

**OLD TOWN SAN DIEGO COMMUNITY PLAN UPDATE
FINAL PROGRAM ENVIRONMENTAL IMPACT REPORT
SAN DIEGO, CALIFORNIA
PROJECT #561630 / SCH # 2018011022**

Prepared for:

City of San Diego
Planning Department
9485 Aero Drive
San Diego, California 92123

Prepared by:

AECOM
401 West A Street, Suite 1200
San Diego, California 92101
Phone: (619) 610-7600
Fax: (619) 610-7601

July 2018

FINAL PROGRAM ENVIRONMENTAL IMPACT REPORT

Project No. 561630
SCH No. 2018011022

SUBJECT: OLD TOWN SAN DIEGO COMMUNITY PLAN UPDATE

APPLICANT: City of San Diego Planning Department

FINAL DOCUMENT July 11, 2018:

In response to comments received during public review and City staff input subsequent to distribution of the Draft Program Environmental Impact Report (PEIR), minor revisions, clarifications and/or additions have been made to the document which do not change the conclusions of the Final PEIR regarding the project's potential environmental impacts and required mitigation. As defined in CEQA Section 15088.5, these revisions, clarifications or additions 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 Old Town San Diego Community Plan Update ("proposed CPU" or "project") provides detailed policy direction to implement the General Plan with respect to the distribution and arrangement of land uses (public and private), the local street and transit network, prioritization and provision of public facilities, community-wide and site-specific architectural and urban design guidelines, and recommendations to preserve and enhance natural open space and historic and cultural resources within the Old Town community.

Implementation requires City Council approval and adoption of the proposed Old Town Community Plan Update and other associated discretionary actions, including amendments to the General Plan to incorporate the proposed CPU as a component of the General Plan Land Use Element, rezoning of land within the community associated with the Old Town San Diego Planned District Ordinance to be consistent with the proposed CPU, and rescinding the Old San Diego Architectural and Site Development Standards and Criteria. The project also requires adoption of amendments to the San Diego Municipal Code related to the Old Town San Diego Planned District Ordinance and tandem parking and sign requirements. A comprehensive update to the Impact Fee Study (formerly known as the Public Facilities Financing Plan) is also proposed for adoption in a subsequent discretionary action. Collectively, these actions together

with the proposed CPU form the project analyzed in the Program Environmental Impact Report (PEIR).

PROJECT LOCATION:

The project area encompasses roughly 275 acres and is centrally located to the northwest of Downtown San Diego and southeast of Mission Bay. I-8 functions as the northern boundary of the proposed Old Town CPU area, while I-5 provides the western boundary; the Mission Hills/Uptown hillsides form the southern and eastern boundaries of the proposed CPU area. The community lies between the Midway Pacific-Highway Community Plan area to the west and south, the Uptown Community Plan area to the east, and the Mission Valley Community Plan area to the north. The proposed CPU area is predominantly urbanized and is generally characterized by a mix of commercial, residential, park, and institutional uses. Commercial development in the Old Town community is generally tourist-oriented.

ENVIRONMENTAL DETERMINATION:

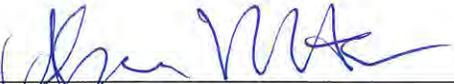
The purpose of this document is to inform decision-makers, agencies, and the public of the significant environmental effects that could result if the project is approved and implemented, identify possible ways to minimize the significant effects, and describe a reasonable range of alternatives to the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

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.

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 project could result in significant and unavoidable impacts in the areas of **Transportation and Circulation (Traffic Circulation)**, **Historical and Tribal Cultural Resources (Historical, Tribal Cultural, and Archaeological Resources)**, **Noise (Vehicular Noise and Construction-Related Vibration)**, and **Paleontological Resources (Ministerial Projects)**. All other impacts analyzed in this Draft PEIR were found to be less than significant.

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

July 11, 2018
Date of Final Report

Analyst: Susan Morrison, AICP, Planning Department

PUBLIC REVIEW DISTRIBUTION:

The following individuals, organizations and agencies received a copy or notice of the Draft PEIR and were invited to comment on the sufficiency of the document in analyzing the possible impacts on the environment and ways in which the significant effects of the project might be avoided or mitigated (CEQA Guidelines Section 15204). Copies of the Draft PEIR and any technical appendices may be reviewed in the offices of the Planning Department, or purchased for the cost of reproduction.

FEDERAL GOVERNMENT

Federal Aviation Administration (1)
Environmental Protection Agency (19)
U. S. Fish and Wildlife Service (23)
Army Corps of Engineers (26)

STATE OF CALIFORNIA

Caltrans District 11 (31)
Department of Fish and Wildlife (32)
Cal Recycle (35)
California Environmental Protection Agency (37A)
California Highway Patrol (58)
Department of Toxic Substance Control (39)
Housing and Community Development (38)
Natural Resources Agency (43)
Regional Water Quality Control Board, Region 9 (44)
State Clearinghouse (46A)
California Coastal Commission (47)
California Air Resources Board (49)
California Transportation Commission (51)
California Department of Transportation (51A)
Native American Heritage Commission (56)
California State Parks, San Diego Coast District (40A)
California Department of Parks and Recreation, Southern Service Center (40B)
California Public Utilities Commission

COUNTY OF SAN DIEGO

Air Pollution Control Board (65)
Planning and Development Services (68)
Parks Department (69)
Public Works (70)
County Water Authority (73)
Department of Environmental Health (76)

CITY OF SAN DIEGO

Office of the Mayor (91)
Council President Cole, District 4
Councilmember Bry, District 1
Councilmember Zapf, District 2
Councilmember Ward, District 3
Council President Pro Tem Kersey, District 5
Councilmember Cate, District 6

Councilmember Sherman, District 7
Councilmember Alvarez, District 8
Councilmember Gómez, District 9

Office of the City Attorney

Jeremy Jung, Deputy City Attorney

Planning Department

Mike Hansen, Director
Tom Tomlinson, Assistant Director
Alyssa Muto, Deputy Director
Laura Black, Deputy Director
Tait Galloway, Program Manager
Vickie White, Project Manager
Elizabeth Ocampo Vivero, Senior Planner
Myra Herrmann, Senior Planner
Susan Morrison, Associate Planner
Rebecca Malone, Senior Planner
Holly Smit-Kicklighter, Associate Planner – MCSP
Samir Hajjiri, Senior Traffic Engineer
Christine Mercado, Associate Traffic Engineer
Meghan Cedeño, Assistant Traffic Engineer
Kelley Stanco, Senior Planner – Historic Resources
Benjamin Hafertepe, Facilities Financing
Angela Abeyta, Facilities Financing

Environmental Services Department

Lisa Wood, Senior Planner

Development Services Department

Helene Deisher, Development Project Manager II
Jim Quinn, Senior Engineering Geologist
Louis Shultz, Senior Engineer-Civil
Irina Itkin, Assistant Engineer-Civil
Bill Prinz, Program Manager, Local Enforcement Agency

Public Utilities Department

Vic Bienes, Director
John Helminski, Assistant Director
Keli Balo, Project Officer II

Public Works Department

James Nagelvoort, Director
Carrie Purcell, Assistant Deputy Director
James Arnhart, Project Officer II

Park and Recreation Department

Herman Parker, Director
Andrew Field, Assistant Director
Mario Llanos, District Manager
John Anderson, Senior Park Ranger

Fire-Rescue Department

Larry Trame, Assistant Fire Marshal

Police Department

Chief David Nisleit

Captain Stephanie Rose

Acting Lieutenant Tristan Schmottlach

Acting Sergeant Joshua Odom

Transportation & Storm Water Department

Kris McFadden, Director

Andrew Kleis, Deputy Director

Linda Marabian, Deputy Director

Ruth Kolb, Program Manager

Mark G. Stephens, Associate Planner

Real Estate Assets Department

Cybele Thompson, Director

Economic Development Department

Cody Hooven, Director

City Government

San Diego Housing Commission (88)

City Advisory Boards or Committees

Park and Recreation Board (83)

Community Forest Advisory Board (90)

Historical Resources Board (87)

Wetland Advisory Board (91A)

Libraries

Central Library, Government Documents (81 & 81A)

Linda Vista Branch Library (81M)

Mission Hills Branch Library (81Q)

Mission Valley Branch Library (81R)

Point Loma/Hervey Branch Library (81Z)

Other City Governments

San Diego Association of Governments (108)

San Diego Unified Port District (109)

San Diego County Regional Airport Authority (110)

Metropolitan Transit System (112/115)

San Diego Gas & Electric (114)

School Districts

San Diego Unified School District (125)

San Diego Community College District (133)

Community Planning Groups or Committees

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

Community Councils

Mission Valley Community Council (328 C)

Other Agencies, Organizations and Individuals

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

La Jolla Band of Mission Indians (225M)
Pala Band of Mission Indians (225N)
Pauma Band of Mission Indians (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)
Friends of the Mission Valley Preserve (330B)
Old Town Chamber of Commerce (369)
Presidio Park Council (370)
Erinna Arvizu
Linda Acuna
Patti Adams
Kim Adler
Brian Albright
Chuck Ambers
Karl Anderson
John Anderson
Gloria Andrade
Simon Andrews
Don Arthur
Don L. Arthur
Gina Austin
Hector Baca
Lynda Barbour
Amelia Barile Simon
Bob Barros
Jaime Barton
Murtaza Baxamusa
Bryan Bebb
Dorothy Benavides
Vanessa Bernal
Dana Bessenecker
David Bevilaqua
Gilman Bishop
Fred Blecksmith
Jack Borgos
Jacqueline Botticelli
Walter Bradfield
John Bridges
Brett Caldwell
Bill Cardenas
Sean Cardenas
Jo-Ann Carini
Peter Casellini
Paul Chace
Robert Chakarian
Monique Chausse
Therese Chung
Trevor Clarke
Chris Clifford

Neva Cobian
Thurston Coe
Michael Connolly Miskwish
Steve Cook
Bruce Coons
Coralie Cowan
Victor Crosthwaite Contreras
Linda Culp
Ann Dahlkamp
Diane Daley
Mal & Sandra Daniel
Vaughan Davies
Robert De Anthony
Vanessa De La Rosa
Sheila Deuchars
Richard Dennison
Denis Desmond
Meredith Dibden-Brown
Kimberly Dodson
Sheila Donovan
Lee Dulgeroff
Vickie Durham
Laurie Egan-Hedley
Cynthia Eldred
Otto Emme
Ed Farley
Jeannie Ferrell
Damon Fetters
Walter Fiedler
Patricia Fillet
Danny Fitzgerald
Robert Fitzgerald
Graham Forbes
Michael Freedman
David Friend
Gene Fuller
Jim Gallagher
Elaine Garrett
Greg Gastelum
Tom Gawronski
Judy Gervais
Joe Ghio
Sal Giametta
Edwina Goddard
Jennifer Goudeau
Lydia Goularte Ruiz
Fred Grand
Robert Grinchuk
Sally Gunalp
Glen Gundert
Connie M. Gunther

William Haifley
William Harvey
Amie Hayes
Scott Heath
Gudrun Hoffmeister
Tom Hoyt
Carl Huenefeld
Ed Huggin
David Hulse
Rob Hutsel
Joan Isaacson
Linda Jacobo
Eric Jencks
Richard Jensen
Bruce Johnson
Robert Johnson
Roy Johnson
Stephen Jones
Bob Kennedy
Gil Kennedy
William Kenton
Jimmy Kerr
Maureen King
Gil Klecan
Robin Kole
Marti Kranzberg
Cindy Krimmel
Janay Kruger
Christine LaFontant
Muska Laiq
Gary Lamble
Bill Lawrence
Fong-Ping Lee
Sunny Lee
Doug Livingston
Brian Longmore
Griselda Lopez
Nora Lovejoy
Diane Lowery
Jaye MacAskill
Judy Maddox
Joe Mannino
Alan Marshall
Ward Martin
Valerie Martinez
Thomas May
Mike McLaughlin
Nancy McGehee
Alex McLeland
Michael Mejia
Sam Merrick

Ann Merritt
Omar Mobayed
Geoffrey Mogilner
Mark Morrison
Lisa Mortensen
Robin Munro-Madaffer
Kim Nadel
Jerry Navarra
Justine Nielsen
Ignacio Orduno
Robert Orphey
Donal O'Sullivan
Colin Parent
Rashik Patel
Marie Pedrin-Gizoni
Randi Perez
David Pettigrew
Heather Poirier
Diane Powers
Guy Preuss
Gary Pryor
Dale Pursel
Patti Rank
Tyler Renner
Lorna Rice
John Rickards
Mary Robbins Wade
Christine Robinson
Bianca Romani
Chuck Ross
Donald Rudesill
Parish Rye
Jerry Schaefer
Mignon Scherer
Eric Schuff
Fred Schwartz
Barbara Scott
Ed Seegmiller
Richard Sells
Jim Seman
Dennis Sharp
T. Sheldon
Vera Shepard
Abel Silvas
Betty Slater
Arlette Smith
Gregory Smith
R. Smith
Daniel Soderberg
Deanna Spehn
Karen Springs

Caroline St Clair
Bill Stelmach
Lee Steuer
Dean Stratton
David Swarens
Mark Thomsen
David Thornton
Margaret Townsend
Jerry Trimble
Erica Ueland
Danny Veeh
Kristen Victor
Susan Wachowiak
Blair Ward
Richard Warner
Clifford Weiler
Bethany Weisberg
Lee Winslett
Nore Winter
Matthew Winter
Diana Woodside
Robert Zink
Briggs Law Corporation

Old Town San Diego Community Plan Amendment Program Environmental Impact Report Comment Letters and Responses

According to the California Environmental Quality Act (CEQA) Guidelines Section 15088(a), “the lead agency shall evaluate comments on environmental issues received from persons who reviewed the Draft EIR and shall prepare a written response.” This section provides responses to written environmental comments received during the 60-day public review period for the Draft Program Environmental Impact Report (Draft PEIR) that started February 12, 2018 and ended March 15, 2018. A total of 10 comment letters were received during the review period.

Comment letters for the Draft PEIR were received from the following public agencies and organizations that provided comments during the review period (Table 1). Several comment letters received during the Draft PEIR public review period contained accepted revisions that resulted in changes to the Final Program Environmental Impact Report (Final PEIR) text. These changes to the text are indicated by strike-out (deleted) and underline (inserted) markings. The letters of comment and responses follow.

Table 1: List of Commenting Agencies, Organizations, and Individuals

<i>Letter</i>	<i>Commenter</i>	<i>Letter Date</i>
Agencies		
A1	State Clearinghouse	3/2/2018
A2	California Public Utilities Commission (CPUC)	2/20/2018
A3	Caltrans	2/27/2018
A4	SANDAG	3/1/2018
A5	California Department of Fish and Wildlife (CDFW)	3/8/2018
A6	California Department of Parks and Recreation	3/16/2018
Organizations		
B1	Jamul Indian Village of California	1/17/2018
B2	San Diego County Archaeological Society, Inc.	2/28/2018
B3	Save Our Heritage Organisation	3/8/2018
B4	Old Town San Diego Community Planning Group	3/15/2018

Letter A1



EDMUND G. BROWN JR.
GOVERNOR

STATE OF CALIFORNIA
GOVERNOR'S OFFICE of PLANNING AND RESEARCH
STATE CLEARINGHOUSE AND PLANNING UNIT



KES ALEX
DIRECTOR

March 2, 2018

Susan Morrison
City of San Diego
1010 Second Ave, Suite 1200, east tower, MS 413
San Diego, CA 92101

Subject: Old Town San Diego Community Plan Update
SCH#: 2018011022

Dear Susan Morrison:

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 March 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
1-916-445-0613 FAX 1-916-558-3164 www.opr.ca.gov

Letter A1 - State Clearinghouse (3/2/2018)

A1-1: Comment noted. The City appreciates the Office of Planning and Research's coordination of the Draft Program Environmental Impact Report (PEIR). As indicated, two comment letters were received by the State Clearinghouse. The responses to these individual comment letters are provided under Comment Letter A2 (CPUC) and Comment Letter A5 (CDFW).

A1-1

**Document Details Report
State Clearinghouse Data Base**

SCH# 2018011022
Project Title Old Town San Diego Community Plan Update
Lead Agency San Diego, City of

Type EIR Draft EIR
Description Note: Reference SCH# 2015111013

The project includes the comprehensive update to the 1987 Old Town San Diego Community Plan, which is intended to guide development through 2035. For facility planning, technical evaluation, and environmental review purposes, build-out is assumed to occur in 2035. The proposed CPU provides detailed policy direction to implement the GP with respect to the distribution and arrangement of land uses, the local street and transit network, prioritization and provision of public facility, community-wide and site-specific architectural and urban design guidelines, and recommendations to preserve and enhance natural open space and historic and cultural resources within the Old Town community. The Old Town community is characterized by its significant historical importance for the city of SD. Old Town is a historic and cultural destination for visitors, as well as neighborhood incorporating residential, commercial, and institutional uses.

Lead Agency Contact

Name Susan Morrison
Agency City of San Diego
Phone 619-533-6492 **Fax**
email
Address 1010 Second Ave, Suite 1200, east tower, MS
City 413 **State** CA **Zip** 92101
 San Diego

Project Location

County San Diego
City
Region
Lat / Long
Cross Streets Taylor St/Congress St, San Diego Ave/Hortensia St
Parcel No.
Township **Range** **Section** **Base**

Proximity to:

Highways I-5, 8
Airports Lindbergh Field
Railways San Diego Trolley, AT&SF, Coaste
Waterways SD River, SD Bay, Mission Bay
Schools Mult
Land Use mix of parks, residential, commercial, institutional

Project Issues Aesthetic/Visual; Agricultural Land; Air Quality; Archaeologic-Historic; Biological Resources; Coastal Zone; Cumulative Effects; Drainage/Absorption; Flood Plain/Flooding; Geologic/Seismic; Growth Inducing; Landuse; Noise; Other Issues; Population/Housing Balance; Public Services; Recreation/Parks; Sewer Capacity; Soil Erosion/Compaction/Grading; Solid Waste; Toxic/Hazardous; Traffic/Circulation; Vegetation; Water Quality; Water Supply; Tribal Cultural Resources

Reviewing Agencies Resources Agency; California Coastal Commission; Department of Fish and Wildlife, Region 5; Office of Historic Preservation; Department of Parks and Recreation; Caltrans, Division of Aeronautics; Caltrans, District 11; Office of Emergency Services, California; Department of Housing and Community Development; Regional Water Quality Control Board, Region 9; Department of Toxic Substances Control; Resources, Recycling and Recovery; Native American Heritage Commission; Public Utilities

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

THIS PAGE INTENTIONALLY LEFT BLANK

Document Details Report
State Clearinghouse Data Base

Commission: State Lands Commission

Date Received 01/16/2018 *Start of Review* 01/16/2018 *End of Review* 03/01/2018

THIS PAGE INTENTIONALLY LEFT BLANK

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

LETTER

RESPONSE

STATE OF CALIFORNIA

EDMUND G. BROWN JR., Governor

PUBLIC UTILITIES COMMISSION

320 WEST 4TH STREET, SUITE 840
LOS ANGELES, CA 90013



February 20, 2018

Susan Morrison
City of San Diego
1010 Second Ave, Suite 1200, east tower, MS 413
San Diego, CA 92101

Governor's Office of Planning & Research
FEB 21 2018
STATE CLEARINGHOUSE

SENT VIA EMAIL

Re: Midway-Pacific Highway and Old Town San Diego Community Plan Updates
SCH# ~~2015111013~~ and SCH# 2018011022

Dear Ms. Morrison:

The California Public Utilities Commission (CPUC or Commission) has jurisdiction over the safety of rail crossings in California. The California Public Utilities Code requires Commission approval for the construction or alteration of crossings and grants the Commission exclusive power on the design, alteration and closure of rail crossings. The Commission's Rail Crossings and Engineering Branch (RCEB) reviewed the Draft Environmental Impact Reports (DEIR) for the *Midway-Pacific Highway and Old Town San Diego Community Plan Updates* (SCH# 2015111013 and SCH# 2018011022). The City of San Diego is the lead agency.

In the Community Plan Updates, there are proposed policies that encourage walking, bicycling, and transit use. There is discussion of improving "pedestrian and bicycle facilities that provide connections to transit stops, stations, and the Old Town Transit Center". The policy should recognize that a number of the pedestrian and bicycle routes must cross the railroad and/or transit tracks to get to a station or transit center.

For the current community plan updates, a policy addressing the safety of at-grade rail crossings should be clearly identified. RCEB suggests the following policy in Mobility Element of both community plans:

"Coordinate with MTS, North County Transit District, CPUC and other agencies as appropriate to construct vehicular and pedestrian safety improvements at existing rail crossings. Specific rail crossings that should be targeted for improvements are identified below."

There are at least five rail crossings, including both railroad and light rail transit tracks, in the area covered by the Community Plan Updates. The tracks are near the eastern edge of the 'Midway-Pacific Highway' community and the western edge of the 'Old Town San Diego' community. Pedestrian, vehicular, and rail safety should be considered near the tracks. Development near the railroad and rail transit right-of-way should be planned with the safety of the rail corridor in mind.

The five railroad crossings listed below have an unusual combination of factors that may justify particular attention to rail crossing safety during the community planning process. These factors include the high number of trains and trolleys, projected increases in train volumes, presence of four tracks at each crossing, concurrent operation of mainline railroad and adjacent trolley tracks,

A1-2: This comment includes the letter submitted by the CPUC. The responses to this comment letter are provided under Comment Letter A2.

A1-2

Susan Morrison, City of San Diego
 SCH# 2015111013 and SCH# 2018011022
 February 20, 2018
 Page 2

significant volumes of roadway users, higher train speeds than the downtown area, and the presence of nearby intersections.

There are five at-grade rail crossings that have both railroad and transit tracks in this area.

DOT#	Street Name	Adjacent Station
026852D	Taylor Street	Old Town Transit Center
026856F	Noell Street	
026857M	Washington Street	Washington Street Station
026859B	Sassafras Street	
026861C	Palm Street	Middletown Station



Figure 1 (above): Map of rail crossings

Grade separation

Consistent with policy stated in Commission General Order 75-D, CPUC staff supports grade separation at rail crossings. Such projects may reduce or eliminate conflicts between trains and roadway users. However, due to a variety of constraints discussed in the Community Plan Updates, it seems likely that the at-grade rail crossings will remain for many years.

Safety of At-Grade Rail Crossings

The safety of the rail crossings can be improved through traffic signal modifications (such as construction of pre-signals), railroad crossing warning devices (such as construction of gates for pedestrians), and other treatments. There is funding available for construction of safety improvements at railroad crossings. However, to accomplish such improvements would require that the City coordinate with a number of organizations including San Diego Metropolitan Transit System (MTS), North County Transit District, and CPUC. Other agencies may also have a role in such

A1-2
(cont.)

THIS PAGE INTENTIONALLY LEFT BLANK

Susan Morrison, City of San Diego
 SCH# 2015111013 and SCH# 2018011022
 February 20, 2018
 Page 3

projects, including the San Diego Association of Governments (SANDAG), California Department of Transportation (Caltrans), and San Diego County Regional Airport Authority.

These crossings have automatic warning devices which are maintained in generally the same configuration as constructed approximately 20 years ago, when trolley tracks were extended to Old Town Transit Center. However, the City should consider that there has been and continues to be further development in San Diego since that time, and an increasing number of trains is expected along this corridor in the future. These five rail crossings could benefit from further safety improvements.

There have been incidents at these crossings in which a person along the sidewalk has been struck by a train, or in which a vehicle stopped on the tracks has been struck by a train. Most of those incidents have occurred at the railroad tracks, not the transit tracks, but adjacent to the transit stations. Because of the close proximity of the transit stations to the railroad tracks, safety improvements for the railroad crossing may require modifications at the railroad tracks, as well as modifications at the transit tracks and platforms.

Safety Improvement Costs

Regarding implementation, the Old Town Community Plan, Section 11.2 states:
 "Grants and other sources of funding should be pursued wherever possible. A complete list of public infrastructure and facilities needs identified during the preparation of this Community Plan is included in the Impact Fee Study."

A1-2
(Cont.)

The City should consider the costs to initiate and develop safety improvement projects at rail crossings. There is federal funding, administered by the state, for construction of rail crossing safety improvements. For additional information, please refer to the 'Funding Programs' link on the CPUC website at <http://www.cpuc.ca.gov/crossings>. The planning for such improvements should consider that some costs, such as project management, preliminary design, or right-of-way acquisition, may need alternate sources of funding as part of such a project.

Rail Safety Considerations

A report¹ published in 2017 by the Federal Railroad Administration (FRA) provided a number of insights regarding rail crossing accidents. The top four items identified in the report are directly relevant to the rail crossings listed above.

The results of the in-depth data analysis provided the following insights into grade crossing accidents:

1. Rail and highway traffic volumes have the largest influence on accidents.
2. Train speed has a significant effect on the injury and fatality rate of vehicle drivers.
3. Higher volume of main tracks and highway lanes lead to more accidents.
4. Having a highway intersection near a grade crossing nearly doubles the risk for accidents.

Figure 2 (above): Excerpt from 2017 FRA report.

¹"In-Depth Data Analysis of Grade Crossing Accidents Resulting in Injuries and Fatalities", Federal Railroad Administration (FRA), May 2017.

THIS PAGE INTENTIONALLY LEFT BLANK

1. Traffic Volumes

a. Rail Traffic Volumes:

- Rail traffic (railroad and trolley) volumes are high along this rail corridor, and are projected to increase.
- The crossings between Old Town Transit Center and the downtown Santa Fe Depot Station are projected to have the highest rail traffic volumes of any rail corridor in San Diego County.
- Along the railroad tracks, there are currently approximately 50 trains per day. However, projections for year 2030 show nearly twice as many trains--98 trains per day².
- Along the trolley tracks (MTS/SDTI Green Line as of 2016), there are approximately 177 trolley trips per day. The frequency of trips (headway) along this line is one trolley in each direction approximately every 15 minutes. However, projections for year 2030³ show headway of 7.5 minutes. With a shorter headway, there may be near 300 trolley trips per day through these crossings.

b. Motorist Traffic Volumes:

- Past traffic counts have identified relatively high volumes of traffic that cross the tracks at the major arterials: Taylor Street and Washington Street. In 2016, Sassafras Street traffic volumes may have increased upon the opening of the new rental car center at the airport.

c. Pedestrian traffic volumes:

- Pedestrians have been observed at all of these crossings, with the highest volumes where there is an adjacent or nearby station, including Taylor Street, Washington Street, and Palm Street. Policies and goals stated in the Community Plan Update would encourage higher numbers of pedestrians at locations near the rail transit corridor, particularly in the vicinity of those stations.

2. Train speed:

- Rail speeds (railroad and trolley) speeds are higher than in the downtown area.*
- Railroad speed.* Currently train speeds are allowed at up to 65 MPH at Noell Street and Washington Street, and up to 50 MPH as Sassafras Street and Palm Street. At Taylor Street the maximum train speed is currently 40 MPH, however, in the past there were severe incidents involving trains at higher speeds.
- Trolley speed.* Typical trolley speeds are highest at Sassafras Street and Noell Street (up to 55 MPH). At crossings adjacent to stations, trolleys are typically traveling around 20 MPH or less.

3. Multiple tracks and multiple lanes

a. Multiple tracks

- All of the crossings above have 4 tracks, including 2 light rail transit tracks and 2 mainline railroad tracks.

THIS PAGE INTENTIONALLY LEFT BLANK

A1-2
(cont.)

²-Table 6.1.12: Oceanside to San Diego Total Train Trips, LOSSAN Corridorwide Strategic Implementation Plan, LOSSAN, 2012.

³-Table 3-20: Summary of Transit Performance - 2010 and 2030, Final Supplemental Environmental Impact Statement and Subsequent Environmental Impact Report, Mid-Coast Corridor Transit Project, SANDAG, September 2014

- Multiple tracks result in a long distance for pedestrians or vehicles to move across all the tracks. For example, at Washington Street, a pedestrian must travel approximately 80 feet to move across all 4 tracks. At 3.5 feet per second, this would take approximately 23 seconds.
- There is potential for confusion about why warning devices remain activated. A pedestrian may believe that warning devices are activated for a train that has just passed, or a trolley that can be seen approaching the station. The pedestrian may casually walk past the flashing light signals. However, the pedestrian may not recognize that the warning devices are activated due to an approaching train traveling 65 MPH along railroad track adjacent to the trolley station.

b. Multiple Lanes

- At Taylor Street, Washington Street, and Sassafras Street, there are multiple lanes of traffic in each direction.

4. Nearby intersections

- All of the crossings have a nearby intersection on both sides of the tracks.
- Traffic queues can extend from nearby intersections, resulting in vehicles stopping on the tracks.
- There are a variety of measures that should be considered, including the installation of pre-signals and/or queue cutters, which are traffic signals intended to stop vehicles prior to the tracks.

Based on the FRA's Web-Based Accident Prediction System¹ the crossings of Washington Street, Palm Street and Sassafras Street currently have the second, third and seventh highest accident prediction rates of the 142 crossings that are listed by FRA within the City of San Diego.

Truck Access

In the Midway-Pacific Highway plan, there is a proposed policy regarding truck access:

ME-9.4 Coordinate with Caltrans, the San Diego Unified Port District, and the San Diego County Regional Airport Authority to improve truck access to and from the San Diego International Airport and I-5.

Trucks can present a concern at the rail crossings, such as Sassafras Street and Washington Street, due to the limited distance between the tracks and nearby intersections. If trucks are directed to use particular at-grade rail crossings, additional safety measures may need consideration at those locations.

Conclusion

Modification to an existing public rail crossing requires authorization from the Commission. RCEB is available to discuss the safety of crossings. More information can be found at: <http://www.cpuc.ca.gov/crossings/>

THIS PAGE INTENTIONALLY LEFT BLANK

A1-2
(cont)

¹Reviewed on February 1, 2018, FRA Web Accident Prediction System (WBAPS), <http://safetydata.fra.dot.gov/webaps>.

Susan Morrison, City of San Diego
SCH# 201511013 and SCH# 2015011022
February 20, 2015
Page 6

AI-2
(cont)

If you have any questions, please contact me at kevin.schumacher@cdps.ca.gov or (415) 310-9607

Sincerely,



Kevin Schumacher
Utilities Engineer
Rail Crossings and Engineering Branch
Safety and Enforcement Division

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

THIS PAGE INTENTIONALLY LEFT BLANK



EDMUND G. BROWN JR.
GOVERNOR

STATE OF CALIFORNIA
GOVERNOR'S OFFICE of PLANNING AND RESEARCH
STATE CLEARINGHOUSE AND PLANNING UNIT



KEN ALEX
DIRECTOR

March 8, 2018

Susan Morrison
City of San Diego
1010 Second Ave, Suite 1200, east tower, MS 413
San Diego, CA 92101

Subject: Old Town San Diego Community Plan Update
SCH#: 2018011022

Dear Susan Morrison:

The enclosed comment (s) on your Draft EIR was (were) received by the State Clearinghouse after the end of the state review period, which closed on March 1, 2018. We are forwarding these comments to you because they provide information or raise issues that should be addressed in your final environmental document.

A1-3

The California Environmental Quality Act does not require Lead Agencies to respond to late comments. However, we encourage you to incorporate these additional comments into your final environmental document and to consider them prior to taking final action on the proposed project.

Please contact the State Clearinghouse at (916) 445-0613 if you have any questions concerning the environmental review process. If you have a question regarding the above-named project, please refer to the ten-digit State Clearinghouse number (2018011022) when contacting this office.

Sincerely,

Scott Morgan
Director, State Clearinghouse

Enclosures

cc: Resources Agency

1400 10th Street P.O. Box 3044 Sacramento, California 95812-3044
1-916-445-0613 FAX 1-916-558-3164 www.opr.ca.gov

A1-3: Comment noted.



State of California – Natural Resources Agency
 DEPARTMENT OF FISH AND WILDLIFE
 South Coast Region
 3883 Ruffin Road
 San Diego, CA 92123
 (858) 467-4201
 www.wildlife.ca.gov

EDMUND G. BROWN JR., Governor
 CHARLTON H. BONHAM, Director



late
2/1/18

March 8, 2018

Susan Morrison, Environmental Planner
 City of San Diego Planning Department
 9485 Aero Drive, MS 413
 San Diego, CA 92123
 PlanningCEQA@sandiego.gov

Governor's Office of Planning & Research

MAR 08 2018

STATECLEARINGHOUSE

Subject: Comments on the Draft Program Environmental Impact Report for the Old Town Community Plan Update, City of San Diego, San Diego County, California (Project # 561630, SCH # 2018011022)

Dear Ms. Morrison:

The California Department of Fish and Wildlife (Department) has reviewed the above-referenced Draft Program Environmental Impact Report (DPEIR) for the Old Town Community Plan Update (community plan update). The following statements and comments have been prepared pursuant to the Department's authority as Trustee Agency with jurisdiction over natural resources affected by the project (California Environmental Quality Act, [CEQA] Guidelines § 15386) and pursuant to our authority as a Responsible Agency under CEQA Guidelines section 15381 over those aspects of the proposed project that come under the purview of the California Endangered Species Act (CESA; Fish and Game Code [FGC] § 2050 et seq.) and FGC section 1600 et seq. The Department also administers the Natural Community Conservation Planning (NCCP) program. The City of San Diego (City) participates in the NCCP program by implementing its approved Multiple Species Conservation Program (MSCP) Subarea Plan (SAP) and through the City's Vernal Pool Habitat Conservation Plan.

A1-4

The proposed project would update the Old Town Community Plan, which provides detailed policy direction to implement the General Plan with respect to the distribution and arrangement of public and private land uses, the local street and transit network, prioritization and provisions for public facilities, community-wide and site-specific architectural and urban design guidelines, and recommendations to preserve and enhance natural open space and historic and cultural resources within the Old Town community.

The proposed project area encompasses roughly 275 acres and is centrally located to the northwest of downtown San Diego and southeast of Mission Bay. Interstate 8 functions as the northern boundary of the proposed community plan update area; Interstate 5 provides the western boundary, and the Mission Hills/Uptown community hillsides form the southern and eastern boundaries of the proposed community plan update area. The Old Town community lies between the Midway Pacific-Highway Community Plan area to the west and south, the Uptown Community Plan area to the east, and the Mission Valley Community Plan area to the north. The proposed community plan update is predominantly urbanized and is generally characterized by a mix of commercial, residential, park, and institutional uses.

- 1) The PEIR and community plan update should include revised language, goals, and actions that better align with the City's MSCP SAP. For example, as a component of the community plan update, the PEIR should identify disturbed Multi-Habitat Planning Area

Conserving California's Wildlife Since 1870

A1-4: This comment includes the letter submitted by CDFW. The responses to this comment letter are provided under Comment Letter A5.

(MHPA) lands within the boundaries of the Old Town Community Planning Area (e.g., Presidio Park) that "...may be targeted for enhancement and restoration in order to more fully contribute to the functioning of the MHPA" (City SAP, section 1.4.1). Per the City SAP, urban habitat areas within the City "...contribute in some form to the MHPA, either by providing habitat for native species to continue to reproduce and find new territories, or by providing necessary shelter and forage for migrating species..." (City SAP, section 1.2.3). Thus, the inclusion of a MHPA habitat restoration component in the community plan update is consistent with the City's SAP management object number 3, "[t]o enhance and restore, where feasible, the full range of native plant associations in strategic locations and functional wildlife connections to adjoining habitat in order to provide viable wildlife and sensitive species habitat." This is also consistent with the Framework Management Plan General Management Directives—Invasive Exotics Control and Removal Priority 1 and 2.

- 2) The DPEIR states that "Only one MHPA occurs within the proposed CPU area boundaries, and therefore, direct and indirect impacts would likely be limited to rare cases where MSCP covered species or their habitat would be directly or indirectly impacted from trail or utility projects..." (page 5.13-8). The DPEIR should be amended to identify that the Old Town Community Planning Area includes multiple portions of the City's MHPA (e.g., HabiTrak gain polygons northeast of Juan Street, see Enclosure).
- 3) The DPEIR does not include the analysis that the 2015 Notice of Preparation (NOP) specifically identified as a requirement of the PEIR—"a programmatic level general biological analysis (Biological Resources Technical Report) shall be prepared for the project to include an evaluation of biological resources within each community..." and that the "...Biological Resources Technical Report shall be included in the appendices to the PEIR" (City, 2015). As a long-term planning document, the PEIR should identify the entirety of the MHPA HabiTrak gains and the potential to restore habitat values within Presidio Park in conformance with the SAP. Furthermore, the DPEIR states, "[n]o field work was conducted as part of the analysis of biological resources." Therefore, the PEIR should not make definitive statements (including environmental impact determinations) regarding the potential for future projects to have or not have impacts to biological resources without fulfilling the items detailed in the NOP.
- 4) Based on the proximity of future development to City MHPA, we anticipate that future projects that tier from the PEIR will invoke the City's SAP Land Use Adjacency Guidelines, Environmentally Sensitive Lands Regulations (ESL), and City Biology Guidelines. This includes the preparation of site-specific biological survey reports where applicable. Projects tiering from the PEIR should not rely solely on conformance to the PEIR, as the DPEIR did not conduct site-specific biological analysis.

To the extent feasible, the PEIR should anticipate its potential to influence future projects and how those projects individually or cumulatively affect biological and/or hydrological resources. Where it is impractical for the PEIR to analyze the project-specific biological and hydrological impacts, the PEIR should identify the specific trigger mechanism for additional analysis (e.g., developing a checklist as part of the formal planning review process) needed for any future project tiering from the PEIR. The trigger mechanism and how it will be implemented should be detailed by the PEIR and included as an attachment for the reviewer's reference. Currently, the DPEIR states that sensitive

THIS PAGE INTENTIONALLY LEFT BLANK

A1-4
(cont.)

Susan Morrison, Environmental Planner
City of San Diego Planning Department
March 8, 2018
Page 3 of 4

species potentially occurring within the project area will be protected by future CEQA documents; however, the DPEIR fails to identify what the trigger mechanism is to require a future (tiered) document to provide a site-specific analysis of biological or hydrological impacts.

For example, the City Biology Guidelines states that "[a] biological survey report is required for all proposed development projects that are subject to ESL, and/or where the CEQA review has determined that there may [a relatively low threshold] be a significant impact on other biological resources considered sensitive under CEQA" (City, 2012). However, we are concerned that a biological survey report may not be triggered if City ESL or Land Use Development Codes are not invoked because a tiered project is outwardly found to be "...consistent with the development density established by existing zoning, community plan, or general plan" (CEQA Guidelines § 15183).

In this example, a tiered project would only be required to comply with the City SAP Land Use Adjacency Guidelines, ESL, and aspects of the Land Use Development Code if impacts to ESL are 1) previously known or, 2) a CEQA review process indicated a possible significant impact to biological resources. Whether a project may have a significant impact on biological resources may not be apparent without first conducting site-specific surveys—surveys that are only required if there is a potential to impact the very thing the surveys are intended to detect. This problem occurs when a PEIR does not describe the parameters of its analysis for future projects and/or when the PEIR does not specify trigger mechanisms to require subsequent analysis.

To address this concern, the PEIR should incorporate the full text of section C. *Biological Resources of the City's CEQA Significance Determination Thresholds* (City, 2016) in section 5.13.5 *Mitigation Framework*, along with including this text in any Initial Study or substantial conformance review process that would tier from the PEIR. The inclusion of this language would make clear the PEIR's intention that the PEIR "...in complying with the MHPA Land Use Adjacency Guidelines requirements, discretionary and ministerial site plans (including landscape plans) for future projects would require that: grading would not impact environmentally sensitive land, potential runoff would not drain into MHPA land, toxic materials used on development would not impact adjacent sensitive land..." and alleviate our concern detailed above.

We appreciate the opportunity to comment on the DPEIR for the Old Town Community Plan Update. Questions regarding this letter and further coordination on these issues should be directed to Eric Weiss at (858-467-4289) or eric.weiss@wildlife.ca.gov.

Sincerely,



Gail K. Sevens
Environmental Program Manager
South Coast Region

Enclosure: MSCP Habitrak Lands Old Town CPU

cc: State Clearinghouse, Sacramento
David Zoutendyk, U.S. Fish and Wildlife Service, Carlsbad

THIS PAGE INTENTIONALLY LEFT BLANK

A1-4
(cont.)

Susan Morrison, Environmental Planner
City of San Diego Planning Department
March 8, 2018
Page 4 of 4

References

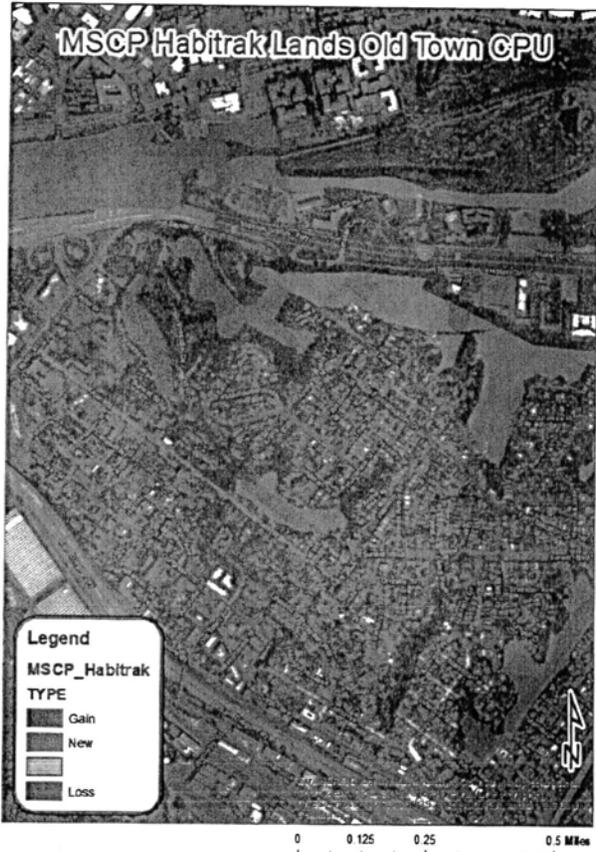
City of San Diego. March 1997. Multiple Species Conservation Program, City of San Diego Subarea Plan. City of San Diego Community and Economic Development Department.

City of San Diego. Amend. April 23, 2012. San Diego Municipal Code, Land Development Code, Biology Guidelines.

City of San Diego. November 2015. Public Notice of Preparation of a Program Environmental Impact Report and Scoping Meetings.

City of San Diego. July 2016. California Environmental Quality Act Significance Determination Thresholds—City of San Diego.
https://www.sandiego.gov/sites/default/files/july_2016_ceqa_thresholds_final_0.pdf 3

THIS PAGE INTENTIONALLY LEFT BLANK



THIS PAGE INTENTIONALLY LEFT BLANK

Letter A2

STATE OF CALIFORNIA
PUBLIC UTILITIES COMMISSION
320 WEST 4TH STREET, SUITE 500
LOS ANGELES, CA 90013

EDMUND G. BROWN JR., Governor



February 20, 2018

Susan Morrison
City of San Diego
1010 Second Ave, Suite 1200, east tower, MS 413
San Diego, CA 92101

SENT VIA EMAIL

Re: Midway-Pacific Highway and Old Town San Diego Community Plan Updates
SCH# 2015111013 and SCH# 2018011022

Dear Ms. Morrison:

A2-1

The California Public Utilities Commission (CPUC or Commission) has jurisdiction over the safety of rail crossings in California. The California Public Utilities Code requires Commission approval for the construction or alteration of crossings and grants the Commission exclusive power on the design, alteration and closure of rail crossings. The Commission's Rail Crossings and Engineering Branch (RCEB) reviewed the Draft Environmental Impact Reports (DEIR) for the *Midway-Pacific Highway and Old Town San Diego Community Plan Updates* (SCH# 2015111013 and SCH# 2018011022). The City of San Diego is the lead agency.

In the Community Plan Updates, there are proposed policies that encourage walking, bicycling, and transit use. There is discussion of improving "pedestrian and bicycle facilities that provide connections to transit stops, stations, and the Old Town Transit Center". The policy should recognize that a number of the pedestrian and bicycle routes must cross the railroad and/or transit tracks to get to a station or transit center.

A2-2

For the current community plan updates, a policy addressing the safety of at-grade rail crossings should be clearly identified. RCEB suggests the following policy in Mobility Element of both community plans:

"Coordinate with MTS, North County Transit District, CPUC and other agencies as appropriate to construct vehicular and pedestrian safety improvements at existing rail crossings. Specific rail crossings that should be targeted for improvements are identified below."

A2-3

There are at least five rail crossings, including both railroad and light rail transit tracks, in the area covered by the Community Plan Updates. The tracks are near the eastern edge of the 'Midway-Pacific Highway' community and the western edge of the 'Old Town San Diego' community. Pedestrian, vehicular, and rail safety should be considered near the tracks. Development near the railroad and rail transit right-of-way should be planned with the safety of the rail corridor in mind.

The five railroad crossings listed below have an unusual combination of factors that may justify particular attention to rail crossing safety during the community planning process. These factors include the high number of trains and trolleys, projected increases in train volumes, presence of four tracks at each crossing, concurrent operation of mainline railroad and adjacent trolley tracks,

Letter A2 - California Public Utilities Commission (CPUC [2/20/2018])

A2-1: Comment noted. This comment does not address the adequacy of the analysis presented in the Draft PEIR; however, comments related to the Old Town San Diego Draft Community Plan (Draft Community Plan) will be addressed in an attachment to the Planning Commission Staff Report.

A2-2: The Draft Community Plan includes policy ME-4.9 which addresses safety at rail crossings. To address this comment, this policy will be revised to state the following: "Coordinate with SANDAG, CPUC, MTS, and NCTD to evaluate enhancements for the at-grade railroad crossing at Taylor Street, including grade separation, that would improve pedestrian, bicyclist and vehicular safety."

A2-3: Comment noted.

significant volumes of roadway users, higher train speeds than the downtown area, and the presence of nearby intersections.

There are five at-grade rail crossings that have both railroad and transit tracks in this area.

DOT#	Street Name	Adjacent Station
026852D	Taylor Street	Old Town Transit Center
026856F	Noell Street	
026857M	Washington Street	Washington Street Station
026859B	Sassafras Street	
026861C	Palm Street	Middletown Station



Figure 1 (above): Map of rail crossings

A2-3
(cont.)

Grade separation

Consistent with policy stated in Commission General Order 75-D, CPUC staff supports grade separation at rail crossings. Such projects may reduce or eliminate conflicts between trains and roadway users. However, due to a variety of constraints discussed in the Community Plan Updates, it seems likely that the at-grade rail crossings will remain for many years.

A2-4

A2-4: Comment noted.

Safety of At-Grade Rail Crossings

The safety of the rail crossings can be improved through traffic signal modifications (such as construction of pre-signals), railroad crossing warning devices (such as construction of gates for pedestrians), and other treatments. There is funding available for construction of safety improvements at railroad crossings. However, to accomplish such improvements would require that the City coordinate with a number of organizations including San Diego Metropolitan Transit System (MTS), North County Transit District, and CPUC. Other agencies may also have a role in such

A2-5

A2-5: Comment noted.

projects, including the San Diego Association of Governments (SANDAG), California Department of Transportation (Caltrans), and San Diego County Regional Airport Authority.

These crossings have automatic warning devices which are maintained in generally the same configuration as constructed approximately 20 years ago, when trolley tracks were extended to Old Town Transit Center. However, the City should consider that there has been and continues to be further development in San Diego since that time, and an increasing number of trains is expected along this corridor in the future. These five rail crossings could benefit from further safety improvements.

There have been incidents at these crossings in which a person along the sidewalk has been struck by a train, or in which a vehicle stopped on the tracks has been struck by a train. Most of those incidents have occurred at the railroad tracks, not the transit tracks, but adjacent to the transit stations. Because of the close proximity of the transit stations to the railroad tracks, safety improvements for the railroad crossing may require modifications at the railroad tracks, as well as modifications at the transit tracks and platforms.

Safety Improvement Costs

Regarding implementation, the Old Town Community Plan, Section 11.2 states:
"Grants and other sources of funding should be pursued wherever possible. A complete list of public infrastructure and facilities needs identified during the preparation of this Community Plan is included in the Impact Fee Study."

The City should consider the costs to initiate and develop safety improvement projects at rail crossings. There is federal funding, administered by the state, for construction of rail crossing safety improvements. For additional information, please refer to the "Funding Programs" link on the CPUC website at <http://www.cpuc.ca.gov/crossings>. The planning for such improvements should consider that some costs, such as project management, preliminary design, or right-of-way acquisition, may need alternate sources of funding as part of such a project.

Rail Safety Considerations

A report¹ published in 2017 by the Federal Railroad Administration (FRA) provided a number of insights regarding rail crossing accidents. The top four items identified in the report are directly relevant to the rail crossings listed above.

The results of the in-depth data analysis provided the following insights into grade crossing accidents:

1. Rail and highway traffic volumes have the largest influence on accidents.
2. Train speed has a significant effect on the injury and fatality rate of vehicle drivers.
3. Higher volume of main tracks and highway lanes lead to more accidents.
4. Having a highway intersection near a grade crossing nearly doubles the risk for accidents.

Figure 2 (above): Excerpt from 2017 FRA report

¹"In-Depth Data Analysis of Grade Crossing Accidents Resulting in Injuries and Fatalities", Federal Railroad Administration (FRA), May 2017.

A2-6: Comment noted. The safety and operation of roadway-rail at-grade crossings is a joint responsibility of the roadway operator (i.e., the City) and the railroad operators (i.e., MTS, NCTD, Amtrak, and BNSF), while SANDAG can provide planning and project management support. SANDAG is also currently conducting a feasibility study of the potential rail improvements along the corridor between Laurel Street and Taylor Street, which is jointly funded by the City of San Diego and the County of San Diego. Therefore, safety improvements and projects at rail crossings is a coordinated and collaborative effort between the City and other agencies.

The Draft Community Plan's Mobility Element supports roadway-rail grade separation as a long-term option that will improve safety and eliminate the need for bells and horns at the existing grade crossing, reducing the noise level. Specifically, through Policy ME 4.9, options for grade separation of the at-grade crossing at Taylor Street to enhance pedestrian, bicyclist, and vehicular circulation would be evaluated.

Additionally, Policy ME-4.11 in the Mobility Element notes that the City will seek regional, state, and federal funding for improvements at the Taylor Street at-grade rail crossing to address pedestrian and bicyclist safety and accessibility. As part of this effort and in coordination with the railroad operators and SANDAG, the City will keep in mind to reference the "Funding Programs" link provided in the comment for any federal funding opportunities for construction of rail crossing safety improvements.

A2-7: Comment noted.

1. Traffic Volumes

a. Rail Traffic Volumes:

- Rail traffic (railroad and trolley) volumes are high along this rail corridor, and are projected to increase.
- The crossings between Old Town Transit Center and the downtown Santa Fe Depot Station are projected to have the highest rail traffic volumes of any rail corridor in San Diego County.
- Along the railroad tracks, there are currently approximately 50 trains per day. However, projections for year 2030 show nearly twice as many trains--98 trains per day².
- Along the trolley tracks (MTS/SDTI Green Line as of 2016), there are approximately 177 trolley trips per day. The frequency of trips (headway) along this line is one trolley in each direction approximately every 15 minutes. However, projections for year 2030³ show headway of 7.5 minutes. With a shorter headway, there may be near 300 trolley trips per day through these crossings.

b. Motorist Traffic Volumes:

- Past traffic counts have identified relatively high volumes of traffic that cross the tracks at the major arterials: Taylor Street and Washington Street. In 2016, Sassafras Street traffic volumes may have increased upon the opening of the new rental car center at the airport.

c. Pedestrian traffic volumes:

- Pedestrians have been observed at all of these crossings, with the highest volumes where there is an adjacent or nearby station, including Taylor Street, Washington Street, and Palm Street. Policies and goals stated in the Community Plan Update would encourage higher numbers of pedestrians at locations near the rail transit corridor, particularly in the vicinity of those stations.

2. Train speed:

- a. Rail speeds (railroad and trolley) speeds are higher than in the downtown area.
- b. Railroad speed. Currently train speeds are allowed at up to 65 MPH at Noell Street and Washington Street, and up to 50 MPH as Sassafras Street and Palm Street. At Taylor Street the maximum train speed is currently 40 MPH, however, in the past there were severe incidents involving trains at higher speeds.
- c. Trolley speed. Typical trolley speeds are highest at Sassafras Street and Noell Street (up to 55 MPH). At crossings adjacent to stations, trolleys are typically traveling around 20 MPH or less.

3. Multiple tracks and multiple lanes

a. Multiple tracks

- All of the crossings above have 4 tracks, including 2 light rail transit tracks and 2 mainline railroad tracks.

THIS PAGE INTENTIONALLY LEFT BLANK

A2-7
(cont.)

² "Table 6.1.12: Oceanside to San Diego Total Train Trips", LOSSAN Corridorwide Strategic Implementation Plan, LOSSAN, 2012.

³ "Table 3-20. Summary of Transit Performance - 2010 and 2030", Final Supplemental Environmental Impact Statement and Subsequent Environmental Impact Report, Mid-Coast Corridor Transit Project, SANDAG, September 2014

- Multiple tracks result in a long distance for pedestrians or vehicles to move across all the tracks. For example, at Washington Street, a pedestrian must travel approximately 80 feet to move across all 4 tracks. At 3.5 feet per second, this would take approximately 23 seconds.
- There is potential for confusion about why warning devices remain activated. A pedestrian may believe that warning devices are activated for a train that has just passed, or a trolley that can be seen approaching the station. The pedestrian may casually walk past the flashing light signals. However, the pedestrian may not recognize that the warning devices are activated due to an approaching train traveling 65 MPH along railroad track adjacent to the trolley station.

b. Multiple Lanes

- At Taylor Street, Washington Street, and Sassafras Street, there are multiple lanes of traffic in each direction.

4. Nearby Intersections

- a. All of the crossings have a nearby intersection on both sides of the tracks.
- b. Traffic queues can extend from nearby intersections, resulting in vehicles stopping on the tracks.
- c. There are a variety of measures that should be considered, including the installation of pre-signals and/or queue cutters, which are traffic signals intended to stop vehicles prior to the tracks.

Based on the FRA's Web-Based Accident Prediction System⁴ the crossings of Washington Street, Palm Street and Sassafras Street currently have the second, third and seventh highest accident prediction rates of the 142 crossings that are listed by FRA within the City of San Diego.

Truck Access

In the Midway-Pacific Highway plan, there is a proposed policy regarding truck access:

ME-9.4 Coordinate with Caltrans, the San Diego Unified Port District, and the San Diego County Regional Airport Authority to improve truck access to and from the San Diego International Airport and I-5.

Trucks can present a concern at the rail crossings, such as Sassafras Street and Washington Street, due to the limited distance between the tracks and nearby intersections. If trucks are directed to use particular at-grade rail crossings, additional safety measures may need consideration at those locations.

Conclusion

Modification to an existing public rail crossing requires authorization from the Commission. RCEB is available to discuss the safety of crossings. More information can be found at: <http://www.cpuc.ca.gov/crossings/>

⁴ Reviewed on February 1, 2018, FRA Web Accident Prediction System (WBAPS), <http://safetydata.fra.dot.gov/wbanav/>

A2-8: Comment noted. This comment is related to the Midway-Pacific Highway Community Plan Update (CPU) Draft PEIR, and is included as comment response A4-8 in the Comment Letters and Responses section of the Midway-Pacific Highway CPU Revised Final PEIR, which was released on May 14, 2018. The response states that Midway-Pacific Highway Draft Community Plan policy ME-9.4 was modified to include coordination with CPUC as well as Caltrans, the San Diego Unified Port District, and the San Diego County Regional Airport Authority.

A2-9: Comment noted.

Susan Morrison, City of San Diego
SCH# 2015111013 and SCH# 2018011022
February 20, 2018
Page 6

If you have any questions, please contact me at kevin.schumacher@cpuc.ca.gov or (415) 310-9807

Sincerely,



Kevin Schumacher
Utilities Engineer
Rail Crossings and Engineering Branch
Safety and Enforcement Division

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

THIS PAGE INTENTIONALLY LEFT BLANK

Letter A3

DEPARTMENT OF TRANSPORTATION

DISTRICT 11
4050 TAYLOR STREET, MS-240
SAN DIEGO, CA 92110
PHONE (619) 688-6954
FAX (619) 688-4299
TTY 711
www.dot.ca.gov



Making Conservation
a California Way of Life.

February 27, 2018

11-SD-5, 8
PM Various
Old Town San Diego Community Plan Update
SCH #2018011022

Mr. Tanner French
City of San Diego
Planning Department
9485 Aero Drive M.S. 413
San Diego, CA 92123

Dear Mr. Tanner French:

Thank you for including the California Department of Transportation (Caltrans) in the environmental review process for the Draft Program Environmental Impact Report for the Old Town San Diego Community Plan Update 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.

A3-1

Caltrans has the following comments:

Traffic Impact Study

A3-2

1. Caltrans previously reviewed the Midway Pacific Highway and Old Town Mobility Element Updates Draft Transportation Impact Study (Dated May 2017) and commented to please use the 2010 Highway Capacity Manual (HCM) for signalized intersection analysis instead of the 2000 HCM in a letter dated August 16, 2017. However, the TIS dated December 2017 is still using the 2000 HCM.

A3-3

2. The Draft TIS dated May 2017 identifies intersection #58 having a LOS E for the PM peak hour. The Draft TIS dated December 2017 shows it as having a LOS B. What changed since the traffic volumes used are the same in both studies?

A3-4

3. Table 4-2 – Summary of Roadway Improvements, proposes roadway and intersection improvements at Sports Arena Boulevard between I-8 westbound ramps and I-8 eastbound ramps; as well as, Hancock Street between Old Town Avenue and Witherby Street (including Old Town Avenue/I-5 SB Off ramp/Hancock Street intersection). An Intersection Control Evaluation (ICE) would need to be performed

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

Letter A3 - California Department of Transportation (Caltrans [2/27/2018])

A3-1: Comment noted.

A3-2: The HCM 2000 methodology was utilized to maintain consistency with the analysis performed in both the Existing Conditions Report, which was completed in September 2012, and the Interstate 8 Corridor Study, a project that shares portions of the same study area. The analysis for the Existing Conditions Report was also performed prior to the release of SYNCHRO 8 which utilizes the HCM 2010 methodologies. For the reasons described above and per our coordination meeting with Caltrans staff on 10/24/2017, the City will proceed using HCM 2000 and commits on utilizing HCM 2010 methodology in all future City projects analyses.

A3-3: In the Draft TIS dated May 2017, the operations analysis for Intersection #58: I-5 Southbound Ramps and Sea World Drive erroneously did not analyze the southbound free-right movement under existing conditions. When the intersection control was updated, the Level of Service (LOS) was recalculated as LOS B for this intersection. The TIS dated December 2017 was updated to reflect this change.

A3-4: The recommended improvements at Sports Arena Boulevard between I-8 westbound ramps and I-8 eastbound ramps are based on the West Mission Bay Drive Bridge Replacement Project (Capital Improvement Project #S00871), which will replace the existing bridge with a 6-lane bridge. The project is currently in the final design phase and construction is estimated to start sometime in 2018. An ICE analysis is not needed since the West Mission Bay Drive Bridge Replacement Project has already been coordinated and approved by Caltrans and is commencing construction; therefore, the Old Town San Diego CPU is not proposing these improvements, but incorporating them into the analysis.

- A3-4 (cont.)
- and be reviewed by Caltrans (Traffic Operation Policy Directive 13-02). Alternative intersection design(s) will need to be considered in accordance with the ICE policy. Please refer to the policy for more information and requirements (<http://www.dot.ca.gov/trafficops/ice.html>).
- A3-5
4. Table 4-3 – Roadway Segment Level of Service Results, identifies Camino Del Rio West from Rosecrans Street to I-5/I-8 Ramps as having a significant impact due to the Preferred Plan Conditions. Section 4.6.1 – Roadway Mitigation Measures states that “the proposed improvement would require grade separation at all intersections which is not consistent with the General Plan & Community Plan Update Goals and Policies for walkable neighborhoods. Therefore, this improvement project is not identified in the Midway Pacific Highway IFS.” If this improvement is not identified, please explore mitigation options that will improve operations at Camino Del Rio West.
- A3-6
5. Table 4-3 – Roadway Segment Level of Service Results identifies Taylor Street, between Morena Boulevard and I-8 Ramps as having a significant impact due to the Preferred Plan Conditions. Section 4.6.1 – Roadway Mitigation Measures states that “widening of this roadway from a 2-Lane Collector to a 4-Lane Major Arterial would improve the operations to from LOS F to LOS B.” However, it later states in the same section that “due to the historic nature of the Old Town Community, the Preferred Plan does not propose any road widenings or significant capacity improvements; therefore, widening this roadway would not be in conformance with the Community Plan Goals and Policies. Additionally, there is not enough right-of-way to accommodate two additional through lanes and a center median while maintaining a Class II bicycle facility. Therefore, this improvement is not identified in the Old Town IFS.” If this improvement is not identified, please explore mitigation options that will improve operations on Taylor Street.
- A3-7
6. Intersection #2 Sports Arena Boulevard/West Mission Bay and I-8 WB Off-ramp has been identified as significantly impacted with the implementation of the preferred plan on Table 4-5 – Peak Hour Intersection Level of Service Results. Section 4.6.1 – Roadway Mitigation Measures mentions the addition of a third right turn lane which Caltrans does not permit or a free-right-turn movement which Caltrans does not prefer as it would affect non-motorized mode operations. Consider other alternatives to mitigate this impact as well as an ICE study.
- A3-8
7. Intersection #37 Moore Street and Old Town Avenue – The eastbound and westbound approaches along Old Town Avenue have been identified as having a significant impact with the implementation of the preferred plan on Table 4-5 – Peak Hour Intersection Level of Service Results. Section 4.6.1 – Roadway Mitigation Measures state that “implementation of an exclusive eastbound and westbound left-turn lanes on the Old Town Avenue approaches of the intersection and converting the

“Provide a safe, sustainable, integrated and efficient transportation system to enhance California’s economy and livability”

A3-4 (cont.):

Hancock Street between Old Town Avenue and Witherby Street is currently a 2-Lane Collector and is recommended to be upgraded into a 4-Lane Collector classification under the Preferred Plan Conditions. An ICE analysis at the intersection of Hancock Street/Old Town Avenue/I-5 Southbound Off Ramp could be considered once the design process has begun for the project level review and approval process of this roadway improvement project.

A3-5: Camino Del Rio West provides regional access to the freeway from the nearby Midway-Pacific Highway and Peninsula Communities; thus, improvements to this facility are beyond the scope of a community planning effort. Due to the heavy northbound/southbound traffic movements along Camino Del Rio West from Rosecrans Street to I-5/I-8 Ramps, numerous mitigation measures were considered. These measures included, but were not limited to, conversion of the roadway from an at-grade facility to an expressway, and roadway widening to include additional through lanes or turn lanes at intersections to enhance roadway operations and traffic flow. However, these mitigation measures would require acquiring additional right-of-way to widen the roadway that is already built out to its ultimate classification. Thus, widening the roadway could result in secondary impacts such as acquisition of private right-of-way, removal or reduction of pedestrian facilities, reduction to private parking lots, and impacts to existing buildings. These secondary impacts were found to conflict with the vision and policies set by the CPU; therefore, it was found that no physical mitigation measures were feasible to reduce the impacts on Camino Del Rio West to less than significant. It should also be noted that the construction of the missing I-8 and I-5 connector ramps were also considered to help alleviate congestion on Camino Del Rio West; however, since these ramps are not included in the revenue constrained scenario of SANDAG's San Diego Forward: The Regional Plan (RTP), they were only included in the plan at a policy level and not a physical improvement.

THIS PAGE INTENTIONALLY LEFT BLANK

A3-5 (cont.):

Additionally, implementation of transportation demand measures (TDM) measures that encourage carpooling and other alternate means of transportation could potentially reduce traffic along the corridor. However, future development projects' transportation studies would be able to more accurately identify potential transportation impacts along Camino Del Rio West and provide the mechanism to mitigate them through project-specific mitigation, including, but not limited to physical improvements, fair share contribution, and TDM measures which may be more cost effective than alternative infrastructure improvements, or a combination of these measures.

A3-6: On January 8, 2018, an addendum to the TIS summarized the peak hour intersection operations analysis results at Taylor Street/I-8 Eastbound Ramp, at Taylor Street/Hotel Circle South & Hotel Circle North, and at I-8 Westbound Ramp/Hotel Circle North and determined that the implementation of the Old Town Community Plan would not create significant traffic related impacts at any of these locations. As part of this supplemental analysis, a peak hour arterial analysis was also conducted for Taylor Street, between the Taylor Street/Morena Boulevard and the Taylor Street/I-8 Eastbound Ramp intersections. Based on the following criteria from the City of San Diego, this segment is no longer considered a traffic-related significant impact under all six scenarios of the Old Town CPU including the proposed project:

- Taylor Street, between the Taylor Street/Morena Boulevard intersection and the Taylor Street/I-8 Eastbound Ramp intersection, is built out to its ultimate classification as a 2-Lane Collector, per the Draft Community Plan.
- Both the Taylor Street/Morena Boulevard intersection and the Taylor Street/I-8 Eastbound Ramp intersection operate at acceptable LOS D or better under all scenarios and analysis peak hours.
- A peak hour HCM arterial analysis, which estimates average travel speed and facility level of service according to the roadway

THIS PAGE INTENTIONALLY LEFT BLANK

functional classification, was conducted in Synchro for this roadway segment. This roadway segment is projected to operate at acceptable LOS D or better under all scenarios.

Therefore, the comment requesting exploration of mitigation options at this Taylor Street segment is no longer applicable and the comment is acknowledged.

A3-7: The TIS dated December 2017 mentions the addition of a third right-turn lane as a mitigation measure at Intersection #2: Sports Arena Boulevard/West Mission Bay Drive and I-8 Westbound Off-ramp; however, it does not mention a free right-turn improvement as a mitigation measure. Though the TIS identifies the third right-turn lane as a mitigation option to reduce the impact at the intersection to less than significant, the Preferred Plan does not ultimately propose recommending this improvement and this mitigation is not included in the proposed IFS. Therefore, an ICE analysis is not warranted since no improvement or change to the intersection is recommended by the Old Town CPU.

Additionally, the West Mission Bay Drive Bridge Replacement Project (Capital Improvement Project #S00871) was modeled as part of the Preferred Plan in the SANDAG Series 12 travel forecast model. Similarly, this project was also included in the I-8 Corridor Study, as part of a collaborative effort between Caltrans and SANDAG, to study the multimodal transportation alternatives to address future regional and local travel demand within this area. As Caltrans was part of the review process for this bridge, which provides additional capacity in each direction, it was also aware of the impacts associated with capacity changes at this intersection. Construction of this Capital Improvement Project is anticipated to begin sometime in 2018.

A3-8: Additional mitigation measures were also considered for the intersection of Moore Street and Old Town Avenue; these mitigation measures include the implementation of a single-lane roundabout, and a double-lane roundabout at the intersection. However, due to the limited right-of-way at this intersection, and the short storage

A3-8
(cont)

eastbound/westbound signal phasing from permitted to protected phasing would fully mitigate the impact. However, the eastbound approach on the Old Town Avenue bridge is not wide enough to accommodate an eastbound left-turn lane. Therefore, this improvement is not identified in the Old Town IFS." If this improvement is not identified, please explore mitigation options that will improve operations on Moore Street and Old Town Avenue.

8. Section 4.4 – Freeway Segment Analysis identifies the following freeway segments as having a significant impact with the implementation of the Preferred Plan:
- I-5 NB, between Clairemont Drive and Sea World Drive (LOS E: AM & PM Peak Hours)
 - I-5 SB, between Clairemont Drive and Sea World Drive (LOS E: PM Peak Hour)
 - I-5 NB, between Sea World Drive and I-8 (LOS E: AM Peak Hour & LOS F PM Peak Hour)
 - I-5 SB, between I-8 and Old Town Avenue (LOS F: PM Peak Hour)
 - I-5 NB, between Old Town Avenue and Washington Street (LOS E: AM Peak Hour and LOS F: PM Peak Hour)
 - I-5 SB, between Washington Street and Pacific Highway (LOS F: PM Peak Hour)
 - I-5 SB, between Laurel Street and Hawthorne Avenue (LOS E: PM Peak Hour)

A3-9

Section 4.6.3 – Freeway Segment Mitigation Measures states that a Managed Lane project on I-5 along the mentioned segments above is planned in SANDAG's 2050 San Diego Forward: The Regional Plan (RTP). This is inaccurate, as neither SANDAG or any Caltrans long-range planning documents propose a Managed Lane project within any of the above mentioned limits. Please explore other mitigation options that will improve operations on I-5.

9. Section 4.5 – Ramp Meter Analysis identifies the I-5 SB/Sea World Drive Ramp (PM Peak Hour) as having a significant impact with the implementation of the preferred plan. Section 4.6.4 – Ramp Meter Mitigation Measures state that in order "to decrease delays, the ramp meter flow rate needs to be increased from 444 cars per hour to 555 cars per hour." Caltrans uses ramp metering system as part of Transportation Systems Management and Operations (TSM&O) to operate the highway system at full potential. By controlling the rate of the ramp meter, Caltrans can manage the demand at a level near freeway capacity and still keep traffic from breakdowns. By just increasing the ramp release rate from 444 vehicles per hour to 555 vehicles per hour without an evaluation of the whole system, more vehicles will merge into the mainlines and the demand passing the critical operation threshold. Thus, creating a stop and go condition on both the mainline and the ramp. This is an

A3-10

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

space on the Moore Street bridge, it could not be determined with full certainty that these improvements could reduce the impacts at the intersection to less than significant without causing secondary impacts to either private property or other freeway ramps. Therefore, the impact was determined to be significant and unavoidable.

A3-9: The RTP Revenue Constrained Managed Lanes and Highway Network proposes two managed lanes along the I-5 Freeway between the I-8 Freeway and La Jolla Village Drive. Therefore, the managed lane mitigation measure described at the following locations are still valid:

- I-5 northbound and southbound from Clairemont Drive to Sea World Drive (TRANS 5.2-9)
- I-5 northbound from Sea World Drive to I-8 (TRANS 5.2-10)

The Final PEIR will amend the mitigation language to describe that the RTP Revenue Constrained Managed Lanes and Highway Network identifies operational improvements along the following mentioned segments instead:

- I-5 northbound from Old Town Avenue to Washington Street (TRANS 5.2-11)
- I-5 southbound from I-8 to Old Town Avenue (TRANS 5.2-13)
- I-5 southbound from Washington Street to Pacific Highway (TRANS 5.2-14)
- I-5 southbound from Laurel Street to Hawthorn Street (TRANS 5.2-15)

It should be noted that the change in mitigation measures would still result in significant and unavoidable impacts, since the City does not have jurisdiction of the interstate and cannot guarantee the implementation of the improvements.

A3-10: The City understands that changing the ramp release rate without an evaluation of the whole system could increase congestion and would not be a suitable traffic mitigation. The City will revise the freeway ramp mitigation measure in the Final PEIR to state the following:

A3-10
(cont.)

increase in congestion, not appropriate traffic mitigation. Please consider other forms of mitigation at this location; such as, adding an additional storage to the ramp.

Complete Streets and Mobility Network

10. 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 supports improved transit accommodation through the provision of Park and Ride facilities, improved bicycle and pedestrian access and safety improvements, signal prioritization for transit, bus on shoulders, ramp improvements, or other enhancements that promotes a complete and integrated transportation system. Early coordination with Caltrans, in locations that may affect both Caltrans and the City of San Diego, is encouraged.

To reduce greenhouse gas emissions and achieve California's Climate Change target, Caltrans is implementing Complete Streets and Climate Change policies into State Highway Operations and Protection Program (SHOPP) projects to meet multi-modal mobility needs. Caltrans looks forward to working with the City to evaluate potential Complete Streets projects.

A3-11

Land Use and Smart Growth

11. Caltrans recognizes there is a strong link between transportation and land use. Development can have a significant impact on traffic and congestion on State transportation facilities. In particular, the pattern of land use can affect both local vehicle miles traveled and the number of trips. Caltrans supports collaboration with local agencies to work towards a safe, functional, interconnected, multi-modal transportation system integrated through applicable "smart growth" type land use planning and policies.

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.

Mitigation

A3-12

12. Pages S-9 and 5.2-34 of the DPEIR reference Mitigation Measure TRANS 5.2-24 state "Improvements could include reducing the ramp meter cycle length or providing additional travel lanes; however, specific capacity improvements are still undetermined as these are future improvements that must be defined more over time."

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

A3-10 (cont.):

The City of San Diego shall coordinate with Caltrans to address ramp capacity at impacted on-ramp locations. Particularly, this impact could be reduced to less than significant by the following improvements: additional lanes, interchange reconfigurations, the implementation of a second interchange between Sea World Drive and Clairemont Drive (which is not currently included in the San Diego Forward Plan), and TDM as described in the Mobility Element in policies ME-8.1 through 8.7; however, specific capacity improvements are still undetermined, as these are future improvements that must be defined more over time. 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 includes a variety of transit, pedestrian, and bicycle facilities that may help to reduce single-occupancy vehicle (SOV) travel which can help improve ramp capacity.

A3-11: Comment noted.

A3-12: Comment noted. Please see the response to comment A3-10.

A3-12 (cont.) Mitigation identified for freeway entrance ramps, includes adjusting ramp meter rates. Freeway flow is a major concern for Caltrans, and ramp meters are adjusted to maintain acceptable levels of freeway flow. If additional traffic is anticipated on local roads, then it is recommended to increase storage on freeway on-ramps. The mitigation needs to be revised to exclude "ramp meter cycle length" as it cannot be an improvement used for mitigation. Mitigation Measures should identify other alternatives for TRANS 5.2-24.

A3-13 13. Caltrans endeavors that any direct and cumulative impacts to the State Highway System be eliminated or reduced to a level of insignificance pursuant to the California Environmental Quality Act (CEQA) and National Environmental Policy Act (NEPA) standards.

A3-14 14. Caltrans recommends consideration of "fair share" funds towards future improvements associated with I-5 and I-8 corridors. Impacts that are significant and unmitigated/unavoidable need to have an alternative mitigation identified in the DPEIR TIS. Page 5.2-35 states that Caltrans facilities impacts "would remain significant and unavoidable". Recommended feasible mitigation measures include "fair share" contribution towards ramp widening and/or auxiliary lanes.

A3-15 15. Mitigation conditioned as part of a local agency's development approval for improvements to State facilities can be implemented either through a Cooperative Agreement between Caltrans and the lead agency, or by the project proponent entering into an agreement directly with Caltrans for the mitigation. When that occurs, Caltrans will negotiate and execute a Traffic Mitigation Agreement.

Right-of-Way

A3-16 16. Any work performed within Caltrans right-of-way (R/W) will require discretionary review and approval by Caltrans and an encroachment permit will be required for any work within the Caltrans R/W prior to construction. As part of the encroachment permit process, the applicant must provide an approved final environmental document including the California Environmental Quality Act (CEQA) determination addressing any environmental impacts within the Caltrans's R/W, and any corresponding technical studies.

17. Pages 5.11-5 to 5.11-6 (Population-Based Parks and Recreation Facilities) proposes parks in Caltrans Right-of-Way (R/W). For any proposed parks/park equivalencies on State R/W, further coordination is needed between Caltrans and the City to determine if the R/W can be declared excess and sold to a third party. If not, it may be possible to pursue an airspace lease. Caltrans policy allows for transportation compatible uses within the airspace defined as "any property within right of way

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

A3-13: Comment noted.

A3-14: Comment noted. As described in the Draft PEIR's mitigation measure descriptions for the impacted freeway facilities, there is uncertainty related to the actual improvements and associated traffic impacts that will materialize over time, especially for this programmatic-level project. Future development projects' transportation studies would be able to more accurately identify potential transportation impacts and provide the mechanism to mitigate them through project-specific mitigation including, but not limited to, physical improvements, fair share contribution, TDM measures which may be more cost effective than alternative infrastructure improvements, or a combination of these measures. The Draft PEIR also states that for mitigation measures TRANS 5.2-9 through TRANS 5.2-16, the City will continue to coordinate with Caltrans and SANDAG on future improvements, as future project-level developments proceed, to develop potential "fair share" mitigation strategies for freeway impacts, as appropriate.

A3-15: Comment noted.

A3-16: Comment noted.

Mr. Tanner French
Page 6

A3-11p
(cont.)

limits of an existing highway... that is capable of other development without undue interference with the operation and foreseeable future expansion of the transportation corridor" and includes "area in cut or fill slopes" (Caltrans Right-of-Way Manual, Section 15.01.01.01). Furthermore, Marler-Johnson Park Agreements (Section 15.04.01.05) allows a local agency to request use of Caltrans airspace for park or recreational purposes; Marler-Johnson agreements may be offered for a period of ten years with five-year extensions.

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,



DAMON DAVIS, Acting Branch Chief
Local Development and Intergovernmental Review Branch

THIS PAGE INTENTIONALLY LEFT BLANK

Letter A4



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

March 1, 2018

File Number 3300300

Ms. Susan Morrison
City of San Diego
1010 2nd Avenue, Suite 1200, East Tower, Mail Station 413
San Diego, CA 92101

Dear Ms. Morrison:

SUBJECT: Old Town San Diego Community Plan Update Draft Program
Environmental Impact Report (Project No. 561630)

Thank you for the opportunity to comment on the City of San Diego's Old Town San Diego Community Plan Update (CPU) 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.

San Diego Forward: The Regional Plan

When referring to the currently adopted Regional Plan, which was adopted in October 2015, please make initial reference to the plan as "San Diego Forward: The Regional Plan (2015 Regional Plan)" and all subsequent references as "the 2015 Regional Plan." As SANDAG continues to develop the next iteration of the Regional Plan (San Diego Forward: The 2019-2050 Regional Plan), it is important to differentiate between all past, present, and future iterations of the long-range planning document.

Smart Growth

The project site is partially in a Smart Growth Opportunity Area (SD UP-3, designated as a Potential Mixed-Use Transit Corridor) on the SANDAG Smart Growth Concept Map. Development in these areas supports a sustainable and healthy region, a vibrant economy, and an outstanding quality of life for all. The Mixed-Use Smart Growth Opportunity Area includes a minimum residential density target of 25 dwelling units per acre; a Potential Smart Growth Opportunity Area includes locations where smart growth development could occur if local land-use plans are changed. The land-use map in the draft Old Town CPU designates the residential sites within the Smart Growth Opportunity Area as able to meet the minimum density target. SANDAG appreciates the City of San Diego's land-use changes that support the Smart Growth Concept Map.

- MEMBER AGENCIES
- Cities of Carlsbad, Chula Vista, Coronado, Del Mar, El Cajon, Escondido, Imperial Beach, La Mesa, Lemon Grove, National City, Oceanside, Poway, San Diego, San Marcos, Sanlewe, Salinas 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 Chambers Association, Mission

Letter A4 - San Diego Association of Governments (SANDAG [3/1/2018])

A4-1: Comment noted. The City appreciates the San Diego Association of Governments' (SANDAG's) participation in the public review comment process.

A4-2: Comment noted. The reference to the San Diego Forward: The Regional Plan has been revised on page 4-7 to read "San Diego Forward: The Regional Plan (2015 Regional Plan)" and throughout the remainder of the Final PEIR, as well as in Draft Community Plan policy ME-3.1, to reflect "the 2015 Regional Plan."

A4-3: Comment noted.

Smart Growth Opportunity Areas also can support increased transit use, walking, and biking. Please consider increasing access to these services (e.g., via pedestrian and bicycle improvements to ensure access to the Old Town Transit Station) and referencing these planned services:

A4-4

- Rapid service (Routes 10 and 30)
 - Routes 10 and 30, currently high-frequency local bus services, will be transitioned to Rapid service
- Trolley service (Mid-Coast Trolley Extension)

Transportation Demand Management

SANDAG appreciates the inclusion of Transportation Demand Management (TDM), parking management, and Intelligent Transportation System measures in the Old Town CPU and Draft PEIR. In addition to the strategies identified in the CPU, please also consider incorporating TDM strategies to help mitigate traffic impacts and parking demand within the Old Town community:

A4-5

- Develop policies that encourage developers to integrate TDM strategies, in addition to those identified in Mobility Element Section 8.1, through the entitlement process. This could include priority parking for carpools and vanpools, secure bike parking, and bike amenities at key destinations.
- Consider developing a comprehensive parking management plan that analyzes the feasibility of parking strategies and establishment of the Old Town Community Parking District, as detailed in the Mobility Element Section 4.5, to help reduce the demand for parking. Additionally, consider the viability of parking strategies that may help mitigate parking demand prior to investing in a parking structure at the Old Town Transit Center. Such strategies could include off-street shared or leased parking, priced parking, a parking reservation system, real-time space availability, priority parking for carpools and vanpools, and the implementation of designated curb space for rideshare passenger pick-up and drop-off.

The Old Town Transit Center is included in the Mid-Coast Mobility Hub Implementation Strategy. Mobility hubs provide an integrated suite of transportation services, amenities, and technologies that enhance access to high-frequency transit stations. The CPU presents opportunities to implement mobility hub features, such as:

A4-6

- Provision and promotion of shared mobility services (e.g., on-demand rideshare, bikeshare, carshare, and microtransit) within the Old Town community. Consider pursuing partnerships and pilot projects with on-demand rideshare services (e.g., Uber, Lyft, and Waze Carpool) and microtransit, scootershare, and electric bikeshare providers that can enhance connections from the Old Town Transit Center to major employment sites, recreational areas, and tourist destinations.
- As demand for bike parking continues to grow, transition from bike racks to a secure group bike parking facility or station. Additional bike amenities, such as bicycle repair stands throughout the Old Town area, could further encourage bicycling as a convenient transportation choice. These amenities should expand upon existing bike parking at the Old Town Transit Center.

A4-4: Comment noted. Mobility Element policies throughout Section 4.1, Walkability, and Section 4.2, Bicycling, reinforce the concept of a walkable and bicycle network that connects users to transit facilities, such as the Old Town Transit Center, and an enhanced active transportation environment.

A discussion of planned transit routes/services is included in the Alternative Transportation analysis in Section 5.2, Transportation and Circulation, of the Draft PEIR, as well as Section 4.3, Transit, of the Draft Old Town San Diego Community Plan Mobility Element. These specific routes/services are also included in Figure 5.2-3, Planned Transit Facilities, of the Draft PEIR, and Figure 4-3, Planned Transit Facilities, of the Draft Community Plan.

A4-5: Comment noted. TDM strategies are addressed in the Draft Community Plan, specifically in the Mobility Element. Mobility Element policy ME-8.1 addresses car-sharing spaces, policy ME-8.7 addresses bike-share and car-share programs, policy ME-3.2 addresses secure bike parking and lockers at Old Town Transit Center, and policy ME-5.5 considers relocation of on-street parking to allow for bike parking and amenities. Regarding parking, policies in Mobility Element Sections 4.1 (Walkability), 4.2 (Bicycling), 4.3 (Transit), 4.4 (Streets and Freeways), 4.5 (Parking), and 4.6 (Wayfinding) encourage and support alternative modes of transportation to reduce demand for parking. Policy ME-5.9 in Section 4.5 also supports the creation and implementation of parking-related strategies, plans and programs through the Old Town Community Parking District contingent on funding availability.

A4-6: The Draft Community Plan plans for mobility facilities that will be implemented in the future through public and private improvements and initiatives. Mobility Element policy ME-8.7 promotes the "implementation of bike share and car share programs where appropriate to reduce the necessity for automobile ownership and use in the community." Also, Mobility Element policy ME-5.6 encourages "employees and visitors to use transit and other transportation alternatives to single-occupancy vehicle use to reduce parking demand." Further, Mobility Element policy ME-3.2

A4-6 (cont.):

encourages the “enhance[ment] of the environment at the Old Town Transit Center through the installation of additional shelters, additional seating, lighting, bicycle parking and lockers, and landscaping...” and policy ME-2.2 calls for the provision of bicycle facilities that enhance the bicycle environment and are consistent with the community’s historical character. The installation of electric car charging stations is recommended in policy ME-7.4. The use of intelligent transportation systems to include technology providing wayfinding information, regional transit services, mobility services, parking, and other transportation options is described in Section 4.7 of the Mobility Element and specifically in policies ME-7.1, ME-7.2, and ME-7.3.

A4-7: No references to SANDAG’s ridematching service are included in the Draft PEIR. However, in Section 4.8, Transportation Demand Management, of the Draft Community Plan (November 2017), policy ME-8.6 currently states “Encourage employers to participate in SANDAG’s TDM programs, such as ridematching services, subsidized vanpool program, guaranteed ride home, and teleworking, to reduce vehicular trips.” Policy ME-8.6 has been revised to read “Encourage employers to participate in and inform employees about SANDAG’s TDM programs.”

A4-8: We appreciate SANDAG’s request to upgrade Class II bicycle lanes to Class IV cycle track facilities on Morena Boulevard, Taylor Street, and Rosecrans Street. As part of the CPU’s mobility planning efforts, we have evaluated the feasibility of a Class IV facility on each of these roadways.

- Morena Boulevard – This segment of Morena Boulevard straddles the Old Town and Linda Vista Community Planning areas. The City’s current planning efforts include the on-going Morena Boulevard Corridor Plan and recommends a two-way Class IV Cycle Track facility on the west side of Morena Boulevard/West Morena Boulevard between Gesner Street and Linda Vista Road. Continuation of this cycle track to Taylor Street and into the Old

A4-6 (cont)

- Provision of designated parking for carpools, vanpools, carshare, and other shared mobility options at the Old Town Transit Center.
- Where feasible, coordinate with the Metropolitan Transit System to identify opportunities within the station to site package delivery and mobile retail services while maintaining consistency with Old Town urban design standards.
- Electric shared mobility services require fast charging points to support operations. Consider siting future electric vehicle infrastructure near transit and at key community destinations to ensure a connected charging network.
- Consider enhancing wayfinding investments to include technology that, in addition to real-time travel information, also displays information about regional transit services, shared mobility services, parking, and other available transportation options.
- Consider the provision of flexible curb space near major destinations in Old Town and near the Old Town Transit Center to help facilitate convenient rideshare passenger loading within the five-minute mobility hub access-shed.

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

A4-7

Please remove all outdated references to SANDAG ridematching service in both the Draft CPU and the PEIR and consider including a list of current offerings provided by iCommute, the SANDAG TDM Program. The SANDAG Vanpool Program provides a subsidy of up to \$400 per month for eligible vans, and soon iCommute will launch a Carpool Incentive Pilot with Waze Carpool. Schools and organizations in the community are encouraged to participate in the iCommute GO by BIKE Mini-Grant Program, as well as iCommute bike education services that promote bike safety. The iCommute Employer Services Program works with employers to develop and implement customized commuter benefit programs to encourage the use of transportation alternatives to driving alone for their employees. More information on these programs can be accessed at iCommuteSD.com.

Active Transportation

A4-8

Please consider construction of Class IV cycle tracks in lieu of Class II bike lanes on the following streets indicated in the CPU: Morena Boulevard, Taylor Street, and Rosecrans Street. These are busy sections of roadway and provide important connections to proposed Class IV cycle tracks on Pacific Highway in the SANDAG Regional Bike Plan.

Other Considerations

A4-9

On page 3-15, please make a reference to the North County Transit District (NCTD) in Section 3.5.2, “Transit,” as NCTD operates the COASTER service, which directly serves this community planning area.

SANDAG has a number of additional resources that provide additional information on and clarification of topics discussed in this letter. The following resources can be found at sandag.org:

- Riding to 2050, the San Diego Regional Bike Plan

THIS PAGE INTENTIONALLY LEFT BLANK

Town Community would require roadway segment and bridge widening along Morena Boulevard south of Linda Vista Road. This widening would impact the San Diego River, wetlands, biological resources, and conflict with the San Diego River Master Plan. Additionally, due to the existing Interstate 8 westbound ramps and eastbound loop ramps along portions of the segment, a cycle track facility was not deemed feasible and would require Caltrans coordination. Although there is no timeframe, the City is potentially considering the rehabilitation of the bridge. It would be during this time when efforts to accommodate all modes, such as inclusion of bicycle facilities, through this roadway segment would also occur. Also, if the interchange of Morena Boulevard and Interstate 8 is reconfigured, a cycle track should be evaluated at a future date. As this interchange is a Caltrans facility, the City has no control over potential improvements at this location, and based on our communication with Caltrans staff, we understand that no improvements for this interchange are proposed or funded by Caltrans at this time.

- Taylor Street – The recommendation for a Class II Bicycle Lane facility along Taylor Street is generally consistent with the intersection and lane configurations in the Mid-Coast Corridor Transit Project Traffic Impact Study. Due to the right-of-way dedicated for the bus-only lane into the Old Town Transit Center and multiple rails crossings, a cycle track is not recommended for the area. The limited right-of-way along Taylor Street further east of the Congress Street intersection similarly precludes a cycle track from this area.
- Rosecrans Street – A Class I multi-use path (the “La Playa Trail”) is proposed on the south side of Rosecrans Street from the community boundary to the intersection of Pacific Highway in Old Town. Similar to a Class IV facility, a Class I facility is separated from vehicular traffic, is considered a facility for users of all ages and abilities, and has the lowest Level of Traffic Stress (LT1) it causes cyclists.

A4-9
(cont)

- Planning and Designing for Pedestrians, Model Guidelines for the San Diego Region
- Integrating Transportation Demand Management into the Planning and Development Process – A Reference for Cities
- Trip Generation for Smart Growth
- Parking Strategies for Smart Growth
- Designing for Smart Growth, Creating Great Places in the San Diego Region

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

SANDAG appreciates the opportunity to comment on the City of San Diego's Old Town San Diego CPU 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

SL/KHE/kwa

A4-9: Comment noted. The text in the Final PEIR has been revised to read, "Policies include coordination with SANDAG, MTS, and NCTD to support and incorporate transit infrastructure..." on page 3-15 in Section 3.5.3, Transit. In addition, NCTD is referenced in Box 4-3 in Section 4.3, Transit, of the Mobility Element in the Draft Community Plan. A reference to NCTD has also been added to Mobility Element policies ME-3.1 and ME-3.3.

Letter A5



State of California – Natural Resources Agency
DEPARTMENT OF FISH AND WILDLIFE
South Coast Region
3883 Ruffin Road
San Diego, CA 92123
(858) 467-4201
www.wildlife.ca.gov

EDMUND G. BROWN JR., Governor
CHARLTON H. BONHAM, Director



March 8, 2018

Susan Morrison, Environmental Planner
City of San Diego Planning Department
9485 Aero Drive, MS 413
San Diego, CA 92123
PlanningCEQA@sandiego.gov

Subject: Comments on the Draft Program Environmental Impact Report for the Old Town Community Plan Update, City of San Diego, San Diego County, California (Project # 561630, SCH # 2018011022)

Dear Ms. Morrison:

The California Department of Fish and Wildlife (Department) has reviewed the above-referenced Draft Program Environmental Impact Report (DPEIR) for the Old Town Community Plan Update (community plan update). The following statements and comments have been prepared pursuant to the Department's authority as Trustee Agency with jurisdiction over natural resources affected by the project (California Environmental Quality Act, [CEQA] Guidelines § 15386) and pursuant to our authority as a Responsible Agency under CEQA Guidelines section 15381 over those aspects of the proposed project that come under the purview of the California Endangered Species Act (CESA; Fish and Game Code [FGC] § 2050 et seq.) and FGC section 1600 et seq. The Department also administers the Natural Community Conservation Planning (NCCP) program. The City of San Diego (City) participates in the NCCP program by implementing its approved Multiple Species Conservation Program (MSCP) Subarea Plan (SAP) and through the City's Vernal Pool Habitat Conservation Plan.

A5-1

The proposed project would update the Old Town Community Plan, which provides detailed policy direction to implement the General Plan with respect to the distribution and arrangement of public and private land uses, the local street and transit network, prioritization and provisions for public facilities, community-wide and site-specific architectural and urban design guidelines, and recommendations to preserve and enhance natural open space and historic and cultural resources within the Old Town community.

The proposed project area encompasses roughly 275 acres and is centrally located to the northwest of downtown San Diego and southeast of Mission Bay. Interstate 8 functions as the northern boundary of the proposed community plan update area; Interstate 5 provides the western boundary, and the Mission Hills/Uptown community hillsides form the southern and eastern boundaries of the proposed community plan update area. The Old Town community lies between the Midway Pacific-Highway Community Plan area to the west and south, the Uptown Community Plan area to the east, and the Mission Valley Community Plan area to the north. The proposed community plan update is predominantly urbanized and is generally characterized by a mix of commercial, residential, park, and institutional uses.

A5-2

- 1) The PEIR and community plan update should include revised language, goals, and actions that better align with the City's MSCP SAP. For example, as a component of the community plan update, the PEIR should identify disturbed Multi-Habitat Planning Area

Conserving California's Wildlife Since 1870

Letter A5 – California Department of Fish and Wildlife (CDFW [3/8/2018])

A5-1: Comment noted.

A5-2: Comment noted. The Conservation Element of the Draft Community Plan has been updated to include a robust discussion of conservation efforts for Old Town's open space areas, canyons and natural habitats and to provide policies that align with the City's MSCP Subarea Plan, MHPA Land Use Adjacency Guidelines, and Environmentally Sensitive Lands Regulations. Subsequent projects within Presidio Park, implemented in accordance with the adopted community plan would be required to demonstrate compliance with these policies, in addition to any applicable MSCP SAP MHPA Guidelines for urban areas outlined in Section 1.2.3, applicable land use considerations outlined in Section 1.4.1, and the General Management Directives outlined in Section 1.5.2.

As suggested, Section 5.13.3 Impact Analysis, on page 5.13-8 of the Final PEIR, has been revised to clarify that multiple locations of MHPA lands are mapped within the CPU boundaries; specifically, within Presidio Park. Additional language has also been added to the discussion, citing the specific MSCP SAP sections referenced in the comment that would require further consideration during project design and subsequent environmental review process. Consistency with the MSCP SAP would be assured through regulatory compliance in accordance with the Land Development Code ESL Regulations, Biology Guidelines and community plan policies.

A5-2
(cont.)

(MHPA) lands within the boundaries of the Old Town Community Planning Area (e.g., Presidio Park) that "...may be targeted for enhancement and restoration in order to more fully contribute to the functioning of the MHPA" (City SAP, section 1.4.1). Per the City SAP, urban habitat areas within the City "...contribute in some form to the MHPA, either by providing habitat for native species to continue to reproduce and find new territories, or by providing necessary shelter and forage for migrating species..." (City SAP, section 1.2.3). Thus, the inclusion of a MHPA habitat restoration component in the community plan update is consistent with the City's SAP management object number 3, "[t]o enhance and restore, where feasible, the full range of native plant associations in strategic locations and functional wildlife connections to adjoining habitat in order to provide viable wildlife and sensitive species habitat." This is also consistent with the Framework Management Plan General Management Directives—Invasive Exotics Control and Removal Priority 1 and 2.

A5-3

2) The DPEIR states that "Only one MHPA occurs within the proposed CPU area boundaries, and therefore, direct and indirect impacts would likely be limited to rare cases where MSCP covered species or their habitat would be directly or indirectly impacted from trail or utility projects..." (page 5.13-8). The DPEIR should be amended to identify that the Old Town Community Planning Area includes multiple portions of the City's MHPA (e.g., HabiTrak gain polygons northeast of Juan Street, see Enclosure).

A5-4

3) The DPEIR does not include the analysis that the 2015 Notice of Preparation (NOP) specifically identified as a requirement of the PEIR—"a] programmatic level general biological analysis (Biological Resources Technical Report) shall be prepared for the project to include an evaluation of biological resources within each community..." and that the "...Biological Resources Technical Report shall be included in the appendices to the PEIR" (City, 2015). As a long-term planning document, the PEIR should identify the entirety of the MHPA HabiTrak gains and the potential to restore habitat values within Presidio Park in conformance with the SAP. Furthermore, the DPEIR states, "[n]o field work was conducted as part of the analysis of biological resources." Therefore, the PEIR should not make definitive statements (including environmental impact determinations) regarding the potential for future projects to have or not have impacts to biological resources without fulfilling the items detailed in the NOP.

A5-5

4) Based on the proximity of future development to City MHPA, we anticipate that future projects that tier from the PEIR will invoke the City's SAP Land Use Adjacency Guidelines, Environmentally Sensitive Lands Regulations (ESL), and City Biology Guidelines. This includes the preparation of site-specific biological survey reports where applicable. Projects tiering from the PEIR should not rely solely on conformance to the PEIR, as the DPEIR did not conduct site-specific biological analysis.

To the extent feasible, the PEIR should anticipate its potential to influence future projects and how those projects individually or cumulatively affect biological and/or hydrological resources. Where it is impractical for the PEIR to analyze the project-specific biological and hydrological impacts, the PEIR should identify the specific trigger mechanism for additional analysis (e.g., developing a checklist as part of the formal planning review process) needed for any future project tiering from the PEIR. The trigger mechanism and how it will be implemented should be detailed by the PEIR and included as an attachment for the reviewer's reference. Currently, the DPEIR states that sensitive

A5-3: Please see the response to comment A5-2.

A5-4: The methodology for the biological analysis is discussed in Section 5.13.1.1, Methodology, on pages 5.13-1 through 5.13-3 of the Draft PEIR. Subsequent to the distribution of the Notice of Preparation in November 2015, it was determined that a Biological Resources Technical Report was not warranted at the programmatic level for a community plan update. As such, multiple sources of data were used to determine potential sensitive plant and wildlife species within the CPU area, including review of aerial photography and knowledge of the region by the City's environmental consultant. Furthermore, all future projects implemented in accordance with the CPU would require subsequent environmental review. Compliance with local (including City ESL regulations and MSCP Subarea Plan), state, and federal regulations would be applied, as applicable, for projects that may occur in areas of the MHPA still supporting sensitive plants and wildlife species. In addition, the CPU includes specific policies and recommendations for the protection of sensitive plant and wildlife species which currently do not exist in the adopted community plan.

A5-5: Comment noted. Section 3.6.2, Future Actions Associated with the Proposed CPU, on page 3-19 of the Draft PEIR includes a description of future actions associated with subsequent projects implemented in accordance with the CPU that would be subject to the provisions of the Community Plan and regulatory compliance laid out in the LDC and ESL. This is further described in Section 5.1.4.3, Conflicts with the MSCP Subarea Plan, on pages 5.1-13-14 of the PEIR, which assures regulatory compliance with the provisions of the MSCP Subarea Plan and San Diego Municipal Code.

Susan Morrison, Environmental Planner
City of San Diego Planning Department
March 8, 2018
Page 3 of 4

species potentially occurring within the project area will be protected by future CEQA documents; however, the DPEIR fails to identify what the trigger mechanism is to require a future (tiered) document to provide a site-specific analysis of biological or hydrological impacts.

For example, the City Biology Guidelines states that "[a] biological survey report is required for all proposed development projects that are subject to ESL, and/or where the CEQA review has determined that there may [a relatively low threshold] be a significant impact on other biological resources considered sensitive under CEQA" (City, 2012). However, we are concerned that a biological survey report may not be triggered if City ESL or Land Use Development Codes are not invoked because a tiered project is outwardly found to be "...consistent with the development density established by existing zoning, community plan, or general plan" (CEQA Guidelines § 15183).

In this example, a tiered project would only be required to comply with the City SAP Land Use Adjacency Guidelines, ESL, and aspects of the Land Use Development Code if impacts to ESL are 1) previously known or, 2) a CEQA review process indicated a possible significant impact to biological resources. Whether a project may have a significant impact on biological resources may not be apparent without first conducting site-specific surveys—surveys that are only required if there is a potential to impact the very thing the surveys are intended to detect. This problem occurs when a PEIR does not describe the parameters of its analysis for future projects and/or when the PEIR does not specify trigger mechanisms to require subsequent analysis.

To address this concern, the PEIR should incorporate the full text of section C. *Biological Resources of the City's CEQA Significance Determination Thresholds* (City, 2016) in section 5.13.5 *Mitigation Framework*, along with including this text in any Initial Study or substantial conformance review process that would tier from the PEIR. The inclusion of this language would make clear the PEIR's intention that the PEIR "...in complying with the MHPA Land Use Adjacency Guidelines requirements, discretionary and ministerial site plans (including landscape plans) for future projects would require that: grading would not impact environmentally sensitive land, potential runoff would not drain into MHPA land, toxic materials used on development would not impact adjacent sensitive land..." and alleviate our concern detailed above.

We appreciate the opportunity to comment on the DPEIR for the Old Town Community Plan Update. Questions regarding this letter and further coordination on these issues should be directed to Eric Weiss at (858-467-4289) or eric.weiss@wildlife.ca.gov.

Sincerely,



Gail K. Sevens
Environmental Program Manager
South Coast Region

Enclosure: MSCP Habitrak Lands Old Town CPU

ec: State Clearinghouse, Sacramento
David Zoutendyk, U.S. Fish and Wildlife Service, Carlsbad

THIS PAGE INTENTIONALLY LEFT BLANK

A5-5
(cont.)

Susan Morrison, Environmental Planner
City of San Diego Planning Department
March 8, 2018
Page 4 of 4

References

City of San Diego. March 1997. Multiple Species Conservation Program, City of San Diego Subarea Plan. City of San Diego Community and Economic Development Department.

City of San Diego. Amend. April 23, 2012. San Diego Municipal Code, Land Development Code, Biology Guidelines.

City of San Diego. November 2015. Public Notice of Preparation of a Program Environmental Impact Report and Scoping Meetings.

City of San Diego. July 2016. California Environmental Quality Act Significance Determination Thresholds—City of San Diego.
https://www.sandiego.gov/sites/default/files/july_2016_ceqa_thresholds_final_0.pdf 3

THIS PAGE INTENTIONALLY LEFT BLANK



THIS PAGE INTENTIONALLY LEFT BLANK

Letter A6

Morrison, Susan

From: PLN_PlanningCEQA
Subject: FW: Old Town San Diego Community Plan Update

From: Turner, Nicole@Parks [<mailto:Nicole.Turner@parks.ca.gov>]
Sent: Friday, March 16, 2018 12:14 PM
To: Dennison, Richard@Parks <Richard.Dennison@parks.ca.gov>; Smith, Darren@Parks <Darren.Smith@parks.ca.gov>; Krimmel, Cindy@Parks <Cindy.Krimmel@parks.ca.gov>
Cc: Lew, Amy@Parks <Amy.Lew@parks.ca.gov>
Subject: RE: Old Town San Diego Community Plan Update

Hi Rich,

A6-1 I just read through the sections on tribal and historical resources and I am impressed by the cultural sensitivity used in preparing this document. The Historians and archaeologists at AECOM really did a fair job. This document also includes a very helpful summary of the geology of the region and other resources in its environmental setting though I cannot attest wholly to its accuracy.

A6-2 I think we are too late and overall I am okay with the document. I have a couple comments below and could add some boiler plate DPR Cultural concerns. Let me know if you think there is still opportunity and if this is something you would like to pursue.

A6-2 A couple errors:
The document incorrectly references Old Town San Diego State Historic Park calling it *Old Town State Historic Park* leaving out "San Diego" in its name. The section on page 2-37 (Environmental Setting) describes some of the historic resources as follows: "Five original adobes are part of the complex, which includes shops, restaurants and museums. Other **historic** buildings include a schoolhouse, a blacksmith shop...a cigar shop...a stable..." The majority of these buildings are not historic but rather historic reconstructions.

A6-3 Recommendations:
San Diego Cultural staff recommend ongoing tribal consultation regarding any potential affects to tribal cultural resources and all tribal interpretive efforts within the CPU footprint.

Thank you,

Nicole Turner
San Diego Coast District Archaeologist
California Department of Parks and Recreation
4477 Pacific HWY
San Diego, CA 92110
619-933-9013
Nicole.Turner@parks.ca.gov

Letter A6 – California Department of Parks and Recreation (3/16/2018)

A6-1: Comment noted.

A6-2: "Old Town State Historic Park" has been corrected to read "Old Town San Diego State Historic Park" throughout the Final PEIR. The section at the bottom of page 2-37 within the Environmental Setting section that describes some of the historic resources has been revised in the Final PEIR to read "Other historic reconstructions include a schoolhouse, a blacksmith shop..."

A6-3: Comment noted.

Letter B1

Morrison, Susan

From: lcumper@jamulindianvillage.com on behalf of Lisa Cumper <lcumper@jiv-nsn.gov>
Sent: Wednesday, January 17, 2018 3:26 PM
To: PLN_PlanningCEQA; Herrmann, Myra
Subject: 561630 Old Town San Diego Community Plan Update

Dear Susan,

I received your letter regarding project 561630, Old Town San Diego Community Plan Update.

B1-1 Jamul would like to engage in AB-52 consulting on this project due to the result in significant and unavoidable impacts on Tribal Cultural Resources.

Thank you,
Lisa

Respectfully,



Lisa K. Cumper
Tribal Office Assistant/
Cultural Resource Manager / Tribal Liaison
Jamul Indian Village of California

P.O. Box 612, Jamul CA 91935
desk: 619.669.4855
cell: 619.928.8689
fax: 619.669.4817

email: lcumper@jiv-nsn.gov
web: www.jamulindianvillage.com

Letter B1 – Jamul Indian Village of California (1/17/2018)

B1-1: In July 2017, a letter was sent to the Jamul Indian Village (JIV) informing them that a Draft PEIR was being prepared for the project, and requesting if consultation was required in accordance with the provisions of AB 52. Although no response was received within the proscribed timeframe, information about the CPU project scope, records search results and proposed Mitigation Framework for subsequent project review was presented at the monthly tribal consultation meeting in November 2017. At that time, the City's programmatic approach to subsequent "project-level" environmental review detailed in the Mitigation Framework was discussed, including assurance that tribal consultation in accordance with the provisions of AB 52 would be implemented during project-specific environmental review when known resources are present or when a potential exists for resources to be encountered. All concurred and consultation was concluded. In response to the current comment letter received from Jamul Indian Village, the CPU was added to the March 16, 2018 monthly tribal consultation meeting. Additional information was shared with the tribal representative at the meeting, and the subsequent project evaluation process included in the Mitigation Framework was further discussed. No new issues or concerns were raised with respect to the CPU process and consultation was concluded.

Letter B2



San Diego County Archaeological Society, Inc.

Environmental Review Committee

28 February 2018

To: Ms. Susan Morrison
Planning Department
City of San Diego
Suite 1200, East Tower, MS413
1010 Second Avenue
San Diego, California 92101

Subject: Draft Program Environmental Impact Report
Old Town San Diego Community Plan Update
Project No. 561630

Dear Ms. Morrison:

I have reviewed the cultural and historical resources aspects of the subject DPEIR on behalf of this committee of the San Diego County Archaeological Society.

Based on the information contained in the DPEIR and its Appendices D and E, these reports appear well done and we have no comments on them. We reserve any detailed comments for the public review of individual projects' impacts and mitigation. Please ensure that we continue to be included in those reviews.

Thank you for providing the opportunity to participate in the review of this DPEIR.

Sincerely,


James W. Royle, Jr., Chairperson
Environmental Review Committee

cc: AECOM
SDCAS President
File

P.O. Box 81106 San Diego, CA 92138-1106 (858) 538-0935

Letter B2 - San Diego County Archaeological Society, Inc. (2/28/2018)

B2-1: Comment noted.

Letter B3



Save Our Heritage Organisation
Saving San Diego's Past for the Future

Thursday, March 8, 2018

Susan Morrison, Environmental Planner
City of San Diego Planning Department
1010 Second Avenue, Suite 1200, East Tower, MS 413
San Diego, CA 92101

Re: Old Town San Diego Community Plan Update/No. 561630

Ms. Morrison,

B3-1

Save Our Heritage Organisation (SOHO) supports the historic preservation survey done as part of the Program Environmental Impact Report (PEIR) for the Old Town San Diego Community Plan update (No. 561630), which identified 21 potentially historic resources, including motor courts. SOHO also concurs with the findings and analysis related to the historical, cultural and tribal resources, that the impacts on these resources would be significant and unavoidable, even after mitigation. Last, SOHO highlights various needed corrections related to grammar, history, and labeling of the CA State Park, Adobe Chapel, and El Campo Santo.

B3-2

Motor courts, which used to be prevalent and are now rare, are part of the greater promotion of tourism in Old Town and within San Diego. Located non-contiguously, but illustrating an important pattern of infill development, motor courts should also be included as a multiple property listing (MPL) to illustrate this collective infill pattern (similar to the Bungalow Court MPL in other areas) that is associated with the Automobile, Early Tourism and Preservation in Old Town theme. Additionally, SOHO strongly supports the individual designation of intact Motor Courts (or auto camps) within this plan area under Criteria A and/or C, as noted within the Historic Context and Survey Report, such as 2360-72 San Diego Avenue.

B3-3

The PEIR states, and SOHO concurs, that due to a high cultural sensitivity in Old Town, there is strong potential for significant and unavoidable adverse impacts to historical, cultural and tribal resources. SOHO agrees with the analysis in Table S-1 (page S-8) that impacts on historic and tribal cultural resources would be significant and unavoidable, even after mitigation. This is of particular concern in the Old Town community because the historical and cultural setting is the basis for economic and commercial activity.

B3-4

Pages 17 and 18 require minor corrections. The Estudillo House was reconstructed by Hazel Wood Waterman on behalf of J. Spreckles c.1910 (not 1969), and later restored by California State Parks in 1969. Currently, it is undergoing restoration once again. Last, page 18 has an incomplete sentence referring to the discontinuation of the cemetery in 1880.

BOARD OF DIRECTORS

Jaye MacAskill, President • David Goldberg, Vice President • Jessica McGee, Treasurer • John Eisenhart, Secretary
M. Wayne Donaldson • Erik Hanson • Paul Johnson • Nancy Moors • John Rush • Scott Sandel • David Swarens • Kiley Wallace
Bruce Coons, Executive Director

Letter B3 - Save Our Heritage Organisation (3/8/2018)

B3-1: Comment noted.

B3-2: This letter requests the identification of potential Multiple Property Listings (MPLs) related to auto camps within the community. Auto camps/motor courts are addressed in Section 10.1, Prehistoric and Historic Context, of the Draft Community Plan. However, the Historic Resources Reconnaissance Survey (survey) prepared for Old Town identified few extant examples - primarily the motor court at 2360 San Diego Avenue, which has been identified as a potential individual resource. The survey did not indicate a significant presence of extant auto camps that would warrant a community-specific MPL related to auto-camps. However, if the City pursues a City-wide MPL in the future related to bungalow courts and/or auto-camps, any relevant properties within the Old Town community would be eligible for inclusion.

B3-3: Comment noted.

B3-4: Page 17 of the survey prepared for Old Town has been corrected to read, "The residence was reconstructed in 1910 by John D. Spreckles with the assistance of Hazel Waterman, and again by the National Park Service in 1969." This information is attributed to a book published by the California Office of Historic Preservation (OHP) titled, "California Historical Landmarks". Because this information came from this cited State source, no revision to the text will be made. The sentence on page 18 of the survey referring to the discontinuation of the cemetery in 1880 has been reviewed by staff, and it was determined that no edits are required.

B3-5

Corrections for the CA State Park, Adobe Chapel, and El Campo Santo are recommended as follows. In Figure 3-2, the State Park should be listed as such instead of the "Historic Core," which actually extends down San Diego Avenue and includes more than the State Park. The Adobe Chapel is City parkland, and not County parkland as referenced in Figures 3-1 and 3-2. Third, El Campo Santo is not a "pocket park" and reference to this sacred burial site as a pocket park disrespects those buried within it. Although SOHO understands the need for an underlying zone that corresponds to this cemetery, SOHO strongly encourages the language referencing this site to be sensitive to the cultural displacement felt by many of the descendants whose family is located here. Perhaps "cemetery" could be called out specifically within the park zone, so this site can be noted in a respectful manner.

B3-6

SOHO concurs with the findings and analysis related to the historical, cultural and tribal resources within the PEIR and supports the historic survey. However, SOHO strongly urges a multiple property listing (MPL) for auto courts be included and for labels to be corrected regarding the CA State Park, Adobe Chapel, and El Campo Santo.

Thank you for the opportunity to comment,



Bruce Coons
Executive Director
Save Our Heritage Organisation

B3-5: Figure 3-2 of the Draft PEIR reflects "Sub-Districts" within the Old Town San Diego community that have been identified by the Draft Community Plan for the purposes of land use and mobility planning. The Historic Core Sub-District encompasses the Old Town San Diego State Historic Park, and the Core Sub-District includes San Diego Avenue from Twiggs Street to Ampudia Street. Regarding the Old Adobe Chapel site in Figures 3-1 and 3-2, the proposed land use designation shown is Institutional. Regarding El Campo Santo, the cemetery has a proposed land use designation of Park - City to reflect the site's importance as a historical resource for descendants and the public and its management by the City's Parks and Recreation Department. The Recreation Element of the Draft Community Plan and the Final PEIR (Page 2-37, Figure 5.11-1, and Table 5.11-1) have been revised to remove the words "Pocket Park" after references to El Campo Santo and add the word "Cemetery."

B3-6: Comment noted.

Letter B4

OLD TOWN SAN DIEGO COMMUNITY PLANNING GROUP

March 15, 2018

Submitted via email to: PlanningCEQA@sandiego.gov

Susan Morrison
Environmental Planner
City of San Diego Planning Department
9485 Aero Drive, MS 413
San Diego, California 92123

**Subject: OLD TOWN SAN DIEGO COMMUNITY PLAN UPDATE
DRAFT PROGRAM ENVIRONMENTAL IMPACT REPORT
PROJECT # 561630**

Ms. Morrison:

By action of the Old Town San Diego Community Planning Group (OTSDCPG), at its meeting of March 14, 2018, please accept this letter as our public comment in response to the Old Town San Diego Community Plan Update [OTSDCPU] Draft Program Environmental Impact Report [DPEIR]:

We appreciate the opportunity to provide input on the environmental effects of a plan for our community whose historic preservation and development is vitally important to the future of our community. We sincerely appreciate the efforts of City Staff, particularly Victoria White and Tate Galloway who worked long and diligently on this project, and together with all member consultants for bringing about the update of the OTSDCPU.

B4-1

The overall organization, context, and historiography gives a more complete view of the significance of the Old Town Community to be parallel to Plymouth, Massachusetts – a “first” of communities that continue to grow and share the story of our nascent beginning. We hope future generations will continue the dedicated work of activism, vision, and commitment to continue to preserve our vital resources for future generations.

Our comments have two objectives. The first is to comment on the adequacy of environmental analysis and secondly, various needed corrections related to grammar, history and labeling.

AREA ENVIRONMENTAL IMPACTS NOTED AND QUESTIONS

We concur with the analysis on Table S-1, Page S-8, that impacts on historic and tribal cultural resources would be significant and unavoidable, even after mitigation. This is particularly important in the Old Town community where the historical and cultural setting is the basis for economic and commercial activity.

B4-2

Also, concur with findings throughout section 5.3 historical and cultural resources, which the cultural sensitivity of Old Town is high, as are the potential for significant, and inmitigable, adverse impacts to resources. While most Old Town resources date from before 1973, and thus should expect to be covered by the 45 year review program, this program does not recognize contributors to future planned or potential districts and these elements could easily be altered or lost incrementally to cumulative impact. Old Town should identify a strategy to protect the integrity of resources, beyond the General Plan and recommend discussions with respective tribal leaders or Tribal Historic Preservation Officers (THPOs).

Letter B4 – Old Town San Diego Community Planning Group (3/15/2018)

B4-1: Comment noted.

B4-2: The George Marston Historic District, located north of Juan Street and east of the Presidio Hills Golf Course, was the only potential historic district identified in the survey. This potential district is comprised of 25 properties constructed between 1938 and 1955. All potentially contributing resources/properties within the potential historic district would be subject to the City’s review of properties 45 years old or older under SDMC Section 143.0212. If the building were found potentially eligible for individual historic designation, it would be protected through this review process. In addition, it is the City’s intent to intensively survey the George Marston Historic District, and to prepare and process a historic district nomination, consistent with Policy HP-2.5 of the Historic Preservation Element in the Draft Community Plan. While the processing of this district is not included in the current 2017-2022 historic district work program, it will be included in a future district work program. The City acknowledges the potential for individual contributing resources to be adversely altered between the time of the adoption of the Draft Community Plan and the preparation and processing of the district nomination, which is reflected in the PEIR’s findings of significant and unavoidable impacts related to historical resources.

QUESTIONS

B4-3 1. The Adopted Community Plan, the PDO and the Community Plan Update all are in timeline sequence and incorporates much of the existing regulatory framework. What is the assurance now, with the Old Town Community Plan Update recently completed and now to be finalized as approved, but yet, follows under the umbrella of the City of San Diego's General Plan will be affected from the newly adopted City-wide emphasis to expedite developers projects that assure affordable housing to include those below the poverty line are now no longer required to include parking spaces, thus impacting on street availability. What are the assurances the Old Town Community Plan Update will remain as the guiding ordinance to structure urban auto and housing density?

B4-4 2. The Urban Greening mission statement is to provide urban forest canopies throughout the City of San Diego, and in the Community Plan Update assures the preservation of mature trees within their communities. During the summer of 2016, the Juan Street improvement project saw the unapproved removal of over two-dozen mature pepper trees. The Old Town Community Planning Group formed a team of consultants who diligently mitigated with all stakeholders to replace the mature pepper trees with new pepper trees. What prevents another reoccurrence, regardless if the Community Plan Update assures the protection and preservation of mature trees?

CORRECTIONS

Pages 17 and 18 require minor corrections:

B4-5 The Estudillo House was reconstructed by Hazel Wood Waterman on behalf of J. Spreckles c. 1910, and later restored by California State Parks in 1969. The Estudillo House is currently undergoing restoration once again. Page 18 has an incomplete sentence referring to the discontinuation of the cemetery in 1880.

B4-6 Corrections for the CA State Park, Adobe Chapel, and El Campo Santo are suggested as the following. In Figure 3-2, the State Park should be listed as such instead of the "Historic Core," which actually extends down San Diego Avenue and includes more than the State Park. The Adobe Chapel is City parkland, and not County parkland as referenced in Figures 3-1 and 3-2. Third, El Campo Santo is not a "pocket park" and reference to this sacred burial site as a pocket park disrespects those buried within it. Language referencing this site needs to be sensitive to the cultural displacement felt by many of the descendants whose families are located here. We recommend "cemetery" to be used within the park zone.

Page 5.2-6:

B4-7 (b) Bicycle Facilities, correction should read "Congress Street to San Diego Avenue."

Again, we thank you for this opportunity to comment on the DPEIR and look forward to receiving your responses to our comments.

Sincerely,

Ann Dahlkamp
Old Town San Diego Community Planning Group, Chair

CC: Hon. Chris Ward, City of San Diego Councilmember, District 3
Alyssa Muto, Interim Director, Planning Department
Vickie White, Senior Planner, Planning Department
Vanessa Bernal, Director of Office Admin. Old Town, District 3 Staff

B4-3: Comment noted. This comment does not address the adequacy of the analysis presented in the Draft PEIR; however, comments related to the Draft Community Plan and Old Town San Diego Planned District Ordinance (PDO) will be addressed in an attachment to the Planning Commission Staff Report.

B4-4: Comment noted. This comment does not address the adequacy of the analysis presented in the Draft PEIR; however, comments related to the Draft Community Plan will be addressed in an attachment to the Planning Commission Staff Report.

B4-5: Please see the response to comment B3-4.

B4-6: Please see the response to comment B3-5.

B4-7: The bottom of page 5.2-6, (b) Bicycles Facilities, has been corrected in the Final PEIR to read "...the San Diego Regional Bike Plan identifies Congress Street to San Diego Avenue as a regional connection..."

