



FINAL

**Program Environmental Impact Report
Morena Corridor Specific Plan
San Diego, California**

**Project No. 582608
SCH # 2016101021**

February 1, 2019



The City of
SAN DIEGO 

FINAL PROGRAM ENVIRONMENTAL IMPACT REPORT

Project No. 582608
SCH No. 2016101021

SUBJECT: MORENA CORRIDOR SPECIFIC PLAN

Applicant: City of San Diego Planning Department

FINAL DOCUMENT – FEBRUARY 1, 2019:

In response to comments received during public review, minor revisions and clarifications have been made to the document which do not change the conclusions of the Draft Program Environmental Impact Report (PEIR) regarding the project's potential environmental impacts and required mitigation. As defined in CEQA Section 15088.5, minor revisions and clarifications to the document – which are shown in ~~strikeout~~/underline format – do not represent “significant new information” and therefore, recirculation of the Draft PEIR is not warranted. No new significant environmental impacts would occur from these modifications, and similarly, no substantial increase in the severity of environmental impacts would occur.

PROJECT DESCRIPTION:

The proposed Morena Corridor Specific Plan would increase residential density in Linda Vista by redesignating and rezoning land to allow for transit-oriented development adjacent to the future Tecolote Road Trolley Station and the existing Morena/Linda Vista Trolley Station. The proposed Specific Plan provides policies and recommendations for new residential and mixed-use development and improvements to the public right-of-way to enhance access to the trolley stations within the Specific Plan area that capitalize on the new regional transit connections in the area. The proposed project would redesignate approximately 50 acres of Commercial and Industrial land uses to the Community Village land use designation within the Linda Vista community. The Community Village land use designation would allow for the development of multi-family housing in a mixed-use setting and commercial, service, and civic uses. The amendment would also revise the planned street network within the Linda Vista community to create a grid network through the eastern extension of Morena Boulevard to Linda Vista Avenue and the removal of the segment of Napa Street between Morena Boulevard and Linda Vista Road from the street network.

Implementation requires City Council approval and adoption of the proposed Morena Corridor Specific Plan and associated discretionary actions, including an amendment to the Linda Vista Community Plan to reflect the proposed land use and mobility changes, and to remove the area from the Community Plan Implementation Overlay Zone (CPIOZ); an amendment to the Clairemont Mesa Community Plan to reflect the proposed mobility changes; and an

amendment to the Land Development Code to remove Linda Vista from the Community Plan Implementation Overlay Zone. The project also requires a rezone of property in portions of the Specific Plan area within the Linda Vista Community Plan area. An update to the Impact Fee Study (formerly known as the Public Facilities Financing Plan) for the Linda Vista Community Plan area is also proposed for adoption as a subsequent discretionary action. Collectively, these actions together with the proposed Morena Corridor Specific Plan form the project analyzed in the Program Environmental Impact Report (PEIR).

PROJECT LOCATION:

The Specific Plan area is approximately 280 acres along Morena Boulevard and West Morena Boulevard between Clairemont Drive and Friars Road. This area is within the Clairemont Mesa Community Plan Area and the Linda Vista Community Plan Area. To the west, the Specific Plan area is bounded by the railroad right-of-way and Interstate 5, which separate the community from Mission Bay. To the north and east, the Specific Plan area is shaped by the sloping topography and single-family residential neighborhoods in Clairemont Mesa, and the University of San Diego and multifamily and student housing in Linda Vista. To the south is the San Diego River and Interstate 8, which separate the Specific Plan area from Old Town San Diego.

The San Diego Trolley will connect Downtown San Diego to the University of California, San Diego and University Towne Center, along the west side of Morena Boulevard. The Specific Plan area includes the Morena/Linda Vista Trolley Station at Morena Boulevard and Linda Vista Road, the future Tecolote Road Trolley Station at West Morena Boulevard and Tecolote Road, and the future Clairemont Drive Trolley Station at Morena Boulevard and Clairemont Drive.

ENVIRONMENTAL DETERMINATION:

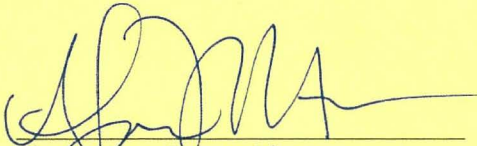
The purpose of this document is to inform decision-makers, agencies, and the public of the significant environmental effects that could result if the project is approved and implemented, identify possible ways to minimize the significant effects, and describe a reasonable range of alternatives to the project.

Based on the analysis conducted for the project described above, the City of San Diego has prepared the following Draft PEIR in accordance with CEQA. The analysis conducted identified that the proposed project could result in significant and unavoidable impacts in the areas of **Transportation and Circulation (Roadway Segments, Intersections, and Freeway Segments)**, **Noise (Vehicle Traffic Noise, Temporary Construction Noise, Construction-related Vibration)**, **Air Quality (Conflicts with Air Quality Plans, Air Quality Standards)**, **Historical and Tribal Cultural Resources (Historic Resources, Archaeological Resources, and Tribal Cultural Resources)**, **Paleontological Resources (Ministerial Projects)**, and **Visual Effects and Neighborhood Character (Scenic Vistas or Views, Neighborhood Character)**. All other impacts analyzed in this Draft PEIR were found to be less than or not significant.

This document has been prepared by the City of San Diego's Planning Department and is based on the City's independent analysis and determinations made pursuant to Section 21082.1 of the California Environmental Quality Act (CEQA) and Section 128.0103(a) and (b) of the San Diego Municipal Code.

RESULTS OF PUBLIC REVIEW:

- () No comments were received during the public input period.
- () Comments were received but did not address the accuracy or completeness of the draft environmental document. No response is necessary and the letters are incorporated herein.
- (X) Comments addressing the accuracy or completeness of the draft environmental document were received during the public input period. The letters and responses are incorporated herein.



Alyssa Muto, Deputy Director
Planning Department

August 01, 2018
Date of Draft Report

February 1, 2019
Date of Final Report

Analyst: Rebecca Malone, AICP, Planning Department

PUBLIC REVIEW DISTRIBUTION:

The following agencies, organizations, and individuals received a copy or notice of the Draft PEIR and were invited to comment on its accuracy and sufficiency. Copies of the Draft PEIR and any technical appendices may be reviewed in the office of the Planning Department, or purchased for the cost of reproduction.

FEDERAL GOVERNMENT

U.S. Environmental Protection Agency (19)
U.S. Fish and Wildlife Service (23)
U.S. 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)
Housing and Community Development Department (38)
Department of Toxic Substance Control (39)
Natural Resources Agency (43)
Regional Water Quality Control Board, Region 9 (44)
State Clearinghouse (46A)
California Air Resources Board (49)
California Transportation Commission (51)

California Department of Transportation (51A & 51B)
Native American Heritage Commission (56)
California Public Utilities Commission

COUNTY OF SAN DIEGO

Air Pollution Control District (65)
Planning and Development Services (68)
County Water Authority (73)
Department of Environmental Health (76)

CITY OF SAN DIEGO

Office of the Mayor (91)
Council President Gomez, District 9
Council President Pro Tem Bry, District 1
Councilmember Campbell, District 2
Councilmember Ward, District 3
Councilmember Montgomery, District 4
Councilmember Kersey, District 5
Councilmember Cate, District 6
Councilmember Sherman, District 7
Councilmember Moreno, District 8

Office of the City Attorney

Corrine Neuffer, Deputy City Attorney

Planning Department

Mike Hansen, Director
Tom Tomlinson, Assistant Director

Planning Department, cont.

Alyssa Muto, Deputy Director
Laura Black, Deputy Director
Tait Galloway, Program Manager
Michael Prinz, Senior Planner
Rebecca Malone, Senior Planner
Elena Pascual, Assistant Planner
Jordan Moore, Assistant Planner
George Ghossain, Senior Traffic Engineer
Claudia Brizuela, Associate Traffic Engineer
Pedro Valera, Assistant Traffic Engineer
Myra Herrmann, Senior Planner
Susan Morrison, Associate Planner
Sara Osborn, Senior Planner
Shannon Scoggins, Park Designer – Park Planning
Kelley Stanco, Senior Planner – Historic Resources
Frank January, Project Manager

Development Services Department

Gary Geiler, Deputy Director
PJ Fitzgerald, Assistant Deputy Director

Peter Kann, Development Project Manager I
James Quinn, Senior Engineer Geologist
Jay Purdy, Assistant Engineer – Civil
Bill Prinz, Program Manager

Environmental Services Department

Lisa Wood, Senior Planner

Fire-Rescue Department

Larry Trame, Assistant Fire Marshal

Police Department

Tristan Schmottlach, Sergeant
Jason Zdunich, Police Officer II

Public Utilities Department

George Adrian, Program Manager
Shelby Gilmartin, Assistant Engineer – Civil

Transportation & Storm Water Department

Mark Stephens, Associate Planner

Real Estate Assets Department

Cybele Thompson, Director

Economic Development Department

Cody Hooven, Director

Libraries

Central Library, Government Documents (81 & 81A)
Clairemont Branch Library (81H)
Linda Vista Branch Library (81M)

City Advisory Boards or Committees

Historical Resources Board (87)

Other City Governments

San Diego Association of Governments (108)
Metropolitan Transit System (112/115)
San Diego Gas & Electric (114)

School Districts

San Diego Unified School District (132)

Community Planning Groups or Committees

Clairemont Mesa Planning Group (248)
Linda Vista Planning Group (267)

Community Councils

Clairemont Town Council (257)

Linda Vista Town Council

Other Agencies, Organizations and Individuals

The San Diego River Park Foundation (163)

San Diego River Coalition (164)

Sierra Club San Diego Chapter (165)

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)

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 Archaeological Center (212)

Save Our Heritage Organisation (214)

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)

Ewiiapaayp Band of Mission Indians (225C)

Inaja Band of Mission Indians (225D)

Jamul Indian Village (225E)

La Posta Band of Mission Indians (225F)

Other Agencies, Organizations and Individuals, cont.

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 (225O)

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)

University of San Diego (269)
Friars Village HOA (270)
Mission Bay Park Committee (318A)
Joseph Armeanio
Carol Baker
Mike Baker
Wendy Bashant
Joseph Bell
Sara Bell
Tim Bell
Constance A. Biewer
Jessica Bowlin
Caster Properties, Inc.
Margarita Castro
Brent Clifford
Marissa Colburn
Michael Colburn
Anthony Cresap
Janet Croft
Karl Croft
Erin Cullen
Arlene Dalton
Walter Deal
Perry Dealy
Jim Elko
Russ Eskilsun
James D. Evans
Janette Faust
Karen Friedrichs
Elwyn Garrard
Tirzo Gonzalez
Joan L. Green
Ed Greene
Sharon Griffin
Martin Habel
Abbie Hawkins
Hazard Jr., Enterprises LP
George Henderson
Other Agencies, Organizations and Individuals, cont.
George Holombo
Mike Hunsaker
Jennifer Hunt
Lorraine Jeanes
David Kornblatt
Melissa Kornblatt
Linda Krueger
Grant Kuhn
Al Lieb
Peg Lieb

Irene Magallanez
Katherine Malchiodi
Debra Marks
Ed McCoy
Cris Medrano-Huffer
Joel Morrison
Vicky Morrison
Eugenie Newton
Chris O'Connell
Rolando Ogot
Stephanie Pfaff
Holly Quan
Ellen Quigley
Patricia Rolla
Carol Schleisman
Daniel Smiechowski
Ky Snyder
Derek Someda
Eva Stresemann
Elke Stuart
Sweig General Contracting, Inc.
Serene Tan
Ming Tom
Barbarah Torres
Howard Wayne
Kimberly Weber
Douglas Wetzel
Ted Yates
Gregory Yee
John Ziebarth

RESPONSE TO COMMENTS

**Table 1-1
LETTERS RECEIVED**

Letter	From	Date
A	State Clearinghouse	October 2, 2018
B	Stephanie Pfaff	August 2, 2018
C	Sarah Hudson	August 3, 2018
D	Arlene Dalton	August 6, 2018
E	California Public Utilities Commission	August 7, 2018
F	Lorraine Jeanes	August 8, 2018
G	Viejas Tribal Government	August 10, 2018
H	Joan L. Green	August 14, 2018
I	Brent Clifford	August 15, 2018
J	Howard Wayne	August 21, 2018
K	Sharon Griffin	August 22, 2018
L	George Henderson	August 22, 2018
M	Martin Habel	August 27, 2018
N	Karen Friedrichs	August 29, 2018
O	Joseph and Sara Bell	August 31, 2018
P	Abbie Hawkins	September 4, 2018
Q	Walter Deal	September 7, 2018
R	Ted Yates	September 8, 2018
S	Katherine Malchiodi	September 9, 2018
T	Anonymous	September 11, 2018
U	Serene Tan	September 12, 2018
V	California Department of Transportation	September 12, 2018
W	Patricia Rolla	September 13, 2018
X	Wendy Bashant	September 13, 2018
Y	San Diego Association of Governments	September 17, 2018
Z	Clairemont Community Planning Group	September 18, 2018
AA	Jessica Bowlin	September 19, 2018
AB	Michael and Marissa Colburn	September 19, 2018
AC	Ed Greene	September 20, 2018
AD	Al and Peg Lieb	September 20, 2018
AE	University of San Diego	September 20, 2018
AF	Jennifer Hunt	September 21, 2018
AG	Constance A. Biewer	September 23, 2018
AH	Grant Kuhn	September 24, 2018
AI	Janette Faust	September 25, 2018
AJ	Tim Bell and Linda Krueger	September 26, 2018
AK	Douglas Wetzel	September 26, 2018
AL	Derek Someda	September 27, 2018

**Table 1-1
LETTERS RECEIVED**

Letter	From	Date
AM	Walter Deal	September 27, 2018
AN	Janet Croft	September 27, 2018
AO	Perry Dealy	September 27, 2018
AP	John Ziebarth	September 28, 2018
AQ	Rolando Ogot	September 28, 2018
AR	Linda Vista Planning Group	September 28, 2018
AS	Cris Medrano-Huffer	September 28, 2018
AT	Stephanie Pfaff	September 29, 2018
AU	Gregory Yee	September 29, 2018
AV	Eugenie Newton	September 29, 2018
AW	Carol Schleisman	September 30, 2018
AX	Elke Stuart	September 30, 2018
AY	Mike Baker	September 30, 2018
AZ	Tirzo Gonzalez and Eva Stresemann	September 30, 2018
BA	Elwyn Garrard	September 30, 2018
BB	James D. Evans	September 30, 2018
BC	Melissa and David Kornblatt	September 30, 2018
BD	Jim Elko	September 30, 2018
BE	Hazard Jr., Enterprises LP	September 30, 2018
BF	George Holombo/Holly Quan	October 1, 2018
BG	Debra Marks	October 1, 2018
BH	Karl and Janet Croft	October 1, 2018
BI	Carol Baker	October 1, 2018
BJ	Ellen Quigley	October 1, 2018
BK	Barbarah Torres	October 1, 2018
BL	Erin Cullen	October 1, 2018
BM	Caster Properties, Inc.	October 1, 2018
BN	Sweig General Contracting, Inc.	October 1, 2018
BO	Mike Hunsaker	October 1, 2018
BP	Irene Magallanez	October 1, 2018
BQ	Joseph Armeanio	October 1, 2018
BR	Anthony Cresap	October 2, 2018

Letter A



EDMUND G. BROWN JR.
GOVERNOR

STATE OF CALIFORNIA
GOVERNOR'S OFFICE OF PLANNING AND RESEARCH



KEN ALEX
DIRECTOR

October 2, 2018

Rebecca Malone
City of San Diego
9485 Aero Dr, MS 413
San Diego, CA 92123

Subject: Morena Corridor Specific Plan EIR
SCH#: 2016101021

Dear Rebecca Malone:

A-1

The State Clearinghouse submitted the above named Draft EIR to selected state agencies for review. On the enclosed Document Details Report please note that the Clearinghouse has listed the state agencies that reviewed your document. The review period closed on October 1, 2018, and the comments from the responding agency (ies) is (are) enclosed. If this comment package is not in order, please notify the State Clearinghouse immediately. Please refer to the project's ten-digit State Clearinghouse number in future correspondence so that we may respond promptly.

Please note that Section 21104(c) of the California Public Resources Code states that:

"A responsible or other public agency shall only make substantive comments regarding those activities involved in a project which are within an area of expertise of the agency or which are required to be carried out or approved by the agency. Those comments shall be supported by specific documentation."

These comments are forwarded for use in preparing your final environmental document. Should you need more information or clarification of the enclosed comments, we recommend that you contact the commenting agency directly.

This letter acknowledges that you have complied with the State Clearinghouse review requirements for draft environmental documents, pursuant to the California Environmental Quality Act. Please contact the State Clearinghouse at (916) 445-0613 if you have any questions regarding the environmental review process.

Sincerely,

Scott Morgan
Director, State Clearinghouse

Enclosures
cc: Resources Agency

1400 10th Street P.O. Box 3044 Sacramento, California 95812-3044
1-916-322-2318 FAX 1-916-558-3181 www.opr.ca.gov

A-1 Receipt of the State Clearinghouse letter is acknowledged.

**Document Details Report
State Clearinghouse Data Base**

SCH#	2016101021		
Project Title	Morena Corridor Specific Plan EIR		
Lead Agency	San Diego, City of		

Type	EIR	Draft EIR
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Description Note: Extended Review Per Lead: See under "Draft CEQA Documents", August 3, 2018:
<https://www.sandiego.gov/planning/programs/ceqa>

The proposed project would increase residential density in Linda Vista by redesignating and rezoning land to allow for transit-oriented development adjacent to the future Tecolote Rd Trolley Station and the existing Morena/Linda Vista Trolley Station. The proposed SP provides policies and recommendations for new residential and mixed-use development and improvements to the public ROW to enhance access to the trolley stations within the SP area that capitalize on the new regional transit connections in the area. The proposed project would redesignate approx 50 acres of commercial and industrial land uses to the community village LUD within the Linda Vista community. The community village LUD would allow for the development of multi-family housing in a mixed-use setting and commercial, service, and civic uses. The amendment would also revise the planned street network within the Linda Vista community to create a grid network through the eastern extension of Morena Blvd to Linda Vista Ave and the removal of the segment of Napa St between Morena Blvd and Linda Vista Rd from the street network.

Lead Agency Contact

Name	Rebecca Malone		
Agency	City of San Diego		
Phone	(619) 446-5371	Fax	
email			
Address	9485 Aero Dr, MS 413		
City	San Diego	State	CA Zip 92123

Project Location

County	San Diego		
City	San Diego		
Region			
Lat / Long			
Cross Streets	Gesner St, Morena Blvd, W Morena Blvd, Friars Rd		
Parcel No.			
Township	Range	Section	Base

Proximity to:

Highways	I-5, I-8
Airports	SD Intl
Railways	SD MTS Trolley, Amtrak, AT&SF, C
Waterways	Tecolote Creek, Mission Bay, San Diego River, Rose Creek
Schools	San Diego USD
Land Use	Mix of res, commercial, industrial, parks and rec, PF & Utilities, undeveloped

Project Issues Air Quality; Archaeologic-Historic; Biological Resources; Drainage/Absorption; Flood Plain/Flooding; Geologic/Seismic; Noise; Public Services; Recreation/Parks; Soil Erosion/Compaction/Grading; Solid Waste; Toxic/Hazardous; Traffic/Circulation; Vegetation; Water Quality; Water Supply; Landuse; Cumulative Effects; Aesthetic/Visual; Sewer Capacity

Reviewing Agencies Resources Agency; Department of Fish and Wildlife, Region 5; Cal Fire; Department of Parks and Recreation; Department of Water Resources; Caltrans, Division of Aeronautics; California Highway Patrol; Caltrans, District 11; Department of Housing and Community Development; Regional Water Quality Control Board, Region 9; Air Resources Board, Transportation Projects; Native American

Note: Blank in data fields result from insufficient information provided by lead agency.

LETTER

RESPONSE

**Document Details Report
State Clearinghouse Data Base**

Heritage Commission; San Diego River Conservancy; Public Utilities Commission

Date Received 08/02/2018 *Start of Review* 08/02/2018 *End of Review* 10/01/2018

Letter B

From: Stephanie Pfaff
To: [PLN_PlanningCEQA](#)
Subject: PROJECT NAME: Morena Corridor Specific Plan PROJECT No.: 582608
Date: Thursday, August 02, 2018 9:17:46 PM
Attachments: [Morena VillageTecolote Village.png](#)
[Morena Station.png](#)

B-1

The Morena Specific Plan states that Morena Station would have residential density up to 73 DU/AC if permitted.

Community Village (0-54 DU/AC)* - Morena Station District

Provides for a high-density mix of retail, service, dining, and office commercial uses as well as civic, institutional, and multifamily residential uses in a mixed-use setting.

*Residential density up to 73 DU/AC allowed through a public review and decision process via a Planned Development Permit. Please refer to Chapter 8.



Community Village (0-54 DU/AC)* - Tecolote Village District

Provides for a high-density mix of retail, service, dining, and office commercial uses as well as civic, institutional, and multifamily residential uses.

*Residential density up to 109 DU/AC allowed through a public review and decision process via a Planned Development Permit. Please refer to Chapter 8.



However, in the CEQA document the Morena Station is up to 109 DU/AC through TODEP. Is this a misprint? It says "Tecolote Village Residential Density up to 109 DU/AC through TODEP" in the Morena Station description.

B-1

The Morena Corridor Specific Plan would allow for development up to 73 dwelling units per acre in the Morena Station District with approval of a Planned Development Permit through the Transit-Oriented Development Enhancement Program. The table in Chapter 3.0, Project Description, has been corrected in the Final PEIR.

Morena Station District

The Morena Station District includes the area surrounding the existing Morena/Linda Vista Trolley Station, an area with improved access to the Morena/Linda Vista Trolley Station. This district is envisioned as a community village that completes the grid network – establishing a street system that encourages a pedestrian scale and walkable development pattern. This district can utilize the TODEP, which would allow for increases in residential density, building heights, and floor area ratio with the approval of a Planned Development Permit.

Existing Development	Acres
Single-Family Residential	3.50
Multi-Family Residential	3.00
Retail, Regional, Wholesale Commercial	14.00
Office Commercial	2.75
Light Industrial	11.00
Communications/Utilities	4.25
University	2.50
Park	1.00
Institutional	9.25
Surface Parking Lot	1.75
Vacant/Undeveloped	0.50
Morena Station District Total	54.50

Adopted Land Use	Acres
Residential – Medium High (30-43 du/ac)	4.00
General Commercial (0-29 du/ac)	27.75
Community Commercial (0-29 du/ac)	17.25
Park	1.00
Institutional	4.50
Morena Station District Total	54.50

Proposed Land Use	Acres
Community Commercial (0-29 du/ac)	8.00
Community Commercial (0-54 du/ac)	4.00
Community Village* (0-54 dwelling units/acre)	28.50
*Tecolote Village Residential Density up to 109 dwelling units/acre through TODEP.	
Park	1.00
Institutional	13.00
Design District Total	54.50

Acres rounded to the nearest ¼ acre.

Existing Development



Adopted Community Plan Land Use



Proposed Land Uses



Thank you-

Stephanie Pfaff

LETTER

RESPONSE

Letter C

From: Hudson Sarah
To: [PLN_PlanningCEQA](#)
Cc: [Malone, Rebecca](#); [Garcia Paul](#); [Marques Marceline](#)
Subject: RE: Draft PEIR - Morena Corridor Specific Plan / Project No. 582608
Date: Friday, August 03, 2018 11:37:09 AM

To whom it may concern:

This is a response to the Draft PEIR as noted in the subject line.

C-1

Page 2-55, Section 2.3.13.5 School Services.

- a. San Diego Unified School District (SDUSD) covers approximately 208 square miles, not 354.
- b. The count of schools appears to include charter schools (48). SDUSD is the authorizing agency for charter schools but they operate independently; we do not operate them. Below is the count of district-run schools for the 2017-18 school year using our classification scheme.
 - i. 108 elementary schools
 - ii. 9 K-8 schools
 - iii. 25 middle schools
 - iv. 21 traditional high schools, 1 alternative high school (East Village), 2 independent study high schools (iHigh and MET), and 2 continuation high schools (Garfield and Twain)
 - v. 1 adult school
 - vi. 1 K-12 independent study school (Mt Everest)
 - vii. 1 community day school (ALBA)
 - viii. 1 6-12 school (SCPA)
 - ix. 1 K-12 regular education school (John Muir)
 - x. 3 special education schools (TRACE, Riley/New Dawn, Whittier)
 - xi. 1 home and hospital program

C-2

Page 6.13-6.

- a. General comment: The middle and high schools currently serving the Special Plan area have some available capacity at this time, but that is no guarantee of future availability of capacity. It is impossible to know what the state of school

C-1

The City thanks the San Diego Unified School District for their letter and has made the appropriate changes in Section 6.13, Public Services and Facilities, in the Final PEIR.

C-2

See Response C-1.

LETTER

RESPONSE

C-3

- capacity will be at some unknown point in the future when proposed project buildout actually occurs.
- b. Specific error: The statement "...SDUSD could obtain needed capacity at [the two elementary schools] by transferring nonresident students to other schools" is a misrepresentation of the information I provided. SDUSD would not transfer existing students away from their current school of attendance. The strategy SDUSD employs is to reduce the number of incoming nonresidents to Bay Park and Toler over time, in order to free up capacity for residential growth. We would begin reducing nonresidents admitted to the schools a few years before the expected residential growth.

Thank you.

Sarah

Sarah Hudson

Demographer, San Diego Unified School District
Instructional Facilities Planning Department
Telephone (619) 725-7369
shudson@sandi.net

From: Malone, Rebecca [<mailto:RMalone@sandiego.gov>]

Sent: Wednesday, August 1, 2018 11:39 AM

To: Malone, Rebecca <RMalone@sandiego.gov>

Subject: Draft PEIR - Morena Corridor Specific Plan / Project No. 582608

DRAFT PEIR

Please see the link below for the Morena Corridor Specific Plan Draft PEIR and Appendices, Project No. 582608.

See under "Draft CEQA Documents", August 1, 2018:
<https://www.sandiego.gov/planning/programs/ceqa>

Rebecca Malone, AICP

Senior Planner
Planning Department
City of San Diego

T: 619-446-5371
sandiego.gov

C-3 See response to comment C-1.

LETTER

RESPONSE

Letter D

From: Dalton
To: [PLN_PlanningCEQA](#)
Subject: Morena Corridor Specific Plan Comments
Date: Monday, August 06, 2018 6:22:31 PM

Project Name: Morena Corridor Specific Plan

Project No. : 582608 / SCH No. 2016101021

Wish to mention three concerns:

- D-1 1. We are already being asked to conserve water. We are already cutting back and putting a bucket in the shower (as an example). How can you possibly think of putting more people in this area when there already is not enough water?
- D-2 2. We are already being asked to cut back on our electricity usage during hot days during peak usage hours because the grid cannot handle the demands now. What do you think will happen when a lot more housing and people come into the area? Power outages...
- D-3 3. Traffic is already bad in places like Clairemont Drive in the morning commute time. Lots of areas in District 2 are already congested and parking is hard to find. Again, adding more housing / people is going to make things worse.
- D-4 The idea of building housing for people who make minimum wage is a good idea. People who don't make a lot of money also need apartments and houses. But they should be built in more open and less established areas.
- D-5 My last comment is: if you are going to do this no matter what the current residents want, then at least go with the smallest number of units possible.

Thank you, Arlene Dalton
 District 2

- D-1 A Water Supply Assessment was prepared for the Morena Corridor Specific Plan that determined there was sufficient water planned to supply the estimated annual average usage associated with buildout of the Specific Plan. Furthermore, the PEIR for the Specific Plan analyzed potential impacts related to water supply (Section 6.14) and concluded that impacts would be less than significant.
- D-2 Section 6.9, Energy, of the PEIR analyzed potential impacts related to energy usage associated with build-out of the Specific Plan and concluded that impacts would be less than significant.
- D-3 Section 6.2, Transportation and Circulation, of the PEIR addressed the existing conditions in the Specific Plan area intersections, roadway segments, and freeways, as well as conditions for these facilities at build-out of the proposed Specific Plan. Section 6.2.3 analyzed the impact of the proposed Specific Plan on the vehicular circulation of the Specific Plan area. This section acknowledges multiple impacts to intersections, roadway segments, and freeway segments in the Specific Plan area. Section 6.2.5 lists mitigation measures identified in the Traffic Impact Analysis and identifies which ones are proposed as part of the Specific Plan. The Candidate Findings include a discussion of why certain mitigation measures were rejected.
- D-4 Comment noted. This comment does not suggest an inadequacy in the analysis of the PEIR.
- D-5 Comment noted. This comment does not suggest an inadequacy in the analysis of the PEIR.

Letter E

STATE OF CALIFORNIA

EDMUND G. BROWN JR., Governor

PUBLIC UTILITIES COMMISSION

320 WEST 4TH STREET, SUITE 600
LOS ANGELES, CA 90013

August 7, 2018

Rebecca Malone
City of San Diego
9485 Aero Dr, MS 413
San Diego, CA 92123

Re: SCH 2016101021 – Morena Corridor Specific Plan – EIR

Dear Ms. Malone:

- E-1 The California Public Utilities Commission (Commission/CPUC) has jurisdiction over rail crossings (crossings) in California. CPUC ensures that crossings are safely designed, constructed, and maintained. The Commission's Rail Crossings Engineering Branch (RCEB) is in receipt of the *Environmental Impact Report (EIR)* for the proposed Morena Corridor Specific Plan. City of San Diego is the lead agency.
- E-2 The proposed project would increase residential density in Linda Vista to allow for transit-oriented development adjacent to the future Tecolote Road Trolley Station and the existing Morena/Linda Vista Trolley Station. The proposed policies and recommendations would enhance access to the trolley stations. The amendment would also revise the planned street network. There is an at-grade crossing at the intersection of Napa Street and Friars Road. Pedestrians also cross the tracks within each of the rail transit stations.
- E-3 Any development adjacent to or near the railroad or light rail transit right-of-way (ROW) should be planned with the safety of the rail corridor in mind. New developments may increase pedestrian or traffic volumes not only on streets and at intersections, but also at any adjacent rail crossings. Traffic impact studies should analyze rail crossing safety and potential mitigation measures. Safety improvement measures may include the planning for grade separations or improvements to existing at-grade crossings. Examples of improvements include, but are not limited to: addition or upgrade of crossing warning devices, detectable warning surfaces and edge lines on sidewalks, and pedestrian channelization.
- E-4 There are railroad and light rail transit tracks along the limits of the Specific Plan area. Unauthorized access (trespassing) across the ROW is a potential safety concern. Pedestrian and bicycle circulation routes are proposed near the tracks to enhance access to stations. Those routes

- E-1 Comment noted. This comment does not suggest an inadequacy in the analysis of the PEIR.
- E-2 The commenter summarizes some components of the proposed project and does not raise an issue related to the adequacy of the analysis contained within the PEIR.
- E-3 Comment noted. The Specific Plan includes improvements at close proximity to the rail corridor including bicycle lanes and pedestrian walkways. Specific Plan policies support improved pedestrian and bicycle connections west to Mission Bay Park and to trolley stations. Future projects would be required to adhere to safety regulations relating to such development, including coordination with the CPUC, if required to ensure appropriate safety measures are provided to support rail crossing safety.
- E-4 See response to comment E-3.

LETTER

RESPONSE

Morena Village Specific Plan EIR
August 7, 2018

should be designed to clearly prohibit and discourage access onto the tracks, except at authorized locations.

E-5 The construction or modification of crossings typically requires CPUC authorization. We are available to discuss potential safety impacts or concerns at crossings. Please continue to keep us informed of the project's development. More information can be found at:
<http://www.cpuc.ca.gov/crossings>.

If you have any questions, please contact Matt Cervantes at mcj@cpuc.ca.gov or (213) 266-4716.

Sincerely,



Matt Cervantes
Utilities Engineer
Rail Crossings Engineering Branch
Safety and Enforcement Division

CC: State Clearinghouse, P.O. Box 3044, Sacramento, CA 95812-3044

E-5 See response to comment E-3.

LETTER

RESPONSE

Letter F

From: lorraine.jeanes
To: [PLN_PlanningCEQA](#)
Subject: PROJECT No.: 582608 / SCH No. 2016101021 Comments
Date: Wednesday, August 08, 2018 1:35:57 PM

- | | | | |
|-----|---|-----|--|
| F-1 | <p>Hello,</p> <p>I received a copy of the proposed renovation of the Morena Corridor. I have lived and owned in the area for nearly 45 years. It was place that from the late 50s and early 60s when I was just a kid I wanted to live in the area because of it's unique home styles, small homes and streets that didn't quite match but blended with the land to give a sense of openness that my Clairemont childhood home did not have.</p> <p>Many of the things proposed in the project are welcomed although my neighborhood will never be quite the same and the extra mile needs to be traversed to cause a good blending. Yes, I remember when there was a Slaughterhouse where Toy's R Us is now. I happen to like the quanset-huts and super-rustic area that used to be the way we would go to the Anna St dump before MiraMar Landfill was created and before I-5 was even thought of.</p> | F-1 | Introductory comment noted. |
| F-2 | <p>My three concerns are: 1). the re-naming of the Bay Park area to "Tecalote", 2.) the facades and out-of-character of the building project as well as, 3). the "banners" proposed, pictured on page 53.</p> | F-2 | Comment noted. The commenter provides a brief summary of the issues to be discussed in the comment letter. |
| F-3 | <p>Bay Park has from the mid 1930s served as a "community", not a "project" or a "pre-ordained sub-division", but a group of people, who even today, have eased into to join those already there. The project as designed is going to create a tribal "Us v. Them" by not a joining together what has made this area special for 90 years — community. We will already be impacted with a LOT more traffic, increased noise from the trolley. By not going the extra mile in creating an individual place with character, I fear you will, instead, create an instant dislike of the format of the structure which belies the spirit of the area. Changing the name of the area when our community will potentially be as disrupting as the all the other points put together and then placing the new name on the banners is over the top for creating unnecessary anxiety to a proud group.</p> | F-3 | It is not the intent of the Specific Plan Branding and Gateways policies to erect banners featuring new names for the community. The districts identified in the Specific Plan are identified for planning purposes only and it is not intended that these names are used on banners as suggested by the comment. This comment does not suggest an inadequacy in the analysis of the PEIR. |
| F-4 | <p>The banners suggested on page 53 almost announce the arrival of a less-than-savoy land use with little consideration for those already here and I am promoting the idea that you reconsider this decision. I believe that these processes, if put into play in other areas, perhaps in blighted areas of the city, and/or into communities that were being changed into commercial enterprises like Little Italy 30+ years ago. Not here. Similar plans were used near the new library and are ok for that area, but in our area, I believe you need to reconsider the "look" of the homes and developments to be added.</p> | F-4 | Comment noted. This comment does not suggest an inadequacy in the analysis of the PEIR. |
| F-5 | <p>May I suggest your staff check out some of the ideas that were broadcast on PBS last night, "10 Cities that Changed America". Portland, Oregon's downtown area (https://www.pbs.org/video/10-changed-america-10-towns-changed-america/) is nog dissimilar to this area of the Morena Corridor. And the area of Seaside, Florida (https://www.youtube.com/watch?v=Z9F4PDPU524) is another alternative for our renovations that I hope can expand your views of the development planned for these high density areas.</p> | F-5 | Comment noted. This comment does not suggest an inadequacy in the analysis of the PEIR. |
| F-6 | <p>Although you are making strides to make people-friendly areas, I feel you have not gone far</p> | F-6 | Comment noted. This comment does not suggest an inadequacy in the analysis of the PEIR. |

LETTER

RESPONSE

enough for this particular project when it is an area close to Old Town, the San Diego River, Mission Bay, the Presidio, old Hwy 8 and other historical places that could have been an expanding of the historic background of this area rather than to blot it out.

Yes, I know this is an old fashioned industrial pickup drop off area for a lot of years. It was the run off from the bay and river channel in areas. It was a landfill not far away before we even called it a land fill. The old Santa Fe train was also part and parcel of how this city grew and the poor, the military, the catholics and any number groups settled into and expanded this puddle jumping spot only a few miles from "new town". With only a little care some of the architects from the 30s and 40s could be researched and blend the new with the old.

Thank you for requesting the input. I hope you act on some of these ideas and I'm happy to volunteer what I can about the history of this area.

Sincerely,
Lorraine Jeanes
619-275-1393

Letter G



P.O. Box 908
Alpine, CA 91903
#1 Viejas Grade Road
Alpine, CA 91901

Phone: 6194453810
Fax: 6194455337
viejas.com

August 10, 2018

Rebecca Malone
Environmental Planner
City of San Diego Planning Dept.
9485 Aero Drive, MS 413
San Diego, CA 92123

RE: Morena Corridor Specific Plan

Dear Ms. Malone,

G-1 In reviewing the above referenced project the Viejas Band of Kumeyaay Indians ("Viejas") would like to comment at this time.

The project area may contain many sacred sites to the Kumeyaay people. We request that these sacred sites be avoided with adequate buffer zones.

Additionally, Viejas is requesting, as appropriate, the following:

- All NEPA/CEQA/NAGPRA laws be followed
- Immediately contact Viejas on any changes or inadvertent discoveries.

Thank you for your collaboration and support in preserving our Tribal cultural resources. I look forward to hearing from you. Please call me at 619-659-2312 or Ernest Pingleton at 619-659-2314, or email, rteran@viejas-nsn.gov or epingleton@viejas-nsn.gov, for scheduling. Thank you.

Sincerely,

Ray Teran, Resource Management
VIEJAS BAND OF KUMEYAAY INDIANS

G-1 The Draft PEIR, Section 6.5 recognizes that implementation of the Specific Plan could adversely impact prehistoric or historic archaeological resources, sacred sites, and human remains, and/or tribal cultural resources (Impact 6.5-3). Programmatic mitigation is incorporated into the PEIR that would be applied to future development consistent with the Specific Plan. This mitigation (refer to mitigation measure HIST 6.5-2) would ensure potential tribal cultural resources are identified prior to disturbance, would require archaeological and Native American monitoring where appropriate, and would ensure tribes are notified in the event of inadvertent discoveries.

Letter H

From: Joan L. Green
To: [PLN_PlanningCEQA](#)
Subject: Pedestrian bridge
Date: Tuesday, August 14, 2018 4:16:00 PM

- H-1 One of the amenities this neighborhood wanted was a bridge to travel to Mission Bay Park. Would not only be used by neighborhood but visitors also. We need to hear if that is a reality and if not why. Seems to me many obstacles to that bridge. There will be overhead wires for trolley, plus poles every 100' feet on the trolley line. Existing bridge has to have intersections to access freeways and Mission Bay Park. At one of the previous meetings it was mentioned that no extensions can be put on bridge because cannot have additional weight put on it. Would be costly to rebuild this bridge. At next meeting would like to have a discussion about why this pedestrian bridge cannot be built. If it can be built, what would that look like and where would it be located. The public has the right to an honest discussion on this issue. We in the neighborhood have been united in this issue and this was known to city planners from the initial discussions about the plan.

- H-1 As noted in Section 5.2, Transportation and Circulation, of the PEIR, the Specific Plan identifies policies to coordinate with Caltrans to provide bridge connections from the Specific Plan area to Mission Bay Park and improve cyclist mobility over the Clairemont Drive/East Mission Bay Drive and Sea World Drive/Tecolote Road Bridge. Ultimate construction of a bridge would require further feasibility analysis including site-specific environmental analysis and engagement with the community at the time a specific project is proposed.

LETTER

RESPONSE

Letter I

From: Brent Clifford
To: [PLN_PlanningCEQA](#)
Subject: Morena Corridor Specific Plan - 582608 / SCH No. 2016101021
Date: Wednesday, August 15, 2018 12:44:45 PM

PROJECT NAME: Morena Corridor Specific Plan
 PROJECT No.: 582608 / SCH No. 2016101021

- I-1 This plan doesn't include zoning and land use restrictions for the Clairemont Community portion of the Plan- the community and myself want the 30ft height limit and density clearly set out in the Plan. It should be clearly spelled out in this plan as a limitation, and not listed as open to the existing code, allowing for future changes.

Brent Clifford
 2424 Galveston St.

- I-1 As discussed in Section 3.3.1 and 6.7.3 of the PEIR, the Clairemont District portion of the Specific Plan area would maintain the adopted community plan land uses of the Clairemont Mesa Community Plan, and the existing 30-foot height limit within that area would remain.



THE CITY OF SAN DIEGO

M E M O R A N D U M

Letter J

DATE: September 17, 2018

TO: Honorable Councilmember Lorie Zapf

FROM: Mike Hansen, Director, Planning Department ~~PH~~

SUBJECT: Revisions to the Morena Corridor Specific Plan

J-1

Thank you for your recommendations regarding the Morena Corridor Specific Plan. The Planning Department values and appreciates your input and that of residents of the communities you represent. We share your goal of improving the neighborhoods of Bay Park and Morena and welcome feedback on how the plan can best accomplish that.

Based on your request, the following changes will be made to the draft Morena Corridor Specific Plan. These changes will not affect the proposed land use designations, zones or densities.

1. The plan will include language supporting a pedestrian and bicycle bridge between Mission Bay Park and the Specific Plan area over the I-5 freeway.
2. The plan will be amended to retain four lanes in the segment of Morena Boulevard from Ingulf Street to Knoxville Street including two northbound lanes, two southbound lanes, and left-turn pockets at intersections.
3. The Transit-Oriented Development Enhancement Program within the plan will be amended to remove the ability to seek a maximum height of 100 feet in the Tecolote Village District and to remove the ability to seek a maximum height of 65 feet in the Morena Station District through a future Planned Development Permit process. The proposed "by-right" height limit of 45 feet will remain.

We look forward to working closely with you and members of the Clairemont and Linda Vista communities as we refine the Morena Corridor Specific Plan and present it to the City Council for consideration.

Mike Hansen
Director, Planning Department

cc: Honorable Mayor Kevin L. Faulconer
Kris Michell, Chief Operating Officer
Ron Villa, Interim Assistant Chief Operating Officer
David Graham, Deputy Chief Operating Officer Smart & Sustainable Communities
Jessica Lawrence, Director of Finance Policy & Council Affairs, Office of the Mayor

Exhibit 1

J-1

The comment is identified as Exhibit 1 of the letter and is a copy of the September 17, 2018 memo to Lorie Zapf from Mike Hansen, Director, Planning Department.

LETTER

RESPONSE

1448 Elevation Road
San Diego, CA 92110

August 21, 2017

Hon. Lorie Zapf
San Diego City Council Member, District 2
202 C Street
San Diego, CA 92101

Michael Prinz
San Diego Planning Department
1010 Second Ave., MS 413
San Diego, CA 92101

Re: Morena Corridor Specific Plan, Public Review Draft, June 2017
Comments concerning proposed specific plan

J-2

For the past two years I have served as the Chair of the Ad Hoc Subcommittee on the Morena Corridor Specific Plan (Committee) that was established by the Linda Vista Planning Group. In that role I have had substantial involvement in the review of the proposal of the Planning Department, although I am submitting these comment in my individual capacity.

There are some positive aspects in the proposed specific plan ("Plan") such as the reconfiguration of intersections into standard "T" intersections (pages 38, 40) and the development of mixed uses (page 54). However, these are greatly outweighed by the Plan's disregard of community input in its effort at social engineering.

1. The Plan Ignores Community Input

J-3

On February 16, 2016, the Committee unanimously adopted a "Vision Statement and Guiding Principles" that called for: (1) retention of the current height limits; (2) no worsening of traffic; (3) density compatible with the existing neighborhoods; and (4) infrastructure and parks for any increases in density. A copy of the minutes of that meeting is attached to these comments.

The Vision set out in the Plan includes none of these concerns, other than a reference to "adequate infrastructure." (Page 1.) The Guiding Principles in the Plan references improved mobility for all modes of transportation (page 2), but its implementation undermines it.

J-4

In contravention to the Committee's Vision Statement and Guiding Principles, the Plan (1) raises the height limit from its current 30 feet by right and 45 feet by discretion, to 45 feet by right and 100 feet by discretion near the Tecolote station, and to 45 feet by right and 65 feet by discretion near the Morena Station (pages 83, 84); (2) narrows Morena Boulevard southbound to one lane (page 37) and suggests the intersection of Morena and West Morena should be changed to a traffic circle (page 38); (3) increases density from its current 29 dwelling units to the acre to 109 dwelling units to the acre near the Tecolote station and 73 units to the acre near the Morena station (page 84); and (4) does not provide for

Exhibit 2

J-2

Introductory comment noted. This comment does not suggest an inadequacy in the analysis of the PEIR.

J-3

The referenced "Vision Statement and Guiding Principles" is acknowledged. This comment does not suggest an inadequacy in the analysis of the PEIR.

J-4

The comment restates project description information and raises concerns that adequate infrastructure would not be provided in association with the density increases and transportation network changes. However, the Specific Plan provides a policy framework for future development and does not propose any specific development project. As future development occurs, the need for infrastructure improvements would be evaluated on a project-by-project basis to ensure infrastructure improvements are provided concurrent with need. The commenter's statement regarding community outreach is acknowledged.

LETTER

RESPONSE

Wayne Comments, Page 2

the infrastructure the increased density would demand (page 77). Each of these provisions raises serious concerns that will be discussed.

The clear contrast between what the Committee approved, and what the Plan proposes, gives a lie to the Plan's assertion that "community outreach was a collaborative process between community members and the City." Rather, the community outreach was a charade and the community input was ignored. The Plan is so at odds with the community input as to strongly suggest the Planning Department had a predetermined outcome, and the "collaborative process" was so much "checking the box" of public participation.

2. The Comment Period on the Plan Should Be Extended

J-5

The Planning Department has, for at least six months, promised to release a traffic study, but it has not done so. Instead it said the traffic study will be released some time in the fall. The community is now being required to provide its comments on the Plan without seeing the traffic impacts of the Plan.

It is not as though the traffic study does already not exist. Portions of the traffic study were selectively provided by the Planning Department at a meeting of the Clairemont Ad Hoc Committee on July 24, 2017. The limited information showed that the level of service would deteriorate on at least one road in Clairemont. When asked to explain this deterioration, even though no additional housing is contemplated by the Plan in Clairemont, the representative of the Planning Department admitted it was due to the planned increased density in Linda Vista.

No information was provided on density worsening traffic on Morena Boulevard, or the deterioration caused by the Plan halving the number of Morena's southbound lanes. However, because a southbound lane has been eliminated to facilitate trolley construction, residents can already observe that traffic is backed up on Morena, particularly during rush hours.

J-6

At that same Clairemont meeting, it was revealed that the entry speed for the proposed traffic circle at Morena and West Morena would be about 15 miles per hour (the Planning Department, using Orwellian phraseology, called it "traffic calming"). Traffic on Morena Boulevard is about 40 miles an hour. With the "traffic calming" circle slowing traffic on Morena to 15 miles per hour, traffic will be backed up in both directions

Why a traffic circle? Most likely it is derived from the San Diego Climate Action Plan (CAP). At page 38 of the CAP, Action 3.5 provides for implementation of a "Roundabouts Master Plan" to reduce vehicle fuel consumption. It calls for installing 15 traffic circles in San Diego by 2020, and 20 more by 2035. Whether it makes sense to install a traffic circle at this location (and I do not believe it does) is of no matter to the drafters of the Plan. Their marching order is to fill the quota for traffic circles, so they have dropped one here where it will back up traffic and increase fuel consumption and emissions.

J-7

The Plan's increased density will have traffic consequences. Full and complete comments on the Plan cannot be provided in the absence of the opportunity to review the traffic study. The comment period on the Plan should be extended to 60 days after the public release of the traffic study.

J-5

The Transportation Impact Analysis is included as Appendix B to the PEIR and is available for review on the City's website at <https://www.sandiego.gov/planning/programs/ceqa>. As detailed in the Traffic Impact Analysis prepared for the project and summarized in Section 6.2 of the PEIR, the following transportation impacts were identified.

- Impact 6.2-1: Clairemont Drive, from I-5 NB Ramps to Denver Street (LOS E, ΔVC 0.17)
- Impact 6.2-2: Denver Street, from Clairemont Drive to Ingulf Street (LOS F, ΔVC 0.17)
- Impact 6.2-3: Morena Boulevard, south of Linda Vista Road (LOS F, ΔVC 0.27)
- Impact 6.2-4: Intersection #1: E. Mission Bay Drive & Clairemont Drive (LOS F: AM & PM Peak Hour)
- Impact 6.2-5: Intersection #4: Denver Street & Clairemont Drive (LOS F: AM & PM Peak Hour)
- Impact 6.2-6: Intersection #8: Morena Boulevard & Jellett Street (LOS E: PM Peak Hour)
- Impact 6.2-7: Intersection #14: Morena Boulevard & Savannah Street (LOS F: PM Peak Hour)
- Impact 6.2-8: Four consecutive segments of I-5 from Grand Ave/Garnet Ave to Old Town Ave
- Impact 6.2-9: I-8 EB from Morena Boulevard to Hotel Circle
- Impact 6.2-10: I-5 NB On-Ramp/Clairemont Drive
- Impact 6.2-11: I-5 SB On-Ramp/Sea World Drive/Tecolote Road

Impacts 6.2-4, 6.2-6, and 6.2-7 would be mitigated to a less than significant level. All other impacts associated with traffic and transportation were determined to be significant and unavoidable.

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	<p>J-6 The Specific Plan identifies that a roundabout should be considered at the intersection of Morena Boulevard and West Morena Boulevard, if feasible. If a roundabout at this location was proposed in the future, a project-level analysis would be conducted to evaluate the effect on traffic circulation and to determine feasibility, including the effect on traffic speeds.</p> <p>J-7 The public comment period for the PEIR ran from August 2, 2018, until October 1, 2018, for a period of 60 days, during which time the transportation impact analysis was available for public review and comment. The Transportation Impact Analysis is included as Appendix B to the PEIR and is available for review on the City's website at https://www.sandiego.gov/planning/programs/ceqa.</p>
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LETTER

RESPONSE

Wayne Comments, Page 3

3. There Is No Ridership Study to Support the Plan's Extreme Density

J-8

The Transit-Oriented Development Enhancement (TODE) program is used by the Plan to justify the extreme densification in the vicinity of the two trolley stations. (Page 84.) The Plan argues that the TODE program "creates transit-oriented development that supports the implementation of the CAP." While unstated, the Plan assumes that residents of the high density areas will regularly use the trolley instead of vehicles. Indeed, at the December 2016 meeting of the Committee, a development concept was presented based on that theory to allocate less than one parking space per dwelling unit.

What is lacking is any study to show that residents in the TODE areas will rely on the trolley for basic transportation. No ridership study has been presented to support this. If it is not the case, then there is no justification to concentrate housing at the stations – densification could be anywhere.

Two things suggest the Plan's foundation is not valid. First, there is already densification along nearby Friar's Road where there is an existing trolley line. In this area of dense housing, the level of service of Friar's Road is deficient. This strongly suggests not only will extreme densification not only not reduce vehicle use, but it will worsen traffic. A second factor is that 100 foot dwellings in the TODE area require steel frame construction, which is an expensive type of building. Instead of affordable housing, the extreme densification with 100 foot buildings will create high rise, high cost housing. People who can afford high rents typically will own two or more cars per dwelling units. High rise housing will worsen traffic and not contribute to the goals of the CAP.

Until a ridership study can be presented that studies trolley usage by residents of comparable developments, such as those that are 100 feet in height, there is no way to justify the extreme densification proposed under the TODE program.

4. The Plan Does Not Provide for Needed Infrastructure

J-9

It is a fiction that in-fill development can be done on the cheap without providing the improved infrastructure it demands. San Diego has already paid for this fallacy. In-fill development was the mantra in the 1960s and 1970s, when single family units in Normal Heights and North Park were demolished to make room the multi-family housing, but water capacity was not increased. In 1985 a fire started in Mission Valley and raced up the canyon wall. Firefighters responded to the inferno, but found water pressure was lacking because of the increased number of dwellings using the same water pipes that were designed for single family homes. A significant part of Normal Heights burned.

J-10

The Plan acknowledges this need for increased water infrastructure, but does not resolve it. Instead, it says that "[i]mplementation of the Specific Plan *could* requires upgrades to the existing water system infrastructure to ensure adequate capacity and sufficient fire flow. (Page 77, emphasis added.) It does not show how the city would pay for the upgrades to the existing water system, nor does it impose a requirement that new development fund it. It leaves the community at risk both physically and fiscally.

J-8

The comment questions the need for the densification associated with the Transit-Oriented Development Enhancement Program and requests a ridership study be prepared to show that future residents will use transit. The City recognizes that it cannot be guaranteed that future residents will take advantage of transit; however, planning for high-density residential development near high-quality transit is a focus of the City General Plan City of Villages Strategy, the City's Climate Action Plan, and is consistent with SANDAG strategies identified in the Regional Plan. The comment also incorrectly asserts that Friars Road currently operates at a deficiency. Per Table 6.2-2, Friars Road operates at LOS B from Napa Street to Colusa Street and LOS A west of Napa Street in the existing condition.

J-9

As future development proceeds consistent with the Specific Plan, appropriate infrastructure improvements would either be required to be installed concurrent with project development, if warranted, or development impact fees would be paid to ensure infrastructure needs are funded commensurate with the demand generated by development.

J-10

As discussed in Section 6.14 of the PEIR, upgrades to sewer and water lines are an ongoing process administered by the Public Works Department and are handled on a project-by-project basis. Because future developments within the Specific Plan area would likely increase demand, there may be a need to increase sizing of existing pipelines and mains for both wastewater and water. As future development is proposed, the necessary infrastructure improvements to sewer and water infrastructure would be incorporated as part of standard practice for new development to maintain or improve the existing system to ensure adequate capacity. As noted in Section 3.3.9 of the Project Description, an Impact Fee Study (IFS) for the Linda Vista Community would be updated to include identified facility improvements in the Linda Vista portion of the Specific Plan area. Additionally, future

LETTER

RESPONSE

J-10 (cont.)

discretionary projects would be required to undergo project-specific review under CEQA, which would analyze and address any impacts associated with the installation of sewer and water infrastructure.

LETTER

RESPONSE

Wayne Comments, Page 4

5. The Plan Improperly Delegates the Council's Zoning Authority

J-11

The Plan purports to rezone the areas around the Tecolote and Morena stations to Community Village, which would allow 54 units to the acre and a maximum building height of 45 feet. (Pages 8, 24, 83.) However, it also allows, under the TOD program, density to be increased 109 units to the acre around the Tecolote Station and 73 units to the acre near the Morena station, and with respective increases of the height limits to 100 feet and 65 feet. This would be accomplished through Planned Development Permits. (Page 84.)

J-12

The more than doubling of permissible building height and density near the Tecolote station, and a significant up-zoning near the Morena station, would be subject to approval not by the City Council, but by discretionary action (presumably of the Planning Commission). The effect would be an improper delegation of the Council's legislative authority to an unelected body. If the Planning Department intends, as it clearly appears it does, to have the area dramatically densified and the height limit raised, it should identify the City Council as the only entity with the authority to authorize it.

6. The Plan Does Nothing to Alleviate the Shortage of Affordable Housing

J-13

San Diego has a lack of affordable housing for middle income people. There are subsidies available for low income individuals, and a plethora of housing for the elite, but the middle class is being forced out of the housing market. The trolley represents a billion-dollar investment of public funds, and the public should have something to show for it. The Plan does nothing to address the shortfall.

By way of example, a one-bedroom apartment in the transit oriented housing development at Napa and Linda Vista Road rents for about \$2,100 per month. Using the HUD standard that a family should not pay more than 30% of its income for housing, this requires an annual income of \$84,000. This is well above the San Diego median. Notably, this development is not the type of high rise, high-cost units called for by the Plan.

The Plan does not provide for affordable housing. As written, it would allow developers to buy out of the inadequate ten percent that they are required to provide. In fact, where there is such a large public investment as is going into the trolley, the affordability requirement should be raised to at least forty percent, and ways should be devised to prevent developers from buying out of it.

As previously discussed, high rise housing is high-cost housing that is unaffordable for most San Diegans. Instead, the Plan appears designed to have the trolley deliver a windfall to property owners in the vicinity of the two stations by monetizing an up-zoning of their property. The public deserves better for its billion-dollar investment.

7. The Plan Greenwashes Overdevelopment and Unaffordable Housing

J-14

The Plan purports to implement the CAP (see, for example, pages 1, 5, 67, 71, 72, 73) but, in fact, pays lip service to it while imposing over-development that violates the Vision Statement and Guiding Principles of "density that [is] compatible with the existing neighborhoods" and does not alleviate the

J-11

This comment restates information from the project description; no response is required.

J-12

Projects participating in the Transit-Oriented Development Enhancement Program requesting the density increases referenced in the comment must be consistent with the Specific Plan Urban Design and Mobility policies and conform with the requirements set forth in Section 143.0402 of the LDC for Planned Development Permits and may be approved only if the decision maker makes the findings in LDC Section 126.0604(a). This decision would be made in accordance with Process Three and the decision may be appealed to the Planning Commission in accordance with LDC Section 112.0506. This comment does not suggest an inadequacy in the analysis of the PEIR.

J-13

The Specific Plan identifies areas where increases in residential densities would be allowed near existing and planned trolley stations, but does not propose any specific development project or affordable housing development. Future development proposals will originate from private developers. The Specific Plan is intended to provide development at intensities that would allow for a range of housing affordability levels to be accommodated. This comment does not suggest an inadequacy in the analysis of the PEIR.

J-14

The Specific Plan is intended to provide policy guidance applicable to future development. Various other City documents and codes such as Building Codes, the Land Development Code and the CAP Consistency Checklist provide mandates for future development that support sustainable design and energy and water conservation. This comment does not suggest an inadequacy in the analysis of the PEIR.

LETTER

RESPONSE

Wayne Comments, Page 5

shortage of affordable housing. This greenwashing is evident from the Plan's failure to mandate sustainable design or conservation.

While the Plan is directory regarding increased density and height limits, it uses advisory language, at best, about sustainable design:

It encourages, but does not require, the installation of solar energy generation systems;

It encourages, but does not require, implementation of wind energy generations systems;

It encourages, but does not require, adaptive reuse of existing buildings to increase energy efficiency;

It discourages, but does not prohibit, the use of turf in new ornamental landscaping, and strongly encourages, but does not require, replacing ornamental turf with water-wise landscaping;

It encourages, but does not require, the use of graywater reuse systems for landscape irrigation.

(Pages 67-68.)

Similarly, in discussing conservation, the Plan also uses advisory language:

It encourages, rather than requires, adherence to LEED standards for construction;

It encourages, rather than requires, implementation of energy and water efficient measures for commercial uses;

It encourages, rather than requires, new development and building retrofits to incorporate as many water-wise practices as possible.

(Page 74.)

Implementation of the CAP requires sustainable design and conservation, not the "encourage" language of the Plan. The Plan appropriates the credibility of the CAP to impose overdevelopment and unaffordable housing. It is classic greenwashing.

8. Conclusion

J-15

The process that led to the Plan is a model of how community planning should not be conducted. It makes a mockery of community input and further convinces the public that its participation is futile. There is no publicly available traffic study to gauge traffic impacts, no ridership study to judge whether extreme densification in this area is rational, the plan ignores the needs for adequate infrastructure to meet increased demand, it improperly delegates the City Council's zoning authority, it fails to address San Diego's massive affordable housing crisis, but instead provides a bonanza to existing landowners, and misappropriates the CAP to greenwash these deficiencies.

J-15

This summary comment is noted and responses to the general issues raised are addressed in previous responses to this letter.

LETTER

RESPONSE

Wayne Comments, Page 6

J-16 At a minimum there should be an extension of the comment period to consider the Plan in light of traffic and ridership studies. However, based on the faulty consultation process, the Planning Department should start over and truly engage the community in a collaborative process.

J-17 We understand that the trolley will change the area, and we want the change to be for the better. We welcome mixed use development, some additional density, infrastructure to meet the need that increased density imposes, and affordable housing. That is not what the Plan delivers. The public's billion-dollar trolley investment should provide benefits for all.

Sincerely,

HOWARD WAYNE

Attachment: Minutes

J-16 As previously noted, the public comment period for the PEIR ran from August 2, 2018, until October 1, 2018, for a period of 60 days and included public review of the Transportation Impact Analysis.

J-17 Concluding comment noted.

LETTER

RESPONSE

Letter K

From: Sharon Griffin
To: [PLN_PlanningCEQA](#)
Subject: Morena Corridor Specific Plan 582608/SCH No. 2016101021
Date: Wednesday, August 22, 2018 3:15:26 PM

- K-1 I will be out of town for a few weeks but wanted to let you know I'm still in on the fight for all our planning efforts over the last three plus years. This paragraph is in regard to the planning group's request for a pedestrian bridge linking Bay Park to Mission Bay. I dare Michael Prinz or the mayor to push a wheelchair passenger (their mother or grandmother) over the bridge to Mission Bay and back. How about a child with a family group going over to ride at the bay? (Be sure to make funeral arrangements before you go). If we ever get agreement for a bridge that is vehicle-free, we will need ramps at both ends for ADA access. UCSD Healthy Aging sessions through the medical school and my interior design background sing the praises of "age friendly" communities, the city needs to get on board.
- K-2 The other great concern I have is the hastily thrown together and passed, Pure Water Program. Although this horse may have already left the gate, I think public feedback sessions were not publicized very well and now it's probably a done deal. In late July the UT sent out a newspaper insert about being prepared for emergencies. Running the Pure Water pipeline through Rose Canyon fault zone seems like extremely poor planning. Shifting the pipeline a bit east to run up the freeway seems much more prudent. Why would planners think that wastewater piping should run on a fault line? Hello wastewater bay contamination, neighborhoods exposure to waste contamination, rail lines impact, etc. Did city planners and Pure Water planners ever meet or do they function in isolation from all concerns?
- K-3 The most frustrating thing about years of meetings is that the city asked for community planning and then it seems like the joke's on us ... they really don't care.

Sharon Griffin

- K-1 The Specific Plan includes policies supporting improved pedestrian access. As noted in Section 5.2, Transportation and Circulation, of the PEIR, the Specific Plan identifies policies to coordinate with Caltrans to provide bridge connections from the Specific Plan area to Mission Bay Park and improve cyclist mobility over the Clairemont Drive/East Mission Bay Drive and Sea World Drive/Tecolote Road Bridge. Ultimate construction of a bridge would require further feasibility analysis including site-specific environmental analysis.
- K-2 The comments are regarding the Pure Water Program, which is not the subject of the PEIR; no further response is required.
- K-3 Comment noted. This comment does not suggest an inadequacy in the analysis of the PEIR.

Letter L

GEORGE HENDERSON
**3151 Driscoll Drive
San Diego, CA 92117**
**858-752-2016
george.henderson@gmail**

August 22, 2018

(hand delivered)

Rebecca Malone, Environmental Planner
City of San Diego Planning Department
9485 Aero Drive
MS413
San Diego, CA 92123

(email)

PlanningCEQA@sandiego.gov

Transmittal of Comments

**Morena Corridor Specific Plan Draft PEIR
Project No: 582608 SCH No. 2016101021**

Dear Ms. Malone:

L-1 My comments regarding the Morena Corridor Specific Plan Draft PEIR are attached. Please do not hesitate to contact me for discussion or clarification.

Sincerely,

George Henderson

cc: Naveen Waney, Chair, Clairemont Community Planning Group
Nick Reed, Vice-Chair, Clairemont Community Planning Group
Margie Schmidt, Chair, CCPG Ad-hoc Sub-Committee for Morena Corridor Specific Plan
Howard Wayne, Chair, Linda Vista Planning Group
Laurie Zapf, San Diego City Councilperson, District 2
Marc Schaefer, District 2 council Representative to Clairemont

L-1 Introductory comment noted.

Morena Corridor Specific Plan Draft PEIR

Comments by: George Henderson
3151 Driscoll Drive
San Diego, CA 92117

August 22, 2018

INTRODUCTION

- L-2 The City of San Diego has proposed a Specific Plan for the Morena Corridor Area. Its purpose is to "Establish a transit-oriented development adjacent to the future Tecolote Road Trolley Station and the existing Morena/Linda Vista Trolley Station." City Planners have targeted land parcels for intense housing development.

Regrettably the proposed redevelopment comes at a significant and unmitigated cost to the environment. Although the proposal would anecdotally have us believe that alternative modes of transportation will eventually become popular, there is no data presented that would provide an expectation of success. To the contrary, all evidence proves an expectation of harm to the Linda Vista and Clairemont neighborhoods. Pollutants will plague our citizens, the neighborhood will lose 7,000 jobs, and the entire region will suffer from purposely worsened traffic conditions.

- L-3 The PEIR for this specific plan fails to report the unmitigated consequences of the City's proposed Balboa Station Specific Plan, which is immediately adjacent. It doesn't require special training to recognize the overlap of significant environmental impacts of the two specific plans. Impact of noise and air pollution will be additive; roadways that are already failing will have levels of service reduced to levels far below failing.

- L-4 A massive technical document like this PEIR is indecipherable to most residents. In my opinion, the opportunity for public comment is being fulfilled to the minimum extent allowable under the law. Meaningful, educated response would require a series of facilitated workshops to allow for informed decision making.

This Morena Corridor Specific Plan and its PEIR have many shortcomings. These need to be addressed, or ideally the project should be re-imagined, before approval.

- L-5 Following are specific comments that originate from the newest version of the Morena Corridor Specific Plan (released August 2018) and its draft Program Environmental Impact Report (PEIR — released August 1, 2018). The two documents are inseparable; the Plan information is also included in the PEIR but it's more difficult to find. Although I've provided paragraph and or page references as landmarks, my comments may be applicable to multiple paragraphs or tables that appear at various locations throughout the document and its appendices.

Respectfully submitted,

- L-2 This comment makes general statements unsubstantiated by facts and does not suggest an inadequacy in the analysis of the PEIR; thus, a detailed response is not warranted.

- L-3 The PEIR includes an analysis of cumulative impacts associated with traffic, noise, and air quality within Sections 6.2, 6.3, and 6.4, respectively. Specifically, the analysis of transportation impacts addresses build-out of the proposed project and is a cumulative analysis by nature because it considers changes to roadway configurations and future volumes on roadways based on build-out of planned land uses within all areas that would contribute traffic to roadways within the study area.

With respect to the noise analysis, noise impacts for the Specific Plan are cumulative in nature because they consider noise and vibration impacts associated with build-out of the entirety of the Specific Plan area. Cumulative noise impacts originating outside of the Specific Plan area were found to be less than significant because noise impacts associated with build-out of neighboring communities would be localized in nature and subject to General Plan policies, noise ordinance requirements, and Title 24 standards relating to noise limitations.

- L-4 The public review period for the PEIR occurred from August 2, 2018 through September 17, 2018 for a time period of 45 days, as required by CEQA Section 15105. The public review period was extended by 14 days beyond the required review period, and closed on October 1, 2018.

- L-5 Comment noted. This comment does not suggest an inadequacy in the analysis of the PEIR.

LETTER

RESPONSE

LETTER		RESPONSE
<p>George Henderson Comments Morena Corridor Area Specific Plan — Draft PEIR</p>		
L-6	<p>1 Specific Plan 1.3 “Guiding Principles” are violated.</p> <p>1.1 <i>“Ensure that new development respects general mass, volume, and scale of the existing built environment.”</i> A proposal to increase building heights to one hundred feet hardly qualifies as “respect” for what currently exists. This guiding principle has been violated.</p>	L-6 Comment noted. This comment does not suggest an inadequacy in the analysis of the PEIR.
L-7	<p>1.2 <i>“Improve access to Mission Bay Park”</i> The Clairemont community envisioned a bridge. The plan creates a circuitous bicycle route that might eventually take a rider to somewhere near Fiesta Island. The intentions of this guiding principle have been violated.</p>	L-7 Comment noted. The comment does not suggest an inadequacy in the analysis of the PEIR.
<p>2 Specific Plan 1.5 “Relationship to Other Planning Documents”</p>		
L-8	<p>2.1 The proposed <i>Balboa Avenue Station Area Specific Plan</i> pre-dates these Morena Corridor Specific Plan documents. Both specific plans are under consideration for approval. As the plan areas are immediately adjacent, it is unconscionable that no data is available that combines their environmental impacts. Decision-makers and the communities of San Diego are at risk.</p>	L-8 See response to comment L-3.
<p>3 Specific Plan 1.6 “Planning Process” overstates community engagement.</p>		
L-9	<p>3.1 The proposed Morena Corridor Specific Plan bears little resemblance to input received from either the Linda Vista or Clairemont communities. To the contrary, the entire process appears carefully choreographed to satisfy the letter of the law, rather than seek any true community partnership. For instance, no one in any community meeting requested development density of 109 dwelling units per acre.</p>	L-9 Comment noted. This comment does not suggest an inadequacy in the analysis of the PEIR.
L-10	<p>3.2 Removal of “Land Use” from the purview of Clairemont’s Sub-Committee was a clumsily implemented idea that caused many to question if the City was actually listening.</p>	L-10 Comment noted. This comment does not suggest an inadequacy in the analysis of the PEIR.
<p>4 Specific Plan 2.1 Land Use Designations</p>		
L-11	<p>4.1 Table 2-1: Census data from 2010 does not reflect the impact of relaxed development rules regarding “granny flats”.</p>	L-11 Comment noted. This comment does not suggest an inadequacy in the analysis of the PEIR.
<p>5 Specific Plan 2.4 Morena Station District</p>		
L-12		L-12 Comment noted. This comment does not suggest an inadequacy in the analysis of the PEIR.
<p>August 22, 2018 Page 2 of 13</p>		

LETTER

RESPONSE

George Henderson Comments
Morena Corridor Area Specific Plan — Draft PEIR

	5.1	I like the concept of street extensions to complete a grid network near the intersection of Linda Vista Road and Morena Boulevard. The proposed improvements should create an environment that is safer for all users.
	6	Specific Plan 3.2 Mobility Improvements
L-13	6.1	The proposed downgrade of Morena Boulevard from a four-lane major arterial highway to a three lane collector road, thereby creating room for a Class IV two-way cycle track is controversial. A northern segment of the same concept was proposed as part of the Balboa Station Area Specific Plan. This decision should not be made in a piecemeal basis; it needs to be part of a larger community mobility plan. It is my understanding, from Michael Prinz' comments on August 13, 2018 that this is a non-binding recommendation for the Clairemont Community Plan Update.
L-14		See also comments below about the traffic study. SANDAG has temporarily closed one southbound lane on Morena Boulevard to accommodate trolley construction. The community has repeatedly asked that traffic measurements be conducted now, so that real numbers can be used rather than projections. You can literally drive down the street at 4:30PM and see the impacts.
	7	Specific Plan 8.9 Implementation Action Plan
L-15	7.1	The City's funding procedures are certainly arcane and indecipherable to this reader. I would offer the following ethical principles: 1. Do no harm. 2. Success of a project is no excuse to cause unmitigated harm to a citizen, or that citizen's community. 3. Mitigation enables change. 4. Create the mitigation before harm can occur.
	8	PEIR Executive Summary: Areas of Controversy
L-16	8.1	<i>"Whether this PEIR adequately describes the environmental impacts of the proposed project?"</i> Arguably NO. • As described below the VMT Analysis is fatally flawed. • As described below, the noise analysis is flawed. • As described below, the entire analysis is flawed mathematically. • As described above, the PEIR ignores the combined environmental impact of the adjacent Balboa Station Specific Plan.

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- L-13 Comment noted. This comment does not suggest an inadequacy in the analysis of the PEIR.
- L-14 A request for traffic measurements associated with lane closures along Morena Boulevard associated with trolley construction are beyond the scope of this PEIR and would not necessarily reflect actual conditions of the planned roadway network because the current closure is associated with a construction project and the closure does not reflect the ultimate roadway configurations proposed in the Specific Plan.
- L-15 This comment refers to the Specific Plan Section 8.9, Implementation Action Plan, and does not suggest an inadequacy in the analysis of the PEIR.
- L-16 This comment summarizes the commenters concerns with the analysis contained within the PEIR, but does not provide specific details related to the PEIR analysis. Responses are provided to specific issues raised in the subsequent responses. Also, see response to comment L-3.

LETTER

RESPONSE

George Henderson Comments
Morena Corridor Area Specific Plan — Draft PEIR

- L-17 8.2 *"Whether the benefits of the proposed project override the environmental impacts that cannot be feasibly avoided or mitigated to a level of insignificance?"*
Arguably NO.
Failure to mitigate known significant damage to the environment is unconscionable. Use of the phrase "Significant and Unavoidable" should not be in the vocabulary of City officials. In all cases, "unavoidability" is a conscious decision based upon budget, expediency, and/or flawed philosophy.
- L-18 8.3 *"Whether there are any alternatives to the proposed project that would substantially lessen any of the significant impacts of the proposed project and achieve most of the basic project objectives?"*
Arguably YES.
The "Low Option" has essentially the same result as the "Medium Option", yet it is dismissed without serious consideration.
- L-19 The "No Option" is not seriously discussed, although it clearly causes the least environmental damage and requires zero mitigation.
- L-20 Sometimes a project is envisioned and actively pursued. Then at some point in time, serious reckoning reveals that flaws have been uncovered and the idea must be scrapped. Successful financial managers know that money already spent is a "sunk cost" and has no future value. Every day, a viable project must demonstrate that the next dollar is worth spending. Perhaps the Morena Corridor Specific Plan never made sense? Perhaps it simply needs to be freshly re-imagined?
- 9 **PEIR Executive Summary: Table S-1**
- L-21 9.1 Land Use: "
The project is also consistent with all goals and policies of the Clairemont Mesa Community Plan ..."
This statement may be true if the project complies with the Clairemont Mesa Community Plan from 1989. But it is premature to speculate if it is compliant with the upcoming Clairemont Community Plan Update.

- L-17 The purpose of the PEIR is to disclose potential impacts of the project to the public. Consistent with CEQA Guidelines, potential impacts are identified, including whether impacts may be significant and unavoidable. This comment does not suggest an inadequacy in the analysis of the PEIR.
- L-18 Chapter 10 of the PEIR provides a "reasonable range of alternatives" pursuant to State CEQA Guidelines Section 15126.6. The alternatives included in the PEIR informs decision making and public participation because there is enough variation amongst the alternatives that provide a reasonable range. As required under CEQA, the alternatives would avoid or minimize significant impacts associated with the project while also meeting the project objectives. The alternatives are compared to the impacts of the project and are assessed relative to their ability to meet the basic objectives of the project.
- L-19 It is assumed that the "No Option" is referring to the No Project Alternative described in Section 10.1 of the PEIR. The No Project/Adopted Plan Alternative is evaluated to the degree necessary for a project alternative consistent with the CEQA Guidelines and offers adequate opportunity for a contrasting comparison between the alternative and the proposed project. See, also, response to comment L-18.
- L-20 Comment noted. This comment does not suggest an inadequacy in the analysis of the PEIR.
- L-21 The analysis of policy consistency contained in PEIR Section 6.1.3 under Issue 1 addresses consistency with adopted plans and policies and does not address consistency with the upcoming Clairemont Community Plan update as that plan is not finalized.

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RESPONSE

George Henderson Comments
Morena Corridor Area Specific Plan — Draft PEIR

L-22	9.2 <u>Transportation and Circulation:</u> (Reference the discussion in #7 above.)
L-23	<ul style="list-style-type: none"> Impacts 6.2-1, 6.2-3 & 6.2-5 are identified mitigators which the city refuses to implement. Impacts 6.2-8, 6.2-9, & 6.2-10 are identified mitigators which will not be done in the foreseeable future because it is inconvenient for the City to cooperate with CalTrans or SANDAG.
L-24	<ul style="list-style-type: none"> We have seen similar excuses in the PEIR for the Balboa Station Specific Plan. Failure to mitigate would indicate failure, not success, of this specific plan. <u>No occupancy permits for projects within the Specific Plan Area should be issued unless and until these mitigators are installed.</u>
L-25	<ul style="list-style-type: none"> Impact 6.2-10 also includes an embarrassingly speculative comment about some proposed facilities that "might help". Speculation is inappropriate in a professional document like this PEIR.
L-26	9.3 <u>Noise:</u> The Specific Plan's noise profiles indicate areas that are already experiencing uncomfortably loud surroundings. Build-out of the specific plan would increase the already uncomfortable ambient noise by 3dB to 5dB, which is characterized as " <i>less than significant</i> ". Discretionary development will have specific review processes, but the Specific Plan opens the door to many projects that will require only ministerial review.
L-27	<p>I had to refresh my memory of logarithm mathematics to understand the health risks of the increased noise level.</p> <p>Hearing damage is most often caused by continued exposure to loud noise. Pressure imposed upon the eardrums by sound is measured in decibels. A 3dB increase means that sound pressure has doubled. A 5dB increase indicates tripling. Sadly, although damage is occurring, the ear can barely discern a 3dB change.</p> <p>This increase in damaging sound pressure hardly seems "insignificant" when you understand the measurements.</p> <p>Those people who become residents in Tecolote Village will not be happy with outdoor traffic noise. But they'll get used to it after a while, ... after they've suffered permanent hearing loss.</p>

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- L-22 The referenced mitigation measures would be inconsistent with the mobility goals of the Specific Plan, and thus, were not included in the Specific Plan.
- L-23 The referenced mitigation measures would be under the authority of Caltrans. Improvements that are outside of the City's authority cannot be guaranteed to be implemented and are, therefore, found to be significant and unavoidable. Nonetheless, mitigation measure 6.2-10 would require the City to coordinate with Caltrans to address ramp capacity at impacted on-ramp locations.
- L-24 Comment noted. This comment does not suggest an inadequacy in the analysis of the PEIR.
- L-25 Mitigation measure 6.2-10 would require the City to coordinate with Caltrans to address ramp capacity at impacted on-ramp locations; however, as described in response to comment L-23, even with implementation of mitigation measure 6.2-10, impacts would be significant and unavoidable, as improvements are outside of the City's jurisdiction.
- L-26 PEIR Section 6.3.4, Issue 1 addresses ambient noise. As described in this section, the threshold for addressing ambient noise is as follows:
- "A significant impact would occur if build-out of the Specific Plan would result in traffic noise levels that exceed the significance thresholds for traffic noise (see Table 5-2). Per the City's significance thresholds, if the proposed project is currently at or exceeds the significance thresholds for traffic noise, then an increase of more than 3 decibels (dB) is considered significant. If an area is currently exposed to noise levels that do not exceed the land use compatibility guidelines and noise levels were to result in greater than a 5 dB(A) increase, then the impact would be considered significant."

