

FINAL PROGRAM ENVIRONMENTAL IMPACT REPORT

Project No. 607857
SCH No. 2018111024

SUBJECT: KEARNY MESA COMMUNITY PLAN UPDATE

Applicant: City of San Diego Planning Department

FINAL DOCUMENT – July 8, 2020:

In response to comments received during public review, minor revisions and clarifications have been made to the document which do not change the conclusions of the Draft Program Environmental Impact Report (PEIR) regarding the project's potential environmental impacts and required mitigation. As defined in CEQA Guidelines Section 15088.5, minor revisions and clarifications to the document – which are shown in ~~strikeout~~/underline format in Chapter 3, Revisions to the Draft PEIR in the Final PEIR – 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 Kearny Mesa Community Plan and associated discretionary actions (collectively referred to as the “project”) entails a comprehensive update to the Kearny Mesa Community Plan, which is intended to guide future development of the Kearny Mesa Community Plan area (Community Plan area). It articulates an overall vision, designates land uses, and provides a comprehensive set of policies for new development within the Kearny Mesa Community Plan area. The proposed project incorporates relevant policies from the City of San Diego General Plan (General Plan), and provides a long-range, comprehensive policy framework and vision for growth and development in Kearny Mesa. The proposed project provides community-specific policies that further implement the General Plan with respect to the distribution and arrangement of land uses and the local street and transit network; urban design guidelines; recommendations to preserve natural open space and historic and cultural resources; and provision of public services to the Community Plan area. The proposed project maintains employment areas and identifies village areas. The proposed project also enhances community connections with a comprehensive network of complete streets and urban pathways.

In addition to adoption of the Community Plan, the project includes: amendments to the General Plan to incorporate the Community Plan land uses; amendments to the Land Development Code; and a comprehensive rezone. The actions together with the proposed Community Plan Update form the project for this PEIR. Discretionary actions by other agencies include a recommendation from the San Diego County Regional Airport Authority.

The following link includes additional information on the Kearny Mesa Community Plan Update: <https://www.sandiego.gov/planning/community/cpu/kearnymesa>

PROJECT LOCATION:

The Kearny Mesa Community Plan area (Community Plan area) is located in the central portion of the City of San Diego. The Community Plan area encompasses approximately 4,423 acres and is bounded by State Route (SR) 52 on the north, Interstate (I-) 805 on the west, and I-15 on the east. The Community Plan area is bounded by properties south of Aero Drive and those extending to Friars Road along the western edge of I-15 on the south. Marine Corps Air Station (MCAS) Miramar is located to the north of the Community Plan area, the community of Tierrasanta is to the east, the communities of Serra Mesa and Mission Valley are to the south, the community of Clairemont Mesa is located to the west, and a small portion of the community of Linda Vista is adjacent to the southwest.

The Community Plan area is predominantly urbanized and largely developed with industrial, commercial, and office uses due its role as a major employment center. Other uses include residential, institutional, educational, recreation, open space, Montgomery-Gibbs Executive Airport, transportation facilities/utilities, and vacant land. Development is concentrated on the relatively flat mesa top that characterizes most of the landform within the Community Plan area. Two major canyons traverse the community, including Murphy Canyon that parallels I-15 along the eastern Community Plan area boundary and a tributary canyon of the San Clemente Canyon that extends into the northwest portion of the Community Plan area between the I-805 and SR 52.

ENVIRONMENTAL DETERMINATION:

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

Based on the analysis conducted for the project described above, the City of San Diego has prepared the following Draft PEIR in accordance with CEQA. The analysis conducted identified that the proposed project could result in significant and unavoidable impacts in the areas of **Air Quality (Conflicts with Air Quality Plans; Air Quality Standards; and Sensitive Receptors); Historical, Archaeological, and Tribal Cultural Resources (Historic Buildings, Structures, Objects, or Sites; Prehistoric and Historic Archaeological Resources, Sacred Sites, and Human Remains; and Tribal Cultural Resources); Noise (Ambient Noise; Noise – Land Use Compatibility; Airport Noise; Construction Noise; and Vibration); Public Services and Facilities (Public Facilities; Deterioration of Existing Neighborhood Parks and Recreational Facilities; Construction or Expansion of Recreational Facilities); Public Utilities (Utilities); Transportation (Vehicle Miles Traveled); and Visual Effects and Neighborhood Character (Neighborhood Character)**. All other impacts analyzed in this Draft PEIR were found to be less than or not significant.

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

RESULTS OF PUBLIC REVIEW:

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



Alyssa Muto, Deputy Director
Planning Department

March 17, 2020
Date of Draft Report

July 8, 2020
Date of Final Report

Analyst: Rebecca Malone, AICP, Planning Department

PUBLIC REVIEW DISTRIBUTION:

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

FEDERAL GOVERNMENT

MCAS Miramar (13)
Environmental Protection Agency (19)
US Fish and Wildlife Service, Pat Gower (23)
US Army Corps of Engineers Los Angeles District, Shelly Lynch (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)
Housing and Community Development (38)
Department of Toxic Substance Control (39)
Natural Resources Agency (43)
Regional Water Quality Control Board, Region 9 (44)
State Clearinghouse (46A)
California Air Resources Board (49)
California Transportation Commission (51)
California Department of Transportation (51A)
Native American Heritage Commission (56)

COUNTY OF SAN DIEGO

Air Pollution Control District (65)
Department of Planning and Development Services (68)
Department of Public Works (70)
County Water Authority (73)
Department of Environmental Health (75-IOM)
Land & Water Quality Division (76-IOM)

CITY OF SAN DIEGO

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

City Attorney's Office

Corrine Neuffer, Deputy City Attorney

Noah Brazier, Deputy City Attorney

Planning Department

Mike Hansen, Director

Tom Tomlinson, Assistant Director

Alyssa Muto, Deputy Director

Laura Black, Deputy Director

Brian Schoenfisch, Program Manager

Heidi Vonblum, Program Manager

Lisa Lind, AICP, Senior Planner

Rebecca Malone, AICP, Senior Planner

Elena Pascual, Associate Planner

Jordan Moore, Associate Planner

Alberto Santos-Davidson, Associate Planner

Tara Ash-Reynolds, Junior Planner

Elizabeth Dickson, Assistant Planner

Samir Hajjiri, Senior Traffic Engineer

Christine Mercado, Associate Traffic Engineer

Kristy Forburger, Senior Planner – MCSP

Kelley Stanco, DPMIII – Historic Resources

Angela Abeyta, Facilities Financing

Environmental Services Department

Lisa Wood, Program Manager

Development Services Department

Elyse Lowe, Director

Gary Geiler, Deputy Director

Anna McPherson, Program Manager

Jim Quinn, Senior Engineering Geologist

Bill Prinz, Program Manager, Local Enforcement Agency

Public Utilities Department

Keli Balo, Project Officer II

Nicole McGinnis, Senior Planner

Fire-Rescue Department

Larry Trame, Assistant Fire Marshal

Police Department

Tristan Schmottlach, Sergeant

Transportation & Storm Water Department

Kris McFadden, Director

Andrew Kleis, Deputy Director

Duncan Hughes, Deputy Director

Ruth Kolb, Program Manager

Mark G. Stephens, Associate Planner

Real Estate Assets Department
Cybele Thompson, Director

Sustainability Department
Cody Hooven, Director

City Government
San Diego Housing Commission (88-IOM)

City Advisory Boards or Committees
Park and Recreation Board (83)
Community Forest Advisory Board (90, Melissa Garcia)
Historical Resources Board (87, Kelley Stanco)

Libraries
Central Library, Government Documents (81 & 81A)
Balboa Branch Library (81B)
Serra Mesa Branch Library (81GG)
University Community Branch Library (81JJ)

OTHER AGENCIES

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

SCHOOL DISTRICTS

San Diego Unified School District, Tony Raso (125)
San Diego Unified School District, Sarah Hudson (132A)
San Diego Community College District (133)

COMMUNITY PLANNING GROUPS

Kearny Mesa Planning Group (265)
Serra Mesa Planning Group (263A)

COMMUNITY COUNCILS

Serra Mesa Community Council (264)

HISTORICAL, ARCHAEOLOGICAL, AND TRIBAL GROUPS

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)
Native American Heritage Commission (222)
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)

OTHER INTERESTED AGENCIES, ORGANIZATIONS, AND INDIVIDUALS

Daily Transcript

San Diego Chamber of Commerce (157)

Building Industry Association (158)

San Diego River Park Foundation (163)

San Diego River Coalition (164)

Sierra Club San Diego Chapter (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)

Mary Johnson (263B)

July 2020 | Final Program Environmental Impact Report
State Clearinghouse No. 2018111024
Project No. 607857

Kearny Mesa Community Plan Update

for the City of San Diego

Prepared for:

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

**KEARNY MESA COMMUNITY PLAN UPDATE
FINAL PROGRAM ENVIRONMENTAL IMPACT REPORT**

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1.0 Introduction

This Final Program Environmental Impact Report (PEIR) has been prepared in accordance with the California Environmental Quality Act (CEQA) as amended (Public Resources Code [PRC] Section 21000 et seq.) and the CEQA Guidelines (California Code of Regulations [CCR] Section 15000 et seq.). Together with the circulated Draft PEIR (Project No. 607857/State Clearinghouse No. 2018111024), published March 17, 2020, this document constitutes the Final PEIR for the proposed Kearny Mesa Community Plan Update (CPU) and associated discretionary actions (collectively referred to as the “project”). This Final PEIR contains responses to comments received on the Draft PEIR during the public review period, which began March 17, 2020, and closed May 1, 2020, as well as revisions to the Draft PEIR. The primary purpose of the Final PEIR is to revise and refine the environmental analysis in the Draft PEIR in response to comments received during the public review period.

This document represents the independent judgment of the Lead Agency. The City of San Diego is the Lead Agency responsible for ensuring that the proposed CPU complies with CEQA. “Lead Agency” is defined by CEQA Section 21067 as “the public agency which has the principal responsibility for carrying out or approving a project which may have a significant effect upon the environment.”

1.1 CEQA Requirements

1.1.1 Certification of the Final PEIR

Before the City may approve the various discretionary actions needed to implement the proposed CPU, it must independently review and consider the information contained in the Final PEIR, certifying that the Final PEIR adequately discloses the environmental effects of the proposed CPU, that the Final PEIR has been completed in conformance with CEQA, and that the decision-making body of the Lead Agency independently reviewed and considered the information contained in the Final PEIR. Certification of the Final PEIR would indicate the City’s determination that the Final PEIR adequately evaluates the environmental impacts that could be associated with the proposed CPU.

For impacts identified in the PEIR that cannot be reduced to a level that is less than significant, the City must make findings and prepare a Statement of Overriding Considerations for approval of the proposed CPU if specific social, economic, or other factors justify the proposed CPU’s unavoidable adverse environmental effects. If the City decides to approve the proposed CPU for which the Final PEIR has been prepared, it will issue a Notice of Determination.

The City of San Diego has prepared this document pursuant to CEQA Guidelines Section 15132, which specifies that the Final PEIR shall consist of:

- The Draft PEIR or a revision of the Draft;
- A list of persons, organizations, and public agencies commenting on the Draft PEIR;
- Comments and recommendations received on the Draft PEIR;
- The response of the Lead Agency to significant environmental points raised in the review process; and
- Any other information added by the Lead Agency.

This Final PEIR incorporates comments from public agencies and the general public. It also contains the Lead Agency's responses to those comments. Copies of the Final PEIR have been provided to agencies and other parties that commented on the Draft PEIR or have requested the Final PEIR. The Final PEIR can also be accessed through the City of San Diego website: <https://www.sandiego.gov/ceqa>.

1.1.2 New Information in the Final PEIR

If significant new information is added to an EIR after notice of public review has been given, but before final certification of the EIR, the Lead Agency must issue a new notice and recirculate the EIR for further comments and consultation. Significant new information is that which discloses that:

- A new significant environmental impact would result from the project or from a new mitigation measure proposed to be implemented;
- A substantial increase in the severity of an environmental impact would result unless mitigation measures are adopted that reduce the impact to a level of insignificance;
- A feasible project alternative or mitigation measure considerably different from others previously analyzed would clearly lessen the significant environmental impacts of the project, but the project's proponents decline to adopt it; or
- The Draft EIR was so fundamentally and basically inadequate and conclusory in nature that meaningful public review and comment were precluded.

Corrections or clarifications to the Draft PEIR identified in this document do not constitute significant new information pursuant to CEQA Guidelines Section 15088.5; this new information merely clarifies and makes insignificant changes to an adequate PEIR. Information presented in the Draft PEIR and this document support this determination.

1.1.3 Comments and Responses

CEQA Guidelines Section 15204(a) outlines parameters for submitting comments, and reminds persons and public agencies that the focus of review and comment of Draft PEIRs should be "on the sufficiency of the document in identifying and analyzing possible impacts on the environment and ways in which significant effects of the project might be avoided or mitigated. Comments are most helpful when they suggest additional specific alternatives or mitigation measures that would provide better ways to avoid or mitigate the significant environmental effects. At the same time, reviewers should be aware that the adequacy of an EIR is determined in terms of what is reasonably feasible. ...CEQA does not require a lead agency to conduct every test or perform all research, study, and experimentation recommended or demanded by commenters. When responding to comments, lead agencies need only respond to significant environmental issues and do not need to provide all information requested by reviewers, as long as a good faith effort at full disclosure is made in the EIR."

CEQA Guidelines Section 15204(c) further advises, "Reviewers should explain the basis for their comments, and should submit data or references offering facts, reasonable assumptions based on facts, or expert opinion supported by facts in support of the comments. Pursuant to CEQA Guidelines Section 15064, an effect shall not be considered significant in the absence of substantial evidence." CEQA Guidelines Section 15204(d) also states, "Each responsible agency and trustee agency shall focus its comments on environmental information germane to that agency's statutory responsibility." CEQA Guidelines Section 15204(e) states, "This section shall not be used to restrict the ability of reviewers to comment on the

general adequacy of a document or of the lead agency to reject comments not focused as recommended by this section.”

In accordance with CEQA (PRC Section 21092.5), copies of the written responses to public agencies will be forwarded to those agencies at least 10 days prior to certifying the environmental impact report. The responses will be forwarded with copies of this Final PEIR, as permitted by CEQA, and will conform to the legal standards established for response to comments on Draft PEIRs.

1.2 Format of the Final PEIR

Due to minimal changes to the Draft PEIR, the City of San Diego has prepared an errata to the Draft PEIR which summarizes the revisions that were made in response to comments received during the public review period. This errata, together with the circulated Draft PEIR, serve as the Final PEIR for the project.

This Final PEIR is organized as follows:

1. Errata

- **Chapter 1: Introduction.** This chapter describes CEQA requirements and content of this Final PEIR.
- **Chapter 2: Response to Comments.** This chapter provides a list of agencies and interested persons commenting on the Draft PEIR; copies of comment letters received during the public review period, and individual responses to written comments.
- **Chapter 3: Revisions to the Draft PEIR.** This chapter contains revisions to the Draft PEIR text and figures as a result of the comments received by agencies and interested persons as described in Chapter 2, and/or errors and omissions discovered subsequent to release of the Draft PEIR for public review.

2. Draft PEIR

2.0 Response to Comments

CEQA Guidelines Section 15088 requires the Lead Agency to evaluate comments on environmental issues received from public agencies and interested parties who reviewed the Draft PEIR and prepare written responses. This chapter provides all written responses received on the Draft PEIR and the City of San Diego's responses to each comment.

2.1 Comments Received

A total of 17 comments were received during the 45-day comment period. Comments received are listed in Table 2-1.

Comment letters and specific comments are given letters and numbers for reference purposes (e.g. "Letter A1"). Specific comments within each letter are identified by a designator in the page margin that reflects the sequence of the specific comment within the correspondence (e.g. "A1-1" for the first comment in Letter A1). Comments are organized by public agencies (Section A), Native American Tribes (Section B), organizations (Section C), and individuals (Section D).

Table 2-1: Comment Letters Received on Draft PEIR

<i>Letter Number</i>	<i>Commenter</i>	<i>Agency/Organization</i>	<i>Date of Comment</i>	<i>Page Number</i>
<i>Section A: Agencies (Federal, State, Regional, Local)</i>				
A1	Ralph Redman	San Diego County Regional Airport Authority (SDCRAA)	April 28, 2020	FEIR-2-39
A2	Maurice Eaton, Branch Chief	California Department of Transportation (Caltrans) District 11	April 30, 2020	FEIR-2-39 through FEIR-2-42
A-3	William Yee	San Diego Gas & Electric	May 1, 2020	FEIR-2-42 through FEIR-2-43
<i>Section B: Native American Tribes</i>				
B1	Angelina Gutierrez	San Pasqual Band of Mission Indians	April 8, 2020	FEIR-2-43
B2	Shasta C. Gaughen, Tribal Historic Preservation Officer	Pala Band of Mission Indians	May 8, 2020	FEIR-2-43
<i>Section C: Organizations</i>				

C1	James W. Royle, Jr., Chairperson	San Diego County Archaeological Society, Inc.	March 27, 2020	FEIR-2-44
C2	Bryce Niceswanger, Chair	Serra Mesa Planning Group	March 27, 2020	FEIR-2-44 through FEIR-2-45
C3	Bruce Coons, Executive Director	Save Our Heritage Organization	March 30, 2020	FEIR-2-46
C4	Paul E. Robinson of Hecht Solberg Robinson Goldberg & Bagley LLP	Kearney Lodge Mobile Home Park	April 27, 2020	FEIR-2-46
C5	Tim Haidinger	Haidinger Properties	April 28, 2020	FEIR-2-46
C6	Andrew Meyer, Director of Conservation	San Diego Audubon Society	May 1, 2020	FEIR-2-46 through FEIR 2-47
C7	Andrea Contreras Rosati of Vanst Law	Sunroad Enterprises	May 1, 2020	FEIR-2-47
C8	Frank Landis, Conservation Chair	California Native Plant Society	May 1, 2020	FEIR-2-48
<i>Section D: Individuals</i>				
D1	Cindy Moore	N/A	April 16, 2020	FEIR-2-48 through FEIR-2-49
D2	Denise Davidson	N/A	April 20, 2020	FEIR-2-49
D3	Tri Nguyen	N/A	April 27, 2020	FEIR-2-50
D4	Sandra Stahl	N/A	April 30, 2020	FEIR-2-50

2.2 Lead Agency Responses

This section includes responses to each comment, in the same order as presented in Table 2-1. The responses are marked with the same number-letter designator as the comment to which they respond. Responses focus on comments that raise important environmental issues or pertain to the adequacy of analysis in the Draft PEIR or to other aspects pertinent to the potential effects of the proposed CPU on the environment pursuant to CEQA. Comments that address policy issues, opinions or other topics beyond the purview of the Draft PEIR or CEQA are noted as such for the public record. Where comments are on the merits of the proposed CPU rather than on the Draft PEIR, these are also noted in the responses. Where appropriate, the information and/or revisions suggested in the comment letters have been incorporated into the Final EIR. These revisions are included in Chapter 3 of this Final PEIR: Revisions to the Draft PEIR. Where sections of the Draft PEIR are excerpted in this document, the sections are shown indented. Changes to the Draft PEIR text are shown in underlined text for additions and strikeout for deletions.

April 28, 2020

City of San Diego
Planning Department
Attn: Lisa Lind
9485 Aero Drive, MS 413
San Diego, CA 92123

Re: Kearny Mesa Community Plan Update – Comments on Draft Program Environmental Impact Report

Dear Ms. Lind:

The San Diego County Regional Airport Authority (SDCRAA) appreciates the opportunity to review and provide comments on the Draft Program Environmental Impact Report (PEIR) for the Kearny Mesa Community Plan Update (CPU).

A1-1

As discussed in the Draft PEIR, SDCRAA serves as the Airport Land Use Commission (ALUC) for San Diego County. Pursuant to California Public Utilities Code §21676(b), amendments to a general or specific plan, zoning ordinance, or building code within an Airport Influence Area (AIA) are subject to review by the local ALUC for a determination of consistency with the applicable Airport Land Use Compatibility Plan (ALUCP). The proposed CPU affects land that is located within the AIAs for the adopted Montgomery-Gibbs Executive Airport and MCAS Miramar ALUCPs and is therefore subject to ALUC review. On April 22, 2020, we received the City's application for an ALUC consistency determination for the CPU and SDCRAA staff are currently reviewing the submitted application information.

Concerning the Draft PEIR, SDCRAA staff have the following comments:

Section 1.2.2.6 San Diego County Regional Airport Authority, p 1-4

A1-2

The San Diego County Regional Airport Authority (Airport Authority) 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.

Section 4.6.3.5 City of San Diego Municipal Code p 4-34

A1-3

b. Airport Land Use Compatibility Zone

The SDMC addresses issues related to safety compatibility in the airport land use compatibility overlay zone. Chapter 13 Article 2, Division 15 establishes the Airport Land Use Compatibility Overlay Zone, which ensures that new development located within an AIA for MCAS Miramar, Montgomery- Gibbs Executive Airport, Brown Field, and Gillespie Airport is compatible with respect to airport related noise, public safety, airspace protection, and aircraft overflight areas. Regulations include safety compatibility and aircraft overflight notification.

Section 4.6.3.7 Airport Land Use Compatibility Plans, p 4-35

A1-4

The CPU area is within the AIA for both Montgomery-Gibbs Executive Airport and MCAS Miramar. The AIA serves as the boundary for the ALUCP and is divided into two review areas. Review Area 1 is defined by the combination of the 60 CNEL noise contour, the outer boundary of all safety zones, and the airspace ~~surfaces~~ 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.

Note – Threshold Siting Surfaces are only included in the SDIA ALUCP.

Section 4.9.2.3 Airport Land Use Compatibility Plans, p 4-51

A1-5

As discussed in Section 4.6.3.5(b), the CPU area is within the AIA for both Montgomery-Gibbs Executive Airport and MCAS Miramar. In addition to the policies and criteria addressing land use compatibilities, including building heights, and densities, ~~and intensities~~, the ALUCPs contain policies and criteria concerning noise (in Section 3.3 of both of ALUCPs).

Section 5.8.4.1 b. Airport Land Use Compatibility Overlay Zone Regulations, p 5.8-8

A1-6

The purpose of the Airport Land Use Compatibility Overlay Zone is to implement adopted Airport Land Use Compatibility Plans as applicable to property within the City. The Overlay Zone is intended to ensure that new development located within an AIA is compatible with respect to airport-related noise, ~~public~~ safety, airspace protection, and aircraft overflight areas.

Note – portions of the CPU area would also fall within the FAA Noticing Area for MCAS Miramar.

Section 5.8.4.3 Issue 3: Consistency with Adopted Airport Land Use Compatibility Plans, p 5.8-13

A1-7

c. ALUCP Consistency

For portions of the CPU area within the overflight notification area for Montgomery-Gibbs Executive Airport and/or MCAS Miramar, an overflight notification agreement must be recorded with the Office of the County Recorder for any new dwelling unit. 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 by the ALUC. Future development within the CPU area would be subject to compliance with these requirements.

Note - Since the City already implemented Overflight, via rezoning the parcels into the ALUCOZ when it was adopted by the City Council, this would not seem applicable.

Section 8.1 Development and Identification of Alternatives, p 8-3

A1-8

Regardless of alternative land uses and density considerations, the Airport Influence Areas (AIA) of both the Montgomery-Gibbs Executive Airport and MCAS Miramar ALUCPs also extend into Kearny Mesa. The ALUCPs outline additional land use and development restrictions, such as density, **intensity**, and height that would apply under all alternatives. The Federal Aviation Administration (FAA) regulates airspace to protect the approach, departure, and circling airspace near airports. Therefore, proposed development on sites within the AIA are reviewed by the FAA and in some cases would be subject to limitations due to proximity to airports.

SDCRAA appreciates the continued communication and coordination between our agencies on land use compatibility matters. Please contact me if you have any questions at (619) 400-2464 or rredman@san.org.

Thank you,



Ralph Redman
Manager, Airport Planning

cc: Brendan Reed, SDCRAA, Director Planning & Environmental Affairs

DEPARTMENT OF TRANSPORTATION

DISTRICT 11

4050 TAYLOR STREET, MS-240

SAN DIEGO, CA 92110

PHONE (619) 688-3137

FAX (619) 688-4299

TTY 711

www.dot.ca.gov



Making Conservation
a California Way of Life.

April 30, 2020

11-SD-15, 52, 163, 805

PM VAR

Kearny Mesa Community Plan Update

DEIR/SCH#2018111024

Ms. Rebecca Malone

City of San Diego

9488 Aero Drive

San Diego, CA 92123

Dear Ms. Malone:

Thank you for including the California Department of Transportation (Caltrans) in the environmental review process for the Draft Environmental Impact Report for the Kearny Mesa Community Plan Update located near Interstate 15 (I-15), State Route 52 (SR-52), State Route 163 (SR-163), and Interstate 805 (I-805). 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.

A2-1

Caltrans has the following comments:

Traffic Impact Study

A2-2

- Caltrans references the Governor's Office of Planning and Research (OPR) Senate Bill 743 based *Technical Advisory on Evaluating Transportation Impacts in CEQA* (December 2018) for guidance on the development of VMT based Transportation Impact Studies. Caltrans recommends use of OPR's significance thresholds for determination of transportation impacts from land use projects. OPR's *Technical Advisory on Evaluating Transportation Impacts in CEQA* is available online at <http://opr.ca.gov/ceqa/updates/sb-743/>.
- The State agrees with the conversion of Balboa Ave and Clairemont Mesa Blvd from a 6-Lane Major Arterials to SMART Corridors – Mentioned under Section 4 "Roadway Facilities" and figure 4-4. The added Class IV cycle

A2-3

track is an excellent idea as well. Major geometry changes would have to take place at the northbound (NB) Interstate 805 (I-805)/Clairemont Mesa Blvd intersections, the NB I-805/Balboa Ave intersections, the State Route 163 (SR-163)/Balboa Ave interchange, and possibly the southbound (SB) Interstate 15 (I-15)/Balboa Ave intersections to accommodate the modification.	A2-3
<ul style="list-style-type: none"> Any modification to the existing intersection geometry and/or signal will have to comply with the Traffic Operations Policy Directive 13-02 Intersection Control Evaluation. 	A2-4
<ul style="list-style-type: none"> The mentioned "Freeway Improvements" are not funded and should not be included for the VMT analysis. Remove these improvements and re-analyze the VMT for the community. 	A2-5
<ul style="list-style-type: none"> Mitigation Measure MM-TR-1 should be able to be implemented by the City of San Diego since the community is within the City. The City is the decision-making body and it can ensure the ordinance to occur. Include the ordinance in the Programmatic Environmental Impact Report to ensure mitigation. 	A2-6
<ul style="list-style-type: none"> Please explain why the North Park area is being used for the VMT analysis Appendix E 'Statistical Results in Graphical Format'. 	A2-7
<ul style="list-style-type: none"> After Appendix E, several sheets repeat Appendices (B, C, & D) It is confusing, revise the order if needed. 	A2-8
<ul style="list-style-type: none"> Assumptions based on current RTP for Transit may not still be accurate. Though the planning assumptions were correct at the beginning of the study, actual transportation impacts and transit service may differ. 	A2-9
<ul style="list-style-type: none"> Service and transitions end within plan area, they do not fully service travel corridors that extend out of Kearney Mesa. 	A2-10
<ul style="list-style-type: none"> Two Corridor plans are currently under way for I-805 and SR-52, continued coordination on these efforts and impacts on Kearney Mesa is recommended. 	A2-11
<ul style="list-style-type: none"> Caltrans would like to review the Faculties Finance and/or fee program associated with mitigation in this area. 	A2-12

Design

<ul style="list-style-type: none"> Any proposed changes to the signal phasing at these intersections should be reviewed and concurred by Caltrans Signal Operations. 	A2-13
<ul style="list-style-type: none"> The proposed Class IV Cycle Track on Clairemont Mesa Blvd and Balboa Ave overcrossing Route 163, within Caltrans Right of Way (R/W), should 	A2-14

follow HDM standards and guidance. Any proposed non-standard features will require Design Standard Decision Document and subject to Caltrans review that may or may not be approved. Any additional loads resulting from vertical elements/barriers on these two overcrossings due to proposed Class IV Cycle Track will need to be reviewed and approved by Caltrans Structure Division.	A2-14
<ul style="list-style-type: none">Currently, at the interchange of Balboa Ave and SR-163, there are free-right entrance ramps. The proposed Class IV Cycle Track will cause conflicts at these free-right turn movement. It is recommended that the interchange needs to be modified to "T" up at the entrance ramps, similar to the interchange at Clairemont Mesa Blvd and SR-163.	A2-15
<u>Active Transportation, Complete Streets and Mobility Network</u>	A2-16
<p><i>Figure 4-1: Pedestrian Route Types - Proposed Project Conditions:</i> The proposed pedestrian network shows pedestrian facilities that will cross through Caltrans right-of-way over, under, and along the state highway system (SHS). The proposed class I multi-use path shown in Figure 4-2 is not included in Figure 4-1; however, class I paths also serve as pedestrian routes. The existing Murphy Canyon Trail (southeast corner of study area) is also not included in Figure 4-1. Consider including these multi-use paths in <i>Figure 4-1 Pedestrian Route Types – Proposed Project Conditions</i> map.</p>	
<p><i>Figure 4-2: Bicycle Network - Proposed Project Conditions:</i> The proposed bicycle network shows planned Class I, Class II, and Class IV bicycle facilities that will cross through Caltrans right-of-way other, under, and along the state highway system (SHS).</p> <p>The City should plan to coordinate early in the project development process with Caltrans District 11 Planning to navigate the Caltrans encroachment permit process for the pedestrian and bicycle network projects. Furthermore, the following Caltrans documents should be utilized to design pedestrian and bicycle facilities through Caltrans right-of-way.</p> <ul style="list-style-type: none">Caltrans Highway Design Manual (HDM): http://www.dot.ca.gov/design/manuals/hdm.htmlCalifornia Manual on Uniform Traffic Control Devices (CA MUTCD): http://www.dot.ca.gov/trafficops/camutcd/camutcd2014rev3.html	A2-17

- Caltrans Design Information Bulletin (DIB) 82-06 Pedestrian Accessibility Guidance for Highway Projects
<https://dot.ca.gov/-/media/dot-media/programs/design/documents/dib82-06-all.pdf>
- Caltrans Design Information Bulletin (DIB) 89-01 Class IV Bikeway Guidance:
<http://www.dot.ca.gov/design/stp/dib/dib89-01.pdf>

A2-17

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.