TABLE OF CONTENTS

<u>Section</u>	<u>Page</u>
Acronyms	xi
Executive Summary	S-1
S.1 Proposed Project.....	S-1
S.1.1 Project Location and Setting.....	S-1
S.1.2 Project Description.....	S-2
S.2 Project Objectives.....	S-2
S.3 Areas of Controversy.....	S-3
S.4 Project Alternatives.....	S-3
S.4.1 No Project Alternative (Adopted Community Plan).....	S-4
S.4.2 Alternative 1.....	S-4
S.4.3 Alternative 2.....	S-5
S.4.4 Environmentally Superior Alternative.....	S-5
S.5 Summary of Significant Impacts and Mitigation Measures that Reduce the Impact.....	S-5
Chapter 1.0 Introduction	1-1
1.1 PEIR Purpose and Intended Uses.....	1-1
1.2 PEIR Legal Authority.....	1-2
1.2.1 Lead Agency.....	1-2
1.2.2 Responsible and Trustee Agencies.....	1-2
1.3 EIR Type, Scope and Content, and Format.....	1-4
1.3.1 Type of EIR.....	1-4
1.3.2 PEIR Scope and Content.....	1-4
1.3.3 PEIR Format.....	1-6
1.3.4 Incorporation by Reference.....	1-7
1.4 PEIR Process.....	1-8
1.4.1 Draft PEIR.....	1-8
1.4.2 Final PEIR.....	1-9
Chapter 2.0 Environmental Setting	2-1
2.1 Regional Location.....	2-1
2.2 Project Location.....	2-4
2.3 Existing Physical Characteristics.....	2-4
2.3.1 Land Use.....	2-4
2.3.2 Transportation and Circulation.....	2-8
2.3.3 Historical and Tribal Cultural Resources.....	2-10
2.3.4 Geologic Conditions.....	2-15
2.3.5 Noise.....	2-20
2.3.6 Health and Safety.....	2-23
2.3.7 Hydrology and Water Quality.....	2-27
2.3.8 Visual Effects and Neighborhood Character.....	2-31
2.3.9 Air Quality.....	2-32

<u>Section</u>	<u>Page</u>
2.3.10 Greenhouse Gas Emissions	2-35
2.3.11 Public Services and Facilities	2-36
2.3.12 Public Utilities	2-39
2.3.13 Biological Resources	2-47
2.3.14 Paleontology	2-55
Chapter 3.0 Project Description	3-1
3.1 Introduction	3-1
3.2 Relationship to the General Plan	3-2
3.3 Project Objectives	3-2
3.4 Project Description	3-3
3.4.1 Community Plan Elements.....	3-4
3.4.2 Land Development Code Amendments.....	3-13
3.5 Environmental Design Considerations.....	3-15
3.5.1 Sustainability.....	3-15
3.5.2 Sub-Districts and Proximity to Transit.....	3-15
3.5.3 Transit	3-15
3.5.4 Recreation.....	3-15
3.5.5 Urban Runoff/Water Quality.....	3-15
3.5.6 Diversity and Affordability of Housing	3-16
3.5.7 Bicycle Network.....	3-16
3.5.8 Pedestrian-Oriented Building and Site Design	3-16
3.5.9 Improved Transportation Network and Increased Alternative Modes of Transportation	3-16
3.5.10 Energy Efficiency in Buildings.....	3-17
3.5.11 Air Quality.....	3-17
3.5.12 Urban Forestry and Landscaping.....	3-17
3.6 Plan Projections	3-17
3.6.1 Old Town Land Use Distribution	3-17
3.6.2 Future Actions Associated with the Proposed CPU.....	3-19
Chapter 4.0 Regulatory Framework	4-1
4.1 Land Use	4-1
4.1.1 Local.....	4-1
4.2 Transportation and Circulation.....	4-7
4.2.1 State.....	4-7
4.2.2 Local.....	4-8
4.3 Historical and Tribal Cultural and Resources	4-9
4.3.1 Federal	4-9
4.3.2 State.....	4-10
4.3.3 Local.....	4-11
4.4 Geologic Conditions	4-13
4.4.1 State.....	4-13
4.4.2 Local.....	4-14

<u>Section</u>	<u>Page</u>
4.5	Noise 4-15
4.5.1	State 4-15
4.5.2	Local 4-15
4.6	Health and Safety 4-19
4.6.1	Federal 4-19
4.6.2	State 4-20
4.6.3	Local 4-21
4.7	Hydrology/Water Quality 4-23
4.7.1	Federal 4-23
4.7.2	State 4-24
4.7.3	Local 4-25
4.8	Visual Effects and Neighborhood Character 4-27
4.8.1	State 4-27
4.8.2	Local 4-27
4.9	Air Quality 4-28
4.9.1	Federal 4-28
4.9.2	State 4-30
4.10	Greenhouse Gas Emissions 4-32
4.10.1	Federal 4-32
4.10.2	State 4-34
4.10.3	Local 4-39
4.11	Public Services and Facilities 4-40
4.11.1	State 4-40
4.11.2	Local 4-40
4.12	Public Utilities 4-42
4.12.1	State 4-43
4.12.2	Local 4-43
4.13	Biological Resources 4-45
4.13.1	Federal 4-45
4.13.2	State 4-46
4.13.3	Local 4-46
4.14	Paleontological Resources 4-47
Chapter 5.0	Environmental Analysis 5-1
5.1	Land Use 5.1-1
5.1.1	Existing Conditions 5.1-1
5.1.2	Significance Determination Thresholds 5.1-1
5.1.3	Impact Analysis 5.1-2
5.1.4	Significance of Impacts 5.1-13
5.1.5	Mitigation Framework 5.1-14
5.2	Transportation and Circulation 5.2-1
5.2.1	Existing Conditions 5.2-1
5.2.2	Significance Determination Thresholds 5.2-9
5.2.3	Impact Analysis 5.2-11
5.2.4	Significance of Impacts 5.2-25

<u>Section</u>		<u>Page</u>
	5.2.5 Mitigation Framework.....	5.2-26
	5.2.6 Significance of Impacts after Mitigation	5.2-29
5.3	Historical and Tribal Cultural Resources.....	5.3-1
	5.3.1 Existing Conditions	5.3-1
	5.3.2 Methodology.....	5.3-1
	5.3.3 Significance Determination Thresholds	5.3-5
	5.3.4 Impact Analysis	5.3-6
	5.3.5 Significance of Impacts	5.3-12
	5.3.6 Mitigation Framework.....	5.3-12
	5.3.7 Significance of Impacts after Mitigation	5.3-18
5.4	Geologic Conditions	5.4-1
	5.4.1 Existing Conditions	5.4-1
	5.4.2 Significance Determination Thresholds	5.4-1
	5.4.3 Impact Analysis	5.4-2
	5.4.4 Significance of Impacts	5.4-8
	5.4.5 Mitigation Framework.....	5.4-9
5.5	Noise	5.5-1
	5.5.1 Existing Conditions	5.5-1
	5.5.2 Significance Determination Thresholds	5.5-6
	5.5.3 Methodology.....	5.5-6
	5.5.4 Impact Analysis	5.5-7
	5.5.5 Significance of Impacts	5.5-19
	5.5.6 Mitigation Framework.....	5.5-21
	5.5.7 Significance of Impacts after Mitigation	5.5-23
5.6	Health and Safety.....	5.6-1
	5.6.1 Existing Conditions	5.6-1
	5.6.2 Significance Determination Thresholds	5.6-1
	5.6.3 Impact Analysis	5.6-2
	5.6.4 Significance of Impacts	5.6-4
	5.6.5 Mitigation Framework.....	5.6-5
5.7	Hydrology/Water Quality	5.7-1
	5.7.1 Existing Conditions	5.7-1
	5.7.2 Significance Determination Thresholds	5.7-1
	5.7.3 Impact Analysis	5.7-1
	5.7.4 Significance of Impacts	5.7-3
	5.7.5 Mitigation Framework.....	5.7-4
5.8	Visual Effects and Neighborhood Character	5.8-1
	5.8.1 Existing Conditions	5.8-1
	5.8.2 Significance Determination Thresholds	5.8-1
	5.8.3 Impact Analysis	5.8-1
	5.8.4 Significance of Impacts	5.8-5
	5.8.5 Mitigation Framework.....	5.8-6
5.9	Air Quality.....	5.9-1
	5.9.1 Existing Conditions	5.9-1

<u>Section</u>	<u>Page</u>
5.9.2	Significance Determination Thresholds 5.9-1
5.9.3	Impact Analysis 5.9-4
5.9.4	Significance of Impacts 5.9-12
5.9.5	Mitigation Framework..... 5.9-13
5.10	Greenhouse Gas Emissions 5.10-1
5.10.1	Existing Conditions 5.10-1
5.10.2	Significance Determination Thresholds 5.10-3
5.10.3	Impact Analysis 5.10-4
5.10.4	Significance of Impacts 5.10-8
5.10.5	Mitigation Framework..... 5.10-8
5.11	Public Services and Facilities 5.11-1
5.11.1	Existing Conditions 5.11-1
5.11.2	Significance Determination Thresholds 5.11-1
5.11.3	Impact Analysis 5.11-2
5.11.4	Significance of Impacts 5.11-9
5.11.5	Mitigation Framework..... 5.11-10
5.12	Public Utilities..... 5.12-1
5.12.1	Existing Conditions 5.12-1
5.12.2	Significance Determination Thresholds 5.12-1
5.12.3	Impact Analysis 5.12-1
5.12.4	Significance of Impacts 5.12-5
5.12.5	Mitigation Framework..... 5.12-7
5.13	Biological Resources..... 5.13-1
5.13.1	Existing Conditions 5.13-1
5.13.2	Significance Determination Thresholds 5.13-3
5.13.3	Impact Analysis 5.13-4
5.13.4	Significance of Impacts 5.13-10
5.13.5	Mitigation Framework..... 5.13-11
5.14	Paleontological Resources 5.14-1
5.14.1	Existing Conditions 5.14-1
5.14.2	Significance Determination Thresholds 5.14-1
5.14.3	Impact Analysis 5.14-2
5.14.4	Significance of Impacts 5.14-3
5.14.5	Mitigation Framework..... 5.14-3
5.14.6	Significance of Impacts after Mitigation 5.14-4
Chapter 6.0	Cumulative Impacts 6-1
6.1	Introduction 6-1
6.2	Cumulative Analysis Setting and Methodology..... 6-2
6.2.1	Plans and Programs Evaluated for Cumulative Impacts 6-3
6.3	Assessment of Cumulative Impacts..... 6-4
6.3.1	Land Use..... 6-5
6.3.2	Transportation and Circulation..... 6-5
6.3.3	Historical and Tribal Cultural Resources 6-5
6.3.4	Geologic Conditions..... 6-6

<u>Section</u>	<u>Page</u>
6.3.5 Noise	6-6
6.3.6 Health and Safety	6-6
6.3.7 Hydrology/Water Quality	6-6
6.3.8 Visual Effects and Neighborhood Character	6-7
6.3.9 Air Quality and Odor	6-7
6.3.10 Greenhouse Gas Emissions	6-8
6.3.11 Public Services and Facilities	6-8
6.3.12 Public Utilities	6-9
6.3.13 Biological Resources	6-10
6.3.14 Paleontological Resources	6-10
Chapter 7.0 Other Mandatory Discussion Areas	7-1
7.1 Growth Inducement	7-1
7.2 Effects Found Not To Be Significant	7-3
7.2.1 Agricultural Resources	7-3
7.2.2 Mineral Resources	7-4
7.2.3 Population and Housing	7-4
7.2.4 Energy	7-5
7.3 Unavoidable Significant Environmental Impacts	7-7
7.4 Significant Irreversible Environmental Changes	7-7
Chapter 8.0 Alternatives	8-1
8.1 No Project Alternative (Adopted Community Plan)	8-5
8.1.1 Description	8-5
8.1.2 Analysis of No Project Alternative (Adopted Community Plan)	8-8
8.2 Alternative 1	8-15
8.2.1 Description	8-15
8.2.2 Analysis of Alternative 1	8-16
8.3 Alternative 2	8-22
8.3.1 Description	8-22
8.3.2 Analysis of Alternative 2	8-23
8.4 Environmentally Superior Alternative	8-30
Chapter 9.0 References Cited	9-1
Chapter 10.0 Individuals and Agencies Consulted	10-1
Chapter 11.0 Certification	11-1
City of San Diego	11-1
PEIR Preparers	11-2
Technical Appendices Preparers	11-2

LIST OF APPENDICES

Appendix

A	Notice of Preparation and Comment Letters
B	Transportation Impact Study
C	Mobility Study
D	Historic Context & Survey Report
E	Prehistoric Cultural Resources Report
F	Seismic and Geologic Technical Background Report
G	Noise Technical Report
H	Air Quality Technical Report
I	Greenhouse Gas Emissions Technical Report
J	Hazardous Materials Technical Study
K	Public Services Correspondence
L	Water Supply Assessment
M	Paleontological Resource Assessment

LIST OF FIGURES

<u>Figure</u>		<u>Page</u>
2-1	Regional Location	2-2
2-2	Old Town Community Plan Area	2-3
2-3	Existing Land Use	2-6
2-4	Geologic Conditions	2-17
2-5	Geologic Hazards and Faults	2-18
2-6	Watersheds	2-29
2-7	Existing Vegetation Communities and Land Cover Types	2-48
3-1	Proposed Land Use Map	3-6
3-2	Proposed Community Sub-Districts	3-9
3-3	Existing and Planned Street Classifications	3-12
5.1-1	SDIA Airport Influence Area	5.1-10
5.1-2	SDIA Airspace Protection Boundary	5.1-11
5.1-3	SDIA Overflight Notification Area	5.1-12
5.2-1	Existing and Planned Bicycle Facilities	5.2-8
5.2-2	Planned Transit Services	5.2-22
5.2-3	Planned Pedestrian Services	5.2-24
5.3-1	George Marston Historic District	5.3-3
5.3-2	Location of Potentially Eligible City Register Designated Historic Resources	5.3-4
5.5-1	Noise Measurement Locations	5.5-2
5.5-2	Existing Traffic Noise Contours	5.5-5
5.5-3	Future Traffic Noise Contours	5.5-11
5.11-1	Parks, Recreation Facilities, and Open Space	5.11-4
5.13-1	Biological Study Area	5.13-2
5.13-2	MHPA and Open Space Areas	5.13-9
8-1	No Project Alternative: Adopted Community Plan Land Use	8-7
8-2	Alternative 1 Land Use	8-17
8-3	Alternative 2 Land Use	8-24

LIST OF TABLES

<u>Table</u>	<u>Page</u>
2-1	Existing (2017) Land Uses – Old Town2-5
2-2	Bicycle Facilities Classification System2-10
2-3	Typical Sound Levels in the Environment and Industry2-22
2-4	Hazardous Materials Sites in Old Town2-25
2-5	Summary of Air Quality Measurements Recorded at the San Diego–1110 Beardsley Street Monitoring Station2-34
2-6	California GHG Emissions by Sector in 1990, 2008, and 2012.....2-35
2-7	Historic Imported, Local, and Recycled Water Demands to Public Utilities Department2-40
2-8	Vegetation Communities and Land Cover Types within the Biological Study Area2-47
2-9	Special-Status Plant and Wildlife Species Documented or with Potential to Occur within the Biological Study Area2-51
2-10	Paleontological Monitoring Determination Matrix2-59
3-1	Project Components3-1
3-2	Old Town CPU Proposed Land Use Designations3-5
3-3	Existing and Proposed CPU Assumed Land Use Build-Out in Old Town3-18
3-4	Residential Development: Existing and Proposed CPU3-18
3-5	Non-Residential Development: Existing and Proposed CPU3-19
4-1	City of San Diego Land Use – Noise Compatibility Guidelines (Table NE-3)4-16
4-2	San Diego Property Line Noise Level Limits4-18
4-3	Ambient Air Quality Standards4-29
4-4	Deployment Measures to Address Future Growth by Population Density per Square Mile....4-42
4-5	Deployment Measures to Address Future Growth by Population Clusters4-42
5.1-1	Proposed CPU Policies Related to Land Use5.1-2
5.2-1	City of San Diego Roadway Segment Capacity and Level of Service5.2-3
5.2-2	Level of Service Criteria for Intersections.....5.2-4
5.2-3	Level of Service Criteria for Freeway Segment Analysis5.2-5
5.2-4	Existing Freeway Ramp Metering.....5.2-6
5.2-5	Significance Criteria for Facilities in Study Area.....5.2-10
5.2-6	Summary of Roadway Segment Analysis5.2-13
5.2-7	Summary of Intersection Analysis5.2-15
5.2-8	Summary of Freeway Segment Level of Service5.2-17
5.2-9	Peak Hour Ramp Metering Analysis – Horizon Year Conditions5.2-20
5.3-1	Contributing Parcels Identified in the Old Town Historic Resource Survey for the George Marston Historic District.....5.3-8
5.4-1	Deterministic Earthquake Ground Shaking Parameters for Potentially Critical Earthquake Faults.....5.4-3
5.4-2	Estimated Probabilistic Earthquake Ground Acceleration Parameters in the Project Area ...5.4-4
5.5-1	Noise Measurements – Old Town5.5-3
5.5-2	Maximum Vibration Levels for Construction Equipment for Potential Damage and Annoyance.....5.5-7
5.5-3	Increases in Ambient Noise for the Proposed CPU Area.....5.5-8

<u>Table</u>	<u>Page</u>
5.5-4	Future Vehicle Traffic Noise CNEL Contour Distances for the Proposed Old Town CPU Area.....5.5-12
5.5-5	Existing Predicted Railway Noise Levels.....5.5-14
5.5-6	Future (2021) Predicted Railway Noise Levels5.5-15
5.5-7	Vibration Source Levels for Construction Equipment and Applicable Criteria5.5-18
5.9-1	Air Quality Impact Screening Levels.....5.9-2
5.9-2	2018 Maximum Daily Unmitigated Construction Emissions (pounds/day).....5.9-6
5.9-3	Total Operational Emissions for the Proposed Old Town CPU Area5.9-8
5.10-1	GHG Emissions for the Old Town Community Plan Area (MT CO ₂ e per Year)5.10-4
5.11-1	Population-Based Parks and Recreation Facilities5.11-5
5.11-2	Summary of Existing and Proposed Population-Based Parks and Recreation Facilities.....5.11-6
5.11-3	Old Town Student Generation Rates from Existing Housing Units5.11-8
5.11-4	Old Town Potential Student Generation Rates from Future Additional Housing Units5.11-9
6-1	San Diego Region Growth Projections for Cumulative Analysis6-3
6-2	Planning Documents Used for Cumulative Analysis6-3
6-3	Proposed CPU Cumulative Analysis Setting6-4
8-1	Comparison of Future Land Uses.....8-3
8-2	Matrix Comparison of Project Alternatives and Proposed CPU8-4
8-3	Issues Identified in the Adopted Old Town Community Plan8-5
8-4	Amendments to the 1987 Old Town Community Plan8-6
8-5	Comparison of the No Project Alternative and the Proposed CPU Future Land Uses8-8
8-6	No Project Alternative (Adopted Community Plan) Planned Circulation Improvements8-10
8-7	Comparison of Alternative 1 and the Proposed CPU Future Land Uses8-16
8-8	Comparison of Alternative 2 and the Proposed Old Town CPU8-23

Acronyms

$\mu\text{g}/\text{m}^3$	micrograms per cubic meter
°F	Fahrenheit
AAQS	ambient air quality standards
AB	Assembly Bill
ADA	Americans with Disabilities Act
ADT	average daily traffic
af	artificial fill
AIA	airport influence area
ALUC	Airport Land Use Commission
ALUCP	Airport Land Use Compatibility Plan
ANSI	American National Standards Institute
APCD	Air Pollution Control District
AST	aboveground storage tank
BAU	Business As Usual
BMP	best management practice
BNSF	Burlington North Santa Fe
BSA	Biological Study Area
CAA	Clean Air Act
CAAQS	California Ambient Air Quality Standards
CAFE	Corporate Average Fuel Economy
CalARP	California Accidental Release Prevention
CalEEMod	California Emissions Estimator Model
CalGreen	California Green Building Standards Code
CalRecycle	California Department of Resources Recycling and Recovery
Caltrans	California Department of Transportation
CAP	Climate Action Plan
CARB	California Air Resources Board
CBC	California Building Code
CCAP	Climate Change Action Plan
CCR	California Code of Regulations
CDC	California Department of Conservation
CDFW	California Department of Fish and Wildlife
CDP	Coastal Development Permit
CE	Conservation Element
CEC	California Energy Commission
CEQA	California Environmental Quality Act
CESA	California Endangered Species Act
CFR	Code of Federal Regulations
CH ₄	methane

CHRIS	California Historical Resources Information System
CIP	Capital Improvements Program
City	City of San Diego
CN	Commercial-Neighborhood
CNDDDB	California Natural Diversity Database
CNEL	community noise equivalent level
CNPS	California Native Plant Society
CO	carbon monoxide
CO ₂	carbon dioxide
CPU	Community Plan Update
CPUC	California Public Utilities Commission
CRHR	California Register of Historical Resources
CRPR	California Rare Plant Rank
CTC	California Transportation Commission
CUPA	Certified Unified Program Agency
dB	decibel
dBA	A-weighted decibel
DEH	Department of Environmental Health
DIF	Development Impact Fee
DOT	U.S. Department of Transportation
DPM	diesel-exhaust particulate matter or diesel particulate matter
DTSC	Department of Toxic Substances Control
du/ac	dwelling units per acre
EB	Eastbound
EIR	Environmental Impact Report
EMFAC2014	Emission Factor model
EMS	Emergency Medical Services
EMT	emergency medical technician
EO	executive order
EOC	Emergency Operations Center
EOP	edge of pavement
ESA	Endangered Species Act
ESL	Environmentally Sensitive Lands
FAA	Federal Aviation Administration
FAR	floor area ratio
FHWA	Federal Highway Administration
FINDS	Facility Index System
FRA	Federal Railroad Administration
ft	feet
FTA	Federal Transit Administration
g	gravity
GB	Green Building
GHG	greenhouse gas
GPA	Galvin Preservation Associates Inc.
gpd	gallons per day
GWP	global warming potential

H&SC	Health and Safety Code
HAZMIT	Hazard Mitigation Plan
HCM	Highway Capacity Manual
HFC	hydrofluorocarbons
HMBP	Hazardous Materials Business Plan
HMD	Hazardous Materials Division
HMP	Hydromodification Management Plan
HRB	Historical Resources Board
HRR	Historical Resource Regulations
HVAC	heating, ventilation, and air-conditioning
Hz	Hertz
I-5	Interstate 5
I-8	Interstate 8
IA	Implementing Agreement
IFS	Impact Fee Study
IP	Industrial-Park
IPCC	Intergovernmental Panel on Climate Change
ISO	Independent System Operator
ITC	Intermodal Transit Center
ITS	Intelligent Transportation Systems
IWRP	Integrated Water Resources Plan
JRMP	Jurisdictional Runoff Management Plan
kHz	kilo-Hertz
LCFS	Low Carbon Fuel Standard
LCP	Local Coastal Plan
LD	Larson Davis
LDC	Land Development Code
LDM	Land Development Manual
L_{eq}	equivalent noise level
LEV III	Low Emission Vehicle III
LID	Low Impact Development
L_{max}	maximum noise level
LOS	Level of Service
LOSSAN	Los Angeles-San Diego-San Luis Obispo
LRT	Light Rail Transit
LS	less than significant
LU	land use
LUST	Leaking Underground Storage Tank
MBTA	Migratory Bird Treaty Act
MCRD	Marine Corps Recruitment Depot
ME	Mobility Element
MHMP	Multi-Jurisdictional Hazard Mitigation Plan
MHPA	Multi-Habitat Planning Area
min	minutes
MMI	Modified Mercalli Intensity
MMRP	Mitigation Monitoring and Reporting Program

MMT CO ₂ E	million metric tons of CO ₂ equivalent
MOE	Measures of Effectiveness
mpg	miles per gallon
mph	miles per hour
MPL	Multiple Property Listing
MS4	Municipal Separate Storm Sewer System
MSCP	Multiple Species Conservation Program
MSL	mean sea level
MT CO ₂ e	metric tons of carbon dioxide equivalent
MTS	Metropolitan Transit System
MW	megawatts
MWD	Metropolitan Water District
N/A	not applicable
N ₂ O	nitrous oxide
NA	not available
NAAQS	national ambient air quality standards
NAHC	Native American Heritage Commission
NB	Northbound
NCWR	North City Water Reclamation Plant
NHTSA	National Highway Traffic Safety Administration
NO ₂	nitrogen dioxide
NOP	Notice of Preparation
NO _x	oxides of nitrogen
NPDES	National Pollutant Discharge Elimination System
NRC	U.S. Nuclear Regulatory Commission
NRHP	National Register of Historic Places
NTC	Naval Training Center
O ₃	ozone
OES	Office of Emergency Services
OSHA	Occupational Safety and Health Administration
Pb	lead
PDO	Planned District Ordinance
PEIR	Program Environmental Impact Report
PFC	perfluorocarbons
PFFP	Public Facilities Financing Plan
PM ₁₀	particulate matter less than 10 microns in diameter
PM _{2.5}	particulate matter less than 2.5 microns in diameter
ppb	parts per billion
ppm	parts per million
PPV	peak particle velocity
PUD	Public Utilities Department
PWD	Public Works Department
QHP	Quieter Home Program
RAQS	Regional Air Quality Strategy
RCP	Regional Comprehensive Plan for the San Diego Region
RCRA-SQG	Resource Conservation and Recovery Small Quantity Generators

RP	Regional Plan
RPS	Renewables Portfolio Standard
RTP/SCS	Regional Transportation Plan/Sustainable Communities Strategy
RUWMP	Regional Urban Water Management Plan
RWQCB	Regional Water Quality Control Board
SANDAG	San Diego Association of Governments
SB	Senate Bill
SB	Southbound
SBWRP	South Bay Water Reclamation Plant
SCAQMD	South Coast Air Quality Management District
SCIC	South Coastal Information Center
SCP	Site Cleanup Program
SDAB	San Diego Air Basin
SDCWA	San Diego County Water Authority
SDG&E	San Diego Gas & Electric
SDIA	San Diego International Airport
SDMC	San Diego Municipal Code
SDPL	San Diego Public Library
SDUSD	San Diego Unified School District
sec/veh	seconds per vehicle
SF	square feet
SF ₆	sulfur hexafluoride
SFHA	Special Flood Hazard Area
SHPO	State Historic Preservation Office
SIP	State Implementation Plan
SLM	Sound Level Meters
SMAQMD	Sacramento Metropolitan Air Quality Management District
SN	serial numbers
SO ₂	sulfur dioxide
SoCalGas	Southern California Gas Company
SPAWAR	Space and Naval Warfare Systems Command
ST	short term
STC	Sound Transmission Class
SU	significant and unavoidable
SWEEPS	Statewide Environmental Evaluation and Planning System
SWRCB	State Water Resources Control Board
TAC	toxic air contaminant
TCM	Transportation Control Measure
TDM	Transportation Demand Management
TERPS	Terminal Instrument Procedures
TIS	Transportation Impact Study
TMDL	total maximum daily load
TNM	Traffic Noise Model
TPA	Transit Priority Areas
TSS	Threshold Siting Surface
U.S.C.	United States Code

UD	Urban Design
UDC	Unified Disaster Council
USACE	U.S. Army Corps of Engineers
USDA	U.S. Department of Agriculture
USEPA	U.S. Environmental Protection Agency
USFWS	U.S. Fish and Wildlife Service
UST	Underground Storage Tank
UWMP	Urban Water Management Plan
v/c	volume-to-capacity
VAP	Voluntary Assistance Program
veh/hr	vehicles per hour
VMT	vehicle miles traveled
VOC	volatile organic compounds
WB	Westbound
WBWG	Western Bat Working Group
WMA	Watershed Management Area
WMP	Waste Management Plan
WQIP	Water Quality Improvement Plan
WSA	Water Supply Assessment



Executive Summary

S.1 Proposed Project

S.1.1 Project Location and Setting

The proposed Old Town San Diego Community Plan Update (proposed CPU; proposed Old Town CPU) area is centrally located to the northwest of Downtown San Diego and southeast of Mission Bay. The proposed Old Town CPU area lies between the Midway Pacific-Highway Community Plan area to the west and south, the Uptown Community Plan area to the east, and the Mission Valley Community Plan area to the north.

The proposed CPU area encompasses roughly 275 acres. I-8 functions as the northern boundary of the proposed CPU area, while I-5 provides the western boundary; the Mission Hills/Uptown hillsides form the southern and eastern boundaries of the proposed CPU area.

The Old Town community is the site of initial settlement of the City of San Diego and is the birthplace of the State of California. The area's location along the San Diego River, topography, and proximity to the San Diego Bay made it an ideal place for early settlers, and it remained the administrative and economic center of the City of San Diego until 1869. In the mid-nineteenth century, a dike was constructed along Old Town's northern boundary to direct the San Diego River into False Bay (now Mission Bay) to control periodic flooding and silt deposits in San Diego Bay, and in the twentieth century, construction associated with I-8 further cut the proposed Old Town CPU area off from the San Diego River floodplain.

Development of regional transportation infrastructure in the proposed CPU area began in the nineteenth century with construction of the California Southern Railroad and, later, a local electric street railway system. Currently, Old Town San Diego is the location of a major rail and transit station. The Old Town Transit Center serves the San Diego Metropolitan Transit System (MTS) light rail line and buses, as well as the Amtrak Pacific Surfliner, which provides rail service as far north as San Luis Obispo, California. As the use of the automobile increased in the San Diego area in the early twentieth century, construction of highways began, including the highways that would be designated in 1925 as U.S. Highway 101 (still

existing in part as Pacific Highway) and later I-5 and I-8. I-8 and I-5 run along the community's northern and eastern sides, connecting Downtown San Diego to other communities in the City and the region.

The proposed CPU area is predominantly urbanized and is generally characterized by a mix of commercial, residential, park, and institutional uses. Commercial development of the proposed Old Town CPU is generally tourist-oriented and includes restaurant and drinking establishments, retail stores, hotels, and museums. Additional non-residential uses in the community include office space, public parking facilities, and the Caltrans District 11 administrative and operational facility.

S.1.2 Project Description

The project includes the comprehensive update to the 1987 Old Town San Diego Community Plan (adopted Community Plan), which is intended to guide development through 2035. For facility planning, technical evaluation, and environmental review purposes, build-out is assumed to occur in 2035. The proposed CPU provides detailed policy direction to implement the General Plan with respect to the distribution and arrangement of land uses (public and private), the local street and transit network, prioritization and provision of public facilities, community-wide and site-specific architectural and urban design guidelines, and recommendations to preserve and enhance natural open space and historic and cultural resources within the Old Town community.

The Old Town community is characterized by its significant historical importance for the City of San Diego. Old Town is a historic and cultural destination for visitors, as well as a neighborhood incorporating residential, commercial, and institutional uses.

The guiding principles for the proposed CPU include the vision for Old Town as an attractive, vibrant, and healthy community that respects the importance of Old Town San Diego as the site of initial settlement in the City and the birthplace of the State of California. The proposed CPU also envisions the community as a pedestrian-oriented historical small town, and provides policy direction that new buildings and uses enhance the community character and livability with an emphasis on design that respects the history of the community and encourages pedestrian activity. The proposed CPU identifies the need for a community with a balance of residential and visitor-serving uses. The proposed CPU identifies that the community's mix of pedestrian-oriented residential, commercial, and public space served by the Old Town Transit Center is consistent with the "City of Villages" General Plan concept.

The proposed CPU includes an Introduction and Implementation chapter, and includes the following elements: Historic Preservation; Land Use; Mobility; Urban Design; Economic Prosperity; Public Facilities, Services and Safety; Recreation; Conservation; and Noise. Chapter 11 (Implementation) of the proposed CPU describes potential financing methods for public improvement projects.

S.2 Project Objectives

In accordance with California Environmental Quality Act (CEQA) Guidelines Section 15124, the following objectives were identified to outline the underlying purpose for the project. These objectives assisted the City as lead agency in developing a reasonable range of alternatives to evaluate in this PEIR, and will ultimately aid the lead agency in preparing findings and overriding considerations, if necessary. The primary objectives for the project are:

- Maintain and enhance the pre-1872 community character of Old Town through land use and urban design policies and development regulations;
- Enhance the Core Sub-District as the pedestrian-oriented commercial center of the community;
- Improve the integration between the Core Sub-District and Old Town San Diego State Historic Park;
- Maintain a balance between visitor-serving uses and residential uses;
- Increase the availability of housing in proximity to transit;
- Enhance facilities and amenities within parks and recreation sites in the community;
- Improve pedestrian and bicycle linkages to adjacent communities and amenities including the San Diego River and Old Town Transit Center;
- Preserve the community's historical, archaeological and tribal cultural resources; and
- Identify future alternative uses for the Fremont School/Ballard Parent Center site.

S.3 Areas of Controversy

Areas of controversy include parking availability, retaining residential uses, and preserving community character and small scale development. Environmental impacts classified as significant and unavoidable that may generate controversy have been identified in the resource topics of transportation and circulation, historical and tribal cultural resources, noise, and paleontological resources, which are described in Chapters 5.2, 5.3, 5.5, and 5.14, respectively.

S.4 Project Alternatives

To fully evaluate the environmental effects of proposed projects, CEQA mandates that alternatives to the proposed project be analyzed. Section 15126.6 of the state CEQA Guidelines requires the discussion of “a range of reasonable alternatives to the project, or to the location of the project, which would feasibly attain most of the basic objectives of the project but would avoid or substantially lessen any of the significant effects of the project” and the evaluation of the comparative merits of the alternatives. The alternatives discussion is intended to “focus on alternatives to the project or its location which are capable of avoiding or substantially lessening any significant effects of the project,” even if these alternatives would impede to some degree the attainment of the project objectives.

Alternatives to the proposed CPU are evaluated in Chapter 8.0 of this PEIR. The evaluations analyze the ability of each alternative to further reduce or avoid significant environmental effects of the proposed CPU. Each major issue area included in the impact analysis of this PEIR has been given consideration in the alternatives analysis. This PEIR evaluates three alternatives to the project: No Project Alternative (adopted Community Plan); Alternative 1, and Alternative 2.

S.4.1 No Project Alternative (Adopted Community Plan)

Under the No Project Alternative, the adopted 1987 Old Town San Diego Community Plan would continue to guide development. The No Project Alternative would consist of the adopted Community Plan land use designations as they apply today, including all amendments to the Community Plan from its original adoption in 1987 to the most recent amendment in 2001. The adopted Community Plan land use designations seek to focus on the combination of tourist and residential development while establishing density standards that are consistent with the community's historical precedent. This balance of density within the community may result in lower density than what was currently present before the adoption of the 1987 Community Plan. There is a focus on design guidelines and public improvements to enhance the area's historical context and maintain the balance between the regional visitor-oriented facilities and the community resident-oriented needs. The adopted Community Plan also seeks to increase the possibility of residential construction by extending the residential land use zone and eliminating certain permitted uses within residential areas, such as churches, boarding and lodging, and group dwellings.

The No Project Alternative is generally very similar to the proposed CPU in that it shares similar goals related to retaining and enhancing the community's distinctive historical character, as well as recognizing the importance of the proposed CPU area as both a visitor destination and an established residential community. The proposed CPU would result in less Commercial - Retail floor area than the No Project Alternative. The assumed development under the proposed CPU would decrease the amount of Commercial - Retail floor area, which in turn would allow additional dwelling units to be developed in the form of mixed-use development. Otherwise, the land uses under the No Project Alternative are generally similar to the proposed CPU land uses.

S.4.2 Alternative 1

Land uses proposed under Alternative 1 would result in less residential density than the proposed CPU, specifically west of Pacific Highway (residential is permitted for 0-36 dwelling units per acre (du/ac) under Alternative 1 versus permitted for 0-73 du/ac under the proposed CPU), south of Congress Street (0-25 du/ac under Alternative 1 versus 0-36 du/ac under the proposed CPU), and in the Hortensia Sub-District (0-25 du/ac under Alternative 1 versus 0-54 du/ac under the proposed CPU). Under Alternative 1, the density of future development would be increased to 29 (du/ac in the Congress and Hortensia sub-districts generally southeast of Ampudia Street, and the Taylor Sub-District would change the industrial and residential land uses between Pacific Highway and the railroad to Mixed Commercial Residential – Medium at 36 du/ac. The other residential uses west of Pacific Highway would decrease in density from 0-73 du/ac under the proposed CPU and 0-36 du/ac under Alternative 1. The alternative includes all the other discretionary actions and proposed policies in the proposed CPU.

When compared to the proposed CPU, Alternative 1 reduces residential density development potential along Jefferson Street, San Diego Avenue, Arista Street, Ampudia Street, Old Town Avenue, and Hortensia Street from densities ranging from 36 to 54 du/ac, to 29 du/ac. When compared to the proposed CPU, Alternative 1 increases residential density development potential in the Congress and Hortensia sub-districts generally southeast of Ampudia Street. The total projected population under Alternative 1 would be 830 persons less than under the proposed CPU.

S.4.3 Alternative 2

Land uses proposed under Alternative 2 would result in less residential density than the proposed CPU, specifically west of Pacific Highway (residential is prohibited under Alternative 2 versus permitted for 0-73 du/ac under the proposed CPU), south of Congress Street (0-25 du/ac under Alternative 2 versus 0-36 du/ac under the proposed CPU), and in the Hortensia Sub-District (0-25 du/ac under Alternative 2 versus 0-54 du/ac under the proposed CPU). Alternative 2 does not include the increased residential density in the Hortensia Sub-District or the change from residential prohibited to residential permitted to 73 du/ac along Pacific Highway in the Taylor Sub-District. Alternative 2 would reduce multi-family development potential, result in a slight increase in area developed with single family residential uses, and slightly reduce the number of dwelling units allowed in conjunction with commercial – retail land uses. The total projected population under Alternative 2 would be 1,150 persons less than the proposed CPU.

S.4.4 Environmentally Superior Alternative

CEQA Guidelines Section 15126.6(e)(2) requires the identification of an environmentally superior alternative among the alternatives analyzed in an EIR. The guidelines also require that if the No Project Alternative is identified as the environmentally superior alternative, then another environmentally superior alternative must be identified.

Based on a comparison of the alternatives' overall environmental impacts and their compatibility with the proposed CPUs' goals and objectives, Alternative 2 is the environmentally superior alternative for this PEIR. While Alternative 2 would not reduce the significant and unavoidable impacts of the proposed CPU, it would slightly reduce impacts related to traffic circulation due to a lesser amount of ADT. At the same time, Alternative 2 would not achieve consistency with the General Plan's City of Villages strategy to the same extent as the proposed CPU because it would not provide higher residential densities to meet the needs of the future population. Alternative 2 would also achieve consistency with the Climate Action Plan (CAP) to a lesser degree since the land use plan would not take advantage of higher residential densities located near the Old Town Transit Center to the same extent as the proposed CPU.

S.5 Summary of Significant Impacts and Mitigation Measures that Reduce the Impact

Table S-1 summarizes the results of the environmental analysis including the potentially significant environmental impacts of the proposed CPU and proposed mitigation measures to reduce or avoid these impacts. Impacts and mitigation measures are organized by issue in Chapter 5.0, Environmental Analysis. Chapter 5.0 also includes discussions of proposed policies that would reduce identified impacts. Chapter 6.0, Cumulative Impacts, includes an analysis of cumulative impacts of the proposed CPU for each issue.

Pursuant to CEQA Guidelines Section 15126, all phases, or in the case of this project, discretionary actions associated with the proposed CPUs, are considered in this PEIR when evaluating potential impacts on the environment, including the construction of future development and operational phases to the extent possible at the program level. Impacts are identified as direct or indirect, short-term or long-term, and are assessed on a plan-to-ground basis. The plan-to-ground analysis addresses the changes or impacts that would result from implementation of the project compared to existing ground conditions.

**Table S-1
Summary of Significant Environmental Impacts**

Environmental Issue	Results of Impact Analysis	Mitigation	Impact Level After Mitigation
Land Use			
<p>Would the 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?</p>	<p>The project would be consistent with the General Plan and the City of Villages strategy. Furthermore, the policies developed for the proposed CPU associated with each of the elements were drafted in a manner that is consistent with the General Plan. Proposed revisions to the Old Town Planned District Ordinance and parking and signage requirements would be consistent with applicable environmental goals, objectives and guidelines of the General Plan. These proposed amendments are intended to encourage future development consistent with the proposed CPU.</p> <p>Future development in accordance with the proposed CPU would be required to comply with the Environmentally Sensitive Lands (ESL) Regulations. Future development in accordance with the proposed CPU would also be required to comply with the City's Historical Resource Regulations (HRR) to protect designated and eligible historical resources in the proposed CPU area. The proposed CPU incorporates the multi-modal strategy of the Regional Plan through the designation of a high-density mixed-use village. In addition, the proposed CPU includes policies related to land use, mobility, and circulation/transportation that promote the San Diego Forward <u>2015 Regional Plan</u> smart growth strategies. As the project would be consistent with applicable environmental goals, objectives, or guidelines of a General Plan and other applicable plans and regulations, no indirect or secondary environmental impact would result, and impacts would be less than significant. No mitigation is required.</p>	None Required	Less than Significant
<p>Would the project lead to the development or conversion of general plan or community plan designated open space or prime farmland to a more intensive land use, resulting in a physical division of the community?</p>	<p>The project would not convert open space or prime farm land. The project would not physically divide an established community. Community connectivity would be enhanced by policies and planned infrastructure improvements in the proposed CPU that improve pedestrian, bicycle, and transit access and amenities. Impacts would be less than significant, and no mitigation is required.</p>	None Required	Less than Significant
<p>Would the project conflict with the provisions of the City's Multiple Species Conservation Program (MSCP) Subarea Plan or other</p>	<p>Although the proposed CPU contains areas mapped within the Multi-Habitat Planning Area (MHPA) in Presidio Park, any subsequent projects implemented in accordance with the proposed CPU would be required to comply with the provisions of the Multiple</p>	None Required	Less than Significant

Table S-1 Summary of Significant Environmental Impacts			
Environmental Issue	Results of Impact Analysis	Mitigation	Impact Level After Mitigation
approved local, regional, or state habitat conservation plan?	Species Conservation Program (MSCP) Subarea Plan. Compliance with the San Diego Municipal Code (SDMC) and MSCP Subarea Plan would be assured during review of future project specific development proposals where ESL and the MHPA is present on-site, and therefore, implementation of the proposed CPU would not be in conflict with the MSCP Subarea Plan, and impacts would be less than significant.		
Would the project result in land uses which are not compatible with an adopted Airport Land Use Compatibility Plan (ALUCP)?	Although the Old Town community is within the San Diego International Airport (SDIA) Airport Influence Area (AIA) Review Area 2, the project would not result in impacts associated with the four compatibility concern areas. The proposed CPU and implementation actions will be <u>was</u> submitted to Airport Land Use Commission (ALUC) to obtain a consistency determination with the SDIA ALUCP, <u>and was deemed conditionally consistent as</u> future projects would be required to receive ALUC consistency determinations, as necessary, stating that the project is consistent with the SDIA ALUCP until such time as the City adopts regulations implementing the ALUCP or takes action to overrule the ALUC by a two-thirds vote. As a result, the project would not result in land uses that are incompatible with an adopted ALUCP. Therefore, impacts would be less than significant, and no mitigation is required.	None Required	Less than Significant
Transportation and Circulation			
Would the project result in an increase in projected traffic, which is substantial in relation to the existing traffic load and capacity of the street system including roadway segments, intersections, freeway segments, interchanges, or freeway ramps?	The proposed CPU would result in impacts to roadway segments, intersections, freeway segments, and ramp meters.	TRANS 5.2-1 through TRANS 5.2-8 , as described in Section 5.2, Transportation and Circulation, were identified to reduce significant impacts to roadways and intersections; however, as discussed in Section 5.2 of this PEIR, none are included in the proposed Impact Fee Study (IFS). Mitigation Measures TRANS 5.2-9 through TRANS 5.2-16 would be implemented by Caltrans <u>were identified</u> to reduce impacts to freeway segments and ramp meters; however, impacts to Caltrans facilities would remain significant and 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	Significant and Unavoidable

Table S-1 Summary of Significant Environmental Impacts			
Environmental Issue	Results of Impact Analysis	Mitigation	Impact Level After Mitigation
		<u>occurrence of the impact.</u>	
Would the project conflict with adopted policies, plans, or programs supporting alternative transportation?	The project would be consistent with adopted policies, plans, or programs supporting alternative transportation. Additionally, the project (including the proposed IFS) would provide planned alternative transportation facilities and policies that support improvements to pedestrian, bicycle, and transit facilities. Thus, the project would have a less than significant impact related to conflicts with adopted policies, plans, or programs supporting alternative transportation, and no mitigation is required.	None Required	Less than Significant
<i>Historical and Tribal Cultural Resources</i>			
Would implementation of the project result in an alteration, including the adverse physical or aesthetic effects and/or the destruction of a historic building (including an architecturally significant building), structure, object, or site?	Implementation of the project could result in an alteration of a historic building, structure, object, or site where an increase in density is proposed beyond the adopted Community Plan or current zoning (<i>Impact 5.3-1</i>). These impacts would be significant.	Mitigation Measure HIST 5.3-1 , as described in Section 5.3, Historical and Tribal Cultural Resources.	Significant and Unavoidable
Would implementation of the project result in a substantial adverse change in the significance of a prehistoric archaeological resource, a religious or sacred use site, or the disturbance of any human remains, including those interred outside of formal cemeteries?	Implementation of the project could adversely impact prehistoric or historic archaeological resources, including religious or sacred use sites and human remains (<i>Impact 5.3-2</i>). These impacts would be significant.	Mitigation Measure HIST 5.3-2 as described in Section 5.3, Historical and Tribal Cultural Resources.	Significant and Unavoidable
A substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code Section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California	Implementation of the project could adversely impact tribal cultural resources (<i>Impact 5.3-3</i>). These impacts would be significant.	Mitigation Measure HIST 5.3-2 as described in Section 5.3, Historical and Tribal Cultural Resources.	Significant and Unavoidable

Table S-1 Summary of Significant Environmental Impacts			
Environmental Issue	Results of Impact Analysis	Mitigation	Impact Level After Mitigation
<p>Native American tribe, and that is:</p> <p>1. Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code section 5020.1(k), or</p> <p>2. A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1. In applying the criteria set forth in subdivision (c) of Public Resources Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.</p>			
Geologic Conditions			
<p>Would the project expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving rupture of a known earthquake fault, strong seismic ground shaking, seismic-related ground failure, including liquefaction, or landslides?</p>	<p>Future projects located within the proposed Old Town CPU 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 uniformly applied development policies, including existing codes and standards. This regulatory framework includes a requirement for site-specific geotechnical investigations to identify potential geologic hazards or geotechnical concerns that would need to be addressed during grading and/or construction of a specific development project. Thus, impacts would be less than significant, and no mitigation is required.</p>	None Required	Less than Significant
<p>Would the project result in a substantial erosion or loss of topsoil?</p>	<p>SDMC Section 142.0146 requires grading work to incorporate erosion and siltation control measures in accordance with Chapter 14, Article 2, Division 4 (Landscape Regulations) and the standards established in the Land Development Manual. Conformance to such mandated City grading requirements would ensure that grading and construction operations for future projects located within the</p>	None Required	Less than Significant

**Table S-1
Summary of Significant Environmental Impacts**

Environmental Issue	Results of Impact Analysis	Mitigation	Impact Level After Mitigation
	proposed CPU would avoid significant soil erosion impacts. Furthermore, any development involving clearing, grading, or excavation that causes soil disturbance of 1 or more acres, or any project involving less than 1 acre that is part of a larger development plan, is subject to the National Pollutant Discharge Elimination System (NPDES) General Construction Storm Water Permit provisions. Additionally, any development of significant size within the City would be required to prepare and comply with an approved Storm Water Pollution Prevention Plan that would consider the full range of erosion control best management practices (BMPs), including any additional site-specific and seasonal conditions. Thus, impacts would be less than significant, and no mitigation is required.		
Would the project be located on a geologic unit or soil that is unstable or that would become unstable as a result of the project, and potentially result in an on- or off-site landslide, lateral spreading, subsidence, liquefaction, or collapse?	The risk associated with ground subsidence hazard in the proposed CPU area is low. Potential hazards associated with slope instability would be addressed by the site-specific recommendations contained within geotechnical investigations as required by the SDMC or other standards. Thus, impacts would be less than significant, and no mitigation is required.	None Required	Less than Significant
Would the project be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial risks to life or property?	A site-specific geotechnical investigation required for future projects within the proposed CPU area would be required by the SDMC or other standards to identify the presence of expansive soils and provide recommendations to be implemented during grading and construction to ensure that potential hazards associated with expansive soils are minimized. Thus, impacts would be less than significant, and no mitigation is required.	None Required	Less than Significant
Noise			
Would the project result in or create a significant increase in the existing ambient noise levels?	An increase in ambient vehicular traffic noise in the proposed CPU area would result from the future development projections of the project and increases in traffic due to regional growth. No significant increases in ambient noise levels were predicted to occur throughout the proposed Old Town CPU area; thus, ambient noise level increases as a result of the project would be less than significant. No mitigation is required.	None Required	Less than Significant
Would the project cause exposure of people to current or future	<u>Vehicular Noise</u>	<u>Vehicular Noise</u>	<u>Vehicular</u>

**Table S-1
Summary of Significant Environmental Impacts**

Environmental Issue	Results of Impact Analysis	Mitigation	Impact Level After Mitigation
<p>transportation noise levels which exceed standards established in the Noise Element of the General Plan?</p>	<p>In the proposed CPU area, noise levels for all land uses would typically be incompatible (i.e., greater than 75 dBA CNEL) closest to the freeways and specific segments of Pacific Highway. These areas are currently developed and the project would change land use designations in some of these areas. While land uses in these areas would be exposed to noise levels that exceed General Plan standards, Section B of the General Plan Noise Element requires future residential uses in areas above 70 dBA CNEL to include noise attenuation measures to ensure interior levels of 45 dBA CNEL and that they be located in an area where a community plan allows multi-family and mixed-use residential uses. For new construction above 75 dBA CNEL, extensive mitigation techniques will be needed to make the indoor environment acceptable to ensure interior levels of 45 dBA CNEL. An existing regulatory framework and review process exists for new discretionary development, requiring projects to demonstrate that exterior and interior noise levels would be compatible with City standards. Noise compatibility impacts associated with future discretionary projects implemented in accordance with the project would be less than significant with implementation of existing regulations and noise standards. However, in the case of ministerial projects, there is no procedure to ensure that exterior noise is adequately attenuated. Therefore, exterior noise impacts for ministerial projects located in areas that exceed the applicable land use and noise compatibility level would be potentially significant (<i>Impact 5.5-1</i>).</p> <p><u>Rail Noise</u></p> <p>Amtrak, Coaster, and freight train noise levels at the nearest planning area boundary and the nearest sensitive receptors would exceed 60 dBA Ldn. Although levels at these boundaries may exceed the compatibility standards of the General Plan, all sensitive receptors located within the 60 dBA Ldn distance buffer experience predicted existing and future traffic noise levels in excess of 70 dBA CNEL. Thus, impacts specifically from rail noise would be less than significant, and no mitigation is required.</p>	<p><i>Discretionary</i></p> <p>None Required.</p> <p><i>Ministerial</i></p> <p>Mitigation Measure NOISE 5.5-1, as described in Section 5.5, Noise.</p> <p><u>Rail Noise</u></p> <p>Mitigation Measure NOISE 5.5-1, as described in Section 5.5, Noise, was identified to reduce significant exterior noise impacts associated with ministerial projects. However, as discussed in Section 5.5 of this PEIR, NOISE 5.5-1 is not feasible as there is no procedure to ensure that exterior noise is adequately attenuated. While future discretionary projects have a framework in place that would ensure exterior noise levels are appropriately attenuated to meet the General Plan Compatibility Standards, there is no similar mechanism in place for ministerial projects.</p> <p><u>Rail Noise</u></p> <p>None Required</p>	<p><u>Noise</u></p> <p><i>Discretionary</i></p> <p>Less than Significant</p> <p><i>Ministerial</i></p> <p>Significant and Unavoidable</p> <p><u>Rail Noise</u></p> <p>Less than Significant</p>
<p>Would the project result in land uses which are not compatible with aircraft noise levels as defined by an adopted Airport</p>	<p>Based on the projected airport noise contours for SDIA, no portions of the proposed Old Town CPU area are forecasted to experience noise levels due to aircraft operations that exceed 60 dBA CNEL; therefore, impacts related to airport noise would be less than</p>	<p>None Required</p>	<p>Less than Significant</p>

**Table S-1
Summary of Significant Environmental Impacts**

Environmental Issue	Results of Impact Analysis	Mitigation	Impact Level After Mitigation
Land Use Compatibility Plan (ALUCP)?	significant. No mitigation is required.		
Would the project result in the exposure of people to noise levels which exceed property line limits established in the Noise Abatement and Control Ordinance of the Municipal Code?	Mixed-use sites and areas where residential uses are located in proximity to commercial sites would expose sensitive receptors to noise. Although noise-sensitive residential land uses would be exposed to noise associated with the operation of these commercial uses, City policies and regulations would control noise and reduce noise impacts between various land uses. In addition, enforcement of the state noise regulations in Title 24 of the California Code of Regulations would control impacts. With implementation of these policies and enforcement of the Noise Abatement and Control Ordinance of the SDMC, impacts would be less than significant. No mitigation is required at the program level.	None Required	Less than Significant
Would the project result in the exposure of people to significant temporary construction noise?	<p><u>Construction Noise</u></p> <p>Construction activities related to implementation of the project would potentially generate short-term noise levels in excess of 75 dBA Leq at adjacent properties. While the City regulates noise associated with construction equipment and activities through enforcement of noise ordinance standards (e.g., days of the week and hours of operation) and imposition of conditions of approval for building or grading permits, there is a procedure in place that allows for a variance to the noise ordinance. Due to the developed nature of the proposed CPU area with sensitive receivers potentially located in close proximity to any given construction site, there is a potential for construction of future projects to expose existing sensitive land uses to significant noise levels. While future development projects would be required to incorporate feasible mitigation measures, due to the proximity of sensitive receivers to potential construction sites, the program-level impact related to construction noise would be potentially significant (<i>Impact 5.5-2</i>).</p> <p><u>Vibration – Construction</u></p> <p>By use of administrative controls, such as scheduling construction activities with the highest potential to produce perceptible vibration to hours with least potential to affect nearby properties, perceptible vibration can be kept to a minimum and, as such, would result in a less than significant impact with respect to perception. However, due to the developed nature of the proposed CPU area with existing</p>	<p><u>Construction Noise</u></p> <p>Mitigation Measure NOISE 5.5-2 as described in Section 5.5, Noise.</p> <p><u>Vibration – Construction</u></p> <p>Mitigation Measure NOISE 5.5-3 as described in Section 5.5, Noise.</p> <p><u>Vibration – Operation</u></p> <p>None Required</p>	<p><u>Construction Noise</u></p> <p>Less than Significant with Mitigation</p> <p><u>Vibration – Construction</u></p> <p>Significant and Unavoidable</p> <p><u>Vibration – Operation</u></p> <p>Less than Significant</p>

Table S-1 Summary of Significant Environmental Impacts			
Environmental Issue	Results of Impact Analysis	Mitigation	Impact Level After Mitigation
	<p>structures occupying the majority of parcels, pile driving within distances of existing structures listed in Table 5.5-7 has the potential to exceed damage thresholds and would be potentially significant (<i>Impact 5.5-3</i>).</p> <p><u>Vibration – Operation</u></p> <p>Post-construction operational vibration impacts could occur as a result of commercial operations that are implemented in accordance with the project. The commercial uses that would be constructed under the project would include uses such as retail, restaurants, and small offices that would not require heavy mechanical equipment that would generate groundborne vibration or heavy truck deliveries. Residential and civic uses do not typically generate vibration. Thus, operational vibration impacts associated with the project would be less than significant. No mitigation is required.</p>		
Health and Safety			
<p>Would the project expose people or structures to a significant risk of loss, injury, or death involving wildland fires, including when wildlands are adjacent to urbanized areas or where residences are intermixed with wildlands?</p>	<p>Existing policies and regulations would help reduce, but not completely abate, the potential risks of wildland fires. The General Plan contains goals and policies to be implemented by the City's Fire-Rescue Department, and through land use compatibility, training, sustainable development, and other measures, these goals and policies are aimed at reducing the risk of wildland fires. Continued monitoring and updating of existing development regulations and plans also would assist in creating defensible spaces and reduce the threat of wildfires. Public education, firefighter training, and emergency operations efforts would reduce the potential impacts associated with wildfire hazards. Additionally, future development would be subject to conditions of approval that require adherence to the City's Brush Management Regulations and requirements of the California Fire Code. As such, impacts relative to wildland fire hazard would be less than significant. No mitigation is required.</p>	None Required	Less than Significant
<p>Would the project result in hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within a quarter-mile of an existing</p>	<p>The project would not result in hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within a quarter-mile of any existing or proposed school. Impacts to schools would be less than significant. No mitigation is required.</p>	None Required	Less than Significant

**Table S-1
Summary of Significant Environmental Impacts**

Environmental Issue	Results of Impact Analysis	Mitigation	Impact Level After Mitigation
or proposed school?			
Would the project impair implementation of, or physically interfere with an adopted emergency response plan or emergency evacuation plan?	The project would not impair implementation of, or physically interfere with, an adopted emergency response plan or emergency evacuation plan. Therefore, impacts would be less than significant, and no mitigation is required.	None Required	Less than Significant
Would the project be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, create a significant hazard to the public or environment?	Although there are closed leaking underground storage tank and Cleanup Program sites and two open Cleanup Program sites within the Old Town community, there are federal, state, and local regulations and programs in place that minimize the risk to sensitive receptors on or adjacent to hazardous materials sites and for hazardous materials release sites that may be encountered in the future. Adherence to these regulations would result in less than significant impacts relative to hazardous materials sites, and no mitigation is required.	None Required	Less than Significant
Would the project expose people or structures to a significant risk of loss, injury, or death from off-airport aircraft operational accidents?	Impacts from safety hazards related to location within an AIA would be less than significant. No mitigation is required.	None Required	Less than Significant
Hydrology and Water Quality			
Would the project result in flooding due to an increase in impervious surfaces, changes in absorption rates, drainage patterns, or the rate of surface runoff?	All development is subject to drainage and floodplain regulations in the SDMC and would be required to adhere to the City's Drainage Design Manual and Storm Water Standards Manual. Therefore, with future development, the volume and rate of overall surface runoff within the proposed CPU area would be reduced when compared to the existing condition. Impacts would be less than significant, and mitigation is not required.	None Required	Less than Significant
Would the project result in a substantial increase in pollutant discharge to receiving waters and increase discharge of identified pollutants to an already impaired water body?	New development under the project would be required to implement low impact development (LID) and storm water BMPs into project design to address the potential for transport of pollutants of concern through either retention or filtration. The implementation of LID design and storm water BMPs would reduce the amount of pollutants transported from the proposed Old Town CPU area to receiving waters. Impacts would be less than significant, and no	None Required	Less than Significant

Table S-1 Summary of Significant Environmental Impacts			
Environmental Issue	Results of Impact Analysis	Mitigation	Impact Level After Mitigation
	<p>mitigation is required.</p> <p>Future development would adhere to the requirements of the MS4 permit for the San Diego Region and the City's Storm Water Standards Manual; therefore, no <u>substantial</u> pollutant discharges would occur and there would be no substantial adverse effect on water quality <u>would result</u>. Additionally, the City has adopted the Master Storm Water Maintenance Program to address flood control issues by cleaning and maintaining the channels to reduce the volume of pollutants that enter the receiving waters. The existing Master Storm Water System Maintenance Program will be replaced by a new <u>Municipal Waterways Maintenance Plan</u> which is currently undergoing environmental review. Impacts would be less than significant, and no mitigation is required.</p>		
<p>Would the project deplete groundwater supplies, degrade groundwater quality, or interfere with groundwater recharge?</p>	<p>Groundwater within the San Diego Mesa is exempt from municipal and domestic supply beneficial use and does not support municipal and domestic supply. Groundwater within the Mission San Diego subarea of the Lower San Diego area of the San Diego Hydrologic Unit has a potential beneficial use for municipal and domestic supply. Storm water regulations that encourage infiltration of storm water runoff and protection of water quality would also protect the quality of groundwater resources and support infiltration where appropriate. Thus, implementation of the project would result in a less than significant impact on groundwater supply and quality. No mitigation is required.</p>	None Required	Less than Significant
<p>Visual Effects and Neighborhood Character</p>			
<p>Would the project result in a substantial obstruction of a vista or scenic view from a public viewing area as identified in the community plan?</p>	<p>Implementation of the project would not result in substantial alteration or blockage of public views from critical view corridors, designated open space areas, public roads, or public parks; new development within the community would take place within the constraints of the existing urban framework and development pattern, thereby not impacting public view corridors and viewsheds along public rights-of-way. Therefore, public view impacts would be less than significant, and no mitigation is required.</p> <p>No Officially Designated State Scenic Highways occur in the vicinity of the proposed CPU area. Impacts would be less than significant, and no mitigation is required.</p>	None Required	Less than Significant

**Table S-1
Summary of Significant Environmental Impacts**

Environmental Issue	Results of Impact Analysis	Mitigation	Impact Level After Mitigation
Would the project result in a substantial alteration (e.g., bulk, scale materials or style) to the existing or planned (adopted) character of the area?	The proposed Old Town CPU includes policies that would encourage residential, commercial, and mixed-use development that would be consistent with the existing neighborhood character, and impacts would be less than significant. No mitigation is required.	None Required	Less than Significant
Would the project result in the loss of any distinctive or landmark tree(s), or stand of mature trees as identified in the community plan? (Normally, the removal of non-native trees within a wetland as part of a restoration project would not be considered significant.)	Implementation of the proposed Old Town CPU would prevent the loss of existing mature trees except as required because of tree health or public safety. The implementation of the project would not result in the loss of any distinctive or landmark trees, or any stand of mature trees; therefore, no impacts would result. No mitigation is required.	None Required	No Impact
Would the project result in a substantial change in the existing landform?	Implementation of the project would result in less than significant impacts related to landform alteration based on implementation of proposed Old Town CPU policies that require building form to be sensitive to topography and slopes, and existing protections for steep slopes (ESL) and grading regulations within the Land Development Code (LDC). Thus, impacts related to landform alteration would be less than significant, and no mitigation is required.	None Required	Less than Significant
Would the project create substantial light or glare which would adversely affect daytime or nighttime views in the area?	Impacts relative to lighting and glare would be less than significant through the implementation of existing requirements as well as policies in the proposed CPU. No mitigation is required.	None Required	Less than Significant
Air Quality			
Would the project conflict with or obstruct implementation of the applicable air quality plan?	The net increase in construction and operational emissions under the project over the adopted Community Plan would not result in the generation of criteria air pollutants that would exceed any of the thresholds. Thus, emissions associated with the project are already accounted for in the Regional Air Quality Strategy (RAQS), and adoption of the project would not conflict with the RAQS. Thus, impacts related to conflicts with applicable air quality plans would be less than significant, and no mitigation is required.	None Required	Less than Significant

**Table S-1
Summary of Significant Environmental Impacts**

Environmental Issue	Results of Impact Analysis	Mitigation	Impact Level After Mitigation
Would the project result in a violation of any air quality standard or contribute substantially to an existing or projected air quality violation?	<p>Regarding construction emissions, based on the worst case construction emission analysis with an intensive year of construction discussed previously, air emissions associated with build-out of individual projects under the project would not exceed any of the significance thresholds. Thus, construction emissions would be less than significant, and no mitigation is required.</p> <p>Regarding operational emissions, the net increase in emissions compared to the existing Community Plan would not exceed the applicable thresholds of significance. Therefore, air emissions from build-out of the project would not significantly increase air pollutants in the region, would not further increase the frequency of existing violations of National Ambient Air Quality Standards (NAAQS) or California Ambient Air Quality Standards (CAAQS), or would not result in new exceedances. Therefore, operational air quality impacts associated with the implementation of the project would be less than significant. Thus, no mitigation is required.</p>	None Required	Less than Significant
Would the project expose sensitive receptors to substantial pollutant concentrations?	Regarding impacts to sensitive receptors, implementation of the project would not result in any carbon monoxide (CO) hotspots. The proposed Old Town CPU contains policies related to siting of land uses and air quality, and implementation of the proposed Old Town CPU is consistent with the goals of the California Air Resources Board (CARB) handbook. Thus, air quality impacts to sensitive receptors would be less than significant, and no mitigation is required.	None Required	Less than Significant
Would the project create objectionable odors affecting a substantial number of people?	The project does not propose land uses associated with generation of adverse odors. Further, San Diego Air Pollution Control District (APCD) rules prohibit the emission of any material which causes a nuisance to a considerable number of persons or endangers the comfort, health, or safety of the public. Therefore, impacts would be less than significant, and no mitigation is required.	None Required	Less than Significant
Greenhouse Gas Emissions			
Would the project generate greenhouse gas emissions (GHG), either directly or indirectly, that may have a significant impact on the environment?	Potential impacts related to GHG emissions from implementation of the project would be less than significant; the project would result in a decrease in GHG emissions when compared with land uses currently approved. The proposed CPU is also consistent with the City of Villages strategy and the Climate Action Plan (CAP). Thus, the project would result in a less than significant impact related to	None Required	Less than Significant

Table S-1 Summary of Significant Environmental Impacts			
Environmental Issue	Results of Impact Analysis	Mitigation	Impact Level After Mitigation
	GHG emissions. No mitigation is required.		
Would the project conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing emissions of greenhouse gases?	<p>The project is consistent with the adopted CAP and contains goals and objectives that implement all of the five primary CAP strategies. The project would be consistent with each of the CAP strategies by:</p> <ul style="list-style-type: none"> • Supporting future growth near the Old Town Transit Center to promote continued transit use; • Enhancing the pedestrian and bicycle network; • Improving roadway and parking efficiency, congestion, and install roundabouts where needed to reduce vehicle fuel consumption. • Encouraging development that incorporates renewable energy; • Supporting waste reduction, recovery, and recycling; • Encouraging sustainable building methods, materials and features; and • Increasing the tree canopy. <p>Therefore, the project would not conflict with the City's CAP or any other applicable plan, policy, or regulation adopted for the purpose of reducing emissions of greenhouse gases impacts, and impacts would be less than significant. No mitigation is required.</p>	None Required	Less than Significant
Public Services and Facilities			
Would the project promote growth patterns resulting in the need for and/or provision of new or physically altered public facilities (including police protection, parks or other recreational facilities, fire/life safety protection, libraries, or schools, the construction of which could cause significant environmental impacts in order to maintain service ratios, response times, or other performance objectives?	<p><u>Police Protection</u></p> <p>Regarding police protection, implementation of the project would result in an increase in overall population. However, the proposed increase in population would not require that San Diego Police Department expand or construct new facilities. Therefore, impacts related to the expansion/construction of new facilities would be less than significant, and no mitigation is required.</p> <p><u>Parks and Recreation</u></p> <p>Regarding park and recreational facilities, there is an existing deficit for an aquatic complex, which is an adverse impact but not considered a significant physical impact. Implementation of the project would provide policy support for expansions and improvements to the community's population-based parks and construction of the proposed shared aquatic complexes in</p>	None Required	Less than Significant

**Table S-1
Summary of Significant Environmental Impacts**

Environmental Issue	Results of Impact Analysis	Mitigation	Impact Level After Mitigation
	<p>neighboring communities, but do not propose design and construction of new parks and recreation facilities. Thus, implementation of the project would result in a less than significant impact related to parks and recreation, and no mitigation is required.</p> <p><u>Fire/Life Safety Protection</u></p> <p>Regarding fire/life safety protection, implementation of the project would result in an increase in overall population. No additional fire stations are planned within the Old Town community, but Fire Stations 8 and 20 located within Uptown and Midway-Pacific Highway, respectively, have plans for expansion and eventual new replacement facilities to meet current and future operational needs. In addition, Fire Station 15 located in Ocean Beach also has plans for expansion and an eventual new replacement facility. However, the expected increase in population would not require that the Fire-Rescue Department expand or construct new facilities. Therefore, impacts related to the expansion/construction of new facilities would be less than significant, and no mitigation is required.</p> <p><u>Libraries</u></p> <p>Since the project does not include the construction of library facilities and facility needs would be met within the proposed CPU area, impacts related to library facilities would be less than significant, and no mitigation is required.</p> <p><u>Schools</u></p> <p>Regarding school facilities, future residential development that occurs in accordance with the project would be required to pay school fees as outlined in Government Code Section 65995, Education Code Section 53080, and Senate Bill (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. Therefore, impacts to schools would be less than significant, and no mitigation is required.</p>		

Table S-1 Summary of Significant Environmental Impacts			
Environmental Issue	Results of Impact Analysis	Mitigation	Impact Level After Mitigation
Public Utilities			
Would the project use excessive amounts of water beyond projected available supplies?	Based on the findings of the Water Supply Assessment, there is sufficient water supply to serve existing and projected demands of the project, and future water demands within the Public Utilities Department (PUD) service area in normal and dry year forecasts during a 20-year projection. Therefore, no significant impacts to water supply are anticipated for the implementation of the project. No mitigation is required. For impacts related to Water Facilities, see the threshold below.	None Required	Less than Significant
Would the project promote growth patterns resulting in the need for and/or provision of new or physically altered utilities, the construction of which could cause significant environmental impacts in order to maintain service ratios, or other performance objectives?	<p><u>Storm Water</u></p> <p>With implementation of the project, there is an increase in overall population, which could result in a need for <u>Future projects would be an increase in overall population, which could result in a need for</u> required to exercise strict adherence to existing storm water regulations and conformance with General Plan and proposed CPU policies. Project-specific review under the Municipal Storm Water Permit would assure that significant adverse effects related to the storm water system and the installation of new storm water infrastructure. However, no storm drains, or other community-wide drainage facilities, would be avoided. In addition, the proposed CPU does not identify any specific storm water infrastructure improvements that are required or proposed for construction in conjunction with implementation of the project, and the location and extent of future facilities is not known at this time; therefore, no impacts can be identified. <u>required to exercise strict adherence to existing storm water regulations and conformance with General Plan and proposed CPU policies. Project-specific review under the Municipal Storm Water Permit would assure that significant adverse effects related to the storm water system and the installation of new storm water infrastructure. However, no storm drains, or other community-wide drainage facilities, would be avoided. In addition, the proposed CPU does not identify any specific storm water infrastructure improvements that are required or proposed for construction in conjunction with implementation of the project, and the location and extent of future facilities is not known at this time; therefore, no impacts can be identified.</u> Thus, impacts associated with storm water facilities as a result of the project would be less than significant. No mitigation is required.</p> <p><u>Sewer</u></p> <p>Sewer line upgrades are administered by the Public Works Department (PWD) and are handled on a project-by-project basis. Because future development under the project would likely increase demand, there may be a need to increase sizing of existing pipelines and sewer mains. However, the proposed CPU does not identify any specific sewer infrastructure improvements that are required or proposed in conjunction with the project, and the location and extent of future facilities is not known at this time; therefore, no impacts can be identified. The project does not propose any specific development but provides the framework for future growth. No new <u>Because future development under the project would likely increase demand, there may be a need to increase sizing of existing pipelines and sewer mains. However, the proposed CPU does not identify any specific sewer infrastructure improvements that are required or proposed in conjunction with the project, and the location and extent of future facilities is not known at this time; therefore, no impacts can be identified.</u></p>	None Required	Less than Significant

**Table S-1
Summary of Significant Environmental Impacts**

Environmental Issue	Results of Impact Analysis	Mitigation	Impact Level After Mitigation
	<p>sewer collection or wastewater treatment facilities are proposed in conjunction with the project. Thus, impacts associated with sewer facilities as a result of the project would be less than significant. No mitigation is required.</p> <p><u>Water Facilities</u></p> <p><u>As future development takes place in the proposed CPU area, demand for water is likely to increase and create a potential need to increase sizing of existing pipelines, mains, and treatment facilities. However, the proposed CPU does not identify any specific water infrastructure improvements that are required or proposed in conjunction with the project, and the location and extent of future facilities is not known at this time; therefore, no impacts can be identified. No new water distribution or treatment facilities are proposed in conjunction with the project.</u> Thus, impacts associated with <u>water facilities distribution and treatment facilities</u> as a result of the project would be less than significant. No mitigation is required.</p> <p><u>Communications</u></p> <p><u>As future development takes place in the proposed CPU area, demand for communications systems is likely to increase and create a potential need for expansion of facilities. However, the proposed CPU does not identify any specific communications systems infrastructure improvements that are required or proposed in conjunction with the project, and the location and extent of future facilities is not known at this time; therefore, no impacts can be identified. No specific communications systems upgrades are proposed with this project.</u> Therefore, <u>no impacts will occur to communication systems</u> would be less than significant, and no mitigation is required.</p>		
<p>Would the project result in impacts to solid waste management, including the need for construction of new solid waste infrastructure; or result in a land use plan that would not promote the achievement of a 75 percent waste diversion as targeted in AB</p>	<p>To ensure that waste generation and recycling efforts during construction and post-construction future land use occupancy and operation (i.e., residential, commercial, industrial, mixed-use, etc.) are addressed, a Water Management Plan (WMP) shall be prepared for any future development of 40,000 square feet or more proposed under the project that may generate 60 tons of waste or more during construction and/or operation. Implementation of these WMPs would ensure that future development project impacts would be less than</p>	<p>None Required</p>	<p>Less than Significant</p>

<p align="center">Table S-1 Summary of Significant Environmental Impacts</p>			
Environmental Issue	Results of Impact Analysis	Mitigation	Impact Level After Mitigation
341 and the City's Climate Action Plan?	significant. Ministerial projects, and discretionary projects that would fall below the 60 ton threshold, would be required to comply with the SDMC sections addressing construction and demolition debris, waste and recyclable materials storage, and recyclable materials (and in the future, organic materials) collection. Therefore, at this program level of review, the project would not require increased landfill capacity, and impacts associated with solid waste would be less than significant. No mitigation is required.		
Biological Resources			
Would the project result in a substantial adverse impact, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in the MSCP or other local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife (CDFW) or U.S. Fish and Wildlife Service (USFWS)?	Implementation of the project would result in land use changes that would affect primarily developed areas; therefore, impacts to sensitive species are not anticipated. If potential impacts are identified, the regulatory framework in place per local, state and federal law would be evoked as applicable with future project specific development proposals. Impacts to wildlife species would therefore not occur, and no mitigation is required.	None Required	Less than Significant
Would the project result in a substantial adverse impact on any Tier I Habitats, Tier II Habitats, Tier IIIA Habitats, or Tier IIIB Habitats, as identified in the Biology Guidelines of the Land Development manual, or other sensitive natural community identified in local or regional plans, policies, regulations, or by the CDFW or USFWS?	Implementation of the project would result in land use changes that would affect primarily developed areas; therefore, impacts to sensitive habitats are not anticipated. If potential impacts are identified, the regulatory framework in place per local, state and federal law would be evoked as applicable with future project specific development proposals. Impacts to sensitive habitats or species would be less than significant, and no mitigation is required.	None Required	Less than Significant
Would the project result in a substantial adverse impact on wetlands (including, but not limited to, marsh, vernal pool, riparian, etc.) through direct removal, filling, hydrological interruption, or other means?	Implementation of the project would not result in impacts to wetlands (riparian scrub), as areas where this habitat occurs are outside of the proposed CPU area. No impacts to wetlands are expected; therefore, impacts would be less than significant, and no mitigation is required.	None Required	Less than Significant

Table S-1 Summary of Significant Environmental Impacts			
Environmental Issue	Results of Impact Analysis	Mitigation	Impact Level After Mitigation
Would the project interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, including linkages identified in the MSCP Plan, or impede the use of native wildlife nursery sites?	The proposed CPU area does not include wildlife corridors; thus, no impact to wildlife corridors would occur. In addition, wildlife corridors adjacent to the proposed CPU area would not be impacted, Therefore, impacts would be less than significant, and no mitigation is required.	None Required	Less than Significant
Would the project result in a conflict with the provisions of an adopted Habitat Conservation Plan, Natural Conservation Community Plan, or other approved local, regional, or State habitat conservation plan, either within the MSCP plan area or in the surrounding region?	The project would be carried out consistent with the City's MSCP Sub-area Plan, including Section 1.4.3 MHPA Land Use Adjacency Guidelines and SDMC/LDC regulations including Section 142.0740) requirements relative to lighting adjacent to the MHPA. Additionally, in complying with the MHPA Land Use Adjacency Guidelines requirements, discretionary and ministerial site plans (including landscape plans) for future projects would require that; grading would not impact environmentally sensitive land, potential runoff would not drain into MHPA land, toxic materials used on a development would not impact adjacent sensitive land, development includes appropriate barriers/signage that would reduce noise impacts, predation by domestic animals and human encroachment would not occur, and landscaping does not contain potentially invasive species. In addition, the MHPA Land Use Adjacency Guidelines directs development so that any brush management activities are minimized within the MHPA, and contains requirements to reduce potential noise impacts to listed avian species. Compliance with the City's MHPA Land Use Adjacency Guidelines, permit conditions for bird surveys, and adherence to the policies in the Conservation Element of the proposed CPU would reduce potential impacts of the project to less than significant.	None Required	Less than Significant
Paleontological Resources			
Would the project result in development that requires over 1,000 cubic yards of excavation in a high resource potential geologic deposit/formation/rock unit or over 2,000 cubic yards of excavation in a moderate resource potential geologic deposit/formation/rock	The proposed Old Town CPU area is underlain by the Bay Point, San Diego, and Scripps formations, which are all assigned a high paleontological resource sensitivity, and the Lindavista Formation which is assigned a moderate paleontological resources sensitivity. Because of high sensitivity for paleontological resources within the Bay Point, San Diego, and Scripps formations and moderate sensitivity for paleontological resources within the Lindavista Formation, grading into these formations could potentially destroy	Mitigation Measure PALEO 5.14-1 as described in Section 5.14, Paleontological Resources.	<u>Discretionary Projects</u> Less than Significant with Mitigation <u>Ministerial</u>

**Table S-1
Summary of Significant Environmental Impacts**

Environmental Issue	Results of Impact Analysis	Mitigation	Impact Level After Mitigation
unit?	fossil resources. Therefore, implementation of future discretionary and ministerial projects within the proposed CPU area within these formations has the potential to result in significant impacts to paleontological resources.		<u>Projects</u> Significant and Unavoidable



Chapter 1.0

Introduction

This ~~draft~~^{final} Program Environmental Impact Report (PEIR) for the proposed Old Town San Diego Community Plan Update (proposed CPU; proposed Old Town CPU) and other associated discretionary actions (collectively referred to throughout this PEIR as the “project”) has been prepared on behalf of the City of San Diego (City) in compliance with the California Environmental Quality Act (CEQA) Statute and Guidelines (Public Resources Code, Section 21000 et seq. and California Code of Regulations (CCR), Title 14, Section 15000, et seq.) and in accordance with the City’s Environmental Impact Report Guidelines (EIR Guidelines; City of San Diego 2005) and the City’s California Environmental Quality Act Significance Determination Thresholds (Significance Determination Thresholds) (2016).

The project analyzed within this PEIR includes legislative actions to be considered by the City Council, but primarily is a comprehensive update of the 1987 Old Town San Diego Community Plan and the Old Town San Diego Planned District Ordinance (PDO). The proposed CPU reflects Citywide policies and programs developed in the General Plan Update of 2008 (General Plan) and is consistent with the General Plan. The proposed CPU contains nine elements, as well as an Introduction and Implementation section. The elements are as follows: Historic Preservation; Land Use; Mobility; Urban Design; Economic Prosperity; Public Facilities, Services and Safety; Recreation; Conservation; and Noise.

The proposed CPU contains a specific vision embodied in its guiding principles, as well as key goals. The proposed CPU also contains development design guidelines, as well as policies and recommendations related to a range of topics included in each section such as multimodal mobility, urban design, environmental conservation, recreation opportunities, neighborhood character, and historic preservation, in accordance with the general goals stated in the General Plan. The proposed CPU serves as the basis for guiding a variety of other future implementing actions, such as park improvements and multi-modal mobility improvements.

1.1 PEIR Purpose and Intended Uses

In accordance with CEQA Guidelines Section 15121, the purpose of this PEIR is to provide public agency decision-makers and members of the public with detailed information about the potential significant

environmental effects of the project, possible ways to minimize its significant effects, and reasonable alternatives that would reduce or avoid any identified significant effects. This PEIR is informational in nature and is intended for use by decision-makers, Responsible or Trustee Agencies as defined under CEQA, other interested agencies or jurisdictions, and the general public. The PEIR includes recommended mitigation measures which, when implemented, would lessen project impacts and provide the City, the lead agency as defined in Article 4 of the CEQA Guidelines (Sections 15050 through 15051), with ways to substantially lessen or avoid significant effects of the project on the environment, whenever feasible. Alternatives to the proposed CPU are presented to evaluate alternative land use scenarios, policies, and/or regulations that would further reduce or avoid significant impacts associated with the project.

In accordance with CEQA Guidelines Section 15168, a PEIR may serve as the Environmental Impact Report (EIR) for subsequent activities or implementing actions, including future development of public and private projects, to the extent it contemplates and adequately analyzes the potential environmental impacts of those subsequent projects. If, in examining future actions for development within the proposed CPU area, the City finds no new effects could occur, or no new mitigation measures would be required other than those analyzed and/or required in the PEIR, the City can approve the activity as being within the scope covered by this PEIR, and no new environmental documentation would be required. If additional analysis is required, it can be streamlined by tiering from this PEIR pursuant to CEQA Guidelines Sections 15152, 15153, and 15168 (e.g., through preparation of a Mitigated Negative Declaration, Addendum, or EIR).

1.2 PEIR Legal Authority

1.2.1 Lead Agency

The City of San Diego is the lead agency for the project pursuant to Article 4 (Sections 15050 and 15051) of the CEQA Guidelines. The lead agency, as defined by CEQA Guidelines Section 15367, is the public agency which has the principal responsibility and authority for carrying out or approving a project. On behalf of the lead agency, the City's Planning Department conducted a preliminary review of the project and decided that an EIR was required. The analysis and findings in this document reflect the independent, impartial conclusions of the City.

1.2.2 Responsible and Trustee Agencies

State law requires that all EIRs be reviewed by Responsible and Trustee Agencies. A Responsible Agency, defined pursuant to CEQA Guidelines Section 15381, includes all public agencies other than the lead agency that have discretionary approval power over the project. A Trustee Agency is defined in Section 15386 of the CEQA Guidelines as a state agency having jurisdiction by law over natural resources affected by a project that are held in trust for the people of the state of California. Implementation of the project would require subsequent actions or consultation from Responsible or Trustee Agencies. A brief description of some of the primary Responsible or Trustee Agencies that may have an interest in the project is provided below.

1.2.2.1 U.S. Army Corps of Engineers

The U.S. Army Corps of Engineers (USACE) has jurisdiction over development in or affecting the navigable waters of the United States. All permits issued by the USACE are subject to consultation and/or review by the U.S. Fish and Wildlife Service (USFWS) and the U.S. Environmental Protection Agency (EPA). Drainages occurring within the proposed CPU area may contain streams and wetlands, which may be classified as jurisdictional waters of the United States. No permits from USACE are required at this time; however, future development projects, particularly improvements to infrastructure such as water and sewer lines that could occur with implementation of the project, may require review and/or USACE permits in the future.

1.2.2.2 California Department of Transportation

The proposed CPU area is adjacent to California Department of Transportation (Caltrans) facilities, including Interstate 5 (I-5) and Interstate 8 (I-8). No permits from Caltrans are required at this time; however, Caltrans approval would be required for any encroachments or construction of facilities in a Caltrans right-of-way associated with future projects within the proposed CPU area.

1.2.2.3 California Department of Fish and Wildlife

An Agreement Regarding Proposed Stream or Lake Alteration (Streambed Alteration Agreement) with an agency or private party proposing to alter the bed, banks, or floor of any watercourse/stream, is under the authority of the California Department of Fish and Wildlife (CDFW) pursuant to Section 1600 et seq. of the California Fish and Game Code. The purpose of code Sections 1600-1616 is to protect and conserve fish and wildlife resources that could be substantially adversely affected by a substantial diversion or obstruction of natural flow of, or substantial change or use of material from the bed, bank, or channel of, any river, stream, or lake. Drainages occurring within the proposed CPU area may contain streams and wetlands. No permits from CDFW are required at this time; however, development projects, particularly improvements to infrastructure such as water and sewer lines that could occur with implementation of the project, may require review and/or Streambed Alteration Agreements in the future.

1.2.2.4 San Diego Regional Water Quality Control Board

The San Diego Regional Water Quality Control Board (RWQCB) regulates water quality through the Federal Clean Water Act Section 401 certification process and oversees the National Pollutant Discharge Elimination System (NPDES) Permit No. CAS0109266. The RWQCB is responsible for implementing permitting, compliance, and other activities to reduce pollutants in municipal, construction, and industrial storm water runoff, including overseeing the development and implementation of Water Quality Improvement Plans (WQIPs) as required by the Regional Municipal Separate Storm Sewer System (MS4) Permit for the San Diego region, which includes the City, as well as ensuring that all other MS4 permit requirements are met. No permits from the RWQCB are required at this time; however, future development projects within the proposed CPU area may require review and/or Section 401 certifications.

1.2.2.5 San Diego County Regional Airport Authority

The San Diego County Regional Airport Authority (Airport Authority) operates the San Diego International Airport (SDIA). The Airport Authority also serves as San Diego County's Airport Land Use Commission (ALUC) and is responsible for land use planning as it relates to public safety surrounding the region's airports. As a Responsible Agency, the Airport Authority, acting as the ALUC, would review future development proposals within the proposed CPU area and make "consistency determinations" with the provisions and policies set forth in the SDIA Airport Land Use Compatibility Plan (ALUCP) up until the time the ALUC determines the proposed CPU and zoning consistent with the ALUCP for SDIA. Future development projects within the proposed CPU area would be subject to the overflight and airspace protection policies in the ALUCP for SDIA, which also include the Code of Federal Regulations (CFR), Part 77 requirement to provide notification to Federal Aviation Administration (FAA) as addressed in the ALUCP for SDIA.

1.3 EIR Type, Scope and Content, and Format

1.3.1 Type of EIR

This EIR has been prepared as a Program EIR (PEIR), as defined in Section 15168 of the CEQA Guidelines. In accordance with CEQA, this PEIR examines the environmental impacts of the proposed CPU, which comprise of a series of actions. The combined actions can be characterized as one large project for the purpose of environmental review in this PEIR and are herein collectively referred to as the "project." The PEIR focuses on the physical changes in the environment that would result from adoption and implementation of the project described in Chapter 3.0, Project Description, including anticipated general impacts that could result during future construction and operation.

1.3.2 PEIR Scope and Content

The scope of analysis for this PEIR was determined by the City as a result of initial project review, as well as consideration of comments received in response to the Notice of Preparation (NOP) circulated November 4, 2015, and a scoping meeting held on November 20, 2015, at the Caltrans District 11 Office, Garcia Auditorium, 4050 Taylor Street, San Diego, California 92110. The NOP for analysis of the project, related letters received, and comments made during the scoping meeting are included as Appendix A of this PEIR. Through these scoping activities, the project was determined to have the potential to result in significant environmental impacts to the following subject areas:

- Land Use
- Transportation and Circulation
- Historical and Tribal Cultural Resources
- Geologic Conditions
- Noise
- Health and Safety
- Hydrology/Water Quality
- Visual Effects and Neighborhood Character
- Air Quality
- Greenhouse Gas Emissions
- Public Services and Facilities
- Public Utilities
- Biological Resources
- Paleontological Resources

It should be noted that the NOP for the PEIR included the project as well as the proposed CPU for the Midway-Pacific Highway community plan area. The environmental analysis for the Midway-Pacific Highway CPU has been separated from the analysis of the proposed Old Town CPU. The Midway-Pacific Highway CPU is analyzed in a separate PEIR, which will be circulated for public review separately. The State Clearinghouse number assigned with issuance of the NOP (SCH # 2015111013) is being used for the Midway-Pacific Highway CPU PEIR, and a new State Clearinghouse number will be assigned for the proposed Old Town CPU PEIR at the start of public review. Please note that some of the technical reports cover both the Midway-Pacific Highway CPU and the Old Town CPU: the Transportation Impact Study (Appendix B), the Mobility Report (Appendix C), the Seismic and Geologic Technical Background Report (Appendix F), the Hazardous Materials Technical Study (Appendix J), and the Paleontological Resource Assessment (Appendix M).

The intent of this PEIR is to determine whether implementation of the project would have a significant effect on the environment through analysis of each issue identified during the scoping process. The Environmental Analysis for the project is presented in the Environmental Analysis section in this PEIR (Sections 5.1 through 5.14). Each environmental issue area presented in this chapter includes presentation of threshold(s) of significance for the particular issue area under evaluation based on the CEQA Guidelines and the City's Significance Determination Thresholds (2016); identification of an issue statement; an assessment of any impacts including cumulative impacts; a summary of any project impacts; and recommendations for mitigation measures and mitigation monitoring and reporting, as appropriate, for each significant issue area.

Pursuant to CEQA Guidelines Section 15126, all phases, or in the case of this project, discretionary actions associated with the proposed CPUs are considered at the program level in this PEIR when evaluating potential impacts on the environment, including the construction of future development and supporting facilities and infrastructure. Impacts are identified as direct or indirect, short-term or long-term, and are assessed on a plan-to-ground basis. The plan-to-ground analysis addresses the changes or impacts that would result from implementation of the project compared to existing ground conditions. In some cases, the proposed CPU is also compared with the current Community Plan to provide context and background for the analysis.

The PEIR includes all mandatory contents of EIRs as required pursuant to CEQA Guidelines Sections 15120 through 15132. A Cumulative Impacts analysis is presented within each specific environmental issue area of Chapter 6.0. Chapter 7.0, Other Mandatory Discussion Areas, presents a brief discussion of potential growth-inducing impacts, environmental effects that were evaluated as part of the initial scoping and review process for the project and were found not to be potentially significant, and unavoidable significant environmental impacts and significant irreversible environmental changes.

Chapter 8.0 of this PEIR includes a discussion of Alternatives that could avoid or reduce potentially significant environmental effects associated with implementation of the project. Alternatives discussed in the PEIR include the No Project Alternative (adopted Community Plan), Alternative 1, and Alternative 2. For the purposes of this PEIR, the No Project Alternative would be the continued implementation of the adopted Community Plan with the same land uses as identified in that Community Plan.

1.3.3 PEIR Format

The format and order of contents of this PEIR follow the direction in the City's EIR Guidelines. A brief overview of the various chapters of this PEIR is provided below:

- Executive Summary (CEQA Guidelines Section 15123). Provides a summary of the PEIR, a brief description of the project, identification of areas of controversy, issues to be resolved by the decision-makers, and inclusion of a summary table identifying significant impacts, proposed mitigation measures, and significance of impact after mitigation. A summary of the project alternatives and comparison of the potential impacts of the alternatives with those of the project is also provided.
- Chapter 1.0, Introduction. Contains an overview of the legal authority, purpose, and intended uses of the PEIR, as well as its scope and content.
- Chapter 2.0, Environmental Setting (CEQA Guidelines Section 15125). Provides a description of the project's regional context, location, and existing physical characteristics and land use within the proposed CPU area. An overview of available public infrastructure and services, as well as relationship to relevant plans, is also provided in this chapter. The Environmental Setting chapter is detailed, providing background information relevant to each environmental issue area further addressed in Sections 5.1 through 5.14. Within the proposed CPU impact analysis chapter, the applicable environmental setting discussion contained in Chapter 2.0 is referenced to avoid repetition.
- Chapter 3.0, Project Description (CEQA Guidelines Section 15124). Provides a detailed discussion of the project, including background, objectives, key features, and environmental design considerations.
- Chapter 4.0, Regulatory Framework. Provides a summary of the applicable federal, state, and local environmental laws and requirements relevant to each issue area.
- Chapter 5.0, Environmental Analysis (CEQA Guidelines Section 15126). This chapter provides a detailed community-specific evaluation of potential environmental impacts associated with the project for environmental issues determined through the initial review and public scoping processes to be potentially significant. Chapter 5.0 begins with the issue of land use, followed by the remaining issues in order of significance. The analysis of each issue begins with a reference to the environmental setting and regulatory framework provided in Chapters 2.0 and 4.0, respectively, and a statement of specific thresholds used to determine significance of impacts, followed by an evaluation of potential impacts. If significant impacts are identified, feasible mitigation measures to avoid or reduce any significant impacts are identified. Where mitigation measures are required, a statement regarding the significance of the impact after mitigation is provided.
- Chapter 6.0, Cumulative Impacts (CEQA Guidelines Section 15130). Provides a detailed discussion of the project's incremental effects. According to Section 15065, "cumulatively considerable" means the incremental effects of an individual project are considerable when

viewed in connection with the effect of past projects, the effect of other current projects, and effects of probable future projects as defined in Section 15130.

- Chapter 7.0, Other Mandatory Discussion Areas.
 - Effects Found Not to Be Significant. Identifies all of the issues determined in the scoping and preliminary environmental review process to be not significant for the project, and briefly summarizes the basis for these determinations. For the project, it was determined that environmental issues associated with agriculture, mineral resources, and population and housing would not be significant, and, therefore, are summarized in Chapter 7.0.
 - Growth Inducement (CEQA Guidelines Section 15126.2(d)). Evaluates the potential influence the project may have on economic or population growth within the proposed CPU area, as well as the region, either directly or indirectly.
 - Significant Unavoidable Impacts/Significant Irreversible Environmental Changes/Energy Conservation (CEQA Guidelines Section 15126(b), 15126(c), and 15126.4 (a)(1)) provides a summary of any significant unavoidable impacts of the project as detailed in Chapter 7.0. This chapter also describes the potentially significant irreversible changes that may be expected and addresses the use of nonrenewable resources and energy use anticipated during project implementation.
- Chapter 8.0, Alternatives (CEQA Guidelines Section 15126.6). Provides a description of alternatives to the project, including the No Project Alternative (adopted Community Plan), Alternative 1, and Alternative 2.
- Chapter 9.0, References. Lists all of the reference materials cited in the PEIR.
- Chapter 10.0, Individuals and Agencies Consulted (CEQA Guidelines Section 15129). Identifies all of the individuals and agencies contacted during preparation of the PEIR.
- Chapter 11.0, Certification. Identifies all of the agencies, organizations, and individuals responsible for the preparation of the PEIR.

Technical reports, used as a basis for much of the environmental analysis in the PEIR, have been summarized in the PEIR, and are included as appendices to this PEIR. The technical reports prepared for the project and their location in the PEIR are listed in the table of contents. Availability of the Draft PEIR and the technical appendices is discussed in Section 1.4.1, Draft PEIR.

1.3.4 Incorporation by Reference

As permitted by CEQA Guidelines Section 15150, this PEIR has referenced several technical studies and reports. Information from these documents has been briefly summarized in this PEIR, and their relationship to this PEIR is described. These documents are included in Chapter 9.0, References, are hereby incorporated by reference, and are available for review at the City Planning Department, located at 1010 Second Avenue, Suite 1200, San Diego, California 92101. Included within the list of materials incorporated by reference into this PEIR are the following:

- City of San Diego General Plan (City of San Diego 2008a)
- City of San Diego Program Environmental Impact Report for the General Plan (Final PEIR) (City of San Diego 2007)
- City of San Diego Housing Element FY2013-FY2020 (City of San Diego 2013)
- City of San Diego Municipal Code (SDMC) (City of San Diego 2008b)
 - Old Town San Diego Planned District Ordinance (City of San Diego 2014)
- City of San Diego Old Town San Diego Community Plan, as amended (City of San Diego 1987)
- City of San Diego Climate Action Plan (City of San Diego 2015)

1.4 PEIR Process

The City, as lead agency, is responsible for the preparation and review of this PEIR. The PEIR review process occurs in two basic stages. The first stage is the Draft PEIR, which offers the public the opportunity to comment on the document, while the second stage is the Final PEIR.

1.4.1 Draft PEIR

In accordance with SDMC Section 128.0306 and CEQA Guidelines Section 15105, the Draft PEIR is distributed for review to the public and interested and affected agencies for a review period of 45 days. The purpose of the review period is to allow the public an opportunity to provide comments “on the sufficiency of the document in identifying and analyzing the possible impacts on the environment and ways in which the significant effects of the project might be avoided and mitigated” (Section 15204, CEQA Guidelines). SDMC Section 128.0307 allows the Planning Director to approve requests for additional public review time from the affected officially recognized community planning group, in this case the Old Town Community Planning Group. Approval of additional review time shall not exceed 14 calendar days.

In accordance with Sections 15085 and 15087 (a)(1) of the CEQA Guidelines, upon completion of the Draft PEIR, a Notice of Completion is filed with the State Office of Planning and Research, and a Public Notice of Availability of the Draft PEIR is posted in the *San Diego Daily Transcript*, a newspaper of general circulation in the area.

The Draft PEIR and all related technical studies are available for review during the public review period at the offices of the Planning Department, located at 1010 Second Avenue, Suite 1200, San Diego, California 92101, and on the Planning Department website for CEQA Policy and Review:

<http://www.sandiego.gov/planning/programs/ceqa/>

The proposed CPU’s website is:

<https://www.sandiego.gov/planning/community/cpu/oldtownmidway/oldtownupdate>

Electronic copies of the Draft PEIR are also available at the following public libraries:

- San Diego Central Library
330 Park Boulevard
San Diego, California 92101
- Point Loma/Hervey Library
3701 Voltaire Street
San Diego, California 92107
- Mission Hills Library
925 W. Washington Street
San Diego, California 92103
- Linda Vista Library
2160 Ulric Street
San Diego, California 92111
- Mission Valley Library
2123 Fenton Parkway
San Diego, California 92108

1.4.2 Final PEIR

Following the end of the public review period, the City, as lead agency, will provide written responses to comments received on the Draft PEIR per CEQA Guidelines Section 15088. All comments and responses ~~will be~~ have been considered in the review of the PEIR. Detailed responses to the comments received during public review, a Mitigation Monitoring and Reporting Program (MMRP), Findings of Fact, and a Statement of Overriding Considerations for impacts identified in the PEIR as significant and unavoidable ~~will be~~ have been prepared and compiled as part of the PEIR finalization process. The culmination of this process is a public hearing where the City Council will determine whether to certify the Final PEIR, which includes the MMRP, Findings, and Statement of Overriding Considerations, as being complete and in accordance with CEQA. ~~The~~ This Final PEIR will be available for public review at least 14 days before the City Council public hearing to provide commenters the opportunity to review the written responses to their comment letters.

This page intentionally left blank.



Chapter 2.0

Environmental Setting

At the time of the release of the NOP on November 4, 2015, the PEIR was to discuss the potential impacts of implementing two specific CPUs (i.e., Midway-Pacific Highway and Old Town San Diego). Subsequent to issuance of the NOP, the analysis of the proposed Midway-Pacific Highway CPU was separated from the Old Town San Diego analysis. This chapter discusses the proposed Old Town CPU area setting at the time of the release of the NOP.

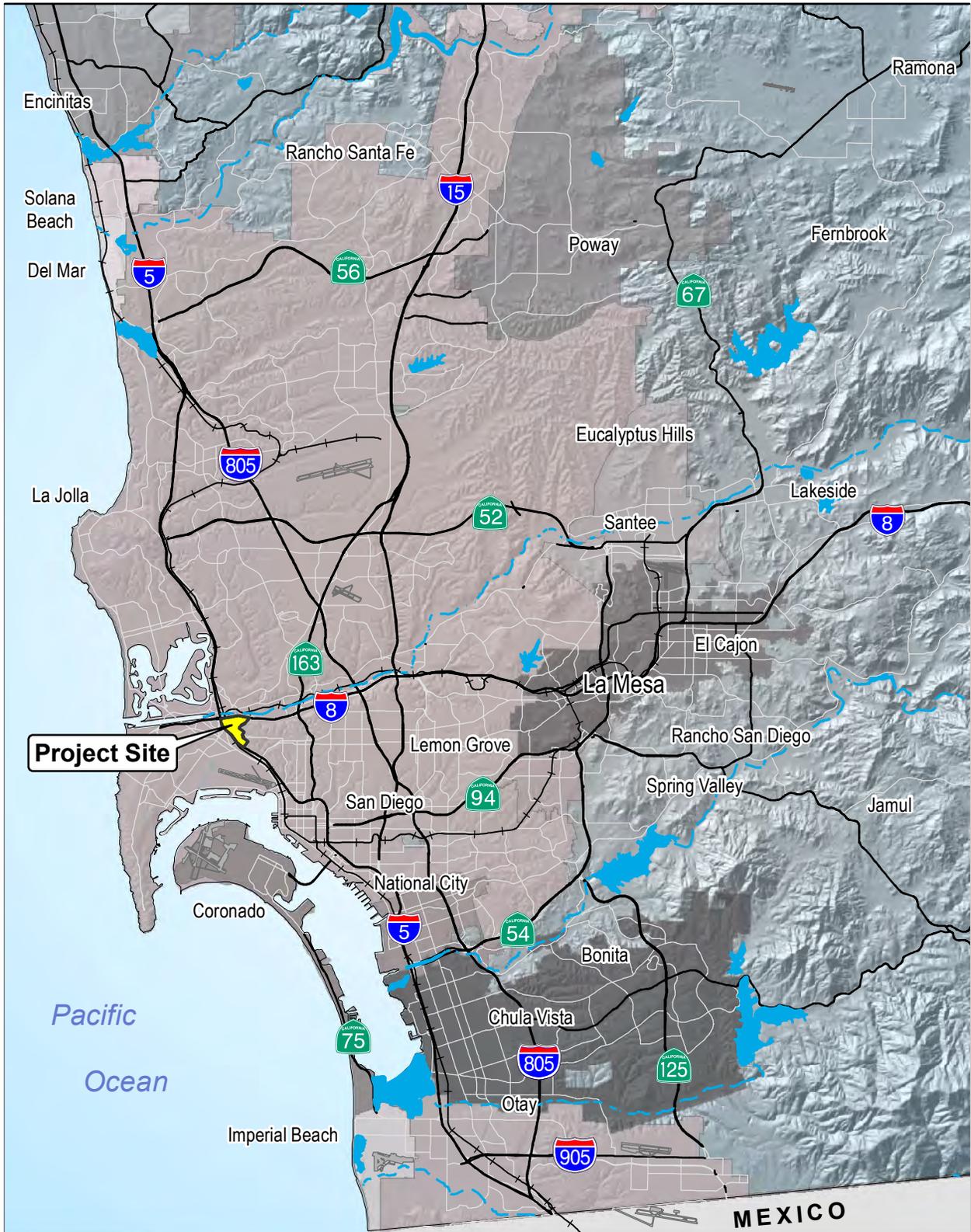
2.1 Regional Location

The proposed Old Town CPU area is centrally located to the northwest of Downtown San Diego and southeast of Mission Bay (Figures 2-1 and 2-2). The Old Town Community Plan area lies between the Midway Pacific-Highway Community Plan area to the west and south, the Uptown eCommunity Plan area to the east, and the Mission Valley Community Plan area to the north.

The proposed Old Town CPU area encompasses roughly 275 acres. I-8 functions as the northern boundary of the Old Town CPU area, while I-5 provides the western boundary; the Mission Hills/Uptown hillsides form the southern and eastern boundaries of the proposed CPU area.

The Old Town community is the site of initial settlement of the City of San Diego and is the birthplace of the State of California. The area's location along the San Diego River, topography, and proximity to the San Diego Bay made it an ideal place for early settlers, and it remained the administrative and economic center of the City of San Diego until 1869. In the mid-nineteenth century, a dike was constructed along Old Town's northern boundary to direct the San Diego River into False Bay (now Mission Bay) to control periodic flooding and silt deposits in San Diego Bay, and in the twentieth century, construction associated with I-8 further cut the proposed Old Town CPU area off from the San Diego River floodplain.

Development of regional transportation infrastructure in the proposed CPU area began in the nineteenth century with construction of the California Southern Railroad and, later, a local electric street railway system. Currently, Old Town San Diego is the location of a major rail and transit station. The Old Town



Source: Esri; SanGIS; SANDAG.

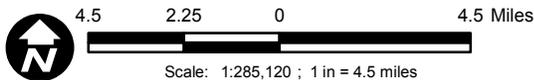


Figure 2-1
Regional Location



LEGEND

 Community Plan Boundary

Source: SANDAG 2014; City of San Diego 2017

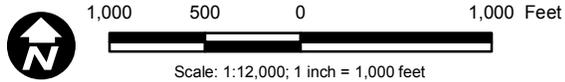


Figure 2-2
Old Town Community Plan Area

Old Town Community Plan Update PEIR

Path: P:_6044\60440144_MidOld_CPU\900-CAD-GIS\920 GIS\922_Maps\CommunityPlan\OldTown_Community_85x11.mxd, 7/19/2017, augellop

Transit Center serves the San Diego Metropolitan Transit System (MTS) light rail line and buses, as well as the Amtrak Pacific Surfliner, which provides rail service as far north as San Luis Obispo, California.

As the use of the automobile increased in the San Diego area in the early twentieth century, construction of highways began, including the highways that would be designated in 1925 as U.S. Highway 101 (still existing in part as Pacific Highway), U.S. Highway 80 and later I-5 and I-8. I-8 and I-5 run along the community's northern and eastern sides, connecting Downtown San Diego to other communities in the City and the region.

The proposed CPU area is predominantly urbanized and is generally characterized by a mix of commercial, residential, park, and institutional uses. Commercial development of the proposed Old Town CPU is generally tourist-oriented and includes restaurant and drinking establishments, retail stores, hotels, and museums. Additional non-residential uses in the community include office space, public parking facilities, and the Caltrans District 11 administrative and operational facility.

2.2 Project Location

The proposed CPU area lies northwest of Downtown San Diego on low, relatively flat land along the San Diego River between Mission Bay and San Diego Bay, with steeper topography in the northeast part of the proposed CPU area. The proposed CPU area includes residential areas, Old Town San Diego State Historic Park, the Presidio Hills Golf Course, Presidio Park, and Heritage Park.

Old Town's overall physical structure reflects its geography and development patterns. The street system has a grid pattern through most of the proposed CPU area, interrupted by institutional and park uses including the San Diego Unified School District's Ballard Parent Center, Old Town San Diego State Historic Park, Presidio Park, the Navy's Public Works facility, and the Caltrans District 11 headquarters.

The proposed CPU area is traversed by a few major streets. Taylor Street runs northeast-southwest across the northern portion of CPU area and intersects perpendicularly with Juan Street and Congress Street, which run southeast-northwest. Pacific Highway and Morena Boulevard provide access to the north end of the proposed CPU area at Taylor Street from surrounding communities. Congress Street provides a connection from Taylor Street to San Diego Avenue, and San Diego Avenue connects Old Town to the Uptown Community. Many roadways within Old Town San Diego State Historic Park, including San Diego Avenue, have been closed to vehicle traffic to recreate the historical townscape and to allow pedestrians to move more easily throughout the area. There are limited roadways within Presidio Park, providing access within the park and also to the Mission Hills neighborhood in the Uptown community planning area.

2.3 Existing Physical Characteristics

2.3.1 Land Use

2.3.1.1 Existing Land Uses

As the birthplace for the City of San Diego, the proposed CPU area has been previously developed and generally characterized as a mix of commercial, residential, and park space. Commercial development

within the proposed CPU area is generally tourist-oriented, and consists of hotels, professional office space, restaurant and drinking establishments, boutiques and specialty shops, jewelry stores, art stores and galleries, craft shops, and museums. Additionally, there are public parking lots and the Caltrans District 11 administrative office and operational facility.

The Old Town community is mostly urbanized, with a limited number of vacant parcels. As depicted in Figure 2-3 and summarized in Table 2-1, the predominant land uses within the Old Town community are transportation (including parking and transit); which accounts for 94.4 acres; parks and open space which cover approximately 65.7 acres; and office land uses, which make up 25.0 acres, out of the roughly 275 total acres within the community. Multi-family and single-family residential uses account for approximately 20.9 acres or 7.6 percent of the total acreage in the community. Commercial retail and hotel uses cover approximately 25.0 acres or 9 percent of the total area within the community. Tourist attraction land uses cover 19.5 acres of land, and institutional facilities utilize 6.8 acres within the community. Self-storage sites along Pacific Highway cover 0.4 acres of land, and communications and utilities take up 0.9 acre of space. Roughly 1.5 acres of the Old Town community are vacant.

The existing land uses and distribution are discussed further below.

Land Use	Acres
Residential - Single Family	8.9
Residential - Multi-Family	12.0
Retail Commercial	13.0
Hotel	10.4
Office	25.0
Self-Storage	0.4
Tourist Attraction	19.5
Institutional	6.8
Military	2.9
Parks and Open Space	65.7
Parking Lot	5.4
Transit Center	4.9
Communications and Utilities	0.9
Transportation	94.4
Undevelopable Natural Area	0.4
Vacant Building	2.5
Vacant Land	1.5
Total	274.6

a. Residential

Residential land uses make up 20.9 acres in the community. Residential uses within the community include single-family homes, multi-family duplexes, apartments, and condominiums, totaling 474 housing units (2017).

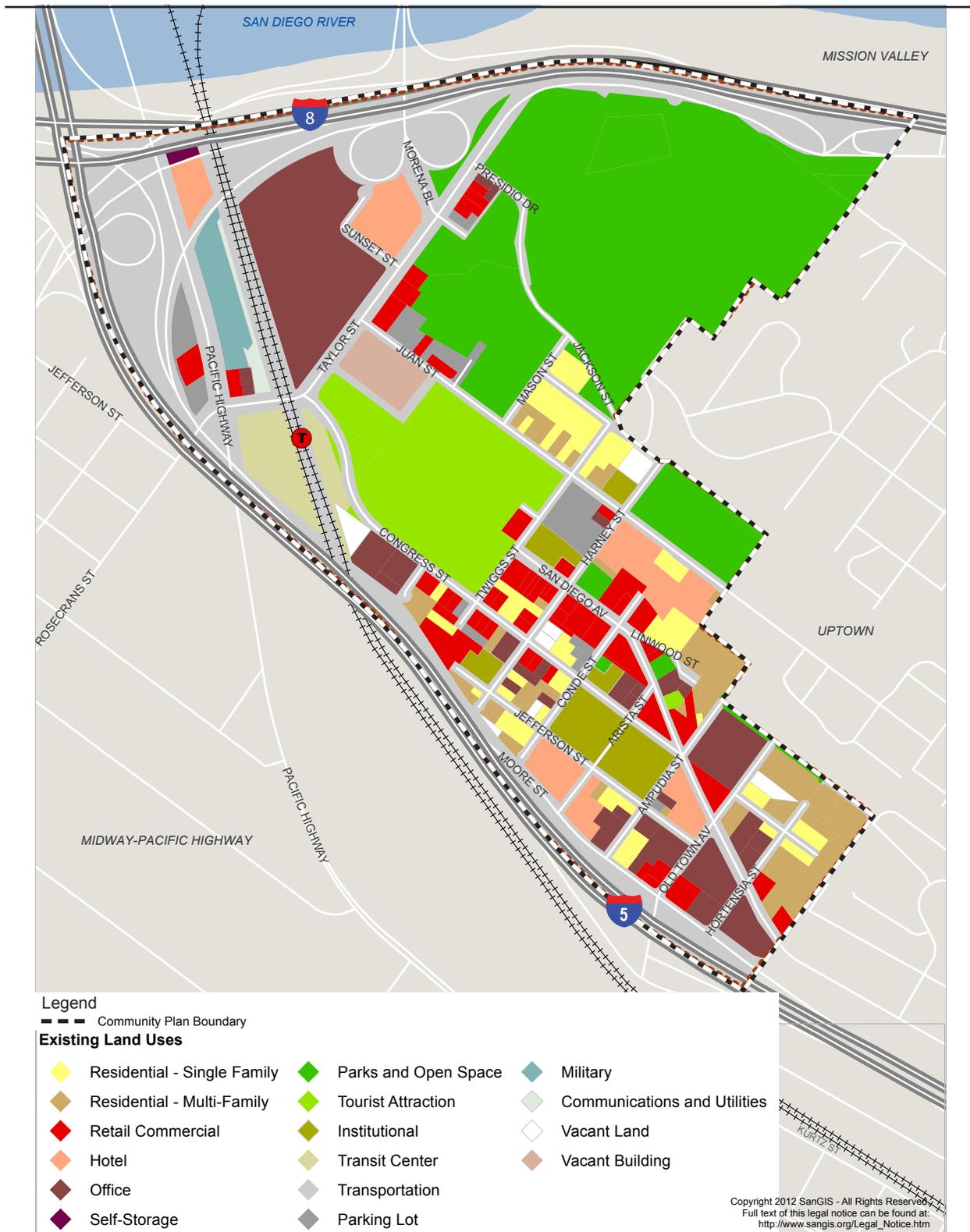


Figure 2-3
Existing Land Use

b. Commercial/Mixed-Use

Commercial land uses within the community include retail, hotel, restaurants, and professional offices. Commercial uses are small in scale and pedestrian-oriented, and serve both residential customers and visitors. The Caltrans District 11 Offices on Taylor Street are categorized as an office use for the purposes of environmental analysis. About 24 percent of the community is made up of commercial land uses.

c. Institutional

Institutional uses provide either public or private facilities that serve a public benefit. These uses may serve the community or a broader area. Major institutional land uses within the community consist mainly of the Fremont School/Ballard Parent Center, Old Town Transit Center, U.S. Navy Public Works facility, Mormon Battalion Historic Center, and Old Adobe Chapel Historic Site. Fire stations, libraries, and police facilities that serve the area are located outside of the proposed CPU area.

d. Tourist Attraction

Tourist Attraction land uses include historical districts, historical sites, and museums that attract visitors from the City, County, and beyond. Approximately 19.5 percent of the land within the Old Town CPU area is comprised of tourist attractions, which include the San Diego Royal Presidio in Presidio Park, the San Diego History Center – Serra Museum, Old Town San Diego State Historic Park, the San Diego County Sheriff's Museum, the Whaley House, the El Campo Santo Cemetery, and the Old Adobe Chapel.

e. Parks and Open Space

Parks and open space areas fulfill a variety of important purposes in the community including active and passive recreation. About 24 percent of the land within the proposed Old Town CPU area is designated as parks and open space. This includes Presidio Hills Golf Course, Presidio Park, Presidio Community Park and Recreation Center, and Heritage Park.

2.3.1.2 Adopted Old Town Community Plan

The adopted Old Town San Diego Community Plan (adopted Community Plan [City of San Diego 1987]) was prepared to preserve and enhance the historical significance of Old Town San Diego and create a balanced development plan, as a large amount of commercial development had begun in the area. The adopted Community Plan provides more detailed land use, design, roadway, and implementation policies and information than is found in the General Plan. The adopted Community Plan identifies key issues in the community and enumerates a set of goals and objectives to achieve the community's vision. Specific policies to implement the adopted Community Plan's vision are contained in its elements: Historical Conservation; Socio-Economic Development; Land Use; Safety; Open Space and Recreation; Circulation; Public Facilities and Utilities; and Urban Design. The adopted Community Plan would be replaced by the proposed CPU.

2.3.2 Transportation and Circulation

Portions of the Old Town community have a grid-like street network with small blocks. The Old Town San Diego State Historic Park is largely closed to motor-vehicle traffic. Additionally, Presidio Park has very few roads traveling through the park space. Few of the streets within the proposed CPU area provide connectivity to adjacent communities, as many of the community's roadways are not through streets due to the constraints created by the hillsides of the Uptown community and freeway infrastructure. Traffic circulation patterns within the Old Town community reflect that freeways form the western (I-5) and northern (I-8) boundaries of the community. Truck transport of goods occurs near the proposed CPU area on these freeways.

2.3.2.1 Roadways and Access

Freeway access in the vicinity of the proposed Old Town CPU area is provided via I-5, which is a north-south route, and I-8, which is an east-west route. These freeways provide regional transportation access.

Major roadways within the Old Town community generally run in a northeast-southwest and northwest-southeast direction. As stated previously, many of the roadways within the proposed CPU area are not through streets. Taylor Street provides east-west access from Pacific Highway to Mission Valley and I-8. Juan Street provides north-south access from Taylor Street to the Mission Hills neighborhood along the eastern portion of proposed CPU area. Pacific Highway provides north-south access between Downtown and Mission Bay along the western portion of the proposed CPU area. Morena Boulevard provides north-south access to Linda Vista and I-8 in the northern portion of the proposed CPU area. Old Town Avenue provides east-west access from I-5 to San Diego Avenue. San Diego Avenue is the primary north-south street that connects the Old Town commercial core to Washington Street in Uptown. Most of the major roadway segments within the Old Town community currently meet acceptable levels of service as defined by City thresholds. However, three segments current exceed roadway capacity thresholds.

2.3.2.2 Public Transportation

The City works with local agencies to provide transportation systems for its residents and visitors. Bus (including Rapid Bus) and light rail transit (San Diego Trolley) service are provided by the San Diego MTS, as well as commuter rail (Coaster) service, which is provided by the North County Transit District (NCTD). The Old Town community is served by the San Diego Trolley Green line and bus service operated by MTS. The San Diego Trolley Green Line runs between Santee and Downtown San Diego through Old Town San Diego and has stops at the Old Town Transit Center within the proposed CPU area.

a. Rapid Bus

Rapid Bus transit is corridor-level bus service providing fast and frequent services that are designed to take advantage of both freeway improvements, such as High Occupancy Vehicle and managed lanes, and arterial improvements in order to serve longer distance regional trips. The Rapid Bus service will operate on arterial roadways and provide limited-stop, high-speed service along several key corridors throughout the region, supplementing existing local bus service.

b. Light Rail Transit (LRT)

LRT is a type of transit vehicle and service that uses steel wheels and operates over railroad tracks. LRT systems generally serve stations averaging 1 mile apart, are not remotely controlled, and can operate in a separated right-of-way or on public streets. The San Diego Trolley is a regional serving LRT system operated by MTS. The Trolley Green line stops at the Old Town Transit center with between San Ysidro, Santee, San Diego State University, and Downtown. The existing rail line parallels I-5 and crosses the San Diego River towards Mission Valley. The Mid-Coast Trolley extension is currently under construction and will provided service from Downtown and Old Town to the University of California San Diego and the University commons.

2.3.2.3 Heavy Rail

The Burlington Northern Santa Fe (BNSF) Railroad operates at night along separate tracks paralleling the trolley tracks. Amtrak operates the Pacific Surfliner passenger train that runs from the Santa Fe Depot in Downtown San Diego to San Luis Obispo in Central California. The NCTD operates the Coaster, which takes passengers along the Pacific coast from Oceanside, California, to the Santa Fe Depot, located Downtown San Diego. The Pacific Surfliner passenger train and NCTD Coaster stop at the Old Town Transit Center are in the proposed CPU area.

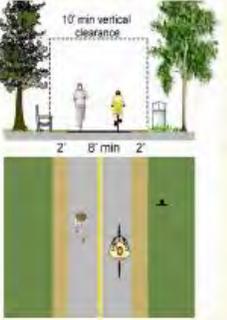
2.3.2.4 Bicycle Facilities

Types of bicycle facilities, as classified for the purposes of mobility planning, include bicycle paths (Class I), bicycle lanes (Class II), bicycle routes (Class III), and cycle tracks (Class IV) (Table 2-2). Bicycle boulevards and cycle tracks are additional facilities that are not defined by Caltrans and are not part of the existing bicycle network in the Old Town community. Existing and proposed bicycle facilities in the Old Town Community are further described in Section 5.2.1.6 of this PEIR.

2.3.2.5 Pedestrian Facilities

Types of pedestrian routes, as classified for the purposes of mobility planning, include district sidewalks, corridor sidewalks, connector sidewalks, neighborhood sidewalks, and pedestrian paths. District sidewalks include heavy pedestrian levels and an identifiable focus to encourage walking within a district node. Corridor sidewalks include moderate pedestrian levels that connect to district nodes. Connector sidewalks include lower pedestrian levels that connect to corridor or district sidewalks. Neighborhood sidewalks include low to moderate pedestrian levels within residential areas and paths include routes that are exclusive to pedestrian and bicycles and are not associated with streets. Discussion of existing pedestrian facilities in the community can be found in Section 5.2.1.6(c) of this PEIR.

**Table 2-2
Bicycle Facilities Classification System**

<p>Class I - Bike Path</p> <p>Bike paths, also termed shared-use or multi-use paths, are paved rights-of-way for exclusive use by bicyclists, pedestrians, and those using non-motorized modes of travel. They are physically separated from vehicular traffic and can be constructed in roadway right-of-way or exclusive right-of-way. Bike paths provide critical connections where roadways are absent or not conducive to bicycle travel.</p>		<p>Class III - Bike Route</p> <p>Bike routes provide shared use with motor vehicle traffic within the same travel lane. Designated by signs, bike routes provide continuity to other bike facilities or designate preferred routes through corridors with high demand. Whenever possible, bike routes should be enhanced with treatments that improve safety and connectivity, such as the use of "Sharrows" or shared lane markings to delineate that the road is a shared-use facility.</p>	
<p>Class II - Bike Lane</p> <p>Bike lanes are defined by pavement striping and signs used to allocate a portion of a roadway for exclusive or preferential bicycle travel. Bike lanes are one-way facilities on either side of a roadway. Bike lanes enable bicyclists to ride at their preferred speed without interference from prevailing traffic conditions. Bike lanes also facilitate predictable behavior and movements between bicyclists and motorists. Whenever possible, bike lanes should be enhanced with treatments that improve safety and connectivity by addressing site-specific issues, such as additional warning or wayfinding signs. Enhanced buffered bike lanes add additional striping and lateral clearance between bicyclists and vehicles, leading to lowered levels of stress for riders.</p>		<p>Class IV - Cycle Track</p> <p>A cycle track is a hybrid type bicycle facility that combines the experience of a separated path with the on-street infrastructure of a conventional bike lane. Cycle tracks are bikeways located in roadway right-of-way but separated from vehicle lanes by physical barrier or buffers. Cycle tracks provide for one-way bicycle travel in each direction adjacent to vehicular travel lanes and are exclusively for bicycle use. Cycle tracks are not recognized by Caltrans Highway Design Manual as a bikeway facility. To provide bicyclists with the option of riding outside of the cycle track to position themselves for a left or right turn, parallel bikeways should be added adjacent to cycle track facilities whenever feasible.</p>	

2.3.3 Historical and Tribal Cultural Resources

A Tribal Cultural Resource is defined as a site, feature, place, cultural landscape, sacred place or object, which is of cultural value to a Tribe, and is either: on or eligible for listing in the national, state or a local historic register, or the lead agency, at its discretion, chooses to treat the resource as a Tribal Cultural Resource (adopted Community Plan, as amended).

Historical resources are physical features, both natural and constructed, that reflect past human existence and are of historical, archaeological, scientific, educational, cultural, architectural, aesthetic, or traditional significance. These resources may include such physical objects and features as archaeological sites and artifacts, buildings, groups of buildings, structures, districts, street furniture, signs, cultural properties, and landscapes. Historical resources in the San Diego region span a timeframe of at least the last 10,000 years and include both the prehistoric and historic periods. For purposes of the PEIR, historical resources consist of archaeological sites and built environment resources determined as significant under CEQA.

Archaeological resources include prehistoric and historic locations or sites where human actions have resulted in detectable changes to the area. This can include changes in the soil, as well as the presence of physical cultural remains. Archaeological resources can have a surface component, a subsurface component, or both. Historic archaeological resources are those originating after European contact. These resources may include subsurface features such as wells, cisterns, or privies. Other historic archaeological remains include artifact concentrations, building foundations, or remnants of structures.

2.3.3.1 Prehistory

The prehistoric cultural sequence for what is now San Diego County is generally thought of as three basic periods: Paleoindian, locally characterized by the San Dieguito complex; Archaic, characterized by the cobble and core technology of the La Jolla and Pauma complexes; and Late Prehistoric, marked by the appearance of ceramics, small arrow points, and cremation burial practices. Late Prehistoric materials in southern San Diego County, known as Yuman I and Yuman II, are believed to represent the ancestral Kumeyaay.

For people intimate with their physical surroundings, the landscape is a place with many attributes beyond simple physical description. The Kumeyaay have roots that extend thousands of years in the area that is now San Diego County and northern Baja California, and there are hundreds of words that describe a given landform, showing a close connection with nature. There are also stories associated with the land. The San Diego area in general, including the community of Old Town and the City as it existed as late as the 1920s, was known as *qapai* (meaning uncertain). Some native speakers referred to what is now I-8 as *oon-ya*, meaning trail or road, describing one of the main routes linking the interior of San Diego with the coast. The floodplain from the San Diego Mission to the ocean was *hajir* or *qajir* (Harrington 1925, 1927).

By the time Spanish colonists began to settle in Alta California in 1769, the areas that are now part of the Old Town community were within the territory of the Kumeyaay people, a cultural group comprised of exogamous, nontotemic territorial bands with patrilineal descent. The Kumeyaay had a hunting and gathering economy based primarily on various plant resources. During prehistoric occupation of the proposed CPU area, native vegetation was composed of chamise chaparral (chamise [*Adenstoma fasciculatum*]), coastal sage scrub, and mixed chaparral vegetation communities. Major constituents of chaparral are chaise, ceanothus (*Ceanothus* spp.), and scrub oak (*Quercus beberidifolia* and *Q. dumosa*). Coastal sage scrub communities are characterized by coastal sage brush (*Artemisia californica*), black sage (*Salvia mellifera*), white sage (*S. apiana*), laurel sumac (*Malosma laurina*), lemonade berry (*Rhus integrifolia*), California buckwheat (*Eriogonum fasciculatum*), brittle bush (*Encelia californica*), and toyon (*Heteromeles arbutifolia*). Grass seeds were a staple food resource second only to acorns in the Late Prehistoric native diet, supplemented by other seeds and nuts. Small game such as rabbits, jackrabbits, and rodents were important to the prehistoric diet; deer were somewhat less significant for food, but were an important source of leather, bone, and antlers. Coastal bands ate a great deal of fish, taking them with lines, nets, and bows and arrows. Balsas or reed boats were used. Shellfish and other littoral resources were important to coastal people, too. Settlements were moved seasonally to areas where wild foods were in season.

Villages and campsites were generally located in areas where water was readily available, preferably on a year-round basis. The San Diego River, which is located along the northern boundary of the proposed

Old Town CPU area, provided an important resource not only as a reliable source of water, but as a major transportation corridor through the region. Although the actual location of the Native American village of the *Kosti/Cosoy/Kosaii/Kosa'aay* is unknown, it has been described as being near the mouth of the San Diego River and also reported by Bancroft in 1884 that a site called *Cosoy/Kosaii/Kosa'aay* by the Native Americans was in the vicinity of Presidio Hill and Old Town and took its name from the Kumeyaay word for drying place or dry place. Native Americans still lived near the Presidio as late as 1822, as indicated by accounts that a leader from a rancharía “not far distant from the Presidio of St. Diego” was killed by his own villagers and replaced by a new leader in an imitation of the deposing of the Spanish leadership and proclamation of Mexican independence (AECOM 2015). Several investigations have identified possible locations for the village of *Kosti/Cosoy/Kosaii/Kosa'aay*, but the actual site has never been found. According to Dumas, some native speakers also referred to what is now Interstate 8 (I-8) as *oon-ya*, meaning trail or road, describing one of the main routes linking the interior of San Diego with the coast.

2.3.3.2 History

Spanish colonization of Alta California began in 1769. Camp was initially set up near present-day Downtown San Diego; however, the settlement was soon moved closer to the San Diego River, near the Kumeyaay village of *Kosti/Cosoy/Kosaii/Kosa'aay*. By 1774, the mission was moved up the river valley to present-day Mission Valley, while the presidio remained on Presidio Hill. The settlement continued to expand throughout the late 1700s and early 1800s to include more permanent structures and agricultural installations. The La Playa Trail, which is marked at the base of Presidio Park, generally corresponds to present-day Taylor Street and Rosecrans Street. It was the main link between Old San Diego, the mission, and the La Playa ship landing (present-day Point Loma peninsula), and was also known to be an ancient Kumeyaay path. The San Diego Historical Society (now known as the San Diego History Center) initiated a program of marking the 12-mile trail in the early 1930s. Rose Hanks designed a 4-foot high concrete marker that was placed in six locations. Olive trees were planted next to the markers and at half-mile intervals staggered from the left to the right side of the trail. In addition to the marker at the base of Presidio Park, another marker is located west of the intersection of Midway Drive and Rosecrans Street in the Midway-Pacific Highway community and another can be found on the west side of Rosecrans Street south of Shelter Island Drive in the Peninsula Community planning area.

The San Diego Presidio and chapel formed the first permanent Spanish colonial facilities in Alta California following the decades of Spanish Settlement in Baja California. The Presidio housed soldiers and their families, craftsmen, native workers, and other individuals prior to the establishment of the pueblo that became Old Town in the 1830s. There were rarely more than 70 occupants at the Presidio at any given time. When people began to move to the area now known as Old Town, they built adobe homes and other buildings, planted orchards, and tended to small gardens and farms.

The cemetery at the Royal Presidio de San Diego was in use from its founding in 1769 at the first mission in Alta California to as late as 1876, almost 40 years after the abandonment of the Presidio fortifications. There may have been two cemeteries, one forming the consecrated grounds in and around the Presidio chapel and a second burial area for non-converted or non-Catholics. The Native Americans of local heritage who were buried at the Presidio were Kumeyaay, and most other members of the indigenous population were of mixed heritage coming from the interior of Mexico or Baja California. Kumeyaay (Ipai/Tipai) people buried at the Presidio came from a wide range of villages throughout the San Diego

region, and reflect the success of conversion of Kumeyaay at several nearby villages and the failure to convert Kumeyaay at others. The villages most represented in the death and burial records were those closest to the Presidio, including *Apusquel*, *Rincon de Jamo*, *Las Choyas*, and *Ystagua*, all within 6 miles of Community Plan Updates – Old Town San Diego the Presidio. Buried Native Americans were from the missions of Baja California, including San Miguel, San Ignacio, San Gertrudis, San Fernando de Velicata, and San Xavier. Between circa 1820 and 1890, substantial numbers of Native Americans worked and lived in the Mexican pueblo that later became an American village and then a town as evidenced in the archaeological record which identified flaked implements of ceramic and glass, as well as forms of Tizon Brownware that reflect culture change and acculturation. These artifacts manufactured and used by Native Americans in the historic setting serve as evidence of this change.

In 1822, Mexico won its independence from Spain, and San Diego became a part of the Mexican Republic. By 1835, San Diego had a population of nearly 500 residents and was granted official pueblo status. During the period of Mexican rule, San Diego adopted the rancho system of large agricultural estates and there was a rise of the civilian pueblo. Tension with the Native Americans coupled with political and economic instability led to a sharp population decline in San Diego, down to about 150 people by 1840. San Diego's pueblo status was rescinded, and it was made a sub-prefecture of the Los Angeles pueblo.

By the mid-19th century, San Diego had approximately 650 residents. However, new arrivals were transforming the small Mexican community into a growing commercial center. In 1867, Alonzo Erastus Horton acquired nearly 1,000 acres of land 2 miles south of "Old Town", where Downtown San Diego sits today. Dubbed "New San Diego," Horton orchestrated the creation of a new city center, relocating the City's first bank, main newspaper, and several government buildings to this site. Thus, Old Town was supplanted as the City's primary commercial center. The arrival of the transcontinental railroad in the 1880s linked San Diego with the eastern United States and sparked its first building boom. By 1887, San Diego's population had spiked to 40,000, and large tracts of new development began to appear on the hills immediately adjacent to Downtown.

By 1892, substantial infrastructure improvements were underway, including public utilities, street paving, sewer systems, and the electrification of the streetcar system. These improvements would be critical to the development of new suburbs surrounding Downtown and the 1,400-acre City Park (Balboa Park), including the present-day communities of North Park, Hillcrest, University Heights, and Golden Hill.

After the American victory in the Mexican-American War (1846-1848), the Mexican village at Old Town began a gradual transition to an American town. While for many years Old Town remained the center of civic life in the area, frequent flooding of the San Diego River minimized the potential to expand Old Town as a major settlement. The San Diego River naturally switched back and forth between emptying into Mission Bay and emptying into San Diego Bay. In 1853, a dike was built just south of the present flood channel so that Mission Bay became the permanent outlet for the San Diego River.

As in the Mexican era, Native Americans played a vital role in the development and maintenance of the community during the American period. On occasion, large numbers of Native Americans were used for manual labor on large-scale projects, such as the construction of the Derby Dike, which enlisted at least 100 Native Americans to help divert the flow of the San Diego River. The Native American work force camped at the foot of Presidio Hill near the dike. Native Americans also worked on the docks and piers, made and repaired ropes, and helped haul freight from the landings.

In 1870, the first plat map of Old Town was made. The map showed regularly shaped subdivision blocks that radiated out in all directions from the present-day Old Town Plaza. The blocks measured 300 square feet with 50-foot-wide access streets. At that time, Old Town included approximately 174 individual square blocks.

In 1885, Father Anthony Ubach established the St. Anthony's Industrial School for Native Americans in Old Town in the old Casa de Aguirre on the corner of Twiggs Street and San Diego Avenue. Until its transfer to Mission San Diego in 1891, this school gave Native American children from throughout San Diego County academic education and practical skills training. This introduction of Native American children to the Old Town community, even though short-lived, was an important event in local history.

The Native Americans of Old Town who began their presence as expatriates from Mission San Diego after secularization or as people drawn from their native villages to the households of the *Californios* in the 1835–1850 era continued to work, live, and be buried in the community well into the late 1880s. In many ways their experience in Old Town in the post-mission period was a continuation of the colonial pattern begun in 1769 with establishment of Mission San Diego. Their lives and their contributions form an important thread in the tapestry of San Diego history.

The expansion of rail lines to Old Town at the turn of the 20th century likely encouraged commercial, residential, and institutional development in the area. The pace of development during this time was moderate, with single- and multi-family residences being constructed largely along Harney and Congress streets. Light commercial development occurred, but it remained scattered along Congress Street and San Diego Avenue.

Residential and commercial development in the Old Town area continued to expand into the 20th century, including the Old Mission Olive Works packing plant, completed in 1915, and the Presidio Hills Golf Course and residential subdivision developed by George Marston completed in the 1920s. As San Diego continued to grow, efforts were made to preserve the historical importance of Old Town and provide a destination for tourists and local visitors. In the early 1900s, the popularity of the automobile gave rise to “auto touring” as a recreational activity. Travelers from around the United States came to Southern California to drive from Los Angeles to San Diego. New roads were constructed to attract visitors, and Old Town became a major tourist destination. As tourism increased, retail stores, especially souvenir shops, began to be constructed, and many restaurants and cafes were opened to serve the visitors. In 1929, Presidio Park was donated to the City by George Marston to provide a memorial for the first European settlers of California, a public park, and a museum. In the 1930s, Old Town began to document its historic resources, which has resulted in the preservation of much of San Diego's earliest built environment resources.

In the 1940s, war-related housing and industrial development occurred in the community. After World War II, a renewed interest in Old Town's historic resources emerged. From 1956 to 1969 there was an emphasis on restoration in the Old Town community, and five historic sites were restored: the Whaley House, Mason Street School, the Casa de Pedorena, the Casa de Estudillo, and the Casa de Machado-Stewart. Demolished buildings were reconstructed, and others were relocated to avoid demolition. In 1968, a portion of Old Town became a California State Park and, in 1971, the area was added to the National Register of Historic Places (NRHP) as the Old Town San Diego Historic District. Additionally, to preserve the character of the area, new in-fill construction was required to be constructed in “general accord with the appearance of structures built in Old San Diego prior to 1871” (Criteria – Old San Diego

Architectural Control District, 1967). Heritage Park, adjacent to Uptown, was formed to house structures that were threatened with demolition in Downtown San Diego. The structures currently located in Heritage Park were relocated there and restored.

2.3.4 Geologic Conditions

The City of San Diego is located within the Peninsular Ranges geomorphic province, which is characterized by generally northwest trending mountains and valleys, located south of the Transverse Ranges, and west of the Mojave and Colorado deserts. Offshore continental borderland areas south of the Transverse Ranges also are included within the Peninsular Ranges. Landforms and topography (physiography) around the project area are controlled by the distribution and character of geologic units, by fault movements, and by climate and erosion, all of which contribute to the sculpture of the landscape. The generally north-to-northwest-trending coastline and mountains to the east are influenced by the Newport-Inglewood-Rose Canyon and the Elsinore-Julian fault zones, respectively.

In the western and northern portions of Old Town, elevations are in the range of 15 feet to 20 feet up to the Mission Hills at Presidio Park. Most of the remainder of the developed portion of Old Town to the south ranges in elevation between 20 feet and 40 feet. The Mission Hills on the eastern border of Old Town range between elevations of 40 feet and 190 feet (in Presidio Park).

2.3.4.1 Soils and Geologic Formations

The proposed CPU area is underlain by four surficial soil deposits and two geologic formations. The surficial soils include artificial fill, landslide deposits, old paralic deposits (Qop unit 6), and very old paralic deposits unit 11. The geologic formations include San Diego Formation and Pomerado/Mission Valley Formation (Wilson Geosciences Inc. 2012). Figure 2-4 illustrates the geologic units located within the proposed CPU area. A general discussion of the surficial soils and geologic formations is presented below.

a. Artificial Fill (af)

Artificial fill underlies approximately the western half of the proposed CPU area. Though not a true geologic deposit, artificial (man-placed) fill materials consist of reconstituted geologic materials placed either with or without engineering compaction and controls. These deposits are generally poorly to well consolidated, poorly sorted and permeable, sand, silt, gravel, and clay derived from the local bays and river beds. For nonengineered fill, the potential for compressibility, excessive moisture, seismic instability, and settlement are typically similar to young alluvium. Except for artificial fill compacted with engineering controls, the suitability for construction may range from poor to fair. Artificial fill and underlying young alluvium are susceptible to liquefaction and lateral spread, as well as, consolidation, settlement and subsidence exacerbated by earthquakes, all of which can lead to damage to overlying man-made structures. The location, extent, and suitability of the fill within the proposed CPU area would need to be determined during site-specific geotechnical investigations.

b. Landslide Deposits, Undivided (Qls)

One landslide deposit (Pleistocene to Holocene) of approximately 15 acres was found, located in the northernmost portion of the proposed CPU area. This deposit is assumed within the Mission Valley Formation where bedrock is overlain by the old paralic deposits. Landslide deposits are highly fragmented to largely coherent and can vary from unconsolidated to moderately well consolidated. These deposits are susceptible to settlement, dynamic consolidation, slope instability, and likely possess poor foundation characteristics.

c. Old Paralic Deposits Unit 6 (Qop₆, Bay Point Formation)

The old paralic deposits mapped in the eastern half of the proposed CPU area belong to Unit 6, which formed during the Late to Middle Pleistocene. Generally, paralic deposits include marine and nonmarine deposits that accumulated at or near sea level in environments such as deltas, estuaries, tidal flats, beaches, lagoons, and shallow subtidal shelves. The deposits in the project area are mostly poorly sorted, moderately permeable, reddish-brown, interfingering strandline, beach, estuarine, and colluvial deposits composed of siltstone, sandstone, and conglomerate. These deposits rest on the 22- to 23-meter Nestor terrace. The deposits are possibly susceptible to liquefaction, settlement, dynamic consolidation, slope instability, and likely possess poor to very good foundation characteristics (Kennedy and Tan 2008).

d. Very Old Paralic Deposits Unit 11 (Qvop₁₁)

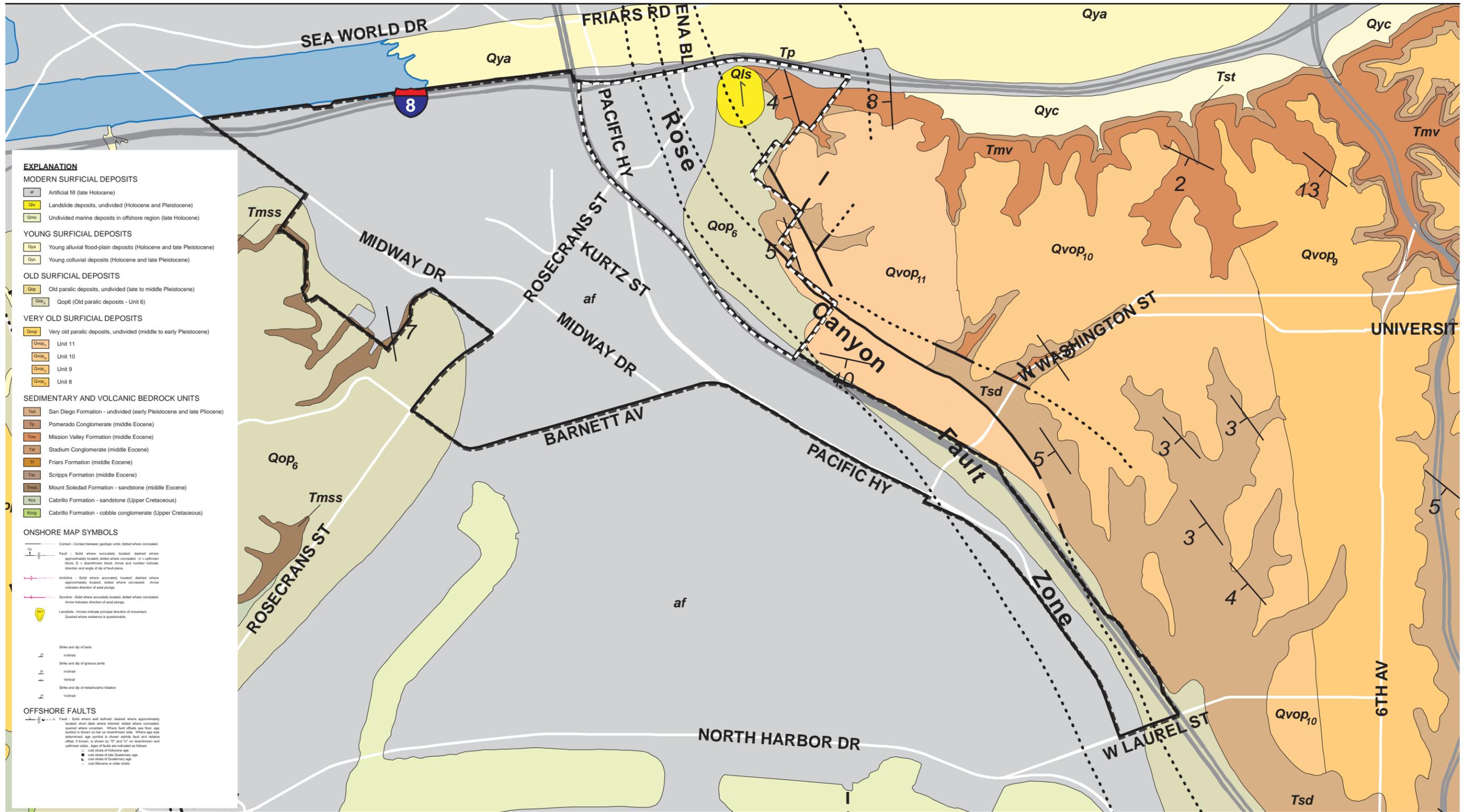
The very old paralic deposits mapped in the southeastern corner of the proposed CPU area belong to Unit 11, which formed during the Middle to Early Pleistocene. These deposits are mostly poorly sorted, moderately permeable, reddish-brown, interfingering strandline, beach, estuarine and colluvial deposits composed of siltstone, sandstone, and conglomerate; upper surfaces may be capped by moderate to well-developed pedogenic soils. These deposits rest on the 92- to 94-meter Clairemont terrace. The deposits are not susceptible to liquefaction, but are possibly susceptible to settlement, dynamic consolidation, expansive soils, and slope instability, and likely possess good to excellent foundation characteristics (Kennedy and Tan 2008).

e. San Diego Formation (Tsd)

The Pliocene-age San Diego Formation mapped in the east-central area of the proposed CPU area consists of predominantly yellowish-brown and gray, fine- to medium-grained, poorly indurated fossiliferous marine sandstone found with reddish-brown, transitional marine and non-marine pebble and cobble conglomerate in areas where sandstone and conglomerate are undivided. It is made up of approximately 75 meters of marine and 9 meters of non-marine sedimentary rocks. This formation is not susceptible to liquefaction, but is possibly susceptible to settlement, dynamic consolidation, and slope instability, and likely possesses good to excellent foundation characteristics (Kennedy and Tan 2008).

f. Mission Valley Formation (Tmv)

The Mission Valley Formation (middle Eocene) mapped in the northeastern portion of the proposed CPU area is predominantly light-olive-gray, soft and friable, fine- to medium-grained marine and non-marine sandstone containing cobble conglomerate in discontinuous beds. This formation has a maximum



Source: Kennedy and Tan, 2008

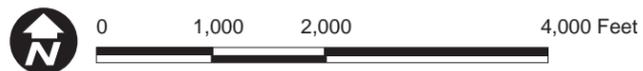
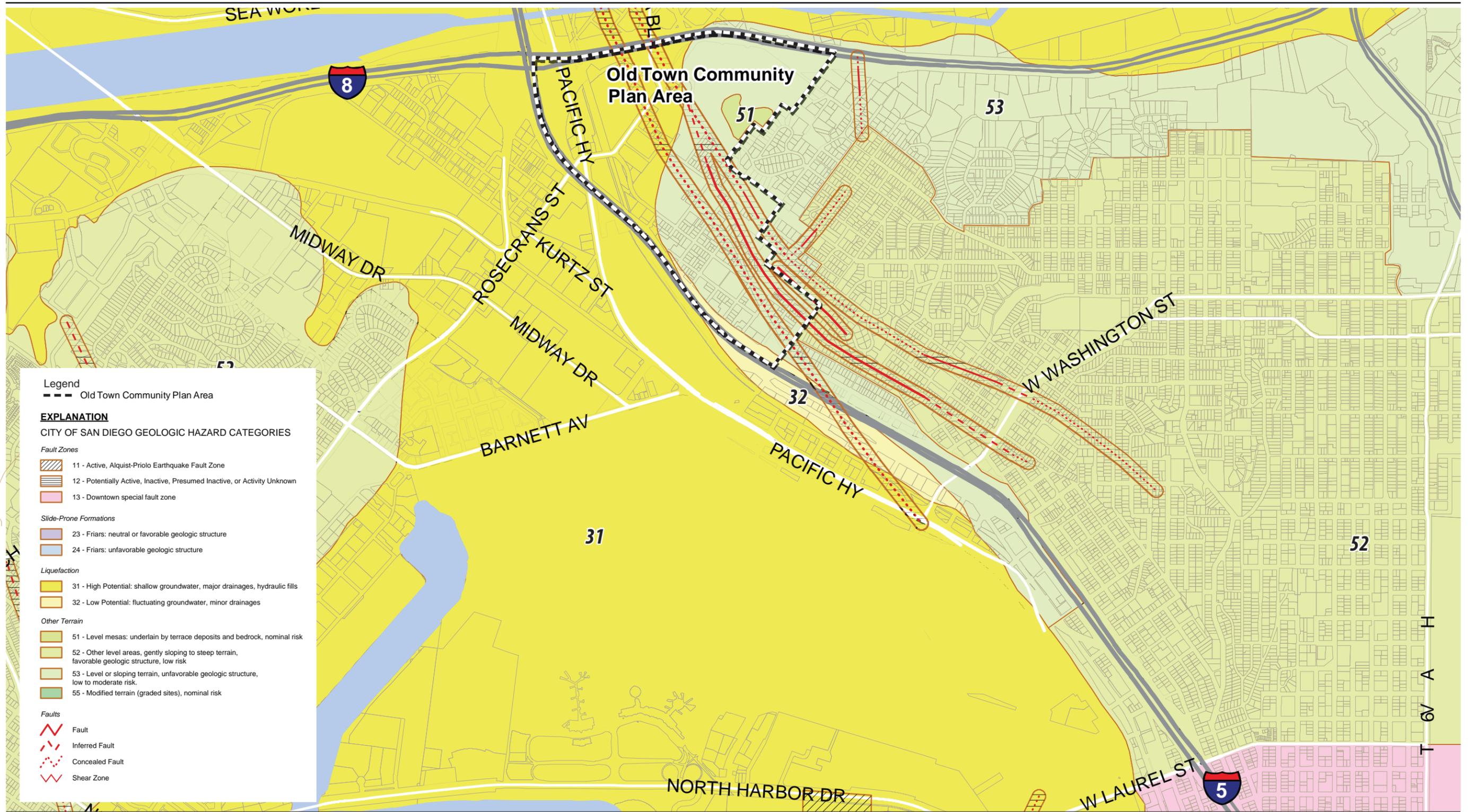


Figure 2-4
Geologic Conditions



Source: SanGIS, City of San Diego, 2011



Figure 2-5
Geologic Hazards and Faults

thickness of 60 meters and has similar engineering properties as the San Diego Formation. The Mission Valley Formation is generally flat-lying or nearly horizontally bedded and is favorable for overall slope stability.

