4.0 HISTORY OF PROJECT CHANGES

The proposed project was initially submitted April 25, 2012 and included the existing Union Tribune (UT) offices, a new office facility, the existing print facility retrofitted to be a parking structure, approximately 200 residential units, a new parking structure, and amenity space. The river path area included a private park for residents and tenants. Subsequent submittals identified more specific amenities such as retail uses, a café, and a green roof terrace above the new parking structure. It was also determined with the Parks and Recreation staff that a portion of the UT property would include a 0.29-acre public pocket park. The public pocket park went through a series of public workshops and City reviews which resulted in its current approved design. The river path area has been modified throughout the review cycles to be consistent with the recently approved San Diego River Park Master Plan (PTS No. 121886). A trail connection at the Town & Country property line at the northwest corner of the UT property has been added to provide a link to the existing Fashion Valley Transit Center and allow the proposed UT site to function as a Transit Oriented Development (TOD). The trail alignment has been approved as part of the Town and County Parking Lot Project (PTS No. 118318). Lastly, in order to maintain consistency with the Mission Valley Community Plan, other design features have been modified or mitigation measures have been added, such as the widening of Camino De La Reina and the relocation of the driveway entrance to align with the property to the east.

Two screenchecks of the Draft EIR, including technical reports, for the initially proposed mixed-use project for the UT property were submitted and reviewed by the City at the end of 2013 and in April 2014. Based on the traffic analysis that was completed for the project, the project would result in significant traffic impacts that would require a substantial fairshare payment for traffic improvements. There was a shift in market demand during the 2013/2014 review period, and it was determined by the applicant that there was a lack of a need for Class “A” Commercial Office space, which was being proposed by the project. Therefore, the applicant decided to eliminate the previously proposed 9-story, approximately 246,000 gross square feet, Class “A” Commercial Office building from the project. The Print Facility will now remain as is, because the number of required parking spaces was substantially reduced with elimination of the Commercial Office building.

The new proposed project, which is fully analyzed in this EIR, is a smaller mixed-use transit-oriented development project than what was previously proposed, because it will still provide multiple using on the site in close proximity to public transit. By removing the office tower, keeping the existing offices and Print Facility, and keeping approximately the same number of residential units (although designed to be less conspicuous in the community), the site will remain as a multiple-use headquarters for the UT that includes offices, production, retail, residential, and public space. The development plans for the new proposed project was submitted to the City for review on October 6, 2014.

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5.1 Land Use

This section of the EIR discusses the potential environmental impacts of the proposed project associated with land use and planning.

5.1.1 Existing Conditions

Existing land uses within the proposed development, as well as the areas adjacent to the project area, are characterized in the context of the City of San Diego General Plan, the Mission Valley Community Plan, and the associated Zoning Ordinance, as well as other adopted plans and policies.

Existing land uses within the project site include office and general light industry. Adjacent land uses off-site include the San Diego River open space to the north, hotel/motel to the west, the Camino De La Reina and Interstate 8/State Route 163 interchange right-of-way to the south, and offices across Camino De La Reina to the east. Figure 5.1-1 depicts the existing land uses at and around the project site.

5.1.1.1 Regulatory Setting

There are numerous laws, regulations, plans, policies, programs, codes, and ordinances that regulate land use development within the San Diego region. The four local plans directing land use development at the project site include the City of San Diego General Plan, the Mission Valley Community Plan, the City of San Diego Multiple Species Conservation Program Subarea Plan, and the San Diego River Park Master Plan.

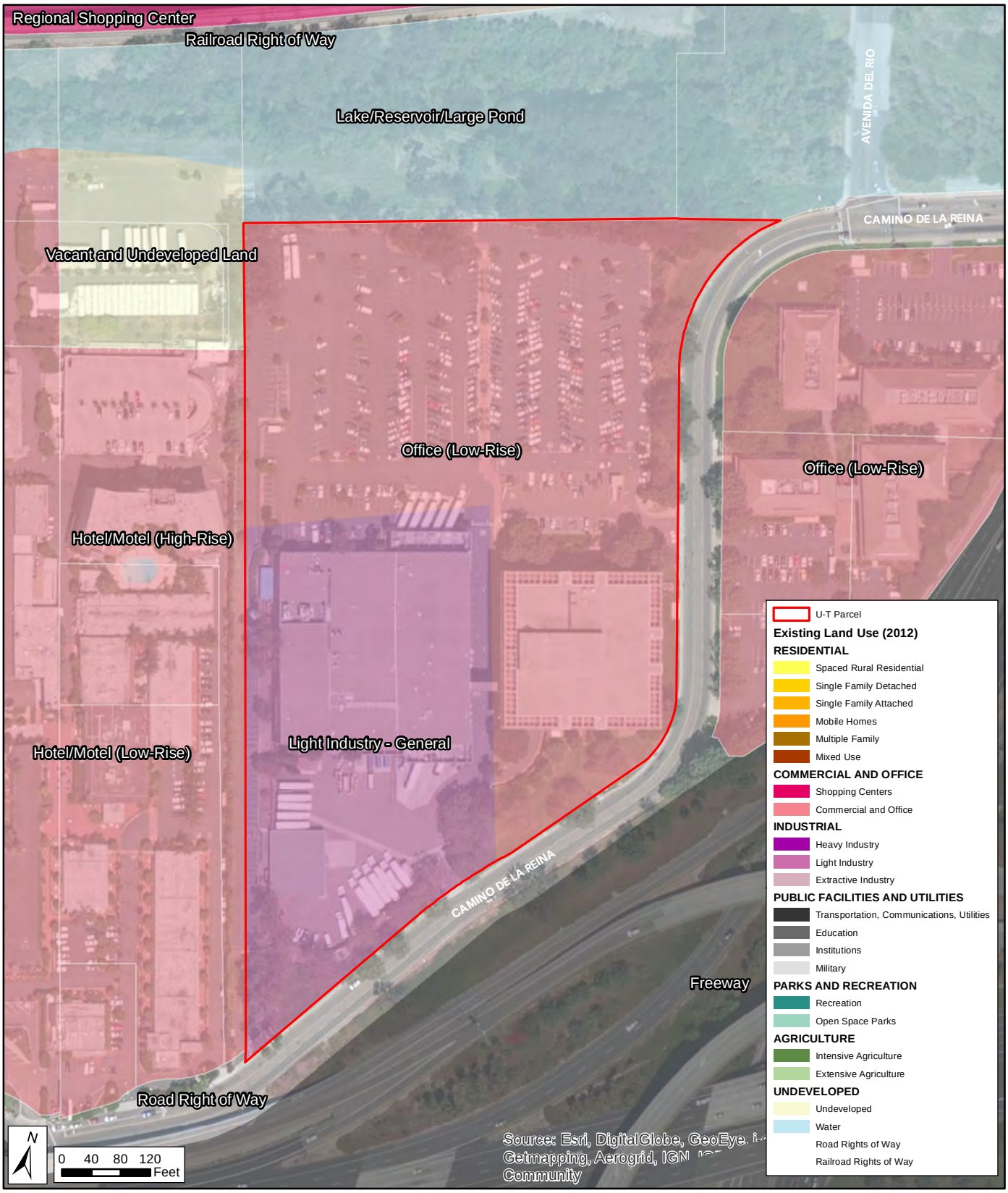
City of San Diego General Plan

As required by State Planning and Zoning Law, the City has developed a "comprehensive, long-term plan for the physical development of the City, and of any land outside its boundaries which bears relation to its planning" (State of California, 2000). For the City of San Diego, this plan is known as the General Plan (City of San Diego, 2008). The General Plan consists of development policies, in the form of Findings, Goals, Guidelines, Standards, and Recommendations for a variety of land use 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).

Mission Valley Community Plan

The proposed project is located within the City of San Diego's Mission Valley Community Planning Area, shown on Figure 5.1-2. Mission Valley is composed of a wide mix of uses, including residential, employment, commercial, and recreational, centered around the San Diego River and the light rail trolley. The Mission Valley Community Plan (City of San Diego, 1985) 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 Plan designates the land use category at the proposed project site as Industrial Park.

In order to permit greater flexibility in project design than is possible through strict application of conventional zoning regulations, City of San Diego planning staff has determined that the project may utilize the Mission Valley



SOURCE: Esri, 2014; SanGIS, 2014

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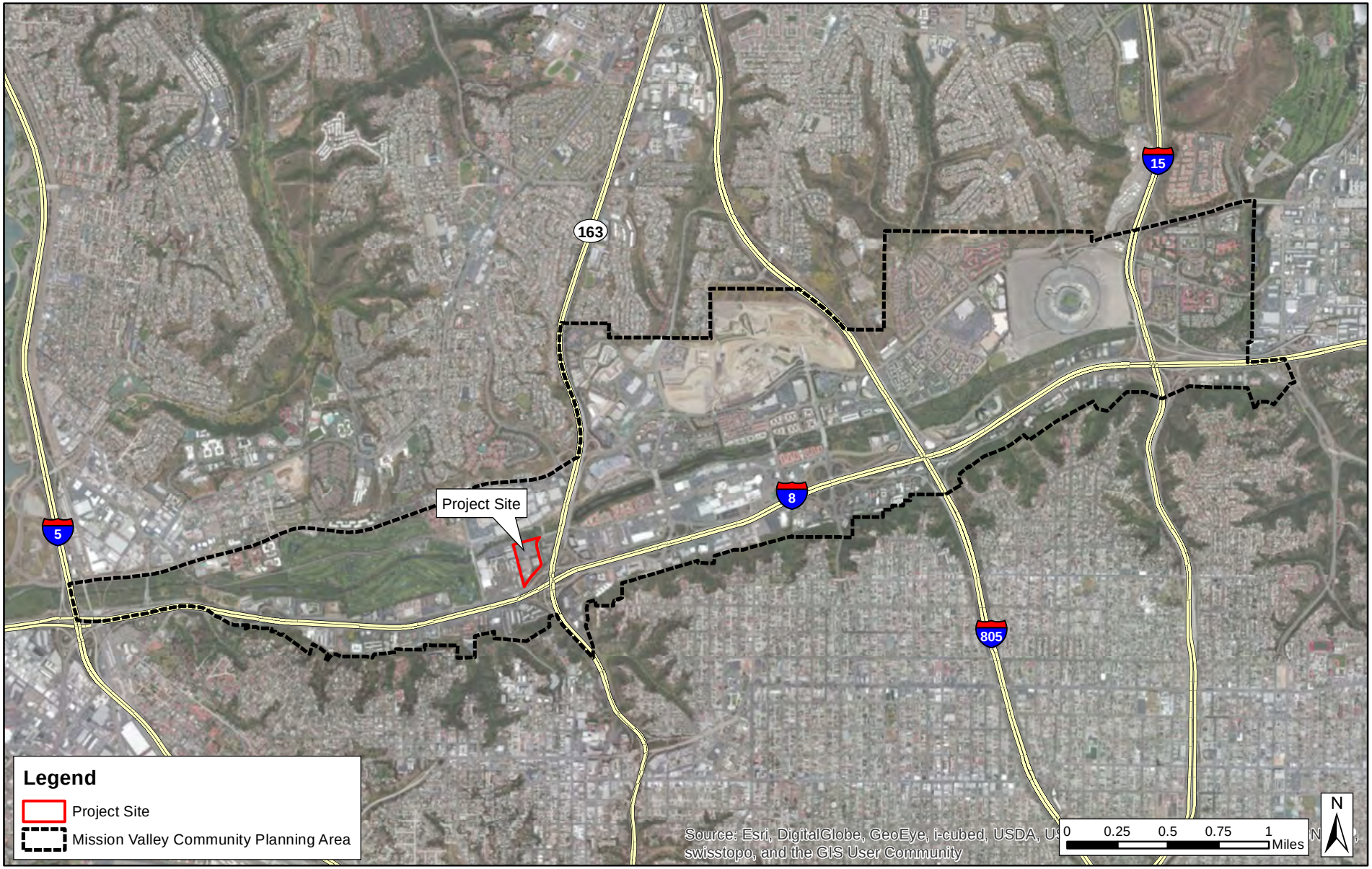
Existing Land Use

FIGURE

5.1-1



SOURCE: Esri, 2014; SanGIS, 2014

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Mission Valley Community Planning Area

FIGURE

5.1-2

Community Plan's Multiple Use Option for development of the proposed project. Multi-use projects may also include separate structures on separate parcels of land providing that the creation of parcels and designation of uses is the result of a plan approved for the entire designated project and it meets the basic criteria for a multi-use project.

In accordance with the Multiple Use Option for developers, the proposed project is seeking an application through a Planned Development Permit (PDP). Under SDMC 143.0403(a)(1), a PDP allows uses identified in the applicable land use plan when not allowed in the applicable base zone, such as residential uses. Through the Multiple Use Option, the proposed project is in conformance with zoning requirements, as long as the conditions specified in the PDP are satisfied and the appropriate findings are made.

Multiple Use Option developments contain two or more significant revenue-producing uses such as retail, office, and residential, all of which are components of the project site. They also include significant functional and physical integration of project components, including uninterrupted pedestrian connections, both within the project and to adjacent developments, as well as a permanent pedestrian linkage to the nearest transit station. Specifically, there are multiple well-connected focal points such as the pedestrian pathway connecting from the main entry to the site passing between the residential towers and ultimately leading to the San Diego River Park pedestrian promenade. This promenade provides access to the Fashion Valley Transit Station to the west and a pocket park located on the northeast corner of the property.

City of San Diego Multiple Species Conservation Program/ Multi-Habitat Planning Area

The Multiple Species Conservation Program (MSCP) is a comprehensive, long-term habitat conservation planning program for southwestern San Diego County designed to provide permit-issuance authority for take of covered species to the local regulatory agencies. Through implementation of its MSCP Subarea Plan, the City of San Diego is an MSCP participant. The Subarea Plan designates the City's Multi-Habitat Planning Area (MHPA), a preserve area established to delineate core biological resource areas and corridors targeted for conservation, as shown in figure 5.1-3. Limited development in these areas is allowed to occur and is regulated by the Biology Guidelines (2002) for Environmentally Sensitive Lands (ESL) regulations in the City of San Diego Land Development Code.

The project lies within the City's MSCP Subarea, and is adjacent to the MHPA at its northern boundary. This urban habitat area, which follows the San Diego River through Mission Valley, contributes to the MSCP by providing habitat for native species, shelter and forage for migrating species, and linkages between biological core areas capable of supporting a diverse range of native species. Due to the project's adjacency with the MHPA, compliance with several MSCP Subarea Plan directives is required, in addition to compliance with the City's other MSCP implementing regulations.

Section 1.4.2 of the City's MSCP Subarea Plan includes general planning policies and design guidelines for the planning of projects adjacent to or within the MHPA. The proposed project does not include new roads, large utility lines, or mining facilities and does not propose any new flood control structures, thus these sections of the plan would not be applicable to the project. The following general planning policies and design guidelines have been taken into consideration during design of the proposed project.

- Fencing and other barriers shall be used where it is determined to be the best method to achieve conservation goals and adjacent land uses incompatible with the MHPA.

SOURCE: Esri, 2014; SanGIS, 2014

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Multi-Habitat Planning Area (MHPA)

FIGURE 5.1-3

- Lighting shall be designed to avoid intrusion into the MHPA and effects on wildlife. Lighting in areas of wildlife crossings should be of low-sodium or similar lighting.
- Signage will be limited to access and litter control and educational purposes.
- Storage of materials (e.g., hazardous or toxic, chemicals, equipment, etc.) shall be prohibited within the MHPA and ensure appropriate storage per applicable in any areas that may impact the MHPA, especially due to leakage.

In addition, the following land use adjacency guidelines (Section 1.4.3 and Appendix A of the City's MSCP Subarea Plan) have been considered during design of the proposed project.

- All new and proposed parking lots and developed areas in and adjacent to the preserve must not drain directly into the MHPA.
- Land uses that use chemicals or generate materials that are potentially toxic or impactive to wildlife, sensitive species, habitat, or water quality need to incorporate measures to reduce impacts caused by the application and/or drainage of such materials into the MHPA.
- Lighting of all developed areas adjacent to the MHPA should be directed away from the MHPA.
- Uses in or adjacent to the MHPA should be designed to minimize noise impacts. Excessively noisy uses or activities adjacent to breeding areas must incorporate noise reduction measures and be curtailed during the breeding season of sensitive species. Adequate noise reduction measures should also be incorporated for the remainder of the year.
- New development adjacent to the MHPA may be required to provide barriers (e.g., non-invasive vegetation, rocks/boulders, fences, walls, and/or signage) along the MHPA boundaries to direct public access to appropriate locations and reduce domestic animal predation.
- No invasive non-native plant species shall be introduced into areas adjacent to the MHPA.
- New residential development located adjacent to and topographically above the MHPA must be set back from slope edges to incorporate Zone 1 brush management areas on the development pad and outside of the MHPA.
- 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.

Moreover, Figure 4 of the City's MSCP Subarea Plan includes a specific guideline map note immediately west of the project area, which requires native vegetation to be restored as a condition of future development proposals along this portion of the river corridor. However, the adjacent river corridor property is owned by Town and Country LLC; and therefore, restoration and enhancement planning for this area is not part of the proposed project.

San Diego River Park Master Plan

The San Diego River Park Master Plan (City of San Diego, 2013) is a policy document that provides recommendations and design guidelines for the land use decisions along the San Diego River. The vision of the Master Plan is to "reclaim the valley as a common, a synergy of water, wildlife and people."

The Plan divides the San Diego River into six segments, or reaches, that are based on topographic characteristics and river conditions. The six reaches include the Estuary (Pacific Ocean to I-5), the Lower Valley (I-5 to I-15), the Confluence (I-15 to Friars Road Bridge), the Upper Valley (Friars Road Bridge to Mission Trails Regional Park), and the Plateau (east of Mission Trails to the City of Santee). The proposed project site is located within the Lower Valley reach of the river.

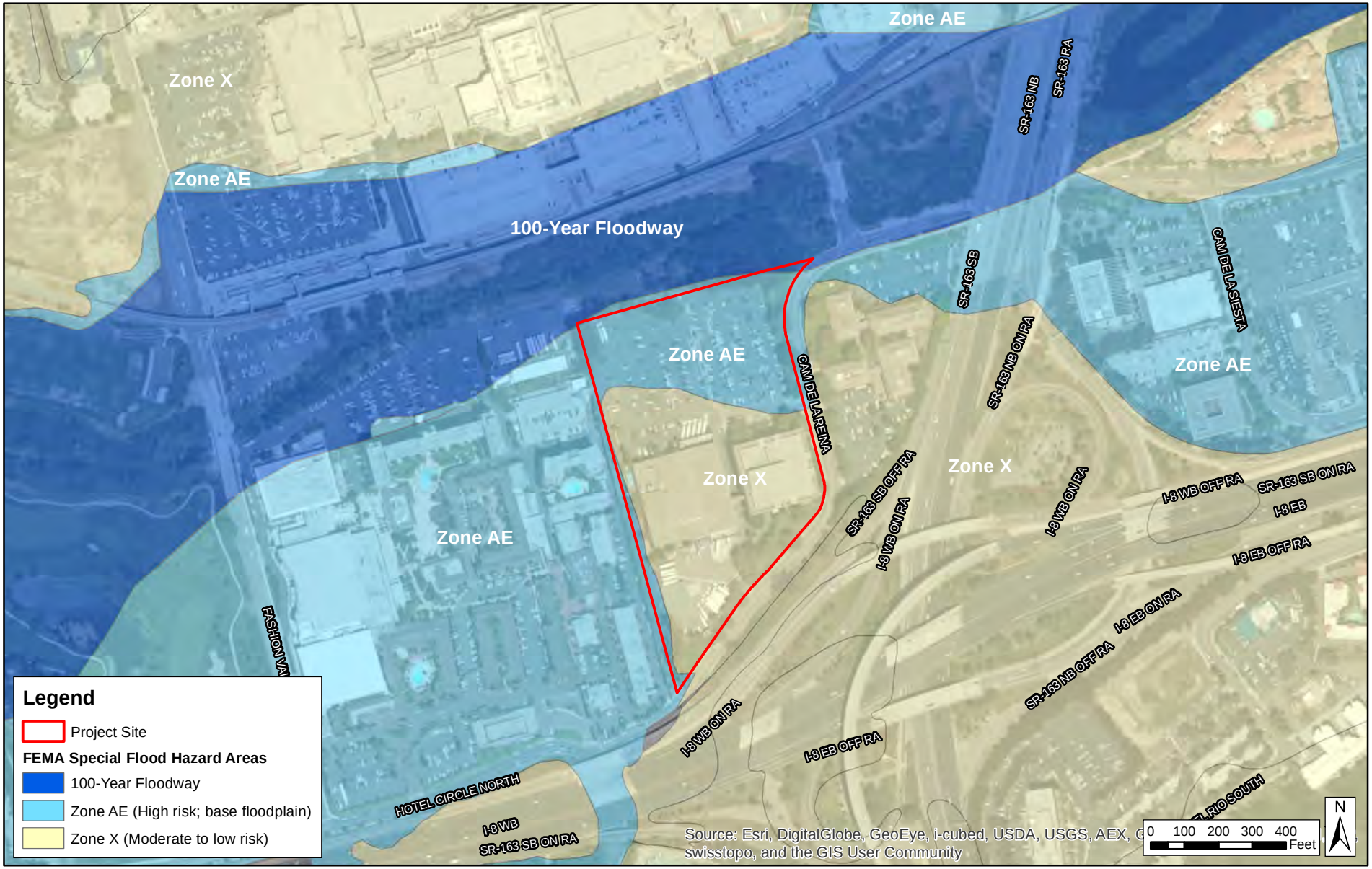
Each of the six reaches has its own general and specific recommendations on the future development of the river valley. The Design Guidelines of the Master Plan provides written and graphic information to support the Master Plan Vision, Principles, and Recommendations and is written for two distinct areas of the River Park area; the River Corridor Area and the River Influence Area. The River Corridor Area is defined as all areas within 35 feet of the 100-year floodway (as defined by the Federal Emergency Management Agency [FEMA], and shown on Figure 5.1-4). The River Influence Area is defined 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 how development should be reoriented toward the river to create value and provide identity for the San Diego River Park.

Mission Valley Planned District

Zoning for the property located in the City of San Diego is governed by the City's Land Development Code (LDC). The Mission Valley Planned District (MVPD), which is established by ordinance in the San Diego Municipal Code Chapter 15, Article 14, is the relevant zoning ordinance for the project site. The purpose of the MVPD is to implement the Mission Valley Community Plan through the use of: (a) overlay districts regulating development intensity community-wide and providing additional development criteria for projects in the San Diego River and Hillside subdistricts; (b) residential, commercial, industrial, and multiple land use zones providing basic development criteria; (c) special development regulations which address unique Mission Valley needs and are applied to all land uses, and (d) continued application of the city-wide Open Space-Floodplain Zone and Environmentally Sensitive Lands Regulations. The Mission Valley Planned District ordinance also contains a section on the San Diego River Subdistrict requirements.

The project site is located within two Mission Valley Planned District sub-areas: the Development Intensity Overlay District and the San Diego River Subdistrict. The purpose of the Development Intensity Overlay District is to limit development intensity to the levels allowed under the Mission Valley Community Plan by limiting the number of average daily trips (ADT) generated by the land uses of any development proposal. The purpose of the San Diego River Subdistrict is to ensure development along the San Diego River is consistent with the San Diego River Park Master Plan and the San Diego River section of the Mission Valley Community Plan.

The project site is mostly zoned MVPD-MV-I (Industrial), but also includes a relatively small, 850 square foot portion of the northeast corner zoned OF-1-1(Open Space—Floodplain). Zoning is shown on Figure 5.1-5.



SOURCE: Esri, 2014; FEMA, 2014

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FEMA Special Flood Hazard Areas

FIGURE

5.1-4

SOURCE: Esri, 2014; SanGIS, 2014

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Zoning

FIGURE

5.1-5

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 generally are 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.

5.1.2 Issue 1

Issue 1: A significant land use impact would occur if implementation of the proposed project would result in a conflict with the goals, objectives, and recommendations of the City of San Diego General Plan, the Multiple Species Conservation Program (MSCP), the Mission Valley Community Plan, the San Diego River Park Master Plan, or the Mission Valley Planned District Ordinance.

5.1.2.1 Impact Analysis

The City of San Diego's CEQA Significance Determination Thresholds outlines the thresholds for determination relevant to the proposed project. The following would be considered significant land use impacts:

- *If implementation of the proposed project would result in a conflict with the goals, objectives, and recommendations of the City of San Diego General Plan, the Multiple Species Conservation Program (MSCP), the Mission Valley Community Plan, the San Diego River Park Master Plan, or the Mission Valley Planned District Ordinance.*

The land use plans were reviewed to ensure that the proposed project would be consistent with the plans' goals, objectives, and recommendations. The proposed project's compliance with City of San Diego Municipal Code's zoning regulations for the Mission Valley Planned District Ordinance was also reviewed. The criteria used for determining the applicability of (and, if necessary, conformance with) specific goals, objectives, recommendations, and design guidelines of the plans were based on the development features identified in the project description, and the potential direct and indirect impacts of those features, as identified throughout this EIR. Specific goals, objectives, recommendations, and design guidelines are not applicable to every project and only those applicable are discussed. Potential conflicts between the proposed project and the applicable goals, objectives and recommendations of these four plans are addressed on a plan-by-plan basis, as follows.

A. City of San Diego General Plan

Table 5.1-1 provides an analysis of the proposed project's consistency with the City of San Diego General Plan recommendations that are applicable to the proposed project.

TABLE 5.1-1
General Plan Consistency Analysis

A. Public Facilities, Services, and Safety Element	
Goal: Protection of beneficial water resources through pollution prevention and interception efforts.	Consistent – As discussed in EIR Section 5.7 (Hydrology) and 5.11 (Water Quality), water resources are located directly adjacent to the project area. Compliance with the General Construction, Municipal Stormwater Permit and the City of San Diego Stormwater Standards Manual will protect beneficial uses through pollution prevention and interception.
Goal: A storm water conveyance system that effectively reduces pollutants in urban runoff and storm water to the maximum extent practicable.	Consistent – As discussed in EIR Section 5.7 (Hydrology) and 5.11 (Water Quality), water resources are located within the project area. Compliance with the City of San Diego Stormwater Standards Manual, which includes preparation of a SWPPP, implementation of construction BMPs, post-construction Standard Development Project LID/Site Design, Priority Development Project BMPs and Treatment Control BMPs will reduce run-off rates and durations to a level less than significant.
Goals: Protection of public health and safety through abated structural hazards and mitigated risks posed by seismic conditions. Development that avoids inappropriate land uses in identified seismic risk areas.	Consistent – As discussed in EIR Section 5.5 (Geology), the proposed project would comply with all City structural engineering standards, and the project site is not located within a seismic risk area.
B. Recreation Element	
Goals: Provision of an inter-connected park and open space system that is integrated into and accessible to the community. Preserve, protect, and enrich natural, cultural, and historic resources that serve as recreation facilities.	Consistent – The public park space and trail included in the proposed project would be inter-connected with the planned San Diego River Park and would be publically accessible to the community. Development of the public park space will preserve, protect, and enrich the river, which serves as a recreation facility.

C. Conservation Element	
Climate Change and Public Safety	
Goal: Reduce the City's carbon footprint by improving energy efficiency, increasing use of alternative modes of transportation, employing sustainable planning and design techniques, and providing environmentally sound waste management.	Consistent – As discussed in EIR Section 5.3 (GHG), construction-related and operational greenhouse gas emissions associated with the proposed project would be below a level of significance.
Urban Runoff Management	
Goal: Protection and restoration of water bodies, including reservoirs, coastal waters, creeks, bays, and wetlands. Preservation of natural attributes of both the floodplain and floodway without endangering life and property.	Consistent - Compliance with the General Construction Permit, the Municipal Stormwater Permit and the City of San Diego Stormwater Standards Manual will reduce impacts to water quality and will reduce runoff rates and duration to a level less than significant. Development of project park land will preserve and restore the natural attributes of the floodplain and floodway. Project development will be two feet above the mapped flood elevation and the Applicant will process a Conditional Letter of Map Revision per City and FEMA requirements.
Air Quality	
Goal: Regional air quality which meets state and federal standards.	Consistent – As discussed in EIR Section 7 (Effects Found Not to be Significant), emissions associated with the proposed project would meet regional air quality standards.
Goal: Reduction in greenhouse gas emissions effecting climate change.	Consistent – As discussed in EIR Section 5.3 (GHG), emissions associated with the proposed project would be below a level of significance.
Biological Diversity	
Goal: Preservation of healthy, biologically diverse regional ecosystems and conservation of endangered, threatened, and key sensitive species and their habitats.	Consistent – As discussed in EIR Section 5.4 (Biological Resources), an adequate buffer area between wetlands associated with the San Diego River and the proposed project would be provided. No impacts to endangered, threatened, and key sensitive species and their habitats are expected.
Wetlands	
Goal: Preservation of San Diego's rich biodiversity and heritage through the protection and restoration of wetland resources.	Consistent – As discussed in EIR Section 5.4 (Biological Resources), the proposed project would not impact any existing wetland habitat and an adequate buffer area between wetlands associated with the San Diego River and the proposed project would be provided.

Goal: Preservation of all existing wetland habitat in San Diego through a "no net loss" approach.	Consistent – As discussed in EIR Section 5.4 (Biological Resources), the proposed project would not impact any existing wetland habitat.
Urban Forestry	
Policy: Seek to retain significant and mature trees.	Consistent – The proposed project has been designed to protect in place 24 of the existing mature trees along the Camino de la Reina Street frontage, including 19 California Sycamores, four Torrey Pines, and one Indian Laurel. The preservation of these trees will maintain the existing visual character of the area to the fullest extent possible. The streetscape is being supplemented with additional parkway trees, groundcover, and low growing shrubs.
D. Noise Element	
Goal: Minimal exposure of residential and other noise-sensitive land uses to excessive construction, commercial, and mixed-use related noise.	Consistent – As discussed in EIR Section 7.0 (Effects Found Not to be Significant), the proposed project would implement this goal by avoiding noise impacts to the extent practicable, minimizing unavoidable impacts, and mitigating any impacts that cannot be avoided or minimized.
E. Land Use & Community Planning Element	
City of Villages Strategy	
Goal: Mixed-use villages located throughout the City and connected by high-quality transit. *Policy LU-A.1*. Designate a hierarchy of village sites for citywide implementation. b. Encourage further intensification of employment uses throughout Subregional Employment Districts. Where appropriate, consider collocating medium- to high-density residential uses with employment uses. c. Designate Neighborhood, Community, and Urban Village Centers, as appropriate, in community plans throughout the City, where consistent with public facilities adequacy and other goals of the General Plan. d. Revitalize transit corridors through the application of plan designations and zoning that permits a higher intensity of mixed-use development. Include some combination of: residential above commercial development,	Consistent – The proposed project is a mixed-use development integrating office, residential, retail, and open space land uses on one site within 1,200 feet (walking distance) of the Fashion Valley Transit Center providing light rail and bus service connecting to all regions of the County.

employment uses, commercial uses, and higher density residential development. *Policy LU-A.2*. Identify sites suitable for mixed-use village development that will complement the existing community fabric or help achieve desired community character, with input from recognized community planning groups and the general public. *Policy LU-A.4*. Locate village sites where they can be served by existing or planned public facilities and services, including transit services.	
Balanced Communities and Equitable Development	
Goal: Community and neighborhood specific strategies and implementation measures to achieve equitable development. *Policy LU-H.6.* Provide linkages among employment sites, housing, and villages via an integrated transit system and a well-defined pedestrian and bicycle network.	Consistent – The proposed project is a mixed-use development integrating office, residential, retail, and open space land uses with enhanced pedestrian and bicycle connections both on- and off-site. The Fashion Valley Transit Center is within short walking distance (1,200 feet) from the site and linkages from the site to the center are proposed.
Environmental Justice	
Goal: Improve mobility options and accessibility in every community. *Policy LU-I.11.* Implement the City of Villages concept for mixed-use, transit-oriented development as a way to minimize the need to drive by increasing opportunities for individual to live near where they work, offering a convenient mix of local goods and services, and providing access to high quality transit service.	Consistent – The proposed project includes significant functional and physical integration of project components, including uninterrupted pedestrian connections, both within the project and to adjacent developments, as well as a permanent pedestrian linkage to the nearest transit station. The proposed project includes two multi-family residential buildings, adjacent to employment opportunities and retail uses.
F. Urban Design Element	
General Urban Design Goal	
Goal: A pattern and scale of development that provides visual diversity, choice of lifestyle, opportunities for social intersection, and that respects desirable community character and context. A City with distinctive districts, communities, neighborhoods, and village centers where people gather and interact.	Consistent – The proposed project is located 1,200 feet (walking distance) from the Fashion Valley Transit Center and enhances the permanent pedestrian access from the site to the transit center.

Policy UD-A.9. Incorporate existing and proposed transit stops or stations into project design. d. Locate buildings along transit corridors to allow convenient and direct access to transit stops/stations.	
G. Mobility Element	
Walkable Communities	
Goals: A complete, functional, and interconnected pedestrian network that is accessible to pedestrians of all abilities. Greater walkability achieved through pedestrian-friendly street, site and building design. A safe and comprehensive local and regional bikeway network. *Policy ME-A.6.* Work toward achieving a complete, functional and interconnected pedestrian network. b. Link sidewalks, pedestrian paths and multi-purpose trails into a continuous region-wide network where possible. *Policy ME-A.8.* Encourage a mix of uses in villages, commercial centers, transit corridors, employment centers and other areas as identified in community plans so that it is possible for a greater number of short trips to be made by walking.	Consistent – The project proposes the extension of the paved multi-use river trail (public trail) for pedestrians, bikes and emergency access from the Town and Country Hotel parcel to the east through the open space park area proposed at the northern end of the site. In addition, a pedestrian pathway from the northwestern edge of the property connects to the sidewalk along Camino de la Reina to the south. Full pedestrian circulation is provided along the entire perimeter of the site and enhanced pedestrian connections are included internally throughout the site connecting the residential, open space, office, industrial, and retail amenity uses. Pedestrian connectivity to the Fashion Valley Transit Center is provided via the shared pedestrian/bicycle path along the San Diego River traversing to the west along the Town and Country property, and ultimately crossing the San Diego River to connect to the transit center. The project also proposes also proposes an irrevocable offer of dedication (IOD) and deferred improvement agreement (DIA) for widening along the project frontage of Camino De La Reina to accommodate its future classification as a 4-lane Major. By providing an IOD and DIA, the Applicant's widening of Camino De La Reina to half-width of a 4-lane Major would accommodate Class II bike lanes along the project frontage, further promoting bicycle mobility.
Transit First	
Goal: An attractive and convenient transit system that is the first choice of travel for many of the trips made in the City. Increased transit ridership. *Policy ME-B.9.* Make transit an integral component of long range planning documents	Consistent – The project proposes the extension of the paved multi-use river trail (public trail) for pedestrians, bikes and emergency access from the Town and Country Hotel parcel to the east through the open space park area proposed at the northern end of the site. In addition, a pedestrian pathway from the northwestern edge of the property connects to the sidewalk

and the development review process. b. Plan for transit-supportive villages, transit corridors, and other higher-intensity uses in areas that are served by existing or planned higher-quality transit services, in accordance with Land Use and Community Planning Element, Sections A and C. e. Design for walkability in accordance with the Urban Design Element, as pedestrian supportive design also helps create a transit supportive environment.	along Camino de la Reina to the south. Full pedestrian circulation is provided along the entire perimeter of the site and enhanced pedestrian connections are included internally throughout the site connecting the residential, open space, office and print facility, and retail amenity uses. Pedestrian connectivity to the Fashion Valley Transit Center is provided via the shared pedestrian/bicycle path along the San Diego River traversing to the west along the Town and Country property, and ultimately crossing the San Diego River to connect to the transit center.
Transportation Demand Management	
Goal: Reduced single-occupant vehicle traffic on congested streets and freeways. Improved performance and efficiency of the street and freeway systems, by means other than roadway widening or construction. Expanded travel options and improved personal mobility. *Policy ME-E.1.* Support and implement TDM strategies including, but not limited to: alternative modes of transportation, alternative work schedules, and telework. *Policy ME-E.2.* Maintain and enhance personal mobility options by supporting public and private transportation projects that will facilitate the implementation of TDM strategies. *Policy ME-E.6.* Require new development to have site designs and on-site amenities that support alternative modes of transportation. Emphasize pedestrian and bicycle-friendly design, accessibility to transit, and provision of amenities that are supportive and conducive to implementing TDM strategies such as car sharing vehicles and parking spaces, bike lockers, preferred rideshare parking, showers and lockers, on-site food service, and child care, where appropriate. *Policy ME-E.7.* Consider TDM programs with achievable trip reduction goals as partial mitigation for development project traffic and air quality impacts.	Consistent – The project provides a mixed-use, transit oriented development (TOD) that provides the appropriate setting for implementing Transportation Demand Management (TDM) measures as it proposes a corporate office/ residential live/work development supported by on-site retail. The project proposes to implement a TDM Plan that aims to reduce peak period vehicle trips by providing carpool/vanpool parking spaces in preferential parking locations, a pedestrian path connecting the entire perimeter and interior of the site to the Fashion Valley Transit Center, charging station(s) for electric vehicles, and will coordinate with local transit operators to optimize service to the area. Information on ridesharing materials for the iCommute program, "Guaranteed Ride Home" program, bicycle route and parking/safety information, and promotional materials provided by MTS and other publically supported transportation organizations will be provided on-site and be made readily available. In addition, a listing of facilities at the site for carpoolers/vanpoolers, transit riders, bicyclists, and pedestrians, including information on the availability of preferential carpool/vanpool parking spaces and the methods for obtaining these spaces will be available on-site. The project will also participate 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 and annual events will be held to promote the use of alternative transportation. Bicycle racks will be provided for resident and/or retail employee use.

Policy ME-E.8. Monitor implementation of TDM programs to ensure effectiveness.	
Bicycling	
Goal: A safe and comprehensive local and regional bikeway network. *Policy ME-F.1* Implement the Bicycle Master Plan which identifies existing and future needs, and provides specific recommendations for facilities and programs over the next 20 years. d. Improve connectivity of the multi-use trail network, for use by bicyclists and other as appropriate. *Policy ME-F.4.* Provide safe, convenient, and adequate short and long term bicycle parking facilities and other bicycle amenities for employment, retail, multi-family housing, schools, colleges, and transit facility uses. b. Provide bicycle facilities and amenities to help reduce the number of vehicle trips.	Consistent – Pedestrian/bicyclist connectivity to the Fashion Valley Transit Center is provided via the shared pedestrian/bicycle path along the San Diego River traversing to the west along the Town and Country property, and ultimately crossing the San Diego River to connect to the transit center. Bicycle racks will be provided for resident and/or retail employee use. The project also proposes an irrevocable offer of dedication (IOD) and DIA for widening along the project frontage of Camino De La Reina to accommodate its future classification as a 4-lane Major. By providing an IOD and DIA, the Applicant's widening of Camino De La Reina to half-width of a 4-lane Major would accommodate Class II bike lanes along the project frontage, further promoting bicycle mobility.
H. Housing Element	
Goal: Ensure the provision of sufficient housing for all income groups to accommodate San Diego's anticipated share of regional growth over the next housing element cycle, 2013-2020, in a manner consistent with the development pattern of the Sustainable Communities Strategy (SCS), that will help meet regional GHG targets by improving transportation and land use coordination and jobs/housing balance, creating more transit-oriented, compact and walkable communities, providing more housing capacity for all income levels, and protecting resource areas. Objective: Identify and make available for development adequate sites to meet the City's diverse housing needs. *Policy HE-A.3.* Through the community plan update process, designate land for a variety of residential densities sufficient to meet its housing needs for a variety of household sizes, with higher densities being focused in the vicinity of major employment centers and transit service.	Consistent – The proposed project is a mixed-use development integrating office, high-density residential, retail, and open space land uses with enhanced pedestrian and bicycle connections both on- and off-site. The Fashion Valley Transit Center is within short walking distance (1,200 feet) from the site and linkages from the site to the center are proposed. The proposed project includes significant functional and physical integration of project components, including uninterrupted pedestrian connections, both within the project and to adjacent developments, as well as a permanent pedestrian linkage to the nearest transit station. The proposed project includes two multi-family residential buildings to partially meet the housing needs of the community, adjacent to employment opportunities and retail uses. The project proposes to implement a TDM Plan to reduce GHG and vehicular trips.

Goal: Cultivate the City as a sustainable model of development. Objective: Promote the reduction of GHG in accordance with SB 375 and the California Long-Term Energy Efficiency Strategic Plan; and promote consistency with the General Plan's City of Villages Strategy and other Citywide planning efforts. *Policy HE-J.3.* Seek to locate higher-density housing principally along transit corridors, near employment opportunities, and in proximity to village areas identified elsewhere in community plans.	Consistent – The proposed project is a mixed-use development integrating office, high-density residential, retail, and open space land uses with enhanced pedestrian and bicycle connections both on- and off-site. The Fashion Valley Transit Center is within short walking distance (1,200 feet) from the site and linkages from the site to the center are proposed. The proposed project includes significant functional and physical integration of project components, including uninterrupted pedestrian connections, both within the project and to adjacent developments, as well as a permanent pedestrian linkage to the nearest transit station. The proposed project includes two multi-family residential buildings, adjacent to employment opportunities and retail uses. The project proposes to implement a TDM Plan to reduce GHG and vehicular trips.

Source: City of San Diego, 2015; BRG Consulting, Inc. 2015; Latitude 33, 2015

B. Mission Valley Community Plan

The proposed project is located within the City of San Diego's Mission Valley Community Planning Area. Mission Valley is composed of a wide mix of uses, including residential, employment, commercial, and recreational, centered around the San Diego River and the light rail trolley. The Mission Valley Community Plan (City of San Diego, 1985) 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 Plan designates the land use category at the proposed project site as Industrial Park.

In order to permit greater flexibility in project design than is possible through strict application of conventional zoning regulations, City of San Diego planning staff has determined that the project may utilize the Mission Valley Community Plan's Multiple Use Option for development of the proposed project. Multi-use projects may also include separate structures on separate parcels of land providing that the creation of parcels and designation of uses is the result of a plan approved for the entire designated project and it meets the basic criteria for a multi-use project.

In accordance with the Multiple Use Option for developers, the proposed project is seeking an application through a PDP. Under SDMC 143.0403(a)(1), a PDP allows uses identified in the applicable land use plan when not allowed in the applicable base zone, such as residential uses. Through the Multiple Use Option, the proposed project is in conformance with zoning requirements, as long as the conditions specified in the PDP are satisfied and the appropriate findings are made.

Multiple Use Option developments contain two or more significant revenue-producing uses such as retail, office, and residential, all of which are components of the project site. They also include significant functional and physical integration of project components, including uninterrupted pedestrian connections, both within the project and to

adjacent developments, as well as a permanent pedestrian linkage to the nearest transit station. Specifically, there are multiple well-connected focal points such as the pedestrian pathway connecting from the main entry to the site passing between the residential towers and ultimately leading to the San Diego River Park pedestrian promenade. This promenade provides access to the Fashion Valley Transit Station to the west and a pocket park located on the northeast corner of the property.

The Multiple Use Option is intended to encourage comprehensive developments which will minimize the need for an over reliance on automobile access and emphasize pedestrian orientation and proximity to public transit. The proposed project accomplishes this by providing access to a pedestrian pathway leading directly to the nearby Fashion Valley Transit Station.
With the Multiple Use Option, mixed-use activity centers are encouraged within larger multi-use projects in order to create opportunities for "urban villages" within the community plan area. Village development is pedestrian-friendly and characterized by inviting, accessible, and attractive streets and public spaces such as public parks or plazas, community meeting spaces, or outdoor gathering spaces. The San Diego River Park pedestrian promenade and pocket park included with the proposed project help to create an opportunity for such an urban village. The mix of multi-family residential and retail uses proposed is a common component of the urban village and provides a higher degree of walkability and security than traditional retail centers.

Multiple Use Option developments are eligible for density bonuses if they can incorporate the bonus provisions included in the Development Intensity Element of the Mission Valley Community Plan. Additional development intensity based upon increased traffic generation can be permitted if it can be shown that: 1) the additional traffic generation can be accommodated; or 2) additional improvements can be made to the circulation/transportation system which will accommodate the increase in traffic generation. The proposed project, however, is not eligible for density bonuses.

Table 5.1-2 provides an analysis of the proposed project's consistency with the objectives and development guidelines from the Mission Valley Community Plan that were determined to be applicable to the proposed project.

TABLE 5.1-2
Mission Valley Community Plan Consistency Analysis

A. Land Use	
Objective: Provide new development and redevelopment which integrates various land uses into coordinated multi-use projects.	Consistent – The proposed project is a mixed-use development integrating office, residential, retail, and open space land uses.
Guideline: Multi-use development projects should include separate vehicular access and delivery loading zones, people oriented spaces, compatibility with adjacent development, and uninterrupted pedestrian connections.	Consistent – The proposed project includes separate vehicular access and delivery loading zones, a "people-oriented" public park space, compatibility with the adjacent Town and Country Hotel, and an extension of the San Diego River Park multi-use trail through the north end of the development.

Guideline: Encourage activity on a 24-hour basis within a development project by including one or more of the following types of uses in addition to office and retail: restaurants, theatres, hotels, residences.	Consistent – The proposed project is a multiple-use project, although title "Mixed-Use," development integrating office, manufacturing, and retail with multi-family residential apartments and townhomes.
B. Transportation	
Guideline: Pedestrian and/or bikeway access should be provided along the length of the river. The pedestrian and bikeway access should be placed in the buffer areas and in the floodway according to the criteria provided in the San Diego River Element, with lookouts developed at strategic areas along the river bends to afford views of the habitat areas.	Consistent – The project proposes extension of the paved multi-use river trail from the Town and Country Hotel parcel to the east through the open space park area proposed at the northern end of the site.
C. Open Space	
Objective: Protect existing and future development from flood hazard.	Consistent – The project development is protected from flood hazard, as required for compliance with the City of San Diego development code (see EIR section 5.7).
Objective: Preserve and maintain the wetlands and riparian habitat areas along both sides of the river.	Consistent – The project does not impact wetlands or associated riparian habitat.
Objective: Enhance and maintain the aesthetic and recreational qualities of the river corridor as part of an open space system.	Consistent – The aesthetic and recreational qualities of the river corridor will be preserved through the creation of the public open space park and public trail at the north end of the development site.
Guideline: Planned commercial/residential developments (PCD/PRD) located adjacent to the river corridor should use the river corridor area immediately adjacent to the flood control facility to fulfill their open space or landscaped area requirements.	Consistent – The river corridor area within the project site will be used to provide the multi-use trail and public pocket park.
Guideline: Individual development projects located along the river corridor should be processed as specific plans or as planned developments and reviewed with adjacent (previously adopted) projects in mind in order to ensure the connection of roads, transit alignment, walkways and bikeways.	Consistent – The project is being developed as a Master Plan within the City of San Diego.

Guideline: Develop a continuous pedestrian walkway and bikeway along the river consistent with the San Diego River Park Master Plan Design Guidelines.	Consistent – The project proposes extension of the paved multi-use river trail for pedestrians, bikes and emergency access from the Town and Country Hotel property to the east through the open space park area proposed at the northern end of the site.
D. Conservation	
Objective: Protect and enhance the quality of Mission Valley's air and water resources.	Consistent – As discussed in EIR Sections 5.3 (Greenhouse Gas Emissions), 5.7 (Hydrology), 5.11 (Water Quality), and 7.0 (Effects Found Not to be Significant), the proposed project would not result in significant air quality or water resource impacts. By providing a mixed use, transit oriented project, air emissions would be reduced compared to a similarly-sized, single-use project without transit availability.
Guideline: Conserve the Valley's water, land, and energy resources.	Consistent – Water resources would not be affected because construction and operations BMPs would be installed and maintained by the Applicant. Land and energy resources would be conserved because the project is a compatible, mixed use, transit oriented project.
E. Urban Design	
Guideline: The 100-year floodway zone protection should be maintained within the valley.	Consistent – The project development is protected from flood hazard, as required for compliance with the City of San Diego development code (See EIR section 5.7).
Guideline: The floodway should be designed as a natural appearing waterway with rehabilitation, revegetation and/or preservation of native wetland habitats. Open water, freshwater marsh areas, riparian woodlands, buffer areas and passive recreation areas should be designed in concert so as to form a complete open space system along the river.	Consistent – The floodway along the river does not encroach into the project site.
Multiple Use Development Option	
Objective: Provide new development and redevelopment which integrates various land uses into coordinated multi-use projects.	Consistent – The proposed project integrates new residential, commercial retail, and public parkland uses with existing office and industrial uses.

Proposal: Include a variety of revenue-producing uses in each large-scale multi-use project.	Consistent – The proposed project includes a variety of revenue-producing uses, including new residential and commercial retail uses, as well as the existing office and industrial uses.
Proposal: Ensure functional and physical integration of the various uses within the multi-use project and between adjacent uses or projects.	Consistent – The proposed project includes significant functional and physical integration of project components, including uninterrupted pedestrian connections, both within the project and to adjacent developments, as well as a permanent pedestrian linkage to the nearest transit station.
Development Guideline: Multi-use development projects should include all of the following design elements: (a) Separate vehicular access and delivery loading zones. (b) People-oriented spaces. (c) Compatibility with adjacent development. (d) Uninterrupted pedestrian connections.	Consistent – The proposed project includes: (a) separate vehicular access and delivery loading zones for the commercial and industrial uses, (b) private courtyard and public parkland spaces for residents and visitors to congregate, (c) compatibility with adjacent development, as documented in the Collocation/Conversion Suitability Factors Analysis (Appendix L of this EIR), and (d) uninterrupted pedestrian connections, as documented in EIR Section 5.2 (Transportation/Circulation/Parking).
Development Guideline: Encourage activity on a 24-hour basis within a development project by including one or more of the following types of uses in addition to office and retail: (a) Restaurants, (b) Theatres, (c) Hotels, (d) Residences.	Consistent – The proposed project includes two multi-family residential buildings, in addition to office and retail uses.
Development Guideline: Multi-use development projects should be processed and evaluated through the use of PCD permits and/or Specific Plans.	Consistent – The proposed project will be processed and evaluated through a Planned Development Permit.
Characterization: Public transit opportunities and commitments and permanent pedestrian linkages to public transit systems.	Consistent – The proposed project is located 1,200 feet from the Fashion Valley Transit Center and enhances the permanent pedestrian access from the site to the transit center.
Characterization: Interconnection of project components through an elaborate pedestrian circulation network (e.g., subterranean concourses, walkways and plazas at grade and aerial bridges between buildings).	Consistent – Pedestrian linkages are provided throughout the project site. A pedestrian walkway/bicycle path connects Camino De La Reina to the pedestrian promenade along The San Diego River,

	ultimately connecting to the Fashion Valley Transit Center. Pedestrian linkages within the site are provided between the existing office and print facility through the main entry plaza connecting to the residential buildings and ultimately to the promenade along The San Diego River.
Characterization: Multi-use projects may also include separate structures on separate parcels of land providing that the creation of parcels and designation of uses is the result of a plan approved for the entire designated project and it meets the basic criteria for a multi-use project.	Consistent – The proposed project consists of three parcels centered around a locally focused plaza providing for structural integration of all uses on the site. Office, residential, and retail uses, and a riverfront pedestrian promenade and open space pocket park are all provided on-site as interconnected uses.
Policy: Provide a landscaping plan to tie the various uses together.	Consistent – The proposed project includes a landscaping plan complete with pedestrian focal points.
Policy: Provide careful positioning of key project components around centrally located focal points (e.g., a shopping gallery or hotel containing a large central court).	Consistent – The proposed project features two circular plazas centered on the site between all uses. The sidewalk from Camino De La Reina connects to a pedestrian plaza with paved crosswalks connecting to the main shared vehicular/pedestrian plaza centered between the existing print facility and office (including the retail space connecting to the print facility) and the two residential buildings. This site design creates a flow between each use connecting residents to retail, employees to retail, residents to employment opportunities, and employees to their place of residence.

Source: City of San Diego, 2015; BRG Consulting, Inc. 2015

C. City of San Diego Multiple Species Conservation Program Subarea Plan

In Section 1.4.3 of the MSCP Subarea Plan, the Land Use Adjacency Guidelines state that land uses adjacent to the MHPA will be managed to ensure minimal impacts to the MHPA. In Section 1.5.2 of the MSCP Subarea Plan, General Management Directives relevant to the entire City MHPA system are provided. Table 5.1-3 lists the relevant Land Use Adjacency Guidelines and General Management Directives that the MSCP Subarea Plan states shall be addressed in order to minimize potential impacts and maintain the function of the MHPA. Additional discussion of the project's compliance with the MSCP can be found in EIR Section 5.4, Biological Resources. As identified in Table 5.1-3 the proposed project is consistent with the MSCP Land Use Adjacency Guidelines and General Management Directives and no impact is identified. However, to ensure that implementation of the proposed project complies with the guidelines, Mitigation Measure LU-1, identified below, shall be implemented.

Table 5.1-3
City of San Diego MSCP Subarea Plan – Consistency Analysis

Recommendation	Project Consistency
Drainage – All new and proposed parking lots and developed areas in and adjacent to the preserve must not drain directly into the MHPA. All developed and paved areas must prevent the release of toxins, chemicals, petroleum products, exotic plant materials and other elements that might degrade or harm the natural environment or ecosystem processes within the MHPA. This can be accomplished using a variety of methods including natural detention basins, grass swales or mechanical trapping devices. These systems should be maintained approximately once a year, or as often as needed, to ensure proper functioning. Maintenance should include dredging out sediments if needed, removing exotic plant materials, and adding chemical-neutralizing compounds (e.g., clay compounds) when necessary and appropriate.	Consistent – As described in the hydrology/drainage study (Appendices F1 and F2) and Water Quality Technical Report (Appendices G1 and G2), bio-retention facilities are proposed within landscaped areas and will be accessed via storm drain infrastructure and maintained by the applicant. Additionally, a full Storm Water Pollution Prevention Plan for Construction Activities (SWPPP) will be developed and implemented for the project.
Toxics - Land uses, such as recreation and agriculture, that use chemicals or generate by-products such as manure, that are potentially toxic or impactive to wildlife, sensitive species, habitat, or water quality need to incorporate measures to reduce impacts caused by the application and/or drainage of such materials into the MHPA. Such measures should include drainage/detention basins, swales, or holding areas with non-invasive grasses or wetland-type native vegetation to filter out the toxic materials. Regular maintenance should be provided. Where applicable, this requirement should be incorporated into leases on publicly owned property as leases come up for renewal.	Consistent – The project will be designed and built in conformance with stormwater regulations to control toxic runoff as outlined in the drainage discussion above. During construction activities, standard construction BMPs will be implemented in accordance with stormwater regulations to protect against pollutants.
Lighting - Lighting of all developed areas adjacent to the MHPA should be directed away from the MHPA. Where necessary, development should provide adequate shielding with non-invasive plant materials (preferably native), berming, and/or other methods to protect the MHPA and sensitive species from night lighting.	Consistent – As discussed in EIR Sections 5.4 (Biology) and 5.10 (Visual Effects), all project lighting shall be shielded and directed away from the MHPA.
Noise - Uses in or adjacent to the MHPA should be designed to minimize noise impacts. Berms or walls should be constructed adjacent to commercial areas, recreational areas, and any other use that may introduce noises that could impact or interfere with wildlife utilization of the MHPA. Excessively noisy uses or activities adjacent to breeding areas must incorporate noise reduction measures and be	Consistent – The San Diego River lies immediately north of the project area and supports suitable habitat for the Least Bell's Vireo. Protocol surveys for this species were performed in spring/summer 2013 and results were negative. As such, no noise

Recommendation	Project Consistency
curtailed during the breeding season of sensitive species. Adequate noise reduction measures should also be incorporated for the remainder of the year.	impacts on sensitive species would occur with project implementation.
Barriers - New development adjacent to the MHPA may be required to provide barriers (e.g., non-invasive vegetation, rocks/boulders, fences, walls, and/or signage) along the MHPA boundaries to direct public access to appropriate locations and reduce domestic animal predation.	Consistent – A public multi-use trail adjacent to the River is planned in this area. The majority of the path to be installed by the Applicant would be built on-site rather than north of the parcel in order to minimize impacts and intrusion in adjacent MHPA areas. The public access points will be limited to the public trail entry points as shown on project site plans. Signage will be posted along the north project area to deter entrance into wetland areas and discourage illegal dumping, and trash receptacles will be provided to discourage littering. According to the project landscape architect, signage to deter MHPA entrance will conform to the City of San Diego requirements for quantity, size and content and will be located along the property line within the landscape.
Invasives - No invasive non-native plant species shall be introduced into areas adjacent to the MHPA.	Consistent – No invasive non-native plant species are proposed to be introduced into areas within or adjacent to the MHPA.
Brush Management - New residential development located adjacent to and topographically above the MHPA (e.g., along canyon edges) must be set back from slope edges to incorporate Zone 1 brush management areas on the development pad and outside of the MHPA. Zones 2 may be located in the MHPA upon granting of an easement to the City (or other acceptable agency) except where narrow wildlife corridors require it to be located outside of the MHPA. Zone 2 will be increased by 30 feet, except in areas with a low fire hazard severity rating where no Zone 2 would be required. Brush management zones will not be greater in size that is 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. Vegetation clearing shall be done consistent with City standards and	Consistent – All brush management activities would be limited to the project site and would not encroach in to the MHPA on the adjacent northern parcel.

Recommendation	Project Consistency
shall avoid/minimize impacts to covered species to the maximum extent possible. For all new development, regardless of the ownership, the brush management in the Zone 2 area will be the responsibility of a homeowners association or other private party.	
General Management Directives (Public Access, Trails, and Recreation)	
1. Provide sufficient signage to clearly identify public access to the MHPA. Barriers such as vegetation, rocks/boulders or fencing may be necessary to protect highly sensitive areas. Use appropriate type of barrier based on location, setting and use. For example, use chain link or cattle wire to direct wildlife movement, and natural rocks/boulders or split rail fencing to direct public access away from sensitive areas. Lands acquired through mitigation may preclude public access in order to satisfy mitigation requirements.	Consistent – The only access to the MHPA will be to the City-planned trail. Access to this area will be identified via project signage and will include a fence between the trail and sensitive MHPA lands. The public access points will be limited to the public trail entry points as shown on project site plans. Signage will be posted along the north project area to deter entrance into wetland areas and discourage illegal dumping, and trash receptacles will be provided to discourage littering.
2. Locate trails, view overlooks, and staging areas in the least sensitive areas of the MHPA. Locate trails along the edges of urban land uses adjacent to the MHPA, or the seam between land uses (e.g., agriculture/habitat), and follow existing dirt roads as much as possible rather than entering habitat or wildlife movement areas. Avoid locating trails between two different habitat types (ecotones) for longer than necessary due to the typically heightened resource sensitivity in those locations.	Consistent – The trail has been routed onto the project site (which is currently developed) rather than to the north in order to minimize impacts and intrusion into MHPA areas. Much of the remainder of the trail location was established by the City, and analyzed and permitted under the Town and Country project, with the exception of the 100' connector. The trail connection utilized the most direct route possible while still achieving City trail standards, will not occur between ecotones, and will not result in impacts on any sensitive native habitats.
3. In general, avoid paving trails unless management and monitoring evidence shows otherwise. Clearly demarcate and monitor trails for degradation and off-trail access and use. Provide trail repair/maintenance as needed. Undertake measures to counter the effects of trail erosion including the use of stone or wood crossjoints, edge plantings of native grasses, and mulching of the trail.	Consistent – The trail will be composed of a porous material, will be unlit, and will slope slightly away from the river in order to prevent erosion and runoff. Once built, the trail will be part of the City's regional trail system and will be maintained by the City.

Recommendation	Project Consistency
4. Minimize trail widths to reduce impacts to critical resources. For the most part, do not locate trails wider than four feet in core areas or wildlife corridors. Exceptions are in the San Pasqual Valley where other agreements have been made, in Mission Trails Regional Park, where appropriate, and in other areas where necessary to safely accommodate multiple uses or disabled access. Provide trail fences or other barriers at strategic locations when protection of sensitive resources is required.	Consistent – The trail will be five-feet wide; however, this exception was considered in order to make the trail compliant with the Americans with Disabilities Act. The project is still considered consistent with this directive as it achieves the general goal of minimizing trail widths while accommodating disabled access. The trail will be fenced in order to protect adjacent sensitive biological resources.
5. Limit the extent and location of equestrian trails to the less sensitive areas of the MHPA. Locate staging areas for equestrian uses at a sufficient distance (e.g., 300-500 feet) from areas with riparian and coastal sage scrub habitats to ensure that the biological values are not impaired.	Consistent – The trail will be not be used as an equestrian trail.
6. Off-road or cross-country vehicle activity is an incompatible use in the MHPA, except for law enforcement, preserve management or emergency purposes. Restore disturbed areas to native habitat where possible or critical, or allow to regenerate.	Consistent – No off-road or cross-country vehicle activity will be allowed on the trail.
7. Limit recreational uses to passive uses such as bird watching, photography and trail use. Locate developed picnic areas near MHPA edges or specific areas within the MHPA, in order to minimize littering, feeding of wildlife, and attracting or increasing populations of exotic or nuisance wildlife (opossums, raccoons, skunks). Where permitted, restrain pets on leashes.	Consistent – The trail will be for passive use only. The project will include a public area within an existing developed area that will connect with the trail. The space will be a commercial area so will be regularly maintained with trash collection, etc.
8. Remove homeless and itinerant worker camps in habitat areas as soon as found pursuant to existing enforcement procedures.	Consistent – By incorporating a formal trail, homeless and itinerant worker camps will likely be discouraged by the presence of trail users and adjacent commercial spaces and homes.
9. Maintain equestrian trails on a regular basis to remove manure (and other pet feces) from the trails and preserve system in order to control cowbird invasion and predation. Design and maintain trails where possible to drain into a gravel bottom or vegetated (e.g., grass-lined) swale or basin to detain runoff and remove pollutants.	Consistent – The trail will not include equestrian use.

Recommendation	Project Consistency
General Management Directives (Litter/Trash and Materials Storage)	
1. Remove litter and trash on a regular basis. Post signage to prevent and report littering in trail and road access areas. Provide and maintain trash cans and bins at trail access points.	Consistent – Once built, the trail will be part of the City's regional trail system and will be maintained by the City. Trash cans will be provided within the public space at the north end of the project, and trash will be collected in all bins regularly.
2. Impose penalties for littering and dumping. Fines should be sufficient to prevent recurrence and also cover reimbursement of costs to remove and dispose of debris, restore the area if needed, and to pay for enforcement staff time.	Consistent – Not applicable to project.
3. Prohibit permanent storage of materials (e.g., hazardous and toxic chemicals, equipment, etc.) within the MHPA and ensure appropriate storage per applicable regulations in any areas that may impact the MHPA, due to potential leakage.	Consistent – The project does not propose any storage within the MHPA.
4. Keep wildlife corridor undercrossings free of debris, trash, homeless encampments, and all other obstructions to wildlife movement.	Consistent – No wildlife corridor undercrossings occur in the project area.
5. Evaluate areas where dumping recurs for the need for barriers. Provide additional monitoring as needed (possibly by local and recreational groups on a "Neighborhood Watch" type program), and/or enforcement.	Consistent – Not applicable to project. Once built, the trail will be part of the City's regional trail system and will be maintained by the City.
Adjacency Management Issues	
1. Enforce, prevent and remove illegal intrusions into the MHPA (e.g., orchards, decks, etc.) on an annual basis, in addition to complaint basis.	Consistent – Not applicable to project. Once built, the trail will be part of the City's regional trail system and will be maintained by the City.
2. Disseminate educational information to residents adjacent to and inside the MHPA to heighten environmental awareness, and inform residents of access, appropriate plantings, construction or disturbance within MHPA boundaries, pet intrusion, fire management, and other adjacency issues.	Consistent – Not applicable to project. Once built, the trail will be part of the City's regional trail system and will be maintained by the City.

Recommendation	Project Consistency
3. Install barriers (fencing, rocks/boulders, vegetation) and/or signage where necessary to direct public access to appropriate locations.	Consistent – The project will include signage that identifies trail access points, and trails will be fenced to direct public access to approved trail areas.
4. Do not introduce invasive non-native species into the MHPA. Provide information on invasive plants and animals harmful to the MHPA, and prevention methods, to visitors and adjacent residents. Encourage residents to voluntarily remove invasive exotics from their landscaping.	Consistent – No invasive non-native plant species are proposed to be introduced into areas within or adjacent to the MHPA.
5. Remove giant reed, tamarisk, pampas grass, castor bean, artichoke thistle, and other exotic invasive species from creek and river systems, canyons and slopes, and elsewhere within the MHPA as funding or other assistance becomes available. If possible, it is recommended that removal begin upstream and/or upwind and move downstream/downwind to control reinvasion. Priorities for removal should be based on invasive species' biology (time of flowering, reproductive capacity, etc.), the immediate need of a specific area, and where removal could increase the habitat available for use by covered species such as the least Bell's vireo. Avoid removal activities during the reproductive seasons of sensitive species and avoid/ minimize impacts to sensitive species or native habitats. Monitor the areas and provide additional removal and apply herbicides if necessary. If herbicides are necessary, all safety and environmental regulations must be observed. The use of heavy equipment, and any other potentially harmful or impact-causing methodologies, to remove the plants may require some level of environmental or biological review and/or supervision to ensure against impacts to sensitive species.	Consistent – Not applicable to project. Once built, the trail will be part of the City's regional trail system and will be maintained by the City. A portion of the parcel to the north of the UT project site is planned for use by Town & Country to mitigate impacts of that development in wetlands downstream of the UT site. This mitigation will include removal of invasive species.
6. If funding permits, initiate a baseline survey with regular follow-up monitoring to assess invasion or re-invasion by exotics, and to schedule removal. Utilize trained volunteers to monitor and remove exotic species as part of a neighborhood, community, school, or other organization's activities program (such as Friends of Peñasquitos Preserve has done). If done on a volunteer basis, prepare and provide information on methods and timing of removal to staff and the public if requested. For giant reed removal, the Riverside County multi-jurisdictional management effort and experience should be investigated and relevant techniques used. Similarly, tamarisk removal should use the Nature Conservancy's experience in the Southern	Consistent – Not applicable to project. MHPA areas to the north of the project are part of the City's MHPA and are managed and maintained by the City.

Recommendation	Project Consistency
California desert regions, while artichoke thistle removal should reference the Nature Conservancy's experience in Irvine. Other relevant knowledge and experience is available from the California Exotic Pest Plant Council and the Friends of Los Peñasquitos Canyon Preserve.	
7. Conduct an assessment of the need for cowbird trapping in each area of the MHPA where cattle, horses, or other animals are kept, as recommended by the habitat management technical committee in coordination with the wildlife agencies.	Consistent – Not applicable to project. MHPA areas to the north of the project are part of the City's MHPA and are managed and maintained by the City.
8. If eucalyptus trees die or are removed from the MHPA area, replace with appropriate native species. Ensure that eucalyptus trees do not spread into new areas, nor increase substantially in numbers over the years. Eventual replacement by native species is preferred.	Consistent – The project would include removal of Eucalyptus trees now present at the north edge of the property and adjacent to the MHPA. MHPA areas to the north of the project are part of the City's MHPA and are managed and maintained by the City.
9. On a case by case basis some limited trapping of non-native predators may be necessary at strategic locations, and where determined feasible to protect ground and shrub-nesting birds, lizards, and other sensitive species from excessive predation. This management directive may be considered a Priority 1 if necessary to meet the conditions for species coverage. If implemented, the program would only be on a temporary basis and where a significant problem has been identified and therefore needed to maintain balance of wildlife in the MHPA. The program would be operated in a humane manner, providing adequate shade and water, and checking all traps twice daily. A domestic animals release component would be incorporated into the program. Provide signage at access points and noticing of adjacent residents to inform people that trapping occurs, and how to retrieve and contain their pets.	Consistent – Not applicable to project. MHPA areas to the north of the project are part of the City's MHPA and are managed and maintained by the City.
10. Perform standard maintenance, such as clearing and dredging of existing flood channels, during the non-breeding or nesting season of sensitive bird or wildlife species utilizing the riparian habitat. For the least Bell's vireo, the non-breeding season generally includes mid-September through mid- March.	Consistent – Not applicable to project. MHPA areas to the north of the project are part of the City's MHPA and are managed and maintained by the City.

