density and intensity of existing development, and future land use projections based upon the updated Midway-Pacific Highway and Old Town San Diego Community Plans. The relationship of the community plans to the General Plan, and other existing and proposed tools for implementing the General Plan policies should also be addressed. If there are potential inconsistencies of the project with adopted plans, and those inconsistencies would create environmental impacts, this section should describe whether or not these potential impacts would lead to physical significant effects.

The PEIR should analyze each of the proposed Community Plan Updates for consistency with all applicable land use and regulatory plans, including, but not limited to the City of San Diego General Plan (2008), the MSCP Subarea Plan, the SANDAG Sustainable Community Strategy (SCS), and the applicable Local Coastal Program. The relationship of each Community Plan Update with the City's MSCP Subarea Plan should be discussed, and a determination made relative to the potential that the project could conflict with the MSCP. Each Community Plan Update should also be evaluated with regards to applicable Airport Influence Area(s) and

associated ALUCPs. The noise environment shall be considered in each community and a determination made relative to whether implementation of the proposed update would result in exposure of people to noise levels that exceed the City's noise standards and noise compatibility guidelines.

TRANSPORTATION/CIRCULATION

Issue 1:	Would the project result in an increase in projected traffic which is substantial in relation to the existing traffic load and capacity of the street system?
Issue 2:	Would the project result in the addition of a substantial amount of traffic to a congested freeway segment, interchange, or ramp?
Issue 3:	Would the project have a substantial impact upon existing or planned transportation systems?
Issue 4:	Would the project result in substantial alterations to present circulation movements including effects on existing public access to beaches, parks, or other open space areas?
Issue 5:	Would the project conflict with adopted policies, plans or programs supporting alternative transportation modes?

The analysis in this section of the PEIR should identify potential impacts to the traffic and circulation system. A traffic technical study should be prepared in accordance with the City's Traffic Impact Study, be approved by City staff, and included as an appendix to the PEIR.

The traffic study and PEIR should evaluate the traffic volumes and level of service (LOS) on intersections, roadways, and freeway ramps; include descriptions and applicable graphics of the existing transportation conditions within the project area; and provide a comparative analysis of projected conditions during the horizon year. The conclusions of the traffic study should be incorporated into this section of the PEIR. Specifically, this section should address any proposed alterations to the present circulation element and effects on circulation movements within and between each community. The traffic study and PEIR should also address consistency with planned alternative transportation systems and related policies, as well as potential hazards to motor vehicles, pedestrians and bicycles due to the proposed project. Also, this section should address if any proposed land use changes to each Community Plan would result in parking congestion in the community.

VISUAL EFFECTS AND NEIGHBORHOOD CHARACTER

Issue 1:	Would the project result in a substantial obstruction of any vista or scenic view from a public viewing area as identified in the community plan?
Issue 2:	Would the project result in the creation of a negative aesthetic site or project?
Issue 3:	Would the project result in substantial alteration to the existing or planned

character of the area?

- Issue 4: Would the project result in the loss of any distinctive or landmark tree(s), or stand of mature trees as identified in the community plan? (Normally, the removal of non-native trees within a wetland as part of a restoration project would not be considered significant).
 Issue 5: Would the project result in a substantial change in the existing landform?
- *Issue 6:* Would the project create substantial light or glare which would adversely affect daytime or nighttime view in the area?

This section of the PEIR should address visual quality and aesthetics of the project, as well as potential for impacts on neighborhood character, and include a general description of the built and natural visual resources within the Midway-Pacific Highway and Old Town San Diego communities. It should include a discussion of the potential impact of implementation of the Community Plan Updates to any vistas, scenic resources, or community identification symbols or landmarks from any public viewing areas within each community. This section should also address the protection of public views, scenic vistas, and landmarks, and neighborhood character, and how each community plan, through the preparation of neighborhood specific design standards and guidelines, addresses these issues.

Being as a portion of the Midway-Pacific Highway CPU area falls within the Coastal Zone, this section should also provide an analysis of coastal views relative to any proposed land use or zoning changes.

AIR QUALITY

Issue 1:	Would the project conflict with or obstruct implementation of the applicable air quality plan?
Issue 2:	Would the project result in a violation of any air quality standard or contribute substantially to an existing or projected air quality violation?
Issue 3:	Would the project expose sensitive receptors to substantial pollutant concentrations?
Issue 4:	Would the project result in substantial alteration of air movement in the area of the project?