2.3.4.2 Faulting and Seismicity

a. Geologic Hazard Category

The *City of San Diego Seismic Safety Study, Geologic Hazards and Faults* (City of San Diego 2008a), maps the western half of the proposed CPU area as high potential for liquefaction with shallow groundwater, major drainages, and hydraulic fills (Geologic Hazard Category 31). The eastern half of the proposed CPU area is predominately mapped as low to moderate risk with level or sloping terrain and unfavorable geologic structure (Geologic Hazard Category 53) with a small area of nominal risk and level mesas underlain by terrace deposits and bedrock (Geologic Hazard Category 51) on the west side of Presidio Park along Cosoy Way. A small sliver along Moore Street on the southern end of the proposed CPU area is mapped as low potential for liquefaction with fluctuating groundwater and minor drainages (Geologic Hazard Category 32). The Mission Bay and Old Town fault strands (Geologic Hazard Category 12), part of the Rose Canyon Fault Zone (RCFZ), trend north-south and northwest-southeast through the center of the project area. Figure 2-5 provides a map of geologic hazards for the proposed CPU area as identified in the Seismic and Geologic Technical Background Report (Appendix F).

b. Faulting

The active RCFZ trends northwest-southeast through the center of the proposed CPU area (Wilson Geosciences Inc. 2012; Kennedy and Tan, 2008). The RCFZ is considered the southern extension of the Newport-Inglewood structural zone originating at the Santa Monica Mountains and continuing south-southeast into the offshore at Huntington Beach, then returning onshore near La Jolla and Soledad Mountain. Major earthquakes occurring on the RCFZ, or other regional active faults located in the Southern California area, could subject the site to moderate to severe ground shaking.

Two fault strands, the Mission Bay and the Old Town, have been mapped in the project area as part of the RCFZ (Figure 2-5). These strands diverge as they trend into the project area from the north, with the Old Town fault trending southeasterly and the Mission Bay fault trending south to southwest. The *City of San Diego Seismic Safety Study, Geologic Hazards and Faults* (City of San Diego 2008a) Grid Tile 20 describes the Old Town and Mission Bay fault segments of the RCFZ as “potentially active, inactive, presumed inactive, or activity unknown.” Recent studies have identified active faults within the proposed CPU area (Rockwell, et al., 2012; Singleton et al., 2017) that will necessitate revision of the *City of San Diego Seismic Safety Study, Geologic Hazards and Faults maps* (City of San Diego 2008a). In addition, it is likely that these studies will result in the State Geologist expanding the Alquist-Priolo Earthquake Fault Zone to encompass sufficiently active and well defined faults in the proposed CPU area. Until more precise fault study zone maps can be published, site-specific fault investigation should be performed prior to proposing development within the RCFZ.

2.3.4.3 Groundwater

The proposed CPU area is not within a producing groundwater basin in this very near-coast location; historically, shallow groundwater is reported within the areas of artificial fill, young alluvium, and older alluvium at depths of less than approximately 25 feet.

2.3.5 Noise

Existing conditions related to the noise environment are included in Section 5.5.1 of the PEIR. The following background information provides additional context related to evaluating the noise environment.

2.3.5.1 Existing Noise Environment

Noise-sensitive receptors are land uses for which the associated primary activities, whether indoor or outdoor, are susceptible to disruption by loud noise events. The most common noise-sensitive uses include: residences, hospitals, nursing facilities, intermediate care facilities, educational facilities, libraries, museums, places of worship, child-care facilities, and certain types of passive recreational parks and open space. Existing noise sources in the proposed CPU area include motor vehicle, rail, and stationary sources. Stationary noise sources include industrial and commercial operations adjacent to I-5. Noise from these sources can conflict with existing noise-sensitive receptors.

2.3.5.2 Fundamentals of Noise

Sound propagation (i.e., the passage of sound from a noise source to a receiver) is influenced by several factors, including the distance from the source, geometric spreading, ground absorption, and atmospheric effects, as well as shielding by natural and/or manmade features. Noise is unwanted or disturbing sound.

The noise descriptors used in the environmental analysis (Section 5.5) are the decibel (dB), A-weighted decibel (dBA), 1-hour average-equivalent noise level (L_{eq}), and the community noise equivalent level (CNEL). L_{eq} is the average dBA sound level over a 1-hour period. A-weighting is a frequency correction that often correlates well with the subjective response of humans to noise. Similar to L_{eq} , the CNEL is a 24-hour average A-weighted decibel sound level. However, CNEL also incorporates a 5 dBA penalty to sound levels occurring between 7:00 p.m. and 10:00 p.m., and a 10 dBA penalty to sound levels occurring between 10:00 p.m. and 7:00 a.m. The additional 5 dBA and 10 dBA penalties during evening and nighttime hours, respectively, are intended to account for the added sensitivity of humans to noise during these time periods. For example, although a noise level of 60 dBA is typically considered acceptable during the day, during rest hours that same 60 dBA noise level may be considered a nuisance. CNEL values are typically used in land use planning to evaluate the compatibility of adjacent land uses.

The subsections below further describe elements and measures of noise.

a. Frequency and Hertz

A continuous sound can be described by its frequency (pitch) and its amplitude (loudness). Frequency relates to the number of pressure oscillations per second. Low-frequency sounds are low in pitch, like the low notes on a piano, whereas high-frequency sounds are high in pitch, like the high notes on a piano. Frequency is expressed in terms of oscillations, or cycles, per second. Cycles per second are commonly referred to as hertz (Hz). High frequencies are sometimes more conveniently expressed in units of kilohertz (kHz) or thousands of hertz. The extreme range of frequencies that can be heard by the healthiest human ear spans from 16 to 20 Hz on the low end to about 20,000 Hz (or 20 kHz) on the high end.

b. Sound Pressure Levels and Decibels

The amplitude of a sound determines its loudness. Loudness of sound increases and decreases with its amplitude. Sound pressure levels are described in units called the decibel. Decibels are measured on a logarithmic scale that quantifies sound intensity in a manner similar to the Richter scale used for earthquake magnitudes. Thus, a doubling of the energy of a noise source, such as doubling of traffic volume, would increase the noise level by 3 dB; a halving of the energy would result in a 3 dB decrease.

c. A-weighted Decibels

The human ear is not equally sensitive to all frequencies within the sound spectrum. Human hearing is limited not only in the range of audible frequencies but also in the way the ear perceives the sound in that range. In general, the healthy human ear is most sensitive to sounds between 1,000 Hz and 5,000 Hz, and it perceives a sound within that range as more intense than a sound of higher or lower frequency with the same magnitude. To approximate the frequency response of the human ear, a series of sound level adjustments is usually applied to the sound measured by a sound level meter.

The A-scale weighting network approximates the frequency response of the average healthy ear when listening to most ordinary sounds. When people make judgments of the relative loudness or annoyance of a sound, their judgments correlate well with the A-scale sound levels of those sounds. Noise levels for traffic noise reports are typically reported in terms of A-weighted decibels. All sound levels discussed in the PEIR analysis are A-weighted. Examples of typical noise levels for common indoor and outdoor activities are depicted in Table 2-3.

Under controlled conditions in an acoustics laboratory, the trained, healthy human ear is able to discern changes in sound levels of 1.5 dBA under certain conditions. Outside such controlled conditions, the average healthy ear can barely perceive changes of 3 dBA, a change of 5 dBA is readily perceptible, and an increase (decrease) of 10 dBA sounds twice (half) as loud.

Table 2-3 Typical Sound Levels in the Environment and Industry		
Common Outdoor Activities	Noise Level (dBA)	Common Indoor Activities
—	110	Rock band
Jet fly over at 300 m (1000 feet)	100	—
Gas lawn mower at 1 m (3 feet)	90	—
Diesel truck at 15 m (50 feet), at 80 km/hr (50 mph)	80	Food blender at 1 m (3 feet) Garbage disposal at 1 m (3 feet)
Noisy urban area, daytime Gas lawn mower at 30 m (100 feet)	70	Vacuum cleaner at 3 m (10 feet)
Commercial area Heavy traffic at 90 m (300 feet)	60	Normal speech at 1 m (3 feet)
Quiet urban daytime	50	Large business office Dishwasher next room
Quiet urban nighttime	40	Theater, large conference room (background)
Quiet suburban nighttime	30	Library
Quiet rural nighttime	20	Bedroom at night, concert hall (background)
—	10	Broadcast/recording studio
Lowest threshold of human hearing	0	Lowest threshold of human hearing

Source: Caltrans 2013

d. Noise Descriptors

The two noise metrics used in the analysis (Section 5.5) are the L_{eq} and the CNEL.

Equivalent Noise level (L_{eq})

The L_{eq} is also referred to as the time-average sound level. It is the equivalent steady state sound level, which in a stated period of time would contain the same acoustical energy as the time-varying sound level during the same time period. The period of time averaging may be specified; $L_{eq}(3)$ would be a 3-hour average. When no period of time is specified, a 1-hour average is assumed. The 1-hour A-weighted equivalent sound level is the energy average of the A-weighted sound level 1 during a 1-hour period. It is important to understand that noise of short duration, that is, times substantially less than the averaging period, is averaged into ambient noise during the period of interest. Thus, a loud noise lasting many seconds or a few minutes may have minimal effect on the measured sound level averaged over a 1-hour period.

Community Noise Equivalent Level (CNEL)

People are generally more sensitive and annoyed by noise occurring during the evening and nighttime hours. Thus, the CNEL was introduced. The CNEL scale represents a time-weighted 24-hour average noise level based on the A-weighted sound level. CNEL accounts for the increased noise sensitivity during the evening (7:00 p.m. to 10:00 p.m.) and nighttime hours (10:00 p.m. to 7:00 a.m.) by adding 5 dBA and 10 dBA, respectively, to the average sound levels occurring during these hours.

2.3.5.3 Vibration

Groundborne vibration consists of oscillatory waves that propagate from the source through the ground to adjacent structures. The frequency of a vibrating object describes how rapidly it is oscillating. The number of cycles per second of oscillation is the vibration frequency, which is described in terms of hertz. The normal frequency range of most groundborne vibration that can be felt generally ranges from a low frequency of less than 1 Hz to a high of about 200 Hz.

While people have varying sensitivities to vibrations at different frequencies, they generally are most sensitive to low-frequency vibration. Vibration in buildings caused by construction activities may be perceived as motion of building surfaces or rattling of windows, items on shelves, and pictures hanging on walls. Vibration of building components can also take the form of an audible low-frequency rumbling noise, which is referred to as groundborne noise.

Vibration energy spreads out as it travels through the ground, causing the vibration level to diminish with distance away from the source. High-frequency vibrations reduce much more rapidly than low frequencies, so that low frequencies tend to dominate the spectrum at large distances from the source. When vibration encounters a building the overall vibration level is typically reduced; however, under certain circumstances, vibration can be amplified due to structural resonances of the floors and walls.

Vibration levels are usually expressed as a single-number measure of vibration magnitude, in terms of velocity or acceleration, which describes the severity of the vibration without the frequency variable. The peak particle velocity (PPV) is defined as the maximum instantaneous positive or negative peak of the vibration signal, usually measured in inches per second. Since it is related to the stresses experienced by buildings, PPV is often used in monitoring of blasting vibration. Although PPV is appropriate for evaluating the potential of building damage, it is not suitable for evaluating human response since it takes some time for the human body to respond to vibrations.

2.3.6 Health and Safety

A hazardous material is any item or agent (biological, chemical, radiological, and/or physical) that has the potential to cause harm to humans, animals, or the environment, either by itself or through interaction with other factors. Hazardous materials are defined and regulated in the United States primarily by laws and regulations administered by the U.S. Environmental Protection Agency (USEPA), the U.S. Occupational Safety and Health Administration (OSHA), the U.S. Department of Transportation (DOT), and the U.S. Nuclear Regulatory Commission (NRC). Each agency has its own definition of a "hazardous material." Some common definitions are included below.

2.3.6.1 Hazardous Materials

Hazardous materials are substances with certain physical or chemical properties that could pose a substantial present or future hazard to human health or the environment when improperly handled, disposed, or otherwise managed. Title 22 of the CCR, Division 4.5, Chapter 11, Article 3 groups hazardous materials into the following four categories based on their properties: toxic (causes human health effects), ignitable (has the ability to burn), corrosive (causes severe burns or damage to materials),

and reactive (causes explosions or generates toxic gases). Hazardous materials are commonly used in commercial, agricultural, and industrial applications as well as in residential areas to a limited extent.

2.3.6.2 Hazardous Waste

A hazardous waste is any waste that may (1) cause, or significantly contribute to an increase in mortality or an increase in serious irreversible, or incapacitating reversible illness, or (2) pose a substantial present or potential hazard to human health or the environment, due to factors including, but not limited to, carcinogenicity, acute toxicity, chronic toxicity, bio-accumulative properties, or persistence in the environment, when improperly treated, stored, transported, or disposed of, or otherwise managed (California Health and Safety Code, Section 25141). Hazardous materials and wastes can result in public health hazards if improperly handled, released into the soil or groundwater, or released into the air through vapors, fumes, or dust.

2.3.6.3 Hazardous Materials Sites

Hazardous materials are used for a variety of purposes including service industries, various small businesses, medical uses, schools, and households. Many chemicals used in household cleaning, construction, dry cleaning, film processing, landscaping, and automotive maintenance and repair are considered hazardous. Businesses that handle/generate hazardous materials within the City are monitored by the USEPA. Small-quantity hazardous waste generators include facilities such as automotive repair, dry cleaners, and medical offices.

A search of federal, state, and local environmental regulatory agency databases was conducted in order to identify sites within the Old Town community that may have been impacted by hazardous materials or wastes (Appendix J). The search identified 17 documented release cases within Old Town, five of which are open and 12 of which were closed (Table 2-4). All of the identified sites are/were the site of either permitted leaking underground storage tanks (LUSTs) or a cleanup program with the exception of one military evaluation site. LUST systems pose a significant threat to groundwater quality in the United States.

**Table 2-4
Hazardous Materials Sites in Old Town**

Site	Address	Program/Site Type	Status
Thrifty Service Station/Arco	3860 Old Town Avenue	Permitted UST	Open
Old Town Shell	2290 Moore Street	Permitted UST	Open
Old Town Shell	2290 Moore Street	LUST Cleanup Site	Open
NISE-West/SPAWAR – Old Town Campus (formerly Air Force Plant #19)	4635 Pacific Highway	Military Cleanup Site	Open
San Diego Manufacturing Plant	South of Taylor Street and East of Pacific Highway	Military Evaluation	Open
Thrifty Service Station/Arco	3860 Old Town Avenue	Cleanup Program Site (5)	Closed 1991 (1) & 1993 (4)
Santa Fe Shopping Depot	2461 San Diego Avenue	Cleanup Program Site	Closed 1999
Davis/Garrad/Car Rental	1595 Pacific Highway	Cleanup Program Site	Closed 2010
Fremont Elementary School	2375 Congress Street	LUST Cleanup Site	Closed 2003
Caltrans District 11	4050 Taylor Street	LUST Cleanup Site	Closed 2001
Old Town State Park	4005 Taylor Street	LUST Cleanup Site	Closed 1988
San Diego Trust and Savings	4606 Pacific Hwy	LUST Cleanup Site	Closed 1992
Thrifty Service Station/Arco	3860 Old Town Avenue	LUST Cleanup Site	Closed 2012

Source: Ninyo & Moore 2012 (Appendix J)

Under the State Water Resources Control Board (SWRCB), the Site Cleanup Program (SCP) regulates and oversees the investigation and cleanup of “non-federally owned” sites where recent or historical unauthorized releases of pollutants to the environment, including soil, groundwater, surface water, and sediment, have occurred. Sites in the program are varied and include, but are not limited to, pesticide and fertilizer facilities, rail yards, ports, equipment supply facilities, metals facilities, industrial manufacturing and maintenance sites, dry cleaners, bulk transfer facilities, refineries, and some brownfields. These releases are generally not from strictly petroleum underground storage tanks (USTs). The types of pollutants encountered at the sites are plentiful and diverse and include solvents, pesticides, heavy metals, and fuel constituents to name a few.

Properties with open cases represent a moderate to high risk of encountering impact during potential future redevelopment. Closed release cases represent a low to moderate risk of encountering impact during potential future redevelopment. However, cases closed in the 1990s may not meet current standards and may require additional investigation and/or remediation prior to redevelopment.

The Old Town Burn Dump (aka Old Town Bridge Dump) is located within the northwest corner of the Old Town community, southeast of the I-5/I-8 intersection. This land disposal site had elevated concentrations of lead reported in burn materials collected from the dump in 2000 and has an “open-closed with monitoring” status as of 2013. This status means that the site has ceased accepting waste and was closed in accordance with applicable statutes, regulations, and local ordinances in effect at time of closure. A land disposal site in a post closure maintenance period as waste could have an adverse effect on the quality of the waters of the state; the site has waste discharge requirements.

2.3.6.4 Wildfire Hazards

Extended droughts characteristic of the City's Mediterranean climate result in large areas of dry vegetation, particularly in late summer and fall when Santa Ana winds blow in from the desert and dry out the vegetation. Potential wildfire risk zones within the proposed CPU area are areas that have steep slopes, limited precipitation, and plenty of available vegetation fuel. Old Town contains undeveloped land in the form of open space canyons and hillsides that are occupied by a variety of native/naturalized vegetation and nonnative plant communities. Due to the amount of natural open space, a high risk for wildfires exists.

Current City regulations require that brush management zones be established adjacent to development to reduce the risk from wildland fires. The purpose of such a program is to reduce the risk of wildfire while minimizing visual, biological, and erosion impacts to natural areas. In all the areas requiring brush management, a combination of two brush management zones occurs. Zone 1 consists of paving or ornamental plantings, which would be located within the development pad of each residential lot. Zone 2 involves the selective thinning and pruning of native vegetation and is considered impact neutral.

Areas of the highest risk for wildfires are located in the northwest corner of the proposed CPU area adjacent to the I-8/I-5 interchange near the San Diego River, to the north adjacent to the I-8/Morena Boulevard interchange, and including Presidio Park and Presidio Hills Golf Course, and the proposed CPU area located along the hillsides to the east. These areas are within the "Very High Fire Hazard Severity Zone and 300-foot Brush Buffer" shown on grid tile 18 of the City Fire-Rescue Department's Very High Fire Hazard Severity Zone Map.

2.3.6.5 Emergency Preparedness

The County of San Diego Office of Emergency Services (OES) coordinates the overall County response to disasters. OES is responsible for: notifying appropriate agencies when a disaster occurs; coordinating all responding agencies; ensuring that resources are available and mobilized; developing plans and procedures for response to and recovery from disasters; and developing and providing preparedness materials for the public.

The OES staffs the Operational Area Emergency Operations Center (EOC), a central facility that provides regional coordinated emergency response, and also acts as staff to the Unified Disaster Council (UDC), its governing body. The UDC, established through a joint powers agreement among all 18 incorporated cities and the County of San Diego, provides for coordination of plans and programs countywide to ensure protection of life and property.

In 2010, the County and 18 local jurisdictions, including the City of San Diego, adopted the Multi-Jurisdictional Hazard Mitigation Plan (MHMP). The MHMP is a countywide plan that identifies risks and ways to minimize damage by natural and manmade disasters. The plan is a comprehensive document that serves many purposes, including creating a decision tool for management, promoting compliance with state and federal program requirements, enhancing local policies for hazard mitigation capability, and providing interjurisdictional coordination.

The City of San Diego's disaster prevention and response activities are conducted in accordance with U.S. Department of Homeland Security Office of Domestic Preparedness requirements and incorporate

the functions of planning, training, exercising, and execution. The City's disaster preparedness efforts include oversight of the City's EOC, including being responsible for maintaining the EOC in a continued state of readiness, training City staff and outside agency representatives in their roles and responsibilities, and coordinating EOC operations when activated in response to an emergency or major event/incident.

2.3.6.6 Aircraft Hazards

The State of California requires that the San Diego County Regional Airport Authority Board, as the ALUC for San Diego County, prepares an ALUCP for each public-use airport and military air installation in San Diego County. An ALUCP contains policies and criteria that address compatibility between airports and future land uses that surround them by addressing noise, overflight, safety, and airspace protection concerns to minimize the public's exposure to excessive noise and safety hazards within the airport influence area (AIA) for each airport over a 20-year horizon. The City of San Diego implements the adopted ALUCPs with the Airport Land Use Compatibility Overlay Zone. The City submits ministerial and discretionary projects within the AIA for the SDIA to the ALUC for consistency determinations until the ALUC determines that the City's land use plans, zoning, and development regulations are consistent with the ALUCP for SDIA. SDIA is located within 1 mile southwest of the proposed CPU area; the project CPU area is located within the airport's AIA Review Area 2, which primarily addresses overflight and airspace protection. SDIA provides commercial air carrier services.

2.3.7 Hydrology and Water Quality

2.3.7.1 Drainage

The proposed CPU area is located south of the San Diego River, encompasses approximately 275 acres of land at the northwest end of the San Diego Mesa, and is adjacent to the current and former floodplain of the San Diego River. The community is bounded on the north by I-8, with the San Diego River located north of I-8, and the Mission Valley Community Plan Area also located to the north. The community is bounded on the south and west by I-5 and the Midway-Pacific Highway Corridor Community Plan area, and on the east by the Mission Hills neighborhood within the Uptown Community Plan area. Topographically, the proposed CPU area is quite varied and includes mesa and canyon lands in Presidio Park, which forms a substantial part of the northeastern edge of the neighborhood, steep hillsides along Juan Street, and relatively level land in the heart of Old Town San Diego State Historic Park. Elevation ranges from approximately 190 feet to just above sea level. The northern portion of the proposed CPU area drains to the San Diego River, and the southeastern portion of the proposed CPU area drains to San Diego Bay.

The San Diego Basin encompasses approximately 3,900 square miles, including most of San Diego County and portions of southwestern Riverside and Orange counties. The basin is broken down into Hydrologic Units (HUs) that cover the entire watershed of one or more major streams, Hydrologic Areas (HAs) for the watersheds of major tributaries and/or major groundwater basins within an HU, and Hydrologic Subareas (HSAs) for major subdivisions of hydrologic areas including both water-bearing and non-water-bearing formations. The basin is composed of 11 major HUs, 54 HAs, and 147 HSAs, extending from Laguna Beach southerly to the United States-Mexico border. Drainage from higher elevations in the east flows to the west, ultimately into the Pacific Ocean.

The northern portion of the Old Town community is located within the Mission San Diego Hydrologic Subarea 907.11 (Figure 2-6). With a land area of approximately 434 square miles, the San Diego River watershed is the second largest hydrologic unit located entirely in San Diego County. The watershed has approximately 520,000 residents and contains portions of the cities of San Diego, El Cajon, La Mesa, Poway, and Santee, and several unincorporated areas. Approximately 58.4 percent of the San Diego River watershed is currently undeveloped. Important hydrologic resources in the watershed include five water storage reservoirs, a large groundwater aquifer, extensive riparian habitat, coastal wetlands, and tide pools.

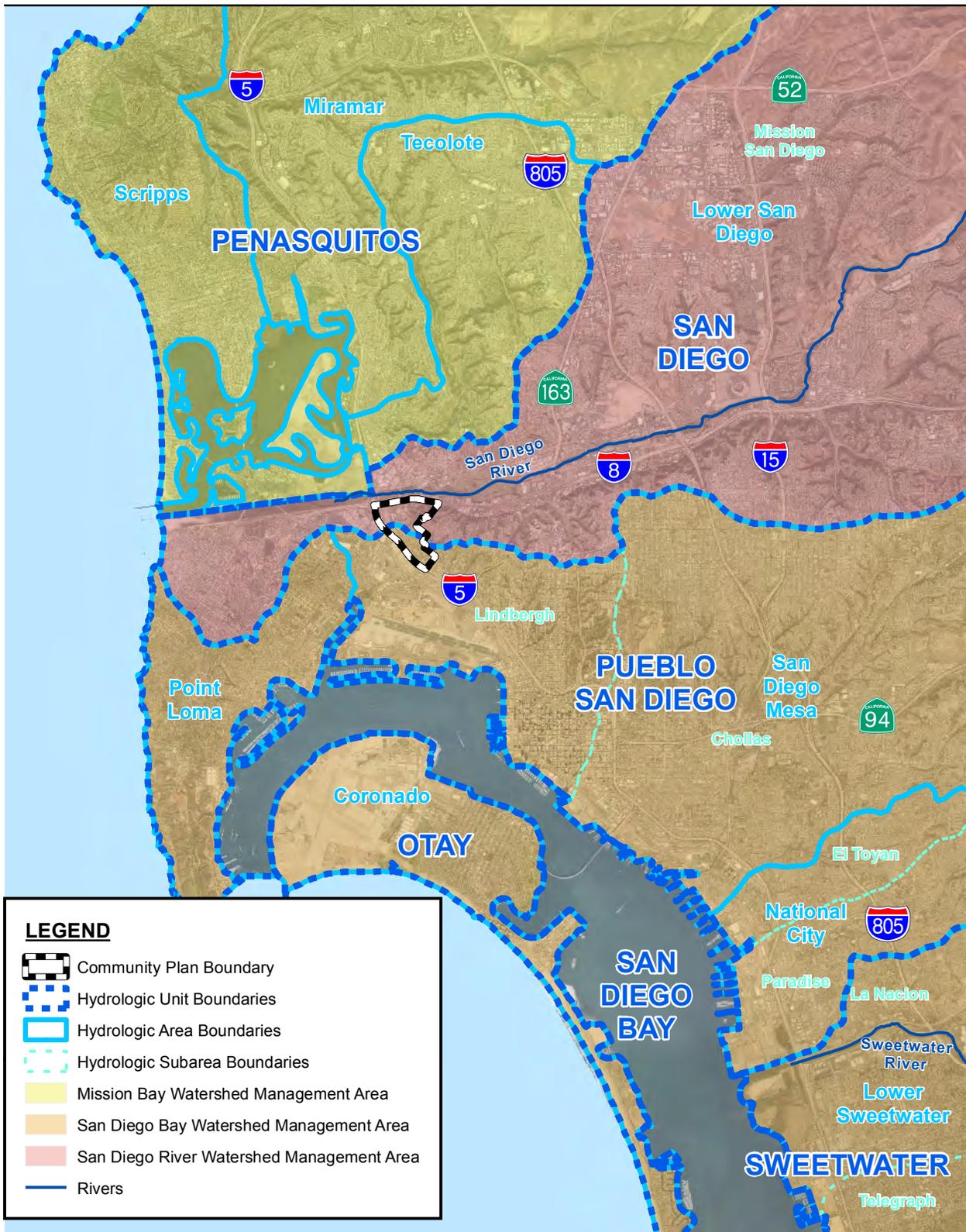
The southeastern portion of the Old Town community is located within the Lindbergh Hydrologic Subarea (908.21) of the Pueblo San Diego watershed. The Pueblo San Diego watershed is the smallest hydrologic unit in San Diego County, encompassing approximately 60 square miles of predominantly urban landscape in the cities of San Diego, La Mesa, Lemon Grove, and National City. The watershed contains the smallest proportion of unincorporated area (0.3 percent) of the HUs within the county. The population of the Pueblo San Diego watershed is approximately 500,000 residents, making it the county's most densely populated watershed. Approximately 75 percent of the watershed is developed. Due to the high level of existing urbanization in the watershed, only small amounts of additional land are projected for development over the next 15 years (Project Clean Water 2016).

2.3.7.2 Water Quality

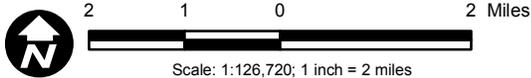
The Water Quality Control Plan for the San Diego Basin (Basin Plan) prepared by the San Diego Regional Water Quality Control Board (RWQCB) (1994, with amendments effective on or before May 17, 2016) designates beneficial uses for water bodies in the San Diego region and establishes water quality objectives and implementation plans to protect those beneficial uses.

San Diego Bay and the San Diego River, as major receiving water bodies, are considered impaired for specific pollutants. These include benthic community effects, sediment toxicity, copper, mercury, polychlorinated biphenyls, zinc, indicator bacteria, chlordane, lindane/hexachlorocyclohexane, and polycyclic aromatic hydrocarbons for San Diego Bay; *Enterococcus*, fecal coliform (lower 6 miles), low dissolved oxygen, manganese, nitrogen, phosphorus, total dissolved solids (TDS), and toxicity for the San Diego River; and *Enterococcus*, fecal coliform and total coliform for the Pacific Ocean shoreline and the San Diego River outlet (RWQCB 2016). With the majority of existing development constructed prior to the adoption of storm water regulations requiring water quality protection through the treatment of storm water runoff, existing best management practices (BMPs) for the protection of storm water runoff within the proposed CPU area are limited, and therefore, contribute further to the existing impairments for which a receiving water body is listed.

Urban runoff is surface water runoff generated from developed or disturbed land associated with urbanization. The increase in impervious surfaces and fewer opportunities for infiltration within the landscape increase storm flows and provide a source for sediment and other pollutants to enter receiving waters. Urban runoff is a major component of urban flooding and is a particular problem for management of watersheds. Urban runoff is the largest pollution source of Southern California's coastal beaches and nearshore waters. Urban runoff control programs typically focus on managing the effect that new impervious surfaces have on stream channels, but may also provide remediation of existing problems.



Source: SANDAG 2014; City of San Diego 2017; California Interagency Watershed Mapping Committee 2004



**Figure 2-6
Watersheds**

a. San Diego River

The proposed CPU area lies adjacent to the southern edge of the San Diego River. The San Diego River generally flows to the west from upstream areas and discharges into the Pacific Ocean just north of the Ocean Beach community. The San Diego River has been listed as an “impaired” body under Section 303(d) of the Clean Water Act due to Enterococcus, fecal coliform, low dissolved oxygen, manganese, nitrogen, phosphorus, TDS, and toxicity. Major impacts to this watershed include surface water quality degradation, habitat degradation and loss, sediment, invasive species, eutrophication, and flooding. Sources of impacts include urban runoff, agricultural runoff, mining operations, sewage spills, and sand mining.

b. San Diego Bay

The southeastern portion of the proposed CPU drains to San Diego Bay. The beneficial uses of the inland surface waters in the Pueblo San Diego watershed include contact (potential use activities involving a significant risk of ingestion of water, including wading by children and swimming) and non-contact (aquatic recreation pursuits not involving a significant risk of water ingestion, including fishing and limited body contact incidental to shoreline activity) recreation, warm freshwater habitat, and wildlife habitat. The San Diego Bay receiving waters support an extensive array of beneficial uses (RWQCB 2016).

The existing coastal beneficial uses identified for San Diego Bay include industrial service supply; navigation; contact water recreation; non-contact water recreation; commercial and sport fishing; preservation of biological habitats of special significance; estuarine habitat; wildlife habitat; rare, threatened, or endangered species; marine habitat; migration of aquatic organisms; spawning; reproduction; and/or early development; and shellfish harvesting (RWQCB 2016).

The southeastern portion of the proposed Old Town CPU area lies within the Pueblo San Diego hydrologic unit, which is one of three hydrologic units that make up the San Diego Bay watershed. The Pueblo San Diego hydrologic unit drainage consists of a group of relatively small local creeks and pipe conveyances, many of which are concrete-lined and drain directly into San Diego Bay. The creeks in the watershed are highly impacted by urban runoff, and are listed as 303(d)-impaired water bodies for various trace metals parameters and aquatic toxicity. Several sites in San Diego Bay that are impacted by runoff from the Pueblo San Diego hydrologic unit have been identified as hot spots by California’s Bay Protection Toxic Cleanup Program (Project Clean Water 2016).

2.3.7.3 Groundwater

Groundwater within the San Diego Bay watershed was determined to have a beneficial use for municipal and domestic supply, as well as industrial process and service supply. Groundwater within the Mission San Diego subarea of the Lower San Diego area of the San Diego HU has a potential beneficial use for municipal and domestic supply and existing beneficial uses for agricultural supply, industrial service supply, and industrial process supply (RWQCB 2016).

2.3.8 Visual Effects and Neighborhood Character

2.3.8.1 Existing Context and Urban Form

a. Building Design and Historic Character

The proposed CPU area is located on the sloping hillsides and mesa just above the San Diego River. The area is predominantly developed, but features a few small concentrations of natural vegetation in steep canyons amid residential areas, open space, and parks. The Old Town community has undergone spurts of development since the late 1700s, and now contains the Old Town San Diego State Historic Park, residential neighborhoods, the commercial core with commercial use primarily along San Diego Avenue, Presidio Park, El Campo Santos, Presidio Hills Golf Course, Old Town Transit Center, and Caltrans District 11 offices.

By the 1870s, Old Town was made up of shaped subdivision blocks that radiated out in all directions from the present-day Old Town Plaza. The blocks measured 300 square feet with 50-foot-wide access streets. At that time, Old Town included approximately 174 individual square blocks.

Residential and commercial development in the Old Town area continued to expand into the 20th century. By 1885, Old Town was connected to the transcontinental railroad which led to increased commercial, residential, and institutional development in the area. The pace of development during this time was moderate, with single- and multi-family residences being constructed largely along Harney and Congress Streets. Light commercial development occurred, but it remained scattered along Congress Street and San Diego Avenue. As use of the automobile increased, Old Town became a popular tourist destination. This led to the development of commercial buildings, including gift shops, restaurants, and cafes in the 1910s-1930s, and early efforts to preserve, restore, and commemorate Old Town's history and historical resources. For example, development of Presidio Park, the Serra Museum, and Presidio Hills Golf Course were completed between 1925 and 1932 and donated to the City by George Marston. During the 1930s, some single family residential development occurred in Old Town, and in the 1940s, war-related housing and industrial development occurred in the community. By the late 1950s, Old Town began a renewed effort to protect its historic resources. Many historic buildings in the area were restored, demolished buildings were reconstructed, and others were relocated to avoid demolition. In 1968, a portion of Old Town became a California State Park, and in 1971 the area was added to the NRHP as the Old Town San Diego Historic District. To preserve the character of the area, new in-fill construction was required to be constructed in general conformance with the structures that existed in Old Town prior to 1871. Pockets of residential tract homes were constructed within existing housing developments in Old Town to accommodate the population increase in San Diego.

Presently, the Old Town San Diego State Historic Park and the San Diego Avenue commercial corridor together form the primary activity center within the community. The Old Town Transit Center in the northwestern corner of the community provides transit access to and visitor parking for Old Town and provides regional transit access and connections for transit riders. The portion of the community north of Taylor Street predominantly consists of institutional uses operated by Caltrans and the U.S. Navy, as well as commercial and hotel uses. The southern half of the community consists of a mix of hotel, office, and residential uses.

b. Built Form and Development

The proposed CPU area's physical form and architectural character is a product of its long history of development. Most buildings within the area were constructed to be compatible with the historical context of the proposed CPU area as required by architectural standards in place since the late 1960s, with historical structures and structures reflecting architectural styles from the 1880s through 1960s scattered throughout the community. The Old Town San Diego Historic District and Heritage Park contain historic buildings, and Presidio Park and open space along canyons provide open space in the area. Multi-family and single-family housing is present within central and southern portions of the Old Town community. Full block hotel and office developments are also located in the central and southern portions of the community and north of Taylor Street. The Caltrans District 11 office building and a hotel along Taylor Street are the two most recent buildings.

c. Views and Vistas

Due to its relatively flat, low-lying topography, most of the proposed CPU area does not have prominent view corridors with the exception of hillside residential areas. Presidio Park is located on more hilly topography and provides views of San Diego from Pacific Beach to San Diego Bay. The proposed CPU area does not contain any designated scenic vistas.

2.3.9 Air Quality

The proposed CPU planning area is located within the San Diego Air Basin (SDAB) of the San Diego Air Pollution Control District (APCD), between 1.3 miles and 2.3 miles northeast of San Diego Bay. Air quality conditions and local climate are described in this section.

2.3.9.1 Climate

The San Diego region, including the Old Town community, is influenced by proximity to the Pacific Ocean and semi-permanent high-pressure systems that result in warm, dry summers and mild, occasionally wet winters. The proposed CPU area is subject to frequent offshore breezes. The mean annual temperature at SDIA, recorded near Downtown San Diego and Old Town, is 64 degrees Fahrenheit (°F). The average annual precipitation for the area is approximately 10 inches, falling primarily from November to April. Winter mean low temperatures average 49°F, and summer mean high temperatures average 74°F based on the measurements taken at SDIA.

The dominant meteorological feature affecting the region is the Pacific High Pressure Zone, which produces the prevailing westerly to northwesterly winds. These winds tend to blow pollutants away from the coast toward the inland areas. Consequently, air quality near the coast is generally better than what occurs at the base of the coastal mountain range.

Fluctuations in the strength and pattern of winds from the Pacific High Pressure Zone interacting with the daily local cycle produce periodic temperature inversions that influence the dispersal or containment of air pollutants in the SDAB. Beneath the inversion layer pollutants become "trapped" as their ability to disperse diminishes. The mixing depth is the area under the inversion layer. Generally, the morning

inversion layer is lower than the afternoon inversion layer. The greater the change between the morning and afternoon mixing depths, the greater the ability of the atmosphere to disperse pollutants.

Throughout the year, the height of the temperature inversion in the afternoon varies between approximately 1,500 and 2,500 feet above mean sea level (MSL). In winter, the morning inversion layer is about 800 feet above MSL. In summer, the morning inversion layer is about 1,100 feet above MSL. Therefore, air quality generally tends to be better in the winter than in the summer.

The prevailing westerly wind pattern is sometimes interrupted by regional “Santa Ana” conditions. A Santa Ana occurs when a strong high pressure develops over the Nevada to Utah area and overcomes the prevailing westerly coastal winds, sending strong, steady, hot, dry northeasterly winds over the mountains and out to sea.

Strong Santa Ana winds tend to blow pollutants out over the ocean, producing clear days. However, at the onset or during breakdown of these conditions or if the Santa Ana is weak, local air quality may be adversely affected. In these cases, emissions from the South Coast Air Basin to the north are blown out over the ocean, and low pressure over Baja California draws this pollutant-laden air mass southward. As the high pressure weakens, prevailing northwesterly winds reassert themselves and send this cloud of contamination ashore in the SDAB. When this event does occur, the combination of transported and locally produced contaminants produce the worst air quality measurements recorded in the basin.

2.3.9.2 Existing Air Quality

Air quality at a particular location is a function of the kinds, amounts, and dispersal rates of pollutants being emitted into the air locally and throughout the basin. The major factors affecting pollutant dispersion are wind speed and direction, the vertical dispersion of pollutants (which is affected by inversions), and the local topography.

Air quality is commonly expressed as the number of days in which air pollution levels exceed state standards set by the California Air Resources Board (CARB) or federal standards set by the USEPA. The San Diego APCD maintains 11 air quality monitoring stations located throughout the greater San Diego metropolitan region. Air pollutant concentrations and meteorological information are continuously recorded at these 11 stations. Measurements are then used by scientists to help forecast daily air pollution levels.

The air quality monitoring station nearest the proposed CPU area is the San Diego–Beardsley Street monitoring station that is located at 1110 Beardsley Street, which monitors the following pollutants: ozone, carbon monoxide (CO), nitrogen dioxide (NO₂), particulate matter less than 10 microns in diameter (PM₁₀), and particulate matter less than 2.5 microns in diameter (PM_{2.5}). The sulfur dioxide (SO₂) monitors were decommissioned in 2012, as this pollutant is less of a concern in the SDAB. Table 2-5 provides a summary of measurements of ozone, CO, SO₂, NO₂, PM₁₀, and PM_{2.5} collected at the Beardsley Street monitoring station for the years 2012 through 2016.

**Table 2-5
Summary of Air Quality Measurements Recorded at the
San Diego–1110 Beardsley Street Monitoring Station**

Pollutant/Standard	2012	2013	2014	2015	2016
Ozone					
Days State 1-hour Standard Exceeded (0.09 ppm)	0	0	0	0	0
Days Federal 8-hour Standard Exceeded (0.075 ppm) ^a	0	0	0	0	0
Days State 8-hour Standard Exceeded (0.07 ppm)	0	0	2	0	0
Max. 1-hr (ppm)	0.071	0.063	0.093	0.089	0.072
Max. 8-hr (ppm)	0.065	0.053	0.072	0.067	0.061
Carbon Monoxide					
Days Federal 8-hour Standard Exceeded (35 ppm)	0	NA	NA	NA	NA
Days State 8-hour Standard Exceeded (20 ppm)	0	NA	NA	NA	NA
Max. 1-hr (ppm)	2.6	3.0	2.7	2.6	2.2
Max. 8-hr (ppm)	1.81	NA	NA	NA	NA
Nitrogen Dioxide					
Days Federal 1-hour Standard Exceeded (0.10 ppm)	0	0	0	0	0
Days State 1-hour Standard Exceeded (0.18 ppm)	0	0	0	0	0
Max 1-hr (ppm)	0.065	0.072	0.075	0.062	0.073
Annual Average (ppm)	0.013	0.014	0.013	0.014	NA
Sulfur Dioxide^b					
Days State 24-hour Standard Exceeded (0.04 ppm)	NA	NA	NA	NA	NA
Max 24-hr (ppm)	NA	NA	NA	NA	NA
Annual Average (ppm)	NA	NA	NA	NA	NA
PM₁₀					
Days State 24-hour Standard Exceeded (50 µg/m ³)	0	1	0	1	1
Days Federal 24-hour Standard Exceeded (150 µg/m ³)	0	0	0	0	0
Max. Daily—Federal (µg/m ³)	45	90	40.0	53.0	49.0
Max. Daily—State (µg/m ³)	47	92	41.0	54.0	51.0
Federal Annual Average (µg/m ³)	21.8	24.9	23.3	23.0	21.9
State Annual Average (µg/m ³)	22.2	25.4	23.8	23.2	NA
PM_{2.5}					
Days Federal 24-hour Standard Exceeded (35 µg/m ³)	1	1	1	0	0
Max. Daily—Federal (µg/m ³)	39.8	37.4	36.7	33.4	34.4
Max. Daily—State (µg/m ³)	39.8	37.4	37.2	44.9	34.4
Federal Annual Average (µg/m ³)	11.0	10.3	10.1	9.3	NA
State Annual Average (µg/m ³)	NA	10.4	10.2	10.2	NA

Source: CARB 2017; SDAPCD 2015a; 2015b; 2016a

NA = not available; ppm = parts per million; µg/m³ = micrograms per cubic meter

^a On October 1, 2015, the national 8-hour ozone primary and secondary standards were lowered from 0.075 to 0.070 ppm.

^b Eight-hour carbon monoxide averages are available at San Diego-1110 Beardsley Street station between 2005 and 2012

^c The SO₂ monitor was decommissioned on June 30, 2011.

2.3.9.3 Regional Background Toxic Air Pollutants

The San Diego APCD samples for toxic air contaminants at the El Cajon and Chula Vista monitoring stations only. Excluding diesel particulate emissions, data from these stations indicate that the background cancer risk in 2008 due to air toxics was 135 in one million in Chula Vista and 150 in one million in El Cajon. There is no current methodology for directly measuring diesel particulate

concentrations. Based on CARB estimates, diesel particulate emissions could add an additional 420 in one million to the ambient cancer risk levels in San Diego County.

Thus, the combined background ambient cancer risk due to air toxics in the urbanized areas of San Diego County could potentially range from around 555 to 570 in one million. As such, diesel particulate matter is the air toxic of primary concern on a regional basis.

2.3.10 Greenhouse Gas Emissions

The proposed Old Town CPU area is currently a source of anthropogenic greenhouse gas (GHG), with emissions generated by vehicular traffic and by the energy use, water use, and solid waste management practices of existing development.

2.3.10.1 State and Regional GHG Inventories

a. CARB Inventory

CARB performs statewide GHG inventories. The inventory is divided into nine broad sectors of economic activity: agriculture, commercial, electricity generation, forestry, high global warming potential (GWP) emitters, industrial, recycling and waste, residential, and transportation. Emissions are quantified in million metric tons of CO₂ equivalent (MMT CO₂E). Table 2-6 shows the estimated statewide GHG emissions for the years 1990, 2008, and 2012.

Sector	1990 ¹ Emissions in MMT CO ₂ E (% total) ²	2008 ³ Emissions in MMT CO ₂ E (% total) ²	2012 Emissions in MMT CO ₂ E (% total) ²
Sources			
Agriculture	23.4 (5%)	37.99 (8%)	37.86 (8%)
Commercial	14.4 (3%)	13.37 (3%)	14.20 (3%)
Electricity Generation	110.6 (26%)	120.15 (25%)	95.09 (21%)
High global warming potential	--	12.87 (3%)	18.41 (4%)
Industrial	103.0 (24%)	87.54 (18%)	89.16 (19%)
Recycling and Waste	--	8.09 (2%)	8.49 (2%)
Residential	29.7 (7%)	29.07 (6%)	28.09 (6%)
Transportation	150.7 (35%)	178.02 (37%)	167.38 (36%)
Forestry (Net CO ₂ flux)	-6.69	--	--
Not Specified	1.27	--	--
TOTAL	426.6	487.10	458.68

Source: California Energy Commission (CEC) 2014; CARB 2007; 2014

¹ 1990 data was retrieved from the CARB 2007 source.

² Percentages may not total 100 due to rounding.

³ 2008 and 2012 data were retrieved from the CARB 2014 source.

⁴ Reported emissions for key sectors. The inventory totals for 2008 and 2012 did not include Forestry or Not Specified sources.

As shown in Table 2-6, statewide GHG source emissions totaled approximately 427 MMT CO₂E in 1990, 487 MMT CO₂E in 2008, and 459 MMT CO₂E in 2012. Many factors affect year-to-year changes in GHG

emissions, including economic activity, demographic influences, environmental conditions such as drought, and the impact of regulatory efforts to control GHG emissions. CARB has adopted multiple GHG emission reduction measures, and most of the reductions since 2008 have been driven by economic factors (recession), previous energy-efficiency actions, and the Renewables Portfolio Standard (RPS). Transportation-related emissions consistently contribute the most GHG emissions, followed by electricity generation and industrial emissions. The forestry sector is unique because it not only includes emissions associated with harvest, fire, and land use conversion (sources), but also includes removals of atmospheric carbon dioxide (CO₂; sinks) by photosynthesis, which is then bound (sequestered) in plant tissues.

b. City of San Diego CAP Inventory

A San Diego regional emissions inventory prepared as part of the City of San Diego's Climate Action Plan (CAP) reported GHG emissions totaling approximately 13 MMT CO₂E in 2010. Similar to the statewide emissions, transportation-related GHG emissions contributed the most Citywide, followed by emissions associated with energy use.

2.3.11 Public Services and Facilities

The Old Town community is served by a variety of public facilities and services, including utilities such as water, sewer, and solid waste management. The infrastructure needs for these services are managed through the City's Capital Improvements Projects (CIP) program. The City conducts a biannual review of public services, facilities, and utilities implementation in conjunction with the budget/CIP review cycle. As part of this review process, the City assesses the need for new or expanded services and public facilities to provide appropriate services and infrastructure commensurate with population increase.

Existing public services and facilities, including parks, recreation centers, libraries, schools, fire, emergency medical, and police, serve the residents and businesses within the Old Town and surrounding communities. The following provides a discussion of the existing and planned public services and facilities that are, or will be, available to the proposed CPU area.

a. Police Protection

Police protection for the Old Town community is provided by Beat 625 of the Western Division of the San Diego Police Department (SDPD). Western Division is located at 5215 Gaines Street within the Linda Vista community and is currently staffed with 81 sworn police officers and two civilian personnel (Appendix K). This division serves a population of 129,709 people and encompasses 22.7 square miles. The Western Division serves the neighborhoods of Linda Vista, Morena, Mission Valley West, University Heights, North Park, Burlingame, Hillcrest, Midtown, Mission Hills, Midway District, Loma Portal, Point Loma Heights, Ocean Beach, Sunset Cliffs, Roseville/Fleet Ridge, La Playa and Wooded Area. (Appendix K).

The SDPD does not staff individual stations based on population ratios. The goal Citywide is to maintain a ratio of 1.48 officers per 1,000 population. The SPDP is currently reaching a staffing ratio of 1.3 sworn officers per 1,000 residents based on a 2016 estimated residential population of 1,391,676 (Appendix K). The SDPD currently uses the following five-level priority dispatch system: Priority E (Emergency), One,

Two, Three, and Four. Priority E and Priority One calls involve serious crimes in progress or those with a potential for injury. Priority Two calls include vandalism, disturbances, and property crimes. Priority Three includes calls after a crime has been committed, such as cold burglaries and loud music. Priority Four calls include parking complaints or lost and found reports.

The average response times for the Western Division for 2016 were 6.2 minutes for emergency calls, 13.2 minutes for Priority 1 calls, 36.4 minutes for Priority 2 calls, 113.5 minutes for Priority 3 calls, and 106 minutes for Priority 4 calls (Appendix K). The SDPD's Citywide response time goals are 7 minutes for emergency calls, 12 minutes for Priority 1 calls, 25 minutes for Priority 2 calls, 60 minutes for Priority 3 calls, and 70 minutes for Priority 4 calls (Appendix K).

b. Parks and Recreation

The Old Town community's recreation needs are currently served by the Presidio Community Park, Presidio Recreation Center, and the El Campo Santo ~~Pocket Park~~Cemetery.

- Presidio Community Park consists of a softball field, picnic area, parking lot, basketball court, passive lawn areas, and the Presidio Recreation Center. Presidio Community Park provides recreational programs and activities for populations of diverse ages offered by the Park and Recreation Department. Youth and adult sports leagues also use the softball field and the recreation center.
- El Campo Santo ~~Pocket Park~~Cemetery is the Old Spanish Cemetery laid out by the Catholic Parish of the Immaculate Conception in 1840. This ~~pocket park~~cemetery contains benches for relaxation and interpretive signage that helps residents and visitors to understand its importance to the community's history as a burial site representative of the Mexican and American period between 1840 and 1880.

Three resource-based parks that are major visitor-serving parks for the community and the San Diego region and contain important historic landmarks are within Old Town: Presidio Park, the County of San Diego's Heritage Park, and the Old Town San Diego State Historic Park.

- Presidio Park, the site of the first European settlements in 1769, was built by George Marston in 1925 and donated to the City in 1929. The park includes Junípero Serra Museum, picnic areas, small venue space, restrooms, monuments, and open lawn space for active and passive recreation.
- Heritage Park was established by San Diego County in 1969 along Juan Street for the preservation and interpretation of 1880s and 1890s Victorian architecture from various downtown neighborhoods in San Diego that were being threatened with demolition. Between 1969 and 1978, seven Victorian buildings were relocated to the Park.
- Old Town San Diego State Historic Park was established in 1968, commemorating the early days of the town of San Diego and including many historic buildings from the period 1820 to 1870. Five original adobes are part of the complex, which includes shops, restaurants and museums. Other historic ~~buildings~~reconstructions include a schoolhouse, a blacksmith shop, San Diego's first

newspaper office, a cigar and pipe store, houses and gardens, and a stable with a carriage collection. There are also stores, and local artisans demonstrating their craft.

The San Diego River Park is proposed north of the proposed CPU area on the north side of I-8, along both sides of the San Diego River. The San Diego River Park is a planned 17.5-mile section of the river within the boundaries of the City of San Diego extending from the Pacific Ocean to the City limits shared with the City of Santee. A string of parks along the river will be linked by open space, pathways, and green corridors as a multi-layered system that will offer regional recreational, environmental, and habitat benefits. The planning area for the San Diego River Park contains two major parks, Mission Bay Park and Mission Trails Regional Park, which can be linked by the San Diego River Park. Adjacent canyons and open spaces including Tecolote Canyon, Murphy Canyon, Murray Canyon, Ruffin Canyon, Alvarado Canyon and Navajo Canyon are all areas that offer significant potential to connect between the canyons and the San Diego River.

The San Diego River Trail, approximately 7 miles in length, is an existing section of paved path within the San Diego River Park located between Voltaire Street in Ocean Beach and Qualcomm Way at Camino De La Reina in Mission Valley. The San Diego River Trail will be completed in segments as funding and right-of-way becomes available, as a collaborative effort between the San Diego Association of Governments (SANDAG), the San Diego River Conservancy, and the cities of San Diego and Santee.

c. Fire/Life Safety Protection

The San Diego Fire-Rescue Department (SDFD) provides emergency/rescue services, hazard prevention, and safety education to ensure the protection of life, property, and the environment, including education about vegetation management to protect properties from wildfires in canyon areas. The City provides fire services through geographic service areas that serve multiple neighborhoods, and therefore, need to be located on major roads accessible to neighborhoods, and adjacent to freeways when practicable.

Fire Station No. 8, located at 3974 Goldfinch Street within the Uptown community, and Fire Station No. 20, located at 3305 Kemper Street within the Midway-Pacific Highway community (see Figure 4.11-1), provide primary fire protection and advanced life support services to the Old Town community and the surrounding area. All SDFD engines and trucks are full advanced life support units and are equipped and capable of managing medical emergencies. No new fire stations are planned for the proposed CPU area; however, expansion plans for Fire Station 8 include new quarters and parking for fire staff that will occupy the Mission Hills Library site, once the library is relocated. A new station for Fire Station 8 will eventually be located at the intersection of Washington Street and Goldfinch Street, pending land acquisition and funding. This station will be approximately 12,500 square feet with three bays to accommodate one engine, one truck, a paramedic ambulance, and 10 personnel. A new station for Fire Station 20 of the same size and specifications is also programmed pending land acquisition and available funding.

Emergency medical services are also provided to the Old Town community and throughout the City through a public/private partnership between the City's Emergency Medical Services (EMS) and Rural Metro Corporation, which provides additional personnel and some ambulances. EMS has ambulances, paramedics, and emergency medical technicians (EMTs) who respond to emergency calls. Calls are prioritized from Level 1 (most serious) to Level 4 (non-emergency).

d. Libraries

Library services are provided by the San Diego Public Library (SDPL) and its branch locations. Per the City's *Guiding Principles for Library Facilities* (July 2001), the minimum branch library size should be 15,000 square feet. The Library System Improvements Program for the SDPL originally included a new Central Library (completed in 2014) and 23 branch libraries. Nine libraries have been completed with either new construction or expansion. Mission Hills/Hillcrest is under construction and San Ysidro is anticipated to start construction soon. Others are in planning and design phases or on hold due to lack of funding.

The Old Town community is served by two branch locations of the SDPL system: Mission Hills Branch Library located in the Uptown community and the Point Loma/Hervey Library located in the Peninsula community. Additionally, the Central Library in Downtown is accessible from Old Town via the trolley. A new 25,000-square-foot facility will replace the current 3,850-square-foot Mission Hills Branch Library located at 925 West Washington Street and built in 1961 prior to the minimum standard of 15,000 square feet for branch libraries. The new branch library site, which is under construction, will be located at the southwest corner of Washington and Front streets and is anticipated to be completed by 2019.

e. Schools

The Old Town community is located within the jurisdiction of the San Diego Unified School District (SDUSD). Students from Old Town San Diego have the option to attend SDUSD Kindergarten through 12th grade schools in Midway-Pacific Highway, Peninsula, Uptown, and Downtown; no elementary, middle, or high schools are currently located within the Old Town community. Charter and private schools in Old Town and neighboring communities also help serve the community, including iHigh Virtual Academy, a public charter high school located at the Ballard Parent Center site. The Ballard Parent Center is a Parent Outreach and Education Department located in the former Fremont Elementary School building which closed in 2001. In 2014, the San Diego Unified School District issued a request for proposal for Joint Occupancy Development of the Ballard Parent Center.

In 2012, voters approved funding of two bond measures, Propositions S and Z, to fund repairs, and renovate and revitalize schools within the SDUSD. Bond projects build off improvements that were started with Prop MM funding and include classroom technology, safety and security upgrades, Americans with Disabilities Act (ADA) upgrades, new/renovated facilities, temporary classrooms replaced by permanent classrooms, air conditioning, upgrades to ADA improvements in athletic facilities, turf fields, and other capital improvements at traditional and charter schools throughout the district.

All development projects within the City are required to pay school fees in accordance with the requirements of the SDUSD, and as mandated by state law, to accommodate the needs of public schools serving existing and future students.

2.3.12 Public Utilities

Public utilities include public water, energy, sewer, storm water, and solid waste collection and recycling that are available to serve the proposed CPU area. A description of the existing conditions of each of

these public utilities is provided below. Potential impacts to public utilities from implementation of the proposed CPU are discussed in Section 5.12.

a. Water Supply

City of San Diego

The City of San Diego Public Utilities Department (PUD) provides water service to more than 1.3 million residents over 404 square miles of developed land in the south-central portion of San Diego County, including the proposed CPU area. In the past, the City relied on water from the Metropolitan Water District of Southern California (MWD) for 95 percent of its supply. During years of drought, this made the City extremely vulnerable to water supply shortages, such as in 1991 when a drought forced MWD to cut its deliveries to San Diego by 30 percent. As a result, the San Diego County Water Authority (SDCWA) has implemented a strategy to aggressively diversify its water supply portfolio through the introduction of new local and imported water supplies so that by 2014, MWD deliveries accounted for around 49 percent of the total supply with new sources and conservation efforts accounting for the remaining 51 percent.

SDCWA secured new imported water supplies through a long-term (45- to 75-year) water conservation and transfer agreement with the Imperial Irrigation District, which provided approximately 100,000 acre-feet of water from the Colorado River in 2014 and will double that amount by 2021. SDCWA has a separate 110-year agreement to receive approximately 80,000 acre-feet of water from the Colorado River by lining parts of the Coachella and All-American canals.

SDCWA is also in the final stages of executing a \$3.1 billion CIP that involves 50 different projects, including new reservoirs, pipelines, pumping stations, a new regional water treatment facility, and a project to raise the San Vicente Dam to allow for additional local storage. Other strategies involve collaboration with SDCWA's 24 local member retail agencies, and include promoting water conservation through water use efficiency programs, and the introduction of supplies from groundwater, recycled water, and seawater desalination. Additional information about SDCWA water supply diversification projects is provided in SDCWA's 2015 Urban Water Management Plan (UWMP).

The City PUD receives the majority of its water supply from MWD through SDCWA. Historic imported water deliveries from SDCWA to the PUD and local surface water, conservation savings, and recycled water deliveries are shown in Table 2-7.

Fiscal Year	Imported Water (acre-feet)	Local Surface Water (acre-feet)	Conservation ¹ (acre-feet)	Recycled Water (acre-feet)	Groundwater (acre-feet)	Total ² (acre-feet)
1990	233,158	22,500	--	--	--	255,658
1995	162,404	59,204	8,914	--	--	230,342
2000	207,874	39,098	17,410	3,250	--	267,632
2005	204,144	26,584	29,410	4,294	--	264,432
2010	188,337	13,117	34,317	12,173	500	248,444

¹ Conserved water is from savings and is not a direct supply.

² Total includes water supplied and conserved.

Source: City of San Diego 2017; Appendix L

The City's water system consists primarily of nine surface water reservoirs with over 408,000 acre-feet of storage capacity, three water treatment plants, 31 treated water storage facilities, and more than 3,213 miles of transmission and distribution lines. The local surface raw water storage facilities are connected directly or indirectly to the City's water treatment operations: Otay Water Treatment Plant, Alvarado Water Treatment Plant, and Miramar Water Treatment Plant. These three plants have a total capacity of 294.4 million gallons per day.

The City's two recycled water facilities, North City Water Reclamation Plant (NCWRP) and South Bay Water Reclamation Plant, were built to treat wastewater to a level approved for landscaping irrigation, manufacturing, and other specified non-potable uses. These recycled water facilities not only provide water to City residents and businesses, but also to other jurisdictions and water districts, including the City of Poway and the Olivenhain Municipal Water District. As part of the City's water resource strategy, Pure Water San Diego is the City's phased, multi-year program that will provide one-third of San Diego's water supply locally by 2035. The Pure Water Program will use proven water purification technology to clean recycled water to produce safe, high-quality drinking water and provide a reliable, sustainable water supply. Phase 1 of the program is comprised of four projects in North City that will deliver 30 million gallons per day of purified water to Miramar Reservoir to blend with the City's imported and local water sources before it is treated again at the Miramar Drinking Water Treatment Plant and distributed to the public. The projects include the Morena Pump Station and Pipeline, the North City Water Reclamation Plant Expansion, the North City Pure Water Facility, and the North City Pure Water Pump Station and Pipeline. All Phase 1 projects are currently in the design phase, with construction anticipated to begin in 2019 and be complete in mid- and late 2021. Projects under Phases 2 and 3 of the program, in the Central Area and South Bay, will deliver an additional 53 million gallons per day by 2035.

The PUD emphasizes the importance of water conservation to minimize water demand and avoid excessive water use. The PUD's Water Conservation Program, established in 1985, accounts for approximately 73,000 acre-feet of potable water savings per year. These savings have been achieved through creation of a water conservation ethic and implementation of programs, policies, and ordinances designed to promote water conservation practices, including irrigation management. In accordance with SDMC Section 147.04, all residential, commercial, and industrial buildings, prior to a change in ownership, are required to be certified as having water-conserving plumbing fixtures in place. The PUD also examines new water saving technologies and annually checks progress toward conservation goals, working collaboratively with MWD and SDCWA to formulate new conservation initiatives.

The City developed a Long-Range Water Resources Plan (2002–2030) to address the projected need for additional water supplies. This plan detailed existing water supplies, new water supply opportunities, objectives and performance measures, and ultimately conclusions and recommendations. The plan is to be implemented in three phases to meet the City's growing demands and to make adjustments as necessary. The three phases are 2010, 2020, and 2030.

In June 2016, the City issued the Final 2015 UWMP that addresses the City's water system, water supply sources, and historic and projected water use, and provides a comparison of water supply to water demands during average, single-dry, and multiple-dry year periods. The UWMP was prepared in accordance with the Urban Water Management Act (as amended, California Water Code, Sections 10610 through 10656), which requires every urban water supplier that provides water for municipal purposes to

more than 3,000 connections or supplying more than 3,000 acre-feet of water annually to adopt and submit a plan every 5 years to the California Department of Water Resources.

In accordance with the Conservation Element of the City's General Plan (Policy CE-A.11), development projects shall implement sustainable landscape design such as planting "deciduous shade trees, evergreen trees, and drought-tolerant native vegetation, as appropriate, to contribute to sustainable development goals" and using "recycled water to meet the needs of development projects to the maximum extent feasible" to aid in water conservation (City of San Diego 2008b).

The Old Town community is served by existing 6-inch- to 36-inch-diameter public water mains located in a grid pattern within the connecting streets. Water is distributed to businesses and residences through private water lines that connect to the public water main via public water service meters.

Metropolitan Water District of Southern California

MWD was formed in 1928 to develop, store, and distribute supplemental water in Southern California for domestic and municipal purposes. The MWD is a wholesale supplier of water to its member agencies, which include the SDCWA. It obtains supplies from local sources as well as the Colorado River via the Colorado River Aqueduct, which it owns and operates, and the Sacramento-San Joaquin Delta via the State Water Project. Planning documents such as the Regional Urban Water Management Plan (RUWMP) and Integrated Water Resources Plan (IWRP) help ensure the reliability of water supplies and the infrastructure necessary to provide water to Southern California.

The MWD's 2010 RUWMP documents the availability of these existing supplies and additional supplies necessary to meet future demands, includes the resource targets included in the IWRP, and contains a water supply reliability assessment that includes a detailed evaluation of the supplies necessary to meet demands over a 25-year period in average, single-dry year, and multiple-dry year periods. MWD's recently adopted IWRP (2010) identifies a mix of resources (imported and local) that, when implemented, will provide 100 percent reliability for full-service demands. Service demands will be met through the attainment of regional targets set for conservation, local supplies, State Water Project supplies, Colorado River supplies, groundwater banking, and water transfers through year 2035.

San Diego County Water Authority

SDCWA purchases water from the MWD that is delivered to the region through two aqueducts. Of the MWD's 26 cities and member agencies, the SDCWA is the largest member agency in terms of deliveries and purchases, with about 25 percent of all the water that MWD delivered in fiscal year 2007. As a retail member agency of the SDCWA, the PUD purchases water from the SDCWA for retail distribution within its service area. As discussed above, in 2014, MWD deliveries accounted for around 49 percent of the total supply with new sources and conservation efforts accounting for the remaining 51 percent.

The SDCWA's 2015 UWMP was adopted by the SDCWA Board on June 23, 2016, in accordance with state law and the RUWMP. The plan contains a water supply reliability assessment that identified a diverse mix of imported and local supplies necessary to meet demands over the next 25 years in average, single-dry year, and multiple-dry year periods. The UWMP documents that no shortages are anticipated within its service area. The SDCWA also prepared an annual water supply report for use by its members that provides updated documentation on existing and projected water supplies.

b. Water, Sewer, and Storm Water Infrastructure

Wastewater in the proposed Old Town CPU area is managed by the PUD Wastewater Branch, which operates the two components of the City's wastewater system: the Metropolitan Sewerage System and the Municipal Wastewater Collection System. The metropolitan system treats wastewater for a service area of 450 square miles, stretching from Del Mar and Poway in the north to Alpine and Lakeside in the east and the border of Mexico in the south. The service area includes the City of San Diego and 15 other cities and districts. The system serves a population of about 2.2 million and treats an average of 180 million gallons of wastewater per day.

The Municipal Wastewater Collection System is responsible for the collection and conveyance of wastewater from residences and businesses in the City of San Diego, serving a 330-square-mile area with a population of 1.3 million people. The Municipal Wastewater Collection System consists of over 2,894 miles of sewer lines, nine major pump stations, and 75 smaller pump stations. Wastewater is conveyed via the pump stations to the NCWR, the Point Loma Wastewater Treatment Plant, and the South Bay Water Reclamation Plant. Treated effluent is discharged to the Pacific Ocean through the Point Loma Ocean Outfall or the South Bay Ocean Outfall.

The largest pump stations in the collection system are pump stations #1 and #2. Pump Station #1, located on East Harbor Drive, collects all of south San Diego's wastewater and has an average daily flow of 75 million gallons. It sends the wastewater flow north via the 8-mile South Metro Interceptor to Pump Station #2, which is located on North Harbor Drive. The average daily flow into Pump Station #2 is approximately 180 million gallons. This station pumps the wastewater to the Point Loma Wastewater Treatment Plant through two 87-inch force mains.

The Point Loma Wastewater Treatment Plant, located on the coast, processes approximately 175 million gallons a day of wastewater generated by 2.2 million residents and workers. The plant has a treatment capacity of 240 million gallons per day. The plant discharges to the Point Loma Ocean Outfall, a 4.5-mile-long outfall that ends at a depth of 320 feet. The current modified NPDES permit for the Point Loma Wastewater Treatment Plant and outfall was renewed in 2010.

The PUD also operates the Metro Biosolids Center, a state-of-the-art regional biosolids treatment facility, which turns waste into dewatered biosolids that are currently used as soil amendments, landfill, and landfill cover, but which also may be used to promote growth of agricultural crops. Sludge from the Point Loma Wastewater Treatment Plant is transported through the 17-mile Miramar Sludge Pipeline for treatment at the Biosolids Center along with solids from the NCWR. Any remaining wastewater from the treatment process is returned to the Point Loma Wastewater Treatment Plant.

The PUD anticipates that planned improvements to the wastewater system will increase capacity to serve a population of 2.9 million, or 340 million gallons of wastewater per day, by the year 2050. Beginning in 2007, the City increased water and sewer rates to replace and improve both the water and sewer systems infrastructure. Some pipelines have been in operation for a hundred years and need to be replaced. The City of San Diego Water Department's Capital Improvement Program Guidelines and Standards provides the framework for the design and construction of new water facilities and addresses water efficiency, conservation, recycled and reclaimed water, cost effectiveness, and timely construction.

The City also monitors and maintains the water and sewer system on an ongoing basis because of the age of the water and sewer infrastructure in the older communities. In a continuing replacement program, outmoded concrete sewer mains and cast iron water mains are being replaced on a Citywide basis through the annual CIP. Replacement is currently scheduled based on breaks or blockages in the mains.

The proposed Old Town CPU area is located in the City of San Diego PUD service area. The PUD serves more than 1.3 million residents in the City and in certain surrounding areas, including both retail and wholesale customers. The PUD relies on imported water as its major water supply source and is a member agency of the SDCWA, which is in turn a member agency of the MWD. The PUD currently purchases approximately 85 to 90 percent of its water from the SDCWA, which supplies the water (raw and treated) through two aqueducts consisting of five pipelines. In addition, the PUD uses three local supply sources to meet or offset potable demands: local surface water, conservation, and recycled water. The PUD water system extends over 404 square miles, including 324 square miles in the City, and includes potable and recycled water facilities.

The Transportation and Storm Water Department is responsible for the operation and maintenance of streets, sidewalks, and storm drains; leads efforts to protect and improve the water quality of rivers, creeks, bays, and the ocean; performs traffic and transportation system engineering; manages the utilities undergrounding program; and plans and coordinates work in the public right-of-way. Storm drains are designed to handle normal water flow, but occasionally flooding will occur during heavy rain. Storm water infrastructure conveys storm water to receiving water bodies but does not treat storm water. Pollution picked up by storm water affects people as well as aquatic plant and animal life. Oil and grease from parking lots and roads, leaking petroleum storage tanks, pesticides, cleaning solvents, and other toxic chemicals can contaminate storm water and be transported into receiving waters.

Storm drain infrastructure within public streets in the community would be upgraded through capital improvement projects; however, new regulations require storm water flow to be controlled within individual project sites. The City's Regional MS4 Permit, issued by the San Diego RWQCB, requires all development and redevelopment projects to implement storm water source control and site design practices to minimize the generation of pollutants. Additionally, the permit requires new development and significant redevelopment projects that exceed certain size threshold to implement Structural Storm Water Best Management Practices (Structural BMPs) to reduce pollutants in storm water runoff and control runoff volume. There is also an increased reliance on Low Impact Development (LID) strategies to meet the MS4 Permit and total maximum daily load requirements. Examples of LID techniques include bioretention cells, green roofs, permeable pavement, infiltration basins, and biofiltration planters. The SWRCB Construction General Permit and Industrial General Permit regulate additional waste discharge requirements.

c. Solid Waste and Recycling

The City provides refuse, recycling, and yard waste collection services to some residents per the People's Ordinance (SDMC Section 66.0127), adopted in 1919. These services are provided without a fee primarily to single-family homes, and also some multi-family facilities, using General Fund monies. Residences on private streets, commercial land uses, and certain multi-family residences are not served by the City, and must obtain the services of one of the City's franchised haulers.

Solid waste generated in the proposed CPU area is predominantly collected by private franchised haulers and taken to one of three active landfills permitted to accept solid waste: West Miramar Landfill (WML), Otay Landfill, and Sycamore Sanitary Landfill (Sycamore Landfill). Miramar Landfill and Sycamore Landfill are located within the City. Otay Landfill is located within an unincorporated area within the City of Chula Vista. The Greenery at the Miramar Landfill provides the majority of organic waste processing capacity. Based on projected generation rates, the San Diego region is anticipated to exceed the ability of existing infrastructure to manage waste. The State requires infrastructure to divert commercial waste per the 2011 Assembly Bill (AB) 341, and requires 15 years of organic waste processing capacity per AB 1826 (2014).

Per AB 341, 75 percent of waste must be diverted from disposal in landfills. Of the remaining 25 percent of residuals requiring disposal, 15 years of disposal capacity is the target. WML is permitted to receive 8,000 tons per day, and on average, it receives less than 1,000,000 tons per year. The anticipated closure date for WML is 2030. Sycamore Landfill is permitted to receive a maximum of 5,000 tons per day and is expected to operate until 2031. Otay Landfill is permitted to receive 6,700 tons per day and is expected to serve the region through 2021 (CalRecycle 2017).

d. Roadways

The City's PUD provides a full range of engineering services for the City's capital investment in various types of infrastructure, including roadways, and provides traffic engineering services to the communities. The department is responsible for the planning, design, project management, and construction management of public improvement projects, and also for providing traffic operations and transportation engineering services.

Operation and maintenance of roadways are managed by the Streets Division of the City's Transportation and Storm Water Department. The Streets Division is responsible for the maintenance of roadways, bridges, sidewalks, traffic control devices, street lighting, and urban forestry.

e. Energy

Electricity

San Diego Gas & Electric (SDG&E) is the owner and operator of electricity transmission, distribution, and natural gas distribution infrastructure in San Diego County, and currently provides gas and electric services to the Old Town community. SDG&E is regulated by the California Public Utilities Commission (CPUC). The CPUC sets the gas and electricity rates for SDG&E and is responsible for making sure that California utilities customers have safe and reliable utility service at reasonable rates, protecting utilities customers from fraud, and promoting the health of California's economy.

There are two major operating power plants in San Diego County: the Encina Power Plant and the San Onofre Nuclear Generating Station. However, it should be noted that the reactors at the San Onofre Nuclear Generating Station have been offline since January 2012, and the station is set to undergo decommissioning. There are also a number of smaller generating plants in the county used as backup during times of peak power demand. These in-region assets are currently capable of generating approximately 2,360 megawatts (MW) of electricity, about 55 percent of the region's summer peak demand. However, San Diego's older in-region resources typically run at partial capacity (1,628 MW) due to air quality, high fuel cost, and other reasons. Power generation and power use are not linked

geographically. Electricity generated is fed into the statewide grid and is generally available to any users statewide. SDG&E purchases electricity from this statewide grid through various long-term contracts.

Along with traditional utilities, private generating companies, and state agencies, the California Independent System Operator (CAISO) is a component of the state's electricity industry. The CAISO is a not-for-profit public benefit organization that operates the state's wholesale power grid. The CAISO strives to make sure California's electricity needs are met.

Natural Gas

Natural gas is imported into the San Diego region by pipeline after being produced at any of several major supply basins located from Texas to Alberta, Canada. Although the San Diego region has access to all of these basins by interstate pipeline, the final delivery into the SDG&E system is dependent on just one Southern California Gas Company (SoCalGas) pipeline that enters San Diego County from Orange County located along I-5.

Natural gas consumption by sector varies somewhat each year. In general, power plants account for the highest percentage of natural gas consumption in the San Diego region. Residential consumption of natural gas for heating and cooking is the second highest percentage, followed by cogeneration, commercial and industrial consumption, and natural gas fueled vehicles.

Solar Energy

In San Diego, solar energy can be used as an alternative to fossil-fuel energy via private on-site installation/generation or through earmarked purchase of green power from SDG&E. The California Energy Commission (CEC) mandated SDG&E to provide 20 percent of its total energy from solar or other renewable energy sources by the year 2010. While SDG&E missed this goal in 2010, the *Renewables Portfolio Standard Quarterly Report, 1st and 2nd Quarter 2012*, issued by CPUC, states that SDG&E, the region's primary energy provider, "served 20.8 percent of its 2011 retail sales with RPS-eligible renewable energy," thereby meeting the 2010 goal. SDG&E was also ahead of schedule in meeting a 25 percent goal by 2016, as well as the long-term goal of 33 percent by 2020, by achieving 36.4 percent RPS procurement in 2014. SDG&E is also well on the way to meeting the state's new RPS target of 50 percent renewable by 2030, set in 2015, with 43.1 percent RPS procurement under contract for 2020.

Currently, there are no mandated standards or ordinances requiring reliance on alternative energy by new developments. However, the City's CAP establishes a goal to achieve 100 percent renewable energy on the Citywide electrical grid by 2035. Additionally, Title 24 of the California Public Resources Code does contain mandated energy efficiency requirements for all new developments.

e. Communications

Communications systems for telephone, computers, and cable television are serviced by utility providers such as AT&T, Cox, Spectrum (formerly Time Warner), and other independent cable companies. In addition, television services are available from the two satellite services, DirecTV and Dish. Facilities are located above and below ground within private easements. In recent years, the City has initiated programs to promote economic development through the development of high-tech infrastructure and integrated information systems. The City also works with service providers to underground overhead

wires, cables, conductors, and other overhead structures associated with communication systems in residential areas in accordance with proposed development projects. Individual development projects consisting of more than four lots are subject to SDMC Section 144.0240, which requires privately owned utility systems and service facilities to be placed underground.

2.3.13 Biological Resources

2.3.13.1 Vegetation Communities

Eleven vegetation communities/land cover types occur within the Biological Study Area (BSA) as shown in Figure 2-7. Table 2-8 lists acreages per vegetation community/land cover type. A general description of each vegetation community and land cover type present within the BSA is provided below.

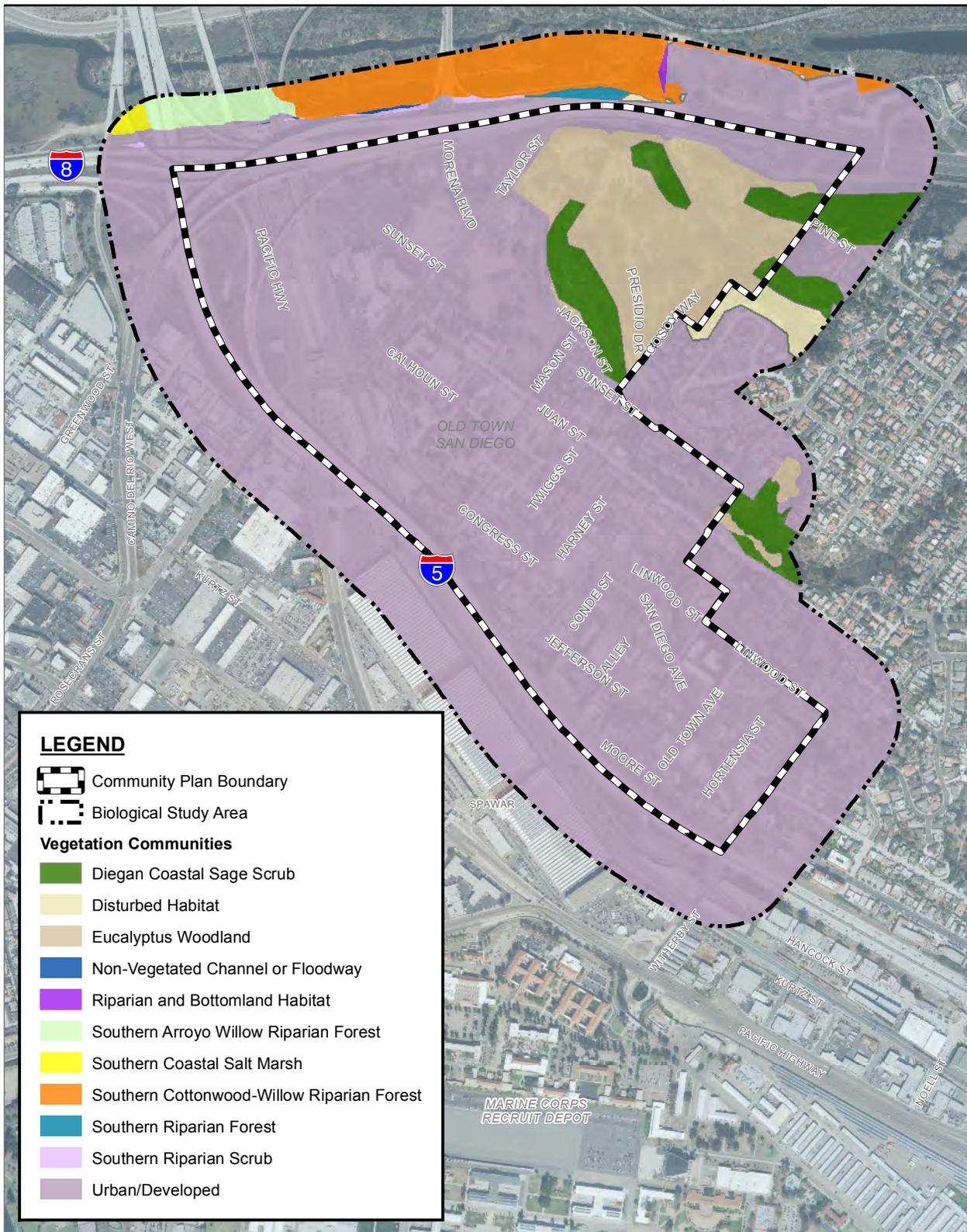
Table 2-8 Vegetation Communities and Land Cover Types within the Biological Study Area				
Vegetation Community/ Land Cover Type	MSCP Wetland/Upland Tier Category	Proposed Old Town CPU (acres)	500-Foot Buffer (acres)	Total within BSA (acres)
Riparian and Wetlands Habitat				
Non-Vegetated Channel or Floodway	Wetland		0.18	0.18
Riparian and Bottomland Habitat	Wetland		0.22	0.22
Southern Arroyo Willow Riparian Forest	Wetland		4.54	4.54
Southern Coastal Salt Marsh	Wetland		0.82	0.82
Southern Cottonwood-Willow Riparian Forest	Wetland		20.84	20.84
Southern Riparian Scrub	Wetland		0.63	0.63
Southern Riparian Forest	Wetland		0.86	0.86
Upland Habitat				
Diegan Coastal Sage Scrub	Tier II	10.57	10.41	20.98
Other Land Cover Types				
Disturbed Habitat	Tier IV		4.38	4.38
Eucalyptus Woodland	Tier IV	36.96	1.53	38.49
Urban/Developed	Tier IV	227.15	173.66	400.81
	Totals	274.68	218.09	492.77

Source: SANDAG 2014; City of San Diego 2017c; County of San Diego 2015

Note: Totals may not add due to rounding

Riparian and Wetland Habitat

Wetland vegetation communities are dominated by plant species adapted to soils that have periods of prolonged saturation. Wetland vegetation communities are considered sensitive and regulated by the USACE, USFWS, CDFW, RWQCB, and the City of San Diego. Several wetland communities occur within the BSA and are described below.



Source: SANDAG 2014; City of San Diego 2017; County of San Diego 2015

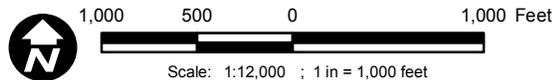


Figure 2-7
Existing Vegetation Communities
and Land Cover Types

Non-Vegetated Channel or Floodway

Non-vegetated channel or floodway habitat consists of the sandy, gravelly, or rocky fringe of waterways or flood channels. This habitat type is typically unvegetated on a permanent basis. Approximately 0.18 acre of non-vegetated channel or floodway is located in the 500-foot buffer, along the San Diego River corridor.

Riparian and Bottomland Habitat

Riparian and bottomland habitats occur on the low-lying floodplain of a river or waterway. There is about 0.22 acre of riparian and bottomland habitat located in the 500-foot buffer in the San Diego River corridor.

Southern Arroyo Willow Riparian Forest

Southern arroyo willow riparian forest is a winter-deciduous riparian forest habitat dominated by moderately tall, broadleaved trees and by arroyo willow (*Salix lasiolepis*). The canopy of this habitat is closed or nearly closed, and the understory is composed of shrubby willows.

Approximately 4.54 acres of southern arroyo willow riparian forest is located in the 500-foot buffer area in the northwest corner of the BSA, along the San Diego River.

Southern Coastal Salt Marsh

Southern coastal salt marsh is an association of herbaceous and suffrutescent, salt-tolerant hydrophytes that form a moderate to dense cover and can reach a height of 1 meter (3 feet). There is approximately 0.82 acre of southern coastal salt marsh in the 500-foot buffer, located in the extreme northwest of the BSA.

Southern Cottonwood-Willow Riparian Forest

Southern cottonwood-willow riparian forest habitats are characterized by tall, open, broadleaved winter-deciduous species. This habitat is typically dominated by Fremont cottonwood (*Populus fremontii*), black cottonwood (*P. trichocarpa*), and several tree willows, with understories consistent of shrubby willows.

There is 20.84 acres of southern cottonwood-willow riparian forest habitat located in the 500-foot buffer, constituting a large amount of area of the northern section of the buffer along the San Diego River corridor.

Southern Riparian Scrub

Southern riparian scrub habitats are dominated by small shrubs and trees, without the presence of taller riparian trees. This habitat type can be found encroaching into some coastal saltmarsh habitats and is mostly found in major river systems where flood scour occurs. Approximately 0.63 acre of southern riparian scrub occurs in the northern buffer area along the San Diego River corridor.

Southern Riparian Forest

Southern riparian forest habitat is dominated by dense stands of riparian trees, with characteristic species: western sycamore (*Platanus racemose*), cottonwood trees (*Populus* spp.), and many other wetland plants. This habitat type is found along streams and rivers and about 0.86 acre is located in the 500-foot buffer along the San Diego River corridor.

Upland Habitat

Diegan Coastal Sage Scrub

Diegan coastal sage scrub is characterized by low, soft-woody subshrubs. Many taxa are facultatively drought-deciduous. This vegetation community is often dominated by California sagebrush (*Artemisia californica*) and California buckwheat (*Eriogonum fasciculatum*) together with laurel sumac (*Malosma laurina*), white sage (*Salvia apiana*) and black sage (*Salvia mellifera*).

Approximately 10.57 acre of Diegan coastal sage scrub is located in the proposed CPU area, with 10.41 acres located in the 500-foot buffer for a total of 20.98 acres within the BSA.

Other Land Cover Types

Disturbed Habitat

Disturbed habitat is characterized by predominantly nonnative species introduced and established through human action. These areas are not typically artificially irrigated, but receive water from precipitation or runoff. Disturbed habitat constitutes about 4.38 acres in the 500-foot buffer southeast of Presidio Park.

Eucalyptus Woodland

Eucalyptus woodland habitat is characteristic of single or mixed stand of *Eucalyptus* species that consist of a range of thickets with little or no shrubby understory. Eucalyptus species create a large amount of leaf litter that is physically and chemically prohibitive of understory growth.

Eucalyptus woodland constitutes the majority of habitat within the Multi-Habitat Planning Area (MHPA) located in the proposed CPU within Presidio Park. There are approximately 36.96 acres of eucalyptus woodland located in Presidio Park and 1.53 acres in the 500-foot buffer east of Presidio Park.

Urban/Developed

Urban/developed areas have been constructed upon or otherwise physically altered to an extent that native vegetation is no longer supported. Developed land is characterized by permanent or semi-permanent structures, pavement or hardscape, and landscaped areas that often require irrigation. The majority of areas within the project site and much of the 500-foot buffer are considered developed. This includes buildings, roads, parking lots, and landscaping of nonnative vegetation.

The majority of land cover type in the BSA, both in the proposed CPU and in the 500-foot buffer, is urban/developed. There are approximately 227.15 acres of urban/developed land cover types in the proposed CPU and approximately 173.66 acres in the 500-foot buffer.

2.3.13.2 Jurisdictional Resources

The proposed CPU occurs almost entirely within urban/developed habitat. Riparian and wetland habitats within the San Diego River corridor in the buffer north of the proposed CPU could potentially fall under CDFW and USACE jurisdiction. These features would also qualify as wetland habitat under the City's Biology Guidelines (City of San Diego 2012).

2.3.13.3 Sensitive Plants

Based on a review of the California Natural Diversity Database (CNDDDB) and a review of the habitat within the BSA, nine special-status plant species have been documented or have potential to occur within the BSA (Table 2-9). Several of the species documented within the BSA represent historical locations that no longer contain suitable habitat for plants within the BSA and populations are likely extirpated. Species not expected to occur within the BSA or with low or moderate potential to occur within the BSA are summarized in Table 2-9 and not further discussed in this text. One special-status plant species, spiny rush (*Juncus acutus* subsp. *leopoldii*), with high potential to occur within the BSA is detailed below.

Table 2-9 Special-Status Plant and Wildlife Species Documented or with Potential to Occur within the Biological Study Area				
Species	Status ¹	MSCP Covered (Yes/No) ³	General Habitat (Unitt 2004; Lightner 2011; Osborne 2014; WBWG 2017)	Potential for Occurrence within the Biological Study Area
Plants				
beach goldenaster <i>Heterotheca sessiliflora</i> ssp. <i>sessiliflora</i>	CRPR 1B.1	No	Sandy openings in scrub habitat; elevation <5,000 feet.	Low potential to occur; BSA is highly developed habitat lacking appropriate habitat.
Brand's star phacelia <i>Phacelia stellaris</i>	CRPR 1B.1	No	Open areas, coastal sage scrub; elevation <400 feet.	Low potential to occur; BSA is highly developed habitat lacking coastal sand dunes.
coast wooly-heads <i>Nemacaulis denudata</i> var. <i>denudate</i>	CRPR 1B.2	No	Coastal sand dunes; elevation <100 feet.	Low potential to occur; BSA is highly developed habitat lacking coastal sand dunes.
Coulter's goldfields <i>Lasthenia glabrata</i> ssp. <i>coulteri</i>	CRPR 1B.1	No	Grassland, scrub, chaparral, burned habitat; elevations <6,500 feet.	Low potential to occur; BSA is highly developed habitat, species may occur in the BSA buffer along the San Diego River corridor.
decumbent goldenbush <i>Isocoma menziesii</i> var. <i>decumbens</i>	CRPR 1B.2	No	Marshes, river mouths, valleys, disturbed fields; elevations <3,500 feet.	Low potential to occur; common species in coastal salt marshes and may occur in the BSA buffer along the San Diego River corridor.

Table 2-9 Special-Status Plant and Wildlife Species Documented or with Potential to Occur within the Biological Study Area				
Species	Status ¹	MSCP Covered (Yes/No) ³	General Habitat (Unitt 2004; Lightner 2011; Osborne 2014; WBWG 2017)	Potential for Occurrence within the Biological Study Area
estuary sea-blite <i>Suaeda esteroa</i>	CRPR 1B.2	No	Coastal salt marshes; elevations <50 feet.	Low potential to occur; common species in coastal salt marshes and may occur in the BSA buffer along the San Diego River corridor.
light gray lichen <i>Mobergia calculiformis</i>	CRPR 3	No	Diverse variety of substrate.	Low potential to occur; species unlikely to occur in the BSA.
Nuttall's scrub oak <i>Quercus dumosa</i>	CRPR 1B.1	No	Costal chaparral and urban canyons, at elevations <1,500 feet.	Low potential to occur; species may occur in developed habitats, less likely in the wetland-type habitats of the BSA buffer.
spiny rush <i>Juncus acutus</i> subsp. <i>leopoldii</i>	CRPR 4.2	No	Wet alkaline places, coastal marshes, river valleys, and by desert creeks, at elevations <3,000 feet.	High potential to occur (buffer only); species very likely along wetland habitats in the BSA and BSA buffer.
Wildlife				
American Peregrine Falcon <i>Falco peregrinus anatum</i>	CFP; SSC	Yes	Nest sites on cliff ledges, previously constructed nests, and human-made structures such as buildings, cranes, and bridges.	Low potential to occur; rare species in San Diego and the BSA is highly developed habitat lacking suitable habitat.
Belding's Savannah Sparrow <i>Passerculus sandwichensis beldingi</i>	CE	Yes	Nest sites on or near the ground in dense marsh vegetation.	High potential to occur; Habitat is present within the San Diego River.
California Least Tern <i>Sternula antillarum browni</i>	FE; CE	Yes	Nest sites consist of a scrape in sand or dirt.	Low potential to occur; species may use the BSA during winter or for foraging; however, breeding is unlikely in the BSA.
Least Bell's Vireo <i>Vireo bellii pusillus</i>	FE; CE	Yes	Nest sites predominantly occur on coastal slopes and in willows and mulefat.	High potential to occur; species may use the BSA during winter or for foraging; however, breeding is unlikely in the BSA.
Light-footed Ridgway's Rail <i>Rallus obsoletus levipes</i>	FE; CE; CFP	Yes	Nest sites predominate in tidal marshes dominated by cordgrass.	High potential to occur; species recorded as breeding in 1997 (Unitt 2004); habitat is present within the San Diego River.

Table 2-9 Special-Status Plant and Wildlife Species Documented or with Potential to Occur within the Biological Study Area				
Species	Status ¹	MSCP Covered (Yes/No) ³	General Habitat (Unitt 2004; Lightner 2011; Osborne 2014; WBWG 2017)	Potential for Occurrence within the Biological Study Area
Mexican long-tongued bat <i>Choeronycteris mexicana</i>	SSC	no	Roosting occurs at entrances of caves, mines, rock crevices, and abandoned buildings.	Low potential to occur; highly developed habitat provides little habitat for foraging and roosting.
Western Snowy Plover <i>Charadrius alexandrinus nivosus</i>	FT; SSC	Yes	Nest sites in sand or dried mud scrapes.	Low potential to occur; species may use the BSA during winter or for foraging; however, breeding is unlikely in the BSA.

Source: CDFW 2017

¹ FE = USFWS Endangered Species

FT = USFWS Threatened Species

USFS-S = U. S. Forest Service – Sensitive Species

CE = CDFW Endangered Species

CFP = CDFW Fully Protected Species

SSC = CDFW Species of Special Concern

CRPR: California Rare Plant Rank:

1B: Plants rare, threatened, or endangered in California and elsewhere

2B: Plants rare, threatened, or endangered in California, but more common elsewhere

3: Plants about which more information is needed – review list

4: Plants of limited distribution – a watch list

Decimal notations: .1 – Seriously endangered in California, .2 – Fairly endangered in California, .3 – Not very endangered in California

Spiny Rush (*Juncus acutus* subsp. *leopoldii*)

Spiny rush has a high potential to occur in any wetland or water habitat. This perennial grasslike herb is native to California and is currently included on the California Native Plant Society (CNPS) Inventory of Rare and Endangered Plants at California Rare Plant Rank (CRPR) 4 – *Plants of Limited Distribution – a Watch List* (CNPS 2017). In the BSA, spiny rush has high potential to occur in the buffer area along the San Diego River corridor in the 500-foot buffer area north of the proposed CPU area (Figure 2-7).

2.3.13.4 Sensitive Wildlife

Based on a review of CNDDDB data and a review of the habitat within the BSA, seven special-status wildlife species have been documented or have potential to occur within the BSA (Table 2-9). Several of the species documented within the BSA represent historical locations that no longer have habitat within the BSA and the populations are likely extirpated. Species not expected to occur within the BSA or with low or moderate potential to occur within the BSA are summarized in Table 2-9 and are not further discussed in this text. Three special-status wildlife species, Light-footed Ridgway's Rail (*Rallus obsoletus levipes*), Belding's Savannah Sparrow (*Passerculus sandwichensis beldingi*), and Least Bell's Vireo (*Vireo bellii pusillus*), have high potential to occur in the BSA.

Light-footed Ridgway's Rail (*Rallus obsoletus levipes*)

Light-footed Ridgway's Rail is federally and state listed as endangered and is a covered species under the City of San Diego's Multiple Species Conservation Program (MSCP). The species is restricted to coastal salt marshes in Southern California, such as San Dieguito and Los Peñasquitos lagoons, where vegetation is dominated by cordgrass and pickleweed. Habitat for this species occurs within the San Diego River north of I-8. The nearest and most recent CNDDDB location occurred in 2007, near the mouth of the San Diego River at the Morena Boulevard overpass (CDFW 2017).

Belding's Savannah Sparrow (*Passerculus sandwichensis beldingi*)

Belding's Savannah Sparrow is a state-listed endangered species and is a covered species under the City's MSCP. Belding's Savannah Sparrow is a resident from Santa Barbara County to northern Baja California. Its preferred habitat is pickleweed-dominated coastal salt marsh associations. Habitat for this species occurs within the San Diego River corridor north of I-8. The closest known CNDDDB location occurred in 2001, in the San Diego River control channel west of I-5 (CDFW 2017).

Least Bell's Vireo (*Vireo bellii pusillus*)

Least Bell's Vireo is federally and state listed as endangered and is a covered species under the City's MSCP. In San Diego County, it occurs mainly in the coastal lowlands, rarely up to 3,000 feet in elevation. During the breeding season, the Least Bell's Vireo is restricted to riparian woodland and riparian scrub. This species has high potential to breed and forage within the southern riparian woodland in the San Diego River channel corridor within the 500-foot buffer of the BSA. The closest known CNDDDB location occurred in 2009, in the San Diego River corridor east of the I-8 and I-5 interchange (CDFW 2017).

2.3.13.5 Wildlife Movement

Habitat connectivity is essential for the persistence of healthy and genetically diverse animal communities (Crooks and Sanjayan 2006). Wildlife corridors or linkages are linear landscape features that allow for species movement over time between two areas of habitat that would otherwise be disconnected (Beier and Noss 1998; Beier et al. 2008; Lidicker and Peterson 1999). Regional corridors (or landscape linkages) link two or more large areas of natural open space, and local corridors (or dispersal corridors) allow resident animals to access critical resources (food, water, and cover) in areas that might otherwise be isolated. At a minimum, corridors promote local colonization or recolonization of distinct habitats, potentially increase genetic variability within and between populations, and maintain appropriate predator/prey relationships. Wildlife movement activities typically fall into one of three movement categories: local and regional dispersal (e.g., juvenile animals from natal areas or individuals extending range distributions), regional seasonal migration, and local movements related to home range activities (foraging for food or water, defending territories, searching for mates, breeding areas, or cover).

Human encroachment and other disturbances (e.g., light, loud noises, domestic animals) associated with developed areas that have caused habitat fragmentation may have a negative effect on corridors (Schweiger et al. 2000). Therefore, wildlife corridors may function at various levels depending upon these factors and the species. The level of connectivity needed to maintain a population of a particular species will vary with the demography of the population, including population size, survival and birth rates, and genetic factors such as the level of inbreeding and genetic variance (Rosenberg et al. 1997). Areas not

considered as functional wildlife dispersal corridors or linkages are typically obstructed or isolated by concentrated development and heavily traveled roads, known as “chokepoints.” One of the worst scenarios for dispersing wildlife occurs when a large block of habitat leads animals into “cul-de-sacs” of habitat surrounded by development. These habitat cul-de-sacs frequently result in adverse human/animal interface.

The San Diego River corridor that runs along the northern portion of the BSA functions as a portion of a landscape linkage providing connection of coastal and inland habitats (Penrod et al. 2001). The City of San Diego recognized the importance of this riparian corridor as a landscape linkage for amphibians, reptiles, birds, and small- and medium-sized mammals when delineating the MHPA for the City’s MSCP. In spite of the urbanized surrounding area, the San Diego River riparian habitat is an area of relatively high species diversity and abundance and provides a regional corridor. Concentrated development and heavily traveled roads surrounding the San Diego River corridor limit terrestrial species from using this corridor to disperse to adjacent canyons. However, this regional corridor supports avian or bat species that are capable of flying over barriers to adjacent habitat. Developed lands account for almost the entirety of the proposed CPU area, so there are no wildlife corridors in that area. The San Diego River corridor, in the 500-foot buffer area to the north of the proposed CPU area, may serve as a wildlife corridor for avian or bat species. Additionally, the MHPA habitat east of the San Diego River corridor and in/adjacent to Presidio Park likely serves as a stopover site for some migratory bird and bat species (Figure 5.13-2).

2.3.14 Paleontology

Paleontological resources (i.e., fossils) are the buried remains and/or traces of prehistoric organisms (i.e., animals, plants, and microbes). Body fossils such as bones, teeth, shells, leaves, and wood, as well as trace fossils such as tracks, trails, burrows, and footprints, are found in the geological deposits (formations) within which they were originally buried. The primary factor determining whether an object is a fossil is not how the organic remain or trace is preserved (e.g., “petrified”), but rather the age of the organic remain or trace. Although, typically, it is assumed that fossils must be older than 10,000 years (i.e., the generally accepted end of the last glacial period of the Pleistocene Epoch), organic remains of early Holocene age can also be considered to represent fossils because they are part of the record of past life.

Fossils are considered important scientific and educational resources because they serve as direct and indirect evidence of prehistoric life and are used to understand the history of life on Earth, the nature of past environments and climates, the membership and structure of ancient ecosystems, and the pattern and process of organic evolution and extinction. In addition, fossils are considered to be non-renewable resources because, typically, the organisms they represent no longer exist. Thus, once destroyed, a particular fossil can never be replaced. And finally, paleontological resources can be thought of as including not only the actual fossil remains and traces, but also the fossil collecting localities and the geological formations containing those localities. To evaluate paleontological resources in the proposed CPU area, the presence and distribution of geologic formations and the respective potential for paleontological resources must be evaluated.

2.3.14.1 Physical Geological Setting

The Coastal Plain region of San Diego County is underlain by a layer cake sequence of marine and non-marine sedimentary rock units that record portions of the last 140 million years of Earth's history. Over this period of time, the relationship of land and sea has drastically fluctuated, such that today, there are ancient marine rocks preserved up to elevations of 900 feet above sea level and ancient river deposits as high as 1,200 feet. Faulting related to the local La Nacion Fault Zone and RCFZ has broken up this sedimentary sequence into a number of distinct fault blocks in the southwestern part of the county.

See Section 2.3.4 for further discussion of the existing geologic conditions in the proposed CPU area.

2.3.14.2 Geologic Formations

Knowing the geology of a particular area and the fossil productivity of formations that occur in that area, it is possible to predict where fossils will, or will not, be encountered. Geologic formations located within the proposed CPU area include Bay Point, San Diego, and Scripps formations, which are assigned high resource sensitivity, and Lindavista Formation, which is assigned low resource sensitivity. This varies slightly from the formations listed in the Seismic and Geologic Technical Background Report (Wilson Geosciences Inc. 2012; Appendix F). The Mission Valley formation that is mapped on the Kennedy and Tan map (2008) was modified to be Scripps Formation in the Paleontological Resource Assessment (Deméré and Donohue 2013; Appendix M) due to the discovery of fossils in this area. These formations are primarily located on the eastern half of the proposed CPU area, while the western half of the proposed CPU area is artificial fill, which has no paleontological resource sensitivity assigned. A general overview of the geologic formations located within the proposed CPU area are described below and shown in Figure 2-4.

Bay Point Formation (Qop8)

The Bay Point Formation represents a nearshore marine to onshore fluvial sedimentary deposit of middle to late Pleistocene age (700,000 to 10,000 years old). Typical exposures consist of light gray, friable to partially cemented, fine- to coarse-grained, massive to cross-bedded sandstone. This rock unit includes marine-terrace deposits, as well as valley-fill deposits, and in some cases, river-terrace deposits. The Bay Point Formation has produced large and diverse assemblages of well-preserved marine invertebrate fossils, primarily mollusks, from many localities in the metropolitan San Diego area. Remains of fossil marine vertebrates (i.e., sharks, rays, and bony fishes) and terrestrial mammals (e.g., horse, camel, deer, mastodon, and mammoth) have also been recovered from this rock unit.

Along the northeastern portion of the proposed CPU area in Presidio Park, outcrops of the Bay Point Formation consist of oxidized, tan-orange interbedded sandstone and conglomerate units. The depositional environment here was fluvial, with conglomerate layers likely deposited during storm or high flow conditions, and sandstone layers deposited during normal flow conditions. No fossil localities within the Bay Point Formation are currently known along the eastern margin of the project area; however, any construction-related earthwork in the Bay Point Formation has the potential to unearth fossil resources. The Bay Point Formation thus is assigned a high paleontological resource sensitivity.

San Diego Formation (Tsd)

The San Diego Formation is a marine sedimentary rock unit of late Pliocene- to early Pleistocene-age (approximately 3.5 to 1.5 million years old), which was deposited in an open-marine embayment similar in size and shape to modern-day Monterey Bay. The shoreline for this ancient embayment was well to the east of the present shoreline, with beach deposits reported in Bonita, La Mesa, and Lemon Grove. Typical exposures of this formation consist of yellowish-gray, fine-grained, friable sandstone. Poorly sorted gravel, pebble conglomerate, and well-laminated claystone also occur within the formation. The maximum thickness of the unit is between 250 and 300 feet.

The formation is well known for its rich fossil beds that have yielded extremely diverse assemblages of marine clams, scallops, snails, crabs, barnacles, sand dollars, sharks, rays, bony fishes, sea birds, walrus, fur seals, sea cows, dolphins, and baleen whales. In addition, rare remains of terrestrial mammals, including cat, wolf, skunk, peccary, camel, antelope, deer, horse, and shovel-tusked elephant (gomphothere), and the occurrence of fossil wood and leaves, including remains of pine, oak, laurel, cottonwood, and avocado, have also been recovered from the formation.

Numerous recorded San Diego Society of Natural History (SDSNH) localities are present in the San Diego Formation within the project area and have produced fossils of predominantly marine mollusks (e.g., oysters, scallops, snails), but include rarer taxa such as brachiopods. The strata of the San Diego Formation are assigned a high paleontological resource sensitivity due to the high potential for continued fossil discovery during future construction activities within the project area.

Scripps Formation (Tsc)

The Scripps Formation is an early middle Eocene (46 to 47 million years ago) sedimentary rock unit of marine origin, and was deposited offshore on the continental shelf. The Scripps Formation in its type area in the sea cliffs north of the Scripps Institution of Oceanography consists of light gray, fine-grained marine sandstone reaching a thickness of 185 feet. Sedimentary rocks assigned to the Scripps Formation crop out from Presidio Park in the south, north to Del Mar, and from Clairemont west to La Jolla Valley. In the eastern and southern portions of its area of outcrop, the formation largely consists of light gray, medium-grained, fluvial sandstones and green and brown non-marine mudstones.

The Scripps Formation is considered potentially fossiliferous almost everywhere it occurs. Most of the fossils known from this formation consist of remains of marine organisms including clams, snails, crabs, sharks, rays, and bony fishes. However, remains of fossil reptiles (e.g., crocodile and turtle) and land mammals (e.g., uinatheres, brontothere, rhinoceros, and artiodactyl) have also been recovered from the formation, as well as well-preserved pieces of fossil wood and impressions of fossil leaves.

Eocene strata exposed in Heritage Park and Presidio Park consist of bluish-gray, fine-grained sandstones with localized concretionary layers and interbedded with gray siltstones. During the pedestrian survey, a 12-centimeter-thick, olive-gray, poorly sorted, very fine-grained sandstone concretionary layer was found to be fossil bearing with internal and external molds of marine gastropod snails and a moon snail, as well as unidentified bivalves. In the Presidio Park parking lot adjacent to Taylor Street, a 25-foot-thick outcrop of light tan–yellow very fine-grained sandstone interbedded with massive siltstone is exposed. Invertebrate fossils from this location include gastropod, bivalves, and trace fossil burrows. A single vertebrate bone fragment of either a fossil reptile or mammal was recovered, and precise identification will

occur with further study. Any future earthwork activities that disturb the Scripps Formation within the project area have the potential to unearth and negatively impact fossil resources. The strata of the Scripps Formation are assigned a high paleontological resource sensitivity.

Lindavista Formation (Qvop11)

The Lindavista Formation represents marine and non-marine terrace deposits of early Pleistocene age. Depositional environments were variable and included fluvial, aeolian, and shallow nearshore marine paleoenvironments. The Lindavista Formation was deposited during Pleistocene high sea level conditions. Typical exposures of the Lindavista Formation are reddish-brown interbedded sandstone and conglomerate, with an average thickness of 20 to 30 feet. Fossil localities are rare within the Lindavista Formation, although a few have been discovered in Mira Mesa and Tierrasanta. Fossils collected from the formation include nearshore marine invertebrates such as clams, scallops, snails, and sand dollars, as well as the occasional remains of sharks and baleen whales.

The Lindavista Formation is present in the northeastern portion of the project area and is exposed as a well-oxidized interbedded conglomerate and sandstone unit. Currently, no SDSNH fossil localities within the vicinity of the project area have been revealed through database record searches or pedestrian surveys. Because fossils have been documented previously within the Lindavista Formation, a moderate paleontological resource sensitivity is assigned.

Artificial Fill Materials (af)

Much of the project area is mapped as being underlain by artificial fill. Fill materials presumably were derived from earlier construction activities and were placed in such a way as to provide topographically high areas for current and future development. No fossils of paleontological interest are located in artificial fill materials. Any contained organic remains have lost their original stratigraphic/geologic context due to the disturbed nature of the artificial fill materials. Artificial fill materials are assigned a zero paleontological resource sensitivity due to the loss of the stratigraphic/geologic context of any contained organic remains (e.g., fossils).

2.3.14.3 Levels of Paleontological Resource Sensitivity

A Paleontological Monitoring Determination Matrix is provided in Table 2-10, which identifies the geologic formation, location of potential occurrence, and its sensitivity rating. Paleontological resource sensitivity of geologic formations is typically rated from high to zero. The sensitivity of the paleontological resource determines the significance of a paleontological impact. The following levels of paleontological resource sensitivity are rated for individual formations, since it is the formation that contains the fossil remains:

High Sensitivity – High sensitivity is assigned to geologic formations known to contain paleontological localities with rare, well-preserved, critical fossil materials for stratigraphic or paleoenvironmental interpretation, and fossils providing important information about the paleobiology and evolutionary history (phylogeny) of animal and plant groups. Generally speaking, highly sensitive formations produce vertebrate fossil remains or are considered to have the potential to produce such remains.

**Table 2-10
Paleontological Monitoring Determination Matrix**

Geological Deposit/ Formation/Rock Unit	Potential Fossil Localities	Sensitivity Rating
Alluvium (Qsw, Qal, or Qls)	All communities where unit occurs	Low
Ardath Shale (Ta)	All communities where unit occurs	High
Bay Point/Marine Terrace (Qbp) ¹	All communities where unit occurs	High
Cabrillo Formation (Kcs)	All communities where unit occurs	Moderate
Delmar Formation (Td)	All communities where unit occurs	High
Friars Formation (Tf)	All communities where unit occurs	High
Granite/Plutonic (Kg)	All communities where unit occurs	Zero
Lindavista Formation (Qln, Qlb) ²	Mira Mesa/Tierrasanta	High
	All other areas	Moderate
Lusardi Formation (Kl)	Black Mountain Ranch/Lusardi Canyon Poway/Rancho Santa Fe	High
	All other areas	Moderate
Mission Valley Formation (Tmv)	All communities where unit occurs	High
Mt. Soledad Formation (Tmv)	Rose Canyon	High
	All other areas where unit occurs	Moderate
Otay Formation (To)	All communities where unit occurs	High
Point Loma Formation (Kp)	All communities where unit occurs	High
Pomerado Conglomerate (Tp)	Scripps Ranch/Tierrasanta	High
	All other areas	
River/Steam Terrace Deposits (Qt)	South Eastern/Chollas Valleys/ Fairbanks Ranch/Skyline/Paradise Hills/Otay Mesa, Nestor/San Ysidro	Moderate
	All other areas	Low
San Diego Formation (Qsd)	All communities where unit occurs	High
Santiago Peak Volcanics (Jsp) Metasedimentary	Black Mountain Ranch/La Jolla Valley, Fairbanks Ranch/Mira Mesa/ Peñasquitos	Moderate
Santiago Peak Volcanics (Jsp) Metavolcanic	All other areas	Zero
Scripps Formation (Tsd)	All communities where unit occurs	High
Stadium Conglomerate (Tst)	All communities where unit occurs	High
Sweetwater Formation	All communities where unit occurs	High
Torrey Sandstone (Tf)	Black Mountain Ranch/Carmel Valley	High
	All other areas	Low

Sensitivity Rating Grading Thresholds for Required Monitoring

High = >1,000 cubic yards and 10 feet+ deep

Moderate = >2,000 cubic yards and 10 feet+ deep

Zero-Low = Monitoring not required

Baypoint¹ – Broadly correlative with Qop 1-8 of Kennedy and Tan (2008) new mapping nomenclature.

Lindavista² – Broadly correlative with Qvop 1-13 of Kennedy and Tan (2008) new mapping nomenclature.

*Monitoring is always required when grading on a fossil recovery site or near a fossil recovery site in the same geologic deposit/formation/rock unit as the project site as indicated on the Kennedy Maps.

**Monitoring may be required for shallow grading (i.e., <10 feet) when a site has previously been graded and/or unweathered geologic deposits/formations/rock units are present at the surface.

***Monitoring is not required when grading documented or undocumented artificial fill.

Source: City of San Diego CEQA Significance Thresholds 2016

Moderate Sensitivity – Moderate sensitivity is assigned to geologic formations known to contain paleontological localities with poorly preserved, common elsewhere, or stratigraphically unimportant fossil material. The moderate sensitivity category is also applied to geologic formations that are judged to have a strong, but unproven potential for producing important fossil remains.

Low Sensitivity – Low sensitivity is assigned to geologic formations that, based on their relative youthful age and/or high-energy depositional history, are judged unlikely to produce important fossil remains. Typically, low sensitivity formations produce invertebrate fossil remains in low abundance.

Zero Sensitivity – Zero sensitivity is assigned to geologic formations that are entirely igneous in origin and therefore have no potential for producing fossil remains, or to artificial fill materials, which lose the stratigraphic/geologic context of any contained organic remains (e.g., fossils).

3

Chapter 3.0 Project Description

3.1 Introduction

The project analyzed in this ~~Draft~~ PEIR is the proposed Old Town Community Plan Update (proposed CPU), as well as several discretionary actions listed in Table 3-1, Project Components. The proposed CPU and associated regulatory documents and discretionary actions form the “project” for this PEIR and are referred to throughout the PEIR as the project. The project description contained within this section provides the basis for the environmental analysis in this PEIR for the proposed CPU and the associated discretionary actions.

**Table 3-1
Project Components**

Adoption of the Old Town San Diego Community Plan
Adoption of amendments to the General Plan to incorporate the Community Plan
Rezone land within the Old Town San Diego community associated with the Old Town San Diego Planned District Ordinance to implement the Community Plan
Amendment of the San Diego Municipal Code to amend Chapter 15, Article 16 related to the Old Town San Diego Planned District Ordinance
Amendment of the San Diego Municipal Code to amend Chapter 14, Article 2 related to sign requirements
Amendment of the San Diego Municipal Code to amend Chapter 13, Article 2, Division 409 related to tandem parking requirements
Rescind the Old San Diego Architectural and Site Development Standards and Criteria
Certification of PEIR

The proposed CPU and associated regulatory documents are available for review at the City and at the following website:

Old Town San Diego: <https://www.sandiego.gov/planning/community/cpu/oldtownmidway/oldtownupdate>

The adopted Community Plan was last comprehensively updated in 1987. The project will ensure consistency of the proposed CPU with and incorporate relevant policies consistent with the General Plan, as well as provide a long-range, comprehensive policy framework and vision for growth and development in the Old Town community through 2035.

The proposed CPU provides a long-range guide for the future physical development of the community. The proposed CPU process started in 2011 with a public outreach effort centered around community meetings that included Old Town's stakeholder committee, workshops on key topics, and meetings of the Old Town Community Plan Update Committee and the City's recognized community planning group.

3.2 Relationship to the General Plan

The General Plan, adopted in 2008, did not change the Community Plan land use designations or zoning on individual properties, but rather provided policy direction for future CPUs, discretionary project review, and implementation programs. The General Plan provided the Citywide vision and comprehensive policy framework for how the City should grow and develop, provide public services, and maintain the qualities that define the City as a whole.

The proposed CPU would build upon the goals and strategies in the General Plan. The proposed CPU is intended to further express General Plan policies through the provision of community specific recommendations and policies that implement Citywide goals and policies at the Community Plan level and address community needs. The General Plan and Community Plan work together to establish the policy framework for growth and development in the proposed CPU area. The Land Development Code (LDC) within the SDMC implements the Community Plan policies and recommendations through zoning and development regulations, including the Old Town San Diego Plan District Ordinance. Specific General Plan policies are referenced within the proposed CPU to emphasize their relevance and applicability in the Old Town community. This PEIR provides analysis and evaluation of all relevant land use and environmental issues associated with the project.

3.3 Project Objectives

The following specific objectives for the proposed CPU support the underlying purpose of the project, assist the City as lead agency in developing a reasonable range of alternatives to evaluate in this PEIR, and will ultimately aid the lead agency in preparing findings and overriding considerations, if necessary. The primary goals, recommendations, and objectives of the project are as follows:

- Maintain and enhance the pre-1872 community character of Old Town through land use and urban design policies and development regulations;
- Enhance the Core Sub-District as the pedestrian-oriented commercial center of the community;

- Improve the integration between the Core Sub-District and Old Town San Diego State Historic Park;
- Maintain a balance between visitor-serving uses and residential uses;
- Increase the availability of housing in proximity to transit;
- Enhance facilities and amenities within parks and recreation sites in the community;
- Improve pedestrian and bicycle linkages to adjacent communities and amenities including the San Diego River and Old Town Transit Center;
- Preserve the community's historical, archaeological, and tribal cultural resources; and
- Identify future alternative uses for the Fremont School/Ballard Parent Center site.

3.4 Project Description

The project includes the comprehensive update to the 1987 adopted Community Plan, which is intended to guide development through 2035. For facility planning, technical evaluation, and environmental review purposes, this level of development is expected to occur by 2035. The land use is analyzed ~~at build-out using a total dwelling unit yield for a maximum projection. This is based on the assumption. The total dwelling unit yield reflects assumptions~~ that some properties would ~~not~~ redevelop at ~~the greater density while others will be developed~~ the maximum permitted residential density; other properties would develop at residential densities below the maximum due to development constraints and market conditions; and other sites may develop with a ~~higher~~ density ~~above maximum~~ as permitted under state and local density bonus regulations. ~~The maximum projection for residential density is utilized because the required infrastructure (streets and utilities) is in place and documented development reflects maximum development potential due to the cost of land and the demand for housing.~~

The proposed CPU provides detailed policy direction to implement the General Plan with respect to the distribution and arrangement of land uses (public and private), the local street and transit network, prioritization and provision of public facilities, community-wide and site-specific architectural and urban design guidelines, and recommendations to preserve and enhance natural open space and historic and cultural resources within the Old Town community.

The Old Town community is characterized by its significant historical importance for the City of San Diego. Old Town is a historic and cultural destination for visitors, as well as a neighborhood incorporating residential, commercial, and institutional uses.

The guiding principles for the proposed CPU include the vision for Old Town as an attractive, vibrant, and healthy community that respects the importance of Old Town San Diego as the site of initial settlement in the City and the birthplace of the State of California. The proposed CPU also envisions the community as a pedestrian-oriented historical small town, and provides policy direction that new buildings and uses enhance the community character and livability, with an emphasis on design that respects the history of the community and encourages pedestrian activity. The proposed CPU identifies the need for a community with a balance of residential and visitor-serving uses. The proposed CPU identifies that the

community's mix of pedestrian-oriented residential, commercial, and public space served by the Old Town Transit Center is consistent with the "City of Villages" General Plan concept.

The proposed CPU is a component of the City's General Plan as it expresses the guiding principles, goals, and policies contained within the 10 elements of the General Plan through the provision of more refined, community-specific recommendations. Technical and planning documents have been prepared and considered in the development of the proposed CPU, including previous planning and land use documents, redevelopment plans, visioning plans, and technical documents addressing a range of issues. The proposed CPU contains a plan land use map, mobility network map, and urban design guidelines that will guide future public and private development in the community, as well as policy guidance on historic preservation, land use; mobility; urban design; economic prosperity; public facilities, services, and safety; recreation, conservation; and noise.

While the proposed CPU sets forth procedures for their implementation, it does not establish regulations or legislation, nor does it, on its own, rezone property. Controls on development and use of public and private property, including zoning, design controls, and implementation of transportation improvements, are included as part of the implementation programs for the proposed CPU, which includes the Old Town San Diego Plan District Ordinance, and considered part of the proposed CPU.

The proposed CPU includes an Introduction and Implementation chapter, and includes the following elements: Historic Preservation; Land Use; Mobility; Urban Design; Economic Prosperity; Public Facilities, Services and Safety; Recreation; Conservation; and Noise. Chapter 11 (Implementation) of the proposed CPU describes potential financing methods for public improvement projects. Each element of the proposed CPU is described below.

3.4.1 Community Plan Elements

3.4.1.1 Historic Preservation Element

The goals of the proposed CPU Historic Preservation Element include identifying and preserving significant archaeological tribal and historical resources in Old Town San Diego and identifying education opportunities and incentives related to those resources. The Historic Preservation Element also includes a summary of the prehistoric and historic development of the Old Town San Diego community that details the Native American population of the area, as well as the extensive historic occupation as the first Spanish Presidio and Mission settlements. As such, the cultural sensitivity level for the community is considered high. Through the Historic Survey Report prepared for the proposed CPU, 22 properties were identified as potential new, eligible historic resources as well as one potential historic district. Further research and analysis would determine if, in fact, these properties are significant and eligible for designation but are protected and preserved to some degree through existing General Plan policies and historical resource regulations and guidelines of the SDMC. Specific policies are also included to support educational opportunities and incentives by incorporating historic markers, working with businesses and organizations to create and promote new marketing and heritage tourism programs, and installing public art and other features to commemorate the character and historical value of the community. The Historic Preservation Element is contained within Chapter 2 of the proposed CPU.

3.4.1.2 Land Use Element

The Land Use Element establishes the land use framework for the Old Town San Diego community and defines the distribution of proposed land uses on a map. The land use framework for the proposed CPU is depicted on the proposed Community Plan land use map (Figure 3-1). The map designates the proposed general location, distribution, residential density, and extent of land uses. The proposed CPU plan land use classifications are consistent with the General Plan.

The land use plan locates the highest residential density mixed land uses near the Old Town Transit Center where mixed-use development can support existing and planned transit investments. Residential density is proposed to be increased from the adopted Community Plan. The proposed CPU will allow an increase in future housing units by 2035 when compared to the adopted Community Plan.

Community Plan land use designations that would be applied within the proposed CPU area are described below. Future development within each land use designation would be subject to the proposed CPU policies applicable to each designation. Table 3-2 provides a summary of land use designations within the proposed CPU area and permitted densities.

General Plan Land Use	Community Plan Designation	Density Range (dwelling units/acre)	Floor Area Ratio (FAR)
Residential	Residential – Low	5–9	0.6
	Residential – Low Medium	10–15	0.6
	Residential – Medium	16–25	0.6
	Residential – Medium High	30–44	1.2
Commercial, Employment, Retail, and Services	Community Commercial – Residential Prohibited	N/A	1.0
	Community Commercial – Residential Permitted	0–25	0.6 ^{1,2}
Multiple Use		Mixed Commercial Residential	0–36
	0–25		0.6 ²
	0–54		1.5
Institutional	School/Institutional	0–73	1.5
		None	0.6 ³
Park, Open Space, and Recreation	Parks	None	N/A

N/A = not applicable

¹ A maximum FAR of 0.8 in mixed commercial/residential projects

² A maximum FAR of 1.0 within the Hortensia Sub-District

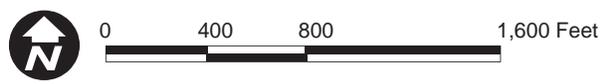
³ Only applicable for non-government constructed facilities

Source: City of San Diego 2017



- Legend**
- Community Plan Boundary
 - Yellow diamond: Residential - Low (5-9 du/ac)
 - Light yellow diamond: Residential - Low Medium (10-15 du/ac)
 - Brown diamond: Residential - Medium (16-25 du/ac)
 - Purple diamond: Residential - Medium High (30-44 du/ac)
 - Pink diamond: Mixed Commercial Residential (0-25 du/ac)
 - Dark purple diamond: Mixed Commercial Residential (0-54 du/ac)
 - Dark purple diamond: Mixed Commercial Residential (0-73 du/ac)
 - Red diamond: Community Commercial - Residential Prohibited
 - Red diamond: Community Commercial - Residential Permitted (0-25 du/ac)
 - Orange diamond: Community Commercial - Residential Permitted (0-36 du/ac)
 - Green diamond: Institutional
 - Light green diamond: Park - State
 - Dark green diamond: Park - County
 - Dark green diamond: Park - City

Transit Center



**Figure 3-1
Proposed Land Use Map**

a. Land Use Designations

The Community Plan land use designations are indicated on the proposed land use maps and are differentiated by color. The land use designations are described below.

Residential

Residential – Medium High

Residential – Medium–High allows for multi-family housing within a medium-high density range (30 to 44 dwelling units per acre [du/ac]).

Residential – Medium

Residential – Medium allows for both single-family and multi-family housing within a medium density range (16 to 25 units du/ac).

Residential – Low Medium

Residential – Low–Medium provides for both single-family and multi-family housing within a low-medium density range (10 to 15 du/ac).

Residential – Low

Residential – Low provides for both single-family and multi-family housing within a low density range (5 to 9 du/ac).

Commercial and Employment

Community Commercial

Community Commercial focuses on commercial uses and provides for shopping areas with retail, service, civic, visitor, and office uses for the community without residential uses. Within Old Town San Diego, these commercial uses also attract visitors within and outside of the region. Public and community gathering spaces are also allowed.

Residential Prohibited: Does not allow for residential uses.

Residential Permitted: Allows for residential use between 0-25 du/ac and 0-36 du/ac as part of a mixed-use development.

Mixed Commercial Residential

The mixed commercial residential designations provide opportunities for infill development to create multiple-use areas. Single-use commercial, residential with ground floor shopkeeper units, or mixed residential and commercial use development is allowed with residential densities between 0-25 du/ac, 0-54 du/ac, and 0-73 du/ac.

Institutional and Public/Semi-Public Facilities

Institutional

The Institutional designation provides for uses that are identified as public or semi-public facilities in the proposed CPU, including but not limited to, schools, government offices, and places of worship.

Parks

Parks – City

The Parks – City land use designation includes population-based parks that provide for passive and/or active recreational uses, such as community parks, neighborhood parks, and recreation centers to meet the recreational needs of the community as defined by the future Recreation Element. Population-based parks (commonly known as Neighborhood and Community parks), facilities, and services are intended to serve the daily needs of the neighborhood and community. When possible, they adjoin schools in order to share facilities, and ideally are within walking distance of the residences within their service area. This land use designation also includes City-owned resource-based parks that serve the City as a whole.

Parks – County

The Parks – County land use designation identifies parks that are owned by the County of San Diego. These parks are under the County's land use jurisdiction as long as they serve a public function. The Land Use Element includes policies that provide recommendations for the County-owned parks in the proposed CPU area.

Parks – State

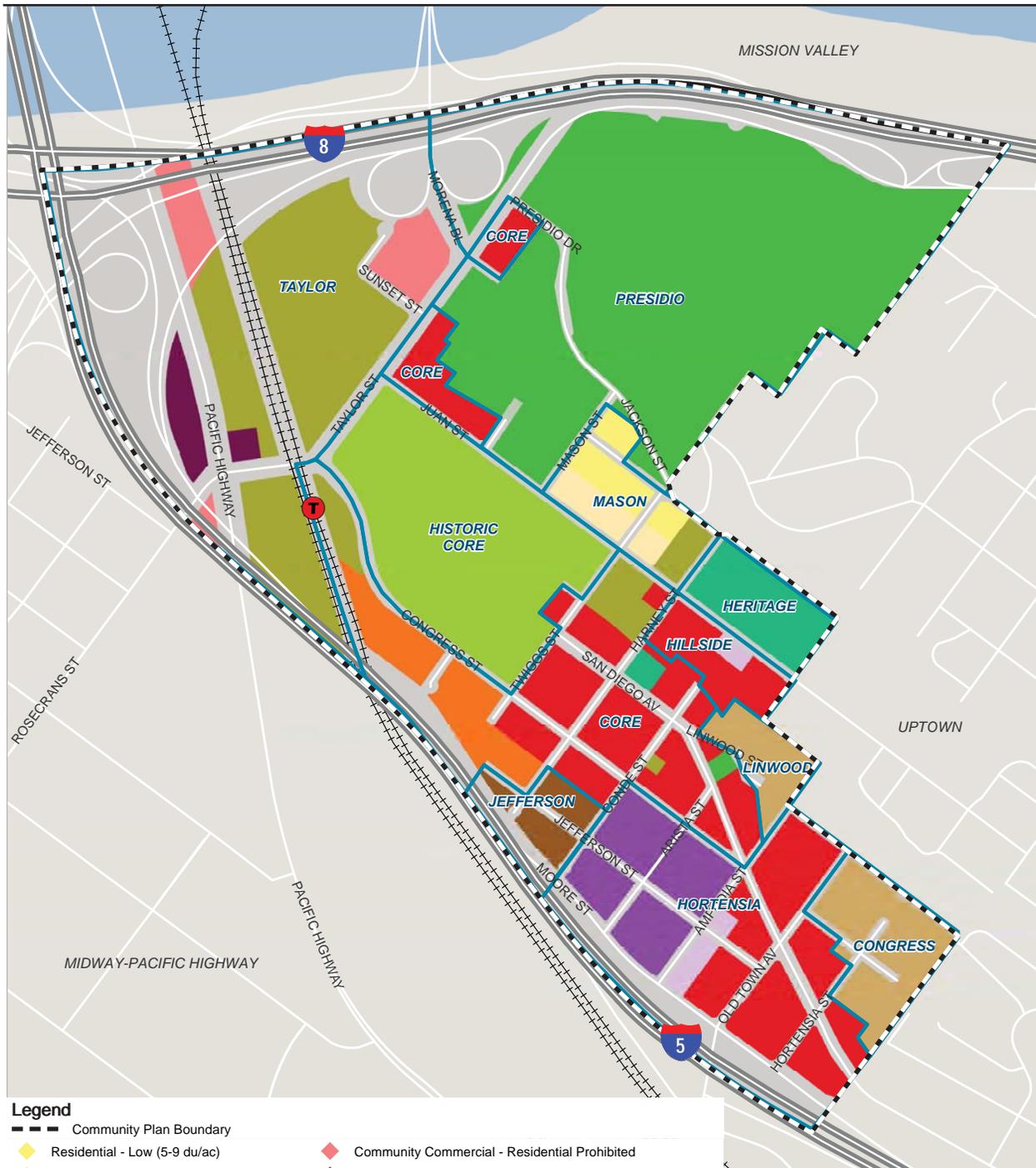
The Parks – State land use designation identifies parks that are owned by the State of California. These parks are under the State's land use jurisdiction. The Land Use Element includes policies that provide recommendations for the State parks in the proposed CPU area.

b. Sub-Districts

The proposed CPU identifies sub-districts based on their existing uses and character. The Community Plan provides a vision and policies for each sub-district to help guide improvements and development that enhance the existing uses and support the community's historic character. Refer to Figure 3-2 for the location of community sub-districts.