A2-18

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.

Land Use and Smart Growth

A2-19

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.

Noise

A2-20

The applicant must be informed that in accordance with 23 Code of Federal Regulations (CFR) 772, the Department of Transportation (Caltrans) is not responsible for existing or future traffic noise impacts associated with the existing configuration of I-15, SR-52, SR-163 or I-805.

Environmental

A2-21

Caltrans welcomes the opportunity to be a Responsible Agency under the California Environmental Quality Act (CEQA), as we have some discretionary authority of a portion of the project that is in Caltrans' R/W through the form of an encroachment permit process. We look forward to the coordination of our efforts to ensure that Caltrans can adopt the alternative and/or mitigation measure for our R/W. We would appreciate meeting with you to discuss the elements of the EIR that Caltrans will use for our subsequent environmental compliance.

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 approved final environmental documents for this project, corresponding technical studies, and necessary regulatory and resource agency permits. Specifically, CEQA determinations or exemptions. The supporting documents must address all environmental impacts within the Caltrans' R/W and address any impacts from avoidance and/or mitigation measures.

We recommend that this project specifically identifies and assesses potential impacts caused by the project or impacts from mitigation efforts that occur within Caltrans R/W that includes impacts to the natural environment, infrastructure (highways/roadways/on-ramps and off-ramps) and appurtenant features (including but not limited to lighting/signs/guardrail/slopes). Caltrans is interested in any additional mitigation measures identified for the DEIR.

Mitigation

A2-22

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.

A2-22

Mitigation improvements should be compatible with Caltrans concepts. Mitigation measures for proposed intersection modifications are subject to the Caltrans Intersection Control Evaluation (ICE) policy (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>).

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

A2-23

- Right-of-Way and access rights seem to be depicted correctly. Per Business and Profession Code 8771, perpetuation of survey monuments by a licensed land surveyor is required, if they are being destroyed by any construction.
- Any work performed within Caltrans 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.

Additional information regarding encroachment permits may be obtained by contacting the Caltrans Permits Office at (619) 688-6158 or by visiting the website at <http://www.dot.ca.gov/trafficops/ep/index.html>. Early coordination with Caltrans is strongly advised for all encroachment permits.

Ms. Rebecca Malone
April 30, 2020
Page 7

If you have any questions, please contact Kimberly Dodson, of the Caltrans Development Review Branch, at (619) 688-2510 or by e-mail sent to Kimberly.Dodson@dot.ca.gov.

Sincerely,

electronically signed by

MAURICE EATON, Branch Chief
Local Development and Intergovernmental Review



April 25, 2020

Ms. Rebecca Malone, Environmental Planner
City of San Diego - Planning Department
9485 Aero Drive, MS 413
San Diego, CA 92123
Via email: PlanningCEQA@sanidiego.gov

SUBJECT: Kearny Mesa Community Plan Update
Project No. 607857/SCH No. 2018111024)

Kearny Mesa Community Plan Area/Council Districts 6 & 7

RE: Response to the Kearny Mesa Community Plan Update Draft Program Environmental Impact Report

Dear Ms. Malone:

San Diego Gas and Electric Company (SDG&E) respectfully submits this letter in response to the City of San Diego's *Kearny Mesa Community Plan Update Draft Program Environmental Impact Report (Draft PEIR)*. SDG&E provides gas and electric services to customers throughout the greater San Diego County and South Orange County areas, and is regulated by the California Public Utilities Commission (CPUC). The CPUC mandates that SDG&E maintain its utility infrastructure and retain its exclusive easement rights, and several SDG&E transmission easements and facilities are located within the Draft PEIR area.

A3-1

The proposed Kearny Mesa Community Plan and associated discretionary actions (collectively referred to as the "Project") entails a comprehensive update to the Community Plan which will guide future development in the Project area. SDG&E wants to ensure that the Final PEIR adequately addresses the public utility implications of the proposed Project.

Based on a review of Figure 2-2 (Kearny Mesa Community Plan Area), the following transmission tie lines (TLs) have the potential to be impacted by the Draft PEIR:

A3-2

- TL 600
- TL 663
- TL 672
- TL 676
- TL23004/TL23001

In addition to the TLs listed above, SDG&E has numerous electric distribution lines throughout the PEIR Project area, and 1 of the 2 primary natural gas transmission pipelines (Line 1600) for the entire natural gas system in Overland Avenue that traverses through the center of the entire PEIR Project area in a north-south alignment.

Also, the other primary concern of this response letter is SDG&E's critical transmission facility operations at its Kearny Construction & Operations Center located at 5488 Overland Avenue (APNs 369-04-015), and a contiguous parcel at 9190 Clairemont Mesa Blvd. (APN 369-10-001) in the center of the Project area. The facility, which operates on a 24/7 basis 365 days a year, is located on SDG&E fee owned property and is an extremely vital component in SDG&E's transmission operations.

A3-3

Due to the critical nature of the Kearny facility, SDG&E's primary concerns are related to maintaining safe and secure operations at this location. While SDG&E understands the need for additional housing in San Diego and welcomes new residential development in Kearny Mesa, any changes in land use or development standards for Clairemont Mesa Blvd. properties adjacent to the Kearny Operations must consider compatibility with SDG&E's facilities. Any development should conform to utility owned property requirements and consider impacts on protection of, and access to, SDG&E's facilities. This will ensure that SDG&E is able to properly protect and maintain critical infrastructure in the future. For these reasons, the PEIR should identify any potential issues resulting from any proposed land use changes that could result in residential development occurring adjacent to an existing SDG&E facility.

Also, the Draft PEIR does not specifically address or discuss the need to relocate or alter any SDG&E facilities. There is a brief mention on Page 3-15, Table 3-7 "POTENTIAL FUTURE DISCRETIONARY ACTIONS ASSOCIATED WITH THE PROPOSED PROJECT". If these relocations or alterations are required, they should be discussed in the PEIR. SDG&E has specific processes for analyzing any potential changes or impacts to our electric and/or gas facilities that are initiated by private and/or public agency development projects.

A3-4

We appreciate the opportunity to respond to this Draft PEIR issuance. Should you have any questions, please feel free to contact me at 619-857-8922 or wye@sdge.com.

Sincerely,



William "Bill" Yee
Project Manager - II
Environmental Project Permitting & Construction | Environmental Services
SDG&E

cc: Richard Quasarano, Team Lead - Environmental Project Permitting & Construction, SDG&E
Adam Smith, Real Estate Portfolio Manager, SDG&E
Vanessa Mapula-Garcia, Public Affairs Manager, SDG&E
Wes Jones, Public Affairs Manager, SDG&E



SAN PASQUAL BAND OF MISSION INDIANS

SAN PASQUAL RESERVATION

April 8, 2020

Rebecca Malone
Environmental planner
Planning Department
9485 Aero Drive, MS 413
San Diego, CA. 92123

RE:607857/SCH No.2018111024

Dear Ms. Malone,

TRIBAL COUNCIL

Stephen W. Cope
Chairman

Justin Quis Quis
Vice Chairman

Tilda M. Green
Secretary-Treasurer

David L. Toler
Councilman

Joe Chavez
Councilman

The San Pasqual Band of Mission Indians Tribal Historic Preservation Office has received your notification of the project referenced above. This letter constitutes our response on behalf of David L. Toler THPO Officer.

B1-1

We have consulted our maps and determined that the project as described is not within the boundaries of the recognized San Pasqual Indian Reservation. It is, however, within the boundaries of the territory that the tribe considers its Traditional Use Area (TUA). Therefore, we request to be kept in the information loop as the project progresses and would appreciate being maintained on the receiving list for project updates, reports of investigations, and /or any documentation that might be generated regarding previously reported or newly discovered sites. Further, we may recommend archaeological pending the results of site surveys and records searches associated with the project. If the project boundaries are modified to extend beyond the currently proposed limits, we request updated information and the opportunity to respond to your changes.

B1-2

If a Certified Kumeyaay Monitor is needed for this project. San Pasqual Band of Mission Indians can provide this service for this project. We appreciate involvement with your initiative and look forward to working with you on future efforts. If you have questions or need additional information, please do not hesitate to contact me by telephone 760-651-5142 or by e-mail at THPO@sanpasqualtribe.org.

Sincerely,

Angelina Gutierrez

Angelina Gutierrez
Tribal Historic Preservation Office, Monitor Supervisor
San Pasqual Band of Mission Indians



TRIBAL HISTORIC PRESERVATION OFFICE
PALA BAND OF MISSION INDIANS
PMB 50, 35008 Pala Temecula Road | Pala, CA 92059
Phone 760-891-3510 | www.palatribe.com

May 8, 2020

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

Re: Kearney Mesa Community Plan Update

Dear Rebecca Malone:

The Pala Band of Mission Indians Tribal Historic Preservation Office has received your notification of the project referenced above. This letter constitutes our response on behalf of Robert Smith, Tribal Chairman.

B2-1

We have consulted our maps and determined that the project as described is not within the boundaries of the recognized Pala Indian Reservation. The project is also beyond the boundaries of the territory that the tribe considers its Traditional Use Area (TUA). Therefore, we have no objection to the continuation of project activities as currently planned and we defer to the wishes of Tribes in closer proximity to the project area.

B2-2

We appreciate involvement with your initiative and look forward to working with you on future efforts. If you have questions or need additional information, please do not hesitate to contact Alexis Wallick by telephone at 760-891-3537 or by e-mail at awallick@palatribe.com.

Sincerely,

A handwritten signature in black ink, appearing to read "Shasta C. Gaughen". The signature is fluid and cursive, with the first name "Shasta" being more prominent.

Shasta C. Gaughen, PhD
Tribal Historic Preservation Officer
Pala Band of Mission Indians

ATTENTION: THE PALA TRIBAL HISTORIC PRESERVATION OFFICE IS RESPONSIBLE FOR ALL REQUESTS FOR CONSULTATION. PLEASE ADDRESS CORRESPONDENCE TO **SHASTA C. GAUGHEN** AT THE ABOVE ADDRESS. IT IS NOT NECESSARY TO ALSO SEND NOTICES TO PALA TRIBAL CHAIRMAN ROBERT SMITH.

received
03/31/2020

Comment Letter C1



San Diego County Archaeological Society, Inc.

Environmental Review Committee

27 March 2020

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

Subject: Draft Program Environmental Impact Report
Kearny Mesa Community Plan Update
Project No. 607857

Dear :

I have reviewed the subject DPEIR on behalf of this committee of the San Diego County Archaeological Society.

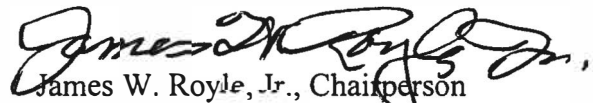
C1-1

Both Appendices F and G are well done and will serve as good bases for evaluating future projects in the community plan area. As such projects involving cultural resources enter their public review periods, please ensure SDCAS receives the appropriate notifications.

C1-

SDCAS appreciates being included in the City's environmental review process for this project.

Sincerely,


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

cc: Helix Environmental
IS Architecture
SDCAS President
File

DRAFT PEIR -- Kearny Mesa Community Plan Update / Project No. 607857 - Public Notice Date March 17, 2020

Serra Mesa Planning Group <smpeg@serramesa.org>

Fri 3/27/2020 1:15 PM

To: PLN_PlanningCEQA <planningceqa@saniego.gov>

Cc: Serra Mesa Planning Group <smpeg@serramesa.org>

 1 attachments (108 KB)

DRAFT PEIR -- Kearny Mesa Community Plan Update (Project No. 607857) - Public Notice Date March 17, 2020.pdf;

****This email came from an external source. Be cautious about clicking on any links in this email or opening attachments.****

Rebecca,

SMP received this notice in the mail. Comments are due by May 1st. Serra Mesa Borders Kearny Mesa and is heavily affected by the Community Plan update. In light of current events regarding COVID-19 the SMP has suspended meeting as instructed. This means that we are not able to review the Community Plan update by the May 1st deadline as the SMP April 16th meeting will also be postponed. I am requesting that the City extend its deadline until after the SMP May 1st meeting in order to have better community involvement.

Thank you,

Bryce Iceswanger
SMP Chair

From: Ash-Reynolds, Tara [mailto:TAshReynolds@saniego.gov] **On Behalf Of** PLN_PlanningCEQA

Sent: Tuesday, March 17, 2020 3:31 PM

To: PLN_PlanningCEQA

Subject: DRAFT PEIR -- Kearny Mesa Community Plan Update / Project No. 607857 - Public Notice Date March 17, 2020

DRAFT PEIR

Please see the attached public notice for the Draft Program Environmental Impact Report for the Kearny Mesa Community Plan Update that was distributed for public review starting today, March 17, 2020, and ending May 1, 2020.

Thank you,

CEQA & Environmental Policy Section
City of San Diego
Planning Department

C2-1



Save Our Heritage Organisation

Protecting San Diego's architectural and cultural heritage since 1969

Monday, March 30, 2020

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

Re: Kearny Mesa Community Plan Update, Project No. 607857/SCH No. 2018111024

Ms. Malone,

SOHO has reviewed the draft Kearny Mesa Community Plan Update as well as the draft Program Environmental Impact Report and its appendices.

C3-1

We agree upon the three historic themes outlined within the Historic Context Statement -- Aviation, Industry and Commercial/Retail/Office Development—as well as the identified “associated property types.” SOHO also supports the recommendations within, 1) to complete site-specific evaluations of the study list properties, 2) complete a reconnaissance survey of the plan area based upon the context statement, and 3) re-evaluate the Pan-Asian presence and influence in Kearny Mesa as a historically important theme to the development of the community, upon a sufficient passage of time.

SOHO finds the general preservation planning strategy used for the Kearny Mesa Community Plan update to be appropriate and supports the policy goals and recommendations, 3.1 through 3.9, which build off the initial list in the historic context statement. However, a specific date should be determined now, by which to re-evaluate the Pan-Asian presence in Kearny Mesa, such as 2025. Additionally, SOHO strongly supports policy 3.8, a multi-community historic context statement and Multiple Property Listing related to the aerospace industry. San Diego has a unique place in this international context, which has added to our sense of place as a city; this policy goal should be prioritized in the City's work plan.

C3-2

Thank you for the opportunity to comment,

Bruce Coons
Executive Director
Save Our Heritage Organisation

PAUL E. ROBINSON
E-Mail: probinson@hechtsolberg.com

April 27, 2020

Via E-Mail (llind@sandiego.gov)

Lisa Lind, Senior Planner
City of San Diego
Planning Department
9485 Aero Drive, M.S. 413
San Diego, California 92123

Re: **Kearny Mesa Community Plan Update**

Dear Lisa:

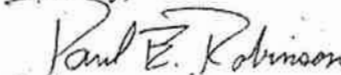
This firm represents the owners of the Kearney Lodge Mobile Home Park ("Kearney Lodge"). The Planning Department recently published a draft Kearny Mesa Community Plan Update ("Update"), which among other things, increases the density allowed for the Kearney Lodge property. We write to inform you of our and our client's strong support of this Update and the Environmental Impact Report ("EIR") necessary for the approval of the Update.

The Update acknowledges the importance of retaining Kearny Mesa's diverse employment areas, while encouraging the development and growth of residential, commercial and outdoor spaces in the community. The Update designates the Kearney Lodge property for high-density residential development alongside a designated park.

It is the intention of the owners of Kearney Lodge to redevelop the property into a high-density multifamily development, which would align with the designations and goals of the Update. The redevelopment would also improve access to the neighboring park for both the residents and the public. The design of the redevelopment would aim to help the City of San Diego achieve its housing and climate action goals.

We look forward to working with you to shape Kearny Mesa into a community where residential, commercial, employment and recreational uses are well integrated and balanced. We strongly believe that this Update and the EIR provide the appropriate guidelines to achieve that vision over the next 20 years.

Sincerely,



Paul E. Robinson

HECHT SOLBERG ROBINSON GOLDBERG & BAGLEY LLP

PER/ba

4828-3091-6027 v2

cc: Kevin Faulconer, Mayor (via email: kevinfaulconer@sandiego.gov)
Chris Cate, Councilmember (via email: criscate@sandiego.gov)
Mike Hansen, Planning Director (via email: MHansen@sandiego.gov)
Kearney Lodge Mobile Home Park

C4-1

C4-2

C4-3



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

Dear Ms. Malone,

I am writing with regard to the Kearny Mesa Community Plan Update. I have discussed the Update with Lisa Lind, who has been most helpful.

C5-1

My property is located at 8868-8898 Clairemont Mesa Blvd., adjacent to the Denny's restaurant. It is currently an older, mixed-use property of around 60,000 square feet, with some 40 tenants. In its current state the property is profitable, and I do not anticipate making major changes in the near future.

However, in the longer-term a major redevelopment of the site makes sense. I have been approached recently by two development companies about doing so, but both concluded that with the basic Community Commercial zoning that is on the property, redevelopment is not financially feasible. However, if the zoning were amended to Community Commercial (O-109 du/ac) it is likely that we could undertake a redevelopment project.

C5-2

Making that change would bring us into alignment with the adjacent site, and perhaps make a larger, joint development possible.

I realize that this request is coming late in the process, and that it would be difficult for you to accommodate my rather small project. But if other changes are to be made to the Plan that would require an update to the environmental documents, then perhaps you would consider this zoning change for my parcel.

I appreciate your consideration.

Thank you,

A handwritten signature in dark ink, appearing to read 'Tim Haidinger', is written over a light blue rectangular stamp area.

Tim Haidinger

May 1st, 2020

Lisa Lind
 Senior Planner
 619-236-6531
 Fax 619-533-5951
LLind@sandiego.gov

Dear Ms. Lind,

Thank you for the opportunity to comment on the KMCPU (Kearney Mesa Community Plan Update). San Diego Audubon Society (SDAS) is a non-profit organization with a mission to foster the protection and appreciation of birds, other wildlife, and their habitats, through education and study, and advocate for a cleaner, healthier environment. This letter will be in regard to the Biological Resources Report, November 2019. The main point SDAS would like to emphasize is the vital importance of wildlife corridors and how a more regional approach should be the standard when drafting Community Plans. Also, there will be suggestions where recommended improvements are made with a hope they will be considered and implemented. The following will discuss more broadly on these topics.

C6-1

As part of SDAS advocacy for wildlife, this includes a heightened awareness to protecting wildlife corridors. The KMCPU PEIR touches upon this on page 26, Section 3.5 Wildlife Corridors. It describes the importance of protecting genetic diversity of wildlife by providing movement between distinct wildlife habitats and also access for dispersal, foraging and mating. Other important components of protecting wildlife corridors are species adaptation to climate change. It states there are no designated regional corridors crossing the KMCPU area. Noted is the nearest regional corridor extending from west to east along San Clemente Canyon south SR-52 then transitioning north of SR-52 and continuing through MCAS Miramar. There is no referral to a map that shows a visual of these wildlife corridors. It also describes local links within and between the remaining habitat in the KMCPU area and larger areas of native habitat and MHPA surrounding the KMCPU area. There is a critical wildlife corridor that extends north to south along the east side of the plan boundary along HW-15. This is referred to as Murphy Canyon Wildlife Corridor (MCWC) and extends to the southeastern point of the KMCPU boundary. This can be seen on Figure 5 where it continues adjacent to the SDSU Mission Valley Development and connects to the San Diego River Watershed. The MCWC connects the canyons adjacent to the KMCPU along and under HW-15 and is the only functioning north-south wildlife corridor that connects to the San Diego River Watershed, which provides critical wildlife habitat and opportunities to transverse east and west. Figure 4 properly shows the MCWC marked as Riverine and Freshwater Forested/Shrub Wetland. Contrast this with Figure 5, which does not properly recognize this as it is marked as Urban/Developed Area (shaded gray). Figure 5 also does not properly identify this area as Diegan Coastal Sage Scrub as well as the area under the Friars Road and HW-15 connection ramps. It is important for these areas to be documented to properly identify habitat for sensitive wildlife. Additionally, there is a patch of Diegan Coastal Sage habitat between the Kinder Morgan plant and the golf course that allows wildlife to move from the finger canyons the Serra Mesa area to the MCWC and have access south to the San Diego River. This needs to be properly documented on Figure 5 and all described in detail in

C6-2

Section 3.2.2.2, Diegan Coastal Sage Scrub, as now it is simply described as found along the undeveloped hillsides near and within Murphy Canyon. **Will the PEIR be updated to reflect the concerns detailed above?**

C6-2

It is important and vital when discussing wildlife corridors in these environmental documents for community planning that a regional discussion takes place instead of just a focused analysis on the project site. That is why the connection of MCWC connecting the KMCPU to the SDSU Mission Valley project site in the south and its regional connection to the UCPU (University Community Plan Update) taking place in the north west corner of the KMCPU. SDSU Mission Valley planners have recognized the vital importance of MCWC and have taken measures to protect the wildlife habitat from edge effects of the new campus. There needs to be the same commitments as MCWC traverses north in the KMCPU along and under HW-15. There are very important wildlife corridors in the KCMPU in the north-west section as Rose Canyon connects to Clemente Canyon. This includes MHPA land that is at 100% Baseline Conservation Level as shown in Figure 7. There is Upland/Wetland habitat identified north of Governor Drive and San Clemente Canyon under the HW-52/ I-15 merge. There needs to be an analysis of how all these areas fit together in a more cohesive regional approach. It is stated on page 27, Section 3.5, Wildlife Corridors, “The KMCPU area is likely to support urban adapted and migrating terrestrial wildlife species (i.e., birds, mammals, reptiles and amphibians, etc.), including the coyote (*Canis latrans*), and bobcat (*Lynx rufus*), mule deer (*Odocoileus hemionus*), and mountain lion (*Felis concolor*).” Some of these animals are using the MCWC and other wildlife corridors in the KCMPU, so it is necessary to document them in Community Plans so they can be protected. These species and the habitat areas they use are critical to plan for and improve their connections, if they are located in a MHPA or MSCP Subarea Plan or even if they are not. **Will the Wildlife Corridor Section be updated to address concerns detailed above?**

C6-3

It is noted in this PEIR that guidelines written for this KMCPU when applicable will follow Section 4.3.2.3, Applicable Multiple Species Conservation Program Subarea Plan Policies, Guidelines, Directives and Objectives on page 30. The language provided in these guidelines could be improved for the KMCPU therefore the following suggestions.

C6-4

- Page 29, 4.3.2.1 Multiple Species Conservation Program Subarea Plan, the last sentence provides the framework, “Since there is undeveloped land in the KMCPU area, and that land supports sensitive plant and wildlife species both within and outside the MHPA, the City’s MSCP Subarea Plan and Implementing Agreement are applicable to development of the KMCPU area (see Figure 7).” This should be followed with a statement noting that there was not a comprehensive biological survey performed on KMCPU so vital habitat has not been identified, for example, the MCWC, and vital stretches on the north side adjacent to San Clemente Canyon that do not fall within City’s protected land within MHPA and MSCP.
- Page 32, Under Fencing, Lighting, and Signage, “Fencing or other barriers will be used where it is determined to be the best method to achieve conservation goals and adjacent to land uses incompatible with the MHPA (e.g., use of chain link or cattle wire to direct wildlife...” Additions or changes should reflect that fencing should be wildlife safe as they can get snared in the chain link and cattle wire fencing. Fencing is also used to deter entry by the public, so this fencing should allow wildlife passage through gaps along the bottom so wildlife can maintain their movement patterns and not be exposed to more harm by attempting to cross roads, through neighborhoods, or losing connections.
- Page 33, under Toxics, “Land uses, such as recreation and agriculture, that use chemicals or generate by-products such as manure, or that are potentially toxic or impactive to wildlife, sensitive species, habitat, or water quality need to incorporate measures to

reduce impacts caused by the application and/or drainage of such materials into the MHPA.” **Reduce impacts** would be replaced with **eliminate impacts**.

- Page 33, under Multi-Habitat Planning Area Land Use Adjacency Guidelines, there are some simple language changes which would be more determinative and clearer. Under Lighting, “Lighting of all developed areas adjacent to the MHPA **should** be directed away from the MHPA.” **Should** would be replaced with **must**. Under Noise, “Uses in or adjacent to the MHPA **should** be designed to minimize noise impacts.” **Should** would be replaced with **must**. Also, in this sentence, “Adequate noise reduction measures **should** also be incorporated for the remainder of the year.” **Should** would be replaced with **must**. Under Barriers, “New development adjacent to the MHPA may be required to provide barriers (e.g., non-invasive vegetation, rocks/boulders, fences, walls, and/or signage) along the MHPA boundaries to direct public access to appropriate locations and reduce domestic animal predation.” Following this should be that barriers are not harmful or a hindrance to wildlife movement in their habitat. **Will the PEIR be updated to the changes detailed above?**

It is noted that any mitigation needed for projects in the KMCPU shall be performed in accordance with the City’s ESL Regulations and Biology Guidelines. However, this does not stipulate that changes to improve wildlife protections cannot be included in the KMCPU. Following are some considerations.

- Under Section 1.5, page 35, under Public Access, Trails, and Recreation, Priority 1, “Barriers such as vegetation, rocks/boulders or fencing may be necessary to protect highly sensitive areas.” This will be noted once again that it is important to state in the KMCPU that barriers must be wildlife safe and not cause a hindrance of wildlife movement in their habitat. Priority 2, “Locate trails, view overlooks, and staging areas in the least sensitive areas of the MHPA.... and follow existing dirt roads as much as possible...” This priority should include consulting with a wildlife biologist and a plant ecologist for existing dirt roads might not be in the most beneficial place and new trails will benefit with expert consideration. Priority 3, “In general, avoid paving trails unless management and monitoring evidence shows otherwise.” This sentence is unclear and should be clarified. “Clearly demarcate and monitor trails for degradation and off-trail access and use.” Different kinds of off-trail use such as hiking and mountain biking have profound effects on trails and cause damage to wildlife habitat. This section should provide clarity on how these will be managed. Priority 4, “For the most part, do not locate trails wider than four feet in core areas or wildlife corridors.” **There should be no trails in wildlife corridors.** Please have this updated. Priority 7, “Locate developed picnic areas near MHPA edges or specific areas within the MHPA, in order to minimize littering, feeding of wildlife, and attracting or increasing populations of exotic or nuisance wildlife (opossums, raccoons, skunks). Where permitted, restrain pets on leashes.” There can be an argument that picnic tables cause all the negative consequences described and studies should be consulted. Pets should be on leashes at all time when in or near wildlife habitat and should be enforced.
- Under Litter/Trash and Materials Storage, page 36, Priority 1, “Provide and maintain trash cans and bins at trail access points.” Use trash cans that are wildlife resistant and they cannot access contents. Priority 3, “**Prohibit permanent storage** of materials (e.g., hazardous and toxic chemicals, equipment, etc.) within the MHPA and ensure appropriate storage per applicable regulations in any areas that may impact the MHPA, due to potential leakage.” The beginning of this sentence should be changed to **Prohibit storage**, due to the vagueness of the word permanent. No storage of dangerous material

in wildlife habitat. Priority 4, “Keep wildlife corridor undercrossings free of debris, trash, homeless encampments, and all other obstructions to wildlife movement.” This should include passive recreation such as hiking trails. Wildlife corridor habitat must be protected and left to its natural state as much as possible.

- Under Invasive Exotics Control and Removal, Page 37, Priority 1, #1 “Do not introduce invasive non-native species into the MHPA.” This should include all wildlife land use and land use adjacent not just within MHPA. Priority 1, #2, “Remove giant reed, tamarisk, pampas grass, castor bean, artichoke thistle, and other exotic invasive species from creek and river systems, canyons and slopes, and elsewhere within the MHPA as funding or other assistance becomes available.” This should include wildlife habitat outside MHPA land when resources are available. “Monitor the areas and provide additional removal and apply herbicides if necessary. If herbicides are necessary, all safety and environmental regulations must be observed.” Consultation with the California Native Plant Society is a requirement here as herbicides have many unexpected consequences not just to native plant but the many species that interact with them. Priority #3, “Eventual replacement by native species is preferred.” This sentence should be written as “Eventual replacement by native species will be a priority.” Priority #4, “On a case by case basis some limited trapping of non-native predators may be necessary at strategic locations, and where determined feasible to protect ground and shrub-nesting birds, lizards, and other sensitive species from excessive predation.” There should be the addition that this will be done with consultation and coordination with CDFW. **Will the PEIR be updated to address the concerns detailed above?**

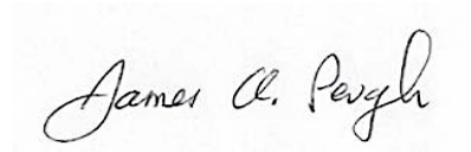
- Under Flood Control, page 38, Priority 1, “Perform standard maintenance, such as clearing and dredging of existing flood channels, during the non-breeding or nesting season of sensitive bird or wildlife species utilizing the riparian habitat. For the least Bell's vireo, the non-breeding season generally includes mid-September through mid-March.” This should require the supervision of a CDFW Wildlife Biologist/Ornithologist. **Will the PEIR be updated to address the concerns detailed above?**

Section 4.4, KEARNY MESA COMMUNITY PLAN POLICIES, page 45, Table 5, presents goals and policies for biological resources in the Conservation Element for the KMCPU area. Below are suggestions that will provide further protections for wildlife and their habitat in the KMCPU.