The PEIR shall describe the region's climate and the San Diego Air Basin's current attainment levels for state and federal ambient air quality standards. An Air Quality Analysis shall be prepared for the project. The results of the Air Quality Analysis shall be presented in this section of the PEIR, and included as an appendix to the PEIR. The air quality study will identify potential stationary sources of air emissions within each of the planning area and shall discuss if implementation of the proposed Community Plan Updates would impact the ability of the San Diego Air Basin to meet regional air quality strategies and the consistency of the project with the California Air Resources Board Air Quality and Land Use Handbook. The significance of potential air quality impacts shall be assessed and control strategies identified. The PEIR shall analyze the Community Plan Updates' compliance with the State Implementation Plan (SIP), the Regional Transportation Plan (RTP) and the Regional Transportation Improvement Plan (RTIP).

The PEIR shall also assess the potential health risks associated with diesel particulate emissions from vehicular traffic on the area freeways, including Interstates 5 and 8, as well as State Route 163 near the planning areas, and shall assess whether the proposed land use plans and policies in the Community Plan Updates would allow for future development which would create a significant adverse effect on air quality that could affect public health. The PEIR shall assess whether project implementation would result in a significant increase in auto and truck emissions due to an overall increase in vehicular trips within each of the communities and the two community plan areas as a whole.

GREENHOUSE GAS EMISSIONS

- *Issue 1:* Would the project generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?
- *Issue 2:* Would the project conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing emissions of greenhouse gases?

The EIR shall provide a description of the existing global context in which climate change impacts are occurring and are expected to occur in the future; a summarization of the relevant state laws that address climate change; a description of relevant statewide and/or regional GHG inventories to which the project would contribute; a quantification of the project's direct and indirect GHG emissions and compare them to baseline conditions; a conversion of the GHG into C02 equivalents using an established "carbon calculator"; a discussion of whether the project would enhance or impede the attainment of state GHG reduction targets and its relationship to local plans and policies; a description of the cumulative, global climate change impacts to which the project would contribute; and a description of how the impacts of global climate change could impact the project.

Furthermore, an estimate of the project generated greenhouse gas emissions shall be provided in this section. The projected greenhouse gas emissions with and without the Community Plan Updates shall be compared and incorporated into a qualitative discussion of the significance of the emissions relative to global climate change. A qualitative discussion of potential adverse effects to the project that may occur because of global climate change shall also be included in this section.

The PEIR shall provide details of community specific policies that pertain to sustainable land use and site planning and sustainable design and building features, and any other policies that meet criteria outlined in the Conservation Element of the General Plan.

ENERGY

Issue 1:	Would the construction and operation of the project result in the use of excessive amounts of electrical power?
Issue 2:	Would the project result in the use of excessive amounts of fuel or other forms of energy (including natural gas, oil, etc.)?

Appendix F of the State CEQA Guidelines requires that potentially significant energy implications of a project shall be considered in an EIR to the extent relevant and applicable to the project. Particular emphasis on avoiding or reducing inefficient, wasteful, and unnecessary consumption of energy should be included in this section. The EIR section shall address the estimated energy use for the project and assess whether the project would generate a demand for energy (electricity and/or natural gas) that would exceed the planned capacity of the energy suppliers. A description of any energy and/or water saving project features should also be included in this section. (Cross-reference with GHG Emissions discussion section as appropriate.) Describe any proposed measures included as part of the project or required as mitigation measures directed at conserving energy and reducing energy consumption. Ensure this section addresses all issues described within Appendix F of the CEQA Guidelines.

NOISE

Issue 1:	Would the project result in or create a significant increase in the existing ambient noise levels?
Issue 2:	Would the project cause exposure of people to current or future transportation noise levels which exceed standards established in the Transportation Element of the General Plan?

A Noise Technical Report shall be prepared, which shall consist of a comparison of the change in noise levels projected along affected roadways (as identified in the traffic study) resulting from project implementation. The Noise Technical Report shall be included in the appendices to the PEIR. This analysis and the discussion in the PEIR shall focus on areas that would be subject to potentially significant noise impacts as a result of the proposed Community Plan Updates and shall include discussion of potential measures that could be utilized to reduce vehicular noise levels. The Noise Technical report and PEIR shall also assess potential noise impacts related to aircraft over flight operations for each community.

