



THE CITY OF SAN DIEGO

April 6, 2009

Mr. Bill Anderson, Director
City of San Diego
City Planning and Community Investment Department
202 C Street, MS 5A
San Diego CA, 92101

Dear Mr. Anderson:

SUBJECT: Scope of Work for a Draft Program Environmental Impact Report for the San Diego River Park Master Plan ("Project"). Project No. 121886

The Environmental Analysis Section (EAS) of the City of San Diego Development Services Department has conducted an initial study for the San Diego River Park Master Plan (Master Plan) Project. The Project would require City Council approval (Process 5) of the San Diego River Park Master Plan (Master Plan); General Plan Amendment and Community Plan Amendments for Mission Valley, Navajo, Tierrasanta, and East Elliot; Amendments to the Municipal Code – Mission Valley Planned District, Community Plan Implementation Overlay Zone, Mission Trails Design District.

Project Description

San Diego River Park Master Plan

The Draft Master Plan contains four major sections: Principles, Recommendations, Design Guidelines and Implementation. The Principles are the overarching goals. The Recommendations describe specific strategies for achieving the intent of the Principles. The Recommendations are further divided into the six reaches of the river that have unique characteristics and opportunities; Estuary; Lower Valley; Upper Valley; Gorge; and Plateau. The Design Guidelines provide guidance on the implementation of the specific elements within the two areas of the Master Plan, the River Corridor and River Influence. The River Corridor consists of the river channel including the floodway as well as development buffers intended to protect the water quality, hydrology and biological resources habitat adjacent to the River. Specifically, the River Corridor would include the existing 100-year floodway (as mapped by FEMA) plus 35 feet on either side of the floodway a minimum of 135 feet on both sides of the River as measured from the high water line. Uses allowed in the River Corridor would be limited to passive recreation facilities identified in the Master Plan. The River Influence is the first 200' from the River Corridor on both sides of the San Diego River. Properties excluded from this are Mission Trails Regional Park and properties within previously-approved Specific Plan(s). The Development Standards for the River Corridor and River Influence areas address site planning,



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architecture, and landscape architecture features. The Implementation section describes the method for implementing the Master Plan.

Amendment to the General Plan

A General Plan Amendment is proposed to add the San Diego River Park as an official resource-based park in the Open Space Lands and Resource-Based Parks section of the General Plan Recreation Element.

Amendments to the Community Plans

Community Plan Amendments are proposed for Mission Valley, Navajo, Tierrasanta, and East Elliot. Within the Mission Valley Community Plan the Master Plan will be identified as the policy document for development within and adjacent to the River. The San Diego River element of the community plan will be amended to reflect the principles of the Master Plan. The Open Space Element of the Mission Valley Community Plan will also be amended to add the San Diego River Park as a resource-based park.

The Navajo Community Plan will be amended to identify the Master Plan as the policy document for development within and adjacent to the San Diego River. Changes to existing policies and supplemental development regulations will be amended to reflect the principles of the Master Plan. The community plan will also be amended to include a new San Diego River Park CPIOZ Type B within the existing Navajo CPIOZ that will establish supplemental Development Standards that will implement the principles of the Master Plan. The Open Space Element of the Navajo Community Plan will also be amended to add the San Diego River Park as a resource-based park.

CPIOZ Type B within the Navajo Community Planning area will cover private and public projects proposed for the River Corridor and River Influence areas. The CPIOZ Type B requires a discretionary review of proposed development.

Within the Tierrasanta and East Elliot Community Plans the Master Plan will be identified as the policy document for development within and adjacent to the River. Existing policy language related to the San Diego River will be amended to reflect the Master Plan. The plan amendments will also reference the Mission Trails Design District Overlay Zone as the implementing tool of the Master Plan. In addition the Community Plans will be amended to add the San Diego River Park as a resource-based park within the Open Space section of the Plans.

