



THE CITY OF SAN DIEGO

DEVELOPMENT SERVICES DEPARTMENT

Date of Notice: 2/20/2015

PUBLIC NOTICE OF A

DRAFT PROGRAM ENVIRONMENTAL IMPACT REPORT

SAP No.: 24002602

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The City of San Diego Development Services Department has prepared a draft Environmental Impact Report (EIR) for the following project and is inviting your comments regarding the adequacy of the document. The draft EIR and associated technical appendices have been placed on the City of San Diego web-site at <http://www.sandiego.gov/city-clerk/officialdocs/notices/index.shtml>. **Your comments must be received by April 7, 2015**, to be included in the final document considered by the decision-making authorities. Please send your written comments to the following address: **Jeffrey Szymanski, Environmental Planner, City of San Diego Development Services Center, 1222 First Avenue, MS 501, San Diego, CA 92101** or e-mail your comments to [DSDEAS@sandiego.gov](mailto:DSDEAS@sandiego.gov) with the Project Name and Number in the subject line.

**General Project Information:**

- Project Name: Union Tribune Mixed Use Project
- Project No. 277550 / SCH No. 2013031032
- Community Plan Area: Mission Valley
- Council District: 6

Subject: VESTING TENTATIVE MAP (VTM), PLANNED DEVELOPMENT PERMIT (PDP), and SITE DEVELOPMENT PERMIT (SDP) to develop a portion of the existing 12.86-acre San Diego Union Tribune (UT) site to add multiple uses including residential, retail, and public space uses. The project site is currently occupied by 168,575 square feet (sf) of office space and 191,600 sf of manufacturing land uses. The proposed project would consist of two new seven-story multi-unit residential buildings featuring 200 total dwelling units for a total of 285,645 sf of gross floor area, four stories of parking featuring 671 parking spaces for a total of 212,069 sf of gross floor area, conversion of 3,000 sf of ground floor area of the existing UT printing facility to retail amenity space, provision of a 23,455 sf public river walk promenade extending along the northern boundary of the project to the Fashion Valley Transit Center, and provision of a 11,947 sf public pocket park adjacent to the proposed river park. **Applicant:** Mission Valley Holdings, LLC

**Recommended Finding:** The draft EIR concludes that the project would result in significant but mitigated environmental impacts to the following areas **Land Use, Biological Resources, Geologic Conditions, Historical Resources (Archaeological), Paleontological Resources, and Noise (Construction)** and significant and unmitigated impacts related to: **Transportation/Circulation/Parking**.

**Availability in Alternative Format:** To request this Notice, the draft EIR, and/or supporting documents in alternative format, call the Development Services Department at 619-446-5460 or (800) 735-2929 (TEXT TELEPHONE).

**Additional Information:** For environmental review information, contact Jeffrey Szymanski at (619) 446-5324. The draft EIR and supporting documents may be reviewed, or purchased for the cost of reproduction, at the Fifth floor of the Development Services Center. If you are interested in obtaining additional copies of either the Compact Disk (CD), or a hard-copy of the draft EIR, they can be purchased for an additional cost. **For information regarding public meetings/hearings on this project, contact William Zounes at (619) 687-5942.** This notice was published in the SAN DIEGO DAILY TRANSCRIPT and distributed on 2/20/15.

Kerry Santoro  
Interim Deputy Director  
Development Services Department



Land Development  
Review Division  
(619) 446-5460

**DRAFT**  
**ENVIRONMENTAL IMPACT REPORT**

**Project No. 277550**  
**SCH No. 2013031032**

**SUBJECT:** **UNION TRIBUNE MIXED USE:** VESTING TENTATIVE MAP (VTM), PLANNED DEVELOPMENT PERMIT (PDP), and SITE DEVELOPMENT PERMIT (SDP) to develop a portion of the existing 12.86-acre San Diego Union Tribune (UT) site to add multiple uses including residential, retail, and public space uses. The project site is currently occupied by 168,575 square feet (sf) of office space and 191,600 sf of manufacturing land uses. The proposed project would consist of two new seven-story multi-unit residential buildings featuring 200 total dwelling units for a total of 285,645 sf of gross floor area, four stories of parking featuring 671 parking spaces for a total of 212,069 sf of gross floor area, conversion of 3,000 sf of ground floor area of the existing UT printing facility to retail amenity space, provision of a 23,455 sf public river walk promenade extending along the northern boundary of the project to the Fashion Valley Transit Center, and provision of a 11,947 sf public pocket park adjacent to the proposed river park.

The proposed project also includes a new central driveway at the ground level, which would provide access between the two new residential buildings, the existing UT office building and printing building, and ingress/egress with Camino De La Reina to the east. There would also be additional surface parking spaces provided at the western side of the project site. The 12.86-acre project site is located in the Mission Valley Community Planning Area within the City of San Diego, California. The property is located at the northwest corner of Interstate 8 (I-8) and State Route 163 (SR-163), and fronts Camino De La Reina to the south and east, and is bounded by the San Diego River to the north and the Town and Country Hotel to the west. Approval of the VTM would allow the Applicant to subdivide the 12.86-acre site into three separate lots. Specifically, the project site would be located on Lot 2 of Map No. 6860 (APN 437-260-41). The majority of the project site is zoned MVPD-MV-I (Industrial). The MVPD-MV-I district, or MV-I, is a Planned District zone specifically for the Mission Valley Planned District. The remaining portion of the site, approximately 850 sf of the northeast corner, is zoned OF-1-1 (Open Space – Floodplain). Elevations at the site range from approximately 40 feet above mean sea level (amsl) at the southern end of the property to 28 feet amsl at the northern end, as it slopes gently down toward the San Diego River. **Applicant:** Mission Valley Holdings, LLC

## CONCLUSIONS:

Based on the analysis conducted for the project described above, the City has prepared the following Draft Environmental Impact Report (DEIR) in accordance with the California Environmental Quality Act (CEQA) to inform public agency decision-makers and the public of significant environmental effects that could result if the project is approved and implemented, identify possible way to minimize the significant effects, and describe reasonable alternatives to the project (State CEQA Guidelines Section 15121). The evaluation of environmental issue areas in this EIR concludes that the proposed project would result in significant and unmitigated direct and cumulative impacts to **Transportation/Circulation/Parking**.

It is further demonstrated in the attached EIR that the proposed project would result in potentially significant but mitigable impacts to the following issue areas: **Land Use, Biological Resources, Geologic Conditions, Historical Resources (Archaeological), Paleontological Resources, and Noise (Construction)**. The proposed project's impacts for the following issue areas were determined to be less than significant or no impact was identified: **Greenhouse Gas Emissions, Hydrology, Public Services and Facilities, Public Utilities, Visual Quality/Neighborhood Character, Water Quality, Air Quality, Agricultural and Forest Resources, Health and Safety and Hazardous Materials, Historical Resources (Built Environment), Mineral Resources, and Population and Housing**.

## MITIGATION, MONITORING AND REPORTING PROGRAM:

A series of mitigation measures are identified within each issue area discussion in Section 5.0 of the EIR to reduce environmental impacts. The mitigation measures are also fully contained in Section 10.0, Mitigation Monitoring and Reporting Program, of the EIR for the following issue areas: **Land Use, Transportation/Circulation, Biological Resources, Geologic Conditions, Historical Resources (Archaeological), Paleontological Resources, and Noise (Construction)**. The attached DEIR and Technical Appendices document the reasons to support the above determination.

## RECOMMENDED ALTERNATIVES FOR REDUCING SIGNIFICANT UNMITIGATED IMPACTS:

Based on the requirement that alternatives reduce significant impacts associated with the proposed project, the EIR considers the following Project Alternatives, which are further detailed in the Executive Summary and Section 9.0 of the EIR:

1. No Project (No Development) Alternative
2. Reduced Density Alternatives
  - a. Reduced Residential Density to Avoid Traffic Impacts Alternative
  - b. Reduced Residential Density Alternative (135 DU)

The following is a summary of the Alternatives analyzed in detail in Section 9.0 of the EIR:

**1. No Project (No Development) Alternative**

The No Project (No Development) Alternative would retain the site in its current condition, including the existing one-story automotive service center, five-story commercial office building, three-story printing facility, and surface parking lot. No new development, including the proposed 3.5 story parking structure, new residential buildings with 200-units on top of four-stories of parking, 3,000 square feet of retail space, or 13 new townhomes, would occur.

When compared to the proposed project, the No Project (No Development) Alternative would avoid the unavoidable traffic/circulation/parking impacts. The No Project (No Development) Alternative would result in greater environmental effects associated with water quality and hydrology, because this alternative would not implement BMPs and would have greater impervious surfaces as compared to the proposed project. However, the No Project (No Development) Alternative would avoid impacts for all other issue areas. However, the No Project (No Development) Alternative would not meet any of the objectives of the project as identified in Chapter 3.0 of the EIR, and is, therefore, not recommended for selection and implementation.

**2. Reduced Density Alternatives**

In order to fully evaluate the range of possible alternatives that would avoid or reduce the impacts associated with the proposed project, a traffic sensitivity analysis was conducted. It addressed the critical street segments surrounding the project site to determine the land use intensity/level of development at which traffic/circulation related impacts would be reduced to a less than significant level per the City's traffic thresholds.

Based on the results of the traffic sensitivity analysis, any project proposed on the project site consisting of a development greater than 55 residential units would generate a number of daily trips which would exceed the City's thresholds and trigger significant direct and cumulative roadway segment impacts. Any project alternative proposing between 55 and 200 residential units would still result in significant and unmitigated impacts to traffic per the City's CEQA thresholds. As such two density alternatives were identified and analyzed in this EIR, the 55 residential units alternative that would avoid the traffic impacts and another alternative consisting of 135 residential units, which is a density between 55 units and 200 units proposed under the proposed project. The following provides the analysis for these two alternatives.

Reduced Residential Density to Avoid Traffic Impacts Alternative (55 DU)

The Reduced Residential Density to Avoid Traffic Impacts Alternative will include the construction of the following:

- New two-story multi-unit residential buildings featuring 55 dwelling units for a total of approximately 66,211 square feet of general floor area;
- Parking lot featuring approximately 173 parking spaces located at grade of the residential buildings (Northwest Building);
- Conversion of 3,000 square feet of ground floor area of the existing UT printing building to retail commercial use; and,
- Implementation of the San Diego River Park Master Plan along the north boundary of the project, including an extension of the San Diego River Park trail from the Town and Country Resort property to the west, and the provision of a public pocket park adjacent to the River Park area, which would include approximately 35,402 square feet (River Park is 23,455 square feet and public pocket park is 11,947 square feet).

When compared to the proposed project, the Reduced Residential Density to Avoid Traffic Impacts Alternative would avoid the unavoidable traffic/circulation/parking impacts. The Reduced Residential Density to Avoid Traffic Impacts Alternative would result in similar impacts for all other issue areas; however, as some issue areas will be slightly reduced due to the reduction in residential units (i.e., air quality, noise, public utilities, and public services and facilities).

Reduced Residential Density Alternative (135 DU)

The Reduced Residential Density Alternative (135 DU) will include the construction of the following:

- New four-story multi-unit residential buildings featuring 135 DU for a total of approximately 175,547 square feet of general floor area;
- Two-story parking structure featuring approximately 383 parking spaces located at grade and above grade of the residential buildings (Northwest Building);
- Conversion of 3,000 square feet of ground floor area of the existing UT printing building to retail commercial use; and,
- Implementation of the San Diego River Park Master Plan along the north boundary of the project, including an extension of the San Diego River Park trail from the Town and Country Resort property to the west, and the provision of a public pocket park adjacent to the River Park area, which would include approximately 35,402 square feet (River Park is 23,455 square feet and public pocket park is 11,947 square feet).

When compared to the proposed project, the Reduced Residential Density Alternative (135 DU) would result in similar unavoidable traffic impacts as compared to the proposed project with the exception of the avoidance of a direct impact at the street segment of Hotel Circle N. from

Fashion Valley Road to Camino De La Reina. The Reduced Residential Density Alternative (135 DU) would result in similar impacts for all other issue areas; however, as some issue areas will be slightly reduced due to the reduction in residential units (i.e., air quality, noise, public utilities, and public services and facilities).

### **Environmentally Superior Alternative**

Under CEQA Guidelines Section 15126.6(e)(2), if the No Project Alternative is the environmentally superior alternative, the EIR must also identify which of the other alternatives is environmentally superior. The EIR identified the Reduced Density to Avoid Traffic Impacts Alternative as the environmentally superior alternative because it would avoid all of the significant and unmitigated direct and cumulative traffic impacts when compared to the proposed project.

### **PUBLIC REVIEW DISTRIBUTION:**

The following individuals, organizations, and agencies received a copy or notice of the DEIR and were invited to comment on its accuracy and sufficiency:

U.S. Fish & Wildlife Service (23)

#### State of California

Caltrans, District 11 (31)

California Department of Fish & Wildlife (32)

Department of Toxic Substance Control (39)

Regional Water Quality Control Board: Region 9 (44)

Department of Water Resources (45)

State Clearinghouse (46)

Office of Attorney General (50)

California Department of Transportation (51A)

California Department of Transportation (51B)

State Water Resources Control Board (55)

Native American Heritage Commission (56)

#### City of San Diego

Mayor's Office (91)

Council President Lightner, District 1 (MS 10A)

Councilmember Zapf, District 2 (MS 10A)

Councilmember Gloria, District 3 (MS 10A)

Councilmember Cole, District 4 (MS 10A)

Councilmember Kersey, District 5 (MS 10A)

Councilmember Cate, District 6 (MS 10A)

Councilmember Sherman, District 7 (MS 10A)

Councilmember Alvarez, District 8 (MS 10A)

Council President Pro Tem Emerald, District 9 (MS 10A)

Development Services Department

EAS – Jeffrey Szymanski

Transportation – Ann Gonsalvez / Farah Mahzari

Planning Review – Raynard Abalos

Fire Plan Review – Larry Trame

Engineering Review – Louis Schultz

Geology – Jim Quinn

Landscaping – Glenn Spindell

PUD-Water & Sewer Development – Mahmood Keshavarzi

Project Manager – Will Zounes

Deputy Director – Kerry Santoro

Planning Department

MSCP – Kristen Forburger

Plan Long Range Planning – Brian Schoenfisch

Park and Recreation – Craig Hooker

Park and Recreation- Robin Shifflet

Plan Facilities Financing – Oscar Galvez III

San Diego Fire-Rescue Department

Larry Trame (MS 603)

San Diego Police Department

Michael Pridemore

Park and Recreation Board (77)

Russ Gibbon (56d)

Library Department (81)

Mission Valley Branch Library (81r)

Mission Hills Branch Library (81q)

Historical Resources Board (87)

Environmental Services Department, Lisa Wood (93A)

Facilities Financing (MS 93B)

City Attorney's Office (MS 59)

Other Organizations and Interested Individuals

San Diego Association of Governments (SANDAG) (108)

San Diego County Regional Airport Authority (110)

San Diego Transit Corporation (112)

San Diego Gas & Electric (114)

Metropolitan Transit System (115)

San Diego River Park Foundation (163)

San Diego River Foundation / Coalition (164)

San Diego Natural History Museum (166)

San Diego Audubon Society (167)

Jim Puegh (167a)

San Diego River Conservancy (168)

San Diego State University, South Coastal Information Center (210)

San Diego Archaeological Center (212)

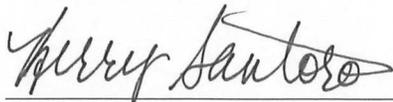
Save Our Heritage Organisation (214)

Ron Christman (215)  
Carmen Lucas (206)  
Clint Linton (215B)  
Frank Brown, Inter-Tribal Cultural Resources Council (216)  
Campo Band of Mission Indians (217)  
San Diego County Archaeological Society (218)  
Native American Heritage Commission (222)  
Kumeyaay Cultural Heritage Preservation (223)  
Kumeyaay Cultural Repatriation Committee (225)  
Native American Distribution (225A-S)  
Mission Valley Community Council (328C)  
Union Tribune News (329)  
San Diego River Conservancy (330A)  
Friends of Mission Valley Preserve (330B)  
General Manager, Fashion Valley (332)  
The San Diego River Coalition (334)  
Rincon Band of Luiseno Indians Cultural Committee  
Pauma Band of Luiseno Indians  
Dorothy Surdi, Chair Mission Valley Community Planning Group

**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 EIR. No response is necessary and the letters are attached at the end of the EIR.
- ( ) Comments addressing the accuracy or completeness of the DEIR were received during the public input period. The letters and responses are located immediately after the EIR Distribution List.