LETTER

RESPONSE

	<p>L-26 (cont.)</p> <p>As shown in PEIR Table 6.3-4, the increase in ambient noise due to implementation of the Specific Plan would be less than 3 dB for all roadway segments except the segment of Friars Road west of Napa Street. The PEIR analysis shows that as future noise levels relative to land uses along this roadway are compatible with City standards and the increase in noise would be less than 5 dB, impacts along this segment would be less than significant. This analysis considers both discretionary and ministerial projects and shows that implementation of the Specific Plan would not result in significant ambient noise impacts. See also response to comment L-27.</p> <p>L-27</p> <p>As described in PEIR Section 2.3.3.2.c., under controlled conditions in an acoustics laboratory, the trained, healthy human ear is able to discern changes in sound levels of 1.5 dB(A) under certain conditions. Outside such controlled conditions, the average healthy ear can barely perceive a change of 3 dB(A); a change of 5 dB(A) is readily perceptible; and an increase (decrease) of 10 dB(A) sounds twice (half) as loud. The comment appears to indicate that hearing damage can occur even where noise level increases are imperceptible; however, the comment does not provide any factual basis for the comment. Thus, a more detailed response cannot be provided.</p>
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LETTER

RESPONSE

LETTER		RESPONSE
<p>George Henderson Comments Morena Corridor Area Specific Plan — Draft PEIR</p>		
L-28	<p>9.4 <u>(Construction) Noise & Vibration:</u> The analysis assumes that projects' peak noise generation generally lasts one year, and normally consists of pile driving plus operation of any three major pieces of power equipment. The Specific Plan's large development parcels would most likely have more than one project generating simultaneous noise. New residents will take occupancy while their homes are surrounded by heavy construction.</p>	<p>L-28 As detailed in the PEIR Section 6.3, construction activities related to implementation of Specific Plan would potentially generate short-term noise levels in excess of 75 dB(A) L_{eq} at adjacent properties. While the City regulates noise associated with construction equipment and activities through enforcement of its noise ordinance standards (e.g., days of the week and hours of operation) and imposition of conditions of approval for building or grading permits, there is a procedure in place that allows for variance from the noise ordinance. Due to the highly developed nature of the Specific Plan area with sensitive receivers potentially located in proximity to construction sites, there is a potential for construction of future projects to expose existing sensitive land use to significant noise levels. While future development projects would be required to incorporate feasible mitigation measures, including mitigation measure 6.3-1, impacts would remain significant and unavoidable due to the close proximity of sensitive receivers to potential construction sites.</p>
L-29	<p>The exposure of sensitive auditory receptors to excessive noise levels is listed as a "Significant and Unavoidable" impact of the Specific Plan. I find it hard to accept that conclusion. Vague references to "feasible mitigation measures" are obviously inadequate; buildout of this Specific Plan would likely require a dedicated responsible noise "Czar".</p>	
L-30	<p>9.5 <u>Visual Effects and Neighborhood Character:</u> The obstruction of public views and alteration of neighborhood character that would occur with adoption of TODEP (Transit Oriented Development Enhancement Program) are correctly identified as "Significant". The document's twisted logic also calls it "Unavoidable". I call it "Unacceptable and "Easily Avoidable".</p>	
L-31	<p>9.6 <u>Air Quality:</u> The PEIR calculates and readily admits that significant increases of emissions are unavoidable under this Specific Plan.</p>	
L-32	<ul style="list-style-type: none"> • Since density is increased, people move into the Plan area. They bring their emissions with them; concentrating their impact in Linda Vista and Clairemont as opposed to distributing it throughout the county. 	<p>L-29 See response to comment L-28.</p>
L-33	<ul style="list-style-type: none"> • No evidence is offered that alternative transportation will significantly impact pollution; in fact the emissions caused by operating the transit system seem to have been ignored. 	
L-34	<ul style="list-style-type: none"> • Traffic pollutant analysis fails to incorporate increased emissions caused by idling cars. Increased idling time is the direct result of failure to mitigate traffic jams caused by this Specific Plan. 	
	<p>9.7 <u>Energy - Transportation Energy Use:</u> "... per-capita vehicle fuel use is expected to decline when the proposed project becomes operational." This statement is misleading and irrelevant. Per-capita measures are of no interest. Absolute total emissions are what we breathe, and we will be breathing more pollution. Much of that pollution will come from vehicles, and these vehicles will belong to the Specific Plan Area's residents.</p> <p>Additional transportation energy will be wasted by motorists who are impacted by unmitigated traffic congestion that results from this Specific Plan.</p>	<p>L-30 Comment noted. This comment does not suggest an inadequacy in the analysis of the PEIR.</p> <p>L-31 Air quality impacts are generally assessed at the air basin level and not individual communities because air emissions do not stay confined to a specific community due to air flow. For a discussion of air quality impacts, see Section 6.4 of the PEIR.</p>
<p>August 22, 2018</p>		
<p>Page 6 of 13</p>		

LETTER

RESPONSE

	<p>L-32 Emissions associated with the use of transit is not evaluated in this PEIR as the project does not involve construction of transit facilities; rather, it identifies appropriate land uses in proximity to high-quality transit. However, it is widely recognized that a shift to the use of alternative transportation over single occupancy vehicles would reduce vehicle miles traveled (VMT) and automobile emissions. For trains and buses, the amount of energy used per passenger is far less than fuel consumed by single-occupancy vehicles. With respect to trolley-related emissions, it is noted that the trolley is operated on electricity.</p> <p>L-33 Section 6.4.3 of the PEIR includes an analysis of impacts related to sensitive receptors due to localized carbon monoxide hot spots associated with idling traffic. Carbon monoxide hot spots occur nearly exclusively at signalized intersections operating at LOS E or F. Based on the Transportation Impact Analysis prepared for the Specific Plan, the only signalized intersection that would operate at a LOS E or F is the intersection of Denver Street and Clairemont Drive, which is projected to operate at LOS F during the morning and evening peak hours. However, the traffic volume at this intersection would be less than 31,600 vehicles per hour, which is below the screening threshold for a potential CO hotspot. Therefore, the Specific Plan is not anticipated to result in a CO hot spot.</p> <p>L-34 Per capita evaluation of energy use and vehicle fuel is an appropriate measurement of energy consumption because it can measure per capita reductions in energy consumption associated with the use of transit or implementation of energy-efficiency measures, rather than providing a mass emission evaluation that would primarily show increases in energy consumption associated with population growth. A mass emission evaluation would not allow energy efficiency improvements to be measured. Refer also to response to comment L-33.</p>
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LETTER

RESPONSE

George Henderson Comments
Morena Corridor Area Specific Plan — Draft PEIR

L-35

9.8 **Public Services:**
 Police, Park & Recreation, Fire Protection, Libraries, and Schools are not analyzed. Facilities, services, and capabilities are deemed adequate per Section 2.3.13.3; with decisions and facilities planning deferred to others. This seems to simply push an impending issue down the road. Population milestones should be created that will automatically trigger facility and staffing decisions.

L-36

9.9 **Public Utilities:**
 Water supply projections are based upon manageable, relatively short, droughts. Few California residents, outside of our Public Utilities Department, believe that dry conditions will only rarely persist beyond three years. Our PUD has perhaps the worst reputation of all City services. Just last month a scathing audit resulted in the hiring of a new deputy chief operating officer. I recommend that the water availability report contained in this PEIR should be reviewed and approved by the new deputy chief.

L-37

10 **Suspicious Accuracy of All Numerical Data In This PEIR**
 Numbers are presented in a way that implies impossibly extreme accuracy. There is a high likelihood that conclusions are derived in a statistically irrelevant manner. Examples follow:

10.1 (ref §2.3.8.1) Transportation emissions for 2015: Exactly 169.4 Million Metric Tons (MMT). This number implies accuracy to four significant digits. Whoever created this table of data is guaranteeing accuracy within 0.01%

10.2 (ref §2.3.8.2) Electricity [generation?] created exactly 3,116,398 MMT of emissions in 2010. Whoever created this table of data is guaranteeing accuracy within 0.000001%

10.3 (ref §2.3.8.3) Exactly 100,093 MMT of emissions will be created in the Specific Plan area during 2018. Whoever created this table of data is guaranteeing accuracy within 0.0001%

10.4 In the above examples, the data is likely accurate within about +/- 5%. That level of confidence would be better presented as: 170 MMT; 3,100,000 MMT; and 100,000 MMT respectively.
Conclusions of this PEIR may be flawed if the data is presented with exaggerated accuracy. There is a good chance that impacts of significant changes to emissions and traffic are being understated due to rounding errors.

L-35

Analysis of impacts to public services (police protection, fire protection, schools, libraries, and parks and recreation) are assessed in Chapter 6.13 of the PEIR. The analysis is adequate for a program-level evaluation as there are mechanisms in place for future development to fund necessary services through Development Impact Fees.

L-36

PEIR Section 6.14.3 evaluates water supply. Appendix H of the PEIR includes a Water Supply Assessment for the Linda Vista portion of the Specific Plan area where density changes are proposed that could result in additional water demand. The Water Supply Assessment evaluates water supplies that are, or will be, available during a normal, single-dry year, and multiple-dry year (20-year) period, to meet the estimated demands of the build-out. The water supply is adequate as it considers multiple-dry year scenarios and includes projections over a 25-year period, consistent with water supply planning requirements.

L-37

The PEIR has been prepared consistent with the rules and requirements of CEQA and the State CEQA Guidelines. Data is presented in a way to provide an understandable and objective assessment of project impacts. In the manner of presenting GHG emissions, Tables 2-4, 2-5, and 2-6 summarize quantities of emissions for statewide, City, and the project area. Because CARB and City sources utilize different mathematical rounding, it does not negate the ability to compare overall emissions for each sector (i.e., transportation, residential). The overall discussion allows the reader and decision maker alike to evaluate GHG emissions at the state, City, and local (project area) levels.

George Henderson Comments
Morena Corridor Area Specific Plan — Draft PEIR

L-38

10.5 Appendix D1, which predicts Vehicle Miles Traveled (VMT), seems to purposely make light of the need for statistically relevant numerical accuracy. Conclusions are presented with numbers such as "158,367,079" while some of the data input is presented as "3.68", "43.52", "0.20", "0.001871", and my favorite "3%" ... Many calculated values involve an estimated number [of vehicles, square feet, etc] multiplied by some percentage factor. It is unlikely that the bottom line calculations for VMT are accurate within 10%. All of the inputs appear to be gross estimates. Thus, this analysis would be better described as a "guesstimate".

Use of Vehicle Miles Traveled is a deeply flawed methodology for predicting air pollutants when the project results in unmitigated damage to the smooth flow of traffic.

The methodology for predicting VMT is no better than the accuracy of input to the computer model. In this case, we don't know if the unmitigated delays were accounted for, but we do know that the accuracy of input data is inconsistent. Evidence suggests that Appendix D1, the VMT report, should not be used as a decision-making tool.

L-39

11 **PEIR 2.3.11.2 Flooding**

The Specific Plan area seems to partially fall in the 100-year flood plain and fully under dam inundation area. Climatologists predict frequent events that exceed the intensity of even 100-year storms. Does this stress the retention capabilities of our dams? Maps of flood plains seem to be included without comment in the PEIR.

L-40

12 **PEIR 3.3.7.2 "Amendment to the Clairemont Mesa Community Plan"**

(Reference my comment #6 above. Removal of Morena Boulevard traffic lanes may be recommended, but not implemented, by this Specific Plan.)

Change the text of Paragraph 3.3.7.2 as follows:

Amendment to **Recommendation for the Clairemont Community Plan Update**

"The proposed project includes an amendment to a recommendation for the Clairemont Mesa Community Plan **Update** to implement proposed mobility changes along Morena Boulevard. Specifically, Figure 22 and the Recommendations for Street Improvements Section of the Transportation Element ~~would be amended to~~ reflect the reclassification of Morena Boulevard as a 3-lane collector.

Change the text in Table 3-2 to be consistent with the above.

L-38

Data rounding in Appendix D is presented appropriately based on the values presented. Appendix D-1 describes the methodology for determining a projection of VMT with plan build-out. The analysis does not intend to provide a definite number of future VMT, rather is an estimate based on a number of factors. Additionally, the air emission estimates do take into account LOS of roadways due to the effect of congestion on emissions.

L-39

A discussion of impacts related to flooding and dam inundation is located in Section 6.11.3 of the PEIR. Impacts related to flooding and dam inundation were determined to be less than significant.

L-40

The proposed project includes the processing of an amendment to the Clairemont Mesa Community Plan to reflect the proposed mobility network presented in the Specific Plan. No revisions to the PEIR are necessary.

LETTER

RESPONSE

George Henderson Comments
Morena Corridor Area Specific Plan — Draft PEIR

L-41	13	PEIR 3.3.8 Amendment to [Linda Vista] Land Development Code I object to the removal of Linda Vista's 30-foot height overlay zone unless that change is specifically recommended by a vote of their Morena Corridor Specific Plan Ad-Hoc Sub-Committee, and all significant impacts are effectively mitigated.
L-42	14	PEIR 3.3.9 Impact Fee Study (Reference my comment #7 above.) This paragraph refers to the nearly indecipherable mystery of developer fees and Public Facilities Financing Plans. A private citizen can hardly be expected to navigate that very specialized world of municipal finance. But it is appropriate to re-state a citizens expectation of those who created this Specific Plan: Find a way to mitigate the significant impacts before <u>you</u> cause them. <u>Do No Harm!</u>
L-43	15	PEIR 5.1.6 San Diego Forward: The Regional Plan In 2004 the Regional Plan identified " <u>Urban Sprawl</u> " as an issue that needed to be managed. Those involved were certainly thinking of horizontal sprawl ... citizens who make their residences in the suburbs. Today we see a different type of sprawl — <u>skyward!</u> San Diego's downtown skyline hardly resembles what existed in 2004. This is great for those residents who crave the big city atmosphere, but that skyward momentum is now sprawling outward. Hillcrest, North Park, UTC, etc. Where will the sprawl end? Like it or not, this Specific Plan is advocating an extension of the downtown-like environment. Approval of this Specific Plan would further endanger a disappearing species ... San Diego's single family neighborhoods.
L-44	16	PEIR 5.2.2.1 SANDAG Regional Bike Plan This paragraph refers one of several reports that have been generated to espouse the vision for safe bicycle mobility. It is notable that prior recommendations for Class I or Class II bicycle paths along Morena Boulevard have now somehow escalated to a recommendation to decommission an already heavily used traffic lane.

- L-41 Comment noted. This comment does not suggest an inadequacy in the analysis of the PEIR.
- L-42 The referenced section of the PEIR describes the Impact Fee Study being prepared for the Linda Vista portion of the Specific Plan area that would provide a facility analysis to identify potential funding sources for public facilities financing. Part of this analysis results in the establishment of updated development impact fees that are paid at the time development is proposed. See also response to comment J-10.
- L-43 Comment noted. This comment does not suggest an inadequacy in the analysis of the PEIR.
- L-44 Comment noted. This comment does not suggest an inadequacy in the analysis of the PEIR.

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LETTER		RESPONSE
<p>George Henderson Comments Morena Corridor Area Specific Plan — Draft PEIR</p>		
L-45	<p>17 PEIR 5.8.3.2 City of Villages Strategy A logical flaw found can be found in many parts of the PEIR document. The author uses an indefinite premise to arrive at a certain conclusion. One example is found in the second paragraph of this section: <i>"Locating different land uses types near one another can decrease mobile emissions. Thus, the development of dense urban "villages" would generate less GHG emissions."</i> Somehow the potential of decreasing mobile emissions assures victory in the fight to reduce greenhouse gases.</p>	L-45 The referenced PEIR section is not a part of the environmental analysis, rather is a discussion of the regulatory framework applicable to greenhouse gas emissions. Trip generation assumptions for land uses in proximity to transit do take advantage of trip reductions to account for a share of trips that would use transit instead of single-occupancy vehicles. To make the referenced citation more consistent with its intended purpose, a revision to the language in Section 5.8.3.2 of the PEIR has been made to reflect the word could instead of would.
L-46	<p>18 PEIR 6.1.e San Diego River Park Master Plan This specific plan does very little to provide improved access to Mission Bay Park. The route to and from Morena/Linda Vista Transit Station is tortured for casual bicyclists and inconvenient for pedestrians. There was much discussion at public meetings regarding improved access at the Clairemont Drive Station. The existing Clairemont Drive bridge over I-5 is clearly intended for motor vehicles. This Specific Plan proposes to define bicycle lanes with delineators. That is not compatible with freeway ramps and unmitigated miles-long queues caused by this plan's density. The Clairemont community expressed clear preference for a dedicated pedestrian/bicycle bridge. This Specific Plan's authors did not deem it necessary to acknowledge the bridge idea.</p>	L-46 See response to comment L-7.
L-47	<p>19 PEIR 6.2 Transportation and Circulation</p> <p>19.1 <u>Morena Boulevard Traffic Study</u>: The traffic counts were taken in February, 2014 and October, 2015, but the traffic study was not completed until June, 2018. Arguably, much has changed during the intervening four years. In particular, thanks to SANDAG's trolley construction detour on Morena Boulevard, we now have real time visualization of the impacts caused by closure of one southbound lane. The community has repeatedly asked that traffic counts be taken during the detour. Those requests have been ignored, as <u>the plan's authors have chosen to use calculated conjecture rather than real data.</u></p>	L-47 The comment calls into question the validity of the traffic count data. The analysis utilized counts from the initial Morena Boulevard Station Area Plan Final Report (2014). These counts were validated with additional counts in October 2015 conducted in support of the Morena Corridor Specific Plan and accompanying Transportation Impact Analysis (provided as Appendix B of the Draft PEIR), and included in Appendix A of the Transportation Impact Analysis. City of San Diego standards require traffic counts be conducted within two years from the NOP of the environmental document to be deemed valid. The NOP was issued on October 7, 2016; therefore, the counts are valid. Refer also to response to comment L-14.
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LETTER

RESPONSE

George Henderson Comments
Morena Corridor Area Specific Plan — Draft PEIR

L-48

19.2 **Additive Traffic Impact of Adjacent Specific Plans:** The traffic study for this Morena Corridor Specific Plan is dated June, 2018.
 The traffic study for the Balboa Station Area Specific Plan is dated December, 2017.
 The two plan areas are immediately adjacent, their individual specific plans underwent concurrent development and are now under concurrent review. Significant traffic impacts are caused by both projects at overlapping intersections and roadway segments.
 It is inexcusable that both traffic studies ignore their additive impact upon the community. This Specific Plan offers four alternatives, while the Balboa Specific Plan has three. Twelve new iterations of existing data by the traffic engineers could help the decision makers avoid a critical mistake.

L-49

19.3 **Table 6.2-2: Roadway Segment Level of Service:** Several rows of data would appear to indicate a significant Level-Of-Service degradation. However, this table says "Not Significant" with a footnote.
"2 Intersections at the ends of the segment and peak hour arterial analysis for the same segment are calculated to operate at an acceptable LOS with the proposed project. Therefore, impacts are less than significant."
 It is difficult to accept that, theoretically, the impact upon these roadway segments are insignificant. (e.g. Morena Boulevard from Tecolote Road to Buenos will deteriorate from LOS "F" with 16,000 daily trips, to an even worse LOS "F" with 25,100 daily trips."

L-50

20 **Page 6.3-14 Noise Mitigation**
 (Refer to my comment #9.3 above)
 I was surprised to read this text:
 "... noise levels up to 65 CNEL [Community Noise Equivalent Level — a type of weighted average] for single-family residential and up to 70 CNEL for multi-family residential are considered conditionally compatible, since interior noise levels can be reduced to 45CNEL through simple means, such as closing/sealing windows and providing mechanical ventilation. Additionally, as stated in Section B of the General Plan Noise Element, although not generally considered compatible, the General Plan conditionally allows multi-family and mixed-use residential uses up to 75 CNEL in areas affected by motor vehicle traffic noise with existing residential uses."

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L-48

As stated in Appendix G of the Transportation Impact Analysis, "The calibration and model run for the Morena Corridor Specific Plan Transportation Impact Analysis (TIA) was performed in conjunction with the adjacent Balboa Station Area Plan project." Refer also to response to comment L-3.

L-49

For roadway segments that are forecasted to operate at LOS E or F with the project, the allowable increase in V/C ratio is 0.02 at LOS E and 0.01 at LOS F. If vehicle trips from a project cause the V/C ratio to increase by more than the allowable threshold, this would be considered a significant project traffic impact. Also, if the project causes a street segment that was operating at an acceptable LOS to operate at LOS E or F, this would be considered a significant impact. In addition to this general methodology, the PEIR further evaluated potential impacts using the Highway Capacity Manual arterial analysis to provide a more accurate indication of LOS. With respect to the roadway segments of Morena Boulevard from Knoxville Street to Linda Vista Road (the roadways indicated in Table 6.2-2 with footnote 2), the peak hour arterial analysis shows an overall acceptable LOS (see peak hour arterial analysis worksheets in Appendix H of the Transportation Impact Analysis, Appendix B of the PEIR). Therefore, the five study segments of Morena Boulevard from Knoxville Street to Linda Vista Road would operate acceptably and result in less than significant impacts.

L-50

This comment restates existing General Plan noise compatibility standards and does not suggest an inadequacy in the analysis of the PEIR.

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RESPONSE

George Henderson Comments
Morena Corridor Area Specific Plan — Draft PEIR

L-51

20.1 To put this in the context of Table 2-1, 45 dB(A) is relatively quiet. (Imagine a dishwasher running in the next room.) 65 dB(A) would be like someone shouting at you, or running a vacuum cleaner about 12 feet away. 75 dB(A) is like standing five feet from a blender.

Clearly, not many of these new residents will be able to enjoy the outdoors. Imagine this difficult choice:
 Free ventilation with open windows, but risk long-term hearing loss.
 -or-
 Use those “simple means” ... mechanical ventilation/air conditioning with its high electrical bills.

L-52

20.2 Other pollutants Caused By Excessive Noise
 High outdoor noise levels in residential areas create airborne pollutants and greenhouse gases! Electricity must be generated to power air conditioning systems. The authors of this document failed to connect that dot.

L-51

Comment noted. This comment does not suggest an inadequacy in the analysis of the PEIR.

L-52

Excessive noise does not create airborne pollutants and greenhouse gases. GHG emissions associated with building energy use, which include air conditioning, is addressed in Section 6.8 of the PEIR. Specifically, the methodology used to estimate building energy emissions is discussed on Page 6.8-2 and the emissions are summarized in Table 6.8-2 on page 6.8-5.

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George Henderson Comments
Morena Corridor Area Specific Plan — Draft PEIR

L-53

21 6,700 JOBS LOST IF THIS SPECIFIC PLAN IS IMPLEMENTED

Page 8-2, 2nd Paragraph: I was surprised and shocked to read this bit of data that was buried within a page of text near the end of this PEIR:

"The current population within the Specific Plan area is estimated to be 2,659 residents and 10,155 employees. Under the adopted Clairemont Mesa and Linda Vista community plans, build-out within the Specific Plan area is estimated to result in a population of approximately 3,930 residents and 10,922 employees. With the proposed project, the population would increase within the Linda Vista Community Plan area to an estimated 14,000 residents and 4,181 employees at full build-out."

This was the first place I noticed any mention of employment impacts. If I understand that data correctly, "Employment" should have been It should have been highlighted in at least one of the many summaries of "Significant and Unmitigated" impacts.

This important information seemed to be hidden as a sort of "word puzzle", while other, less significant data, was more clearly presented in a tabular format. Therefore, I created this one:

EMPLOYMENT FACTS:				
	Existing Today	Already Approved	Specific Plan	Net Added (Lost)
Population	2,659	3,930	14,000	10,070
Residences	996	1,386	5,458	4,072
Employees	10,155	10,922	4,181	(6,741)

In plain English, the net result of this Specific Plan will be to build 4,000 new residences and demolish 6,700 jobs!

L-54

**Obviously, this version of "Mixed Use" is not an effective means to create employment in this Specific Plan area.
"Transit Oriented Development" will not improve our environment or reduce traffic; thousands of people would need to find work and commute to jobs outside of the neighborhood**

This data raises significant questions about the entire premise of the Morena Corridor Specific Plans. The current draft should be rejected. The concept could be dropped, or alternatives could be reimagined.

L-53

Pursuant to CEQA Guidelines 15126.2(d), the PEIR addresses whether the project would accelerate growth that could significantly affect the environment. As discussed in Chapter 8, implementation of the proposed project would create employment opportunities throughout the districts intending to "facilitate the economic well-being of locally owned and operated businesses and create ample job opportunities for residents in the Specific Plan area. These policies serve to facilitate expansion and new growth of high-quality employment opportunities with access to transit" (PEIR Chapter 8). The table provided in this comment is a misinterpretation of information presented in the Specific Plan. The Specific Plan is estimated to result in an increase in 4,181 employees, not a loss of employees.

L-54

These concluding remarks are noted.

August 27, 2018

Letter M

To: Rebecca Malone, Environmental Planner, City of SD Planning Dept.

Michael Prinz, Senior Planner, City of SD Planning Dept.

From: Martin Habel, Extremely Concerned Resident of Bay Park

CC: James LaMattery

Raise The Balloon

Subject: Comments to PEIR, Morena Corridor Specific Plan

I. Initial Comments

M-1

I have reviewed the Draft PEIR for the Morena Corridor Specific Plan, Project # 582608 released Aug 1, 2018 and the final Morena Corridor Specific Plan dated Aug 2018 and have grave concerns on both documents. Since the PEIR is reviewing the impact of the Morena Corridor Specific Plan, they are closely coupled together and therefore I am commenting on both documents in this letter.

Most people will agree that San Diego needs additional housing for all incomes. While the City of San Diego General Plan adopted in 2008 incorporates the City of Villages strategy, and while the City must comply with the Climate Action Plan, CAP, The Morena Corridor Specific Plan and the PEIR ignore and trample the Vision and Guiding Principles of the Morena Corridor Specific Plan shown below.

M-2

1.2. VISION

Enhance the Morena Corridor as a mixed-use village that has a vibrant community core with strong restaurant/retail/design district components and gathering places, balanced residential density that includes affordable housing, quality urban design, safe and accessible travel for all modes, employment opportunities, supporting infrastructure, and public amenities.

I've attended many of the Clairemont Planning Sub-Committee meetings and was there when this Vision and the Guiding Principles were developed jointly with the Sub-Committee, residents and the City Planner. They are in direct contrast to the Project Objectives of the PEIR on pages S-2 and S-3, also copied below.

It appears the Vision and Guiding Principles developed by the residents were ignored by the City. Nearly everything in the Specific Plan and PEIR are in direct conflict with the wishes of the Residents. The Specific Plan and PEIR:

- do not in any way provide balanced residential density that includes affordable housing (looks like all development will be luxury appts/condos)
- provide safe and accessible travel for all modes (a lot more on this later)
- provide supporting infrastructure such as police and fire
- "Protect and enhance Morena Corridor's unique neighborhood character"

M-1

Comment noted. This comment does not suggest an inadequacy in the analysis of the PEIR.

M-2

The PEIR provides an analysis of potential impacts associated with the Specific Plan as required under CEQA. While not a CEQA issue, the Specific Plan would provide a range of housing as detailed in Specific Plan Table 2-2, Land Use Designations. The density ranges allow an assortment of housing products to meet many housing budgets. With respect to the other bullet points in this comment, please refer to the following PEIR sections:

- Mode of travel (includes pedestrian and bicycle access): Section 6.2
- Police and Fire: 6.13
- Neighborhood Character/Public Views: 6.7

LETTER

RESPONSE

M-3

- “Ensure that new development respects general mass, volume and scale of the existing built environment”
- “Reserve public views of Mission Bay”, “Provide a range of housing options”
- “Ensure safe and efficient travel for pedestrians, bicycles, and vehicles”
- “Improve access to Mission Bay Park” (the overpass designs for biking and walking are a disaster waiting to happen)

This has me very concerned that any new comments from the residents and Clairemont & Linda Vista Planning Sub-Committees will be ignored as well and that the current project proposed is a foregone conclusion. So much for community input. What a sham.

M-4

1.3. GUIDING PRINCIPLES

- Protect and enhance Morena Corridor's unique neighborhood character.
- Ensure that new development respects general mass, volume, and scale of the existing built environment.
- Improve visual quality along Morena Boulevard.
- Preserve public views of Mission Bay.
- Establish a varied and balanced mix of uses.
- Encourage the preservation of existing restaurants and the development of new restaurants along the Morena Corridor.
- Provide a range of housing options.
- Integrate new uses that complement the existing neighborhood character.
- Improve Morena Corridor as a place of services, shopping, and small business with a design district theme.
- Create additional gathering and recreational open space opportunities.
- Improve mobility for all modes of transportation.
- Ensure safe and efficient travel for pedestrians, bicycles, and vehicles.
- Improve access to Mission Bay Park.

M-3

Comment noted. This comment does not suggest an inadequacy in the analysis of the PEIR.

M-4

The commenter restates the Guiding Principles as stated in the Specific Plan. No further response is required.

Project Objectives of the PEIR on pages S-2 and S-3:

- Create a focused long-range plan for the Linda Vista Community Plan area **intended to promote high-density residential** and employment opportunities consistent with the City of Villages strategy and the Climate Action Plan (CAP), while deferring such land use planning efforts within the Clairemont Mesa Community Plan area to the Clairemont Mesa Community Plan Comprehensive Update.
- Within the Linda Vista Community Plan area:
 - **Establish land uses that facilitate transit-oriented mixed-use development in transit priority areas.**
 - **Leverage regional transit investment and provide critically needed housing by designating high-density residential and mixed-use development within close proximity to the transit stations.**

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Page S-2

- **Enhance multi-modal connectivity between neighborhoods, Mission Bay Park, and the Clairemont Drive, Tecolote Road, and Morena/Linda Vista trolley stations.**
- **Create a complete mobility system that promotes access and increases safety for pedestrians, bicycles, and transit.**
- Identify areas for accessible public gathering spaces and passive recreation opportunities.

M-5 Areas of Controversy

On page 5 of the Specific Plan, 1.6 Planning Process, the last bullet point reads

- **Engage the diversity of people, perspectives, and priorities in the Clairemont Mesa and Linda Vista communities.**

Well it appears you heard us but did not listen. Comments to Table S-1 of the PEIR:

M-6 Table S-1 Summary of Significant Environmental Impacts:

Environmental Issue
Land Use
Would the proposed project conflict with the environmental goals, objectives, or guidelines of a General Plan or Community Plan or other applicable land use plan or regulation and as a result, cause an indirect or secondary environmental impact?

While the project may fit with the City's General Plan, which doesn't consider the wishes of residents, I disagree with "Non Required" on mitigation and "No Impact" with regards to our Community Plan. It disregards current height limits, adds traffic, air pollution and affects our quality of life.

M-5 The commenter restates the Guiding Principles as stated in the Specific Plan. No further response is required.

M-6 Table S-1 provides a summary of the findings discussed throughout the PEIR. With respect to the project consistency with the General Plan or Community Plan, see Section 6.1, which provides a detail of the project's consistency with applicable land use regulations, specifically those related to consistency with the Clairemont Mesa and Linda Vista community plans. As discussed therein, the proposed project would be consistent with applicable environmental goals, objectives, and guidelines of the General Plan and other applicable plans and regulations, with no indirect or secondary environmental impact resulting. Impacts would be less than significant.

Impacts related to traffic and air pollution are discussed in PEIR Sections 6.2 and 6.4, respectively.

LETTER

RESPONSE

- M-7 Transportation and Circulation, Roadway Segments & Intersections, page S-7: The mitigation identified does not go far enough. We are left with "Significant and Unavoidable" Impacts after mitigation. There is an easy way to mitigate this - **don't increase the population density so ridiculously high!**
- M-8 Transportation and Circulation, Freeway Segments, page S-8: It states that proposed "improvements are anticipated to be implemented by the year 2050". Wow, most of the residents here won't even get to enjoy these improvements while riding in our funeral processions!
- M-9 Transportation and Circulation, Ramp Meters, page S-9: The mitigations listed do not qualify as a "mitigation", again leaving us with Significant impacts.
- M-10 Everything listed in the Transportation and Circulation section results in Significant and Unavoidable impact levels AFTER mitigation.
- M-11 Vehicle & Rail Noise, pages S-10 & S-11: There are no mitigations listed leaving us with Significant impacts! We can't do anything about the trolley but there is an easy way to mitigate Vehicle Noise - **don't increase the population density so ridiculously high!**
- M-12 Air Quality:

Air Quality	
Would the proposed project conflict with or obstruct implementation of the applicable air quality plan?	Future operational emissions associated with build-out of land uses within the Specific Plan area would be greater than anticipated future operational emissions associated with build-out of existing land uses under the adopted community plans for the same area. Therefore, emissions of ozone precursors (reactive organic gases and oxides of nitrogen) would be greater than what is accounted for in the Regional Air Quality Strategy (RAQS). Thus, the Specific Plan would conflict with implementation of the RAQS, and could have a potentially significant impact on regional air quality (Impact 6.4-1).
Would the proposed project result in a violation of any air quality standard or contribute substantially to an existing or projected air quality violation?	When considering a worst-case construction emission scenario of 25 percent of all proposed multi-family, office, retail, and industrial land uses and roadway surfaces being under construction at the same time, construction emissions would not result in air emissions that would exceed the applicable thresholds, resulting in a less than significant impact. Operational emissions associated with build-out of the proposed Specific Plan would be greater for all pollutants when compared to the adopted land uses and the assumptions used to develop the RAQS; thus, overall build-out of the Specific Plan area would result in a potentially significant operational emission impact (Impact 6.4-2).

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Page S-14

The mitigations listed are not really mitigations at all. By increasing the population density so high with all these new people's many vehicles, you leave the current residents to choke on unhealthy air.

- M-7 The commenter provides a statement in which the transportation impacts found in the PEIR could be mitigated through not increasing density within the Specific Plan area. As required under CEQA, alternatives to the proposed project were analyzed and assessed, which included No Project, Mid-Density, and Low-Density alternatives. Each of these alternatives would be feasible to implement and would lessen the overall traffic impacts as compared to the proposed project.
- M-8 Community Plans are built out over time, with the year 2050 being the generally accepted horizon, consistent with SANDAG and other planning agencies.
- M-9 The mitigation proposed for impacts to ramp meters (mitigation measure TRANS 6.2-10) qualifies as feasible mitigation, consistent with the requirements of CEQA Guidelines Section 15126.4. However, because at the program level future improvements are undefined, impacts would remain significant and unavoidable. Candidate Findings would be required by the City upon adoption of the Specific Plan.
- M-10 The comment restates the findings of the PEIR. Due to the Significant and Unavoidable impact findings associated with traffic impacts, Candidate Findings would be required by the City upon adoption of the Specific Plan.
- M-11 The commenter provides a statement in which the noise impacts found in the PEIR could be mitigated through not increasing density within the Specific Plan area. As required under CEQA, alternatives to the proposed project were analyzed and assessed, which included No Project, Mid-Density, and Low-Density alternatives. Each of these alternatives are feasible to implement and would lessen the overall traffic and associated vehicle noise impacts as compared to the proposed project.

LETTER

RESPONSE

	<p>M-12 The mitigation proposed for impacts associated with the project's conflicts with air quality plans and violations of air quality standards (mitigation measures AQ 6.4-1 and AQ 6.4-2) qualify as feasible mitigation, consistent with the requirements of CEQA Guidelines Section 15126.4. However, with respect to mitigation measure AQ 6.4-1, because updates to SANDAG population and employment projections would not occur prior to project approval, impacts would remain significant and unavoidable until plans are updated. With respect to mitigation AQ 6.4-2, while identified regulations would reduce emissions and may preclude many potential impacts, at the program level future emissions information is not available, and impacts would remain significant and unavoidable. Candidate Findings would be required by the City upon adoption of the Specific Plan.</p>
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M-13

Visual Effects and Neighborhood Character			
Would the proposed project result in a substantial obstruction of a vista or scenic view from a public viewing area as identified in the community plan?	Within the Linda Vista portion of the Specific Plan area, height limits would be increased from 30 feet up to 45 feet without a discretionary permit that would have the potential to alter views of the Presidio, and Mission Bay and the Pacific Ocean. Additionally, adoption of the TODP could result in significant impacts related to public scenic views as the program would facilitate new development in certain areas that could achieve heights up to 65 or 100 feet. Thus, potential impacts related to public views associated with build-out of Specific Plan land uses within the Linda Vista portion of the Specific Plan area including implementation of the TODP would be significant.	None Identified	Significant and Unavoidable
Would the proposed project result in a substantial alteration (e.g. bulk, scale materials or style) to the existing or planned (adopted) character of the area?	The increase in allowable densities and height within the Linda Vista portion of the Specific Plan area, specifically around the existing and planned transit stations within the Morena Station and Tecolote Village districts, could alter the existing neighborhood character of the area and result in an increase in the bulk of buildings compared to the existing condition. Additionally, future development under the TODP could further alter neighborhood character due to increased heights and	None Identified	Significant and Unavoidable

Environmental Issue	Results of Impact Analysis
	density compared to the existing condition. Impacts would be significant.

It's apparent that The Vision and Guiding Principles of the Specific Plan have been disregarded. **You will actually be blocking our Vision!**

M-14

Public Services & Facilities, pages S-26 & 27: The high density plan will have significant effects on response times from Police and the Fire Department. The PEIR already identifies that Fire Station 25, the only facility serving the corridor, has a response time of 8 min and 53 sec, well above the target of 7 min and 30 sec (page 6.13-4). The PEIR also identifies that more schools will be needed. Every new development **MUST** cover the costs to add these needed public services.

M-15

M-16

I will now address two main topics within the PEIR and Specific Plan, Land Use and Zoning, and Mobility/Transportation/Safety.

II. Land Use and Zoning:

Table 3-1 Existing and Future Residential Dwelling Units and Non-Residential Square Footage (SF)					
Existing Dwelling Units	Existing Non-Residential SF	Adopted Community Plan Dwelling Units	Adopted Community Plan Non-Residential SF	Proposed Dwelling Units	Proposed Non-Residential SF
996	8,141,500	1,386	3,385,900	7,016	2,684,300

The first bullet of Section 3.2, Project Objectives, page 3-2 states the objective is "intended to promote high residential density...". Again, while this is in line with the City of San Diego General Plan it is not what the residents or Clairemont & Linda Vista Planning Sub-Committees wanted or planned for. The above table shows a 7-fold increase in the number of dwelling units proposed, almost 6,000 more than the adopted community plan! While the city may think that these people will not own cars and ride public transit, reality will be that each unit will have 2-3 cars, especially if the units are luxury as we've been hearing. That's 12,000 to 18,000 additional vehicles that potentially (I'll use one of your words that you often use), could be on the streets of our community. Where will they park all these vehicles?

M-13

The comment restates the findings of the PEIR. Due to the Significant and Unavoidable Impact findings associated with aesthetic impacts, Candidate Findings would be required by the City upon adoption of the Specific Plan.

M-14

As discussed in Section 6.13.3 of the PEIR, as development occurs, each project will be evaluated by emergency service personnel and will be required to pay Developer Impact Fees. Fire suppression will be required through compliance with City fire safety policy and regulations regarding placement of fire hydrants and water lines, and the requirements for fire sprinkler systems. Payment of these fees would ensure impacts to fire/life safety protection are less than significant.

M-15

As discussed in Section 6.13.3 of the PEIR, Future residential development that occurs in accordance with the proposed Specific Plan would be required to pay school fees as outlined in Government Code Section 65995, Education Code Section 53080, and Senate Bill 50 to mitigate any potential impact on district schools.

M-16

As detailed in Chapter 3.0 of the PEIR, new and improved parking is designated throughout the Specific Plan area. Additionally, the Specific Plan includes policies to promote structured parking. Additionally and with respect to adequate parking, planning for high-density residential development near high-quality transit is a focus of the City General Plan City of Villages Strategy, the City's Climate Action Plan, and is consistent with SANDAG strategies identified in the Regional Plan. The intention would be the promotion of transit and the lessening of the need for individual automobile use throughout the Specific Plan area.

- M-17** Table 3-3 below shows that the current height limit of 30 Feet for residential and commercial buildings (45 for commercial with a permit) is being tossed out the window for a standard 45 foot height limit, 50% higher! Plus in the Morena station area it can go as high as 65 feet, over double, and at Tecolote station it goes over 3 times as high to 100 feet!!! So much for protecting our views! I really get a kick out of this statement on page 5-2 of the PEIR. Wow.

Community and Specific Plans are important because they contain specific policies that protect community character. Future public and private projects will be evaluated for consistency with policies in the community plans and applicable Specific Plans.

**Table 3-3
Regulatory Changes Affecting Linda Vista Community Plan**

Existing				Proposed			
Land Uses	Density (du/acre)	Max Height (feet)	FAR	Land Uses	Density (du/acre)	Max Height (feet)	FAR
Residential Uses							
Residential - Low	5 - 9	30	^	Residential - Low	5 - 9	45	^
Residential - Medium	15 - 30	30	^	Residential - Medium	15 - 30	45	^
Residential - Medium High	30 - 43	30	^	Residential - Medium High	30 - 43	45	^
Mobile Home Park	^	30	^	Mobile Home Park	^	45	^
Non-Residential Uses							
Neighborhood Commercial	^	30/45 ¹	^	Neighborhood Commercial	^	45	^
				Neighborhood Commercial Residential Permitted	15 - 29	45	^
Community Commercial	^	30/45 ¹	^	Community Commercial	15 - 54	45	^
				Community Commercial Residential Permitted	15 - 29	45	^
				Community Village Morena Station	0 - 54 (Up to 73 with TODPE)	45 (up to 65 with TODPE)	^ (up to 4.5 with TODPE)
				Community Village Tecolote Station	0 - 54 (Up to 109 with TODPE)	45 (up to 100 with TODPE)	^ (up to 5.0 with TODPE)
General Commercial	^	30/45 ¹	^	General Commercial	^	45	^
Office Commercial	^	30/45 ¹	^	Office Commercial	^	45	^
Visitor Commercial	^	30/45 ¹	^	Visitor Commercial	^	45	^
Industrial	N/A	30/45 ¹	^	Light Industrial	N/A	45	^
				Institutional	^	45	^
				Park	^	45	^

Source: City of San Diego, 2017b
 FAR = floor area ratio
 TODPE = Transit Oriented Development Enhancement Program
 ^ Established in base zone.
¹ Up to 45 feet is allowed with a discretionary permit.

- M-18** Section 6.7.2 on page 6.7-1 of the PEIR states:

modified from the City's CEQA Significance Determination Thresholds to reflect the programmatic analysis for the proposed project. A significant visual effect and neighborhood character impact could occur if implementation of the proposed project would:

- 1) Result in a substantial obstruction of a vista or scenic view from a public viewing area as identified in the community plan;

- M-17** The comment summarizes information contained in the PEIR (Table 3-3). This comment does not suggest an inadequacy in the analysis of the PEIR.

- M-18** As discussed in Section 6.7.3, the PEIR determined that the increased height limits would result in significant impacts to scenic vistas and views for the public views of Mission Bay in the Linda Vista portion of the Specific Plan area.

The proposed height limits will definitely have a significant impact on people's and public views.

M-19 More from 6.7.3 Impact Analysis of the PEIR:

roadways, and upgrading intersections to be consistent with the City's Street Design Manual. These improvements would support improved lines of sight through the community through use of a grid pattern roadway network. Similarly, the Specific Plan Urban Design Framework encourages preservation of public view corridors that are oriented towards natural open spaces and Mission Bay, including views from Milton Street and Illion Street.

Future projects implemented in accordance with the Specific Plan would be required to demonstrate compliance with following relevant policies identified in the Specific Plan:

- Guiding Principle: Preserve designated public views of Mission Bay.
- Urban Design Framework: Public view corridors that are preserved and public view sheds that are oriented towards natural open spaces and Mission Bay.
- Policy 4.2.19: Utilize street trees to establish linkages between blocks and to frame public views.

In addition to compliance with Specific Plan policies, future development proposals within the Specific Plan area would be required to comply with the development regulations within the LDC and community plan policies related to public spaces and neighborhood character.

No land use changes are proposed within the Clairemont Mesa portion of the Specific Plan area, and the existing 30-foot height limit within that area would remain; therefore, there would be no potential obstruction to scenic vistas or views. Within the Linda Vista portion of the Specific Plan area, height limits would be increased from 30 feet up to 45 feet without a discretionary permit. While there are a number of existing buildings of similar heights in the Linda Vista portion of the Specific Plan area, an increase in the potential for development of buildings up to 45 feet would have the potential to alter public views of Mission Bay and the Presidio, which are identified in the Linda Vista Community Plan's Community Plan Implementation Overlay Zone (CPIOZ) and commercial design standards. Land within the Specific Plan area is relatively flat and existing views

Morena Corridor Specific Plan PEIR
Page 6.7-2

are generally already obstructed from existing development and structures; however, areas surrounding the Specific Plan area (particularly to the east) are located at a higher elevation which affords views towards the bay and other surrounding viewpoints such as the San Diego River. An increase in building heights within the Linda Vista portion of the Specific Plan area could obstruct some existing views from these surrounding areas.

The last sentence should say **WOULD** instead of **could**.

M-20

districts with approval of a Planned Development Permit (PDP). Within the Community Village land use designation of the Morena Station district of the Specific Plan, building heights would be allowed up to 65 feet with approval of a PDP and within the Community Village designation of the Tecolote Village district, building heights up to 100 feet would be allowed with approval of a PDP. These taller buildings could have the potential to obstruct views of Mission Bay and the Pacific Ocean, which are identified in the Linda Vista Community Plan. While future development under the TODEP program

Again change "could" to "WOULD".

M-19 The PEIR acknowledges that potential impacts at the program level are unknown without detailed project-specific development information. Therefore, the term "could" is used. However, notwithstanding the use of this term, the PEIR finds impacts related to public views associated with build-out of Specific Plan be significant.

M-20 See response to comment M-19.

<p>M-21</p> <p>under CEQA to determine if scenic views or vistas could be substantially obstructed, it cannot be known with certainty whether the potentially significant impacts of development under the TODEP program can be fully mitigated as part of the subsequent environmental and permit process. Thus, at a program level of analysis, adoption of the TODEP could result in significant impacts related to public scenic views as the program would facilitate new development in certain areas that could achieve heights up to 65 or 100 feet. Thus, potential impacts related to public views associated with build-out of Specific Plan land uses within the Linda Vista portion of the Specific Plan area including implementation of the TODEP would be significant.</p> <p>In other words, the new height limits will definitely have a significant and negative impact on people's views.</p>	<p>M-21</p> <p>As discussed in Section 6.7.3, the PEIR determined that the increased height limits would result in significant impacts to scenic vistas and views. This comment does not suggest an inadequacy in the analysis of the PEIR.</p>
<p>M-22</p> <p>Cumulative Impacts</p> <p>Future growth within the Specific Plan area in combination with development within surrounding community planning areas, including Clairemont Mesa and Linda Vista, has the potential to cumulatively impact the visual environment through the design, height, and location of future buildings. As discussed under Issues 1 and 2, implementation of the Specific Plan, specifically for the Linda Vista portion of the Specific Plan area, would result in potentially significant impacts related to scenic views and neighborhood character. As land uses within the surrounding communities are developed, particularly the potential land use changes associated with the comprehensive update to the Clairemont Mesa Community Plan, allowable development intensities and building heights could be increased, similar to the Linda Vista portion of the Specific Plan area. Considering the planned transit stop within the Clairemont Mesa portion of the Specific Plan area and the overall goal of the City to promote transit supportive densities within areas with high quality transit, it is likely that additional density will be recommended in this area that would contribute to a cumulative impact related to scenic views and neighborhood character. Typically, to achieve higher residential densities, additional height allowances are required. These potential land use changes within the Specific Plan area and within the broader Clairemont Mesa Community Plan would result in a cumulatively considerable impact related to scenic views and neighborhood character.</p>	<p>M-22</p> <p>A detailed analysis of the project's potential impacts to traffic, visual quality and neighborhood character is discussed in PEIR Sections 6.2 and 6.7 (Issue 1 and Issue 2).</p>
<p>M-23</p> <p>Note that in the middle of this paragraph it is stated that there will likely be high density and height limit changes around the Claremont Drive Trolley Station! Bringing more traffic, more views ruined, more loss of neighborhood character.</p> <p>incorporate features that enhance neighborhood character and minimize adverse impacts associated with increase bulk, scale, and height. However, notwithstanding these requirements, cumulative development within the Specific Plan area and surrounding community plans would result in a cumulatively considerable impact related to scenic views and neighborhood character.</p> <p>significant impacts related to public scenic views as the program would facilitate new development in certain areas that could achieve heights up to 65 or 100 feet. Thus, potential impacts related to public views associated with build-out of Specific Plan land uses within the Linda Vista portion of the Specific Plan area including implementation of the TODEP would be significant.</p> <hr/> <p>Morena Corridor Specific Plan PEIR Page 6.7-7</p>	<p>M-23</p> <p>The comment restates the findings of the PEIR. As discussed in Section 6.7.3, the PEIR determined that the increased height limits would result in significant impacts to scenic vistas and views as well as neighborhood character.</p>

TODEP will definitely impact our views and neighborhood character.

6.0 Environmental Analysis

6.7 Visual Effects and Neighborhood Character

M-24

Neighborhood Character

The increase in allowable densities and height within the Linda Vista portion of the Specific Plan area, specifically around the existing and planned transit stations within the Morena Station and Tecolote Village districts could alter the existing neighborhood character of the area and result in an increase in the bulk of buildings compared to the existing condition. Additionally, future development under the TODEP could further alter neighborhood character due to increased heights and density compared to the existing condition. Impacts would be significant.

Issue 2 Neighborhood Character

Would the proposed project result in a substantial alteration (e.g. bulk, scale materials or style) to the existing or planned (adopted) character of the area?

No land use changes are proposed within the Clairemont Mesa portion of the Specific Plan area, and the existing 30-foot height limit and base zone regulations within that area would remain; therefore, there would be no substantial alteration to the existing or planned character of the Clairemont Mesa portion of the Specific Plan area.

How can you say this with a straight face? Are the thousands of people and cars from the proposed high density growth not going to drive, eat, play or visit the Clairemont and Bay Park areas? How will they get to the freeway? How will they get to Clairemont Drive? Wow.

On page 6.7-5, Linda Vista will have their neighborhood character scarred forever.

M-25

Impact 6.7-2: A significant impact related to neighborhood character would occur as a result of future development within the Linda Vista portion of the Specific Plan area due to increased heights and development intensity that could conflict with existing neighborhood character.

6.7.5 Mitigation Framework

The Specific Plan identifies a robust policy framework to address potential adverse effects related to scenic vistas/views and neighborhood character. Furthermore, the Specific Plan would require processing of a PDP and additional CEQA review for projects proposed under the TODEP program.

Would you please explain this robust policy that is protecting our views and neighborhood character?

M-24 The statement relating to the Clairemont Mesa portion of the Specific Plan is correct. Traffic-related issues associated with the totality of plan changes are discussed in Section 6.2 of the PEIR.

M-25 The PEIR acknowledges that changes in density and development allowances could result in significant impacts. The Specific Plan contains development design policies focused on reducing impacts to neighborhood character (see Specific Plan Chapter 4.4). The PEIR finds that at the program-level impacts to scenic vistas/views and neighborhood characters are significant and unavoidable as the Specific Plan would allow for development that would potentially block public views of Mission Bay and/or would be at a significantly different bulk and scale as the current development. A Statement of Overriding Considerations would be required by the City upon adoption of the Specific Plan.

- M-26 Would you please explain your statement below? The whole objective of your plan is to promote high density housing. This is written throughout the PEIR and Specific Plan. Chapter 8 of the PEIR is Titled "Growth Inducement"!!!

7.4 Population and Housing

While population projections for the Specific Plan area indicate that population will increase over time, population growth would not result from implementation of the Specific Plan. No land use

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Page 7-2

7.0 Effects Found Not to be Significant

changes are proposed within the Clairemont Mesa Community Plan portion of the Specific Plan area that would accommodate additional growth. While land use changes are proposed for the Linda Vista Community Plan portion of the Specific Plan area, the increase in development potential in this area would accommodate existing growth already projected to occur in the area and would occur as redevelopment and infill. The proposed project would not displace people or existing housing, as the Specific Plan would designate planned land uses and zoning that would accommodate future development and increase the potential for additional housing. Therefore, no impacts related to population and housing would occur.

How can you make the statement in the last sentence? What do you mean by "growth already projected"? What projections?

Chapter 8.0 Growth Inducement

- M-27 Pursuant to California Environmental Quality Act (CEQA) Guidelines Section 15126.2(d), the following growth inducement analysis is required:

Discuss ways in which the proposed project could foster economic or population growth, or the construction of additional housing, either directly or indirectly, in the surrounding environment. Included in this are projects which would remove obstacles to population growth (a major expansion of a waste water treatment plant might, for example, allow for more construction in service areas). Increases in the population may tax existing community services facilities, requiring construction of new facilities that could cause significant environmental effects. It must not be assumed that growth in any area is necessarily beneficial, detrimental, or of little significance to the environment.

Again, this proposal is all about growing the population in this area.

- M-26 The comment reiterates Section 7.4 of the PEIR. As discussed therein, the increased density proposed by the project would accommodate growth already anticipated in the San Diego area.

- M-27 A growth-inducing impact would occur if the project would result in growth that could not be accommodated (i.e., development of new roads through an otherwise unpopulated area). The proposed project would allow higher-density residential development and employment uses in areas near transit and along commercial corridors thereby fostering an accommodating relationship between population and facilities consistent with the City of Villages strategy and implementing the policy goals of the City's Climate Action Plan.

M-28

Table 10.1 on page 10-3 of the PEIR state that with TODEP, population will grow from 2,659 currently in the plan area to **16,266 people**. This is a huge increase that will have **more** than significant effects on the plan area and neighboring areas under every criteria in the impact analysis.

Switching to the Specific Plan document, I have the following comments on Land Use and Zoning.

The section of the Specific Plan shown below was blank in previous versions, as well as the last draft available, June 2017, that were provided to the Planning Sub-Committees and residents. Therefore, this information was not available for decisions that were made by the Committees such as removing a lane from Morena Blvd.

2.1. LAND USE DESIGNATIONS

Table 2-1 shows potential buildout within the Specific Plan area.

The land uses and residential intensities are illustrated on the Land Use Map (Figure 2-1). The Land Use Map provides a general guide to land use distribution and illustrates allocation of residential density.

Table 2-2 beginning on page 9 summarizes and describes the Land Use Designations within the Morena Corridor.

Table 2-1 - Morena Corridor Potential Build-Out

	Existing 2010	Build Out
Residential Development (Number of Dwelling Units)		
Single-Family	27	18
Multi-Family	969	6,898
Total Residential	996	7,016
Non-Residential Development (Floor Area Square Footage)^a		
Commercial, Employment, Retail & Services	2,990,000	2,535,000
Institutional	150,000	150,000
Total Non-Residential	3,140,000	2,685,000

^aSquare footages reflect rounded estimations.



7

The section of the Specific Plan shown below did not include the height increase in previous versions, or the last draft available, June 2017, that were provided to the Planning Sub-Committees and residents. Therefore, this information was not available for decisions that were made by the Committees.

M-28

The Morena Corridor Specific Plan evaluated circulation element roadways within the Specific Plan area. Study area roadway segments and intersections analyzed in this transportation and circulation section are shown on Figure 6.2-1. Chicago Street, Erie Street, and Frankfort Street are all local roadways outside of the Morena Corridor Specific Plan area and were not included in the evaluation.

Transit-Oriented Development Enhancement Program

The Transit-Oriented Development (TOD) Enhancement Program can be utilized within the Tecolote Village District, which is designated Community Village (54 DU/AC) as shown on Figure 2-1. The intent of the TOD Enhancement Program is to allow for increased residential density to create transit-oriented development that supports the implementation of the CAP and implements the Mobility and Urban Design policies of the Specific Plan. The TOD Enhancement Program allows for the density range for this area to be increased up to 109 dwelling units per acre through a discretionary review process. The Program also allows for structure heights up to 100 feet and a maximum floor area ratio of 5.0 through a public review and decision processes outlined in the Implementation Chapter. A project using the TOD Enhancement Program must be consistent with the Specific Plan Urban Design and Mobility policies and conform with the supplemental development regulations outlined in the Implementation Chapter.



14

On page 15 under Policies is

2.3.3. Provide a range of housing opportunities, types, and affordability.

I hope affordable housing units will be included. I am hearing that many of the developments in Tecolote will be luxury units.

In previous versions/drafts of the Morena Specific Plan, in section 2.7, a pocket park was planned between Ashton and Napier streets, paragraph 2.7.4 of the August 2017 version. It is not in the latest version. What happened to the park?

III. Mobility, Transportation & Safety

Besides the issues regarding mobility in the Environmental Impact Analysis section above, Section 3.2, Project Objectives on page 3-2 of the PEIR has the following objectives.

- Enhance multi-modal connectivity between neighborhoods; Mission Bay Park; and the Clairemont Drive, Tecolote Road, and Morena/Linda Vista transit stations.
- Create a complete mobility system that promotes access and increases safety for pedestrians, bicycles, and transit.

Connectivity between the Specific Plan area and Mission Bay is not enhanced. The proposed pedestrian and bicycle modifications to the Clairemont Drive overpass shown below from the Specific Plan are unacceptable.



Conceptual design of enhanced Class II bicycle facility along Clairemont Drive at the I-5 Overpass bridge.



40

This is completely unsafe. The rubber pylons will not protect anybody. All you need to do is drive down Balboa Avenue east of Clairemont Drive to see how many pylons have been taken out by vehicles. The residents and Planning Sub-Committee have been calling for a pedestrian bridge over I-5 for bicycles and pedestrians to safely travel to and enjoy one of San Diego's greatest treasures, Mission Bay Park. This is a perfect example of where we were heard but not listened to. I don't think this is a lot to ask. People, children will be killed and maimed if they are forced to use the proposed "solution" above. If you drive up I-5 you will see not 1, but 2 bridges where the new trolley crosses the freeway. In addition an entirely new overpass is being built between Genesee and La Jolla Village Drive. Seems that La Jollans are worthy of a new overpass, but not us.

Another location where the proposed mobility plan is unsafe, and not meeting the second objective above is the intersection/crossing for people to cross Morena Blvd from the parking lot to the new Clairemont trolley station. All trolley passengers will be expected to cross Morena Blvd to catch their trolley at the traffic signals. Inevitably, and probably quite frequently people in a hurry to catch the leaving trolley will run across traffic on Morena Blvd and be killed or maimed. Not only will innocent people be killed because of the lack of foresight in the City Planning office and SANDAG but the poor innocents who hit and/or kill these people will be traumatized for life. How many other major trolley stations in the County have this situation? I would guess very few, if any.

I have a better proposed solution to both problems above. The planned parking area for the Clairemont station is already at a higher elevation than Morena Blvd. Build a pedestrian/bicycle bridge over Morena Blvd that has stairs that will drop down to the trolley station. Continue this pedestrian/bicycle bridge over I-5 to Mission Bay Park. Mission Bay Park is truly a popular destination for people from all over the county. This could encourage people to take the trolley from other parts of San Diego, instead of driving to the Park. Or they could park in the trolley lot and walk/bike over, alleviating parking issues in Mission Bay Park. This would truly connect all of San Diego to the park and the beach communities.

Is it possible that the City could encourage the Hilton hotel to help pay for the pedestrian/bicycle bridge? That way their patrons would be able to take the trolley all over San Diego! The Hilton or the City could provide shuttles from the station to the hotel. The PEIR already talks about shuttle services on page 6.2-21.

The Specific Plan identifies a number of policies that would be supportive of enhanced transit service, such as coordinating with MTS and SANDAG to provide bus stop shelters and shuttle service to key destinations such as Mission Bay and Sea World and supporting a shuttle service between Tecolote Station and the University of San Diego. Overall, the Specific Plan would support General Plan, community plan, and SANDAG goals related to alternative transportation. Implementation of the specific plan would be consistent with the goals of the General Plan and the SANDAG goals.

I recommend another pedestrian/bicycle bridge be built from the new Tecolote trolley station over I-5 to the vacant lot on the other side for the same reasons listed above to get to Mission Bay Park and Fiesta Island. This vacant lot is used for OMBAC parking, shuttles to Torrey Pines Golf tournament and other events. Circus Vargas also sets up there, and races are held on Fiesta Island. Perhaps the City could get Sea World, OMBAC, Torrey Pines, Circus Vargas and others to help with the cost.

Throughout both the PEIR and the Morena Specific plan there are numerous references to making streets safe for all types of mobility, examples below. If it is repeated so many times, it must be important. So please make us safe.

- Transportation Goal 4: Provide safe and pleasant pedestrian walkways and bikeways to connect residential neighborhoods, schools, parks, and commercial areas.

5.2.2.5 City of San Diego Pedestrian Master Plan

The City's Pedestrian Master Plan was approved in December 2006 and unified citywide guidance to identify high-priority pedestrian improvements are to improve safety, accessibility, connectivity, and walkability. Community priority areas. The Linda Vista community was ranked as a second priority area.

Regarding the proposed changes to Morena Blvd, eliminating 1 southbound lane, this agreement from the residents and the Planning Sub-Committee was done before we were made aware of the high density being pushed upon us.

Table 3-2 Summary of Mobility Improvements			
#	Location	Existing Condition	Proposed Condition
1	Morena Boulevard from Ingulf Street to Knoxville Street	4-lane roadway with a bike lane along the west side and on-street parking along the east side with some areas of on-street parking along the west side	1 lane southbound and 2 lanes northbound with left-turn pockets at intersections, a 2-way cycle track along the west side of the roadway, and on-street parking along the east side and some areas along the west side



29

Picture above from the Specific Plan. Also note in the picture and many of the other ones in the Plan shows a concrete buffer between the cars and bikes. Yet you plan to put rubber pylons on the most dangerous areas, the overpasses!

Due to the extremely high density being proposed I am now totally against removing any lanes from all of Morena Blvd. Reducing lanes and adding thousands of cars makes absolutely no sense.

In section 6.2.3 Impact Analysis, b. Roadway Segments, the proposed project will increase the number of unacceptable segments from 8 to 10.

b. Roadway Segments

Under existing conditions, eight roadway segments operate at unacceptable LOS E or F as shown in Table 6.2-2. With implementation of the proposed project, 10 roadway segments would operate at unacceptable LOS E or F (Table 6.2-2). As indicated above in Section 6.2.2, roadway segment impacts:

Unfortunately, the PEIR does not take into account streets and roads that are out of the Specific Plan Corridor but are affected by the Specific Plan. A year or two ago Clairemont Drive was reduced from 2 lanes to one from Denver Street to Burgener Street to add a bike lane for the 2 or 3 people a month who use it. Not a hill I would ride up! I don't even like walking up it! This has created a major traffic jam and every intersection between Denver and Burgener now has extremely long waits to get on/off Clairemont Dr. The increased high density will make Clairemont Drive unusable. The PEIR also doesn't cover all of the residential streets just outside the Specific Plan Corridor like Chicago, Erie, Frankfort that will see significantly more traffic as people avoid Morena Blvd. This will have a dangerous impact on the families that live in these areas.

Switching to the Morena Specific Plan on this topic:

Many of the Mobility Goals below are not being met.

3 | Mobility

MOBILITY GOALS

- Promote community connection, access, and ease of travel by prioritization of multi-modal roadways designed and operated to enable safe, attractive, and comfortable travel for all users.
- Improve mobility for all modes of transportation.
- Implement long term roadway improvements including restoration of a grid network through new roadways.
- Provide adequate parking for all new development.
- Ensure safe and efficient travel for pedestrians, bicycles, and vehicles.
- Improve access to Mission Bay Park.

Previously, I've addressed all but the parking. I see nothing in either the PEIR or the Specific Plan that truly addresses parking. It's bad now, so it will only get worse.

Finally, I recommend that the PEIR and Specific Plan be updated to include a ban on dockless scooters and bikes. With the trolley and the high density, our neighborhood will be littered with these. Bicycle docking stations like the "Discover" models are certainly recommended to help with mobility.

IV. Plan Alternatives

Table 10.1 of the PEIR compares the density and population of the proposed High Density plan and the Middle and Low Density Plans.

Table 10-1 provides a summary of the build-out assumptions for each alternative.

	Existing	Proposed Project (with TODP)	No Project/ Adopted Plan Alternative	Mid-Density Land Use Plan Alternative	Low Density Land Use Plan Alternative
Dwelling Units	996	7,016 ¹	1,386	4,734	3,780
Population ²	2,659	16,266	3,930	11,153	10,857
Non Residential Square Feet	3,141,600	2,684,300	3,385,900	3,125,900	3,125,900

¹Same occupancy as proposed project.
²Total build out numbers incorporate the existing 996 residential units that currently occur within the Specific Plan area.
 TODP = Transit Oriented Development Enhancement Program

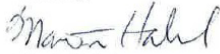
While I don't like any additional density as any of the 3 options above will significantly impact our views, neighborhood character, health and probably home values, it would be naïve to think additional density won't be forced upon us. Therefore if we have to make a choice, I recommend going with the Low Density Plan Alternative as it eliminates TODP and the height and high density issues. The Low Density alternative lessens the impact on us and San Diego does need more housing including affordable housing. Hopefully, the Specific Plan and PEIR will insist on adding affordable housing.

V. Conclusion

M-29

The City Planners did not listen to the input of the community and instead drove the San Diego General Plan down our throats. They did not listen before and I'm not too hopeful they will listen now. I just wish they and the City Council would truly look at this through the eyes of the current residents here and see what tragically will happen to our way of life. Many of us grew up here, our whole lives, or moved here many years ago because of the spectacular views and the family friendly character of this neighborhood. It saddens me to see it ruined by people who don't live here nor understand why we truly love it as it is.

Sincerely,



Martin Habel

2047 Galveston Street

Beautiful Bay Park

San Diego, Ca 92110

M-29 These concluding remarks are noted.

LETTER

RESPONSE

Letter N

From: Karen Friedrichs
To: [PLN_PlanningCEQA](#)
Subject: Morena Corridor Specific Plan 582608/SCH No. 2016101021
Date: Wednesday, August 29, 2018 11:18:40 AM

- N-1 Dear Rebecca Malone, Environmental Planner,
 I was at the meeting at USD last night for the discussion of the Morena Corridor Specific Plan. It was stated that comments on the draft PEIR will only be accepted up to October 1, so I am writing now. I've lived in the Overlook Heights neighborhood just west of USD and just east of Morena Blvd. for 29 years. I have watched the
- N-2 traffic on Morena Blvd. get worse and worse through the years with all of the residential, commercial and college traffic. Our neighborhood would be ruined if 6,000 more people were living in this small community. The plan shows a couple of streets opening up and one lane **removed** from Morena. This minor road configuration will not make a dent in the proposed traffic increase. The vast majority of my neighbors
- N-3 are vehemently against this glut of humanity and hope the planning commission and city council will veto this plan.
 Thank you,
 Karen Friedrichs
 1545 Everview Road
 San Diego, CA 92110

- N-1 This introductory comment is noted.
- N-2 For a discussion of traffic-related impacts, see Section 6.2.3 of the PEIR.
- N-3 The commenter's opposition to the project is noted.

LETTER

RESPONSE

LETTER	RESPONSE
<div data-bbox="212 168 428 253"> <p>Joseph and Sara Bell 5107 Onstad Street San Diego, CA 92110-1556 August 31, 2018</p> </div> <div data-bbox="212 300 527 407"> <p>Ms. Rebecca Malone Environmental Planner City of San Diego Planning Department 9485 Aero Drive, MS 413 San Diego, CA 92123</p> </div> <div data-bbox="212 433 310 451"> <p>Ms. Malone:</p> </div> <div data-bbox="212 477 974 518"> <p>Subject: Written Comments RE: PROJECT NAME: Morena Corridor Specific Plan; PROJECT No.: 582608 / SCH No.: 2016101021</p> </div> <div data-bbox="107 544 1016 1247"> <p>O-1 I along with many residents of Bay Ho, Bay Park, Overlook Heights and Clairemont attended Tuesday's Ad Hoc Subcommittee for the Morena Corridor Specific Plan at USD.</p> <p>O-2 After a lengthy presentation by the two City Planning representatives, the overall impression/consensus appeared to be the plan doesn't accurately reflect the potential impact it will have on our infrastructure and roads.</p> <p>O-3 The high rise building(s) proposed at Tecolote Village, we're told, have automobile usage factored at less than one automobile per unit. Given the serious lack of mass transit options in San Diego among many California cities (it's widely known that San Diegans prefer to drive alone vs. car pool), it is delusional to expect a sudden desire to ride a bike or take a Trolley to work or to pick up groceries.</p> <p>O-4 A big concern is traffic flow onto Interstate 5 North from Tecolote Road. The presentation did not show an increase in lanes (the female presenter had difficulty making her case) to handle the heavy demand 5,000+ units will place on our roads especially during morning and evening drive time.</p> <p>O-5 Much of the proposed modernization, albeit in illustrative form at this time, of our area appears to be a major improvement over the seedy mix of commercial and industrial building designs of yesteryear. What's more, the haphazard layout of Morena Blvd. and West Morena Blvd. most definitely need a do-over. This is the positive.</p> <p>O-6 The Plan as presented on August, 28th, at USD, does not incorporate much of the local's input given during the past several years. The consensus was to either start over or actually encompass what matters most to those who have lived in the affected areas i.e., preserve current height limits, reduce the projected number of units to be built at Tecolote Village and Morena Station as well as install appropriate infrastructure to meet the demands to be placed upon the roadways.</p> <p>O-7 Furthermore, a Trolley ridership study should have been a part of the planning process and its absence was vehemently denounced by a majority of the attendees.</p> <p>O-8 Lastly, several attendees voiced their consternation at Lorie Zapf, our District 2 City Council member's lack of personal visibility at our meetings. Her rep gave his boiler-plate reason she could not attend; however, all believe she needs to make an appearance in show of support for our community.</p> </div>	<div data-bbox="1077 175 2003 1360"> <p>O-1 Introductory comment noted.</p> <p>O-2 For a discussion of traffic-related impacts, see Section 6.2.3 of the PEIR.</p> <p>O-3 With respect to adequate parking, planning for high-density residential development near high-quality transit is a focus of the City General Plan City of Villages Strategy, the City's Climate Action Plan, and is consistent with SANDAG strategies identified in the Regional Plan. The intention would be the promotion of transit and the lessening of the need for individual automobile use throughout the Specific Plan area.</p> <p>O-4 For a discussion of traffic-related impacts associated with the Specific Plan, see Section 6.2.3 of the PEIR.</p> <p>O-5 The commenter's positive comment is noted.</p> <p>O-6 Comment noted. This comment does not suggest an inadequacy in the analysis of the PEIR.</p> <p>O-7 The comment questions the need for the densification associated with the Transit-Oriented Development Enhancement Program and requests a ridership study be prepared to show that future residents will use transit. The City recognizes that it cannot be guaranteed that future residents will take advantage of transit; however, planning for high-density residential development near high-quality transit is a focus of the City General Plan City of Villages Strategy, the City's Climate Action Plan, and is consistent with SANDAG strategies identified in The Regional Plan.</p> <p>O-8 Comment noted. This comment does not suggest an inadequacy in the analysis of the PEIR.</p> </div>

Letter O

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Page 2

Her latest re-election campaign promotional cards delivered last week to my front door would seem to contradict her stated support of the character of our community. Up to 100' tall is very much out of character within our community.

At the conclusion of the meeting, the mood turned toward Ms. Zapf's re-election prospects due to her absence and the overall belief that years of community input have resulted in the current, developer-friendly Plan. It is doubtful any affordable units reserved to appease the City's quest for affordable housing will be actually set aside upon build-out. What's more, it is doubtful renters will be given the opportunity to populate Tecolote Village given that the highest and best use for scarce land is not rentals but owner-occupied units.

The communities affected by the impending modernization make up a sizeable portion of District 2, Ms. Zapf's District. With elections in about three months, her constituents will not forget her allegiance or lack thereof in representing the needs and wants of those residents in the path of transformation.

I agree with our Ad Hoc Subcommittee Board's decision to not approve the Plan as presented.

Sincerely,



Joseph and Sara Bell

LETTER

RESPONSE

Letter P

September 4, 2018

Project Name: Morena Corridor Specific Plan

Project No.: 582608 / SCH no. 2016101021

To Whom it May Concern:

- P-1 My name is Abbie Hawkins and I own property in both of the Plan Areas of Claremont Mesa and Linda Vista. I am in full support of this Draft Plan PEIR.
- P-2 As a resident in this area and as a professional in land use and development, this plan is well thought out and addresses many of the major issues that this neighborhood possesses. This area currently is an underutilized wasteland where low density, and vagrancy thrive. I am scarred to ride my bike or go for a run to the bay in this area due to traffic (and the lack of multiple routes because the streets don't connect) and the homeless situation. This area needs a breath of fresh urbanism. This area is perfect for high density, urban infill, mixed use with restaurants that you can walk to or access by public transit. We need to seriously address the housing crisis in San Diego and higher density and public transit is going to be the answer to that problem. I urge you to listen to the voices of the younger generations and the progressives in San Diego instead of the voices who have had their chance to see things the way they have wanted it for the last 30 years. It is time to address the problems of today instead of trying to keep everything the way it is (it's not working). We need housing density next to public transit.
- P-3 I am a little sad to see that the height limit is only 45' and there is no pedestrian access between Morena Blvd and Mission Bay over I-5.
- Thank you for your time.



Abbie Hawkins

- P-1 This introductory comment and the commenter's support for the project are noted.
- P-2 The commenter's support for the project is noted.
- P-3 In regards to pedestrian access to Mission Bay over the I-5, as noted in Section 5.2, Transportation and Circulation, of the PEIR, the Specific Plan identifies policies to coordinate with Caltrans to provide bridge connections from the Specific Plan area to Mission Bay Park and improve cyclist mobility over the Clairemont Drive/East Mission Bay Drive and Sea World Drive/Tecolote Road Bridge. Ultimate construction of a bridge would require further feasibility analysis including site-specific environmental analysis and engagement with the community at the time a specific project is proposed.

LETTER

RESPONSE

Letter Q

From: WALTER DEAL
To: [PLN_PlanningCEQA](#)
Cc: [Prinz, Michael](#); [Jim LaMatter](#); [info@raisetheballoon.com](#)
Subject: PROJECT NAME: Morena Corridor Specific Plan, PROJECT No.: 582608 / SCH No. 2016101021
Date: Friday, September 07, 2018 1:10:08 PM
Attachments: [MorenaPEIRComments\(1of5\).rtf](#)
[MorenaPEIRComments\(2of5\).rtf](#)
[MorenaPEIRComments\(3of5\).rtf](#)
[MorenaPEIRComments\(4of5\).rtf](#)
[MorenaPEIRComments\(5of5\).rtf](#)

TO: PlanningCEQA@sandiego.gov

PROJECT NAME: Morena Corridor Specific Plan

PROJECT No.: 582608 / SCH No. 2016101021

RE: Draft PEIR for the Morena Corridor Specific Plan

Q-1

This email, including five attachments, gives my comments on the Draft PEIR for the Morena Corridor Specific Plan. The attachments are in rtf format, which should open in any word-processing program.