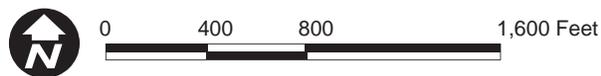
Presidio Sub-District

The Presidio Sub-District includes Presidio Park and Presidio Community Park, and is envisioned to be maintained and enhanced as a regional park with historical, cultural, and open space resources, as well as active recreation uses within the Community Park and golf course. The proposed CPU also envisions the enhancement of pedestrian connections from the Old Town Transit Center and Old Town San Diego State Historic Park to the Presidio Sub-District to improve access and connectivity.



Legend

- Community Plan Boundary
- Residential - Low (5-9 du/ac)
- Residential - Low Medium (10-15 du/ac)
- Residential - Medium (16-25 du/ac)
- Residential - Medium High (30-44 du/ac)
- Mixed Commercial Residential (0-25 du/ac)
- Mixed Commercial Residential (0-54 du/ac)
- Mixed Commercial Residential (0-73 du/ac)
- Community Commercial - Residential Prohibited
- Community Commercial - Residential Permitted (0-25 du/ac)
- Community Commercial - Residential Permitted (0-36 du/ac)
- Institutional
- Park - State
- Park - County
- Park - City
- T Transit Center



**Figure 3-2
Proposed Community Sub-Districts**

Historic Core Sub-District

The Historic Core Sub-District consists of Old Town San Diego State Historic Park and is envisioned as a thriving pedestrian destination that preserves and celebrates the historic and multicultural identity and traditions inherent to Old Town.

Core Sub-District

The Core Sub-District serves as the center of Old Town, providing retail, cultural, entertainment, dining, and visitor-oriented uses, as well as residential uses in mixed-use development. The proposed CPU envisions reestablishing a stronger connection to the Old Town San Diego State Historic Park to create a sense of continuity along the historical main street commercial area of San Diego Avenue.

Hortensia Sub-District

The Hortensia Sub-District is the southern gateway to the proposed CPU area and includes the Ballard Parent Center/Fremont School site. It is envisioned as a mix of hotel, office, and residential uses. The vision for the Hortensia Sub-District also includes the enhancement of non-historical commercial buildings and new buildings to be consistent with Old Town's historical character.

Heritage Sub-District

The Heritage Sub-District consists of the County of San Diego's Heritage Park. The park is dedicated to the preservation of San Diego's Victorian architecture and consists of relocated Victorian buildings along a passive park with lawn and picnic areas. The proposed CPU envisions the continuation and enhancement of the park use within the Heritage Sub-District.

Taylor Sub-District

The Taylor Sub-District is envisioned as a mix of residential, hotel, commercial, and institutional uses in proximity to the transit center, as well as visitor-oriented parking in support of the Historic Core and Core Sub-Districts.

Residential Sub-Districts

The Residential Sub-Districts are the Jefferson, Linwood, Congress, and Mason Sub-Districts, which are predominantly residential in use. The Community Plan envisions maintaining the residential character of each of the four residential sub-districts.

Hillside Sub-District

The Hillside Sub-District, located adjacent to the Core and Heritage Sub-Districts, is envisioned as an area with hotel and visitor-oriented commercial uses and residential uses.

3.4.1.3 Mobility Element

The proposed CPU Mobility Element provides direction on how to achieve mobility goals through a balanced, multi-modal transportation network in the Community Plan area. This element is closely linked

to the Land Use and Urban Design elements. The Mobility Element describes existing and future conditions related to streets, vehicles, and parking, as well as bicycles, pedestrians, and public transit, including recommended mobility improvements to achieve adequate capacity and improved access.

The proposed CPU identifies specific policies applicable to pedestrians, bicycling, and transit and identifies priority routes for each mode. The mobility vision for Old Town is to maintain the existing grid network of streets while enhancing the pedestrian and bicyclist environment to improve the public realm and strengthen connections between visitor destinations, parks, the Core, the Old Town Transit Center, and the San Diego River Park. Existing (2017) and planned roadway classifications for the proposed CPU area are shown in Figure 3-3. The proposed CPU maintains the existing street classifications.

Parking is also addressed within the proposed CPU. The Community Plan supports an increased parking supply located on the periphery of the community to support a pedestrian-friendly environment and coordinate loading and unloading of tour/coach buses. The use of parking management and supply strategies for visitor-oriented parking are also included to help reduce the number of vehicles searching for parking within the Core. The Mobility Element is contained within Chapter 4 of the proposed CPU.

3.4.1.4 Urban Design Element

The proposed CPU Urban Design Element describes community character and provides goals and policies related to architectural building, site, and streetscape design to accurately reflect the architectural period characteristic of Old Town San Diego prior to 1871 and ensure compatibility with Old Town's existing historical character, as well as a system of gateways and wayfinding. This element presents the proposed architectural design and urban form of the Community Plan area and highlights opportunities for urban design in the community. The Urban Design Element is contained within Chapter 5 of the proposed CPU.

3.4.1.5 Economic Prosperity Element

The proposed CPU Economic Prosperity Element supports the continuation, improvement, and expansion of the cultural heritage and tourism industry and related businesses by implementing land use policies, urban design guidance, and mobility improvement policies related to access to transit and visitor parking. This element also identifies the value of hotel and visitor uses, special events, retail goods and service uses, and office uses. The Economic Prosperity Element is contained within Chapter 6 of the proposed CPU.

3.4.1.6 Public Facilities, Services, and Safety Element

The proposed CPU Public Facilities, Service, and Safety Element identifies public facilities and services intended to serve existing and future residents, including educational facilities, public safety services, and infrastructure systems. This element provides policies regarding police, fire, and rescue services; education and public libraries; utilities; maintenance, landscaping, and lighting; water and sewer infrastructure; and health and safety. The Public Facilities, Services, and Safety Element is contained within Chapter 7 of the proposed CPU.

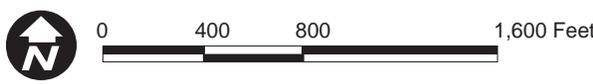
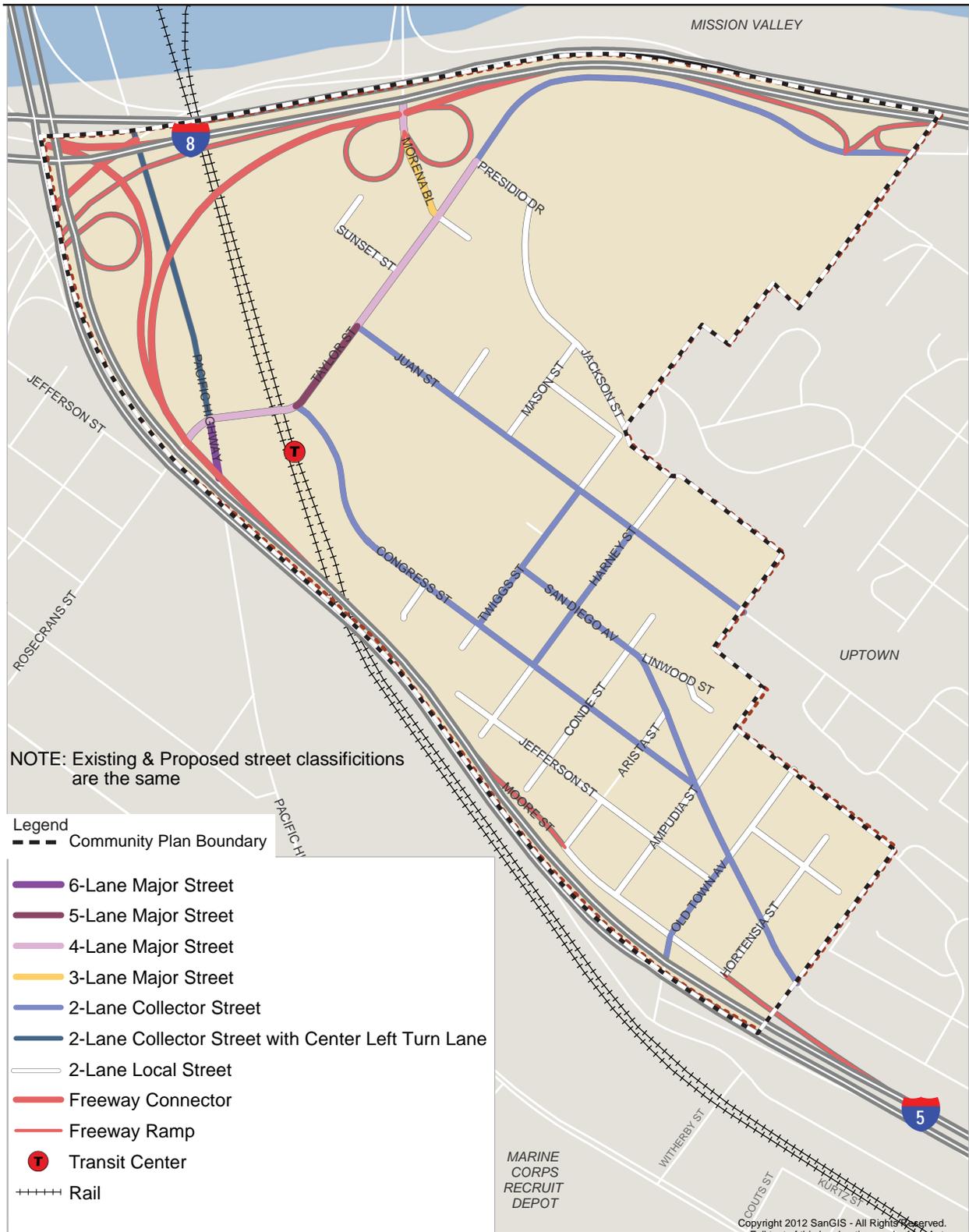


Figure 3-3
Existing and Planned Street Classifications

3.4.1.7 Recreation Element

The proposed CPU Recreation Element aims to provide population-based park and recreation facilities that capitalize on the community's location, history, and walkability. The resource-based Presidio Park, County of San Diego's Heritage Park, and the Old Town San Diego State Historic Park are major visitor-serving parks for the community and the San Diego Region that contain important historic landmarks and are not counted toward Old Town's population-based parks total acreage. Policies within the proposed CPU are centered on providing improvements to existing City-owned, population-based parks to enhance recreational value. The proposed CPU also recommends improvements to existing trails within Presidio Park to provide additional recreational opportunities and add additional population-based parkland. The proposed CPU also incorporates policy direction to provide shared aquatic complexes at Liberty Station and in the communities of Midway-Pacific Highway or Peninsula to serve the Old Town, Midway-Pacific Highway, Peninsula, and Ocean Beach communities. The Recreation Element is contained within Chapter 8 of the proposed CPU.

3.4.1.8 Conservation Element

The proposed CPU Conservation Element provides goals and policies to effectively manage, preserve, and enhance natural resources in the community. The element addresses sustainable development, urban runoff management, and air quality. This element supports sustainability through policies and land use guidance that provide for reduced GHG emissions, the promotion of car and bicycle sharing programs, and the continued use or adaptive reuse of buildings. Strategies included in the Conservation Element address LID practices and ways to reduce the potential health effects of air pollution by incorporating building features into new residential buildings located within 500 feet of the outside freeway travel lane. The Conservation Element is contained within Chapter 9 of the proposed CPU.

3.4.1.9 Noise Element

The proposed CPU Noise Element provides goals and policies addressing noise compatibility, including commercial, traffic, rail, and event noise, and supports the establishment of a train horn "quiet zone" at the Taylor Street at-grade rail crossing as an interim measure to roadway-rail grade separation to address train noise. The Noise Element is contained within Chapter 10 of the proposed CPU.

3.4.1.10 Implementation

The proposed CPU includes an Implementation chapter that describes future actions that would implement the Community Plan. Chapter 11 of the proposed CPU contains more detailed information on future implementation actions.

3.4.2 Land Development Code Amendments

3.4.2.1 Old Town San Diego Planned District Ordinance

The implementation program for the proposed CPU includes amendments to Chapter 15, Article 16 of the SDMC (Old Town Planned District Ordinance) to revise the existing ordinance to be consistent with the land use plan and policies set forth in the proposed CPU. The Old Town Planned District Ordinance

(PDO) is intended to retain, replicate, and enhance the distinctive character of the Old Town San Diego historic area that existed prior to 1871 and implement the Old Town Community Plan. Revisions to the PDO would include:

- Revised development review processes for future projects that are intended to help retain the historical character of the community;
- New zone naming convention that more closely mirrors the Citywide zones;
- Architectural styles, now named periods, would be retained; however, building color would also be regulated based on the proposed architectural period;
- A maximum building height of three stories and relying solely on FAR, not lot coverage, for development regulations;
- New sign regulations, revised to be more historically accurate and clearer; and
- Removal of the standard regarding rehabilitations and additions that requires a minimum of twice the number of parking spaces necessitated by the size of the enlargement. All other parking regulations would be retained.

3.4.2.2 New Parking and Sign Requirements

The implementation program for the proposed CPU also includes amendments to Chapter 14, Article 2 of the SDMC to revise the current sign requirements applicable to development within the proposed CPU to be consistent with the policies set forth in the proposed CPU. Also, included in the project is an amendment to SDMC Chapter 13, Article 2, Division 9 to apply the Residential Tandem Parking Overlay Zone to the proposed CPU area as a whole.

3.4.3 Impact Fee Study

The project includes adoption of an Impact Fee Study (IFS), formerly known as a Public Facilities Financing Plan (PFFP), that addresses the need for public facilities associated with the identified needs of the proposed CPU area. City Council adopted the current PFFP in 2003. The existing PFFP sets forth the major public facilities needs in the areas of transportation (streets, sidewalks, storm drains, traffic signals, etc.) and fire stations necessary to serve the community as of 2003. The proposed IFS for Old Town would be used to determine the public facilities needs associated with the proposed CPU area. It includes potential funding sources for public facility financing, particularly development impact fees.

The IFS identifies and prioritizes improvements to public facilities. Improvements 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. A complete list of projects is included in the proposed IFS.

3.5 Environmental Design Considerations

Several environmental design considerations, beyond compliance with mandatory existing regulations, have been incorporated into the proposed CPU as recommendations within policies to avoid or reduce environmental impacts. These are described below.

3.5.1 Sustainability

Sustainable building concepts and practices have been incorporated into the proposed policies within various elements of the proposed CPU. Implementation of these policies will serve to reduce or avoid potential environmental effects associated with GHG emissions, energy and water use, and new development.

3.5.2 Sub-Districts and Proximity to Transit

Development completed in accordance with the proposed CPU would occur in an existing urbanized area with established public transportation infrastructure, including existing and future transit service. Most future development is expected to occur within half a mile or less of the Old Town Transit Center, which may reduce vehicle trips and miles traveled. In addition, implementation of the policies contained in the Land Use, Mobility, and Urban Design elements of the proposed CPU would improve walkability and bicycle connections generally within the community and to transit.

3.5.3 Transit

The intent of the proposed CPU Mobility Element is to maintain and enhance the transit-rider experience through the installation of transit stop amenities, including additional shelters, seating, lighting, paving, and landscaping consistent with the architectural period characteristic of Old Town San Diego prior to 1871. Policies include coordination with SANDAG, MTS, and MTSNCTD to support and incorporate transit infrastructure and service enhancements and ensure accessibility and compatibility between transit operations and private and public development and infrastructure projects.

3.5.4 Recreation

The proposed CPU Recreation and Land Use elements contain policies aimed at preserving, protecting, and enhancing the integrity and quality of parks and recreation programs in Old Town San Diego by capitalizing on the community's location, history, and walkability.

3.5.5 Urban Runoff/Water Quality

Urban runoff management policies located in the proposed CPU Conservation and Urban Design elements seek to reduce potential runoff/water quality impacts by incorporating LID practices into building design and site plans that work with the natural hydrology of a site to reduce runoff, incorporating and maintaining storm water BMPs in public infrastructure and private development projects, and minimizing reliance on storm drains.

3.5.6 Diversity and Affordability of Housing

The land use plan for the proposed CPU encourages the development of housing of a variety of types and affordability levels in a manner that reinforces the pre-1871 community character. The proposed CPU Land Use Element contains a policy related to encouraging the inclusion of affordable housing in the Hortensia Sub-District.

3.5.7 Bicycle Network

To reduce reliance on fossil fuels and encourage alternative modes of transportation, the proposed CPU aims to provide a safe and convenient bicycle network that connects community destinations and links to surrounding communities and the regional bicycle network. In support of this goal, bicycle policies are included in Section 4.2 of the Mobility Element of the proposed CPU. Specifically, policies in this element would provide bicycle connections between historical and cultural attractions, the Old Town Transit Center, the regional bicycle network, and the San Diego River Park.

3.5.8 Pedestrian-Oriented Building and Site Design

The proposed CPU supports pedestrian-oriented and outdoor-focused building design and public and semi-public gathering places that enhance livability and pedestrian activity, such as indoor-outdoor eating areas or an outdoor market. The Urban Design Element of the proposed CPU addresses creating pedestrian-oriented buildings that involve enhancing the streetscape and the building's interface with the street by providing greater building transparency to highlight ground-floor active uses along primary pedestrian corridors, such as San Diego Avenue and Congress Street.

3.5.9 Improved Transportation Network and Increased Alternative Modes of Transportation

The proposed CPU includes several policies intended to improve the existing transportation network, as well as encouraging alternative modes of transportation to reduce impacts related to traffic/circulation and air quality. The proposed Mobility Element would support and help implement the General Plan at the Community Plan-level by including specific policies and recommendations that will improve mobility through the development of a balanced, multi-modal transportation network. Specifically, the Mobility Element includes policies addressing walkability that would promote and encourage new construction and upgrades to existing pedestrian pathways. Transit policies of the proposed Mobility Element would support pedestrian and bicycle connectivity to the Old Town Transit Center; Intelligent Transportation System policies would self-adjust traffic signals during peak traffic hours and incorporate smart parking technologies; and bicycle mobility policies would promote a safe, comfortable, and well-connected bicycle network to make bicycling an attractive mode of transportation. The Urban Design Element includes streetscape enhancements along streets in the community to improve the pedestrian and bicyclist environment to strengthen linkages.

3.5.10 Energy Efficiency in Buildings

The Conservation Element of the proposed CPU includes policies that promote adaptive reuse of the buildings and encourage commercial energy- and water-efficient measures. The Conservation Element policy CE-1.5 aims to increase energy efficiency through adaptive reuse of buildings, and policy CE-1.8 encourages energy and water efficient machinery for laundry operations, energy- and water-efficient kitchens in restaurants, and storefront shading. The Urban Design Element of the proposed CPU also includes policies that encourage development to incorporate energy- and water-efficient building and site features.

3.5.11 Air Quality

The Conservation Element includes policies to reduce the proposed CPU's impact on air quality. The Conservation Element includes Air Quality policy CE-3.1, which would encourage the incorporation of building features into new residential buildings located within 500 feet of the freeway to reduce effects of air pollution. The Conservation Element also includes policy CE-3.2, which would encourage Caltrans to plant trees in landscaped areas in Caltrans right-of-way adjacent to I-5 and I-8 to assist in air pollution mitigation.

3.5.12 Urban Forestry and Landscaping

Policies in Section 5.6, Urban Forestry and Landscaping, of the Urban Design Element of the proposed CPU incorporate landscaping reflective of Old Town's character for aesthetic and environmental benefits, and prioritize the selection of native and drought-tolerant plant species. Other policies aim to preserve existing mature trees wherever possible and maximize the use of landscaping to provide shade and passive cooling to buildings.

3.6 Plan Projections

Future development realized under the proposed CPU Land Use Map is referred to as build-out. The proposed CPU does not specify or anticipate when build-out would occur, as long-range demographic and economic trends are difficult to predict. However, for facility planning, technical evaluation, and environmental review purposes for this PEIR, build-out is assumed to occur in 2035, and future land use assumptions for the proposed CPU area have been made.

3.6.1 Old Town Land Use Distribution

Table 3-3 shows the amount of area for existing and future land uses at build-out according to future land use assumptions and analysis undertaken for the proposed CPU. The assumptions were developed based on the draft community plan vision, land use map, and policies, and on market demand, existing conditions, and constraints. The predominant land use in Old Town would remain transportation (roads) and parks/open space, with transportation acreage at approximately 94 acres and parks/open space comprising approximately 66 acres. Overall, implementation of the project is anticipated to result in multi-family development at higher densities allowing mixed- use residential development with office commercial and retail commercial land uses.

Land Use	Existing Development		Proposed CPU	
	Acres	Percent	Acres	Percent
Retail Commercial	13.0	4.7%	25.8	9.4%
Communications and Utilities	0.9	0.3%	0.9	0.3%
Hotel	10.4	3.8%	10.4	3.8%
Institutional	6.8	2.5%	2.4	0.9%
Military	2.9	1.1%	-	0.0%
Office	25.0	9.1%	23.9	8.7%
Parking Lot	5.4	2.0%	2.7	1.0%
Parks and Open Space	65.7	23.9%	65.7	23.9%
Residential - Multi Family	12.0	4.4%	15.8	5.8%
Residential - Single Family	8.9	3.2%	5.0	1.8%
Self-Storage	0.4	0.1%	0.4	0.1%
Tourist Attraction	19.5	7.1%	22.7	8.3%
Transit Center	4.9	1.8%	4.9	1.8%
Transportation	94.4	34.4%	93.7	34.1%
Undevelopable Natural Area	0.4	0.1%	0.4	0.1%
Vacant Building	2.5	0.9%	-	0.0%
Vacant Land	1.5	0.5%	-	0.0%
Total	274.6	100.0%	274.7	100.0%

Source: City of San Diego 2017

Table 3-4 shows the existing and future residential development at build-out anticipated from application of land uses shown on the proposed Old Town Land Use Map, according to future land use assumptions and analysis undertaken for the proposed CPU. Table 3-5 shows the same for existing and future non-residential development.

Residential Development	Existing Development		Proposed CPU		Difference	
	Residential Units	Percent of Total	Residential Units	Percent of Total	Change	Change (%)
Single-Family Units	96	20%	79	6%	(17)	(18%)
Multi-Family Units ¹	378	80%	1,326	94%	948	251%
Total Housing Units	474	100%	1,405	100%	931	196%
Household Population	830	-	2,430	-	1600	193%

Note: ¹Includes residential units in mixed-use development.

Non-Residential Development	Existing Development		Proposed CPU		Difference	
	Non-Residential Building (square feet)	Percent of Total	Non-Residential Building (square feet)	Percent of Total	Change	Change (%)
Retail Commercial	269,220	19.5%	399,400	27.5%	130,180	48.4%
Hotel	329,376	23.9%	394,575	27.2%	65,199	19.8%
Institutional	86,359	6.3%	45,620	3.1%	(40,739)	(47.2%)
Military	56,359	4.1%	0	0.0%	(56,359)	(100.0%)
Office	590,367	42.9%	565,730	39.0%	(24,637)	0.0%
Parks and Open Space	7,114	0.5%	7,114	0.5%	0	0.0%
Self-Storage	20,000	1.5%	20,000	1.4%	0	0.0%
Tourist Attraction	15,029	1.1%	15,029	1.0%	0	0.0%
Transit Center	3,882	0.3%	3,882	0.3%	0	0.0%
Total Non-Residential Development	1,377,706¹	100.0%	1,451,350	100.0%	73,646	5.3%

¹ Existing Development total excludes SF of Vacant Building land use (Former Caltrans building, 190,523 SF)

3.6.2 Future Actions Associated with the Proposed CPU

Due to the nature of an amendment to a community plan and a lack of site-specific development proposals associated with the proposed CPU, site-specific environmental analyses of future development anticipated within the proposed CPU area are not undertaken within this PEIR. However, the analysis anticipates that future development would occur within the proposed CPU area and would be subject to applicable development regulations and requirements of the proposed CPU and this PEIR. Future development within the proposed CPU area would involve subsequent approval of public and private development proposals through both ministerial and discretionary reviews in accordance with the zoning and development regulations, and proposed CPU policies. These subsequent activities may be public (i.e., mobility/streetscape improvements, parks, public facilities) or private projects, and are referred to as future development or future projects in the text of the PEIR. A non-inclusive list of discretionary actions that would occur as the proposed CPU is implemented is shown on Table 3-6.

Table 3-6 Potential Future Discretionary Actions Associated with the Proposed CPU	
City of San Diego	
<ul style="list-style-type: none"> • Subdivision Maps • Discretionary Permits <ul style="list-style-type: none"> ○ Neighborhood Use Permits ○ Neighborhood Development Permits ○ Site Development Permits ○ Conditional Use Permits ○ Planned Development Permits • Variances • Street Vacations, Release of Irrevocable Offers of Dedication, and Dedications • Water sewer, and storm drain infrastructure and road improvements (Public Right-of-Way Permits) • Establishment of Impact Fee Study (formerly Public Facilities Financing Plan) Mechanisms 	
State of California	
<ul style="list-style-type: none"> • Caltrans Encroachment Permits • Section 1602/1603 Streambed Alteration Agreements • Water Quality Certification Determinations for Compliance with Section 401 	
Federal Actions	
<ul style="list-style-type: none"> • U.S. Army Corps of Engineers Section 404 Permits • USFWS Section 7 or 10 (a) 	
Other Agencies	
<ul style="list-style-type: none"> • SDG&E/Public Utilities Commission approvals of power line relocations or undergrounding 	



Chapter 4.0

Regulatory Framework

The regulatory framework applicable to each subject area included within this PEIR is included in this chapter.

4.1 Land Use

Included within Chapter 3.0, Project Description, of this PEIR are descriptions of the adopted Old Community Plan (1987) that currently applies to the proposed CPU area. The following expands the discussion of applicable plans and development regulations, including the General Plan, pertinent SDMC regulations, the City's MSCP Subarea Plan, and the ALUCP.

4.1.1 Local

a. City of San Diego General Plan

A comprehensive update of the City's General Plan was adopted in 2008, incorporating the City of Villages strategy, which in turn was developed and adopted as part of the Strategic Framework Element in 2002. The Strategic Framework Element represented the City's new approach for shaping how the City will grow while attempting to preserve the character of its communities and its most treasured natural resources and amenities. It was developed to provide the overall structure to guide the General Plan update and future CPUs and amendments, as well as the implementation of an action plan.

Under the City of Villages strategy, the General Plan aims to direct new development projects away from natural undeveloped lands into already urbanized areas and/or areas where conditions allow the integration of housing, employment, civic, and transit uses. It is a development strategy that mirrors regional planning and smart growth principles intended to preserve remaining open space and natural habitat and focus development in areas with available public infrastructure.

The General Plan includes 10 elements intended to provide guidance for future development. These are listed here and discussed in more detail below: (1) Land Use and Community Planning Element; (2) Mobility Element; (3) Urban Design Element; (4) Economic Prosperity Element; (5) Public Facilities, Services, and Safety Element; (6) Recreation Element; (7) Conservation Element; (8) Noise Element; (9) Historic Preservation Element; and (10) Housing Element. The Housing Element, which must be updated every 8 years under state law, was last updated in 2013 and is provided under separate cover due to the need for more frequent updates. It is required to be consistent with the General Plan goals and City of Villages strategy.

Land Use and Community Planning Element

The Land Use and Community Planning Element provides overarching policies to integrate the City of Villages strategy and guides the provision of public facilities while accommodating planned growth. Policies within this element, in combination with other elements, also ensure consistency with zoning regulations (e.g., SDMC).

The Land Use and Community Planning Element of the City's General Plan is largely seen as the structure and framework for developing Community Plans. When appropriate, policies call for Community Plans to further identify appropriate land uses to meet the goals set by the General Plan and City of Villages strategy. The policies also indicate that mixed-use areas, villages, and community-specific policies are developed with public input and involvement.

The Land Use and Community Planning Element contains five goals related to community planning. These goals are to provide:

- Community plans that are clearly established as essential components of the General Plan to provide focus upon community-specific issues.
- Community plans that are structurally consistent yet diverse in their presentation and refinement of Citywide policies to address specific community goals.
- Community plans that maintain or increase planned density of residential land uses in appropriate locations.
- Community plan updates that are accompanied by an updated IFS (formerly known as PFFP).
- Community plans that are kept consistent with the future vision of the General Plan through comprehensive updates or amendments.

Community Plans are important because they contain policies tailored to a community's issues and goals. Future public and private projects will be evaluated for consistency with policies in the Community Plans.

Urban Design Element

The Urban Design Element of the General Plan includes goals and policies that support the creation of transit-focused, walkable village centers; the provision of high-quality public spaces and civic architecture; and the enhancement of the visual quality of office and industrial development. It also includes goals and

policies specific to mixed-use villages and commercial areas and emphasizes the integration of compatible land uses.

Economic Prosperity Element

The Economic Prosperity Element contains policies that are intended to improve the City's economic prosperity. This goal will be accomplished by ensuring that the economy grows in ways that strengthen San Diego industries and create good jobs with self-sufficient wages, increase average income, and stimulate economic investment in the community.

Recreation Element

The Recreation Element contains park and recreation guidelines with the goal of creating a sustainable park and recreation system that meets the needs of residents and visitors. The park and recreation guidelines, found in Tables RE-2 and RE-3, establish park and recreation facility categories, types, and typical components. Recreation Element Policy RE-A.8 states that population-based parks should be provided at a minimum ratio of 2.8 acres per 1,000 residents. As established by the guidelines, a recreation center can serve a population of 25,000 persons and should have a standard size of 17,000 square feet, and an aquatic centers can serve a population of 50,000 persons.

Noise Element

The focus of the Noise Element is to minimize excessive noise effects and improve the quality of life of people working and living in the City. The Noise Element identifies goals and related policies with regard to noise and land use compatibility, motor vehicle traffic noise, and trolley and train noise that are relevant to the proposed CPU. While the Noise Element articulates the City's goals, the enforcement mechanism to control noise is the City's Noise Ordinance, which is discussed in Section 5.5.

b. Land Development Code Regulations

Chapters 11 through 15 of the SDMC are referred to as the LDC, as they contain the City's planning, zoning, subdivision, and building regulations that regulate how land is to be developed within the City. The LDC contains Citywide base zones that specify permitted land use, residential density, FAR, and other development requirements for given zoning classifications, as well as area-specific zoning for planned districts within the City including Old Town, and overlay zones and supplemental regulations that provide additional development requirements. The LDC also contains planned districts within Chapter 15 that provide the means to adopt land use plans for certain areas of the City which provide land use regulations in lieu of conventional base zoning to preserve and enhance the cultural, aesthetic or economic value of older neighborhoods or communities having special importance due to their historical significance.

Development of the proposed CPU area is subject to the development regulations of the LDC.

General Development Regulations

Chapter 14 of the LDC includes the general development regulations, supplemental development regulations, building regulations, and electrical/plumbing/mechanical regulations that govern all aspects of

project development. The grading, landscaping, parking, signage, fencing, and storage requirements are all contained within Chapter 14, General Regulations. Planned Districts refer to the applicable regulations within Chapter 14 or supersede the Chapter 14 regulations unless otherwise specified in Chapter 15. Also included within the general regulations of Chapter 14 are the Environmentally Sensitive Lands (ESL) Regulations, discussed below.

Environmentally Sensitive Lands Regulations

The purpose of the ESL Regulations is to protect, preserve and, where damaged restore, the environmentally sensitive lands of San Diego and the viability of the species supported by those lands (LDC Chapter 14, Article 1, Division 1; City of San Diego 2000). These regulations are intended to assure that development, including, but not limited to coastal development in the Coastal Overlay Zone, occurs in a manner that protects the overall quality of the resources and the natural and topographic character of the area, encourages a sensitive form of development, retains biodiversity and interconnected habitats, maximizes physical and visual public access to and along the shoreline, and reduces hazards due to flooding in specific areas while minimizing the need for construction of flood control facilities. These regulations are intended to protect the public health, safety, and welfare while employing regulations that are consistent with sound resource conservation principles and the rights of private property owners.

Environmentally sensitive lands include sensitive biological resources, steep hillsides, coastal beaches, sensitive coastal bluffs, and special flood hazard areas (SDMC Chapter 14, Article 3, Division 1; City of San Diego 2006). Development on a site containing environmentally sensitive lands requires a Site Development Permit in accordance with Section 125.0502 of the LDC. Future development on environmentally sensitive lands within the proposed CPU area would be subject to the ESL Regulations where steep hillsides and sensitive biological resources occur.

Historical Resources Regulations

The purpose of the City's Historical Resources Regulations is to protect, preserve, and, where damaged, restore the historical resources of San Diego, which include historical buildings, historical structures or objects, important archaeological sites, historical districts, historical landscapes, and traditional cultural properties/tribal cultural resources (SDMC Chapter 14, Article 3, Division 2; City of San Diego 2001b). These regulations are intended to ensure that development occurs in a manner that protects the overall quality of historical resources. These regulations are intended to assure that development occurs in a manner that protects the overall quality of historical resources. It is further the intent of these regulations to protect the educational, cultural, economic, and general welfare of the public, while employing regulations that are consistent with sound historical preservation principles and the rights of private property owners. The Historical Resources Regulations require that development affecting designated historical resources or historical districts shall provide full mitigation for the impact to the resource, in accordance with the Historical Resources Guidelines of the Land Development Manual (LDM), as a condition of approval. If development cannot, to the maximum extent feasible, comply with the development regulations for historical resources, then a project would require a Site Development Permit in accordance with Section 126.0502 of the LDC.

Affordable Housing Density Bonus Regulations

The purpose of these regulations is to provide increased residential density to developers who guarantee that a portion of their residential development will be available to moderate income, low income, very low income, or other noted household types. The regulations are intended to materially assist the housing industry in providing adequate and affordable housing for all economic segments of the community and to provide a balance of housing opportunities throughout the City. These regulations implement the provisions of California Government Code Sections 65915 through 65918. It is intended that the affordable housing density bonus and any additional development incentive be available for use in all residential development of five or more units, using criteria and standards provided in the General Plan as part of this proposed CPU. All requests are required to be processed by the City of San Diego, and implemented by the San Diego Housing Commission.

c. Multiple Species Conservation Program

The MSCP is a comprehensive habitat conservation planning program for San Diego County. A goal of the MSCP is to preserve a network of habitat and open space, thereby protecting biodiversity. Local jurisdictions, including the City of San Diego, implement their portions of the MSCP through subarea plans, which describe specific implementing mechanisms.

The City of San Diego's MSCP Subarea Plan was approved in March 1997. The MSCP Subarea Plan is a plan and process for the issuance of permits under the federal and state ESAs and the California Natural Communities Conservation Planning Act of 1991. The primary goal of the MSCP Subarea Plan is to conserve viable populations of sensitive species and to conserve regional biodiversity while allowing for reasonable economic growth.

In July 1997, the City of San Diego signed an Implementing Agreement (IA) with USFWS and CDFW. The IA serves as a binding contract between the City, USFWS, and CDFW that identifies the roles and responsibilities of the parties to implement the MSCP and subarea plan. The agreement became effective on July 17, 1997, and allows the City to issue Incidental Take Authorizations under the provisions of the MSCP. Applicable state and federal permits are still required for wetlands and listed species that are not covered by the MSCP.

Multi-Habitat Planning Area

The MHPA is the area within which the permanent MSCP preserve will be assembled and managed for its biological resources. Input from responsible agencies and other interested participants resulted in adoption of the City's MHPA in 1997. The City's MHPA areas are defined by "hard-line" limits, "with limited development permitted based on the development area allowance of the OR-1-2 zone [open space residential zone].

Private land entirely within the MHPA is allowed only up to 25 percent development in the least sensitive area per the City's MSCP Subarea Plan. Should more than 25 percent development be desired, an MHPA boundary line adjustment may be proposed. The City's MSCP Subarea Plan states that adjustments to the MHPA boundary line are permitted without the need to amend the City's Subarea Plan, provided the boundary adjustment results in an area of equivalent or higher biological value. To meet this standard, the area proposed for addition to the MHPA must meet the six functional equivalency

criteria set forth in Section 5.4.2 of the Regional MSCP Plan. All MHPA boundary line adjustments require approval by the Wildlife Agencies and the City.

For parcels located outside the MHPA, “there is no limit on the encroachment into sensitive biological resources, with the exception of wetlands, and listed non-covered species’ habitat (which are regulated by state and federal agencies) and narrow endemic species.” However, “impacts to sensitive biological resources must be assessed and mitigation, where necessary, must be provided in conformance” with the City’s Biological Guidelines.

The MSCP includes management priorities to be undertaken by the City as part of its MSCP implementation requirements. Those actions identified as Priority 1 are required to be implemented by the City as a condition of the MSCP Take Authorization to ensure that covered species are adequately protected. The actions identified as Priority 2 may be undertaken by the City as resources permit.

MHPA Land Use Adjacency Guidelines

To address the integrity of the MHPA and mitigate for indirect impacts to the MHPA, guidelines were developed to manage land uses adjacent to the MHPA. The MHPA Land Use Adjacency Guidelines are intended to be incorporated into the MMRP and/or applicable permits during the development review phase of a project. These guidelines address the issues of drainage, toxics, lighting, noise, barriers, invasive species, brush management, and grading/ development.

d. Airport Land Use Compatibility Plan

The San Diego County Regional Airport Authority, serving as the ALUC, is required by state law to prepare an ALUCP for SDIA. The proposed CPU is within the Airport Influence Area (AIA) Review Area 2 for SDIA. The AIA serves as the boundary for the ALUCP. The AIA is divided into two review areas. Review Area 1 is defined by the combination of the 60 dB CNEL noise contour, the outer boundary of all safety zones, and the airspace Threshold Siting Surfaces. All policies and standards in the ALUCP apply within Review Area 1. Review Area 2 is defined by the combination of the airspace protection and overflight boundaries beyond Review Area 1. Only airspace protection and overflight policies and standards apply within Review Area 2.

The ALUCP contains policies and criteria that address land use compatibilities concerning noise and safety aspects of airport operations and land uses, heights of buildings, residential densities and intensities, and the disclosure of aircraft overflight. The adopted ALUCP for SDIA contains policies that limit residential uses in areas experiencing noise above 60 dB CNEL by placing conditions on residential uses within the 60 dB CNEL contour. Residential uses in such areas may require sound attenuation to reduce interior noise levels to 45 dB. Since the ALUC does not have land use authority, the City implements the compatibility plan through land use plans, development regulations, and zoning regulations. The City is required to submit discretionary and ministerial development applications within the AIA for SDIA to the ALUC, until the City adopts regulations implementing the ALUCP and the ALUC determines the City’s zoning, development regulations and land use plans consistent with the ALUCP or the City Council takes action to overrule the ALUC with a 2/3rds vote.

e. San Diego Forward: The Regional Plan (2015 Regional Plan)

SANDAG is the regional planning agency that creates regional-specific documents to provide guidance to local agencies, as SANDAG does not have land use authority. SANDAG's San Diego Forward: The Regional Plan (RP2015 Regional Plan) combines two of the region's existing planning documents: the Regional Comprehensive Plan for the San Diego Region (RCP) and the Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS). The RCP, adopted in 2004, laid out key principles for managing the region's growth while preserving natural resources and limiting urban sprawl. The plan covered eight policy areas, including urban form, transportation, housing, health environment, economic prosperity, public facilities, our borders, and social equity. These policy areas were addressed in the 2050 RTP/SCS and are now fully integrated into the RP2015 Regional Plan.

On April 24, 2015, SANDAG released the draft RP2015 Regional Plan for public comment, with a closing date of July 15, 2015. A final RP2015 Regional Plan was adopted by the SANDAG Board of Directors on October 9, 2015.

4.2 Transportation and Circulation

This section summarizes existing regulations that apply to the transportation system.

4.2.1 State

a. California Public Utilities Commission

CPUC regulates privately owned railroad and rail transit. CPUC staff ensure that highway-rail and pathway-rail crossings are safely designed, constructed, and maintained. The Rail Crossings and Engineering Branch engineers investigate and evaluate requests to construct new rail crossings or modify existing crossings.

b. California Department of Transportation

Caltrans is the primary state agency responsible for transportation issues. One of its duties is the construction and maintenance of the state highway system. Caltrans has established standards for street traffic flow and has developed procedures to determine if intersections require improvements. For projects that may physically affect facilities under its administration, Caltrans requires encroachment permits before any construction work may be undertaken. For projects that would not physically affect facilities but may influence traffic flow and levels of services at such facilities, Caltrans may recommend measures to mitigate the traffic impacts of such projects. In addition, Caltrans must review proposals to signalize any freeway ramp interchanges through their Intersection Control Evaluation process (Caltrans Traffic Operations Policy Directive #13-01).

c. California Transportation Commission (CTC)

The CTC consists of nine members appointed by the California Governor. CTC is responsible for the programming and allocating of funds for the construction of highway, passenger rail, and transit

improvements throughout the state. CTC is responsible for adopting the State Transportation Improvement Program and the State Highway Operation and Protection Program.

d. AB 1358 – California Complete Streets Act of 2008

Supporting some of the previously referenced regulations/requirements, the California Complete Streets Act of 2008 (AB 1358) requires circulation elements as of January 1, 2011, to accommodate the transportation system from a multi-modal perspective, including public transit and walking and biking, which have traditionally been marginalized in comparison to automobiles in contemporary American urban planning.

4.2.2 Local

a. San Diego Forward: The Regional Plan (2015 Regional Plan)

See Section 4.1.5 for discussion of the RP2015 Regional Plan.

b. SANDAG Regional Bike Plan

The Riding to 2050, San Diego Regional Bike Plan adopted by SANDAG supports implementation of the RP-2015 Regional Plan. It provides a regional strategy to make riding a bike a useful form of transportation for everyday travel. The plan will help San Diego meet its goals to reduce GHG emissions and improve mobility. Goals of the Regional Bike Plan include increase levels of bicycling; improve bicycling safety; encourage complete streets; support reductions in emissions; and increase community support. In September 2013, the SANDAG Board of Directors approved funding to implement the Regional Bike Plan Early Action Program, which focuses on the region's highest-priority projects. Priority is chosen in part based on proximity to smart growth areas, taking into account that bikeways would be used more often if they connect high-density activity hubs within a short distance of each other, and on whether a project would fill key gaps in the regional bike networks.

c. City of San Diego General Plan

The Mobility Element of the City of San Diego General Plan defines the policies regarding traffic flow and transportation facility design. The purpose of the Mobility Element is "to improve mobility through development of a balanced, multi-modal transportation network." The main goals of the Mobility Element pertain to walkable communities, transit first, street and freeway system, ITS, ~~TDM~~, Transportation Demand Management (TDM), bicycling, parking management, airports, passenger rail, goods movement/freight, and regional transportation coordination and financing.

d. Old Town Adopted Community Plan Circulation Element

The purpose of the adopted Community Plan Circulation Element is to establish goals and policies to guide future street network and design, street classification, Level of Service (LOS), transit facilities and service, pedestrian and bicycle accommodations, and facility improvements needed to support future travel needs within the Community Plan area. This element would be replaced by the Mobility Element of the proposed CPU if adopted.

e. City of San Diego Bicycle Master Plan (Update December 2013)

The City's Bicycle Master Plan Update (City of San Diego 2013) provides a framework for making cycling a more practical and convenient transportation option for a wider variety of San Diegans with varying riding purposes and skill-levels. The proposed CPU evaluates and builds on the 2002 Bicycle Master Plan so that it reflects changes in bicycle user needs and changes to the City's bicycle network and overall infrastructure.

4.3 Historical and Tribal Cultural and Resources

Federal, state, and local criteria have been established for the determination of historical and tribal cultural resource significance. The criteria for determining a resource's significance generally focuses on a resource's integrity and uniqueness, its relationship to similar resources, and its potential to contribute important information to scholarly research. Some resources that do not meet federal significance criteria may be considered significant under state or local criteria. Additionally, Native American involvement in the development review process is addressed by several federal and state laws. The most notable of these are the California Native American Graves Protection and Repatriation Act (2001) and the federal Native American Graves Protection and Repatriation Act (1990). These acts ensure that Native American human remains and cultural items are treated with respect and dignity.

4.3.1 Federal

a. National Historic Preservation Act of 1966 and National Register of Historic Places

The National Historic Preservation Act of 1966 established the NRHP as the official federal list of cultural resources that have been nominated by state offices for their significance at the local, state, or federal level. Listing in the NRHP provides recognition that a property is historically significant to the nation, the state, or the community. Properties listed (or potentially eligible for listing) in the NRHP must meet certain significance criteria and possess integrity of form, location, or setting. Barring exceptional circumstances, resources generally must be at least 50 years old to be considered for listing in the NRHP.

Criteria for listing in the NRHP are stated in 36 CFR 60. A resource may qualify for listing if there is quality of significance in American history, architecture, archaeology, engineering, and culture present in districts, sites, buildings, structures, and objects that possess integrity of location, design, setting, materials, workmanship, feeling, and association; and where such resources:

- Are associated with events that have made a significant contribution to the broad patterns of history.
- Are associated with the lives of persons significant in the past.
- Embody the distinctive characteristics of a type, period, or method of construction; represent the work of a master; possess high artistic values; or represent a significant and distinguishable entity whose components may lack individual distinction.

- Have yielded, or may be likely to yield, information important in prehistory or history.

Eligible properties must meet at least one of the NRHP criteria and exhibit integrity, measured by the degree to which the resource retains its historical properties and conveys its historical character, the degree to which the original historic fabric has been retained, and the reversibility of changes to the property. The fourth criterion is typically reserved for archaeological and paleontological resources. These criteria have largely been incorporated into the CEQA Guidelines (Section 15065.5), as well.

At the local level, Policy HP-A.5.e of the Historic Preservation Element in the General Plan states that Native American monitors should be included during all phases of the investigation of archaeological resources. This would include surveys, testing, evaluations, data recovery phases, and construction monitoring.

4.3.2 State

a. California Environmental Quality Act

For the purposes of CEQA, a significant historical resource is one that qualifies for the California Register of Historical Resources (CRHR) or is listed in a local historic register or deemed significant in an historical resources survey, as provided under Section 5025.1(g) of the Public Resources Code. A resource that is not listed in or is not determined to be eligible for listing in the CRHR, is not included in a local register of historic resources, or is not deemed significant in a historical resources survey may nonetheless be deemed significant by a CEQA lead agency.

As indicated above, the California criteria (CEQA Guidelines Section 15065.5) for the registration of significant architectural, archaeological, and historical resources in the CRHR are nearly identical to those for the NRHP. Furthermore, CEQA Section 21083.2(g) defines the criteria for determining the significance of archaeological resources. These criteria include definitions for a “unique” resource based on its:

- Containing information needed to answer important scientific research questions and that there is a demonstrable public interest in that information.
- Having a special and particular quality such as being the oldest or best available example of its type.
- Being directly associated with a scientifically recognized important prehistoric or historic event or person.

b. California Register of Historic Resources (Public Resources Code Section 5020 et seq.)

Properties listed, or formally designated eligible for listing, in the NRHP are automatically listed in the CRHR as are State Historical Landmarks and Points of Interest. The CRHR also includes properties designated under local ordinances or identified through local historical resource surveys.

c. Native American Burials (Public Resources Code Section 5097 et seq.)

State law addresses the disposition of Native American burials in archaeological sites and protects such remains from disturbance, vandalism, or inadvertent destruction; establishes procedures to be implemented if Native American skeletal remains are discovered during construction of a project; and designates the NAHC to resolve disputes regarding the disposition of such remains. In addition, the Native American Historic Resource Protection Act makes it a misdemeanor punishable by up to a year in jail to deface or destroy an Indian historic or cultural site that is listed or may be eligible for listing in the CRHR.

d. California Native American Graves Protection and Repatriation Act

The California Native American Graves Protection and Repatriation Act (CAL-NAGPRA; 2001), like the federal act, ensures that Native American human remains and cultural items are treated with respect and dignity during all phases of the archaeological evaluation process in accordance with CEQA and any applicable local regulations.

e. Senate Bill 18

Native American involvement in the planning and development review process is addressed by several state laws. The most notable of the state laws is Senate Bill (SB) 18 which includes detailed requirements for local agencies to consult with identified California Native American Tribes early in the planning and/or development process.

f. Assembly Bill 52

On September 25, 2014, Governor Brown signed Assembly Bill (AB) 52, which created the new category of “tribal cultural resources” that must be considered under CEQA. AB 52 requires lead agencies to provide notice to tribes that are traditionally and culturally affiliated with the geographic area of a project if they have requested notice of projects proposed within that area. If the tribe requests consultation within 30 days upon receipt of the notice, the lead agency must consult with the tribe. AB 52 also provides a list of recommended mitigation measures to be included in the environmental document.

4.3.3 Local

a. City of San Diego Municipal Code: Historical Resources Regulations

In January 2000, the City’s Historical Resources Regulations (or Regulations), part of the SDMC (Chapter 14, Article 3, Division 2: Purpose of Historical Resources Regulations or Sections 143.0201-143.0280), were adopted, providing a balance between sound historic preservation principles and the rights of private property owners. The Regulations have been developed to implement applicable local, state, and federal policies and mandates. Included in these are the City’s General Plan, CEQA, and Section 106 of the National Historic Preservation Act of 1966. Historical resources, in the context of the City’s Regulations, include site improvements, buildings, structures, historic districts, signs, features (including significant trees or other landscaping), places, place names, interior elements and fixtures designated in conjunction with a property, or other objects of historical, archaeological, scientific, educational, cultural, architectural, aesthetic, or traditional significance to the citizens of the City. These include structures,

buildings, archaeological sites, objects, districts, or landscapes having physical evidence of human activities. These resources are usually over 45 years old, and they may have been altered or still be in use.

Historical Resources Guidelines (or Guidelines) are incorporated in the San Diego LDC and Land Development Manual by reference. These Guidelines set up a Development Review Process to review projects in the City. This process is composed of two aspects: the implementation of the Historical Resources Regulations and the determination of impacts and mitigation under CEQA.

Compliance with the Historical Resources Regulations begins with the determination of the need for a site-specific survey for a project. Section 143.0212(b) of the Regulations requires that historical resource sensitivity maps be used to identify properties in the City that have a probability of containing historic or pre-historic archaeological sites. These maps are based on records maintained by the South Coastal Information Center (SCIC) at San Diego State University (SDSU) of the California Historical Resources Information System (CHRIS), and the San Diego Museum of Man, as well as site-specific information in the City's files. If records show an archaeological site exists on or immediately adjacent to a subject property, the City shall require a survey. In general, archaeological surveys are required when the proposed development is on a previously undeveloped parcel, if a known resource is recorded on the parcel or within a 1-mile radius, or if a qualified consultant or knowledgeable City staff member recommends it. A historic property (built environment) survey can be required on a project if the properties are over 45 years old and appear to have integrity of setting, design, materials, workmanship, feeling, and association.

Section 143.0212(d) of the Regulations states that if a property-specific survey is required, it shall be conducted according to the Guidelines criteria. Using the survey results and other available applicable information, the City shall determine whether a historical resource exists, whether it is eligible for designation as a designated historical resource, and precisely where it is located.

b. Historical Resources Register

As compared to CEQA, the City provides a broader set of criteria for eligibility for the City's Historical Resources Register. As stated in the City's Historical Resources Guidelines, "Any improvement, building, structure, sign, interior element and fixture, feature, site, place, district, area, or object may be designated as historic by the City of San Diego Historical Resources Board if it meets any of the following criteria:

- Exemplifies or reflects special elements of the City's, a community's, or a neighborhood's historical, archaeological, cultural, social, economic, political, aesthetic, engineering, landscaping, or architectural development;
- Is identified with persons or events significant in local, State, or national history;
- Embodies distinctive characteristics of a style, type, period, or method of construction or is a valuable example of the use of indigenous materials or craftsmanship;
- Is representative of the notable work of a master builder, designer, architect, engineer, landscape architect, interior designer, artist, or craftsman;

- Is listed or has been determined eligible by the National Park Service for listing in the National Register of Historic Places or is listed or has been determined eligible by the State Historic Preservation Office (SHPO) for listing in the State Register of Historical Resources; or
- Is a finite group of resources related to one another in a clearly distinguishable way or is a geographically definable area or neighborhood containing improvements which have a special character, historical interest, or aesthetic value or which represent one or more architectural periods or styles in the history and development of the City.”

c. General Plan Historic Preservation Element

The Historic Preservation Element of the General Plan provides guidance on archaeological and historic site preservation in San Diego, including the roles and responsibilities of the Historical Resources Board (HRB), the status of cultural resource surveys, the Mills Act, conservation easements, and other public preservation incentives and strategies. A discussion of criteria used by the HRB to designate landmarks is included, as is a list of recommended steps to strengthen historic preservation in San Diego. The Element sets a series of goals for the City for the preservation of historic resources, and the first of these goals is to preserve significant historical resources. These goals are realized through implementation of policies that encourage the identification and preservation of historical resources.

City General Plan Policies HP-A.1 through HP-A.5 are associated with the overall identification and preservation of historical resources. This includes policies to provide for comprehensive historic resource planning and integration of such plans within City land use plans, such as the proposed CPU being analyzed within this PEIR. These policies also focus on coordinated planning and preservation of tribal resources, promoting the relationship with Kumeyaay/Diegueño tribes. Historic Preservation policies HP-B.1 through HP-B.4 address the benefits of historical preservation planning and the need for incentivizing maintenance, restoration, and rehabilitation of designated historical resources. This is proposed to be completed through a historic preservation sponsorship program and through cultural heritage tourism.

4.4 Geologic Conditions

4.4.1 State

a. Earthquake Fault Zoning Act (Alquist-Priolo Act)

The State of California Alquist-Priolo Earthquake Fault Zoning Act (1972) was established to mitigate the hazard of surface faulting to structures for human occupancy. Pursuant to the Act, the State Geologist has established regulatory zones (known as Earthquake Fault Zones) around surface traces of active faults. These have been mapped for affected cities, including San Diego. Application for a development permit for any project within a delineated earthquake fault zone shall be accompanied by a geologic report, prepared by a geologist registered in the State of California, that is directed to the problem of potential surface fault displacement through a project site.

4.4.2 Local

a. City of San Diego Seismic Safety Study

The San Diego Seismic Safety Study includes geologic hazards and fault maps of the City. Areas of the City are identified by geologic hazard category, which reflects the geologic hazard type and related risks. These are generalized maps, and site-specific geologic/geotechnical investigations may be necessary for proposed development or construction. LDC Section 145.1803 describes when a geotechnical investigation is required, and the City of San Diego Planning Information Bulletin 515 describes the minimum submittal requirements for geotechnical and geological reports that may be required for development permits, subdivision approvals, or grading permits.

b. City of San Diego General Plan Policies

The City's General Plan presents goals and policies for geologic and soil safety in the Public Facilities, Services, and Safety Element. Relevant excerpts from this element are included below.

Policy PF-Q.1. Protect public health and safety through the application of effective seismic, geologic, and structural considerations.

- a. Ensure that current and future community planning and other specific land use planning studies continue to include consideration of seismic and other geologic hazards. This information should be disclosed, when applicable, in the California Environmental Quality Act (CEQA) document accompanying a discretionary action.
- b. Maintain updated Citywide maps showing faults, geologic hazards, land use capabilities, and related studies used to determine suitable land uses.
- c. Require the submission of geologic and seismic reports, as well as soils engineering reports, in relation to applications for land development permits whenever seismic or geologic problems are suspected.
- d. Utilize the findings of a beach and bluff erosion survey to determine the appropriate rate and amount of coastline modification permissible in the City.
- e. Coordinate with other jurisdictions to establish and maintain a geologic "data bank" for the San Diego area.
- f. Regularly review local lifeline utility systems to ascertain their vulnerability to disruption caused by seismic or geologic hazards and implement measures to reduce any vulnerability.
- g. Adhere to state laws pertaining to seismic and geologic hazards.

Policy PF-Q.2. Maintain or improve integrity of structures to protect residents and preserve communities.

- Abate structures that present seismic or structural hazards with consideration of the desirability of preserving historical and unique structures and their architectural appendages, special geologic

and soils hazards, and the socio- economic consequences of the attendant relocation and housing programs.

- Continue to consult with qualified geologists and seismologists to review geologic and seismic studies submitted to the City as project requirements.
- Support legislation that would empower local governing bodies to require structural inspections for all existing pre-Riley Act (1933) buildings, and any necessary remedial work to be completed within a reasonable time.

4.5 Noise

4.5.1 State

a. California Code of Regulations

Title 24, Chapter 12, Section 1207 of the California Building Code (CBC) requires that interior noise levels, attributable to exterior sources, not exceed 45 dB CNEL in any habitable room. A habitable room in a building is used for living, sleeping, eating or cooking; bathrooms, closets, hallways, utility spaces, and similar areas are not considered habitable spaces. An acoustical study is required for proposed single-family, multiple-unit residential and hotel/motel structures within areas where the noise contours exceeds 60 dB CNEL. The studies must demonstrate that the design of the building will reduce interior noise to 45 dB CNEL or lower in habitable rooms. If compliance requires windows to be inoperable or closed, the structure must include ventilation or air-conditioning (24 CCR 1207).

Title 24, Chapter 11 of CalGreen provides mandatory measures for residential and non-residential buildings. Section 5.507, Environmental Comfort, addresses interior noise control in non-residential buildings. This section provides the minimum Sound Transmission Class and Outdoor–Indoor Sound Transmission Class for wall, roof–ceiling assemblies, and windows for buildings located within the 65 dBA CNEL contour of an airport, freeway, expressway, railroad, industrial source, or fixed guideway source as determined by the Noise Element of the General Plan. As indicated, buildings shall be constructed to provide an interior noise environment attributable to exterior sources that does not exceed an hourly average equivalent level of 50 dBA L_{eq} . Exterior features such as sound walls or earth berms may be utilized as appropriate to the building, addition, or alteration project to mitigate sound migration to the interior. An acoustical analysis documenting complying interior sound levels shall be prepared by personnel approved by the architect or engineer of record.

4.5.2 Local

a. City of San Diego General Plan

Exterior Noise

The City specifies compatibility guidelines for different categories of land use in the Noise Element of the General Plan. Table 4-1 provides compatibility guidelines for noise levels by land use as identified in the City's General Plan (City of San Diego 2015).

Table 4-1 City of San Diego Land Use – Noise Compatibility Guidelines (Table NE-3)					
Land Use Category		Exterior Noise Exposure (dBA CNEL)			
		60	65	70	75
Parks and Recreational					
Parks, Active and Passive Recreation					
Outdoor Spectator Sports, Golf Courses; Water Recreational Facilities; Indoor Recreation Facilities					
Agricultural					
Crop Raising & Farming; Community Gardens, Aquaculture, Dairies; Horticulture Nurseries & Greenhouses; Animal Raising, Maintain & Keeping; Commercial Stables					
Residential					
Single Dwelling Units; Mobile Homes					
Multiple Dwelling Units *For uses affected by aircraft noise, refer to Policies NE-D.2. & NE-D.3.					
Institutional					
Hospitals; Nursing Facilities; Intermediate Care Facilities; Kindergarten through Grade 12 Educational Facilities; Libraries; Museums; Child Care Facilities					
Other Educational Facilities including Vocational/Trade Schools and Colleges and Universities					
Cemeteries					
Retail Sales					
Building Supplies/Equipment; Food, Beverages & Groceries; Pets & Pet Supplies; Sundries, Pharmaceutical, & Convenience Sales; Wearing Apparel & Accessories					
Commercial Services					
Building Services; Business Support; Eating & Drinking; Financial Institutions; Maintenance & Repair; Personal Services; Assembly & Entertainment (includes public and religious assembly); Radio & Television Studios; Golf Course Support					
Visitor Accommodations					
Offices					
Business & Professional; Government; Medical, Dental & Health Practitioner; Regional & Corporate Headquarters					
Vehicle and Vehicular Equipment Sales and Services Use					
Commercial or Personal Vehicle Repair & Maintenance; Commercial or Personal Vehicle Sales & Rentals; Vehicle Equipment & Supplies Sales & Rentals; Vehicle Parking					
Wholesale, Distribution, Storage Use Category					
Equipment & Materials Storage Yards; Moving & Storage Facilities; Warehouse; Wholesale Distribution					
Industrial					
Heavy Manufacturing; Light Manufacturing; Marine Industry; Trucking & Transportation Terminals; Mining & Extractive Industries					
Research & Development					
	Compatible	Indoor Uses	Standard construction methods should attenuate exterior noise to an acceptable indoor noise level. Refer to Section I.		
		Outdoor Uses	Activities associated with the land use may be carried out.		
45, 50	Conditionally Compatible	Indoor Uses	Building structure must attenuate exterior noise to the indoor noise level indicated by the number (45 or 50) for occupied areas. Refer to Section I.		
		Outdoor Uses	Feasible noise mitigation techniques should be analyzed and incorporated to make the outdoor activities acceptable. Refer to Section I.		
	Incompatible	Indoor Uses	New construction should not be undertaken.		
		Outdoor Uses	Severe noise interference makes outdoor activities unacceptable.		

Source: City of San Diego, General Plan Amendment to the Noise Element 2015

As shown, the “compatible” noise level for noise-sensitive receptors, including single- and multi-family residential, is 60 dBA CNEL. Compatibility indicates that standard construction methods will attenuate exterior noise to an acceptable indoor noise level and people can carry out outdoor activities with minimal noise interference.

Exterior noise levels ranging between 65 and 70 dBA CNEL are considered “conditionally compatible” for multiple units, mixed-use commercial/residential, live work, and group living accommodations. The Noise Element also states (Section B, Motor Vehicle Traffic Noise) that although not generally considered compatible, the City conditionally allows multi-family and mixed-use residential uses up to 75 dBA CNEL with a requirement to include attenuation measures to ensure an interior noise level of 45 dBA CNEL where a Community Plan allows multi-family and mixed-use.

For single-family units, mobile homes, and senior housing, exterior noise levels ranging between 60 and 65 dBA CNEL are considered “conditionally compatible.” Conditionally compatible uses are permissible, provided interior noise levels will not exceed 45 dBA CNEL. Therefore, projects sited on land that falls into the “conditionally compatible” noise environment require an acoustical study.

Park uses are considered compatible in areas up to 70 dBA CNEL and conditionally compatible in areas between 70 and 75 dBA CNEL.

Interior Noise

Noise-sensitive residential/habitable interior spaces have an interior standard of 45 CNEL, as stated in the City’s 2016 Significance Determination Thresholds and the California Noise Insulation Standards. The Significance Determination Thresholds indicate that for multi-family development, exterior noise levels would be considered significant if future projected traffic would result in noise levels exceeding 65 dBA CNEL at exterior usable areas or interior noise levels exceeding 45 dBA CNEL.

The City assumes that standard construction techniques will provide a 15 dB reduction of exterior noise levels to an interior receiver. Given this assumption, standard building construction could be assumed to result in interior noise levels of 45 dB CNEL or less when exterior noise sources are 60 dBA CNEL or less. When exterior noise levels are greater than 60 dBA CNEL, consideration of specific non-standard building construction techniques is required.

Proposed new construction and major renovations must demonstrate compliance with the current interior noise standards through submission and approval of a Title 24 Compliance Report. In the case of ministerial projects for single-family, there is no procedure to ensure that noise is adequately attenuated outside of the AIA.

Policies

The General Plan Noise Element contains the following policies regarding the preparation of acoustical studies and interior noise guidelines:

NE-A.4. Require an acoustical study consistent with Acoustical Study Guidelines (Table NE-4) for proposed developments in areas where the existing or future noise level exceeds or would exceed the “compatible” noise level thresholds as indicated on the Land Use – Noise

Compatibility Guidelines (Table NE-3), so that noise mitigation measures can be included in the project design to meet the noise guidelines.

NE-I.1. Require noise attenuation measures to reduce the noise to an acceptable noise level for proposed developments to ensure an acceptable interior noise level, as appropriate, in accordance with California's noise insulation standards (CCR Title 24) and Airport Land Use Compatibility Plans.

NE-I.2. Apply CCR Title 24 noise attenuation measures requirements to reduce the noise to an acceptable noise level for proposed single-family, mobile homes, senior housing, and all other types of residential uses not addressed by CCR Title 24 to ensure an acceptable interior noise level, as appropriate.

NE-E.5. Implement night and daytime on-site noise level limits to address noise generated by commercial uses where it affects abutting residential and other noise-sensitive uses.

b. Noise Abatement and Control Ordinance

Section 59.5.0101 et seq. of the SDMC, the Noise Abatement and Control Ordinance, regulates the sources of disturbing, excessive, or offensive noises within the City limits. Sound level limits are established for various types of land uses and are measured in 1-hour averages. The 1-hour, A-weighted equivalent sound level, $L_{eq}(1)$, is the energy average of the A-weighted sound levels occurring during a 1-hour period. The Ordinance states that it is unlawful for any person to cause noise by any means to the extent that the 1-hour average sound level exceeds the applicable limit given for that land use. The sound level limit at a location on a boundary between two zoning districts is the arithmetic mean of the respective limits for the two districts. Table 4-2 shows the exterior noise limits specified in the City's Noise Control Ordinance.

Receiving Land Use Category	Noise Level [dBA]		
	7:00 A.M. to 7:00 P.M.	7:00 P.M. to 10:00 P.M.	10:00 P.M. to 7:00 A.M.
Single-family Residential	50	45	40
Multi-family Residential (up to a maximum density of 1 dwelling unit/2,000 square feet)	55	50	45
All Other Residential	60	55	50
Commercial	65	60	60
Industrial or Agricultural	75	75	75

Source: City of San Diego Municipal Code Section 59.5.0401

Construction noise is regulated by Section 59.5.0404 of the SDMC, which states:

- It shall be unlawful for any person, between the hours of 7:00 P.M. of any day and 7:00 A.M. of the following day, or on legal holidays as specified in Section 21.04 of the San Diego Municipal Code, with exception of Columbus Day and Washington's Birthday, or on Sundays, to erect, construct,

demolish, excavate for, alter or repair any building or structure in such a manner as to create disturbing, excessive or offensive noise ...

- ... it shall be unlawful for any person, including the City of San Diego, to conduct any construction activity so as to cause, at or beyond the property lines of any property zoned residential, an average sound level greater than 75 decibels during the 12-hour period from 7:00 A.M. to 7:00 P.M.

c. Airport Land Use Compatibility Plan

As discussed in Section 5.1.4, the San Diego County Regional Airport Authority prepared an ALUCP for SDIA. The proposed CPU area is within the Review Area 2 AIA for SDIA. While the overflight areas are outside of the 60 dB airport noise contour, the adopted ALUCP for SDIA contains policies to inform prospective residents of new residential development that they area within an area with the overflight of aircraft and could be effected by aircraft noise.

4.6 Health and Safety

Hazardous materials and hazardous wastes are extensively regulated by federal, state, and local regulations, with the major objective of protecting public health and the environment. In general, these regulations provide definitions of hazardous substances; identify responsible parties; establish reporting requirements; set guidelines for handling, storage, transport, remediation, and disposal of hazardous materials and wastes; and require health and safety provisions for both workers and the public, such as emergency response and worker training programs. The major regulations relevant to the proposed CPU area are summarized below.

4.6.1 Federal

USEPA is the primary federal agency regulating hazardous wastes and materials. The USEPA broadly defines a hazardous waste as one that is specifically listed in USEPA regulations, has been tested, and meets one of the four characteristics established by USEPA (toxicity, ignitability, corrosiveness, and reactivity), or that has been declared hazardous by the generator based on its knowledge of the waste. USEPA defines hazardous materials as any item or chemical that can cause harm to people, plants, or animals when released by spilling, leaking, pumping, pouring, emptying, discharging, injecting, leaching, dumping, or disposing into the environment. Federal regulations pertaining to hazardous wastes and materials are generally contained in Titles 29, 40, and 49 of the CFR, which are discussed herein. The terms hazardous wastes and hazardous materials are used interchangeably in this section.

a. Resource Conservation and Recovery Act of 1976

The Resource Conservation and Recovery Act of 1976 (42 United States Code [U.S.C.] Sections 6901–6987), including the Hazardous and Solid Waste Amendments of 1984, protects human health and the environment, and imposes regulations on hazardous waste generators, transporters, and operators of treatment, storage, and disposal facilities. The Hazardous and Solid Waste Amendments also requires USEPA to establish a comprehensive regulatory program for underground storage tanks. The corresponding regulations in 40 CFR 260–299 provide the general framework for managing hazardous

waste, including requirements for entities that generate, store, transport, treat, and dispose of hazardous waste.

b. Hazardous Materials Transportation Act

DOT, the Federal Highway Administration (FHWA), and the Federal Railroad Administration are the three entities that regulate the transport of hazardous materials at the federal level. The Hazardous Materials Transportation Act (49 CFR 171, Subchapter C) governs the transportation of hazardous materials. These regulations are promulgated by DOT and enforced by USEPA.

4.6.2 State

a. California Code of Regulations Title 22

CCR Title 22 provides the following definition of hazardous materials:

A hazardous material is a substance or combination of substances which, because of its quantity, concentration or physical, chemical, or infectious characteristics, may either (1) cause or significantly contribute to an increase in mortality or an increase in serious, irreversible or incapacitating irreversible illness; or (2) pose a substantial present or potential hazard to human health and safety, or the environment when improperly treated, stored, transported or disposed of. Hazardous materials include waste that has been abandoned, discarded, or recycled on the property and as a result represents a continuing hazard as the development is proposed. Hazardous materials also include any contaminated soil or groundwater.

Title 22 also provides standards applicable to generators and transporters of hazardous wastes, as well as standards for operators of hazardous waste transfer facilities, among other regulations.

b. Hazardous Materials Release Response Plans and Inventory

Two programs in the California Health and Safety Code (H&SC) Chapter 6.95 are directly applicable to the CEQA issue of risk due to hazardous substance release. In San Diego County, these two programs are referred to as the Hazardous Materials Business Plan (HMBP) program and the California Accidental Release Prevention (CalARP) program. The County of San Diego Department of Environmental Health (DEH) is responsible for the implementation of the HMBP program and the CalARP program in San Diego County. The HMBP and CalARP programs provide threshold quantities for regulated hazardous substances. When the indicated quantities are exceeded, an HMBP or Risk Management Plan is required pursuant to the regulations. Congress requires EPA Region 9 to make Risk Management Plan information available to the public through USEPA's Envirofacts Data Warehouse. The Envirofacts Data Warehouse is considered the single point of access to select USEPA environmental data. California H&SC Section 25270, Aboveground Petroleum Storage Act, requires registration and spill prevention programs for aboveground storage tanks (ASTs) that store petroleum. In some cases, ASTs for petroleum may be subject to groundwater monitoring programs implemented by the RWQCBs and the SWRCB.

c. Emergency Response to Hazardous Materials Incidents

California has developed an emergency response plan to coordinate emergency services provided by federal, state, and local governments and private agencies. Response to hazardous material incidents is one part of this plan. The plan is managed by the California Emergency Management Agency, which coordinates the responses of other agencies, including the California Environmental Protection Agency (California EPA), the California Highway Patrol, CDFW, and RWQCB.

d. California Department of Toxic Substances Control

Within California EPA, the California Department of Toxic Substances Control (DTSC) has primary regulatory responsibility, with delegation of enforcement to local jurisdictions that enter into agreements with the state agency, for the management of hazardous materials and the generation, transport, and disposal of hazardous waste under the authority of the Hazardous Waste Control Law. Since August 1, 1992, DTSC has been authorized to implement the state's hazardous waste management program for the California EPA.

DTSC is responsible for compiling a list of hazardous materials sites pursuant to Government Code Section 65962.5, which includes five categories:

- Hazardous waste facilities subject to corrective action pursuant to Section 25187.5 of the health and safety code;
- Land designated as "hazardous waste property" or "border zone property;"
- Properties with hazardous waste disposals on public land;
- Hazardous substance release sites selected for (and subject to) a response action; and
- Sites included in the Abandoned Site Assessment Program.

4.6.3 Local

a. County of San Diego Department of Environmental Health

The Hazardous Materials Division (HMD) of DEH regulates hazardous waste and tiered permitting, USTs, aboveground petroleum storage and risk management plans, hazardous materials business plans and chemical inventory, and medical waste. The HMD's goal is "to protect human health and the environment by ensuring that hazardous materials, hazardous waste, medical waste, and underground storage tanks are properly managed" (County of San Diego 2016).

b. California EPA's Unified Program

In 1993, SB 1082 gave California EPA the authority and responsibility to establish a unified hazardous waste and hazardous materials management and regulatory program, commonly referred to as the Unified Program. The purpose of this program is to consolidate and coordinate six different hazardous materials and hazardous waste programs, and to ensure that they are consistently implemented

throughout the state. California EPA oversees the Unified Program with support from DTSC, RWQCBs, the San Diego County Office of Emergency Services (OES), and the State Fire Marshal.

State law requires county and local agencies to implement the Unified Program. The agency in charge of implementing the program is called the Certified Unified Program Agency (CUPA). The County of San Diego DEH, Hazardous Materials Division, is the designated CUPA for the county. In addition to the CUPA, other local agencies help to implement the Unified Program. These agencies are called Participatory Agencies. The HMD is the Participatory Agency for San Diego County.

c. San Diego County Multi-Jurisdictional Hazard Mitigation Plan

Long-term prevention, mitigation efforts, and risk-based preparedness for specific hazards within San Diego are addressed as a part of the 2010 San Diego County Multi-Jurisdictional Hazard Mitigation Plan (HAZMIT), which was finalized in February 2010. The HAZMIT identifies specific risks for San Diego County and provides methods to help minimize damage caused by natural and man-made disasters. The final list of hazards profiled for San Diego County was determined as wildfire/structure fire, flood, coastal storms/erosion/ tsunami, earthquake/liquefaction, rain-induced landslide, dam failure, hazardous materials incidents, nuclear materials release, and terrorism. The plan is currently being reviewed and revised to reflect changes to hazards threatening San Diego County as well as the programs in place to minimize or eliminate those hazards. This revision will include an evaluation of the impact climate change is having on the natural hazards facing San Diego. The San Diego County OES is responsible for coordinating with local jurisdictions and participating agencies to monitor, evaluate, and update the HAZMIT as necessary.

d. San Diego County Operational Area Emergency Plan

The 2010 San Diego County Operational Area Emergency Plan describes a comprehensive emergency management system, which provides for a planned response to disaster situations associated with natural disasters, technological incidents, terrorism, and nuclear-related incidents. It delineates operational concepts relating to various emergency situations, identifies components of the Emergency Management Organization, and describes the overall responsibilities for protecting life and property and providing for the overall well-being of the population. The plan also identifies the sources of outside support that might be provided (through mutual aid and specific statutory authorities) by other jurisdictions, state and federal agencies, and the private sector.

e. City of San Diego General Plan

The City's General Plan presents goals and policies relating to hazardous materials and disaster preparedness in the Public Facilities, Services, and Safety Element.

f. Brush Management Regulations

The SDMC includes general hazardous materials regulations (Sections 42.0801, 42.0901, and 54.0701) as well as regulations regarding specific hazardous materials such as explosives (Section 55.3301).

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. Unless otherwise approved by the City Fire Marshal, the brush management plans for all future development would consist of two separate and distinct zones as follows:

- Zone One would consist of the area adjacent to structures where flammable materials would be minimized through the use of pavement and/or permanently irrigated ornamental landscape plantings. This zone would not be allowed on slopes with a gradient greater than 4:1.
- Zone Two would consist of the area between Zone One and any area of native or non-irrigated vegetation and shall consist of thinned native or naturalized vegetation.

4.7 Hydrology/Water Quality

There are federal, state, and local regulations that impose requirements on new development for erosion control, control of runoff contaminants, and control of direct discharge of pollutants that impact water quality. These laws, regulations, and standards are summarized below.

4.7.1 Federal

a. Clean Water Act

The Clean Water Act (33 United States Code [U.S.C.] Section 1251 et seq.) (1972) is the primary federal law that protects the nation's waters, including lakes, rivers, aquifers, and coastal areas. The Clean Water Act established basic guidelines for regulating discharges of pollutants into waters of the United States and requires that states adopt water quality standards to protect public health, enhance the quality of water resources, and ensure implementation of the Clean Water Act.

Section 401 of the Clean Water Act requires that any applicant for a federal permit to conduct any activity, including the construction or operation of a facility that may result in the discharge of any pollutant, must obtain certification from the state. Section 402 of the Clean Water Act established the NPDES to regulate the discharge of pollutants from point sources, and Section 404 established a permit program to regulate the discharge of dredged material into waters of the United States. In California, the SWRCB and RWQCBs administer the NPDES permitting programs and are responsible for developing waste discharge requirements. Each RWQCB is responsible for developing waste discharge requirements specific to its jurisdiction. General waste discharge requirements that may apply to projects or recommendations contained within the proposed CPU include the SWRCB Construction General Permit and Industrial General Permit and the regional MS4 Permit administered by the RWQCB.

Under section 303(d) of the Clean Water Act, states, territories, and authorized tribes are required to develop lists of impaired waters. These are waters that are too polluted or otherwise degraded to meet the water quality standards set by states, territories, or authorized tribes. The law requires that these jurisdictions establish priority rankings for waters on the lists and develop TMDLs for these waters. A TMDL is a calculation of the maximum amount of a pollutant that a waterbody can receive and still safely meet water quality standards.

b. Executive Order 11988, Floodplain Management

The major requirements of this executive order (EO) are to avoid support of floodplain development; to prevent uneconomic, hazardous, or incompatible use of floodplains; to protect and preserve the natural and beneficial floodplain values; and to be consistent with the standards and criteria of the National Flood Insurance Program. The basic tools for regulating construction in potentially hazardous floodplain areas are local zoning techniques. Proper floodplain zoning can be beneficial in the preservation of open space, retention of floodplains as groundwater recharge areas, and directing of development to less flood-prone areas.

4.7.2 State

a. California Department of Fish and Game Code – Streambed Alteration Program

The CDFW regulates activities that would divert or obstruct the natural flow or substantially change the bed, channel, or bank of any river, stream, or lake that supports fish or wildlife. CDFW has jurisdiction over riparian habitats (e.g., southern willow scrub) associated with watercourses. CDFW jurisdictional resources are delineated by the outer edge of riparian vegetation or at the top of the bank of streams or lakes, whichever is wider. A Streambed Alteration Agreement is required for a project that would impact CDFW jurisdictional resources. The Agreement with CDFW typically requires mitigation in the form of on-site, off-site, or in-lieu fee mitigation, or a combination of all three forms.

b. Porter-Cologne Water Quality Control Act

The Porter-Cologne Water Quality Control Act established the principal California legal and regulatory framework for water quality control. The Porter-Cologne Water Quality Control Act is embodied in the California Water Code. The California Water Code authorizes the SWRCB to implement the provisions of the federal Clean Water Act. The State of California is divided into nine regions governed by RWQCBs. The RWQCBs implement and enforce provisions of the California Water Code and the Clean Water Act under the oversight of the SWRCB. The City is located within the purview of the San Diego RWQCB (Region 9). The Porter-Cologne Act also provides for the development and periodic review of Water Quality Control Plans (Basin Plans) that designate beneficial uses of California's major rivers and other surface waters and groundwater basins, and establishes water quality objectives for those waters.

c. San Diego Regional Water Quality Control Board (Water Board) Order No. R9-2013-0001, as amended by Order No. R9-2015-0001 and Order No. R9-2015-0100, NPDES Permit No. CAS0109266

Under the authority of the Clean Water Act amendments and federal NPDES Permit regulations, the RWQCB issued this order to the Copermittees consisting of San Diego County, the 18 cities within San Diego County, the Port of San Diego, and the San Diego Regional Airport Authority. This order requires that all jurisdictions within the San Diego region prepare Jurisdictional Runoff Management Plans. Each of these jurisdictional plans must contain a component addressing construction activities and a component addressing existing development. The subsequent amendments expanded coverage to

portions of Orange County and Riverside County within the San Diego Region (Region 9) and made other modifications.

4.7.3 Local

a. Water Quality Control Plan for the San Diego Basin

The San Diego Basin encompasses approximately 3,900 square miles, including most of San Diego County and portions of southwestern Riverside and Orange counties. The basin is composed of 11 major hydrologic units, 54 hydrologic areas, and 147 hydrologic subareas, extending from Laguna Beach southerly to the United States/Mexico border. Drainage from higher elevations in the east flow to the west, ultimately into the Pacific Ocean. The RWQCB prepared the Basin Plan, which defines existing and potential beneficial uses and water quality objectives for coastal waters, groundwater, surface waters, imported surface waters, and reclaimed waters in the basin. Water quality objectives seek to protect the most sensitive of the beneficial uses designated for a specific water body.

b. City of San Diego Jurisdictional Runoff Management Plan

This document is a total account of how the City of San Diego plans to protect and improve the water quality of rivers, bays, and the ocean in the region in compliance with the RWQCB permit referenced above. The document describes how the City incorporates storm water BMPs into land use planning, development review and permitting, City CIP project planning and design, and the execution of construction contracts.

c. Water Quality Improvement Plans

The MS4 Permit also requires development of WQIPs that guide the Copermitees' jurisdictional runoff management programs toward achieving improved water quality in MS4 discharges and receiving waters. The San Diego River Watershed Management Area WQIP applies to the portion of the Old Town community draining to the San Diego River, while the San Diego Bay Watershed Management Area WQIP applies to the remainder of the community draining to San Diego Bay. The WQIPs further the Clean Water Act's objectives to protect, preserve, enhance, and restore the water quality and designated beneficial uses of waters of the state. The requirement sets forth a collaborative and adaptive planning and management process that identifies the highest-priority water quality conditions within a watershed management area and implements strategies through the jurisdictional runoff management programs of the respective jurisdictions.

d. Local Drainage Design Manual

Chapter 14, Article 2, Division 2 of the SDMC outlines Storm Water Runoff and Drainage Regulations, which apply to all development in the City, regardless of whether a development permit or other approval is required. In addition, drainage design policies and procedures are provided in the City's Drainage Design Manual (which is incorporated in the Land Development Manual as Appendix B). The Drainage Design Manual (January 2017) provides a guide for designing drainage and drainage-related facilities for developments within the City.

e. Storm Water Standards Manual

The City's current Storm Water Standards Manual (which is incorporated in the Land Development Manual as Appendix O) provides information to project applicants on how to comply with the permanent and construction storm water quality requirements in the City. Significant elements of the Storm Water Standards Manual include:

1. LID BMP Requirements
2. Source Control BMPs
3. BMPs Applicable to Individual Priority Development Project Categories
4. Treatment Control BMPs

Although the footprint of the LID BMPs can often fit into planned landscaping features, this requires early planning to ensure that the features are located in places where they can intercept the drainage and safely store the water without adverse effects to adjacent slopes, structures, roadways, or other features. The Storm Water Standards Manual also addresses "Hydromodification – Limitations on Increases of Runoff Discharge Rates and Durations." Hydromodification management requirements would dictate design elements in locations where downstream channels are susceptible to erosion from increases in storm water runoff discharge rates and durations. Future development projects proposed within areas draining to San Diego Bay would typically be exempt from hydromodification management requirements because of the location and hardened drainage systems. Exemptions from hydromodification management requirements shall adhere to the current City's Storm Water Standards Manual. Projects discharging into underground storm drains discharging directly to bays or the ocean are exempt, subject to conditions listed in the City's Storm Water Standards Manual.

The Storm Water Standards Manual also provides minimum requirements for construction site management, inspection, and maintenance of construction BMPs; monitoring of the weather and implementation of emergency plans as needed; and minimum performance standards, including the following: pollution prevention measures so that there would be no measurable increase of pollution (including sediment) in runoff from the site, no slope erosion, water velocity moving off-site must not be greater than pre-construction levels, and natural hydraulic features and riparian buffers preserved where possible. The City's Storm Water Standards Manual was updated in ~~2016~~January 2018 for consistency with the Regional Best Management Practices Design Manual.

f. City of San Diego General Plan

The General Plan presents goals and policies for storm water infrastructure in the Public Facilities, Services, and Safety Element, and presents goals and policies for open space (including floodplain management) and urban runoff management in the Conservation Element.

4.8 Visual Effects and Neighborhood Character

4.8.1 State

a. California Scenic Highways Program

Recognizing the value of scenic areas and the value of views from roads in such areas, the California State Legislature established the California Scenic Highway Program in 1963. This legislation sees scenic highways as "a vital part of the all-encompassing effort ... to protect and enhance California's beauty, amenity and quality of life." Under this program, a number of state highways have been designated as eligible for inclusion as scenic routes. The 1-mile portion of State Route 163, known as the Cabrillo Freeway, between the north and south boundaries of Balboa Park, is an Officially Designated State Scenic Highway. I-8 and I-5 within the proposed CPU area are eligible state scenic highways although not officially designated.

4.8.2 Local

a. City of San Diego General Plan

The General Plan includes a Citywide urban design strategy, goals, and policies regarding the physical features that define the character of a neighborhood or community. These goals complement the goals for pedestrian-oriented and walkable villages articulated in the City of Villages strategy.

The Urban Design Element of the General Plan establishes a set of design principles on which its policies are based and on which future public and private development physical design decisions can be based.

In its introduction, the Urban Design Element of the General Plan states:

As the availability of vacant land becomes more limited, designing infill development and redevelopment that builds upon our existing communities becomes increasingly important. A compact, efficient, and environmentally sensitive pattern of development becomes increasingly important as the City continues to grow. In addition, future development should accommodate and support existing and planned transit service (City of San Diego 2008).

The General Plan Urban Design Element policies relevant to planning at the Community Plan level involve architectural and landscape elements, as well as the design of transit and parking facilities, and residential development, mixed-use villages and commercial areas, office and business park development, and public spaces and facilities. Policies call for respecting San Diego's natural topography and distinctive neighborhoods; providing public art; and encouraging the development of walkable, transit-oriented communities. The proposed CPU refines the General Plan Urban Design policies to reflect the architectural period characteristic of Old Town San Diego prior to 1871 and small town character.

4.9 Air Quality

Motor vehicles are San Diego County's leading source of air pollution. In addition to these sources, other mobile sources include construction equipment, trains, and airplanes. Emission standards for mobile sources are established by state and federal agencies, such as CARB and USEPA. Reducing mobile source emissions requires the technological improvement of existing mobile sources and the examination of future mobile sources, such as those associated with new or modification projects (e.g., retrofitting older vehicles with cleaner emission technologies). The State of California has developed statewide programs to encourage cleaner cars and cleaner fuels. Since 1996, smog-forming emissions from motor vehicles have been reduced by 15 percent, and the cancer risk from exposure to motor vehicle air toxics has been reduced by 40 percent. The regulatory framework described below details the federal and state agencies that are in charge of monitoring and controlling mobile source air pollutants and the measures currently being taken to achieve and maintain healthful air quality in the SDAB.

In addition to mobile sources, stationary sources also contribute to air pollution in the SDAB. Stationary sources include gasoline stations, power plants, dry cleaners, and other commercial and industrial uses. Stationary sources of air pollution are regulated by the local air pollution control or management district, in this case the San Diego APCD.

The State of California is divided geographically into 15 air basins for managing the air resources of the state on a regional basis. Areas within each air basin are considered to share the same air masses and, therefore, are expected to have similar ambient air quality. If an air basin is not in either federal or state attainment for a particular pollutant, the basin is classified as a moderate, serious, severe, or extreme non-attainment area for that pollutant (there is also a marginal classification for federal non-attainment areas). Once a non-attainment area has achieved the air quality standards for a particular pollutant, it may be redesignated to an attainment area for that pollutant. To be redesignated, the area must meet air quality standards and have a 10-year plan for continuing to meet and maintain air quality standards, as well as satisfy other requirements of the Clean Air Act (CAA). Areas that are redesignated to attainment are called maintenance areas.

4.9.1 Federal

Ambient air quality standards represent the maximum levels of background pollution considered safe, with an adequate margin of safety, to protect the public health and welfare. The federal CAA was enacted in 1970 and amended in 1977 and 1990 [42 U.S.C. 7401] for the purposes of protecting and enhancing the quality of the nation's air resources to benefit public health, welfare, and productivity. In 1971, in order to achieve the purposes of Section 109 of the CAA [42 U.S.C. 7409], USEPA developed primary and secondary national ambient air quality standards (NAAQS).

Six criteria pollutants of primary concern have been designated: ozone, CO, SO₂, NO₂, lead (Pb), and respirable particulate matter (PM₁₀ and PM_{2.5}). The primary NAAQS "... in the judgment of the Administrator, based on such criteria and allowing an adequate margin of safety, are requisite to protect the public health ..." and the secondary standards "... protect the public welfare from any known or anticipated adverse effects associated with the presence of such air pollutant in the ambient air" [42 U.S.C. 7409(b)(2)]. The primary NAAQS were established, with a margin of safety, considering long-term exposure for the most sensitive groups in the general population (i.e., children, senior citizens, and people with breathing difficulties). The NAAQS are presented in Table 4-3.

**Table 4-3
Ambient Air Quality Standards**

Pollutant	Averaging Time	California Standards ¹		National Standards ²		
		Concentration ³	Method ⁴	Primary ^{3,5}	Secondary ^{3,6}	Method ⁷
Ozone ⁸	1 Hour	0.09 ppm (180 µg/m ³)	Ultraviolet Photometry	–	Same as Primary Standard	Ultraviolet Photometry
	8 Hour	0.07 ppm (137 µg/m ³)		0.070 ppm (137 µg/m ³)		
Respirable Particulate Matter (PM ₁₀) ⁹	24 Hour	50 µg/m ³	Gravimetric or Beta Attenuation	150 µg/m ³	Same as Primary Standard	Inertial Separation and Gravimetric Analysis
	Annual Arithmetic Mean	20 µg/m ³		–		
Fine Particulate Matter (PM _{2.5}) ⁹	24 Hour	No Separate State Standard		35 µg/m ³	Same as Primary Standard	Inertial Separation and Gravimetric Analysis
	Annual Arithmetic Mean	12 µg/m ³	Gravimetric or Beta Attenuation	12 µg/m ³		
Carbon Monoxide (CO)	1 Hour	20 ppm (23 mg/m ³)	Non-dispersive Infrared Photometry	35 ppm (40 mg/m ³)	–	Non-dispersive Infrared Photometry
	8 Hour	9.0 ppm (10 mg/m ³)		9 ppm (10 mg/m ³)	–	
	8 Hour (Lake Tahoe)	6 ppm (7 mg/m ³)		–	–	
Nitrogen Dioxide (NO ₂) ¹⁰	1 Hour	0.18 ppm (339 µg/m ³)	Gas Phase Chemi- luminescence	100 ppb (188 µg/m ³)	–	Gas Phase Chemi- luminescence
	Annual Arithmetic Mean	0.030 ppm (57 µg/m ³)		0.053 ppm (100 µg/m ³)	Same as Primary Standard	
Sulfur Dioxide (SO ₂) ¹¹	1 Hour	0.25 ppm (655 µg/m ³)	Ultraviolet Fluorescence	75 ppb (196 µg/m ³)	–	Ultraviolet Fluorescence; Spectro- photometry (Pararosaniline Method)
	3 Hour	–		–	0.5 ppm (1,300 µg/m ³)	
	24 Hour	0.04 ppm (105 µg/m ³)		0.14 ppm (for certain areas) ¹⁰	–	
	Annual Arithmetic Mean	–		0.030 ppm (for certain areas) ¹⁰	–	
Lead ^{12,13}	30 Day Average	1.5 µg/m ³	Atomic Absorption	–	–	High Volume Sampler and Atomic Absorption
	Calendar Quarter	–		1.5 µg/m ³ (for certain areas) ¹²	Same as Primary Standard	
	Rolling 3-Month Average	–		0.15 µg/m ³		
Visibility Reducing Particles ¹⁴	8 Hour	See footnote 13	Beta Attenuation and Transmittance through Filter Tape	No National Standards		
Sulfates	24 Hour	25 µg/m ³	Ion Chroma- tography			
Hydrogen Sulfide	1 Hour	0.03 ppm (42 µg/m ³)	Ultraviolet Fluorescence			
Vinyl Chloride ¹²	24 Hour	0.01 ppm (26 µg/m ³)	Gas Chroma- tography			

See footnotes on next page.

ppm = parts per million; ppb = parts per billion; µg/m³ = micrograms per cubic meter; – = not applicable.

¹ California standards for ozone, carbon monoxide (except 8-hour Lake Tahoe), sulfur dioxide (1 and 24 hour), nitrogen dioxide, particulate matter (PM₁₀, PM_{2.5}, and visibility reducing particles), are values that are not to be exceeded. All others are not to be equaled or exceeded. California ambient air quality standards are listed in the Table of Standards in Section 70200 of Title 17 of the California Code of Regulations.

² National standards (other than ozone, particulate matter, and those based on annual arithmetic mean) are not to be exceeded more than once a year. The ozone standard is attained when the fourth highest 8-hour concentration measured at each site in a year, averaged over 3 years, is equal to or less than the standard. For PM₁₀, the 24-hour standard is attained when the expected number of days per calendar year with a 24-hour average concentration above 150 µg/m³ is equal to or less than 1. For PM_{2.5}, the 24-hour standard is attained when 98 percent of the daily concentrations, averaged over 3 years, are equal to or less than the standard. Contact the USEPA for further clarification and current national policies.

³ Concentration expressed first in units in which it was promulgated. Equivalent units given in parentheses are based

upon a reference temperature of 25°C and a reference pressure of 760 torr. Most measurements of air quality are to be corrected to a reference temperature of 25°C and a reference pressure of 760 torr; ppm in this table refers to ppm by volume, or micromoles of pollutant per mole of gas.

- ⁴ Any equivalent measurement method which can be shown to the satisfaction of the Air Resources Board to give equivalent results at or near the level of the air quality standard may be used.
- ⁵ National Primary Standards: The levels of air quality necessary, with an adequate margin of safety to protect the public health.
- ⁶ National Secondary Standards: The levels of air quality necessary to protect the public welfare from any known or anticipated adverse effects of a pollutant.
- ⁷ Reference method as described by the USEPA. An “equivalent method” of measurement may be used but must have a “consistent relationship to the reference method” and must be approved by the USEPA.
- ⁸ On October 1, 2015, the national 8-hour ozone primary and secondary standards were lowered from 0.075 to 0.070 ppm.
- ⁹ On December 14, 2012, the national annual PM_{2.5} primary standard was lowered from 15 µg/m³ to 12.0 µg/m³. The existing national 24-hour PM_{2.5} standards (primary and secondary) were retained at 35 µg/m³, as was the annual secondary standards of 15 µg/m³. The existing 24-hour PM₁₀ standards (primary and secondary) of 150 µg/m³ also were retained. The form of the annual primary and secondary standards is the annual mean, averaged over 3 years.
- ¹⁰ To attain the 1-hour national standard, the 3-year average of the annual 98th percentile of the 1-hour daily maximum concentrations at each site must not exceed 100 ppb. Note that the national standards are in units of parts per billion (ppb). California standards are in units of parts per million (ppm). To directly compare the national standards to the California standards the units can be converted from ppb to ppm. In this case, the national standard of 100 ppb is identical to 0.100 ppm.
- ¹¹ On June 2, 2010, a new 1-hour SO₂ standard was established and the existing 24-hour and annual primary standards were revoked. To attain the 1-hour national standard, the 3-year average of the annual 99th percentile of the 1-hour daily maximum concentrations at each site must not exceed 75 ppb. The 1971 SO₂ national standards (24-hour and annual) remain in effect until 1 year after an area is designated for the 2010 standard, except that in areas designated nonattainment for the 1971 standards, the 1971 standards remain in effect until implementation plans to attain or maintain the 2010 standards are approved.
Note that the 1-hour national standard is in units of parts per billion (ppb). California standards are in units of parts per million (ppm). To directly compare the 1-hour national standard to the California standard the units can be converted to ppm. In this case, the national standard of 75 ppb is identical to 0.075 ppm.
- ¹² The CARB has identified lead and vinyl chloride as ‘toxic air contaminants’ with no threshold level of exposure for adverse health effects determined. These actions allow for the implementation of control measures at levels below the ambient concentrations specified for these pollutants.
- ¹³ The national standard for lead was revised on October 15, 2008 to a rolling 3-month average. The 1978 lead standard (1.5 µg/m³ as a quarterly average) remains in effect until 1 year after an area is designated for the 2008 standard, except that in areas designated nonattainment for the 1978 standard, the 1978 standard remains in effect until implementation plans to attain or maintain the 2008 standard are approved.
- ¹⁴ In 1989, the CARB converted both the general statewide 10-mile visibility standard and the Lake Tahoe 30-mile visibility standard to instrumental equivalents, which are “extinction of 0.23 per kilometer” and “extinction of 0.07 per kilometer” for the statewide and Lake Tahoe Air Basin standards, respectively.

Source: CARB 2015.

4.9.2 State

a. Criteria Pollutants

USEPA allows states the option to develop different (stricter) standards. The State of California has developed the California Ambient Air Quality Standards (CAAQS) and generally has set more stringent limits on the criteria pollutants. In addition to the federal criteria pollutants, the CAAQS also specify standards for visibility-reducing particles, sulfates, hydrogen sulfide, and vinyl chloride (see Table 4-3). The California CAA, also known as the Sher Bill or California AB 2595, was signed into law on September 30, 1988, and became effective on January 1, 1989. The California CAA requires that districts implement regulations to reduce emissions from mobile sources through the adoption and enforcement of transportation control measures. The California CAA also requires that a district must:

1. Demonstrate the overall effectiveness of the air quality program;
2. Reduce non-attainment pollutants at a rate of 5 percent per year, or include all feasible measures and an expeditious adoption schedule;

3. Ensure no net increase in emissions from new or modified stationary sources;
4. Reduce population exposure to severe non-attainment pollutants according to a prescribed schedule;
5. Include any other feasible controls that can be implemented, or for which implementation can begin, within 10 years of adoption of the most recent air quality plan; and
6. Rank control measures by cost-effectiveness. The SDAB is a non-attainment area for the State of California ozone standards, PM₁₀ standard, and PM_{2.5} standard.

b. Toxic Air Contaminants

The public's exposure to toxic air contaminants (TACs) is a significant public health issue in California. In 1983, the California Legislature enacted a program to identify the health effects of TACs and to reduce exposure to these contaminants to protect the public health (AB 1807: Health and Safety Code Sections 39650–39674). The Legislature established a two-step process to address the potential health effects from TACs. The first step is the risk assessment (or identification) phase. The second step is the risk management (or control) phase of the process.

The California Air Toxics Program establishes the process for the identification and control of TACs and includes provisions to make the public aware of significant toxic exposures and for reducing risk. Additionally, the Air Toxics "Hot Spots" Information and Assessment Act (AB 2588, 1987, Connelly Bill) was enacted in 1987 and requires stationary sources to report the types and quantities of certain substances routinely released into the air. The goals of the Air Toxics "Hot Spots" Act are to collect emission data, to identify facilities having localized impacts, to ascertain health risks, to notify nearby residents of significant risks, and to reduce those significant risks to acceptable levels. The Children's Environmental Health Protection Act, California SB 25 (Chapter 731, Escutia, Statutes of 1999), focuses on children's exposure to air pollutants. The act requires CARB to review its air quality standards from a children's health perspective, evaluate the statewide air monitoring network, and develop any additional air toxic control measures needed to protect children's health. Locally, toxic air pollutants are regulated through the San Diego APCD's Regulation XII.

Of particular concern statewide are diesel-exhaust particulate matter (DPM) emissions. DPM was established as a TAC in 1998 and is estimated to represent a majority of the cancer risk from TACs statewide (based on the statewide average). Diesel exhaust is a complex mixture of gases, vapors, and fine particles. This complexity makes the evaluation of health effects of diesel exhaust a complex scientific issue. Some of the chemicals in diesel exhaust, such as benzene and formaldehyde, have been previously identified as TACs by CARB and are listed as carcinogens under California's Proposition 65 or under the Federal Hazardous Air Pollutants program.

Following the identification of DPM as a TAC in 1998, CARB has worked on developing strategies and regulations aimed at reducing the risk from DPM. The overall strategy for achieving these reductions is found in the *Risk Reduction Plan to Reduce Particulate Matter Emissions from Diesel-fueled Engines and Vehicles* (State of California 2000). A stated goal of the plan is to reduce the cancer risk statewide arising from exposure to DPM 85 percent by 2020.

c. State Implementation Plan

The State Implementation Plan (SIP) is a collection of documents that set forth a state's strategies for achieving the NAAQS. In California, the SIP is a compilation of new and previously submitted plans, programs (such as monitoring, modeling, permitting, etc.), district rules, state regulations, and federal controls. CARB is the lead agency for all purposes related to the SIP under state law. Local air districts and other agencies, such as the Department of Pesticide Regulation and the Bureau of Automotive Repair, prepare SIP elements and submit them to CARB for review and approval. The CARB then forwards SIP revisions to the USEPA for approval and publication in the Federal Register. All of the items included in the California SIP are listed in 40 CFR 52.220.

The San Diego APCD is responsible for preparing and implementing the portion of the SIP applicable to the SDAB. The San Diego APCD adopts rules, regulations, and programs to attain state and federal air quality standards, and appropriates money (including permit fees) to achieve these objectives.

d. Regional Air Quality Strategy

The San Diego APCD prepared the 1991/1992 Regional Air Quality Strategy (RAQS) in response to the requirements set forth in AB 2595. The draft was adopted, with amendments, on June 30, 1992 (County of San Diego 1992). Attached, as part of the RAQS, are the Transportation Control Measures (TCMs) for the air quality plan prepared by SANDAG in accordance with AB 2595 and adopted by SANDAG on March 27, 1992, as Resolution Number 92-49 and Addendum. The required triennial updates of the RAQS and corresponding TCMs were adopted in 1995, 1998, 2001, 2004, and 2009. An update is currently being prepared based on the revised 8-hour ozone standard. The RAQS and TCMs set forth the steps needed to accomplish attainment of the CAAQS.

4.10 Greenhouse Gas Emissions

In response to rising concern associated with increasing GHG emissions and global climate change impacts, several plans and regulations have been adopted at the national, state, and local levels with the aim of reducing GHG emissions. Important federal, state, and local plans and regulations are summarized below.

4.10.1 Federal

a. Federal Clean Air Act

The U.S. Supreme Court ruled on April 2, 2007, in *Massachusetts v. U.S. Environmental Protection Agency* that carbon dioxide (CO₂) is an air pollutant, as defined under the CAA, and that USEPA has the authority to regulate emissions of GHGs. USEPA announced that GHGs (including CO₂, methane [CH₄], nitrous oxide [N₂O], hydrofluorocarbons [HFCs], perfluorocarbons [PFCs], and sulfur hexafluoride [SF₆]) threaten the public health and welfare of the American people. This action was a prerequisite to finalizing USEPA's GHG emissions standards for light-duty vehicles, which were jointly proposed by USEPA and DOT's National Highway Traffic Safety Administration (NHTSA). The standards were established on April 1, 2010, for 2012 through 2016 model year vehicles and on October 15, 2012, for 2017 through 2025 model year vehicles (USEPA 2010, 2012).

b. Climate Change Action Plan

Adopted in 1993, the U.S. Climate Change Action Plan (CCAP) consists of voluntary actions to reduce all significant GHGs from all economic sectors. Backed by federal funding, the CCAP supports cooperative partnerships between the government and the private sector in establishing flexible and cost-effective ways to reduce GHG emissions. The CCAP encourages investments in new technologies but also relies on previous actions and programs focused on saving energy, reducing transportation emissions, improving forestry management, and reducing waste. With respect to energy and transportation-related GHG emissions reductions, the CCAP includes the following:

1. Energy Demand Actions to accelerate the use of existing energy saving technologies and encourage the development of more advanced technologies. Commercial actions focus on installing efficient heating and cooling systems in commercial buildings and upgrading to energy-efficient lighting systems (the Green Lights program). The State Buildings Energy Incentive Fund provides funding to states for the development of public building energy management programs. Residential actions focus on developing new residential energy standards and building codes and providing money-saving energy efficient options to homeowners.
2. Energy Supply Actions to reduce emissions from energy supply. These actions focus on increasing the use of natural gas, which emits less CO₂ than coal or oil, and investing in renewable energy sources, such as solar and wind power, which result in zero net CO₂ emissions. Energy supply strategies also focus on reducing the amount of energy lost during distribution from power plants to consumers.
3. Transportation Actions to reduce transportation-related emissions are focused on investing in cleaner fuels and more efficient technologies, and reducing vehicle miles traveled (VMT). In addition, USEPA and DOT are to draft guidance documents for reducing VMT levels for use in developing local clean air programs.

c. Corporate Average Fuel Economy Standards

The federal Corporate Average Fuel Economy (CAFE) standards determine the fuel efficiency of certain vehicle classes in the United States. While the standards had not changed since 1990, as part of the Energy and Security Act of 2007, the CAFE standards were increased in 2007 for new light-duty vehicles to 35 miles per gallon (mpg) by 2020. In April 2010, USEPA and DOT's NHTSA announced a joint Final Rulemaking establishing standards for 2012 through 2016 model year vehicles. This was followed up on October 15, 2012, when the agencies issued a Final Rulemaking with standards for model years 2017 through 2025. The 2016 standard is equivalent to 35.5 miles per gallon (mpg), and the 2025 standard is equivalent to 54.5 mpg if the levels were achieved solely through improvements in fuel efficiency. The agencies expect, however, that a portion of these improvements will be made through improvements in air conditioning leakage and the use of alternative refrigerants that would not contribute to fuel economy.

4.10.2 State

The State of California has adopted a number of plans and regulations aimed at identifying statewide and regional GHG emissions caps, GHG emissions reduction targets, and actions and timelines to achieve the target GHG reductions.

a. Executive Order S-3-05 – Statewide GHG Emission Targets

This EO, signed on June 1, 2005, established the following GHG emission reduction targets for the state of California:

- by 2010, reduce GHG emissions to 2000 levels;
- by 2020 reduce GHG emissions to 1990 levels; and
- by 2050 reduce GHG emissions to 80 percent below 1990 levels.

This EO also directs the secretary of California EPA to oversee the efforts made to reach these targets, and to prepare biannual reports on the progress made toward meeting the targets and on the impacts to California related to global warming, including impacts to water supply, public health, agriculture, the coastline, and forestry. With regard to impacts, the report also includes mitigation and adaptation plans to combat the impacts. The first Climate Action Team Assessment Report was produced in March 2006 and has been updated every two years.

b. Executive Order B-30-15 – 2030 Statewide GHG Emission Goal

This EO, issued by Governor Brown on April 29, 2015, established an interim GHG emission reduction goal for the state of California: by 2030, reduce GHG emissions to 40 percent below 1990 levels. This EO also directed all state agencies with jurisdiction over GHG emitting sources to implement measures designed to achieve the new interim 2030 goal as well as the preexisting long-term 2050 goal identified in EO S-3-05 (see discussion below). Additionally, this EO directed CARB to update its AB 32 (Nuñez) mandated Scoping Plan (see discussion above) to address the 2030 goal. CARB is developing statewide inventory projection data for 2030 as well as commencing its efforts to identify reduction strategies capable of securing emission reductions that allow for achievement of the EO's new interim goal.

c. AB 32 – California Global Warming Solutions Act

In response to EO S-3-05, the California Legislature passed AB 32, the California Global Warming Solutions Act of 2006, which was signed on September 27, 2006. It requires that CARB adopt rules and regulations that would reduce GHG emissions to 1990 levels by 2020. CARB is also required to publish a list of discrete GHG emission reduction measures. As required by AB 32, CARB has established a statewide GHG emissions cap for 2020, and adopted reporting rules for large industrial sources and a Climate Change Scoping Plan (Scoping Plan).

d. Climate Change Scoping Plan

As directed by AB 32, the Scoping Plan prepared by CARB in December 2008 includes measures to reduce statewide GHG emissions to 1990 levels by 2020. These reductions are what CARB identified as necessary to reduce forecasted “Business As Usual” (BAU) 2020 emissions. CARB will update the

Scoping Plan at least once every 5 years to allow evaluation of progress made and to correct the Scoping Plan's course where necessary.

The 2008 Scoping Plan estimated annual BAU 2020 emissions to reach 596 MMT CO₂E. Thus, to achieve 1990 emissions levels of 427 MMT CO₂E, a 169 MMT CO₂E reduction would be needed by 2020. The majority of reductions are directed at the sectors with the largest GHG emissions contributions—transportation and electricity generation—and involve statutory mandates affecting vehicle or fuel manufacture, public transit, and public utilities. The CARB list of reductions is included in the technical GHG analysis in Appendix I.

Approved in May 2014, the First Update to the Scoping Plan defines CARB's priorities for the next 5 years and sets the groundwork to reach long-term goals set forth in EO S-3-05. The First Update describes advancements in climate science such as the quantification of the impacts of temperature change, further understanding of the mechanisms of climate pollutants (black carbon, CH₄, and HFCs), and improvements to GHG monitoring. The First Update also describes progress made since the original Scoping Plan, including implementation of a more comprehensive Cap-and-Trade Program, the Low Carbon Fuel Standard (LCFS), a 33 percent RPS, and an Advanced Clean Cars program that has been adopted at the federal level.

On December 14, 2017, the 2017 Scoping Plan Update was adopted, as directed by SB 32. The 2017 Scoping Plan Update will build on the state's successes to date and strengthen major programs that have been a hallmark of success. The 2017 Scoping Plan Update sets a strategy for achieving the state's 2030 target, 40 percent emissions reductions below 1990 levels, through enhancing industrial efficiency and competitiveness, prioritizing transportation sustainability, continuing to lead on clean energy, managing waste, supporting resilient agricultural and rural economies, securing water supplies, cleaning the air and public health, being a successful example of carbon pricing and investment.

e. AB 1493 – Vehicular Emissions of Greenhouse Gases

AB 1493 (Pavley) directed CARB to adopt vehicle standards that lowered GHG emissions from passenger vehicles and light-duty trucks to the maximum extent technologically feasible, beginning with the 2009 Model Year. CARB has adopted amendments to its regulations that would enforce AB 1493 but provide vehicle manufacturers with new compliance flexibility. Pavley standards are currently divided into two phases. Standards that regulate vehicles model years 2009 through 2016 are termed "Pavley I" standards for Model Years 2017 through 2025 were originally termed "Pavley II."

With these actions, it is expected that Pavley I will reduce GHG emissions from California passenger vehicles by a total of 31.5 MMT CO₂E counted toward the total pre-economic downturn statewide reduction target on the capped sector of 146.7 MMT CO₂E (CARB Scoping Plan). CARB adopted a second phase of the Pavley regulations, termed "Pavley II," which are now called the Low Emission Vehicle III (LEV III) Standards. LEV III covers Model Years 2017 through 2025. These reductions are to come from improved vehicle technologies such as small engines with superchargers, continuously variable transmissions, and hybrid electric drives.

f. Executive Order S-01-07 – Low Carbon Fuel Standard

This EO directed that a statewide goal be established to reduce the carbon intensity of California's transportation fuels by at least 10 percent by 2020 through an LCFS. CARB adopted the LCFS as a discrete early action measure pursuant to AB 32 in April 2009 and includes it as a reduction measure in its Scoping Plan.

The LCFS is a performance standard with flexible compliance mechanisms intended to incentivize the development of a diverse set of clean, low-carbon transportation fuel options. Its aim is to accelerate the availability and diversity of low-carbon fuels such as biofuels, electricity, and hydrogen by taking into consideration the full life cycle of GHG emissions. A 10 percent reduction in the intensity of transportation fuels is expected to equate to a reduction of 16.5 MMT CO₂E in 2020. However, to account for possible overlap of benefits between LCFS and the Pavley GHG standards, CARB has discounted the contribution of LCFS to 15 MMT CO₂E.

g. Senate Bill 375—Regional Emissions Targets

SB 375 was signed in September 2008 and requires CARB to set regional targets for reducing passenger vehicle GHG emissions in accordance with the Scoping Plan described above. Its purpose is to align regional transportation planning efforts, regional GHG reduction targets, and land use and housing allocation to reduce GHG emissions by promoting high-density, mixed-use developments around mass transit hubs.

The Scoping Plan prepared pursuant to AB 32 by CARB in 2008 and updated in 2014 identifies reduction targets for all sources of GHG emissions in the state. While the transportation sector is responsible for the greatest GHG reductions (nearly 30 percent of the total reductions), most of these reductions will come from higher fuel efficiency vehicles per the Pavley standards (18 percent) and a more diverse fuel mix per the low carbon fuel standards (9 percent). Statewide, RTPs prepared by Metropolitan Planning Organizations, such as SANDAG, are responsible for less than 3 percent of the GHG reductions. SB 375 is the mechanism that establishes GHG emission reduction targets for each regional agency.

SANDAG's SB 375 target is to reduce GHG emissions from cars and light trucks by 7 percent, per capita, by 2020, and by 13 percent by 2035, using a 2005 baseline as outlined in the ~~RP. The RP~~2015 Regional Plan. The 2015 Regional Plan, encompassing both the RTP and SCS, shows that the region will exceed these targets by pursuing the following strategies: using land in ways to make developments more compact, conserving open space, and investing in a transportation system that provides people with alternatives to driving alone.

h. California Energy Code

CCR Title 24, Part 6 is the California Energy Code. This code, originally enacted in 1978 in response to legislative mandates, establishes energy-efficiency standards for residential and non-residential buildings in order to reduce California's energy consumption. The Energy Code is updated periodically to incorporate and consider new energy-efficiency technologies and methodologies as they become available. The most recent amendments to the Energy Code, known as 2013 Title 24, or the 2013 Energy Code, became effective July 1, 2015. The 2013 Title 24 requires energy use reductions of 25 to 30 percent above the former 2008 Title 24 Energy Code

New construction and major renovations must demonstrate their compliance with the current Energy Code through submission and approval of a Title 24 Compliance Report to the local building permit review authority and CEC. The compliance reports must demonstrate a building's energy performance through use of CEC-approved energy performance software that shows iterative increases in energy efficiency given selection of various heating, ventilation, and air-conditioning (HVAC); sealing; glazing; insulation; and other components related to the building envelope. Title 24 governs energy consumed by the built environment by the major building envelope systems such as space heating, space cooling, water heating, some aspects of the fixed lighting system, and ventilation. Non-building energy use, and plug-in energy use (such as appliances, equipment, electronics, plug-in lighting) are independent of building design and are not subject to Title 24.

i. California Green Building Standards

CCR Title 24, Part 11 is the California Green Building Standards. Beginning in 2011, California Green Building Standards Code (CalGreen) instituted mandatory minimum environmental performance standards for all ground-up new construction of commercial and residential buildings, state-owned buildings, schools, and hospitals. It also includes voluntary tiers (I and II) with stricter environmental performance standards for these same categories of residential and non-residential buildings. Local jurisdictions must enforce the minimum mandatory requirements and may adopt CalGreen with amendments for stricter requirements.

The mandatory standards require:

- 20 percent mandatory reduction in indoor water use relative to specified baseline levels;
- 65 percent construction/demolition waste diverted from landfills (please note, AB 341 established a 75 percent diversion target; see Section 4.12.2.e);
- inclusion of electric vehicle charging stations or designated spaces capable of supporting future charging stations;
- mandatory inspections of energy systems to ensure optimal working efficiency; and
- requirements for low-pollutant emitting exterior and interior finish materials such as paints, carpets, vinyl flooring, and particle boards.

The voluntary standards require:

- Tier I – 15 percent improvement in energy requirements, stricter water conservation requirements for specific fixtures, 65 percent reduction in construction waste, 10 percent recycled content, 20 percent permeable paving, 20 percent cement reduction, cool/solar reflective roof, and electrical vehicle charging; and
- Tier II – 30 percent improvement in energy requirements, stricter water conservation requirements for specific fixtures, 75 percent reduction in construction waste, 15 percent recycled content, 30 percent permeable paving, 25 percent cement reduction, cool/solar reflective roof, and electrical vehicle charging.

Similar to the compliance reporting procedure described above for demonstrating code compliance under Title 24, Part 6, in new buildings and major renovations, compliance with the CalGreen water reduction

requirements must be demonstrated through completion of water use reporting forms for new residential and non-residential buildings. The water use compliance forms must demonstrate a 20 percent reduction in indoor water use by either showing a 20 percent reduction in the overall baseline water use as identified in CalGreen or a reduced per-plumbing-fixture water use rate.

The CARB Scoping Plan includes a Green Building Strategy with the goal of expanding the use of green building practices to reduce the carbon footprint of new and existing buildings. Consistent with CalGreen, the Scoping Plan recognized that GHG reductions would be achieved through buildings that exceed minimum energy-efficiency standards, decrease consumption of potable water, reduce solid waste during construction and operation, and incorporate sustainable materials. CPUC, CEC, and CARB have a shared goal of achieving zero net energy for new construction in California. The key policy timelines include: (1) all new residential construction in California will be zero net energy by 2020, and (2) all new commercial construction in California will be zero net energy by 2030. Green building is thus a vehicle to achieve the Scoping Plan's statewide electricity and natural gas efficiency targets, and lower GHG emissions from waste and water transport sectors.

In the Scoping Plan, CARB projects that an additional 26.3 MMT CO₂E could be reduced through expanded green building standards. However, this reduction is not counted toward the BAU 2020 reduction goal to avoid any double counting, as most of these reductions are accounted for in the electricity, waste, and water sectors. Because of this, CARB has assigned all emissions reductions that occur because of green building strategies to other sectors for meeting AB 32 requirements but will continue to evaluate and refine the emissions from this sector.

j. Senate Bill 97—CEQA GHG Amendments

SB 97 (Dutton), passed by the Legislature and signed on August 24, 2007, required the Office of Planning and Research on or before July 1, 2009, to prepare, develop, and transmit to the Resources Agency amendments to the CEQA Guidelines to assist public agencies in the evaluation and mitigation of GHGs or the effects of GHGs as required under CEQA, including the effects associated with transportation and energy consumption. SB 97 required the Resources Agency to certify and adopt those guidelines by January 1, 2010. Proposed amendments to the CEQA Guidelines for GHG emissions were submitted on April 13, 2009, adopted on December 30, 2009, and became effective March 18, 2010.

Section 15065.4 of the amended CEQA Guidelines includes the following requirements for determining the significance of impacts from GHG emissions:

- (a) The determination of the significance of greenhouse gas emissions calls for a careful judgment by the lead agency consistent with the provisions in section 15065. A lead agency should make a good-faith effort, based to the extent possible on scientific and factual data, to describe, calculate, or estimate the amount of GHG emissions resulting from a project. A lead agency shall have discretion to determine, in the context of a particular project, whether to:
 - 1) Use a model or methodology to quantify greenhouse gas emissions resulting from a project, and which model or methodology to use. The lead agency has discretion to select the model or methodology it considers most appropriate provided it supports its decision with substantial evidence. The lead agency should explain the limitations of the particular model or methodology selected for use; and/or

- 2) Rely on a qualitative analysis or performance-based standards.

While the amendments require calculation of a project's contribution, they clearly do not establish a standard by which to judge a significant effect or a means to establish such a standard.

k. Senate Bill 32 and Assembly Bill 197

In September 2016, Governor Brown signed SB 32 (Chapter 249, Statutes of 2016) and AB 197 (Chapter 250, Statutes of 2016), which require the State to reduce GHG emissions to at least 40 percent below 1990 levels by 2030 and invest in the communities most affected by climate change. SB 32 codifies the 2030 GHG emissions reduction goal established by EO B-30-15, issued by Governor Brown in 2015. AB 197 establishes a legislative committee on climate change policies to help continue the State's activities to reduce GHG emissions.

4.10.3 Local

a. San Diego Forward: The Regional Plan (2015 Regional Plan)

Refer to Section 4.1.5 for a discussion of SANDAG's RP2015 Regional Plan.

b. City of San Diego General Plan (2008)

The City's General Plan includes several climate change-related policies aimed at reducing GHG emissions from future development and City operations. For example, Conservation Element policy CE-A.2 aims to "reduce the City's carbon footprint" and to "develop and adopt new or amended regulations, programs, and incentives as appropriate to implement the goals and policies set forth" related to climate change. The Land Use and Community Planning Element; the Mobility Element; the Urban Design Element; and the Public Facilities, Services, and Safety Element also identify GHG reduction and climate change adaptation goals. These elements contain policy language related to sustainable land use patterns, alternative modes of transportation, energy efficiency, water conservation, waste reduction, and greater landfill efficiency. The overall intent of these policies is to support climate protection actions, while retaining flexibility in the design of implementation measures, which could be influenced by new scientific research, technological advances, environmental conditions, or state and federal legislation.

One specific concept introduced in the General Plan is the City of Villages strategy, which proposes growth to be directed into pedestrian-friendly, mixed-use activity centers linked to an improved regional transit system. The City of Villages strategy shifts the focus of land use policies to encourage infill development and reinvest in existing communities. Locating different land use types near one another can decrease mobile emissions. Thus, the development of dense urban "villages" would generate less GHG emissions. The City of Villages strategy can be seen as an effort to avoid what is commonly referred to as "urban sprawl."

Cumulative impacts of GHG emissions were qualitatively analyzed and determined significant and unavoidable in the PEIR for the General Plan. A PEIR Mitigation Framework was included that indicated "for each future project requiring mitigation (measures that go beyond what is required by existing programs, plans, and regulations), project-specific measures will [need to] be identified with the goal of

reducing incremental project-level impacts to less than significant; or the incremental contributions of a project may remain significant and unavoidable where no feasible mitigation exists.”

c. Climate Action Plan

In December 2015, the City adopted a CAP. The CAP identifies measures to meet GHG reduction targets for 2020 and 2035. The CAP consists of a 2010 inventory of GHG emissions, a BAU projection for emissions at 2020 and 2035, state targets, and emission reductions with implementation of the CAP. The City identifies GHG reduction strategies focusing on energy- and water-efficient buildings; clean and renewable energy; bicycling, walking, transit, and land use; zero waste; and climate resiliency. Accounting for future population and economic growth, the City projects GHG emissions will be approximately 15.9 MMT CO₂E in 2020 and 16.7 MMT CO₂E in 2035. To achieve its proportional share of the state reduction targets for 2020 (AB 32) and 2050 (EO S-3-05), the City would need to reduce emissions below the 2010 baseline by 15 percent in 2020 and 50 percent by 2035. To meet these goals, the City must implement strategies that reduce emissions to approximately 11.0 MMT CO₂E in 2020 and 6.5 MMT CO₂E in 2035. Through implementation of the CAP, the City is projected to reduce emissions even farther below targets by 1.2 MMT CO₂E by 2020 and 205,462 MTCO₂E by 2035.

4.11 Public Services and Facilities

4.11.1 State

a. Government Code Section 65995/Senate Bill 50

SB 50 was signed into law in 1998, imposing limitations on the power of cities and counties to require mitigation of school facilities' impacts as a condition of approving new development. It also authorizes school districts to levy statutory developer fees at a higher rate for residential development than previously allowed. SB 50 amended Government Code Section 65995(a) to provide that only those fees expressly authorized by law (Education Code Section 17620 or Government Code Sections 65970, et seq.) may be levied or imposed in connection with or made conditions of any legislative or adjudicative act by a local agency involving planning, use, or development of real property.

4.11.2 Local

The City requires payment of Development Impact Fees (DIFs) to collect a proportional fair share cost of capital improvements needed to offset the impact of the development (SDMC Section 142.0640). DIFs are based on community-specific financing plans completed when Community Plans are updated. Financing plans were formerly known as PFFPs and are now referred to as IFSs.

The General Plan Public Facilities, Services and Safety Element includes a number of policies that address financing of public facilities and specifies that IFSs should be completed concurrent with preparation of Community Plan updates, should set community-level priorities for facility financing, and ensure new development pays its proportional fair share of public facilities costs through payment of DIFs. Facility types that are eligible for DIF funding include transportation, storm drains, parks and recreation, fire-rescue, police, and libraries.

a. Police

As specified in the City's General Plan, Public Facilities, Services, and Safety Element, Policy PF-E.2, the City's goal is to maintain average response time goals as development and population growth occurs. Average response time guidelines are as follows:

- Priority E Calls (imminent threat to life) within 7 minutes
- Priority 1 Calls (serious crimes in progress) within 12 minutes
- Priority 2 Calls (less serious crimes with no threat to life) within 30 minutes
- Priority 3 Calls (minor crimes/requests that are not urgent) within 90 minutes
- Priority 4 Calls (minor requests for police service) within 90 minutes

b. Parks

The General Plan provides standards for population-based parks and recreation facilities, which include recreation centers and aquatic complexes. The standard for population-based parks is 2.8 usable acres per 1,000 residents, which can be achieved through a combination of neighborhood and community parks and park equivalencies. The standard for a recreation center is a minimum of 17,000 square feet per recreation center to serve a population of 25,000. The standard for an aquatic complex is one per 50,000 people or within approximately 6 miles.

c. Fire

The Fire-Rescue Department has an active program that promotes the clearing of canyon vegetation away from structures in accordance with Section 142.0412 of the SDMC and the San Diego Fire-Rescue Department's Canyon Fire Safety guidelines and policies related to brush management. The City thins brush on City property within 100 horizontal feet of a previously conforming structure unless a site-specific report, which indicates that a greater distance is necessary, is approved by the San Diego Fire-Rescue Department (per SDMC Section 142.0412(i) or a previously recorded entitlement requires a width more or less than the standard 100 feet. Other fire prevention measures include adopting safety codes and an aggressive brush management program. Citywide fire service goals, policies, and standards are located in the Public Facilities, Services, and Safety Element of the General Plan and the Fire-Rescue Services Department's Fire Service Standards of Response Coverage Deployment Study.

Response time standards are provided in the General Plan Public Facilities, Services, and Safety Element and summarized below:

- a. To treat medical patients and control small fires, the first-due unit should arrive within 7.5 minutes, 90 percent of the time from the receipt of the 911 call in fire dispatch. This equates to 1-minute dispatch time, 1.5 minutes company turnout time, and 5-minute drive time in the most populated areas.
- b. To provide an effective response force for serious emergencies, a multiple-unit response of at least 17 personnel should arrive within 10.5 minutes from the time of 911-call receipt in fire dispatch, 90 percent of the time.

- This response is designed to confine fires near the room of origin, to stop wildland fires to under three acres when noticed promptly, and to treat up to five medical patients at once.
- This equates to 1-minute dispatch time, 1.5 minutes company turnout time, and 8-minute drive time spacing for multiple units in the most populated areas.

To direct fire station location timing and crew size planning as the community grows, fire unit deployment performance measures are established based on population density zones and are provided in Table 4-4.

	Structure Fire Urban Area	Structure Fire Rural Area	Structure Fire Remote Area	Wildfires Populated Areas
	>1,000-people/sq. mi.	1,000 to 500 people/sq. mi.	500 to 50 people/sq. mi.*	Permanent open space areas
1 st Due Travel Time	5	12	20	10
Total Reflex Time	7.5	14.5	22.5	12.5
1 st Alarm Travel Time	8	16	24	15
1 st Alarm Total Reflex	10.5	18.5	26.5	17.5

Notes: Reflect time is the total time from receipt of a 9-1-1 call to arrival of the required number of emergency units
Source: Citygate 2017

The following population based performance measures are used to plan for needed facilities. Where more than one square mile is not populated at similar densities, and/or a contiguous area with different zoning types aggregates into a population “cluster,” these measures guide the determination of response time measures (Table 4-5) and the need for fire stations.

Area	Aggregate Population	First-Due Unit Travel Time Goal
Metropolitan	> 200,000 people	4 minutes
Urban-Suburban	< 200,000 people	5 minutes
Rural	500 to 1,000 people	12 minutes
Remote	< 500	> 15 minutes

Source: Citygate 2017

4.12 Public Utilities

Groundwater recharge using recycled water is governed primarily by state and local agencies. The primary agencies involved are the California Department of Public Health, the SWRCB, and the local RWQCB. The federal government does not have direct jurisdiction over groundwater. However, it should be noted that because surface water quality may affect groundwater, and because the USEPA has a role

in setting wastewater treatment requirements and standards for surface water discharges, some federal regulations may be applied indirectly to groundwater recharge projects.

4.12.1 State

a. California Integrated Waste Management Act of 1989

The California Integrated Waste Management Act of 1989 (AB 939) was enacted to reduce, recycle, and reuse solid waste generated in the state to the maximum extent feasible. Specifically, this Act requires city and county jurisdictions to identify an implementation schedule to divert 50 percent of the total waste stream from land disposal by the year 2000 through source reduction, recycling, and composting activities, and requires the participation of the residential, commercial, industrial, and public sectors.

4.12.2 Local

a. Water Supply

SB 610 requires water suppliers to prepare a Water Supply Assessment (WSA) report for inclusion by land use agencies during the CEQA process for new developments subject to SB 221. SB 221 requires water suppliers to prepare written verification that sufficient water supplies are planned to be available prior to approval of large-scale subdivision of land under the State Subdivision Map Act. Large-scale projects include residential development of more than 500 units, shopping centers or businesses employing more than 1,000 people, shopping centers or businesses having more than 500,000 square feet of floor space, commercial office buildings employing more than 1,000 people, and/or commercial buildings having more than 250,000 square feet of floor space or occupying more than 40 acres of land. SB 221 and SB 610 went into effect January 2002 with the intention of linking water supply availability to land use planning by cities and counties.

The City's PUD prepared a WSA report for the project (July 2017), which are included as Appendix L to this PEIR. The WSA reports were prepared for the project to assess whether sufficient water supplies are, or will be, available to meet the projected water demands associated with the proposed land use scenarios. Because no subdivision of land is proposed as part of this project, the WSA reports were prepared in compliance with the requirements of SB 610. The WSA reports include, among other information, identification of existing water supply entitlements, water rights, water service contracts, or agreements relevant to the identified water supply for the project, and quantities of water received in prior years pursuant to those entitlements, rights, contracts, and agreements.

b. Wastewater

Council Policy 400-13 identifies the need to provide maintenance access to all sewers in order to reduce the potential for spills. The policy requires that environmental impacts from access paths in environmentally sensitive areas should be minimized to the maximum extent possible through the use of sensitive access path design, canyon-proficient maintenance vehicles, and preparation of plans that dictate routine maintenance and emergency access procedures.

Council Policy 400-14 outlines a program to evaluate the potential to redirect sewage flow out of canyons and environmentally sensitive areas to an existing or proposed sewer facility located in City streets or other accessible locations. The policy includes an evaluation procedure that requires both a physical evaluation and a cost-benefit analysis. Based on the analysis, if redirection of flow outside the canyon is found to be infeasible, a Long-Term Maintenance and Emergency Access Plan is required. The plan would be specific to the canyon evaluated, and would prescribe long-term access locations for routine maintenance and emergency repairs along with standard operating procedures identifying cleaning methods and inspection frequency.

The City's Sewer Design Guide sets forth criteria to be used for the design of sewer systems, which may consist of pump stations, gravity sewers, force mains, and related appurtenances. It includes criteria for determining capacity and sizing of pump stations, gravity sewers and force mains, alignment of gravity sewers and force mains, estimating wastewater flow rates, design of bridge crossings, and corrosion control requirements.

c. Water Distribution

The City's Water Facility Design Guidelines identify general planning, predesign, and design details and approaches to be used for water infrastructure. The guidelines provide uniformity in key concepts, equipment types, and construction materials on facilities built under the Water CIP. These design guidelines assist in providing professionally sound, efficient, uniform, and workable facilities, whether pipelines, pressure control facilities, pumping stations, or storage facilities.

d. Communication Facilities

City Council Policy 600-43 established a set of comprehensive guidelines for the review and processing of applications for the placement and design of Wireless Communication Facilities in accordance with the City of San Diego land use regulations. These guidelines are intended to prescribe clear, reasonable, and predictable criteria to assess and process applications in a consistent and expeditious manner, while reducing visual and land use impacts associated with Wireless Communication Facilities. For applicants seeking placement of a Wireless Communication Facility on City-owned land, this policy should be used in conjunction with applicable Council policies and LDC Section 141.0420.

e. Solid Waste and Recycling

The California Legislature passed AB 939 to address landfill capacity and solid waste concerns in 1989. The Integrated Waste Management Act mandated that all cities reduce waste disposed in landfills from generators within their borders by 50 percent by the year 2000. The law also required local governments to prepare Source Reduction and Recycling elements detailing how these reductions would be achieved. In 2011, the State enacted AB 341, which established a policy goal for California of 75 percent recycling, composting, or source reduction of solid waste by 2020. In July 2012, the City updated the Recycling Ordinance to lower the exemption threshold for required recycling, thereby requiring all privately serviced businesses, commercial/institutional facilities, apartments, and condominiums generating four or more cubic yards of trash per week to recycle. The City is currently at a 67 percent diversion rate (City of San Diego 2016). Pursuant to the City's Significance Determination Thresholds, any land development project of more than 40,000 square feet that may generate approximately 60 tons of waste or more during construction and/or operation is required to prepare a project-specific Waste Management Plan (WMP) to

address management of waste generated during short-term project construction and long-term post-construction operation. The WMP is required to identify how the project would reduce waste and achieve target reduction goals.