- Use best available anti-bird strike methods on any new buildings or structures that have windows or other reflective surfaces.
- Identify wildlife corridors whether or not they are within MHPA or MSCP Subarea Plans. Identify how these connect to other identified wildlife corridors in the vicinity and consult with CDFW to prevent fragmentation. All related environmental studies within KMCPU will analyze wildlife corridors with a regional perspective.
- Protect against edge effects to wildlife habitat and ensure proper buffer areas are present to deter human impacts and intrusion.

Thank you for the opportunity to comment on the KMCPU (Kearney Mesa Community Plan Update). San Diego County continues to grow and the regional wildlife often pay a steep price. Wildlife Corridors that have been disturbed or abolished we can never get back. It is with utmost importance the Community Planners take a regional approach and more detailed an extensive analysis when drafting their policies. SDAS looks forward to your reply to our letter and please keep us informed to updates of the PEIR.

Sincerely,

A handwritten signature in black ink that reads "James A. Peugh". The signature is written in a cursive style with a large, looping 'J' and a distinct 'P'.

James A. Peugh
Conservation Chair
peugh@cox.net

A handwritten signature in blue ink that reads "John J. Riedel". The signature is written in a cursive style with a large, looping 'J' and a distinct 'R'.

John Riedel
Conservation Committee member
riedel8837@gmail.com

April 30, 2020

By email only: llind@sandiego.gov

Lisa Lind
Senior Planner
City of San Diego
Planning Department

Re: Comments to the Draft Program Environmental Impact Report prepared
for the Kearny Mesa Community Plan Update

Dear Ms. Lind:

I represent Sunroad Enterprises (“Sunroad”), a forty-year old San Diego family business with considerable real estate holdings and business interests in the Kearny Mesa community planning area. I was honored to be a member of the subcommittee advising City staff on the plan update; however, these comments are made in my capacity as a representative for Sunroad. As you know, they reflect Sunroad’s concerns from the inception of this process.

C7-1

These comments are focused on the Kearny Mesa Community Plan Update (Plan Update) policies, and the DEIR’s analysis of, encouraging mixed-use development along Convoy street—more specifically, including residential use in that area. As is discussed more in detail below, the DEIR’s project description is inaccurate under CEQA and further, the proposed project is both inconsistent with the City’s General Plan and the Plan Update itself.

Comment 1: The Project Description Does Not Accurately Portray Existing Conditions on Convoy

C7-2

The DEIR must include an accurate project description that does not minimize project impacts. *County of Inyo v City of Los Angeles* (1977) 71 CA3d 185, 199. On page 3-7, the DEIR states “[t]he Convoy Corridor village area builds on an area with a mix of restaurants, entertainment, retail and office uses.” This statement leads the reader to believe the Convoy Corridor is already a village in the making and ignores the larger commercial uses on that street.

The following commercial/industrial businesses, often block-wide, are currently located on Convoy Street between Clairemont Mesa Boulevard to Balboa Avenue:

- Kearny Mesa Subaru
- Pacific Honda

- Pacific Honda Service Center
- Clairemont Equipment Rental
- Kearny Mesa Infiniti
- K&S Auto Finder
- Jaguar San Diego
- K&S Auto Sales
- CarMax
- Aston Martin San Diego

C7-2

The existence of these automobile sales and service land uses is practically ignored in the DEIR. Without an adequate project description, i.e., one frankly discussing how the policies of the Plan Update will impact these land uses, the DEIR cannot provide a full environmental analysis. The public and decisionmakers will not be informed of the true impacts of the project. *See Laurel Heights Improvement Ass'n v Regents of Univ. of Cal.* (1988) 47 C3d 376. Unless this error is resolved, the DEIR is legally inadequate.

Comment No. 2: The Plan Update is Inconsistent with the Policies of the General Plan

C7-3

CEQA requires environmental impact reports to analyze the consistency of a project with applicable local plans, including General Plans. *See Napa Citizens for Honest Gov. v. Napa County Board of Supervisors* (2001) 91 Cal.App.4th 342, 386-87; Guidelines, Appendix G, § X (b). The City of San Diego's General Plan and Land Use Element calls for the siting of mixed uses where these uses would be compatible with surrounding land uses. *See e.g., San Diego General Plan Policies LU-A.3., LU-A.5., and LU-B.3.*

Kearny Mesa is home to many automobile dealerships, and Sunroad owns several on Convoy Street. These dealerships are of vital importance to San Diego's tax base. AECOM prepared an Economic Impact Report for the Plan Update, and that report identifies the Convoy Street corridor with its numerous dealerships as garnishing one the highest annual sales tax revenues in Kearny Mesa at \$3.8 million. *Kearny Mesa Economic Context Report*, p. 32 (AECOM 2017).

Automobile dealerships are not compatible with residential uses. Dealerships generate a great deal of noise, including large trailer deliveries early in the morning and late at night. Dealership campuses have loudspeaker systems also used at odd hours. Service bays create noise and smells from heavy machinery including drills and air compressors, car washes, and oil and other fluid changes. Furthermore, automobile dealerships do not promote the walkable communities desired in a mixed-use environment. Cars for sale must be displayed at the front of the lot, per manufacturer requirements. As is stated above, these are often block-long businesses, with no quaint storefront for passersby on foot.

Automobile dealerships must comply with the automobile manufacturer's requirements for design and display. Regulations requiring encumbrances on the dealership sites, revenue/area-based taxes, any design regulations impacting a dealer's manufacturer design and display requirements, or any regulations requiring different frontage, parking or access than what exists today will negatively impact this industry's ability to be profitable.

C7-3

Residents are understandably intolerant of loud noises disturbing sleep, unpleasant industrial smells, and large tractor trailers parked in the median and unloading their freight. Automobile dealerships are incompatible with residential developments. Designating this area for residential mixed use is inconsistent with the policies of San Diego's General Plan, and therefore a violation of CEQA.

Comment 3: The DEIR is Inconsistent with the Plan Update

C7-4

The Kearny Mesa Community Plan update and the DEIR lists the following two policies among its project goals:

- Sustain and enhance employment areas, including industrial and commercial office uses to support the City's economy.
- Provide for vibrant economic and residential community by establishing mixed-use villages along major corridors with a range of housing types and employment uses within a distinctive pedestrian-oriented setting.

These goals are inconsistently applied by designating residential mixed use near automobile dealerships. As stated above, the introduction of a residential use in proximity to automobile dealerships and service centers will not sustain or enhance those employment areas—complaints from residents will surely cause government representatives to curtail the industry's activities. The following policies proposed by the Plan Update will also impede the automobile dealership industry on Convoy Street:

- Policy 4.7-*Upgrade pedestrian network by seeking additional ROW for non-contiguous sidewalks and parking areas.*
 - How the Policy Impedes Automobile Dealerships: Manufacturer requirements may preclude this for storefronts.

- Policy 4.36-*Proposed removal of on-street parking on Convoy Street from Clairemont Mesa Blvd. to Aero Dr.*
 - How the Policy Impedes Automobile Dealerships: On-street parking is essential for attracting customers to dealerships located on Convoy and adjacent streets.
- Policy 5.33-*Encourage MADs to finance raised, enhanced street medians.*
 - How the Policy Impedes Automobile Dealerships: This policy has been discussed for Convoy at Plan Update meetings. Automobile delivery trailers often must park in the street medians to unload new vehicles. Raised street medians with or without enhancements would preclude this long-standing practice.

C7-4

Alternative 1 is the Appropriate Alternative

C7-5

For the reasons discussed above, Sunroad supports the City's adoption of Alternative 1 (the Reduced Intensity Alternative). This Alternative rejects residential use along the Convoy Corridor, thus removing any conflict between the automobile dealerships and residential uses. Alternative 1 also removes any conflict between the General Plan and the Plan update and any internal conflicts with the General Plan and is therefore legally defensible.

California Public Resources section 21002 expresses the legislature's policy against public agencies approving projects as proposed if there are feasible alternatives to environmental impacts of those projects. *Friends of Mammoth v. Board of Supervisors* (1972) 8 Cal.3d 247 requires CEQA be interpreted "in such manner as to afford the fullest possible protection to the environment within the reasonable scope of the statutory language." *Id.* at 259 (Emphasis Added). After the "No Project" alternative, Alternative 1 is the next most environmentally superior alternative. Alternative 1 has less of an environmental impact than the proposed project and has been fully analyzed in the DEIR.

The City has not proffered substantial evidence to support choosing the proposed project over Alternative 1. Sunroad strongly recommends the City pursue Alternative 1, which is legally defensible and is consistent with the City's General Plan, supporting the City's economic health as well as properly placed land uses.

Sunroad supports residential mixed use and develops those projects in Kearny Mesa. In order for residential use to be successful, however, it must appropriately placed. Adjacency to a use causing noise and odor for up to eighteen hours a day is a recipe for conflict. The City should avoid such conflict at this stage, rather than in the future.

Thank you for the opportunity to comment. We are available for further discussion and we look forward to seeing these matters addressed in the Final Environmental Impact Report.

Sincerely,



Andrea Contreras Rosati

cc: Dan Feldman (dfeldman@sunroadenterprises.com)
Rick Vann (rvann@sunroadenterprises.com)
Chris Cate (chriscate@sandiego.gov)
Allen Young (allen@sanidiego.gov)
Aimee Faucett (afaucett@sanidiego.gov)
Mike Hansen (mhansen@sanidiego.gov)
Laura Black (lblack@sanidiego.gov)

California Native Plant Society

San Diego Chapter of the California Native Plant Society

P O Box 121390

San Diego CA 92112-1390

conservation@cnpsd.org | www.cnpsd.org

April 29, 2020

Sara Osborn, Environmental Planner
City of San Diego Planning Department
9485 Aero Drive, MS 413
San Diego, CA 92123 o
By e-mail to PlanningCEQA@sandiego.gov

RE: Kearny Mesa Community Plan Update / Project No. 607857

Dear Ms. Osborn,

Thank you for the opportunity to comment on this draft of Kearny Mesa Community Plan Update ("Plan") draft Environmental Impact Report (DEIR). CNPS promotes sound plant science as the backbone of effective natural areas protection. We work closely with decision-makers, scientists, and local planners to advocate for well informed and environmentally friendly policies, regulations, and land management practices. Our focus is on California's native plants, the vegetation they form, on keeping both plants and people safe from damaging fires, and on climate change as it affects both.

C8-1

In this case, our primary concern is that several sensitive plant species were missed in the DEIR. It is unclear whether or not they will be impacted by the updated Plan. However, their presence needs to be noted so that projects utilizing the Plan can use this information as needed. We are also concerned about the parks and street tree components. Our comments are given below.

Sensitive Plant Species

The primary species is Campbell's liverwort (*Geothallus tuberosus*, CRPR List 1B.1) which has been found (and I have seen it) at approximately (32°50'11.97"N, 117° 8'48.77"W). It perhaps grows in similar undeveloped patches along Highway 52. This occurrence was reported to the City during the Pure Water EIR, and noted by Dudek consultants at the time. It is adjacent to the restoration site for the Pure Water project on that parcel. I and other knowledgeable CNPSSD volunteers are happy to work with the City to make sure this extremely rare and unusual plant is protected. Part of providing protection for this species is to make sure it is properly documented in plans where it occurs.

C8-2

Bottle liverwort (*Sphaerocarpos drewei*, CRPR List 1B.1) may also occur in the same area, as it grows on undeveloped parcels just west of the 805 and MCAS Miramar. As with Campbell's liverwort, CNPSSD's primary interest is that it be surveyed for and avoided if found. We are happy to help with this effort.

C8-3

A third species missed is graceful tarplant (*Holocarpha virgata* ssp. *elongata*, CRPR List 4.2), which is abundant at Montgomery Field. This species has a high potential to occur

C8-4



Dedicated to the preservation of California native flora

anywhere with undisturbed Chesterton fine sandy loam. It may also occur in other soil types if conditions are suitable. A soils map in the Appendix C would have been useful for us to provide additional input.

C8-4

Finally, ashy spikemoss (*Selaginella cinerescens* CRPR List 4.1), also occurs at Montgomery Field and near the Campbell's liverwort location. It has high potential to occur in undisturbed areas of coastal sage scrub or chaparral.

C8-5

We ask that the presence of the Campbell's liverwort, graceful tarplant, and ashy spikemoss be noted, so that protection for these sensitive species can be incorporated into projects based on the updated Plan. Since the liverworts are poorly known, we are happy to assist the City in helping to find and protect these rare plants outside the CEQA process as well.

C8-6

Parks

One item we noticed in the Kearny Mesa Plan was a "Nature Discovery Park" at the corner of Convoy and Copley (Figure 28, #12 in the draft Plan). The project description (p. 120) is: "[o]n City-owned open space, at the southwesterly corner of the site, sensitively develop a small park with a mixture of permeable paving and stabilized decomposed granite pathways, picnic areas, educational areas/displays and native plant garden/ landscaping." The recommendation is: "[p]ossible native plantings and passive park improvements on conserved site. Consider facilities such as adventure/ecological play and educational displays. Provide barrier to prohibit access to habitat/sensitive areas to the east."

C8-7

This appears to contradict Community Policy 6.30 (p. 40): "Revegetate areas that have been disturbed by construction with native plant materials," primarily because of the recommendation that a "native discovery park" be "possibly" considered for native plantings, when the policy is to revegetate with natives. We suggest simply striking the "possibly" from the recommendation and planning to use native plants if the idea of developing this conserved area goes forward.

More importantly, this is an area that might contain the sensitive species listed above, and there are no specimens for the area listed in the San Diego Plant Atlas, so we have no good public information on what might be there. Our strong recommendations are therefore:

C8-8

1. To carefully survey the proposed park site and its surroundings for rare and sensitive plants and animals, following the standard protocol of looking for them when they are likely to be present. *In particular*, there needs to be a rainy season survey (a week or two after a heavy rainstorm in January or February) to look for the liverworts mentioned above. We will be happy to assist with this, since spotting the liverworts can be challenging for the uninitiated.
2. Design the park to avoid damage to sensitive species on the parcel, not just in the park site. While making it possible for people to actually use the parcel as a nature discovery park, set up access to make the construction of unauthorized trails or campsites more difficult and perhaps easier to spot. If this is not possible, perhaps the site is not idea for a developed park and should be left in conservation.
3. Revegetate after construction with species that are native to that parcel, not just available in a local native nursery. Ideally, avoid disturbing the native plants altogether.
4. Set up a plan for removal of weeds, and work to recruit volunteers to care for the parcel.

Street Trees

In general, CNPS supports the planting of native street trees in pedestrian corridors. This is a good effort, and if done correctly will also help meet the City's climate action goals.

C8-9

Thank you for taking these comments. Please keep us informed of all meetings and documents related to this Plan, at franklandis03@yahoo.com and conservation@cnpsd.org. Do not hesitate to contact us if there are questions or if you want help with the liverworts.

Stay safe,

A handwritten signature in blue ink that reads "Frank Landis". The signature is written in a cursive, flowing style.

Frank Landis, PhD
Conservation Chair
California Native Plant Society, San Diego Chapter

[EXTERNAL] Kearny Mesa Community Plan Update / Project No. 607857

Cindy Moore <c.a.moore@sbcglobal.net>

Thu 4/16/2020 11:14 AM

To: PLN_PlanningCEQA <planningceqa@sandiego.gov>

****This email came from an external source. Be cautious about clicking on any links in this email or opening attachments.****

Rebecca Malone:

There are many things that I like about the KMCP update and especially appreciate the amount of time and attention to detail that has been devoted to this project.

D1-1

I have the following questions about the draft PEIR:

- Does the plan for a Class IV cycle track on the southside of Aero require the removal of parking spaces on Aero Drive in front of the Serra Mesa-Kearny Mesa Library? If so, what would be the impact and mitigations for the library? If this isn't the case, do any of the proposals for Aero Drive require the removal of parking spaces?
- Since there is a lack of 7,100 s.f. of recreation facilities and the Serra Mesa Recreation facilities are the closest ones to Aero Village e.g., Cabrillo Height Park and the Serra Mesa Recreation Center, what will be the impact on these facilities? What are possible mitigations?
- "If proposed as part of future development, implementation of a local street would be considered compatible with the community plan for the following locations and include but are not limited to: Aero Place eastern connection to Afton Road..." Kearny Mesa Community Plan Update, pages 69-70. Were the impacts of this implementation studied? If not, what would be the planning process and would it include community input?
- The Aero/Sandrock intersection is notorious for flooding. Apparently "...there is not ample storm drain infrastructure to convey storm water below ground." Developer of Broadstone Project, Aero/Sandrock. The PEIR doesn't describe this existing problem. What will be the impact of additional development along Aero Drive on this existing problem? What are possible mitigations?

D1-2

D1-3

D1-4

D1-5

Thank you

Cindy Moore
Serra Mesa Resident

[EXTERNAL] Kearny Mesa Community Plan Update / Project No. 607857

Denise Davidson <denisedavidson1884@gmail.com>

Mon 4/20/2020 6:39 PM

To: PLN_PlanningCEQA <planningceqa@sandiego.gov>

This email came from an external source. Be cautious about clicking on any links in this email or opening attachments.

Hello;

My questions are:

- | | |
|--|------|
| 1. What studies have been done for traffic studies into and out of Serra Mesa and freeways 15 and 805? | D2-1 |
| 2. What impact will future construction projects have on the main streets, including but not limited to Aero Drive and Convoy, for cars and pedestrians? | D2-2 |
| 3. What is the environmental noise and pollution impact — both short and long term for growth in the area? | D2-3 |
| 4. Will there be any rezoning for residential housing or low income housing? | D2-4 |
| 5. What kind of businesses will be recruited to invest in the area? | D2-5 |

Thank you,
Denise Davidson

[EXTERNAL] Kearny Mesa Community Plan Update

Tri Nguyen <nguyenthuongtri@sbcglobal.net>

Mon 4/27/2020 10:58 AM

To: PLN_PlanningCEQA <planningceqa@sandiego.gov>

****This email came from an external source. Be cautious about clicking on any links in this email or opening attachments.****

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

Dear Ms. Malone:

We are the owners of the property at 4655 Ruffner Street, San Diego CA 92111. We support the Kearny Mesa Community Plan as we have learned about it recently. We do have a plan to convert our property into either an assist-living housing project for seniors or a multi-family residential building if it is allowed by the City. We do think that our planned project, along with the City's Kearny Mesa Community Plan, will result in significant improvement of the neighborhood and we do not find any possible adverse impacts on air quality, historical, archaeological or tribal cultural issues, or that our planned project to have negative visual effects on the area. We also find this area to be very convenient for public transportation and this should not significantly increase the traffic even with increased population density. We would like to be informed more about the City's Plan and we want to support it. Please contact us via this email or cal us at 858-449-3755.

Sincerely,

Thanh Chi Luong and Tri Thuong Nguyen, MD.

D3-1

[EXTERNAL] Kearny Mesa Community Plan Update / Project No. 607857

Sandra Stahl <sandramstahl@hotmail.com>

Thu 4/30/2020 10:47 PM

To: PLN_PlanningCEQA <planningceqa@sandiego.gov>

****This email came from an external source. Be cautious about clicking on any links in this email or opening attachments.****

Ms. Rebecca Malone:

There are a lot of good things that will benefit the community in the KMCP update; however, I do have some questions about the draft PEIR:

- Are there plans to remove any parking spaces on the southside of Aero Drive in front of the Serra Mesa-Kearny Mesa Library in connection with the proposed Class IV cycle track? If so, what mitigations would be made for library patrons who often need to park on the street when the library parking lot is full? D4-1
- Do any of the Aero Drive proposals require removal of parking spaces? D4-2
- Why is there going to be a lack of 7,100 s.f. of recreation facilities? That figure is significant since it is approximately the size of a baseball infield or a skate park. That lack will significantly negatively impact residents of Aero Village. That being the case, what will be the impact on Serra Mesa Recreation facilities, specifically Cabrillo Height Park and the Serra Mesa Recreation Center which will be the closest ones to Aero Village? D4-3
- What are possible mitigations to correct notorious flooding at the Aero/Sandrock intersection which happens during the rainy season? There is no mention of this existing problem in the PEIR. Will additional development along Aero Drive exacerbate this flooding problem which the Developer of Broadstone Project, Aero/Sandrock attributes to "... not ample storm drain infrastructure to convey storm water below ground." ? D4-4
- The Kearny Mesa Community Plan Update, pages 69-70 states "If proposed as part of future development, implementation of a local street would be considered compatible with the community plan for the following locations and include but are not limited to: Aero Place eastern connection to Afton Road..." Were the impacts of this possible implementation studied? If not, what would be the planning process and would it include community input? D4-5

Thank you,
Sandra Stahl
Serra Mesa Resident

A. AGENCIES**A1 Airport Authority**

- A1-1 Comment noted.
- A1-2 Comment noted. Section 1.2.2.6, San Diego County Regional Airport Authority, has been revised in the Final PEIR (see Section 3.1, Revisions to the Draft PEIR).
- A1-3 Comment noted. Section 4.6.3.5, City of San Diego Municipal Code, has been revised in the Final PEIR (see Section 3.1, Revisions to the Draft PEIR).
- A1-4 Comment noted. Section 4.6.3.7, Airport Land Use Compatibility Plans, has been revised in the Final PEIR (see Section 3.1, Revisions to the Draft PEIR).
- A1-5 Comment noted. Section 4.9.2.3, Airport Land Use Compatibility Plans, has been revised in the Final PEIR (see Section 3.1, Revisions to the Draft PEIR).
- A1-6 Comment noted. Section 5.8.4.1 b., Airport Land Use Compatibility Overlay Zone Regulations, has been revised in the Final PEIR (see Section 3.1, Revisions to the Draft PEIR).
- A1-7 Comment noted. Section 5.8.4.3 Issue 3: Consistency with Adopted Airport Land Use Compatibility Plans has been revised in the Final PEIR (see Section 3.1, Revisions to the Draft PEIR).
- A1-8 Comment noted. Section 8.1, Development and Identification of Alternatives, has been revised in the Final PEIR (see Section 3.1, Revisions to the Draft PEIR).

A2 Caltrans

- A2-1 Comment noted.
- A2-2 Comment noted. Table 5.12-1 in Section 5.12.3 of the PEIR provides the significance thresholds used to determine the transportation impacts of the proposed project. These thresholds were developed based on Senate Bill (SB) 743 legislation and the Governor's Office of Planning and Research's (OPR) Technical Advisory on Evaluating Transportation Impacts in CEQA, which covers specific changes to the CEQA guidelines and contains OPR's technical recommendations related to the use of vehicle miles traveled (VMT) as the preferred CEQA transportation metric. Therefore, the VMT thresholds and methodologies for determining transportation impacts referenced in the proposed project's PEIR and Transportation Impact Study are consistent with Caltrans recommendation.
- A2-3 The comment does not address the adequacy or completeness of the Draft PEIR. Comment noted.
- A2-4 Comment noted. For intersections where there are proposed project modifications and are under Caltrans jurisdiction, such as locations at interchanges, intersection control evaluation (ICE) analyses could be considered as a first step to define detailed improvements in the project-level development and design process. Section 4.12.1.2 in the Final PEIR has been

revised to include the correct Traffic Operations Policy Directive (i.e., TOPD #13-02) reference for Caltrans' ICE process (see Section 3.1, Revisions to the Draft PEIR).

- A2-5 These comments do not address the adequacy or completeness of the Draft PEIR but are part of the administrative record and will be considered by the City during the decision-making process.

SANDAG's shelf Series 13 Activity Base Model (ABM) used for Year 2050 traffic projections reflects the Revenue Constrained scenario of the San Diego Forward: The Regional Plan (October 2015), the currently adopted regional transportation plan (RTP). All freeway improvements assumed under the Community Plan Update were projects identified in this adopted RTP and are included as a baseline in the ABM used for traffic projections and VMT analysis.

- A2-6 Comment noted. The mitigation measure of implementation of a VMT ordinance has not yet been brought to City Council as an action item. Since the adoption by this decision-making body cannot be ensured to occur, the mitigation measure is not implementable at this time and analysis of implementation of such an ordinance has not been included in the PEIR.

- A2-7 This comment does not address the adequacy or completeness of the Draft PEIR but is part of the administrative record and will be considered by the City during the decision-making process.

Appendix E 'Statistical Results in Graphical Format' is an appendix to the Vehicle Miles Traveled Calculation Using the SANDAG Regional Travel Demand Model – Technical White Paper, which is Appendix A of the PEIR's Transportation Impact Study (TIS). The body of this technical white paper is missing in Appendix A and only its appendices were included in the Draft PEIR's TIS. In the Final TIS, Appendix A has been updated to include the content of the technical white paper only. The technical white paper's appendices were removed from Appendix A since it was mostly example application of the VMT calculation using SANDAG's model for other communities, such as North Park, and are not relevant to the Proposed Project.

- A2-8 This comment does not address the adequacy or completeness of the Draft PEIR, but is part of the administrative record and will be considered by the City during the decision-making process.

The appendices causing confusion are part of the Vehicle Miles Traveled Calculation Using the SANDAG Regional Travel Demand Model – Technical White Paper, which is Appendix A of the PEIR's Transportation Impact Study (TIS). In the Final TIS, the appendices to Appendix A were removed, correcting any appendix sheet repetition. Please also see response A2-7.

- A2-9 Comment noted. While the Plan considers the adopted San Diego Forward: The Regional Plan (October 2015) for planned regional transit routes, since it is the best information at the time, the Kearny Mesa Community Plan Update's Mobility Technical Report does acknowledge that SANDAG is in the process of developing the 2021 Regional Plan. This plan will bring a bold new vision to San Diego region and it is likely that the planned transit will vary from the current regional plan.

- Agency coordination is critical as SANDAG moves forward with the 2021 Regional Plan. The City of San Diego will work closely with SANDAG on transit network inputs that best accommodate the City's land use visions. In the updated Kearny Mesa Community Plan, transit-focused policies (e.g., 4.1, 4.3, and 4.4) are included to ensure coordination with SANDAG and MTS on the planning and implementation of transit infrastructure and service enhancements within the community, including light rail and/or bus rapid transit to serve areas of future residential and employment uses.
- A2-10 Section 5.12.1.1 in the PEIR describes the transportation study area is defined as the "study area that encompasses the Kearny Mesa Community Planning area (CPU area) plus one segment and intersection beyond, where not separated by freeways and natural barriers." All service corridors and mobility networks were only assessed within this defined study area that was established at the start of the Proposed Project's planning process.
- A2-11 This comment does not address the adequacy or completeness of the Draft PEIR but is part of the administrative record and will be considered by the City during the decision-making process.
- Comment noted. The City of San Diego is continuing to coordinate with multiple agencies, including Caltrans, on regional corridor planning efforts. City staff are part of the project teams for the Comprehensive Multimodal Corridor Plans that cover the I-805 and SR 52 freeways.
- A2-12 This comment does not address the adequacy or completeness of the Draft PEIR but is part of the administrative record and will be considered by the City during the decision-making process.
- The Kearny Mesa Community Plan Update is not proposing a change to the current Kearny Mesa Development Impact Fee (DIF), also known as the Impact Fee Study.
- A2-13 Comment noted. This comment does not address the adequacy or completeness of the Draft PEIR but is part of the administrative record and will be considered by the City during the decision-making process.
- The City recognizes the need to coordinate with Caltrans on future signal improvements at intersections under Caltrans' jurisdiction during project-level development. Policy 4.33 in the Plan states to "coordinate with Caltrans to improve signal technology, systems and coordination at freeway on-/off-ramp locations." Additionally, there are policies in place in the Mobility Element of the General Plan (e.g., ME-C.2) that support this inter-agency collaboration on transportation facilities with regional significance.
- A2-14 This comment does not address the adequacy or completeness of the Draft PEIR but is part of the administrative record and will be considered by the City during the decision-making process.
- As emphasized in Policy 4.18 in the updated Kearny Mesa Community Plan, the City recognizes the importance of coordinating with Caltrans on the planning and design of active transportation facilities, especially Class IV Cycle Tracks that would traverse interchanges. Detailed modifications within Caltrans right-of-way would be identified during the project-

level process of these active transportation improvements, and potentially through other project efforts such as the Comprehensive Multimodal Corridor Plan for the Purple Line Corridor. This work on state freeways and facilities will be developed in accordance with applicable Caltrans standards and guidelines, including the Highway Design Manual (HDM) and Design Standard Decision Document, and with the review and approval of plans from appropriate Caltrans divisions.

A2-15 Comments noted. Please see response A2-14.

A2-16 These comments do not address the adequacy or completeness of the Draft PEIR but are part of the administrative record and will be considered by the City during the decision-making process.

The City of San Diego's Pedestrian Master Plan defines pedestrian route types based on adjacent uses and characteristics of the walking environment. Figure 4-1: Pedestrian Route Types in the PEIR's Transportation Impact Study (TIS) depicts the pedestrian route typologies under buildout of the Plan, rather than the active transportation facility classification. Therefore, multi-use paths are not included in this figure.

A2-17 Comments noted. The City recognizes the need to process future Encroachments Permits for the construction of facilities that would cross Caltrans right-of-way and will coordinate with Caltrans early in the planning process for any facilities within the right-of-way. Please also see response A2-14.

A2-18 Comment noted. These comments do not address the adequacy or completeness of the Draft PEIR but are part of the administrative record and will be considered by the City during the decision-making process. Please see response A2-14.

A2-19 Comment noted. These comments do not address the adequacy or completeness of the Draft PEIR but are part of the administrative record and will be considered by the City during the decision-making process. Please see responses A2-13 and A2-14.

