



THE CITY OF SAN DIEGO

DATE OF NOTICE: May 15, 2020

NOTICE OF AVAILABILITY FOR A DRAFT ENVIRONMENTAL IMPACT REPORT

DEVELOPMENT SERVICES DEPARTMENT

SAP No. 24007552

The City of San Diego Development Services Department, as Lead Agency, has prepared a draft Environmental Impact Report for the following project and is inviting your comments regarding the adequacy of the document. The draft Environmental Impact Report has been placed on the City of San Diego California Environmental Quality Act (CEQA) website at <https://www.sandiego.gov/ceqa/draft>.

Written comments on the environmental document must be received by June 29, 2020, to be included in the final document considered by the decision-making authorities. Comments can be submitted to either the following address, **E. Shearer-Nguyen, Environmental Planner, City of San Diego Development Services Center, 1222 1st Avenue, MS 501, San Diego, CA 92101**, or via e-mail to DSDEAS@sandiego.gov. Please ensure to include the project name and number in the subject line.

General Project Information:

- Project Name: **Riverwalk**
- Project No. 581984 / SCH No. 2018041028
- Community Plan Area: Mission Valley
- Council District: 7

Project Description: A request for the RESCISSION OF THE LEVI-CUSHMAN SPECIFIC PLAN, MISSION VALLEY COMMUNITY PLAN AMENDMENT, GENERAL PLAN AMENDMENT, LAND DEVELOPMENT CODE AMENDMENT to remove the Community Plan Implementation Overlay Zone (CPIOZ) from the site, ADOPTION of the RIVERWALK SPECIFIC PLAN, REZONE from OP-1-1 to CC-3-9 and CC-3-9 to OP-1-1, VESTING TENTATIVE MAP, various PUBLIC RIGHT-OF-WAY EASEMENT VACATIONS, PARK GENERAL DEVELOPMENT PLAN, FINANCING DISTRICT FORMATION, PUBLIC IMPROVEMENT AGREEMENTS, DEVELOPMENT AGREEMENT, SITE DEVELOPMENT PERMIT, and a CONDITIONAL USE PERMIT (CUP) to amend CUP No. 94-0563 to adopt the Riverwalk Specific Plan to establish goals, policies, development standards and architectural guidelines for a transit-oriented development (TOD) with a range of land uses, comprised of four districts. Land uses within the Specific Plan would include parks and open space, multi-family residential, commercial retail, and office and non-retail commercial. Buildout of Riverwalk Specific Plan would provide approximately 97 acres of parks, open space, and trails; 4,300 residential units; 152,000 square feet of commercial retail space; and 1,000,000 square feet of office and non-retail commercial use. The Riverwalk Specific Plan area is divided into four planning districts: North District, Central District, South District, and Park District. The approximate 195-acre 27-hole Riverwalk Golf Course is located at 1150 Fashion Valley Road. The General Plan designates the project site as Commercial Employment, Retail, and Services, in the northeastern and central portions of the site; Multiple Use, in the northern and southern portions of the site; Residential, in the western portion of the site; and Park, Open Space, and Recreation, in the central portion of the site. The Mission Valley Community Plan designates the project site as Residential (High Density) in the northeastern and northwestern portions of the site; Office and Visitor Commercial in the northcentral, northeastern, and southeastern portions of the site; and Potential Park/Open Space in the central portion of the site. The Levi-

Cushman Specific Plan identifies the project site for a mix of residential, retail, office, hotel, and recreational uses. Zoning on the site are CC-3-9 (Commercial—Community) in the central, northeastern, and southeastern portions of the site; RM-4-10 (Residential—Multiple Unit) in the northwestern and northeastern portions of the site; OP-1-1 (Open Space—Park) in the central portion of the site, and OC-1-1 (Open Space – Conservation) in the central portion of the site. Additionally, the site is located within a Community Plan Implementation Overlay Zone (CPIOZ-A), the Airport Land Use Compatibility Overlay Zone for Montgomery Field, the Airport Influence Area (AIA) for San Diego International Airport (SDIA) and Montgomery Field (Review Area 2), the Federal Aviation Administration Part 77 Notification Area for the SDIA and Montgomery Field, Transit Area Overlay Zone, and Transit Priority Area. (Parcel 1: APN: 437-240-03, 437-240-26, 437-240-27; Parcel 2: 437-240-28, 437-240-29; Parcel 3: 436-611-06, 436-611-29, 436-611-30, 436-650-14). ***The site is not included on any Government Code listing of hazardous waste sites.***

Applicant: SD Riverwalk LLC

Recommended Finding: The draft Environmental Impact Report analyzed the following environmental issue area(s) in detail: **Land Use, Transportation/Circulation, Visual Effects/Neighborhood Character, Biological Resources, Air Quality, Historical Resources, Energy, Noise, Greenhouse Gas Emissions, Tribal Cultural Resources, Geologic Conditions, Hydrology, Public Utilities, Water Quality, Public Services and Facilities, and Health and Safety.**

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

Additional Information: For environmental review information, contact E. Shearer-Nguyen at (619) 446-5369. **For information regarding public meetings/hearings on this project, contact the Project Manager, Jeffrey A. Peterson, at (619) 446-5237.** This notice was published in the SAN DIEGO DAILY TRANSCRIPT and distributed on May 15, 2020.

Gary Geiler
Deputy Director
Development Services Department



THE CITY OF SAN DIEGO

ENVIRONMENTAL IMPACT REPORT

Project No. 581984
SCH No. 2018041028

SUBJECT: Riverwalk: A request for the RESCISSION OF THE LEVI-CUSHMAN SPECIFIC PLAN, MISSION VALLEY COMMUNITY PLAN AMENDMENT, GENERAL PLAN AMENDMENT, LAND DEVELOPMENT CODE AMENDMENT to remove the Community Plan Implementation Overlay Zone (CPIOZ) from the site, ADOPTION of the RIVERWALK SPECIFIC PLAN, REZONE from OP-1-1 to CC-3-9 and CC-3-9 to OP-1-1, VESTING TENTATIVE MAP, various PUBLIC RIGHT-OF-WAY EASEMENT VACATIONS, PARK GENERAL DEVELOPMENT PLAN, FINANCING DISTRICT FORMATION, PUBLIC IMPROVEMENT AGREEMENTS, DEVELOPMENT AGREEMENT, SITE DEVELOPMENT PERMIT, and a CONDITIONAL USE PERMIT (CUP) to amend CUP No. 94-0563 to adopt the Riverwalk Specific Plan to establish goals, policies, development standards and architectural guidelines for a transit-oriented development (TOD) with a range of land uses, comprised of four districts. Land uses within the Specific Plan would include parks and open space, multi-family residential, commercial retail, and office and non-retail commercial. Buildout of Riverwalk Specific Plan would provide approximately 97 acres of parks, open space, and trails; 4,300 residential units; 152,000 square feet of commercial retail space; and 1,000,000 square feet of office and non-retail commercial use. The Riverwalk Specific Plan area is divided into four planning districts: North District, Central District, South District, and Park District. The approximate 195-acre 27-hole Riverwalk Golf Course is located at 1150 Fashion Valley Road. The General Plan designates the project site as Commercial Employment, Retail, and Services, in the northeastern and central portions of the site; Multiple Use, in the northern and southern portions of the site; Residential, in the western portion of the site; and Park, Open Space, and Recreation, in the central portion of the site. The Mission Valley Community Plan designates the project site as Residential (High Density) in the northeastern and northwestern portions of the site; Office and Visitor Commercial in the northcentral, northeastern, and southeastern portions of the site; and Potential Park/Open Space in the central portion of the site. The Levi-Cushman Specific Plan identifies the project site for a mix of residential, retail, office, hotel, and recreational uses. Zoning on the site are CC-3-9 (Commercial—Community) in the central, northeastern, and southeastern portions of the site; RM-4-10 (Residential—Multiple Unit) in the northwestern and northeastern portions of the site; OP-1-1 (Open Space—Park) in the central portion of the site, and OC-1-1 (Open Space – Conservation) in the central portion of the site. Additionally, the site is located within a Community Plan Implementation Overlay Zone (CPIOZ-A), the Airport Land Use Compatibility Overlay Zone for Montgomery Field, the Airport Influence Area (AIA) for San Diego International Airport (SDIA) and Montgomery Field (Review Area 2), the Federal Aviation Administration Part 77 Notification Area for

the SDIA and Montgomery Field, Transit Area Overlay Zone, and Transit Priority Area. (Parcel 1: APN: 437-240-03, 437-240-26, 437-240-27; Parcel 2: 437-240-28, 437-240-29; Parcel 3: 436-611-06, 436-611-29, 436-611-30, 436-650-14). Applicant: SD Riverwalk LLC.

ENVIRONMENTAL DETERMINATION:

This document has been prepared by the City of San Diego's Environmental Analysis Section under the direction of the Development Services Department and is based on the City's independent analysis and conclusions made pursuant to 21082.1 of the California Environmental Quality Act (CEQA) Statutes and Sections 128.0103(a), 128.0103(b) of the San Diego Land Development Code.

Based on the analysis conducted for the project described above, the City of San Diego, as the Lead Agency, has prepared the following Environmental Impact Report. The analysis addressed the following issue area(s) in detail: **Land Use, Transportation/Circulation, Visual Effects/Neighborhood Character, Biological Resources, Air Quality, Historical Resources, Energy, Noise, Greenhouse Gas Emissions, Tribal Cultural Resources, Geologic Conditions, Hydrology, Public Utilities, Water Quality, Public Services and Facilities, and Health and Safety.** The EIR concluded that the project would result in significant but mitigated environmental impacts to **Biological Resources, Historical Resources, Noise, and Tribal Cultural Resources**, and significant and unmitigated impacts to **Air Quality**. All other impacts analyzed in the Draft EIR were determined to be less than significant.

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

PUBLIC REVIEW DISTRIBUTION:

The following agencies, organizations, and individuals received a copy or notice of the draft Environmental Impact Report and were invited to comment on its accuracy and sufficiency.

Federal Government

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

State of California

Caltrans, District 11 (31)
California Department of Fish and Wildlife (32)
Regional Water Quality Control Board (44)
State Clearinghouse (46A)
California Transportation Commission (51)
California Department of Transportation (51A)
California Department of Transportation (51B)

State of California - continued

Native American Heritage Commission (56)
Kevin Schumacher, California Public Utilities Commission

City of San Diego

Mayor's Office (91)
Councilmember Bry, District 1 (MS 10A)
Councilmember Campbell, District 2 (MS 10A)
Councilmember Ward, District 3 (MS 10A)
Councilmember Montgomery, District 4 (MS 10A)
Councilmember Kersey, District 5 (MS 10A)
Councilmember Cate, District 6 (MS 10A)
Councilmember Sherman, District 7 (MS 10A)
Councilmember Moreno, District 8 (MS 10A)
Councilmember Gomez, District 9 (MS 10A)

Development Services Department

EAS

Transportation

LDR Planning

LDR Landscaping

LDR Geology

LDR Engineering

LDR Map Check

Plan-Historic

PUD Water and Wastewater Development

Development Project Manager

Planning Department

Long Range Planning

Park Planning

MSCP

Plan Facilities Planning

Environmental Services Department

Fire-Rescue Department

San Diego Police Department

Public Utilities Department

Transportation Development - DSD (78)

Development Coordination (78A)

Fire and Life Safety Services (79)

Parks and Recreation Board (83)

Historical Resources Board (87)

San Diego Housing Commission (88)

Parks and Recreation (89)

Tom Tomlinson, Facilities Financing (93B)

City Attorney (93C)

Wetlands Advisory Board (171)

Other Interested Organizations, Groups and Individuals

San Diego Association of Governments (108)
San Diego Regional Airport Authority (110)
Metropolitan Transit System (112)
San Diego Gas & Electric (114)
Metropolitan Transit System (115)
San Diego Unified School District (125)
San Diego Unified School District (132)
Rancho Santa Ana Botanic Garden at Claremont (161)
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Carmen Lucas (206)
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Save Our Heritage Organisation (214)
Ron Christman (215)
Clint Linton (215B)
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Kumeyaay Cultural Heritage Preservation (223)
Kumeyaay Cultural Repatriation Committee (225)
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Clint Linton, lipay of Santa Ysabel
Lisa Cumper, Jamul Indian Village
Jesse Pinto, Jamul Indian Village
Mission Valley Center Association (328)
Friars Village HOA (328A)
Mary Johnson (328B)
Mission Valley Community Council (328C)
Union Tribune News (329)
Friends of Mission Valley Preserve (330B)
Mission Valley Planning Group (331)
General Manager, Fashion Valley (332)
Gary Akin - San Diego Gas & Electric (381)
The San Diego River Coalition (334)

Other Interested Organizations, Groups and Individuals - continued

Linda Vista Planning Group (267)
Destiny Colocho, Rincon Band of Luiseno Indians
Ray Teran, Viejas Tribal Government
Robert Shandor
Willie Goodness
Lorna Leyton
Paul Leyton
Wayne Williams
Mary McMillar
Matthew Leyba-Gonzalez
Javier Alvarado
John Nugent
Michele Addington
Margie Roehn
Rick Manley
Paul Leyton
Jennifer Carroll
E. Albert
Park Estates HOA
Richard Drury, Lozeau Drury LLP
Komalpreet Toor, Lozeau Drury LLP
Stacey Osborne, Lozeau Drury LLP
John Stump
Kristen Byrne, Byrne Communications
Roman M. Maes
Christine August
Sharon Cooney, MTS
Robert Myers
Monica Desanti
Matthew Straborn
Lewis C. Carlisle Jr. Revoc Trust |
Boris Gresely, Carpenters/Contractors Cooperation Committee
Jeff Modrzejewski, SEED SD
Lynn Lyons, SD Riverwalk LLC, Applicant
Pete Shearer, SD Riverwalk LLC, Applicant
Ted Shaw, Atlantis Group Land Use Consultants, Agent
Karen Ruggles, KLR Planning, Consultant
Brittany Ruggles, KLR Planning, Consultant

RESULTS OF PUBLIC REVIEW:

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

- () Comments addressing the accuracy or completeness of the draft environmental document were received during the public input period. The letters and responses are incorporated herein.



Anna McPherson
Program Manager
Development Services Department

Analyst: Shearer-Nguyen

May 15, 2020

Date of Draft Report

Date of Final Report

RIVERWALK

Draft Environmental Impact Report

SCH No. 2018041028

Project No. 581984

May 2020

Prepared for:

City of San Diego
Development Services Department
Land Development Review
1222 First Avenue, MS 501
San Diego, CA 92101-4155

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- Appendix C – CAP Conformance Evaluation and CAP Checklist
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- Appendix F – Air Quality Study
- Appendix G – Cultural Resources Inventory Report
- Appendix H – Addendum to the Class III Cultural Resource Inventory
- Appendix I – Historical Resources Technical Report
- Appendix J – Letters/Responses to Service Providers
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LIST OF ACRONYMS AND ABBREVIATIONS

AB	Assembly Bill
ACHP	Advisory Council on Historic Preservation
AD	Anno Domini
ADD	Assistant Deputy Director
ADMDs	Area Specific Management Directives
ADT	Average Daily Traffic
AEOZ	Airport Environs Overlay Zone
Af	artificial fills
AFG	Accelerated Forecasted Growth
AFY	acre-feet per year
AGR	Agricultural Supply
AIA	Airport Influence Area
ALUC	Airport Land Use Commission
ALUC Plan/ALCUP	Airport Land Use Compatibility Plan
AM/a.m.	morning
AMSL	above mean sea level
APCD	Air Pollution Control District
APE	area of potential effect
AQMP	Air Quality Management Plan
ARDAP	Archaeological Research and Data Recovery Program
ASCE	American Society of Civil Engineers
AST	above ground storage tank
ASTM	American Society for Testing and Materials
ATS	advanced treatment system
BAT	Best Available Technology Economically Achievable
B.C.	Before Christ
BCME	Biological Construction Mitigation/Monitoring Exhibit
BCT	Best Conventional Pollutant Control Technology
BFEs	base flood elevations
Bgs	below ground surface
BI	Building Inspector
BIOL	Preservation of Biological Habitats of Special Significance
BMP(s)	Best Management Practice(s)
BRT	Bus Rapid Transit
BSO	Biologically Superior Option
BTR	Biological Technical Report
CAAA	Federal Clean Air Act Amendments
CAAQS	California Ambient Air Quality Standards
CAC	California Administrative Code
CalARP	California Accidental Release Prevention Program
CalEPA	California EPA

LIST OF ACRONYMS AND ABBREVIATIONS

CAL FIRE	California Department of Forestry and Fire Protection
CALNAGPRA	California Native American Graves Protection and Repatriation Act of 2001
Caltrans	California Department of Transportation
CAP	Climate Action Plan
CAP	collective action plan
CARB	California Air Resources Board
CASQA	California Stormwater Quality Association
CBC	California Building Code
CC	Commercial-Community
CCAA	California Clean Air Act
CCR	California Code of Regulations
CD	Construction Documents
CDE	California Department of Education
CDFG	California Department of Fish and Game
CDFW	California Department of Fish and Wildlife
CE	Conservation Element
CEC	California Energy Commission
CEQA	California Environmental Quality Act
CERCLA	Comprehensive Environmental Response, Compensation, and Liability Act
CESA	California Endangered Species Act
CFC	California Fire Code
CFGC	California Fish and Game Code
CFR	Code of Federal Regulations
CFS/cfs	cubic feet per second
CH ₄	methane
CHHSLS	California Human Health Screening Levels
CHP	California Highway Patrol
CHRIS	California Historical Resources Information System
CHSC	California Health and Safety Code
CLOMR	Conditional Letter of Map Revision
CM	Construction Manager
CNEL	community noise equivalent level
CNPS	California Native Plant Society
CO	carbon monoxide
CO ₂	carbon dioxide
CO ₂ e	CO ₂ equivalent
COCs	contaminants of Concern
CPA	Community Plan Amendment
CPIOZ	Community Plan Implementation Overlay Zones
CPTED	Crime Prevention Through Environmental Design
CPU	Community Plan Update
CPUC	California Public Utilities Commission
CRA	Colorado River Aqueduct
CRC	California Residential Code

LIST OF ACRONYMS AND ABBREVIATIONS

CRHR	California Register of Historic Resources
CSMP	Construction Site Monitoring Program
CSVR	Consultant Site Visit Record Forms
CUP	Conditional Use Permit
CUPAs	Certified United Program Agencies
CWA	Clean Water Act
cy	cubic yards
dB	decibel
dB(A)	A-weighted decibel
DDT	dichlorodiphenyltrichloroethane
DEH	County Department of Environmental Health
°	degrees, as in degrees Fahrenheit
DHS	San Diego Department of health Services
DIF	Development Impact Fee
DPM	Diesel Particulate Matter
DSD	City of San Diego Development Services Department
DTSC	Department of Toxic Substances
du/ac	dwelling units/acre
DWR	State Department of Water Resources
ED	Environmental Designee
EDR	Environmental Data Resources
EDU	equivalent dwelling unit
EIR	Environmental Impact Report
EISA	Energy independence Security Act of 2007
EMS	Emergency Medical Service
EMTs	Emergency Medical Technicians
EOC	City Emergency Operations Center
EOP	Emergency Operations Plan
EPA	Environmental Protection Agency
EPP	Essential Public Projects Option
ESA	Federal Endangered Species Act
ESA	Environmental Site Assessment
ESD	Environmental Services Department
ESL	Environmentally Sensitive Lands
et seq.	and the following
EVP	Economic Viability Option
°F	Fahrenheit
FAA	Federal Aviation Administration
FEMA	Federal Emergency Management Agency
FIRM	Flood Insurance Rate Map
ft.	feet
FTA	Federal Transit Administration
FY	fiscal year

LIST OF ACRONYMS AND ABBREVIATIONS

GC	Grading Contractor
GCC	global climate change
GDP	General Development Plan
GHG	greenhouse gas
GIS	Geographic Information System
g/l	gram per liter
GPD	gallons per day
GWP	global warming potential
HAZNET	Hazardous Waste information System
HCP	Habitat Conservation Plan
HE	Housing Element
HFCs	hydrofluorocarbons
HFE	hydrofluorinated ethers
HMBEPs	Hazardous Materials Business Emergency Plan
HMBP	Hazardous Materials Business Plan
HMD	Hazardous Materials Division
Hr/hr	hour
H.R.	House Resolution
HRC	Historical Resources Council
HRG	Historical Resources Guidelines
HUD	Federal Department of Housing and Urban Development
HVAC	heating, ventilation, and air conditioning
I-	Interstate, as in I-15
IBC	International Building Code
IND	Industrial Service Supply
IOD	Irrevocable Offers of Dedication
IPCC	United National Intergovernmental Panel on Climate Change
ISO	California Independent System Operator
ISTEA	International Surface Transportation Efficiency Acts
ITPs	incidental take permits
ITS	Intelligent Transportation System
IWMA	Integrated Waste Management Act
IWMP	Integrated Waste Management Plan
IWP	Industrial Wastewater Program
KBTU	British Thermal Units
kg	kilogram
kV	kilovolt
kWh	kilowatt hour
LA	Landscape Architect
LAS	Landscape Architect Section
lb/lbs	pound/pounds
LCD	Landscape Construction Documents

LIST OF ACRONYMS AND ABBREVIATIONS

LCFS	Low Carbon Fuel Standard
LDC	City of San Diego Land Development Code
LDM	Land Development Manual
L _{DN}	24-hour day-night equivalent level
LDR	Land Development Review
LEA	Local Enforcement Agency
Leq	equivalent continuous sound level
LID	Low Impact Development
LLG	Linscott, Law, and Greenspan Engineers
L _{max}	maximum noise level
L _{min}	minimum noise level
LOMR	Letter of Map Revision
LOS	level of service
LRT	Light Rail Transit
LTRP	long-term energy resource plan
LUAGs	Land Use Adjacency Guidelines
LUST	Leaking Underground Storage Tank
MA	Mobility Assessment
MBTA	Migratory Bird Treaty Act
MEP	maximum extent practicable
mgd	million gallons per day
MHMP	San Diego County Multi-Jurisdictional Hazard Mitigation Plan
MHPA	Multi Habitat Planning Area
Min/min	minute
MLD	most likely descendent
MMC	Mitigation Monitoring Coordination
MMRP	Mitigation Monitoring and Reporting Program
MMT	million metric tons
mph	miles per hour
MSCP	Multiple Species Conservation Program
MT	metric tons
MRGA	Master Geographical Reference Area
MTS	Metropolitan Transit System
MUN	municipal domestic supply
MW	megawatt
MWD	Metropolitan Water District of Southern California
MV	Mission Valley
NAAQS	National Ambient Air Quality Standards
NAHC	Native American Heritage Commission
NCCP	Natural Conservation Community Plan
NDP	Neighborhood Development Permit
NF ₃	nitrogen trifluoride
NHL	National Historic Landmarks
NHPA	National Historic Preservation Act

LIST OF ACRONYMS AND ABBREVIATIONS

NHTSA	Department of Transportation National Highway Safety Administration
NIMS	National Industry Management System
NO	nitric oxide
NOC	Notice of Completion
NOP	Notice of Preparation
NO _x	oxides of nitrogen
NO ₂	nitrogen dioxide
N ₂ O	nitrous oxide
NPDES	National Pollution Discharge Elimination System
NRHP	National Register of Historic Places
NTP	Notice to Proceed
OA	San Diego County Operational Area
OC	Open Space Conservation
OEHHA	Office of Environmental Health Hazard Assessment
OES	San Diego Office of Emergency Services
OF	Open Space - Floodplain
OP	Open Space-Park
OPR	(The Governor's) Office of Planning and Research
OSHA	(Federal) Occupational Safety and Health Administration
PCBs	polychlorinated biphenyls
PDP	Planned Development Permit
PFC	perfluorocarbon
PF-E	Public Facilities, Services, and Safety Element
PI	principal investigator
PM/p.m.	afternoon
PM _{2.5}	particulate matter less than 2.5 microns in diameter
PM ₁₀	particulate matter of 10 microns in diameter or smaller
POC	points of connection
ppm	parts per million
PPV	peak particle velocity
PQB	Principal Qualifies Biologist
PRC	Public Resources Code
PROC	Industrial Process Supply
PRS	principal restoration specialist
PSR	Project Study Reports
PTS	project tracking system
PUD	Public Utilities Department
Qalo	Older Alluvium
QBM	Qualified Biological Monitor
QTR	River Terrace Deposits
Qya	Alluvium

LIST OF ACRONYMS AND ABBREVIATIONS

RAQS	Regional Air Quality Strategy
RARE	Preservation of Rare Endangered Species
RCP	Regional Comprehensive Plan
RCRA	Resource Conservation and Recovery Act
RE	Resident Engineer
REAP	Rain Event Action Plan
REC-1	Contact Water Recreation
REC-2	Non-contact Water Recreation
RECs	recognized environmental conditions/concerns
RES	Regional Energy Strategy
RFS	renewable fuels
RHNA	Regional Housing Needs Assessment
RIC	Revegetation Installation Contractor
RM	Residential-Multiple Unit
RMC	Revegetation Maintenance Contractor
RMP	Risk Management Plan
RMS	root-mean-square
ROG	Reactive Organic Gas
RP	Regional Plan
RRME	revegetation/restoration monitoring exhibit
RWQCB	Regional Water Quality Control Board
SAM	Site Assessment and Mitigation
SANDAG	San Diego Association of Governments
SARA	Superfund Amendments and Revitalization Act
SB	Senate Bill
SB/sb	southbound
SCAQMD	South Coast Air Quality Management District
SCIC	South Coastal Information Center
SCS	Sustainable Communities Strategy
SDAB	San Diego Air Basin
SDAPCD	San Diego Air Pollution Control District
SDBD	San Diego Building Department
SDCGHGI	San Diego County Greenhouse Gas inventory
SDCRAA	San Diego County Regional Airport Authority
SDCWA	San Diego County Water Authority
SDFD	San Diego Fire-Rescue Department
SDG&E	San Diego Gas and Electric
SDHC	San Diego Housing Commission
SDIA	San Diego International Airport
SDMC	San Diego Municipal Code
SD-OHS	San Diego Office of Homeland Security
SDP	Site Development Permit
SDPD	San Diego Police Department
SDPL	San Diego Public Library
SDRMP	San Diego River Park Master Plan

LIST OF ACRONYMS AND ABBREVIATIONS

SDUSD	San Diego Unified School District
sec.	second(s)
SF ₆	sulfur hexafluoride
SFHA	Special Flood Hazard Area
SFP	school facilities program
SHPO	State Historic Preservation Officer
SIP	State Implementation Plan
SLF	Sacred Lands File
SMAQMD	Sacramento Metropolitan Air Quality Management District
SO ₂	sulfur dioxide
SOI	Secretary of the Interior
SR	State Route, as in SR-163
SRREs	Source Reduction and Recycling Elements
SRQs	small retail quantities
STC	sound transmission class
SWIS	Solid Waste information System
SWP	State Water Project
SWPPP	Storm Water Pollution Prevention Plan
SWQMP	Storm Water Quality Management Plan
SWRCB	State Water Resources Control Board
SYSTEM-1	first sewer system
SYSTEM-2	second sewer system
SYSTEM-3	third sewer system
SYSTEM-4	fourth sewer system
TAC(s)	Toxic Air Contaminant(s)
TCR	Tribal Cultural Resources
TDM	Transportation Demand Management
TIA	Transportation Impact Analysis
TIP	Transportation Improvement Plan
TOD	Transit Oriented Development
TOG	total organic gas
TPA	Transit Priority Area
UBC	Uniform Building Code
UCSD	University of California San Diego
U.S./US	United States
USA	Urban Systems Associates, Inc.
USACOE	U.S. Army Corps of Engineers
USD	University of San Diego
USDA	U.S. Department of Agriculture
USFWS	U.S. Fish and Wildlife Service
UST	underground storage tank
UTC	University Town Center
UWMP	Urban Water Management Plan

LIST OF ACRONYMS AND ABBREVIATIONS

Vdb	vibration decibels
VHIHSZ	Very High Fire Hazard Severity Zone
VMT	vehicle miles traveled
VOC	Volatile Organic Compounds
VTM	Vesting Tentative Map
WARM	Warm Freshwater Habitat
WILD	Wildlife Habitat
WLAs	waste load allocations
WMP	Waste Management Plan
WQBELS	water quality based effluent limitations
WSA	Water Supply Assessment
ybp	years before present

ES EXECUTIVE SUMMARY

This Environmental Impact Report (EIR) has been prepared for the Riverwalk project (project), a private development project located in the Mission Valley Community Plan area. This document analyzes the potential environmental effects associated with implementation of the project (including direct and indirect impacts, secondary impacts, and cumulative effects). Prepared under the direction of the City of San Diego's Environmental Analysis Section, this EIR reflects the independent judgment of the City of San Diego.

ES.1 Purpose and Scope of the EIR

This EIR has been prepared in accordance with, and complies with, all criteria, standards, and procedures of the California Environmental Quality Act (CEQA) of 1970 as amended (PRC 21000 et seq.), State CEQA Guidelines (CAC 15000 et seq.), and City of San Diego's EIR Preparation Guidelines. Per Section 21067 of CEQA and Sections 15367 and 15050 through 15053 of the State CEQA Guidelines, the City of San Diego is the *Lead Agency* under whose authority this document has been prepared. As an informational document, this EIR is intended for use by the City of San Diego decision-makers and members of the general public in evaluating the potential environmental effects of the Riverwalk project.

This EIR provides decision-makers, public agencies, and the public in general with detailed information about the potential significant adverse environmental impacts of the Riverwalk project. By recognizing the environmental impacts of the project, decision-makers will have a better understanding of the physical and environmental changes that would accompany the project should it be approved. The EIR includes recommended mitigation measures which, when implemented, would provide the Lead Agency with ways to substantially lessen or avoid significant effects of the project on the environment, whenever feasible. Alternatives to the project are presented to evaluate alternative development scenarios that can further reduce or avoid significant impacts associated with the project.

As described in Section 15152 of the State CEQA Guidelines, tiering refers to *"using the analysis of general matters in a broader EIR (such as one prepared for a general plan or policy statement) with later EIRs and negative declarations on narrower projects; incorporating by reference the general discussions from the broader EIR; and concentrating the later EIR or negative declaration solely on the issues specific to the later project."* This tiered approach allows incorporation by reference the information, analysis, and mitigation measures from the "first tier" document that are relevant to a specific project. The project site is located in the Mission Valley Community Plan area. The Mission Valley Community Plan Update (CPU) Program EIR provided a program-level environmental analysis that covers the project site. This EIR incorporates and relies upon relevant analysis from the Mission Valley CPU EIR related to the evaluation of cumulative impacts and expands upon and refines such information where warranted. The Mission Valley CPU Program EIR is available for review on the City of San Diego website.

It is intended that this EIR, once certified, serve as the primary environmental document for those actions associated with the project. According to Section 15162 of the CEQA Guidelines, *when an EIR has been certified for a project, no subsequent EIR shall be prepared for that project unless the Lead Agency determines, on the basis of substantial evidence in light of the whole record, one or more of the following:*

- (1) Substantial changes are proposed in the project which will require major revisions of the previous EIR due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effect;*
- (2) Substantial changes occur with respect to the circumstances under which the project is undertaken which will require major revisions of the previous EIR due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects; or*
- (3) New information of substantial importance, which was not known and could not have been known with the exercise of reasonable diligence at the time the previous EIR was certified as complete, shows any of the following:*
 - (A) The project will have one or more significant effects not discussed in the previous EIR;*
 - (B) Significant effects previously examined will be substantially more severe than shown in the previous EIR;*
 - (C) Mitigation measures or alternatives previously found not to be feasible would in fact be feasible, and would substantially reduce one or more significant effects of the project, but the project proponents decline to adopt the mitigation measure or alternative; or*
 - (D) Mitigation measures or alternative which are considerably different from those analyzed in the previous EIR would substantially reduce one or more significant effects on the environment, but the project proponents decline to adopt the mitigation measure or alternative.*

In accordance with CEQA Guidelines Section 15082(a), an Notice of Preparation (NOP), dated April 6, 2018, was prepared for the project and distributed to all Responsible and Trustee Agencies, as well as other agencies and members of the public who may have an interest in the project. The purpose of the NOP was to solicit comments on the scope and analysis to be included in the EIR for the Riverwalk project. A copy of the NOP and letters received during its review are included in Appendix A to this EIR. In addition, comments were also gathered at a public scoping session held for the project on April 24, 2018, at the Mission Valley Branch Library. A transcript of the public scoping meeting is included in Appendix B.

Based on an initial review of the project and comments received, the City of San Diego determined that the EIR for the project should address the following environmental issues:

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

Based on the analysis contained in Chapter 5.0, *Environmental Analysis*, of this EIR, the project could result in significant impacts to Biological Resources, Air Quality, Historical Resources, Noise, and Tribal Cultural Resources. Mitigation has been provided for all potentially significant impacts to reduce impacts to below a level of significance with the exception of cumulative impacts associated with Air Quality.

ES.2 Project Location and Setting

The regional and local settings of the project are discussed in Chapter 2.0, *Environmental Setting*, of this EIR. As shown in Figure 2-3, *Project Location Map*, the Riverwalk project site is situated north of Hotel Circle North, south of Friars Road, and west of Fashion Valley Road. Interstate 8 (I-8) is located directly south of the project site, beyond Hotel Circle North; State Route 163 (SR 163) is located approximately one mile to east of the project site; I-5 is located approximately two miles west of the project site. The project site is situated between existing residential, commercial retail, and commercial office development to the north; residential development and vacant land to the west; commercial retail and mixed-use hospitality development to the east; and a mix of commercial office and hospitality uses to the south. Riverwalk Golf Course operates three, nine-holes golf courses on the project site under Conditional Use Permit (CUP) 94-0563. The site is designated for Residential (High Density), Office and Visitor Commercial, and Potential Park/Open Space in the Mission Valley Community Plan. The existing zones are RM-4-10, CC-3-9, OC-1-1, and OP-1-1. In addition to the base zones, a Community Plan Implementation Overlay Zone (CPIOZ) is applied within the boundaries of the Levi-Cushman Specific Plan are to provide supplemental development regulations that are tailored to implement the vision and policies of the Mission Valley Community Plan. Two of the subdistricts of the CPIOZ apply to the project site; the Specific Plan Subdistrict and the San Diego River Subdistrict.

ES.3 Project Baseline

CEQA Guidelines Section 15125(a) guides the discussion of the environmental setting for the proposed project and advises in the establishment of the project baseline. According to CEQA, *[a]n EIR must include a description of the physical environmental conditions in the vicinity of the project. This*

environmental setting will normally constitute the baseline physical conditions by which a lead agency determines whether an impact is significant. The Specific Plan area is developed with the Riverwalk Golf Course, comprised of three nine-hole golf courses, driving range, clubhouse building, maintenance facilities, surface parking, access roadways, and golf cart paths/bridges. The San Diego River runs in an east-west manner through roughly the center of the project site. The baseline condition for the Riverwalk project is the developed site (i.e., the Riverwalk Golf Course).

ES.4 Project Description

The project objectives associated with the Riverwalk Specific Plan and related actions are:

- Create a focused long-range plan intended to promote increased residential density and employment opportunities consistent with the General Plan, Mission Valley Community Plan, San Diego River Park Master Plan, and the Climate Action Plan.
- Assist the City's housing supply needs by providing a range of housing, including both market rate and deed-restricted affordable units, proximate to transit, jobs, amenities, and services.
- Implement the City of Villages goals and smart growth principles by creating a mixed-use neighborhood with housing, commercial, employment, and recreation opportunities along transit while restoring a stretch of the San Diego River.
- Create a transit-accessible mixed-use development in a central, in-fill location.
- Promote multi-modal travel (pedestrian and bicycle friendly corridors) through the project site through on-site trails, paths, and sidewalks that connect to internal and adjacent amenities and services throughout Mission Valley.
- Construct a new Green Line Trolley stop easily accessible from within Riverwalk and to adjacent surrounding residential and employment areas.
- Design a neighborhood that integrates the San Diego River through active and passive park uses, trails, resource-based and a connected open space.
- Allow for the establishment and creation of a habitat Mitigation Bank that provides long-term habitat conservation and maintenance.
- Improve the Fashion Valley Road crossing that:
 - Provides expanded storm water flow volume accommodating a 10- to 15-year storm even;
 - Improves emergency response times by facilitating north-south vehicular access in storm events; and
 - Expands active transportation circulation by providing sidewalks and a buffered two-way cycle track.
 - Modernizes flood control gate operations in the project vicinity.
- Celebrate and interpret important cultural and historic resources within the Specific Plan area.

The Riverwalk Specific Plan purpose is to create a long-range plan that would create a mixed-use, transit-oriented neighborhood. The Riverwalk Specific Plan allows for development of 4,300 multi-family residential dwelling units; 152,000 square feet of commercial retail space; 1,000,000 square feet of office and non-retail commercial; approximately 97 acres of park, open space, and trails; adaptive reuse of the existing golf clubhouse into a community amenity; and a new Green Line Trolley stop. Improvements to surrounding public infrastructure and roadways would be implemented as part of the Riverwalk project, including improvements to the Fashion Valley Road crossing of the San Diego River as a 10- to 15-year storm event crossing. The project would also include a habitat restoration effort on-site to create and/or enhance 25.16 acres of native habitats along the San Diego River, within and adjacent to the MHPA, and setting aside area for establishing a future wetland habitat mitigation bank.

ES.5 Summary of Environmental Impacts and Mitigation

Chapter 5.0 of this EIR presents the *Environmental Analysis* of the project. Based on the analysis contained in Chapter 5.0 of this EIR, the Riverwalk project would result in significant impacts associated with the following issue areas: Biological Resources, Air Quality, Historical Resources, Noise, and Tribal Cultural Resources. Mitigation has been provided for all potentially significant impacts to reduce impacts to below a level of significance with the exception of cumulative impacts associated with Air Quality.

Table ES-1, *Summary of Environmental Impacts and Mitigation Measures*, summarizes the potential environmental impacts of the Riverwalk project by issue area, as analyzed in Chapter 5.0, *Environmental Analysis*, of this EIR. The table also provides a summary of the mitigation measures proposed to avoid or reduce significant adverse impacts. The significance of environmental impacts after implementation of the recommended mitigation measures is provided in the last column of Table ES-1. Responsibilities for monitoring compliance with each mitigation measure are provided in Chapter 11.0, *Mitigation Monitoring and Reporting Program*, of the EIR.

ES.6 Potential Areas of Controversy

Pursuant to CEQA Guidelines Section 15123(b)(2), an EIR shall identify *areas of controversy known to the Lead Agency, including issues raised by the agencies and the public, and issues to be resolved, including the choice among alternatives and whether and how to mitigate for significant effects*. The NOP for the EIR was distributed on April 6, 2018, for a 30-day public review and comment period. Issues of controversy raised in response to the NOP prepared and circulated for the Draft EIR focus on biological resources, tribal cultural resources, hydrology/drainage, land use and transportation/circulation. These concerns have been identified as areas of known controversy and are analyzed in Chapter 5.0, *Environmental Analysis*, of this EIR.

ES.6.1 Issues to be Resolved by the Decision-Making Body

The City Council must review the project and this EIR and determine if the project or one of the alternatives presented in Chapter 10.0, *Alternatives*, should be approved and implemented. If the project is selected for approval, the City Council will be required to certify the Final EIR, determine whether and how to mitigate significant impacts, and adopt associated Findings pursuant to CEQA Guidelines Section 15091 for the following significant impacts identified in the EIR:

- Biological Resources
- Air Quality
- Historical Resources
- Noise
- Tribal Cultural Resources

Furthermore, a Statement of Overriding Considerations pursuant to CEQA Guidelines Section 15093 would be required for air quality significant and unmitigated impacts.

ES.7 Summary of Project Alternatives

Alternatives are presented in Chapter 10.0 of this EIR. The alternatives identified in this EIR are intended to further reduce or avoid significant environmental impacts associated with the project.

ES.7.1 Alternatives Considered But Rejected

The *Alternatives* section (Chapter 10.0) of this EIR includes a discussion of alternatives which were considered early in the project design process but which have been rejected. This section includes an Alternative Locations alternative, Wetlands Avoidance alternative, and No Project/Development Under Existing Plan (Levi-Cushman Specific Plan) alternative. These *Alternatives Considered but Rejected* are briefly summarized below.

ES.7.1.1 Alternative Locations

The project proposes an integrated mixed-use project on approximately 195 acres within the Mission Valley community. The project requires a large land mass to aggregate the types and intensities of development to create the viable mix of uses that would form a successful neighborhood and community center. Additionally, such a site must be accessible by public transit. There is only one other area within Mission Valley of sufficient size that could develop in a manner similar to that proposed by the Riverwalk project: the SDCCU (formerly Qualcomm) Stadium site, located in the eastern portion of the community. The SDCCU Stadium site is currently being planned for redevelopment by San Diego State University as a new stadium and mixed-use project. The

SDCCU Stadium site is not owned by the project applicant and is not available to the applicant for the project.

While there may be areas in other portions of the City that remain undeveloped and of appropriate size to develop the project, these site could be constrained to a greater degree by environmental resources, do not share the same qualities as the project site with respect to transit and accessibility, or would result in similar or greater environmental effects. The project is proposed for a developed golf course site which is centrally located within the City and the Mission Valley community and is under one ownership. The site has easy access to public streets and freeways and would be served by existing transit, as well as a new trolley stop provided by the project. Large landholdings that could accommodate the project could be further removed from existing infrastructure and lack access to transit. Traffic impacts from alternative sites could result in greater VMT than the project.

The project would result in significant unmitigated operational impacts relative to air quality. Operational impacts are primarily related to traffic and area source (i.e. consumer products, architectural coating and landscape equipment). Relocating the project to another site within the City would result in the same or greater air quality impacts, as the size and scope of the project would remain the same, possibly requiring more and longer trips due to lack of proximity to transit and a mix of existing uses.

The project would result in impacts to sensitive biological resources that would be fully mitigated. Other sites could have greater amount of sensitive biological resources than those at project site (potentially unmitigable), limiting development potential and resulting in greater impacts. Thus, locating the project on an alternative site in the City would not avoid or substantially lessen the project's impacts and could result in greater environmental effects. Furthermore, the project applicant does not own any other properties within the City of a size to accommodate the project. For these reasons, there are no other feasible alternative locations for the project as proposed. Finally, the existing site is being proposed for land uses that are consistent with the Community Plan's identified land use and zoning; there are no land use conflicts that would be avoided by analyzing an alternative site. For these reasons, no alternative site location was analyzed in detail within the EIR.

ES.7.1.2 Wetlands Avoidance Alternative

The Mobility Element of the Mission Valley Community Plan identifies Fashion Valley Road to be widened from its existing functional classification of a 4-Lane Collector without Two-Way Left-Turn Lane to its ultimate classification of a 4-Lane Major Arterial with a raised median and a two-way Class IV Cycle Track along the west side of the roadway. The project includes improvements to widen a portion of Fashion Valley Road along the project frontage to its ultimate classification per the Community Plan.

As evaluated in Section 5.4, *Biological Resources*, implementation of the project would result in a direct impact to 0.64 acre of wetland/riparian vegetation communities (southern cottonwood-willow riparian forest, and coastal and valley freshwater marsh), due to the construction of improvements to Fashion Valley Road. The project would also result in an indirect impact to sensitive bird species during project construction, due to increased noise levels. A Wetlands Avoidance alternative was considered that would develop the project without improvements to Fashion Valley road, thereby avoiding direct impacts to wetland/riparian vegetation. However, indirect impacts to biological resources would still occur, as construction activities associated with site development would have the potential to increase noise levels proximate to sensitive biological resources.

The Wetlands Avoidance alternative would reduce impacts to historical resources, as less grading would occur in areas where archaeological resources are known to occur, and monitoring would be required in other areas of the project site, as is the case with the project. Other than avoiding significant direct impacts to biological resources, and reducing impacts to historical resources, the Wetlands Avoidance alternative would not avoid or reduce any other projects impact and may result in increasing effects associated with flooding. The expanded storm water flow volume to accommodate a 10- to 15-year storm event, would not be provided under this alternative. Seasonal flooding of the San Diego River would occur as it does periodically today, and there would be increased north-south vehicular access in storm events that is associated with the improvements to Fashion Valley Road.

This alternative would not meet some of the project's fundamental objectives. Specifically, this alternative would not improve the Fashion Valley Road crossing of the San Diego River, expanding storm water flow volume to accommodate a 10- to 15-year storm event; would not increase north-south access during storm events; and would not expand active transportation circulation by providing sidewalks and a buffered two-way cycle track.

The project's proposed improvements would enhance circulation for the community, allow for vehicular crossing during 10- to 15-year flood events thereby providing for improved north-south circulation, and minimize impacts to biological resources to the extent possible. There is no feasible alternative that could avoid impacts to wetlands and still provide roadway improvements as identified in the Mission Valley Community Plan. Therefore, this alternative has been rejected from further consideration.

ES.7.1.3 No Project/Development Under Existing Plan (Levi-Cushman Specific Plan)

When the project is the revision of an existing land use or regulatory plan, policy, or on-going operation, CEQA Guidelines Section 15126.6(e) requires addressing a "no project" alternative that would be the continuation of the existing plan, policy, or operation into the future. In the case of the Riverwalk project, the existing Levi-Cushman Specific Plan is in effect on the project site. In accordance with

CEQA Guidelines Section 15126.6(e), the No Project/Development Under Existing Plan alternative evaluates an alternative where development of the site would occur under the existing Levi-Cushman Specific Plan.

Pursuant to the Levi-Cushman Specific Plan, development under this alternative would result in total development intensity of 5.3 million square feet, comprised of 1,329 residential units; 1,000 hotel rooms; 200,000 square feet of commercial retail space; 2,582,000 square feet of office; approximately 40 acres of river open space (the river channel), 11 acres of recreational open space, and 25 acres of landscaped or project open space; and a total of 66,955 ADT. In order for the Levi-Cushman Specific Plan to proceed, it would require subsequent entitlement permits and rescinding or amending CUP No. 94-0563, which is in effect for the existing Riverwalk Golf Course.

Under this alternative, the San Diego River would be channelized through the project site. The channelization would be 400 to 500 feet in width and approximately 26 feet in depth, constructed to carry the 100-year flood projected by the USACOE. The channelization would reduce the floodway from approximately 106 acres to 40 acres, allowing for a larger development area within the area reclaimed by channelization. A 25-foot-wide buffer would be provided on either side of the river that would contain a planted barrier to prevent direct access to the river and habitat areas and may contain pedestrian and bike paths, landscaped areas, and passive recreation areas. The edges and banks of the river channel would be riparian woodland, wetland marsh, and other habitat areas. Three habitat islands would be included to increase the total area of wetland vegetation.

A key element of the Levi-Cushman Specific Plan is the creation of a 12-acre island located along the southern edge of the San Diego River to accommodate small-scale specialty retail, office, and residential uses and a dramatic tower theme feature (with reference to a tower element such as the Seattle Space Needle). The island would have a 40-foot canal on the south side to create a waterside environment of retail, office, and pedestrian uses. The canal would provide for a manufactured lake, separate from the San Diego River, that would accommodate paddleboats or similar water-oriented rides. A bridge of up to 50 feet in width would span from the north shore of the island for pedestrian use, commercial kiosks, and transit shuttles that would provide 100-year crossing, as well as emergency access.

Relative to roadways and transit, Fashion Valley Road would be upgraded to a 10-year flood level crossing under this alternative, as planned in the Levi-Cushman Specific Plan. Where Fashion Valley Road crosses the river, it would be inundated at the time of a 100-year storm and cause a slight backwater upstream. This alternative would include a connection between Friars Road and Hotel Circle North (Levi-Cushman Specific Plan Street 'A', roughly in the location of the IOD for future public Street 'J'). Designed as a 100-year flood level crossing, this road would incorporate a weir structure to assure a perennial body of water within the project area. A trolley stop and transportation center would be provided within the center median of Levi-Cushman Specific Plan's road "Camino de la Reina" (roughly the location of Riverwalk Drive).

ES.7.2 Alternatives Considered

Alternatives considered for the Riverwalk project, including a discussion of the “No Project” alternative, are addressed in detail in Chapter 10.0, *Alternatives*. Relative to the requirement to address a “No Project” alternative, CEQA Guidelines Section 15126.6(e) states that:

- (A) When the project is the revision of an existing land use or regulatory plan, policy or ongoing operation, the “no project” alternative will be the continuation of the existing plan, policy or operation into the future.*
- (B) If the project is other than a land use or regulatory plan, for example a development project on identifiable property, the “no project” alternative is the circumstance under which the project does not proceed.*

Alternatives to the Riverwalk project discussed in this EIR include the “No Project” alternative that is mandated by CEQA with regards to CEQA Guidelines Section 15126.6(e)(A), and other alternatives that were developed during project planning and environmental review for the project. Specifically, the following project alternatives are addressed in this EIR:

- Alternative 1 – No Project/No Build
- Alternative 2 – No Project/Development Under Existing Plan
- Alternative 3 - Reduced Development Intensity/Operational Air Quality Impact Avoidance
- Alternative 4 - Reduced Development Intensity/Operational Air Quality Impact Avoidance and Minimized Historical/Tribal Cultural Resources Impacts

ES.7.2.2 Alternative 1 - No Project/No Build

Under the No Project/No Build alternative, the project would not be implemented on the site. None of the improvements resulting from the project would occur: a mixed-use development would not be established; no additional housing or employment uses would be created; Fashion Valley Road would not be improved; a new transit stop would not be provided; and a new expansive Riverwalk River Park would not be created to serve the community. Instead, the site would be left as it exists today and the golf course would remain in operation.

ES.7.2.4 Alternative 2 – Reduced Development Intensity/Operational Air Quality Impact Avoidance

As presented in Section 5.5, *Air Quality*, the project would result in a cumulatively significant impact associated with operational (vehicular) air emissions. Based on the size and scope of the project, there are no feasible measures for reducing air quality impacts; and impacts would remain significant and unmitigated.

A Reduced Development Intensity/Operational Air Quality Impact Avoidance alternative was evaluated that would reduce proposed development intensity to a level such that significant operational air quality impacts would be avoided. Development under this alternative would develop the project site in the same locations and overall footprint as the project but would reduce development to 2,275 residential units, 106,000 square feet commercial retail space, and 700,000 square feet of commercial and office and non-commercial retail space. Thus, this alternative would result in 47 percent less residential units and 30 percent less commercial and office and non-commercial retail uses. Areas for park, open space, and trails would remain the same as the project. Grading, on-site public street infrastructure, and improvements to Fashion Valley Road, would also remain the same as the project. Some off-site roadway improvements required for the project may not be required under this alternative, as less development intensity would generate less traffic. Future development under this alternative would have similar characteristics as the project, albeit at a reduced level, and would follow the Riverwalk Specific Plan design guidelines and development regulations proposed by the Riverwalk Specific Plan. This alternative would require application of zones that reflect the reduced development intensity and modifications to the proposed Riverwalk Specific Plan to reflect the land use intensity associated with this alternative.

ES.7.2.4 Alternative 3 – Reduced Development Intensity/Operational Air Quality Impact Avoidance and Minimized Historical/Tribal Cultural Resources Impacts

As presented in Section 5.5, *Air Quality*, the project would result in a cumulatively significant impact associated with operational (vehicular) air emissions. Based on the size and scope of the project, there are no feasible measures for reducing air quality impacts; and impacts would remain significant and unmitigated. Additionally, as presented in Section 5.6, *Historical Resources*, the project has the potential to result in direct impacts to known cultural sites as a result of grading needed to remove soils and render the site suitable for development. By eliminating areas of development where some subsurface resources occur, impacts would be reduced. Therefore, a Reduced Development Intensity/Operational Air Quality Impact Avoidance and Minimized Historical/Tribal Cultural Resources Impacts alternative was evaluated that reduces development intensity to a level such that significant operational air quality impacts would be avoided. Additionally, under this alternative, mixed-use development would be eliminated in areas where grading has the potential to affect significant historical resources and tribal cultural resources.

This alternative would develop the project site with a reduced development intensity that would result in 2,200 residential units; 40,000 square feet commercial retail space; 900,000 square feet of commercial and office and non-commercial retail space and 114 acres of park, open space, and trails. Thus, this alternative would result in 51 percent less residential units, 18 percent less commercial and office and non-commercial retail uses, and 17 percent more parks when compared to the project. This alternative would require application of zones that reflect the reduced development intensity and modifications to the proposed Riverwalk Specific Plan to reflect the land

use intensity associated with this alternative.

Future development under this alternative would have similar characteristics as the project, albeit at a reduced level, and would follow the same design guidelines and development regulations proposed by the Riverwalk Specific Plan as would the project. Grading and public street infrastructure, including improvements to Fashion Valley Road, would also remain the same as shown for the project with the following exceptions:

- Development would not occur on Lots 16 through 25 and Lots 39 and 40, to avoid potential disturbance of Sites SDI-11767 and SDI-12220.
- Development would not occur on Lot 31 to avoid potential disturbance of Site SDI-12126.
- Extension of Riverwalk Drive beyond its current western terminus, as well as development of Street 'J1' and Street 'J2' would not occur to avoid potential disturbance of Site SDI 11767.
- Construction of the Street 'J2' vehicular tunnel under the MTS trolley tracks would not occur, to avoid potential disturbance of Site SDI 11767.
- Development on Lots 32 through 37 would not occur, as these lots would not be afforded at least two methods of ingress and egress without Riverwalk Drive and Streets 'J1' and 'J2'.

As such, no development would occur south of the trolley tracks and north of the San Diego River (i.e., all of the Central District of the Riverwalk Specific Plan). Approximately one-third of the developable area in the North District would be removed. Development density and intensity shown would be accommodated in the remaining portion of the North District and the South District.

ES.7.3 Environmentally Superior Alternative

Based on the comparison of the overall environmental impacts for the described alternatives, the No Project/No Build alternative is identified as the environmentally superior alternative. The No Project/No Build alternative would not result in any of the environmental effects associated with the project and would avoid all significant impacts. The No Project/No Build alternative would not meet any objectives of the project.

Of the remaining alternatives, the Environmentally Superior Alternative is the Reduced Development Intensity – Operational Air Quality Impact Avoidance and Minimized Historical/Tribal Cultural Resources Impacts alternative as it could reduce or avoid the significant environmental effects associated with the project. More specifically, cumulatively significant operational air quality impacts and reduced impacts to historical resources and tribal cultural resources when compared to the project while meeting the project objectives, but to a lesser extent as compared to the project.

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

Environmental Impacts	Mitigation Measures	Level of Significance After Mitigation
<p>Biological Resources</p> <p>The project would result in direct significant impacts to approximately 0.64 acre of wetland/riparian vegetation communities (southern cottonwood-willow riparian forest, coastal and valley freshwater marsh).</p> <p>The project would result in indirect impacts if the least Bell's vireo, southwestern willow flycatcher are present, construction occurs during the period March 15 through September 15 (May 1 and September 1 for the flycatcher), and construction noise levels exceed 60 decibels dB(A) hourly average at the edge of occupied habitat.</p>	<p>Mitigation measure 5.4-1 – 5.4-5 presented in Section 5.4, <i>Biological Resources</i>, would mitigate potential direct and indirect impacts to biological resources to below a level of significance.</p>	<p>Mitigated to below a level of significance.</p>
<p>Air Quality</p> <p>The project would result in cumulatively significant air quality impacts associated with project operations at buildout due to vehicular emissions.</p>	<p>Based on the size and scope of development, there are no feasible methods for reducing all cumulative emissions to meet daily SDAPCD standards for ROG, CO, and PM₁₀ and the annual standard for PM₁₀ due to the projected increase in traffic associated with project buildout. Operational impacts remain significant and unmitigable.</p>	<p>Significant and unmitigable.</p>
<p>Historical Resources</p> <p>The project would result in direct impacts to unknown subsurface archaeological resources including potential impacts to unknown human remains as a result of grading.</p>	<p>Mitigation measures 5.6-1 and 5.6-2 presented in Section 5.6, <i>Historical Resources</i>, would mitigate potential impacts to unknown subsurface archaeological resources and unknown human remains to below a level of significance.</p>	
<p>Noise</p> <p>The project would result in significant noise impacts from ground-level HVAC units that may increase ambient conditions by three dBA or more.</p> <p>The project could result in noise impacts to wildlife species in the MHPA from individual events at the amphitheater.</p>	<p>Mitigation measure 5.8-1, presented in Section 5.8, <i>Noise</i>, would mitigate potential noise impacts associated with ground level HVAC units to below a level of significance.</p> <p>Mitigation measure 5.8-2, presented in Section 5.8, <i>Noise</i>, would mitigate potential noise impacts to wildlife species associated with noise from</p>	<p>Mitigated to below a level of significance.</p> <p>Mitigated to below a level of significance.</p>

Environmental Impacts	Mitigation Measures	Level of Significance After Mitigation
	amphitheater uses to below a level of significance.	
Tribal Cultural Resources The area is considered sensitive for Tribal Cultural Resources (TCRs) as identified by Lipay Nation of Santa Isabel and Jamul Indian Village, affiliated traditionally and culturally with the project area. Therefore, there is the potential for TCRs to be significantly impacted by project implementation.	Mitigation Measures 5.10-1 through 5.10-4 presented in Section 5.10 <i>Tribal Cultural Resources</i> , would mitigate impacts to TCRs to below a level of significance.	Mitigated to below a level of significance.

1.0 INTRODUCTION

This chapter provides a brief scope of the project, the purpose and legal authority for this Environmental Impact Report (EIR), the EIR scope and process, and an explanation of how the EIR is organized.

1.1 Project Scope

The Riverwalk project proposes to redevelop the 195-acre Riverwalk Golf Course property with a master-planned neighborhood development in accordance with the proposed Riverwalk Specific Plan. The Riverwalk Specific Plan is a comprehensive planning document that provides a policy framework and development regulations to guide future transit-oriented, mixed-use development consistent with the City's General Plan City of Villages strategy. The Specific Plan is intended to further express General Plan and Mission Valley Community Plan policies through the provision of site-specific recommendations that implement Citywide goals and policies, address community needs, and guide zoning in the Specific Plan.

Overall, the Riverwalk Specific Plan would allow for the development of 4,300 multi-family residential dwelling units; 152,000 square feet of neighborhood retail space; 1,000,000 square feet of office space; approximately 97 acres of park, open space, and trails; adaptive reuse of the existing golf clubhouse into a community amenity; and a new Metropolitan Transit System (MTS) Green Line Trolley transit stop within the development. (For a full description of the proposed project, please see Chapter 3.0, *Project Description*.)

The Riverwalk project requires the following discretionary actions:

- Levi-Cushman Specific Plan rescission,
- Mission Valley Community Plan Amendment,
- General Plan Amendment,
- Riverwalk Specific Plan,
- Rezones,
- Vesting Tentative Map (VTM),
- Site Development Permit (SDP),
- Conditional Use Permit (CUP No. 94-0563) Amendment,
- Public Right-of-Way and Easement Vacations,
- Park General Development Plan (GDP) for a future park,
- Financing District Formation,
- Public Improvement Agreements, and
- Development Agreement.

1.2 Purpose and Legal Authority

An EIR is an informational document and provides decision-makers, public agencies, and the public in general with detailed information about the potential significant adverse environmental impacts of the project, Riverwalk Specific Plan (referred to as “Specific Plan,” when referring to the Riverwalk Specific Plan and/or Specific Plan area; or “project”, when referring to the entirety of the project, which would include off-site improvements), and associated actions. This document has been prepared in accordance with, and complies with, all criteria, standards, and procedures of the California Environmental Quality Act (CEQA) of 1970, as amended [Public Resources Code (PRC) 21000 et seq.]; the State CEQA Guidelines [California Administrative Code (CAC) 15000 et seq.]; and the City of San Diego’s Environmental Impact Report Preparation Guidelines (2005).

Per Section 21067 of CEQA and Section 15367 of the State CEQA Guidelines, the City of San Diego is the Lead Agency under whose authority this document has been prepared. The analysis and findings in this document reflect the independent analysis and conclusions of the City of San Diego.

1.3 Environmental Impact Report Scope

The EIR discusses the potential significant adverse effects of the project. As a project-level EIR, this document focuses *primarily on the changes in the environment that would result from the development project*. According to Section 15161 of the State CEQA Guidelines, a project EIR should *examine all phases of the project including planning, construction, and operation*. Where this EIR has determined that certain environmental impacts would be potentially significant, mitigation measures directed at reducing or avoiding significant adverse environmental effects have been identified. In addition, feasible alternatives to the proposed project have been developed. An analysis of the impacts of project alternatives compared to those of the project provides a basis for consideration by decision-makers.

As described in Section 15152 of the State CEQA Guidelines, tiering refers to *“using the analysis of general matters in a broader EIR (such as one prepared for a general plan or policy statement) with later EIRs and negative declarations on narrower projects; incorporating by reference the general discussions from the broader EIR; and concentrating the later EIR or negative declaration solely on the issues specific to the later project.”* This tiered approach allows incorporation by reference the information, analysis, and mitigation measures from the “first tier” document that are relevant to a specific project. The project site is located in the Mission Valley Community Plan area. The Mission Valley Community Plan Update (CPU) Program EIR provided a program-level environmental analysis that covers the project site. This EIR incorporates and relies upon relevant analysis from the Mission Valley CPU EIR related to the evaluation of cumulative impacts and expands upon and refines such information where warranted. The Mission Valley CPU Program EIR is available for review on the City of San Diego website.

1.4 Notice of Preparation/ Scoping Meeting

The City concluded that the project could result in potentially significant environmental effects. As Lead Agency, the City prepared a Notice of Preparation (NOP) which was distributed to responsible and trustee agencies, as well as various other governmental agencies, and interested organizations and individuals on April 6, 2018. The purpose of the NOP was to solicit comments on the scope and analysis to be included in the EIR for the Riverwalk project. A copy of the NOP and letters received during its review are included in Appendix A. In addition, comments were also gathered at a public scoping meeting held for the project on April 24, 2018. A transcript of this public scoping meeting is included in Appendix B.

Comment letters received during the NOP public scoping period expressed concern regarding biological resources, tribal cultural resources, hydrology, transportation/circulation, and health and safety. These concerns have been identified as areas of known controversy and are analyzed in Chapter 5.0, *Environmental Analysis*, of this EIR.

Based on initial review of the project by the City and comments received during review of the NOP and at the public scoping meeting, the City of San Diego determined that the EIR for the project should address the following environmental issues.

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

1.5 Responsible and Trustee Agencies

State law requires that all EIRs be reviewed by trustee and responsible agencies. A Trustee Agency is defined in Section 15386 of the State CEQA Guidelines as *a state agency having jurisdiction by law over natural resources affected by a project that is held in trust for the people of the State of California*. Per Section 15381 of the CEQA Guidelines, *the term 'Responsible Agency' includes all public agencies other than the Lead Agency which have discretionary approval power over the project*. For the Riverwalk project, the following have been identified as Responsible and/or Trustee agencies.

1.5.1 California Department of Fish and Wildlife

Pursuant to Section 1602 of the State of California Fish and Game Code, the California Department of Fish and Wildlife (CDFW) has the authority to reach an agreement with a private party proposing to affect an intermittent or permanent streambed (including wetlands habitat). The CDFW generally relies upon the technical data gathered as part of the CEQA documentation (EIR) and attempts to satisfy their permit concerns in these documents. In accordance with the policy of “*no net loss of wetland habitat*,” the CDFW requires mitigation for all impacts to wetlands, regardless of acreage. Because the project would affect a State jurisdictional area, an application for a Streambed Alteration Agreement would be submitted following certification of the EIR. (Biological impacts, including impacts to wetland habitats, are addressed in Section 5.4, *Biological Resources*, of this EIR.)

1.5.2 Regional Water Quality Control Board

Pursuant to Section 401 of the Clean Water Act (CWA), the local Regional Water Quality Control Board (RWQCB (Region 9) would be responsible for issuing a waiver or certification for any project actions resulting in the discharge of runoff from the site. Conformance with the CWA is established through compliance with the requirements of the National Pollution Discharge Elimination System (NPDES) for discharge of storm water runoff associated with construction activity. Compliance also requires conformance with applicable Best Management Practices (BMPs) and development of a Storm Water Pollution Prevention Plan (SWPPP) and monitoring program plan. (Water Quality is addressed in Section 5.14, *Water Quality*, of this EIR.)

1.5.3 California Department of Transportation

The project would result in transportation improvements to State freeways under the control of California Department of Transportation (Caltrans), consistent with the project’s Transportation Improvement Plan. These improvements include fair-share contribution through the Development Impact Fee (DIF) program for interchange improvements, funding of Project Study Reports (PSRs), transit priority signals, and intelligent transportation system (ITS) improvements. The project applicant would be coordinating with Caltrans for these improvements. (See Section 5.2, *Transportation and Circulation*, for additional discussion.)

1.5.4 California Public Utilities Commission

The California Public Utilities Commission (CPUC) regulates privately-owned railroad and rail transit, including the MTS Light Rail Transit (LRT) trolley that traverses the project site. CPUC staff ensures that highway-rail and pathway-rail crossings are safely designed, constructed, and maintained. The Rail Crossings and Engineering Branch engineers investigate and evaluate requests to construct new rail crossings or modify existing crossings. The project applicant would be required to coordinate with the CPUC for project grading and/or improvements that could affect the trolley line.

1.5.5 U.S. Army Corps of Engineers

The U.S. Army Corps of Engineers (USACE) has jurisdiction over the discharge of dredged materials into waters of the United States, including wetlands, under Section 404 of the CWA. The San Diego River is identified as jurisdictional waters of USACE, and the project would require a 404 permit from USACE. (Section 5.4, *Biological Resources*, of this EIR addresses the San Diego River, its associated habitat, and impacts associated with the project.)

1.5.6 U.S. Fish and Wildlife Service

Acting under the Federal Endangered Species Act (ESA), the U.S. Fish and Wildlife Service (USFWS) is responsible for ensuring that any action authorized, funded, or carried out by a Federal agency (such as USACE) is not likely to jeopardize the continued existence of listed species or modify their crucial habitat. Accordingly, the USFWS would provide input to the USACE as part of the Section 404 process.

1.5.7 Federal Emergency Management Agency

The Federal Emergency Management Agency (FEMA) manages the National Flood Insurance Program, which aims to reduce the impact of flooding on private and public structures. It does so by providing affordable insurance to property owners, renters and businesses and by encouraging communities to adopt and enforce floodplain management regulations. These efforts help mitigate the effects of flooding on new and improved structures. Overall, the program reduces the socio-economic impact of disasters by promoting the purchase and retention of general risk insurance, but also of flood insurance, specifically. The project has processed a Conditional Letter of Map Revision (CLOMR), which FEMA has approved.

1.6 Availability and Review of the Draft EIR

This EIR has been made available for review to members of the public and public agencies for 45 calendar days (from May 15, 2020 to June 29, 2020) to provide comments *"on the sufficiency of the document in identifying and analyzing the possible impacts on the environment and ways in which the significant effects of the project might be avoided or mitigated"* (14 California Code of Regulations [CCR] 15204). The draft EIR and associated technical appendices were placed on the City of San Diego website:

<https://www.sandiego.gov/ceqa/draft>

The City, as Lead Agency, will consider the written comments received on the Draft EIR following the end of the public review period. Responses to the public review comments relevant to the adequacy and completeness of the Draft EIR are prepared and compiled into the Final EIR. In addition, any

changes to the Draft EIR that result from comments will be incorporated into the Final EIR. All persons who comment on the EIR will be notified of the availability of the Final EIR and the date of the public hearing before the decision-maker.

1.7 Content of EIR

In accordance with Sections 15120 through 15132 of the State CEQA Guidelines, the EIR is formatted to address the required contents of an EIR. Technical studies have been summarized within individual environmental issue sections. The EIR has been organized in the following manner:

- **Executive Summary** is provided at the beginning of this document, which includes the conclusions of the environmental analysis and a comparative summary of the project with the alternatives analyzed in the EIR, as well as areas of controversy and any issues to be resolved.
- **Chapter 1.0 Introduction** introduces the purpose of the EIR, provides a discussion of the public review process, and includes the scope and format of the EIR.
- **Chapter 2.0 Environmental Setting** provides a description of the project location and the environment of the project site, as well as the vicinity of the project site, as it exists before implementation of the proposed project.
- **Chapter 3.0 Project Description** details the physical and operational characteristics of the project, provides the purpose and objectives of the project, and presents the required discretionary actions.
- **Chapter 4.0 History of Project Changes** chronicles any changes that have been made to the project in response to environmental concerns raised during the City's review of the project.
- **Chapter 5.0 Environmental Analysis** includes a description of the existing conditions relevant to each environmental topic; presents the threshold(s) of significance, based on the City of San Diego's *California Environmental Quality Act Significance Determination Thresholds* (July 2016), for the particular issue area under evaluation; identifies an issue statement or issue statements; assesses any impacts associated with implementation of the project; provides a summary of the significance of any project impacts; and presents recommended mitigation measures and mitigation monitoring and reporting, as appropriate, for each significant issue area.
- **Chapter 6.0 Cumulative Effects** addresses the cumulative impacts caused by the project in combination with other past, present, and reasonably foreseeable future development in the area.
- **Chapter 7.0 Effects Found Not to be Significant** presents a brief discussion of the environmental effects of the project that were evaluated and were found not to be potentially significant.

- **Chapter 8.0 Significant Irreversible Environmental Changes** discusses any significant irreversible environmental changes that would be caused by the project, should it be implemented.
- **Chapter 9.0 Growth Inducement** discusses the ways in which the project could foster economic or population growth.
- **Chapter 10.0 Alternatives** provides a description and evaluation of alternatives to the project which could avoid or reduce potentially significant environmental impacts associated with implementation of the project.
- **Chapter 11.0 Mitigation Monitoring and Reporting Program** documents the various mitigation measures required as part of the project.
- **Chapter 12.0 References** includes a list of the reference materials consulted in the course of the EIR's preparation.
- **Chapter 13.0 Individuals and Agencies Consulted** includes a list of agencies and individuals contacted during preparation of the EIR and lists those persons and agencies responsible for the preparation of the EIR.

Tables and figures are provided as necessary to illustrate and support text within this EIR. Tables that are less than one-page in length are located within the body of the text of the chapter or section in which they are introduced; tables greater than one-page in length are located at the end of the chapter or section. All figures are located at the end of the chapter or section in which they are introduced, following any tables, as applicable.

2.0 ENVIRONMENTAL SETTING

The Environmental Setting chapter provides a description of the existing physical conditions for the Riverwalk Specific Plan and off-site improvement areas. Additionally, this chapter provides an overview of the existing local and regional environmental setting per Section 15125 of the CEQA Guidelines, as well as the regulatory planning context. Also provided in this chapter is a general discussion of the planning context within which the project is evaluated. Greater details relative to the setting of each environmental issue area addressed in this EIR are provided at the beginning of each issue section impact area discussion presented in Chapter 5.0, *Environmental Analysis*, of this EIR.

CEQA Guidelines Section 15125(a) guides the discussion of the environmental setting for the proposed project and advises in the establishment of the project baseline. According to CEQA, *[a]n EIR must include a description of the physical environmental conditions in the vicinity of the project...The purpose of this requirement is to give the public and decision makers the most accurate and understandable picture practically possible of the project's likely near-term and long-term impacts.*

2.1 Regional Setting

The project site is located in the Mission Valley community of the City of San Diego, within San Diego County (see Figure 2-1, *Regional Map*). The City covers approximately 206,989 acres in the southwestern section of San Diego County, in Southern California. The Mission Valley community is located in the central portion of the City of San Diego and the San Diego Metropolitan area. The community is located approximately four miles north of downtown San Diego and four to five miles east of the Pacific Ocean. The communities of Linda Vista, Serra Mesa, and Tierrasanta are located north of Mission Valley. Kensington-Talmadge, Normal Heights, Greater North Park, Uptown, and Old Town San Diego are located to the south of Mission Valley. Mission Bay Park is located west of Mission Valley. The communities of Navajo and College Area are located east of Mission Valley. As shown in Figure 2-2, *Vicinity Map*, the Specific Plan area is located in the west-central portion of the Mission Valley community.

2.2 Project Location and Surrounding Land Uses

As shown in Figure 2-3, *Project Location Map*, the approximately 195-acre site is located south of Friars Road, north of Hotel Circle North, and west of Fashion Valley Road in the Mission Valley community. The site is immediately north of Interstate 8 (I-8), approximately one mile west of State Route 163 (SR 163), and approximately two miles east of Interstate 5 (I-5). The site is surrounded by urban development. Multi-family residential developments exist to the west and northeast. To the north are multi-family residential and commercial office developments. Commercial retail development (Fashion Valley Mall) and hospitality use (Town and Country Resort Hotel, currently

being redeveloped as a mixed-use project, which will ultimately include residential uses) are located east of the site. A mix of office, residential, and hotel uses, as well as I-8, are located south of the site. The San Diego River runs in an east-west manner through roughly the center of the project site; the Green Line Trolley traverses the Specific Plan area in an east-west manner in the upper portion of the site, roughly parallel to Friars Road. An approximately 15-acre vacant property owned by the MTS is located immediately west of the site.

Regional access to the site is provided by I-8, SR 163, and I-5. Primary vehicle access to the site would occur at Fashion Valley Road from the east, Hotel Circle North from the south, and Friars Road from the north.

2.3 Existing Site Conditions

Figure 2-4, *Existing Site Conditions*, depicts the current development on the site. The site slopes gently towards the San Diego River, which curves through the central portion of the site. Elevations vary between 67 feet above mean sea level (AMSL) along the northern side of the Specific Plan area to 16 feet AMSL near the western river edge. The average (non-flood) river water level varies from 12 feet AMSL in the west to 15 feet AMSL in the east. Site drainage runs within pipes and over the land surface towards the San Diego River, which flows into the west and ultimately empties into the Pacific Ocean.

Under existing conditions, a large portion of the site is within the San Diego River floodplain and floodway, which is mapped on FEMA's May 16, 2012, Flood Insurance Rate Map No. 06073C1618G. (See Figure 2-5, *FEMA 100-Year Floodway and Floodplain Map*.) The floodplain and floodway flow in a westerly direction and are primarily south of the trolley. An off-site natural hillside area to north conveys flows to the site via storm drain facilities along Friars Road. The on- and off-site runoff are ultimately conveyed to the San Diego River.

The site has been previously graded and is developed with the Riverwalk Golf Course, comprised of three nine-hole golf courses, driving range, clubhouse building, maintenance facilities, surface parking, access roadways, and golf cart paths/bridges. The three nine-hole courses include the Friars Course in the north, the Presidio Course in the middle-western area, and the Mission Course in the south. Two holes of the Presidio Course occur on MTS-owned land, outside of the premises. There are numerous sand traps, water features, irrigation pipes, and sprinklers throughout the course. Parking is accommodated within surface parking lots. Landscaping consists of turf, non-native ornamental vegetation, and trees. The San Diego MTS Green Line Trolley crosses the site parallel to the river, approximately 300 to 800 feet north of the river. The trolley line was constructed on a raised berm across the site. Two under-crossing tunnels occur under the tracks that are large enough for two golf carts (side-by-side). Additionally, two bridges cross the San Diego River that support golf carts and lightweight vehicles.

2.4 Planning Context

This section provides a brief overview of the planning context relevant to the project.

2.4.1 City of San Diego General Plan

The General Plan designates the site as Commercial Employment, Retail, and Services, in the northeastern and central portions of the site; Multiple Use, in the northern and southern portions of the site; Residential, in the western portion of the site; and Park, Open Space, and Recreation, in the central portion of the site (Figure 2-6, *City of San Diego General Plan Land Use and Street System Map*).

2.4.2 Mission Valley Community Plan

The Mission Valley Community Plan designates the project site as Residential (High Density) in the northeastern and northwestern portions of the site; Office and Visitor Commercial in the northcentral, northeastern, and southeastern portions of the site; and Potential Park/Open Space in the central portion of the site. In addition, the land use map identifies a future Riverwalk Specific Plan is anticipated for the site (Figure 2-7, *Mission Valley Community Plan Planned Land Use Map*).

2.4.3 Levi-Cushman Specific Plan

The Levi-Cushman Specific Plan was approved by Resolution 269106 for an area that includes the project site by the San Diego City Council in 1987. The 200-acre Levi-Cushman Specific Plan houses the majority of the Riverwalk Golf Course [which operates under Conditional Use Permit (CUP) No. 94-0563]] and is comprised of the 195 acres proposed for redevelopment with the Riverwalk Specific Plan and a five-acre parcel owned by MTS. (This five-acre parcel is part of a larger 15-acre holding of MTS. The entire 15 acres owned by MTS is utilized by the Riverwalk Golf Course, but only five acres of this holding are within the Levi-Cushman Specific Plan; the remaining 10 acres is not a part of the Levi-Cushman Specific Plan.)

The Levi-Cushman Specific Plan identifies the project site for a mix of residential, retail, office, hotel, and recreational uses. (See Figure 2-8, *Levi-Cushman Specific Plan Land Use Map*.) Much of the housing and neighborhood commercial uses approved with the Levi-Cushman Specific Plan were planned to be located on the north side of the San Diego River, with office and hotel development sited on the south side of the river. Central to the Levi-Cushman Specific Plan was the creation of a 12-acre island along the southern edge of the San Diego River to accommodate small-scale specialty retail, office, and residential uses. In total, the Levi-Cushman Specific Plan allows for 1,329 residential dwelling units; 1,000 hotel rooms; 200,000 square feet of retail; 2,582,000 square feet of office; and a minimum of 75 acres of open areas, including the San Diego River, the river buffer, parks, setbacks, hiking/biking/walking trails, theme entries, plazas, and privately maintained open areas within each parcel.

Development allowed under the Levi-Cushman Specific Plan has not occurred. Accordingly, the site continues to operate as Riverwalk Golf Course under CUP No. 94-0563 until such time as redevelopment occurs.

2.4.4 Zoning

Zoning for the site is governed by the City's Land Development Code. The base zones on the site are CC-3-9 (Commercial—Community) in the central, northeastern, and southeastern portions of the site; RM-4-10 (Residential—Multiple Unit) in the northwestern and northeastern portions of the site; OP-1-1 (Open Space—Park) in the central portion of the site, and OC-1-1 (Open Space – Conservation) in the central portion of the site surrounding the San Diego River (see Figure 2-9, *Existing Zoning*).

In addition to the base zones, a Community Plan Implementation Overlay Zone (CPIOZ) is applied within the boundaries of the Levi-Cushman Specific Plan area (per Chapter 13, Article 2, Division 14 of the Municipal Code) to provide supplemental development regulations that are tailored to implement the vision and policies of the Mission Valley Community Plan. The CPIOZ has three subdistricts, two of which apply to the project site. They are the Specific Plan Subdistrict and the San Diego River Subdistrict. The CPIOZ is Type A, meaning *any development permit application within the boundaries of CPIOZ-Type A that complies with the supplemental development regulations can be processed ministerially. Any development permit application within the boundaries of CPIOZ-Type A that does not comply with the supplemental development regulations [...] requires a Process Three Site Development Permit.*

The purpose of the Specific Plan Subdistrict CPIOZ-Type A regulations is to identify properties where a valid specific plan has been adopted by ordinance or a specific plan adopted by ordinance is required for future development. Applications for a CPIOZ-Type A development shall meet the regulations outlined within the corresponding specific plan. The overlay zone supersedes the base zones; therefore, any development proposed for the site would need to be consistent with the land use plan, densities, and intensities described in the Levi-Cushman Specific Plan to be processed ministerially. Any other development program, even one consistent with the base zones, would require discretionary approval.

The purpose of the San Diego River Subdistrict CPIOZ-Type A regulations is to ensure that development along the San Diego River implements the San Diego River Park Master Plan. The River Subdistrict regulations have also been designed to preserve and enhance the character of the San Diego River Valley, to provide for sensitive rehabilitation and redevelopment, and to create the San Diego River Pathway. The San Diego River Subdistrict CPIOZ includes the River Corridor Area and the River Influence Area. The regulations of this zone apply to any development fully or partially within these boundaries. Any deviation from the development standards outlined in the San Diego River Subdistrict would require discretionary approval.

2.4.5 Montgomery Field Airport Land Use Compatibility Plan

The northeast corner of the site is located within Airport Influence Area (AIA) Review Area 2 of Montgomery-Gibbs Executive Airport, compatibility with which is governed by the Montgomery Field Airport Land Use Compatibility Plan (ALUCP) (Figure 2-10, *Montgomery Field ALUCP Airport Influence Area*). The City of San Diego implements the ALUCP policies and criteria with the Supplemental Development Regulations contained in the Airport Land Use Compatibility Overlay Zone (Chapter 13, Article 2, Division 15 of the City's Municipal Code). There are two Review Areas for Montgomery Field. The site area is located within Review Area 2. Review Area 2 involves airspace protection or overflight compatibility. See Section 5.16, *Health and Safety*, for a detailed discussion of project compatibility with the Montgomery Field ALUCP, and Section 5.1, *Land Use*, for a discussion of the project's relationship with the Montgomery Field ALUCP.

2.4.6 San Diego International Airport Airport Land Use Compatibility Plan

The site is located within AIA Review Area 2 of the San Diego International Airport (SDIA) ALUCP (Figure 2-11, *San Diego International Airport ALUCP Airport Influence Area*). Additionally, the site is located within the Airspace Protection Boundary and the Overflight Notification Boundary. The basic function of the SDIA ALUCP (2014) is to *promote compatibility between the airport and the land uses that surround it to the extent that these areas are not already devoted to incompatible land uses*. The ALUCP safeguards the general welfare of the inhabitants within the vicinity of SDIA and the public in general. The ALUCP provides policies and criteria for the City of San Diego to implement and for the Airport Land Use Commission (ALUC) to use when reviewing development proposals. See Section 5.16, *Health and Safety*, for a detailed discussion of project compatibility with the SDIA ALUCP, and Section 5.1, *Land Use*, for a discussion of the project's relationship with the San Diego International Airport ALUCP.

2.4.7 San Diego River Park Master Plan

The San Diego River Park Master Plan (2013) (SDRPMP) provides the vision and guidance to restore the relationship between the San Diego River and the surrounding communities by creating a river-long park, stretching from the Pacific Ocean at Ocean Beach Park to the City's jurisdictional eastern boundary at the City of Santee. The SDRPMP divides the San Diego River into six segments, known as "reaches," and provides specific recommendations for each reach. The site is located within the Lower Valley Reach, which encompasses the entirety of the Mission Valley community from I-15 in the east to I-5 in the west.

The SDRPMP covers the 17.5-mile stretch of the San Diego River and includes two distinct planning areas: the River Corridor Area and the River Influence Area. The River Corridor Area consists of the 100-year floodway along both sides of the San Diego River, plus 35-foot path corridor on each side. The River Influence Area consists of the first 200 feet adjacent to the River Corridor Area, also on

both sides of the San Diego River. The River Corridor Area is located on the site adjacent to the San Diego River. The River Influence Area also covers a portion of the site. (See Figure 2-12, *San Diego River Park Master Plan within Riverwalk Specific Plan Area*.)

2.4.8 San Diego Regional Air Quality Strategy

The San Diego Regional Air Quality Strategy (RAQS) was developed to identify feasible emission control measures and provide expeditious progress toward attaining the State ozone standards. The two pollutants addressed in the RAQS are volatile organic compounds (VOC) and oxides of nitrogen (NOx), which are precursors to the formation of ozone. The San Diego County Air Pollution Control District (APCD) is responsible for RAQS development and implementation. See Section 5.5, *Air Quality*, for a complete analysis of project compliance with the RAQS.

2.4.9 San Diego Forward: The Regional Plan

San Diego Forward: The Regional Plan (RP) was adopted by San Diego Associated of Governments (SANDAG) on October 9, 2015. The RP serves as a blueprint for how the San Diego region will grow and how SANDAG will invest in transportation infrastructure that will provide more choices, strengthen the economy, promote a healthy environment, and support thriving communities. The Regional Plan ensures that tax dollars will be spent for the greatest public good by providing a roadmap to grow and evolve and by prioritizing 35 years of regional transportation projects to create a framework for much of the region's transportation infrastructure. The transportation decisions detailed in the Regional Plan serve an overarching goal: create more transportation choices, which ultimately will lead to healthier communities, healthier people, and a healthier environment. In addition, the Regional Plan has been organized to include the following elements: Policy Element, Sustainable Communities Strategy, Financial Element, and Action Element.

2.4.10 Water Quality Control Plan for the San Diego Basin

The San Diego Regional Water Quality Control Board's Water Quality Control Plan for the San Diego Basin (Basin Plan) is designed to preserve and enhance water quality and protect the beneficial uses of all regional waters. Specifically, the Basin Plan: (1) designates beneficial uses for surface and ground waters; (2) sets narrative and numerical objectives that must be attained or maintained to protect the designated beneficial uses and conform to the State's anti-degradation policy; (3) describes implementation programs to protect the beneficial uses of all waters in the region; and (4) describes surveillance and monitoring activities to evaluate the effectiveness of the Basin Plan. Additionally, the Basin Plan incorporates by reference all applicable State and Regional Board plans and policies.

2.4.11 City of San Diego Environmentally Sensitive Lands Regulations

Chapter 14, Article 3, Division 1 of the SDMC contains Environmentally Sensitive Lands (ESL) regulations. The purpose of the regulations is to *protect, preserve and, where damaged, restore the environmentally sensitive lands of San Diego and the viability of the species supported by those lands*. ESLs are defined to include Sensitive Biological Resources, Steep Hillside, Coastal Beaches, Sensitive Coastal Bluffs, and 100-year Floodplains. Special Flood Hazard Areas within the City are established in accordance with FEMA Flood Insurance Rate Map (FIRM). Any development that requires encroachment into environmentally sensitive land types identified in the ESL Regulations is required to obtain either a Neighborhood Development Permit (NDP) or an SDP. Portions of the site contain sensitive biological resources, 100-year and special flood areas, and floodplains.

Biological Resources

Impacts to biological resources within the Multi Habitat Planning Area (MHPA), must comply with the City's Municipal Code ESL Regulations (Chapter 14, Article 3, Division 1). Outside the Coastal Overlay Zone where the project lies, impacts to wetlands should be avoided. Unavoidable impacts should be minimized to the maximum extent practicable. Whether or not an impact is unavoidable will be determined on a case-by-case basis. If impacts to wetlands cannot be avoided, a deviation from the ESL Regulations is required. Examples of unavoidable impacts include those necessary to allow reasonable use of a parcel entirely constrained by wetlands, roads where the only access to the developable portion of the site results in impacts to wetlands, and essential public facilities (essential roads, sewer, water lines, etc.) where no feasible alternative exists.

Special Flood Hazards Areas

With regard to flood hazard areas, the ESL Regulations contain restrictions relative to the floodway and flood fringe, intended to provide reasonable flood protection for regulatory purposes. Within the floodway, no structures may be attached to a foundation, development must be offset by other improvements to enable the passage of the base flood, and channelization is subject to a number of requirements. Within the flood fringe, permanent structures, roads, and other development may be allowed, provided that they meet applicable conditions.

2.4.12 Multiple Species Conservation Program Subarea Plan/Multi-Habitat Planning Area

The MSCP Subarea Plan is a comprehensive habitat conservation planning program developed to preserve a network of habitat and open space and protect and preserve biodiversity. The MSCP covers a wide range of species found in San Diego and is designed to provide permit-issuance authority to the appropriate local regulatory agencies. The City of San Diego's MSCP provides a process for the issuance of incidental take permits (ITPs) under the federal and state Endangered Species Act and the California Natural Communities Conservation Planning Act. The goal of the City's MSCP Subarea Plan is to conserve sensitive species and biodiversity while continuing to allow for the

2.0 ENVIRONMENTAL SETTING

economic growth of the City. The Subarea Plan establishes a preserve area to delineate core biological resource areas and corridors targeted for conservation, known as the City's MHPA.

The site is located within the City's MSCP area, which covers 206,124 acres within the City's jurisdiction. The nearest MHPA area to the site is the San Diego River, which runs roughly along the middle of the site (Figure 2-13, *MHPA Exhibit*); approximately 6.98 acres are mapped MHPA.

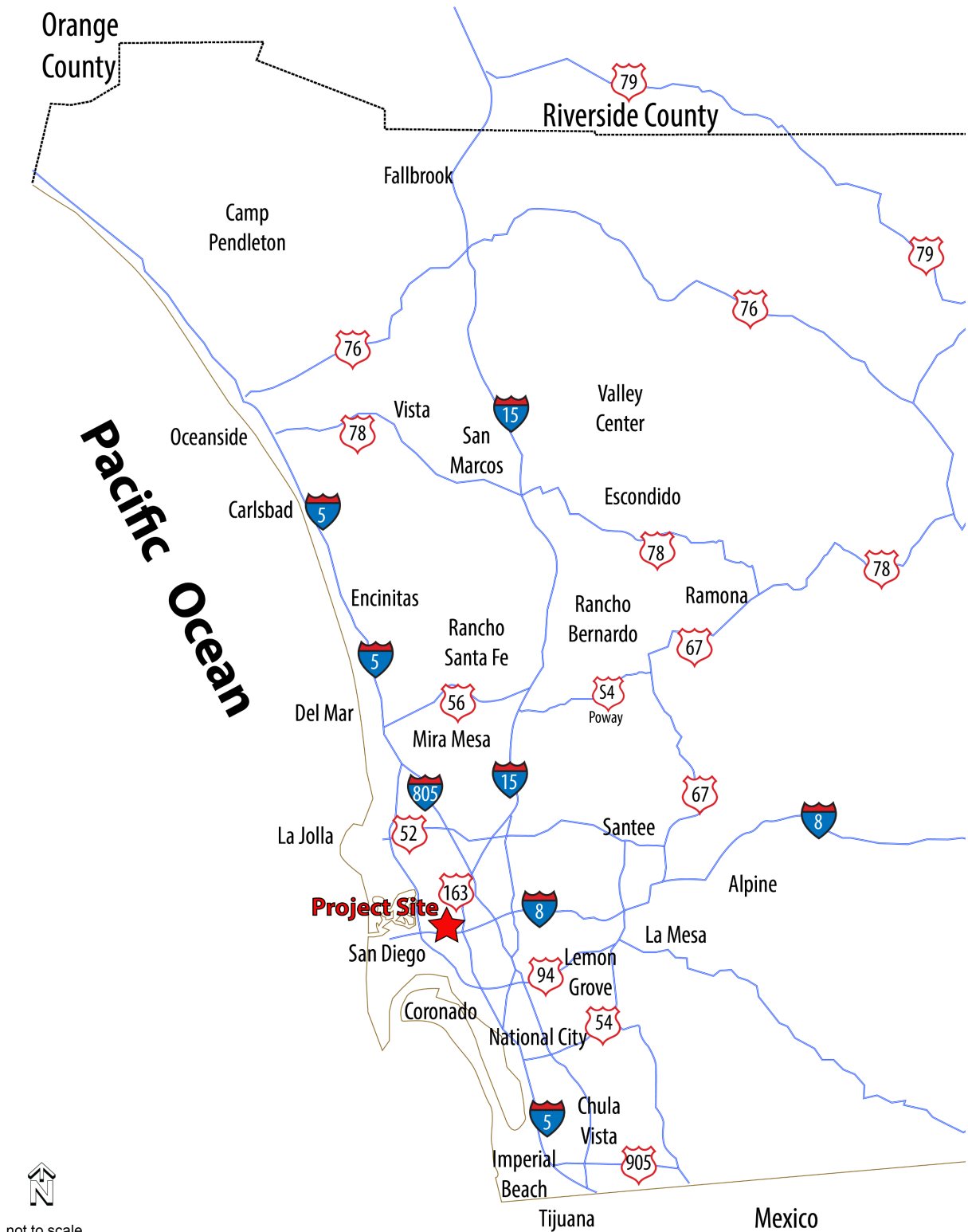


Figure 2-1. Regional Map

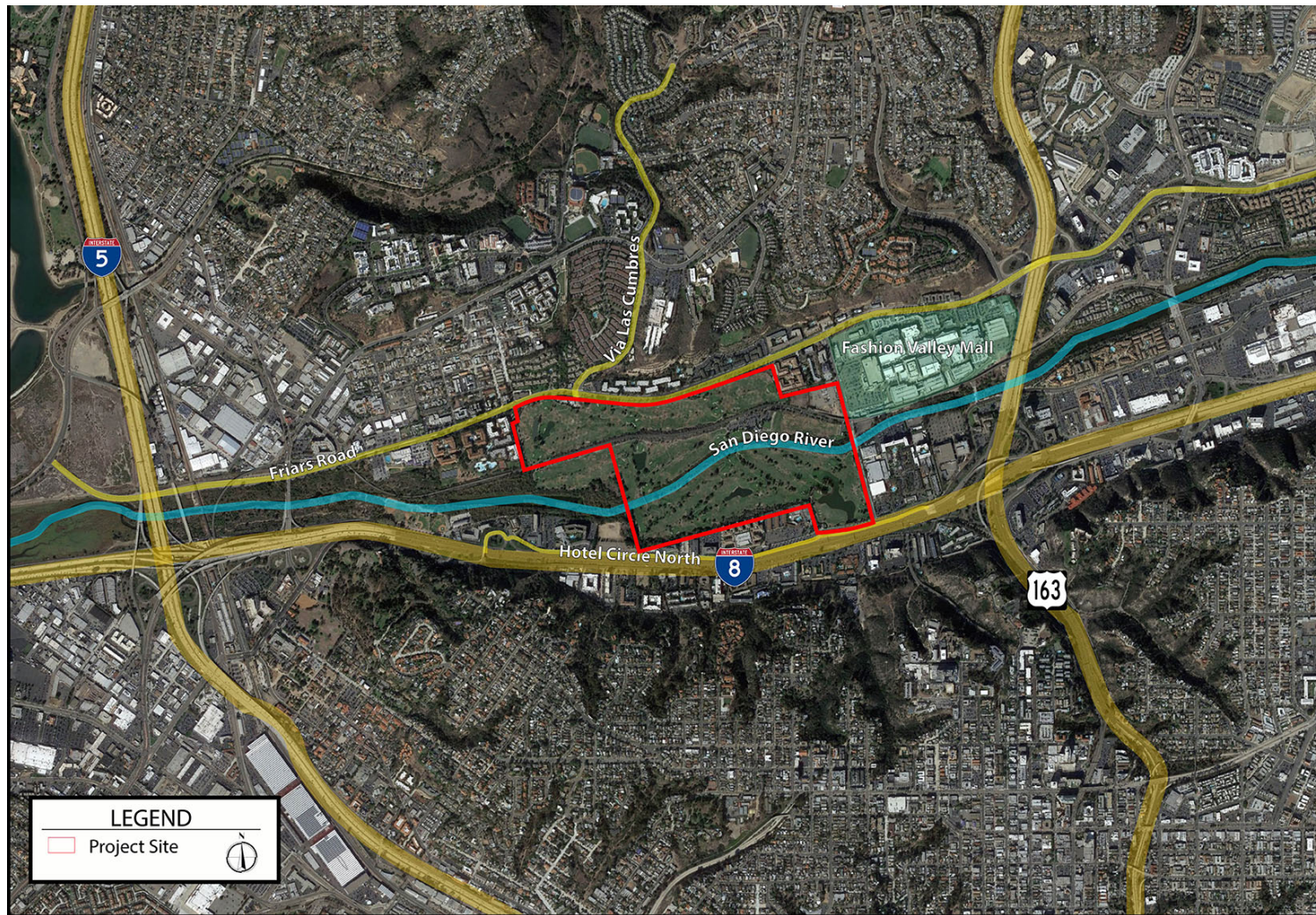


Figure 2-2. Vicinity Map



Figure 2-3. Project Location Map



Figure 2-4. Existing Site Conditions

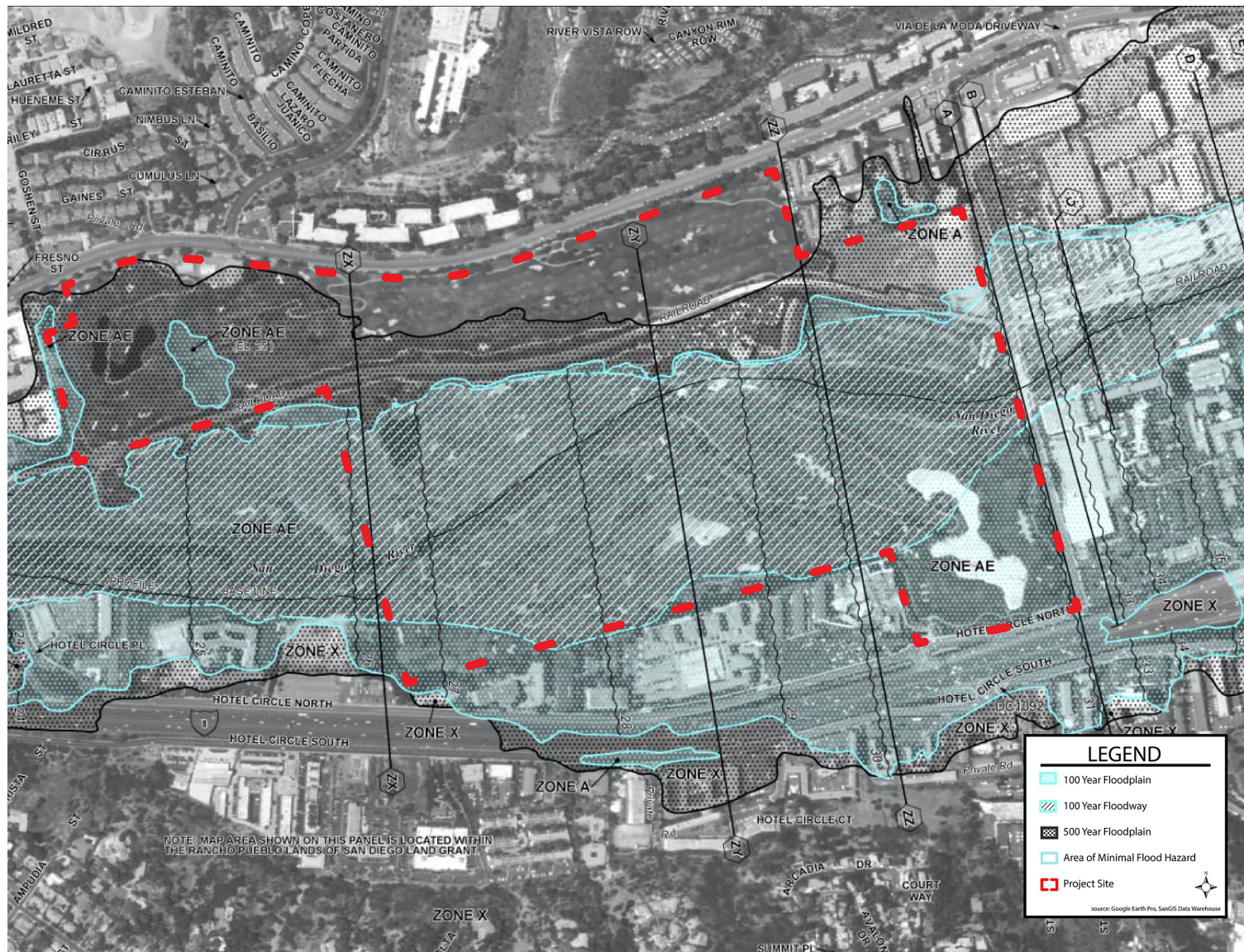


Figure 2-5. FEMA 100-Year Floodway and Floodplain Map

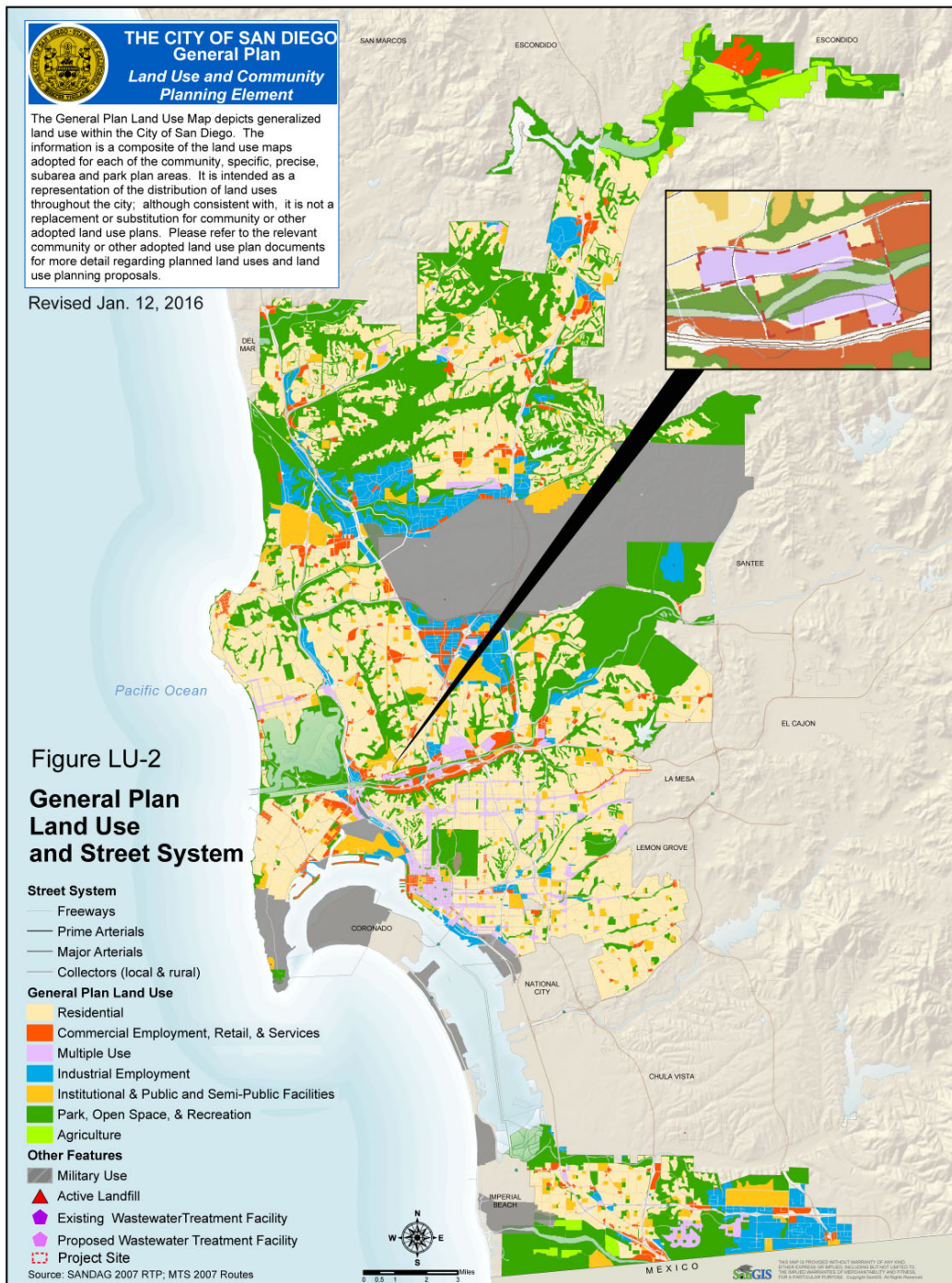


Figure 2-6. City of San Diego General Plan Land Use and Street System Map

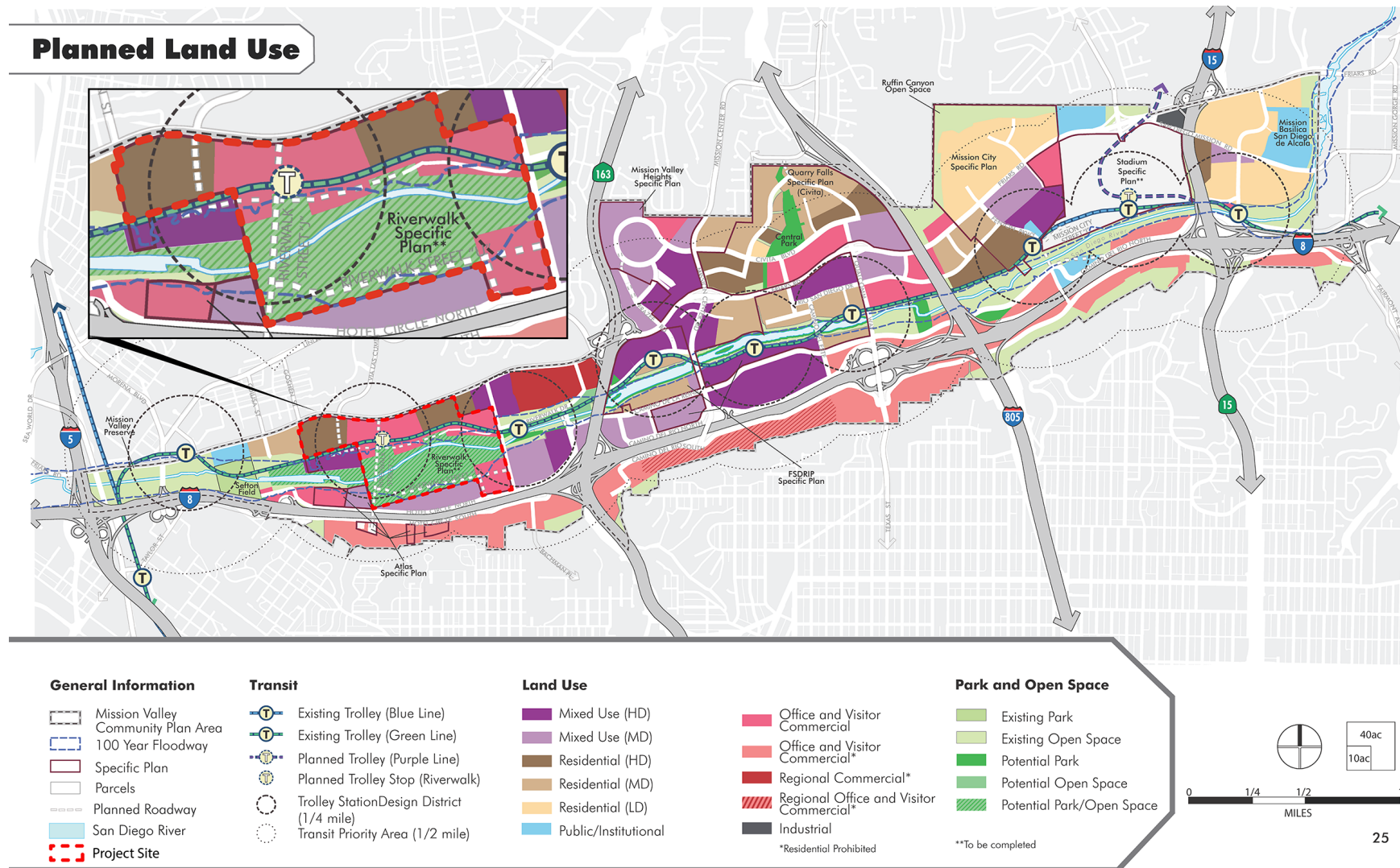


Figure 2-7. Mission Valley Community Plan Planned Land Use Map

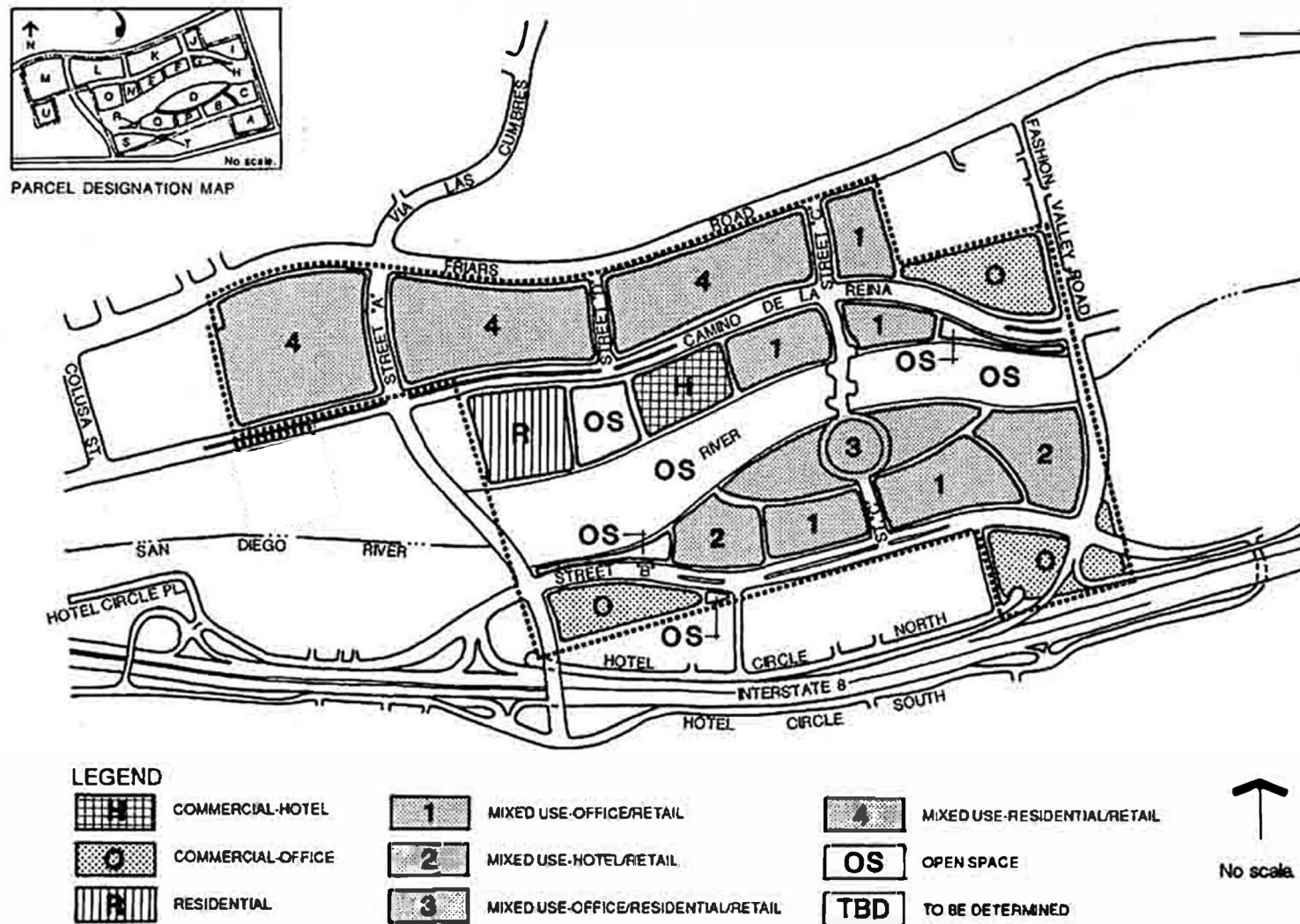


Figure 2-8. Levi-Cushman Specific Plan Land Use Map

2.0 ENVIRONMENTAL SETTING

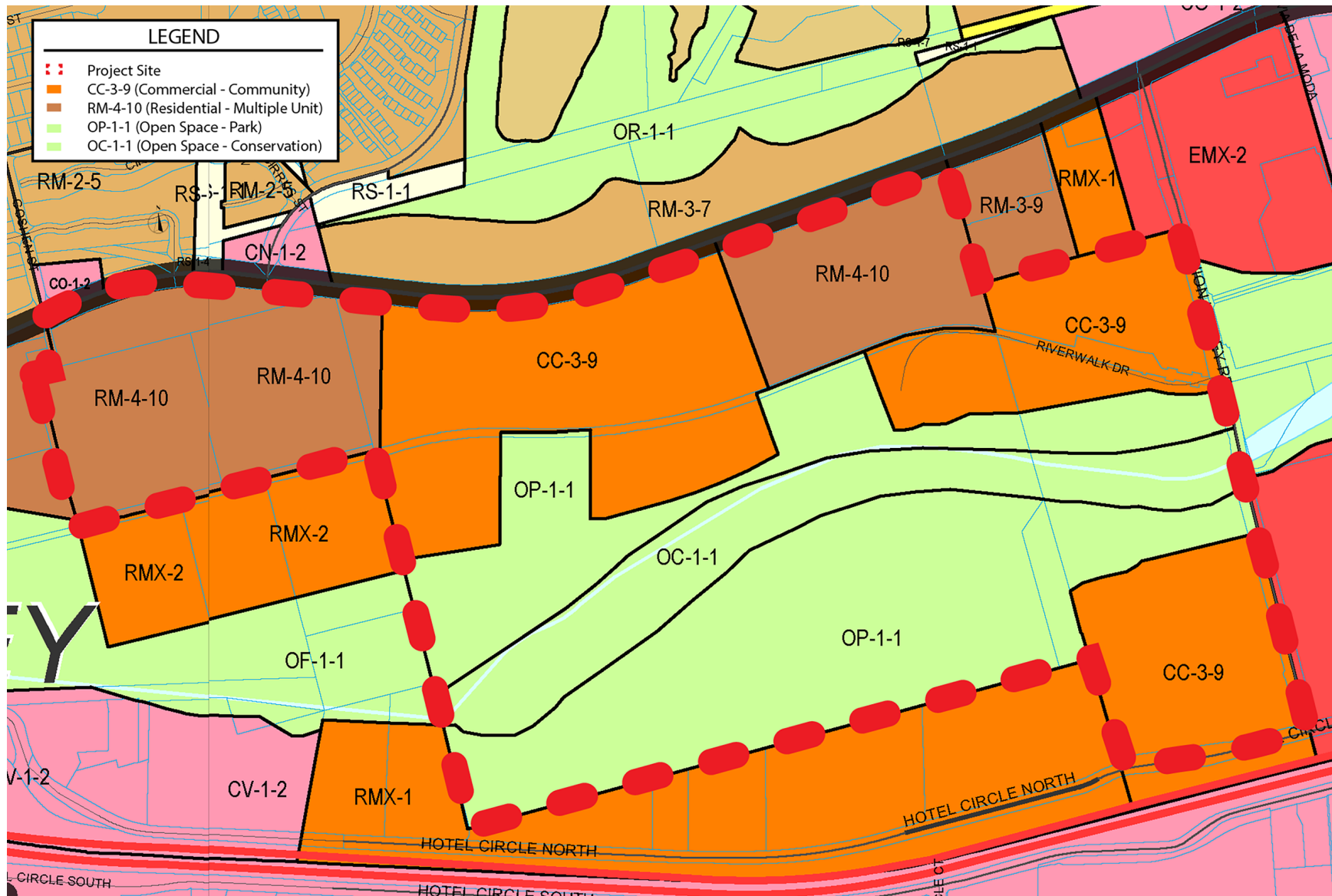


Figure 2-9. Existing Zoning

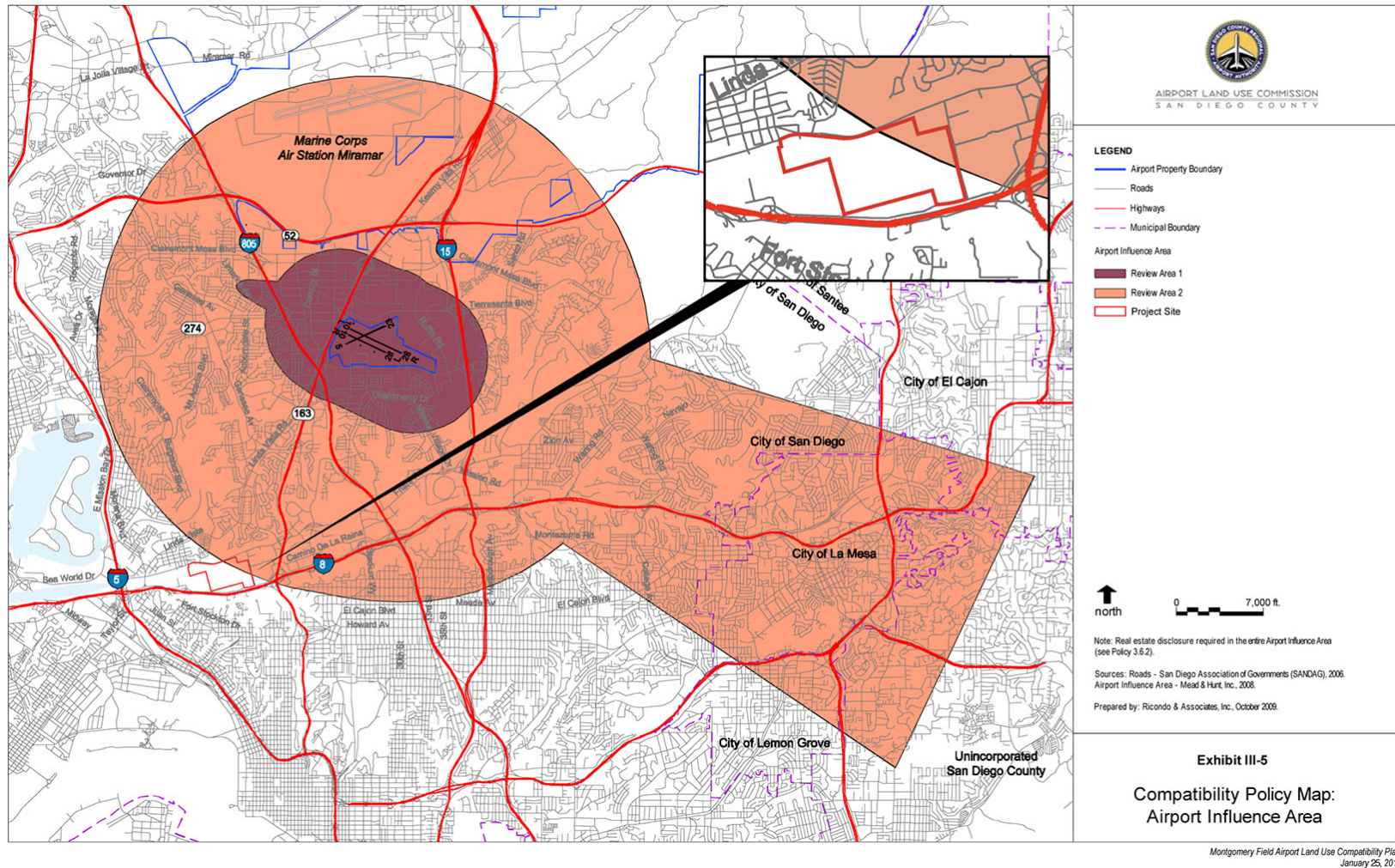


Figure 2-10. Montgomery Field ALUCP Airport Influence Area

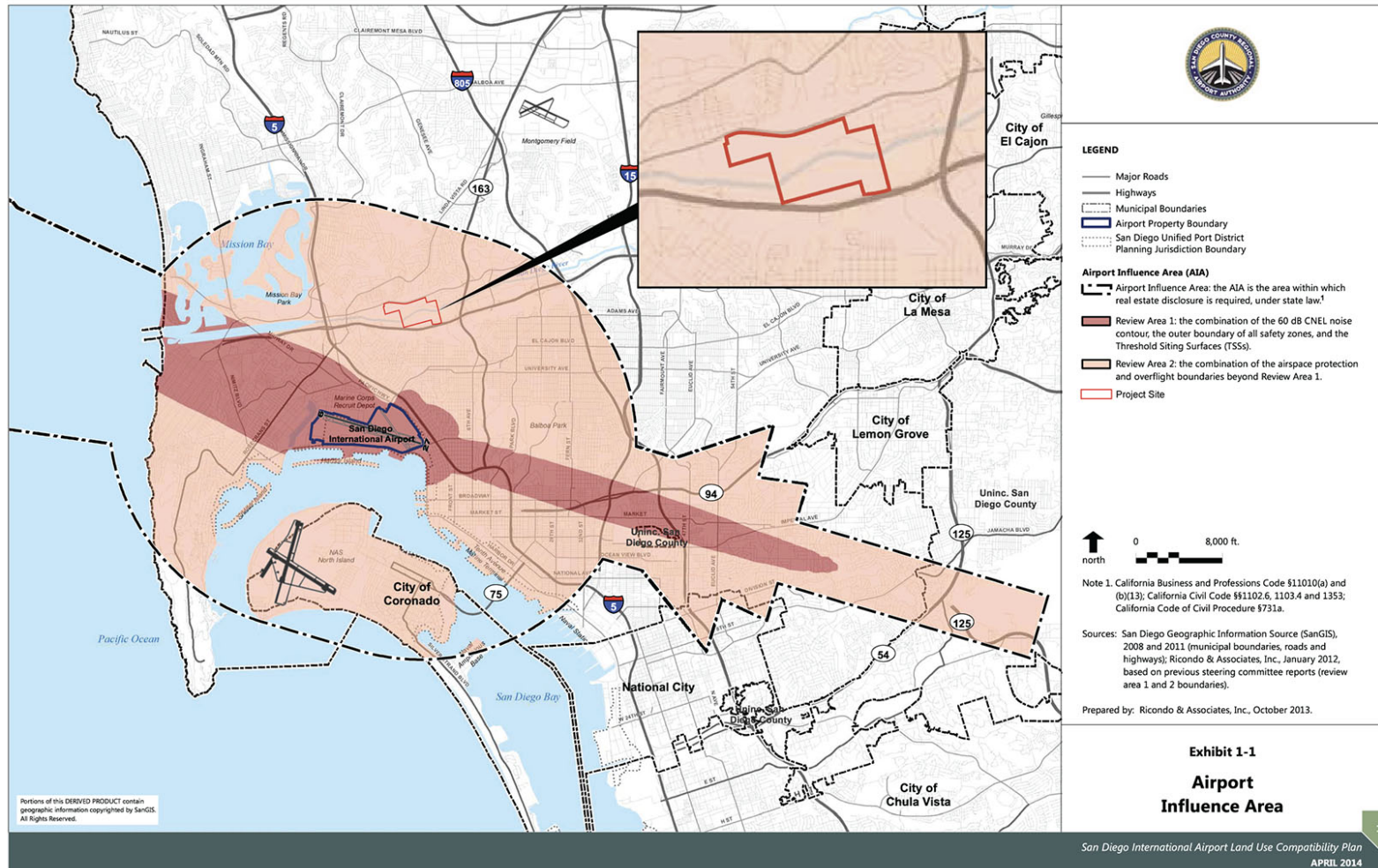


Figure 2-11. San Diego International Airport ALUCP Airport Influence Area

2.0 ENVIRONMENTAL SETTING

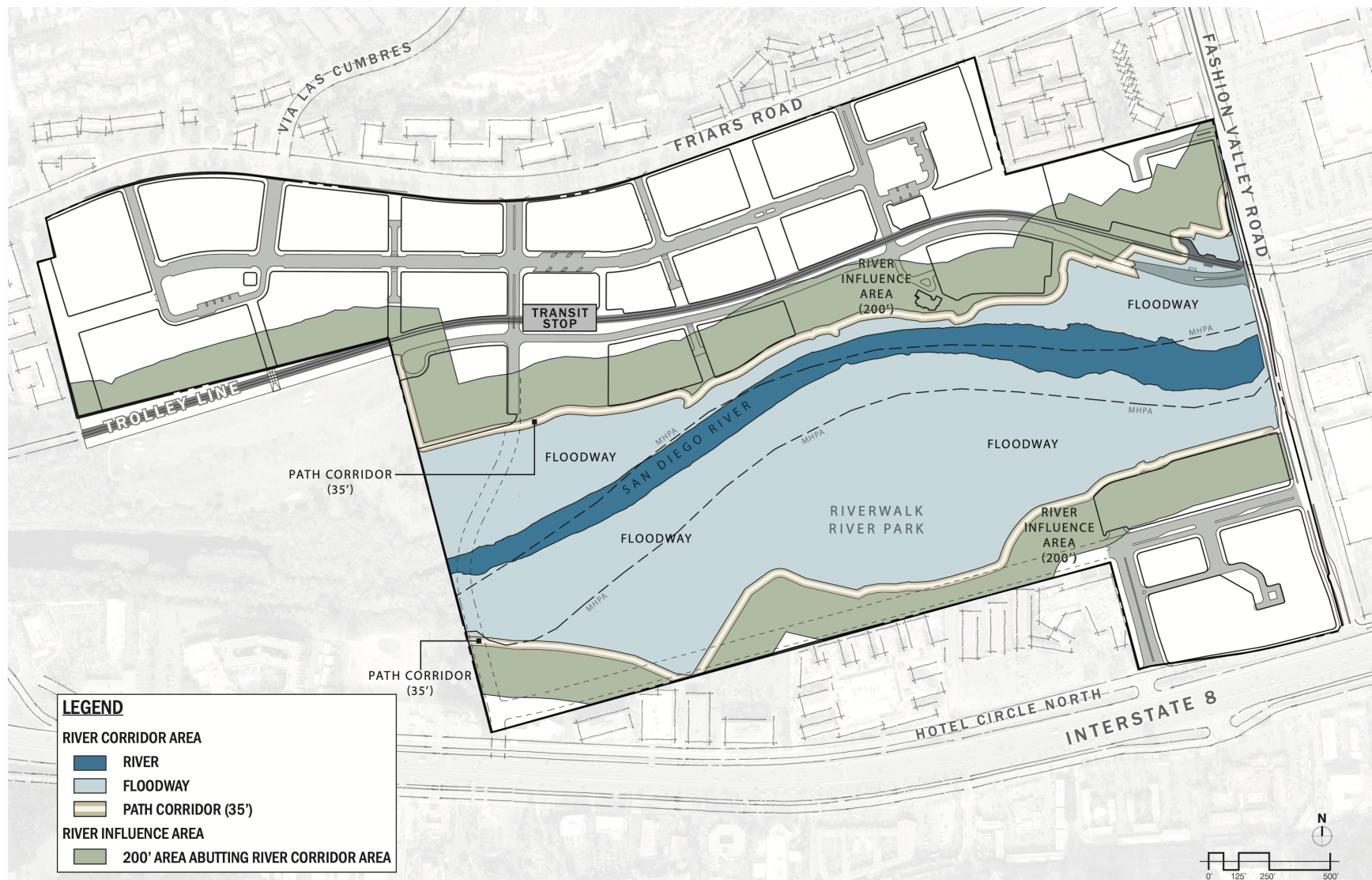


Figure 2-12. San Diego River Park Master Plan within the Riverwalk Specific Plan Area



Figure 2-13. MHPA Exhibit

3.0 PROJECT DESCRIPTION

3.1 Purpose and Objectives of the Project

3.1.1 Project Purpose

The purpose of the Riverwalk Specific Plan is to create a mixed-use, transit-oriented neighborhood on the approximately 195-acre site comprised of four districts. Land uses within the Specific Plan would include parks and open space, multi-family residential, commercial retail, and office and non-retail commercial situated within an urban setting.