Recommendation	Project Consistency
11. Review existing flood control channels within the MHPA periodically (every five to ten years) to determine the need for their retention and maintenance, and to assess alternatives, such as restoration of natural rivers and floodplains.	Consistent – Not applicable to project. MHPA areas to the north of the project are part of the City's MHPA and are managed and maintained by the City.
Directive B15	
Directive B15 - Native vegetation shall be restored as a condition of future development proposals along this portion of the San Diego River corridor.	Not applicable - Figure 4 of the City's MSCP Subarea Plan includes a specific guideline map note immediately west of the project area, which requires native vegetation to be restored as a condition of future development proposals along this portion of the river corridor. However, the adjacent river corridor property is owned by Town and Country LLC and is planned for mitigation use by Town & Country. Therefore, restoration and enhancement planning for this area is not part of the proposed project.

Source: City of San Diego, 2014; Rocks Biological Consulting, 2015; BRG Consulting, Inc. 2014

D. San Diego River Park Master Plan

The San Diego River Park Master Plan contains numerous policy recommendations and design guidelines. The policy recommendations are classified as either General (for the entire River Park Area) or Specific (for a particular reach such as the Lower Valley). The project has been designed in accordance with all applicable design guidelines for both the River Corridor Area and River Influence Area. The City will ensure the project's compliance of the applicable design guidelines upon approval of the Final Design Plan for the project.

General Recommendations

The General Recommendations are divided into five objective categories: (1) Restore and maintain a healthy river system, (2) Unify fragmented lands and habitats, (3) Create a connected continuum, with a sequence of unique places and experiences, (4) Reveal the river valley history, and (5) Reorient development toward the river to create value and opportunities for people to embrace the river. The General Recommendations applicable to the proposed project, and the proposed project's consistency with these recommendations, are summarized in Table 5.1-4 below.

Table 5.1-4
San Diego River Park Master Plan General Recommendations – Consistency Analysis

Recommendation	Project Consistency
3.1.1 D. Encourage the growth of appropriate native riparian and upland vegetation.	Consistent – The project's landscape plan includes appropriate native riparian and upland vegetation and removal of invasive vegetation required for compliance with the City of San Diego Land Development Code.
3.1.1 H. Future development projects should incorporate hydrology and water quality considerations in all planning and guidance documents and monitor water quality following implementation of the projects.	Consistent – The hydrology/drainage study (Appendices F1 and F2) and Water Quality Technical Report (Appendices G1 and G2) were reviewed by the landscape architect and were taken into consideration when developing the project's landscape plans.
3.1.2 A. Establish appropriate corridors for the river, wildlife and people.	Consistent – The project excludes development within the 35-foot wide River Corridor Area immediately south of the FEMA 100-year floodway boundary, as required for compliance with the City of San Diego Land Development Code.
3.1.2 C. Eliminate invasive plant species and reintroduce native species.	Consistent – See response to recommendation 3.1.1 D above.
3.1.3 A. Create a continuous multi-use San Diego River pathway.	Consistent – The project proposes extension of the paved multi-use river trail for pedestrians, bikes, and emergency access from the Town and Country Hotel parcel to the east through the open space park area proposed at the northern end of the site.
3.1.3 G. Integrate art into the identity and experience of the San Diego River Park.	Consistent – Publicly accessible art is incorporated into the proposed project in the form of a sculpture garden to be located within the public pocket park area.
3.1.5 A. Treat the river as an amenity.	Consistent – The proposed project treats the river as a desirable feature by taking advantage of the open space it creates, and connects to the river pathway system.
3.1.5 B. Encourage development to provide active uses fronting the river.	Consistent – The proposed project will provide a mix of housing and public open space, both fronting the river.

Recommendation	Project Consistency
3.1.5 C. Encourage development to face the river.	Consistent – The proposed river trail park and public pocket park on the north end of the site are amenities that will be oriented toward the river and designed to promote use of the open space area within the corridor. The residential development also faces the river to the north.
3.1.5 D. Include access to the river through new development.	Consistent – Access to the public multi-use trail and public pocket park will be available through the proposed project's public street frontage on Camino de la Reina.
3.1.5 G. Create "Green Streets."	Consistent – The proposed project has been designed to protect in place 24 of the existing mature trees along the Camino de la Reina Street frontage, including 19 California Sycamores, four Torrey Pines, and one Indian Laurel. The preservation of these trees will maintain the existing visual character of the area to the fullest extent feasible. The streetscape is being supplemented with additional parkway trees, groundcover, and low growing shrubs.
3.1.5 H. Enhance development edges facing the river with active uses.	Consistent – See response to 3.1.5 C above.

Source: City of San Diego, 2013; BRG Consulting, Inc. 2013

Specific Recommendations

The specific recommendations for the Lower Valley reach and the proposed project's consistency with these recommendations are summarized in Table 5.1-5 below.

Table 5.1-5
San Diego River Park Master Plan Specific Recommendations – Consistency Analysis

Recommendation	Project Consistency
1. Support the goals of the Mission Valley Preserve and provide additional interpretive signs on the role of the San Diego River in the Preserve.	Consistent – Interpretive signs for the San Diego River Park trail are included as part of the planned development.
2. Provide a connection between the San Diego River pathway and Presidio Park and a kiosk at Presidio Park to identify the river pathway. Provide a connection between Sefton Field to the south of the river and the YMCA to the north.	Not applicable – Project site not near Presidio Park.

Recommendation	Project Consistency
3. Explore options at the Riverwalk Golf Course to extend the river pathway along the trolley corridor as a short term measure until the Riverwalk Golf Course is redeveloped into a multi-use development. When the redevelopment occurs, extend the river pathway along the River Corridor.	Not applicable – Riverwalk Golf Course is more than 1,000 feet west of the project site.
4. Pursue opportunities to address the hydrology of the river, to provide public parks and to orient the new development toward the river in Specific Plan areas, if amended.	Consistent – Project provides a new public multi-use trail and public pocket park oriented along the River.
5. Coordinate with Caltrans to establish "green gateways" at the intersection of State Highway 163 and Interstate 805 and the river valley by revegetating the freeway right-of-ways with native vegetation.	Not applicable – Project site not adjacent to the intersection of Highway 163 and I-805.
6. Construct bike and pedestrian crossings for the existing river pathway at FSDRIP at public street intersections, including Mission Center Road, Camino del Este and Qualcomm Way.	Not applicable – No existing river pathway or crossings at project site.
7. Create trail connections to the southern canyons of the Lower Valley, including Buchanan and Normal Heights Canyon, and to the northern canyons, including Murray, Murphy and Ruffin Canyons.	Not applicable – No connection to canyons at project site.
8. Create the river pathway connection from Fenton Parkway to I-15 and pursue opportunities to provide a pedestrian/bicycle connection over the river from Qualcomm Way to Mission City Parkway.	Not applicable – Project site 2 miles from Fenton Parkway.
9. Consider public recreation, the San Diego River pathway and a naturalized open space along the river when planning any future use of the City's property at the Qualcomm Stadium site.	Not applicable as the project is not near Qualcomm Stadium.
10. Provide interpretive signage along the river pathway about the rich history of the Lower Valley.	Consistent – interpretive signs for the San Diego River Park trail are included as part of the planned development.

Source: City of San Diego, 2013; BRG Consulting, Inc. 2013

E. Zoning/Mission Valley Planned District

The majority of the project site is located within the Industrial zone (MV-I) of the Mission Valley Planned District. The project site includes a small portion of land zoned OF-1-1 (Open Space – Floodplain) at the northeast corner of the property; however, no development is proposed in this area.

Per SDMC §1514.0306, the purpose of the MV-I zone is to supplement the design criteria of the Industrial-Light base zone (IL-2-1). Uses allowed within the IL-2-1 zone include a mix of light industrial and office uses with limited

commercial. The proposed project is a multiple-use development, because although the project is title "Mixed Use" the project is proposing to develop uses that are currently not provided on the site to make the site a multiple use site. The proposed project includes multi-family residential and retail commercial land uses, along with the existing on-site office and industrial (manufacturing) uses; however, residential land uses generally are not permitted within the IL-2-1 zone.

In order to permit greater flexibility in project design than is possible through strict application of conventional zoning regulations, City of San Diego planning staff has determined that the project may utilize the Mission Valley Community Plan's Multiple Use Option for development of the proposed project. Multi-use projects may also include separate structures on separate parcels of land providing that the creation of parcels and designation of uses is the result of a plan approved for the entire designated project and it meets the basic criteria for a multi-use project.

In accordance with the Multiple Use Option for developers, the proposed project is seeking an application through aPDP. Under SDMC 143.0403(a)(1), a PDP allows uses identified in the applicable land use plan when not allowed in the applicable base zone, such as residential uses. Through the Multiple Use Option, the proposed project is in conformance with zoning requirements, as long as the conditions specified in the PDP are satisfied and the appropriate findings are made.

Multiple Use Option developments contain two or more significant revenue-producing uses such as retail, office, and residential, all of which are components of the project site. They also include significant functional and physical integration of project components, including uninterrupted pedestrian connections, both within the project and to adjacent developments, as well as a permanent pedestrian linkage to the nearest transit station. Specifically, there are multiple well-connected focal points such as the pedestrian pathway connecting from the main entry to the site passing between the residential towers and ultimately leading to the San Diego River Park pedestrian promenade. This promenade provides access to the Fashion Valley Transit Station to the west and a pocket park located on the northeast corner of the property.

5.1.2.2 Significance of Impact

The project does not conflict with the stated goals, objectives, and recommendations of the City of San Diego General Plan, the Multiple Species Conservation Program (MSCP), the Mission Valley Community Plan, the San Diego River Park Master Plan, or the Mission Valley Planned District. However, to ensure that implementation of proposed project complies with the guidelines of the MSCP, Mitigation Measure LU-1, identified below, shall be implemented. Therefore, a less than significant land use impact is identified with the implementation of the proposed project for this issue area.

5.1.2.3 Mitigation, Monitoring, and Reporting

Although the project was found to be consistent with applicable land use plans, the following mitigation measure is provided in order to ensure there would be no significant land use impact specifically related to proposed project's compliance with the MSCP.

LU-1 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 Multi-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:

A. Drainage – 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.

B. Toxics/Project Staging Areas/Equipment Storage – Projects that use chemicals or generate by-products such as pesticides, herbicides, and animal waste, and other substances that are potentially toxic or impactive 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 shall be allowed outside any approved construction limits. Provide a note in/on the CD's that states: *"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."*

C. Lighting – 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 such lighting is necessary for public safety.

D. Barriers – 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.

E. Invasives – No invasive non-native plant species shall be introduced into areas within or adjacent to the MHPA.

F. Brush Management – 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 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.

G. Noise - Several sensitive bird species were observed during the biological field work conducted by Rocks Biological Consulting, Inc. However, these species were observed offsite and not within the proposed project impact area. Generally, the 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 Section 5.4 – Biological Resources of this EIR, impacts would be reduced to a level of significance.

5.1.2.4 Impacts After Mitigation

Mitigation Measure LU-1 was provided in order to ensure there would be no significant land use impact specifically with regard to project compliance with the MSCP. Therefore, with the implementation of Mitigation Measure LU-1, impacts would remain less than significant.

5.1.3 Issue 2

Issue 2: A significant land use impact would occur if the proposed project would require a deviation or variance.

5.1.3.1 Impact Analysis

The City of San Diego's CEQA Significance Determination Thresholds outlines the thresholds for determination relevant to the proposed project. The following would be considered significant land use impacts:

- *If the proposed project would require a deviation or variance, and the deviation or variance would in turn result in a physical impact on the environment.*

As shown on the retaining wall plan (Figure 3-5), the proposed project includes a deviation to allow a retaining wall along the west side setback with a height of 10-15 feet, where a maximum height of 9 feet is allowed. The deviation would be from San Diego Municipal Code Section 142.0340 (Retaining Wall Regulations in All Zones), 142.0370 (Construction Materials for Fences and Retaining Walls), and from Section 1514.0302(c) of the Mission Valley Planned District Ordinance (San Diego River Subdistrict).

Secondary visual quality impacts may occur as a result of a retaining wall that exceeds the maximum height allowable; however, as discussed in Section 5.10, Visual Effects/Neighborhood Character, no such visual quality impact has been identified for the proposed project. Therefore, approval of the deviation would not result in an impact for this issue area.

Additionally, the project does not comply with the interior side setback requirements between each lot, which would constitute a deviation from San Diego Municipal Code§131.0631 Development Regulations Table for Industrial Zone; however, the deviation would not result in a physical impact on the environment, and so approval of the deviation would not result in an impact for this issue area.

5.1.3.2 Significance of Impact

There is no significant land use impact associated with this issue area.

5.1.3.3 Mitigation, Monitoring, and Reporting

Because there is no significant land use impact associated with this issue area, there are no associated mitigation, monitoring, or reporting measures required.

5.1.3.4 Impacts After Mitigation

Because there is no significant land use impact for this issue area, and therefore no associated mitigation, monitoring, or reporting measures required, there are no impacts after mitigation.

5.1.4 Issue 3

Issue 3: A significant land use impact would occur if the proposed project would physically divide an established community.

5.1.4.1 Impact Analysis

The City of San Diego's CEQA Significance Determination Thresholds outlines the thresholds for determination relevant to the proposed project. The following would be considered significant land use impacts:

- *If the proposed project would physically divide an established community.*

The project site is located on a developed parcel that does not divide any established community, but in fact promotes enhanced circulation throughout the community by extending a multi-use trail through its portion of the planned San Diego River Park. Therefore, there is no land use impact associated with issue area.

5.1.4.2 Significance of Impact

There is no significant land use impact associated with this issue area.

5.1.4.3 Mitigation, Monitoring, and Reporting

Because there is no significant land use impact associated with this issue area, there are no associated mitigation, monitoring, or reporting measures required.

5.1.4.4 Impacts After Mitigation

Because there is no significant land use impact for this issue area, and therefore no associated mitigation, monitoring, or reporting measures required, there are no impacts after mitigation.

5.1.5 Issue 4

Issue 4: A significant land use impact would occur if the proposed project would result in land uses that are not compatible with an adopted Airport Land Use Compatibility Plan (ALUCP).

5.1.5.1 Impact Analysis

The City of San Diego's CEQA Significance Determination Thresholds outlines the thresholds for determination relevant to the proposed project. The following would be considered significant land use impacts:

- *If the proposed project would result in land uses that are not compatible with an adopted Airport Land Use Compatibility Plan (ALUCP).*

The project site is located two miles from the San Diego International Airport (SDIA), but is not located within the SDIA Airport Influence Area (AIA). The project site is located further away from Montgomery Field (3.5 miles), but is located within Review Area 2 of Montgomery Field's AIA.

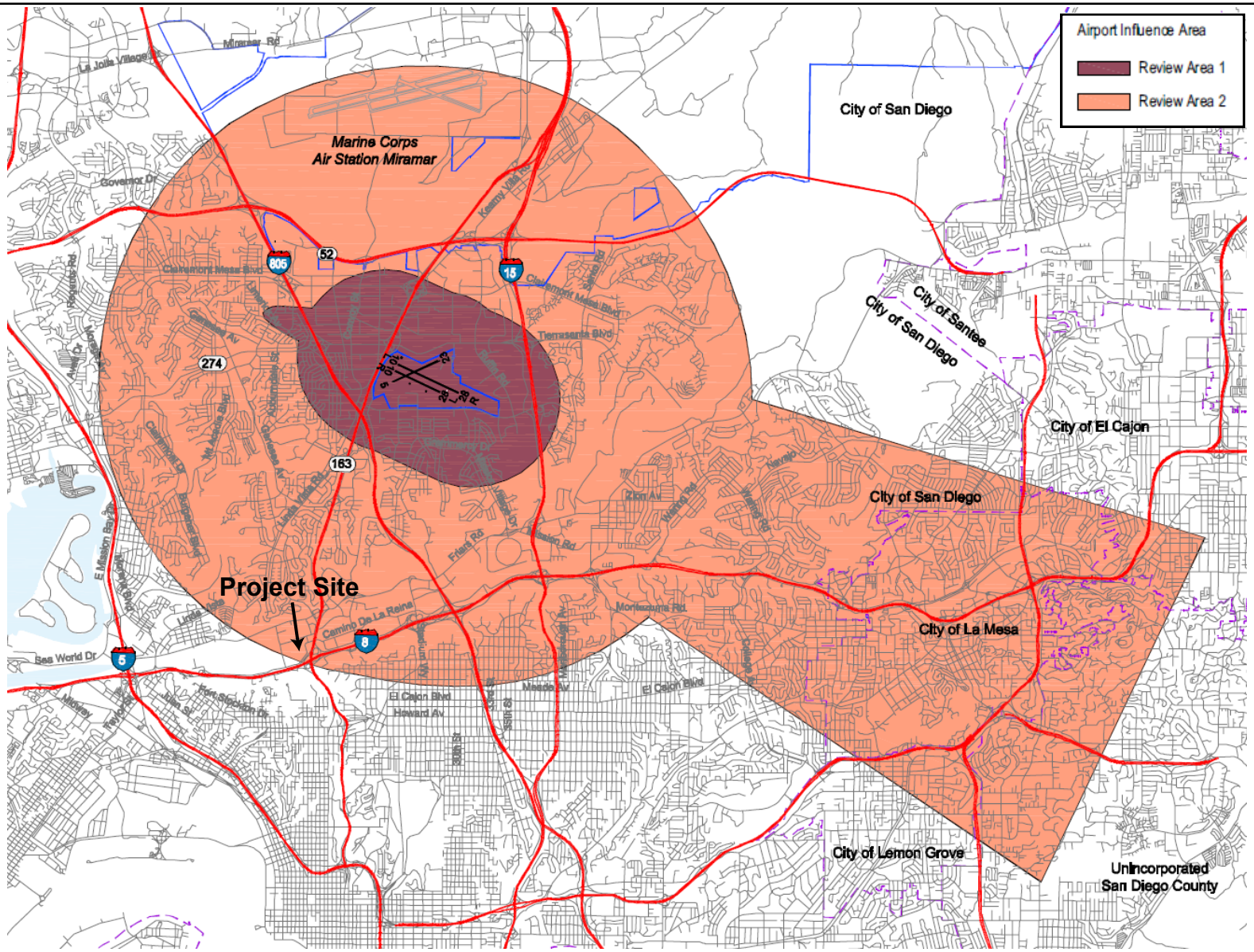
The Montgomery Field AIA is defined as "the area in which current or future airport-related noise, overflight, safety, or airspace protection factors may significantly affect land uses or necessitate restrictions on those uses." To facilitate implementation and reduce unnecessary referrals of projects to the Airport Land Use Committee (ALUC), the AIA is divided into Review Area 1 and Review Area 2, as shown on Figure 5.1-6. Review Area 1 consists of locations where noise and/or safety concerns may necessitate limitations on the types of land uses. Specifically, Review Area 1 encompasses locations exposed to noise levels of community noise level equivalent (CNEL) 60 decibels (dB) or greater together with all of the safety zones depicted on the associated maps in this chapter. Within Review Area 1, all types of land use actions are to be submitted to the ALUC for review to the extent review is required by law.

Review Area 2 consists of locations beyond Review Area 1 but within the airspace protection and/or overflight areas depicted on the associated maps in the Montgomery Field ALUCP. Limits on the heights of structures, particularly in areas of high terrain, are the only restrictions on land uses within Review Area 2. The additional function of this area is to define where various mechanisms to alert prospective property owners about the nearby airport are appropriate. Within Review Area 2, only land use actions for which the height of objects is an issue are subject to ALUC review.

The ALUCP contains four principal compatibility concerns: noise (exposure to aircraft noise), safety (land use factors that affect safety both for people on the ground and occupants of aircraft), airspace protection (protection of airport airspace), and overflight (annoyance or other general concerns related to aircraft overflights). Although the project site is within the Montgomery Field AIA, the project's proposed land uses are compatible with the Montgomery Field ACLUP, and the proposed project would not result in conflicts associated with its four compatibility concern areas.

SDIA and Montgomery Field both require compliance with Federal Aviation Regulation (FAR) Part 77, *Objects Affecting Navigable Airspace*, as part of their ALUCP. The regulations require that anyone proposing to construct an object which could affect the navigable airspace around an airport submit information about the proposed construction to the FAA (Federal Aviation Administration). According to FAR Part 77, this includes any construction exceeding 200 feet above ground level, or any construction within 20,000 feet of an airport which exceeds a 100:1 surface from any point on the runway (FAA, 2012).

The maximum height of the proposed residential buildings are 125 feet, giving it an elevation of 163 feet AMSL (Above Mean Sea Level) because the building site's base elevation is 38 feet AMSL (38+125=163). The buildings would be located 12,900 feet from the nearest edge of the SDIA runway. At this proposed location, the height of a


Airport Influence Area
Review Area 1
Review Area 2
Marine Corps
Air Station Miramar
City of San Diego
City of Santee
City of El Cajon
City of La Mesa
City of Lemon Grove
Unincorporated
San Diego County
Project Site
Miramar Rd
Governor Dr
Clairemont Mesa Blvd
Tierrasanta Blvd
Kearny Villa Rd
Friars Rd
Mission Gorge Rd
Zion Av
Navajo
Camino De La Reina
Montezuma Rd
El Cajon Blvd
Howard Av
Nevada Av
Sea World Dr
Mission Bay Dr
Midway
Rosecrans St
Pacific Beach Dr
Mt Acadia Blvd
Clairemont Dr
Balboa Ave
Genesee Av
Linda Vista Rd
Ashton St
Fort Stockton Dr
Jun St
Ivy St
Mission Gorge Rd
Mission Valley Pkwy
Mission Center Rd
Qualcomm Way
Murphy Canyon Rd
Aero Dr
Mission Bay Dr
Mission Blvd
Ocean View Blvd
Morena Blvd
Clairemont Mesa Blvd
Kearny Mesa Rd
Ruffin Rd
Aero Dr
Convoy St
Ronson Rd
Kearny Villa Rd
Miramar Rd
Scripps Ranch Blvd
Pomerado Rd
Poway Rd
Mira Mesa Blvd
Carmel Mtn Rd
Rancho Bernardo Rd
Bernardo Center Dr
Camino Del Rio N
Camino Del Rio S
Mission Gorge Rd
Fashion Valley Rd
Friars Rd
Zion Av
Navajo
Waring Rd
Fletcher Pkwy
Jackson Dr
Lake Murray Blvd
Parkway
Broadway
Main St
Lemon Grove Av
Imperial Av
Logan Av
Euclid Av
Federal Blvd
Market St
Gamble St
Ocean View Blvd
Coronado Ave
Palm St
Hollister St
Nevada Av
Mississippi Av
Meadow Lark Dr

100:1 surface would be 147 feet AMSL (129 feet above the runway's base elevation of 18 feet). Therefore, the elevation of the buildings would exceed the 100:1 surface elevation by 16 feet, and FAA approval would be required.

The FAA was properly notified, has reviewed, and has approved the previously proposed building heights of 290 feet (332 feet AMSL) and 250 feet (284 feet AMSL) as part of a prior site design that included separate office and residential structures. According to two *Determination of No Hazard to Air Navigation* letters from the FAA dated January 29, 2013, the "aeronautical study revealed that the [office and residential structures] would have no substantial adverse effect on the safe and efficient utilization of the navigable airspace by aircraft or on the operation of air navigation facilities" and that any height exceeding 290 feet above ground level (332 feet AMSL) for the office building or 250 feet above ground level (287 feet AMSL) for the residential building will result in a substantial adverse effect and would warrant a *Determination of Hazard to Air Navigation*. As of April 18, 2014, the Determinations were issued extensions by the FAA certifying that no changes have occurred which would alter the Determinations previously issued. The currently proposed development is in compliance with FAR Part 77, as well as the SDIA and Montgomery Field ALUCP because the currently proposed buildings would have a maximum elevation that would not exceed 250 feet (287 feet AMSL), which was found not to be a hazard by the FAA.

5.1.5.2 Significance of Impact

There is no significant land use impact associated with this issue area.

5.1.5.3 Mitigation, Monitoring, and Reporting

Because there is no significant land use impact associated with this issue area, there are no associated mitigation, monitoring, or reporting measures required.

5.1.5.4 Impacts After Mitigation

Because there is no significant land use impact for this issue area, and therefore no associated mitigation, monitoring, or reporting measures required, there are no impacts after mitigation.

5.1.6 Conclusions

The only land use issue for which the project may have a significant impact is Issue 2, due to the fact that the project would require a deviation to allow retaining walls in excess of 9 feet in height and a deviation with the interior side setback requirements between each lot. However, no secondary environmental impacts as a result of the approval of the deviations were identified. In addition, Mitigation Measure LU-1 will be implemented to ensure consistency of the project with the guidelines of the MSCP. Therefore, the implementation of the proposed project would result in a less than significant land use impact.

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5.2 Transportation/Circulation/Parking

This section of the EIR discusses the potential environmental impacts of the proposed project associated with transportation, circulation, and parking. Information contained in this section is summarized from the *Traffic Impact Analysis (TIA)* prepared by Linscott Law and Greenspan, Engineers (LLG) dated February 12, 2015. (Appendix B of this EIR). This document is provided on the attached CD of Technical Appendices found on the back cover of this EIR.

5.2.1 Existing Conditions

5.2.1.1 Existing Street Network

Figure 5.2-1 depicts the study area established for the proposed project in the traffic impact analysis. The study area for this project encompasses areas of anticipated impact related to the project. The project site is located at 350 Camino De La Reina in the Mission Valley Community within the City of San Diego. The project is located in the northwest quadrant of Interstate 8 (I-8)/State Route 163 (SR-163) interchange, south of Friars Road and Fashion Valley Mall. The surrounding area is composed of a mix of land uses including: retail, hotel, office, and residential. The principle roadways in the study area are identified below:

Study Area Streets

- Avenida Del Rio
- Camino De La Reina
- Hotel Circle North
- Hotel Circle South

5.2.1.2 Existing Pedestrian/Bicycle Conditions

Pedestrian access is provided via sidewalks leading up to the site on Camino De La Reina. In addition, a pedestrian path (approximately 1,200 feet) is also proposed on the northwest corner of the site that runs along the San Diego River and would connect 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. The outdoor plazas fronting the residential towers and the entry court connecting the residential and office uses would provide open pedestrian circulation.

Currently there are no dedicated bike lanes on Camino De La Reina between Hotel Circle and Avenida Del Rio. To promote bicycle mobility, the project proposes a shared Class I Pedestrian Promenade/Bike Path that also serves as a fire access lane at the northeastern corner of the site at the driveway to Camino De La Reina. It traverses to the west passing the pocket park along the River Front where it continues along the westerly project boundary. Bicyclists would also have access to the Fashion Valley Transit Center from the project site by continuing along the proposed riverfront trail, adjacent to the Town & Country Resort, and using the bridge to connect to the Fashion Valley Transit Center. Just south of the river-fronting townhomes in the northwest corner of the site, the pedestrian path would split from the shared bike path/fire lane. The shared bike path/fire lane would then transition through the surface lots on the western project boundary ultimately reconnecting to the Camino De La Reina driveway at the southwest corner of the property.

In addition, at the Near-Term (Opening Day 2017), the project proposes an irrevocable offer of dedication (IOD) and a deferred improvement agreement (DIA) for widening along the project frontage of Camino De La Reina to accommodate its future classification (4-lane Major). By providing an IOD and DIA, the Applicant's widening of Camino De La Reina to half width of a 4-lane Major would accommodate Class II bike lanes along the project frontage, further promoting bicycle mobility.

5.2.1.3 Existing Transit Conditions

The project site is located approximately 1,200 feet (walking distance) from the Fashion Valley Transit Center, one of the major transit hubs in the Mission Valley Community. A dedicated pedestrian path would be constructed by the project (on the project site only) to provide direct connection to the transit center.

The Fashion Valley Transit Center is located on Avenida Del Rio, east of Fashion Valley Road fronting the mall. The transit center provides both regional and local transit facilities through the San Diego Trolley Green Line and Metropolitan Transit System (MTS) bus services, respectively.

Regional transit service is provided by the Trolley Green Line, which runs between Santee and Downtown San Diego. The intermediate stops include Alvarado Medical Center, San Diego State University (SDSU), Qualcomm Stadium, Mission Valley Center, Linda Vista, Old Town and Convention Center. The weekday and weekend headways are approximately 15 minutes.

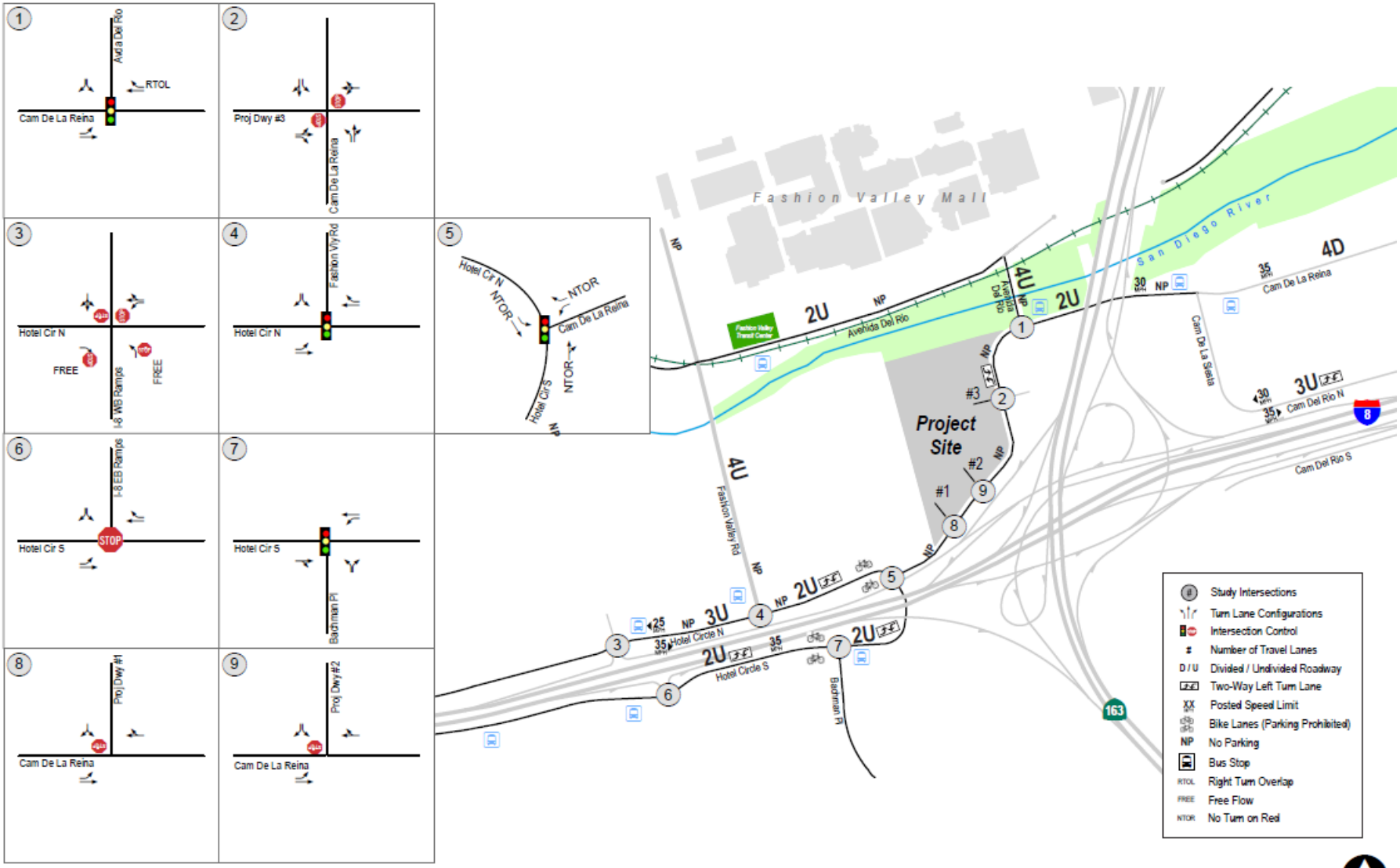
Local transit service is provided by the MTS bus service. The routes serving the transit center include 6, 20, 25, 41, 88, 120 and 928. These bus routes connect the Fashion Valley Mall to Kearny Mesa, UCSD, Old Town, Downtown, Del Lago and North Park.

In addition to the transit center, there are MTS bus stops located approximately 500 feet from the project site at Hotel Circle N / Camino De La Reina intersection (serviced by MTS route 88) and at Avenida Del Rio / Camino De La Reina (serviced by MTS route 6). The bus routes in the study operate with a headway of approximately 10-15 minutes on both weekdays and weekends.

5.2.1.4 Existing Traffic Conditions

A. Existing Traffic Volumes

Peak hour intersection turning movement volume counts and pedestrian counts were performed by LLG at the study area intersections on Thursday September 20th and Tuesday September 25th, 2012. Table 5.2-1 illustrates the existing AM and PM peak hour turning movement counts and average daily traffic volumes. The existing traffic volumes are depicted in Figure 5.2-1. Existing weekday ADT and peak hour (7:00-9:00 AM and 4:00-6:00 PM) volumes were obtained for the freeway segments located within the project study area. The primary source of the volumes was the Caltrans PeMS database. Data was collected from PeMS for midweek weekdays in the month of September 2012 and averaged. In addition, supplementary data such as the 2011 Traffic Volumes Book published by Caltrans was used to validate the traffic volumes trends and growth. Based on these multiple sources, the final existing traffic volumes were developed and balanced. Existing freeway operations are discussed below.



SOURCE: Linscott, Law & Greenspan, 2014

11/18/14

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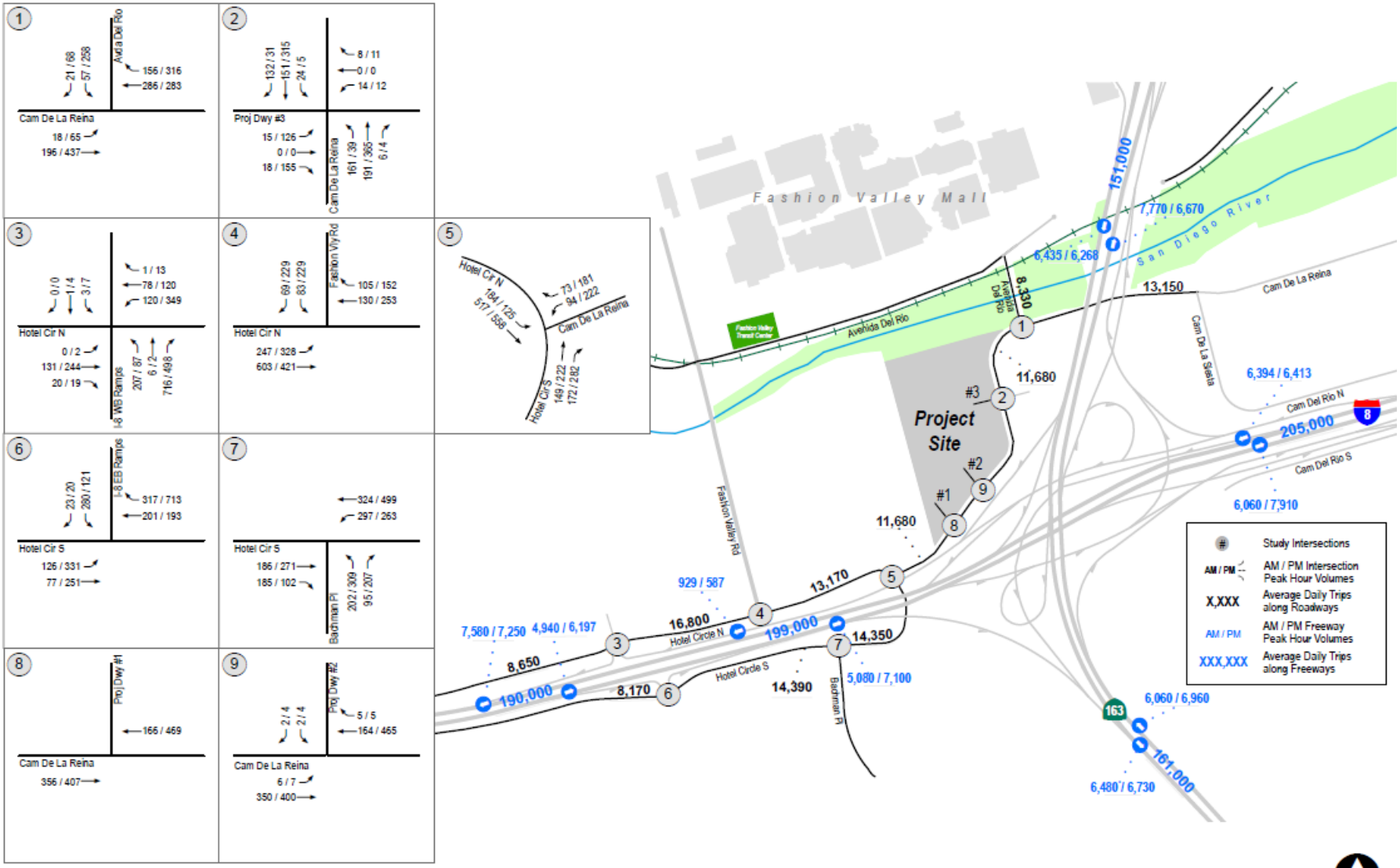
Existing Conditions

FIGURE 5.2-1



SOURCE: Linscott, Law & Greenspan, 2014

11/18/14

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Existing Traffic Volumes

FIGURE 5.2-2

B. Existing Intersection Operations

All of the intersections within the study area were evaluated. Figure 5.2-2 provides the Existing Peak Hour Weekday Traffic Volumes in the study area. As shown in Table 5.2-2, all intersections operate at an acceptable LOS (i.e. LOS D or better) during both the AM and PM peak hours, except for the following intersection:

- Hotel Circle S. /I-8 EB Ramps (LOS F during the PM peak hour)

C. Existing Street Segment Operations

Based on average daily traffic volumes, functional classification and city street standards, existing street segment LOS were determined. Table 5.2-3 summarizes the result of this analysis. All streets in the study area, except for the following segments, presently operate at an LOS C or better:

- Camino De La Reina: Avenida Del Rio to Camino De La Siesta (LOS F)
- Hotel Circle N.: I-8 WB Ramps to Fashion Valley Road (LOS F)
- Hotel Circle N.: Fashion Valley Road to Camino De La Reina (LOS E)
- Hotel Circle S.: I-8 EB Ramps to Bachman Place (LOS E)
- Hotel Circle S.: Bachman Place to Camino De La Reina (LOS E)

D. Existing Freeway Segment Operations

Freeway segments were also analyzed under the existing conditions. All freeway segments, except for the following segments, presently operate at an acceptable level of service, as shown in Table 5.2-4 below:

- SR-163 south of I-8 going northbound (NB), (LOS E in the PM peak hour)
- I-8 between SR-163 and Mission Center Road eastbound (EB), (LOS E in the PM peak hour)

Table 5.2-1
Existing Traffic Volumes

Street Segment	ADT[a]
Avenida Del Rio	
Avenida Del Rio to Camino De La Reina	8,330
Camino De La Reina	
Hotel Circle to Project Driveway	11,680
Project Driveway to Avenida Del Rio	11,680
Avenida Del Rio to Camino De La Siesta	13,150
Hotel Circle N.	
West of I-8 WB Ramps	8,650
I-8 WB Ramps to Fashion Valley Road	16,800
Fashion Valley Road to Camino De La Reina	13,170
Hotel Circle S.	
West of I-8 EB Ramps	8,170
I-8 EB Ramps to Bachman Place	14,390
Bachman Place to Camino De La Reina	14,350

Footnotes:
a: Average Daily Traffic Volumes.
General Notes:
All counts conducted by LLG on Thursday, September 20th and Tuesday, September 25th, 2012.
Source: LLG, 2015

Table 5.2-2
Existing Intersection Operations

Intersection	Control Type	Peak Hour	Existing	
			Delay[a]	LOS[b]
1. Camino De La Reina/ Avenida Del Rio	Signal	AM	7.0	A
		PM	9.4	A
2. Camino De La Reina/ Project Driveway #3	Unsignalized[c]	AM	14.8	B
		PM	16.3	C
3. Hotel Circle N. / I-8 WB Ramps	All Way Stop	AM	11.4	B
		PM	11.0	B
4. Hotel Circle N. / Fashion Valley Road	Signal	AM	19.9	B
		PM	54.3	D
5. Hotel Circle N. / Camino De La Reina	Signal	AM	11.2	B
		PM	15.6	B
6. Hotel Circle S. / I-8 EB Ramps	All Way Stop	AM	13.5	B
		PM	**54.2**	**F**
7. Hotel Circle S. / Bachman Place	Signal	AM	26.8	C
		PM	21.6	C
8. Camino De La Reina / Project Driveway #1	Unsignalized	AM	N/A[d]	-
		PM	N/A[d]	-
9. Camino De La Reina / Project Driveway #2	Unsignalized	AM	10.7	B
		PM	12.3	B

Footnotes:

a. Average delay expressed in seconds per vehicle.
b. Level of Service.
c. MSSC – Minor-Street Stop Controlled intersection. Minor street left turn delay is reported.
d. Project driveway #1 is currently non-accessible (chain-link)

General Notes:

1. **Bold** typeface indicates intersections operating at LOS E or F
   Source: LLG, 2015.
2. N/A – not applicable

SIGNALIZED		UNSIGNALIZED	
DELAY/LOS THRESHOLDS		DELAY/LOS THRESHOLDS	
Delay	LOS	Delay	LOS
0.0 ≤ 10.0	A	0.0 ≤ 10.0	A
10.1 to 20.0	B	10.1 to 15.0	B
20.1 to 35.0	C	15.1 to 25.0	C
35.1 to 55.0	D	25.1 to 35.0	D
55.1 to 80.0	E	35.1 to 50.0	E
≥ 80.1	F	≥ 50.1	F

5.2.1.5 Mission Valley Community Plan Transportation Element

The Mission Valley Community Plan Transportation Element emphasizes that "transportation systems should be well balanced between the individual needs of the various users and the traveling public within that particular community (City, 1985)." The transportation system must offer residents and/or employees the maximum opportunity of transportation choices to fulfill their individual needs and provide a dynamic system for the growth of the community. The following objectives are included as part of the Community Plan Transportation Element:

- To facilitate transportation into, throughout and out of the Valley while seeking to establish and maintain a balanced transportation system.
- Encourage the use of public transit modes to reduce dependency on the automobile.
- Provide adequate off-street parking for all new development in Mission Valley.
- Coordinate and combine parking areas and goods delivery to provide a more efficient use of land area.
- Encourage bicycle use in the Valley
- Create the San Diego River Park Pathway that would provide for bicycle and pedestrian access along the San Diego River and would also connect to other regional bicycle and pedestrian trails.
- Improve the visual quality as well as the physical efficiency of the existing and future pedestrian circulation system.

Table 5.2-3
Existing Street Segment Operations

Street Segment	Functional Classification	Capacity (LOS E) [a]	ADT [b]	LOS [c]	V/C [d]
Avenida Del Rio					
Avenida Del Rio to Camino De La Reina *(bridge section)*	4-Lane Collector	30,000	8,330	A	0.278
Camino De La Reina					
Hotel Circle to Project Driveway	2-Lane Collector *(continuous left-turn lane)*	15,000	11,680	D	0.779
Project Driveway to Avenida Del Rio	2-Lane Collector *(continuous left-turn lane)*	15,000	11,680	D	0.779
Avenida Del Rio to Camino De La Siesta	2-Lane Collector *(commercial-industrial fronting)*	15,000	**13,150**	**F**	**0.877**
Hotel Circle N.					
West of I-8 WB Ramps	2-Lane Collector *(continuous left-turn lane)*	15,000	8,650	C	0.577
I-8 WB Ramps to Fashion Valley Road	3-Lane Collector*(no center lane)*	15,000	**16,800**	**F**	**1.120**
Fashion Valley Road to Camino De La Reina	2-Lane Collector *(continuous left-turn lane)*	15,000	13,170	**E**	**0.878**
Hotel Circle S.					
West of I-8 EB Ramps	2-Lane Collector *(continuous left-turn lane)*	15,000	8,170	C	0.545
I-8 EB Ramps to Bachman Place	2-Lane Collector *(continuous left-turn lane)*	15,000	14,390	**E**	**0.959**
Bachman Place to Camino De La Reina	2-Lane Collector *(continuous left-turn lane)*	15,000	14,350	**E**	**0.957**

Notes: a. Capacities based on City of San Diego Roadway Classification Table
b: Average Daily Traffic Volumes;
c: Level of Service;
d: Volume to Capacity;

General Notes:
Bold typeface indicates segments operating at LOS E or F.

Source: LLG, 2015.

Table 5.2-4
Existing Freeway Segment Operations

Freeway and Segment	ADT[b]	AM Peak Hour					PM Peak Hour				
		Direction & Number of Lanes		Capacity[a]	V/C[c]	LOS[d]	Direction & Number of Lanes		Capacity[a]	V/C[c]	LOS[d]
SR-163											
Friars Road to I-8	151,000	NB Mainlines	4M+2CD+1A	13,200	0.589	B	NB Mainlines	4M+2CD+1A	13,200	0.505	B
		SB Mainlines	4M+ 2A	10,400	0.619	B	SB Mainlines	4M+ 2A	10,400	0.603	B
South of I-8	161,000	NB Mainlines	3M+ 1A	7,200	0.842	D	NB Mainlines	3M+ 1A	7,200	**0.967**	**E**
		SB Mainlines	4M	8,000	0.810	D	SB Mainlines	4M	8,000	0.841	D
I-8											
West of Hotel Circle Ramps	190,000	EB Mainlines	4M	8,000	0.618	B	EB Mainlines	4M	8,000	0.775	C
		WB Mainlines	4M+ 1A	9,200	0.824	D	WB Mainlines	4M+ 1A	9,200	0.788	C
Hotel Circle Ramps to SR-163	199,000	EB Mainlines	4M+ 1A	9,200	0.552	B	EB Mainlines	4M+ 1A	9,200	0.772	C
		WB Mainlines[e]	4M+ 1A	9,200	0.910	D	WB Mainlines	4M+ 1A	9,200	0.811	D
SR-163 to Mission Center Road	205,000	EB Mainlines	4M	8,000	0.758	C	EB Mainlines	4M	8,000	**0.989**	**E**
		WB Mainlines	3M+ 2A	8,400	0.761	C	WB Mainlines	3M+ 2A	8,400	0.763	C

Footnotes:

a. Capacity calculated at 2,000 vehicles / hour per mainline lane, 2,000 vehicles / hour per collector distributor lane and 1,200 vehicles / hour per aux lane (M: Mainline, CD: Collector Distributor, A: Auxiliary Lane). *Example:* 4M+2A=4 Mainlines + 2 Auxiliary Lanes)-

b. Existing ADT Volumes from PeMS, September 2012.

c. Volume to Capacity

d. Level of Service

e. The UT project does not add project traffic to I-8 WB mainlines

General Notes:

1. See *Appendix E* for calculation sheets
2. **Bold** typeface indicates segments operating at LOS E or F

Source: LLG, 2015.

Traffic thresholds for Threshold 1 – Area 1 of the Mission Valley Community Plan is 150 trips/acre and 417 trips/acre for Threshold 2 – District C, as pertinent to project location.

5.2.1.6 Analysis Methodology

A description of the methodology used in preparation of the traffic analysis is provided in Section 5.0 of the *Traffic Impact Analysis* (LLG, 2015). The analysis was prepared in accordance with the *City of San Diego Traffic Impact Study Manual (1998), City of San Diego Trip Generation Manual (2003), 2000 Highway Capacity Manual (HCM), Caltrans District 11 Guidelines,* and the *City of San Diego Significance Determination Thresholds (2011)*.

A. Study Area

The traffic study area consists of seven (7) roadway intersections, ten (10) street segments, and five (5) freeway segments.

Intersections:

1. Camino De La Reina/ Avenida Del Rio
2. Camino De La Reina/ Project Driveway
3. Hotel Circle N. / I-8 WB Ramps
4. Hotel Circle N. / Fashion Valley Road
5. Hotel Circle N. / Camino De La Reina
6. Hotel Circle S. / I-8 EB Ramps
7. Hotel Circle S. / Bachman Place

Street segments:

1. Avenida Del Rio: Avenida Del Rio to Camino De La Reina
2. Camino De La Reina: Hotel Circle to Project Driveway
3. Camino De La Reina: Project Driveway to Avenida Del Rio
4. Camino De La Reina: Avenida Del Rio to Camino De La Siesta
5. Hotel Circle N.: West of I-8 WB Ramps
6. Hotel Circle N.: I-8 WB Ramps to Fashion Valley Road
7. Hotel Circle N.: Fashion Valley Road to Camino De La Reina
8. Hotel Circle S.: West of I-8 EB Ramps
9. Hotel Circle S.: I-8 EB Ramps to Bachman Place
10. Hotel Circle S.: Bachman Place to Camino De La Reina

Freeway Segments:

1. SR-163: Friars Road to I-8
2. SR-163: South of I-8
3. I-8: West of Hotel Circle
4. I-8: Hotel Circle to SR-163
5. I-8: SR-163 to Mission Center Road

B. Analysis Approach

The following analysis considered six different scenarios:

- Existing (without Project)
- Existing + Project
- Near-Term (Opening Day 2017) (without Project)
- Near-Term (Opening Day 2017) + Project
- Year 2035 (Horizon Year) (without Project)
- Year 2035 (Horizon Year) + Project

C. Methodology

Level of service (LOS) is the term used to denote the different operating conditions which occur on a given street segment under various traffic volume loads. It is a qualitative measure used to describe a quantitative analysis taking into account factors such as roadway geometries, signal phasing, speed, travel delay, freedom to maneuver, and safety. Level of service provides an index to the operational qualities of a street segment or an intersection. Level of service designations range from A to F, with LOS A representing the best operating conditions and LOS F representing the worst operating conditions. Level of service designation is reported differently for signalized and unsignalized intersections, as well as for street segments.

- ***Signalized intersections*** were analyzed under AM and PM peak hour conditions. Average vehicle delay was determined utilizing the methodology found in Chapter 16 of the *2000 Highway Capacity Manual (HCM),* with the assistance of the *Synchro* version 7 computer software. The delay values (represented in seconds) were qualified with a corresponding intersection Level of Service (LOS).
- ***Unsignalized intersections*** were analyzed under AM and PM peak hour conditions. Average vehicle delay and Levels of Service (LOS) was determined based upon the procedures found in Chapters 17 of the *2000 Highway Capacity Manual (HCM),* with the assistance of the *Synchro* 7 computer software.
- ***Street segment*** analysis is based upon the comparison of daily traffic volumes (ADTs) to the City of San Diego's *Roadway Classification, Level of Service, and ADT Table*. This table provides segment capacities for different street classifications, based on traffic volumes and roadway characteristics.
- ***Freeway segments*** were analyzed during the AM and PM peak hours based on the methodologies developed by Caltrans District 11. Freeway segment LOS is based on the volume to capacity ratio on the freeway.
- ***Metered freeway on-ramps*** were not analyzed because the proposed project does not add any trips to the SR 163/Friars Road interchange on-ramps, which are the only metered on-ramps in the project study area. Therefore, no ramp meter analysis was conducted.

The analysis of freeway segment LOS is based on the procedure developed by Caltrans District 11 guidelines. The procedure involves comparing the peak hour volume of the mainline segment to the theoretical capacity of the roadway (V/C). The procedure for calculating freeway LOS involves the estimation of volume to capacity (V/C) ratio using the following equation:

V/C = (Daily Volume * Peak Hour Percent * Directional Factor * Truck Factor) / Capacity

Daily Volume = Average Daily Traffic (ADT)
Peak Hour Percent = Percentage of ADT occurring during the peak hour.
Directional Factor = Percentage of peak hour traffic occurring in peak direction.
Truck Factor = Truck/terrain factor to represent influence of heavy vehicles & grades.
Capacity = 2,000 vehicles/lane/hour/lane for mainline, and 1,200 for auxiliary lanes.

The resulting V/C is then compared to accepted ranges of V/C values corresponding to the various Levels of Service for each facility classification, as shown in Table 5.2-5. The corresponding Level of Service represents an approximation of existing or anticipated future freeway operating condition in the peak direction of travel during the peak hour.

Table 5.2-5
Caltrans District 11 Freeway Segment Level Of Service Definitions

LOS	V/C	Congestion/Delay	Traffic Description
Used for freeways, expressways and conventional highways			
A	<0.41	None	Free flow
B	0.42-0.62	None	Free to stable flow, light to moderate volumes.
C	0.63-0.80	None to minimal	Stable flow, moderate volumes, freedom to maneuver noticeably restricted
D	0.81-0.92	Minimal to substantial	Approaches unstable flow, heavy volumes, very limited freedom to maneuver.
E	0.93-1.00	Significant	Extremely unstable flow, maneuverability and psychological comfort extremely poor.
Used for freeways and expressways			
F(0)	1.01-1.25	Considerable 0-1 hour delay	Forced flow, heavy congestion, long queues form behind breakdown points, stop and go.
F(I)	1.26-1.35	Severe 1-2 hour delay	Very heavy congestion, very long queues.
F(2)	1.36-1.45	Very Severe 2-3 hour delay	Extremely heavy congestion, longer queues, more numerous breakdown points, longer stop periods.
F(3)	>1.46	Extremely Severe 3+ hours of delay	Gridlock

Source: LLG, 2015

5.2.2 Impact Thresholds

According to the City of San Diego's *Significance Determination Thresholds* dated January 2011, a project is considered to have a significant impact if project traffic would decrease the operations of surrounding roadways by a defined threshold. For projects deemed complete on or after January 1, 2011, the City defined thresholds are shown in Table 5.2-6.

The impact is designated either a "direct" or "cumulative" impact. According to the City's *Significance Determination Thresholds*,

> *"Direct* traffic impacts are those projected to occur at the time a proposed development becomes operational, including other developments not presently operational but which are anticipated to be operational at that time (Near-Term (Opening Day 2017))."
>
> *"Cumulative* traffic impacts are those projected to occur at some point after a proposed development becomes operational, such as during subsequent phases of a project and when additional proposed developments in the area become operational (short-term cumulative) or when affected community plan area reaches full planned buildout (Horizon Year cumulative)."

It is possible that a project's Near-Term (Opening Day 2017) (direct) impacts may be reduced in the long term, as future projects develop and provide additional roadway improvements (for instance, through implementation of traffic phasing plans). In such a case, the project may have direct impacts but not contribute considerably to a cumulative impact."

For intersections and street segments affected by a project, level of service (LOS) D or better is considered acceptable under both direct and cumulative conditions.

Table 5.2-6
City Of San Diego Traffic Impact Significant Thresholds

Level of Service with Project[b]	Allowable Increase Due to Project Impacts[a]					
	Freeways		Street segments		Intersections	Ramp Metering[c]
	V/C	Speed (mph)	V/C	Speed (mph)	Delay (sec.)	Delay (min.)
E	0.010	1.0	0.02	1.0	2.0	2.0
F	0.005	0.5	0.01	0.5	1.0	1.0

Source: LLG, 2015. a: If a proposed project's traffic causes the values shown in the table to be exceeded, the impacts are determined to be significant. The project applicant shall then identify feasible improvements (within the Traffic Impact Study) that would restore/and maintain the traffic facility at an acceptable LOS. If the LOS with the proposed project becomes unacceptable (see note b), or if the project adds a significant amount of peak-hour trips to cause any traffic queues to exceed on- or off-ramp storage capacities, the project applicant shall be responsible for mitigating the project's direct significant and/or cumulatively considerable traffic impacts. b: All LOS measurements are based upon Highway Capacity Manual procedures for peak-hour conditions. However, V/C ratios for street segments are estimated on an ADT/24-hour traffic volume basis (using Table 2 of the City's Traffic Impact Study Manual). The acceptable LOS for freeways, roadways, and intersections is generally "D" ("C" for undeveloped locations). For metered freeway ramps, LOS does not apply. However, ramp meter delays above 15 minutes are considered excessive. c: The allowable increase in delay at a ramp meter with more than 15 minutes delay and freeway LOS E is 2 minutes. The allowable increase in delay at a ramp meter with more than 15 minutes delay and freeway LOS F is 1 minute. Delay = Average control delay per vehicle measured in seconds for intersections or minutes for ramp meters; LOS = Level of Service; V/C = Volume to Capacity ratio; Speed = Arterial speed measured in miles per hour

The project site is located in the City of San Diego. According to the City of San Diego's Significance Determination Thresholds, impacts to transportation/traffic circulation/parking would be considered significant if:

- *Any intersection, street segment, or freeway segment affected by a project would operate at LOS E or F under either direct or cumulative conditions, the impact would be significant if the project exceeds the thresholds shown in Table 5.2-6;*
- *At any ramp meter location with delays above 15 minutes, the impact would be significant if the project exceeds the thresholds shown in Table 5.2-6;*
- *A project would add a substantial amount of traffic to a congested freeway segment, interchange, or ramp as shown in Table 5.2-6;*
- *A project would increase traffic hazards to motor vehicles, bicyclists, or pedestrians due to proposed non-standard design features (e.g. poor sight distance, proposed driveway onto an access-restricted roadway);*
- *A project would result in the construction of a roadway which is inconsistent with the General Plan and/or a community plan, the impact would be significant if the proposed roadway would not properly align with the other existing or planned roadways; and/or,*
- *A project would result in a substantial restriction in access to publicly or privately owned land, the impact would be significant.*

A project is considered to have a significant impact if project traffic would decrease the operations of surrounding roadways by a defined threshold. If a project exceeds the thresholds in Table 5.2-6, then the project is considered to have a "direct" or "cumulative" project impact. A significant impact can also occur if a project causes the LOS to

degrade from D to E, even if the allowable increases in Table 5.2-6 are not exceeded. A feasible mitigation measure would need to be identified to return the impact within the City thresholds, or the impact would be considered significant and unavoidable.

5.2.3 Issue 1

Issue 1: Would the proposed project result in an increase in project traffic, which is substantial in relation to the existing traffic load and capacity of the street system?

Analysis of the project's projected impacts to the local street system, including intersections and street segments for the Existing + Project and Near-Term (Opening Day 2017) Conditions scenarios, is discussed in the following sections.

5.2.3.1 Impact Analysis

According to the City of San Diego's Significance Determination Thresholds, impacts to transportation/traffic circulation would be considered significant if:

- *Any intersection, street segment, or freeway segment affected by a project would operate at LOS E or F, or the project would degrade the facility from LOS D to LOS E, under either direct or cumulative conditions, the impact would be significant if the project exceeds the thresholds shown in Table 5.2-6; or,*
- *At any ramp meter location with delays above 15 minutes, the impact would be significant if the project exceeds the thresholds shown in Table 5.2-6.*

A. Project Trip Generation, Distribution and Assignment

The proposed project proposes a mixed-use, transit-oriented development (TOD) consisting of residential and retail amenity space land uses, in addition to the existing uses on the site. The smart growth land uses proposed are expected to promote interaction within the land uses on-site and encourage use of public transit.

Such developments generally generate fewer vehicle trips and less demand for parking as compared to conventional suburban developments due to the synergy of land uses and increased opportunity for transit, walking, and bicycle trips. As part of the proposed project an uninterrupted River Park pathway from the project site to the existing pedestrian bridge at the adjacent Town & Country site would be constructed, which would provide direct access to the existing light rail trolley station at Fashion Valley. Figures 3-1 and 3-2 of this EIR provide a depiction of this pathway.

In addition, the proposed project includes the following multimodal elements that promote alternative transportation:

- MTS bus stops located within approximately 500 feet from the project site and throughout the project study area will be retained;
- The existing pathway connecting the existing pedestrian bridge with the Fashion Valley Transit Center, which is serviced by the Trolley Green Line every 15 minutes, will be retained;

- Installation of an uninterrupted River Park pathway from the project site to the existing pedestrian bridge at the adjacent Town & Country site would be constructed, which would provide direct access to the existing light rail trolley station at Fashion Valley.
- Installation of bike path along the northern and western portion of the project to connect Camino De La Reina with the pedestrian bridge over the San Diego River;
- Installation of shared pedestrian path around the northern and western portion of the project;
- Installation of pedestrian walkways throughout the proposed project;
- Installation of bicycle parking; and,
- Implementation of a Transportation Demand Management (TDM) program (as further described in Section 5.2.3.3), which would encourage the use of these alternative modes of transportation.

The Standard City Method is used to determine the proposed project's trip generation, as shown in Table 5.2-7 below.

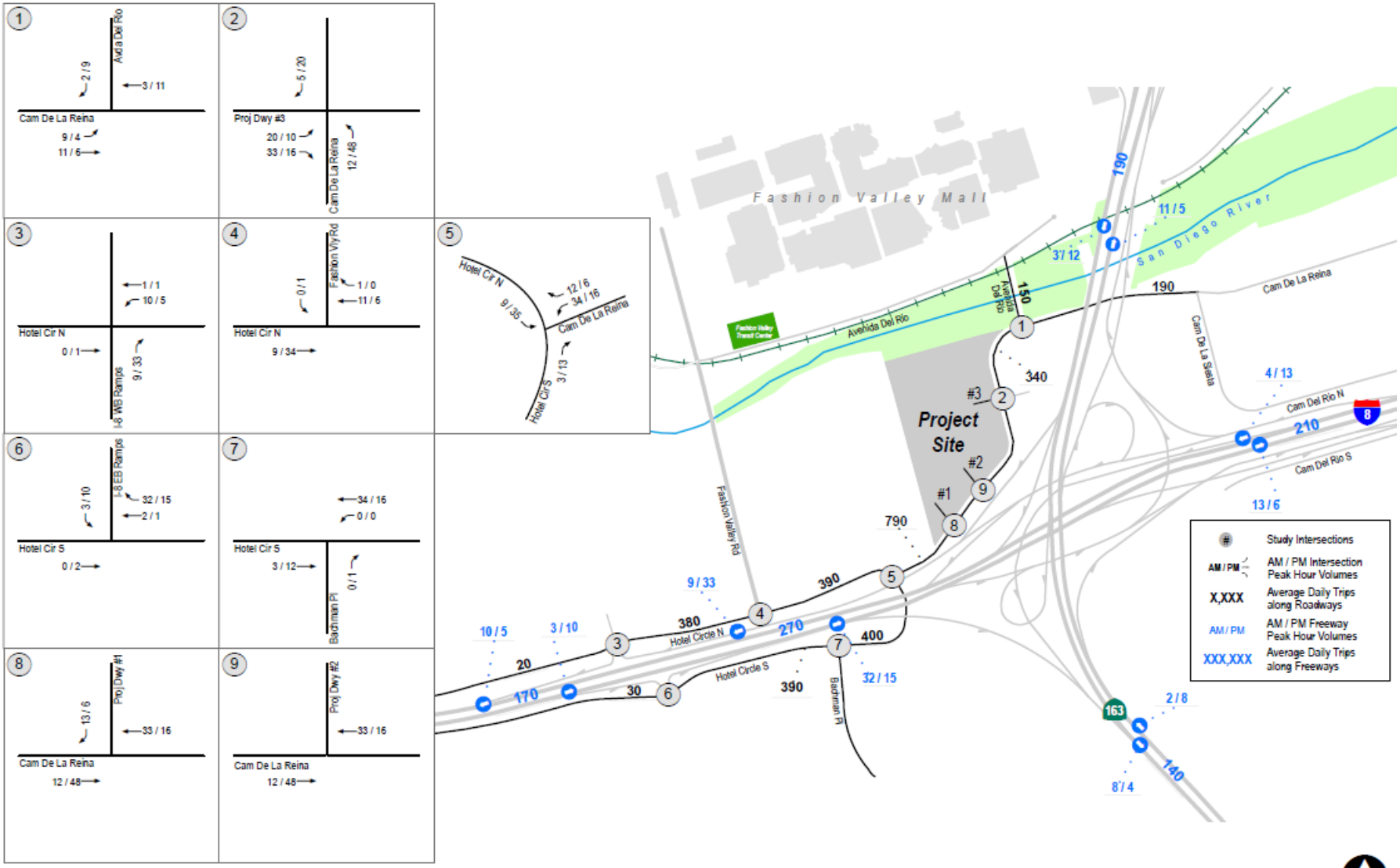
Table 5.2-7
Union Tribune Master Plan Trip Generation

Land Use & Size	Trip Rate & Credits	Weekday ADT[a]	AM Peak Hour		PM Peak Hour	
			In	Out	In	Out
Multi-Family Residential 200 Units (Over 20 DU/ac)	Trip Rate (6/DU)[b]	1,200	19	77	76	32
	Transit Credit (5%)[c]	-60	-2	-7	-5	-2
	Community Mixed-use Credit (10%)[d]	-120	-2	-6	-8	-3
	Cumulative (100%)	1,020	15	64	63	27
	Pass-By (0%)	0	0	0	0	0
	Driveway	1,020	15	64	63	27
Retail Amenity Space 3,000 SF	Trip Rate (40/KSF)[e]	120	2	2	5	6
	Transit Credit (0%)	0	0	0	0	0
	Community Mixed-use Credit (0%)	0	0	0	0	0
	Cumulative (100%)	108	2	2	5	5
	Pass-By (0%)	12	0	0	0	1
	Driveway	120	2	2	5	6
Net Project Total:	Cumulative	1,128	17	66	68	32
	Pass-By	0	0	0	0	1
	Driveway	1,140	17	66	68	33

Footnotes: a. Traffic volumes expressed in vehicles per day.
b. Trip rate for multi-family units over 20 DU/acre used with AM splits as 8 % ADT with 20:80 (In:Out). PM splits are 9% ADT with 70:30 (In:Out).
c. Transit credits for residential land uses (5% ADT, 9% AM and 6% PM peak hours) were taken due to the proximity of the Fashion Valley Transit Center.
d. Mixed-use credits for residential land uses (10% ADT, 8% AM and 10% PM peak hours) were taken due the proximity to the Fashion Valley Mall.
e. The proposed 3,000 SF retail amenity space is ancillary to the primary trip generating land uses on site (i.e. multi-family residential, UT office and printing facility). The proposed retail amenity space use of 3,000 SF is less than 1% of the total project density (UT project is 208,126 SF, existing UT office is 168,575 SF and existing print facility is 191,550 SF). However, "specialty" retail trip rate of 40/KSF is used with AM splits as 3% ADT with 60:40 (In:Out). PM splits are 9% with 50:50 (In:Out).

General Notes:
1. All trip rate percentages are based on the City of San Diego Trip Generation Manual, May 2003.
2. Driveway Trips—vehicles entering and exiting project driveways (Driveway = Cumulative + Pass-By)
3. Cumulative Trips—net new vehicles added to the network
4. Pass-By Trips—vehicles already on the street network diverting to the project site.
5. The project does not propose any change to the existing Union Tribune office (168,570 SF) and printing facility (191,550 SF).