A2-20 Comment noted. This comment does not address the adequacy or completeness of the Draft PEIR

A2-21 Comment noted. The proposed project does not identify any specific development features that have the potential to impact Caltrans right-of-way, thus, no additional mitigation measures are identified. Please see response A2-17.

A2-22 Comment noted. Please see responses A2-13, A2-14, A2-17, and A2-21.

A2-23 Comment noted. The City recognizes the need to process future Encroachments Permits for the construction of facilities that would cross Caltrans right-of-way (see Final PEIR Section 1.2.2.4) and will coordinate with Caltrans early in the planning process for any facilities within the right-of-way.

A3 San Diego Gas & Electric

A3-1 Comment noted.

- A3-2 Comment noted.
- A3-3 Comment noted. An analysis of residential land use compatibility with industrial land uses can be found in Section 5.1, Air Quality; Section 5.6, Human Health, Public Safety, and Hazardous Materials; Section 5.8, Land Use; and Section 5.9, Noise. Additionally, Supplemental Development Regulation (SDR) 20 would apply to development within the Clairemont Mesa Boulevard Village that provides residential units on a site that is adjacent to an industrially-zoned property. SDR-20 requires the provision of a physical barrier adjacent to any and all property line(s) with an industrial zone.
- A3-4 Comment noted. The project is an update to the Kearny Mesa Community Plan and no specific development projects are proposed at this time. Future activities in the CPU area that require the relocation and/or alteration of SDG&E facilities will be coordinated with SDG&E to ensure compliance with the SDG&E Guidelines and all applicable local, state, and federal regulations, and would require a separate environmental review.

B. NATIVE AMERICAN TRIBES

B1 San Pasqual Band of Mission Indians

- B1-1 Comment noted.
- B1-2 As detailed in Section 4.5.2.5 of the PEIR, the City distributed a Notice of Preparation for the PEIR to all culturally affiliated Native American tribes, organizations, and individuals and included notification to all tribal groups in San Diego County. Consultation began in September 2017 and concluded in October 2018. The consultation process involved a review of the project scope and analysis, along with review of the draft sensitivity maps for the proposed project (see Figure 5.5-1 in the PEIR). As detailed in the PEIR, Section 5.5.4.3, proposed project areas that were identified to have tribal cultural resource sensitivity by Native American Tribes were taken into account in the development of Historical Resources Sensitivity Maps for the project areas (refer to Figure 5.5-1 in the PEIR). During review of future projects (ministerial and discretionary), the City will review these Historical Resources Sensitivity Maps to determine the potential for tribal cultural resources to be impacted. Implementation of the Historical Resources Regulations and Historical Resources Guidelines requires site-specific cultural surveys where warranted and implementation of measures to avoid or minimize impacts to the extent feasible. In accordance with this review, the City would ensure all federal, state, and local applicable regulations referenced in the comment are followed and appropriate tribes would be notified of any inadvertent discoveries. The PEIR concludes that while existing regulations would provide for the protection of tribal cultural resources, it is not possible to ensure the successful preservation of all tribal cultural resources. Therefore, potential impacts to tribal cultural resources are considered significant and unavoidable.

B2 Pala Band of Mission Indians

- B2-1 Comment noted.
- B2-2 Comment noted.

C. ORGANIZATIONS

C1 San Diego County Archaeological Society, Inc.

C1-1 Comment noted.

C1-2 Comment noted.

C2 Serra Mesa Planning Group

C2- 1 Comment noted. Pursuant to CEQA Guidelines Section 15105, the City distributed the Draft PEIR for a 45 day public review period. Please see the attached letter from the City of San Diego Planning Director.



April 9, 2020

Bryce Niceswanger
Serra Mesa Planning Group
smpg@serramesa.org

Subject: RESPONSE TO THE REQUEST FOR AN EXTENSION TO THE REVIEW PERIOD FOR THE KEARNY MESA COMMUNITY PLAN UPDATE DRAFT PROGRAM ENVIRONMENTAL IMPACT REPORT (PEIR)

Dear Ms. Niceswanger:

The City of San Diego ("City") Planning Department has received your request for an extension of public review for the Kearny Mesa Community Plan Update Draft PEIR. Public review for the Draft PEIR began on March 17, 2020 and will end on May 1, 2020.

Under the San Diego Municipal Code, the Planning Director may approve a request for extension of the public review period of a draft environmental document. Because adequate time for public comment of the Kearny Mesa Community Plan Update Draft PEIR has been provided, the Planning Department will not be extending the public review period, which will continue to end on May 1, 2020.

We look forward to comments from the Serra Mesa Planning Group and encourage the planning group to either conduct a remote meeting and submit a comment letter, or to submit comment letters as individuals by May 1, 2020.

If you have any comments or questions regarding the Kearny Mesa Community Plan Update Draft PEIR, please contact Rebecca Malone, Senior Planner at RMalone@sanidiego.gov.

Sincerely,

A handwritten signature in blue ink, appearing to read "Mike Hansen".

Mike Hansen, Director
Planning Department

MH:rm

cc: Laura Black, AICP, Deputy Director, Planning Department
Alyssa Muto, Deputy Director, Planning Department
Heidi Vonblum, Program Manager, Planning Department
Brian Schoenfisch, Program Manager, Planning Department
Rebecca Malone, AICP, Senior Planner, Planning Department
Lisa Lind, AICP, Senior Planner, Planning Department

C3 Save Our Heritage Organization

C3- 1 Comment noted.

C3-2 The comment does not address the adequacy or completeness of the Draft PEIR. In response to the commenter's CPU-related request that "a specific date should be determined now, by which to re-evaluate the Pan-Asian presence in Kearny Mesa, such as 2025", it is not possible to pre-determine what would constitute a sufficient passage of time that would be required to properly evaluate the historical significance of the Pan-Asian presence in Kearny Mesa. Therefore, adding a specific timeframe for such an analysis to Historic Preservation Policy 3.7 in the Kearny Mesa CPU would not be appropriate from a historic preservation planning standpoint. However, Historic Preservation Planning staff will monitor this policy going forward in order to determine the appropriate time and avenue for re-evaluation.

C4 Kearney Lodge Mobile Home Park

C4- 1 Comment noted.

C4-2 The comment does not address the adequacy or completeness of the Draft PEIR. Comment noted.

C4-3 The comment does not address the adequacy or completeness of the Draft PEIR. Comment noted.

C5 Haidinger Properties

C5-1 Comment noted.

C5-2 The comment does not address the adequacy or completeness of the Draft PEIR. Comment noted.

C6 San Diego Audubon Society

C6- 1 The comment does not address the adequacy or completeness of the Draft PEIR. Comment noted.

C6-2 Regional wildlife corridors providing linkages to the core areas have been established and identified throughout San Diego County with the regional planning effort of the Multiple Species Conservation Program (MSCP). The City of San Diego MSCP Subarea Plan does not identify a regional wildlife corridor in the CPU area; however, it is recognized that wildlife movement occurs in the areas identified in the comment. The City's Multi-Habitat Planning Area (MHPA) of the MSCP is conserved habitat that extends north from Friars Road into the Kearny Mesa Community Plan Area and provides a partial north-south wildlife linkage. The Kearny Mesa Community Plan Update does not propose land uses or policies that would preclude the continued use of the area identified in the comment for wildlife movement. Future projects subject to further environmental review would be analyzed under CEQA for consistency with the City's MSCP Subarea Plan and potential impacts to wildlife movement would be addressed at the time of permit application. Please refer to Section 2.3.2.5 of the Draft PEIR which identifies a wildlife corridor within San Clemente Canyon and undeveloped

areas that serves as a local wildlife linkage. The area stated in the comment on the east side of I-15 is located within the Tierrasanta Community Planning Area.

C6-3 The comment does not address the adequacy or completeness of the Draft PEIR. Comment noted.

C6-4 The comment does not address the adequacy or completeness of the Draft PEIR. Comment noted.

C6-5 The comment does not address the adequacy or completeness of the Draft PEIR. Comment noted.

C6-6 The comment does not address the adequacy or completeness of the Draft PEIR. Comment noted.

C6-7 The comment does not address the adequacy or completeness of the Draft PEIR. Comment noted.

C7 Sunroad Enterprises

C7-1 Comment noted.

C7-2 Comment noted. The existence of automobile-related businesses is considered in the proposed CPU and the analysis in the Draft PEIR. The proposed CPU includes a range of land use designations that would support existing uses in place and allow for development in line with the General Plan City of Villages Strategy that focuses growth into neighborhoods served by transit. The proposed land use and zoning allows higher intensities and residential densities along Clairemont Mesa Boulevard to correspond to higher levels of existing and planned transit facilities and service. In contrast, areas in the Convoy Corridor Village would allow a mix of uses at a medium density (refer to Figure 3-1: Planned Land Use). Specifically, the ten automobile-related businesses located along Convoy Street are in an area proposed to be designated as Community Commercial at medium residential density, and as this area is covered by a Community Plan Implementation Overlay Zone (CPIOZ), area-specific buffers would apply to some future development with residential uses. Table 3-2 in the Draft PEIR identifies automobile uses as an allowed use in the Community Commercial land use designation.

C7-3 Comment noted. Please see Response C7-2. Automobile-related uses were considered in the CPU and the associated the Draft PEIR.

C7-4 Comment noted. The comment does not address the adequacy or completeness of the Draft PEIR. Pursuant to CEQA Section 21099(d)(1), parking impacts of a residential, mixed-use residential, or employment center project on an infill site within a transit priority area are not considered significant impacts on the environment.

C7-5 The comment does not address the adequacy or completeness of the DEIR. Comment noted.

C8 California Native Plant Society

- C8- 1 Comment noted.
- C8-2 Comment noted.
- C8-3 Comment noted.
- C8-4 Comment noted.
- C8-5 Comment noted.
- C8-6 Comment noted. Section 2.3.2.3, Sensitive Plants, and Section 5.2.4.1 Issue 1: Sensitive Species has been revised in the Final PEIR to include Bottle liverwort, graceful tarplant, and ashy spikemoss in the list of sensitive species present in the CPU area (see Section 3.1, Revisions to the Draft PEIR).
- C8-7 Comment noted. Please see revised Table 8 Park and Recreation Facilities in the Final Kearny Mesa Community Plan Update Section 6 Parks, Recreation, and Open Space.
- C8-8 Comment noted. The Kearny Mesa Community Plan Update identifies the site as a location for a "Potential Nature Discovery Park" (Table 8: Park and Recreation Facilities of Kearny Mesa Community Plan Update). The exact size and design would be identified at a future time through the General Development Plan (GDP) process. Additionally, applicable regulations for biological resources is discussed in PEIR Section 4.2 and would apply to the proposed project.
- C8-9 The comment does not address the adequacy or completeness of the Draft PEIR. Comment noted.

D. INDIVIDUALS**D1 Cindy Moore**

- D1-1 Comment noted.
- D1-2 Comment noted. This comment does not address the adequacy of the Draft PEIR. Pursuant to CEQA Section 21099(d)(1), parking impacts of a residential, mixed-use residential, or employment center project on an infill site within a transit priority area are not considered significant impacts on the environment.
- D1-3 Potential impacts related to the deterioration of existing neighborhoods parks and recreational facilities in the Kearny Mesa CPU area are discussed in Section 5.10.4.2 of the PEIR. An analysis of potential impacts to Serra Mesa recreational facilities was not performed as these facilities lie outside of the Kearny Mesa CPU area boundaries.
- D1-4 Comment noted. These comments do not address the adequacy of the Draft PEIR but are part of the administrative record and will be considered by the City during the decision-making process.

Per the City's Street Design Manual, local streets are roadways that primarily provide direct access to abutting property. Since local streets have a specific function and low vehicular volumes, these roadways are not included in the circulation system of classified roadways that facilitate the traffic movement throughout the community. Local street connections mentioned in Section 4.3 Streets of the updated Kearny Mesa Community Plan, are not included as proposed circulation roadway modifications. These connections were also excluded in the analysis and impact assessment provided in the Kearny Mesa Community Plan's Mobility Technical Report and Transportation Impact Study. It should be noted that the potential Aero Place extension to Afton Road was previously studied, however upon further evaluation and community feedback it was not pursued nor included in the CPU's roadway circulation system. If it is determined at the time of redevelopment of adjacent land uses that these local streets are needed for access and circulation purposes, then it will be included as part of that development's separate project review and planning process. The process (e.g., ministerial, discretionary, local mobility analysis, etc.) and level of community input required would depend on the project details of a future redevelopment.

Revisions to the write-up of these local streets in the Plan have been made for further clarification.

- D1-5 Potential impacts associated with drainage and flooding are discussed in PEIR Chapter 5.7, Hydrology and Water Quality. As discussed therein, all future projects would be subject to the City's regulations addressing storm water run-off. Additionally, the proposed CPU includes policies 5.32, 5.33, and 5.34 that encourage the incorporation of sustainable design elements into public rights-of-way areas for storm water capture and infiltration to reduce storm water runoff, peak flows, and flooding.

D2 Denise Davidson

- D2-1 Comment noted. This comment does not address the adequacy or completeness of the Draft PEIR.
- D2-2 Construction of projects pursuant to the CPU will cause temporary operational impacts for transportation on these streets; however, since this is a project-level issue the specific construction impacts cannot be determined at this time. Once development projects are ready for construction, there would typically be a construction management plan or traffic control plan established to facilitate effective mobility through the corridors during the construction period.
- D2-3 Potential pollution impacts relating to the proposed CPU are discussed in the PEIR, please refer to Chapter 5.1 Air Quality, Chapter 5.2 Biological Resources, Chapter 5.4 Greenhouse Gas Emissions, and Chapter 5.7 Hydrology and Water Quality. Please refer to Chapter 5.9 Noise for a discussion on potential noise impacts relating to the proposed CPU.
- D2-4 Comment noted. The comment does not address the adequacy or completeness of the Draft PEIR.
- D2-5 Comment noted. The comment does not address the adequacy or completeness of the Draft PEIR.

D3 Tri Nguyen

D3-1 Comment noted.

D4 Sandra Stahl

D4-1 Comment noted.

D4-2 Please see response to comment D1-2.

D4-3 The comment does not address the adequacy or completeness of the Draft PEIR. Comment noted. Pursuant to CEQA Section 21099(d)(1), parking impacts of a residential, mixed-use residential, or employment center project on an infill site within a transit priority area are not considered significant impacts on the environment.

D4-4 See response to comment D1-3.

D4-5 See response to comment D1-5.

D4-6 See response to comment D1-4.

3.0 Revisions to the Draft PEIR

In response to comments received during public review, minor revisions and clarifications have been made to the document which do not change the conclusions of the Draft PEIR regarding the proposed CPU's potential environmental impacts and required mitigation. This chapter contains revisions to the Draft PEIR based upon (1) additional or revised information required to prepare a response to a specific comment; (2) applicable updated information that was not available at the time of PEIR publication; and/or (3) typographical errors. As defined in CEQA Guidelines Section 15088.5, minor revisions and clarifications to the document—which are shown in strikeout/underline format—do not represent “significant new information;” 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.

3.1 Revisions to the Draft PEIR

The following revisions have been made to the Draft PEIR.

1. Table ES-1 on pages ES-13 through ES-15 is revised as follows:

Table ES-1 (cont.) SUMMARY OF IMPACTS AND PROPOSED MITIGATION			
Environmental Issue	Impact	Mitigation	Significance After Mitigation
GREENHOUSE GAS EMISSIONS (cont.)			
	policies intended to support the General Plan and CAP policies and thus, impacts associated with GHG emissions would be less than significant.		
HISTORICAL, ARCHAEOLOGICAL, AND TRIBAL CULTURAL RESOURCES			
Historic Buildings, Structures, Objects, or Sites: <i>Would the proposed 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?</i>	Future development and redevelopment under the proposed project could result in the alteration of a historical resource, where implementation of the proposed project would result in increased development potential. While the SDMC and policies in the proposed CPU provide for the regulation and protection of designated and potential historical resources, it is not possible to ensure the successful preservation of all historic built environment resources within the CPU area. 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. However, even after application of the existing regulatory framework contained in the Historical Resources Guidelines and Historical Resources Regulations <u>and mitigation measure HIST 5.5-1</u> , the degree of future impacts and applicability, feasibility, and success of future avoidance measures cannot be adequately known for each specific future project at this program level of analysis. Thus, potential impacts to historic structures, objects, or sites, would be significant and unavoidable.	None required <u>Mitigation Measure HIST 5.5-1 as identified in Section 5.5.6</u>	Significant and unavoidable
Prehistoric and Historic Archaeological Resources, Sacred Sites, and Human Remains: <i>Would the proposed 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?</i>	Implementation of projects within the CPU area could adversely impact prehistoric or historic archaeological resources, including religious or sacred use sites and human remains. While existing regulations, the SDMC and proposed CPU policies would provide for the regulation and protection of archaeological resources and human remains and avoid potential impacts, it is not possible to ensure the successful preservation of all archaeological resources where new development may occur. 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	None required <u>Mitigation Measure HIST 5.5-2 as identified in Section 5.5.6</u>	Significant and Unavoidable

Table ES-1 (cont.)
SUMMARY OF IMPACTS AND PROPOSED MITIGATION

Environmental Issue	Impact	Mitigation	Significance After Mitigation
	<p>review in accordance with the City's Historical Resources Regulations and Historical Resources Guidelines.</p> <p>However, even after application of the existing regulatory framework contained in the Historical Resources Guidelines and Historical Resources Regulations <u>and mitigation measure HIST 5.5-2</u>, the feasibility and efficacy of avoidance 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 remain significant and unavoidable.</p>		
<p>Tribal Cultural Resources: <i>Would the proposed 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:</i></p> <ol style="list-style-type: none"> <i>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,</i> <i>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</i> 	<p>While existing regulations, the SDMC, and proposed CPU policies would provide for the regulation and protection of tribal cultural resources and would reduce and/or minimize potential impacts, it is not possible to ensure the successful preservation of all tribal cultural resources. However, even after application of the existing regulatory framework contained in the Historical Resources Guidelines and Historical Resources Regulations <u>and mitigation measure HIST 5.5-2</u>, the feasibility and efficacy of mitigation measures cannot be determined at this program level of analysis. Thus, potential impacts to tribal cultural resources would remain significant and unavoidable.</p>	<p>None required <u>Mitigation Measure HIST 5.5-2 as identified in Section 5.5.6</u></p>	<p>Significant and unavoidable</p>

Table ES-1 (cont.) SUMMARY OF IMPACTS AND PROPOSED MITIGATION			
Environmental Issue	Impact	Mitigation	Significance After Mitigation
<i>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.</i>			

2. Table ES-1 on pages ES-17 through ES-18 is revised as follows:

Table ES-1 (cont.) SUMMARY OF IMPACTS AND PROPOSED MITIGATION			
Environmental Issue	Impact	Mitigation	Significance After Mitigation
HUMAN HEALTH, PUBLIC SAFETY, AND HAZARDOUS MATERIALS (cont.)			
Aircraft Hazards: <i>Would the proposed project expose people or structures to a significant risk of loss, injury, or death from off-airport aircraft operational accidents?</i>	Future development projects within the CPU area would be subject to the requirements of the Montgomery-Gibbs Executive Airport and the Marine Corps Air Station (MCAS) Miramar Airport Land Use Compatibility Plans (ALUCPs), including safety compatibility and airspace protection criteria, as well as applicable sections of the SDMC. Through compliance with these requirements and implementation of the proposed CPU policy that requires future projects to be reviewed for compatibility with the safety zones, noise contours, and airspace protection surfaces identified in the applicable ALUCPs, potential hazards from airport operations would not expose people or structures to a significant risk of loss, injury, or death, from off-airport aircraft operational accidents. Therefore, impacts would be less than significant.	None required	Less than significant
HYDROLOGY AND WATER QUALITY			
Flooding and Drainage Patterns: <i>Would the proposed project result in flooding due to an increase in impervious surfaces, changes in absorption rates, drainage patterns, or the rate of surface runoff?</i>	Future development projects implemented within the CPU area would be subject to the requirements of the NPDES, the City's Storm Water Standards Manual, and the SDMC Storm Water Runoff and Drainage Regulations. In addition, the proposed CPU encourages development with sustainable design elements to capture and infiltrate water on-site. <u>Compliance with these requirements and implementation of proposed CPU policies encouraging development with sustainable design elements to capture and infiltrate water on-site would avoid significant adverse impacts.</u> Therefore, it is likely that the volume and rate of overall surface runoff within the CPU area would be reduced compared to the existing condition. Thus, impacts related to flooding from surface runoff would be less than significant.	None required	Less than significant
Flood Hazard Areas: <i>Would the proposed project place housing or other structures within a 100-year flood hazard area as mapped on a federal Flood Hazard Boundary or Flood Insurance Rate Map which would impede or redirect flood flows?</i>	Future development in accordance with the proposed project would be subject to applicable SDMC and Federal Emergency Management Agency (FEMA) requirements to ensure protection from flooding. Future development projects located within the mapped 100-year floodplain would undergo project-level analysis to determine the effects to base flood elevations and ensure that flood flows would not be impeded or redirected as a result of the development project. Thus, impacts related to flood hazard areas would be less than significant.	None required	Less than significant

Table ES-1 (cont.)
SUMMARY OF IMPACTS AND PROPOSED MITIGATION

Environmental Issue	Impact	Mitigation	Significance After Mitigation
Water Quality: <i>Would the proposed project result in a substantial increase in pollutant discharge to receiving waters and increase discharge of identified pollutants to an already impaired water body?</i>	<p>Construction of future development projects in accordance with the proposed project would be subject to applicable requirements, including either a General Construction Permit or Water Pollution Control Plan (WPCP), which would address the potential for the transport of pollutants in runoff water. Future projects would also be subject to the requirements of the Storm Water Standards Manual, Jurisdictional Runoff Management Plan, and MS4 Permit. <u>Compliance with these requirements would avoid significant adverse impacts to water quality associated with future development in the CPU area.</u> Therefore, it is likely that the quality of surface runoff within the CPU area would be improved compared to the existing condition. Therefore, future development project in accordance with the proposed project would not result in a substantial increase in pollutant discharge to receiving waters or an increase in the discharge of identified pollutants to an already impaired water body. Thus, impacts related to water quality would be less than significant.</p>	None required	Less than significant
Groundwater: <i>Would the proposed project deplete groundwater supplies, degrade groundwater quality, or interfere with groundwater recharge?</i>	<p>Groundwater within the Mission San Diego hydrologic subarea (HSA) has a potential beneficial use for municipal and domestic supply and existing beneficial uses for agricultural supply, industrial service supply, and industrial process supply. Groundwater within both the Miramar hydrologic area (HA) and Tecolote HA is exempt from municipal and domestic supply beneficial use. The Miramar HA has a potential beneficial use for industrial service supply. Storm water regulations that encourage infiltration of storm water runoff and protection of water quality would protect the quality of groundwater resources and support infiltration. As such, it is not anticipated that the proposed project would deplete groundwater supplies, degrade groundwater quality, or interfere with groundwater recharge. Thus, impacts related to groundwater would be less than significant.</p>	None required	

3. Section 1.2.2.6 on page 1-4 is revised as follows:

The San Diego County Regional Airport Authority (Airport Authority) 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.

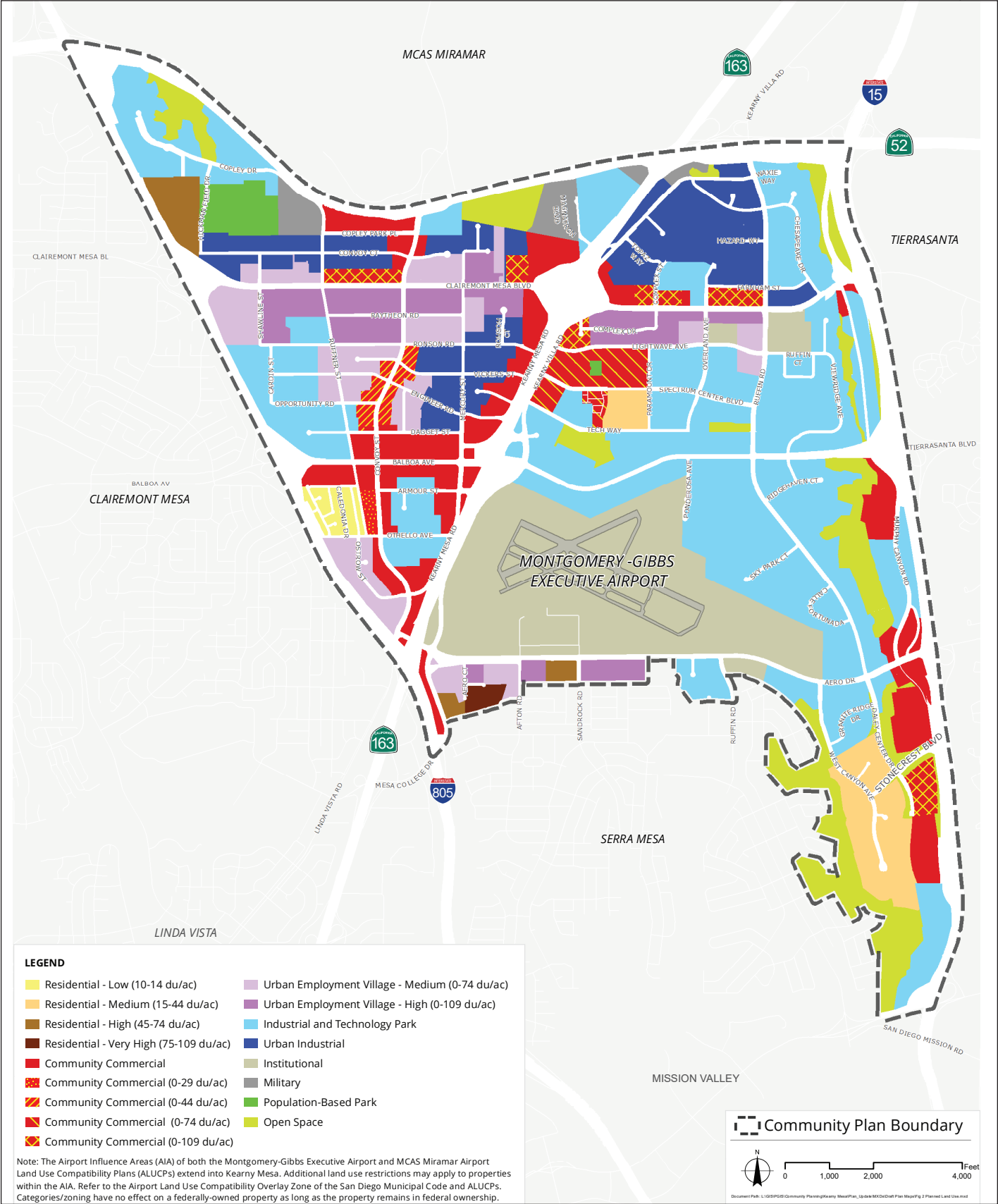
4. The second paragraph on page 2-13 is revised as follows:

A search of CNPS and California Natural Diversity Data Base (CNDDB) records (two-mile radius from the CPU area) was used to develop a matrix of additional sensitive plant species that may have potential to occur in the CPU area due to the presence of suitable habitat (e.g., vegetation communities, soils, elevation, and geographic range, life form/blooming period, etc.). The matrix is presented in Table 2-4, *Sensitive Plant Species Observed and Potential to Occur in the CPU Area*, and includes 14 additional special status plant species, their favorable habitat conditions, and their potential to occur in the CPU area. During the public review period of the draft PEIR an additional three sensitive plant species were identified as having the potential to occur in the CPU area. These three species include: Campbell's liverwort (*Geothallus tuberosus*, CNPS Rare Plant Rank 1B.1), graceful tarplant (*Holocarpha virgata* ssp. *elongata*, CNPS Rare Plant Rank 4.2), and ashy spikemoss (*Selaginella cinerescens*, CNPS Rare Plant Rank 4.1).