Copies of the DEIR, the Mitigation Monitoring and Reporting Program, and any technical appendices may be reviewed in the office of the Development Services Department, Mission Valley Branch Library, Mission Hills Branch Library, at <http://clerkdoc.sannet.gov/Website/publicnotice/pubnotceqa.html>, or purchased for the cost of reproduction.



Kerry Santoro  
Deputy Director  
Development Services Department

02/12/2015

Date of Draft Report

Analyst: Jeff Szymanski

Date of Final Report

Draft Environmental Impact Report (DEIR)  
for the  
Union Tribune Mixed Use Project  
SCH #2013031032 / PTS #277550



Prepared for  
The City of San Diego

Prepared by  
BRG Consulting, Inc.



February 2015

# Draft Environmental Impact Report

for the

## Union Tribune Mixed Use Project

SCH #2013031032 / PTS #277550

prepared for

City of San Diego

Development Services Department

1222 1<sup>st</sup> Ave

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February 2015

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## List of Technical Appendices

*(Bound with Draft EIR)*

Appendix A: Notice of Preparation and Comment Letters

*(Provided on CD)*

Appendix B: Traffic Impact Analysis  
*Prepared by Linscott, Law & Greenspan, Engineers*  
*February 12, 2015*

Appendix C: Greenhouse Gas Assessment  
*Prepared by Ldn Consulting, Inc.*  
*October 6, 2014*

Appendix D: Biological Resources Report  
*Prepared by Rocks Biological Consulting*  
*January 26, 2015*

Appendix E1: Geologic Reconnaissance  
*Prepared by Geocon Incorporated*  
*April 24, 2012*

Appendix E2: Response to City Comments  
*Prepared by Geocon Incorporated*  
*November 13, 2013*

Appendix E3: Update Geotechnical Letter  
*Prepared by Geocon Incorporated*  
*September 3, 2014*

Appendix E4: Response to City Comments  
*Prepared by Geocon Incorporated*  
*November 26, 2014*

Appendix F1: Preliminary Drainage Study  
*Prepared by Latitude 33 Planning & Engineering*  
*December 12, 2013*

Appendix F2: Addendum to the Preliminary Drainage Study  
*Prepared by Latitude 33 Planning & Engineering*  
*December 2014*

- Appendix G1: Water Quality Technical Report  
*Prepared by Latitude 33 Planning & Engineering  
April 2014*
- Appendix G2: Addendum to the Water Quality Technical Report  
*Prepared by Latitude 33 Planning & Engineering  
December 2014*
- Appendix H1: Preliminary Sewer Study  
*Prepared by Latitude 33 Planning & Engineering  
February 19, 2014*
- Appendix H2: Sewer Study Addendum  
*Prepared by Latitude 33 Planning & Engineering  
October 14, 2014*
- Appendix I: Waste Management Plan Update  
*Prepared by Latitude 33 Planning & Engineering  
October 2014*
- Appendix J: Water Supply Assessment Requirement Analysis  
*Prepared by Latitude 33 Planning & Engineering  
December 30, 2014*
- Appendix K: Traffic Sensitivity Analysis  
*Prepared by Linscott, Law & Greenspan, Engineers  
January 2015*
- Appendix L: Collocation/Conversion Suitability Factors Analysis  
*Prepared by BRG Consulting, Inc.  
January 26, 2015*

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# ACRONYMS

AB	Assembly Bill
ADD	Assistant Deputy Director
ADT	Average Daily Trips
AF	acre-feet
AIA	Airport Influence Area
ALUC	Airport Land Use Committee
ALUCP	Airport Land Use Compatibility Plan
amsl	above mean sea level
ARB	Air Resources Board
BAU	business as usual
BD/BA	bedroom/bath
BFE	Base Flood Elevation
BMP	Best Management Practice
B.P.	before present
CalEPA	California Environmental Protection Agency
CAPCOA	California Air Pollution Control Officers Association
CARB	California Air Resources Board
CAT	Climate Action Team
CBC	California Building Code
CCTP	Climate Change Technology Program
CDFW	California Department of Fish and Wildlife
CEQA	California Environmental Quality Act
cfs	cubic feet per second
CGS	California Geological Survey
CH <sub>4</sub>	methane
CLOMR	Conditional Letter of Map Revision
CNDDB	California Natural Diversity Database
CNEL	Community Noise Level Equivalent
CNPS	California Native Plant Society
CO	carbon monoxide
CO <sub>2</sub>	carbon dioxide
CO <sub>2</sub> e	carbon dioxide equivalent
CPA	Community Plan Amendment
CWA	Clean Water Act
DEV	developed/urban land
DIF	Developer Impact Facilities
DMG	Division of Mines and Geology
EIR	Environmental Impact Report
EO	Executive Order
EPA	Environmental Protection Agency

ESD	Environmental Services Department
ESL	Environmentally Sensitive Lands
EUC	Eucalyptus Woodland
FAA	Federal Aviation Administration
FAR	Federal Aviation Regulations
FBA	Facility Benefit Assessment
FCAA	Federal Clean Air Act
FEMA	Federal Emergency Management Agency
FIRM	Flood Insurance Rate Map
fps	feet per second
FU	fixture units
GCF	Green Climate Fund
GHG	Greenhouse Gas
GIS	Geographic Information System
gpd	gallons per day
GWP	Global Warming Potential
HA	Hydrologic Area
HFC	hydrofluorocarbon
HSA	Hydrologic Subarea
I-8	Interstate-8
IOD	Irrevocable Offer of Dedication
KWh	Kilowatt hours
LCFS	Low Carbon Fuel Standard
LDC	Land Development Code
LID	Low-Impact Design
LOS	Level of Service
MBTA	Migratory Bird Treaty Act
MGD	million gallons per day
MHPA	Multi-Habitat Planning Area
MLD	Most Likely Descendent
MM	mitigation measure
mmBTU	million British Thermal Units
MMC	Mitigation Monitoring Coordination
MPO	Metropolitan Planning Organization
MSCP	Multiple Species Conservation Program
MSL	Mean Sea Level
MTCO2E	metric tons carbon dioxide equivalent
MTS	Metropolitan Transit System
MVPD	Mission Valley Planned District
MXD	Mixed-Use Development
N <sub>2</sub> O	nitrous oxide
NAHC	Native American Heritage Commission
NNG	Non-Native Grassland

NOP	Notice of Preparation
NTP	Notice to Proceed
ORN	Ornamental
PDP	Planned Development Permit
PDWF	Peak Dry Weather Flow
PFC	perfluorocarbon
ppm	parts per million
PUD	Public Utilities Department
RBC	Rocks Biological Consulting
RHNA	Regional Housing Needs Assessment
RTP	Regional Transportation Plan
RWQCB	Regional Water Quality Control Board
SANDAG	San Diego Association of Governments
SB	Senate Bill
SCAQMD	South Coast Air Quality Management District
SCS	Sustainable Communities Strategy
SDG&E	San Diego Gas & Electric
SDIA	San Diego International Airport
SDP	Site Development Permit
SDRWQCB	San Diego Regional Water Quality Control Board
SDSU	San Diego State University
SDUSD	San Diego Unified School District
sf	square feet
SF <sub>6</sub>	sulfur hexafluoride
SFHA	Special Flood Hazard Area
SHMA	Seismic Hazards Mapping Act
SR-163	State Route 163
SWMC	Solid Waste Management Coordinator
SWPPP	Storm Water Pollution Prevention Plan
T <sub>c</sub>	time of concentration
TDM	Transportation Demand Management
TMDL	Total Maximum Daily Load
TOD	Transit Oriented Development
TRIMMS	Trip Reduction Impacts for Mobility Management Strategies
UBC	Uniform Building Code
UNFCCC	United Nations Framework Convention on Climate Change
USFWS	United States Fish and Wildlife Service
USGS	United States Geological Survey
UT	Union Tribune
VTM	Vesting Tentative Map
WMC	Waste Management Coordinator
WMP	Waste Management Plan

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# EXECUTIVE SUMMARY

## ES.1 Project Description

The San Diego Union Tribune and Manchester Financial Group propose to develop a portion of the existing 12.86-acre San Diego Union Tribune site at 350 Camino De La Reina to add multiple uses including residential, retail, and public space uses to the project site. When combined with the existing office and manufacturing uses on the site, the proposed project will create a pedestrian-friendly, transit-oriented, mixed-use project. Specifically, the proposed project will include the construction of the following:

- New seven-story multi-unit residential buildings featuring 200 dwelling units for a total of 285,645 square feet of gross floor area;
- Four-stories of parking featuring 671 parking spaces for a total of 212,069 square feet of gross floor area, to be located on a below-grade level and the first three levels of one the residential buildings (Northwest Building);
- Conversion of 3,000 square feet of ground floor area of the existing UT printing building to retail amenity space; and,
- Implementation of the San Diego River Park Master Plan along the northern boundary of the project, including an extension of the San Diego River Park trail from the Town and Country Resort property to the west and the provision of a public pocket park adjacent to the River Park area, which would include approximately 35,402 square feet (River Park is 23,455 square feet and public pocket park is 11,947 square feet).

## ES.2 Project Location and Setting

The project site is centrally located in the City of San Diego (City), within the Mission Valley Community Planning Area (see Figure 1-1, Regional Map). The Mission Valley Community Planning Area is comprised of approximately 2,418 net acres and is bound on the west by Interstate 5 (I-5), on the north by Friars Road west of State Route 163 (SR-163) and by the northern slopes of valley east of SR-163, on the east by the eastern back of the San Diego River, and on the south by the southern slopes of the valley. More specifically, the project site is located at the northwest corner of Interstate 8 (I-8) and SR-163, at 350 Camino De La Reina, San Diego, California, 92108. The project site comprises of Lot 2 of Map No. 6860 (APN 437-260-41). The project site fronts Camino De La Reina to the south and east, and is bounded by the San Diego River to the north, and the Town and Country Hotel to the west. The project site is approximately two miles northeast of San Diego International Airport and three miles southwest of Montgomery Field.

## ES.3 Project Objectives

In accordance with CEQA Guidelines Section 15124, the following objectives describe the underlying purpose of the project, assist the Lead Agency in developing reasonable range of alternatives to be evaluated in the EIR, and ultimately aid decision-makers in preparing findings and overriding considerations, if necessary.

- To provide a portion of the housing needs within the community;

- To provide a new public park amenity for the community;
- To provide a San Diego River Pathway;
- To provide a mixed-use Transit-Oriented Development (TOD) to accommodate the increasing growth in the region;
- To provide multiple land uses as in-fill development of an underutilized site within an urban area in close proximity to existing public transit;
- To provide connections to existing public transit;
- To provide additional parking for current and future employees and residents;
- To provide a residential development that reasonably maximizes the number of residential units on the project site without exceeding the Mission Valley Planned District Ordinance Threshold 2 for Traffic District C of 417 ADT per acre and subsequently not requiring the need for a Community Plan Amendment;
- To reasonably maximize the efficiency in use of the developable land on the site;
- To provide a project that is consistent with the City of Villages and Smart Growth policies, maximize residential development at an infill site, where public facilities, transit, and services are within walking distance; and,
- To provide development that is compatible in density, scale, and character with the other development within the Mission Valley community; and,
- To provide a development that is consistent with the goals and policies of the City of San Diego General Plan, City of Villages Strategy and Mission Valley Community Plan, which promote the development of multiple use projects that encourage the use of alternative modes of transportation and reduces vehicle miles traveled per capita.

## ES.4 Summary of Significant Effects and Mitigation Measures that Reduce or Avoid the Significant Effects

Table ES-1, located at the end of this section, summarizes the results of the environmental analysis completed for each issue area for the proposed project. Table ES-1 also includes mitigation measures to reduce and/or avoid the environmental effects, with a conclusion as to whether the impact has been mitigated to below a level of significance. The mitigation measures listed in Table ES-1 are also discussed accordingly within each environmental issue area.

Based on the analysis and conclusions of the EIR, implementation of the proposed project would result in significant and unavoidable traffic/circulation impacts. In addition, the proposed project would result in potentially significant but mitigable impacts to the following issue areas: land use, biological resources, geologic conditions, historical resources, paleontological resources, and noise. The project's impacts for all other issue areas were determined to be less than significant or no impact was identified.

## ES.5 Areas of Controversy

Section 15123(b)(2) of the CEQA Guidelines requires that areas of controversy known to the Lead Agency, including issues raised by agencies and the public, be identified in the Summary chapter of the EIR. To determine the number, scope and extent of the environmental topics to be addressed in this Draft EIR, the City prepared a Notice of Preparation (NOP) and circulated the NOP to interested public agencies, organizations, community groups and individuals in order to receive input on the proposed project. The NOP was distributed on March 13, 2013 for a 30-day public review and comment period, and a public scoping meeting was held on March 27, 2013. Public comments received on the NOP, and comments from the scoping meeting reflect controversy related to environmental issues to be discussed in the EIR.

Issues raised in response to the Notice of Preparation prepared and circulated for this Draft EIR focus around traffic/circulation and biological resource adjacency issues. The biological resource adjacency issues were raised through written comments from the California Department of Fish and Wildlife and the San Diego Audubon Society. In addition to written comments received, the City of San Diego held a public scoping meeting where verbal comments were provided in regards to biological resources and traffic/circulation issues.

## ES.6 Issues to be Resolved by the Decision-Making Body

As discussed in detail in Section 5.2 of this EIR, both direct and cumulative impacts to traffic/circulation would be significant and unavoidable. The City of San Diego Planning Commission must review the project and determine if the proposed project, or one of the alternatives presented in Section 9.0, or some combination of the project components, should be adopted and implemented. If the proposed project is selected for adoption, the Council will be required to certify the Final EIR, determine whether and how to mitigate significant impacts and adopt associated Findings (CEQA Guidelines Section 15091) for all significant impacts within the EIR. Furthermore, a Statement of Overriding Considerations pursuant to CEQA Guidelines Section 15093 would be required for those impacts found to be significant and unavoidable, including the direct and cumulative impacts associated with traffic/circulation.

In addition, the proposed project is requesting the following deviation from allowable requirements:

- Four (4) 8-foot-tall retaining walls and three (3) 7-foot-tall retaining walls, where 6 feet is allowed.

## ES.7 Project Alternatives

In order to fully evaluate the environmental effects of proposed projects, CEQA mandates that alternatives to the proposed project be analyzed. Section 15126.6 of the CEQA Guidelines requires the discussion of “a range of reasonable alternatives to the project, or to the location of the project, which would feasibly attain most of the basic objectives of the project but would avoid or substantially lessen any of the significant effects of the project” even if the alternatives would impede the attainment of the project objectives to some degree. As discussed in Section 9.0 Alternatives of this EIR, the following alternatives were considered but rejected:

- Alternative Site Location
- Previously Proposed Union Tribune Mixed-Use Alternative
- Office Only Alternative

The following alternatives were considered and analyzed in detail in Chapter 9.0 Alternatives of this EIR:

### **1. No Project (No Development) Alternative**

The No Project (No Development) Alternative would retain the site in its current condition, including the existing one-story automotive service center, five-story commercial office building, three-story printing facility, and surface parking lot. No new development, including the proposed 3.5 story parking structure, new residential buildings with 200-units on top of four-stories of parking, 3,000 square feet of retail space, or 13 new townhomes, would occur.