Community Plan Amendments for Ocean Beach, Mission Beach, Midway Pacific and Linda Vista will be made in the future during the Community Plan update process for these communities including amendments to the certified Local Coastal Programs, where applicable. The San Diego River Park will be added to the Open Space Element of each plan as a resource based park and will identify the Master Plan as the policy document for development within and adjacent to the River.

Amendments to the City of San Diego Municipal Code - Mission Valley Planned District

Amendments to Chapter 15 of the City of San Diego Municipal Code; Mission Valley Planned District Ordinance (Mission Valley PDO) is required to revise the current language that is in conflict with the goals of the Master Plan and add new implementation language. The Permit Application, Review and Issuance section of the Mission Valley PDO will be amended to require all proposed private and public projects within the River Corridor or River Influence area to be a discretionary Mission Valley Development Permit. The San Diego River Sub district will be amended to provide the River Corridor and River Influence boundaries and development standards.

Amendments to the City of San Diego Municipal Code - Community Plan Implementation Overlay Zone

Chapter 13 of the Municipal Code, Community Plan Implementation Overlay Zone, will be amended to provide a new map of Navajo showing the boundaries of the San Diego River Park CPIOZ Type B.

Amendments to the City of San Diego Municipal Code – Overlay Zones for the Mission Trails Design District

Chapter 13 of the Municipal Code, Overlay Zones for the Mission Trails Design District will be amended to revise the current language that is in conflict with the goals of the Master Plan, add new implementation language, and to require a discretionary permit for all proposed exterior private and public projects within the River Corridor or River Influence area. The Mission Trails Design District Manual will also be amended to revise current language that is in conflict with the goals of the Master Plan and add new implementation language. In addition the Master Plan will be identified as the Policy Document for all development within and adjacent to the River.

Projects within the Scope of the PEIR

Another purpose of this or any other PEIR is to streamline environmental review of projects found to fall within the scope of the PEIR. The PEIR for this Project would address the Master Plan Recommendations, amendments to the Community Plans and amendments to the Municipal Code at a general programmatic level. The PEIR will not evaluate project level impacts associated with future implementation of any of the Master Plan recommendations or any public or private development projects proposed within the San Diego River Park. The PEIR will also not address impacts of specific projects on individual County Assessor's Parcels. Any subsequent activities proposed within the San Diego River Park will be reviewed for consistency with the PEIR and Master Plan. However, any project level impacts of these subsequent activities would be subject to separate environmental review under CEQA.

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PEIR Scope and Results of Initial Study

Based on the results of the Initial Study pursuant to the California Environmental Quality Act (CEQA) of 1970, Section 15063(a) and 15081, as amended, it has been determined that the proposed project may have a significant effect on the environment. The preparation of a draft Program Environmental Impact Report (PEIR) is, therefore, required. The purpose of this letter is to identify the issues to be specifically addressed in the PEIR. The PEIR should be prepared in accordance with the City's Environmental Impact Report Guidelines, (December 2005), a copy of which is attached for your use. A Notice of Preparation (NOP) will be distributed to Responsible Agencies and others who may have an interest in the project, and consequently, changes or additions to this scope of work may be required because of input received in response to the NOP.

I. PROJECT DESCRIPTION

The Draft Program EIR should include a detailed discussion of the goals and objectives of the proposed project. Project objectives will be critical in determining the appropriate alternatives for the project, which would avoid or substantially reduce potentially significant impacts. This section of the document should include a discussion of all discretionary actions required for Project approval and implementation, including but not limited to a description of all permits and approvals required by local, state, federal, and other regulatory agencies.

For purposes of this analysis the area covered by the Proposed Project includes the River Corridor Area and River Influence Area delineated by the San Diego River Park Master Plan. The general plan amendment, community plan amendments, and amendments to the Municipal Code resulting from implementation of the San Diego River Park Master Plan and the project features would also be addressed in the PEIR.

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 projects that implement the Draft Master Plan.