Source: LLG, 2015



SOURCE: Linscott, Law & Greenspan, 2014

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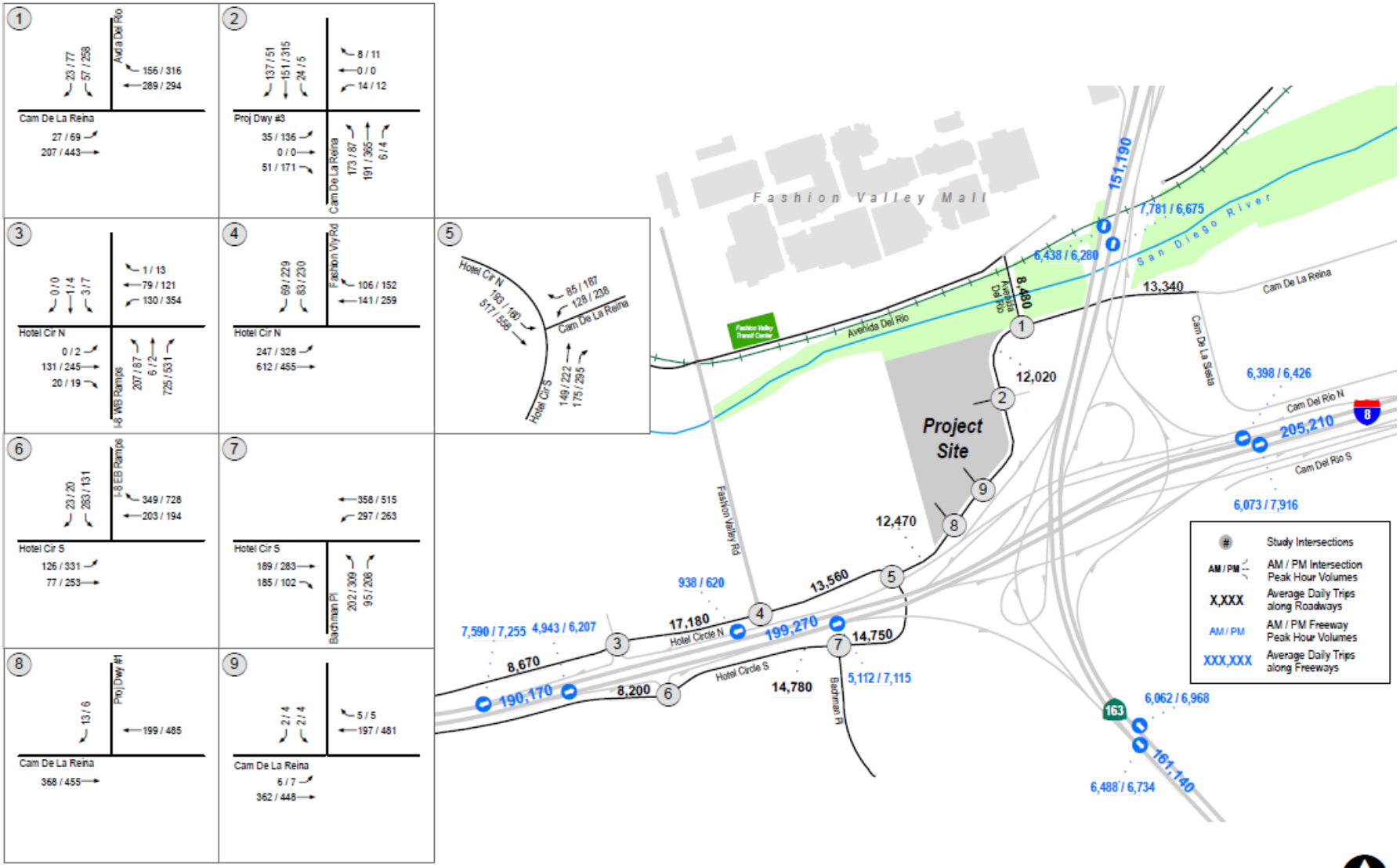
Project Traffic Volumes

FIGURE 5.2-3



SOURCE: Linscott, Law & Greenspan, 2014

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Existing + Project Traffic Volumes

FIGURE 5.2-4

B. Existing + Project Conditions

The Existing + Project analysis presumes the full build out of the project under the existing environmental conditions, as shown in Figure 5.2-3 and 5.2-4.

EXISTING + PROJECT INTERSECTION OPERATIONS

As shown in the Table 5.2-8, all intersections would operate at an acceptable LOS (i.e. LOS D or better) during both the AM and PM peak hours under the Existing + Project scenario, except for the following intersection:

- Hotel Circle S./I-8 EB Ramps (LOS F during the PM peak hour)

For all but the Hotel Circle S./I-8 EB Ramps intersection, the project's impact would be considered less than significant, based on increase in delay. Based on the City of San Diego's significance criteria, a significant direct impact is identified at the Hotel Circle S./I-8 EB Ramps intersection (LOS F during the PM peak hour).

EXISTING + PROJECT STREET SEGMENT OPERATIONS

As shown in Table 5.2-9, all streets in the study area would operate at an acceptable LOS except for the following segments under the Existing + Project Conditions:

- Camino De La Reina: Avenida Del Rio to Camino De La Siesta (LOS E)
- Hotel Circle N.: I-8 WB Ramps to Fashion Valley Road (LOS F)
- Hotel Circle N.: Fashion Valley Road to Camino De La Reina (LOS E)
- Hotel Circle S.: I-8 EB Ramps to Bachman Place (LOS E)
- Hotel Circle S.: Bachman Place to Camino De La Reina (LOS E)

Based on City of San Diego significance criteria, no significantly impacted street segments were calculated on Camino De La Reina: Avenida Del Rio to Camino De La Siesta since the project contribution does not exceed the allowable thresholds. However, significant direct impacts were identified for the following segments:

- Hotel Circle N.: I-8 WB Ramps to Fashion Valley Road (LOS F)
- Hotel Circle N.: Fashion Valley Road to Camino De La Reina (LOS E)
- Hotel Circle S.: I-8 EB Ramps to Bachman Place (LOS F)
- Hotel Circle S.: Bachman Place to Camino De La Reina (LOS F)

C. Near-Term (Opening Day 2017) Conditions

The Near-Term (Opening Day 2017) Conditions analysis presumes the full build out of the project in the year 2017, as shown in Figures 5.2-5, 5.2-6, and 5.2-7. The implementation of a number of local and regional roadway improvements were considered based on coordination with City staff and information provided in the Mission Valley Public Facilities Financing Plan (PFFP). However, based on the funding status, feasibility, and the likelihood of improvements being constructed by the opening day in the project area, no planned and regional improvements were assumed. Near-Term (Opening Day 2017) traffic volumes were calculated for the study area by adding the Near-Term cumulative project volumes onto the existing volumes. The Near-Term cumulative projects are provided in Table 6-1 and further discussed in Section 6.0 of this EIR.

Direct site access will be provided along Camino De La Reina via three (3) unsignalized driveways. Parking to the proposed residential use will be accessible via Driveways #1 and #3. The driveway that currently serves the existing office building will serve as the main project driveway (Driveway #3) and provide access to the proposed residential parking. This driveway will include full movements and be realigned with the east leg of the intersection, which provides access to Mueller College (123 Camino De La Reina). In addition, dedicated northbound and southbound left-turn lanes at the Camino De La Reina/Project Driveway #3 intersection will also be provided. Driveway #1 will also include access to residential parking along the southern property edge. Driveway #1 will be restricted to allow right-in/ right-out movements only. To enforce the right-in/right-out movements, the project proposes to construct a 10-foot wide and approximately 200-foot long raised median on Camino Del La Reina fronting Driveway #1. No changes are proposed to project Driveway #2, which would remain full access to service newspaper delivery trucks. A traffic signal warrant analysis was conducted for Driveway #3 and the results indicate that a traffic signal will not be warranted. This is primarily due to the low left-turn volumes exiting the project driveway.

Table 5.2-8
Existing + Project Intersection Operations

Intersection	Control Type	Peak Hour	Existing		Existing + Project		Δ[c]	Sig Impact?
			Delay[a]	LOS[b]	Delay	LOS		
1. Camino De La Reina/ Avenida Del Rio	Signal	AM	7.0	A	8.8	A	1.8	No
		PM	9.4	A	9.6	A	0.2	No
2. Camino De La Reina/ Project Driveway #3	Unsignalized	AM	14.8	B	16.0	C	1.2	No
		PM	16.3	C	19.7	C	3.4	No
3. Hotel Circle N. / I-8 WB Ramps	All Way Stop	AM	11.4	B	11.6	B	0.2	No
		PM	11.0	B	11.2	B	0.2	No
4. Hotel Circle N. / Fashion Valley Road	Signal	AM	19.9	B	20.2	C	0.3	No
		PM	54.3	D	54.6	D	0.3	No
5. Hotel Circle N. / Camino De La Reina	Signal	AM	11.2	B	12.0	B	0.8	No
		PM	15.6	B	17.3	B	1.7	No
6. Hotel Circle S. / I-8 EB Ramps	All Way Stop	AM	13.5	B	14.2	B	0.7	No
		PM	**54.2**	**F**	**61.1**	**F**	**6.9**	**Yes**
7. Hotel Circle S. / Bachman Place	Signal	AM	26.8	C	27.7	C	0.9	No
		PM	21.6	C	22.0	C	0.4	No
8. Camino De La Reina / Project Driveway #1	Unsignalized	AM	N/A[d]	-	9.4	A	9.4	No
		PM	N/A[d]	-	11.6	B	11.6	No
9. Camino De La Reina / Project Driveway #2	Unsignalized	AM	10.7	A	10.9	B	0.2	No
		PM	12.3	B	12.7	B	0.4	No

Footnotes:

a. Average delay expressed in seconds per vehicle. b. Level of Service. c. "**Δ**" denotes the project-induced increase in delay. d. Project driveway #1 is currently non-accessible (chain-link) and is proposed to allow right-in/right-out movements only in the "with project" scenario.

General Notes:

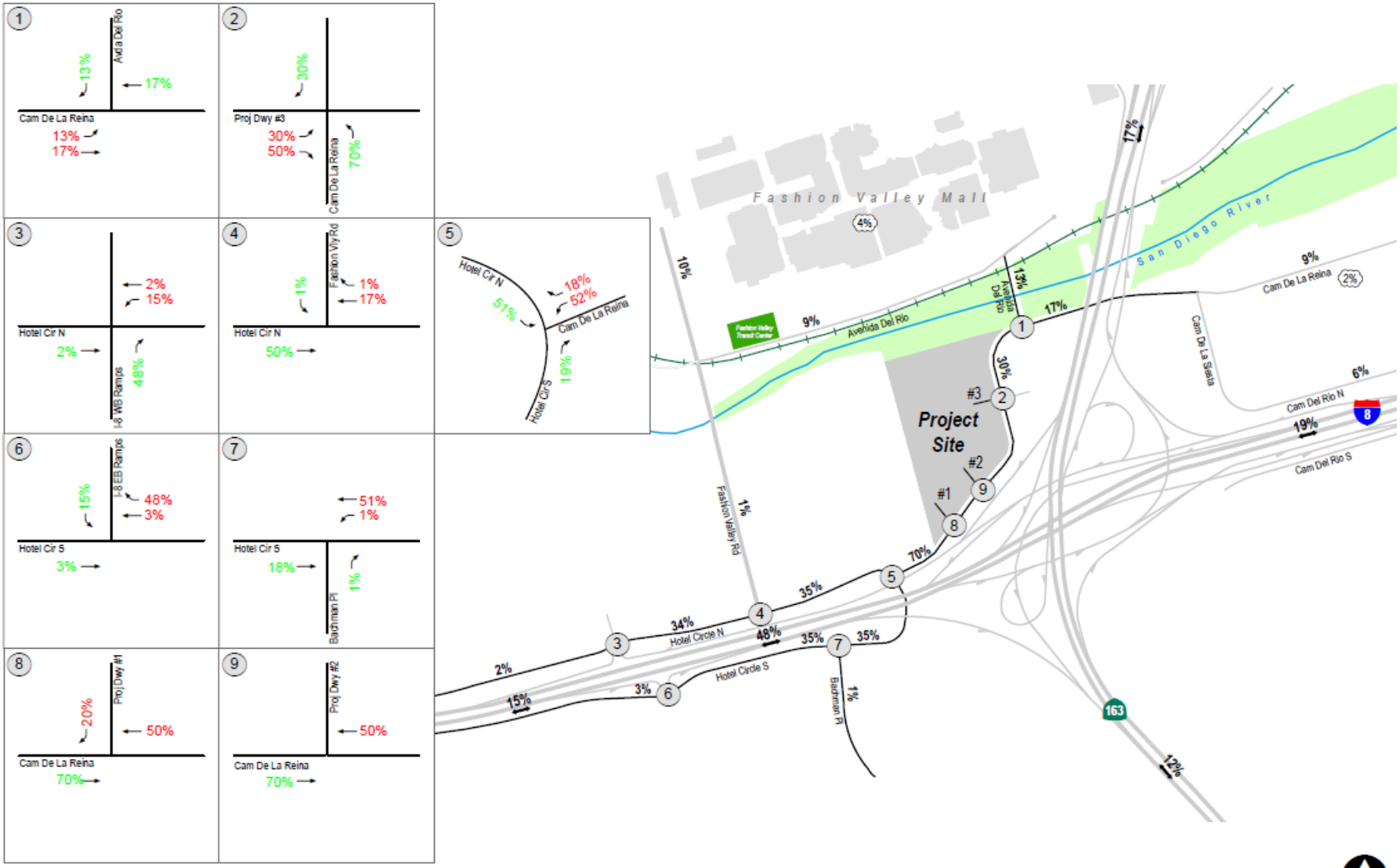
1. **Bold** typeface indicates intersections operating at LOS E or F. 2. N/A – not applicable

Source: LLG, 2015.

Table 5.2-9
Existing + Project Street Segment Operations

Street Segment	Functional Classification	Capacity (LOS E) [a]	Existing			Existing + Project			V/C Increase	Sig[e]
			ADT[b]	LOS[c]	V/C[d]	ADT[b]	LOS[c]	V/C[d]		
Avenida Del Rio										
Avenida Del Rio to Camino De La Reina *(bridge section)*	4-Lane Collector	30,000	8,330	A	0.278	8,480	A	0.283	0.005	No
Camino De La Reina										
Hotel Circle to Project Driveway	2-Lane Collector *(continuous left-turn lane)*	15,000	11,680	D	0.779	12,470	D	0.831	0.052	No
Project Driveway to Avenida Del Rio	2-Lane Collector *(continuous left-turn lane)*	15,000	11,680	D	0.779	12,020	D	0.801	0.022	**No**
Avenida Del Rio to Camino De La Siesta	2-Lane Collector *(commercial-industrial fronting)*	15,000	**13,150**	**E**	**0.877**	**13,340**	**E**	**0.889**	0.012	**No**
Hotel Circle N.										
West of I-8 WB Ramps	2-Lane Collector *(continuous left-turn lane)*	15,000	8,650	C	0.577	8,670	C	0.578	0.001	No
I-8 WB Ramps to Fashion Valley Road	3-Lane Collector *(no center lane)*	15,000	**16,800**	**F**	**1.120**	**17,180**	**F**	**1.145**	**0.025**	**Yes**
Fashion Valley Road to Camino De La Reina	2-Lane Collector *(continuous left-turn lane)*	15,000	**13,170**	**E**	**0.878**	**13,560**	**E**	**0.904**	**0.026**	**Yes**
Hotel Circle S.										
West of I-8 EB Ramps	2-Lane Collector *(continuous left-turn lane)*	15,000	8,170	C	0.545	8,200	C	0.547	0.002	No
I-8 EB Ramps to Bachman Place	2-Lane Collector *(continuous left-turn lane)*	15,000	**14,390**	**E**	**0.959**	**14,780**	**E**	**0.985**	**0.026**	**Yes**
Bachman Place to Camino De La Reina	2-Lane Collector *(continuous left-turn lane)*	15,000	**14,350**	**E**	**0.957**	**14,750**	**E**	**0.983**	**0.026**	**Yes**

Footnotes:
a. Capacities based on City of San Diego Roadway Classification Table.
b. Average Daily Traffic Volumes.
c. Level of Service.
d. Volume to Capacity.
General Notes:
1. **Bold** typeface indicates segments operating at LOS E or F
Source: LLG, 2015



SOURCE: Linscott, Law & Greenspan, 2014

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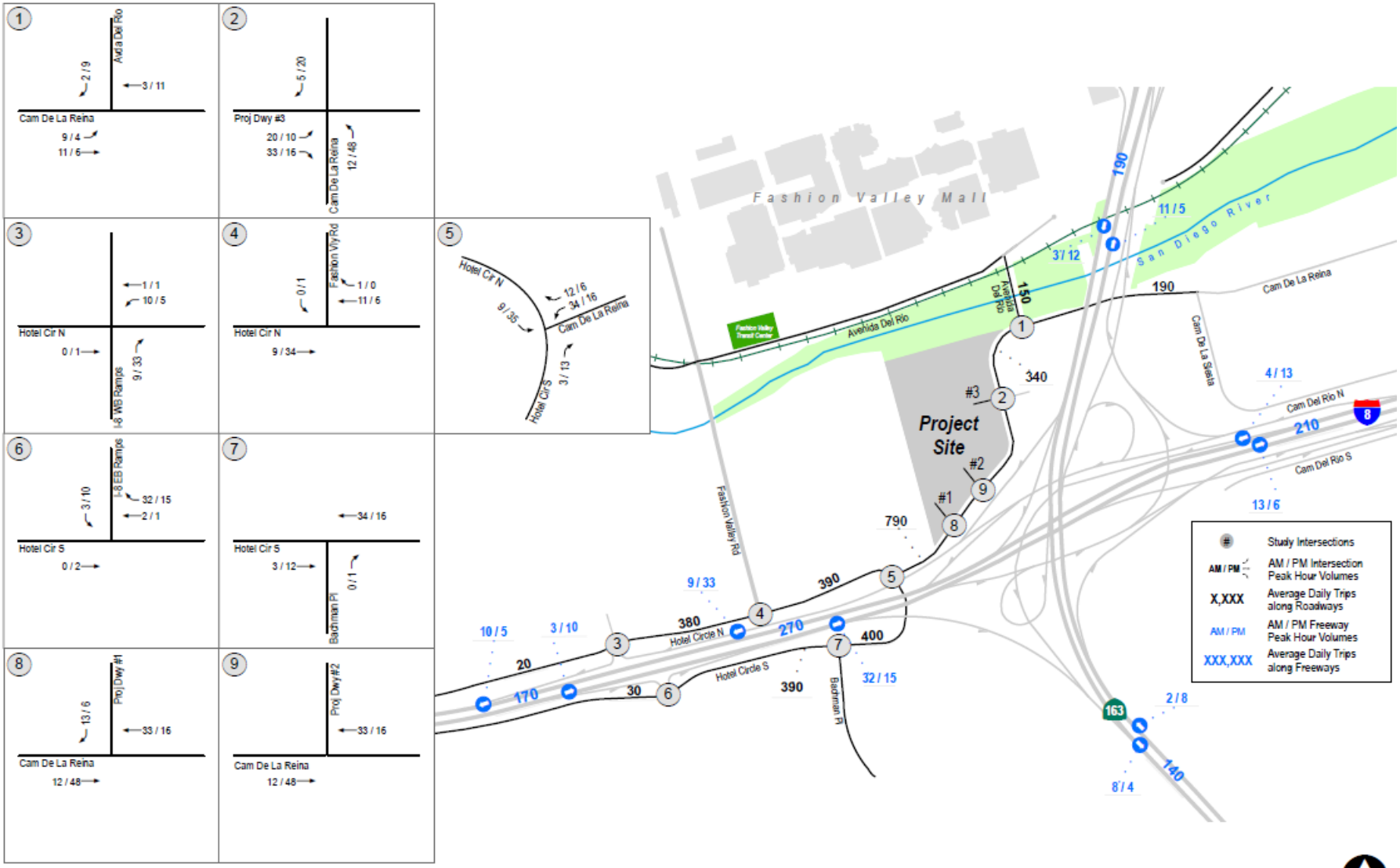
Near-Term (Opening Day 2017) Project Traffic Distribution

FIGURE 5.2-5



SOURCE: Linscott, Law & Greenspan, 2014

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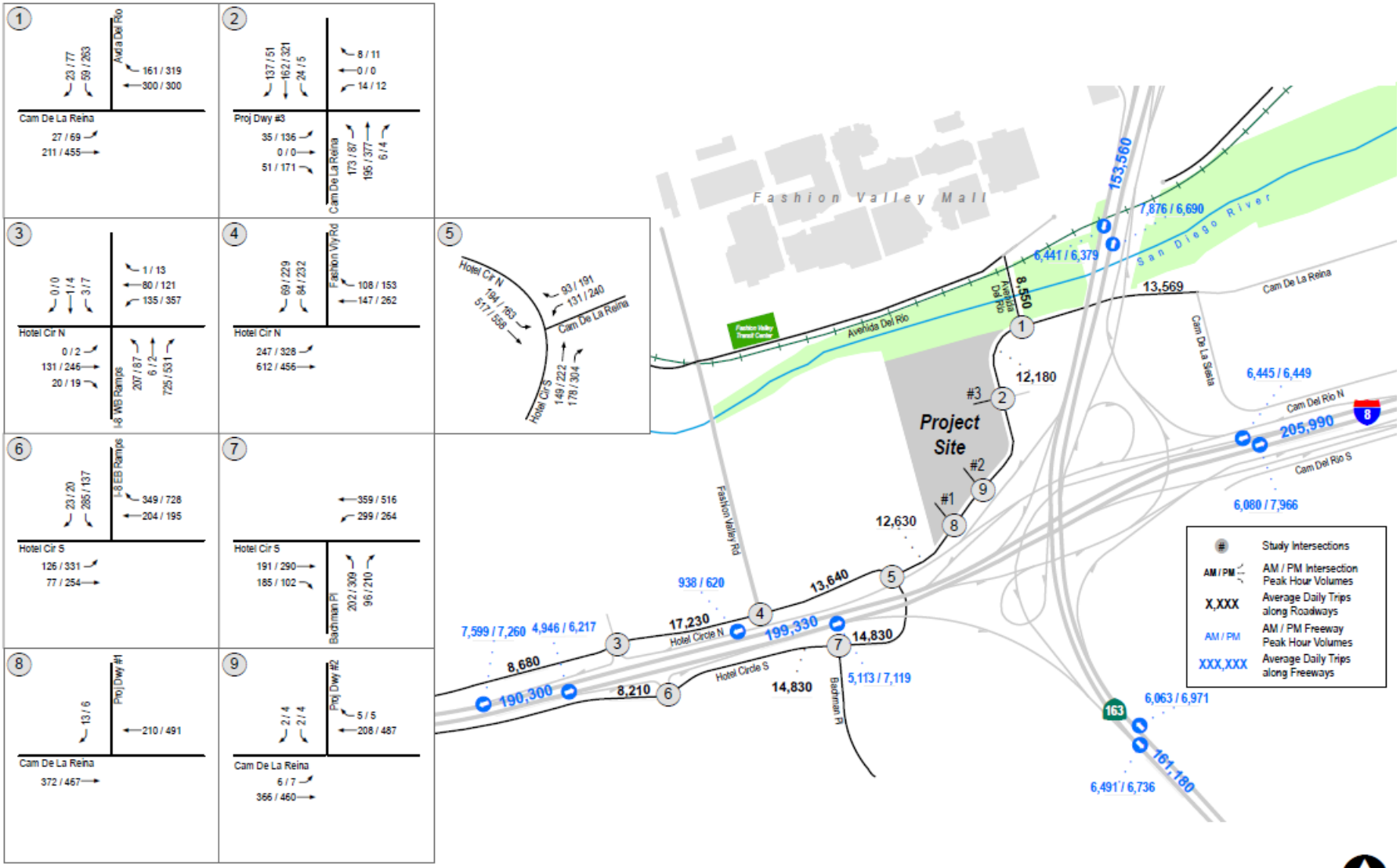
Near-Term (Opening Day 2017) Project Traffic Volumes

FIGURE 5.2-6



SOURCE: Linscott, Law & Greenspan, 2014

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Near-Term (Opening Day 2017) With Project Traffic Volumes

FIGURE 5.2-7

NEAR-TERM (OPENING DAY 2017) INTERSECTION OPERATIONS

As shown in Table 5.2-10, all intersections would operate at an acceptable LOS (i.e. LOS D or better) during both the AM and PM peak hours under the Near-Term (Opening Day 2017) Conditions scenario, except for the following intersection:

- Hotel Circle S./I-8 EB Ramps (LOS F during the PM peak hour)

Based on the City of San Diego significance criteria, a significant direct impact was identified at the following intersection:

- Hotel Circle S./I-8 EB Ramps (LOS F during the PM peak hour)

Table 5.2-10
Near-Term (Opening Day 2017) Intersection Operations

Intersection	Control Type	Peak Hour	Near-Term		Near-Term + Project (Opening Day 2017)		Δ[c]	Significant Impact?
			Delay[a]	LOS[b]	Delay	LOS		
1. Camino De La Reina/ Avenida Del Rio	Signal	AM	7.0	A	8.8	A	1.8	No
		PM	9.5	A	9.7	A	0.2	No
2. Camino De La Reina / Project Driveway #3	Unsignalized	AM	14.9	B	16.1	C	1.2	No
		PM	16.6	C	20.1	C	3.5	No
3. Hotel Circle N./ I-8 WB Ramps	All Way Stop	AM	11.4	B	11.6	B	0.2	No
		PM	11.0	B	11.2	B	0.2	No
4. Hotel Circle N./ Fashion Valley Road	Signal	AM	19.9	B	20.2	C	0.3	No
		PM	54.7	D	54.9	D	0.2	No
5. Hotel Circle N./ Camino De La Reina	Signal	AM	11.3	B	12.2	B	0.9	No
		PM	15.9	B	17.8	B	1.9	No
6. Hotel Circle S. / I-8 EB Ramps	All Way Stop	AM	13.6	B	14.2	B	0.6	No
		PM	**55.5**	**F**	**62.5**	**F**	**7.0**	**Yes**
7. Hotel Circle S. / Bachman Place	Signal	AM	27.2	C	27.9	C	0.7	No
		PM	21.9	C	22.3	C	0.4	No
8. Camino De La Reina / Project Driveway #1	Unsignalized	AM	N/A[d]	-	9.5	A	9.5	No
		PM	N/A[d]	-	11.7	B	11.7	No
9. Camino De La Reina / Project Driveway #2	Unsignalized	AM	10.8	B	10.9	B	0.1	No
		PM	12.4	B	12.8	B	0.4	No

Footnotes:
a. Average delay expressed in seconds per vehicle.
b. Level of Service.
c. "**Δ**" denotes the project-induced increase in delay.
d. Project driveway #1 is currently non-accessible (chain-link) and is proposed to allow right-in/right-out movements only in the "with project" scenario.

General Notes:
1. **Bold** typeface indicates intersections operating at LOS E or F.
2. N/A – not applicable
Source: LLG, 2015.

NEAR-TERM (OPENING DAY 2017) STREET SEGMENT OPERATIONS

As shown in Table 5.2-11, all streets in the study area would operate at an acceptable LOS except for the following segments under the Near-Term (Opening Day 2017) Conditions scenario:

- Camino De La Reina: Avenida Del Rio to Camino De La Siesta (LOS E)
- Hotel Circle N.: I-8 WB Ramps to Fashion Valley Road (LOS F)
- Hotel Circle N.: Fashion Valley Road to Camino De La Reina (LOS E)
- Hotel Circle S.: I-8 EB Ramps to Bachman Place (LOS E)
- Hotel Circle S.: Bachman Place to Camino De La Reina (LOS E)

Table 5.2-11
Near-Term (Opening Day 2017) Street Segment Operations

Street Segment	Functional Classification	Capacity (LOS E) [a]	Near-Term			Near-Term + Project (Opening Day 2017)			V/C Increase	Sig
			ADT[b]	LOS[c]	V/C[d]	ADT[b]	LOS[c]	V/C[d]		
Avenida Del Rio										
Avenida Del Rio to Camino De La Reina *(bridge section)*	4-Lane Collector	30,000	8,400	A	0.280	8,550	A	0.285	0.005	No
Camino De La Reina										
Hotel Circle to Project Driveway	2-Lane Collector *(continuous left-turn lane)*	15,000	11,840	D	0.789	12,630	D	0.842	0.053	No
Project Driveway to Avenida Del Rio	2-Lane Collector *(continuous left-turn lane)*	15,000	11,840	D	0.789	12,180	D	0.812	0.023	No
Avenida Del Rio to Camino De La Siesta	2-Lane Collector *(commercial-industrial fronting)*	15,000	**13,379**	**E**	**0.892**	**13,569**	**E**	**0.905**	0.013	No
Hotel Circle N.										
West of I-8 WB Ramps	2-Lane Collector *(continuous left-turn lane)*	15,000	8,660	C	0.577	8,680	C	0.579	0.002	No
I-8 WB Ramps to Fashion Valley Road	3-Lane Collector *(no center lane)*	15,000	**16,850**	**F**	**1.123**	**17,230**	**F**	**1.149**	**0.026**	**Yes**
Fashion Valley Road to Camino De La Reina	2-Lane Collector *(continuous left-turn lane)*	15,000	**13,250**	**E**	**0.883**	**13,640**	**E**	**0.909**	**0.026**	**Yes**
Hotel Circle S.										
West of I-8 EB Ramps	2-Lane Collector *(continuous left-turn lane)*	15,000	8,180	C	0.545	8,210	C	0.547	0.002	No
I-8 EB Ramps to Bachman Place	2-Lane Collector *(continuous left-turn lane)*	15,000	**14,440**	**E**	**0.963**	**14,830**	**E**	**0.989**	**0.026**	**Yes**
Bachman Place to Camino De La Reina	2-Lane Collector *(continuous left-turn lane)*	15,000	**14,430**	**E**	**0.962**	**14,830**	**E**	**0.989**	**0.027**	**Yes**

Footnotes:

a. Capacities based on City of San Diego Roadway Classification Table.
b. Average Daily Traffic Volumes.
c. Level of Service.
d. Volume to Capacity.

General Notes:

1. **Bold** typeface indicates segments operating at LOS E or F

Source: LLG, 2015

As shown in Table 5.2-11, based on City of San Diego significance criteria, no impact was calculated on the following segment because the project contribution does not exceed the allowable threshold:

- Camino De La Reina: Avenida Del Rio to Camino De La Siesta (LOS E)

However, as shown in Table 5.2-11, based on City of San Diego significance criteria, significant direct impacts are identified on the following segments as the project traffic contribution exceeds the allowable thresholds:

- Hotel Circle N.: I-8 WB Ramps to Fashion Valley Road (LOS F)
- Hotel Circle N.: Fashion Valley Road to Camino De La Reina (LOS E)
- Hotel Circle S.: I-8 EB Ramps to Bachman Place (LOS E)
- Hotel Circle S.: Bachman Place to Camino De La Reina (LOS E)

5.2.3.2 Significance of Impact

The following describes the significant impacts with the implementation of the proposed project. An impact would be considered significant if the proposed project exceeds the thresholds shown in Table 5.2-6.

A. Existing + Project Impact Significance

Per the City's significance thresholds and the analysis methodology presented in this report, project related traffic is calculated to cause significant impacts within the study area under Existing + Project conditions, as shown in Table 5.2-12. The following section identifies the significance of impacts under Existing + Project conditions.

Table 5.2-12
Existing + Project Significant Impacts

Facility Type	Location
Intersections	• Hotel Circle S. / I-8 EB Ramps
Street Segments	• Hotel Circle N.: I-8 WB Ramps to Fashion Valley Road • Hotel Circle N.: Fashion Valley Road to Camino De La Reina • Hotel Circle S.: I-8 EB Ramps to Bachman Place • Hotel Circle S.: Bachman Place to Camino De La Reina

Source: LLG, 2015

B. Near-Term (Opening Day 2017) Conditions Impact Significance

Per the City's significance thresholds and the analysis methodology presented in this report, project related traffic is calculated to cause significant impacts within the study area in the Near-Term (Opening Day 2017) conditions as shown in Table 5.2-13.

Table 5.2-13
Near-Term (Opening Day 2017) Significant Impacts

Facility Type	Location
Intersections	• Hotel Circle S. / I-8 EB Ramps
Street Segments	• Hotel Circle N.: I-8 WB Ramps to Fashion Valley Road • Hotel Circle N.: Fashion Valley Road to Camino De La Reina • Hotel Circle S.: I-8 EB Ramps to Bachman Place • Hotel Circle S.: Bachman Place to Camino De La Reina

Source: LLG, 2015

5.2.3.3 Mitigation, Monitoring, and Reporting

A. Existing + Project Conditions

In the Existing + Project scenario, project related traffic is calculated to cause significant direct impacts within the study area. The improvements are summarized in Tables 5.2-14 and 5.2-15. The following intersection and street segment improvements identified to mitigate the Existing + Project significant "direct" impact were considered, but determined infeasible. As shown in the Tables 5.2-14 and 5.2-15 below, the identified mitigation would reduce the project impacts to a level of 'not significant'. For the purposes of this report, a level of 'not significant' reflects allowable delay increases within City defined thresholds. A Project mitigation diagram, demonstrating the identified mitigation for the impacted intersection and street segments is shown in Figure 5.2-8.

INTERSECTION MITIGATION MEASURES

Hotel Circle S. / I-8 EB Ramps

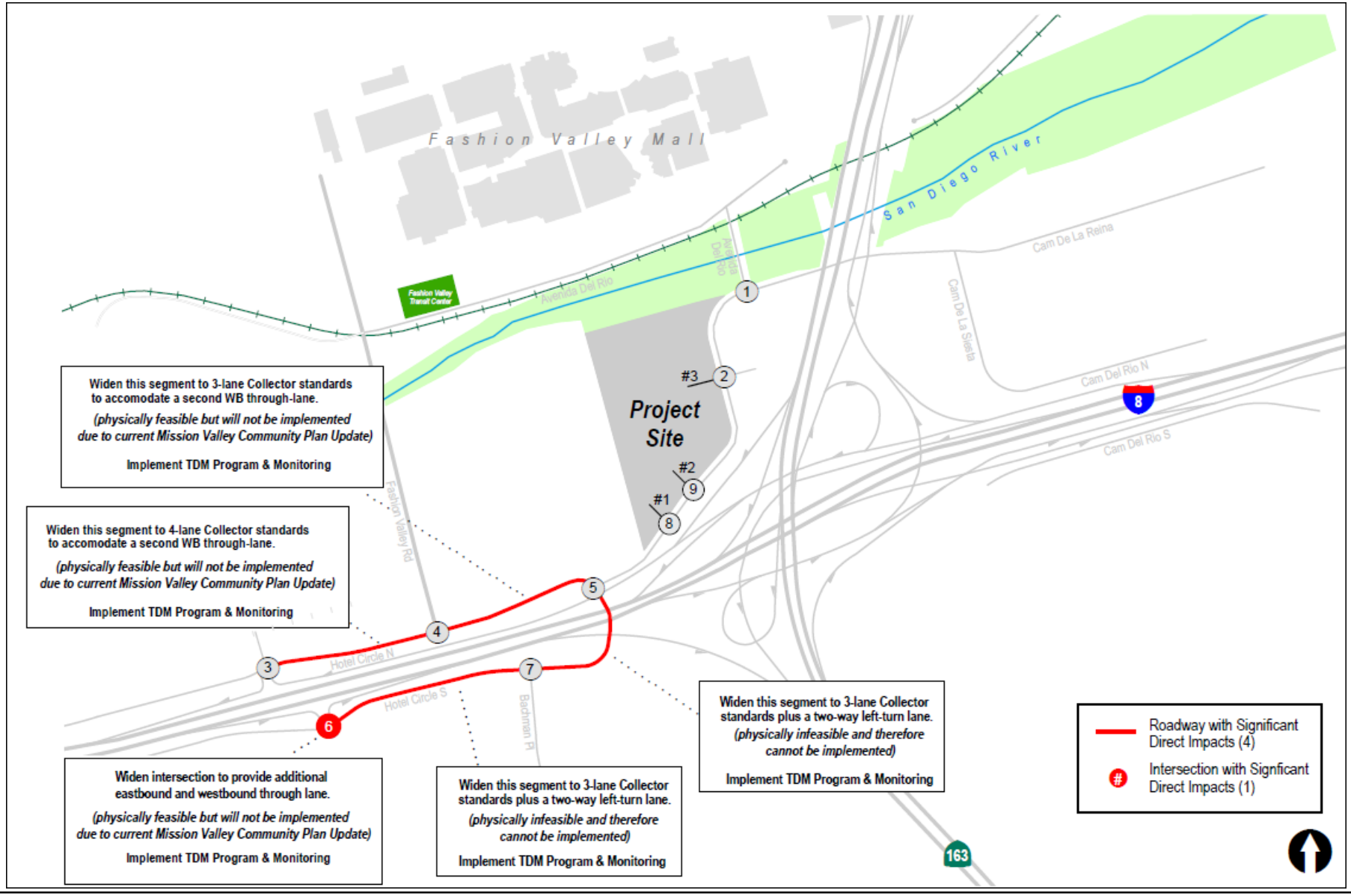
In an attempt to mitigate the project's direct impact, LLG analyzed three (3) intersection control alternatives, which include a traffic signal, roundabout and an enhanced all-way stop control per recent statewide directive (Caltrans Intersection Control Evaluation (ICE) and Design Guidance).

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.

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 below, 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.

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.

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.



SOURCE: Linscott, Law & Greenspan, 2015

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Existing + Project Impacts & Mitigation Measures

FIGURE 5.2-8

STREET SEGMENT MITIGATION MEASURES

Hotel Circle N.: I-8 WB Ramps to Fashion Valley Road

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 implement this improvement and impacts along this street segment would remain significant and unavoidable.

Hotel Circle N.: Fashion Valley Road to Camino De La Reina

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 & 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.

Hotel Circle S.: I-8 EB Ramps to Bachman Place

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 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.

Hotel Circle S.: Bachman Place to Camino De La Reina

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.

Mitigation Conclusions

With implementation of the proposed project in the Existing + Project Scenario, one (1) intersection and four (4) street segments have the potential to result in significant and unavoidable impacts. In an effort to reduce the potential significant impacts, the Applicant shall implement Mitigation Measure T-1, which requires implementation of a TDM program.

LLG in conjunction with Transportation Management Services (TMS) has prepared the following site-specific TDM program for the proposed project. The TDM program includes several strategies and techniques that aid in reducing vehicular trips and associated air quality impacts and greenhouse gas emissions. The TDM program is based on

Table 5.2-14
Existing + Project Intersection Mitigation Analysis

Intersection	Control Type	Peak Hour	Existing		Existing + Project		Existing + Project and Mitigation			Mitigation
			Delay[a]	LOS[b]	Delay	LOS	Delay	LOS	Δ[c]	
Hotel Circle S. / I-8 EB Ramps	Signal	AM	13.5	B	14.2	C	**13.2**	B	(0.3)	Signalize (*infeasible; therefore this mitigation cannot be implemented)* Construct a 1-lane roundabout (*infeasible; therefore this mitigation cannot be implemented)* Widen to include the two EB and two WB through lanes *(physically feasible but this mitigation will not be implemented due to current Mission Valley Community Plan Update; discussed in Section 5.2.3.4 below)* Implement TDM Program
		PM	**54.2**	**F**	**93.6**	**F**	20.3	C	(33.9)	
	1-lane Roundabout	AM	13.5	B	17.0	C	10.4	B	(3.1)	
		PM	**54.2**	**F**	**93.6**	**F**	**92.6**	**F**	**38.4**	
	Enhanced All-Way Stop	AM	13.5	B	17.0	C	13.0	B	(0.5)	
		PM	**54.2**	**F**	**93.6**	**F**	32.1	D	(22.1)	

Footnotes:
a. Average delay expressed in seconds per vehicle.
b. Level of Service.
c. Δ denotes an increase or (decrease) in delay due to project mitigation.
General Notes:
1. **Bold** typeface indicates intersections operating at LOS E or F

Source: LLG, 2015

Table 5.2-15
Existing + Project Street Segment Mitigation Analysis

Street segment	Classification	Capacity[a]	Existing			Existing + Project			Mitigation Classification	Mitigation Capacity	Existing + Project and Mitigation				Mitigation
			ADT[b]	LOS[c]	V/C[d]	ADT	LOS	V/C			ADT	LOS	V/C	Δ[e]	
Hotel Circle N.															
I-8 WB Ramps to Fashion Valley Road	3-Lane Collector *(no center lane)*	15,000	**16,800**	**F**	**1.120**	**17,180**	**F**	**1.145**	4-Lane Collector *(continuous left-turn lanes)*	22,500[f]	17,180	D	0.764	(0.356)	Widen to accommodate a second WB through lane (*physically feasible but this mitigation will not be implemented due to current Mission Valley Community Plan Update; discussed in Section 5.2.3.4*) Implement TDM program
Fashion Valley Road to Camino De La Reina	2-Lane Collector *(continuous left-turn lane)*	15,000	**13,170**	**E**	**0.878**	**13,560**	**E**	**0.904**	3-Lane Collector *(continuous left-turn lane)*	22,500[g]	13,560	C	0.603	(0.275)	Widen to accommodate a second WB lane (*physically feasible but this mitigation will not be implemented due to current Mission Valley Community Plan Update; discussed in Section 5.2.3.4*) Implement TDM program
Hotel Circle S.															
I-8 EB Ramps to Bachman Place	2-Lane Collector *(continuous left-turn lane)*	15,000	**14,390**	**E**	**0.959**	**14,780**	**E**	**0.985**	3-Lane Collector *(continuous left-turn lane)*	22,500[g]	14,780	C	0.657	(0.302)	Widen to a 3-Lane Collector with a continuous left-turn lane (*physically infeasible; therefore this mitigation cannot be implemented)* Implement TDM program
Bachman Place to Camino De La Reina	2-Lane Collector *(continuous left-turn lane)*	15,000	**14,350**	**E**	**0.957**	**14,750**	**E**	**0.983**	3-Lane Collector *(continuous left-turn lane)*	22,500[g]	14,750	C	0.656	(0.301)	Widen to a 3-Lane Collector with a continuous left-turn lane *(physically infeasible; therefore this mitigation cannot be implemented)* Implement TDM program

Footnotes:
a. Capacity based on roadway classification operating at LOS E.
b. Average Daily Traffic.
c. Level of Service.
d. Volume to Capacity.
e. Δ denotes a project mitigation-induced increase or (decrease) in the Volume to Capacity ratio.
f. An upgraded capacity of 22,500 ADT was assumed since this roadway does not have any driveways and this best represents its functional classification.
g. Capacity derived based on the interpolation between the capacities of a 4-Lane Collector with continuous left-turn lane and a 2-Lane Collector with continuous left-turn lane, from the City of San Diego Roadway Classification Table

General Notes*:*
Bold typeface indicates segments operating at LOS E or F
Source: LLG, 2015

project features that provide mobility options and support the proposed project as a TOD. The intent of the TDM program is to reduce peak period vehicle trips by creating a truly integrated mixed-use community that maximizes use of pedestrian and bicycle travel, transit, carpools, and vanpools.

To conduct an effective TDM evaluation, the TRIMMS model (Trip Reduction Impacts for Mobility Management Strategies) was used. The TRIMMS Model is sensitive to change in travel behavior that might occur with the use of facilities, management services, incentives, and disincentives that promote use of carpooling, vanpooling, transit, bicycling, and walking.

It is estimated that 468 residents would occupy the UT site. As shown in Table 5.2-16, with the site-specific model inputs and employees mode of travel derived from the 2010 US Census, the TRIMMS model estimated an employee trip generation of 736 average daily vehicle trips[1] and 399 peak period[2] vehicle trips for the UT site.

The project team developed an extensive list of TDM strategies that included a range of measures from 'basic' support actions (e.g., preferential ridesharing and marketing, ridematching), and incentives for vanpooling and transit.

Table 5.2-16
Resident Mode of Travel and Vehicle Trips

Means of Travel	% Residents	Daily Vehicle Trips	Peak Period Vehicle Trips
Auto - Drive Alone	74.0%	693	375
Carpool	9.0%	42	23
Vanpool	0.8%	1	1
Transit	14.2%	0	0
Bike	1.0%	0	0
Walk	1.0%	0	0
Other	0.0%	0	0
Total	**100%**	**736**	**399**

Source: LLG, 2015

Table 5.2-17 shows the two (2) strategies that were evaluated for the proposed project. The two strategies are a combination of the basic, vanpool, and transit measures discussed in the TIA (Appendix B of this EIR).

Table 5.2-17
TDM Summary Table

TDM Strategies	***Residents*** **Work Trips (736 ADT)**[b]	
	ADT	**%**
Basic + Transit Strategies: – *Preferential Bike and Rideshare Parking and Marketing* – *Transit Incentives (including first month free)*	85	11.5%
Total TDM Reduction (%) based on TIA project trips (1,128 ADT)	**85**	**7.5%**

Source: LLG, 2015
Footnotes:
a. Resident work trips from TDM TRIMMS model.
General Notes:
1. ADT – average daily trips.

[1] TRIMMS estimates of trips include trips to and from worksites for employees and homes for residents.
[2] TRIMMS defines the peak period as 7:00 am to 10:00 am and 4:00 pm to 7:00 pm

Based on the above strategies, the Applicant proposes to implement *Strategies 1 and 2*, which include the highest trip reduction of 85 daily trips (7.5% of the total project trips) as the proposed TDM measure. The following Mitigation Measure will be implemented as part of the proposed project:

T-1 The Applicant shall implement a TDM program using Strategies 1 and 2 (Basic + Transit) as described below and in the TIA prepared by Linscott, Law and Greenspan, that includes the following:

- Provide a mixed-use, 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.
- 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.
- 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.
- The provision of a charging station(s) for electric vehicles.
- The project will coordinate with local transit operators to provide input on how and when routes should be implemented to serve the area.
- Transportation information will be displayed in common areas to include, at a minimum, the following materials:
    - Ridesharing promotional materials, including the iCommute program.
    - 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.
    - Bicycle route and parking including maps and bicycle safety information.
    - Materials publicizing Internet and telephone numbers for referrals on transportation information.
    - Promotional materials provided by MTS and other publically supported transportation organizations.
    - A listing of facilities at the site for carpoolers / vanpoolers, transit riders, bicyclists, and pedestrians, including information on the availability of preferential carpool / vanpool parking spaces and the methods for obtaining these spaces.

- 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.
- Annual events will be held to promote the use of alternative transportation.
- Bicycle racks will be provided for resident and / or retail employee use.
- The UT project will provide flexible work schedules to stagger arrivals and departures of employees.

  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.

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.

Implementation of Mitigation Measure T-1 will result in some trip reduction but will not mitigate the traffic intersection and street segment impacts in the Existing + Project Scenario described in Table 5.2-12 to a level of less than significant. With implementation of the proposed project and Mitigation Measure T-1, the significant and unavoidable impacts described in Section 5.2.3.2 will remain.

B. Near-Term (Opening Day 2017) Conditions

In the Near-Term (Opening Day 2017) scenario, project related traffic is calculated to cause significant direct impacts within the study area. The improvements are summarized in Tables 5.2-18 and 5.2-19. The following intersection and street segment improvements are identified to mitigate the Near-Term (Opening Day 2017) significant "direct" impacts. As shown in Tables 5.2-18 and 5.2-19 below, the identified mitigation would reduce the project impacts to a level of 'not significant'. For the purposes of this report, a level of 'not significant' reflects allowable delay increases within City defined thresholds. A Project mitigation diagram, demonstrating the identified mitigation for the impacted intersection and street segments is shown in Figure 5.2-9.

INTERSECTION MITIGATION MEASURES

<u>Hotel Circle S. / I-8 EB Ramps</u>

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).

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.

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.

Table 5.2-18
Near-Term (Opening Day 2017) Intersection Mitigation Analysis

Intersection	Control Type	Peak Hour	Near-Term		Near-Term + Project		Near-Term + Project and Mitigation			Mitigation
			Delay[a]	LOS[b]	Delay	LOS	Delay	LOS	Δ[c]	
Hotel Circle S. / I-8 EB Ramps	Signal	AM	13.6	B	14.2	C	**13.2**	B	(0.4)	Signalize (*infeasible; therefore this mitigation cannot be implemented)*
		PM	**55.5**	**F**	**62.5**	**F**	20.5	C	(35.0)	
	1-lane Roundabout	AM	13.6	B	14.2	B	10.5	B	(3.1)	Construct a 1-lane roundabout (*infeasible; therefore this mitigation cannot be implemented)*
		PM	**55.5**	**F**	**62.5**	**F**	**92.7**	**F**	**37.2**	
	Enhanced All-Way Stop	AM	13.6	B	14.2	B	13.1	B	(0.5)	Widen to include the two EB and two WB through lanes *(physically feasible but this mitigation will not be implemented due to current Mission Valley Community Plan Update; discussed in Section 5.2.3.4 below)*
		PM	**55.5**	**F**	**62.5**	**F**	33.4	D	(22.1)	Implement TDM Program

Footnotes:
a. Average delay expressed in seconds per vehicle.
b. Level of Service.
c. Δ denotes an increase or (decrease) in delay due to project mitigation.
General Notes:
Bold typeface indicates intersections operating at LOS E or F
Source: LLG, 2015

Table 5.2-19
Near-Term (Opening Day 2017) Street Segment Mitigation Analysis

Street segment	Classification	Capacity[a]	Near-Term			Near-Term + Project			Mitigation Classification	Mitigation Capacity	Near-Term + Project and Mitigation				Mitigation
			ADT[b]	LOS[c]	V/C[d]	ADT	LOS	V/C			ADT	LOS	V/C	Δ[e]	
Hotel Circle N.															
I-8 WB Ramps to Fashion Valley Road	3-Lane Collector *(no center lane)*	15,000	**16,850**	**F**	**1.123**	**17,230**	**F**	**1.149**	4-Lane Collector *(continuous left-turn lanes)*	22,500[f]	17,230	D	0.766	(0.357)	Widen to accommodate a second WB through lane (*physically feasible but this mitigation will not be implemented due to current Mission Valley Community Plan Update; discussed in Section 5.2.3.4*) Implement TDM program
Fashion Valley Road to Camino De La Reina	2-Lane Collector *(continuous left-turn lane)*	15,000	**13,250**	**E**	**0.883**	**13,640**	**E**	**0.909**	3-Lane Collector *(continuous left-turn lane)*	22,500[g]	13,640	C	0.606	(0.277)	Widen to accommodate a second WB lane (*physically feasible but this mitigation will not be implemented due to current Mission Valley Community Plan Update; discussed in Section 5.2.3.4*) Implement TDM program
Hotel Circle S.															
I-8 EB Ramps to Bachman Place	2-Lane Collector *(continuous left-turn lane)*	15,000	**14,440**	**E**	**0.963**	**14,830**	**E**	**0.989**	3-Lane Collector *(continuous left-turn lane)*	22,500[g]	14,830	C	0.659	(0.304)	Widen to a 3-Lane Collector with a continuous left-turn lane *(physically infeasible; therefore this mitigation cannot be implemented)* Alternatively, implement TDM program
Bachman Place to Camino De La Reina	2-Lane Collector *(continuous left-turn lane)*	15,000	**14,430**	**E**	**0.962**	**14,830**	**E**	**0.989**	3-Lane Collector *(continuous left-turn lane)*	22,500[g]	14,830	C	0.659	(0.303)	Widen to a 3-Lane Collector with a continuous left-turn lane *(physically infeasible; therefore this mitigation cannot be implemented)* Implement TDM program

Source, LLG, 2015

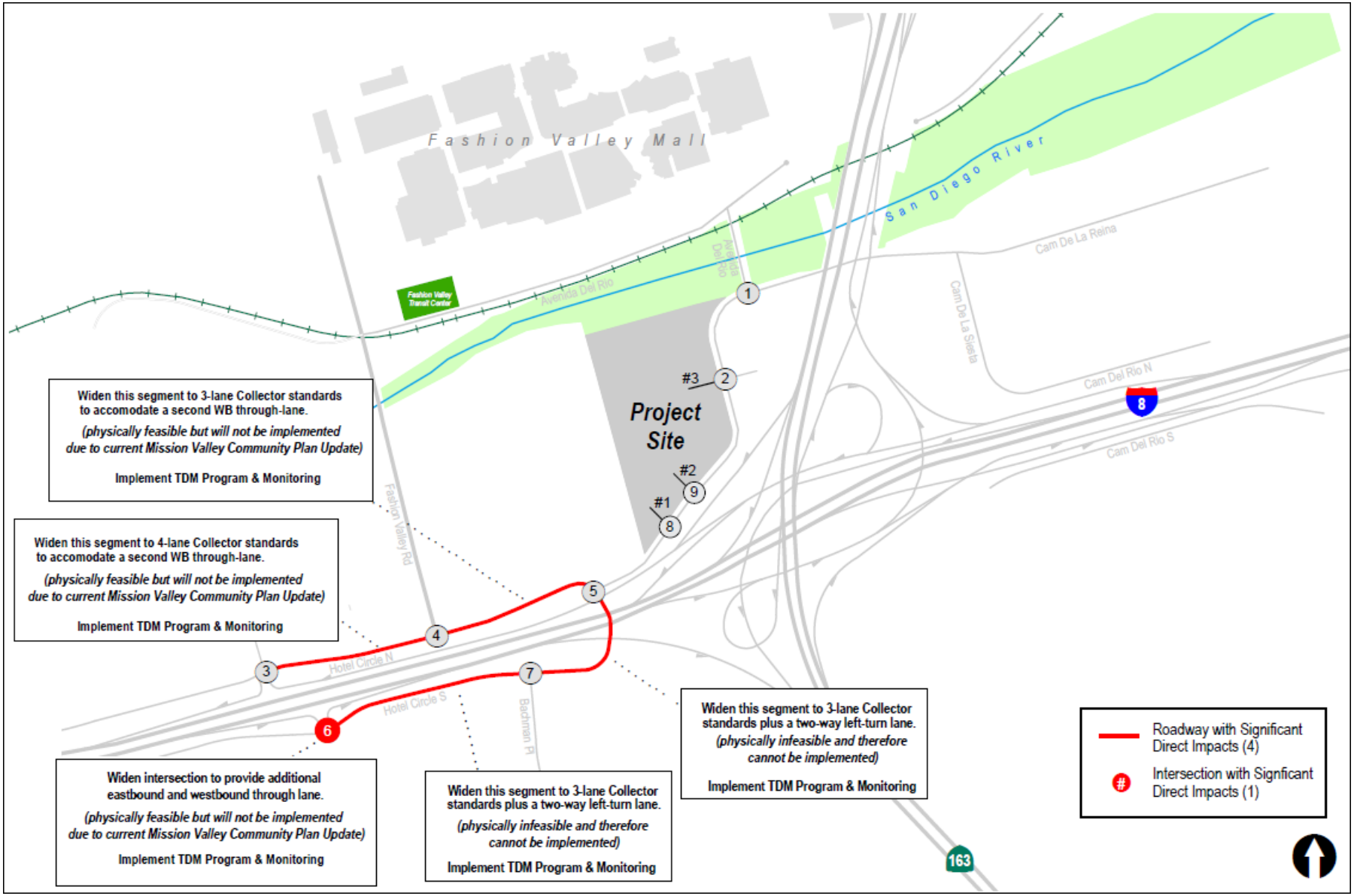
Footnotes:

a. Capacity based on roadway classification operating at LOS E.
b. Average Daily Traffic.
c. Level of Service.
d. Volume to Capacity.
e. Δ denotes a project mitigation-induced increase or (decrease) in the Volume to Capacity ratio.
f. An upgraded capacity of 22,500 ADT was assumed since this roadway does not have any driveways and this best represents its functional classification.
g. Capacity derived based on the interpolation between the capacities of a 4-Lane Collector with continuous left-turn lane and a 2-Lane Collector with continuous left-turn lane, from the City of San Diego Roadway Classification Table.

General Notes*:*

Bold typeface indicates segments operating at LOS E or F

Source: LLG, 2015



SOURCE: Linscott, Law & Greenspan, 2015

2/13/15

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Union Tribune Mixed Use Project EIR

Near-Term Impacts & Mitigation Measures

FIGURE 5.2-9

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.

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.

STREET SEGMENT MITIGATION MEASURES

Hotel Circle N.: I-8 WB Ramps to Fashion Valley Road

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 implement this improvement and impacts along this street segment would remain significant and unavoidable.

Hotel Circle N.: Fashion Valley Road to Camino De La Reina

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 & 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.

Hotel Circle S.: I-8 EB Ramps to Bachman Place

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 conducted as part of the TIA, this widening is deemed infeasible due to building structures fronting Hotel Circle South that would allow 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.

Hotel Circle S.: Bachman Place to Camino De La Reina

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. 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.

Mitigation Conclusions

With implementation of the proposed project in the Near-Term + Project scenario, one (1) intersection and four (4) street segments have the potential to result in significant and unavoidable impacts. In an effort to reduce the potential significant impacts, the Applicant shall implement Mitigation Measure T-1, as described above, which requires implementation of a TDM program. As described in Section 5.2.3.3 above, Mitigation Measure T-1 would not mitigate the Near-Term traffic impacts described in Table 5.2-13. With implementation of the proposed project and Mitigation Measure T-1, the significant and unavoidable impacts described in Section 5.2.3.2 would remain.

5.2.3.4 Impacts After Mitigation

As identified above, the proposed project would have significant direct and cumulative impacts at one intersection and street segments.

As discussed in Section 5.2.3.3, a preliminary mitigation feasibility analysis was conducted as part of the TIA based upon the proposed mitigation measures for each significantly impacted intersection and street segment. The feasibility analysis determined that the measures proposed would be infeasible for various reasons. Mitigating impacts on the following street segments was found to be technically infeasible for both the Existing + Project Scenario and Near Term (Opening Day 2017):

- Hotel Circle S.: I-8 EB Ramps to Bachman Place
- Hotel Circle S.: Bachman Place to Camino De La Reina

Therefore, significant and unavoidable impacts are identified for these two street segments, because no feasible mitigation measures have been identified to reduce the impact to a level less than significant in the near term.

In addition, the following mitigation measures are identifed for the remaining intersections and street segments:

- Hotel Circle S./I-8 EB Ramps
- Hotel Circle N.: I-8 WB Ramps to Fashion Valley
- Hotel Circle N.: Fashion Valley Road to Camino De La Reina

As discussed in Section 6.0 – Cumulative Impacts of this EIR, with the implementation of Mitigation Measures CUM-1, CUM-4, and CUM-5, the Applicant shall provide a fair share contribution towards widening these intersections/street segments. However, under the Existing+Project Scenario and Near Term (Opening Day (2017) conditions, impacts at these intersections/street segments are identified as significant and unavoidable for the following reasons:

- Intersection at Hotel Circle S./I-8 EB Ramps: 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. Therefore, this impact would remain significant and unavoidable. With the implementation of Mitigation Measure CUM-1, the Applicant of the proposed project would provide a fair share contribution (4.3%) towards this improvement. This approach is being used due to the fact that the Mission Valley Community Plan is in the process of being updated, and the circulation element's ultimate street classifications may or may not remain the same.
- Street Segments:
  - Hotel Circle N.: I-8 WB Ramps to Fashion Valley
  - Hotel Circle N.: Fashion Valley Road to Camino De La Reina

  The Applicant will provide fair share contributions towards widening improvements on these street segments with the implementation of Mitigation Measures CUM-4 and CUM-5, respectively. However, the improvements will not be completed in the near term with the implementation of the proposed project.

As discussed in detailed in Section 5.1-Land Use of the EIR, the Strategic Framework section of the General Plan provides the overarching strategy for how the City will grow while maintaing the qualities that best define San Diego. Since there is little remaining developable vacant land in the City, General Plan policies represent a shift in focus from how to develop vacant land to how to reinvest in existing communtiies through infill development. Therefore, General Plan policies support changes in development patterns to emphasize combining housing, shopping, employment uses, schools, and civic uses, at different scales, in village centers. The General Plan incorporates the City of Villages strategy to focus growth into mixed-use activity centers that are pedestrian-friendly districts linked to an improved regional transit system.

A primary strategy of the General Plan is to reduce dependence on the automobile in order to achieve multiple and inter-related goals including: increasing mobility, preserving and enhancing neighborhood character, improving air quality, reducing storm water runoff, reducing paved surfaces, and fostering compact development and a more walkable city (City of San Diego, 2008). Reducing dependence on automobiles can reduce vehicle miles traveled, which, in turn, lowers greenhouse gas emissions. Additionally, it improves water quality by decreasing automobile-related oil and gas leaks that pollute water bodies throughout the City. The otherwise technically feasible traffic improvements at the two street segments and one intersection are considered infeasible because they would not reduce dependence on the automobile and would not encourage a reduction in vehicle miles traveled per capita, lower greenhouse gas emissions, or increase water quality.

As discussed in detail in Table 5.1-1 of Section 5.1-Land Use of this EIR, the proposed project will create a mixed use development, adding residential, retail, and open space uses to an existing office/compatible industrial use within 1,200 feet (walking distance) of the Fashion Valley Transit Center, which provides light rail and bus service connections to all regions of the County. The proposed project provides an opportunity for residents to live, work, play, and shop without the use of an automobile. The project has been designed to encourage pedestrian/bicycle use by providing direct connectivity along the San Diego River Path to the Fashion Valley Transit Center. As identified in Table 5.1-1 of this EIR, the proposed project is consistent with several of the General Plan goals and

policies related the the City Villages Strategy and TOD Guidelines. Some of the General Plan goals and policies that the proposed project is consistent with, which encourage the use of alternative modes of transportation to reduce vehicle miles traveled per capita, include but are not limited to the following:

- Reduce single-occupant vehicle traffic on congested streets and freeways. Improved efficiency of the street and freeway systems by means other then roadway widening or construction.
- Support and implement TDM strategies including, but not limited to alteranive modes of transportation, alternative work schedules, and telework.
- Consider TDM programs with achievable trip reduction goals as partial mitigation for development project traffic and air quality impacts.
- Implement the City of Villages concept for mixed-use, transit-oriented development as a way to minimize the need to drive by increasing opportunities for individual to live near where they work, offering a convenient mix of local goods and services, and providing access to high quality transit services.
- Promote the reduction in GHG emissions in accordance with SB 375 and the California Long-Term Energy Efficiency Strategic Plan; and promote consistency with the General Plan's City of Villages Strategy and other Citywide planning efforts.

Table 5.1-1 provides a full list of the project's confiormance to the various land use goals and policies of the City of San Diego.

As discussed above, the Applicant shall implement Mitigation Measure T-1, which requires implementaiton of a TDM program. However, the TDM program would only partially mitigate the proposed project's significant impacts to intersections and street segments; therefore, even with the implementation of the TDM program, the proposed project would result in significant and unavoidable impacts to the one intersection and four street segments identified above in Section 5.2.3.2.

Although the project would result in significant and unavoidable transportation impacts, the project is in conformance with many of the transit oriented goals and policies of the General Plan. Furthermore, the City is in the process of reviewing the Mission Valley Community Plan in light of the General Plan and the City Villages strategies. It is anticipated that changes may be made to the circulation system in Mission Valley once the Community Plan update is completed.

In addition, there are several benefits of the project which will help to reduce vehicle miles traveled per capita and other related environmental issues of concern such as air quality, storm water, and GHG emissions, including but not limited to the following:

- Improve overall walkability and bikeability connecting the proposed project to the work/live amenties in the Mission Valley Community;
- Embraces TOD with linking the San Diego River Path to the existing trolley and buses to create a TOD/Corporate Headquarters/Work-Live/Mixed Use development consistent with the City of Villages strategies of the General Plan;
- Implements a TDM program in an effort to reduce the project's vehicular trip generation; and,
- Meet the needs of mixed-use residential development in close proximity to existing transit.

5.2.4 Issue 2

Issue 2: Would the proposed project result in traffic generation in excess of Community Plan allocation?

5.2.4.1 Impact Analysis

According to the City of San Diego's Significance Determination Thresholds, impacts to transportation/traffic circulation/parking would be considered significant if:

- *A project would result in the construction of a roadway which is inconsistent with the General Plan and/or a community plan, the impact would be significant if the proposed roadway would not properly align with the other existing or planned roadways.*

The Mission Valley Community Plan Transportation Element established "Development Intensity Districts" to regulate the finite traffic capacity within the circulation system of the Mission Valley Community (City, 1985). The proposed project's PDO traffic generation was calculated using the proposed project's site plan supplemented by the existing traffic counts and the Mission Valley PDO Traffic Generation Thresholds of the Municipal Code. As shown in Table 5.2-20, the resultant project ADT is calculated to be 3,817 ADT. Given gross project acreage of 12.86 acres, the trips per acre are calculated as 296. The proposed project is located in Traffic Area 1 for Threshold 1 and Traffic District C for Threshold 2, as shown in Figure 5.2-10. The Municipal Code allows a traffic threshold of 150 ADT per acre for Threshold 1 and 417 ADT per acre for Threshold 2. Table 5.2-21 provides the threshold calculations for the proposed project for both Threshold 1 – Traffic Impact Area 1 and Threshold 2 – Traffic District C.

Table 5.2-20
Trip Generation Per Municipal Code

Land Use & Size	Trip Rate per Mission Valley PDO	Proposed Project ADT
Existing		
Commercial Office 168,570 SF	Existing Traffic Counts (northerly driveway)	2,071
Manufacturing Print Facility 191,550 SF	Existing Traffic County (southerly driveway)	546
Proposed		
Multi-Family Residential 200 Units (Over 30 DU/ac)	6/DU	1,200
Specialty Retail 3,000 SF	0	0
	Project Total	3,817

Source: LLG, 2015.

Table 5.2-21
Threshold Calculations

Mission Valley PDO Thresholds	Threshold (ADT/acre)	Project Trips (ADT/acre)	Exceeds Threshold?
Threshold 1 – Traffic Area 1	150	296	Yes
Threshold 2 – Traffic District C	417	296	No

Source: LLG, 2015.

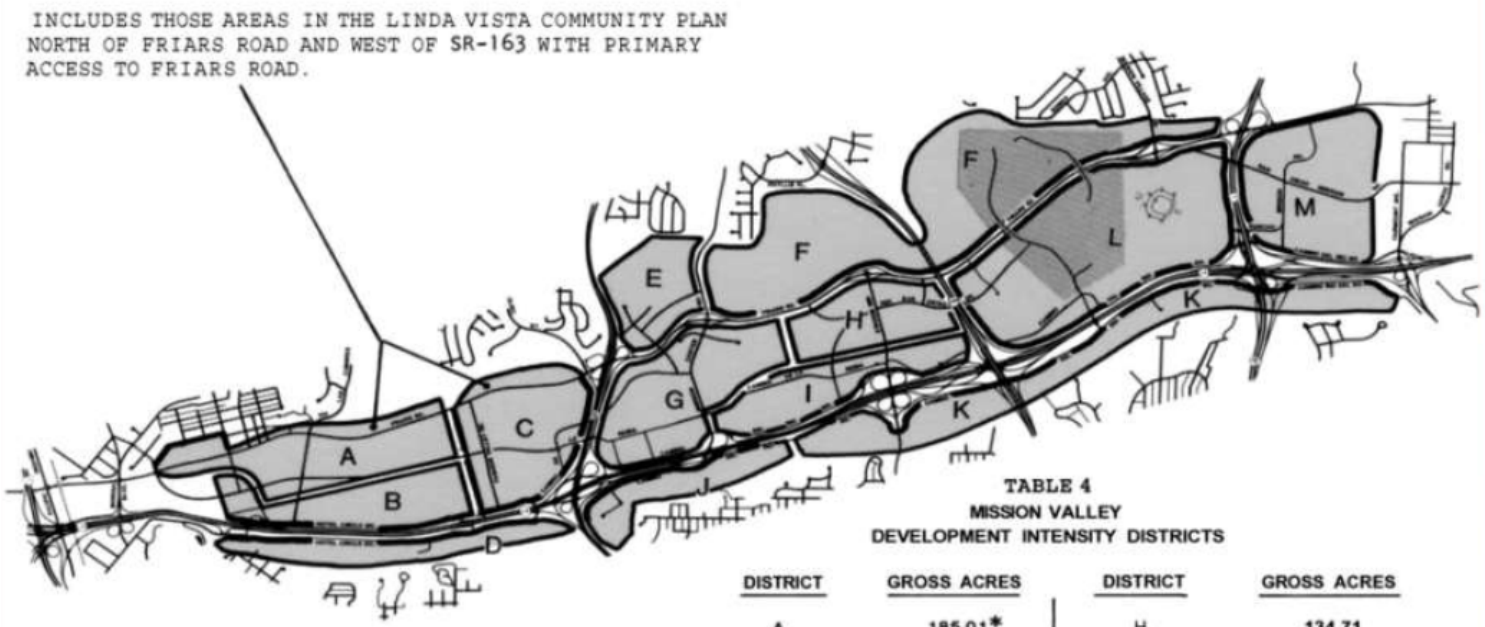


TABLE 4
MISSION VALLEY
DEVELOPMENT INTENSITY DISTRICTS

DISTRICT	GROSS ACRES	DISTRICT	GROSS ACRES
A.	185.01*	H.	134.71
B.	158.29	I.	120.06
C.	213.82*	J.	53.41*
D.	75.51*	K.	109.51*
E.	128.15*	L.	289.36
F.	407.12*	M.	209.58
G.	209.09		

* Net Acres (Exclusive of areas zoned HR)

Vehicle trip generation figures for each district (on a per acre basis) will be based upon the capacity of the street system. Current acceptable trip per acre figures are available in the Planning Department. The number of districts and the size of individual districts are subject to change during the implementation phase.