5. The fifth paragraph on page 2-36 is revised as follows:

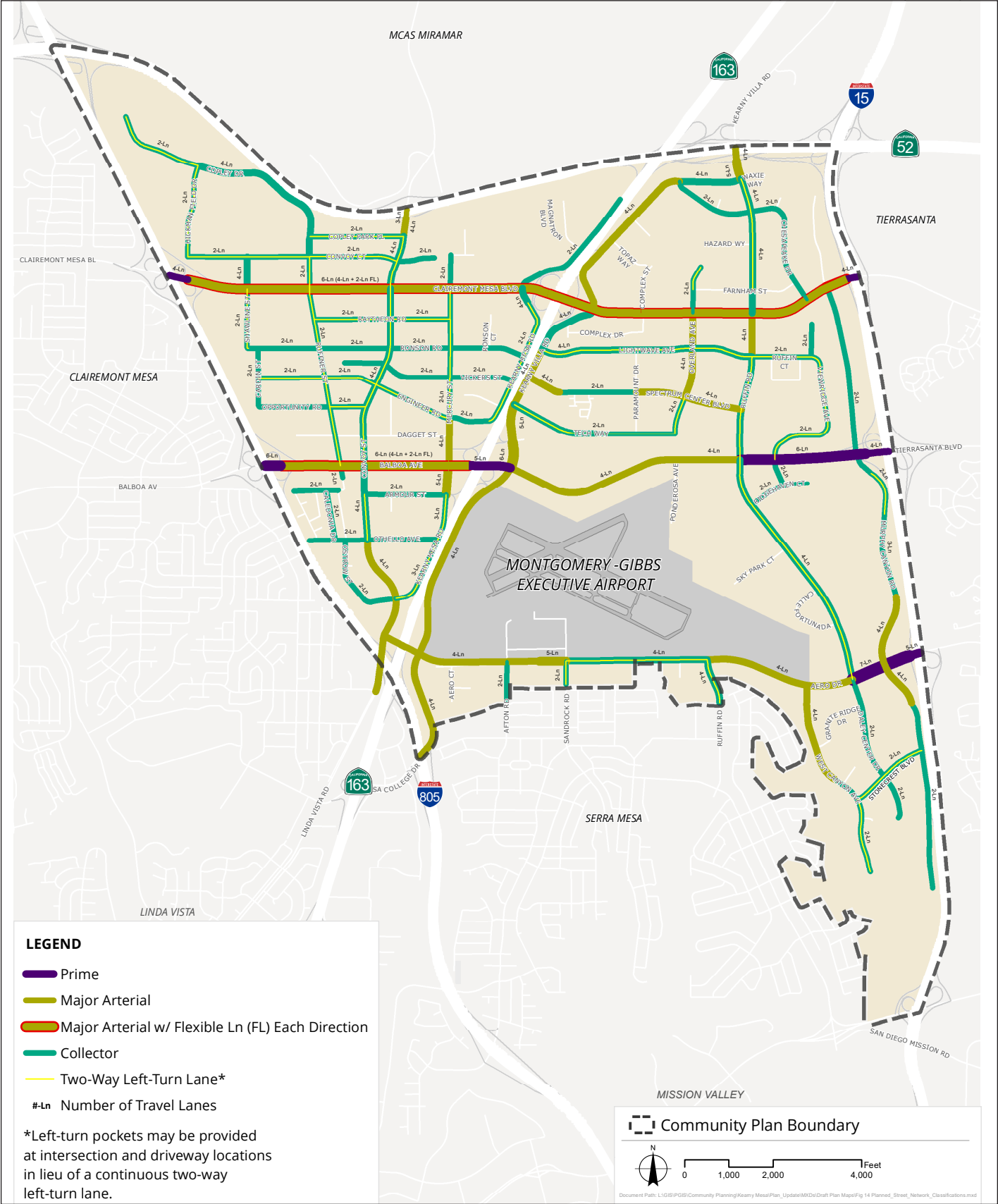
The northwestern portion of the CPU area lies within the ~~Mission Bay and La Jolla watershed~~ Mission Bay Watershed Management Area (WMA) in the Miramar (906.4) and Tecolote (906.5) hydrologic areas (HA), which are part of the Peñasquitos HU. The ~~Mission Bay WMA~~ Mission Bay and La Jolla watershed encompasses 64 square miles and is home to approximately 232,000 residents.

6. Figure 3-1 (Planned Land Use), Figure 3-2 (Planned Roadway Network Classifications), Figure 3-3 (Planned Bicycle Network), Figure 3-4 (Planned Pedestrian Routes), Figure 3-5 (Planned Transit Network), and Figure 3-6 (Proposed Zoning) are revised as follows:



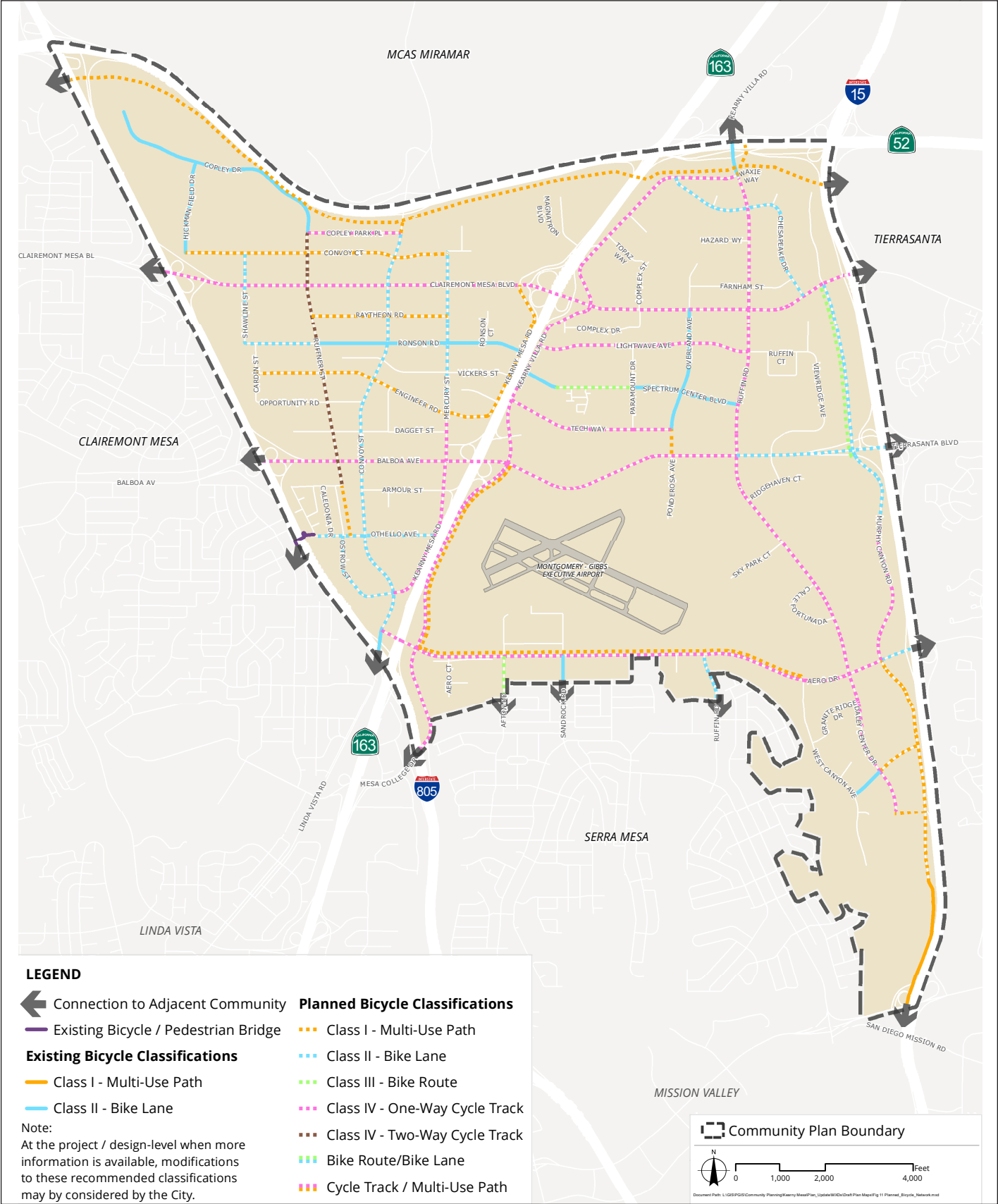
Source: City of San Diego 2020

Planned Land Use
Figure 3-1



Planned Roadway Network Classifications

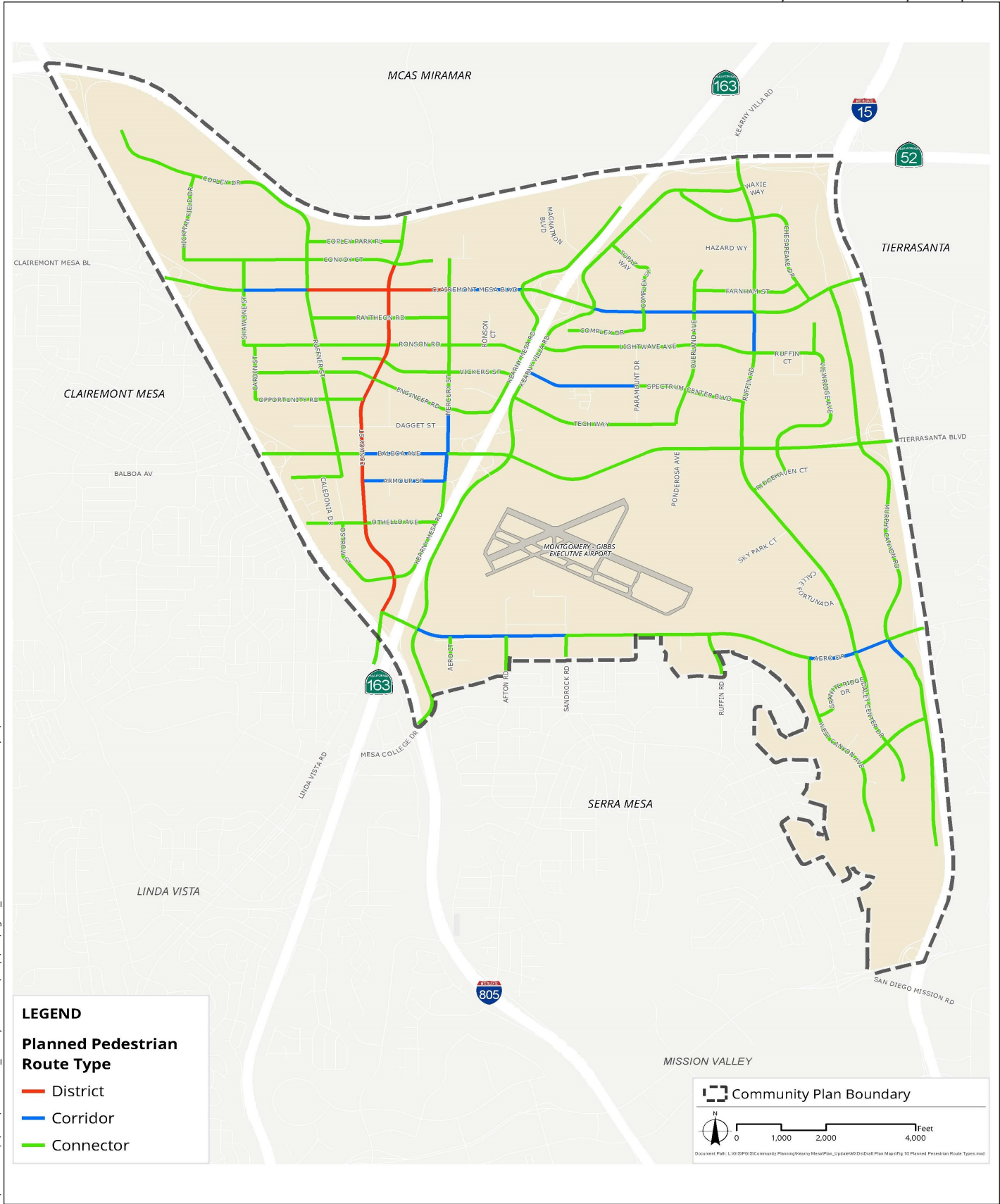
Figure 3-2



Planned Bicycle Network

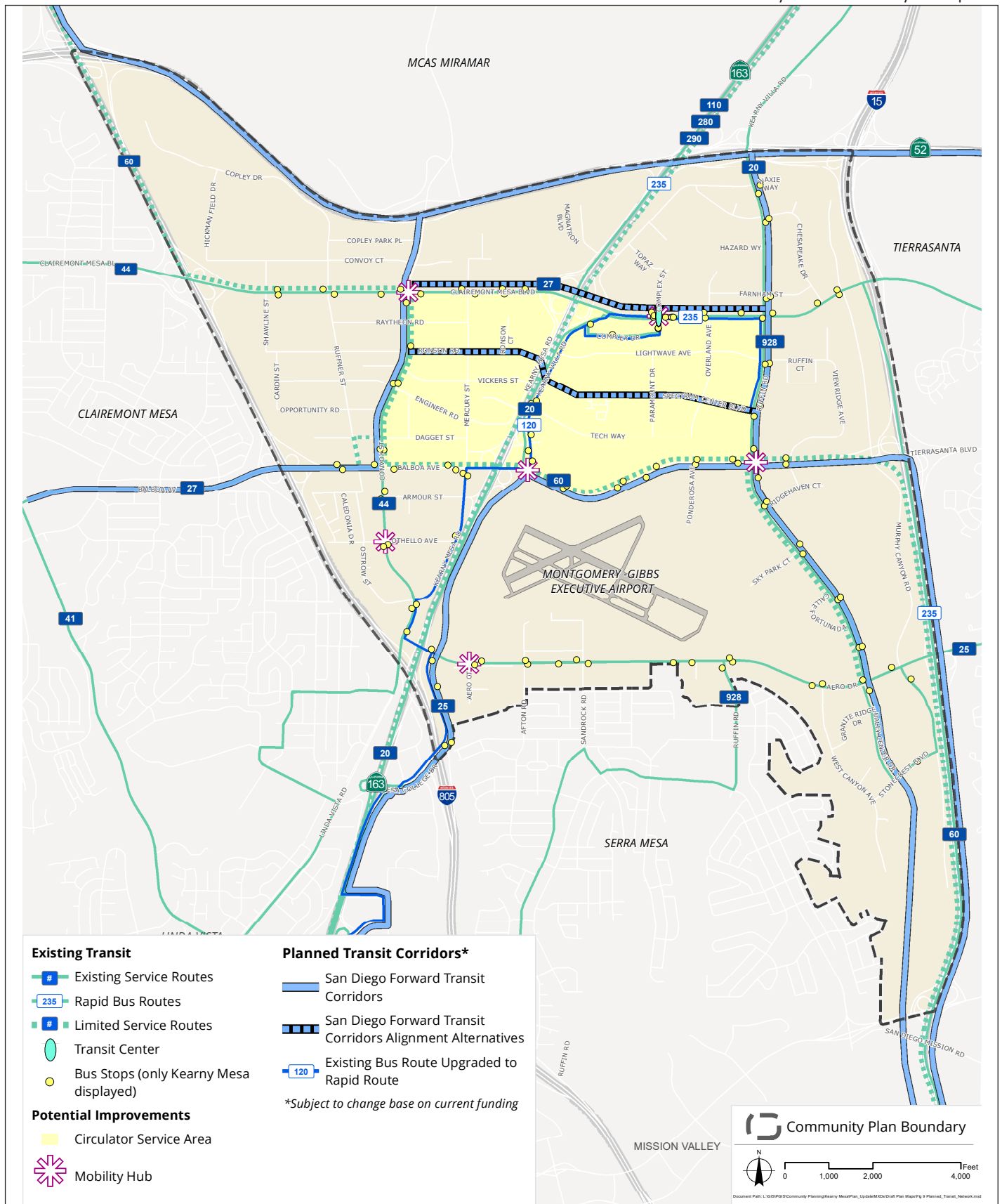
Figure 3-3

I:\PROJECTS\SDS\SDS-36.02_KearnyMesaCPU\Map\EIR\Fig3-4_PedestrianR.indd SDS-36.04 01/09/2020-RK



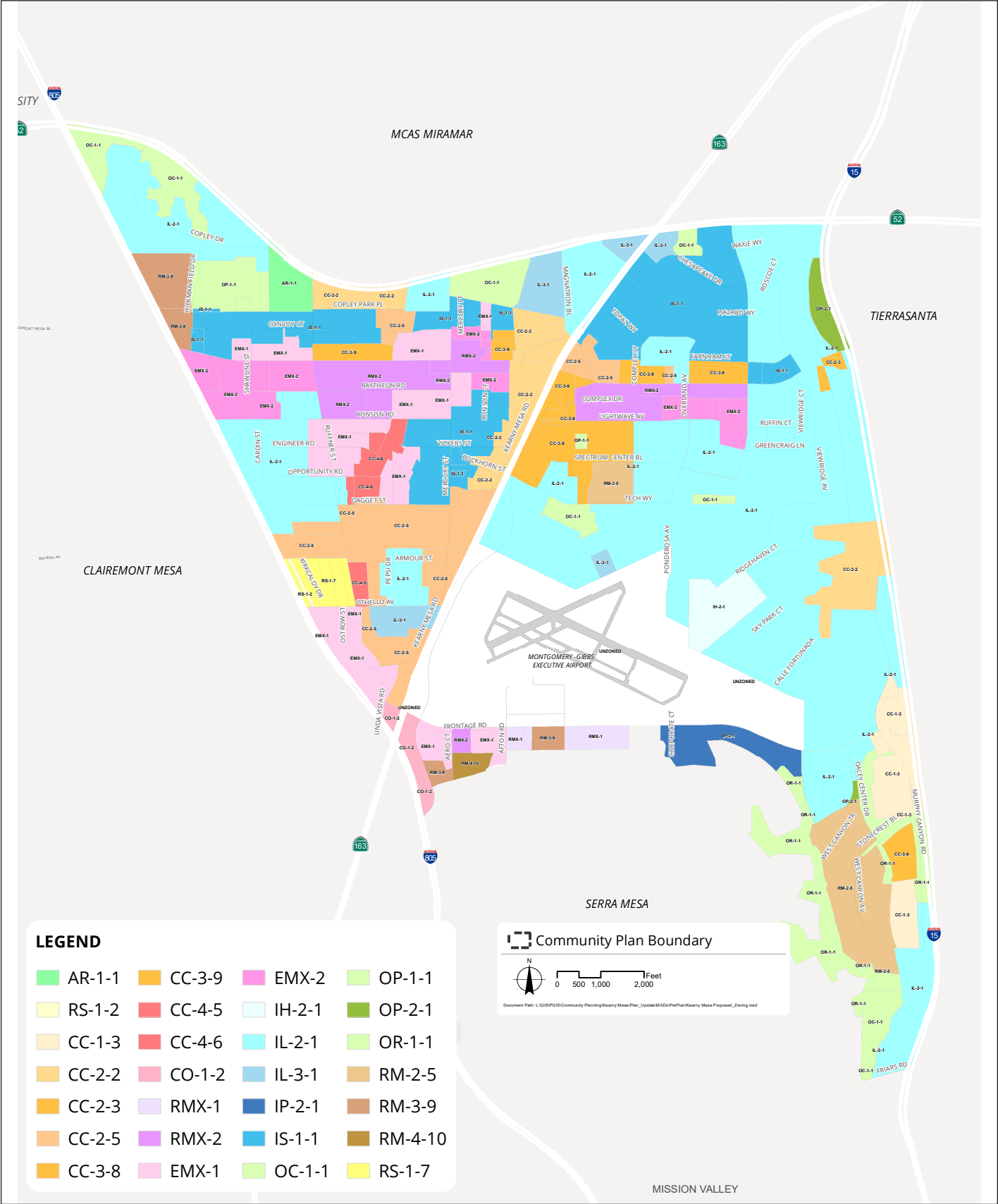
Planned Pedestrian Routes

Figure 3-4



Planned Transit Network

Figure 3-5



Source: City of San Diego 2020

Proposed Zoning
Figure 3-6

7. Section 4.6.3.5 (b) on page 4-34 is revised as follows:

Chapter 13 Article 2, Division 15 establishes the Airport Land Use Compatibility Overlay Zone, which ensures that new development located within an AIA for MCAS Miramar, Montgomery Gibbs Executive Airport, Brown Field, and Gillespie Airport is compatible with respect to airport related noise, public safety, airspace protection, and aircraft overflight areas.

8. Section 4.6.3.5 (b) on page 4-34 is revised as follows:

Chapter 13 Article 2, Division 15 establishes the Airport Land Use Compatibility Overlay Zone, which ensures that new development located within an AIA for MCAS Miramar, Montgomery Gibbs Executive Airport, Brown Field, and Gillespie Airport is compatible with respect to airport related noise, public safety, airspace protection, and aircraft overflight areas.

9. The second paragraph under Section 4.6.3.7 on page 4-35 is revised as follows:

Review Area 1 is defined by the combination of the 60 CNEL noise contour, the outer boundary of all safety zones, and the airspace surfaces. ~~Threshold Siting Surfaces.~~

10. The first paragraph under Section 4.7.2.4. on page 4-38 is revised as follows:

Updated City of San Diego Storm Water Standards (based on the Copermittees' Model BMP Design Manual) were adopted in October 2018. ~~on February 16, 2016.~~

11. Section 4.7.2.5 on page 4-39 is revised as follows:

This permit was adopted on April 1, 2014, and amended in 2015 and 2018. The 2018 amendments to the General Industrial Permit are scheduled to go into effect on July 1, 2020. ~~is scheduled to expire on June 30, 2020.~~

12. Section 4.7.4 on page 4-40 is revised as follows:

The City's Storm Water Standards Manual provides information to project applicants on how to comply with permanent and construction storm water quality requirements in the City. Significant elements of the Storm Water Standards Manual include: The Storm Water Standards Manual is separated into three separate manuals which are listed as follows:

1. ~~LID Best Management Practices Requirements;~~ Part 1: BMP Design Manual – For Permanent Site Design, Storm Water Treatment and Hydromodification Management;
2. ~~Source Control BMPs;~~ Part 2: Construction BMP Standards; and
3. ~~BMPs Applicable to Individual Priority Development Project Categories; and~~ Part 3: Offsite Storm Water Alternative Compliance Program For Water Quality and Hydromodification Control.
4. ~~Treatment Control BMPs.~~

Part 1 of the Storm Water Standards Manual addresses and provides guidance for complying with updated onsite post-construction storm water requirements for Standard Projects and Priority Development Projects (PDPs), and provides updated procedures for planning, preliminary design,

selection, and design of permanent storm water BMPs based on the performance standards in the Regional MS4 Permit. Part 2 of the Storm Water Standards Manual provides minimum requirements to prevent construction activities from adversely impacting downstream and onsite resources. Part 3 of the Storm Water Standards Manual addresses the City's Offsite Storm Water Alternative Compliance Program which allows the mitigation of PDP storm water impacts through implementation of offsite structural BMPs. Part 1 and Part 3 comply with the Regional MS4 Permit regulating post-construction storm water discharges onsite. Part 2 complies with the Regional MS4 Permit and the Construction General Permit regulating construction-phase storm water discharges. 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 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 is consistent with the Regional Best Management Practices Design Manual.

13. Section 4.9.2.3 on page 4-51 is revised as follows:

In addition to the policies and criteria addressing land use compatibilities, including building heights, and densities, and intensities, the ALUCPs contain policies and criteria concerning noise (in Section 3.3 of both of ALUCPs).

14. Section 4.12.1.2 on page 4-58 is revised as follows:

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-#13-02).

15. The first paragraph and corresponding sensitive species list under Section 5.2.4.1 on pages 5.2-4 through 5.2-6 are revised as follows:

Implementation of the proposed project has the potential to impact 3734 sensitive plant species known to occur, or programmatically determined to have a potential to occur in the CPU area (refer to Section 2.3.2.3 in this PEIR for additional details) and/or additional species in the future. Precise numbers and locations of sensitive plant species would be identified through project-level evaluations and surveys for

future development/redevelopment in accordance with the proposed project. Potential sensitive plant species identified thus far that could be impacted by implementation of the proposed project include:

- singlewhorl burrobrush (CNPS Rare Plant Rank 2B.2),
- San Diego ambrosia (CNPS Rare Plant Rank 1B.1, MSCP Covered),
- San Diego goldenstar (CNPS Rare Plant Rank 1B.1, MSCP Covered),
- Orcutt's brodiaea (CNPS Rare Plant Rank 1B.1, MSCP Covered),
- wart-stemmed ceanothus (CNPS Rare Plant Rank 2B.2),
- Orcutt's spineflower (Federally Endangered, State Endangered, CNPS Rare Plant Rank 1B.1),
- knotweed spineflower (Federal Species of Special Concern, CNPS Rare Plant Rank 1B.1),
- long-spined spineflower (CNPS Rare Plant Rank 1B.2),
- summer holly (CNPS Rare Plant Rank 1B.2),
- variegated dudleya (CNPS Rare Plant Rank 1B.2, MSCP Covered),
- San Diego button-celery (Federally Endangered, State Endangered, CNPS Rare Plant Rank 1B.1, MSCP/VPHCP Covered),
- San Diego barrel cactus (CNPS Rare Plant Rank 2B.1, MSCP Covered),
- decumbent goldenbush (CNPS Rare Plant Rank 1B.2),
- willow monardella (Federally Endangered, State Endangered, CNPS Rare Plant Rank 1B.1, MSCP Covered),
- spreading navarretia (Federally Threatened, CNPS Rare Plant Rank 1B.1, MSCP/VPHCP Covered)^[1],
- prostrate vernal pool navarretia (CNPS Rare Plant Rank 1B.1, VPHCP Covered),
- San Diego mesa mint (Federally Endangered, State Endangered, CNPS Rare Plant Rank 1B.1, MSCP/VPHCP Covered),
- Nuttall's scrub oak (CNPS Rare Plant Rank 1B.1),
- oil nest straw (CNPS Rare Plant Rank 1B.1)
- woven-spored lichen (CNPS Rare Plant Rank 3),
- San Diego thorn-mint (Federally Threatened, State Endangered, CNPS Rare Plant Rank 1B.1, MSCP Covered),
- California adolphia (CNPS Rare Plant Rank 2B.1),

- Coulter's saltbush (CNPS Rare Plant Rank 1B.2, MSCP Narrow Endemic and Covered),
- Otay Mountain ceanothus (CNPS Rare Plant Rank 1B.2),
- Palmer's goldenbush (CNPS Rare Plant Rank 1B.1),
- Palmer's grapplinghook (CNPS Rare Plant Rank 4.2),
- San Diego marsh elder (CNPS Rare Plant Rank 2B.2),
- Coulter's goldfields (CNPS Rare Plant Rank 1B.1),
- Robinson's pepper-grass (CNPS Rare Plant Rank 4.3),
- Little mousetail (CNPS Rare Plant Rank 3.1),
- California Orcutt grass (Federally Endangered, State Endangered, CNPS Rare Plant Rank 1B.1, Narrow Endemic, MSCP/VPHCP Covered),
- Otay mesa mint (Federally Endangered, State Endangered, CNPS Rare Plant Rank 1B.1, Narrow Endemic, MSCP/VPHCP Covered),
- Munz's sage (CNPS Rare Plant Rank 2B.2),~~and~~
- San Diego County viguiera (CNPS Rare Plant Rank 4.2),~~z~~
- Campbell's liverwort (CNPS Rare Plant Rank 1B.1),
- graceful tarplant (CNPS Rare Plant Rank 4.2), and
- ashy spikemoss (CNPS Rare Plant Rank 4.1).

16. Section 5.5.6 on page 5.5-13 is revised as follows:

5.5.6 Mitigation Framework

The 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. Mitigation Measure HIST 5.5-1 would be required for all development projects with the potential to impact significant historical resources, and Mitigation Measure HIST 5.5-2 would be required for all development projects with the potential to impact significant archaeological and tribal cultural resources. ~~The City's Historical Resources Guidelines (SDMC Chapter 14, Article 3, Division 2) include a number of requirements that would apply to future development evaluated under the proposed project that would ensure site-specific surveys are completed to verify the presence of resources. Additionally, the Historical Resources Guidelines would be followed in the event site-specific surveys are required as part of~~

the ministerial review process. Adherence to the Historical Resources Regulations and Guidelines would ensure that appropriate measures are applied to protect historical resources consistent with City requirements. Such requirements may include archaeological and Native American monitoring, avoidance and preservation of resources, data recovery and repatriation or curation of artifacts, among other requirements detailed in the Historical Resources Guidelines.

Even after application of the existing regulatory framework contained in the Historical Resources Guidelines and Historical Resources Regulations, the degree of future impacts and the applicability, feasibility, and success of future avoidance measures cannot be adequately known for each specific future project at this program level of analysis. Thus, potential impacts to historical, archaeological, or tribal cultural resources would be significant and unavoidable.

HIST 5.5-1: Historic Buildings, Structures, Objects, or Sites

Prior to issuance of any permit 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 meets any of the following criteria: (1) National Register-Listed or formally determined eligible, (2) California Register-Listed or formally determined eligible, (3) San Diego Register-Listed or formally determined eligible, or (4) meets the CEQA criteria for a historical resource. 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 and Historic Resources Regulations (SDMC sections 143.0201–143.0280).

The 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;
- Designing new construction that is compatible in size, scale, materials, color, and workmanship to the historic 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;
- Specific types of historical resource reports are required to document the methods (see Section III of the Historical Resources Guidelines) used to determine the presence or absence of historical resources, to identify potential impacts from a proposed development and evaluate the significance of any identified historical resources. If potentially significant impacts to an identified historical resource are identified, these reports shall also recommend appropriate mitigation to reduce the impacts to below a level of significance. If required, mitigation programs can also be included in the report.

HIST 5.5-2: Prehistoric and Historic Archaeological Resources, Sacred Sites, and Human Remains

Prior to issuance of any permit for a future development project implemented in accordance with the Community Plan Update that could directly affect an archaeological resource, the City shall require the following steps be taken to determine (1) the presence of archaeological resources and (2) the appropriate mitigation for any significant resources that may be impacted by a development activity. Sites may include residential and commercial properties, privies, trash pits, building foundations, and industrial features representing the contributions of people from diverse socioeconomic and ethnic backgrounds. Sites may also include resources associated with prehistoric Native American activities.

Initial Determination

The environmental analyst shall 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. A cultural resources sensitivity map was created from the record search data as a management tool to aid in the review of future projects within the CPU area which depict two levels of sensitivity (Figure 5.5-1). Review of this map shall be done at the initial planning stage of a specific project to ensure that cultural resources are avoided and/or impacts are minimized in accordance with the Historical Resources Guidelines. These levels, which are described below, are not part of any federal or State law.

- **High Sensitivity:** These areas contain known significant cultural resources and have a potential to yield information to address a number of research questions. These areas may have buried deposits, good stratigraphic integrity, and preserved surface and subsurface features. If a project were to impact these areas, a survey and testing program is required to further define resource boundaries subsurface presence or absence and determine level of significance. Mitigation measures such as a Research Design and Archaeological Data Recovery Plan (ADRP) and construction monitoring shall also be required.
- **Moderate Sensitivity:** These areas contain recorded cultural resources or have a potential for resources consisting of more site structure, diversity of feature types, and diversity of artifact types, or have a potential for resources to be encountered. The significance of cultural resources within these areas may be unknown. If a project impacts these areas, a site-specific records search, survey and significance evaluation is required, and if cultural resources were identified during the survey. Mitigation measures may also be required.
- **Low Sensitivity:** These are described as areas where there is a high level of disturbance due to existing development, with few or no previously recorded resources documented within the area or considered during tribal consultation. Resources at this level would not be expected to be complex, with little to no site structure or artifact diversity. If a project impacts these areas, a records search may be required. Areas with steep hillsides generally do not leave an archaeological signature and would not require further evaluation.