When compared to the proposed project, the No Project (No Development) Alternative would avoid the unavoidable traffic/circulation/parking impacts. The No Project (No Development) Alternative would result in greater environmental effects associated with water quality and hydrology, because this alternative would not implement BMPs and would have greater impervious surfaces as compared to the proposed project. However, the No Project (No Development) Alternative would avoid impacts for all other issue areas. However, the No Project (No Development) Alternative would not meet any of the objectives of the project as identified in Chapter 3.0 of this EIR, and is, therefore, not recommended for selection and implementation.

### **2. Reduced Density Alternatives**

In order to fully evaluate the range of possible alternatives that would avoid or reduce the impacts associated with the proposed project, a traffic sensitivity analysis was performed by Linscott Law and Greenspan (LLG) dated January 2015 and provided as Appendix K of this EIR. It addressed the critical street segments surrounding the project site to determine the land use intensity/level of development at which traffic/circulation related impacts would be reduced to a less than significant level per the City's traffic thresholds. The traffic sensitivity analysis was conducted for street segments only given that they are the "constrained" facility within the study area. If the alternative were to avoid significant street segment impacts, intersection impacts would also be avoided given the low trip generation. Based on the results of the analysis, it was determined that a new development consisting of 55 residential units could be built (in addition to the existing UT complex) which would reduce all of the traffic/circulation/parking impacts that were identified in this EIR with the implementation of the proposed project to a less than significant level.

Any project proposed on the project site consisting of a development greater than 55 residential units would generate a number of daily trips which would exceed the City's thresholds and trigger significant roadway segment impacts both in the Near-Term (Opening Day 2017) and Year 2035 (Horizon Year). Any project alternative proposing between 55 and 200 residential units would still result in significant and unavoidable impacts to traffic per the City's CEQA thresholds. As such two density alternatives were identified and analyzed in this EIR, the 55 residential units alternative that would avoid the traffic impacts and another alternative consisting of 135 residential units, which is a density between 55 units and 200 units proposed under the proposed project. The following provides the analysis for these two alternatives.

#### *Reduced Residential Density to Avoid Traffic Impacts Alternative (55 DU)*

The Reduced Residential Density to Avoid Traffic Impacts Alternative will include the construction of the following:

- New two-story multi-unit residential buildings featuring 55 dwelling units for a total of approximately 66,211 square feet of general floor area;

- Parking lot featuring approximately 173 parking spaces located at grade of the residential buildings (Northwest Building);
- Conversion of 3,000 square feet of ground floor area of the existing UT printing building to retail commercial use; and,
- Implementation of the San Diego River Park Master Plan along the north boundary of the project, including an extension of the San Diego River Park trail from the Town and Country Resort property to the west, and the provision of a public pocket park adjacent to the River Park area, which would include approximately 35,402 square feet (River Park is 23,455 square feet and public pocket park is 11,947 square feet).

Figures 9-1 and 9-2 provide a conceptual site plan and depict the ground floor level, respectively, of the Reduced Density to Avoid Traffic Impacts Alternative.

When compared to the proposed project, the Reduced Residential Density to Avoid Traffic Impacts Alternative would avoid the unavoidable traffic/circulation/parking impacts. The Reduced Residential Density to Avoid Traffic Impacts Alternative would result in similar impacts for all other issue areas; however, as some issue areas will be slightly reduced due to the reduction in residential units (i.e., air quality, noise, public utilities, and public services and facilities).

One of the primary objectives of the proposed project is to develop a mixed-use, TOD. As discussed above, the Reduced Density to Avoid Traffic Impacts Alternative would allow for a new development consisting of only 55 residential units on a project site that is suited for TOD, which when combined with the existing uses would create a site with multiple land uses on a site within close proximity to public transit. While at a greatly reduced development intensity, this alternative would still provide a mixed-use TOD that could accommodate the increasing growth in the region by providing a portion of the housing needs within the community. In addition, this alternative would still provide connections to existing public transit located adjacent to the project site. As such, this alternative would still meet some of the objectives of the proposed project.

The Reduced Density to Avoid Traffic Impacts Alternative would be in conformance with some of the objectives of the Mission Valley Community Plan, which promotes development intensities related to the planned transportation network, designated activity centers and river-related open spaces and encourages mixed-use complexes which offer environments for living, working, shopping and related activities (City of San Diego, 2013). Although this alternative provides minimal retail, the site's proximity to Fashion Valley Mall would still offer future residents an environment for living, working and shopping. In addition, this alternative would generally be in conformance with the City of Villages Strategy outlined in the City of San Diego General Plan, which promotes mixed-use villages throughout the City connected by high-quality transit (City of San Diego, 2008). While this alternative would not be considered a mixed-use village, it would still be a mixed-use development in close proximity to Fashion Valley Mall and adjacent to public transit.

This alternative would meet most of the project objectives. However, this alternative would not meet the following objectives at the same level as the proposed project because of the reduction in residential units proposed under this alternative:

- To provide a residential development that reasonably maximizes the number of residential units on the project site without exceeding the Mission Valley Planned District Ordinance Threshold 2 for Traffic District C of 417 ADT per acre and subsequently not requiring the need for a Community Plan Amendment;
- To reasonably maximize the efficiency in use of the developable land on this TOD suited site; and,
- To provide a project that is consistent with the City of Villages and Smart Growth policies, maximize residential development at an infill site, where public facilities, transit, and services are within walking distance.

Reduced Residential Density Alternative (135 DU)

The Reduced Residential Density Alternative (135 DU) will include the construction of the following:

- New four-story multi-unit residential buildings featuring 135 DU for a total of approximately 175,547 square feet of general floor area;
- Two-story parking structure featuring approximately 383 parking spaces located at grade and above grade of the residential buildings (Northwest Building);
- Conversion of 3,000 square feet of ground floor area of the existing UT printing building to retail commercial use; and,
- Implementation of the San Diego River Park Master Plan along the north boundary of the project, including an extension of the San Diego River Park trail from the Town and Country Resort property to the west, and the provision of a public pocket park adjacent to the River Park area, which would include approximately 35,402 square feet (River Park is 23,455 square feet and public pocket park is 11,947 square feet).

Figures 9-3 and 9-4 provide a conceptual site plan and depict the ground floor level, respectively, of the Reduced Residential Density Alternative (135 DU).

When compared to the proposed project, the Reduced Residential Density Alternative (135 DU) would result in similar unavoidable traffic impacts as compared to the proposed project with the exception of the avoidance of a direct impact at the street segment of Hotel Circle N. from Fashion Valley Road to Camino De La Reina. The Reduced Residential Density Alternative (135 DU) would result in similar impacts for all other issue areas; however, as some issue areas will be slightly reduced due to the reduction in residential units (i.e., air quality, noise, public utilities, and public services and facilities).

One of the primary objectives of the proposed project is to develop a mixed-use, TOD. As discussed above, the Reduced Residential Density Alternative (135 DU) would allow for a new development consisting of 135 residential units on a project site that is suited for TOD, which when combined with the existing uses would create a site with multiple land uses on a site within close proximity to public transit. While at a reduced development intensity, this alternative would still provide a mixed-use TOD that could accommodate the increasing growth in the region by providing a portion of the housing needs within the community. In addition, this alternative would still provide connections to existing public transit located adjacent to the project site. As such, this alternative would still meet some of the objectives of the proposed project.

The Reduced Residential Density Alternative (135 DU) would be in conformance with some of the objectives of the Mission Valley Community Plan, which promotes development intensities related to the planned transportation network, designated activity centers and river-related open spaces and encourages mixed-use complexes which offer environments for living, working, shopping and related activities (City of San Diego, 2013). Although this alternative provides minimal retail, the sites proximity to Fashion Valley Mall would still offer future residents an environment for living, working and shopping. In addition, this alternative would generally be in conformance with the City of Villages Strategy outlined in the City of San Diego General Plan, which promotes mixed-use villages throughout the City connected by high-quality transit (City of San Diego, 2008). While this alternative would not be considered a mixed-use village, it would still be a mixed-use development in close proximity to Fashion Valley Mall and adjacent to public transit.

This alternative would meet most of the project objectives. However, this alternative would not meet the following objectives at the same level as the proposed project because of the reduction in residential units proposed under this alternative:

- To provide a residential development that reasonably maximizes the number of residential units on the project site without exceeding the Mission Valley Planned District Ordinance Threshold 2 for Traffic District C of 417 ADT per acre and subsequently not requiring the need for a Community Plan Amendment;
- To reasonably maximize the efficiency in use of the developable land on this TOD suited site; and,
- To provide a project that is consistent with the City of Villages and Smart Growth policies, maximize residential development at an infill site, where public facilities, transit, and services are within walking distance.

**Table ES-1  
Summary of Environmental Impacts and Mitigation Measures**

Environmental Impact	Mitigation Measures	Significance After Mitigation
<b>Section 5.1 Land Use</b>		
<p>Although no significant land use impacts were identified, implementation of Mitigation Measure LU-1 would ensure that no significant land use impacts would occur, specifically with regard to the proposed project's consistency with the Multiple Species Conservation Program MHPA Land Use Adjacency Guidelines.</p>	<p><b>LU-1</b> Prior to issuance of any construction permit or notice to proceed, DSD/LDR, and/or MSCP staff shall verify the Applicant has accurately represented the project's design in or on the Construction Documents (CD's/CD's consist of Construction Plan Sets for Private Projects and Contract Specifications for Public Projects) are in conformance with the associated discretionary permit conditions and Exhibit "A", and also the City's Multiple Species Conservation Program (MSCP) Multi-Habitat Planning Area (MHPA) Land Use Adjacency Guidelines. The applicant shall provide an implementing plan and include references on/in CD's of the following:</p> <p>A. <b>Drainage</b> – All new and proposed parking lots and developed areas in and adjacent to the MHPA shall be designed so they do not drain directly into the MHPA. All developed and paved areas must prevent the release of toxins, chemicals, petroleum products, exotic plant materials prior to release by incorporating the use of filtration devices, planted swales and/or planted detention/desiltation basins, or other approved permanent methods that are designed to minimize negative impacts, such as excessive water and toxins into the ecosystems of the MHPA.</p> <p>B. <b>Toxics/Project Staging Areas/Equipment Storage</b> – Projects that use chemicals or generate by-products such as pesticides, herbicides, and animal waste, and other substances that are potentially toxic or impactful to native habitats/flora/fauna (including water) shall incorporate measures to reduce impacts caused by the application and/or drainage of such materials into the MHPA. No trash, oil, parking, or other construction/development-related material/activities</p>	<p>Less Than Significant</p>

Environmental Impact	Mitigation Measures	Significance After Mitigation
	<p>shall be allowed outside any approved construction limits. Provide a note in/on the CD's that states: <i>"All construction related activity that may have potential for leakage or intrusion shall be monitored by the Qualified Biologist/Owners Representative or Resident Engineer to ensure there is no impact to the MHPA."</i></p> <p>C. <b>Lighting</b> – Lighting within or adjacent to the MHPA shall be directed away/shielded from the MHPA and be subject to City Outdoor Lighting Regulations per LDC Section 142.0740.D. Overhead lighting shall be shielded and either have a fixed downward-aiming position or have a locking feature to fix the light in the downward position. Additionally, overhead lighting adjacent to the MHPA shall be placed on a timer to turn off from 11 pm to sunrise unless determined by the City of San Diego that overhead lighting is necessary for public safety.</p> <p>D. <b>Barriers</b> – New development within or adjacent to the MHPA shall be required to provide barriers (e.g., non-invasive vegetation; rocks/boulders; 6-foot high, vinyl-coated chain link or equivalent fences/walls; and/or signage) along the MHPA boundaries to direct public access to appropriate locations, reduce domestic animal predation, protect wildlife in the preserve, and provide adequate noise reduction where needed.</p> <p>E. <b>Invasives</b> – No invasive non-native plant species shall be introduced into areas within or adjacent to the MHPA.</p> <p>F. <b>Brush Management</b> – New development adjacent to the MHPA shall be set back from the MHPA to provide required Brush Management Zone 1 area on the building pad outside of the MHPA. Zone 2 may be located within the MHPA provided the Zone 2 management will be the responsibility of an HOA or other private entity except where narrow wildlife corridors require it to be located outside of the MHPA. Brush management zones will not be greater in size</p>	

Environmental Impact	Mitigation Measures	Significance After Mitigation
	<p>than currently required by the City's regulations, the amount of woody vegetation clearing shall not exceed 50 percent of the vegetation existing when the initial clearing is done and vegetation clearing shall be prohibited within native coastal sage scrub and chaparral habitats from March 1 - August 15 except where the City ADD/MMC has documented the thinning would be consist with the City's MSCP Subarea Plan. Existing and approved projects are subject to current requirements of Municipal Code Section 142.0412.</p> <p>G. <b>Noise</b> – Several sensitive bird species were observed during the biological fieldwork conducted by Rocks Biological Consulting, Inc. However, these species were observed offsite and not within the proposed project impact area. Generally, the Migratory Bird Treaty Act (MBTA) restricts clearing or grading between February 1 and September 15 to protect individual birds, nests, and eggs. Thus, potential impacts could occur if vegetation clearing is undertaken during the breeding season. With implementation of Mitigation Measure BR-1 as identified below and in Section 5.4 Biological Resources of this EIR, impacts would be reduced to a level of significance.</p>	
<p><b>Section 5.2 Transportation/Circulation/Parking</b></p>		
<p><b>Existing + Project Conditions</b></p>		
<p><b>Intersections</b> The proposed project has the potential to result in a significant direct impact to intersection operations at the Hotel Circle S./I-8 EB Ramps intersection (LOS F during the PM peak hour).</p>	<p>In an attempt to mitigate the project's direct impact, LLG analyzed three (3) intersection control alternatives, which include a traffic signal, roundabout and an enhanced all-way stop control per recent statewide directive (Caltrans Intersection Control Evaluation (ICE) and Design Guidance).</p> <p>Signalizing the intersection would mitigate the project's direct impact. However, based on a preliminary feasibility analysis conducted as part of the TIA, signalization of this intersection is not likely to be approved by Caltrans due to the lack of adequate off-ramp queue</p>	<p>Significant and Unavoidable</p>

Environmental Impact	Mitigation Measures	Significance After Mitigation
	<p>storage, which may pose safety and operational issues if queues backup onto the freeway mainline. Therefore, the traffic signal alternative is deemed infeasible.</p> <p>A preliminary roundabout evaluation was also conducted. Based on FHWA Guidelines, a 100 to 130 foot diameter roundabout is recommended based on the traffic volumes on Hotel Circle South. As shown in Table 5.2-14 of Section 5.2 of this EIR, the intersection would still operate at LOS F as a single lane roundabout. Additionally, given that the footprint of the roundabout encroaches on the commercial fronting properties on Hotel Circle South, the roundabout is deemed infeasible from a design and operations perspective.</p> <p>LLG also analyzed an enhanced all-way stop alternative. The enhanced all-way stop control includes a second EB through lane and restriping the WB approach to include two through lanes with a shared right-turn lane. To accommodate the additional lanes at the intersection, widening of Hotel Circle South along the existing Mission Valley Resort is required.</p> <p>The Legacy International Center (LIC) Project proposes to widen Hotel Circle South along its project frontage to include two additional travel lanes to mitigate its impact at this intersection. The Hotel Circle South / I-8 EB ramps intersection would be widened as a part of this improvement to include an additional through lane in each direction. Furthermore, the Mission Valley Community Plan Update is currently in process and the circulation element ultimate street classifications may or may not remain the same. Therefore, this impact would remain significant and unavoidable.</p> <p>In an effort to reduce this traffic impact, the Applicant shall implement Mitigation Measure T-1, which requires implementation of a Transportation Demand Management (TDM) program. See Section 5.2.3.3 for details of the identified TDM program.</p> <p><b>T-1 Transportation Demand Management Program</b></p> <p>The Applicant shall implement a TDM program using Strategies 1 and 2 (Basic + Transit) as described in Section</p>	