HISTORICAL RESOURCES

- Issue 1: Would the project result in an alteration, including the adverse physical or aesthetic effects and/or the destruction of a prehistoric or historic building (including an architecturally significant building), structure, object, or site?
- Issue 2: Would the project cause a substantial adverse change in the significance of a tribal cultural resource as defined in Public Resources Code 21074?

Issue 3:	Would implementation of the project result in any impact to existing religious or sacred uses within the CPU areas?
Issue 4:	Would implementation of the project result in the disturbance of any human remains, including those interred outside of formal cemeteries?

Both communities have played an important role in the City's history and development, and important historical resources remain today in both communities. A historical resources evaluation has already been prepared which identifies impacts to historical resources within each community that could result with implementation of the Community Plan Updates. This section of the PEIR shall incorporate information from both the archaeological and historical reports and describe whether or not implementation of the Community Plan Updates would negatively affect the preservation of archaeological or historical resources within the respective communities. This section of the PEIR should also describe how the policies of the Historic Preservation Element would reduce any potential impacts to historical resources.

BIOLOGICAL RESOURCES

Issue 1:	Would the project result in a substantial adverse impact, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in the MSCP or other local or regional plans, policies or regulations, or by the California Department of Fish and Wildlife (CDFW) or US. Fish and Wildlife Service (USFWS)?
Issue 2:	Would the project result in a substantial adverse impact either directly or through habitat modifications (including Tier I, II, IIIA, or IIIB Habitats as identified in the Biology Guidelines of the Land Development manual), on any species identified as a candidate, sensitive, or special status species in the Multiple Species Conservation Program (MSCP) or other local or regional plans, policies or regulations, or by the California Department of Fish and Wildlife (CDFW) or U.S. Fish and Wildlife Service (USFWS)?
Issue 3:	Would the project 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?
Issue 4:	Would the project interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, including linkages identified in the MSCP Plan, or impede the use of native wildlife nursery sites?
Issue 5:	Would the project result 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?
Issue 6:	Would the project introduce land uses within an area adjacent to the MHPA

that would result in adverse edge effects?

A programmatic level general biological analysis (Biological Resources Technical Report) shall be prepared for the project to include an evaluation of biological resources within each community that could be potential affected by the respective Community Plan Updates. The Biological Resources Technical Report shall be included in the appendices to the PEIR. Existing documents and recent aerial imagery shall be reviewed to document biological resources within the three community plan areas. Sensitive biological resources will be plotted on the base map based on literature review and the types of suitable habitat present in the community planning areas.

The PEIR shall evaluate each proposed community plan update and identify any potential impacts which could occur with respect to sensitive biological resources from its implementation including direct and indirect impacts, and the proposed revisions to the open space boundary in each planning area based upon updated open space mapping.

Potential indirect impacts to biological resources shall be addressed and appropriate mitigation measures shall be included in this section. The analysis shall identify federal, state, and local ordinances and laws which protect sensitive biological resources (e.g., City MSCP, State NCCP, and state and federal endangered species and wetlands laws). The potential for development pursuant to the proposed Community Plan Updates to conflict with the goals and regulations established by these laws and policies shall also be evaluated.

Also, this section shall discuss how any proposed land use changes associated with the Community Plan Updates would impact the City's biological conservation goals either directly or indirectly, and describe how the Conservation Element included within each Community Plan Update would affect those goals.

GEOLOGIC CONDITIONS

Issue 1:	Would the project expose people or structures to geologic hazards such as earthquakes, landslides, mudslides, ground failure, or similar hazards?
Issue 2:	Would the project result in a substantial increase in wind or water erosion of soils, either on or off the site?
Issue 3:	Would the project be located on a geologic unit or soil that is unstable or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction or collapse?

The analysis in the PEIR shall be based on a review of available reports and maps and preparation of a geologic map that shows potential geologic hazard areas (faults, landslides) and areas where known adverse soil conditions have been found for each community. This section of the PEIR shall include a summary of the geologic hazards and soil conditions for each community.

The PEIR shall discuss the potential for either short- or long-term erosion impacts to soils on-

site. Geological constraints on the project site, including ground shaking, ground failure, landslides, erosion, and geologic instability shall be addressed, as well as seismicity and seismic hazards created by faults present in the project site.

PALEONTOLOGICAL RESOURCES

Issue 1: Would the project require over 1,000 cubic yards of excavation in a high resource potential geologic deposit/formation/rock unit?