4.13 Biological Resources

4.13.1 Federal

a. Endangered Species Act

The federal Endangered Species Act (ESA) of 1973, as amended (16 U.S.C. 1531 et seq.), provides for a listing of endangered and threatened species of plants and animals and a designation of critical habitat for listed animal species. The ESA also prohibits all persons subject to U.S. jurisdiction from “taking” endangered species, which includes any harm or harassment. Section 7 of the ESA requires that federal agencies, prior to project approval, consult USFWS and/or the National Marine Fisheries Service to ensure adequate protection of listed species that may be affected by the project.

b. Migratory Bird Treaty Act

The Migratory Bird Treaty Act (MBTA) (16 U.S.C. 703 et seq.) is a federal statute that implements treaties with several countries on the conservation and protection of migratory birds. The list of bird species covered by the MBTA is extensive and is detailed in 50 CFR 10.13. The regulatory definition of “migratory bird” is broad and includes any mutation or hybrid of a listed species, including any part, egg, or nest of such a bird (50 CFR 10.12). Migratory birds are not necessarily federally listed endangered or threatened birds under the ESA. The MBTA, which is enforced by USFWS, makes it unlawful “by any means or in any manner, to pursue, hunt, take, capture, [or] kill” any migratory bird or attempt such actions, except as permitted by regulation. The applicable regulations prohibit the take, possession, import, export, transport, sale, purchase, barter, or offering of these activities, except under a valid permit or as permitted in the implementing regulations (50 CFR 21.11).

c. U.S. Army Corps of Engineers

The USACE has primary federal responsibility for administering regulations that concern waters and wetlands in the project area. In this regard, the USACE acts under two statutory authorities, the Rivers and Harbors Act (33 U.S.C., Sections 9 and 10), which governs specified activities in navigable waters, and the Clean Water Act (Section 404), which governs specified activities in waters of the United States, including wetlands and special aquatic sites. Wetlands and non-wetland waters (e.g., rivers, streams, and natural ponds) are a subset of waters of the United States and receive protection under Section 404 of the Clean Water Act. The USACE has primary federal responsibility for administering regulations that concern waters and wetlands in the project area under statutory authority of the Clean Water Act (Section 404). In addition, the regulations and policies of various federal agencies mandate that the filling of wetlands be avoided to the maximum extent feasible. The USACE requires obtaining a permit if a project proposes placing structures within navigable waters and/or alteration of waters of the United States.

4.13.2 State

a. California Endangered Species Act

Similar to the federal ESA, the California ESA of 1970 provides protection to species considered threatened or endangered by the State of California (California Fish and Game Code, Section 2050 et seq.). The California ESA recognizes the importance of threatened and endangered fish, wildlife, and plant species and their habitats, and prohibits the taking of any endangered, threatened, or rare plant and/or animal species unless specifically permitted for education or management purposes.

b. California Fish and Game Code

The California Fish and Game Code regulates the handling and management of the state's fish and wildlife. Most of the code is administered or enforced by the CDFW (before January 1, 2013, California Department of Fish and Game). Two sections of the code generally apply to public infrastructure projects:

Section 1602 regulates activities that would divert or obstruct the natural flow or substantially change the bed, channel, or bank of any river, stream, or lake that supports fish or wildlife. CDFW has jurisdiction over riparian habitats associated with watercourses. Jurisdictional waters are delineated by the outer edge of riparian vegetation or at the top of the bank of streams or lakes, whichever is wider. CDFW jurisdiction does not include tidal areas or isolated resources.

Section 3503 makes it unlawful to take, possess, or needlessly destroy the nest or eggs of any bird, except as otherwise provided by the code.

c. Porter-Cologne Water Quality Control Act

Refer to Section 4.7.2 for discussion of the Porter-Cologne Water Quality Control Act.

4.13.3 Local

a. Multiple Species Conservation Program

Refer to Section 4.1.3 for discussion of the MSCP, MHPA, and MHPA Land Use Adjacency Guidelines.

b. City of San Diego Environmentally Sensitive Lands (ESL) Regulations

The purpose of the ESL Regulations is to “protect, preserve, and, where damaged restore, the environmentally sensitive lands of San Diego and the viability of the species supported by those lands. These regulations are intended to assure that development occurs in a manner that protects the overall quality of the resources and the natural and topographic character of the area, encourages a sensitive form of development, retains biodiversity and interconnected habitats, maximizes physical and visual public access to and along the shoreline, and reduces hazards due to flooding in specific areas while minimizing the need for construction of flood control facilities. These regulations are intended to protect the public health, safety, and welfare while employing regulations that are consistent with sound resources conservation principles and the rights of private property owners.” ESL Regulations cover sensitive biological resources, including wetlands, within and outside of the coastal zone and MHPA.

Future development proposed in accordance with the proposed CPU would be required to comply with all applicable ESL Regulations.

c. Biology Guidelines

In September 1991, the City's Biology Guidelines, part of the Land Development Manual, were adopted, to aid in the implementation and interpretation of the ESL Regulations (SDMC Chapter 14, Article 3, Division 1) and the OR-1-2 Zone (SDMC Chapter 13, Article 1, Division 2). Section III of the Biology Guidelines serve as standards for the determination of impact and mitigation under CEQA and the Coastal Act. The guidelines are the baseline biological standards for processing Neighborhood Development Permits, Site Development Permits, and Coastal Development Permits issued pursuant to the ESL.

d. City of San Diego General Plan Policies

The General Plan establishes Citywide policies to be cited in conjunction with a Community Plan. The General Plan presents goals and policies for biological resources in the Conservation Element.

4.14 Paleontological Resources

Under California law, paleontological resources are protected by CEQA; the CCR, Title 14, Division 3, Chapter 1, Sections 4307 and 4309; and Public Resources Code Section 5097.5. Pursuant to Section 15065 of the CEQA Guidelines (CCR Sections 15000–15387), a lead agency must find that a project would have a significant effect on the environment when the project has the potential to eliminate important examples of the major periods of California prehistory, including significant paleontological resources. The City's Paleontological Guidelines (July 2002) and Significance Determination Thresholds (July 2016) are used to make this determination.

This page intentionally left blank.



Chapter 5.0 Environmental Analysis

The following sections analyze the potential environmental impacts that may occur as a result of implementation of the project. The environmental issues addressed in this chapter include the following:

- Land Use
- Transportation and Circulation
- Historical and Tribal Cultural Resources
- Geologic Conditions
- Noise
- Health and Safety
- Hydrology/Water Quality
- Visual Effects and Neighborhood Character
- Air Quality
- Greenhouse Gas Emissions
- Public Service and Facilities
- Public Utilities
- Biological Resources
- Paleontological Resources

Each issue analysis section is formatted to include a description of existing conditions (or a reference to Chapter 2.0 for existing conditions), the criteria for the determination of impact significance, evaluation of potential project impacts including cumulative impacts, mitigation measures if applicable, and conclusion of significance after mitigation for impacts identified as requiring mitigation.

This page intentionally left blank.

5.1 Land Use

This section discusses existing land use and the consistency of the project with applicable plans and regulations. This section analyzes the potential that implementation of the proposed CPU would permit designation or intensity of use that would have indirect or secondary environmental impacts. As discussed in Section 3.4, Project Description, the land use is analyzed at build-out using a total dwelling unit yield for a maximum projection. ~~This is based on the assumption. The total dwelling unit yield reflects assumptions that some properties would not redevelop at the greater maximum permitted residential density while others will be developed; other properties would develop at residential densities below the maximum due to development constraints and market conditions; and other sites may develop with a higher density above maximum~~ as permitted under state and local density bonus regulations.

5.1.1 Existing Conditions

The existing environmental setting and regulatory framework are summarized in Chapters 2.0 and 4.0, respectively.

5.1.2 Significance Determination Thresholds

The determination of significance regarding any inconsistency with development regulations or plan policies is evaluated in terms of the potential for the inconsistency to result in environmental impacts considered significant under CEQA. Thresholds used to evaluate potential impacts related to land use are based on applicable criteria in the CEQA Guidelines Appendix G and the City of San Diego CEQA Significance Determination Thresholds (2016). Thresholds are modified from the City's CEQA Significance Determination Thresholds to reflect the programmatic analysis for the proposed CPU. A significant land use impact would occur if implementation of project would:

- 1) 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;
- 2) Lead to development or conversion of General Plan or Community Plan designated open space or prime farmland to a more intensive land use, resulting in a physical division of the community;
- 3) Conflict with the provisions of the City's Multiple Species Conservation Program (MSCP) Subarea Plan or other approved local, regional, or state habitat conservation plan; or
- 4) Result in land uses which are not compatible with an adopted Airport Land Use Compatibility Plan (ALUCP).

Issues addressed in the City's CEQA Significance Determination Thresholds that are not addressed in this document include whether the project would increase the base flood elevation for upstream

properties, or construct in a Special Flood Hazard Area (SFHA) or floodplain/wetland buffer zone. During initial project scoping, it was determined that implementation of the project would not result in significant impacts related to increases in the base flood elevation or construction in an SFHA or floodplain/wetland buffer zone because existing LDC regulations would adequately address potential impacts related to grading within an SFHA (SDMC, Chapter 14, Article 2, Division 2 Drainage Regulations and Chapter 14, Article 3, Division 1 Environmentally Sensitive Lands Regulations). Thus, there is no further discussion of this issue area.

5.1.3 Impact Analysis

Issue 1 Conflicts with Applicable Plans

Would the 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?

a. City of San Diego General Plan

The project is intended to further express General Plan policies in the proposed CPU area through the provision of community specific policies and guidelines and site-specific recommendations that implement Citywide goals and policies, address community needs, and guide zoning. The proposed CPU and General Plan work together to establish the framework for growth and development for Old Town San Diego. The proposed CPU contains nine elements, each providing community and sub-district specific goals and policies. These goals and policies are consistent with the general goals and policies stated in the General Plan. Table 5.1-1, provides a comprehensive list of all proposed CPU policies for each element to be referenced in the following land use analysis. Additionally, a description of the proposed land uses and allowed densities are referenced in Table 3-2 in Section 3.0, Project Description. Locations of proposed land uses are shown in Figure 3-1 of Chapter 3.0, Project Description.

**Table 5.1-1
Proposed CPU Policies Related to Land Use**

Policy	Description
Land Use Element	
Historic Core Sub-District	
LU-4.6	Support relocating surface parking from the Historic Core to visitor-oriented parking facilities within the Taylor Sub-District.
LU-4.11	Consider the expansion of the <u>Old Town San Diego</u> State Historic Park to incorporate the area north of Juan Street and east of Taylor Street to Mason Street, which includes the Casa de Carrillo historical landmark and other historical resources.
Core Sub-District	
LU-5.1	Maintain and enhance the Core as the central commercial/retail area of the Old Town San Diego community.
LU-5.3	Encourage retail (including small-scale grocery), specialty retail, and eating establishment uses for visitors and residents.
LU-5.4	Expand the sense of the Core as a small town by creating small professional offices and studios for artists and design-oriented professionals.
LU-5.4(a)	Allow professional offices and studios at both the ground floor level and upper floors of buildings along Congress Street.
LU-5.4(b)	Allow professional offices and studios above or behind street-level retail uses along San Diego Avenue.

Table 5.1-1 Proposed CPU Policies Related to Land Use	
Policy	Description
LU-5.5	Encourage indoor-outdoor eating establishments, bazaars, and similar primarily visitor-oriented activities.
LU-5.6	Encourage pedestrian- and visitor-oriented retail uses to occupy the ground floor frontages, including, but not limited to, art galleries, variety stores, gift shops, and sidewalk cafes.
LU-5.7	Support shopkeeper units that provide craftsmen and artisans the ability to live, work, and sell their products.
LU-5.8	Encourage buildings that have residential above or behind street-level commercial uses.
LU-5.10	Consider the use of the City-owned parking lot on Twiggs Street as a plaza for public gatherings including, but not limited to, community events or an outdoor market, should replacement parking be provided below grade or in the Taylor Sub-District or in another location outside of the Core.
Hortensia Sub-District	
LU-6.1	Allow a mix of retail, office, hotel, and residential uses in Hortensia, which can be combined within a single building or in multiple buildings.
LU-6.2	Allow ground-floor residential uses and shopkeeper units in Hortensia.
LU-6.3	Support public and/or private uses at the Ballard Parent Center site.
LU-6.4	Allow properties in Hortensia with a lot area of 20,000 square feet or greater designated as Community Commercial - Residential Permitted (0-25 du/ac) and Mixed Commercial Residential (0-25 du/ac) to be redeveloped up to a 1.0 floor area ratio if all buildings are consistent with the maximum historical precedent building sizes and policies in Urban Design Element Section 5.1.
Heritage Sub-District	
LU-7.1	Encourage active use of the historic Victorian structures with community- and visitor-serving uses that are compatible with the character of Heritage Park.
LU-7.2	Support Heritage Park as a County park dedicated to the preservation of San Diego's Victorian architecture and structures.
Taylor Sub-District	
LU-8.1	Encourage transit-oriented residential and mixed-commercial residential uses within the area along Pacific Highway, north of Taylor Street.
LU-8.4	Encourage hotel uses and stand-alone or shared visitor-oriented parking uses.
LU-8.6	Support the development of a parking structure for transit- and visitor-oriented parking at the Old Town Transit Center parking lot along Pacific Highway.
Residential Sub-Districts	
LU-9.2	Allow the development of additional single-family homes and multi-family homes on larger parcels while still maintaining older single-family and bungalow homes.
LU-9.5	Protect and maintain single-family homes within the Mason Sub-District.
Hillside Sub-District	
LU-10.1	Allow a mix of hotel, commercial, and residential uses in Hillside, which can be combined within a single building or in multiple buildings.
LU-10.5	Encourage pedestrian-oriented commercial and hotel uses along Harney Street and Conde Street.
LU-10.6	Allow ground-floor residential uses along Juan Street in Hillside.
Urban Design Element	
Site Design	
UD-4.1	Incorporate plazas, courtyards, patios, porches, and/or paseos within new development where appropriate.
UD-4.2	Link plazas, courtyards, patios, porches, and paseos to public pedestrian areas visually and physically.
UD-4.19	Design and locate parking areas in relation to buildings in a manner that the exposure of parked vehicles to the public view and the street is minimized, for example at the rear of buildings, behind architectural features, or by taking advantage of the site's topography.
Noise Element	
Noise	
NE-1.3	Ensure that any future residential and other noise-sensitive land uses adjacent to I-5 and I-8 adequately attenuate freeway noise.

The City of San Diego's General Plan Historic Preservation Element guides the preservation, protection, restoration, and rehabilitation of historical and cultural resources related to Native American occupation of

the area and the extensive historic occupation as the first Spanish Presidio and Mission settlements. The **Historic Preservation Element** of the proposed CPU provides general policies to preserve significant historical resources and identifies 22 additional potentially historic properties and one potentially historic district. This element calls for the identification and preservation of significant historical resources, as well as educational opportunities and incentives relative to historical resources in Old Town. Impacts relative to historical resources are discussed in Section 5.3, Historical Resources.

The **Land Use Element** of the proposed CPU contains community-specific policies to guide development within the Old Town community. This element establishes the distribution and pattern of land uses throughout the community along with associated residential densities.

Old Town is a community with an established land use pattern that is expected to remain with commercial and mixed-use located along San Diego Avenue, multi-family and single-family uses located adjacent to commercial areas, and open space/parks located in the northern and central areas of the community. The community has a unique level of complexity due to historically and culturally significant development history and the large amount of park space. Policies within the Land Use Element are constructed to promote the overall land use goals of the proposed CPU, which include maintaining Old Town as a residential community as well as a visitor attraction where residents can walk to the Core, the Old Town Transit Center, historic and cultural attractions, and parks. Commercial policies include providing for a variety of commercial uses ranging from retail to office to visitor commercial. Park policies include preserving and enhancing the Old Town San Diego State Historic Park, Presidio Park, and Heritage Park.

As with the General Plan, the proposed CPU places an emphasis on the General Plan's "City of Villages" concept of walkable and pedestrian-friendly neighborhoods with a mix of uses. Prior to the adoption of the General Plan, Old Town was already in a position to promote "village-like" development with an ample mix of pedestrian-oriented residential, commercial, and public space served by the Old Town Transit Center. Old Town is expected to see an improved level of walkability, bicycling, and transit through the implementation of mobility-related projects and improvements and efforts that are focused within the identified sub-districts and streets.

The proposed CPU would also be consistent with the General Plan goal of providing diverse and balanced neighborhoods and communities. The land use plan prepared for the proposed CPU provides for a combination of land uses that emphasize the existing diversity of the community, as well as a diversity that supports future growth near the Old Town Transit Center and prosperity within the proposed CPU area.

The existing development within Old Town provides a foundation for achievement of the goals laid out in the General Plan Mobility Element due to the urban character of the community, existing transit connections, and adjacency to major roadways and interstates. The proposed CPU **Mobility Element** policies support maintaining the existing grid network of streets while enhancing the pedestrian and bicyclist environment to improve the public realm and strengthen connections between visitor destinations, parks, the Core, the Old Town Transit Center, and the San Diego River Park. The proposed CPU also includes Intelligent Transportation System policies that promote the application of technology to transportation systems with the goal to maximize efficiency of services while increasing vehicle throughput, reducing congestion, and smart parking technologies.

The **Urban Design Element** of the proposed CPU supports and implements the General Plan at the Community Plan level by including specific design guidelines and policies that guide new development to accurately reflect the architectural period characteristic of Old Town San Diego prior to 1871 and ensure compatibility with Old Town's existing historical and small town character. The proposed CPU addresses existing and planned access to outdoor and park spaces, and identifies active and passive open space areas, recreational facilities, and access via pedestrian and bicycle pathways.

The **Economic Prosperity Element** supports the continuation, improvement, and expansion of the cultural heritage and tourism industry and related businesses by implementing land use policies, urban design guidance, and mobility improvement policies related to access to transit and visitor parking. This element also identifies the value of hotel and visitor uses, special events, retail goods and service uses, and office uses.

Consistent with the Public Facilities, Services, and Safety Element of the General Plan, the proposed CPU **Public Facilities, Services, and Safety Element** includes goals to provide and maintain infrastructure and public services for future growth without diminishing services to existing development. Specific policies regarding police, fire, and rescue services; education and public libraries; utilities; maintenance, landscaping, and lighting; water and sewer infrastructure; and health and safety, are all included within the proposed CPU.

In regard to the Recreation Element of the General Plan, the proposed CPU also provides **Recreation Element** policies that capitalize on the community's location, history, and walkability. The proposed CPU focuses on population-based parks and recreation facilities to serve the recreational needs of Old Town San Diego residents. The resource-based Presidio Park, County of San Diego's Heritage Park, and the Old Town San Diego State Historic Park are major visitor-serving parks for the community and the San Diego region that contain important historic landmarks and are not counted within the community's population-based parks total acreage. Policies within the proposed CPU regarding population-based parks are centered on providing improvements to existing parks to enhance recreational value to the community's residents. The proposed CPU also recommends improvements to existing trails within Presidio Park to provide additional recreational opportunities and add additional population-based parkland.

With implementation of the improvements to the Presidio Park Trails, the Old Town community would not have a population-based park deficit at full community development. In addition, there would be no recreation center or aquatic complex deficit with implementation of the Proposed NTC/Liberty Station Aquatic Complex. The existing recreation center at Presidio Park would continue to meet community needs based on the projected household population in 2035.

The proposed CPU is consistent with the conservation policies contained within the Conservation Element of the General Plan. The **Conservation Element** of the proposed CPU addresses the conservation goals and policies that can be effective in managing, preserving, and thoughtfully using the natural resources of the community. Climate change is also addressed in a manner consistent with the General Plan. Sustainable energy policies are included that encourage implementation of energy- and water-efficient measures for commercial uses that exceed California Code, such as providing more efficient laundry and kitchen machinery; promoting the continued use or adaptive reuse of existing buildings; and educating residents, employees, and visitors about the accessibility of transit, community destinations, and regional recreational resources via walking and bicycling.

With respect to the General Plan policies concerning noise and land use compatibility, the **Noise Element** of the proposed CPU includes goals and policies to guide compatible land uses and require the incorporation of noise attenuation measures for new uses. Additionally, this element provides additional detail to General Plan policies. Please see Section 5.5 for a discussion of noise impacts.

As part of the project analyzed within this PEIR, the City is updating the IFS (formerly PFFP) for the Old Town community, which was adopted in 2003. The IFS sets forth the major public facilities' needs specific to the Old Town community with respect to transportation (streets, storm drains, traffic signals, etc.), park and recreation facilities, and fire stations. The proposed CPU is a guide for the future development within the community and serves to determine public facility needs. Revisions to public facility needs, Development Impact Fees (DIFs), or other capital improvement programs would be included in the updated IFS.

b. Land Development Code Regulations

Implementation of the actions associated with adoption of the proposed CPU would include amendments to the Old Town PDO to implement the proposed CPU. The Old Town PDO is within Chapter 15 of the LDC and implements the Community Plan policies through zoning and development regulations. Implementation of the proposed CPU also includes amendments to SDMC Chapter 14, Article 2, Division 12 related to sign requirements to implement and be consistent with the proposed CPU, and to SDMC Chapter 13, Article 2, Division 9 to apply the Residential Tandem Parking Overlay Zone to the Old Town community as a whole. As such, the revised PDO and amendments to the sign and parking requirements would implement the proposed CPU and ensure that the community's historical character is maintained through the use of tailored development standards. Therefore, impacts would be less than significant.

ESL Regulations

Environmentally sensitive lands (ESL; e.g., sensitive biological resources, steep hillsides, coastal beaches, sensitive coastal bluffs, and special flood hazard areas) occur within the proposed CPU area. Any future development proposed on ESL would be subject to the City's ESL Regulations (Chapter 14, Article 3, Division 1), which require that future projects demonstrate that the proposed development site is physically suitable for the proposed use and that it would minimize disturbance to natural landforms and not increase flood hazards. In the event a future specific project is considered for an ESL regulation deviation, supplemental findings would be required prior to approval to show that development would not result in an additional public safety threat or extraordinary public expense, or create a public nuisance. Adherence to these regulations would avoid significant impacts to ESL within the proposed CPU area; therefore, impacts would be less than significant.

Historical Resources Regulations

The Historical Resources Regulations (Section 143.0213(a) of the LDC) apply when historical resources are present. As defined by the HRR, historical resources include: historical buildings, historical structures or historical objects, important archaeological sites, historical districts, historical landscapes, and traditional cultural properties. The proposed CPU areas contain known historic resources, including resources listed in the NRHP and the San Diego Historical Resources Register.

The Land Use, Villages, and Districts, Urban Design, and Historic Preservation Elements of the proposed CPU contains policies to promote the preservation and renovation of existing historical structures, as well as to identify and designate new historical buildings for protection and restoration.

Implementation of the proposed CPU is expected to result in development and redevelopment that may impact historical and tribal cultural resources. Direct impacts may include alteration or demolition of historic buildings, as well as impacts to archaeological sites from grading, excavation and other ground-disturbing activities tied to construction. Given the presence of historical, archaeological and tribal cultural resources distributed throughout the proposed CPU area, implementation of the CPU has the potential to result in significant impacts to historical and tribal cultural resources. The CPU includes several policies aimed to reduce impacts to historical and tribal cultural resources within the CPU area. Adherence to the City's Historical Resources Regulations would avoid significant impacts to historical resources within the project area; therefore, impacts would be less than significant.

c. San Diego Forward – The Regional Plan (2015 Regional Plan)

The proposed CPU land use scenario would be consistent with the goals of the RP2015 Regional Plan, prepared by SANDAG to develop compact, walkable communities close to transit connections and consistent with smart growth principles, as summarized above. The proposed CPU proposes to establish a pedestrian-oriented community that would reduce reliance on the automobile and promote walking, bicycling, and the use of alternative transportation. Policies contained within the proposed CPU Land Use and Mobility elements serve to promote transit use and connectivity to the Old Town Transit Center as well as other forms of mobility, including walking and bicycling. These measures are consistent with the RP's 2015 Regional Plan's smart growth strategies. The adoption and implementation of the proposed CPU would not generate any conflict or inconsistencies with the RP2015 Regional Plan; therefore, the potential impacts would be less than significant.

Issue 2 Conversion of Open Space or Farmland

Would the project lead to the development or conversion of general plan or community plan designated open space or prime farmland to a more intensive land use, resulting in a physical division of the community?

The project involves an update to the Old Town San Diego Community Plan, a fully built-out community in the City of San Diego, and other associated discretionary actions. The current makeup of the urbanized Old Town community includes a mix of predominantly park, residential, and commercial land uses that include open space. Designated open space within the community is the Old Town San Diego State Historic Park and San Diego County's Heritage Park; designated park space within the community is Presidio Park (Community Park) (City of San Diego 2008). There is no prime farmland within the community (City of San Diego 2008). The provision of enhanced pedestrian corridors and bicycle amenities, as well as enhanced connectivity to the Old Town Transit Center and the community's parks/open space would additionally serve to foster community connectivity rather than create division.

The proposed CPU Conservation Element contains policies that preserve parks/open space within the community. In addition, the proposed CPU would not result in conversion of parks/open space. Therefore, implementation of the project would not lead to the development or conversion of designated open space

or prime farmland or physically divide the community and would not result in any policies that would permit the conversion of open space in adjacent communities. Impacts would be less than significant.

Issue 3 Conflicts with the MSCP Subarea Plan

Would the project conflict with the provisions of the City's Multiple Species Conservation Program (MSCP) Subarea Plan or other approved local, regional, or state habitat conservation plan?

MSCP Plan

The MSCP Plan was developed to maximize conservation of sensitive biological resources, including sensitive species. The MSCP Plan is a comprehensive plan that addresses multiple species habitat needs and the preservation of native vegetation communities for a 900-square-mile area in southwestern San Diego County. The MSCP Plan was approved in 1997 and covers 85 species. The City of San Diego, portions of the unincorporated County and ten additional city jurisdictions make up the MSCP Plan area. The MSCP Plan allows local jurisdictions to maintain land use control and development flexibility by planning a regional preserve system that meets future public and private project mitigation needs.

The MSCP Subarea Plan is the local subset of the regional MSCP Plan. The entire proposed CPU area lies within the City's MSCP Subarea Plan planning area and contains MHPAs which at build out will be 90 percent or more preserved to make up the final MSCP Preserve. Because the proposed CPU area contains MHPA lands, City ESL Regulations apply and limit development encroachment into MHPA and areas with sensitive biological resources. However, the MHPA within the proposed CPU area is located within Presidio Park and therefore is not likely to be subject to development impacts.

The San Diego River Flood Control Channel, directly north of the proposed CPU area, is an important open space resource and is within the MHPA. The river is home to wildlife species, including seasonal bird populations in the tidal estuary. The estuary also acts as a natural bio-filter for storm water runoff before it enters the Pacific Ocean. The City's MHPA Land Use Adjacency Guidelines manage land uses adjacent to the flood control channel to ensure minimal impacts to the MHPA. When land is developed adjacent to the MHPA, there is a potential for secondary impacts that may degrade the habitat value or disrupt animals within the preserve area. These secondary effects of project development may include habitat insularization, drainage/water quality impacts, lighting, noise, exotic plant species, nuisance animal species, and human intrusion. These impacts could be short term resulting from construction activities, or long term.

Impacts could result in disruption of nesting and breeding, thus affecting the population of sensitive species. To address these concerns, the MSCP includes a set of MHPA Land Use Adjacency Guidelines that are to be evaluated and implemented at the project level. Adherence to these guidelines would avoid significant impacts to adjacent MHPA lands within the proposed CPU area.

As concluded in Section 5.13, Biological Resources, future project specific development proposals would be required to be consistent with the MSCP Subarea Plan, and as such, impacts would be less than significant.

Issue 4 Conflicts with an Adopted ALUCP

Would the project result in land uses which are not compatible with an adopted Airport Land Use Compatibility Plan (ALUCP)?

The proposed CPU area is located within the SDIA AIA. The AIA is "the area in which current or future airport-related noise, overflight, safety, or airspace protection factors may significantly affect land uses or necessitate restrictions on those uses" (San Diego County Regional Airport Authority 2014). To facilitate implementation and reduce unnecessary referrals of projects to the ALUC, the AIA is divided into Review Area 1 and Review Area 2. The proposed CPU area is located within Review Area 2 (Figure 5.1-1). The composition of each area is determined as follows:

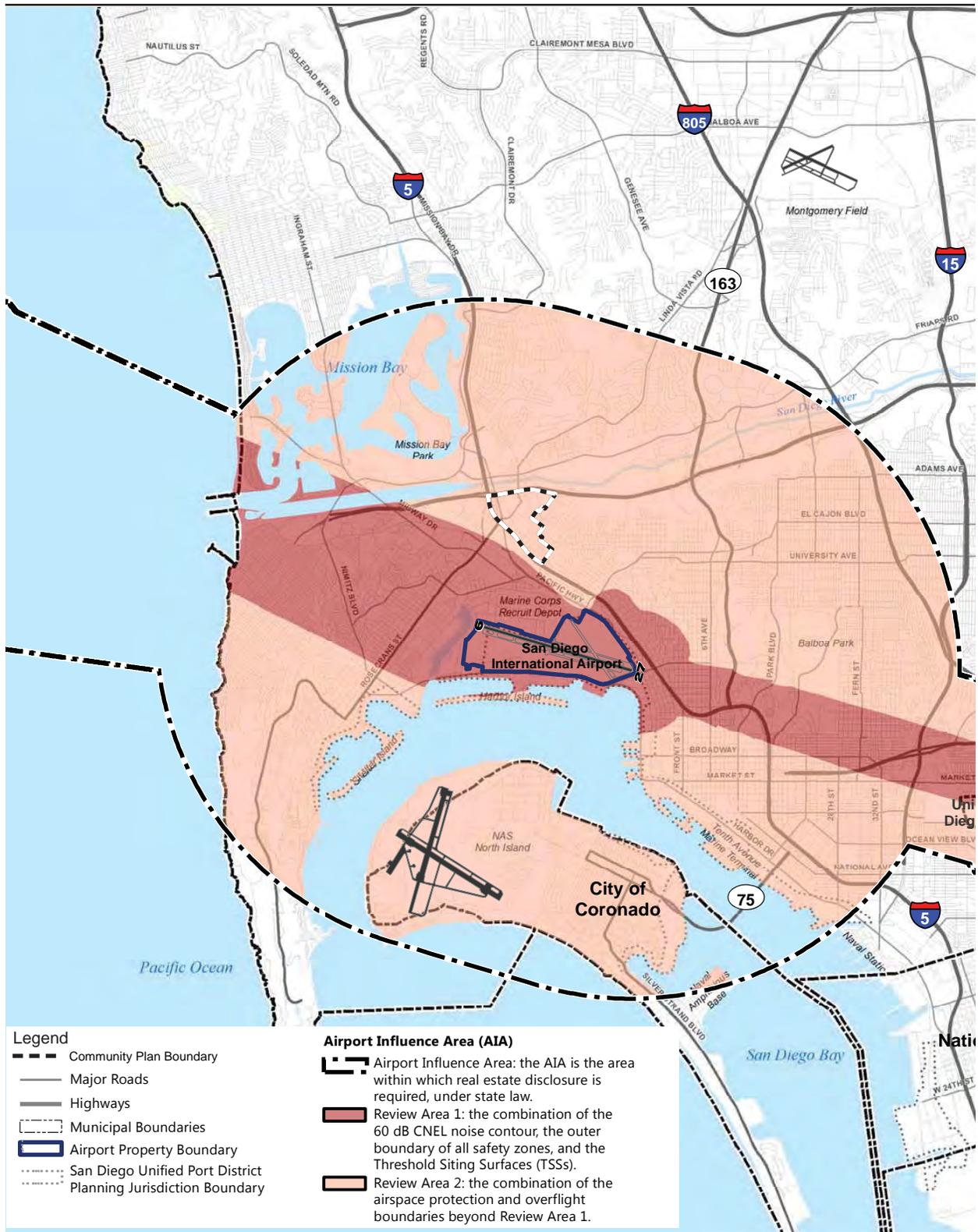
- Review Area 1 is defined by the combination of the 60 dB CNEL noise contour, the outer boundary of all safety zones, and the airspace Threshold Siting Surfaces (TSSs) (Figure 5.1-2). All policies and standards apply within Review Area 1.
- Review Area 2 is defined by the combination of the airspace protection and overflight boundaries beyond Review Area 1. Only airspace protection and overflight policies and standards apply within Review Area 2.

The ALUCP contains four principal compatibility concerns: noise (exposure to aircraft noise), safety (land use factors that affect safety both for people on the ground and occupants of aircraft), airspace protection (protection of airport airspace), and overflight (annoyance or other general concerns related to aircraft overflights). The ALUCP policies and standards are only applicable to new uses. The proposed CPU is not located within the SDIA noise contours of the ALUCP. Additionally, the proposed CPU is not located within any SDIA Safety Compatibility Zones or TSSs of the ALUCP.

Noise impacts are fully evaluated in Section 5.5, Noise, of this PEIR. As discussed in Section 5.5 of this PEIR, the proposed CPU would not result in adverse airport noise impacts to existing uses because no portions of the proposed CPU are located within any of the noise level CNEL contours presented in the ALUCP. Though aircraft departures are audible throughout the proposed CPU area, CNEL levels attributed to SDIA will not exceed 60 dBA CNEL. Neither exterior nor interior noise compatibility impacts would occur at any of the project land uses, and impacts related to exposure to noise from aircraft would be less than significant.

The airspace protection boundary (Figure 5.1-2) for SDIA establishes the area where the policies and standards of the ALUCP apply. The Old Town community is located within the Federal Aviation Regulations Part 77 Notification Surfaces. The City requires an FAA determination of no hazard to air navigation for both ministerial and discretionary projects that exceed the Part 77 Notification Surfaces prior to approving or recommending approval as addressed in Planning Department Information Bulletin 520. As such, impacts to airspace protection would be less than significant.

Overflight compatibility concerns apply to the proposed CPU area. The Old Town community is located entirely within the Overflight Notification Area (Figure 5.1-3). An overflight notification agreement must be recorded with the Office of the County Recorder for any new dwelling unit within the overflight area. The recordation of an overflight notification agreement is not necessary where the dedication of an aviation easement is required. Alternative methods of providing overflight notification are acceptable if approved



Source: SDIA - ALUCP

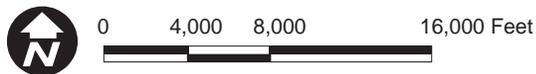


Figure 5.1-1
SDIA Airport Influence Area



Figure 5.1-2
SDIA Airspace Protection Boundary

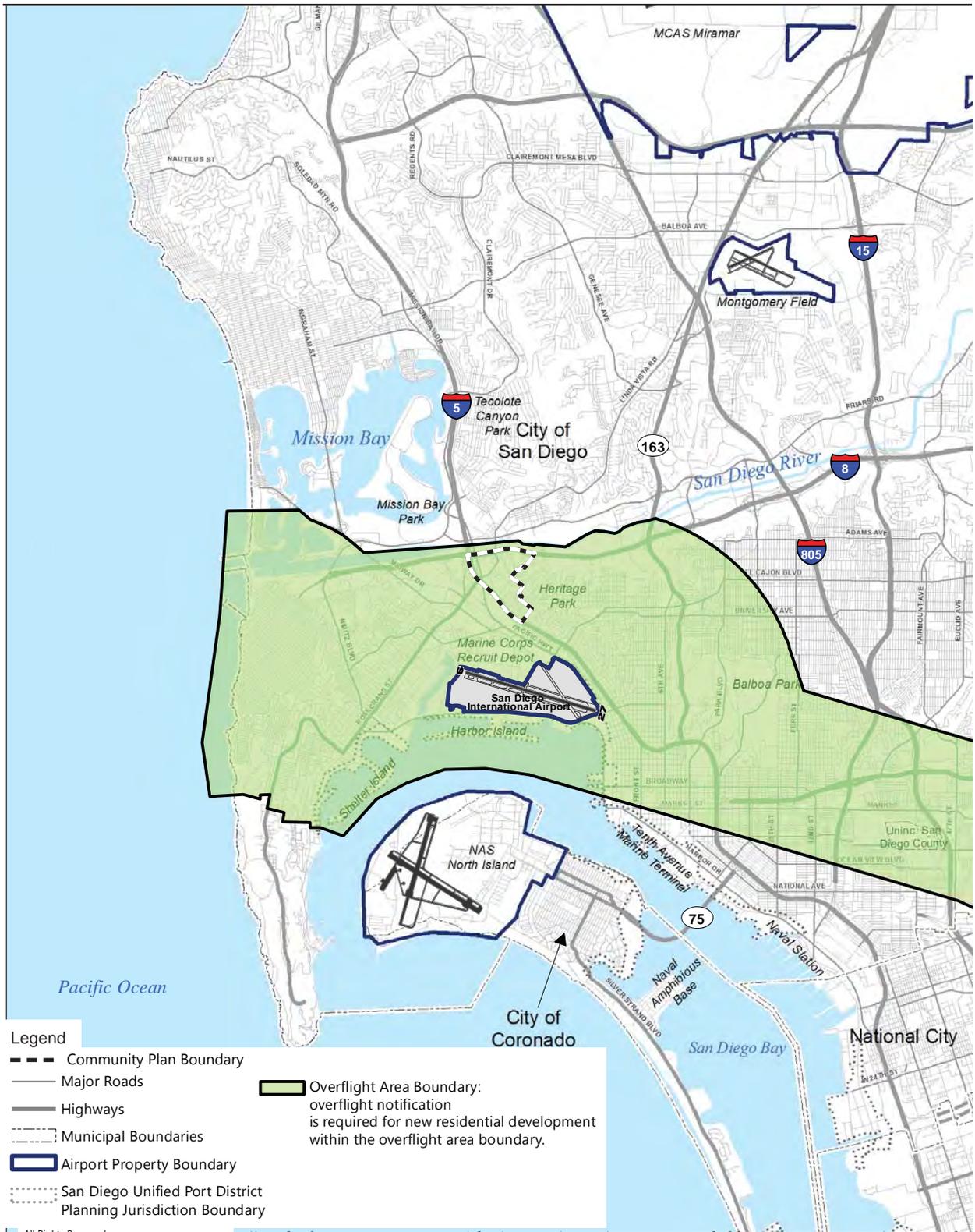


Figure 5.1-3
SDIA Overflight Notification Area

by the ALUC. The City has included the FAA Part 77 airspace noticing requirements and overflight noticing within the Airport Land Use Compatibility Overlay Zone in Chapter 13 of the LDC.

Prior to the proposed CPU going into effect, the project would be submitted by the City to the ALUC to determine consistency with the ALUCP. Thus, as described in this section, implementation of the proposed CPU would be consistent with the adopted ALUCP as future development within the proposed CPU area would be subject to the requirements of the ALUCP and associated FAA and City requirements. In a letter dated February 16, 2018, the San Diego County Regional Airport Authority determined that the proposed CPU is conditionally consistent with the ALUCP at a programmatic level and reiterated that the City must refer future projects under the proposed CPU to the ALUC for project-level consistency determinations for those projects located within the overflight notification area.

Therefore, impacts related to conflicts with an adopted ALUCP would be less than significant.

5.1.4 Significance of Impacts

5.1.4.1 Conflicts with Applicable Plans

The project would be consistent with the General Plan and the City of Villages strategy. Furthermore, the policies developed for the proposed CPU associated with each of the elements were drafted in a manner that is consistent with the General Plan. Proposed revisions to the Old Town PDO and parking and signage requirements would be consistent with applicable environmental goals, objectives and guidelines of the General Plan. These proposed amendments are intended to encourage future development consistent with the proposed CPU.

Future development in accordance with the proposed CPU would be required to comply with the ESL Regulations. Future development in accordance with the proposed CPU would also be required to comply with the City's HRR to protect designated and eligible historical resources in the proposed CPU area. The proposed CPU incorporates the multi-modal strategy of the ~~RP2015~~ Regional Plan through the designation of a high-density mixed-use village. In addition, the proposed CPU includes policies related to land use, mobility, and circulation/transportation that promote the ~~San Diego Forward~~ 2015 Regional Plan smart growth strategies. As the project would be consistent with applicable environmental goals, objectives, or guidelines of a General Plan and other applicable plans and regulations, no indirect or secondary environmental impact would result, and impacts would be less than significant. No mitigation is required.

5.1.4.2 Conversion of Open Space or Farmland

The project would not convert open space or prime farm land. The project would not physically divide an established community. Community connectivity would be enhanced by policies and planned infrastructure improvements in the proposed CPU that improve pedestrian, bicycle, and transit access and amenities. Impacts would be less than significant, and no mitigation is required.

5.1.4.3 Conflicts with the MSCP Subarea Plan

Although the proposed CPU contains areas mapped within the MHPA in Presidio Park, any subsequent projects implemented in accordance with the proposed CPU would be required to comply with the

provisions of the MSCP Subarea Plan. Compliance with the SDMC and MSCP Subarea Plan would be assured during review of future project specific development proposals where ESL and the MHPA is present on-site, and therefore, implementation of the proposed CPU would not be in conflict with the MSCP Subarea Plan, and impacts would be less than significant. No mitigation is required.

5.1.4.4 Conflicts with an Adopted ALUCP

Although the Old Town community is within the SDIA AIA Review Area 2, the project would not result in impacts associated with the four compatibility concern areas. The proposed CPU ~~and implementation actions will be~~ was submitted to the ALUC to obtain for a consistency determination with the SDIA ALUCP and was deemed conditionally consistent as future projects would be required to submit project-level consistency determinations. Future projects would be required to receive ALUC consistency determinations, as necessary, stating that the project is consistent with the SDIA ALUCP until such time as the City adopts regulations implementing the ALUCP or takes action to overrule the ALUC by a two-thirds vote. As a result, the project would not result in land uses that are incompatible with an adopted ALUCP. Therefore, impacts would be less than significant, and no mitigation is required.

5.1.5 Mitigation Framework

Land use impacts related to the project would be less than significant. Thus, no mitigation is required.

5.2 Transportation and Circulation

Chen Ryan Associates prepared the Midway-Pacific Highway & Old Town Mobility Element Updates Transportation Impact Study (TIS) (December 2017). The report is included as Appendix B to this PEIR. In March 2017, Chen Ryan Associates prepared the Midway-Pacific Highway and Old Town Communities Mobility Report. The report is included as Appendix C to this PEIR and the results of the report pertinent to the proposed CPU are presented in this section.

The technical analysis for the Transportation and Circulation section assumed the highest density land use alternative and corresponding trip generation. A TIS was prepared for the proposed project and is included in Appendix B of the PEIR. ~~The As discussed in Section 3.4, Project Description, the land use assumption assume~~ is analyzed using a total dwelling unit yield. The total dwelling unit yield reflects assumptions that some properties would not-redevelop at the greater maximum permitted residential density while others will be developed; other properties would develop at residential densities below the maximum due to development constraints and market conditions; and other sites may develop with a higher density above maximum as permitted under state and local density bonus regulations.

5.2.1 Existing Conditions

The existing environmental setting and regulatory framework are summarized in Chapters 2.0 and 4.0, respectively. This existing roadway circulation network; daily and peak-hour traffic volumes; and operations at the study roadway segments, intersections, freeway segments, and freeway ramps pertinent to the proposed CPU area are discussed below.

5.2.1.1 Roadway Network

The following section provides a description of the existing study area streets within the proposed CPU area. The portions of the roadways described are intended to reflect the areas within the community and may not reflect the entirety of the roadway. Functional classifications are based on field observations performed during preparation of the TIS. Existing and planned roadway classifications for the Old Town community are shown in Figure 3-3 in Chapter 3, Project Description. Please note that existing and planned street classifications are the same. The City of San Diego Bicycle Master Plan (City BMP) identifies few bicycle facilities in the community, as noted in the descriptions below.

Congress Street functions as a 2-lane collector with a pavement width of 36 feet between Taylor Street to San Diego Avenue/Ampudia Street. Congress Street is lined with curbs and sidewalks and has parallel on-street parking on sides of the roadway. The street abuts the Old Town Transit Center and commercial, parkland, residential, and school land uses, and has a posted speed limit of 25 miles per hour (mph). This street is classified as a Class III (Bike Route) facility.

San Diego Avenue functions as a 2-lane collector between Twiggs Street and the community boundary with Uptown, south of Hortensia Street. San Diego Avenue is lined with curbs and sidewalks and has

parallel on-street parking on both sides of the roadway along most of its length. The street abuts commercial and residential uses and has a posted speed limit of 25 mph. The pavement width ranges from 40 to 52 feet. No bicycle facilities exist on the street, except for the segment from Ampudia Street to the community boundary with Uptown, south of Hortensia Street, which is classified as a Class III (Bike Route) facility.

Juan Street functions as a 2-lane collector with parallel on-street parking on both sides of the street between Taylor Street and the community boundary with Uptown. Juan Street is lined with curbs and sidewalks and has a pavement width of 36 feet. The street abuts commercial, institutional, residential, and parkland uses and has a posted speed limit of 30 mph.

Taylor Street functions as a 4-lane major arterial (from Pacific Highway/Rosecrans Street to Congress Street), a 5-lane major arterial (from Congress Street to Juan Street), a 4-lane major arterial (from Juan Street to Morena Boulevard), and a 2-lane collector (from Morena Boulevard to I-8 Eastbound [EB] Ramps). Taylor Street is lined with curbs and sidewalks with the exception of the segment from Morena Boulevard to I-8 EB Ramps where there are only curbs. There is no on-street parking along the roadway. The pavement width ranges from 40 feet (from Morena Boulevard to I-8 EB Ramps) to 94 feet (from Pacific Highway/Rosecrans Street to Congress Street). The street abuts the Old Town Transit Center and institutional, commercial, and parkland uses, and the posted speed limit is 35 mph. There are no bicycle facilities from Pacific Highway/Rosecrans Street to Presidio Drive, but Class II (Bike Lane) facilities exist from Presidio Drive to the I-8 EB Ramps.

Twiggs Street functions as a 2-lane collector from Congress Street to Juan Street and has a pavement width of 30 feet. The roadway is lined with curbs and sidewalks. There is no on-street parking from Congress Street to San Diego Avenue, but there is parallel on-street parking on both sides of the roadway from San Diego Avenue to Juan Street. The street abuts commercial, residential and institutional land uses and has a posted speed limit of 25 mph. There are no bicycle facilities.

Old Town Avenue functions as a 2-lane collector from Hancock Street to San Diego Avenue and has a pavement width of 28 feet from Hancock Street to Moore Street, and 38 feet from Moore Street to San Diego Avenue. The street is lined with curbs and sidewalks only on the southeast side of the roadway from Hancock Street to Moore Street, and on both sides of the roadway from Moore Street to San Diego Avenue. The street abuts commercial land uses and has a posted speed limit of 25 mph. There is no on-street parking or bicycle facilities. (*Note: this roadway segment is located partly within both the Midway-Pacific Highway and Old Town community planning areas.*)

Pacific Highway functions as a 2-lane collector with a center left turn lane between Sea World Drive and Taylor Street, and has a pavement width of 86 feet. The roadway is lined with curbs and sidewalks and parallel on-street parking on both sides of the roadway. The road abuts transportation related utilities and has a posted speed limit of 45 mph. Class II (Bike Lane) facilities are present on both sides of the roadway.

Morena Boulevard functions as a 3-lane major arterial with a striped and raised median between Taylor Street and the I-8 Interstate, and has a pavement width of 56 feet. The roadway is lined with curbs and sidewalks and abuts commercial and freeway facilities on both sides and does not have a posted speed limit. There is no on-street parking or bike facilities.

5.2.1.2 Roadway Segment Conditions

To determine the impacts on the study area (the study area is larger than the proposed CPU area) roadway segments, Table 5.2-1 has been developed by the City of San Diego and is used as a reference. The segment traffic volumes under LOS E as shown in this table are considered at capacity because, at LOS E, the volume to capacity (v/c) ratio is equal to 1.0.

Based on planning-level analysis using Average Daily Traffic (ADT) volumes, it is estimated that all roadway segments within the proposed CPU area function at an acceptable LOS D or better, except for the following segments. The segments listed below have volumes above their existing capacity, resulting in periods of congestion.

- San Diego Avenue between Ampudia Street and Old Town Avenue (LOS F)
- Taylor Street between Morena Boulevard and I-8 EB Ramps (LOS F)
- Old Town Avenue between Hancock Street and Moore Street (LOS F)¹

Road Class	Lanes	A	B	C	D	E
Expressway	6	<30,000	<42,000	<60,000	<70,000	<80,000
Prime Arterial	6	<25,000	<35,000	<50,000	<55,000	<60,000
Prime Arterial	5	<20,000	<28,000	<40,000	<45,000	<50,000
Major Arterial	6	<20,000	<28,000	<40,000	<45,000	<50,000
Major Arterial	5	<17,500	<24,500	<35,000	<40,000	<45,000
Major Arterial	3	<11,250	<15,750	<22,500	<26,250	<30,000
Major Arterial (one-way)	3	<12,500	<16,500	<22,500	<25,000	<27,500
Major Arterial	4	<15,000	<21,000	<30,000	<35,000	<40,000
Collector (with center left-turn lane)	5	<12,500	<17,500	<25,000	<30,750	<37,500
Collector (with center left-turn lane)	4	<10,000	<14,000	<20,000	<25,000	<30,000
Collector (with center left-turn lane)	3	<7,500	<10,500	<15,000	<18,750	<22,500
Collector (with no center lane)	4	<5,000	<7,000	<10,000	<13,000	<15,000
Collector (with center left-turn lane)	2					
Collector (one-way)	2	<7,500	<9,500	<12,500	<15,000	<17,500
Collector (no fronting property)	2	<4,000	<5,500	<7,500	<9,000	<10,000
Collector (with commercial fronting)	2	<2,500	<3,500	<5,000	<6,500	<8,000
Collector (multi-family fronting)	2					
Sub-Collector (single-family)	2	–	–	<2,200	–	–

Notes:

The volumes and the average daily level of service listed above are only intended as a general planning guideline.

Levels of service are not applied to residential streets since their primary purpose is to serve abutting lots, not carry through traffic.

Levels of service normally apply to roads carrying through traffic between major trip generators and attractors.

Capacities for any classification not identified in the sources noted below were developed based on interpolation from similar classifications.

Sources: City of San Diego Traffic Impact Study Manual, Table 2, Page 8, July 1998
City of San Diego Planning Department Mobility Section

¹ This segment is located partially within the Midway Pacific Highway and the Old Town CPU areas, and is within the study area.

5.2.1.3 Intersection Conditions

The TIS (Chen Ryan Associates 2017; Appendix B) includes a LOS analysis for the study intersections within the proposed CPU area under Existing Conditions. LOS for signalized intersections is defined in terms of delay, which is a measure of driver discomfort, frustration, fuel consumption, and loss of travel time. Specifically, LOS criteria are stated in terms of the average control delay per vehicle for the peak 15-minute period within the hour analyzed. The average control delay includes initial deceleration delay, queue move-up time, and final acceleration time in addition to the stop delay. The LOS for unsignalized intersections is determined by the computed or measured control delay and is defined for each minor movement. The criteria for the various LOS designations for signalized and unsignalized intersections are given in Table 5.2-2.

LOS	Signalized (Control Delay) (sec/veh) ^a	Unsignalized (Control Delay) (sec/veh) ^b	Description
A	≤10.0	≤10.0	Operations with very low delay and most vehicles do not stop.
B	>10.0 and ≤20.0	>10.0 and ≤15.0	Operations with good progression but with some restricted movement.
C	>20.0 and ≤35.0	>15.0 and ≤25.0	Operations where a significant number of vehicles are stopping with some backup and light congestion
D	>35.0 and ≤55.0	>25.0 and ≤35.0	Operations where congestion is noticeable, longer delays occur, and many vehicles stop. The proportion of vehicles not stopping declines.
E	>55.0 and ≤80.0	>35.0 and ≤50.0	Operations where there is significant delay, extensive queuing, and poor progression.
F	>80.0	>50.0	Operations that are unacceptable to most drivers, when the arrival rates exceed the capacity of the intersection.

sec/veh = seconds per vehicle

Sources:

^a2000 Highway Capacity Manual, Chapter 16, Page 2, Exhibit 16-2

^b2000 Highway Capacity Manual, Chapter 17, Page 2, Exhibit 17-2

Within the City of San Diego, all signalized and unsignalized intersections are considered deficient if they operate at LOS E or F. All proposed CPU study area intersections currently operate at LOS D or better during both peak periods, except for the following intersections that operate at LOS E.

- Pacific Highway & Taylor Street (LOS E – AM peak)
- Lowell Street/Nimitz Boulevard & Rosecrans Street (LOS E – PM peak)

5.2.1.4 Freeway Segments

Table 5.2-3 identifies Caltrans criteria used to rate freeway segment operations based on an LOS scale from A to F.

LOS	v/c ratio	Congestion/Delay	Traffic Description
A	<0.41	None	Free flow
B	0.41 – 0.62	None	Free to stable flow, light to moderate volumes
C	0.63 – 0.79	None to minimal	Stable flow, moderate volumes, freedom to maneuver noticeably restricted
D	0.80 – 0.92	Minimal to substantial	Approaches unstable flow, heavy volumes, and very limited freedom to maneuver
E	0.93 – 1.00	Significant	Extremely unstable flow, maneuverability and psychological comfort extremely poor
F ₀	1.01 – 1.25	Considerable 0-1 hour delay	Operations that are unacceptable to most drivers, when the arrival rates exceed the capacity of the intersection
F ₁	1.26 – 1.35	Severe 1-2 hour delay	Forced flow, heavy congestion, long queues form behind breakdown points, stop and go
F ₂	1.36 – 1.45	Very severe 2-3 hour delay	Extremely heavy congestion, very long queues
F ₃	>1.46	Extremely severe 3+ hour delay	Gridlock

Source: SANTEC/ITE Guidelines for Traffic Impact Study in the San Diego Region

Freeway volumes were obtained from Caltrans. As shown in the table, the following freeway segments surrounding the proposed CPU area have volumes that exceed the capacity during the PM peak hour:

- I-5 Northbound (NB), between Sea World Drive and I-8 (LOS E – PM peak)
- I-5 Southbound (SB), between I-8 and Old Town Avenue (LOS E – PM peak)
- I-5 NB, between Old Town Avenue and Washington Street (LOS E – PM peak)

5.2.1.5 Freeway Ramp Metering

Ramp volumes were obtained from intersection turning movements data when applicable, or from Caltrans volumes. Table 5.2-4 displays the queuing analysis results for the ramps in the study area that are currently metered. The table compares the peak hour demand at the on-ramp with the current meter rate. As shown in the table, the following ramp meters within the proposed CPU area experience delays in excess of 15 minutes.

- I-8 EB/Sports Arena Boulevard (PM peak) – 51.8-minute delay
- I-5 SB/Sea World Drive (PM peak) – 39.6-minute delay

**Table 5.2-4
Existing Freeway Ramp Metering**

Ramp	Peak Period	Meter Rate ¹ (Veh/Hr)	Demand ² (Veh/Hr)	Excess Demand (Veh/Hr)	Average Delay (Min)
I-8 EB/Sports Arena Boulevard	AM	<i>Ramp not metered in the AM peak</i>			
	PM	490	913	423	51.8
I-5 SB/Sea World Drive	AM	318	375	57	10.8
	PM	318	528	210	39.6
I-5 NB/Sea World Drive	AM	1,118	1,261	143	7.7
	PM	1,320	1,170	0	0.0
I-5 SB/Old Town Avenue	AM	<i>Ramp not metered in the AM peak</i>			
	PM	352	360	8	1.4
I-5 NB/Old Town Avenue	AM	670	466	0	0.0
	PM	636	631	0	0.0

Source: TIS (Chen Ryan Associates 2017; Appendix B)

1) Meter rate is the assumed peak hour capacity expected to be processed through the ramp meter (using Caltrans fast rate)

2) Demand is the peak hour demand using the on-ramp

5.2.1.6 Alternative Transportation Facilities

a. Transit

The proposed CPU area is served by the Old Town Transit Center, which is a connection and transfer location for numerous bus routes, the Trolley Green Line, a commuter rail service (Coaster), and a regional rail line (Amtrak Surfliner). Three bus routes run through the Old Town community. Route 44 and Route 105 run along Taylor Street out of the community along Morena Boulevard and Route 88 runs along Taylor Street to Fashion Valley Mall along Hotel Circle Drive. There are existing bus stops located at the Old Town Transit Center, along Taylor Street at the intersection of Juan Street and Presidio Drive, and adjacent to I-8 near Presidio Park.

The LRT (MTS Trolley) station located at the Old Town Transit Center connects the Old Town community to Downtown, Mission Valley, San Diego State University, El Cajon, Santee, National City, Chula Vista, and San Ysidro. Freight trains, Amtrak, Coaster, and LRT can generate high, relatively brief, intermittent noise events within the vicinity of at-grade rail crossings where horns and bells are sounded. Rail noise is further discussed in Section 5.5 of this PEIR.

b. Bicycle Facilities

A key focus of The San Diego Regional Bike Plan prepared by SANDAG is to develop an interconnected network of bicycle corridors to improve the connectivity and quality of bicycle facilities and their supporting facilities. Similarly, the City of San Diego Bicycle Master Plan establishes guidance on achieving an ideal bicycle environment throughout the City and refines the Regional Bike Plan to include community-wide bicycle facilities. Together, these facilities promote intra-community and inter-community bicycle trips to strengthen connections within the planning area and between adjacent communities. In the Old Town community, the San Diego Regional Bike Plan identifies Congress Street to San Diego Avenue as a regional connection, and the City of San Diego Bicycle Master Plan recommends additional facilities on the local street network. The proposed CPU recommends a variety of bicycle facilities including bicycle paths (Class I), bicycle lanes (Class II), bicycle routes (Class III), and cycle tracks (Class IV).

Old Town's proximity to the San Diego River and the Old Town Transit Center makes bicycling an attractive mode of transportation for the community. Old Town's historic and cultural attractions also provide opportunities for bicycle connections to be established within the community. However, the street network is composed of narrow streets, many with vehicle parking on both sides of the street, which limits the potential to install marked bicycle lanes.

The existing and planned bicycle facility network for the Old Town Community Plan area is shown in Figure 5.2-1. Class I (Bicycle Path) facilities are currently provided along the south side of the San Diego River. Class II (Bicycle Lane) facilities are currently provided along Pacific Highway, Taylor Street (near Presidio Park from Presidio Drive to I-8 EB Ramps), and San Diego Avenue south of Hortensia Street. Class III (Bicycle Route) facilities are currently provided along Congress Street from Taylor Street to Ampudia Street (and the intersection of San Diego Avenue), along San Diego Avenue from Ampudia Street to south of Hortensia Street and along Presidio Drive from Taylor Street to Cosoy Way. There is a connection to the Uptown community from San Diego Avenue (Class III) and to the Midway-Pacific Highway community from Pacific Highway (Class II) and to the Mission Valley community from Taylor Street (Class II). The Class I facility along the San Diego River connects the community to Mission Valley and Ocean Beach.

Recommended bicycle facilities include future cycle track (Class IV) along Pacific Highway; Class II bike lanes along Taylor Street, Morena Boulevard, and Old Town Avenue; and a Class III bike route along Juan Street.

c. Pedestrian Facilities

Old Town is a community with a mix of land uses and historic and cultural attractions on an interconnected grid street network with small blocks, which correlates to an attractive atmosphere for pedestrians. The established street network allows for frequent intersections, easy connections, and short walking distances between the community's destinations. The community's narrow streets that help define the urban form and public realm of the community and the Old Town Transit Center support pedestrian activity for visitors, residents, and employees. However, connections that lead outside of the community are limited due to I-8 and I-5, which bound the community to the north and west, respectively.

Currently, pedestrians accessing the Old Town Community or the Old Town Transit Center from Pacific Highway or Rosecrans Street have to cross the shared BNSF and MTS Trolley rail right-of-way. The Taylor Street at-grade rail crossing is over 100 feet wide, gate to gate, and pedestrians have to cross over four sets of rail tracks. During peak hours there are approximately 13 train crossing events lasting between 30 seconds and 3 minutes. During these times, pedestrians are forced to wait until the trains clear the crossings, causing excessive delays.

There is also limited signage at the Old Town Transit Center directing pedestrians who are unfamiliar with the area, such as tourists, to the many restaurants, shops, historical monuments and structures, and parks in the community. Currently, there is only a single map to direct patrons to the various community features.

There are currently no sidewalks on Taylor Street, east of Presidio Drive, and on the east side of San Diego Avenue, just north of Ampudia Street. In addition, the retail and restaurant establishments along San Diego Avenue attract significant pedestrian traffic, particularly during evenings and weekends. The



Figure 5.2-1
Existing and Planned Bicycle Facilities

sidewalks along San Diego Avenue are currently 7 to 8 feet wide, with a limited parkway featuring street trees and planters. During peak times, typical weekend evenings, pedestrian traffic along San Diego Avenue exceeds sidewalk capacity creating a congested pedestrian environment.

There is currently no direct, convenient, or identifiable path connecting the Old Town Transit Center, Old Town San Diego State Historic Park, and Presidio Park. Both parks are major community features attracting tourists and out of town guests who may not be familiar with the community or its amenities.

There is currently a five legged intersection in which three of the approaches are stop-controlled (SB San Diego Avenue and EB & WB Ampudia Street) and the other two (NB San Diego Avenue and SB Congress Street) are free movements. There are also high vehicular traffic volumes crossing through the intersection along San Diego Avenue and Congress Street, which have no crosswalk facilities. The intersection is confusing and intimidating for pedestrians to cross due to the lack of traffic controls, high traffic volumes, and missing crosswalk facilities.

5.2.2 Significance Determination Thresholds

Thresholds used to evaluate potential impacts related to Transportation and Traffic are based on applicable criteria in the CEQA Guidelines Appendix G and the City of San Diego CEQA Significance Determination Thresholds (2016). Thresholds are modified from the City's CEQA Significance Determination Thresholds to reflect the programmatic analysis for the project. A significant impact could occur if implementation of a project would:

- 1) Result in an increase in projected traffic, which is substantial in relation to the existing traffic load and capacity of the street system including roadway segments, intersections, freeway segments, interchanges, or freeway ramps; or
- 2) Conflict with adopted policies, plans, or programs supporting alternative transportation.

The City of San Diego and Caltrans have developed acceptable threshold standards to determine the significance of project impacts to roadway segments, intersections, freeway segments, and freeway ramp metering. Along roadway segments and freeway segments, the measurement of effectiveness (MOE) is based on allowable increases in the volume-to-capacity (v/c) ratio. At intersections, the MOE is based on allowable increases in delay. At a freeway ramp meter, the MOE is based on allowable increases in delay, measured in minutes. These thresholds, applicable to the analysis of transportation facilities (Issue 1) are summarized in Table 5.2-5 and further detailed below.

Facility	Measures of Effectiveness (MOE)	Significance Threshold ¹
Roadway Segment	ADT, v/c ratio	> 0.02 at LOS E or > 0.01 at LOS F
Intersection	Seconds of Delay	> 2.0 seconds at LOS E or > 1.0 second at LOS F
Freeway Segment	v/c ratio	> 0.01 at LOS E or > 0.005 at LOS F
Freeway Ramp Meter	Minutes of delay per vehicle	>2.0 minutes for freeway segments operating at LOS E, and >1.0 minutes for freeway segments operating at LOS F. The criteria only apply for ramp meters where the delay without project is 15 minutes or higher.

ADT = average daily traffic; v/c = volume to capacity ratio

LOS = Level of Service

¹ Applies only when the facilities operates at LOS E or F

Source: City of San Diego Significance Determination Thresholds 2016; City of San Diego Planning Department 2007; TIS (Chen Ryan Associates 2017; Appendix B)

a. Roadway Segments

For roadway segments 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 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.

Where the roadway segment operates at LOS E or F, if the intersections at the ends of the segment are calculated to operate at an acceptable LOS with the project, and a peak hour Highway Capacity Manual (HCM) arterial analysis for the same segment shows that the segment operates at an acceptable LOS with the project, then the project impacts would be less than significant. If analysis shows either the intersections or segment under the peak hour HCM analysis do not operate acceptably, the project impacts would be significant.

In certain instances, mitigation may not be required even if a roadway segment operates at LOS E or LOS F. In such cases the following three conditions must all be met:

1. The roadway is built to its ultimate classification per the adopted Community Plan;
2. The intersections on both ends of the failing segment operate at an acceptable LOS; and
3. An HCM arterial analysis indicates an acceptable LOS on the segment.

b. Signalized and Unsignalized Intersections

LOS F is not acceptable for any approach leg except for side streets on an interconnected arterial system. If vehicle trips from a project cause an intersection approach leg to operate at LOS F, except in the cases of side streets on an interconnected arterial system, this would be considered a significant impact. At intersections that are expected to operate at LOS E or F without the proposed CPU, the allowable increase in delay is 2 seconds at LOS E and 1 second at LOS F with the addition of the proposed CPU. If vehicle trips from a project cause the delay at an intersection to increase by more than

the allowable threshold, this would be considered a significant impact. Also, if the proposed CPU causes an intersection that was operating at an acceptable LOS to operate at LOS E or F, this would be considered a significant impact.

c. Freeway Segments

For freeway segments forecasted to operate at LOS E or F with the project, the allowable increase in v/c ratio is 0.01 at LOS E and 0.005 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 impact. Also, if the project causes a freeway segment that was operating at an acceptable LOS to operate at LOS E or F, this would be considered a significant impact.

d. Freeway Ramp Metering

Ramp metering is a means of controlling the volume of traffic entering the freeway with the goal of improving the traffic operations and flow on the freeway main lanes. Freeway ramp meter analysis estimates the peak hour queues and delays at freeway ramps by comparing existing volumes to the meter rate at the given location. The excess demand, if any, forms the basis for calculating the maximum queues and maximum delays anticipated at each location. Substantial queues and delays can form where demand significantly exceeds the meter rate. This approach assumes a static meter rate throughout the course of the peak hour. However, Caltrans has indicated that the meter rates are continually adjusted based on the level of traffic using the on-ramp. To the extent possible, the meter rate is set such that the queue length does not exceed the available storage, smooth flow on the freeway mainline is maintained, and there is no interference to arterial traffic.

If vehicle trips from a CPU cause a metered ramp with a delay of 15 minutes per vehicle or higher to increase its delay by more than 2 minutes per vehicle, this would be considered a significant impact if the freeway segment operates at LOS E or F.

5.2.3 Impact Analysis

Issue 1 Traffic Circulation

Would the project result in an increase in projected traffic, which is substantial in relation to the existing traffic load and capacity of the street system including roadway segments, intersections, freeway segments, interchanges, or freeway ramps?

To assess potential impacts, this section provides a description of Future (Year 2035) community conditions for the proposed CPU area. Due to the nature of the project being an update to the adopted Community Plan with no specific development project being proposed at this time, the analysis provided in this section is cumulative in nature. The analysis considers the existing conditions within the proposed CPU area and evaluates impacts to applicable facilities within the proposed CPU area through future conditions (2035). The future community conditions were developed based on the proposed CPU, and land use and network assumptions within the proposed CPU area superimposed on the SANDAG 2035 Series 12 Traffic Forecast Model, which uses regional growth forecasts.

Since the Old Town community and Midway-Pacific Highway community are located adjacent to each other and are undergoing updates to their community plans concurrently, projected traffic volume increases associated with development in the proposed Midway-Pacific Highway CPU are included within the analysis.

a. Future Traffic Volumes

The peak-hour intersection turning movements and roadway segment traffic data for the existing condition were obtained from several sources as detailed in the TIS. It should be noted that the existing conditions report was completed in November 2012; therefore, the traffic counts conducted to evaluate existing conditions were collected in year 2012 as well. To ensure the counts used to evaluate existing conditions are still relevant to current conditions, a sampling of the 2012 counts was validated with recently conducted counts (collected in 2015 and 2016). Through the validation process limited growth was observed in the traffic volumes between year 2012 and year 2015/2016 conditions. Therefore, the counts used to evaluate existing conditions would still be considered valid and provide a good representation of volumes for existing conditions for a planning level study.

The resulting roadway network for the project area under Future conditions under the project are shown in Figure 3-3 in Chapter 3, Project Description. The daily traffic volumes are shown in Table 5.2-6.

b. Roadway Segment Analysis

Table 5.2-6 displays the LOS analysis results for roadway segments within the Old Town community using existing roadway classifications and the future peak-hour traffic volumes based on future conditions for the proposed CPU area, including proposed roadway segment modifications and new roadways. As shown in Table 5.2-6, the project would have a cumulative impact on seven of the 20 roadway segments within the study area. Although the future volumes along the segment of Taylor Street from Morena Boulevard to I-8 Eastbound Ramps would exceed the theoretical capacity of the roadway, the intersections at both ends of the roadway segment and the peak hour HCM arterial analysis indicate an acceptable LOS and provide a more accurate indication of the facility's LOS. Therefore, this roadway segment is not considered to have traffic related impacts.

- Impact 5.2-1:** Congress Street from Taylor Street to Twiggs Street.
- Impact 5.2-2:** San Diego Avenue from Ampudia Street to Old Town Avenue.
- Impact 5.2-3:** San Diego Avenue from Old Town Avenue to Hortensia Street.
- Impact 5.2-4:** Juan Street from Taylor Street to Twiggs Street.
- Impact 5.2-5:** Juan Street from Twiggs Street to Harney Street.
- Impact 5.2-6:** Old Town Avenue from Hancock Street to Moore Street.
- Impact 5.2-7:** Old Town Avenue from Moore Street to San Diego Avenue.

Table 5.2-6 Summary of Roadway Segment Analysis									
Roadway Segment	Existing			2035 Future			Δ in ADT	Δ in V/C	Significant Impact?
	ADT	V/C Ratio (a)	LOS	ADT	V/C Ratio (a)	LOS			
Congress Street									
Taylor Street to Twiggs Street	4,230	0.53	C	7,700	0.96	E	3,470	0.43	YES
Twiggs Street to Harney Street	4,380	0.55	C	6,300	0.79	D	1,920	0.24	NO
Harney Street to San Diego Avenue/Ampudia Street	4,280	0.54	C	6,200	0.78	D	1,920	0.24	NO
San Diego Avenue									
Twiggs Street to Harney Street	3,540	0.44	C	4,900	0.61	C	1,360	0.17	NO
Conde Street to Arista Avenue	4,350	0.54	C	4,500	0.56	C	150	0.02	NO
Ampudia Street to Old Town Avenue	10,160	1.27	F	12,100	1.51	F	1,940	0.24	YES
Old Town Avenue to Hortensia Street	5,400	0.68	D	6,700	0.84	E	1,300	0.16	YES
Juan Street									
Taylor Street to Twiggs Street	5,430	0.68	D	7,000	0.88	E	1,570	0.20	YES
Twiggs Street to Harney Street	4,810	0.60	C	6,600	0.83	E	1,790	0.23	YES
Harney Street to San Juan Road	2,930	0.37	B	3,700	0.46	C	770	0.09	NO
Taylor Street									
Pacific Highway/Rosecrans Street to Congress Street	22,100	0.55	C	30,500	0.76	D	8,400	0.21	NO
Congress Street to Juan Street	13,560	0.30	A	21,300	0.47	B	7,740	0.17	NO
Juan Street to Morena Boulevard	17,350	0.44	B	25,700	0.64	C	8,350	0.20	NO
Morena Boulevard to I-8 EB Ramps	13,140	1.64	F	15,300	1.91	F	2,160	0.27	NO (b)
Twiggs Street									
Congress Street to San Diego Avenue	2,080	0.26	A	2,600	0.33	B	520	0.07	NO
San Diego Avenue to Juan Street	2,670	0.33	B	3,600	0.45	C	930	0.12	NO
Harney Street									
Congress Street to San Diego Avenue	1,520	0.19	A	1,800	0.23	A	280	0.04	NO
San Diego Avenue to Juan Street	2,350	0.29	A	3,400	0.43	B	1,050	0.14	NO
Old Town Avenue									
Hancock Street to Moore Street	11,750	1.47	F	12,200	1.53	F	450	0.06	YES
Moore Street to San Diego Avenue	6,120	0.77	D	6,500	0.81	E	380	0.04	YES
Pacific Highway									
Sea World Drive to Taylor Street	7,460	0.50	C	10,600	0.71	D	3,140	0.21	NO
Morena Boulevard									
I-5 Ramps and Taylor Street	7,585	0.25	A	21,900	0.73	C	14,315	0.48	NO

Bold values indicate roadway segments operating at LOS E or F.

Capacity for non-standard roadway classifications were provided by City of San Diego staff.

(a) The v/c ratio is calculated by dividing the ADT volume by each respective roadway segment's capacity.

(b) Although the future volumes along the segment of Taylor Street from Morena Boulevard to I-8 Eastbound Ramps would exceed the theoretical capacity of the roadway, the intersections at both ends of the roadway segment and the peak hour HCM arterial analysis indicate an acceptable LOS and provide a more accurate indication of the facility's LOS. Therefore, this roadway segment is not considered to have traffic related impacts. See Appendix B (TIS Addendum) for further details.

c. Intersection Analysis

Table 5.2-7 displays the LOS analysis results for the study intersections using existing lane configurations and the future peak-hour traffic volumes based on the intersection improvements and new intersections identified in the proposed CPU. As shown in Table 5.2-7 and summarized below, the project would have a cumulative impact at one of the 20 study intersections. Study intersections include intersections that are located outside of the Old Town community as identified within the TIS.

Impact 5.2-8: Moore Street & Old Town Avenue in the PM peak hour.

d. Freeway Segments

Table 5.2-8 displays the LOS analysis results for the freeway segments using their existing freeway configuration and the future peak-hour traffic volumes. As shown, the traffic generated by the land use changes associated with the project would have a cumulative impact along seven freeway segments within the study area.

The following significant cumulative freeway segment impacts are identified:

Impact 5.2-9: I-5 NB (AM & PM peak hour) & SB (PM peak hour) from Clairemont Drive to Sea World Drive.

Impact 5.2-10: I-5 NB from Sea World Drive to I-8 (AM & PM peak hour).

Impact 5.2-11: I-5 NB from Old Town Avenue to Washington Street (AM & PM peak hour).

Impact 5.2-12: I-8 EB from Morena Boulevard to Hotel Circle Drive (PM peak hour).

Impact 5.2-13: I-5 SB from I-8 to Old Town Avenue (PM peak hour).

Impact 5.2-14: I-5 SB from Washington Street to Pacific Highway (PM peak hour).

Impact 5.2-15: I-5 SB from Laurel Street to Hawthorne Street (PM peak hour).

Table 5.2-7 Summary of Intersection Analysis									
Intersection	Traffic Control	Peak Hour	Existing		2035 Projections		Δ in Delay	Significant Impact?	
			DELAY (A)	LOS (B)	DELAY (A)	LOS (B)			
1	Pacific Highway & Taylor Street	Signal	AM	64.6	E	31.1	C	-33.5	NO
			PM	33.5	C	51.2	D	17.7	NO
2	Moore Street & Old Town Avenue	Signal	AM	16.4	B	23.2	C	6.8	NO
			PM	16.4	B	96.5	F	80.1	YES
3	Congress Street and Taylor Street	Signal	AM	19.9	B	13.8	B	-6.1	NO
			PM	21.7	C	19.2	B	-2.5	NO
4	Congress Street & Twiggs Street	AWSC ¹	AM	8.1	A	9.7	A	1.6	NO
			PM	8.6	A	10.8	B	2.2	NO
5	Congress Street & Harney Street	AWSC ¹	AM	8.1	A	9.1	A	1.0	NO
			PM	8.3	A	9.4	A	1.1	NO
6	Congress Street & San Diego Avenue/Ampudia Street	AWSC ¹	AM	12.3	B	10.4	C	-1.9	NO
			PM	11.5	B	11.3	C	-0.2	NO
7	San Diego Avenue & Twiggs Street	AWSC ¹	AM	7.9	A	8.0	A	0.1	NO
			PM	8.0	A	8.1	A	0.1	NO
8	San Diego Avenue & Harney Street	AWSC ¹	AM	8.2	A	9.0	A	0.8	NO
			PM	8.2	A	10.8	B	2.6	NO
9	San Diego Avenue & Old Town Avenue	Signal	AM	18.4	B	17.4	B	-1.0	NO
			PM	11.6	B	13.7	B	2.1	NO
10	Juan Street & Taylor Street	Signal	AM	10.4	B	14.6	B	4.2	NO
			PM	10.7	B	18.6	B	7.9	NO
11	Juan Street & Twiggs Street	AWSC ¹	AM	8.8	A	9.7	A	0.9	NO
			PM	8.5	A	10.1	B	1.6	NO
12	Juan Street & Harney Street	AWSC ¹	AM	8.3	A	9.0	A	0.7	NO
			PM	7.9	A	8.9	A	1.0	NO
13	Morena Boulevard & Taylor Street	Signal	AM	22.4	C	21.9	C	-0.5	NO
			PM	16.4	B	24.8	C	8.4	NO
14	I-8 EB Ramps & Taylor Street	Signal	AM	24.0	C	31.5	C	7.5	NO
			PM	35.9	D	40.1	D	4.2	NO
15	Taylor Street / Hotel Circle South & Hotel Circle North	AWSC ¹	AM	9.2	A	10.3	B	1.1	NO
			PM	16.5	C	31.0	D	14.5	NO
16	I-8 WB Ramps & Hotel Circle North	Signal	AM	22.8	C	46.6	D	23.8	NO
			PM	15.9	B	18.7	B	2.8	NO

Table 5.2-7 Summary of Intersection Analysis									
Intersection		Traffic Control	Peak Hour	Existing		2035 Projections		Δ in Delay	Significant Impact?
				DELAY (A)	LOS (B)	DELAY (A)	LOS (B)		
Intersections Outside of Study Community									
17	Hancock Street & Old Town Avenue	AWSC ¹	AM	16.9	C	24.8	C	7.9	NO
			PM	14.6	B	20.9	C	6.3	NO
18	Pacific Highway & Sea World Drive	Signal	AM	19.9	B	24.0	C	4.1	NO
			PM	25.6	C	34.1	C	8.5	NO
19	I-5 SB Ramps & Sea World Drive	Signal	AM	15.5	B	17.8	B	2.3	NO
			PM	16.3	B	20.0	C	3.7	NO
20	I-5 NB Ramps & Sea World Drive	Signal	AM	21.4	C	29.3	C	7.9	NO
			PM	28.4	C	43.3	D	14.9	NO

Bold values indicate intersections operating at LOS E or F.

(A) Delay refers to the average control delay for the entire intersection, measured in seconds per vehicle. At a one-way or two-way stop-controlled intersection, delay refers to the worst movement.

(B) LOS calculations are based on the methodology outlined in the 2000 Highway Capacity Manual and performed using Synchro 9.0.

¹ All Way Stop Controlled

Table 5.2-8 Summary of Freeway Segment Level of Service									
Freeway Segment	Direction	Number of Lanes	Capacity ¹	Existing		2035 Projections		Δ ³	Significant Impact?
				V/C Ratio ²	LOS	V/C Ratio	LOS		
AM PEAK									
I-8									
Beginning of Freeway to Sports Arena Boulevard	EB	2M+0A	4,700	0.40	A	0.55	B	0.15	NO
	WB			0.28	A	0.36	A	0.08	NO
Sports Arena Boulevard to I-5	EB	3M+1A	8,450	0.52	B	0.64	C	0.12	NO
	WB			0.34	A	0.41	B	0.07	NO
I-5 to Morena Boulevard	EB	4M+1A	10,800	0.36	A	0.51	B	0.15	NO
	WB	5M+0A	11,750	0.47	B	0.66	C	0.19	NO
Morena Boulevard to Hotel Circle Drive	EB	4M+1A	10,800	0.60	B	0.70	C	0.10	NO
	WB	5M+0A	11,750	0.63	C	0.71	C	0.08	NO
I-5									
Clairemont Drive to Sea World Drive	NB	5M+0A	11,750	0.85	D	0.94	E	0.09	YES
	SB			0.53	B	0.59	B	0.06	NO
Sea World Drive to I-8	NB	4M+1A	10,800	0.83	D	0.97	E	0.17	YES
	SB	4M+2A	12,200	0.44	B	0.52	B	0.08	NO
I-8 to Old Town Avenue	NB	4M+1A	10,800	0.71	C	0.87	D	0.16	NO
	SB	5M+0A	11,750	0.67	C	0.83	D	0.16	NO
Old Town Avenue to Washington Street	NB	4M+0A	9,400	0.80	D	0.94	E	0.14	YES
	SB	5M+0A	11,750	0.66	C	0.79	D	0.13	NO
Washington Street to Pacific Highway	NB	4M+0A	9,400	0.64	C	0.76	C	0.12	NO
	SB			0.55	B	0.68	C	0.13	NO
Pacific Highway to Laurel Street	NB	4M+1A	10,800	0.61	B	0.89	D	0.28	NO
	SB			0.44	B	0.67	C	0.23	NO
Laurel Street to Hawthorn Street	NB	4M+1A	10,800	0.75	C	0.92	D	0.17	NO
	SB			0.56	B	0.70	C	0.14	NO
PM PEAK									
I-8									
Beginning of Freeway to Sports Arena Boulevard	EB	2M+0A	4,700	0.68	C	0.66	C	-0.02	NO
	WB			0.28	A	0.60	B	0.32	NO
Sports Arena Boulevard to I-5	EB	3M+1A	8,450	0.66	C	0.65	C	-0.01	NO
	WB			0.40	A	0.64	C	0.24	NO
I-5 to Morena Boulevard	EB	4M+1A	10,800	0.51	B	0.61	B	0.10	NO
	WB	5M+0A	11,750	0.44	B	0.71	C	0.27	NO
Morena Boulevard to Hotel Circle Drive	EB	4M+1A	10,800	0.90	D	1.02	F	0.12	YES
	WB	5M+0A	11,750	0.68	C	0.77	C	0.09	NO

Table 5.2-8 Summary of Freeway Segment Level of Service									
Freeway Segment	Direction	Number of Lanes	Capacity ¹	Existing		2035 Projections		Δ ³	Significant Impact?
				V/C Ratio ²	LOS	V/C Ratio	LOS		
I-5									
Clairemont Drive to Sea World Drive	NB	5M+0A	11,750	0.91	D	1.00	E	0.09	YES
	SB			0.88	D	0.96	E	0.08	YES
Sea World Drive to I-8	NB	4M+1A	10,800	0.93	E	1.07	F	0.14	YES
	SB	4M+2A	12,200	0.75	C	0.88	D	0.13	NO
I-8 to Old Town Avenue	NB	4M+1A	10,800	0.68	C	0.82	D	0.14	NO
	SB	5M+0A	11,750	0.97	E	1.18	F	0.21	YES
Old Town Avenue to Washington Street	NB	4M+0A	9,400	0.96	E	1.14	F	0.18	YES
	SB	5M+0A	11,750	0.73	C	0.87	D	0.14	NO
Washington Street to Pacific Highway	NB	4M+0A	9,400	0.51	B	0.61	B	0.10	NO
	SB			0.89	D	1.09	F	0.20	YES
Pacific Highway to Laurel Street	NB	4M+1A	10,800	0.54	B	0.78	C	0.24	NO
	SB			0.56	B	0.86	D	0.30	NO
Laurel Street to Hawthorn Street	NB	4M+1A	10,800	0.66	C	0.77	C	0.11	NO
	SB			0.76	C	0.96	E	0.20	YES

Notes:

Bold values indicate freeway segments operating at LOS E or F.

For descriptions of LOS ratings for freeway segments, refer to Table 5.2-3.

¹The capacity is calculated as 2,000 ADT per lane and 1,200 ADT per auxiliary lane

² V/C Ratio is the volume to capacity ratio

³ Δ = change in v/c ratio between existing and 2035 projections

e. Ramp Meters

Table 5.2-9 displays the analysis results for the ramp meters using their existing configuration and meter rate and the future peak-hour traffic volumes. As shown, the traffic generated by the land use changes associated with the project would have a cumulative impact at one ramp meter within the study area as follows:

Impact 5.2-16: I-5 SB/Sea World Drive Ramp in the PM peak hour.

Table 5.2-9 Peak Hour Ramp Metering Analysis – Horizon Year Conditions											
On-Ramp	Peak Period	Meter Rate ¹ (veh/hr)	Existing Demand ² (veh/hr)	Excess Existing Demand (veh/hr)	Average Existing Delay (min)	Preferred Plan Future Conditions Projected Demand ² (veh/hr)	Excess Preferred Plan Future Conditions Projected Demand (veh/hr)	Average Preferred Plan Future Conditions Projected Delay (min)	D in Delay within Project (min)	Significant Impact?	Average with Project Queue
Sports Arena Boulevard to I-8 EB	Ramp not metered in the AM peak								0.0	NO	0 ft
	PM	641	913	272	25.5	920	279	26.1	0.6	NO	8,091 ft
Sea World Drive to I-5 SB	AM	444	375	0	0.0	530	86	11.6	11.6	NO	2,494 ft
	PM	444	528	84	11.4	670	226	30.5	19.1	YES	6,554 ft
Sea World Drive to I-5 NB	AM	1,555	1,261	0	0.0	1,530	0	0.0	0.0	NO	0 ft
	PM	1,656	1,170	0	0.0	1,250	0	0.0	0.0	NO	0 ft
Old Town Avenue to I-5 SB	Ramp not metered in the AM peak								0.0	NO	0 ft
	PM	461	360	0	0.0	410	0	0.0	0.0	NO	0 ft
Old Town Avenue to I-5 NB	AM	905	466	0	0.0	370	0	0.0	0.0	NO	0 ft
	PM	888	631	0	0.0	690	0	0.0	0.0	NO	0 ft

ft = feet; min = minutes; veh/hr = vehicles per hour

¹ Meter rate is the assumed peak hour capacity expected to be processed through the ramp meter (using Caltrans fast rate)

² Demand is the peak hour demand using the on-ramp

Issue 2 Alternative Transportation

Would the project conflict with adopted policies, plans, or programs supporting alternative transportation?

a. Transit

Planned transit routes within the proposed CPU area identified in SANDAG's RP2015 Regional Plan and discussed in the Old Town and Midway-Pacific Highway Communities Mobility Study include Rapid Bus, LRT (Trolley), and transit facilities as shown in Figure 5.2-2. Definitions of each of these types of service are provided in Chapter 2.0 of this PEIR. The changes in existing transit operations to serve the Old Town community are described below.

- An **increase in local bus service** within key corridors to 10 minute headways is programmed and scheduled for Year 2035.
- The **Mid-Coast Trolley** will extend service from Santa Fe Depot in Downtown San Diego to the University City community, serving major activity centers such as Old Town, the University of California, San Diego (UCSD), and Westfield UTC. Construction of the Mid-Coast Trolley line is anticipated to be completed by the Year 2021.
- **Bus Route 10** will convert to Rapid Service along its current route and expand its coverage through the Midway-Pacific Highway community to Ocean Beach. Route 10 currently provides local bus service between University/College Avenue and Old Town, through the communities of City Heights, North Park, and Hillcrest. The expected year for completion of this improvement is 2035.
- **Bus Route 28** will convert to Rapid Service along its current route. Route 28 currently provides local bus service along Rosecrans Street between Point Loma and Kearny Mesa via the Old Town Transit Center. The expected year for completion of this improvement is 2035.
- A new **Rapid Bus Route 30** will be implemented to provide service between Old Town Transit Center and Sorrento Mesa via Pacific Beach, La Jolla, and UTC.
- A new **Rapid Bus Route 640A** will be implemented to provide service along I-5 between San Ysidro and the Old Town Transit Center via City College Downtown.
- The **San Diego International Airport Intermodal Transit Center (ITC)** will act as an important hub connecting all modes of transportation accessing and departing from Lindbergh Field. The ITC is planned to be located on the north end of the airport, just south of I-5 between Washington Street and Sassafras Street. The ITC is being planned as a major transit hub connecting all three existing trolley lines (blue, green, and orange), the Coaster, Amtrak, new MTS Express Bus routes directly serving the airport, several local MTS bus routes, and the planned California High Speed Rail system. The ITC also plans to include raised bicycle lanes and cycle tracks on the streets surrounding the ITC and wider sidewalks around the ITC and new retail uses. The ITC is anticipated to be constructed and operational by the Year 2035.



Source: City of San Diego



**Figure 5.2-2
Planned Transit Services**

The project would support implementation of the transit improvements identified in the RP2015 Regional Plan by providing policies that support prioritizing the transit system and improving efficiency of transit services. For example, a number of transit-focused Mobility Element policies are included in the proposed CPU that would support efforts to develop planned transit facilities and maintain and enhance existing transit facilities and connections. Thus, implementation of the proposed CPU would not interfere with planned transit improvements and would provide policy support for their implementation. Impacts related to conflicts with existing or planned transit facilities would be less than significant.

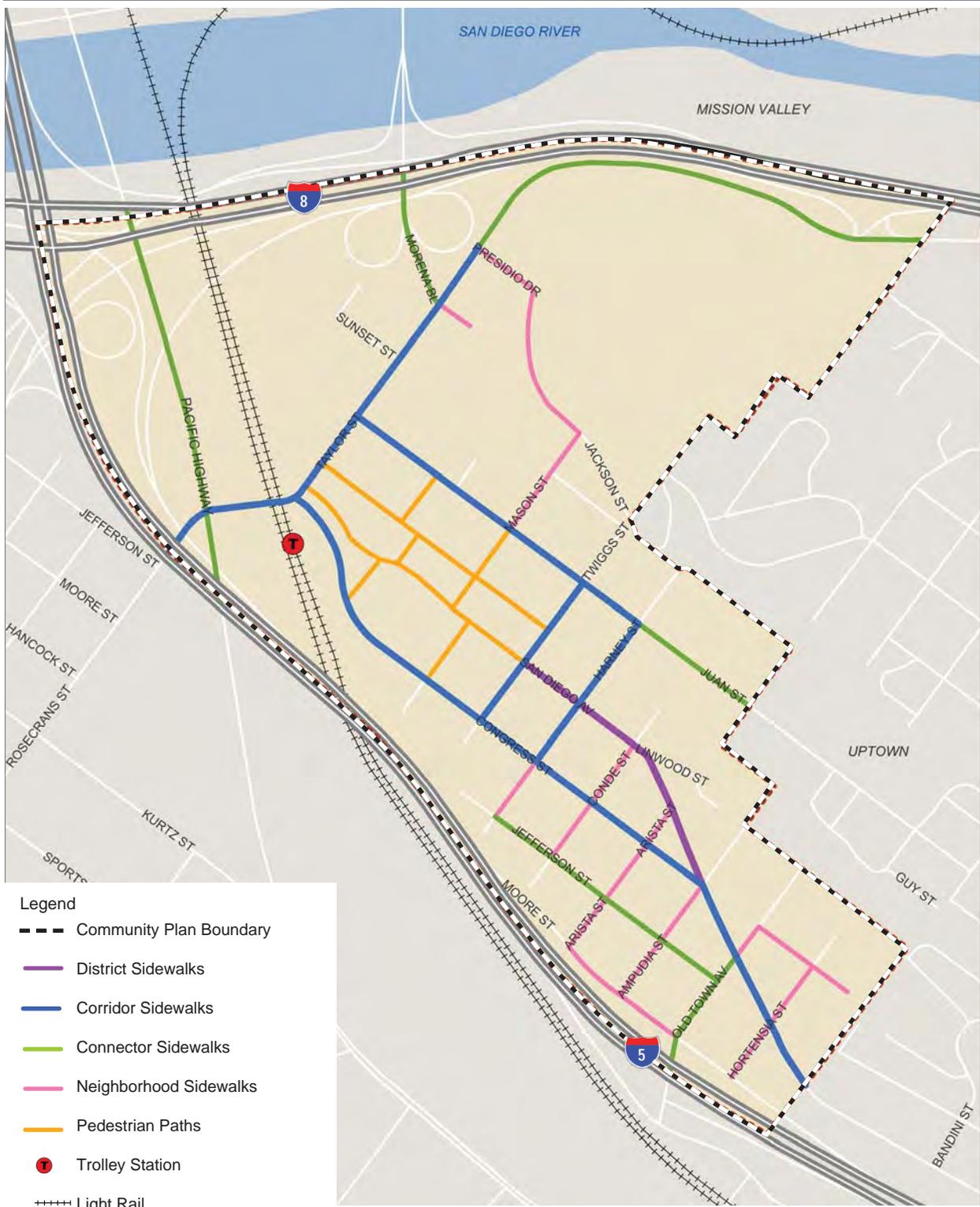
b. Bicycle Facilities

The project would support existing plans and policies relative to the bicycle network. The recommended bicycle facility network for the proposed CPU is shown in Figure 5.2-1. The Mobility Element includes several bicycle-focused policies that support providing bicycle connections between historic and cultural attractions, the Old Town Transit Center, the regional bicycle networks, and the San Diego River Park as well as implementing additional bicycle facilities where feasible. Policies in the proposed plan support coordination with SANDAG on the planning and implementation of regional bicycle facilities, and support increased bicycle comfort and safety, repurposing rights-of-way for bicycle facilities, and bike sharing. Thus, implementation of the project would not conflict with adopted policies, plans, or programs supporting bicycle facilities.

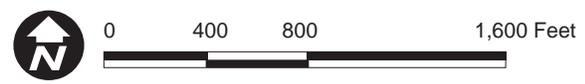
c. Pedestrian Facilities

The recommended pedestrian facility network for the proposed CPU is shown in Figure 5.2-3. There are no major scheduled or funded pedestrian facility improvement projects for the Old Town community. However, the proposed CPU Mobility Element includes a number of policies related to pedestrian amenities to complete gaps in the sidewalk network, provide non-contiguous sidewalks along Pacific Highway and Taylor Street, provide pedestrian-oriented lighting along San Diego Avenue, Congress Street, Taylor Street, Juan Street, Harney Street, Twiggs Street, and Pacific Highway, and improve pedestrian crossings at several locations within the community. Implementation of the project would not restrict or impede pedestrian connectivity and would not conflict with any adopted policies or plans addressing pedestrian facilities. Thus, impacts would be less than significant.

In addition, the community's adopted PFFP contains planned pedestrian improvements to install/upgrade 20 curb ramps to meet ADA standards. These improvements are not currently scheduled or funded, but are consistent with the proposed CPU.



Source: City of San Diego



**Figure 5.2-3
Planned Pedestrian Services**

5.2.4 Significance of Impacts

Cumulative impacts to roadway segments, intersections, freeway segments, and ramp meters were determined to be significant, as detailed below.

5.2.4.1 Traffic Circulation

a. Roadway Segments

- Congress Street: Taylor Street to Twiggs Street (**Impact 5.2-1**)
- San Diego Avenue: Ampudia Street to Old Town Avenue (**Impact 5.2-2**)
- San Diego Avenue: Old Town Avenue to Hortensia Street (**Impact 5.2-3**)
- Juan Street: Taylor Street to Twiggs Street (**Impact 5.2-4**)
- Juan Street: Twiggs Street to Harney Street (**Impact 5.2-5**)
- Old Town Avenue: Hancock Street to Moore Street (**Impact 5.2-6**)
- Old Town Avenue: Hancock Street to San Diego Avenue (**Impact 5.2-7**)

b. Intersections

- Moore Street & Old Town Avenue (PM peak hour) (**Impact 5.2-8**)

c. Freeway Segments

- I-5 NB (AM & PM peak hours) & SB (PM peak hour) from Clairemont Drive to Sea World Drive (**Impact 5.2-9**)
- I-5 NB from Sea World Drive to I-8 (AM & PM peak hours) (**Impact 5.2-10**)
- I-5 NB from Old Town Avenue to Washington Street (AM & PM peak hours) (**Impact 5.2-11**)
- I-8 EB from Morena Boulevard to Hotel Circle Drive (PM peak hour) (**Impact 5.2-12**)
- I-5 SB from I-8 to Old Town Avenue (PM peak hour) (**Impact 5.2-13**)
- I-5 SB from Washington Street to Pacific Highway (PM peak hour) (**Impact 5.2-14**)
- I-5 SB from Laurel Street to Hawthorne Street (PM peak hour) (**Impact 5.2-15**)

d. Ramp Meters

- I-5 SB/Sea World Drive (PM peak hour) (**Impact 5.2-16**)

5.2.4.2 Alternative Transportation

The project would be consistent with adopted policies, plans, or programs supporting alternative transportation. Additionally, the project (including the proposed IFS) would provide planned alternative transportation facilities and policies that support improvements to pedestrian, bicycle, and transit facilities. Thus, the project would have a less than significant impact related to conflicts with adopted policies, plans, or programs supporting alternative transportation, and no mitigation is required.

5.2.5 Mitigation Framework

The TIS identified improvements that would mitigate or reduce roadway segment and intersection impacts. However, all the identified improvements that would mitigate or reduce vehicular impacts were not recommended as part of the project to maintain consistency with the overall CPU mobility vision and other proposed CPU policies, which are consistent with the General Plan's City of Villages strategy.

While Mitigation Measures TRANS 5.2-1 through TRANS 5.2-7 would reduce potentially significant impacts to roadway segments if implemented, none of the measures are included within the proposed CPU or Old Town IFS since they would be inconsistent with the mobility goals of the proposed CPU because they would require road widening or other automobile-related improvements which would impede implementation of planned pedestrian and bicycle improvements and realization of the proposed CPU's goals regarding walkability and bicycling. The measures would also be inconsistent with the project objective to maintain and enhance the pre-1872 community character of Old Town through land use and urban design policies and development regulations.

~~While~~ Mitigation Measure TRANS 5.2-8 would reduce the potentially significant intersection impact if implemented. However, this measure is not included within the proposed CPU or Old Town IFS since it would be inconsistent with the mobility goals of the proposed CPU because it ~~could~~ would require road widening or other automobile-related improvements which would impede implementation of planned pedestrian and bicycle improvements and realization of the proposed CPU's goals regarding walkability and bicycling.

Mitigation Measures TRANS 5.2-9 through 5.2-16 are identified for impacts to freeways; however, because freeway improvements are not within the authority of the City, they are infeasible and not proposed as part of the proposed CPU. The improvements identified in SANDAG's Regional Plan would improve operations along the freeway segments and ramps; however, to what extent is still undetermined, as these are future improvements that must be defined more over time. The City will continue to coordinate with Caltrans and SANDAG on future improvements, as future project-level developments proceed, to develop potential "fair share" mitigation strategies for freeway impacts, as appropriate.

5.2.5.1 Roadway Segments

- TRANS 5.2-1:** Congress Street from Taylor Street to Twiggs Street (Impact 5.2-1): Widen the roadway to a 2-lane collector with center left-turn lane.
- TRANS 5.2-2:** San Diego Avenue from Ampudia Street to Old Town Avenue (Impact 5.2-2): Widen the roadway to a 2-lane collector with center left-turn lane.
- TRANS 5.2-3:** San Diego Avenue from Old Town Avenue to Hortensia Street (Impact 5.2-3): Widen the roadway to a 2-lane collector with center left-turn lane.
- TRANS 5.2-4:** Juan Street from Taylor Street to Twiggs Street (Impact 5.2-4): Widen the roadway to a 2-lane collector with center left-turn lane.

TRANS 5.2-5: Juan Street from Twiggs Street to Harney Street (Impact 5.2-5): Widen the roadway to a 2-lane collector with center left-turn lane.

TRANS 5.2-6: Old Town Avenue from Hancock Street to Moore Street (Impact 5.2-6): Widen the roadway to a 2-lane collector with center left-turn lane.

TRANS 5.2-7: Old Town Avenue from Moore Street to San Diego Avenue (Impact 5.2-7): Widen the roadway to a 2-lane collector with center left-turn lane.

5.2.5.2 Intersections

TRANS 5.2-8: Moore Street and Old Town Street (Impact 5.2-8): Implement exclusive eastbound and westbound left-turn lanes along Old Town Avenue and convert the eastbound/westbound signal phasing from permitted to protected phasing.

5.2.5.3 Freeway Segments

TRANS 5.2-9: I-5 northbound and southbound from Clairemont Drive to Sea World Drive (Impact 5.2-9): SANDAG's RP2015 Regional Plan identifies the construction of a managed lane along this segment to be completed by Year 2050. There is some uncertainty related to the actual improvements and associated traffic impacts that will materialize over time. Future development projects' transportation studies would be able to more accurately identify individual project-level impacts and provide the mechanism to mitigate them through fair share contributions in addition to the funding identified in the Revenue Constrained Network.

TRANS 5.2-10: I-5 northbound from Sea World Drive to I-8 (Impact 5.2-10): SANDAG's RP2015 Regional Plan identifies the construction of a managed lane along this segment to be completed by Year 2050. There is some uncertainty related to the actual improvements and associated traffic impacts that will materialize over time. Future development projects' transportation studies would be able to more accurately identify individual project-level impacts and provide the mechanism to mitigate them through fair share contributions in addition to the funding identified in the Revenue Constrained Network.

TRANS 5.2-11: I-5 northbound from Old Town Avenue to Washington Street (Impact 5.2-11): SANDAG's RP2015 Regional Plan identifies ~~the construction of a managed lane~~operational improvements along this segment to be completed by Year 2050. There is some uncertainty related to the actual improvements and associated traffic impacts that will materialize over time. Future development projects' transportation studies would be able to more accurately identify individual project-level impacts and provide the mechanism to mitigate them through fair share contributions in addition to the funding identified in the Revenue Constrained Network.

TRANS 5.2-12: I-8 eastbound from Morena Boulevard to Hotel Circle Drive (Impact 5.2-12): SANDAG's RP2015 Regional Plan identifies operational improvements along this segment to be completed by Year 2050. There is some uncertainty related to the actual improvements and associated traffic impacts that will materialize over time. Future development

projects' transportation studies would be able to more accurately identify individual project-level impacts and provide the mechanism to mitigate them through fair share contributions in addition to the funding identified in the Revenue Constrained Network.

TRANS 5.2-13: I-5 southbound from I-8 to Old Town Avenue (Impact 5.2-13): SANDAG's RP2015 Regional Plan identifies ~~the construction of a managed lane~~ operational improvements along this segment to be completed by Year 2050. There is some uncertainty related to the actual improvements and associated traffic impacts that will materialize over time. Future development projects' transportation studies would be able to more accurately identify individual project-level impacts and provide the mechanism to mitigate them through fair share contributions in addition to the funding identified in the Revenue Constrained Network.

TRANS 5.2-14: I-5 southbound from Washington Street to Pacific Highway (Impact 5.2-14): SANDAG's RP2015 Regional Plan identifies ~~the construction of a managed lane~~ operational improvements along this segment to be completed by Year 2050. There is some uncertainty related to the actual improvements and associated traffic impacts that will materialize over time. Future development projects' transportation studies would be able to more accurately identify individual project-level impacts and provide the mechanism to mitigate them through fair share contributions in addition to the funding identified in the Revenue Constrained Network.

TRANS 5.2-15: I-5 southbound from Laurel Street to Hawthorn Street (Impact 5.2-15): SANDAG's RP2015 Regional Plan identifies ~~the construction of a managed lane~~ operational improvements along this segment to be completed by Year 2050. There is some uncertainty related to the actual improvements and associated traffic impacts that will materialize over time. Future development projects' transportation studies would be able to more accurately identify individual project-level impacts and provide the mechanism to mitigate them through fair share contributions in addition to the funding identified in the Revenue Constrained Network.

5.2.5.4 Ramp Meters

TRANS 5.2-16: ~~I-5 southbound/Sea World Drive Ramp (Impact 5.2-16). Ramp meter delays would decrease to less than 15 minutes if the ramp flow rate is increased from 444 cars per hour to 555 cars per hour. Improvements could include reducing the ramp meter cycle length or providing additional travel lanes. The City of San Diego shall coordinate with Caltrans to address ramp capacity at impacted on-ramp locations. Particularly, this impact could be reduced to less than significant by the following improvements: additional lanes, interchange reconfigurations, the implementation of a second interchange between Sea World Drive and Clairemont Drive (which is not currently included in the 2015 Regional Plan), and TDM as described in the Mobility Element in policies ME-8.1 through 8.7. Additionally, the proposed CPU includes a variety of transit, pedestrian, and bicycle facilities that may help to reduce single-occupancy vehicle travel which can help improve ramp capacity. However, specific capacity improvements are still undetermined, as these are future improvements that must be defined more over time. 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.

5.2.6 Significance of Impacts after Mitigation

While implementation of the potential mitigation measures identified above would reduce impacts to less than significant at all of the roadway segments and intersections (Impacts 5.2-1 through 5.2-8), all these improvements were not recommended as part of the proposed CPU or IFS for various reasons, such as they would be inconsistent with the mobility goals of the proposed CPU because they would impede implementation of planned pedestrian and bicycle improvements and realization of the proposed CPU's goals regarding walkability and bicycling. The measures would also be inconsistent with the project objective to maintain and enhance the pre-1872 community character of Old Town through land use and urban design policies and development regulations.

Due to the programmatic nature of the project, there is uncertainty as to the specific phasing of development including actual design and specific location of future projects, and thus, the timing of the proposed mitigation improvements. 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, transportation demand management measures, or a combination of these measures. Impacts to roadway segments and intersections would remain significant and unavoidable.

Likewise, impacts to Caltrans facilities (freeway segments and ramps, Impacts 5.2-9 through 5.2-16) would remain significant and 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 occurrence of the impact.

This page intentionally left blank.

5.3 Historical and Tribal Cultural Resources

This section analyzes the potential impacts on historical and tribal cultural resources due to implementation of the project. It documents the historical background for the Old Town community and addresses prehistoric and historic archaeological, built environment, and tribal cultural resources. The information in this section is based on the City of San Diego Draft Old Town Community Plan Area Historic Resources Survey Report: Historic Context & Reconnaissance Survey (Historic Resources Survey Report) (Galvin Preservation Associates Inc. 2017), the Community Plan Update for the Community of Old Town – Prehistoric Cultural Resources Report, City of San Diego, California (Cultural Constraints Analysis) (AECOM 2015), and other primary and secondary sources. These reports are included as Appendix D and Appendix E, respectively, to this PEIR.

5.3.1 Existing Conditions

A general discussion of the environmental setting relative to historical and tribal cultural resources and the applicable regulatory framework are summarized in Chapters 2.0 and 4.0, respectively.

5.3.2 Methodology

A Historic Resources Survey Report (addressing the built-environment) and a Cultural Constraints Analysis were prepared for the project. The Cultural Constraints Analysis describes the pre-history of the proposed CPU area, identifies known significant archaeological resources (prehistoric and historic periods), provides guidance on the identification of possible new significant archaeological resources, and includes recommendations for treatment of significant archaeological resources. The Historic Resources Survey Report provides information regarding the significant historical themes in the development of proposed Old Town area, the property types that convey those themes in an important way, and the location of potential historical resources within the community, including individual resources, and districts.

5.3.2.1 Prehistoric and Archaeological Resources

Cultural sensitivity levels for the proposed Old Town Community Plan area are rated low, moderate, or high based on the results of an archival records search conducted at the SCIC located at SDSU, a records update at the San Diego Museum of Man, a Sacred Lands File check by the NAHC, and regional environmental factors.

A low sensitivity rating indicates few or no previously recorded resources within the area. Resources at this level would not be expected to be complex, with little to no site structure or artifact diversity. The potential for identification of additional resources in such areas would be low. A moderate sensitivity rating indicates that some previously recorded resources were identified within the area. These are more

complex resources consisting of more site structure, diversity of feature types, and diversity of artifact types. The potential for the presence of additional resources in such areas would be moderate.

Areas identified as high sensitivity would indicate that the records search identified several previously recorded sites within the area. These resources may range from moderately complex to highly complex, with more-defined living areas or specialized work space areas, and a large breadth of features and artifact assemblages. The potential for identification of additional resources in such areas would be high. Sensitivity ratings may be adjusted based on the amount of disturbance that has occurred, which may have previously impacted archaeological resources.

Although the community of Old Town is developed, the area was extensively used and occupied by Native Americans prior to and during the historic periods of the community. The area in and around the community of Old Town is located along the former periodic shoreline of the San Diego River and at the base of hills, making it attractive for prehistoric activities. Several prehistoric campsites, as well as a possible location for the ethnographic village of *Kosaii*, have been mapped by the SCIC in this area. The community planning area also has an extensive historic occupation as the first Spanish Presidio and settlement in Alta California, active well into the 20th century. As such, the cultural sensitivity level for the community of Old Town is considered high.

5.3.2.2 Historical Resources

Resources within the Old Town San Diego State Historic Park were not surveyed as a part of the Historic Resources Survey Report (GPA 2017; Appendix D) as they have already been evaluated and designated. The CPU area is home to three properties listed in the NRHP: Casa de Estudillo, Old Town San Diego Historic District, and the San Diego Presidio. In addition, as of February 2017, the Old Town community is home to 37 designated historic resources that have been listed on the City's register by the Historical Resources Board. Of the 37 designated historic resources, 12 are built resources and historic sites within the Old Town San Diego State Historic Park District, 12 are built resources outside the Old Town San Diego State Historic Park District, and 13 are historic sites outside the Old Town San Diego State Historic Park District. In addition to the designated resources, one resource was identified as a state-owned property that appears eligible for listing on the National and/or California Register. There is also one potential historic district which appears to be eligible for local listing under the City's designation criteria and has 24 contributing parcels and one non-contributing parcel (Figure 5.3-1)

The Historic Resources Survey Report was conducted using a four-step approach, which included research, fieldwork, evaluation, and documentation. The research phase involved review of existing records and an archival records search. Existing information reviewed included: local landmark application forms; the current Old Town Community Plan; the Historical Resources Inventory for Middletown Area; and San Diego History, San Diego General Plan. Archival research was conducted at the San Diego History Center, the San Diego Public Library, and the Los Angeles Public Central Library.

The fieldwork phase consisted of a property-by-property inspection of the entire proposed CPU area. Field teams identified individual properties that appeared eligible for individual designation, as well as geographically definable areas that appeared eligible for designation as historic districts (Figure 5.3-2).



Source: SANDAG 2014; SanGIS 2017

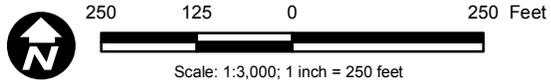


Figure 5.3-1
George Marston Historic District



Figure 5.3-2
Location of Potentially Eligible
City Register Designated Historic Resources

Old Town Community Plan Update PEIR

All properties identified in the field as potentially eligible for designation were then evaluated using the City of San Diego local designation criteria. Properties determined potentially eligible for designation on the City's Register were then evaluated for the NRHP and CRHR. All properties identified and evaluated as potentially eligible for listing on the San Diego Register, CRHR, and/or NRHP designation as part of this survey were then documented in a database. All survey reports were analyzed and synthesized into the final Historic Resources Survey Report, including the historic context statement, which establishes the significant themes and property types that reflect those themes, and reconnaissance survey data.

5.3.3 Significance Determination Thresholds

Historical resources significance determination, pursuant to the City of San Diego's Significance Determination Thresholds, consists first of determining the sensitivity or significance of identified historical resources and, secondly, determining direct and indirect impacts that would result from project implementation. Based on the City's 2016 Significance Determination Thresholds, which have been adapted to guide a programmatic assessment of the project, impacts related to historical resources would be significant if the project would result in any of the following:

1. An alteration, including the adverse physical or aesthetic effects and/or the destruction of a historic building (including an architecturally significant building), structure, object or site;
2. A substantial adverse change in the significance of a prehistoric archaeological resource, a religious or sacred use site, or the disturbance of any human remains, including those interred outside of formal cemeteries.
3. A substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code Section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is:
 - a. Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code section 5020.1(k), or
 - b. A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1. In applying the criteria set forth in subdivision (c) of Public Resources Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.

The City of San Diego's CEQA Significance Determination Thresholds define a significant historical resource as one that qualifies for the CRHR or is listed in a local historic register or deemed significant in a historical resource survey, as provided under Section 5024.1(g) of the Public Resources Code, although even a resource that is not listed in, or determined eligible for listing in, the CRHR, not included in a local register, or not deemed significant in a historical resource survey may nonetheless be historically significant for the purposes of CEQA. The City's Historical Resources Guidelines state the significance of a resource may be determined based on the potential for the resource to address important research questions as documented in a site-specific technical report prepared as part of the environmental review process.

Research priorities for the prehistoric, ethnohistoric, and historic periods of San Diego history are discussed in Appendix A to the City's Historical Resources Guidelines. As a baseline, the City of San Diego has established the following criteria to be used in the determination of significance under CEQA:

- An archaeological site must consist of at least three associated artifacts/ecofacts (within a 50 square meter area) or a single feature and must be at least 45 years of age. Archaeological sites containing only a surface component are generally considered not significant, unless demonstrated otherwise. Such site types may include isolated finds, bedrock milling stations, sparse lithic scatters, and shellfish processing stations. All other archaeological sites are considered potentially significant. The determination of significance is based on a number of factors specific to a particular site including site size, type and integrity; presence or absence of a subsurface deposit, soil stratigraphy, features, diagnostics, and datable material; artifact and ecofact density; assemblage complexity; cultural affiliation; association with an important person or event; and ethnic importance.
- The determination of significance for historic buildings, structures, objects and landscapes is based on age, location, context, association with an important person or event, uniqueness, and integrity.
- A site will be considered to possess ethnic significance if it is associated with a burial or cemetery; religious social or traditional activities of a discrete ethnic population; an important person or event as defined by a discrete ethnic population; or the mythology of a discrete ethnic population.

5.3.4 Impact Analysis

Issue 1 Historic Structures, Objects, or Sites

Would the project result in an alteration, including the adverse physical or aesthetic effects and/or the destruction of a historic building (including an architecturally significant building), structure, object, or site?

a. Individual Local Historic Resources

Of the 143 properties surveyed for the Historical Resources Survey Report (GPA 2017; Appendix D), the survey identified 21 properties as potential individual resources (see Figure 5.3-2, as well as one potential historic district and one building potentially eligible for the NRHP and CRHR. The resources identified can be found in the Historical Resources Survey Report (GPA 2017; Appendix D). Of the resources identified as potentially significant individual resources, approximately 43 percent are residential properties; 28 percent are restaurants; 14 percent are commercial properties; and the remaining 15 percent are a general use building, an auto court, and a church. Thematically, the potentially significant individual resources are distributed among the key historical eras and themes of the development of the Old Town community as follows:

- American Transition Period: 1846–1872: 0 percent
- Early American Development and Industrialization: 1873–1929: 38 percent
- Automobile, Early Tourism, and Preservation Phase I and II: 1904–1939, 1950–1970: 38 percent

- Great Depression and World War II: 1930–1945: 0 percent
- Post World War II: 1946-1970: 24 percent

While the SDMC does provide for the regulation and protection of designated and potential historical resources, it is impossible to ensure the successful preservation of all historic built environment resources within the proposed CPU area. Although the project does not propose specific development, future development and related construction activities facilitated by the project at the project level could result in the alteration of a historic building, structure, object, or site. Direct impacts of specific projects may include substantial alteration, relocation, or demolition of historic buildings, structures, objects, sites, and districts. Indirect impacts may include the introduction of visual, audible, or atmospheric effects that are out of character with a historic property or alter its setting, when the setting contributes to the resource's significance. Thus, potential impacts to individual historic resources could occur where implementation of the project would result in increased development potential. Thus, impacts would be considered significant.

b. Potential Historic Districts Identified in the Historic Resources Survey

The Historical Resources Survey Report identified one new potential Historic District containing a total of approximately 24 contributing parcels and one non-contributing parcel. This newly identified potential historic district is the George Marston Historic District, which is an intact grouping of single- and multi-family residences located north of Juan Street and east of the Presidio Hill Golf Course. The location, style, and year built are summarized in Table 5.3-1, and their locations are shown in Figure 5.3-2. The contributing parcels include residences from the period of significance of 1938–1955. It appears significant under the Great Depression and World War II and Post World War II themes.

Since the project would not increase development potential within the identified potential Historic District, the project would not result in a significant impact to these areas. However, indirect impacts to the potential Historic District could occur with future project-level development of the surrounding area.

c. Multiple Property Listing

A Multiple Property Listing (MPL) is a group of related significant properties with shared themes, trends, and patterns of history. The Historical Resources Survey Report has not identified any thematically related property groupings that appear eligible as MPLs. However, the Historic Preservation Element does note the potential that properties within the proposed CPU area could be included in future City-wide MPLs addressing themes such as defense-industry resources. Any such resources would be evaluated when and if such an MPL is established.

While existing regulations (described in Section 4.3 of this PEIR) do provide for the protection of designated and potential historical resources, it is impossible to ensure the successful preservation of all historic built environment resources within the proposed CPU area. Thus, potential impacts to historic buildings, structures, objects, or sites could occur where implementation of the project would result in increased development potential.

Impact 5.3-1: Implementation of the project could result in an alteration of a historic building, structure, object, or site where an increase in density is proposed beyond the adopted Community Plan and current zoning.

Location	Style	Year Built
2641 Jackson Street	Minimal Traditional	1938
2606 Juan Street	Minimal Traditional	1948
2612 Juan Street	Tract Ranch	1948
2628 Juan Street	Tract Ranch	1948
2634 Juan Street	Minimal Traditional	1948
2646 Juan Street	Tract Ranch	1948
2654 Juan Street	Minimal Traditional	1948
2664 Juan Street	Tract Ranch	1948
4119 Mason Street	Minimal Traditional	1952
4129 Mason Street	Tract Ranch	1941
4205 Mason Street	Minimal Traditional	1938
2609 Sunset Street	Tract Ranch	1942
2621 Sunset Street	Minimal Traditional	1941
2631 Sunset Street	Minimal Traditional	1940
2635 Sunset Street	Tract Ranch	1955
2636 Sunset Street	Minimal Traditional	1938
2646 Sunset Street	Minimal Traditional	1938
2647 Sunset Street	Minimal Traditional	1947
2655 Sunset Street	Minimal Traditional	1950
2660 Sunset Street	Minimal Traditional	1938
2663 Sunset Street	Tract Ranch	1939
2664 Sunset Street	Minimal Traditional	1939
4120 Twiggs Street	Tract Ranch	1948
4134 Twiggs Street	Tract Ranch	1941

Source: GPA 2017

Issue 2 Prehistoric and Historic Archaeological Resources, Sacred Sites, and Human Remains

Would the project result in a substantial adverse change in the significance of a prehistoric or historic archaeological resource, a religious or sacred use site, or the disturbance of any human remains, including those interred outside of formal cemeteries?

According to the Cultural Constraints Analysis, 50 archaeological and cultural resources have been previously recorded within the community of Old Town. These resources consist of two prehistoric sites, three multi-component resources, 28 historic archaeological resources, and 17 are built historic resources.

The prehistoric resources include one lithic and shell scatter and one prehistoric village site. The multi-component sites consist of the "Old Spanish Fort" with associated prehistoric artifacts, a historic residence with a prehistoric temporary camp, and a historic refuse deposit with a prehistoric lithic scatter and possible prehistoric shell scatter. The historic resources include 17 refuse deposits; six foundations with either associated walls, wells, or refuse deposits; three wells or privies with refuse deposits; one well; one brick rubble pile with associated metal pipes; and one tile floor. In addition, several key areas have been identified that may be of high level of interest to local Native American communities. Many of these are listed on registers for the City's Historical Resources Board, the California Historic Landmarks, and

the National Historic Landmarks, or have not been formally recognized. These include the prehistoric Rancheria of *Kosaii/Kosa'aay/Cosoy*; the Presidio de San Diego; El Campo Santo; the Protestant Cemetery; Palm Canyon Waterworks; Crosthwaite Well Feature; Spanish/Mexican period tiles and trash deposits; Presidio Hills Golf Course; railroad lines; the Derby Dike; El Camino Real; La Playa Trail and Road; Old Highway 101 and Pacific Coast Highway; and unidentified privies, wells, and trash deposits. Despite ethnohistoric and historic information about the prehistoric Rancheria of *Kosaii/Kosa'aay/Cosoy* and presence of Kumeyaay in the area, the Sacred Lands File check from the Native American Heritage Commission (NAHC) indicated that no sacred lands have been identified within the vicinity of the community of Old Town.

Based on the results of the records search, the NAHC Sacred Lands File check, and known regional environmental factors, the community of Old Town has a high cultural sensitivity level for the presence of archaeological resources, primarily of the historic period. Beginning with early Spanish establishment of the Presidio, the area has played a pivotal role in the historic development of the San Diego region. Prior to the arrival of the Spanish, the area was extensively occupied and exploited by Native Americans, further contributing to the community's rich cultural heritage and sensitivity for archaeological resources. As such, the archaeological sensitivity level for the community of Old Town is high, which should be a primary consideration during the community plan update process.

Participation of the local Native American community is crucial to the effective identification and protection of cultural resources within the community of Old Town in accordance with the City's Historical Resources Guidelines (City of San Diego 2001). Native American participation is required for all levels of future investigations in the community of Old Town, including those areas that have been previously developed, unless additional information can be provided to demonstrate that the property has been graded to a point where no resources could be impacted. Areas that have not been previously developed should be surveyed to determine potential for historical resources to be encountered, and whether additional evaluation is required. In areas that have been previously developed, additional ground-disturbing activities may require further evaluation and/or monitoring.

Although limited undeveloped land exists within the proposed CPU area, future development and related construction activities facilitated by the proposed CPU at the project level could result in the alteration or destruction of prehistoric or historic archaeological resources, objects, or sites and could impact religious or sacred uses, or disturb human remains, particularly considering the cultural significance of the Old Town area. Direct impacts may include substantial alteration or demolition of archaeological sites from grading, excavation, or other ground-disturbing activities. Indirect impacts may include the potential for vandalism or destruction of an archaeological resource or traditional cultural property.

Avoiding impacts on religious or sacred places or human remains may be unavoidable in certain circumstances when resources are discovered during construction. Although there are no known religious or sacred uses within the proposed CPU area, the potential exists for these to be encountered during future construction activities associated with implementation of the project, particularly given the high cultural sensitivity of canyon areas leading into the Mission Valley area, which has been previously identified as an area of concern to the local Native American community, and in proximity to the Presidio and areas bordering Old Town. As previously noted, although several historic period cemeteries containing Native American and Old Town descendent burials are well documented in the proposed CPU area, the potential for encountering additional human remains anywhere in the CPU area is high, during

both archaeological investigations and grading activities. Therefore, tribal consultation in accordance with AB 52 and the Public Resources Code, as well as consultation with the Old Town descendent community has been incorporated into the Mitigation Framework for subsequent projects to ensure that tribal cultural resources and descendent community concerns are addressed early in the development review process.

The City has developed Historical Resource Sensitivity Maps that provide general locations of where historical resources are known to occur or have the potential to occur. These maps were developed in coordination with technical experts and tribal representatives. Upon submittal of ministerial and/or discretionary permit applications, a parcel is reviewed against the Historical Resource Sensitivity Maps specifically to determine whether the project has the potential to adversely impact an archaeological resource which may be eligible for individual listing on the local register (SDMC Section 143.0212). This review is supplemented with a project specific records search of the NAHC Sacred Lands File by qualified staff, and as stated above, a site-specific archaeological survey would be required.

The proposed CPU is designed to support the historic preservation goals of the City's General Plan, and contains policies requiring protection and preservation of significant archaeological resources in the proposed Historic Preservation Element. Native American consultation early in the project review process is also included in the proposed CPU to identify prehistoric and historic archaeological cultural resources and to develop adequate treatment and mitigation for significant archaeological sites with cultural and religious significance to the Native American community in accordance with all applicable local, state and federal regulations and guidelines.

While existing regulations contained in the SDMC, and proposed CPU policies would provide for the regulation and protection of prehistoric and historic archaeological resources and human remains, it is impossible to ensure the successful preservation of all prehistoric and historic archaeological resources. Therefore, potential impacts to archaeological resources are considered significant.

Impact 5.3-2: Implementation of the project could adversely impact a prehistoric or historic archaeological resources including religious or sacred use sites and human remains.

Issue 3 Tribal Cultural Resources

Would the project result in a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code Section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is:

1. *Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code section 5020.1(k), or*
2. *A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1. In applying the criteria set forth in subdivision (c) of Public Resources Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.*

In 2008, the Planning Department began the initiation process to update the Midway/Pacific Highway Corridor Community Plan. As part of that process, the City requested a list of California Native American Tribes that are traditionally and culturally affiliated with the geographic area from the NAHC. In August of

2009, notices were sent to the contacts identified by the NAHC; however, no responses were received requesting consultation on the project. During the course of the next three years, a series of public workshops were held to develop a draft plan, and an archaeological consultant was retained to assist the City with developing a constraints analysis for the CPU. In 2011, a Sacred Lands File Check of the NAHC was requested. The NAHC response indicated that although no sacred lands were identified in the vicinity of the community plan area, they recommended consultation with tribal entities and other interested parties be conducted as part of the environmental review process. An updated list of contacts specific to the project area for that purpose was provided by the NAHC.

An NOP was released in October 2015, several months after the passage of AB 52. At that time, the City of San Diego had not yet received any formal requests for notification by a California Native American tribe that is traditionally and culturally affiliated with the geographic area of the proposed CPU, and therefore, formal consultation under AB 52 was not initiated. During this time, however, the City had already provided notification to locally affiliated tribes in accordance with SB 18 and no requests for consultation were requested. On June 30, 2016, the City received letters and maps from the Lipay Nation of Santa Ysabel and Jamul Indian Village identifying their traditionally and culturally affiliated areas within the City of San Diego's jurisdictional boundaries for the purpose of AB 52 notification, which includes the CPU area. In July 2017, letters were sent to both tribes informing them that a Draft PEIR was being prepared for the project, and requesting if consultation was required in accordance with the provisions of AB 52. Although no response was received within the prescribed timeframe, information about the proposed CPU project scope, records search results, and proposed mitigation framework for subsequent project review was presented at a subsequent monthly tribal consultation meeting in November 2017. The City's programmatic approach to future "project-level" environmental review was discussed, including assurance that AB 52 consultation would be implemented during project-specific environmental review when known resources are present or a potential exists for resources to be encountered. All concurred and consultation was concluded. A subsequent consultation was requested by Jamul Indian Village and conducted at the monthly tribal consultation meeting on March 16, 2018. Additional information was shared with the tribal representative, and the subsequent project evaluation process included in the Mitigation Framework was further discussed. No new issues or concerns were raised with respect to the CPU process and the subsequent consultation was concluded.~~In November 2017, the project scope and EIR analysis was discussed with both tribal representatives, at which time it was determined that formal consultation would not be required for community plan updates and that the subsequent projects implemented in accordance with the adopted CPU and Mitigation Framework would be subject to the provisions of AB 52 and may require tribal consultation at that time.~~

As stated in Section 2.3.3.2, the Sacred Lands File check from the NAHC indicated that no sacred lands have been identified within the vicinity of the proposed CPU area. Several key areas have been identified that may be of high level of interest to local Native American communities. Many of these are already listed on the City's Historical Resources Register (HRR), the CRHR, and the NRHP, or have not been formally recognized. For any subsequent projects implemented in accordance with the proposed CPU where a recorded archaeological site or Tribal Cultural Resource (as defined in the Public Resources Code) is identified, the City would be required to initiate consultation with identified California Indian tribes pursuant to the provisions in Public Resources Code Sections 21080.3.1 and 21080.3.2, in accordance with AB 52. Results of the consultation process will determine the nature and extent of any additional archaeological evaluation or changes to the project and appropriate mitigation measures for direct impacts that cannot be avoided.

Native American consultation early in the project review process is also included in the proposed CPU to identify tribal cultural resources and to develop adequate treatment and mitigation for significant archaeological sites with cultural and religious significance to the Native American community in accordance with all applicable local, state and federal regulations and guidelines.

While existing regulations, the SDMC, and proposed CPU policies would provide for the regulation and protection of tribal cultural resources, it is impossible to ensure the successful preservation of all archaeological resources. Therefore, potential impacts to tribal cultural resources are considered significant.

Impact 5.3-3: Implementation of the project could adversely impact a tribal cultural resource.

5.3.5 Significance of Impacts

5.3.5.1 Historic Structures, Objects, or Sites

Implementation of the project could result in an alteration of a historic building, structure, object, or site where an increase in density is proposed beyond the adopted Community Plan or current zoning (**Impact 5.3-1**). These impacts would be significant.

5.3.5.2 Prehistoric and Historic Archaeological Resources, Sacred Sites, and Human Remains

Implementation of the project could adversely impact prehistoric or historic archaeological resources, including religious or sacred use sites and human remains (**Impact 5.3-2**). These impacts would be significant.

5.3.5.3 Tribal Cultural Resources

Implementation of the project could adversely impact tribal cultural resources (**Impact 5.3-3**). These impacts would be significant.

5.3.6 Mitigation Framework

The City of San Diego's General Plan, combined with federal, state, and local regulations, provides a regulatory framework for project-level historical resources evaluation/analysis criteria and, when applicable, mitigation measures for future discretionary projects. All development projects with the potential to affect historical resources—such as designated historical resources; historical buildings, districts, landscapes, objects, and structures; important archaeological sites; tribal cultural resources; and traditional cultural properties—are subject to site-specific review in accordance with the City's Historical Resources Regulations and Historical Resources Guidelines, through the subsequent project review process. The following mitigation measures (**HIST 5.3-1** and **HIST 5.3-2**) provide a framework that would be required of all development projects with the potential to impact significant tribal cultural, archaeological, and/or historical resources.

HIST 5.3-1: Historic Buildings, Structures, and Objects

Prior to issuance of any permit for a development project implemented in accordance with the project that would directly or indirectly affect a building/structure in excess of 45 years of age, the City shall determine whether the affected building/structure is historically significant. The evaluation of historic architectural resources shall be based on criteria such as age, location, context, association with an important person or event, uniqueness, or structural integrity, as indicated in the Historical Resources Guidelines.

Preferred mitigation for historic buildings or structures shall be to avoid the resource through project redesign. If the resource cannot be entirely avoided, all prudent and feasible measures to minimize harm to the resource shall be taken. Depending upon project impacts, measures shall include, but are not limited to:

- Preparing a historic resource management plan;
- Adding new construction that is compatible in size, scale, materials, color, and workmanship to the historical resource (such additions, whether portions of existing buildings or additions to historic districts, shall be clearly distinguishable from historic fabric);
- Repairing damage according to the Secretary of the Interior's Standards for Rehabilitation;
- Screening incompatible new construction from view through the use of berms, walls, and landscaping in keeping with the historic period and character of the resource; and
- Shielding historic properties from noise generators through the use of sound walls, double glazing, and air conditioning.

Specific types of historical resource reports, outlined in Section III of the Historical Resources Guidelines, are required to document the methods to be used to determine the presence or absence of historical resources, to identify potential impacts from a proposed project, and to evaluate the significance of any historical resources identified. If potentially significant impacts to an identified historical resource are identified, these reports will also recommend appropriate mitigation to reduce the impacts to below a level of significance, where possible. If required, mitigation programs can also be included in the report.

HIST5.3-2: Archaeological and Tribal Cultural Resources

Prior to issuance of any permit for a future development project implemented in accordance with the project that could directly affect an archaeological or tribal cultural resource, or a resource important to the descendant community of Old Town, the City shall require that the following steps be taken to determine (1) the presence of archaeological or tribal cultural resources, or a resource important to the descendant

community of Old Town, and (2) the appropriate mitigation for any significant resources which may be impacted by a development activity. Sites may include, but are not limited to, residential and commercial properties, privies, trash pits, building foundations, and industrial features representing the contributions of people from diverse socio-economic and ethnic backgrounds. Sites may also include resources associated with prehistoric Native American activities.

Initial Determination

The environmental analyst will determine the likelihood for the project site to contain historical resources by reviewing site photographs and existing historic information (e.g., Archaeological Sensitivity Maps, the Archaeological Map Book, and the City's "Historical Inventory of Important Architects, Structures, and People in San Diego") and may conduct a site visit, as needed. If there is any evidence that the site contains archaeological or tribal cultural resources, then an archaeological evaluation consistent with the City Guidelines would be required. All individuals conducting any phase of the archaeological evaluation program must meet professional qualifications in accordance with the City Guidelines.

Step 1:

Based on the results of the Initial Determination, if there is evidence that the site contains a historical resource, preparation of a historic evaluation is required. The evaluation report would generally include background research, field survey, archaeological testing and analysis. Before actual field reconnaissance would occur, background research is required, which includes a records search at the SCIC at San Diego State University. Site records from the San Diego Museum of Man are now included in the data provided by the SCIC; however, in some instances, supplemental research at the Museum of Man may be required. A review of the Sacred Lands File maintained by the NAHC must also be conducted at this time. Information about existing archaeological collections should also be obtained from the San Diego Archaeological Center and any tribal repositories or museums.

In addition to the records searches mentioned above, background information may include, but is not limited to, examining primary sources of historical information (e.g., deeds and wills), secondary sources (e.g., local histories and genealogies), Sanborn Fire Maps, and historic cartographic and aerial photograph sources; reviewing previous archaeological research in similar areas, models that predict site distribution, and archaeological, architectural, and historical site inventory files; and conducting informant interviews, including consultation with the descendant community of Old Town. The results of the background information would be included in the evaluation report.