The attachments are:

Comments (1 of 5): Will the proposed housing in a Pollution Zone be fit for human habitation?
 Comments (2 of 5): Making a bad situation for private vehicles even worse
 Comments (3 of 5): A funny: San Diego has "sufficient water supplies"
 Comments (4 of 5): Pedestrian and bicycle safety – a criminally negligent Plan?
 Comments (5 of 5): The Morena Specific Plan and the PEIR advocate increased population, increased traffic and congestion, increased demands on already-inadequate water supplies, and decreased jobs. This is what City planners call "a comprehensive long-term plan."

Q-2

The thrust and the specifics of the Morena Specific Plan and the PEIR clearly show that the goal of City planners
 – **is not** to minimize energy use and greenhouse gas emissions; to protect the environment; and to enhance the quality of life of San Diego residents,

but rather

– **is** to continue dumb growth; to give short shrift to the health, safety, and quality of life of San Diego residents; and to maximize the profits of developers and owners of developable properties.

Predictable, but sad.

Q-3

Note: The City makes much use of the term "smart growth." The growth policies of the City, as exemplified by the Specific Plan and the PEIR, are in fact "smart" if
 1. They are from the perspective of and developed by people with IQs below 80
 and/or
 2. They are "smart" in the sense of maximizing profits for owners of

Q-1

Introductory comment is noted.

Q-2

Comment noted. This comment does not suggest an inadequacy in the analysis of the PEIR.

Q-3

Comment noted. This comment does not suggest an inadequacy in the analysis of the PEIR.

LETTER

RESPONSE

developers and developable properties, and maximizing the opportunity for corruption.

Feel free to contact me if I can provide any additional information.

Walter J. Deal
2252 Frankfort Street
San Diego, CA 92110
wjdeal@san.rr.com

Note: This email, including attachments, is also available in pdf format at

https://drive.google.com/file/d/13LO_u0KsNMEd9KvJwZ9Zgc4Qew-zXLcr/view?usp=sharing



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**Morena Specific Plan
Draft Program Environmental Impact Report (PEIR)**

Comments (1 of 5): Will the proposed housing in a Pollution Zone be fit for human habitation?

Walter J. Deal
2252 Frankfort Street
San Diego, CA 92110
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- Q-4 Backdrop: The climate in the area of the Morena Specific Plan is one of the most temperate in the world. Residents typically leave windows open, make minimal use of HVAC systems, encourage their children to play outdoors, and spend much time outdoors themselves. The pollution and noise impacting the housing proposed in the Specific Plan will preclude such a “green” lifestyle, and will require sealed windows, constantly-running HVAC systems, and minimal time spent outdoors, especially by children and other sensitive receptors. It would be an interesting exercise to calculate the net energy and greenhouse gas expenditures from such constraints compared to what is saved by some fraction of the residents using the trolley system instead of private automobiles. The net savings may be minimal, or even negative. Of course, the goal of implementation of the Specific Plan appears not to be to save the planet, it’s profits for property owners and developers; and whether or not the proposed development saves energy and minimizes greenhouse gas emissions is irrelevant to the real goals of the Specific Plan.
- Q-5 The housing proposed in the Morena Specific Plan, most of which is close to I-5 and a major railroad line (a “Pollution Zone”), will be subject to a number of health-related hazards: (1) seismic issues, (2) air pollution from diesel rail traffic, (3) air pollution from vehicle traffic on I-5, and (4) excessive sound levels from both rail traffic and vehicle traffic. I will address each of these issues.
- Q-6 (1) **Seismic issues.** The proposed housing units will lie on, or within a few hundred yards of, the Rose Canyon Fault. See especially PEIR sections 2.3.12 and 6.12. The strength and timing of an earthquake on this fault are uncertain, to say the least; some have projected that a magnitude >7 earthquake is a real possibility. City planners assure that proper building regulations will ensure the safety of the proposed housing units. We’ll see.
- It is imperative that prospective residents be informed of the seismic hazards to which they may be subjected.**
- Q-7 (2) **Air pollution from diesel rail traffic.** The proposed housing will lie either within, or adjacent to and downwind of, the rail lines, which have been designated as requiring a Proposition 65 warning, mainly because of diesel exhaust from railroad operations. Such warnings include the dangers of these emissions causing cancers, and the dangers from other chemicals which cause birth defects or other reproductive harm.
- It is **both astonishing and shameful** that in its 433 (!) pages the PEIR makes no mention of this Proposition 65 warning. Indeed, a search of the PEIR turned up absolutely no mention of the dangers from diesel exhaust from railroad operations (the PEIR does discuss diesel exhaust from construction equipment and vehicle traffic) or the existing Proposition 65 warning for the rail lines adjacent to the proposed housing. It would be interesting to know who ordered the authors of the PEIR to ignore the existing Proposition 65 warning, which is very relevant to the housing proposed in the Specific Plan and

- Q-4 This comment is a general statement about the need to keep windows closed to block out air/noise pollution. See responses to comments Q-6 through Q-9, below, for more detailed answers.
- Q-5 This comment briefly states the points the commenter will raise throughout the comment letter. See responses to comments Q-6 (seismic issues), Q-7 (air pollution from diesel rail), Q-8 (air pollution from I-5), and Q-9 (excessive noise).
- Q-6 The PEIR assesses impacts associated with seismic hazards, the analysis of which is contained within Section 6.12.3 of the PEIR. As discussed in this section, impacts associated with seismic hazards would be less than significant. Future construction occurring within the Specific Plan area would be evaluated in accordance with the CBC in effect at the time of development, in addition to standards adopted by the City of San Diego, which would ensure a reduced risk to future structures from strong seismic ground shaking. All new development and redevelopment within the Specific Plan area would be required to comply with the SDMC and the CBC, which include design criteria for seismic loading and other geologic hazards and require that a geotechnical investigation be conducted for all new structures, additions to existing structures, or whenever the occupancy classification of a building changes to a higher relative hazard category (SDMC Section 145.1803).
- Q-7 While the PEIR does not specifically mention Proposition 65, the health risk impacts due to sensitive receptors due to the exposure to diesel particulate matter is addressed under Section 6.4, Issue 3, Mobile Sources. The Specific Plan would not result in a change in the existing emissions due to diesel train traffic, and these emissions are currently a part of the existing background concentrations of diesel particulate matter that existing within the entire San Diego Air Basin. The policies provided in the Specific Plan and discussed on pages 6.4-11 and 6.4-12 would reduce the exposure of sensitive receptors to substantial concentrations of diesel particulate matter.

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the PEIR. [Note: I would be very happy to be proven wrong, and would gladly apologize, if the PEIR includes information about the relevant Proposition 65 warning.]

It is imperative that prospective residents be informed of the air pollution hazards from railroad operations to which they will be subjected, hazards which include cancer, birth defects, and other reproductive harm. They must be informed that children and other sensitive receptors should not be outside the residences except when necessary.

- Q-8 (3) **Air pollution from vehicle traffic on I-5.** The proposed housing will lie very close to I-5, with residents exposed to vehicle emissions, including diesel emissions. There will also be additional particulate matter, including dust from tire tread wear, another presumed carcinogen. The thrust of the PEIR is that the priorities of increased density and development (and profits for property owners and developers) outweigh the added risks to residents; see especially page 6.4-11. In earlier drafts of the Specific Plan and in conversations, City planners suggested that sealed windows and constantly-running HVAC systems in all residences would be employed to minimize both pollution and noise.

It is imperative that prospective residents be informed of the air pollution hazards from vehicle traffic to which they will be subjected, hazards which include cancer, asthma exacerbation, and loss of lung capacity. It is imperative that they be instructed that windows are to be kept closed and HVAC systems, with high-quality air filters, be kept running 24/7. They must also be informed that children and other sensitive receptors should not be outside the residences except when necessary.

- Q-9 (4) **Excessive sound levels from both railroad traffic and vehicle traffic.** The PEIR does an adequate job of showing that the proposed housing will be subjected to excessive sound levels. (Parenthetically, it is pleasing to me that the PEIR confirms, presumably at great expense, the results I reported several years ago using my personal dB meter.)

- Q-10 My only quibble is that the PEIR downplays the negative effects of train noise, since these are intermittent. Their logic is that, if the ambient level is 70 dB, a nearby gunshot at 95-100 dB roughly every 15 minutes would be only a small contribution to the negative effects of the ambient noise. A laughable perspective.

As with air pollution, the solution of City planners is sealed windows and constantly-running HVAC systems to minimize the noise inside residences.

It is imperative that prospective residents be informed of the excessive sound levels to which they may be subjected. It is imperative that they be instructed that, to minimize the deleterious effects of excessive sound levels, windows are to be kept closed and HVAC systems be kept running 24/7. They must be informed that children and other sensitive receptors should not be outside the residences except when necessary.

- Q-11 The best way to make sure potential residents are aware of the potential dangers is for them to be provided with a written list of these hazards (similar to a disclosure form for prospective real estate buyers). The next page gives a sample which could be provided to prospective renters and buyers. If the City does not require distribution of such a list because it might scare off prospective renters and buyers (lowering profits for property owners and developers), perhaps a civic-minded organization could distribute and/or post such a list in a conspicuous place (a billboard??).

- Q-8 Section 6.4.3 assesses anticipated air quality impacts from construction, operation, and mobile emission sources. As discussed in this section, it was determined that implementation of the Specific Plan would result in significant and unavoidable impacts. Project-level emissions information is not available at this time and it cannot be guaranteed that operational air emissions from the future developments within the planning area could be fully mitigated to below a level of significance even with implementation of mitigation measure AQ 6.4-2.

- Q-9 Noise impacts are discussed in Section 6.3 of the PEIR. Specifically, the PEIR includes an analysis of potential impacts related to exposure of residents to vehicular and rail noise. The PEIR concludes, after a complete analysis, that all future projects located in areas where exterior noise levels exceed the Land Use – Noise Compatibility Guidelines as defined in the General Plan Noise Element, Table N-3, site-specific interior noise analyses demonstrating compliance with the interior noise compatibility guidelines of the General Plan would be required. These requirements for site-specific noise analyses would be implemented through submission of a Title 24 Compliance Report to demonstrate interior noise levels of 45 dB(A) CNEL. Through implementation of this regulatory framework, exterior traffic noise impacts associated with new development requiring discretionary approvals and interior traffic noise impacts for both ministerial and discretionary projects would be less than significant.

With respect to rail noise, the PEIR concludes that although noise-sensitive receivers would be located in proximity to railroad operations, PEIR Figure 6.3-3 shows that vehicle traffic noise from I-5 would generate noise levels exceeding 70 CNEL, which far-exceed the contribution of noise from railroad operations. In addition, as discussed above, interior noise impacts for all projects, including ministerial projects, would be less than significant because applicants must demonstrate compliance with the

LETTER

RESPONSE

	<p>Q-9 (cont.) relevant interior noise standards through submission and approval of a Title 24 Compliance Report. Therefore, noise level impacts resulting from trolley and train operations would be less than significant.</p> <p>Q-10 See response to comment Q-9.</p> <p>Q-11 Comment noted. This comment does not suggest an inadequacy in the analysis of the PEIR.</p>
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NOTICE TO PROSPECTIVE RESIDENTS

You should be aware of the following issues related to this residence:

1. This residence lies very close to the Rose Canyon Fault. Some scientists have predicted that rupture of this fault could result in an earthquake of magnitude 6.5-6.8; others believe the magnitude could be greater than 7.0. Either might result in liquefaction of the ground under this residence. The timing of such an earthquake is not known. Residents should take all appropriate steps to mitigate the damage and danger from a nearby severe earthquake: securely fastening to walls all appliances and furniture which can topple, etc.
2. This residence will be subjected to high sound levels. The high ambient sound level is mainly due to traffic on I-5. There are also intermittent, even higher sound levels because of street traffic (e.g., motorcycles) and trains. Windows should be kept closed and HVAC systems should run constantly to minimize the deleterious effects of these sound levels.
3. This residence is in a "Pollution Zone" and will be subjected to high levels of particulates and other pollution, mainly due to nearby I-5 traffic and railroad operations. This residence is either in, or adjacent to and downwind of, a Proposition 65 warning area because of railroad operations. The pollutants to which this residence will be subjected include diesel emissions and tire tread wear dust, both of which are presumed carcinogens. To minimize the health effects of such pollution, windows should be kept closed and HVAC systems, with high-quality filters, should run constantly. Sensitive receptors (children, people with impaired lung capacity, etc.) should be outdoors no more than necessary.

**Morena Specific Plan
Draft Program Environmental Impact Report (PEIR)**

- Q-12 Comments (2 of 5): Making a bad situation for private vehicles even worse
PEIR Section 6.2: Transportation and Circulation
Appendix B: Transportation Impact Analysis

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“The goal of modern public transit planning is not to make public transit rapid, affordable and convenient. Rather, the goal is to make transit by private automobile so unpleasant that people will turn to public transit as the least bad alternative.”

-Anonymous

- Q-13 From PEIR Appendix B, Pages 110-111:

9.6.4 Freeway Ramp Meters

Metered ramp locations are anticipated to exceed the meter rate and result in a delay **greater than 15-minutes** [emphasis added] at the following locations, resulting in a significant impact:

- I-5 NB On-Ramp / Clairemont Drive (AM)
- I-5 SB On-Ramp / Sea World Drive / Tecolote Road (AM & PM)

Mid-Density Alternative

- I-5 NB On-Ramp / Clairemont Drive (AM)
- I-5 SB On-Ramp / Sea World Drive / Tecolote Road (AM & PM)

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

- Q-14 The Morena Specific Plan, according to the PEIR, represents a significant step toward the goal of making a bad situation for private vehicles even worse. It is well established that I-5 in the Morena corridor (running roughly between CA-52 and I-8) is one of the most congested freeway segments in the San Diego region. The Morena Specific Plan adds about 10,000-14,000 additional residents to this already-overcongested stretch of I-5. It will also have a significant impact on congestion of I-8, another overcongested freeway.

- Q-12 Comment noted. This comment does not suggest an inadequacy in the analysis of the PEIR.

- Q-13 This comment restates language from PEIR Appendix B. This comment does not suggest an inadequacy in the analysis of the PEIR.

- Q-14 The comment makes statements about freeway traffic in the Specific Plan area. For a discussion of traffic-related impacts, see Section 6.2.3 of the PEIR.

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RESPONSE

<p>Q-15 The thrust of the report is well exemplified by the discussion of Freeway Ramp Meters on pages 110-111 of Appendix B (see above), where it is pointed out that the time to enter I-5 from the Clairemont and Tecolote on-ramps as a result of implementation of the Morena Specific Plan is projected to be greater than 15 (!) minutes – a significant step toward making transit by private automobile unbearable. Good work, planners!</p> <p>Q-16 The old saying is, “Alas, the shortages will be shared by the peasants.” In the current context, the saying is, “Alas, the increased traffic congestion resulting from unmitigated increased traffic, due in turn to continued dumb growth, will be shared by San Diego residents.”</p> <p>Q-17 I will not bother to deal with the details of the 25 pages in the PEIR, or in the 113 (!) page Appendix B, undoubtedly produced at considerable expense by grateful and generous consultants. However, a couple of additional comments on specifics which exemplify the quality of the work of the consultants and the thinking of City planners:</p> <p>Q-18 1. PEIR Appendix B, pages 89-90 estimates that implementation of the Specific Plan will add about 20,000 additional vehicle trips per day to the current number. And City planners pretend that a goal of this Plan is to decrease vehicle use and decrease greenhouse gas emissions!!</p> <p>Q-19 2. Some of the numbers in the Trip Generation Comparison (Table 9-1) are suspect. Two examples: - City planners assert that the number of daily trips associated with Nursery will go from 905 to zero. One wonders if they have told Armstrong Nursery it will be going out of business. - City planners assert that the number of daily trips associated with Restaurants will go from 1,369 to zero. Really?? [Note: they also project that the total number of trips associated with Quality Restaurants and High Turnover Restaurants will stay about the same.]</p>	<p>Q-15 The comment restates conclusions reached in the PEIR. For a discussion of traffic-related impacts, see Section 6.2.3 of the PEIR.</p> <p>Q-16 Comment noted. This comment does not suggest an inadequacy in the analysis of the PEIR.</p> <p>Q-17 Comment noted. This comment does not suggest an inadequacy in the analysis of the PEIR.</p> <p>Q-18 The comment restates findings from the Draft PEIR Appendix B and makes a statement regarding decreases in vehicular use and GHG emissions. The new and increased residential density is located in close proximity to new and existing Light Rail Trolley lines, and will be supported by new roadway connections and facilities that improve bicycle and pedestrian mobility. The mix of land uses and new multimodal facilities planned in the Morena Corridor Specific Plan will increase transportation options for residents, employees, and visitors. While the additional developments may lead to an increase in the overall total vehicular trips and GHG emissions, the potential for shorter trips and the provision of additional transportation options may contribute to a reduction in vehicle miles travelled per capita; thus, reducing GHG emissions per capita. The comment does not raise any specific issues regarding the analysis provided in the Draft PEIR. The comment will be included as part of the Final PEIR for review and consideration by decision makers prior to the final determination regarding the proposed project.</p> <p>Q-19 The comment questions the numbers provided in the Trip Generation Comparison Table (Table 9-1 of the Transportation Impact Analysis), specifically questioning trips associated with nursery and restaurant land uses. The location where the Armstrong Nursery is currently located will be designated as Streetfront Commercial. New land use designations do not preclude existing businesses from maintaining their operations. The trip generation rate for a nursery is equal to that of Streetfront Commercial (40 trips/1,000 square feet); therefore, the traffic generated by the nursery or any other allowed commercial business that may go in are accurately captured in the analysis.</p>
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**Morena Specific Plan
Draft Program Environmental Impact Report (PEIR)**

- Q-20 Comments (3 of 5): A funny: San Diego has “sufficient water supplies”
PEIR Section 6.14: Public Utilities
Appendix H: Water Supply Assessment for the Linda Vista Community Plan Amendment
- Walter J. Deal
2252 Frankfort Street
San Diego, CA 92110
wjdeal@san.rr.com
- Q-21 The perspective of the City bureaucracy is well summarized by the statement on page 38 of Appendix H:
- In summary, this Report demonstrates that there are sufficient water supplies over a 25-year planning horizon to meet the projected demands of the Project as well as the existing and other planned development projects within the PUD service area in normal [sic], dry year, and multiple-dry year forecasts.
- In a way, it’s nice that the San Diego Public Utilities Department has a sense of humor and can give San Diegans a good laugh as they say “there are sufficient water supplies.”
- Presumably, the Public Utilities Department was told what answer they should come up with, and then produce 40+ pages of assorted numbers to obscure the real fact of San Diego’s water supply. The fact is that San Diego does not have enough water capacity to endure even a mild drought without pain, much less a multi-year drought. The recent short-term drought brought on water restrictions for San Diego residents – does the City bureaucracy think our memories are that short? Adding 10,000-14,000 more people, as envisioned in the Plan, can do nothing but exacerbate the situation.
- The old saying is, “Alas, the shortages will be shared by the peasants.”
- Q-22 In the current context, the saying is, “Alas, the water shortages resulting from unmitigated increased water demands, in turn due to continued dumb growth, will be shared by San Diego residents.”

Q-20 Continuation of comments noted.

Q-21 As discussed in Section 6.14.3, a Water Supply Analysis was prepared for the project to address build-out of the Linda Vista Community Plan area, including proposed land use changes within the Linda Vista portion of the Specific Plan area, and is included as Appendix F to the PEIR. As no land use changes are proposed within the Clairemont Mesa portion of the Specific Plan area, there would be no additional demand for water within that portion of the Specific Plan area, and a Water Supply Assessment was not prepared for this portion of the Specific Plan area. The Water Supply Assessment determined that there is sufficient water planned to supply the estimated annual average usage associated with build-out of the Linda Vista Community Plan including land use changes proposed with the Specific Plan. The projected water demands were estimated to be 5,104,328 gpd or 5,717.7 acre-feet per year. In the City’s 2015 UWMP, the planned water demands within the Linda Vista Community Plan were identified as 5,104,512 gpd or 5,717.8 acre-feet per year. Therefore, there would be no net unanticipated water demand.

Q-22 See response to comment Q-21.

**Morena Specific Plan
Draft Program Environmental Impact Report (PEIR)**

Q-23 Comments (4 of 5): Pedestrian and bicycle safety – a criminally negligent Plan?

Walter J. Deal
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From the PEIR: Pages S-2 to S-3

The primary objectives for the proposed project are:

...

- Enhance multi-modal connectivity between neighborhoods; Mission Bay Park; and the Clairemont Drive, Tecolote Road, and Morena/Linda Vista trolley stations.
- Create a complete mobility system that promotes access and increases safety for pedestrians, bicycles, and transit.

Q-24 Pedestrian and bicycle safety would normally not be a subject in an EIR for comment. However, since the subject was mentioned in the PEIR, and increased safety was asserted to be a priority, the failure of the PEIR and the Specific Plan to address what I and many others feel is the least-safe issue with respect to pedestrian and bicycle safety cannot stand unchallenged.

The first draft of the Morena Specific Plan, developed by City staff and property owners along Morena Blvd., became public in 2014. There have been many concerns and much uproar about the varied incarnations of this Plan, and its resolution in the usual direction of the conflict between: (1) quality of life of San Diego residents and (2) dumb growth and consequent profits for property owners and developers.

Q-25 There is a more important issue than money, campaign contributions, etc. relevant to the Morena Specific Plan and the Mid-Coast Trolley Boondoggle: the life-and-death danger to trolley riders from crossing (on foot or by bicycle) overpasses over I-5 from the trolley stops at Clairemont Drive and Tecolote Road to Mission Bay Park. There are also dangers to bicyclists sharing the road with vehicles on East Mission Bay Drive, which I have also addressed, and have noted the obvious and inexpensive solutions (mainly, a bike path in the unused space between I-5 and East Mission Bay Drive).

Both I and many others have argued that these overpasses are dangerous for pedestrians and bicyclists. Many people in the neighborhood will not cross these overpasses on foot or by bicycle, and will not allow their children to cross these overpasses unless accompanied by an adult. I know personally of one severe, life-changing bicycle-automobile accident on the Clairemont overpass; there may well have been others.

As best I can tell, these concerns expressed by me and others have been given short shrift by City and SANDAG planners, or at least not addressed in any of the planning documents. Copies of my correspondence (which have received no replies) are available on request.

Q-23 Continuation of comments noted.

Q-24 Bicycle and pedestrian safety is discussed in Section 6.2.3 of the PEIR. Specifically, the PEIR addresses whether the project would conflict with adopted policies, plans, or programs supporting alternative transportation. Inherent to this discussion is the construction of pedestrian and bicycle facilities that would support improved pedestrian facilities and increased safety for pedestrians and bicyclists.

Q-25 The proposed plan includes a number of recommendations to prioritize pedestrian travel and strengthen bicycle facility connections throughout the project area. See PEIR Section 6.2.3 (Issue 2) for a detailed list of the project's component parts relating to pedestrian and bicycle improvements (see also PEIR Figure 3-7). Overall, policies in the proposed plan support coordination with SANDAG on the planning and implementation of regional bicycle facilities, support increased bicycle comfort and safety, repurposing rights-of-way for bicycle facilities, and bike sharing.

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Q-26

A few additional comments (note: I am not an attorney, but ...):

1. Normally, public officials are shielded from individual criminal responsibility and civil liability from their official actions. However, case law is changing, and public officials have even been charged with manslaughter in the Flint cases. Reckless and callous disregard of and indifference to public safety may well be the term that applies to the failure of public officials to take into account and mitigate the danger these overpasses present to pedestrians and bicyclists who rode the trolley to these stops, danger of which the public officials were aware.

2. When a criminal trial or civil suit resulting from such an accident begins, Exhibit 1 is likely to be page 40 from the Morena Corridor Specific Plan. The figure (labeled "Conceptual design of enhanced Class II bicycle facility along Clairemont Drive at the I-5 Overpass bridge") at the bottom of this page deliberately deceptively shows peacefully coexisting pedestrians, bicyclists, and vehicles on an overpass with no intersections. It does NOT show what happens at intersections (including two on-ramps and two off-ramps) on or adjacent to the overpasses – that's where the greatest danger is. The omission has emphatically been pointed out to City planners, who have not responded.

On page 40 of the Specific Plan, the relevant Policies are stated to be

3.4.6. Coordinate with Caltrans to improve pedestrian and bicycle connections along the Clairemont Drive freeway bridge to provide access from the Clairemont and Linda Vista community to Mission Bay Park. This could include 'squaring-up' the southbound Interstate-5 on- and offramps at Clairemont Drive/East Mission Bay Drive.

3.4.7. Coordinate with Caltrans and SANDAG to improve pedestrian and bicyclist mobility along the Clairemont Drive/East Mission Bay Drive bridge and the Sea World Drive/Tecolote Road bridge over I-5 to connect with existing bicycle facilities and to provide access to Fiesta Island.

This "coordination" should have been an integral part of the development of the Specific Plan starting 4-5 years ago, not an afterthought to (perhaps) be addressed later, most likely well after the trolley is operational and pedestrians and bicyclists are put in danger. Also, mobility is obviously not the same as safety, and safety should have been the first priority.

3. Separate pedestrian/bicyclist overpass bridges would have cost only a fraction of a percent of the cost of the Mid-Coast Trolley Boondoggle. The cost to the City and SANDAG for just one accident (actual and punitive damages plus the cost of litigation) may well be more than the cost of the overpasses. It may be found to be criminally unconscionable that pedestrian/bicycle overpasses were not included in planning for the trolley.

The failure of City planning staff to address, acknowledge, or respond to these safety concerns can be presumed to indicate that they have been given their marching orders. At this point, all we as citizens can do is to have it in the public record that planners and public decision-making officials were made aware of the dangers, so that these officials, as well as the City and SANDAG, will not have plausible deniability and can individually be held accountable for both criminal and civil liability if our fears and concerns become reality.

Q-27

A summary of my opinions follows:

Q-26

Comment noted. This comment does not suggest an inadequacy in the analysis of the PEIR.

Q-27

Comment noted. This comment does not suggest an inadequacy in the analysis of the PEIR.

It is my opinion that:

1. The current configurations of the overpasses over I-5 at Clairemont Drive and Tecolote Road are unsafe for pedestrians and bicyclists. There will be significantly increased pedestrian and bicyclist traffic over these overpasses when the trolley is operational, as people take the trolley and go to Mission Bay Park.
2. Implementation of increased, up-to-date, safety measures for these overpasses, certified by traffic-safety experts, obviously should have been included in planning for the trolley. Adequate safety is likely to have required new pedestrian/bicyclist overpasses, which would have added a fraction of a percent to the cost of the overall project. City and SANDAG planners have been well aware of these issues for a number of years. However, no increased, up-to-date, safety measures for these overpasses were included in planning for the trolley operations.
3. If no action, or inadequate action, with respect to the safety of these overpasses is taken, it is likely there will be a severe accident involving a vehicle and a pedestrian or bicyclist on one of these overpasses.
4. The City, SANDAG, and all individuals involved in the development and approval of the Morena Specific Plan will have organizational and individual moral responsibility, civil liability responsibility, and potentially even criminal liability responsibility for such an accident. No individual involved in the development and approval of this Plan, from the lowest-level planner to the Mayor, can claim plausible deniability that they were unaware of the dangers to the public of these overpasses.

Note: If the Specific Plan moves into the approval process, this page will be distributed at appropriate public meetings to all decision-making officials (e.g., Planning Commissioners, City Council members, and the Mayor).

<p style="text-align: center;">Morena Specific Plan Draft Program Environmental Impact Report (PEIR)</p> <p>Q-28 Comments (5 of 5): The Morena Specific Plan and the PEIR advocate increased population, increased congestion, increased demands on already-inadequate water supplies, and – apparently – decreased jobs. This is what City planners call “a comprehensive long-term plan.”</p> <p>Walter J. Deal 2252 Frankfort Street San Diego, CA 92110 wjdeal@san.rr.com</p> <p>Q-29 Morena Corridor Specific Plan PEIR, Page 8-2</p> <p style="padding-left: 40px;">The proposed project serves as a comprehensive long-term plan for the physical development of the Specific Plan area, and is intended to manage and address future growth within the Specific Plan area. The current population within the Specific Plan area is estimated to be 2,659 residents and 10,155 employees.... With the proposed project, the population would increase within the Linda Vista Community Plan area to an estimated 14,000 residents and 4,181 employees at full build-out. [Note: the population within the entire Morena Specific Plan area is projected to be about 16,300 (PEIR page 10-3). Also, it’s difficult to interpret the employee numbers since the projected total for the Specific Plan area apparently isn’t given, nor is the current number of employees in the area of the Linda Vista Community Plan (??). I have no idea if the incoherence of the numbers given is deliberate.]</p> <p style="padding-left: 40px;">That is, the project proposes to add 10,000 to 14,000 residents and appears to decrease the number of jobs by about 6,000 employees (see note above for the difficulty in verifying this figure – in any case, increasing jobs in the area of the Specific Plan is obviously not a priority to City planners).</p> <p>Q-30 The fact is that what San Diego needs is jobs, especially high-quality jobs for young people. Demographic projections show that the only age cohort in San Diego County that is expected to grow in the next 10-15 years is senior citizens. San Diego needs young people to increase its vitality, support its cultural features, etc. Every year, young people come to San Diego to attend its colleges and universities. If you ask them, about 90% would say they would like to stay in San Diego after graduation. But there just aren’t enough high-quality jobs available to meet their talents. So they either stay in San Diego and become baristas, or go somewhere else; e.g., Texas.</p> <p>Q-31 To repeat: What San Diego needs is jobs, especially high-quality jobs for young people. San Diego needs the next Qualcomm and the next Illumina, not more relatively low-paying and low-skills hotel, retail, and restaurant jobs. However, the hospitality industry has a great deal of control over the City government for all the obvious reasons. The City government plays to the tune of who pays the piper.</p> <p>Q-32 The Morena Specific Plan will create lots of substandard level (almost unfit for habitation) housing, with convenient trolley access for its residents to work in the hospitality industry downtown and the retail</p>	<p>Q-28 Continuation of comments noted.</p> <p>Q-29 Comment noted. This comment does not suggest an inadequacy in the analysis of the PEIR. Clarification has been added to the PEIR that the estimated build-out population is approximately 14,000 for the Linda Vista portion, and approximately 16,300 for the Specific Plan area as a whole.</p> <p>Q-30 Comment noted. This comment does not suggest an inadequacy in the analysis of the PEIR.</p> <p>Q-31 Comment noted. This comment does not suggest an inadequacy in the analysis of the PEIR.</p> <p>Q-32 Comment noted. This comment does not suggest an inadequacy in the analysis of the PEIR.</p>

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<p>centers in the UTC area. It will do nothing to meet the needs of workers in the high-tech, high-wage job centers. In fact, by increasing congestion, it will make life more difficult for workers in those fields.</p> <p>Q-33 Instead of a housing-oriented plan, the Morena Specific Plan could have envisioned creation of a high-tech jobs hub, with the area being a place workers would take the trolley <i>to</i> instead of a place to commute <i>from</i>; City planners were well aware of such possibilities. With appropriate mitigation, housing could be put at the top of Clairemont Mesa, not in the Pollution Zone adjacent to the rail lines and I-5. However, City planners, working with developers and the owners of developable properties, 4-5 years ago came up with a housing proposal focused on substandard housing. One has to give them points for persisting with this plan, flawed and non-innovative as it is.</p> <p>Q-34 The goal of City planners clearly is to develop San Diego on the model of Los Angeles: lots of apartment buildings, with windows that never open, adjacent to freeways; lots of low-wage, low-skills jobs in legacy industries; and where people spend much of their mental energy trying to figure out how to minimize their exposure to near-perpetual gridlock. That's what City planners have as their vision for "America's Finest City."</p> <p style="padding-left: 40px;">For all sad words of tongue and pen, The saddest are these, "It might have been." - John Greenleaf Whittier</p>	<p>Q-33 Comment noted. This comment does not suggest an inadequacy in the analysis of the PEIR.</p> <p>Q-34 Comment noted. This comment does not suggest an inadequacy in the analysis of the PEIR.</p>
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LETTER

RESPONSE

Letter R

From: Ted Yates
To: [PLN_PlanningCEQA](#)
Subject: Morena Corridor Specific Plan Project number 582608 / SCH 2016101021
Date: Saturday, September 08, 2018 3:39:20 PM

Hi,

- R-1 I am not sure why I am sending this since no one in San Diego government cares in the least what residents think, but I must still cast a vote.
- R-2 This plan adds 6,000 dwelling units to one street. Maybe the residents of 100 of those will take the trolley. The other 5900 will be jammed into the one remaining traffic lane. They might as well be sitting in traffic because San Diego is trying to reduce the number of parking spaces required for new construction. 100 foot buildings, limited parking, one lane and 6,000 more units in one neighborhood. What could go wrong?
- R-3 This is a horrible plan. Growth is fine. Change is expected. This is just way, way too far.
- Ted Yates

- R-1 Introductory comment noted. This comment does not suggest an inadequacy in the analysis of the PEIR.
- R-2 For a discussion of traffic-related impacts associated with the Specific Plan, see Section 6.2.3 of the PEIR. With respect to building heights, this comment does not suggest an inadequacy in the analysis of the PEIR.
- R-3 Comment noted. This comment does not suggest an inadequacy in the analysis of the PEIR.

LETTER

RESPONSE

Letter S

From: Katherine Malchiodi
To: [PLN PlanningCEQA](#)
Subject: Morena Corridor Specific Plan number 582608/SCH No. 2016101021
Date: Sunday, September 09, 2018 2:34:02 PM

S-1

We encourage the San Diego city planners to stand with the residents of the Morena Corridor for both the Clairemont and Linda Vista neighborhoods in their development and land use projects. We do not support any structures built over 30ft. in height nor an increase of densities unless agreed upon and recommended by the Clairemont/Linda Vista planning boards/ad hoc committees. These groups have worked hard for 3 years and we are disappointed that the city planners have ignored them and basically just "checked the box". It seems to have fallen on deaf ears. We love our communities and know what is best! Please pay attention! Do the right thing!

Paul and Katherine Malchiodi

S-1

Comment noted. This comment does not suggest an inadequacy in the analysis of the PEIR.

Letter T

Rebecca Malone, Environmental Planner
City of San Diego Planning Department
9485 Aero Drive, MS 413
San Diego, CA 92123

Morena Corridor Specific Plan
Project number: 582608 / SCH number: 2016101021
Clairemont Mesa and Linda Vista
Council District 2/Zapf

- T-1 Thank you for this opportunity to ask questions and to provide comments about the plan.
 5.10.3.4
 I am particularly concerned as to what the city intends to do with climate change situations such as planning for coastal flooding, tsunamis, earthquakes on the Rose Canyon Fault, dam failures impacting the San Diego River Basin etc. I am also concerned about the nuclear waste being stored at San Onofre which would impact all of San Diego County and the fact that the storage bins being used haven't passed tests to do what they are supposed to do (this is prior to them being filled).
 5.10.3.7
- T-2 Brush management needs to be a priority in neighborhoods as well as in open spaces. If someone has a yard that is now all dried grasses, weeds, trash, etc. it is more than an annoyance, it is a fire danger for the neighborhood. What happens in this situation?
 Also, the dead skirts on the palm trees along the freeway and at Mission Bay are fire torches waiting for a spark. I saw one of our neighborhood palms light up like a massive firecracker when lightning struck during the fire of 2007. These palms haven't been trimmed for many, many years.
 5.11
- T-3 Control of runoff contaminants need to be a priority for action between San Diego and Tijuana. The Tijuana River needs to be corrected because of coastal contaminants impacting San Diego

- T-1 Potential impacts related to climate change is discussed in Section 6.8 of the PEIR. Additional discussions related to flooding, tsunamis, earthquakes and dam failures are discussed in Sections 6.11, and 6.12. The conditions at San Onofre are outside the scope of this project and PEIR.
- T-2 The SDMC includes regulations pertaining to brush management (Section 142.0412) and construction materials for development near open space (Chapter 14, Article 5) to minimize fire risk. Brush management is required in all base zones on publicly or privately owned premises that are within 100 feet of a structure and contain native or naturalized vegetation. The City requires submittal of brush management plans for all new development, which are intended to reduce the risk of significant loss, injury, or death involving wildland fires. Future development proposals within the Specific Plan area would be reviewed for compliance with all City and Fire Code requirements aimed at ensuring the protection of people or structures from potential wildland fire hazards, including brush management regulations.
- T-3 Relationships between San Diego and Tijuana are outside the scope of this project and PEIR. For a discussion of project-related water quality impacts, see Section 6.11 of the PEIR.

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	<p>and Mexico's water for humans and marine life. It is not close to Mission Bay but algae growth and tides can spread from the area.</p> <p>5.11.1.1</p> <p>T-4 The proposed location for the routing of the Pure Water San Diego Program doesn't make sense to me for several reasons. Planning the route through the Rose Canyon Fault makes no sense for moving untreated sewage through neighborhood communities. Earth quakes, coastal water rising etc. seem to suspend the first decision on routing to a more prudent route using the Highway Alternative route up Highway 163 and then Highway 805. Should a malfunction of the plant, earthquake, etc. cause a break in the system, 5.11.2.1 the Streambed Alteration Program would be impacted.</p> <p>5.11.3.2 & 3</p> <p>T-5 Runoff Management Program requires the city to protect and improve the water quality of rivers, bays and ocean water. The Tijuana River sewage, rising ocean temperatures as well as the Pure Water Program and the San Onofre storage containers are all disasters waiting to happen.</p> <p>As a lifelong San Diegan I recall when Mission Bay was wetlands. I read an article some time ago about hazardous waste being put into barrels and buried at the south end of Mission Bay. What was buried, are those barrels still intact? Does anyone care or monitor them? Have they rusted out? Mission Bay and Imperial Beach consistently earn report card ratings of "F". Is there some way that Mission Bay can have an additional opening to circulate and flush through this water park? The very warm waters in the summer turns the bay into a bacterial Petri dish. This recreational zone needs to be protected and improved.</p> <p>5.12.1& 4</p> <p>T-6 Earthquake Fault Zoning Act – Has a geologic report, prepared by a State of California registered geologist, been done in regards to the Pure Water planning?</p> <p>Also, in this area of the plan, "PF-Q.2 maintain or improve the integrity of structures to protect residents and preserve communities" – Beyond building permits when they were first built, does anyone do follow-up studies due to erosion on the canyon rim apartments and condos above Tecolote Canyon above Field and Mt Acadia streets?</p> <p>6.1-1 Table</p> <p>T-7 Item 2.3.8 Support the use of shared parking structure between users??? Not ...shared structure parking between uses.</p> <p>T-8 Item 2.3.16 Provide a continuous transition that increases building scale (?) from West Morena to Is this about height, square footage, what?</p>	
	<p>T-4 The City's Pure Water program is outside the scope of this project and PEIR. For a discussion of project-related water quality impacts, see Section 6.11 of the PEIR.</p> <p>T-5 See responses to comments T-3 and T-4.</p> <p>T-6 Potential impacts associated with earthquakes are discussed in Section 6.12 of the PEIR. A geotechnical and geologic reconnaissance report was prepared by a state-registered geologist and included as Appendix E to the PEIR.</p> <p>T-7 The language of Policy 2.3.8 included in the PEIR is correct. No revisions are necessary.</p> <p>T-8 Building scale refers to building elements and details as they proportionally relate to each other and to humans. Increased building scale means building would get larger in mass from West Morena Boulevard to the western portion of the Tecolote District.</p>	

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T-9	Item 2.4.3 variety of housing types ... special needs, , etc? for example if a developer builds 30 units what percentage would be available to non-monied parties – a percentage, number or what.? Who regulates this?	T-9	Housing would be provided to support all members of the community as required by City regulations.
T-10	Item 2.4.5 at one point the Morena planning group was interested in opening up the end of Knoxville Street for direct access to West Morena Blvd. Is the city interested in this improvement?	T-10	The Morena Corridor Specific Plan, consistent with Clairemont Community Plan, recommends Knoxville Street to connect West Morena Boulevard and Morena Boulevard. This connection will improve circulation for all modes of travel and provide access to the Tecolote Station. The Morena Corridor Specific Plan identifies the extension of Knoxville Street as Improvement 3; a conceptual rendering can be seen in Figure 3-5 of the Specific Plan.
T-11	Item 2.4.6 term is misleading, would this be better worded as “Consider vacating and sale of excess right-of-way”	T-11	The language of Policy 2.4.6 included in the PEIR is correct. No revisions are necessary.
T-12	Item 3.1.1 In the intro to the item- ... “vacations” changed to vacancies. In a. “vacating” to inform....	T-12	The language of Policy 3.1.1 included in the PEIR is correct. No revisions are necessary.
T-13	Item 6.1.1 g. ... installing roundabouts where needed to reduce fuel consumption and traffic speeds.	T-13	The language of Policy 6.1.(g) included in the PEIR is correct. No revisions are necessary.
T-14	Chapter 3; Mobility - suggest making Knoxville Street open to West Morena Blvd with light. Also, consider roundabouts on Milton Street. With cutting back the lanes on Clairemenot Drive, the trolley station at Clairemont Drive impacting access to freeways and surrounding streets, more people are turning to GPS to route them through neighborhood surface streets. Milton Street, and the street that feed into it are all experiencing high speeds. Milton and Burgener are 30mph but people are driving 45mph and up. The city would like people to bike everywhere including kids going to school, for exercise, etc. I walk daily in the Bay Park area and it's not safe to try to cross a street. People are jetting down Cowley Way, Deerpark, Grandview and Arnett. A woman was stuck and died in 2017 as she was crossing Burgener to pick up her kindergartener. Many more accidents are predicted.	T-14	Comment noted. This comment does not suggest an inadequacy in the analysis of the PEIR.
T-15	Chapter 5; Recreation – In our planning meeting over the last several years the Morena Planning Group stressed that access to Mission Bay Park is very precarious to people out walking, walking dogs and kids, pushing strollers, walking with a walker or wheel chair or riding a bicycle. The northbound 5 exit is the designated side for pedestrian access and the task of going over to the Mission Bay is truly life threatening. We suggested a more user friendly bridge from the area of the trolley station or the “village” area of Bay Park at Ashton Street would be a much safer solution with a ramp up and down (not stairs) for all users.	T-15	As noted in Section 5.2, Transportation and Circulation, of the PEIR, the Specific Plan identifies policies to coordinate with Caltrans to provide bridge connections from the Specific Plan area to Mission Bay Park and improve cyclist mobility over the Clairemont Drive/East Mission Bay Drive and Sea World Drive/Tecolote Road Bridge. Ultimate construction of a bridge would require further feasibility analysis including site-specific environmental analysis and engagement with the community at the time a specific project is proposed.

Letter U

From: Serene Tan
To: [PLN_PlanningCFOA](#)
Cc: [V8 Holdings](#)
Subject: PROJECT NAME: Morena Corridor Specific Plan | PROJECT No.: 582608 / SCH No. 2016101021
Date: Wednesday, September 12, 2018 3:39:24 PM

Dear Rebecca,

U-1 I hope this email finds you well.

My name is Serene Tan. I am writing to you on behalf of V8 Holdings LLC, which owns the buildings located at [1102-1108 Morena Blvd](#), and City Cabinet Center (a division of Hammer-Lock Construct Corp) which is the current business occupant of said buildings. I would like to send you our written comments regarding the Morena Corridor Specific Plan. The page references indicated below are with respect to the latest draft Specific Plan as of August 2018.

U-2 **Mobility Improvements**

1. Improvement 7: Cushman Ave Extension towards West Morena Blvd (Page 33)
2. Improvement 16: Morena Blvd Vacation between West Morena Blvd and Morena Plc (Page 38)

Currently, our back street, Naples Plc, is narrow for any delivery or pick-up trucks to enter or exit. With the above improvements, Cushman Ave will become the street that intersects Naples Plc (instead of Morena Blvd). Under Improvement 7, there is a proposal to add two bicycle lanes along Cushman Ave (see figure 3-9 on Page 33). With the street design currently proposed in the Draft Specific Plan, we are concerned about the turning radius for vehicles entering and exiting Naples Plc. This is important especially for larger vehicles like delivery trucks, so that they can negotiate turns when exiting Naples Plc onto Cushman Ave or entering Naples Plc from Cushman Ave. As a business, we want to make sure that our 40 ft delivery trucks will be able to negotiate the turn when entering or exiting Naples Plc from/to the main roads. This is a shared concern by our neighboring shops that also rely on delivery trucks for their goods.

To help you visualize, I have attached a screenshot of Improvement 7 where we marked out the route our truck would take under the proposed improvement. We want to make sure that the truck will be able to enter or exit Naples Plc from/onto Cushman Ave before getting onto West Morena Blvd.

U-3 **Structure Height**

We share the same views with many of the residents that the maximum structure height for the Tecolote Village District should be reduced. Right now, the Draft Specific Plan proposes a maximum structure height of 100 ft for the Tecolote Village District and 45 ft for the Design District (which is where we are located). We would like to suggest that the maximum structure height for both districts be comparable, so that the extreme 100 ft building height is reduced and the occupancy

U-1 Introductory comment is noted.

U-2 Improvements 7 and 16 would maintain the existing width and curved alignment of Naples Place. Previous consideration was given to intersect Naples Place with Cushman Avenue; however, there are concerns with introducing new conflicts with pedestrians and cyclists. This does not align with the policy in the Morena Corridor Specific Plan of providing safe and efficient travel of people and goods. The Morena Corridor Specific Plan is a planning document in which only circulation element roadways are analyzed at a planning level. The proposal to intersect Naples Place to Cushman Avenue would require design specifics and operational improvements that can be considered at a later time near the design and implementation phase. Furthermore, there is nothing indicated in the Morena Corridor Specific Plan that would preclude the extension of Naples Place; however analysis has not been conducted to determine its feasibility as part of this plan.

U-3 Comment noted. This comment does not suggest an inadequacy in the analysis of the PEIR.

LETTER

RESPONSE

U-4

density is spread to the buildings in the Design District by increasing the maximum height limitation of the buildings in the Design District. Perhaps the maximum structure height for the Tecolote Village and Design Districts could be set at 75 ft and 65 ft respectively.

We hope that the City of San Diego Planning Department will take our comments into consideration. We would really appreciate it if you could keep us in the loop on any updates or changes to the Morena Corridor Specific Plan—we would be happy to discuss with you on the best way forward to ensure that our concerns are received and addressed.

Thank you and we hope to hear from you.

Best regards,
Serene

Serene Tan
serenet@citycabinetcenter.com



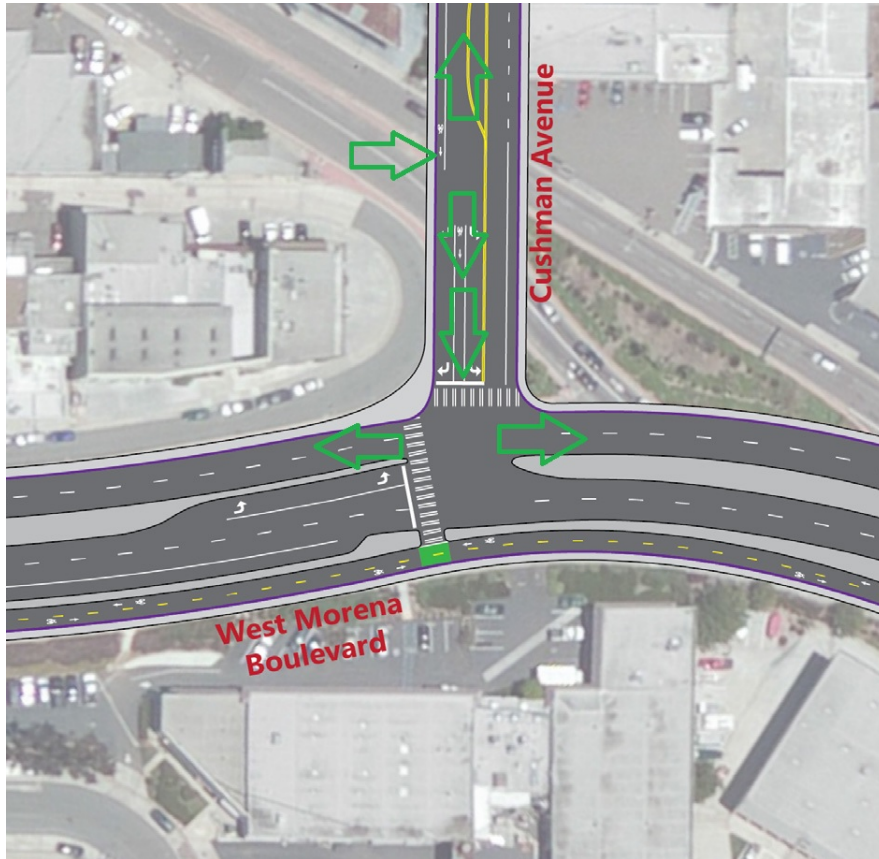
CITY CABINET CENTER
Division of Hammer-Lock Construct Corp.

1108 Morena Blvd
San Diego CA 92110-3809
tel: 619.521.2875

www.CityCabinetCenter.com

Your kitchen and bath specialist

U-4 Conclusions to comments noted.



Letter V

STATE OF CALIFORNIA—CALIFORNIA STATE TRANSPORTATION AGENCY

EDMUND G. BROWN Jr., Governor

DEPARTMENT OF TRANSPORTATION

DISTRICT 11
4050 TAYLOR STREET, MS-240
SAN DIEGO, CA 92110
PHONE (619) 688-6960
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www.dot.ca.gov



Making Conservation
a California Way of Life.

September 12, 2018

11-SD-5

PM VAR

Morena Corridor Specific Plan
DPEIR / SCH#2016101021

Ms. Rebecca Malone
City of San Diego
9485 Aero Drive, MS 413
San Diego, CA 92123

Dear Ms. Malone:

V-1 Thank you for including the California Department of Transportation (Caltrans) in the environmental review process for the Draft Program Environmental Impact Report for the Morena Corridor Specific Plan located near Interstate 5 (I-5) and Interstate 8 (I-8). The mission of Caltrans is to provide a safe, sustainable, integrated and efficient transportation system to enhance California's economy and livability. The Local Development-Intergovernmental Review (LD-IGR) Program reviews land use projects and plans to ensure consistency with our mission and state planning priorities.

Caltrans has the following comments:

V-2 The proposed Morena Corridor Specific Plan would increase residential density in Linda Vista by redesignating and rezoning land to allow for transit-oriented development adjacent to the future Tecolote Road Trolley Station and the existing Morena/Linda Vista Trolley Station.

V-3 The Morena Corridor Specific Plan traffic impact analysis (TIA) utilized HCM 2000 and Synchro 9 software. HCM 2010 methodology was utilized in the subject TIA at locations where intersection geometries were not compatible with HCM 2000 methodology. Caltrans recommends future traffic analysis and evaluation for developments use the latest available software, currently Highway Capacity Manual V6 and Software HCS 7.

V-4 **Complete Streets and Mobility Network**

Caltrans views all transportation improvements as opportunities to improve safety, access and mobility for all travelers in California and recognizes bicycle, pedestrian and transit modes as integral elements of the transportation system. Caltrans appreciates the City's efforts to support improved transit accommodation through the provision of Park and Ride facilities, improved bicycle and pedestrian access and safety improvements, ramp improvements, and other enhancements that promotes a complete and integrated transportation system. Early coordination

*"Provide a safe, sustainable, integrated and efficient transportation system
to enhance California's economy and livability"*

V-1 Introductory comment is noted.

V-2 The comment correctly summarizes the basic transit-oriented proposal.

V-3 The comment "recommends future traffic analysis and evaluation for developments use the latest available software, currently Highway Capacity Manual V6 and Software HCS 7." Comment noted. The comment does not raise any specific issues regarding the analysis provided in the Draft PEIR. The comment will be included as part of the Final PEIR for review and consideration by decision makers prior to the final determination regarding the proposed project.

V-4 Comment noted. Future development projects affecting Caltrans facilities would include coordination with Caltrans.

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RESPONSE

Ms. Rebecca Malone
September 12, 2018
Page 2

with Caltrans, in locations that may affect both Caltrans and the City of San Diego, is encouraged.

- V-5 Please consider incorporating enhanced visibility crosswalks as part of the mitigation plan for this project, where appropriate.
- V-6 As part of the mitigation plan for this project, please consider incorporating bicycle-friendly train track crossing improvements, where appropriate.
- V-7 TRANS 6.2-1: Clairemont Drive, from I-5 NB ramps to Denver Street (Impact 6.2-1)– Widen this roadway to a 6-Lane Prime Arterial. *Listed as significant and unavoidable.* Please consider incorporating the following improvements as part of the mitigation plan for impact TRANS 6.2-1: (A) Short-term stripping improvements for bicycle accommodation, and/or (B) a longer-term solution that would provide a bicycle and pedestrian facility on the south side of the Clairemont Drive bridge structure.
- V-8 **Land Use and Smart Growth**
The City should continue to coordinate with Caltrans to implement necessary improvements at intersections and interchanges where the agencies have joint jurisdiction, as well as coordinate with Caltrans as development proceeds and funds become available to ensure that the capacity of on/off-ramps are adequate.
- P. 6.2-19: *"The Specific Plan also identifies policies to coordinate with Caltrans to provide bridge connections from the Specific Plan area to Mission Bay Park and improve cyclist mobility over the Clairemont Drive/East Mission Bay Drive and Sea World Drive/Tecolote Road Bridge."*
- Caltrans approvals will be needed for any encroachment work in State Right of Way. Please continue to include the Caltrans in future discussions regarding potential design improvements as described in this section.
- V-9 If you have any questions, please contact Roy Abboud, of the Caltrans Development Review Branch, at (619) 688-6968 or by e-mail sent to roy.abboud@dot.ca.gov.

Sincerely,


JACOB ARMSTRONG, Chief
Development Review Branch

*"Provide a safe, sustainable, integrated and efficient transportation system
to enhance California's economy and livability"*

- V-5 The comment recommends consideration for "incorporating enhanced visibility crosswalks as part of the mitigation plan" Policy 3.3.2 of the Morena Corridor Specific Plan states, "Incorporate high visibility continental crosswalks at signalized intersections." Additionally, page 108 of the Transportation Impact Analysis (provided as Appendix B of the Draft PEIR), identifies interim implementation measures, including the following: "Consider a mid-block pedestrian connection across West Morena Boulevard, between Vega Street and Buenos Avenue, with a continental crosswalk and pedestrian hybrid beacon. This location should meet Pedestrian Hybrid Beacon (signal) warrants prior to installation."
- V-6 The comment recommends consideration for "incorporating bicycle-friendly train track crossing improvements, where appropriate." Comment noted. The comment does not raise any specific issues regarding the analysis provided in the Draft PEIR. The comment will be included as part of the Final PEIR for review and consideration by decision makers prior to the final determination regarding the proposed project.

LETTER

RESPONSE

	<p>V-7 As mitigation to Impact 6.2-1, the comment recommends consideration for "incorporating the following improvements as part of the mitigation plan for impact TRANS 6.2-1: (A) Short-term striping improvements for bicycle accommodation, and/or (B) a longer-term solution that would provide a bicycle and pedestrian facility on the south side of the Clairemont Drive bridge structure." Both of these mitigation measures were evaluated and considered as part of the planning process; however, they were deemed inappropriate for the roadway due to the free right-turn movements entering and exiting the I-5 on- and off-ramps. The Morena Corridor Specific Plan includes Policy 3.4.6, "Coordinate with Caltrans to improve pedestrian and bicycle connections along the Clairemont Drive freeway bridge to provide access from the Clairemont Drive and Linda Vista community to Mission Bay Park. This could include 'squaring-up' the southbound Interstate-5 on- and off-ramps at Clairemont Drive/East Mission Bay Drive."</p> <p>Additionally, Morena Corridor Specific Plan Policy 3.4.7 reads, "Coordinate with Caltrans and SANDAG to improve pedestrian and bicyclist mobility along the Clairemont Drive/East Mission Bay Drive bridge and the SeaWorld Drive/Tecolote Road bridge over I-5 to connect with existing bicycle facilities and to provide access to Fiesta Island." Considering the bridge is a Caltrans facility, and the City does not have jurisdiction over the referenced locations, the improvement was listed as policy language rather than a feature of the plan.</p> <p>V-8 Comment noted. Future development projects affecting Caltrans facilities would include coordination with Caltrans.</p> <p>V-9 This concluding remark is noted.</p>
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LETTER

RESPONSE

Letter W

From: Patricia Rolla
To: [PIN_PlanningCEQA](#)
Subject: 37 ft height on Morena Blvd.
Date: Thursday, September 13, 2018 2:37:08 PM

- W-1 I live at 2320 Denver St. and currently have a lovely view of the bay from my Westfacing second storey windows. An increase to 37 ft. from the 30 ft height limit will block my view completely. There is not an increase of grade between Morena Blvd. and Denver St. that helps when more height is added for architectural purposes. 37 feet heights do not merit the loss of our view and the effect it would have on our property value . One of the great things about Bay Park is that you can still have a view at the bottom the hill. You will be destroying the reason we chose to buy our home here. I think multi family apartments or town homes within the 30 ft. height limit could be built in the 2300 block of Morena and not block our view.
- W-2 We are already suffering congestion in our neighborhood from people who work at Rescue located on Morena Blvd., as they do not provide parking for the 50 -100 people who work there.
- W-3 Please put yourself in our shoes. We have a large and long-time investment in the Bay Park community.
- Richard and Patti Rolla
 2320 Denver St Bay Park 92110

- W-1 No land use changes are proposed for the Clairemont Mesa portion of the Specific Plan area, and the existing 30-foot height limit within that area would remain.
- W-2 As detailed in Chapter 3.0 of the PEIR, new and improved parking is designated throughout the Specific Plan area. Additionally, the Specific Plan includes policies to promote structured parking. Additionally and with respect to adequate parking, planning for high-density residential development near high-quality transit is a focus of the City General Plan City of Villages Strategy, the City's Climate Action Plan, and is consistent with SANDAG strategies identified in The Regional Plan. The intention would be the promotion of transit and the lessening of the need for individual automobile use throughout the Specific Plan area.
- W-3 Concluding comment is noted.

LETTER

RESPONSE

Letter X

From: Bashant, Wendy
To: [PLN PlanningCEQA](#)
Cc: [CouncilMember Lorie Zapf](#)
Subject: The Moreno corridor 30 foot limit
Date: Thursday, September 13, 2018 9:34:44 AM

Dear Council-woman Zapf:

X-1

I am concerned about the discussion to increase the 30 foot limit building height limit in Bay Park and Bay Ho. I recently bought a house in Bay Ho and the view was reflected in the cost. To allow city heights (100 feet) in single-home-owner areas is a deep concern. Any height increases must keep in mind the area homes, the increased traffic and the local available resources. Please heed your community property owners concerns.

Sincerely,

*Wendy Bashant, Ph.D.
VP/Dean Student Life
225 Cedar Street,
San Diego, CA 92101
wbashant@cwsl.edu*

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SCHOOL OF LAW | San Diego

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X-1

Comment noted. This comment does not suggest an inadequacy in the analysis of the PEIR.

Letter Y



401 B Street, Suite 800
San Diego, CA 92101-4231
(619) 699-1900
Fax (619) 699-1905
sandag.org

September 17, 2018

File Number 3300300

Ms. Rebecca Malone
City of San Diego Planning Department
9485 Aero Drive, MS 413
San Diego, CA 92123

Dear Ms. Malone:

Subject: Morena Corridor Specific Plan (Project No. 582608) Draft Program
Environmental Impact Report

Thank you for the opportunity to comment on the Morena Corridor Specific Plan Draft Program Environmental Impact Report (PEIR). The San Diego Association of Governments (SANDAG) appreciates the City of San Diego's efforts to implement the policies included in San Diego Forward: The Regional Plan (2015 Regional Plan) that emphasize the need for better land use and transportation coordination. These policies will help provide people with more travel and housing choices, protect the environment, create healthy communities, and stimulate economic growth. SANDAG comments are based on policies included in the 2015 Regional Plan and are submitted from a regional perspective.

Smart Growth

This project is located in three Smart Growth Opportunity Areas (SGOAs) identified on the Smart Growth Concept Map: an Existing/Planned Community Center (SD CM-6), Town Center (SD LV-1), and Mixed-Use Transit Corridor (SD CM-7). SANDAG appreciates that the City of San Diego has prioritized transit-oriented development and land use changes that support the Smart Growth Concept Map and the 2015 Regional Plan. A key goal of the 2015 Regional Plan is to focus growth in SGOAs. Development in these areas supports a sustainable and healthy region, a vibrant economy, and an outstanding quality of life for all. Please continue facilitating access to planned transit routes and services within the plan area.

Mobility Hub

SANDAG, in coordination with the City of San Diego and Metropolitan Transit System, is developing a Mid-Coast Corridor Mobility Hub Implementation Strategy that provides recommendations for improving mobility in the Morena Corridor area. Consider developing policies, such as the following, that support mobility hub implementation and improve connections to the future Mid-Coast Trolley stations:

MEMBER AGENCIES

Cities of
Carlsbad
Chula Vista
Coronado
Del Mar
El Cajon
Encinitas
Escondido
Imperial Beach
La Mesa
Lemon Grove
National City
Oceanside
Poway
San Diego
San Marcos
Santee
Solana Beach
Vista
and
County of San Diego

ADVISORY MEMBERS

Imperial County
California Department
of Transportation
Metropolitan
Transit System
North County
Transit District
United States
Department of Defense
San Diego
Unified Port District
San Diego County
Water Authority
Southern California
Tribal Chairmen's Association
Mexico

Y-1 This introductory comment is noted.

Y-2 Support for the project location is noted.

Y-3 The City appreciates SANDAG's input into mobility-related policies. Many of these policies are already included in the Specific Plan.

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- In addition to the provision of carshare and bikeshare programs, facilitate and promote the use of other shared mobility services, such as on-demand rideshare, microtransit, and scootershare within the Specific Plan area. Consider pursuing partnerships and pilot projects with on-demand rideshare (e.g., Uber, Lyft, Waze Carpool) and microtransit or neighborhood electric vehicle service providers that can enhance connections from the Tecolote Road and Clairemont Drive stations to major universities and recreational destinations.
- To reduce the demand for parking, expand upon shared parking strategies by developing a comprehensive parking-management plan that considers parking-management strategies such as priced parking and designated parking for carpools, vanpools, and other shared mobility options. Smart parking technologies also can help manage parking demands.
- In support of the 2014 San Diego Traffic Signal Communication Master Plan, consider enhancing pedestrian and street infrastructure investments by encouraging the use of smart signal and smart intersection technologies that can have multimodal benefits.
- Enhance wayfinding signage to facilitate connections to transportation services and other destinations in the community.
- Electric, shared mobility services require fast charging points to support operations. Consider siting publicly accessible electric vehicle charging infrastructure near transit and at key community destinations to ensure a connected charging network.
- Where possible, explore the provision of flexible curb space to accommodate passenger pick-up and drop-off for kiss-and-ride, taxi cabs, on-demand rideshare, and shuttle services. Ensure that shared mobility services have designated space within the public right-of-way. This could include dedicated curb space near major destinations in the community and near the Tecolote Road and Clairemont Drive stations.

Additional information on the Mid-Coast Mobility Hub Implementation Strategy is available at sdforward.com/mobility-planning/mcMobilityHub.

Other Considerations

Y-4

SANDAG has a number of resources that can be used for additional information or clarification on topics discussed in this letter. The following resources can be found on our website, sandag.org:

- Designing for Smart Growth, Creating Great Places in the San Diego Region
- Parking Strategies for Smart Growth
- Trip Generation for Smart Growth
- Mid-Coast Mobility Hub Implementation Strategy
- SANDAG Regional Parking Management Toolbox
- Riding to 2050, the San Diego Regional Bike Plan

Y-4

The City appreciates SANDAG resources available for planning and future project use.

LETTER

RESPONSE

Y-5

When available, please send any additional environmental documents related to this project to:

Intergovernmental Review
c/o SANDAG
401 B Street, Suite 800
San Diego, CA 92101

We appreciate the opportunity to comment on the Morena Corridor Specific Plan Draft PEIR. If you have any questions, please contact me at (619) 699-1943 or seth.litchney@sandag.org.

Sincerely,



SETH LITCHNEY
Senior Regional Planner

SLI/KHE/kwa

Y-5 These concluding remarks are noted.

LETTER

RESPONSE

LETTER	RESPONSE
<p>September 18, 2018</p> <p>Rebecca Malone, Environmental Planner City of San Diego Planning Department 9485 Aero Drive, MS413 San Diego, CA 92123</p> <p>SUBJECT: COMMENTS IN RESPONSE TO THE MORENA CORRIDOR SPECIFIC PLAN DRAFT PROGRAM ENVIRONMENTAL IMPACT REPORT(PEIR)</p> <p>Z-1 The Clairemont Community Planning Group (CCPG) respectfully submits the following comments regarding the Morena Corridor Specific Plan draft PEIR.</p> <p>We wish to concentrate our comments on our two greatest areas of concern identified in the PEIR: Significant impacts identified to Transportation and Circulation (6.2.5), as well as significant impacts to Visual Effects and Neighborhood Character (6.7-1 & 6.7-2).</p> <p>Transportation and Circulation</p> <p>Z-2 Project Objectives as listed in the Morena Corridor Specific Plan (3.2) which include to “enhance multi-modal connectivity between neighborhoods (and) Mission Bay Park” and to “create a complete mobility system that promotes access and increases safety for pedestrians (and) bicycles” are not adequately addressed in the traffic study nor the Transportation & Circulation component of the PEIR. “Improve access to Mission Bay Park” is also a guiding principle of the Specific Plan.</p> <p>Z-3 In the PEIR only vehicular traffic is thoroughly assessed and is identified as a significant and unavoidable impact to all of the intersections and street segments which a pedestrian or bicycle must use to travel from Clairemont area to Mission Bay Park over the Clairemont Drive overpass. It is dangerous travel at present with numerous vehicular intersections to cross. With increased daily vehicular trips (DVT) added by the Specific Plan land use changes in Linda Vista area (which were assessed in the PEIR), as well as DVT added by the Balboa Station Area Specific Plan increased density (which was not incorporated into this PEIR) the Clairemont Drive overpass access to Mission Bay Park will become significantly more dangerous and will definitely be problematic for residents and transit riders. This is not in compliance with the project objectives.</p> <p>Z-4 The Clairemont community has from the outset of the Morena Corridor Specific Plan process voiced this concern and has insisted that a separate pedestrian/bicycle bridge be identified because that is the only way to truly mitigate for the danger of the numerous points of interaction with vehicles on the Clairemont Dr. overpass. Yet this was glaringly absent from the current version of the Specific Plan and the impacts were not addressed in the PEIR. We support item 1 of Planning Director Hansen’s memo to Councilmember Zapf dated 9/17/18: “the plan will include language supporting a pedestrian and bicycle bridge between Mission Bay Park and the Specific Plan area over the I-5 freeway.” We expect that analysis of this feature will be included in the PEIR.</p> <p>Z-5 As an additional consideration, it is our understanding that our community’s adjacency to Mission Bay Park is being considered for future park development credits through equivalencies. If a pedestrian/bicycle bridge were identified and planned for in this Specific Plan, the idea of utilizing the accessibility of Mission Bay Park as park equivalency for our park deficient community would seem more logical. Without safe and convenient access to Mission Bay we would object to any consideration of park equivalencies.</p> <p>Page 1 of 3</p>	<p>Z-1 Introductory comments are noted.</p> <p>Z-2 Multi-model connectivity and promoting safety for pedestrians/bicyclists are addressed in both the Transportation Impact Analysis and PEIR. The Transportation Impact Analysis discusses signal modifications, proposed crosswalk/sidewalk improvements, and bicycle lanes that would enhance safety and promote alternative modes of transportation throughout the Specific Plan (see Transportation Impact Analysis Sections 4.2 and 4.3). Section 6.2 of the PEIR further analyzes the improved pedestrian and bicycle facilities finding that implementation of the project would support improved pedestrian facilities and increased safety for pedestrians by strengthening pedestrian connections and providing for improved pedestrian mobility throughout the study area.</p> <p>Z-3 See response to comment Z-1.</p> <p>Z-4 As noted in Section 5.2, Transportation and Circulation, of the PEIR, the Specific Plan identifies policies to coordinate with Caltrans to provide bridge connections from the Specific Plan area to Mission Bay Park and improve cyclist mobility over the Clairemont Drive/East Mission Bay Drive and Sea World Drive/Tecolote Road Bridge. Ultimate construction of a bridge would require further feasibility analysis including site-specific environmental analysis and engagement with the community at the time a specific project is proposed.</p> <p>Z-5 See response to comment Z-4.</p>

LETTER

RESPONSE

<p>Z-6 Furthermore, none of the Transportation and Circulation mitigation measures (6.2.5) for the above addressed roadways and intersections (Clairemont Dr and it's intersections from Denver St to West Mission Bay Dr.) are presently incorporated into the draft Specific Plan. Nor are there any mitigation measures identified for roadways that are presently failing (LOS F), specifically Morena Blvd from where it splits from West Morena Blvd to where it rejoins Morena Blvd (including the Knoxville, Tecolote and Buenos intersections). This area includes the high vehicular traffic associated with the Tecolote Rd/Sea World Dr. overpass which is again a currently dangerous pathway for pedestrians and bicyclists to access Mission Bay Park. The overpass was not assessed from the vantage point of pedestrians/bicyclists in the PEIR and there are no safety improvements identified for these dangerous areas in the Specific Plan.</p> <p>Z-7</p> <p>Z-8 It is contradictory under the current version of the Specific Plan to advance Transit Oriented Development plans with objectives stating goals of increasing pedestrian and bicycle travel without realistically assessing and intervening for safety by those modes of travel to the pre-eminent destination in the area, Mission Bay Park!</p> <p>Z-9 Just south of the above described area are new planned roadways which if constructed will open at LOS of F. Such foreseeable and inappropriate planning for transportation is unconscionable.</p> <p>Z-10 The only significant transportation change recommended by the current draft Specific Plan and studied in the PEIR in the Clairemont area is to change Morena Blvd from Gesner St south to the Linda Vista community from a 4-lane Major Arterial to a 3-lane Collector. The principal reason for this is to provide for a 2-way cycle track along the west side of the roadway. While the community is supportive of safe bicycle and pedestrian infrastructure there is great concern that that configuration will dramatically impact vehicle travel (LOS A degraded to LOS C or D) and will not appropriately provide safe bicycle transit because it would necessitate cyclists to cross the increased traffic of Morena Blvd to access the residential and commercial areas along the east side of the roadway. This corridor includes very few existing signalized intersections that would allow safe passage across Morena Blvd. Again the PEIR did not take any steps to evaluate prospective use of this cycle track.</p> <p>Z-11 The above numerous objections regarding Transportation components of the draft Specific Plan and the pedestrian/bicycle infrastructure assessments in the PEIR must be addressed prior to finalization. We support item 2 of Planning Director Hansen's memo to Councilmember Zapf dated 9/17/18: "the plan will be amended to retain 4 lanes in the segment of Morena Blvd from Ingulf St to Knoxville St including 2 northbound lanes, 2 southbound lanes, and left turn pockets at intersections." We expect further information and analysis of pedestrian and bicycle safety measures in this area.</p> <p>Visual Effects and Neighborhood Character</p> <p>Z-12 Regarding other "significant and unavoidable" impacts, the following comments relate to Visual Effects and Neighborhood Character (Impact 6.7-1 & 6.7-2). The current draft Specific Plan identifies the Tecolote Station area for dramatic increases in both density and height (with TODEP density of up to 109 du/acre and height up to 100 feet). This is most definitely significant, but it is not unavoidable. The Tecolote Station is adjacent to the freeway and less than a quarter mile away from the extensive single-family neighborhoods of Bay Park and Overlook Heights. This is completely in conflict with several of the Specific Plan Guiding Principles of ensuring "that new development respects general mass, volume and scale of the existing built environment," to "improve visual quality", and to "preserve public views". The Visual Effects and Neighborhood Character impacts would be significantly lessened in the Low-Density Alternative. We recognize item 3 of Planning Director Hansen's memo to Councilmember Zapf dated 9/17/18: "The Transit Oriented Development Enhancement Program within the plan will be</p> <p style="text-align: right;">Page 2 of 3</p>	<p>Z-6 The Specific Plan is not required to include the mitigation measures proposed within the PEIR. The PEIR includes proposed mitigation measures that would become part of the project's conditions of approval (through the adopted MMRP).</p> <p>Z-7 CEQA does not require mitigation measures to be proposed for existing conditions. The PEIR includes transportation-related mitigation measures that aim to address significant direct and cumulative impacts associated with implementation of the project.</p> <p>Z-8 The Specific Plan addresses land use and mobility changes within the boundary of the Specific Plan area. See response to comment Z-4.</p> <p>Z-9 One guiding principle of the Specific Plan is to improve access to Mission Bay Park. New improvements within the Specific Plan area would provide connections (including urban trail connections) to Mission Bay Park. The Specific Plan also encourages coordination with MTS and SANDAG to provide shuttle service to the park (Policy 3.4.10).</p> <p>Z-10 Traffic impacts are discussed in Section 6.2 of the PEIR. As the bounding intersections of the proposed roadway segments would operate at an acceptable LOS, it is expected that the roadway segments would also operate at an acceptable LOS.</p> <p>Z-11 Refer to response Z-2.</p> <p>Z-12 See response to comments Z-1 through Z-11.</p> <p>Z-13 See response to comment Z-11.</p>
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amended to remove the ability to seek a maximum height of 100 feet in the Tecolote Village District and to remove the ability to seek a maximum height of 65 feet in the Morena Station District through a future Planned Development Permit process. The proposed 'by-right' height limit of 45 feet will remain." We insist that, besides limiting by-right heights, relative densities also be reduced.

Additional Issues

Z-14 Another Project Objective (3.2) is to "promote high residential density and employment opportunities consistent with the City of Villages strategy and the CAP". It is clear the current draft Specific Plan will promote the former by potentially adding 10,000 new residents, but it does so at the expense of more than 6,000 jobs lost (see pages 8-2, paragraph 2). Again, this is an unconscionable contradiction.

Z-15 Finally, we wish to reinforce that the current Draft Specific Plan, which would result in numerous significant and unavoidable impacts, is not the environmentally superior alternative. The Low-Density Land Use Plan alternative for the Linda Vista portion of the Specific Plan would still meet the Specific Plan objectives (of creating higher-density residential in proximity to transit) with substantially less significant impacts to the communities of Clairemont and Linda Vista.

Conclusion

Z-16 In summary, the Clairemont Community Planning Group acknowledges that some increased residential density within walking distance of the new Mid-Coast Trolley stations is warranted. We appreciate and support the modifications to the draft Morena Corridor Specific Plan delineated in the memo from Planning Director Hansen to Councilmember Zapf dated 9/17/18 and we hope this signals a more collaborative approach to planning efforts with our community.

Sincerely,



Naveen H. Waney, AIA
Chair of Clairemont Community Planning Group

cc: Mike Hansen, Director, Planning Dept, City of San Diego
Michael Prinz, Senior City Planner, City of San Diego
Mayor Kevin Faulconer
Councilwoman Lorie Zapf, District 2, City of San Diego
Councilwoman Barbara Bry, District 1, City of San Diego
Councilman Chris Ward, District 3, City of San Diego
Councilwoman Myrtle Cole, District 4, City of San Diego
Councilman Mark Kersey, District 5, City of San Diego
Councilman Chris Cate, District 6, City of San Diego
Councilman Scott Sherman, District 7, City of San Diego
Councilman David Alvarez, District 8, City of San Diego
Councilwoman Georgette Gomez, District 9, City of San Diego
City of San Diego Planning Commission
CCPG Morena Corridor Specific Plan Ad Hoc Subcommittee Members
CCPG Board Member

Page 3 of 3

Z-14 As discussed in Chapter 8, implementation of the proposed project would create employment opportunities throughout the districts intending to "facilitate the economic well-being of locally owned and operated businesses and create ample job opportunities for residents in the Specific Plan area. These policies serve to facilitate expansion and new growth of high-quality employment opportunities with access to transit."

Z-15 Chapter 10 of the PEIR provides a "reasonable range of alternatives" pursuant to CEQA Guidelines Section 15126.6. The alternatives included in the PEIR permit informed decision making and public participation because there is enough variation amongst the alternatives that provide a reasonable range. As required under CEQA, the alternatives would avoid or minimize significant impacts associated with the project while also meeting the project objectives. The alternatives are compared to the impacts of the project and are assessed relative to their ability to meet the basic objectives of the project.

Z-16 These concluding remarks are noted.