3.1.2 Project Objectives

The project objectives associated with the Riverwalk Specific Plan and related actions are:

- Create a focused long-range plan intended to promote increased residential density and employment opportunities consistent with the General Plan, Mission Valley Community Plan, San Diego River Park Master Plan, and the Climate Action Plan.
- Assist the City's housing supply needs by providing a range of housing, including both market rate and deed-restricted affordable units, proximate to transit, jobs, amenities, and services.
- Implement the City of Villages goals and smart growth principles by creating a mixed-use neighborhood with housing, commercial, employment, and recreation opportunities along transit while restoring a stretch of the San Diego River.
- Create a transit-accessible mixed-use development in a central, in-fill location.
- Promote multi-modal travel (pedestrian and bicycle friendly corridors) through the project site through on-site trails, paths, and sidewalks that connect to internal and adjacent amenities and services throughout Mission Valley.
- Construct a new Green Line Trolley stop easily accessible from within Riverwalk and to adjacent surrounding residential and employment areas.
- Design a neighborhood that integrates the San Diego River through active and passive park uses, trails, resource-based and a connected open space.
- Allow for the establishment and creation of a habitat Mitigation Bank that provides long-term habitat conservation and maintenance.
- Improve the Fashion Valley Road crossing that:
 - Provides expanded storm water flow volume accommodating a 10- to 15-year storm event;
 - Improves emergency response times by facilitating north-south vehicular access in storm events; and

- Expands active transportation circulation by providing sidewalks and a buffered two-way cycle track.
 - Modernizes flood control gate operations in the project vicinity.
- Celebrate and interpret important cultural and historic resources within the Specific Plan area.

3.2 Riverwalk Specific Plan

The Riverwalk Specific Plan, included in Appendix CC, establishes goals and policies for a transit-oriented development (TOD) with a range of land uses in a mixed-use setting. The Riverwalk Specific Plan also establishes development standards and architectural guidelines for build-out of the plan area. The intent of the design guidelines and development standards identified for Riverwalk as presented in the Riverwalk Specific Plan is to provide a methodology to achieve the development of a cohesive neighborhood of districts. Additionally, the Riverwalk Specific Plan includes individual district guidelines to identify specific design considerations and special treatment areas unique to each district.

Figure 3-1, *Riverwalk Land Use Map*, shows the types and locations of land uses proposed for the Riverwalk Specific Plan area. The following are the various Specific Plan components.

3.2.1 Land Use Plan

Riverwalk is planned as an integrated, mixed-use neighborhood. As shown in Table 3-1, *Riverwalk Land Uses, Zones, and Development Intensity/Density*, Riverwalk would provide approximately 97 acres of parks, open space, and trails; 4,300 residential units offered as a variety of “for sale” and/or “for rent”, including 10 percent deed-restricted affordable housing built on-site; 152,000 square feet of commercial retail space; and 1,000,000 square feet of office and non-retail commercial use.

3.2.2 Planning Districts

The Riverwalk Specific Plan area is divided into four districts: the North District, the Central District, the South District, and the Park District, as shown in Figure 3-2, *Riverwalk Districts*. The North District would be located between Friars Road and the MTS Green Line trolley tracks. The Central District would be located south of the North District and the MTS Green Line trolley tracks. The South District would be located in the southeast corner of the project site, fronting Hotel Circle North and Fashion Valley Road. The Park District would encompass Riverwalk’s expansive river park (known as the Riverwalk River Park) that flanks the San Diego River and would be located generally between the Central District and the South District. The following provides a description of Riverwalk’s districts.

Table 3-1. Riverwalk Land Uses, Zones, and Development Intensity/Density

Land Use	Allowable Zone(s) ¹	Acreage (acres) ²	Targeted Development Density / Intensity
North District			
Mixed-Use	RM-4-10 CC-3-9	44.3	3,415 units Residential 110,300 square feet Commercial Retail 65,000 square feet Office and Non-retail Commercial
Private Parks	RM-4-10 CC-3-9	10.2	10.2 acres Parks ⁴ and Open Space
Central District			
Mixed-Use	CC-3-9	10.4	885 units Residential 13,100 square feet Commercial Retail
Public Parks	CC-3-9	5.5	5.5 acres Parks ⁴ and Open Space
Private Parks & Open Space	CC-3-9	1.5	1.5 acres Parks ⁴ and Open Space
South District			
Mixed-Use	CC-3-9	11.0	28,600 square feet Commercial Retail 935,000 square feet Office and Non-retail Commercial
Park District			
Public Parks	OP-1-1	45.6 ³	45.6 acres Parks ⁴
MHPA/River Channel/No Use Buffer	OC-1-1	34.6 ³	34.6 acres Open Space
Roadways			
Public Streets	RM-4-10	27.8	N/A
Private Driveways	CC-3-9	3.7	N/A
Street J Irrevocable Offer to Dedicate Right-of-Way	CC-3-9	1.8	N/A
Street U Irrevocable Offer to Dedicate Right-of-Way	OP-1-1 OC-1-1	6.1	N/A
Overall Targeted Project Density / Intensity	RM-4-10 CC-3-9 OP-1-1 OC-1-1	195.0	4,300 units Residential 152,000 square feet Commercial Retail 1,000,000 square feet Office and Non-retail Commercial 97 acres of Parks and Open Space

¹ Unless otherwise approved as a deviation from the base zone, all developments shall comply with the base zone and supplemental development regulations as specified in the City's LDC Sections 143.0410, 143.0420, and 143.0460 (effective February 28, 2018), as modified by Riverwalk Specific Plan Tables 6-1, E-2, E-3, E-4, and E-5.

² Table acreages are approximate and may vary as final mapping for specific development areas occurs. Acreages may not add due to rounding.

³ Calculations include acreage for IODs for extensions of future public Streets 'J' and 'U'. Should these roads not be constructed, resulting acreage of Public Park and MHPA/River Channel/No Use Buffer are estimated to be 52.7 and 40.0 acres, respectively.

⁴ Public and Private Parks may include retail ancillary to the primary park use, such as pushcarts, food trucks, concession stands, consistent with the Park GDP processed with the Riverwalk project.

3.2.2.1 North District

The North District encompasses approximately 68.2 acres between Friars Road and the Green Line Trolley tracks. This district would provide the primary mixed-use core for Riverwalk and is the location of much of Specific Plan's residential development. To achieve the residential and mixed-use focus of the North District, land uses include residential, commercial retail, office and non-retail commercial, and parks and open space. Zoning in the North District would be RM-4-10 for the residentially-focused areas and CC-3-9 for the mixed-use core of the district and the area adjacent to the Fashion Valley Mall.

Supportive retail services and employment amenities would establish this district's mixed-use core. The North District would also provide a focal node of the trolley stop and mobility hub, located in the approximate center of the district. Included at this location would be a central plaza within the mixed-use core that would provide retail, employment, and residential use within proximity to the trolley, Riverwalk River Park, and associated pedestrian walkway amenities. Development in the North District would be centered along an east-west internal spine street (Streets 'D1', 'D2, ' and 'E') (which would be anchored by parks on the east and west ends) that acts as a promenade for pedestrians, bicyclists, and vehicles with connections to Friars Road.

3.2.2.2 Central District

The Central District encompasses approximately 22.3 acres south of the North District, between the trolley tracks and the San Diego River, and would include a mixture of open space and urban land uses. Land uses in this district would be residential, commercial retail, and parks and open space. Zoning in the Central District would be CC-3-9. Interspersed with public parks in the west and east portions of this District, a mix of residential and commercial uses would occur within the central portion of the Central District. The former golf course clubhouse would be re-purposed as a restaurant and amenity space, perhaps with a banquet hall and other private dining options or even a small brewing facility.

The Central District interfaces with the North District at the two trolley crossings (one at-grade, one grade-separated), as well as at the pedestrian/bicycle tunnel that runs under the existing trolley tracks. The Central District also interfaces with the Park District at the southern boundary. Additional connectivity is provided between the Central District and the South District, to the south, via two existing pedestrian/bicycle bridges within the Park District.

3.2.2.3 South District

The southernmost district of Riverwalk is the South District, which comprises the approximately 15.9-acre area south of the Riverwalk River Park. Land uses within the South District would be commercial retail and office and non-retail commercial; applicable zoning would be CC-3-9.

Residential use may also occur here. The South District is envisioned to develop with an employment focus, which may occur as individual buildings or as a more integrated campus-like development. The location of the employment component of the project in this district provides convenient access to transit both on-site and at Fashion Valley Transit Center, the regional transportation network via the I-8 freeway, and a variety of uses provided on-site and in surrounding developments, which include commercial retail, residential, and hospitality uses that have a synergistic relationship to Riverwalk and its employment uses.

3.2.2.4 Park District

The Park District would develop parks and open space land uses within the OP-1-1 and OC-1-1 zones. The approximately 88.0-acre Park District is comprised of the Riverwalk River Park (45.0 acres), river habitat restoration area (34.6 acres), irrevocable offers of dedication (IODs) for future streets 'J' and 'U' (7.7 acres), and the easement for Fashion Valley Road (0.6 acre). Provision and implementation of the Riverwalk River Park is a major element of the Riverwalk Specific Plan that would serve the Specific Plan area and the surrounding communities as a passive and active recreational area. Passive areas are located closer to the river, while active use would be located away from the river to limit impacts such as noise, litter, and unauthorized access. The passive areas include a no-use wetland buffer and riparian restoration area with habitat, natural open space (with some portions located within the MHPA), and nature viewing areas.

3.2.3 Parks, Open Space, Trails, and the Pedestrian Realm

Riverwalk would provide approximately 97 acres of parks, open space (including the San Diego River channel, portions of MHPA areas, no-use buffer, and mitigation bank, described below), and trails as part of the parks and open space network for the project (see Figure 3-3, *Conceptual Park Systems Plan*). These project elements are described below.

3.2.3.1 Parks

Riverwalk's parks would include active and passive uses. The types of parks contemplated in the Riverwalk Specific Plan include Pocket Parks, Mini Parks, Neighborhood Parks, and the Riverwalk River Park.

Riverwalk River Park

The Riverwalk River Park would include passive and active park components. The park would be a daytime use (dawn to dusk) facility and would not include significant nighttime lighting. Additionally, landscaping would include native species that are appropriate within/adjacent to wetland/riverine habitats.

The Riverwalk River Park would be delivered in phases. The first phase would include opening up the existing golf course as a passive park in a form substantially similar to current conditions. When development of the Central District or South District occurs, the site would be graded and active amenities would be constructed in the Central District park areas, with passive park space remaining south of the San Diego River (phase two). Phase three of the Riverwalk River Park would include full build-out of amenities and active recreation areas in the River Park District. The designs of each phase will be decided through a GDP process consistent with Council Policy 600-33.

At full build-out, the active park portion of the Riverwalk River Park would encompass 45.6 acres and is located between 50 and 550 feet from the San Diego River channel and the MHPA. Anticipated uses within the active park may include sports fields, picnic areas, fenced dog parks, playgrounds, water features, a ranger station, a recreation center, restroom facilities, amphitheater, walking/jogging/biking paths and trails, and other amenities. The passive park component of the Riverwalk River Park is located adjacent to the MHPA and the San Diego River channel. Uses in this area would include walking/hiking trails and nature observation nodes with educational kiosks. The Riverwalk River Park also proposes a 50-foot wide no-use buffer flanking the San Diego River channel and MHPA. The no-use buffer, the MHPA, and the San Diego River channel together encompass approximately 34.6 acres within the Riverwalk River Park.

Urban Parks

The urban park network of Riverwalk would serve as a link to boost alternative transportation, as a means for pedestrians, bicyclists, scooter riders, and others to circulate in a non-motorized manner. Urban parks planned by the Riverwalk Specific Plan include linear parks, pocket parks, mini parks, plazas, paseos, and special activity parks (such as a community garden or off-leash dog area).

3.2.3.2 San Diego River Corridor

Within the Riverwalk Specific Plan, the San Diego River provides an urban open space corridor where the river's biology and hydrology can be managed in a natural environment. Immediately north and south of the San Diego River corridor, the project provides passive recreational opportunities for Riverwalk and the San Diego region. The project includes a habitat restoration effort along the existing river channel and within the MHPA on-site to comply with Guideline B15 in the City's MSCP Subarea Plan, which requires the restoration of native vegetation along this portion of the San Diego River Corridor as a condition of development proposals.

The restoration would include the removal of invasive, non-native plant species and the planting of native seed and container stock. The restoration is intended to increase and enhance the native habitats along the San Diego River, within and adjacent to the MHPA. A Wetland Restoration Plan has been prepared to guide the restoration effort and is further discussed in Section 5.4, *Biological Resources*.

3.2.3.3 Mitigation Bank

Riverwalk includes restoration that is intended to create and enhance the native habitats along the San Diego River, within and adjacent to the MHPA consistent with Guideline B15 in the City's MSCP Subarea Plan, which requires the restoration of native vegetation along this portion of the San Diego River channel as a condition of development proposals. The restoration area includes 11.54 acres of wetland habitat enhancement and 13.32 acres of wetland habitat creation. While the mitigation bank use is disclosed in this EIR, the permitting and approvals for the mitigation bank are not included as part of the project.

3.2.3.4 50-foot No Use Buffer

The project includes a 50-foot no use buffer adjacent to the MHPA. Boulders or deterrent vegetation, as well as peeler log fencing, would be installed to deter entrance into the 50-foot no use buffer around the MHPA. Two access points for emergency vehicles would be located immediately adjacent to the existing pedestrian/golf cart bridges. These access points would be available only to emergency personnel in the event of an emergency.

3.2.3.5 Riverwalk's Trails Network

Trails would be provided throughout the Riverwalk River Park, located in the central portion of the site, with connections through smaller park elements and tie-ins to the pedestrian network within the street system and other developed portions of the site. Additionally, a portion of the San Diego River Pathway would be developed through the project site on the north side of the river (see Figure 3-4, *Pedestrian Circulation*).

3.2.3.6 Landscape Treatments

Landscape design for Riverwalk would provide for a well-maintained and organized appearance in areas not covered by buildings or parking, enhance and preserve existing site character, minimize adverse visual and environmental affects, and promote water conservation. Additionally, the provision of tree-lined streets, parks, and other public areas allows the Riverwalk landscape plan to contribute to the City's Climate Action Plan implementation and urban forestry goals, reduce urban heat island effect, and aid in carbon sequestration. The *Conceptual Landscape Plan* (Figure 3-5) illustrates the recommendations for the most visible areas of Riverwalk. The Riverwalk Specific Plan contains landscape discussion relative to streetscape, street yard landscaping, remaining yard landscaping, vehicular use area, open areas, bioswales, erosion control, and culturally significant species and interpretive signage.

3.2.4 Transportation and Circulation

3.2.4.1 Pedestrian Circulation

As shown in Figure 3-4, *Pedestrian Circulation*, the project proposes a variety of pedestrian trails, walkways, and linkages, with pedestrian crossings strategically located throughout Riverwalk. Riverwalk's streets incorporate elements that prioritize pedestrian travel and encourage non-vehicular movement. Riverwalk's public roads and private driveways include sidewalks that would connect to the community-wide pedestrian network. The project would construct a portion of the multi-modal San Diego River Pathway located on the north side of the San Diego River that would connect with pedestrian elements (sidewalks and/or paths) within the districts to the north and south, as well as to off-site sidewalks, where possible, providing connectivity to surrounding developments. The two existing golf cart tunnels are envisioned to be utilized for pedestrian/bicycle access from the north to the south side of the trolley tracks. The easterly tunnel is located entirely within the Riverwalk Specific Plan area and would be integrated into the pedestrian circulation network; MTS controls the land located south of the westerly tunnel. Although there is a potential integration of this tunnel into the future circulation in the Specific Plan area, the Riverwalk Specific cannot dictate activities on MTS land.

Two existing golf cart bridges that span the river would be converted to pedestrian bridges for pedestrian and bicycle use. The travel way of the pedestrian bridges is approximately 11 feet in width. Paths would connect the pedestrian bridges to the pedestrian trails, the various elements of the park system, and pedestrian/bicycle linkages to the development areas on both sides of the San Diego River. The project proposes to construct an additional pedestrian bridge over the 'J' Street undercrossing to serve the proposed trolley station/transit stop. The pedestrian path that runs along the north side of the MTS trolley tracks would allow uninterrupted pedestrian circulation using this pedestrian bridge over the vehicular undercrossing at 'J' Street as part of the trolley stop/transit stop. This bridge would be physically separated from the bridge structure that supports the trolley tracks.

3.2.4.2 Bicycle Circulation

The project proposes bicycle facilities along roadways and trails within Riverwalk (see Figure 3-6, *Bicycle Circulation Plan*). Bicycle travel would be promoted with interconnected on-street and off-street facilities, such as bike lanes, cycle tracks, and multi-modal pathways. Riverwalk's streets contain elements that prioritize bicycle travel and encourage non-vehicular movement. The project would construct a continuous 14-foot-wide Class I multi-modal San Diego River Pathway located on the north side of the San Diego River to accommodate bicyclists and connect with other bicycle facilities within Riverwalk, as well as to the community-wide bicycle network. Where the San Diego River Pathway would be adjacent to Riverwalk Drive, it would be constructed with a minimum 10-foot-wide concrete (or similar material) pathway within a minimum two-foot-wide decomposed

granite (or similar material) shoulder on either side of the pathway. Where the San Diego River Pathway would be constructed not adjacent to Riverwalk Drive, the pathway would be constructed with a minimum 14-foot-wide concrete pathway. As mentioned previously, the bicycle network would also utilize the existing golf cart bridges (once converted to multi-modal bridges) to cross the San Diego River. The bicycle network consists of the following facilities:

- Class I bicycle paths are facilities separate from roadways used for two-way bicycle travel, which will be provided on the east and west side of the site and throughout the Riverwalk River Park.
- Bicycle paths are proposed on either side of the San Diego River to connect the development areas of Riverwalk to the Riverwalk River Park open space areas via existing bridges.
- Class II bicycle lanes would be provided on all public streets throughout Riverwalk, with the exception of Streets A and K, where dedicated Class I bicycle facilities are provided nearby.
- Class IV two-way cycle track facilities are proposed for fronting portions of Friars Road, Fashion Valley Road, and Hotel Circle North, as well as Street 'U'.
- The existing Friars Road Class IV two-way cycle-track will provide access to the Riverwalk site at multiple locations, including all signalized intersections.
- All other Private Driveways within Riverwalk would be Class III Bike Routes that are signed "bikeways" and shared with motor vehicles with no specially marked lane.

3.2.4.3 Light Rail Transit

As part of the Riverwalk project, a new Green Line Trolley stop would be constructed in the central portion of the North and Central Districts, providing expanded transit access to Riverwalk residents, employees, and visitors, as well as members of the surrounding communities. (See Figure 3-7, *Existing Green Line Trolley Network and Proposed Trolley Stop*.) A mobility hub with multi-modal transportation amenities, such as bicycle lockers/racks and rentals, and alternatives, such as drop-off/pick-up and rideshare, would be located at the transit stop.

3.2.4.4 Vehicular Circulation

The Riverwalk Specific Plan proposes a roadway network comprised of public streets and private drives to facilitate vehicular traffic within and through the project. Riverwalk Drive would be constructed through the project site, tying together the various planned land uses in the North and Central Districts. Riverwalk Drive would connect Fashion Valley Road on the east to project features in the west-central portion of the project. In addition to Riverwalk Drive, the Riverwalk project would construct an interconnected grid of public streets and private drives to provide for pedestrian, bicycle, and vehicular access within the various districts of Riverwalk. The proposed streets have been designed in accordance with City regulations and would accommodate fire and emergency vehicles.

The project has been generally designed with a grid street pattern. Figure 3-8, *Vehicular Circulation Plan*, depicts the vehicular circulation plan proposed for Riverwalk and designate the classification of roads designed to serve development within the Specific Plan. A description of all proposed streets within Riverwalk is included in Section 4.6, *Specific Plan Street System*, of the Specific Plan.

Implementation of the Riverwalk Specific Plan would result in modifications to surrounding roadways, as described below.

Friars Road

With implementation of the Riverwalk project, Friars Road would be modified in the eastbound direction to include two 11-foot drive lanes, a four-foot-wide bike lane with two-foot buffers on either side, an eight-foot-wide two-way cycle track, and a 17-foot-wide landscaped parkway that buffers a six-foot-wide non-contiguous sidewalk. A 14-foot-wide planted median with turn lane would separate the travel lanes and ultimate right-of-way would be 122 feet. The existing cycle track would transition to a Class II bike lane approximately 900 feet west of Fashion Valley Road.

Fashion Valley Road

With implementation of the Riverwalk project, Fashion Valley Road would be modified to include two 11-foot travel lanes in either direction, separated by a 24-foot-wide planted median with turn lanes. A two-way, 12-foot Class IV two-way cycle track would be constructed on the west side of the roadway, with a four-foot buffer between the cycle track and the travel way. (Riverwalk would develop the Class IV two-way cycle track along Fashion Valley Road from Hotel Circle North to Riverwalk Drive. The existing shared bike situation along Fashion Valley Road from Riverwalk Drive to Friars Road would be converted to a Class IV two-way cycle track when redevelopment north of the Riverwalk property allows for a continuous Class IV cycle track.) To the west of the cycle track, a nine-foot landscaped parkway buffers a six-foot non-contiguous sidewalk. On the east side of the roadway, the existing five-foot contiguous sidewalk would remain. Riverwalk would raise Fashion Valley Road to accommodate 10- to 15-year storm event and provide a soft-bottom condition for the San Diego River. Right-of-way width would be increased to 110 feet.

The Riverwalk project would not be responsible for off-site improvements of Fashion Valley Road north of the property line between Private Drive 'T' and Friars Road. The Riverwalk project has been designed to accommodate a future extension of the two-way cycle track north of Riverwalk Drive; this improvement would occur concurrently with future action to extend the widening of Fashion Valley Road north of the Riverwalk property line.

In conjunction with the improvements to Fashion Valley Road, the project would install automated gates adjacent to the road to restrict traffic when the river reaches the level at which it crosses over the roadway. The gates would be connected to sensors in the river, which would measure the water level and would trigger the gates to close Fashion Valley Road to traffic, across the culvert, in a north and south direction.

Hotel Circle North

Hotel Circle North's classification was changed with the Mission Valley Community Plan to become a one-way street with two westbound travel lanes, a two-way cycle track, and a non-contiguous sidewalk. To implement these improvements, Riverwalk would widen the north side of the road by approximately 10 feet along the project frontage.

3.2.5 Public Services, Utilities, and Safety

3.2.5.1 Public Services

Public services are those institutional responses to basic human needs, such as health, safety, welfare, and education. This section describes the provisions necessary for public services, including schools, libraries, fire and police, solid waste, and public parks and recreation. Public service needs are based on an area's population. The buildout population for Riverwalk is estimated at 7,955, based on the target residential development of 4,300 dwelling units and a population generation rate of 1.85 people per residence provided by City of San Diego Park planning staff.

3.2.5.2 Public Utilities

The project is located within an urbanized area in the Mission Valley community. As such, water and sewer facilities have been installed to serve existing on-site uses and adjacent areas.

The project would require new waterlines and connections to the City water system as represented in Figure 5.13-2, *Proposed Water System Modifications*, of this EIR. The proposed on-site water system would be provided through multiple connections to the existing water system and would accommodate the Specific Plan's demand. The proposed 16-inch diameter northern loop would have four connections to the existing 16-inch diameter main in Friars Road and one connection to the existing 16-inch diameter main on Fashion Valley Road. The proposed 12-inch diameter southern loop would have one connection to the existing 16-inch main in Fashion Valley Road and one connection to the existing eight-inch water main in Hotel Circle North. Domestic water would be provided for each lot off the proposed public mains with metered connections, back flow prevention, and private service mains.

To allow for four independent sewer systems, the project proposes four points of connections (POC) to the existing sewer system as shown in Figure 5.13-3, *Proposed Sewer System*, of this EIR. The first POC would connect to the northern unused off-site 15-inch line stub out near the western portion of the project site. Upstream of POC 1 are proposed public 12-inch and 10-inch sewer lines that make up the first sewer system. POC 2 would connect to the off-site 24-inch line in Fashion Valley Road. Upstream of POC 2 are proposed 10-inch sewer lines that make up the second sewer system. POC 3 would connect to the southern unused off-site 15-inch line stub out near the western portion of the project site. Upstream of POC 3 are proposed 10-inch sewer lines that make up the third sewer

system. POC 4 would connect to the 78-inch North Mission Valley Trunk Sewer in an off-site existing manhole in Fashion Valley Road. Ten-inch sewer lines upstream of POC 4 make up the fourth sewer system. The project's sewer system has been designed in conformance with the City's Sewer Design Guide.

A dual storm drain system would be constructed on-site to provide for storm water drainage and control. One system would primarily convey storm runoff from the development pads, while the other would primarily convey street and runoff from adjacent areas to the San Diego River. The off-site runoff would not commingle with the on-site runoff until the on-site runoff is treated. The project runoff would be treated by biofiltration basins or compact biofiltration BMPs (e.g., Modular Wetland System Linear or equivalent) before discharging towards the San Diego River.

Construction of water, sewer, and storm water facilities to serve the project would be subject to standard industry measures and the SDMC and would be a part of the project's proposed grading and construction plans.

3.2.5.3 Public Safety

Within Mission Valley, these include compatibility with the airports within whose influence areas a site is located, as well as emergency evacuation in the event of such natural disasters as flooding or wildfire. The Riverwalk Specific Plan provides a general discussion of public safety relative to airport land use compatibility, emergency evacuation, flood control measures, and wildfire hazards.

The Landscape Regulations require brush management review on properties mapped within the Very High Fire Hazard Severity Zone (VHFHSZ) where habitable structures are located within 100 feet of areas with native and naturalized vegetation. Although this zone is mapped along the San Diego River which traverses the site, most structures within the project would be sited over 79 feet from the native/naturalized condition. In Lots 36 through 40 where development may be less than 79 feet from this wildland-urban interface, a modified Zone One would be implemented. The Zone One would consist of areas within the development footprint such as setbacks and developed fire breaks, in addition to alternative compliance measures to provide the equivalency of a full brush management defensible space program.

3.2.6 Land Uses, Development Standards, and Design Guidelines

Chapter 6, *Land Uses, Development Standards, and Design Guidelines*, of the Riverwalk Specific Plan provides guidance on the permitted and regulated land uses within the Specific Plan area, as well as policies to guide development. Design objectives are presented in this chapter, as well as general design themes and general site planning and architectural guidelines. Policies relative to architectural foundation are presented, which pertain to site planning, materials and treatments, form and scale, building style and massing guidelines, and activated interfaces. Specific Plan area-

wide policies and development regulations, including Tailored Development Standards, are provided for such areas as floor/area ratio; setbacks; parking; mechanical and utility equipment screening; outdoor storage, refuse/recyclable, and loading areas; private open space; temporary/interim uses; monumentation and signage; fencing and walls; outdoor lighting; landscape features; transportation features; sustainable features; universal design; River Corridor Area; and River Influence Area.

District-specific guidelines are also included in this chapter, as well as district-specific development regulations. District-specific design guidance is intended to supplement the criteria located throughout the Riverwalk Specific Plan. These guidelines would be considered in conjunction with the zoning regulations and development standards of the zone designated for each district. District-specific guidelines also address special edge treatments at sensitive interfaces, such as the Friars Road interface, The Courtyard community interface, Mission Greens community interface, Fashion Valley Road interface, Trolley interface, Riverwalk River Park interface, Development interface south of the San Diego River, and Freeway interface.

3.2.7 Implementation

Implementation of the Riverwalk Specific Plan would be aided by the tables provided in Appendix E, *Development Standards*, of the Specific Plan. Table E-1, *Riverwalk Specific Plan Development Standards – Regulations*, includes Specific Plan area-wide regulations to be implemented with development. Tables E-2 through E-4 provide the zoning and development regulations for each district, as modified by the Specific Plan. Table E-5, *Riverwalk Tailored Development Standards*, provide Riverwalk-specific development standards, which are applied to specific lots, districts, zones, or the project as a whole. (Riverwalk’s Tailored Development Standards are analyzed in Section 5.1, *Land Use*.)

The Implementation chapter of the Riverwalk Specific Plan (Chapter 7) addresses development intensity, zones, phasing, implementation procedures (development project review process), affordable housing, lot reconfiguration/consolidation, financing strategies, and maintenance responsibilities. Together, phasing and implementation are intended to ensure that roadways and infrastructure are in place commensurate with the Transportation Improvement Plan and that build out of Riverwalk is in accordance with the objectives, guidelines, and regulations of the Specific Plan. Maintenance responsibilities are proposed so that common and public areas are appropriately maintained.

The Specific Plan provides for development of Riverwalk in three phases that are anticipated to occur over a period of approximately 10 to 15 years. The proposed Phasing Plan for Riverwalk is shown in Figure 3-10, *Riverwalk Phasing Plan*. Table 3-2, *Riverwalk Phasing Summary Table*, summarizes development in each of the phases. The Specific Plan does not require that phases occur in any special order. Phasing may occur in any order and more than one phase may occur at one time, provided that the necessary on-site and off-site infrastructure is in place or occurs concurrently as specified in each phase(s) of development. The maximum development intensity

allowed in Riverwalk is shown in Table 3-1, *Riverwalk Land Uses, Zones, and Development Intensity/Density*.

Table 3-2. Riverwalk Phasing Summary Table

Phase	Year	Development
I	2025	<ul style="list-style-type: none">» 1,910 multi-family dwelling units» 110,300 square feet commercial retail» 65,000 square feet non-retail commercial (multi-tenant office)» 1.6 acres developed park» 3.11 acres undeveloped park
II	2030	<ul style="list-style-type: none">» 2,390 multi-family dwelling units» 13,100 square feet commercial retail» Construction of Riverwalk transit stop» 26.27 acres developed park» 53.48 acres undeveloped park (including the Riverwalk River Park)
III	2035	<ul style="list-style-type: none">» 28,600 square feet commercial retail» 935,000 square feet non-retail commercial (multi-tenant office)» 2.2 acres undeveloped park

Future construction and development permits for projects within the Riverwalk Specific Plan would be acted upon in accordance with decision processes established in Section 7.3, *Development Project Review*, of the Specific Plan. Projects that propose to change the Overall Project Density/Intensity would require additional CEQA review as described in Chapter 7 of the Specific Plan.

3.3 Frontage and Off-site Improvements

3.3.1 Frontage Pedestrian Improvements

The project proposes to construct the following pedestrian improvements on the fronting streets:

- The project would construct a six-foot-wide non-contiguous sidewalk along the entire project frontage on the south side of Friars Road. The sidewalk would be separated by a 17-foot-wide landscaped buffer to provide refuge for pedestrians.
- Currently, a five-foot-wide contiguous sidewalk exists only on the east side of Fashion Valley Road between Friars Road and Hotel Circle North. An existing five-foot-wide contiguous sidewalk on the west side on Fashion Valley Road is provided for approximately 620 feet between Friars Road and proposed Private Drive 'T'. The project would widen Fashion Valley Road and construct a six-foot-wide non-contiguous sidewalk on the west side of Fashion Valley Road along the entire project frontage between proposed Private Drive 'T' and Hotel

Circle North.

- Currently there are no sidewalks on Riverwalk Drive, west of Fashion Valley Road. The project would construct a seven-foot-wide non-contiguous sidewalk along the south side of Riverwalk Drive between Fashion Valley Road to its on-site terminus. No sidewalk is proposed on the north side, as it is fronting the trolley tracks.
- The project would construct a seven-foot-wide non-contiguous sidewalk along the 840-foot project frontage on the north side of Hotel Circle North. The sidewalk would be separated by a seven-foot-wide landscape buffer to provide refuge for pedestrians.

3.3.2 Frontage Bicycle Improvements

To promote bicycle mobility, the project proposes several bicycle improvements along the major project fronting corridors of Friars Road, Fashion Valley Road, and Hotel Circle North. The following is a brief description of the project bicycle improvements:

- Friars Road – The project would construct a Class IV cycle track on Friars Road between Colusa Street and public Street 'M'. The existing Class II buffered bike lanes on both sides of Friars Road between Colusa Street and 920 feet west of Fashion Valley Road would remain.
- Fashion Valley Road – Consistent with Mission Valley Community Plan Bicycle Plan, the project would construct a two-way Class IV Cycle Track on the west side of Fashion Valley Road between Riverwalk Drive and Hotel Circle North along the project frontage. A southbound Class II bike lane between Private Drive 'T' and Riverwalk Drive would also be provided by the project. A Class III bike route would be designated along southbound Fashion Valley Road for portions that are not along Riverwalk project frontage (which is approximately 660 feet). (Riverwalk would develop the Class IV two-way cycle track along Fashion Valley Road from Hotel Circle North to Riverwalk Drive. An interim Class III bike lane along Fashion Valley Road from Riverwalk Drive to Friars Road will be converted to a Class IV two-way cycle track when redevelopment north of the Riverwalk property allows for a continuous Class IV cycle track.)
- Hotel Circle North – Currently, Hotel Circle North along the project frontage includes no bike lanes. Consistent with the Mission Valley Community Plan Bicycle Plan, the project would provide 10 feet of space for the construction of a two-way Class IV Cycle track on the north side of Hotel Circle between Fashion Valley Road and I-8 WESTBOUND Ramps. This assumes a one-way couplet is implemented on Hotel Circle North and Hotel Circle South per the Mission Valley Community Plan.

3.3.3 Frontage and Off-site Vehicular Improvements

Vehicular frontage and off-site improvements that are necessary to address the project's effects on area roadways would also be constructed with the Riverwalk project. These generally include:

3.0 PROJECT DESCRIPTION

- Friars Road frontage improvements: Public Street 'A' to Fashion Valley Road – Project would install a raised median, curb, gutter, sidewalk, parkway, and two-way cycle track.
- Friars Road/Goshen Street intersection – Project would install a new traffic signal and implement ITS improvements.
- Friars Road: Goshen Street to Public Street 'A' – Project would construct a 14-foot-wide raised landscaped median.
- Friars Road/Via las Cumbres intersection – Project would widen eastbound approach to provide an additional left-turn lane, restripe the southbound approach to provide dual left-turn lanes and shared through right lane, and modify the existing traffic signal to accommodate these changes.
- Fashion Valley Road: Private Drive 'T' to Hotel Circle North – Project would widen to a 4-lane Major with a 24-foot-wide raised landscaped median and a two-way cycle track on the west side.
- Riverwalk Drive/Fashion Valley Road intersection – Project would widen the westbound approach to include an exclusive westbound left-turn lane. Installation of overlap phases on westbound and eastbound right-turn movements. Signal modification is also proposed.
- Hotel Circle North: I-8 Westbound Ramps to Fashion Valley Road – Implementation of the one-way couplet pending the findings of Hotel Circle and I-8 Corridor Circulation Study for one-way couplet and I-8 corridor between SR 163 and Taylor Street.
- Friars Road: Project would install ITS improvements at the following intersections:
 - Seaworld Drive/Friars Road
 - Napa Street/Friars Road
 - Colusa Street/Friars Road
 - Via las Cumbres/Friars Road
 - Fashion Valley Road/Friars Road
- Hotel Circle North/I-8 Westbound Hook Ramps intersection – Project would install a traffic signal pending Caltrans approval and Hotel Circle and I-8 Corridor Circulation Study findings.
- Hotel Circle North and Hotel Circle South Couplet: Project would fully fund Circulation Study for Hotel Circle one-way couplet and I-8 corridor between SR 163 and Taylor Street.
- Fashion Valley Road: Friars Road to Hotel Circle North – Project would install ITS Improvements with Transit Signal Priority as appropriate at the following intersections:
 - Friars Road/Fashion Valley Road
 - Riverwalk Drive/Fashion Valley Road
 - Hotel Circle North/Fashion Valley Road
- Riverwalk Drive/Avenida del Rio intersection – Project would install a new traffic signal subject to available right-of-way.
- Friars Road: Colusa Street to Goshen Street – Project would construct a 14-foot-wide raised landscaped median.
- Hotel Circle Place/Hotel Circle North intersection – Project would install a traffic signal subject to the findings of the Hotel Circle and I-8 Corridor Circulation Study.
- Hotel Circle North/I-8 Westbound Ramps/Taylor Street intersection – Project would restripe the southbound approach to include dual right-turn lanes subject to the findings of the Hotel

Circle and I-8 Corridor Circulation Study.

- Friars Road and Ulric Street/SR 163 SB Ramps intersection – Project would install ITS Improvements with Transit Signal Priority.
- Ulric Street/SR 163 SB On-ramp intersection – Project would install a new traffic signal and ITS Improvements.

3.4 Grading

Grading for the Riverwalk project would result in 176.5 acres of on-site area to be graded (or 90.4 percent of the total project site) (Figure 3-9, *Riverwalk Grading Plan*). Additionally, the project would require a total of 0.65 acre of off-site grading. The amount of remedial grading (alluvium removal and recompaction) would be 1,506,700 cubic yards (cy). The total amount of geometric cut would be 426,400 cy, with a maximum cut depth of 24 feet. The total amount of geometric fill would be 1,454,000 cy, with a maximum fill depth of 32 feet. Grading for the project would require 1,028,000 cy of import.

Construction grading would occur in accordance with the *Riverwalk Phasing Plan* (Figure 3-10). Grading would occur throughout the project site and within the limits of the proposed park to accommodate park uses as well as native vegetation along the river. As described above in Section 3.2.7, *Implementation*, the Specific Plan does not require that development occur in a specific order. The project would be graded in a phased manner restricted by City rules, regulations and ordinances; agency limitations; and the Regional Water Quality Control Board. Phasing may occur in any order, and more than one phase may occur at any time, provided the necessary infrastructure is in place, or occurs concurrently as specified in each phase(s) of development.

3.5 Irrevocable Offers of Dedication

The Mission Valley Community Plan includes two Community Plan Circulation Element Roads within the Riverwalk project site: future public Streets 'J' and 'U' (Figure 3-11, *Irrevocable Offers of Dedication Location Map*). Future public Street 'J' would cross the San Diego River in a north-south direction and is planned to span I-8 to the south, ultimately connecting to Hotel Circle North and South. Future public Street 'U' would run in an east-west fashion between Streets 'J' and 'V' along the southern project site boundary.

The IOD areas would accommodate construction of public Streets 'J' and 'U' through the project site. Funding and timing for these roadways is unknown at this time. Additionally, the applicant for the Riverwalk project is not responsible for construction of the roadways, nor are the roadways part of the project. Design-specific evaluation, including CEQA review, would need to be undertaken when public improvement plans are processed for these roadways. Permits from the City, as well as any permits from other agencies, as applicable, would also need to be obtained at that time.

3.6 Discretionary Actions

For the Riverwalk project, the following discretionary actions are being requested:

3.6.1 Levi-Cushman Specific Plan Rescission

The Levi-Cushman Specific Plan would be rescinded. The Levi-Cushman Specific Plan is made up of two ownerships: a smaller five-acre parcel owned by MTS and a larger 195-acre area owned by Riverwalk. MTS issued a letter in support of this action and consenting to the rescission on March 11, 2020 (see Appendix AA). With rescission, the MTS parcel would be regulated by the Mission Valley Community Plan land use designation and zoning. The Riverwalk Specific Plan would wholly replace the Levi-Cushman Specific Plan for the remaining 195 acres.

3.6.2 Mission Valley Community Plan Amendment

The project includes a Community Plan Amendment to align the Mission Valley Community Plan with the Riverwalk Specific Plan (Appendix DD). This includes revisions to the Planned Land Use map (Figure 4 of the Mission Valley Community Plan) to adjust the overall site boundary and the boundaries of the existing land use designations to be consistent with the Riverwalk Specific Plan and to remove the "To be completed" reference on the Riverwalk Specific Plan area label. Furthermore, the project site will be removed from the CPIOZ map (Figure 39 of the Mission Valley Community Plan), consistent with the proposed Land Development Code amendment, and slight text changes will be made indicating that the specific plans identified in the Specific Plan Subdistrict were adopted prior to the adoption of the current Mission Valley Community Plan.

3.6.3 General Plan Amendment

An amendment to the City's General Plan would also be required due to the amendment to the Mission Valley Community Plan. However, the General Plan text and graphics would not need to be altered.

3.6.4 Land Development Code Amendment

The project would also include an amendment to the LDC related to the Community Plan Implementation Overlay Zone (CPIOZ) to remove the area covered by the Levi-Cushman Specific Plan, which includes the proposed Riverwalk Specific Plan, as well as five acres owned by MTS. Specifically, SDMC, Chapter 13, Article 2, Division 14, Diagram 132-14R would be modified to remove the property as described above. Diagram 132-14R Mission Valley CPIOZ is a reproduction of Map No. C-998, for illustration purposes only.

3.6.5 Riverwalk Specific Plan

Adoption of the Riverwalk Specific Plan.

3.6.6 Rezone

The Riverwalk Specific Plan would require some areas to be rezoned (see Figure 3-12, *Proposed Zoning*). The areas to be rezoned include the park areas located between the San Diego River and Riverwalk Drive (OP-1-1 to CC-3-9) and the area east of Lot 40 and south of Riverwalk Drive (CC-3-9 to OP-1-1).

3.6.7 Vesting Tentative Map

The Riverwalk project includes a Vesting Tentative Map (VTM) to allow for grading and development of the Riverwalk Specific Plan. The VTM provides details relative to grading, street design, and utility layout necessary to implement the land use plan of Riverwalk. Further, the VTM provides for the implementation of residential and commercial condominiums. The VTM proposed for the Riverwalk project is shown in Figure 3-13, *Riverwalk Vesting Tentative Map*.

3.6.8 Site Development Permit

The project site contains areas that are regulated by the City's ESL regulations (LDC Section 143.0100), that include sensitive biological resources and areas mapped as Special Flood Zones. The ESL regulations require a Site Development Permit. In addition, Supplemental Development Findings would also be required for impacts to ESL containing wetlands, as discussed in Section 5.1, *Land Use*, and Section 5.4, *Biological Resources*.

3.6.9 Conditional Use Permit Amendment

The Riverwalk Specific Plan area, as well as a portion of adjacent land, is operated as the Riverwalk Golf Course. A Conditional Use Permit to amend CUP No. 94-0563 would allow for the golf course to remain in operation on the site as the Riverwalk project develops.

3.6.10 Public Right-of-Way and Easement Vacations

Certain public easements and rights-of-way would be vacated as part of the project (Figure 3-14, *Public Right-of-Way and Easement Vacations*). The vacated easements and rights-of-way have been either previously abandoned by the City or are proposed to be relocated in conjunction with the VTM. These easements include public sewer, which runs east-west across the project site roughly between the trolley tracks and Friars Road. Additionally, easements for public sewer, public

drainage, and access for these easements intrude into the site at various locations in the North District from Friars Road.

3.6.11 Park General Development Plan

City Council Policy 600-33 allows for the concurrent processing of a Park General Development Plan for projects that include public park(s). Consistent with City Council Policy 600-33, public workshops have been held to discuss the public parks and their components, which will result in a public park plan that will be presented to the Mission Valley Community Planning Group and the City's Park and Recreation Board, then included in the Riverwalk Specific Plan documents and plans. The Park General Development Plan would be approved by the Park and Recreation Board.

3.6.12 Financing District Formation

Project implementation would include the future formation of various financing districts to fund the maintenance of certain public improvements (e.g. parkland) required in connection with the development of the Riverwalk Specific Plan. The Financing District Formation would require a vote of property owners within the district and ultimate City Council approval.

3.6.13 Public Improvement Agreements

Project implementation includes future construction of public improvements to City standards that require City Council approval.

3.6.14 Development Agreement

A Development Agreement is being processed as part of the Riverwalk project. The purpose of a Development Agreement is to promote and facilitate orderly and planned growth and development through the provision of certainty in the development approval process by the City and through the provision of extraordinary benefits by the developer.

3.7 Other Agency Approvals

As described in Section 1.5, *Responsible and Trustee Agencies*, of this EIR, approval of the following State and Federal permits would be required for the proposed project:

3.7.1 Section 404 Permit from U.S. Army Corps of Engineers

Section 404 of the CWA regulates the discharge of dredged, excavated, or fill material in wetlands, streams, rivers, and other U.S. waters. The USACOE is the Federal agency authorized to issue Section

404 Permits for certain activities conducted in wetlands or other U.S. waters. Because the project involves enhancement of the San Diego River, a 404 Permit would be required.

3.7.2 Federal Emergency Management Agency

A Letter of Map Revision (LOMR) from FEMA to modify the FIRM for the San Diego River would be required. Issuance of the LOMR requires completion of the USACOE Section 404 permit. The 404 permit requires RWQCB Section 401 waiver/certification, which in turn requires a certified EIR. Therefore, LOMR issuance is currently anticipated to follow project approval and EIR certification. Construction of the project with elements located within the floodplain is conditioned upon receipt of all agency permits.

3.7.3 1602 Streambed Alteration Agreement from California Department of Fish and Wildlife

Because the project would affect State jurisdictional area, an application for a CDFW Streambed Alteration Agreement would be submitted following certification of the EIR.

3.7.4 Mitigation Bank Approvals

The project includes establishment of a mitigation bank of surplus habitat created as part of the project. Establishment of the mitigation bank would require approvals from USACOE and CDFW.

3.7.5 Section 401 State Water Quality Certificate from Regional Water Quality Control Board

A project that requires a Federal permit or involves dredge or fill activities that may result in a discharge to U.S. surface waters and/or "Waters of the State" is required to obtain a CWA Section 401 Water Quality Certification and/or Waste Discharge Requirements (Dredge/Fill Projects) from the Regional Water Quality Control Board, verifying that the project activities would comply with State water quality standards. The most common Federal permit for dredge and fill activities is a CWA Section 404 Permit issued by the USACOE (described above). Because the proposed project requires a USACOE CWA Section 404 Permit, the Regional Water Quality Control Board would regulate the project and associated activities through a Water Quality Certification determination (Section 401).

3.7.6 California Public Utilities Commission Approval

As part of implementing a transit-oriented neighborhood, the Riverwalk Specific Plan includes the construction of a new trolley stop/transit station along the east side of public Street 'J' on the existing Green Line Trolley. Additionally, the Riverwalk Specific Plan calls for converting the existing golf cart

tunnels under the existing trolley tracks to pedestrian and bicycle use. The project also includes an at-grade crossing (vehicles, pedestrians, and bicycles) and a new undercrossing under the tracks (see Figure 3-15, *Trolley Crossings*). These features need to be reviewed and approved by the CPUC through applications by the City of San Diego, Transportation and Storm Water Department, and MTS. The applicant has been working with these agencies and will continue to do so through the approval process.

3.0 PROJECT DESCRIPTION



Figure 3-1. Riverwalk Land Use Map

3.0 PROJECT DESCRIPTION

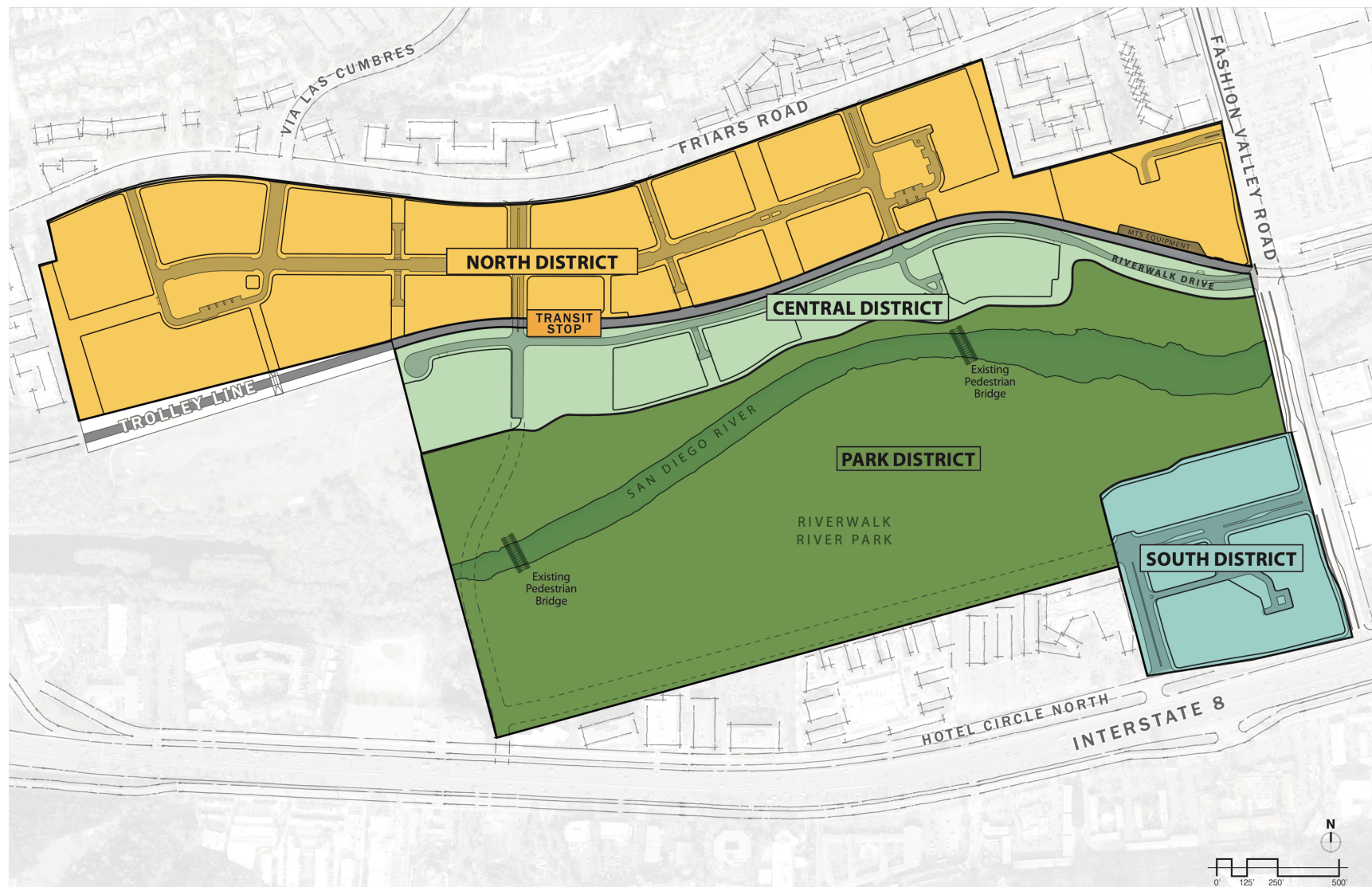
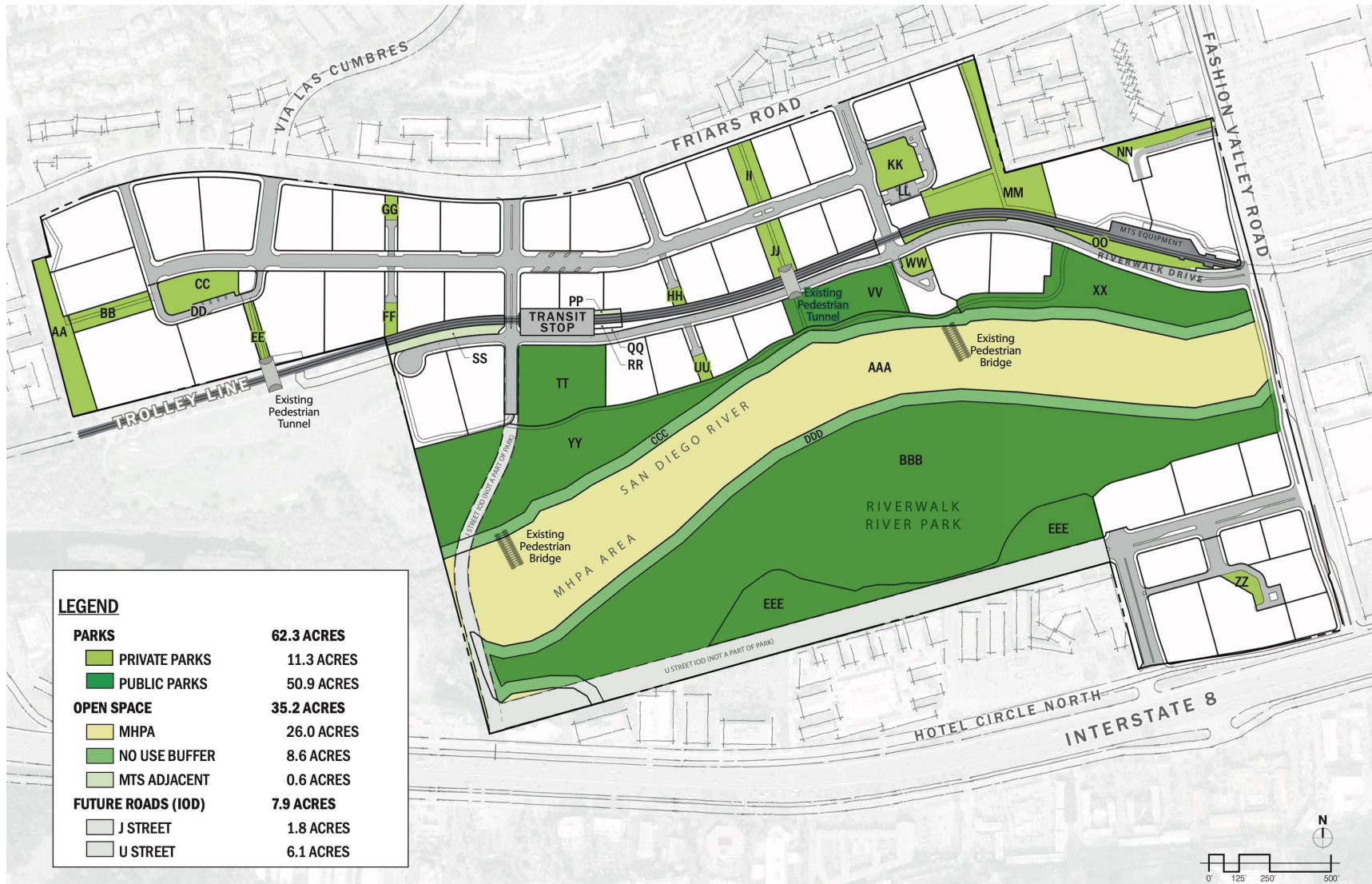


Figure 3-2. Riverwalk Districts

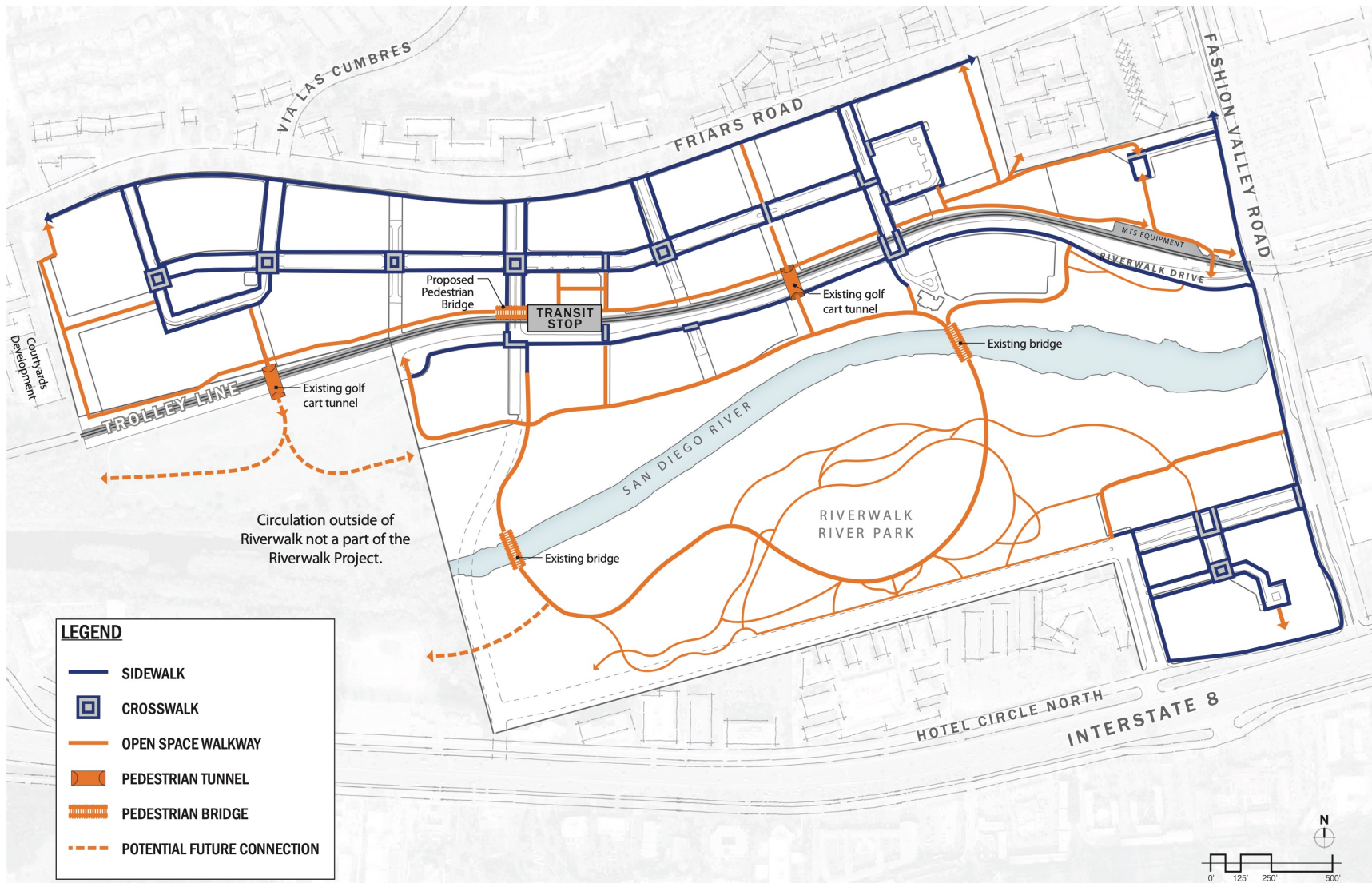
3.0 PROJECT DESCRIPTION



FOR ILLUSTRATIVE CONCEPT PURPOSES ONLY

Figure 3-3. Conceptual Park Systems Plan

3.0 PROJECT DESCRIPTION



FOR ILLUSTRATIVE CONCEPT PURPOSES ONLY

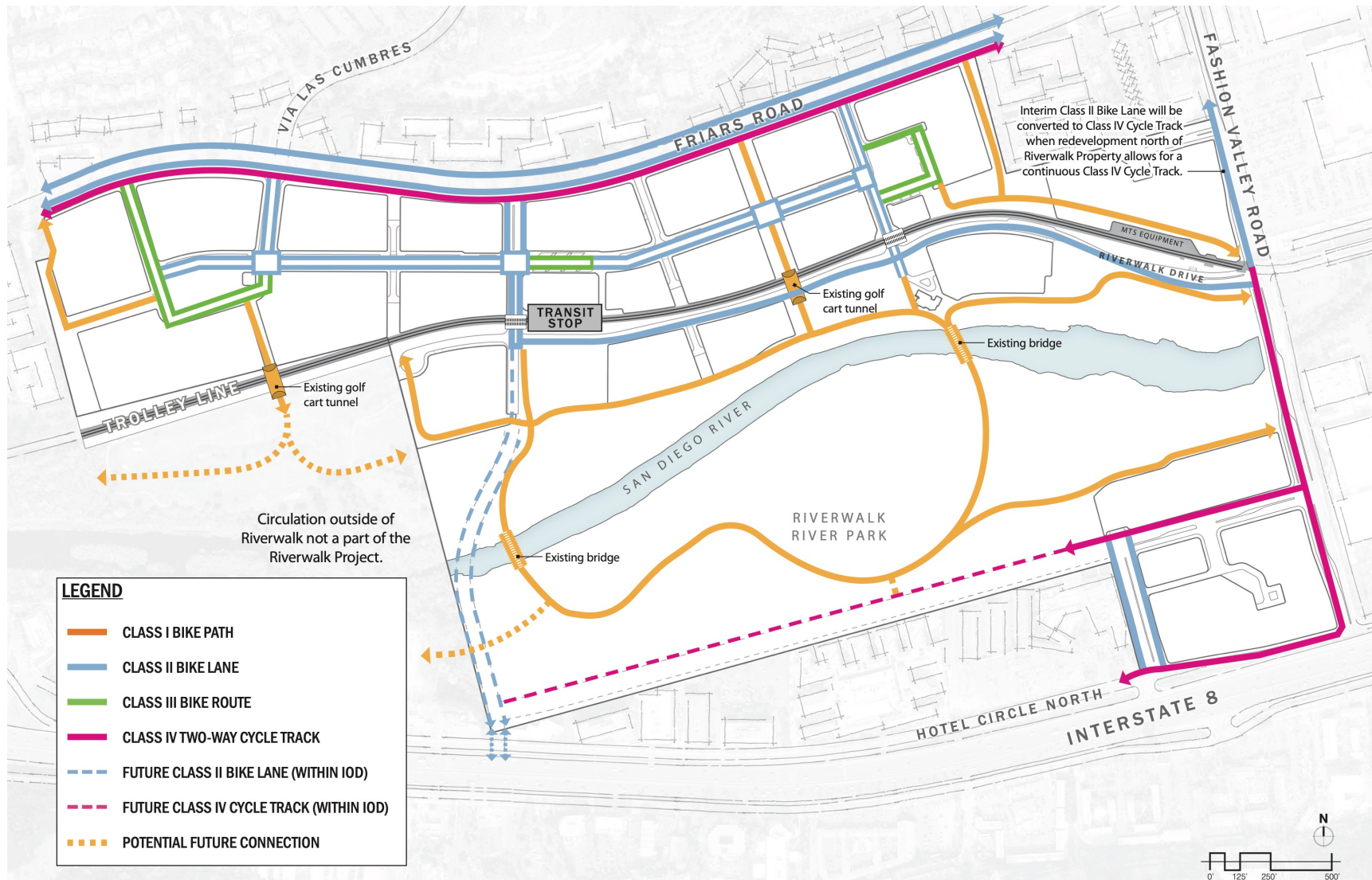
Figure 3-4. Pedestrian Circulation

3.0 PROJECT DESCRIPTION



Figure 3-5. Conceptual Landscape Plan

3.0 PROJECT DESCRIPTION



FOR ILLUSTRATIVE CONCEPT PURPOSES ONLY

Figure 3-6. Bicycle Circulation Plan

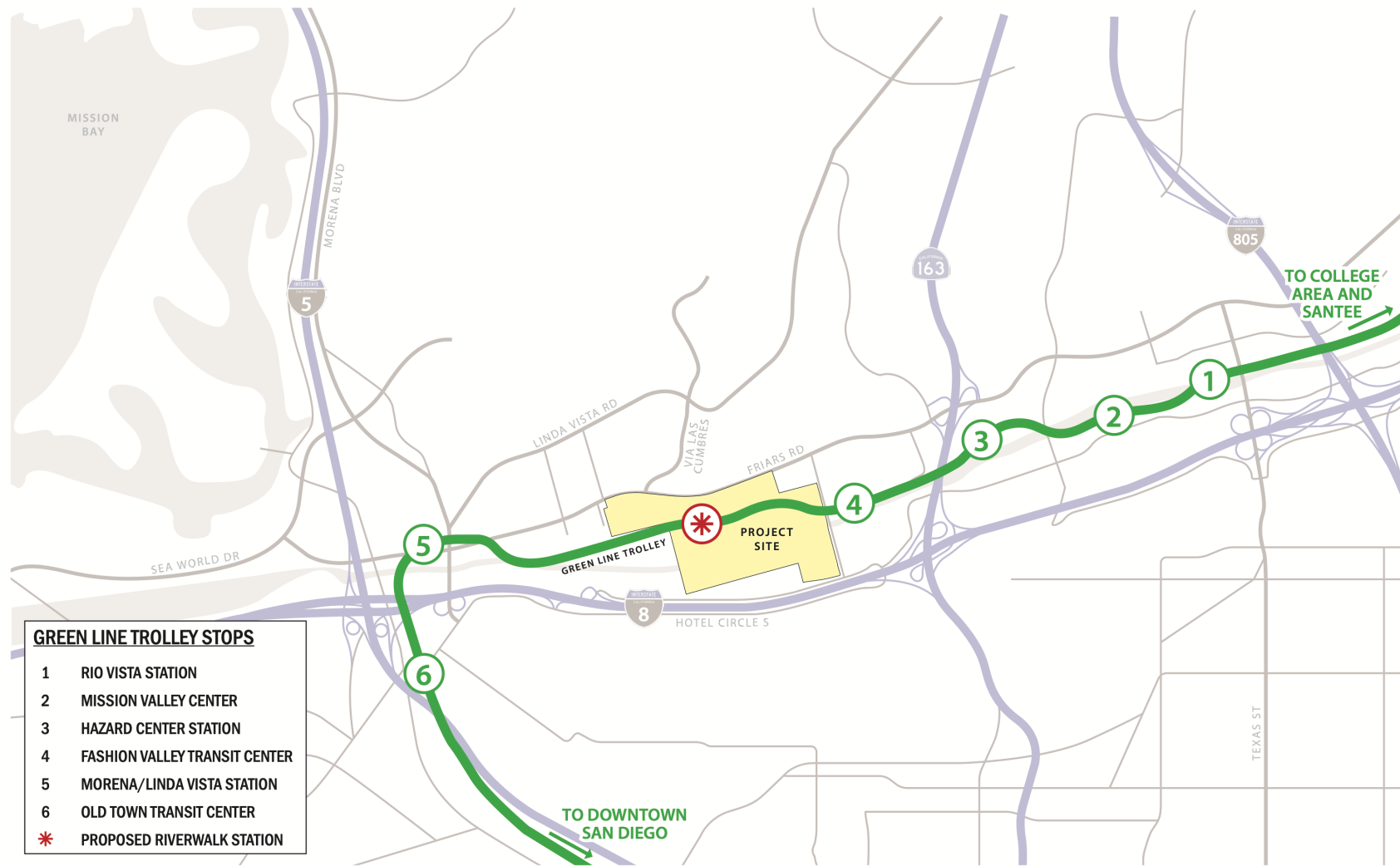


Figure 3-7. Existing Green Line Trolley Network and Proposed Trolley Stop

3.0 PROJECT DESCRIPTION

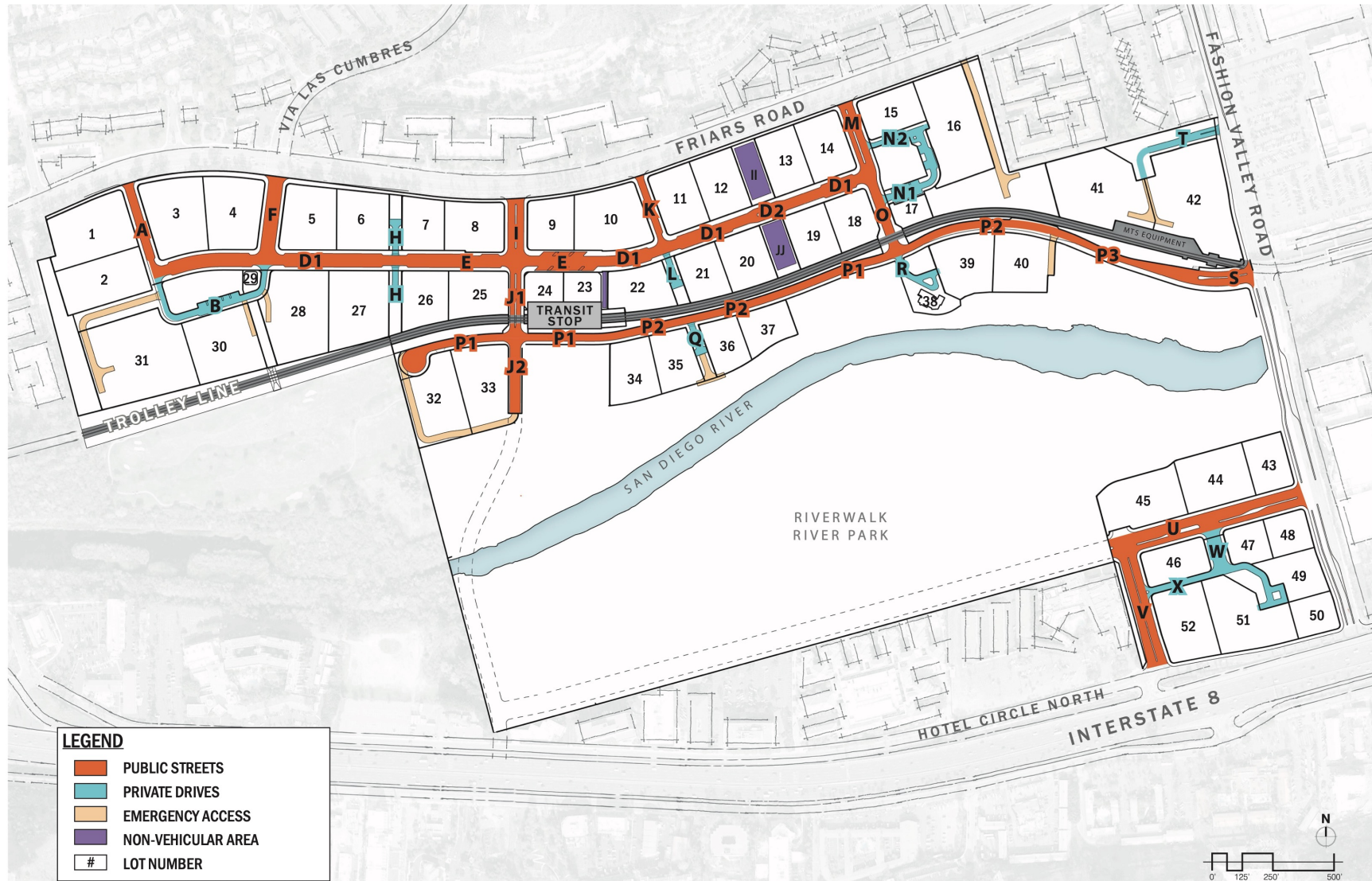


Figure 3-8. Vehicular Circulation Plan

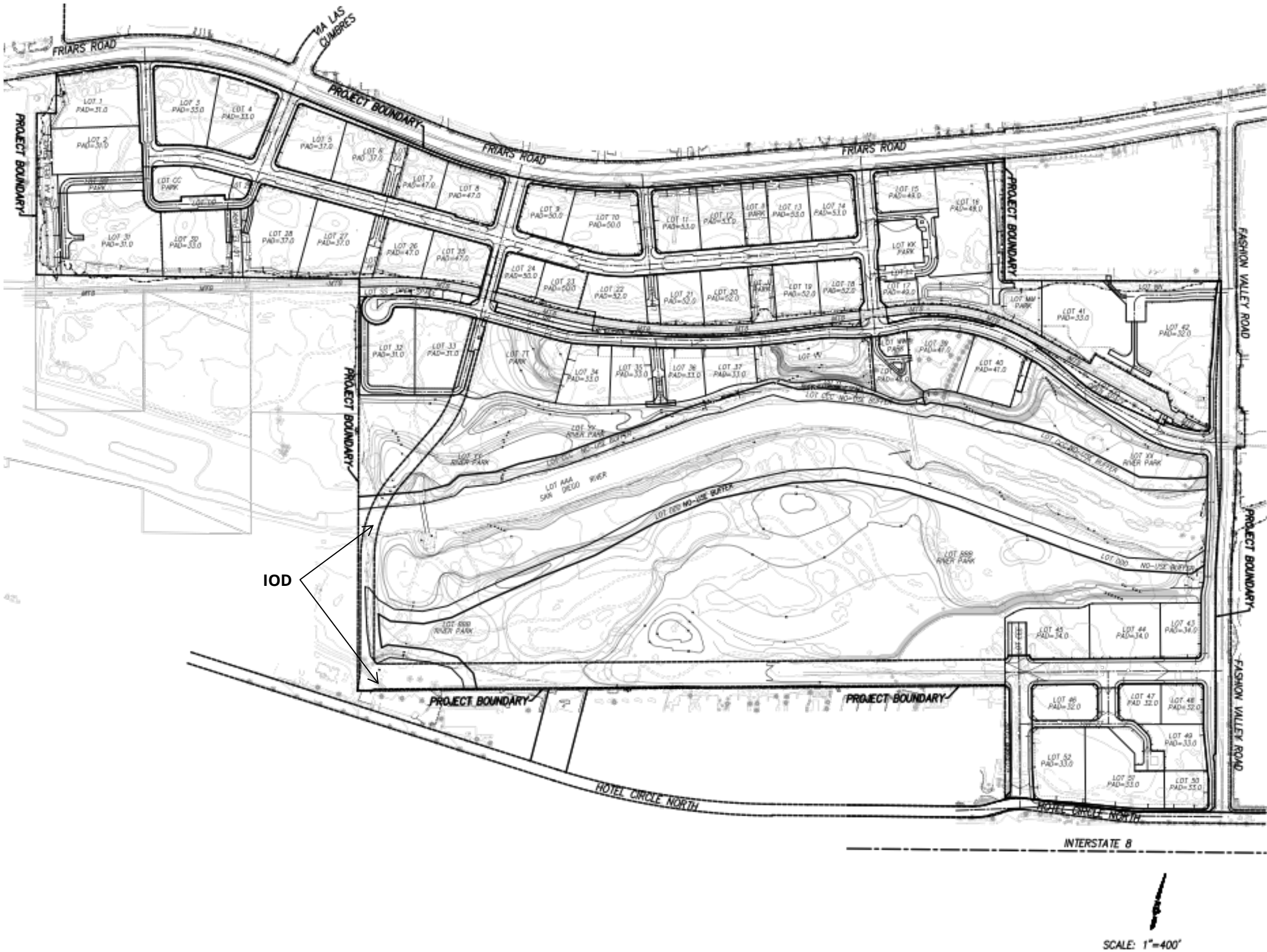


Figure 3-9. Riverwalk Grading Plan

3.0 PROJECT DESCRIPTION

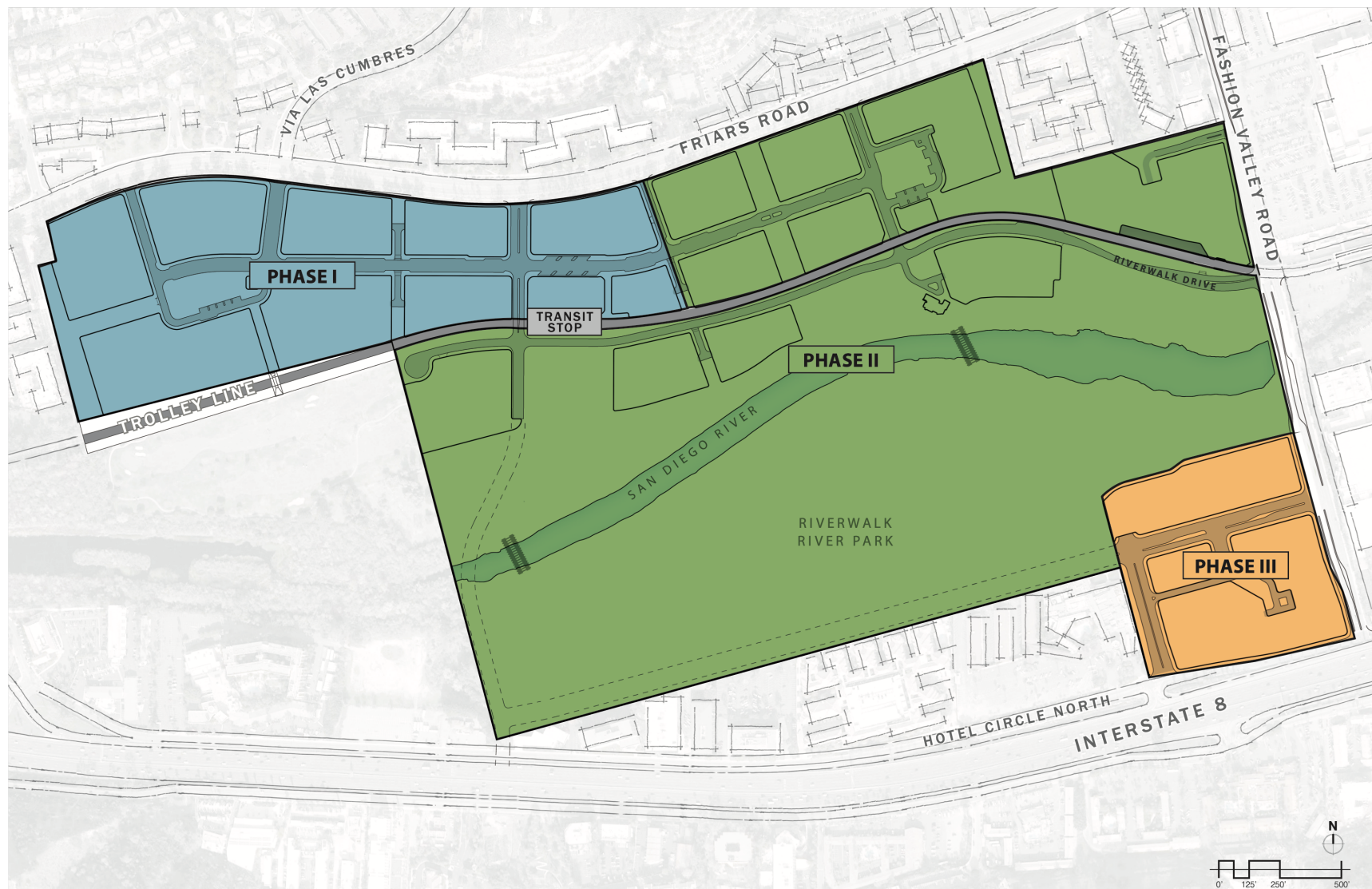


Figure 3-10. Riverwalk Phasing Plan

3.0 PROJECT DESCRIPTION

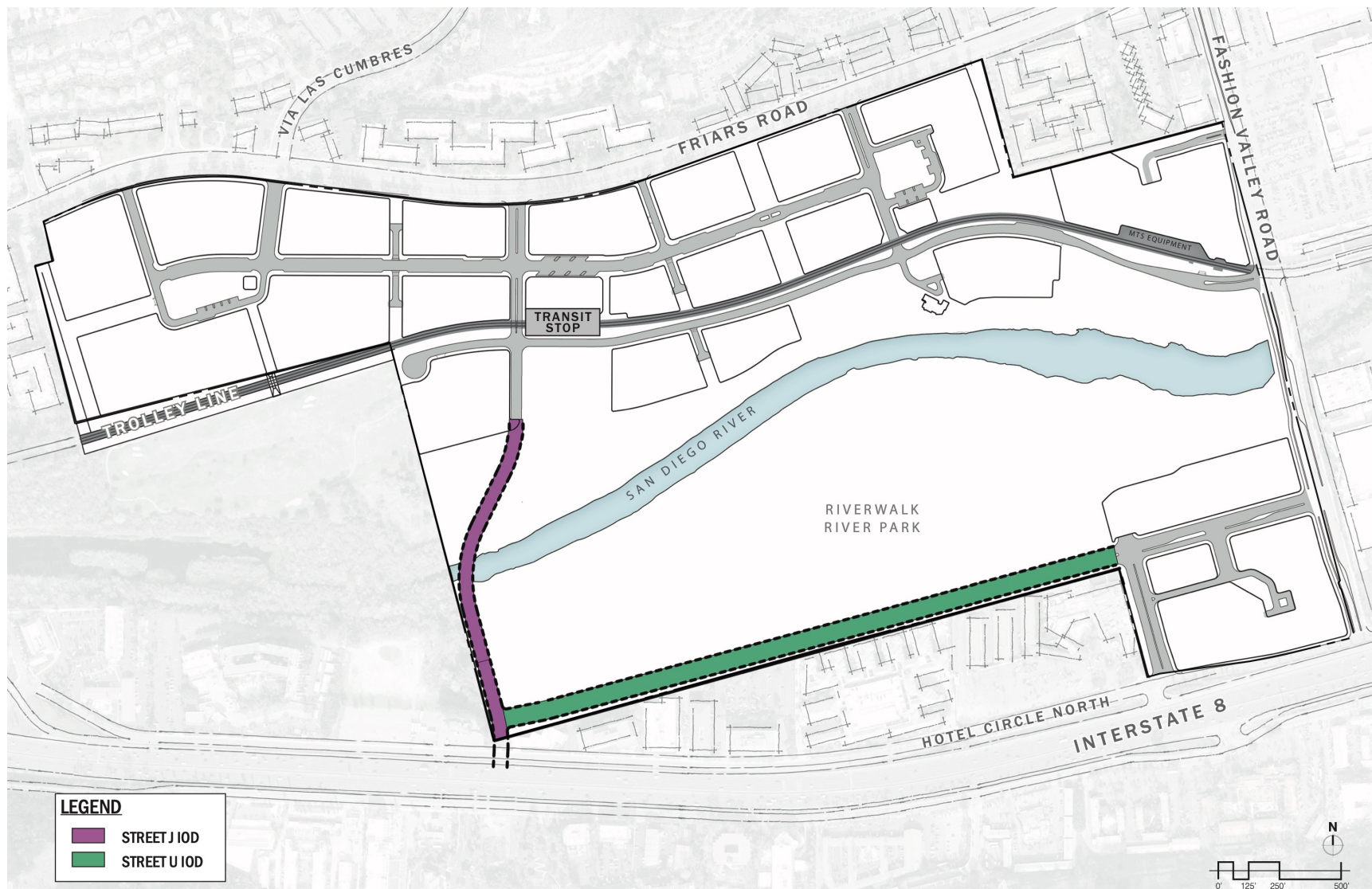


Figure 3-11. Irrevocable Offers of Dedication Location Map

3.0 PROJECT DESCRIPTION



Figure 3-12. Proposed Zoning

3.0 PROJECT DESCRIPTION

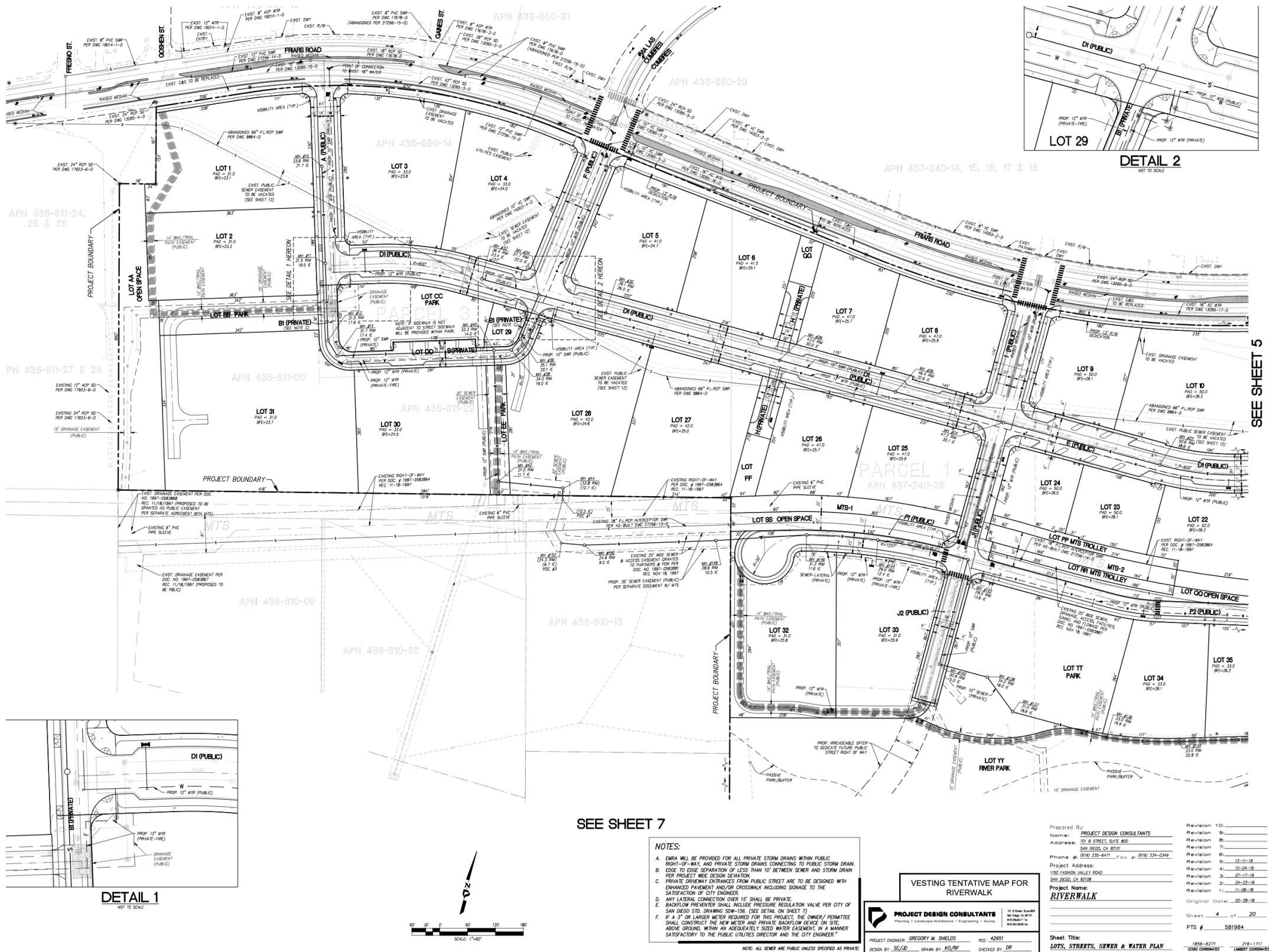


Figure 3-13a. Riverwalk Vesting Tentative Map

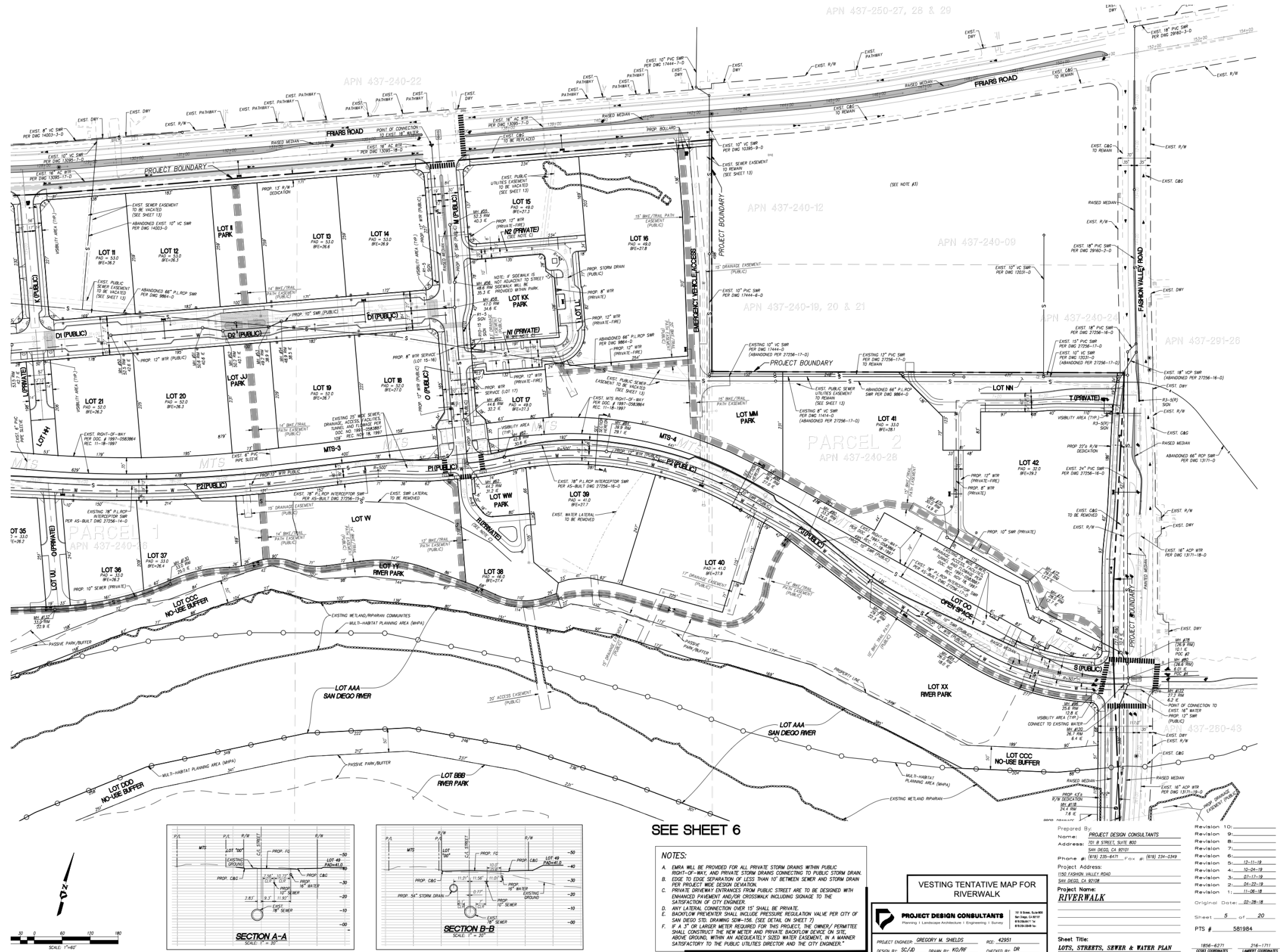


Figure 3-13b. Riverwalk Vesting Tentative Map

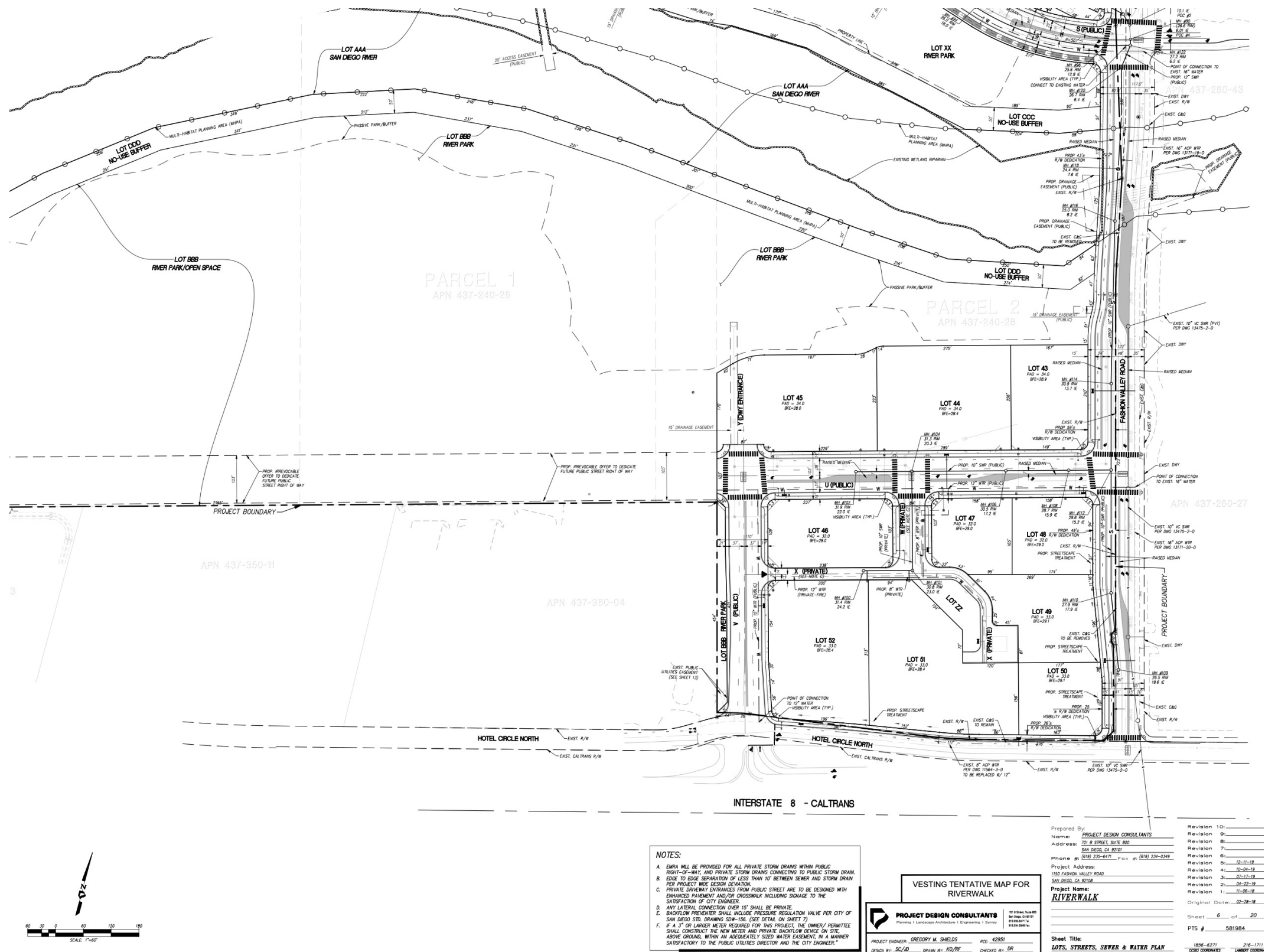


Figure 3-13c. Riverwalk Vesting Tentative Map

3.0 PROJECT DESCRIPTION

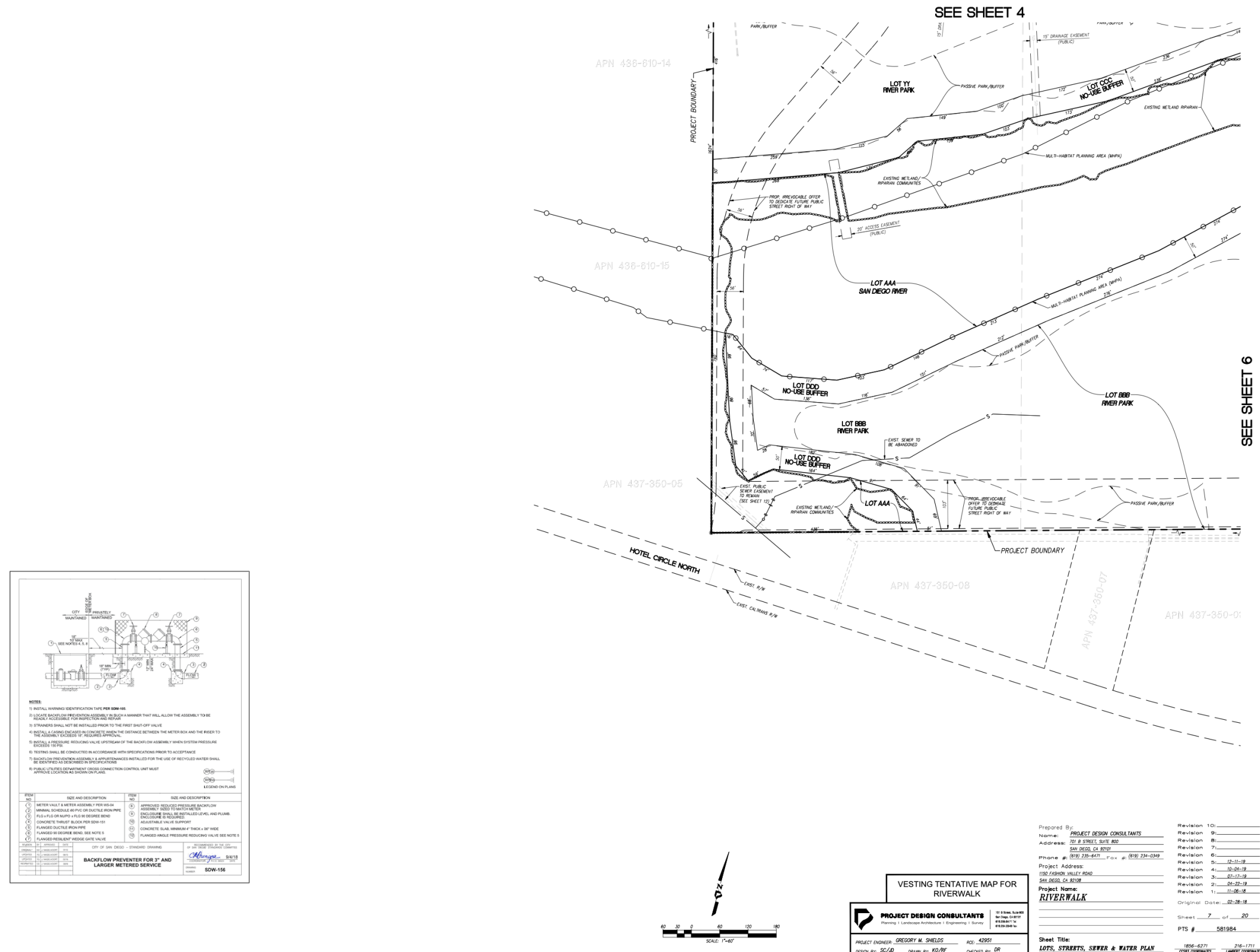


Figure 3-13d. Riverwalk Vesting Tentative Map

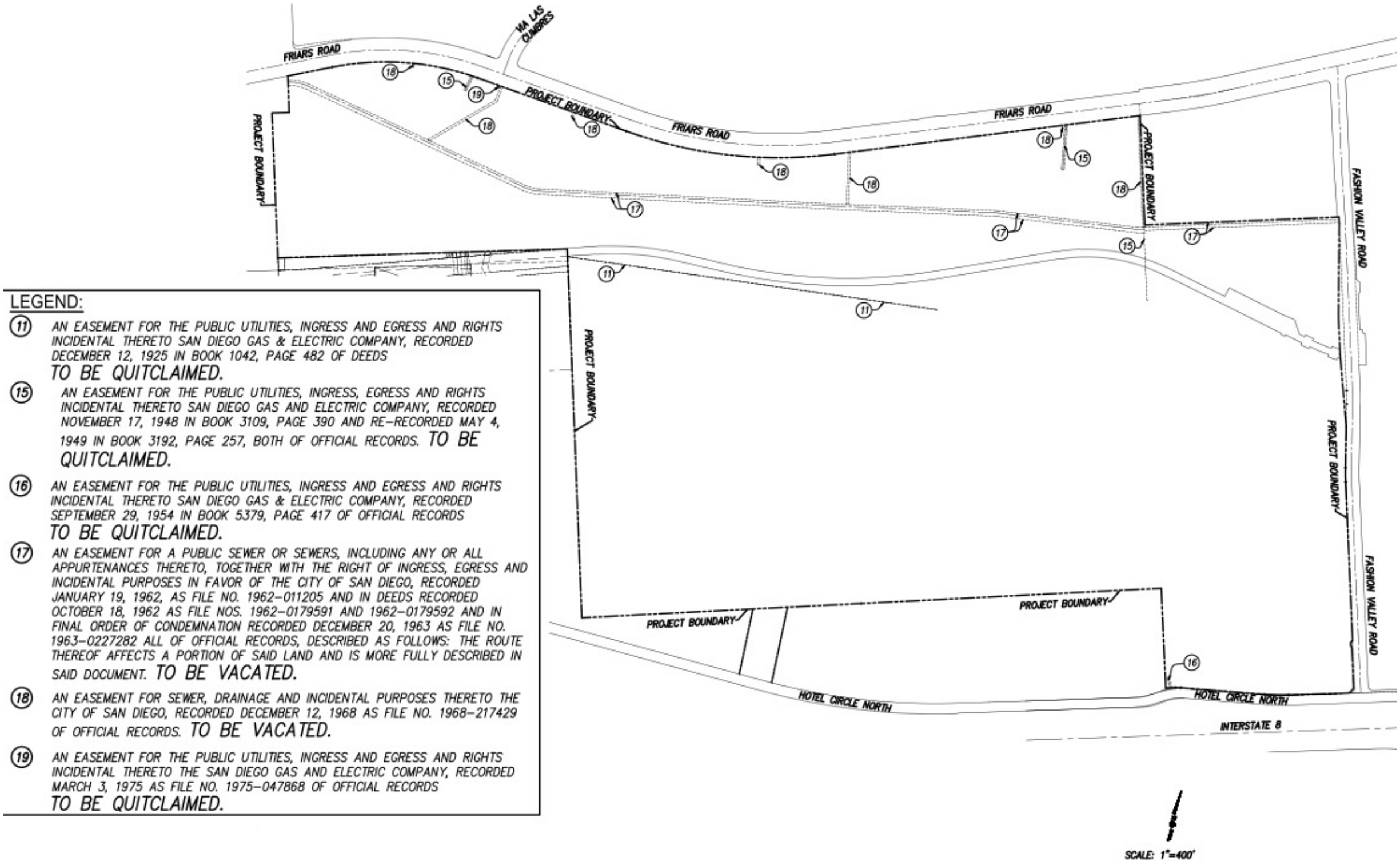


Figure 3-14. Public Right-of-Way and Easement Vacations

3.0 PROJECT DESCRIPTION

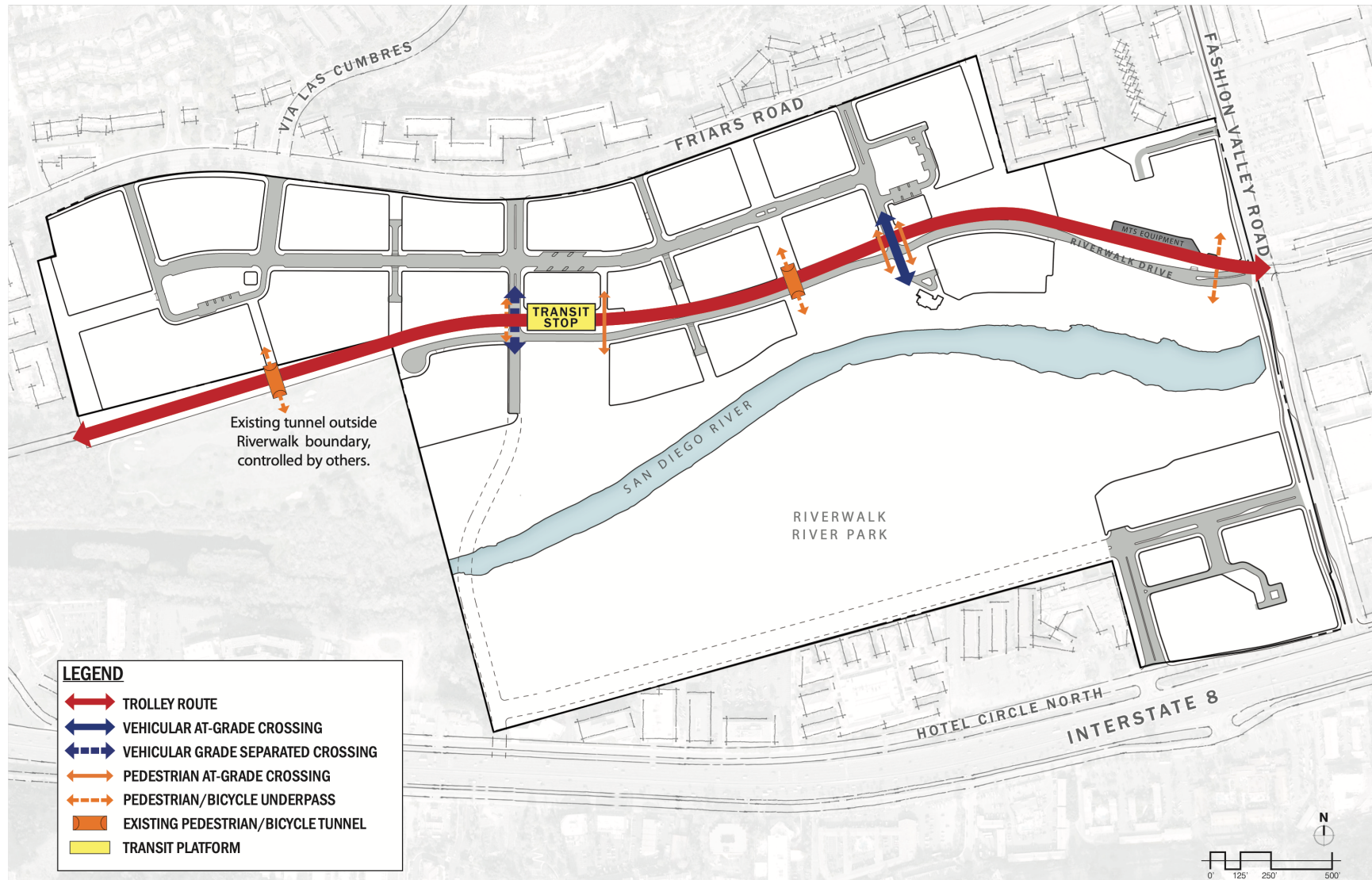


Figure 3-15. Trolley Crossings

4.0 HISTORY OF PROJECT CHANGES

This section chronicles the physical changes that have been made to the project in response to revisions requested by City staff, as well as through the project review and refinement process. These changes are described below.

- Residential density for the project was increased from the original application in response to City concerns regarding transit supportive housing and the request that a greater number of residential units be located in proximity of transit. The commercial retail and office and non-retail commercial intensity was increased at the request of the City and MTS to support transit. The locations of parks and buildings in the Central District were swapped so that additional transit-supportive density would be built immediately adjacent to the trolley stop.
- The Riverwalk Specific Plan circulation element replaces the extension of Via las Cumbres shown in the Levi-Cushman Specific Plan with an IOD for future public Street 'J' roughly 900 feet to the east. As a result, the one-way public streets around the parks at both ends of the spine street in the North District were eliminated and the western park was reconfigured as a result of the removal of the Via las Cumbres bridge to the IOD proposed for the future construction of public Street 'J'. This reconfiguration allows for direct pedestrian access to the existing tunnel providing linkage to the adjacent MTS parcel.
- The vehicle entry from Hotel Circle North was shifted from the mid-point of the frontage to the western edge of the property to facilitate access to and from I-8. This configuration has not yet been approved by Caltrans.
- In coordination with MTS, in response to comments from the CPUC, a proposed at-grade pedestrian/bicycle/automobile crossing of the trolley tracks at the proposed trolley stop was replaced with a tunnel under the tracks. This undercrossing also shortens the bridge across the valley at Street 'J', by allowing Street 'J' to remain at-grade for a longer distance, and provides for enhanced safety to vehicles, pedestrians/bicyclists, and the trolley.
- Adjustments were made to the proposed bicycle and pedestrian network in response to comments from City of San Diego Long-Range Planning and Development Services Transportation staff, thereby providing an expanded bicycle facility network and pedestrian connectivity both internal to the Specific Plan area and external to the community-wide bicycle and pedestrian circulation network.
- All public streets were revised to include a minimum Class II bicycle facility, with the exception of Street A where a parallel Class I bicycle facility was added.

4.0 HISTORY OF PROJECT CHANGES

- The location of the proposed trolley stop was shifted based upon the geometry of the trolley tracks and the exacting standards of the CPUC and MTS. The proposed location, 900 feet to the east, is more central between the Morena/Linda Vista and the Fashion Valley Transit Center trolley stations, adding balance to the provision of access to light rail transit through the valley core. The shifted location also ensures that the entire project would be located within one-half mile of either an existing or proposed trolley stop. Additional safety features and design elements were added based on CPUC comments to ensure pedestrian safety.
- The pad grading in the South District was reduced, pulling the grading easterly and southerly to consolidate the building pads. This resulted in increasing the acreage of the Riverwalk River Park and widening of the floodway, as well as allowing for additional flood capacity during storm events.
- A building pad was shifted from the west side of the existing clubhouse to the west side Street J2 abutting the eastern limits of the MTS parcel to accommodate Street 'J' and avoid a road bisecting park space.
- The San Diego River Pathway was relocated to the north side of the San Diego River in collaboration with the San Diego River Park Foundation and to connect with the existing path on the north side of the Town and Country Resort Hotel property.
- A 50-foot-wide no-use buffer was incorporated adjacent to the MHPA wetland habitat creation and preservation areas to provide a biological buffer to sensitive biological areas.
- A total of 13 acres of developable area was eliminated south of the San Diego River, due to feedback and concern about impacts to the floodway. Specifically, the San Diego River Park Foundation was concerned about channelization of the San Diego River due to encroachments into the floodway south of the San Diego River. These 13 acres of developable area were removed to allow a wider floodway across the Riverwalk property.
- A future vehicular exit from Mission Greens to an on-site private Drive 'T' within Riverwalk was added. This connection, based on coordination with adjacent property owners at Mission Greens, is anticipated to provide a one-way exit to allow Mission Greens' residents to exit to Riverwalk through a future gate along the shared property line, subject to design approval of the Mission Greens Homeowners Association.
- A Special Treatment Area (Special Treatment Area – The Courtyards Community Interface) and specific policies (Riverwalk Specific Plan N-7, N-8, and N-9) were added to the Riverwalk Specific Plan to address the Specific Plan area interface with the existing The Courtyards multi-family residential community. These policies ensure setbacks, building heights, and building design in response to the desires of the Courtyards Homeowners Association. In

4.0 HISTORY OF PROJECT CHANGES

response to concerns from The Courtyards Homeowners Association and individual residents about pedestrian/bicycle connectivity to/from the Riverwalk Specific Plan area, the pedestrian bridge linkage from the western end of the North District to The Courtyards was eliminated.

5.1 Land Use

The following section evaluates potential land use impacts associated with the project in relation to land uses, zoning and other regulations, and policies that are applicable to the project.

5.1.1 Existing Conditions

The Specific Plan area is developed with the Riverwalk Golf Course, comprised of three nine-hole golf courses, driving range, clubhouse building, maintenance facilities, surface parking, access roadways, and golf cart paths/bridges. The San Diego River runs in an east-west manner roughly through the center of the project site; and the MTS Green Line Trolley traverses the project site in an east-west manner in the upper portion of the site, generally parallel to Friars Road. An approximately 15-acre vacant property owned by MTS is located immediately west of the project site.

Land uses surrounding the project site include multi-family residential developments to the west and east/northeast. Multi-family residential and commercial office developments are located to the north. Commercial retail and hospitality uses are located east of the project site. The hospitality use located to the east of the site, Town and Country Resort Hotel, is currently being redeveloped to include multi-family residential use at this location. A mix of office, multi-family residential, and hotel uses, as well as I-8, are located south of the project site. The Linda Vista community is adjacent to the Specific Plan area to the north.

5.1.2 Regulatory Framework

The planning context of the *Environmental Setting*, Chapter 2.0 of this EIR, describes the land use plans and development regulations that apply to the development of the project. The following provides a summary of the pertinent goals, objectives, and recommendations of the planning documents that affect development of the project including the General Plan, the Climate Action Plan, the San Diego River Park Master Plan, the Mission Valley Community Plan, the Land Development Code, the Environmentally Sensitive Lands regulations, the MSCP Subarea Plan, San Diego Forward: The Regional Plan (specifically the SANDAG Smart Growth Concept Map), and the San Diego International Airport and Montgomery Field ALUCPs. A discussion of the project's compatibility with these plans is provided in Section 5.1.3, *Impact Analysis*.

5.1.2.1 City of San Diego General Plan

The General Plan sets forth a comprehensive, long-term plan for development within the City of San Diego. The General Plan guides development and addresses State requirements through the following ten elements: Land Use and Community Planning; Mobility; Economic Prosperity; Public

Facilities, Services, and Safety; Urban Design; Recreation; Historic Preservation; Conservation; Noise; and Housing.

Land Use and Community Planning Element

The *Land Use and Community Planning Element (Land Use Element)* of the General Plan guides *future growth and development into a sustainable citywide development pattern, while maintaining or enhancing the quality of life*. This element provides policies to *implement the City of Villages strategy* and establishes a framework to guide and govern the preparation of community plans tailored to each community.

City of Villages Strategy

One major component of the Land Use Element that guides not only land use goals and policies, but also provides the overall vision for the General Plan is the City of Villages strategy. The City of Villages strategy focuses *growth into mixed-use activity centers that are pedestrian-friendly, centers of community, and linked to the regional transit system. The strategy draws upon the strengths of San Diego's natural environment, neighborhoods, commercial centers, institutions, and employment centers and focuses on the long-term economic, environmental, and social health of the City and its many communities. The City of Villages Strategy recognizes the value of San Diego's distinctive neighborhoods and open spaces that together form the City as a whole. Implementation of the City of Villages strategy is an important component of the City's strategy to reduce local contributions to greenhouse gas emissions, because the strategy makes it possible for larger numbers of people to make fewer and shorter auto trips.* The following relevant goal and policies apply to the project:

- *Goal. Mixed-use villages located throughout the City and connected by high-quality transit.*
- *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.*
- *LU-A.4. Locate village sites where they can be served by existing or planned public facilities and services, including transit services.*
- *LU-A.7. Determine the appropriate mix and densities/intensities of village land uses at the community plan level, or at the project level when adequate direction is not provided in the community plan.*
- *LU-A.7.b. Achieve transit-supportive density and design, where such density can be adequately served by public facilities and services[...]. Due to the distinctive nature of each of the community planning areas, population density and building intensity will differ by each community.*

Other relevant goals and policies of the Land Use Element are included below:

Balanced Communities and Equitable Development

- *Goal. Ensure diverse and balanced neighborhoods and communities with housing available for households of all income levels.*

- *LU-H.1.d. Ensure that neighborhood development and redevelopment addresses the needs of older people, particularly those disadvantaged by age, disability, or poverty.*
- *LU-H.2. Provide affordable housing throughout the City so that no single area experiences a disproportionate concentration.*
- *LU-H.3. Provide a variety of housing types and sizes with varying levels of affordability in residential and village developments.*
- *LU-H.6. Provide linkages among employment sites, housing, and villages via an integrated transit system and a well-defined pedestrian and bicycle network.*
- *LU-H.7. Provide a variety of different types of land uses within a community in order to offer opportunities for a diverse mix of uses and to help create a balance of land uses within a community.*

Environmental Justice

- *Goal. Improve mobility options and accessibility in every community.*

Mobility Element

The Mobility Element of the General Plan provides the framework *to improve mobility through development of a balanced, multi-modal transportation network* that is efficient and minimizes environmental and neighborhood impacts. It is closely linked to the Land Use and Community Planning Element and the City of Villages strategy. Project-relevant policies contained within the Mobility Element address the need to improve walkability and the bicycle network, increase transit use, improve performance and efficiency of the street and freeway system, and provide sufficient parking facilities. Specifically, the following goals and policies apply to the project:

Walkable Communities

- *Goal. A city where walking is a viable travel choice, particularly for trips of less than one-half mile.*
- *Goal. A safe and comfortable pedestrian environment.*
- *Goal. A complete, functional, and interconnected pedestrian network, that is accessible to pedestrians of all abilities.*
- *Goal. Greater walkability achieved through pedestrian-friendly street, site, and building design.*
- *ME-A.2.d. Implement Crime Prevention Through Environmental Design (CPTED) measures to reduce the threat and incidence of crime in the pedestrian environment.*
- *ME-A.2.f. Provide adequate levels of lighting for pedestrian safety and comfort.*
- *ME-A.6.a.3. Design grading plans to provide convenient and accessible pedestrian connections from new development to adjacent uses and streets.*
- *ME-A.7.a. Enhance streets and other public rights-of-way with amenities such as street trees, benches, plazas, public art or other measures including, but not limited to those described in the Pedestrian Improvement Toolbox, Table ME-1 [of the City of San Diego Mobility Element].*
- *ME-A.7.b. Design site plans and structures with pedestrian-oriented features.*

- *ME-A.7.c. Encourage the use of non-contiguous sidewalk design where appropriate to help separate pedestrians from auto traffic. In some areas, contiguous sidewalks with trees planted in grates adjacent to the street may be a preferable design.*
- *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.*

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.*
- *ME-3.9.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.*

Street and Freeway System

- *Goal. An interconnected street system that provides multiple linkages within and between communities.*
- *Goal. Safe and efficient street design that minimizes environmental and neighborhood impacts.*
- *ME-C.3. Design an interconnected street network within and between communities, which includes pedestrian and bicycle access, while maintaining landform and community character impacts.*

Transportation Demand Management

- *Goal. Expanded travel options and improved personal mobility.*
- *ME-E.3. Emphasize the movement of people rather than vehicles.*

Bicycling

- *Goal. A safe and comprehensive local and regional bikeway network.*

Parking Management

- *Goal. New development with adequate parking through the application of innovative citywide parking regulations.*
- *Goal. Increased land use efficiencies in the provision of parking.*

Urban Design Element

The General Plan's *Urban Design Element* addresses the integration of new development into the natural landscape and/or existing community. The element discusses an Urban Design Strategy, or framework, for development as *envisioned in the City of Villages strategy*. Relevant goals and policies are as follows:

General Urban Design

- *Goal. A built environment that respects San Diego's natural environment and climate.*

- *Goal. An improved quality of life through safe and secure neighborhoods and public places.*
- *Goal. A pattern and scale of development that provides visual diversity, choice of lifestyle, opportunities for social interaction, and that respects desirable community character and context.*
- *Goal. A City with distinctive districts, communities, neighborhoods, and village centers where people gather and interact.*
- *Goal. Utilization of landscape as an important aesthetic and unifying element throughout the City.*
- *UD-A.3. Design development adjacent to natural features in a sensitive manner to highlight and complement the natural environment in areas designated for development.*
- *UD-A.4. Use sustainable building methods in accordance with the sustainable development policies in the Conservation Element.*
- *UD-A.5. Design buildings that contribute to a positive neighborhood character and relate to neighborhood and community context.*
- *UD-A.5.d. Encourage the use of materials and finishes that reinforce a sense of quality and permanence.*
- *UD-A.6. Create street frontages with architectural and landscape interest to provide visual appeal to the streetscape and enhance the pedestrian experience.*
- *UD-A.6.a. Locate buildings on the site so that they reinforce street frontages.*
- *UD-A.6.c. Ensure that building entries are prominent, visible, and well-located.*
- *UD-A.6.d. Maintain existing setback patterns, except where community plans call for a change to the existing pattern.*
- *UD-A.6.e. Minimize the visual impact of garages, parking and parking portals to the pedestrian and street façades*
- *UD-A.8. Landscape materials and design should enhance structures, create and define public and private spaces, and provide shade, aesthetic appeal, and environmental benefits.*
- *UD-A.8.b. Use water conservation through the use of drought-tolerant landscape, porous materials, and reclaimed water where available.*
- *UD-A.8.e. Landscape materials and design should complement and build upon the existing character of the neighborhood.*
- *UD-A.9. Incorporate existing and proposed transit stops or stations into project design.*
- *UD-A.11. Encourage the use of underground or above-ground parking structures, rather than surface parking lots, to reduce land area devoted to parking.*
- *UD-A.12. Reduce the amount and visual impact of surface parking lots.*
- *UD-A.13. Provide lighting from a variety of sources at appropriate intensities and qualities for safety.*
- *UD-A.17. Incorporate Crime Prevention Through Environmental Design (CPTED) measures, as necessary, to reduce incidences of fear and crime, and design safer environments.*

Distinctive Neighborhoods and Residential Design

- *Goal. A City of distinctive neighborhoods.*
- *Goal. Architectural design that contributes to the creation and preservation of neighborhood character and vitality.*

- *Goal. Innovative design for a variety of housing types to meet the needs of the population.*
- *Goal. Infill housing, roadways, and new construction that are sensitive to the character and quality of existing neighborhoods.*
- *Goal. Pedestrian connections linking residential areas, commercial areas, parks, and open spaces.*
- *UD-B.1. Recognize that the quality of a neighborhood is linked to the overall quality of the built environment. Projects should not be viewed singularly, but viewed as part of the larger neighborhood or community plan area in which they are located for design continuity and compatibility.*
- *UD-B.4. Create street frontages with architectural and landscape interest for both pedestrians and neighboring residents.*
- *UD-B.5. Design or retrofit streets to improve walkability, strengthen connectivity, and enhance community identity.*
- *UD-B.8. Provide useable open space for play, recreation, and social or cultural activities in multi-family as well as single-family projects.*

Mixed-Use Villages and Commercial Areas

- *Goal. Mixed-use villages that achieve an integration of uses and serve as focal points for public gathering as a result of their outstanding public spaces.*
- *Goal. Vibrant, mixed-use main streets that serve as neighborhood destinations, community resources, and conduits to the regional transit system.*
- *Goal. Neighborhood commercial shopping areas that serve as walkable centers of activity.*
- *UD-C.1. In villages and transit corridors identified in community plans, provide a mix of uses that create vibrant, active places in villages.*
- *UD-C.2. Design village centers to be integrated into existing neighborhoods through pedestrian-friendly site design and building orientation, and the provision of multiple pedestrian access points.*
- *UD-C.3. Develop and apply building design guidelines and regulations that create diversity rather than homogeneity, and improve the quality of infill development.*
- *UD-C.4. Create pedestrian-friendly villages.*
- *UD-C.5. Design village centers as civic focal points for public gatherings with public spaces.*
- *UD-C.6. Design project circulation systems for walkability.*
- *UD-C.7. Enhance the public streetscape for greater walkability and neighborhood aesthetics.*

Office and Business Park Development

- *Goal. Promote the enhanced visual quality of office and industrial development.*
- *Goal. Provide increased pedestrian and transit orientation within office and industrial developments.*
- *UD-D.1. Provide expanded opportunities for local access and address the circulation needs of pedestrians within and among office and business park developments.*
- *UD-D.2. Assure high quality design of buildings and structures. The design and orientation of buildings within projects affect the pedestrian- and transit-orientation.*

Public Spaces and Civic Architecture

- *Goal.* Significant public gathering spaces in every community.
- *UD-E.1.* Include public plazas, squares, or other gathering spaces in each neighborhood and village center.