Environmental Impact	Mitigation Measures	Significance After Mitigation
	<p>5.2 of the EIR and the Traffic Impact Analysis prepared by Linscott, Law and Greenspan, that includes the following:</p> <ul style="list-style-type: none"> <li>• Provide a mixed-use, transit oriented development (TOD) that provides the appropriate setting for implementing TDM strategies and supports a VMT neutral project. This includes a corporate office / residential live / work development supported by on-site retail.</li> <li>• The provision of carpool / vanpool parking spaces in preferentially located areas (closest to building entrances). These spaces would be signed and striped "Carpool / Vanpool Parking Only". Information about the availability of and the means of accessing the carpool / vanpool parking spaces could be posted on Transportation Information Displays located in retail back-offices, common area or on intranets, as appropriate.</li> <li>• A pedestrian path (approximately 1,200 feet long) will be provided on the northwest corner of the site that runs along the San Diego River and connects to the existing pedestrian bridge serving the Fashion Valley Transit Center. To promote internal pedestrian circulation, sidewalks are also proposed throughout the site connecting the various uses.</li> <li>• The provision of a charging station(s) for electric vehicles.</li> <li>• The project will coordinate with local transit operators to provide input on how and when routes should be implemented to serve the area.</li> <li>• Transportation information will be displayed in common areas to include, at a minimum, the following materials: <ul style="list-style-type: none"> <li>○ Ridesharing promotional materials, including the iCommute program.</li> </ul> </li> </ul>	

Environmental Impact	Mitigation Measures	Significance After Mitigation
	<ul style="list-style-type: none"> <li>○ Promotional materials for “Guaranteed Ride Home” programs like those provided by iCommute to ensure that residents / employees that carpool, vanpool, take transit, walk, or bike to work are provided with a ride to their home or location near their residence in the event that an emergency occurs during their work day.</li> <li>○ Bicycle route and parking including maps and bicycle safety information.</li> <li>○ Materials publicizing internet and telephone numbers for referrals on transportation information.</li> <li>○ Promotional materials provided by MTS and other publically supported transportation organizations.</li> <li>○ A listing of facilities at the site for carpools / vanpoolers, transit riders, bicyclists, and pedestrians, including information on the availability of preferential carpool / vanpool parking spaces and the methods for obtaining these spaces.</li> <li>• Participation in the MTS’s three-month pilot Eco Pass program, which provides reduced cost monthly passes according to a tiered-discount structure based on the annual volume of passes used.</li> <li>• Annual events will be held to promote the use of alternative transportation.</li> <li>• Bicycle racks will be provided for resident and / or retail employee use.</li> <li>• The UT project will provide flexible work schedules</li> </ul>	

Environmental Impact	Mitigation Measures	Significance After Mitigation
	<p>to stagger arrivals and departures of employees.</p> <p>In addition, post-occupancy, the Applicant shall ensure the proposed TDM strategies are adequately implemented by conducting a TDM Monitoring and Reporting Program. The TDM Monitoring and Reporting Program would quantify the net reduction in project trips. The Monitoring efforts will include conducting ADT counts and peak hour counts at the project site. Data relating to transit usage, carpool/vanpool usage, transit and other subsidies will also be collected and will be supplemented by on-site surveys. The Applicant shall conduct the monitoring program every year for a period of five years. A TDM Monitoring Report shall be prepared every year and submitted to the satisfaction of the City Engineer.</p> <p>The TDM is expected to result in a trip reduction of 85 daily trips (7.5% of the total project trips). A TDM Monitoring and Reporting Program will be conducted to ensure that the proposed TDM strategies are adequately implemented.</p> <p>Implementation of Mitigation Measure T-1 will result in some trip reduction but will not mitigate the impact at this intersection to a level of less than significant. With implementation of the proposed project and Mitigation Measure T-1, the significant and unavoidable impacts to this intersection would remain.</p>	
<p><b>Street Segments</b> The proposed project has the potential to result in significant direct impacts to street segment operations at the following segments:</p>		
<ul style="list-style-type: none"> <li>Hotel Circle N.: I-8 WB Ramps to Fashion Valley Road (LOS F)</li> </ul>	<p>Widening this segment to 4-lane Collector standards to accommodate a second WB through lane would mitigate the project's significant impact. The widening could occur on the north side of Hotel Circle North to include two westbound lanes and two</p>	<p>Significant and Unavoidable</p>

Environmental Impact	Mitigation Measures	Significance After Mitigation
	<p>eastbound lanes. To implement this mitigation, approximately 35' of widening would be required on the existing Riverwalk Golf Course. The Mission Valley Community Plan Update is currently in process and the circulation element ultimate street classifications may or may not remain the same. Therefore, the proposed project will not implement this improvement and impacts along this street segment would remain significant and unavoidable.</p> <p>In an effort to reduce this traffic impact, the Applicant shall implement Mitigation Measure T-1 described above, which requires implementation of a TDM program. See Section 5.2.3.3 of this EIR for details of the identified TDM program.</p> <p>Implementation of Mitigation Measure T-1 will result in some trip reduction but will not mitigate the impact at this street segment to a level of less than significant. With implementation of the proposed project and Mitigation Measure T-1, the significant and unavoidable impacts to this street segment would remain.</p>	
<ul style="list-style-type: none"> <li>Hotel Circle N.: Fashion Valley Road to Camino De La Reina (LOS E)</li> </ul>	<p>Widening this segment to 3-lane Collector standards to accommodate a second WB through lane would mitigate the project's significant impact. The widening could occur on the north side of Hotel Circle North that would include two westbound lanes and one eastbound lane plus a two-way left-turn lane. To implement this mitigation, approximately 12' of widening would be required on the existing Town &amp; Country Resort property. The Mission Valley Community Plan Update is currently in process and the circulation element ultimate street classifications may or may not remain the same. Therefore, the proposed project will not implement this improvement and impacts along this street segment would remain significant and unavoidable.</p> <p>In an effort to reduce this traffic impact, the Applicant shall implement Mitigation Measure T-1 described above, which requires implementation of a TDM program. See Section 5.2.3.3 of this EIR for details of the identified TDM program.</p> <p>Implementation of Mitigation Measure T-1 will result in some trip reduction but will not mitigate the impact at this street segment to a</p>	<p>Significant and Unavoidable</p>

Environmental Impact	Mitigation Measures	Significance After Mitigation
	<p>level of less than significant. With implementation of the proposed project and Mitigation Measure T-1, the significant and unavoidable impacts to this street segment would remain.</p>	
<ul style="list-style-type: none"> <li>Hotel Circle S.: I-8 EB Ramps to Bachman Place (LOS F)</li> </ul>	<p>Widening this segment to 3-lane Collector standards plus a two-way left-turn lane would mitigate the project's significant impact. The widening would include two eastbound lanes and one westbound lane. There is an existing 30' IOD on Hotel Circle South along this roadway segment. Based on a preliminary feasibility analysis conducted as part of the TIA, this widening is deemed infeasible due to building structures fronting Hotel Circle South that would allow only a 2' parkway, which is not sufficient to include a sidewalk per City standards. Therefore, this mitigation cannot be implemented and impacts along this street segment would remain significant and unavoidable.</p> <p>In an effort to reduce this traffic impact, the Applicant shall implement Mitigation Measure T-1 described above, which requires implementation of a TDM program to partially mitigate the project's impact at this location. See Section 5.2.3.3 of this EIR for details of the identified TDM program.</p> <p>Implementation of Mitigation Measure T-1 will result in some trip reduction but will not mitigate the impact at this street segment to a level of less than significant. With implementation of the proposed project and Mitigation Measure T-1, the significant and unavoidable impacts to this street segment would remain.</p>	<p>Significant and Unavoidable</p>
<ul style="list-style-type: none"> <li>Hotel Circle S.: Bachman Place to Camino De La Reina (LOS F)</li> </ul>	<p>Widening this segment to 3-lane Collector standards plus a continuous left-turn lane would mitigate the project's significant impact. The widening would include two eastbound lanes and one westbound lane. Based on a preliminary feasibility analysis conducted as part of the TIA, this widening is deemed infeasible due to the location of the support columns for the I-8 undercrossing on Hotel Circle South. Therefore, this mitigation cannot be implemented and impacts along this street segment would remain significant and unavoidable.</p> <p>In an effort to reduce this traffic impact, the Applicant shall implement</p>	<p>Significant and Unavoidable</p>

Environmental Impact	Mitigation Measures	Significance After Mitigation
	<p>Mitigation Measure T-1 described above, which requires implementation of a TDM program. See Section 5.2.3.3 of this EIR for details of the identified TDM program.</p> <p>Implementation of Mitigation Measure T-1 will result in some trip reduction but will not mitigate the impact at this street segment to a level of less than significant. With implementation of the proposed project and Mitigation Measure T-1, the significant and unavoidable impacts to this street segment would remain.</p>	
<b><i>Near-Term (Opening Day 2017) Conditions</i></b>		
<p><b><u>Intersections</u></b></p> <p>The proposed project has the potential to result in significant direct impacts to intersection operations at the Hotel Circ S./I-8EB Ramps intersection (LOS F during the PM peak hour) in the Near-Term (Opening Day 2017) Conditions.</p>	<p>To mitigate the project’s direct impact, LLG analyzed three (3) intersection control alternatives, which include a traffic signal, roundabout and an enhanced all-way stop control per recent statewide directive (Caltrans Intersection Control Evaluation (ICE) and Design Guidance).</p> <p>Signalizing the intersection would mitigate the project’s direct impact. However, based on a preliminary feasibility analysis conducted as part of the TIA, signalization of this intersection is not likely to be approved by Caltrans due to the lack of adequate off-ramp queue storage, which may pose safety and operational issues if queues backup onto the freeway mainline. Therefore, the traffic signal alternative is deemed infeasible.</p> <p>A preliminary roundabout evaluation was also conducted. Based on FHWA Guidelines, a 100 to 130 foot diameter roundabout is recommended based on the traffic volumes on Hotel Circle South. As shown in Table 5.2-18, the intersection would still operate at LOS F as a single lane roundabout. Additionally, given that the footprint of the roundabout encroaches on the commercial fronting properties on Hotel Circle South, the roundabout is deemed infeasible from a design and operations perspective.</p> <p>LLG also analyzed an enhanced all-way stop alternative. The enhanced all-way stop control includes a second EB through lane and restriping the WB approach to include two through lanes with a shared right-turn lane. To accommodate the additional lanes at the intersection, widening of Hotel Circle South along the existing Mission Valley Resort is required.</p>	<p>Significant and Unavoidable</p>

Environmental Impact	Mitigation Measures	Significance After Mitigation
	<p>The Legacy International Center (LIC) Project proposes to widen Hotel Circle South along its project frontage to include two additional travel lanes to mitigate its impact at this intersection. The Hotel Circle South / I-8 EB ramps intersection would be widened as a part of this improvement to include an additional through lane in each direction. Furthermore, the Mission Valley Community Plan Update is currently in process and the circulation element ultimate street classifications may or may not remain the same. Therefore, this impact would remain significant and unavoidable.</p> <p>In an effort to reduce this traffic impact, the Applicant shall implement Mitigation Measure T-1 described above, which requires implementation of a TDM program. See Section 5.2.3.3 of this EIR for details of the identified TDM program.</p> <p>Implementation of Mitigation Measure T-1 will result in some trip reduction but will not mitigate the impact at this intersection to a level of less than significant. With implementation of the proposed project and Mitigation Measure T-1, the significant and unavoidable impacts to this intersection would remain.</p>	
<p><b><u>Street Segments</u></b></p> <p>The proposed project has the potential to result in significant direct impacts to street segment operations at the following segments in the Near-Term (Opening Day 2017) Conditions:</p>		
<ul style="list-style-type: none"> <li>Hotel Circle N.: I-8 WB Ramps to Fashion Valley Road (LOS F)</li> </ul>	<p>Widening this segment to 4-lane Collector standards to accommodate a second WB through lane would mitigate the project's significant impact. The widening could occur on the north side of Hotel Circle North to include two westbound lanes and two eastbound lanes. To implement this mitigation, approximately 35' of widening would be required on the existing Riverwalk Golf Course. The Mission Valley Community Plan Update is currently in process and the circulation element ultimate street classifications may or may not remain the same. Therefore, the proposed project will not</p>	<p>Significant and Unavoidable</p>

Environmental Impact	Mitigation Measures	Significance After Mitigation
	<p>implement this improvement and impacts along this street segment would remain significant and unavoidable.</p> <p>In an effort to reduce this traffic impact, the Applicant shall implement Mitigation Measure T-1 described above, which requires implementation of a TDM program. See Section 5.2.3.3 of this EIR for details of the identified TDM program.</p> <p>Implementation of Mitigation Measure T-1 will result in some trip reduction but will not mitigate the impact at this street segment to a level of less than significant. With implementation of the proposed project and Mitigation Measure T-1, the significant and unavoidable impacts to this street segment would remain.</p>	
<ul style="list-style-type: none"> <li>Hotel Circle N.: Fashion Valley Road to Camino De La Reina (LOS E)</li> </ul>	<p>Widening this segment to 3-lane Collector standards to accommodate a second WB through lane would mitigate the project's significant impact. The widening could occur on the north side of Hotel Circle North that would include two westbound lanes and one eastbound lane plus a two-way left-turn lane. To implement this mitigation, approximately 12' of widening would be required on the existing Town &amp; Country Resort property. The Mission Valley Community Plan Update is currently in process and the circulation element ultimate street classifications may or may not remain the same. Therefore, the proposed project will not implement this improvement and impacts along this street segment would remain significant and unavoidable.</p> <p>In an effort to reduce this traffic impact, the Applicant shall implement Mitigation Measure T-1 described above, which requires implementation of a TDM program. See Section 5.2.3.3 of this EIR for details of the identified TDM program.</p> <p>Implementation of Mitigation Measure T-1 will result in some trip reduction but will not mitigate the impact at this street segment to a level of less than significant. With implementation of the proposed project and Mitigation Measure T-1, the significant and unavoidable impacts to this street segment would remain.</p>	<p>Significant and Unavoidable</p>

Environmental Impact	Mitigation Measures	Significance After Mitigation
<ul style="list-style-type: none"> <li>Hotel Circle S.: I-8 EB Ramps to Bachman Place (LOS E)</li> </ul>	<p>Widening this segment to 3-lane Collector standards plus a two-way left-turn lane would mitigate the project's significant impact. The widening would include two eastbound lanes and one westbound lane. There is an existing 30' IOD on Hotel Circle South along this roadway segment. Based on a preliminary feasibility analysis conducted as part of the TIA, this widening is deemed infeasible due to building structures fronting Hotel Circle South that would allow only a 2' parkway, which is not sufficient to include a sidewalk per City standards. Therefore, this mitigation cannot be implemented and impacts along this street segment would remain significant and unavoidable.</p> <p>In an effort to reduce this traffic impact, the Applicant shall implement Mitigation Measure T-1 described above, which requires implementation of a TDM program. See Section 5.2.3.3 of this EIR for details of the identified TDM program.</p> <p>Implementation of Mitigation Measure T-1 will result in some trip reduction but will not mitigate the impact at this street segment to a level of less than significant. With implementation of the proposed project and Mitigation Measure T-1, the significant and unavoidable impacts to this street segment would remain.</p>	<p>Significant and Unavoidable</p>
<ul style="list-style-type: none"> <li>Hotel Circle S.: Bachman Place to Camino De La Reina (LOS E)</li> </ul>	<p>Widening this segment to 3-lane Collector standards plus a two-way left-turn lane would mitigate the project's significant impact. The widening would include two eastbound lanes and one westbound lane. There is an existing 30' IOD on Hotel Circle South along this roadway segment. Based on a preliminary feasibility analysis conducted as part of the TIA, this widening is deemed infeasible due to the location of the support columns for the I-8 undercrossing on Hotel Circle South. Therefore, this mitigation cannot be implemented and impacts along this street segment would remain significant and unavoidable.</p> <p>In an effort to reduce this traffic impact, the Applicant shall implement Mitigation Measure T-1 described above, which requires implementation of a TDM program. See Section 5.2.3.3 of this EIR for details of the identified TDM program.</p>	<p>Significant and Unavoidable</p>