Issue 2: Would the project require over 2,000 cubic yards of excavation in a moderate resource potential geologic deposit/formation/rock unit?

The PEIR shall include a paleontological resources discussion that identifies the underlying soils and formations within each community and the likelihood of the project to uncover paleontological resources during grading activities. Standard mitigation measures shall be outlined in the PEIR to ensure that, should important resources be uncovered with implementation of future development projects within the communities, appropriate measures would be required to allow for recovery and curation.

HYDROLOGY/WATER QUALITY

Issue 1:	Would the project result in a substantial increase in impervious surfaces and associated increased runoff?
Issue 2:	Would the project result in substantial alteration to on- and off-site drainage patterns due to changes in runoff flow rates or volumes?
Issue 3:	Would the project result in an increase in pollutant discharge to receiving waters during construction or operation?
Issue 4:	Would the project violate any water quality standards or waste discharge requirements?

HYDROLOGY

Hydrology deals with the properties, distribution, and circulation of surface water, ground water, and atmospheric water. The quantity of water which flows in a creek or river is calculated based on historic climatic conditions combined with the watershed characteristics. The slope and shape of the watershed, soil properties, recharge area, and relief features are all watershed characteristics that influence the quantity of surface flows. Therefore, as land is developed, impervious area is increased, thereby increasing runoff.

The PEIR shall evaluate if the proposed plan update for each community would have a potential for increasing runoff volumes within affected watersheds. Anticipated changes to existing drainage patterns and runoff volumes for each community shall be addressed in the PEIR. A preliminary hydrology study must be provided and measures to protect on-site and downstream properties from increased erosion or siltation must be identified; this study shall be included in the

appendices of the PEIR. The PEIR should address the potential for project implementation to impact the hydrologic conditions within the project area, and downstream.

WATER QUALITY

Water quality is affected by sedimentation caused by erosion, by runoff carrying contaminants, and by direct discharge of pollutants (point-source pollution). As land is developed, the impervious surfaces send an increased volume of runoff containing oils, heavy metals, pesticides, fertilizers, and other contaminants (non-point source pollution) into adjacent watersheds.

Degradation of water quality could impact human health as well as wildlife systems. Sedimentation can cause impediments to stream flow. In addition, oxygen availability is affected by sedimentation, which can significantly influence aquatic and riparian habitats. Therefore, the PEIR shall discuss how the each Community Plan's update could affect water quality within the project area and downstream.

This section shall also identify pollutants of concern for the watershed(s) in which each community is located. Based upon the federal Clean Water Act (CWA) Section 303(d) impaired water listings, this section shall address potential impacts to the beneficial uses, and address if the project would cause impacts to water quality. Conformance with the National Pollutant Discharge Elimination System (NPDES) requirements shall also be discussed.

PUBLIC SERVICES AND FACILITIES

Issue 1: Would the proposal have an effect upon, or result in a need for new or altered governmental services in any of the following areas: police protection, parks or other recreational facilities, fire/life safety protection, libraries, schools, and maintenance of public facilities, including roads?

The PEIR shall include a discussion of potential impacts to public utilities resulting from implementation of each Community Plan Update. The PEIR shall identify any conflicts with existing infrastructure, evaluate any need for upgrading infrastructure, and shall demonstrate that facilities would have sufficient capacity to serve the needs of the project. This section shall discuss any intensification of land use and land use changes associated with each Community Plan Update to determine if it would increase demand on existing and planned public services and facilities, and identify fire and police facilities in each community. This section will also disclose the Fire and Police Departments' current response time to the area, and discuss if project implementation of the proposed Community Plan Update for each community would alter any existing or planned response times within the project or surrounding service area.

PUBLIC UTILITIES

Issue 1: Would the project result in a need for new systems, or require substantial alterations to existing utilities, the construction of which would create physical impacts with regard to the following utilities: natural gas, water, sewer, communication systems, and solid waste disposal?

Issue 2: Would the project result in the use of excessive amounts of water?

The PEIR shall describe measures/policies included within the proposed Community Plan updates that could potentially reduce the use of energy and water. The PEIR will present measures included as part of the policies and/or proposals within each Community Plan Update or proposed as mitigation measures directed at conserving energy and reducing energy consumption consistent. The PEIR shall discuss how the implementation of the Community Plan Updates would affect the City's ability to handle solid waste.