II. ENVIRONMENTAL SETTING

The Draft Program EIR should (i) describe the precise location of the Project and present it on a detailed topographic map and regional map; (ii) provide a local and regional description of the environmental setting of the project, as well as adjacent land uses, area topography, drainage characteristics and vegetation; and (iii) include any applicable land use plans/overlay zones that affect the Project site, such as the City of San Diego Multiple Species Conservation Program (MSCP) Subarea Plan, associated Multi-Habitat Planning Area and FEMA 100 year floodway zone.

III. ENVIRONMENTAL ISSUES

The potential for significant environmental impacts must be thoroughly analyzed and mitigation measures identified that would avoid or substantially lessen any such significant impacts. Below are key environmental issue areas that have been identified for this Project, within which the issue statements must be addressed individually. Discussion of each issue statement should include an explanation of the existing Project site 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.

LAND USE

- Issue 1: Would the proposed Master Plan result in a conflict with the goals, objectives, and recommendations of the City of San Diego General Plan (General Plan), the City of San Diego Municipal Code, or the Mission Valley, Navajo, Tierrasanta, and East Elliot Community Plans? How is the proposed Master Plan consistent with the land use designation, intensity of development, and environmental goals of these plans?**
- Issue 2: Would implementation of the proposed Master Plan be consistent with the density calculations, design standards, use restrictions and any other development regulations of the City's Land Development Code related to the applicable zoning regulations.**
- Issue 3: Would the proposed Master Plan result in a conflict with adopted environmental plans, including the City of San Diego's Multiple Species Conservation Program (MSCP) Subarea Plan and the Multi Habitat**

Planning Area (MHPA) adopted for the purpose of avoiding or mitigating an environmental effect for the area?

The PEIR should evaluate how the Master Plan accomplishes or fails to implement the goals, objectives, and recommendations of the General Plan, San Diego Municipal Code, San Diego's City's Land Development Code or relevant community plans. If any inconsistencies are identified, the Land Use Section of this PEIR should also identify if these inconsistencies warrant an environmental impact. The PEIR should also address the land use compatibility with final MSCP Plan (August 1998), and the City's MSCP Subarea Plan (March 1997). A description of measures proposed to reduce any identified MHPA adverse edge effects should be included within this section as well.

VISUAL EFFECTS AND NEIGHBORHOOD CHARACTER

- Issue 1: Would the proposed Master Plan result in a substantial change to natural topography or other ground surface relief features?**
- Issue 2: Would implementation of the proposed Master Plan result in the blockage of public views from designated open space areas, roads, or to any significant visual landmarks or scenic vistas?**
- Issue 3: Would the proposed Master Plan affect the existing visual character of the City or community plan areas, particularly with respect to views from major roadways, public viewing areas, vistas, or open spaces?**
- Issue 4: Would the proposed Master Plan be compatible with surrounding development in terms of bulk, scale, materials, or style?**
- Issue 5: Would the proposed Master Plan's land use changes cumulatively cause "extensive" view blockage (i.e. overall scenic quality is changed from natural view to man-made appearance)?**

To the extent feasible, the PEIR should include an evaluation of potential for impacts on the natural landforms within the planning area resulting from the land use and circulation element changes. The PEIR should also describe how each of the community characters within the project area that would be affected with implementation of the proposed Master Plan. Would the Master Plan result in homogenous style of architecture over the City or would varied architectural designs be encouraged? The City's Significance Determination Guidelines include the following in determining such impacts: exceeds the allowed height or bulk regulations and existing patterns of development in the surrounding area by a significant margin; and/or located in a highly visible area and would strongly contrast with the surrounding development or natural topography through excessive bulk, signage, or architectural projection. This section of the PEIR should, therefore, include a conceptual description and analysis of the allowed building mass, bulk, height, and architectural style that could result from the proposed Master Plan.

AIR QUALITY/ODOR

Issue 1: Would implementation of the proposed Master Plan result in an increased number of automobile trips which could potentially affect San Diego's ability to meet regional, state and federal clean air standards?