Economic Prosperity Element

The *Economic Prosperity Element* of the General Plan links economic prosperity goals with land use distribution and employment land use policies. Its purpose is *to increase wealth and the standard of living of all San Diegans with policies that support a diverse, innovative, competitive, entrepreneurial, and sustainable local economy*. This element primarily deals with various industrial, commercial and other employment uses within the City. Relevant goals and policies for the project include:

Commercial Land Use

- *Goal.* Commercial development which uses land efficiently, offers flexibility to changing resident and business shopping needs, and improves environmental quality.
- *Goal.* Economically healthy neighborhood and community commercial areas that are easily accessible to residents.
- *Goal.* New commercial development that contributes positively to the economic vitality of the community and provides opportunities for new business development.

Employment Development

- *Goal.* A city with an increase in the number of quality jobs for local residents, including middle-income employment opportunities and jobs with career ladders.

Public Facilities, Services, and Safety Element

The *Public Facilities, Services and Safety Element (Public Facilities Element)* addresses facilities and services that are publicly managed and have a direct influence on the location of land uses. These include *Fire-Rescue, Police, Wastewater, Storm Water, Water Infrastructure, Waste Management, Libraries, Schools, Information Infrastructure, Disaster Preparedness, and Seismic Safety*. The Public Facilities Element includes the following goals and policies relevant to the project:

Evaluation of Growth, Facilities, and Services

- *Goal.* Adequate public facilities that are available at the time of need.
- *PF-C.1.* Require development proposals to fully address impacts to public facilities and services.

Fire-Rescue

- *Goal.* Protection of life, property, and environment by delivering the highest level of emergency and fire-rescue services, hazard prevention, and safety education.
- *PF-D.12.a.* Assess site constraints when considering land use designations near wildlands to avoid or minimize wildfire hazards as part of a community plan update or amendment.

- *PF-D.13. Incorporate fire safe design into development within very high fire hazard severity zones to have fire-resistant building and site design, materials, and landscaping as part of the development review process.*

Police

- *Goal. Safe, peaceful, and orderly communities.*

Storm Water Infrastructure

- *Goal. Protection of beneficial water resources through pollution prevention and interception efforts.*
- *Goal. A storm water conveyance system that effectively reduces pollutants in urban runoff and storm water to the maximum extent practicable.*

Waste Management

- *Goal. Maximum diversion of materials from disposal through the reduction, reuse, and recycling of wastes to the highest and best use.*

Seismic Safety

- *Goal. Development that avoids inappropriate land uses in identified seismic risk areas.*
- *PF-Q.1. Protect public health and safety through the application of effective seismic, geologic, and structural considerations.*

Recreation Element

The General Plan's *Recreation Element* addresses the preservation, protection, acquisition, development, operation, maintenance, and enhancement of *public recreation opportunities and facilities throughout the City for all users*. The relevant goals and policies of the Recreation Element to the project is the following:

Recreational Opportunities

- *Goal. A City with a diverse range of active and passive recreational opportunities that meet the needs of each neighborhood/community and reinforce the City's natural beauty and resources.*

Preservation

- *Goal. Preserve, protect, and enrich natural, cultural, and historic resources that serve as recreation facilities.*
- *RE-C.2. Protect, manage, and enhance population- and resource-based parks and open space lands through appropriate means which include sensitive planning, park and open space dedications, and physical protective devices.*
- *RE-C.5. Design parks to preserve, enhance, and incorporate items of natural, cultural, or historic importance.*

Accessibility

- *Goal. Park and recreation facilities that are sited to optimize access by foot, bicycle, public transit, automobile, and alternative modes of travel.*
- *Goal. Provision of an inter-connected park and open space system that is integrated into and accessible to the community.*
- *Goal. Recreational facilities that are available for programmed and non-programmed uses.*
- *RE-D.2. Provide barrier-free trails and outdoor experiences and opportunities for persons with disabilities where feasible.*
- *RE-D.6. Provide safe and convenient linkages to, and within, park and recreation facilities and open space areas.*
- *RE-D.6.a. Provide pedestrian and bicycle paths between recreational facilities and residential development.*
- *RE-D.6.b. Designate pedestrian and bicycle corridors, and equestrian corridors where appropriate, that link residential neighborhoods with park and recreation facilities, trails, and open spaces.*
- *RE-D.6.c. Improve public access through development of, and improvements to, multi-use trails within urban canyons and other open space areas.*
- *RE-D.6.f. Identify key trails and access points as part of community plan updates, discretionary permit reviews, and other applicable land use and park planning documents.*

Open Space Lands and Resource-Based Parks

- *Goal. An open space and resource-based park system that provides for the preservation and management of natural resources, enhancement of outdoor recreation opportunities, and protection of the public health and safety.*

Conservation Element

The *Conservation Element* of the General Plan contains policies to *guide the conservation of resources that are fundamental components of San Diego's environment, that help define the City's identity, and that are relied upon for continued economic prosperity.* Sustainable development and climate change issues are also addressed through the Conservation Element. Conservation Element goals and policies relevant to the project include the following:

Climate Change & Sustainable Development

- *Goal. To reduce the City's overall carbon dioxide footprint by improving energy efficiency, increasing use of alternative modes of transportation, employing sustainable planning and design techniques, and providing environmentally sound waste management.*
- *CE-A.5. Employ sustainable or "green" building techniques for the construction and operation of buildings.*
- *CE-A.11. Implement sustainable landscape design and maintenance.*

Urban Runoff Management

- CE-E.2.g. Apply land use, site development, and zoning regulations that limit impacts on, and protect the natural integrity of topography, drainage systems, and water bodies.

Urban Forestry

- Goal. Protection and expansion of a sustainable urban forest.
- CE-J.1.b. Plant large canopy shade trees, where appropriate and with consideration of habitat and water conservation goals, in order to maximize environmental benefits.
- CE-J.1.c. Seek to retain significant and mature trees.

Noise Element

The *Noise Element* of the General Plan is intended to protect people living and working in the City of San Diego from excessive noise. The most prevalent noise source in the City is motor vehicle traffic. Goals and policies provided in the Noise Element guide compatible land uses and the incorporation of noise attenuation measures for new uses to protect people from an excessive noise environment. Specific goals and policies of the Noise Element applicable to the project include noise and land use compatibility, motor vehicle traffic noise, trolley and train noise, commercial and mixed-use activity noise, construction and public activity noise, and noise attenuating measures are provided to guide development. The Noise Element promotes the following goals and policies pertaining to noise relevant to the project:

Noise and Land Use Compatibility

- NE-A.2. Assure the appropriateness of proposed development relative to existing and future noise levels by consulting the guidelines for noise-compatible land use (Table 5.1-4) to minimize the effects on noise-sensitive land uses.
- NE-A.4. Require an acoustical study consistent with Acoustical Study Guidelines (General Plan Table NE-4) for proposed developments in areas where the existing or future noise level exceeds or would exceed the “compatible” noise level thresholds as indicated on the Land Use – Noise Compatibility Guidelines (Table 5.1-4), so that noise mitigation measures can be included in the project design to meet the noise guidelines.

Motor Vehicle Traffic Noise

- NE-B.4. Require new development to provide facilities which support the use of alternative transportation modes such as walking, bicycling, carpooling, and, where applicable, transit to reduce peak-hour traffic.

Trolley and Train Noise

- Goal. Minimal excessive fixed rail-related noise on residential and other noise-sensitive land uses.
- NE-C.1. Use site planning to help minimize exposure of noise sensitive uses to rail corridor and trolley line noise.

Commercial and Mixed-Use Activity Noise

- *Goal. Minimal exposure of residential and other noise-sensitive land uses to excessive commercial and mixed-use related noise.*
- *NE-E.1. Encourage the design and construction of commercial and mixed-use structures with noise attenuation methods to minimize excessive noise to residential and other noise-sensitive land use.*
- *NE-E.2. Encourage mixed-use developments to locate loading areas, parking lots, driveways, trash enclosures, mechanical equipment, and other noisier components away from the residential component of the development.*

Construction, Refuse Vehicles, Parking Lot Sweepers, and Public Activity Noise

- *Goal. Minimal exposure of residential and other noise-sensitive land uses to excessive construction, refuse vehicles, parking lot sweeper-related noise, and public noise.*

Typical Noise Attenuation Methods

- *Goal. Attenuate the effect of noise on future residential and other noise-sensitive land uses by applying feasible noise mitigation measures.*

Historic Preservation Element

The *Historic Preservation Element* guides the preservation, protection, restoration, and rehabilitation of historical and cultural resources. This element seeks to improve the quality of the built environment, encourage appreciation of the City's history and culture, maintain the character and identity of communities, and contribute to the City's economic vitality through historic preservation. The following policy is relevant to the Riverwalk Specific Plan:

Identification and Preservation of Historical Resources

- *HP-A.2. Fully integrate the consideration of historical and cultural resources in the larger land use planning process.*

Housing Element

The *Housing Element* serves as a policy guide to address the comprehensive housing needs of the City of San Diego. The Housing Element contains the following objective and policy relevant to the project:

- *Objective A: Identify and Make Available for Development Adequate Sites to Meet the City's Diverse Housing Needs*
- *HE-A.5. Ensure efficient use of remaining land available for residential development and redevelopment by requiring that new development meet the density minimums, as well as maximums, of applicable zone and plan designations.*

5.1.2.2 City of San Diego Climate Action Plan

The Climate Action Plan (CAP) includes a municipal operation and community-wide greenhouse gas (GHG) emissions baseline calculation from 2010 and sets a target to achieve a 15 percent reduction from the baseline by 2020, as required by California Assembly Bill (AB) 32. In its 2014 update to the Climate Change Scoping Plan, the California Air Resources Board (CARB) recommended local governments chart a reduction trajectory that is consistent with, or exceeds, the trajectory created by statewide goals, such as the GHG reduction target set in Executive Order S-3-05. To remain consistent in its GHG reduction calculation approach, the City calculated its 2050 GHG emission reductions at 80 percent below the 2010 baseline and set a 2035 target based upon the trajectory for meeting the City's 2050 reductions. Therefore, the 2035 target should be considered an "interim" target towards achieving the City's 2050 emission reductions target. The CAP sets forth common-sense strategies to achieve attainable GHG reduction targets and outlines the actions that City will undertake to achieve its proportional share of State GHG emission reductions.

The CAP is a plan for the reduction of GHG emissions in accordance with CEQA Guidelines Section 15183.5. Pursuant to CEQA Guidelines Sections 15064(h)(3), 15130(d), and 15183(b), a project's incremental contribution to a cumulative GHG emissions effect may be determined not to be cumulatively considerable if it complies with the requirements of the CAP. The City subsequently adopted the CAP Consistency Checklist to provide a streamlined review process for the analysis of potential GHG impacts from proposed new development.

See Section 5.9, *Greenhouse Gas Emissions*, for a detailed discussion of current legislation and regulations regarding climate change, the CAP, an evaluation of the Specific Plan's conformance evaluation with the CAP, and an evaluation of the project's consistency with the CAP Consistency Checklist.

5.1.2.3 San Diego River Park Master Plan

The SDRPMP provides the vision and guidance to restore a symbiotic relationship between the San Diego River and surrounding communities by creating a river-long park, stretching from the San Diego River headwaters near Julian, to the Pacific Ocean at Ocean Beach. The SDRPMP divides the San Diego River into six segments, known as reaches, and gives specific recommendations for each reach. The project site is located within the Lower Valley reach, which spans from I-5 to I-15. The SDRPMP also establishes two distinct planning areas: the River Corridor Area, which consists of the 100-year floodway along both river banks plus a 35-foot path corridor on each side, and the River Influence Area, which consists of the first 200 feet adjacent to the River Corridor Area on both sides of the river.

The SDRPMP identifies the project site as being located within the River Corridor Area and the River Influence Area. The purpose of the River Corridor Area is to restore the health of the San Diego River

by cleaning the river, improving its hydrologic function, increasing its length and recharge area, separating it from ponds, and creating opportunities for braiding and meandering. The purpose of the River Influence Area is to create a quality back drop to the River Corridor Area through design that treats the San Diego River as an amenity; orients development toward the river; and encourages active uses adjacent to the river channel and public access to the San Diego River Pathway. Design guidelines in the SDRPMP state that structures should be located and shaped in a manner that opens up views to the river from nearby districts, neighborhoods, and hillsides and a structure's location and shape on the site should create a spatial transition to the river. The architectural guidelines are also intended to reinforce the vision of river park as a community amenity by promoting quality architectural design, detailing, and building materials within the River Influence Area. Guidelines include building massing, variety and human scale, building transparency, building reflectivity, building lighting, building signs, and guidelines for landscape architecture.

The SDRPMP is closely aligned with the City's General Plan goals for land use, mobility, urban design, economic prosperity, public facilities, recreation, conservation, and historic preservation. The SDRPMP vision, principles, recommendations, and implementation strategy are included in the Riverwalk Specific Plan for consistency with the intent of the SDRPMP and to provide the City with a strong policy document for the future development along the river.

5.1.2.4 Mission Valley Community Plan

The Mission Valley Community Plan was comprehensively updated in 2019. The Mission Valley Community Plan includes specific design guidelines and general and site-specific policies. Applicable design guidelines are discussed in Section 5.3, *Visual Effects and Neighborhood Character*. The following general and site-specific policies apply to the Riverwalk Specific Plan:

Area-Specific Plan Guidance

Specific Plans should be considered to regulate the development of sites larger than 50 acres.

- *SPG-1. Establish the planning and policy functions in the specific plan for the area governed by the specific plan. Should an amendment be processed to a specific plan that was adopted prior to the adoption of this plan, the amendment should be consistent with the planning and policy functions of this community plan.*
- *SPG-2. Rescind obsolete specific plans where the property owner(s) deem them no longer relevant. Land uses and policies in this community plan would govern those sites after a rescission.*
- *SPG-3. Where appropriate, consider updating the Mission Valley Impact Fee Study for future specific plans, such as where a project-specific traffic analysis identifies community serving infrastructure not previously-anticipated. See: General Plan Policies PF-C.1 through PF-C.7.*
- *SPG-4. Coordinate the design of new transportation infrastructure included in specific plans with SANDAG, Caltrans, and MTS.*

Area-Specific: Freeway Adjacent

Areas directly adjacent to freeway should be designed to minimize exposure to nuisances.

- *FAD-1. Buffer buildings adjacent to a freeway from the freeway with off-street parking or landscaping.*
- *FAD-2. Orient freeway-adjacent buildings such that courtyards and residential units with operable windows and balconies face away from the freeway.*
- *FAD-3. Locate all residential units above the freeway elevation.*
- *FAD-4. Incorporate noise attenuation measures on all freeway-adjacent development.*

Area-Specific: San Diego River

Development in Mission Valley near the San Diego River should apply design strategies to help create the San Diego River Park.

- *SDR-1. Follow all Land Use Development Code, Chapter 14, Article 3, Division 1, Special Flood Hazard Areas; Chapter 14, Article 3, Division 1, Environmentally Sensitive Lands; and the San Diego River Park Master Plan requirements on all development within the River Corridor Area and the River Influence Area.*
- *SDR-2. Make trail entrances highly visible from the street and surrounding development, with recognizable and unified design elements at trail entrances, including landscaping, pedestrian-oriented amenities (e.g. drinking fountains and benches), signage, and pavers.*
 - *Where trails meet public roads, access points should be directly across from each other and the crossing should be signalized.*
 - *Wherever possible, pathways should be uninterrupted by conflicts with vehicles through grade separations.*
- *SDR-3. Link all recreational areas and plazas, passive or active, visually and/or physically to the River Corridor's passive recreation areas and facilities, so that they are integrated into the area-wide open space system.*
- *SDR-4. Step buildings down in height toward the San Diego River, in an effort to provide visual openings and a pedestrian scale of development along the River.*
- *SDR-5. Implement permanent best management practices, listed in the City's Storm Water Standards Manual, on all river area development. Incorporate both mandatory structural practices (swales, infiltration basin) and mandatory non-structural practices (restricted irrigation, aggressive street cleaning).*

Area-Specific: Transit Adjacent

Areas directly adjacent to transit should be designed to promote transit use.

- *TAD-1. Design building entrances and pedestrian paths to provide convenient access to the trolley, and, where possible, direct views of the trolley station.*
- *TAD-2. Make active uses, such as retail, café, and restaurants, visible and/or easily accessible to transit users embarking or disembarking the trolley stations.*
- *TAD-3. Incorporate pedestrian-oriented amenities on development within transit areas, such as enhanced streetscape design; parks; pocket parks; public plazas; large-canopy street trees; seating*

and shade structures; and water features, which shorten the perceived walking distances within transit areas.

- *TAD-4. Facilitate connectivity to transit stations through placement and orientation of pedestrian paths on site plans within transit areas.*

Composition: Blocks and Lots

Future development in Mission Valley should be developed in fine-grained block and lot patterns that promote connectivity.

- *BLK-1. Create a robust secondary street network in Mission Valley as development is completed. Incorporate new vehicular rights-of-way into plans for large sites such that block sizes do not exceed 500 feet in length.*
- *BLK-2. Design new blocks to be walkable. Maximum block size should be no greater than 300 feet by 600 feet. Encourage any block larger than 300 feet by 600 feet to have a publicly accessible pedestrian connection (paseo) that bisects the block to reduce travel distance for pedestrians.*
- *BLK-3. Lay out new streets in a connective pattern unless topography, environmental conditions, or the like make it infeasible.*
- *BLK-4. Connect new streets and mid-block pedestrian connections to the surrounding circulation network.*
- *BLK-5. Provide a pedestrian public access easement (paseo) through development that is greater than four acres. These easements should provide links between public roads, high activity centers, recreational areas, and transit corridors.*

Composition: Streetscapes

Development should help promote a pedestrian-scaled streetscape environment.

- *STS-1. Provide clear access to and visibility of the adjacent use in areas between pedestrian pathways and buildings. Enhance entrances and fenestration architecturally, with articulation, detailing, stoops/stairs, canopies, arcades, and/or signage.*
- *STS-2. Maintain the minimum following dimensions for the unobstructed path of travel for pedestrians (sidewalk) in/through building entry areas:*
 - *Six feet along local streets;*
 - *Eight feet along major/collector streets or abutting high intensity residential development along local streets; and*
 - *Ten feet abutting high intensity commercial development.*

Composition: Building Form and Design

Future development in Mission Valley should be designed to promote community cohesion.

- *BFD-1. Step back upper levels of buildings in areas where building heights vary to transition to adjacent lower building heights. Incorporate architectural elements into building design that smooth the transition between the new and existing architecture.*
- *BFD-2. Articulate building mass and surfaces with three-dimensional elements that reduce apparent bulk and create visual interest. Building design should include features such as*

balconies, recesses, projections, varied finishes, transparency, signage, reveals, brackets, cornices at the roof and at the top of the ground floor, and piers at corners and structural bays.

- *BFD-3. Utilize corner lots to highlight architecture features with changes in massing and building height and/or create defined building entrances or small plazas by increasing ground floor setbacks.*
- *BFD-4. Limit blank walls to 20 horizontal linear feet within Mission Valley; 30 feet when enhanced by a mural or other permanent public art.*
- *BFD-5. Place, proportion, and design windows to contribute to a coherent and appealing composition, add architectural interest, and differentiate the various components and uses of the building (e.g., ground floor retail spaces, lobbies, office suites, or residential units).*
- *BFD-6. Include acoustically rated windows and doors featuring higher Sound Transmission Class ratings to reduce exterior noise in structures with noise sensitive land uses. Retrofit existing structures with the same treatments.*
- *BFD-7. Satisfy at least ONE of the following conditions on any flat roof element (defined as having a slope less than 10 percent) on all new structures or enlargements:*
 - *The flat roof element is designed as an architectural/landscape amenity to enhance the views from the proposed structure or adjacent structures. Such enhancement may consider roof gardens, architectural features, special pavings and patterns, or other comparable treatment.*
 - *Up to 40 percent of a building's coverage can be a single flat roof element, with separate elements differentiated by a minimum 5 foot change in elevation.*
 - *A minimum of 40 percent of the flat roof element is designed structurally and architecturally to accommodate outdoor activities.*
 - *A minimum of 40 percent of the flat roof element contains solar panels.*
 - *The flat roof is over a parking structure that complies with Land Development Code Chapter 14, Article 2, Division 5.*
- *BFD-8. Identify the pedestrian and bicycle routes to and from Trolley stations and the San Diego River with wayfinding signage. Place signs and other public facilities in a manner that provides a clear, unobstructed pedestrian path and continuous parkway design. Signage should be submitted for review for compliance with one of the following:*
 - *One vertical way-finding sign should be provided per 100 feet of street-facing building façade. Examples of vertical wayfinding signage include permanent banners, traditional sign posts, plaques, or vertical wayfinding signage in the pedestrian zone; or*
 - *One horizontal way-finding sign should be provided per 100 feet of street facing building façade. Examples of horizontal way-finding include specialized paving patterns or inset arrows along adjacent public rights-of-way, private streets, or private drives.*

Composition: Building Placement and Orientation

Future development in Mission Valley should be designed in a manner that engages public streets and neighboring development.

- *BPO-1. Begin site design by locating the point on the site providing the best access to high-quality transit. Radiate the site design from that point, where all buildings have the most direct pedestrian access possible to that point.*

- *BPO-2. Articulate building mass and surfaces with three-dimensional elements that reduce apparent bulk and create visual interest. Building design should include features such as balconies, recesses, projections, varied finishes, transparency, signage, reveals, brackets, cornices at the roof and at the top of the ground floor, and piers at corners and structural bays.*
- *BPO-3. Face entrances to buildings to the street providing primary access, and establish a direct pedestrian connection between the sidewalk and the primary entry.*
- *BPO-4. Proportion doorways, windows, and other openings to reflect pedestrian scale and movement and to encourage interest at the street level.*
- *BPO-5. Activate ground floor uses and, where possible, make transparent to engage pedestrians and create a livelier environment. Ground floor activation, such as storefronts, dining areas, lobbies, and offices should occur on all streets designated as "Potential Main Street" in the Urban Design section of this plan.*
- *BPO-6. Orient buildings, whenever possible, to create a community gathering place such as an outdoor cafe area, community garden, park, plaza, or public art installation.*
- *BPO-7. Design site plans to encourage interaction among occupants and passersby. Buildings and entrances should be located and configured to define the edges of open spaces and provide visibility and accessibility of open spaces from public rights-of-way and pedestrian pathways.*
- *BPO-8. Conceal all mechanical, electrical, and other building equipment from the public right-of-way and from other existing buildings. Minimize noise and visual impacts with screening materials, landscaping and other buffers. Locate mechanical equipment away from ground floor primary frontage.*

Composition: Parking

Parking for development should be suitable for an urban environment.

- *PRK-1. Encourage shared parking agreements and use of technology to optimize the efficiency of existing and future parking supplies and reduce the burden on future development.*
- *PRK-2. Consider unbundled parking to offset development costs and encourage use of alternative transportation modes on development.*
- *PRK-3. Consider applying the Parking Standards for Transit Priority Areas (TPA) on development.*
- *PRK-4. Consider designating priority parking spaces for electric vehicles and zero emissions vehicles on development.*
- *PRK-5. Locate parking areas to the side or rear of buildings, away from the public right-of-way and outside of primary frontages.*
- *PRK-6. Distribute parking areas throughout a development site to avoid large contiguous parking areas and to integrate landscaping. Each parking area should include no more than 30 percent of the development's parking spaces.*
- *PRK-7. Make pedestrian access to parking areas fully accessible, visible, and free of obstructions to ensure safety and minimize conflicts between pedestrians, bicycles, and vehicles.*
 - *Connect parking areas with adjoining streets and with all primary buildings on site.*
 - *Construct walkways at the shortest practical distance between the building entry and the sidewalk.*

- Differentiate where a walkway crosses a parking area, aisle, or driveway with paving materials, a change in elevation, and/or speed humps.
- PRK-8. Encourage a minimum of 10 percent landscaping of the parking lot area.
- PRK-9. Locate loading and service areas off the public right-of-way and screen with masonry walls, landscaping, or architectural elements. Design loading/service areas to avoid creating concealed hiding places.
- PRK-10. Locate bicycle parking near building entrances and exits, and ensure it is secured, weather protected, and illuminated with adequate lighting.
- PRK-11. Design structured parking as an integral part of the development it serves, consistent in style and materials with the rest of the development.
- PRK-12. Design partially below-grade parking structures to be a maximum of four feet above the adjacent sidewalk grade, and screen the exposed portion with landscaping and/or design elements that are architecturally consistent in design with and that complement the rest of the building.
- PRK-13. Provide garage or tuck-under parking access from side streets or rear alleys.

Land Use: Commercial Development

Future development in Mission Valley should contribute to the thriving commercial center while offering new formats to meet changing business and consumer needs.

- COM-1. Design commercial development with a “Main Street” feel, providing building doors and access to open space areas directly from the street, or primary pedestrian path if adequate street frontage is unavailable.
- COM-2. Distinguish and accentuate the ground floor of buildings through facade articulation and transparency of building function/program.
- COM-3. Design street-facing storefronts to create an active and inviting pedestrian realm.
 - In one retail structure with several stores, define individual storefronts by providing variations in facades, such as shallow recesses at entries, piers, or other architectural elements, to create the appearance of several smaller buildings or shops, rather than a single, large, and monotonous building.
 - Complete storefront facades should include doors, large display windows, bulkheads, signage areas, and awnings.
- COM-4. Design building entries so that they are clearly defined and distinguishable from the street and pedestrian paths. Building entries should include at least one of the following design features: entry plaza, vertical articulation, or architectural elements such as a recessed entry, awnings canopy, or portico.
- COM-5. Locate the primary entrances for both first-floor establishments and upper level units within the primary façade and make them visible and accessible from the street.
- COM-6. Site nearly all parking serving commercial development behind any buildings facing the primary street. Large parking fields in front of buildings are not permitted.
- COM-7. Provide for the privacy and noise attenuation of adjacent homes on any commercial development sited adjacent to residential development.

- *COM-8. Design office development to accommodate changes in workforce styles and needs. Office uses should be developed within high-quality office districts where workers have access to restaurants, services, and outdoor recreation.*
- *COM-9. Prohibit drive-throughs within strictly commercial sites; they can be designed as an integrated part of a mixed use development.*
- *COM-10. Design car dealerships to be contained within buildings in an urban format, with limited parking fields and car storage through the use of structured parking.*
- *COM-11. Provide goods and services needed for local residents and employees at retail establishments unless placed on a site designated for Regional Retail services.*
- *COM-12. Design all commercial development to be accessible by all modes of travel. Connect all primary entrance doors to a primary pedestrian path with limited conflict points with automobiles.*

Land Use: Mixed Use Development

Future mixed use development in Mission Valley should be developed in an urban format where uses are functionally integrated and designed to be compatible with the unique nature of Mission Valley.

- *MXU-1. Demonstrate consistency with the policies identified for residential or commercial development needs on mixed use developments.*
- *MXU-2. Strive to facilitate no net loss of jobs on a mixed use development that is proposed on a previously all commercial site, while increasing opportunities for housing. Encourage units that integrate job opportunities such as live/work, shopkeeper, and home occupation.*
- *MXU-3. Design mixed use development in either a horizontal or vertical format as long as all uses are functionally integrated with unobstructed pedestrian paths with limited automobile conflict points between all uses.*
- *MXU-4. Prioritize employment uses in mixed use sites adjacent to transit stops and stations to promote transit ridership.*
- *MXU-5. Locate commercial uses such that they are not disruptive to residential uses.*
- *MXU-6. Locate the primary entrances for both first-floor establishments and upper level office or residential units in mixed-use buildings within the primary façade and make them visible and accessible from the street.*
- *MXU-7. Use a high degree of transparency on primary, ground floor, non-residential frontages of a building. However, if a residential use is included, it should be activated through stoops to engage pedestrians and create a livelier street environment. On secondary frontages, activation is not required but buildings should be well-articulated to create visual interest for pedestrians.*
- *MXU-9. Design mixed use development to provide for the needs of children through amenities and open areas. Consider the siting of childcare facilities to meet on site commercial requirements.*

Land Use: Residential Development

Future housing development in Mission Valley should provide diversity in type and format in order to meet the needs of many demographics.

- *RES-1. Encourage the development of a variety of building formats to provide functional and visual diversity of housing options throughout the community.*
- *RES-2. Use development to achieve a diverse mix of unit sizes and types, such as three-bedroom, shopkeeper, home occupations, residential-work units, and micro-units, to accommodate many lifestyles and family sizes.*
- *RES-3. Provide housing options that can be comfortably occupied by seniors, including units without internal staircases and limited stairs on external paths.*
- *RES-4. Encourage affordable housing to be built on site.*
- *RES-5. Design any residential development built within 500 feet of a freeway to minimize the exposure of freeway noise, including siting buildings and balconies perpendicular to the freeway, and using parking structures to shield units from noise.*
- *RES-6. Face primary entrances for residential units (individual or shared) towards either a public street or a main street that is internal to the development if adequate public frontage does not exist. Entrances should provide a connection to the main vehicular street through stoops, a pathway, porches, or other transitional features.*
- *RES-7. Make security gating or fencing a minimum of 50 percent transparent to provide views into the courtyard. Any gating and/or fencing may be used to demarcate private areas, but public pedestrian connectivity needs to be maintained with pass-throughs to prevent the creation of mega-blocks.*
- *RES-8. Design open spaces to enhance the quality of life for residents. Areas may be small, but should be adequately sized to allow movement and usability. Such areas may include balconies, decks, and patios. For larger units, the areas should be designed with consideration for the needs of families with children.*

Mobility: Bicycling

Future development in Mission Valley should be designed to be accessed by cyclists and include amenities to support bicycle use.

- *BIC-1. Provide a sheltered Bike Kitchen—a place to use tools and repair bicycles—within development required to build 10 long-term bicycle parking spaces.*
- *BIC-2. Ensure bicycle parking is provided in a visible, well-lit area.*
- *BIC-3. Identify ingress and egress for bicycles, with minimum interaction with vehicles on access plans for development.*
- *BIC-4. Connect development to bicycle trails and routes per the San Diego Regional Bicycle Plan. Locate open spaces to abut or provide direct access to bicycle facilities.*

Mobility: Streets

Development in Mission Valley should contribute to a better functioning street system.

- *STR-1. Provide a well-connected grid of internal streets and ample provisions for pedestrian and bicycle mobility on development.*
- *STR-2. Support the buildout of the planned roadway network and associated classifications depicted in Table 3 of the Mission Valley Community Plan and Figure 14 of the Mission Valley*

Community Plan on development, which may include the allocation of right-of-way to support a complete multimodal network; this includes critical connections and some strategic widenings.

- *STR-4. Include all pedestrian amenities required of public streets, consistent with the City of San Diego Street Design Manual, on any development that includes private drives that provide ingress and egress to a site.*
- *STR-5. Include new local roads identified in the Mobility section as part of redevelopment.*

Mobility: Transportation Demand Management (TDM)

Future development in Mission Valley should be designed to promote internal walkability as well as connectivity to and from other destinations in the community.

- *TDM-1. Evaluate opportunities to coordinate community circulator routes with neighboring properties as a TDM measure that expands service and access to more community destinations.*
- *TDM-2. Consider developing and implementing an approved TDM Plan designed to reduce peak period automobile use and lower the minimum parking requirement on development. Reference San Diego Municipal Code Chapter 14, Article 2, Division 5.*
- *TDM-3. Incorporate mobility hub features such as EV chargers, rideshare pick-up/drop-off space, bicycle parking, and transit information on development.*
- *TDM-4. Designate visible space along the property frontage of development to allow for staging of shared vehicles, bikes, and scooters.*
- *TDM-5. Consider participating in existing TDM programs, including but not limited to those overseen by SANDAG and MTS, in order to:*
 - *Encourage rideshare and carpool for major employers and employment centers.*
 - *Promote car/vanpool matching services.*
 - *Continue promotion of SANDAG's guaranteed ride home for workers who carpool throughout Mission Valley.*
 - *Provide flexible schedules and telecommuting opportunities for employees.*
- *TDM-6. Provide flexible curb space in commercial/retail and residential areas on development to meet the needs of shared mobility services and the changing demands of users.*
- *TDM-7. Post information related to available transit service and bicycle infrastructure on development to encourage the use of alternative transportation modes.*
- *TDM-8. Consider providing "parking cash out" options to employees—option for employees to receive the cash value of employer-paid parking subsidies in lieu of a parking spot—as an alternative to providing free or subsidized parking or transit passes.*

Mobility: Transit

Development in Mission Valley should be transit-oriented, and development adjacent to transit stops needs to be designed to help promote transit use.

- *TRN-1. Support transit stations/bus stops near development by providing access that is visible, convenient, and comfortable to all residents and/or tenants.*
- *TRN-2. Design surrounding areas on development that are directly adjacent to transit stops to support a safe and comfortable waiting experience.*

- *TRN-3. Provide wayfinding signage to guide pedestrians from within a development to a transit stop.*

Mobility: Walkability

Future development in Mission Valley should be designed to promote internal walkability as well as connectivity to and from other destinations in the community.

- *WLK-1. Designate public access easements on development that are consistent with the planned paseos identified in Figure 5 of the Mission Valley Community Plan.*
- *WLK-2. Include adequate lighting for pedestrian and cyclist safety and comfort on pedestrian and bicycle connections, particularly along freeway and bridge underpasses, and along the San Diego River Trail.*
- *WLK-3. Provide shade-producing street trees and street furnishing near schools and transit stops on development.*
- *WLK-5. Include a publicly accessible through-block connection to provide access to the San Diego River Trail on development adjacent to the San Diego River, consistent with the requirements of the San Diego River Park Master Plan.*

Parks: Park Development, Improvements, and Expansions

As Mission Valley continues to grow, development should help contribute to the provision of new park and recreation amenities.

- *PDI-1. Locate public parks on development, where feasible.*
- *PDI-2. Follow park improvement and expansion standards set forth in Council Policy 600-33 and 600-11.*
- *PDI-3. Satisfy population-based park requirements for any proposed portion of a private development by:*
 - *Not restricting or limiting the use of the park or facility to any person because of race, religion, or creed, or limit availability of the park or facility for the use of the general public.*
 - *Being permanent. This would mean that the development has an estimated useful life equivalent to that of similar installations on City-owned and developed parks.*

Parks: Public Open Space on Private Development

Recreational amenities should be provided within private development. In order to receive population-based park credit, a recreation easement must be placed on the site.

- *POD-1. Calculate park acreage based on "usable acres" as defined in the General Plan Glossary.*
- *POD-2. Locate open spaces so they are physically and visually accessible from the sidewalk and visible from the street.*
- *POD-3. Locate publicly-accessible open space at the ground floor near the center of activity nodes or along pedestrian connections to facilitate pedestrian access and encourage a variety of spillover activities.*
- *POD-4. Orient and design publicly accessible open space to maximize comfort and provide refuge from the heat during summer months.*

- *POD-5. Provide a variety of areas with sun, shade, and pedestrian-scaled lighting.*
- *POD-6. Use landscaping and architectural components to define publicly accessible spaces and express neighborhood identity.*
- *POD-7. Offer a range of seating and activity options, including children's play equipment and pet relief areas.*
- *POD-8. Ensure indoor publicly accessible open spaces are visible from streets; have tall ceilings and glazing to allow natural light; provide opportunities for seating and public art display; and be free of private logos, signs, or markings.*
- *POD-9. Coordinate seating, planting, and building entries to create areas for groups and individuals.*
- *POD-10. Provide wayfinding signage that conveys a welcoming message to the public.*

Parks: Private Open Space Development

Ample open spaces should be encouraged to be included on site as part of private development, even if access is restricted to residents and employees.

- *PSD-1. Allow for public, semi-public, and private spaces through site-design that incorporates variation in scale.*
- *PSD-2. Define "private" spaces with visual cues such as fences, walls, hedges, trees, and buffer plantings.*
- *PSD-3. Activate and populate private open spaces through successful programming with other uses. This could be achieved through adjacency to outdoor seating of a café or live events.*
- *PSD-4. Incorporate elements into communal areas that encourage social interactions between residents through community gardens, pavilions, "Little Lending Libraries", or other elements.*
- *PSD-5. Compose exterior usable open area of moderately level land with a gradient of less than 10 percent.*
- *PSD-6. Design usable open area as gardens, courtyards, terraces, roof-decks, recreation facilities; swimming pools and spas with associated decking; private exterior balconies; lawns or other landscaped areas beyond required setbacks; and walkways or pathways not subject to vehicular access. Usable open space should not be located within required setbacks.*
- *PSD-7. Ensure usable open area is a minimum of 6 feet in each dimension (width and length).*

Parks: Development Adjacent to Open Space

When development is proposed adjacent to existing open space, the following approaches should be considered.

- *AOS-1. Maintain contiguous public access immediately adjacent to the open space edge or boundaries.*
- *AOS-2. Prohibit parking contiguous to the open space boundary.*
- *AOS-3. Utilize on site open space and/or accessible pathways to buffer buildings from adjacent open space when siting development.*
- *AOS-4. Abut the open space boundary with common spaces.*

- AOS-5. Provide open space linkages, trail heads, and bike/pedestrian access on development. All access points to the canyon hillsides and open spaces should be visible and clearly marked.
- AOS-6. Incorporate landscaping that complements the existing open space plant palette to serve as a visual extension of the open space on development.
- AOS-7. Follow the City's MHPA Land Use Adjacency Guidelines, which address indirect effects on the MHPA from adjacent development, on development adjacent to MHPA lands. Follow all Land Use Adjacency Guidelines, especially the guidance on grading and land development including drainage, toxic substances in runoff, lighting, barriers, invasive plant species, brush management, and noise.

Resource Protection: Open Space

Some areas of Mission Valley have been designated as Open Space to provide areas that allow for resource protection, particularly of riparian habitats and hillsides.

- OSP-1. Provide for water storage in open space after rain events as long as resource protection is not inhibited.
- OSP-2. Develop trails within areas designated for open space as long as the beneficial uses, functions, and values of the area are not compromised.

Resource Protection: Historic Preservation

Development should identify, preserve, and appropriately treat the significant Tribal Cultural and prehistoric and historic archaeological resources of Mission Valley; consider the history of the built environment; and identify and preserve historically significant resources.

- HSP-1. Conduct project-specific investigations in accordance with all applicable laws and regulations to identify potentially significant tribal cultural and archaeological resources.
- HSP-2. Conduct project-specific Native American Kumeyaay consultation early in the development review process to ensure culturally appropriate and adequate treatment and mitigation for significant archaeological sites or sites with cultural and religious significance to the Native American Kumeyaay community in accordance with all applicable local, state, and federal regulations and guidelines.
- HSP-3. Ensure adequate data recovery and mitigation for adverse impacts to archaeological and Native American Kumeyaay sites as part of development; including measures to monitor and recover buried deposits from the tribal cultural, archaeological, and historic periods, under the supervision of a qualified archaeologist and a Native American Kumeyaay monitor.
- HSP-4. Consider eligible for listing on the City's Historical Resources Register any significant archaeological or Native American Kumeyaay cultural sites that may be identified as part of future development within Mission Valley, and refer sites to the Historical Resources Board for designation, as appropriate.

Sustainability: Green Building Practices

Development in Mission Valley should help contribute to a more sustainable future for the community.

- *GBP-1. Encourage the use of sustainable building practices. Buildings should strive to qualify for LEED accreditation.*
- *GBP-2. Building heat gain should be reduced through at least three of the following measures:*
 - *Orient buildings to minimize east and west facing facades.*
 - *Configure buildings in such way as to create internal courtyards to trap cool air while still encouraging interaction with streets and open spaces.*
 - *Design deep-set fenestration on south facing facades and entries.*
 - *Utilize vertical shading and fins on east and west facing building facades.*
 - *Using horizontal overhangs, awning or shade structures above south facing windows to mitigate summer sun but allow winter sun. Encourage overhang width to equal half the vertical window height to shade the window from early May to mid-August but still allowing the winter sun.*
 - *Install high vents or open windows on the leeward side of the buildings to let the hottest air, near the ceiling, escape.*
 - *Create low open vents or windows on the windward side that accepts cooler air to replace the hotter air.*
 - *Include high ceiling vaults and thermal chimneys to promote rapid air changes and to serve as architectural articulation for buildings.*
- *GBP-3. Consider the solar access of neighboring buildings to the maximum extent practical, so as not to inhibit neighboring solar access.*

Sustainability: Smart Cities

Development should support the City of San Diego's efforts to become a Smart City.

- *SMC-1. Consider providing priority parking and charging stations (preferably solar) to promote sustainable practices and accommodate the use of Electric Vehicles (EVs), including smaller short-distance neighborhood electric vehicles.*
- *SMC-2. Consider lighting with adaptive controls for energy efficiency and to minimize light pollution.*
- *SMC-3. Install and dedicate appropriate communications infrastructure to run from a connection point in a building to the lot line adjacent to a public right-of-way where there exists or may exist in the future a fiber optic broadband network.*

Well-being: Emergency Access and Incident Prevention

Development in Mission Valley should be developed to allow for easy emergency access by first responders. Sites should also be designed to discourage public safety incidents.

- *EAI-1. Ensure that building siting and designs provide for adequate emergency access on development and redevelopment.*
- *EAI-2. Design and develop sites to minimize the likelihood of a wildfire spreading to structures by managing flammable vegetation within a development.*
- *EAI-3. Use a point-based system with coordinate locations as opposed to a system that is centerline-based on large-scale developments that include a new addressing system.*

- *EAI-4. Share emergency access lanes between developments as long as the shared lane provides the same level of access as two individual lanes, or gaps can be mitigated through other emergency access points.*
- *EAI-5. Minimize the number of curb cuts and other intrusions of vehicles across sidewalks to reduce conflict points and promote pedestrian and cyclist safety.*

Well-being: Noise

Development in Mission Valley should make every attempt to mitigate noise exposure to residents and workers.

- *NOI-1. Include building design techniques that address noise exposure and the insulation of buildings to reduce interior noise levels to acceptable limits on development within 500 feet of the freeway. Methods may include, but are not limited to, forced-air ventilation systems, double-paned or sound rated windows, sound insulating exterior walls and roofs, and attic vents.*
- *NOI-2. Include site planning techniques to help minimize exposure of noise sensitive uses to rail corridor and trolley line noise on a development.*

Well-being: Geologic and Seismic Hazard Prevention

Development on sites seismic disturbance needs to mitigate for risks to reduce the possibility of exposure.

- *GSH-1. Mitigate adverse effects of ground shaking through ground improvement and/or the use of proper engineering design.*
- *GSH-2. Remove and replace vulnerable soils with compacted fill, if structures are planned in vulnerable soil areas, to mitigate the potential of soil settlement.*
- *GSH-3. Employ mitigation to avoid surface ruptures caused by faulting from the nearest Rose Canyon Fault, including but not limited to, setting back structures for human occupancy away from the surface trace of clearly-defined faults or through foundation design that mitigates surface fault rupture.*
- *GSH-4. Consider removing loose soils and replacing them with compacted fill to reduce liquefaction; using support structures with deep foundations, which extend through liquefiable materials; or using suitable ground improvement techniques such as stone columns or deep dynamic compaction.*
- *GSH-5. Practice avoidance, removal of the deposits, or geotechnical and/or structural engineering to mitigate the potential of landslides.*

Well-being: Flooding and Sea Level Rise

Future development in Mission Valley must conform with all federal, state, and local regulations to limit exposure from flooding due to storm events or sea level rise.

- *FSR-1. Incorporate best management practices (BMPs), on development that address storm water runoff from the development area using the most current regulations established by the Regional Water Quality Control Board.*
- *FSR-2. Conform development and redevelopment to current federal, state, and local flood proofing standards and siting criteria to prevent San Diego River flow obstruction.*

5.1.2.5 Levi-Cushman Specific Plan

The site is currently included within the approved Levi-Cushman Specific Plan. As described in Section 2.4.3, The Levi-Cushman Specific Plan identifies the project site for a mix of residential, retail, office, hotel, and recreational uses. (See Figure 2-8, *Levi-Cushman Specific Plan Land Use Map*.) Much of the housing and neighborhood commercial uses approved with the Levi-Cushman Specific Plan were planned to be located on the north side of the San Diego River, with office and hotel development sited on the south side of the river. Central to the Levi-Cushman Specific Plan was the creation of a 12-acre island along the southern edge of the San Diego River to accommodate small-scale specialty retail, office, and residential uses. In total, the Levi-Cushman Specific Plan allows for 1,329 residential dwelling units; 1,000 hotel rooms; 200,000 square feet of retail; 2,582,000 square feet of office; and a minimum of 75 acres of open areas, including the San Diego River, the river buffer, parks, setbacks, hiking/biking/walking trails, theme entries, plazas, and privately maintained open areas within each parcel. The Levi-Cushman Specific Plan remains applicable to the site until it is rescinded.

5.1.2.6 Zoning

Zoning for the Specific Plan area is governed by the City's Land Development Code. Per the Mission Valley Community Plan, the Specific Plan area is zoned CC-3-9 (Commercial—Community) in the central, northeastern, and southeastern portions of the site; RM-4-10 (Residential—Multiple Unit) in the northwestern and northeastern portions of the site; OP-1-1 (Open Space—Park) in the central portion of the site, and OC-1-1 (Open Space – Conservation) in the central portion of the site surrounding the San Diego River (see Figure 2-9, *Existing Zoning*).

The purpose of the CC zones is to accommodate community-serving commercial services, retail uses, and limited industrial uses of moderate intensity and small to medium scale. The CC-3-9 zone is intended to accommodate development with a high intensity, pedestrian orientation and permits a maximum density of one dwelling unit for each 400 square feet of lot area.

The purpose of the RM zones is to provide for multiple dwelling unit development at varying densities. Specifically, the RM-4-10 zone permits urbanized, high density multiple dwelling units with limited commercial uses and a maximum density of one dwelling unit for each 400 square feet of lot area.

The purpose of the OP zones is to be applied to public parks and facilities in order to promote recreation and facilitate the implementation of land use plans. The OP-1-1 zone allows developed, active parks.

The purpose of the OC zone is to protect natural and cultural resources and environmentally sensitive lands. It is intended that the uses permitted in this zone be limited to aid in the preservation of the natural character of the land, thereby implementing land use plans.

In addition to the base zones, a CPIOZ is applied within the boundaries of the Levi-Cushman Specific Plan area (per Chapter 13, Article 2, Division 14 of the Municipal Code) to provide supplemental development regulations that are tailored to implement the vision and policies of the Mission Valley Community Plan.

The Mission Valley Community Plan includes a CPIOZ with three subdistricts. The CPIOZ is *applied within the boundaries of the Mission Valley Community Plan [...] to provide supplemental development regulations that are tailored to implement the vision and policies of the Mission Valley Community Plan.* All of the Mission Valley Community Plan CPIOZs are CPIOZ-Type A. *[A]ny development permit application within the boundaries of CPIOZ-Type A that complies with the supplemental development regulations can be processed ministerially. Any development permit application within the boundaries of CPIOZ-Type A that does not comply with the supplemental development regulations requires a Process Three Site Development Permit.*

The Specific Plan area is within the Specific Plan Subdistrict CPIOZ-Type A and the San Diego River Subdistrict CPIOZ-Type A. *The purpose of the Specific Plan Subdistrict CPIOZ-Type A regulations is to identify properties where a valid specific plan has been adopted by ordinance or a specific plan adopted by ordinance is required for future development. Applications for a CPIOZ-Type A development shall meet the regulations outlined within the corresponding specific plan.* The overlay zone supersedes the base zones. Therefore, any development proposed for the site would need to be consistent with the land use plan, densities, and intensities described in the Levi-Cushman Specific Plan to be processed ministerially. Any other development program, even one consistent with the base zones, would require discretionary approval.

The purpose of the San Diego River Subdistrict CPIOZ-Type A regulations is to ensure that development along the San Diego River implements the San Diego River Park Master Plan. The River Subdistrict regulations have also been designed to preserve and enhance the character of the San Diego River Valley, to provide for sensitive rehabilitation and redevelopment, and to create the San Diego River Pathway. The San Diego River Subdistrict CPIOZ includes the River Corridor Area and the River Influence Area. The regulations of this zone apply to any development fully or partially within these boundaries.

5.1.2.7 City of San Diego Environmentally Sensitive Lands Regulations

Chapter 14, Article 3, Division 1 of the LDC contains ESL Regulations. The purpose of the regulations is to *protect, preserve and, where damaged, restore the environmentally sensitive lands of San Diego and the viability of the species supported by those lands.* Environmentally sensitive lands are defined as Sensitive Biological Resources, Steep Hillside, Coastal Beaches, Sensitive Coastal Bluffs, and Special Flood Hazard Areas. The ESL Regulations apply to all proposed development on a premises where environmentally sensitive lands are present.

With regard to flood hazard areas, the ESL Regulations contain restrictions relative to the floodway and flood fringe, intended to provide reasonable flood protection for regulatory purposes. Within

the floodway, no structures may be attached to a foundation, development must be offset by other improvements to enable the passage of the base flood, and channelization is subject to a number of requirements. Within the flood fringe, permanent structures, roads, and other development may be allowed, provided that they meet applicable conditions. See Sections 5.12, *Hydrology*, and 5.14, *Water Quality*, for discussion of project compliance with applicable drainage requirements.

Portions of the site contain sensitive biological resources and special flood areas and 100-year floodplains

Impacts to wetlands require deviations from the City's ESL wetland regulations. Deviations from the wetland regulations shall not be granted unless the development qualifies to be processed as one of these three options: Essential Public Projects Option (EPP), Economic Viability Option (EVP), and Biologically Superior Option (BSO).

5.1.2.8 City of San Diego Multiple Species Conservation Program Subarea Plan/Multi Habitat Planning Area

The MSCP is a comprehensive plan that preserves a network of habitat and open space in the region and ensure viability of upland habitat and species, while still permitting some level of continued development. The MSCP identifies a MHPA in which the permanent MSCP preserve will be assembled and managed for its biological resources. In accordance with the MSCP, the City has developed a Subarea Plan to implement the MSCP and habitat preserve within the City of San Diego. The project site is within the City's MSCP Subarea and contains MHPA land (the San Diego River and river channel) (Figure 2-13, *MHPA Exhibit*). Development adjacent to the MHPA must ensure that indirect impacts into the MHPA are minimized. The City's Subarea Plan outlines the requirements to address indirect effects related to drainage and toxics, lighting, noise, public access, invasive plant species, brush management, and grading/land development as part of Section 1.4.3 MHPA Land Use Adjacency Guidelines (LUAGs). The project site includes areas within and adjacent to the MHPA; therefore, conformance with the LUAGs would be required.

According to the City's MSCP Subarea Plan, the project site is an urban habitat area that includes the San Diego River in the MHPA (see Figure 5.4-1, *City of San Diego MHPA and Regional Corridor*). The Subarea Plan lists MHPA Guidelines for the San Diego River that are required to be implemented for take authorization of Covered Species. Guideline B15 is required to be met by the project and states: *Native vegetation shall be restored as a condition of future development proposals along this portion of the San Diego River Corridor.*

5.1.2.9 San Diego Forward: The Regional Plan

The RP provides a vision for the region based on smart growth and sustainability. A key implementation action of the RP has been the development of a Smart Growth Concept Map

illustrating the location of existing, planned, and potential smart growth areas. The *SANDAG Smart Growth Concept Map* (Figure 5.1-2), which was most recently updated in 2016, identifies an Existing/Planned Town Center potential on the project site. Town Centers are areas identified as suburban downtowns within the region that may include low- and mid-rise residential, office, and commercial buildings with some employment uses. These areas draw in people from the immediate area and are served by corridor/regional transit lines and local services or shuttle services.

5.1.2.10 Airport Land Use Compatibility Plans

The project site is within the AIAs for the Montgomery Field and San Diego International Airport ALUCPs. The basic function of ALUCPs is to promote compatibility between airports and the land uses that surround them to the extent that these areas are not already devoted to incompatible uses. In San Diego County, the ALUCPs are administered by the San Diego County Regional Airport Authority (SDCRAA), as provided in Section 21670.3 of the California Public Utilities Code.

Montgomery Field ALUCP

The northeastern portion of the project site is within the Airport Influence Area Review Area 2 and Part 77 Airspace Protection Height Notification Boundary for the Montgomery Field ALUCP. As such, the project is required to obtain a Federal Aviation Administration (FAA) Part 77 Notice of Determination letter. The project site is outside of all other Montgomery Field policy maps, which include Noise, Safety, Part 77 Airspace Protection, Overflight, and Avigation Easement and Overflight Notification Areas.

San Diego International Airport ALUCP

The project site is within the Airport Influence Area, Review Area 2, Airspace Protection Boundary, and Overflight Area Boundary for the San Diego International Airport ALUCP. The project site is outside of the Noise Contour, Safety Zone, ALUCP Impact Area, and Airport Approach Overlay Boundary policy maps. The project site is within the Airspace Protection Boundary, but outside of the FAA Part 77 Surfaces. As such, the project is not required to obtain an FAA Part 77 Notice of Determination letter for San Diego International Airport.

5.1.3 Impact Analysis

5.1.3.1 Issue 1

Issue 1 Would the project result in a conflict with the environmental goals, objectives, and recommendations of the community plan in which it is located?

Impact Thresholds

According to the City's Significance Determination Thresholds, an *inconsistency with a plan is not by itself a significant environmental impact; the inconsistency would have to relate to an environmental issue*

(i.e., cause a direct or indirect physical change in the environment) *to be considered significant under CEQA*. Land use policy impacts may be significant if a project would be:

- *Inconsistent or conflict with an adopted land use designation or intensity and result in indirect or secondary environmental impacts;*
- *Inconsistency/conflict with the environmental goals, objectives, or guidelines of a Community Plan or General Plan; or*
- *Substantial incompatible with an adopted plan.*

Analysis

City of San Diego General Plan

Section 5.1.2.1, above, presents the relevant goals and policies of the City of San Diego General Plan for the project. Table 5.1-1, *General Plan Analysis*, includes the previously identified goals and policies and a discussion relative to the project's consistency with the respective goals and policies.

As analyzed in Table 5.1-1, the project would be consistent with the City of San Diego General Plan. The project would support the City of Villages strategy in that it would develop a mix of employment, retail, and residential opportunities within a mixed-use village that is walking distance to high-quality transit including a new transit stop on-site and the adjacent Fashion Valley Transit Center. The project would be supportive of active transportation with proximity to local pedestrian circulation facilities and regional bicycle transportation. Architecturally, the project would provide in-fill development that is sensitive to the character and quality of the existing neighborhood, while creating a distinct identity on-site. The project would provide on-site recreational opportunities for residents, employees, and visitors, and would implement sustainable design and operation strategies.

Relative to the Noise Element of the General Plan, a noise study has been prepared that indicated noise levels at all residential receivers on-site modeled exceed the 65-A-weighted decibel (dBA) compatibility criteria identified in the City of San Diego General Plan (Table 5.1-4). As shown in Table 5.1-4, *Land Use-Noise Compatibility Guidelines*, the City's exterior noise level for multi-family residences should not exceed 70 dBA community noise equivalent level (CNEL). However, the Motor Vehicle Traffic Noise section of the Noise Element of the City's General Plan, provides that, *although not generally considered compatible, the City conditionally allows multiple unit and mixed-use residential uses up to 75 dBA CNEL in areas affected primarily by motor vehicle traffic noise with existing residential uses. Any future residential use above the 70 dBA CNEL must include noise attenuation measures to ensure an interior noise level of 45 dBA CNEL and be located in an area where a community plan allows multiple unit and mixed-use residential uses.* As demonstrated by the noise monitoring results, the project site is not exposed to noise levels above 73.0 dBA, below the City's 75 dBA threshold for multiple unit residential and mixed-use developments affected primarily by motor vehicle noise. Therefore, the project would be consistent with the Noise Element of the General Plan.

Additionally, relative to the project's interface with I-8 at the southern boundary, any future residential development that may occur in the South District is constrained by Riverwalk Specific Plan regulation Reg-194, which states *No residential balconies shall front I-8 in areas that exceed an exterior noise level of 70 dBA CNEL*. This regulation further minimizes future residential exposure to excessive noise levels.

Exterior noise levels at offices and retail establishments of 65 to 75 dBA are conditionally compatible with the General Plan provided interior noise levels can be attenuated to 50 dBA or less. Exterior noise levels at parks or other outdoor recreation areas are compatible up to 70 dBA and conditionally compatible up to 75 dBA. With implementation of construction techniques and materials consistent with California Energy Code Title 24 requirements, interior noise levels at retail and office buildings would be below 50 dBA; and thus, consistent with the General Plan. Park areas are expected to remain at approximately 60 dBA, which is below the 75-dBA compatibility threshold identified in the General Plan. The project would be consistent with the City of San Diego General Plan Noise Element. (See discussion under Issue 6, below.)

City of San Diego Climate Action Plan

The project's GHG emissions analysis is included in Section 5.9, *Greenhouse Gas Emissions*. An assessment of the Specific Plan's conformance with the CAP was conducted through the CAP Conformance Evaluation (Appendix C1). The CAP Conformance Evaluation determined that the Riverwalk Specific Plan would be in conformance with the CAP. The project would implement the General Plan's City of Villages Strategy in a Transit Priority Area (TPA) by increasing the capacity for transit-supportive residential and employment densities. The project's land use and zoning would provide capacity for transit-supportive residential densities within a TPA and for transit-supportive employment by creating 1,152,000 combined square feet of employment uses (1,000,000 square feet employment use and 152,000 square feet of commercial use), which would increase the number of jobs within the TPA. Development of the Riverwalk project would be consistent with an Urban Village, defined by the General Plan as a land use that *[s]erves the region with many types of uses, including housing, in a high-intensity, mixed-use setting. Integration of commercial and residential use is emphasized; larger, civic uses and facilities are a significant component. Uses include housing, business/professional office, commercial service, and retail*. Riverwalk would provide for a high-intensity, mixed-use project that integrates residential, commercial, employment, and recreational uses within a TPA, consistent with the Mission Valley Community Plan. The Riverwalk Specific Plan includes accompanying implementation regulations to facilitate achievement of the Riverwalk's densities and intensities. The Specific Plan includes targets for residential density (4,300 units at a zoning designation that allows up to 109 du/ac) and non-residential intensity (152,000 square feet of commercial use and 1,000,000 square feet of employment uses), consistent with the Mission Valley Community Plan.

Furthermore, the Riverwalk Specific Plan would implement the General Plan's Mobility Element in a TPA to increase transit use, and would provide a new transit stop for the Green Line Trolley, which

would include a trolley stop and mobility hub. The Specific Plan would implement pedestrian improvements in a TPA to increase walking opportunities, as well as the City of San Diego's Bicycle Master Plan to increase bicycling opportunities. The Specific Plan includes a circulation system that integrates pedestrian and bicycle connectivity, as anticipated in the Mission Valley Community Plan. Pedestrian and bicycle circulation would be supported by integrated facilities within/adjacent to the roadway, as well as facilities within the recreation and open space areas.

The Riverwalk project would include community-specific adaptation and resource conservation measures. The Riverwalk Specific Plan includes a greenbelt and street tree plan and would provide for the preservation of existing trees. Plant material selection would be selected to minimize the excessive use of water, pesticides, and fertilizers. In accord with the City's Conservation Element and the Mission Valley Community Plan, Riverwalk seeks to reduce its *environmental footprint* and contribution of greenhouse gas emissions through an appropriate land use plan that contains a variety of land uses in proximity with one another (for example, local serving retail would provide food and beverage options for residents and guests) and connects those land uses in an efficient manner, promoting alternative modes of transportation and a variety of mobility options. These efforts are also in accordance with the City's Climate Action Plan, supporting not only the advancement of the City of Villages concept, but also promoting active transportation options and improving accessibility.

Future development projects were assessed through the CAP Consistency Checklist (Appendix C2). Developments would implement Strategy 1: Energy and Water Efficiency Buildings by including cool/green roofs and efficient plumbing fixtures and fittings. Relative to Strategy 3: Bicycling, Walking, Transit, and Land Use, development would provide for electric vehicle charging, bicycle parking in excess of the Municipal Code requirement, shower facilities (commensurate with requirements of the CAP Consistency Checklist table), designated parking spaced for low-emitting, fuel-efficient, and carpool/vanpool vehicles, and the inclusion of a Transportation Demand Management Program for any development over 50 employees. Based on the project's consistency with the CAP Consistency Checklist strategies, the project's contribution of GHG emissions to cumulative Statewide emissions would be less than cumulatively considerable.

Overall, both the Specific Plan and future projects associated with buildout of the Specific Plan would be consistent with the CAP.

San Diego River Park Master Plan

The SDRPMP provides general and specific recommendations to protect and preserve the San Diego River and its channel. Table 5.1-2, *San Diego River Park Master Plan Analysis*, provides a consistency analysis for the project and the SDRPMP. The Riverwalk Specific Plan specifically incorporates the recommendation of the SDRPMP in Section 6.6.15, *River Corridor Area*, and Section 6.6.16, *River Influence Area*. As analyzed in Table 5.1-2, the project would be consistent with the intent of the SDRPMP, with modifications as required to allow for project development. Modifications relate to the location of the San Diego River Pathway where the Path Corridor crosses Riverwalk Drive,

composition of the San Diego River Pathway adjacent to and away from Riverwalk Drive, minor setback and massing revisions, and reflectivity factor of buildings. The SDRPMP is also implemented through the Mission Valley Community Plan San Diego River Subdistrict CPIOZ-Type A regulations to ensure that development along the San Diego River implements the SDRPMP. As discussed below under Mission Valley Community Plan and included in Table 5.1-3, *Mission Valley Community Plan Analysis*, the project would be consistent with the Area-Specific: San Diego River policies of the Mission Valley Community Plan and the San Diego River Subdistrict CPIOZ-Type A regulations.

The project would support and maintain a healthy river system through the restoration and enhancement of riparian habitat along the San Diego River. The project would provide pedestrian linkages and access to the San Diego River that include interpretive signage about the rich history of the Lower Valley. The project would also orient development toward the river, enhance and restores a portion of the MHPA area surrounding the river, and create approximately 97 acres of on-site park space.

Mission Valley Community Plan

The project is located within the Mission Valley Community Plan area. Table 5.1-3, *Mission Valley Community Plan Analysis*, includes a discussion relative to the project's consistency with the applicable policies, outlined above in Section 5.1.2.4. Additionally, responses in Table 5.1-3 indicate specific goals, regulations, and policies of the Riverwalk Specific Plan (which apply to ministerial and discretionary projects developed in accordance with the Specific Plan) that specifically address the applicable policies of the Mission Valley Community Plan. The analysis demonstrates that the project would be consistent with the area specific policies of the Mission Valley Community Plan and the San Diego River Subdistrict CPIOZ Type-A regulations that implement the SDRPMP. The project would allow for a variety of multi-family housing types in a mixed-use pedestrian- and transit-oriented development that would integrate residential uses with commercial employment uses. The project would also allow for integration of neighborhood commercial shopping throughout the project site. Walkable centers of activity would be provided around the trolley station in the North District, the repurposed clubhouse in the Central District, and the employment node in the South District. Retail parking, where required, would be located in close proximity to the retail establishments served. Activation would occur on the ground level of buildings, as well as within public spaces. The project would be developed in accordance with Title 24 energy conservation requirements and would also incorporate sustainable building and site design.

The project includes a Community Plan Amendment to align the Mission Valley Community Plan with the Riverwalk Specific Plan. This includes revisions to the Planned Land Use map (Figure 4 of the Mission Valley Community Plan) to adjust the overall site boundary and the boundaries of the existing land use designations to be consistent with the Riverwalk Specific Plan and to remove the "To be completed" reference on the Riverwalk Specific Plan area label. Furthermore, the project site will be removed from the CPIOZ map (Figure 39 of the Mission Valley Community Plan), consistent with the proposed LDC amendment, and slight text changes will be made indicating that the specific

plans identified in the Specific Plan Subdistrict were adopted prior to the adoption of the current Mission Valley Community Plan. The proposed revisions to the Mission Valley Community Plan would not result in significant land use impacts.

Levi-Cushman Specific Plan

Currently, the project site is regulated by the Levi-Cushman Specific Plan. One of the project's discretionary actions is to rescind the Levi-Cushman Specific Plan. With rescission, the Levi-Cushman Specific Plan is no longer applicable to the project site.

Significance of Impacts

The project is consistent with the policies and goals of applicable plans. Therefore, impacts would be less than significant.

Mitigation Measures

No mitigation measures would be required.

5.1.3.2 Issue 2

Issue 2 Would the project physically divide an established community?

Impact Threshold

Based on the City's CEQA Significance Determination Thresholds, a project could have a significant land use impact if:

- The project would physically divide an established community.

Analysis

Implementation of the Specific Plan would include pedestrian, bicycle, and vehicle circulation networks, as described and illustrated in Section 3.4, *Riverwalk Specific Plan and Components*. These networks allow for active and multimodal transportation through the Specific Plan area to the greater Mission Valley community, as well as connectivity to the various districts and components within the Specific Plan area. The project's circulation networks is critical to providing access and connections between uses and services, on- and off-site. The project would provide a connection to the regional transit network through the provision of a new transit/trolley stop. The project's vehicular circulation network has been designed to connect with the surrounding streets, allowing for connection to the greater Mission Valley and City circulation network. As such, the project would provide additional access to the community. No impacts relative to physically dividing a community would occur.

Significance of Impacts

The project would not physically divide an established community. Therefore, no impacts would occur.

Mitigation Measures

No mitigation measures would be required.

5.1.3.3 Issue 3

Issue 3 Would the project result in land uses which are not compatible with an adopted Airport Land Use Compatibility Plan (ALUCP)?

Impact Threshold

Based on the City's CEQA Significance Determination Thresholds, a project could have a significant land use compatibility impact if the project results in:

- *Incompatible uses as defined in the airport land use plan or an inconsistency with an airport's land use compatibility plan as adopted by the Airport Land Use Commission to the extent that the inconsistency is based on valid data.*
- *If the project is proposed within the Airport Environs Overlay Zone (AEOZ) as defined in Chapter 13, Article 2, Division 3 of the San Diego Municipal Code, the potential exterior noise impacts from aircraft noise would not constitute a significant environmental impact.*

The City's Significance Determination Thresholds also provide guidance for Airport Noise Impacts, including Table K-3. The noise zone a project falls within and the applicable noise threshold depends on the project's location within the Airport Influence Area.

According to Chapter 3.10 of the City's General Plan Program EIR, the City implements adopted ALUCPs with the Airport Environs Overlay Zone (AEOZ). Chapter 13, Article 2, Division 3 of the SDMC defines an AEOZ as an area within a noise contour zone of the San Diego International Airport. In addition, interior noise impacts would be regulated by the requirement for residential development within the AEOZ to reduce interior noise levels attributable to airport noise to 45 CNEL. In addition, the City General Plan states that *for any future residential use above the 65 dBA CNEL must include noise attenuation measures to ensure an interior noise level of 45 dBA CNEL, provision of an avigation easement, and be located in an area where a community plan and the Airport Land Use Compatibility Plan allow residential uses.* Specifically for noise, avigation easements provide the airport operator the right to subject the property to noise associated with normal airport activity.

Analysis

The northeast portion of the project site is located within AIA Review Area 2 of the Montgomery Field ALUCP (see Figure 2-10) and is within the FAA Height Notification Boundary, as identified on Compatibility Policy Map: FAA Height Notification Boundary (see Figure 5.16-7, *Montgomery Field Airport Compatibility Policy Map: Part 77 Airspace Protection*). Location within the FAA Height Notification Boundary requires that the FAA be notified of any proposed construction or alteration having a height greater than an imaginary surface extending 100 feet outward and one foot upward (slope of 100 to one) from the runway elevation. The ALUC issued Consistency Determination Letters for the project, and the FAA has made a Determination of No Hazard to Air Navigation letters (see Appendix Y). These letters confirm that the project would not be a hazard to air navigation. As such, the project would not result in obstruction to airport operations from Montgomery-Gibbs Executive Airport. Therefore, the project would not result in any significant land use impacts relative to land use compatibility with the Montgomery Field ALUCP.

The project site is not within the safety zones identified on the Compatibility Policy Map: Safety for Montgomery Field ALUCP or within the airport overflight notification area identified on the Compatibility Policy Map: Overflight and Avigation Easement and Overflight Notification Areas map. The project site is also not within the Compatibility Policy Map: Noise area, nor is it within the Part 77 Airspace Surfaces contour of the Part 77 Airspace Protection airport compatibility policy map.

Relative to the San Diego International Airport ALUCP, the entire project site is located within Review Area 2 of the AIA (see Figure 2-11), as well as the Airspace Protection Boundary (see Figure 5.16-6). As shown on Figure 5.16-6, the Specific Plan area is outside of the FAA Part 77 certification of non-obstruction area; as such, no FAA Determination of No Hazard to Air Navigation is required. Additionally, the southern portion of the site is within the Overflight Area Boundary on the Overflight Area Boundary Map (see Figure 5.16-5, *San Diego International Airport Compatibility Policy Map: Overflight*). This location requires development within the Overflight Area Boundary to issue an Overflight Notification, as applicable. An Overflight Notification is a buyer awareness tool that ensures prospective buyers of residential land use development near an airport are informed about the airport's potential impact on the property. Any future for-sale residential development in accordance with the Riverwalk Specific Plan would require overflight notification to buyers located within the Overflight Area Boundary. This notification requirement does not result in a land use impact. Therefore, the project would not result in any significant land use impacts relative to land use compatibility with the San Diego International Airport ALUCP.

The project site is not within the noise contours identified on the Noise Contour Map. The project site is not within the safety zones identified on the Safety Compatibility Zones Map.

The project has been issued a *San Diego County Regional Airport Authority, Airport Land Use Commission Determination* (September 6, 2019; see Appendix Z) confirming the consistency of the project with the Montgomery Field and SDIA ALUCPs. The project has also been issued *Determination of No Hazards to Air Navigation* from the FAA, based on conceptual building heights and locations,

demonstrating no risk relative to obstruction of aircraft (see Appendix Y). Separate FAA notifications would be required at the time of building permits for future structures.

Significance of Impacts

The project would not result in a land use that would be incompatible with either the San Diego International Airport or Montgomery Field ALUCPs. Therefore, impacts would be less than significant.

Mitigation Measures

No mitigation would be required.

5.1.3.4 Issue 4

Issue 4 Would the project require a deviation or variance, and the deviation or variance would in turn result in a physical impact on the environment?

Impact Thresholds

Based on the City's CEQA Significance Determination Thresholds, a project could have a significant land use impact if it would result in:

- *Inconsistency/conflict with an adopted land use designation or intensity and indirect or secondary environmental impacts occur.*

Analysis

The amendments to the Land Development Code and the Mission Valley Community Plan would remove the site from the CPIOZ. Since the Levi-Cushman Specific Plan will no longer be valid, the CPIOZ Specific Plan Subdistrict that provided consistency between the Levi-Cushman Specific Plan and the Mission Valley Community Plan is no longer necessary. In addition, the requirements of the San Diego River Subdistrict are also no longer necessary because they have been integrated into the Riverwalk Specific Plan within Section 6.5.16, River Corridor Area, and Section 6.5.17, River Influence Area, with some deviations, as described under Issue 1. Because neither subdistrict serves a regulatory need with the adoption of the Riverwalk Specific Plan, the CPIOZ would be totally eliminated from the site.

As noted above, the project site is zoned CC-3-9, RM-4-10, OP-1-1, and OC-1-1. The project would rezone portions of the Specific Plan area to align the existing zoning boundaries with what is proposed for the project. No new base zones would be introduced; however, Tailored Development Standards would be implemented with the project to augment standard base zoning. Figure 3-12, *Proposed Zoning*, identifies the zones for the Specific Plan. As proposed, development areas within Riverwalk would be zoned CC-3-9 and RM-4-10. Park and open space elements along and around the

San Diego River would be zoned OC-1-1 (for the river channel within the MHPA and 50-foot no use buffer) and OP-1-1 (for the park elements). (See Section 5.1.2.5 for a definition of the zones.)

Although the zones would provide the underlying regulations governing use and form within the Specific Plan area, the project ultimately would be governed by the Specific Plan, which is a regulatory document that specifies the maximum amount of development, allowable land uses, and design specifics. The Specific Plan sets design standards, land use policy, building standards, landscaping standards, and architectural character and design standards. The Specific Plan provides guidance for mobility and circulation, as well as infrastructure improvements for water, wastewater, and drainage systems. In some cases, the Specific Plan references the LDC directly; where the Specific Plan is silent, applicable provisions and requirements of the LDC remain in force. Where a conflict exists, the Riverwalk Specific Plan standards would apply.

The goals and recommendations of the SDRPMP relative to the River Corridor Area and River Influence Area are incorporated into the Mission Valley Community Plan as the San Diego River Subdistrict CPIOZ. The San Diego River Subdistrict CPIOZ would be removed from the project site through the proposed LDC Amendment, as the Riverwalk Specific Plan incorporates the goals and recommendations of the SDRPMP in Section 6.5.16, *River Corridor Area*, and Section 6.5.17, *River Influence Area*. Incorporation of the SDRPMP into the Riverwalk Specific Plan ensures implementation of and consistency with the SDRPMP.

The Specific Plan would allow for some deviation in development standards and regulations from the City's LDC – known as Tailored Development Standards in the Riverwalk Specific Plan – in order to achieve the goals and objectives of the Riverwalk Specific Plan (see Table 5.1-6, *Riverwalk Tailored Development Standards*). Specifically, the project proposes project-specific Tailored Development Standards relative to street frontage, front setback, determining yards, maximum floor area ratio, maximum permitted residential density, minimum floor area ratio for residential use, private exterior open space, lot coverage, storage requirements, general storage requirements for refuse and recyclable material storage, minimum exterior refuse and recyclable material storage areas for residential and non-residential uses, required off-street loading spaces, and retaining walls. These Tailored Development Standards are presented in Table 3-6, *Riverwalk Tailored Development Standards*, and are discussed below. The Tailored Development Standards apply to the entire Specific Plan areas, specific zones, or specific lots/locations; the discussion below includes reference as to where and in what instances the Tailored Development Standard would apply.

Street Frontage

This Tailored Development Standard applies to Lots 38, 41, NN, PP, RR, YY, and ZZ (located in the CC-3-9 zone) and Lots 30, 31, AA, BB, DD, EE, and LL (located in the RM-4-10 zone). Relative to street frontage, LDC Table 131-05E requires a minimum street frontage of 25 feet within the CC-3-9 zone and LDC Table 131-04G requires a minimum street frontage of 25 feet within the RM-4-10 zone. The Specific Plan would allow for certain lots with no public street frontage. The Tailored Development Standard would allow for these lots to be provided for public use and/or to be accessed via private

drives and other public-use parcels. This access would allow for lots without street frontage to be accessible. Lots provided for public access without street frontage would not result in a significant land use impact. Additionally, no secondary physical impacts would result due to the conferred access, as conferred access would not result in a significant change in the physical environment. No impact would result from this Tailored Development Standard.

Front Setback

This Tailored Development Standard applies to Lots 7 through 12 (located in the CC-3-9 zone). Relative to front setback, LDC Table 131-05E limits front setback in the CC-3-9 zone to a maximum of 10 feet. Due to the project's location within the existing fabric of the Mission Valley community, the Riverwalk site abuts existing circulation element roadways, in particular Friars Road to the north. As a result, there are lots in the Specific Plan area that front on Friars Road and the internal spine road (Streets 'D1', 'D2', and 'E'). A significant grade differential between the two streets restricts the ability of future buildings to adhere to the maximum 10-foot setback on Friars Road; therefore, the project includes a Tailored Development Standard to allow the maximum setback for Friars Road be set at 40 feet. This would also provide opportunities for pocket and mini parks, while ensuring that development along Friars Road blends with the surrounding community. This greater setback along Friars Road would not result in a significant change to the physical environment, and no primary or secondary impacts would result.

Determining Yards

This Tailored Development Standard applies to Lots 5 through 7, 11 through 14, as well as Lots 16, 30, 31, and 41; this Tailored Development Standard is not zone-specific. The Specific Plan includes internal streets parallel to the existing roadways that reduce automobile trips on the abutting roadways. Additionally, the City's Street Design Manual limits driveways on four-lane Major roadways. These internal streets would provide alternative vehicle access to the individual lots and would create a more intimate scale of development for the pedestrian/bicyclist and motorist alike. Thus, within areas that abut the existing circulation element roadways, lots are created that have two front yards – the internal street and the external roadway. These lots include Lots 5 through 7 and Lots 11 through 14 abutting Friars Road and internal Streets 'D1', 'D2', and 'E'. Keeping with the principle theme of the design guidelines to encourages buildings to engage with the street and create public spaces that foster pedestrian activity within a neighborhood center-feel, a Tailored Development Standard would allow for the front yards abutting the external street to be considered "rear yards." The front yards for Lots 16, 30, 31, and 41 would be abutting the private driveway for purposes of determining setback and activating the pedestrian realm. By fronting guiding activation to the internal circulation network of Riverwalk, the pedestrian-focus would be center on smaller-scale and slower travel internal streets, rather than wide and high speed Friars Road. This Tailored Development Standard would not result in a significant land use impact, as its intention is to create a more activated street scene within Riverwalk and would not lead to any environmental effects.

Maximum Floor Area Ratio

This Tailored Development Standard applies to any development within the CC-3-9 zone. The CC-3-9 zone, per LDC §131.0546(a) allows for a floor area ratio of 2.0, with a floor area ratio bonus of up to 3.0 for residential mixed-use plus up to 1.0 FAR for mixed-use underground parking, for a total of 6.0 FAR. The Specific Plan is intended to be a fully integrated mixed-use neighborhood with vertical and horizontal mixes of uses, this Tailored Development Standard allows development within the Specific Plan area to take advantage of the floor area ratio bonus, regardless of building use, to create the development intensity and transit-supportive densities required for an activated in-fill development. The floor area ratio bonus would not result in a significant impact, as development envelopes would remain regulated by other requirements of the LDC and the Specific Plan, such as height limitations (a maximum of seven stories in the North and Central Districts and a maximum of 200 feet in the South District) and setbacks. Additionally, regulations and policies of Chapter 6, *Land Use, Development Standards, and Design Guidelines*, of the Specific Plan further ensure that bulk and scale is appropriately addressed (see Section 5.3, *Visual Effects and Neighborhood Character*, for further discussion of bulk and scale). Development within Riverwalk would still be required to abide by the standards and regulations of the underlying zone, except where noted in these Tailored Development Standards, as well as regulations and policies of the Specific Plan (which apply to ministerial and discretionary projects developed in accordance with the Specific Plan and are addressed in Chapter 6 of the Specific Plan and Section 5.3 of this EIR) that further address bulk and scale and would minimize the primary and/or secondary physical impacts related to a floor area ratio bonus. No impact would result.

Maximum Permitted Residential Density

This Tailored Development Standard applies to any development within the CC-3-9 zone. Residential density, per LDC Table 131-05E, is limited to a minimum of 400 square feet per unit in the CC-3-9 zone. The Specific Plan would incorporate 200 square feet per unit minimum in the CC-3-9 zone to allow for greater density in the mixed-use concentrations of the neighborhood, walkable to retail, employment, recreation, and transit. Additionally, this Tailored Development Standard would allow for the project to contribute in the greatest manner toward the City's housing needs by maximizing the number of units provided on-site within the given zoning. Development within the Specific Plan would still be required to abide by the standards and regulations of the underlying zone, except where noted in these Tailored Development Standards, as well as regulations and policies of the Specific Plan (which apply to ministerial and discretionary projects developed in accordance with the Specific Plan) that further address bulk and scale and would minimize the primary and/or secondary physical impacts related to a reduced minimum residential unit size. No impact would result.

Minimum Floor Area Ratio for Residential Use

This Tailored Development Standard applies to any development within the CC-3-9 zone. Relative to minimum residential floor area ratio in the CC-3-9 zone, LDC Table 131-05E requires a minimum residential floor area ratio of 2.0. A Tailored Development Standard would allow for the minimum residential floor area ratio in the CC-3-9 zone to be 1.0, which would reduce the minimum required amount of residential use within mixed-use developments in areas zoned CC-3-9. The overall project

would develop as a fully integrated neighborhood with a vertical and horizontal mixture of uses. The residential development would be mutually-supportive of retail, employment, recreation and transit uses. The requirement of LDC Table 131-05E is intended to ensure a certain amount of residential is developed within mixed-use project; however, because the overall project would be developed as a mixed-use neighborhood with 4,300 residential units, this regulation can be relaxed by the Tailored Development Standard without losing the residential intensity envisioned by this regulation. Development within the development area would still be required to abide by the standards and regulations of the underlying zone, except where noted in these Tailored Development Standards, as well as regulations and policies of the Specific Plan (which apply to ministerial and discretionary projects developed in accordance with the Specific Plan) that further address bulk and scale and would minimize the primary and/or secondary physical impacts related to a floor area ratio bonus. No impact would result.

Ground Floor Restrictions

This Tailored Development Standard applies to Lots 9, 10, 22 through 24, and 43 through 52 (within the CC-3-9 zone). Relative to ground floor restrictions in the CC-3-9 zone, LDC §131.0540© prohibits residential use within the front 30 feet of the ground floor of any building. Riverwalk would be a mixed-use community with a variety of uses (residential, retail, employment, and park/open space) integrated vertically and horizontally that provide reciprocal benefit in the creation of a viable in-fill neighborhood. Some residential development may occur without a ground floor commercial use, as the requirement for such quantity of retail across the entire Riverwalk site may not be appropriate or economically viable. Inclusion of excess retail space risks vacant store fronts that result in unpleasant void space within the pedestrian realm. Additionally, solely residential buildings may be provided in a campus-like environment with commercial or employment uses, allowing for greater integration and to promote walkability. This Tailored Development Standard removes the prohibition of residential uses within the first 30 feet on the ground floor, allowing residential use (which may already occur on the ground floor outside the first 30 feet) to occur on the entire ground floor. The 30-foot commercial requirement on the ground floor would remain for Lots 9, 10, and 22 through 24. For lots within the South District (Lots 43 through 52), residential use on the ground floor would be limited to residential lobbies and leasing offices. This Tailored Development Standard results in a swapping out of uses allowed within the first 30 feet of the ground floor and would not result in any environmental effects. Development within the project would still be required to abide by the standards and regulations of the underlying zone, except where noted in these Tailored Development Standards, as well as regulations and policies of the Specific Plan (which apply to ministerial and discretionary projects developed in accordance with the Specific Plan) that further address bulk and scale and would minimize the primary and/or secondary physical impacts related to residential use on the ground floor. No impact would result.

Private Exterior Open Space

This Tailored Development Standard applies to any development within the RM-4-10 zone, as well as residential components of projects developed in the CC-3-9 zone. Relative to private exterior open space LDC §131.0455(d) requires within residential development, at least 50 square feet of usable,

private exterior open space abutting each dwelling unit shall be provided with a minimum dimension of four feet. Within residential developments in the project, at least 40 square feet of usable, private, exterior open space abutting each dwelling unit would be provided with a minimum dimension of four feet. Where private exterior open space is not provided at the quantity required, a Tailored Development Standard allows for an equal amount of common exterior open space to be added to the common exterior open space requirements of LDC §131.0456. This Tailored Development Standard would result in less required private residential open space (a reduction of 10 square feet per unit) and a proportionate increase in common open space and would not result in any environmental effects. No impact would result.

Lot Coverage

This Tailored Development Standard applies to any development within the RM-4-10 zone. Relative to lot coverage in the RM-4-10 zone, LDC §131.0445(d) requires a maximum lot coverage of 50 percent (60 percent for corner lots). The project defines a minimum lot coverage of 35 percent and a maximum lot coverage of 75 percent. This Tailored Development Standard allows for greater residential density within the proposed urban neighborhood, while ensuring open space is still available for project amenity area. This Tailored Development Standard results in 15 to 20 percent more allowable lot coverage for residentially-zoned lots to allow for a more integrated mixed-use project, as more residential development would be allowed to support commercial and employment uses on-site. Bulk and scale of development would remain controlled by the standards and regulations of the underlying zone, except where noted in these Tailored Development Standards, as well as regulations and policies of the Specific Plan (which apply to ministerial and discretionary projects developed in accordance with the Specific Plan). As such, increased lot coverage would not result in any environmental effects. No impact would result.

Storage Requirements

This Tailored Development Standard applies to any development within the RM-4-10 zone, as well as residential components of projects developed in the CC-3-9 zone. Relative to storage requirements in the RM-4-10 zone, LDC §131.0454 requires that each dwelling unit have a fully enclosed, personal storage area outside the unit that is at least 240 cubic feet with a minimum seven-foot horizontal dimension along one plane. Residential developments within the project would provide personal storage at a minimum rate of 0.5 storage units per residential unit, at a minimum size of 120 cubic feet. This Tailored Development Standard allows for residential projects to respond to consumer demands relative to storage and provide space otherwise required for residential storage to be allocated toward amenities or residential dwelling units. Providing less storage space within the building envelope would not result in primary or secondary physical environmental effects. No impact would result.

General Regulations for Refuse and Recyclable Material Storage Areas

This Tailored Development Standard applies to any development within Riverwalk; this Tailored Development Standard is not zone-specific. Relative to the general regulations for refuse and recyclable material storage (LDC §142.0810(b)(6)), commercial development on premises not served

by an alley are required to locate material storage areas at least 25 feet from any street or sidewalk. Setback requirements of the zones selected for development areas have minimal setbacks. Such a required setback for the location of materials storage areas may result in storage areas being located right next to residential or mixed-use components of the project, which may create a nuisance to those residents and users. The project includes a Tailored Development Standard to remove this requirement and allow material storage to occur closer than 25 feet to a street or sidewalk, as the LDC's expansive setback requirement may be in conflict with implementing an integrated, mixed-use project that seeks to minimize nuisance exposures to residents. No impact would result.

Minimum Exterior Refuse and Recyclable Material Storage Areas

This Tailored Development Standard applies to any development within Riverwalk; this Tailored Development Standard is not zone-specific. Relative to minimum exterior refuse and recyclable material storage areas, LDC Table 142-08B and LDC Table 142-08C include minimum requirements for residential and non-residential projects, respectively, based on the number of units (for residential development) or square footage (for non-residential development). The project would provide a minimum of 50 percent refuse and recyclable storage areas included in LDC Table 142-08B and/or Table 142-08C. The Specific Plan would allow developments as they are constructed to provide less storage area square footage where it can be demonstrated that the reduced storage area meets the intention of the requirements of the applicable LDC table(s). This Tailored Development Standard allows reduced refuse and recyclable material storage space and alternative compliance with the storage area requirements. Alternative compliance, which allows for greater efficiency of storage space, may include compactors, more frequent hauling service, future innovations in refuse and recyclable storage, or a combination of these items. Primary or secondary physical impacts would not occur due to less space being allocated for exterior refuse and recyclable material storage areas, as City staff would determine that reduced storage demonstration or alternative compliance measures are acceptable to ensure no accumulation of refuse or recyclable materials. No impact would result.

Off-street Loading Spaces

This Tailored Development Standard applies to any development within Riverwalk; this Tailored Development Standard is not zone-specific. Relative to off-street loading spaces, SDMC Table 142-10B does not allow for on-street loading. However, off-street loading areas are required for all multi-unit residential and commercial developments that meet certain unit count and square footage requirements outlined in SDMC Table 142-10B. The project proposes a Tailored Development Standard to allow for one on-street loading space per building in lieu of or in addition to off-street loading. Each on-street loading space would have a minimum length of 40 feet and a minimum width of 12 feet. With adequate signage, the on-street loading area may be converted to other uses (parking, passenger drop-off, etc.) during non-business/peak loading hours. Providing on-street loading area would not result in a primary or secondary physical impact, as the roadway network as designed with the Specific Plan would allow for such a use. No impact would result.

Retaining Walls

Development of Riverwalk would include three Tailored Development Standards relative to retaining walls. These Tailored Development Standards apply to any development within Riverwalk and are not zone-specific. Relative to retaining wall regulations in all zones, LDC §142.0340©(1), two retaining walls with a maximum height of three feet are permitted in the required front and street side yards if the two retaining walls are separated by a minimum horizontal distance equal to the height of the upper wall. The retaining walls on the southern boundary of Lot QQ adjacent to the transit stop and the southeastern corner of Lot SS are in excess of three feet and necessary to support the MTS Trolley Tracks. Two three-foot retaining walls would not provide the needed separation for Street 'J' to cross under the MTS Trolley Tracks; therefore, a single retaining wall that ranges in height 23 feet to less than three feet would allowed, provide it includes landscaping such as vines and trees to assist with masking the wall.

Relative to LDC §142.0340©(3), retaining walls of three feet in height or greater are required to have at least one horizontal or vertical offset for each 120 square feet of wall area, except where otherwise provided in LDC §142.0340(f). The horizontal or vertical offset shall be at least 12 inches wide with a minimum reveal of four inches. Vertical or horizontal offsets for every 120 square feet of wall area would not practical for a retaining wall necessary to support the MTS Trolley Tracks that reaches a height of 23 feet. Offsets would be provided through the use of vines, trees, or other landscaping elements.

Relative to retaining wall height outside of required yards regulations in all zones, §LDC 142.0340(e) requires that retaining walls located outside of the required yards not exceed 12 feet in height. The retaining wall located near the rear of Lot 28 would not visible from a public right-of-way and would largely be lower than the elevation of the MTS Trolley Tracks that are adjacent to the rear of Lot 28. Since the retaining wall would be provided to allow access to a Public Utility facility that crosses under the MTS Trolley Tracks, it cannot be screened with trees or shrubs; however, it would be screened with vines plant above and below the wall.

Walls in excess of retaining wall regulations of the LDC, to which these Tailored Development Standards apply, would not be highly visible, as they would be required to support the MTS Trolley Tracks and would visually appear as supportive walls of the vehicular undercrossing. Views from public vantage points would be minimal. Landscaping requirements of the LDC and these Tailored Development Standards would further minimize the visual effect of these walls. Therefore, no land use impact would occur.

Deviations from the ESL Regulations would be required due to unavoidable impacts to wetlands associated with improvements to Fashion Valley Road, as discussed in Section 5.4, *Biological Resources*. The project would qualify for a deviation under the EPP Option. The wetland deviation is associated with the project's impact to sensitive biological resources related to the direct removal of wetlands on the project site. A Mitigation Framework for impacts to wetlands is provided in Section

5.4, *Biological Resources*. The allowed deviations would be consistent with the requirements of the LDC.

Significance of Impacts

The Specific Plan would modify some of the proposed base zones' development regulations, as shown in Table 5.1-6 to create Tailored Development Standards. These would permit the development of the site as an integrated neighborhood and transit-oriented development. Further, the Tailored Development Standards would not result in a physical impact on the environment. Impacts would be less than significant.

A deviation from the City's ESL Regulations would be required, due to the project's wetland impacts. However, as discussed above and in Section 5.4, the project would be consistent with the requirements of the LDC. Although project implementation would result in impacts to sensitive wetlands, mitigation measures would be required, as identified in Section 5.4, *Biological Resources*, to reduce impacts to a below a level of significance. With implementation of the mitigation measures provided, the project would not result in a conflict with the purpose and intent of the regulations in the LDC. Impact would be less than significant.

Mitigation Measures

No mitigation would be required.

5.1.3.5 Issue 5

Issue 5 Would the project conflict with the City's Multiple Species Conservation Program (MSCP) Subarea Plan or other approved local, regional, or State habitat conservation plan?

Impact Threshold

Based on the City's CEQA Significance Determination Thresholds, a project could have a significant land use impact if it would:

- Result in an inconsistency/conflict with adopted environmental plans of an area.

Analysis

MHPA Guidelines

According to the City's MSCP Subarea Plan, the project site is an urban habitat area that includes the San Diego River in the MHPA. The Subarea Plan lists MHPA Guidelines for the San Diego River that are required to be implemented for take authorization of Covered Species. Guideline B15 is required

to be met by the project and states:

Native vegetation shall be restored as a condition of future development proposals along this portion of the San Diego River Corridor.

The project would comply with Guideline B15 through removal of invasive, non-native plant species and through focused seeding and container stock planting of native species along the San Diego River on-site in the MHPA as presented in the Wetland Restoration Plan prepared for the project (February 19, 2019; Alden Environmental, Inc.). Therefore, the project would not conflict with the provisions of an adopted Habitat Conservation Plan, NCCP, or other approved local, regional or state habitat conservation plan.

MHPA Land Use Adjacency Guidelines

The project proposes development of Riverwalk River Park on approximately 88.25 acres. The Riverwalk River Park would be located north and south of the San Diego River and, therefore, would be adjacent to the MHPA. Uses within the Riverwalk River Park would include sports fields, picnic areas, dog parks, water features, a ranger station, a recreation center, restroom facilities, parking, and/or other amenities. The active park uses (ball fields, picnic areas, etc.) are located on the far north and south ends of the park, away from the river channel and the MHPA. Uses nearer to the channel and partially within the MHPA would be passive in nature and would include walking/hiking trails and nature observation nodes with educational kiosks.

The project would provide a biological buffer through the establishment of a 50-foot-wide no use buffer and a passive park area as shown in Figure 5.4-3, *Development Plan/Impacts*. Boulders or deterrent vegetation, as well as peeler log fencing, would be installed at the edge of this no use buffer to deter public access. The no use buffer and passive park areas north and south of the river channel would be graded to provide flood capacity along the river and restored to native plant species appropriate within and adjacent to native wetland/riparian habitats. No uses would be allowed in the no use buffer (except proposed MSCP compliant trails attached to the two existing bridges on-site), and the passive park would only allow passive uses (i.e., walking/hiking trails and nature observation nodes). This would result in an overall buffering of the MHPA, river, and wetland habitat restoration from active park uses by a minimum of 55 feet (in the southwestern and northeastern portions of the project site) to a maximum of 590 feet (in the western portion of the project site), with an average distance of 175 feet.

Provided design of the active park areas are consistent with City of San Diego Council Policy 600-33 and adheres to distance guidelines shown in Table 5.8-9, *Active Park Noise Levels at MHPA Boundary*, noise associated with use of the active recreation areas, with the exception of the amphitheater, would not exceed 60 dBA at the MHPA boundary. Noise levels associated with performances at the amphitheater, which would be oriented to emit sound to the north, away from the MHPA, would be approximately 66 dBA at the MHPA boundary, assuming a reference level of 93 dBA at the shell front. Impacts to sensitive wildlife species within the San Diego River corridor could be significant

and adverse without mitigation. Implementation of mitigation measure 5.8-6 would reduce impacts associated with use of the amphitheater to less than significant.

Development adjacent to the MHPA must ensure that indirect impacts into the MHPA are minimized. Indirect effects listed in the City's Subarea Plan include those from drainage, toxics, lighting, noise, barriers, invasives, brush management, and grading/land development as addressed by the LUAGs specifically for indirect impacts to the MHPA. The project site includes areas within and adjacent to the MHPA; therefore, conformance with the MHPA LUAGs would be required, as described below. Conformance with the MHPA LUAGs would become conditions of project approval.

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.*

Changes in hydrology, runoff, and sedimentation could indirectly impact species dependent on surface water. Increased runoff into habitat could also result in increased erosion and rates of scouring, which can result in downstream habitat loss for some species. Runoff, sedimentation, and erosion can adversely impact plant populations by damaging individuals or by altering site conditions sufficiently to favor other species (native and exotic non-native) that could outcompete sensitive species.

Grading activities associated with construction have potential to result in erosion and sedimentation within the San Diego River channel. Sedimentation and erosion could change the structure of the existing river channel and degrade the quality of adjacent riparian vegetation. In addition, storm water contaminant runoff during construction could potentially carry a variety of pollutants into the river.

Stormwater management measures have been integrated into the project's design to ensure that increased runoff is not generated. Therefore, channel erosion impacts are not expected within the river channel. Also, runoff associated with parking lots and developed areas of the project would not drain directly into the MHPA. Storm water pollution control BMPs are part of the development plan. The project would comply with the requirements of this MHPA LUAG, which would reduce potential impacts to sensitive species, sensitive natural communities, and wetlands from drainage to less-than-significant levels.

The project proposes improvements to Fashion Valley Road to allow for a low water crossing of the San Diego River. The existing pipe culverts under Fashion Valley Road at its crossing of the San Diego River would be replaced with an arch culvert that would improve river flow

and street operations.

Final SWPPP would be prepared for the project to address erosion and sediment during the preparation of grading and construction plans for each phase, as well as long-term maintenance actions proposed for the drainage treatment systems, including those listed in Table 7-2 of the City of San Diego's Storm Water Standards Part 1: BMP Design Manual. Implementation of the SWPPP and long-term BMP maintenance would address pollutants and their sources (such as from the dog parks) associated with project construction thereby reducing potential impacts to sensitive species, sensitive natural communities, and wetlands from storm water pollution to less-than-significant levels.

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.*

As previously noted, the project would incorporate storm water pollution control BMPs to capture and filter runoff prior to entering the MHPA. Maintenance actions proposed for the drainage treatment systems include those listed in Table 7-2 of the City of San Diego's Storm Water Standards Part 1: BMP Design Manual. Overall, the project improves filtration of toxins compared to existing conditions and would reduce potential impacts to sensitive species, sensitive natural communities, and wetlands from toxics to less-than-significant levels.

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.*

Night lighting exposes wildlife to an unnatural light regime that may adversely affect foraging patterns, increase predation risk, cause biological clock disruptions, and result in a loss of species diversity. The Riverwalk River Park would be a dawn-to-dusk facility, much of which is within the floodway, and lighting would not be provided in the floodway. Any other project lighting installed, however, would be shielded, as necessary, to prevent light from spilling into the MHPA. Shielding would consist of the installation of fixtures that physically direct light away from the outer edges of the MHPA or landscaping, berms, or other barriers that prevent such light overspill. Final project plans would depict the shielded light fixtures or other mechanisms used to protect the MHPA from night lighting,

and the lighting used would adhere to the City's Outdoor Lighting Regulations (SDMC §142.0740).

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 curtailed during the breeding season of sensitive species. Adequate noise reduction measures should also be incorporated for the remainder of the year.*

The MHPA LUAGs require that uses in or adjacent to the MHPA be designed to minimize noise impacts. Noise impacts associated with the project are addressed in Section 5.8, *Noise*. The mixed-use development project (multi-family residential, community retail, office and non-retail commercial), once built, would not be adjacent to the MHPA and not expected to generate post-construction noise levels exceeding 60 dBA hourly average (that would be considered excessive). Additionally, there would be no active park uses that generate post-construction noise levels exceeding 60 dBA hourly average adjacent to the MHPA, nor wetland restoration activities in the MHPA that would do so.

There would be a 50-foot no use buffer adjacent to the MHPA and preserved/restored wetland habitats, and uses nearer to that no use buffer and the MHPA would be passive in nature and would include walking/hiking trails and nature observation nodes with educational kiosks that would not create excessive noise.

The Riverwalk River Park would be designed in accordance with Council Policy 600-33 General Development Plan, and would include both active and passive park spaces. According to the *Riverwalk San Diego Project Noise Study* (Birdseye Planning Group, 2020), a number of the potential active park uses were evaluated to determine whether those facilities could generate noise levels that would exceed 60 dBA hourly average. Reference noise levels for various active outdoor recreational uses were obtained for the purpose of evaluating potential impacts. The reference noise levels are summarized as follows:

- Soccer/outdoor field games – 52 dBA at 210 feet from the center of the field;
- Basketball/Sport courts – 64 dBA equivalent continuous sound level (Leq) at 40 feet from the center of court;
- Softball fields – 75 dBA at 25 feet from home plate;
- Fenced dog park – 52 dBA at 30 feet from park boundary;
- Playground – 64 dBA at 25 feet from the main concentration of activity;
- Amphitheater – 94 dBA at 20 feet from front of amplified speakers; and
- Walking trail/Picnic area – 60 dBA at five feet.

Table 5.1-5, *Active Park Noise Levels at MHPA Boundary*, shows the approximate distance to

the 60 dBA contour from each of the proposed active park project features, as well as the approximate distance of each feature from the MHPA for the current park design. Final park design would be subject to GDP approval and would adhere to the noise constraints outlined in Table 5.1-5.

Table 5.1-5 Active Park Noise Levels

Source	Reference Level	Approximate Distance to 60 dBA Contour
Soccer Field	52 dBA	0
Basketball/Sport Court	64 dBA	80 feet
Softball Field	75 dBA	140 feet
Dog Park	52 dBA	0
Playground	64 dBA	50 feet
Amphitheatre	87 dBA at 94 feet from speaker	200 feet
Walking Trails/Picnic Areas	60 dBA	0

Of the above potential uses, the amphitheater has the highest potential to produce excessive noise that could have an adverse effect on wildlife within the MHPA. Because the facility location and design are unknown, this is regarded as a potentially significant secondary land use impact to biological resources associated with noise.

Noise associated with use of the active park facilities would not exceed 60 dBA at the MHPA boundary. There would be a minimum of approximately 200 feet and a maximum of approximately 600 feet between the 60 dBA contour (for any proposed use) and the MHPA, and that noise buffer area would include passive park, the 50-foot no use buffer, and habitat restoration areas.

Construction-related noise from such sources as clearing, grading, and construction vehicular traffic from the project, however, could result in a significant temporary impact to wildlife, if species sensitive to noise are present in the MHPA at the time of construction. This significant indirect impact would occur if the least Bell's vireo, southwestern willow flycatcher, and/or light-footed Ridgway's rail are present; if construction occurs during the period March 15 through September 15 (May 1 and September 1 for the flycatcher); and if construction noise levels exceed 60 decibels dBA hourly average (or to the ambient noise level if it already exceeds 60 dB (A) hourly average) at the edge of occupied habitat. Indirect noise-related impacts to sensitive wildlife species would be considered significant as addressed in Section 5.4, *Biological Resources*.

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.*

The project would utilize and maintain existing bridges in the MHPA and would create MSCP compliant trails and passive uses on-site within the MHPA. Per the City's Subarea Plan, passive recreation and trails are compatible with the biological objectives of the MSCP and, therefore, are allowed in the MHPA. Active park uses would not occur adjacent to the MHPA, including the dog parks that would be fenced. Boulders or deterrent vegetation, as well peeler log fencing, would be installed to deter entrance into the 50-foot no use buffer around the MHPA and wetland restoration areas. Therefore, significant impacts to the MHPA from public access/use are not anticipated.

Invasives. *No invasive non-native plant species shall be introduced into areas adjacent to the MHPA.*

Invasive, non-native plants can colonize areas disturbed by construction and potentially spread into the MHPA. Such invasions can displace native plant species, reduce diversity, increase flammability and fire frequency, change ground and surface water levels, and adversely affect the native wildlife that are dependent on native vegetation. The majority of the area proposed to be graded as part of the project and particularly adjacent to the MHPA, however, is urban/developed land currently developed as a golf course. It is not land dominated by invasive, non-native species, which could potentially spread into the MHPA. Additionally, the project's landscape plan includes planting of native species along the river in the MHPA, including within the no use buffer and the Riverwalk River Park. Therefore, impacts to the MHPA from the potential spread of invasive plant species would be less than significant.

The MSCP LUAGs require that no invasive, non-native plant species be introduced into areas adjacent to the MHPA. The project would follow Landscape Standards of the City's Land Development Code and would not use invasive species, which would prevent their introduction to areas 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 and 3 would be combined into one zone (Zone 2) and 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 would 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 would not be greater in size than 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 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 would be the responsibility of a homeowner's association or other private party.*

As described in Section 5.16.1.6, a portion of the site is mapped within the VHFHSZ located along the San Diego River which traverses the project site. The City's Municipal Code requires brush management review on properties mapped within the VHFHSZ where habitable structures are located within 100 feet of areas with native and naturalized vegetation. Standard brush management zones consist of a 35-foot Zone One with a corresponding 65-foot Zone Two as measured from the façade of habitable structures. Modification of these standard zone widths is built into the brush management regulations.

Per Section 142.0412(f), the Zone Two width may be decreased by 1½-feet for each 1-foot increase in Zone One width. Under this allowance, where Zone One is expanded to 79 feet, Zone Two would be 0 feet. No formalized Brush Management program would be required beyond a 79-foot Zone One. Most structures within the project would be sited over 79-feet from the native and naturalized condition, separated from the fuel load through a combination of parcel setbacks and developed fire breaks such as the MTS Green Line Trolley tracks, the proposed Riverwalk River Park, the San Diego River Pathway, and various trails. Where the Zone One width is reduced, or where the equivalency of full brush management is not achieved per Section 142.0412(f), a project would be subject to alternative compliance measures as allowed under Section 142.0412(i) and in conformance with FPB Policy B-18-01. Development within Lots 36 through 40 would be separated from the native and naturalized condition by a brush management Zone One varying from 25 feet to 79 feet with no Zone Two, and therefore subject to alternative compliance. With implementation of alternative compliance measures, the project would meet the purpose and intent of the brush management regulations.

Grading/Land Development. *Manufactured slopes associated with site development shall be included within the development footprint for projects within or adjacent to the MHPA.*

The project has been designed to include all site development slopes within the development footprints. Therefore, impacts to the MHPA due to grading and land development would be less than significant.

MSCP General Planning Policies and Design Guidelines

Section 1.4.1 of the City's Subarea Plan states that the following land uses are conditionally compatible with the biological objectives of the MSCP and would be allowed within the MHPA:

- Passive recreation
- Utility lines and roads in compliance with policies in Section 1.4.2 of the City's Subarea Plan
- Limited water facilities and other essential public facilities
- Limited low density residential uses
- Brush Management (Zone 2)
- Limited agriculture

Passive recreation is the only conditionally compatible project component in the MHPA. The passive recreation proposed as passive park use is compatible with the biological objectives of the City's MSCP Subarea Plan (City 1997) and MHPA; therefore, it is an appropriate use adjacent to the MHPA. The passive park also acts as a biological buffer (in addition to the 50-foot no use buffer) between the preserved/restored habitat along the San Diego River Channel/MHPA and active park and development areas.

General planning policies and design guidelines for development are outlined in Section 1.4.2 of the City's MSCP Subarea Plan. These policies and guidelines apply to new roads and utilities; fencing, lighting, and signage; materials storage; mining, extraction, and processing facilities; and flood control within or adjacent to the MHPA. The project does not include mining facilities; thus, this section of the general planning policies and design guidelines is not applicable to the project. The project is required to comply with policies and design guidelines relevant to new roads and utilities; fencing, lighting, and signage; materials storage; and flood control. Conformance with these guidelines is presented below.

Roads and Utilities – Construction and Maintenance Policies.

1. *All proposed utility lines should be designed to avoid or minimize intrusion into the MHPA.*

No utility lines would intrude upon the MHPA; all lines would be within the proposed development outside the MHPA.

2. *All new development for utilities and facilities within or crossing the MHPA shall be planned, designed, located, and constructed to minimize environmental impacts. If avoidance is infeasible, mitigation would be required.*

Facilities within the MHPA associated with the project are two existing bridges (and their proposed, attached trails) and the Fashion Valley Road (arch culvert) improvements. Existing utilities that are currently in Fashion Valley Road would remain and be connected underneath the arch culvert. Much of the impact from construction of the arch culvert is temporary (0.30 acre), buried below ground, and would not be identifiable a few years after construction due to revegetation with natives as required by project mitigation. Permanent impacts (0.34 acre) would occur from retaining walls that would have buried footings and/or piles similar to the arch culvert. The proposed grading would be needed (unavoidable) to ensure the integrity of the arch culvert and to protect adjacent properties should there be a major flood. Sufficient cleared work space would be needed (unavoidable) for excavation and diverting the river so the contractor can get in and get out as quickly as possible in order to minimize potential construction and flooding issues, as well as time spent working in the river (estimated to be approximately seven months). As a result of the proposed improvements to Fashion Valley Road, direct impacts to native habitats would occur and would require mitigation, as presented in Section 5.4, *Biological Resources*.

3. *Temporary construction areas and roads, staging areas, or permanent access roads must not disturb existing habitat unless determined to be unavoidable.*

The only temporary construction area for the project where existing habitat would be disturbed is that of the Fashion Valley Road improvements, and the temporary construction impacts are unavoidable as described above (under number 2). All other temporary use areas/features and permanent access roads would be located within urban/developed land on site.

4. *Construction and maintenance activities in wildlife corridors must avoid significant disruption of corridor usage.*

As presented in Section 5.4, *Biological Resources*, a wildlife corridor exists on-site as the San Diego River channel, some of which lies within the MHPA. Wildlife movement along the river channel is currently constrained by the existing golf course, which abuts the northern and southern edges of the river and is comprised of wide-open greens that do not provide any protective cover.

According to General Planning Policies and Design Guidelines (Roads and Utilities) in Section 1.4.1 of the City's MSCP Subarea Plan, *[e]xisting roads and utility lines are usually considered a compatible use in the MHPA*. The construction of Fashion Valley Road would include a spanned crossing feature with a soft-bottomed area beneath the roadway that would be larger than the existing culverts and, thus, more conducive to wildlife movement.

Furthermore, sufficient cleared work space would be created for excavation and diverting the river so the contractor can get in and get out as quickly as possible in order to minimize potential construction and flooding issues, as well as time spent working in the river (estimated to be approximately seven months), which would minimize impacts to corridor usage. Maintenance activities on the existing roadway are expected to be infrequent and short in duration and would be a compatible MHPA use. Therefore, construction and maintenance activities associated with Fashion Valley Road would not cause significant disruption of corridor usage. No significant impact to wildlife movement would occur.

5. *Roads in the MHPA will be limited to those identified in Community Plan Circulation Elements, essential collector streets, and necessary maintenance/emergency access roads.*

The project does not propose any new roadways in the MHPA.

6. *Development of roads in canyon bottoms should be avoided whenever feasible. If an alternative location outside the MHPA is not feasible, then the road must be designed to cross the shortest length possible, and if a road crosses the MHPA, it should provide for fully-functional wildlife movement capability.*

The project site is a large, relatively level property within Mission Valley. No major topographic features (such as canyons, ravines, etc.) occur on or in close proximity of the project site. The project does not propose construction of any roads in canyon bottoms.

7. *Where possible, roads within the MHPA should be narrowed from existing design standards to minimize habitat fragmentation and disruption of wildlife movement and breeding areas. Roads must be located in lower quality habitat or disturbed areas to the extent possible.*

The project includes modifications to Fashion Valley Road to improve this existing crossing of the San Diego River in a manner that avoids habitat impacts to the maximum extent possible. The majority of the impacts to construct the roadway improvements would be within the existing Fashion Valley Road, which is urban/developed land. The existing roadway culverts would be replaced with an arch span crossing, leaving an earthen-bottomed channel. The new spanned crossing would improve flood flows along the river and provide for wildlife movement.

8. *For the most part, existing roads and utility lines are usually considered a compatible use in the MHPA and therefore, will be maintained.*

Fashion Valley Road is an existing roadway that crosses the MHPA, which would be modified with a spanned arch design to improve flood flows along the San Diego River. The spanned design would also provide for improved wildlife movement capability. Construction impacts have been minimized to the maximum extent feasible with most of the impacts occurring within the existing roadway to urban/developed land. Impact to habitat that would occur, has also been minimized with much of it being temporary in nature, and all habitat impacts would be mitigated via on-site restoration. The Fashion Valley Road improvements, therefore, would be compatible with the biological objectives of the MSCP for the MHPA in that the improvements and habitat restoration would: 1) ensure the long-term viability and sustainability of the native ecosystem function and natural processes associated with the San Diego River and 2) restore native plant associations and functional wildlife connections to provide viable wildlife and sensitive species habitat. As a result of the proposed improvements to Fashion Valley Road and as presented above, direct impacts to native habitats would occur and would require mitigation, as presented in Section 5.4, *Biological Resources*.

Fencing, Lighting, and Signage.

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

The project would utilize and maintain existing bridges in the MHPA and would create MSCP-compliant trails and passive uses on-site within the MHPA. Per the City's Subarea Plan, passive recreation and trails are compatible with the biological objectives of the MSCP and,

therefore, are allowed in the MHPA. Where trails are located within the MHPA, split-rail fencing and signage are proposed to be installed along either side of each trail to discourage trespass into the sensitive habitats within the MHPA. Active park uses would not occur adjacent to the MHPA. Boulders or deterrent vegetation, as well peeler log fencing, would be installed to deter entrance into the 50-foot no use buffer around the MHPA and wetland restoration areas. If constructed, the dog parks would be located in the active park, which is not adjacent to the MHPA, and would be fenced. Therefore, significant impacts to the MHPA from public access/use are not anticipated.

2. *Lighting shall be designed to avoid intrusion in the MHPA.*

The Riverwalk River Park would be a dawn-to-dusk facility and is within the floodway, which includes the MHPA. Lighting would not be provided in the floodway. Any other project lighting installed, however, would be shielded, as necessary, to prevent light from spilling into the MHPA. Shielding would consist of the installation of fixtures that physically direct light away from the outer edges of the MHPA or landscaping, berms, or other barriers that prevent such light overspill. Final project plans would depict the shielded light fixtures or other mechanisms used to protect the MHPA from night lighting, and the lighting used will adhere to the City's Outdoor Lighting Regulations (SDMC §142.0740) Compliance with lighting regulations would be a condition of approval for the project.

3 *Signage will be limited to access, litter control, and educational purposes.*

The final Riverwalk River Park design would include signs for limiting access, litter control, and educational purposes. Signage appropriate for its location is proposed to be placed: 1) along split-rail fencing installed along the trails that occur within the MHPA; 2) along the peeler log fencing installed at the edge of the 50-foot no use buffer; and 3) at nature observation nodes with educational kiosks. The signage would discourage trespass, littering, dumping, feeding of wildlife, collecting wildlife; would note that dogs must be leashed and are not allowed in the MHPA (except on the bridges/trail segments passing through the MHPA); and would educate River Park users of the sensitivity and importance of the natural resources associated with the San Diego River. While not adjacent to the MHPA, the fenced dog parks would include signs that state dogs may only be unleashed within the fenced dog park areas and that dog waste must be collected and disposed of immediately and appropriately by their handlers. The dog parks also would include trash receptacles and dog waste bag dispensers, Compliance with the guidelines would be a condition of approval for the project.

Materials Storage. *Storage of materials (e.g., hazardous or toxic chemicals, equipment, etc.) would not be located within the MHPA, and proper storage of such materials is required per applicable regulations in any areas that may impact the MHPA, especially due to potential leakage.*

No storage is proposed within the MHPA. All storage for construction, on-site business, or residential uses will be done in accordance with relevant materials safety regulations. During construction, laydown areas, material stockpiles, vehicle parking, and construction trailers would be located within the limits of the project development areas. None of these interim construction uses would occur within the MHPA or the project mitigation/restoration areas. As the future development would be phased, the exact construction staging and laydown areas would be dependent upon the portion of the site that is being developed. Additionally, all construction uses must incorporate appropriate BMPs to ensure that there are no indirect effects to adjacent MHPA areas.

Flood Control.

1. *Flood control should generally be limited to existing agreements with resource agencies unless demonstrated to be needed based on a cost benefit analysis and pursuant to a restoration plan. Floodplains within the MHPA, and upstream from the MHPA if feasible, should remain in a natural condition and configuration in order to allow for the ecological, geological, hydrological, and other natural processes to remain or be restored.*

The Riverwalk River Park portion of the project includes grading on-site for flood control purposes and planting of native wetland species to create native habitats adjacent to the San Diego River and the existing wetlands in the southwestern portion of the project site. The work involves removal of the golf course facilities and grading of the areas adjacent to the river channel to achieve the target elevations for wetland restoration. Planting of native species as well as development of the Riverwalk River Park is expected to occur soon after the grading. These activities would allow for the natural processes of the floodplain to be restored.

Fashion Valley Road improvements are to a low water crossing of the San Diego River, and a spanned (i.e., bridge) solution is not possible without significantly raising the entire profile of the roadway, which is not feasible due to adjacent property and MTS bridge constraints. The proposed use of the arch culvert solution would improve river flow and street operations through the replacement of the existing pipe culverts with the arch culvert.

The majority of the impacts from construction of the arch would be temporary, buried below ground, and would not be identifiable a few years after construction due to revegetation with natives. As evaluated in Section 5.4, *Biological Resources*, permanent impacts would occur from retaining walls that could have buried footings and/or piles similar to the arch. The proposed grading would be needed to ensure the integrity of the arch structure and to protect adjacent properties should there be a major flood. Sufficient cleared work space would be needed for excavation and diverting the river so the contractor can get in and get out as quickly as possible in order to minimize potential construction and flooding issues, as well as time spent working in the river (estimated to be approximately seven months).

2. *No berming, channelization, or man-made constraints or barriers to creek, tributary, or river flows should be allowed in any floodplain within the MHPA unless reviewed by all appropriate agencies, and adequately mitigated. Review must include impacts to upstream and downstream habitats, flood flow volumes, velocities and configurations, water availability, and changes to the water table level.*

The project does not propose berming, channelization, or manufactured constraints to flows in the floodplain. Rather, grading on-site (in urban/developed land cover) for the parks and wetland restoration areas would include planting of native wetland species that would allow for the natural processes of the floodplain to be restored. In short, the restoration work is intended to increase habitat on-site and accommodate river flood flows. The grading (of urban/developed land cover), which would become passive park area, is also intended to convey flood flows and provide native habitat. Areas to become active park also would involve grading of urban/developed land cover to accommodate flooding. All of this grading would occur in what is presently golf course and would not include any impacts to the wetlands in the San Diego River channel.

Furthermore, Fashion Valley Road improvements would replace the existing pipe culverts with an arch culvert (soft bottom) that would improve river flow and, therefore, would support river flows. As evaluated in Section 5.4, *Biological Resources*, construction for the Fashion Valley Road arch culvert would include both temporary and permanent impacts.

3. *No riprap, concrete, or other unnatural material shall be used to stabilize river, creek, tributary, and channel banks within the MHPA. River, stream, and channel banks shall be natural, and stabilized where necessary with willows and other appropriate native plantings. Rock gabions may be used where necessary to dissipate flows and should incorporate design features to ensure wildlife movement.*

The Riverwalk River Park portion of the project includes planting of native wetland species to create native habitats adjacent to the San Diego River. All temporary impacts from Fashion Valley Road improvements would also be revegetated with native wetland species.

General Management Directives

Mitigation. *Mitigation, when required as part of project approvals, shall be performed in accordance with the City of San Diego Environmentally Sensitive Lands Ordinance and Biology Guidelines.*

The mitigation measures presented in Section 5.4, *Biological Resources*, have been formulated to satisfy the requirements of the City's MSCP Subarea Plan, as well as the City's Biology Guidelines and ESL regulations.

Restoration. *Restoration or revegetation undertaken in the MHPA shall be performed in a manner acceptable to the City. Where covered species status identifies the need for reintroduction and/or increasing the population, the covered species will be included in restoration/revegetation plans, as appropriate. Restoration or revegetation proposals will be required to prepare a plan that includes elements addressing financial responsibility, site preparation, planting specifications, maintenance, monitoring and success criteria, and remediation and contingency measures. Wetland restoration/revegetation proposals are subject to permit authorization by federal and state agencies.*

Mitigation for impacts to City Wetlands, wetland Waters of the U.S., and wetland Waters of the State are presented Section 5.4, *Biological Resources*, and would reduce significant impacts to below a level of significance. Additionally, habitat restoration conducted in compliance with MHPA Guideline B15 is addressed in the Conceptual Habitat Restoration Plan prepared for the project.

Public Access, Trails, and Recreation. *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.*

The project would utilize and maintain existing bridges in the MHPA, rather than create new habitat impacts in the MHPA, and proposed to create MSCP-compliant trails on site to direct public access for passive recreation purposes. Those trails would be constructed in urban/developed land. These features would control public access, and the River Park is expected to provide the public with sufficient opportunities to experience the benefits of the MHPA without trespassing into its sensitive habitats. Where the trails are located within the MHPA, split-rail fencing and signage are proposed to be installed along either side of each trail to discourage trespass into the sensitive habitats within the MHPA. Additionally, boulders or deterrent vegetation, as well peeler log fencing with signage, will be installed at the edge of the 50-foot no use buffer to deter entrance into the buffer, MHPA, and restoration areas. Signage will also be provided at nature observation nodes with educational kiosks. The final Riverwalk River Park design would include signs that follow this directive to discourage trespass, littering, dumping, feeding of wildlife, collecting wildlife, keeping pets on-leash, and would educate River Park users of the sensitivity and importance of the natural resources associated with the San Diego River and MHPA as a condition of project approval.

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 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.

The project would utilize and maintain existing bridges in the MHPA and proposes to construct MSCP-compliant trails associated with the existing bridges. The trails would not meander through the MHPA but, rather, would lead directly through the MHPA and the 50-foot no use buffer and into the passive and active park components of the River Park. No other trails (or trail segments) are proposed within the MHPA.

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 cross joints, edge plantings of native grasses, and mulching of the trail.

Pursuant to the City's MSCP Subarea Plan, the trails proposed would not be paved and would utilize materials acceptable in the floodplain. These features would control public access. As stated previously, where the trails are located within the MHPA, split-rail fencing and signage are proposed to be installed along either side of each trail to discourage trespass into the sensitive habitats within the MHPA. Additionally, boulders or deterrent vegetation, as well peeler log fencing with signage, will be installed at the edge of the 50-foot no use buffer to deter entrance into the buffer, MHPA, and restoration areas.

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.

The proposed trails would not exceed four feet in width (except where they approach the existing bridges and would widen to the bridge width). Where the trails are located within the MHPA, split-rail fencing and signage are proposed to be installed along either side of each trail to discourage trespass into the sensitive habitats within the MHPA.

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.

The project does not include equestrian trails.

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.

Off-road and cross-country vehicle activity within the MHPA is not expected with implementation of the project.

Limit recreational uses to passive uses such as birdwatching, 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.

The project would utilize and maintain existing bridges in the MHPA. No developed picnic areas are proposed within or adjacent to the MHPA. Pets, where allowed, within or adjacent to the MHPA would be restrained on leashes or within an enclosed dog park.

Remove homeless and itinerant worker camps in habitat areas as soon as found pursuant to existing enforcement procedures.

Homeless camps, should they be discovered during habitat restoration efforts, would be removed in coordination with local law enforcement.

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.

The project does not include equestrian trails.

Litter/Trash and Materials Storage. *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.*

The project would install signage and trash receptacles to minimize littering. Trash receptacles would have covers to prevent rummaging by wildlife and would be located in proximity to potential picnic areas and other seating areas. Litter and trash removal within the MHPA and adjacent park space would be the responsibility of the land management entity. The dog parks would include trash receptacles and dog waste bag dispensers and be cleaned and maintained by the City per standard City dog park requirements and guidelines.

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.

The land management entity would be responsible for imposing penalties for littering and dumping within the MHPA.

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.

No storage is proposed within the MHPA or the Riverwalk River Park. All storage for construction, on-site business, or residential uses would be done in accordance with relevant materials safety regulations.

Keep wildlife corridor undercrossings free of debris, trash, homeless encampments, and all other obstructions to wildlife movement.

The project would remove debris, trash, homeless encampments, and other obstructions to wildlife movement during habitat restoration efforts. The land management entity would be responsible for long-term management within the Riverwalk River Park, including the MHPA.

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.

Boulders or deterrent vegetation, as well as peeler log fencing, would be installed at the edge of the 50-foot no use buffer to deter entrance into the buffer, MHPA, and restoration areas. The land management entity would be responsible for long-term monitoring of illegal dumping within the Riverwalk River Park, including MHPA areas that are not managed by a mitigation banking entity. Litter, trash, and materials storage associated with project construction would be addressed through the City's general construction requirements. Litter and trash associated with use of the bridges and trails in the River Park and MHPA would be the responsibility of the land management entity.

Adjacency Management Issues. *Enforce, prevent and remove illegal intrusions into the MHPA (e.g., orchards, decks, etc.) on an annual basis, in addition to complaint basis.*

Boulders or deterrent vegetation, as well as peeler log fencing, would be installed at the edge of the 50-foot no use buffer to deter entrance into the buffer, MHPA, and restoration areas. Enforcement and removal of illegal intrusions into the MHPA would be the responsibility of the land management entity.