LETTER

RESPONSE

Letter AA

From: Jessica Bowlin
To: [PLN_PlanningCEQA](#)
Cc: [Steve B](#)
Subject: Morena Corridor Specific Plan: Project #582608 / SHC 20161021
Date: Wednesday, September 19, 2018 5:13:31 PM

Morena Corridor Specific Plan: Project Number: 582608

SCH NO - 2016101021

Dear Mayor and City Representatives,

- AA-1** As citizens, families, and advocates for Clairemont, we strongly oppose the language on p. 327 of the PEIR that does not allow for the character of the community to be preserved. We specifically oppose the language that allows for higher building limits than 30 feet. This has verbally been promised by Lori Zaph and other city officials, but this particular language allows a loophole to change the entire Clairemont Mesa area without the consent of the citizens.
- AA-2** The increased traffic congestion impacts quality of life in the community for residents that already live here and those passing through the major through-fares on Genessee and Balboa. The citizens want to maintain the 30 foot height limit and the character of our neighborhood.
- AA-3**
- AA-4** In addition, my neighbors and our household opposes the City's Planning Department "Height Concepts" proposal for rezoning of commercial property of the Home Depot on Balboa Avenue to residential spaces. We are an older neighborhood, and the need to access a major hardware in proximity is a necessity in the neighborhood as something is always in need of replacement. While there is an Ace Hardware in Clairemont Square, the store does not supply the magnitude of the items needed that Home Depot does. The other nearest major hardware stores are in other majorly congested areas in Mira Mesa and Mission Valley. Removal of this store will strongly impact the quality of life for existing residents, not to mention the impact on lost jobs in the community.
- AA-5** For similar reasons, we also oppose the rezoning of commercial space to residential on Clairemont Drive and Balboa Avenue. It is the mayor's priority to handle homeless problems, and removing the Good Will is a job loss to those recovering from homelessness and addiction. In addition, Harvest Market is also located in that shopping Center, and it is one of the only locally owned grocery stores left in the neighborhood. Not only will we be sitting in traffic for the additional proposed homes, the loss of jobs will also impact our residents.
- AA-6** As working parents, any additional time sitting in traffic is time that we cannot spend with our families, I'm sure we can all agree that healthy communities begin with healthy families. The last thing the residents of Clairemont want is another congested Rosecrans and University Town Center area. Please take into consideration the residents of Clairemont and prioritize growth in another area of the city.

Kindest Regards,

Stephen and Jessica Bowlin and residents of Clairemont

- AA-1** The commenter's opposition to the language of the PEIR pertaining to character of the community is noted, as well as the opposition to increased building height allowance of greater than 30 feet. As discussed in Sections 6.7.3 and 6.7.4, impacts associated with neighborhood character were determined to be significant and unavoidable due to increased heights and development intensity that could conflict with existing neighborhood character.
- AA-2** For a discussion of traffic-related impacts, see Section 6.2.3 of the PEIR.
- AA-3** Refer to response AA-1.
- AA-4** The Specific Plan does not propose any zoning changes to the commercial properties associated with the commercial center located at the intersection of Balboa Avenue and Genessee Avenue.
- AA-5** The Specific Plan does not propose any land use or zoning changes along Balboa Avenue. In addition, the portion of Clairemont Drive within the Specific Plan area and adjacent properties would retain the existing zoning designations under the Specific Plan of RM-3-7, CN-1-2, and CC-1-3.
- AA-6** The commenter's concern with regards to additional time sitting in traffic is noted. For a discussion of anticipated traffic-related impacts associated with traffic circulation within the Specific Plan area, see Section 6.2.3 of the PEIR.

LETTER

RESPONSE

Michael and Marissa Colburn
1422 Everview Rd.
San Diego, CA 92110

Letter AB

Rebecca Malone, Environmental Planner
City of San Diego Planning Department
9485 Aero Drive, MS 413
San Diego, CA 92123

September 19, 2018

Re: Morena Corridor Specific Plan 582608 / SCH No. 2016101021

Dear Ms. Malone,

AB-1 I wish to register the following comments to this plan, and am doing so in writing before the 10/1/2018 deadline as stated in public documents.

AB-2 First and foremost, I find the assumptions for daily commuting and other transit needs rely excessively on the exclusive use of mass transit to suffice all needs, be they for work, shopping, school, medical, or other. Mass transit in the region remains in a nascent state, unable to meet the real day-to-day needs for most. If a single route happens to pass reasonably close to both your departure and arrival point, it is a very fortunate arrangement. Today's reality is far different, and will likely be the case for decades. This doesn't mean that local planners should give up on the concept, but it also doesn't give license to ignore the health and well being of entire communities, some of which will bear the brunt of ill-conceived plans for excessive housing density, regardless of income level, while ignoring the realities of our present, individual vehicle-centric system that requires careful provisioning of roadway infrastructure, as well as parking. To write assumptions into a plan that call for anything less than one car per residential unit is absurd. The implementation of such plans will, in the end game, cause far more gridlock and parking headaches for everyone, new residents as well as many of us who have lived in the area for decades. As for the achievement of the city's greenhouse gas reduction goals, I have a hard time seeing how the achievement of such goals is promoted by forcing people to sit in traffic twice a day for their necessary commute, for the privilege of accessing the freeway which itself is also likely gridlocked. Again, mass transit trolley and bus routes are great, but likely applicable to less than 10% of the public's routine needs.

AB-3
AB-4
AB-5 As a long term owner/resident of the Overlook Heights Community, which I believe was initially subdivided almost 100 years ago, we have a vested interest in the area; i.e. we have "skin in the game". It is inconceivable to us how the introduction of thousands of largely (or exclusively) rental housing units will be a net positive for our community, regardless of income levels. There is a world of difference that is fully understandable, in

AB-1 Introductory comment noted.

AB-2 The future year traffic volumes were developed utilizing the anticipated land use quantities and standard industry practices and are accurately reflective of the anticipated land use and transportation network changes. Regarding parking, the Specific Plan does not propose to provide less than one car per residential unit. Parking requirements are dictated by the Municipal Code. There are also policies supporting the use of shared parking to efficiently meet parking needs in village areas.

AB-3 As discussed in Section 6.8 of the PEIR, greenhouse gas emissions would be greater for proposed land uses identified within the Specific Plan area when compared to build-out of the Specific Plan area based on the adopted community plan land uses. Emissions from all sources were found to increase from the adopted community plan land uses. The increase in GHG emissions would be due to the increased density of development that would be allowed within the Linda Vista portion of the Specific Plan area and associated GHG emissions. This increase in GHG would be a direct result of the increased density associated with implementation of CAP Strategies and the General Plan's City of Villages Strategy. Increasing residential and commercial density along transit corridors and Community Villages within a TPA would support the City in achieving the GHG emissions reduction targets of the CAP, and thus, impacts associated with GHG emissions were determined to be less than significant.

AB-4 Comment noted. This comment does not suggest an inadequacy in the analysis of the PEIR.

AB-5 Comment noted. This comment does not suggest an inadequacy in the analysis of the PEIR.

LETTER

RESPONSE

	<p>terms of pride of ownership; this is not to be misconstrued as a value judgment of renters vs. owners as individuals; it just “is”.</p>	
AB-6	<p>Overlook Heights, in contrast to other areas along the Morena Corridor, has very limited access to the major north/south and east/west corridors. We are permanently bounded on two sides by land uses that cannot (and should not) be changed, namely Tecolote Park, and the University of San Diego campus. Geography is also a factor, given the grades encountered that are likely a product of the Rose Canyon Fault Line. The third edge of our “triangle” includes all the streets we use every day, namely Viola St., Buenos Ave, Dorcas St. (one way only), and Cushman Ave. And all four of these connect directly to Morena Blvd. THAT’S IT! We have no other routes we can use to access the I-5/I-8 freeways. It doesn’t take much imagination to visualize the gridlock that will materialize every morning on Buenos Avenue, as drivers (yes, drivers) need to access I-5 northbound, as West Morena Bl. does not provide any direct access to the closest on ramp in that direction. The same can probably be said for West Morena southbound, as drivers access I-8 eastbound, which I do every work day, to commute to my Kearny Mesa office about seven miles away. The on ramp from Morena to I-8 east is already an engineering compromise, given the awkward jockeying that takes place as it combines drivers also attempting to depart the freeway for Morena northbound. ADDING THOUSANDS OF VEHICLES TO THIS MIX ON A DAILY BASIS IS A RECIPE FOR DISASTER. The minor road realignments/rearrangements in the plan will not address this issue adequately. Of course, anything can be solved with enough money, however, in my view, the infrastructure improvements to resolve these issues are likely not economic, and hence the responsible action to take is to abandon the plans for multiple thousands of units in the area of the corridor south of Tecolote Road, and north of the river, which require incredible structure heights of 90 feet or more to achieve, in favor of more modest density goals that can be attained with more modest structure heights in the 30 to 45 ft range. Increased density around the transit lines makes sense, but the plan in its current form goes far beyond what is reasonable and what the infrastructure will support, without regards to the existence of the extended trolley line.</p>	<p>AB-6 As discussed in Section 6.2 and the Transportation Impact Analysis completed for the project, the project is anticipated to generate an additional 22,528 ADT within the project study area. Circulation plans for the area referenced by the commenter would be modified under the Specific Plan. Refer to Specific Plan Figure 3-1 for an illustrative concept of future streets in Linda Vista. As shown in this graphic, an additional extension to West Morena Boulevard would be provided via the Sherman Avenue Extension. Additionally, as detailed in the PEIR Section 6.2.3, no significant impact was identified with build-out of the Specific Plan at the intersections of Morena Boulevard and Buenos Street, Morena Boulevard and Cushman Avenue, West Morena Boulevard and Buenos Street, and West Morena Boulevard and Cushman Avenue Extension. Additionally, no significant impact was identified for the I-5 northbound and southbound ramps at Tecolote Road. For a complete discussion of traffic-related impacts and associated mitigation measures, refer to Section 6.2 of the PEIR.</p>
AB-7		
AB-8	<p>There is another point I wish to make about the future. It is no secret that seniors are choosing in greater numbers to “age in place”, as opposed to downsizing or moving into multi-unit assisted care living. Or at least such moves are being deferred until a later age. It would be expected that the needs for Emergency Medical Services (EMS) to access homes in the Overlook Heights Community will increase, and of course when they respond, time is of the essence. Setting up a scenario where first responders are likely to be delayed significantly in daily commuting traffic is outright irresponsible, and completely ignores the needs of older residents, many of whom have called Overlook Heights home for decades, and can point to multiple generations of family in the same community, if not the same home.</p>	<p>AB-7 As future development proceeds consistent with the Specific Plan, appropriate infrastructure improvements would either be required to be installed concurrent with project development, if warranted, or development impact fees would be paid to ensure infrastructure needs are funded commensurate with the demand generated by development. Analysis of impacts to public services (police protection, fire protection, schools, libraries, and parks and recreation) are assessed in Chapter 6.13 of the PEIR.</p>
AB-9	<p>The working class community of Overlook Heights has a unique character, even as compared to what is colloquially known as “Bay Park”, to the north of Tecolote Creek. We have in front of us an opportunity to positively impact this character with mixed-use development, including businesses that the local and greater community will benefit</p>	<p>AB-8 Fire and life safety protection impacts were analyzed in Section 6.13.3 of the PEIR. Implementation of the proposed project could result in an increase in allowable development, which could result in additional residents and vehicles being added to the Specific Plan area and a change in response times. However, future facilities would be planned based on adopted General Plan Public Facilities Element standards detailed in Section 5.13.3 of this PEIR.</p>

LETTER

RESPONSE

	<p>AB-8 (cont.)</p> <p>Moreover, as future development is proposed within the Specific Plan area, individual projects would be subject to payment of Development Impact Fees, which would provide facilities financing in accordance with SDMC Section 142.0640. At the program level the proposed increase in population would not require that the SDFD construct new facilities. Any expansion of existing facilities or the development of a new facility would be subject to separate environmental review at the time design plans are available. Thus, implementation of the proposed project would result in a less than significant environmental impact associated with the construction of new facilities in order to maintain service ratios, response times, or other performance objectives related to fire/life safety protection services.</p> <p>AB-9 Comment noted. This comment does not suggest an inadequacy in the analysis of the PEIR.</p>
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LETTER

RESPONSE

from, along with MODEST residential housing numbers in the area of the corridor. What does “modest” mean? I don’t know exactly, but it does NOT mean multiple thousands of new units wedged into the area with little to no provision for the reality that just about every adult resident in the area will bring with them at least one private vehicle, with the intent of using it for their daily needs. I doubt that future residents will be required to promise to relinquish vehicle ownership/use in writing as a condition of their lease agreements. At least I hope not, as nobody will want to live under that type of authoritarian rule.

AB-10 PLEASE, PLEASE do not move ahead with the plan in its current form. Instead, do something smart, something that tomorrow’s residents, old and new, will be able to comment, “Wow, they really did this project the right way”! The people making the decisions may not live in the area, but we in the community have one shot at this; once it is done, there is no going back.

Sincerely,

Michael J. Colburn, PE
San Diego native and Overlook Heights resident

AB-10 Comment noted. This comment does not suggest an inadequacy in the analysis of the PEIR.

Letter AC

From: Ed Greene
To: [PLN PlanningCEQA](#)
Subject: Morena Corridor Specific Plan) and Number (582608 / SCH No. 2016101021)
Date: Thursday, September 20, 2018 10:42:08 AM

Rebecca

AC-1 Please keep the 30 foot height limit in place.

Increasing density of the Clairemont Drive Trolley stop only serves the wealthy

thank you

With warmest regards,

Ed :>)

Ed Greene

ListOwner & Founder of www.edsjoblist.com since 1999 in San Diego
"E-Mail Blasts of LifeSci Sales/FAS/Mktg Jobs from >50 Biotech Recruiters and >1000 small emerging companies"

my E-Mail: ed355333@Yahoo.com

My LINKEDIN:

<http://www.linkedin.com/in/edgreenelistownerofedsjoblist>

Going to Work at my office on "SEA DUTY" [a CALIFORNIAN 34 Long Range Cruiser]

EJL YouTube when I was living on BEANS:
<http://www.youtube.com/watch?v=cg6OiuZFDbU>

AC-1 Comment noted. This comment does not suggest an inadequacy in the analysis of the PEIR.

LETTER

RESPONSE

Letter AD

From: Al & Peg Lieb
To: [PLN PlanningCEQA](#)
Subject: Bay Park / Morena
Date: Thursday, September 20, 2018 5:30:16 PM

- AD-1 We do not want you to break the 30 foot height limit along the Morena corridor or to increase the density in the Clairemont Bay Park communities. Your plan is the exact opposite of what the majority of our residents have requested. The idea that more density lowers home prices has been disproved in LA, San Francisco, New York and every other city. Stop telling us what you think we want & listen to us.
- AD-2 Our freeways & local roads are already over-crowded. The trolley only could be used by people exactly on the path (not Mesa College, zoo, beach, airport or most places we need to go.) As proof, just look at the rush traffic on I-8 which services the communities from Santee, El Cajon & La Mesa & on all the way to downtown & to the border!
- AD-3 High rise buildings along Morena only help the builders and developers make great profit at the loss of views from all of Bay Park, Bay Ho and Overlook Heights. The density furthermore will make our presently overstressed streets, utilities, schools & other support facilities more stressed.
- AD-4
- AD-5 If you vote for buildings higher than 30' and/or increased density, you are voting for developers & builders and voting against the affected residents.

Allan and Peggy Lieb
 2232 Dunhaven St
 San Diego CA 92110

- AD-1 Comment noted. This comment does not suggest an inadequacy in the analysis of the PEIR.
- AD-2 For a discussion of traffic-related impacts, see Section 6.2.3 of the PEIR.
- AD-3 Potential impacts related to public views are addressed in PEIR Section 6.3.7, under Issue 1. As discussed in that section, the analysis concludes that potential impacts related to public views associated with build-out of Specific Plan land uses within the Linda Vista portion of the Specific Plan area including implementation of the TODEP would be significant.
- AD-4 For a discussion of associated traffic impacts, see Section 6.2 of the PEIR. For a discussion of impacts to public utilities, see Section 6.14 of the PEIR. For a discussion of impacts to schools and other public services, see Section 6.13 of the PEIR.
- AD-5 Comment noted. This comment does not suggest an inadequacy in the analysis of the PEIR.

Letter AE



September 20, 2018

Rebecca Malone, Environmental Planner
City of San Diego Planning Department
9485 Aero Drive, MS 413
San Diego, CA 92123

Re: Comment on Morena Corridor Specific Plan, Project No. 582608

Dear Ms. Malone,

AE-1

The University of San Diego has carefully reviewed the Draft Program Environmental Impact Report (DEIR) related to the Morena Corridor Specific Plan and respectfully requests that the following corrections be made to the DEIR:

- The table on page 3-9 describing development for the Morena Station District incorrectly lists the additional development increases for Tecolote Village, instead of Morena Station. Figure 3-1 on page 8, summarizing the Morena Station development, is correct. Page 3-9 should be corrected to be consistent with Figure 3-1.

AE-2

The University agrees with the concept of improving the Morena Corridor area, is grateful to the City for its hard work on the Plan, and looks forward to working with its neighbors and the City to implement the final version of the Plan.

Sincerely,

A handwritten signature in blue ink, appearing to read "Ky Snyder".

Ky Snyder
Vice President
University Operations

UNIVERSITY OPERATIONS
5998 Alcalá Park, San Diego, CA 92110-2492
P: (619) 260-2930

AE-1 The requested revision has been made to the table associated with the Morena Station District Proposed Land Use in Section 3.3.1 of the PEIR (Page 3-9).

AE-2 The commenter's support for the project is noted.


LETTER

RESPONSE

Letter AF

From: Jennifer Hunt
To: [PLN Planning/CEQA](#)
Subject: PROJECT NAME: Morena Corridor Specific Plan ---PROJECT No.: 582608 / SCH No. 2016101021
Date: Friday, September 21, 2018 4:42:17 PM

Greetings Rebecca,

- AF-1 I realized that comments must be received by September 17, 2018 to be included in the final document considered by the decision-making authorities. I attended the Walk Bike Places conference last week, and this deadline slipped under the radar.
- AF-2 Do you have the date of when this plan will be presented to the City Council (decision makers) for adoption? I would like to include some comments and concerns about **not increasing height limits for buildings near the trolley stops, the consideration of keeping Morena Blvd as 4 lanes of traffic and eliminating the planned bike facility.** This will be detrimental for the region if this moves forth.
- AF-3 How do you recommend the best way to provide official input moving forward? Thank you for your help.
- Sincerely,
- Jennifer Hunt
 Advocacy Coordinator
 San Diego County Bicycle Coalition
sdbikecoalition.org
- 
- Advocate. Educate. Celebrate.**
- City of San Diego – Ranked Top 10 [Best Places for Bikes](#) by People for Bikes!.

- AF-1 Although past the September 17, 2018 review period, the comment is included in the record for the project.
- AF-2 The project will first go to Planning Commission, Land Use and Environment Committee, and then City Council. The project is estimated to go to City Council in spring 2019.
- AF-3 Information on the Morena Corridor Specific Plan is available on the City's website:
- <https://www.sandiego.gov/planning/community/specificplans/morena-corridor>
- For questions or comments regarding the Morena Corridor Specific Plan, please contact Michael Prinz, Project Manager at mprinz@sandiego.gov or at (619) 533-5931.

LETTER

RESPONSE

Constance A. Biewer
1904 Illion Street
San Diego, CA 92110

Letter AG

23 September 2018

Rebecca Malone,
 Environmental Planner
 City of San Diego Planning Dept.
 9485 Aero Drive, MS 413
 San Diego, CA 92123

Subject: Project Name: Morena Corridor Specific Plan
 Project No.: 582608 / SCH No. 2016101021

Dear Ms. Malone,

AG-1

I have been involved in many of the public discussions regarding the Morena Corridor Specific Plan and read the Draft Program Environmental Impact Report (PEIR) for the Morena Corridor Specific Plan. In addition, I noted the revisions to the PEIR in a September 17, 2018 letter from Mike Hansen, Director, Planning Department to Councilwoman, Lorie Zapf.

I have been a resident in Bay Park since 2004. I purchased my home due to the 180 degree vistas from Shelter Island to Pacific Beach and the unobstructed views of Mission Bay and the Pacific Ocean—with a 30' zoning height limit. I have a vested interest in the proposed plans mentioned in the PEIR and would like to publicly comment, as follows:

AG-2

PROS:

1. I am for the trolley line and the trolley stations located off Morena Boulevard at Tecolote, Clairemont and Balboa Drives. San Diego needs to update its transportation options and the trolley is a good option.
2. I love my Bay Park community, my neighbors and the "vibe" that is in our water park.
3. I am for Affordable Housing but against any developers making "payment in lieu" fees to avoid providing affordable housing.

AG-3

CONS:

1. I am against any and all changes to zoning restrictions—specifically, the 30 feet to 45 feet affecting Bay Park residents and the 45 feet to 65 feet affecting Linda Vista residents. I purchased my home knowing that there was a 30 foot zoning limit. Change of even 15 feet

AG-1 Introductory comments noted.

AG-2 Comments noted. These comments do not suggest an inadequacy in the analysis of the PEIR.

AG-3 Comment noted. This comment does not suggest an inadequacy in the analysis of the PEIR.

LETTER

RESPONSE

<p>negatively affects current residents by reducing property values and limits the enjoyment of our vistas. The change in zoning height is not a necessity for the trolley and is not a necessity for affordable housing.</p> <p>AG-4 2. I am against the proposed 6-fold increase in density resulting from the zoning changes. Are you kidding me? This will change the fabric of our neighborhoods and make it much more of a commuter, transient hub. This density increase is not a necessity for the trolley.</p> <p>AG-5 3. I am against the ensuing traffic and parking issues which will be a direct result of the zoning height and density changes being proposed in the PEIR. The neighborhoods surrounding the trolley stations and multi-unit residences will be full of parked cars due to the limited parking spaces being offered by the stations and the developers. I worry about more cars traversing our neighborhoods in a rat run to avoid traffic pinch points (which will occur due to the proposed six-fold increase in density). I have a school directly across the street from me with lots of children, parents and teachers crossing the street to attend school. School children and traffic should never mix!</p> <p>FEARS:</p> <p>AG-6 1. When we first began public discussions regarding the Morena Corridor Specific Plan, the success of Little Italy was touted. I have friends who lived in Little Italy before revitalization. None of them live there anymore; they left! Their community was obliterated by commercialization and high rises. I do not want to live in a "Little Italy Look-Alike"!</p> <p>AG-7 2. After a public outcry within Bay Park, we were told that the Planning Department would "respect" our 30 foot zoning restrictions. What is being proposed in the PEIR is not respect! An increase to 45 feet is a "bust" of our current 30 foot zoning height limit.</p> <p>AG-8 3. Removing Land Use from the Morena Corridor Specific Plan Ad Hoc Sub Committee and placing it in the hands of the Clairemont Community Plan felt like a political ploy. Was it because the Ad Hoc Committee were not as amenable to the Planning Department proposals outlined in the PEIR while the Clairemont Community Plan had a more planning-friendly group which is more amenable to busting our zoning height limits? I think this is true.</p> <p>AG-9 4. The proposed high-rise condominium tower at the current Jerome's location was initially touted at 90 feet. It then rose to over 100 feet. Now, based on the September 17, 2018 letter from Mike Hansen to Lorie Zapf, is it now at 65 feet? I feel like the process contains smoke and mirrors so that I do not know what is being proposed! Let me be clear: I do not want any structures that exceed the 45 foot height zone in Linda Vista or the 30 foot height zone in Bay Park.</p> <p>AG-10 5. My fear is that any breach of the zoning heights will lead to "development creep". By this I mean, developers being granted height limit easements because another property just down the road was granted an easement to exceed the height limits. Development creep becomes a vicious cycle: greater heights, leading to increased densities resulting in worse traffic and more parking problems!</p> <p>AG-11 Based on the above fears, is it any wonder that I feel as if I have been misled, mollified and manipulated throughout the Morena Corridor Specific Plan process?</p>	<p>AG-4 Comment notes. Refer to PEIR Section 6.7.3 for a discussion of impacts to neighborhood character. As discussed in this section, a significant impact related to neighborhood character would occur as a result of future development within the Linda Vista portion of the Specific Plan area due to increased heights and development intensity that could conflict with existing neighborhood character. The comment does not raise an issue related to the adequacy of this analysis.</p> <p>AG-5 Comment noted. For a discussion of traffic related impacts, see Section 6.2 of the PEIR.</p> <p>AG-6 Comment noted. This comment does not suggest an inadequacy in the analysis of the PEIR, but will be provided to decision makers for their consideration.</p> <p>AG-7 Comment noted. This comment does not suggest an inadequacy in the analysis of the PEIR.</p> <p>AG-8 This comment does not suggest an inadequacy in the analysis of the PEIR, but will be provided to decision makers for their consideration.</p> <p>AG-9 The Specific Plan does not propose specific development projects. The height limit allowances within the Specific Plan area will ultimately be decided by City Council.</p> <p>AG-10 This comment does not suggest an inadequacy in the analysis of the PEIR, but will be provided to decision makers for their consideration.</p> <p>AG-11 Comment noted. This comment does not suggest an inadequacy in the analysis of the PEIR.</p>
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LETTER

RESPONSE

AG-12

SUMMARY:

In weighing the pro's and con's and in consideration of my fears, I reject the Morena Corridor Specific Plan PEIR because of the proposed changes to zoning height limits, the 6 times increase in density, and the ensuing traffic and parking problems. My property values will be devalued, enjoyment of my property will be restricted—along with my view and my neighbor's views—and my community will be decimated by the increase in density, traffic and parking. I will continue to use my voice, my pen and my vote to reject the PEIR regarding the Morena Corridor Specific Plan, Project No.: 582608 / SCH No. 2016101021 and all who support this travesty!

Sincerely yours,



Constance A. Biewer

AG-12 This comment will be provided to decision makers for their consideration.

LETTER

RESPONSE

From: Grant Kuhn
To: [PLN PlanningCEQA](#)
Subject: Morena Corridor Project # 582608 / SCH # 2016101021
Date: Monday, September 24, 2018 4:11:34 PM

Letter AH

AH-1

I'm writing this email to protest the Corridor Specific Plan's provision for allowing structures to exceed the current 30' rule.

Grant Kuhn
2024 Frankfort St
Bay Park homeowner

AH-1 Comment noted. This comment does not suggest an inadequacy in the analysis of the PEIR.

LETTER

RESPONSE

From: Janette Faust
To: [PLN PlanningCEQA](#)
Cc: [CouncilMember Lorie Zapf](#); [Councilmember Barbara Bry](#); [Councilmember Christopher Ward](#); [Councilmember Myrtle Cole](#); [Councilmember Mark Kersey](#); [CouncilMember Chris Cate](#); [Councilmember Scott Sherman](#); [davidalvarez@sandiego.gov](#); [Councilmember Geomette Gomez](#); [Faulconer, Mayor Kevin](#); [overlookheights@gmail.com](#)
Subject: Morena Corridor Specific Plan No. 582608 / SCH No. 2016101021
Date: Tuesday, September 25, 2018 3:10:55 PM

Letter AI

September 24, 2018

To Rebecca Malone, Environmental Planner, City of San Diego Planning Department
 9485 Aero Drive, MS 413, San Diego, CA 92123

Regarding: Morena Corridor Specific Plan, 582608/SCH No. 2016101021

- AI-1 1. Plans to build over 2000 units at Jeromes/Toys R Us properties with less than one parking space required per unit is too much density and too little parking for this neighborhood area. You should reduce the density of units and increase the amount of parking spaces for residents and businesses.
- AI-2 2. The city assumes these 2000 unit residents will regularly use the trolley instead of their vehicles. The continued use of automobiles needs to be accommodated. The Morena Corridor Specific Plan needs a ridership trolley study before supporting this extreme densification.
- AI-3 3. This Morena Corridor Specific Plan allows the developer to buyout of providing low cost housing. This buyout does nothing for providing a substantial amount of required affordable housing for low income and middle income families.
- AI-4 4. Who will finance the proposed infrastructure and community improvements? There should be cost estimates for each of the proposed improvements: community library, roads, parks and other public facilities. If the Jeromes/Toys R Us area is developed without any other changes to the Morena area traffic infrastructure, then traffic congestion will increase.
- AI-5 5. It is the duty of San Diego Mayor and City Council members to act upon the current Morena Blvd. property owner's concerns and suggested compromises in order to achieve a truly collaborative Morena Corridor Community Plan.

Resident of Overlook Heights

Janette Faust
 1520 Monitor Road
 San Diego, CA 92110
janettefaust@hotmail.com

- AI-1 Comment noted. This comment does not suggest an inadequacy in the analysis of the PEIR.
- AI-2 The City recognizes that it cannot be guaranteed that future residents will take advantage of transit; however, planning for high-density residential development near high-quality transit is a focus of the City General Plan City of Villages Strategy, the City's Climate Action Plan, and is consistent with SANDAG strategies identified in the Regional Plan. Refer also to response AI-1.
- AI-3 Regarding affordable housing, future development will be required to be consistent with City requirements related to affordable housing including the provision of adequate affordable housing and/or payment of in lieu fees. The Specific Plan does not specifically allow payment of fees instead of development of low-income units; rather, the City municipal code sets those requirements.
- AI-4 As discussed in Section 3.3.9 of the PEIR, a number of public facility updates have been identified in association with development of the Specific Plan. The project anticipates adoption of an Impact Fee Study (IFS; formerly known as a Public Facilities Financing Plan) for the Linda Vista community that addresses the need for public facilities associated with build-out of the Specific Plan. The updated IFS for Linda Vista would incorporate identified facility improvements within the Linda Vista portion of the Specific Plan area, based on facility analysis completed as part of the Specific Plan. The IFS would include potential funding sources for public facilities financing, particularly development impact fees. Future improvements to be identified in the IFS would vary widely in the PEIR range and scope; some could be implemented incrementally as scheduled street maintenance occurs, and others would require significant capital funding from city, state, regional, and federal agencies, or are not feasible until significant new development occurs. Adoption of an IFS for the Clairemont Mesa portion of the Specific Plan area would occur concurrent with the comprehensive update to the Clairemont Mesa Community Plan, and was, therefore, not considered as part of the Specific Plan project.

LETTER

RESPONSE

	<p>AI-5 The commenter's opposition to the project is noted.</p>
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LETTER

RESPONSE

Letter AJ

From: llebmit@aol.com
To: [PLN_PlanningCEQA](#)
Subject: Morena Corridor Specific Plan
Date: Wednesday, September 26, 2018 12:46:51 PM

PROJECT NAME: Morena Corridor Specific Plan
PROJECT No.: 582608 / SCH No. 2016101021

AJ-1

As Bay Park residents (44years), We're totally against the city breaking the 30 ft zone limit.

Tim Bell and wife Linda Krueger
1-619-276-8011

AJ-1

Comment noted. This comment does not suggest an inadequacy in the analysis of the PEIR.

LETTER

RESPONSE

Letter AK

From: Douglas Wetzel
To: [PLN PlanningCFOA](#)
Cc: [CouncilMember Lorie Zapf](#); [Councilmember Barbara Riv](#); [Councilmember Christopher Ward](#); [Councilmember Myrtle Cole](#); [Councilmember Mark Kersey](#); [CouncilMember Chris Cate](#); [Councilmember Scott Sherman](#); [Councilmember Georgette Gomez](#); [CouncilMember David Alvarez](#); [Faulconer, Mayor Kevin](#); [overlookheights@gmail.com](#); [howard.wayne@roadrunner.com](#)
Subject: Morena Corridor Specific Plan No. 582608 / SCH No. 2016101021
Date: Wednesday, September 26, 2018 6:44:56 PM

September 26, 2018

To Rebecca Malone, Environmental Planner, City of San Diego Planning Department
 9485 Aero Drive, MS 413, San Diego, CA 92123
 Regarding: Morena Corridor Specific Plan, 582608/SCH No. 2016101021

- AK-1 I am a 30+ year resident of Overlook Heights. I have reviewed the subject plan and have the impression that not a lot has changed as a result of the community input previously provided to Michael Prinz in August 2017. The most important changes that I see are needed to the current plan are as follows:
- AK-2 1. Inadequate Parking. The Tecolote Village District (Jeromes/ToysRus site) density is inadequately supported by enough parking for residents, as well as for trolley riders. Futurist wishful thinking will not keep even trolley riders from needing automobiles for all those trips that cannot be accomplished by public/bike means. Less than one parking space per unit is unrealistic.
- AK-3 Additionally, the trolley parking will be impacted from the parking needs of residents without enough spaces. What may appear to you as providing excess capacity now has a way of easily being filled out in the future (e.g., look at crowded parking at the Old Town Station now!). Further, let me remind you of a similar lack of foresight that caused an uproar back in 2014 concerning insufficient resident parking in the Spectrum/Centrum development that occupies the former General Dynamics land. Do the right thing for this Morena project and provide excess parking for both the trolley station and the residents of Tecolote Village. The lack of realistic ridership studies on this topic just indicates to me that trendy belief systems are instead guiding this development. Fewer new residents would also lessen the problem.
- AK-4 2. Traffic Flow. Two traffic congestion sites seem obvious.
- (2A) Do Not Close North Napa St. The closure of north Napa St. will likely cause congestion, particularly for those seeking to take a frequent route to Friars Rd. on south Napa. The plan provides two new longer alternative dog-leg routes to Friars Rd., (1) one is a turn from Morena onto a very short section of Linda Vista Rd. (often backed up now) & then right to Napa to Friars, (2) the other is from Morena via a proposed extension of Cushman/Morena Place to Linda Vista Rd, then right to Napa and left to Friars. Both of these dog-leg routes can be plagued by backed up traffic caused by a short approach to the intersection of Napa St. south at Linda Vista Rd. (this intersection is site of Rose Donuts, Starbucks, 7/11 store, & US Bank). Although I am sure the symmetry of the new grid design appeals to planners, the fact remains that the straight-through route of Napa St. from Morena Blvd to Friars road should be preserved to avoid these traffic tie-ups with the added turns in either proposed route. Closing the north section of Napa St. causes more problems that it is worth, pedestrians can still use it and bikes will use the alternative bike routes provided in the plan.
- AK-5 (2B) Plan for Freeway 5 Access. The plan opens the flow of traffic from W. Morena to Knoxville St. to already clogged intersections. I recommend additional attention to major traffic choke points that should be seriously adjusted to handle the increased traffic to access the 5 Freeway at Morena Blvd/Tecolote Rd./SeaWorld Drive. Again, the increased number of residents at Tecolote Village will

AK-1 Introductory comment noted.

AK-2 Regarding parking, the Specific Plan does not propose to provide less than one car per residential unit. Parking requirements are dictated by the Municipal Code. There are also policies supporting the use of shared parking to efficiently meet parking needs in village areas.

AK 3 The City recognizes that it cannot be guaranteed that future residents will take advantage of transit; however, planning for high-density residential development near high-quality transit is a focus of the City General Plan City of Villages Strategy, the City's Climate Action Plan, and is consistent with SANDAG strategies identified in the Regional Plan.

AK 4 The closure of Napa Street was analyzed and impacts are disclosed within the Draft PEIR and supporting Transportation Impact Analysis (provided as Appendix B of the Draft PEIR). As shown in Table 6.2-2 and Table 6.2-3 of the Draft PEIR, the roadway segments and intersections in this area are forecast to operate at acceptable levels of service with the realignment. The comment does not raise any specific issues regarding the analysis provided in the Draft PEIR. The comment will be included as part of the Final PEIR for review and consideration by decision makers prior to the final determination regarding the proposed project.

AK 5 As shown in Table 5-2 of the Transportation Impact Analysis, no significant impacts were identified along the referenced segment as the adjacent intersections operate at an acceptable level of service and an arterial analysis for the same segment was also found to operate at acceptable levels of service.

LETTER

RESPONSE

<p>not all be riding the trolley no matter how hard we wish it. The traffic path from the Tecolote Village to SeaWorld Drive & Rte 5 is a maze of small streets that will likely swell with the traffic load of 1,700+ new housing units, and these streets themselves will need attention (this includes the very short lead-up distances between traffic lights over the bridge north on Morena to the new Armstrong Garden Center at Knoxville St. -- this bridge should at the least be widened). The plan does very little to address this choke point when accessing the 5 Freeway at Morena Blvd/Tecolote Rd. /SeaWorld Drive. This choke point is a difficult problem to solve, but it should be addressed now, even in a stage two plan for the future, rather than leaving it for eternal grumbling by motorists in the future.</p> <p>AK-6 3. Affordable Housing. Many have come to suspect that our city will bend to the desires of developers, e.g., on issues like inadequate parking. But in this case I cannot see why the city would not enforce a hefty percentage of lower cost housing, particular in this presumably more affordable less desirable location adjacent to the railroad.</p> <p>AK-7 4. Planning & Funding Asynchrony. Are we to assume this is just a plan for an indefinite future since no funding has really been identified. But if Tecolote Village is to be privately developed soon, then how will all those extra residents impact the existing area when a future plan for this adjacent area is unfunded and years away from being acted upon.</p> <p>AK-8 5. Recommend Further Revision of Morena Corridor Specific Plan. I recommend further work to revise the plan based on new community input.</p> <p>Resident of Overlook Heights</p> <p>C. Douglas Wetzel 1520 Monitor Road San Diego, CA 92110 douglaswetzel@hotmail.com</p>	<p>AK 6 Future development within the Specific Plan area would be required to demonstrate consistency with City regulations relating to the provision of adequate affordable housing and/or payment of in lieu fees.</p> <p>AK 7 The project includes adoption of an IFS for the Linda Vista community that addresses the need for public facilities associated with build-out of the Specific Plan. The updated IFS for Linda Vista would incorporate identified facility improvements within the Linda Vista portion of the Specific Plan area, based on facility analysis completed as part of the Specific Plan. The IFS would include potential funding sources for public facilities financing, particularly development impact fees. Future improvements to be identified in the IFS would vary widely in the PEIR range and scope; some could be implemented incrementally as scheduled street maintenance occurs, and others would require significant capital funding from city, state, regional, and federal agencies, or are not feasible until significant new development occurs. Adoption of an IFS for the Clairemont Mesa portion of the Specific Plan area would occur concurrent with the comprehensive update to the Clairemont Mesa Community Plan, and was therefore not considered as part of the Specific Plan project.</p> <p>AK 8 The commenter's opposition to the project is noted.</p>
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LETTER

RESPONSE

Letter AL

From: Derek Someda
To: [PLN PlanningCEQA](#)
Subject: Fw: Morena Corridor Specific Plan, project 5826081 SCH 2016101021
Date: Thursday, September 27, 2018 12:14:17 AM

On Wednesday, September 26, 2018 11:51 PM, Derek Someda <someda@sbcglobal.net> wrote:

AL-1

All openings should consider radius turns of tandems and mtn bikes w trailer
 1.Linda Vista Plan Fig 3-13 Sherman to W Morena needs an opening in barrier
 2.Figure 3-12 left turn w light? is there a manual way to activate light w cabon bike?
 3. Figure 3-9 lft turn Cushman to W Morena barrier is in the way.
 Cushman rt to W Morena sidewalk is in the way
 They need openings
 4. W Morena lft to Cushman staging area next to traffic on W Morena. Either green markings next to traffic or green circles in front of traffic as per North Park bike paths that are planned.
 5. Figure3-8 slim island so tandem can radius a turn.
 6.Fig 3-5 lft turn from Knoxville needs bike staging area.
 Thanks
 Derek Someda
 Bay Park

AL-1 All comments will be provided to decision makers for consideration. The comment does not identify inadequacies contained within the PEIR; thus, additional response is not warranted.


LETTER

RESPONSE

LETTER	RESPONSE
<div data-bbox="205 183 905 277"> <p>From: WALTER DEAL To: PLN_PlanningCEQA Cc: Prinz, Michael; Jim LaMatter Subject: PROJECT NAME: Morena Corridor Specific Plan,,PROJECT No.: 582608 / SCH No. 2016101021 Date: Thursday, September 27, 2018 10:09:30 AM</p> </div> <div data-bbox="840 162 1026 214" style="border: 1px solid black; padding: 2px; text-align: center;">Letter AM</div> <p>TO: PlanningCEQA@sandiego.gov</p> <p>PROJECT NAME: Morena Corridor Specific Plan PROJECT No.: 582608 / SCH No. 2016101021</p> <p>AM-1 Please regard this email as an update to my email of September 7, 2018. As you know, the City Planning Department intends to make substantive changes to the Morena Specific Plan (see Mr. Hansen's September 17 letter to Councilmember Zapf). I presume these significant changes will trigger a revision of the PEIR and reset the clock for public comments.</p> <p>It's obviously not reasonable (and may be illegal) to expect timely public comments on aspects of the PEIR that are clearly affected by last-minute (or even after-the-last-minute) changes to the Specific Plan.</p> <p>AM-2 The comments in this email are based on Mr. Hansen's statement, "The plan will include language supporting a pedestrian and bicycle bridge [emphasis added- that is, apparently one bridge, not two] between Mission Bay Park and the Specific Plan area over the I-5 freeway."</p> <p>AM-3 As I said previously, pedestrian and bicycle safety might not ordinarily be addressed in an EIR. However, the PEIR states that a goal of the Specific Plan is to "create a complete mobility system that promotes access and increases safety for pedestrians, bicycles, and transit." This statement indicates that safety is a factor that the PEIR did and should continue to address, even if inadequately.</p> <p>AM-4 For the last 4+ years, City planners and SANDAG have given short shrift to community concerns about dangers to pedestrians and bicyclists (and, now, rent-a-scooter riders) who will take the trolley to the Tecolote or Clairemont stations, and walk or bicycle over the I-5 overpasses to Mission Bay Park. Both of these overpasses are, in the view of many community members, dangerous for pedestrians and bicyclists. I personally know of one severe, life-changing bicycle-automobile accident on the Clairemont overpass. See my Comments (4 of 5) in my email of September 7 for more information.</p> <p>AM-5 Last week (!), Mr. Hansen said City planners will now include a pedestrian/bicycle overpass (one, not two??) in planning. I like to think my raising the possibility that SANDAG and City officials may face individual civil and criminal liability when the inevitable accident occurs had at least a little to do with their abrupt reversal, even though the reversal is likely to be too</p>	<p>AM-1 The PEIR analyzes the Final Morena Corridor Specific Plan. No additional analysis is required.</p> <p>AM-2 Comment noted. The policy is intended to support one bridge that could accommodate both pedestrian and bicycles. This comment does not suggest an inadequacy in the analysis of the PEIR.</p> <p>AM-3 Bicycle and pedestrian improvements are discussed in Section 6.2.3 of the PEIR. Specifically, the PEIR addresses whether the project would conflict with adopted policies, plans, or programs supporting alternative transportation. Mobility improvements identified in the Specific Plan are overall intended to increase safety for pedestrians and bicyclists by providing improved facilities. The PEIR evaluates these changes at a planning level as there are no site-specific, project-level mobility improvements proposed as part of the Specific Plan. At the time specific improvements are proposed, the safety of pedestrians, bicyclists, and motorists would be further evaluated. Thus, the evaluation related to safety in the PEIR is adequate.</p> <p>AM-4 The conditions referenced by the commenter are part of the existing condition associated with access to Mission Bay. The Specific Plan recognizes this deficiency in adequate access to Mission Bay for pedestrians and bicyclists and has incorporated policies supporting improved connections.</p> <p>AM-5 Refer to responses AM-3 and AM-4. This comment does not suggest an inadequacy in the analysis of the PEIR.</p>

LETTER

RESPONSE

<p>little, too late. Their stonewalling for 4+ years most likely means that the trolley will be operational well before there are safety upgrades for pedestrians and bicyclists – safety for pedestrians and bicyclists on these overpasses was not a priority in planning. I hope our fears and concerns are not realized. If they are realized, I hope the City official who instructed planners to disregard safety in planning gets fitted with an orange jumpsuit.</p> <p>AM-6 Even before bridge construction begins, I believe it is imperative that City and SANDAG planners consult with traffic safety experts to make the current overpasses meet up-to-date safety standards by the time the trolley becomes operational. This should have been done four years ago; it certainly should be done NOW. I don't know if the current overpasses can be reconfigured to meet up-to-date safety standards. The PEIR should address this issue, and issues that arise from the new inclusion of a pedestrian/bicyclist bridge in the Morena Specific Plan as well as the other changes discussed in Mr. Hansen's letter of September 17.</p> <p>AM-7 Feel free to contact me if I can provide any additional information.</p> <p>Walter J. Deal 2252 Frankfort Street San Diego, CA 92110 wjdeal@san.rtr.com</p> <hr/> <p> Virus-free. www.avast.com</p>	<p>AM-6 The Specific Plan provides a policy framework supporting identified mobility improvements within the Specific Plan area. As future mobility improvements are proposed, site-specific engineering-level studies would be completed that would consider safety for all users.</p> <p>AM-7 See response AM-1 and AM-6.</p>
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LETTER

RESPONSE

From: Janet Croft
To: [PLN_PlanningCEQA](#)
Subject: Morena Corridor Specific Plan project No. 582608 /SCH No. 2016101021
Date: Thursday, September 27, 2018 5:38:36 PM

Letter AN

AN-1

I reject the Morena Corridor Specific Plan because it disregards the input and wishes of the majority of the citizens of the neighborhoods directly affected. In my opinion it also does a great disservice to the entire city of San Diego. The city planners need to go back to the drawing board and keep the promises made to us. Protect and preserve the integrity and character of our neighborhoods.

Yours truly,

Janet Croft

AN-1

The comment does not suggest an inadequacy in the analysis of the PEIR; however, all comments will be forwarded to decision makers for consideration.

Letter AO

DEALY DEVELOPMENT, INC.

September 27, 2018

Rebecca Malone, Environmental Planner
 City of San Diego Planning Department
 9485 Aero Drive, MS 413
 San Diego, CA 92123

Re: Morena Corridor Specific Plan No. 582608/SCH No. 2016101021
 Comments on Program Environmental Impact Report (PEIR)

Dear Ms. Malone:



AO-1

Dealy Development, Inc. has been retained by the property owners in the Tecolote Village District TOD designated zone and the Morena Station District. Over the last 3+ years DDI has been attending community meetings, talking to Stakeholders in the LV community, meeting with City Planning Department, regional stakeholders, climate action plan groups, professional planning groups, technical traffic and development experts, urban planners and elected officials. We have conducted economic market studies for land value and development programs for conceptual development options for both of the two districts outlined in the PEIR.

The two TOD zones take advantage of the existing SD Trolley along with the current extension to UCSD and UTC. We have discussed the regions significant housing shortage including workforce and affordable.

Our concept plans for the Tecolote Village District included master planning for over a 16 acre gross site that would allow for the development of a mixed use residential master plan that would include neighborhood retail, restaurants, grocery store, drug store, outdoor cafés, dog park, pocket parks, open space and neighborhood amenities that currently are not in the Western part of Linda Vista. The ability to master plan a large parcel offers significant benefits that are not being considered by community groups. A fixed rail transit location with a mixed use development is ideal for walkable, bikeable and trolley mobility that has been successful in urban neighborhoods in Southern California locations.

AO-1 The comments in this letter do not suggest an inadequacy in the analysis of the PEIR; but will be forwarded to the decision maker for consideration.



The Morena Blvd. district currently has evolved over the years with the STRIP mentality of small parcels being developed with no community or neighborhood character. A large parcel and good urban design offers significant opportunities for including amenities and good urban design for the district while meeting the goals and objectives of City, Regional and State mandates for climate action, with density on transit.

It is imperative to understand that the Tecolote Station (TS) site is not on MORENA Blvd, it is on WEST MORENA. Nor is it immediately adjacent to residential zoning. It is buffered with the Train Tracks, Industrial (Storage) and I-5 to the West, Community Commercial (Artisan) to the East and Industrial (Employment) to the South.

Further that the site slopes down from East to West and becomes a deeper parcel of land at the southern portion of the TS zone. The TS site is perfectly located to be developed as up to 109 DU/Acre via a PDP that would require a Linda Vista review and vote before going to the City of San Diego Planning Department. Without meeting the regions and City of SD needs for housing it is predicted that the significant impact to the our core employment sectors including high tech and defense contractors will be forced out of the local economy with significant economic impacts to our economy.

The existing Tecolote property is set up as a big box retail, not neighborhood friendly and offers no community amenities. Over time the property will continue to become non compatible with Urban and neighborhood character and could become blighted with homeless, crime and other negative impacts to the community and residential neighborhoods further to the East.

Good urban planning allows for positive and compatible community solutions. Any project proposed for both the Tecolote and Morena Station that could achieve the higher density proposed in the PEIR would be subject to a PDP with reviews at the community planning group and City Planning Department. SANDAG, City of SD and State regulations are looking to the future of the City and these two TOD Districts outlined in the Morena Corridor Specific Plan allow for all the key planning objectives to be achieved.

To summarize:

1. City/County/SANDAG is in construction on a \$2 Billion trolley extension from Mission Valley to UTC and UCSD. This significant investment with a new station at the Tecolote Station District connects residents, tourists and workers to the City.
2. TOD's are the best available locations for higher density quality development in the greater San Diego region to help mitigate the significant shortage of workforce housing.
3. Proximity of USD to both Tecolote and Morena allow for adding shuttles at both stations mitigating the through traffic from I-5 and I-8 to the campus
4. Tecolote will allow for a Linda Vista Village West that would create a sense of community with parks, neighborhood retail, outdoor café's, dog parks, bicycle facilities, grocery, etc.
5. Both high density TOD Districts address climate action mitigation,
6. The TOD mixed use residential Districts also have opportunities for traffic calming, TDM programs including carpooling, van pooling, off peak programs, etc.



7. The Tecolote mixed use residential can step up the height from WEST MORENA (45 feet) to the West along the railroad and I-5 to the 100 feet creating both the ability to accommodate the density but also have open space for pocket parks, dog parks, walkable trails and opportunities for community events.
8. Linda Vista Community Planning Group will have design review and input to improve any development planning for both TOD Districts.
9. Scale, density, quality, and land uses that qualify for a TOD District give the Community, City and Region the opportunities to meet the next generation of a better San Diego.

The proposed development concepts for both the MORENA Stations District and TECOLOTE Station District has been carefully considered and planned and is reflective of numerous public feedback, growth and Urban Design experts, public agencies and professional organizations to date. Our concepts and vision are in compliance with density, height limits and land uses discussed and included in the draft community planning documents.

Ownership of the two TOD Station Districts in the Linda Vista community are long standing San Diegans who will continue to work to provide the City with their involvement in the community to make San Diego the best City it can be as we continue to grow.

Sincerely

Perry M. Dealy

President CEO

Dealy Development, Inc.

619-977-7757

pdealy@dealydev.com

LETTER

RESPONSE

Letter AP

September 28, 2018

City of San Diego Planning Department
Attn: Rebecca Malone, Senior Planner
1010 Second Avenue, Suite 1200, MS 413
San Diego, CA 92101

Re: Comments on PEIR for Morena Corridor Specific Plan
Project No: 582608/SCH No. 2016101021

Dear Ms. Malone:

The following are some areas of concerns that I believe should be more adequately addressed in the PEIR:

- AP-1 1. The PEIR states "This chapter provides a summary of the trip generation, roadway, intersection, and freeway operating conditions under the Preferred Plan, Mid-Density Alternative, and Base Year conditions." It fails to provide the results of the Adopted Plan and Low-Density Alternative. The Adopted Plan and Low-Density Alternative are reflected in Table 9-1, but no quantitative analysis is provided for decision makers to use for their decision. This is particularly relevant given the September 17, 2018 memo from Mike Hansen which states that the height in Linda Vista portion will be limited to 45'. This makes the traffic impacts of the low-density alternative more relevant.
- AP-2 2. Please clarify the basis of the assumptions for changes in land uses shown in Table 9-1 that are triggering the reduction of traffic. It appears that commercial is being reduced and replaced with residential. The underlying zoning in Clairemont is staying the same. Do the assumptions assume that retail will be reduced in Clairemont and converted to residential instead of simply maintaining the retail and adding residential that is allowed by the zoning? For example: there is a proposed reduction in fast food no Drive Thru from 6,540 in the Base Year and 6,554 in the adopted plan to 2,514 in the Precise Plan. Does the PEIR assume that the community's eating habits change to allow a 60% reduction in fast food spaces? Auto commercial, parts, repair and tire stores are being reduced. Is that because there are fewer cars being driven so fewer auto related businesses are needed? That is contradicted by the fact that Table 9-1 shows traffic increasing with the Preferred Precise Plan by over 22,000 ADTs when compared to the Base Year.
- AP-3 3. Table 9-3, and 9-4 fails to identify the traffic that would be generated by the existing community plan or the Low-Density Alternative. This doesn't provide decision makers with the information to see the increase in land use or traffic over the existing community plan because of the proposed changes. Interestingly, the significant impact @ Denver Street and Clairemont Drive doesn't exist in the Base Year. Would it exist in the Adopted Plan or the Low-Density Plan? The Existing Plan's impacts have been approved. Would the increased traffic delta between the Adopted Plan and the Low-Density Alternative create a new significant impact? In Appendix B Figures 6-1 and 8-2 shows for example that the Adopted Community Plan would actually have more traffic than the Mid-density Alternative on Denver between Ingulf and Clairemont Drive. Thus, the significant impact associated for this road segment with respect to the Mid-density Alternative has already been approved as acceptable by the City Council. The council needs to easily be able to see the new impacts over those that they have already approved.
- AP-4
- AP-5

2900 Fourth Avenue #204, San Diego, CA 92103 619.233.6450 619.233.6449 www.zaap.biz



AP-1 Trip generation comparisons are provided for the Low Density Alternative and the Adopted Community Plan to demonstrate the magnitude of trips generated by the respective scenarios and to enable those to be compared to the other scenarios. As stated in the Transportation Impact Analysis (provided as Appendix B of the Draft PEIR), "the Low-Density Alternative will generate fewer trips than the Preferred Plan and Mid-Density Alternative, therefore, it is assumed the Low-Density Alternative scenario would result in impacts equal to or less than those scenarios."

AP-2 The land uses shown in Table 9-1 of the Transportation Impact Analysis are based on allowable land uses within the planned land use categories in the respective scenarios. Many of the land use designations are intended to be flexible, permitting residential and/or commercial uses. The land use development assumptions prepared for the Morena Corridor Specific Plan provided a planning estimate for total housing units and non-residential floor area that could occur in the future based on the proposed land use designations. Within Clairemont, all parcels with Commercial land use designations would allow for mixed-use development with residential densities up to 29 dwelling units per acre. Parcels with commercial uses that have a FAR less than or equal to 0.34 are assumed to redevelop to the maximum allowed residential density of the land use designation, with ground floor commercial uses of 0.25 FAR.

AP-3 Trip generation comparisons are provided for the Low-Density Alternative and the Adopted Community Plan to demonstrate the magnitude of trips generated by the respective scenarios and to enable those to be compared to the other scenarios. As stated in the Transportation Impact Analysis, "the Low-Density Alternative will generate fewer trips than the Preferred Plan and Mid-Density Alternative; therefore, it is assumed the Low-Density Alternative scenario would result in impacts equal to or less than those scenarios." Additionally, the PEIR correctly evaluates impacts of the project against existing conditions, not compared to an adopted plan.

LETTER

RESPONSE

	<p>AP-4 As shown in Table 9-1 of the Transportation Impact Analysis, the Low-Density Alternative is projected to generate fewer trips than the Adopted Community Plan; therefore, it can be assumed that any impacts created by the Low-Density Alternative would be equal to or less than those identified in the Adopted Community Plan. The Draft PEIR identifies the impact to the Denver Street/Clairemont Drive intersection and finds the impact significant and unavoidable; therefore, impacts under the Low-Density Alternative would not be more severe than the impact identified for the project.</p> <p>AP-5 The Draft PEIR confirms this impact would still exist with the proposed land use changes.</p>
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LETTER

RESPONSE

- AP-6 4. In reviewing Figure 6-1 and 8-2, East Morena from West Morena to Linda Vista is LOS F even with the new road geometrics. Yet, the length of LOS F in the Mid-Density Plan stops at Cushman in the Adopted Plan. Does it make sense to change the geometrics if we are making the length of the road segment failure longer. The Low-Density Plan doesn't have a figure for us to compare.
- AP-7 5. What are the assumptions that reduces the traffic on Napa between Friars Road and Linda Vista in the Mid-Density Alternative to less than the Adopted Community Plan?
- AP-8 6. In Section 10 regarding Alternatives, the traffic for the Mid-Density Alternative is quantitatively analyzed in Tables 10-4 and 10-5. However, there are no equivalent tables quantitatively analyzing Low-Density Alternative.
- AP-9 7. Traffic mitigation measures should be feasible to implement if it is being used to avoid a significant unavoidable impact. There is not enough right of way at Clairemont and Denver on either the north or south side of the intersection to achieve the mitigation measures. Condemnation of private property will be required to implement this mitigation. If this condemnation is not acquired, how much of the Plan's increased intensity/ density can be added without creating a significant impact?
- AP-10 8. The purpose of the Specific Plan is to promote Transit Oriented Development (TOD) which theoretically will reduce traffic. Yet the result of this plan according to the PEIR is that the Preferred Plan would create significant unavoidable traffic impacts on the nearby freeway segments. Based on the PEIR, is the Preferred Plan achieving the desired benefit in traffic reduction.
- AP-11 9. Morena is part of the Transit Priority Area (TPA) which allows reduction in parking. Yet, the Transportation Development Services Department has stated during discretionary projects being processed this year that there is a no correlation between reduction in parking within the TPA and reduction in traffic generated in the TPA. This seems illogical. Does the Mobility element assume reduction in traffic because of the TPA? If so, how does the PEIR reconcile its assumptions with the fact that Development Services Department is not accepting any reduction in traffic. If there is no reduction in traffic because of a result of being in the TPA, then how does this plan meet the goals of the Climate Action Plan.
- AP-12 10. The mobility element provides traffic analysis tables generated because of the Medium Density. It provides only a qualitative analysis for the low-density alternative. These is inadequate information for decision makers. This is especially relevant based on the memo of September 17, 2018 by Planning Director Mike Hanson which states that the Planning Department is proposing to reduce the height in Linda Vista to 45'. This will reduce the density and intensity of development to more like a low-density alternative. It is imperative that this alternative be more fully analyzed on a quantitative basis.
- AP-13 11. The Precise Plan proposes a network of new roadways in Linda Vista. These roadways will require acquiring land from private properties which creates an unknown. As part of the Notice of Preparation (NOP), I requested that the traffic analysis examine how much intensity/density can be added based on phases of the development of the proposed new roadway system without creating a significant impact. For example: How much of Tecolote Station can be built before East Morena is extended to Linda Vista Road and the Cushman Street connection is added?
12. The PEIR needs to look at the impact of the new circulation system and timing of implementation on existing projects. For example: The triangular corner of Napa and Linda Vista: With the future closure of Napa, customers coming southbound on Morena will need to turn left at Linda Vista and then turn left at Napa. The result is that customers will drive all around the project to simply get into the retail center which will discourage clientele. This could be relieved if there is a way to access from the new Sherman Street extension, but this will require access through someone else's property.

- AP-6 Comment noted. The Transportation Impact Analysis found the intersections along the realigned Morena Boulevard are projected to operate at acceptable levels of service. As footnoted in Table 5-2 of the Transportation Impact Analysis, since intersections control the flow of traffic along the roadway segment, they are typically a better indicator of actual roadway operations than segment analyses; therefore, even though the roadway segment level of service is projected to operate at LOS F, the actual flow of the roadway is projected to operate at acceptable conditions.
- AP-7 As stated in Chapter 6 of the Transportation Impact Analysis, the Mid-Density Alternative assumes the Preferred Plan roadway network and mobility improvements identified in Chapter 5 of Transportation Impact Analysis, whereas the Adopted Community Plan only assumes those improvements identified in the Adopted Community Plans.
- AP-8 Trip generation comparisons are provided for the Low-Density Alternative and the Adopted Community Plan to demonstrate the magnitude of trips generated by the respective scenarios and to enable those to be compared to the other scenarios. As stated on page 81 of the Transportation Impact Analysis, "the Low-Density Alternative will generate fewer trips than the Preferred Plan and Mid-Density Alternative; therefore, it is assumed the Low-Density Alternative scenario would result in impacts equal to or less than those scenarios."
- AP-9 As noted in Section 6.2 of the PEIR, mitigation at this intersection was not included within the Specific Plan, resulting in the impact being significant and unavoidable. Therefore, no condemnation will be required. Since the analysis was conducted at a program level that does not include individual project phasing or development patterns, the density in which the impact(s) occur cannot be determined at a program level of analysis. This analysis will need to be conducted at a project level.

LETTER

RESPONSE

	<p>AP-10 The Specific Plan includes the TODEP to foster higher density development within transit oriented locations. The TODEP would be expected to increase trolley ridership and reduce reliance on individual automobiles making local trips. The PEIR does conclude that notwithstanding the TODEP, the project would result in significant and unavoidable impacts to freeway segment (Impact 6.2-8: I-5 NB and SB, between Grand Avenue/Garnet Avenue and Old Town Avenue and Impact 6.2-9: I-8 EB, between Morena Boulevard and Hotel Circle). A Statement of Overriding Considerations would be required by the City upon adoption of the Specific Plan to identify benefits of the project that are outweigh unavoidable project impacts.</p> <p>AP-11 The Mobility Element relies on SANDAG's Series 12 travel forecast model which accounts for the interrelation between land uses as well as access to alternative mobility options. Trips identified by the travel forecast model include person trips associated with transit, walking, biking, and vehicles. With regards to Development Services, trip reductions utilizing the MXD method as well as transit reductions are accepted by staff.</p> <p>AP-12 Refer to Response AP-8.</p> <p>AP-13 The Draft PEIR and supporting analyses were conducted at a programmatic-level that does not include individual project phasing as the individual projects and their timelines are unknown. These analyses will be conducted at the project level as individual projects are proposed.</p>
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LETTER

RESPONSE

AP-14

13. The PEIR needs to clarify that certain roadways such as the closure of the portion of Napa between Linda Vista and Morena cannot happen without the extension of Sherman Street. The extension of East Morena to Linda Vista can not happen without the connection at Cushman.

14. The PEIR analyzed a three-lane roadway along Morena in Clairemont. The memo from Planning Director Mike Hansen dated September 17, 2018 states that staff is supporting a four-lane alternative. Does this need additional analysis in the PEIR?

AP-15

15. Visual Impacts: The PEIR 10.3.2.e. states that the Low-Density Alternative will result in significant unavoidable impacts with a 45' height. Yet, the current height overlay in Linda Vista allows development such as at the Morena Station to go up to 45' high. I would contend that the height of the Morena Station is not creating a significant unavoidable visual impact. The PEIR should prepare site sections or simulations through the impacted area to determine the actual visual impact looking down from areas like Bay Park and Outlook.

These are some of the issues that I believe should be more adequately addressed in the PEIR for the Morena Specific Plan.

Respectfully,



John C. Ziebarth, AIA, LEED AP

Attachment: Mike Hansen's memo of September 17, 2018
Nov. 4, 2016 NOP comments from John Ziebarth

AP-14 The PEIR analyzes the Final Morena Corridor Specific Plan. No additional analysis is required.

AP-15 The alternative acknowledges that even in the existing condition (45 feet) visual impacts could be significant and unavoidable. The purpose of the alternative is to compare impacts to the proposed project. As shown in Table 10-1, while visual impacts would be significant and unavoidable, they would be less than the proposed project.



THE CITY OF SAN DIEGO

M E M O R A N D U M

Letter AP
Attachment 1

DATE: September 17, 2018

TO: Honorable Councilmember Lorie Zapf

FROM: Mike Hansen, Director, Planning Department ~~and~~

SUBJECT: Revisions to the Morena Corridor Specific Plan

AP-16

Thank you for your recommendations regarding the Morena Corridor Specific Plan. The Planning Department values and appreciates your input and that of residents of the communities you represent. We share your goal of improving the neighborhoods of Bay Park and Morena and welcome feedback on how the plan can best accomplish that.

Based on your request, the following changes will be made to the draft Morena Corridor Specific Plan. These changes will not affect the proposed land use designations, zones or densities.

1. The plan will include language supporting a pedestrian and bicycle bridge between Mission Bay Park and the Specific Plan area over the I-5 freeway.
2. The plan will be amended to retain four lanes in the segment of Morena Boulevard from Ingulf Street to Knoxville Street including two northbound lanes, two southbound lanes, and left-turn pockets at intersections.
3. The Transit-Oriented Development Enhancement Program within the plan will be amended to remove the ability to seek a maximum height of 100 feet in the Tecolote Village District and to remove the ability to seek a maximum height of 65 feet in the Morena Station District through a future Planned Development Permit process. The proposed "by-right" height limit of 45 feet will remain.

We look forward to working closely with you and members of the Clairemont and Linda Vista communities as we refine the Morena Corridor Specific Plan and present it to the City Council for consideration.

Mike Hansen
Director, Planning Department

cc: Honorable Mayor Kevin L. Faulconer
Kris Michell, Chief Operating Officer
Ron Villa, Interim Assistant Chief Operating Officer
David Graham, Deputy Chief Operating Officer Smart & Sustainable Communities
Jessica Lawrence, Director of Finance Policy & Council Affairs, Office of the Mayor

AP-16 The attachment provided is acknowledged.

Letter AP
Attachment 2

November 4, 2016

City of San Diego Planning Department
Attn: Rebecca Malone, Senior Planner
1010 Second Avenue, Suite 1200, MS 413
San Diego, CA 92101

Re: Comments on Scoping for Notice of Preparation of EIR for
Morena Specific Plan



AP-17

Dear Ms. Malone:

I strongly disagree with the concept of identifying the scope for the Notice of Preparation for the Morena Specific Plan before a draft document is available for review. The draft Specific Plan is not available for review. The following are some areas of concerns that I believe should be addressed in the EIR:

1. The 2008 General Plan sought to protect industrial land as an important economic driver in San Diego. Grantville Amendment reduced industrial lands by 557% from 1,393,500 sf to 250,000 sf. Encanto Community Plan converted industrial land to residential. What will be the cumulative impact on the City of San Diego by the continued conversion of industrial land to Urban Village or other zones in the Morena Specific Plan?
2. The Morena Specific Plan within the Linda Vista community proposes to redirect roadways through private property. The concepts appear to have merit, but how much increase density is supportable without the roadway modifications? How much increased density is supportable if only certain roadways are redirected? Should there be a phasing of increased density tied to certain roadway modifications?
3. Please identify what combination of roadway modifications must occur at the same time. For example: the extension of East Morena to Linda Vista Road is not contingent on the extension of Sherman. However it would seem that Sherman could not be extended if Napa between Morena Boulevard and Linda Vista Road is not closed. Similarly, it seems that Napa between Morena Boulevard and Linda Vista Road could not be closed until the modification of the intersection of Morena Boulevard and Linda Vista is completed.
4. At the scoping meeting, the new zone in Linda Vista might be an Urban Village with densities of 44 to 109 dwelling units per acre rather than a community village of 44 to 73.
 - a. From a Visual & Aesthetic perspective what is an appropriate village classification for Linda Vista? Urban vs Community Village?
 - b. What density is to be assumed for the environmental analysis? This is a large range. Please analyze the potential impacts specifically with respect to traffic and GHG. Even
 - c. What is the height limit is being proposed? One Mission at 845 Fort Stockton is 5 stories with 47 du/acre. Park Laurel is 14 stories with 70 du/acre. Atlas on 5th is 5-6 stories with 90 du/acre. Deca is 6 stories with 73 du/acre. Doma is 9 stories with 91 du/acre. What is the impact of bulk and scale?
5. Please identify and analyze the impact of the geological fault zone on the potential redevelopment of Morena Boulevard north of Ashton.

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AP-17 This comment is a copy of the comment provided by the commenter during the Notice of Preparation process. No response is required for this letter as it does not raise specific comments regarding the content of the PEIR.

1. For the section of Morena in Bay Park, please analyze 3 alternative roadway configurations: 1. Existing with two lanes both north and south; 2. two north bound lane and one south bound lane; and 3. one north bound and one southbound. The level of analysis for the alternatives may vary depending on the adequacy and appropriateness of the solution, but each should be addressed at least cursory. For example: if the one lane both north and southbound handles only 75% of the projected traffic volume, this should be identified so that the community understands why the alternative is rejected. A detailed analysis is not required.
2. Please analyze an alternative land use designation for two locations in Bay Park: 1. Coastal Trailer Villa at Frankfort and Morena as RM2-5 zone and 2. Morena Mobile Village at Knoxville and Morena as RM-2-5 zone. This will allow the community to understand the impacts of these two-alternative land uses in these locations which have been subject to community discussion and a certain level of support. The environmental information is very valuable to the community's understanding of the impacts of these alternatives.
3. Please analyze the alternative of maintaining current zoning commercial zoning which allows mix use development at a density of 29 du/ acre.

These are some of the issues that I believe should be addressed in the EIR for the Morena Specific Plan. Other issues might arise once a draft of the Specific Plan is available for review.

Respectfully,



John C. Ziebarth, AIA, LEED AP

Letter AQ

September 28, 2018

Rebecca Malone, Environmental Planner
City of San Diego Planning Department
9485 Aero Drive, MS 413
San Diego, CA 92123

Re: Morena Corridor Specific Plan, No. 582608/SCH No. 2016101021
Comments on Program Environmental Impact Report (PEIR)

Dear Ms. Malone:

AQ-1 The Community of Linda Vista, by and through the Linda Vista Planning Group, by a unanimous vote, adopted the following comments regarding the PEIR for the Morena Corridor Specific Plan (MCSP), as referenced above.

AQ-2 On September 17, 2018, during the comment preparation period the Planning Department, issued a memorandum stating that three changes “will be made to the draft Morena Corridor Specific Plan”: (1) language will be added supporting a pedestrian/bicycle bridge; (2) the plan will be amended to retain four lanes on Morena Boulevard from Ingulf Street to Knoxville Street; and (3) the Transit-Oriented Development Enhancement Program within the plan will be amended to remove the ability to seek a maximum height of 100 feet in the Tecolote Village District and 65 feet in the Morena District through Planned Development Permits, and the height limit by right will be 45 feet. (Memo, attached to these Comments as Exhibit 1.)

AQ-3 The Memo, however, states that these changes “will not affect the proposed land use designations, zones or densities.” (Emphasis added.) As the changes are only promised, no representation is made regarding the ability to seek building heights between 45 and 100 feet near the Tecolote Station, and 45 and 65 feet near the Morena Station, and the PEIR and its October 1, 2018 comment deadline still exist, these comments will address the MCSP and PEIR as currently presented.

1. PRELIMINARY STATEMENT

AQ-4 A. The MCSP and PEIR are fundamentally flawed, *ab initio*

1. *The MCSP imposes a preconceived idea of high density without regard for community concerns.*

The Summary to the PEIR states that “objectives were identified to outline the underlying purpose for the proposed project.” (PEIR, p. S-2.) The passive voice does not identify who identified the objectives, but the objectives are to:

“Create a focused long-range plan for the Linda Vista Community Plan area intended to promote high-density residential and employment opportunities . . . consistent with the City of Villages strategy and the Climate Action Plan (CAP)”

“Establish land uses that facilitate transit-oriented mixed use development”

AQ-1 Introductory comment noted.

AQ-2 This comment accurately reflects the language included in the September 17, 2018 memorandum issued by Mike Hansen, Planning Director, City of San Diego Planning Department.

AQ-3 A change to the Specific Plan has been proposed to remove the allowance for a potential increase in height with a Planned Development Permit within the Tecolote Village and Morena Station Districts. Ultimately, the decision to remove the allowance for increased height with a Planned Development Permit will be made by the City Council after recommendation by the Planning Commission.

AQ-4 As a City project, the City identified the PEIR project objectives; however, the PEIR project objectives generally align with the objectives of the Specific Plan, which were developed with community input. The project objectives reiterated in the comment are consistent with information presented in the PEIR.

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“[P]rovide critically needed [but not necessarily affordable] housing by designating high-density residential and mixed-use development within close proximity to the transit station.”

(PEIR, p. S-2, emphasis added) Those objectives were developed without community input.

AQ-5

The Linda Vista Community had the citizens’ objectives in mind. On February 16, 2016 the Ad Hoc Committee for the Morena Corridor Project unanimously adopted a “Vision Statement and Guiding Principles” that called for (1) retention of the current height limits; (2) no worsening of traffic; (3) density compatible with the existing neighborhoods; and (4) infrastructure and parks for any increases in density. (See, Comments of Howard Wayne, on file with the Planning Department and attached to these Comments as Exhibit 2, p. 1.) This summary, in the form of a Comments letter, was provided to the Planning Department in August 2017. The Comments letter was never addressed by the Planning Department, nor were the large number of community comments that were raised at July 2017 Ad Hoc Committee meeting and provided in writing to the Planning Department.

AQ-6

In contravention to this Vision Statement, the MCSP instead

(1) raises the height limit from its current 30 feet by right and 45 feet by discretion, to 45 feet by right and 100 feet by discretion near the Tecolote station, and to 45 feet by right and 65 feet by discretion near the Morena Station. (MCSP, pp. 83, 84);

(2) narrows Morena Boulevard southbound to one lane (MCSP, p. 37);

(3) increases density from its current 29 dwelling units to the acre to 109 units to the acre near the Tecolote station and to 73 units to the acre near the Morena station (MCSP, p. 84); and

(4) does not provide for the infrastructure the increased density would demand (MCSP, p. 77).¹

AQ-7

The PEIR attempts to rationalize the MCSP under the Climate Action Plan and the City of Villages. However, the true rationale is maximizing the land’s value for the benefit of the current land owners. In December 2016 Perry Dealey, the architect for Doug Manchester, working for the Navarro family that owns the Jerome’s property at the Tecolote site, at a meeting of the Ad Hoc Committee, submitted a draft project compelling similar to the MCSP, right down to high rise buildings and restrictions for off-street parking. The MCSP appears designed to fulfill the Navarro family project and to maximize the value of their land.

¹ The admission in the PEIR that from the beginning the “objectives were identified to outline the underlying purposed for the proposed project” to promote high-density residential construction validates what was only an assertion in the Wayne comments:

The Plan is so at odds with the community input as to strongly suggest that the Planning Department had a predetermined outcome and the “collaborate process” was so much “checking the box” of public participation. (Exhibit 2, p. 2.)

AQ-5

Comment noted. This comment does not suggest an inadequacy in the analysis of the PEIR.

AQ-6

Comment restates information from the Specific Plan; however, the Specific Plan does not state that it “does not provide for the infrastructure the increased density would demand” as indicated in item 4 of this comment. As future development proceeds consistent with the Specific Plan, appropriate infrastructure improvements would either be required to be installed concurrent with project development, if warranted, or development impact fees would be paid to ensure infrastructure needs are funded commensurate with the demand generated by development.

AQ-7

The PEIR objectively analyzes project impacts. See PEIR subsections 6.1 and 6.8 for a discussion of the project’s potential impacts associated with land use and GHG, respectively. The remainder of this comment is noted as it does not suggest an inadequacy in the analysis of the PEIR.