Issue 2: Would implementation of the proposed Master Plan result in air emissions that would substantially deteriorate ambient air quality, including the exposure of sensitive receptors to substantial pollutant concentrations?

The PEIR should describe the Master Plan area's climatological setting within the San Diego Air Basin and the basin's current attainment levels for State and Federal Ambient Air Quality Standards (AAQS). It should discuss both the potential stationary and non-stationary air emission sources related to the land use modifications associated with the proposed Master Plan and particularly vehicle emission sources. Should the proposed Master Plan result in a significant decrease in the levels-of-service of any roadway or intersection, the PEIR should address the potential degradation of air quality which may result, including the possibility of "hotspots" within the area. While only a guideline and not a rule or regulation, the PEIR should also discuss consistency with the California Air Resources Board Air Quality and Land Use Handbook.

The PEIR will include a qualitative description of potential impacts to air quality and compliance with AAQS associated with subsequent activities that implement the draft Master Plan. However, a quantified analysis future project impacts to air quality would not be addressed in the PEIR and future project level impacts would be subject to subsequent environmental review under CEQA.

Although air quality impacts are not anticipated for this project, the PEIR should discuss the proposed Master Plan's impact on the ability of the San Diego Air Basin to meet regional air quality strategies (RAQS). It should discuss any short, long-term, and cumulative impacts the project may have on regional air quality, including construction and transportation-related sources of air pollutants, and the potential impacts from the increase in vehicle trips to the RAQS, the overall air quality impacts from such trips, and any proposed mitigation measures. The section should also address any affects of the Master Plan related to climate change and greenhouse gas emissions.

BIOLOGICAL RESOURCES

Issue 1: Would implementation of the proposed Master Plan result in a reduction in the number of any unique, rare, endangered, sensitive, or fully protected species of plants or animals?

Issue 2: Would the proposed Master Plan result in interference with the nesting/foraging/movement of any resident or migratory fish or wildlife species?

- Issue 3: Would the proposed Master Plan result in an impact to a sensitive habitat, including, but not limited to streamside vegetation, oak woodland, vernal pools, wetland, coastal sage scrub, or chaparral?**
- Issue 4: Would the proposed Master Plan affect the long-term conservation of biological resources as described in the MSCP? Would the proposed Master Plan meet the objectives of the MSCP's Land Use Adjacency Guidelines or conflict with the provisions of the City's MSCP, Subarea Plan or other approved local, regional, or state conservation plans?**
- Issue 5: Would the proposed Master Plan result in the introduction of invasive species of plants into the area?**
- Issue 6: Would the proposed Master Plan result in an impact on City, State, or Federally regulated wetlands (including but not limited to, salt marsh, vernal pool, lagoon, riparian habitat, etc.) through direct removal, filling, hydrological interruption or other means?**

A series of diverse habitats would potentially be directly or indirectly affected by the proposed Master Plan, and to the extent feasible, should be fully discussed in this section of the PEIR. A biological resources constraints analysis, based on existing inventory of biological resources information already assembled for the draft Master Plan, should be prepared to address existing conditions, potential constraints, and opportunities related to biological resources within the project study area. The analysis should also include limited site reconnaissance as necessary to accurately represent the existing conditions discussion of the PEIR. The analysis must also identify, based on the draft Master Plan documentation, any MSCP covered and narrow endemic flora and fauna, which are known to be or to have a potential to exist in the Master Plan area.

The impacts to identifiable wetland habitat should be addressed within this section of the PEIR. Wetland habitat types should be shown graphically and include recommendations to sustain their functionality based on the development standards proposed for the River Corridor and River Influence areas. If impacts to any wetlands or wetlands buffers are identified, a discussion of the infeasibility of avoiding such impacts with the Master Plan should be included.