Environmental Impact	Mitigation Measures	Significance After Mitigation
	Implementation of Mitigation Measure T-1 will result in some trip reduction but will not mitigate the impact at this street segment to a level of less than significant. With implementation of the proposed project and Mitigation Measure T-1, the significant and unavoidable impacts to this street segment would remain.	
<b>Horizon Year (Year 2035) + Project Conditions</b>		
<p><b>Intersections</b></p> <p>The proposed project has the potential to result in significant cumulative impacts to intersection operations at the Hotel Circle S./I-8 EB Ramps intersection (LOS F during the AM and PM peak hour).</p>	<p><b>CUM-1</b> Prior to issuance of the first building permit, the Owner/Permittee shall contribute a fair-share (4.3%) towards implementing the widening of the Hotel Circle South/I-8 EB Ramps intersection to include a second EB through lane and restriping the WB approach to include two through lanes with a shared right-turn lane, satisfactory to the City Engineer.</p>	Less Than Significant
<p><b>Street Segments</b></p> <p>The proposed project has the potential to result in significant cumulative impacts to street segment operations at the following segments in the Horizon Year (Year 2035) + Project Conditions:</p>		
<ul style="list-style-type: none"> <li>Camino De La Reina: Hotel Circle to Project Driveway (LOS F)</li> </ul>	<p><b>CUM-2</b> The Applicant shall provide an irrevocable offer of dedication (IOD) and deferred improvement agreement (DIA) for the widening of Camino De La Reina along the project frontage. If this section of Camino De La Reina remains a 4-lane Major classification after approval of the Mission Valley Community Plan Update, the applicant's widening of the roadway to half width of a 4-lane Major would mitigate the project's cumulative impact once the widening is completed. In addition, the project also proposes to contribute a fair-share (16.1%) towards restriping with potential widening (to account for appropriate transitions) of Camino De La Reina to 3-lane Collector standards between the southerly UT property line and Hotel Circle. Provision of the IOD, DIA and payment of the fair-share will mitigate the cumulative impact along this</p>	Less Than Significant

Environmental Impact	Mitigation Measures	Significance After Mitigation
<ul style="list-style-type: none"> <li>Camino De La Reina: Project Driveway to Avenida Del Rio (LOS F)</li> </ul>	<p>segment.</p> <p><b>CUM-3</b> The Applicant shall provide an IOD and DIA for the widening of Camino De La Reina along the project frontage. If this section of Camino De La Reina remains a 4-lane Major classification after approval of the Mission Valley Community Plan Update, the applicant's widening of the roadway to half width of a 4-lane Major would mitigate the project's cumulative impact once the widening is completed. In addition, the project also proposes to contribute a fair-share (5.4%) towards widening Camino De La Reina between UT northerly property line and Avenida Del Rio to 3-lane Collector (half width of a 4-lane Major) standards. Provision of the IOD, DIA and payment of the fair-share will mitigate the cumulative impact along this segment.</p>	<p>Less Than Significant</p>
<ul style="list-style-type: none"> <li>Hotel Circle N.: I-8 WB Ramps to Fashion Valley Road (LOS F)</li> </ul>	<p><b>CUM-4</b> Prior to issuance of the first building permit, the Owner/Permittee shall contribute a fair-share (2.4%) towards widening to accommodate a second WB through lane on Hotel Circle North between I-8 WB Ramps and Fashion Valley Road, satisfactory to the City Engineer.</p>	<p>Less Than Significant</p>
<ul style="list-style-type: none"> <li>Hotel Circle N.: Fashion Valley Road to Camino De La Reina (LOS F)</li> </ul>	<p><b>CUM-5</b> Prior to issuance of the first building permit, the Owner/Permittee shall contribute a fair-share (4.2%) towards widening to accommodate a second WB through lane on Hotel Circle North between Fashion Valley Road and Camino De La Reina, satisfactory to the City Engineer.</p>	<p>Less Than Significant</p>
<ul style="list-style-type: none"> <li>Hotel Circle S.: I-8 EB Ramps to Bachman Place (LOS F)</li> </ul>	<p>Widening this segment to 3-lane Collector standards plus a two-way left-turn lane would mitigate the project's significant impact. The widening would include two eastbound lanes and one westbound lane. There is an existing 30' IOD on Hotel Circle South along this roadway segment. Based on a preliminary feasibility analysis conducted as part of the TIA, this widening is deemed infeasible from a technical (physical) standpoint due to building structures fronting Hotel Circle South that would allow only a 2' parkway, which is not sufficient to include a sidewalk per City standards. Therefore, given the physical infeasibility of the proposed mitigation, this impact is considered cumulatively significant and unmitigated.</p>	<p>Cumulatively Significant and Unmitigated</p>

Environmental Impact	Mitigation Measures	Significance After Mitigation
	<p>In an effort to reduce this traffic impact, the Applicant shall implement Mitigation Measure T-1 described above, which requires implementation of a TDM program. See Section 5.2.3.3 of this EIR for details of the identified TDM program.</p> <p>Implementation of Mitigation Measure T-1 will result in some trip reduction but will not mitigate the impact at this street segment to a level of less than significant. With implementation of the proposed project and Mitigation Measure T-1, the cumulatively significant and unavoidable impacts to this street segment would remain.</p>	
<ul style="list-style-type: none"> <li>Hotel Circle S.: Bachman Place to Camino De La Reina (LOS F)</li> </ul>	<p>Widening this segment to a 3-lane Collector standards plus a continuous left-turn lane would mitigate the project's significant impact. The widening would include two eastbound lanes and one westbound lane. Based on a preliminary feasibility analysis conducted as part of the TIA, this widening is deemed technically (physical) infeasible due to the location of the support columns for the I-8 undercrossing on Hotel Circle South. Therefore, given the physical infeasibility of the proposed mitigation, this impact is considered cumulatively significant and unmitigated.</p> <p>In an effort to reduce this traffic impact, the Applicant shall implement Mitigation Measure T-1 described above, which requires implementation of a TDM program. See Section 5.2.3.3 of this EIR for details of the identified TDM program.</p> <p>Implementation of Mitigation Measure T-1 will result in some trip reduction but will not mitigate the impact at this street segment to a level of less than significant. With implementation of the proposed project and Mitigation Measure T-1, the cumulatively significant and unavoidable impacts to this street segment would remain.</p>	<p>Cumulatively Significant and Unmitigated</p>
<p><b>Section 5.4 Biological Resources</b></p>		
<p>The proposed project has the potential to result in indirect impacts to adjacent sensitive habitat communities as a result of potentially invasive landscaping.</p>	<p>Refer to Mitigation Measure <b>LU-1</b> above.</p>	<p>Less Than Significant</p>

Environmental Impact	Mitigation Measures	Significance After Mitigation
<p>The proposed project has the potential to impact birds protected under the MBTA nesting in eucalyptus trees located on the project site.</p>	<p><b>BR-1</b> In order to comply with the Federal Migratory Bird Treaty Act, and CA Department of Fish and Wildlife (CDFW) Code (which essentially prohibits any take of bird species, including disturbance of eggs, fledglings, nests, or plants/substrate the nest is located in, or causing adults to abandon nests), the project biologist shall verify that no nesting birds are present on any portion of the project site or nearby vicinity (including off-site areas to be impacted) during grading and construction operations that would be disturbed indirectly or directly by the project, especially during the typical bird breeding season between February 1 and September 15. If vegetation clearing/tree removal is during the typical bird breeding season or an active nest is noted, the project biologist shall conduct a preconstruction survey for active nests in the development area and submit a letter report to the City Development Services' Mitigation Monitoring Coordination (MMC) section prior to the preconstruction meeting. If surveys show that nesting birds are present, construction shall be delayed until the end of the breeding season or until surveys by a qualified biologist confirm that fledglings are no longer dependent on nest, or the Project biologist shall work with the City's Development Services Mitigation Monitoring Coordination (MMC) group and the appropriate wildlife agencies (i.e. USFWS and CDFW) to determine appropriate avoidance and/or other mitigation.</p>	<p>Less Than Significant</p>
<p><b>Section 5.5 Geologic Conditions</b></p>		
<p>The proposed project has the potential to expose people or property to geologic hazards, including strong seismic shaking, liquefaction, lateral spread, flow slide, seismically induced settlement, and shallow groundwater.</p>	<p><b>GC-1</b> The proposed project shall incorporate the geotechnical recommendations identified in the comprehensive geotechnical investigation report required by the SDMC into the final design of the proposed project. The mitigation of liquefiable soils will likely be necessary for settlement-sensitive structures. The type and extent of mitigation is dependent upon the type and location of structures on the final design plan. Several alternatives are available for mitigation including deep foundations, ground improvements, and structural mitigations. Deep foundations</p>	<p>Less Than Significant</p>

Environmental Impact	Mitigation Measures	Significance After Mitigation
	<p>will most likely be recommended to provide structural mitigation of soil liquefaction for the planned residential buildings. Ground improvement (stone columns) and/or a mat slab foundation is/are recommended for the proposed parking structure. Ground improvement should extend at least 15-feet laterally outside to the edge of the planned building structure, where practical. Ground improvement (stone columns) will most likely be recommended to mitigate lateral spread potential along the northern property line. The selection of the type of mitigation and performance standards will depend on the final building plans and building loads.</p>	
<b>Section 5.6 Historical Resources</b>		
<p>The proposed project has the potential to result in significant impacts to sensitive archaeological resources potentially located on the project site.</p>	<p><b>HR-1 I. Prior to Permit Issuance</b></p> <p>A. Entitlements Plan Check</p> <ol style="list-style-type: none"> <li>1. Prior to Notice to Proceed (NTP) for any construction permits, including but not limited to, the first Grading Permit, Demolition Plans/Permits and Building Plans/Permits, but prior to the first preconstruction meeting, whichever is applicable, the Assistant Deputy Director (ADD) Environmental designee shall verify that the requirements for Archaeological Monitoring and Native American monitoring have been noted on the appropriate construction documents.</li> </ol> <p>B. Letters of Qualification have been submitted to ADD</p> <ol style="list-style-type: none"> <li>1. The applicant shall submit a letter of verification to Mitigation Monitoring Coordination (MMC) identifying the Principal Investigator (PI) for the project and the names of all persons involved in the archaeological monitoring program, as</li> </ol>	<p>Less Than Significant</p>

Environmental Impact	Mitigation Measures	Significance After Mitigation
	<p>defined in the City of San Diego Historical Resources Guidelines (HRG). If applicable, individuals involved in the archaeological monitoring program must have completed the 40-hour HAZWOPER training with certification documentation.</p> <ol style="list-style-type: none"> <li>2. MMC will provide a letter to the applicant confirming the qualifications of the PI and all persons involved in the archaeological monitoring of the project.</li> <li>3. Prior to the start of work, the applicant must obtain approval from MMC for any personnel changes associated with the monitoring program.</li> </ol> <p><b>II. Prior to Start of Construction</b></p> <p>A. Verification of Records Search</p> <ol style="list-style-type: none"> <li>1. The PI shall provide verification to MMC that a site-specific records search (1/4 mile radius) has been completed. Verification includes, but is not limited to a copy of a confirmation letter from South Coast Information Center, or, if the search was in-house, a letter of verification from the PI stating that the search was completed.</li> <li>2. The letter shall introduce any pertinent information concerning expectations and probabilities of discovery during trenching and/or grading activities.</li> <li>3. The PI may submit a detailed letter to MMC requesting a reduction to the 1/4 mile radius.</li> </ol> <p>B. PI Shall Attend Precon Meetings</p> <ol style="list-style-type: none"> <li>1. Prior to beginning any work that requires monitoring; the Applicant shall arrange a Precon Meeting that shall include the PI,</li> </ol>	

Environmental Impact	Mitigation Measures	Significance After Mitigation
	<p>Construction Manager (CM) and/or Grading Contractor, Resident Engineer (RE), Building Inspector (BI), if appropriate, and MMC. The qualified Archaeologist and Native American Monitor shall attend any grading/excavation related Precon Meetings to make comments and/or suggestions concerning the Archaeological Monitoring program with the Construction Manager and/or Grading Contractor.</p> <p>a. If the PI is unable to attend the Precon Meeting, the Applicant shall schedule a focused Precon Meeting with MMC, the PI, RE, CM or BI, if appropriate, prior to the start of any work that requires monitoring.</p> <p>2. Identify Areas to be Monitored</p> <p>a. Prior to the start of any work that requires monitoring, the PI shall submit an Archaeological Monitoring Exhibit (AME) based on the appropriate construction documents (reduced to 11x17) to MMC identifying the areas to be monitored including the delineation of grading/excavation limits.</p> <p>b. The AME shall be based on the results of a site-specific records search as well as information regarding existing known soil conditions (native or formation).</p> <p>3. When Monitoring Will Occur</p> <p>a. Prior to the start of any work, the PI shall also submit a construction schedule to MMC through the RE indicating when and where monitoring will occur.</p>	

Environmental Impact	Mitigation Measures	Significance After Mitigation
	<p>b. The PI may submit a detailed letter to MMC prior to the start of work or during construction requesting a modification to the monitoring program. This request shall be based on relevant information such as review of final construction documents, which indicate site conditions such as depth of excavation and/or site graded to bedrock, etc., which may reduce or increase the potential for resources to be present.</p> <p><b>III. During Construction</b></p> <p>A. Monitor(s) Shall be Present During Grading/Excavation/Trenching</p> <ol style="list-style-type: none"> <li>1. The Archaeological Monitor shall be present fulltime during grading/excavation/trenching activities, which could result in impacts to archaeological resources as identified on the AME. The Native American monitor shall determine the extent of their presence during construction related activities based on the AME and provide that information to the PI and MMC. <b>The Construction Manager is responsible for notifying the RE, PI, and MMC of changes to any construction activities.</b></li> <li>2. The monitor shall document field activity via the Consultant Site Visit Record (CSV). The CSV's shall be faxed by the CM to the RE the first day of monitoring, the last day of monitoring, monthly (<b>Notification of Monitoring Completion</b>), and in the case of ANY discoveries. The RE shall forward copies to MMC.</li> <li>3. The PI may submit a detailed letter to MMC during construction requesting a</li> </ol>	

Environmental Impact	Mitigation Measures	Significance After Mitigation
	<p>modification to the monitoring program when a field condition such as modern disturbance post-dating the previous grading/trenching activities, presence of fossil formations, or when native soils are encountered may reduce or increase the potential for resources to be present.</p> <p>B. Discovery Notification Process</p> <ol style="list-style-type: none"> <li>1. In the event of a discovery, the Archaeological Monitor shall direct the contractor to temporarily divert trenching activities in the area of discovery and immediately notify the RE or BI, as appropriate.</li> <li>2. The Monitor shall immediately notify the PI (unless Monitor is the PI) of the discovery.</li> <li>3. The PI shall immediately notify MMC by phone of the discovery, and shall also submit written documentation to MMC within 24 hours by fax or email with photos of the resource in context, if possible.</li> </ol> <p>C. Determination of Significance</p> <ol style="list-style-type: none"> <li>1. The PI and Native American monitor shall evaluate the significance of the resource. If Human Remains are involved, follow protocol in Section IV below.               <ol style="list-style-type: none"> <li>a. The PI shall immediately notify MMC by phone to discuss significance determination and shall also submit a letter to MMC indicating whether additional mitigation is required.</li> <li>b. If the resource is significant, the PI shall submit an Archaeological Data Recovery Program (ADRP) and obtain written approval from MMC. Impacts to significant resources must be mitigated</li> </ol> </li> </ol>	