N

SOURCE: City of San Diego, 2014

10/23/14

BRG CONSULTING, INC.

Union Tribune Mixed Use Project EIR

Development Intensity Districts

FIGURE 5.2-10

The proposed project would consist of 3,000 square-feet of retail amenity space and 200 units of multi-family residential. The project would be a TOD that aims to reduce vehicle trips and promote various modes of transportation, which is achieved with the nearby Fashion Valley Transit Center located approximately 1,200 feet away from the project boundary. Based on the calculated trip generation in accordance to the City of San Diego Trip Generation Manual dated May 2003, the proposed project would generate a total of 1,140 average daily driveway trips with 17 inbound / 66 outbound trips during the AM peak hour and 68 inbound / 33 outbound trips during the PM peak hour. As shown in Table 5.2-20, the proposed project is expected to generate 296 ADT/acre, which is below Threshold 2 for Traffic District C and the project would not require an amendment to the Community Plan. The proposed project would not result in traffic generation in excess of the specific community plan allocation; therefore, no impact is expected. Please refer to Section 5.2.3 for detailed analyses of impacts to the local street system.

5.2.4.2 Significance of Impact

The proposed project would not result in traffic generation in excess of the specific community plan allocation.

5.2.4.3 Mitigation, Monitoring, Reporting

Since no impact has been identified for this issue area, no mitigation measures have been proposed.

5.2.4.4 Impacts After Mitigation

The proposed project would not pose traffic generation impacts in excess of the Community Plan allocation.

5.2.5 Issue 3

Issue 3: Would the proposed project result in the addition of a substantial amount of traffic to a congested freeway segment, interchange or ramp?

5.2.5.1 Impact Analysis

According to the City of San Diego's Significance Determination Thresholds, impacts to transportation/traffic circulation/parking would be considered significant if:

- *The project would add a substantial amount of traffic to a congested freeway segment, interchange, or ramp as shown in Table 5.2-6.*

The following analysis discusses impacts to the local street system, including freeway segments and freeway ramp meters, for the Existing + Project and Near-Term (Opening Day 2017) scenarios.

A. Existing + Project Conditions

FREEWAY SEGMENTS WERE ANALYZED UNDER THE EXISTING + PROJECT CONDITIONS.

As shown in Tables 5.2-22a and b, the following freeway segments were calculated to continue to operate at LOS E:

- SR-163 south of I-8, LOS E-PM (NB)
- I-8 between SR-163 and Mission Center Road, LOS E-PM (EB)

Based on City of San Diego significance criteria, the project traffic would not be expected to exceed the allowable significance threshold for freeway segment impacts in the Existing + Project conditions.

B. Near-Term (Opening Day 2017) Freeway Segment Operations

As shown in Table 5.2-23a and b, all freeway segments in the study area would operate at an acceptable LOS except for the following segments under the Near-Term (Opening Day 2017) conditions scenario:

- SR-163 south of I-8, LOS E-PM (NB)
- I-8 between SR-163 and Mission Center Road, LOS E-PM (EB)

Based on City of San Diego significance criteria, the project traffic would not be expected to exceed the allowable significance threshold for freeway segments impacts in the Near-Term (Opening Day 2017) conditions.

5.2.5.2 Significance of Impact

Based on the City of San Diego's significance criteria, there are no significant direct impacts identified to freeway segments, interchanges, or ramps within the project study area for the Existing + Project and Near-Term (Opening Day 2017) conditions scenarios. Therefore, the proposed project would not add a substantial amount of traffic to a congested freeway segment, interchange, or ramp; therefore, the impact would not be significant.

5.2.5.3 Mitigation, Monitoring, Reporting

Since no impact has been identified for this issue area, no mitigation measures have been proposed.

5.2.5.4 Impacts After Mitigation

The proposed project would not have significant direct impacts to the freeway segments, interchanges, or ramps within the project study area for the Existing + Project and Near-Term (Opening Day 2017) conditions scenarios.

5.2.6 Issue 4

Issue 4: Would the proposed project increase the demand for off-site parking?

5.2.6.1 Impact Analysis

Parking is not permitted along Camino de la Reina, Hotel Circle North, and Hotel Circle South (within the project study area).

The Union Tribune project is being redeveloped under discretionary permits. Parking shall comply with the Land Development Code based on the zoning and land uses (Currently LDC Section 142.0500) at the time building permits are applied for. The parking requirement also includes common area parking spaces for residential uses, disabled accessible, loading spaces, bicycle parking spaces, and motorcycle parking spaces. Parking and loading areas shall meet the requirements of the City's Land Development Code for off-street parking.

The mix of uses planned for the proposed project warrants the use of shared parking. Shared parking, when provided, shall be in accordance with Land Development Code provisions at the time building permits are applied for (Currently Section 142.0545). A shared parking analysis was also conducted for the existing office, print facility and proposed residential use to account for the synergy in uses. A total shared parking credit of 116 spaces was calculated (73 spaces between office/residential plus 43 spaces between office/print facility).

Under current LDC and Mission Valley Planned District Ordinance requirements, a maximum of 25% of the residential parking spaces may be unassigned and eligible for shared parking except that at least one space shall be assigned to each dwelling unit. In addition, whenever tandem parking is proposed, each tandem space shall be counted as two (2) spaces and shall be assigned to the same unit.

Table 5.2-22a
Existing + Project Freeway Segment Operations – AM Peak Hour

Freeway and Segment	Existing + Project ADT	Direction & Number of Lanes	Capacity[a]	Existing		Existing + Project		V/C Delta	Sig
				LOS[b]	V/C[c]	LOS	V/C		
SR-163									
Friars Road to I-8	151,190	NB Mainlines 4M+2CD+1A SB Mainlines 4M+2A	13,200 10,400	B B	0.589 0.619	B B	0.589 0.619	0.000 0.000	No No
South of I-8	161,140	NB Mainlines 3M+1A SB Mainlines 4M	7,200 8,000	D D	0.842 0.810	D D	0.842 0.811	0.000 0.001	No No
I-8									
West of Hotel Circle Ramps	190,170	EB Mainlines 4M WB Mainlines 4M+1A	8,000 9,200	B D	0.618 0.824	B D	0.618 0.825	0.000 0.001	No No
Hotel Circle Ramps to SR-163	199,270	EB Mainlines 4M+1A WB Mainlines[d] 4M+1A	9,200 9,200	B D	0.522 0.910	B D	0.556 0.910	0.004 0.000	No No
SR-163 to Mission Center Road	205,210	EB Mainlines 4M WB Mainlines 3M+2A	8,000 8,400	C C	0.758 0.761	C C	0.759 0.762	0.001 0.001	No No

Footnotes:

a. Capacity calculated at 2,000 vehicles/hour per mainline lane, 2,000 vehicles/hour per collector distributor lane and 1,200 vehicles/hour per aux lane (M: Mainline, CD: Collector Distributor, A: Auxiliary Lane). *Example:* 4M+2A=4 Mainlines + 2 Auxiliary Lanes.

b. Volume to Capacity.

c. Level of Service.

d. The UT project does not add project traffic to I-8 WB mainlines.

General Notes:

1. **Bold** typeface indicates intersections operating at LOS E or F

Source: LLG, 2015

Table 5.2-22b

Existing + Project Freeway Segment Operations – PM Peak Hour

Freeway and Segment	Existing + Project ADT	Direction & Number of Lanes	Capacity[a]	Existing		Existing + Project		V/C Delta	Sig
				LOS[b]	V/C[c]	LOS	V/C		
SR-163									
Friars Road to I-8	151,190	NB Mainlines 4M+2CD+1A	13,200	B	0.505	B	0.506	0.001	No
		SB Mainlines 4M+2A	10,400	B	0.603	B	0.604	0.001	No
South of I-8	161,140	NB Mainlines 3M+1A	7,200	**E**	**0.967**	**E**	**0.968**	**0.001**	No
		SB Mainlines 4M	8,000	D	0.841	D	0.842	0.001	No
I-8									
West of Hotel Circle Ramps	190,170	EB Mainlines 4M	8,000	C	0.775	C	0.776	0.001	**No**
		WB Mainlines 4M+1A	9,200	C	0.788	C	0.789	0.001	**No**
Hotel Circle Ramps to SR-163	199,270	EB Mainlines 4M+1A	9,200	C	0.772	C	0.773	0.001	**No**
		WB Mainlines[d] 4M+1A	9,200	D	0.811	D	0.811	0.000	**No**
SR-163 to Mission Center Road	205,210	EB Mainlines 4M	8,000	**E**	**0.989**	**E**	**0.990**	**0.001**	**No**
		WB Mainlines 3M+2A	8,400	C	0.763	C	0.765	0.002	**No**

Footnotes:

a. Capacities based on City of San Diego Roadway Classification Table. Capacity calculated at 2,000 vehicles/hour per mainline lane, 2,000 vehicles/hour per collector distributor lane and 1,200 vehicles/hour per aux lane (M: Mainline, CD: Collector Distributor, A: Auxiliary Lane). *Example:* 4M+2A=4 Mainlines + 2 Auxiliary Lanes.

b. Volume to Capacity.

c. Level of Service.

d. The UT project does not add project traffic to I-8 WB mainlines.

General Notes:

1. **Bold** typeface indicates intersections operating at LOS E or F

Source: LLG, 2015

Table 5.2-23a
Near-Term (Opening Day 2017) Freeway Segment Operations – AM Peak Hour

Freeway and Segment	Near-Term + Project ADT	Direction & Number of Lanes	Capacity[a]	Near-Term		Near-Term + Project		V/C Delta	Sig
				LOS[b]	V/C[c]	LOS	V/C		
SR-163									
Friars Road to I-8	153,370	NB Mainlines 4M+2CD+1A SB Mainlines 4M+2A	13,200 10,400	B B	0.596 0.619	B B	0.597 0.619	0.001 0.000	No No
South of I-8	161,040	NB Mainlines 3M+1A SB Mainlines 4M	7,200 8,000	D D	0.842 0.811	D D	0.842 0.811	0.000 0.001	No No
I-8									
West of Hotel Circle Ramps	190,130	EB Mainlines 4M WB Mainlines 4M+1A	8,000 9,200	B D	0.618 0.825	B D	0.618 0.826	0.000 0.001	No No
Hotel Circle Ramps to SR-163	199,060	EB Mainlines 4M+1A WB Mainlines[d] 4M+1A	9,200 9,200	B D	0.552 0.910	B D	0.556 0.910	0.004 0.000	No No
SR-163 to Mission Center Road	205,780	EB Mainlines 4M WB Mainlines 3M+2A	8,000 8,400	C C	0.758 0.767	C C	0.760 0.767	0.002 0.000	No No

Footnotes:

a. Capacities based on City of San Diego Roadway Classification Table. Capacity calculated at 2,000 vehicles/hour per mainline lane, 2,000 vehicles/hour per collector distributor lane and 1,200 vehicles/hour per aux lane (M: Mainline, CD: Collector Distributor, A: Auxiliary Lane). *Example:* 4M+2A=4 Mainlines + 2 Auxiliary Lanes.

b. Volume to Capacity.

c. Level of Service.

d. The UT project does not add project traffic to I-8 WB mainlines.

General Notes:

1. **Bold** typeface indicates intersections operating at LOS E or F

Source: LLG, 2015

Table 5.2-23b
Near-Term (Opening Day 2017) Freeway Segment Operations – PM Peak Hour

Freeway and Segment	Near-Term + Project ADT	Direction & Number of Lanes	Capacity[a]	Near-Term		Near-Term + Project		V/C Delta	Sig[e]
				LOS[b]	V/C[c]	LOS	V/C		
SR-163									
Friars Road to I-8	153,370	NB Mainlines 4M+2CD+1A SB Mainlines 4M+2A	13,200 10,400	B B	0.506 0.612	B B	0.507 0.613	0.001 0.001	No No
South of I-8	161,040	NB Mainlines 3M+1A SB Mainlines 4M	7,200 8,000	**E** D	**0.967** 0.842	**E** D	**0.968** 0.842	0.001 0.000	No No
I-8									
West of Hotel Circle Ramps	190,130	EB Mainlines 4M WB Mainlines 4M+1A	8,000 9,200	C C	0.776 0.789	C C	0.777 0.789	0.001 0.000	No No
Hotel Circle Ramps to SR-163	199,060	EB Mainlines 4M+1A WB Mainlines[d] 4M+1A	9,200 9,200	C D	0.772 0.811	C D	0.774 0.811	0.002 0.000	No No
SR-163 to Mission Center Road	205,780	EB Mainlines 4M WB Mainlines 3M+2A	8,000 8,400	**E** C	**0.995** 0.766	**E** C	**0.996** 0.768	0.001 0.002	No No

Footnotes:

a. Capacities based on City of San Diego Roadway Classification Table. Capacity calculated at 2,000 vehicles/hour per mainline lane, 2,000 vehicles/hour per collector distributor lane and 1,200 vehicles/hour per aux lane (M: Mainline, CD: Collector Distributor, A: Auxiliary Lane). *Example:* 4M+2A=4 Mainlines + 2 Auxiliary Lanes.

b. Volume to Capacity.

c. Level of Service.

d. The UT project does not add project traffic to I-8 WB mainlines.

General Notes:

1. **Bold** typeface indicates intersections operating at LOS E or F

Source: LLG, 2015

The operations of the printing facility are being reduced with the proposed project. Thus, the need for the additional truck parking along the north side of the printing facility is no longer required and would not significantly affect the function of the site.

As shown in Tables 5.2-24 and 5.2-25, the proposed project would require a minimum of 975 parking spaces under current LDC requirements and demonstrated in the shared parking analysis, and the project is proposed to provide 985 parking spaces, resulting in a surplus of 10 spaces.

5.2.6.2 Significance of Impact

The proposed project would provide a surplus of 10 parking spaces compared to the minimum required under LDC shared parking; therefore, the proposed project is not expected to have a significant impact on off-site parking.

5.2.6.3 Mitigation, Monitoring, Reporting

Since no impact has been identified for this issue area, no mitigation measures have been proposed.

5.2.6.4 Impacts After Mitigation

The proposed project is not expected to increase demand for off-site parking.

Table 5.2-24
Parking Requirements

Land Use	Size	Vehicular Minimum Parking Rate[a]	Minimum Parking Required[b]
Existing UT Office	**168,575 SF**	**2.9 / 1,000 SF**	**489 Spaces**
Accessible Parking (includes Van Accessible)	–	2% of Subtotal	9 Spaces
Motorcycle Parking	–	2% of Subtotal	10 Spaces
Bicycle Parking	–	0.1/ 1,000 SF	17 Spaces
Print Facility	**191,600 SF**	**–**	**283 Spaces**
Manufacturing	188,600 SF	1.5 / 1,000 SF	283 Spaces
Retail Amenity Space	3,000 SF	0.0 / 1,000 SF	0 Spaces
Accessible Parking (includes Van Accessible)	–	2% of Subtotal	0 Spaces
Motorcycle Parking	–	2% of Subtotal	0 Space
Bicycle Parking	–	0.1 / 1,000 SF	0 Space
Proposed Residential	**200 units**	**1.53 / unit**	**319 Spaces**
1 BD / 1 BA	63 units	1.25 per unit	79 Spaces
2 BD / 2 BA	99 units	1.75 per unit	174 Spaces
3 BD / 2 BA	18 units	2.00 per unit	36 Spaces
Flex Space Lofts	7 units	1.00 per unit	7 Spaces
Townhomes	13 units	1.75 per unit	23 Spaces
Accessible Parking (includes Van Accessible)	-	2% of Subtotal	7 Spaces
Motorcycle Parking	-	0.1 / unit	20 Spaces
Bicycle Parking	-	0.5 / unit	100 Spaces
Residential Visitor Parking	-	15% of Subtotal	48 Spaces
Residential Visitor Accessible Parking	-	2% of Subtotal	1 Space
Residential Visitor Van Accessible Parking	-	2% of Subtotal	1 Space
Total Parking Required			**1,091 Spaces**
Shared Parking Credit (office, printing facility and residential) at Peak Demand			**116 Spaces**
Net Parking Required			**975 Spaces**

Footnotes:
a. Transit area parking requirements were used given the project's proximity to Fashion Valley Transit Center.
b. See Table 13-2 of the TIA.
c. The proposed 3,000 SF retail amenity space is ancillary to the primary trip generated land uses on-site. Therefore, no parking demand is associated with this ancillary use.

General Notes:
1. Parking rates were based on City of San Diego, Land Development Code; Chapter 14, Article 2.

Source: LLG, 2015

Table 5.2-25
Parking Summary

Total Parking Required	975 Spaces
Total Parking Provided	985 Spaces
Surplus	**10 Spaces**

Source: LLG, 2015.

5.2.7 Issue 5

Issue 5: Would the proposed project increase traffic hazards for motor vehicles, bicyclists or pedestrians?

5.2.7.1 Impact Analysis

According to the City of San Diego's Significance Determination Thresholds, impacts to transportation/traffic circulation/parking would be considered significant if:

- *A project would increase traffic hazards to motor vehicles, bicyclists, or pedestrians due to proposed non-standard design features (e.g. poor sight distance, proposed driveway onto an access-restricted roadway), the impact would be significant.*

The proposed project includes the construction of a Class I bicycle/pedestrian path connecting Camino De La Reina with the existing bridge that leads to the MTS transit hub. These improvements would be consistent with the City's roadway standards, and would not create a hazard for vehicles, bicycles, or pedestrians entering or exiting the site. Information regarding on-site circulation and offsite circulation/queuing is provided below.

A. On-site Circulation

Direct site access would be provided along Camino De La Reina via three unsignalized driveways. Parking to the proposed residential uses would be accessible via Driveways #1 and #3. The driveway that currently serves the existing office building would serve as the main project driveway (Driveway #3) and would provide access to the proposed residential parking. This driveway would include full movements and would be realigned with the east leg of the intersection, which provides access to Mueller College (123 Camino De La Reina). Dedicated northbound and southbound left-turn lanes at the Camino De La Reina/Project Driveway #3 intersection would also be provided. Driveway #1 would also include access to residential parking along the western property edge. Driveway #1 would be restricted to allow right-in/right-out movements only. To enforce the right-in/right-out movements, the project proposes to construct a 10-foot wide and approximately 200-foot long raised median on Camino De La Reina fronting Driveway #1. No changes are proposed to project Driveway #2, which would remain full access to service newspaper delivery trucks. Internal circulation to all structures/buildings is provided via surface roadways. Traffic circles are provided fronting the main buildings to provide traffic calming and act as an appropriate traffic control. Designated pick-up/drop-off areas are also provided fronting each building.

In regards to truck circulation, trucks would utilize Driveway #2 on Camino De La Reina given that it allows full movement. The truck parking is located directly in front of the existing printing building to facilitate easy loading and unloading access.

5.2.7.2 Significance of Impact

The proposed project includes the construction of a Class I bicycle/pedestrian path connecting Camino De La Reina with the existing bridge leading to the MTS transit hub. In addition, the project is proposing to restripe the existing two-way left turn lane on Camino de la Reina at the main project driveway (Driveway #3) to provide left turn pockets, which will keep left turn traffic out of the through lane. These improvements would be designed consistently with the City's roadway standards, and the proposed project would not create a hazard for vehicles, bicycles, or pedestrians entering or exiting the site. Since no hazards are expected, no impact has been identified for this issue area.

5.2.7.3 Mitigation, Monitoring, Reporting

Since no impact has been identified for this issue area, no mitigation measures have been proposed.

5.2.7.4 Impacts After Mitigation

Since no hazards are expected, no impact has been identified for this issue area.

5.2.8 Issue 6

Issue 6: Does the proposed project conflict with adopted policies, plans or programs supporting alternative transportation modes (e.g. bus turnouts, bicycle racks)?

5.2.8.1 Impact Analysis

According to the City of San Diego's Significance Determination Thresholds, impacts to transportation/traffic circulation/parking would be considered significant if:

- *A project would result in the construction of a roadway which is inconsistent with the General Plan and/or a community plan, the impact would be significant if the proposed roadway would not properly align with the other existing or planned roadways.*

The proposed project is a TOD that supports the local policies, plans, and programs (such as the Mission Valley Community Plan, City of San Diego General Plan, and the 2050 Regional Transportation Plan [RTP]) encouraging use of alternative transportation. MTS bus stops are located approximately 500 feet from the project site and throughout the project study area, and the proposed project includes installation of bicycle parking, pedestrian walkways, and a Class I bicycle/pedestrian pathway to the existing nearby transit center. The Applicant shall also implement Mitigation Measure T-1, which requires implementation of a TDM program (as further described in Section 5.2.3.3), which would promote the use of these alternative modes of transportation. The proposed project would not remove any existing alternative transportation facilities. Although the project would not widen Camino de la Reina on its frontage to implement the Community Plan classification of a 4-lane major, which would include a Class II bike lane, the proposed project would provide an IOD and DIA to provide half width of a 4-lane major and Class II bike lane should this classification and bike lane be retained after the Community Plan update.

5.2.8.2 Significance of Impact

The proposed project would mostly support the adopted local policies, plans and programs. Furthermore, although the proposed project would not widen Camino de la Reina on the frontage to implement the Community Plan roadway classification of a 4-lane major, it would provide an IOD and DIA to provide half-width of a 4-lane major and Class II

bike lane should this classification and bike lane be retained after the Community Plan update. Therefore, in this way the proposed project would not result in the construction of a roadway that is inconsistent with the General Plan and/or a community plan. Therefore, no impact has been identified for this issue area.

5.2.8.3 Mitigation, Monitoring, Reporting

Since no impact has been identified for this issue area, no mitigation measures have been proposed.

5.2.8.4 Impacts After Mitigation

The proposed project would have no impact on the adopted local plans and programs supporting alternative transportation models.

5.2.9 Issue 7

Issue 7: What effects would the proposed project have on existing parking?

5.2.9.1 Impact Analysis

According to the City of San Diego's Significance Determination Thresholds, impacts to parking would be considered significant if:

- *A project would result in a substantial restriction in access to publicly or privately owned land.*

As further described in Section 5.2.6, the proposed project would provide 985 parking spaces, which provides a surplus of 10 parking spaces onsite from what is required by the City of San Diego parking requirements.

5.2.9.2 Significance of Impact

The proposed project would provide a surplus of 10 parking spaces onsite; therefore, the proposed project does not result in an impact to off-site parking. In addition, the proposed project would not result in a substantial restriction in access to publicly or privately owned land; therefore, the impact would not be significant.

5.2.9.3 Mitigation, Monitoring, Reporting

Since no impact has been identified for this issue area, no mitigation measures have been proposed.

5.2.9.4 Impacts After Mitigation

The proposed project would not have a significant impact on existing parking.

5.2.10 Issue 8

Issue 8: Would the proposed project have a substantial impact on existing or planned transportation systems?

5.2.10.1 Impact Analysis

According to the City of San Diego's Significance Determination Thresholds, impacts to transportation/traffic circulation/parking would be considered significant if:

- *A project is inconsistent with the General Plan and/or a community plan, the impact would be significant if the proposed roadway would not properly align with the other existing or planned roadways.*

As described above in Section 5.2.3, the proposed project is located within 1,200 feet from the Fashion Valley Transit Center which is serviced by the Trolley Green Line every 15 minutes. Additionally, the proposed project study area has several bus stations, seven bus routes that serve the transit center, and pedestrian walkways. The proposed project would maintain the existing bus stops and add a Class I bicycle/pedestrian pathway and pedestrian walkways, as well as add additional bicycle and pedestrian improvements. Although the proposed project would not widen Camino de la Reina on the frontage to implement the Community Plan roadway classification of a 4-lane major, it would provide an IOD and DIA to provide half-width of a 4-lane major and Class II bike lane should this classification and bike lane be retained after the Community Plan update.

5.2.10.2 Significance of Impact

The proposed project includes the construction of a Class I bicycle/pedestrian path connecting Camino De La Reina with the existing bridge leading to the MTS transit hub. These improvements would be designed consistently with the City's roadway standards. In addition, the proposed project is a TOD and the Applicant would implement Mitigation Measure T-1, which requires the implementation of a TDM program described in Section 5.2.3.3. Furthermore, the proposed project would provide an IOD and DIA for widening along the project frontage of Camino De La Reina to accommodate its future classification. Therefore, no impact has been identified for this issue area.

5.2.9.3 Mitigation, Monitoring, Reporting

Since no impact has been identified for this issue area, no mitigation measures have been proposed.

5.2.9.4 Impacts After Mitigation

The proposed project would not have a significant impact on the existing or planned transportation systems.

5.2.10 Conclusion

The proposed project would result in significant and unavoidable impacts to one intersection and four street segments. A mitigation feasibility analysis was conducted as part of the TIA based upon the proposed mitigation measures for each significantly impacted intersection and street segment. The feasibility analysis determined that mitigating these impacts would be infeasible for various reasons, as further described in Section 5.2.3.3 above. In an effort to reduce trip generation from the project site, the Applicant shall implement Mitigation Measure T-1, which requires implementation of a TDM program. However, the TDM program would only partially mitigate the proposed project's significant impacts to intersections and street segments; therefore the proposed project would result in significant and unavoidable impacts to all intersections and street segments previously identified in Section 5.2.3.2, Significance of Impacts. As such, implementation of the TDM program would not mitigate the impacts to below a level of significance. Therefore, a significant and unavoidable impact to one intersection and four street segments is identified with the implementation of the proposed project.

The proposed project would not result in any impacts to existing freeway segments, interchanges, or ramps, and would not increase traffic hazards to motor vehicles, bicyclists, or pedestrians. The project is consistent with the *City of San Diego General Plan and Mission Valley Community Plan*. Lastly, the project would provide additional access to publicly owned land via the San Diego River Park Pathway.

5.3 Greenhouse Gas Emissions

This section of the EIR discusses the potential environmental impacts of the proposed project associated with greenhouse gas emissions. Information contained in this section is summarized from the *Greenhouse Gas Assessment* for the Union Tribune Mixed-Use Project, prepared by Ldn Consulting, Inc. (Ldn), dated October 6, 2014 (Appendix C of this EIR). This document is provided on the attached CD of Technical Appendices found on the back cover of this EIR.

5.3.1 Existing Conditions

Greenhouse gases such as water vapor and carbon dioxide are abundant in the earth's atmosphere. These gases are called "Greenhouse Gases" because they absorb and emit thermal infrared radiation which acts like an insulator to the planet. Without these gases, the earth's ambient temperature would either be extremely hot during the day or blisteringly cold at night. However, because these gases can both absorb and emit heat, the earth's temperature does not sway too far in either direction.

Over the years, as human activities resulted in burning fossil fuels, stored carbon has been released into the air in the form of Carbon Dioxide (CO_2) and to a much lesser extent Carbon Monoxide (CO). Scientists have measured this rise in CO_2 in the atmosphere, and fear that it may be heating the planet. It is believed that other greenhouse gases such as Methane and Nitrous Oxide contribute to planetary heating.

Greenhouse Gases of concern as analyzed in this study are CO_2, Methane (CH_4), and Nitrous Oxide (N_2O). To simplify greenhouse gas (GHG) calculations, both CH_4 and N_2O can be converted to an equivalent amount of CO_2 or CO_2e. CO_2e is calculated by multiplying the predicted levels of CH_4 and N_2O by a Global Warming Potential (GWP) or a multiplication factor measure of how much a given mass of greenhouse gas is estimated to contribute to global warming relative to the same mass of carbon dioxide (whose GWP is by convention equal to 1). The exact calculations are complicated however; the U.S. Environmental Protection Agency (U.S. EPA) publishes GWPs for various GHGs and reports that the GWP for CH_4 and N_2O is 21 and 310, respectively.

5.3.1.1 Regulatory Setting

A. International Regulations

The United States is, and has been, a participant in the United Nations Framework Convention on Climate Change (UNFCCC) since it was produced by the United Nations in 1992. The UNFCCC is an international environmental treaty with the objective of, "stabilization of GHG concentrations in the atmosphere at a level that would prevent dangerous anthropogenic interference with the climate system." This is generally understood to be achieved by stabilizing global GHG concentrations between 350 and 400 ppm, in order to limit the global average temperature increases between 2 and 2.4°C above preindustrial levels. The UNFCC itself does not set limits on GHG emissions for individual countries or enforcement mechanisms. Instead, the treaty provides for updates, called "protocols," that would identify mandatory emissions limits.

Kyoto Protocol

The Kyoto Protocol established commitments for industrialized nations to reduce their collective emissions of six GHGs (CO_2, CH_4, N_2O, SF_6, HFCs, and PFCs) to 5.2% below 1990 levels by 2012. The United States is a signatory

of the Kyoto Protocol, but Congress has not ratified it and the United States has not bound itself to the Protocol's commitments. The first commitment period of the Kyoto Protocol ended in 2012. Governments, including 38 industrialized countries, agreed to a second commitment period of the Kyoto Protocol, beginning January 1, 2013 and ending either on December 31, 2017 or December 31, 2020, to be decided by the Ad Hoc Working Group on Further Commitments for Annex I Parties under the Kyoto Protocol at its seventeenth session. In Durban (17th session of the Conference of the Parties in Durban, South Africa, December 2011), governments decided to adopt a universal legal agreement on climate change as soon as possible, but not later than 2015. Work will begin on this immediately under a new group called the Ad Hoc Working Group on the Durban Platform for Enhanced Action. Progress was also made regarding the creation of a Green Climate Fund (GCF) for which a management framework was adopted.

B. Federal Regulations

Climate Change Technology Program

The Climate Change Technology Program (CCTP) is a multi-agency research and development coordination effort (led by the Secretaries of Energy and Commerce) that discharged with carrying out the President's National Climate Change Technology Initiative. The U.S. EPA's guidance document is directed at state agencies responsible for air pollution permits under the Federal Clean Air Act (FCAA) to help them understand how to implement GHG reduction requirements while mitigating costs for industry.

C. State Regulations

Assembly Bill (AB) 1943

AB 1493 (2002), referred to as "Pavley," requires ARB to develop and adopt regulations to achieve "the maximum feasible and cost-effective reduction of GHG emissions from motor vehicles." On June 30, 2009, EPA granted the waiver of Clean Air Act preemption to California for its greenhouse gas emission standards for motor vehicles beginning with the 2009 model year.

Executive Order (EO) S-3-05

EO S-3-05 establishing statewide GHG emissions reduction targets. EO S-3-05 provides that by 2010, emissions shall be reduced to 2000 levels; by 2020, emissions shall be reduced to 1990 levels; and by 2050, emissions shall be reduced to 80% of 1990 levels. In response to EO S-3-05, California Environmental Protection Agency (CalEPA) created the Climate Action Team (CAT), which in March 2006 published the Climate Action Team Report (the "2006 CAT Report"). The 2006 CAT Report identified a recommended list of strategies that the state could pursue to reduce GHG emissions. These are strategies that could be implemented by various state agencies to ensure that the emission reduction targets in EO S-3-05 are met and can be met with existing authority of the state agencies.

The California Global Warming Solutions Act (AB 32)

Operating under the assumption that Global Warming is a real phenomenon and that atmospheric CO_2 is the single largest contributor to the phenomenon, the California State Legislature passed the California Global Warming Solutions Act of 2006 (AB 32) which requires the California Air Resources Board (CARB) to develop regulations and mechanisms that will ultimately reduce California's greenhouse gas emissions by 25% by 2020. Mandatory caps will begin in 2012 for significant sources and ratchet down to meet the 2020 goals. Specifically, AB 32 requires CARB to:

1) Establish a statewide greenhouse gas emissions cap for 2020, based on 1990 emissions by January 1, 2008.
2) Adopt mandatory reporting rules for significant sources of greenhouse gases by January 1, 2009.
3) Adopt a plan by January 1, 2009 indicating how emission reductions will be achieved from significant greenhouse gas sources via regulations, market mechanisms and other actions.
4) Adopt regulations by January 1, 2011 to achieve the maximum technologically feasible and cost-effective reductions in greenhouse gas, including provisions for using both market mechanisms and alternative compliance mechanisms.
5) Convene an Environmental Justice Advisory Committee and an Economic and Technology Advancement Advisory Committee to advise CARB.
6) Ensure public notice and opportunity for comment for all CARB actions.
7) Prior to imposing any mandates or authorizing market mechanisms, CARB must evaluate several factors, including but not limited to, impacts on California's economy, the environment and public health; equity between regulated entities; electricity reliability; conformance with other environmental laws; and that the rules do not disproportionately impact low-income communities.

Scoping Plan

After completing a comprehensive review and update process, the ARB approved a 1990 statewide GHG level and 2020 limit of 427 million metric tons of CO_2e ($MMTCO_2e$). A Scoping Plan was approved by ARB on December 11, 2008, and includes measures to address GHG emission reduction strategies related to energy efficiency, water use, recycling, and solid waste, among other measures.

EO S-01-07

EO S-01-07 was enacted on January 18, 2007. The order mandates that a Low Carbon Fuel Standard ("LCFS") for transportation fuels be established for California to reduce the carbon intensity of California's transportation fuels by at least 10% by 2020.

Senate Bill (SB) 97

SB 97, signed in August 2007, acknowledges that climate change is an environmental issue that requires analysis in California Environmental Quality Act (CEQA) documents. In March 2010, the California Resources Agency (Resources Agency) adopted amendments to the State CEQA Guidelines for the feasible mitigation of GHG emissions or the effects of GHG emissions. The adopted guidelines give lead agencies the discretion to set quantitative or qualitative thresholds for the assessment and mitigation of GHGs and climate change impacts.

Senate Bill (SB) 375

Senate Bill (SB) 375, signed in August 2008, enhances the State's ability to reach AB 32 goals by directing ARB to develop regional greenhouse gas emission reduction targets to be achieved from vehicles for 2020 and 2035. In addition, SB 375 directs each of the state's 18 major Metropolitan Planning Organizations (MPO) to prepare a "sustainable communities strategy" (SCS) that contains a growth strategy to meet these emission targets for inclusion

in the Regional Transportation Plan (RTP). On September 23, 2010, ARB adopted final regional targets for reducing greenhouse gas emissions from 2005 levels by 2020 and 2035.

ARB Resolution 07-54

ARB Resolution 07-54 establishes 25,000 metric tons of GHG emissions as the threshold for identifying the largest stationary emission sources in California for purposes of requiring the annual reporting of emissions. This threshold is just over 0.005% of California's total inventory of GHG emissions for 2004.

Senate Bill (SB) 2X

In April 2011, Governor Brown signed SB 2X requiring California to generate 33% of its electricity from renewable energy by 2020.

D. Local Regulations and CEQA Requirements

The adopted State CEQA Guidelines provide general regulatory guidance on the analysis and mitigation of GHG emissions in CEQA documents, but contain no suggested thresholds of significance for GHG emissions. Instead, they give lead agencies the discretion to set quantitative or qualitative thresholds for the assessment and mitigation of GHGs and climate change impacts. The South Coast Air Quality Management District (SCAQMD) has adopted quantitative significance thresholds for GHGs. In order to serve as a guide for determining when a project triggers the need for a GHG significance determination, the City of San Diego has established an interim screening threshold for GHG emission analysis. Based on guidance in the CAPCOA report "CEQA & Climate Change," dated January 2008, the City's memorandum entitled "Addressing Greenhouse Gas Emissions from Projects Subject to CEQA" (City of San Diego 2010) utilizes a screening threshold of 900 $MTCO_2e$ as a conservative threshold for requiring further analysis of GHG emissions.

California Air Pollution Controls Officers Association (CAPCOA) CO_2 Screening Levels

CAPCOA and CARB currently publish CO_2 screening levels for use in CEQA reporting. The screening level is set at 900 $MTCO_2e$ per year and is 'recommended' for all new projects within the State of California for compliance with the intent of AB 32. Operational levels due to a proposed project action above the 900 metric ton screening value will be subject to additional recommendations for compliance.

Climate Protection Action Plan

In July 2005, the City developed a Climate Protection Action Plan (CPAP) that identified policies and actions to decrease GHG emissions from City operations. Recommendations included in CPAP for transportation included measures such as increasing carpooling and transit ridership, improving bicycle lanes, and converting the City vehicle fleet to low emission or non-fossil-fueled vehicles. Recommendations in the CPAP for energy and other non-transportation emissions reductions included increasing building energy efficiency (i.e., requiring that all City projects achieve the U.S. Green Building Council's LEED Silver standard); reducing waste from City operations; continuing use of landfill methane as an energy source; reducing the urban heat island by avoiding dark roofs and roads which absorb and retain heat; and increasing shade tree and other vegetative cover plantings.

Climate Action Plan

A citywide Climate Action Plan (CAP) is currently being developed by the City. It is being designed to provide a mechanism for the City to achieve the goals of AB 32 and the CARB Scoping Plan at a program level. The CAP elements were prepared pursuant to guidance from the amended CEQA Guidelines and CARB recommendations for what constitutes an effective GHG reduction plan. Section 15183.5 of the amended CEQA Guidelines includes requirements for plans that serve to tier and streamline the analysis of GHG emissions. The City's CAP is intended to establish a planning horizon through 2035; quantify GHG emissions; establish GHG reduction targets for 2020; identify strategies and measures to reduce GHG emissions; and provide guidance for monitoring progress on an annual basis.

City of San Diego Conservation Element

There are no specific local quantitative regulations that have been promulgated to control GHG emissions; however, both the City of San Diego and SANDAG have adopted policies and standards to reduce emissions in the area. The City of San Diego first adopted climate change policies in its City of San Diego Climate Protection Action Plan (City of San Diego 2005). That plan identified sources of GHGs within the City and identified policies and developed recommendations to reduce GHG emissions. The City of San Diego's General Plan (2008) addresses climate change in the Conservation Element of the plan. Policies that address local GHG mitigation strategies in San Diego are integrated within the General Plan, and applicable to development projects. Together, this collection of policies support and promote the adopted recommendations outlined in the City's Climate Protection Action Plan. Typically, these policies are implemented through the use of updated building codes or architectural plans. As part of the Conservation Element, the City's policies pertinent and related to Climate Change and Sustainable Development from a private developer's perspective are:

CE.A.9:

Reuse building materials, use materials that have recycled content, or use materials that are derived from sustainable or rapidly renewable sources to the extent possible, through factors including:

- *Scheduling time for deconstruction and recycling activities to take place during project demolition and construction phases;*
- *Using life cycle costing in decision-making for materials and construction techniques. Life cycle costing analyzes the costs and benefits over the life of a particular product, technology, or system;*
- *Removing code obstacles to using recycled materials in buildings and for construction;*
- *Implementing effective economic incentives to recycle construction and demolition debris (see also Public Facilities Element, Policy PF-I.2).*

CE.A.10:

Include features in buildings to facilitate recycling of waste generated by building occupants and associated refuse storage areas.

a. *Provide permanent, adequate, and convenient space for individual building occupants to collect refuse and recyclable material.*

b. *Provide a recyclables collection area that serves the entire building or project. The space should allow for the separation, collection and storage of paper, glass, plastic,* metals, yard waste and other materials as needed.

CE.A.11:

Implement sustainable landscape design and maintenance.

a. *Use integrated pest management techniques, where feasible, to delay, reduce, or eliminate dependence on the use of pesticides, herbicides, and synthetic fertilizers.*

b. *Encourage composting efforts through education, incentives, and other activities.*

c. *Decrease the amount of impervious surfaces in developments, especially where public places, plazas and amenities are proposed to serve as recreation opportunities (see also Recreation Element, Policy RE-A.6 and A.7).*

d. *Strategically plant deciduous shade trees, evergreen trees, and drought tolerant native vegetation, as appropriate, to contribute to sustainable development goals.*

e. *Reduce use of lawn types that require high levels of irrigation.*

f. *Strive to incorporate existing mature trees and native vegetation into site designs.*

g. *Minimize the use of landscape equipment powered by fossil fuels.*

h. *Implement water conservation measures in site/building design and landscaping.*

i. *Encourage the use of high efficiency irrigation technology, and recycled site water to reduce the use of potable water for irrigation. Use recycled water to meet the needs of development projects to the maximum extent feasible. (see Policy CE-A.12).*

CE.A.12:

Reduce the San Diego Urban Heat Island, through actions such as:

- *Using cool roofing materials, such as reflective, low heat retention tiles, membranes and coatings, or vegetated eco-roofs to reduce heat build-up;*
- *Planting trees and other vegetation, to provide shade and cool air temperatures. In particular, properly position trees to shade buildings, air conditioning units, and parking lots;*
- *Reducing heat buildup in parking lots through increased shading or use of cool paving materials as feasible (see also Urban Design Element, Policy UD-A.12).*

SANDAG Climate Action Strategy

SANDAG's Climate Action Strategy is a guide for SANDAG on climate change policy. The Strategy identifies a range of potential policy measures for consideration as SANDAG updates long-term planning documents like the Regional Transportation Plan and Regional Comprehensive Plan, and as local jurisdictions update their General Plans and other community plans. The goals of the Climate Action Strategy include the reduction of vehicle miles traveled and use of alternatives modes of transportation.

SANDAG has also developed in accordance with California Senate Bill 375 (SB 375); the Sustainable Communities Strategy (SCS) is a new element of the 2050 Regional Transportation Plan (RTP). The legislation requires Metropolitan Planning Organizations (MPO) to prepare a SCS as part of their RTPs, along with the traditional policy, action, and financial requirements. After more than two years of extensive public input, the SANDAG Board of Directors adopted the final RTP with a SCS on October 28, 2011, making it the first agency in California to do so. The SCS lays out how the region will meet GHG reduction targets set by CARB. CARB's targets call for the region to reduce per capita emissions 7% by 2020 and 13% by 2035 from a 2005 baseline. There are no mandated targets beyond 2035.

Under SB 375, which went into effect in 2009, a SCS must demonstrate how development patterns and transportation network, policies, and programs can work together to achieve greenhouse gas emission reduction targets for cars and light trucks, if there is a feasible way to do so. If a MPO cannot meet the targets through a SCS, then the region is required to develop an alternative planning strategy that demonstrates how targets could be achieved. In essence, the SCS includes four building blocks:

1. *A land use component that accommodates the Regional Housing Needs Assessment (RHNA) and includes the protection of sensitive resources, including areas protected under habitat conservation plans;*
2. *Transportation networks including highways, transit, and local streets and roads;*
3. *Transportation demand management strategies; and*
4. *Transportation system management programs and policies.*

5.3.2 Issue 1

Issue 1: Would the project generate greenhouse gas emissions, either directly or indirectly, that may have a cumulatively significant impact on the environment?

5.3.2.1 Impact Analysis

The City's Significance Determination Thresholds do not identify quantitative thresholds for determining significance of GHG emissions. For the purpose of determining significance, the analysis below is based on guidance contained in Appendix G of the State CEQA Guidelines. Specific guidance on addressing GHG emissions is included in the latest adopted amendments to the State CEQA Guidelines (adopted in December 2009), which became effective on March 18, 2010. Based on Appendix G of the State CEQA Guidelines, GHG emission impacts would be significant if the project would:

- *Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment.*

As discussed in Section 15064.4 of the CEQA Guidelines, the determination of the significance of greenhouse gas emissions calls for a careful judgment by the lead agency, consistent with the provisions in Section 15064. Section 15064.4 further provides that a lead agency should make a good-faith effort, based to the extent possible on scientific and factual data, to describe, calculate, or estimate the amount of GHG emissions resulting from a project. A lead agency shall have discretion to determine, in the context of a particular project, whether to:

1. Use a model or methodology to quantify greenhouse gas emissions resulting from a project, and which model or methodology to use. The lead agency has discretion to select the model or methodology it considers most appropriate provided it supports its decision with substantial evidence. The lead agency should explain the limitations of the particular model or methodology selected for use; and/or
2. Rely on a qualitative analysis or performance-based standards.

Section 15064.4 also advises a lead agency to consider the following factors, among others, when assessing the significance of impacts from greenhouse gas emissions on the environment:

1. The extent to which the project may increase or reduce greenhouse gas emissions as compared to the existing environmental setting;
2. Whether the project emissions exceed a threshold of significance that the lead agency determines applies to the project; and
3. The extent to which the project complies with regulations or requirements adopted to implement a statewide, regional, or local plan for the reduction or mitigation of greenhouse gas emissions.

In order to serve as a guide for determining when a project triggers the need for a GHG significance determination, the City of San Diego has established an interim screening threshold for GHG emission analysis. Based on guidance in the CAPCOA report "CEQA & Climate Change," dated January 2008, the City's memorandum entitled "Addressing Greenhouse Gas Emissions from Projects Subject to CEQA" (City of San Diego 2010) utilizes a screening threshold of 900 $MTCO_2e$ as a conservative threshold for requiring further analysis of GHG emissions. Projects with emissions above the 900 metric ton threshold are required to evaluate whether emissions can be reduced below "business as usual" (BAU) levels. The City has proposed a target of 28.35% below BAU as its significance threshold, based on the California ARB's Scoping Plan and year 2020 BAU forecast model, which represents the GHG emissions that would be expected to occur without any GHG project reducing features or mitigation as mandated under AB 32.

GHG emissions associated with the proposed project were estimated separately for seven categories of emissions: (1) project related construction emissions; (2) project related operation vehicular emissions; (3) project related electricity usage; (4) project related natural gas emissions; (5) project related solid waste emissions; (6) project related water usage; and (7) project cumulative totals.

A. Project-Related Construction Impacts

Utilizing the URBEMIS 2007 inputs for the model, grading and construction of the proposed project will produce approximately 27.12 $MTCO_2e$ annually. Given the fact that the total emissions will ultimately contribute to 2020 cumulative levels, it is acceptable to average the total construction emission over a 30 year period (SCAQMD 2008). A summary of the construction emissions is shown in Table 5.3-1 below.

B. Project Related Operation Vehicular Emissions

Utilizing URBEMIS traffic projections based on the proposed uses, the proposed project would be expected to create approximately 1,320 daily trips with an average trip distance of 5.8 miles. Therefore, given these assumptions, the proposed project could add as many as 7,656 Vehicle Miles per Day or 2,669,160 miles per year (based on 347 days to correct for weekend driving – CARB 2008). In order to obtain a realistic approximation of the BAU baseline

emissions the EMFAC 2011 model was run for 2020 which could be assumed to be BAU. The emissions from that model run were found to be 1,233.10 $MTCO_2e$ per year.

In addition, it should be noted that the project traffic study also calculated the trip reductions directly attributed to the mixed use design which has been found to greatly increase internal capture. The traffic study has been prepared using the Mixed-Use-Method (MXD) where it was recognized that a project of this type generates fewer trips cumulatively or combined rather than if each land use was constructed separated. This MXD approach concludes that the mixed-use project as designed would be expected to reduce BAU trips by as much as 13.6% to 180 trips. Furthermore, the proposed project would provide a linkage from the project site to the existing public transit system. The proposed project would help with regional reductions according to CAPCOA reduction strategy and our findings are conservative.

C. Project Related Electricity Usage

The proposed project would be expected to use a total of 952,850 KWh per year, which would generate 314.33 $MTCO_2e$ per year, which is shown in Table 5.3-1.

D. Project Related Natural Gas Usage

Natural gas energy consumption is typically shown in mmBTU in which the small m's are roman numerals representing 1,000 where mm is considered 1,000,000. Also, 1,000 cubic feet of natural gas is equivalent to one mmBTU. The proposed project would be expected to use 5,004.4 mmBTU per year. The equivalent CO_2 emissions are expected to be 266.214 $MTCO_2e$ per year as calculated in Table 5.3-1.

E. Project Related Solid Waste Emissions

The proposed project would create approximately 237.28 tons of trash each year, which would typically consist of paper, plastics and other types of waste. Utilizing the EPA's waste breakdown emission factors per type and multiplying those factors with the projected waste generation yields estimates for the proposed project at 48.31 $MTCO_2e$ per year. Table 5.3-1 shows how these results were calculated.

F. Project Related Water Usage

The proposed project would consume roughly 22,531,450 gallons of water annually. Therefore, the proposed project would require 286,149.4 kWh of electricity per year or 22.531 million gallons x 12,700 kWh/MG. This energy consumption would generate 94.40 $MTCO_2e$ per year as shown in Table 5.3-1.

G. Project Cumulative Totals

Cumulatively, the project could emit approximately 1,983.07 $MTCO_2e$ each year under a BAU scenario. Per guidelines of CAPCOA's 900 metric ton per year threshold, the proposed project would require a full analysis to demonstrate compliance with the City's reduction requirements of 28.35%. A summary of the totals are shown in Table 5.3-1.

5.3.2.2 Significance of Impact

Impacts were evaluated for significance using the City of San Diego's interim screening threshold of 900 $MTCO_2e$. For emissions that exceed this threshold and cannot be reduced to 28.35% below BAU levels, the impact is considered significant.

Table 5.3-1
Year 2020 Total GHG Emissions over BAU

CO_2e Generation – Business as Usual	**Total (Metric Tons per Year)**
Construction Related CO_2e	27.12
Offsite Vehicular CO_2e Emissions	1,233.10
Indirect Electricity Usage	314.33
Natural Gas Usage	266.21
Solid Waste Generation	48.31
Water Usage	94.40
Total Business as Usual Emissions	**1,983.47**
CO_2e Reduction Measures	**Total (Metric Tons per Year)**
Pavley Standards (20%)	-246.62
Alternative Transportation (<13%) – See URBEMIS Reduction Percentages	-222.82
Mixed Use Design (MXD Method)	-123.31
Indirect Electricity Use – Year 2020 Renewable Energy Generation by Utility (29%)	-91.16
Title 24 (2008) Efficiencies over Title 24 (2005) or 4.9% reduction (Electricity)	-15.40
Title 24 (2008) Efficiencies over Title 25 (2005) or 4.9% reduction (Natural Gas)	-13.04
Solid Waste Recycling Program per AB 341 (20% reduction)	-9.66
Water Usage – Year 2020 Renewable Energy Generation by Utility (29%)	-27.37
Total Reductions	**-722.01**
Operational Total (Total BAU Emissions – Total Reductions)	**1,261.45**
Combined CO_2e Reduction	**36.40%**

Source: Ldn Consulting, 2013

Combining all regulatory measures such as Pavley and other reduction strategies, the project would be expected to reduce CO_2e by 722.01 metric tons compared to BAU. As summarized in Table 5.3-1, the reduction measures would bring operational emissions down by 36.40%, which will meet and exceed the 28.35% reduction goal of AB 32 and the City of San Diego. Because operational emissions would exceed the interim screening threshold of 900 $MTCO_2e$, but be reduced by more than 28.35% below BAU levels, the overall impact of the project is not considered significant.

5.3.2.3 Mitigation, Monitoring, and Reporting

Implementation of the proposed project would not result in significant direct or cumulative impacts related to GHG emissions; and therefore, no mitigation measure is required.

5.3.2.4 Impacts After Mitigation

No mitigation would be required; therefore, there will be no impacts after mitigation.

5.3.3 Issue 2

Issue 2: Would the proposed project conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of greenhouse gases?

5.3.3.1 Impact Analysis

The City's Significance Determination Thresholds do not identify quantitative thresholds for determining significance of GHG emissions. For the purpose of determining significance, the analysis below is based on guidance contained in Appendix G of the State CEQA Guidelines. Specific guidance on addressing GHG emissions is included in the latest adopted amendments to the State CEQA Guidelines (adopted in December 2009), which became effective on March 18, 2010. Based on Appendix G of the State CEQA Guidelines, GHG emission impacts would be significant if the project would:

- *Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases.*

The project's consistency with applicable plans, policies, and regulations adopted for the purpose of reducing the emissions of GHGs has been evaluated. Applicable state and federal plans, policies, and regulations that are currently in effect are discussed under Regulatory Setting above. The City has adopted policies in both its Climate Protection Action Plan and General Plan that directly address GHG emissions, which set a goal of a 15% reduction in GHG emissions by 2010. The City identified various sectors that contribute to GHG emissions, and actions to reduce those emissions to meet the goals of AB 32. These are interim thresholds and nonetheless, a good faith effort has been made to evaluate whether GHG impacts from the proposed project are potentially significant, taking into account the type and location of the proposed development, the best available scientific data regarding GHG emissions, and the current statewide goals and strategies for the reduction of GHG emissions. In addition, the City's most recent General Plan includes various policies that address conservation with the goal of reducing GHG emissions by increase energy efficiency and increased use of alternative forms of transportation, among others. The proposed project would achieve a greater than 28.35% reduction from BAU and would implement a number of design features aimed at reducing GHG emissions, which are consistent with the City's applicable plans, policies, and regulations. As such, the project would not conflict with any of these plans.

5.3.3.2 Significance of Impact

The project would not conflict with the City's sustainable community program, Climate Protection Action Plan, Climate Action Plan, or General Plan. As such, implementation of the proposed project would result in a less than significant impact for this issue area.

5.3.3.3 Mitigation, Monitoring, and Reporting

No mitigation would be required.

5.3.3.4 Impacts After Mitigation

No mitigation would be required; therefore, there are no impacts after mitigation.

5.3.4 Conclusions

Although the proposed project would result in approximately 1,261.45 $MTCO_2e$ per year, with the implementation of reduction measures, the operational emissions would be reduced by 36.40%, which meets and exceeds the 28.35% reduction goal of AB 32 and the City of San Diego. In addition, the proposed project would be consistent with applicable plans, policies, and regulations adopted for the purpose of reducing GHG emissions. As such, the proposed project's contribution to cumulative GHG emissions and climate change would be less than significant.

5.4 Biological Resources

This section of the EIR describes the biological resources on the project site and discusses potential project impacts to these resources. Information contained in this section is summarized from the *Biological Resources Report* for the Union Tribune Mixed-Use Project dated January 26, 2015 prepared by Rocks Biological Consulting, Inc. (RBC), (Appendix D of this EIR). This document is provided on the attached CD of Technical Appendices found on the back cover of this EIR.

5.4.1 Existing Conditions

The overall project site is approximately 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 project is south of and adjacent to the Multi-Habitat Planning Area (MHPA) of the City's Multiple Species Conservation Program (MSCP). In this area the MHPA includes the habitat associated with the San Diego River. The site is near natural vegetation associated with the San Diego River, and all brush management would occur on-site in the form of fire access areas; no brush management beyond the parcel boundary is proposed.

The project site is relatively flat, and is developed with office buildings, associated driveways, parking areas and landscaping. Though the parcel itself is highly developed, areas off-site to the north are undeveloped and slope gently towards the San Diego River. Portions of the San Diego River north of the project site would be jurisdictional wetlands under local, state, and federal regulations, and part of this area would also be considered Waters of the U.S. under federal regulation. A storm water drain flows from the north-central edge of the parking area under curbs and into the undeveloped area to the north of the project. This storm drain spillway creates a small channel that presumably flows into the river during rain events. The channel supports limited vegetation. However, no wetland species were present and as such, would not qualify as a City-jurisdictional wetland.

A portion of the parcel to the north of the proposed project site is planned for use by the nearby Town & Country Resort and Conference Center to mitigate impacts of development in wetlands downstream of the proposed project site.

5.4.1.1 Methodology

RBC conducted a review of online databases to assist with biological resource mapping including, Geographic Information System (GIS) and incorporating relevant data including a color aerial photograph and the California Department of Fish and Wildlife's (CDFW) California Natural Diversity Database (CNDDB) information for the U.S. Geological Society 7.5-minute La Jolla Quadrangle.

On June 29, 2012, RBC conducted general surveys for plant and animal species on-site, under favorable conditions to detect most plant and animal species. However, animal activity at the time was low and certain winter and spring season species would not have been present. The biological survey included the mapping of vegetation communities and land uses within the project site and within a 100-foot mapping buffer. No focused surveys for plant species were conducted, and no formal wetland delineation was conducted. RBC performed focused surveys for the state and federally listed endangered Least Bell's Vireo in suitable habitat within 300 feet of the site. These surveys were performed in conformance with U.S. Fish and Wildlife Service (USFWS) protocol, with a total of eight surveys performed at least 10 days apart between April 10 and July 31, 2013.

5.4.1.2 Physical Setting

The project site is relatively flat, and is developed with office buildings, associated driveways, parking areas and landscaping. Though the project site itself is highly developed, areas off-site to the north are undeveloped and slope gently towards the San Diego River.

A. Plants

As a result of the biological survey, three vegetation communities were identified within the project parcel: developed/urban land (DEV), Eucalyptus Woodland (EUC), and Ornamental (ORN). Figure 5.4-1 depicts the location of the existing vegetation communities within and surrounding the project site. These vegetation communities on-site are described in detail below.

Developed/Urban Land

Developed areas typically support no vegetation because of the presence of roads, buildings, roadways, and other development. Developed land is not regulated by the environmental resource agencies and is included in the disturbed category (Tier IV) according to the City of San Diego Biology Guidelines. Therefore, impacts to these areas do not require mitigation. As depicted in Figure 5.4-1, the disturbed land/developed areas onsite include the existing Union Tribune offices, driveways, and associated parking areas, located in the center of the project site.

Eucalyptus Woodland

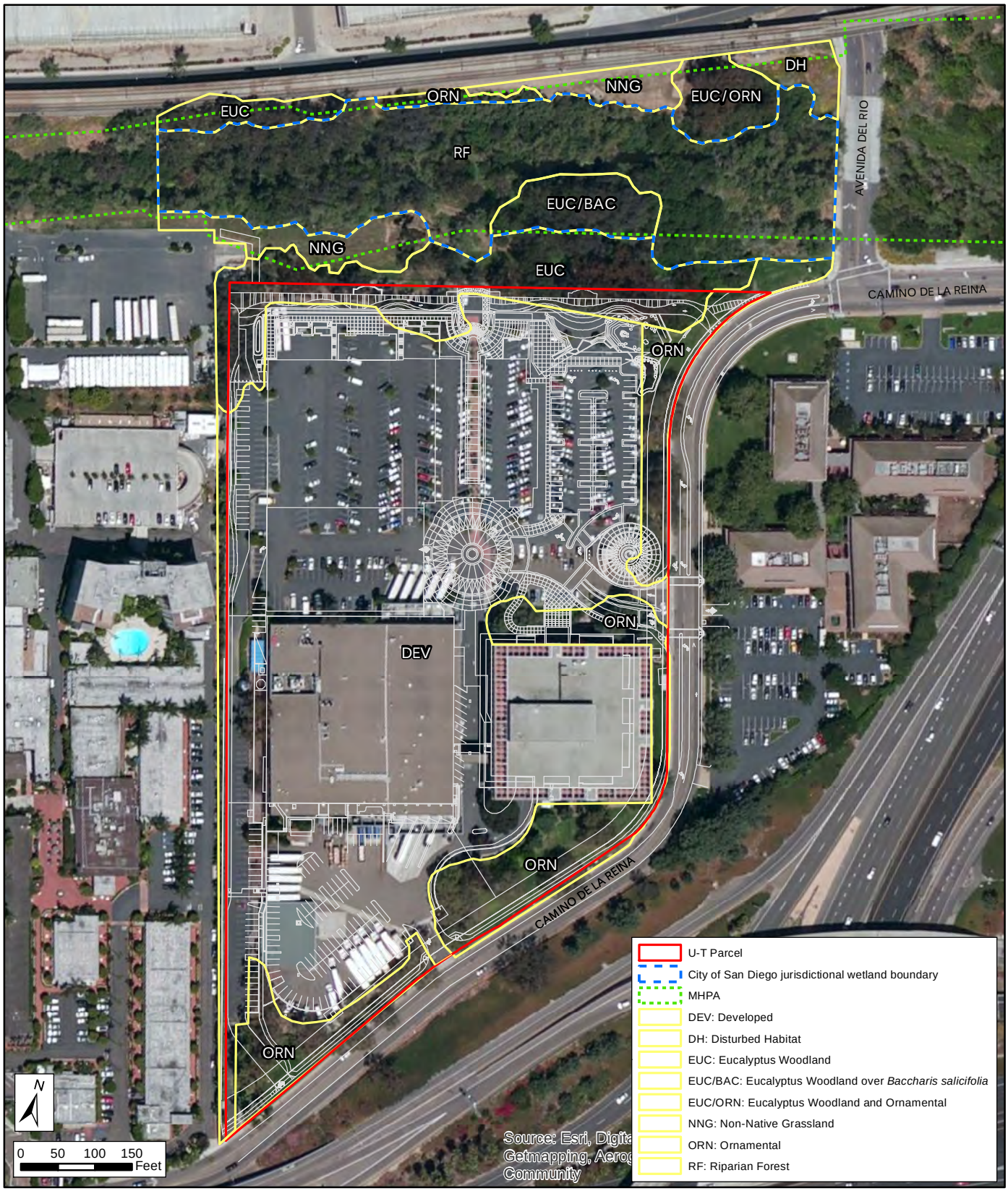
Eucalyptus Woodland communities are lands dominated by Eucalyptus trees. Little or no understory vegetation occurs in dense Eucalyptus Woodland because of the thick accumulation of leaf litter that tends to accumulate under Eucalyptus trees. Eucalyptus trees are a non-native species that were imported from Australia and are of limited biological value except for potential raptor roosting and nesting. Eucalyptus Woodland communities are not regulated by the environmental resource agencies and are included in the disturbed category (Tier IV) according to the City of San Diego Biology Guidelines. As depicted in Figure 5.4-1, the Eucalyptus Woodland communities are located on the northern portion of the project site.

Ornamental

Ornamental areas typically consist of non-native landscape and/or garden plantings that have been planted in association with development. San Diego County supports many ornamental trees, shrubs and herbs that decorate urban areas. Ornamental species are not regulated by the environmental resource agencies and are included in the disturbed category (Tier IV) according to the City of San Diego Biology Guidelines. As depicted in Figure 5.4-1, the ornamental species occur on-site in association with the offices and parking areas, and also occur off-site to the northeast near Camino de la Reina, where a portion of these plantings have encroached into the native habitats associated with the San Diego River. Also included in the ornamental category are native species that were planted within landscaped areas along Camino de la Reina. These include *Platanus racemosa* (Western Sycamore) and *Pinus terreyana* (Torrey Pine).

B. Wildlife

Wildlife species within the project site are typical of the developed nature of the area. Bird species noted on the project site were common species such as House Finch, Anna's Hummingbird, and Common Raven.



SOURCE: Esri, 2014; AVRP Studios, 2014; Rocks Biological Consulting, 2014

10/10/14

BRG CONSULTING, INC.

Union Tribune Mixed Use Project EIR

Biological Resources

FIGURE 5.4-1

C. Special Status Plants and Wildlife

General surveys were conducted for plant and animal species and habitats that are considered sensitive according to the USFWS, the California Native Plant Society (CNPS) and the CNDDB for the project area. These two matrices of special-status plant and wildlife species, their favorable habitat conditions, and their potential to occur on-site based on findings of the biological surveys are presented in the Biological Resources Report. Species considered special status under the MSCP Subarea Plan, including Narrow Endemic Species, are also included in the Biological Resources Report (Appendices D1 and D2 of this EIR). Narrow Endemic species are those with a very restricted habitat and occur only in the San Diego Region.

Special Status Plants

None of the plant species listed in the Biological Resources Report were detected during the biological survey. The proposed San Diego River Master Plan trail alignment north of the project site supports Non-Native Grassland and Eucalyptus Woodland with little or no understory, and would also not be expected to support rare or sensitive plant species. Based on the developed nature of the project area, the potential for other narrow endemic plant species in the immediate project area is low.

Special Status Wildlife

None of the wildlife species presented in the Biological Resources Report were detected on-site during the biological surveys. However, the river has been historically reported to support the state and federally-listed endangered Least Bell's Vireo, and this species was reported approximately 700 feet west of the project site in 1998 (RBC, 2014). Least Bell's Vireo is a migratory species that breeds in San Diego, where it typically inhabits willow-dominated riparian habitats. The river north of the project supports willow habitat conducive to Least Bell's Vireo use. Focused surveys were performed for the species in accordance with USFWS survey protocols from April to July 2013. Surveys for the species were negative. Although the protocol surveys were negative, the City of San Diego's MSCP Subarea Plan directs that the following Area Specific Management Directives (ASMD's) be adhered to for all projects within the City's MSCP plan area:

- ASMD's must include measures to provide appropriate successional habitat, upland buffers for all known populations, cowbird control, and specific measures to protect against detrimental edge effects to this species. Any clearing of occupied habitat must occur between September 15 and March 15 (i.e., outside of the nesting season).

Though the project would not result in direct impacts on habitat for the Least Bell's Vireo, it is adjacent to habitat that could support the species. As stated above, protocol surveys for this species were performed in spring/summer 2013 and were negative. The project complies with the San Diego River Natural Resource Management Plan directives to conform to the City's biological regulations and MSCP adjacency guidelines. The project would not impact any successional habitat adjacent to the River, and thus would not adversely impact any potential Least Bell's Vireo habitat. Re-development of the site would not introduce any new uses attractive to cowbirds; the site is already developed and is within a highly developed corridor so the project would not impact Least Bell's Vireo by introducing new uses attractive to cowbirds (e.g., horse stables, golf courses). Lastly, the project would not involve clearing of any potential Least Bell's Vireo habitat.

The river was also historically known to support the endangered Southwestern Willow Flycatcher. However, the species has not been recorded along the river since before 1997 and is most likely extinct in this area (RBC, 2014).

D. Wetlands and Wetlands Buffers

The proposed residential and office development is located within a previously developed area and does not support wetland vegetation and City-jurisdictional wetlands (RBC, 2014). There is a storm water drain that flows from the north-central edge of the parking area under curbs and into the undeveloped area to the north of the project. This storm drain spillway creates a small channel that presumably flows into the river during rain events. The channel supported limited vegetation; species that were present were not wetland species (i.e., *Hedera helix, Eucalyptus* sp.), and as such this area would not qualify as a City-jurisdictional wetland unless determined to be a wetland by other agencies. Due to the human-made nature of this channel, it would also not likely be deemed a state or federal jurisdictional wetland.

However, portions of the river north of the project site would be jurisdictional wetlands under local, state, and federal regulations, and part of this area would also be considered waters of the U.S. under federal regulation. Under the City of San Diego Biology Guidelines, the project would be required to maintain a wetland buffer around all wetlands as appropriate to protect the functions and values of the wetland, using Section 320.4(b)(2) of the U.S. Army Corps of Engineers General Regulatory Policies (33 CFR 320-330) list criteria for consideration when evaluating wetland functions and values. The following wetland buffer maintenance criteria have been taken into consideration during the design of the project:

- Wetlands which serve significant natural biological functions, including food chain production, general habitat and nesting, spawning, rearing and resting sites for aquatic or land species;
- Wetlands the destruction or alteration of which would affect detrimentally natural drainage characteristics, sedimentation patterns, salinity distribution, flushing characteristics, current patterns, or other environmental characteristics:
- Wetlands which serve as valuable storage areas for storm and flood waters;
- Wetlands which are ground water discharge areas that maintain minimum baseflows important to aquatic resources and those which are prime natural recharge areas;
- Wetlands which serve significant water purification functions;
- Wetlands which are unique in nature or scarce in quantity to the region or local area.