Encroachment into the City's MHPA would occur with the proposed Master Plan. Both the biological constraints analysis and the Biological Resources section of the PEIR should disclose potential MHPA boundary adjustments or corrections that may be required with implementation of subsequent activities that implement the draft Master Plan. However, detailed descriptions of the MHPA boundary adjustments and the functional equivalence analysis required for future projects would not be addressed in the PEIR. Any MHPA

boundary adjustments associated with development of projects that implement the draft Master Plan would be subject to subsequent environmental review.

HISTORICAL RESOURCES

- Issue 1: Would the proposed Master Plan result in the alteration or destruction of a prehistoric or historic archaeological site?**
- Issue 2: Would the proposed Master Plan result in any adverse physical or aesthetic effects to a prehistoric or historic building, structure, object, or site?**
- Issue 3: Would the proposed Master Plan result in any impact to existing religious or sacred uses within the potential impact area?**
- Issue 4: Would the proposed Master Plan result in the disturbance of any human remains, including those interred outside of formal cemeteries?**

The proposed Master Plan area contains numerous archaeological sites. A cultural resources constraints analysis, based on existing inventory of historical and cultural resources information already assembled for the draft Master Plan, should be prepared for the proposed project to address existing conditions, potential constraints and opportunities related to cultural and historic resources within the project area. The analysis should include the records search of local databases as well as site reconnaissance as necessary to verify locations of cultural resources sites identified in the records research. If appropriate, the PEIR should identify requirements for when archaeological mitigation would be required. Although the Master Plan will not result in direct impacts, the PEIR should discuss cumulative impacts relative to the loss of paleontological resources.

A Sacred Lands File Search should also be conducted by the Native American Heritage Commission for this project, as well as Native American consultation in accordance with Senate Bill 18.

HUMAN HEALTH/PUBLIC SAFETY/HAZARDOUS MATERIALS

- Issue 1: Would the proposed land use changes and circulation element revisions in the proposed Master expose people or property to health hazards, including fire?**
- Issue 2: Would the proposed Master Plan create a future risk of an explosion or the release of hazardous substances (including, but not limited to gas, oil, pesticides, chemicals, or radiation)? Would the proposed Master Plan expose people or the environment to a significant hazard through the routine transport, use, or disposal of hazardous materials?**

Issue 3: Would the proposed Master Plan's uses be located on a site which is included on a list of hazardous materials sites compiles pursuant to Government Code Section 659625 and, as a result, create a significant hazard to the public or environment?

Fire hazards exist where highly flammable vegetation and/or litter is located adjacent to development. The PEIR should discuss the proposed Master Plan in terms of human health/public safety as it relates to fire hazards within and adjacent to the plan boundaries.

Given that industrial uses have occurred within portions of the Master Plan area, the PEIR should address the potential for hazardous materials. As part of the environmental review process, steps are needed to disclose and address the safe removal, disposal, and/or remediation of hazardous materials. There are Federal and State requirements that are mandated to be incorporated into a project that may have these issues. The PEIR should include a general, qualitative evaluation of the potential presence of hazardous materials and the expected nature of these materials that may occur within the planning area.

The PEIR will include a qualitative description of potential hazards and hazardous materials issues that intersect or interface with the Master Plan area. However, a quantified analysis based on Phase I site assessments would not be addressed in the PEIR. The PEIR should however provide recommendations for when future project would be required to conduct Phase I site assessments as part of subsequent environmental review under CEQA.

HYDROLOGY/WATER QUALITY

Issue 1: Would the proposed Master Plan result in an increase in impervious surfaces and associated increased runoff? Would the proposed Master Plan result in a substantial alteration to on-and off-site drainage patterns due to changes in runoff flow rates or volumes?

Issue 2: What modifications to the natural drainage system would be required for implementation of the proposed Master Plan? Would there be an effect on the drainage basins within the San Diego River watershed with implementation of the proposed Master Plan?

Issue 3: Would the proposal result in alterations to the course or flow of flood waters?

Issue 4: Would the proposed Master Plan create discharges into surface or ground water, or in any alteration of surface or ground water quality, including, but not limited to temperature, dissolved oxygen or turbidity? Would there be increases in pollutant discharges including downstream sedimentation?