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.

The project would include installation of signage in park areas to inform the public of the MHPA and the sensitive resources that exist therein. Management of projects developed within Riverwalk would be responsible for distributing additional information, as deemed necessary.

Install barriers (fencing, rocks/boulders, vegetation) and/or signage where necessary to direct public access to appropriate locations.

Boulders or deterrent vegetation, as well peeler log fencing with signage, would be installed at the edge of the 50-foot no use buffer to deter entrance into the buffer, MHPA, and restoration areas.

Invasive Exotics Control and Removal. *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.*

The project would remove invasive species during habitat restoration efforts. In addition, the Conceptual Landscape Plan prepared for the project avoids the use of exotic species within and adjacent to the MHPA. Non-native plant species potentially introduced via human use of trails and park space would be treated before proliferation into sensitive areas through ongoing maintenance of the park space by the land management entity.

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.

The project would remove non-native species from the MHPA during habitat restoration and enhancement efforts. The removal would begin at the upstream portion of the San Diego River on site where the Project mitigation area lies and move downstream into the other restoration areas. Removal efforts will be made by hand or with small machinery (e.g., line trimmers) whenever possible, but focused herbicide application may be used if needed. All restoration activities, including removal efforts, would avoid the nesting seasons of the least

Bell's vireo and light-footed Ridgway's rail (March 15 through September 15) and southwestern willow flycatcher (May 1 through September 1) should any of those species be present as determined during a protocol, pre-restoration activity survey. Maintenance and monitoring of the restoration would occur for a period of five years to ensure that weed cover success criteria are met. Long-term monitoring and maintenance of the habitat restoration will be the responsibility of the City, a mitigation banking entity, or other approved land management entity. A Habitat Restoration Plan has been prepared for the project and would be implemented as a project requirement.

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 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.

The project's Habitat Restoration Plan calls for five years of monitoring and maintenance of restoration and enhancement areas (unless success criteria are met sooner). Further monitoring and maintenance of non-native species within the MHPA would be the responsibility of the land management entity.

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.

The project does not include staging of cattle, horses, or other animals. However, brown-headed cowbirds (a nest parasite) have been observed on-site. Brown-headed cowbirds would likely continue to occupy the site following implementation of the project. Because cowbird presence is part of the existing conditions on-site, the project would conduct cowbird monitoring and control during the maintenance and monitoring period of the wetland habitat restoration. Any further cowbird control would be the responsibility of the land management entity.

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.

The project would comply with Guideline B15 through removal of invasive, non-native plant species (including any Eucalyptus spp.) from within the MHPA and through focused planting of native species along the San Diego River on-site in the MHPA. The project would not plant any new eucalyptus trees within the MHPA.

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.

In order to discourage excessive predation of sensitive species by non-native predators, such as feral cats, all trash containers associated with the development project would be secured, and trash would be disposed of on a regular schedule such that containers would not overflow. In the park, trash receptacles would have covers to prevent rummaging by wildlife and would be located in proximity to potential picnic areas and other seating areas. Litter and trash removal within the MHPA and park space would be the responsibility of the land management entity. The City should implement a monitoring program on a specified schedule for numbers of mesopredators and implement mesopredator control, as needed.

Flood Control. *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, light-footed Ridgway's rail, and southwestern willow flycatcher the non-breeding season generally includes September through mid-March.*

This directive would be followed for Fashion Valley Road maintenance.

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.

There are no existing flood control channels on the project site, and none would be constructed as part of the project.

Significance of Impacts

The project would be consistent with the MHPA LUAGs, as well as conform to the ASMDs and indirect impacts to the MHPA would be avoided. Therefore, the project, as designed, would not

conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or State habitat conservation plan.

Mitigation Measures

No mitigation is required.

5.1.3.6 Issue 6

Issue 6 Would the project result in exposure sensitive receptors due to current or future noise levels that would exceed standards established in the Noise Element of the General Plan?

Impact Threshold

A project could have a significant land use impact if it would expose new development to noise levels at exterior use areas or interior areas in excess of the noise compatibility guidelines established in the City General Plan Noise Element (shown in Table 5.1-4). Exterior noise levels at offices and retail establishments of 65 to 75 dBA are conditionally compatible with the General Plan provided interior noise levels can be attenuated to 50 dBA or less. Exterior noise levels of 60 CNEL are considered compatible with the multi-family residential land uses and exterior noise levels of 70 CNEL are considered conditionally compatible. Exterior noise levels at parks or other outdoor recreation areas are compatible up to 70 dBA and conditionally compatible up to 75 dBA.

For outdoor uses at a conditionally compatible multi-family residential land use, feasible noise mitigation techniques should be analyzed and incorporated to make the outdoor activities acceptable. For indoor uses at a conditionally compatible land use, exterior noise must be attenuated to approximately 60 CNEL in order to attain interior noise levels of 45 CNEL for residential uses using typical construction techniques. The General Plan identifies typical noise attenuation methods for achieving compliance. These include four basic methods: (1) reducing the sound level of the noise generator, (2) interrupting the noise path between the source and receiver, (3) increasing the distance between the source and receiver, and (4) insulating the receiver using specific building materials and construction methods.

Analysis

As shown in Table 5.1-4, *City of San Diego Noise Compatibility Guidelines*, exterior noise levels at offices and retail establishments of 65 to 75 dBA are conditionally compatible with the General Plan, provided interior noise levels can be attenuated to 50 dBA or less. With implementation of construction techniques and materials consistent with California Energy Code Title 24 requirements, interior noise levels at retail and office buildings would be below 50 dBA; and thus, consistent with the General Plan. Pursuant to the General Plan Noise Compatibility Guidelines, the City's exterior noise level for multi-family residences should not exceed 70 dBA CNEL. However, the Motor Vehicle Traffic Noise section of the Noise Element of the City's General Plan, provides that, *although not generally considered compatible, the City conditionally allows multiple unit and mixed-use residential uses*

up to 75 dBA CNEL in areas affected primarily by motor vehicle traffic noise with existing residential uses. Any future residential use above the 70 dBA CNEL must include noise attenuation measures to ensure an interior noise level of 45 dBA CNEL and be located in an area where a community plan allows multiple unit and mixed-use residential uses. For parks and active and passive recreation, based on the City's Noise Compatibility Guidelines, those uses would be compatible with noise levels up to 70 dBA and conditionally compatible with noise levels up to 75 dBA.

Typical residential construction in California provides a noise reduction of approximately 10 to 15 dBA of exterior noise sources with windows partially open, and approximately 20 to 25 dBA of noise reduction with windows kept closed. Thus, as a rule of thumb, where exterior noise levels are below 65 dBA CNEL, interior noise levels for new construction would typically meet the interior 45-dBA CNEL standard established in CCR Title 24. Additionally, where exterior noise levels are 65 to 70 dBA CNEL, interior noise can be reduced with standard wall and window construction, and the inclusion of mechanical forced-air ventilation to allow occupants the option of maintaining windows closed to control noise. Where exterior noise levels exceed 70 dBA CNEL, residential units would not normally be able to meet the 45-dBA CNEL interior standard through typical construction methods. Thus, noise-sensitive uses located where exterior noise levels exceed 70 dBA CNEL may require additional noise-reduction measures during construction, such as windows and doors with high STC ratings to meet the 45-dBA CNEL criteria. Therefore, the areas exceeding 65 dBA CNEL would require the building and window soundproofing project design features during construction to achieve the interior noise level standards of 45 dBA CNEL.

As part of the Noise Report prepared for the project (Birdseye Planning Group, May 2020), noise levels were calculated for future development within the North, Central and South Districts and at nearby sensitive receptors. (See Section 5.8, *Noise*, for a discussion of noise monitoring, monitoring locations, and results.) Existing measured noise levels along Friars Road where retail, office, and residential uses are planned within the North District were calculated to be approximately 69 dBA. Interior to the site where the retail, office, and residential uses are planned for the Central District, existing noise levels are calculated to be approximately 60 dBA. Along Hotel Circle North where office development is planned but where retail and residential uses can also occur, existing noise levels are calculated to be approximately 73 dBA. Thus, existing noise levels are below the General Plan Noise Compatibility Guidelines for all uses planned for the North and Central Districts. Uses planned for the South District would also be compatible with the General Plan Noise Compatibility Guidelines, with the exception of residential uses that could occur in that area, as further discussed below.

Noise levels at receivers in the South District are dominated by traffic on I-8 and Fashion Valley Road; however, noise levels would not exceed the 75 dBA threshold. Relative to the project's interface with I-8 at the southern boundary, any future residential development that may occur in the South District is constrained by Riverwalk Specific Plan regulation Reg-194, which states *No residential balconies shall front I-8 in areas that exceed an exterior noise level of 70 dBA CNEL.* This

regulation further minimizes future residential exposure to exterior noise levels, including motor vehicle noise, of over 70 dBA CNEL.

The Riverwalk River Park would establish a park, with active and passive recreation areas and open space areas, along the San Diego River. As shown in Table 5.1-4, common indoor and outdoor noise levels for parks, active and passive recreation uses are compatible with noise levels up to 70 dBA CNEL and conditionally compatible with noise levels greater than 70 to 75 dBA CNEL. The southwest corner of the River Park would be close to the I-8 freeway; however, existing noise levels were calculated to be 60 dBA. This is due to existing commercial office buildings that separate the River Park from I-8 and screen noise from traffic on I-8. Thus, noise levels for the River Park would be compatible with the Noise Element of the General Plan.

Significance of Impacts

Interior noise levels for residential, retail, and office uses would meet General Plan standards with use of materials and methods required per Title 24 of the California Energy Code. Park areas are expected to remain at approximately 60 dBA which is below the 75-dBA compatibility threshold identified in the General Plan. Impacts would be less than significant.

Mitigation Measures

Mitigation would not be required.

Table 5.1-1. City of San Diego General Plan Analysis

Land Use and Community Planning Element	
City of Villages Strategy	
<i>Goal.</i> Mixed-use villages located throughout the City and connected by high-quality transit.	Consistent – The project would create an integrated mixed-use neighborhood, providing residential, employment, recreational, and commercial opportunities. A new Green Line trolley station would be provided, as well as a mobility hub, that would allow for connection to various mobility opportunities.
<i>Policy LU-A.2.</i> 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.	Consistent – The project site has been identified on the Village Propensity Map as having medium propensity. The site has been identified for dense, mixed-use development since the adoption of the Levi-Cushman Specific Plan in 1987. Therefore, the site has been identified as suitable for mixed-use development. Realization of the project as a mixed-use neighborhood would be consistent with this identification.
<i>Policy LU-A.4.</i> Locate village sites where they can be served by existing or planned public facilities and services, including transit services.	Consistent – The project site is located within proximity of existing transit services (in the form of bus routes along Fashion Valley Road, Friars Road, and Hotel Circle North, and Green Line trolley that runs through the project site) and public facilities and services. Additionally, the project would provide a new trolley station within the North District, central to the neighborhood.
<i>Policy LU-A.7.</i> Determine the appropriate mix and densities/intensities of village land uses at the community plan level, or at the project level when adequate direction is not provided in the community plan.	Consistent – Development mix and intensity has been selected to optimize the use of the project site and ensure a successful variety of uses.
<i>Policy LU-A.7.b.</i> Achieve transit-supportive density and design, where such density can be adequately served by public facilities and services[...] Due to the distinctive nature of each of the community planning areas, population density and building intensity will differ by each community.	Consistent – The Riverwalk Specific Plan would allow for development of a mixed-use neighborhood that would be at a transit supportive density. The Specific Plan area is located within a TPA. Implementation of the Specific Plan would result in 4,300 multi-family residential dwelling units with high-density zoning. These units would be located within less than a one-half mile radius (approximately 10-minute walk) of an existing or proposed transit stop.
Balanced Communities and Equitable Development	
<i>Goal.</i> Ensure diverse and balanced neighborhoods and communities with housing available for households of all income levels.	Consistent – The project would provide a variety of housing types and densities, resulting in a diverse and balanced neighborhood. <i>Goal 1: Provide housing opportunities for a variety of income levels</i> , of the Riverwalk Specific Plan further reinforces housing variety, as housing typology often varies by level of affordability. Additionally, Riverwalk would meet its
<i>Policy LU-H.1.d.</i> Ensure that neighborhood development and redevelopment addresses the needs of older people, particularly those disadvantaged by age, disability, or poverty.	

<i>Policy LU-H.2.</i> Provide affordable housing throughout the City so that no single area experiences a disproportionate concentration.	inclusionary housing requirement and provide 10 percent inclusionary affordable units on-site (see Section 7.2, <i>Affordable Housing</i> , of the Riverwalk Specific Plan). Together, these two factors support housing variability and affordability.
<i>Policy LU-H.3.</i> Provide a variety of housing types and sizes with varying levels of affordability in residential and village developments.	
<i>Policy LU-H.6.</i> Provide linkages among employment sites, housing, and villages via an integrated transit system and a well-defined pedestrian and bicycle network.	Consistent – Riverwalk's circulation network includes an integrated network of multi-use trails and bicycle routes. Additionally, the project would provide a new Green Line trolley station and a mobility hub.
<i>Policy LU-H.7.</i> Provide a variety of different types of land uses within a community in order to offer opportunities for a diverse mix of uses and to help create a balance of land uses within a community.	Consistent – The project would provide a variety of land uses, including residential, commercial, employment,, and recreational, resulting in a diverse and balanced neighborhood.
Environmental Justice	
<i>Goal.</i> Improve mobility options and accessibility in every community.	Consistent – Riverwalk would provide an additional Green Line trolley station within central Mission Valley. Additionally, a mobility hub would be provided to allow for multimodal transportation connectivity.
Mobility Element	
Walkable Communities	
<i>Goal.</i> A city where walking is a viable travel choice, particularly for trips of less than one-half mile.	Consistent – Riverwalk would integrate residential, commercial, employment, and recreational opportunities within a pedestrian- and transit-oriented neighborhood. With a central trolley station and an integrated network of multi-use pedestrian paths/trails, walking would be a safe and viable choice for residents, employees, and visitors of Riverwalk.
<i>Goal.</i> A safe and comfortable pedestrian environment.	
<i>Goal.</i> A complete, functional, and interconnected pedestrian network, that is accessible to pedestrians of all abilities.	
<i>Goal.</i> Greater walkability achieved through pedestrian-friendly street, site and building design.	
<i>Policy ME-A.2.d.</i> Implement Crime Prevention Through Environmental Design (CPTED) measures to reduce the threat and incidence of crime in the pedestrian environment.	Consistent – Riverwalk would create a safe and secure neighborhood through the provision of modern urban design practices. Additionally, the development of a mix of uses would provide for round-the-clock life in a manner that would promote safety.
<i>Policy ME-A.2.f.</i> Provide adequate levels of lighting for pedestrian safety and comfort.	Consistent – The project would provide lighting in accordance with Municipal Code regulations to ensure pedestrian safety in the evening hours. Lighting would be hierarchical, with pedestrian-level lighting provided along pedestrian travel ways and crossings. Lighting would be provided at all pedestrian access points to ensure safety.
<i>Policy ME-A.6.a.3.</i> Design grading plans to provide convenient and accessible pedestrian connections from new development to adjacent uses and streets.	Consistent – The Riverwalk conceptual trail and walkways plan, as show in Figure 3-4, Pedestrian Circulation, includes a variety of trails and pathways, complete with trail amenities and treated pedestrian crossings. These facilities would link pedestrians to

	all of Riverwalk's residential, employment, commercial, and park/open space uses.
<i>Policy ME-A.7.a.</i> Enhance streets and other public rights-of-way with amenities such as street trees, benches, plazas, public art or other measures including, but not limited to those described in the Pedestrian Improvement Toolbox, Table ME-1 [of the City of San Diego Mobility Element].	Consistent - The project includes a diverse landscaping palette in Chapter 6 of the Specific Plan to establish a varied and visually appealing streetscape and pedestrian experience. Street trees have been selected for their aesthetic character and canopy size to provide shade along Riverwalk's streets.
<i>Policy ME-A.7.b.</i> Design site plans and structures with pedestrian-oriented features.	Consistent - The project includes architectural articulations in the Specific Plan to establish a varied and visually appealing streetscape and pedestrian experience. These include lobbies that face the street, serve as the primary entrance/exit, and feature canopies; shade trees; outdoor seating in areas near building entrances and amenities; private patios; signage; enhanced paving in high traffic pedestrian areas; and storefront glass for resident amenities/retail to allow views to interior spaces.
<i>Policy ME-A.8.</i> 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 would create an integrated mixed-use neighborhood, providing residential, employment, recreational, and commercial opportunities. A new Green Line trolley station would be provided, as well as a mobility hub, that would allow for connection to various mobility opportunities.
Transit First	
<i>Goal.</i> An attractive and convenient transit system that is the first choice of travel for many of the trips made in the City.	Consistent - Mission Valley is served by the Green Line Trolley and numerous bus routes. Riverwalk would provide a new trolley station between existing transit centers at Fashion Valley to the east and Morena/Linda Vista to the west. This trolley station would provide convenient access to high-performing transit not only for Riverwalk residents, employees, and visitors, but also those within the surrounding community.
<i>Policy ME-3.9.b.</i> 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.	Consistent - The Riverwalk Specific Plan would create a new urban village centered around a new Green Line Trolley transit stop.
Street and Freeway System	
<i>Goal.</i> An interconnected street system that provides multiple linkages within and between communities.	Consistent - The roadway network as shown in Figure 3-8, <i>Vehicular Circulation Plan</i> , for Riverwalk would provide linkages to the existing surrounding community to the north, east, and south. Additionally, Riverwalk would provide a new interconnected street system within the project.
<i>Goal.</i> Safe and efficient street design that minimizes environmental and neighborhood impacts.	
<i>Policy ME-C.3.</i> Design an interconnected street network within and between communities, which includes pedestrian and bicycle access, while	Consistent - Riverwalk has been designed to support active transportation. The San Diego River Pathway within Riverwalk would connect to the

maintaining landform and community character impacts.	extension to the east. Other pedestrian and bicycle facilities connect to facilities outside Riverwalk.
Transportation Demand Management	
<i>Goal.</i> Expanded travel options and improved personal mobility.	Consistent – Development of Riverwalk would include motorized and non-motorized travel options. Non-motorized travel would be accommodated through a network of multi-use paths and a diverse bicycle network. Vehicular transportation would be optimized through an integrated circulation network.
<i>Policy ME-E.3.</i> Emphasize the movement of people, rather than vehicles.	
Bicycling	
<i>Goal.</i> A safe and comprehensive local and regional bikeway network.	Consistent – The bicycle circulation plan, shown in Figure 3-6, <i>Bicycle Circulation Plan</i> , includes a variety of bicycle transportation options. Local facilities would tie into regional facilities provided within surrounding roadways, such as the Friars Road cycle track and the San Diego River Pathway.
Parking Management	
<i>Goal.</i> New development with adequate parking through the application of innovative citywide parking regulations.	Consistent – Riverwalk parking would be provided in accordance with City policies and regulations. The Specific Plan includes policies in Section 6.5.3, <i>Parking</i> , that support adaptive parking requirements as regulations and technology changes.
<i>Goal.</i> Increased land use efficiencies in the provision of parking.	Consistent – The Riverwalk Specific Plan encourages the use of structured parking and shared parking to increase land use efficiencies.
Urban Design Element	
General Urban Design	
<i>Goal.</i> A built environment that respects San Diego's natural environment and climate.	Consistent – The Riverwalk Specific Plan has been designed to embrace the San Diego River, a feature of San Diego's natural environment. With regulations of the San Diego River Park Master Plan incorporated into Sections 6.5.16 and 6.5.17 of the Riverwalk Specific Plan, the built environment would be developed in a manner that is respectful of the San Diego River.
<i>Goal.</i> An improved quality of life through safe and secure neighborhoods and public places.	Consistent – Riverwalk would create a safe and secure neighborhood through the provision of modern urban design practices. Additionally, the development of a mix of uses would provide for round-the-clock life in a manner that would promote safety.
<i>Goal.</i> A pattern and scale of development that provides visual diversity, choice of lifestyle, and opportunities for social interaction.	Consistent – Due to the diverse mix of uses proposed for Riverwalk, the pattern of scale and development would be equally diverse. Lifestyle choices and opportunities for social interaction would also be provided due to the mixture of land use and development intensities.
<i>Goal.</i> A City with distinctive districts, communities, neighborhoods, and village centers where people gather and interact.	
<i>Goal.</i> Utilization of landscape as an important aesthetic and unifying element throughout the City.	Consistent –Landscaping within Riverwalk would provide a unifying element within these parks and

	open spaces areas. As detailed in Chapter 3 of the Riverwalk Specific Plan, the Specific Plan includes specific tree species for use in various areas, including along streets and entry drives and within the green belts, as well as specific planting palettes for high visibility areas, such as plazas, community landscaping, private interior courtyard landscaping, and barrier planting. By providing consistent landscaping within special thematic areas, the landscape of Riverwalk would act as a unifying element.
<i>Policy UD-A.3.</i> Design development adjacent to natural features in a sensitive manner to highlight and complement the natural environment in areas designated for development.	Consistent – Riverwalk’s urban development includes natural features with the Park District, buffered on either side by a no-use buffer, passive park, and active park use. This placement of the natural features within the center of the Park District separates the environment of the San Diego River from residential, commercial, and employment development. Development of the Park District would be undertaken in compliance with the San Diego River Park Master Plan, except as modified for project implementation, to be sensitive to and complement the natural environment of the river. See Sections 6.5.16 and 6.5.17 of the Riverwalk Specific Plan.
<i>Policy UD-A.4.</i> Use sustainable building methods in accordance with the sustainable development policies in the Conservation Element.	Consistent – The project would be designed to meet Title 24 requirements, which addresses sustainable development. The project would also incorporate sustainable building and site design by designing buildings that meet CALGreen, California Green Building Standards Code, reduce energy use through building orientation, construct and operate buildings using materials and methods that promote healthful indoor air quality, consider re-use of building materials, low wattage and/or LED light features, and use of low flow shower heads , faucets, and toilets. Discussion relative to the General Plan’s Conservation Element is provided in Section 5.9, <i>Greenhouse Gas Emissions</i> .
<i>Policy UD-A.5.</i> Design buildings that contribute to a positive neighborhood character and relate to neighborhood and community context.	Consistent – The Riverwalk Specific Plan includes policies and regulations that relate to edge conditions where future development is located abutting existing development. These policies and regulations allow Riverwalk to contribute positively to and relate to existing neighborhood character.
<i>Policy UD-A.5.d.</i> Encourage the use of materials and finishes that reinforce a sense of quality and permanence.	Consistent – Chapter 6 of the Riverwalk Specific Plan outlines the use of high-quality finishes, which would impart a sense of quality and permanence. Specifically, the Specific Plan states: <i>The buildings should feature enhanced and high-quality materials to encourage pedestrian activity and visual interest.</i>

<i>Policy UD-A.6.</i> Create street frontages with architectural and landscape interest to provide visual appeal to the streetscape and enhance the pedestrian experience.	Consistent – The project includes a diverse landscaping palette and architectural articulations in Chapter 6 of the Specific Plan to establish a varied and visually appealing streetscape and pedestrian experience. The public and private realms are defined through tree-lined public and private streets and plazas. Trees have been selected for their aesthetic character, their compatibility with the natural environment, and their potential for large canopy coverage to provide shade along Riverwalk's streets.
<i>Policy UD-A.8.</i> Landscape materials and design should enhance structures, create and define public and private spaces, and provide shade, aesthetic appeal, and environmental benefits.	
<i>Policy UD-A.8.b.</i> Use water conservation through the use of drought-tolerant landscape, porous materials, and reclaimed water where available.	Consistent – The project would provide an extensive and varied landscape palette that includes an array of drought-tolerant plants and inert material for water conservation and biofiltration.
<i>Policy UD-A.8.e.</i> Landscape materials and design should complement and build upon the existing character of the neighborhood.	Consistent – The project includes a diverse landscaping palette in Chapter 6 of the Specific Plan to establish a varied and visually appealing streetscape and pedestrian experience. Street trees have been selected for their aesthetic character and canopy size to provide shade along Riverwalk's streets.
<i>Policy UD-A.9.</i> Incorporate existing and proposed transit stops or stations into project design.	Consistent – Riverwalk includes a new Green Line trolley station within the center of the neighborhood.
<i>Policy UD-A.11.</i> Encourage the use of underground or above-ground parking structures, rather than surface parking lots, to reduce land area devoted to parking.	Consistent – The Riverwalk Specific Plan encourages structured parking to reduce the land area devoted to parking.
<i>Policy UD-A.12.</i> Reduce the amount and visual impact of surface parking lots.	
<i>Policy UD-A.13.</i> Provide lighting from a variety of sources at appropriate intensities and qualities for safety.	Consistent – The project would provide lighting in accordance with Municipal Code regulations to ensure pedestrian safety in the evening hours. Lighting would be hierarchical, with pedestrian-level lighting provided along pedestrian travel ways and crossings. Lighting would be provided at all pedestrian access points to ensure safety.
<i>Policy UD-A.17.</i> Incorporate Crime Prevention Through Environmental Design (CPTED) measures, as necessary, to reduce incidences of fear and crime, and design safer environments.	Consistent – The inclusion of a mix of uses that would provide for extended activity on the project site reduces the threat and incidence of crime. Additionally, the provision of residential units ensures greater “eyes on the street,” acting as passive threat reduction and crime deterrents. The project would provide lighting in accordance with Municipal Code regulations to ensure pedestrian safety in the evening hours. Lighting would be hierarchical, with pedestrian-level lighting provided along pedestrian travel ways and crossings. Lighting would be provided at all pedestrian access points to ensure safety.
Distinctive Neighborhoods and Residential Design	
<i>Goal.</i> A City of distinctive neighborhoods.	

<p><i>Goal.</i> Architectural design that contributes to the creation and preservation of neighborhood character and vitality.</p>	<p>Consistent – The Project would be a district architecturally-cohesive, mixed-use, in-fill neighborhood that would provide for a variety of land uses to create a unique community and contribute to the existing character of Mission Valley. The Riverwalk Specific Plan requires for high-quality finishes and thoughtful siting that respects the existing community while providing a new focal point for the community.</p>
<p><i>Goal.</i> Innovative design for a variety of housing types to meet the needs of the population.</p>	
<p><i>Goal.</i> Infill housing, roadways and new construction that are sensitive to the character and quality of existing neighborhoods.</p>	
<p><i>Goal.</i> Pedestrian connections linking residential areas, commercial areas, parks and open spaces.</p>	<p>Consistent – The Riverwalk conceptual trail and walkways plan, as show in Figure 3-4, <i>Pedestrian Circulation</i>, includes a variety of trails and pathways, complete with trail amenities and treated pedestrian crossings. These facilities would link pedestrians to all of Riverwalk's residential, employment, commercial, and park/open space uses.</p>
<p><i>Policy UD-B.1.</i> Recognize that the quality of a neighborhood is linked to the overall quality of the built environment. Project should not be viewed singularly, but viewed as part of the larger neighborhood or community plan area in which they are located for design continuity and compatibility.</p>	<p>Consistent – The Project would be an architecturally-cohesive, mixed-use, in-fill neighborhood that would provide for a variety of land uses to create a unique community and contribute to the existing character of Mission Valley. The Riverwalk Specific Plan outlines the use of high-quality finishes and thoughtful siting that respects the existing community providing for continuity and compatibility.</p>
<p><i>Policy UD-B.4.</i> Create street frontages with architectural and landscape interest for both pedestrians and neighboring residents.</p>	<p>Consistent – The project includes a diverse landscaping palette and architectural articulations in the Specific Plan to establish a varied and visually appealing streetscape and pedestrian experience. These include lobbies that face the street, serve as the primary entrance/exit, and feature canopies; shade trees; outdoor seating in areas near building entrances and amenities; private patios; signage; enhanced paving in high traffic pedestrian areas; and storefront glass for resident amenities/retail to allow views to interior spaces.</p>
<p><i>Policy UD-B.5.</i> Design or retrofit streets to improve walkability, strengthen connectivity, and enhance community identity.</p>	<p>Consistent – Riverwalk's street system incorporates sidewalks and connects to the multi-faceted pedestrian and bicycle network, which would promote connectivity between various project districts and with the surrounding community. This, in turn, would enhance the community identity.</p>
<p><i>Policy UD-B.8.</i> Provide useable open space for play, recreation, and social or cultural activities in multifamily as well as single-family projects.</p>	<p>Consistent – Riverwalk includes active and passive park elements, as well as plazas, mini parks, and pocket parks to facilitate all manner of outdoor gathering, activity, and enjoyment.</p>
<p>Mixed-Use Villages and Commercial Areas</p>	

<i>Goal.</i> Mixed-use villages that achieve an integration of uses and serve as focal points for public gathering as a result of their outstanding public spaces.	Consistent – The North District of Riverwalk would provide residential, commercial/employment, and outdoor gathering space. This mixed-use center of the neighborhood would provide for fully integrated uses and serve as the heart of the community. The Central and South Districts would also include an integrated mix of uses and public gathering spaces.
<i>Goal.</i> Vibrant, mixed-use main streets that serve as neighborhood destinations, community resources, and conduits to the regional transit system.	Consistent – Riverwalk would incorporate a “main street” element within the North District in the form of the internal spine street. This street would connect the land uses of the North District with park elements and outdoor gathering spaces, as well as the new Green Line trolley station.
<i>Goal.</i> Neighborhood commercial shopping areas that serve as walkable centers of activity.	Consistent – Riverwalk would allow for integration of neighborhood commercial shopping throughout the project site. Walkable centers of activity would be provided around the trolley station in the North District, the repurposed golf course clubhouse in the Central District, and the employment node in the South District.
<i>Policy UD-C.1.</i> In villages and transit corridors identified in community plans, provide a mix of uses that create vibrant, active places in villages.	Consistent – The Riverwalk Specific Plan would develop as a mixed-use urban village with integrated residential, commercial retail, office and non-retail commercial, and parks and open space uses.
<i>Policy UD-C.2.</i> Design village centers to be integrated into existing neighborhoods through pedestrian-friendly site design and building orientation, and the provision of multiple pedestrian access points.	Consistent – Section 6.6, <i>District Specific Guidelines</i> , of the Riverwalk Specific Plan includes policies and regulations that allow for respectful transitions between existing residential developments that interface with the Riverwalk development area and future buildings within the Specific Plan area.
<i>Policy UD-C.3.</i> Develop and apply building design guidelines and regulations that create diversity rather than homogeneity, and improve the quality of infill development.	<p>Consistent – Section 6.3.9, <i>Architectural Style and Development Aesthetics</i>, of the Riverwalk Specific Plan includes the following recommendations relative to development diversity:</p> <p><i>The building aesthetics within each of the Districts should complement each other, without resulting in homogeneity. This may include having similarly sized massing elements, materials, or overall building character. The buildings should feature enhanced and high-quality materials to encourage pedestrian activity and visual interest. The ground plane and the first floor of each building should be enhanced through architectural details, street furniture, and other amenities.</i></p>
<i>Policy UD-C.4.</i> Create pedestrian-friendly villages.	Consistent – Riverwalk’s pedestrian and bicycle networks, in addition to its transit opportunities and mix of uses, would create a pedestrian-friendly urban village.
<i>Policy UD-C.5.</i> Design village centers as civic focal points for public gatherings with public spaces.	Consistent – The heart of the Riverwalk Specific Plan is the Riverwalk River Park and the trolley stop.

	Design elements related to these components, as described in Chapter 6 of the Specific Plan, would create civic focal points for gatherings in public spaces.
<i>Policy UD-C.6.</i> Design project circulation for walkability.	Consistent – Riverwalk’s site design is centered on the pedestrian/bicycle network, as well as the Green Line Trolley station. Active transportation across San Diego River would be afforded by repurposed golf cart bridges and tunnels specifically for pedestrian and bicycle use.
<i>Policy UD-C.7.</i> Enhance the public streetscape for greater walkability and neighborhood aesthetics.	Consistent –The project includes a diverse landscaping palette and architectural articulations in the Specific Plan to establish a varied and visually appealing streetscape and pedestrian experience.
Office and Business Park Development	
<i>Goal.</i> Promote the enhanced visual quality of office and industrial development.	Consistent – The Riverwalk Specific Plan requires the same level of detail and quality of architecture and finishes for employment uses as the rest of the neighborhood. This would ensure the visual quality of any employment areas within Riverwalk, as well as continuity through Riverwalk.
<i>Goal.</i> Provide increased pedestrian and transit orientation within office and industrial developments.	Consistent – Employment may occur throughout Riverwalk, but may be concentrated in the southeastern portion of the site in the South District. This area would provide active transportation connections to the northern portion of the site via the pedestrian and bicycle network. This network would connect to the on-site trolley station. Pedestrian connections off-site would provide access to the Fashion Valley Transit Center and bus stops along Hotel Circle North, as well as to the eastern and western extensions of the San Diego River Pathway.
<i>Policy UD-D.1.</i> Provide expanded opportunities for local access and address the circulation needs of pedestrians within and among office and business park developments.	
<i>Policy UD-D.2.</i> Assure high quality design of buildings and structures. The design and orientation of buildings within projects affect the pedestrian- and transit-orientation.	Consistent – The Riverwalk Specific Plan requires the same level of detail and quality of architecture and finishes for employment uses as the rest of the neighborhood. This would ensure the visual quality of any employment areas within Riverwalk.
Public Spaces and Civic Architecture	
<i>Goal.</i> Significant public gathering spaces in every community.	Consistent – Public gathering spaces within Riverwalk would be provided in the form of the San Diego River channel, active and passive parks, pocket parks, mini parks and plazas. These spaces would be designed to provide their own distinct civic space and contribute to the distinctive character envisioned for Riverwalk by the Specific Plan.
<i>Policy UD-E.1.</i> Include public plazas, squares or other gathering spaces in each neighborhood and village center.	
Economic Prosperity Element	
Commercial Land Use	
<i>Goal.</i> Commercial development which uses land efficiently, offers flexibility to changing resident and	Consistent – Proposed zoning for Riverwalk allows for commercial development to occur throughout the project site, as stand-alone establishments or

business shopping needs, and improves environmental quality.	integrated into mixed-use buildings. This allows for land efficiency and maximum flexibility in response to resident demand, business needs, and market fluctuations.
<i>Goal.</i> Economically healthy neighborhood and community commercial areas that are easily accessible to residents.	Consistent – Commercial development within Riverwalk would be provided on a variety of scales, which would allow for small business opportunities. Additionally, the provision of large and small commercial space integrated into and in proximity to residential development further promotes small businesses, home-based employment, and entrepreneurship.
<i>Goal.</i> New commercial development that contributes positively to the economic vitality of the community and provides opportunities for new business development.	
Employment Development	
<i>Goal.</i> A city with an increase in the number of quality jobs for local residents, including middle-income employment opportunities and jobs with career ladders.	Consistent – Employment uses within Riverwalk would be varied, ranging from retail and service employment to business park and office uses. This variety of uses provides for middle-income employment, as well as career opportunities.
Public Facilities, Services, and Safety Element	
Evaluation of Growth, Facilities, and Services	
<i>Goal.</i> Adequate public facilities that are available at the time of need.	Consistent – The project includes a phasing plan to ensure that adequate public facilities would be available at the time project development comes online.
<i>Policy PF-C.1.</i> Require development proposals to fully address impacts to public facilities and services.	Consistent – Project impacts to public facilities and services are addressed in Section 5.15 of this EIR.
Fire Rescue	
<i>Goal.</i> Protection of life, property, and environment by delivering the highest level of emergency and fire-rescue services, hazard prevention, and safety education.	Consistent – The project has been reviewed by the City's Fire-Rescue department. The project would not result in significant impacts to these services, and construction of new facilities would not be required for the project.
<i>Policy PF-D.12.a.</i> Assess site constraints when considering land use designations near wildlands to avoid or minimize wildfire hazards as part of a community plan update or amendment.	Consistent – Wildland fire hazard has been addressed in Section 5.16, <i>Health and Safety</i> , of this EIR.
<i>Policy PF-D.13.</i> Incorporate fire safe design into development within very high fire hazard severity zones to have fire-resistant building and site design, materials, and landscaping as part of the development review process.	The Landscape Regulations require brush management review on properties mapped within the Very High Fire Hazard Severity Zone (VHFHSZ) where habitable structures are located within 100 feet of areas with native and naturalized vegetation. Although this zone is mapped along the San Diego River which traverses the site, most structures within the project would be sited over 79 feet from the native/naturalized condition. In Lots 36 through 40 where development may be less than 79 feet from this wildland-urban interface, a modified Zone One would be implemented. The Zone One would consist of areas within the development footprint such as setbacks and developed fire breaks, in addition to alternative compliance measures to provide the

	equivalency of a full brush management defensible space program. Brush management would be implemented through both the Riverwalk Specific Plan (Section 5.3.4, <i>Brush Management</i>) and the VTM. Additionally, the project has been designed in accordance with and would be built to fire code requirements, including provision of fire hydrants and proper street access for emergency vehicles. The project has been reviewed by the City's Fire and Rescue Department, which has determined that the project is consistent with City regulations pertaining to Fire protection.
Police	
<i>Goal.</i> Safe, peaceful, and orderly communities.	Consistent – The project has been reviewed by the City's Police department. The project would not result in significant impacts to these services, and construction of new facilities would not be required for the project.
Storm Water Infrastructure	
<i>Goal.</i> Protection of beneficial water resources through pollution prevention and interception efforts.	Consistent – As evaluated in Section 5.14, <i>Water Quality</i> , the project would be developed with BMPs to ensure reduction in pollutants in urban runoff and storm water.
<i>Goal.</i> A storm water conveyance system that effectively reduces pollutants in urban runoff and storm water to the maximum extent practicable.	
Waste Management	
<i>Goal.</i> Maximum diversion of materials from disposal through the reduction, reuse, and recycling of wastes to the highest and best use.	Consistent – As evaluated in Section 5.13, <i>Public Utilities</i> , the project would not result in significant impacts to solid waste management.
Seismic Safety	
<i>Goal.</i> Development that avoids inappropriate land uses in identified seismic risk areas.	Consistent – As evaluated in Section 5.11, <i>Geologic Conditions</i> , development of the project would not result in significant impacts relative to seismic risk.
<i>Policy PF-Q.1.</i> Protect public health and safety through the application of effective seismic, geologic, and structural considerations.	Consistent – Potential project impacts relative to seismic and geologic constraints are discussed in Section 5.11, <i>Geologic Conditions</i> .
Recreation Element	
Recreational Opportunities	
<i>Goal.</i> A City with a diverse range of active and passive recreational opportunities that meet the needs of each neighborhood/community and reinforce the City's natural beauty and resources.	Consistent – The project would develop a diverse range of recreational elements, which include a park, pocket parks, mini parks, plazas, and an extensive trail system, as well as an open space river channel. These facilities would not only serve the project, but the greater Mission Valley community.
Preservation	
<i>Goal.</i> Preserve, protect and enrich natural, cultural, and historic resources that serve as recreational facilities.	Consistent – The project would provide an enhanced San Diego River channel through the center of the project site. Additionally, along the San Diego River channel, species of cultural significance

	would be called out and interpretive signage would be provided.
<i>Policy RE-C.2.</i> Protect, manage, and enhance population- and resource-based parks and open space lands through appropriate means which include sensitive planning, park and open space dedications, and physical protective devices.	Consistent – The Riverwalk Specific Plan incorporates the San Diego River as an integral component of the project. Project components, such as the no use buffer and mitigation bank would allow for protection and management of the San Diego River, while the wetland restoration would enhance this natural feature.
<i>Policy RE-C.5.</i> Design parks to preserve, enhance, and incorporate items of natural, cultural, or historic importance.	Consistent – The Riverwalk River Park would enhance the San Diego River channel, while providing buffer from more active recreational uses through buffer planting, fencing, and signage, as required by the San Diego River Park Master Plan. Additionally, along the San Diego River channel, species of cultural significance would be called out and interpretive signage would be provided.
Accessibility Goal	
<i>Goal.</i> Park and recreation facilities that are sited to optimize access by foot, bicycle, public transit, automobile, and alternative modes of travel.	Consistent – The Riverwalk River Park, the major park element of the project, would be accessed via a network of trails and walkways, vehicular roads, and the trolley station/transit. Other park elements within Riverwalk are also accessed through similar circulation elements.
<i>Goal.</i> Provision of an inter-connected park and open space system that is integrated into and accessible to the community.	Consistent – Riverwalk would develop a multi-faceted park system, including the expansive Riverwalk River Park, pocket parks, mini parks, and plazas. These parks are interconnected to each other and integrated into the community.
<i>Goal.</i> Recreational facilities that are available for programmed and non-programmed uses.	Consistent – Riverwalk's parks would be available to residents, visitors, and employees of Riverwalk, as well as community members of Mission Valley and the city as a whole.
<i>Policy RE-D.2.</i> Provide barrier-free trails and outdoor experiences and opportunities for persons with disabilities where feasible.	Consistent – Riverwalk's sidewalk network would be ADA accessible, as well the provided San Diego River Pathway.
<i>Policy RE-D.6.</i> Provide safe and convenient linkages to, and within, park and recreation facilities and open space areas.	Consistent – Riverwalk's park elements would be accessible via the pedestrian and vehicular network, and access points to the park elements would be clearly demarcated.
<i>Policy RE-D.6.a.</i> Provide pedestrian and bicycle paths between recreational facilities and residential development.	Consistent – Riverwalk's proposed pedestrian and bicycle circulation networks would connect to and through the Riverwalk River Park and to other park elements of the project.
<i>Policy RE-D.6.b.</i> Designate pedestrian and bicycle corridors, and equestrian corridors where appropriate, that link residential neighborhoods with park and recreation facilities, trails, and open spaces.	Consistent – Riverwalk's proposed pedestrian and bicycle network would link residential land uses to the park and open space elements of the project.
<i>Policy RE-D.6.c.</i> Improve public access through development of, and improvements to, multi-use	Consistent – The Riverwalk Specific Plan would implement the San Diego River Pathway on the north side of the San Diego River and would include

trails within urban canyons and other open space areas.	numerous trail throughout the Riverwalk River Park that would be accessible to pedestrians and bicyclists.
<i>Policy RE-D.6.f.</i> Identify key trails and access points as part of community plan updates, discretionary permit reviews, and other applicable land use and park planning documents.	Consistent – At the time development projects come forward within the Central and South Districts, access points would be clearly delineated to users of the trails within the Riverwalk River Park.
Open Space Lands and Resource-Based Parks	
<i>Goal.</i> An open space and resource-based park system that provides for the preservation and management of natural resources, enhancement of outdoor recreation opportunities, and protection of the public health and safety.	Consistent – The Riverwalk River Park would enhance the San Diego River channel, while providing buffer from more active recreational uses through buffer planting, fencing, and signage, as required by the San Diego River Park Master Plan. An integrated active transportation network and convenient access to transit would facilitate and promote public health and safety.
Conservation Element	
Climate Change and Sustainable Development	
<i>Goal.</i> To reduce the City's overall carbon dioxide 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 analyzed in Section 5.9, <i>Greenhouse Gas Emissions</i> , the project would be consistent with the City's Climate Action Plan, thereby resulting in reduced emissions and carbon footprint.
<i>Policy CE-A.5.</i> Employ sustainable or "green" building techniques for the construction and operation of buildings.	Consistent – The project would be designed to meet Title 24 requirements, which addresses sustainable development. The project would also incorporate sustainable building and site design by designing buildings that meet CALGreen, California Green Building Standards Code, reduce energy use through building orientation, construct and operate buildings using materials and methods that promote healthful indoor air quality, consider re-use of building materials, low wattage and/or LED light features, and use of low flow shower heads, faucets, and toilets.
<i>Policy CE-A.11.</i> Implement sustainable landscape design and maintenance.	Consistent – Riverwalk's landscape plan includes native, native-friendly, and drought-tolerant landscaping.
Urban Runoff Management	
<i>Policy CE-E.2.g.</i> Apply land use, site development, and zoning regulations that limit impacts on, and protect the natural integrity of topography, drainage systems, and water bodies.	Consistent – Project impacts relative to runoff and drainage are discussed in Section 5.12, <i>Hydrology</i> , of this EIR.
Urban Forestry	
<i>Goal.</i> Protection and expansion of a sustainable urban forest.	Consistent – Riverwalk would contribute to the fabric of the urban forest by planting with a landscape palette of native riparian trees along the San Diego River channel and thematic trees along roadways and within parks and plaza elements.

	<p>Additionally, a tree survey was undertaken for the project site. The tree survey was based on the southern-most 18 holes south of the trolley tracks. The tree survey excluded trees within the San Diego River channel. The existing tree survey yielded the following data:</p> <p>Area: 129.1 acres Approximate tree coverage: 8.6 to 12.1 acres Percentage: 6.7 percent to 9.4 percent tree canopy coverage.</p> <p>An estimation of the northern nine holes indicates that the percent coverage would be the same as the southern 18 holes. Therefore, it is estimated that the approximate canopy coverage for existing conditions, outside of the trolley track easement and San Diego River channel, is 6.7 percent to 9.4 percent for the entire golf course.</p> <p>As the Riverwalk River Park planting plan has not yet been finalized, tree coverage for the developed areas of the Specific Plan area was analyzed under the Riverwalk Specific Plan condition. The analysis yielded the following proposed tree survey:</p> <p>Area: 98.7 acres Approximate tree coverage: 19.6 acres (assumes an average tree canopy diameter of 30 feet at maturity) Percentage: 19.9 percent tree canopy coverage</p> <p>The above percentage is conservative and does not account for the Riverwalk River Park, which would provide an even greater amount of coverage with the addition of trees and shrubs throughout the park and revegetated areas.</p> <p>Action 5.1 of the CAP targets 15 percent urban tree canopy coverage citywide by 2020 and 35 percent urban tree canopy coverage citywide by 2035. Development areas of the Specific Plan area would achieve a minimum of approximately 20 percent tree canopy coverage, which would exceed the 2020 tree canopy coverage target and would contribute to the 2035 tree canopy coverage target. Although it is unknown at this time how much tree canopy would occur within the Riverwalk River Park and San Diego River channel, trees planted in those portions of the project site would increase the site's tree canopy coverage beyond the projected 20 percent. The</p>
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	project would positively contribute to the targeted tree canopy coverage percentages of the CAP.
<i>Policy CE-J.1.b.</i> Plant large canopy shade trees, where appropriate and with consideration of habitat and water conservation goals, in order to maximize environmental benefits.	Consistent – Large canopy trees would be a component of the Riverwalk Street Tree and Greenbelt plan, as well as within parks and open space areas.
<i>CE-J.1.c.</i> Seek to retain significant and mature trees.	Consistent – The Riverwalk Specific Plan contains the following discussion relative to existing trees on-site: <i>Existing on-site tree specimens will be analyzed on an individual basis for preservation in their present or in a new location to the greatest extent feasible. All efforts will be made to preserve mature trees where possible. Existing trees will be analyzed and assessed in accordance with Council Policy 900-19 and the Conserve-A-Tree Program.</i>
Noise Element	
Noise and Land Use Compatibility	
<i>Policy NE-A.2.</i> Assure the appropriateness of proposed developments relative to existing and future noise levels by consulting the guidelines for noise-compatible land use (General Plan Table NE-3) to minimize the effects on noise-sensitive land uses.	Consistent – As discussed in Section 5.1, <i>Land Use</i> and 5.8, <i>Noise</i> , the project would avoid noise impacts to the extent practicable, and would minimize unavoidable impacts through project design features such that no significant impacts occur. Existing noise levels do not exceed 75 dBA. Any future residential use above the 70 dBA CNEL must include noise attenuation measures to ensure an interior noise level of 45 dBA CNEL and be located in an area where a community plan allows multiple unit and mixed-use residential uses, as required by the General Plan. As such, the project would be consistent with General Plan Table NE-3.
<i>Policy NE-A.4.</i> Require an acoustical study consistent with Acoustical Study Guidelines for proposed developments in areas where the existing or future noise level exceeds or would exceed the “compatible” noise level thresholds as indicated on the Land Use – Noise Compatibility Guidelines (Table NE-3 of the General Plan), so that noise mitigation measures can be included in the project design to meet the noise guidelines.	
Motor Vehicle Traffic Noise	
<i>Policy NE-B.4.</i> Require new development to provide facilities which support the use of alternative transportation modes, such as walking, bicycling, carpooling, and, where applicable, transit to reduce peak-hour traffic.	Consistent – Riverwalk is designed around being supportive of active transportation, transit, and alternative transportation modes. The project would include an expansive and interconnected pedestrian and bicycle network. A new station for the Green Line trolley would be incorporated into the North District. Additionally, a mobility hub would be located in the project to provide connections to various transportation modes, including transit, bicycle and car/ride share, shuttle, and other transportation innovations as they become available.
Trolley and Train Noise	
<i>Goal.</i> Minimal excessive fixed rail-related noise on residential and other noise-sensitive land uses	Consistent – The Green Line Trolley runs east-west through the project site, delineating the North District from the Central District. Due to other site constraints, such as the San Diego River floodway, in order to maximize land use efficiency, the majority
<i>Policy NE-C.1.</i> Use site planning to help minimize exposure of noise sensitive uses to rail corridor and trolley line noise.	

	of the project's development intensity would be located in these two districts. Site planning includes buffer space adjacent to the trolley tracks to minimize noise and sound attenuation would be required to ensure no interior noise conflicts. Additionally, as presented in Section 5.8, <i>Noise</i> , noise impacts due to transit noise were found to be less than significant.
Commercial and Mixed-Use Activity Noise	
<i>Goal.</i> Minimal exposure of residential and other noise-sensitive land uses to excessive commercial and mixed-use related noise.	Consistent – Residential development would be sited in such a way to minimize conflicts with excessive noise uses. Due to the integrated, mixed-use nature of the project, avoidance of potential conflicts between residential and commercial land uses may not be possible. Where necessary, sound attenuation would be required to ensure no interior noise conflicts. As presented in Section 5.8, <i>Noise</i> , no interior noise impacts would result.
<i>Policy NE-E.1.</i> Encourage the design and construction of commercial and mixed-use structures with noise attenuation methods to minimize excessive noise to residential and other noise-sensitive land use.	
<i>Policy NE-E.2.</i> Encourage mixed-use developments to locate loading areas, parking lots, driveways, trash enclosures, mechanical equipment, and other noisier components away from the residential component of the development.	
Construction, Refuse Vehicles, Parking Lot Sweepers, and Public Activity Noise	
<i>Goal.</i> Minimal exposure of residential and other noise-sensitive land uses to excessive construction refuse vehicles, parking lot sweeper-related noise and public noise.	Consistent – As discussed in Section 5.8, <i>Noise</i> , the project's construction activities would occur during allowable times and generate sound levels below 75 dBA Leq (12 hours), in compliance with Section 59.5.404 of the City of San Diego Municipal Code. Any future parking lot street-sweeper activity would occur during allowable times.
Typical Noise Attenuation Methods	
<i>Goal.</i> Attenuate the effect of noise on future residential and other noise-sensitive land uses by applying feasible noise mitigation measures.	Consistent – The project would include conditions that ensure future development is in compliance with the Noise Compatibility Guidelines.
Historic Preservation Element	
Identification and Preservation of Historical Resources	
<i>Policy HP-A.2.</i> Fully integrate the consideration of historical and cultural resources in the larger land use planning process.	Consistent – The Riverwalk Specific Plan area is the site of former Kumeyaay settlements, which would be reflected in project landscaping and interpretive signage: <i>As mentioned previously, before the arrival of the Spanish, the San Diego River valley was dominated by local tribes who relied upon local plant materials in their daily lives. Since the arrival of the Spanish, the local vegetation of the Riverwalk site has been largely replaced by agriculture, then the golf course. The Riverwalk Specific Plan includes native and historical landscape materials and signage articulating their historical uses and important.</i>

	<p><i>Riverwalk incorporates special features to reflect the project site's prominent location within the prehistory of San Diego. A plant palette that incorporates species traditionally utilized by the Kumeyaay people, which includes mugwort (<i>Artemisia douglasiana</i>), mulefat (<i>Baccharis salicifolia</i>), western ragweed (<i>Ambrosia psilostachya</i>), California deergrass (<i>Muhlenbergia rigens</i>), red willow (<i>Salix laevigata</i>), arroyo willow (<i>Salix lasiolepis</i>), elderberry (<i>Sambucus nigra</i>), and Freemont's cottonwood (<i>Populus fremontii</i>), will be a part of the landscape plan for the Riverwalk River Park. Additionally, interpretive signage will include identification signs along the San Diego River Pathway with plants traditionally utilized by the Kumeyaay people identified by a symbol. A storyboard sign will also be provided that describes the native plants identified along the San Diego River Pathway and their relationship to the Kumeyaay people's ability to thrive in the region.</i></p>
Housing Element	
<p><i>Policy HE-A.5. Ensure efficient use of remaining land available for residential development and redevelopment by requiring that new development meet the density minimums, as well as maximums, of applicable zone and plan designations.</i></p>	<p>Consistent – Riverwalk would develop a variety of housing types in a manner that utilizes a higher-density zone and maximizes efficient development of land.</p>

Table 5.1-2. San Diego River Park Master Plan Analysis

General Recommendations	
3.1.1. Restore and maintain a healthy River system.	Consistent – The project includes habitat restoration and enhancement of the portion of the San Diego River that runs through the project site.
3.1.1.D. Encourage the growth of appropriate native riparian and upland vegetation.	Consistent – The project includes the restoration and enhancement of riparian habitat along the San Diego River.
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 – This EIR analyzes potential impacts of the project hydrology in Section 5.12, <i>Hydrology</i> , and 5.14, <i>Water Quality</i> .
3.1.2.A. Establish appropriate corridors for the River, wildlife, and people.	Consistent – The project design accounts for the San Diego River channel.
3.1.3.A. Create a continuous multi-use San Diego River Pathway from the Pacific Ocean to the City of Santee.	Consistent – The project would construct the San Diego River Pathway within the site to ensure regional connectivity.
3.1.5.D. Include access to the River through new development.	Consistent – The project would provide pedestrian linkages and physical access from the developed

	portions of the site to the San Diego River. No direct physical access for the public to the San Diego River would be provided.
Specific Recommendations	
3.2.2.D. 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 – The project orients development toward the river, enhances and restores a portion of the MHPA area surrounding the river and creates approximately 97 acres of on-site park space
3.2.2.J. Provide interpretive signage along the San Diego River Pathway about the rich history of the Lower Valley.	Consistent – The project would include signage along the San Diego River Pathway and throughout the project site that celebrates the rich history of the Lower Valley Reach.

Table 5.1-3. Mission Valley Community Plan Analysis

Area Specific	
Specific Plan Guidance	
<i>Policy SPG-1.</i> Establish the planning and policy functions in the specific plan for the area governed by the specific plan. Should an amendment be processed to a specific plan that was adopted prior to the adoption of this plan, the amendment should be consistent with the planning and policy functions of this community plan.	Consistent – The Riverwalk Specific Plan includes policy and regulatory functions.
<i>Policy SPG-2.</i> Rescind obsolete specific plans where the property owner(s) deem them no longer relevant. Land uses and policies in this community plan would govern those sites after a rescission.	Consistent – Included within the discretionary actions for the project is the rescission of the Levi-Cushman Specific Plan.
<i>SPG-3.</i> Where appropriate, consider updating the Mission Valley Impact Fee Study for future specific plans, such as where a project-specific traffic analysis identifies community serving infrastructure not previously-anticipated. See: General Plan Policies PF-C.1 through PF-C.7.	Consistent – It was determined that the project would not need to update or amend the IFS. This policy is not applicable to the project.
<i>Policy SPG-4.</i> Coordinate the design of new transportation infrastructure included in specific plans with SANDAG, Caltrans, and MTS.	Consistent – The Riverwalk Specific Plan includes a proposed transit stop that would serve the Green Line Trolley. The Specific Plan is also designed to accommodate future bus service, should MTS bus service become available through the Specific Plan area at a later date.
Freeway Adjacent	
<i>FAD-1.</i> Buffer buildings adjacent to a freeway from the freeway with off-street parking or landscaping.	Consistent – The Riverwalk Specific Plan seeks to optimize development interface along all frontages, including Hotel Circle North facing I-8, to create a fully immersive pedestrian experience around and through the Specific Plan area. As shown in Figure 3-5, <i>Conceptual Landscape Plan</i> , of this EIR, landscaping would be integrated into the South District, including along the southern boundary facing Hotel Circle North and I-8. Additionally, as described in Chapter 3.0 of this EIR, the north side of Hotel Circle North

	would be widened with the project by approximately 10 feet to accommodate a cycle track, parkway, and sidewalk. This space would allow for Hotel Circle North improvements to be implemented per the vision of the Mission Valley Community Plan, which would include a seven-foot landscaped parkway, providing further buffering.
<i>FAD-2. Orient freeway-adjacent buildings such that courtyards and residential units with operable windows and balconies face away from the freeway.</i>	<p>Consistent – The Riverwalk Specific Plan does not include any specific regulations or policies relative to the siting of courtyards or operable windows. As such, the Specific Plan would not preclude future developments from orienting courtyards and residential units with operable windows away from the freeway. The Specific Plan includes a regulation (Reg-194) that addresses potential balconies along the southern boundary of the site, included below.</p> <ul style="list-style-type: none"> • <i>Reg-194. No residential balconies shall front I-8 in areas that exceed an exterior noise level of 70 dBA CNEL.</i>
<i>FAD-3. Locate all residential units above the freeway elevation.</i>	<p>Consistent – The Riverwalk Specific Plan includes a Tailored Development Standard that prohibits residential units on the ground floor of buildings within the South District, which would locate residential units above the freeway elevation.</p>
<i>FAD-4. Incorporate noise attenuation measures on all freeway-adjacent development.</i>	<p>Consistent – Any development within the South District would be required to comply with General Plan noise regulations, as well as Title 24 measures that relate to interior noise attenuation. Additionally, the Riverwalk Specific Plan includes the following noise regulation:</p> <ul style="list-style-type: none"> • <i>Reg-194. No residential balconies shall front I-8 in areas that exceed an exterior noise level of 70 dBA CNEL.</i>
San Diego River	
<i>SDR-1. Follow all Land Use Development Code, Chapter 14, Article 3, Division 1, Special Flood Hazard Areas; Chapter 14, Article 3, Division 1, Environmentally Sensitive Lands; and the San Diego River Park Master Plan requirements on all development within the River Corridor Area and the River Influence Area.</i>	<p>Consistent – The Riverwalk Specific Plan incorporates the San Diego River Park Master Plan in Sections 6.5.16 and 6.5.17. See Section 5.4, <i>Biological Resources</i>, of this EIR for a discussion of ESL. See Section 5.12, <i>Hydrology</i>, of this EIR for a discussion of special flood hazard areas.</p>
<i>SDR-2. Make trail entrances highly visible from the street and surrounding development, with recognizable and unified design elements at trail entrances, including landscaping, pedestrian-oriented amenities (e.g. drinking fountains and benches), signage, and pavers.</i>	<p>Consistent – The Riverwalk Specific Plan includes trails within the Riverwalk River Park, as shown in Figure 3-4. At the time development of the Riverwalk River Park, and adjacent districts, comes online, trail entrances would be demarcated to ensure they are highly visible and contain directional signage.</p>

<ul style="list-style-type: none">• Where trails meet public roads, access points should be directly across from each other and the crossing should be signalized.• Wherever possible, pathways should be uninterrupted by conflicts with vehicles through grade separations.																
<p>SDR-3. Link all recreational areas and plazas, passive or active, visually and/or physically to the River Corridor’s passive recreation areas and facilities, so that they are integrated into the area-wide open space system.</p>	<p>Consistent – Where appropriate, due to the size and topography of the Specific Plan area, parks and open space amenities, to include plazas, would be visually and/or physically linked to the San Diego River. Additionally, the Specific Plan includes a pedestrian circulation exhibit, which shows sidewalk and trail connections, as well as conceptual park plan, which shows the various park and plaza elements proposed by the project. These figures are incorporated into this EIR as Figure 3-3 and Figure 3-4, respectively. The Conceptual Park Systems Plan (Figure 3-3) illustrates the green network throughout the Specific Plan area; the Pedestrian Circulation exhibit (Figure 3-4) illustrates pedestrian facilities, many of which are incorporated into the park plan as formalized connectivity between the various park and plaza elements.</p>															
<p>SDR-4. Step buildings down in height toward the San Diego River, in an effort to provide visual openings and a pedestrian scale of development along the River.</p>	<p>Consistent – Section 6.5.16 of the Riverwalk Specific Plan includes the following regulations relative to building height and massing in relation to the San Diego River:</p> <p><i>Maximum building height and massing on lots adjacent to the River Corridor Area shall be determined by the distance the building is set back from the River Corridor Area, and shall be in compliance with the following table:</i></p> <table><tr><th><i>Minimum Distance the Building is Set Back from the River Corridor Area</i></th><th><i>Maximum Building Height Allowed</i></th><th><i>Massing</i></th></tr><tr><td><i>10 feet</i></td><td><i>35 feet</i></td><td><i>No more than 50 percent of a building’s wall may be located at the setback measured from the River Corridor Area.</i></td></tr><tr><td><i>20 feet</i></td><td><i>45 feet</i></td><td><i>No regulation.</i></td></tr><tr><td><i>30 feet</i></td><td><i>85 feet</i></td><td><i>At or above 100 feet in height above finished grade, a</i></td></tr><tr><td><i>85 feet</i></td><td><i>The maximum building height allowed is equal to</i></td><td></td></tr></table>	<i>Minimum Distance the Building is Set Back from the River Corridor Area</i>	<i>Maximum Building Height Allowed</i>	<i>Massing</i>	<i>10 feet</i>	<i>35 feet</i>	<i>No more than 50 percent of a building’s wall may be located at the setback measured from the River Corridor Area.</i>	<i>20 feet</i>	<i>45 feet</i>	<i>No regulation.</i>	<i>30 feet</i>	<i>85 feet</i>	<i>At or above 100 feet in height above finished grade, a</i>	<i>85 feet</i>	<i>The maximum building height allowed is equal to</i>	
<i>Minimum Distance the Building is Set Back from the River Corridor Area</i>	<i>Maximum Building Height Allowed</i>	<i>Massing</i>														
<i>10 feet</i>	<i>35 feet</i>	<i>No more than 50 percent of a building’s wall may be located at the setback measured from the River Corridor Area.</i>														
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<i>30 feet</i>	<i>85 feet</i>	<i>At or above 100 feet in height above finished grade, a</i>														
<i>85 feet</i>	<i>The maximum building height allowed is equal to</i>															

		<i>the number of feet the building is set back from the River Corridor Area.</i>	<i>building's wall shall be at least 30 percent narrower than the width of the building wall on the ground floor.</i>
	115 feet	<i>The maximum building height allowed is established by the base zone.</i>	
SDR-5. Implement permanent best management practices, listed in the City's Storm Water Standards Manual, on all river area development. Incorporate both mandatory structural practices (swales, infiltration basin) and mandatory non-structural practices (restricted irrigation, aggressive street cleaning).			
Consistent – BMPs would be implemented as required by the City's Storm Water Standards Manual.			
Transit Adjacent			
TAD-1. Design building entrances and pedestrian paths to provide convenient access to the trolley, and, where possible, direct views of the trolley station.		Consistent – Land uses surrounding the transit stop are envisioned to include activated ground floors with entrances onto the trolley plaza and pedestrian connectivity to the transit stop, as delineated in Section 6.3.7, <i>Mixed-Use Core/Retail/ Transit Stop</i> , of the Riverwalk Specific Plan. Retail activation interface regulations, as illustrated in Figure 6-2, <i>Ground Level Activation</i> , of the Specific Plan and Figure 5.3-1, <i>Riverwalk Specific Plan Retail Activation Interface</i> , of this EIR, and discussed in subsection <i>Retail Activation Interface</i> , of Section 6.4.6, <i>Activated Interfaces</i> , of the Specific Plan also apply to the transit stop area.	
TAD-2. Make active uses, such as retail, café, and restaurants, visible and/or easily accessible to transit users embarking or disembarking the trolley stations.			
TAD-3. Incorporate pedestrian-oriented amenities on development within transit areas, such as enhanced streetscape design; parks; pocket parks; public plazas; large-canopy street trees; seating and shade structures; and water features, which shorten the perceived walking distances within transit areas.		Consistent – The transit stop would include a public plaza with landscaping, seating, and the provision of shade (for example, from canopy trees and/or shade structures). Additionally, subsection <i>Retail Activation Interface</i> of Section 6.5.6, <i>Activated Interfaces</i> , of the Riverwalk Specific Plan, includes the following pedestrian-oriented regulations, which would apply to the transit stop and surrounding plaza: <ul style="list-style-type: none">• <i>Pedestrian access to retail parking garages and stairs shall be provided along this interface in an architecturally cohesive manner.</i>• <i>Along the interface, enhanced pedestrian experience shall be accomplished through enhanced paving, storefront canopies or outdoor seating in areas near building entrances, cafés, and restaurants.</i>• <i>Wider sidewalks onto private property are encouraged to accommodate sidewalk cafés.</i>	
TAD-4. Facilitate connectivity to transit stations through placement and orientation of pedestrian paths on site plans within transit areas.		Consistent – The Riverwalk pedestrian and bicycle network would connect to the proposed transit stop, as shown in this EIR in Figure 3-4 and Figure 3-6, respectively.	

Composition	
Blocks and Lots	
<i>BLK-1.</i> Create a robust secondary street network in Mission Valley as development is completed. Incorporate new vehicular rights-of-way into plans for large sites such that block sizes do not exceed 500 feet in length.	Consistent – The street network proposed for Riverwalk (shown in Figure 3-8 of this EIR) would create a secondary street network complete with pedestrian and bicycle facilities, as well as vehicle travel lanes.
<i>BLK-2.</i> Design new blocks to be walkable. Maximum block size should be no greater than 300 feet by 600 feet. Encourage any block larger than 300 feet by 600 feet to have a publicly accessible pedestrian connection (paseo) that bisects the block to reduce travel distance for pedestrians.	Consistent – Riverwalk would develop with a walkable grid-pattern of streets that would include pedestrian facilities and amenities. Paseos are recommended in the Riverwalk Specific Plan in Section 3.2.2, <i>Urban Parks</i> , subsection <i>Paseos</i> . Site topography would ultimately be gently sloping toward the San Diego River and would result in generally level building pad areas, which would further promote walkability.
<i>BLK-3.</i> Lay out new streets in a connective pattern unless topography, environmental conditions, or the like make it infeasible.	
<i>BLK-4.</i> Connect new streets and mid-block pedestrian connections to the surrounding circulation network.	Consistent – The Riverwalk street system (shown in Figure 3-8 of this EIR) would connect to the existing roadway network at numerous locations along Friars Road, Fashion Valley Road, and Hotel Circle North.
<i>BLK-5.</i> Provide a pedestrian public access easement (paseo) through development that is greater than four acres. These easements should provide links between public roads, high activity centers, recreational areas, and transit corridors.	Consistent – The project does not include any developable (numbered) lots greater than four acres. The largest developable lot is 2.667 acres (Lot 31). Therefore, this policy does not apply.
Streetscapes	
<i>STS-1.</i> Provide clear access to and visibility of the adjacent use in areas between pedestrian pathways and buildings. Enhance entrances and fenestration architecturally, with articulation, detailing, stoops/stairs, canopies, arcades, and/or signage.	Consistent – Section 6.4.6, <i>Activated Interfaces</i> , of the Riverwalk Specific Plan provides guidance for ground floor design features, such as entrances, detailing, and signage.
<i>STS-2.</i> Maintain the minimum following dimensions for the unobstructed path of travel for pedestrians (sidewalk) in/through building entry areas: <ul style="list-style-type: none"> • Six feet along local streets; • Eight feet along major/collector streets or abutting high intensity residential development along local streets; and • Ten feet abutting high intensity commercial development. 	Consistent – Sidewalks within the project would range from five to 14 feet, with a general width of six to seven feet (as shown in Figure 4-11 through 4-36 of the Riverwalk Specific Plan). Sidewalks have been designed to create walkable streets and interesting streetscapes. Although the project does not meet the specific dimensions of this policy, policies and regulations of the Specific Plan do meet the intent of this guidance.
Building Form and Design	
<i>BFD-1.</i> Step back upper levels of buildings in areas where building heights vary to transition to adjacent lower building heights. Incorporate architectural elements into building design that smooth the transition between the new and existing architecture.	Consistent – Section 6.6 of the Riverwalk Specific Plan provides special regulations for stepbacks adjacent to existing development.
<i>BFD-2.</i> Articulate building mass and surfaces with three-dimensional elements that reduce apparent bulk and create visual interest. Building design should include features such as balconies, recesses,	Consistent – Chapter 6 of the Riverwalk Specific Plan contains policies and regulations relative to massing and design. See Section 5.3, <i>Visual Effects and Neighborhood Character</i> , for additional discussion.

projections, varied finishes, transparency, signage, reveals, brackets, cornices at the roof and at the top of the ground floor, and piers at corners and structural bays.	
BFD-3. Utilize corner lots to highlight architecture features with changes in massing and building height and/or create defined building entrances or small plazas by increasing ground floor setbacks.	Consistent – Policies and regulations within Chapter 6 of the Riverwalk Specific Plan address building articulation, massing, height, and entrances. Specific Plan Section 6.4, <i>Architectural Foundation</i> , includes policies and regulations for building articulation in Section 6.4.4, <i>Architectural Use</i> , Section 6.4.5, <i>Building Style and Massing Guidelines</i> , and Section 6.4.6, <i>Activated Interfaces</i> ; building entrances, orientation, and siting within Section 6.3.6, <i>Building to Street Relationship</i> , Section 6.4.1, <i>Site Planning</i> , and Section 6.4.6, <i>Activated Interfaces</i> ; and policies for massing and building heights within Section 6.4.3, <i>Form and Scale</i> , and Section 6.4.5, <i>Building Style and Massing Guidelines</i> . Building articulation is further addressed specific to each district in Section 6.6, <i>District Specific Guidelines</i> .
BFD-4. Limit blank walls to 20 horizontal linear feet within Mission Valley; 30 feet when enhanced by a mural or other permanent public art.	Consistent – The Riverwalk Specific Plan includes the following guidance to avoid large expanses of blank walls: <i>Longer expanses of walls should provide visual relief with design techniques such as a periodically recessed wall plane, vertical pilasters, or jogs in a fence line. In addition, landscaping, such as trees, shrubs, or vines, should be used to soften the appearance of the wall or fence, where appropriate, especially along long expanses of walls and/or fencing.</i>
BFD-5. Place, proportion, and design windows to contribute to a coherent and appealing composition, add architectural interest, and differentiate the various components and uses of the building (e.g., ground floor retail spaces, lobbies, office suites, or residential units).	Consistent – The Specific Plan and its associate design guidelines and development standards would ensure that architectural interest, coherent and appealing composition, and differentiation of components is achieved across developments. Windows are specifically addressed the regulations included in Riverwalk Specific Plan Section 6.4.6, <i>Activated Interfaces</i> , and Section 6.5.16, <i>River Influence Area</i> , as well as district-specific policies and regulations within Section 6.6, <i>District Specific Guidelines</i> .
BFD-6. Include acoustically rated windows and doors featuring higher Sound Transmission Class ratings to reduce exterior noise in structures with noise sensitive land uses. Retrofit existing structures with the same treatments.	Consistent – Windows of future developments would be consistent with sound rating requirements the time development comes forward, taking into account ambient in noise in the surroundings and interior uses.
BFD-7. Satisfy at least ONE of the following conditions on any flat roof element (defined as having a slope less than 10 percent) on all new structures or enlargements:	Consistent – Roof treatments within the Riverwalk Specific Plan may include roofline variations, residential terraces and other amenity uses, parking areas, and/or solar arrays. Roof design would take

<ul style="list-style-type: none"> ○ The flat roof element is designed as an architectural/landscape amenity to enhance the views from the proposed structure or adjacent structures. Such enhancement may consider roof gardens, architectural features, special pavings and patterns, or other comparable treatment. ○ Up to 40 percent of a building's coverage can be a single flat roof element, with separate elements differentiated by a minimum 5 foot change in elevation. ○ A minimum of 40 percent of the flat roof element is designed structurally and architecturally to accommodate outdoor activities. ○ A minimum of 40 percent of the flat roof element contains solar panels. ○ The flat roof is over a parking structure that complies with Land Development Code Chapter 14, Article 2, Division 5. 	<p>into account the LDC regulations in place at the time individual developments come forward. Additional policies of the Specific Plan relative to rooflines include:</p> <ul style="list-style-type: none"> • <i>Policy-3. Design and development of buildings should complement the landscape through features such as terraces and roofscapes.</i> • <i>Policy-11. Special attention shall be paid to roof area treatment and materials in all buildings.</i> • <i>Policy-18. Residential buildings should make use of balconies, decks, roof terraces, or other features that provide texture and depth of building façades and allow views of open spaces. Flat roofs may be designed for human use as terraces, gathering decks, and gardens.</i>
<p>BFD-8. Identify the pedestrian and bicycle routes to and from Trolley stations and the San Diego River with wayfinding signage. Place signs and other public facilities in a manner that provides a clear, unobstructed pedestrian path and continuous parkway design. Signage should be submitted for review for compliance with one of the following:</p> <ul style="list-style-type: none"> ○ One vertical way-finding sign should be provided per 100 feet of street-facing building façade. Examples of vertical wayfinding signage include permanent banners, traditional sign posts, plaques, or vertical wayfinding signage in the pedestrian zone; or ○ One horizontal way-finding sign should be provided per 100 feet of street facing building façade. Examples of horizontal way-finding include specialized paving patterns or inset arrows along adjacent public rights-of-way, private streets, or private drives. 	<p>Consistent – Pedestrian and bicycle routes within the Specific Plan area (see Figure 3-4 and Figure 3-6 of this EIR, respectively) would provide connection to the proposed trolley stop. Signage would be provided, as appropriate, to ensure wayfinding to the trolley stop is clear.</p>
<p>Building Placement and Orientation</p> <p><i>BPO-1.</i> Begin site design by locating the point on the site providing the best access to high-quality transit. Radiate the site design from that point, where all buildings have the most direct pedestrian access possible to that point.</p> <p><i>BPO-2.</i> Articulate building mass and surfaces with three-dimensional elements that reduce apparent bulk and create visual interest. Building design should include features such as balconies, recesses, projections, varied finishes, transparency, signage, reveals, brackets, cornices at the roof and at the top</p>	
<p>Consistent – The Specific Plan includes extensive policies and regulations relative to building placement and orientation in Chapter 6. Specifically, Section 6.4.6 of the Riverwalk Specific Plan addresses ground floor articulation, to include lobbies and entrances; features such as canopies, first floor patios; residential amenities on the ground floor; pedestrian activation; and building orientation.</p>	

of the ground floor, and piers at corners and structural bays.	
<i>BPO-3.</i> Face entrances to buildings to the street providing primary access, and establish a direct pedestrian connection between the sidewalk and the primary entry.	
<i>BPO-4.</i> Proportion doorways, windows, and other openings to reflect pedestrian scale and movement and to encourage interest at the street level.	
<i>BPO-5.</i> Activate ground floor uses and, where possible, make transparent to engage pedestrians and create a livelier environment. Ground floor activation, such as storefronts, dining areas, lobbies, and offices should occur on all streets designated as "Potential Main Street" in the Urban Design section of this plan.	
<i>BPO-6.</i> Orient buildings, whenever possible, to create a community gathering place such as an outdoor cafe area, community garden, park, plaza, or public art installation.	
<i>BPO-7.</i> Design site plans to encourage interaction among occupants and passersby. Buildings and entrances should be located and configured to define the edges of open spaces and provide visibility and accessibility of open spaces from public rights-of-way and pedestrian pathways.	
<i>BPO-8.</i> Conceal all mechanical, electrical, and other building equipment from the public right-of-way and from other existing buildings. Minimize noise and visual impacts with screening materials, landscaping and other buffers. Locate mechanical equipment away from ground floor primary frontage.	Consistent – Section 6.5.4, <i>Mechanical Equipment and Screening</i> , addresses concealing or screening mechanical equipment from public views.
Parking	
<i>PRK-1.</i> Encourage shared parking agreements and use of technology to optimize the efficiency of existing and future parking supplies and reduce the burden on future development.	<p>Consistent – Shared parking is encouraged in the Specific Plan. The following policy specifically addresses shared parking:</p> <ul style="list-style-type: none"> • <i>Policy-34. Shared parking based on land use demands at different times of day should be used where applicable.</i> <p>Shared parking is also addressed in Riverwalk Specific Plan Section 4.7, <i>Vehicular Access and Parking</i>.</p>
<i>PRK-2.</i> Consider unbundled parking to offset development costs and encourage use of alternative transportation modes on development.	Consistent – Per the project's TDM, parking would be unbundled.
<i>PRK-3.</i> Consider applying the Parking Standards for Transit Priority Areas (TPA) on development.	Consistent – Future developments within Riverwalk would be able to take advantage of TPA parking standards.

<p><i>PRK-4.</i> Consider designating priority parking spaces for electric vehicles and zero emissions vehicles on development.</p>	<p>Consistent – The Riverwalk Specific Plan includes the following regulation and policy relative to environmentally-superior vehicle options:</p> <ul style="list-style-type: none"> • <i>Policy-89. Promote the use of fuel efficient vehicles through such provisions as electric vehicle charging areas and designated parking for low-fuel/energy efficient vehicles, as well as carpool/vanpool parking.</i> • <i>Reg-131. Provide electric vehicle-ready parking as required by code.</i> <p>Actual location of parking, including priority parking considerations, would be determined at the time individual developments come online.</p>
<p><i>PRK-5.</i> Locate parking areas to the side or rear of buildings, away from the public right-of-way and outside of primary frontages.</p>	<p>Consistent – The Specific Plan includes policies and regulations that require parking to be integrated into site and structure design. Because of street activation policies and regulations (see Specific Plan Section 6.3.6, <i>Building to Street Relationship</i>, Section 6.4.6, <i>Activated Interfaces</i>, and Section 6.6, <i>District Specific Guidelines</i>), parking areas would not be anticipated to occur adjacent to primary frontages.</p>
<p><i>PRK-6.</i> Distribute parking areas throughout a development site to avoid large contiguous parking areas and to integrate landscaping. Each parking area should include no more than 30 percent of the development's parking spaces.</p>	<p>Consistent – Parking would be distributed throughout the Specific Plan area, with emphasis placed on consolidated and shared parking, as addressed in Section 6.5.3, <i>Parking</i>, of the Riverwalk Specific Plan. Parking is envisioned to be accommodated primarily in structures and/or shared facilities, where possible.</p>
<p><i>PRK-7.</i> Make pedestrian access to parking areas fully accessible, visible, and free of obstructions to ensure safety and minimize conflicts between pedestrians, bicycles, and vehicles.</p> <ul style="list-style-type: none"> • Connect parking areas with adjoining streets and with all primary buildings on site. • Construct walkways at the shortest practical distance between the building entry and the sidewalk. • Differentiate where a walkway crosses a parking area, aisle, or driveway with paving materials, a change in elevation, and/or speed humps. 	<p>Consistent – As part of pedestrian wayfinding, pedestrian access to parking areas would be delineated when such development comes online.</p> <p>The Riverwalk Specific Plan includes the following policy relative to pedestrian access to parking areas:</p> <ul style="list-style-type: none"> • <i>Policy-61. Safe and convenient pedestrian movement should be provided within, to, and from parking areas, as well as to surrounding existing commercial, residential, and office developments and the valley-wide pedestrian and public transit systems.</i> • <i>Policy-75. Driveway entrances to parking areas should minimize disturbances to the pedestrian continuity of the sidewalk areas.</i>
<p><i>PRK-8.</i> Encourage a minimum of 10 percent landscaping of the parking lot area.</p>	<p>Consistent – The Specific Plan includes parking area landscaping policies and regulations (subsection <i>Parking Lot Landscaping</i> of Riverwalk Specific Plan Section 6.5.11, <i>Landscape Features</i>) to ensure adequate landscaping within parking lots and other parking areas.</p>

<p><i>PRK-9.</i> Locate loading and service areas off the public right-of-way and screen with masonry walls, landscaping, or architectural elements. Design loading/service areas to avoid creating concealed hiding places.</p>	<p>Consistent – Screening of loading areas would be consistent with LDC Chapter 14, Article 2, Division 10. Additionally, the Specific Plan includes the following overall regulation for loading area screening:</p> <p><i>Where loading docks and overhead doors are proposed, the loading docks and overhead doors shall be screened from the public right-of-way with fences or walls designed to reduce visual impacts.</i></p> <p>Specific to screening of loading areas within the River Influence Area (Section 6.5.16 of the Riverwalk Specific Plan), the following regulations apply:</p> <p><i>Shall be screened with landscape and an opaque wall at least six feet in height or, if the item to be screened exceeds six feet in height, a wall one foot taller than the item, to a maximum wall height of 10 feet. Screening shall be of the same design and materials as the primary building façade.</i></p>
<p><i>PRK-10.</i> Locate bicycle parking near building entrances and exits, and ensure it is secured, weather protected, and illuminated with adequate lighting.</p>	<p>Consistent – Future development would determine the appropriate location for bicycle parking taking into account considerations to proximity to the building entrance, safety and security, and ease of access from the bicycle network. Bicycle parking is specifically addressed in Riverwalk Specific Plan Section 6.5.3, <i>Parking</i>; the <i>Bicycle Facilities/Bike Racks/Parking</i> subsection of Section 6.5.12, <i>Transportation Features</i>; and the <i>Active Transportation</i> subsection of Section 6.5.13, <i>Sustainable Features</i>.</p>
<p><i>PRK-11.</i> Design structured parking as an integral part of the development it serves, consistent in style and materials with the rest of the development.</p>	<p>Consistent – The Specific Plan requires parking structures to be integrated into project design and includes the following policies:</p> <ul style="list-style-type: none"> • <i>Policy-17. When parking garages are provided, they should be integrated into each new development and should occur under or adjacent to each structure or related group of structures, providing for the most efficient use of space and direct access for the user. Ground-level parking spaces should be utilized for retail activity whenever feasible, but should be minimized to avoid expansive open parking areas.</i> • <i>Policy-30. Structured parking is encouraged to make efficient use of the land area and to avoid expansive areas of open parking lots.</i> • <i>Policy-31. Parking structures should be architecturally integrated with development to reduce the visual prominence devoted to parking.</i> • <i>Policy-56. Evergreen trees and shrubs may be combined with earthen berms to screen surface</i>

	<i>parking and parking structures from adjacent view corridors, development, streets, and river views.</i>
PRK-12. Design partially below-grade parking structures to be a maximum of four feet above the adjacent sidewalk grade, and screen the exposed portion with landscaping and/or design elements that are architecturally consistent in design with and that complement the rest of the building.	Consistent – Any partially below-grade parking would be designed consistent with LDC regulations and would be integrated into project design.
PRK-13. Provide garage or tuck-under parking access from side streets or rear alleys.	Consistent – Parking structure access would occur on secondary streets, where possible. The Riverwalk Specific Plan includes the following policy relative to parking access siting: <ul style="list-style-type: none"> • <i>Policy-39. Large parking areas shall be located off internal project streets rather than the abutting major streets. This simplifies ingress and egress and provides drive up and drop off access.</i>
Land Use	
Commercial Development	
COM-1. Design commercial development with a “Main Street” feel, providing building doors and access to open space areas directly from the street, or primary pedestrian path if adequate street frontage is unavailable.	Consistent – It is envisioned the spine road of Riverwalk would impart the feeling of a main street, with commensurate treatment for commercial uses along it. In addition to the retail, street, and park activation regulations that would occur along the spine road as described in Section 6.4.6, <i>Activated Interfaces</i> , of the Riverwalk Specific Plan, the following regulation applies to the spine road: <ul style="list-style-type: none"> • <i>Reg-167. The spine road that runs down the center of the North District and creates a pedestrian promenade shall include street trees, street furniture, and landscaping that foster pedestrian activity over the use of vehicles.</i>
COM-2. Distinguish and accentuate the ground floor of buildings through facade articulation and transparency of building function/program.	Consistent – The Specific Plan includes extensive policies and regulations relative to building placement and orientation in Chapter 6. Specifically, Section 6.4.6 of the Riverwalk Specific Plan addresses ground floor articulation, to include lobbies and entrances; features such as canopies, first floor patios, transparency and windows, etc.; residential amenities on the ground floor; pedestrian activation; and building orientation.
COM-3. Design street-facing storefronts to create an active and inviting pedestrian realm. <ul style="list-style-type: none"> ○ In one retail structure with several stores, define individual storefronts by providing variations in facades, such as shallow recesses at entries, piers, or other architectural elements, to create the appearance of several smaller buildings or shops, rather than a single, large, and monotonous building. ○ Complete storefront facades should include doors, large display windows, bulkheads, signage areas, and awnings. 	
COM-4. Design building entries so that they are clearly defined and distinguishable from the street and pedestrian paths. Building entries should include at	

least one of the following design features: entry plaza, vertical articulation, or architectural elements such as a recessed entry, awnings canopy, or portico.	
COM-5. Locate the primary entrances for both first-floor establishments and upper level units within the primary façade and make them visible and accessible from the street.	
COM-6. Site nearly all parking serving commercial development behind any buildings facing the primary street. Large parking fields in front of buildings are not permitted.	<p>Consistent – The Riverwalk Specific Plan includes policies that require parking to be integrated into site and structure design. Because of street activation policies, parking areas would not be anticipated to occur adjacent to primary frontages. The following policies address parking:</p> <ul style="list-style-type: none"> • <i>Policy-17. When parking garages are provided, they should be integrated into each new development and should occur under or adjacent to each structure or related group of structures, providing for the most efficient use of space and direct access for the user. Ground-level parking spaces should be utilized for retail activity whenever feasible, but should be minimized to avoid expansive open parking areas.</i> • <i>Policy-30. Structured parking is encouraged to make efficient use of the land area and to avoid expansive areas of open parking lots.</i> • <i>Policy-31. Parking structures should be architecturally integrated with development to reduce the visual prominence devoted to parking.</i> • <i>Policy-33. Development of Riverwalk provides off-street parking facilities that are attractively designed and integrated into development. The parking pattern will be created through the joint use and physical interconnection of parking areas and garages, when feasible.</i> • <i>Policy-39. Large parking areas shall be located off internal project streets rather than the abutting major streets. This simplifies ingress and egress and provides drive up and drop off access.</i>
COM-7. Provide for the privacy and noise attenuation of adjacent homes on any commercial development sited adjacent to residential development.	<p>Consistent – The Riverwalk Specific Plan contains the following policy to address noise from commercial uses, particularly loading areas:</p> <ul style="list-style-type: none"> • <i>Policy-41. When a building contains a loading dock, the building should be designed to minimize residential exposure to the nuisances associated with the loading dock to the maximum extent possible.</i>
COM-8. Design office development to accommodate changes in workforce styles and needs. Office uses should be developed within high-quality office districts where workers have access to restaurants, services, and outdoor recreation.	<p>Consistent – Riverwalk would accommodate a variety of office and employment models. The South District, envisioned to be the employment hub of the neighborhood, is envisioned to be enhanced with commercial services and would be located adjacent to</p>

	<p>the recreational amenity of the Riverwalk River Park. The Riverwalk Specific Plan includes the following discussion of design considerations for the South District:</p> <p><i>The South District anticipates to develop as the employment hub of Riverwalk. This District also interfaces with the Riverwalk River Park, which is a mix of active park areas and passive open space areas, as well as the San Diego River Park Master Plan area. The active use areas and park-fronting buildings should be oriented toward and encourage engagement with the San Diego River and are intended to serve as a draw for the broader community. Retail uses and spaces should be provided to serve employees of the office buildings, as well as visitors to the Riverwalk River Park. Retail uses oriented toward plazas, paths, and view corridors are strongly encouraged.</i></p>
COM-9. Prohibit drive-throughs within strictly commercial sites; they can be designed as an integrated part of a mixed use development.	Consistent – The Riverwalk Specific Plan would develop as an integrated mixed-use project. As such, solely commercial sites are not anticipated. If drive-throughs are provided, they would be integrated into the greater mixed-use project.
COM-10. Design car dealerships to be contained within buildings in an urban format, with limited parking fields and car storage through the use of structured parking.	Consistent – The Riverwalk Specific Plan does not contemplate car dealerships as part of the build-out of the mixed-use project. However, all development within Riverwalk would be required to adhere to the regulations and policies of the Specific Plan. Parking for any development within the Specific Plan area would be required to adhere to the parking policies and regulations of the Specific Plan, regardless of land use.
COM-11. Provide goods and services needed for local residents and employees at retail establishments unless placed on a site designated for Regional Retail services.	Consistent – Commercial uses within Riverwalk would be at a neighborhood scale consistent with the CC-3-9 zone. The project does not anticipate regional retail services within the Specific Plan area.
COM-12. Design all commercial development to be accessible by all modes of travel. Connect all primary entrance doors to a primary pedestrian path with limited conflict points with automobiles.	Consistent – Like all uses within Riverwalk, commercial uses within the project would be accessible via the pedestrian and bicycle network, as well as the vehicular network.
Mixed-Use Development	
MXU-1. Demonstrate consistency with the policies identified for residential or commercial development needs on mixed use developments.	Consistent - The Specific Plan embraces the mixed-use concepts articulated by the City through the vertical and horizontal mixing of residential and commercial uses throughout the Specific Plan area.
MXU-2. Strive to facilitate no net loss of jobs on a mixed use development that is proposed on a previously all commercial site, while increasing opportunities for housing. Encourage units that integrate job opportunities such as live/work, shopkeeper, and home occupation.	Consistent - The Riverwalk Golf Course employs approximately 70 to 90 individuals, depending on the time of year. The Specific Plan includes 1,152,000 square feet of employment uses (152,000 square feet of commercial retail and 1,000,000 square feet of office and non-retail commercial). Employment

	<p>provided by the Specific Plan would generate greater than 70 to 90 jobs, resulting in no net loss of jobs.</p> <p>The Specific Plan provides for 4,300 multi-family residential units, where none currently exist, thereby increasing opportunities for housing. Live/work quarters are allowed in areas zoned CC-3-9 as a limited use; shopkeeper and home occupation uses are allowed throughout the Specific Plan area. As such, the zones proposed for the project allow for units that integrate job opportunities, such as live/work, shopkeeper, and home occupation.</p>
MXU-3. Design mixed use development in either a horizontal or vertical format as long as all uses are functionally integrated with unobstructed pedestrian paths with limited automobile conflict points between all uses.	Consistent – The Specific Plan encourages mixed-use development in both vertical and horizontal formats.
MXU-4. Prioritize employment uses in mixed use sites adjacent to transit stops and stations to promote transit ridership.	Consistent – The Specific Plan encourages employment use within the central core of the neighborhood, adjacent or near to the proposed transit stop, and within the South District, adjacent to the Fashion Valley Transit Center.
MXU-5. Locate commercial uses such that they are not disruptive to residential uses.	<p>Consistent – The Riverwalk Specific Plan contains the following policy to address noise from commercial uses, particularly loading areas:</p> <ul style="list-style-type: none"> • <i>Policy-41. When a building contains a loading dock, the building should be designed to minimize residential exposure to the nuisances associated with the loading dock to the maximum extent possible.</i>
MXU-6. Locate the primary entrances for both first-floor establishments and upper level office or residential units in mixed-use buildings within the primary façade and make them visible and accessible from the street.	Consistent – The Riverwalk Specific Plan includes extensive policies and regulations relative to building placement and orientation in Chapter 6. Specifically, Section 6.4.6 of the Specific Plan addresses ground floor articulation, to include lobbies and entrances; features such as canopies, first floor patios, transparency and windows, etc.; residential amenities on the ground floor; pedestrian activation; and building orientation.
MXU-7. Use a high degree of transparency on primary, ground floor, non-residential frontages of a building. However, if a residential use is included, it should be activated through stoops to engage pedestrians and create a livelier street environment. On secondary frontages, activation is not required but buildings should be well-articulated to create visual interest for pedestrians.	
MXU-9. Design mixed use development to provide for the needs of children through amenities and open areas. Consider the siting of childcare facilities to meet on site commercial requirements.	Consistent – Amenities and open areas within Riverwalk would provide for the needs of children. Programming within Riverwalk River Park may include educational signage/kiosks, children's play areas, and ball fields (Riverwalk Specific Plan Section 3.2.1, <i>Riverwalk River Park</i>). Additionally, child-friendly development within the River Corridor Area can include children's play areas, multi-purpose courts,

	turf fields, and ball fields (Specific Plan Section 6.5.16, <i>River Corridor Area</i>) Programming in private open space may include children's play areas (Specific Plan Section 3.2.3, <i>Private Open Space</i>). Additionally, child care facilities are permitted as a limited use within the CC-3-9 and RM-4-10 zones, which would allow for child care facilities to be developed as part of commercial components of the project.
Residential Development	
RES-1. Encourage the development of a variety of building formats to provide functional and visual diversity of housing options throughout the community.	Consistent – Section 6.3, <i>General Design Themes</i> and Section 6.4, <i>Architectural Foundation</i> , of the Riverwalk Specific Plan encourages variety in building types and design, with massing element and high-quality materials acting as unifying features.
RES-2. Use development to achieve a diverse mix of unit sizes and types, such as three-bedroom, shopkeeper, home occupations, residential-work units, and micro-units, to accommodate many lifestyles and family sizes.	Consistent – Unit types and sizes within Riverwalk would be responsive to the housing needs of the community at the time individual projects come forward.
RES-3. Provide housing options that can be comfortably occupied by seniors, including units without internal staircases and limited stairs on external paths.	Consistent – Building design, external access points, and sidewalks would be in compliance with ADA regulations.
RES-4. Encourage affordable housing to be built on site.	Consistent – Riverwalk would meet its inclusionary housing requirement and provide 10 percent inclusionary affordable units on-site (see Section 7.2, <i>Affordable Housing</i> , of the Riverwalk Specific Plan).
RES-5. Design any residential development built within 500 feet of a freeway to minimize the exposure of freeway noise, including siting buildings and balconies perpendicular to the freeway, and using parking structures to shield units from noise.	Consistent – Existing noise levels do not exceed 75 dBA. Any future residential use above the 70 dBA CNEL must include noise attenuation measures to ensure an interior noise level of 45 dBA CNEL and be located in an area where a community plan allows multiple unit and mixed-use residential uses, as required by the General Plan. For any residential development located in the South District fronting I-8, residential balconies would be prohibited where exterior noise exceeds 70 dBA.
RES-6. Face primary entrances for residential units (individual or shared) towards either a public street or a main street that is internal to the development if adequate public frontage does not exist. Entrances should provide a connection to the main vehicular street through stoops, a path-way, porches, or other transitional features.	Consistent – All of Riverwalk's residential blocks include a street activation interface, retail activation interface, and/or park activation interface. These interfaces, described in Section 6.4.6, <i>Activated Interfaces</i> , of the Riverwalk Specific Plan, include requirements to address the public street, with entrances and other features along the public street frontage.
RES-7. Make security gating or fencing a minimum of 50 percent transparent to provide views into the courtyard. Any gating and/or fencing may be used to demarcate private areas, but public pedestrian connectivity needs to be maintained with pass-throughs to prevent the creation of mega-blocks.	Consistent – Section 6.5.9, <i>Fences and Walls</i> , of the Riverwalk Specific Plan includes the regulations for fences and walls, including materials and treatments. Additionally, gates and/or fencing that restrict access along public rights-of-way are prohibited.

<i>RES-8.</i> Design open spaces to enhance the quality of life for residents. Areas may be small, but should be adequately sized to allow movement and usability. Such areas may include balconies, decks, and patios. For larger units, the areas should be designed with consideration for the needs of families with children.	Consistent – Section 6.5.6, <i>Private Open Space</i> , of the Riverwalk Specific Plan includes regulations and policies relative to private open space, including patios and balconies. Regulations and policies address materials, dimensions, placement, and recreational uses.
Mobility	
Bicycling	
<i>BIC-1.</i> Provide a sheltered Bike Kitchen—a place to use tools and repair bicycles—within development required to build 10 long-term bicycle parking spaces.	<p>Consistent – The Specific Plan encourages support amenities, such as bicycle repair stations. Actual location of these stations would be determined as individual developments are brought online to ensure centrality of use and avoid redundancy.</p> <p>Specifically, support amenities are illustrated in Riverwalk Specific Plan Figure 3-6, and addressed by the following Mobility Design Objective:</p> <p><i>Create a fully-focused active transportation network with dedicated bicycle and pedestrian facilities; supportive elements, such as bike rental and repair stations; and street elements that support active use, such as a grid pattern and complete streets elements of dedicated facilities, ample landscaping, and integration of users.</i></p>
<i>BIC-2.</i> Ensure bicycle parking is provided in a visible, well-lit area.	Consistent – Bicycle parking would be included within overall lighting policies and regulations that promote safety and security of users. See Section 6.5.10, <i>Outdoor Lighting</i> , of the Riverwalk Specific Plan.
<i>BIC-3.</i> Identify ingress and egress for bicycles, with minimum interaction with vehicles on access plans for development.	Consistent – The Specific Plan includes an access map (Figure 4-43 of the Specific Plan), which identifies all access points to the Specific Plan area, including active transportation only access points.
<i>BIC-4.</i> Connect development to bicycle trails and routes per the San Diego Regional Bicycle Plan. Locate open spaces to abut or provide direct access to bicycle facilities.	Consistent – The Riverwalk bicycle network was designed in consideration of the existing and planned regional bicycle network (see Figure 5.1-3, <i>Regional Bicycle Network Connectivity</i>).
Streets	
<i>STR-1.</i> Provide a well-connected grid of internal streets and ample provisions for pedestrian and bicycle mobility on development.	Consistent – Riverwalk's proposed circulation network includes a general grid pattern of streets (see Figure 3-8 of this EIR) that would be well-connected (both internally and to off-site circulation elements) and would include provisions for bicycle and pedestrian mobility.
<i>STR-2.</i> Support the buildout of the planned roadway network and associated classifications depicted in Table 3 of the Mission Valley Community Plan and Figure 14 of the Mission Valley Community Plan on development, which may include the allocation of right-of-way to support a complete multimodal	Consistent – Riverwalk's roadway network was planned to take into consideration the Mission Valley Community Plan roadway network and would either implement roadways or would allow for the future implementation of community-serving roadways (through IODs).

network; this includes critical connections and some strategic widenings.	
STR-3. Research planned capital projects that may require the allocation of space and/or identify measures to avoid impeding implementation of planned projects on development.	Consistent - This research was done with the Community Plan Update process, relative to future public Street J and future public Street U. See response to STR-5, below.
STR-4. Include all pedestrian amenities required of public streets, consistent with the City of San Diego Street Design Manual, on any development that includes private drives that provide ingress and egress to a site.	Consistent - The Riverwalk circulation network would implement pedestrian amenities consistent with the Street Design Manual.
STR-5. Include new local roads identified in the Mobility section as part of redevelopment.	Consistent - The Mission Valley Community Plan Roadway Network Classification exhibit (Figure 14 of the Mission Valley Community Plan) identifies Riverwalk Street 'U', Riverwalk Drive, and Riverwalk Street 'J' within the Specific Plan area. The project would develop Riverwalk Drive and portions of Street 'J' and Street 'U' necessary for project circulation. IODs would be provided by the project for the future extensions of Street 'J' and Street 'U'.
Transportation Demand Management (TDM)	
TDM-1. Evaluate opportunities to coordinate community circulator routes with neighboring properties as a TDM measure that expands service and access to more community destinations.	Consistent - The project includes a TDM program with the following features:
TDM-2. Consider developing and implementing an approved TDM Plan designed to reduce peak period automobile use and lower the minimum parking requirement on development. Reference San Diego Municipal Code Chapter 14, Article 2, Division 5.	<u>Transit Station</u> <i>The project will construct a new MTS Trolley station in the Mixed-Use Core of the project. The new trolley stop is proposed to be located at the intersection of Street J and Riverwalk Drive to promote transit mobility for all site users as well as residents in the neighboring communities and would be constructed at 3,000 EDUs.</i>
TDM-3. Incorporate mobility hub features such as EV chargers, rideshare pick-up/drop-off space, bicycle parking, and transit information on development.	<u>Mobility Hub at the Transit Station</u> <i>The project will construct a Mobility Hub in conjunction with the new Riverwalk Trolley Station. The hub will provide for multi-modal connectivity with space for private vehicle drop-off, rideshare services, dockless bike and scooter sharing and intra-project shuttle services. The community serving retail use proposed within the Mixed-Use Core will be conveniently located within walking distance to the Mobility Hub patrons. A bike repair station is also proposed as a part of the Mobility Hub.</i>
TDM-4. Designate visible space along the property frontage of development to allow for staging of shared vehicles, bikes, and scooters.	<u>Transit Subsidies</u> <i>The project will provide transit subsidies to both residents and employees. For residential, the project will provide a 25% subsidy. The subsidy value will be limited to the equivalent value of 25% of the cost of an MTS "Regional Adult Monthly/30-Day Pass" (currently \$72 for a subsidy value of \$18 per month). Subsidies</i>
TDM-5. Consider participating in existing TDM programs, including but not limited to those overseen by SANDAG and MTS, in order to: <ul style="list-style-type: none"> • Encourage rideshare and carpool for major employers and employment centers. • Promote car/vanpool matching services. • Continue promotion of SANDAG's guaranteed ride home for workers who carpool throughout Mission Valley. 	
TDM-6. Provide flexible curb space in commercial/retail and residential areas on development to meet the needs of shared mobility services and the changing demands of users.	
TDM-7. Post information related to available transit service and bicycle infrastructure on development to	

<p>encourage the use of alternative transportation modes.</p> <p><i>TDM-8. Consider providing “parking cash out” options to employees—option for employees to receive the cash value of employer-paid parking subsidies in lieu of a parking spot—as an alternative to providing free or subsidized parking or transit passes.</i></p>	<p><i>will be available on a per unit basis to residential tenants and will be offered from the completion of the first dwelling unit until ten years after the opening of the Riverwalk Transit Station. The subsidy will be required of office and retail tenant employees as a lease condition.</i></p> <p><u><i>Last Mile Transportation Options (one of the following at Owner’s Discretion)</i></u></p> <p><i>Up to one shuttle vehicle serving up to 12 passengers. The shuttle will serve to connect office uses south of the river to the mobility hub at the Riverwalk Transit Station. Additionally, the shuttle will connect to the Fashion Valley Transit Center. The shuttle will be implemented upon construction of Riverwalk Phase 3 (south of the river). Hours of operation will be from 6:00 AM to 6:00 PM.</i></p> <p><i>As an alternative, an Autonomous Transportation Service Option may be implemented serving the same equivalent number of passengers via one or multiple vehicles and running during the same hours of operations and same conditions as above.</i></p> <p><i>As an alternative, on-demand Rideshare services may be utilized to serve the same goal via discount codes based on agreements between the employer and rideshare company which enable office tenants to reach the same destinations outlined above during the same hours of operation.</i></p> <p><u><i>Active Transportation</i></u></p> <p><i>The project will construct bicycle facilities which include a combination of Class I paths, Class II buffered bike lanes and Class IV cycle tracks.</i></p> <p><i>The project will construct the San Diego River pathway within the site.</i></p> <p><u><i>Marketing and Information</i></u></p> <p><i>The project will install Transit Boards in the office and residential lobbies.</i></p> <p><i>The project will participate in the SANDAG iCommute Program (to be implemented through a lease provision).</i></p> <p><i>The project will provide SANDAG/MTS Information at Leasing Centers.</i></p>
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	<p><u>Onsite Ride-Sharing, Car-Sharing and Bike or Scooter-Sharing Services</u> The project will coordinate with ride-sharing services such as Uber, Lyft; car-sharing service providers such as Zip Car, Car2Go, etc. and other providers for bike and scooter sharing on the project site and incentivize their use. The project will incorporate pick-up/drop-off zones into the site design to accommodate these ride-sharing services.</p> <p><u>Curb Planning for Shared Mobility Vehicles</u> As a part of the project site design, the project will implement curb management to accommodate shared bicycles, shared scooters and drop-off zones at private drives.</p> <p><u>Parking Management Plan</u> The project will implement unbundled Parking for Residential.</p> <p>The project will implement paid parking for Retail Uses and Visitors to Residential.</p> <p><u>Access to Services That Reduce the Need to Drive</u> The project is a mixed-use development that will include retail services.</p>
Transit	
TRN-1. Support transit stations/bus stops near development by providing access that is visible, convenient, and comfortable to all residents and/or tenants.	<p>Consistent – The Specific Plan includes a proposed transit stop and is located adjacent to the Fashion Valley Transit Center. Within Riverwalk, the trolley plaza and circulation elements would ensure that the transit stop is visible and readily accessible. Development along Fashion Valley Road and within the South District would also be afforded visible access to the Fashion Valley Transit Center.</p>
TRN-2. Design surrounding areas on development that are directly adjacent to transit stops to support a safe and comfortable waiting experience.	<p>Consistent – The transit stop would include a trolley plaza, envisioned to be a core element of the project. Section 6.3.7 of the Riverwalk Specific Plan includes the following discussion:</p> <p><i>The retail/trolley area that makes up the mixed-use center of the North District is intended to be one of Riverwalk's primary entryways and, as such, represents a front door of the neighborhood and window to the public's arrival at Riverwalk via mass transit or passing through on the way to a destination beyond. Riverwalk's Green Line Trolley transit stop and mobility hub serves Riverwalk's residents, as well as the adjacent retail spaces and the Riverwalk River Park and will provide connections to the surrounding communities. The transit stop and mobility hub are</i></p>

	<p><i>integrated with the retail area and provide activated uses fronting on to the north side of the platform. The south side of the platform opens out to the San Diego River and the Riverwalk River Park, offering expansive and stunning views of the Riverwalk River Park, Mission Hills, and the entire south mesa in the distance. The proximity of the retail and park space to the transit stop offers an experience truly unlike any other in San Diego.</i></p> <p><i>The character of this area is envisioned to be a mix of office and retail uses on the ground level, fronting the streets and public spaces such as plazas. While residential use is not precluded from the ground level in this area, in order to promote enlivenment throughout the day, residential uses should include active elements such as ground floor private open space and/or direct access to the public realm as described in Section 6.3.7, Building to Street Relationship, of the Riverwalk Specific Plan. Above the first floor, a mix of office and residential, depending upon market conditions, is encouraged to contribute to the 24-hour life of the mixed-use core, which supports place-making and adds passive security. The combination of uses and emphasis on ground level activation will create a vibrant and inviting neighborhood. Should residential be included on the ground floor, emphasis shall be added to energize the pedestrian-level through patios and plazas, ground floor entries to individual units, and patio spaces interspersed into the public interface.</i></p>
TRN-3. Provide wayfinding signage to guide pedestrians from within a development to a transit stop.	<p>Consistent – Wayfinding is discussed throughout the Specific Plan (including within the Inspiration and Vision, Chapter 2, <i>Land Use</i>, and Chapter 6, <i>Land Uses, Developments Standards, and Design Guidelines</i>), as it is critical for the successful integration of uses within a walkable, pedestrian-friendly environment. Appropriate wayfinding would be provided.</p>
Walkability	
WLK-1. Designate public access easements on development that are consistent with the planned paseos identified in Figure 5 of the Mission Valley Community Plan.	<p>Consistent – The pedestrian circulation plan for Riverwalk (see Figure 3-4 of this EIR) is consistent with the planned pedestrian improvements on Figure 5 of the Mission Valley Community Plan.</p>
WLK-2. Include adequate lighting for pedestrian and cyclist safety and comfort on pedestrian and bicycle connections, particularly along freeway and bridge underpasses, and along the San Diego River Trail.	<p>Consistent – Outdoor lighting is addressed in Section 6.5.10 of the Riverwalk Specific Plan.</p> <p>The following additional policies and regulations address lighting:</p> <ul style="list-style-type: none"> • <i>Policy-25. Lighting should be used to illuminate architectural treatments, focal areas, paths, entry</i>

	<p>points, and security purposes. As lighting is an integral feature in the sense of place, care should be taken to integrate the lighting into the overall design of the site and the neighborhood. Lighting integration also ensures that accidental spillover into natural areas not intended to be lit is avoided.</p> <ul style="list-style-type: none"> • Policy-49. Safety lighting adjacent to the San Diego River corridor must be directed lighting, as opposed to general lighting, to prevent spill-over and illumination of habitat areas in compliance with the City's MHPA adjacency guidelines. • Reg-109. The primary pedestrian paths shall have adequate security lighting and signage to provide for the safety of the users. • Reg-117. All bikeways shall have adequate lighting and signage to provide for the safety of the users as determined by the City Engineer. Lighting and signage within 100 feet of the River Corridor Area shall be shielded and directed away from the River Corridor Area.
WLK-3. Provide shade-producing street trees and street furnishing near schools and transit stops on development.	Consistent – The Riverwalk Street Tree and Greenbelt Trees map (see Figure 5.3-2 of this EIR) includes shade trees along streets. No schools are planned for Riverwalk, but the plaza at the transit stop would include landscaping, with a requirement to provide trees.
WLK-5. Include a publicly accessible through-block connection to provide access to the San Diego River Trail on development adjacent to the San Diego River, consistent with the requirements of the San Diego River Park Master Plan.	Consistent – Access regulations to the River Corridor Area from the River Influence Area are included in Section 6.5.16 of the Riverwalk Specific Plan, consistent with the San Diego River Park Master Plan.
Parks	
Park Development, Improvements, and Expansions	
PDI-1. Locate public parks on development, where feasible.	Consistent – The project would develop public parks and publicly-accessible park space on-site.
PDI-2. Follow park improvement and expansion standards set forth in Council Policy 600-33 and 600-11.	Consistent – The project would not include any existing parks; therefore, there are no parks to improve or expand. Riverwalk includes the development of new parks.
<p>PDI-3. Satisfy population-based park requirements for any proposed portion of a private development by:</p> <ul style="list-style-type: none"> • Not restricting or limiting the use of the park or facility to any person because of race, religion, or creed, or limit availability of the park or facility for the use of the general public. • Being permanent. This would mean that the development has an estimated useful life equivalent to that of similar installations on City-owned and developed parks. 	Consistent – Public parks within Riverwalk would not have discriminatory access. The public parks would be open to the public. Public parks would be permanent features of the project.
Public Open Space on Private Development	

<p><i>POD-1. Calculate park acreage based on “usable acres” as defined in the General Plan Glossary.</i></p>	<p>Consistent - In consultation with the Planning and the Parks & Recreation Departments, the usable park acreage was determined, per the General Plan.</p> <p>The project contains roughly 51.1 acres of park that meet the definition of “useable acres” with slopes between two percent and 10 percent. This park space would provide for a variety of recreational programs of an active nature common to local parks in the City of San Diego (such as ball games or court games). Unstructured public recreational activities, such as children’s play areas, appreciation of open spaces, or a combination thereof, would be provided, unconstrained by environmental restrictions that would prevent its use as a park and recreation facility; free of structures, roads, or utilities; and unencumbered by easements of any kind. Additionally, there are roughly 11.9 acres of recreation spaces that exceed a 10 percent slope and either designed as active recreation space or natural open spaces.</p>
<p><i>POD-2. Locate open spaces so they are physically and visually accessible from the sidewalk and visible from the street.</i></p>	<p>Consistent - The Specific Plan provides for approximately 10 acres of privately-owned publicly-accessible park space. These park spaces would be located in the North and Central Districts and would be open to the public via a recreation easement. Any ground floor uses fronting these parks spaces would comply with the Park Activation Interface, as described in Section 6.4.6 of the Riverwalk Specific Plan:</p> <p><i>Riverwalk is characterized by a series of linear parks that provide connectivity to land uses and development areas of Riverwalk. The primary linear park interface (Figure 6-4, Linear Park Activation Interface Illustrative, of the Riverwalk Specific Plan) occurs along the north-south linear park that connect Friars Road to the Riverwalk River Park, as well as along the Riverwalk River Park. Along the linear park, activation will be accomplished by:</i></p> <ul style="list-style-type: none"> • <i>Ground floor patios shall feature connection to the sidewalk, where possible.</i> • <i>Pathways shall lead from the sidewalk through the park to arrive at building lobbies and patios.</i> • <i>Primary or secondary building entrances, regardless of use, shall face the linear park.</i> • <i>Entrances shall include such features as canopies and/or architecturally integrated building names and addresses to provide visual interest along the park.</i>
<p><i>POD-3. Locate publicly-accessible open space at the ground floor near the center of activity nodes or along pedestrian connections to facilitate pedestrian access and encourage a variety of spillover activities.</i></p>	
<p><i>POD-4. Orient and design publicly accessible open space to maximize comfort and provide refuge from the heat during summer months.</i></p>	
<p><i>POD-5. Provide a variety of areas with sun, shade, and pedestrian-scaled lighting.</i></p>	
<p><i>POD-6. Use landscaping and architectural components to define publicly accessible spaces and express neighborhood identity.</i></p>	
<p><i>POD-7. Offer a range of seating and activity options, including children’s play equipment and pet relief areas.</i></p>	
<p><i>POD-8. Ensure indoor publicly accessible open spaces are visible from streets; have tall ceilings and glazing to allow natural light; provide opportunities for seating and public art display; and be free of private logos, signs, or markings.</i></p>	
<p><i>POD-9. Coordinate seating, planting, and building entries to create areas for groups and individuals.</i></p>	
<p><i>POD-10. Provide wayfinding signage that conveys a welcoming message to the public.</i></p>	

Private Open Space Development	
PSD-1. Allow for public, semi-public, and private spaces through site-design that incorporates variation in scale.	<p>Consistent – The Riverwalk Specific Plan includes a discussion of private open space in Section 3.2.3:</p> <p><i>Private open space (also referred to in the LDC as common open space) is any privately constructed and maintained outdoor space articulated for human use and/or relaxation. Private open space is an exclusive-use area for a specific development(s) to serve its residents, employees, and/or visitors. This includes, but is not limited to, plazas, paseos, courtyards, seating areas, recreational areas, viewing areas, children's play areas, picnic areas, pools, and other amenity areas.</i></p>
PSD-2. Define “private” spaces with visual cues such as fences, walls, hedges, trees, and buffer plantings.	Consistent – Private open space would be clearly demarcated from the public realm, consistent with development practices.
PSD-3. Activate and populate private open spaces through successful programming with other uses. This could be achieved through adjacency to outdoor seating of a café or live events.	Consistent – Private open spaces envisioned for Riverwalk would allow for programming and activation. This may occur more organically, as with play areas, pools, and recreational spaces, or may be included as part of individual development social programs that may occur in gathering spaces. In mixed-use settings, activation may occur due to adjacent uses.
PSD-4. Incorporate elements into communal areas that encourage social interactions between residents through community gardens, pavilions, “Little Lending Libraries”, or other elements.	Consistent – The Specific Plan includes potential types of private open space that would encourage resident interaction, such as seating areas, recreational, areas, pools, children’s play areas, and picnic areas. The Specific Plan does not preclude other forms of private open space that may provide for additional interaction.
PSD-5. Compose exterior usable open area of moderately level land with a gradient of less than 10 percent.	Consistent – Useable exterior open space would be calculated in conformance with LDC regulations.
PSD-6. Design usable open area as gardens, courtyards, terraces, roof-decks, recreation facilities; swimming pools and spas with associated decking; private exterior balconies; lawns or other landscaped areas beyond required setbacks; and walkways or pathways not subject to vehicular access. Usable open space should not be located within required setbacks.	Consistent – The examples of private open space included within the Specific Plan (<i>plazas, paseos, courtyards, seating areas, recreational areas, viewing areas, children's play areas, picnic areas, pools, and other amenity areas</i>) would all be useable.
PSD-7. Ensure usable open area is a minimum of 6 feet in each dimension (width and length).	Consistent - The examples of private open space included within the Specific Plan (<i>plazas, paseos, courtyards, seating areas, recreational areas, viewing areas, children's play areas, picnic areas, pools, and other amenity areas</i>) are of a size and scale that would be anticipated to have a minimum of six feet in each dimension.
Development Adjacent to Open Space	

AOS-1. Maintain contiguous public access immediately adjacent to the open space edge or boundaries.	Consistent – Public access would be provided by the San Diego River Pathway and the trails network of the Riverwalk River Park. However, no access to the river or within the no use buffer would be provided, for safety of individuals and to protect the ecology of the San Diego River.
AOS-2. Prohibit parking contiguous to the open space boundary.	Consistent – Parking relative to the San Diego River is regulated in Section 6.5.16 of the Riverwalk Specific Plan, which incorporates recommendations from the San Diego River Park Master Plan.
AOS-3. Utilize on site open space and/or accessible pathways to buffer buildings from adjacent open space when siting development.	Consistent – The San Diego River would be buffered from the development areas by the 50-foot no use buffer and Riverwalk River Park.
AOS-4. Abut the open space boundary with common spaces.	Consistent – The San Diego River would be abutted by the Riverwalk River Park.
AOS-5. Provide open space linkages, trail heads, and bike/pedestrian access on development. All access points to the canyon hillsides and open spaces should be visible and clearly marked.	Consistent – The Riverwalk River Park includes a system of trails for pedestrian and bicycle use.
AOS-6. Incorporate landscaping that complements the existing open space plant palette to serve as a visual extension of the open space on development.	Consistent – Barrier planting along the San Diego River reflects naturally occurring species and species of cultural significance. These species would tie into the existing flora of the San Diego River channel.
AOS-7. Follow the City's MHPA Land Use Adjacency Guidelines, which address indirect effects on the MHPA from adjacent development, on development adjacent to MHPA lands. Follow all Land Use Adjacency Guidelines, especially the guidance on grading and land development including drainage, toxic substances in runoff, lighting, barriers, invasive plant species, brush management, and noise.	Consistent – See analysis under Issue 5 of this EIR section.
Resource Protection	
Open Space	
OSP-1. Provide for water storage in open space after rain events as long as resource protection is not inhibited.	Consistent – Section 5.12, <i>Hydrology</i> , addresses site flooding during storm events. Development of Riverwalk would not rise water levels up- or down-stream in a storm event and flood waters would be handled on-site without adverse effect on resources or development.
OSP-2. Develop trails within areas designated for open space as long as the beneficial uses, functions, and values of the area are not compromised.	Consistent – Trails would be located within the active and passive park areas of the Riverwalk River Park. No trails would be located within the no use buffer, so as to ensure that river ecology is not compromised.
Historic Preservation	
HSP-1. Conduct project-specific investigations in accordance with all applicable laws and regulations to identify potentially significant tribal cultural and archaeological resources.	Consistent – Historical resources and tribal cultural resources are discussed in Section 5.6 and Section 5.10, respectively. Analysis in these sections includes evaluation of impacts and presents mitigation measures. All impacts would be mitigated to below a level of significance.
HSP-2. Conduct project-specific Native American Kumeyaay consultation early in the development	

<p>review process to ensure culturally appropriate and adequate treatment and mitigation for significant archaeological sites or sites with cultural and religious significance to the Native American Kumeyaay community in accordance with all applicable local, state, and federal regulations and guidelines.</p>	
<p><i>HSP-3.</i> Ensure adequate data recovery and mitigation for adverse impacts to archaeological and Native American Kumeyaay sites as part of development; including measures to monitor and recover buried deposits from the tribal cultural, archaeological, and historic periods, under the supervision of a qualified archaeologist and a Native American Kumeyaay monitor.</p>	
<p><i>HSP-4.</i> Consider eligible for listing on the City's Historical Resources Register any significant archaeological or Native American Kumeyaay cultural sites that may be identified as part of future development within Mission Valley, and refer sites to the Historical Resources Board for designation, as appropriate.</p>	
Sustainability	
Green Building Practices	
<p><i>GBP-1.</i> Encourage the use of sustainable building practices. Buildings should strive to qualify for LEED accreditation.</p>	<p>Consistent – The Riverwalk Specific Plan encourages sustainable building practices and addresses sustainability in Section 6.5.13, <i>Sustainable Features</i>.</p>
<p><i>GBP-2.</i> Building heat gain should be reduced through at least three of the following measures:</p> <ul style="list-style-type: none"> • Orient buildings to minimize east and west facing facades. • Configure buildings in such way as to create internal courtyards to trap cool air while still encouraging interaction with streets and open spaces. • Design deep-set fenestration on south facing facades and entries. • Utilize vertical shading and fins on east and west facing building facades. • Using horizontal overhangs, awning or shade structures above south facing windows to mitigate summer sun but allow winter sun. Encourage overhang width to equal half the vertical window height to shade the window from early May to mid-August but still allowing the winter sun. • Install high vents or open windows on the leeward side of the buildings to let the hottest air, near the ceiling, escape. • Create low open vents or windows on the windward side that accepts cooler air to replace the hotter air. 	<p>Consistent – The Riverwalk Specific Plan includes the following policy relative to heat gain:</p> <ul style="list-style-type: none"> • <i>Policy-88. Overhangs or canopies should be used, where possible, to shade areas from direct sunlight and reduce heat gain.</i> <p>Building design for future development would also take into consideration measures to reduce heat gain, in accordance with sustainable building practices and regulations of Title 24 (or its successor in place at the time of development).</p>

<ul style="list-style-type: none"> • Include high ceiling vaults and thermal chimneys to promote rapid air changes and to serve as architectural articulation for buildings. 	
<p>GBP-3. Consider the solar access of neighboring buildings to the maximum extent practical, so as not to inhibit neighboring solar access.</p>	<p>Consistent – The Riverwalk Specific Plan includes the following policy relative to solar access:</p> <ul style="list-style-type: none"> • <i>Policy-21. Building placement should consider indoor and outdoor privacy, solar access, public and private open space, and overall aesthetics.</i>
Smart Cities	
<p>SMC-1. Consider providing priority parking and charging stations (preferably solar) to promote sustainable practices and accommodate the use of Electric Vehicles (EVs), including smaller short-distance neighborhood electric vehicles.</p>	<p>Consistent – The Riverwalk Specific Plan includes the following policy and regulation relative to environmentally-superior vehicle options:</p> <ul style="list-style-type: none"> • <i>Policy-89. Promote the use of fuel efficient vehicles through such provisions as electric vehicle charging areas and designated parking for low-fuel/energy efficient vehicles, as well as carpool/vanpool parking.</i> • <i>Reg-131. Provide electric vehicle-ready parking as required by code.</i> <p>Actual location of parking, including priority parking considerations, would be determined at the time individual developments come online.</p>
<p>SMC-2. Consider lighting with adaptive controls for energy efficiency and to minimize light pollution.</p>	<p>Consistent – The Riverwalk Specific Plan includes the following policy relative to sustainable lighting:</p> <ul style="list-style-type: none"> • <i>Policy-75. Low-wattage and/or LED light features, lighting controls, zoned lighting banks, and time-controlled lighting for public areas should be used.</i>
<p>SMC-3. Install and dedicate appropriate communications infrastructure to run from a connection point in a building to the lot line adjacent to a public right-of-way where there exists or may exist in the future a fiber optic broadband network.</p>	<p>Consistent – Appropriate communications infrastructure would be determined and implemented in a phased manner commensurate with project development.</p>
Well-being	
Emergency Access and Incident Prevention	
<p>EAI-1. Ensure that building siting and designs provide for adequate emergency access on development and redevelopment.</p>	<p>Consistent – The project has been reviewed by San Diego Fire-Rescue for consistency with requirements, including access. Future developments would also require Fire-Rescue sign off at building permit stage to ensure risk to fire is minimized and regulations are met.</p>
<p>EAI-2. Design and develop sites to minimize the likelihood of a wildfire spreading to structures by managing flammable vegetation within a development.</p>	
<p>EAI-3. Use a point-based system with coordinate locations as opposed to a system that is centerline-based on large-scale developments that include a new addressing system.</p>	<p>Consistent - Review of future projects developed under the Specific Plan would be conducted by San Diego Fire-Rescue Department to ensure this policy is implemented.</p>

EAI-4. Share emergency access lanes between developments as long as the shared lane provides the same level of access as two individual lanes, or gaps can be mitigated through other emergency access points.	Consistent – Where possible, shared access lanes would be explored as future development comes online.
EAI-5. Minimize the number of curb cuts and other intrusions of vehicles across sidewalks to reduce conflict points and promote pedestrian and cyclist safety.	Consistent – The Riverwalk Specific Plan includes the following policies to minimize conflict points between pedestrians/bicyclists and vehicles: <ul style="list-style-type: none">• <i>Policy-60. Active transportation internal circulation paths should be provided to minimize conflicts between pedestrians and automobile traffic. Additionally, sidewalks will be provided within Riverwalk along all public streets.</i>• <i>Policy-75. Driveway entrances to parking areas should minimize disturbances to the pedestrian continuity of the sidewalk areas.</i>
Noise	
NOI-1. Include building design techniques that address noise exposure and the insulation of buildings to reduce interior noise levels to acceptable limits on development within 500 feet of the freeway. Methods may include, but are not limited to, forced-air ventilation systems, double-paned or sound rated windows, sound insulating exterior walls and roofs, and attic vents.	Consistent – As discussed in Section 5.8, <i>Noise</i> , the project would not result in excess noise exposure to occupants. Individual buildings and development would be required to adhere to City of San Diego noise attenuation requirements for interior noise. Exterior noise would not exceed acceptable levels for outdoor park spaces. Existing noise levels do not exceed 75 dBA. Any future residential use above the 70 dBA CNEL must include noise attenuation measures to ensure an interior noise level of 45 dBA CNEL and be located in an area where a community plan allows multiple unit and mixed-use residential uses, as required by the General Plan. Further, a regulation within the Specific Plan prohibits balconies for any residential development facing I-8 where noise levels exceed 70 dBA (Reg-194).
NOI-2. Include site planning techniques to help minimize exposure of noise sensitive uses to rail corridor and trolley line noise on a development.	
Geologic and Seismic Hazard Prevention	
GSH-1. Mitigate adverse effects of ground shaking through ground improvement and/or the use of proper engineering design.	Consistent – The project would not result in impacts due to geologic conditions and seismic risk. No mitigation is required. Site grading and preparation for development would include removal and recompaction of soils, as necessary. See Section 5.11, <i>Geologic Conditions</i> , for a discussion of site geology and seismic risk.
GSH-2. Remove and replace vulnerable soils with compacted fill, if structures are planned in vulnerable soil areas, to mitigate the potential of soil settlement.	
GSH-3. Employ mitigation to avoid surface ruptures caused by faulting from the nearest Rose Canyon Fault, including but not limited to, setting back structures for human occupancy away from the surface trace of clearly-defined faults or through foundation design that mitigates surface fault rupture.	
GSH-4. Consider removing loose soils and replacing them with compacted fill to reduce liquefaction; using support structures with deep foundations, which	

extend through liquefiable materials; or using suitable ground improvement techniques such as stone columns or deep dynamic compaction.	
<i>GSH-5.</i> Practice avoidance, removal of the deposits, or geotechnical and/or structural engineering to mitigate the potential of landslides.	
Flooding and Sea Level Rise	
<i>FSR-1.</i> Incorporate best management practices (BMPs), on development that address storm water runoff from the development area using the most current regulations established by the Regional Water Quality Control Board.	Consistent – The project would not result in impacts to storm water runoff. See Section 5.12, <i>Hydrology</i> , of this EIR for a discussion of drainage and runoff.
<i>FSR-2.</i> Conform development and redevelopment to current federal, state, and local flood proofing standards and siting criteria to prevent San Diego River flow obstruction.	Consistent – The project would not result in impacts relative to flooding. See Section 5.12, <i>Hydrology</i> , of this EIR for a discussion of special flood hazard areas.