5.4.1.3 Multiple Species Conservation Program

The project lies within the City's MSCP Subarea, and is adjacent to the MHPA at its northern boundary. This urban habitat area, which follows the San Diego River through Mission Valley, contributes to the MSCP by providing habitat for native species, shelter and forage for migrating species, and linkages between biological core areas capable of supporting a diverse range of native species. Due to the project's adjacency with the MHPA, compliance with several MSCP Subarea Plan directives is required, in addition to compliance with the City's other MSCP implementing regulations, including MHPA adjacency guidelines. Compliance with MHPA adjacency guidelines and general management directives is discussed in Section 5.1 of this EIR.

5.4.2 Issue 1

Issue 1: Would the proposed project have a substantial adverse impact, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in the MSCP or other local or regional plans, policies or regulations, or by the California Department of Fish and Wildlife (CDFW) or U.S. Fish and Wildlife Service (USFWS)?

5.4.2.1 Impact Analysis

According to the City of San Diego's Significance Determination Thresholds, impacts to biological resources would be considered significant if the project would:

- *A substantial adverse impact, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in the MSCP or other local or regional plans, policies or regulations, or by the California Department of Fish and Wildlife (CDFW) or U.S. Fish and Wildlife Service (USFWS).*

The proposed project includes the redevelopment of the existing Mission Valley headquarters site of the San Diego Union Tribune as a mixed-use project offering residential housing, office and retail space. The majority of the project area is an existing office development and associated parking and ornamental planting areas.

Impacts are described as either direct or indirect and temporary or permanent. A direct impact may be defined as one that results in a temporary or permanent loss of individuals or habitat. An indirect impact may include the undetermined, potential effects of noise or introducing humans and/or pets to an area where access was previously restricted.

Direct Impacts

Plants

The retail and residential development would result in impacts to 0.67 acre of Eucalyptus Woodland and redevelopment of 10.21 acres of previously developed lands. Development of the associated Mission Valley Community Plan and San Diego River Park Master Plan trail would impact 0.02 acre of Non-Native Grassland and 0.01 acre of Eucalyptus Woodland. Total impacts are summarized in Table 5.4-1.

Table 5.4-1
Permanent Direct Impacts of the Project

Vegetation Community	MSCP Subarea Plan Type*	Acres
Non-Native Grassland	IIIB	0.02
Eucalyptus Woodland	IV	0.67
Developed/Urban	IV	10.21
Total		**10.90**

* Vegetation tiers are defined by the City of San Diego Biology Guidelines.
Source: RBC, 2014

Pursuant to the City of San Diego's *Significance Determination Guidelines Under the California Environmental Quality Act* (2012), "total upland impacts (Tier I-IIIB) less than 0.1 acre are not considered significant and do not require mitigation." Therefore, the proposed project's impacts to 0.02 acre of non-native grassland for construction of the

community trail would be considered *de minimis* and would not require mitigation. Impacts to Tier IV habitats are not considered significant and do not require mitigation. As such, no significant impacts to sensitive habitats would occur with the implementation of the proposed project.

Special Status Plants

No special status plants are known to occur within the study area. The small area of Eucalyptus Woodland and a narrow band of Non-Native Grassland for trail development has very little understory and does not appear to support habitat that would include rare plant species. As such, no significant direct impacts on special status plant species would occur with project implementation.

Special Status Wildlife

The adjacent river supports suitable habitat for the state and federally endangered Least Bell's Vireo. No evidence of the species was detected during USFWS protocol surveys performed in spring and summer 2013. However, the proposed project would still be consistent with the ASMD's for Least Bell's Vireo, as discussed in Section 5.4.1.2 above. As such, no significant direct impacts to sensitive wildlife species would occur with project implementation.

Indirect Impacts

Although the proposed project includes the addition of residential and retail uses to the project site, it is not anticipated to introduce any new uses that could result in significant indirect impacts. The proposed buildings would be higher than existing structures and would include more glass, which can have the potential to increase avian strikes. However, the proposed building windows that would be installed with the proposed project would be low reflective glass, the same as that proposed for the Chula Vista Waterfront Plan in consultation with the Audubon Society. Because these windows would be part of the project construction materials and are recommended by the Audubon Society, avian impacts are expected to be less than significant.

Minor erosion and dust are anticipated during project construction; however, these impacts are anticipated to be temporary and minor in nature and would be controlled by required pre- and post- construction water quality BMPs (as discussed in Section 5.11 of this EIR, and detailed in Appendices G1 and G2 of this EIR) and would be less than significant.

As shown in Figure 3-2 of this EIR, four bio-retention facilities would be sited in project landscape areas and would be accessed via storm drain infrastructure. As listed in Table 5.4-2, all bioswale plantings would be native species, and the detention basin plantings would be *Bouteloua dactyloides* (Buffalo Grass). According to the project landscape architect, river transition plantings would include species such as *Platanus racemosa* (California Sycamore), *Populus fremontii* (Western Cottonwood), and *Dendromecon rigida* (Bush Poppy). To avoid introduction of invasive species, project landscape plans would be reviewed by MSCP staff to ensure conformity with MSCP regulations and to ensure that no impacts on wetland buffer function and values of the area occur due to invasive introductions.

As such, because the proposed project development would occur within previously-developed areas; would improve on-site water infiltration and purification; and, would not introduce new invasive species to the area, no indirect wetland buffer impacts would occur with project implementation and the project would result in no net loss of functions or values in adjacent wetlands.

Table 5.4-2
Bioswale and Detention Basin Plant Palette

Scientific Name	Common Name
Bioswale Palette	
Carex spissa	San Diego Sedge
Juncus acutus ssp. *leopoldii*	Southwestern Spiny Rush
Juncus mexicanus	Mexican rush
Juncus patens	Spreading Rush
Muhlenbergia rigens	Deergrass
Detention Basin Palette	
Bouteloua [Buchloe] dactyloides	Buffalo Grass

Source: KTU+A, 2013; Rocks Biological Consulting, 2014

The project site is located adjacent to City MHPA land. Invasive plant species, especially wind-dispersed species, could migrate to these areas and have an adverse indirect impact on native habitat if invasive plants are planted on-site. With implementation of Mitigation Measure LU-1, identified in Section 5.1 of this EIR, any potential indirect impacts to sensitive habitat communities associated with invasive landscaping would be mitigated to a level less than significant.

5.4.2.2 Significance of Impact

Direct impacts to candidate, sensitive, or special status species are not anticipated as a result of project implementation. Potential indirect impacts anticipated include minor erosion and dust associated with project construction, but are not significant.

5.4.2.3 Mitigation, Monitoring, and Reporting

Implementation of Mitigation Measure LU-1 identified in Section 5.1 of this EIR would assure that the project is in compliance with the MSCP Subarea Plan's Land Use Adjacency Requirements; and that site specific requirements are noted on the grading plans under the heading Environmental Requirements.

5.4.2.4 Impacts After Mitigation

With implementation of Mitigation Measure LU-1, indirect impacts to sensitive habitat communities associated with potentially invasive landscaping would remain less than significant.

5.4.3 Issues 2 and 3

Issue 2: Would the proposed project have a substantial adverse impact on wetlands (including, but not limited to, marsh, vernal pool, riparian, etc.) through direct removal, filling, hydrological interruption, or other means?

Issue 3: Would the proposed project result in an introduction of invasive species of plants into a natural open space area?

5.4.3.1 Impact Analysis

According to the City of San Diego's Significance Determination Thresholds, impacts to biological resources would be considered significant if the project would:

- *A substantial adverse impact on wetlands (including, but not limited to, marsh, vernal pool, riparian, etc.) through direct removal, filling, hydrological interruption, or other means; and,*
- *An introduction of invasive species of plants into a natural open space area.*

A. Wetlands

The proposed project is located within a previously-developed area and does not support wetland vegetation and City-jurisdictional wetlands. The trail required under the City's Mission Valley Community Plan and San Diego River Park Master Plan would impact 0.02 acre of Non-Native Grassland and 0.01 acre Eucalyptus Woodland just north of the proposed UT development. This area does not meet City of San Diego wetland criteria as no hydric vegetation is present. Therefore, no significant direct impacts to wetlands would occur with project implementation.

B. Wetland Buffers

Pursuant to the City of San Diego's *Biology Guidelines,* Section II(A)(1)(b) provides guidance for maintenance of wetland buffers outside the coastal zone and requires that "a wetland buffer shall be maintained around all wetlands as appropriate to protect the functions and values of the wetland. Section 320.4(b)(2) of the U.S. Army Corps of Engineers General Regulatory Policies (33CFR 320-330) list criteria for consideration when evaluating wetland functions and values."

City-jurisdictional wetlands are located north of the project site along the San Diego River. The existing undeveloped wetland buffer surrounding this wetland area ranges in width from approximately 30 to 105 feet, averaging approximately 70 feet in width. The existing wetland buffer area would be maintained because the proposed project, including the San Diego River trail, would not encroach into the existing wetland buffer area.

C. Water Quality

The proposed project would occur in the same development area as the existing development, and as such, would not degrade existing wetland functions and values, including important water quality and wildlife movement functions. The existing undeveloped wetland buffer, ranging in width from approximately 30 to 105 feet and averaging approximately 70 feet, would be maintained between site development and City-jurisdictional wetlands. Additionally, the northern approximately 70 feet of the site would serve as a fire access area and walkways, and would be built with porous material, for total porous buffer from office or residential buildings ranging in width from 100 to 175 with an average of approximately 140 feet overall. The porous access area would allow increased water infiltration for site runoff and improve water quality runoff as compared to the existing condition under which much of the site runoff flows untreated into the wetland buffer and river.

According to the project drainage study preliminary calculations, there would be a decrease in overall runoff flow from the site (42.5 cfs to 28.1 cfs) as a result of the development. The overall flow (Q_{50}) was reduced because of the decrease in impervious surface area and increase in permeability from the existing condition to the proposed condition and because of the use of bioretention swales and basins. Flows similar to the existing condition have

either been reduced or routed to proposed bio-retention systems before ultimately discharging into the existing storm drain system or into the river. Four bio-retention facilities would be sited in project landscape areas and would be accessed via storm drain infrastructure during low flow events. Overall these facilities treat and capture stormwater in order to reduce pollutants, increase time of concentration, and reduce the runoff volumes associated with the proposed project. As such, the proposed project would improve stormwater runoff quality as compared to existing conditions, thus improving buffer and wetland water purification functions.

D. Invasive Plants

As discussed in Section 5.4.2.1 above, all bioswale, detention basin, and river transition plantings would be native species. To avoid potential invasive species being introduced to adjacent areas, project landscape plans would be reviewed by MSCP staff to ensure conformity with MSCP regulations and to ensure that no impacts on wetland buffer function and values of the area occur due to invasive introductions.

5.4.3.2 Significance of Impact

Because impacts to wetlands, wetland buffers, and/or the introduction of invasive species into a natural open space area are not anticipated as a result of project implementation, there are no significant impacts for biological resources Issues 2 and 3.

5.4.3.3 Mitigation, Monitoring, and Reporting

Because there are no impacts to wetlands or introduction of invasive species into a natural open space area anticipated as a result of project implementation, there are no mitigation, monitoring or reporting measures required.

5.4.3.4 Impacts After Mitigation

Because there are no significant impacts for biological resource Issues 2 and 3, and therefore no associated mitigation, monitoring, or reporting measures required, there remain no impacts after mitigation.

5.4.4 Issues 4, 5, 6, and 7 Impact Analysis

Issue 4: Would the project have a substantial adverse impact on any Tier I Habitats, Tier II Habitats, Tier IIIA Habitats, or Tier IIIB Habitats as identified in the Biology Guidelines of the Land Development Manual or other sensitive natural community identified in local or regional plans, policies or regulations, or by the CDFW or USFWS?

Issue 5 Would the proposed project result a conflict with the provisions of an adopted Habitat Conservation Plan, Natural Conservation Community Plan, or other approved local, regional, or state habitat conservation plan, either within the MSCP plan area or in the surrounding region?

Issue 6: Would the proposed project introduce land uses within an area adjacent to the MHPA that would result in adverse edge effects?

Issue 7: Would the proposed project result in a conflict with any local policies or ordinances protecting biological resources?

5.4.4.1 Impact Analysis

According to the City of San Diego's Significance Determination Thresholds, impacts to biological resources would be considered significant if the project would:

- *A substantial adverse impact on any Tier I Habitats, Tier II Habitats, Tier IIIA Habitats, or Tier IIIB Habitats as identified in the Biology Guidelines of the Land Development manual or other sensitive natural community identified in local or regional plans, policies or regulations, or by the CDFW or USFWS;*
- *A conflict with the provisions of an adopted Habitat Conservation Plan, Natural Conservation Community Plan, or other approved local, regional, or state habitat conservation plan, either within the MSCP plan area or in the surrounding region;*
- *Introducing land use within an area adjacent to the MHPA that would result in adverse edge effects; and,*
- *A conflict with any local policies or ordinances protecting biological resources.*

As discussed in Section 5.4.2, project implementation would include the construction of a segment of the San Diego River Park trail, which would impact 0.02 acres of Non-Native Grassland, classified as Tier IIIB Habitat by the City Land Development Code's Biology Guidelines. However, because this impact is less than 1.0 acre and is surrounded by existing urban developments, it is not considered a substantial adverse impact. There would be no substantial adverse impact on any Tier I, II, or IIIA habitats or other sensitive natural community because none occur on-site.

The project would not conflict with the provisions of an adopted Habitat Conservation Plan, Natural Conservation Community Plan, or other approved local, regional, or state habitat conservation plan, either within the MSCP plan area or in the surrounding region.

MHPA Compatible Uses and Adjacency Guidelines

The proposed project would include development adjacent to the boundaries of the MHPA and has been designed to reduce the potential direct impacts resulting from adjacency issues. MHPA Land Use Adjacency Guidelines are discussed in Section 5.1 (Land Use), and are included as Mitigation Measure LU-1 to ensure the implementation of the proposed project is consistent with the MHPA Land Use Adjacency Guidelines.

The project would include an off-site trail connecting the UT project to the existing trolley station on the adjacent Town and Country property. Access to the trail would be limited to an authorized point at the northwest boundary of the project site. The trail would be unlit and would be composed of porous material in order to prevent runoff and erosion impacts to surrounding areas. Signage to deter MHPA entrance would conform to the City of San Diego requirements for quantity, size and content and would be located along the property line. In addition, the project does not propose any signage in MHPA areas beyond the project parcel boundary. The trail would be five-feet wide, which would deviate slightly from the four-foot width directed under MSCP regulations; however, this exception was considered in order to make the proposed trail compliant with the Americans with Disabilities Act. Once built, the trail would be part of the City's regional trail system and would be maintained by the property owner.

The proposed project includes bollard-type lights, recessed stair lighting, and pole lights along the river park pathway. Low-sodium lighting is typically preferred in areas immediately adjacent to the river and similar preserves, as wildlife are less disturbed by this type of long wavelength light. However, the San Diego River Park Master Plan requires that park lighting be true color rendering (Section 4.4.4.4, Lighting and Structures). As such, the proposed project does not include the use of low-sodium lighting to be in conformance with the San Diego River Park Master Plan. MHPA adjacency guidelines as identified in Mitigation Measure LU-1 (Section 5.1 of this EIR) regarding lighting shall be implemented with the proposed project to ensure conformance during the construction process and all project lighting shall be directed away from the MHPA and shielded in order to avoid light spill into adjacent MHPA areas. Additionally, overhead lighting shall either have a fixed downward-aiming position or have a locking device to ensure fixtures remain in a downward aiming position and shielded, and shall be placed on an automatic timer and turned off from 11 pm to sunrise. Additionally, no storage of materials is proposed within the MHPA, and any necessary storage for construction, on-site business or residential uses would be done in accordance with relevant materials safety regulations.

The project has been designed with increased permeable surface area and improved stormwater treatment, which would decrease runoff flows from the site and provide water treatment prior to flows entering the river. There would be a decrease in overall runoff flow from the site (42.5 cfs to 28.1 cfs; see EIR Chapter 5.7 Hydrology). Bio-retention facilities are proposed within landscaped areas and would be accessed via storm drain infrastructure (Water Quality Technical Report, Appendices G1 and G2 of this EIR) and maintained by the project proponent. Overall these facilities treat and capture stormwater in order to reduce pollutants, increase time of concentration, and reduce the runoff volumes associated with the proposed project. In addition, the project has been designed in conformance with stormwater regulations that prevent toxic runoff as outlined in the drainage discussion above. During construction activities, standard construction BMPs would be implemented in accordance with stormwater regulations to protect against pollutants.

The project would include all brush management on-site within the parcel boundary in order to avoid brush management off-site in the MHPA and wetland/wetland buffer areas. The river lies immediately north of the project area and supports suitable habitat for the Least Bell's Vireo. Protocol surveys for this species were performed in spring/summer 2013 and results were negative. As such, no noise impacts on sensitive species would occur with project implementation.

Though the project would not result in direct impacts to habitat for the Least Bell's Vireo, it is adjacent to habitat that could support the species. Protocol surveys for this species were performed in spring/summer 2013 and were negative. The project would not impact any successional habitat adjacent to the river, and thus would not adversely impact any potential Least Bell's Vireo habitat. Re-development of the site would not introduce any new uses attractive to cowbirds; the site is already developed and is within a highly developed corridor so the project would not impact Least Bell's Vireo by introducing new uses attractive to cowbirds (e.g., horse stables, golf courses). Lastly, the project would not involve clearing of any Least Bell's Vireo habitat.

5.4.4.2 Significance of Impact

Project implementation would impact 0.02 acres of Non-Native Grassland, classified as Tier IIIB Habitat. Because this impact is less than 0.1 acre, it is not considered significant. The project would not conflict with the provisions of an

adopted Habitat Conservation Plan, Natural Conservation Community Plan, or other approved local, regional, or state habitat conservation plan, it would not create adverse edge effects to the MHPA, and it would not result in a conflict with any local policies or ordinances protecting biological resources. Therefore, there are no significant impacts for biological resources Issues 4, 5, 6, and 7. However, to ensure that the proposed project is consistent with the MSCP Land Use Adjacency Guidelines, Mitigation Measure LU-1 (identified in Section 5.1 of this EIR) shall be implemented with the proposed project.

5.4.4.3 Mitigation, Monitoring, and Reporting

Although no significant impacts are anticipated as a result of project implementation, Mitigation Measure LU-1, as identified in Section 5.1 of this EIR, shall be implemented to ensure the proposed project's consistency with the MSCP Land Use Adjacency Guidelines.

5.4.3.4 Impacts After Mitigation

Because there are no significant impacts for biological resource Issues 4, 5, 6 and 7, and therefore no associated mitigation, monitoring, or reporting measures required, there remain no impacts after mitigation. However, Mitigation Measure LU-1 was provided in order to ensure there would be no significant land use impact specifically with regard to project compliance with the MSCP.

5.4.5 Issue 8

Issue 8: Would the proposed project interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, including linkages identified in the MSCP Plan, or impede the use of native wildlife nursery sites?

5.4.5.1 Impact Analysis

According to the City of San Diego's Significance Determination Thresholds, impacts to biological resources would be considered significant if the project would:

- *Would the proposed project interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, including linkages identified in the MSCP Plan, or impede the use of native wildlife nursery sites.*

Several sensitive bird species were observed during the biological field work. Cooper's Hawk and Double-Crested Cormorant were observed and are on the CDFW Watch List. Yellow Warbler is a CDFW Species of Special Concern, and was also observed. However, these species were observed off-site and not within the proposed project impact area. Because the project site contains Eucalyptus trees, it has the potential to support nesting birds that would be protected under the Migratory Bird Treaty Act (MBTA) and/or the California Fish and Wildlife Code (§3503), under which it is unlawful to "take, possess, or needlessly destroy" avian nests or eggs. Generally, the 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. The project proposes no work within the San Diego River itself, or within the riparian corridor associated with the river.

Other than this potential impact, project implementation is not anticipated to interfere substantially with the movement of any native resident or migratory fish or wildlife species, or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites.

5.4.5.2 Significance of Impact

Potential impacts to avian nests or eggs would be considered a significant impact.

5.4.5.3 Mitigation, Monitoring, and Reporting

The proposed project has the potential to impact avian nests or eggs if vegetation clearing is undertaken during the breeding season. However, implementation of Mitigation Measure BR-1 would reduce potential impacts to nesting birds to a less than significant level:

BR-1: To avoid any direct impacts to raptors and/or any native/migratory birds, removal of habitat that supports active nests in the proposed area of disturbance should occur outside of the breeding season for these species (February 1 to September 15). If removal of habitat in the proposed area of disturbance must occur during the breeding season, the Qualified Biologist shall conduct a pre-construction survey to determine the presence or absence of nesting birds on the proposed area of disturbance. The pre-construction (precon) survey shall be conducted within 10 calendar days prior to the start of construction activities (including removal of vegetation). The applicant shall submit the results of the precon survey to City DSD for review and approval prior to initiating any construction activities. If nesting birds are detected, a letter report or mitigation plan in conformance with the City's Biology Guidelines and applicable State and Federal Law (i.e. appropriate follow up surveys, monitoring schedules, construction and noise barriers/buffers, etc.) shall be prepared and include proposed measures to be implemented to ensure that take of birds or eggs or disturbance of breeding activities is avoided. The report or mitigation plan shall be submitted to the City DSD for review and approval and implemented to the satisfaction of the City. The City's MMC Section or RE, and Biologist shall verify and approve that all measures identified in the report or mitigation plan are in place prior to and/or during construction. If nesting birds are not detected during the precon survey, no further mitigation is required.

5.4.5.4 Impacts After Mitigation

With the implementation of Mitigation Measure BR-1, potential impacts to nesting birds would be reduced to a level less than significant.

5.4.6 Conclusion

Implementation of the proposed project has the potential to result in direct impacts to nesting birds during construction. However, with the implementation of Mitigation Measure BR-1, these potential impacts would be reduced to a level less than significant. As discussed in Section 5.1 (Land Use), the proposed project has been designed in accordance with the MHPA Land Use Adjacency Guidelines. However, to ensure that implementation of the proposed project is consistent with these guidelines, Mitigation Measure LU-1 as identified in Section 5.1 of this EIR, shall be implemented with the proposed project.

5.5 Geologic Conditions

This section of the EIR discusses the potential environmental impacts of the proposed project associated with geologic conditions. Information contained in this section is summarized from the *Geologic Reconnaissance* for the Union Tribune Master Plan dated April 24, 2012, *Response to City Comments* for the Union Tribune Master Plan dated November 13, 2013, the supporting *Update Geotechnical Letter* dated September 3, 2014, prepared by Geocon Incorporated, and *Response to City Comments* for the Union Tribune Master Plan dated November 26, 2014 (Appendices E1, E2, E3 and E4, respectively of this EIR). These documents are provided on the attached CD of Technical Appendices found on the back cover of this EIR.

5.5.1 Existing Conditions

5.5.1.1 Site Topography

The project site is approximately 12.86-acres of existing development containing the headquarters of the San Diego Union Tribune, located in Mission Valley. Ground surface in the project vicinity slopes gently to the north. The topography of the project site is relatively flat and ranges from an elevation of about 28 feet (ft) above mean sea level (AMSL) to about 40 ft AMSL.

5.5.1.2 Geologic Setting

The project site is located within the western portion of the City of San Diego. The City of San Diego is located in the coastal plain environment within the southern portion of the Peninsular Ranges Geomorphic Province of Southern California. The Peninsular Ranges is a geologic and geomorphic province that extends from the Imperial Valley to the Pacific Ocean and from the Transverse Ranges to the north and Baja California to the south, which are characterized by northwest-trending fault-bounded mountain ranges and broad intervening valleys. The mountain ranges within the province represent areas that have been uplifted by deformation along the northwest-trending faults. Valleys have been deformed downward and have been filled with sedimentary deposits. The coastal plain of San Diego County is underlain by a thick sequence of relatively undisturbed and non-conformable sedimentary rocks that thicken to the west and range in age from Upper Cretaceous through the Pleistocene with intermittent deposition. The sedimentary units are deposited on bedrock Cretaceous to Jurassic age igneous and metavolcanic rocks. The coastal plain is a relatively stable block that is dissected by few faults consisting of the potentially active La Nacion Fault Zone and the active Rose Canyon Fault Zone. The Peninsular Ranges Province is also dissected by the Elsinore Fault Zone and is associated with and sub-parallel to the San Andreas Fault Zone, which is the plate boundary between the Pacific and North American Plates.

The project site is located on the western portion of the coastal plain. Marine Eocene-age sedimentary units make up the geologic sequence encountered on the site overlain by alluvial soils. The project site is located within a broad alluvial valley with an approximate width of 3,500 feet extending from Friars Road to the north and Interstate 8 to the south. The surface elevation across the width of the valley is approximately 10 to 15 feet. It has been estimated that the alluvial soils may be as thick as 90 feet with Eocene-age Stadium Conglomerate to an approximate elevation of 30 to 45 feet below current sea level. Subsequently, sea level rose to its approximate current level creating a geologic environment of alluvial deposition as much as 90 feet thick. The site is expected to be underlain by undocumented fill and alluvium extending to maximum depths of approximately 60 feet to 90 feet below existing grade, overlying the formational Stadium Conglomerate. A brief description of the geologic units is provided below.

A. Undocumented Fill

As described in the Geologic Reconnaissance report, Appendix E1 of this EIR, undocumented fill is present under structures and roads, associated with the existing development on the site. The undocumented fill is likely to consist of mixtures of silty sand and sandy silt, which would require remedial grading in areas of the project site that would receive additional fill and/or settlement sensitive improvements.

B. Alluvium

Alluvial soil exists beneath the developed areas of the project site and beneath undocumented fill on the project site. The alluvium is expected to consist of medium dense and firm, silty, fine to coarse sand and soft silt and to possess a thickness of 60 to 90 feet. The alluvium is subject to settlement and is not suitable for the support of settlement sensitive structures without mitigation. Gravel, cobble and boulder basal unit are expected to be at the bottom of the alluvium, which may present challenges to the construction of deep foundation systems.

C. Stadium Conglomerate

The Stadium Conglomerate is expected to underlie the alluvium at a depth of 60 to 90 feet below existing grade and to consist of dense, locally cemented, gravelly and cobbly, fine to medium sand and sandy gravel. The Stadium Conglomerate is adequate to support the proposed project.

5.5.1.3 Geologic Hazards

Geologic hazards are those that may pose serious problems when land is developed and include unstable slopes, slide prone areas, underlying and nearby active faults, and liquefiable soils. The City of San Diego Seismic Safety Study, Geologic Hazards and Faults, Map Sheet 21 defines the project site with a Hazard Category 31: *Liquefaction, High Potential – Shallow groundwater, major drainages, hydraulic fills.*

A. Faulting and Seismicity

A review of geologic literature and geologic conditions in the project vicinity indicated no known active, potentially active or inactive faults are located at the project site. Active faults are defined by the State of California as faults demonstrating evidence of activity, such as surface rupture, within the last 11,000 years. The project site is not located within a State of California Earthquake Fault Zone.

There are six known active faults located within 50-mile radius of the project site. The nearest known active faults are the Newport-Inglewood/Rose Canyon Fault system, located approximately two miles west of the site, which is the dominant source of potential ground motion. Earthquakes that might occur on the Rose Canyon Fault Zone or other faults within the southern California and northern Baja California area are potential generators of moderate to severe ground motion at the project site. The estimated deterministic maximum earthquake magnitude and peak ground acceleration for the Newport-Inglewood Fault are 7.5 and 0.36g, respectively. The estimated deterministic maximum earthquake magnitude and peak ground acceleration for the Rose Canyon Fault are 6.9 and 0.35 g, respectively. Table 5.5-1 lists the estimated maximum earthquake magnitude and peak ground acceleration for the most dominate faults in relationship to the project site.

Table 5.5-1
Deterministic Maximum Earthquake Magnitude and Peak Ground Acceleration within the Region

Fault Name	Distance from Site (miles)	Maximum Earthquake Magnitude	Peak Ground Acceleration		
			Boore Atkinson 2008 (g)	Campbell Bozorgnia 2008 (g)	Chiou-Younges 2008 (g)
Newport-Inglewood	2	7.5	0.36	0.22	0.28
Rose Canyon	2	6.9	0.35	0.22	0.27
Coronado Bank	14	7.4	0.26	0.14	0.19
Palos Verdes Connected	14	7.7	0.28	0.15	0.20
Elsinore	40	7.9	0.22	0.10	0.13
Earthquake Valley	45	6.8	0.15	0.07	0.07

Source: GEOCON, 2012.

The calculated probabilistic seismic hazard peak ground acceleration defined as having a two percent probability of exceedance in 50 years ranges from 0.31 g to 0.64 g (Table 5.5-2). The range of peak ground acceleration rates is based on three acceleration-attenuation relationships suggested by Boore-Atkinson (2008) NGA USGS 2008 (0.64g), Campbell-Borzorgnia (2008) NGA USGS 2008 (0.31g) and Chiou-Youngs (2008) NGA USGS 2008 (0.36g). The Geological Reconnaissance report recommends a site specific ground motion analysis in accordance with the requirements of American Society of Civil Engineers (ASCE) 7-10, be performed at the site.

Table 5.5-2
Probabilistic Seismic Hazard Parameters

Probability of Exceedance	Peak Ground Acceleration		
	Boore Atkinson 2008 (g)	Campbell Bozorgnia 2008 (g)	Chiou-Younges 2008 (g)
2% in a 50 Year Period	0.64	0.31	0.36
5% in a 50 Year Period	0.349	0.25	0.29
10% in a 50 Year Period	0.39	0.20	0.23

Source: GEOCON, 2012

B. Ground Surface Rupture

Ground rupture is characterized by slippage along the fault, sufficient to cause a gap or surface soil rupture where the upper edge of the fault zone intersects that earth surface, resulting from displacement in the underlying bedrock. Such displacement may be in any direction and can range from a fraction of an inch to tens of feet.

A review of geologic literature and geologic conditions in the project vicinity indicated no known active, potentially active or inactive faults are located at the project site. In addition, active, potentially active and other major inactive faults noted on regional geologic and fault maps do not cross nor trend toward the project site. The project site is not located within a State of California Earthquake Fault Zone as designated by the CGS. The site is not located within any fault zone identified on the San Diego Seismic Safety Study, Geologic Hazards and Fault maps and the closest active fault is the Rose Canyon Fault located approximately two miles to the west. Therefore, the possibility of any hazard due to ground surface rupture at the site is considered very low.

C. Liquefaction

The San Diego Seismic Safety Study, Geologic Hazards and Fault maps show the project to be located within a liquefaction susceptibility area, Hazard Category 31 (Liquefaction High Potential, shallow ground water, major drainages, hydraulic fills). Liquefaction typically occurs when a site is located in a zone with seismic activity, on-site soils are cohesionless/silt or clay with low plasticity, groundwater is encountered within 50 feet of the surface, and soil relative densities are less than about 70 percent. If these four criteria are met, a seismic event could result in a rapid pore-water pressure increase from the earthquake generated ground accelerations. The potential for liquefaction occurring within the site soil exists due to the relatively low density of the alluvial deposits. Adverse impacts typically associated with liquefaction include lateral spreading, ground rupture and/or sand boils, ground failure, and settlement of the liquefiable layers.

Seismically Induced Settlement

Seismically induced settlement is settlement that may occur whether the potential for liquefaction exists or not. The potential for seismically induced settlement occurring within the site soil exists due to the relatively low density of the alluvial deposits. Seismically induced settlement could occur within the liquefied soil layer and/or layers after seismic shaking stops due to rearrangement of the sand particles. It is expected that settlement of up to several inches is likely within the underlying alluvium.

Liquefaction Induced Lateral Spread

Lateral spreading involves movement of earth materials and typically occurs when liquefiable soil is in the immediate vicinity of a free face, such as a slope. Factors controlling lateral spread include earthquake magnitude, distance from the epicenter, thickness of liquefiable soil layer, grain size characteristics, fine contents of the soil, and SPT blow counts. Additional analysis should be performed to evaluate if the potential of lateral spreading in the liquefiable soils below the groundwater table is considered an adverse impact to the proposed project since the topography of the site is relatively flat.

Flow Slide

Flow slide is a phenomenon in which a soil mass moves over a relatively long distance in a fluid-like manner, occurring rapidly on flat slopes in loose, saturated, uniform sands, or in highly sensitive clays (Geotechnical Info.com. 2013). Due to the relatively low density of the alluvial soils, the potential for flow slide occurring on the project site exists.

D. Soils

Expansive soils are characterized by their ability to undergo significant volume changes (shrink or swell) due to variations in moisture content (USGS). Shrinking or swelling of foundation soils can lead to damage to foundations and engineered structures, including tilting and cracking. Based on the Geological Reconnaissance report prepared by GEOCON (Appendix E1 of this EIR), the project site is expected to consist of undocumented fill (silty sand to sandy silt) and alluvial deposits (medium dense and firm, silty, fine to coarse sand and soft silt) underlain by Stadium conglomerate bedrock). The specific soil types underlaying the project site include Made Land (Md); Tujunga sand, 0 to 5 percent slopes; and Riverwash (Rm). The existing onsite soils can be considered to be both “non-expansive” and “expansive” as defined by 2013 CBC Code Section 1803.5.3. Table 5.5-3 below presents soil classifications based on the expansion index.

Table 5.5-3
Expansion Classification Based on Expansion Index

Expansion Index	Expansion Classification	2013 CBC Classification
0-20	Very Low	Non-Expansive
21-50	Low	Expansive
51-90	Medium	
91-130	High	
Greater Than 130	Very High	

Source: Latitude 33, 2012.

E. Tsunamis and Seiches

A tsunami is a series of large sea waves generated in the ocean by a sudden displacement of large volumes of water. Causes of tsunamis include underwater earthquakes, volcanic eruptions, or offshore landslides. Historically, tsunami wave heights have ranged up to 3.7 feet in the San Diego area. The project site is not located within a high risk for tsunami hazard zone, as indicated on the County of San Diego Hazard Mitigation Plan. The project site is located about five miles from the Pacific Ocean at a minimum elevation of approximately 28 feet AMSL. Therefore, the risk of tsunamis affecting the site is negligible.

A seiche is an earthquake or landslide induced wave in a confined body of water, such as a lake, reservoir, or bay. Resulting oscillations could cause waves up to tens of feet high, which in turn could cause extensive damage along the shoreline. The project site is located downstream from five dammed bodies of water; however, all of the structural dams are maintained and regulated by the City of San Diego and the proposed project is not expected to impact any of the dam retention basins. Additionally, the proposed project is not located near any lake or bay; therefore, the risk of seiches affecting the site is negligible.

F. Landslides

The term "landslide" describes a wide variety of processes that result in the downward and outward movement of slope-forming materials including rock, soil, artificial fill, or a combination of these. The materials may move by falling, toppling, sliding, spreading, or flowing. A review of geologic literature and geologic conditions in the project vicinity, and the relatively level topography of the of the project site, indicate landslides are not present at the project site or at a location that could impact the project site.

5.5.1.4. Ground Water

In a previously conducted engineering study for the project site, ground water was encountered at depths ranging from approximately nine to twelve feet below existing grade. Groundwater elevations are dependent on seasonal precipitation, irrigation, and land use among other factors, and vary as a result. Proper surface drainage is an important factor in the future performance of the proposed project. As a result, groundwater is considered to be a hazard to development on the site.

5.5.2 Issue 1

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

5.5.2.1 Impact Analysis

According to the City of San Diego's Significance Determination Thresholds, impacts to geologic conditions would be considered significant if the project would:

- *Expose people or structures to geologic hazards such as earthquakes, landslides, mudslides, ground failure, or similar hazards.*

A. Faulting, Seismicity and Ground Surface Rupture

A review of geologic literature and geologic conditions in the project vicinity indicated no known active, potentially active or inactive faults are located at the project site. In addition, active, potentially active and other major inactive faults noted on regional geologic and fault maps do not cross nor trend toward the project site. The project site is not located within a State of California Earthquake Fault Zone as designated by the CGS. The site is not located within any fault zone identified on the San Diego Seismic Safety Study, Geologic Hazards and Fault maps. The closest active fault is the Rose Canyon Fault located approximately two miles to the west. Therefore, the possibility of any hazard due to ground surface rupture at the site is considered very low.

The project site would likely be exposed to moderate to severe ground motion because the site is located in a seismically active area. The severity of ground shaking would be dependent on several factors, including distance to the epicenter and magnitude of the seismic event. However, as required by the City of San Diego Municipal Code (SDMC) and the California Building Code (CBC), standard engineering practices, which include design criteria for seismic loading and other geologic hazards, would be incorporated into the design and construction of the proposed development. Seismic design features incorporated into the building plans in accordance with the CBC, would reduce potential impacts to people or structures including the risk of life or injury due to local seismic events to an acceptable level of risk. Therefore, the impacts associated with strong ground motion would be less than significant.

B. Soil Liquefaction

Liquefaction typically occurs when a site is located in a zone with seismic activity, on-site soils are cohesionless/silt or clay with low plasticity, groundwater is encountered within 50 feet of the surface, and soil relative densities are less than about 70 percent. If the four previous criteria are met, a seismic event could result in a rapid pore-water pressure increase from the earthquake-generated ground accelerations. Seismically induced settlement is settlement that may occur whether the potential for liquefaction exists or not. The potential for liquefaction and seismically induced settlement occurring within the site soil exists due to the relatively low density of the alluvial deposits. Section 5.5.4 discusses the potential impacts to the property due to liquefaction.

C. Soils

As discussed above, the project site is expected to consist of undocumented fill (silty sand to sandy silt) and alluvial deposits (medium dense and firm, silty, fine to coarse sand and soft silt) underlain by Stadium conglomerate bedrock. Further, the project site is underlain specifically by soil types Md, TuB, and Rm. The existing soils onsite can be considered to be both “non-expansive” and “expansive” as defined by 2013 CBC Code Section 1803.5.3. However, the onsite soil possess a “very low” to “low” expansion potential (expansion index of 50 or less). Therefore, the impacts associated with expansive soils would be less than significant.

D. Tsunamis and Seiches

The project site is not located within a high-risk tsunami hazard zone, as indicated on the County of San Diego Hazard Mitigation Plan and is located approximately five miles inland from the Pacific Ocean. Therefore, the likelihood of a tsunami hazard is negligible. Similarly the project site is not located down stream of any large bodies of water that could result in adverse effects in the event of a seiche. The potential for the proposed project to expose people or structures to seiches would be very low. Therefore, impacts to people or structures, including the risk of injury or death related to tsunami or seiche would be less than significant with the implementation of the proposed project.

E. Groundwater

Groundwater is expected at a depth of approximately nine to twelve feet below existing grade. The proposed excavations for the subterranean parking level are expected to extend approximately 10 to 15 feet below ground floor elevation. A comprehensive geotechnical investigation that would be prepared for the proposed project, as required by the SDMC, would include recommendations for groundwater. Recommendations for potential groundwater impacts may include stabilization and/or dewatering for excavation that extend below the groundwater table. Implementation of Mitigation Measure GC-1 would ensure the potential impacts associated with groundwater are adequately addressed during the final design process. Implementation of Mitigation Measure GC-1 would reduce the proposed project’s impact to groundwater to less than significant.

5.5.2.2 Significance of Impact

A. Faulting, Seismicity and Ground Surface Rupture

The site is not located within any fault zone identified on the San Diego Seismic Safety Study, Geologic Hazards and Fault maps. Additionally, SDMC and the California Building Code (CBC) requires that standard engineering practices, which include design criteria for seismic loading and other geologic hazards, would be incorporated into the design and construction of the proposed development. Therefore, compliance with the SDMC and CBC requirements would ensure that impacts associated with faulting, seismicity and ground surface rupture would be less than significant.

B. Soil Liquefaction

The potential for liquefaction and seismically induced settlement occurring within the site soil exists due to the relatively low density of the alluvial deposits. Section 5.5.4 discusses the potential impacts to the property due to liquefaction.

C. Soils

The proposed project would utilize existing onsite soils that possess “very low” to “low” expansion potential. Therefore, impacts associated with soil expansion would be less than significant.

D. Tsunamis and Seiches

The potential for the proposed project to expose people or structures to tsunami or seiche would be very low, as the project site is located approximately five miles from the Pacific Ocean and is not down stream of any large bodies of water. Therefore, impacts associated with tsunami and seiche would be less than significant.

E. Groundwater

Implementation of Mitigation Measure GC-1 would ensure that potential impacts associated with groundwater are adequately addressed during the final design process. Therefore, impacts to groundwater would be less than significant.

5.5.2.3 Mitigation, Monitoring, and Reporting

The proposed project has the potential to expose people and property to the geologic hazards discussed above. However, potential impacts would be reduced to a less than significant level through implementation of the following mitigation measure as recommended by the project’s geotechnical consultant:

GC-1 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 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.

5.5.2.4 Impacts After Mitigation

Implementation of Mitigation Measure GC-1 includes geotechnical recommendations addressing potential issues associated with ground motion, liquefaction, lateral spread, flow slide, and seismically induced settlements. The implementation of Mitigation Measure GC-1 and any geotechnical recommendations identified in the comprehensive geotechnical investigation would not result in any direct or indirect impacts because any additional recommendations would be incorporated into the final building and grading plans for the project, which are approved by the City prior to construction. Implementation of these mitigation measures would reduce impacts associated with potential geologic hazards to an acceptable level of risk.

5.5.3 Issue 2

Issue 2: Would the proposed project result in a substantial increase in wind or water erosion of soils, either on or off the site?

5.5.3.1 Impact Analysis

According to the City of San Diego's Significance Determination Thresholds, impacts to geologic conditions would be considered significant if the project would:

- *Result in a substantial increase in wind or water erosion of soils, either on or off the site.*

Construction of the proposed project would involve grading activities, which would expose and disturb soils and could therefore increase the potential for soil erosion on the site. However, potential erosion impacts during construction would be avoided with adherence to the erosion control standards established by the City of San Diego's grading ordinance. As discussed in Section 5.11 of this EIR, surface water runoff and sedimentation would be controlled with the preparation and implementation of a Strom Water Pollution Prevention Plan (SWPPP) and Best Management Practices (BMPs). After construction, the project site would include operational BMPs in accordance with the City of San Diego MS4 permit that would limit any wind or water erosion of soils during operations. Therefore, the proposed project would result in less than significant impacts resulting from a substantial increase in wind or water erosion of soils.

5.5.3.2 Significance of Impact

The proposed project includes preparation and implementation of a SWPPP and BMPs. Therefore, with implementation of the SWPPP and BMPs less than significant impacts associated with wind or water erosion of soils would occur and no mitigation measures are required.

5.5.3.3 Mitigation, Monitoring, and Reporting

Implementation of the proposed project would not result in any significant impacts associated with wind or water erosion. Therefore, no mitigation measures are required.

5.5.3.4 Impacts After Mitigation

No mitigation measures are required; therefore, there would be no impacts after mitigation.

5.5.4 Issue 3

Issue 3: Would the proposed project be located on a geologic unit or soil that is unstable or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction or collapse?

5.5.4.1 Impact Analysis

According to the City of San Diego's Significance Determination Thresholds, impacts to geologic conditions would be considered significant if the project would:

- *Be located on a geologic unit or soil that is unstable or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction or collapse.*

A. Seismically Induced Landslide

The topography of the project site is relatively flat, and the site is not located within a designated area of previous occurrence of landslide movement. There are no known landslides near or at the site, nor is the site in the path of any known or potential landslides. Therefore, impacts due to landslides would be less than significant.

B. Liquefaction, Lateral Spread and Flow Slide

The San Diego Seismic Safety Study, Geologic Hazards and Fault maps show the project to be located within a liquefaction susceptibility area identified for the region (Hazard Category 31). The potential for liquefaction at the site is considered high. Currently, three lots are planned on the property. The northern lot (Lot 3) consists of the planned parking structure, residential structures, and townhomes; the central lot (Lot 2) consists of the existing structures; and the southern lot (Lot 1) consists of the existing structures and the conversion of 3,000 square feet of office space to retail amenity space. Based on the layout of the planned structures, the liquefaction mitigation can occur independently on the three lots. The structures on Lot 1 and on Lot 3 would be supported by a deep foundation system that would include a design to mitigate liquefaction distress. The improvements on Lot 3 would possess a soil modification system, such as stone columns, or deep foundations to mitigate the distress due to liquefaction.

Additionally, given the low density of the on-site alluvial soils the potential for other geologic stability hazards such as lateral spread and flow slide exist. Liquefaction induced lateral spreading may be a potential impact on the northern portion of the property. However, the planned structures and improvements on the northern portion of the property would be designed to help prevent distress if lateral spreading were to occur. Soil modification techniques, including stone columns, soil mixing, and compaction grouting would be installed to help mitigate lateral spreading. Furthermore, the northern portion of the property adjacent to the San Diego River could possess flow slide potential. However, based on the relatively flat topography of the project site and surrounding area, it is unlikely that flow slide poses a significant impact to the property. Potential impacts associated with flow slide would be mitigated with the construction of retaining walls or the installation of stone columns during construction of the proposed project.

According to the Geological Reconnaissance report prepared by Geocon (Appendix E1 of this EIR), the construction of the proposed multiple use development is feasible from a geotechnical perspective. It is not expected that the installation of the recommendations described above would result in significant impacts to the subject and adjacent properties. In addition, as described in Mitigation Measure GC-1, the geotechnical recommendations to be identified in the final comprehensive geotechnical investigation would be incorporated into the final design of the project and implemented during construction to help prevent distress to the existing and proposed structures. Therefore, the implementation of Mitigation Measure GC-1 would reduce the potential impacts of the proposed project to people or structures, including the risk of injury or death due to liquefaction, lateral spread and flow slide to a level less than significant.

C. Seismically Induced Settlement

The potential for seismically induced settlement occurring at the project site exists due to the relatively low density of the alluvial soils at the project site. The future geotechnical investigation required by the SDMC would provide recommendations to help prevent potential impacts from seismically induced settlement, including partial remedial grading and deep foundations with structural slabs. The underlying Stadium Conglomerate is considered suitable for the support of structural loads. Implementation of Mitigation Measure GC-1 would reduce the potential impacts to people or structures, including the risk of injury or death due to seismically induced settlement to a level less than significant.

5.5.4.2 Significance of Impact

A. Seismically Induced Landslide

The proposed project is not located at, or in the vicinity of, any known landslides, nor is it in the path of any known or potential landslides. Therefore, there would be less than significant impacts associated with seismically induced landslides.

B. Liquefaction, Lateral Spread and Flow Slide

The proposed project site is located in an area with high susceptibility to liquefaction. Additionally, the potential for other geologic stability hazards such as lateral spread and flow slide exist at the project site due to the low density of on-site alluvial soils. However, implementation of Mitigation Measure GC-1 would reduce impacts to people or structures, including the risk of life, injury, or death due to liquefaction, lateral spread and flow slide to a level less than significant.

C. Seismically Induced Settlement

The potential for seismically induced settlement occurring at the project site exists due to the relatively low density of the alluvial soils at the project site. However, implementation of Mitigation Measure GC-1 would reduce the potential impacts to people or structures, including the risk of life, injury, or death due to seismically induced settlement to a level less than significant.

5.5.4.3 Mitigation, Monitoring, and Reporting

Potential impacts associated with liquefaction, lateral spread, flow slide, and seismically induced settlement to the proposed project would be mitigated with implementation of Mitigation Measure GC-1, described above in Section 5.5.2.3.

5.5.4.4 Impacts After Mitigation

Implementation of Mitigation Measure GC-1 includes geotechnical recommendations addressing potential issues associated with ground motion, liquefaction, lateral spread, flow slide, and seismically induced settlements. It is not expected that the installation of the recommendations described above in Section 5.5.2.3 would result in significant impacts to the subject and adjacent properties. Therefore, impacts associated with these issues would be reduced to a less than significant level.

5.5.5 Conclusions

Based on the results of the Geologic Reconnaissance report and supplemental documents, the construction of the proposed project on the site is feasible from a geotechnical standpoint. A significant impact has been identified related to the potential for strong seismic shaking, liquefaction, lateral spread, flow slide, and seismically induced settlement. A significant impact has also been identified due to the presence of ground water. However, with the implementation of Mitigation Measure GC-1, and compliance with the requirements of the CBC and SDMC, these impacts would be reduced to a level less than significant.

5.6 Historical Resources

The information and analysis in the following discussion regarding historical resources has been compiled based on the City of San Diego's NOP archeological sensitivity determination, historical resources' thresholds, and recommended mitigation measures (MM). Additional research was extracted from the City of San Diego Mission Valley Community Plan (1985).

According to the City of San Diego Significance Determination Thresholds, impacts to historical resources would occur if the proposed project would impact a resource that meets the definitions contained in Chapter 11, Article 3, Division 1 of the Code and may differ from the definition of historical resources in these Guidelines and from a determination of significance under CEQA.

5.6.1 Existing Conditions

The proposed project site is fully developed and is surrounded by fully developed parcels, except for the adjacent San Diego River. The existing structures on the proposed project site were constructed in 1972, and the proposed project site does not contain any known historic resources. However, other developments within the vicinity have discovered historic resources of archaeological significance, most likely due to the project's location being near the historical fresh water source, the San Diego River.

5.6.1.1 Regional Prehistory and History

Archaeological investigations along the southern California coast have indicated that there was a diverse range of human occupation extending from the early Holocene into the Ethnohistoric period. It is most widely accepted that humans first entered North America between 15,000 and 12,000 before present (B.P.). The Paleo-Indian Period extends from 12,000-7,500 B.P. and is noted for its distinctive tool kit characterized by fluted points. The Archaic Period is considered to have extended from approximately 8,500 B.P. until 1,300 B.P. This time period is differentiated from the Paleo-Indian cultural complex based on a later focus on activities that emphasized marine mollusks, fish, and plant resources. The onset of the Late Prehistoric period in San Diego County is generally considered to have occurred between 1,300 B.P. and 800 B.P. In general, the Late Prehistoric period is characterized by the appearance of small, pressure flaked projectile points indicative of bow and arrow technology, the appearance of ceramics, the replacement of flexed inhumations with cremations, and an emphasis on inland plant food collection and processing.

The River Valley was first settled nearly 10,000 years ago. The earliest occupants of the valley changed the River little. The riparian zone provided habitat for food sources and vegetation from which dwellings, clothing, and baskets were made. The valley also served as a transportation corridor between the uplands and the ocean. Known as part of the Archaic Period (La Jolla Complex), these people used the coast and the marshes of the River extensively as hunting grounds and as sources for materials for shelter, tools, and clothing. During the Late Prehistoric (Kumeyaay) Period, from circa 2,000 years ago to the Spanish era, at least three villages (rancherias) existed along the River in what is now the City of San Diego, along with outlying camps and special use areas.

With the arrival of the Spanish in the late eighteenth century, pressure on the valley landscape began to increase. The first mission and presidio were built on a hillside above the Kumeyaay village of *Cosoy*/*Kosaii*/*Kosa'aay* near Old Town, an area still known as Presidio Hill. The Mission was relocated near *Nipaguay* shortly thereafter in 1774, where

it remains today as the San Diego Mission de Alcalá. The expanding mission and conversion of Kumeyaay people to Christianity led to increasing population in the valley. The Spanish introduced agriculture and cattle to the valley and built the first dam above the gorge by 1815. A Mission period flume was constructed shortly thereafter to bring water from the dam to the Mission, as means to provide water to an increasing population and to water livestock, field crops, and orchards. This was San Diego's first water conveyance system. To support the burgeoning population of both immigrating Spaniards and Natives converted to Christianity, improvements to the efficiency of agricultural production and obtaining an adequate and reliable water supply were necessary. So additional water ditches (*zanjas*) were built in what is known today as Grantville and to supply Old Town during this period.

The Spanish ceded few land grants to Natives or civilians during this period, but that all changed when Mexico gained control of Alta California in 1821. Numerous and large land grants were granted to former soldiers, Natives, and other civilians during this period. Along the entire Master Plan Study Area the lands remained under control of the Mission San Diego de Alcalá. When the missions were secularized in 1834, the land and holdings of the Mission quickly went into ruin and through a succession of land owners. The final blow came in 1845 when the mission lands were granted to Santiago Arguello, "in consideration of past services to the territorial government."

The American era started as early 1846 as an outgrowth of hostilities with Mexico. California became an official territory of the United States in 1848 when the Treaty of Guadalupe Hidalgo was signed, formally ending the hostilities of the Mexican-American War. The ensuing Gold Rush brought tens of thousands to California, in sufficient numbers to gain statehood in 1850. Shortly thereafter the City and County of San Diego were established, and change began to occur more rapidly. At the west end of the valley the Derby Dike was constructed by the Army Corps of Engineers, effectively isolating the San Diego River from half of its natural delta and estuary to San Diego Bay, and diverting the flow permanently to False Bay, now known as Mission Bay. Population of the valley began to grow significantly and along with it the demand for a reliable water supply. By the end of the nineteenth century numerous dams had been constructed throughout San Diego County, including the El Capitan and San Vicente on the River. These dams isolated the lower San Diego River watershed from its headwaters and upper reaches, drastically changing the hydrologic pattern of the River and its seasonally diverse flows. The sand and gravel industry developed within the valley to meet the demand for the construction of roads, dams, jetties, and railroads. Throughout almost 100 years of American control, Mission Valley remained an area primarily devoted to agriculture and dairy farming.

The founder of modern San Diego was Alonzo Erastus Horton, who arrived in San Diego in 1867. During the 1870's the telephone, telegraph, and electricity arrived in San Diego and the water supply was improved. Throughout the 1880's San Diego experienced a massive real estate boom and expanded physically as a result of the improvements to the regional highway network in the 1950's. The first major urban development was the Mission Valley Shopping Center and Hotel Circle became an important commercial-recreation and visitor-oriented area (City, 1985). This development was soon followed with Jack Murphy Stadium, which was completed in 1967 (City, 1985). Overtime, the area was filled in with multiple dwelling unit neighborhoods. However, the San Diego River has been the primary attraction, first as a source of fresh water and later as a scenic recreational asset.

5.6.1.1 Archaeological Resources

As mentioned above, the proposed project site does not contain any known archaeological resources; however, archaeological resources have been identified in the area surrounding the area. Therefore, there is the potential for archaeological resources to be present on the project site.

5.6.1.2 Historical Resources

The proposed project would not involve the demolition of any existing structures on the proposed project site. Additionally, the existing buildings are not of historical significance.

5.6.2 Issue 1

Issue 1: Would the proposed project result in any impact to existing religious or sacred uses within the potential impact area?

5.6.2.1 Impact Analysis

According to the City of San Diego's Significance Determination Thresholds, impacts to historical resources would be considered significant if the project would:

- *Result in any impact to existing religious or sacred uses within the potential impact area.*

As described in Section 3.0 of this EIR, the proposed project site is currently used for the Union Tribune headquarters, printing facility, and parking. The proposed project site does not contain any evidence of religious or sacred uses on-site or in the nearby vicinity; therefore, the proposed project would not expect to cause any impacts to religious or sacred uses.

5.6.2.2 Significance of Impact

The proposed project is not expected to result in any impacts to existing religious or sacred uses; therefore, no impact for this issue area has been identified.

5.6.2.3 Mitigation, Monitoring, and Reporting

No mitigation measures would be required.

5.6.2.4 Impacts After Mitigation

No impact to religious or sacred uses have been identified that would be impacted as a result of the proposed project.

5.6.3 Issue 2

Issue 2: Would the proposed project result in the disturbance of any human remains, including those interred outside of formal cemeteries?

5.6.3.1 Impact Analysis

According to the City of San Diego's Significance Determination Thresholds, impacts to historical resources would be considered significant if the project would:

- *Result in the disturbance of any human remains, including those interred outside of formal cemeteries.*

The project site is fully developed. Based on the history of the site, the proposed project site is not expected to contain any existing human remains, including those interred outside of formal cemeteries due to its existing developed use.

5.6.3.2 Significance of Impact

The proposed project is not expected to result in any impacts or disturbance of human remains; therefore, no impact for this issue area has been identified.

5.6.3.3 Mitigation, Monitoring, and Reporting

No mitigation measures would be required.

5.6.3.4 Impacts After Mitigation

No impact to human remains would be expected as a result of implementation of the proposed project.

5.6.4 Issue 3

Issue 3: Would the proposed project result in an alteration, including the adverse physical or aesthetic effects and/or the destruction of a prehistoric or historic building (including an architecturally significant building), structure or object or site?

5.6.4.1 Impact Analysis

According to the City of San Diego's Significance Determination Thresholds, impacts to historical resources would be considered significant if the project would:

- *Result in an alteration, including the adverse physical or aesthetic effects and/or the destruction of a prehistoric or historic building (including an architecturally significant building), structure or object or site.*

The purpose and intent of the Historical Resources Regulations of the Land Development Code (Chapter 14, Division 3, and Article 2) is to protect, preserve and, where damaged restore the historical resources of San Diego. The regulations apply to all proposed development within the City of San Diego when historical resources are present on the premises. CEQA requires that before approving discretionary projects the Lead Agency must identify and examine the significant adverse environmental effects, which may result from that project. A project that may cause a substantial adverse change in the significance of a historical resource may have a significant effect on the environment (Sections 15064.5(b) and 21084.1). A substantial adverse change is defined as demolition, destruction, relocation, or alteration activities, which would impair historical significance (Sections 15064.5(b)(1). Any historical resource listed in or eligible to be listed in the California Register of Historical Resources, including archaeological resources, is considered to be historically or culturally significant.

The City of San Diego criteria for determination of historic significance, pursuant to the CEQA, is evaluated based upon age (over 45 years), location, context, association with an important event, uniqueness, or structural integrity of the building. In addition, projects requiring the demolition of structures that are 45 years or older are also reviewed for historic significance in compliance with CEQA. CEQA Section 21084.1 states that "A project that may cause a substantial adverse change in the significance of a historical resource is a project that may cause a significant effect on the environment."

None of the structures on the property are over 45 years old, and therefore, no potentially significant structures are present on the property.

According to the City's Historical Resources Sensitivity Maps the project area is located within an area identified as having a high sensitivity level for archaeological resources. A record search of the California Historic Resources Information System (CHRIS) digital database was reviewed to determine the presence or absence of potential resources within the project site. No recorded sites were identified within the project boundaries but several previously recorded historic and prehistoric sites have been identified in the project vicinity. However, given the fact that many archaeological sites have been found throughout the river valley it could be that these resources have been buried through alluvial deposition.

Based on this information, there is a potential for buried cultural resources to be impacted through implementation of the project. Furthermore, given the alluvial setting as mentioned above, it is possible that cultural material related to human habitation may have been buried by the alluvial cover and therefore there may be buried historical resources without visible surface elements. Therefore, there is the potential for ground-disturbing activities to result in impacts to unknown historical resources (archaeology).

5.6.4.2 Significance of Impact

A potentially significant impact to archaeological resources has been identified with the implementation of the proposed project. However, with the implementation of Mitigation Measure HR-1 this impact would be reduced to a level less than significant.

5.6.4.3 Mitigation, Monitoring, and Reporting

The following Mitigation Measure is intended to avoid any potential adverse impacts to historical resources during construction:

HR-1 I. Prior to Permit Issuance

A. Entitlements Plan Check

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.

B. Letters of Qualification have been submitted to ADD

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 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.
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.
3. Prior to the start of work, the applicant must obtain approval from MMC for any personnel changes associated with the monitoring program.

II. Prior to Start of Construction

A. Verification of Records Search

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.
2. The letter shall introduce any pertinent information concerning expectations and probabilities of discovery during trenching and/or grading activities.
3. The PI may submit a detailed letter to MMC requesting a reduction to the ¼ mile radius.

B. PI Shall Attend Precon Meetings

1. Prior to beginning any work that requires monitoring; the Applicant shall arrange a Precon Meeting that shall include the PI, 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.
   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.
2. Identify Areas to be Monitored
   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.
   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).
3. When Monitoring Will Occur

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.

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.

III. During Construction

A. Monitor(s) Shall be Present During Grading/Excavation/Trenching

1. The Archaeological Monitor shall be present full-time 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. **The Construction Manager is responsible for notifying the RE, PI, and MMC of changes to any construction activities.**

2. The monitor shall document field activity via the Consultant Site Visit Record (CSVR). The CSVR's 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.

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 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.

B. Discovery Notification Process

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.

2. The Monitor shall immediately notify the PI (unless Monitor is the PI) of the discovery.

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.

C. Determination of Significance

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.

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.

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 before ground-disturbing activities in the area of discovery will be allowed to resume.

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.

IV. Discovery of Human Remains

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:

A. Notification

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).
2. The PI shall notify the Medical Examiner after consultation with the RE, either in person or via telephone.

B. Isolate discovery site

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.
2. The Medical Examiner, in consultation with the PI, will determine the need for a field examination to determine the provenience.
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.

C. If Human Remains **ARE** determined to be Native American

1. The Medical Examiner will notify the Native American Heritage Commission (NAHC) within 24 hours. By law, **ONLY** the Medical Examiner can make this call.
2. NAHC will immediately identify the person or persons determined to be the Most Likely Descendent (MLD) and provide contact information.
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 & Safety Codes.
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.
5. Disposition of Native American Human Remains shall be determined between the MLD and the PI, IF:

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;

b. The landowner or authorized 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.

c. In order to protect these sites, the Landowner shall do one or more of the following:

(1) Record the site with the NAHC;

(2) Record an open space or conservation easement on the site;

(3) Record a document with the County.

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.

D. If Human Remains are **NOT** Native American

1. The PI shall contact the Medical Examiner and notify them of the historic era context of the burial.

2. The Medical Examiner will determine the appropriate course of action with the PI and City staff (PRC 5097.98).

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.

V. Night and/or Weekend Work

A. If night and/or weekend work is included in the contract

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.

2. The following procedures shall be followed.

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 CSVR and submit to MMC via fax by 8AM of the next business day.

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.

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.

d. The PI shall immediately contact MMC, or 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.

B. If night and/or weekend work becomes necessary during the course of construction

1. The Construction Manager shall notify the RE, or BI, as appropriate, a minimum of 24 hours before the work is to begin.

2. The RE, or BI, as appropriate, shall notify MMC immediately.

C. All other procedures described above shall apply, as appropriate.

VI. Post Construction

A. Preparation and Submittal of Draft Monitoring Report

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,

a. For significant archaeological resources encountered during monitoring, the Archaeological Data Recovery Program shall be included in the Draft Monitoring Report.

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 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.

2. MMC shall return the Draft Monitoring Report to the PI for revision or, for preparation of the Final Report.

3. The PI shall submit revised Draft Monitoring Report to MMC for approval.

4. MMC shall provide written verification to the PI of the approved report.

5. MMC shall notify the RE or BI, as appropriate, of receipt of all Draft Monitoring Report submittals and approvals.

B. Handling of Artifacts

1. The PI shall be responsible for ensuring that all cultural remains collected are cleaned and catalogued

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.

3. The cost for curation is the responsibility of the property owner.

C. Curation of artifacts: Accession Agreement and Acceptance Verification

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 Native American representative, as applicable.
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.

D. Final Monitoring Report(s)

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.
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.

5.6.4.4 Impacts After Mitigation

With implementation of Mitigation Measure HR-1 during construction, the proposed project would result in less than significant impacts to historical resources.

5.6.5 Conclusions

There is a potential for buried archaeological resources to be encountered during grading activities associated with the construction of the proposed project. Therefore, a potentially significant impact to archaeological resources has been identified the implementation of the proposed project. However, with the implementation of Mitigation Measure HR-1, which would require archaeological monitoring during grading activities, this impact would be reduced to a level less than significant.

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5.7 Hydrology

This section of the EIR discusses the potential environmental impacts of the proposed project associated with hydrology. Information contained in this section is summarized from the *Preliminary Drainage Study* (dated December 12, 2013) and *Preliminary Drainage Study – Addendum* (dated December 10, 2014) (Appendices F1 and F2, respectively, of this EIR); and the *Water Quality Technical Report* (dated April 2014) and *Water Quality Technical Report – Addendum* (dated December 10, 2014) (Appendices G1 and G2, respectively, of this EIR), prepared by Latitude 33 Planning and Engineering. These documents are provided on the attached CD of Technical Appendices found on the back cover of this EIR.

5.7.1 Existing Conditions

5.7.1.1 Hydrologic Setting

The project is located within the San Diego Hydrologic Unit (HU 907.00) as defined by the *Water Quality Control Plan for the San Diego Basin* (9). The San Diego Hydrologic Unit is a long, triangular shaped area of about 440 square miles drained by the San Diego River. El Capitan, San Vicente, Cuyamaca, Jennings, and Murray reservoirs are the major storage facilities. San Vicente Reservoir, Jennings Reservoir and Murray Reservoir store mainly Colorado River water, whereas, El Capitan mainly stores local runoff and some Colorado River water. Cuyamaca Reservoir stores only local runoff. Much of the impounded water is used to provide potable water to major population centers, including a portion of the San Diego metropolitan area and the communities of El Cajon, Santee, Lakeside, Alpine and Julian. Annual precipitation ranges from less than 11 inches at the coast to about 35 inches around Cuyamaca and El Capitan Reservoirs.

The project is located within the Mission San Diego Hydrologic Subarea (HSA 907.11), which is part of the Lower San Diego Hydrologic Area (HA 907.10), one of four HAs in the San Diego Hydrologic Unit: Lower San Diego, San Vicente, El Capitan, and Boulder Creek.

5.7.1.2 Existing Hydrology/Drainage

The existing site is comprised of a 5 story office building with an underground parking structure, printing facility, automotive service center, asphalt parking areas, drive aisles, and landscape areas. Approximate elevations within the project site range from 27 ft above mean sea level (amsl) to 42 ft amsl, with the highest geographical point located near the existing building situated on the southwestern edge of the site. The majority of site generally slopes to existing infrastructure that outfall directly to the San Diego River to the north. The storm water on the southerly portion of the site is collected within existing infrastructure and along Camino De La Reina and routed to a conveyance system that ultimately discharges into the San Diego River further downstream. The Pacific Ocean is the receiving water body in which the mouth of the San Diego River discharges at the community of Ocean Beach. The existing site is divided into seven drainage basins. The existing drainage basins are demarcated in Figure 5.7-1 below. The existing drainage basin conditions can be seen in Table 5.7-1 below. There are no known existing drainage issues for or adjacent to the proposed project site.

Table 5.7-1
Existing Drainage Basin Conditions

Basin	Area (acres)	C	Tc (min.)	Imp. Area (acres)	I_{50} (inches/hour)	Q_{50} (cfs)
E1	0.67	0.50	9.10	0.00	3.3	1.10
E2	1.14	0.73	8.90	0.65	3.2	2.66
E3	4.47	0.84	5.00	3.82	4.2	15.77
E4	3.84	0.88	8.30	3.65	3.4	11.38
E5	1.36	0.76	5.00	0.88	4.2	4.34
E6	1.40	0.86	5.00	1.25	4.2	5.05
E7	1.03	0.67	10.30	0.43	3.2	2.19
Site Total	**13.9**			**10.68**		**42.49**

Source: Latitude 33, 2014.

5.7.1.3 Wetlands

According to the *Union Tribune Mixed Use Project Biological Resources Report* prepared by Rocks Biological Consulting (Appendices D1 and D2 of this EIR), portions of the San Diego River north of the project site would be considered jurisdictional wetlands under local, state, and federal regulations, and part of this area would also be considered waters of the U.S. under federal regulation. The proposed project lies within a currently developed area and does not support wetland vegetation or City-jurisdictional wetlands. An existing storm drain spillway has created a small channel that presumably flows into the San Diego River during rain events, but does not support wetland species.