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<p>AQ-8 2. <i>The MCSP and the PEIR are not supported by a ridership study.</i></p> <p>The Transit-Oriented Development Enhancement (TODE) program is used by the MCSP as the basis for the extreme densification in the vicinity of the two trolley stations. (MCSP, p. 84.) Unstated is the MCSP's assumption that residents of the high-density area will regularly use the trolley instead of vehicles. Indeed, at the December 2016 Ad Hoc meeting, the Navarro development concept presented would allocate less than one parking space per dwelling unit.</p> <p>AQ-9 What is lacking, despite repeated requests made at Ad Hoc Committee meetings, is any study to show that residents of the TODE areas will rely on the trolley for basic transportation.² No ridership study is presented in the PEIR. If it is not shown that residents of high-density areas will regularly use the nearby trolley, then there is no justification to concentrate housing at the stations. Density could be anywhere.</p> <p>AQ-10 Two factors suggest the MCSP assumption is false. First, there is already densification along nearby Friar's Road where there is an existing trolley line. In this area of dense housing, the level of service of Friar's Road is deficient. It demonstrates that not only will extreme densification not reduce vehicle use, but instead that it will worsen traffic. A second factor is the 100 foot dwellings in the TODE area require steel frame construction, which is an expensive type of building. Instead of affordable housing the extreme densification with 100 foot buildings will create high rise, high cost housing. People who can afford high rents typically will own two or more cars per dwelling unit. High rise housing will worsen traffic and not contribute to the goals of the CAP.</p> <p>AQ-11 3. <i>The MCSP does nothing to alleviate the shortage of affordable housing.</i></p> <p>AQ-12 While the PEIR sanctimoniously invokes the need for housing, the MCSP does nothing for affordable housing. There is a plethora of housing for the elite, and some subsidies for low-income individuals, but the middle class is being forced out of the housing market. The trolley represents a billion-dollar investment of public funds and the public should have affordable housing to show for it.</p> <p>AQ-13 By way of example, a survey taken in 2017 showed that a one-bedroom apartment in the transit oriented housing development at Napa and Linda Road rents for about \$2,100 per month. Using the HUD standard that a family should not pay more than 30% of its income for housing, this requires an annual income of \$84,000, well above the San Diego median. Notably, that development is not even the high-rise, high-cost units called for in the MCSP</p> <p>AQ-14 As previously discussed, high-rise housing is high-cost housing that is unaffordable for most San Diegans. The MCSP does not provide for affordable housing, but instead allows developers to buy out of the already inadequate ten percent they are required to provide. Where there is such a large public investment as is going into the trolley, the affordability requirement</p> <p>² At the August 27, 2018 meeting of the Ad Hoc Committee, the request was met by the Planning Department's representative claim that those studies exist in national literature. Those studies were not produced, nor was there any assurance that San Diego-based ridership studies even exist.</p>	<p>AQ-8 The Specific Plan does not propose to provide less than one car per residential unit. Parking requirements are dictated by the Municipal Code. There are also policies supporting the use of shared parking to efficiently meet parking needs in village areas. Additionally, planning for high-density residential development near high-quality transit is a focus of the City General Plan City of Villages Strategy, the City's Climate Action Plan, and is consistent with SANDAG strategies identified in the Regional Plan.</p> <p>AQ-9 The City recognizes that it cannot be guaranteed that future residents will take advantage of transit; however, planning for high-density residential development near high-quality transit is a focus of the City General Plan City of Villages Strategy, the City's Climate Action Plan and is consistent with SANDAG strategies identified in the Regional Plan.</p> <p>AQ-10 Project traffic is discussed in Section 6.2 of the PEIR.</p> <p>AQ-11 The economic feasibility of future development to accommodate affordable units within proximity to transit is beyond the scope of the PEIR; however, all future projects within the Specific Plan area will be required to be consistent with City regulations relating to the provision of adequate affordable housing and/or payment of in lieu fees. With respect to traffic and GHG impacts, see PEIR Sections 6.2 and 6.8, respectively.</p> <p>AQ-12 The Specific Plan identifies areas where increases in residential densities would be allowed near existing and planned trolley stations, but does not propose any specific development project or affordable housing development. Future development proposals will originate from private developers. The Specific Plan is intended to provide development at intensities that would allow for a range of housing affordability levels to be accommodated. This comment does not suggest an inadequacy in the analysis of the PEIR.</p> <p>AQ-13 See response to comment AQ-12.</p> <p>AQ-14 See response to comment AQ-12.</p>
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	<p>should be raised to at least forty percent, and policies should be established to prevent developers from buying it out.</p> <p>4. <i>The MCSP does not provide for needed infrastructure.</i></p>		
AQ-15	<p>It is a fiction that in-fill development can be done on the cheap without paying for the improved infrastructure needs that it creates. San Diego has already paid for this fallacy. In-fill was attempted in the 1960s and 1970s when single family units in North Park and Normal Heights were demolished to make room for multi-family housing, but water capacity was not increased. In 1985 a fire started in Mission Valley and raced up the canyon wall. Firefighters responded to the inferno, but found water pressure was lacking for their hoses because of the increased number of dwelling using the same water pipes that were designed for single family homes. A significant part of Normal Heights burned.</p>	AQ-15	<p>The PEIR includes discussions of utilities and services required to support the proposed project. Specifically, a WSA was prepared to address build-out of the Linda Vista Community Plan area, including proposed land use changes within the Linda Vista portion of the Specific Plan area (see Appendix F of the PEIR). The WSA determined that there is sufficient water planned to supply the estimated annual average usage. For a detailed discussion of water supply impacts, see Section 6.14.3 of the PEIR. Additionally, as discussed in Section 6.13.3 of the PEIR, as development occurs, each project will be evaluated by emergency service personnel and will be required to pay development impact fees. Fire suppression will be required through compliance with City fire safety policy and regulations regarding placement of fire hydrants and water lines, and the requirements for fire sprinkler systems. Payment of these fees would ensure impacts to fire/life safety protection are less than significant.</p>
AQ-16	<p>The MCSP acknowledges this need for increased water infrastructure, but does not resolve it. Instead, it says that “[i]mplementation of the Specific Plan <i>could</i> require upgrades to the existing water system infrastructure to ensure adequate capacity and sufficient fire flow. (MCSP, p. 77, emphasis added.) it does not show how the city would pay for the upgrades to the existing water system, nor does it impose a requirement that new development fund it.</p>		
AQ-17	<p>The PEIR does no better. On page 1 of the Project Description, it states that an update to the Impact Fee Study for the Linda Vista Community Plan is also proposed for adoption “<u>as a subsequent discretionary action.</u>” (Emphasis added.) No, the Impact Fee study must be conducted prior to approval of the MCSP or its variants to protect the public fiscally and physically.</p> <p>5. <i>The TOD program fails to provide adequate off-street parking.</i></p>	AQ-17	<p>See response to comment AQ-15.</p>
AQ-18	<p>What appears inherent in the TOD program is a strategy to lessen traffic by substantially reducing off-street parking requirements. In turn, this assumes, again without a study, that residents of TOD projects will rely on the trolley for basic transportation, and this will be coerced by denying them adequate parking. What is more likely is that second vehicles will be parked on the streets, particularly the streets of nearby communities such as Overlook Heights.</p>	AQ-18	<p>Page 3-1 of the PEIR identifies adoption of an Impact Fee Study for the Linda Vista community planning area as a discretionary action that would be implemented as part of the proposed project, not as a subsequent discretionary action.</p>
AQ-19	<p>Multi-family units in North Park typically limit off-street parking to about one space per unit. The result is great difficulty in finding parking there. Residents park their other vehicles on the streets. Visitors have nowhere to park. Given that the high-rise/high cost housing the MCSP fosters would attract more affluent individuals, the likelihood of multiple vehicle ownership is high. As a Planning Department spokesperson at the August 27, 2018 Ad Hoc Committee meeting said, the project cannot restrict the ownership of vehicles by tenants.</p>	AQ-19	<p>See response to comment AQ-8.</p>
AQ-20	<p>One other concept advanced is disaggregating parking spaces from the price of rent, thus forcing tenants to pay separately for parking and thus deterring them from owning multiple vehicles, or even one car. First, of course, the Planning Department has not provided a study to support this conclusion. Second, in a complex that would attract affluent individuals, the lost opportunity costs of foregoing a vehicle would greatly exceed any reasonable disaggregated rental fee.</p>	AQ-20	<p>See response to comment AQ-8. Additionally, the City cannot restrict vehicle ownership but can limit the amount of parking provided as a disincentive for vehicle ownership.</p> <p>The comment refers to the concept of decoupling the cost of parking from rental costs, which is not discussed in the Specific Plan or PEIR. See responses to comments AQ-8 and AQ-9.</p>

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<p>AQ-21 6. <i>The City of Villages strategy is inapplicable to the Plan Area.</i></p> <p>As noted in the discussion of page S-2, the PEIR states the MCSP is designed to implement the City of Villages strategy. That is a concept of essentially creating pods where one can live, shop, and work and not need to actually leave the “village” to do any of these things. Such autonomy requires employment sites, markets, theaters, gyms, and so forth in the project area.</p> <p>AQ-22 However, neither transit station area offers more than a few types of jobs – primarily light industry in the Tecolote area. There is no space for a supermarket, let alone the types of services people want to utilize. The City of Villages strategy might work under other circumstances, but not here because the sites are too small.</p> <p>AQ-23 7. <i>The PEIR fails to account for cumulative impacts of nearby proposed development.</i></p> <p>While purporting to investigate the environmental impacts of the MCSP, the PEIR does not consider, or for that matter even acknowledge, the upcoming development of the River Walk project in Mission Valley. The cumulative impacts of the approximately 4000 units proposed in that area, along with the 7000 units in the MCSP, include traffic, water infrastructure, police, fire, library and park costs, GHG emissions, toxic air emissions and others. These cannot be ignored in analyzing the Morena Corridor area. The PEIR needs to be re-done to address the cumulative impacts if both projects are approved.</p> <p>AQ-24 8. <i>Enforceable requirements are lacking.</i></p> <p>The wording throughout the MCSP needs to be revised to be enforceable. By way of example:</p> <p>The MCSP encourages, but does not require, the installation of solar energy generation systems;</p> <p>The MCSP discourages, but does not prohibit, the use of turf in ornamental landscaping and strongly encourages, replacing ornamental turf with water-wise landscaping;</p> <p>The MCSP encourages, but does not require, the use of graywater reuse systems for landscaping irrigation.</p> <p>(MCSP, pp. 67-68.)</p> <p>The wording throughout the MCSP needs to be revised to be enforceable. Policies that state “support” should instead state “require,” “consider” should be “utilize,” “encourage” should be “prioritize” or “require.” These policies should be written to read as requirements, not as general suggestions.</p> <p>AQ-25 9. <i>The Planning Department must disclose the results of Tribal Authority Discussions.</i></p>	<p>AQ-21 The comment summarizes the concept of a village; no further response is required.</p> <p>AQ-22 The City recognizes that the planned village areas may not currently have a range of jobs, services, and retail opportunities; however, the purpose of the Specific Plan is to define allowable land uses that would allow the area to develop with a variety of housing options, jobs and shopping.</p> <p>AQ-23 The Riverwalk Project is outside the cumulative project area defined for the project. The cumulative setting for the Morena Corridor Specific Plan includes the Linda Vista and Clairemont Mesa community plans. The Riverwalk Project is within the Mission Valley community planning area.</p> <p>AQ-24 The Specific Plan contains policies and supplemental development regulations for development within the Specific Plan area and is intended as an overall guidance document for development within the Specific Plan. Future discretionary projects will be required to demonstrate consistency with the overall goals and policies of the Specific Plan; however, specific policies are written with flexibility in consideration of the range of projects that could be developed under the Specific Plan.</p> <p>AQ-25 Tribal consultation occurred early in the Specific Plan process. The NAHC has indicated that sacred lands have not been identified within the Specific Plan area. Consultation with tribal entities and other interested parties was recommended and conducted in accordance with Senate Bill 18 and Assembly Bill 52 (see PEIR Section 6.5.4, Issue 2). The mitigation framework ensures that all future development projects with the potential to affect archaeological or tribal cultural resources are subject to site-specific review as detailed in mitigation measure HIST 6.5-2.</p>
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<p>The PEIR concludes that implementation of the PEIR could adversely impact a tribal cultural resource. (PEIR, p. 6.5-8.) It notes that Native American consultation early in the project review process is a portion of the mitigation framework. (<i>Ibid.</i>) Before the PEIR can be full evaluated it is necessary for the Planning Department to disclose whether such consultation has taken place and the results of such consultation.</p> <p>B. <u>The MCSP and PEIR Violate the Linda Vista Community Plan</u></p> <p>AQ-26 The Linda Vista Community Plan (LVCP), adopted in 1998 and currently in force, sets out the community's vision for Linda Vista. It provides, in pertinent part:</p> <p>"The Linda Vista community will experience <u>moderate growth</u> over the next twenty years. Increases in residential density will occur primarily in <u>the central area of the community</u>. This increase will occur through the redevelopment of existing parcels rather than through the development of raw land. New residential development will be accompanied by <u>adequate parking</u> and landscaping, and by <u>commensurate improvements</u> in the community library, parks, roads and other public facilities." (LVCP, p. 11, emphasis added.)</p> <p>AQ-27 Instead of the moderate growth of the LVCP, the MCSP includes high density growth. Instead of residential density in the central area of Linda, the MCSP places it at the extreme western end of the community. The MCSP fails to provide any assurances that financing will be provided for the community library, parks, roads or other public facilities, and the PEIR denigrates their need.</p> <p>AQ-28 Instead of allowing for adequate parking, the MCSP violates this promise by incorporating highly restricted parking under its Transit Oriented Development Enhancement (TODE) provisions.</p> <p>AQ-29</p> <p>AQ-30 The LVCP further promises "[s]cenic resources, such as the slopes above Mission Valley, views to and from the University of San Diego, and <u>views from the public streets to Mission Bay will be maintained</u>." (LVCP, p. 11, emphasis added.) The MCSP violates this promise by imposing heights that would impede views from the public streets to Mission Bay. This could be remedied by substantially reducing the building heights proposed by the plan.</p> <p>II. <u>CHAPTER 2. ENVIRONMENTAL SETTING</u></p> <p>A. <u>Historical and Tribal Cultural Resources, PEIR Section 2.3.5</u></p> <p>AQ-31 Morena Boulevard has recently been recognized by the City of San Diego as part of the route of Historic Highway 101, but there is no mention of this in the PEIR. Any construction and road realignment will have an impact on this historical feature of the Linda Vista community. There is nothing in the MCSP to address this potential loss of a significant cultural resource.</p> <p>B. <u>Visual Resources and Scenic Vistas/Corridors</u></p> <p>AQ-32 The PEIR acknowledges that visual assets in the plan area includes its proximity to Mission Bay and other sites, but states that the public views towards these scenic resources are currently blocked by building. (PEIR, p. 2-27.) Public areas are those defined as open to all</p>	<p>AQ-26 The comment reiterates language from the Linda Vista Community Plan is noted. No further response to this comment is required.</p> <p>AQ-27 The project's consistency with the Linda Vista Community Plan is analyzed in Section 6.1.3 (Issue 1). The placement of higher density residential uses within the proposed TODEP areas is consistent with the City of Villages strategy that requires higher density development to be placed in proximity to existing and planned facilities. Specifically, as discussed in the Specific Plan Chapter 6, the Morena Corridor is well-positioned to reduce dependence on the private automobile due to the community's central location in the region, walkable size, and access to transit services. This allows the project to be consistent with and further the City's General Plan.</p> <p>AQ-28 A discussion of impacts related to public services (police protection, fire protection, schools, libraries, and parks and recreation) are assessed in Chapter 6.13 of the PEIR. The analysis is adequate for a program-level evaluation as there are mechanisms in place for future development to fund necessary services through construction of improvements and/or Development Impact Fees.</p> <p>AQ-29 See response to comment AQ-8.</p> <p>AQ-30 The Specific Plan includes a policy to preserve views to Mission Bay and as future projects are developed, protection of public view corridors would be considered in site design.</p> <p>AQ-31 The mitigation framework ensures that all future development projects with the potential to affect historic resources would undergo site-specific review as detailed in HIST 6.5-1. The Specific Plan does not include realignment of Morena Boulevard. Mobility improvements identified for Morena Boulevard would not affect the historic significance of the road as it is already a modern road.</p> <p>AQ-32 For a discussion of impacts to scenic vistas and views, see Section 6.7.3 of the PEIR. As stated therein, increased height limits would result in significant impacts to scenic vistas and views.</p>
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persons, maintained at the public expense and under public control. That would include roads and public rights of way. Any reasonable person traveling through the plan area can appreciate the views offered from the roads and public rights of way and notice that most, such as views of Mission Bay, are not blocked.

C. Greenhouse Gas Emissions

AQ-33 The PEIR catalogs the Greenhouse Gas Emissions (GHG) inventories of CARB and the City of San Diego. (PEIR, pp. 2-28 – 2-29.) In the Summary of Significant Environmental Impacts, Transport and Circulation, the PEIR acknowledges that implementation of the MCSP would increase GHG emissions over the existing land use. (PEIR, p. S-20.) It attempts to rationalize these GHG increases as a direct result of the implementation of the CAP Strategies, claims it would be less than significant and further asserts that that no mitigation is required. It then apparently claims the MCSP would ameliorate GHG emissions through transit-supportive development. (*Ibid.*)

AQ-34 The PEIR is inadequate because it fails to address the increase in GHG emission resulting from the greater number of vehicles that the increased density will bring. In addition, with the proposed reduction in lanes on Morena Boulevard, there will be more idling of traffic and increases of GHG emissions. Even without the increased density, gridlock on Morena Boulevard is present during morning and evening rush hours due to the temporary closing of a southbound lane for trolley construction. We do not believe the increase in GHG emissions is less than significant, and further believe that it can be mitigated by providing for lesser density than set forth in the MCSP.

AQ-35 Finally, the entire premise of the claim of transit-supportive development would be the panacea is not supported by any ridership study. True mitigation of GHG can be accomplished by lesser density than promoted by the MCSP.

D. Wildfire Hazards

AQ-36 The danger of Wildfire Hazards is summarily addressed in paragraph-long Section 2.3.10.2 of the PEIR. It acknowledges that the plan area contains approximately six acres on the Very High Fire Hazard Severity Zone located at the southernmost boundary of the plan area adjacent to Friars's Road, but ignores that this same condition exists just south of Tecolote Road in the Overlook Heights community. (PEIR, Figure 2-8 at p. 2-34.)³ The PEIR dismisses the risk of Wildfire Hazards imposed by the MCSP at "Less than Significant." (PEIR, p. S-22.)

AQ-37 The PEIR is deficient because it fails to even discuss the impact of density on the roads necessary to evacuate Overlook Heights in the event of a Wildfire. Overlook Heights is a cul-de-sac community, surround by canyons and the University of San Diego on three sides. The only vehicular exit is via Morena Boulevard. The added density imposed by the MCSP impairs the vital need to evacuate an area that the California Department of Forestry and Fire describes Very

³ The PEIR acknowledge that areas of steep slopes, limited precipitation and plenty of available vegetative fuel present potential wildfire risks. (PEIR, p. 2-33.) That exactly describes the canyon area on the south side of Tecolote Road adjacent to Overlook Heights.

AQ-33 This comment summarizes the information included in the Greenhouse Gas Emissions analysis section of the PEIR. No further response is required.

AQ-34 While providing less density within the plan area may reduce vehicle emissions, it would not be consistent with CAP goals of focusing density near transit. The significance of the project impacts related to GHG emissions are evaluated based on consistency with the General Plan City of Villages Strategy and Climate Action Plan. The purpose of increasing density near transit is to affect an increase in transit use and a decrease in single occupancy vehicles over time.

AQ-35 See response to comment AQ-9.

AQ-36 PEIR Section 6.10 addresses the potential impacts associated with wildfire. This section identifies areas mapped as a Very High Fire Hazard Severity Zone (VHFHSZ) by the California Department of Forestry and Fire (see PEIR Figure 2-8). The area referenced in this comment is located outside the boundaries of the Specific Plan area. To ensure fire safety throughout the Specific Plan area, future projects would be required to adhere to state and city regulatory requirements related to fire hazards and prevention, as well as specific fire prevention measures detailed in the Specific Plan. The PEIR concludes that through regulatory compliance impacts due to wildland fires would be less than significant. No change to the PEIR would be required.

AQ-37 Whether the project would impair implementation of, or physically interfere with, an adopted emergency response plan or emergency evacuation plan is discussed in PEIR Section 6.10 (Issue 3). As stated therein, the land uses identified in the Specific Plan would not physically interfere with adopted emergency plans. The mobility and transportation modifications discussed in Section 6.2, Transportation and Circulation, would directly help traffic flow and evacuation time. Moreover, the City and the Office of Emergency Services of San Diego County continue to coordinate to update emergency response plans to ensure resident safety in the case of wildfire.

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High Fire Hazard Severity Zone and the 2018 fire season in California that shows the capacity of wildfires to jump from wildlands into residential areas.

E. Seismic Faults

AQ-38 Figure 2-14 shows there are at least three major earthquake faults running under the Morena area. At least half the area, including the Jerome's site, would feature development in Geologic Hazard Category 31, "Liquefaction, High Potential-shallow groundwater, major drainage, hydraulic fills."

AQ-39 Instead of addressing these potential disasters, the PEIR concludes they are "Less than Significant" because new construction would be required to identify and address these hazards. (PEIR, pp. S-24 -25. The PEIR is inadequate because these challenges need to be addressed in the MCSP and the PEIR. Additionally, the Planning Department needs to provide the full fault zone studies.

F. Parks and Recreational Facilities

AQ-40 The PEIR acknowledges that the General Plan recommends a population based park of 2.8 acres for every 1,000 residents. (PEIR, p. 2-50.) The MCSP does not provide for parks to meet that requirement, and the PEIR is complicit by instead relying on existing parks. (PEIR, p. 2-51.) The PEIR does not address the demand for parks imposed by future population, where these parks would be built, when they would be built, or how they would be funded. It is simply inadequate.

G. Water Supply

AQ-41 The MCSP would increase the density of the plan area and the need to provide water. However, the PEIR simply states that the water lines that serve the area are "primarily cast iron, asbestos cement and polyvinyl chloride (PVC) . . . [and the PUD] "will upgrade/replace some of the older and undersized water lines in the Specific Plan area." (PEIR, p. 2-60.) Adding 6,000 dwelling units and not addressing the increased demand on water lines is chillingly reminiscent of the Normal Heights fire, and poses the question, "when will they ever learn?"

AQ-42 The PEIR is inadequate because it fails to state how these upgrades will be financed and how they would be phased in relation to construction in the Specific Plan area. The MCSP should be redone to address these concerns.

H. Wastewater

AQ-43 The PEIR describes the existing sewer system serving the plan area, but does not discuss the impact that a sharp increase in the area's population will have on those sewers. Instead, it states the "major trunk sewers have been studied to properly convey sewer flows from the proposed development." (PEIR, p. 2-62.)

AQ-44 The PEIR is inadequate because it fails to disclose the results of those studies, whether the existing sewer system is capable of dealing with the increased densities, and if not, how it is proposed to pay for replacement sewers. It mentions a new sewer pump station in the area as

AQ-38 This comment identifies the location of local earthquake faults and does not suggest an inadequacy in the analysis of the PEIR. For a discussion of impacts associated with geologic hazards, see Section 6.12.3 of the PEIR.

AQ-39 As a program level document, the PEIR does not propose any specific development projects, and thus cannot provide mitigation for potential geologic hazard impacts associated with a particular development project. As discussed in the PEIR, future development occurring within the Specific Plan area would be required to prepare site-specific geologic investigations to identify potential geologic hazards that might pose obstacles to construction of site-specific development projects. Geologic hazards or concerns would need to be addressed during grading and/or construction of a specific development project. Adherence to the San Diego Municipal Code grading regulations and construction requirements and implementation of the recommendations and standards of the City's geotechnical study requirements would preclude significant impacts related to geologic hazards. A copy of the Geotechnical Report prepared for the Specific Plan area is included as Appendix E of the PEIR.

AQ-40 The project's impacts related to parks and recreation is addressed in PEIR Section 6.13.3(b). As detailed therein, the City's General Plan allows park equivalencies to be used when vacant land is limited, unavailable, or is cost-prohibitive. While the Specific Plan would not meet the City's standard for population-based parks, it includes policies that would support additional parks within the Specific Plan area. Additionally, as population growth occurs and the need for new facilities are identified and/or the construction of the Tecolote Linear Park proceeds, future park development would be subject to a separate environmental review at the time design plans are available. Thus, implementation of the proposed project would result in a less than significant impact associated with the construction of new facilities in order to maintain performance objectives for parks and recreation facilities.

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	<p>AQ-41 A Water Supply Assessment was prepared for the Linda Vista portion of the Morena Corridor Specific Plan (the only area where density increases are proposed), which determined there was sufficient water planned to supply the estimated annual average usage associated with build-out of the Specific Plan. Furthermore, the PEIR for the Specific Plan analyzed potential impacts related to water supply (Section 6.14) and concluded that impacts would be less than significant.</p> <p>AQ-42 As discussed in Section 6.14 of the PEIR, upgrades to water lines are an ongoing process administered by the Public Works Department and are handled on a project-by-project basis. Because future development within the Specific Plan area would likely increase demand, there may be a need to increase sizing of existing pipelines and mains for water. As future development is proposed, the necessary infrastructure improvements to water infrastructure would be incorporated as part of standard practice for new development to maintain or improve the existing system to ensure adequate capacity. Additionally, future discretionary projects would be required to undergo project-specific review under CEQA, which would ensure that impacts associated with the installation of sewer and water infrastructure would be avoided.</p> <p>AQ-43 As discussed in Section 6.14 of the PEIR, upgrades to sewer and water lines are an ongoing process administered by the Public Works Department and are handled on a project-by-project basis. Because future development within the Specific Plan area would likely increase demand, there may be a need to increase sizing of existing pipelines and mains for both wastewater and water. As future development is proposed, the necessary infrastructure improvements to sewer and water infrastructure would be incorporated as part of standard practice for new development to maintain or improve the existing system to ensure adequate capacity. There is also a mechanism in place to require payment of infrastructure financing fees by both ministerial and discretionary projects to ensure infrastructure needs are funded commensurate</p>
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	<p>AQ-43 (cont.)</p> <p>with the demand generated by development. Additionally, future discretionary projects would be required to undergo project-specific review under CEQA, which would ensure that impacts associated with the installation of sewer and water infrastructure would be avoided.</p> <p>AQ-44 A water, sewer, and storm drain assessment was prepared for the project, and is included as Appendices F and G to the PEIR. The results of these studies are discussed in Section 6.14.3 of the PEIR. The analyses showed that with build-out of the Specific Plan, the existing peak sewer wet weather flow would increase by 0.30 cubic feet per second and 0.34 cubic feet per second within the Tecolote Village District and Morena Station District, respectively. The effect of a 0.30 cubic feet per second increase from the Tecolote Village District and a small portion from Morena Station District would occur within an existing 72-inch-diameter reinforced concrete pipe, raising the existing normal depth from 50.41 inches to a maximum of 50.50 inches. This increase would be within the allowable design parameters of the 72-inch-diameter concrete pipe. The remaining flow increase from Morena Station would enter an existing 66-inch pipe. As determined in the analyses, given the minor increase in flow relative to the capacity of a 66-inch-diameter pipe, it is not anticipated that the increase would exceed the capacity of the pipe.</p> <p>In addition, in order to ensure that sufficient sewer capacity is available to serve future development, individual projects within the Specific Plan area may be required to perform a sewer study to ensure sufficient sewer capacity is available, and to identify necessary sewer infrastructure upgrades required for the individual project. Additionally, as future projects within the Specific Plan area are implemented, adherence to local and state regulations during construction would ensure physical impacts associated with construction of required infrastructure upgrades are reduced to less than significant.</p>
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part of the Pure Water program (PEIR p. 2-64), but does not state that it has any relationship to the demands imposed on the sewer system due to increased density. Indeed, it states there is no timeline or specified site for this phantom pump. (*Ibid.*)

III. TRAFFIC, SECTION 6.2

A. The Data Uses to Perform the Traffic Analysis Does Not Match Reality.

AQ-45 Table 5-1 in Appendix B of the PEIR, regarding trip generation, fails to disclose how the Preferred Plan and Base Year trip generation rates were derived. To be adequate, it would require information on how each of the land use trip rates were calculated. The trip generation rates are used as input data for traffic analysis. Several environmental impacts, such as air pollution and noise, depend on accurate results of the traffic analysis.

AQ-46 Appendix P, an e-mail from traffic analysis consultants Chen Ryan Associates to Claudia Brizuela, City Traffic Engineer, states that trip generation rates were provided by the City of San Diego to SANDAG.

AQ-47 The PEIR lacks transparency because the methods by which the trip generations rates were calculated are not provided in the document. What was provided does not inspire confidence. For example, Table 5-1, page 37 of Appendix B, states that multi-family high density total trips will increase over ten times (10X) with the preferred plan as compared to the existing conditions. This is indicative of the increase in the number of residents proposed by the plan, yet the number of fire and police stations trips remain unchanged between the preferred plan and the existing conditions. With about 6000 additional residential units to be added to the plan area, one would expect a concomitant number of fire and police stations trips.

AQ-48 Another obvious inaccuracy is demonstrated by the Nursery Total Trips. The existing conditions total trips for the Armstrong Garden Center was determined to be 905 trips, but with the preferred plan the total trips was said to be zero. As the nursery only relocated to the north side of Tecolote Road, within the transportation analysis zone, one would expect the preferred plan nursery trips to be at least 905 trips.

AQ-49 If one were to scale the fire and police station trips and the nursery trips by the proposed increased in multi-family high density trips (10X), there would be 10,160 fire and police stations trips, not 1,016, and 9,050 nursery trips instead of 905. Adjusting the total change in trips for with considering just the inaccuracies cited above discloses the following:

Increases in trips from base year to preferred plan	22,528
Additional Fire and Police station trips	9,144
Additional Nursery Trips	8,145
TOTAL ADDITIONAL TRIPS	39,817

This is a 77% increase in forecasted trips generated by the plan. There are 48 designated land use trip counts that need to be thoroughly reviewed in order to determine the true impact of the MCSP.

AQ-45 Trip generation rates are based on those provided in the City of San Diego's Trip Generation Manual (2003). The commenter is correct that traffic data is utilized to analyze other environmental issue areas such as air, noise, and GHG.

AQ-46 This comment summarizes the contents of PEIR Appendix P. No further response to required.

AQ-47 See response to comment AQ-45. The trip generation rates for multi-family housing and other land uses account for all trip types associated with those uses; this includes anticipated fire and police station trips.

AQ-48 The location where the Armstrong Nursery is currently located will be designated as Streetfront Commercial. This designation does not preclude existing businesses from maintaining their operations. The trip generation rate for a nursery is equal to that of Streetfront Commercial (40 trips/1,000 square feet); therefore, the traffic generated by the nursery or any other allowed commercial business that may be developed are accurately captured in the analysis.

AQ-49 As previously noted, the trip generation rates for multi-family housing and other land uses account for all trip types associated with those uses; this includes anticipated fire and police station trips. Further, the regional model accounts for anticipated emergency vehicle trips throughout the region. These trips do not scale proportionally with increased residential units. Trips are accurately presented in the analysis.

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<p>AQ-50 B. <u>The Traffic Analysis Fails to Account for the Cumulative Impacts of the Proposed River Walk Development.</u></p> <p>The Daily Traffic Volumes and the Levels of Service (LOS) for Linda Vista Road between Napa Street and Marian Way are essentially identical under the existing conditions and the preferred plans. (PEIR, Appendix B, Figure 3-2, p. 14 and p. 43. Similarly, the Friar's Road segment between Napa Street and Colusa Street shows an actual decrease in Daily Traffic Volume, from 19550 trips to 16,900 trips.</p> <p>However, the River Walk development proposes approximately 4,300 dwelling units that would utilize Friar's Road. The failure to consider the cumulative impacts of these additional units is a major inadequacy of the PEIR.</p> <p>AQ-51 C. <u>The PEIR Fails to Account for the Number of Vehicular Trips Generated by Each Additional Unit in the Project Area under the MCSP.</u></p> <p>At the August 28, 2018 meeting of the Ad Hoc Committee of the Linda Vista Planning Group on the Morena Corridor Specific Plan, Claudia Brizuela, traffic engineer for the City of San Diego, stated: "We are not assuming that every [residential] unit is a vehicular trip." The PEIR fails to account for the number of vehicular trips generated by each unit. It fails to disclose how many occupants per unit were included in the traffic analysis and how many cars were assumed to be owned by each of these occupants.</p> <p>AQ-52 The project is talked of as attractive to Millennials. According to a CNBC article, nearly 80% of millennials own cars and 75% of those who do not aspire to own one. (Accel + Qualtrics Millennial Study, 2017.) Additionally, the 2016 Demographics study conducted by the San Diego Health and Human Services Agency showed that in the region that includes the plan area, 75.9% drove alone to work, 7.9% carpooled, and only 2.7% used public transportation.</p> <p>AQ-53 While we recognized the aspirational objectives of the MCSP regarding use of public transportation, the PEIR must determine whether the forecast of vehicular trips is realistic. Until that is done, the PEIR must be deemed inadequate.</p> <p>AQ-54 D. <u>The PEIR Fails to Provide Feasible Plans to Implement the Mobility Improvements Needed for the Proposed Project.</u></p> <p>The timing and phasing of the infrastructure updates outlined in the MCSP is critical. Planning Department representative Michael Prinz has told the Ad Hoc Committee on the MCSP that eminent domain will not be used to procure property needed to implement the mobility improvements outlined in the MCSP.</p> <p>AQ-55 The Impact Analysis outline in section 6.2.3 of the PEIR is flawed because it "assumes all of the transportation improvements described in Table 3-2 are implemented." (PEIR, p. 6.2-7.) However, the vast majority of the improvements in that table are infeasible because they require funding that has not been provided, and/or property procurement that require either eminent domain or willing sellers.</p>	<p>AQ-50 The Transportation Impact Analysis (provided as Appendix B of the Draft PEIR) analyzed land uses that have been approved and those included in the Regional Model. The future Riverwalk Development has not been approved by City Council; therefore, the Regional Model assumptions for that site were included in the analysis. As shown in Appendix G of the Transportation Impact Analysis, this includes over 50,000 trips generated at the Riverwalk site.</p> <p>AQ-51 The Transportation Impact Analysis does account for the number of vehicular trips generated by each unit. In addition, SANDAG's Series 12 Travel Forecast Model accounts for person trips associated with transit, walking, biking, and vehicles. Model Output plots are included in the Appendices of the Traffic Impact Study.</p> <p>AQ-52 Comment noted. This comment does not suggest an inadequacy in the analysis of the PEIR.</p> <p>AQ-53 See response to comment AQ-45 regarding calculation of trip generation rates.</p> <p>AQ-54 Comment noted. This comment does not suggest an inadequacy in the analysis of the PEIR.</p> <p>AQ-55 While funding for implementation of all improvements and necessary right-of-way may not be currently available for all identified improvements, the analysis assumes all improvements would be implemented in order to provide adequate disclosure of potential impacts under build-out of the plan. It is anticipated that over time funding will be identified and right-of-way acquired as specific improvements are proposed for development.</p>
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AQ-56 Table 6.2-4 compares the existing and proposed project Level of Service results. It shows the number of unacceptable Level of Service freeway segments (i.e., LOS worse than D) in the morning stays the same at two, but six freeway segments degrade by one Level of Service, and four of them degrade from C to D. (PEIR, p. 6-2-15.) This does not even account for the inaccurate forecasted traffic volume, as described in subsection A above. Indeed, the actual number of additional unacceptable level of service freeway segments may be significantly higher.

AQ-57 According to the same table, in the evening the number of unacceptable level of service (worse than LOS D) freeway segments increases from two to six. In addition, ten segments degrade by one level of service, five of which degrade from LOS C to LOS D. (PEIR, p. 6-2-15.) Again, due to the inaccurate and underestimated traffic volume forecasts set forth above, the actual number of unacceptable and degraded LOS freeway segments may be quite higher.

AQ-58 The PEIR fails to provide feasible mitigation measures to reduce or eliminate these impacts, asserting instead that freeway improvements are not under the authority of the city. Improvements have been identified within the SANDAG Regional Plan, but when the improvements will be implemented and the effectiveness of the improvements is undetermined. The unavoidable significant impacts to these freeway segments imposed under the MCSP will exact a large toll not only on the residents of the plan area and the adjacent areas, but on everyone traveling on these freeways.

AQ-59 The PEIR is faulty because there are available mitigation measures that would reduce the adverse impacts. The mitigation measure is to recommend a reduction in the proposed density in the project area.

AQ-60 E. The PEIR Fails to Provide Sufficient Mitigation Measures to Reduce or Eliminate the Impacts that will be Generated by the MCSP.

The PEIR references three roadway segments and four intersections where mitigation measures could potentially reduce significant impacts. These include

- 6.2-1 Segment on Clairemont Drive from I-5 n/b ramp to Denver Street;
- 6.2-2 Segment on Denver Street from Clairemont Drive to Ingulf Street;
- 6.2-3 Segment on Morena Boulevard south of Linda Vista Road;
- 6.2-5 Intersection of Denver Street and Clairemont Drive.

The PEIR does not propose any mitigation measures for these segments as part of the MCSP (PEIR, p. 6.2-23.)

The PEIR states that while implementation of the improvements it identifies would reduce impacts to less than significant, no mitigations are included in the MCSP and Impact Fee Study (IFS) for 6.2.1 through 6.2-3 and 6.2-5 because no funding mechanism exists for them and the mitigation measures would be inconsistent with the mobility goals. (PEIR, p. 6.2.24.)

AQ-56 The future year traffic volumes were developed utilizing the anticipated land use quantities and standard industry practices resulting in acceptable projections. Therefore, the impacts disclosed within the Draft PEIR are accurately reflective of the anticipated land use and transportation network changes. Also refer to responses AQ-47 through AQ-51.

AQ-57 Please see response to comment AQ-56.

AQ-58 Impacts to freeway facilities are cumulative, which is why freeway-related solutions are planned, funded, and implemented at the regional level, through Caltrans and SANDAG and not at the individual project level. Each individual project (and unit within) will be responsible for paying a Regional Transportation Congestion Improvement Program fee, which goes towards regional improvement projects intended to alleviate congestion.

AQ-59 As noted in Section 6.2 of the PEIR, the identified mitigation measures at these locations were not included in the Specific Plan; therefore, the impacts are significant and unavoidable. Reducing density in the project area would not achieve project objectives.

AQ-60 The PEIR discusses the rationale for why impacts would remain significant and unavoidable (see Sections 6.2.5 and 6.2.6 of the PEIR). The improvements listed would be contrary to the Mobility Element goals of the Specific Plan, and thus, were not included in the Specific Plan. Therefore, the adoption of the measures would not be recommended for inclusion in the project's MMRP. Candidate Findings and a Statement of Overriding Considerations, pursuant to CEQA, would be required to be adopted.

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AQ-61

The PEIR fails to provide sufficient justification that the mitigation measures identified are infeasible and inconsistent with the mobility goals. Further study is required to provide cost estimates for each of the proposed improvements and to clearly explain how there are no funding mechanisms available through city, state and federal funding options. All the identified mitigation measures should be included within a revised MCSP and Impact Fee Study as a project design feature rather than a proposed mitigation measure. If the Planning Department continues to assert the mitigation is financially infeasible, the proposed project densities and height limits should be reduced to limit the transportation impacts.

IV. NOISE, SECTION 6.3

AQ-62

The MCSP would increase the amount of density permitted “by right,” without regard to the TOD process. Such projects would be ministerial and the PEIR admits there is no procedure to ensure that exterior noise resulting from increased vehicular traffic would be adequately attenuated. It states that implementation of the Specific Plan would result in changes to the land uses resulting in the introduction of new noise-sensitive land uses in the form of increased residential uses that would be potentially significant. (PEIR, p. 6.317.)

It makes a finding that a “significant impact related to exterior noise levels would occur for ministerial projects exposed to vehicular traffic noise levels in excess of the land use and noise compatibility levels established in the General Plan Noise Element. . . .” (*Ibid.*)

AQ-63

The PEIR finds these impact to be “Significant and Unavoidable,” but identifies no mitigation measures. (PEIR, p. S-10.) There is mitigation in the form of lesser density imposing lesser noise impacts. The PEIR is deficient for failing to consider this mitigation.

V. AIR QUALITY, SECTION 6.4

AQ-64

The PEIR, in discussing air quality, analyzes as Issue 1 whether the MCSP conflicts with or obstructs implementation of air quality plans, particularly in relation to the concerns of the Regional Air Quality Strategy (RAQS) about reactive organic gas (ROG) and oxides of nitrogen (NOx), a precursor in the formation of Ozone. (PEIR, p. 6.4-3.) It concludes the MCSP would conflict with implementation of the RAQS, resulting in a potentially significant impact on air quality. (PEIR, p. 6.4-4.)

AQ-65

NOx is a highly reactive gas that is a major contributor to two other air pollutants, particulate matter and ozone. These are among the most regulated air pollutants in the United States and California due to the large impacts these pollutants have on public health and the environment. NOx and particulate matter have been found by scientific studies to reduce lung function and exacerbate the symptom of asthma. Ozone is the prime precursor to smog. Environmental Protection Agency analyses have found that short term exposure to ozone induced or was associated with statistically significant declines in lung function. It increases emergency room visits, hospital admissions for respiratory conditions, and is a likely cause of a range of other health and mortality issues. EPA analysis of ozone in 2013 found strong evidence that ozone concentrations impair many native plants and trees.

AQ-61 Refer to response to comment AQ-60. Prior to a decision on the project, Candidate Findings and a Statement of Overriding Considerations will be provided to decision makers to make a final decision on infeasibility and will be available to the public that detail specific reasons why each significant and unavoidable impact is infeasible.

AQ-62 The comment reiterates what is stated in the PEIR. This comment does not suggest an inadequacy in the analysis of the PEIR.

AQ-63 Alternatives are offered in order to present a range of options to decision makers to consider whether feasible alternatives could be implemented to achieve the same result while lessening identified significant impacts. Two lower-density alternatives (Mid-Density and Low-Density alternatives) have been considered and analyzed in the PEIR; however, noise impacts would be the same under each of these alternatives in comparison to the proposed project. Refer also to response AQ-61.

AQ-64 Comment noted. This comment does not suggest an inadequacy in the analysis of the PEIR. Rather it summarizes the information included in Section 6.4 of the PEIR related to conflicts with regional air quality plans.

AQ-65 Comment noted. This comment provides information related to NOx as a highly reactive gas and details some prospective health concerns associated with its emissions. No issues related to the adequacy of the analysis contained within the EIR are raised.

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AQ-66 The PEIR acknowledges that such future toxic air emissions associated with the build-out of land uses within the specific plan area would be greater than anticipated emission under the adopted community plan. Rather than trying to prevent the resulting ill-health and premature deaths the MCSP would cause, the PEIR's solution is to call for changing the RAQS to permit the increase in toxic emissions! (PEIR, p. 6.4-14.)

AQ-67 Defining deviancy downward is no solution. The PEIR is again trying to force the community into a procrustean bed with potentially fatal consequences. This lowering of the bar for air toxics is unacceptable. The MCSP must be re-worked to assure compliance with air quality standards.

VI. **VISUAL EFFECTS AND NEIGHBORHOOD CHARACTER, SECTION 6.7**

A. **Scenic Views**

AQ-68 At page 6.7-3, the PEIR acknowledges that under the TOD process, buildings in excess of 45 feet would be allowed at both stations with the approval of a Planned Development Permit (PDP). These would be 100 and 65 feet buildings, which "could have the potential to obstruct views of the Mission Bay and the Pacific Ocean, which are identified in the Linda Vista Community Plan."

AQ-69 This is not a could, it is a would, and the PEIR correctly concludes the impacts would be significant. (*Ibid.*, PEIR, p. 6.7-7) However, rather than proposing meaningful mitigation, the PEIR baldly states (but does not specify where) that the MCSP identifies a robust policy framework to address potential adverse effects related to scenic vistas and views. (PEIR, p. 6.7-8.)

AQ-70 The PEIR should provide a list of the policies in the proposed plan that requires development to reduce its effects on the existing scenic view. It appears the MCSP seeks to substantially change the existing land use character, without any proposed policies intended to preserve views. The appropriate mitigation is not to permit such high rise development. This mandates either an entire redo of the MCSP, or at least adoption of the so-called low density alternative.⁴

B. **Neighborhood Character**

AQ-71 The PEIR finds that implementation of the MCSP, and particular the TOD program, has the potential to change the neighborhood character that exists in the Linda Vista portion of the plan area. (PEIR, p. 6.7-3.) It notes that these would involve increased bulk, scale and height of buildings, and that it cannot be known with certainty whether it can be fully mitigated. (PEIR, pp. 6.7-4 – 6.7-5.)

AQ-72 We agree that these are significant impacts and doubt that as the MCSP is currently written they can be mitigated. However, a reduction in the heights and densities in the MCSP would ensure that the significant impacts of development under the TOD program will be

⁴ In fact, the PEIR concludes the impacts related to scenic view and vista are significant and unavoidable. (PEIR, p. 6.7-8.)

AQ-66 The comment confuses two issues relating to the air quality analysis. The impact assessment which requires updates to regional air plans is related to project consistency with existing plans. Because the Specific Plan proposes changes to land uses, it differs from the assumptions used in the RAQS. To alleviate this inconsistency, the updated community plan densities (for Linda Vista only) would be provided to SANDAG so the next update to the RAQS would incorporate the latest adopted plans. Impacts related to toxic air emissions are discussed separately (see PEIR Section 6.4.3 [Issue 3b]). As stated therein, and summarized in PEIR Section 6.4.4, potential health risks related to toxic air emissions would be less than significant based on the intermittent nature of construction activities, compliance with San Diego APCD permit requirements for stationary sources, and the Specific Plan's consistency with goals of the CARB's Air Quality and Land Use Handbook: A Community Health Perspective (CARB 2005).

AQ-67 As discussed in Section 6.4.3 and 6.4.4 (Air Quality Standards) within the PEIR, impacts associated with compliance with air quality standards was determined to be significant and unavoidable, as project-level emissions information is not available at this time and it cannot be guaranteed that operational air emissions from the future developments within the planning area could be fully mitigated to below a level of significance even with implementation of mitigation measure AQ 6.4-2 as identified in the PEIR.

AQ-68 This comment restates information contained in the PEIR. This comment does not suggest an inadequacy in the analysis of the PEIR.

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	<p>AQ-69 The PEIR acknowledges that changes in density and development allowances could result in significant impacts. The Specific Plan contains development design policies focused on reducing impacts to neighborhood character (see Specific Plan Chapter 4.4). Notwithstanding both the requirement to follow policy guidance and the future processing of discretionary permits (requiring additional CEQA review), the PEIR finds that at the program level impacts to scenic vistas/views and neighborhood characters are significant and unavoidable. Candidate Findings and a Statement of Overriding Considerations would be required by the City upon adoption of the Specific Plan.</p> <p>AQ-70 A Guiding Principle of the Specific Plan is to preserve public views of Mission Bay and development and design policies are provided to ensure future development is sensitive to views of the bay and other scenic resources.</p> <p>AQ-71 The comment restates information in the PEIR. See response to comment AQ-68.</p> <p>AQ-72 See response to comments AQ-68 and AQ-69.</p>
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substantially mitigation while still assisting in the implementation of the Climate Action Plan. Please see the discussion of alternatives in this Comment letter.

VII. **GREENHOUSE GAS EMISSIONS, SECTION 6.8**

AQ-73

The PEIR posits that under the MCSP, Greenhouse Gas Emissions (GHG) would increase over those in the current plan from 90,328 metric tons annually to 108,468 metric tons annually, an increase of 20% in GHG. (PEIR, p. 6.8-5, Table 6.8.2.) It acknowledges the GHG emissions increase is due to the increased density of development that would be allowed within the Linda Vista portion of the MCSP. (PEIR, p. 6.8.5) Even while admitting the increase in GHG emissions would amount to 20%, it amazingly finds that amount to be “less than significant.” (PEIR, p. 6.8-9.) That is an incredible if not absurd statement.

AQ-74

The increase in GHG emission is probably understated. To manipulate assumptions to even reach the 20% in emissions increase, the PEIR relies on an assumed reduction of automobile GHG emissions of 5,054 metric tons annually. In turn, this is based on the unsupported assumption that those living adjacent to the trolley stations AND those living within a half mile of those stations will shift to trolley ridership. As noted in this Comment letter, *ad nauseam*, there is no ridership study to support this claim.

AQ-75

The calculation of GHG emissions under the MCSP also appears to be partially based on new construction in the plan area being required to include all mandatory green building measures. (PEIR 6.8-7.) However, as set forth more fully in the discussion of section 6.9, suggestions are not requirement. Specifically, the MCSP:

Encourages, rather than requires, the installation of solar energy generation systems (Policy 4.6.3);

Encourages, rather than requires, the implementation of wind energy generation systems (Policy 4.6.4);

Encourages, rather than requires, the adaptive reuse of existing buildings in conjunction with improvements to increase energy efficiency and building longevity (Policy 4.6.5). (MCSP, p. 67; PEIR, p. 6.9-4.)

Moreover, the MCSP encourages, rather than requires, adherence to LEED standards for construction;

The MCSP also encourages, rather than requires, implementation of energy and water efficient measures for commercial use. (MCSP, p. 74.)

Thus, even the projected increase in GHG emissions are likely understated because the PEIR seemingly counts on implementation of mandatory construction standards that are not mandatory, according to the MCSP.

AQ-76

As previously stated, we do not believe the increase in GHG emissions is less than significant, and we further believe that it can be mitigated by providing for lesser density than set

AQ-73 As discussed in Section 6.8 of the PEIR, GHG emissions would be greater for proposed land uses identified within the Specific Plan area when compared to build-out of the Specific Plan area based on the adopted community plan land uses, which is largely due to increased density and associated vehicle emissions. Emissions from all sources were found to increase from the adopted community plan land uses. Thus, the increase in GHG is a direct result of implementation of CAP Strategies and the General Plan's City of Villages Strategy (e.g., placing high density near transit). Increasing residential and commercial density along transit corridors and Community Villages within a TPA would support the City in achieving the GHG emissions reduction targets of the CAP, and thus, impacts associated with GHG emissions were determined to be less than significant.

AQ-74 Refer to response to comment AQ-73.

AQ-75 The GHG analysis does assume future projects would be required to implement mandatory green building measures. Whereas the language in the Specific Plan do not pose requirements, other existing regulations would ensure incorporation of appropriate green building measures including the California Building Code, as adopted by the City, and Climate Action Plan Consistency Checklist requirements.

AQ-76 Refer to responses to comments AQ-73 and AQ-75.

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forth in the MCSP. We further believe the MCSP should require, rather than encourage, the environmental policies set forth in the Plan.

VIII. ENERGY, SECTION 6.9

A. Transportation Energy Use

AQ-77

The PEIR project that the MCSP would generate significantly more Average Daily Trips (ADTs) than the current land use does. It finds that currently the plan area generates 93,602 ADTs and this would go to 116,130 under the plan, an increase of 22,525. (PEIR, p. 6.2-2.) It justifies this increase on the basis that convenient access to the trolley and bus lines, as well as proximity of homes to service, combined with proposed (albeit unlikely, see Section III, D, above) mobility improvement would increase opportunities for non-single-occupancy vehicle travel. (PEIR, p. 6.9.3)

AQ-78

The PEIR is inadequate because this rationalization is unsupported by factual, objective studies to demonstrate the validity of its conclusion that a sufficient number of residents or workers in the plan area will abandon daily use of their vehicles for mass transit and bikes to mitigate the significant negative energy effects of the high density on energy uses. The PEIR must be revised to provide for a trolley ridership study to show that current San Diego residents of high rise/high density developments in fact regularly used these alternative means of transportation in significant numbers to justify the tremendous increases in transportation energy uses.

AQ-79

Although it lacks the height and density of what would be built under the MCSP, it seems feasible to perform a ridership study on mass transit use by the resident of the Morena Village project at Napa and Linda Vista Road. The Ad Hoc Committee has been requesting such a study virtually since its inception, to no avail. Instead, the Planning Department has ploughed through the project approval process without any concern as to whether its assumptions are valid.

B. Building Energy Use

AQ-80

The PEIR utilize the California Emissions Estimator Mode to estimate residential and non-residential energy uses under the MCSP. The PEIR anticipates that any development will comply with all current building codes, regulations and requirements. Nonetheless, there is a significant increase in energy use under the MCSP. (PEIR, p. 6.9-3 and Table 6.9-1, therein.) The PEIR and the underlying MCSP suggest several design policies that support energy-efficient building designs. (PEIR, p. 6.9-4; MCSP, pp. 67-68, 74.)

AQ-81

However, suggestions are not requirements, and only "encourage" compliance with the design policies. For example, Policy 4.6.11 encourages the use of graywater reuse systems for landscape irrigation to supplement potable water supplies. Instead, the MCSP should require the use of graywater reuse systems. The development of an area with new buildings is a perfect opportunity to implement well-accepted energy and water-saving policies. Once a building is completed it is much more difficult to retrofit it to use graywater.

AQ-77 The City recognizes that it cannot be guaranteed that future residents will take advantage of transit; however, planning for high-density residential development near high-quality transit is a focus of the City General Plan City of Villages Strategy, the City's Climate Action Plan, and is consistent with SANDAG strategies identified in the Regional Plan.

AQ-78 See response to comment AQ-77.

AQ-79 See response to comment AQ-77.

AQ-80 The comment reiterates portions of the PEIR. This comment does not suggest an inadequacy in the analysis of the PEIR.

AQ-81 The Specific Plan contains policies and supplemental development regulations for development within the Specific Plan area and is intended as an overall guidance document for development within the Specific Plan. Future discretionary projects will be required to demonstrate consistency with the overall goals and policies of the Specific Plan; however, specific policies are written with flexibility in consideration of the range of projects that could be developed under the Specific Plan. For example, not every project would be suitable for graywater reuse systems.

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AQ-82

Accordingly, this emphasis on “encourage” and similar non-mandatory terms shows the inadequacy of the PEIR and the MCSP. Both need to go back to the drawing board.

IX. **HEALTH AND SAFETY, SECTION 6.10**

AQ-83

Section 6.10 discusses the health and safety impact that could result from the implementation of the MCSP. It raises, as Issue 4, Hazardous Materials Sites and Health Hazards. (PEIR, p. 6.10-5.) The PEIR notes that development of sites with existing contamination in accordance with the MCSP could potentially pose a hazard to the public or the environment. (*Ibid.*) It concludes that while there are no policies in the MCSP relative to hazardous materials, the general plan includes policies to protect the health, safety and welfare of residents relating to hazardous materials. (PEIR, p. 6-10.2.)

This is not adequate. The California Department of Toxic Substances Control in a Notice of Preparation letter dated October 17, 2016 expressed concern about the project area, stating:

“Based on DTSC’s EnviroStor database, investigations were conducted previously at the project site. Chlorinated compounds were detected in groundwater and soil vapor. DTSC has no record indicating that the extent of the contaminated plumes were completely defined.

“DTSC is uncertain whether the investigation and the preliminary report were conducted under oversight of any State or local agencies. As a result, DTSC recommends that the EIR should:

- “1) Identify and determine whether current or historic uses at the project site may have resulted in any release of hazardous wastes/substances.
- 2) Identify any known or potentially contaminated sites within the proposed project area. For all identified sites, the EIR should evaluate whether conditions at the site may pose a threat to human health or the environment.
- 3) Identify all investigations and remediation conducted at the site. DTSC’s EnviroStor database indicates that chlorinated compounds have been detected in soil vapor and groundwater beneath the project site.
- 4) Include an updated risk assessment using currently approved screening levels.”

(PEIR, Appendix A.)

A policy must be added to the MCSP related to the presence of these materials. Moreover, the PEIR should be revised as recommended by the Department of Toxic Substances Control to ensure public safety in future developments.

X. **PUBLIC SERVICES AND FACILITIES, SECTION 6.13**

AQ-84

Section 6.13.2 begins, honestly enough, by noting that public services and facilities impacts could occur if implementation of the Plan would promote growth patterns which could cause significant environmental impacts in order to maintain service ratios, response times or other performance objectives. (PEIR, p. 6-13-1.) It then outlines concerns about police

AQ-82 See response to comment AQ-81.

AQ-83 State and federal regulations, along with the City requirements, would ensure that future projects adhere to specific guidelines regarding the use, transportation, disposal, and accidental release of hazardous materials. In accordance with local city, county, state, and federal requirements, any new development that involves contaminated property would necessitate the clean-up and/or remediation of the property in accordance with applicable requirements and regulations. Through compliance with the extensive regulatory framework surrounding hazardous materials and contaminated sites, the PEIR finds impacts associated with hazardous materials sites and health hazards would be less than significant.

AQ-84 This comment reiterates language from the discussion of Public Service and Facilities (Section 6.13 of the PEIR). As discussed in this section, impacts to public facilities (i.e., police protection, parks and recreation, fire and life safety protection, libraries, and school) were determined to be less than significant. The PEIR states that as future projects are developed within the Specific Plan area, developers would be required to pay Development Impact Fees that would ensure any impacts associated with police protection, parks and recreation, fire and life safety protection, and libraries would be less than significant, thus supporting the conclusions of the PEIR.

protection, parks and recreations, fire/life safety protection and libraries. (PEIR, pp. .6.13-2-6.13-6.)

In concluding however, it states:

“Regarding police protection, the proposed Specific Plan does not include the construction of new police facilities”;

“Regarding parks and recreation facilities, there is an existing and projected deficit in population based parks which is an adverse impact but not considered significant at the program level.”;

“Regarding fire/life safety protection, implementation of the propose project would result in an increase in overall population which could result in a change in fire-rescue response times. . . . The Citywide study does not identify a need for a new or expanded facility within the Specific Plan communities and the Specific Plan does not propose any new fire station or fire station expansion”;

“No new or expanded libraries are planned at this time, and the Specific Plan does not propose the construction of library facilities.”

(PEIR, pp. 6.13-7 – 6.13-8, emphasis added.) Without support, it pontificates that impacts to police protection, parks and recreation facilities, fire/life safety protection and library services are “less than significant” so no mitigation is required. (PEIR, p. 6.13-8.)

AQ-85

This is precisely the type of error criticized in the introductory section, the fallacy that in-fill development can be done on the cheap without paying for the improved infrastructure needs that it creates. As also noted in the Introductory section, the MCSP does not provide for infrastructure. The PEIR makes an illusory promise that a comprehensive Impact Fee Study will be updated for the Linda Vista community planning area after the adoption of the MCSP to include fees for police facilities funding. (PEIR, p. 6-13.2.) Similarly, it promises that after adoption of the MCSP, a comprehensive Impact Fee Study will be completed to define applicable development impact fees for park funding. But it adds that these “fees would not be adequate to address the extent of the parkland deficit.” (PEIR, p. 6.13-3.)

This is not adequate, The MCSP proposes to increase residential density in an area currently lacking recreational facilities, unable to hold additional public recreational facilities and without any assurance the funding for future recreational facilities will be available. The increase in population will increase the demands on public services and exacerbate the current deficiencies. Contrary to what the self-justifying PEIR asserts, this is a significant impact and policies should be added to ensure infrastructure in the Linda Vista Community Plan area to address the proposed increases in population. Additionally, the Planning Department needs to provide a list of approved immediate infrastructure improvements will be provided in the Plan area

XI. **CHAPTER 10. INADEQUATE ANALYSIS OF ALTERNATIVES**

AQ-85 Analysis of impacts to public services (police protection, fire protection, schools, libraries, and parks and recreation) are assessed in Chapter 6.13 of the PEIR. The analysis is adequate for a program-level evaluation as there are mechanisms in place for future development to fund necessary services through Development Impact Fees. The IFS is considered part of the project analyzed in the PEIR (see PEIR Project Description Section 3.3.9) and will be adopted after the Specific Plan.

AQ-86

In Chapter 10, the PEIR purports to analyze alternatives to the MCSP. The analysis is inadequate because rather than being dispassionate, it is a polemic for a variation of the high rise/high density presupposition of the Planning Department and the developers who would benefit from it.

A. The Analysis presents a tautology.

The analysis of alternates to the MCSP states that among the primary goals, recommendations and objectives of the MCSP are (1) to promote high residential density and employment opportunities and (2) to leverage regional transit investment to provide critically needed housing by designating high-density residential development. (PEIR, pp. 10-1 - 10-2.) It then concludes that these objectives can be accomplished by adopting the MCSP or its preferred alternative. Essentially, it says high density development can only be accomplished by high density development. This is a tautology. It is inadequate because it does not begin by questioning the presumption that these are desirable objective, and if desirable, whether their benefits can be achieved by means other than the MCSP or its variants. For example, mixed use development can be attained with lesser density than the MCSP imposes, as can be seen from the Morena station project at Napa and Linda Vista Road.

B. The Analysis for No Project/Adopted Alternative Analysis is Not Adequate.

AQ-87

Page 10-4 begins the analysis of the No Project alternative. It states, without substantiation, that there would not be any mobility improvements within the specific plan area. The PEIR must explain why road improvements would not occur absent high density development.

AQ-88

The need for such explanation is intensified by the Analysis stating the same mobility improvements would be accomplished with lower density than is provided in the MCSP (see PEIR, p. 10-21, subsection f.)

C. The Analysis for the "Mid Density" Land Use Plan Alternative is Inadequate.

AQ-89

Page 10-11 begins the discussion of the so-called "Mid-Density" alternative. This is an Orwellian misnomer because this alternative would retain the building heights of 100 and 65 feet for the Tecolote Village and Morena Station District respectively, and also include the TODE provisions to justify unreasonably low off-street parking requirement.

This alternative should properly be described as the "High Rise/Density" alternative. While it would lower the density requirements at the two stations to 73 and 54 units to the acre respectively, it fails to explain why this reduced density still requires the high rise construction of 100 and 65 feet of the MCSP. It is reasonable to believe that fewer units would mean less height. Why this alternative does not explain that reduced density still requires the same excessive building heights is a mystery the PEIR should be required to solve.

AQ-86 The CEQA Guidelines Section 15126.6 requires that an EIR compare the effects of a "reasonable range of alternatives" to the effects of a project. The CEQA Guidelines further specify that the alternatives selected should feasibly attain most of the basic project objectives and avoid or substantially lessen one or more significant effects of the project. The "range of alternatives" is governed by the "rule of reason," which requires the EIR to set forth only those feasible alternatives necessary to permit an informed and reasoned choice by the lead agency and to foster meaningful public participation (CEQA Guidelines Section 15126.6[f]). CEQA generally defines "feasible" to mean an alternative that is capable of being accomplished in a successful manner within a reasonable period of time, while also taking into account economic, environmental, social, technological, and legal factors.

The PEIR includes analysis of three alternative scenarios: 1) the No Project Alternative; 2) the Mid-Density Alternative; and 3) the Low-Density Alternative. It has been determined that this range of alternatives are reasonable and would attain most of the project objectives and avoid or lesson one or more significant effects of the project.

AQ-87 The No Project Alternative evaluates the scenario where development would occur under existing conditions/plans. The proposed density would not occur under this alternative and none of the mobility improvements identified in the PEIR would occur under this Alternative.

AQ-88 In contrast to the No Project Alternative, the Low-Density Alternative incorporates the mobility improvements identified in the Specific Plan. The description of each alternative is provided in PEIR Sections 10.1 and 10.3, respectively.

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	<p>AQ-89 The Mid-Density Alternative is described in PEIR Section 10.2.1. It is called the Mid-Density Alternative because it would reduce the maximum density allowed with a Planned Development Permit in the Tecolote Village District from 109 to 73 dwelling units per acre, and would cap the density in the Morena Station District at 54 dwelling units per acre. There are numerous approaches to building design and retaining the height limits would provide flexibility for future development to accommodate density.</p>
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This is a major concern because, as set forth at page 10-21, the analysis admits this alternative would retain the “same significant and unavoidable impacts related to scenic vistas and views and neighborhood character as the” MCSP. The PEIR must be re-done to analyze how the reduced density proposed by this alternative could be accommodated by lower rise buildings, what the height of those buildings would be, and the impacts of those lower rise buildings.

D. The “Low Density” Alternative is a Basis for Negotiations.

AQ-90

Starting at page 10-22, the PEIR begins the discussion of the so called “low density” alternative. Under this alternative density would nearly double, from 29 units to the acre to 54 at both sites, and the height limit by right would increase by 50%, to 45 feet. That is not low density and properly should be called mid-density⁵. These comments will, nevertheless, use the term “Low Density” despite its inaccuracy.

AQ-91

This alternative could generate up to 3,780 additional dwelling units, would result in less traffic overall, and would avoid a significant impact along one segment associated with the MCSP. (PEIR, p. 10-22.) In addition, the reduced number of trip generations under this alternative would mean fewer GHG emissions than under the MCSP. (PEIR, p. 10-24.) This alternative supports increased density near the transit stations and would be consistent with CAP goals. (PEIR, p. 10-25.)

AQ-92

The “Low Density” alternative is worthy of further environmental analysis as to traffic, funding of increased infrastructure to meet the burdens it would impose, and affordable housing. Because of the lower heights of buildings, building costs per unit should be less, allowing for greater affordability of housing.

E. The Alleged “Environmentally Superior Alternative” is Neither Superior nor Desirable.

AQ-93

At page 10-25 the PEIR concludes that the environmentally superior alternative is the high rise/density option. It is not, because the amount of density it would impose on the community is not acceptable, the inadequate off-street parking requirements are not reasonable, and the visual blight and the change to the character of the community are contrary to the community’s interests and concerns. Both this alternative and the MCSP should be rejected.

XII. THE MCSP DOES NOT HELP SOLVE SAN DIEGO’S AFFORDABLE HOUSING NEEDS.

AQ-94

There is no section in the PEIR to address shortcomings of the MCSP in providing affordable housing. That is for obvious reasons. The MCSP does not provide affordable housing, so the consultant writing the PEIR did not provide commentary.

We need teachers, firefighters, nurses and police officers in San Diego, but they are being priced out of housing. This project area, which is close to the center of San Diego and provides

⁵ By way of comparison, density at the current Morena Station District is just under 29 units to the acre.

AQ-90 This comment reiterates language included within the PEIR. This comment does not suggest an inadequacy in the analysis of the PEIR.

AQ-91 This comment reiterates language included within the PEIR. This comment does not suggest an inadequacy in the analysis of the PEIR.

AQ-92 The traffic analysis prepared for the alternative is adequate. See response to comment AQ-88.

AQ-93 The Mid-Density Alternative has been determined to be the Environmentally Superior Alternative pursuant to CEQA Guidelines Section 15126.6. It is selected as such because it would result in fewer/lesser significant impacts compared to the other alternatives achieving the most project objectives. See PEIR Table 10-2.

AQ-94 See responses to comments AQ-11 and AQ-12.

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access to public transportation, does not even mention affordable housing. This is an appalling shortcoming.

Linda Vista has long been a working-class neighborhood. The MCSP proposes to gentrify it with high rise/high cost housing, and the PEIR does not even mention it. This is a matter of equity and social justice. The MCSP must be reformed to address this gaping inadequacy.

CONCLUSION

AQ-95

Our community understand that land in the Morena Corridor is being under-utilized. We believe that road re-alignment, some increased residential density, affordable housing, mixed use, and provisions to fund the supporting infrastructure are necessary. The "Low Density" alternative is a basis to begin the discussion and the analysis.

The Planning Department has wasted years and resources in ignoring community input to produce a plan that is broadly objectionable to Linda Vista. It has wasted yet another year and more funding to produce an environmental impact report to justify that plan. It has made a mockery of community input and tried to show the public that its participation is futile. It is time for the Planning Department instead to engage in meaningful dialogue with the community.

Come now, and let us reason together.

AQ-95 Concluding remarks are noted.

Letter AR

September 28, 2018

Rebecca Malone, Environmental Planner
City of San Diego Planning Department
9485 Aero Drive, MS 413
San Diego, CA 92123

Re: Morena Corridor Specific Plan, No. 582608/SCH No. 2016101021
Comments on Program Environmental Impact Report (PEIR)

Dear Ms. Malone:

AR-1 The Community of Linda Vista, by and through the Linda Vista Planning Group, by a unanimous vote, adopted the following comments regarding the PEIR for the Morena Corridor Specific Plan (MCSP), as referenced above.

AR-2 On September 17, 2018, during the comment preparation period, the Planning Department issued a memorandum that promises three changes “will be made to the draft Morena Corridor Specific Plan,” to wit: (1) language will be added supporting a pedestrian/bicycle bridge; (2) the plan will be amended to retain four lanes on Morena Boulevard from Ingulf Street to Knoxville Street; and (3) the Transit-Oriented Development Enhancement Program within the plan will be amended to remove the ability to seek a maximum height of 100 feet in the Tecolote Village District and 65 feet in the Morena District through Planned Development Permits, and the height limit by right will be 45 feet. (Memo, attached to these Comments as Exhibit 1.)

AR-3 The Memo, however, also states that these changes “will not affect the proposed land use designations, zones or densities.” (Emphasis added.) As the changes are mere promises, no representation is made regarding the ability of developers to seek building heights between 45 and 100 feet near the Tecolote Station, and 45 and 65 feet near the Morena Station, and as the PEIR comment deadline of October 1, 2018 has not lapsed, the comments in this letter will address the MCSP and PEIR as currently presented.

I. PRELIMINARY STATEMENT

A. The MCSP and PEIR are fundamentally flawed, *ab initio*

AR-4 1. *The MCSP imposes a preconceived idea of high density without regard for community concerns.*

The Summary to the PEIR states that “objectives were identified to outline the underlying purpose for the proposed project.” (PEIR, p. S-2.) The passive voice does not identify who identified the objectives, but the objectives are to:

“Create a focused long-range plan for the Linda Vista Community Plan area intended to promote high-density residential and employment opportunities . . . consistent with the City of Villages strategy and the Climate Action Plan (CAP) . . .”

“Establish land uses that facilitate transit-oriented mixed use development . . .”

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AR-1 through AR-14

Please refer to responses AQ-1 through AQ-15 as these are duplicate comments.

“[P]rovide critically needed [but not necessarily affordable] housing by designating high-density residential and mixed-use development within close proximity to the transit station.”

(PEIR, p. S-2, emphasis added.) Those objectives were developed without community input.

AR-5

The Linda Vista Community had the citizens’ objectives in mind. On February 16, 2016 the Ad Hoc Committee for the Morena Corridor Project unanimously adopted a “Vision Statement and Guiding Principles” that called for (1) retention of the current height limits; (2) no worsening of traffic; (3) density compatible with the existing neighborhoods; and (4) infrastructure and parks for any increases in density. (See, Comments of Howard Wayne, on file with the Planning Department and attached to these Comments as Exhibit 2, p. 1.) This summary, in the form of a Comments letter, was provided to the Planning Department in August 2017. The Comments letter was never addressed by the Planning Department, nor were the large number of community comments that were raised at July 2017 Ad Hoc Committee meeting and provided in writing to the Planning Department.

AR-6

In contravention to this Vision Statement, the MCSP instead

(1) raises the height limit from its current 30 feet by right and 45 feet by discretion, to 45 feet by right and 100 feet by discretion near the Tecolote station, and to 45 feet by right and 65 feet by discretion near the Morena Station. (MCSP, pp. 83, 84);

(2) narrows Morena Boulevard southbound to one lane (MCSP, p. 37);

(3) increases density from its current 29 dwelling units to the acre to 109 units to the acre near the Tecolote station and to 73 units to the acre near the Morena station (MCSP, p. 84); and

(4) does not provide for the infrastructure the increased density would demand.

(MCSP, p. 77.)¹

AR-7

The PEIR attempts to rationalize the MCSP under the Climate Action Plan and the City of Villages. However, when the MCSP is studied in connection with a development concept submitted to the Ad Hoc Committee in December 2016 on behalf of private interests, a reasonable inference is raised that the real rationale of the MCSP is in maximizing the land’s value for the benefit of the land owners. The inference is supported by their striking similarities; among them, high-rise buildings and restrictions for off-street parking.

¹ The admission in the PEIR that from the beginning the “objectives were identified to outline the underlying purpose for the proposed project” to promote high-density residential construction validates Wayne’s comment that:

The Plan is so at odds with the community input as to strongly suggest that the Planning Department had a predetermined outcome and the “collaborate process” was so much “checking the box” of public participation. (Exhibit 2, p. 2.)

2. The MCSP and the PEIR are not supported by a ridership study.

AR-8

The Transit-Oriented Development Enhancement (TODE) program is used by the MCSP as the basis for the extreme densification in the vicinity of the two trolley stations. (MCSP, p. 84.) Unstated is the MCSP's assumption that residents of the high-density area will regularly use the trolley instead of vehicles. Indeed, at the December 2016 Ad Hoc Committee meeting, a development concept presented allocated less than one parking space per dwelling unit.

AR-9

What is lacking, despite repeated requests made at Ad Hoc Committee meetings, is any study to show that residents of the TODE areas will rely on the trolley for basic transportation.² No ridership study is presented in the PEIR. If it is not shown that residents of high-density areas will regularly use the nearby trolley, then there is no justification to concentrate housing at the stations. Density could be anywhere.

AR-10

Two factors suggest the MCSP trolley-use assumption is false. First, there is already densification along nearby Friars Road where there is an existing trolley line. In this area of dense housing, the level of service of Friars Road is deficient. This demonstrates that extreme densification will not reduce vehicle use, but instead that it will worsen traffic. A second factor is the 100-foot dwellings in the TODE area require steel frame construction, which is an expensive type of building. Instead of affordable housing, the extreme densification with 100-foot buildings will create high-rise, high-cost housing. People who can afford high rents typically will own two or more cars per dwelling unit. High-rise housing will worsen traffic and not contribute to the goals of the CAP.

AR-11

3. The MCSP does nothing to alleviate the shortage of affordable housing.

AR-12

While the PEIR invokes the need for housing, the MCSP does little or nothing to accommodate for affordable housing. There is a plethora of housing for the elite, and some subsidies for low-income individuals, but the middle class is being forced out of the housing market. The trolley represents a billion-dollar investment of public funds and the public should have affordable housing to show for it.

AR-13

By way of example, a survey taken in 2017 showed that a one-bedroom apartment in the transit-oriented housing development at Napa and Linda Vista Road rents for about \$2,100 per month. Using the HUD standard that a family should not pay more than 30% of its income for housing, this requires an annual income of \$84,000, well above the San Diego median. Notably, that development is not even the high-rise, high-cost units called for in the MCSP.

AR-14

As previously discussed, high-rise housing is high-cost housing that is unaffordable for most San Diegans. The MCSP does not provide for affordable housing, but instead allows

² At the August 27, 2018 meeting of the Ad Hoc Committee, the request was met by the Planning Department representative's claim that those studies exist in national literature. Those studies were not produced, nor was there any assurance that San Diego-based ridership studies even exist.

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developers to buy out of the already inadequate 10% they are required to provide. Where there is such a large public investment as is going into the trolley, the affordability requirement should be raised to at least 40%, and policies should be established to prevent developers from buying it out.

4. *The MCSP does not provide for needed infrastructure.*

AR-15 It is ill-conceived that in-fill development can be done without providing for the improved infrastructure needs that it creates. For example, the MCSP acknowledges the need for increased water infrastructure, but does not resolve it. Instead, it says that “[i]mplementation of the Specific Plan *could* require upgrades to the existing water system infrastructure to ensure adequate capacity and sufficient fire flow.” (MCSP, p. 77, emphasis added.) It does not show how the city would pay for the upgrades to the existing water system, nor does it impose a requirement that new development fund it.

AR-16 The PEIR does no better. On page 1 of the Project Description, it states that an update to the Impact Fee Study for the Linda Vista Community Plan is also proposed for adoption “as a subsequent discretionary action.” (Emphasis added.) This is entirely inadequate. The Impact Fee study must be conducted prior to approval of the MCSP or its variants to adequately ensure public safety and demonstrate fiscal responsibility.

5. *The TODÉ program fails to provide adequate off-street parking.*

AR-17 What appears inherent in the TODÉ process is a strategy to lessen traffic by substantially reducing off-street parking requirements. In turn, this assumes, again without a study, that residents of TODÉ projects, coerced through the denial of adequate parking, will rely on the trolley for basic transportation. What is more likely is that vehicles not able to be parked in the development, will be parked on the streets, particularly the streets of nearby communities such as Overlook Heights.

AR-18 Additionally, given that the high-rise/high-cost housing the MCSP fosters would attract more affluent individuals, the likelihood of multiple vehicle ownership is high. As a Planning Department spokesperson at the August 27, 2018 Ad Hoc Committee meeting stated, the project cannot restrict the ownership of vehicles by tenants.

AR-19 One other concept advanced is disaggregating parking spaces from the price of rent, forcing tenants to pay separately for parking and presumably deterring them from owning multiple vehicles, or even one car. First, of course, the Planning Department has not provided a study to support this conclusion. Second, in a complex that would attract affluent individuals, the costs of foregoing a vehicle would greatly exceed any reasonable disaggregated rental fee.

AR-20 For all of these reasons, the apparent TODÉ strategy that seeks to coerce ridership by denying adequate parking is fundamentally flawed.

6. *The City of Villages strategy is inapplicable to the Plan Area.*

AR-21 As noted in the discussion of page S-2, the PEIR states the MCSP is designed to implement the City of Villages strategy, that is essentially creating areas where residents can

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AR-15 Please refer to response AQ-16 as this is a duplicate comment.

AR-16 Page 3-1 of the PEIR identifies adoption of an Impact Fee Study for the Linda Vista community planning area as a discretionary action that would be implemented as part of the proposed project, not as a subsequent discretionary action.

AR-17 The City recognizes that it cannot be guaranteed that future residents will take advantage of transit; however, planning for high-density residential development near high-quality transit is a focus of the City General Plan City of Villages Strategy, the City's Climate Action Plan, and is consistent with SANDAG strategies identified in the Regional Plan.

AR-18 Comment noted. The City cannot restrict vehicle ownership by citizens but can limit the amount of parking provided as a disincentive for vehicle ownership.

AR-19 The comment refers to the concept of decoupling the cost of parking from rental costs, which is not discussed in the Specific Plan or PEIR. Additionally, as detailed in Chapter 3.0 of the PEIR, new and improved parking is designated throughout the Specific Plan area and the Specific Plan includes policies to promote structured parking.

AR-20 Comment noted.

AR-21 through AR-84

Refer to responses AQ-21 through AQ-84 as these are duplicate comments.

live, shop, and work and not need to actually leave the “village” to do any of these things. Such autonomy requires employment sites, markets, theaters, gyms, and so forth in the project area.

AR-22 However, neither transit station area offers more than a few types of jobs – primarily light industry in the Tecolote area. There is no space for a supermarket, let alone the types of services people want to utilize. The City of Villages strategy might work under other circumstances, but not here because the sites are too small.