Table 5.1-4. City of San Diego Noise Compatibility Guidelines

Land Use Category	Exterior Noise Exposure (dBA CNEL)				
	60	65	70	75	
<i>Parks and Recreational</i>					
Parks, Active and Passive Recreation					
Outdoor Spectator Sports, Golf Courses; Water Recreational Facilities; Indoor Recreation Facilities					
<i>Agricultural</i>					
Crop Raising and Farming; Community Garden, Aquaculture, Dairies; Horticulture Nurseries & Greenhouses; Animal Raising, Maintain & Keeping; Commercial Stables					
<i>Residential</i>					
Single Dwelling Units; Mobile Homes		45			
Multiple Dwelling Units *For uses affected by aircraft noise, refer to Policies NE-D.2. & NE-D.3.		45	45*		
<i>Institutional</i>					
Hospitals; Nursing Facilities; Intermediate Care Facilities; Kindergarten through Grade 12 Educational Facilities; Libraries; Museums; Child Care Facilities		45			
Other Educational Facilities Including Vocational/Trade Schools; Colleges and Universities		45	45		
Cemeteries					
<i>Retail Sales</i>					
Building Supplies/Equipment; Food, Beverages & Groceries; Pets & Pet Supplies; Sundries, Pharmaceutical & Convenience Sales; Wearing Apparel & Accessories			50	50	
<i>Commercial Services</i>					
Building Services; Business Support; Eating & Drinking; Financial Institutions; Maintenance & Repair; Personal Services			50	50	
Assembly & Entertainment (includes public and religious assembly); Radio & Television Studios; Golf Course Support					
Visitor Accommodations		45	45	45	
<i>Offices</i>					
Business & Professional; Government; Medical, Dental & Health Practitioner; Regional & Corporate Headquarters					
<i>Vehicle and Vehicular Equipment Sales and Service Use</i>					
Commercial or Personal Vehicle Repair & Maintenance; Commercial or Personal Vehicle Sales & Rentals; Vehicle Equipment & Supplies Sales & Rentals; Vehicle Parking					
<i>Wholesale, Distribution, Storage Use Category</i>					
Equipment & Materials Storage Yards; Moving & Storage Facilities; Warehouse; Wholesale Distribution					
<i>Industrial</i>					
Heavy Manufacturing; Light Manufacturing; Marine Industry; Trucking & Transportation Terminals; Mining & Extractive Industries					
Research & Development				50	
Compatible	Indoor Uses	Standard constructions 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.			

Land Use Category			Exterior Noise Exposure (dBA CNEL)				
			60	65	70	75	
45, 50	Conditionally Compatible	Indoor Uses	Building structure must attenuate exterior noise to the indoor noise level indicated by the number (45 or 50) for occupied areas. Refer to Section I.				
		Outdoor Uses	Feasible noise mitigation techniques should be analyzed and incorporated to make the outdoor activities acceptable. Refer to Section I.				
	Incompatible	Indoor Uses	New construction should not be undertaken.				
		Outdoor Uses	Sever noise interference makes outdoor activities unacceptable.				

Table 5.1-6. Riverwalk Tailored Development Standards

Code Section	Code Requirement	Tailored Development Standard ¹
Minimum Street Frontage – CC-3-9 zone (LDC Table 131-05E)	25 feet	Lots 38, 41, NN, PP, RR, and ZZ do not front on public streets.
Minimum Street Frontage – RM-4-10 zone (LDC Table 131-05E)	25 feet	Lots 30, 31, AA, BB, DD, EE, and LL do not front on public streets.
Maximum Front Setback – CC-3-9 zone (LDC Table 131-05E)	10 feet	Lots (7 through 12) front on Friars Road and the internal spine road (Streets 'D1', 'D2', and 'E'). A significant grade differential between the streets restricts the ability of future buildings to adhere to the maximum 10-foot setback on Friars Road; therefore, the project requests the maximum setback for Friars Road be set at 40-feet. This will also provide opportunities for pocket and mini parks, while ensuring that development along Friars road blends with the surrounding community.
Determining Yards (LDC §113.0276)	<p>Front Yard. The front yard is determined first. It is the area between the front property line and the front setback line and extends the full width of the lot.</p> <p>Rear Yard. The rear yard is determined after the front and street side yards. It is the area between the rear property line and the rear setback line that extends along the width of the lot between the rear property line and the rear setback. It does not include the street side yard if one exists.</p>	Within areas that abut the existing circulation element roadways, lots are created that have two front yards – the internal street and the parallel existing external roadway. These lots include Lots 5 through 7 and lots 11 through 14 abutting Friars Road and internal Streets 'D1', 'D2', and 'E'. Keeping with the principle theme of the design guidelines to strongly encourage buildings to engage with the street and create public spaces that foster pedestrian activity within a neighborhood center-feel, the front yards abutting the external street may be considered "rear yards."

Code Section	Code Requirement	Tailored Development Standard ¹
		The front yard for Lots 16, 30, 31, and 41 shall be the abutting private driveway for purposes of determining setbacks and activating the pedestrian realm.
Maximum Floor Area Ratio – CC-3-9 zone (LDC §131.0546 (a))	6.0 (2.0 base FAR with 3.0 FAR Bonus for Residential Mixed Use + FAR for mixed-use underground parking equal to gross floor area of underground parking not to exceed 1.0)	6.0 (without requirement for Residential Mixed-Use + FAR for mixed-use underground parking equal to gross floor area of underground parking not to exceed 1.0)
Maximum Permitted Residential Density – CC-3-9 zone (LDC Table 131-05E)	Minimum 400 square feet per unit	Minimum 200 square feet per unit
Minimum Floor Area Ratio for Residential Use – CC-3-9 zone (LDC Table 131-05E)	2.0	1.0
Ground Floor Restrictions – CC-3-9 zone (LDC §131.0540 (c))	Residential use and residential parking prohibited on the ground floor in the front 30 feet of the lot.	Residential use and residential parking permitted on the ground floor in the front 30 feet of the lot. This definition does not apply to Lots 9, 10, 22, 23, and 24. For lots within the South District (Lots 43 through 52), residential use on the ground floor is allowed but limited to residential lobbies and leasing offices.
Private Exterior Open Space in the RM Zones – RM-4-10 zone (LDC §131.0455(d))	Within residential developments, at least 50 square feet of usable, private, exterior open space abutting each dwelling unit shall be provided with a minimum dimension of four feet.	Within residential developments, at least 40 square feet of usable, private, exterior open space abutting each dwelling unit shall be provided with a minimum dimension of four feet. Where private exterior open space is not provided at the quantity required, an equal amount of common exterior open space shall be added to the common exterior open space requirements of LDC §131.0456.

Code Section	Code Requirement		Tailored Development Standard ¹	
			This Tailored Development Standard also applies to residential units developed in the CC-3-9 zone.	
Lot Coverage in Residential Zones – RM-4-10 zone (LDC §131.0445(d))	Minimum Lot Coverage	--	Minimum Lot Coverage	35% ²
	Maximum Lot Coverage	50% (60% corner lots)	Maximum Lot Coverage	75%
Storage Requirements in the RM Zones – RM-4-10 zone (LDC §131.0454)	Each dwelling unit shall have a fully enclosed, personal storage area outside the unit that is at least 240 cubic feet with a minimum 7-foot horizontal dimension along one plane.		Residential developments shall provide personal storage at a minimum rate of 0.5 storage units per residential unit, at a minimum size of 120 cubic feet. This Tailored Development Standard also applies to residential units developed in the CC-3-9 zone.	
General Regulations for Refuse and Recyclable Material Storage (LDC §142.0810(b)(6))	For commercial development on premises not served by an alley, material storage areas shall be located at least 25 feet from any street or sidewalk.		--	
Minimum Exterior Refuse and Recyclable Material Storage Areas for Residential Development (LDC Table 142-08B)	Minimum requirements included in Table 142-08B and 142-08C.		Developments shall provide a minimum of 50 percent refuse and recyclable storage areas, included in LDC Table 142-08B and/or 142-08C.	
Minimum Exterior Refuse and Recyclable Material Storage Areas for Nonresidential Development (LDC Table 142-08C)			In consultation with staff, developments may provide less storage area square footage where it can be demonstrated that the reduced storage area meets the intention of the requirements of LDC Table 142-08B or LDC Table 142-08C. Comparable capacity within smaller storage areas may be accomplished with the use of compactors, more regular refuse and recyclables pick up, a combination of the two, or other innovative methods of refuse and recyclable storage and/or collection.	

Code Section	Code Requirement	Tailored Development Standard ¹
Required Off-Street Loading Spaces (LDC Table 142-10B)	No on-street loading allowed.	On-street loading may be provided at a maximum rate of one loading space per building in lieu of, or in addition to, required off-street loading spaces, as defined in LDC Table 142-10B. Each on-street loading space must have a minimum length of 40 feet and a minimum width of 12 feet. With adequate signage, this loading area can be converted to other uses (parking, passenger drop-off, etc.) during non-business hours.
Retaining Wall Regulations in All Zones (LDC 142.0340(c)(1) & (3))	<p>(c)(1) Two retaining walls with a maximum height of 3 feet each are permitted in the required front and street side yards if the two retaining walls are separated by a minimum horizontal distance equal to the height of the upper wall.</p> <p>(c)(3) Retaining walls of 3 feet in height or greater shall have at least one horizontal or vertical offset for each 120 square feet of wall area, except where otherwise provided in Section 142.0340(f). The horizontal or vertical offset shall be at least 12 inches wide with a minimum reveal of 4 inches.</p>	<p>The retaining walls on the southern boundary of Lot QQ, adjacent to the transit/trolley stop, and the southeastern corner of Lot SS are in excess of three-feet and necessary to support the MTS Trolley Tracks. Two three-foot retaining walls will not provide the needed separation for Street J to cross under the MTS Trolley Tracks; therefore, a single retaining wall, that ranges in height from twenty-three feet to less than three-feet is allowed, provide it includes landscaping such as vines and trees to assist with masking the wall</p> <p>Vertical or Horizontal offsets every 120 square-feet of wall area is not practical for a retaining wall that reaches a height of twenty-three-feet. Offsets shall be provided through the use of vines, trees, or other landscaping elements.</p>
Retaining Wall Regulations in All Zones (LDC 142.0340(e))	Retaining wall Height Outside of Required Yards: Retaining walls located outside of the required yards shall not exceed 12 feet in height.	The retaining wall located near the rear of Lot 28 is not visible from a public right-of-way and is largely lower than the elevation of the MTS Trolley Tracks which are adjacent to the rear of Lot 28. Since the retaining wall is provided to allow access to a Public

Code Section	Code Requirement	Tailored Development Standard ¹
		Utility facility that crosses under the MTS Trolley Tracks, it cannot be screened with trees or shrubs; however, it will be screened with vines plant above and below the wall.
Retaining Wall Regulations (LDC 142.0340(c)(1) & (3))	<p>(1) Two Retaining walls with a maximum height of 3 feet each are permitted in the required front and street side yards if the two retaining walls are separated by a minimum horizontal distance equal to the height of the upper wall.</p> <p>(3) Retaining walls of 3 feet in height or greater shall have at least one horizontal or vertical offset for each 120 square feet of wall area, except where otherwise provided in Section 142.0340(f). The horizontal or vertical offset shall be at least 12 inches wide with a minimum reveal of 4 inches.</p>	<p>The retaining walls on the southern boundary of Lot QQ adjacent to the transit/trolley stop and the southeastern corner of Lot SS are in excess of three feet and necessary to support the MTS Trolley Tracks. Two three-foot retaining walls would not provide the needed separation for Street 'J' to cross under the MTS Trolley Tracks; therefore, a single retaining wall that ranges in height from 23 feet to less than three feet would be allowed, provided the wall includes landscaping such as vines and trees to assist with masking the wall.</p> <p>Vertical or horizontal offsets every 120 square feet of wall area is not practical for a retaining wall that reaches a height of 23 feet. Offsets would be provided through the use of vines, trees, or other landscaping elements.</p>
Retaining Wall Regulations (LDC 142.0340(e))	Retaining Wall Height Outside of Required Yards Retaining walls located outside of the required yards shall not exceed 12 feet in height.	The retaining wall located near the rear of Lot 28 would not visible from a public right-of-way and is largely lower than the elevation of the MTS Trolley Tracks, which are adjacent to the rear of Lot 28. Since the retaining wall would be provided to allow access to a Public Utility facility that crosses under the MTS Trolley Tracks, it cannot be screened with trees or shrubs; however, it would be screened with vines plant above and below the wall.

Code Section	Code Requirement	Tailored Development Standard ¹
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¹ See Appendix A of the Riverwalk Specific Plan for Riverwalk Lot Configuration exhibit. Lot line adjustments and lot consolidations do not require an amendment to the Riverwalk Specific Plan or the Vesting Tentative Map.

²The minimum lot coverage in the RM-4-10 zone does not apply to the lettered lots, including the park and open space parcels.

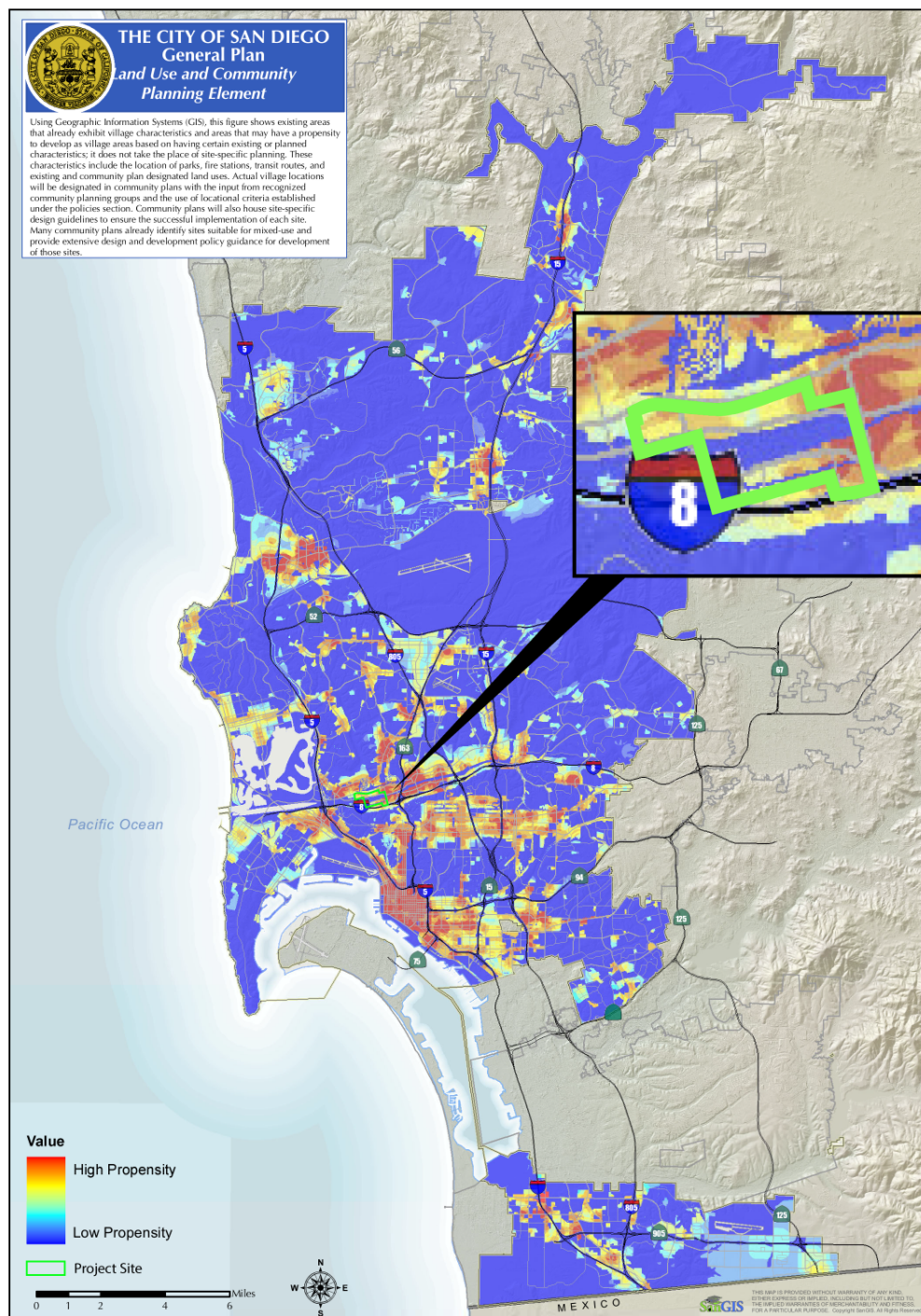


Figure 5.1-1. City of San Diego Village Propensity Map

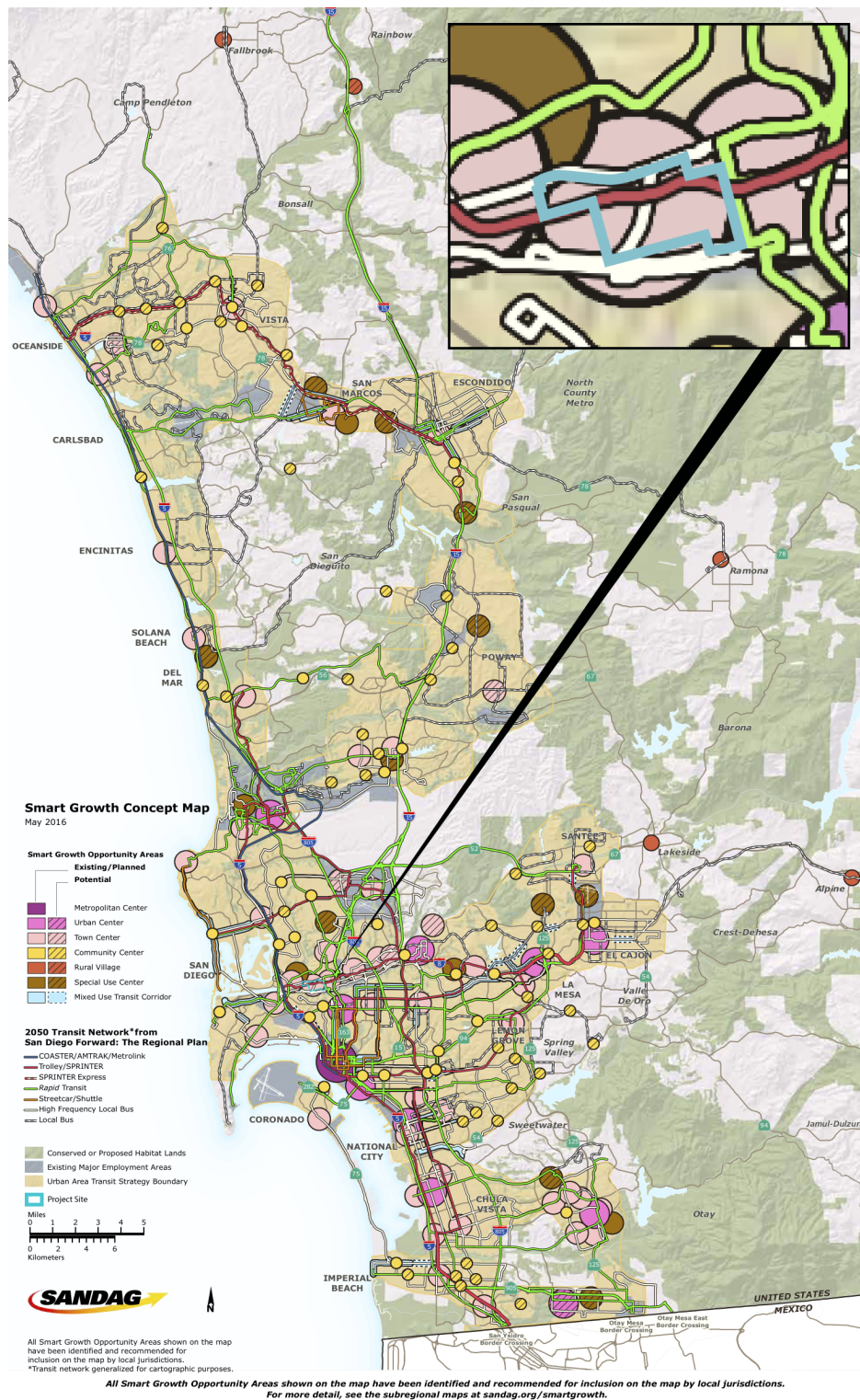


Figure 5.1-2. SANDAG Smart Growth Concept Map

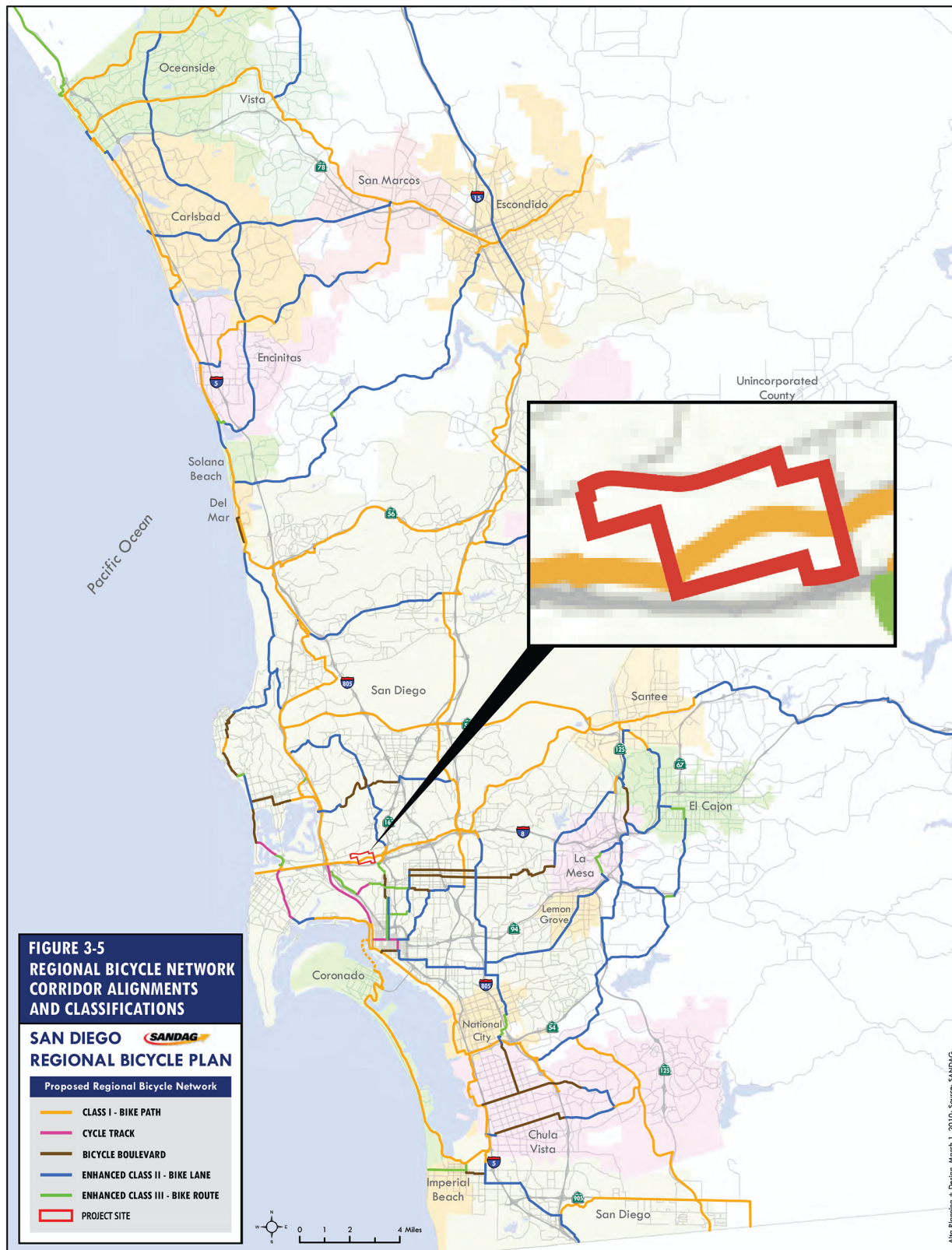


Figure 5.1-3. Regional Bicycle Network Connectivity

5.2 Transportation and Circulation

This section evaluates potential transportation impacts associated with the project. The following discussion is based on the *Transportation Impact Analysis* (TIA), prepared by Linscott, Law, and Greenspan Engineers (LLG) and Urban Systems Associates, Inc. (USAI), dated March 20, 2020, and the *Mobility Assessment* (MA), also prepared by LLG and USAI, dated May 8, 2020, and are included as Appendices D and L, respectively. The TIA uses VMT as the metric.

5.2.1 Existing Conditions

The project site encompasses approximately 195 acres and is currently developed with the Riverwalk Golf Course, which consists of three nine-hole courses; clubhouse building; driving range; and associated driveways, surface parking, and various maintenance and related facilities. Situated in the western portion of central Mission Valley, the project site abuts Friars Road on the north, Fashion Valley Road on the east, a portion of Hotel Circle North on the south, and privately-owned residential property to the west. The San Diego River and the MTS Green Line Trolley traverse the project site in an east-west direction. The Green Line Trolley provides transit connections through Mission Valley to the Old Town multi-modal transit facility located in Old Town (west of the project site) and to San Diego State University, SDCCU Stadium, and the cities of La Mesa, El Cajon, and Santee located east of the project site.

5.2.1.1 Roadway Network

Regional access to the site is provided by I-8, located immediately south of the project site, SR 163, located approximately one mile east of the project site; and (I-5, located less than two miles west of the project site. Primary vehicle access would occur at Fashion Valley Road from the east, Hotel Circle North from the south, and Friars Road from the north.

Interstate 8

I-8 is a major east-west Interstate Freeway providing inter-regional connectivity between San Diego County and Imperial County to the east. Within the project area, I-8 generally consists of eight travel lanes in the east-west direction with additional auxiliary lanes. Interchanges within the immediate vicinity of project are provided at Taylor Street, Hotel Circle North, and Hotel Circle South. I-8 has a posted speed limit of 65 miles per hour (mph).

Interstate 5

I-5 is a major north-south Interstate Freeway providing inter-regional connectivity between San Diego County and Orange/Los Angeles Counties to the north. Within the project area, I-5 generally consists of eight travel lanes in the north-south direction with additional auxiliary lanes. The I-8/I-5 interchange is the nearest access to the project study area. I-5 has a posted speed limit of 65 mph.

State Route 163

SR 163 is a north-south State Route providing inter-regional connectivity between downtown San Diego and Interstate 15 (I-15) to the north. Within the project area, SR 163 generally consists of eight travel lanes in the north-south direction with additional auxiliary lanes. An interchange within the immediate vicinity of the project is provided at Friars Road. The closest access to SR 163 from Riverwalk occurs at the Friars Road/SR 163 interchange, northeast of the property, or via I-8 eastbound. SR 163 has a posted speed limit of 65 mph.

Fashion Valley Road

Fashion Valley Road forms the eastern boundary of the Riverwalk site. Fashion Valley Road has an ultimate classification of Four-Lane Major Arterial in the Mission Valley Community Plan. Currently, Fashion Valley Road is a four-lane undivided roadway (Collector) between Friars Road and Hotel Circle North. While this roadway lacks any center left-turn lane or median, left-turn pockets are provided at intersections and one mid-block location, providing additional capacity. Traffic is controlled by signals except for parking lot driveways to commercial retail uses, which are controlled by stop signs. No bike lanes are provided, but bus stops are provided. Curbside parking is not permitted. The posted speed limit is 35 mph.

Hotel Circle North

Hotel Circle North forms the southern boundary of the Riverwalk project site. Hotel Circle North has an ultimate classification of a two-lane one-way couplet in the counterclockwise direction with two-way cycle track in the Mission Valley Community Plan. Hotel Circle North is currently constructed as a two-lane undivided roadway (Collector) with a two-way left-turn lane west of the I-8 ramps, a three-lane undivided roadway (Collector) between the I-8 ramps and Fashion Valley Road, and a two-lane undivided roadway (Collector) with a two-way left-turn lane between Fashion Valley Road and Camino de la Reina. Bike lanes are provided for a short distance on Hotel Circle North just west of the I-8 freeway underpass. The Hotel Circle name transition occurs underneath the I-8 freeway. The posted speed limit is 35 mph.

Friars Road

Friars Road forms the boundary between the Linda Vista and Mission Valley communities and is a classified roadway in both Community Plans. Per the Mission Valley Community Plan, Friars Road has an ultimate classification of Four-Lane Major Arterial between east of Napa Street and Fashion Valley Road, a Five-Lane Major between Fashion Valley Road and Fashion Valley Driveway, a Six-Lane Major Arterial between Fashion Valley Driveway and SR 163 SB ramps/Ulric Street, an Eight-Lane Primary Arterial between the SR 163 southbound (SB) ramps/Ulric Street and Mission Center Road and Qualcomm Way.

Bike lanes and sidewalks are provided along the roadway. The bike lanes on the north side are provided adjacent to the curbside parking between just east of Napa Street and just west of Fashion

Valley Road. Bicycle facilities on the south side include a two-way cycle track from Sea World Drive to Riverwalk's northeast boundary and a bike lane from Napa Street to east of the SR 163 overcrossing. The posted speed limit is generally 45 mph.

5.2.1.2 Transit Network

Light Rail

Regional light rail transit service in the project study area is provided by the MTS Trolley Green Line, which runs between Santee and Downtown San Diego. There are seven stations within the Mission Valley community: Mission San Diego, Qualcomm Stadium, Fenton Parkway, Rio Vista, Mission Valley Center, Hazard Center, and Fashion Valley. The stations closest to the project site are Fashion Valley, located approximately 0.3-mile east of the site, and Hazard Center, located approximately one mile east of the site. The Morena/Linda Vista Station is located in the adjacent Linda Vista community, approximately 1.3 miles west of the project site. The Green Line covers 23.6 miles, with 15-minute service Mondays through Saturdays and 30-minute service during the late evenings, weekend mornings, and Sundays. The Green Line serves a total of 27 stations.

The MTS Green Line Trolley will provide connection to the MTS Blue Line Trolley extension project (the Mid Coast project). Currently, the Mid Coast project is under construction and will provide light rail service between Old Town and the University Town Center (UTC) areas. This trolley line is expected to be operational in late 2021, which is prior to the proposed project's opening day.

As shown on Figure 5.2-1, *Existing Transit Network*, the Green Line Trolley tracks run parallel to Friars Road and the San Diego River. Within walking distance from a portion of the Riverwalk project site, the Fashion Valley Transit Center serves as a convergence point for the Green Line Trolley and seven bus routes, including Routes 6, 20, 25, 41, 88, 120, and 928. (See below for a discussion of bus service in the project area.) Access to the Fashion Valley Transit Center is provided via the local roadway network, dedicated transit center parking, the San Diego River Trail, and a pedestrian bridge crossing the San Diego River.

Bus Service

Bus service is provided by the MTS. The bus routes serving the immediate project area include MTS Routes 6, 20, 25, 41, 88, 120, and 928, and are described below:

- **Route 6** runs between Mission Valley (Fashion Valley Transit Station) to North Park (30th Street and University Avenue). The route runs along Camino de la Reina, Qualcomm Way, Texas Street, and El Cajon Boulevard to North Park. There is a total of 19 stops along this route. Weekday service begins at 6:01 AM with 15-minute headways and ends at 11:25 PM. Saturday service begins at 6:34 PM with 30-minute headways and ends at 10:25 PM. Sunday service begins at 9:37 AM with 30-minute headways and ends at 8:31 PM.

- **Route 20** is an Express Bus Service that runs from Rancho Bernardo Transit Station to Downtown San Diego. The route runs along Camino Del Norte, Interstate 15 (I-15), Carmel Mountain Road, Black Mountain Road, Kearny Villa Road, and State Route 163 (SR 163). There are 38 stops along this route, including the Fashion Valley Transit Center. Weekday service begins at 5:13 AM with 15-minute headways and ends at 10:17 PM. Saturday service begins at 5:41 AM with 30-minute headways and ends at 9:17 PM. Sunday service begins at 5:41 AM with one-hour headways and ends at 8:49 PM.
- **Route 25** runs from Fashion Valley to Kearny Mesa. The route runs along Clairemont Mesa Boulevard, Santo Road, Aero Drive, Kearny Villa Drive, Genesee Avenue, Ulric Street, and Friars Road. There is a total of 30 stops along this route including destinations to Linda Vista Park and Recreation Center, Stone Crest Plaza, and Sharp Hospital. This route runs on weekdays starting at 6:30 AM with one-hour headways and ends at 6:51 PM. No weekend service is provided.
- **Route 928** runs from Fashion Valley to Kearny Mesa. The route runs along Clairemont Mesa Boulevard, Ruffin Road, Aero Drive, Murray Ridge Road, Mission Center Road, and Friars Road. There is a total of 33 stops along this route, including destinations to Hazard Center and Stone Crest Plaza. Weekday service begins at 4:47 AM with 30-minute headways and ends at 9:24 PM. Saturday service begins at 8:30 AM with one-hour headways and ends at 6:29 PM. Sunday service begins at 6:30 AM with one-hour headways and ends at 9:27 PM.
- **Route 41** runs from Fashion Valley to University of California San Diego (UCSD). The route runs along La Jolla Village Drive, Genesee Avenue, SR 163, and Fashion Valley Road. There is a total of 34 stops, including destinations to Costa Verde Center, Fashion Valley Mall, Genesee Plaza, Mesa College, and Westfield UTC. Weekday service begins at 5:21 with 15-minute headways and ends at 11:41 PM. Weekend service is available from Fashion Valley to UTC Transit Center. Saturday service begins at 6:07 AM with 30-minute headways and ends at 10:36 PM. Sunday service begins at 6:27 AM with 30-minute headways and ends at 9:53 PM.
- **Route 88** runs from Old Town to Fashion Valley Transit Center via Hotel Circle. There is a total of 13 stops along this route. Weekday service begins at 5:55 AM with 30-minute headways and ends at 9:21 PM. Saturday service begins at 5:40 AM with 30-minute headways and ends at 8:37 PM. No Sunday service is provided.
- **Route 120** runs from Downtown (4th Avenue and Broadway) to Kearny Mesa. The route runs along Kearny Mesa Road, Linda Vista Road, Ulric Street, Friars Road, Fashion Valley Road, SR 163, and Fourth Avenue. There is a total of 32 stops along this route, including destinations to Fashion Valley Mall, Horton Plaza, Sharp and Children's Hospitals, Kearny Mesa Courthouse, and Juvenile Hall. Weekday service begins at 4:59 AM with 15-minute headways

and ends at 10:33 PM. Sunday service begins at 6:13 AM with 30-minute headways and ends at 9:59 PM.

5.2.1.3 Bicycle Network

Bicycle Facilities

Bicycle facilities can typically be classified into four general categories:

- Class I bicycle paths provide a completely separated right-of-way for the exclusive use of bicyclists, pedestrians, and those using non-motorized modes of travel. These facilities typically consist of off-street bicycle paths or trails and provide critical connections where roadways are absent or are not conducive to bicycle travel.
- Class II bicycle lanes refer to bicycle facilities defined by pavement striping and signage to allocate a portion of roadway for bicycle travel. Bicycle lanes are one-way facilities on either side of a street. A painted buffer can separate bicycles from vehicles or parking lanes and green paint can identify conflict zones.
- Class III bicycle routes are facilities where bicycles share a travel lane with automobile traffic. These facilities are identified with signage and may include other features such as “sharrow” pavement markings to delineate that the road is a shared-use facility.
- Class IV Cycle Tracks combine the experience of a separated path with the on-street infrastructure of a conventional bike lane. They are located in roadway right-of-way but separated from vehicle lanes by physical barriers, flexible posts, on-street parking curbs, or other objects.

Existing Bicycle Mobility

Figure 5.2-2, *Existing Bicycle Network*, shows the existing bicycle network within the immediate vicinity of the project site. Table 5.2-1, *Bicycle Facilities*, summarizes the existing bicycle classifications on the project’s surrounding street segments and also shows the future bicycle classifications planned for those facilities.

Existing Bicycle Activity

Existing bicycle activity (from the Mission Valley Community Plan Update, Mobility Existing Conditions Report, June 2017) was documented at every intersection in the study area during the commuter AM and PM peak hours. AM and PM bicycle activity was documented, and every intersection was categorized into the following bicycle activity categories: low activity, assuming less than five bicyclists/hour; medium activity, assuming six to nine bicyclists/hour; and high activity, assuming greater than ten bicyclists/hour.

Table 5.2-1. Bicycle Facilities

Street Segment	Existing Classification	Future Classification per Mission Valley Community Plan
Friars Road		
Napa Street to Colusa Street	Class II and Class IV ³	Class II and Class IV ²
Colusa Street to Goshen Street	Class II and Class IV ³	Class II and Class IV ²
Goshen Street to Via las Cumbres	Class II and Class IV ³	Class II and Class IV ²
Via las Cumbres to Fashion Valley Road	Class II ⁴	Class II and Class IV ²
Fashion Valley Road to Via De La Moda	Class II	Class IV ¹
Via De La Moda to Avenida De Las Tiendas	Class II	Class IV ¹
Avenida De Las Tiendas to Ulric Steet	Class II	Class IV ¹
Ulric Street to SR 163 NB Ramps	Class II	Class II
Hotel Circle North		
Hotel Circle Place to I-8 WB Ramps	Class II	Class IV ²
I-8 WB Ramps to Fashion Valley Road	None	Class IV ²
Fashion Valley Road to Camino de la Reina	None	Class IV ²
Camino de la Reina		
Hotel Circle North to Avenida del Rio	Class III	Class IV ²
Avenida del Rio to Camino de la Siesta	None	Class I/Class II
Taylor Street		
I-8 EB Ramps to Hotel Circle South	Class II	Class II
Hotel Circle South to I-8 WB Ramps	None	Class IV ²
Hotel Circle South		
Taylor Street to I-8 EB Ramps	Class III	Class IV ²
I-8 EB Ramps to Bachman Place	Class II	Class IV ²
Bachman Place to Camino de la Reina	Class II	Class IV ²
Fashion Valley Road		
Friars Road to Riverwalk Drive	Class III	Class IV ²
Riverwalk Drive to Hotel Circle North	Class III	Class IV ²

1. One-way cycle track.
2. Two-way cycle track.
3. Friars Road currently includes Class II bicycle lanes on both sides of the roadway. In addition, a Class IV two-way cycle track is provided on the south side.
4. The cycle track terminates approximately 920 feet west of Fashion Valley Road.

Figure 5.2-3, *Existing Bicycle Activity*, shows the existing bicycle activity in proximity of the project. For the project vicinity, there was medium to high bicycle activity along Friars Road, Fashion Valley Road, and Hotel Circle North. As shown on Figure 5.2-3, the following intersections were observed as having medium or high bicycle activity for locations within a 0.5-mile driving distance of the project area:

- Linda Vista Road/Via Las Cumbres
- Friars Road/Goshen Street
- Friars Road/Via De La Moda

- Friars Road/Avenida de las Tiendas
- Fashion Valley Road/Riverwalk Drive
- Camino de la Reina/Avenida Del Rio
- Hotel Circle North/I-8 WB Ramps
- Hotel Circle North/Fashion Valley Road
- Hotel Circle North/Camino de la Reina

5.2.1.4 Pedestrian Network

Existing Pedestrian Mobility

A pedestrian network inventory was conducted along street segments, which included documenting street segments, missing sidewalks, pedestrian barriers, and pedestrian pathways within the 0.5-mile driving distance of the project. Figure 5.2-4, *Existing Pedestrian Network*, shows the existing pedestrian network within the immediate vicinity of the project site.

Existing Pedestrian Activity

Existing pedestrian activity (from the Mission Valley Community Plan Update, Mobility Existing Conditions Report, June 2017) was documented at intersections within the 0.5-mile driving distance of the project during the commuter AM/PM peak hours. AM and PM pedestrian activity was documented, and every intersection was categorized into the following pedestrian activity categories: low activity, assuming less than 30 pedestrians/hour; medium activity, assuming 31 to 59 pedestrians/hour; and high activity, assuming greater than 60 pedestrians/hour.

Figure 5.2-5, *Existing Pedestrian Activity*, shows the existing pedestrian activity in proximity of the Riverwalk project. In the vicinity of the Riverwalk project site, there was medium to high pedestrian activity surrounding the Fashion Valley Transit Center and the Fashion Valley Mall, and low activity surrounding the Riverwalk Golf Course and Hotel Circle North. As shown on Figure 5.2-5, the following intersections were observed as having medium or high pedestrian activity for locations within a 0.5-mile driving distance of the project area:

- Linda Vista Road/Via Las Cumbres
- Friars Road/Colusa Street
- Friars Road/Fashion Valley Road
- Fashion Valley Road/Riverwalk Drive
- Hotel Circle South/Bachman Place

5.2.2 Regulatory Framework

5.2.2.1 State

Senate Bill 743/State CEQA Guidelines

Senate Bill (SB) 743, signed in 2013, required a change in the way that transportation impacts are analyzed under CEQA. Historically, environmental review of transportation impacts has focused on the delay vehicles experience at intersections and roadway segments, as expressed in Levels of Service (LOS). The legislation, however, sets forth that upon certification of new guidelines by the Secretary of the Natural Resources Agency, automobile delay, as described solely by LOS or other similar measures of traffic congestion *shall not be considered a significant impact on the environment*. Local jurisdictions may continue to consider LOS with regard to local general plan policies, zoning codes, conditions of approval, thresholds, and other planning requirements. New criteria for measuring traffic impacts under CEQA are to focus on *the reduction of greenhouse gas emissions, the development of multi-modal transportation networks, and a diversity of land uses*.

State CEQA Guidelines Section 15064.3 was adopted in December 2018 to implement SB 743. In addition to establishing VMT as the most appropriate measure of transportation impacts, and shifting away from LOS, primary elements of this section:

- Reiterate that a project's adverse effect on automobile delay shall not constitute a significant environmental impact;
- Create a rebuttable presumption of no significant transportation impacts for (a) land use projects within 0.5-mile of either an existing major transit stop or a stop along an existing high-quality transit corridor, (b) land use projects that reduce VMT below existing conditions, and (c) transportation projects that reduce or have no impact on VMT;
- Allow a lead agency to qualitatively evaluate VMT if existing models are not available; and
- Give lead agencies discretion to select a methodology to evaluate a project's VMT, but requires disclosure of that methodology in the CEQA documentation.

Lead agencies are required to comply with CEQA Guideline revisions no later than July 1, 2020. To assist lead agencies in this endeavor, the State Office of Planning and Research (OPR) has also published a Technical Advisory on Evaluating Transportation Impacts in CEQA (December 2018), which provides guidance in the calculation and application of VMT analyses within CEQA documents. The City is still developing its VMT methodology and therefore currently adheres to its adopted thresholds and methodology. The City plans to meet the July 1, 2020, deadline for VMT metric adoption.

Where the case-by-case setting and circumstances of a particular project make it appropriate to use a VMT threshold, the City may evaluate a project under a project-specific threshold. A project-

specific VMT-based threshold was used for this project. The methodology for this threshold is described below in Section 5.2.3, *Methodology*.

5.2.2.2 Regional

San Diego Forward: The Regional Plan

San Diego Forward: The Regional Plan (RP) is an update of the Regional Comprehensive Plan (RCP) for the San Diego Region and the 2050 RP/Sustainable Communities Strategy (SCS), combined into one document. The Regional Plan provides a blueprint for San Diego's regional transportation system in order to effectively serve existing and projected workers and residents within the San Diego region. In addition to long-term projections, the Regional Plan includes an SCS, in compliance with SB 375. The SCS aims to create sustainable, mixed-use communities conducive to public transit, walking, and biking by focusing future growth in the previously developed, western portion of the region along the major existing transit and transportation corridors. The Regional Plan has a horizon year of 2050, projects regional growth, and contains recommended transportation projects over this time period.

TPAs, in general, include areas within a 0.5-mile radius of an existing major transit station or stop along an existing high-quality transit corridor. The SANDAG 2050 RP identifies transit's expanding role to meet local and regional mobility needs. Targets have been set in the City's CAP to increase transit mode share within TPAs. The Riverwalk project is located within both a City of San Diego 2035 TPA and SANDAG-identified TPA.

5.2.2.3 Local

General Plan

The General Plan's Mobility Element identifies the proposed transportation network and strategies needed to support the anticipated General Plan land uses. The Mobility Element's policies promote a balanced, multi-modal transportation network that gets people where they want to go while minimizing environmental and neighborhood impacts. The Mobility Element contains policies that address walking, streets, transit, regional collaboration, bicycling, parking, the movement of goods, and other components of a transportation system. Together, these policies advance a strategy for relieving congestion and increasing transportation choices.

Mission Valley Community Plan

The project site is located within the Mission Valley Community Plan area. The Mission Valley Community Plan promotes the development of Mission Valley into a *walkable, accessible community envisioned in the General Plan's City of Villages Strategy through the building of multi-modal connections that ensure Mission Valley remains positioned for sustainable growth*. The Mission Valley Community Plan's Mobility Element is also aimed at developments that include: accessibility to cyclists and

amenities to support bicycle use; technology solutions that can improve mobility; contributions to a better functioning street system; elements that promote internal walkability as well as connectivity to and from other destinations in the community; and transit-oriented features that promote transit use.

5.2.3 Methodology

5.2.3.1 Background on Senate Bill 743

In conformance with SB 743, the project's vehicular impacts were evaluated using a VMT metric, pursuant to the latest direction from the OPR Technical Advisory, and other local and regional documents helpful in providing substantial evidence to support a VMT threshold and impact analysis. Public Resources Code Section 21099, enacted pursuant to SB 743, identifies VMT as an appropriate metric for measuring transportation impacts along with the elimination of auto delay/LOS for CEQA purposes statewide prior to July 1, 2020. The justification for this paradigm shift is that auto delay/LOS impacts may lead to improvements that increase roadway capacity and, therefore, sometimes induce more traffic and greenhouse gas emissions. In contrast, constructing projects in VMT-efficient locations assists California in meeting greenhouse gas emissions targets.

In January 2016, the OPR issued Draft Guidance, which provided recommendations for updating the State's CEQA Guidelines in response to SB 743 and recommended options for conducting VMT analysis. When using a threshold of significance, a lead agency may *consider the thresholds of significance recommended by experts and supported by substantial evidence* (CEQA Guidelines 15064.7(c)). In addition, lead agencies may use thresholds on a project-by-project or a case-by-case basis not for general use where, based on careful judgment, project setting, and to the extent possible on scientific and factual data, the lead agency explains how compliance with the threshold means that the project's impacts are less than significant.

5.2.3.2 Riverwalk Project-Specific Analysis

Riverwalk's setting and circumstances are unique because, within months of the July 1, 2020, statutory deadline for all lead agencies statewide to switch to a VMT-based significance threshold, Riverwalk is anticipated to process entitlements and CEQA analysis that proposes to construct a major transit facility as part of a large specific plan project that would provide service to the existing community and future residents and employees living and working in the project's proposed homes and office space. Given the facts about this unique project feature and the policy benefits of encouraging investment in such VMT-reducing transit features that meet the goals of SB 743, a project-specific VMT-based threshold is the appropriate threshold to apply to the project. Where the case-by-case setting and circumstances of a particular project make it appropriate to use a VMT threshold, the City may evaluate a project under a project-specific threshold.

In addition to the VMT analysis, a project-specific Mobility Assessment (MA) was also prepared and is included as Appendix C1 to this document. This assessment focuses on automobile delay/LOS within the Mission Valley Community Plan area. The LOS analysis was conducted to identify the project traffic's effect and recommends project improvements to ensure that the project is consistent with the Mission Valley Community Plan transportation improvements and that improvements would be implemented by the project consistent with the Transportation Improvement Plan (TIP). However, consistent with SB 743 and CEQA Guidelines 15064.3, the CEQA significance determination for this project is suggested to be based only on VMT and not on LOS.

5.2.3.3 Trip Generation

The project includes land uses (such as retail, residential, and office) that promote interaction between the on-site land uses. In addition, the project site is located in a 2035 TPA and would have two trolley stations within close walking distance: the existing Fashion Valley Transit Center and the proposed on-site Riverwalk trolley stop. Mixed-use developments near high-quality transit (such as the trolley) typically generate fewer vehicle trips as compared to conventional suburban developments due to the synergy of land uses and increased activity of transit, pedestrian, and bicycle trips.

Given the intensity and density of land uses proposed, the project would be developed in a phased manner and includes three phases, with ultimate buildout of the Specific Plan anticipated in 2035. The phases include Opening Day (Phase I) in 2025, Phase II in 2030, and Phase III in Year 2035. Table 5.2-2, *Project Phasing*, and Figure 3-11, *Riverwalk Phasing Plan*, summarize the three phases of the project.

Phase I of the project is calculated to generate 14,932 net new cumulative average daily trips (ADT) with 1,024 total AM peak hour trips (329 inbound/695 outbound) and 1,448 total PM peak hour trips (871 inbound/577 outbound). Phase I of the project is calculated to generate 17,248 driveway ADT with 1,094 total AM peak hour trips (371 inbound/723 outbound) and 1,680 total PM peak hour trips (987 inbound/693 outbound).

Phase II of the project is calculated to generate 28,305 net new cumulative ADT with 1,988 total AM peak hour trips (528 inbound/1,460 outbound) and 2,627 total PM peak hour trips (1,682 inbound/945 outbound). Phase II of the project is calculated to generate 30,896 driveway ADT with 2,066 total AM peak hour trips (575 inbound/1,491 outbound) and 2,886 total PM peak hour trips (1,811 inbound/1,075 outbound).

Table 5.2-2. Project Phasing

Phase	Year	Development Activity
I	2025	1,910 multi-family dwelling units; 110,300 sf Retail; 65,000 sf multi-tenant office; 1.6-acre Developed Park; 3.11-acre Undeveloped Park
II	2030	2,390 multi-family dwelling units; 13,100 sf Retail; construction of the Riverwalk trolley station; 26.27-acre Developed Park; 53.48-acre Undeveloped Park (including the Riverwalk River Park)
III	2035	28,600 sf Retail; 935,000 sf multi-tenant office; 2.2-acre Undeveloped Park
Project Buildout		<ul style="list-style-type: none"> • 4,300 multi-family dwelling units • 152,000 sf Retail • 1,000,000 sf Office • 27.87-acre Developed Park^b • 58.79-acre Undeveloped Park^c • 28 acres Open Space^d

Footnotes:

- Park acreage changes are due to changes in the project description and site plan that were made to ensure consistency with the Mission Valley Community Plan (MVCP) Preferred Roadway Network, including Irrevocable Offer of Dedications (IODs) for Streets J and U. Additionally, a 50-foot no-use buffer surrounding the SD River and MHPA has been subtracted from previous Undeveloped Park acreage.
- The total acreage for Developed parks used in the trip generation calculations from an earlier project description equals 27.87 acres. Per the current project description, the total Developed Parks acreage is 20 acres (Phase I: 0.9 acres and Phase II: 19.1 acres) including a recreation center identified in the Mission Valley Community Plan. However, to be conservative, the 27.87 acres was used in the trip generation calculations.
- The total acreage for Undeveloped Parks used in the trip generation calculations from an earlier project description equals 58.79 acres. Per the current project description, the total Undeveloped Parks acreage is 42.3 acres (Phase I: 2.4 acres and Phase II: 39.9 acres). However, to be conservative, the 58.79 acres was used in the trip generation calculations.
- The total acreage for Open Space from an earlier project description totals 28 acres. Per the current project description, the total Open Space acreage is 35 acres.

Project buildout (Phases I, II, and III) is calculated to generate 37,222 net new cumulative ADT with 3,105 total AM peak hour trips (1,519 inbound/1,586 outbound) and 3,906 total PM peak hour trips (1,973 inbound/1,933 outbound). Project buildout is calculated to generate 41,186 driveway ADT with 3,224 total AM peak hour trips (1,591 inbound/1,633 outbound) and 4,302 total PM peak hour trips (2,171 inbound/2,131 outbound).

To ensure consistency with the Mission Valley Community Plan and to provide improvements necessitated by the project, public streets, private drives, streetscape enhancement, bicycle improvements, and pedestrian improvements associated with each phase of development would be constructed as discussed in the TIP included as an appendix to the TIA. This would ensure that the appropriate transportation improvements would be provided as the project develops over an extended period of time.

5.2.4 Impact Analysis

5.2.4.1 Issue 1

Issue 1: Would the project conflict with an adopted program, plan, ordinance, or policy addressing the transportation system, including transit, roadways, bicycle, and pedestrian facilities?

Impact Threshold

According to the City's Significance Determination Thresholds, transportation impacts may be significant if a project would *conflict with adopted policies, plans, or programs supporting alternative transportation modes (e.g., bus turnouts, bicycle racks)*. A significant transportation impact could occur if the proposed project would conflict with the General Plan Mobility Element or other adopted transportation programs, plans, ordinances, or policies such as the City's Bicycle Master Plan.

Analysis

The project would be consistent with the Mobility Element of the General Plan (as previously demonstrated in Table 5.1-1) and other adopted policies, plans (including the Mission Valley Community Plan, as previously demonstrated in Table 5.1-3), or programs supporting the transportation system, as it strives to improve mobility through a balanced, multi-modal transportation network with planned improvements to pedestrian, bicycle, and transit facilities.

Alternative Transportation Improvements

Pedestrian Facilities

The project proposes substantial improvements to promote walkability. Figure 5.2-6, *Pedestrian Network - Project Frontage*, shows the proposed pedestrian network along the project frontage. Figure 3-4, *Pedestrian Circulation*, shows the proposed pedestrian circulation within the project site. The project would construct the following on the fronting streets as well as within the project site:

- A six-foot wide non-contiguous sidewalk would be constructed along the entire project frontage on the south side of Friars Road. The sidewalk would be separated from the curb by a 17-foot-wide landscaped buffer to provide refuge for pedestrians.
- Currently, a five-foot wide contiguous sidewalk exists only on the east side of Fashion Valley Road between Friars Road and Hotel Circle North. An existing five-foot wide contiguous sidewalk on the west side of Fashion Valley Road is provided for approximately 620 feet between Friars Road and proposed Private Drive 'T'. The project would widen Fashion Valley Road and construct a six-foot wide non-contiguous sidewalk on the west side of Fashion Valley Road along the entire project frontage between proposed Private Drive 'T' and Hotel Circle North. This would enhance pedestrian mobility and interaction between the Fashion Valley mall and surrounding community.

- Currently, there are no sidewalks on Riverwalk Drive, west of Fashion Valley Road. The project would construct a seven-foot wide non-contiguous sidewalk along the south side of Riverwalk Drive between Fashion Valley Road to its on-site terminus.
- A seven-foot wide non-contiguous sidewalk would be constructed along the 840-foot project frontage on the north side of Hotel Circle North. The sidewalk would be separated by a seven-foot-wide landscaped buffer to provide refuge for pedestrians.
- The San Diego River Pathway (Class I pedestrian/bicycle path) would be constructed on the north side of the San Diego River in the project's Central District and would connect with the existing San Diego River Pathway to the east and west of the Riverwalk site.
- A Class I pedestrian/bicycle path would utilize the two existing bridges along the San Diego River to provide a pedestrian link from the transportation center and urban core to the southern portions of Riverwalk and also to activate the Riverwalk River Park. Paths would connect the pedestrian bridges to the San Diego River Pathway, the various elements of the park system, and pedestrian/bicycle linkages to the development areas on both sides of the San Diego River. In addition to the two existing bridges over the San Diego River, a new pedestrian bridge is proposed on Street 'J', north of Street 'P', connecting to the proposed Riverwalk trolley stop / transit station.
- Sidewalks would also connect to the community-wide pedestrian network. An existing golf cart tunnel would be utilized for pedestrian and bicycle access from the north to the south side of the trolley tracks. An additional existing golf cart tunnel on the west side of the Riverwalk site would provide pedestrian connection under the trolley tracks to any future development at the 15-acre MTS-owned parcel.
- With the exception of the north side of Riverwalk Drive fronting the trolley tracks, all on-site roadways would include sidewalks on both sides of the roadway and crosswalks on all approaches.
- A seven-foot-wide open space/walkway for pedestrians is also proposed on the north side of the trolley tracks to provide pedestrian access to and from Fashion Valley Road to the west end of the project site.

All proposed pedestrian design and mobility elements, including sidewalks and pathways, linkages, crossings and intersections, and curb pop-outs or extensions would be required to comply with the City's design standards, satisfactory to the City Engineer.

Bicycle Network

To promote bicycle mobility, the project proposes to construct several bicycle improvements along all the major project fronting corridors of Friars Road, Fashion Valley Road, Hotel Circle North, and Riverwalk Drive, consistent with the Mission Valley Community Plan Bicycle Network shown in Table 5.2-1, as well as bicycle facilities within the project site. Figure 3-6, *Bicycle Circulation Plan*, shows the proposed on-site bicycle circulation. Improvements to the bicycle network are described below:

- *Friars Road*: A Class IV cycle track is proposed on Friars Road between Colusa Street and Street M. The existing Class II buffered bike lanes on both sides of Friars Road between Colusa Street and Fashion Valley Road would remain.
- *Fashion Valley Road*: Consistent with the Mission Valley Community Plan Bicycle Plan, the project would construct a two-way Class IV cycle track on the west side of Fashion Valley Road between Riverwalk Drive and Hotel Circle North along the project frontage, and a southbound Class II bike lane between Private Drive 'T' and Riverwalk Drive. A Class III bike route would be designated southbound along Fashion Valley Road for portions that are not along the Riverwalk project frontage (which is approximately 660 ft).
- *Hotel Circle North*: Currently, Hotel Circle North along the project frontage includes no bike lanes. Consistent with the Mission Valley Community Plan Bicycle Plan, the project would construct a two-way Class IV cycle track on the north side of Hotel Circle North between Fashion Valley Road and I-8 westbound ramps. This assumes a one-way couplet is implemented on Hotel Circle North and Hotel Circle South, per the Mission Valley Community Plan.
- *Street 'U'*: Consistent with the Mission Valley Community Plan, the project would construct a two-way Class IV cycle track on the north side of Street 'U' between Fashion Valley Road and Street 'V'.
- *Street 'V'*: The project would construct buffered Class II bike lanes on Street 'V' between Hotel Circle North and Street 'U'.
- *Street 'F'*, which is one of the major project driveways off Friars Road, would include buffered Class II bike lanes on both sides. This would ensure bicycle connectivity from the major arterial, Friars Road, into the Riverwalk project site.
- *Street 'I'*, the primary project driveway off Friars Road that would serve the Riverwalk transit stop, would include buffered Class II bike lanes on both sides. This would ensure a direct bike connection between the major arterial and the Riverwalk trolley stop/transit station.
- *Streets 'D' and 'E'*, the east-west on-site roads that parallel Friars Road and Riverwalk Drive, would include Class II bike lanes between Street 'A' and Street 'M'.
- *Street 'M'*, the easterly project driveway, would include buffered Class II bike lanes on both sides. This provides a north-south connection on the Riverwalk project site to connect to the northerly Class I San Diego River Pathway.
- The *north-south linear park space (Lot II and Lot JJ)* would include a Class I bike path on the west side of the linear park. This design allows only pedestrian and bicycle travel; no vehicular traffic is allowed.
- The project also proposes a *Class I San Diego River Pathway*, which is designed on the north of the San Diego River in the Central District. The San Diego River Pathway connects to Riverwalk Drive at the east and would connect to future western segments, as future projects develop to complete the connection to Mission Bay/Ocean Beach.
- A Class I bicycle path is also proposed for the linear park space (Lots II and JJ) connecting Friars Road to the San Diego River Pathway, located on the north side of the San Diego River. This bicycle path would provide street access to the San Diego River with a tunnel under the

trolley tracks. In addition to the San Diego River Pathway, located on the north side of the San Diego River, two additional Class I bicycle paths are proposed south of the River (as shown on Figure 3-6). One proposed Class I bicycle path would run through the Riverwalk River Park between the existing bridges; the other would connect Fashion Valley Road to the Riverwalk River Park along the northern boundary of the South District.

- On the western edge of the project site, a north-south Class I path is proposed to connect Friars Road to Street 'D'. A second east-west Class I path is proposed at the northwest corner of Fashion Valley Road and Riverwalk Drive to provide bicycle connectivity between Friars Road and Fashion Valley Road and would provide connection to the Class I San Diego River Pathway.

Bicycle facilities would link employment, residential, retail, and open space areas within Riverwalk, as well as to the community-wide bikeway system. Because bicycle facilities would connect with the City-wide system, a cyclist would be able to ride through and then beyond Riverwalk.

Transit Services

Figure 5.2-7, *Proximity to Transit per SB 743*, shows the project's proximity to transit, major and high-quality transit service, and identifies the overall TPA for the project site. As shown on Figure 5.2-7, the project would construct a new Green Line Trolley stop within the project site to promote transit mobility for all site users as well as residents in the neighboring communities. The new trolley stop is proposed to be located at the intersection of Street 'J' and Riverwalk Drive. This location was identified based on MTS criteria relative to the separation between existing stations, potential population served, flatness, and visibility.

The trolley stop would serve as a mobility hub for the project and community and provide access to and from the trolley, and paths, trails, and sidewalks that serve the neighborhood and the region. The facility would include bicycle lockers, bicycle racks and rentals, automobile drop-off and pickup, and rideshare. The trolley stop also proposes a potential location for a bus stop along Riverwalk drive to south of the trolley station, should MTS determine that bus service internal to Riverwalk is warranted in the future. The transit stop would be architecturally and functionally integrated into the design of the community. The trolley stop is part of the 2050 RP and would be constructed entirely by the Riverwalk project. Furthermore, the Riverwalk project site is located within a 2035 City of San Diego TPA map.

In addition, the project would conduct the following trolley access improvements:

- Coordinate with SANDAG, City of San Diego, and MTS to review opportunities to incorporate Transit Signal Priority system as part of the Intelligent Transportation System improvements to reduce travel times and increase efficiency for the MTS buses along Fashion Valley Road and Hotel Circle North.

- As part of the project frontage improvements, the existing bus stop at Fashion Valley Road/Hotel Circle North, the project would add a shelter, trash receptacle, maps/wayfinding signs, and lighting.
- Coordinate with SANDAG and MTS on the accommodation for future MTS buses on the project site as a part of the future Riverwalk transit stop.

Consistency with Adopted Alternative Transportation Mode Plans and Policies

Alternative transportation mode plans and policies in the vicinity of the project are governed by the City's General Plan and SANDAG's Regional Plan. Specifically, the project would be consistent with the City's Mobility Element, which supports multi-modal transportation, and the Urban Design Element, which supports integrating transit facilities into project design, and improvements to walkability, bicycling, and transit integration. Refer to Section 5.1, *Land Use*, of this EIR and Table 5.1-1 for details on plan consistency.

Significance of Impacts

The project would be consistent with the Mobility Element of the General Plan and other adopted policies, plans (including the Mission Valley Community Plan), or programs supporting the transportation system, including pedestrian, bicycle, and transit facilities. The project design includes improvements which would enhance existing bicycle and pedestrian transportation modes on the site and facilitate access to and use of public transit. All transportation facilities would be designed in accordance with applicable City standards. As a result, the project would be consistent with the City's alternative transportation policies. No significant impacts would occur.

5.2.4.2 Issue 2

Issue 2: Would the project result in Vehicle Miles Traveled (VMT) exceeding thresholds identified in the City of San Diego Transportation Study Manual?

Impact Threshold

While the transportation significance thresholds are consistent with the ones listed in the environmental checklist in Appendix G of the CEQA Guidelines, they have been revised to address the changes being implemented as a result of SB 743. The applicable thresholds used to determine whether implementing the proposed project would result in a significant impact on transportation and circulation are described below.

The transportation impacts for a large mixed-use project would be less than significant if it satisfies any one of the following criteria:

- Consistent with the presumption of less than significant impact in CEQA Guidelines 15064.3(b)(1), the project is proposed within 0.5-mile of either an existing major transit stop or a stop along an existing high-quality transit corridor; or
- Consistent with the presumption of less than significant impact in CEQA Guidelines 15064.3(b)(1), the project decreases VMT in the project area compared to existing condition; or
- Consistent with the OPR Technical Advisory, the proposed project's resident VMT per capita is at least 15 percent below the San Diego average regional resident VMT per capita and the proposed project's employee VMT per employee is at least 15 percent below the San Diego regional average VMT per employee.

A screening threshold is identified as one that presumes a project to have a less than significant impact to the transportation system and, therefore, would not be required to conduct additional VMT analysis. Additionally, Section 21099 of the PRC states that the criteria for determining the significance of transportation impacts must promote: (1) reduction of greenhouse gas emissions; (2) development of multimodal transportation networks; and (3) a diversity of land uses.

Analysis

A VMT analysis was conducted to determine the project's resident VMT per capita and project's VMT per employee in relation to the Regional Average VMT/Capita and Regional VMT/Employee, respectively.

Proximity to Transit

The methodology for determining if the proposed project is within 0.5-mile of either an existing major transit stop or along an existing high-quality transit corridor is to identify the location of existing major transit stops and high-quality transit corridors in the project vicinity and measure the distance to the project boundary. A major transit stop refers to a site containing an existing rail transit station, a ferry terminal served by either a bus or rail transit service, or the intersection of two or more major bus routes with a frequency of service interval of 15 minutes or less during the morning and afternoon peak commute periods. A high-quality transit corridor refers to a corridor with fixed-route bus service with service intervals no longer than 15 minutes during peak commute hours.

The closest transit center within the project's vicinity is the Fashion Valley Transit Center, which is an existing major transit stop located within 0.5-mile of the eastern portion of the project, as it includes a trolley stop and four bus routes with 15-minute headways during the peak commute periods. The following roadways were identified as having high-quality transit corridors as they include fixed-route bus service with 15-minute headways or less during the peak commute periods of 7:00 AM to 9:00 AM and 4:00 PM to 6:00 PM within the TPA (within 0.5-mile of these stops):

- Friars Road between Fashion Valley Road and SR 163
- Fashion Valley Road between Friars Road and Hotel Circle North
- Hotel Circle South between Camino De La Reina and I-8 eastbound ramps
- Camino De La Reina, east of Avenida Del Rio

As shown on Figure 5.2-7, the project vicinity has one major transit stop at the Fashion Valley Transit Center (with a second major transit stop proposed by the project), and six stops along high-quality transit corridors served by four fixed-route bus service lines. The project is well served by transit given its close proximity to transit to an existing high-quality transit corridor on Fashion Valley Road, an existing major transit stop at Fashion Valley Transit Center.

In addition, the project proposes to construct a new trolley station/transit center within the Specific Plan area that would be considered a major transit stop. The new trolley station/transit center is proposed to be constructed during Phase II of the project, or when the project is at 3,386 Equivalent Dwelling Units (EDU), and would be located at the intersection of Street 'J' and Riverwalk Drive. Figure 3-8, *Vehicular Circulation Plan*, shows the location of the proposed trolley stop/transit center.

Reduction in VMT

The TIA prepared for the project includes information to demonstrate that the project's residential VMT per capita and employee VMT per employee is expected to be at least 15 percent below regional average residential VMT per capita (17.6 VMT) and regional average VMT per employee (25.9 VMT), respectively. The methodology for determining whether the project's resident VMT per capita is at least 15 percent below the San Diego regional average resident VMT per capita and the proposed project's employee VMT per employee is at least 15 percent below the San Diego regional average VMT per employee is described in the TIA (Appendix D).

In addition, VMT information was extracted from the recently adopted SANDAG Series 13 Mission Valley Community Plan Travel Demand Model. Project-specific VMT information was extracted for the project Master Geographical Reference Area (MGRA) from the Year 2050 scenario, which assumes buildout of the Community Plan, including Phases I-III of the Riverwalk project. Table 5.2-3, *Project VMT Findings*, summarizes daily resident VMT per capita and employee VMT per employee for both the region and the proposed project.

Table 5.2-3. Project VMT Findings

Scenario	Regional Baseline (miles)	Significance Threshold (85% of Regional Baseline)	Riverwalk Project VMT (miles)	Transportation Impact?
Resident VMT per capita	17.6	14.96	9.9	No
VMT per Employee	25.9	22.01	19.57	No

As shown in Table 5.2-3, the project's Resident VMT per capita and the project's VMT per Employee is calculated to be at least 15 percent below the San Diego regional average Resident VMT/Capita and

VT/Employee averages, respectively. Achieving 15 percent lower per capita (residential) or per employee (office) VMT than existing development is both generally achievable and is supported by evidence that connects this level of reduction to the State's emissions goals. Therefore, based on the suggested significance criteria, the Riverwalk project VMT is calculated to result in a less than significant impact.

Significance of Impacts

Portions of the project would be located within 0.5-mile of an existing major transit station or stop and an existing high-quality transit corridor.

In addition, the project residential daily VMT per capita (Resident VMT/Capita) and daily VMT per employee (VMT/Employee) would not exceed the 15 percent threshold below the San Diego regional average baseline VMT per capita and VMT/employee for residents and employees, respectively. Based on the suggested project-specific VMT significance thresholds, there is no significant project transportation impact demonstrated under CEQA.

Mitigation Measures

Mitigation would not be required.

5.2.4.3 Issue 3

Issue 3: Would the project substantially increase hazards due to a design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?

Impact Threshold

According to the City's Significance Determination Thresholds, transportation impacts may be significant *if a project would increase traffic hazards to motor vehicles, bicyclists, or pedestrians due to proposed non-standard design features.*

Analysis

Traffic Hazard Impacts

As described above in Section 5.2.3.2, the project would include improvements to facilitate the movement of motorists, bicyclists, and pedestrians within the site and would provide connections to the surrounding areas. All transportation facilities would be designed in accordance with applicable City standards. The project does not propose non-standard design features and is not expected to increase traffic hazards to motor vehicles, bicyclists, or pedestrians.

Significance of Impacts

Because the project does not propose non-standard design features and is not expected to increase traffic hazards to motor vehicles, bicyclists, or pedestrians, impacts related to the increase of traffic hazards as a result of the project would be less than significant.

Mitigation Measures

Mitigation would not be required.

5.2.4.4 Issue 4

Issue 4: Would the project result in inadequate emergency access?

Impact Threshold

According to Appendix G of the CEQA Guidelines, transportation impacts may be significant if a project would *result in inadequate emergency access*.

Analysis

As discussed in Section 5.16, *Health and Safety*, adequate emergency access exists to the site today. Emergency response times to all portions of the site are adequate under existing conditions. Public safety facilities (e.g., Fire and Police) are located both north and south of the project as shown in Section 5.16. The project includes improvements to Fashion Valley Road, which would be beneficial during times of emergencies and if evacuation is needed. Specifically, a portion of Fashion Valley Road would be widened and raised to accommodate larger (10- to 15-year) storm events. These improvements would benefit emergency response and evacuation procedures by facilitating improved north-south vehicular connection in storm events. The project would provide adequate emergency access within the site, as well. Access for emergency vehicles would be provided at the main project entries along Friars Road, Fashion Valley Road, and Hotel Circle North. Additional emergency requirements, such as fire hydrants, fire hydrant markers (i.e., blue reflectors installed in the roadway), adequate vertical clearances, adequate turning radii, and fire ladder clearances, would be provided in accordance with City requirements. Emergency response to events in and around the San Diego River would be provided by two emergency vehicle only access points next to existing pedestrian bridges within the Riverwalk River Park. In addition, the signalized main access driveway would be equipped with signal pre-emption devices to assist emergency vehicles. Refer to Section 5.16, *Health and Safety*, of this EIR for additional discussion of emergency access and evacuation routes.

Significance of Impacts

Project improvements would contribute to emergency access. The project would be designed in accordance with applicable safety standards. The project would not result in inadequate emergency access. Impacts would be less than significant.

Mitigation Measures

Mitigation would not be required.

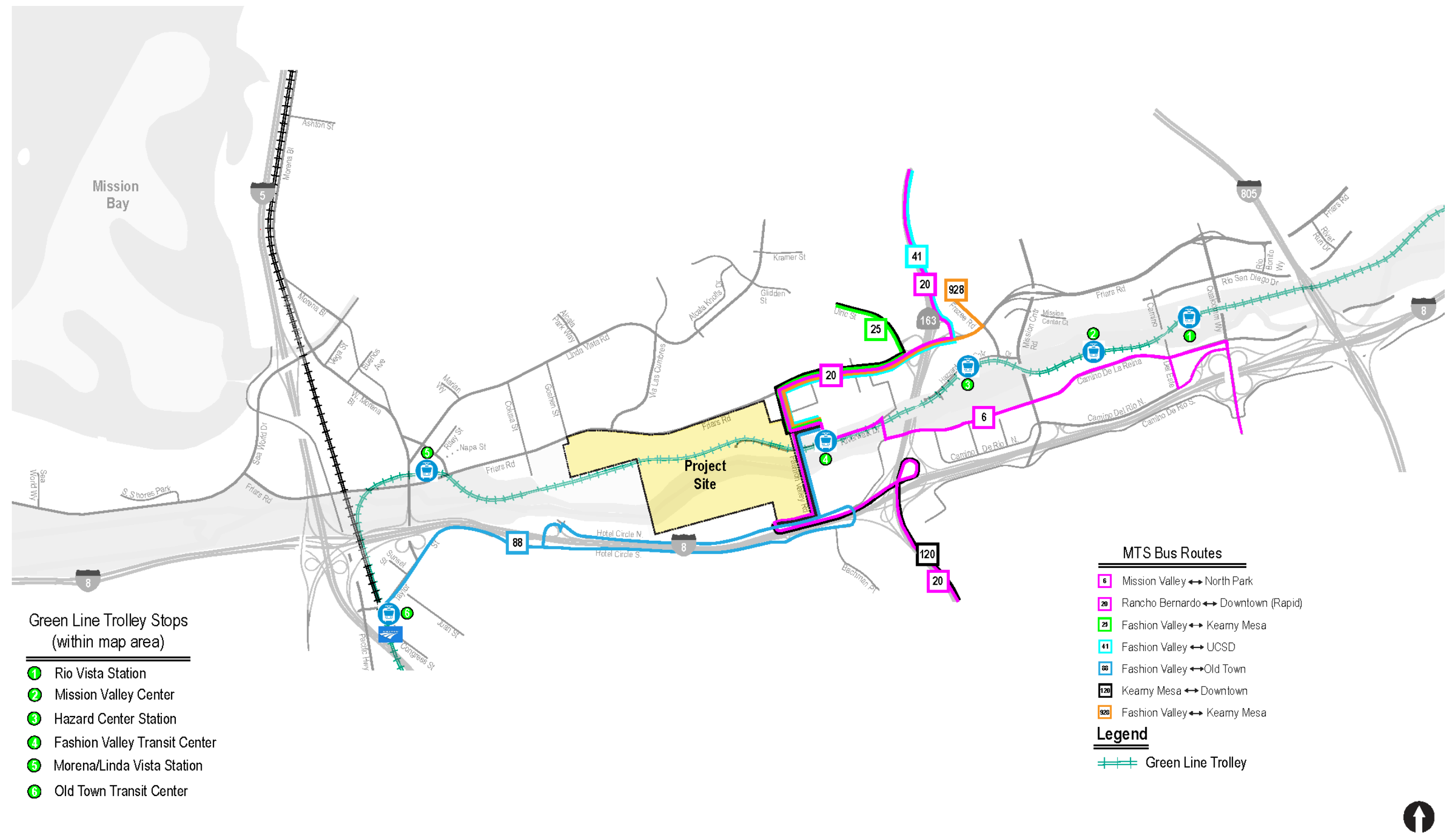


Figure 5.2-1. Existing Transit Network

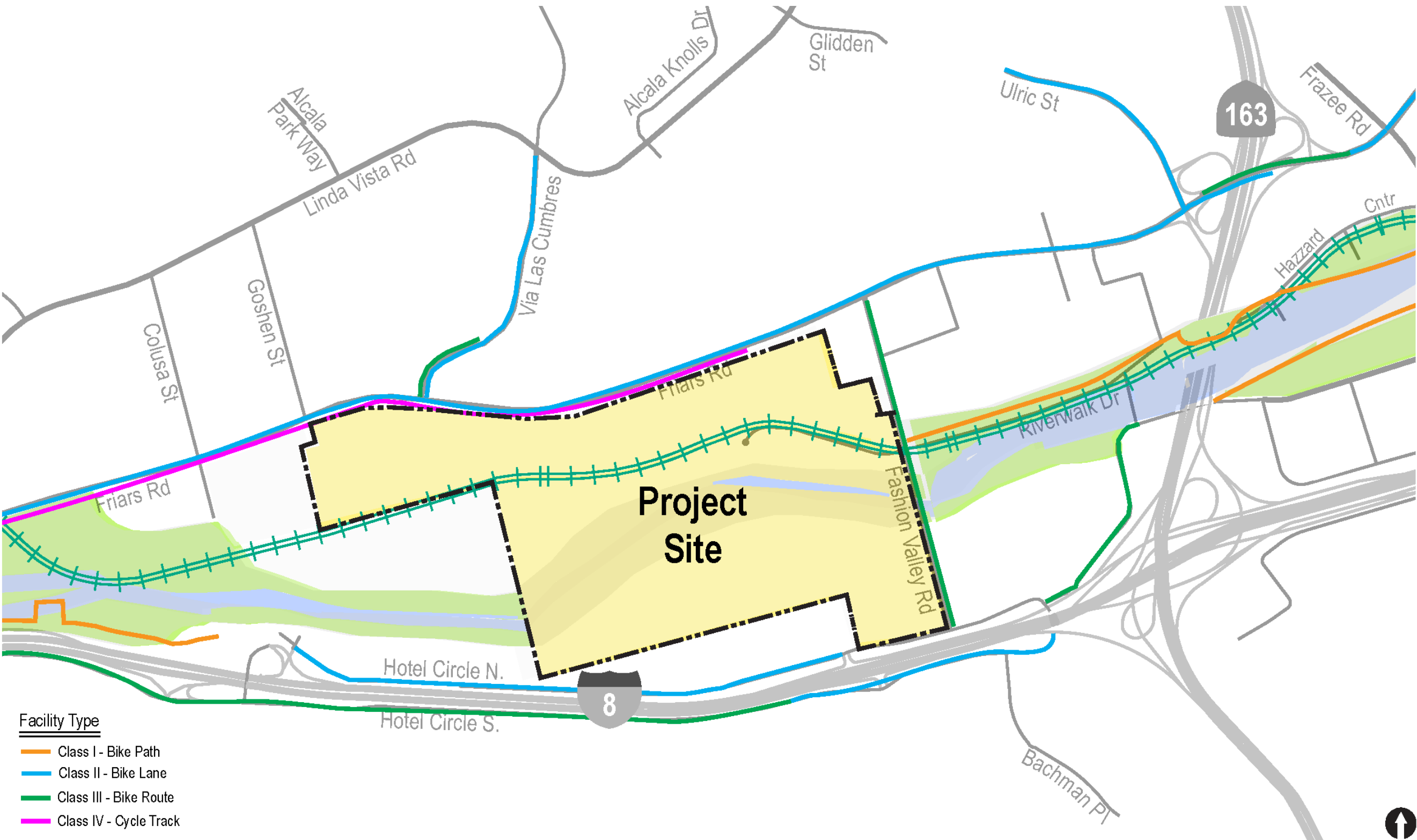


Figure 5.2-2. Existing Bicycle Network

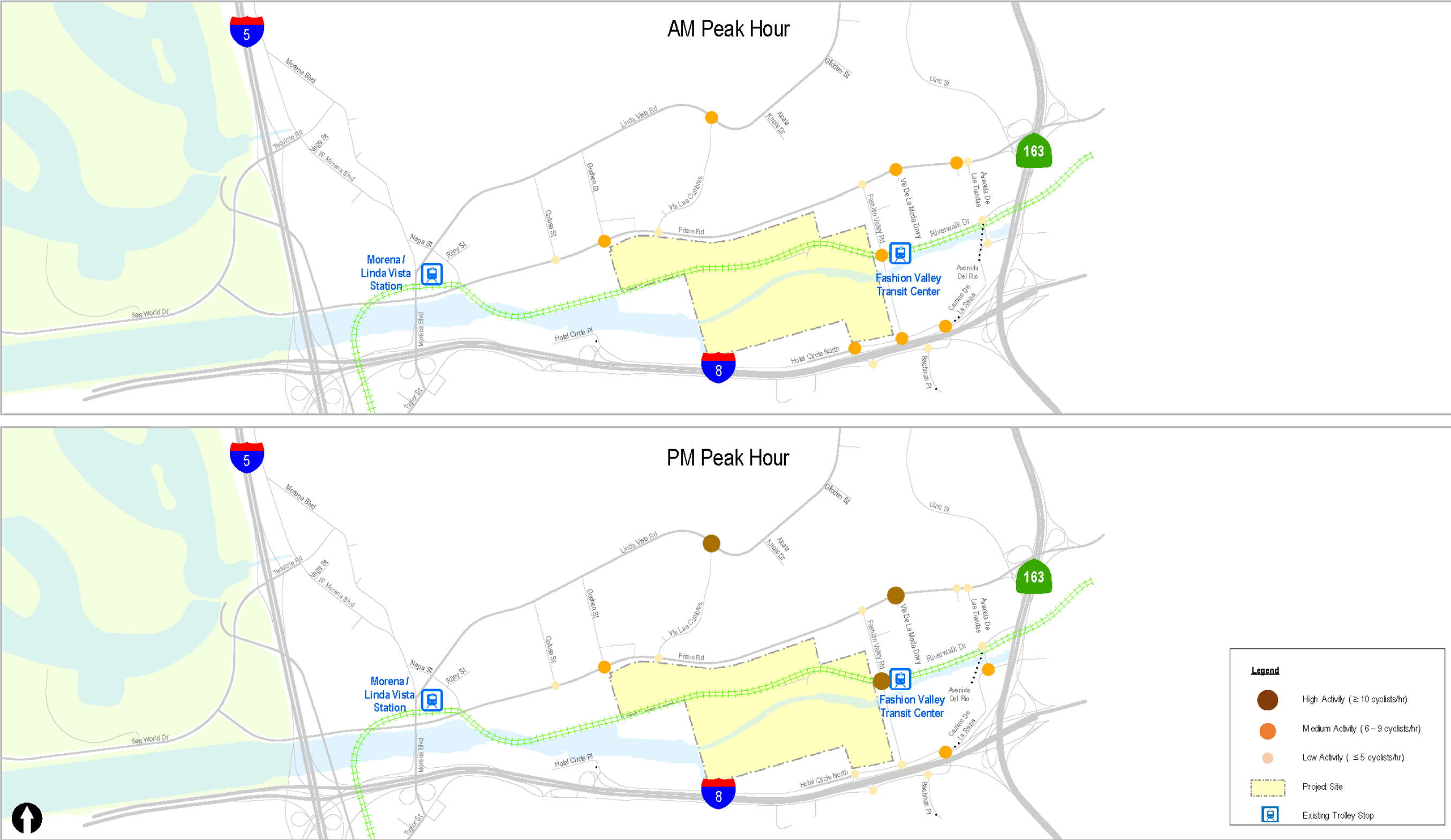


Figure 5.2-3. Existing Bicycle Activity

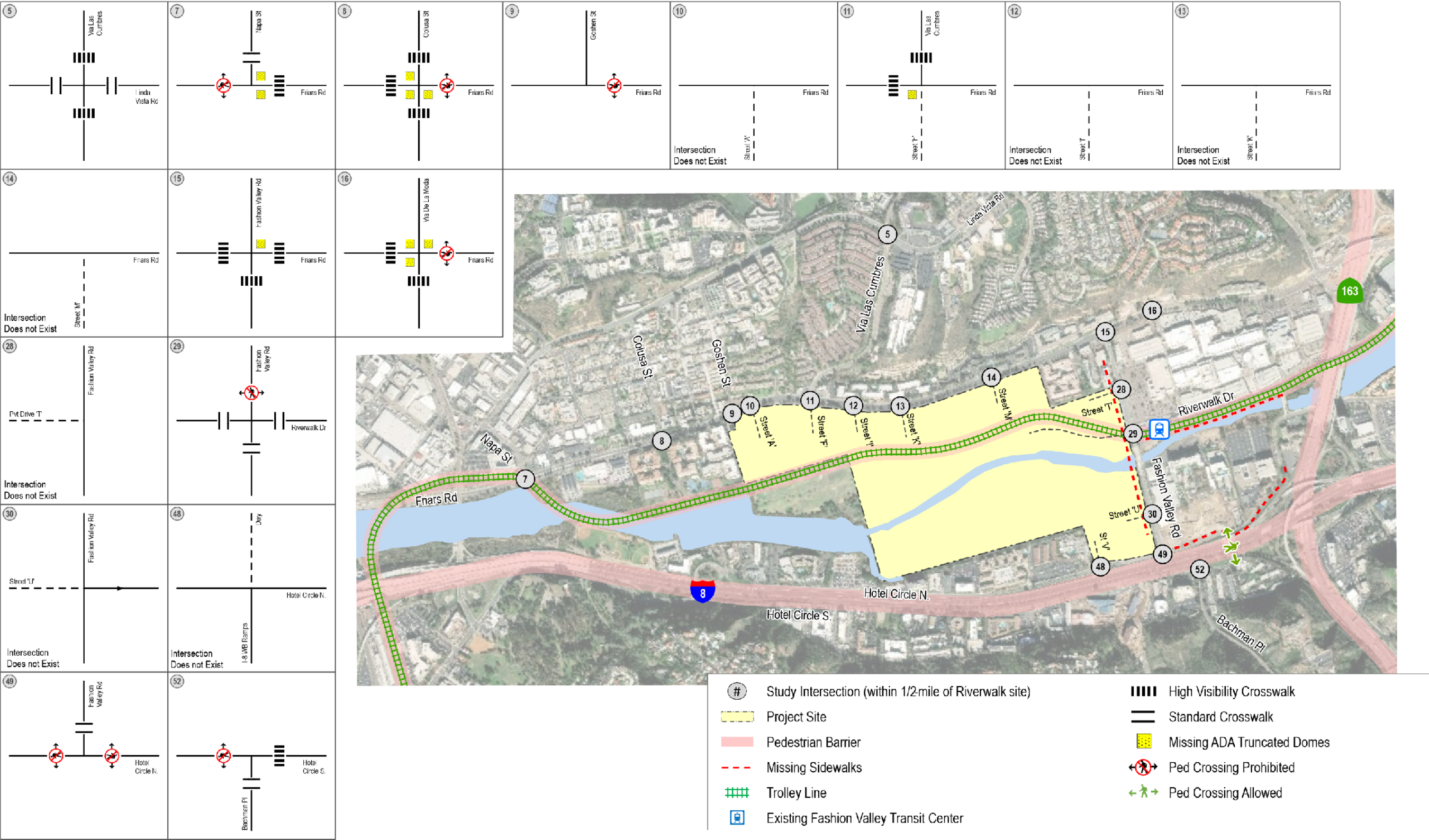


Figure 5.2-4. Existing Pedestrian Network

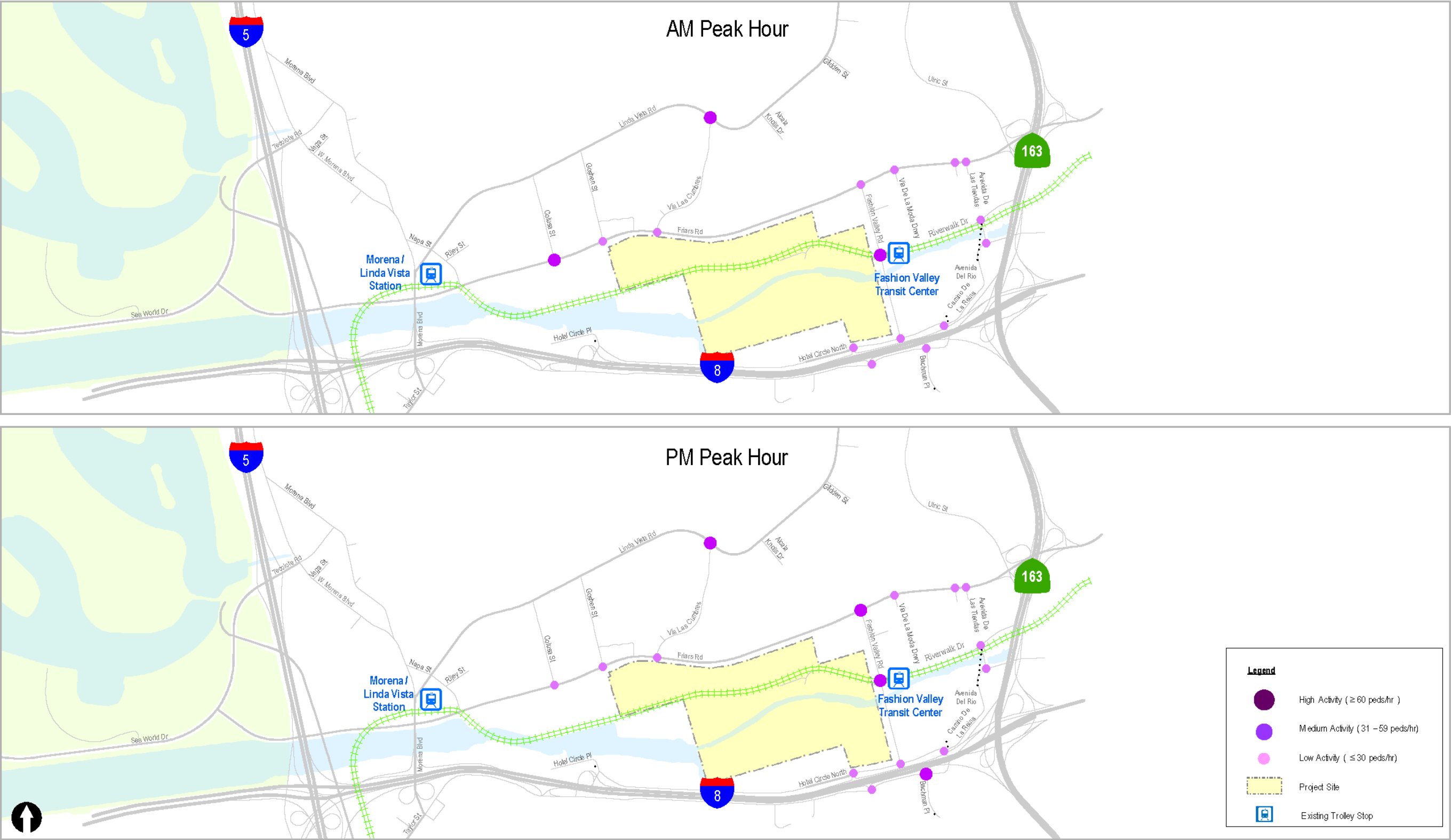


Figure 5.2-5. Existing Pedestrian Activity

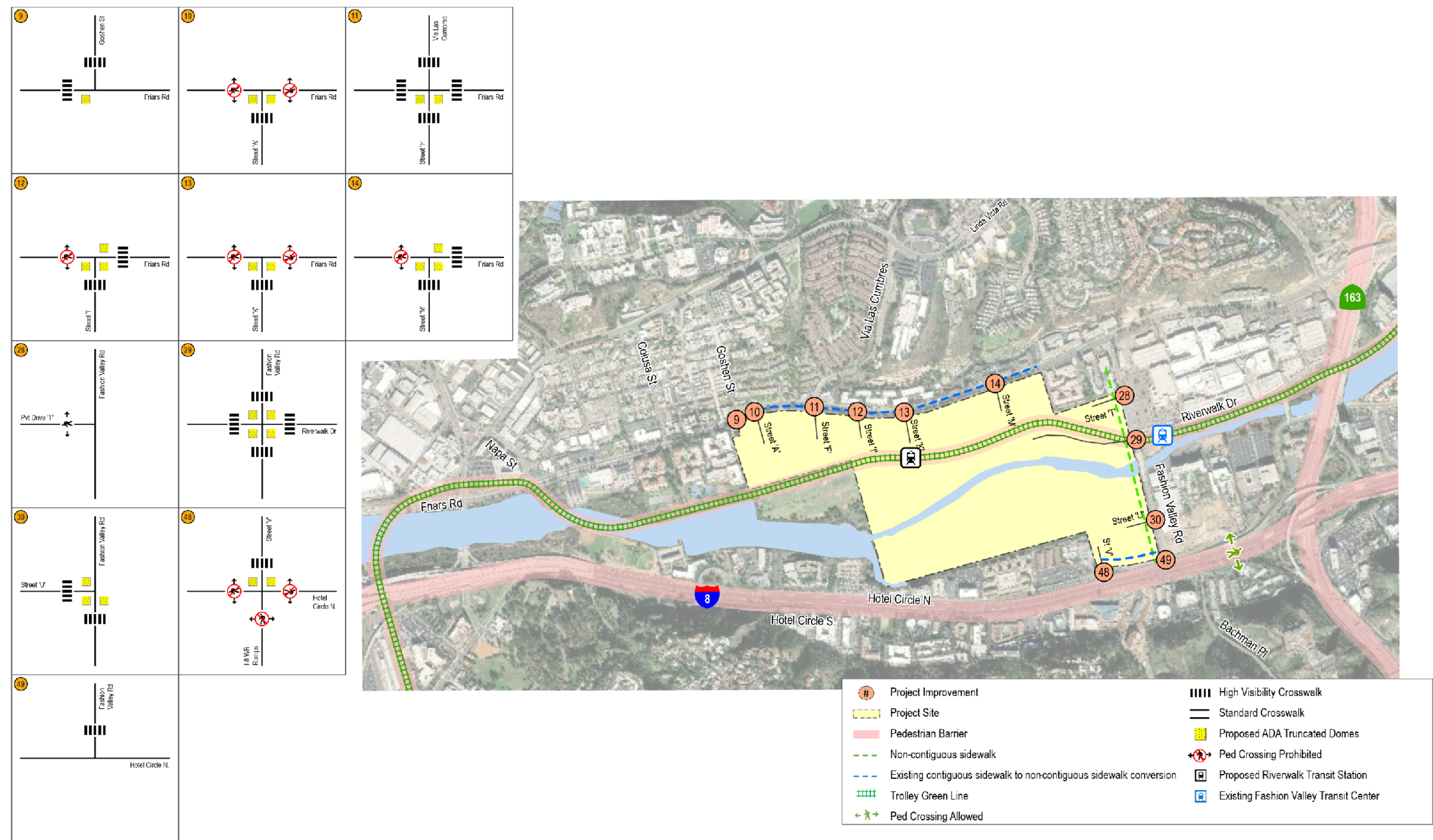


Figure 5.2-6. Pedestrian Network – Project Frontage

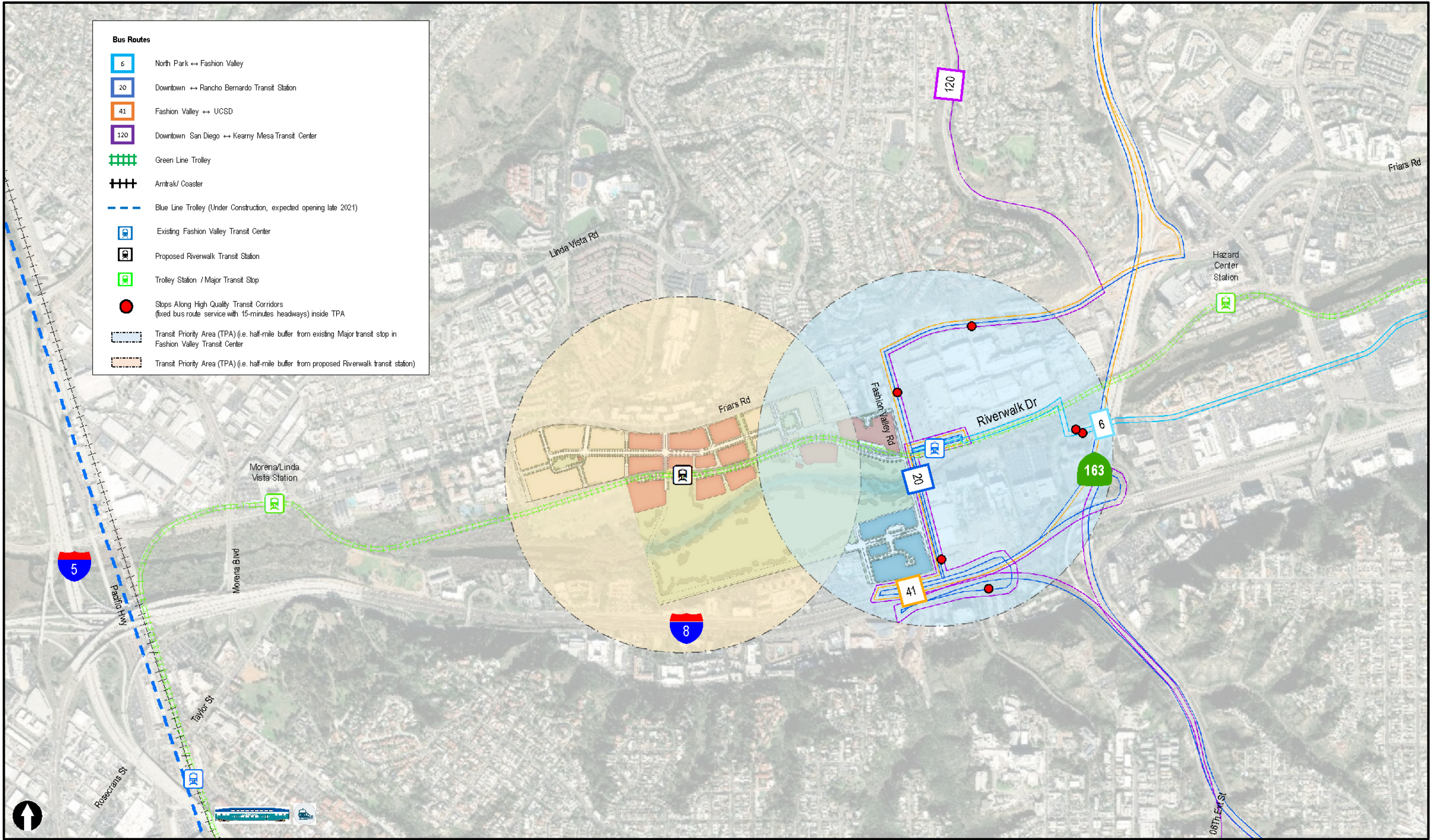


Figure 5.2-7. Proximity to Transit per SB 743

5.3 Visual Effects and Neighborhood Character

This section describes the existing visual setting of the project and vicinity within the context of the surrounding community. Additionally, this section identifies applicable guidelines and regulations related to visual resources and evaluates potential visual impacts related to implementation of the project.

5.3.1 Existing Conditions

5.3.1.1 Views of the On-Site Development

The Riverwalk Specific Plan area is situated in the western portion of central Mission Valley (see Figure 2-3, *Project Location Map*). The approximately 195-acre Specific Plan area is currently developed with the Riverwalk Golf Course, which consists of three nine-hole golf courses, a clubhouse building, driving range, maintenance facility, surface parking, access roadways, and golf cart paths/bridges (see Figure 2-4, *Existing Site Conditions*). Landscaping consists of turf, non-native ornamental vegetation, and trees.

Views of the project site from the north along Friars Road and from the east along Fashion Valley Road are currently of the golf course through a chain link fence, as well as maintenance facilities opposite Via las Cumbres. Because Friars Road sits at a higher elevation than the majority of the project site, where not obstructed by existing development along Friars Road (particularly in the northeast portion of the site), views are of the manufactured golf course sloping down to the San Diego River.

Main access to the site is located off Fashion Valley Road, which makes up the project's eastern boundary, from Riverwalk Drive. Views of the project site from the east are of a graded pad off Fashion Valley Road used for temporary SDG&E vehicle storage, portions of the golf course, the driving range, the San Diego River, and the Green Line Trolley as it enters the project site.

Views from the south are limited by existing berming on the golf course and development (office, multi-family residential, and hotel) along Hotel Circle North. The golf course can be seen from the southwest portion of the project site, with glimpses to the San Diego River.

Public views are not readily provided from the west, due to the proximity of The Courtyards residential development, as well as the elevation difference between western land uses and the project site. Views are further obstructed by landscaping of the golf course and the Courtyards. Where glimpses are possible of the project site, they are of the golf course and golf course landscaping.

5.3.1.2 Views from the Project Site to Off-site Development

Views from the Specific Plan area are of the surrounding urban development. Views to the south are of the I-8 freeway, as well as the backside of the existing hotels along Hotel Circle North ranging in height from two to seven stories, multi-family residential (Presidio View Apartments) that is four stories in height, and multiple office uses that range from two to seven stories in height. Beyond I-8, some of the taller hotel elements that front Hotel Circle South are visible, including recent development of the Morris Cerullo Legacy Center, which has a maximum height of 65 feet. Views from the project site to the north are of existing multi-family residential development ranging in height from two to four stories, two-story office, and single- and two-story commercial development on the north side of Friars Road. Views from the project site to the east are of two- and three-story office buildings, the Fashion Valley Mall parking lots, four-story parking structures, and two- and three-story retail buildings; Fashion Valley Transit Center, with its elevated trolley platform; and active redevelopment of the Town and Country Resort Hotel, which includes conference center buildings and seven- and 10-story towers to remain following redevelopment. Views to the west are of four-story multi-family residential development (The Courtyards) over partial at-grade parking and undeveloped land.

5.3.1.3 Neighborhood Character

The Specific Plan area is located in the urbanized community of Mission Valley. Situated in the west-central portion of the community, the character of the surrounding area is an evolving mix of multi-family residential; hotel development; retail commercial in the form of regional malls and several smaller commercial retail centers and strip malls; and office/employment development, both as mid- and high-rise structures. Redevelopment has recently occurred or is actively occurring within Mission Valley, most notably at:

- The mixed-use redevelopment of the Town and Country Resort Hotel site, immediately east of the project site,
- The Morris Cerullo Legacy Center resort and conference center project, south of the site beyond I-8,
- The Union-Tribune mixed-use project site, located less than one-half mile east of the project site,
- The Alexan Fashion Valley mixed-use project, located less than one-half mile east of the project site,
- The Witt Mission Valley mixed-use project, located approximately one-half mile east of the project site,
- The Millennium Mission Valley mixed-use project, located approximately one-half mile to the east of the project site,

- The Vulcan quarry site that is redeveloping as the Civita neighborhood, located approximately two miles to the east of the project site, and
- The Friars Road Residential Mixed Use Project, which is permitted for redevelopment up to eight and nine stories along Friars Road, northeast of the Specific Plan area.

In addition to redevelopment, the regional malls of Westfield Mission Valley Mall and Fashion Valley Mall are periodically remodeling and modernizing.

5.3.1.4 Light/Glare/Shading

Lighting from commercial office, retail, and multi-family residential development, as well as street lighting on public streets and freeways, predominates the area. Because the majority of development in the project area is comprised of multi-family residential developments, glare from an expanse of windows is minimal. The nearest office building is located to the south of the project site and is approximately seven stories in height. The design of that building combines concrete and windows, which limits the amount of glare. Relative to shading, there are no buildings in the immediate project area that can cast substantial shadows on the project site for extended periods of time.

5.3.2 Regulatory Framework

5.3.2.1 Mission Valley Community Plan

The Urban Design section of the Implementation chapter of the Mission Valley Community Plan contains guidance relative to the public realm, general design, and area-specific design. The following Design Guidelines are relevant to the Riverwalk project. As individual developments come online in conformance with the Riverwalk Specific Plan, they may further address project- and site-specific design guidelines of the Mission Valley Community Plan, as applicable and not in conflict with the Riverwalk Specific Plan.

Public Realm

- **DG-1 Active Commercial Entry Areas.** *In building entry areas in front of ground floor commercial uses, include spaces for outdoor dining, displays (stands, book racks, etc.), planters, and plazas.*
- **DG-2 Entry Area Open Spaces.** *Define entry plazas and passenger loading areas with distinctive paving materials, seating, shade, and attractive landscaping.*
- **DG-3. Sidewalks.** *Provide active pedestrian pathways along all private drives that provide primary access and public streets as noncontiguous sidewalks.*

- **DG-4 Multi-functionality.** Where desirable, encourage the multi-functionality and flexibility of the sidewalk and streetscape by supporting various modes of travel and pedestrian and bicycle amenities (e.g., street furniture, sidewalk dining, bicycle parking).
- **DG-5 Sidewalk Pavers.** Vary pavers in an effort to delineate active pedestrian pathways from passive uses, including landscaping, street furniture, and public space areas.
- **DG-6 Street Trees.** Incorporate street trees into sidewalk buffer areas in order to increase shade, promote carbon sequestration, shield pedestrian pathways, and provide vegetation in the urban environment.
- **DG-8 Landscaping.** Use landscaping strategically to identify pedestrian entrances and articulate edges for plazas and courtyards.
- **DG-9 Sun Exposure.** Locate open space along the east, west, or southern block or building face, where feasible, and design to maximize exposure to the sun, while protecting from wind. Incorporate shaded and sheltered areas in addition to full sun areas.
- **DG-10 Shared Amenities.** Provide amenities for public use within public open spaces, including ample seating (benches, seating walls, movable seating, etc.); trees and other plantings; and shaded and sheltered areas.
- **DG-11 Maintenance.** Ensure that open spaces are clean and well-maintained. Use high-quality, durable materials that are cost-effective, energy efficient, and require minimal maintenance. Potential implementation includes standardized amenities (e.g., benches and trashcans) and energy efficient technology (e.g., solar trash compactors, moisture-sensing sprinklers, and light sensors).
- **DG-12 Pedestrian-Scaled Lighting.** Provide pedestrian-scaled lighting along all walk-ways and common areas. Levels of illumination should be responsive to the type and level of anticipated activity without under- or over-illuminating.
- **DG-16 Green Streets.** Implement Green Streets that can vary in design and appearance while still meeting functional goals (refer to Figure 23 [of the Mission Valley Community Plan])
 - **Alternative Street Designs (Street Widths).** New streets should be planned accordingly so that existing hydrologic functions of the land are preserved (e.g., wetlands, buffers, and high-permeability soils).
 - **Swales.** Vegetated open channels designed to accept sheet flow runoff and convey it in broad shallow flow. Swales reduce storm water volume, improve water quality, and reduce flow velocity.
 - **Bioretention Curb Extensions and Sidewalk Planters.** Attractive planter boxes or curb extensions help infiltrate and store storm water, which reduces runoff volumes and attenuates peak flows.
 - **Permeable Pavement.** Provides structural support, runoff storage, and pollutant removal through filtering and adsorption.
 - **Sidewalk Trees and Tree Boxes.** Street trees are good for the economy, reduce the urban heat island effect and storm water runoff, improve the urban aesthetic, and improve air quality.

Large tree boxes and root paths can be used under sidewalks to expand root zones, which allows street trees to grow to full size.

- **DG-17 Paseos.** *Provide enhanced paths to allow pedestrians to bisect mega blocks and connect to transit/recreation areas. When paseos are needed along property lines, they should be designed to be extended onto adjacent properties.*

General Design

- **DG-18 Reduced and Shared Access.** *Minimize curb cuts and driveway entrances to parking facilities and loading areas. Wherever possible, design driveways to be shared among neighboring properties in order to reduce potential conflicts with pedestrians and bicycles. Provide space for shared transportation services, such as circulators, rideshare vehicles, and microtransit, to allow for the safe pick-up and drop-off of passengers.*
- **DG-19 Lighting.** *Ensure adequate lighting of parking areas to improve visibility and safety. Motion-sensor lighting can reduce energy use.*
 - *Surface lots should have frequently spaced lights no more than 15 feet tall, rather than a few tall bright lights.*
 - *Parking garages should have adequate lighting along façades, but should shield the street from interior garage lighting.*
- **DG-20 Additional Safety Measures.** *Employ design features and programs to enhance safety in parking areas, including prominent and well-illuminated entries. These may include additional lighting along pedestrian paths, low-rise landscaped buffers, and/or a comprehensive surveillance system where applicable.*
- **DG-21 Flexibility.** *Design parking areas to be capable of eventually accommodating parking structures where surface parking is provided.*
- **DG-22 Ground Floor of Structured Parking.** *Reduce the apparent mass on the ground floor through well-proportioned windows, landscaping, screening, and architectural emphasis on pedestrian entries and towers.*
- **DG-23 Parking Structure Façade.** *Provide variation and interest on the façade of parking garages through decorative screens, trellises, ornamental railings, and/or openings that appear as well-proportioned windows.*
- **DG-24 Subterranean Parking Design.** *Activate exposed portions of subterranean garages with landscaping and stoops or terracing.*
- **DG-25 Parking Lot Landscaping.** *Design surface parking lots to incorporate trees for shading and permeable surfaces to minimize storm water runoff.*
 - *Round headed, rather than upright trees should be utilized in parking areas. Parking lot trees should have a mature height and spread of at least 30 feet. They should also be long-lived (60 years), clean, require little maintenance, and be structurally strong, insect and disease-resistant, and require little pruning.*
 - *More than 10 percent of the parking lot area is encouraged to be landscaped. Landscaping areas should be distributed between the periphery and interior landscaping islands and be*

- designed to break up large paved areas. A minimum ten foot wide landscaping island is encouraged. Parking lot landscaping should include primarily ground cover and tall-canopied trees, instead of bushes or short, bushy trees.*
- *To screen parking lots and structures from the street, large dense shrubs may be massed at the edge of the parking area. Trees and shrubs can be combined with earth berms to screen adjacent parking.*
 - **DG-26 Entries.** *Orient the primary building entrance (defined as the entrance which provides the most direct access to a building's lobby and is unlocked during business hours) to face the primary frontage. Secondary building entrances are encouraged to access side streets, parks, or plazas. Building overhangs, canopies, and entryway landscaping should not obstruct views, the street tree canopy, or street signs.*
 - **DG-27 Solar Access and Energy Conservation.** *Employ climate-appropriate design strategies to allow for passive solar access and energy-efficient installations, including:*
 - *Allowing for adequate access to light and air so that daylight is able to reach all living spaces for part of the day, and adequate ventilation is provided when windows are open. Prioritize south-facing windows and private open space.*
 - *Siting building so that plazas and other public spaces will not be kept in shadows at all times and will not experience excessive wind conditions.*
 - *Locating parking areas with large paved surfaces to the east and north of adjacent buildings to reduce solar reflection on buildings.*
 - *Placing evergreen trees on the west side of buildings to provide protection from prevailing winds.*
 - **DG-28 Energy.** *Consider clustering buildings to use a common heating/cooling source.*
 - **DG-29 Crime Prevention and Safety.** *Design buildings and public spaces to be defensible, clearly identified and demarcated, and designed with high visibility and to prevent access of unauthorized persons. This can be accomplished through natural surveillance. Position common spaces, pedestrian pathways, and entries such that they are clearly visible from the street. Position windows to allow for visible sight lines toward public spaces, parking areas, and entrances to dwellings.*
 - **DG-30 Territorial Reinforcement.** *Delineate the transition from public space to private space with signs, pavement, building uses, or other objects. Fencing may only be used if a publicly accessible route is provided through the site.*
 - **DG-31 Building Bulk.** *Encourage variation and articulation through changes in height and massing. This can be achieved through building design that creates smaller masses corresponding to the internal function of the building, modest changes in roof heights, and varied vertical planes.*
 - **DG-32 Diversity and Innovation.** *Find opportunities for diversity, creativity, and innovation in building form.*
 - **DG-33 Shadows.** *Consider the potential shade impacts on the surroundings, and design buildings such that heights, massing, and site plans respond to potential shading issues.*

- **DG-34 Roof Surfaces.** Consider locating sloped roof surfaces facing the south, and at an angle that can accommodate solar panel or film installation for renewable energy generation or centralized solar hot water heating.
- **DG-35 Towers.** Design towers to be slender in order to minimize the casting of large shadows. If large floor-plates are necessary on lower floors, middle and upper floors should taper, step back, or otherwise employ a reduction in massing.
- **DG-36 Vertical Segmentation.** Articulate a distinct building base, middle, and top through changes in materials, colors, or fenestration that reflect the internal function of the building. Avoid repetitive elements or monolithic treatments.
- **DG-37 Ground Floors.** In multi-story buildings, design the ground floor to be tall, prominent, and establish a street presence.
- **DG-38 Façades.** Treat all publicly visible façades of a building equally in terms of materials, colors, and design details. The building should have a finished appearance on all visible sides.
- **DG-39 Limitations on Blank Walls.** Minimize the amount of the linear frontage on the first story street-facing wall that may consist of blank walls. Where blank walls are unavoidable, reduce the impact by:
 - Placing blank walls as out of view as possible from the street.
 - Providing architectural treatments such as panels, contrasting textures, high-quality and interesting building materials, blind windows, planting treatments, murals or other public art, and/or exterior detailing. As much creativity should be given to these walls as to the rest of the façade of the building (Figure 28 [of the Mission Valley Community Plan]).
- **DG-40 Operable Windows.** Wherever applicable, provide operable windows that allow natural ventilation and potentially eliminate the need for mechanical ventilation. If mechanical systems are necessary, use energy-efficient and low emission heating, ventilation, and air conditioning (HVAC) systems.
- **DG-41 Garage Doors.** Reduce the visual prominence of garage doors on the street level using the following methods:
 - Locate garage doors facing a side street wherever feasible. Garage doors are not recommended along pedestrian paths.
 - Dimension garage doors as narrow as is functionally feasible.
 - Place the garage door toward the end of the façade, not in the middle or toward an intersection.
 - Recess the garage door.
 - Call attention to other prominent architectural elements on the façade.
 - Design the garage door to be consistent with the architectural style of the building.
- **DG-42 Visual Access.** Building height, spacing, and bulk should be designed to create landscaped and visually accessible areas from projects to community landmarks and open space features.
- **DG-43 Design of Building Signs.** Design building signage to be compatible with the building architecture and to be harmonious with signs on adjacent buildings. On high-rise buildings, symbols and graphic designs, rather than full building-width lettering, are encouraged.

- **DG-44 High Quality Materials.** Use high- quality, durable architectural materials and finishes that provide a sense of permanence through the exterior and public interior spaces of the buildings. The materials palette should be reflective of the character of the location, type of architecture, and use of the building, and a unified palette of materials should be used on all sides of buildings.
- **DG-45 Energy and Building Materials.** Use building materials which will act as insulators or conductors, depending on energy needs.
- **DG-46 Authentic Materials.** Use authentic materials with a substantial appearance, including natural stone, brick, masonry, tile, wood shingles, metal panels, and glass panels. Avoid using inauthentic materials that have the appearance of thin veneer or attachment such as scored plywood, vinyl, and aluminum siding. If used, inauthentic materials should not be the dominant façade material and should not be used for detailing or ornamentation.
- **DG-47 Architectural Styles.** No particular architectural style is mandated for any area in Mission Valley. However, design should:
 - Be sensitive to the context and the surroundings without necessarily conforming to the architectural styles of surrounding development.
 - Consider and respect the architectural features and styles of adjacent buildings and the surrounding district. Provide compatible or complementary features through architectural details, materials, colors, and lighting. In particular, draw on adjacent or nearby building features that are desirable to achieve compatibility.
- **DG-48 Color.** Employ a color palette that reinforces building identity and complements changes in plane. The body of the building should generally be muted and light in tone to reduce heat gain. Bright colors should be used as accent colors only. A coordinated palette of complementary colors should be used rather than a patchwork of competing colors.
- **DG-49 Family-Oriented Housing.** Design family-oriented housing and units for a range of ages. Opportunities include:
 - Situate family-oriented units on lower floors to maximize accessibility for children and elderly.
 - Provide adequate storage space and design entryways that are visible from inside the home with wider hallways to accommodate stroller and bicycles, etc.
- **DG-50 Views.** Take advantage of views to the San Diego River, hillsides, and other natural features in design, particularly for living areas.
- **DG-51 Privacy.** Maintain a sense of privacy from within housing units, while allowing views onto streets or interior courtyards. In areas with narrow side yards, side elevation windows should be offset from those of the adjacent unit or otherwise obscured (e.g. with frosted glass) to ensure privacy.
- **DG-52 Air and Sunlight Access.** Balance privacy and safety with air and sunlight access, as well as wind protection. Prioritize south facing open space opportunities and design balconies with slatted or partially transparent grating or railing.

- **DG-53 Safety and Security.** *Integrate features that enhance security such as timed lighting and windows that look out onto pedestrian paths. Avoid using bars or security grills on windows and doors.*
- **DG-54 Frontages.** *Articulate frontages to differentiate residential units from each other and from the overall massing. Incorporate porches, stoops, recessed windows, bay windows, accordion/roll-up doors, and balconies to provide visual interest (see Figure 29 of the Mission Valley Community Plan).*
- **DG-55 Residential Windows.** *Design windows to highlight the uses within. In residential areas on upper stories, for example, smaller windows allow more privacy.*
- **DG-56 Ground Floor Private Open Spaces.** *To ensure privacy and sunlight access, provide partially transparent screening or landscaping for open spaces facing a public street, such as tall grasses and fences with openings.*
- **DG-57 Separation from Shared Open Space.** *Separate private open space from common open space with low walls or fencing.*
- **DG-58 Active Uses.** *Prioritize active uses on the ground floor.*
- **DG-60 Compatibility of Uses.** *Maximize compatibility and mutual benefit in the mix of uses. Retail use should be generally limited to the ground-floor spaces along the street.*
- **DG-61 Ground Floor Windows.** *Consider installing operable windows or stacking doors that allow the full length of the storefront to be opened to the sidewalk. At the street level, storefront windows should enliven the street and provide pedestrian views into the interior.*
- **DG-62 Sustainable Materials.** *Where possible, use sustainable building materials. Incorporate recycled, renewable, sustainable, and non-toxic/ low-VOC (volatile organic compound) materials. Use of locally harvested and/or manufactured materials is desired.*
- **DG-63 Sustainable Landscaping.** *Provide attractive and context-sensitive on-site landscaping that minimizes heat gain, is drought-resistant, requires minimal irrigation by:*
 - *Planting deciduous trees on the south side of buildings to shade the south face and roof during the summer while allowing sunlight to penetrate buildings in the winter.*
 - *Exploring vegetation on the exposed east and west facing walls.*
 - *Planting groundcovers that prevent ground reflection and keep the surface cooler, preventing re-radiation.*
 - *Building roof gardens, eco-roofs, or other vegetated roof systems to help reduce the solar heat gain of building roofs and to serve as shared open space.*
 - *Minimizing impervious surfaces that have large thermal gain.*
- **DG-64 Water Efficiency and Conservation.** *Install water saving appliances and systems such as gray water systems, moisture-sensitive irrigation rainwater cisterns, and low-flow toilets and faucets. Any exterior systems should be integrated into building design.*
- **DG-65 Storm Water Capture and Treatment.** *Ensure the design of new development integrates storm water best management practices on site to maximize their effectiveness by:*
 - *Allowing the use of green roofs and water collection devices, such as bioswales, cisterns, and rain barrels, to capture rainwater from the building for re-use.*

- Utilizing disconnected drain sprouts to interrupt the direct flow of rain-water from the buildings to the storm water system. Integrate these features to imbibe buildings with a distinctive architectural character.
- Minimizing on site impermeable surfaces, such as concrete and asphalt. Utilizing permeable pavers, porous asphalt, reinforced grass pavement, cobble stone block pavement, etc. to detain and infiltrate runoff on-site.
- Encouraging the use of permeable paving elements in auto and non-auto-oriented areas.
- **DG-66 Daylight Utilization.** Install timed or motion sensor light fixtures that turn off or dim during daylight hours in interior hallways, foyers, and other spaces that are constantly used.
- **DG-67 Energy Generation.** Integrate energy generation and sustainability such as solar, wind, geothermal or other technologies into the overall building design consistent with the architectural design.
- **DG-68 Carbon Sequestration.** Incorporate new trees into site plans that have the potential for storage and sequestration of high levels of carbon.
- **DG-69 Zero Net Energy Buildings.** Strive for zero net energy in a building design.
- **DG-70 Maintenance.** Develop long-term maintenance for all vegetation to be in accordance with adopted City-wide landscape standards.

Area-Specific Design

- **DG-71 Station Arrival Plaza.** Incorporate an arrival plaza as a visual gateway. Include public art, landscaping, lighting, and pavers to the station and plaza design.
- **DG-72 Station Amenities.** Improve the experience of trolley riders by providing a range of amenities at each trolley station. Amenities may include bike parking, benches, substantial overhangs and/or awning, shelters, information kiosks, public restrooms, and other trolley rider-serving amenities.
- **DG-73 Mobility Hubs.** Design areas around trolley stations to provide for a range of services that can improve first-last mile connections. This includes drop-off/pick-up areas for ride-hailing and shuttle services, space for scooter- and bike-share storage, parking spaces dedicated to car-sharing services, charging stations, and package pick-up areas.
- **DG-74 Mix of Uses.** Promote vertically and horizontally mixed uses within the trolley areas. Enhance livability and neighborhood vitality by providing a range of uses that serve visitors, workers, and residents.
- **DG-75 Identifiable Style.** Encourage building design in each trolley station area to exhibit an identifiable architectural style.
- **DG-76 Walkable Blocks.** Explore opportunities for large site redevelopment to reduce existing block scale by establishing new streets and/or public pedestrian pathways. Block faces longer than 350 feet should provide mid-block crossings to achieve a fine-grained street grid.
 - Design direct and attractive pedestrian routes and pathways to connect trolley stations, local destinations, activity centers (retail core, plaza, etc.), and the surrounding neighborhood.