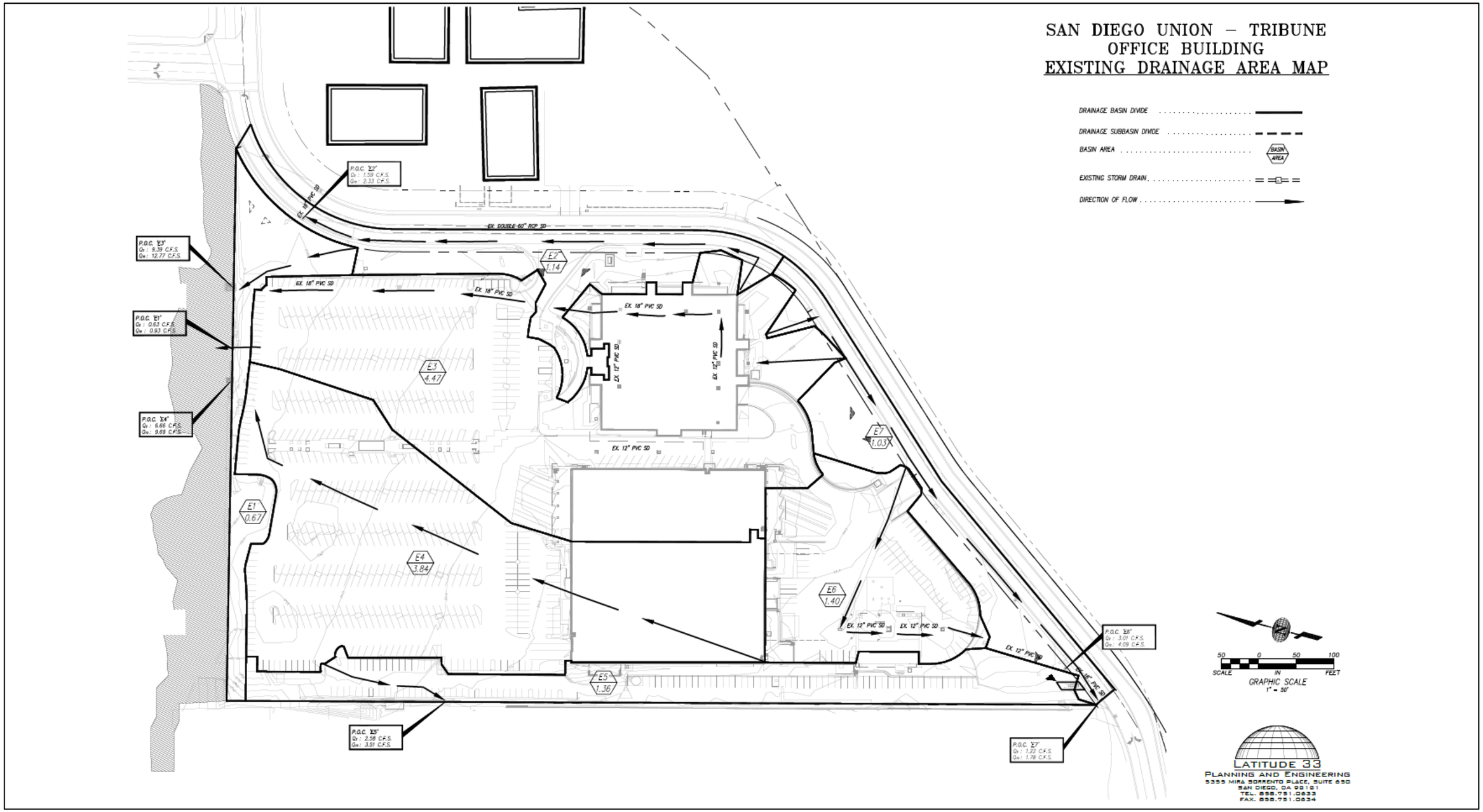
5.7.1.4 Flooding

A portion of the project site is within the mapped floodplain of a Special Flood Hazard Area (SFHA) (San Diego panel 1618F) as identified by the Federal Emergency Management Agency (FEMA). According to the FEMA Flood Insurance Rate Map (FIRM), a portion of the project site lies within SFHA Zone AE, which is an area inundated by 100-year flooding with Base Flood Elevations (BFE) determined. Additionally, a portion of the project site lies within Zone X, which includes areas inundated by 500-year flooding, 100-year flooding with average depths of less than one foot or with drainage areas less than one square mile, and areas protected by levees from inundation by 100-year flooding. The project site does not, however, encroach on the 35-foot buffer from the river's 100-year floodway established in the San Diego River Park Master Plan (City of San Diego, 2013).

5.7.1.5 Groundwater

Groundwater is defined as subsurface water that occurs beneath the water table in soils and geologic formations that are fully saturated. Groundwater bearing formations sufficiently permeable to transmit and yield significant quantities of water are called aquifers. Further, a groundwater basin is defined as a hydrogeologic unit containing one large aquifer or several connected and interrelated aquifers. All major drainage basins in the San Diego Region contain groundwater basins.

According to the *Geologic Reconnaissance – Union-Tribune Master Plan* prepared by Geocon Inc., groundwater presently exists beneath the project site at depths ranging from approximately nine to twelve feet below existing grade. Groundwater elevations are dependent on seasonal precipitation, irrigation, and land use among other factors, and vary as a result.



SOURCE: Latitude 33 Planning and Engineering, Inc., 2014

12/12/14

BRG CONSULTING, INC.

Union Tribune Mixed Use Project EIR

Existing Drainage Area

FIGURE 5.7-1

5.7.2 Issue 1 and Issue 2

Issue 1: Would the proposed project result in a substantial increase in impervious surfaces and associated increase in runoff?

Issue 2: Would the project result in substantial alteration to on- and off-site drainage patterns due to changes in runoff flow rates or volumes?

5.7.2.1 Impact Analysis

According to the City of San Diego's CEQA Significance Determination Thresholds, significant impacts to hydrology may occur:

- *If a project would result in increased flooding on- or off-site there may be significant impacts on upstream or downstream properties and to environmental resources.*
- *If a project would result in modifications to existing drainage patterns there may be significant impacts on environmental resources such as biological communities and archaeological resources.*

A. Hydrology/Drainage

The proposed drainage condition is similar to the existing drainage conditions. Flow paths are similar to existing conditions and outfall either into the San Diego River or into the existing infrastructure within Camino De La Reina, which is located directly adjacent to the project site. The proposed project site is divided into ten drainage basins. The proposed drainage basins are demarcated in Figure 5.7-2 below. The proposed drainage basin conditions can be seen in Table 5.7-2 below.

Table 5.7-2
Proposed Drainage Basin Conditions

Basin	Area (acres)	C	Tc (min.)	Imp. Area (acres)	I_{50} (inches/hour)	Q_{50} (cfs)
P1	0.78	0.85	5.8	0.70	3.9	2.61
P2	0.40	0.85	8.1	0.38	3.5	1.20
P3	0.29	0.85	6.1	0.17	3.9	0.97
P4	0.73	0.85	5.2	0.40	4.2	2.63
P5	2.85	0.85	6.4	2.33	3.8	9.28
P6	1.17	0.85	6.4	1.17	3.8	3.81
P7	0.40	0.85	5.7	0.40	3.9	1.34
P8	0.60	0.85	7.6	0.60	3.7	1.90
P9	0.49	0.85	5.0	0.49	4.3	1.81
P10	0.78	0.85	6.4	0.78	3.8	2.54
Site Total	**8.49**			**7.42**		**28.08**

Source: Latitude 33, 2014.

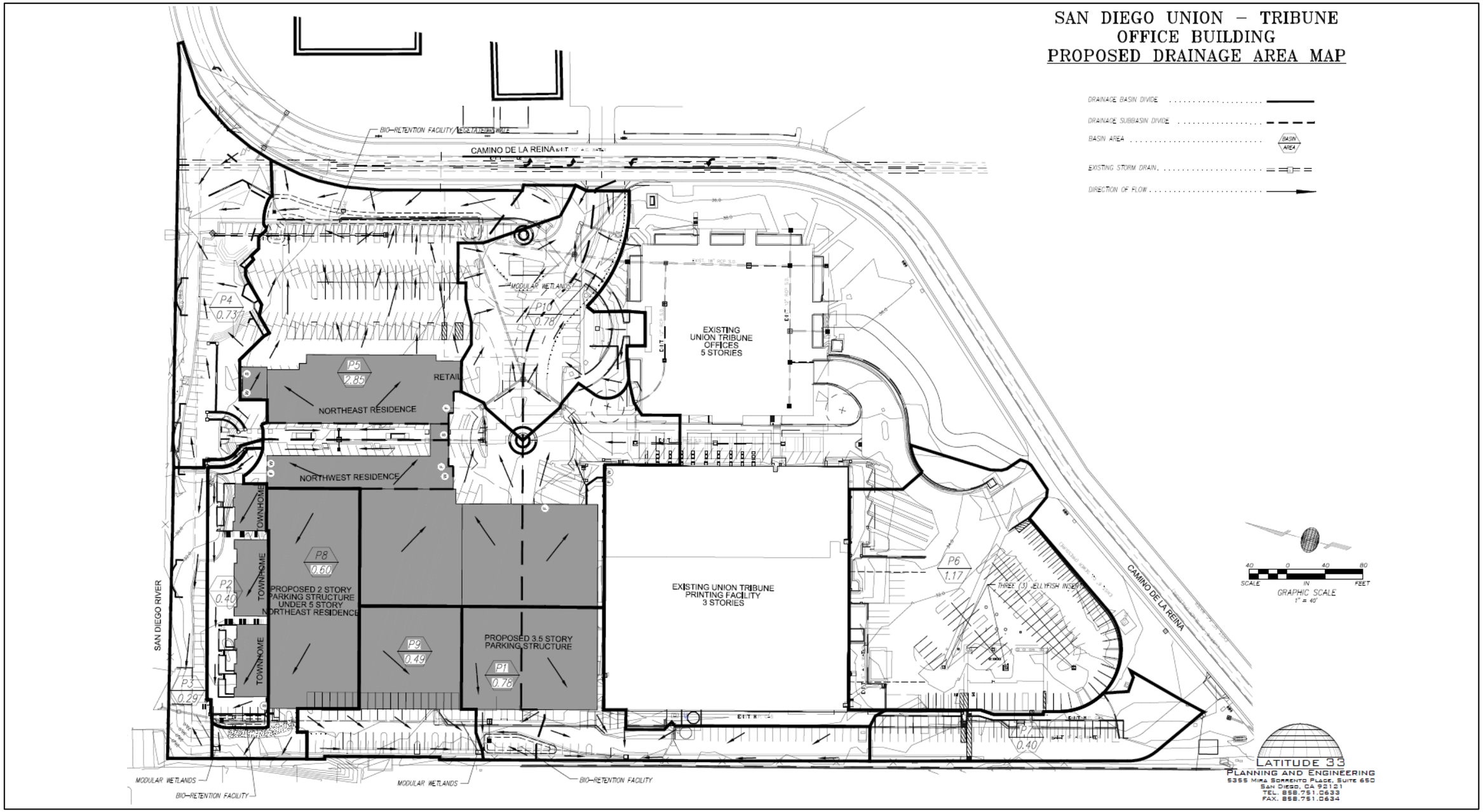
The project would not result in a substantial increase in impervious surfaces and associated runoff. Only a portion of the existing developed site will undergo construction-related changes to existing hydrologic conditions. Existing drainage patterns would be maintained as much as practicable in the proposed condition. Four of the existing drainage discharge points were maintained while two new discharge points were added. Although some of the individual basin sizes changed from the existing condition to the proposed condition, the overall basin size was decreased to 8.49 acres. The runoff from the existing development that is to remain, which flows south toward Camino De La Reina, would not be treated as it remains entirely separated from the proposed runoff prior to its discharge into the storm drain system. Based on preliminary hydrology calculations, there would be a decrease in overall flow from 42.5 cfs to 28.1 cfs as a result of the proposed project.

The overall flow (Q_{50}) for the proposed project was reduced because of the decrease in impervious surface area and increase in permeability when compared to the existing condition; therefore, the proposed project would be exempt from completing a Hydromodification Management Plan (HMP) because the proposed project provides a reduction in impervious area and would not increase unmitigated peak flows to any outlet location (RWQCB, 2011). Additionally, the overall flow was reduced through the use of bio-retention basins. Flows similar to the existing condition have either been reduced or routed to proposed bio-retention basins before ultimately discharging into the existing storm drain system, or directly into the San Diego River. During smaller storm events (2- and 5-year), the bio-retention basins and filtration units would capture water and allow infiltration into engineered soils which will drain through a sub-drain and be conveyed into the storm drain. The infiltration rate of 5 inches per hour results in an increased time of concentration (Tc). For larger storm events (50- and 100-year), the initial flush would be retained while the additional flow would be routed through a properly sized outflow. Overall these facilities treat and capture stormwater in order to reduce pollutants, increase time of concentration, and reduce the runoff volumes associated with the proposed project. Based on the Intensity-Duration-Frequency Curves developed for San Diego County, which can be found in the *Addendum to the Preliminary Drainage Study*, the increased time of concentration corresponds to a smaller intensity. As such, the proposed project would improve stormwater runoff quality as compared to existing conditions, thus improving buffer and wetland water purification functions.

Additionally, the proposed project includes porous access areas, which would allow water infiltration for site runoff and improve water quality runoff as compared to the existing condition under which much of the site runoff flows untreated into the wetland buffer and river.

B. Flooding

As previously discussed, the proposed project site lies within the mapped 100-year floodplain of the SFHA as identified by FEMA. The project site is specifically within SFHA Zone AE and Zone X. As such, floodplain management and flood proofing within the City of San Diego shall be based upon existing conditions in accordance with the City Floodplain Management Requirements and FEMA regulations. Under City requirements, the minimum elevation of the finished floor elevation of any building must be two feet above the 100-year frequency flood elevation. In addition, as required for compliance with the City of San Diego development code, the proposed project excludes development within the 35-foot wide River Corridor Area immediately south of the FEMA 100-year floodway boundary.



SOURCE: Latitude 33 Planning and Engineering, Inc., 2014

12/12/14

BRG CONSULTING, INC.

Union Tribune Mixed Use Project EIR

Proposed Drainage Area

FIGURE
5.7-2

With the project site's noted floodway encroachment, implementation of the proposed project could potentially result in significant and unavoidable flooding impacts. A request for the Conditional Letter of Map Revision Based on Fill (CLOMR-F), dated July 10, 1995, was written by Rick Engineering for the Union Tribune Publishing Company. The analysis performed by Rick Engineering sets a new floodplain limit based on existing and proposed contours. A CLOMR-F was submitted by Latitude 33 to the City of San Diego on November 5, 2013. The application was submitted by the City and accepted for review by FEMA on November 18, 2013. FEMA approved the CLOMR-F on July 1, 2014. This approval serves as evidence that the potential for significant flooding impacts does not exist. Therefore, the proposed project would not result in a significant flooding impact.

5.7.2.2 Significance of Impact

The proposed project would decrease the amount of impervious surfaces and associated runoff and would not result in a substantial alteration to on- and off-site drainage patterns. Since the overall flow has decreased, no mitigation of downstream storm drain improvements is required. Therefore, the proposed project would not have any significant impacts to hydrology.

5.7.2.3 Mitigation, Monitoring, and Reporting

Because there are no anticipated significant impacts to hydrology, no mitigation measures are required.

5.7.2.4 Impacts After Mitigation

No mitigation would be required; therefore, there are no impacts after mitigation.

5.7.3 Conclusion

The proposed project would not have any significant impacts to hydrology. The total site discharge would be decreased by decreasing the amount of impervious surfaces from that of the existing condition. Additionally, existing and proposed flows would be routed to bio-retention facilities, which increase the time of concentration providing smaller intensities. Although the flows associated with Camino De La Reina would be increased due to the dedication/widening of the road, the overall flows would be decreased within the infrastructure; therefore, no mitigation of downstream storm drain improvements are required. Since the limits of the overall drainage basin would be decreased, and the overall runoff from the existing site would be decreased, the proposed project would not have an adverse effect on the existing drainage condition. Furthermore, the finished floor elevation of the structures would be two feet above the 100-year frequency flood elevation to address potential impacts associated with flooding. Therefore, implementation of the proposed project would not result in significant impacts to hydrology.

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5.8 Public Services and Facilities

This section of the EIR discusses the potential environmental impacts of the proposed project associated with public services and facilities.

5.8.1 Existing Conditions

5.8.1.1 Police Protection

Police protection within the City of San Diego is provided by the San Diego Police Department. Police services for the proposed project would be provided by officers from the Western Division located at 5215 Gaines Street in the City of San Diego. The service area for the project is Beat 623. Western Division provides police services to the following communities: Linda Vista, Morena, Mission Valley West, University Heights, North Park, Burlingame, Hillcrest, Midtown, Mission Hills, Midway District, Loma Portal, Point Loma Heights, Ocean Beach, Sunset Cliffs, Roseville/Fleet Ridge, La Playa and the Wooded Area. The San Diego Police Department has mutual aid agreements with all other Law Enforcement Agencies in San Diego County.

Western Division is currently staffed with 124 sworn personnel and two civilian employees. Officers work ten-hour shifts. Staffing is comprised of three shifts, which operate from 6:00 am - 4:00 pm (First Watch), 2:00 pm - Midnight (Second Watch), and from 9:00 pm - 7:00 am (Third Watch). Using the Department's recommended staffing guidelines, Western Division currently deploys a minimum of 15 patrol officers on First Watch, 18 patrol officers on Second Watch, and 11 patrol officers on Third Watch.

The San Diego Police Department does not staff individual stations based on ratios of sworn officers per 1,000 population ratio. The goal citywide is to maintain 1.48 officers per 1,000 population ratio, which the Department is currently meeting based on a 2011 estimated residential population of 1,311,882.

The Department currently utilizes a five-level priority call dispatch system, which includes priority E (Emergency), one, two, three and four. The calls are prioritized by the phone dispatcher and routed to the radio operator for dispatch to the field units. The priority system is designed as a guide, allowing the phone dispatcher and the radio dispatcher discretion to raise or lower the call priority as necessary based on the information received. Priority E and priority one calls involve serious crimes in progress or those with a potential for injury. Priority two calls include vandalism, disturbances and property crimes. Priority three includes calls after a crime has been committed such as cold burglaries and loud music. Priority four calls include parking complaints or lost and found reports.

Table 5.8-1 below lists the department's response-time guidelines, the 2012 citywide average response times for each priority call level, and the 2012 average response times for each priority level call within Beat 623. As indicated in Table 5.8-1, average response times for Beat 623 are below the Police Department goals for priority call types E, 1, 2, and 3, and exceed the Police Department goals for priority 4 calls. The Department strives to maintain the response time goals identified in Table 5.8-1 as one of various other measures used to assess the level of service to the community.

Table 5.8-1
Western Division Call Priority Response Times

Call Priority	Department Goal Response Times	2012 Citywide Average Response Times	2012 Beat 623 Average Response Times
Priority E – Imminent threat to life	Within 7 minutes	6.3 minutes	5.5 minutes
Priority 1 – Serious crimes in progress	Within 14 minutes	11.8 minutes	9.9 minutes
Priority 2 – Less serious crimes with no threat to life	Within 27 minutes	25.2 minutes	26.1 minutes
Priority 3 – Reported after a crime has been committed	Within 70 minutes	61.9 minutes	67.2 minutes
Priority 4 – Parking complaints and lost and found reports	Within 70 minutes	67.4 minutes	114.1 minutes

Sources: City of San Diego 2008a; Freedman, pers. comm. 2013.

5.8.1.2 Fire/Life Protection

The proposed project site is located within the service area of the City of San Diego Fire-Rescue Department. The City Fire-Rescue Department serves a total area of approximately 331 square miles, population of 1,337,000, and 17 miles of coastline extending three miles offshore (City of San Diego Fire-Rescue, 2013). Fire Station 5 currently serves the existing project site, and would continue to be the primary station servicing the proposed project site. Station 5 is located at 3902 9th Avenue, which is approximately 1.2 miles southeast from the proposed project, and serves Hillcrest and its surrounding areas. Engine 5's district is 4.12 square miles (City of San Diego Fire-Rescue, 2013). This station includes a fire engine and a battalion chief's vehicle, and has no paramedic unit. Additional fire stations that provide fire and emergency services for the project site include:

- Fire Station 8 located at 3974 Goldfinch St.
- Fire Station 14 located at 4011 32nd Street
- Fire Station 20 located at 3305 Kemper Boulevard
- Fire Station 23 located at 2190 Cornstock Street
- Fire Station 25 located at 1972 Chicago Street

Response time estimates for the proposed project, located at 350 Camino de la Reina, are calculated using San Diego Fire-Rescue 911 Computer Aided Dispatch System (CAD) point-to-point routing. This application uses the road network generating the closest path from the fire station address to the requested location. Table 5.8-2 provides the response times (including dispatch and turnout) for the fire stations servicing the project site.

In June 2011 the City adopted the recommendations of the Fire Service Standards of Response Coverage Deployment Study for the City of San Diego Fire-Rescue Department Report, also known as the Citygate Report. Based on the Citygate Report, the City adopted the performance measure that first due-units to treat medical patients and control small fires should arrive within 7.5 minutes 90 percent of the time from the receipt of the 911 call in fire dispatch (Citygate 2011, City of San Diego 2011). This equates to a one-minute dispatch time, 1.5-minute company turnout time and five-minute drive time in the most populated areas. To confine fires near the room of origin, to stop wildland fires to under three acres when noticed promptly, and to treat up to five medical patients at once, a multiple-unit response of at least 17 personnel should arrive within 10.5 minutes from the time of 911 call receipt in fire

dispatch 90 percent of the time. This equates to a one-minute dispatch time, 1.5-minute company turnout time, and eight minute drive time spacing for multiple units in the most populated areas.

Table 5.8-2
Responding Vehicles and Response Times

Responding Vehicle	Fire Station	Address	Response Time (minutes)
Engine 5	Station 5	3902 9th Avenue	7.0
Engine 8	Station 8	3974 Goldfinch Street	8.3
Engine 23	Station 23	2190 Comstock Street	8.4
Engine 20	Station 20	3305 Kemper Boulevard	8.4
Truck 20	Station 20	3305 Kemper Boulevard	8.4
Truck 14	Station 14	4011 32nd Street	9.8
Battalion Chief 2	Station 5	3902 9th Avenue	7.0
Battalion Chief 3	Station 25	1972 Chicago Street	9.7

Source: City of San Diego Fire-Rescue Department, 2013.

5.8.1.3 Libraries

The proposed project is located within the City of San Diego Public Library system. The City of San Diego General Plan states that the library system is a vital learning presence in the community, providing information objectively and offering lifelong learning opportunities through the system's Central Library and 35 branches. The library system conducts regular evaluations of services to adapt to service demands, take advantage of constantly evolving technology, and to provide for facility construction and maintenance costs. Such assessments contribute to the provision of adequate collections that are responsive to community needs. The facility requirements for branch libraries establish a minimum of 15,000 square feet of dedicated library space and should include features and services that address community specific needs (City of San Diego, 2008a). The closest City of San Diego Public Library branches to the proposed project are the Mission Hills Library located at 925 W. Washington Street, approximately 1.1 miles from the proposed project, and the University Heights Library located at 4193 Park Boulevard, approximately 1.3 miles from the proposed project.

5.8.1.4 Parks/Recreational Facilities

The City of San Diego has over 38,930 acres of park and open space lands that offer a diverse range of recreational opportunities. Parks can improve the quality of life by assisting in maintaining physical well-being. Parks can also provide other benefits, including visual relief from urban development, passive recreational opportunities, and healthy activities for youth (City of San Diego, 2008b). The City operates three different types of parks for residents and visitors, including population-based parks (neighborhood and community), resource-based parks that include natural or man-made resources intended to serve the citywide population, and open space parks that allow public access to undeveloped natural landforms. The proposed project is located within the Mission Valley Community Planning area, which is within the North Central Region of the City's Recreation Element. Table 5.8-3 provides the total parks space within the North Central Region.

Table 5.8-3
North Central Region Parks and Open Space

Population	Population Based Parks (acres)	Resource Based Parks (acres)	Open Space Lands (acres)	Other Park Lands (acres)	Total Parks and Open Space (acres)
208,099	450.0	476.8	1,993.6	0.0	2,920.4

Source: City of San Diego, 2008b.

The City's Recreation Element establishes a minimum standard of 2.8 acres per 1000 people for population-based parks. This standard can be met through neighborhood and community park acreage, as well as park equivalencies. Currently, Mission Valley has 8 acres of existing public park land and in the near future approximately 17.5 acres will be added at the Quarry Falls development. Based on existing and projected populations, the Mission Valley Community requires an additional 47.5 acres of public park land today and an additional 65.2 acres of public park land in 2030 to meet the General Plan standards for population-based parks. There is no standard for open space or resource-based parks in the City's Recreation Element.

According to the General Plan, recreation facilities include recreation centers and aquatic complexes. Per the General Plan standards, recreation centers should be a minimum size of 17,000 square feet per 25,000 residents, while aquatic complexes should provide a swimming pool with a minimum standard size of 25 meters by 25 yards and should be located within a one and a half to two mile service radius for every 50,000 residents. The Mission Valley Community does not currently have a public recreation center or aquatic complex.

5.8.1.5 Schools

The project site is located within the San Diego Unified School District (SDUSD) service area and within the Carson attendance boundary for elementary schools, Montgomery attendance boundary for middle schools, and Kearny Complex attendance boundary for high schools (SDUSD, 2013). Carson Elementary is located approximately 0.8 miles to the north of the project site; Montgomery Middle School is approximately 1.6 miles to the north; and Kearny High School Educational Complex is approximately 2.5 miles to the north. Table 5.8-4 below shows the existing enrollment and capacity for each of the schools serving the proposed project. Additionally, a number of charter and alternative schools are located within the vicinity of the proposed project. Atypical and alternative schools in the proposed project area include Longfellow and Twain Main, each located to the northwest of the project site. The closest charter school is San Diego Cooperative, located to the north of the proposed project off State Route 163 (SR-163).

Table 5.8-4
School Capacity and Student Generation

School	Estimated Capacity	2013-14 Enrollment	2014-15 Enrollment	Project Student Generation*
Carson	658	523	476	5-9
Montgomery	740	490	476	1-2
Kearny High Complex	1,766	1,550	1,504	2-4

Notes: *Based on student generation rates of 0.040-0.080 (K-5), 0.015-0.030 (6-8), and 0.015-0.030 (9-12).
Source: Hudson, San Diego Unified School District, pers. comm. 2014.

The capacities identified above are approximate and are calculated using current class size ratios. If class size ratios change, additional or less capacity may be available. In addition, Montgomery Middle School is currently under Quality Education Investment Act (QEIA) class size reductions through 2014-2015.

5.8.1.6 Roadways

The proposed project is located at 350 Camino De La Reina in the Mission Valley Community within the City of San Diego. The project site lies in the northwest quadrant of the Interstate 8 (I-8)/SR-163 interchange, south of Friars Road and Fashion Valley Mall. The principle roadways in the study area are identified below:

Study Area Streets

- Friars Road
- Fashion Valley Road
- Frazee Road
- Avenida Del Rio
- Hazard Center Drive
- Camino De La Reina
- Camino Del Rio N.
- Mission Center Road
- Hotel Circle North
- Hotel Circle South

Existing Street Segment Operations

Based on average daily traffic volumes, street widths and functional classification and city street standards, existing street segment LOS were determined. Table 5.2-3 in Section 5.2, Transportation/Circulation/Parking of this EIR summarizes the existing street segment operations. All streets in the study area, except for the following segments, presently operate at an LOS C or better:

- Friars Road: Avenida De Las Tiendas to Ulric Street (LOS F)
- Friars Road: SR-163 to Frazee Road (LOS F)
- Camino De La Reina: Avenida Del Rio to Camino De La Siesta (LOS F)
- Hotel Circle N.: I-8 WB Ramps to Fashion Valley Road (LOS F)
- Hotel Circle N.: Fashion Valley Road to Camino De La Reina (LOS E)
- Hotel Circle S.: I-8 EB Ramps to Bachman Place (LOS E)
- Hotel Circle S.: Bachman Place to Camino De La Reina (LOS E)
- Fashion Valley Road: Avenida Del Rio to Hotel Circle N. (LOS E)

5.8.2 Issue 1

Issue 1: Would the proposed project have an effect upon, or result in a need for new or altered governmental services in any of the following areas:

- **Police protection**
- **Fire/life protection**
- **Libraries**

- **Parks or other recreational facilities**
- **Schools**
- **Roads**

5.8.2.1 Impact Analysis

According to the City of San Diego's CEQA Significance Determination Thresholds, a significant impact would occur if the proposed project had the potential to result in physical impacts from construction or alteration of government facilities based on the following:

- *Would the project conflict with the community plan in terms of number, size, and location of public service facilities; and,*
- *If so, are there direct impacts from construction of proposed new public service facilities needed to serve the project.*

The City's Significance Determination Thresholds also specify the following thresholds relating to Police and Fire-Rescue services if the project exceeds the threshold of 75 dwelling units or 100,000 square feet of nonresidential construction:

- *Is the project located in a brush fire hazard area, hillside, or an area with inadequate fire hydrant services or street access;*
- *Does the project involve the use, manufacture, or storage of toxic, readily combustible, or otherwise hazardous materials;*
- *Would the project's location provide for adequate San Diego Fire Department access as determined by Fire and Life Safety staff to be in conformance with the California Fire Code and Fire and Hazard Prevention Services Policy A-00-1; and,*
- *Would the project substantially affect police or fire-rescue response times (i.e., increase the existing response times in the project area).*

A. Police Protection

The existing project site is served by Beat 623 in the Mission Valley West neighborhood, which is located within the service boundary of 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 Beat 623 of the Western Division of the San Diego Police Department. Table 5.8-1 above indicates that the response times for the Priority E through Priority 3 calls within Beat 623 are all below the Department goal response times, while, response times for Priority 4 calls within Beat 623 exceed the Department goal response times.

The proposed project includes the addition of 200 multiple dwelling units, and would thus increase the population requiring police services in the area. However, correspondence with Police Lieutenant Rich Freedman did not identify any impacts associated with the proposed project. As Lt. Freedman indicated, the proposed project would not increase population at a substantial level that would require additional services. Additionally, the proposed

project site lies within the property boundary of the existing Union Tribune building, adjacent to existing streets currently patrolled by police officers, and is not anticipated to increase response times.

The Department is currently reaching its targeted staffing ratio of 1.48 sworn officers per 1,000 residents based on a 2011 estimate residential population of 1,311,882. The ratio is calculated to take into account all support and investigative positions within the Department. This ratio does not include the significant population increase resulting from citizens who commute to work from outside the City of San Diego or those visiting. There are no current plans for additional police sub-stations in the immediate area. Police response times in this community will continue to grow with the build-out of community plans and the increase of traffic generated by new growth. A Crime Prevention Through Environmental Design (CPTED) review is recommended by the Department to address general security concerns.

The Police Department has not identified any impacts associated with the proposed project. Existing facilities would continue to serve the proposed project site, and would not require the construction of new facilities. Furthermore, the City's *Significance Determination Thresholds* require large and small developers to contribute to the construction of new facilities through the mandatory payment of Developer Impact Fees (DIFs) and Facility Benefit Assessments (FBAs) as conditions of project approvals to address capital costs of police services. As such, the proposed project does not require an amendment to the Mission Valley Public Facilities Financing Plan (PFFP). Therefore, impacts associated with police protection would be less than significant.

B. Fire/Life Protection

Fire Station 5 of the San Diego Fire-Rescue Department, located 1.2 miles southeast at 3902 9th Avenue, serves the existing project site. Fire protection for the proposed project would continue to be provided by Fire Station 5. 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. It is not anticipated that the proposed project would result in an increase in average response time for the area. Additionally, the San Diego Fire-Rescue Department utilizes a system called "live routing", which keeps track of the location of service vehicles at any given time. This system allows for service vehicles nearest to the vicinity of the call location to respond.

The proposed project would consist of 200 dwelling units and 3,000 square feet of retail amenity space, which would increase the overall population density on the project site at any given time. It can be assumed that density would be at its highest during normal office hours. However, the change in population density is not anticipated to affect fire resources and services. As mentioned above, the "live routing" system currently being used by the San Diego Fire-Rescue Department allows for the service vehicle closest to the call location to respond, which supplements the services provided by Fire Station 5. Additionally, Fire Station 5 is designated for an upgrade and remodel, which may increase service capacity as needed.

Although the number of runs would increase with the higher density housing of the proposed project, the San Diego Fire-Rescue Department has indicated that impacts would be less than significant. Existing facilities would serve the proposed project site, and would not require the construction of new facilities. Furthermore, the City's *Significance Determination Thresholds* require large and small developers to contribute to the construction of new facilities

through the mandatory payment of DIFs and FBAs as conditions of project approvals to address capital costs of Fire-Rescue services. As such, the proposed project does not require an amendment to the Mission Valley PFFP. Therefore, impacts to fire and life protection resources and services would be less than significant.

C. Libraries

The proposed project includes the addition of 200 multiple dwelling units, which may potentially increase the number of people utilizing local branch libraries in the San Diego Public Library system. The Mission Hills Library and the University Heights Library are within both the 2.0-mile maximum service area identified in the City's *Significance Determination Thresholds*. As such, both could potentially serve as local branch libraries to future residents of the proposed project. Furthermore, as required in the City of San Diego's General Plan, the project would make a fair share contribution to library facilities. As such, the proposed project does not require an amendment to the Mission Valley PFFP. Therefore, the libraries would adequately service the increase in residents as a result of the proposed project, and impacts to these branches would be less than significant.

D. Parks/Recreational Facilities

The proposed project includes the addition of 200 dwelling units, which would result in a 0.84-acre population-based park requirement per the General Plan standard for population-based parks using an average of 1.5 persons per household. The project proposes to provide 0.27 acres of a population-based public pocket park on site in the northeast corner of the project. In addition, the project is implementing the San Diego River Park Master Plan Design Guidelines Sections 4.3.2 through 4.3.4 and therefore population-based credit is granted to the 0.54 acres along the north boundary of the project area. The new public pocket park and the San Diego River Park area will remain in private ownership and will be privately maintained and a "Recreation Easement" will be recorded on the land for public use of the public pocket park and the river park. These two population-based park areas are considered a park equivalency per the General Plan. The total population-based park equivalency credit provided by this project is 0.81 acres. The remaining deficit of 0.03 acres of population-based park space required per General Plan standards would be provided through the payment of DIFs. As such, the proposed project does not require an amendment to the Mission Valley PFFP. Therefore, impacts to park and recreational facilities would be less than significant.

E. Schools

The proposed project includes the addition of 200 dwelling units, which would result in increased enrollment by future students in each of the three SDUSD schools serving the project area. Table 5.8-3 above shows the existing enrollment and capacity for each of the schools serving the proposed project area. Between these three schools, there is adequate capacity available to serve the proposed project and development of a new school within the project area would not be required (Hudson pers. comm., 2013). Furthermore, SB 50, enacted on August 27, 1998, significantly revised developer fee and mitigation procedures for school facilities as set forth in Government Code Section 65996. The legislation holds that an acceptable method of offsetting a project's effect on the adequacy of school facilities is payment of a school impact fee prior to issuance of a building permit. Once paid, the school impact fees would serve as mitigation for any project related impacts to school facilities. As such, the City is legally prohibited from imposing any mitigation related to school facilities, as payment of the appropriate fees constitutes full and complete mitigation. As such, the proposed project does not require an amendment to the Mission Valley PFFP. Therefore, impacts to schools would be less than significant through implementation of SB 50.

F. Roadways

The proposed project consists of 200 dwelling units and 3,000 square feet of retail amenity space, which would likely increase the overall volume of traffic accessing the proposed project site on any given day. The potential increase in vehicles travelling on the road segments in the study area would potentially affect roadway conditions for those segments. The impacts relating to traffic and roadways as a result of the proposed project are discussed in detail in Section 5.2 Traffic/Circulation/Parking of this EIR, as well as the Traffic Impact Analysis provided as Appendix B of this EIR. The traffic impact analysis determined that the project would result in impacts to area roadways due to the increased traffic to and from the site at project build out. An increased need for maintenance of affected public roadways would result from the increased traffic and identified impacts associated with the project. The implementation of a TDM Program would reduce impacts to the extent feasible; however, with the implementation of the proposed project, impacts to one intersection and four street segments would remain significant and unavoidable. Impacts to roadways are therefore considered significant.

5.8.2.2 Significance of Impact

A. Police Protection

The proposed project would not increase the population at a substantial rate that would require the construction of additional police facilities or impair existing police services and response times. In addition, the proposed project site is located in an area currently patrolled by police officers, and would not require additional services. Furthermore, the City's *Significance Determination Thresholds* require large and small developers to contribute to the construction of new facilities through the mandatory payment of fees to address capital costs to police services. Therefore, impacts associated with police protection would be less than significant.

B. Fire/Life Protection

The proposed project would not increase the population at a substantial rate that would require the construction of additional fire facilities or impair existing fire services and response times. In addition, the proposed project site is located in an area currently served by Fire Station 5, as well as the additional fire stations identified above. The San Diego Fire-Rescue Department utilizes the "live routing" system to increase efficiency by allowing the closest service vehicle to the call location to respond. Furthermore, the City's *Significance Determination Thresholds* require large and small developers to contribute to the construction of new facilities through the mandatory payment of fees to address capital costs to Fire-Rescue services. Therefore, impacts associated with fire/life protection would be less than significant.

C. Libraries

The proposed project would not increase the population at a substantial rate that would require the construction of additional library facilities or impair existing library facilities, and the existing branches would adequately service the increase in residents as a result of the proposed project. Additionally, the developer is required by the City of San Diego General Plan to make a fair share contribution to library facilities. Therefore, impacts to library services would be less than significant.

D. Parks/Recreational Facilities

There are a number of neighborhood and community parks within a 1.5-mile radius of the proposed project site. The proposed project provides 0.81-acres of population-based park on site, which includes the 0.27-acre public pocket park and the 0.54-acre river park. The remaining deficit of 0.03 acres of population-based park space required per General Plan standards would be provided through the payment of DIFs. As such, the proposed project would meet the population-based park requirements set forth in the City's General Plan. Therefore, there would be no impacts to parks or recreational facilities.

E. Schools

The proposed project would not increase the population at a substantial rate that would require the construction of additional schools. As such, the three schools currently serving the project area have adequate capacity to accommodate any new students generated by the proposed project. In addition, any external costs to schools would be offset through payment of school impact fees by the developer as required by Government Code Section 65996 and SB 50. Therefore, impacts to schools would be reduced to a less than significant level.

F. Roadways

As discussed in the traffic analysis summarized in Section 5.2, Transportation/Circulation/Parking, the project would result in significant and unavoidable impacts to one intersection and four street segments. Impacts to roadways are therefore also considered significant and unavoidable.

5.8.2.3 Mitigation, Monitoring, and Reporting

The proposed project would not result in any significant impacts to public services and facilities. In addition, developer fees, such as school impact fees, DIFs, and FBAs would offset capital costs to public services and facilities that may result from implementation of the proposed project. Therefore no mitigation measures are required.

5.8.2.4 Impacts After Mitigation

No mitigation measures are required; therefore there would be no impacts after mitigation.

5.8.5 Conclusion

Implementation of the proposed project would not result in significant impacts to public services and facilities. Potential impacts related to police protection, fire-rescue protection, libraries, and schools would be offset by state mandated developer fees and fair share contributions. Furthermore, the proposed project includes the creation of a public river park and public pocket park on the project site. Roadway impacts and Mitigation Measures are discussed in Section 5.2, Transportation/Circulation/Parking. Therefore, impacts to public services and facilities, specifically to police protection, fire-rescue protection, libraries, schools, and parks and recreation would be less than significant.

5.9 Public Utilities

This section of the EIR discusses the potential environmental impacts of the proposed project associated with public utilities. Information contained in this section is summarized from the following technical reports: *Water Supply Assessment Requirement Analysis* dated December 30, 2014 (Appendix J of this EIR), *Preliminary Drainage Study* dated December 12, 2013 and *Preliminary Drainage Study – Addendum* dated December 10, 2014 (Appendices F1 and F2 of this EIR), *Preliminary Sewer Study* dated November 21, 2013 and *Sewer Study Addendum Memorandum* dated October 14, 2014 (Appendices H1 and H2 of this EIR), and *Waste Management Plan – Update to Approved May 24, 2013* dated October 2014 (Appendix I of this EIR) prepared by Latitude 33; and, *Greenhouse Gas Assessment* (dated October 6, 2014) (Appendix C of this EIR). These documents are provided on the attached CD of Technical Appendices found on the back cover of the EIR.

5.9.1 Existing Conditions

5.9.1.1 Water

The City of San Diego Public Utilities Department (PUD) Water Branch provides potable and reclaimed water service to the proposed project area, as well as to the remaining 1.3 million residents of the City. The PUD treats and delivers more than 200,000 acre-feet (AF) of water per year to the City. The water system extends over 404 square miles, including 342 square miles within the City. In addition to delivering potable water, the City has an existing recycled water program. The objectives of the recycled water program are to optimize the use of local water supplies, lessen the reliance on imported water and free up capacity in the potable system.

The existing water system consists of primarily nine raw water storage facilities with over 408,000 AF of storage capacity, three water treatment plants, 28 treated water storage facilities, and more than 3,294 miles of transmission and distribution lines. The PUD maintains and operates nine local surface raw water storage facilities (reservoirs), which are connected directly or indirectly to the City's water treatment operations. The nine City managed reservoirs include Lower Otay, Barrett, Morena, El Capitan, San Vicente, Sutherland, Lake Murray, Miramar, and Lake Hodges. The PUD maintains and operates three water treatment plants with a combined total rated capacity of 294.4 million gallons per day (MGD), which includes the Miramar Water Treatment Plant, the Alvarado Water Treatment Plant, and the Otay Water Treatment Plant. The PUD maintains and operates 28 treated water storage facilities including steel tanks, standpipes, concrete tanks and rectangular concrete reservoirs, with capacities varying from less than one to 35 million gallons.

In addition, the water system consists of more than 3,193 miles of pipelines, including transmission lines up to 84 inches in diameter and distribution lines as small as four inches in diameter. In addition, the PUD maintains and operates 49 water pump stations that deliver treated water from the water treatment plants to approximately 279,557 metered service connections in 128 different pressure zones.

The City's recycled water system consists primarily of two water reclamation plants with a combined total wastewater treatment capacity of 45 MGD, three recycled water storage facilities with over 12 million gallons of storage capacity, and more than 91 miles of transmission and distribution lines.

The PUD relies on imported water as its major water supply source, and is a member public agency of the San Diego County Water Authority (Water Authority), which itself is a member agency of the Municipal Water District (MWD).

5.9.1.2 Wastewater

There are three main gravity sanitary sewer branches on the existing site. One branch serves the print facility, the second branch serves the office building, and the third branch serves the automotive service center. The first branch, a 4-inch line, begins on the north side of the print facility, turns south, and runs between the print facility and the office building where it meets up with a 6-inch line on the east side of the print facility. This 6-inch line then enters into the existing office building on the west side of the building. The second branch, a 6-inch line, services the existing office building. This line converges with the 6-inch line that enters the building from the west side, where the line becomes an 8-inch line at that point. The 8-inch line connects to a private lift station located on the south side of the existing office building. The third branch is a 4-inch line that runs from the automotive service center to the same private lift station located on the south side of the existing office building.

This combined system connects to the private on-site lift station, then exits as a private 6-inch cast iron force main. This private force main circumvents the southwest side of the project site where it continues as an existing private force main in the public right of way along Camino De La Reina (per City Drawing No. 3601-C-1). The private force main sewer in Camino De La Reina then connects directly to the Mission Valley Trunk Sewer (at a manhole) on the south side of the Interstate 8 (I-8) per drawing 16473-2-D, which can be found in the Preliminary Sewer Study (Appendix H1 of this EIR). Wastewater conveyed via the North Metro Interceptor Sewer ultimately flows to the Point Loma Wastewater Treatment Plant.

The UT property discharges approximately 9,300 gallons of wastewater per day (gpd) on average, according to the UT San Diego Engineering & Maintenance. The current private lift station was sized to accommodate 792 fixture units (FU), or the equivalent of 11,880 gpd.

5.9.1.3 Storm Drainage

As discussed in Section 5.7 – Hydrology of this EIR, the existing site is comprised of a five-story office building with an underground parking structure, printing facility, automotive center, asphalt parking areas, drive aisles, and landscape areas. The majority of the site generally slopes to existing infrastructure that outfall directly to the north at the San Diego River. The stormwater on the southerly portion of the site is collected within existing infrastructure along Camino De La Reina and routed to a conveyance system that ultimately discharges into the San Diego River further downstream. The site is divided into seven drainage basins:

- Basin E1 sheet flows off the north edge of the project down steep slopes directly into the San Diego River.
- Basin E2 collects flows from the existing drive aisle and slopes along the eastern portion of Camino De La Reina, which is routed along the western curb line and into an existing inlet at a low point in the street. This conveyance is tied to an existing double 60” RCP storm drain culvert, which outfalls to the San Diego River.
- Basin E3 includes flow from a large portion of the existing parking lot and associated drive aisles, as well as infrastructure within the parking structure and roof drains from the existing UT Offices, and a portion of the Printing Facility. These flows collect within the drainage system or enter through an inlet at the northeastern corner of the parking lot and collectively discharge to the river.

- Basin E4 includes the remainder of flow from the large parking lot, drive aisles, and roof drains from the printing facility. It then sheet flows to one curb inlet on the north edge of the site and discharges to the river.
- Basin E5 slopes to the western edge of the site collecting flows and routing drainage to the river through earthen swales.
- Basin E6 includes flow from the drive aisle of the eastern portion of Camino De La Reina and along with the associated parking areas. Some of the runoff collects in an existing concrete swale before combining with other runoff before it enters an existing conveyance which ties to a drainage system within Camino De La Reina and ultimately discharges to the river downstream.
- Basin E7 includes slopes from the western portion of Camino De La Reina, which are routed along the western curb line and into an existing inlet within the street, and tied to the conveyance listed above.

5.9.1.4 Solid Waste

Solid waste disposal in the project area is provided by the combined services of the City of San Diego's Environmental Services Department (ESD) and private contractors. Establishments deposit refuse into collection bins, which are then emptied by City-franchised private contractors. Waste collected is taken to local landfills.

Refuse collected from the project area most likely will be taken to the City-owned and operated Miramar Landfill. The Miramar Landfill is located at 5180 Convoy Street and is operated by the ESD's Refuse Disposal Division. Refuse could also be taken to the Otay Landfill or Sycamore Landfill, which are currently owned and operated by Allied Waste Industries, a private waste management company that purchased the County of San Diego's solid waste system in 1997.

5.9.1.5 Electricity and Natural Gas

The site for the proposed project is in the San Diego Gas & Electric (SDG&E) service area. Using generation rates from the Greenhouse Gas Analysis (included as Appendix C of this EIR), assumptions were made to estimate the amount of electricity usage at the site. Per the greenhouse gas calculations under the baseline condition of the site being used as newspaper offices, the electricity usage at the site is approximately 4,557,235 kilowatt-hours (KWh) of electricity per year, and the natural gas usage at the site is approximately 8,446 million British thermal units (mmBTU) per year.

5.9.2 Issue 1

Issue 1: Would the proposed project result in the need for new systems or require substantial alterations to existing utilities, including those necessary for water, sewer, storm drains, solid waste disposal? If so, what physical impacts would result from the construction of these facilities?

5.9.2.1 Impact Analysis

According to the City of San Diego's Significance Determination Thresholds, impacts to public utilities would be considered significant if the project would:

- *Result in a need for new systems, or require substantial alterations to existing utilities (e.g., natural gas, sewer, communication systems, and solid waste disposal), the construction of which would create physical impacts;*
- *Result in the use of excessive amounts of fuel or energy (e.g. natural gas);*
- *Result in the use of excessive amounts of power;*
- *Use of excessive amounts of water; and,*
- *Use landscaping which is predominantly non-drought resistant vegetation.*

A. Water

The City of San Diego PUD receives the majority of its water supply from the MWD through the Water Authority. In addition, the MWD and the Water Authority have developed water supply plans to improve reliability and reduce dependence upon existing imported supplies. MWD's Regional Urban Water Management Plan (UWMP) and Integrated Resources Plan and the Water Authority's 2010 UWMP and annual water supply report include projects that meet long-term supply needs through securing water from the State Water Project, Colorado River, local water supply development, and recycled water. The Water Authority's 2010 UWMP provides for a comprehensive planning analysis at a regional level and includes water use associated with accelerated forecasted residential development as part of its municipal and industrial sector demand projections. The projected water demands for the proposed project are provided in Table 5.9-1 below.

Table 5.9-1
Projected Water Demands for Proposed Project

Buildings	Square Footage	Units/Employee	Gallons Per Day (gpd)	Acre Feet Per Year (AFY)
Multi-Family Units	-	200	49,600	55.55
Retail (Employees)	3,000	6	360	0.40
Swimming Pool	1,300	-	650	0.73
Projected Total			**50,610**	**56.68**

As shown in Table 5.9-1, the proposed project would result in a total water usage of approximately 56.7 AFY. According to SB 610 guidelines, a residential development project that would typically be subject to the parameters of SB 610 is one consisting of 500 dwelling units, where one dwelling unit typically consumes 0.3 to 0.5 acre-feet of water per unit per year. Per these guidelines, the water required for a 500 dwelling unit project would range from 150 AFY to 250 AFY. In addition, the City of San Diego has developed a water use metric of 88,000 gpd or 99 AFY for a 500 multi-family unit development. This metric represents a typical multi-family use of 80 gallons per person per day, for an average density of 2.2 people per household in each of the 500 units.

Based on the number of proposed residential units and square feet of retail space, the water usage for the proposed project is well below the 99 and 150 AFY thresholds. Therefore, the proposed project does not meet or exceed the Water Code §10912(a)(7) threshold requirements and would not trigger the need for a water supply assessment under the parameters of SB 610. As such, existing water supplies would be sufficient to serve the proposed project and no impact to the water supply is identified.

B. Wastewater

The sewer capacity analysis for the proposed project is based on the design requirements provided by the *City of San Diego's Sewer Design Guide*. Based on proposed conditions, the Peak Dry Weather Flow (PDWF) for the proposed project is 206,672 gallons per day (gpd) (0.320 cubic feet per second (cfs)), which is approximately 22 times more than the existing usage by the UT property of 9,300 gpd (0.014 cfs) of wastewater. According to the as-built plans for the existing UT property, the lift station was sized to pump 11,880 gpd of wastewater, which was based on the total number of fixture units (792 FU). Comparing the existing and proposed effluent flows indicate that the existing sewer lift station is grossly undersized for the proposed peak dry weather flows and will require upsizing to handle the 197,372 gpd increase.

Due to the existing parcel elevations within the San Diego River Basin and the pipe invert of the Mission Valley Trunk Sewer, a private lift, or pump, station is proposed as part of the project. The proposed private site gravity system will connect to a private lift station at the southwest corner of the property. All pump stations, private or public, must comply with the requirements of the *City of San Diego Sewer Design Guide*. While the exact details of the proposed pump station are not known at this time, an example of a typical pump station configuration used for this type of application is included Appendix H1 of this EIR. Potential foul odor created by the pump station may be mitigated by incorporating a sewer odor control check valve to the pump station's vent assembly. It is understood that the proposed pump station may require additional permits from the Development Services Department's structural, mechanical, and electrical disciplines.

The first branch is a proposed private 6-inch line that serves both towers. This gravity sewer line flows from east to west along the northern end of the property parallel to the river. Prior to the Town and Country property at the western property line the sewer turns 90 degrees where a proposed private 4-inch pipe, serving the townhomes, will connect. The effluent will proceed south via gravity lines to a proposed private lift station located at the Southwest corner of the property adjacent to Camino De La Reina.

The proposed private ejector pipe will join the existing private ejector pipe. The two sewer ejector pipes will utilize the same private connection to the existing 6-inch cast iron force main at the public right of way along Camino De La Reina.

C. Storm Drainage

The proposed drainage condition is similar to the existing drainage condition and is divided into 10 basins. Flow paths are similar to existing conditions and outfall either to the San Diego River or into the existing infrastructure within the adjacent road; Camino Del La Reina. The runoff from the existing Union Tribune Offices, which are to remain, will not be treated as it remains entirely separated from the proposed runoff prior to its discharge into the storm drain system.

- Basin P1 collects flows from the proposed 3.5-story parking structure as well as a portion of the driveway south of the parking garage. The basin sheet flows through proposed parking before concentrating into a proposed inlet. Flow is then routed into the bio-retention facility located directly west of the parking structure, across the drive aisle. All flow is eventually discharged into the San Diego River.

- Basin P2 includes flows from the proposed 3 townhomes where all flow sheet flows to area drains and is conveyed into a bio-retention facility. Flow is then discharged into the San Diego River through storm drain infrastructure.
- Basin P3 collects flows from the proposed walkway adjacent to the San Diego River where it is collected by a proposed inlet and is then discharged through riprap before entering the San Diego River.
- Basin P4 acts similar to Basin P3 where it collects flow in a proposed inlet adjacent to the San Diego River and is then discharged into rip rap before entering the San Diego River.
- Basin P5 collects the majority of flow from the project including flows from all proposed buildings except for the townhomes. The basin is divided up into 6 subbasins. 5 of the subbasins collect flow through proposed inlets before being routed through storm drain infrastructure into a large bio-retention facility. The other subbasin sheet flows across the proposed parking lot and is then collected by the same bio-retention facility. All treated flow is then routed through proposed storm drain into the existing 60" storm drain that runs along Camino De La Reina.
- Basin P6 is similar to Basin E6 and includes flow from the drive aisle of the eastern portion of Camino De La Reina along with the associated parking areas. Portions of the parking area will be modified by removing the existing building to the southwest, repaving the parking lot within the existing buildings footprint, and repainting the parking lot field. The runoff will be collected in three confluence points, each having a Jellyfish LID catch basin with a built-in high flow bypass. The flow will then enter an existing 12" RCP storm drain which ties into a drainage system within Camino De La Reina and ultimately discharges to the river downstream.
- Basin P7 slopes to the southwestern edge of the property. Flow will be conveyed via gutter to a Modular Wetland System (MWS) catch basin with built-in high flow bypass. The flow will then enter an existing 12" RCP storm drain which ties into a drainage system within Camino De La Reina, ultimately discharging to the river downstream.
- Basin P8 includes flows from the proposed 7-story building to the northwest of the project. The building flows, as well as a small portion of overland flow from the bike/pedestrian trail and fire lane, are conveyed to a MWS catch basin. The flow is then discharged into the San Diego River through storm drain infrastructure.
- Basin P9 sheet flows to a gutter where it concentrates and is routed via gutter into a MWS catch basin (just north of the Basin P1 bio-retention facility). Flow is then discharged into the San Diego River through storm drain infrastructure.
- Basin P10 collects a large portion of the driveway for the main entrance. The flow on the driveway sheet flows and collects into a gutter and is then conveyed to an MWS catch basin. Flow is then discharged from the MWS catch basin and into the San Diego River through storm drain infrastructure.

In accordance with City of San Diego requirements, the development of this property will include Best Management Practices (BMPs) to treat the runoff. The proposed water quality BMPs for the project are anticipated to include natural features such as bio-swales, bio-retention facilities, and porous pavers. See Section 5.11 Water Quality for more information.

The proposed project does not encompass the entire site and therefore all existing conditions that are remaining are not required to be treated. Existing drainage patterns would be maintained as much as practicable in the proposed condition. Four of the existing drainage discharge points were maintained while two new discharge points were added. Although some of the individual basin sizes changed from the existing condition to the proposed condition, the overall basin size was decreased to 8.49 acres. The runoff from the existing development that is to remain, which flows south toward Camino De La Reina, would not be treated as it remains entirely separated from the proposed runoff prior to its discharge into the storm drain system. Based on preliminary hydrology calculations, there would be a decrease in overall flow from 42.5 cubic feet per second (cfs) to 28.1 cfs as a result of the proposed project.

Within basins P1, P2, and P5, three bio-retention facilities would be sited in project landscape areas and will be accessed via storm drain infrastructure. The bio-retention facility located in basin P5 would consist of a vegetated swale. The overall flow (Q_{50}) for the proposed project would be reduced because of the decrease in impervious surface area and increase in permeability when compared to the existing condition. In addition, the overall flow would be reduced through the use of bioretention basins. Flows similar to the existing condition would be either reduced or routed to proposed bio-retention basins before ultimately discharging into the existing storm drain system, or directly into the San Diego River. During smaller storm events (2- and 5-year), bio-retention basins and filtration units would capture water and allow infiltration into engineered soils which will drain through a sub-drain and be conveyed into the storm drain. The infiltration rate of 5 inches per hour results in an increased time of concentration (Tc). For larger storm events (50- and 100-year), the initial flush would be retained while the additional flow would be routed through a properly sized outflow. Overall these facilities would treat and capture stormwater in order to reduce pollutants, increase time of concentration, and reduce the runoff volumes associated with the proposed project. Based on the Intensity-Duration-Frequency Curves developed for San Diego County, which can be found in the *Addendum to the Preliminary Drainage Study*, the increased time of concentration corresponds to a smaller intensity.

Within basin P6, three 4'x4' Jellyfish filter units will be placed in the locations of three existing catch basins serving the existing parking lot south of the UT printing facility. Due to size and infrastructure constraints within basins P7 through P10, Modular Wetlands Systems will be installed in order to treat drainage using a flow-based treatment involving internal bio-filters.

D. Solid Waste

A Waste Management Plan (WMP) (Appendix I of this EIR) has been prepared in coordination with the City's Environmental Services Department (ESD). As identified in the WMP and further discussed below, the proposed project anticipates 3,428 tons of demolition waste and 751 tons of construction waste for a total of 4,179 tons of waste. According to the City's Significance Determination Thresholds, a direct impact on solid waste facilities would occur if a project would generate 1,500 tons or greater of solid waste. As such, demolition and construction waste generated by the proposed project would exceed the thresholds, which is considered a direct impact. However, the demolition of concrete, asphalt, landscape debris and materials specified in Table 5.9-2 are expected to be 100% diverted from landfills either by reuses or source separating and sent to certified facilities. The goal of the proposed project development is to exceed the 75% diversion target for demolition and construction waste. The WMP estimates that of the 4,179 total tons of demolition and construction waste, approximately 90%, will be diverted. As a result, an estimated 344 tons of demolition and construction waste would end up going to landfill disposal, which is below the significance thresholds. These tonnages are only estimates based upon EPA assumptions and assuming depth of concrete and asphalt.

Table 5.9-2
Estimated Demolition Quantities & Tons Diverted

Material	Tonnage	Facility	Diversion Rate (%)	Tons Diverted	Tons Disposed
Asphalt	2,800	Hanson Aggregates West-Miramar	100	2,800	0
Brick	65	EDCO Recovery Transfer	70	45.36	19
Ceiling Tile	1	AMS San Diego	100	1	0
Ceramic/Porcelain	1	Enniss Incorporated	100	1	0
Concrete	113	Hanson Aggregates West-Miramar	100	113	0
Doors	1	Habitat for Humanity	100	1	0
Landscaping Debris	48	Miramar Greenery	100	48	0
Lighting Fixtures	1	Habitat for Humanity	100	1	0
Metal Waste	48	Pacific Steel	100	48	0
Mixed Debris	350	EDCO Recovery Transfer	70	245	105
Total	**3,428**			**3,303**	**124**

Source: Latitude 33, 2013.

With mandatory compliance with the City's waste management ordinances and implementation of the WMP, solid waste impacts associated with the proposed project would be reduced to a level less than significant. The following summarizes the WMP for this project.

Pre-construction

Mission Valley Holdings, LLC will assign a Solid Waste Management Coordinator (SWMC) for the proposed project. The SWMC will have the authority to provide guidelines and procedures for contractor(s) and staff to implement waste reduction and recycling efforts. These responsibilities are, but not limited to, the following:

1. Review and understand the WMP including responsibilities of SWMC.
2. Work with contractor(s) to estimate quantities of each type of material that will be salvaged, recycled, or disposed of as waste, then assist contractor(s) with documentation.
3. Review and update procedures as needed for material separation and verify availability of containers and bins needed to avoid delays.
4. Review and update procedures for periodic solid waste collection and transportation to recycling and disposal facilities.
5. Review and update solid waste management requirements for each trade.
6. Possess the Authority to issue Stop Work orders if proper procedures are not being followed.

From preconstruction to occupancy of the proposed project, the WMP (Appendix I of this EIR) will provide contractors and homeowners' guidelines to ensure the proper reduction, segregation, recycling, and disposal of demolition, construction, and on-going operational waste. Proper segregation of recyclable materials is required based on type of materials generated and the availability of recycling facilities able to accept those materials. This responsibility will be under the direction of the assigned proposed project SWMC.

The proposed project SWMC will coordinate with ESD and/or Mitigation Monitoring staff, including regular communication and invitations to the work site. An invitation shall be extended to an ESD representative at least seven days prior to attend each preconstruction meeting of each phase of the development.

Demolition and Construction Waste

The proposed project will require demolition including pavement, sidewalk, ramps, walls, buildings, roofing, and landscaping. The estimated tonnage was determined by using the City of San Diego C&D Debris Conversion Rate Table, which can be found in the WMP prepared for the proposed project. In order to mitigate for any solid waste impacts identified for the proposed project, offsite waste disposal shall target a minimum of 75% of all Construction, Demolition, and Land-Clearing waste to be diverted by weight from landfills.

Contractor Requirements. Mission Valley Holdings, LLC shall provide specific contract language for the proposed project to implement the WMP. The contract language will be made available to City personnel for verification. Contract language will require that:

- Specified demolition and construction materials will be reused or recycled onsite; others will be segregated for transport to specified recycling facilities.
- The contractor hired must determine the necessary capacity of dumpsters for each material type prior to obtaining the first demolition permit.
- The contractor(s) will be required to perform daily inspections of the demolition/construction site to ensure compliance with the requirements of the WMP and all other applicable laws and ordinances and report directly to the proposed project SWMC.
- Daily inspections will include verifying the availability and number of dumpsters based on amount of debris being generated, assuring correct labeling of dumpsters, proper sorting and segregation of materials.
- No more than 10% by volume of contamination may occur in each dumpster.
- The contractors and subcontractors will coordinate and work closely with the SWMC to minimize the over-purchasing of construction materials to lower the amount of materials taken to recycling and disposal facilities. Ways in which the project will minimize over-purchasing is to purchase pre-cut materials, work closely amongst designers, contractors, and suppliers.

Salvage. Prior to demolition, the SW coordinator will clearly label all building materials targeted for reuse. The proposed project anticipates reusing 100% of the concrete and asphalting demolition on-site. When reuse is not possible, the materials will be deposited into clearly labeled, material specific containers for removal to an appropriate facility certified to achieve 100% diversion, as outlined in Table 5.9-2. An additional three (3) tons of salvage for re-use will include:

- Approximately 1,000 light fixtures (each weighing approximately 2 pounds).
- Approximately 250 doors and door hardware (each weighing approximately 8 lbs).
- Approximately 2,500 ceiling tiles (each weighing approximately 0.8 lbs).

Segregation of Demolition Debris for Recycling. In addition to the salvage for reuse described above, four materials will be segregated from the mixed debris for recycling/composting at a recycling/composting facility achieving 100% diversion:

- Landscape debris.
- Metal waste.
- Ceramic tiles and porcelain waste.
- Carpet waste.

It is expected that approximately 94% of the material generated from the proposed projects demolition will be diverted by salvaging or source separating the asphalt, concrete, landscape debris and other materials noted in Table 5.9-2 above. Tonnage of each material is subject to change based upon contractor actual data. Mission Valley Holdings may utilize the Certified Facilities list found in the WMP. Earthwork is expected to balance on-site.

Construction Waste. During construction of the proposed project, the construction debris generated is expected to include the materials listed in Table 5.9-3. Materials shall be source separated as indicated in Table 5.9-3.

Table 5.9-3
Estimated Construction Waste

Expected Bin Capacity Needed	Material Type	Generated (tons)	Handling	Diverted	Disposed
One 40-yard bin, will require service about 5 times.	Clean Wood (Forming and framing lumber)	7	Clean Wood (Forming and framing lumber)	7	0
One 40-yard bin, will require Service about 3 times.	Metals (Pipes, rebar, flashing, steel, aluminum, copper, brass, stainless steel)	3.25	Pacific Steel, for example.	3.25	0
One 40-yard bin, will require service a couple of times.	Polystyrene	1.5	Cactus Recycling	1.5	0
Two 40-yard bins, will require weekly service.	Blocks, bricks	37	Enniss Incorporated, for example.	37	0
Two 40-yard bins, will require Weekly service.	Asphalt, concrete	37	Enniss Incorporated, for example.	37	0
Two 40-yard bins, will require weekly service.	Trash (Treated wood)	36	Miramar Landfill	0	36
One 40-yard bin, will require service about 4 times.	Roofing	7	LEED Recycling	7	0
At least four 40-yard bins, will require weekly service.	Mixed Debris (Insulation, vinyl, doors, floor tile, plastic pipes, film, broken glass, drywall)	612	SANCO/EDCO Recovery & Transfer Facility	428	183
One 40-yard bin, will require service a couple of times.	Cardboard	3.25	Cactus or IMS	3.25	0
One 40-yard bin, will require service about 5 times.	Carpet/Carpet padding	7	DFS Flooring, for example	7	0
Totals		**751**		**531**	**220**

Source: Latitude 33, 2013.

The City of San Diego ESD requires projects to estimate tonnage of expected construction waste. The proposed project includes a total of 500,714 square feet of new construction. As provided by the ESD, the proposed project utilizes the Environmental Protection Agency (EPA), 3 pounds of waste per square foot for waste generation on new construction to calculate expected tonnage as follows: 500,714 sq. ft. x 3/2,000 lbs = 751 tons.

The 751 tons is an assumption and is used as a placeholder until further detail is provided and the contractor can accurately assess expected waste. Further, the exact quantity of each material is unknown at this time. As a placeholder, the proposed project contractors shall source separate waste materials according to the material types in Table 5.9-3.

Based on these estimates, and on providing segregation of these materials, the project would accomplish approximately 70% diversion of construction waste. When construction waste is considered together with demolition waste, 4,179 tons of demolition and construction waste would be generated, but approximately 90% is expected to be diverted from disposal. An estimated 344 tons would end up going to landfill disposal. To ensure this result, contractors will be required to comply with the following methods and procedures below:

1. Construction and Land-Clearing containers will be provided for waste that is to be recycled. Containers shall be clearly labeled, with a list of acceptable and unacceptable materials. The list of acceptable materials must be the same as the materials recycled at the receiving material recovery facility or recycling processor.
2. The collection containers for recyclable Construction and Land-Clearing waste must contain no more than 10% non-recyclable materials, by volume.
3. Use detailed material estimates to reduce risk of unplanned and potentially wasteful material cuts.
4. Conduct daily visual inspections of dumpsters and recycling bins to remove contaminants.
5. Remove demolition and construction waste materials from the project site at least once every week to ensure no over-topping of waste bins. The accumulation and burning of on-site Construction, Demolition, and Land-Clearing waste materials will be prohibited.