Environmental Impact	Mitigation Measures	Significance After Mitigation
	<p>before ground-disturbing activities in the area of discovery will be allowed to resume.</p> <p>c. If resource is not significant, the PI shall submit a letter to MMC indicating that artifacts will be collected, curated, and documented in the Final Monitoring Report. The letter shall also indicate that that no further work is required.</p> <p><b>IV. Discovery of Human Remains</b></p> <p>If human remains are discovered, work shall halt in that area and the following procedures as set forth in the California Public Resources Code (Sec. 5097.98) and State Health and Safety Code (Sec. 7050.5) shall be undertaken:</p> <p>A. Notification</p> <ol style="list-style-type: none"> <li>1. Archaeological Monitor shall notify the RE or BI as appropriate, MMC, and the PI, if the Monitor is not qualified as a PI. MMC will notify the appropriate Senior Planner in the Environmental Analysis Section (EAS).</li> <li>2. The PI shall notify the Medical Examiner after consultation with the RE, either in person or via telephone.</li> </ol> <p>B. Isolate discovery site</p> <ol style="list-style-type: none"> <li>1. Work shall be directed away from the location of the discovery and any nearby area reasonably suspected to overlay adjacent human remains until a determination can be made by the Medical Examiner in consultation with the PI concerning the provenience of the remains.</li> <li>2. The Medical Examiner, in consultation with the PI, will determine the need for a field</li> </ol>	

Environmental Impact	Mitigation Measures	Significance After Mitigation
	<p>examination to determine the provenience.</p> <p>3. If a field examination is not warranted, the Medical Examiner will determine with input from the PI, if the remains are or are most likely to be of Native American origin.</p> <p>C. If Human Remains <b>ARE</b> determined to be Native American</p> <p>1. The Medical Examiner will notify the Native American Heritage Commission (NAHC) within 24 hours. By law, <b>ONLY</b> the Medical Examiner can make this call.</p> <p>2. NAHC will immediately identify the person or persons determined to be the Most Likely Descendent (MLD) and provide contact information.</p> <p>3. The MLD will contact the PI within 24 hours or sooner after the Medical Examiner has completed coordination, to begin the consultation process in accordance with the California Public Resource and Health &amp; Safety Codes.</p> <p>4. The MLD will have 48 hours to make recommendations to the property owner or representative, for the treatment or disposition with proper dignity, of the human remains and associated grave goods.</p> <p>5. Disposition of Native American Human Remains shall be determined between the MLD and the PI, IF:</p> <p>a. The NAHC is unable to identify the MLD, OR the MLD failed to make a recommendation within 48 hours after being notified by the Commission; OR;</p> <p>b. The landowner or authorized</p>	

Environmental Impact	Mitigation Measures	Significance After Mitigation
	<p>representative rejects the recommendation of the MLD and mediation in accordance with PRC 5097.94 (k) by the NAHC fails to provide measures acceptable to the landowner.</p> <p>c. In order to protect these sites, the Landowner shall do one or more of the following:</p> <ul style="list-style-type: none"> <li>(1) Record the site with the NAHC;</li> <li>(2) Record an open space or conservation easement on the site;</li> <li>(3) Record a document with the County.</li> </ul> <p>d. Upon the discovery of multiple Native American human remains during a ground disturbing land development activity, the landowner may agree that additional conferral with descendants is necessary to consider culturally appropriate treatment of multiple Native American human remains. Culturally appropriate treatment of such a discovery may be ascertained from review of the site utilizing cultural and archaeological standards. Where the parties are unable to agree on the appropriate treatment measures the human remains and buried with Native American human remains shall be reinterred with appropriate dignity, pursuant to Section 5.c., above.</p> <p>D. If Human Remains are <b>NOT</b> Native American</p> <ul style="list-style-type: none"> <li>1. The PI shall contact the Medical Examiner and notify them of the historic era context of the burial.</li> <li>2. The Medical Examiner will determine the</li> </ul>	

Environmental Impact	Mitigation Measures	Significance After Mitigation
	<p>appropriate course of action with the PI and City staff (PRC 5097.98).</p> <p>3. If the remains are of historic origin, they shall be appropriately removed and conveyed to the Museum of Man for analysis. The decision for internment of the human remains shall be made in consultation with MMC, EAS, the applicant/landowner and the Museum of Man</p> <p><b>V. Night and/or Weekend Work</b></p> <p>A. If night and/or weekend work is included in the contract</p> <p>1. When night and/or weekend work is included in the contract package, the extent and timing shall be presented and discussed at the precon meeting.</p> <p>2. The following procedures shall be followed.</p> <p>a. No Discoveries In the event that no discoveries were encountered during night and/or weekend work, the PI shall record the information on the CSV and submit to MMC via fax by 8AM of the next business day.</p> <p>b. Discoveries All discoveries shall be processed and documented using the existing procedures detailed in Sections III - During Construction, and IV – Discovery of Human Remains.</p> <p>c. Potentially Significant Discoveries If the PI determines that a potentially significant discovery has been made, the procedures detailed under Section III - During Construction shall be followed.</p> <p>d. The PI shall immediately contact MMC, or</p>	

Environmental Impact	Mitigation Measures	Significance After Mitigation
	<p style="text-align: center;">by 8AM of the next business day to report and discuss the findings as indicated in Section III-B, unless other specific arrangements have been made.</p> <p>B. If night and/or weekend work becomes necessary during the course of construction</p> <ol style="list-style-type: none"> <li>1. The Construction Manager shall notify the RE, or BI, as appropriate, a minimum of 24 hours before the work is to begin.</li> <li>2. The RE, or BI, as appropriate, shall notify MMC immediately.</li> </ol> <p>C. All other procedures described above shall apply, as appropriate.</p> <p><b>VI. Post Construction</b></p> <p>A. Preparation and Submittal of Draft Monitoring Report</p> <ol style="list-style-type: none"> <li>1. The PI shall submit two copies of the Draft Monitoring Report (even if negative), prepared in accordance with the Historical Resources Guidelines (Appendix C/D) which describes the results, analysis, and conclusions of all phases of the Archaeological Monitoring Program (with appropriate graphics) to MMC for review and approval within 90 days following the completion of monitoring,               <ol style="list-style-type: none"> <li>a. For significant archaeological resources encountered during monitoring, the Archaeological Data Recovery Program shall be included in the Draft Monitoring Report.</li> <li>b. Recording Sites with State of California Department of Parks and Recreation                    The PI shall be responsible for recording (on the appropriate State of California Department of Park and Recreation forms-DPR 523 A/B) any significant or potentially significant resources encountered during the</li> </ol> </li> </ol>	

Environmental Impact	Mitigation Measures	Significance After Mitigation
	<p>Archaeological Monitoring Program in accordance with the City's Historical Resources Guidelines, and submittal of such forms to the South Coastal Information Center with the Final Monitoring Report.</p> <ol style="list-style-type: none"> <li>2. MMC shall return the Draft Monitoring Report to the PI for revision or, for preparation of the Final Report.</li> <li>3. The PI shall submit revised Draft Monitoring Report to MMC for approval.</li> <li>4. MMC shall provide written verification to the PI of the approved report.</li> <li>5. MMC shall notify the RE or BI, as appropriate, of receipt of all Draft Monitoring Report submittals and approvals.</li> </ol> <p>B. Handling of Artifacts</p> <ol style="list-style-type: none"> <li>1. The PI shall be responsible for ensuring that all cultural remains collected are cleaned and catalogued</li> <li>2. The PI shall be responsible for ensuring that all artifacts are analyzed to identify function and chronology as they relate to the history of the area; that faunal material is identified as to species; and that specialty studies are completed, as appropriate.</li> <li>3. The cost for curation is the responsibility of the property owner.</li> </ol> <p>C. Curation of artifacts: Accession Agreement and Acceptance Verification</p> <ol style="list-style-type: none"> <li>1. The PI shall be responsible for ensuring that all artifacts associated with the survey, testing and/or data recovery for this project are permanently curated with an appropriate institution. This shall be completed in consultation with MMC and the</li> </ol>	

Environmental Impact	Mitigation Measures	Significance After Mitigation
	<p>Native American representative, as applicable.</p> <p>2. The PI shall include the Acceptance Verification from the curation institution in the Final Monitoring Report submitted to the RE or BI and MMC.</p> <p>D. Final Monitoring Report(s)</p> <p>1. The PI shall submit one copy of the approved Final Monitoring Report to the RE or BI as appropriate, and one copy to MMC (even if negative), within 90 days after notification from MMC that the draft report has been approved.</p> <p>2. The RE shall, in no case, issue the Notice of Completion and/or release of the Performance Bond for grading until receiving a copy of the approved Final Monitoring Report from MMC, which includes the Acceptance Verification from the curation institution.</p>	
<b>Section 5.12 Paleontological Resources</b>		
<p>The proposed project has the potential to result in significant impacts to paleontological resources potentially present within the Stadium Conglomerate.</p>	<p><b>PR-1</b></p> <p>I. Prior to Permit Issuance</p> <p>A. Entitlements Plan Check</p> <p>1. Prior to the issuance of a Notice to Proceed (NTP) or any construction permits, including but not limited to, the first Grading Permit, Demolition Plans/Permits and Building Plans/Permits, but prior to the first preconstruction meeting, whichever is applicable, the Assistant Deputy Director (ADD) Environmental Designee shall verify that the requirements for Paleontological Monitoring have been noted on the appropriate construction documents.</p> <p>B. Letters of Qualifications have been submitted to ADD</p> <p>1. Prior to the NTP, and/or issuance of a Grading Permit, Demolition Permit or Building</p>	<p>Less than Significant</p>

Environmental Impact	Mitigation Measures	Significance After Mitigation
	<p>Permit, the applicant shall provide a letter of verification to Mitigation Monitoring Coordination (MMC) identifying the Principal Investigator (PI) for the project and the names of all persons involved in the paleontological monitoring program, as defined in the City of San Diego Paleontology Guidelines.</p> <ol style="list-style-type: none"> <li>2. The MMC will provide a letter to the applicant confirming the qualifications of the PI and all persons involved in the paleontological monitoring of the project.</li> <li>3. Prior to the start of work, the applicant shall obtain approval from MMC for any personnel changes associated with the monitoring program.</li> </ol> <p>II. Prior to the Start of Construction</p> <p>A. Verification of Records Search</p> <ol style="list-style-type: none"> <li>1. The PI shall provide verification to MMC that a site-specific records search has been completed. Verification includes, but is not limited to a copy of a confirmation letter from San Diego Natural History Museum, other institution or, if the search was in-house, a letter of verification from the PI stating that the search was completed.</li> <li>2. The letter shall introduce any pertinent information concerning expectations and probabilities of discovery during trenching and/or grading activities.</li> </ol> <p>B. PI Shall Attend Precon Meetings</p> <ol style="list-style-type: none"> <li>1. Prior to beginning of any work that requires monitoring, the Applicant shall arrange a Pre-Construction (Precon) Meeting that shall include the PI, Construction Manager (CM) and/or Grading Contractor, Resident Engineer (RE), Building inspector (BI), if</li> </ol>	

Environmental Impact	Mitigation Measures	Significance After Mitigation
	<p>appropriate, and MMC. The qualified paleontologist shall attend any grading-related Precon Meetings to make comments and/or suggestions concerning the Paleontological Monitoring Program with the Construction Manager and/or Grading Contractor.</p> <p>a. If the Monitor is unable to attend the Precon Meeting, the Applicant shall schedule a focused Precon Meeting with MMC, the RE, CM, or BI as appropriate, to meet and review the job on-site prior to start of any work that requires monitoring.</p> <p>2. Identify Areas to be Monitored                      Prior to the start of any work that requires monitoring, the PI shall submit a Paleontological Monitoring Exhibit (PME) based on the appropriate construction documents (reduced to 11x17) to MMC identifying the areas to be monitored including the delineation of grading/excavation limits. The PME shall be based on the results of a site-specific records search as well as information regarding existing known soil conditions (native or formation).</p> <p>3. When Monitoring Will Occur</p> <p>a. Prior to the start of any work, the PI shall also submit a construction schedule to MMC through the RE indicating when and where monitoring will occur.</p> <p>b. The PI may submit a detailed letter to MMC prior to the start of work or during construction requesting a modification to the monitoring program. This request shall be based on relevant information such as review of final construction</p>	

Environmental Impact	Mitigation Measures	Significance After Mitigation
	<p>documents, which indicate conditions such as depth of excavation and/or site graded to bedrock, presence or absence of fossil resources, etc., which may reduce or increase the potential for resources to be present.</p> <p>III. During Construction</p> <p>A. Monitor Shall be Present During Grading/Excavation/Trenching</p> <ol style="list-style-type: none"> <li>1. The monitor shall be present full time during grading/excavation/trenching activities as identified on the PME that could result in impacts to formations with high and moderate resource sensitivity. The Construction Manager is responsible for notifying the RE, PI, and MMC of changes to any construction activities.</li> <li>2. The monitor shall document field activity via the Consultant Site Visit Record (CSVr). The CSVrs shall be faxed by the CM to the RE the first day of monitoring, the last day of monitoring, monthly (Notification of Monitoring Completion), and in the case of ANY discoveries. The RE shall forward copies to MMC.</li> <li>3. The PI may submit a detailed letter to MMC during construction requesting a modification to the monitoring program when a field condition such as trenching activities that do not encounter formational soils as previously assumed, and/or when unique/unusual fossils are encountered, which may reduce or increase the potential for resources to be present.</li> </ol> <p>B. Discovery Notification Process</p> <ol style="list-style-type: none"> <li>1. In the event of a discovery, the</li> </ol>	

Environmental Impact	Mitigation Measures	Significance After Mitigation
	<p>Paleontological Monitor shall direct the contractor to temporarily divert trenching activities in the area of discover and immediately notify the RE or BI, as appropriate.</p> <ol style="list-style-type: none"> <li>2. The Monitor shall immediately notify the PI (unless Monitor is the PI) of the discovery.</li> <li>3. The PI shall immediately notify MMC by phone of the discovery, and shall also submit written documentation to MMC within 24 hours by fax or email with photos of the resource in context, if possible.</li> </ol> <p>C. Determination of Significance</p> <ol style="list-style-type: none"> <li>1. The PI shall evaluate the significance of the resource.               <ol style="list-style-type: none"> <li>a. The PI shall immediately notify MMC by phone to discuss significance determination and shall also submit a letter to MMC indicating whether additional mitigation is required. The determination of significance for fossil discoveries shall be at the discretion of the PI.</li> <li>b. If the resource is significant, the PI shall submit a Paleontological Recovery Program (PRP) and obtain written approval from MMC. Impacts to significant resources must be mitigated before ground-disturbing activities in the area of discovery will be allowed to resume.</li> <li>c. If resource is not significant (e.g., small pieces of broken common shell fragments or other scattered common fossils) the PI shall notify the RE, or BI as appropriate, that a non-significant discovery has been made. The</li> </ol> </li> </ol>	