- *Avoid meandering paths or any treatment that would unnecessarily obstruct the view to the trolley station.*
- *Design pedestrian routes to prioritize public right-of-way. Routes across private land should be open to the public at all time and be clearly marked for public use.*
- **DG-77 Wayfinding.** *Locate directional signage at key locations such as major intersections and trail access points to direct people to trolley stations.*
- **DG-78 Orientation of Development.** *Within Community Nodes, design site plans with buildings facing, and paths leading toward, the Node's "center of gravity."*
- **DG-79 Main Street Facades.** *Strive to achieve a "street wall" effect along Main Streets. Incorporate pedestrian-only paths or alleys to parking areas, open space, or rights-of-way to the rear.*
- **DG-80 Gateway Features.** *Incorporate a signature architectural element, public art, or other gateway features at the end of a Main Street or at the center of a Node to enforce the identity of the area provide a recognizable feature.*
- **DG-81 Pedestrian Scaled Articulation.** *Incorporate pedestrian-scaled façade articulation to create an active and inviting public realm, create visual interest and diversity, and reinforce the pedestrian scale and character of main roadways and pedestrian paths.*
- **DG-82 Amenities.** *Provide amenities for public use, including benches, overlooks, drinking fountains, public bathrooms, and bicycle parking. Amenities may be shared with adjacent public facilities such as transit stations and public parks, per the San Diego River Park Master Plan.*
- **DG-83 Pavers.** *Wherever possible, pave all multi-use portions of the trail. Trail segments may be unpaved when they lead off to interpretive overlooks or when paving may negatively impact sensitive habitats.*
- **DG-84 Overlooks.** *Create overlooks at viewpoints or at nodes where north-south connection to a community meets the San Diego River Pathway. Overlooks may include amenities such as picnic tables, interpretive signs, and seating according to the size of the space.*
- **DG-85 Shading.** *Ensure adequate shading at various portions of the trail throughout the day. Shading provided by trees is more desirable than shadow cast by adjacent development.*
- **DG-86 River Presence.** *Emphasize the location and presence of the river corridor by creating view corridors to the river within development projects and extending landscaping of the riparian corridor—both native trees and understory vegetation—through to the project site.*
- **DG-87 Building Access.** *For development that abuts the River Corridor Area, provide the following: a primary façade and entrance oriented towards the River Corridor Area; and a pedestrian path from the river side of the building to the San Diego River Pathway that utilize the same materials as the primary entrance.*
- **DG-89 Crosswalks.** *At intersections adjacent to the River Corridor Area, consider crosswalks of a different paving material and color than the street, bulb-outs to help ease traffic, signaling that counts down time to cross, and raised crosswalks to match the level of the connecting sidewalk.*
- **DG-90 Architecture.** *Along the River Influence Area, vary buildings in form and façade and avoid repetition in order to create visual interest and to help define view corridors. There should also be*

variety through roof form, recesses or extensions of the façade form, window and curtain wall patterns, shading devices, balconies, material changes, color variation, and surface pattern and texture changes.

- **DG-91 Transparency.** *Design building facades above the ground floor that front the River Corridor Area or a street that abuts and runs parallel to the area to be a minimum of 25 percent transparent. This includes glass windows, display windows, or windows affording views into customer services, offices, galleries, cafes, lobby spaces, or pedestrian entrances.*
- **DG-92 River-Adjacent Landscaping.** *Include sustainably grown wood products and 'green' materials with post-consumer recycled content in landscaping materials. This includes, but is not limited to, fencing, trellises, and hardscapes. Plant materials should frame and enhance views of the River Corridor Area.*
- **DG-93 Public Art.** *Design art within the River Influence Area to celebrate and enhance the river experience, as well as to compliment the natural colors and textures of the river valley where it is located. The placement of public art is encouraged to be viewed not only from the River Influence Area, but also from the San Diego River Pathway in the River Corridor Area. Public art should be integrated into functional elements, such as site furnishings and signage, to engage and educate the public about the river park and its environs.*
- **DG-107 Site Planning.** *In plans for large sites, locate taller buildings so that they act as buffers between residential uses and the freeway.*
- **DG-108 Freeway-Adjacent Landscaping (Buffers).** *Install ample landscaping adjacent to the freeway. This should include understory vegetation as well as trees.*
- **DG-109 Noise Attenuation.** *Buffer residential development from noise with setbacks or elevation differences. Use noise-absorbing building materials and install double-paned windows. Incorporate landscaping materials, landscaped berms, and structural forms in wall design. Consider installation of sound walls where appropriate.*

5.3.2.2 San Diego Municipal Code

Chapters 11 through 15 of the SDMC are referred to as the Land Development Code, as they contain the City's Land Development Regulations that dictate how land is to be developed and used within the City.

Lighting Regulations

Outdoor lighting is regulated by Section 142.0740 of the City of San Diego LDC. The purpose of the City's outdoor lighting regulations is to minimize negative impacts from light pollution including light trespass, glare, and urban sky glow in order to preserve enjoyment of the night sky and minimize conflict caused by unnecessary illumination. Regulation of outdoor lighting is also intended to promote lighting design that provides for public safety and conserves electrical energy. New outdoor lighting fixtures must minimize light trespass in accordance with the Green Building regulations where applicable, or otherwise shall direct, shield, and control light to keep it from falling onto

surrounding properties. No direct-beam illumination is permitted to leave the premises. The City's lighting regulations require that most outdoor lighting be turned off between 11:00 PM and 6:00 AM with some exceptions (such as lighting provided for commercial uses that continue to be fully operational after 11:00 PM, adequate lighting for public safety, etc.).

Glare Regulations

Glare within the City is controlled by SDMC, Section 142.0730 (Glare Regulations). The City's Glare Regulations (City of San Diego 2012) 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 (Section 142.0730 (a)).*
- *Reflective building materials shall not be permitted where the City Manager determines that their use would contribute to potential traffic hazards, diminished quality of riparian habitat, or reduced enjoyment of public open space (Section 142.0730 (b)).*

5.3.3 Impact Analysis

5.3.3.1 Issue 1, Issue 2, and Issue 3

Issue 1 Would the project result in the creation of a negative aesthetic site or project?

Issue 2 Would the project's bulk, scale, materials, or style be incompatible with surrounding development?

Issue 3 Would the project result in substantial alteration to the existing or planned character of the area, such as could occur with the construction of a subdivision in a previously underdeveloped area?

Impact Thresholds

Based on the City's CEQA Significance Determination Thresholds, a project could result in a significant impact associated with visual quality and neighborhood compatibility if it would:

- *Create a disorganized appearance and would substantially conflict with City codes (e.g., a sign plan which proposes extensive signage beyond the City's sign ordinance allowance).*
- *Significantly conflict with the height, bulk, or coverage regulations of the zone and does not provide architectural interest (e.g., a tilt-up concrete building with no offsets or varying window treatment).*
- *Exceed the allowable height or bulk regulations and the height and bulk of the existing patterns of development in the vicinity of the project by a substantial margin.*
- *Include 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.*
- *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 (e.g., Gaslamp Quarter, Old Town).*
- *Be located in a highly visible area (e.g., on a canyon edge, hilltop, or adjacent to an interstate highway) and would strongly contrast with the surrounding development or natural topography through excessive height, bulk, signage, or architectural projections.*

Analysis

Project Compatibility and Community Character

Community character may be split into two categories: the character of the existing natural environment of the community, and the character of the existing built environment. Relative to the natural environment, the community character is defined by the San Diego River that runs through the central portion of the Specific Plan area, as well as the steep hillsides to the north of the project site to the north mesa, connecting Mission Valley to Linda Vista. The steep hillsides are visually and geographically separated from the project site by existing and future multi-family development (the area containing the steep slopes to the northeast of the project site has been approved for and is undergoing redevelopment from commercial office buildings to multi-family residential). Within the Specific Plan area, the proposed landscape plans and regulations and policies of the Riverwalk Specific Plan thematically unify the Riverwalk Specific Plan with the San Diego River and provide transition between the river and development within the Specific Plan area and beyond. The goals, policies, and regulations of the Riverwalk Specific Plan relative to the treatment of and along the river ensure future compatibility of the project with the existing natural environment of the San Diego River.

Relative to the built environment, the character of the surrounding area is an evolving mix of multi-family residential; hospitality development; retail commercial in the form of regional malls and several smaller commercial retail centers; and office development, both as mid- and high-rise structures. Redevelopment has occurred or is actively occurring within Mission Valley, largely in a mixed-use fashion with some combination of multi-family residential, commercial retail, commercial office, and hospitality uses. No single architectural theme is present in Mission Valley or along project frontage roads.

The project would be a mixed-use development consisting of residential, office and non-retail commercial, commercial retail, and parks and open space uses. The Specific Plan allows for future structures that range in height up to 200 feet (structures in the North and Central Districts would be limited to seven stories in height), with parking structures and minimal surface parking. Based on the Design Guidelines outlined in the Specific Plan, the project's massing, colors, and materials would be compatible with adjacent development. Land uses proposed by the project currently exist

within the project's surrounding area. The project's allowed setbacks and massing would provide for a transition from existing development to the west and northeast. Chapter 6, *Land Uses, Development Standards, and Design Guidelines*, of the Specific Plan contains discussion, policies, and Tailored Development Standards relative to site planning, setbacks, and massing. Additionally, district-specific policies of the Specific Plan for the North District address abutting residential developments (Policy N-1 through Policy N-4), as well as special treatment area policies relative to The Courtyards condominium complex to the west (Policy N-7 through Policy N-9) and Mission Greens condominium complex to the northeast (Policy N-10 through Policy N-15). Redevelopment has already occurred or is already occurring at a larger scale within the Mission Valley community, trending toward mixed-use projects and walkable, pedestrian-friendly developments. As such, the project would not result in substantial alteration to the existing or planned character of the area.

The design criteria and policies included in the Specific Plan are intended to define and guide development to create a visually and functionally integrated urban environment. While detailed architecture would be defined at the time of Building Permit submittal for each individual development project, the Riverwalk Specific Plan contains discussion, goals, and policies relative to architectural styles and design. Per Section 6.3.9, *Architectural Style and Development Aesthetics*, the following discussion would provide overarching guidance for architectural style and building materials.

A variety of architectural styles and building materials are envisioned for Riverwalk. Different architectural styles are encouraged and are intended to co-exist in the overall Specific Plan to provide for independent and distinct neighborhood character and identifying elements. The use of a variety of building materials provides additional opportunity to create distinctive elements within each District and to lend an air of authenticity and timelessness to neighborhood development.

The building aesthetics within each of the Districts should complement each other, without resulting in homogeneity. This may include having similarly sized massing elements, materials, or overall building character. The buildings should feature enhanced and high-quality materials to encourage pedestrian activity and visual interest. The ground plane and the first floor of each building should be enhanced through architectural details, street furniture, and other amenities.

Because architectural style is constantly changing, the type of architecture within a particular planning District will be determined at the time a given parcel is brought forward for development. The type of architecture ultimately selected for each parcel will depend on market trends and design styles at the time of development. However, all buildings will adhere to cohesive design elements, such as quality building materials and similar landscape palette, to create cohesion and aesthetic harmony throughout. This Specific Plan encourages distinct architectural

styles that address project- and District-specific identities as an integral component of placemaking.

Additional policies and discussion throughout Chapter 6 of the Specific Plan further define project architecture, materials, massing, site planning, and other design parameters. Highly reflective glass would not be used in any manner prohibited by the following components of the Riverwalk Specific Plan and/or the San Diego LDC:

- River Corridor General Design Theme – *Discourage use of highly reflective plate glass on building elevations that face the river.*
- River Influence Area building façades - *Building façades that front the River Corridor Area shall not include materials with a visible light reflectivity (VLR) factor greater than 30 percent and shall consult architectural design guidance of the American Bird Conservancy Bird-Friendly Design.*

Consistent architectural themes would be emphasized throughout the elements of design, color, materials, and finish, as well as signage and landscaping. The consistency of themes serves to unify Riverwalk's land uses and product types, giving the neighborhood a distinctive and easily recognizable identity. Buildings developed in accordance with the Riverwalk Specific Plan would regularly vary in mass, bulk, scale, design style, and materials. A specific goal of the Riverwalk Specific Plan is to introduce architectural variability, which would avoid monotonous and overly uniform urban form and would create a sense of place. With consistency in themes identified, coupled with the variability in building-to-building design, the intent of the Riverwalk Specific Plan is to create a harmonious and visually interesting neighborhood. As such, architecture would be complementary to the vision for Mission Valley, as land use policies evolve and redevelopment projects emerge. The vision for Mission Valley is in part guided by the design guidelines of the Mission Valley Community Plan. The project's application of and consistency with the previously-identified applicable design guidelines is shown in Table 5.3-1, *Riverwalk Application of Mission Valley Community Plan Applicable Design Guidelines*.

The project would not create a negative aesthetic site or property, nor would it create a disorganized appearance. Building materials would be compatible with what exists currently, conveying the character of an urban project and reflecting the Mission Valley setting. The project's architectural elements are intended to provide interesting and identifiable features, which would allow pedestrians and motorists to easily find their destinations. Architectural features such as varied building material, heights, and setbacks would provide vertical relief to the façades and would create focal points around the project for both pedestrians and passing vehicles. Plant materials would be used at the ground level to not only create interest, but also integrate architectural forms within the site. The Specific Plan's goals, policies, regulations, and overall discussion would require greater architectural detail and color palette than what is existing on-site and in the nearby development, as presented in Table 5.3-1. Project design includes recessed and protruding elements, such as

windows and balconies, to add visual interest and character to the project site. Building mass and rooflines would be varied, as would be proposed finishes and materials, as described above. Paths, walkways, and buildings would include a variety of materials and colors to create visual interest and encourage a higher level of use. The project would not degrade the visual character of the project site or its surrounding. The project would also not result in creating a negative aesthetic site or property.

Views

The Mission Valley Community Plan includes the following design guideline, relative to views:

- **DG-50 Views.** *Take advantage of views to the San Diego River, hillsides, and other natural features in design, particularly for living areas.*

The Riverwalk Specific Plan includes discussion of views and view corridors in Section 3.5, *Site Planning and View Corridors*. View corridors are considered both within the Specific Plan area and also into the site from adjacent roadways (Figure 5.3-4, *Riverwalk View Corridors*). These are views as seen by pedestrians, from automobiles and transit, and other individuals passing by the property at the street level. Most of the views from I-8 are obscured by existing development. The Riverwalk Specific Plan would additionally afford views from the north and south into the Riverwalk River Park. Views of other elements of Riverwalk's open space system include emphasis on view corridors from Friars Road through the development parcels of the North District and Central District toward the San Diego River. A major view corridor into the San Diego River would be provided from Fashion Valley Road. Section 3.5.2, *Views and View Corridors*, of the Riverwalk Specific Plan includes the following additional discussion:

The placement and orientation of buildings should reflect the visual corridor objectives by organizing in a pattern which emphasizes these focal points. Providing interior view opportunities defines the urban character of Riverwalk through a variety of spaces linked by walkways and plazas, and articulated by overhead structures that frame views and create a changing spatial experience for pedestrians. Tree-framed view corridors are encouraged.

Bulk and Scale

The Riverwalk Specific Plan would allow development that would vary in height up to 200 feet (building height in the North and Central Districts would be limited to seven stories). Residential buildings within Riverwalk would include parking primarily in above-ground parking structures incorporated into individual project design in the North and Central Districts. Additional parking structures would be located in the South District, adjacent to employment buildings that may house non-retail commercial, retail, and/or residential uses. The project would include an articulated network of parks, plazas, open space, and other areas for gathering, and various walkways and trails promoting pedestrian and bicycle activity through the project site. Open spaces further break up the

bulk and scale of the project and allow views into the project and to the San Diego River, avoiding a solid massed appearance along the roadways or from vantage points.

The flood elevation of the San Diego River across the project site varies. Portions of the project site are currently above the flood elevation, while others are below the flood elevation. Grading would be required to ensure that all development areas are above the flood elevation and in accordance with City regulations. In total, 173.6 acres (or 89 percent of the total project site) would be graded; 0.65 acre of off-site area would also be graded. Remedial grading, which would involve the removal and recompaction of alluvium, would consist of 1,506,700 cy. The amount of cut would be 426,400 cy, with a maximum cut depth of 24 feet. The amount of fill would be 1,454,000 cy (requiring 1,028,000 cy of import), with a maximum fill depth of 32 feet. Grading would be required to raise developable portions of the project site out of the 100-year floodplain, and to leave the site in a manner to allow for development as required by the Riverwalk Specific Plan and VTM. The graded site would appear generally consistent with what occurs today, with relative level development pads following site topography gently sloping toward the San Diego River.

The project also proposes construction of multiple retaining walls throughout the project site. A retaining wall would be constructed on the north side of Riverwalk Drive, on either side of Street J, to support the trolley tracks. The maximum exposed height of this wall would be 18 feet, tapering down to zero feet at the eastern and western ends of the wall. There is another wall on the north side of Riverwalk drive to support the trolley stop. Another retaining wall would be located on the west side of Street V, which would be constructed from Hotel Circle North into the project site. This wall is required to protect the drainage along the property line and would be approximately 450 feet in length and at a maximum height of 3.5 feet. Appearance of retaining walls would be softened with the planting of vines and other traveling landscaping at the base of the walls, trailing landscaping at the top of the walls, intermittent planters along the walls, and/or other landscaping methods available and appropriate at the time of construction. With appropriate landscaping and retaining walls, the project would not result in a significant impact to visual effects.

Additionally, development of Riverwalk would include the following three Tailored Development Standards relative to retaining walls. (1) Relative to retaining wall regulations in all zones, included in LDC §142.0340(c)(1), two retaining walls with a maximum height of three feet are permitted in the required front and street side yards, if the two retaining walls are separated by a minimum horizontal distance equal to the height of the upper wall. The retaining walls on the southern boundary of Lot QQ adjacent to the transit stop and the southeastern corner of Lot SS are in excess of three feet and necessary to support the MTS Trolley Tracks. Two three-foot retaining walls would not provide the needed separation for Street 'J' to cross under the MTS Trolley Tracks; therefore, a single retaining wall that ranges in height from 23 feet to less than three feet would be allowed (the length of wall above three feet in height would be 298 feet), provided it includes landscaping such as vines and trees to assist with masking the wall.

(2) Relative to LDC §142.0340(c)(3), retaining walls of three feet in height or greater are required to have at least one horizontal or vertical offset for each 120 square feet of wall area, except where otherwise provided in LDC §142.0340(f). The horizontal or vertical offset shall be at least 12 inches wide with a minimum reveal of four inches. Vertical or horizontal offsets for every 120 square feet of wall area would not be practical for a retaining wall necessary to support the MTS Trolley Tracks that reaches a height of 23 feet. Offsets would be provided through the use of vines, trees, or other landscaping elements.

(3) Relative to retaining wall height outside of required yards regulations in all zones, LDC §142.0340(e) requires that retaining walls located outside of the required yards not exceed 12 feet in height. The retaining wall located near the rear of Lot 28 would not be visible from a public right-of-way and would largely be lower than the elevation of the MTS Trolley Tracks that are adjacent to the rear of Lot 28. Since the retaining wall would be provided to allow access to a Public Utility facility that crosses under the MTS Trolley Tracks, it cannot be screened with trees or shrubs; however, it would be screened with vines plant above and below the wall.

These Tailored Development Standards provide for landscaping to screen the visual appearance of retaining walls. No significant visual impact would result from the retaining walls allowed with application of these Tailored Development Standards.

Alteration of Character

The project would result in a change to the existing character of the community of the area, as the site is currently developed as a golf course and the project proposes the development of an integrated infill mixed-use neighborhood. The project would be consistent with the planned character of the community of the area, both as presented in the Mission Valley Community Plan and as demonstrated by project incorporation of applicable Mission Valley Community Plan design guidelines, as shown in Table 5.3-1. As described above, the character of Mission Valley is evolving, particularly in the area of the project, where redevelopment projects are being implemented. The project is consistent with the planned land use and design guidelines of the Mission Valley Community Plan; impacts relative to alteration of the character of the community of the area, therefore, would be less than significant.

Significance of Impacts

The project would not result in substantial alteration to the existing or planned character of the area. The project would not contrast with existing surrounding development through excessive height or bulk. Retaining walls proposed would not be in excess of height and length regulations, except as noted with the Tailored Development Standards above. The project's bulk, scale, and materials would be compatible with the surrounding development. The project would not create a disorganized appearance, nor would it result in an architectural style or building materials in contrast with surrounding development. Therefore, impacts would be less than significant.

Mitigation Measures

Mitigation would not be required.

5.3.3.2 Issue 4

Issue 4 Would the project create substantial light or glare that would adversely affect daytime or nighttime views in the area?

Impact Thresholds

Based on the City's CEQA Significance Determination Thresholds, a project could result in a significant impact associated with light and glare if it would:

- *Be moderate to large in scale, more than 50 percent of any single elevation of a building's exterior is built with a material with a light reflectivity greater than 30 percent, and the project is adjacent to a major public roadway or public area.*
- *Shed substantial light onto adjacent, light-sensitive property or land use, or would emit a substantial amount of ambient light into the nighttime sky. Uses considered sensitive to nighttime light include, but are not limited to, residential, some commercial and industrial uses, and natural areas.*

Analysis

The project area currently contains existing lighting sources, such as on-site lighting for buildings and golf cart paths, lighting from golf carts, parking area lighting, and lighting for the driving range. Adjacent sources of light occur from streetlights along major surrounding roadways, surrounding developments, and associated parking lighting.

Lighting

Landscaping and architectural features of the project would be illuminated and accented with lighting. Lighting would be provided for parking structures and surface parking areas. Additional lighting would be provided in pedestrian and circulation areas for added security. The project would not create a new source of substantial light that would adversely affect daytime or nighttime views in the area. Outdoor lighting would be regulated by compliance with Section 142.0740 of the City LDC and would not trespass onto adjacent properties or into the nighttime sky. In addition, the Specific Plan includes policies relative to lighting. However, where the Specific Plan does not address a specific lighting regulation or requirement, the LDC requirements apply. The following are the policies relative to lighting:

Riverwalk Specific Plan - Section 6.5.10, Outdoor Lighting

The design issue of lighting includes street lighting and lighting for open space and park areas, as well as building and landscape accent light and sign illumination. The following policies should be considered in the provision of lighting:

- *Policy-44. Street lights should provide a safe and desirable level of illumination for motorists, pedestrians, and bicyclists.*
- *Policy-45. Lighting should not intrude into residential areas. Where feasible, all lighting should be comprised of full cut-off fixtures to minimize light pollution and glare.*
- *Policy-46. Lighting fixtures should relate to the human scale, especially security lighting and lighting in pedestrian areas.*
- *Policy-47. Lighting and lighting fixtures should complement the design and character of the environment in which they are placed.*
- *Policy-48. Enhanced lighting should be utilized in areas designed as primary connections between residential and commercial area, as well as to public transit facilities. Shielding, appropriately scaled lighting fixtures, and light wattage are all measures to ensure against escape of light into unintended areas, such as residential units or natural areas.*
- *Policy-49. Safety lighting adjacent to the San Diego River corridor must be directed lighting, as opposed to general lighting, to prevent spill-over and illumination of habitat areas in compliance with the City's MHPA adjacency guidelines.*

Site lighting is an important design issue that affects public streets, bicycle travel ways, open space, parks, and private areas. The lighting of these areas can encourage use after sunset and before sunrise, which increases the opportunities for social interaction, active transportation, and the creation of neighborhood, as well as promotes safety through longer hours of neighborhood use. One of the main objectives of the Riverwalk Specific Plan is to encourage active transportation movements such as walking and bicycles. The American National Standard Practice for Roadway Lighting (RP-8-00) may serve as a guide to supplement the minimum City standards for street lighting.

Lighting along trails, paths, walkways, and sidewalks should combine pedestrian-scale lighting with the adjacent building lighting, so as not to overwhelm the pedestrian/bicyclist.

- *Reg-86. Lighting adjacent to the San Diego River shall comply with the City's MHPA guidelines for lighting.*
- *Reg-87. Pedestrian/bicycle tunnels will be internally lit and include mirrors.*

Security lighting fixtures should not project above the face of the buildings and are to be shielded and match the surface to which they are attached.

- *Reg-88. Security lighting fixtures shall not substitute for the parking lot and/or walkway/path lighting fixtures.*

Illuminated entries should direct lighting low to the ground and be limited to only the immediate vicinity of the entry. Lighted entries should complement the building and should not be distracting or create visual clutter or glare.

The following additional lighting policy and regulations are included in the Riverwalk Specific Plan:

- *Policy-78. Low-wattage and/or LED light features, lighting controls, zoned lighting banks, and time-controlled lighting for public areas should be used.*
- *Reg-109. The primary pedestrian paths shall have adequate security lighting and signage to provide for the safety of the users.*
- *Reg-117. All bikeways shall have adequate lighting and signage to provide for the safety of the users as determined by the City Engineer. Lighting and signage within 100 feet of the River Corridor Area shall be shielded and directed away from the River Corridor Area.*

Lighting within the River Corridor Area is regulated as follows, per the San Diego River Park Master Plan: *Reg-143. Light posts shall not exceed 12 feet in height (lighting for public streets excepted). All lighting within 100 feet of the River Corridor Area shall be shielded and directed away from the River Corridor Area.* Lighting within the River Influence Area is regulated as follows, per the San Diego River Park Master Plan: *Reg-160. All lighting within 100 feet of the River Corridor Area shall be shielded and directed away from the River Corridor Area.*

Glare

Generally, glare within the Riverwalk Specific Plan area would be regulated by the LDC to ensure no impact would occur relative to glare. Glare would be avoided in accordance with Section 142.0730 of the LDC. Less than 50 percent of building façades would incorporate glass or other reflective material that would cause glare effects on surrounding roadways and properties. Where glass is incorporated, it would be non-reflective in nature and meet the 30 percent reflectivity factor requirement.

The Riverwalk Specific Plan requires lighted building entries to not create glare; discourages of the use of highly reflective plate glass on building elevations facing the San Diego River (*building façades that front the River Corridor Area shall not include materials with a visible light reflectivity factor greater than 30 percent*); and regulates the use of highly reflective glass in any manner prohibited by the Mission Valley Community Plan, the SDRPMP, or the LDC. Additionally, with the following Specific Plan policies that address glare, the project would be precluded from creation of significant glare:

- *Policy-45. Lighting should not intrude into residential areas. Where feasible, all lighting should be comprised of full cut-off fixtures to minimize light pollution and glare.*
- *Reg-98. Evergreen canopy-form shade trees are to be used within surface parking area to reduce solar glare and provide variation in character. Trees shall be provided at a rate of one canopy form tree within 30 feet of each parking stall. Species shall be selected from the Recommended Plant Materials (Riverwalk Specific Plan Section 3.6.9, Recommended Plant Materials).*

Shading

The project would not contribute to shading of surrounding areas. Within the North and Central Districts, building heights are limited by the Riverwalk Specific Plan to seven stories. Where abutting existing off-site development occurs, additional setbacks and stepbacks are required by the Riverwalk Specific Plan. As such, the project would not contribute substantial shading to off-site uses. In the South District, development is limited to 200 feet in height and potential shadows from buildings would fall primarily on-site into the South District; the southeastern portion of Riverwalk River Park; on roadways of the South District and Hotel Circle North; and a portion of the adjacent Town and Country Resort Hotel, which is currently developed as parking lot and conference center/ballroom space and is being redeveloped to include multi-family residential units. Such effects would not substantially interfere with useable areas since shading would be limited and dependent on time of year and the sun's location in the sky. Off-site shading would be comparable to what occurs as a result of surrounding development today, with no buildings tall enough to create permanent pockets of shade off-site throughout the day. Similar to surrounding development and typical of mid-rise urban development, shading provided by the project would move throughout the day with the movement of the sun. Shadows from development in the Riverwalk Specific Plan area would not result in a significant impact.

Significance of Impacts

The project would not result in significant lighting, glare, or shading impacts. The Specific Plan is not anticipated to create a new source of substantial light that would adversely affect daytime or nighttime views in the area, as the project lighting would be in conformance with the City's outdoor lighting regulations, as well as the regulations and policies of the Specific Plan. Glare impacts would not occur because the project would consist of less than 50 percent reflective materials in compliance with the City's glare regulations; development projects would be further required to comply with regulations and policies of the Riverwalk Specific Plan relative to glare. The impact of shadows cast by the project would not be considered significant.

Mitigation Measures

Mitigation would not be required.

5.3.3.3 Issue 5

Issue 5 Would the project result in the loss of any distinctive or landmark tree(s), or stand of mature trees as identified in a community plan?

Impact Thresholds

According to the City's Significance Determination Thresholds, a project is considered to have a significant impact if the project would result in the physical loss, isolation, or degradation of a community identification symbol or landmark (e.g., a stand of trees, coastal bluff, historic landmark) that is identified in the General Plan, applicable community plan, or local coastal program.

Analysis

The Mission Valley Community Plan does not identify any distinctive or landmark tree(s), or any stand of mature trees. Vegetation on-site includes mature trees. The Riverwalk Specific Plan includes the following language relative to the preservation of existing mature trees: *Existing on-site tree specimens will be analyzed on an individual basis for preservation in their present or in a new location to the greatest extent feasible. All efforts will be made to preserve mature trees where possible. Existing trees will be analyzed and assessed in accordance with Council Policy 900-19 and the Conserve-A-Tree Program.* This regulation would require evaluation of on-site trees to preserve existing mature trees, where possible.

Additionally, the Specific Plan includes the following policy relative to existing trees along Friars Road:

- *Policy-55. To the greatest extent feasible, the existing trees lining the south side of Friars Road will be retained to reinforce the visual character of Friars Road.*

No impacts relative to distinctive or landmark trees, or a stand of mature trees, as identified in the Mission Valley Community Plan would occur.

Significance of Impact

No distinctive, landmark, or stand of mature trees is identified on the project site. However, the Specific Plan makes provision for the retention of existing mature trees, which would ensure that impacts are less than significant.

Mitigation Measures

Mitigation would not be required.

5.3.3.4 Issue 6

Issue 6 Would the project result in a substantial change in the existing landform?

Impact Threshold

According to the City's Significance Determination Thresholds, *a project is considered to have a significant impact if a project would result in more than 2,000 cy of earth per graded acre by either excavation or fill. In addition, one or more of the following conditions (1 through 4) must apply to meet this significance threshold:*

- 1. The project would disturb steep hillsides in excess of the encroachment allowances of the Environmentally Sensitive Lands regulations (LDC Chapter 14, Article 3, Division 1). In evaluating this issue, environmental staff should consult with permit staff.*
- 2. The project would create manufactured slopes higher than ten feet or steeper than 2:1 (50 percent).*
- 3. The project would result in a change in elevation of steep hillsides as defined by the SDMC Section 113.0103 from existing grade to proposed grade of more than 5 feet by either excavation or fill, unless the area over which excavation or fill would exceed 5 feet is only at isolated points on the site. (A continuous elevation change of 5 feet may be noticeable in relation to surrounding areas. In addition, such a change may require retaining walls and other features to stabilize slopes, potentially resulting in a manufactured appearance.)*
- 4. The project design includes mass terracing of natural slopes with cut or fill slopes in order to construct flat-pad structures.*

However, the above conditions may not be considered significant if one or more of the following apply:

- 1. The grading plans clearly demonstrate, with both spot elevations and contours, that the proposed landforms will very closely imitate the existing on-site landform and/or the undisturbed, pre-existing surrounding neighborhood landforms. This may be achieved through "naturalized" variable slopes.*
- 2. The grading plans clearly demonstrate, with both spot elevations and contours, that the proposed slopes follow the natural existing landform and at no point vary substantially from the natural landform elevations.*
- 3. The proposed excavation or fill is necessary to permit installation of alternative design features such as step-down or detached buildings, non-typical roadway or parking lot designs, and alternative retaining wall designs which reduce the project's overall grading requirements.*

Analysis

Development in accordance with the Riverwalk Specific Plan would result in greater than 2,000 cy of earth per graded acre by either excavation or fill. As discussed previously, grading associated with development of the Specific Plan would involve approximately 1,506,700 cy of grading required for alluvium removal and recompaction; 426,400 cy of cut; and 1,454,000 cy of fill. However, none of the conditions identified above would apply to the project. The project would not disturb steep hillsides in excess of the encroachment allowances of the Environmentally Sensitive Lands regulations (LDC Chapter 14, Article 3, Division 1), as the project site does not contain steep hillsides. The project would not create manufactured slopes steeper than 2:1 (50 percent). The project would not result in a change in elevation of steep hillsides as defined by the SDMC Section 113.0103, as there are no steep hillsides present on-site. The project design does not include mass terracing of natural slopes with cut or fill slopes in order to construct flat-pad structures, as no natural slopes are present on-site. Since the project would not meet any of the primary conditions, the secondary criteria delineated above does not apply.

Significance of Impact

The Specific Plan area does not contain steep hillsides and would not involve grading that exceeds the secondary significance thresholds relative to grading. Impacts to landform alteration would be less than significant.

Mitigation Measures

Mitigation would not be required.

5.3.3.5 Issue 7

Issue 7 Would the project result in a substantial obstruction of any vista or scenic view from a public viewing area as identified in the community plan?

Impact Thresholds

The City's Significance Determination Thresholds establish thresholds for potential impacts to *public views from designated open space areas, roads, or parks, and for project impacts to visual landmarks or scenic vistas*. In order for a project to result in a significant impact, *one or more of the following conditions must apply:*

- *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;*
 - *The project would cause substantial view blockage from a public viewing area of a public resource (such as the ocean) that is considered significant by the applicable community plan;*
- or*

- *The project exceeds the allowed height or bulk regulations, and this excess results in a substantial view blockage from a public viewing area.*

Analysis

The Mission Valley Community Plan does not identify any designated public view corridors nor does it include designated public viewing areas that are considered significant. Although not specially identified as such in the Mission Valley Community Plan, the San Diego River is considered a significant visual resource within Mission Valley. As previously discussed and as illustrated in Figure 5.3-4, the Specific Plan would create view corridors, which would be preserved and enhanced. The Specific Plan would not exceed the allowed height (limited to seven stories in the North District and Central District) or bulk and scale regulations. Specific development regulations, such as project-specific height limits, would result in less height that could be developed on-site with standard zoning and would allow for views over project development from the north mesa of Linda Vista to the San Diego River area. The Specific Plan's regulations on bulk and setbacks would ensure buildings would not encroach into the view corridors established by the Specific Plan. Impacts to public views would be less than significant.

Significance of Impact

The Mission Valley Community Plan does not include any designated view corridors or public viewing areas. As the San Diego River is a significant visual resource of the community, the Specific Plan would create view corridors through the Specific Plan area to the river for view preservation. Impacts would be less than significant.

Mitigation Measures

Mitigation would not be required.

Table 5.3-1. Riverwalk Application of Mission Valley Community Plan Applicable Design Guidelines.

Mission Valley Community Plan Design Guideline	Riverwalk Specific Plan Application.
Public Realm	
DG-1 Active Commercial Entry Areas. In building entry areas in front of ground floor commercial uses, include spaces for outdoor dining, displays (stands, book racks, etc.), planters, and plazas.	The Riverwalk Specific Plan includes special guidance for ground level activation areas (see Riverwalk Specific Plan, Section 6.4.6, <i>Activated Interfaces</i>). The Retail Activation Interface (Figure 5.3-1, <i>Riverwalk Specific Plan Retail Activation Interface</i>) requires that an enhanced pedestrian experience shall be accomplished through enhanced paving, storefront canopies or outdoor seating in areas near building entrances, cafés, and restaurants. Wider sidewalks onto private property are encouraged to accommodate sidewalk cafés.
DG-2 Entry Area Open Spaces. Define entry plazas and passenger loading areas with distinctive paving materials, seating, shade, and attractive landscaping.	<p>Building entries are addressed throughout the Riverwalk Specific Plan, in particular in Section 6.3.6, <i>Building to Street Relationship</i>:</p> <p><i>One of the critical objectives of the Riverwalk Specific Plan is to create a friendly and appealing pedestrian environment, which is, in part, the result of site planning and architecture that emphasizes the relationship between Riverwalk's streets and the buildings that front onto these streets. To that end, the buildings should be oriented to the internal streets to reinforce the urban character of Riverwalk.</i></p> <p><i>Buildings shall engage the public realm through various activating conditions and uses. Within these areas, buildings shall have, as appropriate to the building design and topography constraints:</i></p> <ul style="list-style-type: none"> • <i>Enhanced public lobbies and/or entrances addressing the street;</i> • <i>Ground floor individual unit entries;</i> • <i>Patios;</i> • <i>Ground floor resident amenities; and/or</i> • <i>Outdoor seating or display for retail use.</i>
DG-3. Sidewalks. Provide active pedestrian pathways along all private drives that provide primary access and public streets as noncontiguous sidewalks.	As shown in Figure 3-4, <i>Pedestrian Circulation</i> , the Riverwalk Specific Plan would establish a multi-faceted pedestrian circulation network, which would include sidewalks along public streets and private drives, as well as walkways within open space areas. As shown in Figure 4-11 through Figure 4-36 of the Riverwalk Specific Plan, the majority of Riverwalk's street would develop with non-contiguous sidewalks.
DG-3. Sidewalks. Provide active pedestrian pathways along all private drives that provide primary access and public streets as noncontiguous sidewalks.	

Mission Valley Community Plan Design Guideline	Riverwalk Specific Plan Application.
<p>DG-4 Multi-functionality. <i>Where desirable, encourage the multi-functionality and flexibility of the sidewalk and streetscape by supporting various modes of travel and pedestrian and bicycle amenities (e.g., street furniture, sidewalk dining, bicycle parking).</i></p>	<p>As shown in Figure 3-4 and Figure 3-6, Riverwalk would develop an extensive multi-modal circulation network, which includes the sidewalks, dedicated bicycle facilities, and multi-modal facilities that would provide flexibility for all modes of active transportation. Bicycle amenities, including parking, would be provided throughout the Specific Plan area, as described in Section 6.5.3, <i>Parking</i>, of the Riverwalk Specific Plan, and included within the Mobility Design Objectives of the Specific Plan. Sidewalk dining is supported throughout the regulations and policies of the Specific Plan, including Section 6.3.6, <i>Building to Street Relationship</i>, and Section 6.6, <i>District Specific Guidelines</i>. Street furniture in the form of public seating and other pedestrian amenities are supported throughout the Riverwalk Specific Plan, including in Section 6.3.6, <i>Building to Street Relationship</i>, Section 6.3.7, <i>Mixed-Use Core/Retail/Transit/Trolley Stop</i>, Section 6.4.6, <i>Activated Interfaces</i>, and Section 6.6, <i>District Specific Guidelines</i>.</p>
<p>DG-6 Street Trees. Incorporate street trees into sidewalk buffer areas in order to increase shade, promote carbon sequestration, shield pedestrian pathways, and provide vegetation in the urban environment.</p>	<p>Greenbelt and street trees are incorporated into the Riverwalk Specific Plan (Figure 5.3-2, <i>Riverwalk Greenbelt and Street Trees</i>). Included in Section 3.6.9, <i>Recommended Plant Materials</i>, of the Riverwalk Specific Plan are the variety of tree species that may be planted in the various greenbelt and street tree area. The recommended plant materials include evergreen and deciduous canopy trees to increase shade, promote carbon sequestration, shield the pedestrian pathways, and provide vegetation in the urban environment.</p>
<p>DG-8 Landscaping. Use landscaping strategically to identify pedestrian entrances and articulate edges for plazas and courtyards.</p>	<p>Section 6.5.11, <i>Landscape Features</i>, of the Riverwalk Specific Plan includes the landscape policies for the Specific Plan area, including streetscape design and open areas, such as plazas and courtyards. The planting palette identified in Section 3.6.9, <i>Recommended Plant Materials</i>, of the Specific Plan organizes plant material in a manner that landscaping assists in project component identification.</p>
<p>DG-9 Sun Exposure. Locate open space along the east, west, or southern block or building face, where feasible, and design to maximize exposure to the sun, while protecting from wind. Incorporate shaded and sheltered areas in addition to full sun areas.</p>	<p>The Riverwalk Specific Plan incorporates the following policies relative to sun exposure/solar access:</p> <ul style="list-style-type: none"> • <i>Policy-21. Building placement should consider indoor and outdoor privacy, solar access, public and private open space, and overall aesthetics.</i> • <i>Policy-76. Strive for innovative site design and building orientation to reduce energy use by taking advantage</i>

Mission Valley Community Plan Design Guideline	Riverwalk Specific Plan Application.
	<p><i>of sun-shade patterns, prevailing winds, landscaping, and sun-screens.</i></p> <ul style="list-style-type: none"> • <i>Policy-86. Deciduous trees should be used in south-facing and west-facing outdoor areas around buildings to provide solar access during winter months and shade in hot summer months.</i>
<p>DG-10 Shared Amenities. Provide amenities for public use within public open spaces, including ample seating (benches, seating walls, movable seating, etc.); trees and other plantings; and shaded and sheltered areas.</p>	<p>As described in Section 6.5.16, <i>River Corridor Area</i>, Section 3.2, <i>Parks</i> (in particular, Section 3.2.1, <i>Riverwalk River Park</i>), shared amenities within Riverwalk's public spaces would include seating and benches, shade structures, and landscaping.</p>
<p>DG-11 Maintenance. Ensure that open spaces are clean and well-maintained. Use high-quality, durable materials that are cost-effective, energy efficient, and require minimal maintenance. Potential implementation includes standardized amenities (e.g., benches and trashcans) and energy efficient technology (e.g., solar trash compactors, moisture-sensing sprinklers, and light sensors).</p>	<p>The Riverwalk Specific Plan includes a discussion of maintenance responsibilities in Section 7.7, <i>Maintenance Requirements</i>. Maintenance within Riverwalk is broken into parkways and public areas (Section 7.7.1) to include public parks and private development landscaped areas (Section 7.7.2). Responsibilities are clearly discussed in Section 7.7 and illustrated in Figure 7-3 of the Riverwalk Specific Plan to ensure that proper maintenance occurs.</p>
<p>DG-12 Pedestrian-Scaled Lighting. Provide pedestrian-scaled lighting along all walk-ways and common areas. Levels of illumination should be responsive to the type and level of anticipated activity without under- or over-illuminating.</p>	<p>Section 6.5.10, <i>Outdoor Lighting</i>, of the Riverwalk Specific Plan includes a number of policies related to the design and placement of outdoor lighting in the Specific Plan area. Relative to pedestrian-scaled lighting, Policy-46 states that <i>[l]ighting fixtures should relate to the human scale, especially security lighting and lighting in pedestrian areas</i>. Additional language in this section states <i>[l]ighting along trails, paths, walkways, and sidewalks should combine pedestrian-scale lighting with the adjacent building lighting, so as not to overwhelm the pedestrian/bicyclist</i>.</p>
<p>DG-16 Green Streets. Implement Green Streets that can vary in design and appearance while still meeting functional goals (refer to Figure 23 of the Mission Valley Community Plan)</p> <ul style="list-style-type: none"> • Alternative Street Designs (Street Widths). New streets should be planned accordingly so that existing hydrologic functions of the land are preserved (e.g., wetlands, buffers, and high-permeability soils). • Swales. Vegetated open channels designed to accept sheet flow runoff and convey it in broad shallow flow. Swales reduce storm water volume, improve water quality, and reduce flow velocity. • Bioretention Curb Extensions and Sidewalk Planters. Attractive planter boxes or curb extensions help infiltrate and store storm water, 	<p>The Riverwalk Specific Plan incorporates bioswales and street trees into the Specific Plan, as described in Specific Plan Section 3.6.6 and Section 3.6.1, respectively. Street trees are also illustrated in Figure 5.3-2 of this EIR.</p>

Mission Valley Community Plan Design Guideline	Riverwalk Specific Plan Application.
<p>which reduces runoff volumes and attenuates peak flows.</p> <ul style="list-style-type: none"> • Permeable Pavement. Provides structural support, runoff storage, and pollutant removal through filtering and adsorption. • Sidewalk Trees and Tree Boxes. Street trees are good for the economy, reduce the urban heat island effect and storm water runoff, improve the urban aesthetic, and improve air quality. Large tree boxes and root paths can be used under sidewalks to expand root zones, which allows street trees to grow to full size. 	
<p>DG-17 Paseos. Provide enhanced paths to allow pedestrians to bisect mega blocks and connect to transit/recreation areas. When paseos are needed along property lines, they should be designed to be extended onto adjacent properties.</p>	<p>Development as envisioned by the Riverwalk Specific Plan would not result in any mega blocks. However, paseos are encouraged in the Specific Plan area to enhance the pedestrian experience. Specific language relative to paseos in Section 3.2.2, <i>Urban Parks</i>, of the Riverwalk Specific Plan states: <i>As described in the Mission Valley Community Plan, paseos are enhanced pedestrian paths that provide ingress/egress through development projects that are privately owned and publicly accessible. Paseos can create corridors that function as secondary frontages for business storefronts and product displays or for café seating and plazas. Paseos may be anchored by new spaces that serve as space for seating, music, performances, art, and festivals. Actual design and locations of paseos will be determined as individual developments come online.</i></p>
General Design	
<p>DG-18 Reduced and Shared Access. Minimize curb cuts and driveway entrances to parking facilities and loading areas. Wherever possible, design driveways to be shared among neighboring properties in order to reduce potential conflicts with pedestrians and bicycles. Provide space for shared transportation services, such as circulators, rideshare vehicles, and microtransit, to allow for the safe pick-up and drop-off of passengers.</p>	<p>Relative to reduced/shared access, the Riverwalk Specific Plan includes the following policies and regulation:</p> <ul style="list-style-type: none"> • <i>Policy-74. When feasible, vehicular access should be provided through shared driveways at property lines.</i> • <i>Policy-75. Driveway entrances to parking areas should minimize disturbances to the pedestrian continuity of the sidewalk areas.</i> • <i>Reg-121. Rideshare drop-off/pick-up areas shall be designated to avoid conflicts with the circulation system.</i>
<p>DG-19 Lighting. Ensure adequate lighting of parking areas to improve visibility and safety. Motion-sensor lighting can reduce energy use.</p> <ul style="list-style-type: none"> • Surface lots should have frequently spaced lights no more than 15 feet tall, rather than a few tall bright lights. 	<p>Parking lot lighting would be required to adhere to policies and regulations of the Riverwalk Specific Plan, specifically those within Section 6.5.10, <i>Outdoor Lighting</i>, as well as Section 6.5.13, <i>Sustainable Features</i>, which addresses lighting and energy use.</p>

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<ul style="list-style-type: none"> Parking garages should have adequate lighting along façades, but should shield the street from interior garage lighting. <p>DG-20 Additional Safety Measures. Employ design features and programs to enhance safety in parking areas, including prominent and well-illuminated entries. These may include additional lighting along pedestrian paths, low-rise landscaped buffers, and/or a comprehensive surveillance system where applicable.</p>	<p>The project has been designed with Crime Prevention Through Environmental Design (CPTED) as referenced in Section 5.1.4 of the Specific Plan. CPTED elements include a mixture of uses to support 24-hour life and eyes on the street, as well as lighting. The Riverwalk Specific Plan includes policies and regulations that relate to additional safety measures:</p> <ul style="list-style-type: none"> <i>Policy-44. Street lights should provide a safe and desirable level of illumination for motorists, pedestrians, and bicyclists.</i> <i>Policy-48. Enhanced lighting should be utilized in areas designed as primary connections between residential and commercial area, as well as to public transit facilities. Shielding, appropriately scaled lighting fixtures, and light wattage are all measures to ensure against escape of light into unintended areas, such as residential units or natural areas.</i> <i>Policy-49. Safety lighting adjacent to the San Diego River corridor must be directed lighting, as opposed to general lighting, to prevent spill-over and illumination of habitat areas in compliance with the City's MHPA adjacency guidelines.</i> <i>Reg-109. The primary pedestrian paths shall have adequate security lighting and signage to provide for the safety of the users.</i> <i>Reg-117. All bikeways shall have adequate lighting and signage to provide for the safety of the users as determined by the City Engineer. Lighting and signage within 100 feet of the River Corridor Area shall be shielded and directed away from the River Corridor Area.</i> <p>The following discussion and regulations are also included in Section 6.5.10, <i>Outdoor Lighting</i>:</p> <p><i>Lighting along trails, paths, walkways, and sidewalks should combine pedestrian-scale lighting with the adjacent building lighting, so as not to overwhelm the pedestrian/bicyclist.</i></p> <ul style="list-style-type: none"> <i>Reg-86. Lighting adjacent to the San Diego River shall comply with the City's MHPA guidelines for lighting.</i>

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	<ul style="list-style-type: none"> Reg-87. <i>Pedestrian/bicycle tunnels will be internally lit and include mirrors.</i> <p><i>Security lighting fixtures should not project above the face of the buildings and are to be shielded and match the surface to which they are attached.</i></p> <ul style="list-style-type: none"> Reg-88. <i>Security lighting fixtures shall not substitute for the parking lot and/or walkway/path lighting fixtures.</i> <p><i>Illuminated entries should direct lighting low to the ground and be limited to only the immediate vicinity of the entry. Lighted entries should complement the building and should not be distracting or create visual clutter or glare.</i></p>
<p>DG-21 Flexibility. Design parking areas to be capable of eventually accommodating parking structures where surface parking is provided.</p>	<p>The Riverwalk Specific Plan includes the following policy, relative to flexibility in parking:</p> <p><i>Policy-32. Provision for future vehicular innovations, such as autonomous vehicles, should be accommodated as those technologies become more prevalent in the future. Should structured parking become unnecessarily abundant, parking structures may be re-purposed to alternative uses within the land use constraints of this Specific Plan.</i></p>
<p>DG-22 Ground Floor of Structured Parking. Reduce the apparent mass on the ground floor through well-proportioned windows, landscaping, screening, and architectural emphasis on pedestrian entries and towers.</p>	<p>The Riverwalk Specific Plan includes policies for integration of parking structure design, including the ground floor of structured parking:</p> <ul style="list-style-type: none"> <i>Policy-17. When parking garages are provided, they should be integrated into each new development and should occur under or adjacent to each structure or related group of structures, providing for the most efficient use of space and direct access for the user. Ground-level parking spaces should be utilized for retail activity whenever feasible, but should be minimized to avoid expansive open parking areas.</i> <i>Policy-31. Parking structures should be architecturally integrated with development to reduce the visual prominence devoted to parking.</i> <i>Policy-33. Development of Riverwalk provides off-street parking facilities that are attractively designed and integrated into development. The parking pattern will be created through the joint use and physical interconnection of parking areas and garages, when feasible.</i>

Mission Valley Community Plan Design Guideline	Riverwalk Specific Plan Application.
<p>DG-23 Parking Structure Façade. Provide variation and interest on the façade of parking garages through decorative screens, trellises, ornamental railings, and/or openings that appear as well-proportioned windows.</p>	<p>The Riverwalk Specific Plan includes the following policy relative to parking structure façades:</p> <p><i>Policy-31. Parking structures should be architecturally integrated with development to reduce the visual prominence devoted to parking.</i></p>
<p>DG-24 Subterranean Parking Design. Activate exposed portions of subterranean garages with landscaping and stoops or terracing.</p>	<p>Any exposed portions of subterranean garages would be required to be architecturally integrated into development design, consistent with Specific Plan Policy-17, Policy-31, and Policy-33.</p>
<p>DG-25 Parking Lot Landscaping. Design surface parking lots to incorporate trees for shading and permeable surfaces to minimize storm water runoff.</p> <ul style="list-style-type: none"> • Round headed, rather than upright trees should be utilized in parking areas. Parking lot trees should have a mature height and spread of at least 30 feet. They should also be long-lived (60 years), clean, require little maintenance, and be structurally strong, insect and disease- resistant, and require little pruning. • More than 10 percent of the parking lot area is encouraged to be landscaped. Landscaping areas should be distributed between the periphery and interior landscaping islands and be designed to break up large paved areas. A minimum ten foot wide landscaping island is encouraged. Parking lot landscaping should include primarily ground cover and tall-canopied trees, instead of bushes or short, bushy trees. • To screen parking lots and structures from the street, large dense shrubs may be massed at the edge of the parking area. Trees and shrubs can be combined with earth berms to screen adjacent parking. 	<p>Parking lot landscaping allows for softening of the aesthetic of these areas and improved ecology by filtering runoff, reducing urban heat island effect, and passive air quality improvements. The Riverwalk Specific Plan includes the following policies and regulations relative to parking lot landscaping:</p> <ul style="list-style-type: none"> • <i>Policy-56. Evergreen trees and shrubs may be combined with earthen berms to screen surface parking and parking structures from adjacent view corridors, development, streets, and river views.</i> • <i>Policy-57. Cascading-type plant materials may be used in edge planters along each level of parking.</i> • <i>Reg-97. Surface parking areas shall be broken into sections. Each parking area is to be separated by landscape buffers. Exclusive of setbacks from public streets a minimum of ten percent of the parking area shall be landscaped.</i> • <i>Reg-98. Evergreen canopy-form shade trees are to be used within surface parking area to reduce solar glare and provide variation in character. Trees shall be provided at a rate of one canopy form tree within 30 feet of each parking stall. Species shall be selected from the Recommended Plant Materials (Riverwalk Specific Plan Section 3.6.9, Recommended Plant Materials).</i> • <i>Reg-99. Within Vehicular Use Areas, tree wells shall have a minimum root zone of 40 square feet with no dimension less than five feet, per the City's Landscape Regulations. Where trees are placed within the Vehicular Use Area, diamond shaped planters shall not be allowed. Instead, trees shall be placed in either finger islands or placed in planters spanning the width of two parking stalls (approximately 16 feet) for a depth of three feet at the head of each abutting parking stall (approximately six feet) and centered with parking stall striping.</i> • <i>Reg-100. Trees shall provide a canopy when at mature height and spread. They should be known as strong,</i>

Mission Valley Community Plan Design Guideline	Riverwalk Specific Plan Application.
<p>DG-26 Entries. Orient the primary building entrance (defined as the entrance which provides the most direct access to a building's lobby and is unlocked during business hours) to face the primary frontage. Secondary building entrances are encouraged to access side streets, parks, or plazas. Building overhangs, canopies, and entryway landscaping should not obstruct views, the street tree canopy, or street signs.</p>	<p><i>insect and disease resistant, deep-rooted, tolerant of street environments, low-maintenance, drought tolerant, and long living, if possible.</i></p> <p>Street activation would occur throughout Riverwalk and would be a prevalent feature that residents, employees, and visitors experience. Street activation shall occur regardless of the specific land use fronting the street. Examples of the street activation interface features are illustrated in Figure 5.3-3, <i>Riverwalk Specific Plan Street Activation Interface</i>, and include special treatments for building lobbies, patios, and resident amenities/retail, as described below (excerpt from Riverwalk Specific Plan Section 6.4.6, <i>Activated Interfaces</i>):</p> <ul style="list-style-type: none"> • <i>Policy-26. Where possible, first floor patios should provide direct access to the sidewalk, and outdoor seating for adjacent uses shall be provided near entrances and amenities.</i> • <i>Reg-26. Building lobbies shall orient the primary entrance and exit toward the activated street interface to add life and activity at the street level.</i> • <i>Reg-27. Articulated features, such as canopies and/or architectural building signage, shall enhance the lobbies and entrances.</i> • <i>Reg-28. Residential units on the ground floor shall provide patios or direct entrances, where feasible.</i> • <i>Reg-29. Residential amenities on the ground floor such as a fitness or business center shall utilize storefront glass windows, large roll-up windows, or other transparent elements to give the appearance of retail and invite views of the interior space.</i> • <i>Reg-30. Enhanced paving shall be utilized in high-traffic pedestrian areas, as well as street furniture, such as benches, trash cans, and/or bicycle racks.</i>
<p>DG-27 Solar Access and Energy Conservation. Employ climate-appropriate design strategies to allow for passive solar access and energy-efficient installations, including:</p> <ul style="list-style-type: none"> • Allowing for adequate access to light and air so that daylight is able to reach all living spaces for part of the day, and adequate ventilation is provided when windows are open. Prioritize south-facing windows and private open space. • Siting building so that plazas and other public spaces will not be kept in shadows at all times and will not experience excessive wind conditions. 	<p>The following policies and regulations of the Riverwalk Specific Plan address solar access and energy conservation:</p> <ul style="list-style-type: none"> • <i>Policy-21. Building placement should consider indoor and outdoor privacy, solar access, public and private open space, and overall aesthetics.</i> • <i>Policy-86. Deciduous trees should be used in south-facing and west-facing outdoor areas around buildings to provide solar access during winter months and shade in hot summer months.</i>

Mission Valley Community Plan Design Guideline	Riverwalk Specific Plan Application.
<ul style="list-style-type: none"> Locating parking areas with large paved surfaces to the east and north of adjacent buildings to reduce solar reflection on buildings. Placing evergreen trees on the west side of buildings to provide protection from prevailing winds. 	<ul style="list-style-type: none"> <i>Policy-87. Vestibule use at entryways should be considered in order to reduce heat and cold infiltration into buildings.</i> <i>Policy-88. Overhangs or canopies should be used, where possible, to shade areas from direct sunlight and reduce heat gain.</i> <i>Policy-90. Consider larger surface parking areas to be located to the east and north of adjacent buildings to reduce solar reflection on buildings.</i> <i>Reg-98. Evergreen canopy-form shade trees are to be used within surface parking area to reduce solar glare and provide variation in character. Trees shall be provided at a rate of one canopy form tree within 30 feet of each parking stall. Species shall be selected from the Recommended Plant Materials (Riverwalk Specific Plan Section 3.6.9, Recommended Plant Materials).</i> <i>Reg-128. Utilize trees to maximize energy efficiency. Place evergreen trees in surface parking lots to diminish heat island effect.</i>
<p>DG-28 Energy. Consider clustering buildings to use a common heating/cooling source.</p>	<p>Sustainable building practices, including energy conservation/efficiency, is addressed in Riverwalk Specific Plan Section 6.5.13, <i>Sustainable Features</i>. Policy-75 strives for <i>innovative site design and building orientation</i>, which may include clustering of buildings, as appropriate.</p>
<p>DG-29 Crime Prevention and Safety. Design buildings and public spaces to be defensible, clearly identified and demarcated, and designed with high visibility and to prevent access of unauthorized persons. This can be accomplished through natural surveillance. Position common spaces, pedestrian pathways, and entries such that they are clearly visible from the street. Position windows to allow for visible sight lines toward public spaces, parking areas, and entrances to dwellings.</p>	<p>As addressed Section 5.1.4, <i>Police</i>, of the Riverwalk Specific Plan, the Riverwalk project would incorporate CPTED design measures as a means of reducing potential incidents of crime in the neighborhood.</p>
<p>DG-30 Territorial Reinforcement. Delineate the transition from public space to private space with signs, pavement, building uses, or other objects. Fencing may only be used if a publicly accessible route is provided through the site.</p>	<p>The Riverwalk Specific Plan includes the following discussion relative to the differentiation of public and private spaces within Section 6.5.9:</p> <p><i>Along Riverwalk's pedestrian-oriented residential streets, heights of fences and walls should differentiate between the public and private realms without creating a total visual barrier between the sidewalk and building. Low fences and walls or substantial planter boxes can provide an attractive distinction between public walkways and private residential spaces, while also enhancing the character of Riverwalk's active pedestrian street-scene.</i></p>

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<p>DG-31 Building Bulk. Encourage variation and articulation through changes in height and massing. This can be achieved through building design that creates smaller masses corresponding to the internal function of the building, modest changes in roof heights, and varied vertical planes.</p>	<p>The form and scale of development conveys a story about the use within and acts as a transitional element where adjacent to existing development. Building massing can creatively mask the intensity of development to allow for maximum site efficiency within a less obtrusive form. The following policies of the Riverwalk Specific Plan address bulk and scale:</p> <ul style="list-style-type: none"> • <i>Policy-13. Structures should create transitions in form and scale between large buildings and adjacent smaller buildings.</i> • <i>Policy-14. Massing of buildings should present a cluster of forms with landscaped open areas as an integral part of the site plan, to create courtyards and plaza areas between buildings and to avoid the appearance of a uniform building mass along roadways and pedestrian pathways. Varying building heights, setbacks, and planes can create a visually satisfying structure and help define view corridors. Intermittently step back upper levels to reduce perceived scale of buildings. Step backs should be varied and interspersed, as appropriate, to avoid a homogeneously stepped massing.</i> • <i>Policy-15. Transitions between the street and buildings at the pedestrian level should create visual interest and promote human activity.</i> • <i>Policy-16. Buildings and landscaped slopes should transition down to the river to provide major view corridors and open up areas to maintain comfortable scale relationships and avoid walling off amenity areas.</i> • <i>Policy-21. Buildings should be designed to visually minimize the impact of large continuous massing elements, both within Riverwalk and from the surrounding community. To achieve this, each building shall incorporate variations in heights and setbacks to reduce the architectural scale and massing element. Care should be taken to ensure not all buildings are a wrap design.</i> • <i>Policy-22. Visual corridors through Riverwalk should be respected and encouraged by building setbacks, step backs, and articulation.</i> • <i>Policy-23. Uninterrupted walls of structures should be avoided.</i>
<p>DG-32 Diversity and Innovation. Find opportunities for diversity, creativity, and innovation in building form.</p>	<p>The Riverwalk Specific Plan includes the following discussion and policy relative to innovation:</p>

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	<ul style="list-style-type: none"> • Long Term Flexibility Design Objective - <i>Allow flexibility for innovative and creative development and design solutions that respond to market trends during the construction phase of the project.</i> • Policy-76. <i>Strive for innovative site design and building orientation to reduce energy use by taking advantage of sun-shade patterns, prevailing winds, landscaping, and sun-screens.</i>
DG-33 Shadows. Consider the potential shade impacts on the surroundings, and design buildings such that heights, massing, and site plans respond to potential shading issues.	Section 6.4.1, <i>Site Planning</i> , of the Riverwalk Specific Plan include the provision that site planning <i>take into account orientation of buildings and the creation of view corridors</i> . This consideration for orientation may include potential shadows, on- and off-site.
DG-34 Roof Surfaces. Consider locating sloped roof surfaces facing the south, and at an angle that can accommodate solar panel or film installation for renewable energy generation or centralized solar hot water heating.	Roof treatments within the Riverwalk Specific Plan may include roofline variations, residential terraces and other amenity uses, parking areas, and/or solar arrays. Roof design would take into account the LDC regulations in place at the time individual developments come forward. Additional policies of the Specific Plan relative to rooflines include: <ul style="list-style-type: none"> • <i>Policy-3. Design and development of buildings should complement the landscape through features such as terraces and roofscapes.</i> • <i>Policy-11. Special attention shall be paid to roof area treatment and materials in all buildings.</i> • <i>Policy-18. Residential buildings should make use of balconies, decks, roof terraces, or other features that provide texture and depth of building façades and allow views of open spaces. Flat roofs may be designed for human use as terraces, gathering decks, and gardens.</i>
DG-35 Towers. Design towers to be slender in order to minimize the casting of large shadows. If large floor-plates are necessary on lower floors, middle and upper floors should taper, step back, or otherwise employ a reduction in massing.	Section 6.4.1, <i>Site Planning</i> , of the Riverwalk Specific Plan include the provision that site planning <i>take into account orientation of buildings and the creation of view corridors</i> . This consideration for orientation may include potential shadows, on- and off-site. Additionally, Policy-1 of this section addresses orientation of taller buildings to maximize sun exposure.
DG-36 Vertical Segmentation. Articulate a distinct building base, middle, and top through changes in materials, colors, or fenestration that reflect the internal function of the building. Avoid repetitive elements or monolithic treatments.	Section 6.4.2, <i>Materials and Treatments</i> , Section 6.4.3, <i>Form and Scale</i> , Section 6.4.4, <i>Architectural Use</i> , and Section 6.4.5, <i>Building Style and Massing Guidelines</i> , of the Riverwalk Specific Plan include policies emphasize articulation of buildings through materials, massing, form and scale, and architectural elements that would articulate distinct building features, including vertical segmentation.

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<p>DG-37 Ground Floors. In multi-story buildings, design the ground floor to be tall, prominent, and establish a street presence.</p>	<p>Reinforced throughout the Riverwalk Specific Plan is the need for an articulated ground plane and first floor of buildings. This is specifically addressed in Section 6.3.7, <i>Mixed-Use Core/Retail/Transit/Trolley Stop</i>, Section 6.3.9, <i>Architectural Style and Development Aesthetics</i>, Section 6.4.6, <i>Activated Interfaces</i>, and Section 6.6, <i>District Specific Guidelines</i>.</p>
<p>DG-38 Façades. Treat all publicly visible façades of a building equally in terms of materials, colors, and design details. The building should have a finished appearance on all visible sides.</p>	<p>High-quality materials and thoughtful application of architectural treatments are key components of the Riverwalk Specific Plan to ensure neighborhood cohesion across varying architectural styles and timelines within which development would occur in the Riverwalk Specific Plan area. Riverwalk Specific Plan policies that guide materials and treatments include:</p> <ul style="list-style-type: none"> • <i>Policy-7. Construction materials shall convey the character of an urban project and reflect the Mission Valley setting.</i> • <i>Policy-8. Design features should be incorporated into all structures to increase visual interest at street level. A series of openings and/or façade details that approximate the scale of any entryway into the building and open to the exterior on at least one side create a feeling of invitation to pedestrians.</i> • <i>Policy-9. Buildings at the perimeter of the neighborhood may reflect the architectural elements of the adjacent buildings.</i> • <i>Policy-12. Paths, walkways, and buildings should include a variety of materials and colors to create visual interest and encourage a higher level of use.</i>
<p>DG-39 Limitations on Blank Walls. Minimize the amount of the linear frontage on the first story street-facing wall that may consist of blank walls. Where blank walls are unavoidable, reduce the impact by:</p> <ul style="list-style-type: none"> • Placing blank walls as out of view as possible from the street. • Providing architectural treatments such as panels, contrasting textures, high-quality and interesting building materials, blind windows, planting treatments, murals or other public art, and/or exterior detailing. As much creativity should be given to these walls as to the rest of the façade of the building (Figure 28 of the Mission Valley Community Plan). 	<p>The Riverwalk Specific Plan includes a specific policy to avoid expanses of blank walls:</p> <ul style="list-style-type: none"> • <i>Policy-23. Uninterrupted walls of structures should be avoided.</i> <p>Additionally, the Specific Plan promotes high-quality materials and an articulated color palette in Section 6.2, <i>Design Objectives</i>, Section 6.3.9, <i>Architectural Style and Development Aesthetics</i>, Section 6.4, <i>Architectural Foundation</i>, and Section 6.4.2, <i>Materials and Treatments</i>.</p>
<p>DG-40 Operable Windows. Wherever applicable, provide operable windows that allow natural ventilation and potentially eliminate the need for</p>	<p>The Riverwalk Specific Plan includes the following policy, which promotes the use of operable windows:</p>

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<p>mechanical ventilation. If mechanical systems are necessary, use energy-efficient and low emission heating, ventilation, and air conditioning (HVAC) systems.</p>	<ul style="list-style-type: none"> • <i>Policy-84. Maximize the use of natural ventilation in buildings.</i> <p>Relative to HVAC systems, the following policy is applicable:</p> <ul style="list-style-type: none"> • <i>Policy-83. Energy efficient HVAC systems.</i>
<p>DG-42 Visual Access. Building height, spacing, and bulk should be designed to create landscaped and visually accessible areas from projects to community landmarks and open space features.</p>	<p>The San Diego River is a community landmark that runs through the central portion of the Specific Plan area. The Riverwalk Specific Plan includes a discussion of views and view corridors in Section 3.5, <i>Site Planning and View Corridors</i>, and view corridors are shown on Figure 5.3-4 of this EIR. The Riverwalk Specific Plan includes the following discussion relative to views and view corridors:</p> <p><i>The placement and orientation of buildings should reflect the visual corridor objectives by organizing in a pattern which emphasizes these focal points. Providing interior view opportunities defines the urban character of Riverwalk through a variety of spaces linked by walkways and plazas, and articulated by overhead structures that frame views and create a changing spatial experience for pedestrians. Tree-framed view corridors are encouraged.</i></p>
<p>DG-44 High Quality Materials. Use high- quality, durable architectural materials and finishes that provide a sense of permanence through the exterior and public interior spaces of the buildings. The materials palette should be reflective of the character of the location, type of architecture, and use of the building, and a unified palette of materials should be used on all sides of buildings.</p>	<p>The Riverwalk Specific Plan includes the following discussion relative to building materials (Riverwalk Specific Plan Section 6.3.9, <i>Architectural Style and Development Aesthetics</i>):</p> <p><i>A variety of architectural styles and building materials are envisioned for Riverwalk. Different architectural styles are encouraged and are intended to co-exist in the overall Specific Plan to provide for independent and distinct neighborhood character and identifying elements. The use of a variety of building materials provides additional opportunity to create distinctive elements within each District and to lend an air of authenticity and timelessness to neighborhood development.</i></p> <p><i>[...]The buildings should feature enhanced and high-quality materials to encourage pedestrian activity and visual interest. The ground plane and the first floor of each building should be enhanced through architectural details, street furniture, and other amenities.</i></p>

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	<i>[...][A]ll buildings will adhere to cohesive design elements, such as quality building materials and similar landscape palette, to create cohesion and aesthetic harmony throughout. This Specific Plan encourages distinct architectural styles that address project- and District-specific identities as an integral component of placemaking.</i>
DG-45 Energy and Building Materials. Use building materials which will act as insulators or conductors, depending on energy needs.	Section 6.5.13, <i>Sustainable Features</i> , supports sustainable building and the use of sustainable building materials. This may include materials that would act as insulators or conductors, depending on energy needs.
DG-46 Authentic Materials. Use authentic materials with a substantial appearance, including natural stone, brick, masonry, tile, wood shingles, metal panels, and glass panels. Avoid using inauthentic materials that have the appearance of thin veneer or attachment such as scored plywood, vinyl, and aluminum siding. If used, inauthentic materials should not be the dominant façade material and should not be used for detailing or ornamentation.	The Specific Plan promotes high-quality, authentic materials in Section 6.2, <i>Design Objectives</i> , Section 6.3.9, <i>Architectural Style and Development Aesthetics</i> , Section 6.4, <i>Architectural Foundation</i> , Section 6.4.2, <i>Materials and Treatments</i> , and Section 6.5.6, <i>Private Open Space</i> . Recommended materials include, but are not limited to, stucco, stone, glass, metal, wood or composite material, and concrete.
DG-47 Architectural Styles. No particular architectural style is mandated for any area in Mission Valley. However, design should: <ul style="list-style-type: none"> • Be sensitive to the context and the surroundings without necessarily conforming to the architectural styles of surrounding development. • Consider and respect the architectural features and styles of adjacent buildings and the surrounding district. Provide compatible or complementary features through architectural details, materials, colors, and lighting. In particular, draw on adjacent or nearby building features that are desirable to achieve compatibility. 	<p>The Riverwalk Specific Plan includes the following discussion relative to architectural styles:</p> <p><i>A variety of architectural styles and building materials are envisioned for Riverwalk. Different architectural styles are encouraged and are intended to co-exist in the overall Specific Plan to provide for independent and distinct neighborhood character and identifying elements. The use of a variety of building materials provides additional opportunity to create distinctive elements within each District and to lend an air of authenticity and timelessness to neighborhood development.</i></p> <p><i>The building aesthetics within each of the Districts should complement each other, without resulting in homogeneity. This may include having similarly sized massing elements, materials, or overall building character. The buildings should feature enhanced and high-quality materials to encourage pedestrian activity and visual interest. The ground plane and the first floor of each building should be enhanced through architectural details, street furniture, and other amenities.</i></p> <p><i>Because architectural style is constantly changing, the type of architecture within a particular planning</i></p>

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	<p><i>District will be determined at the time a given parcel is brought forward for development. The type of architecture ultimately selected for each parcel will depend on market trends and design styles at the time of development. However, all buildings will adhere to cohesive design elements, such as quality building materials and similar landscape palette, to create cohesion and aesthetic harmony throughout. This Specific Plan encourages distinct architectural styles that address project- and District-specific identities as an integral component of placemaking.</i></p>
<p>DG-48 Color. <i>Employ a color palette that reinforces building identity and complements changes in plane. The body of the building should generally be muted and light in tone to reduce heat gain. Bright colors should be used as accent colors only. A coordinated palette of complementary colors should be used rather than a patchwork of competing colors.</i></p>	<p>The Riverwalk Specific Plan promotes unity through consistent and/or complementary color palettes. However, the Specific Plan does not determine a specific color palette, so as to not create a monotonous appearance. The following policy and excerpts are included in the Specific Plan:</p> <ul style="list-style-type: none"> • <i>Policy-12. Paths, walkways, and buildings should include a variety of materials and colors to create visual interest and encourage a higher level of use.</i> • <i>Consistent architectural themes will be emphasized throughout the elements of design, color, materials, and finish, as well as signage and landscaping.</i> • <i>However, a single color scheme, massing approach, materials, and/or architectural style shall be avoided, as these differentiations provide identity to buildings and neighborhoods and help to create a timeless sense of place.</i>
<p>DG-49 Family-Oriented Housing. Design family-oriented housing and units for a range of ages. Opportunities include:</p> <ul style="list-style-type: none"> • Situate family-oriented units on lower floors to maximize accessibility for children and elderly. • Provide adequate storage space and design entryways that are visible from inside the home with wider hallways to accommodate stroller and bicycles, etc. 	<p>The Riverwalk Specific Plan includes amenities that would be attractive to families, including children's play areas, multi-purpose courts, and ball fields within park elements. Additionally, the proximity of housing to transit and employment, as well as zoning that allows for child care facilities as a limited use, would make Riverwalk a potential destination for families to locate.</p>
<p>DG-50 Views. Take advantage of views to the San Diego River, hillsides, and other natural features in design, particularly for living areas.</p>	<p>The Riverwalk Specific Plan includes discussion of views and view corridors in Section 3.5, <i>Site Planning and View Corridors</i>. View corridors are considered both within the Specific Plan area and also into the site from adjacent roadways (Figure 5.3-4, <i>Riverwalk View Corridors</i>). These are views as seen by pedestrians, from automobiles and transit, and other individuals passing by the property at the street level. Most of the views from I-8 are obscured by existing development. The Riverwalk Specific Plan would</p>

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	<p>additionally afford views from the north and south into the Riverwalk River Park. Views of other elements of Riverwalk's open space system include emphasis on view corridors from Friars Road through the development parcels of the North District and Central District toward the San Diego River. A major view corridor into the San Diego River would be provided from Fashion Valley Road. Section 3.5.2, <i>Views and View Corridors</i>, of the Riverwalk Specific Plan includes the following additional discussion:</p> <p><i>The placement and orientation of buildings should reflect the visual corridor objectives by organizing in a pattern which emphasizes these focal points. Providing interior view opportunities defines the urban character of Riverwalk through a variety of spaces linked by walkways and plazas, and articulated by overhead structures that frame views and create a changing spatial experience for pedestrians. Tree-framed view corridors are encouraged.</i></p>
<p>DG-53 Safety and Security. Integrate features that enhance security such as timed lighting and windows that look out onto pedestrian paths. Avoid using bars or security grills on windows and doors.</p>	<p>The Riverwalk Specific Plan does not contemplate the use of bars or security grills on windows or doors for safety and security. Rather, the Specific Plan would implement CPTED principles of passive security by collocating a variety of uses to create 24-hour life in the Specific Plan area. The locations of residential use throughout the Specific Plan area would create eyes on the street for both formal circulation elements, as well as paths within the Riverwalk River Park adjacent to development areas.</p>
<p>DG-54 Frontages. Articulate frontages to differentiate residential units from each other and from the overall massing. Incorporate porches, stoops, recessed windows, bay windows, accordion/roll-up doors, and balconies to provide visual interest (see Figure 29 of the Mission Valley Community Plan).</p>	<p>Frontages are addressed in Section 6.4.6, <i>Activated Interfaces</i>, as well as Section 6.6, <i>District Specific Guidelines</i>, of the Riverwalk Specific Plan.</p>
<p>DG-55 Residential Windows. Design windows to highlight the uses within. In residential areas on upper stories, for example, smaller windows allow more privacy.</p>	<p>Windows are anticipated by the Riverwalk Specific Plan to provide natural light and ventilation. Windows at the ground level would allow for transparency, particularly where facing the River Corridor Area. The Riverwalk Specific Plan would not preclude the design of individual buildings to take into account window location and size to address building-specific privacy concerns.</p>
<p>DG-56 Ground Floor Private Open Spaces. To ensure privacy and sunlight access, provide partially transparent screening or landscaping for open spaces</p>	<p>Private open space is addressed in Section 6.5.6, <i>Private Open Space</i>. Private open space would be demarcated from the public realm and would be</p>

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facing a public street, such as tall grasses and fences with openings.	constructed with building materials such as, but not limited to, stucco, stone, glass, metal, wood, or concrete. Reg-75 requires private recreational space and urban plazas to be visually or physically linked to the greater open space network.
DG-57 Separation from Shared Open Space. Separate private open space from common open space with low walls or fencing.	Ground floor activation is promoted throughout the Riverwalk Specific Plan. Specifically, this is addressed in Section 6.4.6, <i>Activated Interfaces</i> .
DG-58 Active Uses. Prioritize active uses on the ground floor.	The Riverwalk Specific Plan would develop as an integrated mix of compatible and complementary uses that would be mutually supportive and reinforcing of each other. Residential uses would provide employees and customers for the various non-residential components. The various non-residential components would contribute to demand for on-site residential use. These uses together would create 24-hour life throughout the Specific Plan area with mutual benefit for all uses.
DG-60 Compatibility of Uses. Maximize compatibility and mutual benefit in the mix of uses. Retail use should be generally limited to the ground-floor spaces along the street.	Ground floor activation, including windows, are addressed throughout the Riverwalk Specific Plan, and specifically within Section 6.4.6, <i>Activated Interfaces</i> . Activated interface regulations address storefront windows, as well as residential lobbies and ground floor patios/sidewalk cafés, which would enliven the street and provide for pedestrian views and interaction.
DG-61 Ground Floor Windows. Consider installing operable windows or stacking doors that allow the full length of the storefront to be opened to the sidewalk. At the street level, storefront windows should enliven the street and provide pedestrian views into the interior.	<p>The Riverwalk Specific Plan includes the following policies and regulations relative to sustainable building and site design:</p> <ul style="list-style-type: none"> • <i>Policy-77. Consider re-use of building materials, materials that have post-consumer recycled content, and materials that are derived from sustainable or rapidly renewable sources.</i> • <i>Policy-78. Low-wattage and/or LED light features, lighting controls, zoned lighting banks, and time-controlled lighting for public areas should be used.</i> • <i>Policy-80. Strive for innovative site design and building orientation to reduce energy use by taking advantage of sun-shade patterns, prevailing winds, landscaping, and sun-screens.</i> • <i>Reg-123. Design buildings that meet CALGreen, California Green Building Standards Code.</i> • <i>Reg-124. Design for convenient waste segregation and management, including recycling and composting, in order to meet State and local zero waste management requirements.</i>
DG-62 Sustainable Materials. Where possible, use sustainable building materials. Incorporate recycled, renewable, sustainable, and non-toxic/ low-VOC (volatile organic compound) materials. Use of locally harvested and/or manufactured materials is desired.	

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<p>DG-63 Sustainable Landscaping. Provide attractive and context-sensitive on-site landscaping that minimizes heat gain, is drought-resistant, requires minimal irrigation by:</p> <ul style="list-style-type: none"> Planting deciduous trees on the south side of buildings to shade the south face and roof during the summer while allowing sunlight to penetrate buildings in the winter. Exploring vegetation on the exposed east and west facing walls. Planting groundcovers that prevent ground reflection and keep the surface cooler, preventing re-radiation. Building roof gardens, eco-roofs, or other vegetated roof systems to help reduce the solar heat gain of building roofs and to serve as shared open space. Minimizing impervious surfaces that have large thermal gain. 	<ul style="list-style-type: none"> <i>Reg-125. Construct and operate buildings using materials, methods, and mechanical and electrical systems that promote a healthful indoor air quality.</i> <i>Reg-126. The use of low-flow shower heads and faucets, low-flow toilets, cycle adjustment dishwashers, pressure regulators, hot water pipe insulation or instantaneous water heaters, and standard water meters connection pipe sizes (no oversizing).</i> <i>Reg-127. Ground-mounted solar arrays are prohibited.</i> <p>The Riverwalk Specific Plan includes the following policies and regulations relative to sustainable landscaping practices:</p> <ul style="list-style-type: none"> <i>Policy-79. Incorporate sustainable landscape design and maintenance.</i> <i>Policy-80. Increase the city-wide urban tree canopy by providing a broad range of trees in a hierarchy of locations throughout Riverwalk, when feasible. Consider trees that have greater carbon sequestration.</i> <i>Policy-81. Consider high efficiency irrigation technology and recycled water, when available, to reduce the use of potable water for irrigation.</i> <i>Policy-82. Low-water-use plant material, automatic sprinkler systems with timers, and drip-irrigation systems are encouraged.</i> <i>Reg-128. Utilize trees to maximize energy efficiency. Place evergreen trees in surface parking lots to diminish heat island effect.</i> <i>Reg-129. Incorporate water conservation measures in site/building design and landscaping.</i>
<p>DG-64 Water Efficiency and Conservation. Install water saving appliances and systems such as gray water systems, moisture-sensitive irrigation rainwater cisterns, and low-flow toilets and faucets. Any exterior systems should be integrated into building design.</p>	<p>The Riverwalk Specific Plan encourages sustainable development, to include development that takes into account water efficiency and conservation. Additionally, the Riverwalk Specific Plan includes the following regulations relative to water efficiency and conservation:</p> <ul style="list-style-type: none"> <i>Reg-103. The use of turf is regulated by the Water Conservation section of the Landscape Regulations (LDC Section 142.0413), which limits use to 10 percent of the landscape areas on a premises, excluding required common areas, active recreation areas, and areas located in the public right of way between the curb and the sidewalk. At thematic entries, use of turf is limited to 50 percent of the entry area, and may not exceed the 10 percent allowed on the premises.</i> <i>Reg-126. The use of low-flow shower heads and faucets, low-flow toilets, cycle adjustment dishwashers,</i>

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	<p><i>pressure regulators, hot water pipe insulation or instantaneous water heaters, and standard water meters connection pipe sizes (no oversizing).</i></p> <ul style="list-style-type: none"> • <i>Reg-129. Incorporate water conservation measures in site/building design and landscaping.</i>
<p>DG-65 Storm Water Capture and Treatment. Ensure the design of new development integrates storm water best management practices on site to maximize their effectiveness by:</p> <ul style="list-style-type: none"> • Allowing the use of green roofs and water collection devices, such as bioswales, cisterns, and rain barrels, to capture rainwater from the building for re-use. • Utilizing disconnected drain sprouts to interrupt the direct flow of rain-water from the buildings to the storm water system. Integrate these features to imbibe buildings with a distinctive architectural character. • Minimizing on site impermeable surfaces, such as concrete and asphalt. Utilizing permeable pavers, porous asphalt, reinforced grass pavement, cobble stone block pavement, etc. to detain and infiltrate runoff on-site. • Encouraging the use of permeable paving elements in auto and non-auto-oriented areas. 	<p>The Riverwalk Specific Plan incorporates storm water capture and treatment through the implementation of Low Impact Development (LID) measures, as discussed in Section 6.5.13, <i>Sustainable Features</i>. The LID principles, guidelines, and BMPs would be <i>incorporated during the planning, design, implementation, and maintenance of the public spaces throughout the project. In particular, planting areas within parks, on slopes, and along trails would be designed to incorporate stormwater management BMPs to slow, infiltrate, and cleanse stormwater. Trails and hardscape features within the public realm would be designed with permeable paving materials, where appropriate, such as porous concrete, porous asphalt, interlocking pavers, decomposed granite, or similar treatments to promote stormwater infiltration and reduce stormwater discharge.</i></p>
<p>DG-68 Carbon Sequestration. Incorporate new trees into site plans that have the potential for storage and sequestration of high levels of carbon.</p>	<p>As described in Section 5.1, <i>Land Use</i>, of this EIR, the Riverwalk Specific Plan would conservatively double the tree canopy percentage on the project site. This increased tree canopy, in addition to other project landscaping, would result in increased carbon sequestration.</p>
<p>DG-69 Zero Net Energy Buildings. Strive for zero net energy in a building design.</p>	<p>Development of the Riverwalk Specific Plan would be consistent with Title 24 and would adhere to the various sustainable policies of Section 6.5.13, <i>Sustainable Features</i>.</p>
<p>DG-70 Maintenance. Develop long-term maintenance for all vegetation to be in accordance with adopted City-wide landscape standards.</p>	<p>The Riverwalk Specific Plan includes a discussion of maintenance responsibilities in Section 7.7, <i>Maintenance Requirements</i>. Maintenance within Riverwalk is broken into parkways and public areas (Section 7.7.1), to include public parks, and private development landscaped areas (Section 7.7.2). Responsibilities are clearly discussed in Section 7.7 and illustrated in Figure 7-3 of the Riverwalk Specific Plan to ensure that proper maintenance occurs.</p>
Area-Specific Design	
<p>DG-71 Station Arrival Plaza. Incorporate an arrival plaza as a visual gateway. Include public art,</p>	<p>Relative to the transit stop plaza, the Riverwalk Specific Plan offers the following description and regulations:</p>

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<p>landscaping, lighting, and pavers to the station and plaza design.</p>	<p><i>The retail/trolley area that makes up the mixed-use center of the North District is intended to be one of Riverwalk's primary entryways and, as such, represents a front door of the neighborhood and window to the public's arrival at Riverwalk via mass transit or passing through on the way to a destination beyond. Riverwalk's Green Line Trolley transit stop and mobility hub serves Riverwalk's residents, as well as the adjacent retail spaces and the Riverwalk River Park and will provide connections to the surrounding communities. The transit stop and mobility hub are integrated with the retail area and provide activated uses fronting on to the north side of the platform. The south side of the platform opens out to the San Diego River and the Riverwalk River Park, offering expansive and stunning views of the Riverwalk River Park, Mission Hills, and the entire south mesa in the distance. The proximity of the retail and park space to the transit stop offers an experience truly unlike any other in San Diego.</i></p> <ul style="list-style-type: none"> • Reg-165. The transit/trolley stop and mobility hub shall be activated by plazas and/or paseos, and enhanced landscaping, or other features that encourage pedestrian activity and visual interest. • Reg-185. The design of the transit/trolley stop shall be activated through the use of plazas and/or paseos and landscaping. <p>Actual station design and amenities would be coordinated with MTS when development of the transit stop occurs.</p>
<p>DG-72 Station Amenities. Improve the experience of trolley riders by providing a range of amenities at each trolley station. Amenities may include bike parking, benches, substantial overhangs and/or awning, shelters, information kiosks, public restrooms, and other trolley rider-serving amenities.</p>	<p>The transit/trolley stop would include amenities. Actual station design and amenities would be coordinated with MTS when development of the transit stop occurs.</p>
<p>DG-73 Mobility Hubs. Design areas around trolley stations to provide for a range of services that can improve first-last mile connections. This includes drop-off/pick-up areas for ride-hailing and shuttle services, space for scooter- and bike-share storage, parking spaces dedicated to car-sharing services, charging stations, and package pick-up areas.</p>	<p>Relative to a mobility hub, the Riverwalk Specific Plan includes the following description and policy:</p> <p><i>The mobility hub is a place of connectivity where different modes of travel – walking, bicycling, transit, and shared mobility – seamlessly converge. It provides an integrated suite of mobility services, amenities, and technologies to bridge the distance between high-frequency transit and an individual's origin of</i></p>

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	<p><i>destination. Sample mobility hub services, amenities, and technologies include: bikeshare, carshare, neighborhood electric vehicles, bicycle parking, dynamic parking management strategies, real-time traveler information, real-time ridesharing, microtransit services, bicycle and pedestrian improvements, wayfinding, and urban design enhancements.</i></p> <ul style="list-style-type: none"> • <i>Policy-69. The transit/trolley stop will be part of a mobility hub and will provide access to and from buses, the trolley, and paths, trails, and sidewalks that serve the neighborhood and the region. The facility will include multiple mobility options, such as bicycle lockers/racks, scooter and bicycle rental, automobile drop-off/pick-up, rideshare, and other forms of transportation options. The transit/trolley stop will be architecturally and functionally integrated into the design of the community.</i>
<p>DG-74 Mix of Uses. Promote vertically and horizontally mixed uses within the trolley areas. Enhance livability and neighborhood vitality by providing a range of uses that serve visitors, workers, and residents.</p>	<p>Section 6.3.7, <i>Mixed-Use Core/Retail/Transit/Trolley Stop</i>, of the Riverwalk Specific Plan includes the following guidance specific to the transit stop and the mix of uses that would occur there.</p> <p><i>The character of this area is envisioned to be a mix of office and retail uses on the ground level, fronting the streets and public spaces such as plazas. While residential use is not precluded from the ground level in this area, in order to promote enlivenment throughout the day, residential uses should include active elements such as ground floor private open space and/or direct access to the public realm as described in Section 6.3.6, Building to Street Relationship, of the Riverwalk Specific Plan. Above the first floor, a mix of office and residential, depending upon market conditions, is encouraged to contribute to the 24-hour life of the mixed-use core, which supports place-making and adds passive security. The combination of uses and emphasis on ground level activation will create a vibrant and inviting neighborhood. Should residential be included on the ground floor, emphasis shall be added to energize the pedestrian-level through patios and plazas, ground floor entries to individual units, and patio spaces interspersed into the public interface.</i></p> <p><i>The community-serving retail, boutique office, and public space, such as plazas, are central to providing a</i></p>

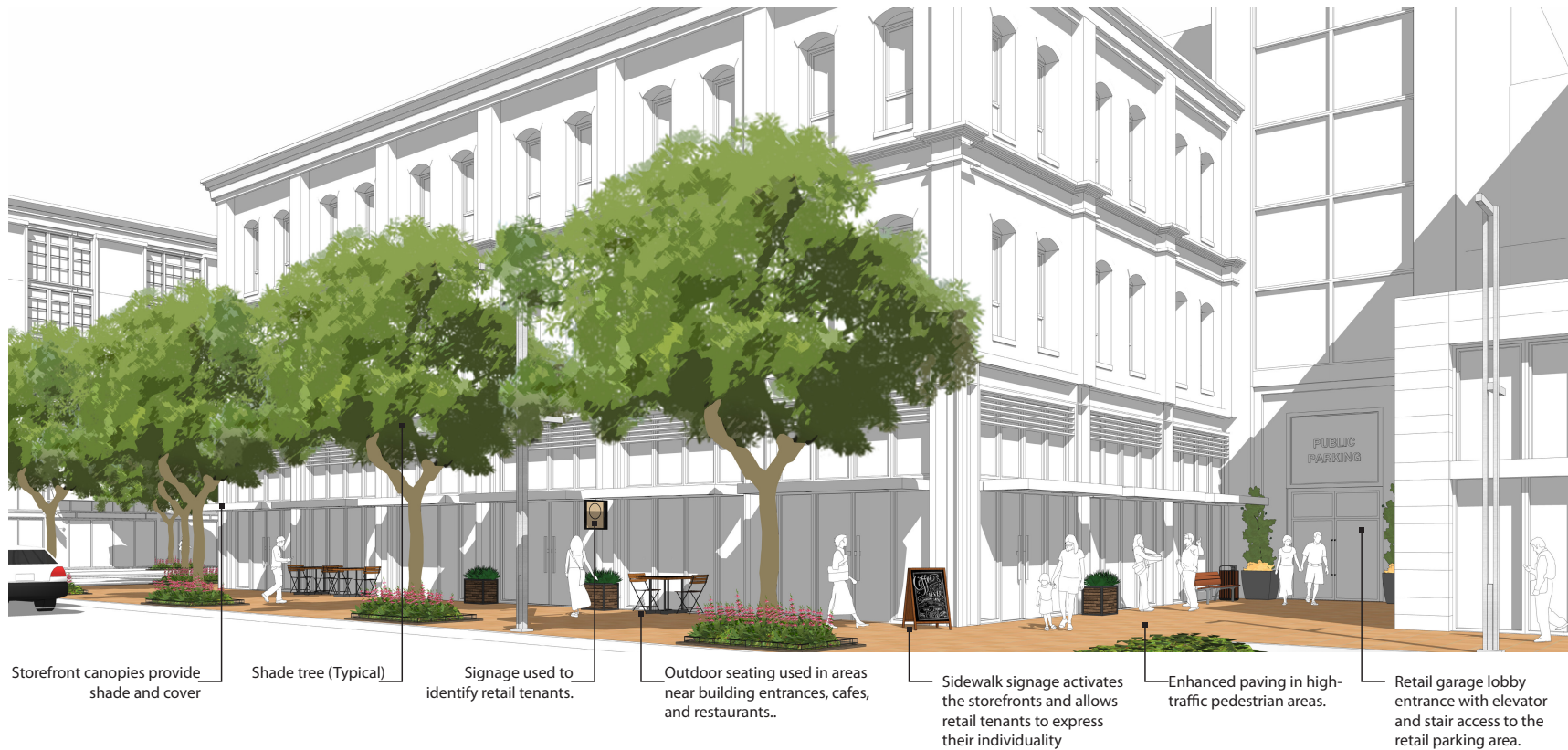
Mission Valley Community Plan Design Guideline	Riverwalk Specific Plan Application.
	<p><i>neighborhood heart in this location and offers an exciting new destination for visitors and residents. This mixed-use core is also accessible via the north-south entry procession from Friars Road, which takes visitors through a well-landscaped retail street defined by storefronts, wide, tree-lined sidewalks, and public seating and gathering spaces. This street continues to the public plaza that serves as the neighborhood's central gathering area. Beyond the plaza is the transit stop and mobility hub, with its surrounding mix of retail, office, and residential uses.</i></p>
<p>DG-75 Identifiable Style. Encourage building design in each trolley station area to exhibit an identifiable architectural style.</p>	<p>It is the intention of the Riverwalk Specific Plan that all buildings would be unified through the use of high quality materials and similar landscape palette. The buildings incorporated into the transit stop would be consistent with this design aesthetic resulting in a transit station area that has a unique identity.</p>
<p>DG-76 Walkable Blocks. Explore opportunities for large site redevelopment to reduce existing block scale by establishing new streets and/or public pedestrian pathways. Block faces longer than 350 feet should provide mid-block crossings to achieve a fine-grained street grid.</p> <ul style="list-style-type: none"> • Design direct and attractive pedestrian routes and pathways to connect trolley stations, local destinations, activity centers (retail core, plaza, etc.), and the surrounding neighborhood. • Avoid meandering paths or any treatment that would unnecessarily obstruct the view to the trolley station. • Design pedestrian routes to prioritize public right-of-way. Routes across private land should be open to the public at all time and be clearly marked for public use. 	<p>Development of Riverwalk would include the creation of a general grid pattern of streets, as shown in Figure 3-8 of this EIR. As shown in Figure 3-4 of this EIR, pedestrian facilities are located along the majority of project streets, as well as within green spaces and park elements. Direct connectivity would be provided to the mixed-use core/transit stop, as well as other residential, commercial, employment, and recreational features of the project.</p>
<p>DG-77 Wayfinding. Locate directional signage at key locations such as major intersections and trail access points to direct people to trolley stations.</p>	<p>Wayfinding would be provided, as appropriate, to direct users to the transit stop. Additionally, the Riverwalk Specific Plan includes specific guidance for wayfinding relative to the Special Treatment Area - Fashion Valley Road Interface, as well as within the Central District, as described in Section 6.6, <i>District Specific Guidelines</i>, of the Riverwalk Specific Plan. Actual locations of directional signage would be determined when development comes forward.</p>
<p>DG-78 Orientation of Development. Within Community Nodes, design site plans with buildings facing, and paths leading toward, the Node's "center of gravity."</p>	<p>The transit stop and its surrounding development would function as the Community Node for Riverwalk. As described in Section 6.3.7, <i>Mixed-Use Core/Retail/Transit/Trolley Stop</i>, buildings and pedestrian amenities would be oriented toward this location. The</p>

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	mixed-use core's role as Riverwalk's "center of gravity" would be further reinforced by the mixture of uses, including residential, retail, and employment uses.
DG-79 Main Street Facades. Strive to achieve a "street wall" effect along Main Streets. Incorporate pedestrian-only paths or alleys to parking areas, open space, or rights-of-way to the rear.	Riverwalk's internal spine road within North District (Street 'D1', 'D2', and 'E') would function as the project's "Main Street". Street, retail, and park activation, as described in Section 6.4.6, <i>Activated Interfaces</i> , of the Riverwalk Specific Plan would reinforce the ground plane, include pedestrian-focused design elements, and orient building entrances toward this street.
DG-80 Gateway Features. Incorporate a signature architectural element, public art, or other gateway features at the end of a Main Street or at the center of a Node to enforce the identity of the area provide a recognizable feature.	Section 6.5.8, <i>Monumentation and Community Signage</i> , of the Riverwalk Specific Plan addresses community gateway signage as a distinct identifier for Riverwalk. A total of <i>two prominent, statement gateway signs may be provided within Riverwalk: one north of the San Diego River and one south of the San Diego River. These gateway signs may span an internal roadway, similar to the Hillcrest sign in the Hillcrest neighborhood of the Uptown community, or be located within a central median, such as the Civita sign in the Civita neighborhood of Mission Valley. Materials and landscaping utilized in concert with these signs should be of the highest quality, as these gateway signs set the tone for the entire Riverwalk community.</i>
DG-81 Pedestrian Scaled Articulation. Incorporate pedestrian-scaled façade articulation to create an active and inviting public realm, create visual interest and diversity, and reinforce the pedestrian scale and character of main roadways and pedestrian paths.	Section 6.4.6, <i>Activated Interfaces</i> , of the Riverwalk Specific Plan includes regulations for pedestrian-scaled development throughout the Specific Plan area. Activated interfaces would occur in the North, Central, and South Districts; along the Park District interface with the Central and South Districts; and along Fashion Valley Road.
DG-82 Amenities. Provide amenities for public use, including benches, overlooks, drinking fountains, public bathrooms, and bicycle parking. Amenities may be shared with adjacent public facilities such as transit stations and public parks, per the San Diego River Park Master Plan.	As described in Section 3.2.1, <i>Riverwalk River Park</i> , and Section 6.5.16, <i>River Corridor Area</i> , pedestrian amenities within park elements would include seating and benches, restrooms, bicycle racks, and nature viewing areas.
DG-83 Pavers. Wherever possible, pave all multi-use portions of the trail. Trail segments may be unpaved when they lead off to interpretive overlooks or when paving may negatively impact sensitive habitats.	As described in Section 6.5.16, <i>River Corridor Area</i> , trails within the Riverwalk River Park would either be concrete or decomposed granite.
DG-84 Overlooks. Create overlooks at viewpoints or at nodes where north-south connection to a community meets the San Diego River Pathway. Overlooks may include amenities such as picnic tables, interpretive signs, and seating according to the size of the space.	As described in Section 3.2.1, <i>Riverwalk River Park</i> , and Section 6.5.16, <i>River Corridor Area</i> , pedestrian amenities within park elements would include nature viewing areas/overlooks, picnic areas, shade structure, seating, and educational signage/kiosks.

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DG-85 Shading. Ensure adequate shading at various portions of the trail throughout the day. Shading provided by trees is more desirable than shadow cast by adjacent development.	Landscaping within the Riverwalk River Park, which includes the San Diego River Pathway, would include groundcover, shrubs, and trees. The planting palette would ultimately be determined through the GDP process and would include shade trees for enjoyment of trail users.
DG-86 River Presence. Emphasize the location and presence of the river corridor by creating view corridors to the river within development projects and extending landscaping of the riparian corridor—both native trees and understory vegetation—through to the project site.	Section 3.5.2, Views and View Corridors, of the Riverwalk Specific Plan discusses the creation of view corridors through the site to the San Diego River from the north, east, and south. Figure 5.3-4 of this EIR illustrates those view corridors.
DG-87 Building Access. For development that abuts the River Corridor Area, provide the following: a primary façade and entrance oriented towards the River Corridor Area; and a pedestrian path from the river side of the building to the San Diego River Pathway that utilize the same materials as the primary entrance.	<p>Section 6.5.17, <i>River Influence Area</i>, addresses building facades and entrances within the River Influence Area:</p> <p><i>Development that abuts the River Corridor Area shall provide a river-fronting facade and entrance that are of substantially equivalent design and quality of materials as the primary building facade and entrance to the satisfaction of the City Manager.</i></p> <p>Pedestrian access from buildings toward the River Corridor Area is addressed in the <i>Access to the River Corridor Area from the River Influence Area</i> subsection of the Riverwalk Specific Plan Section 6.5.17, <i>River Influence Area</i>.</p>
DG-88 Streets. Where appropriate along the river, locate public streets adjacent to the river corridor area so as to orient the buildings naturally toward the river. This eliminates the necessity for long lengths of fencing along private property.	<p>With the exception of small segments of Riverwalk Drive, the Specific Plan does not include public streets adjacent to the River Corridor Area. Instead, Riverwalk would orient buildings (and building entrances) and park elements toward the river to incorporate the river as a feature of the project, to promote pedestrian use, and to avoid lengths of fencing along private property along the river. To promote this interface, Section 6.5.17, <i>River Influence Area</i>, include the following regulation:</p> <p><i>Development that abuts the River Corridor Area shall provide a river-fronting facade and entrance that are of substantially equivalent design and quality of materials as the primary building facade and entrance to the satisfaction of the City Manager.</i></p>
DG-89 Crosswalks. At intersections adjacent to the River Corridor Area, consider crosswalks of a different paving material and color than the street, bulb-outs to help ease traffic, signaling that counts down time to	Street 'S' of Riverwalk Drive would be located within the River Corridor Area. Access to the San Diego River Pathway would be provided at the intersection of Riverwalk Drive and Fashion Valley Road. Crosswalks may be provided at additional locations adjacent to

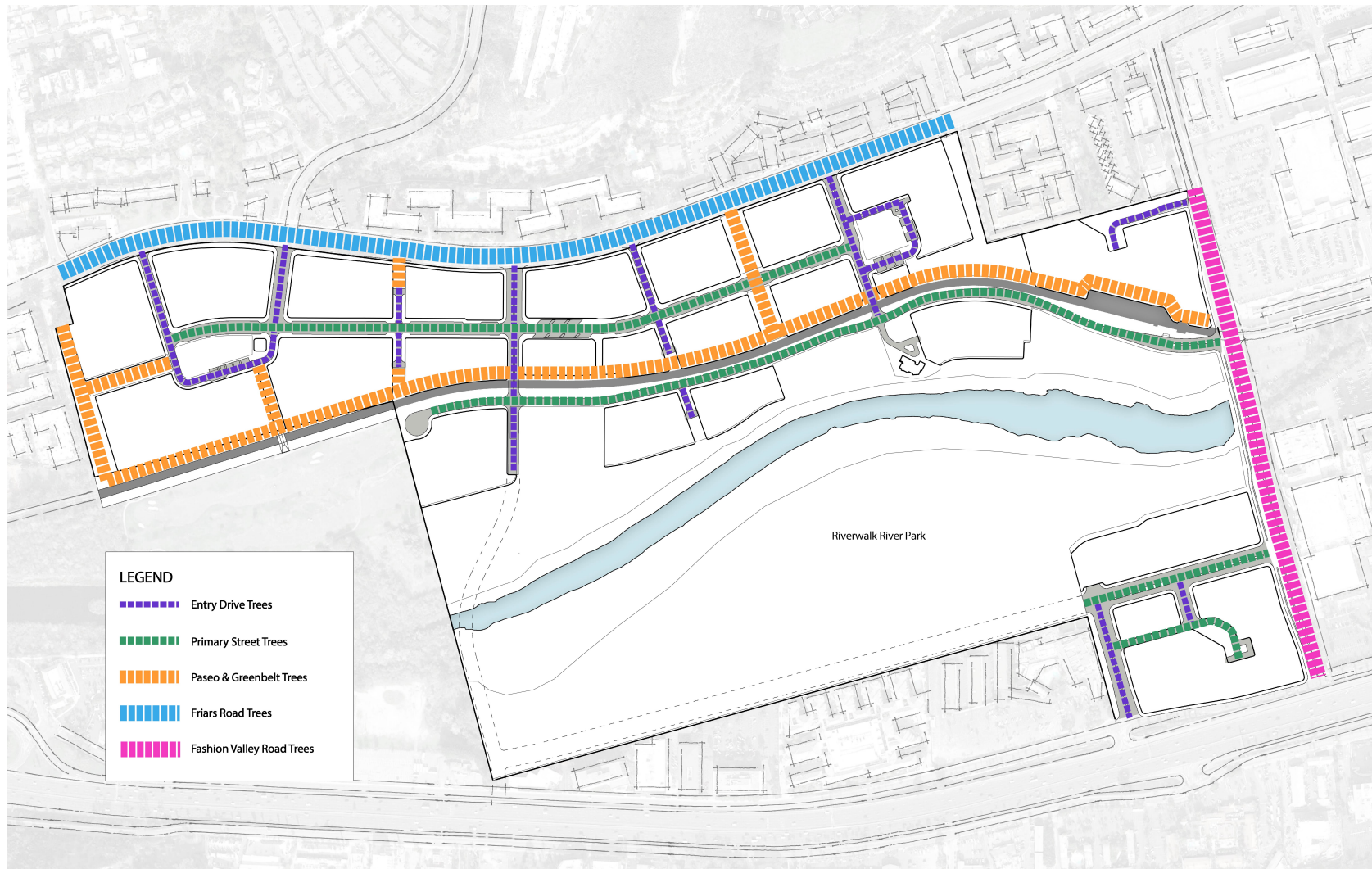
Mission Valley Community Plan Design Guideline	Riverwalk Specific Plan Application.
cross, and raised crosswalks to match the level of the connecting sidewalk.	the River Corridor Area, which may incorporate such articulation elements as differentiated paving/color, bulb-outs, count-down signals, and/or raised crosswalks.
DG-90 Architecture. Along the River Influence Area, vary buildings in form and façade and avoid repetition in order to create visual interest and to help define view corridors. There should also be variety through roof form, recesses or extensions of the façade form, window and curtain wall patterns, shading devices, balconies, material changes, color variation, and surface pattern and texture changes.	Section 6.5.17, <i>River Influence Area</i> , of the Riverwalk Specific Plan includes specifications relative to massing and building façades and entrances within the River Influence Area. Window treatments, balconies, ground activation, and entrances would provide for variety along the River Influence Area.
DG-91 Transparency. Design building facades above the ground floor that front the River Corridor Area or a street that abuts and runs parallel to the area to be a minimum of 25 percent transparent. This includes glass windows, display windows, or windows affording views into customer services, offices, galleries, cafes, lobby spaces, or pedestrian entrances.	Section 6.5.17, <i>River Influence Area</i> , of the Riverwalk Specific Plan includes the following regulation relative to building transparency: <i>For building facades facing the San Diego River on buildings within the River Influence Area, oversized windows or balconies shall be provided for each residential unit. Ground floor activation, through resident amenities, retail, cafés, restaurants, resident entrances, building lobbies, or similar uses shall be provided along at least one building façade.</i>
DG-92 River-Adjacent Landscaping. Include sustainably grown wood products and 'green' materials with post-consumer recycled content in landscaping materials. This includes, but is not limited to, fencing, trellises, and hardscapes. Plant materials should frame and enhance views of the River Corridor Area.	River-adjacent landscaping would include native and native-friendly materials. Because the river-adjacent landscaping would line the river channel, it would frame and enhance views along and to the San Diego River. Fencing within the River Corridor Area that would prevent intrusion into the river channel may be sustainably grown wood products or made from green materials.
DG-107 Site Planning. In plans for large sites, locate taller buildings so that they act as buffers between residential uses and the freeway.	The Riverwalk Specific Plan limits building heights in the North and Central District to seven stories. Within the South District, adjacent to I-8, building heights may be up to 200 feet in height, which would buffer internal uses from the freeway.
DG-108 Freeway-Adjacent Landscaping (Buffers). Install ample landscaping adjacent to the freeway. This should include understory vegetation as well as trees.	As shown in Figure 3-5, <i>Conceptual Landscape Plan</i> , of this EIR, landscaping would be integrated into the South District, including along the southern boundary facing Hotel Circle North and I-8. Additionally, as described in Chapter 3.0 of this EIR, the north side of Hotel Circle North would be widened with the project by approximately 10 feet to accommodate a cycle track, parkway, and sidewalk. This space would allow for Hotel Circle North improvements to be implemented per the vision of the Mission Valley Community Plan, which would include a seven-foot landscaped parkway, providing further buffering.

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<p>DG-109 Noise Attenuation. Buffer residential development from noise with setbacks or elevation differences. Use noise-absorbing building materials and install double-paned windows. Incorporate landscaping materials, landscaped berms, and structural forms in wall design. Consider installation of sound walls where appropriate.</p>	<p>Residential development may occur within the South District, adjacent to I-8. Specific Plan Reg-196 prohibits residential balconies fronting I-8 where noise levels exceed 70 dBA CNEL. Interior noise would need to demonstrate meeting General Plan requirements as individual buildings come online.</p>



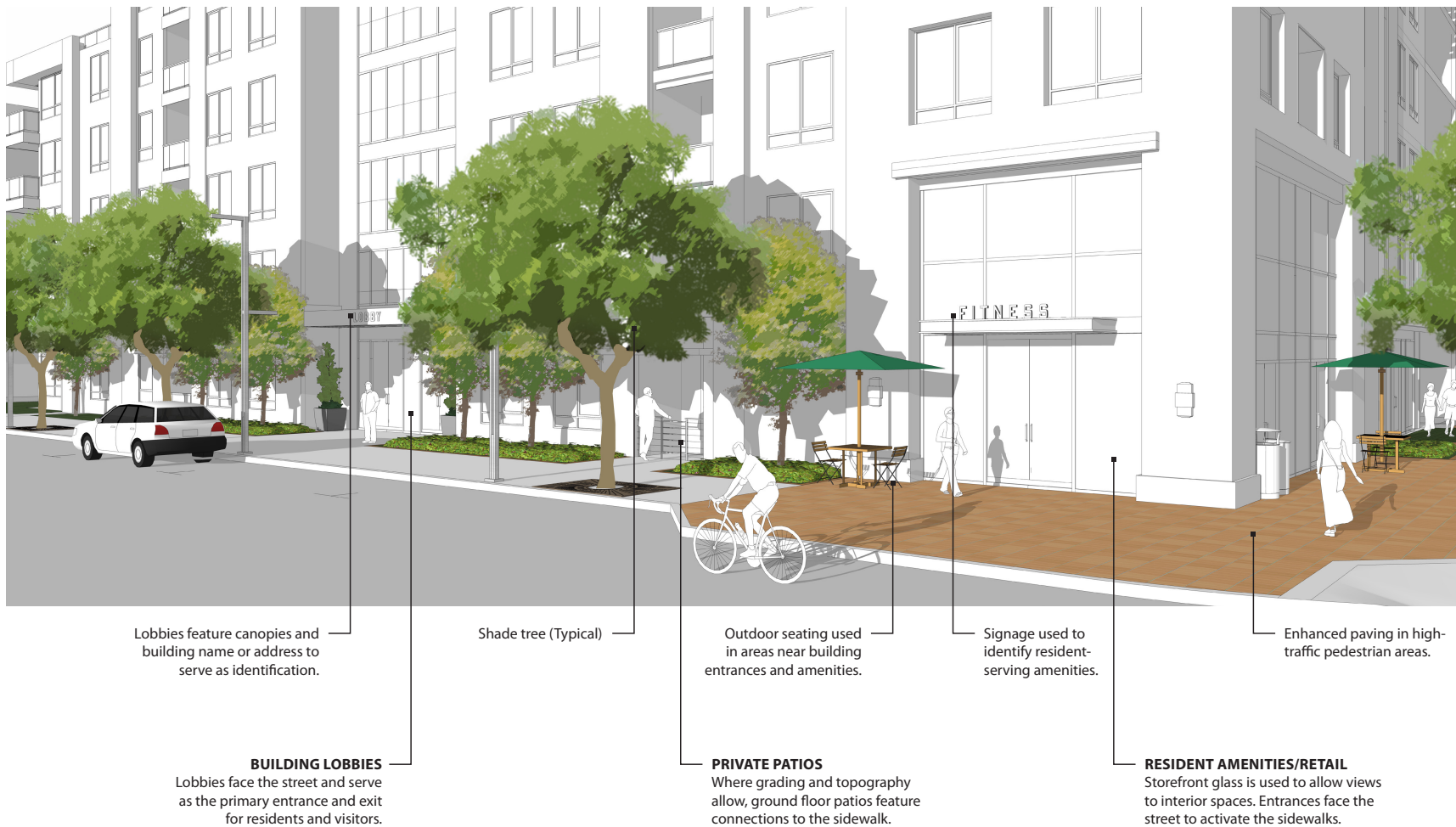
FOR ILLUSTRATIVE CONCEPT PURPOSES ONLY

Figure 5.3-1. Riverwalk Specific Plan Retail Activation Interface



Note: Trees shall be planted outside of the sewer and water easement.

Figure 5.3-2. Riverwalk Greenbelt and Street Trees



FOR ILLUSTRATIVE CONCEPT PURPOSES ONLY

Figure 5.3-3. Riverwalk Specific Plan Street Activation Interface

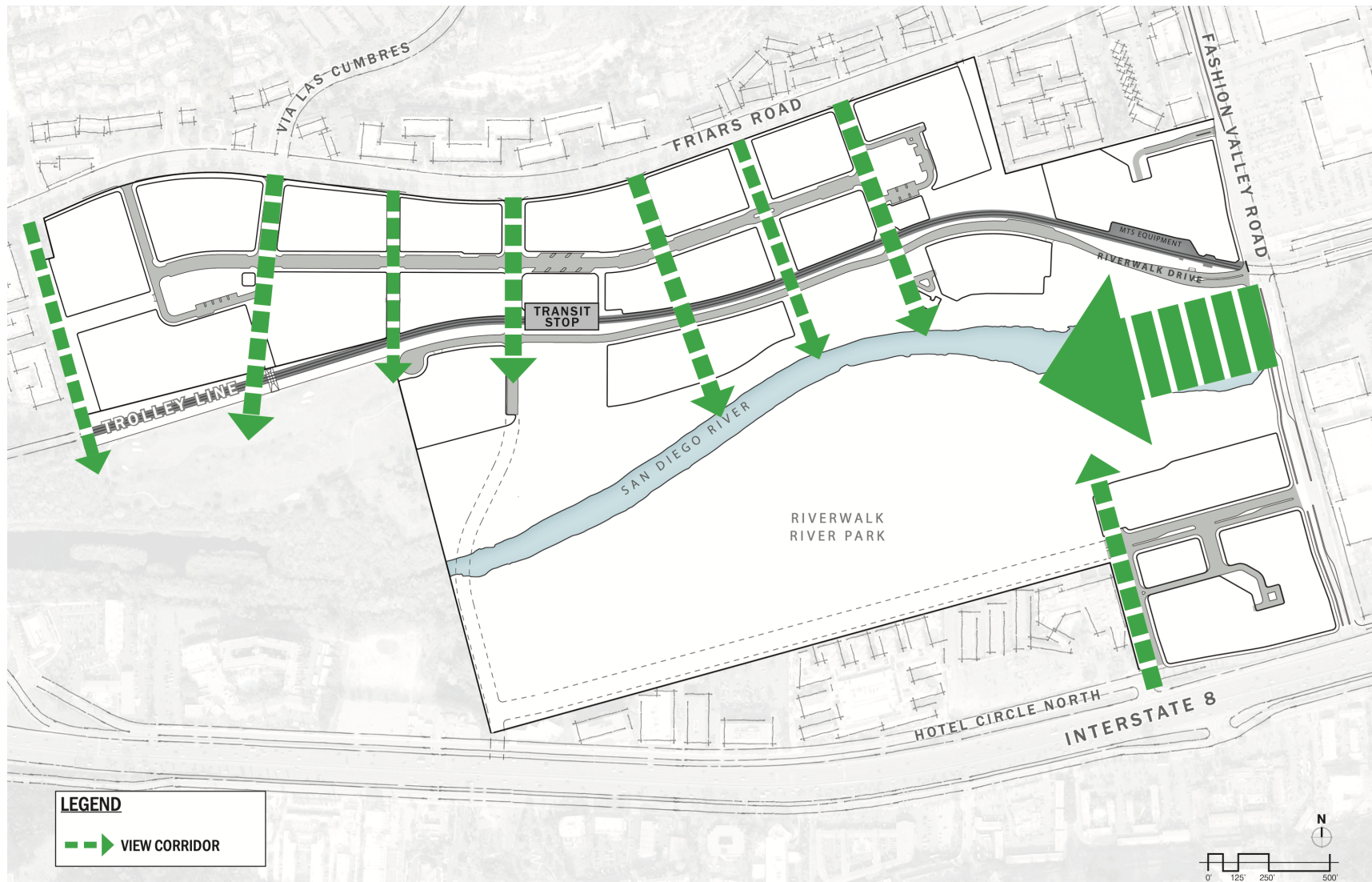


Figure 5.3-4. Riverwalk View Corridors

5.4 Biological Resources

This section evaluates the potential biological resources impacts associated with the Riverwalk project. The following discussion is based on the *Biological Technical Report*, prepared by Alden Environmental, Inc. (February 19, 2020), included as Appendix E of this EIR.

5.4.1 Existing Conditions

5.4.1.1 Physical Characteristics

The project site is dominated by the relatively flat topography of the existing Riverwalk Golf Course, with a slightly undulating landscape associated with the fairways, greens, and other associated golf course amenities. In addition, the site supports other urban land uses, including the trolley line, golf course clubhouse, maintenance facilities, and associated parking lot. The San Diego River passes through the site and is its only naturally occurring feature. The project site is located within the San Diego River Watershed and approximately half of the site is within the FEMA 100-year Flood Hazard Zone. Elevations on-site range from approximately 40 feet AMSL at the northeast portion of the site adjacent to Friars Road to approximately 20 feet AMSL at the central portion of the site along the San Diego River. Soils on-site consist (in approximately descending order of area) of Tujunga Sand (zero to five percent slopes), Riverwash, Heurhuero-Urban Land Complex (two to nine percent slopes), Grangeville Fine Sandy Loam (zero to two percent slopes), Quarries, Olivenhain-Urban Land Complex (two to nine percent slopes), Reiff Fine Sandy Loam (five to nine percent slopes), and Heurhuero-Urban Land Complex (nine to 30 percent slopes).

5.4.1.2 Multi-Habitat Planning Area

The MHPA was developed by the City in cooperation with the USFWS, CDFW, property owners, developers, and environmental groups using the Preserve Design Criteria contained in the MSCP Plan, and the City Council-adopted criteria for the creation of the MHPA. MHPA lands are large blocks of native habitat that have the ability to support a diversity of plant and animal life and, therefore, have been included within the City's Subarea Plan for conservation. The MHPA also delineates core biological resource areas and corridors targeted for conservation as these lands have been determined to provide the necessary habitat quality, quantity, and connectivity to sustain the unique biodiversity of the San Diego region. While MHPA lands are considered by the City to be a sensitive biological resource and intended to be mostly void of development activities, development is allowed in the MHPA subject to the requirements of the MSCP Subarea.

According to the City's MSCP Subarea Plan, the project site is an urban habitat area that includes the San Diego River in the MHPA (see Figure 5.4-1, *City of San Diego MHPA and Regional Corridor*). The Subarea Plan lists MHPA Guidelines for the San Diego River that are required to be implemented for take authorization of Covered Species. Guideline B15 is required to be met by the project and states:

Native vegetation shall be restored as a condition of future development proposals along this portion of the San Diego River Corridor.

5.4.1.3 Vegetation Communities

Nine vegetation communities/land cover types were mapped on the project site: southern cottonwood-willow riparian forest, disturbed southern cottonwood-willow riparian forest, southern willow scrub, disturbed southern willow scrub, coastal and valley freshwater marsh, emergent wetland, open water, disturbed land, and urban/developed land. The acreages of these communities are provided in Table 5.4-1, *Existing Vegetation Communities and Land Cover Types*, along with the upland habitat tiers, as defined by the City's Biology Guidelines (2018). Wetland/riparian communities are not assigned a tier. [Note: Jurisdictional areas (i.e. Basins A, B, and C) are shown in Figure 5.4-2, *Riverwalk Jurisdictional Areas*.]

Table 5.4-1. Existing Vegetation Community and Land Cover Types

Vegetation Community/Land Cover Type		Tier	Acreage
Wetland/ Riparian	Southern cottonwood-willow riparian forest	NA	4.45
	Disturbed southern cottonwood-willow riparian forest	NA	1.37
	Southern willow scrub	NA	3.37
	Disturbed southern willow scrub	NA	0.17
	Coastal and valley freshwater marsh	NA	3.08
	Emergent wetland ²	NA	0.14
	Open water	NA	0.89
Other Uplands	Disturbed Land	IV	6.95
Land Cover	Urban/Developed ²	NA	174.62
TOTAL			195.04

¹Wetland/riparian acreages rounded to the nearest 0.01.

²Includes vegetation in Drainage A established within man made (constructed) and maintained stormwater drainage feature.

Southern Cottonwood-willow Riparian Forest (including disturbed)

Southern cottonwood-willow riparian forest is a tall, predominantly deciduous, riparian forest that typically has an open canopy dominated by Fremont's cottonwood (*Populus fremontii*), black cottonwood (*P. trichocarpa*), various willow species (*Salix spp.*), and a dense understory dominated by scrubby willows and other shrubs. This vegetation community is found at low elevations along rivers and streams where the water table is high and/or where there is year-round water flow.

Southern cottonwood-willow riparian forest occurs along the San Diego River in the eastern and western portions of the project site. On-site, the southern cottonwood-willow riparian forest canopy is dominated by California sycamore (*Platanus racemosa*), western cottonwood (*Populus fremontii ssp. fremontii*), narrow-leaf willow (*Salix exigua var. exigua*), black willow (*Salix gooddingii*), red willow (*S. laevigata*), and arroyo willow (*S. lasiolepis*). The understory is composed of a mix of native and non-

native species, including curly dock (*Rumex crispus*), western ragweed (*Ambrosia psilostachya*), cocklebur, and California bulrush (*Schoenoplectus americanus*).

Disturbed southern cottonwood-willow riparian forest is similar to southern cottonwood-willow riparian forest as described above; however, it has been physically disturbed by previous human activity so that it still functions as southern cottonwood-willow riparian forest but normally does not provide as high habitat value as the undisturbed southern cottonwood-willow riparian forest.

On-site, disturbed southern cottonwood-willow riparian forest supports a few cottonwoods and willows; however, it is dominated by Canary Island date palm, Mexican fan palm, Brazilian pepper tree (*Schinus terebinthifolius*), and white alder (*Alnus rhombifolia*) with an understory that is dominated by poison hemlock (*Conium maculatum*), annual saltmarsh aster (*Symphyotrichum subulatum*), cocklebur, spear orache (*Atriplex patula*), castor bean, California wild rose (*Rosa californica*), Himalayan blackberry (*Rubus armeniacus*), and wild grape (*Vitis girdiana*).

Southern Willow Scrub (including disturbed)

Southern willow scrub is a dense, broad-leaved, riparian scrub community that typically grows on loose, sandy, or fine gravelly alluvium deposited near stream channels during floods. The canopy of this vegetation community is usually dominated by several willow species with scattered, emergent cottonwood and western sycamore. Most southern willow scrub stands are too dense to allow much understory to develop.