Furthermore, the proposed project will be required to meet the following State law and City of San Diego Municipal Code requirements:

1. The City's C&D Debris Diversion Deposit Program which requires a refundable deposit based on the tonnage and value of the expected recyclable waste materials as part of the building permit requirements.
2. The City’s C&D Recycling Ordinance which requires identification and sorting of demolition and construction waste materials to be diverted to the appropriate recycling facility.
3. The City’s Recycling Ordinance which requires that collection of recyclable materials must be provided.
4. The City’s Storage Ordinance which requires that areas for recyclable material collection must be provided.
5. Waste Management Plan – The waste contractor will provide monthly reports regarding the amount of waste and recyclable materials to the proposed project SWMC who will be responsible for compliance actions with the aforementioned guidelines and make adjustments as needed to maintain conformance. The name and contact information of the waste contractor and SWMC will be provided to ESD at least 10 days prior to the start of any work and updated within 5 days of any changes.

Occupancy Waste

The proposed project development will be managed under Mission Valley Holdings, LLC. During the Occupancy Phase, it is estimated that 149 tons per year will be generated by the new development (Refer to Table 5.9-4). The expected waste generation was calculated using the City of San Diego ESD Waste Generation Factors and information obtained from CalRecycle as shown in Table 5.9-4.

Table 5.9-4
Waste Generation – Occupancy Waste

	Square Footage/Units	Generation Factor	Tons Per Year
Proposed Residential	200	4lb/unit/day	146
Proposed Retail	3,000	2.5lb/1,000sq.ft/day	3
Total			**149**

Source: Latitude 33, 2013.

The proposed project will be required to comply with City of San Diego Municipal Code Section 142.0830 Refuse and Recyclable Material Storage Regulations for Residential and Non-Residential Development (Table 142.08B & 142.08C). The minimum storage amount required can be found in Tables 5.9-5 and 5.9-6 below.

Table 5.9-5
Minimum Exterior Refuse and Recyclable Material Storage Areas for Residential Development

Dwelling Units	Minimum Refuse Storage Area Per Development (square feet)	Minimum Recyclable Material Storage Area Per Development (square feet)	Total Storage Required (square footage)
200	384	384	768

Source: Latitude 33, 2013.

Table 5.9-6
Minimum Exterior Refuse and Recyclable Material Storage Areas for Non-Residential Development

Gross Floor Area	Minimum Refuse Storage Area Per Development (square feet)	Minimum Recyclable Material Storage Area Per Development (square feet)	Total Storage Required (square footage)
3,000	12	12	24

Source: Latitude 33, 2013.

In order to continually reduce waste delivered to the landfill during the life of the project, trash, recycling, and green waste bins will be provided for each development. Information will be provided to residents to encourage recycling of all paper products, cardboard, glass, aluminum cans, recyclable plastics, and yard waste.

Compliance with the recycling ordinance, which requires the provision of educational materials and separate recycling bins, and with the storage ordinance, which requires that sufficient space for recycling bins be provided, is

estimated to reduce waste by 40%. Thus 89.4 tons per year would still be destined for disposal. The proposed project would provide the following measures to help mitigate this quantity of trash:

- Ensuring that landscape debris is minimized, used onsite when possible, and what remains is composted.
- Surpassing the 75% waste reduction target during demolition and construction.

E. Electricity and Natural Gas

As discussed previously, the proposed project is in the service area of SDG&E. Once the project is fully operational it is expected to use approximately 952,850 kilowatts per hour (KWh) of electricity per year. This represents a difference of approximately 3,604,385 KWh of electricity per year compared to the electricity used at the site under the baseline of 4,557,235 KWh per year. Additionally, the project would use approximately 5,004.4 mmBTU of natural gas per year, resulting in a net decrease of approximately 3,441.6 mmBTU used at the site per year compared to existing uses.

5.9.2.2 Significance of Impact

A. Water

As documented in the Water Authority's 2010 UWMP, the Water Authority is planning to meet future and existing demands which include the demand increment associated with the accelerated forecasted growth. In addition, the next update of the demand forecast for the Water Authority's 2015 UWMP will be based on SANDAG's most recently updated forecast, which will include the proposed project. Furthermore, the proposed project does not meet or exceed the Water Code §10912(a)(7) threshold requirements and would not trigger the need for a water supply assessment under the parameters of SB 610. Therefore, the proposed project would not use excessive amounts of water nor would it result in a need for new water systems, or require substantial alterations to existing water utilities, and impacts to the water supply would be less than significant.

B. Wastewater

The proposed project will generate effluent flows from 16.2 acres of retail, office, and 200 dwelling units. The total effluent flow, under peak conditions, has been calculated at 0.206 million gallons per day (MGD) (206,672 gpd). Gravity sewer lines have been designed to achieve a minimum slope of 1.0%, with velocities not exceeding 10 feet per second (fps), and capacity not exceeding 50%.

The sewer capacity analysis has analyzed both the existing and proposed effluent generation based on existing flows from the UT property, proposed flows based on land use, and as-built plans. Calculations are provided in the Preliminary Sewer Study and Wastewater Addendum to show, in the proposed condition, adequate design slope, velocity, and pipe capacity.

Due to the existing parcel elevations within the San Diego River Basin and the pipe invert of the Mission Valley Trunk Sewer, a private lift station is proposed to alleviate the increase in effluent flow from the redevelopment. The proposed private site gravity system flows from east to west along the northern end of the property parallel to the river and will connect to a private lift station at the southwest corner of the property. The old lift station will be removed and a new connection to the existing 6-inch cast iron force main will be made. The proposed private ejector pipe will

join the existing private ejector pipe. The two sewer ejector pipes will utilize the same private connection to the existing 6-inch cast iron force main at the public right of way along Camino De La Reina. The force main will continue undisturbed through Camino De La Reina connecting to the Mission Valley Trunk Sewer as it does currently. As such, the proposed project would not result in a need for new off-site sewer systems, or require substantial alterations to existing sewer utilities, and impacts would be less than significant.

C. Storm Drainage

The total site discharge has been controlled by decreasing the impervious surface, and by routing existing and proposed flows to bio-retention facilities, which increases the time of concentration providing smaller intensities. Since the overall flow has decreased, no mitigation of downstream storm drain improvements is anticipated.

The flows associated with Camino De La Reina have increased due to the dedication/widening of the road, but because the overall flows have been decreased within the infrastructure, no mitigation of downstream storm drain improvements are anticipated.

Since the limits of the overall drainage basin have decreased, and the overall runoff from the site has decreased, the proposed project would not have an adverse effect on the existing drainage condition. In addition, there are no known existing drainage issues for or adjacent to this project site. As such, the proposed project would not result in a need for new stormwater systems, or require substantial alterations to existing utilities. Therefore, impacts would be less than significant.

D. Solid Waste

The proposed project anticipates the generation of approximately 3,428 tons of demolition waste and 751 tons of construction waste for a total of 4,179 tons of waste, which would exceed the City's thresholds for direct impacts to solid waste facilities. As such, a WMP has been prepared for the proposed project in coordination with the City's ESD. According to the WMP, the demolition of concrete, asphalt, landscape debris and materials specified in Table 5.9-2 are expected to be 100% diverted either by reuses or source separating and sent to the certified facilities mentioned above. Mission Valley Holdings, LLC uses several certified facilities; the facility used is subject to change at the discretion of the WMC, provided the facility used attains the same or better certified waste diversion rate. The goal of the proposed project development is to exceed the 75% diversion target for demolition and construction waste. The WMP estimates that of the 4,179 total tons of demolition and construction waste, approximately 90% will be diverted. As a result, an estimated 344 tons of demolition and construction waste would end up going to landfill disposal, which is below the significance threshold. These tonnages are only estimates based upon EPA assumptions and assuming depth of concrete and asphalt.

To ensure that waste is properly managed, Mission Valley Holdings, LLC shall establish waste management contract language ensuring:

- Demolition and construction materials will be reused or recycled onsite, others will be segregated as specified in Tables 5.9-1 and 5.9-2 for transport to specified recycling facilities.
- Sufficient number of bins are provided, properly used, and their contents taken to appropriate facilities.

- Daily inspections occur to prevent overflow, assuring correct labeling of dumpsters, and that no more than 10% by volume of contamination occurs in each bin.
- Over-purchasing of construction materials is minimized.
- That the materials identified in the WMP for salvage (concrete, asphalt, landscaping debris, metal waste, ceramic tiles, porcelain waste, and carpet and padding waste) are either used onsite, or arrangements are made to take them to an off-site facility for reuse.

Mission Valley Holdings, LLC will ensure that the ESD is included in the preconstruction meeting prior to demolition activities to verify these project features and contract language. Additionally, prior to occupancy, Mission Valley Holdings, LLC will ensure that the ESD has an opportunity to review and approve the educational materials prepared for the tenants pursuant to the Recycling Ordinance.

Mission Valley Holdings, LLC is committed to establishing recycling guidelines throughout the Preconstruction, Construction, and Occupancy phases. A WMC will be assigned to the proposed project. The Coordinator will ensure compliance with the San Diego Municipal Code, Recycling Ordinance, Refuse, Construction and Demolition Recycling Ordinance, and Recyclable Materials Storage Regulations and aim to exceed the 75% diversion goal for demolition and construction waste by providing appropriate salvage, segregation, and recycling.

With mandatory compliance with the City's waste management ordinances and implementation of the WMP (Appendix I of this EIR), solid waste impacts associated with the implementation of the proposed project would be reduced to a level less than significant.

E. Electricity and Natural Gas

The proposed project would result in a net change of approximately 3,604,385 KWh of electricity per year, and a net change of approximately 3,441.6 mmBTU of natural gas per year. As such, the proposed project would use less electricity and natural gas compared to the existing uses of the site. As such, the proposed project would not result in the use of excessive amounts of fuel, energy or power. Per the City's Significance Thresholds, SDG&E continuously forecasts future energy demands to ensure that infrastructure capacity can meet demand. Where projects with large power loads are planned, these new large power loads are considered by SDG&E together with other existing or anticipated future loads in the project vicinity, and electrical substations are upgraded or new substations are built if the capacities of existing substations are exceeded. Impacts would therefore be less than significant.

5.9.2.3 Mitigation, Monitoring, and Reporting

Implementation of the proposed project would not result in any significant impacts to public utilities, including water, wastewater, storm drainage, solid waste, and electricity and natural gas. Therefore, no mitigation measures are required.

5.9.2.4 Impacts After Mitigation

No mitigation is required; therefore there would be no impact after mitigation.

5.9.3 Conclusion

The proposed project would not result in any significant impacts to public utilities, including water, wastewater, storm drainage, and electricity and natural gas. In addition, the proposed project would not result in the need for new systems or require substantial alterations to existing utilities or infrastructure. A potentially significant solid waste impact has been identified with the implementation of the proposed project. However, with mandatory compliance with the City's waste management ordinances and implementation of the WMP that has been prepared for the proposed project, this impact would be reduced to a level less than significant.

5.10 Visual Effects/Neighborhood Character

The information and analysis in the following discussion have been compiled based on site visits, photos, and visual renderings of the project area. Additionally, pertinent documents were reviewed, including the *City of San Diego Municipal Code* (2006, 2013), *City of San Diego General Plan (City, 2008)*, *Mission Valley Community Plan (City, 1985)* and the *San Diego River Park Master Plan (City, 2013)*. Visual renderings were prepared to analyze the proposed project's visual impact.

5.10.1 Existing Conditions

As discussed in EIR Chapter 2.0, the project is located within a densely urbanized area and in the heart of Mission Valley directly adjacent to the San Diego River. The topography of the site is relatively flat and ranges from an elevation of approximately 28 feet above mean sea level (AMSL) to approximately 40 feet AMSL.

A. On-Site Land Use

The proposed project site is 12.86 acres located immediately north of Camino De La Reina, west of State Route 163, and east of Fashion Valley Road at 350 Camino De La Reina in San Diego, California. The existing land uses consist of office and general light industrial (manufacturing), and it is utilized as the Mission Valley headquarters of the San Diego Union-Tribune (UT). The site consists of a 1-story (2,474 square foot [sf]) automotive service center, 5-story (168,575 sf) commercial UT office building, a 3-story (191,600 sf) UT Printing Facility, and a surface parking lot which is located to the south of the existing buildings. Two driveway entrances are located along Camino De La Reina and mature trees are scattered along the perimeter of the property. Existing on-site photo viewpoints are shown in Figure 5.10-1. Figures 5.10-2 through 5.10-4 depict the existing conditions of the proposed project site from various angles along Camino De La Reina. As depicted in Figures 5.10-2 through 5.10-4, the existing project site appears to be relatively level with slight variations in elevation from all public viewpoints. The site contains an existing retaining wall along the western side of the site, which is not visible from the public right-of-way. The site is currently zoned MVPD-MV-I (Industrial), but also includes a relatively small, 850 sf portion of the northeast corner zoned OF-1-1 (Open Space—Floodplain), which includes part of the 35-foot buffer from the San Diego River 100-year floodway.

B. Off-Site Land Use

As further discussed in Section 5.1 of this EIR, and illustrated in Figure 1-2 and Figure 1-3 of this EIR, existing development, transportation corridors and the San Diego River surround the project site. The project site is immediately bordered by Camino De La Reina to the south and east, the San Diego River (Multiple Habitat Preservation Area [MHPA]) to the north, retail and high density residential north of the San Diego River, and hotel/motel uses to the west. Just opposite Camino De La Reina to the south is Interstate 8 (I-8) and to the east is State Route 163 (SR-163). The MHPA in this area primarily consists of the area within the river and its immediate surrounds. The purpose of the MHPA is to preserve the land; however, passive recreational uses are allowed within the designated area. The elevation of the property varies but does not contain any steep terrain, similar to the elevation of the surrounding developed properties. The San Diego River to the north has a base flood elevation of +36.00', which portions of the existing site currently lie below, and are considered part of the floodplain. As depicted in Figure 5.10-4, the San Diego River is primarily obstructed by vegetation from the public right-a-way along Camino De La Reina. I-8 and SR-163 vary in height and wrap around the project site. Due to the structural congestion

SOURCE: Esri, 2014; BRG Consulting, 2014

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Photo Viewpoints

FIGURE 5.10-1

SOURCE: BRG Consulting, 2013

12/17/13

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Existing Conditions (Photos 1&2)

FIGURE

5.10-2

SOURCE: BRG Consulting, 2013

12/17/13

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Existing Conditions (Photos 3&4)

FIGURE

5.10-3

SOURCE: BRG Consulting, 2014

4/17/14

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Existing Conditions (Photo 5)

FIGURE

5.10-4

of the freeway interchange and the vegetation surrounding the proposed project site, views of the existing project site from SR-163 and I-8 are minimal and mostly obstructed from the freeway. Additionally, due to the operational congestion at the interchange, drivers are more focused on the roadway interactions than surrounding visual landscape opportunities.

C. Neighborhood Character

As further discussed in Section 5.1 of this EIR, the project site is located in the Mission Valley Community Planning Area of the City General Plan. The project site has a General Plan Land Use Category of Industrial Employment. The Mission Valley Community Planning Area encompasses approximately 2,418 acres and is characterized as a commercial, retail, office, hotel/motel, and residential based, regional employment center. The nearby residential uses consist predominately of vertical multiple unit structures up to four-stories in height.

D. Light, Glare, and Shading

The project site is located in a built-up area where night lighting is a common feature. Light sources in the area include street lights, building lights, illuminated signs, security lighting, sidewalk lighting, and parking lot lighting. The existing lighting in the area is in compliance with all applicable City laws and regulations. The subject property is not shaded by any structures, and there is no substantial glare in the project area.

E. Local Regulations

Height Regulations

The project site is zoned as Industrial, which allows a mix of open space, live/work quarters, retail sales, commercial services, and offices. According to Section 131.0644 of the City's Municipal Code, there are no maximum height limits for structures except as limited by the regulations set forth by Overlay Zones, which depicts a height limit of 250' for the proposed project site. According to the San Diego River Park Master Plan, light elements illuminating the river should not exceed 12 feet in height and the proposed building shall be set back more than 115-feet from the river and comply with the underlying zone. The project site is located within the Airport Land Use Compatibility Overlay Zone (Montgomery Field); the Airport Influence Area (Montgomery Field Review Area 2); the Federal Aviation Administration (FAA), Part 77, Noticing Area; the Montgomery Field Overflight Notification Area; Montgomery Field Safety Zone; and the Mission Valley Community Plan.

Fencing Regulations

Fencing within the City is controlled by the City's Fencing Regulations per Section 142.0300 of the City Municipal Code and the Mission Valley Planning Development Ordinance for the River Sub-district. The purpose of these regulations is to maintain adequate visibility on private property and in public rights-of-way, to maintain the openness of front and street side yards, to protect the light and air to abutting properties, and to provide adequate screening by regulating the height, location, and design of fences and retaining walls. Any retaining wall with a height of 3 feet or greater shall comply with Sections 142.0340, 142.0370, and 142.0380, and obtain a building permit. Section 1514.0302(c) of the Mission Valley Planning Development Ordinance for the River Sub-district states that fences shall be provided only as required to protect sensitive habitat, shall be natural peeler log fencing with a maximum height of 4 feet, and fences shall be placed on the 100-year flood boundary or a minimum of 5 feet from the San Diego River Pathway or trails if necessary to protect sensitive habitat.

Lighting Regulations

Lighting within the City is controlled by the City's Outdoor Lighting Regulations per Section 142.0740 of the City Municipal Code. The City's Outdoor Lighting Regulations are intended to provide public safety, conserve energy, and protect surrounding land uses as well as astronomical activities at the Palomar and Mount Laguna observatories from excessive light generated by new development. The project site is not located in close proximity (within 30 miles) to the Palomar and Mount Laguna observatories and therefore, regulations pertaining to these observatories are not applicable. The applicable Outdoor Lighting Regulations, as amended by Ordinance No. O-20186 dated July 31, 2012 requires that:

- Outdoor lighting fixtures shall be installed in a manner that minimizes negative impacts from light pollution, including light trespass, glare, and urban sky glow in order to preserve enjoyment of the night sky and minimize conflict caused by unnecessary illumination.
- Regulation of outdoor lighting is also intended to promote lighting design that provides for public safety and conserves electrical energy.
- It is the intent that, in addition to the regulations set forth in Section 142.0740, outdoor lighting fixtures shall be installed and operated in compliance with the following regulations, to the extent applicable:
    - California Energy Code, California Code of Regulations, Title 24, Part 6
    - Green Building Regulations (Chapter 14, Article 10); and,
    - Electrical Regulations (Chapter 14, Article 6).
- All outdoor lighting, including search lights, shall be turned off between 11:00 P.M. and 6:00 A.M. except:
    - Outdoor lighting may remain lighted for commercial and industrial uses that continue to be fully operational after 11:00 P.M. such as sales, assembly, and repair; and for security purposes or to illuminate walkways, roadways, equipment yards, and parking lots subject to the following:
        - Adequate lighting for public safety shall be maintained. Outdoor lighting shall otherwise be reduced after 11:00 P.M. where practicable.
- Outdoor lighting for the following is permitted to remain lighted after 11:00 P.M. and is exempt from the maximum Kelvin CCT and maximum lumen requirements specified in Section 142.0740(c)(4) and (c)(5)(A):
    - Outdoor lighting used to illuminate recreational activities that are not in residential zone may continue after 11:00 P.M. only when equipped with automatic timing devices and shielded to minimize light pollution.
    - Illuminated on-premises signs for business that are open to the public after 11:00 P.M. may remain lighted during business operating hours only. Illuminated off-premises advertizing display signs shall not be lighted after 11:00 P.M. Signs located both on- and off-premises shall be equipped with automatic timing devices.

Glare Regulations

Glare within the City is controlled by City Municipal Code 142.0730 (Glare Regulations). The City's Glare Regulations include the following:

- A maximum of 50 percent of the exterior of a building may be comprised of reflective material that has a light-reflectivity factor greater than 30 percent.

5.10.2 Issue 1

Issue 1: Would the proposed project create any substantial obstruction of any vista or scenic view from a public viewing areas identified in the community plan?

5.10.2.1 Impact Analysis

According to the City of San Diego Significance Determination Thresholds, impacts to scenic vistas or views from public viewing areas may be considered significant if the project would:

- *Substantially block a view through a designated public view corridor as shown in an adopted community plan, the General Plan, or the Local Coastal Program. Minor view blockages would not be considered to meet this condition. In order to determine whether this condition has been met, consider the level of effort required by the viewer to retain the view;*
- *Cause substantial view blockage from a public viewing area of a public resource that is considered significant by the applicable community plan. Unless the project is moderate to large in scale, condition "c" would typically have to be met for view blockage to be considered substantial;*
- *Exceeds the allowed height or bulk regulations, and this excess results in substantial view blockage from a public viewing area; and/or,*
- *Have a cumulative effect by opening up a new area for development, which would ultimately cause " extensive" view blockage.*

The City of San Diego General Plan includes the following goals, which are analyzed below:

- *Protect views from public roadways and parklands to natural canyons, resource areas, and scenic vistas.*
- *Preserve views and view corridors along and/or into waterfront areas from the public right-of-way by decreasing the heights of buildings as they approach the shoreline, where possible.*
- *Provide public pedestrian, bicycle, and equestrian access paths to scenic view points, parklands, and where consistent with resource protection, in natural resource open space areas.*
- *Design and site buildings to permit visual and physical access to the natural features from the public right-of-way.*

A. Public Views of the Proposed Project Site

From Public Roadways

The proposed project site is located within a developed area and is situated at the intersection of SR-163, I-8, and the San Diego River, amongst various office/industrial structures and trees. As depicted in the visual renderings of the proposed project provided in Figures 5.10-5 through 5.10-7, the proposed project would include two multi-family residential buildings/parking structure (4-stories to be located on a below-grade level and first three levels of one of the residential buildings), conversion of 3,000 square feet of the ground floor area of the existing UT print building to retail amenity space, and the implementation of the San Diego River Park and public pocket park.

Figure 5.10-8 identifies the public viewpoints (VP-6 through VP-10) considered during the evaluation of the proposed project aesthetic impacts. The existing conditions photos from such viewpoints are shown in Figures 5.10-9 through 5.10-10. Although the proposed project site is located amongst various potential public viewing points, the proposed project would be mostly obstructed from VPs 7, 8, and 9, due to existing intervening structures, landform, and dense mature vegetation. The existing buildings at the UT site are minimally visible from these viewpoints due to various obstructions. The proposed project would not significantly exceed the height of the existing structures within the project site. The minimal amount of existing structure that is visible, depicted in the existing conditions photos from VP 7, 8 and 9 on Figures 5.10-9 and 5.10-10, would block most of the view to the proposed project. Therefore, the proposed project would not be noticeable from VPs 7, 8, or 9.

The proposed project is potentially visible from VP-6 (SR-163 north) and VP-10 (Camino De La Reina). Visual simulations of the proposed project were completed for both viewpoints. Figures 5.10-11 and 5.10-12 below, depict visual simulations of the proposed project from VP-6 (SR-163 north) and VP-10 (Camino De La Reina) as viewed by a driver or pedestrian approaching the proposed project site. The top photo from each viewpoint depicts views towards the proposed project site. These Google Earth images were then used to create the bottom visually simulated imagery depicting the view with implementation of the proposed project.

As shown in Figure 5.10-11, views from VP-6 (SR-163 north) would be minimal due to the significant distance and obstructing features (i.e. existing development, roadway infrastructure, landforms, and mature vegetation) between the viewer and the proposed project. In addition, the color of the building blends in with the existing surrounding buildings and the hillside that lies directly north of the site, which makes the new buildings difficult to see when driving north on the 163.

As shown in Figure 5.10-12, the proposed project is visible to vehicle occupants on Camino De La Reina as they approach the project site. However, the proposed project would not obstruct any views towards any existing scenic viewsheds from this viewpoint and the proposed project color scheme would visually blend with the surrounding development.

As demonstrated by the simulations, the proposed project would not substantially block any of the viewsheds provided by public right-of-way surrounding the proposed project, because the proposed project would be mostly obscured by the existing development, roadway infrastructure, and mature vegetation. Also, the proposed project would be obscured with vegetation from the existing Metropolitan Transit System (MTS) Trolley Tracks, which are located across the San Diego River from the proposed project. Additionally, the proposed project would not obstruct any scenic view corridors identified in the Mission Valley Community Plan, the General Plan, or the Local Coastal Program, because the project site is not located within any scenic corridors. The proposed project would not be visible from any existing public park areas.

SR-163 is designated a scenic highway between I-5 and I-8. The proposed project site is located within the northwest corner of the I-8 and SR-163 interchange and is not located within the part of a scenic viewshed from SR-163 between I-5 and I-8. Also, I-8 is eligible to be designated as a scenic highway, but has not yet been designated.

SOURCE: AVRP, 2014

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Architectural Renderings

FIGURE

5.10-5

SOURCE: AVRP, 2014

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Architectural Renderings

FIGURE

5.10-6

SOURCE: AVRP, 2014

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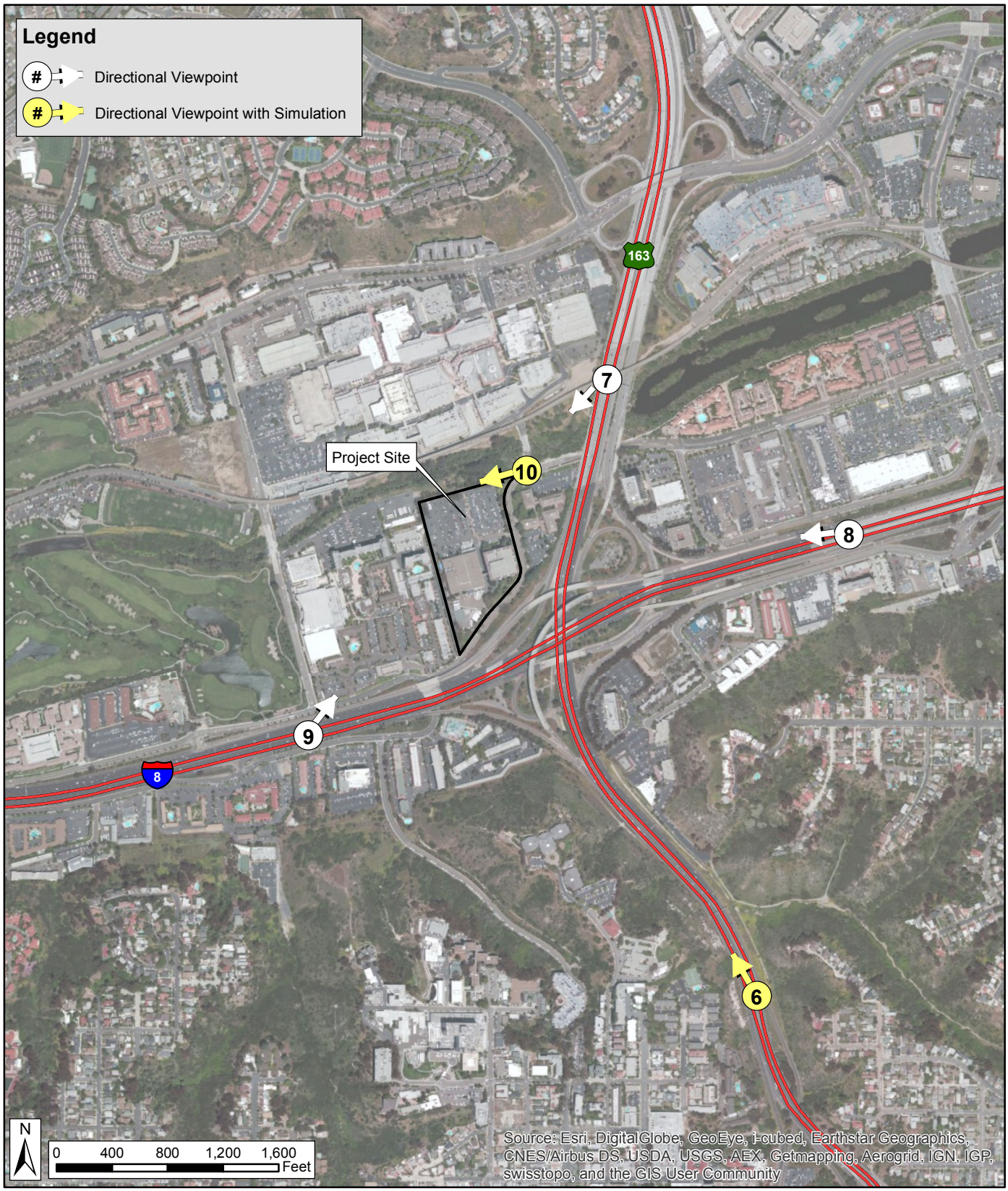
Architectural Rendering

FIGURE

5.10-7



SOURCE: BRG Consulting, 2014

11/25/14

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Union Tribune Mixed Use Project EIR

Public Viewpoints

FIGURE 5.10-8

SOURCE: AVRP, 2014; BRG Consulting, 2014

11/24/14

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Union Tribune Mixed Use Project EIR

Existing Photo Settings (VP-6, VP-7, VP-8)

FIGURE

5.10-9

SOURCE: AVRP, 2014; BRG Consulting, 2014

11/24/14

BRG CONSULTING INC

Union Tribune Mixed Use Project EIR

Existing Photo Settings (VP-9 and VP-10)

FIGURE

5.10-10

SOURCE: AVRP, 2014; BRG Consulting, 2014

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Existing and Proposed Views
from Viewpoint 6 (SR-163 North)

FIGURE
5.10-11

SOURCE: AVRP, 2014; BRG Consulting, 2014

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Existing and Proposed Views
from Viewpoint 10 (Camino De La Reina)

FIGURE

5.10-12

The proposed project would be relatively similar in height and bulk of the existing and adjacent development. The proposed project would not result in substantial view blockage from a public viewing area as discussed above. Also, the proposed project includes the development of two residential structures, parking structures, retail amenity space, a public pocket park, San Diego River Park Pathway, and extensive landscaping and hardscaping throughout the site; therefore, no vacant land would remain within the proposed project site with implementation of the proposed project. Therefore, the proposed project would not pose a cumulative effect by opening up a new area for development, which may ultimately cause "extensive" view blockage.

Public Views From the San Diego River

The view from the San Diego River to the proposed project site is obstructed by native riparian vegetation associated with the river. The San Diego River Park Master Plan identifies a San Diego River Pathway adjacent to the River, which would include designated scenic viewpoints facilitating views towards the river. The proposed project would provide a portion of the planned San Diego River Pathway between the proposed buildings and the River and include public scenic overlooks that would face towards the river and away from the proposed development.

Public Views of the San Diego River

The San Diego River is considered a scenic resource; however, due to the existing development and native riparian vegetation associated with the river, the San Diego River is mostly obstructed from the existing public viewsheds (e.g. views from Camino De La Reina, I-8 and SR-163). The proposed project would provide a twenty-foot wide San Diego River Pathway and a public pocket park that provides public views of the river. Along the San Diego River Pathway, three scenic/overview areas are provided with seating and interpretive panels that educate the public on the river, which are consistent with the San Diego River Park Master Plan (City, 2013). In an effort to preserve and enhance views of the San Diego River, the proposed project's San Diego River Pathway would provide more than 50 percent visual openings to the river frontage, as it would be consistent with the San Diego River Park Master Plan Guideline 4.3.4.7. The proposed project area is not located within the intended viewsheds of the scenic/interpretive overlooks. The proposed project would increase number of public viewsheds of the San Diego River.

5.10.2.2 Significance of Impact

Since the project would increase public viewing opportunities of the San Diego River, does not lie within a designated scenic viewshed, and would not substantially obstruct any public views of the San Diego River, impacts to public views would be less than significant.

5.10.2.3 Mitigation, Monitoring, and Reporting

No mitigation measures would be required.

5.10.2.4 Impacts After Mitigation

The proposed project does not lie within a designated scenic viewshed and would pose less than significant adverse impacts to the existing public viewsheds within the area.

5.10.3 Issue 2

Issue 2: Would the proposed project result in the creation of a negative aesthetic site or project?

5.10.3.1 Impact Analysis

According to the City of San Diego Significance Determination Thresholds, impacts to aesthetics/ neighborhood character may be considered significant if the project would:

- *Create a disorganized appearance and would substantially conflict with City codes;*
- *Significantly conflict with the height, bulk, or coverage regulations of the zone and does not provide architectural interest;*
- *Includes crib, retaining or noise walls greater than six feet in height and 50 feet in length with minimal landscape screening or berming where the walls would be visible to the public;*
- *Be large and result in exceeding monotonous visual environment; and/or,*
- *Includes shoreline protection device in a scenic, high public use area, unless the adjacent bluff areas are similarly protected.*

The proposed project is a mixed-use project that incorporates the City's development design goals and policies for the proposed site, resulting in an aesthetically pleasing contemporary design. The proposed project incorporates urban design with vertical expansion to accommodate increased density and provide needed housing units and office/commercial uses. The design of the structures within the site are relatively the same bulk with slight variances in height. Architectural projections are proposed, which create a more aesthetically pleasing overall visual experience. The overall appearance would not appear disorganized because the structural style, building materials, and color scheme would be similar. The proposed project also incorporates architectural projections and off-setting planes creating an aesthetically pleasing visual contrast and avoiding monotony within the site.

The project proposes a public pocket park and the San Diego River Pathway on the northern boundary of the project. The public pocket park would be a public use area. An additional garden terrace would be located on top of the residential structures; however, this area would be for private use only. The park and garden terrace features would include trees, vegetation, hardscape, and various water features. The proposed project's public pocket park and public San Diego River Park Pathway, a multiple-use trail, that extends along the San Diego River would provide additional exposure to the natural environment for all of the public to utilize, as depicted in Figures 3-2 and 3-3 of Section 3.0, Project Description. According to the City's General Plan, the proposed parks would provide "mental and social benefits include providing visual relief from urban development, passive recreational opportunities that refresh the mind and provide opportunities for social interaction, and healthy activities for youth. Park and open space lands benefit the environment by providing habitat for plants and animals, and space for urban runoff to percolate into the soil, while also serving to decrease the effects of urban heat islands" (City, Horizon Year). The character of the site from a neighboring perspective would be altered as a result of the residential element of the site. Forty-one (41) of the existing mature trees along the perimeter of the property would be retained and the proposed project would incorporate more trees and vegetation than currently exist on the proposed project site and the new design would

have a positive aesthetic impact. The San Diego River Park Pathway would provide a transition space between the San Diego River MHPA land and the proposed project, as depicted in the proposed project site plan (Figure 3-1 of Section 3.0, Project Description).

Architecturally, the buildings' color schemes and materials would provide various colors and tones within a similar color scheme to provide visual complexity as well as visual continuity between the buildings. The massing and organization of the buildings and their elevations is proposed as classic modern. The exterior walls of the building would consist of brick, exposed concrete, and storefront glazing that is less than 30 percent reflective to avoid high reflectivity and bird strikes. The storefront glazing would take on the colors of the surrounding landscape and sky. The exterior of the structures would include standing seam metal roofing, decorative lighting features, and backlit glazing.

The proposed parking structures would be fully screened for aesthetic appeal. The proposed project would incorporate design details, such as landscaping and ornate hardscape designs that would enhance the visual perspective of the site. The native landscaping elements would provide cohesion with the natural San Diego River. As shown in Figure 3-5 the proposed project would maintain the existing retaining wall that spans a good portion of the western side of the proposed project site; however, the retaining wall would not be visible from any public viewshed, including Camino De La Reina, due to the dense landscaping that would screen it from public viewsheds. As visible in Figure 5.10-2, the project site slopes down from Camino De La Reina as the project site is located within the floodplain.

The proposed project would also incorporate approximately 7' and 8' high retaining walls finished with a rough textured earthen toned finish topped with decorative wrought iron along the northern side of the proposed project and would parallel the San Diego River to protect the San Diego River Park Pathway from the river. The purpose of the retaining walls would be to support the San Diego River Pathway due to the vertical decline to the river; therefore, the majority of the exposed wall height would face the San Diego River and would not be visible from the public viewing area of the San Diego River Park Pathway. The retaining walls would support the proposed overlooks adjacent to the proposed San Diego River Park Pathway and would be screened with vegetation as per the City of San Diego regulations described in Section 142.0300 of the Municipal Code and the goals of the San Diego River Park Master Plan. Additionally, the walls would be topped with ornate wrought iron. Since the majority of the proposed retaining walls would not visually impact the existing or proposed viewshed. All trash storage would be out of site and contained within the structures. With implementation of the proposed project, visual impacts to the surrounding developments and natural topography would be less than significant.

A. Consistency with Applicable City of San Diego Plans

The City of San Diego provides design guidelines with which the proposed project would comply. The guidelines are listed in the City of San Diego General Plan Mission Valley Community Plan, and the San Diego River Park Master Plan. The proposed project is consistent with the guidelines and goals of applicable plans as follows:

City of San Diego General Plan

Table 5.10-1 provides an analysis of the proposed project's consistency with the City of San Diego General Plan recommendations that are applicable to the proposed project's visual quality. The criteria used for determining the

applicability of (and, if necessary, conformance with) specific goals, objectives, recommendations, and design guidelines of the plans were based on the development features identified in the project description, and the direct and indirect impacts of those features, as identified throughout this EIR. With few exceptions, the project was found to be consistent with the majority of the plans' stated goals, objectives, recommendations, and guidelines.

TABLE 5.10-1
General Plan Consistency Analysis

Goals/ Policies	Project Consistency
Goal: A pattern and scale of development that provides visual diversity.	Consistent – The proposed project would provide a mixed-use project of structures that are each individually different in scale, form, and proportion.
Goal: Utilization of landscape as an important aesthetic and unifying element throughout the City.	Consistent – The proposed project incorporates extensive landscaping throughout the site as a unifying element of the development.
Policy: Design buildings that contribute to a positive neighborhood character and relate to neighborhood and community context.	Consistent – The proposed project would positively contribute to the neighborhood character by providing a mixed-use project with residential, office space, and retail serving uses within a pedestrian oriented landscape. The proposed project would support the adjacent San Diego River and provide a San Diego River Pathway between the structures and the river. The buildings designs provide variation in scale, form, and proportions with surface materials and metal roofing that enhances the neighborhood character. The parking structure and visible retaining walls within the project would be screened with vegetation and ornately decorated with wrought iron.
Policy: Create street frontages with architectural and landscape interest to provide visual appeal to the streetscape and enhance the pedestrian experience.	Consistent - The proposed project includes a driveway that opens up the eastern side of the project and includes a public pocket park and the San Diego River Park. The proposed project includes various landscaping along the perimeter for streetscape purposes.
Goal: A city of distinctive neighborhoods	Consistent – The proposed project would provide a dense mixed-use community adjacent to the San Diego River. The proposed project would have iconic architectural features, such as an antenna on top of one of the residential structures.
Goal: Architectural design that contributes to the creation and preservation of neighborhood character and vitality.	Consistent - The proposed project would maintain the existing office building while including additional structures that build upon the existing neighborhood character.

Goals/ Policies	Project Consistency
Policy: Enhance the public streetscape for greater walkability and neighborhood aesthetics.	Consistent – The proposed project includes the San Diego River Pathway as well as landscaped paths throughout the complex that lead to the San Diego River Pathway and the transit station.
Policy: Landscape materials and design should enhance structures, create and define public and private spaces, and provide shade, aesthetic appeal, and environmental benefits.	Consistent – The massing and organization of the buildings and their elevations is proposed as classic modern. The exterior walls of the building would consist of brick, exposed concrete, and storefront glazing that is less than 30 percent reflective to avoid high reflectivity and bird strikes. The storefront glazing would take on the colors of the surrounding landscape and sky. The exterior of the structures would include standing seam metal roofing, decorative lighting features, and backlit glazing. The landscaping throughout the project site would provide shade for pedestrians.
Policy: Encourage the use of underground or above-ground parking structures, rather than surface parking lots, to reduce land area devoted to parking.	Consistent - The proposed project includes a below ground and aboveground parking that would be part of one of the residential buildings.
Policy: Reduce the amount of visual impact of surface parking lots.	Consistent - The proposed project is significantly reducing the number of existing surface parking spaces and therefore reducing the visual impact of surface parking.
Policy: Design project signage to effectively utilize sign area and complement the character of the structure and setting.	Consistent - Due to the substantial residential within the proposed project, signage would be limited and consistent with existing character.
Policy: Minimize the visual and functional impact of utility systems and equipment on streets, sidewalks, and the public realm.	Consistent - The proposed project includes a public pocket park along the northeast boundary and a 20' wide fire access road that also serves as the San Diego River Park Pathway. Along the pathway are small overlooks that serve as viewpoints with seating and interpretive signs for the community to gather.
Policy: Promote the enhanced visual quality of office and industrial development.	Consistent - The proposed project frames the pocket park with several structures in the central areas of the site. Additionally, the townhomes located on the north side of the site provide natural surveillance onto the San Diego River Park area.
Policy: Assure high quality design of buildings and structures. The design and orientation of buildings within projects affect the pedestrian- and transit-orientation.	Consistent - The proposed project would include structures with visually appealing architectural iconic details and variety in bulk, style, and materials. The proposed structures include an architectural projection, dome, and metal rooftops. The exterior walls of the building would consist of brick, exposed concrete, and storefront glazing that is less than 30 percent reflective to

Goals/ Policies	Project Consistency
	avoid high reflectivity and bird strikes. The storefront glazing would take on the colors of the surrounding landscape and sky. The exterior of the structures would include standing seam metal roofing, decorative lighting features, and backlit glazing. The landscaping throughout the project site would consist of landscaping providing shade for pedestrians, and the river corridor would consist of native vegetation.
Policy: Include public driveways, squares or other gathering spaces in each neighborhood and village center.	Consistent - The proposed project includes a San Diego River Park Pathway along the San Diego River and a public pocket park on the northeast corner of the site.
Policy: Frame parks and driveways with buildings, which visually contain and provide natural surveillance into the open space.	Consistent – The proposed project frames the public pocket park with several structures in the central area of the project site. Additionally, the townhomes located on the north side of the site provide direct access to the San Diego River Park Pathway that parallels the San Diego River.

Source: City of San Diego, 2013; BRG Consulting, Inc. 2014

Mission Valley Community Plan

Table 5.10-2 provides an analysis of the proposed project's consistency with the visual objectives and development guidelines from the Mission Valley Community Plan that are applicable to the proposed project.

TABLE 5.10-2
Mission Valley Community Plan Consistency Analysis

Guidelines/Objectives	Project Consistency
Objective: Encourage new commercial development, which relates visually to existing adjacent development.	Consistent – The proposed project incorporates existing development with new proposed structures in a mixed-use project site. The aesthetic appearance of the structures would relate however, remain different in bulk in order to provide aesthetically pleasing variation.
Guideline: Surface lots could reserve land for future development and provide multi-purpose parking areas and urban driveways through the use of decorative paving, kiosks, and other pedestrian and visual amenities.	Consistent – The entry driveway on the east side of the project site would be decoratively hardscaped and landscaped and could potentially provide for multiple uses. The decorative hardscape would be a combination of integral colors and textures, and may include the incorporation of decorative elements such as nature-based imprints. The San Diego River Park Pathway is designed to divert runoff away from the river via the use of pervious pavement or trench drains

Guidelines/Objectives	Project Consistency
	that would redirect and treat runoff prior to discharging it to the San Diego River. An open green space and recreational areas would be located on top of the residential structures.
Objective: Improve the visual quality of the existing and future pedestrian circulation system.	Consistent - The proposed project includes hardscape and landscaping throughout the project site that encourages pedestrian activity. The proposed project includes the preservation of existing trees that would provide shade for the river overlooks where seating and interpretive signage would be provided along the San Diego River Park Pathway.
Proposal: Utilize design principals to enhance visual access to the river.	Consistent - The proposed project includes a San Diego River Park Pathway between the proposed structures and the San Diego River Park to promote public pedestrian activity and visual access along the river corridor. In an effort to preserve and enhance views of the San Diego River, the proposed project's San Diego River Pathway would provide more than 50 percent visual openings to the river frontage, as it would be consistent with the San Diego River Park Master Plan Guideline 4.3.4.7.
Objective: Link the various sub-elements of the San Diego system into a visually cohesive unit.	Consistent - The proposed project includes a San Diego River Park Pathway between the proposed structures and the San Diego River in order to provide fluid continuity between the urban and natural environment.
Proposal: Provide visual access to the San Diego River and the hillsides in order to preserve a sense of openness in the valley.	Consistent - The proposed project would include a San Diego River Park Pathway along the river corridor, which would provide public access and visual access to the San Diego River.
Proposal: Maintain view corridors to identified community landmarks as a means of establishing the uniqueness and maintaining the visual qualities of the community and as a means of providing orientation within the valley.	Consistent - The proposed project would not intersect with any designated scenic viewsheds, it would not block views to any significant iconic structures.

Guidelines/Objectives	Project Consistency
Guideline: Private project recreational and urban plazas should be linked visually and/or physically to the river corridor in order to integrate them into the area-wide open space system.	Consistent - The proposed project would include a San Diego River Park Pathway along the river corridor, which would provide public access to the adjacent portion of the San Diego River. The development also includes a public pocket park adjacent to the San Diego River Park Pathway, which would provide public recreation opportunities. A private garden terrace would be provided to the tenants of the property, which would provide views of the San Diego River Park corridor as well as much of Mission Valley. Since the private recreation area is located on the roof top, which is only accessible to the tenants, there is no physical, only a visual linkage between the private and public recreation areas.
Guideline: Provide visual openings and pedestrian scale along the river, buildings or portions of the buildings nearest the river should be of lower profiles with building heights increasing as distances from the river increase. High-rise structures should be kept back from the river.	Consistent - The proposed project includes residential structures along the riverbed corridor; however, the residential structures have been designed to provide direct line of sight to the river and resign from blocking views towards the river corridor. The only views that would be obstructed would be those of the printing facility, which would be substantially blocked by the proposed above ground parking structure, town homes, and private roof top recreation area, which would all possess views of the San Diego River. The proposed project includes decorative hardscape and landscape vegetation throughout the project site to provide a pleasant pedestrian experience with trees for shade and appealing connection with nature. The proposed project is aligned to accommodate maximum San Diego River viewing opportunities. The private recreation elements being provided on the roof of the residential structures would provide visual overlooks to the River Park and river environs beyond, but are visually screened from the Public Pocket Park.

Guidelines/Objectives	Project Consistency
Guideline: Because of the view impacts of large low-rise buildings as seen from above, roof areas should be carefully designed to enclose mechanical equipment. Projects should also consider the development of roof forms and the use of roof materials that would have positive visual impacts by providing color and pattern. Strong consideration should be given to the use of roofs for recreation, such as terraces and landscaped park like areas, in conjunction with project recreational activities or commercial activities such as restaurants.	Consistent - The proposed project includes two rooftop areas that support private recreational activities and a garden with natural trees. Both of the private roof top areas would include an aesthetically pleasing hardscape and landscaping for pleasant outdoor uses. The rooftops would be visually pleasing for viewers located in the surrounding taller structures. The rooftops of the non-recreational portions of the structures include an architectural dome and antenna with glass and metal materials, which cater to aesthetic appreciation.
Guideline: Private development should be designed with thought given to the creation of landmarks, which provide focal points and better visual orientation. Landmark qualities can be established through the development of vertical building elements, such as towers, and other special building forms, such as - campaniles," domes or other similar structural forms. These architectural forms are particularly applicable to urban centers in commercial developments, which are the focal points of activity in the community.	Consistent - The proposed project includes a vertical modern dome and architecturally projecting antenna, which could all serve as iconic landmarks within the community.
Guideline: Buildings and parking areas should be adapted to the terrain. This includes the terracing of buildings either up or down a slope. In addition to providing views and terraced outdoor deck" areas the visual impact on the slopes are minimized.	Consistent - The proposed project includes grading in areas that currently lie within the floodplain; however, the proposed project strategically includes below ground and above ground structures appropriately within the site. The proposed project poses no significant impact to slopes or hillsides.
Guideline: Pedestrian areas should incorporate patterned paving to give them more visual prominence, human scale, and beauty.	Consistent - The proposed project includes hardscape and landscaping variation throughout the project site that would be appealing from a pedestrian perspective. The project also would include a San Diego River Park Pathway along the river corridor, which would be hardscaped and landscaped to appropriately provide an open space feel to the pedestrian area.

Guidelines/Objectives	Project Consistency
Guideline: Private project recreational and/or urban driveways should be linked visually and/or physically to the open space corridor, in order to integrate them into the area wide-open space system.	Consistent - The project also would include a San Diego River Park Pathway along the river corridor, which would be hardscaped and landscaped to appropriately provide an open space feel to the pedestrian area.

Source: City of San Diego, 2013; BRG Consulting, Inc. 2014

City of San Diego Multiple Species Conservation Program Subarea Plan

In Section 1.4.3 of the MSCP Subarea Plan, the Land Use Adjacency Guidelines state that land uses adjacent to the MHPA would be managed to ensure minimal impacts to the MHPA. Table 5.10-3 lists the adjacency guidelines that the MSCP Subarea Plan states shall be addressed in order to minimize impacts and maintain the function of the MHPA. Additional discussion of the project's compliance with the MSCP can be found in EIR Section 5.4, Biological Resources.

Table 5.10-3
City of San Diego MSCP Subarea Plan Consistency Analysis

Recommendation	Project Consistency
Lighting - Lighting of all developed areas adjacent to the MHPA should be directed away from the MHPA. Where necessary, development should provide adequate shielding with non-invasive plant materials (preferably native), berming, and/or other methods to protect the MHPA and sensitive species from night lighting.	Consistent – The proposed project would avoid all lighting impacts to the extent practicable, minimizing unavoidable impacts, and mitigating any impacts that cannot be avoided or minimized.

Source: City of San Diego, 2013; BRG Consulting, Inc. 2014

San Diego River Park Master Plan

According to the *San Diego River Park Master Plan* (2013) the following "design guidelines are intended to assure that development occurs in a manner that protects the overall quality of the resources and the natural and topographic character of the area, encourages a sensitive form of development, retains biodiversity and interconnected habitats, maximizes physical and visual public access to and along the shoreline, and reduces hazards due to flooding in specific areas while minimizing the need for construction of flood control facilities." The Design Guidelines applicable to the visual impact of the proposed project are summarized in Table 5.10-4 below.

Table 5.10-4
San Diego River Park Master Plan Design Guidelines Consistency Analysis

Design Guidelines	Project Consistency
"Secondary pathways and trails should be visual and physical green connections that connect more people to the ecology, culture and history of the river."	Consistent – The proposed project includes a San Diego River Park Pathway between the proposed structures and the San Diego River, providing a public pedestrian linkage to overlooks upon the San Diego River. The proposed project includes hardscape and native landscaping within the public pocket park and the San Diego River Park Pathway of the proposed project.

Design Guidelines	Project Consistency
"To create visual interest, the building massing should vary in form and façade and avoiding repetition and monotonous walls. Building levels and planes should vary to create visual interest and to help define view corridors. To maximize view corridors to the river, the upper levels of the structure to diminish in size to create a slimmer silhouette than the lower levels of the structure. The building width facing the river at and above 70 feet in height above finish grade should be reduced by a minimum of 30 percent of the width of the building at the ground floor fronting the river."	Consistent – The design of the structures provide variation in form and proportions with surface materials and metal roofing that enhances the neighborhood character. The parking structure and retaining walls within the project would be screened with vegetation. The proposed project includes residential structures along the riverbed corridor; however, the residential structures have been designed to resign from blocking views towards the river corridor.
"Fences and walls should provide screening without visually walling-off the River Corridor Area. Within the 10-foot building setback from the River Corridor Area, the following fences and walls should be consistent with the following: o Solid fences or walls not exceeding 3 feet in height. o Fences or walls of 6 feet in height that are 75 percent open/transparent. o A combination of a 3 feet solid fence or wall topped with a 3-foot fence or wall that is 75 percent open/transparent. o For purposes of this section chain link fencing does not qualify as a 75 percent open fence. Chain link fencing should not be used in the 10-foot building setback and used only within landscape areas where plant material can screen the chain link and the chain link fence should have a green or black vinyl covering.	Consistent – The proposed project would incorporate approximately 7' and 8' retaining walls, along the northern side of the proposed project and would parallel the San Diego River. The purpose of the retaining walls would support the vertical decline to the river. The retaining walls would support the proposed overlooks adjacent to the proposed San Diego River Pathway and would be screened with vegetation as per the City of San Diego regulations described in Section 142.0300 of the Municipal Code and the goals of the San Diego River Park Master Plan.

Source: City of San Diego, 2013; BRG Consulting, Inc. 2014

5.10.3.2 Significance of Impact

With implementation of the above mentioned design features, the proposed project would result in beneficial impacts to the aesthetic environment and is consistent with the visual resource guidelines in the City of San Diego General Plan, Mission Valley Community Plan, MSCP Subarea Plan, and the San Diego River Park Master Plan. Although the proposed project would substantially change the existing project site make-up, the proposed project would improve upon the aesthetic appearance of the site with an architecturally diverse mixed-use development with visually appealing hardscape and landscaping around the site. The proposed project would increase public and private views towards the Mission Valley hillsides as well as the San Diego River. The proposed project would not result in

adverse visual impacts to the proposed project site and the surrounding area; therefore, no significant negative visual impacts would result from implementation of the proposed project.

5.10.3.3 Mitigation, Monitoring, and Reporting

No mitigation measures would be required.

5.10.3.4 Impacts After Mitigation

No negative visual impacts were identified for this issue area.

5.10.4 Issue 3

Issue 3: Would the proposed project's bulk and scale, materials or style be incompatible with the surrounding development?

5.10.4.1 Impact Analysis

According to the City of San Diego Significance Determination Thresholds, impacts to aesthetics/ neighborhood character may be considered significant if the project would:

- *Exceed the allowable height or bulk regulations and height and bulk of existing patterns of development in the vicinity of the project by a substantial margin;*
- *Have an architectural style or use building materials in stark contrast to adjacent development where the adjacent development follows a single or common architectural theme; and/or,*
- *Be located in a highly visible area and would strongly contrast with the surrounding development or natural topography through excessive height, bulk, signage, or architectural projections.*

The proposed project would exceed the height of the immediately adjacent surrounding buildings, but would not substantially exceed the overall height of the surrounding existing development. The proposed project would be located in an industrial/commercial area that is surrounded by the SR-163 and I-8 interchange and is not considered visually sensitive, except for the visual sensitivity of the adjacent San Diego River, which is addressed above.

The proposed project would positively effect the surrounding area with a contemporary development that would complement the existing Fashion Valley Mall, multi-family residential architecture, the Hazard Center Building and other surrounding multi-story hotel developments. Although the proposed project would create an architectural projection compared to the existing adjacent development, the architectural projection is consistent with the other distant surrounding contemporary development of the area, which is founded on higher ground. The structures of the project would be visible from the surrounding roadways, I-8 and SR-163, but the proposed project does not lie within a designated scenic viewshed.

The architecture, style, and color scheme of the project is consistent with the Mission Valley Planning District Ordinance in relation to height and bulk of the Mission Valley planning area north of I-8. Additionally, the proposed project would provide the San Diego River Park Pathway, which would enhance and provide visual public access to

the natural features of the San Diego River. Therefore, the proposed project would pose a less than significant impact for this visual impact issue area.

5.10.4.2 Significance of Impact

Since the proposed project is consistent with the goals and policies of the City of San Diego and is similar to the contemporary designs of the surrounding area, the proposed project poses a less than significant visual impact to the surrounding development.

5.10.4.3 Mitigation, Monitoring, and Reporting

No mitigation would be required.

5.10.4.4 Impacts After Mitigation

The proposed project poses a less than significant visual impact to the surrounding development.

5.10.5 Issue 4

Issue 4: Would the proposed project cause a substantial alteration to the existing or planned character of the area?

5.10.5.1 Impact Analysis

According to the City of San Diego Significance Determination Thresholds, impacts to aesthetics/ neighborhood character may be considered significant if the project would:

- *Have a cumulative effect by opening up a new area for development or changing the overall character of the area.*

The proposed project is dense mixed-use development and would not encourage or facilitate additional development on any undeveloped or open space land. The only open space land in the vicinity of the project is associated with the San Diego River and falls under the San Diego River Park Master Plan. These lands generally are not available for development. The proposed project provides an aesthetically pleasing contemporary component to the region. The proposed project is slightly more dense land use than its immediately adjacent neighboring developments but is similar to the density of the more distant and newer residential developments of the community. The project is densely populated because it is a transit-oriented development, which is located near the existing transit station. The proposed project is consistent with the overall mixed-use character of the general area.

5.10.5.2 Significance of Impact

The proposed project would result in a less than significant visual impact upon the surrounding area.

5.10.5.3 Mitigation, Monitoring, and Reporting

No mitigation measures would be required.

5.10.5.4 Impacts After Mitigation

The proposed project would result in a less than significant visual impact upon the surrounding area.

5.10.6 Issue 5

Issue 5: Would the proposed project cause a loss of any distinctive tree(s), or stand of mature trees as identified in the community plan?

5.10.6.1 Impact Analysis

According to the City of San Diego Significance Determination Thresholds, impacts to aesthetics/ neighborhood character may be considered significant if the project would:

- *Result in the physical loss, isolation or degradation of a community identification symbol or landmark, which is identified in the General Plan, applicable community plan or local coastal program.*

There are no community symbols or landmarks identified within the community plan within view from the proposed project site, with the exception of the San Diego River. The proposed project would support the community significance of the river by avoiding development within the river and the MHPA, and by providing the San Diego River Pathway adjacent to the river. Jack Murphy Stadium is located several miles east of the project site and is considered to be a community landmark, but the stadium is not visible from the existing property due to the elevated SR-163, vegetation, and distance between the site and the stadium. The proposed project site is not designated as historical landmark.

The proposed project has been designed to protect in place (41) of the existing mature trees along the Camino de la Reina street frontage, including (25) California Sycamore Trees, (9) Torrey Pines, (1) Ficus Tree, (1) Olive Tree, and (5) Paperbark Trees. The mature trees onsite are landscape trees and have been preserved to the extent feasible given the need to improve Camino De La Reina.. The preservation of these trees would maintain the existing visual character of the area. Additionally, the streetscape is being supplemented with additional parkway trees, groundcover, and low growing shrubs. Overall, the landscaped feel of the proposed project site would change with implementation of the proposed project. However, new additional native and non-native vegetation (including trees) has been incorporated into the design and would mature over time to create a dense vegetated street frontage. Thus, the project would not result in the loss, isolation, or degradation of a community identification symbol or landmark. Views of the river from Camino De La Reina would not be further blocked with implementation of the proposed project.

5.10.6.2 Significance of Impact

The proposed project would result in a less than significant impact to existing community identification symbols and landmarks.

5.10.6.3 Mitigation, Monitoring, and Reporting

No mitigation measures would be required.

5.10.6.4 Impacts After Mitigation

The proposed project would result in a less than significant impact to existing community identification symbols and landmarks.

5.10.7 Issue 6

Issue 6: Would the proposed project cause a substantial amount of light or glare that would adversely affect daytime or nighttime views?

5.10.6.1 Impact Analysis

According to the City of San Diego Significance Determination Thresholds (City, 2011b), light, glare, and shading impact may be significant if the project would:

- *Be moderate to large in scale-more than 50% of any single elevation of a building's exterior is built with a material with light reflectivity greater than 30% and the project is adjacent to a major public roadway or public area; and/or,*
- *Shed substantial light onto adjacent property or emit a substantial amount of ambient light into the nighttime sky.*

The proposed project area is in a highly dense urban node that already exhibits several major lighting sources, such as the lighting along roadways (e.g. Camino De La Reina, I-8 and SR-163). The existing site currently includes lighting around buildings, along walkways, and in parking areas for safety and security reasons. Other significant sources of light in the area include other commercially developed properties. The project would include exterior lighting for safety and security purposes that would be shielded and would be in compliance with existing regulations. The project would not create a new source of substantial light or glare that would adversely affect daytime or nighttime views in the area. Given these factors, the contribution of light emitted from the project's buildings would be less than significant.

A. Glare

As mentioned above, the proposed project's windows would include grey storefront glazing, which effectively limits glare. The proposed metal roof would not be a polished metal and so would not create glare impacts. As a result, the reflection of natural or artificial light off the structural façade and roof would not cause any visual impacts related to substantial glare or result in safety issues along the adjacent public roads or cause potential bird strikes. The project would be designed in accordance with the State of California Building Code and Municipal Code requirements.

5.10.6.2 Significance of Impact

The proposed project would not result in substantial light or glare that would adversely affect daytime or nighttime views in the area.

5.10.6.3 Mitigation, Monitoring, and Reporting

No mitigation measures would be required.

5.10.6.4 Impacts After Mitigation

The proposed project would not result in substantial light or glare impacts that would adversely affect daytime or nighttime views in the area.

5.10.8 Issue 7

Issue 7: Would the proposed project create a substantial change in the existing landform?

5.10.8.1 Impact Analysis

According to the City of San Diego Significance Determination Thresholds, impacts to landform may be considered significant if the project would:

- *Alter more than 2,000 cubic yards of earth per graded acre by either excavation or fill. Grading of a smaller amount may still be considered significant in highly scenic or environmentally sensitive areas.*

The project would cut 76,700 cubic yards of soil and place 28,202 cubic yards of fill within 7.2 acres of the proposed project site in order to redevelop the site with the proposed residential buildings and parkland. However, a substantial portion of the soil would be excavated to construct the underground parking spaces, so a substantial portion of the landform disturbance would not be visible. The soil fill areas would be located under the proposed residential/parking structure building and area where the proposed public pocket park would be located.

The proposed project would alter more than 2,000 cubic yards per of earth per graded acre; however, a substantial amount of the grading would not be visible from any public viewpoints because it would be located under the proposed buildings and the excavation and fill soils would simply level out the existing site and provide underground parking under two of the proposed structures. From Camino De La Reina, the project site appears to be relatively level (See Figures 5.10-1 through 5.10-3 above); therefore, the proposed project would not result in a significant landform alteration for the site. The project would not disturb steep hillsides. No manufactured slopes higher than 10 feet or steeper than 2:1 ratio would be created; there are no steep hillsides in the project area as defined by City Municipal Code, Section 113.0103; and the project design does not include mass terracing of slopes. Since the proposed project would not significantly alter the visible landform of the site, the proposed project would not pose a significant impact to the existing landform.

5.10.8.2 Significance of Impact

The proposed project would pose a less than significant impact to the existing landform from all public viewpoints.

5.10.8.3 Mitigation, Monitoring, and Reporting

No mitigation measures have been identified.

5.10.8.4 Impacts After Mitigation

The proposed project would pose a less than significant impact to the existing landform from all public viewpoints.

5.10.9 Conclusion

The proposed project would substantially change the visual appearance of the proposed site by increasing building mass and density; however, the proposed project is consistent with the City of San Diego General Plan, Mission Valley Community Plan, MSCP Subarea Plan, and San Diego River Park Plan, and would substantially improve the visual quality of the site. The proposed project would not substantially effect any visual resources or create any substantial light or glare in the area. The proposed project would pose a less than significant impact to the existing landform. The proposed changes in landform would not be visible from any public viewpoint. The proposed project would result in less than significant impacts to visual resources and neighborhood character.

5.11 Water Quality

This section of the EIR discusses the potential environmental impacts of the proposed project associated with water quality. Information contained in this section is summarized from the *Preliminary Drainage Study* (dated December 12, 2013) and *Preliminary Drainage Study – Addendum* (dated December 10, 2014) (Appendices F1 and F2, respectively, of this EIR); and the *Water Quality Technical Report* (dated April 2014) and *Water Quality Technical Report – Addendum* (dated December 10, 2014) (Appendices G1 and G2, respectively, of this EIR) prepared by Latitude 33 Planning and Engineering. These documents are provided on the attached CD of Technical Appendices found on the back cover of this EIR.

5.11.1 Existing Conditions

Water quality is affected by sedimentation caused by erosion, runoff carrying contaminants, and direct discharge of pollutants (point-source pollution). Runoff potentially contains oils, heavy metals, pesticides, fertilizers, and other contaminants (non-point source pollution) into adjacent watersheds. The most immediate receiving water for this project is the San Diego River, which discharges into the Pacific Ocean at the community of Ocean Beach. Approximate elevations within the project site range from 27 feet (ft) above mean sea level (amsl) to 42 ft amsl, with the highest geographical point located near the existing building situated on the southwestern edge of the site. The majority of the existing site generally slopes to existing infrastructure that outfall directly to the San Diego River to the north. The stormwater on the southerly portion of the site is collected within existing infrastructure along Camino De La Reina and routed to a conveyance system that ultimately discharges into the San Diego River further downstream.

The San Diego River is listed as an impaired water body on the California 2010 303(d) list. Under section 303(d) of the Clean Water Act (CWA), states are required to identify and list surface water bodies that are polluted. States are required to compile these water bodies into a list, referred to as the "Clean Water Act Section 303(d) List of Water Quality Limited Segments". States must also prioritize the water bodies on the list and develop Total Maximum Daily Loads (TMDLs) for different pollutant types (impairments) in order to improve the water quality of the receiving water. The impairments of the San Diego River's lower reach for which TMDLs exist include: fecal coliform, low dissolved oxygen, phosphorus, and total dissolved solids.

Additionally, portions of the San Diego River north of the project site would be considered jurisdictional wetlands under local, state, and federal regulations, and part of this area would also be considered waters of the U.S. under federal regulation. There is a stormwater drain that flows from the north-central edge of the parking area under curbs and into the undeveloped area to the north of the project. The storm drain spillway creates a small channel that presumably flows into the San Diego River during rain events. The channel does not support wetland species, and as such would not likely be deemed a local, state or federal jurisdictional wetland (Rocks, 2013).

Beneficial Uses

According to the Regional Water Quality Control Board (RWQCB), the segment of the San Diego River located in Hydrologic Unit 907.11 and adjacent to the project site is classified as having the following beneficial uses:

- **Agricultural Supply (AGR):** Includes uses of water for farming, horticulture, or ranching including, but not limited to, irrigation, stock watering, or support of vegetation for range grazing.

- **Industrial Service Supply (IND):** Includes uses of water for industrial activities that do not depend primarily on water quality including, but not limited to, mining, cooling water supply, hydraulic conveyance, gravel washing, fire protection, or oil well re-pressurization.
- **Contact Water Recreation (REC-1):** Includes uses of water for recreational activities involving body contact with water, where ingestion of water is reasonably possible. These uses include, but are not limited to, swimming, wading, water-skiing, skin and SCUBA diving, surfing, white water activities, fishing, or use of natural hot springs.
- **Non-Contact Water Recreation (REC-2):** Includes the uses of water for recreational activities involving proximity to water, but not normally involving body contact with water, where ingestion of water is reasonably possible. These uses include, but are not limited to, picnicking, sunbathing, hiking, beachcombing, camping, boating, tide pool and marine life study, hunting, sightseeing, or aesthetic enjoyment in conjunction with the above activities.
- **Preservation of Biological Habitats of Special Significance (BIOL):** Includes uses of water that support designated areas or habitats, such as established refuges, parks, sanctuaries, ecological reserves, or Areas of Special Biological Significance (ASBS), where the preservation or enhancement of natural resources requires special protection.
- **Warm Freshwater Habitat (WARM):** Includes uses of water that support warm water ecosystems including, but not limited to, preservation or enhancement of aquatic habitats, vegetation, fish or wildlife, including invertebrates.
- **Wildlife Habitat (WILD):** Includes uses of water that support terrestrial ecosystems including, but not limited to, preservation and enhancement of terrestrial habitats, vegetation, wildlife (e.g., mammals, birds, reptiles, amphibians, invertebrates), or wildlife water and food sources.
- **Preservation of Rare and Endangered Species (RARE):** Includes uses of water that support habitats necessary for the survival and successful maintenance of plant or animal species established under state and/or federal law as rare, threatened, or endangered.

5.11.2 Issue 1

Issue 1: Would the project result in an increase in pollutant discharge, including downstream sedimentation, to receiving waters during construction or operation, including discharge to an already impaired water body?

5.11.2.1 Impact Analysis

According to the City of San Diego's CEQA Significance Determination Thresholds, compliance with the Water Quality Standards is assured through permit conditions. As such, the water quality threshold is adherence to the City's Storm Water Standards Manual.