If there is any evidence that the project area contains archaeological or tribal cultural resources, then an archaeological evaluation consistent with the City's Guidelines shall be required. All individuals conducting any phase of the archaeological evaluation program shall meet professional qualifications in accordance with the City's Historical Resources Guidelines.

Step 1

Based on the results of the Initial Determination, if there is evidence that the site contains potential historical resources, 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 that includes a records search at the SCIC at San Diego State University. 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 descendant communities. The results of the background information would be included in the evaluation report.

Once the background research is complete, a field reconnaissance shall be conducted by individuals whose qualifications meet the standards outlined in the Historical Resources Guidelines. Consultants shall employ innovative survey techniques when conducting enhanced reconnaissance, including remote sensing, ground penetrating radar, human remains detection canines, LiDAR, and other soil resistivity techniques as determined on a case-by-case basis by the tribal representative during the project-specific AB 52 consultation process. Native American participation is required for field surveys when there is likelihood that the project site contains prehistoric archaeological resources or tribal cultural resources. If, through background research and field surveys, resources are identified, then an evaluation of significance based on the City's Guidelines must be performed by a qualified archaeologist.

Step 2

Where a recorded archaeological site or tribal cultural resource (as defined in the PRC) is identified, the City shall initiate consultation with identified California Indian tribes pursuant to the provisions in PRC 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 involved in making recommendations regarding the significance of a tribal cultural resource which also could be a prehistoric archaeological site. A testing program may be recommended which requires reevaluation of the proposed 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 of San Diego's Historical Resources Guidelines. Results of the consultation process will determine the nature and extent of any additional archaeological evaluation or changes to the proposed project. Results of the consultation process will determine the nature and extent of any additional archaeological evaluation or changes to the proposed project.

The results from the testing program shall be evaluated against the Significance Thresholds found in the Historical Resources Guidelines. If significant historical resources are identified within the area of potential effects, the site may be eligible for local designation. However, this process will 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. The final

testing report shall be submitted to Historical Resources Board (HRB) staff for designation. The final testing report and supporting documentation will be used by HRB staff in consultation with qualified City staff to ensure that adequate information is available to demonstrate eligibility for designation under the applicable criteria. This process shall be completed prior to distribution of any draft environmental document.

An agreement with each consulting tribe 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 State of California Department of Parks and Recreation (DPR) 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 indicate 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 archaeological 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 Archaeological Data Recovery Program (ADRP) 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 shall be reviewed and approved by the City's Environmental Analyst prior to distribution of any draft environmental 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 existing development or dense vegetation.

A Native American observer must be retained for all subsurface investigations on public or private property, including geotechnical testing and other ground-disturbing activities, whenever a Native American Traditional Cultural Property or any archaeological site would be impacted. In the event that human remains are encountered during data recovery and/or a monitoring program, the provisions of California Public Resources Code Section 5097 shall 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 5097.98) and State Health and Safety Code (Section 7050.5), and in the federal, State, and local regulations described above shall be undertaken. These provisions shall be outlined in the Mitigation Monitoring and Reporting Program (MMRP) included in the subsequent project-specific environmental document. The Native American monitor shall be consulted during the preparation of the written report, at which time he/she 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 Historical Resources 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 Historical Resources 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's Archaeological Resource Management Reports: Recommended Contents and Format (see Appendix C of the Historical Resources 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. 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 of San Diego. 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 shall be required in accordance with the project's Mitigation Monitoring and Reporting Program. The disposition of human remains and burial-related artifacts that cannot be avoided or are inadvertently discovered is governed by State (i.e., Assembly Bill 2641 [Coto] and California Native American Graves Protection [NAGPRA] and Repatriation Act of 2001 [Health and Safety Code 8010-8011]) and federal (i.e., federal NAGPRA [USC 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 Code of Federal Regulations Part 79. Additional information regarding curation is provided in Section II of the Historical Resources Guidelines.

5.5.7 Significance of Impacts after Mitigation

5.5.7.1 Historic Buildings, Structures, Objects, or Sites

Development implemented in accordance with the proposed project that could potentially impact significant historic buildings, structures, objects, or sites would be required to implement Mitigation Measure HIST 5.5-1, 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 policies in the General Plan 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 the applicability, feasibility, and success of future mitigation measures cannot be adequately known for each specific future project at this program level of analysis. Thus, potential impacts to historic buildings, structures, objects, or sites would be significant and unavoidable.

5.5.7.2 Prehistoric and Historic Archaeological Resources, Sacred Sites, and Human Remains

Development implemented in accordance with the proposed project that could potentially result in impacts to significant archaeological resources would be required to implement Mitigation Measure HIST 5.5-2 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 PRC 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 prehistoric or historical archaeological resources. However, even with application of the existing regulatory framework and mitigation framework, the degree of future impacts and the applicability, feasibility, and success of future mitigation measures cannot be adequately known for each specific future project at this program level of analysis. Thus, potential impacts to prehistoric and historic archaeological resources, sacred sites, and human remains would remain significant and unavoidable.

5.5.7.3 Tribal Cultural Resources

Development implemented in accordance with the proposed project that could potentially impact significant tribal cultural resources would be required to implement Mitigation Measure HIST 5.5-2 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 PRC 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, the degree of future impacts and the applicability, feasibility, and success of future mitigation measures cannot be adequately known for each specific future project at this program level of analysis. Thus, potential impacts to tribal cultural resources would remain significant and unavoidable.

17. The first paragraph on page 5.6-5 is revised as follows:

established by the ALUCPs, as well as associated FAA, City, and Department of Defense/Department of the Navy requirements. Consistency with ALUCP requirements would be reviewed on a project by-project basis and compliance with these requirements would avoid future significant safety impacts associated with ALUCP safety zones and airspace protection. Development under the proposed project would also be subject to SDMC regulations that reduce dust, vapor, smoke, and electromagnetic interference through limits for glare, air contaminants, electrical/radio activity, and outdoor lighting (SDMC Chapter 14, Article 2, Division 7). In addition, the proposed CPU contains policies to ensure that future uses are compatible with the safety zones and airspace protection surfaces for the airports (Policy ~~LU 1.24~~ 1.27) and development would be reviewed for consistency with adopted airport policies (Policy ~~LU 1.25~~ 1.28). As such, implementation of the project would not expose people or structures to a significant risk of loss, injury, or death, from off-airport aircraft operational accidents. Impacts would be less than significant.

18. The first paragraph on page 5.6-6 is revised as follows:

with these requirements and implementation of the proposed CPU policy that requires future projects to be reviewed for compatibility with the safety zones, noise contours, and airspace protection surfaces identified in the applicable ALUCPs (Policy ~~LU 1.24~~ 1.27), potential hazards from airport operations would not expose people or structures to a significant risk of loss, injury, or death, from off-airport aircraft operational accidents. Therefore, impacts would be less than significant.

19. The fourth paragraph under Section 5.7.4.1 on page 5.7-2 is revised as follows:

In addition, ~~the Urban Design section of the proposed CPU contains policies UD 5.32, 5.33, and 5.34 and 5.36~~ that encourage the incorporation of sustainable design elements into public rights-of-way areas for storm water capture and infiltration to reduce storm water runoff, peak flows, and flooding.

20. The first paragraph under Section 5.7.4.2 on page 5.7-3 is revised as follows:

~~Two~~ Three other small pockets occur in the CPU area that are mapped 100-year floodplains, including the very northwest corner of the CPU area at the SR 52/I-805 interchange, ~~and a small area north of Balboa Avenue and south of Viewridge Avenue, and the southwest corner of the CPU area between I-805 and Kearny Villa Road.~~

21. The second paragraph under Section 5.7.4.2 on page 5.7-3 is revised as follows:

While most of these floodplain areas are proposed to be designated Open Space by the proposed CPU, some occur within land proposed to be designated Community Commercial, Industrial, and Technology Park.

22. The first paragraph under the “Airport Land Use Compatibility Overlay Zone Regulations” section on page 5.8-8 is revised as follows:

The Overlay Zone is intended to ensure that new development located within an AIA is compatible with respect to airport-related noise, public safety, airspace protection, and aircraft overflight areas.

23. The first paragraph on page 5.8-6 is revised as follows:

guide compatible land uses and incorporate noise attenuation measures for new uses to protect people living and working in the City from an excessive noise environment. One of the goals of the Public Facilities, Services, and Safety section of the proposed CPU is to provide a safe and livable environment by reducing and avoiding risks posed by noise, geologic, seismic, and hazardous materials conditions. The CPU identifies the airports (Montgomery-Gibbs Executive Airport and MCAS Miramar), freeways, and roads as primary noise sources in Kearny Mesa. The proposed CPU contains land use policies to minimize conflicts (including noise impacts) between uses through building design (Policies ~~LU~~ 1.18, ~~and~~ 1.19, ~~and~~ 1.24), and by protecting industrial lands through appropriate buffers (Policy LU 1.19). Public Facilities Policy ~~PF~~ 7.14 encourages site planning, design and construction, operational measures, and on-site noise level limit practices that minimize noise, especially for and within mixed uses. The applicable policies contained in the proposed CPU would serve to guide development in the CPU area through the placement of compatible land uses, use of buffering and site design to minimize impacts on adjacent properties, and incorporation of noise attenuation measures into new development. Adherence to CPU and General Plan policies that encourage noise reduction practices, such as daytime deliveries, noise level limits, and preconstruction disclosures of potential noise problems, in addition to compliance with the requirements of the SDMC would help achieve the General Plan Noise Element’s goal of protecting people living and working in the City from an excessive noise environment. Noise impacts associated with the proposed project are discussed in Section 5.9, Noise, of this PEIR. The proposed CPU would be consistent with the goals and policies of the General Plan Noise Element.

24. The “Historic Preservation Element” section on page 5.8-6 is revised as follows:

The purpose of the General Plan Historic Preservation Element is to guide the preservation, protection, restoration, and rehabilitation of historical and cultural resources throughout the City. The purpose of the General Plan Historic Preservation Element is also to improve the quality of the built environment, encourage appreciation for the City’s history and culture, maintain the character and identity of communities, and contribute to the City’s economic vitality through historic preservation. The goal of the Historic Preservation section of the proposed CPU is to identify and preserve the significant historical, archaeological, and tribal cultural resources in the Kearny Mesa community. The proposed CPU contains Historic Preservation policies to promote the identification, evaluation, and preservation of significant historical resources in the community (Policies HP 3.1 through 3.89), consistent with the goals of the General Plan Historic Preservation Element. Impacts associated with historical, archaeological, and tribal cultural resources are discussed in Section 5.5, Historical, Archaeological, and Tribal Cultural Resources, of this PEIR. The CPU’s historic preservation goals and policies and consistent with and implement the goals of the General Plan Historic Preservation Element.

25. The “Airport Land Use Compatibility Overlay Zone Regulations” section on page 5.8-8 is revised as follows:

The purpose of the Airport Land Use Compatibility Overlay Zone is to implement adopted Airport Land Use Compatibility Plans as applicable to property within the City. The Overlay Zone is intended to ensure that

new development located within an AIA is compatible with respect to airport-related noise, public safety, airspace protection, and aircraft overflight areas. This overlay zone applies to properties that are located within an AIA as identified in an adopted ALUCP. Portions of the CPU area are located within the AIAs for Montgomery-Gibbs Executive Airport and MCAS Miramar; thus, the Airport Land Use Compatibility Overlay Zone regulations would apply to new development in those areas. The CPU contains two land use policies regarding the Airport Land Use Compatibility Overlay Zone. Policy ~~1.27 and 1.28~~^{LU 1.24 and 1.25} to ensure projects are reviewed for compatibility with the safety zones, noise contours, and airspace protection surfaces identified in the Airport Land Use Compatibility Overlay Zone of the San Diego Municipal Code for the Montgomery-Gibbs Executive Airport and MCAS Miramar. Through adherence to the City's Airport Land Use Compatibility Overlay Zone Regulations, impacts associated with consistency with the Airport Land Use Compatibility Overlay Zone Regulations would be less than significant.

26. The third paragraph on page 5.8-14 is revised as follows:

The City implements the overflight policies of the ALUCPs with the Airport Land Use Compatibly Overlay Zone. Zoning actions to apply the Airport Land Use Compatibility Overlay Zone constitute property owner notification of aircraft overflight in accordance with adopted ALUCPs.

~~For portions of the CPU area within the overflight notification area for Montgomery-Gibbs Executive Airport and/or MCAS Miramar, an overflight notification agreement must be recorded with the Office of the County Recorder for any new dwelling unit. The recordation of an overflight notification agreement is not necessary where the dedication of an avigation easement is required. Alternative methods of providing overflight notification are acceptable if approved by the ALUC. Future development within the CPU area would be subject to compliance with these requirements.~~

27. The second paragraph on page 5.9-17 is revised as follows:

Policy ~~LU 1.214~~ of the proposed CPU includes site design strategies and noise reduction measures for new development within 500 feet of freeways. Additionally, policies in the General Plan Noise Element, such as policies NE-A.2, NE-A.3, and NE-B.1, require the reduction of traffic noise exposure because they set standards for the siting of sensitive land uses, while Title 24 of the CBC requires that multi-family residential development projects must demonstrate that interior noise levels would be reduced to acceptable levels (45 CNEL or less) through submission and approval of a Title 24 Compliance Report. General Plan Noise Element policy NE-A.4 requires an acoustical study consistent with the 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 City's Land Use – Noise Compatibility Guidelines. However, as new development projects could place sensitive receptors in locations where the exterior noise levels exceed the Land Use – Noise Compatibility Guidelines, exterior noise impacts would remain significant and unavoidable and there are no feasible mitigation measures available.

28. The fourth paragraph on page 5.11-3 is revised as follows:

CPU policies ~~UD 5.32, 5.33, and 5.34~~^{UD 5.32, 5.33, and 5.34} and ~~UD 5.36~~ encourage the incorporation of "green" infrastructure as part of future projects to increase pervious areas and improve the existing management of runoff for sites within the CPU area.

29. Section 6.7 on page 6-5 is revised as follows:

However, all future development within the CPU area and surrounding communities within the City of San Diego's boundaries would be required to comply with applicable 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.

30. The fourth paragraph on page 7-5 is revised as follows:

In addition to the energy efficiencies that would be realized from compliance with CALGreen and Title 24 standards in new developments, the proposed CPU includes sustainable design goals and policies that support energy-efficient and renewable energy sources and systems in future development, as well as installation of energy-efficient lighting and electrical vehicle charging stations within village areas (Policies ~~PF 1.6, 4.5, 4.40, and 7.16 through 7.19~~, ~~7.15 through PF 7.18~~; ~~Urban Design section Goal 5-3; and Public Facilities, Services, and Safety section Goal 7-2~~). There are no features of the proposed project that would support the use of excessive amounts of energy or would create unnecessary energy waste. Impacts would be less than significant.

31. The first paragraph on page 7-6 is revised as follows:

Furthermore, energy efficiencies associated with future development within the CPU area would be realized from compliance with CALGreen and Title 24 standards. The proposed CPU also includes sustainable design goals policies that support energy-efficient and renewable energy sources and systems in future development, as well as installation of energy-efficient lighting and electrical vehicle charging stations within village areas (Policies ~~1.6, 4.5, 4.40, and 7-16 through 7.19~~, ~~PF 7.15 through PF 7.18~~; ~~Urban Design section Goal 5-3; and Public Facilities, Services, and Safety section Goal 7-2~~). Impacts would be less than significant.

32. The sixth paragraph on page 8-3 is revised as follows:

The ALUCPs outline additional land use and development restrictions, such as density, intensity, and height that would apply under all alternatives.

3.2 Revisions to the Draft PEIR Appendices

3.2.1 Revisions to Appendix C: Biological Resources Report

The following revisions have been made:

1. The second paragraph on page 14 is revised as follows:

A search of CNPS and CNDDDB records (two-mile radius from the KMCPU area) was used to develop a matrix of additional sensitive plant species that may have potential to occur in the KMCPU area due to the presence of suitable habitat (e.g., vegetation communities, soils, elevation, and geographic range, life form/blooming period, etc.). The matrix is presented in Table 2 and includes 14 additional special status plant species, their favorable habitat conditions, and their potential to occur in the KMCPU area. During the public review period of the draft PEIR an additional three sensitive plant species were identified as having the potential to occur in the CPU area. These three species include: Campbell's liverwort (*Geothallus tuberosus*, CNPS Rare Plant Rank 1B.1), graceful tarplant (*Holocarpha virgata ssp. elongata*, CNPS Rare Plant Rank 4.2), and ashy spikemoss (*Selaginella cinerescens*, CNPS Rare Plant Rank 4.1).

3.2.2 Revisions to Appendix I: Hydrology and Water Quality Report

The following revisions have been made:

1. Page i is revised as follows:

HYDROLOGY AND WATER QUALITY REPORT

IN SUPPORT OF THE PROGRAM ENVIRONMENTAL IMPACT REPORT FOR

KEARNY MESA COMMUNITY PLAN UPDATE

2. The first paragraph under Section 2.2, Floodplains, on page 2 is revised as follows:

Federal Emergency Management Agency (FEMA) studies that included the Kearny Mesa area have documented existing flood risks. Kearny Mesa has been studied and documented by the Federal Emergency Management Agency (FEMA). An exhibit showing FEMA Flood Zones and copies of FIRMettes, which show portions of the Flood Insurance Rate Maps (FIRM) Panels that include the Kearny Mesa Community, are included in Attachment C.

3. The bulleted listed under Section 3.2, Receiving Waters, on page 4 is revised as follows:

- 906.40: Penasquitos Hydrologic Unit (906), Miramar Hydrologic Area (.4). Rose Creek is in this hydrologic basin planning area.
- 906.50: Penasquitos Hydrologic Unit (906), Tecolote Hydrologic Area (.5). Tecolote Creek is in this hydrologic basin planning area.
- 907.11: San Diego Hydrologic Unit (907), Lower San Diego Hydrologic Area (.1). Mission San Diego Hydrologic Sub Area (.11). Murphy Canyon Creek and the Lower San Diego River are ~~is~~ in this hydrologic basin planning area.
- ~~907.11: San Diego Hydrologic Unit (907), Lower San Diego Hydrologic Area (.1), Mission San Diego Hydrologic Sub Area (.11). The Lower San Diego River is in this hydrologic basin planning area.~~

4. The third paragraph on page 6 is revised as follows:

~~Numerous studies of receiving water quality and sediment quality in San Diego Bay have been performed by several agencies, and the studies have found that beneficial uses are impacted by the existing water quality conditions. As a result the receiving waters have been listed for several pollutants and TMDLs are in place or in progress.~~ The 2014 and 2016 California Integrated Report Clean Water Act Section 303(d) and 305(b), dated October 3, 2017 is the most current adopted report lists the impaired waters requiring TMDLs. Excerpts from the list pertaining to the receiving water for Kearney Mesa are included in Attachment D.

5. The fourth and fifth paragraph on page 9 are revised as follows:

SWRCB Order No. 2009-0009-DWQ NPDES General Permit No. CAS000002 Waste Discharge Requirements (WDRs) for Discharges of Storm Water Runoff Associated with Construction Activity (General Construction Permit), was adopted by the SWRCB on September 2, 2009. The permit was ~~previously~~ amended by Order No. 2010-0014-DWQ and then again by Order No. 2012-0006-DWQ. The General Construction Permit is

due to be reissued. This permit may be reissued several times during the life of the Kearny Mesa Community Plan.

During the construction phase, any development project that is 1 acre or greater in size, or that is less than 1 acre in size but is part of a larger common plan of development, will be subject to the requirements of the General Construction Permit, or a future SWRCB Order re-issuing the General Construction Permit. ~~The General Construction Permit was adopted by the SWRCB on September 2, 2009, and is due to be reissued. The permit was amended by Order No. 2010-0014-DWQ and then again by Order No. 2012-0006-DWQ.~~ For coverage by the General Construction Permit, the project owner is required to submit to the SWRCB a Notice of Intent (NOI) to comply with the General Construction Permit, and develop and implement a Storm Water Pollution Prevention Plan (SWPPP) describing best management practices (BMPs) to be used during and after construction to prevent the discharge of sediment and other pollutants in storm water runoff from the project.

6. The Regional Municipal Separate Storm Sewer System (MS4) Permit subsection on pages 10 and 11 is revised as follows:

SDRWQCB regulates discharges from municipal separate storm sewer systems (MS4s) in the San Diego Region under the Regional MS4 Permit. The Regional MS4 Permit covers the City of San Diego and other municipal government and special district entities (referred to jointly as Copermittees) located in San Diego County, southern Orange County, and southwestern Riverside County who own and operate large MS4s which discharge storm water (wet weather) runoff and non-storm water (dry weather) runoff to surface waters throughout the San Diego Region. The Regional MS4 Permit, Order No. R9-2013-0001, was adopted on May 8, 2013 and has been twice amended (Order No. R9-2015-0001 and Order No. R9-2015-0100). The SDRWQCB has begun the development of proposed changes to the Regional MS4 Permit. The Regional MS4 Permit expired on June 27, 2018, but remains in effect under an administrative extension until it is reissued by the SDRWQCB, expected in late 2019.

The most recent permit, required the City of San Diego and the other ~~Copermittees~~ 20 municipal agencies in San Diego County to prepare both jurisdictional and watershed scale plans that detail how they will comply with the new requirements. The City updated its Jurisdictional Runoff Management Plan (JRMP) in 2016, with minor modifications made in 2018 and 2019, January 2018 and has participated in the development of Water Quality Improvement Plans (WQIP) for six Watershed Management Areas (WMA). The WQIPs that apply to the Kearny Mesa Community include, the San Diego River WQIP and the Mission Bay WQIP ~~Mission Bay / La Jolla~~.

The San Diego River WQIP was adopted in 2016 with the purpose of guiding the Participating Agencies' jurisdictional programs to achieve goals associated with improved water quality in the San Diego River WMA. The highest priority water quality condition was identified as Bacteria and goals and strategies were developed by each Participating Agency to reduce Bacteria and other pollutant loading. The City's goals include meeting numeric targets for dry weather and wet weather bacteria loading, ~~as well as implement green infrastructure features on all suitable City projects.~~

The Mission Bay ~~/La Jolla~~ WQIP was adopted in 2016 with the purpose of guiding the ~~Participating Agencies' jurisdictional~~ City's programs to achieve goals associated with improved water quality in the Mission Bay ~~/La Jolla~~ WMA. ~~The highest priority water quality condition was identified as high bacteria levels in creeks, bacteria accumulations at beaches, and erosion and sediment in Area of Special Biological Significance near La Jolla. The highest priority water quality conditions are bacteria in Tecolote Creek, sediment in the La Jolla Area of Special Biological Significance 29, and bacteria along the Pacific Ocean shoreline. Goals and~~

strategies were developed by each Participating Agency to reduce Bacteria and other pollutant loading. The City's goals include preventing further degradation of water quality within the watershed ~~water shed~~ to protect creeks and beaches from pollution and reducing bacteria levels in Tecolote Creek.

7. The third paragraph on page 12 is revised as follows:

Industrial facilities are subject to the requirements of State Water Resources Control Board Water Quality Order No. 2014-0057-DWQ NPDES Permit No. CAS000001, "Waste Discharge Requirements for Discharges of Storm Water Associated With Industrial Activities Excluding Construction Activities," (General Industrial Permit). This permit was adopted on April 1, 2014, and amended in 2015 and 2018, with the 2018 revisions due to go into effect on July 1, 2020, and will expire on June 30, 2020. This permit currently applies to operation of existing industrial facilities associated with ten broad categories of industrial activities, and will apply to operation of proposed new industrial facilities within those ten categories. The General Industrial Permit requires the implementation of storm water management measures and development of a SWPPP.

8. The third and fourth paragraphs on page 14 are revised as follows:

Average daily traffic is one factor in the amount of pollution generated from roadways. However, there are many other variables that may affect pollutant concentrations from roadways, including curbs, barriers, grass shoulders, landscaping, traffic characteristics such as speed and braking, vehicle characteristics such as age and maintenance, road maintenance practices, societal practices (i.e. – littering), and pavement composition and quality. Compliance with the requirements of the City's SWSM and effective implementation of storm water BMPs would avoid significant adverse water quality impacts associated with future development in the CPU area. Where appropriate, more specific drainage analyses will be completed in association with the City's SWSM requirements. ~~The City of San Diego's requirements for storm water BMPs for streets will be implemented on any project, and the resulting improvements compared to the existing condition with no storm water BMPs can be expected to be greater.~~

~~Adherence to the requirements of the City of San Diego's SWSM can be expected to improve water quality conditions, or at a minimum, to not exacerbate existing water quality impairments.~~

9. Section 6.0, Recommendations, is revised as follows:

The City of San Diego's ~~is currently developing a new~~ Municipal Waterways Maintenance Plan ~~which will~~ provides instruction on the maintenance of existing storm drain infrastructure ~~upon the expiration of the City's current Master Storm Water Systems Maintenance Program (MSWSMP).~~ Future developments adhering to the proposed community plan update should incorporate recommendations from the Municipal Waterways Maintenance Plan working plan in an effort to minimize flood risks within the existing waterways in the Kearny Mesa area.