The PEIR shall also provide a discussion of water supply and whether project build-out under each of the proposed Community Plan Updates was considered in the 2015 Urban Water Management Plan; an identification of water usage and customers served in each community, including commercial and residential usage; a determination of the water supply necessary to serve the demand of both short-term and long-term build-out; an identification of reasonably foreseeable short-term and long-term water supply sources, and alternative sources which would include anticipated dates of previously untapped sources becoming available; an identification of likely yields of future water supply from short-term and long term build-out; consultation with water supply agencies to determine discrepancies between actual ability and projected ability to serve the project; a determination of cumulative demands the project would place on projected water supply; a comparison demand of project build-out with projected water supply from both shortterm and long-term water sources and disclose impacts; consultation with water supply agencies to determine discrepancies between actual ability and projected ability to serve the project; a determination of cumulative demands the project would place on projected water supply; and a comparison of demand of project build out with projected water supply from both short-term and long-term water sources with disclosure of deficits.

HEALTH AND SAFETY

- *Issue 1:* Would the project 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?
- *Issue 2:* Would the project result in hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within a quarter-mile of an existing or proposed school?
- *Issue 3:* Would the project impair implementation of, or physically interfere with an adopted emergency response plan or emergency evacuation plan?
- Issue 4: Would the project be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, create a significant hazard to the public or environment?
- *Issue 5:* Would the project result in a safety hazard for people residing or working in a designated airport influence area?

The PEIR shall identify known contamination sites within each of the Community Plan areas and

address any potential impacts that identified contamination site could have on land uses of the proposed Community Plan Updates. The PEIR shall also discuss effects on emergency routes and access within each community resulting from the proposed Community Plan Updates. Fire hazards exist where highly flammable vegetation is located in canyon areas located in the community plan update areas. Specialized public safety issues arise in cases where brush management requirements cannot be met. The PEIR shall discuss the provisions provided in each Community Plan Update in terms of health and safety related to fire hazards in and adjacent to each community. The analysis in this section shall also include a discussion of the City's brush management requirements, as well as any other safety measure(s) proposed as part of the project.

Conduct a research of data bases (such as the State of California Hazardous Waste and Substances Sites List and Environfacts) to determine if hazardous materials, toxic substances, and/or toxic soils are known to occur in the communities. Graphics will be used to identify the location of any potential hazardous materials and sources. Additionally, evaluate potential issues associated with proximity to any areas identified as Prime Industrial Lands in the City's General Plan. If potential impacts are identified, a mitigation strategy shall be proposed.

POPULATION AND HOUSING

Issue 1:	Would the project displace substantial numbers of existing housing or people,
	necessitating the construction of replacement housing elsewhere?

Issue 2: Would implementation of the project induce substantial population growth in the area, either directly or indirectly?

The PEIR shall identify any increases in population within the community that may result from the revised land use designations associated with the proposed Community Plan Updates. It shall also discuss the potential for implementation of the Community Plan Updates to displace substantial numbers of people or housing and discuss ways to reduce displacement should it be determined to occur. The PEIR shall also evaluate whether the community plan would induce growth (e.g. creation of new roads or utilities needed to accommodate additional growth in the community).

F. <u>SIGNIFICANT ENVIRONMENTAL EFFECTS WHICH CANNOT BE AVOIDED IF</u> <u>THE PROPOSED PROJECT IS IMPLEMENTED</u>

This section shall describe the significant unavoidable impacts of the project, including those significant impacts that can be mitigated but not reduced to below a level of significance.

G. SIGNIFICANT IRREVERSIBLE ENVIRONMENTAL CHANGES

In conformance with CEQA Section 15126.2(b) and (c), the PEIR must include a discussion on any significant irreversible environmental changes which could be caused by the project should it be implemented. The PEIR shall address the use of nonrenewable resources during the construction and life of the project.

H. <u>GROWTH INDUCEMENT</u>

Consistent with CEQA Guidelines Section 15126.2, the PEIR shall address the potential for growth inducement resulting from implementation of the proposed project. The PEIR shall discuss the ways in which the proposed project could foster economic or population growth, or construction of additional housing either directly or indirectly. Accelerated growth could further strain existing community facilities or encourage activities that could significantly affect the environment.

This section shall address ways in which the proposed Community Plan Updates could foster economic or population growth, or construction of additional housing, either directly or indirectly as a result of implementation of the Community Plan Updates. Additionally, this section shall discuss if the project would result in accelerated growth that may further strain existing community facilities or encourage activities that could significantly affect the environment. The consequences of growth shall be evaluated, as well as the potential for impacts to occur in surrounding areas as a result of project implementation.