As a priority development project, potential pollutants that are anticipated to be generated by the proposed project include sediments, nutrients, heavy metals, organic compounds, trash and debris, oxygen demanding substances, oil and grease, bacteria and viruses, and pesticides. These anticipated pollutants are considered primary pollutants of

concern due to their probable cause of CWA 303(d) designation for the San Diego River, and result in 303(d) Impairment Listings for eutrophic conditions, benthic community degradation, sediment toxicity, storm water runoff toxicity, and low dissolved oxygen.

The project would not result in a substantial increase in impervious surfaces and associated runoff. The proposed project does not encompass the entire site and therefore all existing conditions that are remaining are not required to be treated. Existing drainage patterns would be maintained as much as practicable in the proposed condition. Four of the existing drainage discharge points were maintained while two new discharge points were added. Although, some of the individual basin sizes changed from the existing condition to the proposed condition, the overall basin size was decreased to 8.49 acres. Based on preliminary hydrology calculations, there would be a decrease in overall flow from 42.5 cubic feet per second (cfs) to 28.1 cfs as a result of the proposed project.

The overall flow (Q_{50}) for the proposed project was reduced because of the decrease in impervious surface area and increase in permeability when compared to the existing condition. In addition, the overall flow was reduced through the use of bio-retention swales and basins. Flows similar to the existing condition have either been reduced or routed to proposed bio-retention systems before ultimately discharging into the existing storm drain system, or directly into the San Diego River.

Within basins P1, P2, and P5, three bio-retention facilities would be sited in project landscape areas and will be accessed via storm drain infrastructure. The bio-retention facility located in basin P5 would consist of a vegetated swale. During smaller storm events (2- and 5-year), the bio-retention basins and swales would capture water and allow infiltration into engineered soil at a rate of 5 inches per hour, which results in an increased time of concentration (Tc). For larger storm events (50- and 100-year), the initial flush would be retained while the additional flow would be routed through an emergency outflow. Overall these facilities treat and capture stormwater in order to reduce pollutants, increase time of concentration, and reduce the runoff volumes associated with the proposed project. Based on the Intensity-Duration-Frequency Curves developed for San Diego County, which can be found in the *Preliminary Drainage Study*, the increased time of concentration corresponds to a smaller intensity. As such, the proposed project would improve stormwater runoff quality as compared to existing conditions, thus improving buffer and wetland water purification functions.

Within basin P6, three 4'x4' Jellyfish filter units will be placed in the locations of three existing catch basins serving the existing parking lot south of the UT printing facility. Due to size and infrastructure constraints within basins P7 through P10, Modular Wetlands Systems will be installed in order to treat drainage using a flow-based treatment involving internal bio-filters. Figure 5.11-1 shows the location of the bio-retention facilities, Jellyfish filter units, and Modular Wetlands Systems.

The proposed project would occur in the same developed area as the existing site, and as such would not degrade existing wetland functions and values, including important water quality functions. The existing undeveloped wetland buffer north of the site, ranging in width from approximately 30 to 105 feet and averaging approximately 70 feet wide, would be maintained between site development and City-jurisdictional wetlands. Additionally, approximately 70 feet of the northern proposed project site includes a fire access area and walkways, which would be built with porous material. The total porous buffer from office or residential buildings would range in width from 100 to 175 feet, with an

average width of approximately 140 feet overall. The porous access area would allow water infiltration for site runoff and improve water quality runoff as compared to the existing condition under which much of the site runoff flows untreated into the wetland buffer and river.

Furthermore, the project would implement low-impact design (LID) features to mitigate storm water throughout the life of the project, which include:

- Conserve natural areas, provide buffer zones between natural water bodies and the project footprint, preserve existing native trees and shrubs, and concentrate or cluster development on the least environmentally sensitive portions of the site.
- Minimize impervious footprint.
- Minimize directly connected impervious areas.
- Incorporate soil amendments – Landscape topsoil improvements play a significant role in maintaining plan and lawn health. In addition it improves the soil's capacity to retain moisture, which will reduce runoff from the water quality design storm and improved water quality.
- Vegetate slopes with native or drought tolerant vegetation.
- Stabilize permanent channel crossings.
- Energy dissipaters shall be installed in such a matter as to minimize impacts to receiving waters.

This project would also include natural and structural construction and post-construction Best Management Practices (BMPs). Source control BMPs would be implemented to reduce potential for contamination at the source of pollution, and treatment control BMPs would be implemented to remove pollutants from urban runoff through biological, chemical, and physical processes, including engineered bio-retention facilities and vegetated swales. Please refer to Appendices G1 and G2 of this EIR for further detail regarding the proposed LID site design BMPs, source control BMPs, and treatment control BMPs. A full Storm Water Pollution Prevention Plan (SWPPP) for Construction Activities would also be developed for the project to assure compliance with the City's stormwater standards. With the implementation of BMPs and adherence to the SWPPP, the proposed project would not result in a significant water quality impact.

5.11.2.2 Significance of Impact

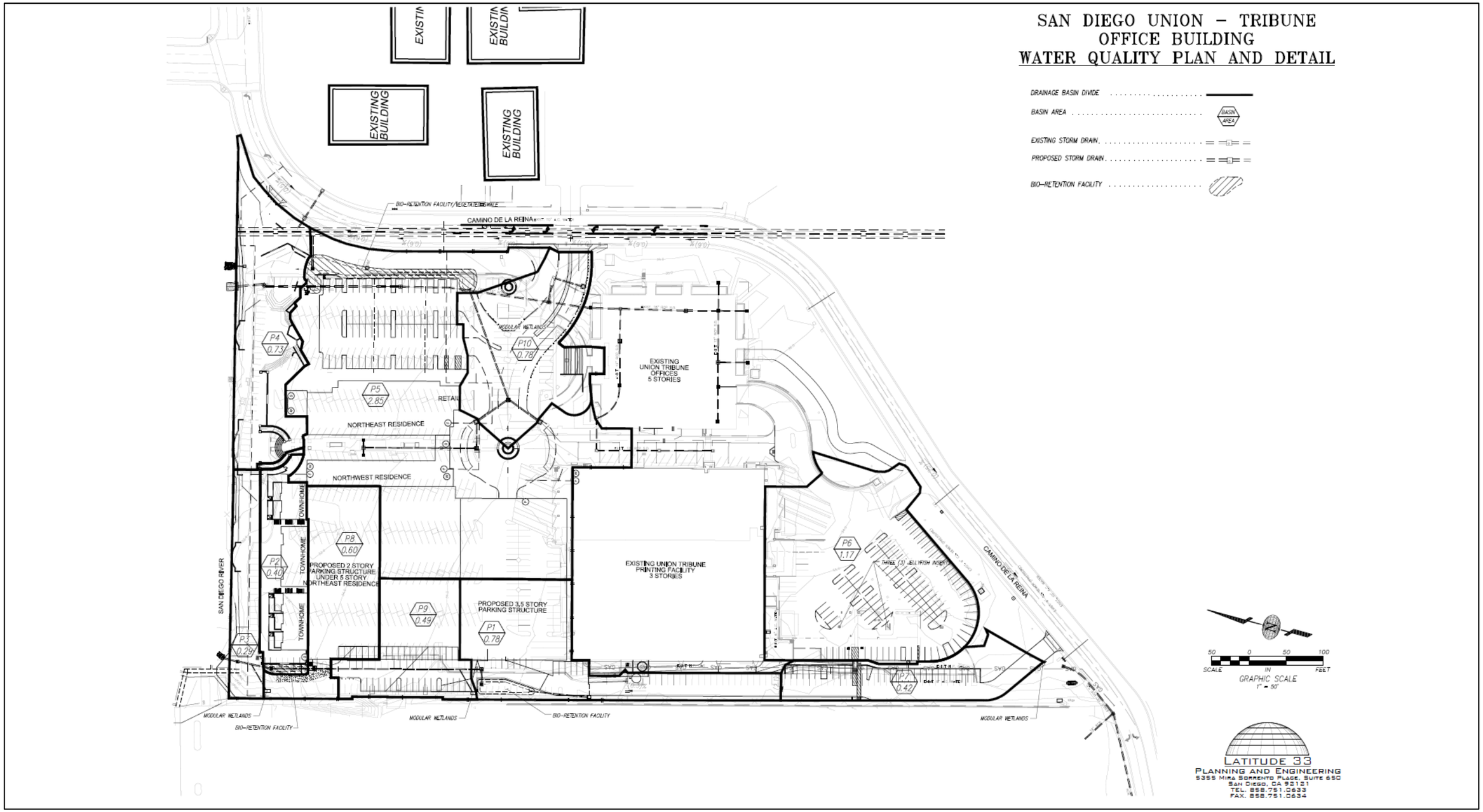
The proposed project would not result in an increase in pollutant discharge as a result of an overall decrease in the amount of impervious surfaces and associated runoff from implementation of the proposed project. In addition, the proposed project would not violate any water quality standards or waste discharge requirements; therefore, the proposed project would have no significant impacts relating to water quality.

5.11.2.3 Mitigation, Monitoring, and Reporting

Because there are no anticipated significant impacts with the project, no mitigation measures are required.

5.11.2.4 Impacts After Mitigation

No mitigation would be required; therefore, there are no impacts after mitigation.



SOURCE: Latitude 33, Inc., 2014

12/12/14

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Union Tribune Mixed Use Project EIR

Water Quality Plan and Detail

FIGURE 5.11-1

5.11.3 Conclusion

The proposed project would not have a significant water quality impact since the proposed project would implement various natural and structural construction and post construction BMPs. The proposed BMPs would reduce the anticipated pollutants of concern prior to runoff entering the storm drain system. The proposed project would impact water quality during construction if sediment were allowed to flow offsite untreated. Therefore, potential downstream impacts would be reduced with the installation of erosion control and construction and post construction BMPs. As such, there would be no impacts associated with water quality.

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5.12 Paleontological Resources

This section of the EIR discusses the potential environmental impacts of the proposed project on paleontological resources.

5.12.1 Existing Conditions

Paleontological resources represent a limited, nonrenewable, and impact-sensitive scientific and educational resource. As defined in this section, "paleontological resources" (i.e., fossils) are the remains and/or traces of prehistoric plant and animal life exclusive of man. Fossil remains such as bones, teeth, shells, and leaves are found in the geologic deposits (rock formations) where they were originally buried. Paleontological resources include not only the actual fossil remains, but also the collecting localities, and the geologic formations containing those localities.

Paleontological resource sensitivities are rated for individual geologic formations and recognize the important relationship between fossils and the geologic formations within which they are entombed. A high sensitivity is assigned to geologic formations known to produce vertebrate fossil remains or are considered to have the potential to produce such remains. A moderate sensitivity is assigned to geologic formations that are judged to have a strong, but unproven potential for producing important fossil remains. A marginal sensitivity is assigned to geologic formations that are composed either of pyroclastic volcanic or meta sedimentary rocks, but which nevertheless have a limited probability of producing fossil remains from certain sedimentary lithologies at localized outcrops.

The proposed project site lies in the Coastal Plain region of the Peninsular Ranges Geomorphic Province, and contains several rock formations. This province is underlain by a sequence of marine and non-marine sedimentary rock units that record portions of the last 140 million years of earth history. Over this period of time, the relationship of land and sea has fluctuated drastically, such that today there are ancient marine rocks preserved up to elevations of about 900 feet above mean sea level (AMSL) (City of San Diego, 2007). According to the Geologic Reconnaissance Report (Appendix E1 of this EIR), the project site is underlain by undocumented fill, alluvium, and Stadium Conglomerate. The characteristics of each geologic formation/unit found in the project area are summarized below (Deméré & Walsh, 1994).

Late Quaternary Alluvium

The sediments at the bottom of streambeds of the later Quaternary alluvium are generally younger than 10,000 years old. In the Coastal Plain Region, later Quaternary alluvial deposits occur extensively along the floors of major east-west trending drainages, as well as in many of the smaller tributary drainages. Fossils are generally unknown from these deposits in the Coastal Plain Region. However, there are three notable exceptions. Teeth and limb bones of a mammoth were found in floodplain deposits of the Tijuana River Valley, a single mammoth tusk was found in alluvial deposits in the southwestern portion of El Cajon Valley, and a mammoth femur was recovered from alluvium in the Santa Margarita River channel at the south end of the Camp Pendleton Marine Corps Base. Because of their young age, later Quaternary alluvial deposits in San Diego County are assigned a low paleontological resource sensitivity.

Stadium Conglomerate

The Stadium Conglomerate is made up of two conglomeratic units that are distinct both with regard to the time period of formation and to the composition of the formation (City, 2007). The upper and lower conglomeratic units are in depositional contact in the Mission Valley and Murphy Canyon areas. However, to the north and east, the upper

member appears to be absent. The proposed project is located within the upper member of the Stadium Conglomerate. Fossil foraminifers and marine mollusks have been collected from the upper member of the Stadium Conglomerate. Collecting sites in Murphy Canyon have yielded sparse, but well-preserved remains of opossums, insectivores, primates, rodents, carnivores, rhinoceros, and artiodactyls. The Stadium Conglomerate is assigned a high paleontological resource sensitivity.

5.12.1.1 Regulatory Setting

Pursuant to Section 15065 of the State CEQA Guidelines, a lead agency must find that a "project may have a significant effect on the environment and therefore require an EIR to be prepared for the project where the project has the potential to eliminate important examples of the major periods of California history or prehistory, which includes the destruction of significant paleontological resources."

According to the City of San Diego's CEQA Significance Determination Thresholds, impacts to paleontological resources are considered potentially significant for areas with a high sensitivity if grading would exceed 1,000 cubic yards and extend to a depth of 10 feet or greater, and for areas with moderate sensitivity if grading would exceed 2,000 cubic yards and extend to a depth of 10 feet or greater. Additionally, impacts would be considered significant in areas of shallow grading where formational soils are exposed at the surface (i.e., as a result of previous grading) and where fossil localities have already been identified (City of San Diego, 2011).

5.12.2 Issue 1

Issue 1: Would the proposed project require over 1,000 cubic yards of excavation in a high resource potential geologic formation or over 2,000 cubic yards of excavation in a moderate resource potential formation that would result in the loss of significant paleontological resources?

5.12.2.1 Impact Analysis

According to the City's CEQA Significance Determination Thresholds, significant impacts to paleontological resources would occur if the proposed project would:

- *Require over 1,000 cubic yards of excavation extending to a depth of 10 feet or greater in a high resource potential geologic deposit/formation/rock unit; or,*
- *Require over 2,000 cubic yards of excavation extending to a depth of 10 feet or greater in a moderate resource potential geologic deposit/formation/rock unit.*

Human understanding of history is obtained, in part, through the discovery and analysis of paleontological resources. Because paleontological resources are largely a buried resource, there is no way to accurately predict what fossils are present within a site or their individual significance to the scientific community before they are discovered. Paleontological resources are typically impacted when earthwork activities such as mass excavation or grading cut into geological deposits (formations) within which fossils are buried. These impacts are in the form of physical destruction of fossil remains. Since fossils are the remains of prehistoric animal and plant life, they are considered to be non-renewable. As a result, such impacts are significant under CEQA Guidelines, and require mitigation.

As described above, the alluvial deposits underlying the project site have a low potential for producing significant paleontological resources. However, the Stadium Conglomerate underlying the project site has a high potential for producing significant paleontological resources.

Any earthwork requiring excavation of 1,000 cubic yards or more and would extend to a depth of 10 feet or greater within the Stadium Conglomerate has the potential to significantly impact paleontological resources. As further discussed in Section 5.5 – Geologic Conditions of this EIR, the site is expected to be underlain by undocumented fill and alluvium extending to maximum depths of approximately 60 feet to 90 feet below existing grade, overlying the formational Stadium Conglomerate. As such, the proposed project would only impact the Stadium Conglomerate if excavation and earthwork extended beyond these depths. Due to the relatively low density of the alluvial deposits, the potential for liquefaction and seismically induced settlement occurring within the project site exists. As a result, deep foundations may need to be installed to mitigate potential impacts associated with liquefaction and seismically induced settlement. If deep foundations need to be installed, the piles would extend into the Stadium Conglomerate. Under these circumstances, the proposed project would have the potential to result in significant impacts to paleontological resources potentially present within the Stadium Conglomerate. However, implementation of Mitigation Measure PR-1 would reduce potential impacts to paleontological resources to a level less than significant. Mitigation Measure PR-1 requires monitoring of project site grading and excavation for paleontological resources, as well as recovery and proper curation of fossils should significant fossils be encountered during these activities.

5.12.2.2 Significance of Impact

Construction of the proposed project has the potential to result in the substantial excavation of potential fossil-bearing geologic formations. As such, potential impacts to paleontological resources would be considered significant. However, with the implementation of Mitigation Measure PR-1, this impact would be reduced to a level less than significant.

5.12.2.3 Mitigation, Monitoring, and Reporting

The following mitigation measure has been developed by the City of San Diego to reduce potential impacts to paleontological resources to less than significant level. This measure encompasses a comprehensive program to protect paleontological resources should they be found at a construction site. The mitigation program is consistent with standard programs employed at other sites within the City of San Diego. Implementation of these measures would allow preservation and future scientific study of any important paleontological resources encountered, thereby reducing the potential impact to below a level of significance.

PR-1 I. Prior to Permit Issuance

A. Entitlements Plan Check

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.

B. Letters of Qualifications have been submitted to ADD

1. Prior to the NTP, and/or issuance of a Grading Permit, Demolition Permit or Building 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.
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.
3. Prior to the start of work, the applicant shall obtain approval from MMC for any personnel changes associated with the monitoring program.

II. Prior to the Start of Construction

A. Verification of Records Search

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.
2. The letter shall introduce any pertinent information concerning expectations and probabilities of discovery during trenching and/or grading activities.

B. PI Shall Attend Precon Meetings

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 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.
   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.
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).
3. When Monitoring Will Occur
   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.

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 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.

III. During Construction

A. Monitor Shall be Present During Grading/Excavation/Trenching

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.
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.
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.

B. Discovery Notification Process

1. In the event of a discovery, the 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.
2. The Monitor shall immediately notify the PI (unless Monitor is the PI) of the discovery.
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.

C. Determination of Significance

1. The PI shall evaluate the significance of the resource.
   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.
   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.

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 Paleontologist shall continue to monitor the area without notification to MMC unless a significant resource is encountered.

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.

VI. Night Work

A. If night work is included in the contract

1. When night work is included in the contract package, the extent and timing shall be presented and discussed at the Precon Meeting.

2. The following procedures shall be followed:

a. No Discoveries

In the event that no discoveries were encountered during night work, The PI shall record the information on the CSVR and submit to MMC via fax by 9:00 a.m. the following morning, if possible.

b. Discoveries

All discoveries shall be processed and documented using the existing procedures detailed in Sections III – During Construction.

c. Potentially Significant Discoveries

If the PI determines that potentially significant discovery has been made, the procedures detailed under Section III – During Construction shall be followed.

d. The PI shall immediately contact MMC, or by 8:00 a.m. the following morning to report and discuss the findings as indicated in Section III-B, unless other specific arrangements have been made.

B. If night work becomes necessary during the course of construction

1. The Construction Manager shall notify the RE, or BI, as appropriate, a minimum of 24 hours before the work is to begin.

2. The RE or BI, as appropriate, shall notify MMC immediately.

C. All other procedures described above shall apply, as appropriate.

V. Post Construction

A. Submittal of Draft Monitoring Report

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.

a. For significant paleontological resources encountered during monitoring, the Paleontological Recovery Program shall be included in the Draft Monitoring Report.

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, and submittal of such forms to the San Diego Natural History Museum with the Final Monitoring Report.

2. MMC shall return the Draft Monitoring Report to the PI for revisions or for preparation of the Final Report.
3. The PI shall submit revised Draft Monitoring Report to MMC for approval.
4. MMC shall provide written verification to the PI of the approved report.
5. MMC shall notify the RE or BI, as appropriate, of receipt of all Draft Monitoring Report submittals and approvals.

B. Handling of Fossil Remains

1. The PI shall be responsible for ensuring that all fossil remains collected are cleaned and catalogued.
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.

C. Curation of Fossil Remains: Deed of Gift and Acceptance Verification

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.
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.

D. Final Monitoring Report(s)

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.
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.

5.12.2.4 Impacts After Mitigation

Implementation of Mitigation Measure PR-1 would ensure that potential impacts to paleontological resources would be reduced to a level less than significant.

5.12.3 Conclusion

The proposed project site is underlain by geologic formations characterized as highly sensitive in regards to the potential presence of paleontological resources. Under the circumstances that deep foundations would be installed, the proposed project would have the potential to result in significant impacts to paleontological resources potentially present within the Stadium Conglomerate. However, implementation of Mitigation Measure PR-1 would reduce potential impacts to paleontological resources to a level less than significant.

5.13 Air Quality and Odor

This section of the EIR discusses the potential environmental impacts of the proposed project associated with air quality emissions.

5.13.1 Existing Conditions

5.13.1.1 Climate

The proposed project is located within the San Diego Air Pollution Control District (SDAPCD) of the San Diego Air Basin (SDAB), which includes 11 monitoring stations throughout the District. The distinctive climate of the SDAB is determined by its terrain and geographical location. The basin is a coastal plain with connecting broad valleys and low hills, bounded by the Pacific Ocean on the western quadrant with mountains and canyon forming the eastern boundary. The climate of the SDAPCD is strongly influenced by its proximity to the Pacific Ocean and the location of the semi-permanent high-pressure cells in the northeastern Pacific. With a Mediterranean-type climate, the proposed FPA area is characterized by warm, dry summers and cool winters with occasional rainy periods.

Due to the large size and topography within the SDAPCD there is a wide variation in temperature within short distances. The moderating effect of the ocean regulates the coastal temperature to ranges of 58°F to 71°F near the coast. Daytime temperatures in nearby valleys are much warmer in summer and nights are noticeably cooler in the winter.

The dominant daily wind pattern for the basin is westerly daytime sea breeze and an easterly nighttime land breeze. Generally, wind speed averages are about 25% higher in spring and summer than in fall and winter, with an average wind speed of about 7.0 miles per hours at the coast and slightly lower in the inland mountains. This regime is broken by occasional winter storms and infrequent strong, northeasterly “Santa Ana” winds from the mountains and deserts northeast of the basin. “Santa Ana” winds are typically hot, dry northerly winds which blow offshore at 15-20 mph, but can reach speeds over 60 mph.

Two types of temperature inversions (warmer air on top of cooler air) are created in the area: subsidence and radiational. The subsidence inversion is a regional effect created by the Pacific high in which air is heated as it is compressed when it flows from the high-pressure area to the low-pressure areas inland. This type of inversion generally forms at about 1,000 to 2,000 feet and can occur throughout the year, but it is most evident during the summer months. Surface inversions are formed by the more rapid cooling of air near the ground during the night, especially during winter. This type of inversion is typically lower and is generally accompanied by stable air. Both types of inversions limit the dispersal of air pollutants within the regional air shed, with the more stable air (low wind speeds, uniform temperatures), the lower the amount of pollutant dispersion.

5.13.1.2 Air Pollution Regulation

Through the Federal and State Clean Air Acts, the federal and state governments regulate the emission of airborne pollutants and have established ambient air quality standards for the protection of public health. The United States Environmental Protection Agency (U.S. EPA) is the federal agency designated to administer air quality regulation, while the California Air Resources Board (CARB) is the state equivalent in the California Environmental Protection Agency (CalEPA). Local control in air quality management is provided by CARB through multi-county and county-

level Air Pollution Control Districts (APCDs). CARB establishes statewide air quality standards and is responsible for the control of mobile emission sources, while the local APCDs are responsible for enforcing standards and regulating stationary sources. The ARB has established 15 air basins statewide. As described above the City of San Diego is located in the SDAB, which is under the jurisdiction of the SDAPCD.

Federal and state standards have been established for ozone (O_3), carbon monoxide (CO), nitrogen dioxide (NO_2), sulfur dioxide (SO_2), particulates less than 10 and 2.5 microns in diameter (PM_{10} and $PM_{2.5}$), and lead (Pb) (refer to Table 5.13-1). The local air quality management agency is required to monitor air pollutant levels to assure that air quality standards are met and, in the event they are not, to develop strategies to meet these standards. Depending on whether the standards are met or exceeded, the local air basin is classified as in "attainment" or "nonattainment."

Table 5.13-1
Federal and State Ambient Air Quality Standards

Pollutant	Averaging Time	Federal Primary Standards	California Standards
Ozone	1-Hour	---	0.09 ppm
	8-Hour	0.075 ppm	0.070 ppm
PM_{10}	24-Hour	150 µg/m^3	50 µg/m^3
	Annual	---	20 µg/m^3
$PM_{2.5}$	24-Hour	35 µg/m^3	---
	Annual	12 µg/m^3	12 µg/m^3
Carbon Monoxide	8-Hour	9.0 ppm	9.0 ppm
	1-Hour	35.0 ppm	20.0 ppm
Nitrogen Dioxide	Annual	0.053 ppm	0.030 ppm
	1-Hour	0.100 ppm	0.18 ppm
Sulfur Dioxide	24-Hour	---	0.04 ppm
	1-Hour	0.075 ppm	0.25 ppm
Lead	30-Day Average	---	1.5 µg/m^3
	3-Month Average	0.15 µg/m^3	---

Notes: ppm = parts per million; µg/m^3 = micrograms per cubic meter
Source: USEPA and CARB, 2014.

A brief description of the characteristics and health effects of ozone, carbon monoxide, nitrogen dioxide, and suspended particulates follows.

Ozone

Ozone (O_3) is produced by a photochemical reaction (triggered by sunlight) between nitrogen oxides (NO_x) and reactive organic gases (ROG). Ozone is a pungent, colorless, toxic gas with direct health effects on humans including respiratory and eye irritation and possible changes in lung functions. Groups most sensitive to ozone include children, the elderly, people with respiratory disorders, and people who exercise strenuously outdoors.

Carbon Monoxide

Carbon monoxide (CO) is a colorless, odorless, poisonous gas found in high concentrations only near the source (typically automobile traffic). Thus, elevated concentrations are usually only found near areas of high traffic volumes, particularly at congested intersections when automobiles are idling or in stop-and-go traffic. These localized high concentrations of CO are referred to as "CO hot spots". The health effects of CO are related to its affinity for hemoglobin in the blood. At high concentrations, CO reduces the amount of oxygen in the blood, causing heart difficulties in people with chronic diseases, reduces lung capacity and impairs mental abilities.

Nitrogen Dioxide

Nitrogen dioxide (NO_2) is an acute irritant and is a by-product of fuel combustion, with the primary source being motor vehicles and industrial boilers and furnaces. A relationship between NO_2 and chronic pulmonary fibrosis may exist, and an increase in bronchitis in young children at concentrations below 0.3 ppm may occur. NO_2 absorbs blue light and causes a reddish brown cast to the atmosphere and reduced visibility. It can also contribute to the formation of PM_{10} and acid rain.

Suspended Particulates

PM_{10} is particulate matter measuring no more than 10 microns in diameter, while $PM_{2.5}$ is fine particulate matter measuring no more than 2.5 microns in diameter. Suspended particulates are mostly dust particles, nitrates and sulfates. Both PM_{10} and $PM_{2.5}$ are by-products of fuel combustion and wind erosion of soil and unpaved roads, and are directly emitted into the atmosphere through these processes. Suspended particulates are also created in the atmosphere through chemical reactions. The characteristics, sources, and potential health effects associated with the small particulates (those between 2.5 and 10 microns in diameter) and fine particulates ($PM_{2.5}$) can be very different. The small particulates generally come from windblown dust and dust kicked up from mobile sources. The fine particulates are generally associated with combustion processes as well as being formed in the atmosphere as a secondary pollutant through chemical reactions. Fine particulate matter is more likely to penetrate deeply into the lungs and poses a health threat to all groups, but particularly to the elderly, children, and those with respiratory problems. More than half of the small and fine particulate matter that is inhaled into the lungs remains there. These materials can damage health by interfering with the body's mechanisms for clearing the respiratory tract or by acting as carriers of an absorbed toxic substance.

5.13.1.3 Regional Conditions

San Diego County is listed as a federal non-attainment area for ozone (8-hour standard), and a state non-attainment area for ozone (1-hour and 8-hour standards), PM_{10}, and $PM_{2.5}$. As shown in Table 5.13-2, the SDAB is in attainment for the state and federal standards for NO_2, CO, SO_2, and Pb. Non-attainment status for the SDAPCD is a result of several factors, primarily the naturally adverse meteorological conditions that limit the dispersion and diffusion of pollutants (surface and subsidence inversions); the limited capacity of the local airshed to eliminate pollutants from the air; and, the number, type, and density of emission sources within the SDAB.

Table 5.13-2
San Diego County Air Pollutant Attainment Status

Criteria Pollutant	Federal Designation	State Designation
Ozone (1-Hour)	Attainment*	Non-Attainment
Ozone (8-Hour)	Non-Attainment	Non-Attainment
Carbon Monoxide	Attainment	Attainment
PM_{10}	Unclassified**	Non-Attainment
$PM_{2.5}$	Attainment	Non-Attainment
Nitrogen Dioxide	Attainment	Attainment
Sulfur Dioxide	Attainment	Attainment
Lead	Attainment	Attainment
Sulfates	(No Federal Standard)	Attainment
Hydrogen Sulfide	(No Federal Standard)	Unclassified
Visibility	(No Federal Standard)	Unclassified

Notes: *The federal one hour standard of 12 ppm was in effect from 1979 through June 1, 2005. The revoked standard is referenced here because it was employed for such a long period and because this benchmark is addressed in the SIPs.
**At the time of designation, if the available data does not support a designation of attainment or non-attainment, the area is designated as unclassifiable.

Source: City of San Diego, 2011.

5.13.1.4 Local Ambient Air Quality

The SDAPCD monitors air quality conditions at locations throughout the SDAB. The closest ambient monitoring station to the proposed project is the Kearny Mesa monitoring station, which measures O_3, CO, NO_2, PM_{10} and $PM_{2.5}$. The closest station that measures SO_2 is the downtown San Diego monitoring station. A summary of the data recorded at the Kearny Mesa monitoring station from 2010 through 2012 is presented in Table 5.13-3 below.

Table 5.13-3
Ambient Air Quality Data

Pollutant	2010	2011	2012
Ozone, ppm – Worst Hour	0.100	0.097	0.050
Number of days of State 1-hour exceedances (>0.09 ppm)	2	1	0
Number of days of Federal exceedances (>0.075 ppm)	0	1	0
Particulate Matter < 10 microns, μg/m^3 Worst 24 Hours	32	47	22
Number of samples of State exceedances (>50 μg/m^3)	0	0	0
Number of samples of Federal exceedances (>150 μg/m^3)	0	0	0
Particulate Matter <2.5 microns, μg/m^3 Worst 24 Hours	18.7	29.9	20.0
Number of samples of State exceedances (>50 μg/m^3)	N/A	N/A	N/A
Number of samples of Federal exceedances (>150 μg/m^3)	0	0	0

Source: SDAPCD, 2014.

As shown in Table 5.13-3 above, the state ozone standards were exceeded in 2010 and both the federal and state ozone standards were exceeded at the Kearny Mesa monitoring station in 2011. The data from the monitoring station indicates that air quality is in attainment of all other air quality standards.

5.13.1.5 Air Quality Management Plan/Regional Air Quality Strategy

The Federal Clean Air Act Amendments (CAAA) mandate that states submit and implement a State Implementation Plan (SIP) for areas not meeting air quality standards. The SIP includes pollution control measures to demonstrate how the standards will be met through those measures. The SIP is established by incorporating measures established during the preparation of Air Quality Management Plans (AQMPs) and adopted rules and regulations by each local APCD and AQMD, which are submitted for approval to CARB and the U.S. EPA. The goal of an AQMP is to reduce pollutant concentrations below the National Ambient Air Quality Standards (NAAQS) through the implementation of air pollutant emissions controls.

The San Diego Regional Air Quality Strategy (RAQS) was developed pursuant to CAAA requirements. The RAQS was initially adopted in 1991 and was updated in 1995, 1998, 2001, 2004, and most recently in 2009 (SDAPCD, 2009). The RAQS identifies feasible emission control measures to provide progress in San Diego County toward attaining the State ozone standard. The pollutants addressed in the RAQS are volatile organic compounds/reactive organic gases (VOC/ROG) and nitrogen oxides (NO_x), precursors to the photochemical formation of ozone (the primary component of smog). The RAQS was initially adopted by the San Diego County Air Pollution Control Board on June 30, 1992, and amended on March 2, 1993, in response to ARB comments (2009 Revision of the Regional Air Quality Strategy, 2009). At present, no attainment plan for PM_{10} or $PM_{2.5}$ is required by the state regulations. However, SDAPCD has adopted measures to reduce particulate matter in San Diego County. These measures range from regulation against open burning to incentive programs that introduce cleaner technology.

The RAQS relies on information from CARB and SANDAG, including mobile and area source emissions, as well as information regarding projected growth in the County, to project future emissions and then determine from that the strategies necessary for the reduction of emissions through regulatory controls. ARB mobile source emission projections and SANDAG growth projections are based on population and vehicle trends and land use plans developed by the cities and the county as part of the development of the individual general plans. As such, projects that propose development consistent with the growth anticipated by the general plans would be consistent with the RAQS. In the event that a project would propose development that is less dense than anticipated within the general plan, the project would likewise be consistent with the RAQS. If a project proposes development that is greater than that anticipated in the General Plan and SANDAG's growth projections, the project might be in conflict with the RAQS and SIP, and might have a potentially significant impact on air quality.

The SIP relies on the same information from SANDAG to develop emission inventories and emission reduction strategies that are included in the attainment demonstration for the air basin. The SIP also includes rules and regulations that have been adopted by the SDAPCD to control emissions from stationary sources. These SIP-approved rules may be used as a guideline to determine whether a project's emissions would have the potential to conflict with the SIP and thereby hinder attainment of the NAAQS for ozone.

5.13.1.6 Sensitive Receptors

Ambient air quality standards have been established to represent the levels of air quality considered sufficient, with an adequate margin of safety, to protect public health and welfare. They are designed to protect that segment of the public most susceptible to respiratory distress, such as children; the elderly; persons engaged in strenuous work or exercise; and, people with cardiovascular and chronic respiratory diseases. The project area is currently comprised of commercial, industrial, and open space uses. There are no sensitive receptors in close proximity to the project site.

5.13.2 Issue 1

Issue 1: Would the proposed project affect the ability of the RAQS or other regional plan to meet federal and state clean air standards?

5.13.2.1 Impact Analysis

According to the City of San Diego's Significance Determination Thresholds, a significant impact to air quality and odor would occur if the proposed project would:

- *Conflict with or obstruct implementation of the applicable air quality plan;*
- *Violate any air quality standard or contribute substantially to an existing or projected air quality violation;*
- *Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is in non-attainment under an applicable federal or state ambient air quality standard (including releasing emissions that exceed quantitative thresholds for ozone precursors);*
- *Expose sensitive receptors to substantial pollutant concentrations including air toxics such as diesel particulates;*

- *Create objectionable odors affecting a substantial number of people; or*
- *Release substantial quantities of air contaminants beyond the boundaries of the premises upon which the stationary source emitting the contaminants is located.*

The SDAPCD has established screening level thresholds (screening criteria) for evaluating air quality emissions (Rule 20.1 et seq.). The City of San Diego utilizes the SDAPCD Pollutant Thresholds for Stationary Sources, shown in Table 5.13-4 below. These thresholds are based on Air Quality Impact Analysis (AQIA) trigger levels for new or modified stationary sources found in SDAPCD Rule 20.2 and ROG thresholds used by the South Coast Air Quality Management District (SCAQMD) and the Monterey Bay APCD (MBAPCD), which has similar federal and state attainment status as San Diego.

Table 5.13-4
SDAPCD Thresholds of Significance for Air Quality Impacts

	Thresholds Significance		
Pollutant	Pounds Per Hour	Pounds Per Day	Tons Per Year
Carbon Monoxide (CO)	100	**550**	100
Oxides of Sulfur (SO_x)	25	**250**	40
Volatile Organic Compounds (VOC's)[(1)]	---	**137**	15
Reactive Organic Gases (ROG's)	---	**137**	15
Oxides of Nitrogen (NO_x)	25	**250**	40
Particulate Matter (PM_{10})	---	**100**	15

Notes 1=VOC thresholds based upon SCAQMD levels per SDAPCE/DPLU requirements (9/01).
Source: SDAPCD Rule 1501, 20.2(d)(2).

As discussed above, the SIP is the document that outlines the State's strategies for attaining and maintaining the NAAQS. The SDAPCD is responsible for developing the strategies for the SDAB, and has developed the RAQS for attaining the 8-hour NAAQS for O3. The RAQS sets for the plans and programs to try to achieve attainment status. If a project proposes development that is consistent with the growth anticipated in the General Plan and SANDAG's growth projections, the project would be consistent with the RAQS and SIP. The project proposes a mix of residential and retail uses in addition to existing commercial office and light industrial uses, and complies with the Mission Valley Community Plan that allows for a Multi-Use Option. The proposed project is consistent with the Mission Valley Community Plan and the City's General Plan and would develop under the existing zone and land use designation; therefore, a Rezone and Community Plan Amendment would not be required. Accordingly, the project is consistent with the City's General Plan and would therefore be consistent with the RAQS and SIP. The project would not conflict with or obstruct implementation of the RAQS or SIP, and thus would not affect the ability of the RAQS or other regional plans to meet federal and state clean air standards. Accordingly, because the proposed project would not conflict with or obstruct implementation of the RAQS or other regional plans, impacts would be less than significant.

5.13.2.2 Significance of Impact

The proposed project is consistent with the Mission Valley Community Plan and City's General Plan, and thus would be consistent with the RAQS and SIP. As such, the proposed project would not affect the ability of the RAQS or other regional plans to meet federal and state clean air standards. Therefore, impacts would be less than significant.

5.13.2.3 Mitigation, Monitoring, and Reporting

Implementation of the proposed project would not conflict with or obstruct implementation of the applicable air quality plan; therefore, no mitigation measures are required.

5.13.2.4 Significance After Mitigation

No mitigation would be required; therefore, there would be no impacts after mitigation.

5.13.3 Issue 2

Issue 2: Would the proposed project violate any air quality standard or contribute substantially to an existing or projected air quality violation?

5.13.3.1 Impact Analysis

A. Construction Emissions

Construction of the proposed project would generate temporary air pollutant emissions. These impacts are associated with fugitive dust (PM_{10} and $PM_{2.5}$) and exhaust emissions from heavy construction vehicles, in addition to ROGs that would be released during the drying phase of architectural coatings.

Construction emissions modeling includes air emissions associated with site preparation, grading, building construction, paving, and application of architectural coatings. The City of San Diego Municipal Code (SDMC) Section 142.0710 requires that during construction, "air contaminants including smoke, charred paper, dust, soot, grime, carbon, noxious acids, toxic fumes, gases, odors, and particulate matter, or any emissions that endanger human health, cause damage to vegetation or property, or cause soiling shall not be permitted to emanate beyond the boundaries of the premises upon which the use emitting the contaminants is located." The estimated annual construction emissions are provided in Table 5.13-5 below.

Table 5.13-5
Estimated Maximum Annual Construction Emissions (lbs/day)

Year	ROG	NO_x	CO	SO_2	PM_{10} (Dust)	PM_{10} (Exhaust)	PM_{10} (Total)	$PM_{2.5}$ (Dust)	$PM_{2.5}$ (Exhaust)	$PM_{2.5}$ (Total)
2015 (Unmitigated)	21.88	60.94	32.09	0.07	215.64	2.68	218.31*	45.06	2.46	47.53
2016 (Unmitigated)	21.88	60.94	32.09	0.07	97.18	2.68	99.86	20.33	2.46	22.79
Significance Threshold (lbs/day)	75	250	550	250	-	-	100	-	-	55
SDAPCD/Coachella Valley Impact	**No**	**No**	**No**	**No**	-	-	**No**	-	-	**No**

Notes: All calculations were made with URBEMIS2007 ver. 9.2.4. Trip generation information from the traffic study (LLG, 2014). Assumes compliance with SDAPCD Rule 67.0 – Architectural Coatings. * Water twice per day to reduce PM_{10}.
Source: Ldn Consulting, Inc., 2014.

As shown in Table 5.13-5 above, construction of the proposed project would not exceed SDAPCD thresholds for criteria pollutants. In addition, the proposed project would have to comply with local, state and federal air quality regulations during construction. In compliance with SDMC Section 142.0710, particulate matter emissions may be

reduced utilizing the standard construction BMPs, including but not limited to minimization of disturbance, soil dewatering, and street sweeping.

Furthermore, the proposed project would be required to demonstrate compliance with SDAPCD regulations and associated BMPs related to potential construction emissions. Compliance with SDMC Section 142.0710 would reduce the potential for pollutants to affect nearby sensitive receptors and would ensure that substantial quantities of air contaminants would not be emitted beyond the boundaries of the project site. Therefore, adherence to applicable SDAPCD and City of San Diego regulations during construction would reduce potential construction-related air quality impacts to a level less than significant.

B. Operational Emissions

Operational emissions associated with proposed project would include those from mobile sources (vehicle trip) and area sources (electricity and natural gas consumption). The estimated operational emissions for both the summer and winter scenarios are provided in Table 5.13-6 below.

Table 5.13-6
Estimated Operational Emissions (lbs/day)

	Estimated Emissions (lbs/day)					
	ROG	**NO_x**	**CO**	**SO_x**	**PM_{10}**	**$PM_{2.5}$**
Summer Scenario						
Area	10.17	1.58	3.76	0.00	0.01	0.01
Mobile	8.21	9.43	88.41	0.09	15.77	3.06
Subtotal	*18.38*	*11.01*	*92.17*	*0.09*	*15.78*	*3.07*
SDAPCD Threshold	**75**	**250**	**550**	**250**	**100**	**55**
Exceed Threshold?	**No**	**No**	**No**	**No**	**No**	**No**
Winter Scenario						
Area	9.92	1.54	0.67	0.00	0.00	0.00
Mobile	7.90	13.78	94.69	0.08	15.77	3.06
Subtotal	*17.82*	*15.132*	*95.136*	*0.08*	*15.77*	*3.06*
SDAPCD Threshold	**75**	**250**	**550**	**250**	**100**	**55**
Exceed Threshold?	**No**	**No**	**No**	**No**	**No**	**No**

Notes: All calculations were made with URBEMIS2007 ver. 9.2.4. Trip generation information from the traffic study (LLG, 2014). Assumes compliance with SDAPCD Rule 67.0 – Architectural Coatings.
Source: Ldn Consulting, Inc., 2014.

As shown in Table 5.13-6 above, the proposed project would not exceed SDAPCD thresholds for any criteria pollutants. As such, operational air quality impacts would be less than significant.

Local Carbon Monoxide "Hot Spots"

Air pollutant emissions related to project traffic have the potential to create new, or worsen existing localized air quality with respect CO. As previously discussed, carbon monoxide is a colorless, odorless, poisonous gas that may be found in high concentrations near areas of high traffic volumes. CO emissions are a function of vehicle idling time, meteorological conditions, and traffic flow. Although CO is not expected to be a major air quality concern in San Diego, elevated CO levels can occur at or near intersections that experience severe traffic congestion. These increased carbon monoxide "Hot Spots" are determined through the utilization of the ITS Transportation Project-Level Carbon Monoxide Protocol (Caltrans 1998) as well as the County of San Diego's Guidelines for Determining Significance for Air Quality.

In the event the proposed project traffic adds vehicular trips to either an intersection that operates at LOS E or F or any intersection where the project trips re-classifies the intersection level of service to LOS E or F and when peak-hour trips exceed 3,000 the proposed project must quantify CO levels.

As further discussed in Section 5.2 – Transportation/Traffic, the proposed project would add peak hour trips to one intersection which exists at LOS F, the Hotel Circle S./EB I-8 Ramps intersection. In addition, the proposed project would increase the delay at this intersection by 6.9 seconds under the Existing + Project scenario and 7.0 seconds under the Near-Term + Project scenario, which would exceed the City's threshold for allowable increase in delay at a LOS F intersection. However, as shown in Figures 5.2-5, 5.2-6, and 5.2-7 of Section 5.2 of this EIR depict Existing + Project and Near-Term + Project, volumes for the intersections including the Hotel Circle S./EB I-8 Ramps intersection), peak hour volumes at the Hotel Circle S./EB I-8 Ramps intersection would not exceed 3,000 peak hour trips for either the Existing + Project or Near-Term + Project scenarios. As such, the proposed project would not meet the criteria requiring a CO "Hot Spot" analysis. Therefore, impacts associated with a CO "Hot Spot" would be less than significant.

5.13.3.2 Significance of Impact

The proposed project would not generate air pollutant emissions that would exceed SDAPCD thresholds for any criteria pollutants during either construction or operation. In addition, compliance with SDAPCD regulations, the SDMC, and implementation of associated BMPs would ensure impacts would remain less than significant. The proposed project would result in an increase in delay at the Hotel Circle S./EB I-8 Ramps intersection exceeding the City's threshold for allowable increase in delay at a LOS F intersection under the Existing + Project and Near-Term + Project scenarios. However, peak hour volumes at this intersection would not exceed 3,000 peak hour trips for either scenario. As such, a quantitative CO "Hot Spot" analysis is not required with the implementation of the proposed project. Therefore, construction and operational air quality impacts would be less than significant.

5.13.3.3 Mitigation, Monitoring, and Reporting

With adherence to SDAPCD regulations, compliance with the SDMC, and implementation of associated construction BMPs, the proposed project would not result in any significant construction or operational air quality impacts; therefore, no mitigation measures are required.

5.13.3.4 Significance After Mitigation

No mitigation would be required; therefore, there would be no impacts after mitigation.

5.13.4 Issue 3

Issue 3: Would the proposed project expose sensitive receptors to substantial pollutant concentrations including air toxics such as diesel particulates?

5.13.4.1 Impact Analysis

As shown in Tables 5.13-5 and 5.13-6 above, the proposed project would not result in any significant construction air quality impacts, which is the typical source of air toxic emissions. In addition, compliance with SDMC Section 142.0710 which states, "air contaminants including smoke, charred paper, dust, soot, grime, carbon, noxious acids,

toxic fumes, gases, odors, and particulate matter, or any emissions that endanger human health, cause damage to vegetation or property, or cause soiling shall not be permitted to emanate beyond the boundaries of the premises upon which the use emitting the contaminants is located," would reduce the potential for pollutants to affect nearby sensitive receptors and would ensure that substantial quantities of air contaminants would be not emitted beyond the boundaries of the project site. Therefore, it is anticipated that impacts to sensitive receptors would be less than significant.

5.13.4.2 Significance of Impact

The proposed project would not result in any significant construction air quality impacts. In addition, compliance with SDMC Section 142.0710 would reduce the potential for pollutants to affect nearby sensitive receptors. Therefore, it is anticipated that impacts to sensitive receptors would be less than significant.

5.13.4.3 Mitigation, Monitoring, and Reporting

Construction of the proposed project would be required to comply with SDMC Section 142.0710; therefore, no mitigation measures are required.

5.13.4.4 Significance After Mitigation

No mitigation is required; therefore, there would be no impacts after mitigation.

5.13.5 Conclusion

The proposed project is consistent with the Mission Valley Community Plan and City's General Plan, and thus would be consistent with the RAQS and SIP. As such, the proposed project would not affect the ability of the RAQS or other regional plans to meet federal and state clean air standards. In addition, implementation of the proposed project would not generate air pollutant emissions during construction or operation that would exceed SDAPCD thresholds for any criteria pollutants, especially those for which the SDAB is currently under federal and/or state non-attainment. Furthermore, compliance with the SDAPCD regulations, SDMC, and implementation of BMPs, would ensure that air quality impacts during construction would be less than significant. Therefore, air quality impacts during construction and operation of the proposed project would be less than significant.

5.14 Noise

This section of the EIR discusses the potential environmental impacts of the proposed project associated with noise.

5.14.1 Existing Conditions

The project site is the location of an approved urban development which currently consists of commercial office and light industrial uses. The project is site is located directly north of Interstate 8 (I-8) and west of State Route 163 (SR-163) in the Mission Valley Community. Directly adjacent to project site is the Town and Country Resort to the west and the San Diego River to the north. Both of these would be considered noise sensitive land uses/receptors.

5.14.1.1 Noise Background

Noise is generally defined as loud, unpleasant, unexpected, or undesired sound that is typically associated with human activity and that interferes with or disrupts normal activities. The human environment is characterized by a certain consistent noise level that varies by location and is termed ambient noise. Although exposure to high noise levels has been demonstrated to cause hearing loss, the principal human response to environmental noise is annoyance. The response of individuals to similar noise events is diverse and influenced by the type of noise, perceived importance of the noise and its appropriateness in the setting, time of day and type of activity during which the noise occurs, and sensitivity of the individual.

Sound is a physical phenomenon consisting of minute vibrations that travel through a medium, such as air, and are sensed by the human ear. Sound is generally characterized by several variables, including frequency and intensity. Frequency describes the sound's pitch and is measured in cycles per second, or hertz (Hz), whereas intensity describes the sound's loudness and is measured in decibels (dB). Decibels are measured using a logarithmic scale. A sound level of 0 dB is approximately the threshold of human hearing and is barely audible under extremely quiet listening conditions. Normal speech has a sound level of approximately 60 dB. Sound levels above about 120 dB begin to be felt inside the human ear as discomfort and eventually as pain at still higher levels.

The minimum change in the sound level of individual events that an average human ear can detect is about 3 dB. The average person perceives a change in sound level of about 10 dB as a doubling (or halving) of the sound's loudness; this relation holds true for sounds of any loudness. Sound levels of typical noise sources and environments are provided in Table 5.4-1, Sound Levels of Typical Noise Sources and Noise Environments.

Because community noise fluctuates over time, a single measure called the Equivalent Sound Level (Leq) is often used to describe the time-varying character of community noise. The Leq is the energy-averaged A-weighted sound level during a measured time interval. It is equal to the level of continuous steady sound containing the same total acoustical energy over the averaging time period as the actual time-varying sound. Additionally, it is often desirable to know the acoustic range of the noise source being measured. This is accomplished through the Lmax and Lmin indicators, which represent the root-mean-square maximum and minimum noise levels obtained during the measurement interval. The Lmin value obtained for a particular monitoring location is often called the "acoustic floor" for that location.

5.14.1.2 Existing Noise Standards

A. Construction Noise

Per San Diego Municipal Code (SDMC) Section 59.5.0404, construction noise levels measured at or beyond the property lines of any property zoned residential shall not exceed an average sound level greater than 75 decibels (dB) during the 12-hour period from 7:00 a.m. to 7:00 p.m. Further, construction activity is prohibited between the hours of 7:00 p.m. of any day and 7:00 a.m. of the following day, or on legal holidays as specified in Section 21.04 of the San Diego Municipal Code. Exceptions are allowed and subject to a permit granted by the Noise Abatement and Control Administrator.

B. Exterior Noise

Noise standards are expressed in CNEL, a 24-hour A-weighted average decibel level (dBA) that accounts for frequency correction and the subjective response of humans to noise by adding 5 dBA and 10 dBA to the evening and nighttime hours, respectively.

The City of San Diego requires new projects to meet exterior noise level standards as established in the Land Use Noise Compatibility Guidelines in the City's Noise Element of the General Plan, which specifies compatibility standards for different categories of land use. Table 5.14-1 provides the allowable noise levels by land use as identified in the City's General Plan. As shown, the compatible noise level for noise sensitive land uses is 60 dBA CNEL. Compatibility indicates that standard construction methods will attenuate exterior noise to an acceptable indoor noise level and people can carry out outdoor activities with minimal noise interference.

Table 5.14-2 provides the thresholds of significance for uses affected by traffic noise. As shown, the City has a traffic noise significance threshold of 65 dBA CNEL or less at residential exterior usable spaces.

The Noise Element of the General Plan states that exterior noise levels ranging between 65 and 70 CNEL are considered "conditionally compatible" for multiple units, mixed-use commercial/residential, live work, and group living accommodations. For single-family units, mobile homes, and senior housing, exterior noise levels ranging between 60 and 65 CNEL are considered "conditionally compatible." Conditionally compatible uses are permissible, provided interior noise levels will not exceed 45 CNEL. Projects sited on land that falls into the "conditionally compatible" noise environment would require an acoustical study.

Although not generally considered compatible, the General Plan also conditionally allows multiple unit and mixed-use residential uses up to 75 CNEL in areas affected primarily by motor vehicle traffic noise with existing residential uses. Any future residential use with exterior noise levels above the 70 CNEL must include noise attenuation measures to ensure an interior noise level of 45 CNEL and be located in an area where a land use plan allows multiple unit and mixed-use residential uses.

Section 59.5.0101 et seq. of the SDMC, the Noise Abatement and Control Ordinance, regulates the making and creating of disturbing, excessive, or offensive noises within the City limits. Sound level limits are established for various types of land uses and are measured in one-hour averages. The one-hour, A-weighted equivalent sound level, dBA Leq, is the energy average of the A-weighted sound levels occurring during a one-hour period. The ordinance states that it is unlawful for any person to cause noise by any means to the extent that the one hour

Table 5.14-1
City of San Diego Land Use
Noise Compatibility Guidelines

Land Use Category	Exterior Noise Exposure (dBA CNEL)				
	60	65	70	75	
Open Space and Parks and Recreational					
Community & Neighborhood Parks; Passive Recreation					
Regional Parks; Outdoor Spectator Sports, Golf Courses; Athletic Fields; Outdoor Spectator Sports, Water Recreational Facilities; Horse Stables; Park Maint. Facilities					
Agricultural					
Crop Raising & Farming; Aquaculture, Dairies; Horticulture Nurseries & Greenhouses; Animal Raising, Maintain & Keeping; Commercial Stables					
Residential					
Single Units; Mobile Homes; Senior Housing		45			
Multiple Units; Mixed-Use Commercial/Residential; Live Work; Group Living Accommodations **For uses affected by aircraft noise, refer to Policies NE-D.2. & NE-D.3.*		45	45*		
Institutional					
Hospitals; Nursing Facilities; Intermediate Care Facilities; Kindergarten through Grade 12 Educational Facilities; Libraries; Museums; Places of Worship; Child Care Facilities		45			
Vocational or Professional Educational Facilities; Higher Education Institution Facilities (Community or Junior Colleges, Colleges, or Universities)		45	45		
Cemeteries					
Sales					
Building Supplies/Equipment; Food, Beverages & Groceries; Pets & Pet Supplies; Sundries, Pharmaceutical, & Convenience Sales; Wearing Apparel & Accessories			50	50	
Commercial Services					
Building Services; Business Support; Eating & Drinking; Financial Institutions; Assembly & Entertainment; Radio & Television Studios; Golf Course Support			50	50	
Visitor Accommodations		45	45	45	
Offices					
Business & Professional; Government; Medical, Dental & Health Practitioner; Regional & Corporate Headquarters			50	50	
Vehicle and Vehicular Equipment Sales and Services Use					
Commercial or Personal Vehicle Repair & Maintenance; Commercial or Personal Vehicle Sales & Rentals; Vehicle Equipment & Supplies Sales & Rentals; Vehicle Parking					
Wholesale, Distribution, Storage Use Category					
Equipment & Materials Storage Yards; Moving & Storage Facilities; Warehouse; Wholesale Distribution					
Industrial					
Heavy Manufacturing; Light Manufacturing; Marine Industry; Trucking & Transportation Terminals; Mining & Extractive Industries					
Research & Development				50	

	Compatible	Indoor Uses	Standard construction methods should attenuate exterior noise to an acceptable indoor noise level. Refer to Section I.
		Outdoor Uses	Activities associated with the land use may be carried out.
	Conditionally Compatible	Indoor Uses	Building structure must attenuate exterior noise to the indoor noise level indicated by the number for occupied areas. Refer to Section I.
		Outdoor Uses	Feasible noise mitigation techniques should be analyzed and incorporated to make the outdoor activities acceptable. Refer to Section I.
	Incompatible	Indoor Uses	New construction should not be undertaken.
		Outdoor Uses	Severe noise interference makes outdoor activities unacceptable.

Table 5.14-2
City of San Diego Traffic Noise Significance Thresholds

Structure or Proposed Use that would be impacted by Traffic Noise	Interior Space	Exterior Useable Space†	General Indication of Potential Significance
Single-family detached	45 dB	65 dB	Structure or outdoor useable area† is < 50 feet from the center of the closest (outside) lane on a street with existing or future ADTs > 7500
Multi-family, schools, libraries, hospitals, day care, hotels, motels, parks, convalescent homes	Development Services Department (DSD) ensures 45 dB pursuant to Title 24	65 dB	
Offices, Churches, Business, Professional Uses	N/A	70 dB	Structure or outdoor useable area is < 50 feet from the center of the closest lane on a street with existing or future ADTs > 20,000
Commercial, Retail, Industrial, Outdoor Spectator Sports Uses	N/A	75 dB	Structure or outdoor useable area is < 50 feet from the center of the closest lane on a street with existing or future ADTs > 40,000

Source: City of San Diego, 2011
† If a project is currently at or exceeds the significance thresholds for traffic noise described above and noise levels would result in less than a 3 dB increase, then the impact is not considered significant.

average sound level exceeds the applicable limit given for that land use. The sound level limit at a location on a boundary between two zoning districts is the arithmetic mean of the respective limits for the two districts.

C. Interior Noise

Noise-sensitive residential/habitable interior spaces have an interior standard of 45 CNEL, as stated in the City's CEQA Significance Determination Thresholds and the California Noise Insulation Standards. The Significance Determination Thresholds indicate that for multi-family development, exterior noise levels would be considered significant if future projected traffic would result in noise levels exceeding 65 CNEL at exterior usable areas or interior noise levels exceeding 45 CNEL.

The City assumes that standard construction techniques will provide a 15 dB reduction of exterior noise levels to an interior receiver. Given this assumption, standard building construction could be assumed to result in interior noise levels of 45 CNEL or less when exterior noise sources are 60 CNEL or less. When exterior noise levels are greater than 60 CNEL, consideration of specific non-standard building construction techniques is required.

D. California Code of Regulations

Title 24, Chapter 12, Section 1207, of the California Code of Regulations (CCR) requires that interior noise levels, attributable to exterior sources, not exceed to 45 CNEL in any habitable room within a residential structure, other than single-family. A habitable room in a building is used for living, sleeping, eating or cooking. Bathrooms, closets, hallways, utility spaces, and similar areas, are not considered habitable spaces. An acoustical study is required for proposed multiple-unit residential and hotel/motel structures within areas where the exterior CNEL noise contours exceed 60 CNEL. The studies must demonstrate that the design of the building will reduce interior noise to 45 CNEL or lower in habitable rooms. If compliance requires windows to be inoperable or closed, the structure must include ventilation or air-conditioning (24 CCR 1207 2010).

5.14.1.1 Existing Noise Sources

The primary existing noise sources in the project area are transportation and stationary sources. The most common source of transportation noise in the project area is motor vehicle (e.g., automobiles, buses, trucks, and motorcycles) operation along the arterial roadways. I-8 is located generally along the southern boundary of the project site. Motor vehicle noise is characterized by a high number of individual events which often create a sustained noise level and is the primary noise concern associated with the project site because the proposed project would introduce new residential and retail uses in addition to existing commercial office and light industrial uses.

5.14.2 Issue 1

Issue 1: Would the proposed project result in or create a significant increase in the existing ambient noise levels?

5.14.2.1 Impact Analysis

Based on the City of San Diego's CEQA Significance Determination Thresholds, a significant noise impact would occur if implementation of the proposed project would:

- *Result in a substantial increase in the existing ambient noise levels;*

According to the General Plan, noise sensitive land uses include, but are not necessarily limited to, residential uses, hospitals, nursing facilities, intermediate care facilities, child educational facilities, libraries, museums, places of worship, child care facilities, and certain types of passive recreational parks and open space.

Construction Noise

As mentioned above, the project site is adjacent to the Town and Country Resort and the San Diego River. Construction of the proposed project has the potential to result in temporary noise impacts to adjacent sensitive biological resources. No other sensitive receptors are located within close proximity to the project site. The magnitude of the impact would depend on the type of construction activity and equipment, duration of the construction phase, and the distance between the noise source and receiver. Although Least Bell's Vireo was not detected during protocol surveys conducted for the proposed project, potentially suitable habitat exists along the adjacent San Diego River. As such, noise generated during construction has the potential to result in temporary impacts to sensitive biological resources should construction occur during the avian breeding season.

However, construction noise is regulated by the City of San Diego Municipal Code (SDMC) (Section 59.5.0404). This ordinance limits the hours of construction activities to occur between 7:00 am and 7:00 pm and establishes performance standards that limit construction noise. As such, compliance with Section 59.5.0404 of the SDMC would reduce potential significant noise impacts generated during construction of the proposed project to a less than significant level. In regards to sensitive biological resources, implementation of Mitigation Measures LU-1 and BR-1, which includes the MHPA Land Use Adjacency Guidelines and measures to avoid any direct impacts to nesting birds. As such, compliance with the SDMC and implementation of Mitigation Measures LU-1 and BR-1 would reduce construction related noise impacts to a less than significant level.

Operational Noise

A significant operational noise impact would occur if ambient noise levels would increase by 3 dBA CNEL or greater in areas with ambient noise levels already exceeding 65 dBA CNEL. Because mobile/traffic noise levels are calculated on a logarithmic scale, a doubling of the traffic noise or acoustical energy results in a noise level increase of 3 dBA. Therefore the doubling of the traffic volume, without changing the vehicle speeds or mix ratio, results in a noise increase of 3 dBA. Mobile noise levels radiate in an almost oblique fashion from the source and drop off at a rate of 3 dBA for each doubling of distance under hard site conditions and at a rate of 4.5 dBA for soft site conditions. Hard site conditions consist of concrete, asphalt and hard pack dirt while soft site conditions exist in areas having slight grade changes, landscaped areas and vegetation. On the other hand, fixed/point sources radiate outward uniformly as sound travels away from the source. Their sound levels attenuate or drop off at a rate of 6 dBA for each doubling of distance.

To determine if direct or cumulative off-site noise level increases associated with the development of the proposed project would create noise impacts, the traffic volumes for the existing conditions were compared with the traffic volume increase of existing plus the proposed project. As further discussed in Section 5.2 – Transportation/Traffic of this EIR, the proposed project will generate 1,140 daily trips with a worst-case peak hour volume of 101 trips (PM). The existing average daily traffic (ADT) volumes for the project study area range from 8,170 to 16,800. Typically it requires a project to double (or add 100%) traffic volumes to result in a direct impact of 3 dBA CNEL increase or be a major contributor to the cumulative traffic volumes. The project will add less than a 15% increase to the existing roadway volumes and no direct impacts are anticipated. As such, the increased traffic volumes associated with the proposed project would not result in a significant increase in ambient noise levels. Therefore, operational noise impacts would be less than significant.

5.14.2.2 Significance of Impact

Construction of the proposed project has the potential to result in temporary noise impacts to adjacent sensitive receptors. However, the proposed project would be subject to the SDMC Sections 59.5.0404 and 59.5.0101 et seq., policies of the General Plan, and other applicable noise regulations. In addition, implementation of Mitigation Measures LU-1 and BR-1 would address potential impacts to sensitive biological resources. The proposed project would not result in any operational noise impacts. Therefore, construction and operational noise impacts would be less than significant.

5.14.2.3 Mitigation, Monitoring, and Reporting

Conformance with federal, state, and local noise regulations would generally preclude significant noise impacts for the proposed project. Such compliance with the above referenced City codes, along with other federal, state, and local regulations, is required of all projects and is not considered to be mitigation. Implementation of Mitigation Measures LU-1 and BR-1 would reduce potential temporary noise impacts to sensitive biological resources to a less than significant level. No additional mitigation measures are required.

5.14.2.4 Impacts After Mitigation

No additional mitigation is required; therefore, there would be no impacts after mitigation.

5.14.3 Issue 2

Issue 2: Would the proposed project result expose people to noise levels which exceed the City's adopted noise ordinance or are incompatible with Table NE-3 of the City of San Diego's General Plan?

5.14.3.1 Impact Analysis

Based on the City of San Diego's CEQA Significance Determination Thresholds, a significant noise impact would occur if implementation of the proposed project would:

- *Result in the exposure of noise-sensitive land uses to future noise levels which exceed those established in the adopted General Plan, noise ordinance, ALUCPs, or applicable standards of other agencies;*
- *Result in increased land use incompatibilities associated with noise.*

Due to the project sites adjacency to the I-8 and SR-163 freeways, the proposed project has the potential to result in interior noise levels that exceed the City of San Diego General Plan Noise Compatibility Guidelines requirements of 45 dBA CNEL. To avoid a potential inconsistency with the General Plan Noise Element, as a condition of project approval, an interior noise analysis would be required to be approved by the City's Development Services Department upon issuance of a building permit. Upgraded windows and/or doors with Sound Transmission Class (STC) ratings of 30 or higher may be necessary. If the interior noise limit can be achieved only with the windows closed, the building design must include mechanical ventilation that meets California Building Code (CBC) requirements. Worst-case noise levels, either existing or future, must be used. Future noise level predictions must be for a date at least 10 years from the time of the building permit application. With the implementation of the findings of the interior noise analysis, interior noise levels in habitable rooms would be 45 dBA CNEL or below and comply with the California Code of Regulations, Title 24: Noise Insulation Standard City of San Diego General Plan Noise Compatibility Guidelines requirement. The proposed project would result in a less than significant interior noise impact with project features incorporated in accordance with the interior noise analysis.

5.14.3.2 Significance of Impact

The proposed project has the potential to result in interior noise levels that exceed the City of San Diego General Plan Noise Compatibility Guidelines requirements of 45 dBA CNEL due to the project sites proximity to the I-8 and SR-163 freeways. However, as a condition of project approval, an interior noise analysis would be prepared and required to be approved by the City's Development Services Department. With the implementation of the findings of the interior noise analysis, interior noise levels in habitable rooms would be 45 dBA CNEL or below and comply with the California Code of Regulations, Title 24: Noise Insulation Standard City of San Diego General Plan Noise Compatibility Guidelines requirement. Therefore, the proposed project would not expose people to noise levels which exceed the City's adopted noise ordinance or are incompatible with Table NE-3 of the City of San Diego's General Plan, and impacts would be less than significant.

5.14.3.3 Mitigation, Monitoring, and Reporting

With mandatory compliance with state and local noise regulations, the proposed project would not result in any significant noise impacts; and therefore, no mitigation is required.

5.14.3.4 Impacts After Mitigation

No mitigation would be required; therefore, there will be no impacts after mitigation.

5.14.4 Conclusion

The proposed project would not result in any operational noise impacts or expose people to noise levels which exceed the City's adopted noise ordinance or are incompatible with Table NE-3 of the City of San Diego's General Plan. However, construction of the proposed project has the potential to result in temporary noise impacts to adjacent sensitive receptors. Nonetheless, the proposed project would be subject to the SDMC Sections 59.5.0404 and 59.5.0101 et seq., policies of the General Plan, and other applicable noise regulations. In addition, implementation of Mitigation Measures LU-1 and BR-1 would reduce potential impacts to sensitive biological resources to a less than significant level. Therefore, potential noise impacts of the proposed project would be less than significant.

In addition, as a condition of project approval, an interior noise analysis would be prepared and required to be approved by the City's Development Services Department prior to issuance of a building permit for the project. With the implementation of the findings of the interior noise analysis, interior noise levels in habitable rooms would be 45 dBA CNEL or below and comply with the California Code of Regulations, Title 24: Noise Insulation Standard City of San Diego General Plan Noise Compatibility Guidelines requirement. Therefore, the proposed project would not expose people to noise levels which exceed the City's adopted noise ordinance or are incompatible with Table NE-3 of the City of San Diego's General Plan, and impacts would be less than significant.