Future specific development projects adhering to the proposed community plan update have the potential to impact pollutant discharges. Each development will be required to conduct a site-specific Storm Water Quality Management Plan (SWQMP) in accordance with the City of San Diego SWSM. Compliance with the requirements of the City's SWSM and effective implementation of storm water BMPs would avoid significant adverse water quality impacts associated with future development in the CPU area. ~~Future developments compliance with City SWQMP Standards are expected to result in improved water quality conditions with non-exacerbated water quality impairments being a minimum improvement.~~

3.2.3 Revisions to Appendix M: Transportation Impact Study

The following revisions have been made:

1. Table 2-1, Land Use Summary, on page 5 is revised as follows:

Table 2.1 Land Use Summary

Land Use ¹	2012 Base Year	2050 Adopted Plan	2050 Proposed Project
Dwelling Units	2,857	5,882	25,826
<u>Commercial</u> Retail + Visitor <u>Retail</u> (sf ²)	7,815,123	9,677,820	12,953,174
Office (sf)	11,654,234	13,537,017	20,713,682
Industrial (sf)	11,865,171	16,865,661	19,089,750
Institutional + Education (sf)	3,583,855	4,808,397	4,638,427

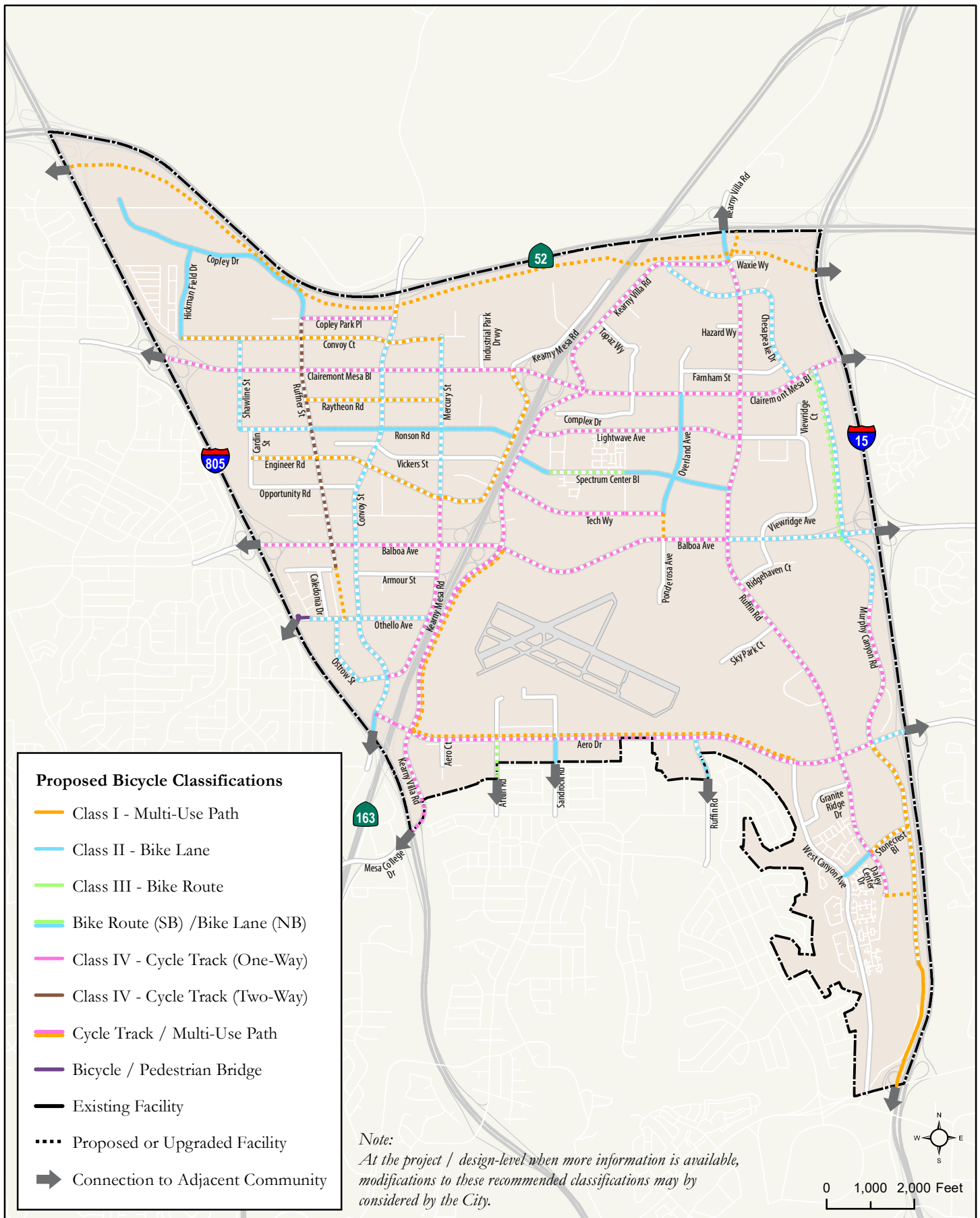
Source: City of San Diego (2019)

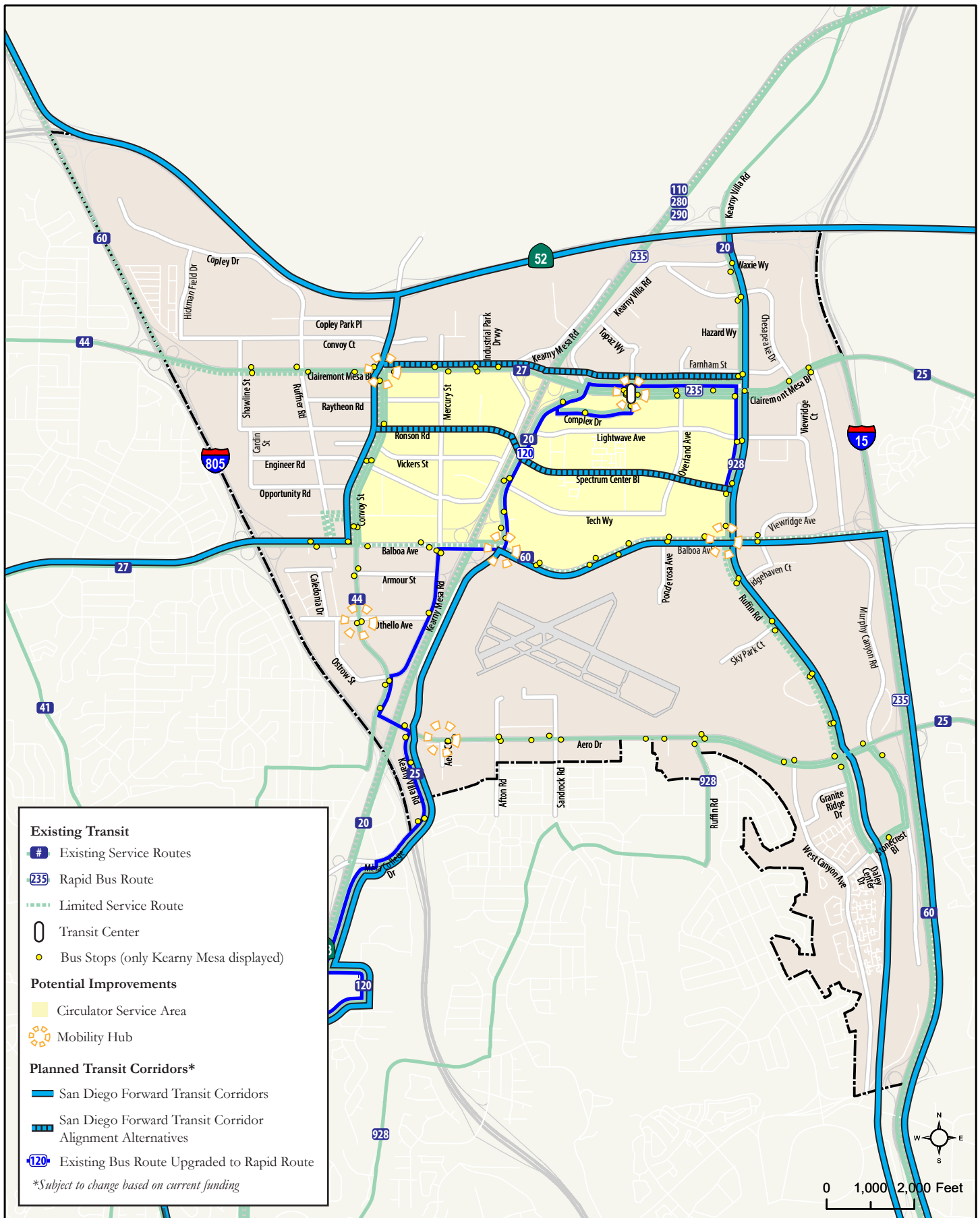
Notes:

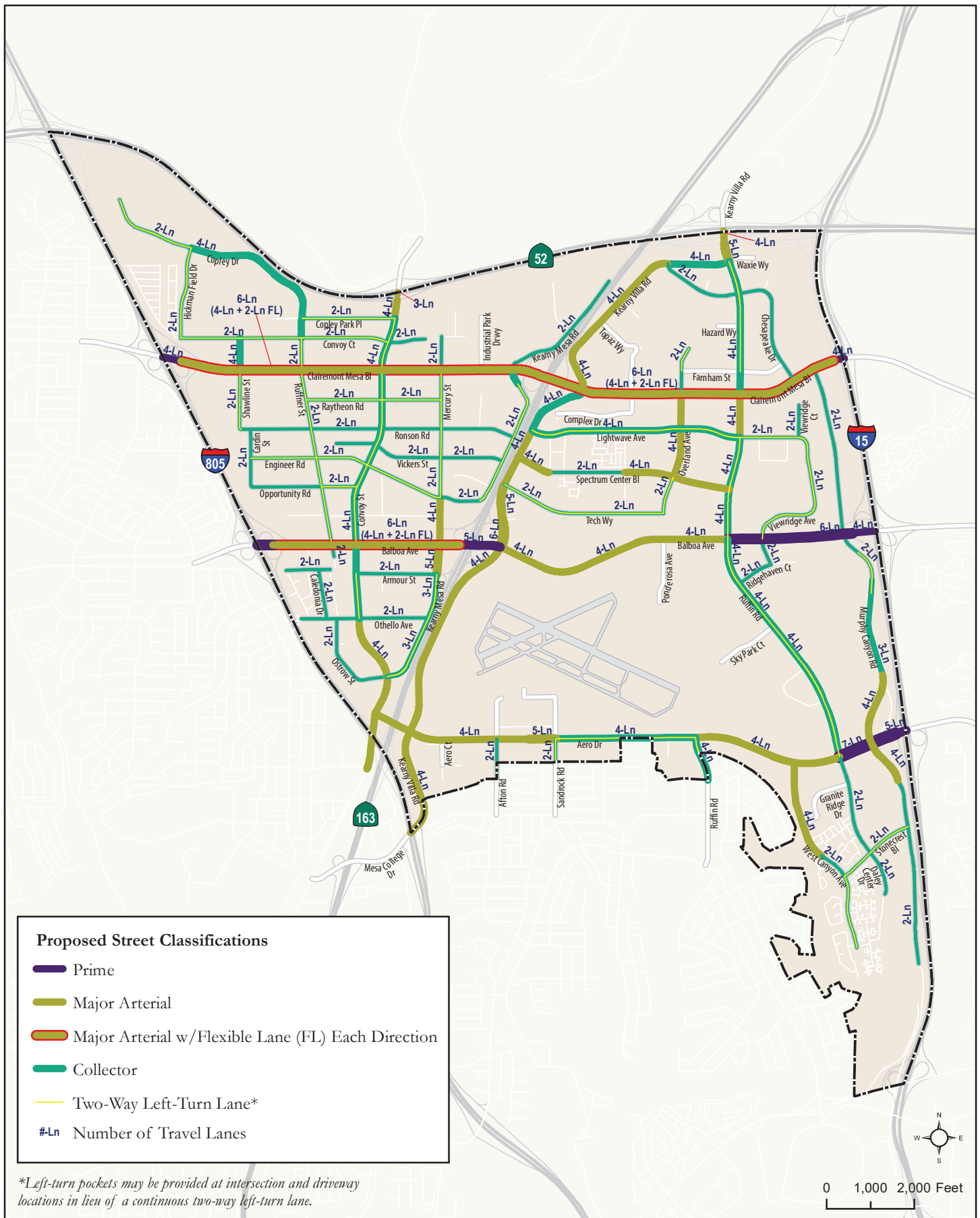
¹ Land uses provided in this summary table reflect the primary vehicular traffic generating uses in the community. Land uses not included in this table include parks and recreational uses, open space, transportation/utilities (e.g. airport runways, transit stop facilities, etc.), and vacant areas.

² sf = square feet

2. Figure 4-1 (Pedestrian Route Types – Proposed Project Conditions), Figure 4-2 (Bicycle Network – Proposed Project Conditions), Figure 4-3 (Transit Coverage – Proposed Project Conditions), and Figure 4-4 (Roadway Classifications – Proposed Project Conditions) are revised as follows:







3. Section 5.0, Vehicle Miles Traveled for GHG Analysis Purposes, on page 36 is revised as follows:

To more accurately describe the vehicle miles traveled (VMT) attributable to a smaller geography, such as a community planning area, it is necessary to track the trips and distances to and from the community that goes beyond the boundary of the geography. As shown with previous metrics, the ABM has this capability by designating the Kearny Mesa community as a *select zone*. This is further described in Appendix A.

By selecting Kearny Mesa as a *select zone*, any vehicle-based trip that has an origin, destination, or both in the community are tracked and all of the VMT of these trips are aggregated as the *select zone VMT* for Kearny Mesa. Appendix A further describes this analytical approach and resulting VMT, which can further then be applied to a calculation of transportation emissions. ~~is further described in Appendix A. Table 5.1 presents the VMT for greenhouse gas (GHG) emissions analysis for the Kearny Mesa community. As shown, the Proposed Project scenario's VMT is greater than both the Base Year and Adopted Plan scenarios. This is a result of the increased residential and employment land uses.~~

The select zone VMT includes all the VMT from any trip that originates or ends in that select zone. However, for External-to-Internal (E-I) or Internal-to-External (I-E) trips that only have one trip end in the select zone, it is not entirely accurate to attribute that entire trip length to the community as it originated or ended elsewhere, whereas all of the Internal-to-Internal (I-I) trip lengths are included in select zone. The International Council for Local Environment Initiatives (ICLEI) method was developed to appropriately calculate the VMT attributable to the community for GHG purposes. Essentially the equation is as follows:

$$\text{ICLEI VMT} = 100\% (\text{I-I VMT}) + 50\% (\text{E-I, I-E VMT})$$

Table 5.1 presents the VMT for greenhouse gas (GHG) emissions analysis using the ICLEI method for the Kearny Mesa community. As shown, the Proposed Project scenario's VMT is greater than both the Base Year and Adopted Plan scenarios. This is a result of the increased residential and employment land uses. As shown, specifically, the Proposed Project's VMT would be 49.3% greater than the Base Year and 31.6% greater than the Adopted Plan for the Kearny Mesa community using the ICLEI method. This is a result of the increased residential and employment land uses.

4. Table 5.3, Kearny Mesa Vehicle Miles Traveled for GHG Analysis Per Service Population, is revised as follows:

Table 5.3 Kearny Mesa Vehicle Miles Traveled for GHG Analysis Per Service Population

Kearny Mesa	2012 Base Year (BY)	2050 Adopted Plan (ACP)	2050 Proposed Project (CPU)	% Change		
				ACP vs. BY	CPU vs. BY	CPU vs. ACP
ICLEI VMT per Service Population	<u>26.627</u>	<u>2928.6</u>	<u>22.5</u>	7.64%	-15.3%	-21.3%

Source: SANDAG and Chen Ryan Associates (2019)

5. Appendix A, Vehicle Miles Travelled Calculation Using the SANDAG Regional Travel Demand Model – Technical White Paper is revised as follows:

Appendix A Vehicle Miles Traveled Calculation Using the SANDAG Regional Travel Demand Model – Technical White Paper



TECHNICAL WHITE PAPER

VEHICLE MILES TRAVELED CALCULATIONS USING THE SANDAG REGIONAL TRAVEL DEMAND MODEL

San Diego, California
May 2013

INSTITUTE OF TRANSPORTATION ENGINEERS (ITE) WHITE PAPER MANAGEMENT

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TECHNICAL WHITE PAPER

VEHICLE MILES TRAVELED CALCULATIONS USING THE SANDAG REGIONAL TRAVEL DEMAND MODEL

San Diego, California
May 2013

1.0 INTRODUCTION

In the last six years, the State of California has adopted key legislative bills that address the reduction of greenhouse gas (GHG) emissions. Specifically, Assembly Bill 32 (AB 32, 2006) sets a statewide GHG reduction target to return to the 1990 emissions level by the year 2020. In addition, in 2008, California adopted SB 375 which specifically addresses emissions from transportation. SB 375 directs California's Metropolitan Planning Organizations (MPO's) to meet GHG emission reduction targets established by the California Air Resources Board (CARB) through coordinated land use and transportation planning. Subsequently, Senate Bill 97 (SB 97, 2009) created guidelines for analyzing GHG emissions in environmental documents required under the California Environmental Quality Act (CEQA). For the purpose of this white paper, Vehicle Miles of Travel (VMT) are used as a proxy for greenhouse gases.

The Bureau of Transportation Statistics defines VMT as a unit to measure vehicular travel made by individual vehicles. Each mile traveled is counted as one vehicle mile regardless of the number of persons in the vehicle. Total vehicle miles is the aggregated total mileage traveled by all individual vehicles.

As a result of these acts, regional agencies, local governments, and private firms have worked to establish methodologies for analyzing the effects of development projects, climate action plans, and proposed general plan updates on GHG emissions as part of the CEQA process.

At the national-level, the International Council for Local Environmental Initiatives (ICLEI)-Local Governments for Sustainability has recently published a technical paper documenting a new national standard that establishes requirements and recommended best practices for developing local community GHG emissions inventory titled the "U.S. Community Protocol for Accounting and Reporting GHG Emissions (Community Protocol)"¹. The recommended method presented in this document recognizes that local governments possess the authority to influence GHG emissions from passenger vehicle trips both inside and outside of a community's geographic boundaries. This method also recognizes that local governments cannot influence all passenger vehicle GHG emissions within their boundaries. As such, the recommended origin-destination method (using a travel demand-based model) better captures a local government's ability to affect passenger vehicle emissions than the previous method of using average trip lengths to calculate in-boundary emissions.

¹ ICLEI-Local Governments for Sustainability US Community Protocol V1, October 2012. Appendix D: Transportation and Other Mobile Emission Activities and Sources. <http://www.icleiusa.org>

The approach recommended by this national document discusses why it is important to determine VMT calculations using a large area such as a community's geographic boundaries. One reason to focus on community-wide boundaries is because a high proportion of pass-through traffic can occur in smaller study areas that are outside that area's influence. An example is an Interstate highway that passes through a small city. Another reason is that a low proportion of vehicle miles from trips that terminate or originate in a small study area occur outside the area's geographic boundaries and would be more accurately identified in an expanded community-wide study area.

The ICLEI-recommended method for calculating VMT is to use model data of all travel originating or terminating within the jurisdictional boundaries of a community. Trip tables from either a traditional 4-step travel demand model (trip-based) or from an activity-based travel demand model (tour-based) are required to calculate and extract disaggregated VMT data in this manner.

Congruent with the methodology presented by ICLEI, the SB 375 Regional Targets Advisory Committee, in their September 2009 report to the CARB, recommended the following method for allocating VMT to a study area for the purposes of a GHG analysis:

- Internal-Internal: all VMT should be included in the analysis
- Internal-External or External-Internal: 50% of VMT should be included in the analysis
- External-External: all VMT should be excluded in the analysis

Following these recommended methods of allocation, this white paper describes the analytical approach for disaggregating VMT into these categories using a suite of existing tools. The resulting study area VMT can then be applied to a calculation of transportation emissions for a GHG analysis of the study area.

A glossary of acronyms and terms is provided in *Appendix A*.

2.0 METHODOLOGY

To date, the methodologies that have been developed focus on specific land uses as well as incorporation of average trip lengths (ATL). The methodology outlined in this paper switches the focus to trip ends (Origin and Destination patterns) with the intent of removing the uncertainty and potential for error in using average trip lengths, as recommended at both the state and national level.

This section of the white paper presents a methodology that utilizes existing tools for VMT and GHG analysis. The three main tools required for the analysis include:

1. A travel demand model
2. A Geographic Information System (GIS)
3. A spread sheet

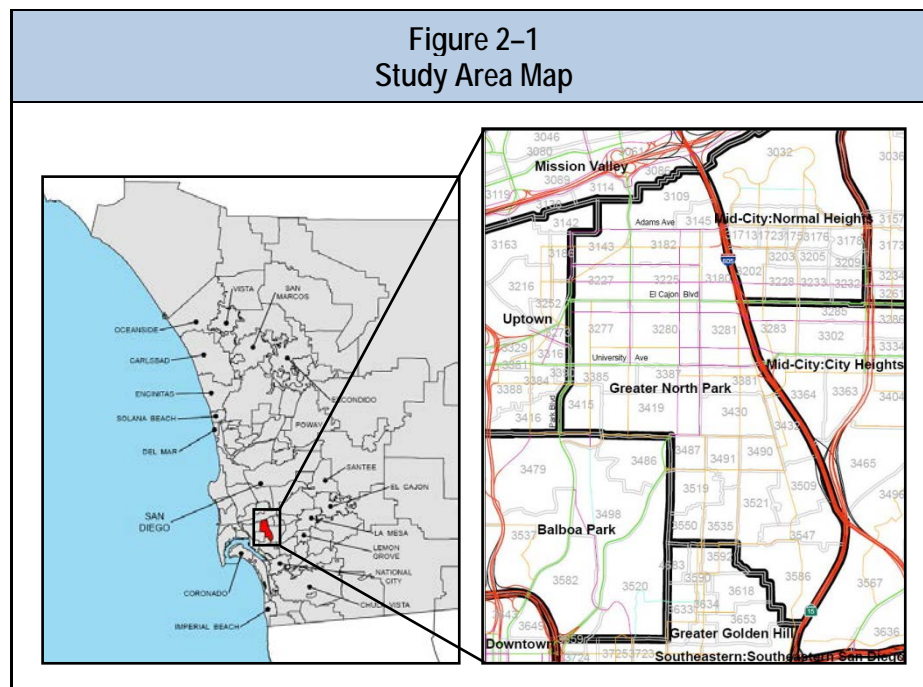
Note that this method can be applied using any travel demand model software, a GIS that is capable of producing spatial overlays, and any spread sheet software.

This methodology is intended to be used to analyze whole cities, communities within a large city and/or large-scale developments. The analysis area should include multiple Traffic Analysis Zones (TAZs).

The first step in the process is to define a study area. It should be noted that the size and shape of the study area can affect the analysis, as mentioned in the ICLEI protocol. For example, the larger the study area (community-wide) and the more homogeneous the study area shape, the more Internal-to-Internal trips and VMT will be captured. Conversely, smaller study areas with odd and/or linear shapes tend to have less Internal-to-Internal trip and VMT capture. Therefore it is recommended that a small or linear study area be expanded to a more homogenous study area size and shape, and that a normalized metric of VMT per acre be included in the analysis.

CASE STUDY: THE COMMUNITY OF GREATER NORTH PARK

The community of North Park was chosen as a test study area for this paper. North Park, depicted in **Figure 2-1**, is located in the central part of the City of San Diego and is defined by the City as a Community Plan Area (CPA). The community of North Park is bound by the other CPAs of Uptown and Balboa Park to the West, Golden Hill to the South, City Heights and Normal Heights to the East and Mission Valley to the North. The community boundary to the east is defined by the freeways I-15 and I-805, and defined by Park Blvd to the west. North Park is subdivided into 27 TAZs, and none of those TAZs overlap into adjacent community plan areas.



Alternatives analysis is a term used to describe the process of incrementally comparing one scenario to another, and travel demand models are one example of a tool used in the planning practice for comparing alternatives. **Figure 2-2** shows the four travel demand model land use and network alternatives that were created in support of this white paper:

Figure 2-2 Travel Demand Model Alternatives		
ALTERNATIVE	LAND USE	NETWORK
2008	Existing	Existing
2050 A	Adopted General Plan	Adopted Circulation Element
2050 B	Proposed Project	Adopted Circulation Element
2050 C	Proposed Project	Proposed Network Enhancement

The base year scenario was created to ensure consistency throughout the analysis and provides a bench mark for current conditions. The 2050 scenarios were created using SANDAG's "Series 12" Growth Forecast and Travel Demand Model. The three 2050 scenarios are based on the 2050 Revenue Constrained network as defined in the 2011 Regional Transportation Plan. *Alternative A* includes no changes and thus is the Adopted scenario. *Alternative B* adds a proposed development into TAZ 3491 which is located in the middle of the community of North Park. *Alternative C* includes the proposed development in TAZ 3491 plus upgrading 32nd Street

between Redwood Street and University Avenue from a Two-Lane Local Collector to a Four-Lane Collector with a raised median. For the purpose of comparing apples to apples, all four scenarios have consistent TAZ systems. *Alternatives A and B* utilize the same network, however, *Alternative C* includes an upgraded network. To maintain the synonymous comparison, an additional metric of VMT per lane mile has been developed and documented later on in *Section 2.0* of this paper. **Appendix B** contains the results of the trip generation model for TAZ 3491 for the four scenarios.

VMT is a straight-forward calculation that includes traffic volume multiplied by the length of the roadway segment. VMT is usually measured on a daily basis or for a 24-hour period for each link in the road network. A network link is a modeling term used to identify road segments between two or more end points where the network might be accessed by vehicular traffic. Twenty-four hour volumes are often referred to as Average Daily Traffic (ADT) volumes. The 24-hour traffic volume and link lengths are the only two variables required to calculate VMT. This calculation can actually be made using any of the three tools previously noted in this paper (GIS, a Travel Demand Model, or a spreadsheet). Depending on how link lengths are stored, either of these two formulas can be applied:

1. Use where link lengths are stored in miles:

$$\text{VMT} = \text{ADT} * \text{LINK LENGTH}$$

2. Use where link lengths are stored in feet:

$$\text{VMT} = (\text{ADT} * \text{LINK LENGTH}) / 5,280$$

The main benefit of this methodology is the ability to define VMT by origin-destination (OD) pairs as well as by functional classification. Functional classifications are coded on a travel demand model network using GIS. VMT by OD pair includes the disaggregation of VMT into the following categories:

1. **Internal-to-Internal (I-I)**

This category includes trips that have both the Origin and Destination (two trip-ends) within the same city/community/development being analyzed. This, however, is not intra-zonal trips, which is defined as trips that start and end within the same TAZ and discussed later in this paper.

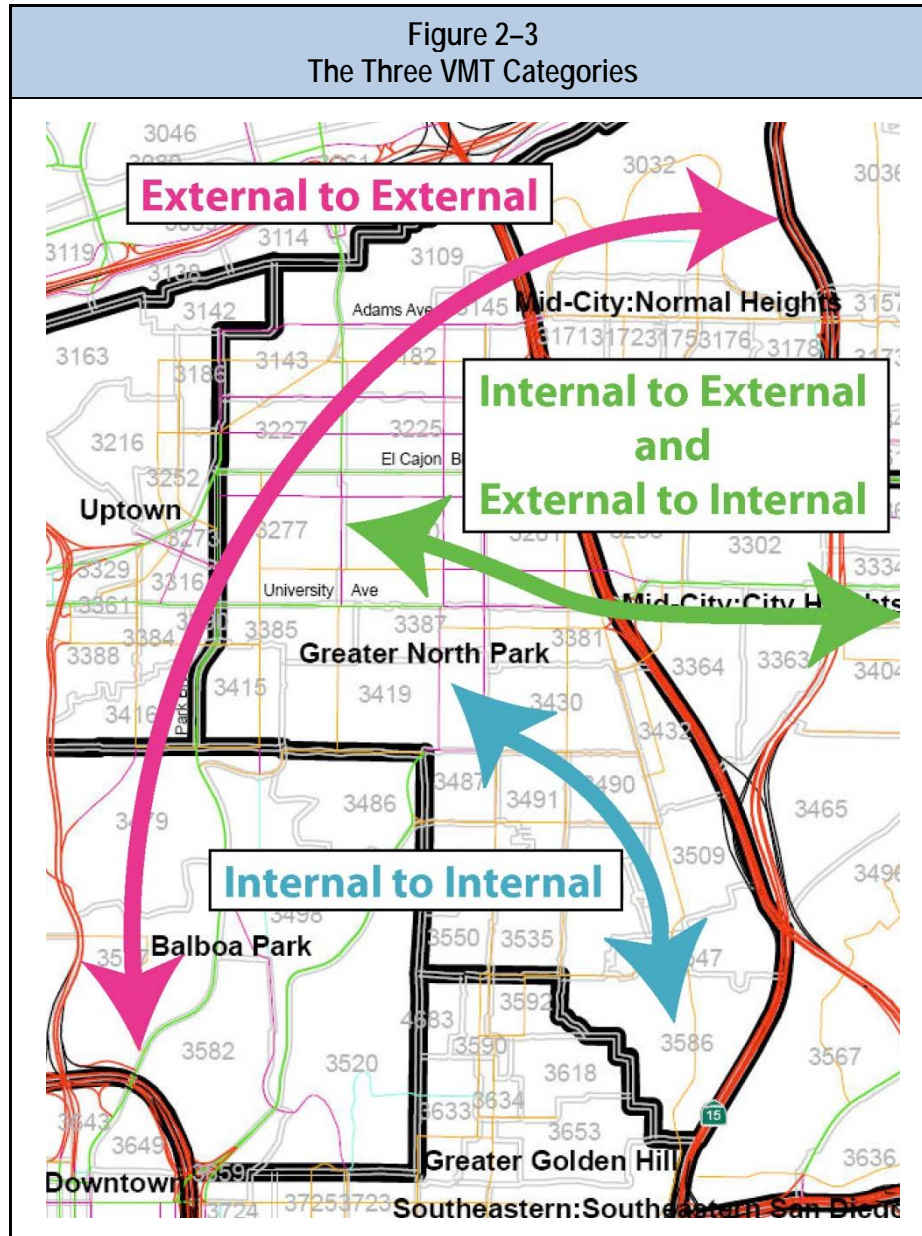
2. **Internal-to-External, and External-to-Internal (I-E, E-I)**

This category includes trips with either the Origin or Destination (one trip-end) within the city/community/development being analyzed. Internal-to-External and External-to-Internal have been combined into one category as directional VMT is not an important variable when analyzing GHG.

3. External-to-External (E-E)

The third category includes trips with neither Origin nor Destination (zero trip-ends) within the city/community/developments being analyzed. These are essentially trips passing through the city/community/development.

Figure 2-3 illustrates the three types of disaggregated VMT.



To disaggregate VMT using the OD methodology, the following detailed steps are recommended:

- Step 1.** Run a travel demand model on a set of land use / network scenarios. The scenarios will ultimately be compared to one another (alternatives analysis). Ensure there are no errors and the traffic assignment step completed normally.
- Step 2.** Use the travel demand model to run a “study area” select zone assignment. This includes defining a select zone analysis by combining all TAZs within the study area into one query. Repeat as necessary for each alternative being analyzed.
- Step 3.** Compress the resulting select zone trip table into two districts: the defined study area is district 2, and the rest of the region is district 1. This step is essential for extracting Internal-to-Internal VMT. Repeat as necessary for each alternative being analyzed. Export the compressed trip tables into a format that can be read by a spread sheet. (See *Figures 2–4* through 2–7)

Figure 2-4 Base Year 2008 Select Zone Trip Table Before Compression										
ORIGINS	DESTINATIONS									
	TAZ	1	2	3	4	5	6	7	8	9 ...4683
	1	6	0	0	0	0	0	0	0	0
	2	4	2	0	0	1	3	0	0	0
	3	0	0	0	0	0	0	0	0	0
	4	0	0	0	3	0	0	2	1	0
	5	2	1	0	0	2	2	0	0	0
	6	6	4	0	0	1	3	0	0	0
	7	0	0	0	2	0	0	2	0	0
	8	0	0	0	0	0	0	0	101	0
	9	0	0	0	0	0	0	0	0	0
	...4683	0	0	0	0	0	0	0	0	4

Figure 2-5
4683 TAZs Compressed into Two Districts

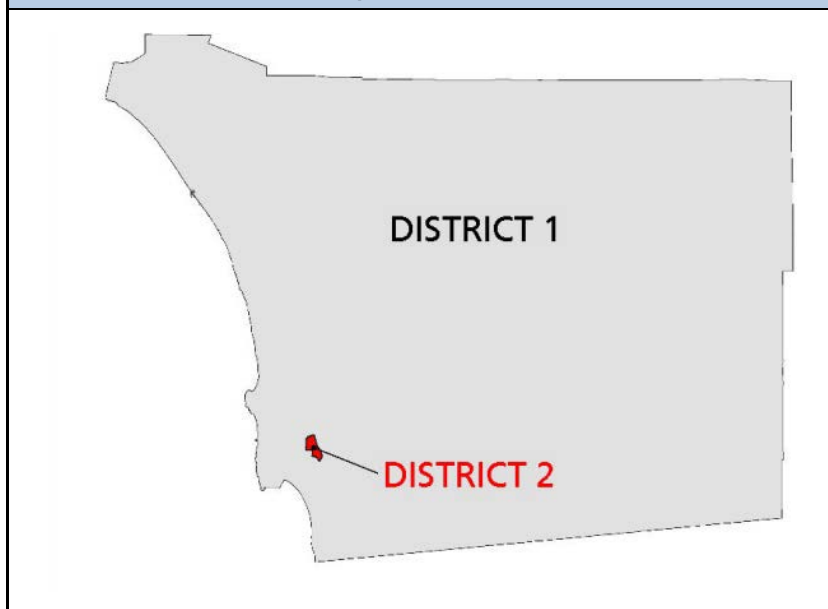


Figure 2-6
Actual Trip Table After Compression

		DESTINATIONS	
		DISTRICT	
ORIGINS	DISTRICT	1	2
	1	0	92970
	2	89154	25319

Figure 2-7
Conceptual Trip Table After Compression

		DESTINATIONS	
		DISTRICT	
ORIGINS	DISTRICT	1	2
	1	Both O&D OUTSIDE of North Park	O OUTSIDE of North Park, D INSIDE of North Park
	2	O INSIDE of North Park, D OUTSIDE of North Park	Both O&D INSIDE of North Park

In summary, this methodology includes creating a study area select zone assignment and compressing the select zone trip table to calculate the number of trips by district and determine the OD breakdown within those districts (I-I, E-I, I-E, and E-E).