Issue 5: Would the proposed Master Plan when considered in combination with past, current, and future projects in the affected watersheds, result in cumulative significant impacts on the hydrology and water quality?

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.

The Master Plan proposes to enhance the natural hydrologic process of the river to improve its flow and water quality. A technical study should be prepared for the PEIR to address the existing conditions, potential constraints and opportunities related to hydrology resources within the project study area. The study will be based on an existing inventory of hydrology resource information already assembled for the draft Master Plan and other related documents.

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 should discuss how the proposed Master Plan could affect water quality within the project area and downstream.

A technical study should be prepared for the PEIR to address the existing conditions, potential constraints and opportunities related to water quality within the project study area. The study will be based on water quality information already assembled for the draft Master Plan and other related documents.

GEOLOGY/SOILS

Issue 1: Would the proposed Master Plan expose people or property to geologic hazards such as earthquakes, landslides, mudslides, liquefaction, ground failure, or similar hazards?

Issue 2: Would the land uses proposed by the Master Plan increase the potential for erosion of soils on- or off-site?

The geologic and subsurface conditions in the proposed project area will be described in this section, along with the existing topography, geology (surface and subsurface), tectonics and soil types. Possible impacts to the Master Plan from geologic hazards and unfavorable soil conditions also will be addressed. The constraint discussion should include issues such as the potential for liquefaction, slope instability, and rockfall hazards. Any need for blasting should also be identified, if such measures are anticipated. Any secondary issues due to soils/geology (e.g., excavation of unsuitable soils) should also be addressed.

The PEIR will include a qualitative description of potential geologic hazards issues that could be encountered within the Master Plan area. However, a quantified analysis based on project level geotechnical analysis would not be addressed in the PEIR. The PEIR should however provide recommendations for when future project would be required to conduct geotechnical assessments as part of subsequent environmental review under CEQA. This could be shown in table form in the PEIR and must reference the City's Seismic Safety study (1995).

PALEONTOLOGICAL RESOURCES

Issue 1: Would the proposed Master Plan result in the loss of significant paleontological resources?

The PEIR should include a discussion of the potential for loss of sensitive paleontological resources in conjunction with the implementation of the proposed Master Plan. Although the Master Plan will not result in direct impacts, the PEIR should discuss cumulative impacts relative to the loss of paleontological resources.

TRAFFIC/CIRCULATION

Issue 1: Would the proposed Master Plan result in an increase in projected traffic that is substantial in relation to the capacity of the existing and planned circulation system?

Issue 2: Would the proposed Master Plan create alterations to present circulation movements in the area including effects on existing public access points?

Issue 3: Would the proposed Master Plan impact the availability of parking?

Issue 4: Would the proposed Master Plan conflict with the adopted policies, plans or programs supporting alternative transportation modes (e.g. bus turnouts, trolley extensions, bicycle lanes, bicycle racks, etc.)?

The proposed Master Plan should include a traffic study to estimate the expected trips at buildout and at interim year scenarios in order to document impacts on intersections, roadways, and freeways throughout the entire project area. The traffic report would be based on transportation and circulation information already assembled for the draft Master Plan and other related documents and would form the basis of the impact analysis for this section of the draft PEIR. The study should evaluate the traffic volumes and levels of service on existing and proposed circulation element roadways and include determinations on the adequate types and classifications of streets and intersections based on the City of San Diego standards. The traffic study and PEIR should include descriptions and applicable graphics of the existing transportation conditions within the Master Plan area.

PUBLIC SERVICES

Issue 1: Would the proposed Master Plan result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for any of the public services?

The PEIR analysis of public facilities should determine if the proposed Master Plan would result in impacts to fire, police, school, solid waste, or park services within the project area. The PEIR should describe the public services currently available and how they intersect or interface with the River Park.