Once the background research is complete, a field reconnaissance must be conducted by individuals whose qualifications meet the standards outlined in the City Guidelines. Consultants are encouraged to employ innovative survey techniques when conducting enhanced reconnaissance, including, but not limited to, remote sensing, ground penetrating radar, and other soil resistivity techniques as determined on a case-by-case

basis. Native American participation is required for field surveys when there is likelihood that the project site contains prehistoric or historic archaeological resources or traditional cultural properties. If through background research and field surveys historical resources are identified, then an evaluation of significance, based on the City Guidelines, must be performed by a qualified archaeologist.

Step 2

Where a recorded archaeological site or Tribal Cultural Resource (as defined in the Public Resources Code) is identified, the City would be required to initiate consultation with identified California Indian tribes pursuant to the provisions in Public Resources Code Sections 21080.3.1 and 21080.3.2., in accordance with AB 52. It should be noted that during the consultation process, tribal representative(s) will be directly involved in making recommendations regarding the significance of a tribal cultural resource that also could be a prehistoric archaeological site. A testing program may be recommended which requires reevaluation of the project in consultation with the Native American representative, which could result in a combination of project redesign to avoid and/or preserve significant resources as well as mitigation in the form of data recovery and monitoring (as recommended by the qualified archaeologist and Native American representative). The archaeological testing program, if required shall include evaluating the horizontal and vertical dimensions of a site, the chronological placement, site function, artifact/ecofact density and variability, presence/absence of subsurface features, and research potential. A thorough discussion of testing methodologies, including surface and subsurface investigations, can be found in the City Guidelines. Results of the consultation process will determine the nature and extent of any additional archaeological evaluation or changes to the project.

The results from the testing program shall be evaluated against the Significance Determination Thresholds found in the Guidelines. If significant historical resources are identified within the Area of Potential Effects, the site may be eligible for local designation. However, this process would not proceed until such time that the tribal consultation has been concluded and an agreement is reached (or not reached) regarding significance of the resource and appropriate mitigation measures are identified. When appropriate, the final testing report must be submitted to Historical Resources Board staff for eligibility determination and possible designation. An agreement on the appropriate form of mitigation is required prior to distribution of a draft environmental document. If no significant resources are found, and site conditions are such that there is no potential for further discoveries, then no further action is required. Resources found to be non-significant as a result of a survey and/or assessment will require no further work beyond documentation of the resources on the appropriate Department of Parks and Recreation site forms and inclusion of results in the survey and/or assessment report. If no significant resources are found, but results of the initial evaluation and testing phase indicates there is still a potential for resources to be present in portions of the property that could not be tested, then mitigation monitoring is required.

Step 3:

Preferred mitigation for historical resources is to avoid the resource through project redesign. If the resource cannot be entirely avoided, all prudent and feasible measures to minimize harm shall be taken. For archaeological resources where preservation is not an option, a Research Design and Data Recovery Program is required, which includes a Collections Management Plan for review and approval. When tribal cultural resources are present and also cannot be avoided, appropriate and feasible mitigation will be determined through the tribal consultation process and incorporated into the overall data recovery program, where applicable, or project-specific mitigation measures incorporated into the project. The data recovery program shall be based on a written research design and is subject to the provisions as outlined in CEQA Section 21083.2. The data recovery program must be reviewed and approved by the City's Environmental Analyst prior to distribution of a draft CEQA document and shall include the results of the tribal consultation process. Archaeological monitoring may be required during building demolition and/or construction grading when significant resources are known or suspected to be present on a site, but cannot be recovered prior to grading due to obstructions such as, but not limited to, existing development or dense vegetation.

A Native American observer must be retained for all subsurface investigations, including geotechnical testing and other ground-disturbing activities, whenever a Native American tribal cultural resource or any archaeological site located on City property or within the Area of Potential Effects of a City project would be impacted. In the event that human remains are encountered during data recovery and/or a monitoring program, the provisions of Public Resources Code Section 5097 must be followed. In the event that human remains are discovered during project grading, work shall halt in that area and the procedures set forth in the California Public Resources Code (Section 50987.98) and State Health and Safety Code (Section 7050.5), and in the federal, state, and local regulations described above shall be undertaken. These provisions will be outlined in the MMRP included in a subsequent project-specific environmental document. The Native American monitor shall be consulted during the preparation of the written report, at which time they may express concerns about the treatment of sensitive resources. If the Native American community requests participation of an observer for subsurface investigations on private property, the request shall be honored.

Step 4:

Archaeological Resource Management reports shall be prepared by qualified professionals as determined by the criteria set forth in Appendix B of the Guidelines. The discipline shall be tailored to the resource under evaluation. In cases involving complex resources, such as traditional cultural properties, rural landscape districts, sites involving a combination of prehistoric and historic archaeology, or historic districts, a team of experts will be necessary for a complete evaluation.

Specific types of historical resource reports are required to document the methods (see Section III of the Guidelines) used to determine the presence or absence of historical resources; to identify the potential impacts from proposed development and evaluate the

significance of any identified historical resources; to document the appropriate curation of archaeological collections (e.g. collected materials and the associated records); in the case of potentially significant impacts to historical resources, to recommend appropriate mitigation measures that would reduce the impacts to below a level of significance; and to document the results of mitigation and monitoring programs, if required.

Archaeological Resource Management reports shall be prepared in conformance with the California Office of Historic Preservation "Archaeological Resource Management Reports: Recommended Contents and Format" (see Appendix C of the Guidelines), which will be used by Environmental staff in the review of archaeological resource reports. Consultants must ensure that archaeological resource reports are prepared consistent with this checklist. This requirement will standardize the content and format of all archaeological technical reports submitted to the City. A confidential appendix must be submitted (under separate cover) along with historical resources reports for archaeological sites and tribal cultural resources containing the confidential resource maps and records search information gathered during the background study. In addition, a Collections Management Plan shall be prepared for projects that result in a substantial collection of artifacts and must address the management and research goals of the project and the types of materials to be collected and curated based on a sampling strategy that is acceptable to the City. Appendix D (Historical Resources Report Form) may be used when no archaeological resources were identified within the project boundaries.

Step 5:

For Archaeological Resources: All cultural materials, including original maps, field notes, non-burial related artifacts, catalog information, and final reports recovered during public and/or private development projects must be permanently curated with an appropriate institution, one that has the proper facilities and staffing for ensuring research access to the collections consistent with state and federal standards, unless otherwise determined during the tribal consultation process. In the event that a prehistoric and/or historic deposit is encountered during construction monitoring, a Collections Management Plan would be required in accordance with the project MMRP. The disposition of human remains and burial related artifacts that cannot be avoided or are inadvertently discovered is governed by state (i.e., AB 2641 [Coto] and California Native American Graves Protection and Repatriation Act of 2001 [Health and Safety Code 8010-8011]) and federal (i.e., Native American Graves Protection and Repatriation Act [U.S.C. 3001-3013]) law, and must be treated in a dignified and culturally appropriate manner with respect for the deceased individual(s) and their descendants. Any human bones and associated grave goods of Native American origin shall be turned over to the appropriate Native American group for repatriation.

Arrangements for long-term curation of all recovered artifacts must be established between the applicant/property owner and the consultant prior to the initiation of the field reconnaissance. When tribal cultural resources are present, or non-burial-related artifacts associated with tribal cultural resources are suspected to be recovered, the treatment

and disposition of such resources will be determined during the tribal consultation process. This information must then be included in the archaeological survey, testing, and/or data recovery report submitted to the City for review and approval. Curation must be accomplished in accordance with the California State Historic Resources Commission's Guidelines for the Curation of Archaeological Collection (dated May 7, 1993) and, if federal funding is involved, Title 36 of the CFR, Part 79. Additional information regarding curation is provided in Section II of the Guidelines.

5.3.7 Significance of Impacts after Mitigation

5.3.7.1 Historic Structures, Objects, or Sites

Development implemented in accordance with the project that would potentially result in impacts to significant historical resources would be required to incorporate mitigation measure **HIST 5.3-1**, to be adopted in conjunction with the certification of this PEIR and consistent with existing requirements of the Historic Resources Regulations and Historic Resources Guidelines. The mitigation framework combined with the proposed CPU policies promoting the identification and preservation of historical resources would reduce the program-level impact related to historical resources of the built environment. However, even with implementation of the mitigation framework, the degree of future impacts and applicability, feasibility, and success of future mitigation measures cannot be adequately known for each specific future project at this program level of analysis.

Modifications made to resources within the Old Town San Diego State Historic Park (~~State Historic Park~~) are outside of the City's jurisdiction, and would be addressed in consultation with the State Office of Historic Preservation (SHPO) during the California Department of Parks and Recreation CEQA process. Because additional development potential is not proposed in that area, implementation of the project would not have an adverse effect on any of the California or National Register listed properties within the Old Town San Diego State Historic Park. However, in other areas where development potential would increase compared to the adopted Community Plan and current PDO, potential impacts to historical resources would remain significant and unavoidable. Thus, potential impacts to historical resources, including historic structures, objects, or sites, would be significant and unavoidable.

5.3.7.2 Prehistoric ~~or~~ and Historic Archaeological Resources, Sacred Sites, and Human Remains

Development implemented in accordance with the project would potentially result in impacts to significant archaeological resources, and therefore would be required to implement mitigation measure **HIST 5.3-2**, which addresses measures to minimize impacts to archaeological resources. This mitigation, combined with the policies of the General Plan and proposed CPU policies promoting the identification, protection, and preservation of archaeological resources, in addition to compliance with CEQA and Public Resources Code Section 21080.3.1 requiring tribal consultation early in the development review process, and the City's Historic Resources Regulations (SDMC Section 143.0212), which requires review of ministerial and discretionary permit applications for any parcel identified as sensitive on the Historical Resources Sensitivity Maps, would reduce the program-level impact related to prehistoric or historical archaeological resources. However, even with application of the existing regulatory framework and mitigation framework which would avoid future project-level impacts, the feasibility and efficacy of mitigation measures cannot

be determined at this program level of analysis. Thus, potential impacts to prehistoric and historic archaeological resources, sacred sites, and human remains would be minimized but would remain significant and unavoidable.

5.3.7.3 Tribal Cultural Resources

Development implemented in accordance with the project would potentially result in impacts to significant tribal cultural resources, and therefore, would be required to implement mitigation measure **HIST 5.3-2**, which addresses measures to minimize impacts to tribal cultural resources. This mitigation, combined with the policies of the General Plan and proposed CPU policies promoting the identification, protection, and preservation of archaeological resources, in addition to compliance with CEQA and Public Resources Code Section 21080.3.1 requiring tribal consultation early in the development review process, and the City's Historical Resources Regulations (SDMC Section 143.0212), which requires review of ministerial and discretionary permit applications for any parcel identified as sensitive on the Historical Resources Sensitivity Maps would reduce the program-level impact related to tribal cultural resources. However, even with application of the existing regulatory framework and mitigation framework which would avoid future project-level impacts, the feasibility and efficacy of mitigation measures cannot be determined at this program level of analysis. Thus, potential impacts to tribal cultural resources would be minimized but would remain significant and unavoidable.

This page intentionally left blank.

5.4 Geologic Conditions

Wilson Geosciences, Inc. prepared a Seismic and Geologic Technical Background Report for the City of San Diego Midway-Pacific Highway and Old Town Community Plan Updates, and Environmental Impact Report, City of San Diego, San Diego County, California (Geotechnical Report [April 2012]). That analysis addresses geotechnical impacts associated with the two proposed CPUs, including the project. AECOM prepared an update letter (AECOM 2017) to the 2012 report that presents recently acquired geologic information. The Geotechnical Report and update letter are included as Appendix F to this PEIR. An update to the Geotechnical Report has been prepared by AECOM (2017) and is also included in Appendix F. This section presents a summary of the findings made in the report and update and the associated analysis of potential impacts.

5.4.1 Existing Conditions

The existing environmental setting and regulatory framework are summarized in Chapters 2.0 and 4.0, respectively.

Soil and geologic conditions are described in detail in Section 2.3.4 of this PEIR. In summary, the proposed CPU area is underlain by artificial fill surficial deposits, with some areas underlain by old paralic deposits – (Qop Unit 6), and very old paralic deposits – (Qvop Unit 11). The geologic formations in the proposed CPU area include the Mission Valley Formation and the San Diego Formation. Figure 2-5 illustrates the location of the geologic units located within the Old Town Community Plan area.

The City of San Diego Seismic Safety Study, Geologic Hazards and Faults (2008), maps the proposed CPU area as high potential for liquefaction (Geologic Hazard Category 31), having nominal to moderate risk of slope instability (Geologic Hazard Category 51 and 53). Fault buffer zones (Geologic Hazard Category 12) with a low to moderate risk of surface fault rupture cross the proposed Old Town CPU area. Figure 2-6 provides a map of geologic hazards for the proposed CPU area as identified in the Geotechnical Report (Wilson Geosciences 2012; Appendix F).

5.4.2 Significance Determination Thresholds

Thresholds used to evaluate potential impacts to geologic conditions are based on applicable criteria in the City of San Diego's CEQA Significance Determination Thresholds (2016). Thresholds reflect the programmatic analysis for the project. For impacts related to geologic conditions, a significant impact could occur if implementation of the project would:

1. Expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving:

- Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault,
 - Strong seismic ground shaking,
 - Seismic-related ground failure, including liquefaction, or
 - Landslides;
2. Result in substantial soil erosion or the loss of topsoil;
 3. Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction, or collapse; or
 4. Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial risks to life or property.

This section does not include analysis related to the capacity of soils to support septic tanks or alternative wastewater disposal systems, since sewers are available throughout the proposed CPU area.

5.4.3 Impact Analysis

Issue 1 Seismic Hazards

Would the project expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving rupture of a known earthquake fault, strong seismic ground shaking, seismic-related ground failure, including liquefaction, or landslides?

Future development associated with implementation of the project could result in the exposure of more people, structures, and infrastructure to seismic hazards.

A geotechnical investigation that specifically addresses surface fault-rupture hazard is required for land planning and land development permits for proposed projects located in the fault buffer zones. Fault buffer zones (Geologic Hazard Category 12) affect approximately 20 percent of the proposed CPU area. As previously indicated, recent studies have identified active faults within the proposed CPU area (Singleton et al., 2017) that will necessitate revision of the City of San Diego Seismic Safety Study, Geologic Hazards and Faults maps (City of San Diego 2008). In addition, it is likely that these studies will result in the State Geologist expanding the Alquist-Priolo Earthquake Fault Zone to encompass sufficiently active and well defined faults in the proposed CPU area. Until more precise fault study zone maps can be published, site-specific fault investigation would be performed as part of the required geotechnical investigation prior to proposing development within the Rose Canyon fault zone.

The proposed CPU area will be subjected to hazards caused by ground shaking during seismic events on regional active faults. According to the United States Geological Survey (USGS), six known active faults are located within a search radius of 50 miles from the proposed CPU area. The nearest known active

faults are Rose Canyon, Coronado Bank, and Newport-Inglewood (Offshore) (see Table 5.4-1), and are the dominant source of potential ground motion. Table 5.4-1 lists the estimated maximum earthquake magnitude and peak horizontal ground acceleration for faults in relationship to the proposed CPU area.

Fault Name	Distance from Site (miles)	Fault Length (km)	Maximum Magnitude (Mw)	Peak Horizontal Ground Acceleration (gravity)	Estimated Modified Mercalli Intensity
Rose Canyon	0.0	70	6.7-6.9	0.37-0.56	VIII
Coronado Bank	11.9	186	7.3-7.4	0.21-0.33	VII
Newport-Inglewood (Offshore)	30.9	66	6.8-7.0	0.11-0.18	VI
Elsinore (Julian)	41.9	76	7.3-7.4	0.10-0.17	VI
Elsinore (Temecula)	42.4	52	6.9-7.1	0.09-0.15	VI
Earthquake Valley	46.6	20	6.6	0.07-0.11	VI
Elsinore (Coyote Mountain)	52.7	39	6.7-6.9	0.07-0.11	VI
Palos Verdes	55.2	99	7.2-7.3	0.08-0.13	VI
San Jacinto (Coyote Creek)	62.7	43	6.8-7.0	0.06-0.10	VI
San Joaquin Hills	64.5	27	6.9-7.1	0.07-0.12	VI
San Jacinto (Anza)	64.9	71	7.2-7.3	0.07-0.11	VI
San Jacinto (Clark)	64.9	47	6.9-7.1	0.06-0.10	VI

Source: Wilson Geosciences, Inc. 2012 (Appendix F)

As part of the geotechnical update, it was determined that the proposed CPU area could be subject to moderate ground shaking in the event of an earthquake along any of the faults listed in Table 5.4-1 or other faults in the Southern California/Northern Baja California region. This table presents a deterministic analysis ("conservative" or "worst-case") of the potential earthquake ground shaking effects from the maximum magnitude earthquakes for the faults listed. Using the Modified Mercalli Intensity (MMI) scale, a measure of the local shaking intensity of earthquakes, the table shows MMIs of VI to VIII, which range from light to moderate/heavy damage to ordinary substantial structures with strong to severe shaking. These intensities generally correspond to peak horizontal ground acceleration levels of greater than 10 percent gravity (0.1g).

Seismic/earthquake shaking risk/hazard estimates are also presented in the Geotechnical Report using a probabilistic analysis. A probabilistic analysis considers the full range of possible earthquakes; their location; and frequency of occurrence, size, and the propagation of the earthquake motion from the rupture zone to the site, thereby providing a more "realistic" evaluation. Two commonly used frequencies of occurrence for a probabilistic analysis are a 10 percent chance of being exceeded in 50 years and a 2 percent chance of being exceeded in 50 years, corresponding to earthquake return periods of 475 years and 2,475 years, respectively.

A planning level 10 percent in 50 years estimate of the peak ground accelerations and of the spectral accelerations for 0.2-second and 1.0-second frequencies (short and moderately long periods, respectively) is provided (Table 5.4-2). The values for 10 percent probability of being exceeded in 50

years were developed using the California Geological Survey estimation procedures for a “design basis earthquake” and should only be used as planning estimates, not for design.

While listing peak accelerations is useful for comparison of potential effects of fault activity in a region, local soil conditions have a strong influence on ground shaking during an earthquake due to amplification effects. Table 5.4-2 has three columns, each providing estimates for different geologic conditions based on the California Geological Survey. Each ground motion value is shown for the three possible site conditions that are found in the 2010 CBC: firm rock (conditions on the boundary between building code categories B and C), soft rock (category C), and alluvium (category D). The vast majority of the project area is artificial fill underlain by young wash, alluvial fan, and estuarine deposits that likely have a shear wave velocity equivalent to Site Class D, E, or possibly F. The remaining older alluvial and soft bedrock formations likely fall into Site Class B or C.

Ground Motion	Firm Rock	Soft Rock	Alluvium ²
Peak Ground Acceleration (in “g” force of gravity)	0.28	0.30	0.34
Spectral Acceleration ¹ (0.2 sec)	0.66	0.71	0.81
Spectral Acceleration (1.0 sec)	0.25	0.31	0.39

Source: Wilson Geosciences, Inc. 2012 (Appendix F)

¹ Spectral Acceleration = 0.2 second generally represents the natural period for short (one- to three-story) buildings, and 1.0 second for tall buildings (generally ~10 stories). Bridges are generally within the range of 0.3 to 1.2 seconds.

² Denotes the predominant earth material throughout the Project Area.

Severe ground shaking is most likely to occur during an earthquake on one of the regional active faults in the area. The Rose Canyon fault is the active fault considered having the most significant effect from a design standpoint due to its location within the proposed CPU area. Based on this analysis, damage from earthquake ground shaking could occur. The highest peak ground accelerations and MMI intensities would be produced by the Rose Canyon, Newport-Inglewood (Offshore), Elsinore (Julian and Temecula segments), and Coronado Bank faults with anticipated peak ground accelerations of 0.14g to 0.22g, and MMI intensities of VII to VIII. However, no instrumentally recorded earthquake of greater than a Richter magnitude of 6.0 has occurred within 50 miles of the project area; the 1968 Borrego Mountain earthquake on the San Jacinto-Coyote Mountain fault near Ocotillo Wells was about 69 miles away. It is estimated that this earthquake caused an MMI shaking intensity effect of IV, classified as minor shaking and no damage to structures.

Structural design in accordance with the current building code is intended to reduce the impact of earthquake shaking on buildings to an acceptable level of risk. Seismic design of future structures would be evaluated in accordance with the 2016 CBC guidelines or those currently adopted by the City of San Diego. Design in accordance with the CBC would reduce potentially significant impacts to future structures from strong seismic ground shaking to a less than significant level. SDMC Section 145.1803(a)(2) indicates that no building permit shall be issued for construction where the geotechnical investigation report establishes that construction of buildings or structures would be unsafe because of the geologic hazards. All new development and redevelopment 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).

Liquefaction-induced ground failure can involve a complex interaction among seismic, geologic, soil, topographic, and groundwater factors. Failures can include ground fissures, sand boils, ground settlement, and loss of bearing strength, buoyancy effects, ground oscillation, flow failure, and complex lateral spread landslides. The three key factors that indicate whether an area is potentially susceptible to liquefaction are the capacity for severe ground shaking, shallow groundwater, and low-density granular deposits (mainly finer grained sands). In these areas, where alluvium is sufficiently loose and groundwater is sufficiently shallow that strong earthquake shaking could cause sediments to lose bearing capacity, severe settlement of surface facilities and in some cases uplift of buried structures (e.g., large pipelines) could occur.

The City of San Diego Geologic Hazards map (City of San Diego 2008) delineates geologic units within the project area that are deemed susceptible to liquefaction (Geologic Hazard Category 31 and to a lesser extent Hazard Category 32); the high liquefaction hazard boundaries correspond to areas of artificial fill and alluvium beneath the western portion (39 percent) of the proposed CPU area. The bedrock and older alluvium areas are not considered susceptible to liquefaction. Liquefaction areas have potential land use constraints, and liquefaction assessments must be made for important projects. The depth and intensity of study will naturally vary depending on the location, type, and importance of the project.

Earthquake-induced landslides and other slope failures (e.g., rockfalls) are most typically in hillside areas with steep slopes, and in bedrock formations with clay layers and out-of-slope bedding plane dip angles. Such slope movement often occurs under static conditions with substantial rainfall. Structures, engineered slopes, roadways, utilities, and the general population located on or below these hazard areas could be subject to severe damage or injury. Slope instability under non-earthquake (static) conditions is considered to be a potentially significant hazard in the hillside and artificial cut/fill slope areas of the project area. Landslides, debris flows, and soil slips/surficial material failures affect both the area where the material originates and the down slope "runout" areas where the landslide debris accumulates. Damage to structures can be severe in either location with structures being dislocated a few to many tens of feet. Figure 2-5 shows one landslide deposit (Q1s) assumed to be within the Mission Valley Formation (Tmv) where bedrock is overlain by the Old paralic deposits (Qop6) in the northernmost portion of the proposed CPU area. Mission Valley Formation landslides may be bedding plane controlled or may break through the weaker units within the formation. Further landslides in the east one-half of the proposed CPU area may be possible; this area is in Geologic Hazard Category 53, which is level or sloping terrain with unfavorable geologic structure (i.e., out-of-slope bedding planes) of low to moderate risk.

In moderately sloping and steep hillside terrain, an appropriate engineering geology and geotechnical investigation (performed by properly licensed professionals), including field data collection, laboratory testing, and slope stability analysis, should be conducted considering both static and dynamic (earthquake) forces. Development projects within a zone susceptible to earthquake-induced landslides must be evaluated using California Geological Survey guidelines that describe study methods and mitigation options.

Building construction in accordance with the SDMC and CBC will reduce potential seismic hazards to an acceptable level of risk. Thus, while the proposed CPU area would be subject to seismic events, potential hazards associated with ground shaking and seismically induced hazards such as ground failure, liquefaction, or landslides would be reduced through implementation of site-specific geotechnical requirements associated with future development within the proposed Old Town CPU area. Therefore, impacts related to seismic hazards would be less than significant.

Issue 2 Erosion or Loss of Topsoil

Would the project result in a substantial erosion or loss of topsoil?

Due to the nature of the existing widespread development in the project area and the likely types of future development that could occur, substantial soil erosion or the loss of topsoil is not expected. The low topographic gradients, and the physical characteristics for the artificial fill (af) and surficial deposits would result in minimal erosion potential in the western portion of the proposed CPU area. The eastern portion of the proposed Old Town CPU area has steeper topography, and would therefore be more susceptible to severe erosion. Severe erosion can be minimized or prevented by implementation of standard investigation, analysis, design, and construction techniques, which are required by existing City building codes and regulations.

SDMC Section 142.0146 requires grading work to incorporate erosion and siltation control measures in accordance with Chapter 14, Article 2, Division 4 (Landscape Regulations) and the standards established in the Land Development Manual. The regulations prohibit sediment and pollutants from leaving the work site and requires the property owner to implement and maintain temporary and permanent erosion, sedimentation, and water pollution control measures. Controls shall include measures outlined in Chapter 14, Article 2, Division 2 Storm Water Runoff Control and Drainage Regulations that address the development's potential erosion and sedimentation impacts.

Conformance to such mandated City grading requirements would ensure that proposed grading and construction operations would avoid significant soil erosion impacts. Furthermore, any development involving clearing, grading, or excavation that causes soil disturbance of 1 or more acres, or any project involving less than 1 acre that is part of a larger development plan, is subject to NPDES General Construction Storm Water Permit provisions. Additionally, any development of significant size within the City would be required to prepare and comply with an approved Storm Water Pollution Prevention Plan that would consider the full range of erosion control BMPs, including any additional site-specific and seasonal conditions. Project compliance with NPDES requirements would significantly reduce the potential for substantial erosion or topsoil loss to occur in association with new development. Impacts would be less than significant.

Issue 3 Geologic Instability

Would the project be located on a geologic unit or soil that is unstable or that would become unstable as a result of the project, and potentially result in an on- or off-site landslide, lateral spreading, subsidence, liquefaction, or collapse?

The western half of the proposed CPU area is mapped as Geologic Hazard Category 31, characterized as high potential for liquefaction with shallow groundwater, major drainages, and hydraulic fills. The eastern half of the proposed CPU area is predominately mapped as Geologic Hazard Category 53, characterized as low to moderate risk with level or sloping terrain and unfavorable geologic structure. Other smaller hazard categories are mapped within the proposed CPU area with nominal risk (Geologic Hazard Category 51) and low potential for liquefaction (Geologic Hazard Category 32). The Mission Bay and Old Town fault strands (Geologic Hazard Category 12), part of the Rose Canyon fault zone, trend northwest-southeast through the center of the project area. Refer to Figure 2-6 for the location of these hazard categories.

One mapped landslide (Figure 2-5) and areas of low to moderate slope instability risk (Figure 2-6) cover 60 percent of the proposed CPU area. Natural hillsides along the eastern edge of the project area are somewhat susceptible to surficial slope failures where soils are thickest on the steeper slopes (steeper than 25 percent). Artificial fill and underlying young alluvium are susceptible to liquefaction and lateral spread landslides, as well as consolidation, settlement, and subsidence exacerbated by earthquakes, all of which can lead to damage to overlying man-made structures. Geotechnical issues related to weak soils and unstable slopes are present, but are manageable within current regulations. Only one location within the project area (< 1 percent), near the intersection of San Diego Avenue and Ampudia Street, is designated by the USGS (Morton et al, 2003) as having moderate susceptibility to soil slippage, such as surficial landslides or debris flows. Shallow subsurface water can impact shallow and deep excavations. In areas where artificial fill may have been placed without proper engineering controls and inspections (e.g., hydraulic fills), the materials may be susceptible to dynamic consolidation and subsidence. The degree of hazard for the project area is generally moderate and should be determined on a case-by-case basis if projects requiring moderate to deep excavations are proposed in the artificial fill and alluvial deposits. Large-scale subsidence due to fluid withdrawal (water or oil) is not an issue since the project area does not overlie an actively pumped groundwater aquifer or an oil field.

Future projects built in accordance with the project would be required to prepare a geotechnical investigation that specifically addresses slope stability if located on landslide-prone formations or slopes steeper than 25 percent (slope ratio of 4:1 horizontal to vertical) (SDMC Table 145.1803). Additionally, as discussed in the Geotechnical Report, the risk associated with ground subsidence hazard is low. Potential hazards associated with slope instability would be addressed by the site-specific recommendations contained within geotechnical investigations as required by the SDMC and other standards. Thus, impacts related to geologic instability would be less than significant.

Issue 4 Expansive Soils

Would the project be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial risks to life or property?

Expansive soils are found associated with soils, alluvium, and bedrock formations that contain clay minerals susceptible to expansion under wetting conditions and contraction under drying conditions. Depending upon the type and amount of clay present in a geologic unit, these volume changes (shrink and swell) can cause severe damage to slabs, foundations, and concrete flatwork. Due to the generally finer-grained nature, the artificial fill and paralic deposits (af, Qop6, and Qvop11) may be more likely to have expansive clays and are more susceptible to consolidation resulting in structure settlement. The most likely locations for collapsible soils are within the extensive artificial fill materials located predominantly in the western half of the proposed CPU area shown in Figure 2-5. Special measures would be necessary during design and construction to mitigate the effects of expansive soil.

Site-specific measures based on results of a geotechnical investigation would be necessary during design and construction of future projects to remedy the effects of expansive soil. A site-specific geotechnical investigation required for future projects within the proposed CPU area would be required by the SDMC to identify the presence of expansive soils and provide recommendations to be implemented during grading and construction to ensure that potential hazards associated with expansive soils are minimized. Thus, with implementation of the recommendations included in site-specific geotechnical investigations, potential impacts associated with expansive soils would be less than significant.

5.4.4 Significance of Impacts

5.4.4.1 Seismic Hazards

Future projects located within the proposed Old Town CPU 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 uniformly applied development policies, including existing codes and standards. This regulatory framework includes a requirement for site-specific geotechnical investigations to identify potential geologic hazards or geotechnical concerns that would need to be addressed during grading and/or construction of a specific development project. Thus, impacts would be less than significant, and no mitigation is required.

5.4.4.2 Erosion or Loss of Topsoil

SDMC Section 142.0146 requires grading work to incorporate erosion and siltation control measures in accordance with Chapter 14, Article 2, Division 4 (Landscape Regulations) and the standards established in the Land Development Manual. Conformance to such mandated City grading requirements would ensure that grading and construction operations for future projects located within the proposed CPU would avoid significant soil erosion impacts. Furthermore, any development involving clearing, grading, or excavation that causes soil disturbance of 1 or more acres, or any project involving less than 1 acre that is part of a larger development plan, is subject to NPDES General Construction Storm Water Permit provisions. Additionally, any development of significant size within the City would be required to prepare and comply with an approved Storm Water Pollution Prevention Plan that would consider the full range of

erosion control BMPs, including any additional site-specific and seasonal conditions. Thus, impacts would be less than significant, and no mitigation is required.

5.4.4.3 Geologic Instability

The risk associated with ground subsidence hazard in the proposed CPU area is low. Potential hazards associated with slope instability would be addressed by the site-specific recommendations contained within geotechnical investigations as required by the SDMC or other standards. Thus, impacts would be less than significant, and no mitigation is required.

5.4.4.4 Expansive Soils

A site-specific geotechnical investigation required for future projects within the proposed CPU area would be required by the SDMC or other standards to identify the presence of expansive soils and provide recommendations to be implemented during grading and construction to ensure that potential hazards associated with expansive soils are minimized. Thus, impacts would be less than significant, and no mitigation is required.

5.4.5 Mitigation Framework

Impacts of the project related to geologic conditions would be reduced to an acceptable level of risk with implementation of existing SDMC requirements for preparation of geotechnical investigations prior to grading and construction and implementation of applicable measures identified in project-specific geotechnical investigations. Thus, no CEQA mitigation is required and an unmitigated significant effect relative to CEQA requirements is not indicated.

This page intentionally left blank.

5.5 Noise

This section addresses the potential noise impacts that would result from the implementation of the project. It also discusses the regulations applicable to subsequent public and private projects contemplated by the project and the existing noise setting within the study area. This section is based on the Noise Analysis for the Midway – Pacific Highway and Old Town Community Plan Updates (Noise Report) prepared by AECOM (2017) for the project (Appendix G).

5.5.1 Existing Conditions

The existing regional environmental setting and regulatory framework are summarized in Chapters 2.0 and 4.0, respectively. The specific noise conditions for the proposed CPU area are discussed in the following sections.

Existing noise sources in the proposed CPU area are primarily dominated by transportation-based noise sources. Transportation noise sources include vehicular road traffic and departure of aircraft attributed to SDIA operations, as well as passenger rail and freight rail operations. Stationary noise sources include noise from typical commercial operations.

5.5.1.1 Noise Measurements

As part of the noise assessment, ambient noise levels were measured in the proposed CPU area to provide a characterization of the variability of noise throughout the proposed CPU area and to assist in determining constraints and opportunities for future development. Short-term (ST) daytime noise level measurements, each approximately 15 minutes in duration, were conducted within the proposed CPU area. The ST measurements were conducted using two Larson Davis (LD) Model LxT Sound Level Meters (serial numbers 4485 and 4486) rated by the American National Standards Institute (ANSI) as Type 1 per ANSI S1.4-1983.

Six sound level measurements were conducted in the proposed CPU area over two baseline measurement surveys on April 10 and May 23, 2017. Table 5.5-1 summarizes the measured existing noise levels at these selected locations, followed by a detailed list of measurements and observation summaries from each measurement site. Measurement locations are depicted on an aerial map in Figure 5.5-1.

Measurement OT-ST1 was conducted on the pitcher's mound of the baseball diamond on the corner of Taylor Street and Whitman Street, approximately 81 feet from the Taylor Street edge of pavement (EOP). The primary noise source at this location was vehicular traffic on I-8 and Taylor Street. Additional noise sources included fixed-wing aircraft flyovers from small propeller planes, distant train horn soundings, a distant sprinkler system operating within the Presidio Hill Golf Course, and intermittent westbound jet aircraft departures from SDIA.



Source: SANDAG 2014; City of San Diego 2017; SanGIS 2017; AECOM 2017.

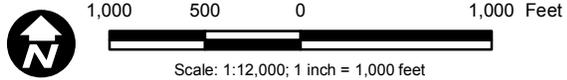


Figure 5.5-1
Noise Measurement Locations

**Table 5.5-1
Noise Measurements – Old Town**

Meas. ID	Location	Date	Start Time (hh:mm)	Duration (minutes)	L _{eq} , dBA
OT-ST1	Taylor Street and Whitman Street	4/10/17	08:45	15	62.5
OT-ST2	2606 Juan Street	4/10/17	09:07	15	61.6
OT-ST3	2495 Harney Street	4/10/17	09:28	15	70.5
OT-ST4	3999 Old Town Avenue	4/10/17	09:55	15	56.0
OT-ST5	2520 India Street	5/23/17	11:48	15	63.9
OT-ST6	3538 Hancock Street	5/23/17	11:08	15	68.2

Measurement OT-ST2 was conducted on the sidewalk adjacent to a single-family residence located at 2606 Juan Street. The primary noise source at this location was vehicular traffic on Juan Street. Additional noise sources included fixed-wing aircraft flyovers from small propeller planes, distant trolley horn soundings, intermittent westbound jet aircraft departures from SDIA, and speech from Old Town San Diego State Historic Park visitors in Parking Lot C.

Measurement OT-ST3 was conducted on the sidewalk in front of the multi-family residence located at 2495 Harney Street within a cul-de-sac, approximately 80 feet from the I-5 EOP. The primary source of noise at this location was vehicular traffic from I-5. This location has a direct line-of-sight to freeway traffic to the northwest through a chain-link fence. Additional sources included intermittent westbound jet aircraft departures from SDIA and residents entering their vehicles and driving out of the cul-de-sac.

Measurement OT-ST4 was conducted in a parking space southeast of the hillside multi-family residential structure located at 3999 Old Town Avenue. The primary source of noise at this location was intermittent birdcalls and continuous distant traffic noise from I-5. Additional noise sources included intermittent westbound jet aircraft departures from SDIA and train horn soundings.

Measurement OT-ST5 was conducted in a commercial parking lot between Ampudia Street, Moore Street, Old Town Avenue, and Jefferson Street located at 2520 India Street, approximately 225 feet from the I-5 EOP. The primary noise source at this location was vehicular traffic from I-5. Additional noise sources included distant speech, rustling leaves, vehicle movements within the parking lot, and intermittent westbound jet aircraft departures from SDIA.

Measurement OT-ST6 was conducted in a commercial parking lot located between I-5 and Pacific Highway at 3538 Hancock Street, approximately 70 feet from the Pacific Highway EOP and 100 feet from the I-5 northbound to I-8 eastbound ramp. The primary noise source at this location was vehicular traffic from I-5 and Pacific Highway. Additional noise sources included HVAC unit operation, distant speech, birdcalls, vehicle movements within the parking lot, and intermittent westbound jet aircraft departures from SDIA.

5.5.1.2 Existing Vehicle Traffic Noise

The dominant noise source in the proposed CPU area is vehicular traffic on freeways and local streets. Vehicular traffic noise is directly related to the traffic volume, speed, and mix of vehicle types. Vehicles traveling on I-5 and I-8 dominate the existing ambient environment throughout the majority of the proposed CPU area, further supplemented by main streets such as Pacific Highway and Taylor Street,

and collector streets such as Old Town Avenue, San Diego Avenue, and Juan Street. Figure 5.5-2 displays the aggregate predicted existing dBA CNEL generated by each roadway identified in the TIS (May 2017). The predicted contour locations displayed in this figure do not consider attenuation provided by existing structures, topography, or expanses of dense vegetation, and are not considered accurate for site-specific assessments. However, such contours can serve as a general guide to determine when (and where) a detailed acoustic analysis should be undertaken. As shown in the figure, existing traffic noise levels within the proposed CPU are responsible for relatively high CNEL levels when proximal to the interstates and major streets.

5.5.1.3 Existing Rail Traffic Noise

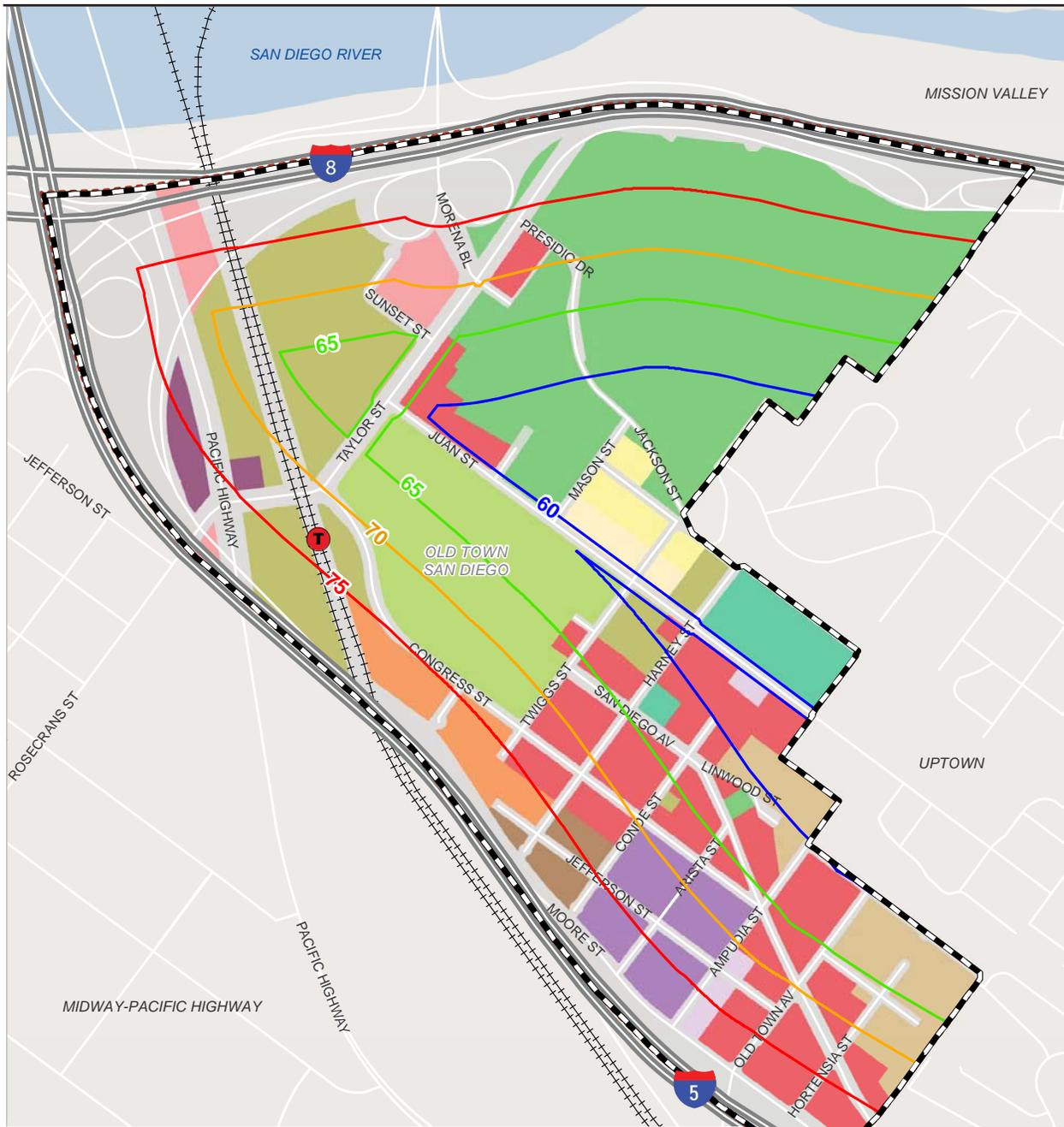
Railway noise is generated from the rail traffic on the Los Angeles-San Diego-San Luis Obispo (LOSSAN) rail corridor, consisting of freight trains (BNSF), regional and commuter passenger rail (Amtrak and NCTD Coaster), and LRT (MTS Trolley). Noise associated with these operations includes locomotive engines, wheel-to-rail and switch noise, horn sounding, station approach and disembark bell sounding, emergency signaling devices, and stationary bells associated with the at-grade crossing at Taylor Street. The rail corridor generally parallels I-5 through the proposed CPU and includes the intermodal Old Town Transit Center, a passenger rail stop serviced by all passenger and LRT trains. Light rail and passenger rail train movements occur through the proposed CPU area multiple times per hour between 4 a.m. and 1 a.m. every day. The BNSF also operates freight trains along the corridor daily, typically utilizing the rail during evening and nighttime hours. Rail traffic noise levels greater than or equal to 60 dBA L_{dn} (metric used by the Federal Railroad Administration [FRA]), extend into the proposed CPU area from the railroad alignment at a distance of approximately 182 feet.

5.5.1.4 Existing Aircraft Noise

SDIA is located south of the proposed CPU area. Flight paths for aircraft approach are occluded by terrain; however, aircraft departing westbound from SDIA can be seen and heard throughout the proposed CPU area. Aircraft noise is evaluated based on the noise contours developed by the San Diego County Regional Airport Authority and provided in the ALUCP for SDIA (San Diego County Regional Airport Authority 2014). The proposed CPU area is located outside of the 60 dB CNEL aircraft noise contour. The projected aircraft noise contours provided in the ALUCP are based on year 2030 forecasted noise exposure. Aircraft noise contours for 2035 are expected to be identical to those shown in the ALUCP, provided that no major changes occur with respect to aircraft types using SDIA, terminal capacities, or FAA flight paths and patterns.

5.5.1.5 Existing Stationary Noise

Stationary sources of noise within the proposed CPU area are characterized by specific land uses. As an example, residential areas experience noise sources from typical residential building sound sources and activities such as landscaping, operating HVAC units, children playing, dogs barking, and/or operating entertainment systems with loudspeakers. As noted in the noise survey measurement summaries, commercial land uses are also located within the proposed CPU area that include non-residential HVAC unit operation. These existing stationary noise contributors are considered typical for an urban environment that features a mixture of land use types and are not generally considered significant sources of noise. In cases of excessive noise levels or durations, the SDMC regulates noises resulting from these types of activities.



Legend

<ul style="list-style-type: none"> Community Plan Boundary Residential - Low (5-9 du/ac) Residential - Low Medium (10-15 du/ac) Residential - Medium (16-25 du/ac) Residential - Medium High (30-44 du/ac) Mixed Commercial Residential (0-25 du/ac) Mixed Commercial Residential (0-54 du/ac) Mixed Commercial Residential (0-73 du/ac) 	<ul style="list-style-type: none"> Community Commercial - Residential Prohibited Community Commercial - Residential Permitted (0-25 du/ac) Community Commercial - Residential Permitted (0-36 du/ac) Institutional Park - State Park - County Park - City 	<ul style="list-style-type: none"> Transit Center 	<p>Existing (2012) Traffic Noise</p> <ul style="list-style-type: none"> 60-65 dBA CNEL Contour 65-70 dBA CNEL Contour 70-75 dBA CNEL Contour > 75 dBA CNEL Contour
--	--	--	--

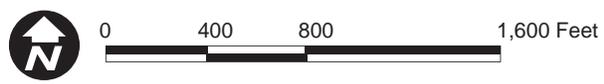


Figure 5.5-2
Existing Traffic Noise Contours

5.5.2 Significance Determination Thresholds

Thresholds used to evaluate potential noise impacts are based on applicable criteria in the CEQA Guidelines Appendix G and the City of San Diego CEQA Significance Determination Thresholds (City of San Diego 2016). Thresholds are modified from the City's CEQA Significance Determination Thresholds to reflect the programmatic analysis for the proposed CPU. A significant impact related to noise would occur if the project would:

1. Result in or create a significant increase in the existing ambient noise levels;
2. Result in an exposure of people to current or future transportation noise levels which exceed guidelines established in the Noise Element of the General Plan;
3. Result in land uses which are not compatible with aircraft noise levels as defined by an adopted Airport Land Use Compatibility Plan (ALUCP);
4. Result in the exposure of people to noise levels which exceed property line limits established in the Noise Abatement and Control Ordinance of the Municipal Code; or
5. Result in the exposure of people to significant temporary construction noise.

5.5.2.1 Noise

Thresholds used to determine the significance of noise impacts are based on standards in the City's General Plan Noise Element and the Noise Abatement and Control Ordinance (Section 59.5.0101 et seq. of SDMC) as described in the Regulatory Framework chapter, Section 4.5.2.

5.5.2.2 Vibration and Groundborne Noise

While the City has not established vibration and groundborne noise standards, publications of the Federal Transit Administration (FTA) and Caltrans provide guidance for the analysis of environmental impacts due to groundborne noise and vibration relating to transportation and construction projects. A significant vibration impact would occur where structures or human receivers would be exposed to the respective damage and annoyance thresholds, measured in PPV, listed in Table 5.5-2.

5.5.3 Methodology

5.5.3.1 Vehicle Traffic Noise

Existing (2015) and Future (2035) vehicle traffic volumes and mixes were obtained from the TIS conducted for the proposed CPU area (Chen Ryan Associates 2017; Appendix B). The traffic data and analyses in the TIS were conducted in accordance with the City of San Diego Traffic Impact Study Guidelines, SANTEC/ITE Guidelines, and the City's CEQA Significance Determination Thresholds (2016).

Table 5.5-2 Maximum Vibration Levels for Construction Equipment for Potential Damage and Annoyance (PPV in/sec)				
Structure Type	Potential Damage Thresholds		"Strongly Perceptible" Annoyance Criteria	
	Transient Sources	Continuous/Frequent Intermittent Sources	Transient Sources	Continuous/Frequent Intermittent Sources
Historic and some old buildings	0.5	0.25	0.9	0.1
Older residential structures	0.5	0.3		
New residential structures	1.0	0.5		
Modern industrial and commercial buildings	2.0	0.5		

Note: Transient sources generate a single vibratory event, such as blasting. Continuous/frequent sources include pile driving equipment and other construction activities generating multiple vibration-intensive events across a given period. in/sec = inches per second; PPV = peak particle velocity
 Source: Transportation and Construction Vibration Guidance Manual, Caltrans 2013

Traffic mix percentages for the freeways in the proposed CPU area range from 97.2 percent cars and 2.8 percent trucks along I-8, to 95.9 percent cars and 4.1 percent trucks along I-5. Per assumptions made in the TIS, local roadways were modeled with a 98 percent car and 2 percent truck traffic mix, which is generally consistent with traffic mix observations of the primary roadways during the noise survey. Detailed traffic mix and volume data inputs for each analyzed roadway segment are available in the Noise Report (AECOM 2017; Appendix G).

Predicted dBA CNEL traffic noise level distances were calculated for the existing (2015) and ~~preferred plan~~ proposed CPU (2035) conditions using the Federal Highway Administration (FHWA) Traffic Noise Model (TNM), Version 2.5, the most recent version approved for use in traffic noise assessments by the FHWA. Parameters input into the FHWA model accounted for traffic mix, vehicle speed, traffic volume, and specific roadway widths for accurate calculations of noise level distances from the roadway EOP. While the model has the capability to account for roadway gradients, and shielding effects from terrain and buildings/barriers, this analysis assumed flat topography throughout the proposed CPU area and omitted existing structures that may offer additional shielding to noise-sensitive receivers. Since these features were not included in the model input parameters, predicted noise levels presented in the analysis are likely higher than what would be measured at a location that actually benefits from noise reductions attributed to these shielding effects.

5.5.4 Impact Analysis

Issue 1 Ambient Noise

Would the project result in or create a significant increase in the existing ambient noise levels?

As discussed in Section 5.5.1.1 Noise Measurements, an existing noise measurement survey was conducted in the proposed CPU area to identify ambient noise conditions (shown in Table 5.5-1).

Existing stationary noise sources identified within the proposed CPU area were typical of a developed mixed-use neighborhood, including HVAC units in operation. Although the proposed CPU proposes the development of land uses that may ultimately generate noise during operations, operational noise levels would be required to comply with the SDMC and General Plan guidelines.

Noise from vehicular traffic is the prominent source of noise in the proposed CPU area and has greater potential to affect existing noise-sensitive receivers if annual ADT volumes increase. The freeways generating the greatest noise levels affecting the proposed CPU area are I-5 and I-8. The streets generating the greatest noise levels within the proposed CPU area are Taylor Street, Old Town Avenue, and San Diego Avenue. Vehicular traffic on roadways in the proposed CPU area would generally increase due to the future development projections of the project. Table 5.5-3 summarizes the existing and predicted ambient noise levels along various roadway segments in the proposed CPU area. Roadway noise is reported in dBA CNEL at 50 feet from the roadway EOP.

Roadway	Roadway Segment		Predicted Ambient Noise Level (dBA, CNEL @ 50 Feet from EOP)		
	From	To	Existing (2015)	Future (2035)	Change in dB
Congress St	Taylor St	Twiggs St	56	58	2
	Twiggs St	Harney St	56	58	2
	Harney St	San Diego Ave/ Ampudia St	56	58	2
San Diego Ave	Twiggs St	Harney St	54	56	2
	Harney St / Conde St	Ampudia St / Arista	56	56	0
	Ampudia St	Old Town Ave	60	60	1
	Old Town Ave	Hortensia St	57	58	1
Juan St	Taylor St	Twiggs St	59	60	1
	Twiggs St	Harney St	58	60	2
	Harney St	San Juan Rd	56	57	2
Taylor St	Pacific Hwy/ Rosecrans St	Congress St	65	66	2
	Congress St	Juan St	63	65	2
	Juan St	Morena Blvd	64	66	2
	Morena Blvd	I-8 EB Ramps	65	66	1
Twiggs St	Congress St	San Diego Ave	53	54	1
	San Diego Ave	Juan St	54	56	2
Harney St	Congress St	San Diego Ave	53	53	0
	San Diego Ave	Juan St	54	55	1
Pacific Highway	Sea World Dr	Taylor St	64	65	1
	Taylor St	Kurtz St	66	68	2
Old Town Ave	Hancock St	Moore St	61	61	0
	Moore St	San Diego Ave	58	58	0
Freeways					
Interstate 8	I-5	Morena Blvd	80	81	1
	Morena Blvd	Hotel Circle	81	82	1
Interstate 5	I-8	Old Town Ave	81	82	2
	Old Town Ave	Washington Ave	82	82	1

CNEL = Community Noise Equivalent Level; dBA = A-weighted decibel; EOP = edge of pavement

As shown in Table 5.5-3, no roadway segments generating existing noise levels greater than 65 dBA CNEL are predicted to generate an increase in noise levels greater than 3 dBA in the future condition. Additionally, no roadway segments currently generating noise levels lower than 65 dBA CNEL are predicted to increase by more than 5 dBA over existing ambient noise levels.

a. Existing Noise at Sensitive Land Uses

Ambient noise levels generated from stationary sources and vehicular traffic are not predicted to increase beyond any relevant impact threshold; thus, ambient noise level increases at existing noise-sensitive land uses would be less than significant.

b. Future Noise-Sensitive Land Uses

An existing regulatory framework and review process exists for new development in areas exposed to high levels of ambient noise. Policies in the proposed CPU and General Plan related to decibel levels, procedures in the SDMC, and regulations (Title 24) would reduce traffic noise exposure, because they set standards for the siting of sensitive land uses. Site-specific noise analyses demonstrating that the project would not subject sensitive receptors to existing or future noise levels exceeding the noise compatibility guidelines of the City's General Plan would be required as part of the review process for discretionary projects, to the extent practicable. Although no such regulations or procedures exist for future ministerial projects, impacts related to increased ambient noise levels are not predicted to occur as no roadway segments currently generating noise levels ~~lower~~ greater than 65 dBA CNEL are predicted to increase by more than ~~5-3~~ dBA over existing ambient noise levels. Thus, noise impacts applicable to new discretionary or ministerial projects would be less than significant.

Interior noise impacts for all projects, including ministerial projects, would be less than significant because applicants must demonstrate compliance with the relevant interior noise standards through submission and approval of a Title 24 Compliance Report.

Issue 2 Vehicular Noise

Would the project cause exposure of people to current or future transportation noise levels which exceed standards established in the Noise Element of the General Plan?

a. Freeway and Roadway Noise

A significant impact would occur if implementation of the project would result in an exposure of sensitive receivers to current or future motor vehicle traffic noise levels that exceed standards established in the Noise Element of the General Plan. The General Plan noise and land use compatibility guidelines are presented in Chapter 4.0, Regulatory Framework, Table 4-1. The project proposes various land uses with compatibility assessed with the following noise levels.

- Single-family residential is compatible up to 60 dBA CNEL and conditionally compatible up to 65 dBA CNEL.
- Multi-family residential and mixed uses are compatible up to 60 CNEL and conditionally compatible up to 70 CNEL.
- Additionally, as stated in Section B of the City's Noise Element, although not generally considered compatible, the City conditionally allows multi-family and mixed-use residential uses in areas experiencing up to 75 dBA CNEL from motor vehicle traffic noise with existing residential uses. Any future residential use exposed to noise levels up to 75 dBA CNEL must include attenuation

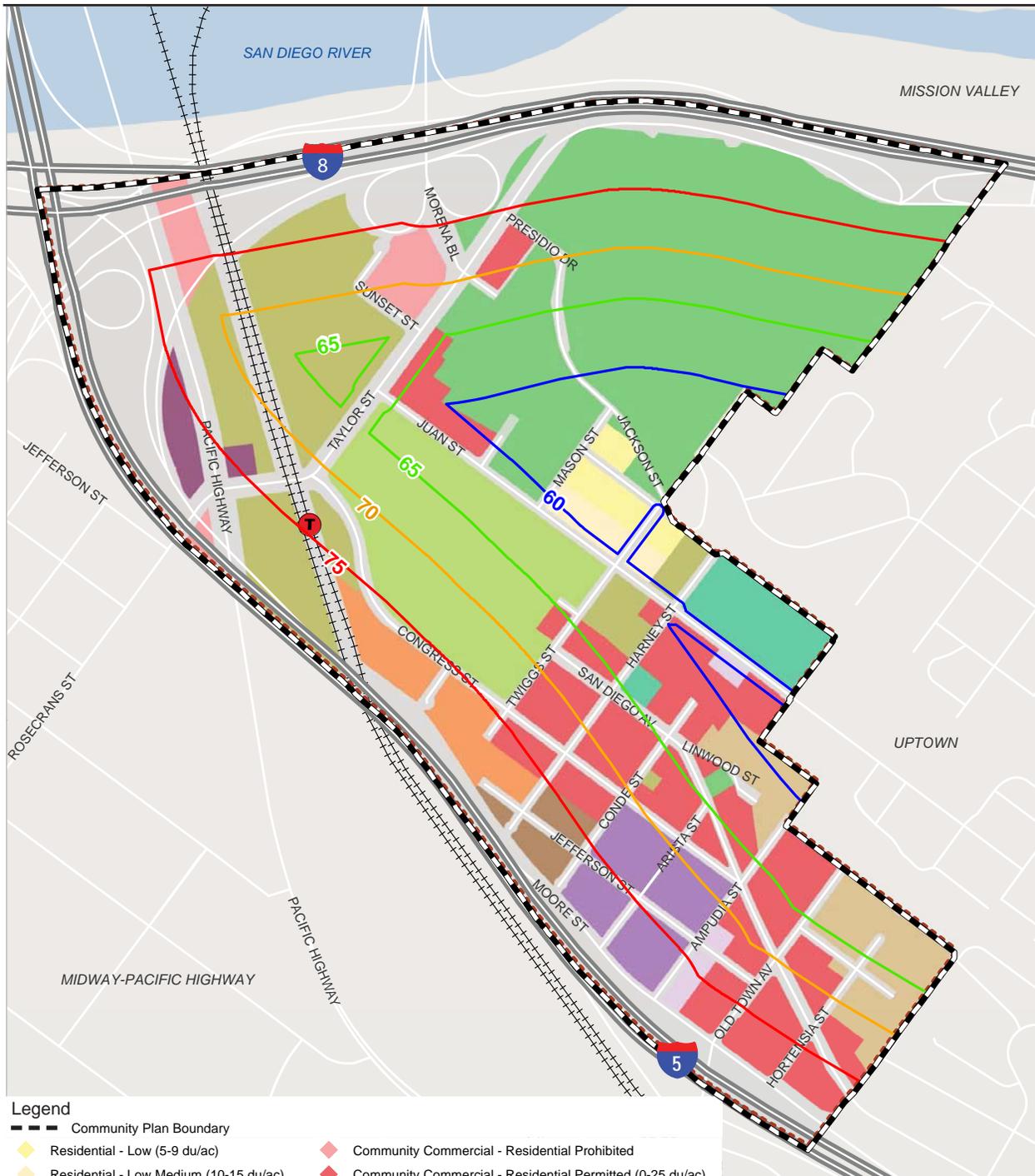
measures to ensure an interior noise level of 45 dBA CNEL and be located in an area where a community plan allows multi-family and mixed-use residential uses.

- Sales, commercial services, and office uses are compatible up to 65 dBA CNEL and conditionally compatible up to 75 dBA CNEL.
- Institutional uses are compatible up to 60 dBA CNEL and conditionally compatible up to 65 dBA CNEL
- Visitor accommodations (hotel) uses are compatible up to 60 dBA CNEL and conditionally compatible up to 75 dBA CNEL.
- Neighborhood parks are compatible up to 70 dBA CNEL and conditionally compatible up to 75 dBA CNEL.
- For new construction above 75 dBA CNEL, extensive mitigation techniques will be needed to make the indoor environment acceptable to ensure interior levels of 45 dBA CNEL are met.

The vehicle traffic from adjacent freeways is the dominant noise source affecting the proposed CPU area. The freeways generating the greatest noise levels affecting the proposed Old Town CPU area are I-5 and I-8. The streets generating the greatest noise levels within the proposed CPU area are Pacific Highway, Taylor Street, San Diego Avenue, and Old Town Avenue. The distances to the 60 dBA, 65 dBA, 70 dBA, and 75 dBA CNEL noise contours attributed to traffic volumes associated with the project are shown in Table 5.5-4. Distances to the roadway noise contours are based on an assumed hard, flat site, with no intervening barriers or obstructions. Future year noise contours for the proposed CPU area are shown in Figure 5.5-3.

At any specific noise receptor location, the actual existing noise levels would depend upon not only the source noise level, but also the nature of the sound path from the source to the sensitive receptor. In many cases, structures, terrain, dense vegetation, and other obstacles occlude the direct line-of-sight from the receptor to the traffic noise sources, which could significantly reduce noise levels received at the receptor locations. As an example, a row of buildings would reduce traffic noise levels at receptors in a subsequent row of buildings by 3 to 5 dBA depending on the building-to-gap ratio. Large continuous structures provide an even greater attenuation of traffic noise to receptors in subsequent building rows.

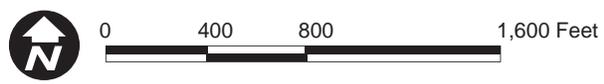
While the General Plan Noise Element has a compatibility level of 60 dBA CNEL or less for residential uses, noise levels up to 65 dBA CNEL for single-family residential and up to 70 dBA CNEL for multi-family residential are considered conditionally compatible, since interior noise levels can be reduced to 45 dBA CNEL 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 dBA CNEL in areas affected by motor vehicle traffic noise with existing residential uses. Any future residential use exposed to noise levels up to 75 dBA CNEL must include attenuation measures to ensure an interior noise level of 45 dBA CNEL and be located in an area where a community plan allows multi-family and mixed-use residential uses. Broader mitigation, such as noise walls adjacent to freeways, can also reduce received exterior noise levels to levels compliant with General Plan Noise Element guidelines. I-5 has an existing freeway noise wall from Conde Street to Harney Street, which would result



Legend

- Community Plan Boundary
- Residential - Low (5-9 du/ac)
- Residential - Low Medium (10-15 du/ac)
- Residential - Medium (16-25 du/ac)
- Residential - Medium High (30-44 du/ac)
- Mixed Commercial Residential (0-25 du/ac)
- Mixed Commercial Residential (0-54 du/ac)
- Mixed Commercial Residential (0-73 du/ac)
- Community Commercial - Residential Prohibited
- Community Commercial - Residential Permitted (0-25 du/ac)
- Community Commercial - Residential Permitted (0-36 du/ac)
- Institutional
- Park - State
- Park - County
- Park - City
- Transit Center

- Future (2035) Traffic Noise**
- 60-65 dBA CNEL Contour
 - 65-70 dBA CNEL Contour
 - 70-75 dBA CNEL Contour
 - > 75 dBA CNEL Contour



**Figure 5.5-3
Future Traffic Noise Contours**

in reduced noise levels of 5-10 dBA. Some residential land uses planned for the Old Town community would be located between the 70 and 75 dBA CNEL contours. Multi-family and mixed-use residential

**Table 5.5-4
Future Vehicle Traffic Noise CNEL Contour Distances for the
Proposed Old Town CPU Area**

Roadway	Modeled Roadway Segment		Distance to Predicted dBA CNEL (Approximate Feet from Roadway EOP)			
			75	70	65	60
	From	To				
Congress St	Taylor St	Twiggs St	<1	<1	<1	21
Congress St	Twiggs St	Harney St	<1	<1	<1	20
Congress St	Harney St	San Diego Ave/ Ampudia St	<1	<1	<1	20
San Diego Ave	Twiggs St	Harney St	<1	<1	<1	10
San Diego Ave	Harney St / Conde St	Ampudia St / Arista	<1	<1	<1	13
San Diego Ave	Ampudia St	Old Town Ave	<1	<1	8	56
San Diego Ave	Old Town Ave	Hortensia St	<1	<1	<1	21
Juan St	Taylor St	Twiggs St	<1	<1	5	47
Juan St	Twiggs St	Harney St	<1	<1	4	44
Juan St	Harney St	San Juan Rd	<1	<1	<1	20
Taylor St	Pacific Hwy/ Rosecrans St	Congress St	<1	4	79	237
Taylor St	Congress St	Juan St	<1	1	52	182
Taylor St	Juan St	Morena Blvd	<1	2	67	212
Taylor St	Morena Blvd	I-8 EB Ramps	<1	13	56	109
Twiggs St	Congress St	San Diego Ave	<1	<1	<1	3
Twiggs St	San Diego Ave	Juan St	<1	<1	<1	14
Harney St	Congress St	San Diego Ave	<1	<1	<1	<1
Harney St	San Diego Ave	Juan St	<1	<1	<1	7
Pacific Highway	Sea World Dr	Taylor St	<1	<1	52	180
Pacific Highway	Taylor St	Kurtz St	<1	16	106	281
Old Town Ave	Hancock St	Moore St	<1	<1	13	60
Old Town Ave	Moore St	San Diego Ave	<1	<1	<1	21
Freeways						
Interstate 8	I-5	Morena Blvd	256	545	785	1094
Interstate 8	Morena Blvd	Hotel Circle	297	579	824	1154
Interstate 5	I-8	Old Town Ave	333	629	891	1242
Interstate 5	Old Town Ave	Washington Ave	322	600	853	1192

uses that meet the requirements of Section B of the General Plan Noise Element would be conditionally compatible up to 75 dBA CNEL and would also be required to provide structural attenuation to reduce noise levels at interior locations.

As shown in Figure 5.5-3, future traffic noise levels with the proposed Old Town CPU at existing and proposed residential use areas would, in cases of residences close to the freeways and major roadways, exceed the General Plan Noise Element conditionally compatible thresholds for residential land uses (65 dBA CNEL for single-family and conditionally up to 75 dBA CNEL for multi-family and mixed-use developments that meet the requirements of Section B of the Noise Element). Noise levels greater than 75 dBA CNEL are considered incompatible for all land use types. Land uses located adjacent to I-5 and I-8 in the proposed Old Town CPU area and adjacent community plan areas have the potential to be exposed to noise levels greater than 75 dBA CNEL.

In the proposed Old Town CPU area, future noise levels for all land uses would be incompatible (i.e., greater than 75 dBA CNEL) at areas located within approximately 322 to 333 feet from I-5 EOP and 256 to 297 feet from I-8 EOP. Noise levels for sensitive land uses would be incompatible (i.e., greater than 70 dBA CNEL) at areas located within approximately 600 to 629 feet from I-5 and 545 to 579 feet from I-8. These areas are currently developed, and implementation of the project would result in changes to the land use in these areas, including the introduction of new noise-sensitive land uses. The development of new noise-sensitive land uses as a result of the proposed Old Town CPU may subject receptors to noise levels that exceed General Plan guidelines. Proposed development projects within these areas, such as those located in the immediate vicinity of the freeways within Hortensia, Taylor, and Residential Sub-Districts all have potential to experience CNEL levels greater than 75 dBA. Per Section B of the General Plan Noise Element, any future residential use in areas above 70 dBA CNEL must include noise attenuation measures to ensure interior levels of 45 dBA CNEL and be located in an area where a community plan allows multi-family and mixed-use residential uses. For new construction above 75 dBA CNEL, extensive mitigation techniques will be needed to make the indoor environment acceptable to ensure interior levels of 45 dBA CNEL are met.

Furthermore, policies in the proposed Old Town CPU and General Plan and CCR Title 24 would reduce traffic noise exposure, because they set standards for the siting of sensitive land uses. General Plan policy NE-A.4 requires an acoustical study consistent with Acoustical Study Guidelines (Table NE-4) for proposed developments in areas where the existing or future noise level exceeds or would exceed the “compatible” noise level thresholds as indicated on the Land Use – Noise Compatibility Guidelines. Site-specific interior noise analyses demonstrating compliance with the interior noise compatibility guidelines of the General Plan would be required for land uses located in areas where exterior noise levels exceed the noise and land use compatibility thresholds as defined in the General Plan Noise Element, Table N-3. This requirement is implemented through submission of a Title 24 Compliance Report to demonstrate interior noise levels of 45 dBA CNEL. With this framework, exterior traffic noise impacts associated with new development requiring discretionary actions and interior traffic noise impacts for both ministerial and discretionary projects would be less than significant.

However, in the case of exterior noise impacts associated with ministerial projects, there is no procedure to ensure that exterior noise is adequately attenuated. Therefore, exterior noise impacts for ministerial projects located in areas where the applicable land use and noise compatibility level is exceeded would be significant (**Impact 5.5-1**).

Impact 5.5-1: A significant impact would occur for ministerial projects exposed to vehicular traffic noise levels in excess of the compatibility levels established in the General Plan Noise Element, based on future (2035) noise contours as shown in Figure 5.5-3 of this PEIR.

b. Rail Noise

Railway noise is generated from the rail traffic on LOSSAN rail corridor, consisting of freight trains (BNSF), regional and commuter rail (Amtrak and NCTD Coaster), and LRT (MTS Trolley). Noise associated with these operations include locomotive engines, wheel-to-rail and switch noise, horn sounding, station approach and disembark bell sounding, emergency signaling devices, and stationary bells associated with the at-grade crossing at Taylor Street. The rail corridor generally parallels I-5 through the proposed CPU and includes the Old Town Transit Center, a passenger rail stop serviced by

all passenger and LRT trains. Light rail and passenger rail train movements occur through the proposed CPU area multiple times per hour except between 4 a.m. and 1 a.m. every day. BNSF also operates freight trains along the corridor daily, but typically in the evening and nighttime hours.

Operational noise associated with trolley, Amtrak, Coaster, and freight train operations was modeled using the FTA-recommended Noise Impact Assessment Spreadsheet. Modeling results are shown in Table 5.5-5. The trolleys were modeled at an operative speed of 25 mph. This is based on the distances between trolley stations and the average timing between stations obtained from published trolley schedules as reported in the Noise Technical Report for the City of San Diego Uptown Community Plan Update EIR (RECON 2016). Noise contour distances were calculated assuming no intervening buildings that would provide noise attenuation and flat-site conditions, which would represent a conservative, worst-case analysis.

Source	Distance of Predicted 60 dBA (Ldn) Noise Levels from Rail Center Alignment
MTS Trolley	38 feet
Amtrak Passenger Rail	82 feet
Coaster Passenger Rail	57 feet
Freight Rail	105 feet
Aggregate of Rail Sources	282 feet

The number of Amtrak and Coaster trains operating along the corridor was obtained from existing published schedules. There are approximately 24 Amtrak trains and 22 Coaster trains that travel on the tracks along the western boundary of the proposed Old Town CPU area daily. Amtrak trains have an average of eight cars per train and travel at a speed of 30 mph. This is based on the distances between stations and the average timing between stations obtained from published schedules as calculated in the Noise Technical Report for the City of San Diego Uptown Community Plan Update (RECON 2016). The number of cars and speed of the Coaster were assumed to be the same as the Amtrak train.

According to control point data recorded by NCTD from sample weekdays in 2016, typically four freight trains operate through the corridor each day, carrying an average of 59 cars per train. Freight train speed was modeled identical to the Amtrak and Coaster trains. Freight train activity typically occurs in the evening (7 p.m. to 10 p.m.) and nighttime (10 p.m. to 7 a.m.) hours, and was modeled assuming one train passing through during the evening time window, and the remaining three events occurring during nighttime hours.

Noise-sensitive land uses include a motel immediately abutting the railroad right-of-way.

The SANDAG is currently constructing the infrastructure to facilitate the planned 2021 start-date of the Mid-Coast Corridor Transit Project. This project will result in additional MTS Trolley service along the existing light rail corridor within the proposed Old Town CPU area. This additional service will introduce an additional 128 light rail events per day (SANDAG 2014). As shown in Table 5.5-6, the aggregate operation of existing rail uses and the anticipated Mid-Coast Corridor Transit Project Blue Line trolley will generate 60 dBA L_{dn} approximately 15 feet farther into the study area. No future change in service is expected to occur for other rail uses along the corridor.

Source	Distance of Predicted 60 dBA (Ldn) Noise Levels from Rail Center Alignment
MTS Trolley	64 feet
Amtrak Passenger Rail	82 feet
Coaster Passenger Rail	57 feet
Freight Rail	105 feet
Aggregate of Rail Sources	308 feet

The proposed CPU Noise Element contains policies to minimize excess train horn noise through the establishment of train horn “quiet zones.” Quiet zones are allowed by the federal government through implementation of safety measures to compensate for the loss of train horn usage. The proposed CPU Mobility Element support roadway-rail grade separation which would eliminate the need for bells at horns.

The nearest noise-sensitive land use is located on the west side of the railroad alignment, with motel receivers abutting the railroad right-of-way at distances as close as 80 feet from the nearest track. The nearest residential receiver is located 205 feet from the railroad right-of-way on Harney Street; however, the track at this location is on the opposing side of the elevated I-5 that, at an elevation of 20 feet, completely occludes the line-of-sight of the receivers toward the railroad. Once the railroad alignment enters the proposed Old Town CPU area from south of I-5, the nearest residential receiver is located approximately 230 feet away toward the southeast. Although these receivers are in proximity to railroad operations, Figures 5.5-2 and 5.5-3 show that vehicle traffic noise from Pacific Highway and I-5 produce CNEL noise levels from 70 to 75 dBA, 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 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.

Issue 3 Airport Compatibility

Would the project result in land uses which are not compatible with aircraft noise levels as defined by an adopted Airport Land Use Compatibility Plan (ALUCP)?

The runway for SDIA is located approximately 0.8 mile south of the proposed Old Town CPU area southern boundary. Aircraft noise is evaluated based on the noise contours developed by the San Diego County Regional Airport Authority and provided in the ALUCP for SDIA (2014).

A significant impact would occur if implementation of the project would result in land uses that are not compatible with aircraft noise levels as defined by an adopted ALUCP. As discussed in Section 5.1.3, the San Diego County Regional Airport Authority determined that the proposed CPU is conditionally consistent with the ALUCP at a programmatic level and reiterated that the City must refer future projects under the proposed CPU to the ALUC for project-level consistency determinations for those projects located within the overflight notification area. No portions of the proposed Old Town CPU are located within any of the forecasted CNEL contours presented in the ALUCP. Though aircraft departures are audible throughout the proposed Old Town CPU area, CNEL levels attributed to SDIA will not exceed 60 dBA CNEL. Neither exterior nor interior noise compatibility impacts would occur at any of the project land

uses; thus, the implementation of the project would result in a less than significant exposure to noise from aircraft.

Issue 4 Noise Ordinance Compliance

Would the project result in the exposure of people to noise levels which exceed property line limits established in the Noise Abatement and Control Ordinance of the Municipal Code?

A significant impact would occur if implementation of the project results in the exposure of people to noise levels that exceed property line limits established in the Noise Abatement and Control Ordinance of the SDMC. Stationary sources of noise include activities associated with a given land use. For example, noise sources in commercial uses would include restaurant and warehouse facility HVAC and ancillary operations, parking lots, and a variety of other uses.

Mixed-use areas would contain residential and commercial permitted developments. Mixed-use and areas where residential uses are located in proximity to commercial sites could result in an exposure of sensitive receptors to additional noise. The interface between commercial and residential uses would be exposed to noise due to operations traffic, mechanical equipment (such as generators and HVAC units), deliveries, trash-hauling activities, and customer and employee use of commercial buildings. Limiting truck idling time and enclosing external equipment (HVAC units) adjacent to residential uses would reduce stationary noise levels.

While noise-sensitive residential land uses would be exposed to noise associated with the operation of commercial uses, policies are in place to control noise and reduce noise impacts between various land uses. Noise policies are contained in the General Plan Noise Element and the proposed CPU, and regulations are included in the Noise Abatement and Control Ordinance of the SDMC. These include the requirement for noise studies, limits on hours of operation for various noise-generating activities, and standards for the compatibility of various land uses with the existing and future noise environment. In addition, enforcement of state noise regulations in Title 24 of the CCR would control impacts. Given implementation of these policies and enforcement of the Noise Abatement and Control Ordinance of the SDMC, impacts would be less than significant.

Issue 5 Temporary Construction Noise

Would the project result in the exposure of people to significant temporary construction noise?

a. Construction Noise

A significant impact would occur if implementation of the project resulted in the exposure of people to significant temporary construction noise. Future development as allowed under the project could potentially result in temporary ambient noise increase due to construction activities.

Although no specific construction or development is proposed under the project at this time, construction noise impacts could occur as future development occurs. Due to the developed nature of the proposed CPU area, there is a high likelihood that construction activities would take place adjacent to existing noise-sensitive structures.

Construction noise typically occurs intermittently and varies depending upon the phase of construction (e.g., demolition/clearing, grading and excavation, etc.), type and size of equipment being operated, and duration of construction. Typical construction noise levels are discussed in Appendix G.

Construction equipment could generate maximum noise levels (L_{max}) between 85 and 90 dBA at 50 feet from the source when operating. Hourly average noise levels would vary depending on the duration of equipment operation, type of equipment, relative location of the construction equipment to the noise-sensitive receptor, and presence of intervening barriers. As detailed in Appendix G, construction equipment predictions followed the FTA “general assessment” technique, which focuses on predicting noise emissions from the two loudest potential pieces of construction equipment from a given construction phase. Using maximum sound level (L_{max}) references and utilization factors as recommended for FTA detailed assessment, a predicted maximum hourly L_{eq} of 83.7 dBA could be achieved at 50 feet from the source. This level would attenuate to 75 dBA Hourly L_{eq} at approximately 177 feet. It should be noted, however, that the SDMC assesses construction noise via a 12-hour L_{eq} average value. Thus, if the above equipment is operating for less than 12 hours of the workday, this impact distance may be drastically shortened. Under a 12-hour operating schedule, significant impacts would occur if sensitive land uses are located within 177 feet of construction activities.

The City regulates noise associated with construction equipment and activities through its Noise Abatement and Control Ordinance, which puts limits on the days of the week and hours of operation allowed for construction. The City also imposes conditions of approval for building and grading permits related to noise. However, there is also a procedure in place that allows for a permit to deviate from the noise ordinance. Due to the developed nature of the proposed CPU area with sensitive receivers potentially located in proximity to construction sites, there is a potential for construction of future projects to expose existing residences to significant noise levels (see **Impact 5.5-2**).

Impact 5.5-2: A significant noise impact due to construction noise would occur if noise-sensitive receptors are exposed to 12-hour L_{eq} levels of 75 dBA or higher between the hours of 7 a.m. to 7 p.m., or noise generated from construction activity during nighttime hours (7 p.m. to 7 a.m.), legal holidays, or Sundays.

b. Vibration – Construction

Construction activities can generate groundborne vibration of varying degrees based on the construction activity and equipment being used. Groundborne vibration and noise associated with construction activities would only occur temporarily during groundbreaking activities such as demolition, pile driving or caisson drilling, and excavation for underground levels, and vibratory pile driving could be used to stabilize the walls of excavated areas.

Construction vibration levels during any phase may be perceptible at times. However, non-pile driving or foundation work construction phases that have the highest potential of producing vibration (such as jackhammering and other power tools) would be intermittent and would only occur for short periods of time on a given project site. By use of administrative controls, such as scheduling vibration-intensive construction activities to hours with the least potential to affect nearby properties, perceptible vibration can be kept to a minimum and, as such, would result in a less than significant impact with respect to mere perception.

Pile driving has the potential to generate the highest groundborne vibration levels and is the primary concern for vibratory structural damage when it occurs within critical distances of structures of varying age and/or construction. The Caltrans Transportation and Construction Vibration Guidance Manual (Caltrans 2013) identifies potential vibration damage thresholds for these structures as measured by PPV, in inches per second. For pile driving or other intermittent or continuous vibratory construction activities as they apply to structure types in the proposed Old Town CPU area, maximum PPV values range from 0.25 in/sec PPV for historic and certain older buildings, to 0.5 in/sec PPV for modern industrial/commercial buildings. The manual also identifies thresholds for potential human vibration annoyance from intermittent and continuous sources, which varies from “barely perceptible” at 0.01 in/sec PPV, to “severe” at 0.4 in/sec PPV. Reports of annoyance will typically occur when vibration levels reach 0.1 in/sec PPV, which is the “strongly perceptible” response level.

Vibration levels generated by pile-driving activities would vary depending on project conditions, such as soil conditions, construction methods, and equipment used. The FTA Transit Noise and Impact Assessment Manual (FTA 2006) identifies 1.518 in/sec PPV at 25 feet as the upper end of reference vibration source levels for impact pile driving equipment. Equation 10 from the Caltrans manual provides a formula for vibration attenuation through generic soil using the reference PPV level at 25 feet, and predicted receiver distance. Pile driving activities are expected to exceed threshold levels for structural damage and human annoyance, as previously reported in Table 5.5-2 of this PEIR, at the calculated receptor distances listed below in Table 5.5-7.

Structure Type	Maximum Distance (feet) for Potential Structural Damage	Maximum Distance (feet) for “Strongly Perceptible” Human Response
Historic and some old buildings	129	300
Older residential structures	109	300
New residential structures	69	300
Modern industrial and commercial buildings	69	300

Note: Structure types, damage thresholds, and human perception thresholds used in the calculation of these values are found in Tables 19 and 20 of the Caltrans Transportation and Construction Vibration Guidance Manual (Caltrans 2013). Impact pile-driving is considered “continuous/frequent intermittent” in this analysis context.

Although the mere perception of vibration is not considered a discrete impact threshold, the 300-foot perception distance above highlights potential for responses of annoyance by persons located within this proximity to pile driving activities. Additionally, pile driving within the structure-specific distances listed above has the potential to result in structural damage. Thus, implementation of future land uses under the project would have the potential to result in a significant impact related to vibration associated with construction (**Impact 5.5-3**).

Impact 5.5-3: If future pile driving occurs within the distances to structures or receivers reported in Table 5.5-7, a significant impact associated with vibration would result.

c. Vibration – Operation

Commercial operations, on occasion, utilize equipment or processes that have a potential to generate groundborne vibration. However, vibrations found to be excessive for human exposure that are the result

of commercial machinery are generally addressed from an occupational health and safety perspective. The residual vibrations are typically of such low amplitude that they quickly dissipate into the surrounding soil and are rarely perceivable at the surrounding land uses. Additionally, the commercial uses that may be constructed under the project would include uses such as retail, restaurants, and small offices that would not require heavy mechanical equipment that would generate groundborne vibration or heavy truck deliveries. Residential and civic uses do not typically generate vibration. Thus, operational vibration impacts associated with the project implementation would be less than significant.

5.5.5 Significance of Impacts

5.5.5.1 Ambient Noise

An increase in ambient vehicular traffic noise in the proposed CPU area would result from the future development projections of the project and increases in traffic due to regional growth. No significant increases in ambient noise levels were predicted to occur throughout the proposed Old Town CPU area; thus, ambient noise level increases as a result of the project would be less than significant. No mitigation is required.

5.5.5.2 Vehicular Noise

In the proposed CPU area, noise levels for all land uses would typically be incompatible (i.e., greater than 75 dBA CNEL) closest to the freeways and specific segments of Pacific Highway. These areas are currently developed and the project would change land use designations in some of these areas. While land uses in these areas would be exposed to noise levels that exceed General Plan standards, Section B of the General Plan Noise Element requires future residential uses in areas above 70 dBA CNEL to include noise attenuation measures to ensure interior levels of 45 dBA CNEL and that they be located in an area where a community plan allows multi-family and mixed-use residential uses. For new construction above 75 dBA CNEL, extensive mitigation techniques will be needed to make the indoor environment acceptable to ensure interior levels of 45 dBA CNEL. An existing regulatory framework and review process exists for new discretionary development, requiring projects to demonstrate that exterior and interior noise levels would be compatible with City standards. Noise compatibility impacts associated with future discretionary projects implemented in accordance with the project would be less than significant with implementation of existing regulations and noise standards. However, in the case of ministerial projects, there is no procedure to ensure that exterior noise is adequately attenuated. Therefore, exterior noise impacts for ministerial projects located in areas that exceed the applicable land use and noise compatibility level would be potentially significant (**Impact 5.5-1**).

Amtrak, Coaster, and freight train noise levels at the nearest planning area boundary and the nearest sensitive receptors would exceed 60 dBA L_{dn} . Although levels at these boundaries may exceed the compatibility standards of the General Plan, all sensitive receptors located within the 60 dBA L_{dn} distance buffer experience predicted existing and future traffic noise levels in excess of 70 dBA CNEL. Thus, impacts specifically from rail noise would be less than significant, and no mitigation is required.

5.5.5.3 Airport Compatibility

Based on the projected airport noise contours for SDIA, no portions of the proposed Old Town CPU area are forecasted to experience noise levels due to aircraft operations that exceed 60 dBA CNEL; therefore, impacts related to airport noise would be less than significant. No mitigation is required.

5.5.5.4 Noise Ordinance Compliance

Mixed-use sites and areas where residential uses are located in proximity to commercial sites would expose sensitive receptors to noise. Although noise-sensitive residential land uses would be exposed to noise associated with the operation of these commercial uses, City policies and regulations would control noise and reduce noise impacts between various land uses. In addition, enforcement of the state noise regulations in Title 24 of the CCR would control impacts. With implementation of these policies and enforcement of the Noise Abatement and Control Ordinance of the SDMC, impacts would be less than significant. No mitigation is required at the program level.

5.5.5.5 Temporary Construction Noise

a. Construction Noise

Construction activities related to implementation of the project would potentially generate short-term noise levels in excess of 75 dBA L_{eq} at adjacent properties. While the City regulates noise associated with construction equipment and activities through enforcement of noise ordinance standards (e.g., days of the week and hours of operation) and imposition of conditions of approval for building or grading permits, there is a procedure in place that allows for a variance to the noise ordinance. Due to the developed nature of the proposed CPU area with sensitive receivers potentially located in close proximity to any given construction site, there is a potential for construction of future projects to expose existing sensitive land uses to significant noise levels. While future development projects would be required to incorporate feasible mitigation measures, due to the proximity of sensitive receivers to potential construction sites, the program-level impact related to construction noise would be potentially significant (**Impact 5.5-2**).

b. Vibration – Construction

By use of administrative controls, such as scheduling construction activities with the highest potential to produce perceptible vibration to hours with least potential to affect nearby properties, perceptible vibration can be kept to a minimum and, as such, would result in a less than significant impact with respect to perception. However, due to the developed nature of the proposed CPU area with existing structures occupying the majority of parcels, pile driving within distances of existing structures listed in Table 5.5-7 has the potential to exceed damage thresholds and would be potentially significant (**Impact 5.5-3**).

c. Vibration – Operation

Post-construction operational vibration impacts could occur as a result of commercial operations that are implemented in accordance with the project. The commercial uses that would be constructed under the project would include uses such as retail, restaurants, and small offices that would not require heavy mechanical equipment that would generate groundborne vibration or heavy truck deliveries. Residential

and civic uses do not typically generate vibration. Thus, operational vibration impacts associated with the project would be less than significant. No mitigation is required.

5.5.6 Mitigation Framework

~~To mitigate~~ While mitigation measure **NOISE 5.5-1** would reduce potentially significant impacts that would occur ~~for~~ related to future ministerial projects exposed to vehicular traffic noise levels in excess of the compatibility levels established in the General Plan Noise Element, ~~based on Future (2035) noise contours (Impact 5.5-1)~~, the following mitigation measure would be implemented ~~infeasible as there is no procedure to ensure that an acoustical analysis would be required for ministerial projects.~~

NOISE 5.5-1: Prior to approval of ~~a development~~ any ministerial permit for any residential development proposing sensitive receptors within 900 feet of the I-5 edge-of-pavement, 900 feet of the I-8 edge-of-pavement, or adjacent to any roadway featuring ADT volumes greater than 6,000, an acoustical analysis shall be performed to determine if any required outdoor open space areas would be exposed to noise levels in excess of 65 dBA CNEL.

To mitigate impacts related to construction noise (Impact 5.5-2), the following mitigation measure would be implemented.

NOISE 5.5-2: At the project level, future discretionary projects will be required to incorporate feasible mitigation measures. Typically, noise can be controlled to comply with City standards when standard construction noise control measures are enforced at the project site and when the duration of the noise-generating construction period is limited to one construction season (typically 1 year) or less.

- Construction activities shall be limited to the hours between 7:00 a.m. and 7:00 p.m. Construction is not allowed on legal holidays as specified in Section 21.04 of the SDMC, with exception of Columbus Day and Washington's Birthday, or on Sundays (consistent with Section 59.5.0404 of the SDMC).
- Equip all internal combustion engine-driven equipment with appropriately-sized intake and/or exhaust mufflers that are properly operating and maintained consistent with manufacturer's standards.
- Stationary noise-generating equipment (e.g., compressors or generators) shall be located as far as possible from adjacent residential receivers and oriented so that emitted noise is directed away from sensitive receptors, whenever feasible.
- If levels are expected to potentially exceed SDMC thresholds, temporary noise barriers with a minimum height of 8 feet shall be located around pertinent active construction equipment or entire work areas to shield nearby sensitive receivers.
- Utilize "quiet" air compressors, generators, and other stationary noise sources where technology exists.

- The contractor shall prepare a detailed construction plan identifying the schedule for major noise-generating construction activities. The construction plan shall identify a procedure for coordination with adjacent residential land uses so that construction activities can be scheduled to minimize noise disturbance.
- Designate a "disturbance coordinator" who would be responsible for receiving and responding to any complaints about construction noise or vibration. The disturbance coordinator will determine the cause of the noise complaint and, if identified as a sound generated by construction area activities, will require that reasonable measures be implemented to correct the problem.

To mitigate impacts relative to Vibration – Construction (Impact 5.5-3), the following mitigation measure would be implemented.

NOISE 5.5-3: For discretionary projects where construction would include vibration-generating activities, such as pile driving, within the distances of specific structures listed in Table 5.5-7, site-specific vibration studies shall be conducted to ensure the development project would not adversely affect adjacent properties to the satisfaction of the Chief Building Official. Such efforts shall be conducted by a qualified structural engineer and could include:

- Identify sites that would include vibration compaction activities such as pile driving and have the potential to generate groundborne vibration and the sensitivity of nearby structures to groundborne vibration.
- Develop a vibration monitoring and construction contingency plan to identify structures where monitoring would be conducted; set up a vibration monitoring schedule; define structure-specific vibration limits; and address the need to conduct photo, elevation, and crack surveys to document before and after construction conditions. Construction contingencies would be identified for when vibration levels approach the limits.
- Monitor vibration during initial demolition activities and during pile-driving activities. Monitoring results may indicate the need for more or less intensive measurements.
- Designate a "disturbance coordinator" who would be responsible for receiving and responding to any complaints about construction vibration. The disturbance coordinator will determine the cause of the noise complaint and will require that reasonable measures be implemented to correct the problem.
- When vibration levels approach limits, suspend construction and implement contingencies to either lower vibration levels or secure the affected structures.
- Conduct post-activity survey on structures where either monitoring has indicated high levels or complaints of damage have been made. Make appropriate repairs or compensation where damage has occurred as a result of construction activities.

5.5.7 Significance of Impacts after Mitigation

~~Regarding Exterior noise impacts associated with future ministerial projects exposed to vehicular traffic noise levels in excess of the compatibility levels established in the General Plan Noise Element, based on future (2035) noise contours (**Impact 5.5-1**), future) would remain significant and unavoidable. While implementation of mitigation measure **NOISE 5.5-1** would have the potential to reduce impacts associated with ministerial projects would be required to perform, there is no procedure to ensure that an acoustical analysis as outlined in would be required for a ministerial project; therefore, the mitigation measure **NOISE 5.5-1**, which would determine is infeasible. Even if any required outdoor open space areas would be exposed to noise levels in excess of 65 dBA CNEL. Preparation of there were a procedure to require an acoustical analysis has the potential to identify potential impacts and lead to for a ministerial development, which would require the incorporation of controls to reduce traffic noise impacts on required open space areas; however, without knowing the exact spatial relationship between the open space areas and the contributing traffic noise source(s) for each future development, it is impossible to know whether every future development would be able to maintain noise levels below 65 dBA CNEL within their respective open spaces. Furthermore, if it is determined that the only feasible approach to reducing traffic noise to acceptable levels within the space would require the construction of an enclosure, such an attenuation measure may be contrary to the basic goal of creating "outdoor" open space. Thus, even within implementation of mitigation measure **NOISE 5.5-1**, traffic and vehicular exterior noise impacts associated with ministerial development would be significant and unavoidable.~~

Regarding temporary construction noise impacts (**Impact 5.5-2**), future construction projects would be required to incorporate the standard controls outlined in mitigation measure **NOISE 5.5-2**, which would reduce construction noise levels emanating from the site, limit construction hours, and minimize disruption and annoyance. With the implementation of these controls, and the limited duration of the noise-generating construction period, the substantial temporary increase in ambient noise levels would be less than significant.

Regarding vibration impacts during construction (**Impact 5.5-3**), pile driving within structure-specific distances listed in Table 5.5-7 has the potential to exceed damage and annoyance thresholds, resulting in a potentially significant impact. Implementation of mitigation measure **NOISE 5.5-3** would reduce construction-related vibration impacts; however, at the program level it cannot be known whether the measures would be adequate to minimize vibration levels to less than significant. Thus, even with implementation of mitigation measure **NOISE 5.5-3**, construction-related vibration impacts would be significant and unavoidable.

This page intentionally left blank.

5.6 Health and Safety

This section describes potential human health and public safety issues related to the presence of hazardous materials and other hazards within the proposed Old Town CPU area, identifies pertinent regulatory standards, and evaluates potential impacts and associated mitigation requirements related to implementation of the project. Ninyo & Moore conducted a California Department of Toxic Substances Control (DTSC) EnviroStor search (February 2011) for schools within the proposed Old Town CPU area. The results of that search are included in the Hazardous Materials Technical Study, Midway and Old Town Community Plan Updates, San Diego, California (HazMat Study [April 2012]), included as Appendix J of this PEIR. As the Hazardous Materials Technical Study is over five years old, AECOM reviewed DTSC's EnviroStor database and the SWRCB's GeoTracker database on September 12, 2017 to verify if any new hazardous material sites were listed. The review found no new hazardous materials sites in the proposed CPU area.

5.6.1 Existing Conditions

The existing environmental setting and regulatory framework are summarized in Chapters 2.0 and 4.0, respectively.

5.6.2 Significance Determination Thresholds

Based on the City's Significance Determination Thresholds, which have been adapted to guide a programmatic analysis of the project, a significant health and safety impact would occur if implementation of the project would:

1. Expose people or structures to a significant risk of loss, injury, or death involving wildland fires, including when wildlands are adjacent to urbanized areas or where residents are intermixed with wildlands;
2. Result in hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within a quarter-mile of an existing or proposed school;
3. Impair implementation of, or physically interfere with, an adopted emergency response plan or emergency evacuation plan;
4. Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, creates a significant hazard to the public or environment; or
5. Result in a safety hazard for people residing or working in a designated airport influence area.

5.6.3 Impact Analysis

Issue 1 ~~Wildfire Hazards~~ Wildland Fire Risk

Would the project expose people or structures to a significant risk of loss, injury, or death involving wildland fires, including when wildlands are adjacent to urbanized areas or where residences are intermixed with wildlands?

The City of San Diego receives limited precipitation; therefore, the potential for wildland fires represents a hazard, particularly on undeveloped properties or where development exists (or would potentially exist in the future) adjacent to open space or within proximity to wildland fuels. As the project would maintain natural open space within undeveloped canyons and parks, any development adjacent to this open space would be subject to a risk of fire hazards. As previously discussed in Section 2.3.6.4, much of the proposed Old Town CPU area is designated as “Very High Fire Hazard Severity Zone and 300-foot Brush Buffer” on the City Fire-Rescue Department’s Very High Fire Hazard Severity Zone Map. Existing City policies and regulations would help reduce, but not eliminate, risks from wildfires. The City’s General Plan contains goals to be implemented by the City’s Fire-Rescue Department, and sustainable development and other measures aimed at reducing the risks of wildfires.

Regulations regarding brush management are summarized in Section 4.6.3. Future development proposals 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. Impacts due to wildland fires would be less than significant.

Issue 2 ~~Schools~~ Hazardous Emissions and Materials

Would the project result in hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within a quarter-mile of an existing or proposed school?

A GeoTracker search was undertaken in March 2017 to determine what, if any, exposure to hazardous materials occurs within one-quarter-mile of existing schools. Two schools are located within the Old Town community: Early Learners Children’s Academy (Pre–K) located at 4050 Taylor Street and iHigh Virtual Academy Elementary (9–12) located at 3939 Conde Street.

The GeoTracker search identified nine open hazardous materials cleanup sites in the project area that fall within one-quarter-mile of the two Old Town community schools. Cleanup on several additional closed sites within one-quarter-mile of the schools is complete. The nine open cleanup sites include two sites within the proposed CPU area boundary, a LUST Cleanup Site undergoing a site assessment at the Old Town Shell located at 2290 Moore Street and a Military Cleanup Site undergoing remediation at the NISE-West/SPAWAR - Old Town Campus located at 4635 Pacific Highway. In addition, seven Military Cleanup Sites are undergoing site assessment at the NISE-West/SPAWAR - Old Town Campus located at 4301 Pacific Highway; however, these sites are all located west of I-5 and the railroad tracks, outside of the proposed CPU area boundary.

In accordance with City, state, and federal requirements, any new development that involves contaminated property would necessitate the cleanup and/or remediation of the property in accordance

with applicable requirements and regulations. No construction would be permitted to occur at such sites until a “no further action” clearance letter from the County DEH, or similar determination is issued by the City’s Fire-Rescue Department, DTSC, RWQCB, or other responsible agency. The current regulatory environment of City, state, and federal requirements provides a high level of protection from new hazardous uses that may be sited near schools or other sensitive receptors. Additionally, existing conditions in the proposed Old Town CPU area show no conflict between existing school sites and open hazardous materials sites. Therefore, the impact would be less than significant.

Issue 3 ~~Emergency Evacuation and Response Plans~~Plan Consistency

Would the project impair implementation of, or physically interfere with, an adopted emergency response plan or emergency evacuation plan?

There are no objectives or policies contained in the proposed Old Town CPU that would interfere with or impair implementation of an adopted emergency response or evacuation plan. The *Unified San Diego County Emergency Services Organization Operational Area Emergency Plan, Annex Q, Evacuation* (County of San Diego 2014) identifies a broad range of potential hazards and a response plan for public protection. The plan identifies major interstates and highways within the County as primary transportation routes for evacuation. The land uses identified in the proposed Old Town CPU would not physically interfere with any known adopted emergency plans. Improved roadway and transportation modifications discussed in Section 5.2, Transportation and Circulation, would directly help traffic flow and evacuation time.

The City will continue to make regular modifications to the Multi-Hazard Functional Plan and EOC as hazards, threats, population and land use, or other factors change to ensure impacts to emergency response plans are less than significant (City of San Diego 2008). Impacts to emergency response plans as a result of implementation of the project would be less than significant.

Issue 4 ~~Hazardous Materials Sites and Health Hazards~~Site

Would the project be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, creates a significant hazard to the public or environment?

Hazardous materials are typically utilized by land uses such as industrial, retail/office, commercial, residential, agriculture, medical, and recreational uses, among other activities. According to a search of federal, state, and local regulatory databases, 16 documented hazardous material release cases were identified within Old Town, four of which are open, including two permitted LUST sites (gas stations), one LUST Cleanup Site, and one Military Cleanup Site. The remaining 12 are closed cleanup program sites (Table 2-4).

Federal and state regulations require adherence to specific guidelines regarding the use, transportation, disposal, and accidental release of hazardous materials. In accordance with local, 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. No

construction would be permitted at such locations until a “no further action” clearance letter from the County DEH, or similar determination is issued by the City’s Fire-Rescue Department, DTSC, RWQCB, or other responsible agency.

In addition, as discussed in proposed Old Town CPU Policy PPF-6.1, the City would seek state and federal funding, incentives, and other assistance for hazardous materials site remediation in the community, as needed. The General Plan also includes policies to protect the health, safety, and welfare of residents relating to industrial land uses, documentation of hazardous materials investigations, and requiring soil remediation in land use changes from industrial or heavy commercial to residential or mixed residential development. Therefore, impacts related to hazardous materials sites and health hazards would be less than significant.

Issue 5 Aircraft-Related Hazards

Would the project result in a safety hazard for people residing or working in a designated airport influence area?

As concluded in Section 5.1, Land Use, of this PEIR, impacts relative to safety hazards for people residing in or working in a designated AIA would be less than significant. Additionally, there are no private heliport facilities within the proposed Old Town CPU area. Thus, impacts related to exposure of people or structures to aircraft hazards would be less than significant.

5.6.4 Significance of Impacts

5.6.4.1 Wildland Fire Risk

Existing policies and regulations would help reduce, but not completely abate, the potential risks of wildland fires. The General Plan contains goals and policies to be implemented by the City’s Fire-Rescue Department, and through land use compatibility, training, sustainable development, and other measures, these goals and policies are aimed at reducing the risk of wildland fires. Continued monitoring and updating of existing development regulations and plans also would assist in creating defensible spaces and reduce the threat of wildfires. Public education, firefighter training, and emergency operations efforts would reduce the potential impacts associated with wildfire hazards. Additionally, future development would be subject to conditions of approval that require adherence to the City’s Brush Management Regulations and requirements of the California Fire Code. As such, impacts relative to wildland fire hazard would be less than significant. No mitigation is required.

5.6.4.2 Hazardous Emissions and Materials

The project would not result in hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within a quarter-mile of any existing or proposed school. Impacts to schools would be less than significant. No mitigation is required.

5.6.4.3 Emergency Plan Consistency

The project would not impair implementation of, or physically interfere with, an adopted emergency response plan or emergency evacuation plan. Therefore, impacts would be less than significant, and no mitigation is required.

5.6.4.4 Hazardous Materials Site

Although there are closed LUST and Cleanup Program sites and two open Cleanup Program sites within the Old Town community, there are federal, state, and local regulations and programs in place that minimize the risk to sensitive receptors on or adjacent to hazardous materials sites and for hazardous materials release sites that may be encountered in the future. Adherence to these regulations would result in less than significant impacts relative to hazardous materials sites, and no mitigation is required.

5.6.4.5 Aircraft Hazards

Impacts from safety hazards related to location within an AIA would be less than significant. No mitigation is required.

5.6.5 Mitigation Framework

All impacts related to health and safety would be less than significant; thus, no mitigation is required.

This page intentionally left blank.

5.7 Hydrology/Water Quality

This section addresses the potential hydrology and surface and groundwater quality impacts that would result from the project. It relies on secondary source information and policies contained within the proposed Old Town CPU. This section also details applicable regulations, receiving waters, flood hazards, and other relevant existing conditions within the study area.

5.7.1 Existing Conditions

The existing environmental setting and regulatory framework are summarized in Chapters 2.0 and 4.0, respectively.

5.7.2 Significance Determination Thresholds

Based on the City's Significance Determination Thresholds, which have been adapted to guide a programmatic analysis of the project, a significant hydrology impact would occur if implementation of the project would:

1. Result in flooding due to an increase in impervious surfaces, changes in absorption rates, drainage patterns, or the rate of surface runoff;
2. Result in a substantial increase in pollutant discharge to receiving waters and increase discharge of identified pollutants to an already impaired water body; or
3. Deplete groundwater supplies, degrade groundwater quality, or interfere with groundwater recharge.

5.7.3 Impact Analysis

Issue 1 Flooding and Drainage Patterns

Would the project result in flooding due to an increase in impervious surfaces, changes in absorption rates, drainage patterns, or the rate of surface runoff?

The Old Town community is an urban community within the City, and the majority of the proposed CPU area is developed. Large areas of impervious surfaces (buildings, roadways, and surface parking) are mixed with a smaller amount of pervious (landscaping, parks) areas.

Future projects that could occur in the proposed CPU area ~~would~~ have the potential to result in an increase in impervious areas due to new buildings, hardscape, and parking areas. Landscaping, as well as pervious pavements used in lieu of standard pavement, diminish a project's increase in impervious areas and, therefore, diminish a project's potential increase in runoff and associated urban pollutants.

Implementation of the project would also have the potential to change surface runoff characteristics, including the volume of runoff, rate of runoff, and drainage patterns. An increase in the volume or rate of runoff or change in drainage patterns could result in flooding and/or erosion.

Future projects would be required to comply with the NPDES and Hydromodification Management Plan (HMP) requirements as described in the City of San Diego Storm Water Standards Manual. Storm water detention and HMP facilities would be implemented to accommodate the potential increase in storm water runoff rates due to the proposed increase in impervious areas. To fulfill the HMP requirements, projects would need to be designed so that runoff rates and durations are controlled to maintain or reduce pre-project downstream erosion conditions and protect stream habitat. Projects would typically manage the increase in runoff by implementing a series of storm water BMPs and detention facilities that have been specifically designed for hydromodification management. However, future development projects proposed within CPU areas draining to San Diego Bay would typically be exempt from hydromodification management requirements because of the location and hardened drainage systems. Exemptions from hydromodification management requirements shall adhere to the City's Storm Water Standards Manual. Projects discharging into underground storm drains discharging directly to bays or the ocean are exempt, subject to conditions listed in the City's Storm Water Standards Manual.

The proposed CPU elements include policies that address hydrology and water quality. The Conservation Element of the proposed CPU contains a goal related to the improvement of the hydrology and drainage within the proposed CPU area, specifically through incorporation and maintenance of LID features and storm water best management practices. The Urban Design Element contains policies recommending the incorporation of storm water management features along Taylor Street and Pacific Highway and design of parking areas to incorporate storm water management features.

All development in the City is subject to drainage regulations through the SDMC, which requires that the existing flows of a property proposed for development are maintained to ensure that the existing structures and systems handling the flows are sufficient. Since future development would be required to adhere to existing drainage regulations, development would not result in alterations to existing drainage patterns in a manner that would result in flooding or erosion on- or off-site. Adherence to the requirements of the City's Drainage Design Manual and Storm Water Standards Manual, which require installation of LID practices, such as bioretention areas, pervious pavements, cisterns, and/or rain barrels, would improve surface drainage conditions or, at a minimum, not exacerbate flooding or cause erosion. Furthermore, future development would be required to comply with NPDES permit requirements, which would result in a reduction in the volume and rate of surface runoff compared to the existing condition. The quantity of runoff reduction would depend on the actual design of open space, pervious areas, run-off retention, and the manner of implementation of these LID practices. Thus, impacts would be less than significant.

Issue 2 Water Quality

Would the project result in an increase in pollutant discharge to receiving waters and increase discharge of identified pollutants to an already impaired water body?

Future development projects that could occur in the proposed CPU area under the project would have the potential to change pollutant discharges. However, as future development in accordance with the project

occurs, applicable NPDES permit requirements would require the retention and/or treatment of storm water through the implementation of BMPs. Future development would be required to demonstrate how pollutants such as various trace metals (e.g., copper, lead, zinc, and mercury), fecal coliform, low dissolved oxygen, phosphorus, and total dissolved solids that could be associated with future development would be treated to prevent discharge into receiving waters. Much of the existing development in the area was constructed before current storm water regulations were adopted. Thus, future development and redevelopment would be subject to current, more stringent requirements, which would likely improve water quality.

Under current storm water regulations in the City, all projects requiring approvals are subject to certain minimum storm water requirements to protect water quality. Types of storm water BMPs required for new developments include site design, source control, and treatment control practices, many of which overlap with LID practices (see Section 5.4.3, Issue 2). Storm water BMPs would reduce the amount of pollutants transported from a future proposed development project to receiving waters. Subsequent projects implemented in accordance with the proposed CPU would be subject to existing regulations in place at the time projects are implemented. Thus, impacts of the project would result in a less than significant impact related to water quality.

Issue 3 Groundwater

Would the project deplete groundwater supplies, degrade groundwater quality, or interfere with ground water recharge?

Based on the Water Quality Control Plan for the San Diego Basin (September 1994), most of the groundwaters in the region have been extensively developed; the availability of potential future uses of groundwater resources is limited. Further development of groundwater resources would probably necessitate groundwater recharge programs to maintain adequate groundwater table elevations. Groundwater within the San Diego Mesa is exempt from municipal and domestic supply beneficial use, as it was determined by the 1989 Regional Water Quality Control Board's Resolution No. 89-33 that this area does not support municipal and domestic supply. Groundwater within the Mission San Diego area of the Lower San Diego portion of the San Diego Hydrologic Unit has a potential beneficial use for municipal and domestic supply and existing beneficial uses for agricultural supply, industrial service supply, and industrial process supply.

As discussed under Issues 1 and 2 above, current storm water regulations encourage infiltration of storm water runoff and protection of water quality which would also protect the quality of groundwater resources and support infiltration where appropriate. Thus, implementation of the project would result in a less than significant impact on groundwater supply and quality.

5.7.4 Significance of Impacts

5.7.4.1 Flooding and Drainage Patterns

All development is subject to drainage and floodplain regulations in the SDMC and would be required to adhere to the City's Drainage Design Manual and Storm Water Standards Manual. Therefore, with future development, the volume and rate of overall surface runoff within the proposed CPU area would be

reduced when compared to the existing condition. Impacts would be less than significant, and mitigation is not required.

5.7.4.2 Water Quality

New development under the project would be required to implement LID and storm water BMPs into project design to address the potential for transport of pollutants of concern through either retention or filtration. The implementation of LID design and storm water BMPs would reduce the amount of pollutants transported from the proposed Old Town CPU area to receiving waters. Impacts would be less than significant, and no mitigation is required.

Future development would adhere to the requirements of the MS4 permit for the San Diego Region and the City's Storm Water Standards Manual; therefore, no substantial pollutant discharges would occur and ~~there would be no~~ substantial adverse effect on water quality would result. Additionally, the City has adopted the Master Storm Water Maintenance Program to address flood control issues by cleaning and maintaining the channels to reduce the volume of pollutants that enter the receiving waters. The existing Master Storm Water System Maintenance Program will be replaced by a new Municipal Waterways Maintenance Plan which is currently undergoing environmental review. Impacts would be less than significant, and no mitigation is required.

5.7.4.3 Groundwater

Groundwater within the San Diego Mesa is exempt from municipal and domestic supply beneficial use and does not support municipal and domestic supply. Groundwater within the Mission San Diego subarea of the Lower San Diego area of the San Diego HU has a potential beneficial use for municipal and domestic supply. Storm water regulations that encourage infiltration of storm water runoff and protection of water quality would also protect the quality of groundwater resources and support infiltration where appropriate. Thus, implementation of the project would result in a less than significant impact on groundwater supply and quality. No mitigation is required.

5.7.5 Mitigation Framework

Implementation of the project would result in less than significant impacts to hydrology and water quality. No mitigation is required.

5.8 Visual Effects and Neighborhood Character

This section addresses visual effects of the project, and potential for impacts on neighborhood character, and includes a description of the built and natural visual resources within the proposed CPU area. In addition, the proposed CPU's consistency with relevant design regulations is assessed, including the adopted General Plan and the proposed CPU elements, as well as the LDC.

5.8.1 Existing Conditions

The existing environmental setting and regulatory framework are summarized in Chapters 2.0 and 4.0, respectively.

5.8.2 Significance Determination Thresholds

Thresholds used to evaluate potential impacts related to visual effects and neighborhood character are based on the City of San Diego CEQA Significance Determination Thresholds (2016). Thresholds are modified from the City's CEQA Significance Determination Thresholds to reflect the programmatic analysis for the proposed CPU. A significant impact on visual effects and neighborhood character would occur if implementation of the 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;
2. Result in a substantial adverse alteration (e.g., bulk, scale, materials or style) to the existing or planned (adopted) character of the area;
3. Result in the loss of any distinctive or landmark tree(s), or stand of mature trees as identified in the community plan;
4. Result in a substantial change in the existing landform; or
5. Create substantial light or glare which would adversely affect daytime and nighttime views in the area.

5.8.3 Impact Analysis

Potential impacts resulting from implementation of the project were evaluated based on information from existing conditions assessments of urban design, recreation, and conservation in the proposed CPU area. The assessment was made using data from observation, spatial analysis, and a photographic inventory.

Issue 1 Scenic Vistas or Views

Would the project result in a substantial obstruction of a vista or scenic view from a public viewing area as identified in the community plan?

The proposed Old Town CPU does not identify any specific existing scenic views or vistas within the Old Town community. The Land Use Element of the proposed CPU does, however, describe a vision for enhancements to the Presidio Park area, which includes scenic overlooks or viewpoints to San Diego Bay, Mission Bay, and the San Diego River.

Due to the urbanized nature of the proposed CPU area, future projects would blend with the existing urban framework through proposed design elements stated within the Urban Design Element of the proposed CPU, and would not result in new obstructions to view corridors along public streets where view opportunities largely exist.

No Officially Designated State Scenic Highway runs through the Old Town community. Thus, no impacts to an Officially Designated State Scenic Highway would result from the project.

Implementation of the proposed CPU would not result in a substantial alteration or blockage of public views from critical view corridors, designated open space areas, public roads, or public parks; new development within the community would take place within the constraints of the existing urban framework and development pattern, as well as design guidelines in the proposed CPU. Thus, future development would not impact view corridors or viewsheds as viewed from identified public vantage points. Public view impacts would be less than significant.

Issue 2 Neighborhood Character

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

Old Town is a developed, urbanized community with some open and park space and a designated State Historic Park. The guiding principles of the proposed CPU aim to maintain Old Town with its existing character as a residential community, as well as a visitor attraction, with buildings that replicate, retain, and enhance the distinctive character that existed in Old Town prior to 1871. Residential buildings that complement Old Town's historical small town character and implement the architectural styles policies in the proposed CPU's Urban Design Element could replace out-of-scale non-historic buildings such as those found in the Hortensia Sub-District. The proposed Old Town CPU Urban Design Element includes building design guidelines for architectural criteria, architectural periods, and sustainability that address building height, further protecting public view corridors and regulating the bulk and scale of development. In keeping with the existing community character, buildings would be limited to one to three stories in height. Additionally, there is the opportunity to build shopkeeper quarters, primarily in the Core and Hortensia Sub-Districts, that can provide small business owners and artists with the ability to live and work in the same location. Commercial development is encouraged in both stand-alone buildings, as well as mixed-use parcels. Policies and visions for the individual sub-districts of the Old Town community are stated in Section 3, Land Use, in the proposed CPU.

Future development projects would be undertaken in accordance with the City's General Plan and LDC (including the Old Town Planned District Ordinance) in addition to proposed Old Town CPU policies. The proposed Old Town CPU includes Urban Design Element policies intended to direct future development in a manner that ensures that the physical attributes of the Old Town community will be retained and enhanced by architectural and site design that responds to the community's particular historical context while providing potential for growth.

The proposed Urban Design Element provides policies relative to streetscape (publicly owned street rights-of-way) and public spaces (publicly accessible open spaces such as parks, squares, plazas, courtyards, and alleys) that would reinforce the area's historic character and function as future development occurs. Proposed streetscape policies would address the siting of street furnishings, design character, and provision of plazas and pedestrian nodes to enhance the pedestrian realm. Urban forestry policies are also proposed that would maximize the benefits of trees, including their contribution to the character, identity, and comfort of the community's streets. Trees also contribute to the spatial definition of a street, providing both a comfortable sense of scale and enclosure to the public realm. They may add shade, which contributes to pedestrian comfort, and color, texture, and pattern that contribute to the street's visual quality. Tree and shrub species and herbaceous plant species palettes, which are included in the proposed Old Town CPU and Planned District Ordinance, have been designed to utilize plant and tree species that are native to San Diego County and that can contribute to the visual character of Old Town.

The Urban Design Element of the proposed Old Town CPU would also provide policies addressing commercial and mixed-use development, and residential in-fill development. Policies are related to street wall articulation, ground-level uses, windows, building materials, lighting, signs, corners, architectural projections, rooftop and mechanical screening, public space, public art, street orientation and setbacks, sustainable building design, height and massing, and development transitions. Implementation of these policies would provide specific policy support to ensure that the bulk and scale of development is not out of character with the existing environment.

With the implementation of the proposed Urban Design Element policies, zoning, and LDC regulations, new development would be consistent with the existing neighborhood character. Thus, impacts related to substantial alterations to the existing or planned character of the area would be less than significant.

Issue 3 Distinctive or Landmark Trees

Would the project result in the loss of any distinctive or landmark tree(s), or stand of mature trees as identified in the community plan?

Because the proposed Old Town CPU is an adoption of a plan, development would occur in the future over an extended time period, and potential loss of any distinctive, landmark, or mature trees with future development is presently unknown. The proposed Old Town CPU's Urban Design Element includes a policy to preserve existing mature trees whenever possible, including non-native trees, and the Conservation Element includes a policy to design and construct development to retain significant, mature, and healthy trees as feasible. In addition, street trees present within the proposed Old Town CPU area are subject to City Council Policy 900-19, which provides for protection of street trees, except as required because of tree health or public safety. The proposed Old Town CPU Urban Design Element, Section 5.6,

also includes Urban Forestry policies that would promote the planting of new trees, and would provide guidance as to the types of trees that should be planted. Thus, implementation of the project would result in a less than significant impact related to losses of distinctive or landmark trees or mature stands of trees.

Issue 4 Landform Alteration

Would the project result in a substantial change in the existing landform?

It is not anticipated that future development allowed by the project would result in significant landform alteration. As discussed previously, the community is largely developed with existing urban land uses. While the proposed Old Town CPU would intensify some uses, the proposed CPU contains policies to ensure that redevelopment takes into account existing development as well as the landform. Of particular importance are the proposed Old Town CPU Conservation Element and Urban Design Element policies that would support conservation of existing landforms and open space and would support the design of buildings that respects existing landforms.

Because the proposed Old Town CPU is an adoption of a plan, development would occur in the future over an extended time period, and specific grading quantities associated with future development are presently unknown. However, no mass grading is anticipated since the proposed Old Town CPU area is already nearly fully developed with urban uses, or is protected as a historic resource. As future development proposals come forward resulting from the project, they would be reviewed to determine whether grading plans demonstrate compliance with the City's LDC for grading and if a permit is needed, or if the development proposal is exempt from a grading permit per the LDC (i.e., excavation). Therefore, impacts to the landform from future development resulting from the project would be less than significant.

Issue 5 Light and Glare

Would the project create substantial light or glare which would adversely affect daytime or nighttime views in the area?

The Old Town community has a mixture of commercial, residential, and institutional uses, as well as park space. Sources of light currently include those typical of an urban community, such as building lighting for residential and nonresidential land uses, roadway infrastructure lighting, and signage. Future development implemented in accordance with the project would necessitate the use of additional light fixtures and may contribute to existing conditions of light and glare. New light sources may include residential and non-residential interior and exterior lighting, parking lot lighting, commercial signage lighting, and lamps for streetscape and public recreational areas.

Lighting policies within the proposed Old Town CPU Urban Design Element would support pedestrian-oriented street lighting with appropriate shielding and low heights to minimize light spillage. These policies would support existing lighting regulations in the LDC. Outdoor lighting is regulated by Section 142.0740 of the LDC. The purpose of the City's outdoor lighting regulations is to minimize negative impacts from light pollution, including light trespass, glare, and urban sky glow in order to preserve enjoyment of the night sky and minimize conflict caused by unnecessary illumination. Regulation of outdoor lighting is also intended to promote lighting design that provides for public safety and conserves electrical energy. New

outdoor lighting fixtures must minimize light trespass in accordance with the Green Building Regulations, where applicable, or otherwise shall direct, shield, and control light to keep it from falling onto surrounding properties. The regulations prohibit direct-beam illumination from leaving the premises and requires that most outdoor lighting be turned off between 11:00p.m. and 6:00 a.m. with some exceptions (such as lighting provided for commercial and industrial uses that continue to be fully operational after 11:00 p.m.).

Section 142.0730 of the City's LDC regulates glare. Section 142.0730 limits a maximum of 50 percent of the exterior of a building to be composed of reflective material that has a light reflectivity factor greater than 30 percent. Additionally, per Section 142.0730(b), reflective building materials are not permitted where the City Manager determines that their use would contribute to potential traffic hazards, diminished quality of riparian habitat, or reduced enjoyment of public open space. Lighting impacts to MHPA areas that occur within the Old Town community (within the canyon areas) would be regulated through compliance with MHPA Land Use Adjacency Guidelines, which require lighting of all developed areas adjacent to the MHPA to be directed away from the MHPA. With requisite implementation of both the proposed Old Town CPU and General Plan/LDC regulations, as well as requirement of the MHPA Land Use Adjacency Guidelines, lighting and glare impacts would be less than significant.

5.8.4 Significance of Impacts

5.8.4.1 Scenic Vistas or Views

Implementation of the project would not result in substantial alteration or blockage of public views from critical view corridors, designated open space areas, public roads, or public parks; new development within the community would take place within the constraints of the existing urban framework and development pattern, thereby not impacting public view corridors and viewsheds along public rights-of-way. Therefore, public view impacts would be less than significant, and no mitigation is required.

No Officially Designated State Scenic Highways occur in the vicinity of the proposed CPU area. Impacts would be less than significant, and no mitigation is required.

5.8.4.2 Neighborhood Character

The proposed Old Town CPU includes policies that would encourage residential, commercial, and mixed-use development that would be consistent with the existing neighborhood character, and impacts would be less than significant. No mitigation is required.

5.8.4.3 Distinctive or Landmark Trees

Implementation of the proposed Old Town CPU would prevent the loss of existing mature trees except as required because of tree health or public safety. The implementation of the project would not result in the loss of any distinctive or landmark trees, or any stand of mature trees; therefore, ~~no~~ impacts would ~~result~~ be less than significant. No mitigation is required.

5.8.4.4 Landform Alteration

Implementation of the project would result in less than significant impacts related to landform alteration based on implementation of proposed Old Town CPU policies that require building form to be sensitive to topography and slopes, and existing protections for steep slopes (ESL) and grading regulations within the LDC. Thus, impacts related to landform alteration would be less than significant, and no mitigation is required.

5.8.4.5 Light and Glare

Impacts relative to lighting and glare would be less than significant through the implementation of existing requirements as well as policies in the proposed CPU. No mitigation is required.

5.8.5 Mitigation Framework

Potential impacts on visual effects and neighborhood character resulting from implementation of the project would be less than significant. Thus, no mitigation is required.

5.9 Air Quality

This section addresses the potential air quality impacts that would result from implementation of the project. This section is based on the Air Quality Technical Study for the Old Town Community Plan Update (Air Quality Report) prepared by AECOM (2017) for the project (Appendix H).

5.9.1 Existing Conditions

The existing environmental setting and regulatory framework are summarized in Chapters 2.0 and 4.0, respectively.

5.9.2 Significance Determination Thresholds

5.9.2.1 CEQA Guidelines

Thresholds used to evaluate potential impacts to air quality are based on applicable criteria in the CEQA Guidelines Appendix G and the City of San Diego Significance Determination Thresholds (2016), and applicable air district standards described below. A significant impact could occur if implementation of the project would:

1. Conflict or obstruct the implementation of the applicable air quality plan;
2. Result in a violation of any air quality standard or contribute substantially to an existing or projected air quality violation;
3. Expose sensitive receptors to substantial pollutant concentrations, including toxic air contaminants; or
4. Create objectionable odors affecting a substantial number of people;

5.9.2.2 San Diego Air Pollution Control District

a. Conflict with Air Quality Plan

Regarding Issue 1 above, the federal Clean Air Act and the California Clean Air Act require that air basins designated nonattainment for criteria pollutants prepare and implement plans to attain the standards. At the time of this analysis, the air quality plans for the SDAB include the CO maintenance plan, the federal 2012 maintenance plan for ozone NAAQS, and the RAQS. The two pollutants addressed in the RAQS are volatile organic compounds (VOC) and oxides of nitrogen (NO_x), which are precursors to the formation of ozone. Projected increases in motor vehicle usage, population, and industrial growth create challenges in controlling emissions to maintain and further improve air quality. The RAQS, in conjunction with the Transportation Control Measures, were most recently revised in December 2016.

The basis for the mobile source emission estimates in the RAQS is the distribution of population in the region as projected by SANDAG. The San Diego APCD refers to approved general plans to forecast, inventory, and allocate regional emissions from land use and development-related sources. These emissions budgets are used in statewide air quality attainment planning efforts. As such, projects that are consistent with the General Plan and the assumptions used in the development of the RAQS would not conflict with or obstruct attainment of the air quality levels, which would help the region achieve ambient air quality standards. Projects that propose development at an intensity equal to or less than population growth projections and land use intensity are inherently consistent. However, projects that amend or propose development greater than the projections in the RAQS would not necessarily result in an inconsistency with the air quality plan. Since the focus of the RAQS is on emissions, amending the adopted Community Plan (1987) to change land use development would require further analysis to determine consistency with RAQS and the SIP.

b. Air Quality Standards

Regarding Issue 2 above, the San Diego APCD has established trigger levels that determine when a new or modified stationary source would require an air quality analysis. These trigger levels are utilized by the City of San Diego in their Significance Determination Thresholds (City of San Diego 2016) as one of the considerations when determining the potential significance of air quality impacts for projects within the City. These thresholds would be applicable to future, individual development projects implemented within the proposed CPU area. The air quality impact screening levels applicable to future development within the proposed CPU area are shown in Table 5.9-1.

	Emission Rate		
	Pounds/Hour	Pounds/Day	Tons/Year
NO _x	25	250	40
SO _x	25	250	40
CO	100	550	100
PM ₁₀	--	100	15
Lead	--	3.2	0.6
VOC, ROG ¹	--	137 ²	15
PM _{2.5}	--	100 ³	--

Source: APCD, Rule 20.2 (12/17/1998); City of San Diego 2016

NO_x = oxides of nitrogen, SO_x = oxides of sulfur, CO = carbon monoxide, PM₁₀ = particulate matter less than 10 micrometers in diameter, PM_{2.5} = particulate matter less than 2.5 micrometers in diameter, VOC/ROG = volatile organic compounds/reactive organic gases.

Notes:

¹ The terms ROG and VOC are essentially synonymous and are used interchangeably.

² VOC thresholds are based on levels per the South Coast Air Quality Management District (SCAQMD) and Monterey Bay Air Pollution Control District, which have similar federal and state attainment status as San Diego.

³ PM_{2.5} threshold developed from the SCAQMD *Final Methodology to Calculate PM_{2.5} and PM_{2.5} Significance Thresholds* (SCAQMD 2006) and the PM₁₀ standard of the San Diego APCD.

The project level thresholds are intended to ensure many individual projects would not obstruct the timely attainment of the NAAQS and CAAQS. However, the above thresholds are applicable to individual development projects and not a program level analysis such as the proposed CPU. Generally, discretionary program-level planning activities, such as general plans, community plans, and specific

plans, are evaluated for consistency with the local air quality plans as a measure of significance. However, for a conservative analysis, the net change in emissions ~~from~~ between the adopted Community Plan and the proposed CPU is compared to the thresholds of significance.

c. Substantial Pollutant Concentrations

1. Localized Carbon Monoxide Hot Spots Impacts

Although the SDAB is currently an attainment/maintenance area for CO, exhaust emissions can potentially cause a direct, localized “hotspot” impact at or near proposed development. Because increased CO concentrations are usually associated with roadways that are congested and with heavy traffic volumes, many agencies have established preliminary screening criteria to determine with fair certainty that, if not violated, project-generated, long-term operational local mobile-source emissions of CO would not result in, or substantially contribute to, emissions concentrations that exceed the 1-hour ambient air quality standard of 20 parts per million (ppm) or the 8-hour standard of 9.0 ppm.

The City of San Diego has developed screening thresholds to analyze the potential impacts to the localized effect of CO. A project resulting in longer queues at traffic signals could cause a potential localized significant air quality impact if a proposed development causes a four- or six-lane road to deteriorate to LOS E or worse. The TIS analyzed LOS for the project (Chen Ryan Associates 2017; Appendix B).

2. Toxic Air Contaminants

For San Diego APCD permitted stationary projects, the APCD does not identify a significant impact if the potential health risks from the project would not exceed the health risk public notification thresholds specified by San Diego APCD Rule 1210.

For operational impacts, the analysis considers whether the proposed CPU would be consistent with the siting distances recommended by CARB’s Air Quality and Land Use Handbook: A Community Health Perspective, which provides guidance on land use compatibility with sources of TACs (CARB 2005). The handbook is not a law or adopted policy but offers advisory recommendations for the siting of sensitive receptors near uses associated with TACs, such as freeways and high-traffic roads, commercial distribution centers, rail yards, ports, refineries, dry cleaners, gasoline stations, and industrial facilities, to help protect children and other sensitive members of the population.

d. Odors

Regarding Issue 4 above, two situations increase the potential for odor problems. The first occurs when a new odor source is located near existing receptors. The second occurs when new receptors are developed near existing sources of odor. San Diego APCD Rule 51 (Nuisance) prohibits the emission of any material which causes nuisance to a considerable number of persons or endangers the comfort, health, or safety of the public. Projects required to obtain permits from APCD, typically industrial and some commercial projects, are evaluated by APCD staff for potential odor nuisance and conditions, where necessary, to prevent occurrence of public nuisance.

The occurrence and severity of odor impacts depend on numerous factors, including the nature, frequency, and intensity of the source; wind speed and direction; and the presence of sensitive receptors. While offensive odors rarely cause any physical harm, they still can be very unpleasant, leading to considerable distress and often generating citizen complaints to local governments and regulatory agencies.

5.9.3 Impact Analysis

Issue 1 Conflict with Air Quality Plan

Would the project conflict with or obstruct implementation of the applicable air quality plan?

Projects that are consistent with the assumptions and emission forecasts used in development of the applicable air quality plan are considered to not conflict with or obstruct the attainment of the air quality levels identified in the plan. Emission forecasts rely on projections of VMT by the Metropolitan Planning Organizations, such as SANDAG, and population, employment, and land use projections made by local jurisdictions during development of the area and general plans. While the RAQS acknowledges mobile and area sources, minor changes in the assumptions relative to these sources would not obstruct successful implementation of the strategies for improvement of SDAB's air quality. ~~The project would change the planned land use mix as follows:~~

- ~~• Increase the projected number of multi-family residential units by approximately 26 percent;~~
- ~~• Decrease the projected number of single-family residential units by approximately 35 percent;~~
- ~~• Increase the amount of land designated for commercial development by 11 percent; and~~
- ~~• Decrease the amount of land designated for institutional development by 48 percent.~~

The consistency with the RAQS is further evaluated by comparing emissions that would occur under build-out of the adopted Community Plan to the emissions that would occur under the project.

As presented below in Tables 5.9-2 and 5.9-3, construction and operational emissions under the project would result in a slight increase compared to future operational emissions for all pollutants ~~except VOC~~ under the adopted Community Plan. However, the net increase from the adopted Community Plan would not exceed any of the significance thresholds presented in Table 5.9-1 above. Therefore, the proposed CPU would be consistent with the growth projections and emission forecasts used in the RAQS.

In addition, the General Plan and Community Plan work together to establish the policy framework for growth and development in the proposed CPU area, and the proposed CPU would build upon the goals and strategies in the General Plan. The proposed CPU is intended to further express General Plan policies through the provision of site-specific recommendations and policies that implement Citywide goals and policies at the Community Plan-level, address community needs, and guide zoning.

Thus, because the proposed CPU would be consistent with the General Plan and the land use changes associated with the project would not result in a significant increase in operational emissions, the project would be consistent with assumptions contained in the RAQS, and impacts would be less than significant.

Issue 2 Air Quality Standards

Would the project result in a violation of any air quality standard or contribute substantially to an existing or projected air quality violation?

Air quality impacts can result from the construction and operation of a project. Construction impacts are short-term and result from fugitive dust, equipment exhaust, and indirect effects associated with construction workers and deliveries. Operational impacts can occur on two levels: regional impacts resulting from development or local effects stemming from sensitive receivers being placed close to roadways or stationary sources. In the case of the project, operational impacts are primarily due to emissions from area and mobile sources associated with activities such as natural gas combustion for space and water heating and vehicular travel along roadways. Construction and operational impacts of the project are discussed below.

a. Construction

Construction-related activities are temporary, short-term sources of air emissions. Sources of construction-related air emissions include:

- Fugitive dust from grading activities;
- Construction equipment exhaust;
- Construction-related trips by workers, delivery trucks, and material-hauling trucks; and
- Construction-related power consumption.

The intensity of construction activity associated with the proposed CPU could be the same during each year. It is more likely, however, that some period of construction (and associated emissions) would be more intense than other periods due to changes in market conditions and according to the preferences of the project applicants. As explained previously, the levels identified in the City of San Diego Significance Determination Thresholds are applicable to future, individual development projects and not a program level analysis. While neither the San Diego APCD nor the City of San Diego provides additional guidance on construction assumptions for plan level analyses, some air districts such as the Sacramento Metropolitan Air Quality Management District (SMAQMD) suggest that lead agencies conservatively assume that construction-generated emissions associated with the a plan should be evaluated assuming 25 percent of the total land uses would be constructed in a single year (SMAQMD 2016). Therefore, in order to illustrate the potential construction-related air quality impacts from projects that could occur under the proposed Old Town CPU, a conservative approach using the methodology recommended by the SMAQMD was used. Similar to evaluating construction emissions associated with an individual project, the maximum daily construction-generated emissions were then compared to the thresholds of significance.