The following defines the necessary steps to calculate intra-zonal trips.

Step 4. Extract intra-zonal trips and distance skims for each TAZ within the study area. While intra-zonal VMT will be a very small fraction of the overall region-wide VMT, it is still important to include and document. Intra-zonal trips and distances come from the diagonal rows of vehicular trip tables and distances skim files. Trip tables contain trip flows between TAZs. Skim files usually include travel time, travel distance, and/or travel cost between TAZs.

The distance skim is used to calculate intra-zonal trip distances. Intra-zonal trip distances are calculated by halving the average distance between the TAZ in question and its three nearest TAZ neighbor.

$$\text{Intra Zonal Distance} = ((D_{ij1} + D_{ij2} + D_{ij3}) / 3) / 2$$

Where:

D = Distance (in miles)

ij1 = Origin Zone to the first nearest neighbor

ij2 = Origin Zone to the second nearest neighbor

ij3 = Origin Zone to the third nearest neighbor

Or

$$0.23 = ((0.40 + 0.56 + 0.42) / 3) / 2$$

Figures 2–8 and **2–9** illustrate the intra-zonal data extracted in spreadsheet-format.

**Figure 2-8
Intra-Zonal Cells Within the Base Year 2008 AM Trip Table**

ORIGINS	DESTINATIONS										
	TAZ	3486	3487	3488	3489	3490	3491	3492	3493	3494	3495
	3486	6	0	0	0	0	0	0	0	0	0
	3487	4	2	0	0	1	3	0	0	0	0
	3488	0	0	0	0	0	0	0	0	0	0
	3489	0	0	0	3	0	0	2	1	0	0
	3490	2	1	0	0	2	2	0	0	0	0
	3491	6	4	0	0	1	3	0	0	0	0
	3492	0	0	0	2	0	0	2	0	0	0
	3493	0	0	0	0	0	0	0	101	0	0
	3494	0	0	0	0	0	0	0	0	0	0
	3495	0	0	0	0	0	0	0	0	0	4

Figure 2-9 Calculated Base Year 2008 Intra-Zonal VMT for North Park						
2008						
TAZ	INTRA DISTANCE	AM	PM	OP	INTRA TRIPS	INTRA VMT
3109	0.23	26	20	92	138	31.74
3143	0.20	17	20	94	131	26.20
3145	0.24	3	4	28	35	8.23
3180	0.25	32	50	302	384	94.08
3182	0.17	55	53	256	364	61.88
3225	0.19	38	50	263	351	64.94
3227	0.20	25	36	210	271	54.20
3277	0.22	124	141	712	977	214.94
3280	0.21	133	172	965	1270	266.70
3281	0.25	82	137	879	1098	269.01
3381	0.23	21	40	282	343	78.89
3385	0.24	13	24	154	191	44.89
3387	0.25	16	20	127	163	40.75
3415	0.19	7	9	49	65	12.35
3419	0.30	20	14	55	89	26.70
3430	0.22	18	14	56	88	18.92
3432	0.23	2	0	3	5	1.13
3487	0.18	2	3	14	19	6.42
3490	0.16	2	1	3	6	0.96
3491	0.14	3	3	17	23	3.22
3509	0.23	3	4	21	28	6.30
3519	0.24	1	2	6	9	2.12
3521	0.22	21	14	68	103	22.15
3535	0.19	2	2	11	15	2.85
3547	0.38	2	0	2	4	1.52
3550	0.26	2	3	11	16	4.16
3586	0.67	7	8	30	45	30.15
TOTAL NORTH PARK INTRA-ZONAL VMT						1392.37

Steps 5 and 6 explain the final steps in calculating the three trip types necessary for calculating total VMT.

Step 5. Use GIS to process the results and export files that can be read by a spread sheet. The main goal of this step is to produce a table with VMT split by jurisdiction and road functional classification. Note that the following process was designed using an AML (Arc Macro Language) script which can be found in **Appendix C**. AML is the native scripting language of ESRI's Arc/INFO workstation software. This script could be duplicated using the scripting language Python for use in ESRI's ArcMap desktop

software. The results should be the same if AML is used in Arc/INFO or if Python is used in ArcMap. The following nine steps define the activities of the script:

- a. Create a network layer with additional attributes for analysis
- b. Create a lookup table to store the results of the select zone assignment
- c. Join the lookup table with the network layer
- d. Overlay the network layer with a polygon layer that represents jurisdictional boundaries
- e. Calculate daily VMT (formula above)
- f. Calculate select zone VMT using basically the same formula:
- g. $\text{Select Zone VMT} = (\text{Select Zone Query volume} * \text{Link Length}) / 5280$
- h. Perform a frequency function of the link attribute table. A frequency function returns the count of values that fall into a specific range. In this example, the values of the link Functional Classifications are used to summarize the daily and select zone query VMT.
- i. Output a text or CSV file that can be imported into a spread sheet (This file should have a minimum of 4 columns):
 1. Jurisdiction name
 2. Functional Classification Code
 3. Daily 24-hour VMT
 4. Select zone query VMT
- j. This file can have a variable number of rows (records) depending on the number of classifications defined in the network being analyzed as well as the granularity of the jurisdictions to analyze.
- k. Clip the network layer with the study area boundary and calculate bi-directional lane miles with the following formula:

$$\text{Lane Miles} = (\text{Total Lanes} * \text{Length}) / 5280$$

Aggregate the total lane miles within the study area and export one number for use in calculating VMT per Lane Mile in the spread sheet analysis. This step is crucial for the ability to compare network scenarios equitably. *Figure 2–10* shows the summarized lanes miles for each alternative analyzed in this paper.

Figure 2-10 Study Area Lane Miles by Scenario	
ALTERNATIVE	LANE MILES
2008	104.0
2050 A	111.5
2050 B	111.5
2050 C	113.0

Step 6. Use a spread sheet to calculate the three categories of VMT.

- a. Open the compressed select zone trip table and use it to calculate the internal capture percentage for the district that represents the city/community/development being studied. The internal capture rate represents the percent of Internal-to-Internal trips relative to the total study area VMT. **Figure 2-11** displays the compressed trip table. The formula shown below illustrates the internal capture calculation for the base year.

$$\text{Internal Capture Rate (\%)} = \text{I-I VMT (district 2 to 2)} \div \text{Total VMT } (\sum \text{ all districts})$$

Or

$$25,319 \div 207,443 = \underline{12.21\%}$$

**Figure 2-11
Compressed Trip Tables & Calculated Internal Capture Rate**

BASE YEAR 2008				
ORIGINS	DESTINATIONS			SUM
	DISTRICT	1	2	
	1	0	92,970	92,970
	2	89,154	25,319	114,473
SUM		89,154	118,289	207,443
INTERNAL CAPTURE RATE				12.21%
2050 A				
ORIGINS	DESTINATIONS			SUM
	DISTRICT	1	2	
	1	0	127,947	127,947
	2	121,689	30,051	151,740
SUM		121,689	157,998	279,687
INTERNAL CAPTURE RATE				10.74%
2050 B				
ORIGINS	DESTINATIONS			SUM
	DISTRICT	1	2	
	1	0	131,176	131,176
	2	124,400	31,817	156,217
SUM		124,400	162,993	287,393
INTERNAL CAPTURE RATE				11.07%
2050 C				
ORIGINS	DESTINATIONS			SUM
	DISTRICT	1	2	
	1	0	131,215	131,215
	2	124,429	31,799	156,228
SUM		124,429	163,014	287,443
INTERNAL CAPTURE RATE				11.06%

E-E (Zero Trip-Ends)

I-E and E-I (One Trip-End)

I-I (Two Trip-Ends)

Internal Capture Rate (I-I ÷ Sum)

District 1 = Everything BUT North Park

District 2 = North Park

A value other than zero in the District 1-to-District 1 cell indicates one of the following potential issues: 1) A miss-match between the list of TAZs used for the community-wide select zone assignment compared to the definition of the study area Districts; or 2) one or more of the study area TAZs straddle a community or city boundary.

Analyzing the 2050 No Build scenario (*Alternative A*), the result shows that the model predicts 10.74% of trips with an origin inside of Greater North Park will also have a destination within Greater North Park. This will become the factor to apply to total VMT within Greater North Park to calculate Internal-to-Internal VMT.

- a. Open the text or CSV file created from GIS, which will become the main worksheet.
- b. Add four columns, one for each of the three VMT categories noted above plus one for intra-zonal VMT. **Figure 2-12** shows the column headers for each VMT category.

Figure 2-12 Worksheet Headers							
SCENARIO							
JURISDICTION	CLASSIFICATION	TOTAL VMT	TOTAL NORTH PARK VMT (I-I, I-E, E-I, & E-E)	TWO TRIP-ENDS NORTH PARK VMT (I-I)	ONE TRIP-END NORTH PARK VMT (I-E and E-I)	NON-NORTH PARK VMT (E-E)	NORTH PARK INTRA-ZONAL VMT (INTRA)

The post-SANDAG forecast process creates a standard report called “postlod2.pr” that summarizes many modeling metrics including VMT. The reports used to validate this methodology can be found in **Appendix D**. The “Total VMT” column contains 24-hour daily VMT and the “Total North Park VMT” includes the study area select zone assignment VMT.

Calculate the “Two Trip-Ends” category with the following formula, but only for the city/community/development being analyzed as the rest of the two trip end records should all be null. **Figure 2-13** shows the spread sheet results.

$$\text{I-I VMT} = (\text{select zone query VMT} * \text{internal capture \% calculated in Step 6a})$$

Or

$$212,850 * 12.21\% = \underline{25,979 \text{ I-I VMT}}$$

**Figure 2-13
Two Trip-Ends VMT Calculations**

BASE YEAR 2008							
JURISDICTION	CLASSIFICATION	TOTAL VMT	TOTAL NORTH PARK VMT (I-I, I-E, E-I, & E-E)	TWO TRIP-ENDS NORTH PARK VMT (I-I)	ONE TRIP-END NORTH PARK VMT (I-E and E-I)	NON-NORTH PARK VMT (E-E)	NORTH PARK INTRA-ZONAL VMT (INTRA)
GNC	1 Freeway	327,268	36,989	4,515	32,474	290,279	
GNC	3 Major	67,085	49,701	6,066	43,635	17,384	
GNC	4 Collector	44,221	35,296	4,308	30,988	8,925	
GNC	5 Local Collector	52,603	42,254	5,157	37,097	10,349	
GNC	8 Freeway Ramp	35,242	4,325	528	3,797	30,917	
GNC	9 Local Ramp	8,697	5,837	712	5,125	2,860	
GNC	10 Zone Connector	38,447	38,448	4,693	33,755	(1)	
GNC	11 Intra-Zonal						1,392
GNC	Total	573,563	212,850	25,979	186,871	360,713	1,392

*GNC = Greater North Park

Calculate the “One Trip-End” category with the following formula for all records:

$$\text{I-E \& E-I VMT} = (\text{select zone query VMT} - \text{I-I VMT})$$

Or

$$212,850 - 25,979 = 186,871 \text{ I-E \& E-I VMT}$$

Figure 2-14 shows the spread sheet results.

**Figure 2-14
One Trip-Ends VMT Calculations**

BASE YEAR 2008							
JURISDICTION	CLASSIFICATION	TOTAL VMT	TOTAL NORTH PARK VMT (I-I, I-E, E-I, & E-E)	TWO TRIP-ENDS NORTH PARK VMT (I-I)	ONE TRIP-END NORTH PARK VMT (I-E and E-I)	NON-NORTH PARK VMT (E-E)	NORTH PARK INTRA-ZONAL VMT (INTRA)
GNC	1 Freeway	327,268	36,989	4,515	32,474	290,279	
GNC	3 Major	67,085	49,701	6,066	43,635	17,384	
GNC	4 Collector	44,221	35,296	4,308	30,988	8,925	
GNC	5 Local Collector	52,603	42,254	5,157	37,097	10,349	
GNC	8 Freeway Ramp	35,242	4,325	528	3,797	30,917	
GNC	9 Local Ramp	8,697	5,837	712	5,125	2,860	
GNC	10 Zone Connector	38,447	38,448	4,693	33,755	(1)	
GNC	11 Intra-Zonal						1,392
GNC	Total	573,563	212,850	25,979	186,871	360,713	1,392

*GNC = Greater North Park

Calculate the “Zero Trip-End” or “through trips” category with the following formula for all records:

$$\text{E-E VMT} = (\text{24-hour total VMT} - \text{select zone query VMT})$$

Or

$$573,563 - 212,850 = 360,713 \text{ E-E VMT}$$

Figure 2–15 shows the spread sheet results.

Figure 2-15 Zero Trip-Ends VMT Calculations							
BASE YEAR 2008							
JURISDICTION	CLASSIFICATION	TOTAL VMT	TOTAL NORTH PARK VMT (I-I, I-E, E-I, & E-E)	TWO TRIP-ENDS NORTH PARK VMT (I-I)	ONE TRIP-END NORTH PARK VMT (I-E and E-I)	NON-NORTH PARK VMT (E-E)	NORTH PARK INTRA-ZONAL VMT (INTRA)
GNC	1 Freeway	327,268	36,989	4,515	32,474	290,279	
GNC	3 Major	67,085	49,701	6,066	43,635	17,384	
GNC	4 Collector	44,221	35,296	4,308	30,988	8,925	
GNC	5 Local Collector	52,603	42,254	5,157	37,097	10,349	
GNC	8 Freeway Ramp	35,242	4,325	528	3,797	30,917	
GNC	9 Local Ramp	8,697	5,837	712	5,125	2,860	
GNC	10 Zone Connector	38,447	38,448	4,693	33,755	(1)	
GNC	11 Intra-Zonal						1,392
GNC	Total	573,563	212,850	25,979	186,871	360,713	1,392

*GNC = Greater North Park

Cross check each of the last three calculations by comparing the study area total sums with the sum of each functional classification, as shown in **Figure 2–16**.

Figure 2-16
Cross-Checking of VMT Calculations

BASE YEAR 2008							
JURISDICTION	CLASSIFICATION	TOTAL VMT	TOTAL NORTH PARK VMT (I-I, I-E, E-I, & E-E)	TWO TRIP-ENDS NORTH PARK VMT (I-I)	ONE TRIP-END NORTH PARK VMT (I-E and E-I)	NON-NORTH PARK VMT (E-E)	NORTH PARK INTRA-ZONAL VMT (INTRA)
GNC	1 Freeway	327,268	36,989	4,515	32,474	290,279	
GNC	3 Major	67,085	49,701	6,066	43,635	17,384	
GNC	4 Collector	44,221	35,296	4,308	30,988	8,925	
GNC	5 Local Collector	52,603	42,254	5,157	37,097	10,349	
GNC	8 Freeway Ramp	35,242	4,325	528	3,797	30,917	
GNC	9 Local Ramp	8,697	5,837	712	5,125	2,860	
GNC	10 Zone Connector	38,447	38,448	4,693	33,755	(1)	
GNC	11 Intra-Zonal						1,392
GNC	Total	573,563	212,850	25,979	186,871	360,713	1,392

*GNC = Greater North Park

Incorporate the summary of intra-zonal VMT from **Step 4** as shown in **Figure 2-17**.

Figure 2-17
Intra-Zonal Trips

BASE YEAR 2008							
JURISDICTION	CLASSIFICATION	TOTAL VMT	TOTAL NORTH PARK VMT (I-I, I-E, E-I, & E-E)	TWO TRIP-ENDS NORTH PARK VMT (I-I)	ONE TRIP-END NORTH PARK VMT (I-E and E-I)	NON-NORTH PARK VMT (E-E)	NORTH PARK INTRA-ZONAL VMT (INTRA)
GNC	1 Freeway	327,268	36,989	4,515	32,474	290,279	
GNC	3 Major	67,085	49,701	6,066	43,635	17,384	
GNC	4 Collector	44,221	35,296	4,308	30,988	8,925	
GNC	5 Local Collector	52,603	42,254	5,157	37,097	10,349	
GNC	8 Freeway Ramp	35,242	4,325	528	3,797	30,917	
GNC	9 Local Ramp	8,697	5,837	712	5,125	2,860	
GNC	10 Zone Connector	38,447	38,448	4,693	33,755	(1)	
GNC	11 Intra-Zonal						1,392
GNC	Total	573,563	212,850	25,979	186,871	360,713	1,392

*GNC = Greater North Park

Create subtotals for each jurisdiction across all VMT categories and facility types, and compare the region-wide totals, as shown in **Figure 2-18**.

Figure 2-18 Jurisdictional VMT Summaries					
SCENARIO					
JURISDICTION	TOTAL VMT	TOTAL NORTH PARK VMT	TWO TRIP-ENDS NORTH PARK VMT	ONE TRIP-END NORTH PARK VMT	NON-NORTH PARK VMT
CARLSBAD TOTAL	3,344,783	6,864	-	6,864	3,337,919
CHULA VISTA TOTAL	3,944,329	26,635	-	26,635	3,917,694
CORONADO TOTAL	425,415	7,511	-	7,511	417,904
DEL MAR TOTAL	97,997	151	-	151	97,846
EL CAJON TOTAL	2,170,595	13,539	-	13,539	2,157,056
ENCINITAS TOTAL	2,072,646	8,464	-	8,464	2,064,182
ESCONDIDO TOTAL	2,804,158	6,095	-	6,095	2,798,063
External TOTAL	348,011	1,233	-	1,233	346,778
IMPERIAL BEACH TOTAL	118,284	215	-	215	118,069
LA MESA TOTAL	1,816,617	22,479	-	22,479	1,794,138
LEMON GROVE TOTAL	824,528	9,186	-	9,186	815,342
NATIONAL CITY TOTAL	1,637,674	23,317	-	23,317	1,614,357
OCEANSIDE TOTAL	3,187,796	2,198	-	2,198	3,185,598
POWAY TOTAL	1,107,444	2,234	-	2,234	1,105,210
SAN DIEGO TOTAL	38,508,241	983,410	25,979	957,385	37,488,977
SAN MARCOS TOTAL	2,058,102	1,890	-	1,890	2,056,212
SANTEE TOTAL	855,495	2,757	-	2,757	852,738
SOLANA BEACH TOTAL	567,459	3,108	-	3,108	564,351
Unincorporated TOTAL	17,470,189	44,274	-	44,274	17,425,915
VISTA TOTAL	1,712,782	279	-	279	1,712,503
Summary	85,072,545	1,165,839	25,979	1,139,814	83,870,852

Validate the VMT data by summarizing and cross-checking it via other sources such as the post-forecast report “postlod2.pr”, previously discussed. **Figure 2–19** shows this comparison.

Figure 2–19 Validation by Summary Cross-Check		
REGIONAL VALIDATION BY SUMMARY BASE YEAR 2008		
Reported:	Post-forecast VMT report (postlo2.pr)	85,057,878
Assigned:	Assigned sum of all VMT	85,072,545
Disaggregated:	Sum of all VMT using this method	85,036,645
SUMMARY 1: (ASSIGNED – REPORTED)		
Absolute VMT Difference		(15,333)
Percent VMT Difference		-0.01802%
SUMMARY 2: (DISAGGREGATED – REPORTED)		
Absolute VMT Difference		(51,233)
Percent VMT Difference		-0.06021
SUMMARY 3: (DISAGGREGATED – ASSIGNED)		
Absolute VMT Difference		35,900
Percent VMT Difference		-0.04222%

Compare the calculated 24-hour VMT with reports or some metric from the travel demand model. This table, shown above in *Figure 2–19*, compares three levels of VMT calculations: “Reported” VMT is generated after each model scenario and is included in the “postload2.pr” reports provided in *Appendix D*. “Assigned” includes calculating total VMT via a travel demand model, a GIS or a spread sheet. “Disaggregated” is the result of the methodology described in this white paper. If any of these three comparisons result in more than a 0.1% difference, it indicates a typo or an error during this analysis.

Complete statistical results of this methodology shown in graphical format are documented in *Appendix E*.

Figures 2–20 through **2–26** show a summary of the final results of the VMT calculations normalized by different factors: population, employment, dwelling units, person trips, lane miles, and acreage.

Figure 2-20
Final VMT, Population, Employment, Dwelling Units and Person Trips
Generated

ALTERNATIVE	TOTAL VMT	TOTAL NORTH PARK VMT	NORTH PARK POPULATION	NORTH PARK JOBS	NORTH PARK TOTAL UNITS	NORTH PARK PERSON TRIPS GENERATION
2008	573,563	212,850	47,548	8,697	24,795	375,074
2050 A	768,798	282,006	71,777	11,346	35,258	496,800
2050 B	775,137	290,202	73,475	11,614	36,092	519,036
2050 C	775,972	290,707	73,475	11,614	36,092	519,036

Figure 2-21
Final Results of the Methodology Normalized by Population

ALTERNATIVE	TOTAL VMT PER CAPITA	NORTH PARK TOTAL VMT PER CAPITA
2008	12.06	4.48
2050 A	10.71	3.93
2050 B	10.55	3.95
2050 C	10.56	3.96

Figure 2-22
Final Results of the Methodology Normalized by Employment

ALTERNATIVE	TOTAL VMT PER JOB	NORTH PARK TOTAL VMT PER JOB
2008	65.95	24.47
2050 A	67.76	24.86
2050 B	66.74	24.99
2050 C	66.81	25.03

Figure 2-23
Final Results of the Methodology Normalized by Dwelling Units

ALTERNATIVE	TOTAL VMT PER DWELLING UNIT	NORTH PARK TOTAL VMT PER DWELLING UNIT
2008	23.13	8.58
2050 A	21.80	8.00
2050 B	21.48	8.04
2050 C	21.50	8.05

Figure 2-24 Final Results of the Methodology Normalized by Person Trips Generated		
ALTERNATIVE	TOTAL VMT PER PERSON TRIPS GENERATED	NORTH PARK TOTAL VMT PER PERSON TRIPS GENERATED
2008	1.53	0.57
2050 A	1.55	0.57
2050 B	1.49	0.56
2050 C	1.50	0.56

Figure 2-25 Final Results of the Methodology Normalized by Lane Miles					
ALTERNATIVE	LANE MILES	TOTAL VMT	TOTAL VMT PER LANE MILE	NORTH PARK TOTAL VMT	TOTAL NORTH PARK VMT PER LANE MILE
2008	104.0	573,563	5,515.0	212,850	2,046.6
2050 A	111.5	768,798	6,895.0	282,006	2,529.2
2050 B	111.5	775,137	6,951.9	290,202	2,602.7
2050 C	113.0	775,972	6,867.0	290,707	2,572.6

Figure 2-26 Final Results of the Methodology Normalized by Acreage					
ALTERNATIVE	STUDY AREA ACREAGE	TOTAL VMT	TOTAL VMT PER ACRE	NORTH PARK TOTAL VMT	TOTAL NORTH PARK VMT PER ACRE
2008	2257.4	573,563	254.1	212,850	94.3
2050 A	2257.4	768,798	340.6	282,006	124.9
2050 B	2257.4	775,137	343.4	290,202	128.6
2050 C	2257.4	775,972	343.7	290,707	128.8

3.0 APPLICATION

Once all modeling work has been completed to generate disaggregated VMT for the study area, the information produced is then applied to the significance findings of the Environmental Impact Report (EIR) Climate Action Plan (CAP). The CAP focuses on the greenhouse gas (GHG) emissions on a pre- and post-project basis. VMT is a primary factor in measuring GHG as it relates to carbon dioxide emissions and the associated significant environmental impacts. As previously mentioned in the introduction to this paper, VMT is disaggregated in three categories:

- Internal-Internal (I-I): all VMT should be included in the analysis
- Internal-External (I-E) or External-Internal (E-I): 50% of VMT should be included in the analysis
- External-External (E-E): all VMT should be excluded in the analysis

The Methodology section describes the regional traffic modeling software's ability to derive the needed VMT information for a specific study area. The application of the VMT modeling output is covered in this section, with the continued use of North Park as the study area.

The key reasoning for disaggregating VMT into three separate types is to accurately evaluate North Park's estimated VMT, excluding the effect of other nearby jurisdictions. The community-wide inventory includes the VMT for all trips that begin and/or end within the Community limits of which are then split into the three categories. North Park would only be accountable for all trips within the Community limits (I-I), while it would share accountability with other jurisdictions for trips that have only one end point in the Community (I-E & E-I). All pass-through trips (E-E), would be excluded from the VMT results as the trips are not generated by land uses within the Community. This methodology is supported by the SB 375 Regional Targets Advisory Committee and ICLEI-Local Governments for Sustainability.

The current way the I-E and E-I trips are included in the CAP evaluation is by halving the results; North Park would be responsible for generating approximately 50% of the I-E and E-I trips. While this approach may over or under estimate North Park's contribution to Community VMT, it is presently the only viable approach given the difficulty in determining the origin or destination for an externally-oriented trip.

The data results of the I-I trips and half of the I-E and E-I trips are then input into the Urban Emissions Model (URBEMIS) or similar software, along with other determining factors, to estimate the projected emissions generated by North Park VMT. The thresholds set forth by AB 32 are used to measure the significance of emission levels between pre- and post-project conditions.

4.0 CONCLUSION

This paper provides an introduction discussing the recently adopted State legislation to reduce greenhouse gas (GHG) emissions to 1990 levels. As a result of these acts, environmental documents are required to evaluate the GHG levels proposed by projects (large-scale projects such as general plans and specific plans) as part of the CEQA process. As recommended to calculated GHG by the September 2009 Report to CARB by the SB 375 Regional Targets Advisory Committee and ICLEI's Community Protocol, VMT is defined as a unit to measure vehicle travel made by any individual vehicle, as classified by the three types of trips: Internal-Internal, Internal-External or External-Internal, and External-External. In order to disaggregate VMT into such classes, SANDAG has developed a modeling process to generate these results.

The Methodology section of this white paper discusses the technical approach to using the traffic model to generate the three types of VMT trips. Listing of the tools needed, the data input, general assumptions, and the steps required are discussed in detail in this section. The methodology used generates the three VMT trip categories using a select-zone assignment approach to separate out, as accurately as possible, the trips produced by North Park land uses and the trips produced by outside jurisdictions. Observed VMT from the field is extremely difficult to calculate accurately, thus the method outlined in this white paper is compared to other computational methods of calculating VMT. To measure the margin of error for this type of data analysis, comparisons can be drawn between the calculated 24-hour VMT from the assignment, the select-zone assignment and the post-modeling report from the travel demand model. As shown in this paper, the methodology developed by SANDAG results in a 0.06% margin of error, which is well below the 0.1% margin of error threshold set by SANDAG.

The data produced through the SANDAG modeling process are then input into the Urban Emissions Model to conclude whether the project will result in a significant GHG impact.

Environmental documents prepared for the cities of La Mesa and Escondido have found success in implementing the methodology applied by SANDAG through the use of the travel demand model. The Final Environmental Impact Analysis (FEIR) for the Escondido General Plan Update, certified December 2011, utilized this technique for calculating GHG for the entire jurisdiction.

This paper has provided a quantitative approach for disaggregating VMT. The use of this information can be applied toward community-wide GHG inventories as well as at the large- to medium-scale project level (Initial Studies, Mitigated Declarations, Negative-Mitigated Declarations, Environmental Impacts Reports, and Environmental Impact Studies). However, it is recognized that other approaches to VMT calculations are in existence. The goal of this technical paper is to provide a more accurate approach for calculating VMT which would set the standard for VMT analyses in the San Diego Region as well as to influence other State and National agencies and institutions to adopt and utilize this methodology in their long-term VMT/GHG planning efforts.

5.0 NEXT STEPS

1. Validation and refinement: This white paper shall continue to be refined and validated on an as-needed basis in terms of methodology and application. The document shall be updated with data developed in support of General Plan and Community Plan updates for jurisdictions in genuine applications.
2. Travel demand model migration: This method shall remain valid for both a traditional 4-step travel demand model (trip-based) and for an Activity Based Model (tour-based). The primary reason for this methodology being portable is that it utilizes trip tables input into the traffic assignment stage as well as assigned traffic as an output of the traffic assignment stage. Since trip tables and traffic assignment are required steps for either model paradigm, this methodology will remain valid for either generation of travel demand models.
3. GIS migration: The AML script developed for this analysis using Arc/INFO workstation shall be ported to the ArcPy (Python) script language for use in ArcGIS.
4. Publication: This white paper shall continue to be vetted through the ITE Task Force for publication. It shall also be vetted through several of SANDAG's working committees including SANTEC (San Diego Traffic Engineers' Council) and TWG (Regional Planning Technical Working Group). If accepted, it shall be presented at a TRB conference and forwarded to ICLEI for inclusion in the U.S. Community Protocol for Accounting and Reporting GHG Emissions.
5. Directional VMT: This method shall be further developed to allow for the analysis of directional VMT.
6. Trip Purpose VMT: This method shall also be further developed to factor VMT by trip purpose (i.e. home-to-work, home-to-school, etc).