POPULATION AND HOUSING

Issue 1: Would the land use modifications associated with the proposed Master Plan induce substantial population growth in the area?

The PEIR should describe the potential for impacts that may result from substantial population growth, including growth inducing impacts as discussed in Section V, below, compliance with the City's Affordable Housing Ordinance, and other impacts related to the proposed Community Plan Amendments.

ISSUES FOUND NOT TO BE SIGNIFICANT

A separate section of the PEIR should include a brief discussion of issue areas that were not considered to be potentially significant. If these or other potentially significant issue areas arise during detailed environmental investigation of the project, however, consultation with this division is recommended to determine if these other issue areas need to be addressed in the PEIR. Additionally, as supplementary information is submitted, the PEIR may need to be expanded to include additional issue areas. Based on preliminary analysis, issue areas that were not considered to be potentially significant include: Agriculture, Mineral Resources, Noise and Utilities, but should be discussed briefly in the PEIR.

MITIGATION, MONITORING, AND REPORTING PROGRAM (MMRP)

Mitigation measures should be clearly identified, discussed, and their effectiveness assessed in each issue section of the PEIR. A MMRP for each mitigation measure must be included. At a minimum, this 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, which will be attached to the PEIR.

IV. SIGNIFICANT IRREVERSIBLE ENVIRONMENTAL CHANGES

In accordance with CEQA Section 15126.2(c), the PEIR must include a discussion on any significant irreversible environmental changes which would be caused by the proposed action should it be implemented. The PEIR should provide recommendation for how future projects could nonrenewable resources. See CEQA Section 15127 for limitation on the requirements for this discussion.

V. GROWTH INDUCEMENT

Although implementation of the Master Plan would not be considered growth inducing since the area is already predominantly built out and redevelopment associated with the specific plans would occur with or without enhancement of the river, the PEIR should address the potential for growth inducement. This section need not conclude that growth-inducing impacts, if any, are significant unless the project would induce substantial growth or concentration of population.

VI. CUMULATIVE IMPACTS

When the proposed Master Plan is considered with other past, present, and reasonably foreseeable projects in the City of San Diego and the communities of Mission Valley, Navajo, Tierrasanta, and East Elliot, implementation could result in significant environmental changes which are individually limited but cumulatively considerable. Therefore, in accordance with Section 15130 of the CEQA Guidelines, potential cumulative impacts should be discussed in a separate section of the PEIR.

Issue 1: What are the cumulative impacts of the proposed Master Plan in conjunction with other approved or proposed projects within the subregional area?

The PEIR should summarize the overall short-term and long-term impacts the proposed Master Plan could have in relation to other planned and proposed projects in the area defined above.

VII. ALTERNATIVES

The PEIR should analyze reasonable alternatives which avoid or mitigate the proposed Master Plan's significant environmental impacts. These alternatives should be identified and discussed in detail, and should address all significant impacts. The alternative's analysis should be conducted in sufficient graphic and narrative detail to clearly assess the relative level of impacts and feasibility. Preceding the detailed alternatives analysis should be a section entitled "Alternatives Considered but Rejected." This section should include a discussion of preliminary alternatives that were considered but not analyzed in detail. The reason for rejection should be explained.

In this PEIR, two alternatives will be addressed which will include the "No Project Alternative" and the "Environmentally Superior/Reduced Project Alternative". The "No Project Alternative" should reflect a continuation of the proposed Master Plan area with the existing community plans. The "Environmentally Superior/Reduced Project Alternative" should show implementing a Master Plan with similar uses, but with a smaller plan area than the proposed Master Plan. These alternatives should address issues at a programmatic level and should not be developed to reduce or avoid impacts of a specific project or project level concerns.

Until a screen check PEIR is submitted which addresses all of the above issues, the processing timeline for this project will be held in abeyance. Contact Myra Herrmann, Senior Planner, at (619) 446-5372, if you have any questions.

Sincerely,



Cecilia Gallardo, AICP
Assistant Deputy Director
Development Services Department