7. The PEIR fails to account for cumulative impacts of nearby proposed development.

AR-23 While purporting to investigate the environmental impacts of the MCSP, the PEIR does not consider, or for that matter even acknowledge, the impending development of the Riverwalk project in Mission Valley. The cumulative impacts of the 4300 units proposed in that area, along with the 7000 units in the MCSP, include traffic, water, infrastructure, police, fire, library and park costs, GHG emissions, toxic air emissions and others. These cannot be ignored in analyzing the Morena Corridor area. The PEIR needs to be re-done to address the cumulative impacts if both projects are approved.

8. Enforceable requirements are lacking.

AR-24 The wording throughout the MCSP needs to be revised to be enforceable. By way of example:

The MCSP encourages, but does not require, the installation of solar energy generation systems;

The MCSP discourages, but does not prohibit, the use of turf in ornamental landscaping and strongly encourages, replacing ornamental turf with water-wise landscaping;

The MCSP encourages, but does not require, the use of graywater reuse systems for landscaping irrigation.

(MCSP, pp. 67-68.)

The wording throughout the MCSP needs to be revised to be enforceable. Policies that state “support,” should instead state “require;” “consider,” should be “utilize;” “encourage,” should be “prioritize” or “require.” These policies should be written to read as requirements, not as general suggestions.

9. The Planning Department must disclose the results of Tribal Authority Discussions.

AR-25 The PEIR concludes that implementation of the PEIR could adversely impact a tribal cultural resource. (PEIR, p. 6.5-8.) It notes that Native American consultation early in the project review process is a portion of the mitigation framework. (*Ibid.*) Before the PEIR can be fully evaluated it is necessary for the Planning Department to disclose whether such consultation has taken place and the results of such consultation.

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AR-26	<p>B. <u>The MCSP and PEIR Violate the Linda Vista Community Plan</u></p> <p>The Linda Vista Community Plan (LVCP), adopted in 1998 and currently in force, sets out the community's vision for Linda Vista. It provides, in pertinent part:</p>	
AR-27	<p>"The Linda Vista community will experience <u>moderate growth</u> over the next twenty years. Increases in residential density will occur primarily in <u>the central area of the community</u>. This increase will occur through the redevelopment of existing parcels rather than through the development of raw land. New residential development will be accompanied by <u>adequate parking</u> and landscaping, and by <u>commensurate improvements</u> in the community library, parks, roads and other public facilities." (LVCP, p. 11, emphasis added.)</p>	
AR-28	<p>Instead of the moderate growth envisioned by the LVCP, the MCSP includes high-density growth. Instead of residential density in the central area of Linda Vista, the MCSP places it at the extreme western end of the community. The MCSP fails to provide any assurances that financing will be provided for the community library, parks, roads or other public facilities, and the PEIR denigrates their need. Instead of allowing for adequate parking, the MCSP violates this promise by incorporating highly restricted parking under its TODF provisions.</p>	
AR-29		
AR-30	<p>The LVCP further promises "[s]cenic resources, such as the slopes above Mission Valley, views to and from the University of San Diego, and views <u>from the public streets to Mission Bay will be maintained</u>." (LVCP, p. 11, emphasis added.) The MCSP violates this promise by imposing heights that would impede views from the public streets to Mission Bay. This could be remedied by substantially reducing the building heights proposed by the plan.</p>	
	<p>II. <u>CHAPTER 2. ENVIRONMENTAL SETTING</u></p>	
AR-31	<p>A. <u>Historical and Tribal Cultural Resources, PEIR Section 2.3.5</u></p> <p>Morena Boulevard has recently been recognized by the City of San Diego as part of the route of Historic Highway 101, but there is no mention of this in the PEIR. Any construction and road realignment will have an impact on this historical feature of the Linda Vista community. There is nothing in the MCSP to address this potential loss of a significant cultural resource.</p>	
AR-32	<p>B. <u>Visual Resources and Scenic Vistas/Corridors</u></p> <p>The PEIR acknowledges that visual assets in the plan area includes its proximity to Mission Bay and other sites, but states that the public views towards these scenic resources are currently blocked by building. (PEIR, p. 2-27.) Public areas are those defined as open to all persons, maintained at the public expense and under public control. That would include roads and public rights of way. Any reasonable person traveling through the plan area can appreciate the views offered from the roads and public rights of way and notice that most, such as views of Mission Bay, are not blocked.</p>	
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C. Greenhouse Gas Emissions

AR-33

The PEIR catalogs the Greenhouse Gas Emissions (GHG) inventories of CARB and the City of San Diego. (PEIR, pp. 2-28 – 2-29.) In the Summary of Significant Environmental Impacts, Transport and Circulation, the PEIR acknowledges that implementation of the MCSP would increase GHG emissions over the existing land use. (PEIR, p. S-20.) It attempts to rationalize these GHG increases as a direct result of the implementation of the CAP strategies, claims it would be less than significant, and further asserts that that no mitigation is required. It then apparently claims the MCSP would ameliorate GHG emissions through transit-supportive development. (*Ibid.*)

AR-34

The PEIR is inadequate because it fails to address the increase in GHG emission resulting from the greater number of vehicles that the increased density will bring. In addition, with the proposed reduction in lanes on Morena Boulevard, there will be more idling of traffic and increases of GHG emissions. Even without the increased density, gridlock on Morena Boulevard is present during morning and evening rush hours due to the temporary closing of a southbound lane for trolley construction. We do not believe the increase in GHG emissions is less than significant, and further believe that it can be mitigated by providing for lesser density than set forth in the MCSP.

AR-35

Finally, the entire premise of the claim that transit-supportive development would be the panacea is not supported by any ridership study. True mitigation of GHG can be accomplished by lesser density than promoted by the MCSP.

D. Wildfire Hazards

AR-36

The danger of Wildfire Hazards is summarily addressed in Section 2.3.10.2 of the PEIR. It acknowledges that the plan area contains approximately six acres on the Very High Fire Hazard Severity Zone located at the southernmost boundary of the plan area adjacent to Friars Road, but ignores that this same condition exists just south of Tecolote Road in the Overlook Heights community. (PEIR, Figure 2-8 at p. 2-34.) For example, the PEIR acknowledges that areas of steep slopes, limited precipitation, and plenty of available vegetative fuel present wildfire risks. (PEIR, p. 2-33.) That statement describes the canyon area on the south side of Tecolote Road adjacent to Overlook Heights precisely. However, the PEIR dismisses the risk of Wildfire Hazards imposed by the MCSP at “Less than Significant.” (PEIR, p. S-22.)

AR-37

The PEIR is deficient because it fails to even discuss the impact of density on the roads necessary to evacuate Overlook Heights in the event of a Wildfire. Overlook Heights is a cul-de-sac community, surround by canyons and the University of San Diego on three sides. The only vehicular exit is via Morena Boulevard. The added density imposed by the MCSP impairs the vital need to evacuate an area that the California Department of Forestry and Fire describes Very High Fire Hazard Severity Zone and the 2018 fire season in California that shows the capacity of wildfires to jump from wildlands into residential areas.

<p>E. <u>Seismic Faults</u></p> <p>AR-38 Figure 2-14 shows there are least three major earthquake faults running under the Morena area. Under the MCSP, at least half the area would feature development in Geologic Hazard Category 31, "Liquefaction, High Potential-shallow groundwater, major drainage, hydraulic fills."</p> <p>AR-39 Instead of addressing these potential disasters, the PEIR concludes they are "Less than Significant" because new construction would be required to identify and address these hazards. (PEIR, pp. 8-24 -25.) The PEIR is inadequate because these challenges need to be addressed in the MCSP and the PEIR. Additionally, the Planning Department needs to provide the full fault zone studies.</p> <p>F. <u>Parks and Recreational Facilities</u></p> <p>AR-40 The PEIR acknowledges that the General Plan recommends a population based park of 2.8 acres for every 1,000 residents. (PEIR, p. 2-50.) The MCSP does not provide for parks to meet that requirement, and the PEIR is complicit by instead relying on existing parks. (PEIR, p. 2-51.) The PEIR does not address the demand for parks imposed by future population, where these parks would be built, when they would be built, or how they would be funded. It is simply inadequate.</p> <p>G. <u>Water Supply</u></p> <p>AR-41 The MCSP would increase the density of the plan area and the need to provide water. However, the PEIR simply states that the water lines that serve the area are "primarily cast iron, asbestos cement and polyvinyl chloride (PVC) . . . [and the PUD] "will upgrade/replace some of the older and undersized water lines in the Specific Plan area." (PEIR, p. 2-60.) Adding 6,000 dwelling units and not addressing the increased demand on water lines is, if not irresponsible, incomplete planning practice.</p> <p>AR-42 The PEIR is inadequate because it fails to state how these upgrades will be financed and how they would be phased in relation to construction in the Specific Plan area. The MCSP should be reconsidered to address these concerns.</p> <p>H. <u>Wastewater</u></p> <p>AR-43 The PEIR describes the existing sewer system serving the Specific Plan area, but does not discuss the impact that a sharp increase in the area's population will have on those sewers. Instead, it states the "major trunk sewers have been studied to properly convey sewer flows from the proposed development." (PEIR, p. 2-62.)</p> <p>AR-44 The PEIR is inadequate because it fails to disclose the results of those studies, whether the existing sewer system is capable of dealing with the increased densities, and if not, how it is proposed to pay for replacement sewers. It mentions a new sewer pump station in the area as part of the Pure Water program (PEIR p. 2-64), but does not state that it has any relationship to</p> <p style="text-align: right;">Page 8 of 20</p>	
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the demands imposed on the sewer system due to increased density. Indeed, it states that there is no timeline or specified site for the pump. (*Ibid.*)

III. TRAFFIC, SECTION 6.2

A. The Data Used to Perform the Traffic Analysis Does Not Reflect Realistic Conditions.

AR-45 Table 5-1 in Appendix B of the PEIR, regarding trip generation, fails to disclose how the Preferred Plan and Base Year trip generation rates were derived. To be adequate, it would require information on how each of the land use trip rates were calculated. The trip generation rates are used as input data for traffic analysis. Several environmental impacts, such as air pollution and noise, depend on accurate results of the traffic analysis.

AR-46 Appendix P, an e-mail from traffic analysis consultants Chen Ryan Associates to Claudia Brizuela, City Traffic Engineer, states that trip generation rates were provided by the City of San Diego to SANDAG.

AR-47 The PEIR lacks transparency because the methods by which the trip generations rates were calculated are not provided in the document. What was provided does not inspire confidence. For example, Table 5-1, page 37 of Appendix B, states that multi-family high density total trips will increase over ten times (10X) with the preferred plan as compared to the existing conditions. This is indicative of the increase in the number of residents proposed by the plan, yet the number of fire and police stations trips remain unchanged between the preferred plan and the existing conditions. With about 6000 additional residential units to be added to the plan area, one would expect a concomitant number of fire and police stations trips.

AR-48 Another obvious inaccuracy is demonstrated by the Nursery Total Trips. The existing conditions total trips for the Armstrong Garden Center was determined to be 905 trips, but with the preferred plan the total trips was said to be zero. As the nursery only relocated to the north side of Tecolote Road, within the transportation analysis zone, one would expect the preferred plan nursery trips to be at least 905 trips.

AR-49 If one were to scale the fire and police station trips and the nursery trips by the proposed increased in multi-family high density trips (10X), there would be 10,160 fire and police stations trips, not 1,016, and 9,050 nursery trips instead of 905. Adjusting the total change in trips for with considering just the inaccuracies cited above discloses the following:

Increases in trips from base year to preferred plan	22,528
Additional Fire and Police station trips	9,144
Additional Nursery Trips	8,145
TOTAL ADDITIONAL TRIPS	39,817

This is a 77% increase in forecasted trips generated by the plan. There are 48 designated land use trip counts that need to be thoroughly reviewed in order to determine the true impact of the MCSP.

B. The Traffic Analysis Fails to Account for the Cumulative Impacts of the Proposed Riverwalk Development.

AR-50

The Daily Traffic Volumes and the Levels of Service (LOS) for Linda Vista Road between Napa Street and Marian Way are essentially identical under the existing conditions and the preferred plans. (PEIR, Appendix B, Figure 3-2, p. 14 and p. 43.) Similarly, the Friars Road segment between Napa Street and Colusa Street shows an actual decrease in Daily Traffic Volume, from 19,550 trips to 16,900 trips.

However, the Riverwalk development proposes approximately 4,300 dwelling units that would utilize Friars Road. The failure to consider the cumulative impacts of these additional units is a major inadequacy of the PEIR.

C. The PEIR Fails to Account for the Number of Vehicular Trips Generated by Each Additional Unit in the Project Area under the MCSP.

AR-51

At the August 28, 2018 meeting of the Ad Hoc Committee of the Linda Vista Planning Group on the Morena Corridor Specific Plan, Claudia Brizuela, traffic engineer for the City of San Diego, stated: "We are not assuming that every [residential] unit is a vehicular trip." The PEIR fails to account for the number of vehicular trips generated by each unit. It fails to disclose how many occupants per unit were included in the traffic analysis and how many cars were assumed to be owned by each of these occupants.

AR-52

The project is described as attractive to Millennials. According to a CNBC article, nearly 80% of Millennials own cars and 75% of those who do not, aspire to own one. (Accel + Qualtrics Millennial Study, 2017.) Additionally, the 2016 Demographics study conducted by the San Diego Health and Human Services Agency showed that in the region that includes the plan area, 75.9% drove alone to work, 7.9% carpooled, and only 2.7% used public transportation.

AR-53

While we recognize the aspirational objectives of the MCSP regarding use of public transportation, the PEIR must determine whether the forecast of vehicular trips is realistic. Until that is done, the PEIR must be deemed inadequate.

D. The PEIR Fails to Provide Feasible Plans to Implement the Mobility Improvements Needed for the Proposed Project.

AR-54

The timing and phasing of the infrastructure updates outlined in the MCSP is critical. Michael Prinz of the Planning Department has indicated to the Ad Hoc Committee that eminent domain will not be used to procure the property needed to implement the mobility improvements outlined in the MCSP.

AR-55

The Impact Analysis outline in section 6.2.3 of the PEIR is flawed because it "assumes all of the transportation improvements described in Table 3-2 are implemented." (PEIR, p. 6.2-7.) However, the vast majority of the improvements in that table are infeasible because they require funding that has not been provided, and/or property procurement that require either eminent domain or willing sellers.

AR-56 Table 6.2-4 compares the existing and proposed project Level of Service results. It shows the number of unacceptable Level of Service freeway segments (i.e., LOS worse than D) in the morning stays the same at two, but six freeway segments degrade by one Level of Service, and four of them degrade from C to D. (PEIR, p. 6-2-15.) This does not even account for the inaccurate forecasted traffic volume, as described in subsection (A) above. Indeed, the actual number of additional unacceptable Level of Service freeway segments may be significantly higher.

AR-57 According to the same table, in the evening the number of unacceptable Level of Service (worse than LOS D) freeway segments increases from two to six. In addition, ten segments degrade by one Level of Service, five of which degrade from LOS C to LOS D. (PEIR, p. 6-2-15.) Again, due to the inaccurate and underestimated traffic volume forecasts set forth above, the actual number of unacceptable and degraded Level of Service freeway segments may be quite higher.

AR-58 The PEIR fails to provide feasible mitigation measures to reduce or eliminate these impacts, asserting instead that freeway improvements are not under the authority of the city. Improvements have been identified within the SANDAG Regional Plan, but when the improvements will be implemented and the effectiveness of the improvements is undetermined. The unavoidable significant impacts to these freeway segments imposed under the MCSP will exact a large toll not only on the residents of the plan area and the adjacent areas, but on everyone traveling on these freeways.

AR-59 The PEIR is faulty because there are available mitigation measures that would reduce the adverse impacts. The mitigation measure is to recommend a reduction in the proposed density in the project area.

E. The PEIR Fails to Provide Sufficient Mitigation Measures to Reduce or Eliminate the Impacts that will be Generated by the MCSP.

AR-60 The PEIR references three roadway segments and four intersections where mitigation measures could potentially reduce significant impacts. These include

- 6.2-1 Segment on Clairemont Drive from I-5 n/b ramp to Denver Street;
- 6.2-2 Segment on Denver Street from Clairemont Drive to Ingulf Street;
- 6.2-3 Segment on Morena Boulevard south of Linda Vista Road;
- 6.2-5 Intersection of Denver Street and Clairemont Drive.

The PEIR does not propose any mitigation measures for these segments as part of the MCSP. (PEIR, p. 6.2-23.)

The PEIR states that while implementation of the improvements it identifies would reduce impacts to less than significant, no mitigations are included in the MCSP and Impact Fee Study (IFS) for 6.2.1 through 6.2-3 and 6.2-5 because no funding mechanism exists for them and the mitigation measures would be inconsistent with the mobility goals. (PEIR, p. 6.2.24.)

AR-61

The PEIR fails to provide sufficient justification for the proposition that the mitigation measures identified are infeasible and inconsistent with the mobility goals. Further study is required to provide cost estimates for each of the proposed improvements and to clearly explain how there are no funding mechanisms available through city, state and federal funding options. All the identified mitigation measures should be included within a revised MCSP and Impact Fee Study as a project design feature rather than a proposed mitigation measure. If the Planning Department continues to assert the mitigation is financially infeasible, the proposed project densities and height limits should be reduced to limit the transportation impacts.

IV. NOISE, SECTION 6.3

AR-62

The MCSP would increase the amount of density permitted “by right,” without regard to the TOD process. Such projects would be ministerial and the PEIR admits there is no procedure to ensure that exterior noise resulting from increased vehicular traffic would be adequately attenuated. It states that implementation of the Specific Plan would result in changes to the land uses resulting in the introduction of new noise-sensitive land uses in the form of increased residential uses that would be potentially significant. (PEIR, p. 6.317.)

It makes a finding that a “significant impact related to exterior noise levels would occur for ministerial projects exposed to vehicular traffic noise levels in excess of the land use and noise compatibility levels established in the General Plan Noise Element. . . .” (*Ibid.*)

AR-63

The PEIR finds these impacts to be “Significant and Unavoidable,” but identifies no mitigation measures. (PEIR, p. S-10.) There is mitigation in the form of lesser density imposing lesser noise impacts. The PEIR is deficient for failing to consider this mitigation.

V. AIR QUALITY, SECTION 6.4

AR-64

The PEIR, in discussing air quality, analyzes as Issue 1 whether the MCSP conflicts with or obstructs implementation of air quality plans, particularly in relation to the concerns of the Regional Air Quality Strategy (RAQS) about reactive organic gas (ROG) and oxides of nitrogen (NO_x), a precursor in the formation of Ozone. (PEIR, p. 6.4-3.) It concludes the MCSP would conflict with implementation of the RAQS, resulting in a potentially significant impact on air quality. (PEIR, p. 6.4-4.)

AR-65

NO_x is a highly reactive gas that is a major contributor to two other air pollutants, particulate matter and ozone. These are among the most regulated air pollutants in the United States and California due to the large impacts these pollutants have on public health and the environment. NO_x and particulate matter have been found by scientific studies to reduce lung function and exacerbate the symptom of asthma. Ozone is the prime precursor to smog. Environmental Protection Agency analyses have found that short term exposure to ozone induced or was associated with statistically significant declines in lung function. It increases emergency room visits, hospital admissions for respiratory conditions, and is a likely cause of a range of other health and mortality issues. EPA analysis of ozone in 2013 found strong evidence that ozone concentrations impair many native plants and trees.

AR-66 The PEIR acknowledges that such future toxic air emissions associated with the build-out of land uses within the Specific Plan area would be greater than anticipated emission under the adopted community plan. Rather than trying to prevent the resulting ill-health and premature deaths the MCSP would cause, the PEIR's solution is to call for changing the RAQS to permit the increase in toxic emissions! (PEIR, p. 6.4-14.)

AR-67 This lowering of the bar for air toxics is unacceptable. The MCSP must be re-worked to assure compliance with air quality standards.

VI. VISUAL EFFECTS AND NEIGHBORHOOD CHARACTER, SECTION 6.7

A. Scenic Views

AR-68 At page 6.7-3, the PEIR acknowledges that under the TOD process, buildings in excess of 45 feet would be allowed at both stations with the approval of a Planned Development Permit (PDP). The approval would allow 100- and 65-foot buildings, which "could have the potential to obstruct views of the Mission Bay and the Pacific Ocean, which are identified in the Linda Vista Community Plan." (PEIR, p. 6.7-3.)

AR-69 The impact of these approvals is understated because building heights in excess of 45-feet would obstruct views. Indeed, the PEIR correctly concludes the impacts related to scenic views and vistas are significant and unavoidable. (PEIR, p. 6.7-8.) However, rather than proposing meaningful mitigation, the PEIR baldly states (but does not specify where) that the MCSP identifies a robust policy framework to address potential adverse effects related to scenic vistas and views. (PEIR, p. 6.7-8.)

AR-70 The PEIR should provide a list of the policies in the proposed plan that requires development to reduce its effects on the existing scenic views. It appears the MCSP seeks to substantially change the existing land use character, without any proposed policies intended to preserve views. The appropriate mitigation is not to permit such high-rise development. This mandates either an entire rewrite of the MCSP or at least adoption of the so-called Low Density alternative.

B. Neighborhood Character

AR-71 The PEIR finds that implementation of the MCSP, and particular the TOD program, has the potential to change the neighborhood character that exists in the Linda Vista portion of the plan area. (PEIR, p. 6.7-3.) It notes that these would involve increased bulk, scale, and height of buildings, and that it cannot be known with certainty whether it can be fully mitigated. (PEIR, pp. 6.7-4 – 6.7-5.)

AR-72 We agree that these are significant impacts and doubt that as the MCSP is currently written they can be mitigated. However, a reduction in the heights and densities in the MCSP would ensure that the significant impacts of development under the TOD program will be substantially mitigated while still assisting in the implementation of the Climate Action Plan. Please see the discussion of alternatives in this Comment letter.

VII. GREENHOUSE GAS EMISSIONS, SECTION 6.8

- AR-73 The PEIR posits that under the MCSP, Greenhouse Gas Emissions (GHG) would increase over those in the current plan from 90,328 metric tons annually to 108,468 metric tons annually, an increase of 20% in GHG. (PEIR, p. 6.8-5, Table 6.8.2.) It acknowledges the GHG emissions increase is due to the increased density of development that would be allowed within the Linda Vista portion of the MCSP. (PEIR, p. 6.8.5.) Even while admitting the increase in GHG emissions would amount to 20%, it finds that amount to be “less than significant.” (PEIR, p. 6.8-9.) That is an incredible statement.
- AR-74 The increase in GHG emission is likely understated. To reach the 20% in emissions increase, the PEIR relies on an assumed reduction of automobile GHG emissions of 5,054 metric tons annually. In turn, this is based on the unsupported assumption that those living adjacent to the trolley stations AND those living within a one-half mile of those stations will shift to trolley ridership. As noted in this Comment letter, *ad nauseam*, there is no ridership study to support this claim.
- AR-75 The calculation of GHG emissions under the MCSP also appears to be partially based on new construction in the Specific lan area being required to include all mandatory green building measures. (PEIR 6.8-7.) However, as set forth more fully in the discussion of section 6.9, suggestions are not requirement. Specifically, the MCSP:
- Encourages, rather than requires, the installation of solar energy generation systems (Policy 4.6.3);
- Encourages, rather than requires, the implementation of wind energy generation systems (Policy 4.6.4);
- Encourages, rather than requires, the adaptive reuse of existing buildings in conjunction with improvements to increase energy efficiency and building longevity (Policy 4.6.5).
- (MCSP, p. 67; PEIR, p. 6.9-4.)
- Moreover, the MCSP encourages, rather than requires, adherence to LEED standards for construction, and encourages, rather than requires, implementation of energy and water efficient measures for commercial use. (MCSP, p. 74.)
- Thus, even the projected increase in GHG emissions is likely understated because the PEIR seemingly relies upon the implementation of construction standards that are not mandatory, according to the MCSP.
- AR-76 As previously stated, we do not believe the increase in GHG emissions is less than significant, and we further believe that it can be mitigated by providing for lesser density than set forth in the MCSP. We further believe the MCSP should require, rather than encourage, the environmental policies set forth in it.

VIII. ENERGY, SECTION 6.9**A. Transportation Energy Use**

AR-77

The PEIR projects that the MCSP would generate significantly more Average Daily Trips (ADTs) than the current land use does. It finds that currently the plan area generates 93,602 ADTs and this would go to 116,130 under the plan, an increase of 22,525. (PEIR, p. 6.2-2.) It justifies this increase on the basis that convenient access to the trolley and bus lines, as well as proximity of homes to service, combined with proposed (albeit unlikely, see Section III, D, above) mobility improvement would increase opportunities for non-single-occupancy vehicle travel. (PEIR, p. 6.9.3.)

AR-78

The PEIR is inadequate because this rationalization is unsupported by factual, objective studies to demonstrate the validity of its conclusion that a sufficient number of residents or workers in the Specific Plan area will abandon daily use of their vehicles for mass transit and bikes to mitigate the significant negative energy effects of the high density on energy uses. The PEIR must be revised to provide for a trolley ridership study to show that current San Diego residents of high-rise/high density developments in fact regularly use these alternative means of transportation in significant numbers to justify the tremendous increases in transportation energy uses.

AR-79

Although it lacks the height and density of what would be built under the MCSP, it seems feasible to perform a ridership study on mass transit use by the residents of the Morena Village project at Napa and Linda Vista Road. The Ad Hoc Committee has been requesting such a study virtually since its inception, to no avail. Instead, the Planning Department has ploughed through the project approval process without any concern as to whether its assumptions are valid.

B. Building Energy Use

AR-80

The PEIR utilizes the California Emissions Estimator Mode to estimate residential and non-residential energy uses under the MCSP. The PEIR anticipates that any development will comply with all current building codes, regulations, and requirements. Nonetheless, there is a significant increase in energy use under the MCSP. (PEIR, p. 6.9-3 and Table 6.9-1, therein.) The PEIR and the underlying MCSP suggest several design policies that support energy-efficient building designs. (PEIR, p. 6.9-4; MCSP, pp. 67-68, 74.)

AR-81

However, suggestions are not requirements, and only “encourage” compliance with the design policies. For example, Policy 4.6.11 encourages the use of graywater reuse systems for landscape irrigation to supplement potable water supplies. Instead, the MCSP should require the use of graywater reuse systems. The development of an area with new buildings is a perfect opportunity to implement well-accepted energy and water-saving policies. Once a building is completed it is much more difficult to retrofit it to use graywater.

AR-82

Accordingly, this emphasis on “encourage” and similar non-mandatory terms shows the inadequacy of the PEIR and the MCSP. Both documents need to be reconsidered to state clear requirements.

IX. HEALTH AND SAFETY, SECTION 6.10

AR-83

Section 6.10 discusses the health and safety impacts that could result from the implementation of the MCSP. It raises, as Issue 4, Hazardous Materials Sites and Health Hazards. (PEIR, p. 6.10-5.) The PEIR notes that development of sites with existing contamination in accordance with the MCSP could potentially pose a hazard to the public or the environment. (*Ibid.*) It concludes that while there are no policies in the MCSP relative to hazardous materials, the general plan includes policies to protect the health, safety and welfare of residents relating to hazardous materials. (PEIR, p. 6-10.2.)

This is not adequate. The California Department of Toxic Substances Control in a Notice of Preparation letter dated October 17, 2016 expressed concern about the project area, stating:

“Based on DTSC's EnviroStor database, investigations were conducted previously at the project site. Chlorinated compounds were detected in groundwater and soil vapor. DTSC has no record indicating that the extent of the contaminated plumes were completely defined.

* * * * *

“DTSC is uncertain whether the investigation and the preliminary report were conducted under oversight of any State or local agencies. As a result, DTSC recommends that the EIR should:

- “1) Identify and determine whether current or historic uses at the project site may have resulted in any release of hazardous wastes/substances.
- 2) Identify any known or potentially contaminated sites within the proposed project area. For all identified sites, the EIR should evaluate whether conditions at the site may pose a threat to human health or the environment.
- 3) Identify all investigations and remediation conducted at the site. DTSC's EnviroStor database indicates that chlorinated compounds have been detected in soil vapor and groundwater beneath the project site.
- 4) Include an updated risk assessment using currently approved screening levels.”

(PEIR, Appendix A.)

A policy must be added to the MCSP related to the presence of these materials. Moreover, the PEIR should be revised as recommended by the Department of Toxic Substances Control to ensure public safety in future developments.

X. PUBLIC SERVICES AND FACILITIES, SECTION 6.13

AR-84

Section 6.13.2 begins by noting that public services and facilities impacts could occur if implementation of the Specific Plan promotes growth patterns which could cause significant environmental impacts in order to maintain service ratios, response times or other performance objectives. (PEIR, p. 6-13-1.) It then outlines concerns about police protection, parks and recreations, fire/life safety protection and libraries. (PEIR, pp. 6.13-2- 6.13-6.)

In concluding however, it states:

“Regarding police protection, the proposed Specific Plan does not include the construction of new police facilities”;

“Regarding parks and recreation facilities, there is an existing and projected deficit in population based parks which is an adverse impact but not considered significant at the program level.”;

“Regarding fire/life safety protection, implementation of the proposed project would result in an increase in overall population which could result in a change in fire-rescue response times. The Citywide study does not identify a need for a new or expanded facility within the Specific Plan communities and the Specific Plan does not propose any new fire station or fire station expansion”;

“No new or expanded libraries are planned at this time, and the Specific Plan does not propose the construction of library facilities.”

(PEIR, pp. 6.13-7 – 6.13-8, emphasis added.) Without support, it asserts that impacts to police protection, parks and recreation facilities, fire/life safety protection and library services are “less than significant,” so no mitigation is required. (PEIR, p. 6.13-8.)

AR-85 This is precisely the type of error criticized earlier in these Comments, namely that in-fill development can be completed without assuming the costs for the infrastructure needs it creates. AR-86 As also noted earlier, the MCSP does not provide for infrastructure. The PEIR makes an illusory promise that a comprehensive Impact Fee Study will be updated for the Linda Vista community planning area after the adoption of the MCSP to include fees for police facilities funding. (PEIR, p. 6-13.2.) Similarly, it promises that after adoption of the MCSP, a comprehensive Impact Fee Study will be completed to define applicable development impact fees for park funding. But it adds that these “fees would not be adequate to address the extent of the parkland deficit.” (PEIR, p. 6.13-3.)

AR-87 This is not adequate. The MCSP proposes to increase residential density in an area currently lacking recreational facilities, and without any assurance the funding for future recreational facilities will be available. The increase in population will increase the demands on public services and exacerbate the current deficiencies. Contrary to what the self-justifying PEIR asserts, this is a significant impact and policies should be added to ensure infrastructure in the Linda Vista Community Plan area to address the proposed increases in population. Additionally, the Planning Department needs to provide a list of approved immediate infrastructure improvements that will be provided in the plan area.

XI. CHAPTER 10, INADEQUATE ANALYSIS OF ALTERNATIVES

AR-88 In Chapter 10, the PEIR purports to analyze alternatives to the MCSP. The analysis is inadequate because rather than presenting objectively, it advocates for the high-rise/high density presupposition of the Planning Department and the developers who would benefit from it.

Page 17 of 20

AR-85 through AR-87

Please refer to response AQ-85 as these are duplicate comments.

AR-88 through AR-89

Please refer to response AQ-86 as these are duplicate comments.

AR-89

A. The Alternatives Analysis is Insufficient and Undermined by Presumptive Logic.

The analysis of alternatives to the MCSP states that among the primary goals, recommendations, and objectives of the MCSP are (1) to promote high residential density and employment opportunities and (2) to leverage regional transit investment to provide critically needed housing by designating high-density residential development. (PEIR, pp. 10-1 - 10-2.) It then concludes that these objectives can be accomplished by adopting the MCSP or its preferred alternative. Essentially, it says high density development can only be accomplished by high density development. This is a tautology. It is inadequate because it does not begin by questioning the presumption that these are desirable objectives, and if desirable, whether their benefits can be achieved by means other than the MCSP or its variants. For example, mixed-use development can be attained with lesser density than the MCSP imposes, as can be seen from the Morena station project at Napa and Linda Vista Road.

AR-90

B. The Analysis for No Project/Adopted Alternative Analysis is Not Adequate.

Page 10-4 begins the analysis of the No Project alternative. It states, without substantiation, that there would not be any mobility improvements within the specific plan area. The PEIR must explain why road improvements would not occur absent high density development.

AR-91

The need for such explanation is intensified by the Analysis stating the same mobility improvements would be accomplished with lower density than is provided in the MCSP. (See PEIR, p. 10-21, subsection f.)

AR-92

C. The Analysis for the "Mid Density" Land Use Plan Alternative is Inadequate.

Page 10-11 begins the discussion of the so-called "Mid-Density" alternative. This is a misnomer because this alternative would retain the building heights of 100 and 65 feet for the Tecolote Village and Morena Station District, respectively, and also include the TODE provisions to justify unreasonably low off-street parking requirements.

AR-93

This alternative should properly be described as the "High Rise/Density" alternative. While it would lower the density requirements at the two stations to 73 and 54 units to the acre, respectively, it fails to explain why this reduced density still requires the high rise construction of 100 and 65 feet of the MCSP. It is reasonable to believe that fewer units would mean less height. However, this alternative does not explain why reduced density still requires the same excessive building heights. The PEIR should reconcile this inconsistency.

AR-94

This is a major concern because, as set forth at page 10-21, the analysis admits this alternative would retain the "same significant and unavoidable impacts related to scenic vistas and views and neighborhood character" as the MCSP. Accordingly, the PEIR must be reconsidered to analyze how the reduced density proposed by this alternative could be accommodated by lower rise buildings, what the height of those buildings would be, and the impacts of those lower rise buildings.

AR-90 through AR-91

Please refer to responses AQ-87 and AQ-88 as these are duplicate comments.

AR-92 through AR-94

Please refer to response AQ-89 as these are duplicate comments.

<p>AR-95 D. <u>The “Low Density” Alternative is a Basis for Negotiations.</u></p> <p>Starting at page 10-22, the PEIR begins the discussion of the so called “Low Density” alternative. Under this alternative density would nearly double, from 29 units to the acre to 54 at both sites, and the height limit by right would increase by 50%, to 45 feet. That is not low density and properly should be called mid-density³. These comments will, nevertheless, use the term “Low Density” for purposes of consistency.</p> <p>AR-96 This alternative could generate up to 3,780 additional dwelling units, would result in less traffic overall, and would avoid a significant impact along one segment associated with the MCSP. (PEIR, p. 10-22.) In addition, the reduced number of trip generations under this alternative would mean fewer GHG emissions than under the MCSP. (PEIR, p. 10-24.) This alternative supports increased density near the transit stations and would be consistent with CAP goals. (PEIR, p. 10-25.)</p> <p>AR-97 The “Low Density” alternative is worthy of further environmental analysis as to traffic, funding of increased infrastructure to meet the burdens it would impose, and affordable housing. Because of the lower heights of buildings, building costs per unit should be less, allowing for greater affordability of housing.</p> <p>E. <u>The Alleged “Environmentally Superior Alternative” is Neither Superior nor Desirable.</u></p> <p>AR-98 At page 10-25 the PEIR concludes that the Environmentally Superior alternative is the high-rise/high density option. It is not, because the amount of density it would impose on the community is not acceptable, the inadequate off-street parking requirements are not reasonable, and the visual blight and the change to the character of the community are contrary to the community’s interests and concerns. Both this alternative and the MCSP should be rejected.</p> <p>AR-99 XII. THE MCSP DOES NOT HELP SOLVE SAN DIEGO’S AFFORDABLE HOUSING NEEDS.</p> <p>There is no section in the PEIR that addresses affordable housing. Perhaps this is so because the MCSP does not provide for affordable housing.</p> <p>AR-100 We need teachers, firefighters, nurses and police officers in San Diego, but they are being priced out of housing. This plan area is close to the center of San Diego and provides access to public transportation, yet neither the MCSP nor the PEIR even mention affordable housing. This is a conspicuous and critical shortcoming.</p> <p>AR-101 Linda Vista has long been a working-class neighborhood. The MCSP proposes to gentrify it with high-rise/high-cost housing. This is a matter of equity and social justice. The MCSP must be reformed to address this gaping inadequacy.</p> <p>³ By way of comparison, density at the current Morena Station District is just under 29 units to the acre.</p> <p>Page 19 of 20</p>	<p>AR-95 through AR-98</p> <p>Please refer to responses AQ-90 through AQ-93 as these are duplicate comments.</p> <p>AR-99 through AR-101</p> <p>Please refer to response AQ-94 as these are duplicate comments.</p>
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LETTER

RESPONSE

CONCLUSION

AR-102

Our community understands that land in the Morena Corridor is being under-utilized. We believe that road re-alignment, some increased residential density, affordable housing, mixed use, and provisions to fund the supporting infrastructure are necessary. The "Low Density" alternative is a basis to begin the discussion and the analysis of a specific plan update for this area.

The Planning Department has spent years and valuable resources to draft a plan that is broadly objectionable to Linda Vista. The department has further frustrated the process by funding a PEIR to justify that plan and that lacks sufficient, transparent, and objective analysis. The community has offered input that has been largely ignored. It is time now for the Planning Department to engage in meaningful dialogue with the community. Together, we can seek to effect reasonable changes that accurately reflect what the planning area can accommodate and that support its current and future residents.

Sincerely,

Howard Wayne
Chair
Ad Hoc Committee on Morena Corridor Specific Plan

Page 20 of 20

AR-102 Please refer to AQ-95 as this is a duplicate comment.

Letter AS

Cris Medrano-Huffer
PO Box 83434
San Diego, Ca. 92138

September 28, 2018

Rebecca Malone
Environmental Planner, City of San Diego Planning Dept.
9485 Aero Dr., MS 413
San Diego, Ca. 92123
re: Morena Corridor Specific Plan + Number (582608/SLH NO
2016101021

Dear Ms. Malone:

AS-1

I believe public need + utility are equally or more important than aesthetics. They are not mutually exclusive, they can work together.

Population growth is inevitable especially here in San Diego. With housing being a crisis here, we need equitable solutions that serve the needs of City Planners + Management, while maintaining quality of life. Being idle is not a solution!

New development is by no means an automatic eye sore or impediment on quality of life issues. Even a parking lot can become a smartly and beautiful architectural statement. Just look at the Mission Valley Library parking lot!

I can't wait to cross the street to take the trolley to UCSD and to hopefully go to the grocery store.

I am a second generation family member living in the same home on DORCAS ST., SAN DIEGO, CA 92110 for 68 years and I'm all for progress. Go for it!

Thank-you,

Cris Medrano-Huffer
(619) 977-7140

AS-1

All public comments will be provided to decision makers for consideration. This comment does not suggest an inadequacy in the analysis of the PEIR.

LETTER

RESPONSE

LETTER	RESPONSE
<div data-bbox="201 170 903 246"> <p>From: Stephanie Pfaff To: PLN_PlanningCEQA Subject: PROJECT NAME: Morena Corridor Specific Plan PROJECT No.: 582608 / SCH No. 2016101021 Date: Saturday, September 29, 2018 10:42:41 AM</p> </div> <div data-bbox="850 142 1039 194" style="border: 1px solid black; padding: 5px; text-align: center;">Letter AT</div> <div data-bbox="100 272 1024 1047"> <p>AT-1 I am 100% opposed to the proposed density and height being considered for the Jeromes/Toys R Us site. Violating the 35 foot height limit will alter the community character and result in ill conceived stretches such as Riviera in Pacific Beach and Crown Point Dr. When buildings are allowed to exceed the height limit, the result is a wall of units that cuts the neighborhood off from the skyline and horizon. The entire area is compromised for the few residents (and short term vacation renters) that get to enjoy the views.</p> <p>AT-2 Everyone knows the speculative nature of real estate in San Diego. Many of the units built along Morena will be purchased by investors who will rent them out on Air BnB etc. This will do nothing to help housing affordability in San Diego.</p> <p>AT-3 The lack of parking being proposed for the number of units will ensure that Morena becomes the next Friars Rd. The changes to Morena Blvd have already resulted in cars choosing to drive through the residential streets of Bay Park rather than deal with the congestion on Morena. This diversion of traffic will only increase and move cars into a residential area that the Morena thoroughfare was designed to prevent.</p> <p>AT-4 The city needs to realize that the infill decisions being proposed are infuriating long time residents (of 30, 40 years). A very unfortunate result will be when these residents move away and rent out their desirable Bay Park homes for top dollar, again, doing nothing to alleviate the housing issue in San Diego. On my street alone, a single family home for 50 years was recently rented out to 4 adults. The house directly across the street was rented out to 5 adults. For \$5000/month. This is what Bay Park/Clairemont is turning into.</p> <p>AT-5 The Morena corridor has plenty of space that can be developed into lovely, affordable housing for young couples and families. Houses (not high-rises) that are built with that population in mind will fit in with Clairemont/Bay Park/Linda Vista's identity as a community of families, not urban hipsters and short term vacation unit dwellers.</p> <p>Please do not ruin our community.</p> <p>Stephanie Pfaff</p> </div>	<div data-bbox="1060 280 1995 998"> <p>AT-1 Section 4.4 of the Specific Plan addresses development design and includes policies to ensure development is sensitive to public views and massing. However, as discussed in the PEIR, Section 6.7.3 impacts related to views and neighborhood character were determined to be significant and unavoidable as a result of implementation of the Specific Plan.</p> <p>AT-2 Comment noted. This comment does not suggest an inadequacy in the analysis of the PEIR.</p> <p>AT-3 As detailed in Chapter 3.0 of the PEIR, new and improved parking is designated throughout the Specific Plan area and the Specific Plan includes policies to promote structured and shared parking. For a discussion of traffic-related impacts, please see Section 6.2 of the PEIR.</p> <p>AT-4 Comment noted. Rental versus owner-occupied housing is not an issue that is required to be addressed under CEQA.</p> <p>AT-5 Concluding remarks are noted.</p> </div>

LETTER

RESPONSE

From: Gregory Yee
To: [PLN_Planning@CDOA](#)
Subject: Project Name: Morena Corridor Specific Plan Project#582608/SCHNo.2016101021
Date: Saturday, September 29, 2018 3:50:03 PM

Letter AU

Dear Ms. Malone and San Diego City Council:

This email is in response to the PEIR for the Morena Corridor Specific Plan. My name is Gregory Yee and I have lived in the Overlook Heights neighborhood for more than 50 years. I have no objections to the 30 to 45 foot height limits and mix use design of the new Tecolote Trolley station and buildings along the Morena Corridor. I do object to anything over 45 feet height limit for the following reasons: higher buildings would look out of place here and make a wall between our neighborhood and the coast, think of Miami Beach and all of the high rises along their beaches. The higher buildings would mean increase density which would increase traffic, parking and steer stalled traffic into residential streets and decrease property values. There needs to be better traffic flow and patterns to handle the increase in population and cars, which would mean widening streets and the taking of private property.

I ask that you look at past projects and how they are being used today and how they affect the neighborhoods presently. For example, the Napa Trolley station does not have adequate parking for it's mix use residence, retail tenants, and customers. I use to go to North Park, Hill Crest and Little Italy with my parents for family outings and dinners, but I do not take my daughter there now because parking is so difficult. Try parking at the Old Town Transit Station to take the trolley downtown. I am all for mass transit and new residences along the transit routes but the reality is who will be the tenants of these new apartments? They will be students of the University of San Diego, whose parent's can afford to rent a brand new apartment near the school or they will be students rooming together so they can afford the rent. How many university students do you know that do not own a car, which would mean more than one car per apartment. In the real world right now, we live about two miles from the School of Madeleine where my daughter goes to school. I drive thru the intersection of Knoxville & Morena Blvd. at least twice a day. Now there is congestion and left turn traffic at this corner and Dorcas & Morena and Buenos & Morena. Dorcas and Knoxville has not even been opened up to West Morena yet! Just imagine when these streets are opened up and widen when the Tecolote Trolley station is up and running. How will you handle the volume of traffic trying to get on SeaWorld Drive and Interstate 5? Have you seen the traffic during rush hour? South bound Morena is backed up from Buenos St. to Taylor St. in Old Town. Another issue which was not brought up in your PEIR report was the noise of train and trolley horns. From where I live I can hear the horns at all hours day and night. How will these noise issues be address for the people living right next to the tracks? My understanding is that it takes years to apply and get "quiet zone permits" from all of the related agencies. Has someone started this process or even looked into it?

In the end the City Council and Planning Department will do what they will do. I am willing to accept the present Height Limits of 30-45 feet but no more. I hope that my daughter chooses to stay in San Diego and even in our little neighborhood of Bay Park, but if the quality of life becomes like a "Big City or Third World Country" with the stress and problems of pollution, traffic gridlock and disregard for individuals, then she might as well live in L.A.

Respectfully,
 Gregory Yee

Sent from my iPad

AU-1

AU-2

AU-3

AU-4

AU-5

AU-6

AU-7

AU-8

AU-9

AU-1 Comment noted. All comments will be provided to decision makers for consideration.

AU-2 As discussed in Section 6.7 of the PEIR, the increase in allowable densities and height within the Linda Vista portion of the Specific Plan area, specifically around the existing and planned transit stations within the Morena Station and Tecolote Village districts, could alter the existing neighborhood character of the area and result in an increase in the bulk of buildings compared to the existing condition, resulting in a change of neighborhood character and is identified as a significant impact.

AU-3 The Specific Plan includes a mobility chapter that identifies mobility goals and policies and proposed mobility network improvements. Proposed improvements involve the creation of roadway reconfigurations, extensions, and new roadways and intersections that would provide more direct routes and improved safety through increased visibility and incorporate enhanced bicycle and pedestrian facilities. For a discussion of traffic-related impacts, see Section 6.2 of the PEIR.

AU-4 Comment noted. This comment does not suggest an inadequacy in the analysis of the PEIR.

AU-5 Comment noted. This comment does not suggest an inadequacy in the analysis of the PEIR.

AU-6 The PEIR assessed traffic impacts associated with implementation of the Specific Plan (see Section 6.3 of the PEIR). An analysis of the existing transportation and circulation conditions within the Specific Plan area is documented in Section 6.2.1.

LETTER

RESPONSE

	<p>AU-7 The PEIR assessed traffic impacts associated with implementation of the Specific Plan (see Section 6.3 of the PEIR). It was determined that the project would have a significant impact to two freeway segments in the AM peak hour and six freeway segments during the PM peak hour. In addition, the PEIR determined that significant impacts to the I-5 Northbound On-Ramp/Clairemont Drive and I-5 Southbound On-Ramp/Sea World Drive/Tecolote Road would be significant and unavoidable.</p> <p>AU-8 As discussed in Section 6.3.3 of the PEIR, impacts associated with rail noise (i.e., railway noise results from trolley travel, horns, emergency signaling devices, and stationary bells at grade crossings) were assessed. It was determined that noise level impacts resulting from trolley and train operations would be less than significant, as future development occurring within the Specific Plan area, including ministerial projects, would be required to demonstrate compliance with the relevant interior noise standards through submission and approval of a Title 24 Compliance Report.</p> <p>AU-9 Comment noted; all comments will be provided to decision makers for consideration.</p>
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LETTER

RESPONSE

Letter AV

From: Eugenie Newton
To: [PLN_PlanningCEQA](#)
Subject: Morena Corridor Specific Plan Number 582608/SCHNo.2016101021
Date: Saturday, September 29, 2018 5:12:07 PM

Attention: Environmental Planner, San Diego City Planning Dept

- AV-1 The 30' building height limit must be maintained in ALL relevant sections of the Morena Corridor Specific Plan. Clairmont community residents have consistently and repeatedly asked for this in all plans related to the Morena Corridor since the project and changes came to our attention.
- AV-2 Changing the height limit will have a significant detrimental effect on the environment, community and quality of life of the people who live, work and visit this historic San Diego neighborhood.
- AV-3 Your agreement to maintain the height limits, not raise them, will be sincerely appreciated.

Eugenie Newton

- AV-1 Comment noted. This comment does not suggest an inadequacy in the analysis of the PEIR.
- AV-2 All anticipated environmental impacts required to be assessed under CEQA were assessed within the PEIR. Neighborhood character impacts were assessed in Section 6.7.3 of the PEIR, in which it was determined that implementation of the Specific Plan could result in a significant impact as a result of future development within the Linda Vista portion of the Specific Plan area due to increased heights and development intensity that could conflict with existing neighborhood character.
- AV-3 See response to comment AV-1.

LETTER

RESPONSE

Letter AW

From: sierra.trek@yahoo.com
To: [PLN_PlanningCEQA](#)
Subject: Project Name is "The Morena Corridor Specific Plan" PEIR Number (582608/SCH No. 2016101021)
Date: Sunday, September 30, 2018 12:18:23 AM

AW-1

My comments regarding the draft PEIR:

I have a concern regarding what the City states on page number 327.

"As land uses within the surrounding communities are developed, particularly the potential land use changes associated with the comprehensive update to the CLAIREMONT MESA COMMUNITY PLAN, ALLOWABLE DEVELOPMENT intensities and BUILDING HEIGHTS COULD be INCREASED, similar to the Linda Vista portion of the Specific Plan area. Considering the planned transit stop within the Clairemont Mesa portion of the Specific Plan area and the overall goal of the City to promote transit supportive densities within areas with high quality transit, IT IS LIKELY that ADDITIONAL DENSITY WILL be RECOMMENDED in this area that WOULD CONTRIBUTE to a cumulative impact related to scenic views and NEIGHBORHOOD CHARACTER. Typically, to achieve higher residential densities, ADDITIONAL HEIGHT ALLOWANCES ARE REQUIRED. These POTENTIAL LAND USE CHANGES within the SPECIFIC PLAN area AND within the BROADER CLAIREMONT MESA COMMUNITY PLAN WOULD RESULT in a cumulatively CONSIDERABLE IMPACT related to scenic views and NEIGHBORHOOD CHARACTER."

This, and all like statements, NEED to be REMOVED from the Morena Corridor Specific Plan PEIR.

This is the legal LOOPHOLE that "INVALIDATES" the promise of maintaining the 30 foot height limit, NOT ONLY in the Morena Corridor BUT THROUGHOUT the ENTIRE CLAIREMONT MESA COMMUNITY PLAN AREA!

AW-2

The "Morena Blvd Station Area Specific Plan AD HOC SUB COMMITTEE" who has diligently met the last 3 years, needs the "LAND USE" RETURNED to them!
 This committee NEEDS to FINISH the JOB that they began, and HONOR THIS COMMUNITY'S GOALS.

Thank you.
 Carol Schleisman

Sent from my iPhone

AW-1

The language that is included in this cumulative impact discussion for visual effects and neighborhood character accurately reflects the potential for future projects within the Clairemont Mesa Community Plan area, along with future projects falling under the regulatory framework of the Specific Plan to result in cumulatively significant aesthetic impacts. No revisions to the PEIR are necessary.

AW-2

These concluding remarks are noted and do not raise an issue related to the adequacy of the analysis contained within the PEIR.

LETTER

RESPONSE

<div data-bbox="850 142 1039 194" data-label="Section-Header">Letter AX</div> <div data-bbox="193 191 1018 300" data-label="Text"> <p>From: Elke Stuart To: PLN PlanningCEQA; Councilmember Georgette Gomez; CouncilMember David Alvarez; Councilmember Scott Sherman; CouncilMember Chris Cate; Councilmember Mark Kersey; Councilmember Myrtle Cole; Councilmember Christopher Ward; CouncilMember Lorie Zapf; Councilmember Barbara Bry Subject: Morena Corridor Specific Plan #582608/ SCH No. 2016101021 Date: Sunday, September 30, 2018 3:25:38 PM</p> </div> <hr/> <div data-bbox="247 397 672 446" data-label="Text"> <p>From: Elke Stuart <elkescot@sbcglobal.net> Date: September 27, 2018 at 11:43:00 PM EDT</p> </div> <div data-bbox="247 470 856 495" data-label="Text"> <p>Subject: Morena corridor project #582608/ SCH No. 2016101021</p> </div> <p>Dear San Diego Planning Department and City Council Members,</p> <p>AX-1 My husband and I have lived in Bay Park for over 20 years. It is a special area of San Diego which, despite its central location in a large urban area, has managed to maintain it's laid back and relatively quite, single family residential neighborhood vibe. It is located next to natural habitats including the San Diego River, Tecolote Creek, Tecolote Canyon and Mission Bay.</p> <p>AX-2 The proposed Morena Corridor Project and the expansion of the trolley to the north and the UTC area of San Diego will change our area significantly. Because we know San Diego's growth impacts quality of life for all we ask that modest, reasonable and "fair to our community" growth occur in relation to the above referred project. High density options should not be considered as I am personally opposed to such an increase.</p> <p>Upon review of the draft PEIR report, I have noted significant issues and adverse effects this proposed project will have on all who live near or in the Morena/Linda Vista area, and our surrounding natural habitats.</p> <p>AX-3 A predominant, repetitive theme of the PEIR report states "no significant impacts were found and therefore no mitigation is necessary". This statement appears in most summaries and conclusion paragraphs, throughout the whole 433 page report.</p> <p>AX-4 These conclusions insult common sense and reality. The proposed addition of almost 6,000 new residential units with almost 14,000 more people (table 10-1 in the PEIR) will change the character of the neighborhood with increased automobile traffic. It will place significant demands on infrastructure (water, sewer, electrical grids, etc.), it will increase existing strains on current police and fire departments response times, it will negatively impact neighborhood quality of life, and it will <u>substantially</u> worsen air and noise pollution detrimental to natural habitats and residences alike.</p> <p>AX-5 Specific issues of concern to me would require significant modification to the</p>	<p>AX-1 Introductory comment noted.</p> <p>AX-2 Comment noted. All comments will be provided to decision makers for consideration.</p> <p>AX-3 Comment noted. The comment restates language used throughout the PEIR and does not raise an issue related to the adequacy of the analysis provided therein.</p> <p>AX-4 The PEIR assessed impacts associated with a change in character as well as traffic-related impacts. As discussed in Section 6.7 of the PEIR, the increase in allowable densities and height within the Linda Vista portion of the Specific Plan area, specifically around the existing and planned transit stations within the Morena Station and Tecolote Village districts could alter the existing neighborhood character of the area and result in an increase in the bulk of buildings compared to the existing condition. Additionally, future development under the TODEP could further alter neighborhood character due to increased heights and density compared to the existing condition. Impacts associated with a change in neighborhood character would be significant. As discussed in Section 6.14.3 of the PEIR, impacts to public utilities (storm drains, sewer and water distribution, communication systems) were determined to be less than significant. As discussed in Section 6.13.3, impacts regarding police protection, parks and recreation, fire and life safety protection, libraries, and school facilities were determined to be less than significant. As discussed in Section 6.4 of the PEIR, significant and unavoidable impacts were identified related to conflicts with the RAQS and State Implementation Plan, and impacts related to exceedance of air quality standards associated with build-out of the Specific Plan land uses. As discussed in the PEIR Section 6.3, significant and unavoidable impacts would occur as a result of vehicular noise, temporary construction noise, and construction vibration impacts.</p> <p>AX-5 The purpose of the PEIR is to provide disclosure of information to the public regarding potential impacts of a project. No changes to the PEIR are warranted.</p>

LETTER

RESPONSE

	existing Morena Corridor Plan and the initial PEIR report.		
AX-6	1.) Maintain current zoning heights of 30ft along Morena Blvd and 45ft limits in the Linda Vista area without exceptions! Taking zoning rights away from the Linda Vista community plan overlay group and rezoning silences community input into THIER neighborhood. I reject this proposal.	AX-6	Comment noted. This comment does not suggest an inadequacy in the analysis of the PEIR.
AX-7	The PEIR report identifies the project location in flood planes, along known fault lines and liquefaction zones which make high rise buildings dangerous and vulnerable in this earthquake prone area. These are major safety concerns.	AX-7	As discussed in Section 6.12 of the PEIR, future development within the Specific Plan would not have direct or indirect significant environmental impacts with respect to geologic hazards because future development would be required to occur in accordance with the SDMC and CBC. This regulatory framework includes a requirement for site-specific geologic investigations to identify potential geologic hazards or concerns that would need to be addressed during grading and/or construction of a specific development project. Adherence to the SDMC grading regulations and construction requirements and implementation of the recommendations and standards of the City's geotechnical study requirements would preclude significant impacts related to geologic hazards. Thus, impacts would be less than significant.
AX-8	Zoning changes and proposed "special exceptions" to current zoning height limits are only backdoor opportunities for developers to circumvent community input. They will buildout and maximize their profits leaving residents to deal with multiple negative impacts. For the last 3 years, residents of Bay Park and Linda Vista have continually and loudly voiced its' displeasure with proposed zoning changes for build outs of tall, multi family housing projects (In excess of 30ft.). This changes the character and density of our mostly single family housing neighborhood. It also steals our beautiful bay views, it changes wildlife habitat and migration, and it blocks the cooling effect the bay provides. This is primo real estate and developers can't wait to capitalize on it's location and views. They promise "affordable housing" in order to get permit shortcuts and cost savings all which is a guise. These units will not be "affordable" to most San Diegans. With average real estate values of \$800k+ in Bay Park, cramming large multi family housing units along Morena Blvd, is a way to make significant money. The city would benefit from increased property tax revenues from this change (Mid to high density housing) but it doesn't fully understand the substantial negative impacts and increased costs this expansion will also bring.	AX-8	All comments will be forwarded to decision makers for consideration. See response to comment AX-4. For a discussion of anticipated impacts associated with neighborhood character and scenic views and vistas, see Section 6.7 of the PEIR.
AX-9		AX-9	
AX-10	2.). Current infrastructure is not sufficient to handle proposed population increases in excess of 14,000 or 7,000 for that matter. Expensive and extensive improvements are required for sufficient, responsible, safe expansion. Upgrade responsibilities and secured funding should occur before or in conjunction with proposed expansion. These will be very expensive projects. Who will pay for these costs?		
AX-11	The subject area is one of the oldest in San Diego. It has an aged sewer, water, gas and electrical systems. Above power lines have been promised to be placed underground ever since we moved into the neighborhood in 1998, yet along Frankfort St. they have just grown in number and height. A trip down the street reveals old tilted wooden poles and sagging lines. No sidewalks exist in much of Bay Park and as a result families walk with their dogs and children in the streets. Spotty repairs and water upgrades have been made to just handle existing demands and will not handle additional, multi family housing demands. Not to mention water drainage shortfalls which have always been an issue along Morena Blvd. It will effect trolly access when it floods.		
AX-12			
AX-13	3.) Increased density and required trolley access (Bus drop off & parking lot traffic) will significantly and adversely increase traffic and noise pollution in		

LETTER

RESPONSE

	<p>AX-10 As discussed in Section 3.3.9 of the PEIR, the project includes adoption of an IFS for the Linda Vista community that addresses the need for public facilities associated with build-out of the Specific Plan. City Council adopted the current PFFP for Linda Vista in 2006. The existing PFFP sets forth the major public facilities needs in the areas of transportation (streets, sidewalks, storm drains, traffic signals, etc.), libraries, parks and recreation facilities, community centers, and fire stations that are needed to serve the community. The updated IFS for Linda Vista would incorporate identified facility improvements within the Linda Vista portion of the Specific Plan area, based on facility analysis completed as part of the Specific Plan. The IFS would include potential funding sources for public facilities financing, particularly development impact fees. Future improvements to be identified in the IFS would vary widely in their range and scope; some could be implemented incrementally as scheduled street maintenance occurs, and others would require significant capital funding from city, state, regional, and federal agencies, or are not feasible until significant new development occurs. Adoption of an IFS for the Clairemont Mesa portion of the Specific Plan area would occur concurrent with the comprehensive update to the Clairemont Mesa Community Plan, and is therefore not considered part of the project analyzed herein.</p> <p>AX-11 Comment noted. The comment does not raise an issue related to the adequacy of the PEIR analysis.</p> <p>AX-12 As discussed in Section 6.11.4 of the PEIR, all development occurring within the Specific Plan area would be subject to drainage and floodplain regulations in the San Diego Municipal Code (SDMC), and would be required to adhere to the City's Drainage Design Manual and Storm Water Standards Manual, thereby ensuring impacts associated with flooding would be less than significant.</p> <p>AX-13 For a discussion of anticipated traffic- and noise-related impacts, see Sections 6.2 and 6.3 of the PEIR, respectively.</p>
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LETTER

RESPONSE

<p>Bay Park, Clairemont, Linda Vista, Pacific Beach and west Mission Valley.</p> <p>AX-14 Even the PEIR report states that improvements to projected traffic problems do not have immediate mitigation plans. Specially it mentions improvement to the Interstate 5 on ramp at Tecolote/Seaworld scheduled for 2050 (pg. 254 of the PEIR)This is an unacceptable time frame! Traffic already backs up on the Balboa Ave. to the east and Clairemont Dr. on ramps to I-5 to the east. 14,000 new residents (approximately 6 times the existing resident count) will cause long delays in interstate on/off ramps and cause gridlock at multiple intersections. This will reroute large volumes of through traffic to our neighborhood. Additional residents will also create large demands for both on and off street parking. Safety of pedestrians, animals, cyclists and other motorists will be compromised. I don't think the city wants litigation costs associated with neglecting adequate traffic mitigation in the Morena Corridor Plan.</p> <p>AX-15 4.) Health hazards associated with increased air, water and noise pollution from burning additional fossil fuels, dirty run-off flowing into our inadequate storm drains, and new construction are eminent. Construction of a new water treatment facility is currently underway in the Linda Vista area which brings in untreated sewage. Is this a wise location to put a water treatment plant next to a river which drains into our Mission Bay and ultimately the Pacific Ocean? Air quality is already marginal with proximity to interstate 5 & 8. I ask if any of you personally would be happy with this predicament if you lived here? What of the wildlife and our unique eco system which includes a canyon, a river and a bay?</p> <p>I know this is a lengthy letter but there are serious, long term, adverse impacts for our community associated with high and medium density options of this proposal. Residents located in and near the Morena Corridor Plan simply want a reasonable, responsible and proportional growth plan. This community is being asked to carry an unfair proportion of solving San Diego's city wide water treatment, affordable housing and transportation shortfalls. We are willing to do our part to address these needs. However, careful consideration (including community input) with regards to height limits, traffic mitigation, appropriate infrastructure upgrades, pollution abatement, and regard for human & wildlife health & safety need to be exercised or I fear future litigation will occur.</p> <p>I sincerely appreciate your time with regards to addressing my shared concerns for this residential community, and, our greater San Diego community.</p> <p>Respectfully,</p> <p>Elke Stuart</p> <p>4428 Ashton St. San Diego, CA. 92110 (619)993-3718 elkescot@sbcglobal.net</p>	<p>AX-14 For a discussion of anticipated traffic-related impacts for vehicles, pedestrians, and bicyclists, see Section 6.2 of the PEIR.</p> <p>AX-15 Comment noted. The comment does not identify an inadequacy in the PEIR. For a discussion of anticipated air quality impacts, hydrology and water quality impacts, and noise pollution impacts, see Sections 6.4, 6.11, and 6.3 of the PEIR, respectively.</p>
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Letter AY

From: Mike Baker
To: [PLN_PlanningCEQA](#)
Subject: PROJECT NAME: Morena Corridor Specific Plan, PROJECT No.: 582608 / SCH No. 2016101021
Date: Sunday, September 30, 2018 6:26:28 PM

Section 2.3.5 Historical and Tribal Cultural Resources

AY-1

The city has acknowledged and accepted that Morena Bl is the route of historic Hwy 101. Yet the Summary of Significant Environmental Impacts P. S-16, makes no mention of this. It simply states that the plan will have a "Significant and Unavoidable" impact. Any construction and road realignment will have a negative effect of this historical feature of our community. What exactly is the city's plan to address this potential loss of a significant cultural resource to our community?

From: Mike Baker
To: [PLN_PlanningCEQA](#)
Subject: PROJECT NAME: Morena Corridor Specific Plan, PROJECT No.: 582608 / SCH No. 2016101021
Date: Sunday, September 30, 2018 6:27:18 PM

Section 2.3.7.3 Visual Resources

AY-2

The last sentence states, "Most of the public views towards scenic resources are blocked by residential, commercial, or industrial buildings". Since "Public" is defined as "Open to all persons, maintained at the public expense and under public control, and open to the view of all", in addition to parks it includes all roads and public rights of way. Any reasonable person traveling through the area will appreciate the views offered from the roads and public rights of way and notice that most are NOT blocked.

AY-1

The mitigation framework ensures that all future development projects with the potential to affect historic resources would undergo site-specific review as detailed in HIST 6.5-1. Mobility improvements identified for Morena Boulevard would not affect the historic significance of the road as it is already a modern road.

AY-2

Western looking views towards Mission Bay and the Pacific Ocean from Morena Boulevard and West Morena Boulevard within the Linda Vista portion of the Specific Plan area (from Tecolote Road south to Friars Road) are primarily blocked by larger development including, bulky public storage facilities and commercial and industrial buildings. Therefore, the PEIR accurately reflects the existing viewing potential within this part of the Specific Plan. Views toward the ocean do exist north of Tecolote Road; however, land use changes north of Tecolote Road are not proposed with this Specific Plan. Additionally, as redevelopment occurs south of Tecolote Road, the Specific Plan identifies policies to support incorporation of view corridors into development design.

LETTER

RESPONSE

From: Mike Baker
To: [PLN_PlanningCEQA](#)
Subject: PROJECT NAME: Morena Corridor Specific Plan, PROJECT No.: 582608 / SCH No. 2016101021
Date: Sunday, September 30, 2018 6:28:13 PM

2.3.8 Greenhouse Gas Emissions

- AY-3** In Table S-1 of the Summary of Significant Environmental Impacts, Transport and Circulation, the city acknowledges that the plan will have "Significant and Unavoidable" impacts on vehicular traffic and the air pollution they emit. (Air Quality 1st paragraph, P. S-14)The city proposes evaluating the situation six months "after" the certification of the final PEIR. Certify it today and evaluate it later?
- AY-4** Paragraph 3, P. S-15, states that no intersection would generate more than 31,600 vehicles per hour and that this would have a "Less than Significant" impact on pollution. Furthermore, Paragraph 1, P. S-20, states that there will be a "Less than Significant" impact on Greenhouse Gas Emissions.
- AY-5** Which is it? 1st, where is the traffic study, and 2nd, there is no mention of the effects of idling vehicles stuck in traffic vs vehicle traveling thru at the speed limit.
- AY-6**

- AY-3** The comment is referring to PEIR mitigation measure AQ 6.4-1 which requires: "Within six months of the certification of the Final Program Environmental Impact Report, the City shall provide a revised land use map for the Specific Plan area to San Diego Association of Governments (SANDAG) to ensure that any revisions to the population and employment projections used by the San Diego Air Pollution Control District (APCD) in updating the RAQS and the SIP will accurately reflect anticipated growth due to the proposed Specific Plan." This measure does not defer evaluation of air quality impact. Rather, this measure ensures that the updated land uses that are adopted with the Specific Plan are provided to SANDAG which will ensure that the next update to the RAQS are developed considering the increased density within Linda Vista. The City has assessed air quality impacts and included this discussion in Section 6.4.3 of the PEIR, under Issue 2.
- AY-4** This comment accurately restates language from the PEIR. It does not identify an inadequacy in the PEIR.
- AY-5** A Traffic Impact Analysis is included as Appendix B to the PEIR and was circulated for public review with the Draft PEIR.
- AY-6** An analysis of air quality impacts, including an analysis of air quality impacts associated with idling, can be found in Section 6.4.3 (Issue 3: Sensitive Receptors) of the PEIR. As discussed in this section, impacts to sensitive receptors would be less than significant, because build-out of the Specific Plan would result in no intersection which would generate intersection volumes exceeding 31,600 vehicles per hour, which was determined based on the Traffic Impact Analysis completed for the project. Thus, no CO hotspots (an area of localized CO pollution that is caused by severe vehicle congestion on major roadways, typically near intersections) would occur that would violate significance standards.

LETTER

RESPONSE

AY-6 (cont.)

Air quality impacts associated with mobile sources (i.e., moving traffic) are assessed in Section 6.4.3 (Issue 3: Sensitive Receptors) of the PEIR. As discussed in this section, implementation of the project is consistent with the goals of the California Air Resources Board Air Quality and Land Use Handbook: A Community Health Perspective, which makes recommendations directed at protecting sensitive land uses from air pollutant emissions while. The PEIR determined that vehicular traffic would not expose sensitive receptors to substantial pollutant concentrations.

LETTER

RESPONSE

From: Mike Baker
To: [PLN_PlanningCEQA](#)
Subject: PROJECT NAME: Morena Corridor Specific Plan, PROJECT No.: 582608 / SCH No. 2016101021
Date: Sunday, September 30, 2018 6:29:04 PM

2.3.8 Greenhouse Gas Emissions

AY-7	In Table S-1 of the Summary of Significant Environmental Impacts, Transport and Circulation, the city acknowledges that the plan will have "Significant and Unavoidable" impacts on vehicular traffic and the air pollution they emit. (Air Quality 1 st paragraph, P. S-14)The city proposes evaluating the situation six months "after" the certification of the final PEIR. Certify it today and evaluate it later?	AY-7	See response to comment AY-3.
AY-8	Paragraph 3, P. S-15, states that no intersection would generate more than 31,600 vehicles per hour and that this would have a "Less than Significant" impact on pollution. Furthermore, Paragraph 1, P. S-20, states that there will be a "Less than Significant" impact on Greenhouse Gas Emissions.	AY-8	See response to comment AY-4.
AY-9	Which is it? 1 st , where is the traffic study, and 2 nd , there is no mention of the effects of idling	AY-9	See response to comment AY-5.
AY-10	vehicles stuck in traffic vs vehicle traveling thru at the speed limit.	AY-10	See response to comment AY-6.
AY-11	Due to recent realignments of Morena Blvd there are already gridlock situations during morning and evening rush hour. How exactly does the city plan on mitigating the pollution from idling vehicles stuck in the current and future traffic jams?	AY-11	As discussed in Section 6.4.3, implementation of the Specific Plan is not anticipated to result in a CO hot spot associated with idling vehicles, and impacts would be less than significant. Refer also to response AY-6.
AY-12	And how does this further assist the Mayor's Climate Action Plan?	AY-12	Consistency of the Specific Plan with the Climate Action Plan is addressed in PEIR Section 6.9.3 under Issue 2.

LETTER

RESPONSE

From: Mike Baker
To: [PLN_PlanningCFOA](#)
Subject: PROJECT NAME: Morena Corridor Specific Plan, PROJECT No.: 582608 / SCH No. 2016101021
Date: Sunday, September 30, 2018 6:29:53 PM

2.3.10.2 Wildfire Hazards

AY-13 Figure 2-8 show that the Linda Vista portion of the plan is located between two "Very High Fire Hazard Severity Zones". The city acknowledges and discusses the hazard, yet there is no plan to address evacuation of residents that will be affected by the planned road realignments and reduction of traffic lanes coupled by drastic increases in vehicular traffic and gridlock.

AY-14 The Summary of Significant Environmental Impacts, P. S-21, Health and Safety, states that construction would be done to code and therefore impacts would be "less than significant". Any review of California's recent 2018 fire season will show the ability of wildfires to jump from wildlands into dense residential and commercial areas that were built to code.

Where is the plan?

From: Mike Baker
To: [PLN_PlanningCFOA](#)
Subject: PROJECT NAME: Morena Corridor Specific Plan, PROJECT No.: 582608 / SCH No. 2016101021
Date: Sunday, September 30, 2018 6:31:11 PM

2.3.13.2 Parks and Recreation Facilities

AY-15 The plan acknowledges a significant increase in population but has no plans to an increase in park and recreation facilities. The city planning department recommends 2.8 acres of parkland per every 1000 citizens. While it is convenient to point a finger at Mission Bay Park there is the obvious lack of a safe corridor for pedestrians and bicyclist to access that park.

AY-16

AY-17 The plan does not address the actual future population and how and when the new facilities will be constructed. There are no specific plans to increase parkland within the plan area. There is no mention of funding or a timeline for completion.

AY-13 As discussed in Section 6.10.3, there are no objectives or policies contained in the Specific Plan that would interfere with or impair implementation of an adopted emergency response or evacuation plan.

AY-14 As discussed in Section 6.10.3, development that may occur under the Specific Plan within or adjacent to the designated VHFHSZ area could potentially result in significant impacts related to wildfire hazards; however, any development that occurs within the Specific Plan area would be subject to applicable state and city regulatory requirements related to fire hazards and prevention. These requirements would be implemented on a project level, as individual projects are processed under the Specific Plan to ensure fire prevention/protection design elements are included consistent with regulatory standards. Future development proposals would be reviewed for compliance with all Land Development Code and City Fire Code requirements aimed at ensuring the protection of people or structures from potential wildland fire hazards, including brush management regulations. Impacts due to wildland fires would be less than significant.

AY-15 As discussed in the PEIR Section 6.13.3, the Specific Plan identifies one potential additional park site within the Specific Plan area, Tecolote Linear Park, approximately 0.8 acre on the south side of Tecolote Road between the terminus of Savannah Street and Morena Boulevard. However, this would only add a small fraction of the 43.8 acres of additional parkland needed by proposed project build-out. Future development proposed within the Specific Plan area would be subject to payment of DIF for public facilities financing in accordance with SDMC Section 142.0640. An IFS will be approved for the Linda Vista community planning area portion of the Specific Plan area subsequent to the adoption of the Specific Plan that will define applicable DIF fees for future development, including fees for park funding. However, fees would not be adequate to address the extent of the parkland deficit. Payment and receipt of DIF funds is contingent on future development, and

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RESPONSE

	<p>AY-15 (cont.)</p> <p>proposed fees are not designed to fully fund and address the parkland deficit. Although the Specific Plan would not meet the City's standard for population-based parks, it includes policies that would support additional parks within the Specific Plan area. In addition, future park development would be subject to a separate environmental review at the time design plans are available. Thus, the PEIR determined that implementation of the proposed project would result in a less than significant impact associated with the construction of new facilities in order to maintain performance objectives for parks and recreation facilities.</p> <p>AY-16 As noted in Section 6.2, Transportation and Circulation of the PEIR, the Specific Plan identifies policies to coordinate with Caltrans to provide bridge connections from the Specific Plan area to Mission Bay Park and improve cyclist mobility over the Clairemont Drive/East Mission Bay Drive and Sea World Drive/Tecolote Road Bridge. Ultimate construction of a bridge would require further feasibility analysis including site specific environmental analysis and engagement with the community at the time a specific project is proposed.</p> <p>AY-17 See response to AY-15</p>
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LETTER

RESPONSE

From: Mike Baker
To: [PLN PlanningCEQA](#)
Subject: PROJECT NAME: Morena Corridor Specific Plan, PROJECT No.: 582608 / SCH No. 2016101021
Date: Sunday, September 30, 2018 6:31:46 PM

2.3.13.5 School Services

AY-18

Table 2-11 show that there's an excess capacity of <2000 student divided between elementary, middle, and high schools. The plan does not address the need for additional capacity. Lack of local capacity will force parents to drive their children to school outside the area which is against the Mayors Climate Action Plan.

From: Mike Baker
To: [PLN PlanningCEQA](#)
Subject: PROJECT NAME: Morena Corridor Specific Plan, PROJECT No.: 582608 / SCH No. 2016101021
Date: Sunday, September 30, 2018 6:32:23 PM

2.3.14.1, Water Supply,

d. Existing Water Supplies

AY-19

There will sharp increase in the population of the plan area. This will cause an increase on the water supply infrastructure. The water lines are made primarily of cast iron, of asbestos cement, and PVC. The city has an ongoing issue with breaking water pipes. In this area we regularly have water main breaks that necessitate road closures. The only mention of pipe line improvement is that the city PUC will upgrade/replace some of the older pipes during planned maintenance. That's not a plan.

Exactly what is the schedule?

AY-18 Table 2-11 within the PEIR shows that there is excess capacity within the schools serving the Specific Plan area of approximately 720 students.

AY-19 Comment noted. The comment does not identify an inadequacy in the PEIR. However, it should be noted that, as discussed in Section 6.14.3, the City's Public Works Department has planned maintenance that will upgrade/replace some of the older and undersized waterlines within the Specific Plan area, which is scheduled to be completed from 2018 to 2023.

LETTER

RESPONSE

From: Mike Baker
To: [PLN_PlanningCEQA](#)
Subject: PROJECT NAME: Morena Corridor Specific Plan, PROJECT No.: 582608 / SCH No. 2016101021
Date: Sunday, September 30, 2018 6:33:02 PM

2.3.14.2 Wastewater and Storm Collection Infrastructure

AY-20 The plan acknowledges the existing sewer system but does not discuss the impact that a sharp increase in the area population will have on the original pipes. The only mention is the last sentence of this section which states, "The major trunk sewers have been studied to properly convey sewer flows from proposed development". That is not a plan. What/when exactly are the lines going to be upgraded? A sewer line failure cannot have a positive effect on the environment.