Southern willow scrub occurs along much of the San Diego River on-site in Drainage B. The southern willow scrub is dominated by narrow-leaf willow, black willow, red willow, arroyo willow, mule fat (*Baccharis salicifolia* ssp. *salicifolia*), and California bulrush.

Disturbed southern willow scrub occurs in a man-made drainage that carries urban runoff in the northeastern portion of the site (Drainage A). The habitat is considered disturbed because it is dominated by non-native plant species (i.e., Brazilian pepper tree and acacia) along with native arroyo willow. Furthermore, it is considered to have low habitat value because it is surrounded by golf course and is of very limited extent. Disturbed southern willow scrub also occurs in Drainage C in the southwestern portion of the site where it has been previously disturbed by human activity potentially due to adjacent golf course activities. While dominated by native plant species, non-native species are also present.

Coastal and Valley Freshwater Marsh

Coastal and valley freshwater marsh is dominated by perennial, emergent monocots measuring about five to eight feet in height and often forming a closed canopy. This vegetation community occurs in wetlands that are permanently flooded by standing fresh water.

Coastal and valley freshwater marsh occurs along much of the San Diego River on-site. Coastal and valley freshwater marsh on-site is dominated by alkali bulrush (*Bolboschoenus maritimus*), California

bulrush, six-petal water primrose (*Ludwigia hexapetala*), herb of grace (*Bacopa monnieri*), narrow-leaf cattail (*Typha domingensis*), and broad-leaf cattail (*T. latifolia*).

Emergent Wetland

Emergent wetlands are typically persistent freshwater or alkali wetlands that are dominated by low growing, perennial species such as sedges (*Carex spp.*, *Eleocharis spp.*), rushes (*Juncus spp.*), docks and sorrels (*Rumex spp.*), breadfruit bur reed (*Sparganium eurycarpum*), and many other species. This vegetation community is typically found in channels, seeps and springs, floodplains, margins of lakes and rivers, and various basins such as pools and ponds. In San Diego, emergent wetlands often occur in previously disturbed areas where this wetland community is emerging but has not yet established much species diversity; however, this vegetation community also occurs in undisturbed areas as well.

On-site, emergent wetland is dominated by alkali bulrush, celery (*Apium graveolens*), tall flatsedge (*Cyperus eragrostis*), fragrant flatsedge (*C. odoratus*), needle spike rush (*Eleocharis acicularis*), slender willow herb (*Epilobium ciliatum*), knotgrass (*Paspalum distichum*), and curly dock. Emergent wetland occurs in a man-made drainage (Drainage A) surrounded by golf course in the northeastern portion of the site. It is of limited extent and is isolated from the San Diego River. Emergent wetland also occurs in the southwestern portion of the site, where it is adjacent to wetland/riparian habitat connected to the San Diego River (Drainage C).

Open Water

Open water includes reservoirs, lakes, ponds, and relatively large sloughs, channels, and rivers or streambeds that contain water throughout the year. Open water occurs in scattered patches along the San Diego River.

Disturbed Land

Disturbed land includes areas that retain a soil substrate but have been physically disturbed by previous human activity. These areas are no longer recognizable as a native or naturalized vegetation association. Vegetation, if present, is typically composed of predominately non-native species introduced and established through human action. These areas are not typically artificially irrigated but receive water from precipitation and run-off.

Disturbed land primarily occurs in the northeastern portion of the project site, including a large vacant lot but also occurs in several other scattered locations along the San Diego River. On-site, this other upland is dominated by non-native species that tend to colonize disturbed land such as fennel (*Foeniculum vulgare*), crown daisy (*Glebionis coronaria*), bristly ox-tongue (*Helminthotheca echinoides*), cocklebur (*Xanthium strumarium*), black mustard (*Brassica nigra*), Russian thistle (*Salsola tragus*), castor bean (*Ricinus communis*), and tree tobacco (*Nicotiana glauca*).

Urban/Developed

Urban/developed areas have been constructed upon, or are otherwise physically altered to the extent that no naturally occurring, native vegetation is supported. These areas contain permanent or semi-permanent structures, pavement or hardscape, and landscaped areas that typically require irrigation.

Urban/developed areas occupy the majority of the project site and include the golf course greens, existing clubhouse, parking lot, and MTS right-of-way with trolley tracks. On-site, urban/developed land also includes associated landscaping that supports oleander (*Nerium oleander*), Mexican fan palm (*Washingtonia robusta*), acacia, eucalyptus, and other various ornamental trees and shrubs. Golf course water features are also developed features on-site because they are man-made, concrete-lined, artificial features constructed as water hazards for the golf course.

5.4.1.4 Plants

A total of 101 plant species have been observed on-site (see Appendix C of the BTR, *Plant Species Observed*). Of these, 44 species (44 percent) are considered native, and 57 species (56 percent) are considered non-native and/or naturalized.

5.4.1.5 Zoology

A total of 103 animal species have been observed or detected on-site (or off-site to the west). Animal species observed or detected include five butterflies, two fish, one amphibian, two reptiles, 93 birds, and two mammals. Eleven of these species are considered sensitive.

5.4.1.6 Sensitive Biological Resources

According to City Municipal Code (Chapter 11, Article 3, Division 1) and the City's Biology Guidelines (City 2018), sensitive biological resources refers to upland and/or wetland areas that meet any one of the following criteria:

- (a) Lands that have been included in the City's MSCP Preserve (i.e., the MHPA);
- (b) Wetlands;
- (c) Lands outside the MHPA that contain Tier I, Tier II, Tier IIIA, or Tier IIIB habitats;
- (d) Lands supporting species or subspecies listed as rare, endangered, or threatened under Section 670.2 or 670.5, Title 14, California Code of Regulations, or the federal Endangered Species Act, Title 50, Code of Federal Regulations, Section 17.11 or 17.12, or candidate species under the California Code of Regulations;
- (e) Lands containing habitats with MSCP Narrow Endemic species as listed in the Biology Guidelines (City 2018); or
- (f) Lands containing habitats of MSCP Covered Species as listed in the Biology Guidelines

(City 2018).

Sensitive Vegetation Communities

In addition to City Municipal Code (Chapter 11, Article 3, Division 1) and the City's Biology Guidelines (City 2018) discussed above, sensitive vegetation communities are those considered rare within the region or sensitive by CDFW (Holland 1986) and/or the City. These communities, in any form (e.g., disturbed), are considered sensitive because they have been historically depleted, are naturally uncommon, or support sensitive species. The project site supports seven sensitive vegetation communities: southern cottonwood-willow riparian forest (including disturbed), southern willow scrub (including disturbed), coastal and valley freshwater marsh, emergent wetland, and open water.

Sensitive Plant and Wildlife Species

Sensitive plant species are those that are considered Federal, State, or California Native Plant Society (CNPS) rare, threatened, or endangered; MSCP Covered Species; or MSCP Narrow Endemic species. Sensitive animal species are those that are considered Federal or State threatened or endangered; MSCP Covered Species; or MSCP Narrow Endemic species. More specifically, if a species is designated with any of the following statuses (a-c below), it is considered sensitive per City Municipal Code (Chapter 11, Article 3, Division 1):

- (a) A species or subspecies is listed as rare, endangered, or threatened under Section 670.2 or 670.5, Title 14, California Code of Regulations, or the ESA, Title 50, Code of Federal Regulations, Section 17.11 or 17.12, or candidate species under the California Code of Regulations;
- (b) A species is a Narrow Endemic as listed in the Biology Guidelines in the Land Development Manual (City 2018); and/or
- (c) A species is a Covered Species as listed in the Biology Guidelines in the Land Development Manual (City 2018).

A plant species may also be considered sensitive if it is included in the CNPS Inventory of Rare and Endangered Plants (CNPS 2017). California Rare Plant Rank 1 includes plants that are rare, threatened or endangered in California. California Rare Plant Rank 2 includes plants that are rare, threatened or endangered in California but more common elsewhere. California Rare Plant Rank 3 includes plants that are eligible for State listing as rare, threatened or endangered. California Rare Plant Rank 4 plants are locally significant but few, if any, are eligible for State listing. A wildlife species may also be considered sensitive if it is included on the CDFW's Special Animals List (CDFW 2017) as a State Species of Special Concern, State Watch List species, State Fully Protected species, or Federal Bird of Conservation Concern.

No sensitive plant species have been observed on-site. However, sensitive plant species have the potential to occur on-site, including Narrow Endemic species. Narrow Endemic species are a subset

of MSCP Covered Species and also have the potential to occur on-site. The City specifies additional conservation measures to ensure impacts to Narrow Endemic species are avoided.

Eleven sensitive animal species were found on-site or off-site to the west: Cooper's hawk (*Accipiter cooperii*), Vaux's swift (*Chaetura vauxi*), Clark's marsh wren (*Cistothorus palustris clarkae*), willow flycatcher (*Empidonax traillii*), yellow-breasted chat (*Icteria virens*), osprey (*Pandion haliaetus*), double-crested cormorant (*Phalacrocorax auritus*), light-footed Ridgway's rail (*Rallus obsoletus levipes*), yellow warbler (*Setophaga petechia*), western bluebird (*Sialia mexicana*), and least Bell's vireo (*Vireo bellii pusillus*). These species are described in further detail below.

Cooper's hawk (*Accipiter cooperii*)

Sensitivity: State Watch List; MSCP Covered Species.

Habitat(s): Lowland riparian areas and oak woodlands in proximity to suitable foraging areas such as scrubland or fields.

Presence on-site: Cooper's hawk was observed on-site in 2018 in disturbed southern cottonwood-willow riparian forest.

Vaux's swift (*Chaetura vauxi*)

Sensitivity: State Species of Special Concern.

Habitat(s): Nests in coniferous or mixed forest. Forages in forest openings, especially above streams.

Presence on-site: Observed off site to the west during the 2018 least Bell's vireo and southwestern willow flycatcher survey.

Clark's marsh wren (*Cistothorus palustris clarkae*)

Sensitivity: State Species of Special Concern.

Habitat(s): Freshwater and brackish marshes.

Presence on-site: Detected in three locations in coastal and valley freshwater marsh along the San Diego River in the central portion of the site in 2018.

Willow flycatcher (*Empidonax traillii*)

Sensitivity: Federal Bird of Conservation Concern; State Endangered. The southwestern subspecies (*E. t. extimus*) is Federal Endangered, State Endangered, and an MSCP Covered Species.

Habitat(s): Willow flycatcher breeding habitat in California is typically moist meadows with perennial streams; lowland riparian woodlands dominated by willows, primarily in tree form; and cottonwoods; or smaller spring-fed or boggy areas with willow or alders (*Alnus* spp.; Craig and Williams 1998). The southwestern subspecies is a riparian obligate species restricted to dense stream-side vegetation composed of dense mixtures of native broadleaf trees and shrubs often interspersed with small openings, open water, or shorter vegetation, creating a mosaic that is not uniformly dense (Craig and Williams 1998).

Presence on-site: Two willow flycatchers were detected during the first (of five) site visits of the southwestern willow flycatcher survey on May 22, 2015 along the San Diego River on-site. These

birds were not relocated during the second site visit on June 2, 2015. One willow flycatcher was detected during the third site visit on June 13, 2015 in the same location as one of the individuals detected on May 22. It was determined that all of these individuals were migrants based on the lack of willow flycatcher detection after the third site visit (the fourth and fifth site visits were made on June 25 and July 6, 2015). During the 2018 protocol survey for the southwestern willow flycatcher, one willow flycatcher was detected by its call along the San Diego River in the central portion of the site on May 17. Due to the sound of its call (that of a northwestern willow flycatcher subspecies) and the fact that it was only detected once, it was determined to be a migrant willow flycatcher. The southwestern subspecies of willow flycatcher was, therefore, not detected on-site.

Yellow-breasted chat (*Icteria virens*)

Sensitivity: State Species of Special Concern.

Habitat(s): Dense riparian habitats.

Presence on-site: The yellow-breasted chat was observed on-site during the 2015 least Bell's vireo and southwestern willow flycatcher survey and was again detected in southern cottonwood-willow riparian forest on-site during this survey in 2018.

Osprey (*Pandion haliaetus*)

Sensitivity: State Watch List.

Habitat(s): Rivers, bays, lakes, or seacoasts.

Presence on-site: Observed over open water in the San Diego River off site to the west during the 2018 least Bell's vireo and southwestern willow flycatcher survey.

Double-crested cormorant (*Phalacrocorax auritus*)

Sensitivity: State Watch List.

Habitat(s): Fresh and salt water habitats.

Presence on-site: The double-crested cormorant was observed on-site during the 2015 least Bell's vireo and southwestern willow flycatcher survey and was observed again in coastal and valley freshwater marsh along the San Diego River on-site during this survey in 2018.

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

Sensitivity: Federal Endangered; State Endangered, State Fully Protected; MSCP Covered.

Habitat(s): According to the USFWS (2009 and references therein):

The light-footed clapper [Ridgway's] rail uses coastal salt marshes, lagoons, and their maritime environs (Zemba 1994, pp. 1-2). Nesting habitat includes tall, dense cordgrass (*Spartina foliosa*) and occasionally in pickleweed (*Salicornia virginica*) in the low littoral zone, wrack deposits in the low marsh zone, and hummocks of high marsh within the low marsh zone (Massey et al. 1984, p. 78). At Mugu Lagoon nesting occurs in stands of (*Juncus acutus* spp. *leopoldii*) (Zemba et al. 2007, p. 5). Fringing areas of high marsh serve as refugia during high tides (Zemba et al. 1989, p. 42). Although used infrequently, this habitat may be extremely important for reducing mortality during high tides. Although less common, light-footed clapper [Ridgway's] rails have also been observed to reside and nest in freshwater marshes (Thelander and Crabtree 1994, p.

161). Activities of the light-footed clapper [Ridgway's] rail are tide-dependent (Zembal et al. 1989, pp. 39-42). They require shallow water and mudflats for foraging, with adjacent higher vegetation for cover during high water (Zeiner et al. 1990, p. 174). They forage in all parts of the salt marsh, concentrating their efforts in the lower marsh when the tide is out, and moving into the higher marsh as the tide advances.

Presence on-site: Observed in four locations along the San Diego River on-site in coastal and valley freshwater marsh/open water during the 2018 least Bell's vireo and southwestern willow flycatcher survey.

Yellow warbler (*Setophaga petechia*)

Sensitivity: Federal Bird of Conservation Concern; State Species of Special Concern.

Habitat(s): Riparian woodland, Mojave riparian forest, mule fat scrub, and southern willow scrub.

Presence on-site: Detected along the San Diego River in 2017. It was also observed on-site during the 2015 and 2018 least Bell's vireo and southwestern willow flycatcher surveys.

Western bluebird (*Sialia mexicana*)

Sensitivity: MSCP Covered.

Habitat(s): Open woodlands, parks, farmlands, orchards.

Presence on-site: Observed on-site during the 2018 least Bell's vireo and southwestern willow flycatcher survey.

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

Sensitivity: Federal Endangered; State Endangered; MSCP Covered Species.

Habitat(s): Mature riparian woodland, Mojave riparian forest, mule fat scrub, and southern willow scrub.

Presence on-site: In 2015, the least Bell's vireo was detected more than 350 feet west of the site along the San Diego River during the first five (of eight) site visits of the least Bell's vireo survey that year. The individual was not detected during the last three site visits on June 25, July 6, and July 17, 2015. In 2018, a solitary least Bell's vireo was detected in the same off-site area on July 9. Since it was only detected on that date and was tracked moving upstream, it was determined to be a transient male.

Jurisdictional Wetland Areas

Jurisdictional areas including Waters of the U.S., under the jurisdiction of the USACOE, and Waters of the State, under the jurisdiction of the CDFW, encompass wetlands and also may include ephemeral and intermittent streams that may or may not be vegetated. City jurisdiction extends only to wetlands. Generally, wetlands are lands where saturation with water is the dominant factor determining the nature of soil development and the types of plant and animal communities living in the soil and on its surface. Wetlands vary widely because of regional and local differences in soils, topography, climate, hydrology, water chemistry, vegetation, and other factors. Waters of the U.S., Waters of the State, and City wetlands are considered sensitive. Table 5.4-2, *Jurisdictional Features On-site* shows the various jurisdictional areas occurring on the project site and the area of each.

Table 5.4-2, Jurisdictional Features On-Site

Feature	Wetland Waters of the U.S.	Wetland Waters of the State ¹	City Wetlands
Drainage A²			
Emergent wetland ²	0.00	0.00	n/a
Disturbed southern willow scrub ⁴	0.00	0.00	n/a
Drainage B – San Diego River			
Coastal and valley freshwater marsh	2.97	3.10	3.10
Southern willow scrub	2.73	3.40	3.40
Southern cottonwood-willow riparian forest	3.38	4.68	4.68
Disturbed southern cottonwood-willow riparian forest	0.00	0.13	0.13
Open water	0.95	0.95	0.95
Drainage C			
Emergent wetland	0.03	0.03	0.03
Disturbed southern cottonwood-willow riparian forest	0.00	1.21	1.21
Disturbed southern willow scrub	0.00	0.12	0.12
TOTAL	10.06	13.62	13.62

Notes: Includes Fashion Valley Road improvement area, shown in acres. There are no non-wetland Waters of the U.S. or State on-site

¹CDFW jurisdictional features

²Vegetation in Drainage A established within man made (constructed) and maintained stormwater drainage feature

Waters of the U.S

Approximately 10.06 acres along the San Diego River and two of its tributaries on the project site and in the Fashion Valley Road improvements area meet the three USACOE wetland criteria. No non-wetland Waters of the U.S. exist on the project site.

Waters of the State

California Fish and Game Code (see Section 5.4.2, *Regulatory Framework*) provides specific protection for Waters of the State when an activity would alter the flow or change or use any material from the bed, channel, or bank of any perennial, intermittent, or ephemeral river, stream, and/or lake as such an activity may substantially adversely affect fish and wildlife resources conserved, protected, and managed by CDFW. Waters of the State are based on the presence of riparian vegetation or regular surface flow, and for streambeds, having at least periodic or intermittent flow through a bed or channel with banks.

Wetland Waters of the State on-site and in the Fashion Valley Road improvements area total approximately 13.62 acres and occur along the San Diego River and one of its tributaries. There are no non-wetland Waters of the State.

City Wetlands

City Wetlands are characterized as:

- A. All areas persistently or periodically containing naturally occurring wetland vegetation communities;
- B. Areas that have hydric soils or wetland hydrology and lack naturally occurring wetland vegetation communities; and/or
- C. Areas lacking wetland vegetation communities, hydric soils, and wetland hydrology due to non-permitted filling of previously existing wetlands.

Based on these characterizations, City Wetlands on-site and in the Fashion Valley Road improvements area include approximately 13.62 acres in Drainages B (San Diego River) and C. A review of historical aerial photographs of the site from 1953 through 1996 show that historically, there was no drainage feature at the location of Drainage A. That is, Drainage A is a man-made feature in an area that was historically upland. The wetland vegetation that is present is not, therefore, naturally occurring. Therefore, Drainage A is not City Wetland, and it is not the intent of the City to regulate artificially created wetlands in historic non-wetland areas unless they have been delineated as wetlands by the Corps and/or CDFW (City 2018). At this time, State and Federal permits have not been obtained; therefore, vegetation associated with Drainage A has been presented hereafter as “emergent wetland” and “disturbed southern willow scrub” with footnotes as necessary to distinguish these man-made wetlands from naturally occurring wetlands associated with Drainages B and C.

Wetland Buffer Analysis

Presently on-site, there is no wetland buffer between the San Diego River and the golf course and its greens, cart paths, driving range, maintenance facilities, landscaping, and other active use features. These uses directly abut the river.

The project would provide a biological buffer through the establishment of a 50-foot wide no use buffer and a passive park area in Figure 5.4-3, *Development Plan/Impacts*. Boulders or deterrent vegetation, as well as peeler log fencing, would be installed at the edge of this no use buffer to deter public access. The no use buffer and passive park areas north and south of the river channel would be graded to provide flood capacity along the river and restored with native plant species appropriate within and adjacent to native wetland/riparian habitats. No uses would be allowed in the no use buffer (except proposed MSCP complaint trails attached to the two existing bridges on-site), and the passive park would only allow passive uses (i.e., walking/hiking trails and nature observation nodes). This would result in an overall buffering of the MHPA, river, and wetland habitat restoration from active park uses by a minimum of 55 feet (in the southwestern and northeastern portions of the project site) to a maximum of 590 feet (in the western portion of the project site), with an average distance of 175 feet.

Wildlife Movement Corridors

Wildlife corridors are essential to maintain healthy and genetically diverse plant and animal species populations. Wildlife corridors maintain connectivity between formerly contiguous wildlands allowing: 1) wide-ranging animals to travel, migrate, and meet mates; 2) an avenue along which plants can propagate; 3) for genetic interchange; 4) population movement; and 5) recolonization of habitats where other populations have been extirpated.

Wildlife corridors can be classified as either regional corridors or local corridors. Regional corridors are defined as those linking two or more large areas of natural open space, and local corridors are defined as those allowing resident animals to access critical resources (e.g., food, cover, water) in a smaller area that might otherwise be isolated (e.g., by urban development).

The central portion of the project site contains the MHPA along the San Diego River and provides for a regional wildlife corridor on-site. On the project site, the San Diego River provides for local and regional movement of wildlife, but movement for some species is likely impeded or limited by adjacent urbanization and uses such as the existing MTS trolley line, fences, golf course development (buildings and parking lots), and Fashion Valley Road that crosses the river at grade, as well as development that constricts the width of the river on-site. Movement to/from the site on the eastern boundary is constrained by off-site, adjacent development north and south of the San Diego River channel built close to the channel's edge.

Animals are relatively free to move through the existing river channel, although it is narrow, incised, and supports water. Adjacent to the channel on the existing golf course, animal movement is less constrained, though limited to nighttime movement as the golf course is actively used during the day.

5.4.2 Regulatory Framework

This section summarizes Federal, State, and local regulations that govern biological resources potentially impacted by the project.

5.4.2.1 Federal

Endangered Species Act

The ESA provides protections for species endangered or threatened with extinction. ESA prohibits the "take" of endangered or threatened wildlife species. "Take" is defined to include harassing, harming, pursuing, hunting, shooting, wounding, killing, trapping, capturing, or collecting wildlife species or any attempt to engage in such conduct (ESA Section 3 [(3)(19)]). "Harm" is further defined to include significant habitat modification or degradation that results in death or injury to listed species by significantly impairing behavioral patterns (50 CFR Section 17.3). "Harass" is defined as actions that create the likelihood of injury to listed species to such an extent as to significantly

disrupt normal behavior patterns (50 CFR Section 17.3). Actions that result in take can result in civil or criminal penalties. Projects that are implemented consistent with the City of San Diego's MSCP and Biology Guidelines (City of San Diego 2018) would be allowed to take listed species with the City of San Diego's authorization and approval.

Migratory Bird Treaty Act

The Migratory Bird Treaty Act (MBTA; 16 U.S. Code Sections 703-711) includes provisions for protection of migratory birds, including the non-permitted take of migratory birds. The MBTA regulates or prohibits taking, killing, possession of, or harm to migratory bird species listed in Title 50 Code of Federal Regulations Section 10.13. Migratory birds include geese, ducks, shorebirds, raptors, songbirds, and many others. Disturbance that causes nest abandonment and/or loss of reproductive effort (killing or abandonment of eggs or young) is considered a "take." The MBTA is an international treaty for the conservation and management of bird species that migrate through more than one country and is enforced in the United States by the USFWS. The MBTA was amended in 1972 to include protection for migratory birds of prey (raptors). As a general/standard condition, the project must comply with the MBTA.

Clean Water Act

Under Section 404 of the Clean Water Act, the USACOE is charged with regulating the discharge of dredge and fill materials into jurisdictional Waters of the U.S. The terms "Waters of the U.S." and "jurisdictional waters" have a broad meaning that includes special aquatic sites, such as wetlands. USACOE wetland boundaries are determined using three criteria (vegetation, hydrology, and soils) established for wetland delineations, as described within the Wetlands Delineation Manual (Environmental Laboratory 1987) and Regional Supplement to the Corps of Engineers Wetland Delineation Manual: Arid West Region (Corps 2008b).

Waters of the U.S., as defined by regulation and refined by case law, include:

1. The territorial seas;
2. Coastal and inland waters, lakes, rivers, and streams that are navigable Waters of the U.S., including their adjacent wetlands;
3. Tributaries to navigable Waters of the U.S., including adjacent wetlands; and (4) interstate waters and their tributaries, including adjacent isolated wetlands and lakes, intermittent and ephemeral streams, prairie potholes, and other waters that are not a part of a tributary system to interstate waters or navigable Waters of the U.S., the degradation or destruction of which could affect interstate commerce.

Section 401 of the Clean Water Act requires that any applicant for a Federal license or permit to conduct any activity that may result in a discharge to Waters of the U.S. must obtain a Water Quality Certification, or a waiver thereof, from the state in which the discharge originates. In California, the RWQCB issues Water Quality Certifications.

5.4.2.2 State

California Environmental Quality Act

Primary environmental legislation in California is found in the CEQA and its implementing guidelines (State CEQA Guidelines), requiring that projects with potential adverse effects or impacts on the environment undergo environmental review. Adverse impacts to the environment are typically mitigated as a result of the environmental review process in accordance with existing laws and regulations.

California Endangered Species Act

The California Endangered Species Act (CESA) established that it is State policy to conserve, protect, restore, and enhance endangered species and their habitats. Under State law, plant and animal species may be formally designated rare, threatened, or endangered by official listing by the California Fish and Game Commission. CESA authorizes that private entities may “take” plant or wildlife species listed as endangered or threatened under the ESA and CESA, pursuant to a Federal Incidental Take Permit if the CDFW certifies that the incidental take is consistent with the CESA (Fish & Game Code Section 2080.1[a]). For State-only listed species, Section 2081 of the CESA authorizes the CDFW to issue an Incidental Take Permit for a State listed threatened or endangered species if specific criteria are met.

Native Plant Protection Act

Sections 1900 - 1913 of the California Fish and Game Code (CFGF) (Native Plant Protection Act) direct the CDFW to carry out the Legislature’s intent to “...*preserve, protect and enhance endangered or rare native plants of this state.*” The Native Plant Protection Act gives the CFGF the power to designate native plants as “endangered” or “rare” and protect endangered and rare plants from take.

California Fish and Game Code

The CFGF provides specific protection and listing for several types of biological resources. Section 1600 of California Fish and Game Code requires a Streambed Alteration Agreement for any activity that would alter the flow, change, or use any material from the bed, channel, or bank of any perennial, intermittent, or ephemeral river, stream, and/or lake.

Typical activities that require a Streambed Alteration Agreement include excavation or fill placed within a channel, vegetation clearing, structures for diversion of water, installation of culverts and bridge supports, cofferdams for construction dewatering, and bank reinforcement. Notification is required prior to any such activities, and CDFW will issue a Streambed Alteration Agreement with any necessary mitigation to ensure protection of the State’s fish and wildlife resources.

Pursuant to CFGF Section 3503, it is unlawful to take, possess, or needlessly destroy the nest or eggs of any bird, except as otherwise provided by this code or any regulation made pursuant thereto. Raptors and owls and their active nests are protected by CFGF Section 3503.5, which states that it is

unlawful to take, possess, or destroy any birds of prey or to take, possess, or destroy the nest or eggs of any such bird unless authorized by the CDFW. Section 3513 states that it is unlawful to take or possess any migratory non-game bird as designated in the MBTA. These regulations could require that construction activities (particularly vegetation removal or construction near nests) be reduced or eliminated during critical phases of the nesting cycle unless surveys by a qualified biologist demonstrate that nests, eggs, or nesting birds will not be disturbed, subject to approval by CDFW and/or USFWS. As a general/standard condition, the project must comply with California Fish and Game Code Sections 3503 and 3503.5.

Fully protected species are described in CFGC Sections 3511, 4700, 5050, and 5515. These species include certain fish, amphibian and reptile, bird, and mammal species. These statutes prohibit take or possession of fully protected species and do not provide for authorization of incidental take of fully protected species.

Porter-Cologne Water Quality Control Act Of 1970

The Porter-Cologne Water Quality Control Act of 1970 grants the State Water Resource Control Board and its regional offices power to protect water quality and is the primary vehicle for implementation of the State's responsibilities under Section 401 of the Clean Water Act. The Porter-Cologne Act grants the State Water Resource Control Board authority and responsibility to adopt plans and policies, regulate discharges to surface and groundwater, regulate waste disposal sites, and require cleanup of discharges of hazardous materials and other pollutants. Typically, the State Water Resource Control Board and RWQCB act in concert with the Corps under Section 401 of the Clean Water Act in relation to permitting fill of Waters of the U.S.

5.4.2.3 Local

Multiple Species Conservation Program

The MSCP is a comprehensive habitat conservation planning program for San Diego County. Local jurisdictions, including the City, implement their portions of the MSCP through subarea plans, which describe specific implementing mechanisms. The City's MSCP Subarea Plan, approved in March 1997, is a plan and process for the issuance of permits under the Federal and State Endangered Species Act and the California Natural Communities Conservation Planning Act of 1991. The primary goal of the MSCP Subarea Plan is to conserve viable populations of sensitive species and to conserve regional biodiversity while allowing for reasonable economic growth. In July 1997, the City signed an Implementing Agreement with the USFWS and the CDFW. The Implementing Agreement serves as a binding contract between the City, the USFWS, and the CDFW that identifies the roles and responsibilities of the parties to implement the MSCP and Subarea Plan. The agreement allows the City to issue incidental take authorizations under the provisions of the MSCP. Applicable State and Federal permits are still required for wetland and listed species that are not covered by the MSCP.

Multi-Habitat Planning Area

One of the primary objectives of the MSCP is to identify and maintain a preserve system, which allows for animals and plants to exist at both the local and regional levels. The MSCP has identified large blocks of native habitat having the ability to support a diversity of plant and animal life known as “core biological resource areas.” “Linkages” between these core areas provide for wildlife movement. These lands have been determined to provide the necessary habitat quality, quantity, and connectivity to sustain the unique biodiversity of the San Diego region. Input from responsible agencies and other interested participants resulted in creation of the City’s MHPA. The MHPA is the area within which the permanent MSCP preserve would be assembled and managed for its biological resources. MHPA lands are considered by the City to be sensitive biological resources. In accordance with the MSCP, for parcels located outside the MHPA, there is no limit on encroachments into sensitive biological resources, with the exception of wetlands and listed noncovered species’ habitat. Regardless, impacts to sensitive biological resources are to be assessed, and mitigation, where necessary, must be provided in conformance with the City’s Biology Guidelines (City of San Diego 2018).

To address the integrity of the MHPA, guidelines were developed to manage land uses adjacent to the MHPA. The adjacency guidelines are intended to be addressed on a project-by-project basis either in the planning or management stage. These guidelines address the issues of drainage, toxics, lighting, noise, invasives, brush management, access to MHPA, and grading/land development.

As described above, MHPA lands are those that have been included within the City’s MSCP Subarea Plan for habitat conservation. These lands have been determined to provide the necessary habitat quality, quantity, and connectivity to sustain the unique biodiversity of the San Diego region. MHPA lands are considered by the City to be a sensitive biological resource.

Environmentally Sensitive Lands Regulations

Mitigation requirements for sensitive biological resources follow the requirements of the City’s Biology Guidelines (2018) as outlined in the City’s Municipal Code ESL Regulations (Chapter 14, Article 3, Division 1). Impacts to biological resources within the City’s Preserve, the MHPA, must comply with the ESL Regulations, which also serve as standards for the determination of biological impacts and mitigation under CEQA in the City. ESL include sensitive biological resources, steep hillsides, coastal beaches, sensitive coastal bluffs and 100-year floodplains (San Diego Municipal Code [SDMC] 143.0110).

The purpose of the ESL Regulations is to *protect, preserve and, where damaged, restore the ESL of San Diego and the viability of the species supported by those lands* (SDMC 143.0101). Outside the Coastal Overlay Zone where the Project lies, impacts to wetlands should be avoided. Unavoidable impacts should be minimized to the maximum extent practicable. Whether or not an impact is unavoidable will be determined on a case-by-case basis. If impacts to wetlands cannot be avoided, a deviation from the ESL Regulations is required. Examples of unavoidable impacts include those necessary to allow reasonable use of a parcel entirely constrained by wetlands, roads where the only access to

the developable portion of the site results in impacts to wetlands, and essential public facilities (essential roads, sewer, water lines, etc.) where no feasible alternative exists.

The project would impact wetlands and would, therefore, require deviations from the ESL Regulations. Deviations to the regulations for development located outside of the Coastal Overlay Zone (where the project lies) shall not be granted unless the development qualifies to be processed as [at least] one of three options set forth in the ESL Regulations. The project would qualify under the EPP Option for the Public Roads (i.e., Fashion Valley Road). According to SDMC (Chapter 14, Article 3, Division 1; §143.0150 Deviations from ESL Regulations), *a deviation may only be requested for an EPP where no feasible alternative exists that would avoid impacts to wetlands*. Deviations from ESL Regulations may be granted for Essential Public Projects that include:

- (i) Any public project identified in an adopted land use plan or implementing document and identified on the Essential Public Projects List adopted by Resolution No. R-307377 as Appendix III to the Biology Guidelines; or
- (ii) Linear infrastructure, including but not limited to major roads and land use plan circulation element roads and facilities including bike lanes, water and sewer pipelines including appurtenances, and stormwater conveyance systems including appurtenances; or
- (iii) Maintenance of existing public infrastructure; or
- (iv) State and federally mandated projects.

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 USACOE General Regulatory Policies (33CFR 320- 330) list criteria for consideration when evaluating wetland functions and values. These include wildlife habitat (spawning, nesting, rearing, and foraging), food chain productivity, water quality, ground water recharge, and areas for the protection from storm and floodwaters.

The ESL Regulations also specify development requirements inside and outside of the MHPA. Inside the MHPA, development must be located in the least sensitive portion of a given site; outside of the MHPA, development must avoid wetlands and non-MSCP Covered Species (City 2018). The ESL Regulations further require that impacts to sensitive biological resources must be assessed and mitigation provided where necessary, as required by Section III of the City's biology guidelines.

Biology Guidelines

The City's Biology Guidelines (2018) have been formulated by the Development Services Department to aid in the implementation and interpretation of the ESL Regulations. Section III of the Biology Guidelines (Biological Impact Analysis and Mitigation Procedures) also serves as standards for the determination of impact and mitigation under CEQA and the Coastal Act. The Biology Guidelines are the baseline biological standards for processing Neighborhood Development Permits, Site Development Permits, and Coastal Development Permits issued pursuant to ESL Regulations.

Mitigation requirements for sensitive biological resources follow the requirements of the City's Biology Guidelines (2018) as outlined in the City's Municipal Code ESL Regulations (Chapter 14, Article 3, Division 1). Impacts to biological resources within the City's MSCP Preserve, the MHPA, must comply with the ESL Regulations, which also serve as standards for the determination of biological impacts and mitigation under CEQA in the City. ESL include sensitive biological resources, steep hillsides, coastal beaches, sensitive coastal bluffs and 100-year floodplains (San Diego Municipal Code [SDMC] 143.0110).

Outside the Coastal Overlay Zone (where the project lies), impacts to wetlands should be avoided. Unavoidable impacts should be minimized to the maximum extent practicable. Whether or not an impact is unavoidable is determined on a case-by-case basis. If impacts to wetlands cannot be avoided, a deviation from the ESL Regulations is required. A wetland buffer shall be maintained around all wetlands as appropriate to protect the functions and values of the wetland. ESL Regulations also specify development requirements inside and outside of the MHPA. Inside the MHPA, development must be located in the least sensitive portion of a given site; outside of the MHPA, development must avoid wetlands and non-MSCP Covered Species. The ESL Regulations further require that impacts to sensitive biological resources must be assessed and mitigation provided where necessary, as required by Section III of the City's biology guidelines.

5.4.3 Methodology

A series of field surveys were conducted on the project site to assess existing conditions, map current vegetation, and identify sensitive species. The field surveys included vegetation mapping and a jurisdictional delineation in 2014, focused surveys for the least Bell's vireo and southwestern willow flycatcher in 2015 and 2018, and sensitive plant surveys in spring 2018. The vegetation mapping was subsequently updated in 2017. The surveys for the least Bell's vireo and southern willow flycatcher were conducted in accordance with the current Least Bell's Vireo Survey Guidelines and the current Southwestern Willow Flycatcher Survey Protocol. Sensitive plant species surveys were conducted on-foot and with binoculars to search for sensitive plant species with potential to occur (based on, for example, habitat types and nearby historical records).

Vegetation mapping was conducted on-foot and with the use of a golf cart and mapped by hand onto aerial imagery. Vegetation community classifications follow Holland (1986) as modified by Oberbauer *et al* (2008). The hand-drawn vegetation community and land cover type boundaries were provided to a Geographic Information System (GIS) analyst and were digitized using GIS software.

Wetland Waters of the U.S., regulated by the USACOE, were delineated following the methods outlined by the USACOE. USACOE wetland boundaries were determined using the three criteria (vegetation, hydrology, and soils) established for wetland delineations. Waters of the State, regulated by the CDFW, were determined based on the presence of riparian vegetation or regular surface flow. City wetlands were determined based on conditions summarized in City Municipal

Code (Chapter 11, Article 3, Division 1).

5.4.4 Impact Analysis

5.4.4.1 Issue 1 – Issue 4

- Issue 1 Would the project result in a substantial adverse impact, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in the MSCP or other regional plans, policies or regulations, or by the California Department of Fish and Wildlife (CDFW) or U.S. Fish and Wildlife Service (USFWS)?*
- Issue 2 Would the project result in a substantial adverse impact on any Tier I Habitats, Tier II Habitats, Tier IIIA Habitats, or Tier IIIB Habitats as identified in the Biology Guidelines of the Land Development manual or other sensitive natural community identified in local or regional plans, policies, regulations, or by the CDFW or USFWS?*
- Issue 3 Would the project result in a substantial adverse impact on wetlands (including, but not limited to, marsh, vernal pool, riparian, etc.) through direct removal, filling, hydrological interruption, or other means?*
- Issue 4 Would the project interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, including linkages identified in the MSCP Plan, or impede the use of native wildlife nursery sites?*

Impact Thresholds

In accordance with the City's Significance Determination Thresholds and LDC Biology Guidelines (2018), the project would have a significant impact if:

- *Lands containing Tier I, II, IIIa and IIIb (see Table 3 of City's Biology Guidelines) and all wetlands [see Tables 2a and/or 2b of City's Biology Guidelines] are considered sensitive and declining habitats. As such, impacts to these resources may be considered significant. Lands designated as Tier IV are not considered to have significant habitat value and impacts would not be considered significant.*
- *Impacts to individual sensitive species, outside of any impacts to habitat, may also be considered significant based upon the rarity and extent of impacts. Impacts to State or federally listed species and all narrow endemics should be considered significant. Certain species covered by the MSCP and VPHCP and other species not covered by the MSCP, may be considered significant on a case-by-case basis taking into consideration all pertinent information regarding distribution, rarity, and the level of habitat conservation afforded by the MSCP.*

- *Total upland impacts (Tiers I- IIIB) less than 0.1 acre are not considered significant and do not require mitigation.*
- *Impacts to non-native grasslands totaling less than 1.0 acres which are completely surrounded by existing urban developments are not considered significant and do not require mitigation. Examples may include urban infill lots.*
- *Total wetland impacts less than 0.01 acre are not considered significant and do not require mitigation. THIS DOES NOT APPLY TO VERNAL POOLS, road pools supporting listed fairy shrimp, or wetlands within the Coastal Zone.*

Analysis

Direct Impacts

Vegetation Communities

As shown on Table 5.4-3, *Direct Impacts to Vegetation Communities and Land Cover Types*, the Riverwalk project would result in direct impacts to approximately 0.57 acre of southern cottonwood-willow riparian forest, 0.05 acre of disturbed southern willow scrub, 0.01 acre of coastal and valley freshwater marsh, 0.11 acre of emergent wetland, 0.06 acre of open water, 6.72 acres of disturbed land, and 168.69 acres of urban/developed land cover associated with construction of the Riverwalk Specific Plan.

Permanent and temporary impacts to 0.64 acre of wetland/riparian vegetation communities that would result from the Fashion Valley Road improvements (southern cottonwood-willow riparian forest, coastal and valley freshwater marsh) and open water would be significant. This includes permanent and temporary impacts that overlap with Town and Country Resort Hotel restoration enhancement.

Permanent impacts to 0.16 acre of wetland/riparian vegetation communities (disturbed southern willow scrub and emergent wetland) from the mixed-use component of the project are in a constructed drainage (Drainage A). Because Drainage A is not considered City wetlands, impacts would not be significant.

Permanent impacts to 0.16 acre of wetland/riparian vegetation communities (disturbed southern willow scrub and emergent wetland) from the mixed-use component of the project are in a constructed drainage (Drainage A). Because Drainage A is not considered City wetlands, impacts would not be significant.

Table 5.4-3. Direct Impacts to Vegetation Communities and Land Cover Types¹

Vegetation Community/ Land Cover Type	Multi-Use	Riverwalk River Park ²	Wetland Restoration		Fashion Valley Road Improvements		Riverwalk Project Total
			Wetland Mitigation ³	B15 ⁴	Permanent	Temporary	
Wetland/Riparian							
Southern cottonwood- willow riparian forest	0.00	0.00	0.00	0.00	0.34 (0.34)	0.23 (0.23)	0.57 (0.57)
Disturbed southern cottonwood-willow riparian forest	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Southern willow scrub	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Disturbed southern willow scrub	0.05 ⁴	0.00	0.00	0.00	0.00	0.00	0.05
Coastal and valley freshwater marsh	0.00	0.00	0.00	0.00	<0.01 (<0.01)	0.01 (0.01)	0.01 (0.01)
Emergent wetland	0.11 ⁴	0.00	0.00	0.00	0.00	0.00	0.11
Open water	0.00	0.00	0.00	0.00	0.00	0.06 (0.06)	0.06 (0.06)
Subtotal	0.16	0.00	0.00	0.00	0.34 (0.34)	0.30(0.30)	0.80 (0.64)
Other Uplands (Tier IV)							
Disturbed land	6.72	0.00	0.00	0.00	0.00	0.00	6.72
Land Cover							
Urban/Developed	91.83 (0.09)	62.69	0.81 (0.81)	12.69 (12.45)	0.64 (0.50)	0.03 (0.03)	168.69 (13.88)
TOTAL	98.71 (0.09)	62.69	0.81 (0.81)	12.69 (12.45)	0.98 (0.84)	0.33 (0.33)	176.21 (14.52)

¹Numbers in parentheses is the acreage that is in the MHPA

²Includes both passive and active Riverwalk River Park areas

³On-site wetland habitat mitigation area for project impacts

⁴Wetland habitat re-establishment area could serve as a future wetland habitat mitigation bank; however additional approvals from wildlife agencies would be required.

To accommodate the B15 requirement, the project would expand existing wetland/riparian features within and adjacent to the existing San Diego River channel. The overall restoration includes 11.54 acres of wetland habitat enhancement, 13.32 acres of creation, as well as 0.30 acre of restoration of habitat temporarily impacted by the Fashion Valley Road improvements. This activity is a requirement of MSCP guideline B15 and is, therefore, an allowable activity. No wetland impacts are anticipated from the restoration activities along the San Diego River proposed to implement B 15 of the MSCP.

Impacts to Tier IV Other Uplands (i.e., disturbed land) and impacts to urban/developed land would not meet any criterion for significance. Therefore, these impacts would be less than significant.

Sensitive Biological Resources

Sensitive Plant Species. No sensitive plant species were observed or are expected to occur on-site; therefore, no impacts to sensitive plant species are expected.

Sensitive Animal Species. All sensitive animal species observed or detected on-site utilize wetland/riparian habitats and were observed or detected along the San Diego River channel. The project would avoid direct impacts to the sensitive species observed or detected on-site including Cooper's hawk, Clark's marsh wren, willow flycatcher, yellow-breasted chat, double-crested cormorant, yellow warbler, light-footed Ridgway's rail, western bluebird, and least Bell's vireo through pre-construction and nest avoidance measures as a part of Biological Resource Protection Measures for the project. Furthermore, impacts to sensitive animal species listed above are not anticipated because a buffer around them would be provided.

The Riverwalk River Park portion of the project includes planting of native wetland species to create native habitats adjacent to the San Diego River and the existing wetlands in the southwestern portion of the project site, which would potentially create additional habitat for these species. The native areas would not have any active park uses in them—only passive uses. Expansion and enhancement of existing wetland habitats associated with the implementation of B15 of the MSCP could also potentially increase habitat for sensitive species on-site.

Jurisdictional Wetland Areas

The proposed development of the project would result in direct impacts to approximately 0.41 acre of wetland Waters of the U.S., 0.64 acre of wetland Waters of the State, and 0.64 acre of City Wetlands.

There would be no impacts to jurisdictional waters and wetlands from the grading required for the Riverwalk River Park or the wetland restoration proposed by the project, because these activities would occur in what is presently golf course (i.e., urban/developed land). Expansion of the San Diego River channel would involve removal of fairways, tee boxes, greens, cart paths, water features, and bunkers, and the habitat creation area would be graded to create an expanded channel area

that is at an elevation within two – four feet of the existing channel bottom. This grading would occur adjacent to the existing channel but would not breach the channel or encroach upon any of the existing wetland habitat. Drainage A has been determined not to be a City Wetland, and therefore a wetland deviation for the mixed-use component of the project is not required.

Impacts to City Wetlands from proposed improvements to Fashion Valley Road (0.64 acre of coastal and valley freshwater marsh, southern cottonwood-willow riparian forest, and open water) are considered significant and unavoidable. Improvements to Fashion Valley Road are necessary to reduce flooding of the current roadway during storm events that makes vehicular crossing of the San Diego River at this location impossible. Fashion Valley Road is classified as a four-lane Major and a community element roadway in the Mission Valley Community Plan. Because Fashion Valley Road is the only existing roadway that crosses the San Diego River in the immediate vicinity, wetland impacts resulting from improvements to this roadway are unavoidable.

The City Biology Guidelines and ESL Regulations identify that impacts to wetlands should be avoided, and unavoidable impacts should be minimized to the extent practicable. Therefore, a deviation from the City's ESL wetland regulations would be required. Deviations from the wetland regulations shall not be granted unless a development qualifies to be processed as one of these three options: Essential Public Projects Option, Economic Viability Option, and Biologically Superior Option.

The Fashion Valley Road improvements would qualify for a deviation under the EPP Option based on the criteria (in *italic*) as outlined below:

- *The project must be an EPP (i.e., circulation element road, trunk sewer, water main) that will service the community at large and not just a single development project or property.*

Fashion Valley Road connects Friars Road in the north with Hotel Circle North in the south, providing a crossing of the San Diego River, and it provides access to Fashion Valley Mall and Fashion Valley Transit Center to the east, as well as access to the project site to the west. Therefore, improvements to Fashion Valley Road as part of the project would serve the community at large and not just the project. The project proposes to widen Fashion Valley Road to a four-lane major arterial roadway, per its ultimate classification in the Mission Valley Community Plan which call for widening the road, which accounts for the majority of the impact.

- *. Alternatives must include the following: 1) a no project alternative; 2) a wetlands avoidance alternative, including an analysis of alternative sites irrespective of ownership; and 3) an appropriate range of substantive wetland impact minimization alternatives. Public review of the environmental document must occur pursuant to the provisions of CEQA.*

The following wetland alternatives for Fashion Valley Road improvements are addressed below, accordance with the ESL Regulations: No Project Alternative, Wetlands Avoidance Alternative, and Riverwalk Specific Plan project.

No Project Alternative

The No Project Alternative would result in no improvements to the Fashion Valley Road crossing of the river and would allow continued flooding of the roadway and areas upstream during heavy or prolonged rainfall events. Upstream flooding could result in soil erosion, removal of habitat, and wildlife displacement and/mortality. Therefore, a No Project alternative is considered impracticable for avoidance of impacts to biological resources.

Wetlands Avoidance Alternatives

Fashion Valley Road is the only existing roadway that crosses the river in the immediate vicinity, no alternative site exists for improvements to a roadway crossing of the San Diego River that would alleviate the flooding impacts to the roadway and immediate environs. Therefore, there is no other location suitable for the crossing.

Avoidance of wetland impacts would be possible with a spanned bridge; however, a spanned bridge solution would require significantly raising the entire profile of the roadway, which is not feasible due to adjacent property constraints (MTS trolley track and station).

Wetland Impact Minimalization Alternatives

A traditional river crossing for the Fashion Valley Road improvements to minimize impacts would involve in-channel structural supports/culverts and would not allow for an open span of the river, nor would a soft channel bottom be left underneath. This approach would be expected to have the greatest permanent wetland impacts of all alternatives considered.

A larger Con/Span arch crossing for Fashion Valley Road improvements construction would serve as a wetland minimalization alternative. However, construction of this alternative would require a much larger footprint with deeper supports, more temporary and permanent wetland impacts, and only a marginal increase in the soft bottom channel with essentially the same flood conveyance properties over the proposed arch culvert.

Fashion Valley Road improvements

The Fashion Valley Road improvements proposes a Con/Span arch which presents the best way to meet flood conveyance goals, minimize impacts to wetlands, and provide street operations needs for Fashion Valley Road. The Con/Span arch would replace the existing pipe culverts and have the least wetland impacts when compared to the wetland alternatives considered. The arch footing would be buried beneath and adjacent to the roadway allowing the channel to be maintained with a soft bottom rather than concrete lined.

Grading for the Con/Span arch is needed to ensure the integrity of the arch structure and to protect adjacent properties should there be a major flood. Sufficient cleared workspace is needed for excavation and diverting the river so allow the contractor the ability to can get in and get out as quickly as possible in order to minimize potential construction and flooding issues, as well as time spent working in the river (estimated to be approximately seven months).

Temporary construction impacts to City Wetlands from the proposed Con/Span arch would be 0.30 acre. The arch would be buried below ground and would not be identifiable a few years after construction due to revegetation with natives. Permanent impacts (0.34 acre) would occur from retaining walls that could have buried footings and/or piles similar to the arch. It should be noted that no distinction is made between permanent and temporary impacts; mitigation for these impacts will be provided at the same ratio. This is described in greater detail in Mitigation Measure 5.4-2 below.

- *The potential impacts to wetland resources shall be minimized to the maximum extent practicable and the project shall be the least environmentally damaging practicable biological alternative considering all the technical constraints of the project (e.g., roadway geometry, slope stability, geotechnical hazards, etc.). Recognizing the wetland resources involved, minimization to the maximum extent practicable may include, but is not limited to, adequate buffers and/or designs that maintain full hydrologic function and wildlife movement (e.g., pipeline tunneling, bridging, Arizona crossings, arch culverts). The project applicant will solicit input from the U.S. Fish and Wildlife Service and the California Department of Fish and Game (e.g., Wildlife Agencies) prior to the first public hearing.*

As previously discussed, the Con/Span arch culvert is a pre-fabricated structure that would minimize impacts associated with construction by having an overall footprint that is less than a traditionally constructed in-place bridge or larger Con/Span arch. Also, a constructed in-place feature would require central supports and not be a truly open span like a Con/Span arch. Different Con/Span options were evaluated, and the one proposed for use is the least impactful that would serve the Fashion Valley Road improvements needs. The Con/Span arch would solve current roadway flooding issues, and because the existing pipe culverts would be removed and it would span the river channel, the new roadway river crossing would improve wildlife movement in the river corridor.

Applicant met with Wildlife Agencies on June 21, 2019. Issues surrounding the project were addressed, and Wildlife Agency staff provided direction regarding how to address the Ridgeway's rail, as well as requested that measures to avoid impacts be incorporated into the project. Following the meeting, USFW staff provided standard Ridgeway's rail avoidance measures, which have been incorporated into the project.

- *All impacts shall be mitigated according to the requirements of Table 2a and the project shall not have a significant adverse impact to the MSCP.*

The project would comply with these requirements for Fashion Valley Road improvements (including the area of overlap with Town and Country Resort Hotel restoration enhancement area outside of Site Development Permit #400602 required mitigation area).

Specifically, mitigation measures MM 5.4-1, 5.4-2 and 5.4-4 would be required for the project. Mitigation provided would be in accordance with the requirements of Table 2a of the City's Biology

Guidelines. The City does not distinguish between permanent and temporary impacts, all impacts to wetlands would be mitigated as permanent impacts. The Fashion Valley Road improvements would impact and area outside of the restoration enhancement obligation under Town and Country Resort Hotel. Site Development Permit No. 400602 required mitigation area. Therefore, the mitigation provided for the impacts in this area from the Fashion Valley Road improvements meet the requirements of Table 2a, and the Riverwalk Project is not required to increase its mitigation for the overlapping impacts as it is not a mitigation area.

Wildlife Movement Corridor

The project would not result in direct impacts to the MHPA that includes the San Diego River, which is a corridor for conservation to provide the necessary habitat quality, quantity, and connectivity to sustain the unique biodiversity of the San Diego region. Therefore, the project would not substantially interfere with wildlife movement or impede the use of wildlife nursery sites. Impacts would be less than significant.

The spanned crossing features for Fashion Valley Road would replace the existing pipe culverts, and the new roadway river crossing would improve wildlife movement in the river corridor. The proposed Riverwalk River Park would also facilitate wildlife movement through the creation and enhancement of native habitats along the San Diego River and the existing wetlands. Park restrictions precluding active uses adjacent to the channel also are expected to accommodate wildlife use of the river corridor.

The project would sustain wildlife use through the site by maintaining and expand the wetland habitat area along the existing channel. Additionally, the establishment of a 50-foot no use buffer to the wetland habitats would facilitate use of the channel by wildlife, particular at night when the passive and active components of the park would be closed. The planting of native species along the river channel and within the passive and active parks also would provide more cover for animals than is presently provided by the golf course.

Indirect Impacts

Indirect effects listed in the City's Subarea Plan include those from drainage, toxics, lighting, noise, barriers, invasives, brush management, and grading/land development. The project site includes areas within and adjacent to the MHPA; therefore, conformance with the MSCP Adjacency Guidelines would be required to ensure that indirect impacts into the MHPA are minimized. The 50-foot no use buffer adjacent to the MHPA would facilitate the avoidance of indirect impacts through its passive uses that would not create excessive noise and through the boulders or deterrent vegetation that would be installed to deter entrance into the buffer. See Section 5.1, *Land Use*, for a detailed discussion of indirect impacts and the MHPA Adjacency Guidelines. Conformance with the MHPA LUAGs would become conditions of project approval.

Fugitive Dust

Fugitive dust produced by construction could disperse onto adjacent native vegetation (inside and outside the MHPA). A continual cover of dust may reduce the overall vigor of individual plants by reducing their photosynthetic capabilities and increasing their susceptibility to pests or disease. This, in turn, could affect animals dependent on these plants (e.g., seed-eating rodents). Fugitive dust also may make plants unsuitable as habitat for insects and birds. Construction of the project would include the use of dust control measures required in SDMC Section 142.0101 et seq. These measures could include, for example, reduced driving speeds on unpaved roads and regular watering of dirt surfaces. Therefore, project construction would result in less-than-significant impacts.

Noise

As discussed in Section 5.1, *Land Use*, and in Section 5.8, *Noise*, with the exception of potential noise impacts associated with construction, the project would not result in indirect impacts. Construction-related noise from such sources as clearing, grading, and construction vehicular traffic from the project could result in a significant temporary impact to wildlife, if species sensitive to noise are present at the time of construction. Post-construction noise impacts from active park uses on sensitive species with potential to occur are not anticipated.

Significant impacts would occur if the least Bell's vireo, southwestern willow flycatcher are present, construction occurs during the period March 15 through September 15 (May 1 and September 1 for the flycatcher), and construction noise levels exceed 60 decibels dBA hourly average (or to the ambient noise level if it already exceeds 60 dB (A) hourly average) at the edge of occupied habitat. The specific avoidance measures for the light-footed Ridgway's rail have been identified for the project and would be included as conditions of approval for the project. Because the State Fully Protected light-footed Ridgway's rail (*Rallus obsoletus levipes*) is known to occur along the San Diego River in the MHPA on-site, and California Fish and Game Code does not allow for incidental take of Fully Protected Species, the project would implement the following measures, as applicable, to avoid direct and indirect impacts to the species.

To avoid direct impacts to the light-footed Ridgway's rail during project construction, removal of habitat that supports the rail would occur outside of the breeding season for this species (March 15 to September 15). If removal of habitat must occur during the breeding season, however, a qualified biologist (possessing a valid Endangered Species Act section 10(a)(1)(a) recovery permit) would conduct a pre-construction survey to determine the presence or absence of this species in the proposed area of disturbance. The pre-construction survey would be conducted within 10 calendar days prior to the start of construction activities (including removal of vegetation). The results of the pre-construction survey would be submitted to the City Development Services Department for review and approval prior to initiating any construction activities. If the light-footed Ridgway's rail is 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.) would be prepared and include proposed measures to

be implemented to ensure that direct impacts to this species are avoided. The report or mitigation plan would be submitted to the City and Wildlife Agencies for review and approval and implemented to their satisfaction.

To avoid indirect impacts to the light-footed Ridgway's rail, the following measures have been incorporated into the project. These measures would be conditions of project approval in addition to the MHPA LUAGs.

The active park facilities proposed for the Riverwalk River Park would be designed/located such that noise from their use would not be louder than the current (pre-project) ambient noise levels within the current extent of the wetland/riparian habitat of the San Diego River on-site.

Additionally, the following requirements regarding the light-footed Ridgway's rail would be shown on the construction plans.

No clearing, grubbing, grading, or other construction activities shall occur between March 15 and September 15, the breeding season of the light-footed Ridgway's rail, until the following requirements have been met to the satisfaction of the city manager and Wildlife Agencies (CDFW and USFWS):

- A. A qualified biologist (possessing a valid endangered species act section 10(a)(1)(a) recovery permit) shall survey those wetland areas that would be subject to construction noise levels exceeding 60 decibels dBA hourly average for the presence of the light-footed Ridgway's rail. Surveys for this species shall be conducted pursuant to the protocol survey guidelines established by the U.S. Fish and Wildlife Service within the breeding season prior to the commencement of construction. If the least bell's vireo is present, then the following conditions must be met:

Between March 15 and September 15, no clearing, grubbing, or grading of occupied light-footed Ridgway's rail habitat shall be permitted. Areas restricted from such activities shall be staked or fenced under the supervision of a qualified biologist; and

1. Between March 15 and September 15, no construction activities shall occur within any portion of the site where construction activities would result in noise levels the current, pre-construction ambient hourly average at the edge of occupied light-footed Ridgway's rail habitat. An analysis showing that noise generated by construction activities would not exceed the current, pre-construction ambient hourly average at the edge of occupied habitat must be completed by a qualified acoustician (possessing current noise engineer license or registration with monitoring noise level experience with listed animal species) and approved by the City Manager at least two weeks prior to the commencement of construction activities. Prior to the commencement of any of construction activities during the breeding season, areas restricted from such activities

shall be staked or fenced under the supervision of a qualified biologist; or

2. At least two weeks prior to the commencement of construction activities, under the direction of a qualified acoustician, noise attenuation measures (e.g., berms, walls) shall be implemented to ensure that noise levels resulting from construction activities would not exceed the current, pre-construction ambient hourly average at the edge of habitat occupied by the light-footed Ridgway's rail. Concurrent with the commencement of construction activities and the construction of necessary noise attenuation facilities, noise monitoring* shall be conducted at the edge of the occupied habitat area to ensure that noise levels do not exceed the current, pre-construction ambient hourly average. If the noise attenuation techniques implemented are determined to be inadequate by the qualified acoustician or biologist, then the associated construction activities shall cease until such time that adequate noise attenuation is achieved or until the end of the breeding season (September 16).

* Construction noise monitoring shall continue to be monitored at least twice weekly on varying days, or more frequently depending on the construction activity, to verify that noise levels at the edge of occupied habitat are maintained at no more than the current, pre-construction ambient hourly average. If not, other measures shall be implemented in consultation with the biologist and the City Manager, as necessary, to reduce noise levels to the current, pre-construction ambient hourly average. Such measures may include, but are not limited to, limitations on the placement of construction equipment and the simultaneous use of equipment.

- B. If the light-footed Ridgway's rail is not detected during the protocol survey, the qualified biologist shall submit substantial evidence to the City Manager and applicable resource agencies which demonstrates whether or not mitigation measures such as noise walls are necessary between March 15 and September 15 as follows:
 1. If this evidence indicates the potential is high for light-footed Ridgway's rail to be present based on historical records or site conditions, then condition a.iii shall be adhered to as specified above.
 2. If this evidence concludes that no impacts to this species are anticipated, no mitigation measures would be necessary.

Also, to further avoid indirect impacts to the light-footed Ridgway's rail, the MHPA Land Use Adjacency Guidelines would be conditions of project approval.

Avian Collisions

According to the USFWS (2016):

Glass reflectivity and transparency create a lethal illusion of clear airspace that birds do not see as a barrier. During the daytime, birds collide with windows because they see reflections of the landscape in the glass (e.g., clouds, sky, vegetation, or the ground); or they see through glass to perceived habitat (including potted plants or vegetation inside buildings) or to the sky on the other side...The majority of collisions with both residential and urban buildings happen during the day,

as birds fly around looking for food... avian mortalities at night more frequently occur at communication towers, offshore drilling platforms and in other situations where there is a bright light source in a dark area, especially during inclement weather.

To the extent practicable, the project would incorporate architectural design (windows/glass) and landscaping that is consistent with American Bird Conservancy Bird-Friendly Design (Sheppard and Phillips 2015) to minimize the potential for avian collisions with windows/glass and landscaping associated with the project. These architectural design measures are included in Chapter 6.0 of the Riverwalk Specific Plan. Impacts would be less-than-significant.

Mitigation Measures

MM 5.4-1: Biological Resources (Protection During Construction)

Prior to issuance of any construction permits, including but not limited to, the first Grading Permit, Demolition Plans/Permits and Building Plans/Permits, or beginning any construction-related activity on-site, but prior to the first preconstruction, for lots south of the MTS Trolley Tracks (Lots 32-40, 43-52, TT, UU, VV, WW, XX, YY, ZZ, AAA, BBB, CCC, DDD, or EEE as shown on VTM 2213361) the Development Services Department (DSD) Environmental Designee (ED) shall review and approve all construction documents (plans, specifications, details, etc.) to ensure the MMRP requirements are incorporated.

I. Prior to Construction

- A. **Biologist Verification:** The owner/permittee shall provide a letter to the City's Mitigation Monitoring Coordination (MMC) section stating that a Project Biologist (Qualified Biologist) as defined in the City of San Diego's Biological Guidelines (2012), has been retained to implement the project's biological monitoring program. The letter shall include the names and contact information of all persons involved in the biological monitoring of the project.
- B. **Preconstruction Meeting:** The Qualified Biologist shall attend the preconstruction meeting, discuss the project's biological monitoring program, and arrange to perform any follow up mitigation measures and reporting including site-specific monitoring, restoration or revegetation, and additional fauna/flora surveys/salvage.
- C. **Biological Documents:** The Qualified Biologist shall submit all required documentation to MMC verifying that any special mitigation reports including but not limited to, maps, plans, surveys, survey timelines, or buffers are completed or scheduled per City Biology Guidelines, Multiple Species Conservation Program (MSCP), Environmentally Sensitive Lands Ordinance (ESL), project permit conditions; California Environmental Quality Act (CEQA); endangered species acts (ESAs); and/or other local, state or federal requirements.

- D. **BCME:** The Qualified Biologist shall present a Biological Construction Mitigation/Monitoring Exhibit (BCME) which includes the biological documents in C above. In addition, include: restoration/revegetation plans, plant salvage/relocation requirements (e.g., coastal cactus wren plant salvage, burrowing owl exclusions, etc.), avian or other wildlife surveys/survey schedules (including general avian nesting and USFWS protocol), timing of surveys, wetland buffers, avian construction avoidance areas/noise buffers/ barriers, other impact avoidance areas, and any subsequent requirements determined by the Qualified Biologist and the City ADD/MMC. The BCME shall include a site plan, written and graphic depiction of the project's biological mitigation/monitoring program, and a schedule. The BCME shall be approved by MMC and referenced in the construction documents.
- E. **Avian Protection Requirements:** To avoid any direct impacts to the Clark's marsh wren, Cooper's hawk, double-crested cormorant, yellow warbler, yellow breasted chat, western bluebird, least Bell's vireo, southwestern willow flycatcher, and the light-footed Ridgway's rail, 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 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 pre-construction survey to City DSD for review and approval prior to initiating any construction activities. If nesting Clark's marsh wren, Cooper's hawk, double-crested cormorant, yellow warbler, yellow breasted chat, western bluebird, least Bell's vireo, southwestern willow flycatcher, and the light-footed Ridgway's rail 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 for review and approval and implemented to the satisfaction of the City. The City's MMC Section 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.
- F. **Resource Delineation:** Prior to construction activities, the Qualified Biologist shall supervise the placement of orange construction fencing or equivalent along the limits of disturbance adjacent to sensitive biological habitats and verify compliance with any other project conditions as shown on the BCME. This phase shall include flagging plant specimens and delimiting buffers to protect sensitive biological resources (e.g., habitats/flora & fauna species, including nesting birds) during construction. Appropriate steps/care should be taken to minimize attraction of nest predators to the site.

- G. **Education:** Prior to commencement of construction activities, the Qualified Biologist shall meet with the owner/permittee or designee and the construction crew and conduct an on-site educational session regarding the need to avoid impacts outside of the approved construction area and to protect sensitive flora and fauna (e.g., explain the avian and wetland buffers, flag system for removal of invasive species or retention of sensitive plants, and clarify acceptable access routes/methods and staging areas, etc.).

II. During Construction

- A. **Monitoring:** All construction (including access/staging areas) shall be restricted to areas previously identified, proposed for development/staging, or previously disturbed as shown on "Exhibit A" and/or the BCME. The Qualified Biologist shall monitor construction activities as needed to ensure that construction activities do not encroach into biologically sensitive areas, or cause other similar damage, and that the work plan has been amended to accommodate any sensitive species located during the pre-construction surveys. In addition, the Qualified Biologist shall document field activity via the Consultant Site Visit Record (CSVR). The CSVR shall be e-mailed to MMC on the 1st day of monitoring, the 1st week of each month, the last day of monitoring, and immediately in the case of any undocumented condition or discovery.
- B. **Subsequent Resource Identification:** The Qualified Biologist shall note/act to prevent any new disturbances to habitat, flora, and/or fauna onsite (e.g., flag plant specimens for avoidance during access, etc). If active nests of the Clark's marsh wren, Cooper's hawk, double-crested cormorant, yellow warbler, yellow breasted chat, western bluebird, least Bell's vireo, southwestern willow flycatcher, and the light-footed Ridgway's rail or other previously unknown sensitive resources are detected, all project activities that directly impact the resource shall be delayed until species specific local, state or federal regulations have been determined and applied by the Qualified Biologist.

III. Post Construction Measures

- A. In the event that impacts exceed previously allowed amounts, additional impacts shall be mitigated in accordance with City Biology Guidelines, ESL and MSCP, State CEQA, and other applicable local, state and federal law. The Qualified Biologist shall submit a final BCME/report to the satisfaction of the City ADD/MMC within 30 days of construction completion.

MM 5.4-2:

Biological Resources Wetlands

Prior to issuance of 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

for public improvements or impacts associated with the construction of Fashion Valley Road between Riverwalk Drive and Hotel Circle North., the Owner/Permittee shall mitigate for City wetland/riparian vegetation impacts to 0.64-acre (0.01 acre of coastal and valley freshwater marsh, 0.57 acre of southern cottonwood-willow riparian forest) and 0.06-acre of open water. Mitigation for impacts to City jurisdictional wetlands shall occur at a 3:1 mitigation-to-impact ratio in accordance with Table 2a of the City's Biology Guidelines. Accordingly, mitigation for City wetland/riparian impacts shall include a 1:1 creation component to ensure no net loss of wetlands and a 2:1 restoration/enhancement component. The Owner/Permittee shall provide 1.92 acres of habitat and shall be achieved on-site via the following, as detailed in the *Riverwalk Project Wetland Mitigation Plan* (Alden Environmental, Inc. February 19, 2020):

- Creation of 0.21-acre of freshwater marsh riparian and 0.57-acre of southern cottonwood-willow riparian forest
- Enhancement of 1.14-acres of southern cottonwood-willow riparian forest

Biological Resources Other Resources Agency Permits

Prior to issuance of 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 for public improvements or impacts associated with the construction of Fashion Valley Road between Riverwalk Drive and Hotel Circle North, whichever is applicable, the Owner/Permittee shall provide evidence of the following permits: a 404 permit from U.S. Army Corps of Engineers, 401 Certification from Regional Water Quality Control Board, and a 1602 streambed alteration agreement from the California Department of Fish and Wildlife. Evidence shall include copies of permit(s) issued, letter of resolution(s) by the responsible agency documenting compliance, or other evidence documenting compliance deemed acceptable by MSCP, DSD, and MMC.

MM 5.4-3: Biological Resources (Revegetation Plan)

Prior to issuance of 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 for public improvements or impacts associated with the construction of Fashion Valley Road between Riverwalk Drive and Hotel Circle North, the Assistant Deputy Director (ADD) environmental designee of the City's Land Development Review Division (LDR) shall verify that the following statements are shown verbatim on the grading and/or construction plans as a note under the heading *Environmental Requirements*: "Riverwalk Specific Plan" is subject to Mitigation, Monitoring and Reporting Program and shall conform to the mitigation conditions as contained in the "Environmental Impact Report PTS. No. 581984 / SCH No. 2018041028."

Prior to Permit Issuance

- A. Land Development Review (LDR) Plan Check
 1. Prior to issuance for any construction permits, including but not limited to, the first Grading Permit, Demolition Plans/Permits and Building Plans/Permits, whichever is applicable, the ADD environmental designee shall verify that the requirements for

the revegetation/restoration plans and specifications, including mitigation of direct impacts to City wetland/riparian vegetation impacts to 0.64-acre (0.01 acre of coastal and valley freshwater marsh, 0.57 acre of southern cottonwood-willow riparian forest) and 0.06-acre of open water, and the remaining restoration revegetation onsite subjected to MSCP B15 requirements shall be shown and noted on the appropriate landscape construction documents. The landscape construction documents and specifications must be found to be in conformance with the *Habitat Restoration Plan*, prepared by Alden Environmental, Inc., February 19, 2020, the requirements of which are summarized below:

B. Revegetation/Restoration Plan(s) and Specifications

1. Landscape Construction Documents (LCD) shall be prepared on D-sheets and submitted to the City of San Diego Development Services Department, Landscape Architecture Section (LAS) for review and approval. LAS shall consult with Mitigation Monitoring Coordination (MMC) and obtain concurrence prior to approval of LCD. The LCD shall consist of revegetation/restoration, planting, irrigation and erosion control plans; including all required graphics, notes, details, specifications, letters, and reports as outlined below.
2. Landscape Revegetation/Restoration Planting and Irrigation Plans shall be prepared in accordance with the San Diego Land Development Code (LDC) Chapter 14, Article 2, Division 4, the LDC Landscape Standards submittal requirements, and Attachment "B" (General Outline for Revegetation/Restoration Plans) of the City of San Diego's LDC Biology Guidelines (2018). The Principal Qualified Biologist (PQB) shall identify and adequately document all pertinent information concerning the revegetation/restoration goals and requirements, such as but not limited to, plant/seed palettes, timing of installation, plant installation specifications, method of watering, protection of adjacent habitat, erosion and sediment control, performance/success criteria, inspection schedule by City staff, document submittals, reporting schedule, ect. The LCD shall also include comprehensive graphics and notes addressing the ongoing maintenance requirements (after final acceptance by the City).
3. The Revegetation Installation Contractor (RIC), Revegetation Maintenance Contractor (RMC), Construction Manager (CM) and Grading Contractor (GC), where applicable shall be responsible to insure that for all grading and contouring, clearing and grubbing, installation of plant materials, and any necessary maintenance activities or remedial actions required during installation and the 120-day plant establishment period are done per approved LCD. The following procedures at a minimum, but not limited to, shall be performed:
 - a. The RMC shall be responsible for the maintenance of the wetland/riparian mitigation area for a minimum period of 120-days. Maintenance visits shall be conducted on a weekly basis throughout the plant establishment period.

- b. At the end of the 120-day period the PQB shall review the mitigation area to assess the completion of the short-term plant establishment period and submit a report for approval by MMC.
 - c. MMC will provide approval in writing to begin the five-year long-term establishment/maintenance and monitoring program.
 - d. Existing indigenous/native species shall not be pruned, thinned or cleared in the revegetation/mitigation area.
 - e. The revegetation site shall not be fertilized.
 - f. The RIC is responsible for reseeding (if applicable) if weeds are not removed, within one week of written recommendation by the PQB.
 - g. Weed control measures shall include the following: (1) hand removal, (2) cutting, with power equipment, and (3) chemical control. Hand removal of weeds is the most desirable method of control and will be used wherever possible.
 - h. Damaged areas shall be repaired immediately by the RIC/RMC. Insect infestations, plant diseases, herbivory, and other pest problems will be closely monitored throughout the five-year maintenance period. Protective mechanisms such as metal wire netting shall be used as necessary. Diseased and infected plants shall be immediately disposed of off-site in a legally acceptable manner at the discretion of the PQB or Qualified Biological Monitor (QBM) (City approved). Where possible, biological controls will be used instead of pesticides and herbicides.
4. If a Brush Management Program is required the revegetation/restoration plan shall show the dimensions of each brush management zone and notes shall be provided describing the restrictions on planting and maintenance and identify that the area is impact neutral and shall not be used for habitat mitigation/credit purposes.
- C. Letters of Qualification Have Been Submitted to ADD
- 1. The applicant shall submit, for approval, a letter verifying the qualifications of the biological professional to MMC. This letter shall identify the PQB, Principal Restoration Specialist (PRS), and QBM, where applicable, and the names of all other persons involved in the implementation of the revegetation/restoration plan and biological monitoring program, as they are defined in the City of San Diego Biological Review References. Resumes and the biology worksheet should be updated annually.
 - 2. MMC will provide a letter to the applicant confirming the qualifications of the PQB/PRS/QBM and all City Approved persons involved in the revegetation/restoration plan and biological 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 revegetation/restoration plan and biological monitoring of the project.
 - 4. PBQ must also submit evidence to MMC that the PQB/QBM has completed Storm Water Pollution Prevention Program (SWPPP) training.

Prior to Start of Construction

- A. PQB/PRS Shall Attend Preconstruction (Precon) Meetings
 - 1. Prior to beginning any work that requires monitoring:
 - a. The owner/permittee or their authorized representative shall arrange and perform a Precon Meeting that shall include the PQB or PRS, Construction Manager (CM) and/or Grading Contractor (GC), Landscape Architect (LA), Revegetation Installation Contractor (RIC), Revegetation Maintenance Contractor (RMC), Resident Engineer (RE), Building Inspector (BI), if appropriate, and MMC.
 - b. The PQB shall also attend any other grading/excavation related Precon Meetings to make comments and/or suggestions concerning the revegetation/restoration plan(s) and specifications with the RIC, CM and/or GC.
 - c. If the PQB is unable to attend the Precon Meeting, the owner shall schedule a focused Precon Meeting with MMC, PQB/PRS, CM, BI, LA, RIC, RMC, RE and/or BI, if appropriate, prior to the start of any work associated with the revegetation/restoration phase of the project, including site grading preparation.
 - 2. Where Revegetation/Restoration Work Will Occur
 - a. Prior to the start of any work, the PQB/PRS shall also submit a revegetation/restoration monitoring exhibit (RRME) based on the appropriate reduced LCD (reduced to 11"x 17" format) to MMC, and the RE, identifying the areas to be revegetated/restored including the delineation of the limits of any disturbance/grading and any excavation.
 - b. PQB shall coordinate with the construction superintendent to identify appropriate Best Management Practices (BMP) on the RRME.
 - 3. When Biological Monitoring Will Occur
 - a. Prior to the start of any work, the PQB/PRS shall also submit a monitoring procedures schedule to MMC and the RE indicating when and where biological monitoring and related activities will occur.
 - 4. PQB Shall Contact MMC to Request Modification
 - a. The PQB may submit a detailed letter to MMC prior to the start of work or during construction requesting a modification to the revegetation/restoration plans and specifications. This request shall be based on relevant information (such as other sensitive species not listed by federal and/or state agencies and/or not covered by the MSCP and to which any impacts may be considered significant under CEQA) which may reduce or increase the potential for biological resources to be present.

During Construction

- A. PQB or QBM Present During Construction/Grading/Planting
 - 1. The PQB or QBM shall be present full-time during construction activities including but not limited to, site preparation, cleaning, grading, excavation, landscape establishment in association with demolition and construction of Fashion Valley Road improvements which would result in impacts to sensitive biological resources

as identified in the LCD and on the RRME. **The RIC and/or QBM are responsible for notifying the PQB/PRS of changes to any approved construction plans, procedures, and/or activities. The PQB/PRS is responsible to notify the CM, LA, RE, BI and MMC of the changes.**

2. The PQB or QBM shall document field activity via the Consultant Site Visit Record Forms (CSVr). The CSVr's shall be faxed by the CM the first day of monitoring, the last day of monitoring, monthly, and in the event that there is a deviation from conditions identified within the LCD and/or biological monitoring program. The RE shall forward copies to MMC.
3. The PQB or QBM shall be responsible for maintaining and submitting the CSVr at the time that CM responsibilities end (i.e., upon the completion of construction activity other than that of associated with biology).
4. All construction activities (including staging areas) shall be restricted to the development areas as shown on the LCD. The PQB/PRS or QBM staff shall monitor construction activities as needed, with MMC concurrence on method and schedule. This is to ensure that construction activities do not encroach into biologically sensitive areas beyond the limits of disturbance as shown on the approved LCD.
5. The PQB or QBM shall supervise the placement of orange construction fencing or City approved equivalent, along the limits of potential disturbance adjacent to (or at the edge of) all sensitive habitats including southern cottonwood-willow riparian forest, southern willow scrub, coastal and valley freshwater marsh, emergent wetland, and open water: Clark's marsh wren, Cooper's hawk, double-crested cormorant, yellow warbler, yellow breasted chat, western bluebird, least Bell's vireo, southwestern willow flycatcher, and the light-footed Ridgway's, as shown on the approved LCD.
6. The PBQ shall provide a letter to MMC that limits of potential disturbance has been surveyed, staked and that the construction fencing is installed properly.
7. The PQB or QBM shall oversee implementation of BMP, such as gravel bags, straw logs, silt fences or equivalent erosion control measures, as needed to ensure prevention of any significant sediment transport. In addition, the PQB/QBM shall be responsible to verify the removal of all temporary construction BMP upon completion of construction activities. Removal of temporary construction BMP shall be verified in writing on the final construction phase CSVr.
8. PQB shall verify in writing on the CSVr's that no trash stockpiling or oil dumping, fueling of equipment, storage of hazardous wastes or construction equipment/material, parking or other construction related activities shall occur adjacent to sensitive habitat. These activities shall occur only within the designated staging area located outside the area defined as biological sensitive area.
9. The long-term establishment inspection and reporting schedule per LCD must all be approved by MMC prior to the issuance of the Notice of Completion (NOC) or any bond release.

B. Disturbance/Discovery Notification Process

1. If unauthorized disturbances occur or sensitive biological resources are discovered that were not previously identified on the LCD and/or RRME, the PQB or QBM shall direct the contractor to temporarily divert construction in the area of disturbance or discovery and immediately notify the RE or BI, as appropriate.
 2. The PQB shall also immediately notify MMC by telephone of the disturbance and report the nature and extent of the disturbance and recommend the method of additional protection, such as fencing and appropriate Best Management Practices (BMP). After obtaining concurrence with MMC and the RE, PQB and CM shall install the approved protection and agreement on BMP.
 3. The PQB shall also submit written documentation of the disturbance to MMC within 24 hours by fax or email with photos of the resource in context (e.g., show adjacent vegetation).
- C. Determination of Significance
1. The PQB shall evaluate the significance of disturbance and/or discovered biological resource and provide a detailed analysis and recommendation in a letter report with the appropriate photo documentation to MMC to obtain concurrence and formulate a plan of action which can include fines, fees, and supplemental mitigation costs.
 2. MMC shall review this letter report and provide the RE with MMC's recommendations and procedures.

Post Construction

- A. Mitigation Monitoring and Reporting Period
1. Five-Year Mitigation Establishment/Maintenance Period
 - a. The RMC shall be retained to complete maintenance monitoring activities throughout the five-year mitigation monitoring period.
 - b. Maintenance visits will be conducted twice per month for the first six months, once per month for the remainder of the first year, and quarterly thereafter.
 - c. Maintenance activities will include all items described in the LCD.
 - d. Plant replacement will be conducted as recommended by the PQB (note: plants shall be increased in container size relative to the time of initial installation or establishment or maintenance period may be extended to the satisfaction of MMC).
 2. Five-Year Biological Monitoring
 - a. All biological monitoring and reporting shall be conducted by a PQB or QBM, as appropriate, consistent with the LCD.
 - b. Monitoring shall involve both qualitative horticultural monitoring and quantitative monitoring (i.e., performance/success criteria). Horticultural monitoring shall focus on soil conditions (e.g., moisture and fertility), container plant health, seed germination rates, presence of native and non-native (e.g., invasive exotic) species, any significant disease or pest problems, irrigation repair and scheduling, trash removal, illegal trespass, and any erosion problems.

- c. After plant installation is complete, qualitative monitoring surveys will occur monthly during year one and quarterly during years two through five.
 - d. Upon the completion of the 120-days short-term plant establishment period, quantitative monitoring surveys shall be conducted at 0, 6, 12, 24, 36, 48 and 60 months by the PQB or QBM. The revegetation/restoration effort shall be quantitatively evaluated once per year (in spring) during years three through five, to determine compliance with the performance standards identified on the LCD. All plant material must have survived without supplemental irrigation for the last two years.
 - e. Quantitative monitoring shall include the use of fixed transects and photo points to determine the vegetative cover within the revegetated habitat. Collection of fixed transect data within the revegetation/restoration site shall result in the calculation of percent cover for each plant species present, percent cover of target vegetation, tree height and diameter at breast height (if applicable) and percent cover of non-native/non-invasive vegetation. Container plants will also be counted to determine percent survivorship. The data will be used determine attainment of performance/success criteria identified within the LCD.
 - f. Biological monitoring requirements may be reduced if, before the end of the fifth year, the revegetation meets the fifth-year criteria and the irrigation has been terminated for a period of the last two years.
 - g. The PQB or QBM shall oversee implementation of post-construction BMP, such as gravel bags, straw logs, silt fences or equivalent erosion control measure, as needed to ensure prevention of any significant sediment transport. In addition, the PBQ/QBM shall be responsible to verify the removal of all temporary post-construction BMP upon completion of construction activities. Removal of temporary post-construction BMP shall be verified in writing on the final post-construction phase CSV.
- B. Submittal of Draft Monitoring Report
- 1. A draft monitoring letter report shall be prepared to document the completion of the 120-day plant establishment period. The report shall include discussion on weed control, horticultural treatments (pruning, mulching, and disease control), erosion control, trash/debris removal, replacement planting/reseeding, site protection/signage, pest management, vandalism, and irrigation maintenance. The revegetation/restoration effort shall be visually assessed at the end of 120-day period to determine mortality of individuals.
 - 2. The PQB shall submit two copies of the Draft Monitoring Report which describes the results, analysis, and conclusions of all phases of the Biological Monitoring and Reporting Program (with appropriate graphics) to MMC for review and approval within 30 days following the completion of monitoring. Monitoring reports shall be prepared on an annual basis for a period of five years. Site progress reports shall be prepared by the PQB following each site visit and provided to the owner, RMC and RIC. Site progress reports shall review maintenance activities, qualitative and

- quantitative (when appropriate) monitoring results including progress of the revegetation relative to the performance/success criteria, and the need for any remedial measures.
3. Draft annual reports (three copies) summarizing the results of each progress report including quantitative monitoring results and photographs taken from permanent viewpoints shall be submitted to MMC for review and approval within 30 days following the completion of monitoring.
 4. MMC shall return the Draft Monitoring Report to the PQB for revision or, for preparation of each report.
 5. The PQB shall submit revised Monitoring Report to MMC (with a copy to RE) for approval within 30 days.
 6. MMC will provide written acceptance of the PQB and RE of the approved report.
- C. Final Monitoring Reports(s)
1. PQB shall prepare a Final Monitoring upon achievement of the fifth-year performance/success criteria and completion of the five-year maintenance period.
 - a. This report may occur before the end of the fifth year if the revegetation meets the fifth-year performance /success criteria and the irrigation has been terminated for a period of the last two years.
 - b. The Final Monitoring report shall be submitted to MMC for evaluation of the success of the mitigation effort and final acceptance. A request for a pre-final inspection shall be submitted at this time, MMC will schedule after review of report.
 - c. If at the end of the five years any of the revegetated area fails to meet the project's final success standards, the applicant must consult with MMC. This consultation shall take place to determine whether the revegetation effort is acceptable. The applicant understands that failure of any significant portion of the revegetation/restoration area may result in a requirement to replace or renegotiate that portion of the site and/or extend the monitoring and establishment/maintenance period until all success standards are met.

MM 5.4-4: Biological Resources – Least Bell's Vireo (State Endangered/Federally Protected)

1. Prior to issuance of any construction permits, including but not limited to, the first Grading Permit, Demolition Plans/Permits and Building Plans/Permits the City Manager (or appointed environmental designee) shall verify that the following project requirements regarding the least Bell's vireo are shown on the construction plans:

No clearing, grubbing, grading, or other construction activities shall occur between March 15 and September 15, the breeding season of the least Bell's vireo, until the following requirements have been met to the satisfaction of the City Manager:

- A. A qualified biologist (possessing a valid endangered species act section 10(a)(1)(a) recovery permit) shall survey those wetland areas that would be subject to construction

noise levels exceeding 60 decibels [dB(A)] or to the ambient noise level if it already exceeds 60 dB(A) hourly average for the presence of the least bell's vireo. Surveys for this species shall be conducted pursuant to the protocol survey guidelines established by the U.S. Fish and Wildlife Service within the breeding season prior to the commencement of construction. If the least Bell's vireo is present, then the following conditions must be met:

- I. Between March 15 and September 15, no clearing, grubbing, or grading of occupied least Bell's vireo habitat shall be permitted. Areas restricted from such activities shall be staked or fenced under the supervision of a qualified biologist; and
- II. Between March 15 and September 15, no construction activities shall occur within any portion of the site where construction activities would result in noise levels exceeding 60 dB(A) or to the ambient noise level if it already exceeds 60 dB(A) hourly average at the edge of occupied least bell's vireo or habitat. An analysis showing that noise generated by construction activities would not exceed 60 dB(A) hourly average at the edge of occupied habitat must be completed by a qualified acoustician (possessing current noise engineer license or registration with monitoring noise level experience with listed animal species) and approved by the city manager at least two weeks prior to the commencement of construction activities. Prior to the commencement of any of construction activities during the breeding season, areas restricted from such activities shall be staked or fenced under the supervision of a qualified biologist; or
- III. At least two weeks prior to the commencement of construction activities, under the direction of a qualified acoustician, noise attenuation measures (e.g., berms, walls) shall be implemented to ensure that noise levels resulting from construction activities will not exceed 60 dB(A) or to the ambient noise level if it already exceeds 60 dB(A) hourly average at the edge of habitat occupied by the least Bell's vireo. Concurrent with the commencement of construction activities and the construction of necessary noise attenuation facilities, noise monitoring* shall be conducted at the edge of the occupied habitat area to ensure that noise levels do not exceed 60 dB(A) hourly average or to the ambient noise level if it already exceeds 60 dB(A) hourly average. If the noise attenuation techniques implemented are determined to be inadequate by the qualified acoustician or biologist, then the associated construction activities shall cease until such time that adequate noise attenuation is achieved or until the end of the breeding season (September 16).

* Construction noise monitoring shall continue to be monitored at least twice weekly on varying days, or more frequently depending on the construction activity, to verify that noise levels at the edge of occupied habitat are maintained below 60 dB(A) hourly average or to the ambient noise level if it already exceeds 60 dB(A) hourly average. If not, other measures shall be implemented in consultation with the biologist and the City Manager, as necessary, to reduce noise levels to below 60 dB(A) hourly average or to the ambient noise level if it already exceeds 60 dB(A) hourly average. Such measures may include, but are not limited to, limitations on the placement of construction equipment and the

simultaneous use of equipment.

- B. If least Bell's vireo are not detected during the protocol survey, the qualified biologist shall submit substantial evidence to the City Manager and applicable resource agencies which demonstrates whether or not mitigation measures such as noise walls are necessary between March 15 and September 15 as follows:
 - I. If this evidence indicates the potential is high for least Bell's vireo to be present based on historical records or site conditions, then condition A.III shall be adhered to as specified above.
 - II. If this evidence concludes that no impacts to this species are anticipated, no mitigation measures would be necessary.

MM 5.4-5: Biological Resources – Southwestern Willow Flycatcher (Federally Endangered)

- 1. Prior to issuance of any construction permits, including but not limited to, the first Grading Permit, Demolition Plans/Permits and Building Plans/Permits the City Manager (or appointed environmental designee) shall verify that the following project requirements regarding the southwestern willow flycatcher are shown on the construction plans: No clearing, grubbing, grading, or other construction activities shall occur between May 1 and September 1, the breeding season of the southwestern willow Flycatcher, until the following requirements have been met to the satisfaction of the City Manager:
 - A. A qualified biologist (possessing a valid endangered species act section 10(a)(1)(a) recovery permit) shall survey those wetland areas that would be subject to construction noise levels exceeding 60 decibels [db(A)] hourly average or to the ambient noise level if it already exceeds 60 dB(A) hourly average for the presence of the southwestern willow flycatcher. Surveys for this species shall be conducted pursuant to the protocol survey guidelines established by the U.S. Fish and Wildlife Service within the breeding season prior to the commencement of any construction. If the southwestern willow flycatcher is present, then the following conditions must be met:
 - I. Between May 1 and September 1, no clearing, grubbing, or grading of occupied southwestern willow flycatcher habitat shall be permitted. Areas restricted from such activities shall be staked or fenced under the supervision of a qualified biologist; and
 - II. Between May 1 and September 1, no construction activities shall occur within any portion of the site where construction activities would result in noise levels exceeding 60 dB(A) hourly average at the edge of occupied southwestern Willow flycatcher habitat or to the ambient noise level if it already exceeds 60 dB(A) hourly average. An analysis showing that noise generated by construction activities would not exceed 60 dB(A) hourly average or to the ambient noise level if it already exceeds 60 dB(A) hourly average at the edge of occupied habitat must be completed by a qualified acoustician (possessing current noise engineer license or registration with

monitoring noise level experience with listed animal species) and approved by the City Manager at least two weeks prior to the commencement of construction activities. Prior to the commencement of construction activities during the breeding season, areas restricted from such activities shall be staked or fenced under the supervision of a qualified biologist; or

- III. At least two weeks prior to the commencement of construction activities, under the direction of a qualified acoustician, noise attenuation measures (e.g., berms, walls) shall be implemented to ensure that noise levels resulting from construction activities will not exceed 60 dB(A) hourly average or to the ambient noise level if it already exceeds 60 dB(A) hourly average at the edge of habitat occupied by the southwestern willow flycatcher. Concurrent with the commencement of construction activities and the construction of necessary noise attenuation facilities, noise monitoring* shall be conducted at the edge of the occupied habitat area to ensure that noise levels do not exceed 60 dB(A) hourly average or to the ambient noise level if it already exceeds 60 dB(A) hourly average. If the noise attenuation techniques implemented are determined to be inadequate by the qualified acoustician or biologist, then the associated construction activities shall cease until such time that adequate noise attenuation is achieved or until the end of the breeding season (September 1).

* Construction noise monitoring shall continue to be monitored at least twice weekly on varying days, or more frequently depending on the construction activity, to verify that noise levels at the edge of occupied habitat are maintained below 60 dB(A) hourly average or to the ambient noise level if it already exceeds 60 dB (A) hourly average. If not, other measures shall be implemented in consultation with the biologist and the City Manager, as necessary, to reduce noise levels to below 60 dB(A) hourly average or to the ambient noise level if it already exceeds 60 dB(A) hourly average. Such measures may include, but are not limited to, limitations on the placement of construction equipment and the simultaneous use of equipment.

- B. If southwestern willow flycatcher are not detected during the protocol survey, the qualified biologist shall submit substantial evidence to the City Manager and applicable resource agencies which demonstrates whether or not mitigation measures such as noise walls are necessary between May 1 and September 1 as follows:
 - I. If this evidence indicates the potential is high for southwestern willow flycatcher to be present based on historical records or site conditions, then condition A.III shall be adhered to as specified above.
 - II. If this evidence concludes that no impacts to this species are anticipated, no mitigation measures would be necessary.

Significance of Impacts

The Riverwalk project would not result in significant direct impacts to sensitive plant or animal species. No impacts to the MHPA would result. However, the project would result in significant direct

impacts to vegetation communities. The project would result in significant direct impacts to jurisdictional waters. The project would not interfere with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, including linkages identified in the MSCP Plan, or impede the use of native wildlife nursery sites. The project would result in an indirect impact to sensitive wildlife species.

Significance of Impacts Following Implementation of Mitigation Measures

Mitigation measure MM 5.4-1, MM 5.4-2, and MM 5.4-3 would fully mitigate project impacts to vegetation communities to below a level of significance. Mitigation measures MM 5.4-4 and MM 5.4-5 would fully mitigate indirect impacts to sensitive animal species.

5.4.4.2 Issue 5, Issue 6, and Issue 7

Issue 5 Would the project conflict with the provisions of an adopted Habitat Conservation Plan (HCP), Natural Conservation Community Plan (NCCP) 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 project introduce a land use within an area adjacent to the Multiple Habitat Planning Area (MHPA) that would result in adverse edge effects?

Issue 7 Would the proposal result in the introduction of invasive species of plants into natural open space areas?

Impact Thresholds

In accordance with the City's Significance Determination Thresholds and LDC Biology Guidelines (2018), the project would have a significant impact if it would:

- Result in *[a] conflict with the provisions of an adopted HCP, NCCP, or other approved local, regional, or state habitat conservation plan, either within the MSCP plan area or in the surrounding region;*
- Introduce *land use within an area adjacent to the MHPA that would result in adverse edge effects.*
- *Introduction of invasive species of plants into natural open space areas*

Analysis

According to the City's MSCP Subarea Plan, land uses planned or existing adjacent to the MHPA include single- and multiple-family residential, active recreation, commercial, industrial, agricultural, landfills, and extractive uses. The land uses adjacent to the MHPA are analyzed to ensure minimal impacts to the MHPA.

As described in Section 5.1, *Land Use*, the Riverwalk River Park would be developed in compliance with the San Diego River Park Master Plan where adjacent to the MHPA. Uses within the Riverwalk

River Park would include sports fields, picnic areas, dog parks, water features, a ranger station, a recreation center, restroom facilities, parking, and/or other amenities. The active park uses are located on the north and south ends of the park, between 50 and 550 feet from the San Diego River corridor and the MHPA. Uses nearer to the channel and partially within the MHPA would be passive in nature and would include walking/hiking trails and nature observation nodes with educational kiosks. Per the City's Subarea Plan, passive recreation is compatible with the biological objectives of the MSCP and is, therefore, allowed in the MHPA. The project would comply with all MHPA LUAGs; therefore, it would not result in adverse edge effects to the MHPA.

The 60 dBA noise contour resulting from construction activities for the project would occur approximately 500 feet from the river channel. See Figure 5.8-3, *60 dBA Construction Noise Contours*. The 60 dBA noise contour for any proposed use would occur at a minimum of approximately 150 feet and a maximum of approximately 520 feet and would include passive park, the 50-foot no-use buffer, and habitat restoration areas. Conditions would be implemented to ensure that indirect impacts associated with construction noise do not occur.

In addition, the project would comply with City landscape standards and MHPA LUAGs for invasive species. The landscape plans would not include any invasive plant species. Riverwalk River Park plantings would be comprised of native species. The MHPA area also would be restored to native conditions. As such, the project would not introduce invasive species of plants into natural open space.

The project would comply with MHPA Guideline B15 for the San Diego River and would otherwise avoid impacts to the MHPA. Additionally, the project would incorporate measures (such as Area-Specific Management Directives) for protection of MSCP Covered Species, as outlined in the City's Subarea Plan. Therefore, the project would not conflict with the MSCP.

The habitat restoration area created on-site, along the existing river channel and within the MHPA, would include 11.54 acres of wetland habitat enhancement, 13.32 acres of creation, and 0.30 acre of restoration of habitat temporarily impacted by the Fashion Valley Road improvements. The restoration is intended to create and enhance the native habitats along the San Diego River, within and adjacent to the MHPA, and is in excess of Guideline B15 in the City's MSCP Subarea Plan. The project would comply with all MHPA requirements. The surplus (acreage not needed for project mitigation) habitat area could serve as a future wetland habitat mitigation bank and would require additional effort to obtain mitigation banking approvals from wildlife agencies.

Conditions for Coverage

Appendix A of the City's MSCP Subarea Plan (City 1997) includes conditions of coverage for species covered by the plan, including Area Specific Management Directives (ADMDs). Four species covered by the Subarea Plan occur on-site: least Bell's vireo, light-footed Ridgway's rail, Cooper's hawk, and western bluebird. The southwestern willow flycatcher, which is also a covered species in the Subarea Plan, has moderate potential to occur on-site but was not found during focused

biology surveys conducted in 2015 and 2018. Conditions of coverage for these species are provided in Appendix A of the City's MSCP Subarea Plan. The project's conformance with conditions of coverage for these species is outlined below.

Least Bell's Vireo and Southwestern Willow Flycatcher

According to the conditions of coverage for least Bell's vireo and southwestern willow flycatcher, jurisdictions require surveys (using appropriate protocols) during the CEQA review process in suitable habitat proposed to be impacted and require incorporation of mitigation measures consistent with the Clean Water Act Section 404(b)1 guidelines to demonstrate compliance with the Clean Water Act. Participating jurisdictions' guidelines and ordinances, and State and Federal wetland regulations will provide additional habitat protection resulting in no net loss of wetlands. Jurisdictions must require new developments adjacent to preserve areas that create conditions attractive to brown-headed cowbirds to monitor and control cowbirds. Area specific management directives must include measures to provide appropriate successional habitat, upland buffers for known populations, cowbird control, and specific measures to protect against detrimental edge effects. Any clearing of occupied habitat must occur between September 16 and March 14 (i.e., outside of the nesting season).

The site was surveyed in 2015 and 2018 for presence of least Bell's vireo and southwestern willow flycatcher. The least Bell's vireo was found to be present, although the observations were of solitary, transient males. The southwestern willow flycatcher was not detected during surveys for the subspecies in 2015 and 2018 but is considered to have moderate potential to occur due to the presence of potentially suitable riparian breeding habitat. The least Bell's vireo was observed more than 350 feet outside the project site.

The project would restore, enhance, and protect all existing riparian habitat on-site in a manner that increases the quality of the habitat from existing conditions. The project would establish a 50-foot no use buffer adjacent to the MHPA and restored/enhanced/preserved wetland habitats. Uses nearer to the no use buffer and the MHPA would be passive in nature and would include walking/hiking trails and nature observation nodes with educational kiosks, which would provide additional buffer between the habitats and the active park uses. The wetland buffers and establishment of the Riverwalk River Park would allow for creation and enhancement of native upland transition habitat surrounding the wetlands. Only passive uses would be allowed in these areas. The buffers would include native plantings (following grading). Furthermore, the project would comply with the MHPA LUAGs to protect the wetlands in the MHPA from adverse indirect impacts.

The brown-headed cowbird (*Molothrus ater*), a nest parasite, has been observed on-site and would likely continue to occupy the site following implementation of the project. Because cowbird presence is part of the existing conditions on-site, the project would conduct cowbird monitoring and control during the maintenance and monitoring period of the wetland habitat restoration. Any further cowbird control would be the responsibility of the land management entity. Future land uses allowed in the Specific Plan area would not

include land uses attractive to cow birds (such as agricultural fields, and pastured cattle and horses). Construction activities shall be restricted during the nesting season (i.e., March 15–September 15).

Light-footed Ridgway's Rail

According to the conditions of coverage for the light-footed Ridgway's rail contained in Appendix A of the City's MSCP Subarea Plan, this species would be covered by the MSCP because 93 percent of its habitat would be conserved. Furthermore, participating jurisdictions' guidelines and ordinances, and state and federal wetland regulations will provide additional habitat protection resulting in no net loss of wetlands. ASMDs for the species must include active management of wetlands to ensure a healthy tidal saltmarsh environment, and specific measures to protect against detrimental edge effects to this species. Furthermore, the project has incorporated measure to avoid direct and indirect impacts to this species.

The Riverwalk River Park portion of the project includes grading and planting of native wetland species to create native habitats adjacent to the San Diego River and the existing wetlands in the southwestern portion of the project site. The goal is to create a mosaic of site-appropriate wetland/riparian associated habitats similar to those on-site through the installation of a broad species mix. The habitat restoration could create appropriate habitat for this species on-site. Additionally, the transitional upland/wetland habitat to be planted in the buffer between the river and proposed development to the north and the MHPA/wetland buffer to the south, as well as compliance with the MHPA LUAGs and avoidance of noise impacts, would provide protection against detrimental edge effects to this species. Post-construction noise levels would be less than 60 dBA at the edge of occupied habitat by adherence to specific distances determined in the Noise Study prepared for the project (Birdseye Planning, April 2020).

Cooper's Hawk

In the design of future projects within the Metro-Lakeside-Jamul segment, design of preserve areas shall conserve patches of oak woodland and oak riparian forest of adequate size for nesting and foraging habitat. Area specific management directives must include 300-foot impact avoidance areas around the active nests, and minimization of disturbance in oak woodlands and oak riparian forests.

The project is not located within the Metro-Lakeside-Jamul segment. Therefore, this Area Specific Management Directive is not applicable to the project.

Significance of Impacts

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, within the MSCP plan area or in the surrounding region. The project would also not introduce a land use within an area adjacent to the MHPA that would result in adverse edge effects nor introduce invasive species of plants into natural open space areas. Impacts would be less than significant.

Mitigation Measures

No mitigation measures would be required.

5.4.4.3 Issue 8

Issue 8 Would the project result in a conflict with any local policies or ordinances protecting biological resources?

Impact Threshold

In accordance with the City's Significance Determination Thresholds and LDC Biology Guidelines (2018), the project would have a significant impact if it would:

- Result in *[a] conflict with any local policies or ordinances protecting biological resources.*

Analysis

The City's ESL Regulations require avoidance of MHPA lands, wetlands, vernal pools in naturally occurring complexes, MSCP Covered Species, and MSCP Narrow Endemics. The project is subject to the City's ESL Regulations. To avoid a conflict with ESL Regulations, the project would require a deviation from ESL Regulations given that impacts to wetlands are expected to occur. The City's Biology Guidelines outline the deviation request process. As detailed above the project meets the requirements for a deviation under the Essential Public Project. Further, the project would mitigate wetlands to offset project impacts in accordance with Biology Guidelines to ensure no-net-loss of wetlands is achieved see (MM 5.4-1 and MM 5.4-4.). Refer to Land Use, Section 5.1, for additional information on ESL Regulations.

Significance of Impacts

The project meets the criteria under the Essential Public Project for a deviation from wetlands regulations. Therefore, the project would not result in a conflict with any local policies or ordinances protecting biological resources. Impacts would be less than significant.

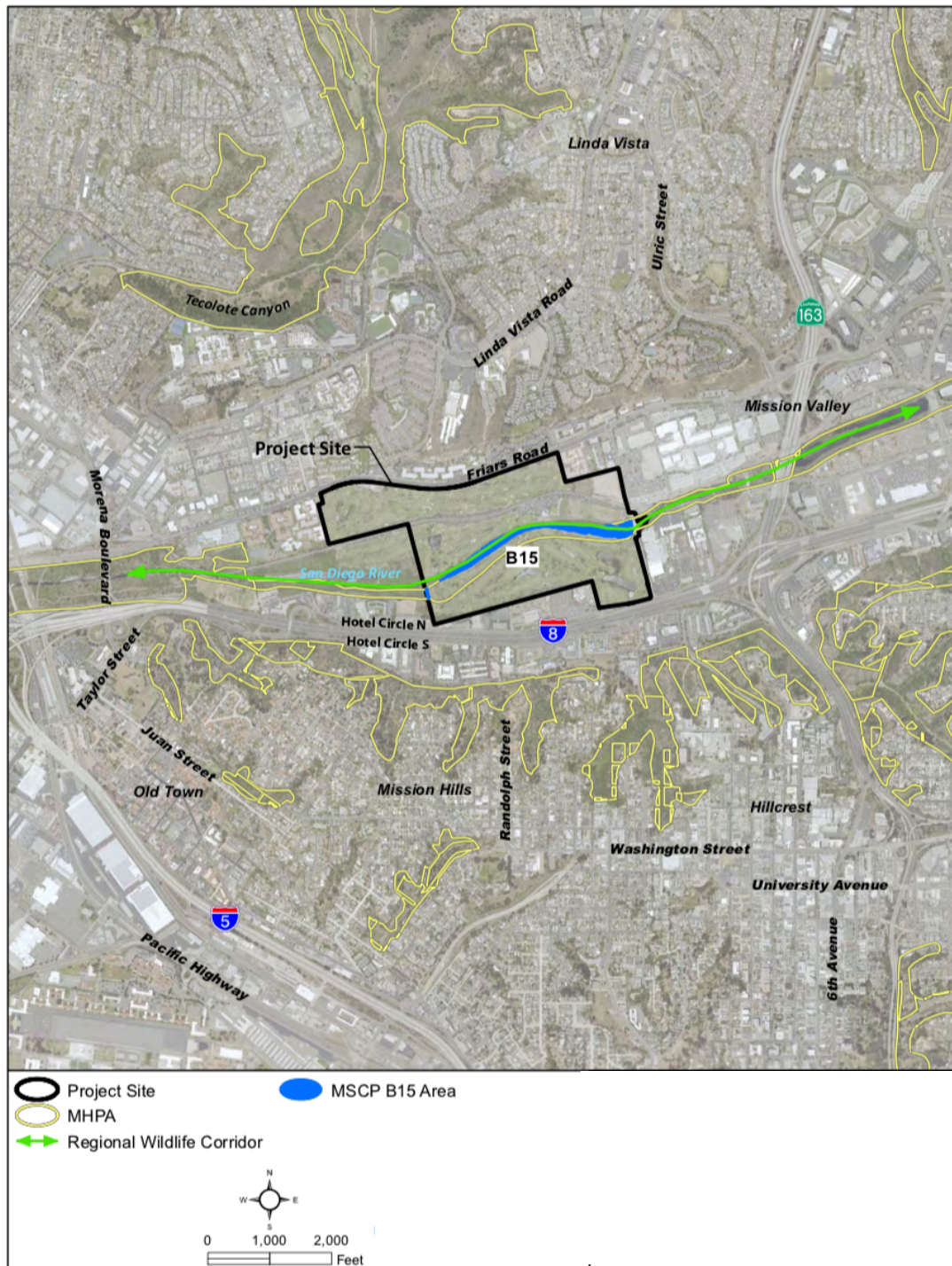


Figure 5.4-1. City of San Diego MHPA and Regional Corridor

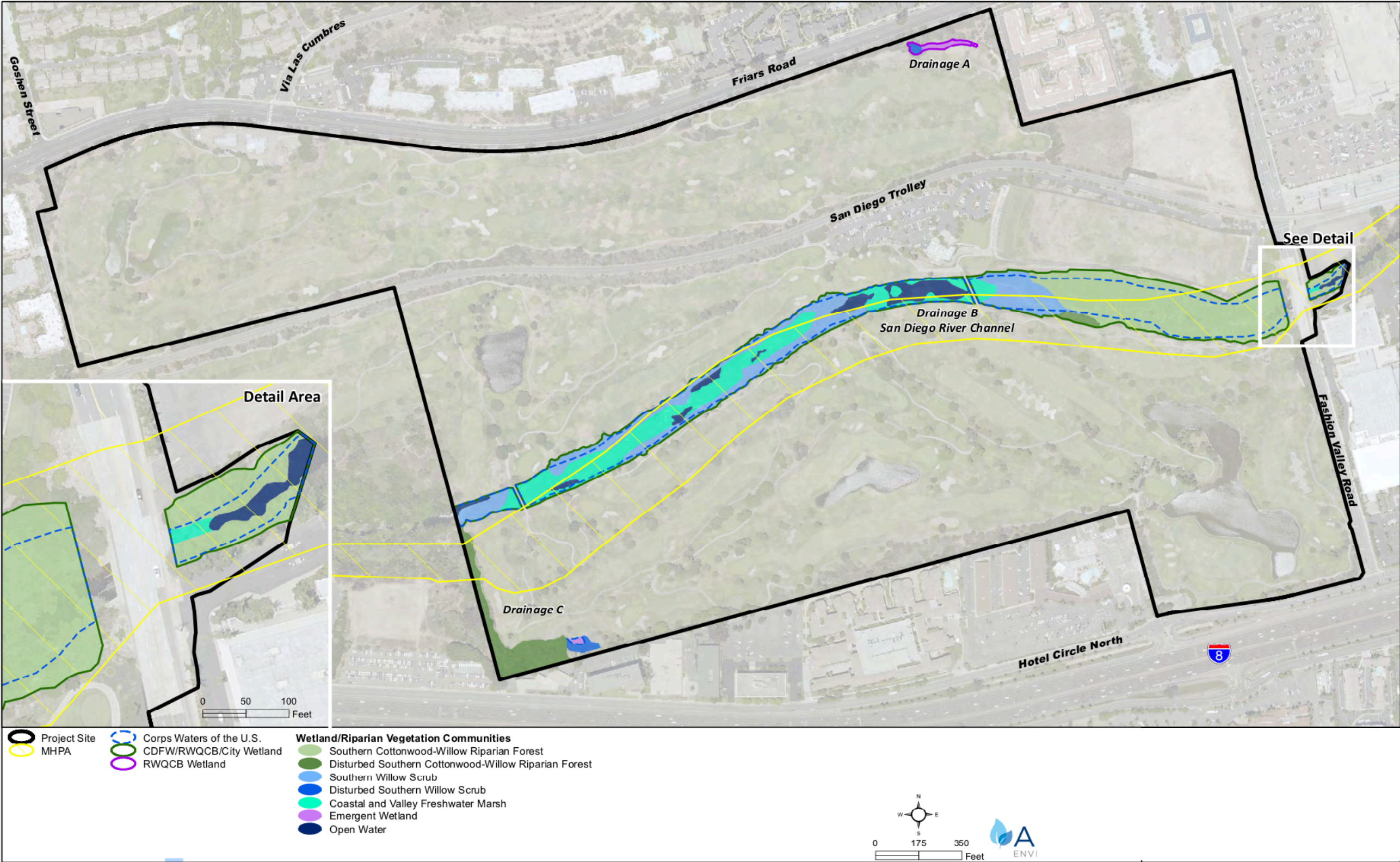


Figure 5.4-2. Riverwalk Jurisdictional Areas

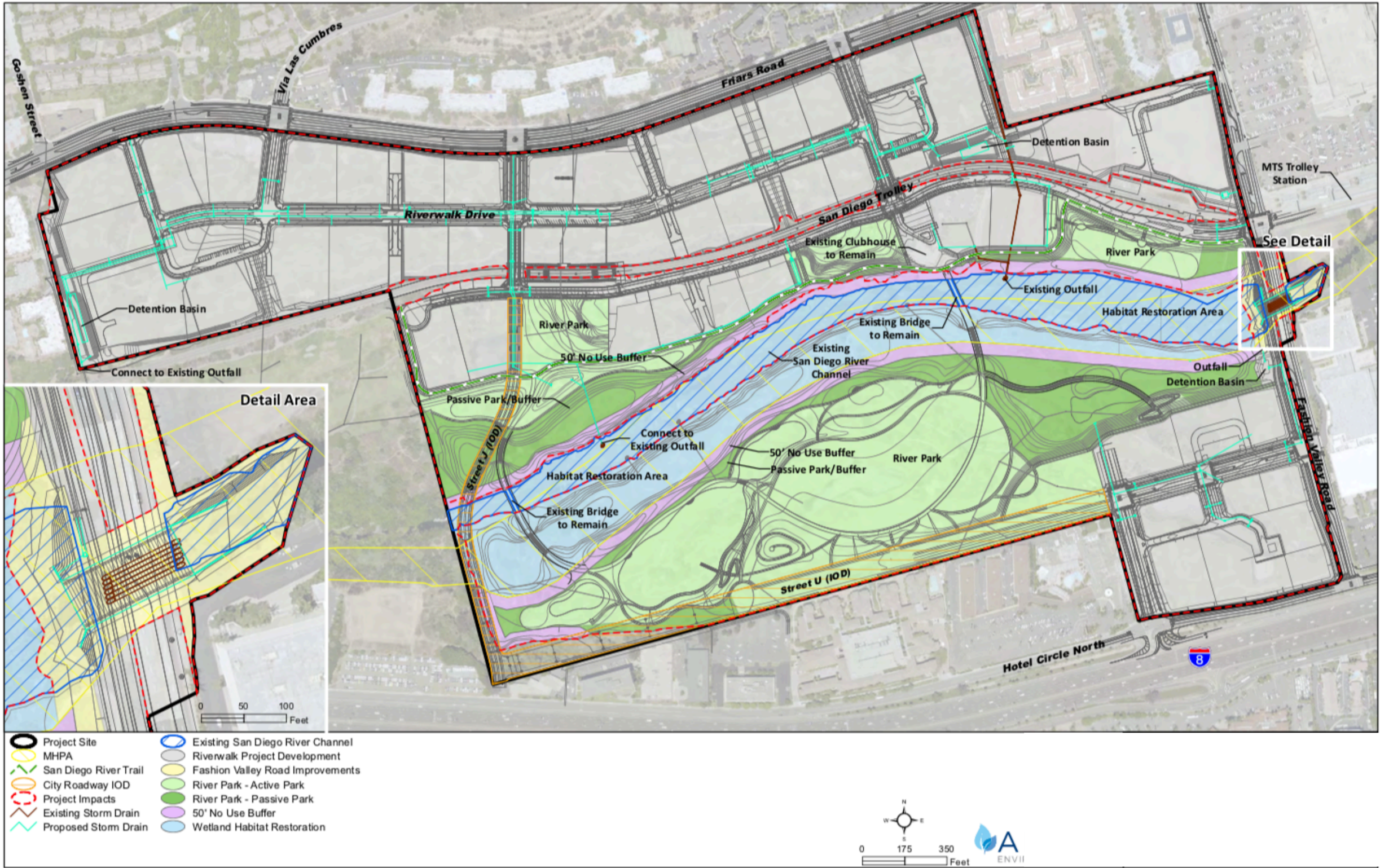


Figure 5.4-3. Development Plan/Impacts

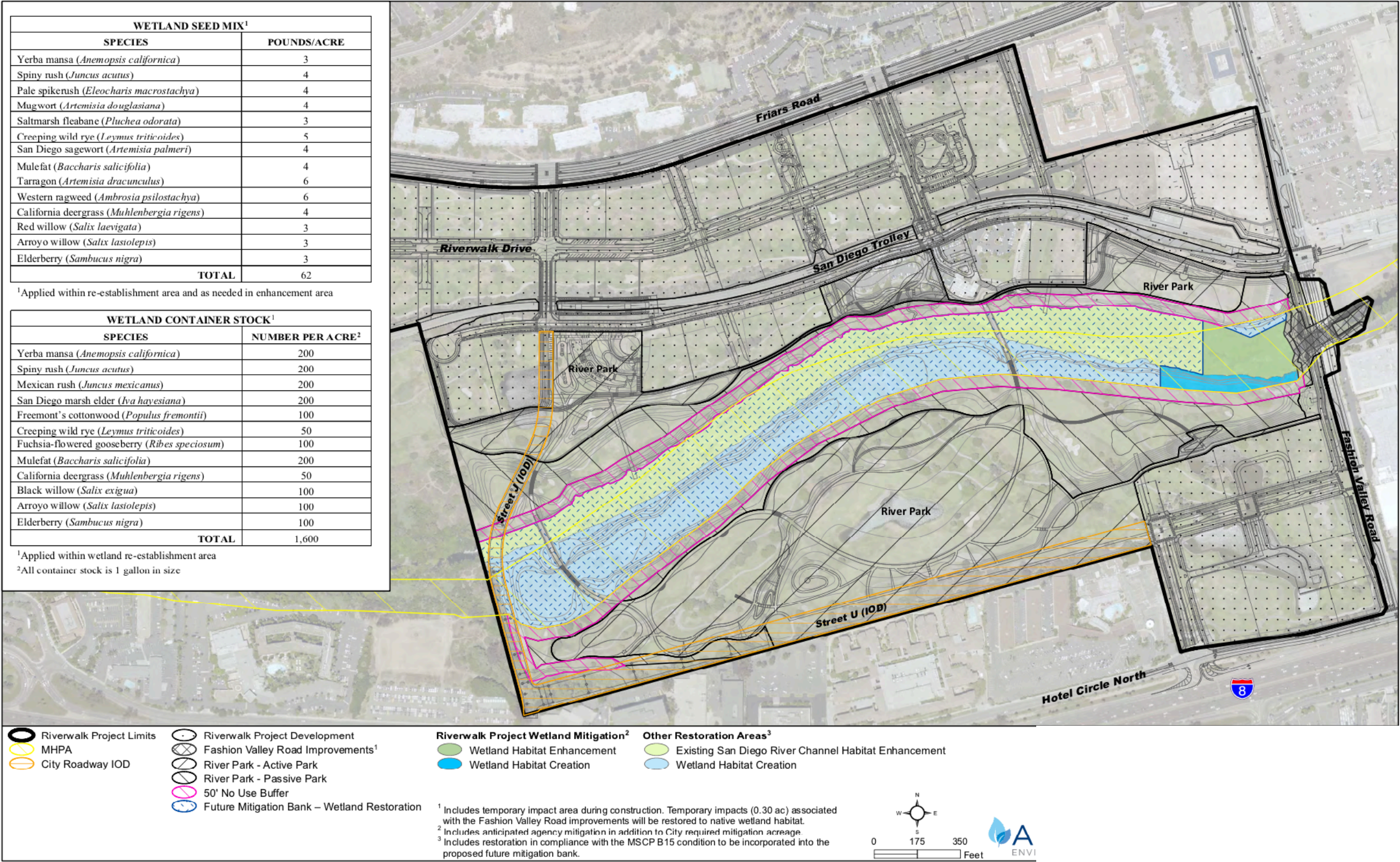


Figure 5.4-4. Habitat Restoration Area

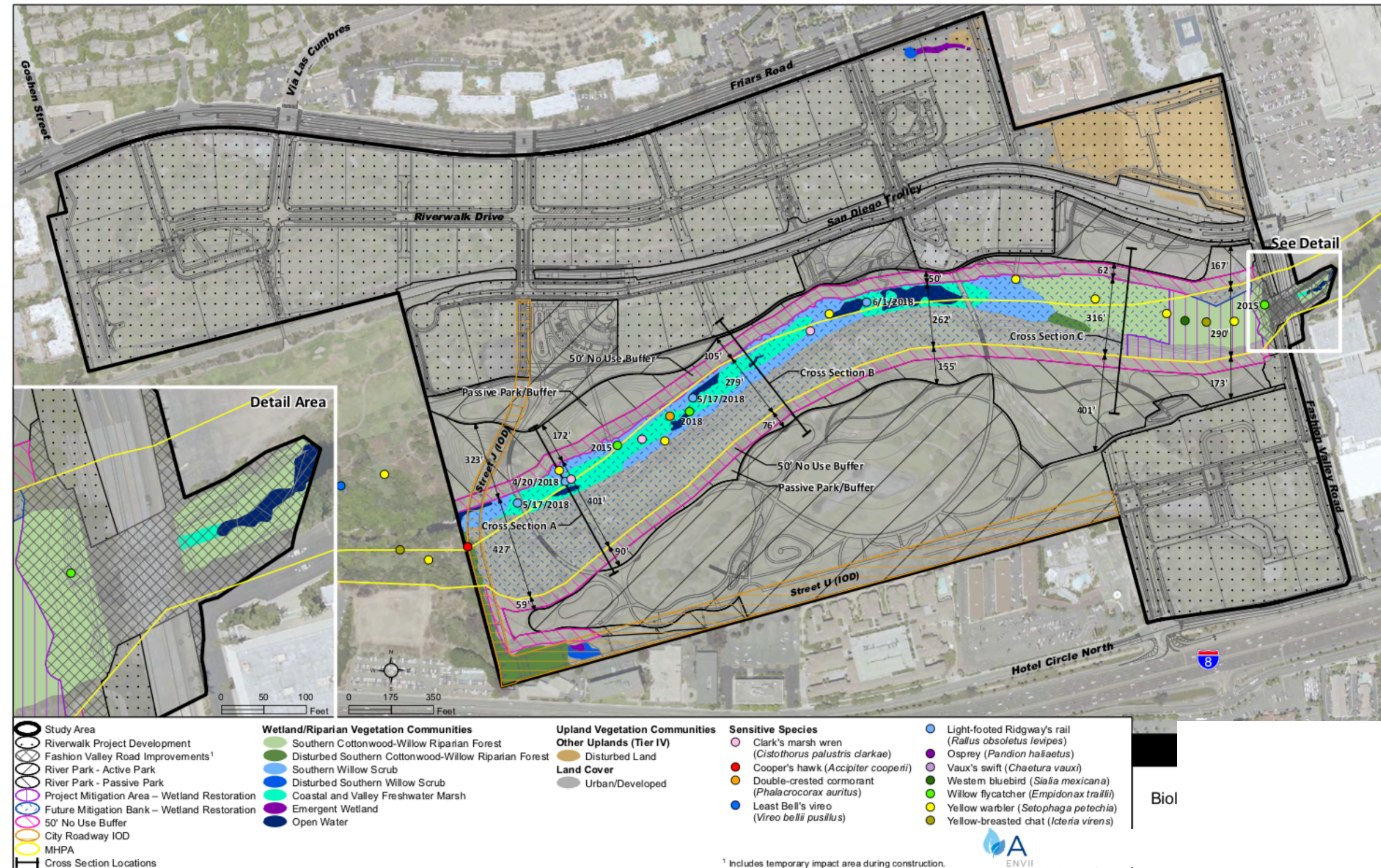


Figure 5.4-5. Impacts to Biological Resources

5.5 Air Quality

This section evaluates potential short-term (construction) and operational air quality and odor impacts associated with the project. The following discussion is based on the *Air Quality Study* prepared for the project by Birdseye Planning Group, dated April 2020 and included as Appendix F.

5.5.1 Existing Conditions

5.5.1.1 Regional Climate and Meteorology

The weather of San Diego County is profoundly influenced by the Pacific Ocean and its semi-permanent high-pressure systems that result in dry, warm summers and mild, occasionally wet winters. The average minimum temperature for January ranges from the mid-40s to the high-50s degrees Fahrenheit (four to 15 degrees Celsius) across the county. July maximum temperatures average in the mid-80s to the high-90s degrees Fahrenheit (high-20s to the high-30s degrees Celsius). Most of the county's precipitation falls from November to April, with infrequent (approximately 10 percent) precipitation during the summer. The average seasonal precipitation along the coast is approximately 10 inches (254 millimeters); the amount increases with elevations as moist air is lifted over the mountains.

The weather of San Diego County, including the San Diego Air Basin (SDAB), is dominated by a semi-permanent high-pressure cell located over the Pacific Ocean. The interaction of ocean, land, and the Pacific High-Pressure Zone maintains clear skies for much of the year and drives the prevailing winds. Local terrain is often the dominant factor inland and winds in inland mountainous areas tend to blow upwards in the valleys during the day and down the hills and valleys at night.