I. <u>CUMULATIVE IMPACTS</u>

When the proposed project is considered with other past, present, and reasonably foreseeable projects in the project area, implementation could result in significant environmental changes that are individually limited but *cumulatively considerable*. Therefore, in accordance with Section 15130 of the CEQA Guidelines, potential cumulative impacts shall be discussed in a separate section of the EIR. The PEIR shall summarize the overall short-term and long-term impacts the proposed project could have in relation to other planned and proposed projects in the project area.

J. EFFECTS FOUND NOT TO BE SIGNIFICANT

A separate section of the PEIR shall include a brief discussion of why certain areas were not considered to be potentially significant and were therefore not included in the PEIR. For the Midway-Pacific Highway and Old Town San Diego Community Plan Updates Project, these include agricultural and forestry resources and mineral resources. It is possible that other issue areas will be included in this section based upon the results of technical analyses not completed as of the publication of the NOP. Additionally, as supplementary information is submitted, the PEIR may need to be expanded to include additional areas. Consultation with EAS is recommended to determine if subsequent issue area discussions need to be added to the PEIR. The justification for these findings will be summarized in the PEIR.

K. <u>ALTERNATIVES</u>

In accordance with CEQA Guidelines Section 15126.6, the EIR shall focus on reasonable alternatives that avoid or reduce the project's significant environmental impacts. These alternatives shall be identified and discussed in detail, and shall address all significant impacts.

The alternatives analysis shall be conducted in sufficient graphic and narrative detail to

clearly assess the relative level of impacts and feasibility. Preceding the detailed alternatives analysis shall be a section entitled "Alternatives Considered but Rejected." This section shall include a discussion of preliminary alternatives that were considered but not analyzed in detail. The reason for rejection shall be explained.

No Project Alternative – Adopted Community Plans

The No Project Alternative discussion shall compare the environmental effects of approving the project with impacts of not approving the project. In accordance with CEQA Guidelines Section 15126.6(e)(3)(B), the No Project Alternative shall discuss the existing conditions at the time of the NOP, as well as what would be reasonably expected to occur in the foreseeable future if the proposed project is not approved, based on current zoning, land use designations, and available infrastructure. The No Project/Development under Existing Community Plans alternative assumes no updates to the existing community plans, with future development occurring consistent with these existing plans. The intent of this alternative is to satisfy CEQA's requirement to address development of the project in accordance with any approved plans or existing zoning. *Other Project Alternatives*

In addition to a No Project Alternative, the PEIR shall consider other alternatives that are determined through the environmental review process that would mitigate potentially significant environmental impacts. These alternatives must be discussed with EAS staff prior to including them in the PEIR.

The Alternatives section of the PEIR will be based on a description of "reasonable" project alternatives, defined in consultation with City staff consistent with CEQA, which reduce or avoid potentially significant impacts associated with the proposed project. Site-specific alternatives, if needed, will be developed in response to the findings of the environmental analyses and the various technical studies and may include alternative project design to mitigate one or more of the identified significant adverse impacts of the proposed project. This may include a reduction in land use intensity, alternative land use plan(s) or feasible design scenarios.

Land use plan(s) and/or concepts that were identified and rejected for detailed evaluation in the PEIR will be presented, with a clear reason as to why those alternatives are not being considered in the PEIR. The advantages and disadvantages of each alternative will be compared to the proposed project and reasons for rejecting or recommending the alternative will be discussed in the PEIR.

L. MITIGATION MONITORING AND REPORTING PROGRAM (MMRP)

For each of the issue areas discussed above, mitigation measures shall be clearly identified, discussed, and their effectiveness assessed in each issue section of the EIR. A Mitigation Monitoring and Reporting Program (MMRP) for each mitigation measure must be included. At a minimum, the program should identify: 1) the city department or other entity responsible for the monitoring; 2) the monitoring and reporting schedule; and 3) the completion requirements. The separate MMRP should also be contained (verbatim) as a

separate section within the EIR.

M. <u>OTHER</u>

The EIR shall include the references, individuals and agencies consulted, and certification page.

If you have any questions or need clarification regarding any of the information contained in the scoping letter, please contact Susan Morrison at (619) 533-6492 or e-mail at <u>simorrison@sandiego.gov.</u>