From: Mike Baker
To: [PLN_PlanningCEQA](#)
Subject: PROJECT NAME: Morena Corridor Specific Plan, PROJECT No.: 582608 / SCH No. 2016101021
Date: Sunday, September 30, 2018 6:33:54 PM

AY-21 The city has acknowledged that the plan will have a significant effect on the area. Yet there is nothing in the plan that addresses the financing and timelines for commensurate improvement to public facilities including roads, utilities, schools, etc.

From: Mike Baker
To: [PLN_PlanningCEQA](#)
Subject: PROJECT NAME: Morena Corridor Specific Plan, PROJECT No.: 582608 / SCH No. 2016101021
Date: Sunday, September 30, 2018 6:40:32 PM

2.3.12.1 Seismic Faults

AY-22 Figure 2-18 show at least three major earthquake faults running under the Morena area. Per the map, at least half the area including the Jerome's development area, are being constructed on Geologic Hazard Category #31, Liquefaction, High Potential-shallow groundwater, major drainage, hydraulic fills. The city's position is that any damage resulting from earthquakes would be "Less than Significant" because construction will be done to code. What studies have been done about the construction sites to validate this position?

AY-20 Impacts to the existing sewer infrastructure system as a result of implementing the Specific Plan are discussed in Section 6.14.3 of the PEIR. As discussed in this section, in order to ensure that sufficient sewer capacity is available to serve future development, individual projects within the Specific Plan area may be required to perform a sewer study to ensure sufficient sewer capacity is available, and to identify necessary sewer infrastructure upgrades required for the individual project. Additionally, as future projects within the Specific Plan area are implemented, adherence to local and state regulations during construction would ensure physical impacts associated with construction of required infrastructure upgrades are reduced to less than significant. Given ongoing and planned improvements to the system and existing regulations and guidelines to ensure adequate capacity, impacts associated with the wastewater system would be less than significant.

AY-21 As discussed in Section 3.3.9, the project anticipates the adoption of an Impact Fee Study for the Linda Vista Community Plan that addresses the need for public facilities associated with build-out of the Specific Plan. The updated IFS for Linda Vista would incorporate identified facility improvements within the Linda Vista portion of the Specific Plan area, based on facility analysis completed as part of the Specific Plan. The IFS would include potential funding sources for public facilities financing, particularly development impact fees.

AY-22 This comment incorrectly refers to Figure 2-18. Geologic hazards within the Specific Plan area are shown on Figure 2-14. The CBC provides minimum standards to protect property and public safety by regulating the design and construction of excavations, foundations, building frames, retaining walls, and other building elements to mitigate the effects of seismic shaking and adverse soil conditions. The CBC has provisions for earthquake safety based on factors including occupancy type, the types of soil and rock on-site, and the strength of ground shaking with specified probability of occurring at a site. It has been determined that

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RESPONSE

AY-22 (cont.)

compliance with the most current and applicable building codes would ensure that impacts associated with geologic hazards would be less than significant. Refer also to Appendix E of the PEIR which provides a geotechnical and geological reconnaissance for the project area. This report informed conclusions in the PEIR.

LETTER

RESPONSE

From: Tirzo and Eva
To: [PLN PlanningCEQA](#)
Cc: [Council Member Chris Cate](#)
Subject: Oppose to Morena Corridor Specific Plan
Date: Sunday, September 30, 2018 6:37:10 PM
Importance: High

Letter AZ

September 30, 2018

To: Rebecca Malone, Environmental Planner, City of San Diego

AZ-1 We adamantly oppose the Morena Corridor Specific Plan.

AZ-2 This plan will change the character of Clairemont Mesa Community. The residents approved the Clairemont Mesa Community Plan in 1989, because it supported "smart" growth, retain the community character, keep the community suburban with low density, maintain the 30' height limit (approved since 1970), and approved CPIOZ to ensure community input.

AZ-3 The Morena Corridor Specific Plan proposes the exact opposite. It is extremely disappointing that the City of San Diego Development Services and elected officials support this high density plan. We do not want our community to be like UTC, Little Italy, Hillcrest or any other neighborhood where you are advocating low- and mid-rise development with densities of up to 74 DUs/acre.

AZ-4 The existing Linda Vista transit development project is under parked and a traffic nuisance. You will note that in order to use the trolley, you have to park across the street in the industrial area, because there are no transit parking spaces. This development project and the "pretty" pictures in the EIR are not what we want to see along Morena Boulevard.

AZ-5 Once again, the City is advocating more development before infrastructure is in-place. Additionally, the proposed infrastructure improvements are substandard and cannot accommodate your development proposal. Adopting an EIR that sanctions traffic levels at Service Level "F" is unsatisfactory and very myopic. As proposed, the City actually needs to condemn property to widen and add lanes in order to meet the existing condition which is now at Traffic Service Levels "C" or better.

AZ-6 Clairemont Mesa is also a balanced community. This was very important concept when we approved the community plan in 1989. Your proposal to eliminate industrial land is contrary to the goals and objectives of the plan.

AZ-7 Additionally, your proposal advocates the removal of existing affordable housing. While you claim to be adding affordable housing units, you are actually eliminating housing stock that cannot be replaced even under your proposal. These residents will be displaced and not be able to afford your new "affordable" housing projects. When the community plan was approved in 1989, we ensured them that there would not be any density increases. Why have the City planners and elected officials forgotten their duty to the community?

AZ-1 The commenter's opposition to the project is noted.

AZ-2 Neighborhood character impacts were assessed in Section 6.7.3 of the PEIR, in which it was determined that implementation of the Specific Plan could result in a significant impact as a result of future development within the Linda Vista portion of the Specific Plan area due to increased heights and development intensity that could conflict with existing neighborhood character. It should be noted that no density changes are proposed in the Clairemont Mesa portion of the Specific Plan area.

AZ-3 Comment noted. The comment does not raise an issue related to the adequacy of the PEIR analysis.

AZ-4 As detailed in Chapter 3.0 of the PEIR, new and improved parking is designated throughout the Specific Plan area and the Specific Plan includes policies to promote structured and shared parking. Additionally and with respect to adequate parking, planning for high-density residential development near high-quality transit is a focus of the City General Plan City of Villages Strategy, the City's Climate Action Plan, and is consistent with SANDAG strategies identified in the Regional Plan.

AZ-5 As future development proceeds consistent with the Specific Plan, appropriate infrastructure improvements would either be required to be installed concurrent with project development, if warranted, or development impact fees would be paid to ensure infrastructure needs are funded commensurate with the demand generated by development.

LETTER

RESPONSE

	<p>AZ-6 The Light Industrial land use designation and IL-3-1 zone within the Clairemont Mesa Community Plan portion of the Specific Plan area is not proposed to change. See Figures 3-1 and 3-2 of the PEIR.</p> <p>AZ-7 The Specific Plan identifies areas where increases in residential densities would be allowed near existing and planned trolley stations, but does not propose any specific development project or affordable housing development. Future development proposals will originate from private developers. The Specific Plan is intended to provide development at intensities that would allow for a range of housing affordability levels to be accommodated. This comment does not suggest an inadequacy in the analysis of the PEIR.</p>
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LETTER

RESPONSE

AZ-8

As proposed, the high density development will have an overall negative effect on the community and will lower our quality of life in Clairemont Mesa. This entire specific plan should have CPIOZ. Each development project should have environmental review, the 30' height limit should remain in-place, and proposed development should not exceed the existing zoning as currently approved in the Clairemont Mesa Community Plan.

Residents Tirzo Gonzalez and Eva Stresemann

3765 Mario Place, SD, CA

Information from ESET NOD32 Antivirus, version of detection engine 17888
(20180815)

The message was checked by ESET NOD32 Antivirus.

<http://www.eset.com>

AZ-8 Comment noted. The comment does not raise an issue related to the adequacy of the PEIR analysis.

LETTER

RESPONSE

Letter BA

From: Elwyn Garrard
To: [L.V. Planning Group](#)
Cc: [Raise The Balloon](#)
Subject: Morena Corridor Specific Plan (582608 / SCH Nn. 2016101021)
Date: Sunday, September 30, 2018 6:47:22 PM
Attachments: [Attachment 1-Morena LVCPG 2016-06-27.pdf](#)

BA-1

I am writing to voice my comments with the "Draft Program Environmental Impact Report Project No. 582608 SCH Nn. 2016101021, Hereafter referred to as the "Report". I have listed the comments that I have found so far below:

BA-2

1. The draft report provided for my review does not provide a reasonable amount of time to fully read and understand in the time frame allowed. It is 433 pages long with 6 pages of abbreviated terms, and many references to supporting legal documents guiding its development that have not been provided as attachments. It is my belief that if I do not comment on an item in the report today, I will forfeit my right to challenge it in court at a later time. I am therefore stating that I challenge every word on every page as possibly being misleading, untrue, omitting context, misstated or inaccurately referred to in the report at this time.

BA-3

2. I am a resident of "Overlook Heights" adjacent to the Linda Vista development area. I am in favor of reasonable development consistent with those developed by the Linda Vista Planning Group for the Morena Corridor Specific Plan June 27, 2016. Community recommendations of the committee can be found on pages 4,7-10 of that document. See Attachment 1 - Morena LVCPG 2016-06-27.

BA-4

2a. On pages 12 & 13 of the same document the City Analysis Results provided was a misleading response to the communities desire to maintain current zoning of 30 ft by-right and 45 ft by exception and 29 du/acre. City economic consultant's found the land to be worth \$5.2 million/acre and with road improvement costs it could not be developed at a profit. If this is true, the cost of the land has been proven to be estimated at too high a value for the current zoning and improvements and needs to be lowered in price. This allows the City to imply to the community that the zoning must be changed and density has to be increased. I would like to know who made these estimates and see the supporting documents.

BA-5

3. From the Report [Executive Summary \(Project Objectives\) pages S2 & S3](#)

Within the Linda Vista Community Plan area:

- o Establish land uses that facilitate transit-oriented mixed-use development in transit priority areas.
- o Leverage regional transit investment and provide critically needed housing by designating high-density residential and mixed-use development within close proximity to the transit stations.
- o Allow for employment-related land uses near transit and residential use consistent with the General Plan and CAP.
- o Create community villages that enhance pedestrian connectivity within and between neighborhoods.
- o Identify areas within villages for accessible public gathering spaces such as public plazas and outdoor seating.
- o Establish a grid circulation network to increase multi-modal connectivity and safety, improve circulation efficiency, and create more standardized block sizes for multi-modal travel and development feasibility.
 - Enhance multi-modal connectivity between neighborhoods: Mission Bay Park; and the Clairemont Drive, Tecolote Road, and Morena/Linda Vista trolley stations.
 - Create a complete mobility system that promotes access and increases safety for pedestrians, bicycles, and transit.
 - Identify areas for accessible public gathering spaces and passive recreation opportunities.

BA-6

3a. Please note how different the objectives in #3 above deviate from those of the Community in Attachment 1 - Morena LVCPG 2016-06-27 above.

Why is it that over crowding of humans is considered to be so desirable these days when we don't think the same for chickens and pigs? See Proposition 12 on the California General Election Guide for November 6, 2018 for instance. Do we need a Proposition for the support of "Free range humans? I don't think my environmental quality of life will be improved by trading the benefits of #3 above with the problems described in #3b below. If you think I am misguided, please explain why?

BA-7

3b. From the Report [Environmental Determination page 2 of 6](#)

BA-1 Introductory comment noted.

BA-2 The Draft PEIR was circulated for public review from August 2 through September 17, 2018, meeting the required statutory public comment period of 45 days for an EIR per CEQA Section 15105. The City of San Diego, as Lead Agency for the project, extended the public review period through October 1, 2018, providing additional opportunity for public comment.

BA-3 Comment noted. This comment does not suggest an inadequacy in the analysis of the PEIR.

BA-4 The economic sustainability of the plan is outside the required scope of analysis under CEQA. A fiscal impact analysis and a financial feasibility analysis was prepared as part of the previous study effort for the Morena Boulevard area. This analysis can be found under the Previous Study Documents on the Morena Corridor website, which is available here: <https://www.sandiego.gov/planning/community/specificplans/morena-corridor>. This comment does not suggest an inadequacy in the analysis of the PEIR.

BA-5 This comment restates language from the PEIR. It does not suggest an inadequacy in the analysis of the PEIR.

BA-6 Comment noted. This comment does not suggest an inadequacy in the analysis of the PEIR.

BA-7 Comment noted. This comment does not suggest an inadequacy in the analysis of the PEIR.

LETTER

RESPONSE

Based on the analysis conducted for the project described above, the City of San Diego has prepared the following Draft PEIR in accordance with CEQA. The analysis conducted identified that the proposed project could result in significant and unavoidable impacts in the areas of **Transportation and Circulation (Traffic Circulation)**, **Noise (Vehicle Traffic Noise, Temporary Construction Noise, Construction-related Vibration)**, **Air Quality (Air Quality Plans, Air Quality Standards)**, **Historical and Tribal Cultural Resources (Historic Resources, Archaeological Resources, and Tribal Cultural Resources)**, **Paleontological Resources (Ministerial Projects)**, and **Visual Effects and Neighborhood Character (Scenic Vistas or Views, Neighborhood Character)**. All other impacts analyzed in this Draft PEIR were found to be less than or not significant.

BA-8 4. See the Report Executive Summary (Project Alternatives) page S4

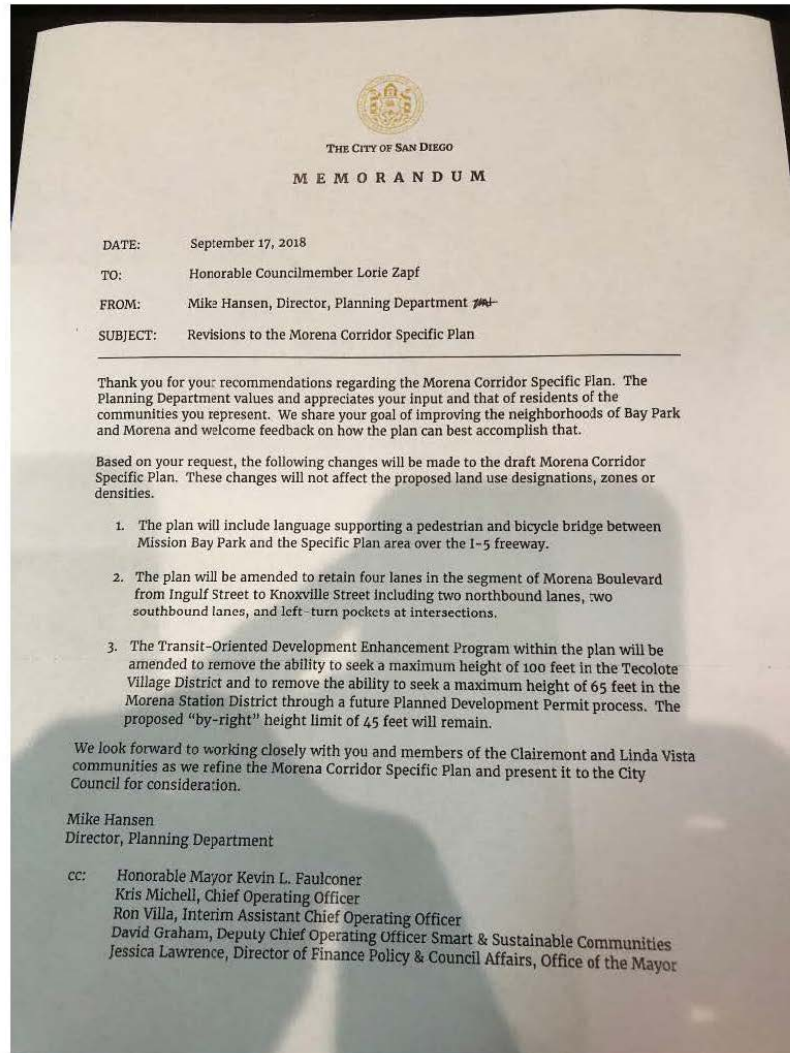
No project and two alternates have been offered in the report. If I had to pick I would take No project over the other two. But I think we can do better if the city and community really work together. In fact, Lorie Zapf received a letter from Mike Hansen, Director of the planning department sent Sept. 17 2018. It offers some hope that we can negotiate a workable solution for the Tecolote & Morena station districts but details for the other districts and whether road mitigation, etc will occur need to be addressed. See Attachment #2 Revisions to the Morena Corridor Specific Plan. Sorry for the quality of the attachment I got via email.

Attachment #2 Revisions to the Morena Corridor Specific Plan

BA-8 Comment noted. The comment does not raise an issue related to the adequacy of the PEIR analysis.

LETTER

RESPONSE



BA-9

5. Guarantee of mitigation timeliness is paramount to this endeavor. It is my understanding the city will provide the infrastructure to support the construction that is approved when it has the money to do so. In the meantime, builders will be able complete construction without the infrastructure being completed. This is not acceptable because it

BA-9 As future development proceeds consistent with the Specific Plan, appropriate infrastructure improvements would either be required to be installed concurrent with project development, if warranted, or development impact fees would be paid to ensure infrastructure needs are funded commensurate with the demand generated by development. Analysis of impacts to public services (police protection, fire protection, schools, libraries, and parks and recreation) are assessed in Chapter 6.13 of the PEIR. The analysis is adequate for a program-level evaluation as there are mechanisms in place for future development to fund necessary services through Development Impact Fees.

LETTER

RESPONSE

<p>endangers the public. What good are paramedics, police, fireman, etc that are stuck in a traffic jam when you need them. What good are firemen when the water pipes are not up to code and have to little water pressure to stop all the adjacent building from burning down too. Who wants to have sewage backing up in to their home because the pipes are too small. Who wants to send their children to over crowded schools, etc, etc, etc.</p> <p>BA-10 I have lived here since 1988 and the Morena Blvd water pipe has broken and been repaired so many times that I can't believe it has not been entirely replace. But a few months ago two more breaks occurred and when the water was shut off to them it caused a third break on Morena and a break near Interstate 8 which collapsed two lanes of the roadway.</p> <p>BA-11 "Overlook Heights", where I live, is adjacent to and approximately the same number of acres as the Linda Vista parcel being developed. It consists of about 350 dwelling units and the area to be developed is scheduled to have about 4,500 dwelling units. That's almost thirteen times the number of people using the infrastructure in my immediate area.</p> <p>BA-12 Construction MUST NOT be allowed to begin prior to assuring that money has been appropriated and that the infrastructure must be completed before the project can be licensed for operation.</p> <p>An example of this problem is #5b below. Waiting till 2050 for relief is not acceptable.</p> <p>BA-13 5b. From the Report <u>Table S-1 (Summary of Significant Environmental Impacts)</u> page S-8</p> <p>Freeway Segments</p> <ul style="list-style-type: none"> • TRANS 6.2-8: I-5 NB and SB, between Grand Ave/Garnet Ave and Old Town Ave – The SANDAG San Diego Forward 2050 Revenue Constrained Network includes operational improvements and the construction of managed lanes along this segment. These improvements are anticipated to be implemented by the year 2050. • TRANS 6.2-9: I-8 EB, between Morena Boulevard and Hotel Circle – The SANDAG San Diego Forward 2050 Revenue Constrained Network includes operational improvements along this segment. These improvements are anticipated to be implemented by the year 2050. <p>I am awaiting your response. Let's work together for a solution.</p> <ul style="list-style-type: none"> • 	<p>BA-10 This comment appears to be focused on adequate water/sewer infrastructure to support the proposed project. As discussed in Section 6.14 of the PEIR, upgrades to sewer and water lines are an ongoing process administered by the Public Works Department and are handled on a project-by-project basis. Because future development within the Specific Plan area would likely increase demand, there may be a need to increase sizing of existing pipelines and mains for both wastewater and water. As future development is proposed, the necessary infrastructure improvements to sewer and water infrastructure would be incorporated as part of standard practice for new development to maintain or improve the existing system to ensure adequate capacity. There is also a mechanism in place to require payment of development impact fees by both ministerial and discretionary projects to ensure infrastructure needs are funded commensurate with the demand generated by development. Additionally, future discretionary projects would be required to undergo project-specific review under CEQA, which would ensure sewer and water infrastructure would be adequate.</p> <p>BA-11 Comment noted. This comment does not suggest an inadequacy in the analysis of the PEIR.</p> <p>BA-12 See response to comment BA-10.</p> <p>BA-13 The comment restates a portion of the PEIR. The comment does not suggest an inadequacy in the analysis of the PEIR; however, the conclusion to comments is noted.</p>
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Morena Corridor Specific Plan

Linda Vista Planning Group
June 27, 2016



Tonight's Agenda – Land Use

- Schedule Overview
- Summary of Community Input
- Land Use Considerations
 - Potential Areas of Change
- Public Comment

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Overall Specific Plan Schedule

Community Outreach

- Kick Off – March 2015
- Establishing the Context – Spring-Fall 2015
 - Existing Conditions Review (Meeting 1)
 - Establishing the Vision and Guiding Principles (Meetings 1 & 2)
- Preparing the Plan Framework – Winter 2016
 - Land Use Consideration Areas/Design Concepts (Meeting 3 & 4)
 - Preferred Land Use and Mobility Concepts (Meeting 5)
 - Urban Design Concepts / Infrastructure (Meeting 6)
- **Drafting the Document –Spring/Summer 2016**
 - Draft Specific Plan
 - Draft Environmental Impact Report (EIR)
- Public Review Draft Specific Plan and EIR – Fall 2016
- Approval Process – Spring/Summer 2017
 - Final Draft Specific Plan and EIR
 - Public Hearings

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Subcommittee's Vision Statement

Community supports a Corridor that:

- Includes mixed residential / commercial uses
- Is walkable
- Retains current height limits
- Provides greater mobility and does not worsen traffic
- Has density compatible with existing neighborhoods
- Quality design that complements the existing unique neighborhood character
- Provides infrastructure and parks for any increases in density
- Retains jobs

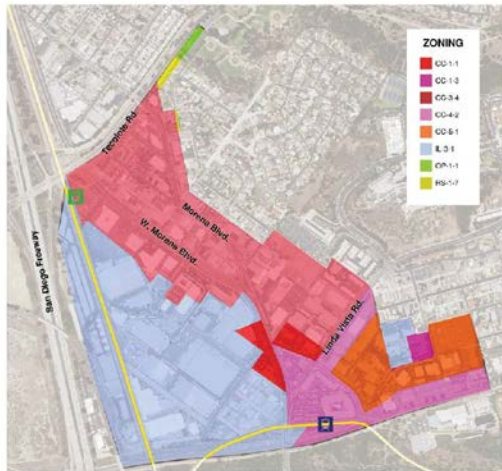
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Specific Plan Area – Linda Vista



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Existing Zoning



<u>Uses</u>	<u>Acres</u>
Commercial:	117
Industrial:	85
Miscellaneous:	2
Total	204

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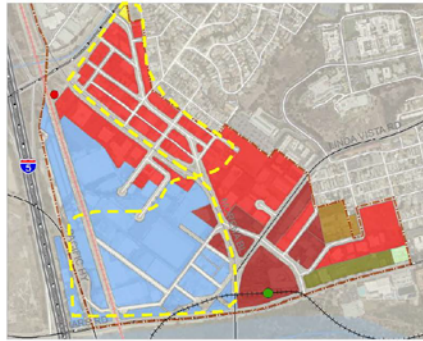
Community Vision - Opportunities/priorities

- Maintain and expand employment – Attract neighborhood-serving retail and higher wage employment
- Ensure development regulations encourage existing business expansion and new business attraction
- Improve Mobility
 - Relieve congested roadways
 - Design a grid network to reduce confusion and improve safety
 - Increase bike and pedestrian safety

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Primary Land Use Recommendations

- Majority of industrial land uses retained
 - Consistent with Vision Statement – *Retain Jobs*
- Promote mixed-use development in commercial areas
 - Consistent with Vision Statement – *Includes mixed residential/commercial uses*
- *Retains current height limits*



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Land Use Recommendation – Artisan District

- Promote small manufacturing and goods production that supports local businesses



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Community Vision – Improved Mobility

Vision Statement Priorities

- Network should provide greater mobility and not worsen traffic
- Area is walkable and inviting

Proposed Grid System Improves Mobility

- Relieves congested roadways
- Reduces confusion and improves safety
- Increases bike and pedestrian safety



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Considerations for Improvements

- Analysis of land development requirements
- To understand whether new development can occur in current market conditions
- To determine whether a project can support additional community benefits
- To inform the land use and zoning recommendations for the Specific Plan

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Analysis Results

- A project is developable when:

The value of the completed project is > total cost of development

Analysis measures “residual land value” – how much one can afford to pay for a site, compared to what land is selling for

- Economic consultant’s findings: Land values are currently \$5.2 million/acre (or \$120/square foot)

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Land Use Considerations

- Existing zoning (29 du/acre) would not support new development and roadway network given current market conditions and land values

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Land Use Consideration Areas

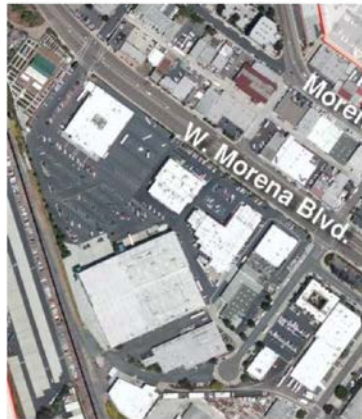
1. Tecolote Station
2. Future East Morena Extension
3. South Linda Vista



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Tecolote Station Considerations

- Adjacent to transit station
- Potential for mixed-use near transit
- Opportunity for neighborhood-serving retail
- Improved walkability
- Streetscape enhancements near community entry
- Public space opportunities



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Tecolote Station Considerations

- Comparison – Comm22

- Comm22
- Mixed-use development
- Adjacent to trolley station
- Streetscape enhancements
- Density – 58 du/acre



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East Morena Extension

The extension:

- Bounds an area of approximately 20 acres
- Is located within ¼ mile of transit station



Associated improvements:

- A completed street grid
- Enhanced bike and pedestrian connections to transit stations
- Improved interface with USD
- Mixed-use opportunity area

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East Morena Extension – Sample Project

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SD Planning Department

- Compatible with scale of nearby multi-family development
- Opportunity for public spaces and improved streetscape
- Opportunity for new community-serving retail locations
- Complete the street grid
- Improve interface with University of San Diego



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South of Linda Vista Road

Associated improvements:

- Approximately 15 Acre area
- Within $\frac{1}{4}$ mile of transit station
- Potential for density that is compatible with adjacent neighborhoods



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Options Moving Forward

- Maintain 29 du/acre zoning and 45 foot height limit – expect limited to no new residential / mixed used development in the near term
- Allow an increase in density at the areas identified for residential and mixed-use development
- Allow for future consideration of increased density and/or height on a case-by-case basis in accordance with established principles

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Next Steps

- Technical analyses – traffic/noise/air quality
 - Determine impacts and mitigation
- Work with community to establish design guidelines and guiding principles

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Letter BB

From: evans.jim60@yahoo.com
To: [PLN PlanningCFOA](#)
Subject: MORENA CORRIDOR SPECIFIC PLAN PROJECT # 2016101021. JAMES D. EVANS
Date: Sunday, September 30, 2018 7:05:29 PM

BB-1

We, the citizens and voters of Overlook Heights, members of RTB from the grassroots are so disappointed with LORIE ZAPH's blatant disrespect of all the hard work we've put into our efforts to keep our neighborhood as the great neighborhood it was/is when we bought in here! Lorie, most of us voted for you in Good Faith based on your integrity but you have really and truly let all of us radically down. Lorie, your non participation of our RTB meetings is proof that actions speak louder than words. And now, in the final days before the election you decide to spread flyers all over Overlook Heights informing US how much you have done for us. Lorie you are insulting us when you do that sort of a thing. These are intelligent people that have worked their ass's off and your ACTIONS of SHINING US ON, as you've chosen to do, is despicable to say the least.

Sent from my iPad

BB-1 Comment noted. This comment does not suggest an inadequacy in the analysis of the PEIR.

LETTER

RESPONSE

Letter BC

From: Melissa Kornblatt
To: [PLN Planning/CEQA](#)
Subject: Morena Corridor
Date: Sunday, September 30, 2018 8:27:39 PM

Re: Morena Corridor
 Project # 582608/SCII
 No 2016101021

- BC-1 As property owners in Bay Park, we would like you to please take these issues into consideration. There is going to be too many people using the Tecolote and Claremont over passes to access your specific plan area. The traffic is going to be terrible.
- BC-2 It would be nice if you create a footbridge over the 5 freeway near the Bay Park Village area. This way, the residents are able to access Mission Bay without having to drive their cars there. This would help eliminate traffic and enhance our neighborhood.
- Thank you
 Melissa & David Kornblatt
- Sent from my iPad

- BC-1 Traffic-related impacts are discussed in Section 6.2 of the PEIR.
- BC-2 As noted in Section 6.2, Transportation and Traffic, of the PEIR, the Specific Plan identifies policies to coordinate with Caltrans to provide bridge connections from the Specific Plan area to Mission Bay Park and improve cyclist mobility over the Clairemont Drive/East Mission Bay Drive and Sea World Drive/Tecolote Road Bridge. Ultimate construction of a bridge would require further feasibility analysis including site-specific environmental analysis and engagement with the community at the time a specific project is proposed.

Letter BD

From: Jim Elko
To: [PLN PlanningCEQA](#)
Subject: Morena Corridor Specific Plan, #582608/SCH No. 2016101021
Date: Sunday, September 30, 2018 11:37:53 PM

Dear Ms Malone,

- BD-1 I would like to make two comments regarding the Morena Corridor Specific Plan's PEIR.
- BD-2
- Let's focus on the Low, Mid, and High (Preferred) Density studies associated with the **Morena/Ingulf/Denver/Clairemont intersections**. Almost all are rated "D" or "F" under "Existing Conditions." What is troubling is that this D/F patterns continue or worsen under nearly all proposed plans of Low/Mid/High (Preferred) density alternatives. In some cases, the proposed plans deteriorate from and "F" to a "F-minus." (There is no rating worse than an "F.") What we have at Morena/Ingulf/Denver/Clairemont intersections are collector streets never designed to handle the traffic load. Ingulf St. and Denver St. are 36-feet wide, which will create untenable traffic congestion at am/pm rush hours. This road section is a "pinch-point," permitting only a few vehicles to pass between the 4-Lane Major Arterials of Clairemont Dr. and Morena Blvd. This proposed traffic congestion is untenable!
- BD-3 As outlined in the PEIR, the mitigation plan is to widen the "approaches" to northbound left-turn and southbound lanes at Clairemont Dr. and Denver Streets. Further, the mitigation proposal to create a "right turn only lane" already exists. Merely widening the **approach** is inadequate and does little to solve the problem. The solution is to widen both Denver and Ingulf Streets from 36-feet and **add new lane**. This added extra lane on Denver and Ingulf between Clairemont Dr. and Morena Blvd. will help alleviate the "hourglass" effect on these narrow collector streets.
- BD-4
- The road section on Clairemont Dr. from Denver St. to Mission Bay Park and back is unsafe! there is only a 5-foot wide sidewalk to accommodate pedestrians. It is dangerous for bicyclists ride on Clairemont Dr. to/from Mission Bay Park when vehicles are transitioning to/from Freeway I-5 at a high rate of speed. This is especially the case on city owned Clairemont Dr. There is simply not enough room for cyclists. The five-foot wide sidewalk is totally inadequate for young families with baby carriages, rolling ice chests, and toddlers to safely walk on Clairemont Dr. and across the Clairemont Dr. overpass to Mission Bay Park. The Clairemont Dr. trolley station currently under construction is a wonderful asset allowing families to enjoy Mission Bay Park. Why are we inviting them to the county's largest aquatic park and yet making it unsafe to get there? Either widen the bridge, widen the sidewalk, create a new pedestrian/bike bridge over the I-5 freeway. What is going to happen when someone using a wheelchair comes into contact with a family coming from the opposite direction with a stroller and toddlers? How many innocent lives might be lost by those wanting to enjoy Mission Bay Park and a city that is unwilling to plan to accommodate them?

Respectfully,
 Jim Elko
 (858) 395-0208

BD-1 Introductory comment noted.

BD-2 This comment does not suggest an inadequacy in the analysis of the PEIR. Project traffic impacts are discussed in Section 6.2 of the PEIR.

BD-3 The comment incorrectly states the mitigation measure at the Clairemont Drive and Denver Street intersection to create a right turn only lane already exists. As stated on page 57 of the Transportation Impact Analysis (see Appendix B of the Draft PEIR), the proposed mitigation measure is to provide a dedicated right turn only lane in the southbound direction, which is currently a shared through-right turn lane. The comment further suggests the widening of Denver and Ingulf streets, which would be inconsistent with the Mobility Element of the Specific Plan.

BD-4 As noted in Section 6.2, Transportation and Traffic, of the PEIR, the Specific Plan identifies policies to coordinate with Caltrans to provide bridge connections from the Specific Plan area to Mission Bay Park and improve cyclist mobility over the Clairemont Drive/East Mission Bay Drive and Sea World Drive/Tecolote Road Bridge. Ultimate construction of a bridge would require further feasibility analysis including site-specific environmental analysis and engagement with the community at the time a specific project is proposed.

LETTER

RESPONSE

Hazard Jr., Enterprises LP
Morena West LLC
10951 Sorrento Valley Rd., Suite 2A
San Diego, CA 92121

Letter BE

September 30, 2018

Rebecca Malone
City of San Diego Planning Department
9485 Aero Drive MS413
San Diego, CA 92123

Re: MORENA CORRIDOR SPECIFIC PLAN #582608/SCH #2016101021

Dear Ms. Malone:

BE-1

Hazard Jr., Enterprises, LP and Morena West, LLC own several commercial properties located within the proposed Morena Corridor Specific Plan update ("Plan") area. The ownership and its families have provided long time business and employment opportunities within the project area and throughout the greater San Diego area for many years. The ownership supports the PEIR for the two Transit stations located at Tecolote and Morena stations for mixed use TOD residential as outlined in the proposed zoning and density of the Plan. The combination of density and good urban planning along with the allowable building height, as written in the current version of the Plan, for the TOD's can achieve a good neighborhood master planning opportunity for the two districts. Such projects provide the opportunity to contribute to a solution for the increasing shortage of housing.

Very truly yours,

Hazard Management, IRT., General Partner


Julius S. Paeske, Jr., CPM®,
Trustee
email: jpaeske@cfisandiego.com
Direct line 858-200-4273

BE-1 The commenter's support for the Specific Plan is noted.

LETTER

RESPONSE

2249 Tokalon Street
San Diego, CA 92110

Letter BF

Rebecca Malone, Environmental Planner
City of San Diego Planning Dept.
9485 Aero Drive, MS 413
San Diego, CA 92123

RE: Comments on the Morena Specific Corridor Plan (PROJECT No.: 582608 / SCH No. 201610102) Draft Program Environmental Impact Report – August 2018

Dear Rebecca Malone,

BF-1 I have reviewed the Morena Corridor Specific Plan Draft Draft Program Environmental Impact Report (PEIR), and I am impressed with the skill and effort that has gone into the report and supporting analysis.

However, the following key items are missing or are incomplete:

- BF-2 1. **Article 3.3.2:** Please discuss why improvements to the Clairemont Drive and Seaworld Drive/Tecolote Road bridges over Interstate - 5 to connect new bicycle facilities identified in the MCSP with existing facilities are not described in the PEIR. The addition of over 7,000 new homes within the MCSP will significantly increase the number of motorists, bicycle users and pedestrians using these facilities, which do not meet modern standards for safety. This is particularly true for pedestrian and bicycle users.
- BF-3 2. **Article 6.2** describes traffic impacts to I-5 Clairemont Drive, I-5 Seaworld Drive and the I-8 Morena Boulevard On-Ramps (Impact 6.2-8 through 6.2-11), which addresses vehicles leaving the community. Please describe impacts vehicular traffic entering the community from the I-5 and I-8 Off-Ramps. Currently, these freeway off-ramps operate at Level of Service (LOS) F during peak periods, and any increase in demand will have negative economic and safety impacts.
- BF-4 3. **Article 6.2** Please describe the impacts of increased vehicular parking both within the Morena Corridor and within the surrounding neighborhood. Occupants of newly constructed multi-family homes with more vehicles than allotted spaces will park in the surrounding neighborhood streets, displacing current home-owners street parking. Quiet streets just outside of the Specific Plan Area boundaries could be filled with cars and traffic with negative impacts to safety.

BF-1 Introductory comment noted.

BF-2 As noted in Section 6.2, Transportation and Circulation, of the PEIR, the Specific Plan identifies policies to coordinate with Caltrans to provide bridge connections from the Specific Plan area to Mission Bay Park and improve cyclist mobility over the Clairemont Drive/East Mission Bay Drive and Sea World Drive/Tecolote Road Bridge. Ultimate construction of a bridge would require further feasibility analysis including site-specific environmental analysis and engagement with the community at the time a specific project is proposed.

BF-3 The vehicular traffic entering the community from local and regional facilities are accounted for in the Transportation Impact Analysis (see Appendix B of the Draft PEIR) including the freeway segments, freeway ramps, roadway segment, and intersection operational analyses. These volumes are assigned to the roadway network segments and intersections based on their travel patterns, as documented in Appendix G of the Transportation Impact Analysis. The intersections within the study area controlling access to the freeway facilities (I-5 Northbound and Clairemont Drive, I-5 Southbound and Clairemont Drive, I-5 Northbound and Sea World Drive/Tecolote Road, and I-5 Southbound and SeaWorld Drive/Tecolote Road) are forecast to operate at acceptable levels of service under all scenarios. The Morena Boulevard ramps with I-8 are uncontrolled; thus, a level of service cannot be determined for the intersection. As such, operations at these locations are acceptable and no design changes are proposed, therefore, build out of the Specific Plan is not anticipated to result in a change to safety conditions at these locations.

LETTER

RESPONSE

	<p>BF-4 As detailed in Specific Plan and discussed in Chapter 3.0 of the PEIR, new and improved parking is designated throughout the Specific Plan area and the Specific Plan includes policies to promote structured and shared parking. Parking requirements are dictated by the Municipal Code and not the Specific Plan. Additionally, planning for high-density residential development near high-quality transit is a focus of the City General Plan City of Villages Strategy, the City's Climate Action Plan, and is consistent with SANDAG strategies identified in the Regional Plan.</p>
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LETTER

RESPONSE

LETTER		RESPONSE
<p style="text-align: right;"><i>Morena Corridor Specific Plan</i> PROJECT No.: 582608 / SCH No. 2016101021 Comments on Draft PEIR Page 2</p>		
BF-5	4. Article 6.2.6.1 states that "...only mitigation measures TRANS 6.2-4, TRANS 6.2-6, and TRANS 6.2-7 are included within the proposed Morena Corridor Specific Plan and Impact Fee Study (IFS). There is no funding mechanism for the remaining measures not included within the IFS." Please explain why the remaining measures were not included in the IFS.	BF-5 The comment requests an explanation why identified mitigation measures were not included within the Impact Fee Study (IFS). As stated in the PEIR, "There is no funding mechanism for the remaining measures not included within the IFS. Additionally, implementation of the roadway segment and intersection measures not included within the proposed IFS would be inconsistent with the mobility goals of the proposed Morena Corridor Specific Plan. Additional detail regarding the infeasibility of these measures will be presented to decision makers prior to project decision as part of the Candidate Findings.
BF-6	5. Article 6.2.6.1 states that "...implementation of the roadway segment and intersection measures not included within the proposed IFS would be inconsistent with the mobility goals of the proposed Morena Corridor Specific Plan." Please explain how these mitigation measures, which are intended to reduce congestion and improve safety, are inconsistent with the City's mobility goals.	BF-6 The referenced mitigation measures require widening of roadways; thus, degrading the pedestrian and bicycle environments, which is counter to the goals stated in the City of San Diego's General Plan Mobility Element and the stated goals of the Morena Corridor Specific Plan. Additional detail regarding the infeasibility of these measures will be presented to decision makers prior to project decision as part of the Candidate Findings.
BF-7	6. Article 6.2.6.1 states "The ultimate design of identified mitigation improvements represents the design required to reduce potential impacts at build-out of the Specific Plan area, and the effectiveness at the project-level is not known at this time." Please explain how all significant impacts can be addressed in this report without determining all traffic related mitigation improvements at build-out.	BF-7 As a program-level document, the PEIR does not propose any specific development projects, and thus cannot provide specific mitigation measures. Therefore, a mitigation framework is provided, giving future projects guidelines for required mitigation measures that would be implemented at a project level. Since the final designs of future projects are unknown, the analysis took a conservative approach to properly disclose the impact as significant and unavoidable. Future discretionary projects will still be required to provide supplemental CEQA analysis to disclose impacts and identify appropriate mitigation measures (where applicable).
BF-8	7. Article 6.2.6.1 states "Future development projects' transportation studies would be able to more accurately identify potential transportation impacts and provide the mechanism to address project-specific mitigation including, but not limited to, physical improvements, fair share contribution, or transportation demand management measures, or a combination of these measures. Impacts to the majority of the impacted intersections and roadway segments would remain significant and unavoidable." Please explain why the majority of impacted intersections and roadway sections discussed in this paragraph would remain unavoidable.	BF-8 See response to comment BF-7.
BF-9	8. Article 6.2.6.1 states that Impacts 6.2-8 through 6.2-11 are "...unavoidable because the City cannot ensure that the mitigation necessary to avoid or reduce the impacts to a level below significance would be implemented prior to the occurrence of the impact." Based on this statement, please describe: (1) the mitigation measures that could reduce the impacts to a level below significance at buildout of the MSCP, and (2) why construction of these mitigation measures cannot be made a condition of and completed prior to implementation of the MSCP.	
BF-10	9. Article 6.2.6.2 Please describe how the safety of bicyclists and pedestrians using the Interstate-5 and Interstate-8 interchanges will be impacted as a result of the increased vehicular traffic resulting from the MSCP.	

LETTER

RESPONSE

	<p>BF-9 The comment requests identification of the mitigation measures for Impacts 6.2-8 through 6.2-11. These facilities are not under the authority of the City of San Diego; however, Caltrans and SANDAG have a plan in place to determine the long-term improvements necessary for these facilities (San Diego Forward: The Regional Transportation Plan), which has been developed and adopted. To maintain consistency with their vision, the proposed mitigation is based on the improvements identified in the Regional Transportation Plan. The comment also requests an explanation as to why construction of freeway mitigation measures cannot be made a condition of and completed prior to implementation of the MCSP. As stated in the PEIR, "implementation of freeway improvements in a timely manner is beyond the full control of the City since Caltrans has approval authority over freeway improvements."</p> <p>BF-10 Bicycle and pedestrian safety is discussed in Section 6.2.3 of the PEIR. Specifically, the PEIR addresses whether the project would conflict with adopted policies, plans, or programs supporting alternative transportation. Inherent to this discussion is the construction of pedestrian and bicycle facilities that would support improved pedestrian facilities and increased safety for pedestrians and bicyclists. Additionally, all street improvements would be designed consistent with the City of San Diego's Street Design Manual (2002) for the respective classification, where feasible, which includes provisions to accommodate pedestrians, thereby ensuring that pedestrian facilities meet required City design standards.</p>
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LETTER

RESPONSE

*Morena Corridor Specific Plan
PROJECT No.: 582608 / SCH No. 2016101021
Comments on Draft PEIR
Page 3*

BF-11 10. **Article 10.4** states that “...the Mid-Density Land Use Plan Alternative is the environmentally superior alternative for this PEIR.” Please explain why the Mid-Density Land Use Plan Alternative, which is the “environmentally superior” alternative was not selected as the proposed alternative for the Morena Corridor Specific Plan.

BF-12 Without addressing the items discussed herein, the report appears to be incomplete. I do not understand how the City and the surrounding community can make a meaningful decision about this report without these items and the supporting analysis.

Please let me know if you have any questions about these comments.

Sincerely,

Holly Quan
Resident

BF-11 CEQA is required to identify an environmentally superior alternative from the range of alternatives evaluated in the EIR. This process ensures that the decision makers have all relevant information they require to either approve the project, select an alternative, or deny the project in its entirety. The ultimate decision, therefore, will be made by the City Council after a recommendation by the Planning Commission.

BF-12 Conclusion to comments is noted.

LETTER

RESPONSE

Letter BG

From: Debra
To: [PLN PlanningCEQA](#)
Subject: Project Name: Morena Corridor Specific Plan Project No. 582608 / SCH 2016101021
Date: Monday, October 01, 2018 12:09:58 AM

TO: Rebecca Malone, City of San Diego, City Planning Dept, City Council

RE: PUBLIC COMMENT to PEIR

Morena Corridor Specific Plan Project No. 582608 / SCH 2016101021

PUBLIC COMMENT:

As an 8 year resident of Bay Park, I look forward to the new trolley stations in the Morena Corridor, and RESIDENT-INFLUENCED smart growth.
 in other words: NOT Developer, and NOT **non**-resident influenced.

BG-1

BG-2

BG-3

BG-4

BG-5

BG-6

BG-7

1) All this proposed increase in density means NEWLY built condos, so they would have to be \$550,000 to \$1 million cost to residents. These residential buyers have the money, and WILL own multiple cars when they move in. The area around Knoxville St. currently is 5-9 Du/AC, and Tecolote Village District is proposed to be 109 Du/AC, with no expansion of access to the freeway on/off ramps for current or future residents.

2) Appendix B "Transportation Impact Analysis" shows seven of the roadway segments as Level of Service (LOS) **F**, **the worst possible**, and the tables analyzing the "Preferred Plan" shows NO improvement in Level of Service for the majority of LOS **F** roadway segments. They would remain at an **F** level!!! Definition of LOS E is "Unstable operation and significant delay" LOS F is "high delay and extensive queuing" I am particularly concerned with Knoxville - Morena - Tecolote Rd.

3) These residents will find it necessary to use their cars to access Mission Bay Park, and ALL areas of the city to the west, as it is massively dangerous to cross the freeway overpasses by bicycle or by foot. The proposed overpass bicycle lane does nothing to protect bicyclists (or pedestrians) from the danger of vehicles going on and off the freeway. It will still be too frightening to use. Will have to drive cars to Mission Bay in order to bicycle.

Dedicated Bicycle/Pedestrian Bridge over freeway is CRITICAL to meeting CAPS.

4) The City Planning Department's analysis of the Morena Corridor Area, does NOT seem to acknowledge the impact of the physical characteristics of the residential neighborhood next to it. The Plan wants people to walk and bicycle to the Transit Stations, but does not recognize that for most of the residential area: Tecolote Rd to Milton is **steep hills** and bound by canyons limiting alternative routes, **for thousands of residents, Knoxville is the only access to the freeway.**

These large, populated neighborhoods from Tecolote Rd to Milton have heavy, fast traffic, narrow roads, very dark streets after sunset, and a severe lack of sidewalks. That puts residents DRIVING from their homes to the Transit Station, because it is TOO DANGEROUS to walk or bicycle in the neighborhoods with no, or very limited sidewalks. (What would be my walkable route to the trolley, only a few houses on a block have sidewalks -- very strange!) Walking or biking in the road cars whizzing by within inches of you is NOT safe!

5) NO increased height limit, only LOW density should be allowed on Plan section where the Knoxville/Morena Trailer Park is located currently. With Knoxville being the only access to the freeway & transit station for THOUSANDS of people currently residing in the area, there is no other way for residents' cars on this property to exit it, except on Knoxville. This parcel is bound by a RIVER on the other side of it!

6) Bay Park Resident Martin Habel has written a well-thought-out letter on the Morena Corridor Specific Plan and I agree with all of his comments:

As such, I am officially submitting as my first Public Comment, the comments he has made in the attached letter.

Thank you for consideration of my points.

Debra Marks
 4930 Sparks Avenue
 Bay Park

BG-1 Introductory comment noted.

BG-2 Impacts related to traffic are discussed in PEIR Section 6.2.

BG-3 This comment restates conclusions reached in the PEIR. For a discussion of traffic-related impacts, see Section 6.2 of the PEIR.

BG-4 As noted in Section 6.2, Transportation and Circulation, of the PEIR, the Specific Plan identifies policies to coordinate with Caltrans to provide bridge connections from the Specific Plan area to Mission Bay Park and improve cyclist mobility over the Clairemont Drive/East Mission Bay Drive and Sea World Drive/Tecolote Road Bridge. Ultimate construction of a bridge would require further feasibility analysis including site-specific environmental analysis and engagement with the community at the time a specific project is proposed.

BG-5 The Specific Plan includes policies to improve pedestrian and bicyclist safety that would benefit surrounding neighborhoods as well. The comment does not raise an issue regarding the adequacy of the PEIR.

BG-6 Comment noted. The comment does not raise an issue related to the adequacy of the PEIR analysis.

BG-7 See responses to comments to Letter M.

LETTER

RESPONSE

Letter BH

From: Janet Croft
To: [PLN Planning/CFQA](#)
Subject: Morena Corridor Specific Plan project No. 582608 /SCH No. 2016101021
Date: Monday, October 01, 2018 12:10:34 AM

BH-1

The Morena Corridor Specific Plan seems to be only a veiled plan to chip away at the 30' height limit and eventually eliminate it altogether. It does not protect the neighborhoods or current residents affected by this plan as promised. It is environmentally flawed and does not address the real needs of the communities accurately. In short reject it.

Karl Croft

BH-1 Comment noted. The comment does not raise an issue related to the adequacy of the PEIR analysis.

LETTER

RESPONSE

Letter BI

From: Carol Baker
To: [PLN_PlanningCEQA](#)
Cc: [CouncilMember Lonie Zapf](#); [Faulconer, Mayor Kevin](#); [CouncilMember Chris Cate](#); [Councilmember Barbara Bry](#); [Councilmember Christopher Ward](#); [Councilmember Myrtle Cole](#); [Councilmember Mark Kersey](#); [Councilmember Scott Sherman](#); [CouncilMember David Alvarez](#); [Councilmember Georgette Gomez](#)
Subject: Morena Corridor Specific Plan (582608 / SCH No. 2016101021)
Date: Monday, October 01, 2018 12:16:35 AM

Dear Rebecca Malone,

- BI-1 I am a resident of Overlook Heights in the Linda Vista Planning Group area. I have been a resident for 14 years. I am also a 2nd generation San Diegan. There are some **facts** that are not addressed in the EIR, that has strong historical basis.
- The EIR is based on assumptions that are not real or factual. They are made up to meet some arbitrary goal put in place by politicians that do not know how to follow out the consequences of these extremely life threatening decisions.
- BI-2 1) the infrastructure is not **REQUIRED** to be updated to accommodate the high density.
 Without this, you are creating a situation that puts hundreds, if not thousands of people in danger. If you were not a resident of San Diego in the 1980's, let me tell you why.
 Starting in the 1970's the city leaders encouraged owners in the mid city area to build 7 to 9 units in place of their single family homes. (Even these had 1 car off street parking per unit.*) But the city did no upgrades to the infrastructure. When a fire started in the hill above Mission Valley and below the Normal Heights/Kensington area, it could not be fought from the top of the hill. The water lines were never upgraded and so the fire hydrants did not have enough water pressure to combat the fire as it crested the hill. Many lost their homes because of the city's poor planning. A side note: Overlook Heights is a cul-de-sac neighborhood. The only egress/ingress in on a 3 block stretch of Morena Blvd. We have Tecolote Canyon on 2 sides. If a fire broke out in Tecolote Canyon and came up to our neighborhood, we would all be trapped by gridlocked streets. And if no upgrades to the water lines, you would be the one signing our death warrant.
- BI-3 2) The city not requiring off street parking is NOT based on factual evidence that this will make residents of the new high density housing use public transportation. Or that the residents will NOT own a vehicle.
 Without this factual evidence, the real life results are these high density residents parking in the trolley parking lot nearby, the business district and the residential neighborhood nearby.
 If businesses do not have parking for their customers they will go out of business. This is a proven fact.
 If the trolley does not have parking the riders will not use it. Another proven fact.
 *With .5 off street parking per unit suggested, the streets will be over crowded, leaving residents to walk a very long way to and from their vehicles. This creates an extremely dangerous situation for individuals that must walk this route at night. Especially with the dumping of the criminals/sex offenders back on the street instead of actually

- BI-1 Comment noted. While the commenter states that the EIR lacks adequate analysis, specific concerns are detailed in the remainder of the letter and responses provided accordingly.
- BI-2 Wildfire hazards are addressed in Section 6.10 of the PEIR. As stated therein, future projects would be required to adhere to regulatory requirements which include the provision of prevention measures include vegetation (brush) management, such as selective removal/thinning and fire-resistant plantings to create appropriate buffer zones around development. Other standards require incorporating applicable fire-related construction and design elements including fire-resistant building materials, fire/ember/smoke barriers, automatic alarm and sprinkler systems, and providing adequate fire flow and emergency access.
- BI-3 As detailed in Chapter 3.0 of the PEIR, new and improved parking is designated throughout the Specific Plan area. Additionally, the Specific Plan includes policies to promote structured and shared parking. With respect to adequate parking and trolley ridership, planning for high-density residential development near high-quality transit is a focus of the City General Plan City of Villages Strategy, the City's Climate Action Plan, and is consistent with SANDAG strategies identified in the Regional Plan. While it cannot be guaranteed that future residents will use transit, providing density near transit incentivizes residents to do so. The remainder of this comment related to criminals is outside the scope of the CEQA document. However, the PEIR provides a framework to ensure adequate police services are available as future development occurs (see PEIR Section 6.13).

LETTER

RESPONSE

	keeping them in prison.		
BI-4	3) The EIR uses vague, unqualified terms such as "should", "could", "might", "consider". These terms must be more precise. They need to be terms such as "required", "must".	BI-4	Comment noted. Various terms used throughout the PEIR including those referenced in the comment. At a program level of analysis, it is acceptable to acknowledge that impacts could occur, and then provide a framework for future mitigation should impacts actually occur based on subsequent project level analysis.
BI-5	4) This plan does not meet the Mayors Climate Action Plan. Without the factual knowledge that 6000 more units (equates to 10,000 more people and at least 6000 more vehicles) will not own a vehicle and use public transportation exclusively, idling vehicles at gridlocked roads will produce more carbon emissions, not less.	BI-5	The proposed project was found to be consistent with the City's CAP. As discussed in Section 6.8.3, one of the five primary strategies identified in the CAP is to implement bicycling, walking, transit, and land use strategies that promote increased development capacity for transit-supportive residential and employment densities and provide more walking and biking opportunities in Transit Priority Areas. The project proposes increased housing densities and non-residential intensities adjacent to the trolley stations within the TPAs. In addition, the proposed project provides mobility recommendations intended to improve pedestrian and bicycle connectivity consistent with the CAP land use and mobility strategies. For a complete discussion on how the project would be consistent with the goals of the City's CAP, see Section 6.8.3 of the PEIR.
BI-6	5) The EIR did not account for the nearby high density of the development less than 3 miles away that will be using these same streets. This is a fact. Everyday vehicles exit highway 5 at Sea World Dr and use Morena Blvd to access Linda Vista Rd and Friars Rd. There will be gridlocked streets because there is no enforceable means of insuring the new high density residents do not own a vehicle that will be traveling the streets. It is a fact based on real life. IF the traffic study was actually done with real life figures instead of numbers based on unrealistic assumptions to meet the goals of the city planners/state politicians that do not logically follow their decisions out to the factual conclusion, it would show the true, fact based results.		
BI-7	6) The EIR does not "require" the new high density units to provide affordable housing. Without a "requirement" this will not happen. Look at the past projects to get the real life facts. Developers will buy out of the 10% rule. Affordable housing "must" be provided at no less than 50% of the units. With no waiver for the developer. Even if the developer provides 10% at the affordable rate, is that enough for the teachers, fire fighters, law enforcement that are in need of affordable housing? Past evidence says not.		
BI-8	7) Affordable housing does not exclusively mean rental units. There needs to be a "requirement" for home ownership. Even the people who qualify for affordable housing do not wish to be a tenant for the rest of their lives. They would like to be a home owner. This is a fact. These policies are creating a welfare class by forcing lower middle class and lower income individuals into rentals for the rest of their lives.	BI-6	The comment states the Draft PEIR did not account for the nearby high density of an unidentified development. The Transportation Impact Analysis (see Appendix B of the Draft PEIR) analyzed land uses that have been approved and those included in the Regional Model. The future Riverwalk Development—which will utilize roadways referenced in the comment—has not been approved by City Council; therefore, the current land use assumptions provided by the Regional Model for that site were included in the analysis. As shown in Appendix G of the Transportation Impact Analysis, this includes over 50,000 trips generated at the Riverwalk site. Standard trip generation assumptions were utilized for all land uses, including high-density multi-family developments; no reductions based on vehicle ownership were assumed.
BI-9	There are many things wrong with this EIR. The main problems is the "assumptions" it is based on and the vague, non committable language allowing the most important items to be delayed and never completed. This EIR must be redone with factual evidence and not unrealistic assumptions.		
BI-10	I would like to reference the comments submitted by the Linda Vista Planning Group Ad Hoc committee for the Morena Corridor Specific Plan. That document lists the majority of the flaws with the EIR.		
BI-11	Thank you for considering my comments. I look forward to the city planners and the city council members doing the right thing by the residents of Morena Corridor Specific Plan and all neighborhoods within the TOD area.		
	<p>*Please confirm receipt of email*</p> <p>Carol Baker 619-292-8551</p>		

LETTER

RESPONSE

	<p>BI-7 Future development within the Specific Plan area would be required to demonstrate consistency with City regulations related to affordable housing that may include providing affordable units and/or payment of in lieu fees.</p> <p>BI-8 See response to comment BI-7.</p> <p>BI-9 The comment does identify a specific issue related to the adequacy of the analysis or otherwise discuss why the analysis is deficient; thus, a specific response is not required.</p> <p>BI-10 See responses to comments in Letter AR.</p> <p>BI-11 Concluding comments are noted.</p>
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LETTER

RESPONSE

Letter BJ

From: Ellen Quigley
To: [PLN_PlanningCEQA](#)
Subject: Project Morena Corridor Specific Plan #582608/SCH No. 2016101021
Date: Monday, October 01, 2018 8:41:09 AM

Attn. Rebecca Malone:

- BJ-1 I am a 10 year resident of Overlook Heights and a registered voter. I have attended and spoken at some Planning Comm meetings regarding this project noted above, and I have submitted written comments in 2017 and now in 2018. I care about San Diego and the quality of life here and am VERY concerned that the City is NOT taking charge of the current city growth by setting parameters and budget needs for how that growth occurs.
- BJ-2 In the 8/28/18 Planning meeting at USD, I was told that the Planning comm. does not have the power to require builders of the apartment units near Tecolote Station to provide underground parking for tenants. I lived in Santa Monica for many years and can testify that the Santa Monica City Councils (1980-90's plus) did place requirements on builders to provide underground parking, and other needs of affordable units and other environmental needs. For example, if a developer want to build luxury housing by the ocean, they had to also build realistic affordable housing in another part of Santa Monica along with environmental park areas etc. **which met the communities needs! These types of planning needs could not be "waivered " away.**
- BJ-3 As Howard Wayne noted in his 8/28/18 Chairman's Report and on the EIR,
 "4) The City's plan ignores the community input.
 The Vision plan approved February 16, 2016 called for:
 a. Retention of the current height limits
 b. No worsening of traffic
 c. Density compatible with the existing neighborhoods
 d. Plan for infrastructure and parks for any increase in density
- BJ-4 5) City's proposed plan:
 a. **Raise the height limit to 100 ft at Tecolote Station and 65 ft at the existing Morena station.**
 b. **Narrows Morena Blvd Southbound to one lane and suggest a traffic circle**
 c. **Increases density at Tecolote Station from 29 units per acre to 109 units per acre and 73 units per acre at the Morena station. (to help conceptualize, the Tecolote Station is approximately 20 acres. This means over 2000 units can be built at the Jeromes/Toys R Us properties with only half a parking space per unit. It does not matter if they are studios, 1, 2 or 3 bedroom units.)**
 d. Does not provide for infrastructure to match density increase.
- BJ-5 6) **Not a "collaborative process between the community and the City".**
 Strongly suggests Planning Dept had predetermined outcome. See EIR, "Project Objectives, S-2:
 "The following objectives were identified to outline the underlying purpose for the proposed project..."
 "Promote high-density residential and employment opportunities"
- BJ-6 7) **NEED a ridership study to support the extreme densification**
 a. City assumes the high density areas will regularly use the trolley instead of

- BJ-1 Introductory comment noted.
- BJ-2 The project is consistent with City regulations relating to the provision of adequate affordable housing and/or payment of in lieu fees. Parking requirements are established in the City Municipal Code and future projects will be required to demonstrate compliance with applicable parking regulations. Currently, there is no requirement for underground parking in the Municipal Code.
- BJ-3 Comment noted. This comment does not suggest an inadequacy in the analysis of the PEIR. With specific respect to traffic impacts and parks, see Sections 6.2 and 6.13 of the PEIR, respectively.
- BJ-4 With respect to infrastructure being developed to serve the proposed increase density, implementation of the mitigation framework contained within the PEIR provides guidance for future development to ensure that mitigation, including infrastructure improvements, would occur as needed, on a project-by-project basis.
- BJ-5 The comment restates a project objective. As stated in CEQA Guidelines Section 15124, the project's Statement of Objectives, "should include the underlying purpose of the project." The PEIR included an objective for high-density residential and employment opportunities consistent with the City of Villages strategy and SANDAG's smart growth model.
- BJ-6 The City recognizes that it cannot be guaranteed that future residents will take advantage of transit; however, planning for high-density residential development near high-quality transit is a focus of the City General Plan City of Villages Strategy, the City's Climate Action Plan, and is consistent with SANDAG strategies identified in the Regional Plan.

LETTER

RESPONSE

<p>vehicles. This justifies less than one parking space/unit.</p> <ul style="list-style-type: none"> b. No ridership study supports that c. Friars Road rebuts it. d. Residents will still own a car even if they ride the trolley regularly. Where will they park?" <p>BJ-7 THE CRITICAL CONCERNS REGARDING THE FAILURE TO HAVE CONCRETE FEASIBLE INFRASTRUCTURE PLANNING AND BUDGETING TO MEET THE SURGE IN POPULATION AND INFRASTRUCTURE NEEDS ARE UNACCEPTABLE! The Plan only states "could" require upgrades. It should state upgrades are <u>required</u> as well as budgeting to realize them!</p> <p>BJ-8 Our community both residents and local business who serve residents, workers and many other inhabitants of San Diego are put at great risk by the failure of both the Planning Commission and the City Council to listen to us and not realistically plan! Howard Wayne's EIR Review submitted at the 8/28/18 meeting details suggestions of wording changes to make policies enforceable.</p> <p><u>My vision of this UNPLANNED FUTURE is a nightmare</u> of vacant business - like Sardina's and Andres restaurants on Morena due to traffic gridlock, power outages and other infrastructure failures as we residents (if we do stay and we do want to!!!) breathe horrific smog full of emissions and green house gases!</p> <p>The Vision plan approved February 16, 2016 called for:</p> <ul style="list-style-type: none"> a. Retention of the current height limits b. No worsening of traffic c. Density compatible with the existing neighborhoods d. Plan for infrastructure and parks for any increase in density <p>Please help the Morena community and the City of San Diego realize that vision! As Howard Wayne well concluded in his report: "We welcome mixed use development, some additional density, infrastructure to meet the needs increased density imposes, and affordable housing.</p> <p>This plan does not deliver any of the community's input nor what the Ad Hoc committee recommended."</p> <p>I, as I assume you also do, love San Diego and want to work for positive growth! I plan to forward this to all the City Council members and the Mayor. Thank you for your time and energy.</p> <p>Sincerely,</p> <p>Ellen Quigley</p>	<p>BJ-7 As future development proceeds consistent with the Specific Plan, appropriate infrastructure improvements would either be required to be installed concurrent with project development, if warranted, or development impact fees would be paid to ensure infrastructure needs are funded commensurate with the demand generated by development.</p> <p>BJ-8 Concluding comments noted.</p>
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LETTER

RESPONSE

Letter BK

From: Barbara Torres
To: [PLN PlanningCEQA](#)
Subject: Morena Corridor Specific Plan PROJECT No.: 582608 / SCH No. 2016101021
Date: Monday, October 01, 2018 9:16:54 AM

Dear Planning Department,

BK-1 As a Clairemont resident, I support in concept the developments coming to the Clairemont area, and the Morena corridor specific plan.

BK-2 **First:**
 I am in favor of the low-density option highlighted in the draft. I would like to state that my overall concern is with increase vehicle miles driven through the community as a whole, and request that careful planning be devoted to alternative transportation routes/methods, in addition to bike/ped access to Tecalote nature center/park and mission bay.

I would be open to considering the mid-density alternative if a more comprehensive traffic study is performed.

BK-3 **Second:**
 Please consider the community in which you are proposing new units to be built. Clairemont is a blue collar, medium income community, and does not call for "luxury apartments" renting for a minimum of \$2000 for a one bedroom apartment. If the new developments only concentrate in luxury builds, it will further inflate the cost of homes in the area, and push its residents out. I know the planning department does not control the market, but it is under your general purview to maintain the affordability of homes within the community you are calling for new development.

BK-4 **Third:**
 If/when an alternative is chosen, I would like for the community of Clairemont (maybe through the planning group) to be part of the RFP process, specifically when selecting a design, or overall "look", of the new development, and its prime contractors.

BK-5 Thank you for the work you do, and please remember that not every one in the community is against new development.

Sincerely,

Barbara Torres
 805-280-9059



BK-1 The commenter's support for the project is noted.

BK-2 The commenter's support for the Low-Density Alternative is noted. This comment does not suggest an inadequacy in the analysis of the PEIR.

BK-3 Comment noted. This comment does not suggest an inadequacy in the analysis of the PEIR.

BK-4 Comment noted. This comment does not suggest an inadequacy in the analysis of the PEIR.

BK-5 Concluding comments noted.

LETTER

RESPONSE

Letter BL

From: Erin Cullen
To: [PLN_PlanningCEQA](#)
Subject: PROJECT NAME: Morena Corridor Specific Plan PROJECT No.: 582608 / SCH No. 2016101021
Date: Monday, October 01, 2018 2:37:12 PM

Rebecca Malone, Environmental Planner
 City of San Diego Planning Dept.

BL-1 I would like to start out by asking a simple but important question. How can any kind of a study be done when the the **Land Use and Zoning** have been taken out of the MBSP? How can you figure Traffic? Environmental? Noise? Public Services? The list goes on and on. Due to the fact this study is 433 pgs long I will only touch on a couple of issues.

BL-2 Transportation and Circulation:
 <!--[if !supportLists]-->1. <!--[endif]-->I travel Hwy. 52 on a regular basis and have been watching the traffic start to slow or stop around the Genesee or Clairemont exits. Commuters have now taken to getting off at these exits instead of waiting to get onto the 5 frwy. They are going through neighborhoods and down to Morena Blvd. to jump back on the 8 and 5 frwys. With this influx of traffic and the fact that there is no **Land Use and Zoning** directly associated with this PEIR how is it possible to come up with the statement that greenhouse gas emissions is “Less than significant”? I find this comment unacceptable and should be reconsidered when **Land Use and Zoning** are added back into the MBSP!

BL-3 <!--[if !supportLists]-->2. <!--[endif]-->“Improve access to Mission Bay Park” has been a guiding principle of the MBSP yet it has been not been sufficiently addressed in the PEIR. A person takes their life in their hands when trying to cross 6 different intersections on the south side of Clairemont Dr. to get to the bay. White rubber separation poles will NOT do anything for anyone! We as a community have continued to work towards getting the City to understand that Clairemont Dr. accesses Mission Bay (The nation’s largest water park) and must have a separate pedestrian/bicycle bridge for the safety of everyone. You want people to take the trolley to the bay then we need to have a safe way to get them there without having to schlep strollers, coolers, chairs etc. over the most dangerous crossing to the bay!

Health and Safety:

BL-4 <!--[if !supportLists]-->1. <!--[endif]-->PEIR suggests “very insignificant” while

BL-1 For a discussion of land use impacts, see Section 6.1 of the PEIR. For a discussion of proposed land use and zoning changes under the Specific Plan, see Section 3.3 of the PEIR. Land use and zoning changes are proposed for the Linda Vista portion of the Specific Plan area only.

BL-2 The Draft PEIR does include land use and zoning changes for the Linda Vista portion of the Specific Plan area. Thus, traffic and greenhouse emissions include assumptions based on the proposed land use changes. Refer to Section 6.2 of the PEIR for a discussion of transportation and circulation impacts. Refer to Section 6.8 of the PEIR for a discussion of greenhouse gas emissions.

BL-3 A discussion of impacts associated with alternative transportation (pedestrian facilities, bicycle facilities, and public transit) can be found in Section 6.2.3 of the PEIR. As noted in Section 6.2, Transportation and Circulation, of the PEIR, the Specific Plan identifies policies to coordinate with Caltrans to provide bridge connections from the Specific Plan area to Mission Bay Park and improve cyclist mobility over the Clairemont Drive/East Mission Bay Drive and Sea World Drive/Tecolote Road Bridge. Ultimate construction of a bridge would require further feasibility analysis including site-specific environmental analysis and engagement with the community at the time a specific project is proposed.

BL-4 PEIR Section 6.10 addresses the potential impacts associated with wildfire. This section identifies the portion of the project’s location as mapped as a Very High Fire Hazard Severity Zone (VHFHSZ) by the California Department of Forestry and Fire (see PEIR Figure 2-8). The area referenced in this comment is located outside the boundaries of the Specific Plan area. To ensure fire safety throughout the Specific Plan area, future projects would be required to adhere to State and City regulatory requirements related to fire hazards and prevention. The PEIR does conclude that through regulatory compliance impacts due to wildland fires would be less than significant.

LETTER

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discussing wildfires. How can that be? I can only think back to a time when Normal Heights burned. Was that considered "very insignificant"? I watched those homes burn to the ground. I would strongly suggest a new study of Tecolote Canyon be considered. Overlook Heights is limited in its entrance and exit points. If there is a fire how are the residents supposed to evacuate if fire trucks and ambulances are coming up the road?

Public Services and Facilities:

BL-5 <!--[if !supportLists]-->1. <!--[endif]-->I will only ask one question. How can any part of this study even be taken seriously without having any knowledge of what the **Land Use and Zoning** Portion of the MBSP study is? Police? Fire? Schools? Libraries? How many more dwelling units? WE DON'T KNOW.

BL-6 In closing I would like to express my disappointment in the City and Planning Commission. We as a community came together spending 4 years going to meetings and thinking we would actually be able to be a part of a process in reshaping our community. When **Land Use and Zoning** were taken out of the Morena Specific Plan and the PEIR was presented without ANY of what we had worked so hard for I realized that we have a lot of work ahead of us.

BL-7 This plan is flawed. There is no forward thinking only what we can shove in the area and just deal with the "significant and unavoidable" later. This is no way to treat a community! The whole plan should be reconsidered with the **Land Use and Zoning** portion put back into the plan and done right!

Sincerely,

Erin Cullen
Bay Park resident

BL-5 For a discussion of land use impacts, see Section 6.1 of the PEIR. For a discussion of proposed land use and zoning changes under the Specific Plan, see Section 3.3 of the PEIR. Impacts to public services, including police, fire, schools, and libraries, were assessed based on the proposed land use and zoning designations under the Specific Plan. Analysis of impacts to these public services was completed, a discussion of which can be found in Section 6.13 of the PEIR.

BL-6 For a discussion of land use impacts, see Section 6.1 of the PEIR. For a discussion of proposed land use and zoning changes under the Specific Plan, see Section 3.3 of the PEIR. Land use changes within the Clairemont Mesa portion of the Specific Plan area will be considered comprehensively with the pending Community Plan update. The PEIR analyzes the Final Morena Corridor Specific Plan. No additional analysis is required.

BL-7 Comment noted. This comment does not suggest an inadequacy in the analysis of the PEIR.

CASTER Properties, Inc.
 "Family Owned Since 1959"

Letter BM

4607 Mission Gorge Place
 San Diego, CA 92120
 Phone 619.287.8873
 Fax 619.287.2493

www.a1storage.com

October 1, 2018

To: PlanningCEQA@sandiego.gov

CC: rmalone@sandiego.gov

Re: Morena corridor specific plan

From: Brian Caster CEO Caster companies

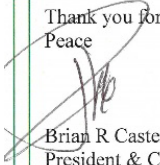
BM-1

We would like to support the Two PEIR for the two transit stations (Tecolote and Morena) for mix use TOD residential as outlined in the proposed zoning and density. The city must use these valuable properties to place the highest density next to the trolley stops.

The property owners at and around the Morena planning area have done our part in helping the city to design towards the smart growth goals the city has and to help meet the pent up demand for housing. Now the Planning commission and the city council need to step up and do their part and approve the combination of density and good urban design and allowable building heights in these two station districts.

The Caster family has been supporting these kinds of efforts here in San Diego now for over 60 years and we look forward to seeing these two project areas be built out as planned in the near future so our family and so many others can continue to have a place to live here in San Diego.

Thank you for allowing us to comment.
 Peace


 Brian R Caster,
 President & CEO
 Caster Properties / A-1 Self Storage

BM-1 The commenter's support for the project is noted.



Letter BN

October 1, 2018

Rebecca Malone
City of San Diego Planning Department
9485 Aero Drive, MS 413
San Diego, CA 92123

Re: Comments on the Morena Specific Plan

Ms. Malone:

BN-1 The current plan, as shown, makes some significant changes to the traffic patterns off Linda Vista Road. It calls for the annexing of Metro Street and shows a road running north off Linda Vista that impacts a number of privately held properties to make way for the new road.

The current PEIR is flawed as it has no provisions to procure this land to make the necessary proposed changes. There have been assurances that eminent domain is not being considered to procure land for this project. I would like to suggest the land for the proposed road be taken from an adjoining piece of land owned by USD, as I believe this plan is partially implemented to for better circulation due to USD's increased enrollment. In this way, the traffic can be modified without impacting the properties on Metro Street and still giving the desired circulation to USD.

BN-2 I have owned a property on Metro for the past 14 years. We have spent more than a million dollars enhancing and customizing the property to one of the best looking buildings in the area. Annexing our street and forcing us to rebuild will greatly affect our company and the families we support.

Additionally, it will cause us to terminate our tenant's long term lease we currently have in place which would destroy their business as well.

If you would like to discuss this or take a tour of our building please contact us at your earliest convenience.

Sincerely,

R. J. (Jim) Sweig
Sweig General Contracting, Inc.
5328 Metro St.
San Diego, CA 92110-2608
(619) 325-6333

5328 Metro St. San Diego, CA 92110 Fax (619) 325-6334 Office (619) 325-6333 Lic.#764317

BN-1 Policies 3.1.1 through 3.1.4 address the implementation of right-of-way extensions and street vacations. Procurement of property is not within the scope of the EIR.

BN-2 Implementation of the Specific Plan would not force changes to existing properties. It rather provides guidelines for new improvements to occur. This comment does not suggest an inadequacy in the analysis of the PEIR.

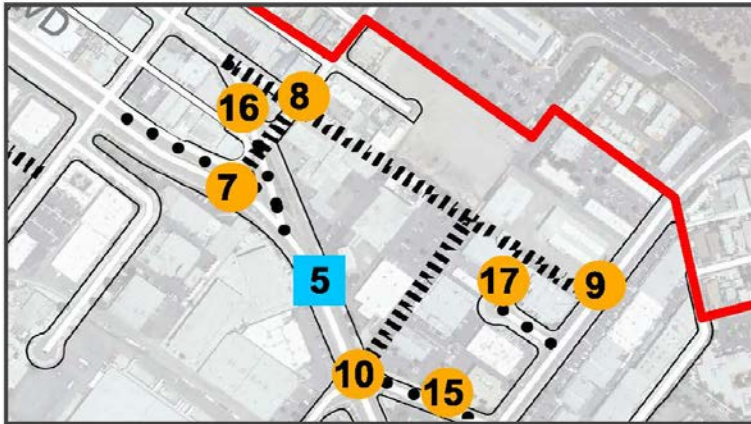
Morena Corridor Specific Plan

Improvement 16: Vacate Morena Boulevard between West Morena Boulevard and Morena Place

- As part of the proposed improvements, a segment of Morena Boulevard will be closed/vacated to allow for the re-establishment of a more typical street grid, and accommodate other proposed improvements to improve mobility for all modes.
- Morena Boulevard will be closed from where the extension of Morena Boulevard begins to West Morena Boulevard. Cushman Avenue extension bisects this vacated segment.

Improvement 17: Vacate Metro Street

- Vacate Metro Street north of Linda Vista Road to minimize the number of intersections along Linda Vista Road.
- Implement this improvement concurrent with the extension of Morena Boulevard.