The proposed land uses in 2035 of the proposed Old Town CPU and the adopted Community Plan were compared to the existing land uses to determine the total land use that would be constructed over the life of the ~~plan~~plans. Assuming 25 percent of those total land uses would be constructed in a single year under the proposed Old Town CPU results in construction of 32,545 square feet of commercial land uses, approximately 0.95-acre (43237 dwelling units) of multi-family residential land uses, and ~~48,307~~16,300 square feet hotel land uses. The analysis also assumed 25 percent reduction in other land uses (e.g.,

institutional, military, and tourist attraction office) would occur via demolition in the same year. As the proposed Old Town CPU provides a long-range guide for the future physical development of the community through 2035, assuming 25 percent of total land uses would be constructed in a single year is a conservative approach. The 25 percent of the total land uses under the adopted Community Plan would consist of approximately 22,795 square feet of commercial land uses, 24,194 square feet of hotel land uses, 503 square feet of institutional land uses, 0.58-acre (18 dwelling units) of multi-family residential land uses, and approximately 0.36-acre (7 dwelling units) of single family residential land uses.

Criteria air pollutant emissions were calculated using California Emissions Estimator Model (CalEEMod) version 2016.3.1. CalEEMod is a tool used to estimate air emissions resulting from land development projects based on California specific emission factors. CalEEMod includes default estimates on the required construction equipment, phases, and activities when project specific information is unavailable. The default estimates are based on surveys of typical construction projects which provide a basis for scaling equipment needs and schedule with a project's size. Emission estimates in CalEEMod are based on the duration of construction phases; construction equipment type, quantity, and usage; grading area; season; and ambient temperature, among other parameters.

Given that exhaust emissions from the construction equipment fleet are expected to decrease over time as stricter standards take effect, construction emissions were conservatively modeled to occur in 2018. As construction occurs in later years, advancements in engine technology, retrofits, and turnover in the equipment fleet are anticipated to result in lower levels of emissions. The analysis assumed that standard dust and emission control during grading operations would be implemented to reduce potential nuisance impacts and to ensure compliance with San Diego APCD Rule 50 (Visible Emissions), Rule 51 (Nuisance), and Rule 55 (Fugitive Dust Control). An architectural coating VOC limit of 50 grams per liter was used for residential interior coatings to reflect the requirements of San Diego APCD, Rule 67 (Architectural Coatings).

A summary of the modeling results is shown in Table 5.9-2. Additional modeling details are shown in Appendix H.

Pollutant	VOC	NO _x	CO	SO ₂	PM ₁₀	PM _{2.5}
<u>Adopted Community Plan</u>	<u>16.57</u>	<u>110.72</u>	<u>70.77</u>	<u>0.12</u>	<u>10.23</u>	<u>7.24</u>
<u>2018 Project</u>	<u>49.53</u>	<u>2165.63</u>	<u>58.51</u>	<u>0.419</u>	<u>44.21</u>	<u>22.46</u>
<u>Net Change</u>	<u>16.38</u>	<u>54.91</u>	<u>35.52</u>	<u>0.07</u>	<u>12.24</u>	<u>7.55</u>
Threshold of Significance ¹	137	250	550	250	100	100
Exceed Threshold?	NO	NO	NO	NO	NO	NO

Source: ¹City of San Diego 2016. Estimated by AECOM in 2017/2018.

Notes: NO_x = oxides of nitrogen, SO_x = oxides of sulfur, CO = carbon monoxide, PM₁₀ = particulate matter less than 10 micrometers in diameter, PM_{2.5} = particulate matter less than 2.5 micrometers in diameter, VOC/ROG = volatile organic compounds/reactive organic gases.

Emissions summarized in Table 5.9-2 are the maximum daily emissions for each pollutant across different phases of construction. Although construction phases would not necessarily occur simultaneously, overlapping construction activities could result in the worst-case daily emissions. As shown in Table 5.9-2, construction of 25 percent of total build-out in a single year would not exceed the applicable thresholds. Additionally, the regulations at the federal, state, and local levels provide a framework for developing project-level air quality protection measures for future discretionary projects. The City's process for the evaluation of discretionary projects includes environmental review and documentation pursuant to CEQA, as well as an analysis of those projects for consistency with the goals, policies and recommendations of the General Plan. Ministerial projects would not require a formal environmental review. Generally, ministerial permits require a public official to determine only that the project conforms to applicable zoning and building code requirements, and that applicable fees have been paid. Ministerial projects are generally smaller in size than those requiring discretionary review and construction would be less intensive than the scenario evaluated in this analysis. As such and as shown in Table 5.9-2, construction related air quality impacts would be less than significant.

b. Operation

Operational emissions may be both direct and indirect emissions, and would be generated by mobile and area sources. Sources of operational emissions associated with future projects developed under the proposed Old Town CPU project include:

- Traffic generated by the project; and
- Area source emissions from the use of natural gas, fireplaces, and consumer products.

Air pollutants generated by all land uses within the proposed Old Town CPU area were modeled based on average emissions from land use types. For the purposes of this analysis, it was assumed that the land use changes contained in the project would be fully constructed in 2035.

Generally, discretionary, program-level planning activities, such as general plans, community plans, specific plans, etc., are evaluated for consistency with the local air quality plan. In contrast, project-level thresholds are applied to individual project-specific approvals, such as a proposed development project. At the program level, the analysis looks at the emissions of build-out of the proposed Old Town CPU in relation to the adopted Community Plan to determine if the emissions would exceed the emissions forecasts included in the RAQS. Considering that the adopted Community Plan projects have not yet been completed at the time of this analysis, an analysis of existing emissions compared with the proposed Old Town CPU improvements would not accurately disclose the impacts of the project. Rather, comparing future operations with the adopted Community Plan and the proposed Old Town CPU provides the best indicator of the project's long-term effect on emissions. Therefore, the analysis of the project is based on the net change in future emissions estimates derived from the adopted Community Plan.

As such, the analysis evaluates the potential for future development within the proposed Old Town CPU area to result in, or contribute to, a violation of any air quality standard based on the net change in pollutant emissions that would result from the adopted Community Plan in the year 2035 compared to the emissions resulting from the project in the year 2035.

The operational emissions associated with the activities for the adopted Community Plan and the project in the year 2035 were quantified using CalEEMod. Regional mobile-source emissions were estimated

based on CARB’s Emission Factor model (EMFAC2014) and the VMT for the area estimated in the TIS (Chen Ryan Associates 2017; Appendix B). EMFAC2014 can be used to develop emission factors based on the location, operational year, vehicle type, fuel type, and vehicle speed. EMFAC2014 is the most current on-road mobile source emissions model at the time of this analysis. For this analysis, all traffic modeling was conducted for the 2035 build-out year. San Diego County was selected as the geographical location, which is the most specific geography to the project available in EMFAC. The VMT for the area provided in the TIS was weighted by the percentage of VMT for each vehicle type and multiplied by the aggregate speed emission factor to estimate daily emissions. Additional details are available in Appendix H.

Table 5.9-3 summarizes the estimated maximum operational emissions for the adopted Community Plan and the project by source. As shown in Table 5.9-3, operational emissions associated with the project would be higher for NO_x, CO, SO₂, PM₁₀, and PM_{2.5} when compared to the adopted Community Plan. The increase in VOC, NO_x, CO, SO₂, PM₁₀, and PM_{2.5} emissions is largely due the additional multi-family dwelling units and to the increase in VMT as provided in the TIS (Chen Ryan Associates 2017; Appendix B). ~~VOC emissions associated with the project would be less than the VOC emissions under the adopted Community Plan. The decrease in VOC emissions is due to changes in land uses and associated square footages.~~ For architectural coatings, CalEEMod contains coating application assumptions based on the land use type and square footage of buildings. CalEEMod assumes the total surface area for painting equals 2.7 times the floor square footage for residential land use and 2 times the square footage for nonresidential land use. ~~Due to the decrease in single-family homes, industrial, and institutional land uses, VOC emissions associated with architectural coatings are expected to decrease.~~ Additional modeling details are shown in Appendix H.

Condition	Source	Pollutant (pounds per day)					
		VOC	NO _x	CO	SO ₂	PM ₁₀	PM _{2.5}
Adopted Community Plan	Area	65.9 <u>51.88</u>	8.5 <u>15.36</u>	47.6 <u>19.41</u>	0.410	0.9 <u>1.26</u>	0.9 <u>1.25</u>
	Energy	1.542	13.6 <u>12.80</u>	40.4 <u>9.97</u>	0.408	1.0 <u>0.98</u>	1.0 <u>0.98</u>
	Mobile	9.992	41.443	196.223	1.002	19.444	8.0 <u>7.98</u>
	Total	77.3 <u>63.22</u>	63.5 <u>69.59</u>	254.2 <u>225.61</u>	1.219	21.468	9.9 <u>10.21</u>
Project	Area	62.5 <u>67.88</u>	9.5 <u>60.73</u>	53.2 <u>38.71</u>	0.439	1.0 <u>0.93</u>	1.0 <u>0.92</u>
	Energy	1.449	12.5 <u>13.36</u>	9.576	0.408	1.003	1.003
	Mobile	10.413	42.328	200.325	1.004	19.884	8.414
	Total	74.0 <u>79.50</u>	64.3 <u>116.37</u>	263.0 <u>248.71</u>	1.251	21.8 <u>25.80</u>	14.1 <u>10.4</u>
Net Change		(3.30) <u>16.28</u>	0.82 <u>46.78</u>	8.76 <u>23.10</u>	<0.131	0.4.12	0.23.88
Threshold of Significance ¹		137	250	550	250	100	100
Exceed Threshold?		NO	NO	NO	NO	NO	NO

Source: Estimated by AECOM in ~~2017~~2018

¹ City of San Diego, 2016

Note: Totals may not add due to rounding. NO_x = oxides of nitrogen, SO_x = oxides of sulfur, CO = carbon monoxide, PM₁₀ = particulate matter less than 10 micrometers in diameter, PM_{2.5} = particulate matter less than 2.5 micrometers in diameter, VOC/ROG = volatile organic compounds/reactive organic gases.

As shown in Table 5.9-3, the ~~proposed Old Town CPU would result in fewer VOC emissions and the net increase in~~ VOC, NO_x, CO, SO₂, PM₁₀, and PM_{2.5} emissions from the adopted Community Plan would not

exceed any of the significance thresholds. Therefore, the air emissions from build-out of the project would not cause a significant increase of air pollutants in the region, would not further increase the frequency of existing violations of NAAQS or CAAQS, or result in new exceedances. Air quality impacts associated with the adoption of the project would result in less than significant impacts.

Issue 3 Substantial Pollutant Concentrations

Would the project expose sensitive receptors to substantial pollutant concentrations?

a. Localized Carbon Monoxide Hot Spots Impacts

As explained in Section 5.2, the TIS (Chen Ryan Associates 2017; Appendix B) evaluated LOS for roadway segments and intersections based on the roadway geometrics, existing or forecasted traffic volumes, and other characteristics. The City of San Diego guidelines indicate that if a proposed development causes a four- or six-lane road to deteriorate to Level of Service (LOS) E or worse, the resulting longer queue at the traffic signals could cause a localized significant air quality impact. The proposed Old Town CPU area does not contain any six-lane roadway segments. As shown in Section 5.2, the four-lane roadway segments are not expected to deteriorate to LOS E or worse.

In addition to the changes in LOS as required by the City's CEQA Significance Determination Thresholds, overall traffic volumes and how they affect V/C ratio also affect the ability of a roadway or intersection to result in a CO hot spot. While the City of San Diego does not provide additional guidance on traffic volumes, other agencies throughout the state have provided estimates of traffic volumes that could result in a CO hot spot. The Bay Area Air Quality Management District's (BAAQMD) CEQA Guidelines (BAAQMD 2012) suggest that projects would not result in a CO impact if the project traffic would not increase traffic volumes at affected intersections to more than 44,000 vehicles per hour. Furthermore, the SMAQMD screening criteria find that a project would not result in significant localized CO impacts if it would not result in an affected intersection experiencing more than 31,600 vehicles per hour (SMAQMD 2016).

The busiest four-lane roadway segment in the proposed Old Town CPU area, Taylor Street (Pacific Highway/Rosecrans Street to Congress Street) has a maximum volume of approximately 30,500 vehicles per day in 2035. Therefore, the peak hour volume at any point during the day, which is typically 10 percent of the daily volume, would not exceed any of the screening thresholds that are anticipated to result in a CO hot spot.

Furthermore, as shown in Table 2-5, the maximum CO concentration registered in the proposed CPU area in the last 5 years (i.e., 3.0 ppm in 2013) is approximately 15 percent of the one-hour CAAQS. As a result of improvements in technology and vehicle emission standards, CO emission factors are projected to decrease in future years. These improvements would also reduce the concentration of CO emissions. Given these conditions, it is unlikely that the proposed CPU would cause an exceedance of the CAAQS. Thus, this impact would be would be less than significant.

b. Toxic Air Contaminants

Construction

Implementation of the proposed Old Town CPU would result in the construction of new buildings, structures, paved areas, roadways, utilities, and other improvements. Heavy-duty construction equipment, haul trucks, on-site generators, and construction worker vehicles associated with this construction could generate diesel PM, which the CARB identified as a TAC. Generation of diesel PM from construction projects typically occurs in a single area (e.g., at the project site) for a short period of time. Because construction activities and subsequent emissions vary depending on the phase of construction (e.g., grading, building construction), the construction-related emissions to which nearby receptors are exposed to would also vary throughout the construction period. During some equipment-intensive phases such as grading, construction-related emissions would be higher than other less equipment-intensive phases such as building construction or architectural coatings. Concentrations of mobile-source diesel PM emissions are typically reduced by 70 percent at a distance of approximately 500 feet (CARB 2005).

The dose (of TAC) to which receptors are exposed is the primary factor used to determine health risk. Dose is a function of the concentration of a substance in the environment and the extent of exposure a person has with the substance; a longer exposure period to a fixed amount of emissions would result in higher health risks. Building construction activities for individual projects, as part of the proposed Old Town CPU implementation, are anticipated to last approximately 6 months to a year. According to the Office of Environmental Health Hazard Assessment (OEHHA), health risk assessments (HRAs) used to determine the exposure of sensitive receptors to TAC emissions should be based on a 30-year exposure period; however, such assessments should also be limited to the period/duration associated with construction activities which implement the proposed CPU. Thus, if the duration of potentially harmful construction activities near a sensitive receptor was one year, the exposure would be approximately three percent of the total exposure period used for typical health risk calculations. Considering this information, the highly dispersive nature of diesel PM, and the fact that construction activities would occur intermittently and at various locations over approximately 18 years (i.e., 2017 to 2035), it is not anticipated that the implementation of the proposed Old Town CPU would expose sensitive receptors to substantial construction-related TAC concentrations. Therefore, this impact would be less than significant.

Stationary Sources

The project includes land uses that may generate air pollutants affecting adjacent sensitive land uses. The primary concern with stationary sources is local; however, they also contribute to air pollution in the SDAB. Stationary sources include gasoline stations, power plants, dry cleaners, and other commercial and industrial uses. Stationary sources are regulated by the local air pollution control or management district through the issuance of permits; in this case, the agency is the San Diego APCD.

The California Air Toxics Program establishes the process for the identification and control of toxic air contaminants and includes provisions to make the public aware of significant toxic exposures and for reducing risk. In accordance with AB 2588, if adverse health impacts exceeding public notification levels are identified, the facility would provide public notice, and if the facility poses a potentially significant public health risk, the facility must submit a risk reduction audit and plan to demonstrate how the facility would reduce health risks. Thus, with this regulatory framework, at the program level, impacts associated with stationary sources in the proposed Old Town CPU area would be less than significant.

Operation

The proposed Old Town CPU would include the development of residential and commercial land uses. Residential land uses do not typically generate substantial TAC emissions. Commercial land uses may potentially include stationary sources of TACs, such as dry-cleaning establishments and diesel-fueled back-up generators. As discussed above, these types of stationary sources, in addition to any other stationary sources (including industrial land uses) that may emit TACs would be subject to San Diego AQMD Rules and Regulations. Land uses that are more likely to generate substantial TAC emissions include industrial land uses that involve stationary sources and manufacturing processes.

The CARB has developed the Air Quality and Land Use Handbook: A Community Health Perspective to provide guidance on land use compatibility with sources of TACs (CARB 2005). The recommendations relevant to the proposed Old Town CPU include:

- Avoid siting new sensitive land uses within 500 feet of a freeway, urban roads with 100,000 vehicles per day, or rural roads with 50,000 vehicles per day.
- Avoid siting new sensitive land uses within 1,000 feet of a distribution center (that accommodates more than 100 trucks per day, more than 40 trucks with operating transport refrigeration units (TRUs) per day, or where TRU unit operations exceed 300 hours per week).
- Avoid siting new sensitive land uses within 300 feet of any dry cleaning operation.
- Avoid siting new sensitive land uses within 300 feet of a large gas station (defined as a facility with a throughput of 3.6 million gallons per year or greater). A 50 foot separation is recommended for typical gas dispensing facilities.

The proposed Old Town CPU contains the following policy related to siting of land uses and air quality:

CE-3.1 Incorporate building features into new buildings with residential units and other sensitive receptors located within 500 feet of the outside freeway travel lane to reduce the effects of air pollution.

Even with implementation of Policy CE-3.1, individual development projects could be located within the siting distances recommended by CARB's Air Quality and Land Use Handbook. However, CARB notes that these recommendations are advisory and should not be interpreted as defined "buffer zones," and that local agencies must balance other considerations such as transportation needs, the benefits of urban infill, community economic development priorities, and other quality-of-life issues. With careful evaluation of exposure, health risks, and affirmative steps to reduce risk, where necessary, CARB's position is that infill development, mixed use, higher density, transit-oriented development, and other concepts that benefit regional air quality can be compatible with protecting the health of individuals at the neighborhood level. Therefore, implementation of the proposed Old Town CPU is consistent with the goals of the CARB handbook and would not expose sensitive receptors to substantial pollutant concentrations. This impact would be less than significant.

Issue 4 Odors

Would the project create objectionable odors affecting a substantial number of people?

A potential odor impact can occur from two different situations: 1) the project would introduce receptors in a location where they would be affected by an existing or future planned odor source, or 2) proposed uses within the proposed Old Town CPU would generate odors that could adversely affect a substantial number of persons.

Potential sources that may emit odors during construction activities include equipment exhaust. Odors from these sources would be localized and generally confined to the immediate area surrounding the development area. Exhaust odors from diesel engines, as well as emissions associated with asphalt paving and the application of architectural coatings, may be considered offensive to some individuals. Similarly, diesel-fueled trucks traveling on local roadways would produce associated diesel exhaust fumes. However, odors associated with diesel fumes, asphalt paving, and architectural coatings would be temporary and would disperse rapidly with distance from the source. Projects constructed under the proposed CPU would use typical construction techniques, and the odors would be typical of most construction sites and temporary in nature. Therefore, construction-generated odors would not result in frequent exposure of on-site receptors to objectionable odor emissions.

The project would allow for development of multi-family residential and commercial land uses within the proposed Old Town CPU area. While specific developments within the proposed Old Town CPU area are not known at this program level of analysis, planned land uses would not encourage or support uses that would be associated with significant odor generation. Major sources of odors would include wastewater treatment and pumping facilities, sanitary landfills, painting/coating operations (e.g., auto body shops), and compositing facilities. Minor sources of odors associated with the proposed CPU could include restaurants, coffee roasters, and other urban land uses that are not typically associated with numerous odor complaints. The proposed Old Town CPU includes residential uses in proximity to commercial areas. A typical commercial land use in the proposed CPU area that would generate odors would be restaurants. Odors associated with restaurants or other commercial uses would be similar to existing residential and food service uses throughout the proposed Old Town CPU area and would not generally be considered adverse. Thus, implementation of the project would not create operational-related objectionable odors affecting a substantial number of people. Therefore, this impact would be less than significant.

5.9.4 Significance of Impacts

5.9.4.1 Conflict with Air Quality Plan

The net increase in construction and operational emissions under the project over the adopted Community Plan would not result in the generation of criteria air pollutants that would exceed any of the thresholds. Thus, emissions associated with the project are already accounted for in the RAQS, and adoption of the project would not conflict with the RAQS. Thus, impacts related to conflicts with applicable air quality plans would be less than significant, and no mitigation is required.

5.9.4.2 Air Quality Standards

Regarding construction emissions, based on the worst case construction emission analysis with an intensive year of construction discussed previously, air emissions associated with build-out of individual projects under the project would not exceed any of the significance thresholds. Thus, construction emissions would be less than significant, and no mitigation is required.

Regarding operational emissions, the net increase in emissions compared to the existing Community Plan would not exceed the applicable thresholds of significance. Therefore, air emissions from build-out of the project would not significantly increase air pollutants in the region, would not further increase the frequency of existing violations of NAAQS or CAAQS, or would not result in new exceedances. Therefore, operational air quality impacts associated with the implementation of the project would be less than significant. Thus, no mitigation is required.

5.9.4.3 Substantial Pollutant Concentrations

Regarding impacts to sensitive receptors, implementation of the project would not result in any CO hotspots. The proposed Old Town CPU contains policies related to siting of land uses and air quality, and implementation of the proposed Old Town CPU is consistent with the goals of the CARB handbook. Thus, air quality impacts to sensitive receptors would be less than significant, and no mitigation is required.

5.9.4.4 Odors

The project does not propose land uses associated with generation of adverse odors. Further, San Diego APCD rules prohibit the emission of any material which causes a nuisance to a considerable number of persons or endangers the comfort, health, or safety of the public. Therefore, impacts would be less than significant, and no mitigation is required.

5.9.5 Mitigation Framework

All impacts related to air quality impacts would be less than significant. Thus, no mitigation is required.

This page intentionally left blank.

5.10 Greenhouse Gas Emissions

This section addresses the potential GHG emissions and impacts associated with the project. This section is based on the Greenhouse Gas Analysis for the Old Town Community Plan Update (Greenhouse Gas Report) prepared by AECOM (2017) for the project (Appendix I).

5.10.1 Existing Conditions

The existing environmental setting and regulatory framework are summarized in Chapters 2.0 and 4.0, respectively.

5.10.1.1 Methodology and Assumptions

Annual GHG emissions were calculated for both the adopted Community Plan and the proposed CPU at project build-out using California Emissions Estimator Model (CalEEMod) version 2016.3.1. The emissions sources include construction (off-road vehicles), mobile (on-road vehicles), area (fireplaces, consumer products [cleansers, aerosols, and solvents], landscape maintenance equipment, and architectural coatings), water and wastewater, and solid waste sources. Where project-specific data was not available, model inputs were based on default CalEEMod estimates.

GHG emissions are estimated in terms of metric tons of carbon dioxide equivalent (MT CO₂e). CO₂e emissions are the preferred way to assess combined GHG emissions because they give weight to the global-warming potential (GWP) of different gases. The GWP is the potential of a gas to warm the global climate in the same amount as an equivalent amount of emissions of carbon dioxide (CO₂). For example, CO₂ has a GWP of 1, methane (CH₄) has a GWP of 25, and nitrous oxide (N₂O) has a GWP of 298, which means CH₄ and N₂O have 25 and 298 times greater global warming effect than CO₂, respectively (IPCC 2007).

a. Estimating Construction Emissions

At a program level, it would be speculative to estimate the schedule and construction requirements of each individual project that could occur in the proposed Old Town CPU area. In Section 5.9, Air Quality, the emissions estimated to occur were based on an assumption that up to 25 percent of the total land uses would be constructed in a single year. However, GHG emissions would occur based on the entire construction activities through 2035. Thus, consistent with the methodology used in the San Diego County Updated Greenhouse Gas Inventory (San Diego County 2013), which forecasts that between 2015 and 2035 construction emissions would comprise roughly 2.1 percent of total GHG emissions within the County of San Diego, total construction emissions associated with the planning area are estimated at 2.1 percent of the total operational GHG emissions. Therefore, based on the operational GHG emissions estimated in Table 5.10-1, total construction emissions for the proposed Old Town CPU would be ~~644~~approximately 730 MT CO₂e.

b. Estimating Vehicle Emissions

Vehicle emissions are calculated based on the vehicle type, the trip rate, and trip length for each land use. GHG emissions generated from mobile sources were estimated based on CARB's Emission Factor (EMFAC2014) model. EMFAC2014 includes GHG reducing effects from the implementation of Pavley I (Clean Car Standards) and the Low Carbon Fuel Standard, and are thus considered in the calculation of emissions.

The proposed Old Town CPU encourages increased development diversity by increasing commercial and multi-family land uses in certain areas, and decreasing the number of single-family residential units and planned institutional land uses. The project proposes an increase in multi-family residences in close proximity to transit and existing commercial uses.

c. Estimating Energy Use Emissions

CalEEMod estimates GHG emissions from energy use by multiplying average rates of residential and non-residential energy consumption by the number of residential units and non-residential square footage to obtain total projected energy use. This value is then multiplied by electricity and natural gas GHG emission factors applicable to the project location and utility provider.

Building energy use is typically divided into energy consumed by the built environment and energy consumed by uses that are independent of the construction of the building such as plug-in appliances. In California, Title 24 governs energy consumed by the built environment, mechanical systems, and some types of fixed lighting. Non-building energy use, or "plug-in energy use," can be further subdivided by specific end-use (refrigeration, cooking, office equipment, etc.).

Energy consumption values are based on the CEC sponsored *California Commercial End Use Survey and Residential Appliance Saturation Survey* studies, which identify energy use by building type and climate zone. CalEEMod 2016.3.1 is based on the 2013 Title 24 energy code (Part 6 of the Building Code).

The proposed Old Town CPU area would be served by SDG&E. Therefore, SDG&E's specific energy intensity factors (i.e., the amount of CO₂, CH₄, and N₂O per kilowatt-hour) are used in the calculations of GHG emissions. The state mandate for renewable energy is 33 percent by 2020 and 50 percent by 2030 under the RPS. However, the analysis conservatively assumes the same RPS as existing conditions.

d. Estimating Area Source Emissions

Area sources include GHG emissions that would occur from natural gas combustion from the use of natural gas fireplaces and the use of landscaping and related equipment. The use of landscape equipment emits GHGs associated with the equipment's fuel combustion. Emissions from landscape maintenance equipment within CalEEMod are based on statewide average number of usage hours, number of dwelling units, and non-residential square footage. However, statewide landscape equipment usage on a per dwelling unit or per square foot basis is not representative of the urban and higher-density land uses of the Old Town Community Plan area. For example, landscape equipment usage would not increase in proportion to the increase in units for high density multi-family residential and square footage for multi-story buildings. Higher density buildings are typically multi-story and thus would not result in an

increase in landscape areas. Therefore, emissions associated with landscape equipment were calculated off-model and based on San Diego County annual emission estimates for lawn and garden equipment for the San Diego Air Basin and acres of development for the San Diego region. Additional details are available in Appendix I.

e. Estimating Water and Wastewater Emissions

The amount of water used and wastewater generated by a project has indirect GHG emissions associated with it. These emissions are a result of the energy used to supply, distribute, and treat the water and wastewater. In addition to the indirect GHG emissions associated with energy use, wastewater treatment can directly emit both CH₄ and N₂O.

The indoor and outdoor water use consumption data in CalEEMod for each land use subtype comes from the Pacific Institute's *Waste Not, Want Not: The Potential for Urban Water Conservation in California* (2003) and the American Water Works Association Research Foundation's *Commercial and Institutional End Uses of Water* (2000). Based on those reports, a percentage of total water consumption was dedicated to landscape irrigation, which is used to determine outdoor water use. Wastewater generation was similarly based on a reported percentage of total indoor water use (CAPCOA 2016).

In addition to water reductions under the California Green Building Standards Code (CalGreen), the GHG emissions from the energy used to transport the water are affected by RPS. As discussed previously, the analysis conservatively assumes existing RPS.

f. Estimating Solid Waste Emissions

The disposal of solid waste produces GHG emissions from anaerobic decomposition in landfills, incineration, and transportation of waste. To calculate the GHG emissions generated by disposing of solid waste for the project, CalEEMod uses waste disposal rates identified by California Department of Resources Recycling and Recovery to calculate the total volume of solid waste. The methods for quantifying GHG emissions from solid waste are based on the Intergovernmental Panel on Climate Change (IPCC) method using the degradable organic content of waste. GHG emissions associated with the project's waste disposal were calculated using these parameters. No solid waste reductions were modeled.

5.10.2 Significance Determination Thresholds

According to the City's CEQA Significance Determination Thresholds, a project may have a significant effect on the environment with respect to GHG emissions if it would:

1. Generate GHG emissions, either directly or indirectly, that may have a significant impact on the environment; or
2. Conflict with the City's Climate Action Plan or another applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of GHGs.

The CAP was originally adopted in December 2015, and implementing actions necessary for the CAP PEIR to serve as a Qualified GHG Reduction Plan under CEQA Guidelines Section 15183.5 were adopted by City Council on July 12, 2016. This section of the CEQA Guidelines permits for discretionary

projects under CEQA that are consistent with the CAP, to be able to tier off the GHG analysis set forth in the CAP Final EIR, which was certified on December 15, 2015, with an addendum certified on July 12, 2016. Analysis within this PEIR directly tiers off of the CAP PEIR for cumulative GHG emissions under Section 15183.5. As such consistency with the City's CAP is used to evaluate the significance of the project's GHG impact. A consistency analysis of the proposed CPU and associated discretionary actions with the CAP is evaluated first through a comparison of the land use and transportation assumptions for which the CAP was developed, and secondly through a qualitative analysis of policies associated with the proposed CPU.

5.10.3 Impact Analysis

Issue 1 Greenhouse Gas Emissions

Would the project generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?

As compared to the existing land uses, the project would reduce institutional land uses while increasing the development of commercial uses and multi-family dwelling units. This change represents a change in the percentage of land use types and density in the Community Plan area. ~~The project would change the planned land use mix as follows:~~

- ~~• Increase the projected number of multi-family residential units by approximately 26 percent;~~
- ~~• Decrease the projected number of single-family residential units by approximately 35 percent;~~
- ~~• Increase the amount of land designated for commercial development by 11 percent; and~~
- ~~Decrease the amount of land designated for institutional development by 48 percent.~~

Based on the methodology summarized above, GHG emissions were calculated for the existing land uses (baseline), the land uses at build-out of the adopted Community Plan (in Year 2035), and the land uses of the project (in Year 2035). Table 5.10-1 summarizes the GHG emissions under each scenario. Appendix I contains additional details.

**Table 5.10-1
GHG Emissions for the Old Town Community Plan Area
(MT CO₂e per Year)**

Emission Source	Existing	Adopted Community Plan	Proposed CPU	Difference (Proposed CPU– Adopted Community Plan)
Mobile Sources	25,025	17,300	17,654	355
Energy Use	9,182	10,533,319	9,802,110,066	(731)747
Area Sources	724,729	388,738	4352,905	462,167
Solid Waste Disposal	767	896,789	816,929	(80) [†] 140
Water Use	1,823	1,985,899	4,798,218	(186)289
Construction	n/a	653,652	644,730	(13)78
TOTAL	37,521,526	31,755,696	31,146,354,711	(609)3,775

Source: Estimated by AECOM in 2017/2018 (Appendix I)

[†]Solid waste disposal associated with GHG emissions decrease based on changes in land use from the adopted Community Plan to the proposed CPU. Waste generation rates vary for each land use; the largest decrease in solid waste is a result from the reduction in some existing industrial uses.

For the purposes of determining significance, GHG emissions attributable to the project in 2035 were compared to the adopted Community Plan GHG emissions. This comparison is appropriate because the GHG emissions from the adopted Community Plan were used when developing the City's CAP GHG Inventory.

As shown in Table 5.10-1, the project would result in a ~~decrease~~net increase in GHG emissions of ~~6093,775~~ MT CO₂e per year when compared to the emissions that would occur under the adopted Community Plan; ~~thus would be consistent with the City's CAP emissions inventory. In addition, the proposed Old Town CPU would be consistent with the CAP and City of Villages strategy.~~

~~With the exception of mobile sources and area sources,~~ Emissions from all sources would ~~decrease~~increase under the proposed CPU when compared to the adopted Community Plan. This is because, as shown in Table 5.10-1, the project would include an additional 835 dwelling multi-family dwelling units over the adopted Community Plan. However, the majority of the new multi-family dwelling units are planned within areas within a 0.5-mile radius of the Old Town Transit Center in the Taylor, Core, Jefferson, and Hortensia Sub-Districts. A majority of the proposed CPU is also located within a designated Transit Priority Area (TPA). TPAs and the Sub-Districts would implement CAP and City of Villages strategies by focusing projected future growth into mixed-use and multiple-use activity centers that are pedestrian- and bicycle-friendly and linked to transit. Consistency with the CAP and City of Villages strategy however would result in community plan areas having an increase in aggregated GHG emissions from increased population; however, on a per capita basis a decrease of GHG emissions would occur. Further, overall Citywide GHG emissions per capita would result that are consistent with the City's CAP targets for Citywide GHG emissions reductions.

~~Therefore, while the project would result in a decrease in~~ increase aggregated GHG emissions when compared with land uses currently approved, over those of the adopted Community Plan-, this increase in GHG is a direct result of the implementation of CAP Strategies and ~~as shown above, the proposed CPU is consistent with the~~ the General Plan's City of Villages Strategy. Increasing residential and the CAP commercial density in transit corridors and Community Villages within a TPA would support the City of San Diego in achieving the GHG emissions reduction targets of the CAP, and thus, impacts associated with GHG emissions would be less than significant.

Issue 2 Conflicts with Plans or Policies

Would the project conflict with the City's Climate Action Plan or another applicable plan, policy, or regulation adopted for the purpose of reducing emissions of greenhouse gases?

The regulatory plans and policies discussed in Chapter 4.0 of this PEIR aim to reduce national, state, and local GHG emissions by primarily targeting the largest emitters of GHGs: the transportation and energy sectors. Plan goals and regulatory standards are, thus, largely focused on the automobile industry and public utilities. For the transportation sector, the reduction strategy is generally three-pronged: to reduce GHG emissions from vehicles by improving engine design; to reduce the carbon content of transportation fuels through research, funding and incentives to fuel suppliers; and to reduce the miles these vehicles travel through land use change and infrastructure investments.

For the energy sector, the reduction strategies aim to: reduce energy demand; impose emission caps on energy providers; establish minimum building energy and green building standards; transition to renewable non-fossil fuels; incentivize homeowners and builders; fully recover landfill gas for energy; and expand research and development.

a. Consistency with State Plans

As discussed earlier, Executive Order S-3-05 establishes GHG emission reduction targets for the state, and AB 32 launched the Climate Change Scoping Plan (Scoping Plan) that outlines the reduction measures needed to reach these targets. In December 2017, CARB adopted the 2017 Scoping Plan Update that provides a framework for actions to reduce California's GHG emissions and requires CARB and other State agencies to adopt regulations and other initiatives to reduce GHGs. As such, the Scoping Plan is not directly applicable to City planning efforts and projects, although there are several regulatory measures aimed at the identification and reduction of GHG emissions. Most of these regulatory measures focus on area source emissions (e.g., energy usage, high-global warming-potential GHGs in consumer products) and changes to the vehicle fleet (e.g., more fuel-efficient vehicles, reduced VMT, fuel economy). The project would be generally consistent with the Scoping Plan framework to reduce electricity demand by increasing the efficiency of Utility Energy Programs and adoption of more stringent building and appliance standards. The new construction associated with implementation the project would be required to include all mandatory green building measures under the CalGreen Code. Therefore, the project is consistent with the Scoping Plan.

b. Consistency with Regional Plans

The project is consistent with the goals of the SANDAG RTP/SCS2015 Regional Plan to develop compact, walkable and bicycle-friendly communities close to transit connections and consistent with smart growth principles. The project would reinforce opportunities for housing near the Old Town Transit Station, bicycle lanes, and establish three pedestrian-oriented, urban, and mixed-use Villages that would reduce reliance on the automobile, and promote walking and biking and the use of alternative transportation. Policies contained within the proposed CPU Land Use and Mobility elements serve to promote bus transit use as well as other forms of mobility, including walking and bicycling. These measures are consistent with the RP's2015 Regional Plan's Sustainable Communities Strategy. Thus, the project is consistent with the RP2015 Regional Plan.

c. Consistency with Local Plans

New land use designations and policies within the proposed Old Town CPU have been designed to reflect and implement the CAP and the GHG reduction recommendations of the General Plan. Specifically, the proposed Old Town CPU includes updated Land Use, Mobility, and Conservation elements that include multiple policies aimed at reducing GHG emissions from target emission sources and adapting to climate change. The proposed policies refine existing General Plan policies with site-specific recommendations applicable to the individual community.

The CAP establishes five primary strategies for achieving the Citywide goals of the plan. Strategy 1 (Energy & Water Efficient Buildings) includes goals, actions, and targets with the aim of reducing building energy consumption. Energy reduction can be achieved through the continued use or adaptive reuse of the existing building stock along with any needed energy efficiency upgrades. The proposed Old Town

CPU includes narrative and policies in the Conservation Element (CE) for the creation of energy- and water-efficient buildings. The proposed Old Town CPU includes discussion and policies to address water usage within the Urban Design (UD) Element and Conservation Element, and encourages sustainable building design and incorporation of building features that would reduce water consumption. This is coupled with reducing the dependency on non-renewable energy sources and the maximization of daylight and natural ventilation, the minimization of solar heat gain, and the reduction of emissions.

Regarding CAP Strategy 2 (Clean & Renewable Energy), the Conservation Element of the proposed Old Town CPU includes policies to encourage development that incorporates renewable energy, such as photo-voltaic panels on roof tops. The Conservation Element of the proposed Old Town CPU also contains an overarching goal to reduce dependence on non-renewable energy sources, and policies that include the use of sustainable building techniques for construction and operation of buildings that could include solar energy installations, electric vehicle charging stations, and solar water heating.

Strategy 3 (Bicycling, Walking, Transit & Land Use) of the CAP has a number of goals that relate to land use and planning. Action 3.1 in Strategy 3 of the CAP calls for implementation of the General Plan's Mobility Element and the City of Villages strategy in Transit Priority Areas (TPAs) to increase the use of transit. As discussed in Section 5.1.3 of this PEIR, the proposed Old Town CPU is consistent with the General Plan's Mobility Element and the City of Villages strategy and is thus consistent with Action 3.1 of the CAP. Further, a majority of the community is also within a half-mile walking distance to an existing or future transit stop, and thus, within a TPA.

Consistent with Actions 3.4 and 3.5, the Mobility and Conservation Elements includes policies to support intelligent transportation systems to improve roadway and parking efficiency, congestion, and install roundabouts where needed to reduce vehicle fuel consumption (ME-4.4, ME-5.1, ME-6.1, CE-1.1). Consistent with Action 3.6 of the CAP, specific Mobility Element policies include, but are not limited to, coordinating with MTS and SANDAG to implement transit priority measures, encouraging the implementation of Rapid Bus to serve the areas of future residential and employment uses, and coordinating with MTS, SANDAG, and adjacent property owners to improve accessibility and the environment at transit stops (ME-3.1, 3.2).

The primary goal of CAP Strategy 4 (Zero Waste – Gas & Waste Management) is to divert solid waste and capture landfill methane gas emissions. This strategy is Citywide in nature; however, the proposed Old Town CPU furthers this strategy by including policies in the Urban Design and Conservation elements that support the use of recycled materials in public improvements, encouraging recycled or rapidly renewable source materials, and recycling of building materials for both public and private new development.

Strategy 5 (Climate Resiliency) of the CAP calls for further analysis of the resiliency issues that face the various areas of the City. Resiliency is addressed throughout the proposed Old Town CPU as it pertains to water usage, energy efficiency, and sustainable development practices as noted above. Also included within the proposed Old Town CPU are policies supporting and encouraging sustainable building methods, materials and features that are consistent with the historic character of Old Town and adapted to San Diego's climate (policy UD-3.1, Box 5-2), as well as an increase in the tree canopy within the community to reduce summer heat temperatures, increase absorption of pollutants and carbon dioxide, and contribute to more inviting business districts for pedestrians. The selection, siting, and management

of the planting of street trees within the proposed Old Town CPU area are outlined within the proposed CPU to ensure successful establishment of trees to meet the CAP goals.

As discussed above, analysis within this PEIR directly tiers off of the CAP PEIR for cumulative GHG emissions under Section 15183.5. The proposed CPU and associated discretionary actions are consistent with the adopted CAP, and contain goals and objectives that implement all of the five primary CAP strategies. Therefore, the project would not conflict with the City's CAP or any other applicable plan, policy, or regulation adopted for the purpose of reducing emissions of greenhouse gases impacts, and impacts would be less than significant.

5.10.4 Significance of Impacts

5.10.4.1 Greenhouse Gas Emissions

Potential impacts related to GHG emissions from implementation of the project would be less than significant; ~~the project would result in a decrease in GHG emissions when compared with land uses currently approved. The proposed CPU is also consistent with the City of Villages strategy and the CAP, as the increase in aggregated GHG emissions from the project is attributable to increased residential densities and employment intensity in TPAs as outlined in the CAP and City of Villages strategy.~~ However, on a per capita basis, a decrease of GHG emissions would occur. Further, overall Citywide GHG emissions per capita would result, consistent with the City's CAP targets for Citywide GHG emissions reductions. Thus, the project is consistent with the CAP and would result in a less than significant impact related to GHG emissions. No mitigation is required.

5.10.4.2 Conflicts with Plans or Policies

As discussed above, the project is consistent with the adopted CAP, and contains goals and objectives that implement all of the five primary CAP strategies. It is concluded that the project would be consistent with each of the CAP strategies by:

- Support future growth near the Old Town Transit Center to promote continued transit use;
- Enhance the pedestrian and bicycle network;
- Improve roadway and parking efficiency, congestion, and install roundabouts where needed to reduce vehicle fuel consumption.
- Encourage development that incorporates renewable energy;
- Supporting waste reduction, recovery, and recycling;
- Encourage sustainable building methods, materials and features; and
- Increasing the tree canopy.

Therefore, the project would not conflict with the City's CAP or any other applicable plan, policy, or regulation adopted for the purpose of reducing emissions of greenhouse gases impacts, and impacts would be less than significant. No mitigation is required.

5.10.5 Mitigation Framework

All impacts related to GHG emissions would be less than significant. Thus, no mitigation is required.

5.11 Public Services and Facilities

Existing public services and facilities, including parks, recreation centers, libraries, schools, fire, emergency medical, and police serve the residents and businesses within the Old Town community. The following provides a discussion of the existing and planned public services and facilities that are, or will be, available to the proposed Old Town CPU area. The information provided below is based on communications with the service providers during preparation of this PEIR, which are included in Appendix K ~~are of~~ this PEIR.

5.11.1 Existing Conditions

The existing environmental setting and regulatory framework are summarized in Chapters 2.0 and 4.0, respectively.

5.11.2 Significance Determination Thresholds

Based on the City's Significance Determination Thresholds, which have been adapted to guide a programmatic analysis of the project, a significant public services and facilities impact would occur if implementation of the project would:

1. Promote growth patterns resulting in the need for and/or provision of new or physically altered public facilities (including police protection, parks, or other recreational facilities, fire/life safety protection, libraries, or schools, the construction of which could cause significant environmental impacts in order to maintain service ratios, response times, or other performance objectives.

5.11.2.1 Methodology and Assumptions

Potential impacts resulting from implementation of the proposed CPU were evaluated based on relevant information from the City of San Diego General Plan, the SDUSD, the City's Police and Fire Departments, and Existing Conditions Reports for the proposed CPU area. Based on a review of relevant public facility and safety standards, policies, and population buildout and capacity estimates, the analysis presents the potential for impacts related to constructing public services and facilities within the proposed CPU area. Programmatic impacts are discussed in broad, qualitative terms as no projects are proposed within the proposed CPU. This assessment does not satisfy the need for project-level CEQA analysis for individual projects. Individual projects under the proposed CPU may require a project-level analysis at the time they are proposed based on the details of these projects and the existing conditions at the time such projects are pursued.

5.11.2.2 Summary of Impacts

Implementation of the proposed CPU would result in population increase at buildout, which would contribute to the demand for police protection, parks and other recreational facilities, fire and public safety, libraries, and schools. Police and fire protection must meet standards stated in the City's General Plan, and are further supported by the IFS and proposed CPU policies. Implementation of the proposed CPU would provide for a greater ratio of usable park acres per person than under existing conditions. The proposed CPU would also provide policies for the provision of additional school facilities as needed.

5.11.3 Impact Analysis

Issue 1 Public Facilities

Would the project promote growth patterns resulting in the need for and/or provision of new or physically altered public facilities (including police protection, parks or other recreational facilities, fire/life safety protection, libraries, or schools, the construction of which could cause significant environmental impacts in order to maintain service ratios, response times, or other performance objectives?

a. Police Protection

Within the proposed Old Town CPU area, the Western Division of the SDPD does not meet the Citywide response time goals detailed in Section 4.11.1 of this PEIR for Priority 1 through Priority 4 calls, but does meet the response time goal for emergency calls. There are no current plans for additional police substations in the proposed Old Town CPU area. The SDPD identifies that police response times within Old Town will continue to increase with implementation of the proposed Old Town CPU, which could ultimately result in the need for new or expanded police services. However, as future development is proposed within the proposed Old Town CPU area, individual projects would be subject to applicable DIF for public facilities financing in accordance with SDMC Section 142.0640. The proposed Old Town CPU includes a comprehensive IFS that will define applicable DIF for future development.

Proposed Old Town CPU policies support provision of police services within the proposed CPU area through upholding Old Town's existing level of police service and maintaining a community relations program between police, residents, and property owners.

Despite the population growth assumed in the proposed CPU, no new police facilities have been identified. Therefore, implementation of the project would result in less than significant environmental impacts associated with the construction of new facilities in order to maintain service ratios, response times, or other performance objectives related to police services.

b. Parks and Recreation

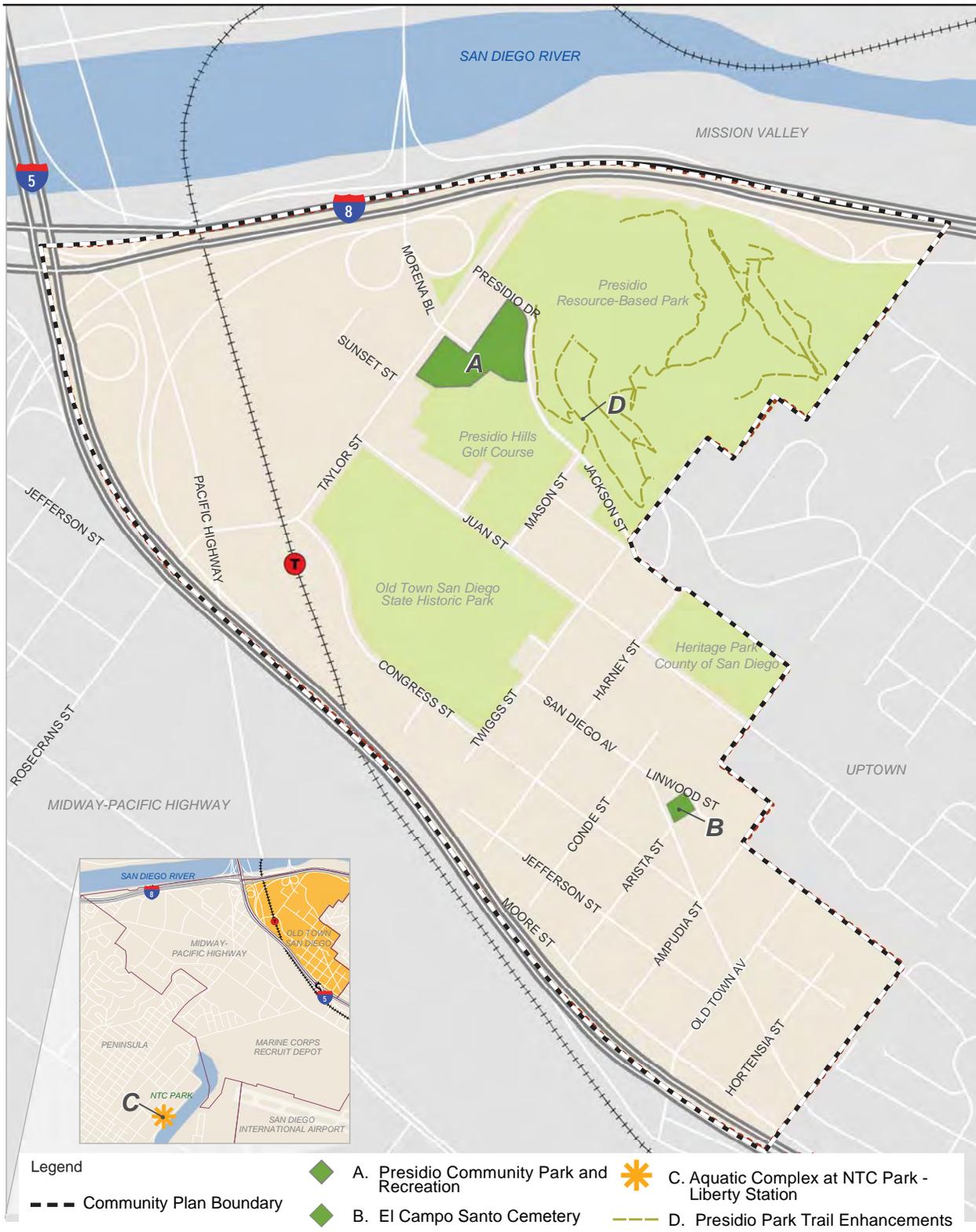
Based on the projected population for the Old Town community, 2,430, General Plan standards for population-based parks and recreation facilities would require the community to be served by a minimum of 6.8 usable acres of parkland at full community development. Additionally, at full community development, the projected population warrants approximately 10 percent of a 17,000-square-foot recreation center (equivalent to 1,652 total square feet) serving a population of 25,000, and approximately 5 percent of one aquatic complex serving a population of 50,000.

Opportunities for additional park and recreation facilities within the Old Town community are anticipated to come primarily through redevelopment of private and public properties, and through the development of park equivalencies as detailed below. Facilities that may be considered as population-based park equivalencies include:

- Joint use facilities;
- Trails;
- Portions of resource-based parks;
- Privately owned, publicly used parks; and
- Non-traditional parks, such as rooftop or indoor recreation facilities.

The General Plan allows park equivalencies to be used when vacant land is limited, unavailable, or cost-prohibitive. The application of park equivalencies is determined by the community and City staff through a set of guidelines. The community and City identified and evaluated population-based park and recreation opportunities, as well as potential park equivalency sites, for their recreational value, possible uses and functions, public accessibility, and consistency with General Plan policies and guidelines. Tables 5.11-1 and 5.11-2 summarize the existing and proposed parks and equivalencies that have been selected by the Old Town community to supplement their existing population-based park inventory. The tables also include recommendations generated by the community and City staff for additional park facilities. Figure 5.11-1 shows the locations of existing and proposed park facilities.

A total of 6.8 acres of population-based parks would be needed to serve Old Town at full community development, of which 3.43 acres currently exist. Through the proposed Old Town CPU effort, City staff and community members have identified 3.37 acres of proposed new population-based park equivalencies within the Old Town community that, when implemented, would satisfy the 6.8-acre population-based park requirement to serve Old Town at full community development.



Source: City of San Diego

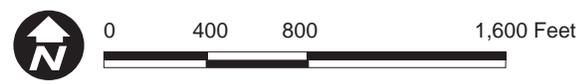


Figure 5.11-1
Parks, Recreation Facilities, and Open Space

Table 5.11-1 Population-Based Parks and Recreation Facilities				
Parks/ Recreation Facilities	Existing Usable Acreage	Future Usable Acreage	Parks and Recreation Facilities Locations and Descriptions	Parks and Recreation Facilities Recommendations
Population-Based Parks				
Presidio Community Park (Community Park and Recreation Center)	3.15 AC		Existing park located at the corner of Taylor Street and Presidio Drive.	Design and construct additional recreational facilities at the Presidio Community Park, which may include: new children's play area, picnic area improvements, security lighting, fencing, and landscaping.
El Campo Santo Pocket Park Cemetery	0.28 AC		Existing park located on the east side of San Diego Avenue at the intersection of Arista Street.	Design and construct additional recreational facilities at the El Campo Santo Pocket Park Cemetery, which may include: interpretive signage, accessibility improvements, security lighting, and benches.
Portions of Resource-Based Parks				
Presidio Park Trails		3.37 AC	Proposed trail improvements to existing trails within Presidio Park.	Design and construct multi-use trail improvements, which could include: trailheads, overlooks, walkways, interpretive signs, protective fencing, security lighting, drinking fountains, trash receptacles, benches, tables, and native landscaping, where needed and appropriate for the trail type.
Recreation Centers				
Presidio Community Park Recreation Center		N/A	Existing recreation center located at the corner of Presidio Drive and Jackson Street.	Design and construct an expansion to the existing recreation center, which may include: community meeting and multi-purpose rooms, office space, equipment storage, and other recreational activities as needed.
<i>Note: Acreage already included in total above for Presidio Community Park.</i>				
Aquatic Complex				
NTC/Liberty Station Aquatic Complex		N/A	Proposed Aquatic Complex to be located at NTC/Liberty Station.	The aquatic complex will provide a 50-meter pool, a 25-meter instruction pool and a family area with interactive water-play elements. The pool plan also includes locker rooms, offices, restrooms, storage, and a concession stand.
Aquatic Complex		N/A	Proposed Aquatic Complex to be located at a future site in the Peninsula or Midway-Pacific Highway communities.	Design and construct Aquatic Complexes which could include a swimming pool, universal access and water amenities such as a children's pool and a therapeutic pool, and a pool house including locker rooms, staff offices, and equipment storage facilities. These proposed Aquatic Complexes would be shared with the communities of Peninsula, Ocean Beach, Midway-Pacific Highway, and Old Town San Diego as specified in Table 5.11-2.

AC = acre(s); N/A = not applicable; SF = square feet

Table 5.11-2 Summary of Existing and Proposed Population-Based Parks and Recreation Facilities	
Population-Based Parks	Usable Acres
Existing Population-based Parks and Park Equivalencies	3.43 acres
Proposed Population-based Parks and Park Equivalencies	3.37 acres
Total Existing and Proposed Population-based Parks and Equivalencies	6.80 acres
Population-based Park Requirements at full community development	6.80 acres
Population-based park deficit at full community development	0 acres
Recreation Centers	Square Feet
Existing Recreation Centers:	5,302 SF
Proposed Recreation Center	0 SF
Total Existing and Proposed Recreation Centers	5,302 SF
Recreation Center Requirement at full community development	1,652 SF
Aquatic Complex	Percentage
Existing Aquatic Complexes	0%
Proposed Aquatic Complex: Liberty Station – NTC Park (Shared)	3% ^a
Proposed Aquatic Complex: Midway/Pacific Highway (Shared)	2% ^b
Total Existing and Proposed Aquatic Complexes	5%
Aquatic Complexes Requirement at full community development	5%

Notes:

^a An Aquatic Complex will be shared as follows: Peninsula 31%, Midway-Pacific Highway 22%, Ocean Beach 12%, Old Town San Diego 2%, 34% Unidentified.

^b NTC/Liberty Station Aquatic Complex will be shared as follows: Peninsula 46%, Ocean Beach 18%, Midway - Pacific Highway 33%, and Old Town San Diego 3%.

The proposed Old Town CPU would add additional population to the proposed CPU area. Until the aquatic complexes are constructed, the existing deficit and the associated adverse impact would continue. Future development within the proposed Old Town CPU area would be subject to payment of DIF for public facilities financing in accordance with SDMC Section 142.0640. The proposed Old Town CPU includes an IFS that would define applicable DIF fees for future development including fees for park funding. However, fees would not be adequate to address the existing aquatic center deficit. Payment and receipt of DIF funds are contingent on future development, and proposed fees are not designed to fully fund and address the existing aquatic center deficit.

The proposed Old Town CPU Recreation Element provides a policy framework that supports improvements and better access to facilities to enhance the recreational experience within Old Town. The Recreation Element aims to capitalize on the community's location, history, and walkability by strengthening connections between residential sub-districts, the parks and recreation center within Old Town, and the San Diego River Park. While implementation of the project would provide policy support for increasing the acreage of population-based parks in the proposed CPU area, it does not propose any specific facilities at this time.

As described in Chapter 3, Project Description, the project allows for development of the parks and recreational facilities generally described in the proposed CPU's Recreation Element (discussed in Section 3.4.1.7). While the proposed CPU proposes acreages and allows for the development of parks, no specific facilities have been identified in the proposed CPU; therefore, no specific impacts can be identified. The General Development Plan process for parks would be required for any park facility to determine use and layout of facilities and without that information and process, no impacts can be identified. Individual park projects under the proposed CPU may require a project-level analysis at the time they are proposed, based on the details of the parks and the existing conditions at the time such

projects are pursued. Thus, although the existing deficit for an aquatic complex will remain, the proposed CPU contains policies to promote future shared aquatic complexes in neighboring communities. As such, implementation of the project would result in a less than significant impact associated with the construction of new facilities in order to ~~maintain performance objectives~~ achieve General Plan standards for parks and an aquatic complex.

c. Fire/Life Safety Protection

With implementation of the project, there would be an increase in overall population, which most likely would result in a change in response times. Future facilities would be planned to meet community needs based on adopted General Plan Public Facilities Element standards detailed in Chapter 4.0, Regulatory Framework (Section 4.11) of this PEIR. The expected increase in population would not require that the Fire-Rescue Department expand or construct new facilities. Despite the population growth assumed in the proposed CPU, no new fire/life safety facilities have been identified.

The proposed Midway-Pacific Highway CPU contains a policy framework that addresses maintaining sufficient fire and rescue services throughout the proposed CPU area. As future development is proposed within the proposed Old Town CPU area, individual projects may be subject to payment of DIF, which would provide facilities financing in accordance with SDMC Section 142.0640. The proposed Old Town CPU includes a comprehensive IFS that will define applicable DIF fees for future development, including funding for fire/life safety facilities.

As noted in Section 2.3.4~~21~~²¹¹, although no additional fire stations are planned within the Old Town community, expansion plans and eventual new replacement facilities at Fire Station 8 within the Uptown community and Fire Station 20 within the Midway-Pacific Highway community would be undertaken to meet the current needs of the area neighborhoods and the stations' personnel. In addition, Fire Station 15, within the Ocean Beach community, would also be expanded and is included in the Old Town IFS. Eventually, a new fire station would replace the existing Fire Station 15. The design and construction of the future facilities would be scheduled once funding is identified. Therefore, at the program level of analysis provided in this PEIR, impacts related to the expansion of existing facilities or the construction of new facilities would be less than significant.

d. Libraries

As identified above, two libraries currently serve the Old Town community. Guidelines received from the Library Department in 2015 (see Appendix K) confirm that the City does not require the construction of any additional facilities to meet library service requirements of the proposed Old Town CPU. The approximately 25,000-square-foot new Mission Hills Branch Library is under construction and is anticipated to be completed by 2019, which would result in an exceedance of the recommended minimum branch library size requirement of 15,000 square feet. Therefore, since the project does not include the construction of library facilities and library facility needs would be met within the proposed Old Town CPU area with the project, impacts related to library facilities would be less than significant.

e. Schools

Student generation is based on housing units. For the Old Town community, based on Series 13 Forecast data from SANDAG for the year 2012, there are 445 existing dwelling units. An additional 960 residential units are estimated within the proposed CPU for a total of 1,405 units in 2035. Per correspondence with SDUSD (May 2017), student generation rates vary based on the type of project, number of units, bedroom mix, affordable or senior housing component, proximity to schools and other amenities, neighborhood, and other factors. There are no district standard or school-specific rates.

Typically, to provide student generation rates for a new project, SDUSD demographers would research similar nearby developments and their student generation rates as a guide for how many students a new project may generate. For the project, however, many factors are not yet determined, such as the specific type of housing and bedroom mix that may be constructed with the potential increase in housing stock at some future point in time. To estimate the number of students potentially generated by implementation of the proposed Old Town CPU, SDUSD demographers referenced the number of existing housing units in the Old Town community and the current number of students who reside in Old Town (based on SDUSD data), to determine the current Old Town community-wide student generation rates. This information is summarized in Table 5.11-3.

Housing Type	Number of Existing Units	2016–2017 Students (K–5, 6–8, 9–12, and K–12 total)	Student Generation Rate (per unit)
Single Family	151	K–5: 11	K–5: 0.073
		6–8: 9	6–8: 0.060
		9–12: 9	9–12: 0.060
		K–12: 29	K–12: 0.193
Multi Family	323	K–5: 10	K–5: 0.031
		6–8: 6	6–8: 0.019
		9–12: 7	9–12: 0.022
		K–12: 23	K–12: 0.072

Source: Appendix K

Based on the number of additional units estimated by the project and student generation rates included in Table 5.11-3, potential student generation in 2035 is shown in Table 5.11-4. The generation rates are shown as a range. The current generation rate is the low range and the high range is double the low range (current generation rate). A key assumption is that future additional housing units will generate students at a rate similar to current housing units; this is represented by the low range. If future additional housing units are significantly different from the current units in terms of student generation, the number of students could be higher, as indicated by the high range.

Housing Type	Number of Additional Units	Potential Student Generation Rates	Number of Potential Students
Single Family	None (80 units will remain, -71 from 2012 count of 151)	Not applicable	Not applicable
Multi Family	1,002	K-5: 0.031-0.062	K-5: 31-62
		6-8: 0.019-0.038	6-8: 19-38
		9-12: 0.022-0.044	9-12: 22-44
		K-12: 0.072-0.144	K-12: 72-144

Source: Appendix K

The SDUSD demographers indicated that the cumulative potential increase in students from the number of future additional housing units suggested in the project could likely impact district schools to the point of reaching capacity, particularly at Grant K-8 School. Therefore, new or expanded school facilities would likely be needed.

Government Code Section 65995 and Education Code Section 53080 authorize school districts to impose facility mitigation fees on new development to address any increased enrollment that may result. SB 50, enacted on August 27, 1998, significantly revised developer fee and mitigation procedures for school facilities as set forth in Government Code Section 65996. The legislation holds that an acceptable method of offsetting a project's effect on the adequacy of school facilities is payment of a school impact fee prior to issuance of a building permit. Once paid, the school impact fees would serve as mitigation for any project-related impacts to school facilities. As such, the City is legally prohibited from imposing any additional mitigation related to school facilities, as payment of the school impact fees constitutes full and complete mitigation. The school district will be responsible for potential expansion or development of new facilities. Therefore, impacts to schools resulting from future development would be less than significant through implementation of SB 50 (City of San Diego 2016).

5.11.4 Significance of Impacts

a. Police Protection

Regarding police protection, implementation of the project would result in an increase in overall population. However, the proposed increase in population would not require that San Diego Police Department expand or construct new facilities. Therefore, impacts related to the expansion/construction of new facilities would be less than significant, and no mitigation is required.

b. Parks and Recreation

Regarding park and recreational facilities, there is an existing deficit for an aquatic complex, which is an adverse impact but not considered a significant physical impact. Implementation of the project would provide policy support for expansions and improvements to the community's population-based parks and construction of the proposed shared aquatic complexes in neighboring communities, but do not propose design and construction of new facilities. Thus, implementation of the project would result in a less than significant impact related to parks and recreation, and no mitigation is required.

c. Fire/Life Safety Protection

Regarding fire/life safety protection, implementation of the project would result in an increase in overall population. No additional fire stations are planned within the Old Town community, but Fire Stations 8 and 20 located within Uptown and Midway-Pacific Highway, respectively, have plans for expansion and eventual new replacement facilities to meet current and future operational needs. In addition, Fire Station 15 located in Ocean Beach also has plans for expansion and an eventual new replacement facility. However, the proposed increase in population would not require that the Fire-Rescue Department expand or construct new facilities. Therefore, impacts related to the expansion/construction of new facilities would be less than significant, and no mitigation is required.

d. Libraries

Since the project does not include the construction of library facilities and facility needs would be met within the proposed CPU area, impacts related to library facilities would be less than significant, and no mitigation is required.

e. Schools

Regarding school facilities, future residential development that occurs in accordance with the project 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. Therefore, impacts to schools would be less than significant, and no mitigation is required.

5.11.5 Mitigation Framework

Impacts to police protection, parks and recreation facilities, fire/life safety protection, library services, and schools would be less than significant. Therefore, no mitigation is required.

5.12 Public Utilities

This section analyzes the impacts of the project on existing public utilities, including those for water supply, sewer, storm water, communications systems, and solid waste and recycling. This section includes a discussion of the Water Supply Assessment (WSA) prepared by the City's PUD (2017a), which is included as Appendix L to this PEIR.

5.12.1 Existing Conditions

A discussion of existing conditions for water supply, sewer, storm water, communications systems, and solid waste in the proposed Old Town CPU area is provided in Chapter 2.0. The existing regulatory framework is summarized in Chapter 4.0.

5.12.2 Significance Determination Thresholds

Based on the City's Significance Determination Thresholds, which have been adapted to guide a programmatic analysis of the project, impacts related to water supply, sewer, solid waste and recycling, and communications systems would be significant if the project would:

1. Result in the use of excessive amounts of water beyond projected available supplies;
2. Promote growth patterns resulting in the need for and/or provision of new or physically altered utilities, the construction of which could cause significant environmental impacts in order to maintain service ratios, or other performance objectives; or
3. Result in impacts to solid waste management, including the need for construction of new solid waste infrastructure including organics management, materials recovery facilities, and/or landfills; or result in a land use plan that would not promote the achievement of a 75 percent target for waste diversion and recycling as required under AB 341 and the City's Climate Action Plan.

5.12.3 Impact Analysis

Issue 1 Water Supply

Would the project use excessive amounts of water beyond projected available supplies?

A WSA was prepared for the project to assess whether sufficient water supplies are, or will be, available to meet the projected water demands of the project. Because no subdivision of land is proposed as part of this project, this WSA was prepared in compliance with the requirements of SB 610. The WSA includes, among other information, identification of existing water supply entitlements, water rights, water service contracts, or agreements relevant to the identified water supply for the proposed CPU, and

quantities of water received in prior years pursuant to those entitlements, rights, contracts, and agreements. The WSA evaluated 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 project.

The MWD and SDCWA have developed water supply plans to improve reliability and reduce dependence upon existing imported supplies. MWD's RUWMP and Integrated Water Resources Plan, and the SDCWA's 2015 UWMP and annual water supply report include water infrastructure projects that meet long-term supply needs through securing water from the State Water Project, Colorado River, local water supply development, and recycled water.

As discussed in the WSA, the City's 2015 UWMP demonstrates that there will be sufficient water supplies available to meet demands for existing and planned future developments that are projected to occur by 2040. Based on a normal water supply year, the estimated water supply projected in five-year increments for a 20-year projection will meet the City's projected water demand of 200,984 acre-feet in 2020; 242,038 acre-feet in 2025; 264,840 acre-feet in 2030; 273,748 acre-feet in 2035; and 273,408 acre-feet in 2040. Based on a single-dry year forecast, the estimated water supply will meet the projected water demand of 213,161 acre-feet in 2020; 256,883 acre-feet in 2025; 281,167 acre-feet in 2030; 290,654 acre-feet in 2035; and 290,292 acre-feet in 2040. Based on a multiple-dry year, third year supply, the estimated water supply will meet the projected demands of 208,665 acre-feet in 2020; 251,402 acre-feet in 2025; 275,139 acre-feet in 2030; 284,412 acre-feet in 2035; and 284,058 acre-feet in 2040.

As demonstrated in the WSA (City of San Diego 2017a; Appendix L), there is sufficient water planned to supply the proposed Old Town CPU's estimated annual average usage. The projected water demands of the project are 444,784 gallons per day (gpd) or 498.2 acre feet per year, as planned in the City's 2015 UWMP. As a result, the water demand resulting from the proposed Old Town CPU would result in no unforeseen demands.

In summary, the WSA concluded that the proposed Old Town CPU is consistent with the water demands assumptions included in the regional water resource planning documents of the SDCWA and MWD. Current and future water supplies, as well as the actions necessary to develop these supplies, have been identified in the water resources planning documents of the PUD, the SDCWA, and MWD to serve the projected demands of the proposed Old Town CPU area, in addition to existing and planned future water demand of the PUD. Therefore, impacts related to water supply would be less than significant.

Issue 2 Utilities

Would the project promote growth patterns resulting in the need for and/or provision of new or physically altered utilities, the construction of which could cause significant environmental impacts in order to maintain service ratios, or other performance objectives?

The General Plan calls for future growth to be focused into mixed-use activity centers linked to the regional transit system. Implementation of the proposed Old Town CPU would result in infill and redevelopment occurring within the proposed CPU area. The City's existing built areas are currently served by storm water, wastewater, and water infrastructure, and various communications systems; however, some of the City's built areas, including those within the Old Town community, have existing infrastructure deficiencies and would require capacity improvements to serve the existing and projected

population. The following is a program-level analysis of the significance of impacts for each applicable utility.

a. Storm Water

Because the proposed Old Town CPU area is highly impervious and there is limited land available for new development, the volume or rates of runoff are not likely to be increased by new development. It is more likely that the volume and rate of runoff could be slightly decreased due to implementation of current storm water quality regulations as new development occurs, which requires implementation of LID practices that retain a portion of storm water on-site for infiltration, re-use, or evaporation. Future projects would be required to exercise strict adherence to existing storm water regulations and conformance with General Plan and proposed CPU policies. Project-specific review under the Municipal Storm Water Permit would assure that significant adverse effects related to the storm water system and in the installation of storm water infrastructure would be avoided. Further, the SDMC requires that existing flows of a property proposed for development be maintained. Additional details regarding drainage patterns are provided in Section 5.7.3.

~~With implementation of the project there would be an increase in overall population, which could result in a need for installation of new storm water infrastructure. However,~~ In addition, no storm drains, or other community-wide drainage facilities, are proposed for construction in conjunction with implementation of the project. The location and extent of future storm water facilities is not known at this time; therefore, no impacts can be identified. Thus, impacts associated with storm water facilities as a result of the project would be less than significant.

b. Sewer

The potable sewer system is continually upgraded and repaired on an ongoing basis through the City's CIP. These improvements are determined based on continued monitoring by the Public Works Department (PWD) Engineering Division to determine remaining levels of condition or capacity. The PWD Engineering Division plans its capital improvement projects several years prior to pipelines actually reaching capacity. Such improvements would be required of the sewer system regardless of the implementation of the project.

The project does not propose any specific development but provides the framework for future growth. No new sewer collection or wastewater treatment facilities are proposed in conjunction with the project, and the location and extent of future facilities is not known at this time; therefore, no impacts can be identified. Thus, impacts associated with sewer facilities as a result of the project would be less than significant. Any future development would be required to comply with SDMC regulations regarding sewers and wastewater facilities (Chapter 6, Article 4) and would be required to follow the City's Sewer Design Guidelines.

c. Water Facilities

The potable water distribution system is continually upgraded and repaired on an ongoing basis through the City's CIP. These improvements are determined based on continued monitoring by the PWD Engineering Division to determine remaining levels of capacity. The PWD Engineering Division plans its

capital improvement projects several years prior to pipelines actually reaching capacity. Such improvements would be required of the water system regardless of implementation of the project.

As future development takes place in the proposed Old Town CPU area, demand for water is likely to increase and create a potential need to increase sizing of existing pipelines and mains. No new water distribution or treatment facilities are proposed in conjunction with the project, and the location and extent of future facilities is not known at this time; therefore, no impacts can be identified. Thus, impacts associated with water facilities as a result of the project would be less than significant.

d. Communications Systems

Private utility companies currently provide communications systems within the proposed Old Town CPU area. New development will likely result in the need for new communications systems; however, no specific communications systems upgrades are proposed with this project, and the location and extent of future facilities is not known at this time. Therefore, no impacts can be identified. Additionally, future siting of communications infrastructure would be in accordance with the LDC, including section 141.0420 regulating wireless communications facilities, as well as the City's Wireless Communications Facilities Guidelines, which seek to minimize visual impacts. Adhering to General Plan policies supporting the City's undergrounding program would also ensure that visual impacts of new facilities are minimized. Utilities undergrounding has occurred in portions of the Old Town community, and undergrounding of other portions of the community is currently planned. Any construction of communications systems associated with future development would occur in accordance with the City's permitting processes and construction standards to avoid or minimize impacts on environmentally sensitive habitat areas and landforms through siting, grading or excavation, and erosion. Therefore, impacts associated with the construction of future communications facilities from the project would be less than significant.

Issue 3 Solid Waste and Recycling

Would the project result in impacts to solid waste management, including the need for construction of new solid waste landfills; or result in a land use plan that would not promote the achievement of a 75 percent waste diversion as targeted in AB 341 and the City's Climate Action Plan?

The California Department of Resources Recycling and Recovery (CalRecycle) provides estimates of solid waste generation rates for different types of land uses. These rates estimate the amount of solid waste created by residences or businesses over a certain amount of time (day, year, etc.). Waste generation rates include all materials discarded, whether or not they are later recycled or disposed of in a landfill, since under state law the total amount of waste "generated" is considered to be the sum of the waste "disposed of" plus the waste "diverted" from disposal. Waste generation rates can be used to estimate the impact of new development on the local solid waste infrastructure, although it should be noted that impacts to solid waste infrastructure are not necessarily the amount of waste but whether any increase would require the development of new facilities. Since the majority of waste is managed through waste diversion, solid waste facilities include those necessary to provide composting, recycling, and other collection, separation, and diversion services. Furthermore, it is specifically the amount of waste remaining for disposal that is considered for compliance with the City's CAP and has the greatest potential for impacts associated with GHG emissions.

For the purposes of determining significance, solid waste disposal rates attributable to the project in 2035, was compared to the adopted Community Plan solid waste disposal rates. This comparison is appropriate because the solid waste disposal rate from the adopted Community Plan was used when developing the City's CAP GHG Inventory. Solid waste disposal rates are determined based on the types and amounts of land uses proposed under the adopted Community Plan and the project.

The project would result in a decrease in tons of solid waste disposed compared to the adopted Community Plan (see Appendix I). While density would increase under the project, decreases in certain types and amounts of land uses would cause an overall net decrease in solid waste generation. The largest decrease in solid waste generation comes from the expected reduction in some industrial land uses under the project. Nonetheless, future projects that could occur in the Old Town community with the implementation of the project would be required to comply with City regulations, including the City's Recycling Ordinance (updated December 2016). In addition, a WMP would be required for any project that exceeds the City's threshold, currently the generation of 60 or more tons of solid waste for projects of 40,000 square feet or more. The WMP shall include measures to provide sufficient interior and exterior storage space for refuse and recyclable materials, and measures to handle landscaping and green waste materials associated with the occupancy of the proposed development. In tandem with the WMP, all new development projects must comply with the City's Construction and Demolition Ordinance and Section 142.0801 et seq. of the LDC, which outlines the requirements for refuse and recyclable materials storage.

Despite the population growth assumed in the proposed CPU, no new solid waste disposal facilities have been identified. The General Plan addresses waste management in Policies PF-1.1 through PF-1.5, focusing on waste recycling and diversion of materials in PF-1.2, and the proposed Old Town CPU addresses waste management in Policies CE-1.10-1.11. The proposed Old Town CPU would result in a less than significant impact to existing recycling operations within the proposed Old Town CPU area and surrounding areas, and would not affect the City's overall ability to attain a 75 percent recycling target as required under AB 341. Additionally, the City has adopted a Zero Waste Plan, which would result in 70 percent waste diversion by 2020, 90 percent waste diversion by 2035, and 100 percent diversion by 2040. Furthermore, mandatory compliance with the SDMC and the City's Recycling Ordinance for all new development projects would continue to reduce solid waste generation/disposal and increase recycling efforts, thereby resulting in a less than significant impact.

5.12.4 Significance of Impacts

5.12.4.1 Water Supply

Based on the findings of the WSA, there is sufficient water supply to serve existing and projected demands of the project, and future water demands within the PUD's service area in normal and dry year forecasts during a 20-year projection. Therefore, no less than significant impacts to water supply are anticipated with implementation of the project. No mitigation is required.

5.12.4.2 Utilities

a. Storm Water

~~With implementation of the project, there would be an increase in overall population, which could result in a need for installation of new storm water infrastructure. However, future projects would comply with existing storm water regulations and conform with General Plan and proposed CPU policies. Project-specific review under the Municipal Storm Water Permit would assure significant adverse effects related to the storm water systems would be avoided. In addition, the proposed CPU does not identify any specific storm water infrastructure improvements that are proposed for construction in conjunction with implementation of the project, and the location and extent of future facilities is not known at this time; therefore, no impacts can be identified. no storm drains, or other community-wide drainage facilities, are proposed for construction in conjunction with implementation of the project. Thus, impacts associated with storm water facilities as a result of the project would be less than significant. No mitigation is required.~~

b. Sewer

~~Sewer line upgrades are administered by the PWD and are handled on a project-by-project basis. Because future development under the project would likely increase demand, there may be a need to increase sizing of existing pipelines and sewer mains. However, the proposed CPU does not identify any specific sewer infrastructure improvements that are proposed in conjunction with the project, and the location and extent of future facilities is not known at this time; therefore, no impacts can be identified. Thus, impacts associated with sewer facilities as a result of the project would be less than significant. No mitigation is required. The project does not propose any specific development but provides the framework for future growth. No new sewer collection or wastewater treatment facilities are proposed in conjunction with the project. Thus, impacts associated with sewer facilities as a result of the project would be less than significant. No mitigation is required.~~

c. Water Facilities

~~As future development takes place in the proposed CPU area, demand for water is likely to increase and create a potential need to increase sizing of existing pipelines, mains, and treatment facilities. However, the proposed CPU does not identify any specific water infrastructure improvements that are proposed in conjunction with the project, and the location and extent of future facilities is not known at this time; therefore, no impacts can be identified. Thus, impacts to water distribution and treatment facilities as a result of the project would be less than significant. No mitigation is required. No new water distribution or treatment facilities are proposed in conjunction with the project. Thus, impacts associated with water facilities as a result of the project would be less than significant. No mitigation is required.~~

d. Communications Systems

~~As future development takes place in the proposed CPU area, demand for communications systems is likely to increase and create a potential need for expansion of facilities. However, the proposed CPU does not identify any specific communications systems infrastructure improvements that are proposed in conjunction with the project, and the location and extent of future facilities is not known at this time; therefore, no impacts can be identified. Therefore, impacts to communications systems would be less~~

than significant, and no mitigation is required. ~~No specific communications systems upgrades are proposed with this project. Therefore, no impacts will occur, and no mitigation is required.~~

5.12.4.3 Solid Waste and Recycling

To ensure that waste generation and recycling efforts during construction and post-construction future land use occupancy and operation (i.e., residential, commercial, industrial, mixed-use, etc.) are addressed, a WMP shall be prepared for any future development of 40,000 square feet or more proposed under the project that may generate 60 tons of waste or more during construction and/or operation. Implementation of these WMPs would ensure that future development project impacts would be less than significant. Ministerial projects, and discretionary projects that would fall below the 60 ton threshold, would be required to comply with the SDMC sections addressing construction and demolition debris, waste and recyclable materials storage, and recyclable materials (and in the future, organic materials) collection. Therefore, at this program level of review, the project would not require increased landfill capacity, and impacts associated with solid waste would be less than significant. No mitigation is required.

5.12.5 Mitigation Framework

All impacts to public utilities would be less than significant; thus, no mitigation is required.

This page intentionally left blank.

5.13 Biological Resources

The following section describes the existing biological conditions within and adjacent to the proposed Old Town CPU area, identifies current applicable regulations, and evaluates potential biological resource impacts associated with implementation of the proposed Old Town CPU.

5.13.1 Existing Conditions

The Old Town Community Plan area is northwest of Downtown San Diego and consists of approximately 275 acres (about 0.5 square miles). The area is bounded on the north by I-8 and the Mission Valley community plan area, on the west by I-5 and the Midway-Pacific Highway Community Plan area, the Uptown community on the east, and on the south by I-5 and the Midway-Pacific Highway and Uptown communities. The Old Town community consists of low, flat land between the San Diego River and San Diego Bay and hilly terrain in and around Presidio Park. The proposed CPU area includes Presidio Park and the Old Town San Diego State Historic Park.

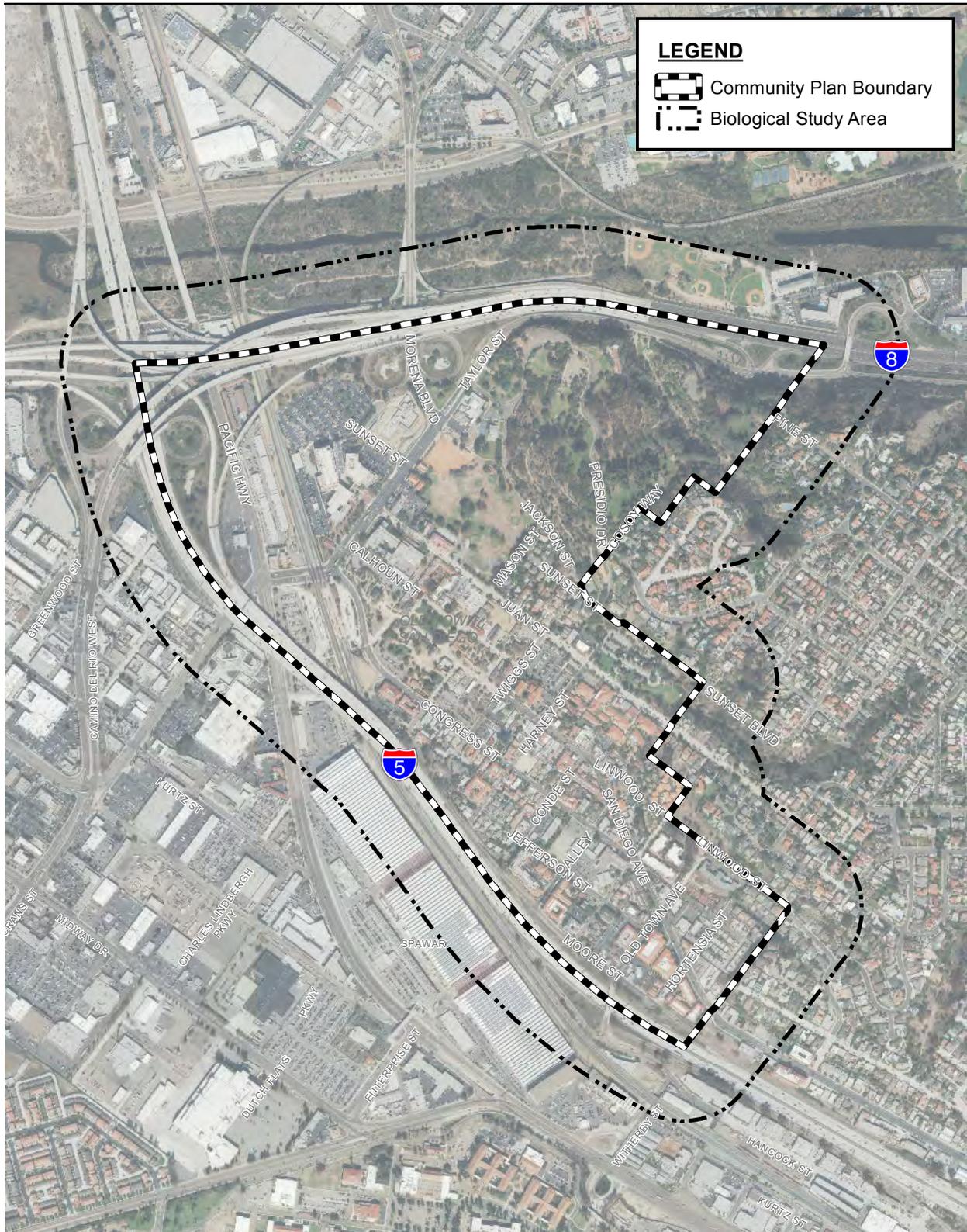
The proposed CPU area includes approximately 10.57 acre of Diegan coastal sage scrub, and over 37 acres of eucalyptus woodland within the proposed CPU area. In addition, the proposed CPU area abuts an additional 10 acres of DCSS to the east and nearly 28 acres of wetland habitat within the San Diego River to the north. Additional details regarding the existing environmental setting, which includes discussion and description of the sensitive biological resources and the regulatory framework, are summarized in Chapters 2.0 and 4.0, respectively.

5.13.1.1 Methodology

The analysis of biological resources for the proposed Old Town CPU area was performed at the plan level using existing databases and literature as cited in the sections below. No field work was conducted as part of the analysis of biological resources. The discussion of biological resources focuses on the proposed Old Town CPU area plus a 500-foot buffer, herein collectively referred to as the biological study area (BSA) (Figure 5.13-1).

The most current vegetation data available from the SanGIS-SANDAG Regional Data Warehouse (County of San Diego 2015) was used to describe existing vegetation communities and other cover types in the BSA. Vegetation communities and cover types are described in accordance with the *Draft Vegetation Communities of San Diego County* (Oberbauer et al. 2008), based on the *Preliminary Descriptions of the Terrestrial Natural Communities of California* (Holland 1986). Assessments of the sensitivity of habitats were based primarily on the CNPS (CNPS 2017), the CNDDDB (CDFW 2017), City of San Diego, USFWS, and Holland (1986).

Data from the CNDDDB (CDFW 2017) was used to provide information on potential sensitive plant and wildlife species occurrences. In addition, potential for sensitive species occurrence was evaluated based on examination of habitat in aerial photography and based on AECOM's knowledge of the region.



Source: SANDAG 2014; City of San Diego 2017

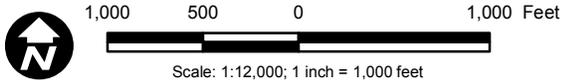


Figure 5.13-1
Biological Study Area

Old Town Community Plan Update PEIR

Path: P:_6044\60440144_MidOld_CPU\900-CAD-GIS\920 GIS\922_Maps\CommunityPlan\OldTown_BioStudyArea_85x11.mxd, 7/19/2017, augellop

Sensitive species are plant and wildlife species that have been afforded protection or special recognition by federal, state, or local resource agencies or organizations. Sensitive species typically have relatively limited distribution and may require specialized habitat conditions. For the purposes of this report, species were considered sensitive if they met at least one of the following criteria:

- Listed or proposed for listing (including candidate species²) under the federal Endangered Species Act (FESA) and California Endangered Species Act (CESA).
- CDFW Species of Special Concern.
- CDFW Fully Protected species.
- CRPR species (formerly CNPS listed species³): CRPR 1A (presumed extinct in California and rare/extinct elsewhere), 1B (rare, threatened, and endangered in California and elsewhere), 2A (presumed extinct in California, but more common elsewhere), 2B (rare, threatened, or endangered in California, but more common elsewhere), or 3 (plants are those for which more information is needed [a review list]) (CNPS 2015). All plants constituting CRPR 1A, 1B, 2A, 2B, and 3 meet the definitions of Sections 2062 and 2067 (CESA) of the California Fish and Game Code.
- Some (as specified in CNDDDB), but not all, CRPR 4 plant species meet the definitions of Sections 2062 and 2067 (CESA) of the California Fish and Game Code (CNPS 2015). CRPR 4 plants are those of limited distribution (watch list) (CNPS 2015).
- Species covered by the City of San Diego MSCP (includes narrow endemics) and considered sensitive by the San Diego SDMC (City of San Diego 2012).

5.13.2 Significance Determination Thresholds

Based on the City's CEQA Significance Determination Thresholds (City of San Diego 2016), which have been adapted to guide a programmatic analysis for the project impacts on biological resources would be significant if the project would result in:

1. A substantial adverse impact, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in the MSCP or other local or regional plans, policies or regulations, or by CDFW or USFWS;
2. A substantial adverse impact on any Tier I Habitats, Tier II Habitats, Tier IIIA Habitats, or Tier IIIB Habitats as identified in the Biology Guidelines of the Land Development Manual or other

² Candidate species are those petitioned species that are actively being considered for listing under the federal Endangered Species Act (ESA), as well as those species for which the U.S. Fish and Wildlife Service (USFWS) has initiated an ESA status review, as announced in the Federal Register. Proposed species are those candidate species that warrant listing as determined by USFWS and have been officially proposed for listing in the Federal Register. Under the California Endangered Species Act, candidate species are those species currently petitioned for state-listing status.

³ In 2010, CDFW changed the name of the CNPS Lists in its publications to "California Rare Plant Rank." The change was intended to correct a public misimpression that the CNPS was solely responsible for the rank assignments. Rare Plant Status Review groups (300+ botanical experts from government, academia, non-governmental organizations, and the private sector) produce the rank assignments for rare plants and both CDFW and CNPS jointly manage this collaborative effort.

sensitive natural community identified in local or regional plans, policies, regulations, or by the CDFW or USFWS;

3. A substantial adverse impact on wetlands (including, but not limited to, marsh, vernal pool, riparian, etc.) through direct removal, filling, hydrological interruption, or other means;
4. Interfering substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, including linkages identified in the MSCP Plan, or impede the use of native wildlife nursery sites; or
5. A conflict with the provisions of an adopted Habitat Conservation Plan, Natural Conservation Community Plan, or other approved local, regional, or State habitat conservation plan, either within the MSCP plan area or in the surrounding region;

5.13.3 Impact Analysis

This section discusses potential impacts associated with the proposed Old Town CPU relative to biological resources. The impact analysis is based on the existing conditions provided in Section 2.3.13. The proposed Old Town CPU places emphasis on directing growth into mixed-use activity centers that are pedestrian-friendly and linked to an improved regional transit system, and improving existing parks and recreation facilities to serve the needs of the projected future residents of the community. The proposed Old Town CPU proposes future development and growth outside the River Influence Area of the City of San Diego's San Diego River Master Plan. The River Influence Area is defined as areas within 200 feet of the River Corridor Area. The River Corridor Area is defined as all areas within 35 feet of Federal Emergency Management Agency 100-year floodway. No new construction or construction staging would occur within 235 feet of the 100-year floodway for the San Diego River. Within Presidio Park, the proposed Old Town CPU proposes trail improvements, predominantly along currently existing trails. Direct and indirect impacts are only anticipated to occur within currently developed areas.

Biological resources may be either directly or indirectly impacted by growth and development associated with implementation of the proposed Old Town CPU. Furthermore, direct and indirect impacts may be either permanent or temporary in nature. These various types of impacts are defined below per the City's CEQA Significance Determination Thresholds guidance document (City of San Diego 2016).

Direct: A direct impact is a physical change in the environment which is caused by and immediately related to the project. Direct impacts are caused by a project and occur at the same time and place as the project.

Indirect: An indirect impact is a physical change in the environment which is not immediately related to the project, but which is caused indirectly by the project. If a direct impact in turn causes another physical change in the environment, then the secondary change is an indirect impact. An indirect physical change is to be considered only if that change is a reasonably foreseeable impact which may be caused by the project. A change which is speculative or unlikely to occur is not reasonably foreseeable.

The City's Biology Guidelines require that the impact discussion include an analysis of direct impacts, indirect impacts, and cumulative impacts (City of San Diego 2012). The significance of both direct and indirect impacts is determined based on the City's Significance Determination Thresholds (City of San Diego 2016).

Few direct impacts from the proposed Old Town CPU are anticipated to occur in areas that are already highly developed. Indirect impacts may occur as a result of the increased growth and activity within developed and/or redeveloped areas. The extent of impacts varies by species and biological resource. Potential impacts could include the following.

Loss of Native Habitat or Habitat Used by Sensitive Species: Remnant areas of native habitat and Eucalyptus woodland within the proposed CPU area (i.e., Presidio Park) could be subject to new or updated trail impacts, new or upgraded utility lines, and access easements and other similar projects in areas that may have native habitats or otherwise non-sensitive habitat that supports sensitive species.

Noise: Elevated ambient noise levels that could result from development associated with the proposed Old Town CPU's implementation, could impact species that rely on sound to communicate (e.g., birds). Elevated ambient noise levels have potential to disturb species and/or cause direct habitat avoidance. The impact of noise on wildlife differs from species to species, and is dependent on the source of the noise (e.g., vehicle traffic versus blasting) and the decibel level, duration, and timing. These impacts could occur during construction or from completed projects.

Changes in Hydrology: Changes in hydrology, runoff, and sedimentation resulting from the proposed Old Town CPU could (i.e., during construction) have direct or indirect impacts on species dependent on surface water and on native habitat.

Exotic and Predator Species: The introduction of exotic plant and animal species to MHPA areas adjacent to the proposed Old Town CPU would be considered a potential indirect impact as such species have few natural predators or other ecological controls on their population sizes, and they often thrive in disturbed habitats. Exotic plant and wildlife species may aggressively outcompete or predate on native species.

Lighting: Artificial night lighting associated with the proposed Old Town CPU could impact habitat value for some species, particularly for nocturnal species, through potential modification of predation rates, obscuring of lunar cycles, and/or causing direct habitat avoidance. Nighttime lighting could also disturb diurnal species roosting in adjacent habitat.

Fugitive Dust: Fugitive dust generated during development associated with implementation of the proposed Old Town CPU could adversely impact plants by coating the surfaces of the leaves and reducing the rates of metabolic processes, such as photosynthesis and respiration.

Unauthorized Access: Development associated with implementation of the proposed Old Town CPU could create or increase use of habitats that otherwise were not easily accessible to humans. Disturbance from human activities (i.e., trampling of species from recreational activity) and trash left by human activities can adversely impact species and degrade habitat.

Issue 1 Sensitive Species

Would the project result in a substantial adverse impact, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in the MSCP or other local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife (CDFW) or U.S. Fish and Wildlife Service (USFWS)?

Sensitive terrestrial wildlife or sensitive plant species have low or no potential to occur within areas of the proposed Old Town CPU that will experience growth and development. Remnant areas of native habitat and Eucalyptus woodland within Presidio Park could be subject to trail impacts or utility upgrades and other similar projects and may have, but are not expected to have, sensitive species. Ornamental trees could be removed during development and have the potential to support nesting avian species, including rare and common species protected under the MBTA and CA Code 3503.

Although the San Diego River is adjacent to the proposed Old Town CPU, development and growth would be located south of I-8, and therefore, species inhabiting the San Diego River north of I-8 would not be indirectly impacted by activities associated with the proposed Old Town CPU.

Potentially occurring sensitive species would be protected in accordance with applicable federal, state, and local regulations per the City's Biology Guidelines, and the provisions of the MSCP Subarea Plan. In addition, the MBTA, which is enforced by USFWS, makes it unlawful "by any means or in any manner, to pursue, hunt, take, capture, [or] kill" any migratory bird or attempt such actions, except as permitted by regulation; CDFW also requires compliance with CA Code 3503. Thus, there is an existing regulatory framework in place to prevent adverse impacts to native birds. Additionally, future discretionary development occurring within the proposed Old Town CPU area that has the potential to impact sensitive species would be subject to subsequent CEQA review and required to avoid and or mitigate for impacts to any sensitive species per applicable local, state and federal law. In addition, pre-construction nest survey would be required if construction would occur in potential or known habitat during the typical bird breeding season (February 1 through September 15) to determine the presence or absence of breeding birds and to ensure that no impacts occur to any nesting birds or their eggs, chicks, or nests. Thus, impacts to sensitive species resulting from the proposed Old Town CPU area would be less than significant.

Issue 2 Sensitive Habitats

Would the project result in a substantial adverse impact on any Tier I Habitats, Tier II Habitats, Tier IIIA Habitats, or Tier IIIB Habitats, as identified in the Biology Guidelines of the Land Development Manual, or other sensitive natural community identified in local or regional plans, policies, regulations, or by the CDFW or USFWS?

The areas that will experience the most growth and development in the proposed Old Town CPU area are already developed and do not support sensitive habitats other than those that may host sensitive animal species. Remnant areas of native habitat and Eucalyptus woodland within Presidio Park could be subject to trail impacts or utility upgrades and other similar projects and may have, but are not expected to have, sensitive species. Implementation of the project would impact primarily disturbed land and urban/developed land, which are not considered sensitive vegetation communities. Eucalyptus woodland

(nonnative) within Presidio Park occurs adjacent to developed areas within the proposed Old Town CPU. This habitat is a Tier IV vegetation community and is not considered sensitive. Although the San Diego River is adjacent to the proposed Old Town CPU, development and growth will be located south of I-8, and vegetation communities along the San Diego River, north of I-8, would not be indirectly impacted by activities associated with the proposed Old Town CPU.

For utility and other projects that may occur in the remnant habitats and habitats supporting sensitive species, further CEQA review would be required and compliance with local (including City ESL regulations and MSCP Subarea Plan), state, and federal regulations would be applied as applicable. Thus, impacts to sensitive habitats resulting from the proposed Old Town CPU would be less than significant

Issue 3 Wetlands

Would the project result in a substantial adverse impact on wetlands (including, but not limited to, marsh, vernal pool, riparian, etc.) through direct removal, filling, hydrological interruption, or other means?

There are no wetland habitats in the proposed Old Town CPU area; therefore, no direct impacts to wetlands would likely occur with implementation of the proposed Old Town CPU. The BSA (included in the proposed CPU and 500-foot buffer) does contain more than 20 acres of wetland habitat, and therefore, indirect impacts to wetland habitats and species could occur and would be mitigated on a case by case basis should impacts not be fully avoidable. Projects with such potential to cause indirect impacts to wetlands would be subject to additional CEQA review and application of all applicable local, state and federal regulations. Therefore, impacts to wetlands would be less than significant.

Issue 4 Wildlife Corridors and Nursery Sites

Would the project interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, including linkages identified in the MSCP Plan, or impede the use of native wildlife nursery sites?

The proposed Old Town CPU growth and development areas are primarily developed, and therefore, no direct impacts would likely occur to migratory or local native species. Remnant areas of native habitat and Eucalyptus woodland within Presidio Park could be subject to trail impacts or utility upgrades and other similar projects and may have roosting and nesting areas for sensitive species such as herons, which utilize the adjacent San Diego River, north of I-8, as a feeding area. The San Diego River itself also functions as a local and regional wildlife corridor; however, remnant habitat within the proposed CPU area only serves to facilitate local wildlife movement. Direct impacts could occur to nursery sites within the proposed CPU area; however, indirect impacts to the wildlife corridor and nursery sites within the San Diego River are not expected to occur with CPU implementation.

The existing eucalyptus woodland in the CPU area is mainly adjacent to existing noise sources and lighting from developed areas. Exotic species in the form of ornamental plants are also present within the area, and Presidio Park is open to public access. The growth and development within already developed areas of the proposed Old Town CPU are not expected to increase indirect impacts to species using the eucalyptus woodland at Presidio Park for movement; however, trail and utility projects within the remnant

areas could result in direct and indirect impacts to local wildlife corridors and nursery sites, and such projects would be subject to subsequent project specific CEQA review and appropriate application of local, state, and federal regulations. Therefore, impacts to wildlife corridors resulting from the project would be less than significant.

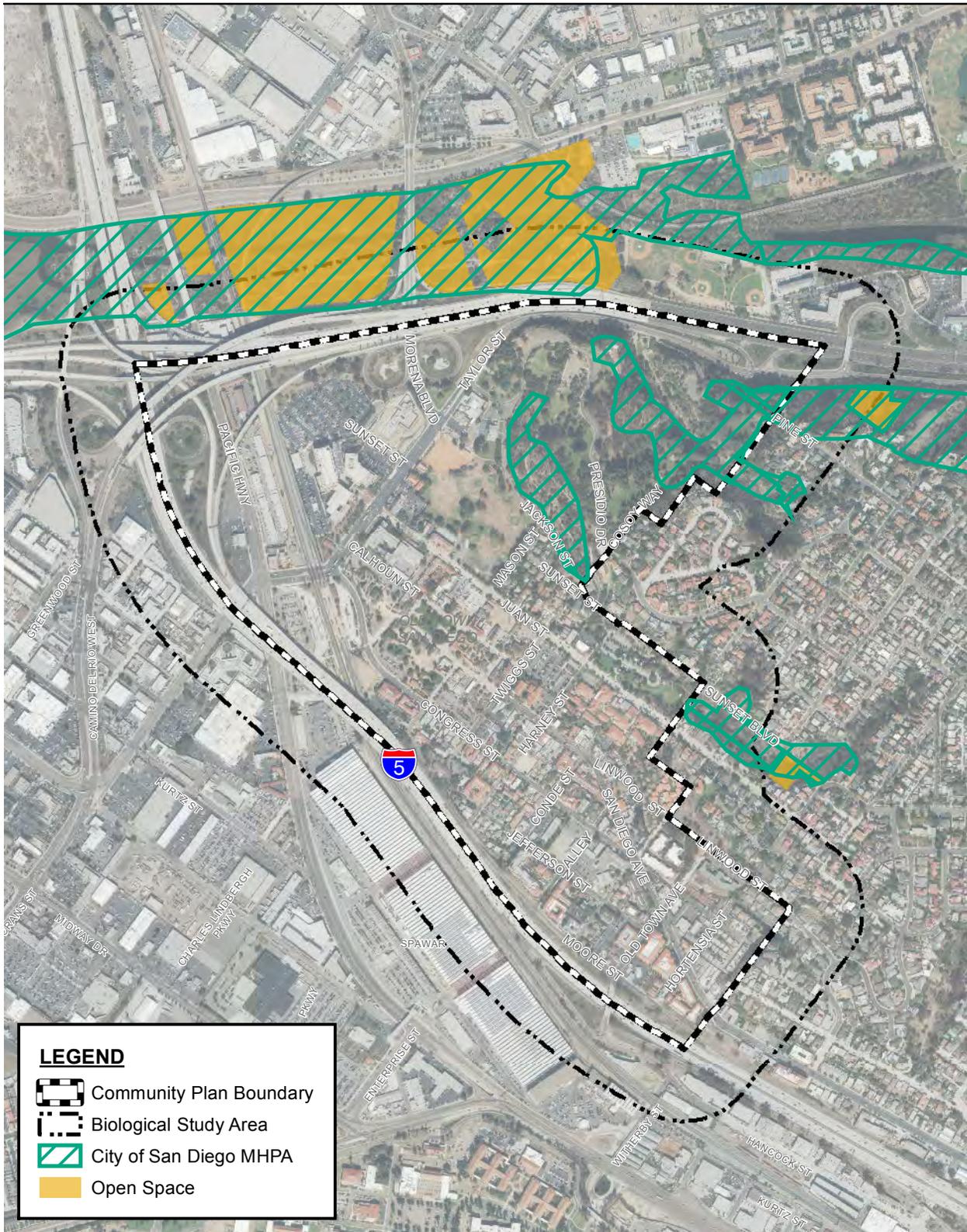
Issue 5 Multiple Species Conservation Program

Would the project result in a conflict with the provisions of an adopted Habitat Conservation Plan, Natural Conservation Community Plan, or other approved local, regional, or State habitat conservation plan, either within the MSCP plan area or in the surrounding region?

~~Only one~~ Multiple portions of the City's MHPA ~~occurs~~ are mapped within the proposed CPU area boundaries, specifically within Presidio Park which is open to public access, and therefore, direct and indirect impacts would likely be limited to rare cases where MSCP covered species or their habitat would be directly or indirectly impacted resulting from trail, or utility, and/or park improvement projects (Figure 5.13-2).

~~There is an~~ Portions of the City's MHPA occur north of I-8; however, as described in Chapter 3, Project Description, development and growth implemented in accordance with the CPU will be located occur south of I-8. Indirect impacts associated with development and growth in the proposed Old Town CPU area would not extend north of I-8. One section of the MHPA within Presidio Park occurs south and east of the Serra Museum, and into the adjacent Palm Canyon; while another area mapped in the southerly section of the park consists ~~There is also an MHPA in the form of eucalyptus woodland (nonnative) within Presidio Park that occurs adjacent to developed areas along Jackson Street within the proposed Old Town CPU. The MHPA in Presidio Park is adjacent to~~ with existing noise sources and lighting ~~from developed areas~~. Exotic species in the form of ornamental plants are also present within the MHPA and are considered to be part of the historical fabric of, and Presidio Park is open to public access. Adjacency Indirect effects ~~considered from adjacent land uses~~ include those due to increased storm water runoff; urban edge effects (trampling, pet predation; and removal of plant cover due to hiking, biking and other human activities); increased presence of toxins; increased nighttime light levels; redirection or blockage of wildlife movement; and increased levels of nonnative and invasive plants. These indirect effects could reduce the quality of the MHPA.

The City's MHPA Land Use Adjacency Guidelines (Section 1.4.3 of the MSCP) address requirements for grading and land development, including drainage, toxic substances in runoff; lighting, barriers, invasive plant species, brush management, and noise. Subsequent projects within or adjacent to the MHPA implemented in accordance with the CPU, and would be evoked for future project specific development proposals in or adjacent to the MHPA per LDC code requirements, required to comply with the Land Use Adjacency Guidelines and demonstrate compliance during project review and through the environmental review process. Additionally, subsequent projects within Presidio Park would be required to demonstrate compliance with the policies in the Conservation Element of the CPU, as well as any applicable guidelines for urban areas outlined in Section 1.2.3, applicable land use considerations outlined in Section 1.4.1, and the General Management Directives outlined in Section 1.5.2 of the MSCP Subarea Plan.



Source: SANDAG 2014; City of San Diego 2003, 2017

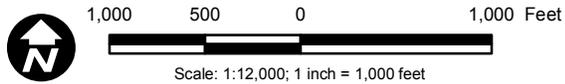


Figure 5.13-2
MHPA and Open Space Areas

Future development proposals with the potential to impact MSCP covered species and habitats located in or adjacent to the MHPA would be subject to subsequent CEQA review and appropriate application of applicable local, state and federal law. Potential direct and indirect impacts would be reviewed for addressed in compliance with the City's MSCP Subarea Plan, ESL Regulations, and MHPA Land Use Adjacency Guidelines. Required avoidance and/or mitigation would be ensured via inclusion of applicable measures in a project-specific CEQA MMRP, and/or inclusion of conditions in a discretionary permit, and/or as required ministerial project features.

The Project would therefore comply with all approved local, regional, state, and federal regulations, policies, ordinances, and all ~~finalized~~ Habitat Conservation Plans or Natural Conservation Community Plans. Furthermore, proposed policies in the Conservation Element of the proposed Old Town CPU would support existing ~~protections~~ MSCP Subarea Plan management considerations for MHPA lands. Thus, impacts would be less than significant.

5.13.4 Significance of Impacts

5.13.4.1 Sensitive Species

Implementation of the project would result in land use changes that would affect primarily developed areas; therefore, impacts to sensitive species are not anticipated. If potential impacts are identified, the regulatory framework in place per local, state and federal law would be evoked as applicable with future project specific development proposals. Impacts to wildlife species would ~~therefore not occur~~ be less than significant, and no mitigation is required.

5.13.4.2 Sensitive Habitats

Implementation of the project would result in land use changes that would affect primarily developed areas; therefore, impacts to sensitive habitats are not anticipated. If potential impacts are identified, the regulatory framework in place per local, state and federal law would be evoked as applicable with future project specific development proposals. Impacts to sensitive habitats or species would be less than significant, and no mitigation is required.

5.13.4.3 Wetlands

Implementation of the project would not result in impacts to wetlands (riparian scrub), as areas where this habitat occurs are outside of the proposed CPU area. No impacts to wetlands are expected; therefore, impacts would be less than significant, and no mitigation is required.

5.13.4.4 Wildlife Corridors and Nursery Sites

The proposed CPU area does not include wildlife corridors; thus, no impact to wildlife corridors would occur. In addition, wildlife corridors adjacent to the proposed CPU area would not be impacted, Therefore, impacts would be less than significant, and no mitigation is required.

5.13.4.5 Multiple Species Conservation Program

The project would be carried out consistent with the City's MSCP Sub-area Plan, including Section 1.4.3 MHPA Land Use Adjacency Guidelines and SDMC/LDC regulations including Section 142.0740) requirements relative to lighting adjacent to the MHPA. Additionally, in complying with the MHPA Land Use Adjacency Guidelines requirements, discretionary and ministerial site plans (including landscape plans) for future projects would require that; grading would not impact environmentally sensitive land, potential runoff would not drain into MHPA land, toxic materials used on a development would not impact adjacent sensitive land, development includes appropriate barriers/signage that would reduce noise impacts, predation by domestic animals and human encroachment would not occur, and landscaping does not contain potentially invasive species. In addition, the MHPA Land Use Adjacency Guidelines directs development so that any brush management activities are minimized within the MHPA, and contains requirements to reduce potential noise impacts to listed avian species. Further, the inclusion of a policy in the Conservation Element of the proposed CPU supporting MHPA habitat restoration efforts is consistent with the City's MSCP Subarea Plan management objective 3 "[t]o enhance and restore, where feasible, the full range of native plant associations in strategic locations and functional wildlife connections to adjoining habitat in order to provide viable wildlife and sensitive species habitat. Compliance with the City's MSCP Subarea Plan and MHPA Land Use Adjacency Guidelines, permit conditions for bird surveys, and adherence to the policies in the Conservation Element of the proposed CPU would reduce potential impacts of the project to less than significant.

5.13.5 Mitigation Framework

All impacts to biological resources would be less than significant; thus, no mitigation is required.

This page intentionally left blank.

5.14 Paleontological Resources

The analysis presented in this section evaluates the potential for impacts to paleontological resources based on existing geologic formations that underlay the proposed CPU area. Refer to Section 5.4, Geologic Conditions, for a discussion of the geologic formations that could be affected by the project (see Figure 2-4). The following analysis is based on a review of available literature, including the Paleontological Resource Assessment, Old Town San Diego and Midway-Pacific Highway Community Plan Updates, City of San Diego, San Diego County, California [Paleontological Resource Assessment (2013)]; the City's General Plan; Kennedy and Tan maps; the City's Paleontology Guidelines; and the publication of Paleontological Resources, County of San Diego by Deméré and Walsh (1994). The Paleontological Resource Assessment is included in this PEIR as Appendix M.

5.14.1 Existing Conditions

The existing environmental setting and regulatory framework are summarized in Chapters 2.0 and 4.0, respectively. As described in the Chapter 2.0, Environmental Setting (Section 2.3.4, Geologic Conditions and 2.3.14, Paleontology), of this draft PEIR, the proposed CPU area is underlain by the Bay Point, Scripps, Lindavista, and San Diego formations, which are assigned high paleontological resource sensitivity, with the exception of the Lindavista Formation, which has a moderate resource sensitivity. Refer to Section 2.3.14 for additional discussion of the existing setting for paleontological resources and sensitivity ratings.

5.14.2 Significance Determination Thresholds

The City of San Diego's CEQA Significance Determination Thresholds provides guidance to determine potential significance to paleontological resources. Based on the City's thresholds, a significant impact related to paleontological resources would occur if the project would:

1. Result in development that requires:
 - Over 1,000 cubic yards of excavation in a high resource potential geologic deposit/formation/rock unit.
 - Over 2,000 cubic yards of excavation in a moderate resource potential geologic deposit/formation/rock unit.

The City's CEQA Significance Determination Thresholds includes a Paleontological Monitoring Determination Matrix that is included in Table 2-10 of Section 2.3.14 of this PEIR. Additionally, the thresholds provide the following additional guidance for determining significance:

- If there are sedimentary rocks such as those found in the coastal areas, they usually contain fossils.

- If there are granitic or volcanic rocks such as those found in the inland areas, they usually will not contain fossils.

5.14.3 Impact Analysis

Issue 1 Paleontological Resources

Would the project result in development that requires over 1,000 cubic yards of excavation in a high resource potential geologic deposit/formation/rock unit or over 2,000 cubic yards of excavation in a moderate resource potential geologic deposit/formation/rock unit?

Fossils are the remains of prehistoric animal and plant life, and they are considered nonrenewable. Because human understanding of history is obtained, in part, through the discovery and analysis of paleontological resources, impacts of activities that excavate or grade geologic formations that could contain fossil resources would be significant. According to the Paleontological Resources Analysis, the Old Town CPU area is dominated by artificial fill and Quaternary alluvium to varying depths. Artificial fill materials are largely derived from earlier construction activities and do not contain any fossils of paleontological interest. Along the northeastern margin of the CPU area the Scripps Formation is overlain by the Bay Point Formation, and the San Diego formation, which are considered high sensitivity for fossil resources, is overlain by the Lindavista Formation, which is considered moderate sensitivity for fossil resources.

Grading associated with future development projects implemented in accordance with the project that involves excavation into the underlying geological formations could expose these formations and associated fossil remains. These development projects could destroy paleontological resources if the fossil remains are not recovered and salvaged. In addition, future projects proposing shallow grading where formations are exposed and where fossil localities have already been identified would also result in a significant impact. While the Old Town CPU area is dominated by artificial fill with no potential to uncover paleontological resources, the Bay Point, San Diego and Scripps formations have high resource sensitivity where fossils could be uncovered during future construction-related activities and the Linda Vista Formation is considered moderate sensitivity. Thus, impacts resulting from future discretionary construction-related activities into high and moderate sensitivity formations would be potentially significant (**Impact 5.14-1**).

Build-out of future ministerial projects implemented in accordance with the project would likely result in a certain amount of disturbance to the native bedrock within the proposed CPU area. Since ministerial projects are not subject to a discretionary review process, there would be no mechanism to screen for grading quantities and geologic formation sensitivity and apply appropriate requirements for paleontological monitoring. Thus, impacts related to future ministerial development that would occur with the proposed CPU would be potentially significant (**Impact 5.14-2**).

Impact 5.14-1: Grading activities associated with future discretionary projects that require grading in excess of 1,000 cubic yards, extending to a depth of 10 feet or greater into high sensitivity formations, or that require grading in excess of 2,000 cubic yards, extending to a depth of 10 feet or greater into moderate sensitivity formations, could result in significant impacts to paleontological resources.

Impact 5.14-2: Grading activities associated with future ministerial projects that require grading in excess of 1,000 cubic yards, extending to a depth of 10 feet or greater into high sensitivity formations, or that require grading in excess of 2,000 cubic yards, extending to a depth of 10 feet or greater into moderate sensitivity formations, could result in significant impacts to paleontological resources.

5.14.4 Significance of Impacts

The proposed Old Town CPU area is underlain by the Bay Point, San Diego, and Scripps formations, which are all assigned a high paleontological resource sensitivity, and the Lindavista Formation which is assigned a moderate paleontological resources sensitivity. Because of high sensitivity for paleontological resources within the Bay Point, San Diego, and Scripps formations and moderate sensitivity for paleontological resources within the Lindavista Formation, grading into these formations could potentially destroy fossil resources. Therefore, implementation of future discretionary and ministerial projects within the proposed CPU area within these formations has the potential to result in significant impacts to paleontological resources.

5.14.5 Mitigation Framework

To reduce the potential adverse impact to paleontological resources associated with discretionary projects, the project would incorporate the mitigation measure identified in the General Plan PEIR addressing paleontological resource impacts.

The following measure would apply to any discretionary project that proposes subsurface disturbance within a high or moderate sensitivity formation. If no subsurface disturbance is planned, then paleontological resources would not be impacted and development of a project-specific paleontological monitoring and discovery treatment plan would not be necessary. The following mitigation measure would reduce **Impact 5.14-1** to below a level of significance.

PALEO 5.14-1 Paleontological Review and Monitoring

Prior to the approval of subsequent discretionary development projects implemented in accordance with the proposed CPU, the City shall determine the potential for impacts to paleontological resources within a high or moderate sensitivity formation based on review of the project application submitted and recommendations of a project-level analysis completed in accordance with the steps presented below. Future projects shall be sited and designed to minimize impacts on paleontological resources in accordance with the City's Paleontology Guidelines and CEQA Significance Determination Thresholds. Monitoring for paleontological resources required during construction activities shall be implemented at the project level and shall provide mitigation for the loss of important fossil remains with future subsequent development projects that are subject to environmental review.

- I. Prior to Project Approval
 - A. The environmental analyst shall complete a project-level analysis of potential impacts on paleontological resources. The analysis shall include a review of the applicable United States

Geological Survey Quad maps to identify the underlying geologic formations, and shall determine if construction of a project would:

- Require over 1,000 cubic yards of excavation and/or a 10-foot, or greater, depth in a high resources potential geologic deposit/formation/rock unit.
 - Require over 2,000 cubic yards of excavation and/or a 10-foot, or greater, depth in a moderate resource potential geologic deposit/formation/rock unit.
 - Require construction within a known fossil location or fossil recovery site. Resource potential within a formation is based on the Paleontological Monitoring Determination Matrix.
- B. If construction of a project would occur within a formation with a moderate to high resource potential, monitoring during construction would be required and any identified resources shall be recovered.
- Monitoring is always required when grading on a fossil recovery site or a known fossil location.
 - Monitoring may also be needed at shallower depths if fossil resources are present or likely to be present after review of source materials or consultation with an expert in fossil resources (e.g., the San Diego Natural History Museum).
 - Monitoring may be required for shallow grading (<10 feet) when a site has previously been graded, and/or unweathered geologic deposits/formations/rock units are present at the surface.
 - Monitoring is not required when grading documented artificial fill. When it has been determined that a future project has the potential to impact a geologic formation with a high or moderate fossil sensitivity rating, a Paleontological Mitigation Monitoring and Reporting Program shall be implemented during construction grading activities.

5.14.6 Significance of Impacts after Mitigation

All future discretionary projects that would occur as a result of the project would be required to comply with **PALEO 5.14-1**. Implementation of mitigation measure **PALEO 5.14-1** would reduce paleontological impacts associated with future discretionary development to below a level of significance.

Future ministerial projects proposed in conformance with the project would also likely result in a certain amount of disturbance to the native bedrock within the study area. Since ministerial projects are not subject to a discretionary review process, there would be no mechanism to screen for grading quantities and geologic formation sensitivity and apply appropriate requirements for paleontological monitoring. Thus, impacts related to future ministerial development that would occur with development of the project (**Impact 5.14-2**) would remain significant and unavoidable.



Chapter 6.0 Cumulative Impacts

6.1 Introduction

Section 15355 of the CEQA Guidelines defines cumulative impacts as “two or more individual effects which, when considered together, are considerable or which compound or increase other environmental impacts.” These individual effects may entail changes resulting from a single project or from a number of separate projects. The cumulative impact from several projects is the change in the environment that results from the incremental impact of the proposed project when added to other past, present, and reasonably foreseeable probable future projects. Cumulative impacts can result from individually minor but collectively significant projects occurring over a period of time.

Section 15130 of the CEQA Guidelines requires that an EIR discuss the cumulative impacts of a project when the project’s incremental effect would potentially be cumulatively considerable. Cumulatively considerable, as defined in Section 15065(a)(3), means that the incremental effects of the individual project are considerable when viewed in connection with the effects of past projects, other current projects, and the effects of probable future projects. Where a lead agency determines the project’s incremental effect would not be cumulatively considerable, a brief description of the basis for such a conclusion must be included. In addition, the CEQA Guidelines allow for a project’s contribution to be rendered less than cumulatively considerable with implementation of appropriate mitigation.

According to Section 15130(b) of the CEQA Guidelines, the discussion of cumulative impacts “...need not provide as great detail as is provided for the effects attributable to the project alone. The discussion should be guided by the standards of practicality and reasonableness.” Additionally, one of the following two possible approaches is required for considering cumulative effects:

- A list of past, present, and probable future projects producing related or cumulative impacts, including, if necessary, those projects outside the control of the agency; or
- A summary of projections contained in an adopted general plan or related planning document, or in a prior environmental document which has been adopted or certified, which described or

evaluated region- or area-wide conditions contributing to the cumulative impact. Any such planning document shall be referenced and made available to the public at a location specified by the lead agency.

Pursuant to Section 15130(d), cumulative impact discussions may rely on previously approved land use documents such as general plans, specific plans, and local coastal plans, and may be incorporated by reference. In addition, no further cumulative impact analysis is required when a project is consistent with such plans, and the lead agency determines that the regional or area-wide cumulative impacts of the project have already been adequately addressed in a certified EIR for that plan.

Section 15130(e) also states that “If a cumulative impact was adequately addressed in a prior EIR for a community plan, zoning action, or general plan, and the project is consistent with that plan or action, then an EIR for such a project should not further analyze that cumulative impact, as provided in Section 15183(j).”

The cumulative impacts assessment in this section primarily relies on the cumulative impact determinations in the City of San Diego General Plan PEIR. The following issues were identified as cumulatively significant in the General Plan PEIR: agricultural resources, air quality, biological resources, geologic conditions, health and safety, historical resources, hydrology, land use, mineral resources, noise, paleontological resources, population and housing, public services and facilities, public utilities, traffic, visual effects and neighborhood character, water quality, and global warming (GHGs). Consistent with Section 15130(e), where significance of cumulative impacts was previously identified for the General Plan PEIR, and the proposed CPU is consistent, those impacts do not need to be analyzed further. The proposed CPU would add incremental effects to the issues identified above; however, the effects associated with the proposed CPU are also considered cumulatively significant. Based on the noted considerations, all of the issues areas identified as cumulatively significant in the General Plan PEIR are assessed below.

6.2 Cumulative Analysis Setting and Methodology

A broad examination of cumulative impacts involves considering the proposed CPU together with growth of the City and the region. Development pursuant to the General Plan would occur in accordance with the land use designations and development intensities identified in the Land Use and Community Planning Element of the City’s General Plan. The land uses and the associated potential development designated in the General Plan correlate to regional growth forecasts made by SANDAG. SANDAG forecasts anticipated growth for the 18 cities and the unincorporated areas within San Diego County for the purpose of allocating growth to specific areas based on adopted land use plans and identifying regional transportation infrastructure needed to support regional growth.

Section 5 of the PEIR for the City’s General Plan discusses the cumulative impacts that result from its implementation and is, therefore, incorporated by reference. The analysis in the General Plan PEIR relied on the regional growth forecasts provided by the SANDAG *2030 Regional Growth Forecast Update* (Regional Growth Forecast) estimates for employment, population, and housing for the period between 2004 and 2030. Cumulative impacts were analyzed in light of the significance thresholds presented in Sections 3.1 through 3.17 of the General Plan PEIR. The General Plan strategy anticipated the cumulative effects of growth and planned in a manner that would be balanced in its approach. The

focused growth strategy addresses future growth as a whole, and includes policies to avoid or reduce impacts on a cumulative basis.

Year 2035 is the relevant year for forecasted growth of the proposed CPU. Therefore, the cumulative analysis for the proposed CPU PEIR relies on the San Diego Region growth projections for 2035 provided in SANDAG's 2050 Regional Growth Forecast adopted in October 2013. The 2035 forecast for population, housing, and employment for the region are shown in Table 6-1.

Regional Growth Indicator	2035
Population	3,853,698
Housing Units	1,394,783
Jobs	1,769,938

Source: SANDAG 2013

6.2.1 Plans and Programs Evaluated for Cumulative Impacts

The City of San Diego General Plan, City of San Diego MSCP Subarea Plan, City of San Diego LDC, City of San Diego CAP, SDIA ALUCP, and SANDAG's RP2015 Regional Plan were used to evaluate cumulative impacts. These documents are on file at the City of San Diego Planning Department, 1010 Second Avenue, Suite 1200, East Tower, San Diego, California 92101 and available online. A summary of the status of these plans is included in Table 6-2.

Planning Documents	Location	Status
City of San Diego General Plan	City of San Diego	Final EIR certified and plan adopted in March 2008.
City of San Diego MSCP Subarea Plan	City of San Diego	Final EIR certified and plan adopted in March 1997.
City of San Diego LDC	City of San Diego	Final EIR certified and plan adopted in 1999.
City of San Diego CAP	City of San Diego	Approved on December 15, 2015.
San Diego International Airport ALUCP	San Diego International Airport	Final EIR certified and plan adopted by the San Diego County Regional Airport Authority Board of Directors in April 2014.
San Diego Forward: The Regional Plan (2015 Regional Plan)	San Diego Region	Final EIR adopted by the SANDAG Board of Directors on October 9, 2015.
San Diego Water Quality Improvement Plans	City of San Diego	Final MND adopted May 29, 2015

6.3 Assessment of Cumulative Impacts

The geographic scope for the analysis of cumulative impacts is dependent on the nature of the issue and the project and varies depending upon the environmental issue being analyzed. Often, cumulative impacts are not limited by jurisdictional boundaries. For example, the project's contribution to localized impacts, such as those associated with traffic or noise, would affect the local neighborhood and traffic study area. Other topic areas, such as biological resources, historical resources, or water quality, could extend to areas beyond the local vicinity to include geographic areas that share similar conditions and the potential for similar adverse effects to these resources. Further, the impacts associated with regional topics, such as air quality and GHG emissions, could extend throughout the entire air basin. Table 6-3 shows the cumulative impact analysis geographic scope and applicable plans for each issue area evaluated in the PEIR.

Issue Area	Geographic Scope	Applicable Plans
Land Use	Old Town community and adjacent community plan areas (Mission Valley, Uptown, Midway-Pacific Highway)	City of San Diego General Plan, City of San Diego MSCP Subarea Plan, City of San Diego Land Development Code, San Diego International Airport ALUCP, San Diego Forward: The Regional Plan (2015 Regional Plan)
Transportation and Circulation	Intersections, roadway segments, and freeway segments and ramps identified in the TIS prepared for the proposed CPU (see Section 2.1 of the TIS, Appendix B)	City of San Diego General Plan, City of San Diego Land Development Code, San Diego Forward: The Regional Plan (2015 Regional Plan)
Historical and Tribal Cultural Resources	Old Town community	City of San Diego General Plan, City of San Diego Land Development Code
Geologic Conditions	Old Town community and adjacent community plan areas (Mission Valley, Uptown, Midway-Pacific Highway)	City of San Diego General Plan, City of San Diego Land Development Code
Noise	Old Town community and adjacent community plan areas (Mission Valley, Uptown, Midway-Pacific Highway)	City of San Diego General Plan, City of San Diego Land Development Code, San Diego International Airport ALUCP
Health and Safety	Old Town community and adjacent community plan areas (Mission Valley, Uptown, Midway-Pacific Highway)	City of San Diego General Plan, City of San Diego Land Development Code
Hydrology/Water Quality	San Diego hydrologic unit and Pueblo San Diego hydrologic unit	City of San Diego General Plan, City of San Diego Land Development Code
Visual Effects and Neighborhood Character	Old Town community and adjacent community plan areas (Mission Valley, Uptown, Midway-Pacific Highway)	City of San Diego General Plan, City of San Diego Land Development Code
Air Quality and Odor	San Diego Air Basin	City of San Diego General Plan, City of San Diego Land Development Code, City of San Diego Climate Action Plan
GHG	Global and San Diego Region	City of San Diego General Plan, City of San Diego Land Development Code, City of San Diego Climate Action Plan
Public Services and Facilities	Old Town community and adjacent community plan areas (Mission Valley, Uptown, Midway-Pacific Highway)	City of San Diego General Plan, City of San Diego Land Development Code
Public Utilities	Old Town community and adjacent community plan areas (Mission Valley, Uptown, Midway-Pacific Highway)	City of San Diego General Plan, City of San Diego Land Development Code
Biological Resources	Old Town community and adjacent community plan areas (Mission Valley, Uptown, Midway-Pacific Highway)	City of San Diego General Plan, City of San Diego Land Development Code, City of San Diego MSCP Subarea Plan
Paleontological Resources	Southern California Region	City of San Diego General Plan, City of San Diego Land Development Code

6.3.1 Land Use

As discussed in this section, the proposed CPU contains nine elements providing community-specific goals and policies that implement the General Plan and provide community specific direction, design guidelines for public and private improvements and development, mobility recommendations, and programs in accordance with the goals of the City's General Plan and the implementing regulations of the City's LDC, including the Old Town San Diego PDO. Both the proposed CPU along with the adjacent community plan areas (Mission Valley, Midway-Pacific Highway, and Uptown) would accommodate existing development as well as encourage development consistent with community goals and character.

The proposed CPU combined with the adjacent community plan areas are consistent with and also implement the environmental goals or objectives of SANDAG's ~~RP-2015~~ Regional Plan. The proposed CPU and adjacent community plan areas are consistent with the City's MSCP and MHPA and Land Use Adjacency Guidelines. Development implemented in accordance with the proposed CPU and adjacent community plan areas would not result in conflicts with the City's ESL Regulations, which contains policies supporting the goals of these regulations. Any development within the proposed CPU area that would encroach into environmentally sensitive lands would be subject to review in accordance with the ESL Regulations (LDC, Section 143.0101 et seq.). Future development in accordance with the proposed CPU would also be required to comply with the City's HRR to protect designated and eligible historical resources in the proposed CPU area. Future development projects within the AIA would be submitted to the San Diego County Regional Airport Authority, acting as the ALUC, to ensure the consistency of future development with the ALUCP for SDIA, until the ALUC determines that the updated community plan and development regulations are consistent with the ALUCP or the City Council takes action to overrule the ALUC. Based on the compatibility of the proposed CPU with the General Plan policy framework and other applicable land use plans and regulations, cumulative land use compatibility and cumulative impacts associated with the proposed CPU would be less than significant.

6.3.2 Transportation and Circulation

Due to the nature of the project being an update to the adopted Community Plan with no specific development project being proposed at this time, the transportation and circulation analysis provided in Section 5.2 of this PEIR is cumulative in nature. Thus, impacts to roadway segments, intersections, freeway segments, and freeway ramp meters under the proposed CPU would result in a significant cumulative impact. Please refer to Section 5.2 for mitigation and significance conclusions.

6.3.3 Historical and Tribal Cultural Resources

As stated in Section 5.3, impacts to historical and tribal cultural resources would be considered significant with the implementation of the proposed CPU. While federal, state, and local regulations, as well as goals and policies developed by the City, would reduce impacts to historical and tribal cultural resources, the additional development in the proposed CPU area could still result in significant impacts to historical and tribal cultural resources. Each individual future project has the potential to contribute to incremental historical and tribal cultural resources impacts. This, in conjunction with impacts resulting from surrounding community plan updates, could contribute to a significant cumulative impact to historical and tribal cultural resources. Please refer to Section 5.3 for mitigation and significance conclusions.

6.3.4 Geologic Conditions

Cumulative impacts related to geologic hazards within the proposed CPU area and surrounding CPU areas such as Mission Valley, Uptown, and Midway-Pacific Highway would be less than significant with implementation of recommendations included in site-specific geotechnical investigations required under the SDMC and other standards, as discussed in the analysis. As discussed in Section 5.4 of this PEIR, geologic hazards occur from mapped faulting and site-specific soil or geologic conditions. Development of the proposed CPU in combination with surrounding communities would not compound or worsen potential geologic hazards. Geologic hazard conditions are site specific and do not compound or increase in combination with projected development elsewhere in the county. Thus, as each individual development would be required to comply with remedial measures identified in a site-specific geotechnical investigation, as required by the SDMC and other standards, cumulative impacts related to geologic hazards would be less than significant.

6.3.5 Noise

The analysis provided for noise is cumulative in nature because the analysis considers noise and vibration impacts associated with regional growth within and adjacent to the proposed CPU area, and the traffic assumptions used in the analysis includes cumulative traffic associated with growth in neighboring communities (Mission Valley, Uptown, and Midway-Pacific Highway areas). Noise impacts associated with growth in neighboring CPU areas would be localized in nature. For example, construction of restaurants or commercial uses in Midway-Pacific Highway or Uptown would not affect residences in Old Town with the exception of development that may occur at the boundary of the proposed CPU area. However, land uses within each CPU area would be subject to the same General Plan policies, noise ordinance requirements, and Title 24 standards discussed in this document that reduce noise impacts. Thus, cumulative noise impacts would be less than significant.

6.3.6 Health and Safety

As discussed in this PEIR, compliance with federal, state, regional, and local health and safety laws and regulations would address potential health and safety impacts. Potential health and safety impacts associated with wildfires, hazardous substances, emergency response and evacuation plans, and aircraft hazards would not combine to create cumulative impacts when viewed together with the potential growth that could occur within the proposed CPU and surrounding CPU areas (Mission Valley, Uptown, and Midway-Pacific Highway). Wildfire impacts in these communities are limited to the canyon areas, which are localized and would not be exacerbated by cumulative development in adjacent communities. Additionally, future projects implemented in accordance with the proposed CPU are required to follow the City's Brush Management Regulations and the City's Fire Code requirements. Similarly, potential hazards associated with hazardous material sites are site specific and would not combine with hazards in other community plan areas to create a cumulative impact. Therefore, implementation of the proposed CPU would not result in a cumulatively significant impact related to health and safety issues.

6.3.7 Hydrology/Water Quality

Future projects within the proposed CPU and surrounding areas, including projects within the San Diego and Pueblo San Diego hydrologic units, could have a cumulative impact on hydrology and water quality,

including downstream problems with flooding, sizing of drainage facilities, erosion, and sedimentation. However, all future development within the proposed CPU area and San Diego and Pueblo San Diego hydrologic units as a whole would be required to comply with all NPDES permit requirements, including the development of a SWPPP if the disturbed area covers one acre or more, or a Water Quality Control Plan if the disturbed area is less than one acre. Future projects would also be required to follow the City's Storm Water Standards Manual for drainage design and BMPs for treatment. Thus, cumulative impacts would be less than significant.