Environmental Impact	Mitigation Measures	Significance After Mitigation
	<p>Paleontologist shall continue to monitor the area without notification to MMC unless a significant resource is encountered.</p> <p>d. The PI shall submit a letter to MMC indicating that fossil resources will be collected, curated, and documented in the Final Monitoring Report. The letter shall also indicate that no further work is required.</p> <p>VI. Night Work</p> <p>A. If night work is included in the contract</p> <p>1. When night work is included in the contract package, the extent and timing shall be presented and discussed at the Precon Meeting.</p> <p>2. The following procedures shall be followed:</p> <p>a. No Discoveries</p> <p>In the event that no discoveries were encountered during night work, The PI shall record the information on the CSV and submit to MMC via fax by 9:00 a.m. the following morning, if possible.</p> <p>b. Discoveries</p> <p>All discoveries shall be processed and documented using the existing procedures detailed in Sections III – During Construction.</p> <p>c. Potentially Significant Discoveries</p> <p>If the PI determines that potentially significant discovery has been made, the procedures detailed under Section III – During Construction shall be followed.</p> <p>d. The PI shall immediately contact MMC, or by 8:00 a.m. the following morning to</p>	

Environmental Impact	Mitigation Measures	Significance After Mitigation
	<p>report and discuss the findings as indicated in Section III-B, unless other specific arrangements have been made.</p> <p>B. If night work becomes necessary during the course of construction</p> <ol style="list-style-type: none"> <li>1. The Construction Manager shall notify the RE, or BI, as appropriate, a minimum of 24 hours before the work is to begin.</li> <li>2. The RE or BI, as appropriate, shall notify MMC immediately.</li> </ol> <p>C. All other procedures described above shall apply, as appropriate.</p> <p>V. Post Construction</p> <p>A. Submittal of Draft Monitoring Report</p> <ol style="list-style-type: none"> <li>1. The PI shall submit two copies of the Draft Monitoring Report (even if negative), which describes the results, analysis, and conclusions of all phases of the Paleontological Monitoring Program (with appropriate graphics) to MMC for review and approval within 90 days following the completion of monitoring.                     <ol style="list-style-type: none"> <li>a. For significant paleontological resources encountered during monitoring, the Paleontological Recovery Program shall be included in the Draft Monitoring Report.</li> <li>b. Recording Sites with the San Diego Natural History Museum The PI shall be responsible for recording (on the appropriate forms) any significant or potentially significant fossil resources encountered during the Paleontological Monitoring Program in accordance with the City's Paleontological Guidelines,</li> </ol> </li> </ol>	

Environmental Impact	Mitigation Measures	Significance After Mitigation
	<p>and submittal of such forms to the San Diego Natural History Museum with the Final Monitoring Report.</p> <ol style="list-style-type: none"> <li>2. MMC shall return the Draft Monitoring Report to the PI for revisions or for preparation of the Final Report.</li> <li>3. The PI shall submit revised Draft Monitoring Report to MMC for approval.</li> <li>4. MMC shall provide written verification to the PI of the approved report.</li> <li>5. MMC shall notify the RE or BI, as appropriate, of receipt of all Draft Monitoring Report submittals and approvals.</li> </ol> <p>B. Handling of Fossil Remains</p> <ol style="list-style-type: none"> <li>1. The PI shall be responsible for ensuring that all fossil remains collected are cleaned and catalogued.</li> <li>2. The PI shall be responsible for ensuring that all fossil remains are analyzed to identify function and chronology as they relate to the geologic history of the area; that faunal material is identified as to species; and that specialty studies are completed, as appropriate.</li> </ol> <p>C. Curation of Fossil Remains: Deed of Gift and Acceptance Verification</p> <ol style="list-style-type: none"> <li>1. The PI shall be responsible for ensuring that all fossil remains associated with the monitoring for this project are permanently curated with an appropriate institution.</li> <li>2. The PI shall include the Acceptance Verification from the curation institution in the Final Monitoring Report submitted to the RE or BI and MMC.</li> </ol> <p>D. Final Monitoring Report(s)</p>	

Environmental Impact	Mitigation Measures	Significance After Mitigation
	<ol style="list-style-type: none"> <li>1. The PI shall submit two copies of the Final Monitoring Report to MMC (even if negative), within 90 days after notification from MMC that the draft report has been approved.</li> <li>2. The RE shall, in no case, issue the Notice of Completion until receiving a copy of the approved Final Monitoring Report from MMC, which includes the Acceptance Verification from the curation institution.</li> </ol>	
<b>Section 5.14 Noise</b>		
<p>The proposed project has the potential to result in indirect noise impacts to adjacent sensitive habitat and biological resources during construction.</p>	<p>Refer to Mitigation Measures <b>LU-1</b> and <b>BR-1</b> above.</p>	<p>Less Than Significant</p>

# 1.0 INTRODUCTION

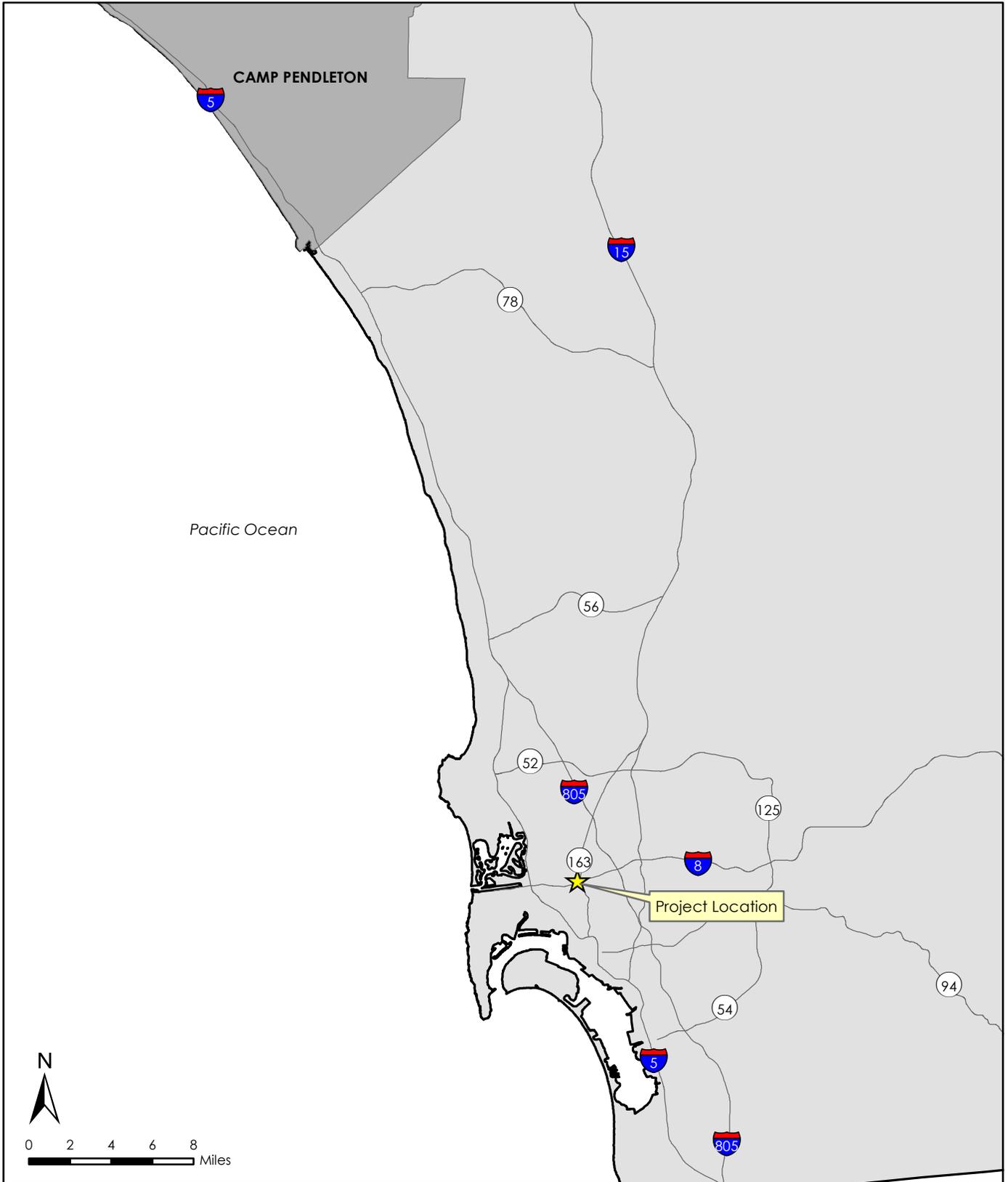
This Environmental Impact Report (EIR) evaluates the potential short-term and long-term, direct and indirect, and cumulative environmental impacts of the Union Tribune Mixed Use Project (proposed project). The proposed project is the redevelopment of the existing Mission Valley headquarters site of the San Diego Union Tribune. The project is described as an estimated \$200-million, pedestrian-friendly, transit-oriented, mixed-use project that will add residential housing, public open space, and retail uses to existing office, and manufacturing space. The site is near natural vegetation associated with the San Diego River. The location of the project site is depicted in Figure 1-1, Regional Map, and Figure 1-2, Local Vicinity Map.

Specifically, the project would include:

- New seven-story multi-unit residential buildings featuring 200 dwelling units for a total of 285,645 square feet of gross floor area;
- Four stories of parking, featuring 671 parking spaces for a total of 212,069 square feet of gross floor area, to be located on a below-grade level and the first three levels of one of the residential buildings (Northwest Building);
- Conversion of 3,000 square feet of ground floor area of the existing UT printing building to retail amenity space; and,
- Implementation of the San Diego River Park Master Plan along the northern boundary of the project, including an extension of the San Diego River Park trail from the Town and Country Resort property to the west, and the provision of a public pocket park adjacent to the River Park area, which would include approximately 35,402 square feet (River Park is 23,455 square feet and public pocket park is 11,947 square feet).

The City of San Diego (City) is the lead agency in preparing this EIR in accordance with the California Environmental Quality Act (CEQA) of 1970 (California Resources Code, Section 21000 et seq.) and CEQA Guidelines (14 CCR 15000 et seq.). The project applicant, Mission Valley Holdings LLC, has submitted an application for discretionary approval consisting of a Vesting Tentative Map (VTM), Site Development Permit (SDP), and Planned Development Permit (PDP).

The overall project site is less than 13 acres and is located at 350 Camino De La Reina, in the area loosely bounded by Interstate 8, State Route 163, the San Diego River and Fashion Valley within the Mission Valley Community. The site is occupied by 168,575 square feet of office space (Union Tribune offices) and 191,600 square feet of manufacturing land uses (Union Tribune printing facility). In addition, the site is also occupied by an existing 2,474 square foot, one-story automotive service center located adjacent to the existing printing facility, which previously included a fuel station for on-site truck operations. However, the automotive service center was terminated from operation several years ago. The project site is located within the Mission Valley Master Plan Area and currently operates as the Union Tribune's Headquarters from which the newspaper is written, edited, printed and distributed. Figure 1-3 provides an aerial view of the existing site.



SOURCE: SanGIS, 2014; BRG Consulting, Inc., 2014

10/22/14



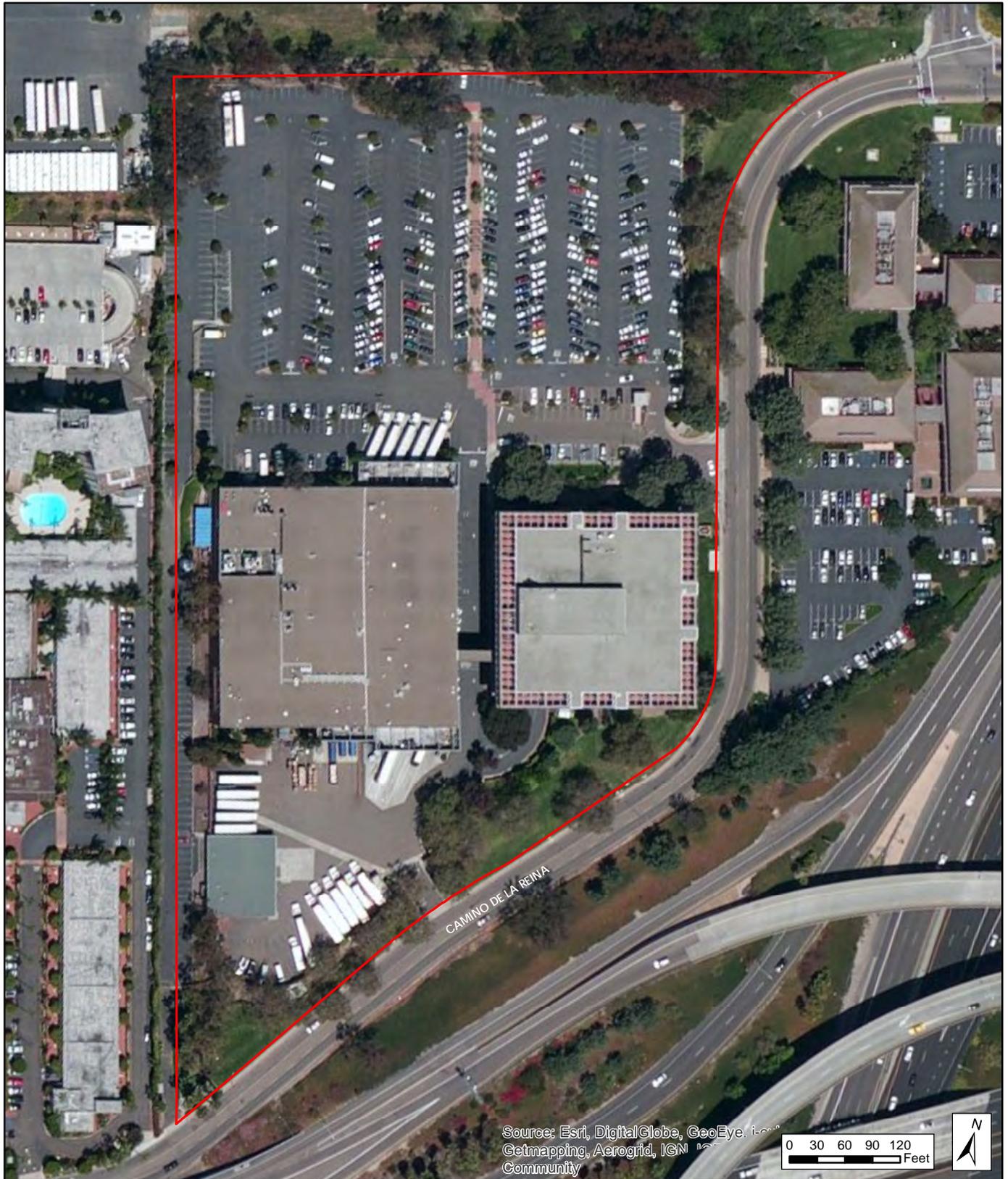
Union Tribune Mixed Use Project EIR

Regional Location

FIGURE

1-1





SOURCE: Esri, 2014; SanGIS, 2014

10/22/14



Union Tribune Mixed Use Project EIR  
 Aerial Map of the Project Site

FIGURE  
 1-3

EIRs are informational documents “which will inform public agency decision makers and the public generally of the significant environmental effect of a project, identify possible ways to minimize the significant effects, and describe reasonable alternatives to the project” (14 CCR 15121). The purpose of this EIR is to evaluate the environmental effects of the project.

This EIR is intended for use by both the decision makers and the public. It provides relevant information concerning the potential environmental effects associated with the construction and operation of the proposed project.

## 1.1 CEQA Requirements

### 1.1.1 CEQA Compliance

CEQA (California Resources Code, Section 21000 et seq.) requires the preparation of an EIR for any project that a lead agency determines may have a significant effect on the environment. According to Section 21002.1(a) of the CEQA Statutes, “the purpose of an environmental impact report is to identify the significant effects on the environment of a project, to identify alternatives to the project, and to indicate the manner in which those significant effects can be mitigated or avoided.” CEQA also establishes mechanisms whereby the public and decision makers can be informed about the nature of the project being proposed, and the extent and types of impacts that the project and its alternatives would have on the environment if they were to be implemented. This EIR has been prepared to comply with all criteria, standards, and procedures of the State CEQA Guidelines (14 CCR 15000 et seq.).