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Letter BO

From: Mike Hunsaker
To: [PLN PlanningCFOA](#)
Subject: Comment letter for the Morena Corridor Draft EIR Project No. 582608/ SCH 2016101021
Date: Monday, October 01, 2018 4:46:12 PM

To: Rebecca Malone, Environmental Planner
 City of San Diego Planning Department
 9485 Aero Drive, MS 413
 San Diego, CA 92123

Subject: Comment letter for the Morena Corridor Draft EIR Project No. 582608/ SCH 2016101021

Dear Ms. Malone,

BO-1 Thank you for the opportunity to comment on the Morena Corridor Specific Plan Draft EIR. In this letter I address the issue of the lack of Affordable Housing and the inappropriate housing being proposed. In addition, the vital area of water conservation is not being addressed correctly. The draft EIR also fails to address the need for improvements that need to be built entirely at developer expense and before occupancy is permitted.

These unsuitable and excessive developments will ultimately negatively impact our entire County. I will also point out the inadequacy of the EIR alternatives and the lapse of following the City's own environmental standards for consideration of probable future developments producing cumulative negative effects.

Too Much of the Wrong Type of Housing

BO-2 We recently experienced a massive Great Recession which largely resulted from the overhang of too much expensive housing and the unsustainable loans underwritten to finance them. The market for expensive housing first slowed, and then the inevitable fall began after short term interest rates rose from rising defaults and the collapsing derivatives. The bank's gambling with inadequately backed mortgage derivatives brought the entire financial system into near collapse.

Now we are once again building too much expensive housing. Several studies have shown that less than 10% of the population can afford to buy a home in our County. At the recent Board of Supervisor's Newland Sierra approval hearing, one analyst showed that existing over medium income housing satisfied 98% of the market. But only 14 % of the demand for medium and low income housing needs has been met.

Now, the Federal Reserve is planning significant interest rate increases. Derivative trading (speculation) has increased. Taxes and Inflation are starting to escalate, particularly in California. The market for higher end housing is reaching a peak - again. Rapidly rising pension costs are forcing cutbacks in government services.

The International Monetary Fund is predicting a *global* crunch on municipal financing in late 2020. By one expert estimate, the world market for credit, government bonds, mortgages and derivatives is \$347 trillion. Just a problem with 1% of these numbers in any part of the globe can produce another far greater crash.

The impact and increasingly likely financial collapse was most recently analyzed by the Bank of International Settlements ("BIS") located in Switzerland by their chief economist in the 9/3/2018 AFP Article "BIS warns of global economy risk crisis 'relapse'". The BIS is called the central bank for the central bank and closely monitors the international banking system. In its annual report it notes that the entire financial structure of the globe is increasingly "fragile". The BIS is concerned with rising interest rates, the lack of any remaining means to combat any future recession or banking failures,

BO-1 Introductory comment noted. The comment does not raise specific issues with regard to the adequacy of the PEIR, but raises general concerns related to a lack of affordable housing, water conservation, and public improvements. The comment also identifies inadequacies in the EIR alternatives, but does not identify specific concerns.

BO-2 Comment noted. This comment does not suggest an inadequacy in the analysis of the PEIR.

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and the deteriorating state of emerging country economies. One need only consider the Venezuela collapse, the problems in Argentina, the fall of Iran's economy, distress in Turkey, the failing banks in Italy, etc. in order to be concerned. Even China is experiencing a slowdown which stresses third world countries dependent on commodity economies. The predictions are for another bigger world contraction in the 2020-2021 timeframe.

For a City that prides itself on being an international proponent, why are the growing global problems that will spill over to us ignored? Why produce such inappropriate housing when it will produce even worse local effects? Too much of the wrong, over-priced housing is an existential threat to the entire County.

In a recent Union-Tribune article on the effects of just rising material costs, the question advanced was as to whether the construction high-rise boom may well be over in our City. Moreover, it pointed out that vacancy of rentals in general were rising and much more so in the new, already expensive high rises which is at vacancy levels exceeding 50%. Are we going to build at substantial taxpayer expense what is already a drag on the market and which threatens our entire economy? Small single family home owners produce the largest share of property taxes and are the bedrock of City finance. If the housing market tanks again (aided and abetted by this and like inappropriate developments), the property tax base will again shrink at a time City budgets are strained by pension costs, crumbling infrastructure, traffic congestion, and higher interest rates. Greedy bureaucrats will scream for more money to maintain themselves with the power, prestige and revenue they have grown accustomed to enjoy - at our expense.

With this and similar projects, we are preparing the groundwork for an even greater disaster than the last by building more inappropriate and environmentally unsound high-density market rate rental developments. Few can afford them except a small percentage of elite unmarried high-income earners attracted to this project's coastal properties with a commanding bay view (at the expense of existing homeowners who bought with the promise that the 30 foot limit would be maintained). And too many developers are chasing after this rapidly vanishing 10% demographic whose needs have already been more than met. The stage is not only being once more set for economic disaster, but a deeper, broader and larger catastrophe. In the last recession only the upper income earners and large corporations prospered. Is the system rigged again in their favor? Is it rigged to even produce greater depths for ourselves and greater income to the prosperous? After getting unsustainable building subsidies and concessions and having to strain our budget with having to build more of their infrastructure, will the builders of these expensive white elephants then demand rent subsidies to pay them magnified, assured high profits?

With bank bail-in measures in place for large bank "emergency", "crisis" use; why are we supposed to promote the probability of facilitating even worse problems? For example, a recent Citibank annual report repeatedly touts how the bail-in feature ensures their survival and prosperity. However, few citizens wish to see their savings and checking accounts seized and converted into diluted, unmarketable bank stock when they need their cash to survive.

The bald insistence that any type of housing will solve the Affordable Housing Crisis is plain wrong. If we need Affordable Housing in a crisis situation, the only logical and efficient means to do that is to build only Affordable Housing until the problem is solved. The old truism is that if you are in a hole, stop digging. Building more and more expensive housing just puts us in a deeper hole. Insisting that additional expensive housing is solely at the prerogative of the corporate builders of rental units is nonsense if the public is expected to give them subsidies, grants, high density approvals and concessions in building standards. All of these extras should only be available if they totally go for directly and efficiently building Affordable Housing.

Repeating Recent Mistakes

Mark Twain allegedly stated, "History doesn't repeat itself. But it often rhymes." Actually he

BO-3

BO-3 Comment noted. This comment does not suggest an inadequacy in the analysis of the PEIR.

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probably did not say precisely that. But he and a co-writer did write in *The Gilded Age: A Tale of Today*, "History never repeats itself, but the Kaleidoscopic combinations of the pictured presence often seems to be constructed of the broken fragments of antique legends."* Here, the rhyme and the biased *pictured presence* are too close to avoid the same or worse outcome as the Great Recession, especially if the burden of the infrastructure cost is passed onto already stressed low and middle income residents to the benefit of large already rich ("Gilded") corporation's and greedy (and Gilded) bureaucrat's visions for their "pictured presence constructed of the broken fragments of antique legends". Is this the "Tale of Today"? Mark Twain lived in an earlier age when government insider favoritism and corruption were rampant. Are we there once more?

Need for Affordable Housing and Its Infrastructure

- | | |
|--|---|
| <p>BO-4 If Affordable Housing is needed for young families, that should be built as a priority. After all, the generally accepted standard is that 62% of the new housing requirements are from normal population growth. Thus, logically the City should require that at least 62% of new housing be affordable. Of course, if only 14% of medium and low income housing is met and already permitted construction more than meets higher end needs, then 100% of new housing should be for lower income levels. Thus 100% of all new density bonuses should be for Affordable Housing for ALL citizens - and not just for civic employees as politicians often promote.</p> | <p>BO-4 The Specific Plan is intended to provide development at intensities that would allow for a range of housing affordability levels to be accommodated. Future development will be required to comply with affordable housing regulations in place at the time development is proposed. This comment does not suggest an inadequacy in the analysis of the PEIR.</p> |
| <p>BO-5 No in-lieu fees should be allowed to pass the buck for building truly Affordable Housing. All high density apartments must be built without the "in lieu" housing fee dodges or the purchasing of carbon credits for the added congestion which too often do not produce true offsets and are often not even built in our state or locale Of course for valuable coastal properties, investors will campaign hard for in-lieu fees to minimize their share of building affordable housing (except in much less valuable locations and always with many costs passed to taxpayers through tax credits, grants, expedited processing, concessions and preferential for them for building of parks and street improvements).</p> | <p>BO-5 Affordable housing requirements including allowances for payment of in-lieu fees are established in the City's Municipal Code, not the Specific Plan.</p> |
| <p>BO-6 As a further social equity reason, all the high density apartments should be occupant owned condominiums. For the last three decades, wages for middle and low income earners have stagnated with virtually no gain after subtracting inflation. Many studies have openly wondered about the continued prosperity of middle income married couples. The answers are three fold. First, both marriage partners typically worked. In some cases children work to supplement family finances. Second, they spent heavily on owning their own homes which both appreciated and avoided unproductive rent payments. Third, more and more children and their grandparents moved in together to share costs and avoid rent. Ten years ago, small homes and family apartments both averaged 2.2 residents. Today, apartment residency is still 2.2 while small homes now average 3.1-2.</p> <p>Home ownership is the only defense the middle income earners have to combat inflation. The homes increase in value above inflation, incomes remain essentially constant, but they pay off the diminishing mortgage with inflated dollars. The low income earners are shut out of the market as greed drives rent subsidies to rentals only. Inflation hits them cruelly.</p> <p>The homeowners in most states pay 20-25% of their gross income for housing. In California, the definition of "affordable" is typically set as 30% of average income with present interest rates a 10% down payment. But analysts for big developments are quietly assuming that a new home buyer will only have to provide a 5% down payment at present historically low interest rates, will not be subjected to more lending requirements and will commit 30% of their income. Now the Federal Reserve has rapidly increased interest rates, banks increasingly demand 10% down payments, and 35% of income is the new standard for sustainable home ownership (as calculated by developers). In most other states the standard of affordability is only 20-25% of their gross income. No wonder middle income families are fleeing the state - to survive.</p> <p>Of course, low income renters bear the major losses as rents, utility bills, and inflation continue to</p> | <p>BO-6 Whether future development includes ownership versus rental properties is beyond the scope of the PEIR. See responses to comment BO-4 and BO-5.</p> |

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	<p>increase. In order to allow middle income families to survive and prosper, home middle income ownership should to receive the bulk of subsidies and benefits for the taxes they pay. And new innovative programs for homeownership of lower income families and seniors are desperately needed as they have no protection from inflation and sharply rising utility bills. In a survey on 211 calls in San Marcos, 41% of the calls were about finding affordable housing. But a full 39% were concerning the inability to pay monthly utility bills. With power and water bills going up 5-8% a year with barely increasing income, the stress is approaching unbearable. Yet all the "innovative" programs are for cheaper made rental apartments favoring investors and all demand subsidies. If <i>expensive</i> housing is too <i>expensive</i> to build by private means, it should not be built. Why do rich corporations need corporate welfare when the citizens paying the bills are being impoverished?</p> <p>At present 62,000 homes already have building permits waiting on the sidelines. The County Board of Supervisors has signaled their intention to make concessions and expedite construction. So, are we about to have a flood of inappropriate, expensive housing which damages the community and crashes the market for exiting homeowners? Will the concessions include more grants and tax breaks to transfer costs to others and threaten our financial and environmental future? We need to carefully assess any of the "unintended consequences" of any BOS fine detail "incentives"?</p> <p>The Morena Corridor Project with its rentals and lack of truly innovative home ownership programs and its obsession for increasing the rental income of investors is plainly the wrong way to go. Over development of the wrong kind of housing <u>is</u> an existential threat to the entire State.</p> <p><u>Outdated Concepts on High Density Developments</u></p> <p>The relative inefficiency of these new developments for their excessive use of energy and water has not been addressed compared to small citizen homes. For example, small homeowners are putting in solar, not apartments with their insignificant space for panels. Without any significant power contribution of their own, apartment buildings will feed off the solar systems of small homeowners. SDG&E has stated that 80% of consumers' bills are for distribution, not power generation. So the only net gain for the small homeowner solar system is not to sell power to the utility, but by reducing their own power bills. The cost of any public solar projects must fairly rest on those who consume, but do not contribute. The City and the developers must pay for the homeowner power at the same net profits allowed SD&G - 10.5%.</p> <p>A study in Australia showed that contrary to outdated idea that claims that new high rises are more energy efficient than small homes are wrong. Even new more efficient buildings consume 20% more energy than single family dwellings. High rises need 24 hour security lights and elevators. Small home owners can turn down their thermostats or do without heating or air-conditioning. High rises cannot. Small homes do not need continuous ventilation.</p> <p>Transit villages may seem attractive, but they suck the life and economy of the most efficient and productive element of society - the vanishing middle class home owner.</p> <p><u>Water Conservation Needs More Attention</u></p> <p>Water is the <u>number one challenge to the global environment</u>. Africa, the Middle East and Southern California are hit especially hard. In fact, wars and instability in the Middle East are aggravated by the 800 year drought in that region.</p> <p>According to the State Constitution, water must not be wasted. Leaks are supposed to be the ultimate water waste. Now leaks are being eliminated - by small home owners. In studies done by the State in 2010, water losses from <u>leaks</u> in homes and apartments consumed from 12-17% of all of their water. After the last drought, small home owners cut these losses to 1-3% according to a recent water symposium of a panel of experts in CSUSM. Apartment leaks remained unchanged.</p>	
BO-7	<p>BO-7 For a discussion of energy use associated with the Specific Plan, see Section 6.9 of the PEIR.</p>	
BO-8	<p>BO-8 For a discussion of water use associated with the Specific Plan, see Section 6.14 of the PEIR.</p>	

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Individual meters on small homes make the detection and repair of leaks easy to identify and fix. Apartments use master meters with 6 to 42 apartments on each master meter making leak identification at best difficult. Under SB-7X individual apartment meters are supposed to be required at this time, but the City's WSA and the project's EIR are silent on the matter. Will they be high-density bonus "concessions"? Why were they not required in 2014 as the drought intensified? Was the extra cost to investors a factor? Was the rationalization that as the predicted drought continued the shortfall would be made up by rationing solely small homeowners such as desired by the Vallecitos Water District and Sacramento?

If individual meters are not required, then the issue is whether the tenants on a master meter are responsible for leaks and fined for waste or the investors who have failed to install individual meters on their new projects. Big money will push for no one being held responsible in their apartments and letting leaks, over use, and other waste go uncorrected.

Of course, the individual homeowner individual meter is expected to make up the difference after already sacrificing. Unrestricted water use then becomes a necessity for prosperity which will only be guaranteed for newer apartments with the increasingly ridiculous argument that they are more sustainable than small individual family homes. Then occupancy will soar at the highest cost new high density rentals. If apartments get rent subsidies, so much the better for corporate bottom lines as the rest of us suffer the added burden.

Waste Treatment disparities

BO-9 Currently, the waste treatment rates are based on water consumption during the wettest period of the year. The normally reasonable rationale is that individual users do not irrigate landscaping during these months and that landscaping irrigation does not require waste treatment. Then the waste treatment costs are spread around the year accordingly.

This metric and the rate setting process are biased and will no longer serve.

Southern California weather rain patterns are typically four dry years with one heavy year which brings up the average. During the dry periods there is little or no rain. In the previous century (one of the wettest in the last 12,000 years) the average rainfall was 19". Our annual rainfall now averages 10" according to the San Diego County Water Authority. The geological record points to the start of what will likely be a drought lasting at least 100 years, and it already is the worse in the last 1,200 years. If we are in more exceptionally dry series of years, extra irrigation is required during what was once a wet season to keep vegetation alive in the increasingly parched land. Thus waste treatment rates are being steadily inflated during a bad stretch of dry years and the formerly somewhat adequate standard for rate setting is becoming very unfair - to small homeowners.

Coming "Conservation" Measures

BO-10 Sacramento has dictated that only indoor residential water consumption is to be rationed in the future. Outdoor irrigation and all other uses (agriculture, commercial, government buildings, etc.) will not be rationed. Thus 100% of the rationing is to be applied to less than 10% of water use. As the water use by small home owners varies considerably as shown the City's own water studies, the State allows local water retailers to use any "reasonable" means to "estimate" individual outdoor irrigation use. This arbitrary standard is ripe with possibilities for abuse and corruption.

Outdoor landscaping was considered wasteful for the last thirty years in a falsely based slur against small home owners with their small plots of grass and flowers. The first and only effective measure to cut back on water was cutbacks on small home irrigation. Small homeowners sacrificed to get through the drought and the State and water districts allowed water in apartments and parks to be wasted. When the drought paused, the water did not come back to the previous levels as small homeowners kept up their sacrifices. The cities then gave this water to new developments and their

BO-9 Rates for wastewater treatment are beyond the scope of the PEIR.

BO-10 The comment does not raise an issue regarding the adequacy of the PEIR. However, it should be noted that the Specific Plan provides numerous policies encouraging the use of energy efficient and water conserving landscaping. Analysis of water use associated with the Specific Plan is provided in Section 6.14 of the PEIR.

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park's irrigation. The "temporary" "drought crisis" cutbacks were not true conservation, but permanent giveaways.

The homeowners who paid full freight for water and waste treatment they no longer (or never) used are not getting credit for their initial investments. Instead, new high density developments are taking over this capacity without paying for the transfer of rights. Here we see the real basis for the argument about new infrastructure not needed for new development. They take over the infrastructure that small homeowners had paid for and push them out with unfair taxes and soon with eminent domain.

Most apartment complexes for years have installed separate irrigation valves and meters at the urging of City politicians and Staff meaning that these individuals knew what will be required and still refused to insist on doing the same for individual meters. This facilitated a future means to further burden small home owners with an unfair portion of the rationing. The fines for exceeding monthly water rations will be up to \$500 a unit according to State law.

However, many small homes can be easily provided with a separate meter for their irrigation. City Staff "curiously" failed to require separate irrigation meters and valves for new single family home development. What is right under for rental apartment complexes should have been recommended for small homeowners.

A simple fix for most home owners is to purchase a separate meter for their connection to outdoor irrigation systems. Preferably the water departments will provide a meter at no extra charge to measure outdoor use. A meter costs less than \$150 with automated radio readout. Small homeowners should actually be provided such a meter free of charge as a small partial compensation for the loss of the water they paid capacity fees to get from the City.

Another needed change for fairness is monthly readings. All fines and restrictions are based on monthly bills. But the meters are often only read every two or more months. At a fine of \$500 a unit over a City mandated politically set ration, if a leak or a faulty meter develops just after the start of the reading cycle then fines of thousands of dollars can easily result. Hence more than a little attention to resolving this issue is appropriate. With automated systems and the importance of water, why has the water department doddled?

The City has suffered a series of embarrassing water department scandals from overcharging small homeowners. The ridiculous "explanations" that defied common sense, photographic evidence of non-readings, and the search for scapegoats have aggravated the public relations for both that department and for the City government's lack of proper, prompt attention. Will the City finally redeem itself by ensuring that all new high-density developments have individual meters for each residence?

Measuring actual differences rather than politically charged biased rationing schemes are necessary in our City. Why "guesses" for small homes and older apartment buildings must be used rather than take steps for greater precision. How can our increasingly biased and inept water departments be trusted?

Irrigation Issues for new Development

BO-11

High density apartment complexes need to have adjacent or enclosed parks to offset the dreary apartment living in shrinking expensive, small, plain living spaces. But to present an attractive facade for high-density transit villages, lush (and water hungry) landscaping is required amply filled with extensive grassed areas and treed parks. So Sacramento reversed course and decided that only indoor use needed to be cut back. Besides the spectacle of Hollywood stars suing to save their million dollar landscaping and avoid cutbacks was bad press.

BO-11 This comment seems to be raising an issue regarding the need for parks in the Specific Plan area. The PEIR addresses parks in Section 6.13.2. Additionally, this comment discusses water consumption in parks compared to small homeowners. Water supply is addressed in PEIR Section 6.14.3. The comment also raises questions regarding the Clairemont Town Center which is beyond the scope of the PEIR.

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	<p>Greenery will be likely politically restricted to adjacent high density developments for parks and open spaces (paid for largely at public expense) for the green open spaces and parks that are conspicuously absent from the proposed development plans <u>at this time</u>. Moreover, by state law small homeowners must hire expensive landscapers to file complex applications to plant or repair plots of landscaping as small as 500 sq. ft. and provide water budgets. By biasing acceptable standards for water consumption for plants in parks and recreational grassy areas versus small home plots, this process will be the means to minimize calculated landscaping requirements for high-density parks and open spaces while increasing calculated values for common home plants thereby shifting the burden of rationing to small homeowners. In the coming water shortage disaster, all high-density apartments' immediate irrigation can be shut off easily and completely (except for their nearby "city" parks) and cutting small homes even further.</p> <p>The City Staff is supposedly formulating a park policy that will determine where parks are needed conveniently after the large investor complexes are built. Will high density developments benefit as they are not building the parks themselves? The proposed Claremont Town Square conversion is notable for eliminating virtually all open space and almost all parking. Whose homes will be taken to build these nearby parks and amenities? Who will pay for the open space maintenance and building? How will this project's loss of shopping facilities be balanced? How can any shopping center survive without parking and a fraction of the shops?</p> <p>Of course, inadequate parks will become a crisis. As the drought continues</p> <p><u>False Claims on Infrastructure</u></p>	
BO-12	<p>Some transit village promoters state that the infrastructure has already been built so new infrastructure construction is not needed. That statement defies the most casual consideration. Obvious shortfalls in water, schools, medical access, parking, financing, climate change, and congestion must still be properly addressed and offset. You cannot increase the population of this area by over 500% along the northern end of Morena Blvd. without an already stressed infrastructure there failing completely. Yet these clear problems are waved through with only cursory investigation and justification. And that 500% does not begin to include the later enacted Transit Priority Areas even greater impact.</p>	BO-12 Analysis of impacts to public services (police protection, fire protection, schools, libraries, and parks and recreation) are assessed in Chapter 6.13 of the PEIR. The analysis is adequate for a program-level evaluation as there are mechanisms in place for future development to fund necessary services through Development Impact Fees. Water supply is addressed in PEIR Section 6.14.3.
BO-13	<p>Schools are a particular concern for this region. School attendance is going down in many parts of the City. Around the County, some schools are actually being shut down from reduced attendance and obsolescence. If new population is built with an eye towards Affordable Housing and young families required for a sustainable community, then new, updated schools are required. For over 6,000 new residences (with at least 13,000 added population) in this region a single older elementary school and a single older middle school are obviously inadequate unless the entire concepts of sustainable, balanced, Smart growth are to be abandoned and politically redefined into not Smart Growth, but Greedy Growth.</p> <p>Under the Classroom Reduction Act ("CRA") crowding is prohibited. The fluff promotions stress the vibrant community concept. How can a community be vibrant without children and up to date, uncrowded schools? Will eminent domain be applied? A new elementary school alone will require 13 acres - unless eminent domain is not available. Of course if the City decides to implement these Transit Priority Area developments, eminent domain for "transit redevelopment" property for schools for these investor residents (paid for by others), and even more high-rise housing (for private insider gain) are on the menu for seizure.</p> <p><u>Mitigation Measures Are Required, Not Optional</u></p>	BO-13 As discussed in Section 6.13 of the PEIR, future residential development that occurs in accordance with the Specific Plan would be required to pay school fees as outlined in Government Code Section 65995, Education Code Section 53080, and SB 50 to mitigate any potential impact on district schools. The City is legally prohibited from imposing any additional mitigation related to school facilities through implementation of SB 50, and the school district would be responsible for potential expansion or development of new facilities.
BO-14	<p>While the Draft EIR does mention the need for mitigation required in many areas, the EIR is still only advisory. They can be ignored or required or expanded at the pleasure of the City Council. The magnitude of the problems mentioned above require considerable mitigation and must be taken as</p>	BO-14 The mitigation framework contained in the PEIR is not advisory. Future projects will be required to mitigate project-level impacts consistent with the mitigation framework identified in the PEIR.

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	<p>minimum requirements for constructing such dramatic increases in density without significant harm to the community and the entire City.</p>	
BO-15	<p>Any and all mitigation measures such as for intersection improvements should be in place before any building or at least any occupancy is allowed. If the development is based on speculative consideration of possible grants or unfunded political promises or at best vague commitments by other agencies to build needed mitigations, the project is unsustainable and harmful. These largely mythical mitigation measures should not be included as justification for any planning and any portion dependent on such. Mitigation measures <u>must be built first and fully funded by investors who should be paying the full freight for their own infrastructure</u> as required by the State Constitution and Prop. 218.</p>	BO-15 With respect to infrastructure being developed to serve the proposed increased density, implementation of the mitigation framework contained within the PEIR provides guidance for future development to ensure that mitigation, including infrastructure improvements would occur as needed, on a project-by-project basis.
BO-16	<p>The record in our State and its cities of actually constructing specific needed mitigation projects devolves all too often to where the measures are never implemented or are only built if the cost is transferred onto the rest of the community indirectly through "grants" or other forms of raids on the State and City General Fund. Even when mitigation fees are collected promised for specific purposes, they are often diverted to the benefit of favored parties remote and disconnected from the developments. For example, in the North County where I live, extensive fees have been collected for parks from small family home developments. But not one park has been built in the Twin Oaks region. In the meantime, the community suffers the environmental and economic consequences while investors reap inflated profits for not implementing and not charged accordingly.</p> <p>The County Staff has ignored the repeated requests by the Twin Oaks Valley Sponsor Group for over four years for assistance in forming their new community plan and the need for new parks in the area. With the isolated Newland Sierra project now approved over the bitter objections of residents for the violation of virtually every environmental policy of the County General Master Plan, will a new park be built for <u>them</u> at extra taxpayer expense?</p>	BO-16 Comment noted. This comment does not suggest an inadequacy in the analysis of the PEIR.
BO-17	<p>Will the needed infrastructure from building bonuses be properly analyzed? Will the developer/investors pay for their added infrastructure and mitigation or acquire relief from other taxpayers? Corporations and their investors have the legal, moral and ethical responsibilities to maximize profit by charging all the market will bear - not to lower rental rates or pay any more than an overly developer friendly City government will assess. And to get as much as developer friendly cities and County governments are willing to divert to their benefit. Elected officials have the responsibility to say no and look for the true greater community good of citizens, not soulless corporations with their single purpose of increasing profits. They advocate lawfully transferring as much Affordable Housing costs onto others as they can. But legally the Affordable Housing must be met - and is not. Too much of density increases do not even consider truly Affordable Housing.</p>	BO-17 Comment noted. This comment does not suggest an inadequacy in the analysis of the PEIR.
BO-18	<p>Substantial fees have been collected for Affordable Housing yet only a pittance has been invested back into the community. By one report, \$287,000,000 has been collected and largely unspent. Many cities have been accused of transferring the funds to other uses. Should not <u>all</u> of the Morena corridor be Affordable Housing as the City has been long negligent in meeting its minimum SANDAG Regional Housing Assessment (RHNA) requirements? The latest much overdue investment much ballyhooded contains only a small portion of these funds and is amply supplemented through grants from outside sources and taxpayer funded subsidies. Where are all the Affordable Housing funds? How much remains? Has it already been spent? Again investors and developers are paid to minimize outlays and maximize profit. Will politicians make them pay their full fair share? So, how much money is in our City's Affordable Housing funds and why has it not be more used? Of course, silence will speak volumes.</p> <p>An extensive review of Affordable Housing in our City showed that over time, the stock of Affordable Housing has actually decreased. Investors for a variety of reasons have found ways to convert such units into market rate rental units. Why has not the City done a study of the reasons for the losses and enacted measures to ensure these losses no longer occur? Must we follow failed policies of the</p>	BO-18 This comment does not suggest an inadequacy in the analysis of the PEIR; however, future development will be required to be consistent with City regulations relating to the provision of adequate affordable housing and/or payment of in-lieu fees.

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	<p>past with glaring loopholes? If politicians push high density development to make more Affordable Housing, should they not be taking equally dramatic steps to ensure that more Affordable Housing is built and that it stays so. After all as the old saying goes: "It is not important what you make, it is what you can keep." Silence and inactions to pressing problems do speak volumes.</p> <p><u>Cumulative Impact, Density Bonuses and Transit Priority Areas</u></p> <p>BO-19 Note in the San Diego planning department's document "California Environmental Quality Act Determination Thresholds", the importance of cumulative Impacts and accounting for likely changes that will aggravate known problems is stressed. As the density bonuses can be greater than 100% (State laws proscribe only a <u>minimum</u> of 25%, and the City typically already allows 50% in portions of this plan), the spread of density bonuses and the unspecified added stress that will be allowed will invalidate all the mitigation measures with their politically ignored impacts.</p> <p>Note EIR's are typically only based on zoned allowable developments. Bonus densities are typically not required to file the needed EIR's that are required for every other development seeking higher density. It is an illegal workaround environmental law as it clearly violates State, Federal and even City laws and policies. But are "high density Transit Priority area" redevelopments are to be given a pass of their negative impact and inefficiencies that make them net community financial and environmental impairments? New developments would be nice if they were truly more sustainable, but they are not - just much more profitable.</p> <p>An added complication is that density bonuses allow the developer to demand "concessions". This plan appears to have been written for and by developers to get around the EIR process. Supposedly, individual water meters are required for each apartment, or will the developers gain relief through "concessions"? A tragic fire in London killed almost 100 people from a substitution of lower grade flammable siding. Will such closed door substitutions be allowed? As "concessions"?</p> <p>BO-20 Such bonuses must not be allowed unless their impact is specified, quantified and included in the alternatives considered. Bonus concessions must be publicly stated and defined before building permitting else the EIR process is further compromised and perhaps even obliterated.</p> <p><u>Undue Reliance on Solar Power</u></p> <p>BO-21 Note that the County and State have been considerably lax in their carbon permit projects for reducing Green House Gasses ("GHG"). We have lost or are losing almost all of our most substantial non-polluting power generation - atomic power by fumbling and special insider deals at the SDG&E and the California Public Utilities Commission - and failing hydroelectric power projects from the drought. Solar will not address the shortfalls in any significant manner. Note the image below of the San Diego County Water Authority Twin Oaks Water Treatment Plant. It has extensive dark blue solar panels deployed coupled with battery storage. But the battery and solar power coverage is inadequate to supply more than four hours of operation (if the day has not been cloudy). Diesel generators kick in to make up the difference in an emergency, but the plant has to run 24 hours a day and it must buy extensive power from SDG&E.</p>	<p>BO-19 The PEIR analysis accounts for the potential development of densities within TODEP areas, which is inclusive of the potential density bonuses associated with affordable housing; thus, the PEIR analysis is adequate as written.</p> <p>BO-20 Should development be proposed in the future with density bonuses for affordable units, they will be required to disclose potential impacts and incorporate mitigation identified in the PEIR.</p> <p>BO-21 Comment noted. This comment does not suggest an inadequacy in the analysis of the PEIR.</p>
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The promise of solar panels to reduce GHG is a modest offset at best, but far more expansive natural gas power must be used to fill in the gaps for most of the day - and all day when there are clouds or rain. The drive for sustainable non-polluting power production ultimately rests on either better financial sustainable storage technology that does not exist or effective carbon offset projects being built with the money where it is being collected. But they are not.

State politicians do not like this requirement as citizens can monitor the progress and ensure that their money is well spent and not diverted to insider use. California spends most of the money out of state and comingles funds with other states. To provide added protection against citizens and environmental group oversight, California passed a law that forbids FIA document requests. For example, some carbon offsets funds were built to buy hydroelectric power capacity from Portland. This money did not build any new green power generation capacity and thus did not offset new development's hunger for fossil fuel power. Further, the drought has reduced western hydroelectric power in general including Portland. We are receiving no environmental or economic benefit.

In fact, the County is being sued (successfully at this point) by the Sierra Club noting that the projects must be built in areas where the money is being collected. A court injunction to stop the environmentally and citizen unfriendly practice is being arrogantly defied by our County. The environment and efficient use of taxpayer dollars are not concerns - only insider profits.

Other Inadequate Carbon Offset Projects

BO-22

As another example of poor State planning -or over promising, one of the justifications for the State Water Project ("SWP") was that it would generate cheap power. But only 60% of the project was completed. Most of the vital power and flood control dams were never completed. The near catastrophe at Orville Dam resulted from not building the badly needed upstream Feather River Dam. Now the power required to transport SWP water is more than the too few dams produce. SWP is a net consumer of power - mostly from fossil fuel production. Moreover, if the water levels drop much further in Lake Mead and Lake Powell, the massive and key clean energy generation of hydroelectric power for Southern California will also be lost. We are losing clean energy faster than it being built. The outdated political sustainable energy policy with near total reliance on solar power (even with batteries) is obsolete and incredibly ignores the effects of climate change.

The carbon offsets are too cheap at present, and they eliminate responsibility for GHG in perpetuity. But none of the projects reduce GHG in perpetuity. Most either offer no benefit at all to the environment or fund projects that disappear in a matter of years. For example, one project was to reduce the release of methane gas from a pig farmer in Tennessee. How long will the plant last? Why are we paying for a project that is built without public transparency so far away? Was it ever built? What did it cost? The plant will wear out, but when and how will the investment pay off then in GHG reduction? Why did the State not decide to build plants for our vital State dairy industry? Is milk for our children not a concern? The program has been designed to permit corruption at the

BO-22 The overall strategy of carbon offsets is outside the scope of the project's PEIR; however, for an analysis of GHG impacts associated with the project, see Section 6.8 of the PEIR.

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expense of the environment and our community.

When the sun goes down, where will we get power? Will we finally literally be in the dark as we are about how money is being wasted for insider deals?

The outmoded ideas that solar power and carbon credits alone will produce completely clean energy is pushed by those who profit when it inevitably fails with the logical outcomes of such destructive developments such as high-density apartments increasing traffic congestion and GHG dramatically with time.

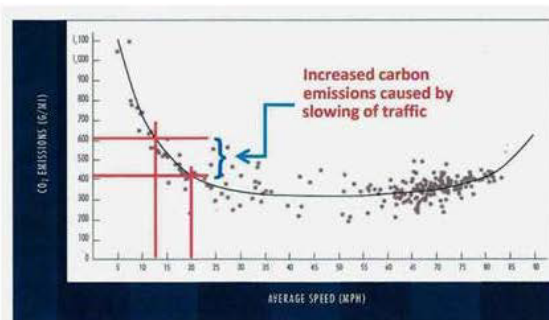
Transit Priority Areas

BO-23 One of the most destructive aspects of the environmentally perverted by special interests constructs are Transit Priority Areas. Here a destructive means of measuring pollution is introduced which seriously under quantifies GHG production of the changes. State law SB743 defines an "alternate means" of measuring GHG production by theoretical studies which ignore the realities of GHG generation, congestion and the value of healthy families and even human life.

Much of the road issues with the disputed Newland Sierra project in North County concern traffic and congestion. To measure congestion, Level of Service (LOS) is the most common metric. Now Vehicle Miles Travelled ("VMT") is promoted as an alternative Green House Gas (GHG) metric. However, in the case of Morena Blvd., both metrics fail to address the major issues. Specifically, both metrics fail to consider the effects of increased frequency of gridlock aggravated by increased congestion and poorly designed roads and interchanges.

BO-24 Traffic analysis of LOS considers the length of time to get into or through intersections. The levels vary from A (no time added from an intersection) to F (unacceptable time required on average). The designation of "F" stops short of identifying or quantifying the fact that some intersection waits go well beyond the minimum "F" level. Further, by its methodology LOS studies do not consider the influence of traffic disruptions from accidents, fire emergencies, truck spills, construction, etc. As the LOS metric is essentially capped, it does not consider the increased probability and sensitivity of a road to gridlock. Moreover, VMT is entirely insensitive to gridlock considerations. Yet every motorist acutely knows the consequences of gridlock and the increasing frequency and severity of the disruptions from congestion.

BO-25 Below is a graph of the GHG production of average cars versus vehicle speed. VMT does not address the issues of either reduced traffic speeds as well as gridlock. LOS analyses provide only the barest relation to true GHG production covering at best only normal idle time creation. Most analyses ignore them altogether.



BO-23 The comment states the analysis methods utilized "fail to consider the effects of increased frequency of gridlock aggravated by increased congestion and poorly designed roads and interchanges." The Transportation Impact Analysis (see Appendix B of the Draft PEIR) was prepared in accordance with the standards and methods set forth in the City of San Diego's Traffic Impact Study Manual and, therefore, provides adequate analysis of transportation impacts based on CEQA thresholds. It should be noted that intersection level of service operations and peak hour arterial analysis does account for roadway congestion and design features.

BO-24 Comment noted. This comment does not suggest an inadequacy in the analysis of the PEIR.

BO-25 Comment noted. This comment does not suggest an inadequacy in the analysis of the PEIR.

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	<p>Further, GHG studies fail to consider the severe consequences on GHG of traffic calming. Traffic calming is supposed to produce safer conditions. However, the calming is produced by introducing more traffic hazards and the expectation that drivers will slow down in response to the added hazards. The added GHG of such measures are universally omitted from GHG computations. Roundabouts are particularly dangerous to pedestrians and bicyclists even though they slow intersections from 30-35 mph to around 15 increasing GHG by over 50%. Free flowing 35 roads with computer controlled traffic moderated signalization are the most efficient from GHG generation. Travelling 80 mph on a freeway produces as much GHG as going 20 on a City Street.</p>	
BO-26	<p>San Marcos built such a traffic light computer controlled system years ago along one of the most congested streets in the State; San Marcos Blvd. Staff ascribed a low figure for the value of lost time from congestions and partial offsets from the additional GHG from just idling. Yet, they found that every dollar invested in the project paid back eight to the community in 20 years. With increased gas taxes, the payback is becoming much greater. Now Staff is recommending conversion of San Marcos Blvd. with markedly increased congestion for motorists and hazards to bicyclists. The highly successful signalization will be largely eliminated. The road will split the community with a long fence with no pedestrian crossings for over a quarter mile. Pedestrian wait times and the interruption of traffic were never considered except to note that more than one pedestrian bridge was needed. Staff claimed the changes would change the road into a "complete street", but never considered that the changes would be a net negative to pedestrians, bicyclists, motorists. They did not consider mass transit at all. Of course there are no plans to build any pedestrian bridges in the City despite claims that they will make San Marcos more walkable. The truths are that they will require more needless walking, are less friendly to pedestrians, generate more congestion, and render bicycling a much more dangerous and inconvenient alternative. The expanded width of the roadways also will reduce parking needed for its now struggling Restaurant Row and access to the nearby government buildings.</p>	BO-26 Comment noted. This comment does not suggest an inadequacy in the analysis of the PEIR.
BO-27	<p>Forgotten in these studies is the coming increasing magnitude of carbon offset "fees". The fees can be an oppressive tax for a greedy government. The State can raise the "reserve" price of permits at any moment. It has an unstated, but large, motivation in promoting GHG production - to increase taxes. One of the most effective means of <u>increasing</u> GHG production is to create congestion and gridlock as most GHG are from automobiles.</p> <p>Thus we have the contradictory statements that roundabouts, reduced number of lanes, and intermixing pedestrians and bicyclists with cars are both safer and environmentally friendly when they are in fact neither. Citizens have expressed a greater interest than their governments in implementing more environmental friendly free flowing roads and increasing the safety of bikers and pedestrians through traffic mode segregation.</p>	BO-27 Comment noted. This comment does not suggest an inadequacy in the analysis of the PEIR.
BO-28	<p>That does not mean that both LOS and VMT metrics should not be analyzed, but they do not clearly address and quantify the major road issues of a heavily impacted road such as Morena Blvd., the surrounding community, and the vital, often gridlocked Interstate highways.</p>	BO-28 See response to comment BO-23.
BO-29	<p>The proposed Corridor projects have unique and more significant GHG and traffic congestion problems than most developments. The heavily impacted Interstate 5 gridlocks at the slightest disturbance. An accident here does not allow any alternate routes.</p> <p>The clear alternative is to evaluate gridlock and congestion and learn from experience. CALTRANS data for Interstate 5's past gridlocks can be easily accessed and analyzed using typical traffic flow rates correlated with the backed up traffic that resulted. The average time to clear accidents and the number of cars and their slow pickup of speeds can be easily determined to a good degree using only a spreadsheet. The increase of GHG can become a simple calculation from a graph like the one above.</p>	BO-29 The Preferred Plan roadway network does include additional network connections that may be used as alternate routes. The comment proposes alternative methods to evaluate transportation impacts. The Transportation Impact Analysis was prepared in accordance with the standards and methods set forth in the City of San Diego's Traffic Impact Study Manual and, therefore, provides adequate analysis of transportation operations.
BO-30	<p>The Clairemont Mesa Road interchange is another challenge. There are few entry points for the</p>	BO-30 For a discussion of project-related traffic impacts, see Section 6.2 of the PEIR.

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	<p>massive population explosion proposed for this region. For this Corridor project only a single narrow, congested two-lane road (Denver Street) accesses Clairemont Mesa. Gridlocks here will be frequent and extensive. GHG production will soar.</p>	
BO-31	<p>Further, Denver Street is to be the primary collector. It runs right in front of a grammar school. With parking at a premium, cars will line these streets making them particularly dangerous for children and bicyclists. Why is this street not properly analyzed? Why in fact have no traffic analyses been done to date when this is obviously a major issue with citizens? Will there be any more public meetings once the results are in? Will the plan go forth with the public so completely deprived of such vital information?</p>	BO-31 Denver Street from Clairemont Drive to Ingulf Street and the intersections of Denver Street/Clairemont Drive and Denver Street/Ingulf Street were analyzed in accordance with the standards and methods set forth in the City of San Diego's Transportation Impact Study Manual. The remainder of the comment is outside the scope of the PEIR and/or does not suggest an inadequacy in the analysis of the PEIR. The public will be advised of all hearings on the project and will be invited to speak in favor, or in opposition of the project.
BO-32	<p>Another problem is the Morena Blvd. itself. The traffic that goes south must come back north and vice versa. Common sense. Reducing the four lanes to three means a marked increase of congestion - and GHG production. The plan further increases GHG by transitioning from 4 to 3 lanes and back again. We have traffic lights on busy on ramps to reduce the congestion of merging traffic, so must we introduce congestion? Must common sense and the lessons of hard experience now be banned from the government halls and its deliberations? Reportedly, the City Staff have thrown in the towel on that obvious nonsense, but why was it promoted in the first place. The answer appears to be that citizens angered by these patently false assertions have protested more than anticipated. What else has so far escaped public notice particularly in closed door deals?</p>	
BO-33	<p>There has been <u>speculation</u> that Mass Transit and electric automobiles will be the answer. Hardly. First, the short lived batteries (even solar cells) morph into costly, toxic waste as they use zinc, lithium or lead. Second, electric vehicles are not pollution free. The power from solar and other "green" sources are notoriously unreliable and even more batteries are needed adding to the cost both financially and environmentally. Third, most utilities and new developments cannot even with distorted metrics be really green. Too often heavy polluters claim to be "carbon free" simply because they pay carbon offset fees. These are essentially licenses to pollute and the charges are far from adequate.</p> <p>Government and Special Interests have displayed unlimited interest in transferring the limited wealth of its citizens to itself. Our State has never tolerated a loss of tax dollars. Too much of its tax base is centered on automobiles. If that shrinks, the state will simply set the carbon offsets higher. Historically the rises in fees more than compensate for the "losses". Thus the already discussed ideas of taxing all cars on a per mile basis making electric cars a non-solution.</p> <p><u>Deficiencies of Mass Transit</u></p>	BO-32 Morena Boulevard and the intersections on Morena Boulevard were analyzed in accordance with the standards and methods set forth in the City of San Diego's Transportation Impact Study Manual. The remainder of the comment is outside the scope of the PEIR. The public will be advised of all hearings on the project and will be invited to speak in favor, or in opposition of the project.
BO-34	<p>Mass Transit has also been determined to be an expensive and inefficient solution to transportation needs. A 20 mile trip in a car will cost about \$11 and take perhaps 30 minutes. At face value, a bus trip costing \$5 is a good deal until one considers that the \$5 covers only 20-25% of cost. The rest comes from regressive taxes and subsidies. The true cost is thus \$20-25 and will take a total average round trip total of 80 minutes as wait times for bus and trolley schedules average 15-30 minutes between transports. That ignores the time spent in walking a half mile to the station through neighborhoods that may not be safe at night and the weather might be far from accommodating. A simple medical office visit will often take half a day or more by bus. The substitution of Mass Transit for automobiles reduces health care access. Less than a half day trip by car becomes a full day away from work and lost wages and their taxes to pay for the inefficient busses.</p>	BO-33 Comment noted. This comment does not suggest an inadequacy in the analysis of the PEIR.
BO-35	<p>The Sprinter line in North County cost almost \$1,000,000,000 to build (including Federal taxpayer subsidies). Outside estimates place the \$5 fares at covering only 4-9% of the total cost to taxpayers. Thus a \$5 fare on the Sprinter actually costs anywhere from \$55-100 factoring in all the State and Local added tax burdens and subsidies. SANDAG promoted this and other mass transit projects years ago as a means to reduce auto ridership by 30%. The eventual figure came out closer to 0.1%. Moreover, most trips simply are not on bus routes and routes are steadily being reduced from lack</p>	BO-34 Comment noted. This comment does not suggest an inadequacy in the analysis of the PEIR.
		BO-35 Comment noted. This comment does not suggest an inadequacy in the analysis of the PEIR.

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<p>of ridership. Recent laws make reduction of unprofitable and ill utilized bus routes permanent. To be an effective alternative to cars, busses and trolleys will also have to run 24 hours a day. Costs will again soar and needless GHG will be added for insignificant benefit more than offset by inefficiency.</p> <p>BO-36 As a further note, the diesel-driven Sprinter ridership is notoriously low as evidenced by the virtually always nearly empty double car trains. For almost six months, the Sprinter was once down for faulty brakes. During that down time, regular street busses carried the load. During those months the diesel fuel bill for the North County Transit District <u>decreased</u> evidencing the reduction of GHG of common busses over the light rail. Light train GHG is not being properly assessed. Why <u>always</u> use two cars always used when one is more than enough?</p> <p><u>Congestion Kills</u></p> <p>BO-37 In an interesting experiment test subjects were given \$40 a week to spend any way they wanted. They only had to identify how they spent it. The first week they bought a physical item. Every week thereafter, they spent the money on time saving services. Citizens value their time even if politicians and bureaucrats do not. All we really have is a limited time on earth. We use prisons as a punishment - the reduction in the freedom of time to do as one wishes. This factor helps explain the frustration and even (well deserved) hatred of traffic congestion.</p> <p>Congestion is <u>a loss of life</u> that Mass Transit cannot and will not fix. Allowing congestion to go untreated is often seen by increasing number of citizens as indifference to the quality of life to drivers who have to commute great distances to get to their work from a more desirable residence where there are better schools, less crime, lower taxes, affordable housing, more space, and more freedom of travel. They already sacrifice and then they pay considerable in gas and automobile taxes, and much of their money goes into Mass Transit which does not help the vital roads. Then they are asked to sacrifice more in pure wasted time (life). It explains why congestion, roads and traffic relief are high up in priority in citizen minds. The indifference of politicians who use bait and switch and broken promises appears to them as betrayals and worse - the complete devaluation of their lives for what appears to them as purely political and insider gains.</p> <p><u>Outdated False Environmental Positions</u></p> <p>BO-38 Current technological are outdated even these ancient assumed advantages of Transit Priority Areas even before they are being built. As one example, motorized scooters are becoming prevalent and popular. They are faster, more dangerous and a preferred means of traveling urban centers - much faster and easier than walking. The touted health benefits of walking are disappearing in the desire by citizens to maximize their time, energy and freedom on other activities. Mass transit is being shunned as travel time even to other stops takes twice as long as cars.</p> <p>Furthermore, the emergence of Lift and Uber is killing the justifications of busses and trolleys. In the few high-density developments so far, the reduction in VMT has not materialized. In fact, because of Uber and Lift, the VMT are more than doubling. Citizen prefer the time savings of these services and are willing to pay extra for the freedom and time savings. With these services a hired car must come into the development for pick up from a standby position and then drive them to the desired destination. Then it returns to its standby location. When the citizen wants to return home, another hired car drives to from their standby position to the original rider's destination point and returns the rider to the development. Then the driver returns to his/her standby point. Of course, when the new taxes on VMT kick in, the State will profit mightily from the VMT taxes and carbon offsets.</p> <p>Portland invested heavily in Mass Transit, much more than anywhere in California. In the end only 4% of the trips taken by residents were by Mass Transit. Even with SANDAG's absurd failure with the Sprinter, it stubbornly continues to seek higher ridership with even more costly investment in Mass Transit, after which they still expect will never reach even 1% after over thirty years of trying in North County and with the wastage of considerable additional taxpayer dollars.</p>	<p>BO-36 Comment noted. This comment does not suggest an inadequacy in the analysis of the PEIR.</p> <p>BO-37 Comment noted. This comment does not suggest an inadequacy in the analysis of the PEIR.</p> <p>BO-38 Comment noted. This comment does not suggest an inadequacy in the analysis of the PEIR.</p>
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Our electric powered trolleys used to be an efficient low-GHG until its major clean energy source (San Onofre) was shut down because of awkward business blunders (for which costs Sempra has continually attempted to pass onto consumers.). Now the trolley will lose Hoover Dam's clean power as well as the drought levels are dropping to where the turbines will not operate. Nevada has just built to drain every last drop of Colorado River water even after California consumers lose all of the available water as the dam construction does not allow the last 10% to flow.

Nevada only has a small share of Colorado River water (300 maf), but it consumes 450 and returns 200 of sewage waste water. As has been observed by those in the know of water issues, "Not everything that happens in Las Vegas, stays in Las Vegas."

Adding insult to injury, top State figures have begun to float the idea that we can afford either mass transit or roads, but not both. And mass transit is supposedly more modern and cleaner and to be promoted. Yet these same officials are telling taxpayers that the new gas tax is to build long neglected roads. Are we being subjected to still more bait and switch tactics? Mass transit in California with its adverse topography is a dismal failure, and the steadily shrinking middle class depends on small homeowners with freedom of transportation. Why is this broken mass transit concept being constantly pushed?

The answer is money. Transit Priority Areas built on the concepts of Mass Transit has major implications on making investors rich, very rich - at citizen and community expense.

One should also note that only a fraction of destinations for real life families can be served by mass transit, walking, or biking. such as for doctor appointments, kids sports, business trips, local service businesses, manufacturing jobs, dual provider families who seldom have both jobs in the same location, better schools, etc. Note the most prized apartment amenity for higher end income earners is parking.

Healthy Homes are not "Urban Village" Apartments

BO-39 TPA advocates insist that Millennials prefer smaller apartments and that most are single professionals. That makes the statement that apartments are *multifamily* housing an oxymoron. Millennials do not prefer small apartments - that is just all they can afford. While they lived through the Great Recession and saw their parents struggle and single family homes lose market value, now they are seeing own their own homes a necessity for having a healthy family and not be hit with rising rents with nothing to show for their money. It has been the bedrock of middle income finances (and City finances).

One of the great misconceptions is that Affordable Housing is a major barrier to having more professionals move into our state. That is actually less than half true. The other half is that they mostly want affordable suburban homes. They are marrying later in life and are producing better marriages. Plus, they want a healthy environment for children. The City's very slow response to the Hepatitis B epidemic, the unwillingness to address homeliness until pushed hard, the wastage of \$30,000,000 on the new City office buildings, the poor roads, higher taxes, soaring utility bills and the water meter scandal, indifference to congestion, etc. all make this state untenable and uninviting despite its superior climate, natural wonders and beaches. As a result, the state is rapidly losing healthy families who are being driven out by a State which substitutes addressing the reality of these issues with posturing.

Conclusion

BO-40 This plan is a substantial net negative to the environment. The project and its inadequate EIR should be withdrawn and the project completely reconsidered. We have an Affordable Housing Crisis, not a Housing Crisis. Common sense measures to curtail the severe water shortage crisis are ignored. And the housing and outdated development narratives ("the Kaleidoscopic combinations of the pictured

BO-39 Comment noted. This comment does not suggest an inadequacy in the analysis of the PEIR.

BO-40 Concluding comments are noted. While the commenter states that the EIR is inadequate, the comment does not specifically state what portions of the PEIR are in adequate.

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presence often seems to be constructed of the broken fragments of antique legends") are being pushed onto the community which is required to pay the bills for someone else's feast - truly a case of the "Gilded" and a "Tale of Today".

I request a written response to this letter and that it is published with the final EIR draft.

Respectfully submitted,



Michael D. Hunsaker
Retired Engineer and Technical Program Manager
President, Twin Oaks Valley Property Owners Association
Termed out tax representative for the Citizen Bond Oversight Committees for the Dehesa and San Marcos Unified School Districts
Present taxpayer representative for the Citizen Bond Oversight Committees for the Palomar Community College and Fallbrook High School Districts
*For more insightful research on this Mark Twain quote, see <https://quoteinvestigator.com>. It has a delightful wealth of information on the pervasiveness of this historical trend.



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LETTER

RESPONSE

From: Mike Hunsaker
To: [PLN_PlanningCEQA](#)
Subject: Comment letter on the Morena Corridor Specific Plan EIR Project No. 582608/ SCH 2016101021
Date: Monday, October 01, 2018 4:50:45 PM

Dear Ms. Malone,

BO-41 The citizen Morena Community Planning Group and the Linda Vista Planning Group both unanimously voted against the proposed Morena Specific Plan and published detailed objections to the plan. While the belated addition of the requested multi-modal transit bridge to improve public access addressed a major concern, all the other matters of exceeding the 30 limit on building heights in this area, increased traffic congestion, etc. still remain unresolved and make the plan totally unacceptable.

Even with the inclusion of the bridge, this project is not acceptable unless it can be clearly shown and required to be built without burdening the community before occupancy. They must be entirely paid for by the developer who will receive substantial economic benefits from the ability to build densely in such a prime coastal location while severely impacting the community. They must share the benefits to the community and at least not harm and burden it financially and environmentally.

Please respect the community positions that has been examined and formulated over an intensive two-year period. Do not burden us with developer/investor infrastructure impacts and expenses.

I request a written, detailed and well considered response.

Respectfully submitted,

Michael D. Hunsaker

Retired Engineer and Technical Program Manager
 President, Twin Oaks Valley Property Owners Association
 Termed out tax representative for the Citizen Bond Oversight Committees for the Dehesa and San Marcos Unified School Districts
 Present taxpayer representative for the Citizen Bond Oversight Committees for the Palomar Community College and Fallbrook High School Districts



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BO-41 As noted in Section 6.2, Transportation and Circulation, of the PEIR, the Specific Plan identifies policies to coordinate with Caltrans to provide bridge connections from the Specific Plan area to Mission Bay Park and improve cyclist mobility over the Clairemont Drive/East Mission Bay Drive and Sea World Drive/Tecolote Road Bridge. Ultimate construction of a bridge would require further feasibility analysis including site-specific environmental analysis and engagement with the community at the time a specific project is proposed.

Letter BP

From: Irene Magallanez
To: [PLN PlanningCEQA](#); [Prinz, Michael](#); [CouncilMember Lorie Zapf](#)
Subject: Morena Corridor Specific Plan, Public Review Draft
Date: Monday, October 01, 2018 5:18:57 PM

Irene Magallanez
 5109 Hilda Rd
 San Diego, CA 92110

Rebecca Malone, Environmental Planner
 City of San Diego Planning Department
 9485 Aero Drive, MS 413
 San Diego, CA 92123
PlanningCEQA@sanidiego.gov

Hon. Lorie Zapf
 San Diego City Council Member, District 2
 202 C Street
 San Diego, CA 92101
loriezapf@sanidiego.gov

Michael Prinz
 San Diego Planning Department
 1010 Second Ave., MS 413
 San Diego, CA 92101
MPrinz@sanidiego.gov

Re: Morena Corridor Specific Plan, Public Review Draft, June 2017 Comments concerning proposed specific plan

- BP-1 It was with great anticipation that I awaited the release of the Public Review Draft concerning the Morena Corridor Specific Plan and with great disappointment after reading it. After having sat through many Linda Vista Planning Group and Ad Hoc meetings and listening to the recommendations made by these groups, it appears that the city either did not want to or are not willing to listen to the advice of the constituents of the Linda Vista community.
- BP-2 The city has decided that the height limit for the Overlook Heights area of the Linda Vista district should be raised to not 60 (sixty) feet by discretion as was first suggested by the developers but raised to 45 (forty-five) feet by right and 100 feet by discretion. This is well above the current 30 (thirty) feet by right and 45 (forty-five) feet by discretion near the Tecolote station. Also, in the Morena station area the height limits rises to 45 (forty-five) feet by right and 65 (sixty-five) feet by discretion. With the decrease of traffic lanes on W. Morena Blvd and the increase of dwelling units to 109 (one hundred nine) per acre in the Tecolote station area and 73 (seventy-three) in the Morena station area, the increase in traffic would sorely test our roads in the area. This increase in traffic is a given when taking into consideration the number of units proposed. However, to date we have not seen nor been notified of a traffic study being done or completed to address these issues.
- BP-4 In addition, a study has not been provided by the city in regards to resident mass transit ridership. This increase of residents in the area with vehicles would greatly increase the amount of traffic in an area with very limited vehicular access and parking.

- BP-1 Introductory comment noted.
- BP-2 Comment noted. This comment does not suggest an inadequacy in the analysis of the PEIR.
- BP-3 For a discussion of traffic-related impacts, see Section 6.2 of the PEIR. Additionally, a transportation impact analysis was prepared for the project and circulated for public review with the PEIR. See Appendix B of the Draft PEIR for the traffic analysis.
- BP-4 The City recognizes that it cannot be guaranteed that future residents will take advantage of transit; however, planning for high-density residential development near high-quality transit is a focus of the City General Plan City of Villages Strategy, the City's Climate Action Plan, and is consistent with SANDAG strategies identified in The Regional Plan.

LETTER

RESPONSE

<p>BP-5 In late September, we received a letter dated September, 17, 2018 from Mike Hansen, Director of the Planning Department for the City of San Diego. In that letter, he states that Planning Department “values and appreciates” our input and as such the following changes would be made to the draft of the Morena Corridor Specific plan. These changes are as follows:</p> <p><!--[if !supportLists]-->1. <!--[endif]-->The plan would include language supporting a pedestrian and bicycle bridge between Mission Bay Park and the Specific Plan area over the I-5 freeway.</p> <p><!--[if !supportLists]-->2. <!--[endif]-->The plan would be amended to retain four lanes in the segment of Morena Boulevard from Ingulf Street to Knoxville Street including two northbound lanes, two southbound lanes, and left-turn pockets at intersections.</p> <p><!--[if !supportLists]-->3. <!--[endif]-->The Transit-Oriented Development Enhancement Program within the plan will be amended to remove the ability to seek a maximum height of 100 (one hundred) feet in the Tecolote Village District and to remove the ability to seek a maximum height of 65 (sixty-five) feet in the Morena Station District through a future Planned Development Permit process. The proposed “by-right” height limit of 45 (forty-five) feet will remain.</p> <p>BP-6 Let us hope that these changes will truly stay in place and not be made in the midst of an election year where our City Council member is running for re-election. As such, these changes have brought hope to this process.</p> <p>While we believe in smart development with the constraints of the area, we are very aware of the changes that the coming trolley will bring. Please keep in mind the needs and capabilities of then areas impact.</p> <p>Thank you for your time consideration in this matter.</p> <p>Sincerely,</p> <p>Irene Magallanez</p>	<p>BP-5 These statements accurately reflect the language included in the September 17, 2018 letter from Mike Hansen. This comment does not suggest an inadequacy in the analysis of the PEIR.</p> <p>BP-6 Concluding comments are noted.</p>
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LETTER

RESPONSE

Letter BQ

From: Joseph Armeanio
To: [PLN_PlanningCEQA](#)
Subject: Morena Corridor Specific Plan PROJECT No.: 582608 / SCH No. 2016101021
Date: Monday, October 01, 2018 10:10:51 PM

BQ-1 I own a lot included in this study. The zoning classification is incorrectly displayed in the study.
APN 425-781-24-00
Zoning is CC1-3
It is shown as recreational property in future 6.3-2, this is incorrect.
Joseph Armeanio

BQ-1 Figure 2-3, Existing Zoning, correctly displays the referenced parcel as CC-1-3. Figure 6.3-2, Existing Noise Contours, displays existing land use, not existing zoning.

LETTER

RESPONSE

Letter BR

From: Anthony Cresap
To: [PLN_PlanningCEQA](#)
Cc: [Malone, Rebecca](#)
Subject: Project Name: Morena Corridor Specific/ Project No.: 582608 / SCH No.: 2016101021
Date: Tuesday, October 02, 2018 12:18:31 AM

To: PlanningCEQA@sandiego.gov and Rebecca Malone, Environmental Planner, City of San Diego Planning Department

Dear Rebecca Malone and City of San Diego:

- BR-1 I am submitting this comment on the Draft Morena Corridor Specific Plan Program EIR ("PEIR"). I am concurrently submitting comments in a separate e-mail letter on the Specific Plan itself. I comment as a resident of the Bay Park neighborhood, located uphill of, east and north of the Specific Plan area.
- BR-2 The essence of my comment is that I think the EIR needs to have a supplemental and detailed visual impacts analysis in order to understand the impacts of the development.
- BR-3 But my underlying concern may be different from others in the community: I am most concerned that complaints about visual impacts from increased building heights will be used as a basis to block opportunities for low income housing in the Specific Plan area - including opportunities for persons recovering from homelessness or with special needs, which is a high priority of the City. These populations depend on public transit, and need to live near it; additionally, housing that can serve them often needs to be at higher density for financial viability. Meanwhile, the City's Housing Element makes development of housing for persons with special needs a high priority.
- BR-4 I am commenting on one section of the Draft PEIR: Impact Analysis, Issue 1: Scenic Vistas or Views and Issue 2, Neighborhood Character(pp. 6.7-2 – 6.7.5).
- What the PEIR Discusses. The PEIR notes that discretionary review that will take place at permitting stage would analyze such impacts. But the PEIR also finds there could be significant visual impacts to public views of Mission Bay, the Presidio and even the San Diego River due to building height increases to 45 feet within the Linda Vista Community Plan portion of the Specific Plan area. The PEIR also addresses build-out of allowable maximum building heights under the Transit Oriented Development Enhancement Program (TODEP) (particularly in the Tecolote Village District and Morena Station Districts) and proceeds to conclude that "potential impacts related to public views associated with build-out of Specific Plan land uses within the Linda Vista portion of the Specific Plan area including implementation of the TODEP would be significant." The PEIR draft further concludes that "A significant impact related to neighborhood character would occur as a result of future development within the Linda Vista portion of the Specific Plan area due to increased heights and development intensity that could conflict with existing neighborhood character." (Draft PEIR, page 6.7-5.).
- BR-5 The document also does not analyze building height impacts in the Clairemont Mesa

- BR-1 Comment noted.
- BR-2 The analysis of visual effects and neighborhood character was completed at a program level of analysis because the design of specific developments are not known. However, the potential density and heights of future development was assumed to be the maximum allowed with a Planned Development Permit within the Morena Station and Tecolote Village districts. This comment does not suggest an inadequacy in the analysis of the PEIR. The analysis concludes that significant and unavoidable impacts to scenic vistas/public views and neighborhood character would occur as a result of build-out of the Specific Plan. The PEIR would provide a framework for future projects to undergo streamlined environmental review by tiering from the analysis in the PEIR.
- BR-3 This comment restates the analysis and language included within the PEIR regarding impacts associated with scenic vistas or public views.
- BR-4 The Specific Plan does not propose any changes to allowed building heights within the Clairemont Mesa portion of the Specific Plan area; thus, the PEIR concluded that implementation of the Specific Plan would not result in visual impacts within that area.
- BR-5 Contrary to the comment, the PEIR conclusions of significant and unavoidable impacts provide a benefit to future discretionary projects that would tier from the PEIR as the potential for a significant visual impact requiring preparation of an EIR for individual development projects could be avoided. Instead, future discretionary projects could tier from the analysis in the PEIR. Visual impacts of future development would still need to be addressed by demonstrating consistency with applicable policies in the Specific Plan and any other applicable City regulations protective of views and scenic resources; however, the burden of requiring individual projects to demonstrate a less than significant impact to visual resources would be eliminated.

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<p>Community Plan portion of the Specific Plan (which would include the neighborhood of Mid-Coast Light Rail Trolley Station at Clairemont Drive), ostensibly because, as the PEIR points out, no changes are currently being proposed to the existing the 30-foot height limit in that area. (See pp. 6.7-2 – 6.7.5).</p> <p>BR-6 <u>The Discussion of Visual Impacts Is Inadequate.</u> The draft PEIR’s visual impacts analysis is insufficient. The discussion delays analysis of visual impacts to a later point in time and therefore, at least as to the visual impacts, the discussion is general only and lacks any attempt at empirical assessment. The conclusions of impact are thus essentially only guesswork. The simple solution is to undertake a formal study that includes professionally prepared visual simulations that illustrate how new buildings could appear in the landscape from the vantage points from different locations around the impacted neighborhoods. A strong visual assessment study is thus in order. Absent additional visual analysis, the discussion of height impacts is not meaningful and is not supported by substantial evidence.</p> <p>BR-7 <u>Solution is to Prepare Professional Visual Impacts Assessment.</u> I recognize that the PEIR is a program-level document, and that CEQA authorizes such planning. I also acknowledge that, from a practical standpoint, impacts of specific projects are best addressed in detail at the discretionary permit stage. But, in this case, the Specific Plan does already provide enough information and details on heights and neighborhood and urban design to support a meaningful visual impacts analysis. We already have some indication of how taller buildings might appear in the viewshed – therefore, some attempt can be made to assess at least what kind of impacts can occur – e.g., from specific sample vantage points, what specific landscape features could be newly obstructed, whether existing buildings already block views, and so forth. This may stimulate a Specific Plan policy with criteria. In short, it is not necessary or helpful in this case to delay meaningful visual impacts analysis until specific development projects are proposed. We can at least have some idea what impacts can be, now.</p> <p>BR-8 <u>Fears of Significant Visual Impacts Seem Exaggerated.</u> As a neighborhood resident, I have considered what the built-out Specific Plan landscape of taller transit-oriented developments surrounding the 3 trolley stations (Tecolote, Morena, and Clairemont) could appear from vantage points in the neighborhoods east and uphill of the Specific Plan areas. To be fair, I predict that such developments will be visible from the uphill neighborhoods -- even though existing developments will block much of the view of any newer buildings. That said, I remain highly skeptical that such build-out will destroy the community character or, for that matter, significant obstructions to public views of Mission Bay and other important local landscape features. In fact, I predict that with mitigation, impacts can be made minimal, even with taller structures such as those allowable potentially under the maximum height development under the TODEP.</p> <p>Yet, the PEIR has already concluded, without undertaking a meaningful visual impacts analysis, that the transit-oriented developments in the Linda Vista area will have a significant impact on neighborhood character; the PEIR otherwise just kicks the “impacts analysis review” can down the road by delaying visual impacts analysis to project development stages. I feel the entire community can benefit most have having at least some detailed impacts analysis at this time.</p> <p>BR-9 As an aside, although I recognize that no height increases are proposed in the Clairemont District portion of the plan, in my comments on the Specific Plan I am requesting that taller heights be evaluated for in the neighborhood near the Clairemont trolley station. The City</p>	<p>BR-6 Comment noted. Refer to response to comment BR-5.</p> <p>BR-7 Comment noted. This comment does not suggest an inadequacy in the analysis of the PEIR.</p> <p>BR-8 Comment noted. Visual simulations would be more appropriate at the project level as actual developments are proposed. See also response to comment BR-5.</p> <p>BR-9 The comment does not raise an issue with regard to the adequacy of the PEIR; however, all comments will be forwarded to decision makers for consideration.</p>
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LETTER

RESPONSE

must take advantage of every opportunity presented to allow more dense development, and we must not automatically disallow higher buildings until we have done a serious analysis of the impacts of such developments. I drive past the area of the proposed Clairemont trolley station every day and feel that a wisely designed attractive development could reach as high as 65 feet without destroying the neighborhood – in fact, it could greatly improve it!

BR-10 Conclusion: Thus, to make a stronger EIR and for the benefit of all concerned, I respectfully request that the City prepare a thorough visual impacts analysis at this stage and include it in the final PEIR. The analysis should, at a minimum, includes professionally prepared visual simulations that take into account such known factors of the proposed urban landscape, showing new developments at maximum bulk and building heights, and using allowable building designs. The simulations should illustrate how the buildings can appear from different vantage points.

BR-11 To be clear: I do not necessarily disagree with a conclusion that taller buildings could have a significant visual impact, or that analysis must be made at the development permit stage. My only point is that all conclusions of impact, including at the PEIR stage, need to be supported by substantial evidence.

Thank you for your consideration of my comments.

Respectfully submitted,

Anthony Cresap
Bay Park Resident

BR-10 Concluding comment noted. Refer to response to comments BR-5 and BR-8.

BR-11 Concluding comment noted. Refer to response to comments BR-5 and BR-8.

From: Anthony Cresap
To: [PLN Planning](#)
Cc: [Malone, Rebecca](#); [Black, Laura](#); [Prinz, Michael](#); [ansen@sandiego.g](#)
Subject: Comments on Morena Corridor Specific Plan Draft
Date: Tuesday, October 02, 2018 1:42:25 AM

Dear San Diego City Planning Department:

BR-12

Following are my comments on the Draft Morena Corridor Specific Plan, version dated August 2018. I am not discussing the PEIR in this comment e-mail, but I am concurrently submitting a separate, short e-mail on the PEIR. I write as a resident of the Bay Park neighborhood area that is located uphill, North and East of the Specific Plan area. I am also very concerned about homelessness in San Diego and hope to see housing opportunities for that population are made available near the transit and trolley stations. I am asking that this letter be included in the public record for the Specific Plan.

I note this is overall an excellent document that reflects substantial input from many people the community and City and other public agencies.

For the next revision of the Specific Plan draft, I request the Planning Department seriously consider the following:

Chapter 2 or Chapter 8: Please Include a Commitment to Supportive and Transitional Housing For Homeless and Special Needs Persons Near Light Rail and Trolley Stations.

I strongly urge the City to add language include a strong, express and specific policy of commitment towards development of high-density, low-income supportive or transitional housing facilities near the transit centers in the Specific Plan area. The policy can fit into either Chapter 2 (Land Use) or Chapter 8 (Implementation). Such facilities are needed for citizens who are recovering from homelessness, who are mentally or cognitively disabled, or who are otherwise extremely low income persons with special needs (including elderly persons). This population is fairly broad but includes many homeless veterans. Among the needs are long-term rental opportunities, including group housing and residential care or supportive housing facilities, as well as independent living arrangements in either a high density SRO development or an apartment building of small efficiency apartment units.

These kinds of housing facilities often need high density to be financially viable, and the transit center neighborhoods in the Morena Corridor Specific Plan area are ideal locations for them. In fact, I would even ask the City to adopt specific numerical target: it would be ideal if the City could propose, for example, 100 individual units of supportive or longer-term transitional housing near each of the three transit centers in the Plan area. (By "units", I mean beds in group housing facility arrangements, rooms in new Single Room Occupancy hotel buildings, and small studio efficiency units for independent living. Such a commitment is only a small contribution to the overall problem, but City policies and facts compel the conclusion that we must accommodate as many new units as we can, and seize the opportunity to take advantage of the light rail and trolley transit oriented developments.

The Long-Term Homeless Crisis Affecting Persons with Disabilities Requires Policies in City Planning Documents.

BR-12 Comment noted. This comment does not suggest an inadequacy in the analysis of the PEIR.

City and County documents already recognize that San Diego suffers from an extreme – and growing – shortage of quality supportive and transitional housing opportunities for homeless and extremely low-income citizens, including persons with mental or cognitive disabilities. For instance, the 2015 *San Diego Regional Analysis Of Impediments To Fair Housing Choices* reported that a 2014 count of homeless population San Diego Regional Task Force on the Homeless yielded 8,505 homeless persons living in the County, with approximately 61 percent of those in the City of San Diego. A different estimate from just two years earlier found that the “number of people who used an emergency shelter or transitional housing program at any time from October 1, 2012 through September 30, 2013 was 12,817 persons.” (2015 Regional Analysis of Impediments, pp. 48-50.) The Analysis of Impediments also identifies some programs and projects to help fill the gap in available housing opportunities for this population.

Under City Planning Policies, Housing for Persons with Special Needs Persons is the Highest Priority, and Such Facilities Are Ideally Located Near Public Transit.

To respond to the ongoing homeless situation, the City’s Housing Element includes strong commitments to accommodate and increase the supportive and transitional housing. The Specific Plan points out that it implements the goals of the General Plan:

“The Specific Plan is consistent with, and furthers the goals and policies of the General Plan and community plans by allowing for development of mixed-use transit-oriented “villages” within the “City of Villages Strategy.”

The Specific Plan implements the General Plan and guides land use, circulation, and infrastructure improvements in the Specific Plan area.”, (Draft Specific Plan, p. 3.) The Housing Element is a part of the General Plan, so the goals and policies with respect to supportive and transitional housing must be implemented through the Specific Plan.

The Housing Element contains several relevant provisions. Under Goal 4, Objective I: Community Balance and Fair Housing:

“HE-I.3 Based on the Housing Element and General Plan policies, each community plan should include a section addressing affordable housing which addresses the community’s affordable housing needs and identifies appropriate policies and programs to achieve the goal. Community Plan updates should also include policies promoting the location of affordable and workforce housing in close proximity to employment and transit.

HE-I.4 *The City’s **highest housing priority** shall be to provide housing for very low- and low-income families and **special needs populations**.*

HE-I.5 *Encourage new **housing that relies on transit use** and environmentally sustainable patterns of movement.”*

(Housing Element, p. 124; emphasis added.)

<!--[if !supportLists]-->• <!--[endif]-->The Housing Element also identifies transit stations for higher density:

"The areas that are most suitable for higher-density infill housing are primarily those that are *located near transit stations*, major commercial corridors and in "village" locations that may be designated in future community plans." (Housing Element, Goal 3, . HE-91, emphasis added.)

<!--[if !supportLists]-->• <!--[endif]-->Additionally, the Housing Element includes a specific program that acknowledges the City's obligations towards supportive and transitional housing proposals under state law SB2. The Element states: "known as the Cedillo Bill, enacted in October 2007, [SB2] clarifies that local governments must analyze constraints to the development of emergency shelters, transitional, and supportive housing....SB2 provides that Transitional Housing and Supportive Housing must be treated the same as any other residential use within the same zone." The Element then proceeds to acknowledge an application of fair housing laws.

(Housing Element, pp. 126-127.)

<!--[if !supportLists]-->• <!--[endif]-->Because under SB2 directs that supportive and transitional housing be treated the same as other residential uses in the same zone, it follows that the City should plan for supportive and transitional housing just as any other high density development near the transit centers.

<!--[if !supportLists]-->• <!--[endif]-->The Housing Element also incorporates a program that states that the City will take actions to remove impediments identified in the 2011 Housing Impediments Analysis. (Housing Element, Program 2 (Reduce Impediments to Fair Housing, p. HE-127.)

The City's 2011 Housing Impediments Analysis also compels the City to development of housing opportunities for persons with special needs.

The Housing Impediments is prepared under the City of San Diego's Fair Housing Action Plan. It sets out one impediment as "*Limited housing choices for persons with disabilities*". A goal is then set in the document to "Increase housing choices for persons with disabilities". Activities and strategies to achieve the goal includes: "Expand the variety of available housing types and sizes. Increasing housing options for not only persons with disabilities, but also senior households, families with children, farmworkers, the homeless, etc." (2010-15 Fair Housing Action Plan, Appendix D.)

The 2015-2020 update to the Impediments Analysis specifically calls out NIMBYism against supportive group housing facilities for persons with disabilities. : "Community opposition to high-density housing, affordable housing, and housing for persons with special needs (disabilities and homeless) is directly linked to the lack of such housing options for residents in need. In particular, community opposition is typically strongest against high-density affordable housing and group homes for persons with mental disabilities."

The Impediments Analysis further states, under "Housing Options": "Impediments: Housing choices for special needs groups, especially persons with disabilities, are limited." (2015 Impediments update, page. 204.) The scheduled action is the same as the City set it out in the 2010 version: "*Increase housing options for special needs populations, including persons with disabilities, senior households, families with children, farmworkers, the homeless, etc.*"

LETTER

RESPONSE

Chapter 2: Commit to High Density Transit-Oriented Development at Clairemont Trolley Station.

I specifically request that the City increase the height limit in the Clairemont District area of the Specific Plan, and plan for a transit-village at that location. The “village” need not be as big as one developed the Transit Oriented Development Enhancement Program Linda Vista, but I feel that 30 feet is too restrictive and that we need to increase the height to at least 45 feet.

Conclusion: Because the City has a compelling need to add man new units in supportive or transitional housing for persons with disabilities or other special needs, I urge the City to include policies as described above.

Thank you very much for considering my input.

Respectfully submitted,
Anthony Cresap
Bay Park