6.3.8 Visual Effects and Neighborhood Character

Future growth within the proposed CPU area and surrounding communities including Mission Valley, Uptown, and Midway-Pacific Highway have the potential to cumulatively impact the visual environment through the design and location of future buildings. Changes in visual character and quality resulting from individual development projects within the proposed CPU area and development within the Mission Valley, Uptown and Midway-Pacific Highway communities could contribute incrementally to cumulative impacts with regard to aesthetics. However, the cumulative visual impact would not result in a cumulatively significant impact since the adjacent CPU areas are already urbanized and include existing development of the type that would be further developed under the proposed CPU and the surrounding communities' land use plans.

Future development in accordance with the proposed CPU and surrounding communities is likely to take place on infill sites in previously developed locations. The proposed CPU and surrounding communities' land use plans (Mission Valley, Uptown, and Midway-Pacific Highway) contain policies to ensure that any new development is consistent with the existing character and protects public views. The proposed policies address consistency in setbacks, height and bulk, landscaping, design, historic character, and natural features such as hillsides. The proposed CPU and surrounding communities' land use plans contain policies to preserve, protect, and restore existing landforms. Compliance with the SDMC would ensure that cumulative light and glare impacts are avoided. Based on the existing urbanized character of the proposed CPU area and surrounding communities and implementation of existing regulations and policies in the proposed CPU and surrounding communities' land use plans, cumulative impacts would be less than significant.

6.3.9 Air Quality and Odor

For purposes of Issue 1 in Section 5.9, the cumulative study area would be considered the SDAB. Since the analysis provided under Issue 1 is a discussion of consistency with the air quality plan for the SDAB (i.e. the RAQS), the analysis provided a cumulative analysis by nature since it considers consistency of the project with a regional air quality plan that relies on the land use plans of jurisdictions within the basin. As discussed in Section 5.9, the net change in emissions from implementation of the project compared to the adopted Community Plan would generate air emissions that would not exceed the thresholds of significance. These thresholds are designed to identify those projects that would result in significant levels of air pollution and to assist the region in attaining the applicable NAAQS or CAAQS. Thus, the project would not result in an increase of emissions that would conflict with implementation of the air quality plan. Therefore, cumulative impacts related to conflicts with air quality plans would be less than significant.

As explained under Issue 2 in Section 5.9, the hypothetical intensive year of construction would not result in air emissions that would exceed the applicable thresholds. While unlikely to occur based on the fact that the proposed CPU area is largely built out and the proposed CPU is designed to guide development through 2035, future environmental review for these larger projects would allow for a site-specific analysis of construction level air quality emissions to ensure projects are appropriately phased and timed to avoid such cumulative construction emissions. Thus, the impact related to construction emissions would be less than significant. After construction, the net increase in emissions over the adopted Community Plan would not result in the generation of criteria air pollutant emissions that exceed the applicable threshold of significance. Since the RAQS are established for the SDAB which is the cumulative study area for air quality emissions, build-out of the land uses within the proposed CPU area would not have the potential to result in a significant cumulative impact. Therefore, cumulative operational emissions associated with build-out of the project would be less than significant.

The CO hot spot screening analysis did not identify any road segments in the proposed CPU area that would result in a CO hot spot. Since CO hot spots are a localized phenomenon, development within other community plans would not contribute to a cumulative CO hot spot impact. The San Diego APCD would require an emissions inventory and health risk assessment in accordance with AB 2588 prior to issuance of any permits to construct or operate a stationary emission source. These requirements would extend to land uses within the proposed CPU area in addition to land uses within the SDAB as a whole. Thus, existing regulations would ensure that cumulative impacts associated with stationary sources of toxic air emissions would be less than significant as build-out of the plan occurs.

Implementation of the proposed CPU would not result in a significant cumulative odor impact because the project would develop land uses that are not associated with generation of substantial odors. Thus, cumulative odor impacts would be less than significant.

6.3.10 Greenhouse Gas Emissions

Cumulatively, there exists a significant impact related to GHG emissions at the global level. However, as discussed under Issue 1, the project's contribution to the cumulative impact from GHG emissions would be less than cumulatively considerable because ~~the project would result in a decrease in GHG emissions when compared with land uses currently approved and~~ implementation of the proposed CPU would be consistent with the goals and strategy of the Climate Action Plan and City of Villages strategy. As discussed under Issue 2 in Section 5.10, City policies, plans, and codes will be evaluated as needed to ensure that CAP GHG emissions reduction targets are met. If implementation of the project cumulatively with other CPUs would be inconsistent with the CAP or other plans/policies for the reduction of GHGs, the City could amend land use plans to reflect more aggressive strategies for GHG reduction and to ensure consistency with the adopted CAP. Thus, the contribution of the project to the existing cumulative impact would be less than cumulatively considerable. Therefore, cumulative impacts related to GHGs would be less than significant.

6.3.11 Public Services and Facilities

Some of the City's existing built areas have existing infrastructure deficiencies and would require capacity improvements to serve additional population. Therefore, it is anticipated that new or improved public services and facilities infrastructure would be required to meet the needs of the City's future growth,

occurring through infill and redevelopment as well as remaining on vacant and developable lands. However, as discussed in this section, implementation of the project does not include construction of any specific public facilities or services. The proposed CPU includes policies that would support improvements to public facilities and includes a proposed IFS that would specify the DIF applicable to future development within the proposed CPU area.

Since no specific facilities are identified in the proposed CPU, the specific public facilities improvements that would be constructed in the cumulative area of Old Town, Midway-Pacific Highway, and adjacent community plan areas and the degree of future impacts and applicability, feasibility, and success of future mitigation measures are speculative at this program level of analysis. Thus, cumulative impacts related to public facilities would be less than significant at the program level.

6.3.12 Public Utilities

a. Water Supply

The WSA prepared for the project concluded that the project would be consistent with the water demand assumptions included in the regional water resource planning documents of the SDCWA and the MWD. Furthermore, current and future water supplies, as well as the actions necessary to develop these supplies, have been identified in the water resources planning documents of the PUD, the SDCWA, and MWD to serve the projected demands of the proposed CPU area, in addition to existing and planned future water demand of the City. Additionally, the proposed CPU contains policies intended to ensure that no excessive water use takes place, encourage water conservation and reclamation, and ensure the continued operability of existing infrastructure. Thus, cumulative impacts related to water supply would be less than significant.

b. Utilities

The specific utilities improvements that would be constructed in the cumulative area of Old Town and adjacent community plan areas and the degree of future impacts and applicability, feasibility, and success of future mitigation measures cannot be adequately known at this program level of analysis. Thus, cumulative impacts related to utilities would be less than significant at the program level.

c. Solid Waste and Recycling

The project combined with future development in surrounding communities would generate solid waste through demolition/construction and ongoing operations that would increase the amount of solid waste generated within the region. Future projects within the proposed Old Town CPU area and Citywide would be required to comply with City regulations regarding solid waste, including those intended to divert solid waste from the Miramar Landfill to preserve capacity. Compliance with the SDMC and consistency with the General Plan policies promoting waste diversion would serve to preserve solid waste capacity. Discretionary projects of 40,000 square feet or more generating more than 60 tons of waste would be required to develop and implement WMPs targeting 75 percent waste diversion. Therefore, cumulative solid waste impacts would be less than significant.

6.3.13 Biological Resources

Preservation of the proposed CPU region's biological resources has been addressed through the implementation of regional habitat conservation plans. Impacts to biological resources in the City of San Diego are managed through the adopted MSCP Subarea Plan, which is incorporated by reference in the General Plan.

Sensitive resources are located in MHPA or Open Space areas that are protected through respective designation and/or their location within MHPA areas in addition to protections provided by the City's ESL Regulations. These areas are outside the proposed CPU area. The proposed CPU and land use plans of surrounding communities incorporate policies related to the protection of biological resources focusing primarily on the land use plans' consistency with the ESL Regulations, the Biology Guidelines, and MSCP Subarea Plan Management Policies to protect the area's sensitive plants and animals.

Cumulative development that would occur within the proposed CPU area would result in less than significant cumulative impacts to biological resources due to the developed nature of this community combined with the existing regulatory framework that would ensure that impacts to sensitive biological resources are avoided and or mitigated. Although each individual future project may contribute to incremental biological resource impacts, compliance with proposed CPU policies, the MSCP Subarea Plan, ESL Regulations, and the Biology Guidelines would ensure that cumulative impacts from future development would be less than significant.

6.3.14 Paleontological Resources

Development allowed pursuant to the proposed CPU and development within surrounding communities could involve excavation of previously undeveloped areas, some of which may consist of unique paleontological resources with fossil-bearing potential. Potential cumulative impacts to paleontological resources were evaluated in the General Plan PEIR. The analysis concluded that there is potential for the cumulative loss of paleontological resources throughout the county, as the county continues to develop in response to projected population growth. Likewise, development of the proposed CPU area may result in the loss of unique paleontological resources or geologic formations with fossil-bearing potential. Certification of the General Plan PEIR included the adoption of mitigation measures that attempt to reduce significant project-level impacts from future development. However, there is only a mechanism to apply the mitigation framework to discretionary projects, not ministerial projects. Thus, within the proposed CPU area and surrounding communities, significant impacts to paleontological resources could occur associated with grading for ministerial projects. Similar to the General Plan PEIR, future ministerial projects within the proposed CPU area would result in significant cumulative impacts to paleontological resources (**Impact 5.14-2**).



Chapter 7.0

Other Mandatory Discussion Areas

CEQA Guidelines require that an EIR contain discussion of impacts associated with growth inducement, effects found not to be significant, significant unavoidable environmental impacts, and significant irreversible environmental changes. Each of these discussion areas is addressed in the sections below.

7.1 Growth Inducement

This PEIR must examine the potential growth-inducing impacts of the project. More specifically, CEQA Guidelines Section 15126.2(d) requires that an EIR:

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.

According to the City's Significance Determination Thresholds, growth inducement "is usually associated with those projects that foster economic or population growth, or the construction of additional housing, either directly or indirectly, which may result in the construction of major new infrastructure facilities. Also, a change in land use policy or projects that provide economic stimulus, such as industrial or commercial uses, may induce growth. Accelerated growth may further strain existing community facilities or encourage activities that could significantly affect the surrounding environment." In addition, the Thresholds state that "the analysis must avoid speculation and focus on probable growth patterns or projects."

The General Plan PEIR (2008a) notes that "population in San Diego will grow whether or not the Draft General Plan is adopted..." and although a number of the General Plan policies are in place to

“...encourage business, education, employment and workforce development...preserve and protect valuable employment land, especially prime industrial land, from conversion to other uses...and facilitate expansion and new growth of high quality employment opportunities in the City.” The General Plan incorporates the previously adopted City of Villages strategy, which notes that a “village” is a place where residential, commercial, employment, and civic uses are present and integrated, and are characterized by compact mixed-use areas, that are pedestrian-friendly and linked to the regional transit system (City of San Diego 2008b). Based on Government Code Section 65300, the General Plan serves as a comprehensive, long-term plan for physical development of the City and, by definition, is intended to manage and address future growth in the City. Implementation of the City of Villages strategy relies on the future designation and development of village sites through comprehensive community plan updates.

The project serves as a comprehensive long-term plan for the physical development of the proposed CPU area, and is intended to manage and address future growth of the community through 2035. There is a current estimate of 830 residents in the proposed CPU area. Under the adopted Community Plan, the City estimates that the forecasted population would be 985 in year 2035; under the proposed CPU, by the year 2035, this population is projected to be 1,280 residents. While the population projections of the Old Town community would be more than projected with the adopted Community Plan, the proposed CPU serves as a comprehensive long-term plan for the physical development of the proposed CPU area, and is intended to manage and address future growth through to development of the community.

The proposed CPU incorporates the General Plan City of Villages Strategy by creating individual sub-districts with distinct characteristics throughout the proposed CPU area. Specific policies and guidelines for each sub-district are laid out in Section 3 of the proposed CPU. The sub-districts include the following: Presidio Sub-District, Historic Core Sub-District, Core Sub-District, Hortensia Sub-District, Heritage Sub-District, Taylor Sub-District, Residential Sub-District, and Hillside Sub-District. The community and neighborhood village concept draws upon the character and strength of the proposed CPU area setting, commercial center in the Core Sub-District, transit center, employment centers in the Hortensia and Taylor Sub-Districts, and parks and institutions in the Historic Core, Heritage, and Presidio sub-districts. The sub-districts are planned to be pedestrian neighborhoods with enhanced connectivity that reflect the types of public spaces, structures, public art, connections, and land uses. The proposed CPU policy directs housing growth to areas suitable for mixed-use and residential development near the Old Town Transit Center.

The proposed CPU is intended to provide guidance on growth and infill development consistent with the architectural styles that existing prior to 1872 in Old Town San Diego. Through the placement of higher-density residential development in areas near the Old Town Transit Center, the proposed CPU would reinforce a mixed-use urban environment that supports transit and pedestrian activity. The proposed CPU would designate land uses to accommodate growth, although additional housing units would not be built without demand. The proposed CPU includes an IFS that would allow improvements in infrastructure capacity and public services to coincide with future development. Other potential environmental impacts associated with population growth in the proposed CPU area (e.g., transportation/traffic, air quality, noise, GHG emissions) are addressed in the relevant sections of this PEIR.

As stated above, the population in the proposed CPU area will grow whether or not the proposed CPU is adopted. The proposed CPU promotes infill residential, commercial, and office development within walking distance to transit services and encourages the use of local and state programs to incentivize

business retention and expansion. Additional policies are intended to facilitate economic well-being of locally owned and operated businesses and create ample job opportunities for residents in the proposed CPU area. These policies serve to facilitate expansion and growth of employment opportunities for small business and visitor related businesses. Therefore, the proposed CPU would provide comprehensive planning for the management of population growth, and necessary economic expansion to support development efforts, and allow an appropriate balance of managed population, housing, and economic growth to accommodate community development while maintaining related community and environmental standards.

7.2 Effects Found Not To Be Significant

CEQA Guidelines Section 15128 requires that an EIR contain a brief statement disclosing the reasons why various possible significant effects of a project were found not to be significant and therefore would not be discussed in detail in the EIR. The impacts associated with the following environmental issue areas were found to not be significant as a result of the project: agricultural resources, mineral resources, population and housing, and energy.

7.2.1 Agricultural Resources

7.2.1.1 Farmland Mapping and Monitoring Program

Based on the farmland maps prepared by the California Department of Conservation ([CDC] 2016)), the proposed CPU area is not identified as containing Prime Farmland, Unique Farmland, or Farmland of Statewide Importance. Therefore, there would be no impact to Prime Farmland, Unique Farmland, or Farmland of Statewide Importance.

7.2.1.2 Agricultural Zoning/Williamson Act

The proposed CPU area is not zoned for agriculture and there are no lands under a Williamson Act contract (CDC 2016). Therefore, no impact is identified for this issue area.

7.2.1.3 Forest, Timberland, Timberland Production Zone

The proposed CPU area is located within an urbanized area. There are no existing forestlands, timberlands, or timberland for Timberland Production Zone within the proposed CPU area or in the immediate vicinity that would conflict with existing zoning or the proposed rezoning (USDA 2017). Therefore, no impact is identified for this issue area.

7.2.1.4 Loss of Forest Land

The proposed CPU area is located within an urbanized area. There are no existing forestlands within the proposed CPU area or in the immediate vicinity (USDA 2017). The implementation of the project would not result in the loss of forestland or conversion of forestland to non-forest use. Therefore, no impact is identified for this issue area.

7.2.1.5 Natural Conversion of Farmland or Forest

The proposed CPU area is located within an urbanized area; there are no existing forestland uses on-site or in the immediate vicinity (USDA 2017). The implementation of the project would not involve any other changes that could result in conversion of farmland to non-agricultural use (i.e., increase in population) or conversion of forestland to non-forest use. Therefore, no impact is identified for this issue area.

7.2.2 Mineral Resources

According to the CDC, Division of Mines and Geology, the area of the proposed CPU is designated as within the following Mineral Resource Zone (MRZ) boundaries on the Mineral Land Classifications Map of Western San Diego County (CDC 1996):

- MRZ-1:** Areas where adequate geologic information indicates that no significant mineral deposits are present, or where it is judged that little likelihood exists for their presence.
- MRZ-3:** Areas containing mineral deposits the significance of which cannot be evaluated from available data.

According to the CDC, Division of Mines and Geology Open File Report 96-04, areas mapped as Mineral Resource Zone 1, 2, 3, and 4 (MRZ-1 through MRZ-4) have been mapped for the City of San Diego. MRZ-1 areas are locations in San Diego County that have been identified as having no significant mineral deposits. Areas mapped in MRZ-2 are considered to have extractable aggregate deposits. Areas mapped in MRZ-3 contain mineral deposits that may qualify as mineral resources. MRZ-4 areas are those where geologic information does not rule out the presence or absence of mineral resources. Based on a review of referenced data, the proposed Old Town CPU area is in an urban area where the potential for loss of mineral deposits due to further development is considered low (CDC 2016).

In addition, the proposed CPU area is located entirely within a developed urban area and does not require the acquisition of additional land. There are no identified mineral resources that would be affected or “lost” as a result of the implementation of the project. Thus, the project would not result in a loss of availability of a locally important mineral resource recovery site delineated on any local or general plan. Therefore, no impact to mineral resources would occur.

7.2.3 Population and Housing

While population projections for the proposed Old Town CPU area indicate that population will increase over time, the population growth would not induce substantial population growth. The proposed CPU would serve as a comprehensive, long-term plan for the physical development of the proposed Old Town CPU area and is intended to manage and address future growth in it. The project would not displace people or existing housing, as the project would designate planned land uses and zoning that would accommodate future development within the proposed CPU area. Therefore, no impact to population and housing would occur.

7.2.4 Energy

Section 15126.4 (a)(1) of the CEQA Guidelines states that an EIR shall describe feasible measures, which could minimize significant adverse impacts, including, where relevant, the inefficient and unnecessary consumption of energy. CEQA Guidelines, Appendix F, Energy Conservation, provides guidance for EIRs regarding potential energy impacts of proposed projects, with particular emphasis on avoiding or reducing the inefficient, wasteful, and unnecessary consumption of energy. The California Natural Resources Agency (Resources Agency) amended Appendix F to make it clear that an energy analysis is mandatory. However, the Resources Agency also clarified that the energy analysis is limited to effects that are applicable to the project (Resources Agency 2009). Furthermore, Appendix F is not described as a threshold for determining the significance of impacts. Appendix F merely seeks inclusion of information in the EIR to the extent relative and applicable to the project.

Because the proposed action is the adoption of a proposed community plan update and associated discretionary regulatory actions, and does not specifically address any particular development project(s), impacts to energy resources are addressed generally, based on projected future development of the project. Implementation of the project has the potential to result in impacts to energy supply due to development that is anticipated to occur in response to projected population growth. Depending on the types of future uses, impacts would need to be addressed in detail at the time specific projects are proposed. At a minimum, future projects implemented in accordance with the proposed CPU project would be required to meet the mandatory energy standards of the current California energy code (Title 24 Building Energy Standards of the California Public Resources Code).

Energy resources would be consumed during construction of future development. Energy also would be consumed to provide operational lighting, heating, cooling, and transportation for future development.

7.2.4.1 Construction-Related Energy Consumption

Grading and construction activities consume energy through the operation of heavy off-road equipment, trucks, and worker traffic. At the program level, it is too speculative to quantify total construction-related energy consumption of future development, either in total or by fuel type. The majority of energy to be used in conjunction with construction activities would be supplied by SDG&E in addition to other oil and petroleum resources.

Solid waste disposal also consumes energy through the operation of heavy off-road equipment, trucks, and traffic. In compliance with the City's Significance Determination Thresholds for solid waste, future discretionary projects of 40,000 square feet or more exceeding 60 tons of solid waste would be required to develop WMPs and comply with the AB 341 target of at least 75 percent waste reduction, including construction waste. Even though exact details of the projects implemented in accordance with the proposed CPU project are not known at this time, there are no conditions in the proposed CPU area that would require non-standard equipment or construction practices that would increase fuel-energy consumption above typical rates. Therefore, development pursuant to the project would not result in the use of excessive amounts of fuel or other forms of energy during the construction of future projects.

7.2.4.2 Long-Term Operation-Related Energy Consumption

Long-term operational energy use associated with the project includes fuel consumption of vehicles, electricity and natural gas consumption by residents and commercial operations, and energy consumption related to obtaining water. However, the use of these resources would still be used daily as essential energy sources and utilities regardless of implementation of the project. As such, although long-term operational energy use would result from future development, such changes would not be considered significant in comparison to the energy use of other communities in the region. The project would not result in any unusual characteristics that would result in excessive long-term operational building energy demand.

At a minimum, development under the project would be required to meet the mandatory energy standards of the current California Energy Code (Title 24 Building Energy Standards of the California Public Resources Code). Some efficiencies associated with the Energy Standards under Title 24 include the building HVAC mechanical system, water heating system, and lighting system. Additionally, rebate and incentive programs that promote the installation and use of energy-efficient plug-in appliances and lighting would be available, but not covered under Title 24. Development would be subject to policies within the proposed CPU's Urban Design and Conservation elements, which contain a number of sustainable development policies that focus on designing new development to have a climate, energy-efficient, and environmentally oriented site design.

Policies in the proposed CPU would further address energy consumption. Specifically, proposed Conservation Element and Urban Design Element policies would reduce local dependence on automobile transportation, support incorporation of sustainable building and development practices, adhere to standardized measures outlined in the City's CAP, and reduce waste.

Although these policies would decrease the overall per capita energy use in the proposed CPU area, they would not ensure that energy supplies would be available when needed. Future projects would be subject to review for measures that would further reduce energy consumption in conformance to existing regulations. Furthermore, the City's CAP, adopted by City Council in December 2015, includes 2020 and 2035 targets that are on the trajectory for meeting the 2050 GHG reduction goals established by Executive Order S-3-05. Future projects would be reviewed for consistency with the CAP and applicable implementation measures.

Future operational energy use related to roadways would consist of the transportation fuels consumed to transport area residents, workers, and visitors. Total daily vehicle trips for the proposed CPU's buildout are estimated to be 58,802, as detailed in the Mobility Report prepared for the project (Chen Ryan Associates 2017). The proposed CPU Mobility Element also contains policies that would reduce vehicle miles travelled and associated fuel consumption. These include policies to improve the pedestrian environment and neighborhood walkability, improve bicycle infrastructure and facilities, maintain and enhance the transit-rider experience at the Old Town Transit Center, and parking management and supply strategies to help reduce the number of vehicles searching for parking within the Core Sub-District.

In conclusion, development under the project would result in increased energy use, in the form of new buildings and transportation. Residential and nonresidential developments use electricity, natural gas, and petroleum products for power, lighting, and heating, and vehicles use both oil and gas. Use of these

types of energy for new development would result in the overall increased use of nonrenewable energy resources. This represents an irreversible environmental change.

As described in this PEIR, the proposed CPU contains policies aimed at improving energy efficiency, reducing water use, and minimizing impacts to natural resources, which serve to reduce irreversible consumption of building materials, water, and energy use.

7.3 Unavoidable Significant Environmental Impacts

In accordance with CEQA Guidelines Section 15126.2(b), any significant unavoidable impacts of a project, including those impacts that can be mitigated, but not reduced to below a level of significance despite the applicant's willingness to implement all feasible mitigation measures, must be identified in the PEIR. For the project, impacts related to transportation and circulation (cumulative impacts to roadway segments, intersections, freeway segments, and freeway ramps), noise (construction-related noise and vibration and vehicle noise impacts), historical resources (historical and tribal cultural and archaeological resources), and paleontological resources (future ministerial development) would remain significant and unavoidable (refer to the Environmental Analysis section of this PEIR, Sections 5.1 through 5.14, for further detail). All other significant impacts identified in Chapter 5.0 of this PEIR can be reduced to below a level of significance with implementation of the mitigation framework identified, as well as through compliance with adopted General Plan and proposed CPU policies.

7.4 Significant Irreversible Environmental Changes

Section 15126.2(c) of the CEQA Guidelines requires an evaluation of significant irreversible environmental changes that would occur should the project be implemented. Irreversible changes typically fall into one of three categories:

- Primary impacts such as the use of nonrenewable resources (i.e., biological habitat, agricultural land, mineral deposits, water bodies, energy resources and cultural resources);
- Primary and secondary impacts such as highway improvements which provide access to previously inaccessible areas; and
- Environmental accidents potentially associated with future development under the project.

Section 15126.2(c) of the CEQA Guidelines states that irretrievable commitments of resources should be evaluated to ensure that current consumption of such resources is justified.

Implementation of the project would not result in significant irreversible impacts to agricultural land, biological habitat, mineral deposits, or water bodies. Although sensitive biological resources are identified within the canyons and MHPA in the proposed CPU area (see Section 2.3.13 of this PEIR), direct and indirect impacts can be offset through strict compliance with proposed CPU policies and regulatory compliance (MSCP and ESL Regulations of the LDC). Similarly, future development pursuant to the project could impact important historical and tribal cultural resources given the presence of known and potential historical, tribal cultural, or archaeological resources within the Old Town community. Potential impacts to historical, tribal cultural, or archaeological resources can be mitigated through strict adherence to proposed CPU policies, regulatory compliance (LDC Historical Resource Regulations), and

implementation of the mitigation framework further detailed in Section 5.3 of this PEIR. Impacts to historical, tribal cultural, and archaeological resources would, however, remain significant and unavoidable. As evaluated in Section 7.2, Effects Not Found to be Significant, of this PEIR, implementation of the project would not result in significant irreversible impacts to agricultural and forestry or mineral resources. Finally, no water bodies are present within the proposed CPU area, and no downstream receiving waters would be impacted by the proposed CPU.

The Old Town community is an urban community and is accessible via regional transportation facilities (e.g., I-5, and I-8,) local streets, and the Old Town Transit Center. No new freeways or roadways are proposed that would provide access to currently inaccessible areas. Therefore, implementation of the project would not result in a significant irreversible commitment with regard to unplanned land use.

Construction of development implemented in accordance with the project would require the irreversible consumption of natural resources and energy. Natural resource consumption would include lumber and other forest products, sand and gravel, asphalt, steel, copper, other metals, and water. Building materials, while perhaps recyclable in part at some long-term future date, would for practical purposes be considered permanently consumed. Energy derived from nonrenewable sources, such as fossil fuels, would be consumed during construction and as a result of operational lighting, heating, cooling, and transportation uses. The proposed CPU includes sustainable building design policies aimed at improving energy efficiency, reducing water use, and minimizing impacts on other natural resources. Modern sustainable building features can include alternative building materials, energy and water conservation systems, and alternative sources of energy, such as permeable paving surfaces, photovoltaic panels, and rainwater and greywater collection systems. These policies would serve to reduce irreversible water, energy, and building materials consumption associated with construction, occupation, and operation. Energy consumption was discussed in greater detail in Section 7.2.4 above.

With respect to environmental accidents potentially associated with development of the project, and as further discussed in Section 5.6 of this PEIR, potential impacts related to hazardous materials and associated health hazards from implementation of the project would be avoided or reduced to below a level of significance through mandatory conformance with applicable regulatory/industry standards and codes. The proposed CPU area contains undeveloped land in the form of canyons and parks that is occupied by a variety of native/naturalized vegetation and nonnative plant communities. Due to the amount of natural, unmaintained open space in the proposed CPU area, there is a very high risk for wildfires. Development pursuant to the project, however, would be subject to applicable state and City regulatory requirements related to fire hazards and prevention. Accidents related to flood hazards would not be significant because all development would be subject to drainage and floodplain regulations in the SDMC, and would be required to adhere to the City's Drainage Design Manual and Storm Water Standards Manual.



Chapter 8.0 Alternatives

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 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 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.

As discussed in Sections 5.1 through 5.14 and Chapter 6.0, the project would result in less than significant impacts related to land use, transportation and circulation (alternative transportation), geologic conditions, health and safety, hydrology/water quality, visual effects/neighborhood character, air quality, GHG emissions, public services and facilities, public utilities, and biological resources. Also, as discussed in Sections 5.1 through 5.14 and Chapter 6.0, the project would result in significant and/or cumulative environmental impacts related to transportation and circulation; historical and tribal cultural resources; noise; and paleontological resources. In developing the alternatives to be addressed in this chapter, consideration was given regarding their ability to meet the basic objectives of the project and the potential to eliminate or substantially reduce significant environmental impacts (as identified in Sections 5.1 through 5.14 and Chapter 6.0 of this PEIR).

The following specific objectives for the proposed CPU support the underlying purpose of the project, assisted the City as lead agency in developing a reasonable range of alternatives to evaluate in this PEIR, and will ultimately aid the lead agency in preparing findings and overriding considerations, if necessary. The following primary goals, recommendations, and objectives of the proposed CPU are to:

- Maintain and enhance the pre-1872 community character of Old Town through land use and urban design policies and development regulations.
- Enhance the Core Sub-District as the pedestrian-oriented commercial center of the community.

- Improve the integration between the Core Sub-District and Old Town San Diego State Historic Park.
- Maintain a balance between visitor-serving uses and residential uses.
- Increase the availability of housing in proximity to transit.
- Enhance facilities and amenities within parks and recreation sites in the community.
- Improve pedestrian and bicycle linkages to adjacent communities and amenities including the San Diego River and Old Town Transit Center.
- Preserve the community's historical, archaeological and tribal cultural resources.
- Identify future alternative uses for the Fremont School/Ballard Parent Center site.

The alternatives addressed in this PEIR were selected in consideration of one or more of the following factors:

- The extent to which the alternative would feasibly accomplish most or all of the basic objectives of the proposed CPU;
- The extent to which the alternative would avoid or substantially lessen any of the identified significant environmental effects of the project.
- The feasibility of the alternative, taking into account site suitability, economic viability, availability of infrastructure, general plan consistency, and consistency with other applicable plans and regulatory limitations;
- The appropriateness of the alternative in contributing to a “reasonable range” of alternatives necessary to permit a reasoned choice; and
- The requirement of the CEQA Guidelines to consider a “no project” alternative; and to identify an “environmentally superior” alternative in addition to the no project alternative (Section 15126.6[e]).

Based on the criteria described above, this PEIR considers the following project alternatives to the proposed CPU:

- No Project Alternative (adopted Community Plan)
- Alternative 1
- Alternative 2

General descriptions of the characteristics of each of these alternatives, along with a discussion of their ability to reduce significant environmental impacts associated with the project are provided in the following subsections. Table 8-1, Comparison of Future Land Uses, provides a comparison of the future land uses under the No Project Alternative, Alternative 1, Alternative 2, and the project, and Table 8-2, Matrix Comparison of Project Alternatives and proposed CPU, provides a side-by-side comparison of the potential impacts of the alternatives to the impacts of the project.

**Table 8-1
Comparison of Future Land Uses**

Land Use	No Project Alternative			Alternative 1			Alternative 2			Project		
	Acres	Dwelling Units	Floor Area	Acres	Dwelling Units	Floor Area	Acres	Dwelling Units	Floor Area	Acres	Dwelling Units	Floor Area
Retail Commercial	16.2	35	360,400	25.5	349	417,870	20.5	162	388,700	25.8	758	399,400
Communications and Utilities	0.9	0	0	0.9	0	0	0.9	0	0	0.9	0	0
Hotel	12.2	0	426,152	10.4	0	394,575	12.2	0	426,152	10.4	0	394,575
Institutional	6.9	0	88,373	2.4	0	45,620	2.4	0	45,620	2.4	0	45,620
Military	2.9	0	56,359	0	0	0	2.9	0	56,359	0	0	0
Office	24.1	0	581,524	24.0	0	578,260	24.2	0	583,544	23.9	48	565,730
Parking Lot	2.7	0	0	2.7	0	0	2.7	0	0	2.7	0	0
Parks and Open Space	65.7	0	7,114	65.7	0	7,114	65.7	0	7,114	65.7	0	7,114
Residential - Multi Family	14.3	413	0	14.5	458	0	14.5	445	0	15.8	520	0
Residential - Single Family	6.7	122	0	6.5	118	0	6.5	118	0	5.0	79	0
Self-Storage	0.4	0	20,000	0.4	0	20,000	0.4	0	20,000	0.4	0	20,000
Tourist Attraction	22.7	0	15,029	22.7	0	15,029	22.7	0	15,029	22.7	0	15,029
Transit Center	4.9	0	3,882	4.9	0	3,882	4.9	0	3,882	4.9	0	3,882
Transportation	93.7	0	0	93.7	0	0	93.7	0	0	93.7	0	0
Undevelopable Natural Area	0.4	0	0	0.4	0	0	0.4	0	0	0.4	0	0
Grand Totals	274.67	570	1,558,833	274.67	925	1,482,350	274.6	725	1,546,400	274.67	1,405	1,451,350
Estimated Future Population	985			1,600			1,280			2,430		

**Table 8-2
Matrix Comparison of Project Alternatives and Proposed CPU**

Environmental Issue Area	Project	No Project Alternative (Adopted Community Plan)	Alternative 1	Alternative 2
Land Use	LS	LS (>)	LS (>)	LS (>)
Transportation and Circulation	SU Traffic Circulation LS Alternative Transportation	SU (<) Traffic Circulation LS (>) Alternative Transportation	SU (<) Traffic Circulation LS (=) Alternative Transportation	SU (<) Traffic Circulation LS (=) Alternative Transportation
Historical and Tribal Cultural Resources	SU	SU (=)	SU (=)	SU (=)
Geologic Conditions	LS	LS (=)	LS (=)	LS (=)
Noise	SU	SU (=)	SU (=)	SU (=)
Health and Safety	LS	LS (=)	LS (=)	LS (=)
Hydrology/Water Quality	LS	LS (=)	LS (=)	LS (=)
Visual Effects/ Neighborhood Character	LS	LS (=)	LS (=)	LS (=)
Air Quality	LS	LS (=)	LS (<)	LS (<)
Greenhouse Gas Emissions	LS	LS (>)	LS (>)	LS (>)
Public Services and Facilities	LS	LS (<)	LS (<)	LS (<)
Public Utilities	LS	LS (<)	LS (<)	LS (<)
Biological Resources	LS	LS (=)	LS (=)	LS (=)
Paleontological Resources	SU	SU (=)	SU (=)	SU (=)

Notes: SU = Significant and Unavoidable (for the issue that results in the impact); LS = Less than Significant = Impacts the same/similar to the project; < Impact less than the project; > Impacts greater than the project.

8.1 No Project Alternative (Adopted Community Plan)

8.1.1 Description

Under the No Project Alternative, the adopted Community Plan would continue to guide development. Last updated in 1987, the current Community Plan identifies issues that are the most important to be addressed in the community plan through land use designations, policies, and regulations. Issues identified in the adopted Community Plan are listed in Table 8-3.

Historical Context	Development in the community lacks the appropriate historical appearance and development context.
	Presidio Park's historical importance has not been given the proper role within the community.
	There are still many remaining issues that are incompatible with the historical and commercial/residential character of the community.
Land Use	Regional and community-based land use needs have to be addressed and carefully balanced.
	Business activities need to be coordinated and upgraded by promoting an upscale image, to provide better services to the visitor as well as the residential community.
	Recent development activity has resulted in too dense and out of scale development inconsistent with the community's historical development.
	The Planned District Ordinance has not been implemented consistently and its development guidelines are too flexible and subject to varied interpretations. As a result, the ordinance has not had the unifying effect that was originally intended.
Circulation	The community is subject to traffic congestion and inadequate parking facilities.
	There is an opportunity to plan new development to take advantage of proposed transit lines. San Diego Trolley extensions are proposed from downtown San Diego to the North City and East County areas. Both lines are planned to come through the western boundary of the Old Town San Diego plan area. Station locations and related land use and circulation patterns for supportive activities have to be analyzed and planned in order to take full advantage of the transit improvement.
	The existing street and town development pattern and the community's historic townscape are being threatened by street vacations, closures, and parcel consolidation.
Government Agencies and Public	Several different government agencies have land and businesses in the Old Town San Diego community. Their activities, however, have been uncoordinated.
	Opportunities exist for the reuse of government-owned lands in these areas where present uses are inconsistent with the community's development. The present outdoor storage and other related uses on these sites will undoubtedly be moved to other more appropriate and functional locations at a later date.
	Public improvements, particularly streets, need enhancement in order to provide a better pedestrian scale and environment. Entrances into the community also need to be designed and enhanced.

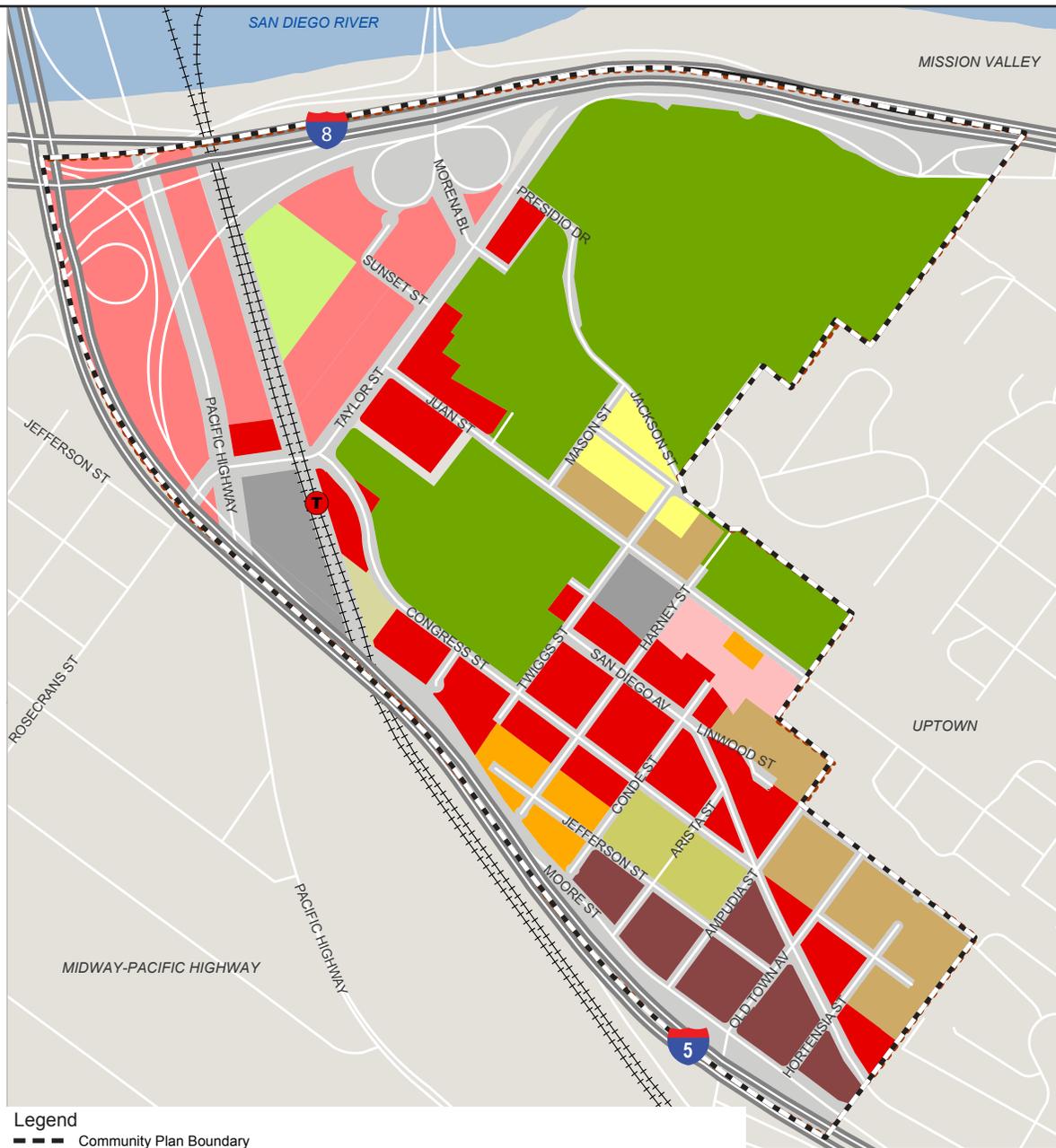
The No Project Alternative would consist of the adopted Community Plan land use designations as they apply today (see Figure 8-1), including all amendments to the Community Plan from its original adoption in 1987 to the most recent amendment in 2001. Table 8-4 describes the history of amendments to the Old Town Community Plan that are considered part of the No Project Alternative.

Amendment	Date Adopted by City Council	Resolution Number
North Bay Revitalization Program	May 4, 1998	R-290045
Hacienda Hotel	November 27, 2001	R-295789

The adopted Community Plan land use designations seek to focus on the combination of tourist and residential development while establishing density standards that are consistent with the community's historical precedent. This balance of density within the community may result in lower density than what was currently present before the adoption of the 1987 Community Plan. There is a focus on design guidelines and public improvements to enhance the area's historical context and maintain the balance between the regional visitor-oriented facilities and the community resident-oriented needs. As such, the adopted Community Plan seeks to increase the possibility of residential construction by extending the residential land use zone and eliminating certain permitted uses within residential areas, such as churches, boarding and lodging, and group dwellings. The adopted Community Plan also aims to increase the size of the historical core area and provide for additional retail in that area.

Figure 8-1 shows the No Project Alternative (adopted Community Plan) land use map. The No Project Alternative is generally very similar to the proposed CPU in that it shares similar goals related to retaining and enhancing the community's distinctive historical character, as well as recognizing the importance of the adopted Community Plan area as both a visitor destination and an established residential community.

The proposed CPU would result in less Commercial - Retail floor area than the No Project Alternative. The assumed development under the proposed CPU would decrease the amount of Commercial - Retail floor area, which in turn would allow additional dwelling units to be developed in the form of mixed-use development. Otherwise, the land uses under the No Project Alternative are generally similar to the proposed CPU land uses. Table 8-5 presents a comparison of the No Project Alternative (adopted Community Plan) and the proposed CPU future land uses in 2035, including acreage by generalized land use, dwelling units, floor area, and projected household population.

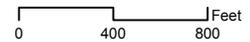


Legend

--- Community Plan Boundary

No Project (Adopted Community Plan) Land Use Designations

- | | |
|---|---------------------------|
| Single Family Residential (up to 9 du/ac) | Hotel/Office (0-25 du/ac) |
| Multifamily Residential (up to 25 du/ac) | Historic Parks |
| Core/Commercial Residential (0-25 du/ac) | Parking/Parks |
| Residential/Commercial (0-25 du/ac) | Parking/School |
| Residential/Hotel (0-25 du/ac) | Surface Parking |
| Hotel/Office/Retail (0-25 du/ac) | Transit Center |



Copyright 2012 SanGIS - All Rights Reserved.
Full text of this legal notice can be found at:
http://www.sangis.org/Legal_Notice.htm



Figure 8-1
No Project Alternative:
Adopted Community Plan Land Use

Old Town Community Plan Update PEIR

No Project Alternative				Project			
Generalized Land Use	Acres	Dwelling Units	Floor Area	Generalized Land Use	Acres	Dwelling Units	Floor Area
Retail Commercial	16.2	35	360,400	Retail Commercial	25.8	758	399,400
Communications and Utilities	0.9	0	0	Communications and Utilities	0.9	0	0
Hotel	12.2	0	426,152	Hotel	10.4	0	394,575
Institutional	6.9	0	88,373	Institutional	2.4	0	45,620
Military	2.9	0	56,359	Military	0	0	0
Office	24.1	0	581,524	Office	23.9	48	565,730
Parking Lot	2.7	0	0	Parking Lot	2.7	0	0
Parks and Open Space	65.7	0	7,114	Parks and Open Space	65.7	0	7,114
Residential - Multi Family	14.3	413	0	Residential - Multi Family	15.8	520	0
Residential - Single Family	6.7	122	0	Residential - Single Family	5.0	79	0
Self-Storage	0.4	0	20,000	Self-Storage	0.4	0	20,000
Tourist Attraction	22.7	0	15,029	Tourist Attraction	22.7	0	15,029
Transit Center	4.9	0	3,882	Transit Center	4.9	0	3,882
Transportation	93.7	0	0	Transportation	93.7	0	0
Undevelopable Natural Area	0.4	0	0	Undevelopable Natural Area	0.4	0	0
Totals	274.67	570	1,558,833	Totals	274.67	1,405	1,451,350
Estimated Future Population = 985				Estimated Future Population = 2,430			

8.1.2 Analysis of No Project Alternative (Adopted Community Plan)

a. Land Use

The No Project Alternative (Adopted Community Plan) would retain the adopted Community Plan land use map and the existing PDO. Land use impacts under the No Project Alternative would be slightly greater than the anticipated impacts of the project, but would not contain the proposed CPU policies and land use changes intended to improve compatibility with and implement the San Diego General Plan. The adopted Community Plan intends to recover and further enhance the area's historical context through design guidelines in the Old Town San Diego Architectural and Site Design Standards and Criteria document and public improvements, as well as maintain the balance between the area's regional visitor-oriented facilities and the community's resident-oriented needs, similar to the proposed CPU. The No Project Alternative also intends to establish the area identified as the "core" to become the central commercial/retail area of the community, which is similar to the project that intends to enhance the Core Sub-District as the pedestrian-oriented commercial center of the community. The No Project Alternative also proposes to increase the size of the historical core area and provide a logical transition into the "core area," which is also similar to the project that proposed to improve the integration between the Core Sub-District and the Old Town San Diego State Historic Park.

Regarding parks, the No Project Alternative includes recommendations to retain and enhance park space with the community. The recommendations include working with the San Diego Historical Society to implement programs and long-range plans for the City-owned historic sites in the community and providing pedestrian access between Presidio Park, under I-5, to connect to the Midway-Pacific Highway community. The adopted Community Plan also proposes community focal points, retention of natural open space/hills, and freeway buffers.

The No Project Alternative would not increase residential development in the community in proximity to transit services to meet the needs of a growing population to the same degree as the proposed CPU, as shown in Table 8-5. With regard to the Fremont School/Ballard Parent Center site, this alternative would maintain the land use designation of school/parking with a recommendation to reuse the site as a parking reservoir area with some institutionally- and residentially-oriented mixed use. The No Project Alternative would not facilitate the mixed use re-use of the Ballard Parent Center site to the same degree as the proposed CPU, which has designated the site for Mixed Commercial Residential use with a residential density up to 54 du/ac. The No Project Alternative would also not contain the urban design guidelines as proposed by the proposed CPU, which are an update to the guidelines contained in the current Architectural and Site Design Standards and Criteria document.

With the No Project Alternative, the current PDO would continue to be in effect in the proposed CPU area. With the project, the current PDO would be revised to implement the proposed CPU. Proposed revisions to the PDO are included in Section 3.4.2. The proposed revisions are generally administrative related in that they proposed changes to development permit types and implementing a new zone naming convention that more closely mirrors the Citywide zones. Permitted uses would also be translated from PDO categories into Citywide categories. The revised PDO proposes to regulate building color and proposes new signage regulations to be more historically accurate and clearer. Revisions to the PDO would support the project objective to maintain and enhance the pre-1872 community character through land use and urban design policies and development regulations.

The No Project Alternative would not include the proposed CPU policies that support increasing residential and mixed-use opportunities near the Old Town Transit Center consistent with the General Plan City of Villages or the City's CAP, as all have been created or updated since the adopted Community Plan. Although the adopted Community Plan would not conflict with adopted land use plans, policies, or ordinances, and would result in a less than significant land use impact overall, the No Project Alternative would be less compatible with the project objectives than the proposed CPU when viewed in relation to applicable land use plans and policies. Thus, the land use impacts of the No Project Alternative would be less than significant and slightly greater than the project.

In summary, the No Project Alternative would meet the following project objectives to a lesser degree than the proposed project: increase the availability of housing in proximity to transit; identify future alternative uses for the Fremont School/Ballard Parent Center site; and maintain and enhance the pre-1872 community character of Old Town through land use and urban design policies and development regulations. The No Project Alternative would meet the following project objectives to the same degree as the project: enhance the Core Sub-District as the pedestrian-oriented commercial center of the community; improve the integration between the Core Sub-District and Old Town San Diego State Historic Park; enhance facilities and amenities within parks and recreation sites in the community; and maintain a balance between visitor-serving uses and residential uses.

b. Transportation and Circulation

The No Project Alternative would retain the adopted Community Plan's Circulation Element. The recommended physical improvements within the adopted Community Plan are listed in Table 8-6.

Table 8-6 No Project Alternative (Adopted Community Plan) Planned Circulation Improvements	
Improvement	Carried Forward in Proposed CPU?
Improve signal progression between Pacific Highway and Morena Boulevard.	Yes
Install a one-way couplet on Twiggs Street and Harney Street to be located between Juan Street and Congress Street, with Twiggs Street circulating toward the southwest and Harney Street circulating toward the northeast.	No
Install a four-way stop at Harney Street and San Diego Avenue.	This improvement has been implemented.
Widen sidewalks on San Diego Avenue between Twiggs Street and Congress Street to promote pedestrian activity.	Yes
Convert optional left turn lane on eastbound Taylor Street at Morena Boulevard to a mandatory left, creating a dual pocket.	No
Widen Presidio Drive to allow for a right turn on Taylor Street.	No
Remove parking for another 100-150 feet on Juan Street for the northbound approach of the Taylor Street intersection and restripe for two approach lanes.	No
Two hour parking posting limits should be installed along all of Wallace, Juan, and Calhoun Street, as well as the adjoining residential areas.	No ^a
Incorporate the State Park's plan to realign the one block of Congress Street/San Diego Avenue south of Taylor Street through the Pottery Village property.	This improvement has been implemented.

Source: Chen Ryan Associates 2017a; 2017b; City of San Diego 1987; 2017

^a While two hour parking limits are not specifically proposed along the above mentioned roadways, the proposed CPU includes a policy to encourage the use of parking management and supply strategies, one of which considers placing time limits on parking to encourage parking turnover in high demand areas of the community.

The adopted Community Plan proposes to implement a design for bikeway corridors (Class I) along Taylor Street and Pacific Highway to be regional facilities facilitating bicycle movement from the coastline to inland areas and to implement a design for bike routes through the historical with connections to adjacent communities. The adopted Community Plan also includes recommendations to create an environment that is fundamentally pedestrian in character and scale and encourage the development of comfortable walkways, separated where possible from vehicular routes.

The No Project Alternative would generate fewer vehicular trips than the project as it allows for fewer residential units than the project. The adopted Community Plan includes recommendations to improve vehicular circulation while promoting access for automobiles, public transit, pedestrians, and bicyclists, similar to the proposed CPU. However, several of the recommendations in the No Project Alternative are outdated as it discusses a future trolley station that now exists. The No Project Alternative also includes several recommendations related to automobile access, parking, and signage, and only a few related to public transit, bikeways, and pedestrian walkways, whereas the proposed CPU proposes tailored policies and improvements to enhance walking and bicycling connections to the Old Town Transit Center and important destinations within the community, reinforcing San Diego Avenue as the community's pedestrian-oriented main street, and establishing transit as a mode of choice for residents, employees,

and visitors. Thus, the No Project Alternative is outdated and would not support improving the mobility system to the same degree as the proposed CPU. While impacts to individual roadways and intersections would be lesser under the No Project Alternative than the project, these impacts would remain significant and unavoidable.

Regarding consistency with applicable plans and policies related to alternative transportation, the No Project Alternative would not include the proposed CPU policies that support increasing multi-modal opportunities within the proposed CPU area, consistent with the SANDAG ~~RP~~2015 Regional Plan, the General Plan, and the CAP, as all have been created or updated since the current Community Plan was adopted. Thus, while the No Project Alternative would not result in significant impacts related to conflicts with plans and policies addressing alternative transportation, the No Project Alternative would not achieve the level of consistency with these applicable plans and policies that the proposed CPU would achieve. Therefore, impacts related to alternative transportation would be less than significant and slightly greater with the No Project Alternative compared to the project. In summary, the No Project Alternative would meet the project objective of improving pedestrian and bicycle linkages to adjacent communities and amenities but to a lesser degree than the project.

c. Historical and Tribal Cultural Resources

The No Project Alternative would retain the adopted Old Town Community Plan land use map and policies, and the Historic Resources Survey Report and Cultural Constraints Analysis prepared for the project would be applicable regardless of whether or not the proposed CPU is adopted (refer to Section 5.3, Historical and Tribal Cultural Resources). The surveys, coupled with the City's Historical Resources Regulations, would provide for the regulation and protection of historical and tribal cultural resources; however, even with implementation of the mitigation framework, the degree of future impacts and applicability, feasibility, and success of future mitigation measures cannot be adequately known for each future specific project at this program level of analysis. Therefore, impacts to historical and tribal cultural resources under the No Project Alternative would be significant and unavoidable and similar to the project.

As with the project, future development under the No Project Alternative has the potential to result in significant direct and/or indirect impacts to prehistoric and historic archaeological resources and tribal cultural resources. Implementation of future projects under this alternative would require adherence to all applicable guidelines further described in Section 5.3, Historical and Tribal Cultural Resources. The extent of impacts to prehistoric and historic archaeological resources, and tribal cultural resources resulting from implementation of the No Project Alternative would be similar to those identified for the proposed CPU, because the extent and areas of disturbance by development would be generally the same and only the land use designation would change. As with the project, implementation of the No Project Alternative would result in similar impacts related to prehistoric and historic archaeological resources, and tribal cultural resources at the program level that would be significant and unavoidable, despite adherence to the existing regulatory framework.

As the policies under the No Project Alternative and the project both aim to preserve historical and cultural resources and since the reports and analysis prepared for the project would be applicable whether or not the proposed CPU is adopted, the No Project Alternative would meet the project objective

of preserving the community's historical, archaeological, and tribal cultural resources to the same degree as the project.

d. Geologic Conditions

Geologic impacts from implementation of the No Project Alternative would be similar to those of the project. Potential impacts related to seismic and geologic hazards, or to the instability of geological units and soils, would be avoided or reduced to less than significant through adherence to existing state and local regulations, including the SDMC and other standards. Where required, site-specific geotechnical investigations would be conducted to identify and evaluate seismic hazards and formulate mitigation measures prior to permitting most developments designed for human occupancy. Similarly, project-level compliance with City-mandated grading requirements, and compliance with applicable state regulations would ensure that future grading and construction activities would avoid significant soil erosion impacts. These requirements would apply equally to both the No Project Alternative and the project. Thus, impacts to geologic conditions under the No Project Alternative would be less than significant and similar to the project.

e. Noise

The No Project Alternative would retain the adopted Community Plan. Noise impacts under the No Project Alternative would be similar to the anticipated impacts of the project because, like the proposed CPU, the No Project Alternative would permit infill development that would be subject to construction noise and vibration and traffic noise as the planning area is built. The No Project Alternative would result in slightly lower development potential, average daily trips, and traffic noise compared to the proposed CPU. While the No Project Alternative does not contain the proposed CPU policy changes intended to improve compatibility with and implement General Plan policies, future development implemented under both the No Project Alternative and the project would be required to comply with applicable City and state noise regulations, including Title 24 building code requirements. The noise impacts of the No Project Alternative would be similar to the project, and both would result in similar significant and unavoidable impacts related to traffic noise exposure (ministerial projects) and construction noise and vibration impacts.

f. Health and Safety

Impacts under the No Project Alternative would be similar to the potential impacts under the project. Future development under the No Project Alternative has the potential to result in exposure to hazardous materials, wastes, emissions, airport hazards, and fire hazards. However, land uses under the No Project alternative would be similar to the land uses under the proposed CPU. Additionally, there would not be any land use changes that would increase potential exposure to hazards. Federal, state, and local regulations that serve to reduce impacts to a less than significant level would also reduce impacts for development under the No Project alternative. Health and safety impacts from the No Project Alternative would be less than significant and similar to those anticipated under the project.

g. Hydrology/Water Quality

The land use pattern and distribution for the No Project Alternative is generally the same as the proposed CPU. Future development under both the No Project Alternative and the project would be required to

comply with existing federal, state, and local regulations relative to runoff and water quality at the project level. Thus, hydrology and water quality impacts of the No Project Alternative would be less than significant and similar to the project.

h. Visual Effects and Neighborhood Character

Potential impacts to visual effects and neighborhood character under the No Project Alternative would be similar to those anticipated under the project, as the adopted Community Plan aims to reinforce the community's original physical environment and maintain and enhance existing hillsides. The No Project Alternative aims to maintain and recreate the "Pueblo" area by incorporating no setbacks to enhance the urban feel, the "Rancheria" area by incorporating larger setbacks with open landscaped frontages, and the "Rio" area by recreating riverine environments north of Taylor Street through development of water feature areas and use of riverine landscaping. The No Project Alternative would maintain the Architectural and Site Design Standards and Criteria document which provides design guidance for improvements and development projects. While the No Project Alternative includes policies to reduce potential neighborhood character impacts, the No Project Alternative would not benefit from the proposed Old Town CPU policies that are intended to improve the existing Old Town neighborhood character through the creation of street corridors and gateways to enhance key community corridors, and entrances and updated and clarified urban design guidelines related to historical and pedestrian-oriented architectural and site design, signage, and landscaping.

Additionally, the No Project Alternative would not include increased residential and mixed-use development and density near the Old Town Transit Center and the former Jefferson School that the proposed CPU includes. Therefore, potential exists for the No Project Alternative to be more consistent with the existing neighborhood character that is less dense. However, proposed CPU policies would ensure that higher-density development under the proposed CPU would be consistent with the existing neighborhood character. Thus, impacts of the No Project Alternative would be less than significant and similar to the project.

As the No Project Alternative and the project both include policies and design guidance to retain the community's historical character, the No Project Alternative would meet the project objective of maintaining and enhancing the pre-1872 community character of Old Town to the same degree as the project.

i. Air Quality and Odors

The No Project Alternative would retain the adopted Community Plan. Air Quality impacts under this alternative would be similar to the anticipated impacts of the proposed CPU. For the adopted Community Plan, emissions from area (architectural coatings and hearths) and mobile sources (vehicle trips associated with residents, workers, and visitors to the area) constitute the majority of the operational emissions. The adopted Community Plan would generate two percent fewer vehicle miles traveled than the proposed CPU, and would contain fewer dwelling units than the proposed CPU. Thus, like the proposed CPU, the No Project Alternative would not conflict with or obstruct implementation of the applicable air quality plan nor would it result in a violation of any air quality standard or contribute substantially to an existing or projected air quality violation because the land uses under the adopted Community Plan would be consistent with the RAQS. Like the proposed CPU, the No Project Alternative would not create objectionable odors affecting a substantial number of people, and the residents would

not be impacted by any existing odor sources. Thus, air quality and odor impacts from the No Project Alternative would be less than significant and similar to the project.

j. Greenhouse Gas Emissions

The No Project Alternative (adopted Community Plan) would retain the adopted Community Plan, which includes more institutional and single family residential land uses than the proposed CPU. In 2035, operation of the No Project Alternative would result in 31,006,696 MT CO₂e per year. Although the No Project Alternative incorporates similar overall goals as the proposed CPU, the adopted Community Plan would generate approximately 6093,775 MT CO₂e per year ~~more~~ less than the proposed CPU. While the No Project Alternative would not result in significant impacts related to conflicts with plans and policies addressing GHGs, the No Project Alternative would not achieve the level of consistency with the Climate Action Plan that the proposed CPU would achieve. Thus, impacts related to GHG from the No Project Alternative would be slightly greater than the project but still less than significant.

k. Public Services and Facilities

The No Project Alternative would retain the adopted Community Plan. Impacts to public services and facilities under this alternative would be less than the anticipated impacts associated with the proposed CPU because the anticipated 2035 population under the proposed Old Town CPU (2,430) is more than double the anticipated 2035 population under the No Project Alternative (985).

For police and fire protection services, as population growth occurs (current population is 830), there will be a need for new facilities. Thus, while the No Project Alternative could result in the demand for new or altered police and fire protection services, no construction of such facilities is included in the No Project Alternative or the project. For schools, under both the No Project Alternative and the project, future additional housing units suggested in the No Project Alternative and the project would likely impact schools. However, the school district would be responsible for potential expansion of development of new facilities. Thus, for the No Project Alternative, physical public facilities and service impacts would be less than significant and similar to the project.

However, in the case of the proposed CPU, the projected additional residential population would increase the need for population-based parks and the need to build new parks and park equivalencies, whereas the existing parks in the community would meet the future residential population anticipated in the adopted Community Plan. While population-based parks and the need to build new parks and park equivalencies are identified in the proposed CPU (see Section 5.11), no specific facilities have been identified in the proposed CPU; therefore, no specific impacts can be identified. Thus, for the No Project Alternative, public facilities and services impacts would be less than significant and slightly less than the project.

As such, the No Project Alternative would implement the project objective to enhance facilities and amenities within parks and recreation sites in the community to the same degree as the project.

l. Public Utilities

The No Project Alternative would retain the adopted Community Plan. Impacts to public utilities under this alternative would be similar to the anticipated impacts of the proposed CPU. As the No Project Alternative

would have a lower anticipated population than the proposed CPU (see Table 8-5) and therefore less associated construction, implementation of the No Project Alternative would have less solid waste generation. Thus, for the No Project Alternative impacts related to storm water, sewer, water distribution, communications systems, and solid waste and recycling would be less than significant and slightly less than the project.

m. Biological Resources

Under the No Project Alternative, the areas that would experience growth and development are already developed and do not support biological resources, similar to the proposed CPU. Implementation of the No Project Alternative would require adherence to all applicable federal, state, and local regulations regarding the protection of biological resources, as for all subsequent development project submittals under the proposed CPU. Thus, impacts to biological resources from the No Project Alternative would be less than significant and similar to the project.

n. Paleontological Resources

As with the project, future development under the No Project Alternative has the potential to result in significant direct and/or indirect impacts to paleontological resources. Implementation of future projects under this alternative would require adherence to all applicable guidelines further described in Section 5.14, Paleontological Resources. The extent of impacts to paleontological resources resulting from implementation of the No Project Alternative would be similar to those identified for the proposed CPU, because the extent and areas of disturbance by development would be generally the same and only the land use designation would change. As with the proposed CPU, implementation of the No Project Alternative would result in potentially significant impacts related to paleontological resources at the program level because adherence to the mitigation framework cannot be guaranteed for ministerial projects that only require a grading permit. Thus, impacts to paleontological resources from the No Project Alternative would be significant and unavoidable and similar to the project.

8.2 Alternative 1

8.2.1 Description

Land uses proposed under Alternative 1 would result in less residential density than the project, specifically west of Pacific Highway (residential is permitted for 0-36 du/ac under Alternative 1 versus permitted for 0-73 du/ac under the proposed CPU), south of Congress Street (0-25 du/ac under Alternative 1 versus 0-36 du/ac under the proposed CPU), and in the Hortensia District (0-25 du/ac under Alternative 1 versus 0-54 du/ac under the proposed CPU). Under Alternative 1, the density of future development would be increased to 29 dwelling units per acre (du/ac) in the Congress and Hortensia sub-districts generally southeast of Ampudia Street, and the Taylor Sub-District would change from Community Commercial – Residential Prohibited to Community Commercial – Residential Permitted at 36 du/ac. The alternative includes all the other discretionary actions and proposed policies in the proposed CPU.

When compared to the proposed CPU, Alternative 1 reduces residential density development potential along Jefferson Street, San Diego Avenue, Arista Street, Ampudia Street, Old Town Avenue, and Hortensia Street from densities ranging from 36 to 54 du/ac, to 29 du/ac. When compared to the

proposed CPU, Alternative 1 increases residential density development potential in the Congress and Hortensia sub-districts generally southeast of Ampudia Street.

The total projected population under Alternative 1 would be 830 persons less than under the project. Figure 8-2 shows land use designations under Alternative 1 and Table 8-7 shows the differences between dwelling units and commercial square footage between Alternative 1 and the proposed CPU.

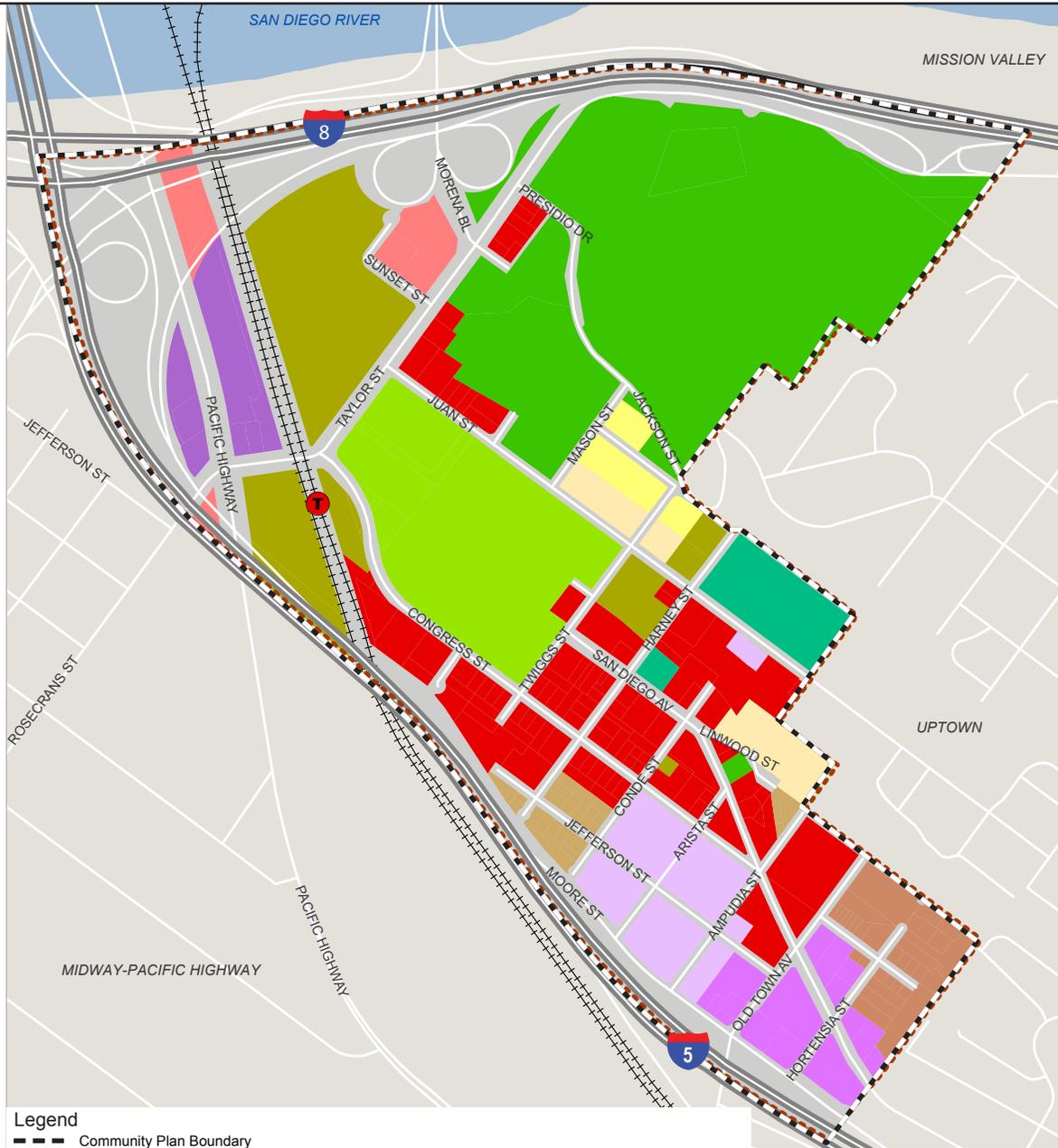
Alternative 1				Proposed Old Town CPU			
Land Use	Acres	Dwelling Units	Floor Area	Land Use	Acres	Dwelling Units	Floor Area
Retail Commercial	25.5	349	417,870	Retail Commercial	25.8	758	399,400
Communications and Utilities	0.9	0	0	Communications and Utilities	0.9	0	0
Hotel	10.4	0	394,575	Hotel	10.4	0	394,575
Institutional	2.4	0	45,620	Institutional	2.4	0	45,620
Military	0	0	0	Military	0	0	0
Office	24.0	0	578,260	Office	23.9	48	565,730
Parking Lot	2.7	0	0	Parking Lot	2.7	0	0
Parks and Open Space	65.7	0	7,114	Parks and Open Space	65.7	0	7,114
Residential - Multi Family	14.5	458	0	Residential - Multi Family	15.8	520	0
Residential - Single Family	6.5	118	0	Residential - Single Family	5.0	79	0
Self-Storage	0.4	0	20,000	Self-Storage	0.4	0	20,000
Tourist Attraction	22.7	0	15,029	Tourist Attraction	22.7	0	15,029
Transit Center	4.9	0	3,882	Transit Center	4.9	0	3,882
Transportation	93.7	0	0	Transportation	93.7	0	0
Undevelopable Natural Area	0.4	0	0	Undevelopable Natural Area	0.4	0	0
Totals	274.67	925	1,482,350	Totals	274.67	1,405	1,451,350
Estimated Future Population = 1,600				Estimated Future Population = 2,430			

8.2.2 Analysis of Alternative 1

a. Land Use

As shown in Table 8-7, the number of acres for each land use under Alternative 1 and the proposed CPU are similar. Therefore, the primary difference between the two alternatives is less permitted density under Alternative 1 when compared to the project. This includes lower permitted residential densities in the Core Sub-District; greater mixed commercial residential land uses but at lower residential densities than the project (Alternative 1: 0-25 du/ac and 0-29 du/ac compared to project: 0-54 du/ac); additional mixed commercial residential land uses in the Taylor Sub-District, whereas the project retains industrial but permits a higher density (Alternative 1: 0-36 du/ac compared to project: 0-73 du/ac). Alternative 1 would also permit lower densities in the Linwood and Jefferson sub-districts than the project. To summarize, Alternative 1 incorporates the same overall goals and policies as the proposed Old Town CPU, but would result in similar amounts of land for residential uses (see Retail Commercial and Residential Land Uses in Table 8-7) but less residential units due to decreased densities (Alternative 1: 925 vs. project: 1,405).

Land use impacts under Alternative 1 would be greater than the anticipated impacts of the project because Alternative 1 would implement the General Plan's City of Villages strategy to a lesser degree than the proposed CPU. Implementation of Mixed Commercial Residential and Residential land uses



Legend

--- Community Plan Boundary

Alternative 1 Land Use Designations

- | | | | |
|--|--|--|---|
| | Residential - Low (5-9 du/ac) | | Community Commercial - Residential Prohibited |
| | Residential - Low Medium (10-15 du/ac) | | Community Commercial - Residential Permitted (0-25 du/ac) |
| | Residential - Medium (16-25 du/ac) | | Institutional |
| | Residential - Medium (16-29 du/ac) | | Park - State |
| | Mixed Commercial Residential - Medium (0-25 du/ac) | | Park - County |
| | Mixed Commercial Residential - Medium (0-29 du/ac) | | Park - City |
| | Mixed Commercial Residential - Medium (0-36 du/ac) | | |

Copyright 2012 SanGIS - All Rights Reserved.
 Full text of this legal notice can be found at:
http://www.sangis.org/Legal_Notice.htm



0 400 800 1,600 Feet

Figure 8-2
Alternative 1 Land Use

under Alternative 1, as compared to the Mixed Commercial, Community Commercial – Residential Permitted, and Residential land uses and their increase residential densities under the project would implement General Plan Policy LU-A.1(d) (Revitalize transit corridors through the application of plan designations and zoning that permits a higher intensity of mixed use development) to a lesser degree than the proposed CPU. Although Alternative 1 would not conflict with adopted land use plans, policies, or ordinances, and would result in a less than significant land use impact overall, this alternative would be less compatible than the proposed CPU with applicable land use plans and policies. Thus, land use impacts of Alternative 1 would be less than significant and slightly greater than the project.

In summary, Alternative 1 would meet the following project objectives to a lesser degree than the proposed project: increase the availability of housing in proximity to transit; and maintain a balance between visitor-serving uses and residential uses as there are less residential units proposed in proximity to the Old Town Transit Center under Alternative 1 than the project. The No Project Alternative would meet the following project objectives to the same degree as the project: maintain and enhance the pre-1872 community character of Old Town through land use and urban design policies and development regulations; identify future alternative uses for the Fremont School/Ballard Parent Center site; enhance the Core Sub-District as the pedestrian-oriented commercial center of the community; improve the integration between the Core Sub-District and Old Town San Diego State Historic Park; and enhance facilities and amenities within parks and recreation sites in the community as the policies related to those project objectives would be incorporated under both Alternative 1 and the project.

b. Transportation and Circulation

Alternative 1 would generate fewer vehicular trips than the project as it allows for fewer residential units than the project. Similar to the proposed CPU, Alternative 1 would result in significant and unavoidable impacts to roadways, intersections, freeway segments, and freeway ramp meters. The number of significantly impacted roadway segments, intersections, freeway segments, and freeway ramps would be the same as the proposed CPU. Therefore, Alternative 1 impacts to roadway and freeway facilities would be significant and unavoidable, but slightly less than the project.

Regarding consistency with applicable plans and policies related to alternative transportation, Alternative 1 would include the same planned mobility improvements and the same Mobility policies as in the proposed CPU, including those that support increasing multi-modal opportunities within the proposed CPU area consistent with the SANDAG RP, 2015 Regional Plan, the General Plan, and the City's CAP. Thus, similar to the proposed CPU, Alternative 1 would not result in significant impacts related to conflicts with plans and policies addressing alternative transportation. Thus, Alternative 1 impacts related to alternative transportation would be less than significant and similar to the project.

Therefore, Alternative 1 would implement the project objectives: to improve pedestrian and bicycle linkages to adjacent communities and amenities including the San Diego River and Old Town Transit Center; and to enhance the Core Sub-District as the pedestrian-oriented commercial center of the community to the same degree as the project.

c. Historical and Tribal Cultural Resources

Like the project, Alternative 1 would identify potential historic properties and associated policies supporting protection of potential historic properties, and would limit how and where modifications can be

made to existing properties. The mitigation framework combined with the proposed CPU policies promoting the identification and preservation of historical resources would reduce the program-level impact related to historical resources of the built environment. However, even with implementation of the mitigation framework, the degree of future impacts and applicability, feasibility, and success of future mitigation measures cannot be adequately known for each specific future project at this program level of analysis. Therefore, as with the project, where increases in density are proposed beyond the adopted Community Plan and current zoning, potential impacts from Alternative 1 to individual historic buildings, structures, objects, or sites would be significant and unavoidable and similar to the project.

As with the project, future development under Alternative 1 has the potential to result in significant direct and/or indirect impacts to tribal cultural and archaeological resources. Implementation of future projects under Alternative 1 would require adherence to all applicable guidelines further described in Section 5.3, Historical and Tribal Cultural Resources. The extent of impacts to tribal cultural and archaeological resources resulting from implementation of Alternative 1 would be similar to those identified for the proposed CPU, as there is limited undeveloped land. However, similar to the proposed CPU, while existing regulations, the SDMC, and proposed CPU policies would provide for the regulation and protection of tribal cultural and archaeological resources, including human remains, it is impossible to ensure the successful preservation of all tribal cultural and archaeological resources. As with the project, implementation of Alternative 1 would result in similar impacts related to tribal cultural and archaeological resources at the program level and impacts would be significant and unavoidable.

As the policies under Alternative 1 and the project both aim to preserve historical and cultural resources, Alternative 1 would meet the project objective of preserving the community's historical, archaeological, and tribal cultural resources to the same degree as the project.

d. Geologic Conditions

Geologic impacts from implementation of Alternative 1 would be similar to those of the project. Potential impacts related to seismic and geologic hazards, or to the instability of geological units and soils would be avoided or reduced to less than significant through adherence to existing state and local regulations, including the SDMC and other standards. Where required, site-specific geotechnical investigations would be conducted to identify and evaluate seismic hazards and formulate mitigation measures prior to permitting most developments designed for human occupancy. Similarly, project-level compliance with City-mandated grading requirements and compliance with applicable state and/or federal regulations would ensure that future grading and construction activities would avoid significant soil erosion impacts. These requirements would apply equally to both Alternative 1 and the project. Thus, impacts to geologic conditions under Alternative 1 would be less than significant and similar to the project.

e. Noise

Noise impacts under Alternative 1 would be similar to the anticipated impacts of the project because, like the proposed CPU, Alternative 1 would permit development that would be subject to construction noise and vibration and traffic noise, as the planning area is built out. Alternative 1 would result in lower development potential and average daily trips; therefore, no increase in traffic noise would occur compared to the project. Alternative 1 contains the proposed CPU policy changes intended to improve compatibility with and implement the General Plan policies; therefore, future development implemented under both Alternative 1 and the project would be required to comply with applicable City and state noise

regulations, including Title 24 building code requirements. Thus, the noise impacts of Alternative 1 would be similar to the project and both would result in significant and unavoidable impacts related to traffic noise exposure (ministerial projects) and construction noise and vibration impacts.

f. Health and Safety

Health and safety impacts from Alternative 1 would be similar to the potential impacts under the project. Future development under Alternative 1 has the potential to result in exposure to hazardous materials, wastes, emissions, airport hazards, and fire hazards. Federal, state, and local regulations that serve to reduce impacts to a less than significant level for the proposed CPU would also address impacts under Alternative 1. Thus, Alternative 1 health and safety impacts would be less than significant and similar to those anticipated under the project.

g. Hydrology/Water Quality

The land use pattern for Alternative 1 is generally the same as for the proposed CPU. However, there is potential for slightly less or more impervious pavement under Alternative 1 due to fewer residential dwelling units and a slightly greater square footage of non-residential space (approximately 30,000 more square feet than the proposed CPU), when compared to the project. Future development under both Alternative 1 and the project would be required to comply with existing federal, state, and local regulations relative to runoff and water quality at the project level. Thus, the hydrology and water quality impacts of Alternative 1 would be less than significant and similar to the project.

h. Visual Effects and Neighborhood Character

Potential impacts to visual effects and neighborhood character under Alternative 1 would be similar to those anticipated under the project. Alternative 1 is similar to the proposed CPU densities, and like the proposed CPU, would generally produce similar bulk and scale of development. Alternative 1 would also include proposed CPU policies that reduce the impact of future development on community character and related visual effects so that the overall impact in the community would be less than significant and similar to the project.

As Alternative 1 and the project both include policies and design guidance to retain the community's historical character, Alternative 1 would meet the project objective of maintain and enhancing the pre-1872 community character of Old Town to the same degree as the project.

i. Air Quality and Odors

Air quality impacts under Alternative 1 would be slightly less than the anticipated impacts of the project, due to less residential development and fewer vehicle miles traveled than the proposed CPU. Alternative 1 would generate approximately two percent less vehicle miles traveled than the proposed CPU, which would generate slightly lower daily operational emissions than the project. Because Alternative 1 would include less residential development than the proposed CPU, Alternative 1 is anticipated to result in fewer emissions from architectural coatings and usage of hearths. Like the proposed CPU, Alternative 1 would not conflict with or obstruct implementation of the applicable air quality plan nor would it result in a violation of any air quality standard or contribute substantially to an existing or projected air quality violation, because the emissions would be consistent with assumptions and emissions forecasts used in

the development of the RAQS. Like the proposed CPU, Alternative 1 would not create objectionable odors affecting a substantial number of people, and residents would not be impacted by any existing odor sources. Thus, Alternative 1 air quality impacts would be less than significant and slightly less than the project.

j. Greenhouse Gas Emissions

GHG impacts under Alternative 1 would be less than significant and slightly greater than the project. Alternative 1 would incorporate similar overall goals as the proposed CPU, such as locating additional residential land uses close to transit and residential uses mixed with commercial uses to be consistent with the General Plan's City of Villages strategy and CAP strategies. However, the proposed CPU allows for more residential density in mixed-use districts and in proximity to transit services, consistent with the City of Villages strategy and CAP strategies. While Alternative 1 would not conflict with CAP Strategies and the General Plan's City of Villages strategy, it would achieve the associated strategies and policies to a lesser extent. Thus, although Alternative 1 would not conflict with adopted plans or policies designed to reduce GHGs, and would result in a less than significant GHG impact overall, Alternative 1 would be less compatible than the project when viewed in relation to applicable GHG plans and policies.

k. Public Services and Facilities

Impacts to public services and facilities under Alternative 1 would be less than the anticipated impacts associated with the project because the anticipated population under the proposed CPU in 2035 (2,430) is greater than the anticipated population under Alternative 1 in 2035 (1,600). For police and fire protection services, projected population growth (current population is 830) could result in the need for new or expanded services or facilities. While Alternative 1 could result in less demand for new or altered police and fire protection services than the proposed CPU, no construction of such facilities are included in Alternative 1 or the proposed CPU. For schools, under both Alternative 1 and the proposed CPU, future additional housing units suggested in Alternative 1 and the proposed CPU would likely impact district schools. However, the school district would be responsible for potential expansion of development of new facilities. Thus, for Alternative 1, public facilities and services impacts would be less than significant and less than the project.

In the case of both Alternative 1 and the proposed CPU, there would be no deficit in planned population-based parks based on General Plan standards. ~~As the parks deficit would be the same for both Alternative 1 and the project, Alternative 1 and the project would implement the project objective of identifying park and recreation facilities to serve the community to the same degree.~~ As with the proposed CPU, implementation of Alternative 1 would provide policy support for increasing the acreage of population-based parks and recreational facilities in the proposed CPU area, but does not propose design and construction of new facilities, so no impacts can be analyzed. As with the proposed CPU, individual park projects under Alternative 1 could require a project-level analysis at the time they are proposed, based on the details of the parks and the existing conditions at the time such projects are pursued. As such, implementation of Alternative 1 would result in a less than significant impact associated with the construction of new facilities.

I. Public Utilities

Like the project, Alternative 1 contains the proposed CPU policies and land use changes intended to improve compatibility with and implement the General Plan, and encourage efficient use and conservation of energy and water resources, implementation of public and private storm water management infrastructure, and solid waste reduction through recycling and composting. Since the anticipated population under Alternative 1 in 2035 is lower than the anticipated population of the proposed CPU in 2035, there would be less construction associated with Alternative 1. As such, implementation of Alternative 1 would result in less solid waste generation compared to the project. As discussed in Section 5.12, Public Utilities, the implementation of the proposed CPU would not result in significant impacts to storm water, sewer, water distribution, communications systems, and solid waste and recycling. It is anticipated that the population in Alternative 1 would be approximately 830 fewer people than the project. Thus, for Alternative 1, impacts related to storm water, sewer, water distribution, communications systems, and solid waste and recycling would be less than significant and slightly less than the project.

m. Biological Resources

Like the project, Alternative 1 would result in land uses changes that would affect primarily developed areas, and therefore, would result in similar impacts to biological resources as those anticipated under the proposed CPU. Implementation of Alternative 1 would also require adherence to all applicable federal, state, and local regulations regarding the protection of biological resources, as for all subsequent development project submittals under the proposed CPU. Therefore, impacts to biological resources under Alternative 1 would be less than significant and similar to those identified for the project.

n. Paleontological Resources

As with the project, future development under Alternative 1 has the potential to result in significant direct and/or indirect impacts to paleontological resources. Implementation of future projects under Alternative 1 would require adherence to all applicable guidelines further described in Section 5.14, Paleontological Resources. The extent of impacts to paleontological resources resulting from implementation of Alternative 1 would be similar to those identified for the proposed CPU, because the extent and areas of disturbance by development would be generally the same and only the land use designation would change. As with the proposed CPU, implementation of Alternative 1 would result in potentially significant impacts related to paleontological resources at the program level. Strict adherence to the Mitigation Framework would still be required to reduce potential impacts; however, impacts to paleontological resources associated with future ministerial development under Alternative 1 would remain significant and unavoidable and similar to the project.

8.3 Alternative 2

8.3.1 Description

Land uses proposed under Alternative 2 would result in less residential density than the proposed CPU, specifically west of Pacific Highway (residential is prohibited under Alternative 2 versus permitted for 0-73 du/ac under the proposed CPU), south of Congress Street (0-25 du/ac under Alternative 2 versus 0-36 du/ac under the proposed CPU), and in the Hortensia District (0-25 du/ac under Alternative 2 versus 0-54

du/ac under the proposed CPU). It does not include the increased residential density in the Congress and Hortensia sub-districts or the change from residential prohibited to residential permitted in the Taylor Sub-District, as proposed under Alternative 1. Table 8-8 presents a summary comparison of the proposed CPU and Alternative 2 for residential capacity and reasonably anticipated non-residential development. As shown, Alternative 2 would reduce multi-family development potential, result in a slight increase in area developed with single family residential uses and institutional uses, and slightly reduce the number of dwelling units allowed in conjunction with commercial – retail land uses.

Alternative 2				Proposed Old Town CPU			
Land Use	Acres	Dwelling Units	Floor Area	Land Use	Acres	Dwelling Units	Floor Area
Retail Commercial	20.5	162	388,700	Retail Commercial	25.8	758	399,400
Communications and Utilities	0.9	0	0	Communications and Utilities	0.9	0	0
Hotel	12.2	0	426,152	Hotel	10.4	0	394,575
Institutional	2.4	0	45,620	Institutional	2.4	0	45,620
Military	2.9	0	56,359	Military	0	0	0
Office	24.2	0	583,544	Office	23.9	48	565,730
Parking Lot	2.7	0	0	Parking Lot	2.7	0	0
Parks and Open Space	65.7	0	7,114	Parks and Open Space	65.7	0	7,114
Residential - Multi Family	14.5	445	0	Residential - Multi Family	15.8	520	0
Residential - Single Family	6.5	118	0	Residential - Single Family	5.0	79	0
Self-Storage	0.4	0	20,000	Self-Storage	0.4	0	20,000
Tourist Attraction	22.7	0	15,029	Tourist Attraction	22.7	0	15,029
Transit Center	4.9	0	3,882	Transit Center	4.9	0	3,882
Transportation	93.7	0	0	Transportation	93.7	0	0
Undevelopable Natural Area	0.4	0	0	Undevelopable Natural Area	0.4	0	0
Totals	274.6	725	1,546,400	Totals	274.6	1,405	1,451,350
Estimated Future Population = 1,280				Estimated Future Population = 2,430			

The total projected population under Alternative 2 would be 1,150 persons less than the proposed CPU. Figure 8-3 shows land use designations under Alternative 2, and Table 8-8 shows the differences between dwelling units and commercial square footage between Alternative 2 and the proposed CPU.

8.3.2 Analysis of Alternative 2

a. Land Use

As shown in Table 8-8, the number of acres for each land use under Alternative 2 and the proposed CPU are similar. Therefore, the primary difference between the two alternatives is less permitted density under Alternative 2 when compared to the project. This includes no residential uses allowed in the Taylor Sub-District whereas the project permits Mixed Commercial Residential at 0-73 du/ac and less dense Mixed Commercial Residential in the Hortensia Sub-District. Alternative 2 would also permit lower densities in the Linwood and Jefferson sub-districts than the project. To summarize, Alternative 2 incorporates the same overall goals and policies as the proposed Old Town CPU, but would result in similar amounts of land for residential uses (see Retail Commercial and Residential Land Uses in Table 8-8) but less residential units due to decreased densities (Alternative 2: 725 vs. project: 1,405).

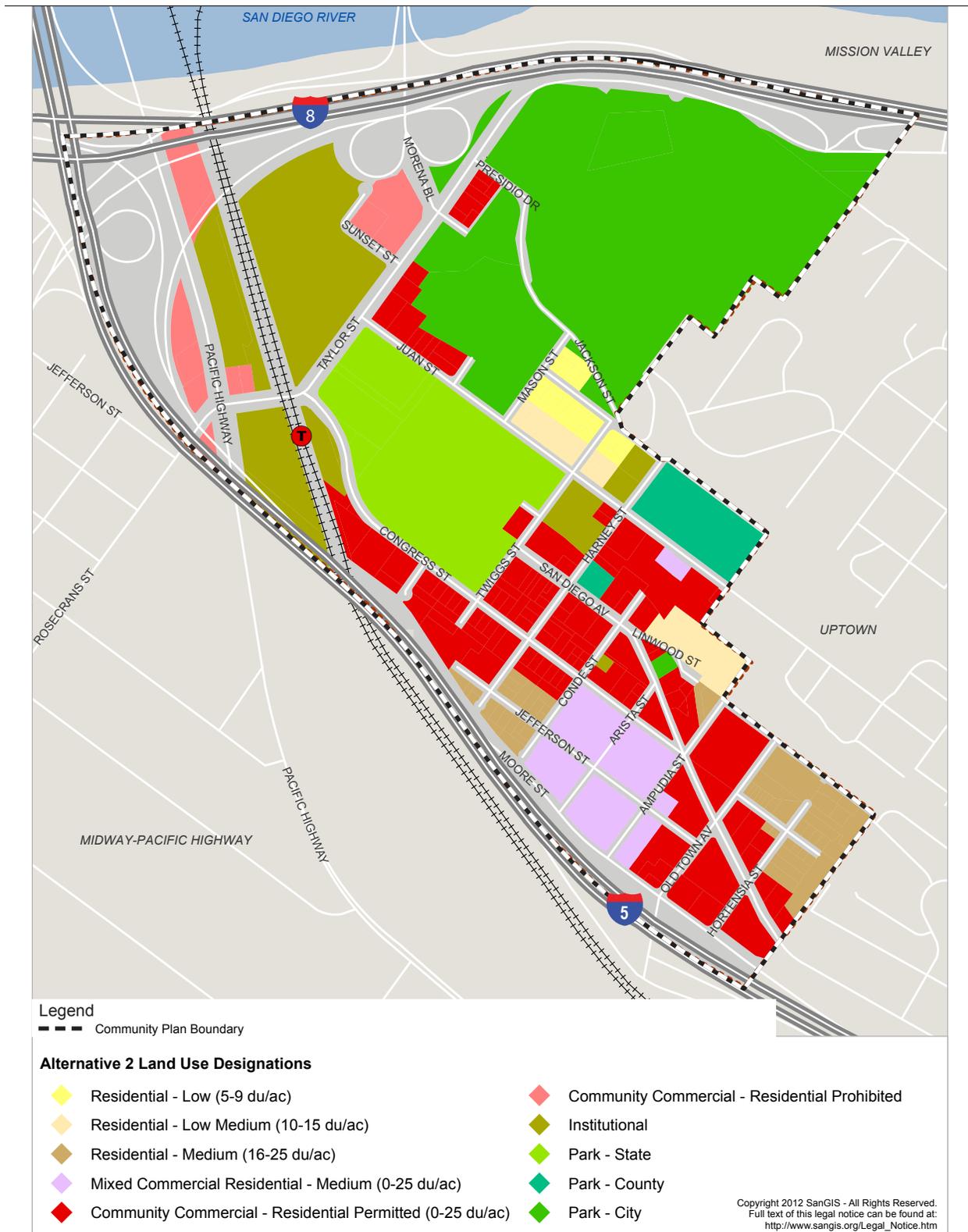


Figure 8-3
Alternative 2 Land Use

Land use impacts under Alternative 2 would be greater than the anticipated impacts of the project because Alternative 2 would implement the General Plan's City of Villages strategy to a lesser degree than the proposed CPU. Implementation of Mixed Commercial Residential and Residential land uses under Alternative 2, as compared to the Mixed Commercial, Community Commercial – Residential Permitted, and Residential land uses and their increase residential densities under the project would implement General Plan Policy LU-A.1(d) (Revitalize transit corridors through the application of plan designations and zoning that permits a higher intensity of mixed use development) to a lesser degree than the proposed CPU. Although Alternative 2 would not conflict with adopted land use plans, policies, or ordinances, and would result in a less than significant land use impact overall, this alternative would be less compatible than the proposed CPU with applicable land use plans and policies. Thus, land use impacts of Alternative 2 would be less than significant and slightly greater than the project.

In summary, Alternative 2 would meet the following project objectives to a lesser degree than the proposed project: increase the availability of housing in proximity to transit; and maintain a balance between visitor-serving uses and residential uses as there are less residential units proposed in proximity to the Old Town Transit Center under Alternative 2 than the project. The No Project Alternative would meet the following project objectives to the same degree as the project: maintain and enhance the pre-1872 community character of Old Town through land use and urban design policies and development regulations; identify future alternative uses for the Fremont School/Ballard Parent Center site; enhance the Core Sub-District as the pedestrian-oriented commercial center of the community; improve the integration between the Core Sub-District and Old Town San Diego State Historic Park; and enhance facilities and amenities within parks and recreation sites in the community as the policies related to those project objectives would be incorporated under both Alternative 2 and the project.

b. Transportation and Circulation

Alternative 2 would generate fewer vehicular trips than the project as it allows for fewer residential units than the project. Similar to the project, Alternative 2 would result in the same number of significantly impacted roadways, intersections, freeway segments, and ramp meters. Therefore, impacts to roadway and freeway facilities under Alternative 2 would be significant and unavoidable, but slightly less than the project.

Regarding consistency with applicable plans and policies related to alternative transportation, Alternative 2 would include the same planned mobility improvements and the same Mobility policies as in the proposed CPU, including those that support increasing multi-modal opportunities within the proposed CPU area, consistent with the SANDAG RP, 2015 Regional Plan, the General Plan, and the CAP. Thus, similar to the proposed CPU, Alternative 2 would not result in significant impacts related to conflicts with plans and policies addressing alternative transportation. Thus, Alternative 2 impacts related to alternative transportation would be less than significant and similar to the project.

Therefore, Alternative 2 would implement the project objectives: to improve pedestrian and bicycle linkages to adjacent communities and amenities including the San Diego River and Old Town Transit Center; and to enhance the Core Sub-District as the pedestrian-oriented commercial center of the community to the same degree as the project.

c. Historical and Tribal Cultural Resources

Like the project, Alternative 2 would identify potential historic properties and associated policies supporting protection of potential historic properties, and would limit how and where modifications can be made to existing properties. The mitigation framework combined with the proposed CPU policies promoting the identification and preservation of historical resources would reduce the program-level impact related to historical resources of the built environment. However, even with implementation of the mitigation framework, the degree of future impacts and applicability, feasibility, and success of future mitigation measures cannot be adequately known for each specific future project at this program level of analysis. Therefore, as with the project, where increases in density are proposed beyond the adopted Community Plan and current zoning, potential impacts to individual historic buildings, structures, objects, or sites would be significant and unavoidable and similar to the project.

As with the project, future development under Alternative 2 has the potential to result in significant direct and/or indirect impacts to tribal cultural and archaeological resources. Implementation of future projects under this alternative would require adherence to all applicable guidelines further described in Section 5.3, Historical and Tribal Cultural Resources. The extent of impacts to tribal cultural and archaeological resources resulting from implementation of Alternative 2 would be similar to those identified for the proposed CPU, as there is limited undeveloped land. However, similar to the proposed CPU, while existing regulations, the SDMC, and proposed CPU policies would provide for the regulation and protection of tribal cultural and archaeological resources, including human remains, it is impossible to ensure the successful preservation of all tribal cultural and archaeological resources. As with the project, implementation of Alternative 2 would result in similar impacts related to tribal cultural and archaeological resources at the program level that would be significant and unavoidable.

As the policies under Alternative 2 and the project both aim to preserve historical and cultural resources, Alternative 2 would meet the project objective of preserving the community's historical, archaeological, and tribal cultural resources to the same degree as the project.

d. Geologic Conditions

Geologic impacts from implementation of Alternative 2 would be similar to those of the project. Potential impacts related to seismic and geologic hazards, or to the instability of geological units and soils would be avoided or reduced to less than significant through adherence to existing state and local regulations, including the SDMC and other standards. Where required, site-specific geotechnical investigations would be conducted to identify and evaluate seismic hazards and formulate mitigation measures prior to permitting most developments designed for human occupancy. Similarly, project-level compliance with City-mandated grading requirements, and compliance with applicable state and/or federal regulations would ensure that future grading and construction activities would avoid significant soil erosion impacts. These requirements would apply equally to both Alternative 2 and the project. Thus, impacts to geologic conditions under Alternative 2 would be less than significant and similar to the project.

e. Noise

Noise impacts under Alternative 2 would be similar to the anticipated impacts of the project because, like the proposed CPU, Alternative 2 would permit development that would be subject to construction noise and vibration and traffic noise as the planning area is built out. Alternative 2 would result in lower

development potential and average daily trips; therefore, no increase would occur in traffic noise compared to the project. Alternative 2 contains the proposed CPU policy changes intended to improve compatibility with and implement the General Plan policies; therefore, future development implemented under both Alternative 2 and the project would be required to comply with applicable City and state noise regulations, including Title 24 building code requirements. Thus, the noise impacts of Alternative 2 would be similar to the project and both would result in significant and unavoidable impacts related to traffic noise exposure (ministerial projects) and construction noise and vibration impacts.

f. Health and Safety

Impacts under Alternative 2 would be similar to the potential impacts under the project. Future development under Alternative 2 has the potential to result in exposure to hazardous materials, wastes, emissions, airport hazards, and fire hazards. However, land uses under Alternative 2 would be similar to the land uses under the proposed CPU. Federal, state, and local regulations that serve to reduce impacts to a less than significant level would also reduce impacts for development under Alternative 2. Overall, Alternative 2 health and safety impacts would be less than significant and similar to those anticipated under the project.

g. Hydrology/Water Quality

The land use pattern for Alternative 2 is generally the same as the proposed CPU. However, there is potential to have slightly less or more impervious pavement under Alternative 2 due to a reduced number of dwelling units and increased non-residential square footage, compared to the project. Future development under both Alternative 2 and the project would be required to comply with existing federal, state, and local regulations relative to runoff and water quality at the project level. Thus, impacts to hydrology and water quality under Alternative 2 would be less than significant and similar to the project.

h. Visual Effects and Neighborhood Character

Potential impacts to visual effects and neighborhood character under Alternative 2 would be similar to those anticipated under the project. Alternative 2 is similar to the proposed CPU densities and, like the proposed CPU, would generally produce similar bulk and scale development. Alternative 2 would also include proposed CPU policies that reduce the impact of future development on community character and related visual effects so that the overall impact in the community would be less than significant and similar to the project.

As Alternative 2 and the project both include policies and design guidance to retain the community's historical character, Alternative 2 would meet the project objective of maintain and enhancing the pre-1872 community character of Old Town to the same degree as the project.

i. Air Quality and Odors

Air quality impacts under Alternative 2 would be slightly less than the anticipated impacts of the project, due to less residential development than the proposed CPU. As explained previously, area and mobile sources generate the majority of daily operational emissions. Alternative 2 would generate fewer vehicle miles traveled than the proposed CPU and thus, is anticipated to result in less mobile source emissions than the proposed CPU. Because Alternative 2 would include less residential development than the

proposed CPU, Alternative 2 is anticipated to result in fewer emissions from architectural coatings and usage of hearths. Like the proposed CPU, Alternative 2 would not conflict with or obstruct implementation of the applicable air quality plan nor would it result in a violation of any air quality standard or contribute substantially to an existing or projected air quality violation, because the emissions would be consistent with assumptions and emissions forecasts used in the development of the RAQS. Alternative 2 would generate fewer vehicle miles traveled; therefore, it is anticipated to generate fewer operational emissions than the proposed CPU. Like the proposed CPU, Alternative 2 would not create objectionable odors affecting a substantial number of people, and residents would not be impacted by any existing odor sources. Thus, Alternative 2 air quality impacts would be less than significant and slightly less than the project.

j. Greenhouse Gas Emissions

GHG impacts under Alternative 2 would be less than significant and slightly greater than the project. Alternative 2 would incorporate similar overall goals as the proposed Old Town CPU, such as locating residential land uses closer to transit and within mixed commercial residential development, consistent with the General Plan's City of Villages y and CAP strategies. However, the proposed CPU allows for more residential uses and increased density, which further implements CAP strategies. While Alternative 2 would not conflict with CAP Strategies and the General Plan's City of Villages strategy, it would achieve the associated strategies and policies to a lesser extent. Thus, although Alternative 2 would not conflict with adopted plans or policies designed to reduce GHGs and would result in a less than significant GHG impact overall, Alternative 2 would be less compatible than the project when viewed in relation to applicable GHG plans and policies.

k. Public Services and Facilities

Impacts to public services and facilities under Alternative 2 would be less than the anticipated impacts associated with the project because the anticipated population under the proposed CPU in 2035 (2,430) is greater than the anticipated population under Alternative 2 in 2035 (1,280). For police and fire protection services, projected population growth (current population is 830) could result in the need for new or expanded services or facilities. While Alternative 2 could result in less demand for new or altered police and fire protection services than the proposed CPU, no construction of such facilities are included in Alternative 2 or the proposed CPU. For schools, under both Alternative 2 and the proposed CPU, future additional housing units suggested in Alternative 2 and the proposed CPU would likely impact district schools. However, the school district would be responsible for potential expansion of development of new facilities. Thus, for Alternative 2, public facilities and services impacts would be less than significant and less than the project.

In the case of both Alternative 2 and the proposed CPU, there would be no deficit in planned population-based parks based on General Plan standards. As with the proposed CPU, implementation of Alternative 2 would provide policy support for increasing the acreage of population-based parks and recreational facilities in the proposed CPU area but does not propose design and construction of new facilities, so no impacts can be identified. As with the proposed CPU, individual park projects under Alternative 2 could require a project-level analysis at the time they are proposed, based on the details of the parks and the existing conditions at the time such projects are pursued. As such, implementation of Alternative 2 would result in a less than significant impact associated with the construction of new facilities.~~As the parks~~

~~deficit would be the same for both Alternative 2 and the project, Alternative 2 and the project would implement the project objective of identifying park and recreation facilities to serve the community to the same degree.~~

I. Public Utilities

Impacts to public utilities under Alternative 2 would be similar to the anticipated impacts of the project. Like the proposed CPU, Alternative 2 contains the proposed CPU policies and land use changes intended to improve compatibility with and implement the General Plan and encourage efficient use and conservation of energy and water resources, implementation of public and private storm water management infrastructure, and solid waste reduction through recycling and composting. Since the anticipated population under Alternative 2 is lower than the anticipated population of the proposed CPU, there would be less construction associated with Alternative 2. As such, implementation of Alternative 1 would result in less solid waste generation compared to the project. As discussed in Section 5.12, Public Utilities, the implementation of the proposed CPU would not result in significant impacts to storm water distribution, sewer, water, communications systems, and solid waste and recycling. It is anticipated that the population in Alternative 2 would be approximately 1,170 fewer people than the proposed CPU. Thus, for Alternative 2, impacts related to storm water, sewer, water distribution, communications systems, and solid waste and recycling would be less than significant and slightly less than the project.

m. Biological Resources

Like the project, Alternative 2 would result in land use changes that would affect primarily developed areas, and therefore, would result in similar impacts to biological resources as those anticipated under the proposed CPU. Implementation of Alternative 2 would also require adherence to all applicable federal, state, and local regulations regarding the protection of biological resources, as for all subsequent development project submittals under the proposed CPU. Therefore, impacts to biological resources under Alternative 2 would be less than significant and similar to those identified for the project.

n. Paleontological Resources

As with the project, future development under Alternative 2 has the potential to result in significant direct and/or indirect impacts to paleontological resources. Implementation of future projects under this alternative would require adherence to all applicable guidelines further described in Section 5.14, Paleontological Resources. The extent of impacts to paleontological resources resulting from implementation of Alternative 2 would be similar to those identified for the proposed CPU, because the extent and areas of disturbance by development would be generally the same and only the land use designation would change. As with the proposed CPU, implementation of Alternative 2 would result in potentially significant impacts related to paleontological resources at the program level, because adherence to the mitigation framework cannot be guaranteed for ministerial projects that only require a grading permit. Thus, impacts to paleontological resources under Alternative 2 would be significant and unavoidable and similar to the project.

8.4 Environmentally Superior Alternative

CEQA Guidelines Section 15126.6(e)(2) requires the identification of an environmentally superior alternative among the alternatives analyzed in an EIR. The guidelines also require that if the No Project Alternative is identified as the environmentally superior alternative, then another environmentally superior alternative must be identified.

Based on a comparison of the alternatives' overall environmental impacts and their compatibility with the proposed CPUs' goals and objectives, Alternative 2 is the environmentally superior alternative for this PEIR. While Alternative 2 would not be able to reduce the significant and unavoidable impacts of the proposed CPU, it would slightly reduce impacts related to traffic circulation due to a lesser amount of ADT. At the same time, Alternative 2 would not achieve consistency with the General Plan's City of Villages strategy to the same extent as the proposed CPU, because it would not provide a balanced land use plan that provides higher residential densities to meet the needs of the future population. Alternative 2 would also achieve consistency with the City's CAP to a lesser degree since the land use plan would not take advantage of higher residential densities located near the Old Town Transit Center to the same extent as the project.

9

Chapter 9.0 References Cited

Chapter 1.0 Introduction

San Diego, City of

- 1987 Old Town San Diego Community Plan, as amended.
- 2005 City of San Diego Environmental Impact Report Guidelines. December. Available at: https://www.sandiego.gov/sites/default/files/legacy/cip/pdf/stadiumeir/2005-12_eir-guidelines-update.pdf, accessed July 18, 2017.
- 2007 Program Environmental Impact Report for the General Plan.
- 2008a City of San Diego General Plan. March.
- 2008b City of San Diego Municipal Code
- 2013 City of San Diego General Plan Housing Element FY2013-FY2020.
- 2014 Old Town San Diego Planned District Ordinance. August.
- 2016 California Environmental Quality Act Significance Determination Thresholds. City of San Diego Planning Department.

Chapter 2.0 Environmental Setting

AECOM

- 2015 Community Plan Update for the Community of Old Town Prehistoric Cultural Resources. January.

Beier, P., and R. F. Noss

- 1998 Do Habitat Corridors Provide Connectivity? *Conservation Biology* 12:1241–1252.

Beier, P., D. R. Majka, and W. D. Spencer

- 2008 Forks in the Road: Choices in Procedures for Designing Wildland Linkages. *Conservation Biology* 22:836–851.

- California Department of Fish and Wildlife (CDFW)
2017 California Natural Diversity Database. Biogeographic Data Branch.
- California Department of Transportation (Caltrans)
2013 Transportation and Construction Vibration Guidance Manual. September.
- California Native Plant Society (CNPS)
2017 Inventory of Rare and Endangered Plants of California (online edition, v8-03 0.39). Available at <http://www.rareplants.cnps.org> [accessed 02 May 2017].
- CalRecycle
2017 Solid Waste Information System. Available at <http://www.calrecycle.ca.gov/SWFacilities/Directory/Search.aspx>.
- Galvin Preservation Associates Inc. (GPA)
2017 City of San Diego Old Town San Diego Community Plan Area Historic Resources Reconnaissance Survey: Historic Context & Reconnaissance Survey. February.
- Holland, R.F.
1986 *Preliminary Descriptions of the Terrestrial Natural Communities of California*. State of California, The Resources Agency.
- Kennedy, M. P., and S.S. Tan
2008 Geology of the San Diego 30'x60' Quadrangle, California, CGS Regional Geologic Map No. 3.
- Lidicker, W. Z., Jr., and J. A. Peterson
1999 Responses of Small Mammals to Habitat Edges. In *Landscape Ecology of Small Mammals*. G. W. Barrett and J. D. Peles, eds. New York: Springer-Verlag.
- Lightner, J.
2011 San Diego County Native Plants (3rd Edition). San Diego Flora, San Diego, California
- Osborne, K. H. (Osborne Biological Consulting) and ICF International.
2014 An Entomological Investigation of the Coronado Beach Naval Base, San Diego County, California. 201. Unpublished report submitted to Coronado Beach Naval Base and Naval Facilities Engineering Command Southwest, San Diego, California.
- Penrod, K., R. Hunter, and M. Merrifield
2001 Missing Linkages: Restoring Connectivity to the California Landscape.
- Project Clean Water
2016 San Diego River Watershed Management Area (WMA). Available at <http://www.projectcleanwater.org/san-diego-river-wma/>.

Regional Water Quality Control Board (RWQCB)

- 2016 Water Quality Control Plan for the San Diego Basin (9). May 17.

Rockwell, T.K., Murbach, M., Murbach, D., Rockwell, K., Haaker, E.

- 2012 Paleoseismic assessment of the late Holocene rupture history of the Rose Canyon fault zone in San Diego: Southern California Edison, San Onofre Nuclear Generating Station, Seismic Source Characterization Research Project.

Rosenberg, D. K., B. R. Noon, and E. C. Meslow

- 1997 Biological Corridors: Form, Function, and Efficacy. *BioScience* 47:677–687.

San Diego, City of

- 1987 Old Town San Diego Community Plan, as amended.
1991 Midway-Pacific Highway Community Plan.
2008a City of San Diego Seismic Safety Study, Geologic Hazards and Faults. Available at: <https://www.sandiego.gov/development-services/industry/hazards>, accessed July 12, 2017.
2008b General Plan. March.
2012 San Diego Municipal Code, Land Development Code, Biology Guidelines. Amended April 23, 2012.
2013 Final Program Environmental Impact Report for the Barrio Logan Community Plan Update; Project No. 240982. May 2.
2015 City of San Diego General Plan, Public Facilities, Services and Safety Element, Updated June 29, 2015.
2016 Final Program Environmental Impact Report for the Uptown Community Plan Update; Project No. 380611. September.
2017 Water Supply Assessment for Old Town San Diego. July.

San Diego, County of

- 2015 SanGIS-SANDAG Regional Data Warehouse. SanGIS and SANDAG authoritative regional GIS data. Available at <http://www.sangis.org/download/index.html>.

SANDAG

- 2014 San Diego Association of Governments Regional GIS Data Warehouse.

Schweiger, E. W., J. E. Diffendorfer, R. D. Holt, R. Pierotti, and M. S. Gaines

- 2000 The Interaction of Habitat Fragmentation, Plant, and Small Mammal Succession in an Old Field. *Ecological Monographs* 70:383–400.

Singleton, D., Rockwell, T.K., Murbach, D., Murbach, M., Maloney, J., Marquez, E., Weidman, L., Levy, Y., Rugg, S.

- 2017 Timing of late Holocene earthquakes on the Rose Canyon fault at Old Town, San Diego, CA: Geological Society of America Abstracts with Programs, v. 49, no. 4, doi: 10.1130/abs/2017CD-292564

Unitt, Phillip

- 2004 San Diego County Bird Atlas. San Diego Natural History Museum & Ibis Publishing Company, San Diego. 645 pp.

Western Bat Working Group (WBWG)

- 2017 Western Bat Species. Website <http://wbwg.org/western-bat-species/> [accessed 02 May 2017].

Wilson Geosciences, Inc.

- 2012 Seismic and Geologic Technical Background Report for the City of San Diego Midway-Pacific Highway and Old Town Community Plan Updates, and Environmental Impact Report, City of San Diego, San Diego County, California. April.

Chapter 3.0 Project Description

San Diego, City of

- 2017 Draft Old Town San Diego Community Plan Update. July.

Chapter 4.0 Regulatory Framework

California Air Resources Board (CARB)

- 2000 Risk Reduction Plan to Reduce Particulate Matter Emissions from Diesel-fueled Engines and Vehicles. Available at: <https://www.arb.ca.gov/diesel/documents/rrpFinal.pdf>, accessed July 12, 2017.
- 2014 First Update to the Climate Change Scoping Plan. Building on the Framework Pursuant to AB 32 – The California Global Warming Solutions Act of 2006. May 2014.
- 2015 California Air Quality Data Statistics. California Air Resources Board Internet Site. <http://www.arb.ca.gov/adam/welcome.html>. Accessed July 12, 2017.
- 2017b Area Designation Maps/State and National. Available at <http://www.arb.ca.gov/desig/desig.htm>. Accessed June 2017.

San Diego, City of

- 1998 Land Development Code - Historical Resources Regulations
- 2000 Land Development Manual - Historical Resources Guidelines and Associated Appendices (2009-2012)
- ~~2018~~ Land Development Manual - Biological Resources Guidelines
- 2018 Land Development Manual – Storm Water Standards Manual
- ~~2018~~ Land Development Code – Environmentally Sensitive Lands Regulation
- 2013 City of San Diego Bicycle Master Plan. Prepared by Alta Planning and Design. December.
- 2015 City of San Diego General Plan Amendments. Adopted by City Council June 29, 2015.
- 2016 City of San Diego Recycling Ordinance. <https://www.sandiego.gov/environmental-services/recycling/ro>. Accessed on July 12, 2017.

San Diego, County of

- 1992 1991/1992 Regional Air Quality Strategies. Air Pollution Control District. June.

- 2016 San Diego County Hazardous Materials Division. <http://www.sandiegocounty.gov/content/sdc/deh/hazmat.html>. Accessed on July 12, 2017.

San Diego County Regional Airport Authority (SDCRAA)

- 2014 San Diego International Airport Land Use Compatibility Plan. Prepared by Ricondo & Associates, Inc. Adopted April 3, 2014.

United States Environmental Protection Agency (USEPA)

- 2010 Regulatory Announcement "EPA and NHTSA Finalize Historic National Program to Reduce Greenhouse Gases and Improve Fuel Economy for Cars and Trucks" April.
- 2012 Regulatory Announcement "EPA and NHTSA Set Standards to Reduce Greenhouse Gases and Improve Fuel Economy for Model Years 2017-2025 Cars and Light Trucks. August.

Chapter 5.0 Environmental Analysis

5.1 Land Use

San Diego, City of

- 2008 General Plan. March.

San Diego County Regional Airport Authority.

- 2014 San Diego International Airport Airport Land Use Compatibility Plan. April 3. Available at: [http://www.san.org/Portals/0/Documents/Land%20Use%20Compatibility/SDIA/SDIA%20ALUCP%20Ch%201-6%20\(May%202014\).pdf](http://www.san.org/Portals/0/Documents/Land%20Use%20Compatibility/SDIA/SDIA%20ALUCP%20Ch%201-6%20(May%202014).pdf). Accessed March 29, 2017.

5.2 Transportation and Circulation

Chen Ryan Associates, Inc.

- 2017 Midway-Pacific Highway & Old Town Mobility Element Updates: Transportation Impact Study. December 2017.

San Diego, City of

- 1998 Traffic Impact Study Manual. July
- 2016 California Environmental Quality Act Significance Determination Thresholds. Planning Department.

State of California

- 1992 Department of Transportation. Travel Forecasting Guidelines. November.

5.3 Historical and Tribal Cultural Resources

AECOM

- 2015 Community Plan Update for the Community of Old Town – Prehistoric Cultural Resources, City of San Diego, California. January.

Galvin Preservation Associates Inc.

- 2017 City of San Diego Draft Old Town Community Plan Area Historic Resources Survey Report: Historic Context & Reconnaissance Survey. February.

San Diego, City of

- 2000 San Diego Municipal Code, Land Development Manual, Historical Resources Guidelines and Associated Appendices (2009-2012)
- 2016 California Environmental Quality Act Significance Determination Thresholds. Planning Department, July.

5.4 Geologic Conditions

San Diego, City of

- 2016 California Environmental Quality Act Significance Determination Thresholds. Planning Department.
- 2008 San Diego Seismic Safety Study, Geologic Hazards and Faults Maps. Available online at: <https://www.sandiego.gov/development-services/industry/hazards>. Accessed on March 3, 2017.

Wilson Geosciences, Inc.

- 2011 Seismic and Geologic Technical Background Report for the City of San Diego Midway-Pacific Highway and Old Town Community Plan Updates, and Environmental Impact Report, City of San Diego, San Diego County, California. May.

5.5 Noise

AECOM

- 2017 Noise Technical Report for the Midway-Pacific Highway and Old Town Community Plan Updates, July 2017.

California Department of Transportation (Caltrans)

- 2013 Transportation and Construction Vibration Guidance Manual. Division of Environmental Analysis. September 2013.

Chen Ryan Associates, Inc.

- 2017 Midway-Pacific Highway & Old Town Mobility Element Updates: Transportation Impact Study. December 2017.

Federal Transit Administration (FTA)

- 2006 Transit Noise and Vibration Impact Assessment FTA-VA-90-1003-06. Office of Planning and Environment. May 2006.

RECON

- 2016 Noise Analysis for the Uptown, North Park, and Golden Hill Community Plan Updates. May 24, 2016.

San Diego Association of Governments (SANDAG)

- 2014 Mid-Coast Corridor Transit Project Noise and Vibration Impacts Technical Report. August 2014.

San Diego, City of

- 2016 California Environmental Quality Act Significance Determination Thresholds. Planning Department.
- 2012 San Diego Municipal Code, Noise Abatement and Control.

San Diego County Regional Airport Authority

- 2014 San Diego International Airport Land Use Compatibility Plan. Prepared by Ricondo & Associates, Inc. Adopted April 3, 2014.

San Diego Regional Traffic Standards Task Force

- 2000 SANTEC/ITE Guidelines for Traffic Impact Studies in the San Diego Region. March.

5.6 Health and Safety

Ninyo & Moore

- 2012 Hazardous Materials Technical Study, Midway and Old Town Community Plan Updates, San Diego, California. April.

San Diego, City of

- 2008 General Plan Program Environmental Impact Report. Available at <https://www.sandiego.gov/planning/genplan/documents/peir>. Accessed on March 14, 2017.
- 2009 Fire-Rescue Department. Very High Fire Hazard Severity Zone Map. Available online at: <https://www.sandiego.gov/fire/services/brush/severityzones>. Accessed on March 13, 2017.

San Diego, County of

- 2014 Unified San Diego County Emergency Services Organization and County of San Diego Operational Area Emergency Operations Plan (Annex Q – Evacuation). September.
- 2017 San Diego County Hazardous Materials Division. Available at: <http://www.sandiego-county.gov/content/sdc/deh/hazmat.html>. Accessed on March 14, 2017.

State of California

- 2017 State Water Resources Control Board. GeoTracker. Available online at: <https://geotracker.waterboards.ca.gov/map/>. Accessed on March 15, 2017.

5.7 Hydrology/Water QualitySan Diego Regional Water Quality Control Board.

- 1994 ~~San Diego Regional Water Quality Control Board.~~ San Diego Region – The Basin Plan. Available at: http://www.waterboards.ca.gov/sandiego/water_issues/programs/basin_plan/. Accessed on April 13, 2017.

Project Clean Water

- 2017 Project Clean Water. Available at: <http://www.projectcleanwater.org/>. Accessed on April 14, 2017.

City of San Diego

- 2018 Land Development Manual – Storm Water Standards Manual. Available at: <https://www.sandiego.gov/planning/programs/landdevcode/landdevmanual>. Accessed on July 10, 2018.

5.9 Air Quality

Bay Area Air Quality Management District (BAAQMD)

- 2017 CEQA Air Quality Guidelines. Available at http://www.baaqmd.gov/~media/files/planning-and-research/ceqa/ceqa_guidelines_may2017-pdf.pdf?la=en. Accessed June 2017.

California Air Pollution Control Officers Association (CAPCOA)

- 2016 California Emissions Estimator Model (CalEEMod) Version 2016.3.1. Available at <http://caleemod.com/>. Accessed June 2017.

California Air Resources Board (CARB)

- 2005 Air Quality and Land Use Handbook: A Community Health Perspective. Available at <http://www.arb.ca.gov/ch/landuse.htm>. Accessed June 2017.
- 2016 Ambient Air Quality Standards. Available at <http://www.arb.ca.gov/research/aaqs/caaqs/caaqs.htm>. Accessed June 2017.
- 2017 Air Quality Data Statistics. Available at <http://www.arb.ca.gov/adam/welcome.html>. Accessed June 2017.
- 2017b Area Designation Maps/State and National. Available at <http://www.arb.ca.gov/desig/desig.htm>. Accessed June 2017.

Chen Ryan Associates, Inc.

- 2017 Transportation Impact Study. Midway-Pacific Highway & Old Town Mobility Element Updates. December 2017.

City of San Diego

- 2016 California Environmental Quality Act. Significance Determination Thresholds. Available at https://www.sandiego.gov/sites/default/files/july_2016_ceqa_thresholds_final_0.pdf. Accessed June 2017.

Office of Environmental Health Hazard Assessment (OEHHA)

- 2015 Hot Spots Guidance Manual. Available at http://www.oehha.org/air/hot_spots/hotspots2015.html. Accessed March 2015.

Sacramento Metropolitan Air Quality Management District (SMAQMD)

- 2016 CEQA Guide to Air Quality Assessment: Program-Level Analysis of General Plans and Area Plans. Accessed June 2017.

San Diego County Air Pollution Control District (SDAPCD)

- 2016 Regional Air Quality Strategy Revision. Available at <http://www.sandiegocounty.gov/content/dam/sdc/apcd/PDF/Air%20Quality%20Planning/2016%20RAQS.pdf>. Accessed June 2017.
- 1998 Rule 20.2. New Source Review. Available at http://www.sandiegocounty.gov/content/dam/sdc/apcd/PDF/Rules_and_Regulations/Permits/APCD_R20-2.pdf. Accessed June 2017.

United States Environmental Protection Agency (EPA)

- 2007 Six Common Pollutants, Particulate Matter. Available at <https://www.epa.gov/criteria-air-pollutants>. Accessed June 2017.

Western Regional Climate Center (WRCC).

- 2017 Available: <https://wrcc.dri.edu/Climate/summaries.php>. Accessed June 2017.

5.10 Greenhouse Gas Emissions**California Air Pollution Control Officers Association (CAPCOA)**

- 2016 California Emissions Estimator Model (CalEEMod) Version 2016.3.1. Appendix E Technical Source Documentation. Available at <http://caleemod.com/>. Accessed June 2017.

California Air Resources Board (CARB)

- 2008 Local Government Operations Protocol: Chapter 10 – Wastewater Treatment Facilities and EPA’s Inventory of US Greenhouse Gas Emissions and Sinks Available at https://www.arb.ca.gov/cc/protocols/localgov/archive/final_lgo_protocol_2008-09-25.pdf. Accessed June 2017.

Chen Ryan Associates, Inc.

- 2017 Midway-Pacific Highway & Old Town Mobility Element Updates: Transportation Impact Study. December.

City of San Diego

- 2016 Climate Action Plan. Available at https://www.sandiego.gov/sites/default/files/final_july_2016_cap.pdf. Accessed June 2017.

Intergovernmental Panel on Climate Change (IPCC)

- 2007 Climate Change 2007: The Physical Science Basis. Contribution of Working Group I to the Fourth Assessment Report of the IPCC. Geneva, Switzerland. February.

University of San Diego

- 2014 GHG Emissions Inventory for the San Diego Region. Energy Policy Initiatives Center (EPIC) at University of San Diego. April.

5.11 Public Services and Facilities

Citygate

- 2011 Fire Service Standards of Response Coverage Deployment Study for the City of San Diego Fire Rescue Department. February 14.

La Playa Trail Association

- 2013 La Playa Trail. Available at: <http://www.laplayatrail.org/about.html>. Accessed on April 18, 2017.

San Diego, City of

- 2015 City of San Diego General Plan, Public Facilities, Services and Safety Element, Updated June 29, 2015.
- 2016 California Environmental Quality Act Significance Determination Thresholds. Public Services and Facilities. Planning Department.

5.12 Public Utilities

California Public Utilities Commission (CPUC)

- 2012 Renewables Portfolio Standard Quarterly Report, 1st and 2nd Quarter.
- 2016 Biennial RPS Program Update: In Compliance with Public Utilities Code Section 913.6. January.

San Diego, City of

- 2008a General Plan. March.
- 2017a Water Supply Assessment for Old Town San Diego. July.
- 2017b Environmental Services, Miramar Landfill. Available online at: <https://www.sandiego.gov/environmental-services/miramar>. Accessed on May 8, 2017.

5.13 Biological Resources

Beier, P., and R. F. Noss

- 1998 Do Habitat Corridors Provide Connectivity? *Conservation Biology* 12:1241–1252.

Beier, P., D. R. Majka, and W. D. Spencer

- 2008 Forks in the Road: Choices in Procedures for Designing Wildland Linkages. *Conservation Biology* 22:836–851.

California Department of Fish and Wildlife (CDFW)

- 2017 California Natural Diversity Database. Biogeographic Data Branch.

California Native Plant Society, Rare Plant Program

- 2017 Inventory of Rare and Endangered Plants of California (online edition, v8-03 0.39). Website <http://www.rareplants.cnps.org> [accessed 02 May 2017].

-
- Crooks, K. R., and M. Sanjayan
2006 Evolution and Systematics 37: 317–342. Connectivity Conservation (1st ed.). Cambridge University Press.
- Holland, Robert F., Ph.D.
1986 Preliminary Descriptions of the Terrestrial Natural Communities of California. Prepared for California Department of Fish and Wildlife.
1986 Natural Communities of California”, October.
- Lidicker, W. Z., Jr., and J. A. Peterson
1999 Responses of Small Mammals to Habitat Edges. In Landscape Ecology of Small Mammals. G. W. Barrett and J. D. Peles, eds. New York: Springer-Verlag.
- Lightner, J.
2011 San Diego County Native Plants. San Diego Flora, San Diego, California.
- Oberbauer, Thomas, Meghan Kelly, and Jeremy Buegge
2008 Draft Vegetation Communities of San Diego County. Based on “Preliminary Descriptions of the Terrestrial. March.
- Osborne, K. H. (Osborne Biological Consulting) and ICF International
2014 An Entomological Investigation of the Coronado Beach Naval Base, San Diego County, California. 201. Unpublished report submitted to Coronado Beach Naval Base and Naval Facilities Engineering Command Southwest, San Diego, California.
- Penrod, K., R. Hunter, and M. Merrifield
2001 Missing Linkages: Restoring Connectivity to the California Landscape.
- Rosenberg, D. K., B. R. Noon, and E. C. Meslow
1997 Biological Corridors: Form, Function, and Efficacy. *BioScience* 47:677–687.
- San Diego, City of
2016 California Environmental Quality Act Significance Determination Thresholds. Prepared by the Planning Department, Land Development Review Division. July.
2012 San Diego Municipal Code, Land Development Code, Biology Guidelines. Amended April 23, 2012.
2013 San Diego River Park Master Plan. https://www.sandiego.gov/sites/default/files/sdrp_master_plan_full.pdf
- San Diego, County of
1998 Final Multiple Species Conservation Program.
2015 SanGIS-SANDAG Regional Data Warehouse. SanGIS and SANDAG authoritative regional GIS data. Available at <http://www.sangis.org/download/index.html>
-

- Schweiger, E. W., J. E. Diffendorfer, R. D. Holt, R. Pierotti, and M. S. Gaines
2000 The Interaction of Habitat Fragmentation, Plant, and Small Mammal Succession in an Old Field. *Ecological Monographs* 70:383–400.
- Unitt, Phillip
2004 San Diego County Bird Atlas. San Diego Natural History Museum & Ibis Publishing Company, San Diego. 645 pp.
- Western Bat Working Group (WBWG)
2017 Western Bat Species. Website <http://wbwg.org/western-bat-species/> [accessed 02 May 2017].

5.14 Paleontological Resources

- Deméré, T., and S. Donohue
2013 Paleontological Resource Assessment, Old Town San Diego and Midway-Pacific Highway Corridor Community Plan Updates, City of San Diego, San Diego County, California. October.
- Deméré, T., and S. Walsh
1994 Paleontological Resources- County of San Diego. August. http://www.sandag.org/uploads/projectid/projectid_503_19239.pdf.
- San Diego, City of
2002 Paleontology Guidelines. July.

Chapter 6.0 Cumulative Impacts

- San Diego Association of Governments (SANDAG)
2013 Series 13 Regional Growth Forecast. October. Available at: http://www.sandag.org/uploads/projectid/projectid_503_19239.pdf, accessed July 18, 2017.

Chapter 7.0 Other Mandatory Discussion Area

- California Department of Conservation, Division of Mines and Geology (CDC)
1996 Open File Report 96-04. Update of Mineral Land Classification: Aggregate Materials in the Western San Diego County Production-Consumption Region, Russell V. Miller. <http://maps.conservation.ca.gov/cgs/informationwarehouse/index.html?map=mlc>. Accessed on April 10, 2017.
- 2016 San Diego County Important Farmland 2014. Farmland Mapping and Monitoring Program. <http://www.conservation.ca.gov/dlrp/fmmp/Pages/SanDiego.aspx>. Accessed on April 7, 2017.
- California Natural Resources Agency
2009 California Environmental Quality Act, Appendix F – Energy Conservation. Revised 2009.

Chen Ryan Associates, Inc.

- 2017 Midway-Pacific Highway & Old Town Mobility Element Updates: Transportation Impact Study. December.

United States Department of Agriculture (USDA)

- 2017 Forest Service – Standard Map Products. <https://data.fs.usda.gov/geodata/maps/standard-map.php>. Accessed on April 7, 2017.

Chapter 8.0 Alternatives

Chen Ryan Associates, Inc.

- 2017a Midway-Pacific Highway & Old Town Mobility Element Updates: Transportation Impact Study. December.
- 2017b Midway-Pacific Highway & Old Town Communities Mobility Report. March.

San Diego, City of

- 1987 Old Town San Diego Community Plan, as amended.
- 2017 Draft Old Town San Diego Community Plan Update. July.

This page intentionally left blank.



Chapter 10.0 Individuals and Agencies Consulted

City of San Diego, Public Utilities Department

- Shelby Gilmartin, Assistant Engineer-Civil

San Diego Police Department

- Paul Connelly, Captain, Western Division

San Diego Unified School District, Instructional Facilities Planning Department

- Sarah Hudson, Demographer

This page intentionally left blank.



Chapter 11.0 Certification

This PEIR has been completed by the City of San Diego's Planning Department and is based on independent analysis and determinations made pursuant to SDMC Section 128.0103. The following individuals contributed to the fieldwork and/or preparation of this report.

City of San Diego

Planning Department

- Alyssa Muto, Deputy Director, Environment and Policy Analysis Division
- Laura Black, AICP, Deputy Director, Long-Range Planning Division
- Tait Galloway, Program Manager
- Vickie White, Senior Planner
- Elizabeth Ocampo-Vivero, Senior Planner
- Myra Herrmann, Senior Environmental Planner
- Samir Hajjiri, PE, DCE, Senior Traffic Engineer
- Susan Morrison, AICP, Associate Environmental Planner
- Christine Mercado, Associate Traffic Engineer
- Meghan Cedeno, PE, Traffic Engineer
- Rebecca Malone, AICP, Senior Environmental Planner
- Alexander Frost, Senior Planner
- Kelley Stanco, Senior Historic Resources Planner
- Craig Hooker, Park Designer
- Robin Shifflet, Program Manager
- Holly Smit-Kicklighter, MSCP Planner
- Benjamin Hafertepe, Associate Management Analyst, Facilities Financing
- Angela Abeyta, Supervising Management Analyst, Facilities Financing

Development Services Department

- Jim Quinn, Senior Engineering Geologist, Geology
- Louis Schultz, Senior Engineer-Civil, Engineering
- Bill Prinz, Program Manager, Local Enforcement Agency
- Mehdi Rastakhiz, Associate Engineer-Civil, Public Utilities

Environmental Services Department

- Lisa Wood, Senior Planner

Transportation and Storm Water Department

- Mark G. Stephens, AICP, Associate Planner

Police Department

- James Keck, Police Lieutenant

San Diego Fire-Rescue Department

- Larry Trame, Assistant Fire Marshal

PEIR Preparers

AECOM

- Yara Fisher, Principal Planner
- Bill Graham, Principal Planner
- Erin Murphey, Environmental Analyst
- Meghan Haggblade, Environmental Analyst
- Sheila Madrak, Biologist
- Peter Augello, GIS
- Dan Brady, Graphics

Technical Appendices Preparers

Transportation Impact Study & Mobility Report – Chen Ryan

- Stephen C. Cook, PE, Principal
- Phuong H. Nguyen, Engineer
- Rona B. Quiambao, Engineer
- Andrew Prescott, Transportation Planner
- Aleksandar Jovanovic, GIS/Graphics
- Timmy Quach, Intern

Historic Resources Reconnaissance Survey: Historic Context & Survey Report – Galvin Preservation Associates Inc.

- Teresa Grimes, Principal Architectural Historian
- Nicole Collum, Architectural Historian
- Jennifer Krintz, Architectural Historian
- Elysha Dory, Architectural Historian

Prehistoric Cultural Resources Report – AECOM

- Rebecca Apple, MA, RPA
- Stacey Jordan-Connor, Ph.D., RPA
- Cheryl Bowden-Renna, Archaeologist
- Stephanie Jow, Archaeologist
- Andrew York, RPA

Seismic and Geologic Technical Background Report – Wilson Geosciences, Inc.

- Kenneth Wilson, Principal Geologist

Update of Seismic and Geologic Technical Background Report – AECOM

- Michael E. Hatch, Principal Engineering Geologist
- Kelly Giesing, Geotechnical Engineer

Noise Report – AECOM

- Mark Storm, INCE Bd. Cert., Principal Engineer, Acoustics and Noise Control
- Chris Kaiser, INCE, Senior Environmental Noise Specialist

Air Quality and Greenhouse Gas Technical Reports – AECOM

- Jason Paukovits, Senior Air Quality Specialist
- Paola Pena, Air Quality Specialist

Hazardous Materials Technical Study – Ninyo & Moore

- Adrian Olivares, Senior Staff Environmental Scientist
- Stephan A. Beck, Manager, Environmental Sciences Division

Paleontological Resource Assessment – Department of PaleoServices, San Diego Natural History Museum

- Shelly L. Donohue, M.S. Paleontological Report Writer
- Thomas A. Deméré, Ph.D., Director

This page intentionally left blank.