This EIR has also been prepared pursuant to the City’s CEQA Significance Thresholds (City of San Diego, 2011). This document has been prepared as a project EIR pursuant to Section 15161 of the CEQA Guidelines, and it represents the independent judgment of the City as the lead agency.

### 1.1.2 Notice of Preparation and Scoping Meeting

The scope of analysis for the EIR was determined by the City in a scoping letter dated March 13, 2013, as well as a result of public responses to the Scoping Letter and Notice of Preparation (NOP). In compliance with Section 15082 of the CEQA Guidelines, the City Development Services Department circulated the NOP and Scoping Letter to interested agencies, groups, and individuals. The 30-day public review period for the NOP ended on April 12, 2013. In addition, a public scoping meeting was held on March 27, 2013, at the Union Tribune Building, located at 350 Camino de la Reina, San Diego, CA 92108 to gather additional public input. Comments received during the NOP scoping period and meeting were considered during the preparation of this EIR. The NOP, Scoping Letter, and comments received are included as Appendix A of this EIR. Based on the scope of analysis of this EIR, the following issues were determined to be potentially significant and are therefore addressed in Chapter 5.0 – Environmental Analysis of this EIR:

- Land Use
- Traffic/Circulation/Parking
- Greenhouse Gas Emissions
- Biological Resources
- Geologic Conditions
- Historical Resources (Archaeological)
- Hydrology
- Public Services and Facilities
- Public Utilities
- Visual Effects/Neighborhood Character

- Water Quality
- Paleontological Resources
- Air Quality
- Noise

In addition, comment letters received during the NOP public scoping period expressed concerns about hazardous materials, cultural resources (Native American concerns), biological resources, hydrology and water quality, water usage, and traffic. These concerns have been identified as areas of known controversy and are also analyzed in this EIR.

Based on the environmental analysis of the proposed project, additional CEQA-mandated environmental topics, such as agricultural and forestry resources, health and safety and hazardous materials, historical resources (built environment), mineral resources, population and housing, and recreation were not found to be significant. These issues are addressed in Chapter 7.0 – Effects Found Not to be Significant, of this EIR.

## 1.2 Purpose and Uses of this EIR

This project EIR evaluates the potentially significant environmental effects that would result with the implementation of the proposed project.

This EIR is available for review by members of the public and public agencies for 45 days to provide comments “on the sufficiency of the document in identifying and analyzing the possible impacts on the environment and ways in which the significant effects of the project might be avoided or mitigated” (14 CCR 15002). The EIR is available for review at the following locations:

City of San Diego, Development Services Department

1222 First Avenue, Fifth Floor

San Diego, California 92101

Mission Valley Branch Library

2123 Fenton Parkway

San Diego, California 92108

Mission Hills Branch Library

925 Washington Street

San Diego, California 92103

In addition, the draft EIR and associated technical appendices will be placed on the City of San Diego website.

The Notice of Availability of the EIR has been mailed as required by the CEQA Guidelines and the City.

As the designated lead agency, the City has assumed responsibility for preparing this document. The decision to approve the project is within the purview of the City Planning Commission (Process 4). When deciding whether to approve the project, the City will use the information included in this EIR to consider potential impacts on the physical environment associated with the proposed project.

The City will consider written comments received on the EIR in making its decision to certify the EIR as complete and in compliance with CEQA, and also whether to approve or deny the project. In the final review, environmental considerations and economic and social factors will be weighed to determine the most appropriate course of action.

The City will use the EIR and supporting documentation in its decision to issue discretionary permits including a VTM, SDP, PDP, and to approve a shared parking agreement. Subsequent to certification of the EIR, any agencies with permitting authority over all or portions of the proposed project would use the EIR as the basis for their evaluation of environmental effects of the project and approval or denial of applicable permits.

Additional information regarding City and agency permits and approvals is detailed in Section 3.3 of this EIR.

## 1.3 EIR Format

An executive summary of this EIR is provided at the beginning of the document. The summary includes the conclusions of the environmental analysis and a comparative summary of the project with the alternatives analyzed in the EIR. Chapter 1.0, Introduction, introduces the project in light of the required environmental review procedures. Chapter 2.0, Environmental Setting, describes the project location and physical environmental setting. Chapter 3.0, Project Description, provides the project description, the purpose and objectives of the project, required discretionary approvals, and a brief description of the project changes in response to environmental issues. Chapter 4.0, History of Project Changes, provides a description of changes to the project since it was originally submitted. Chapter 5.0 consists of the environmental analysis, which examines the potentially significant environmental issues. Chapter 6.0, Cumulative Impacts, addresses cumulative impacts. Chapter 7.0 addresses effects found not to be significant. Chapter 8.0 addresses other required CEQA topics. Chapter 9.0, Alternatives, addresses a reasonable range of project alternatives, and Chapter 10.0, includes the project specific Mitigation, Monitoring and Reporting Program. The remaining EIR sections and appendices are provided as set forth in the table of contents.

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## 2.0 ENVIRONMENTAL SETTING

This chapter provides a description of existing site conditions for the Union Tribune Mixed Use Project (project) site. The section also provides an overview of the local and regional environmental setting of the project, per Section 15125 of the CEQA Guidelines. More details regarding the setting specifically pertaining to each environmental issue are provided at the beginning of each impact area addressed in Chapter 5.0 – Environmental Analysis.

### 2.1 Location

The project site is centrally located in the City of San Diego (City), within the Mission Valley Community Planning Area (see Figure 1-1, Regional Map). The Mission Valley Community Planning Area is comprised of approximately 2,418 net acres and is bound on the west by Interstate 5 (I-5), on the north by Friars Road west of State Route 163 (SR-163) and by the northern slopes of the valley east of SR-163, on the east by the eastern bank of the San Diego River, and on the south by the southern slopes of the valley. More specifically, the project site is located at the northwest corner of Interstate 8 (I-8) and SR-163, at 350 Camino De La Reina, San Diego, California, 92108. The project site comprises of Lot 2 of Map No. 6860 (APN 437-260-41). The project site fronts Camino De La Reina to the south and east, and is bounded by the San Diego River to the north, and the Town and Country Hotel to the west. The project site is approximately two miles northeast of San Diego International Airport and three miles southwest of Montgomery Field.

### 2.2 Physical Characteristics

#### 2.2.1 Existing On-Site Uses

The project site is approximately 12.86 acres and has been graded and developed. The site is currently developed with the Union-Tribune office building, a separate printing facility, automotive service center, and a surface parking lot (see Figure 1-3, Aerial Map of the Project Site).

#### 2.2.2 Existing Physical Site Conditions

The project site is currently occupied by a surface parking lot on the northern half of the property. The office building is located on the southeast corner, and the printing facility on the southwest corner. There is currently street frontage on Camino De La Reina to the south, between the two buildings, and to the east, north of the office building. Topography of the project site is generally flat but slopes gently down toward the San Diego River to the north. Elevations range from approximately 40 feet above mean sea level (AMSL) at the southern end of the property to 28 feet AMSL at the northern end. Descriptions of additional on-site physical characteristics, such as biological, geological and water resources are provided in their respective sections of Chapter 5.0 of this EIR.

### 2.3 Surrounding Land Uses

The project site is located in an urban setting and is surrounded by the San Diego River, existing development, and major transportation corridors. The project site is surrounded by a mix of commercial and office uses. Adjacent to the project site to the west is the Town and Country Hotel, and the Mission Valley Convention Center and Riverwalk Golf Course located west of that. Across Camino De La Reina to the east is a complex of office buildings. To the north is

the San Diego River, and north of the San Diego River is the San Diego Trolley green line and the Fashion Valley shopping mall. South of I-8 is the eastern end of Hotel Circle, comprised entirely of lodging and accommodations.

## 2.4 Applicable Land Use Plans

Section 15125(d) of the CEQA Guidelines requires that a discussion of the inconsistencies between the project and applicable general plans and regional plans be provided. The consistency analysis for the project with applicable plans, policies, and regulations is provided in Section 5.1 of the EIR. The following summarizes the plans, policies, and regulations that are applicable to the project.

### 2.4.1 City of San Diego General Plan

The City of San Diego General Plan consists of development policies, in the form of Findings, Goals, Guidelines, Standards, and Recommendations for a variety of elements. The General Plan also references a series of community plans, which are intended to provide more area-specific guidance on development in San Diego. The General Plan's planned land use designation for the project site is "Industrial" (Category 4 – General). A detailed analysis of the project's consistency in the context of the applicable elements of the General Plan is provided in Section 5.1 of this EIR.

### 2.4.2 Mission Valley Community Plan

The Mission Valley Community Plan is the City's statement of policy for the physical development of the community of Mission Valley. Mission Valley is primarily a business community with much of its developable land devoted to commercial and office uses. The Mission Valley Community Plan establishes goals, policies and proposals for each of the following elements: Land Use, Transportation, Open Space, Development Intensity, Community Facilities, Conservation, Cultural and Heritage Resources, Urban Design, and Implementation. The project site is currently designated as Industrial Park. A detailed analysis of the project's consistency in the context of the applicable elements of the Mission Valley Community Plan is provided in Section 5.1 of this EIR.

### 2.4.3 San Diego River Park Master Plan

The San Diego River Park Master Plan is a policy document that provides recommendations and guidelines to be considered in concert with land use decisions along the San Diego River. The goal of the plan is to create a continuous river park linking all 17.5 miles of the river within the City of San Diego, and ultimately from its headwaters near Julian to the Pacific Ocean. The River Park Master Plan defines the River Corridor Area as all areas within 35 feet of the 100-year floodway and defines the River Influence Area as areas within 200 feet of the River Corridor Area. The recommendations describe general and specific strategies for addressing the ecological health of the river, facilitating human recreational use as an amenity for economic development, and orienting development toward the river to create value and provide identity for the San Diego River Park.

### 2.4.4 Zoning

Zoning for the property located in the City of San Diego is governed by the City's Land Development Code (LDC). The majority of the project site is zoned MVPD-MV-I (Industrial). The remaining portion of the site, approximately 850 square feet of the northeast corner, is zoned OF-1-1 (Open Space—Floodplain).

The MVPD-MV-I district, or MV-I, is a Planned District zone specifically for the Mission Valley Planned District. The purpose of the MV-I zone is to supplement the design criteria of LDC Zone IL-2-1 (Industrial—Light). Any proposed development under the MV-I Zone must also comply with all other relevant sections of the Mission Valley Planned District Ordinance. Where there is a conflict between the provisions of the IL-2-1 Zone and the provisions of the Mission Valley Planned District Ordinance, the Mission Valley Planned District Ordinance applies. Uses allowed within the IL-2-1 Zone include a mix of light industrial and office uses with limited commercial. Residential land uses are generally not permitted within the IL-2-1 Zone.

The purpose of the OF-1-1 zone is to control development within floodplains to protect the public health, safety and welfare, and to minimize hazards associated with flood-prone areas. Adjacent zoning includes OF-1-1 to the north, MVPD-MV-M/SP (Mission Valley - Multiple Use - Atlas Specific Plan) for the Town and Country Hotel parcel to the west, and MVPD-MV-CO (Mission Valley - Commercial Office) across Camino De La Reina to the east.

## 2.4.5 Regional Plans

In accordance with Section 15125(d) of the CEQA Guidelines, this environmental setting discussion includes statements relative to conformance with applicable regional plans. In addition to the City's General Plan, the following regional plans are assessed for consistency.

### **Airport Land Use Compatibility Plan**

The project site is located within the Airport Influence Area (Review Area 2) for the Montgomery Field Airport Land Use Compatibility Plan (ACLUP). The project site is also within the Federal Aviation Administration (FAA) Part 77 Notification Area for both Montgomery Field and the San Diego International Airport. These plans are further discussed in Section 5.1 of this EIR.

### **Regional Air Quality Plan**

The San Diego Air Pollution Control District (SDAPCD) and San Diego Association of Governments (SANDAG) have jointly developed the San Diego Regional Air Quality Strategy (RAQS) to identify feasible emission control measures to achieve compliance with the state ozone standard. The RAQS addresses volatile organic compounds (VOCs) and oxides of nitrogen (NOx), which are the precursors to the photochemical formation of ozone. The last RAQS was initially adopted in 1991 and most recently amended in 2004. The SDAPCD has also developed the San Diego Air Basin's (SDAB's) input to the State Implementation Plan (SIP), which is required under the federal Clean Air Act (CAA) for areas that are in nonattainment of air quality standards. The RAQS relies on information from the California Air Resource Board (CARB) and SANDAG, including mobile area source emissions and information regarding projected growth in the county to project future emissions. The RAQS then determines the strategies necessary for reduction of emissions through regulatory controls. See Section 7.0 – Effects Found Not to be Significant, for further details.

### **Congestion Management Program**

As the transportation planning agency for the San Diego region, SANDAG is responsible for preparing and coordinating the implementation of a Congestion Management Program (CMP). The CMP guidelines stipulate that any project development generating 2,400 or more average daily trips, or 200 or more Peak-Hour trips, must be evaluated in accordance with the requirements of the regional CMP. The CMP analysis must include the traffic level

of service (LOS) impacts on affected freeways and regionally significant arterial systems, which include all designated CMP roadways. In order to conform to the region's CMP, the local jurisdiction must adopt and implement a land use analysis program to assess impacts of land use decisions on the regional transportation system. The City of San Diego has opted out of the CMP since 2009.

#### **Water Quality Control Plan for the San Diego Basin**

The U.S. Environmental Protection Agency (EPA) has delegated responsibility for implementation of portions of the Clean Water Act (CWA) to the State Water Resources Control Board (SWRCB) and the Regional Water Quality Control Boards (RWQCBs), including water quality control planning and control programs, such as the National Pollutant Discharge Elimination System (NPDES) program. The NPDES program is a set of permits designed to implement the CWA that apply to various activities that generate pollutants with potential to impact water quality. The RWQCB adopted a Water Quality Control Plan (Basin Plan) for the San Diego Basin. This Basin Plan sets forth water quality objectives for constituents that could potentially cause an adverse effect or impact on the beneficial uses of water. The plan is designed to preserve and enhance the quality of water resources in the San Diego region. The purpose of the plan is to designate beneficial uses of the region's surface and ground waters, designate water quality objectives for the reasonable protection of those uses, and establish an implementation plan to achieve the objectives. The Basin Plan incorporates by reference all applicable SWRCB and RWQCB plans and policies.

## **2.5 Emergency Services**

Public safety related facilities and services (e.g., police, fire, and emergency medical response) are to be provided to ensure service standards are attained for existing and proposed development. New facilities are to have good vehicular access and be carefully reviewed for environmental, land use, and aesthetic impacts. Appropriate equipment and staffing should be assigned to the facilities to ensure adequate response to the population and the structure types that may exist in the community. Additional information is provided in Section 5.8 of this EIR.

### **2.5.1 Fire Protection and Emergency Medical Services**

The project site is currently served by Fire Station 5 of the San Diego Fire-Rescue Department, located 1.2 miles southeast at 3902 9th Avenue. Fire protection and Emergency Medical Services for the proposed project would continue to be provided by Fire Station 5, as the proposed project lies within the property boundary of the existing Union Tribune building. According to correspondence with Public Information Officer Lee Swanson, the current average response time from Fire Station 5 to areas with the same proximity to Station 5 as the proposed project is 4 minutes and 50 seconds (Correspondence Date: September 12, 2013).

### **2.5.2 Police Protection**

The project site is currently served by Beat 623 in the Mission Valley West neighborhood in the Western Division of the San Diego Police Department. The closest police station is 1.7 miles to the west of the project site, located at 5215 Gaines Street. Police protection for the proposed project would continue to be provided by the Western Division of the San Diego Police Department.