In conjunction with the onshore/offshore wind patterns, there are two types of temperature inversions (reversals of the normal decrease of temperature with height) that occur within the region that affect atmospheric dispersive capability and that act to degrade local air quality. In the summer, an inversion at about 1,100 to 2,500 feet (335 to 765 meters) is formed over the entire coastal plain when the warm air mass over land is undercut by a shallow layer of cool marine air flowing onshore. The prevailing sunny days in the region further exacerbate the smog problem by inducing additional adverse photochemical reactions. During the winter, a nightly shallow inversion layer (usually at about 800 feet or 243 meters) forms between the cooled air at the ground and the warmer air above, which can trap vehicular pollutants. The days of highest carbon monoxide (CO) concentrations occur during the winter months.

The predominant onshore/offshore wind pattern is sometimes interrupted by so-called Santa Ana conditions, when high pressure over the Nevada-Utah region overcomes the prevailing westerly wind direction. This draws strong, steady, hot, and dry winds from the east over the mountains and out to sea. Strong Santa Ana winds tend to blow pollutants out over the ocean, producing clear days.

However, at the onset or breakdown of these conditions or if the Santa Ana is weak, prevailing northwesterly winds are reestablished which send polluted air from the Los Angeles basin ashore in the SDAB. Smog transport from the South Coast Air Basin (the metropolitan areas of Los Angeles, Orange, San Bernardino, and Riverside counties) is a key factor on more than half the days San Diego exceeds clean air standards.

Pollutants of Concern

Criteria pollutants are defined by State and Federal law as a risk to the health and welfare of the general public. In general, air pollutants include ozone, reactive organic gases (ROG), CO, particulate matter (PM₁₀), fine particulate matter (PM_{2.5}), nitrogen dioxide (NO₂) sulfur dioxide (SO₂), and lead. These compounds are described below.

Ozone

Ozone is produced by a photochemical reaction (triggered by sunlight) between NO_x and ROG. Nitrogen oxides are formed during the combustion of fuels, while reactive organic compounds are formed during combustion and evaporation of organic solvents. Because ozone requires sunlight to form, it mostly occurs in concentrations considered serious between the months of April and October. 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.

Reactive Organic Gases

ROGs (also known as VOCs) are compounds composed primarily of hydrogen and carbon atoms. Internal combustion associated with motor vehicle usage is the major source of ROGs. Other sources of ROGs include evaporative emissions from paints and solvents, the application of asphalt paving, and the use of household consumer products such as aerosols. Adverse effects on human health are not caused directly by ROGs, but rather by reactions of ROGs to form secondary pollutants such as ozone.

Carbon Monoxide

CO is a local pollutant that is found in high concentrations only near the source. The major source of carbon monoxide, a colorless, odorless, poisonous gas, is automobile exhaust. Elevated CO concentrations; therefore, are usually only found near areas of high traffic volumes operating in congested conditions. Health effects from CO are related to blood hemoglobin. At high concentrations, carbon monoxide reduces the amount of oxygen in the blood, causing heart difficulties in people with chronic diseases, reduced lung capacity and impaired mental abilities.

Particulate Matter and Fine Particulate Matter

PM₁₀ 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 PM₁₀ 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, or PM₁₀) 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.

Nitrogen Dioxide

NO₂ is a by-product of fuel combustion, with the primary source being motor vehicles and industrial boilers and furnaces. The principal form of nitrogen oxide produced by combustion is nitric oxide (NO), but NO reacts rapidly to form NO₂, creating the mixture of NO and NO₂ commonly called NO_x. Nitrogen dioxide is an acute irritant. A relationship between NO₂ and chronic pulmonary fibrosis may exist and an increase in bronchitis in young children at concentrations below 0.3 parts per million (ppm) may occur. Nitrogen dioxide absorbs blue light and causes a reddish-brown cast to the atmosphere and reduced visibility. It can also contribute to the formation of PM₁₀ and acid rain.

Sulfur Dioxide

SO₂ is a colorless, reactive gas that is produced from the burning of sulfur-containing fuels such as coal and oil and by other industrial processes. Generally, the highest concentrations of SO₂ are found near large industrial sources. SO₂ is a respiratory irritant that can cause narrowing of the airways leading to wheezing and shortness of breath. Long-term exposure to SO₂ can cause respiratory illness and aggravate existing cardiovascular disease.

Lead

Lead in the atmosphere occurs as particulate matter. With the phase-out of leaded gasoline, large manufacturing facilities are the sources of the largest amounts of lead emissions. Lead has the potential to cause gastrointestinal, central nervous system, kidney, and blood diseases upon prolonged exposure. Lead is also classified as a probable human carcinogen. Because emissions of lead are found only in projects that are permitted by the local air district and are generally large manufacturing facilities, lead is not an air quality concern for the project.

Toxic Air Contaminants/Diesel Particulate Matter

Hazardous air pollutants, also known as toxic air pollutants (TACs) or air toxics, are those pollutants that are known or suspected to cause cancer or other serious health effects, such as reproductive effects or birth defects, or adverse environmental effects. Examples of toxic air pollutants include:

- benzene, which is found in gasoline;
- perchloroethylene, which is emitted from some dry-cleaning facilities; and
- methylene chloride, which is used as a solvent.

Transportation-related emissions are focused on particulate matter constituents within diesel exhaust and TAC constituents that comprise a portion of total organic gas (TOG) emissions from both diesel and gasoline fueled vehicles. Diesel engine emissions are comprised of exhaust particulate matter and TOGs, which are collectively defined as Diesel Particulate Matter (DPM). DPM and TOG emissions from both diesel and gasoline fueled vehicles are typically composed of carbon particles and carcinogenic substances including polycyclic aromatic hydrocarbons, benzene, formaldehyde, acetaldehyde, acrolein, and 1,3-butadiene. Diesel exhaust also contains gaseous pollutants, including volatile organic compounds and NO_x.

5.5.1.2 San Diego Air Basin Attainment Status

The San Diego Air Pollution Control District (SDAPCD) is required to monitor air pollutant levels to ensure that air quality standards are met and, if they are not met, to develop strategies to meet the standards. Depending on whether the standards are met or exceeded, the local air basin is classified as being in “attainment” or “non-attainment.” San Diego County is listed as a Federal non-attainment area for ozone (eight hour) and a State non-attainment area for ozone (one hour and eight-hour standards), PM₁₀, and PM_{2.5}. As shown in Table 5.5-1, *San Diego County Attainment Status*, the SDAB is in attainment for the State and Federal standards for NO₂, CO, SO₂, and lead.

5.5.1.3 Monitored Air Quality

The SDAPCD monitors air quality conditions at locations throughout the SDAB. For this analysis, data from the San Diego Kearny Villa Road monitoring station located east of the site were used to characterize existing ozone and PM_{2.5} conditions in the vicinity of the project site. A summary of the data recorded at the Kearny Villa Road monitoring station from 2015 through 2017 is presented in Table 5.5-2, *Ambient Air Quality Data*.

Table 5.5-1. San Diego County Attainment Status

Criteria Pollutant	Federal Designation	State Designation
Ozone (one hour)	Attainment*	Non- Attainment
Ozone (eight hour)	Non- Attainment	Non- Attainment
Carbon Monoxide	Attainment	Attainment
PM ₁₀	Unclassifiable**	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

*The Federal 1-hour standard of 12 ppm was in effect from 1979 through June 1, 2005. The revoked standard is referenced here because it was used for such a long period and because this benchmark is addressed in 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: San Diego Air Pollution Control District, June 2016.

Table 5.5-2. Ambient Air Quality Data

Pollutant	2015	2016	2017
Ozone, ppm – Worst 8-Hour Average	0.070	0.075	0.082
Number of days of State 1-hour exceedances (>0.070 ppm)	0	3	6
Number of days of Federal exceedances (>0.070 ppm) ¹	0	3	6
Particulate Matter < 10 microns, µg/m ³ Worst 24 Hours*	39	39	46
Number of samples of State exceedances (>50 µg/m ³)	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	25.7	19.4	27.5
Number of samples of State exceedances (no standard)	N/A	N/A	N/A
Number of samples of Federal exceedances (>150 µg/m ³)	0	0	0

¹Federal O3 standard reduced from 75 ppm to 70 ppm in October 2015

*Insufficient data to determine number of exceedances

Data from the San Diego Kearny Villa Road, 6125 A Kearny Villa Road Station in San Diego.

Source: California Air Resources Board, 2014, 2015, 2016 Air Quality Data Summaries.

Odors

The California Health and Safety Code (CHSC) Sections 41700 and 41705 and SDAPCD Rule 51 (commonly referred to as public nuisance law) prohibit emissions from any source whatsoever in such quantities of air contaminants or other material, which cause injury, detriment, nuisance, or annoyance to the public health or damage to property. The provisions of these regulations do not apply to odors emanating from agricultural operations necessary for the growing of crops or the raising of fowl or animals. It is generally accepted that the considerable number of persons requirement in Rule 51 is normally satisfied when 10 different individuals/households have made separate complaints within 90 days. Odor complaints from a “considerable” number of persons or businesses in the area would be considered to constitute a significant, adverse odor impact.

The SDMC also addresses odor impacts in Chapter 14, Article 2, Division 7 Section 142.0710, "Air Contaminant Regulations," 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.

Sensitive Receptors

Land uses considered to be sensitive receptors include residential, schools, childcare centers, acute care hospitals, and long-term health care facilities. Sensitive receptors are determined based upon special factors which may include the age of the users or occupants, the frequency and duration of the use or occupancy, continued exposure to hazardous substances as defined by federal and state regulations, and the user's ability to evacuate a specific site in the event of a hazardous incident. 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.

Recreational uses can be considered moderately sensitive to air pollution. Exercise can place a high demand on respiratory functions, which can be impaired by air pollution even though exposure periods during exercise are generally short. In addition, noticeable air pollution can detract from the enjoyment of recreation. Industrial and commercial areas are considered the least sensitive to air pollution. Exposure periods are relatively short and intermittent, as the majority of workers tend to stay indoors most of the time.

The nearest sensitive receptors are multi-family residences located adjacent to the northeast and northwest corners of the project site. Multi-family residences are located adjacent to the northern site boundary on the north side of Friars Road. Additionally, multi-family residences are located along the southern site boundary on the north side of Hotel Circle North. New residential development will occur at the Town and Country Hotel and Union Tribute properties, both located east of the project site. The project would contain sensitive receptors as residential uses are developed within Riverwalk.

5.5.2 Regulatory Framework

Air pollutants are regulated at the national, State, and air basin level; each agency has a different degree of control. The United States Environmental Protection Agency (EPA) regulates at the national level; the CARB regulates at the State level; and the SDAPCD regulates air quality in San Diego County.

5.5.2.1 Federal

Clean Air Act

Air quality is defined by ambient air concentrations of specific pollutants identified by the EPA to be of concern with respect to health and welfare of the general public. The USEPA is responsible for enforcing the Federal CAA of 1970 and its 1977 and 1990 Amendments. The CAA required the USEPA to establish the National Ambient Air Quality Standards (NAAQS), which identify concentrations of pollutants in the ambient air below which no adverse effects on the public health and welfare are anticipated. Both State and Federal standards are summarized in Table 5.5-3, *Current Federal and State Ambient Air Quality Standards*. The Federal "primary" standards have been established to protect the public health. The Federal "secondary" standards are intended to protect the nation's welfare and account for air pollutant effects on soil, water, visibility, materials, vegetation, and other aspects of the general welfare.

5.5.2.2 State

California Air Resources Board

CARB, which became part of the California EPA (CalEPA) in 1991, is responsible for ensuring implementation of the California Clean Air Act (CCAA), meeting State requirements of the Federal Clean Air Act and establishing California Ambient Air Quality Standards (CAAQSs). It is also responsible for setting emission standards for vehicles sold in California and for other emission sources such as consumer products and certain off-road equipment. CARB also established passenger vehicle fuel specifications and oversees the functions of local air pollution control districts and air quality management districts, which in turn administer air quality activities at the regional and county level. The CCAA is administered by CARB at the State level and by the Air Quality Management Districts at the regional level. State standards are also included in Table 5.5-3.

State Implementation Plan/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. SIPs are comprehensive plans that describe how an area will attain national and State ambient air quality standards. SIPs are a compilation of new and previously submitted plans, programs (i.e., monitoring, modeling and permitting programs), district rules, State regulations, and Federal controls and include pollution control measures that demonstrate how the standards will be met through those measures.

State law makes CARB the lead agency for all purposes related to the SIP. Local air districts and other agencies prepare SIP elements and submit them to CARB for review and approval. CARB forwards SIP revisions to the EPA for approval and publication in the Federal Register. Thus, the RAQS and Air Quality Management Plan (AQMP) prepared by SDAPCD and referenced herein become part of the SIP as the material relates to efforts ongoing in San Diego to achieve the national

and State ambient air quality standards. The most recent SIP element for San Diego County was submitted in December 2016. The document identifies control measures and associated emission reductions necessary to demonstrate attainment of the 2008 Federal eight-hour ozone standard by July 20, 2018.

Table 5.5-3. Current Federal and State Ambient Air Quality Standards

Pollutant	Average Time	Federal Primary Standards	California Standard
Ozone	1-hour	--	0.09 ppm
	8-hour	0.070 $\mu\text{g}/\text{m}^3$	0.070 $\mu\text{g}/\text{m}^3$
PM ₁₀	24-Hour	150 $\mu\text{g}/\text{m}^3$	50 $\mu\text{g}/\text{m}^3$
	Annual	--	20 $\mu\text{g}/\text{m}^3$
PM _{2.5}	24-Hour	35 $\mu\text{g}/\text{m}^3$	--
	Annual	12 $\mu\text{g}/\text{m}^3$	12 $\mu\text{g}/\text{m}^3$
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
	3-Hour	0.5 ppm (secondary)	--
	1-Hour	0.075 ppm (primary)	0.25 ppm
Lead	30-day Average	--	1.5 $\mu\text{g}/\text{m}^3$
	3-Month Average	0.15 $\mu\text{g}/\text{m}^3$	--

ppm = parts per million

$\mu\text{g}/\text{m}^3$ = micrograms per cubic meter

Source: California Air Resources Board

The San Diego RAQS was developed pursuant to CCAA requirements. The RAQS was initially adopted in 1991 and was updated in 1995, 1998, 2001, 2004, 2009, and 2016. 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 VOC and 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. At present, no attainment plan for PM₁₀ 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 estimate future emissions and then determine strategies necessary for the reduction of emissions through regulatory controls. CARB mobile source emission projections and SANDAG growth projections are based on population and vehicle trends as well as 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 which 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 conflict with the RAQS and SIP; and thus, have a potentially significant impact on air quality.

Under State law, the SDAPCD is required to prepare an AQMP for pollutants for which the SDAB is designated non-attainment. Each iteration of the SDAPCD's AQMP is an update of the previous plan and has a 20-year horizon. Currently the SDAPCD has implemented a 2012 eight-hour National Ozone Implementation/Maintenance Plan, a 2007 eight-hour Ozone Plan, and a 2004 Carbon Monoxide Plan. The SDAPCD adopted the 2008 eight-hour Ozone Attainment Plan for San Diego County on December 16, 2016. CARB adopted the ozone plan as a revision to the California SIP on March 23, 2017. The ozone plan was submitted to the EPA for review on April 12, 2017.

5.5.2.3 Local

San Diego Air Pollution Control District

The SDAPCD was created to protect the public from the harmful effects of air pollution, achieve and maintain air quality standards, foster community involvement and develop and implement cost-effective programs that meet State and Federal mandates while considering environmental and economic impacts.

Specifically, the SDAPCD is responsible for monitoring air quality and planning, implementing, and enforcing programs designed to attain and maintain State and Federal ambient air quality standards in the district. Programs developed include air quality rules and regulations that regulate stationary source emissions, including area sources, point sources, and certain mobile source emissions. The SDAPCD is also responsible for establishing permitting requirements for stationary sources and ensuring that new, modified or relocated stationary sources do not create net emissions increases; and thus, are consistent with the region's air quality goals. The SDAPCD provides significance thresholds in Regulation II, Rule 20.2, Table 20-2-1, "*Air Quality Impact Assessment (AQIA) Trigger Levels*." These trigger levels were established for stationary sources of air pollution and are commonly used for environmental evaluations. The SDAPCD enforces air quality rules and regulations through a variety of means, including inspections, educational or training programs, or fines, when necessary.

5.5.3 Impact Analysis

5.5.3.1 Issue 1

Issue 1 Would the project conflict with or obstruct implementation of the applicable air quality plan?

Impact Threshold

The SDAPCD is required, pursuant to the Federal CAA, to reduce emissions of criteria pollutants for which the SDAB is in nonattainment. Strategies to achieve these emissions reductions are developed in the RAQS and SIP, prepared by the APCD for the region.

The CARB mobile source emission projections and SANDAG growth projections that are used to develop the RAQS and SIP are based on population and vehicle trends and land use plans developed by the cities and by the County. As such, projects that propose development that is consistent with or propose less density than the growth anticipated by local community or general plans would be consistent with the RAQS. If a project proposes development that is greater than that anticipated in the local plan and SANDAG's growth projections upon which the RAQS is based, the project would be in conflict with the RAQS and SIP and may have a potentially significant impact on air quality. This situation would warrant further analysis to determine if the project and the surrounding projects exceed the growth projections used in the RAQS for the specific subregional area.

Analysis

Conformance with the RAQS and SIP determines whether a project will conflict with or obstruct implementation of the applicable air quality plans. The RAQS relies on information from CARB and SANDAG, including projected growth in the County, mobile, area, and all other source emissions to project future emissions and determine from that the strategies necessary for the reduction of stationary source emissions through regulatory controls. Projects that propose development that is consistent with the growth anticipated by the General Plan is consistent with the SIP, AQMP, and RAQS.

The Riverwalk Specific Plan area is zoned CC-3-9 (Commercial—Community) in the central, northeastern, and southeastern portions of the site; RM-4-10 (Residential—Multiple Unit) in the northwestern and northeastern portions of the site; OP-1-1 (Open Space—Park) in the central portion of the site, and OC-1-1 (Open Space – Conservation) in the central portion of the site. The project would rezone portions of the Specific Plan area to implement the proposed land uses, as shown on Figure 3-12, *Proposed Zoning*. No new base zones would be introduced. As proposed, development areas within Riverwalk would be zoned CC-3-9 and RM-4-10. Park and open space elements along and around the San Diego River would be zoned OC-1-1 (for the river channel within the MHPA and 50-foot no use buffer) and OP-1-1 (for the park elements). Additionally, the proposed CPA would remove the CPIOZ mentioned above from the project site. The Mission Valley Community Plan designates the project site as Riverwalk Specific Plan, with land uses of Residential (high-density) in the northeastern and northwestern portions of the site, Office and Visitor Commercial in the northcentral, northeastern, and southeastern portions of the site, and Potential Park/Open Space in the central portion of the site. The project site is designated Multiple Use; Commercial Employment, Retail, and Services; and Parks, Open Space, and Recreation in the General Plan. The project is consistent with both the Mission Valley Community Plan and General Plan.

Projects that propose development that is consistent with the growth anticipated by the General Plan are consistent with the SIP, AQMP, and RAQS. While the project would, at full buildout, result in cumulatively significant air quality impacts associated with ROG, CO and PM₁₀ emissions generated by Phases I, II, and III, the emissions would be less than what has been approved for the site and would be consistent with what has been approved in the General Plan and the Mission Valley Community Plan. As such, the project would not cause or contribute to a conflict with the AQMP, RAQS or SIP and, therefore, would not obstruct implementation of these air quality plans.

Significance of Impacts

The project would be consistent with the SIP, AQMP, and RAQS. Therefore, the project would not conflict with or obstruct implementation of any applicable air quality plans. Impacts would be less than significant.

Mitigation Measures

Mitigation would not be required.

5.5.3.2 Issue 2 and Issue 3

Issue 2 Would the project result in a violation of any air quality standard or contribute substantially to an existing or projected air quality violation?

Issue 3 Would the project exceed 100 pounds per day of Particulate Matter (dust)?

Impact Threshold

As stated in Appendix G of the CEQA Guidelines, *significance established by the applicable air quality management or air pollution control district may be relied upon*. The City's air quality Significance Determination Thresholds are established by the SDAPCD. The SDAPCD sets forth quantitative emission thresholds for stationary sources. Project-related air quality impacts would be considered significant if any of the applicable significance thresholds presented herein are exceeded. For CEQA purposes, these screening criteria can be used as numeric methods to demonstrate that a project's total emissions would not result in a significant impact to air quality. Significance thresholds are listed in Table 5.5-4, *San Diego Air Pollution Control District Pollutant Operational Thresholds*.

Table 5.5-4. San Diego Air Pollution Control District Pollutant Operational Thresholds

Pollutant	Emission Rate (Lbs/hour)	Emission Rate (Lbs/Day)	Emission Rate (Lbs/Day)
Carbon Monoxide (CO)	100	550	100
Oxides of Nitrogen (NOx)	25	250	40
Particulate Matter (PM ₁₀)	--	100	15
Sulfur Oxides (SOx)	25	250	40
Lead and Lead Compounds	--	3.2	0.6
Particulate Matter (PM _{2.5})	--	55	--
Volatile Organic Compounds (VOCs)	--	137	15

Analysis

Construction Emissions

Construction activities would include demolition of existing asphalt concrete parking lots, vegetation removal, grading, construction of the buildings/utilities, related improvements, and paving driveways and parking areas. Construction activities would require the use of equipment that would generate criteria air pollutant emissions. The project would be graded in a phased manner restricted by City rules, regulations and ordinances; agency limitations; and testing for archaeological/cultural resources; as well as the RWQCB. For purposes of the analysis of air quality impacts, three general construction phases have been assumed, with Phase I (western portion of North District) completed in 2025, Phase II (eastern portion of North District and Central District) completed in 2030 and Phase III (South District) completed in 2035.

Project construction would generate temporary air pollutant emissions. These impacts are associated with fugitive dust (PM₁₀ and PM_{2.5}) from soil disturbance and exhaust emissions (NO_x and CO) from heavy construction vehicles. For the purpose of estimating emissions, it was assumed that the approximately 10 acres would be disturbed (graded) daily during the construction of each general grading phase. This would vary from day-to-day depending on construction requirements; however, based on the size of the construction area, a 10-acre area reasonably approximates the area where site preparation and grading emissions would be concentrated. The number of haul trips to remove demolition debris was estimated based on tonnage. Construction would generally consist of construction/demolition waste, vegetation removal, site preparation, construction of the buildings, paving and the application of architectural coating (painting interior surfaces only). Exterior surfaces were assumed to be glass, stone, brick, or other surfaces that would not require painting. For the purpose of estimating daily emissions, the various steps in the construction process were overlapped to approximate the completion timeline for the residential and commercial uses.

Site preparation and grading would involve the greatest concentration of heavy equipment use and the highest potential for fugitive dust emissions. The project would be required to comply with SDAPCD Rules 52 and 54, which identify measures to reduce fugitive dust, and is required to be implemented at all construction sites located within the SDAB. Therefore, the following conditions, which are required to reduce fugitive dust in compliance with SDAPCD Rules 52 and 54, were included in emissions modeling for site preparation and grading phases of construction:

1. **Minimization of Disturbance.** Construction contractors should minimize the area disturbed by clearing, grading, earth moving, or excavation operations to prevent excessive amounts of dust.
2. **Soil Treatment.** Construction contractors should treat all graded and excavated material, exposed soil areas and active portions of the construction site, including unpaved on-site roadways to minimize fugitive dust. Treatment shall include, but not necessarily be limited to, periodic watering, application of environmentally safe soil stabilization materials, and/or roll compaction as appropriate. Watering shall be done as often as necessary, and at least twice daily, preferably in the late morning and after work is done for the day.
3. **Soil Stabilization.** Construction contractors should monitor all graded and/or excavated inactive areas of the construction site at least weekly for dust stabilization. Soil stabilization methods, such as water and roll compaction, and environmentally safe dust control materials shall be applied to portions of the construction site that are inactive for over four days. If no further grading or excavation operations are planned for the area, the area shall be seeded and watered until landscape growth is evident, or periodically treated with environmentally safe dust suppressants, to prevent excessive fugitive dust.
4. **No Grading During High Winds.** Construction contractors should stop all clearing, grading, earth moving, and excavation operations during periods of high winds (20 miles per hour or greater, as measured continuously over a one-hour period).
5. **Street Sweeping.** Construction contractors should sweep all on-site driveways and adjacent streets and roads at least once per day, preferably at the end of the day, if visible soil material is carried over to adjacent streets and roads.

Project construction would involve three general phases. Phase I construction is assumed to begin in 2021 and be completed in 2025 with residual painting occurring in early 2026. Phase I would include roughly the western half of the North District and would involve the construction of 1,910 multi-family units; 110,300 square feet commercial retail space; 65,000 square feet office and non-retail commercial space; and 4.71 acres of developed park. Phase II construction would begin in 2026 and be completed by 2030. Phase II would include roughly the eastern half of the North District, the entire Central District, and the entire Park District. This phase would involve the construction of 2,390 multi-family units; 13,100 square feet commercial retail space; construction of the Riverwalk trolley station; and 79.75 acres of developed park (including the River Park). Phase III construction would begin in 2031 and be completed by 2035. Phase III would include the South District and would involve the construction of 28,600 square feet commercial retail space; 935,000 square feet office

and non-retail commercial space; and 2.2 acres of undeveloped park. The North and Central Districts would be developed with a mix of residential and retail commercial uses while the South District would be developed with office and non-retail commercial uses. However, the mix of uses would be allowed in any of the three Districts. In addition to SDAPCD Rules 52 and 54 requirements to be implemented during all construction phases, emissions modeling also accounts for the use of low-VOC paint [100 grams per liter (g/L) for non-flat coatings] as required by SDAPCD Rule 67.

Table 5.5-5, *Estimated Maximum Construction Emissions by Project Phase*, summarizes the estimated maximum daily emissions of pollutants occurring during the construction period for each of the general grading/construction phases. As shown in Table 5.5-5, the daily, hourly and annual standards would not be exceeded during any phase of project construction. Construction impacts to air quality would be less than significant.

To minimize daily ROG emissions associated with painting during all phases, the painting phase would extend over an 11-month period generally beginning in June 2024 with residual painting occurring through May 2026. By overlapping the painting phase of the project with the Phase I building construction phase and early site preparation work associated with Phase II, daily emissions relative to ROG would be reduced to below the significance threshold.

Operational Emissions

Operational emissions include emissions from electricity consumption (energy sources), vehicle trips (mobile sources), area sources, landscape equipment, and evaporative emissions as the structures are repainted over the life of the project. The majority of operational emissions are associated with vehicle trips to and from the project site and area emissions associated with operation of the residential buildings, use of consumer products and landscaping equipment. The emissions are based on known factors and may be less with improved efficiencies in vehicle and maintenance equipment emissions. Table 5.5-6, *Estimated Operational Emissions*, summarizes daily, hourly, and annual emissions associated with the operation of the project.

As shown in Table 5.5-6, the total emissions under Phases I, II, and III would not exceed the daily, hourly, or annual thresholds for pollutants modeled. The cumulative total for all phases would not exceed the daily standards for NO_x, SO_x and PM_{2.5}. However, the daily ROG, CO, and PM₁₀ would be exceeded as would the tons/year threshold for ROG, CO, and PM₁₀. The majority of the emissions are associated with operation of vehicles by residents, commercial tenants, and retail customers as well as energy, consumer products, and landscaping equipment emissions-associated operation and maintenance of buildings. Thus, the project's regional air quality impacts (including impacts related to criteria pollutants, sensitive receptors, and violations of air quality standards) would be significant. The project would also result in a cumulatively considerable and significant net increase in PM₁₀ and ozone precursor emissions.

Because of the size and scope of the proposed development, there are no feasible methods for reducing all cumulative emissions to meet daily SDAPCD standards for ROG, CO, and PM₁₀ and the

annual standard for PM₁₀. Therefore, operational impacts to air quality would be regarded as cumulatively significant.

Significance of Impacts

The project would not result in significant direct air quality impacts during construction. However, the project would result in cumulatively significant air quality impacts associated with project operations at buildout. These impacts are unavoidable and cannot be mitigated to below a level of significance.

Mitigation Measures

Based on the size and scope of development, there are no feasible methods for reducing all cumulative emissions to meet daily SDAPCD standards for ROG, CO, and PM₁₀ and the annual standard for PM₁₀ due to the projected increase in traffic associated with project buildout. Operational impacts remain significant and unmitigable.

Table 5.5-6. Estimated Operational Emissions

	Estimated Emissions (lbs/day)					
	ROG	NOx	CO	SO _x	PM ₁₀	PM _{2.5}
Phase I						
Area	56.9	1.8	157.8	0.01	0.8	0.8
Energy	0.4	4.2	2.0	0.02	0.3	0.3
Mobile	16.0	56.4	131.4	0.4	39.7	10.8
Maximum lbs/day	73.4	62.4	291.2	0.4	40.9	12.0
Phase II						
Area	64.3	2.2	197	0.01	1.1	1.1
Energy	0.5	4.4	1.9	0.02	0.3	0.3
Mobile	12.1	48.1	101.2	0.3	37.6	10.2
Maximum lbs/day	76.9	54.9	300.2	0.4	39.1	11.6
Phase III						
Area	27.4	0.01	0.3	0.01	0.01	0.01
Energy	0.5	5.0	4.2	0.03	0.3	0.3
Mobile	9.7	43.8	104.6	0.4	50.9	13.7
Maximum lbs/day	37.7	48.9	109.2	0.4	51.3	14.1
Cumulative Total	188	166.2	701.3	1.24	131.3	37.7
<i>SDAPCD Thresholds</i>	<i>137</i>	<i>250</i>	<i>550</i>	<i>250</i>	<i>100</i>	<i>67</i>
Maximum lbs/hour	--	6.9	29.2	0.05	--	--
<i>SDAPCD Thresholds</i>	--	25	100	25	--	--
Maximum tons/annually	34.3	30.3	128	0.25	23.9	--
<i>SDAPCD Thresholds</i>	<i>15</i>	<i>40</i>	<i>100</i>	<i>40</i>	<i>15</i>	--
Threshold Exceeded?	Yes	No	Yes	No	Yes	No

Note – Hourly emissions were calculated by dividing daily emissions by 24. Annual emissions were calculated by multiplying daily emissions by 365 and dividing by 2,000.

5.3.3.3 Issue 4

Issue 4 Would the project create objectionable odors affecting a substantial number of people?

Impact Threshold

Per the City's CEQA Significance Determination Thresholds (City of San Diego 2016), *determining the significance of potential odor impacts should be based on what is known about the quantity of the odor compound(s) that would result from the project's proposed use(s), the types of neighboring uses potentially affected, the distance(s) between the project's point source(s) and the neighboring uses such as sensitive receptors, and the resultant concentration(s) at receptors.*

For a project proposing placement of sensitive receptors near an existing odor source, a significant odor impact will be identified if the project site is closer to the odor source than any existing sensitive receptor where there has been more than one confirmed or three confirmed complaints per year (averaged over a three week period) about the odor source. Projects proposing placement of sensitive receptors near a source of odors where there is currently no nearby existing receptors, the determination of significance should be based on the distance and frequency at which odor complaints from the public have occurred in the vicinity of a similar odor source at another location.

Analysis

Construction

The Riverwalk project would involve the use of diesel-powered construction equipment. The project could produce odors during the construction activities resulting from construction equipment exhaust, application of asphalt, and/or the application of architectural coatings; however, standard construction practices would minimize the odor emissions and their associated impacts. Furthermore, odors emitted during construction would be temporary, short-term, and intermittent in nature, and would cease upon the completion of construction.

Operation

The project does not include industrial or agricultural uses that are typically associated with objectionable odors. The project would include filtered HVAC systems throughout the building(s) and ventilation filters/hoods for the kitchen areas to avoid or minimize odors associated with food preparation within the commercial/retail buildings.

Significance of Impacts

The project would not result in significant air quality impacts associated with odors.

Mitigation Measures

Mitigation would not be required.

5.3.3.4 Issue 5

Issue 5 Would the project result in exposing sensitive receptors to substantial pollutant concentrations?

Impact Threshold

Based on the City's CEQA Significance Determination Threshold, a project would have a potentially significant air quality environmental impact if it would:

- *Expose sensitive receptors to substantial pollutant concentrations including air toxics such as diesel particulates.*
- *Result in a CO hotspot.*

Analysis

Toxic Air Contaminants

The largest potential for toxic air contaminant emissions would be related to diesel particulate emissions associated with heavy equipment operations during construction of the proposed project. According to South Coast Air Quality Management District (SCAQMD) methodology, health effects from carcinogenic air toxics are usually described in terms of "individual cancer risk". The California Office of Environmental Health Hazard Assessment (OEHHA) health risk guidance states that a residential receptor should be evaluated based on a 30-year exposure period. "Individual Cancer Risk" is the likelihood that a person exposed to concentrations of toxic air contaminants over a 70-year lifetime will contract cancer, based on the use of standard risk-assessment methodology. Given the short-term construction schedule, project would not result in a long-term (i.e., 30- or 70-year) exposure to a substantial source of toxic air contaminant emissions; and thus, would not be exposed to the related individual cancer risk. Therefore, no significant short-term toxic air contaminant impacts would occur during construction of the project.

Other significant sources of emissions in proximity to the project area are associated with operation of I-8, Friars Road, Fashion Valley Road, and Hotel Circle North. CARB recommends siting new sensitive uses more than 500 feet from a freeway, urban roads with 100,000 vehicles per day, or rural roads with 50,000 vehicles per day. Per the project-specific TIA, for urban roads surrounding the project, the highest segment volumes on Friars Road and Fashion Valley Road under 2035 conditions would be 28,500 vehicles per day. The highest volumes on Hotel Circle North would be 11,890 vehicles per day. The urban road volumes would not exceed 100,000 vehicles per day. Therefore, CARB's recommendation that residential uses be located more than 500 feet from an urban road carrying more than 100,000 vehicles would not apply.

The North and Central Districts, located approximately 2,000 feet north of I-8, are planned as mixed-use neighborhoods with predominantly residential development and retail commercial space. The

South District is planned for employment uses, predominantly office space with some retail commercial use. However, the Riverwalk Specific Plan allows for flexibility in the amount and location of land uses. Therefore, future residential development could also occur in the South District.

I-8 is located immediately south of and parallel to Hotel Circle North. As mentioned above, residential uses could occur in the South District as part of future mixed-use development, which would be within 500 feet from a freeway. Localized vehicular emissions from traffic on I-8 have the potential to create particulate matter at levels that could affect sensitive receptors, such as residential units closest to the freeway, should such uses occur within the South District. To minimize exposure of sensitive receptors to diesel particulate matter and other emissions associated with traffic operating on I-8, the Riverwalk Specific Plan includes the following design features that would be implemented as part of future residential development that could occur in the South District:

Riverwalk Specific Plan Reg-195. For any residential uses occurring in the South District, the project applicant shall install air filtration devices rated minimum efficiency reporting value (MERV-13) or higher in the intake of ventilation systems for residences constructed in the South District. HVAC systems shall be installed with a fan unit designed to force air through the MERV filter. Prior to issuance of building permits, the project applicant shall submit evidence to the City of San Diego to ensure compliance with this measure. To ensure long-term maintenance and replacement of the MERV filters in the individual residential units, the owner/property manager of residential units shall maintain and replace MERV filters in accordance with the manufacturer's recommendations. The owner/property manager of residential units shall keep a record of activities related to maintenance of the filters.

Riverwalk Specific Plan Reg-196. For any residential uses occurring in the South District, design residential buildings so that the air intakes do not occur on the southern side of buildings and away from I-8, to the extent feasible.

With implementation of these Specific Plan policies, health risks associated with particulate matter from vehicular emissions generated by traffic on I-8 would be reduced to below a level of significance.

Carbon Monoxide Hotspots

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. The SDAB is in attainment of State and Federal CO standards; thus, CO data is no longer collected and not all monitoring stations have CP data available. The 1110 Beardsley Street monitoring station in the Barrio Logan community is the closest monitoring station to the project site that provides CO data. The maximum eight-hour average CO level recorded in

2012 (the last year data were recorded) was 1.81 ppm. Concentrations are below the nine-ppm State and Federal eight-hour standard.

Although CO is not a regional air quality concern in SDAB, elevated CO levels can occur at or near intersections that experience severe traffic congestion. A localized air quality impact is considered significant if the additional CO emissions resulting from the project create a “hot spot” where the California one-hour standard of 20.0 ppm or the eight-hour standard of nine ppm is exceeded. This can occur at severely congested intersections during cold winter temperatures.

Because of more stringent requirements for cleaner vehicles, equipment, and fuels, CO levels across California have dropped substantially. All air basins are attainment or maintenance areas for CO. Therefore, recent screening procedures based on current methodologies have been developed. The Sacramento Metropolitan Air Quality Management District (SMAQMD) developed a screening threshold in 2011, which states that any project involving an intersection with 31,600 vehicles per hour or more will require detailed analysis. In 2010, the Bay Area Air Quality Management District developed a screening threshold that states that any project affecting an intersection with 44,000 vehicles per hour would require detailed analysis. Sacramento and San Diego have the same Federal and State CO attainment designations; and thus, experience similar concentrations of CO. Screening volumes are appropriate for evaluating CO impacts in the SDAB. This analysis conservatively assesses potential CO hot spots using the lower SMAQMD screening threshold of 31,600 vehicles per hour. This screening volume has also been utilized by the South Coast Air Quality Management District, which also has the same CO designation.

The project was evaluated for CO hotspots under full buildout conditions in the year 2035. The threshold of 31,600 vehicles per hour referenced would not be met at any of the intersections evaluated in the project study area. Therefore, the project would not result in CO hot spots. No further evaluation with respect to CO hotspots is required.

Significance of Impacts

Project construction would not result in long-term exposure to a substantial source of toxic air contaminant emissions and related individual cancer risk. The project would not result in CO hot spots. Future residential development that could occur in the South District would be located within 500 feet of I-8. Residents of the South District could be exposed to levels of particulate matter from vehicular emissions associated with traffic on I-8. To preclude the potential for significant health risks to sensitive receptors, specific policies are included in the Riverwalk Specific Plan that would apply to future residential development in the South District. Project impacts are less than significant.

Mitigation Measures

Mitigation would not be required.

Table 5.5-5. Estimated Maximum Construction Emissions by Project Phase

Construction Phase	Maximum Emissions (lbs/day)					
	ROG	NOx	CO	SO _x	PM ₁₀	PM _{2.5}
Phase I						
2021 Maximum lbs/day	17.2	199.5	136.5	0.6	33.3	11.9
2022 Maximum lbs/day	10.0	67.8	80.6	0.3	21.7	6.5
2023 Maximum lbs/day	9.1	56.0	75.7	0.3	21.5	6.3
.	8.7	54.2	72.2	0.3	21.4	6.2
2025 Maximum lbs/day	116.5	2.8	94.0	0.3	25.4	7.6
2026 Maximum lbs/day	108.0	10.3	24.6	0.05	4.0	1.4
<i>City of San Diego Screening Thresholds</i>	<i>137</i>	<i>250</i>	<i>550</i>	<i>250</i>	<i>100</i>	<i>67</i>
2021 Maximum lbs/hour	--	24.9	17.0	0.075	--	--
2022 Maximum lbs/hour	--	8.4	10.1	0.03	--	--
2023 Maximum lbs/hour	--	7.0	9.4	0.03	--	--
2024 Maximum lbs/hour	--	6.7	9.0	0.03	--	--
2025 Maximum lbs/hour	--	7.9	11.8	0.3	--	--
2026 Maximum lbs/hour	--	1.2	3.0	0.0063	--	--
<i>City of San Diego Screening Thresholds</i>	--	<i>25</i>	<i>100</i>	<i>25</i>	--	--
2021 Maximum lbs/year	2.21	25.9	17.8	0.07	4.3	--
2022 Maximum lbs/year	1.3	8.8	10.5	0.04	2.8	--
2023 Maximum tons/year	1.1	7.3	9.8	0.04	2.8	--
2024 Maximum tons/year	1.13	7.1	9.4	0.04	2.8	--
2025 Maximum tons/year	15.2	8.1	12.2	0.04	3.3	--
2026 Maximum lbs/year	14.1	1.3	3.2	0.007	0.5	--
<i>City of San Diego Screening Thresholds</i>	<i>15</i>	<i>40</i>	<i>100</i>	<i>40</i>	<i>15</i>	--
Threshold Exceeded 2021	No	No	No	No	No	No
Threshold Exceeded 2022	No	No	No	No	No	No
Threshold Exceeded 2023	No	No	No	No	No	No
Threshold Exceeded 2024	No	No	No	No	No	No
Threshold Exceeded 2025	No	No	No	No	No	No
Threshold Exceeded 2026	No	No	No	No	No	No
Phase II						
2026 Maximum lbs/day	3.3	41.6	32.3	0.1	11.0	5.9
2027 Maximum lbs/day	13.1	93.9	105.6	0.5	39.1	11.0
2028 Maximum lbs/day	12.6	92.7	102.0	0.5	39.1	11.0
2029 Maximum lbs/day	12.1	91.4	98.6	0.5	39.1	11.0
2030 Maximum lbs/day	117.4	87.5	108.7	0.5	6.2	12.4
2031 Maximum lbs/day	105.8	1.6	12.6	0.04	45.0	1.6
<i>City of San Diego Screening Thresholds</i>	<i>137</i>	<i>250</i>	<i>550</i>	<i>250</i>	<i>100</i>	<i>67</i>
2026 Maximum lbs/hour	--	5.2	4.0	0.02	--	--
2027 Maximum lbs/hour	--	11.7	13.2	0.06	--	--
2028 Maximum lbs/hour	--	11.5	12.8	0.06	--	--
2029 Maximum lbs/hour	--	11.4	12.3	0.06	--	--
2030 Maximum lbs/hour	--	10.9	13.5	0.06	--	--
2031 Maximum lbs/hour	--	0.2	1.6	0.005	--	--
<i>City of San Diego Screening Thresholds</i>	--	<i>25</i>	<i>100</i>	<i>25</i>	--	--
2026 Maximum tons/year	0.43	5.4	4.2	0.013	1.4	--
2027 Maximum tons/year	1.7	12.2	13.7	0.06	5.1	--
2028 Maximum tons/year	1.6	12.1	13.3	0.06	5.1	--

Construction Phase	Maximum Emissions (lbs/day)					
	ROG	NOx	CO	SO _x	PM ₁₀	PM _{2.5}
2029 Maximum tons/year	1.6	11.9	12.8	0.06	5.1	--
2030 Maximum tons/year	15.2	11.4	14.1	0.06	0.8	--
2031 Maximum lbs/year	13.8	0.2	1.6	0.0006	5.9	--
<i>City of San Diego Screening Thresholds</i>	<i>15</i>	<i>40</i>	<i>100</i>	<i>40</i>	<i>15</i>	<i>--</i>
Threshold Exceeded 2026	No	No	No	No	No	No
Threshold Exceeded 2027	No	No	No	No	No	No
Threshold Exceeded 2028	No	No	No	No	No	No
Threshold Exceeded 2029	No	No	No	No	No	No
Threshold Exceeded 2030	No	No	No	No	No	No
Threshold Exceeded 2031	No	No	No	No	No	No
Phase III						
2031 Maximum lbs/day	3.8	35.0	36.6	0.2	10.8	5.5
2032 Maximum lbs/day	3.6	34.7	36.0	0.2	10.0	2.8
2033 Maximum lbs/day	3.5	34.5	35.5	0.2	10.0	2.8
2034 Maximum lbs/day	3.4	34.3	35.0	0.2	10.04	2.8
2035 Maximum lbs/day	94.4	33.3	34.5	0.2	9.9	2.8
2036 Maximum lbs/day	94.4	0.9	3.9	0.01	1.4	0.4
<i>City of San Diego Screening Thresholds</i>	<i>137</i>	<i>250</i>	<i>550</i>	<i>250</i>	<i>100</i>	<i>67</i>
2031 Maximum lbs/hour	--	4.3	4.5	0.025	--	--
2032 Maximum lbs/hour	--	4.3	4.5	0.025	--	--
2033 Maximum lbs/hour	--	4.3	4.5	0.025	--	--
2034 Maximum lbs/hour	--	4.3	4.5	0.025	--	--
2035 Maximum lbs/hour	--	4.3	4.3	0.025	--	--
2036 Maximum lbs/hour	--	0.1	0.48	0.0001	--	--
<i>City of San Diego Screening Thresholds</i>	<i>--</i>	<i>25</i>	<i>100</i>	<i>25</i>	<i>--</i>	<i>--</i>
2031 Maximum tons/year	0.49	4.5	4.7	0.02	1.4	--
2032 Maximum tons/year	0.5	4.5	4.7	0.02	1.3	--
2033 Maximum tons/year	0.5	4.5	4.7	0.02	1.3	--
2034 Maximum tons/year	0.5	4.5	4.5	0.02	1.3	--
2035 Maximum tons/year	12.3	4.3	4.5	0.2	1.3	--
2036 Maximum lbs/year	12.3	0.11	0.5	0.001	0.18	--
<i>City of San Diego Screening Thresholds</i>	<i>15</i>	<i>40</i>	<i>100</i>	<i>40</i>	<i>15</i>	<i>--</i>
Threshold Exceeded 2031	No	No	No	No	No	No
Threshold Exceeded 2032	No	No	No	No	No	No
Threshold Exceeded 2033	No	No	No	No	No	No
Threshold Exceeded 2034	No	No	No	No	No	No
Threshold Exceeded 2035	No	No	No	No	No	No
Threshold Exceeded 2036	No	No	No	No	No	No

Note - Hourly emissions were calculated by dividing daily emissions by 8 (assuming an 8-hour workday).

Phase I annual emissions were calculated by multiplying daily emissions by 261 (assuming 261 total workdays annually) and dividing by 2,000. The annual ROG emissions for painting calculated for 11-month duration in 2024 with residual painting occurring through 2026.

Phase II annual emissions were calculated by multiplying daily emissions by 261 (assuming 261 total workdays annually) and dividing by 2,000. The annual ROG emissions for painting calculated for 6-month duration in 2029 and one month in 2030.

Phase III annual emissions were calculated by multiplying daily emissions by 365 and dividing by 2,000.

5.6 Historical Resources

This section evaluates potential impacts to historical resources associated with the project. The following discussion is based on the *Cultural Resources Inventory Report for the Riverwalk Project*, prepared by Spindrift Archaeological Consulting (October 2017), the *Addendum to the Class III Cultural Resource Inventory for the Riverwalk Project*, prepared by ASM Affiliates, Inc. (December 8, 2019), the *Historical Resources Technical Report*, prepared by ASM Affiliates, Inc. (December 2019) and the *Archaeological Research and Data Recovery Program for the Riverwalk Redevelopment Project* prepared by ASM Affiliates, Inc. (February 2020), included as Appendices G, H, I, and X respectively.

5.6.1 Existing Conditions

The project site is located within Mission Valley in central San Diego along the San Diego River which is a defining feature of the community. The valley sits at the crossroads of a regional freeway system, taking access from I-5, I-8, I-15, I-805, and SR 163. Mission Valley is a regional center of offices, hotels, retail businesses, and residential developments, as well as a major regional visitor center, with a concentration of hotels located in proximity to tourist attractions, including Mission Bay Park, Sea World, and Balboa Park.

The Specific Plan area slopes gently towards the river, which curves through the central portion of the site. The site has been previously graded and is developed with the Riverwalk Golf Course, comprised of three nine-hole golf courses, driving range, clubhouse building, maintenance facilities, surface parking, access roadways, and golf cart paths/bridges.

5.6.1.1 Prehistoric, Ethnohistoric and Historical Context

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

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

or remnants of structures.

Prehistoric

Exactly when the First People appeared in what is now San Diego County is uncertain. Ipai and Kumeyaay creation stories and travel songs tell of a gradual migration from the northeast from a place known as Wikamee. This magical, mystical place is probably near Needles, California close to the nourishing waters of the Colorado River. This region is the homeland for many Yuman-speaking tribes of Alta and Baja California including the Mojave, Quechan, Pai Pai, and Cocopah. To the native people who live in San Diego County today they strongly believe that they have always been here and that the categories and constructs developed by archaeologists are useful only to those persons who need such divisions.

Therefore, the prehistoric cultural constructs used by archaeologists and historians are generally thought of as three basic periods: Paleoindian, locally characterized by the San Dieguito complex; Archaic, characterized by the cobble and core technology of the La Jolla and Pauma complexes; and Late Prehistoric, marked by the appearance of ceramics, small arrow points, and cremation burial practices. Late Prehistoric materials in southern San Diego County, known as Yuman I and Yuman II, are believed to represent the ancestral Kumeyaay, (also known as the Iipay/Tipay).

The early people, labeled by many archaeologists as the San Dieguito and by others as those people who lived in the Early Archaic Period were largely hunters and gatherers. Most of the artifacts from 10,000 to 8,000 years ago are stone knives, spear points, small scrapers, and tools associated with chopping and cutting. The best evidence for the culture and technology of the San Dieguito comes from archaeological sites less than ten miles west of San Pasqual Valley and below Lake Hodges on the south bank of the San Dieguito River. Few artifacts from this era have been discovered in the Lakeside/El Cajon area. These early people were ancient master craftsmen of stone tools. Their spear points and knife blades rival those of ancient Europe. Faunal remains that would tell us what they ate and how they butchered their game are rare. Based on analogies to other hunters of the same time period, they probably hunted game such as antelope and ground sloths. Archaeologists have not yet discovered even fragmentary human remains with artifacts specifically from the San Dieguito pattern. We know nothing of their physical characteristics, or burial patterns. Similarly, beyond their stone tool-making capabilities, we know little of their technology.

By 8,000 years ago the ancient people responded to drastic environmental changes. Called the La Jolla pattern by some scholars and as occupants of the Middle Archaic by others, burial switched to inhumation (placement of the body in an excavated grave) with grave goods, probably dependent on class or wealth. Ornamentation, often found within burials, includes beads made from clams, olivella shells, and stone. Trade with the Channel Islands (Canaliño) tribes included importation of a soapstone unique to those islands and a variety of pipes, sucking tubes, effigies, and stone knife blades made by Canaliño. Trade with tribes far to the north included glassy obsidian stone from the Coso region near present-day Ridgecrest, California. On the coast, shellfish, fish, rabbits, and marine life from the bays were intensively hunted and collected. These people made and used either balsa rafts or canoes and extended their fishing into the deeper waters off San Diego's coast. Further inland, including the Lakeside and Santee area rabbits, hares, pond turtles, and wood rats provided

meat. Plants were collected and processed especially seeds and berries such as chia, buckwheat, holly-leaved cherry, chokecherry, and elderberry.

The Late Prehistoric Era of the Kumeyaay is thought to begin around 2,000-2,500 years before present (ybp) in San Diego. This era is typified by cremation of the dead, pottery manufacturing (Tizon Brown Ware), use of the bow and arrow, sedentary villages like the one at *Kosaii* at the foot of Presidio Hill, or *Apti* also known as Las Chollas located near 28th Street and Indian Point along the edge of San Diego Bay. A wider exploitation of the coast, inland valleys, and mountains, a dramatically increased population, and extensive use of acorns typified this era.

Cremation gradually came into the county sometime around 1,000 years ago with the introduction of pottery. Two other traits typify this period: the use of the bow and arrow and extensive exploitation of acorns. Acorn processing is labor intensive and includes cracking the acorn open, pulverizing the nut in a mortar, milling the pulverized pieces on a metate or bedrock milling basin/slick, winnowing, and leaching.

The Ipai/Tipai (Kumeyaay) of the immediate region often lived in bipolar rancherías with one village serving as a summer home in the mountains and one being occupied at the lower elevations in the winter. The San Diego River, which historically would occasionally turn and run into what is now Old Town near the project site, was a main source of water, travel, and resources.

The 10,000 years of Indian occupation in San Diego County is rarely matched anywhere else in the United States. The descendants of these ancient people, the various bands of Mission Indians can proudly point to their deep and enduring roots in southern California.

Specific to the project area twelve archaeological sites have been recorded within the project's boundaries. These sites have been recorded and evaluated by various archaeologists and consist of; lithic scatters, shell scatters, shell midden, and habitation sites. There was also a multi-component site that contained historic refuse along with prehistoric lithics and shell.

Ethnohistoric

The Ethnohistoric Period, sometimes referred to as the ethnographic present, commences with the earliest European arrival in what is now San Diego and continued through the Spanish and Mexican periods and into the American period. The founding of Mission San Diego de Alcalá in 1769 brought about profound changes in the lives of the Kumeyaay. The coastal Kumeyaay died from introduced diseases or were brought into the mission system. Earliest accounts of Native American life in what is now San Diego were recorded as a means to salvage scientific knowledge of native lifeways. The Kumeyaay are the identified Most Likely Descendants for all Native American human remains found in the City.

As described in the Mission Valley Community Plan EIR, *[b]y the time Spanish colonists began to settle in Alta California in 1769, the areas that are now part of the adjacent community of Old Town were within*

the territory of the Kumeyaay people, a cultural group comprised of exogamous, nontotemic territorial bands with patrilineal descent. The Kumeyaay had a hunting and gathering economy based primarily on various plant resources. Grass seeds were a staple food resource second only to acorns in the Late Prehistoric native diet, supplemented by other seeds and nuts. Small game such as rabbits, jackrabbits, and rodents were important to the prehistoric diet; deer were somewhat less significant for food, but were an important source of leather, bone, and antlers. Coastal bands ate a great deal of fish, taking them with lines, nets, and bows and arrows. Balsas or reed boats were used. Shellfish and other littoral resources were important to coastal people too. Settlements were moved seasonally to areas where wild foods were in season. Villages and campsites were generally located in areas where water was readily available, preferably on a year-round basis. The San Diego River, which bisects the area, provided an important resource not only as a reliable source of water, but as a major transportation corridor through the region. Major coastal villages were known to have existed along the San Diego River, including the village of Kosaii (also known as Cosoy or Kosa'aay) near the mouth of the San Diego River (Gallegos et al. 1998; Kroeber 1925), which took its name from the Kumeyaay word for drying place or dry place (Dumas 2011). This ranchería appears in the earliest of Spanish travelogues for the area, and was the village closest to the Presidio. Although the actual location of the village is unknown, it has been described as being near the mouth of the San Diego River, and also reported by Bancroft in 1884, that a site called Cosoy/Kosaii/Kosa'aay by the Native Americans was in the vicinity of Presidio Hill and Old Town.

Several additional large villages have been documented along the San Diego River through ethnographic accounts and archaeological investigations in the area. These include Nipaquay, located near present-day Mission San Diego de Alcalá (Kyle 1996); El Corral, located near present-day Mission Gorge; Santee Greens, located in present-day eastern Santee (Berryman 1981); and El Capitan, located approximately 25 miles upstream from the CPU, now covered by the El Capitan Reservoir (Pourade 1961). To the north was onap, a ranchería of a large settlement located in Rose Canyon; west of the I-5 was a large village known as hamo, jamo or Rinconada de Jamo, in present-day Pacific Beach; and further to the north was a prominent rancheria located in present-day Sorrento Valley known as Ystagua or istagua, a Spanish gloss of istaawah or istawah, and means worm's (larvae) house.

Historic

San Diego's historical context can be divided into three periods: the Spanish, Mexican, and American periods.

Spanish Period (AD 1769-1822)

In spite of Juan Cabrillo's earlier landfall on Point Loma in 1542, the Spanish colonization of Alta California did not begin until 1769. Concerns over Russian and English interests in California motivated the Spanish government to send an expedition of soldiers, settlers, and missionaries to occupy and secure the northwestern borderlands of New Spain. This was to be accomplished through the establishment and cooperative inter-relationship of three institutions: the Presidio, Mission, and Pueblo. In 1769, a land expedition led by Gaspár de Portola reached San Diego Bay, where they met those who had survived the trip by sea on the San Antonio and the San Carlos. Initially camp was made on the shore of the bay in the area that is now downtown San Diego. Lack

of water at this location, however, led to moving the camp on May 14, 1769 to a small hill closer to the San Diego River and near the Kumeyaay village of Cosoy. Father Junípero Serra arrived in July of the same year to find the Presidio serving mostly as a hospital. The Spanish built a primitive mission and presidio structure on the hill near the river. The first chapel was built of wooden stakes and had a roof made of tule reeds. Brush huts and temporary shelters were also built.

Bad feelings soon developed between the native Kumeyaay and the soldiers, resulting in construction of a stockade whose wall was made from sticks and reeds. By 1772, the stockade included barracks for the soldiers, a storehouse for supplies, a house for the missionaries and the chapel, which had been improved. The log and brush huts were gradually replaced with buildings made of adobe bricks. Flat earthen roofs were eventually replaced by pitched roofs with rounded roof tiles and clay floors were eventually lined with fired-brick.

In August 1774, the Spanish missionaries moved the Mission San Diego de Alcalá to its present location six miles up the San Diego River valley (modern Mission Valley), near the Kumeyaay village of Nipaguay. What started as a thatched jacal chapel and compound built of willow poles, logs and tules, the new Mission was sacked and burned in the Kumeyaay uprising of November 5, 1775. The first abode chapel was completed in October 1776, and the present church was built the following year. A succession of building programs through 1813 resulted in the final rectilinear plan that included the church, bell tower, sacristy, courtyard, residential complex, workshops, corrals, gardens, and cemetery. Orchards, reservoirs, and other agricultural installations were built to the south on the lower San Diego River alluvial terrace and were irrigated by a dam and aqueduct system.

In 1798, the Spanish constructed the Mission San Luis Rey de Francia in northern San Diego County. They also established three smaller mission outposts (asistencias) at Santa Ysabel, Pala, and Las Flores. The mission system had a great effect on all Native American groups from the coast to the inland areas and was a dominant force in San Diego County.

Mexican Period (AD 1822-1846)

In 1822 the political situation changed. Mexico won its independence from Spain, and San Diego became part of the Mexican Republic. The Mexican government opened California to foreign ships, and a healthy trade soon developed, exchanging the fine California cattle hides for the manufactured goods of Europe and the eastern United States. Several of these American trading companies erected rough sawn wood-plank sheds at La Playa on the bay side of Point Loma. The merchants used these "hide-houses" for storing the hides before transport to the east coast. As the hide trade grew, so did the need for more grazing lands. Thus, the Mexican government secularized in 1833. The mission system, however, had begun to decline when the Mission Indians became eligible for Mexican citizenship, and refused to work in the mission fields. The ranchos dominated California life until the American takeover in 1846. The Mexican Period brought about the continued displacement and acculturation of the native populations.

American Period (AD 1846-PRESENT)

When United States military forces occupied San Diego in July 1846, the town's residents split on their course of action. Many of the town's leaders sided with the Americans, while other prominent families opposed the United States invasion. A group of Californios under Andres Pico, the brother of the Governor Pio Pico, harassed the occupying forces in Los Angeles and San Diego during 1846. In December 1846, Pico's Californios engaged U.S. Army forces under General Stephen Kearney at the Battle of San Pasqual and inflicted many casualties. However, the Californios resistance was defeated in two small battles near Los Angeles and effected ended by January 1847.

The Americans raised the United States flag in San Diego in 1846 and assumed formal control with the Treaty of Guadalupe-Hidalgo in 1848. In the quarter of a century following 1848, the Americans transformed the Hispanic community into a thoroughly Anglo-American one, introducing Anglo culture and society, American political institutions, and especially American entrepreneurial commerce. By 1872, the center of the city and community was relocated to a new location that was more accessible to the bay and to commerce. Expansion of trade brought an increase in the availability of building materials. Wood buildings gradually replaced adobe structures. Some of the earliest buildings to be erected in the American Period were "pre-fab" houses, which were built on the east coast of the United States and shipped in sections around Cape Horn and reassembled in San Diego.

In 1850, the Americanization of San Diego began to develop rapidly. On February 18, 1850, the California State Legislature formally organized San Diego County. The first elections were held at San Diego and La Playa on April 1, 1850 for County officials. San Diego grew slowly during the next decade. San Diegans attempted to develop the town's interests through a transcontinental railroad plan and the development of a new town closer to the bay. The failure of these plans, added to a severe drought that crippled ranching, as well as the onset of the Civil War in the eastern United States, left San Diego as a remote frontier town. The troubles led to an actual drop in the town's population from 650 in 1850 to 539 in 1860. Not until land speculator and developer Alonzo Horton arrived in 1867 did San Diego begin to develop fully into an active American town.

Alonzo Horton's development of a New San Diego (modern downtown) in 1867 began to swing the community focus away from Old Town. After the County seat was moved in 1871 and a fire destroyed a major portion of the business block in April 1872, Old Town rapidly declined in importance.

There was farming and ranching in Mission Valley until the middle portion of the Twentieth Century, when the land uses were converted to commercial and residential. Dairy farms and chicken ranches were located along the San Diego River where now are motels, restaurants, office complexes, regional shopping malls, and residential developments. In, 1947 the site was designed and developed as a golf course by Lawrence M. Hughes. It was redesigned by Ted Robinson, Sr., in 1998 as the Riverwalk Golf Course.

5.6.1.2 Built Environment

The Riverwalk golf course is a 27-hole golf course strategically squeezed into an urban setting with undulating hills that partner with bunkers to guard tees against seasoned golfers. The original 1947 course was designed by Lawrence M. Hughes without a clubhouse, only a shack for drinks and sandwiches. The 1998 complete redesign by Ted G. Robinson, Sr. included a clubhouse. Today, the golf course includes a clubhouse, two maintenance sheds, and ancillary supporting buildings including restroom buildings, two bridges, two MTS-constructed tunnels through the MTS berm for Friars course access, pump/lift stations, and a driving range. The golf course was constructed around the San Diego River. When it was reconstructed in 1998, the river was incorporated into the course play.

5.6.2 Regulatory Framework

As described in the City of San Diego's *California Environmental Quality Act Significance Determination Thresholds* (2016), Federal, State, and local criteria have been established for the determination of historical resource significance. The criteria for determining a resource's significance generally focus on a resource's integrity and uniqueness, its relationship to similar resources, and its potential to contribute important information to scholarly research. Some resources that do not meet Federal significance criteria may be considered significant under State or local criteria.

5.6.2.1 Federal

National Historic Preservation Act

The National Historic Preservation Act (NHPA) establishes the Federal government policy on historic preservation and the programs – including the National Register of Historic Places (NRHP) – through which this policy is implemented. Under the NHPA, significant cultural resources, referred to as historic properties, include any prehistoric or historic district, site, building, structure, or object included in, or eligible for inclusion in, the NRHP. Historic properties also include resources determined to be National Historic Landmarks (NHL). NHLs are national significant historic places designated by the Secretary of the Interior (SOI) because they possess exceptional value or quality in illustrating or interpreting United States heritage. A property is considered historically significant if it meets one of the NRHP criteria and retains sufficient historic integrity to convey its significance. This act also established the Advisory Council on Historic Preservation (ACHP), an independent agency responsible for implementing Section 106 of NHPA by developing procedures to protect cultural resources included on, or eligible for inclusion, on the NRHP. Regulations are published in 36 CFR Part 60 and 63, and 36 CFR, Part 800. A property is considered historically significant if it meets one of the NRHP criteria listed below and retains sufficient historic integrity to convey its significance.

- A. That are associated with events that have made a significant contribution to the broad patterns of our history; or

- B. That are associated with the lives of persons significant in our past; or
- C. That embody the distinctive characteristics of a type, period, or method of construction. Or that represent the work of a master, or that possess high artistic values, or that represent a significant and distinguishable entity whose components may lack individual distinction; or
- D. That have yielded, or may be likely to yield, information important in prehistory or history.

Ordinarily cemeteries, birthplaces, or graves of historical figures, properties owned by religious institutions or used for religious purposes, structures that have been moved from their original locations, reconstructed historic buildings, properties primarily commemorative in nature, and properties that have achieved significance within the past 50 years shall not be considered eligible for the National Register. However, such properties will qualify individually if they fall within the following categories:

- A. A religious property deriving primary significance from architectural or artistic distinction or historical importance; or
- B. A building or structure removed from its original location but which is significant primarily for architectural value, or which is the surviving structure most importantly associated with a historic person or event; or
- C. A birthplace or grave of a historical figure of outstanding importance if there is no appropriate site or building directly associated with his productive life; or
- D. A cemetery which derives its primary significance from graves of persons of transcendent importance, from age, from distinctive design features, or from association with historic events; or
- E. A reconstructed building when accurately executed in a suitable environment and presented in a dignified manner as part of a restoration master plan, and when no other building or structure with the same association has survived; or
- F. A property primarily commemorative in intent, if design, age, tradition, or symbolic value has invested it with its own exceptional significance; or
- G. A property achieving significance within the past 50 years if it is of exceptional importance.

5.6.2.2 State

California Register of Historic Resources and CEQA

The CRHR was established in 1992. Similar to the NRHP, the CRHR program encourages public recognition and protection of resources of architectural, historical, archaeological, and cultural significance; identifies resources for planning purposes; determines eligibility of state historic grant funding; and provides certain protections under CEQA. A property is eligible for listing on the state register if it meets one of the following designation criteria.

1. Associated with events that have made a significant contribution to the broad patterns of local or regional history or the cultural heritage of California or the United States.
2. Associated with the lives of persons important to local, California or national history.
3. Embodies the distinctive characteristics of a type, period, region or method of construction or represents the work of a master or possesses high artistic values.
4. Has yielded, or has the potential to yield, information important to the prehistory or history of the local area, California or the nation.

CEQA was amended in 1992 to define “historical resources” as a resource listed in or determined eligible for listing on the California Register, a resource included in a local register of historical resources or identified as significant in a historical resource survey that meets certain requirements, and any object, building, structure, site, area, place, record, or manuscript which a lead agency determines to be significant. Some resources that do not meet these criteria may still be historically significant for the purposes of CEQA.

CEQA sections 15064.5 and 21083.2(g) define the criteria for determining the significance of historical resources. Archaeological resources are considered “historical resources” for the purposes of CEQA. Most archaeological sites which qualify for the CRHR do so under criterion 4 (i.e., research potential). Since resources that are not listed or determined eligible for the State or local registers may still be historically significant, their significance shall be determined if they are affected by a project.

California Public Resources Code

Sections 5097–5097.6 of the PRC outline the requirements for cultural resource analysis prior to the commencement of any construction project on State lands. The State agency proposing the project may conduct the cultural resource analysis or they may contract with the State Department of Parks and Recreation. In addition, this section stipulates that the unauthorized disturbance or removal of archaeological, historical, or paleontological resources located on public lands is a misdemeanor. It prohibits the knowing destruction of objects of antiquity without a permit (expressed permission) on public lands and provides for criminal sanctions. This section was amended in 1987 to require consultation with the California Native American Heritage Commission (NAHC) whenever Native American graves are found. Violations for the taking or possessing of remains or artifacts are felonies.

California Health and Safety Code

Section 7052 of the California Health and Safety Code (H&SC) makes the willful mutilation, disinterment, or removal of human remains a felony. Section 7050.5 requires that construction or excavation be stopped in the vicinity of discovered human remains until the coroner can determine whether the remains are those of a Native American. If determined to be Native American, the coroner must contact the NAHC. H&SC Section 8010-8030 constitutes the California Native American Graves Protection and Repatriation Act of 2001 (CALNAGPRA). CALNAGPRA, like the Federal act,

ensures that Native American human remains and cultural items are treated with respect and dignity during all phases of the archaeological evaluation process in accordance with CEQA and any applicable local regulations. The code provides a process and requirements for the identification and repatriation of collections of human remains or cultural items to the appropriate tribes from any State agency or museum that receives State funding.

California Government Code Section 65040.2(g)

California Government Code Section 65040.2(g) provides guidelines for consulting with Native American tribes for the following: (1) the preservation of, or the mitigation of impacts to places, features, and objects described in sections 5097.9 and 5097.993 of the Public Resources Code; (2) procedures for identifying through the NAHC the appropriate California Native American tribes; (3) procedures for continuing to protect the confidentiality of information concerning the specific identity, location, character, and use of those places, features, and objects; and (4) procedures to facilitate voluntary landowner participation to preserve and protect the specific identity, location, character, and use of those places, features, and objects.

Native American Burials (PRC Section 5097 et seq.)

State law addresses the disposition of Native American burials in archaeological sites and protects such remains from disturbance, vandalism, or inadvertent destruction; establishes procedures to be implemented if Native American skeletal remains are discovered during construction of a project; and designates the NAHC to resolve disputes regarding the disposition of such remains. The Native American Historic Resource Protection Act (PRC sections 5097.993 - 5097.994) makes it a misdemeanor punishable by up to a year in jail to deface or destroy an Indian historic or cultural site that is listed or may be eligible for listing in the CRHR. In 2006, Assembly Bill (AB) 2641 (Coto) amended the PRC to provide for the protection of human remains when discovered, as well as conferral with descendants to make recommendations or preferences for treatment of human remains. A landowner, upon discovery of human remains, is required to ensure that the immediate vicinity, as described, is not damaged or disturbed, until specific conditions are met, including discussing and conferring, as defined, with the descendants regarding their preferences for treatment. The amended PRC, along with the California Native American Graves and Repatriation Act [NAGPRA] of 2001 [Health and Safety Code 8010-8011]) ensures that Native American human remains and cultural items are treated with respect and dignity.

Senate Bill 18

Signed into law in September 2004, and effective March 1, 2005, Senate Bill (SB) 18 permits California Native American tribes recognized by the NAHC to hold conservation easements on terms mutually satisfactory to the tribe and the landowner. The term "California Native American tribe" is defined as "a federally recognized California Native American tribe or a non-federally recognized California Native American tribe that is on the contact list maintained by the NAHC." The bill also requires that, prior to the adoption or amendment of a city or county's general plan, the city or county consult with California Native American tribes for the purpose of preserving specified places,

features, and objects located within the city or county's jurisdiction. SB 18 also applies to the adoption or amendment of specific plans. This bill requires the planning agency to refer to the California Native American tribes specified by the NAHC and to provide them with opportunities for involvement.

Assembly Bill 52

AB 52, which created the new category of "tribal cultural resources" that must be considered under CEQA, applies to all projects that file a notice of preparation or notice of negative declaration or mitigated negative declaration on or after July 1, 2015. AB 52 requires lead agencies to provide notice to and begin consultation with California Native American tribes that are traditionally and culturally affiliated with the geographic area of a project if that tribe has requested, in writing, to be kept informed of projects by the lead agency prior to the determination whether a negative declaration, mitigated negative declaration, or environmental impact report will be prepared. If a tribe requests consultation within 30 days upon receipt of the notice, the lead agency must consult with the tribe. The bill also specifies mitigation measures that may be considered to avoid or minimize impacts on tribal cultural resources.

5.6.2.3 Local

City of San Diego General Plan

The Historical Preservation Element of the City of San Diego's *General Plan* was adopted in 2008. The stated goals of the Historic Preservation Element are:

- *Identification of the historical resources of the City.*
- *Preservation of the City's important historical resources.*
- *Integration of historic preservation planning in the larger planning process.*
- *Public education about the importance of historical resources.*
- *Provision of incentives supporting historic preservation.*
- *Cultural heritage tourism promoted to the tourist industry.*

To achieve these goals, the Historic Preservation Element provides nine policies to guide historical resources management activities. Among these are the following:

- *HP-A.1 Strengthen historic preservation planning.*
- *HP-A.2 Fully integrate the consideration of historical and cultural resources in the larger land use planning process.*
- *HP-A.3 Foster government-to-government relationships with the Kumeyaay/Diegueño tribes of San Diego.*
- *HP-A.4 Actively pursue a program to identify, document, and evaluate the historical and cultural resources in the City of San Diego.*
- *HP-A.5 Designate and preserve significant historical and cultural resources for current and future*

generations.

- *HP-B.1 Foster greater public participation and education in historical and cultural resources.*
- *HP-B.2 Promote the maintenance, restoration, and rehabilitation of historical resources through a variety of financial and development incentives. Continue to use existing programs and develop new approaches as needed. Encourage continued private ownership and utilization of historic structures through a variety of incentives.*
- *HP-B.3. Develop a historic preservation sponsorship program.*
- *HP-B.4 Increase opportunities for cultural heritage tourism.*

Historical Resources Regulations

The purpose and intent of the City's Historical Resources Regulations of the LDC (Chapter 14, Division 3, and Article 2) is to protect, preserve and, where damaged, restore the historical resources of San Diego, which include historical buildings, historical structures or historical objects, important archaeological sites, historical districts, historical landscapes, and traditional cultural properties. These regulations are intended to ensure that development occurs in a manner that protects the overall quality of historical resources. The Historic Resources Regulations require that development affecting designated historical resources or historical districts shall provide full mitigation for the impact to the resource, in accordance with the Historical Resources Guidelines of the Land Development Manual (LDM), as a condition of approval. If development cannot, to the maximum extent feasible, comply with the development regulations for historical resources, then a project would require a Site Development Permit.

Historical Resources Guidelines (HRG) of the Land Development Manual

The HRG, located in the City's Land Development Manual, provides property owners, the development community, consultants, and the general public explicit guidance for the management of historical resources located within the City's jurisdiction. These guidelines are designed to implement the historical resources regulations and guide the development review process. The guidelines also address the need for a survey and how impacts are to be assessed, available mitigation strategies, and reporting requirements. They also include appropriate methodologies for treating historical resources located in the City.

City of San Diego Historical Resources Register

The City of San Diego also maintains a Historical Resources Register. Per the City, any improvement, building, structure, sign, interior element and fixture, feature, site, place, district, area, or object may be designated as historic by the City of San Diego Historical Resources Board if it meets any of the following criteria:

- a. Exemplifies or reflects special elements of the City's, a community's, or a neighborhood's historical, archaeological, cultural, social, economic, political, aesthetic, engineering, landscaping, or architectural development;
- b. Is identified with persons or events significant in local, State, or national history;

- c. Embodies distinctive characteristics of a style, type, period, or method of construction or is a valuable example of the use of indigenous materials or craftsmanship;
- d. Is representative of the notable work of a master builder, designer, architect, engineer, landscape architect, interior designer, artist, or craftsman;
- e. Is listed or has been determined eligible by National Park Service for listing on the National Register of Historic Places or is listed or has been determined eligible by the State Historic Preservation Office (SHPO) for listing on the State Register of Historical Resources; or
- f. Is a finite group of resources related to one another in a clearly distinguishable way or is a geographically definable area or neighborhood containing improvements which have a special character, historical interest, or aesthetic value or which represent one or more architectural periods or styles in the history and development of the City.

5.6.3 Methodology

Archaeology

In order to determine if the project would result in impacts to historical resources, a record search, background research, and literature review of previous fieldwork was conducted. The records search for the project site was completed by the San Diego Museum of Man on September 25, 2017, and an in-house records search was completed at the South Coastal Information Center (SCIC) of the California Historical Resources Information System (CHRIS) at San Diego State University on September 20, 2017. The purpose of the records search was to determine the extent of previous surveys within a one-mile (1600-meter) radius of the project location, and whether previously documented prehistoric or historic archaeological sites, architectural resources, or traditional cultural properties exist within the project site. In addition to the official records and maps for archaeological sites and surveys in San Diego County, the following historic references were also reviewed: Historic Property Data File for San Diego County; The National Register Information System website; California Historical Landmarks; and California Points of Historical.

Built Environment

As no original or as-built drawings were available for the 1947 Hughes-designed golf course, historical aerials and oblique aerials were used to assess the terrain of the golf course and changes made prior to the redesign by Ted Robinson Sr./Jr. in 1998. The golf course layout was overlaid onto historic aerials from 1953, 1964, 1980, 1989, 1994, 1994, and 2002 in determine if the 1998 Robinson redesign was a complete redesign of the 1947 course. An attempt was made to acquire building records at the San Diego County Assessor's Office; however, no records exist for this property. Research was conducted at San Diego State University, San Diego History Center, and other repositories; and newspaper and golf magazine articles regarding the golf course were reviewed. Archival research was used to develop a National, state, and regional golf and architectural design context; to develop a brief history of the development of the course and changes made to the course; and to review portfolios for Lawrence M. Hughes and Ted Robinson, Sr. The American Society of Golf Course Architects' was contacted for information on Ted Robinson, Sr., and a

personal interview with Ted Robinson, Jr. was conducted.

A historic resource field survey was conducted on June 12, 2018, via golf cart and on foot. Multiple photographs were taken during the survey of the golf course including the grounds, holes, landscape features, viewshed, pump lift stations, two tunnels, concrete cart foot paths, and buildings including club house, two maintenance sheds, and small restroom buildings. Layout, flow, playability, condition, landscape architecture features (tees, fairways, rough, greens, bunkers, and hazards), and historical integrity were noted. In order to determine if the Riverwalk Golf Course might be a historic district, particular attention was paid to the similarities and differences between the three courses, as well as the relationship and age of the remaining buildings.

5.6.4 Impact Analysis

5.6.4.1 Issue 1

Issue 1 Would the proposal result in an alteration, including adverse physical or aesthetic effects, and/or the destruction of a prehistoric or historic building (including an architecturally significant building, structure, object, or site)?

Impact Thresholds

Based on the current City of San Diego's Significance Determination Thresholds, historical resource impacts may be significant if the project would affect any of the following:

- A resource listed in, eligible, or potentially eligible for listing in the NRHP.
- A resource listing in, eligible, or determined to be eligible, by the State Historical Resources Commission, for listing in the CRHR (PRC Section 5024.1).
- A resource included in a local register of historical resources, as defined in Section 5020.1(k) of the PRC, or identified as significant in an historical resource resources survey meeting the requirements of Section 5024.1(g) of the PRC.
- Any object, building, structure, site, area, place, record, or manuscript which a lead agency determines to be historically significant or significant in the architectural, engineering, scientific, economic, agricultural, educational, social, political, military, or cultural annals of California, provided the lead agency's determination is supported by substantial evidence in light of the whole record. Generally, a resource shall be considered by the lead agency to be "historically significant" if the resource meets the criteria for listing in the CRHR (PRC Section 5024.1).
- An archaeological site consisting of at least three associated artifacts/ecofacts (within a 40-square-meter area) or a single feature.
- A "traditional cultural property." A site would be considered to possess ethnic significance if it is associated with a burial or cemetery; religious, social, or transitional activities of a discrete ethnic population; an important person or event as defined by a discrete ethnic

population; or the belief system of a discrete ethnic population.

The determination of significance of impacts on historical and unique archaeological resources is based on criteria found in Section 15064.5 of the State CEQA Guidelines. Section 15064.5 clarifies the definition of a substantial adverse change in the significance of a historical resources as *physical demolition, destruction, relocation, or alteration of the resource or its immediate surroundings such that the significance of an historical resources would be materially impaired.*

Analysis

Archaeology

As presented in the *Cultural Resources Inventory Report for the Riverwalk Project*, prepared by Spindrift Archaeological Consulting (October 2017), the records search results indicated that 393 previous cultural resources studies have been conducted within a one-mile radius of the Specific Plan area, and 141 cultural resources have previously been recorded within a one-mile radius of the Specific Plan area. The previous studies were conducted between 1974 and 2014.

Eleven archaeological sites and one prehistoric were identified within the project APE (See Table 5.6-1, *Summary of Archaeological Sites*.) Sites SDI-11767 and SDI-12220 were evaluated and recommended eligible for listing in the National Register of Historic Places (NRHP) and significant under CEQA and City of San Diego guidelines. A data recovery was later conducted at SDI-11767 to mitigate impacts to the site in association with the Mission Valley West Light Rail Transit (LRT) project. Site SDI-12126 was tested and determined significant under City of San Diego guidelines and CEQA criteria. Sites SDI-11722/H, SDI-11766/H, SDI-12127, SDI-12128, SDI-12129, SDI-12132, and SDI-12862 were all tested and identified as not significant cultural resources under City of San Diego guidelines and CEQA criteria. The isolate (P-31-014936) was a quartzite flake tool and has been collected. Isolates are considered de facto not significant and no further archaeological work is required for that resource. Based on available records, SDI-4675 has not been evaluated, but only a portion of the site intersects the project area and would not be impacted as it is in an open space area. (See Table 5.6-1, *Summary of Archaeological Sites*.)

Table 5.6-1. Summary of Archaeological Sites

Site	Site Type	Area Intersecting Project Area (m ²)	Evaluation Status	Summation
SDI-14963	Isolate quartzite flake tool (collected)	0	Isolates are not considered significant under CEQA	No further work
SDI-4675	Lithic scatter	381.9	Tested, not significant under CEQA	No further work
SDI-11722/H	Prehistoric temporary camp and historic trash scatter	2,110.9	Tested, not significant under CEQA	Monitoring
SDI-11766/H	Lithic and shell scatter and historic refuse scatter	2,162.2	Tested, not significant under CEQA	Monitoring
SDI-12127	Shell scatter	1,394.5	Tested, not significant under CEQA	Monitoring
SDI-12128	Shell midden	3,655	Tested as part of SDI-11767, not a contributing element to the significance of SDI-11767 under CEQA	Monitoring
SDI-12129	Shell scatter	312.2	Tested, not significant under CEQA	Monitoring
SDI-12132	Shell scatter	5,413.7	Tested, not significant under CEQA	Monitoring
SDI-12862	Shell scatter	1,670.6	Tested, not significant under CEQA	Monitoring
SDI-11767	Habitation site with burials	55,251.6	Evaluated, recommended eligible for NRHP and considered significant under CEQA	Monitoring of remedial grading of fill. Data recovery of areas not previously subjected to data recovery prior to grading beneath fill.
SDI-12220	Habitation site or temporary camp (1991); downgraded to shell scatter (1992)	312.3	Evaluated, recommended eligible for NRHP and considered significant under CEQA	Monitoring of remedial grading of fill. Data recovery prior to grading beneath fill.
SDI-12126	Shell scatter	3173.1	Tested, considered significant under CEQA	Monitoring of remedial grading of fill. Data recovery prior to grading beneath fill.

As mentioned above sites SDI-11767 and SDI-12220 and SDI-12126 have been evaluated and determined to be significant. These sites are in an area that would require grading and impacted by the project. Site SDI-11767 is predominately covered by approximately two to four feet of fill as identified on a historic cut/fill map for the realignment of the Stardust Golf Course. SDI-12126 is located directly within the footprint of a proposed building and would also be impacted.

Sites SDI-11722/H, SDI-11766/H, SDI-12128, SDI-12132, and SDI-12862 have all been evaluated and were identified as not significant pursuant to City of San Diego and CEQA guidelines. However, they are still within the project APE and intersect proposed building footprints. These sites would likely be directly impacted during remedial grading but are not considered significant.

Sites SDI-4675, SDI-12127, and SDI-12129 are in areas designated as open space and would not be impacted by the proposed project. SDI-4675 has not yet been evaluated. SDI-12127, and SDI-12129 have been evaluated and have been identified as not significant.

As the project would result in direct impacts to the three significant archaeological sites (SDI-11767, SDI-12220, and SDI-12126), a significant impact would occur. However, the direct impacts would be mitigated through the implementation of a *Mitigation Monitoring and Reporting Program* presented in Chapter 11.0 of this EIR. The MMRP would include the requirements for archaeological and Native American monitoring as well as an Archaeological Research Data Recovery Program (ARDRP). (The *Archaeological Research and Data Recovery Program for the Riverwalk Redevelopment Project* is included as Appendix X.)

Given that the significant archaeological sites, SDI-11767, SDI-12220, and SDI-12126, are located beneath an indeterminate amount of fill, controlled excavation of cap fill soil would occur under supervision of archaeological and Native American monitors prior to the ARDRP implementation. Monitors would ensure that removal of the fill and cap do not disturb any buried cultural deposits beneath. Additionally, full-time archaeological and Native American monitoring is recommended during all soil disturbing and grading/excavation/trenching activities that could result in impacts to known or previously unidentified archaeological resources.

Built Environment

Based on the documentation and evaluation of Riverwalk conducted as part of the Historic Resources Technical Report prepared for the project (ASM 2019) for the Riverwalk Golf Course and careful consideration of its ability to reflect the historic contexts with which it is associated, the golf course and the four buildings individually evaluated were recommended not eligible for two potential periods of significance of 1947-1968 and 1998-2018 under the themes of Recreation and Architecture for NRHP Criteria A and C, CRHR Criteria 1 and 3, and San Diego Register Criteria A, C, and D. The golf course and the four individually evaluated buildings were determined to be ineligible for designation under National, State, or Local criteria and should not be considered historical resources for the purposes of CEQA compliance.

Significance of Impacts

Archaeology

Three significant archaeological sites have been recorded on the site and the project has the potential to impact those sites through grading and construction. Impacts to historical resources would be potentially significant.

Built Environment

The Riverwalk Golf Course and the four individually evaluated buildings are recommended not eligible for the National, State, or local registers and should not be considered historical resources for the purposes of CEQA compliance. Therefore, no potentially significant structures are present on the property. No impact would result to the built environment.

Mitigation Measures

MM 5.6-1: Historical Resources Archaeological Data Recovery Program

1. Prior to issuance of 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 Owner/Permittee shall ensure that the following mitigation measures are outline verbatim on appropriate construction plans.
2. The project requires implementation of an Archaeological Data Recovery Program (ADRP) to mitigate impacts to archaeological site (SDI-11767, SDI-12220, and SDI-12126) prior to the issuance of ANY construction permits or the start of ANY construction if no permits are required. The ADRP with Native American participation consists of a Statistical Sample and shall be implemented as described below after consultation with DSD ED in accordance with the Cultural Resources Report prepared by (*Riverwalk Redevelopment Project Archaeological Research and Data Recovery Program* (ASM Affiliates Inc., February 2020)).
 - a. A sampling strategy shall be conducted in accordance with the Methods Section of the *Riverwalk Redevelopment Project Archaeological Research and Data Recovery Program* (ASM Affiliates Inc., February 2020). Additional test units can be added in consultation with DSD EAS, project archaeologist, and Native American Monitor.
 - b. Laboratory Analysis in the form of specialized studies shall be conducted in accordance with the ADRP.
 - c. Curation of all materials recovered during the ADRP with the exception of human remains and any associated burial goods, shall be prepared in compliance local, state and federal standards and be permanently curated at an approved facility that meets City standards.
 - d. ADRP provision for the discovery of human remains shall be invoked in accordance with the California Public Resources Code, the Health and Safety Code. In the event human remains are encountered during the ADRP, soil shall only be exported from the project

- site after it has been cleared by the Most Likely Descendant (MLD) and the Project Archaeologist.
- e. Archaeological and Native American Monitoring shall be conducted during the remaining grading activities after completion of the ADRP and acceptance of a draft progress report for the program. The detailed Mitigation Monitoring and Reporting Program is identified in below.
 - f. Upon completion of the ADRP and prior to issuance of grading permits, the qualified archaeologist and Native American Monitor shall attend a second preconstruction meeting to make comments and/or suggestions concerning the proposed grading process.

Discovery of Human Remains During Data Recovery

- A. The Archaeological Data Recovery Plan (ADRP) provisions for the discovery of human remains shall be invoked in accordance with the California Public Resources Code and the Health and Safety Code. In the event that human remains are encountered during the ADRP, soil shall only be exported from the project site after it has been cleared by the MLD and the project archaeologist. Any potential human remains recovered during the ADRP shall be directly repatriated to the MLD or MLD Representative at the location of the discovery.
- B. If the MLD does not make a recommendation within 48 hours of notification, or if the recommendations are not acceptable to the landowner following extended discussions and mediation between the City of San Diego and the MLD, the landowner shall reinter the remains and burial items with appropriate dignity on the property in a location not subject to further subsurface disturbance. The location of reinternment shall be protected by recording the location with the NAHC and the South Coastal Information Center.
 - 1. There shall be no further excavation or disturbance in that portion of the site or any nearby area reasonably suspected to overlie adjacent human remains until the San Diego County Medical Examiner is contacted and the discovery location shall be mapped by the monitoring archaeologist and protected and secured from further disturbance whenever possible.
 - 2. The monitoring archaeologist shall notify the Principal Investigator, the City Mitigation Monitoring Coordinator, and will contact the San Diego County Medical Examiner. The Medical Examiner shall make a determination as to the origins of the human remains.
 - 3. If the remains are recognized as or suspected to be Native American by the Medical Examiner or an authorized representative, the Medical Examiner shall contact the California Native American Heritage Commission (NAHC) within 24 hours of the discovery.
 - 4. The NAHC designates and contacts the Most Likely Descendant (MLD).
 - 5. The MLD shall make a recommendation for treatment of the remains and associated burial items within 48 hours of notification. Possible options for treatment may

include:

- a. Preservation in place and avoidance.
 - b. Reburial of the remains on the property in an area to remain undisturbed by the landowner
 - c. Transport of the remains off-site.
6. The landowner shall discuss with the Most Likely Descendant all reasonable options regarding the descendant's preferences for the treatment of human remains and any associated grave goods, as provided in PRC Section 5097.98.
 7. ADRP provisions for the discovery of human remains shall be invoked in accordance with the California PRC and the Health and Safety Code. In the event that human remains are encountered during the ADRP, soil shall only be exported from the project site after it has been cleared by the MLD and the project archaeologist. Any potential human remains recovered during the ADRP shall be directly repatriated to the MLD or MLD Representative at the location of the discovery.

MM 5.6-2: Historical Resources (Archaeological and Native American Monitoring)

I. Prior to Permit Issuance

A. Entitlements Plan Check

1. Prior to issuance of any construction permits, including but not limited to, the first Grading Permit, Demolition Plans/Permits and Building Plans/Permits or a Notice to Proceed for Subdivisions, 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 applicable construction documents through the plan check process.

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 meet the qualifications established in the HRG.
3. Prior to the start of work, the applicant must obtain written 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 Coastal 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, Native American consultant/monitor (where Native American resources may be impacted), 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) (with verification that the AME has been reviewed and approved by the Native American consultant/monitor when Native American resources may be impacted) 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 all soil disturbing and grading/excavation/trenching activities which could result in impacts to archaeological resources as identified on the AME. The Construction Manager is responsible for notifying the RE, PI, and MMC of changes to any construction

activities such as in the case of a potential safety concern within the area being monitored. In certain circumstances OSHA safety requirements may necessitate modification of the AME.

2. The Native American consultant/monitor shall determine the extent of their presence during soil disturbing and grading/excavation/trenching activities based on the AME and provide that information to the PI and MMC. If prehistoric resources are encountered during the Native American consultant/monitor's absence, work shall stop and the Discovery Notification Process detailed in Section III.B-C and IV.A-D shall commence.
 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 that may reduce or increase the potential for resources to be present.
 4. The archaeological and Native American consultant/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.
- B. Discovery Notification Process
1. In the event of a discovery, the Archaeological Monitor shall direct the contractor to temporarily divert all soil disturbing activities, including but not limited to digging, trenching, excavating or grading activities in the area of discovery and in the area reasonably suspected to overlay adjacent resources 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.
 4. No soil shall be exported off-site until a determination can be made regarding the significance of the resource specifically if Native American resources are encountered.
- C. Determination of Significance
1. The PI and Native American consultant/monitor, where Native American resources are discovered 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) which has been reviewed by the Native American

consultant/monitor, 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. Note: If a unique archaeological site is also an historical resource as defined in CEQA, then the limits on the amount(s) that a project applicant may be required to pay to cover mitigation costs as indicated in CEQA Section 21083.2 shall not apply.

- c. If the 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 no soil shall be exported off-site until a determination can be made regarding the provenance of the human remains; and the following procedures as set forth in CEQA Section 15064.5(e), 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) of the Development Services Department to assist with the discovery notification process.
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 provenance of the remains.
2. The Medical Examiner, in consultation with the PI, will determine the need for a field examination to determine the provenance.
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 CEQA Section 15064.5(e), the California Public Resources 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 will be determined between the MLD and the PI, and, if:
 - a. The NAHC is unable to identify the MLD, OR the MLD failed to make a recommendation within 48 hours after being granted access to the site, 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, the landowner shall reinter the human remains and items associated with Native American human remains with appropriate dignity on the property in a location not subject to further and future subsurface disturbance, THEN
 - c. 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; or
 - (3) Record a document with the County. The document shall be titled "Notice of Reinternment of Native American Remains" and shall include a legal description of the property, the name of the property owner, and the owner's acknowledged signature, in addition to any other information required by PRC 5097.98. The document shall be indexed as a notice under the name of the owner.

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 CSV 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. Discovery of human remains shall always be treated as a significant discovery.
 - c. Potentially Significant Discoveries
If the PI determines that a potentially significant discovery has been made, the procedures detailed under Section III - During Construction and IV-Discovery of Human Remains 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. It should be noted that if the PI is unable to submit the Draft Monitoring Report within the allotted 90-day timeframe resulting from delays with analysis, special study results or other complex issues, a schedule shall be submitted to MMC establishing agreed due dates and the provision for submittal of monthly status reports until this measure can be met.
 - 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.
 3. When applicable to the situation, the PI shall include written verification from the Native American consultant/monitor indicating that Native American resources were treated in accordance with state law and/or applicable agreements. If the resources were reinterred, verification shall be provided to show what protective measures were taken to ensure no further disturbance occurs in accordance with Section IV – Discovery of Human Remains, Subsection 5.
- 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.

Significance of Impacts Following Implementation of Mitigation Measures

With implementation of mitigation measure MM 5.6-1 and 5.6-2, impacts to archaeological resources would be reduced to below a level of significance.

5.6.4.2 Issue 2

Issue 2 Would the proposal result in any impact to existing religious or sacred uses within the potential impact area?

Impact Thresholds

- A religious property deriving primary significance from architectural or artistic distinction or historical importance.
- A site associated with a burial or cemetery; religious, social, or traditional activities of a discrete ethnic population; an important person or event as defined by a discrete ethnic population; or the belief system of a discrete ethnic population.

Analysis

The SCIC records search did not identify any existing religious or sacred uses within the project site. Additionally, the NAHC Sacred Lands File did not identify sacred lands within project site. Because of the lack of existing religions or sacred uses, the project would not result in impacts under this

category.

Significance of Impacts

No existing religious or sacred uses are located on the project site. As a result, no impacts to religious or sacred uses would occur.

Mitigation Measures

Mitigation would not be required.

5.6.4.3 Issue 3

Issue 3 Would the proposal result in the disturbance of any human remains, including those interred outside formal cemeteries?

Impact Threshold

- Discovery of human remains shall always be treated as a significant discovery.

Analysis

As previously identified, the project site is located within a high sensitivity level for archaeological resources. Human remains have been recovered during previous investigations at SDI-11767, suggesting the possibility of additional prehistoric inhumations or cremations. Should human remains be discovered during construction of the project, work would be required to halt until a determination could be made regarding the provenance of the human remains via the County Coroner and Native American representative, as required. The project would be required to treat human remains uncovered during construction in accordance with the California Public Resources Code (Sec. 5097.98) and State Health and Safety Code (Sec. 7050.5). Additionally, mitigation measure MM 5.6-1 has specific measures to address the discovery of human remains.

Significance of Impacts

Impacts to human remains are potentially significant.

Mitigation Measures

Implementation of MM 5.6-1 and MM 5.6-2 would be required to mitigate impacts associated with human remains.

Significance of Impacts following Implementation of Mitigation Measures

With implementation of mitigation measures MM 5.6-1 and MM 5.6-2, impacts to human remains would be reduced to below a level of significance.

5.7 Energy

This section provides an evaluation of existing energy production/consumption conditions and potential energy use and related impacts from the project. The following discussion is consistent with and fulfills the intent of CEQA Guidelines Appendix F and is based in part on information obtained from SDG&E *Letters/Responses to Service Providers*, included as Appendix J.

5.7.1 Existing Conditions

SDG&E, a subsidiary of Sempra Energy, provides natural gas and electricity service to the project site. SDG&E provides electrical services to 3.6 million customers through 1.4 million electric meters and 873,000 natural gas meters through the 4,100-square-mile service area in San Diego County and southern Orange County. SDG&E forecasts future natural gas and power consumption demand on a continual basis, primarily for installation of transmission and distribution lines. In situations where projects with large power loads are planned, this is considered together with other loads in the project vicinity, and electrical substations are upgraded as necessary. Direct impacts to electrical and natural gas facilities are addressed and mitigated by SDG&E at the time incoming development projects occur.

The project site has historically been used as a golf course since 1947. Electricity demand associated with existing development is estimated to be 193,500 kilowatt hours (kWh) per year. Natural Gas demand associated with existing development is estimated to be 871,900 thousand British thermal units (kBtu) per year. SDG&E facilities surround the project site within public streets. SDG&E has the capacity to meet the present demand for electrical service, and there are no service deficiencies in the existing distribution system (see Appendix J).

5.7.1.1 Electricity

According to the California Energy Commission's California Energy Consumption Database, California used approximately 282,896 gigawatt hours (2,829 trillion kilowatt hours) of electricity in 2015, which is the most recent year of data available. Electricity usage in California for different land uses varies substantially by the type(s) of uses in a building, type(s) of construction materials used in a building, and the efficiency of all electricity-consuming devices within a building. Due to the State's energy efficiency standards and efficiency and conversion programs, California's per capita electricity use had remained stable for more than 30 years, which the national average has steadily increased.

The State of California produces approximately 82 percent of its electricity and imports the remaining 18 percent. The California Independent System Operator (ISO) governs the transmission of electricity from power plants to utilities. Electricity to San Diego County is transferred via 138 kilo volts (kV) lines at Camp Pendleton, and a 500 kV line near Jacumba. Additionally, there are two

operating power plants within San Diego County: Encina (Cabrillo Power) - 965 megawatt (MW), and the Palomar Energy Power Plant, Escondido (SDG&E) - 550 MW, which began operating in the summer of 2006.

SDG&E receives electric power from a variety of sources. According to the California Public Utilities Commission's 2016 Biennial Renewables Portfolio Standard Program Update, 36.4 percent of SDG&E's power came from eligible renewable sources in 2014, including biomass/waste, geothermal, small hydroelectric, solar, and wind sources. This is an improvement from the 15.7 percent renewable energy portfolio that SDG&E achieved in 2011. Electricity distribution lines in the project area are located underground. Each year, SDG&E allocates capital funds for the purposes of converting overhead electric distribution lines. Under provisions of Rule 20A established by the California Public Utilities commission, the City may designate major streets for undergrounding the overhead lines. In general, all new commercial, industrial, and residential developments are required to accept the underground service.

In addition, a variety of energy conservation programs are provided by SDG&E to City residents and businesses. These programs include:

- Conducting surveys to determine energy use and recommending energy efficiency measures to reduce energy use;
- Providing discounts for retrofitting lighting, refrigeration, and mechanical equipment with energy efficient technologies; and
- Incentives for using energy during non-peak hours to reduce peak-hours demand.

Title 24 of the California Administrative Code sets efficiency standards for new construction, regulating energy consumed for heating, cooling, ventilations, water heating, and lighting. These building efficiency standards are enforced through the City's building permit process.

5.7.1.2 Natural Gas

Natural gas sources for the California include in-state sources (16 percent), Canada (28 percent), the Rockies (10 percent), and the Southwest (46 percent). Gas from outside sources enter the state through large high-pressure gas lines. These transmission lines feed natural gas storage areas located in Orange and northern Los Angeles counties, which serve all of southern California. From these storage facilities, high-pressure gas transmission lines enter San Diego County from the north inland area (Rainbow area). A 30-inch transmission line veers to the coast, and a 16-inch line continues inland.

5.7.1.3 Petroleum

There are more than 27 million registered vehicles in California, and those vehicles consumed an estimated 18.5 billion gallons of petroleum and diesel in 2014, according to the California Energy Commission. Gasoline and other vehicle fuels are commercially provided commodities, and would be available to the project via commercial outlets.

Petroleum accounts for approximately 92 percent of California's transportation energy sources. Technological advances, market trends, consumer behavior, and government policies could result in significant changes to fuel consumption by type and total. At the Federal and State levels, various policies, rules, and regulations have been enacted to improve vehicle fuel efficiency, promote the development and use of alternative fuels, reduce transportation-source air pollutants and GHG emissions, and reduce VMT. Market forces have driven the price of petroleum products steadily upward, and technological advances have made use of other energy resources or alternative transportation modes increasingly feasible.

5.7.2 Regulatory Framework

5.7.2.1 Federal

Federal Energy Regulatory Commission

The Federal Energy Regulatory Commission is an independent agency that regulates the transmission and sales of electricity, natural gas, and oil in interstate commerce, licensing of hydroelectric projects, and oversight of related environmental matters. The setting and enforcing of interstate transmission sales is also regulated by Federal Energy Regulatory Commission.

Federal Energy Policy and Conservation Act

In 1975, Congress enacted the Federal Energy Policy and Conservation Act to serve the nation's energy demands and promote feasibly attainable conservation methods. This act established the first fuel economy standards for on-road motor vehicles in the United States. Pursuant to the act, the National Highway Traffic Safety Administration is responsible for establishing additional vehicle standards. In 2012, new fuel economy standards were approved for model year 2017 passenger cars and light trucks at 54.5 miles per gallon. Fuel economy is determined based on each manufacturer's average fuel economy for the fleet of vehicles available for sale in the United States.

Intermodal Surface Transportation Efficiency Act of 1991

The Intermodal Surface Transportation Efficiency Acts of 1991 (ISTEA) promoted the development of intermodal transportation systems to maximize mobility, as well as address national and local interests in air quality and energy. ISTEA contained factors that metropolitan planning organizations were to address in development transportation plans and programs, including some energy-related factors. To meet the new ISTEA requirements, metropolitan planning organizations adopted explicit

policies defining the social, economic, energy, and environmental values guiding transportation decisions.

Energy Policy Act of 2005

The Energy Policy Act of 2005 addresses energy production in the United States, including (1) energy efficiency; (2) renewable energy; (3) oil and gas; (4) coal; (5) tribal energy; (6) nuclear matters and security; (7) vehicles and motor fuels, including ethanol; (8) hydrogen; (9) electricity; (10) energy tax incentives; (11) hydropower and geothermal energy; and (12) climate change technology. The act includes provisions such as increasing the amount of biofuel that must be mixed with gasoline sold in the United States and loan guarantees for entities that develop or use innovative technologies that avoid the by-production of GHGs.

Energy Independence and Security Act of 2007

On December 19, 2007, the Energy Independence and Security Act of 2007 (EISA) was signed into law. In addition to setting increased Corporate Average Fuel Economy standards for motor vehicles, the EISA includes other provisions related to energy efficiency:

- Renewable Fuel Standard (Section 202)
- Appliance and Lighting Efficiency Standard (Sections 301-325)
- Building Energy Efficiency (Sections 411-441)

This Federal legislation requires ever-increasing levels of renewable fuels – the RFS – to replace petroleum. The EPA is responsible for developing and implementing regulations to ensure that transportation fuel sold in the United States contains a minimum volume of renewable fuel. The RFS program regulations were developed in collaboration with refiners, renewable fuel producers, and many other stakeholders.

The RFS program was created under the Environmental Policy Act of 2005 and established the first renewable fuel volume mandate in the United States. As required under the Act, the original RFS program (RFS1) required 7.5 billion gallons of renewable fuel to be blended into gasoline by 2012. Under the EISA, the RFS program was expanded in several key ways that lay the foundation for achieving significant reductions of GHG emissions from the use of renewable fuels, for reducing imported petroleum, and encouraging the development and expansion of the nation's renewable fuels sector. The updated program is referred to as RFS2 and includes the following:

- EISA expanded the RFS program to include diesel, in addition to gasoline.
- EISA increased the volume of renewable fuel required to be blended into transportation fuel from nine billion gallons in 2008 to 36 billion gallons by 2022.
- EISA established new categories of renewable fuel and set separate volume requirements for each one.

- EISA required the EPA to apply lifecycle GHG performance threshold standards to ensure that each category of renewable fuel emits fewer GHGs than the petroleum fuel it replaces.

Additional provisions of the EISA address energy savings in government and public institutions, promoting research for alternative energy, additional research in carbon capture, international energy programs, and the creation of “green” jobs.

5.7.2.2 State

California Code of Regulations, Title 24, Part 6: California Energy Code

Title 24 of the CCR, *Energy Efficient Standards for Residential and Nonresidential Buildings*, was adopted in 1978 by the California Energy Commission (CEC) in response to a legislative mandate to reduce California’s energy consumption. New buildings in California are required to conform to energy conservation standards specified in Title 24 of the CCR. The standards apply only to residential and non-residential buildings for human occupancy.

Title 24 of the CCR comprises the State Building Standards Code. Part 6 of Title 24 is the California Energy Code, which includes the building energy efficiency standards. The standards include provisions applicable to all buildings, residential and non-residential, describing requirements for documentation and certification that the building meets the standards. These provisions include mandatory requirements for efficiency and design of the following types of systems, equipment, and appliances:

- | | |
|--------------------------------------|---|
| • Air conditioning systems | • Insulation and cool roofs |
| • Heat pumps | • Lighting and control devices |
| • Water chillers | • Windows and exterior doors |
| • Gas- and oil-fired boilers | • Joints and other building structure openings (“envelope”) |
| • Cooling equipment | • Gas-fired equipment including furnaces and stoves/ovens |
| • Water heaters and equipment | |
| • Pool and spa heaters and equipment | |

The standards include additional mandatory requirements for space conditioning (cooling and heating), water heating, and indoor and outdoor lighting systems and equipment in non-residential, high-rise residential, and hotel or motel buildings.

California Code of Regulations, Title 24, Part 11

Title 24, Part 11 of the CCR consists of the CALGreen Building Standards for residential, commercial, and public building construction. The guidelines are intended to reduce the amount of water and sewer service needed to serve future development. Use of recycled water is also encouraged in the standards.

California Energy Plan

The CEC is responsible for preparing the State Energy Plan, which identifies emerging trends related to energy supply, demand, conservation, public health and safety, and the maintenance of a healthy economy. The plan calls for the state to assist in the transformation of the transportation system to improve air quality, reduce congestion, and increase the efficient use of fuel supplies with the fewest environmental and energy costs. To further this policy, the plan identifies a number of strategies, including providing assistance to public agencies and fleet operators.

5.7.2.3 Local

SANDAG Regional Energy Strategy

The Regional Energy Strategy (RES) serves as the energy policy blueprint for the San Diego region through 2050. It established long-term goals in 11 topic areas including energy efficiency, renewable energy, distributed generation, transportation fuels, land use and transportation planning, border energy issues, and the green economy. Using the strategic guiding principles, and taking into consideration the myriad of policy measures recommended across the energy topics, the following six early actions were identified for SANDAG and local governments to focus on in the near term:

1. Pursue a comprehensive building retrofit program to improve efficiency and install renewable energy systems.
2. Create financing programs to pay for projects and improvements that save energy.
3. Utilize the SANDAG-SDG&E Local Government Partnership to help local governments identify opportunities and implement energy savings at government facilities and throughout their communities.
4. Support land use and transportation planning strategies that reduce energy use and GHG emissions.
5. Support planning of electric charging stations and alternative fueling infrastructure.
6. Support use of existing unused reclaimed water to decrease the amount of energy needed to meet the water needs of the San Diego region.

In 2014, a technical update of the RES was completed in order to inform development of San Diego Forward: The Regional Plan. This technical update demonstrates progress toward attaining the RES goals, updates existing conditions and future projects data, and recommends priorities for moving forward. Concurrent with the update, summary reports were prepared for each of the RES goals.

SDG&E Long-Term Resource Plan

In 2004, SDG&E filed a long-term energy resource plan (LTRP) with the CPUC, which identifies how SDG&E will meet the future energy needs of customers in the service area. The LTRP identifies several energy demand reduction (i.e., conservation) targets, as well as goals for increasing renewable energy supplies, new local power generation, and increased transmission capacity.

The LTRP set a standard for acquiring 20 percent of SDG&E's energy mix from renewables by 2010 and 33 percent by 2020. The LTRP also calls for greater use of in-region energy supplies, including renewable energy installations. By 2020, the LTRP states that SDG&E intends to achieve and maintain the capacity to generate 75 percent of summer peak demand with in-county generation. The LTRP also identifies the procurement of 44 percent of its renewables to be generated and distributed in-region by 2020.

General Plan

The City of San Diego adopted an updated General Plan in 2008. The following policies contained in the Conservation Element of the General Plan are applicable to the project:

- CE-A.2. Reduce the City's carbon footprint. Develop and adopt new or amended regulations, programs, and incentives as appropriate to implement the goals and policies set forth in the General Plan to:
 - Create sustainable and efficient land use patterns to reduce vehicular trips and preserve open space;
 - Reduce fuel emission levels by encouraging alternative modes of transportation and increasing fuel efficiency;
 - Improve energy efficiency, especially in the transportation sector and buildings and appliances;
 - Reduce the Urban Heat Island effect through sustainable design and building practices;
 - Reduce waste by improving management and recycling programs.
- CE-A.5. Employ sustainable or "green" building techniques for the construction and operation of buildings.
 - Develop and implement sustainable building standards for new and significant remodels of residential and commercial buildings to maximize energy efficiency, and to achieve overall net zero energy consumption by 2020 for new residential buildings and 2030 for new commercial buildings.

Climate Action Plan

The City of San Diego adopted a CAP in December 2015 (City of San Diego 2015). The CAP quantifies GHG emissions, establishes citywide reduction targets for 2020 and 2035, identifies strategies and measures to reduce GHG levels, and provides guidance for monitoring progress on an annual basis. The City of San Diego CAP identifies a comprehensive set of goals and actions, including ordinances, policies, resolutions, programs, and incentives, that the City can use to reduce GHG emissions.

5.7.3 Impact Analysis

5.7.3.1 Issue 1

Issue 1 Would the project result in a potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation?

Impact Threshold:

Consistent with CEQA Guidelines Appendix G, a project could result in a significant impact to energy if it would:

- *Result in a potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation.*

Analysis

Pursuant to State CEQA Guidelines Appendix F, energy conservation impacts were analyzed by estimating project energy requirements by amount and type, then evaluating project compliance with regulatory requirements. These data were used to evaluate the project's effects on energy resources and the degree to which the project would comply with existing energy standards.

The analysis included in this section utilizes the CalEEMod Version 2016.3.2 results from the project's air quality analysis to evaluate energy impacts (refer to Appendix F, *Air Quality Study*, of this EIR).

Electricity

Construction

Temporary electrical power for as-necessary lighting and electronic equipment, such as computers inside temporary construction trailers, would be provided by SDG&E. The amount of electricity used during construction would be minimal because typical demand stems from the use of several construction trailers that are used by managerial staff during the hours of construction activities in addition to electrically-powered hand tools. Most energy used during construction would be from petroleum. The electricity used for such activities would be temporary and negligible.

Operation

SDG&E has indicated that the current energy system would be sufficient to service the project, and that SDG&E would serve the project. A letter from SDG&E states gas and electric services can be made available for the project (see Appendix J). No adverse effects to non-renewable energy resources are anticipated with development of the project site as proposed by the project. Furthermore, the project would not result in the use of excessive amounts of electricity and would not result in the need to develop additional sources of energy.

The California Energy Commission reported SDG&E electrical demand for residential uses in 2016 was 6,692.28 million kWh. The project would generate the demand for approximately 10,060,490 kWh of electricity use for Phase I of the project, 9,736,316 kWh for Phase II, and 12,925,616 kWh for Phase III. This equals approximately 0.1 percent of the total energy demand reported by SDG&E for residential uses in 2016. Electricity use at the project would not be excessive, would be commensurate with the proposed use, and would not result in a substantial increase in consumption. Additionally, the project would not cause large amounts of electricity to be used in a manner that is wasteful or otherwise inconsistent with adopted plans or policies. The project would adhere to Title 24 requirements and the CAP and would incorporate several measures directed at minimizing energy use. These include:

- High-efficiency windows and kitchen appliances
- Energy Efficient Air Conditioning and Heating
- 3rd Party Performance Testing and Inspections of Design and Equipment
- Energy Efficient LED Lighting
- Programmable Thermostats
- Electric Vehicle charging stations

Natural Gas

Construction

Natural gas is not anticipated to be required during construction of the project. Fuels used for construction would primarily consist of diesel and gasoline, which are discussed under the “petroleum” subsection, below. Any minor amounts of natural gas that may be consumed as a result of project construction would be temporary and negligible and would not have an adverse effect.

Operation

Natural gas would be directly consumed throughout the operation of the project, primarily through building heating, water heating, and cooking. Natural gas consumption was estimated for each of the project’s land uses based on the CalEEMod default values, and the California Energy Commission reported natural gas demand in 2016 for SDG&E to be 269 million therms. Based on these calculations, the project is estimated to consume approximately 16,536,969 kBTU of natural gas per year during operation during Phase I, 17,783,913 kBTU consumption for Phase II, and 18,941,478 kBTU consumption for Phase III. This represents approximately 0.19 percent of total consumption of natural gas by SDG&E for residential uses in 2016.

As such, the project’s long-term increase in demand for natural gas would be commensurate with the proposed use, would not be substantial, and would not cause the use of large amounts of natural gas in a manner that is wasteful or otherwise inconsistent with adopted plans or policies. However, the project would be designed to comply with Title 24, Part 6, of the CCR, as well as the CAP.

Due to the size and scale of the project, natural gas consumption would be appropriate and not place a significant burden on SDG&E's services. energy consumption relative to electricity and natural gas use would not be considered excessive, inefficient, or unnecessary.

Petroleum

Construction

Petroleum would be consumed throughout construction of the project. Fuel consumed by construction equipment would be the primarily energy resource expended over the course of construction, while VMT associated with the transportation of construction materials and construction worker commutes would also result in petroleum consumption. Heavy-duty equipment used for project construction would rely on diesel fuel, as would haul trucks involved in off-hauling materials from demolition and excavation. Construction workers would travel to and from the project site throughout the duration of construction. It is assumed that construction workers would travel to and from the project site in gasoline-powered passenger vehicles. There are no unusual project characteristics or construction processes that would require the use of equipment that would be more energy intensive than is used for comparable activities or use of equipment that would not conform to current emissions standards (and related fuel efficiencies).

Heavy-duty construction equipment of various types would be used during each phase of construction. CalEEMod was used to estimate construction equipment usage. Fuel consumption from construction equipment was estimated by converting the total CO₂ emissions from each construction phase to gallons using the conversion factors shown in the tables included below. Table 5.7-1, *Construction Worker Gasoline Demand by Phase*, illustrates the demand of gasoline for construction worker trips to and from the site for the various construction phases. Construction worker demand equals a total of 306,122 gallons of gasoline for Phase I, 476,450 gallons of gasoline for Phase II, and 124,624 gallons of gasoline for Phase III.

Table 5.7-2, *Construction Vendor Diesel Fuel Demand by Phase*, illustrates the demand of diesel fuel for construction vendor trips to and from the site. These trips are associated with the delivery of construction materials during the construction phase. Construction vendor demand equals a total of 198,919 gallons of diesel fuel for Phase I, 474,754 gallons of diesel fuel for Phase II, and 76,522 gallons of diesel fuel for Phase III.

Table 5.7-3, *Construction Equipment Diesel Fuel Demand by Phase*, illustrates the demand of diesel fuel for construction vehicles on-site during the various construction phases. Construction equipment diesel demand equals a total of 93,599 gallons of diesel fuel in Phase I, 108,851 gallons of diesel fuel in Phase II, and 88,604 gallons of diesel fuel in Phase III.

Table 5.7-1. Construction Worker Gasoline Demand by Phase

Phase I			
Phase I – 2023	CO ₂ E MT	Kg CO ₂ E	Gallons
<i>Demolition</i>	2.4	2,400	171
<i>Site Preparation</i>	1.7	1,700	192
<i>Grading</i>	4.8	4,800	541
<i>Building Construction</i>	517	517,000	58,286
Phase I – 2024	CO ₂ E MT	Kg CO ₂ E	Gallons
<i>Building Construction</i>	1,241	1,241,000	139,910
Phase I – 2025	CO ₂ E MT	Kg CO ₂ E	Gallons
<i>Building Construction</i>	891	891,000	100,450
<i>Paving</i>	2.4	2,400	271
<i>Arch. Coating</i>	55	55,000	6,201
TOTAL			306,122
Phase II			
Phase II – 2028	CO ₂ E MT	Kg CO ₂ E	Gallons
<i>Demolition</i>	2.4	2,400	271
<i>Site Preparation</i>	2.9	2,900	327
<i>Grading</i>	6.4	6,400	722
<i>Building Construction</i>	181	181,000	20,406
Phase II – 2029	CO ₂ E MT	Kg CO ₂ E	Gallons
<i>Building Construction</i>	2,184	2,184,000	246,223
Phase II – 2030	CO ₂ E MT	Kg CO ₂ E	Gallons
<i>Building Construction</i>	1,599	1,599,000	180,271
<i>Paving</i>	2.4	2,400	271
<i>Arch. Coating</i>	248	248,000	27,959
TOTAL			476,450
Phase III			
Phase III – 2033	CO ₂ E MT	Kg CO ₂ E	Gallons
<i>Demolition</i>	1.4	1,400	158
<i>Site Preparation</i>	1.7	1,700	192
<i>Grading</i>	4.3	4,300	485
<i>Building Construction</i>	265	265,000	29,876
Phase III – 2034	CO ₂ E MT	Kg CO ₂ E	Gallons
<i>Building Construction</i>	762	762,000	85,908
Phase III – 2035	CO ₂ E MT	Kg CO ₂ E	Gallons
<i>Building Construction</i>	58	58,000	6,539
<i>Paving</i>	0.7	700	79
<i>Arch. Coating</i>	12.3	12,300	1,387
TOTAL			124,624

NOTE: The project would be graded in a phased manner restricted by City rules, regulations, and ordinances; agency limitations; and testing for archaeological/cultural resources; as well as the Regional Water Quality Control Board.

Table 5.7-2. Construction Vendor Diesel Fuel Demand by Phase

Phase I			
Phase I – 2023	CO ₂ E MT	Kg CO ₂ E	Gallons
<i>Building Construction</i>	354	354,000	34,774
Phase I – 2024	CO ₂ E MT	Kg CO ₂ E	Gallons
<i>Building Construction</i>	879	879,000	86,346
Phase I – 2025	CO ₂ E MT	Kg CO ₂ E	Gallons
<i>Building Construction</i>	653	653,000	64,145
<i>Arch. Coating</i>	139	139,000	13,654
TOTAL			198,919
Phase II			
Phase II – 2028	CO ₂ E MT	Kg CO ₂ E	Gallons
<i>Building Construction</i>	214	214,000	21,022
Phase II – 2029	CO ₂ E MT	Kg CO ₂ E	Gallons
<i>Building Construction</i>	2,642	2,642,000	259,528
Phase II – 2030	CO ₂ E MT	Kg CO ₂ E	Gallons
<i>Building Construction</i>	1,977	1,977,000	194,204
TOTAL			474,754
Phase III			
Phase III – 2033	CO ₂ E MT	Kg CO ₂ E	Gallons
<i>Building Construction</i>	190	190,000	18,664
Phase III – 2034	CO ₂ E MT	Kg CO ₂ E	Gallons
<i>Building Construction</i>	547	547,000	53,733
Phase III – 2035	CO ₂ E MT	Kg CO ₂ E	Gallons
<i>Building Construction</i>	42	42,000	4,125
TOTAL			76,522

NOTE: The project would be graded in a phased manner restricted by City rules, regulations, and ordinances; agency limitations; and testing for archaeological/cultural resources; as well as the Regional Water Quality Control Board.

Table 5.7-3. Construction Equipment Diesel Demand by Phase

Phase I			
Phase I – 2023	CO ₂ E MT	Kg CO ₂ E	Gallons
<i>Demolition</i>	86	8,600	845
<i>Site Preparation</i>	52	5,200	511
<i>Grading</i>	206	206,000	20,336
<i>Building Construction</i>	122	122,000	11,984
Phase I – 2024	CO ₂ E MT	Kg CO ₂ E	Gallons
<i>Building Construction</i>	306	306,000	30,060
Phase I – 2025	CO ₂ E MT	Kg CO ₂ E	Gallons
<i>Building Construction</i>	229	229,000	22,495
<i>Paving</i>	55	55,000	5,403
<i>Arch. Coating</i>	20	20,000	1,965
TOTAL			93,599
Phase II			
Phase II – 2028	CO ₂ E MT	Kg CO ₂ E	Gallons
<i>Demolition</i>	103	103,000	10,118
<i>Site Preparation</i>	101	101,000	9,921
<i>Grading</i>	330	330,000	32,417
<i>Building Construction</i>	24	2,400	236
Phase II – 2029	CO ₂ E MT	Kg CO ₂ E	Gallons
<i>Building Construction</i>	304	304,000	29,862
Phase II – 2030	CO ₂ E MT	Kg CO ₂ E	Gallons
<i>Building Construction</i>	258	258,000	25,344
<i>Paving</i>	78	7,800	766
<i>Arch. Coating</i>	19	1,900	187
TOTAL			108,851
Phase III			
Phase III – 2033	CO ₂ E MT	Kg CO ₂ E	Gallons
<i>Demolition</i>	79	7,900	7,760
<i>Site Preparation</i>	80	8,000	786
<i>Grading</i>	295	295,000	28,978
<i>Building Construction</i>	118	118,000	11,591
Phase III – 2034	CO ₂ E MT	Kg CO ₂ E	Gallons
<i>Building Construction</i>	342	342,000	33,595
Phase III – 2035	CO ₂ E MT	Kg CO ₂ E	Gallons
<i>Building Construction</i>	26	26,000	2,554
<i>Paving</i>	24	24,000	2,358
<i>Arch. Coating</i>	10	10,000	982
TOTAL			88,604

NOTE: The project would be graded in a phased manner restricted by City rules, regulations, and ordinances; agency limitations; and testing for archaeological/cultural resources; as well as the Regional Water Quality Control Board.

Petroleum use is necessary to operate construction equipment, and construction equipment would employ Tier 3 engines or higher (and thus would be newer off-road equipment units). Additionally, energy used during construction of the project would be limited to the construction period, and would not involve long-term petroleum use. As such, energy consumption during construction activities would not be considered excessive, inefficient, or unnecessary. Demand for jobs in the project vicinity demonstrates that the proposed construction would not be considered unnecessary.

Operation

In order to estimate petroleum consumption from occupancy of the project, an estimate of VMT was calculated. CalEEMod calculations, the current CARB model used to calculate air quality and GHG emissions, were used to estimate total VMT. Table 5.7-4, *Operational Fuel Demand*, shows the project's estimated VMT and fuel demand over the three phases. CalEEMod assumes 92.5 percent of VMT burns gasoline while the remaining 7.5 percent burn diesel. Thus, of the 16,484 MT (16,484,000 kg) of mobile emissions, 15,247.7 MT is generated by gasoline combustion and 1,236.3 MT from diesel combustion. The project would have a gasoline demand of 1,719,019 gallons and an annual diesel demand of 128,078 gallons.

Table 5.7-4. Operational Fuel Demand

Energy Demand	VMT	MT CO ₂ E	Kilograms CO ₂ E	Gasoline (gallons)	Diesel (gallons)
Phase I	15,887,090	6,098	6,098,000	635,924	51,561
Phase II	14,090,037	4,786	4,786,000	499,104	35,260
Phase III	18,408,876	5,600	5,600,000	583,991	41,257
TOTAL	48,386,003	16,484	16,484,000	1,719,019	128,078

Over the lifetime of the project, the fuel efficiency of vehicles in use is expected to increase, as older vehicles are replaced with newer, more efficient models. Thus, the amount of petroleum consumed as a result of vehicle trips to and from the project site during operation would decrease over time. There are numerous regulations in place that require and/or encourage increased fuel efficiency. For example, CARB has adopted a new approach to passenger vehicles by combining the control for smog-causing pollutants and GHG emissions into a single coordinated package of standards. The new approach also includes efforts to support and accelerate the numbers of plug-in hybrids and zero-emissions vehicles in California. As such, operation of the project is expected to use decreasing amounts of petroleum over time, due to advances in fuel economy.

In summary, although the project would result in an increase in petroleum use during construction and operation compared to the existing conditions, the project would implement measures required under the CAP Checklist regarding VMT reduction through the implementation of a TDM program, as well as provision of a new trolley stop. Additionally, project-specific petroleum use would be expected to diminish over time as fuel efficiency improves and due to the project's walkability and proximity to transit and active transportation networks. Given these considerations, petroleum consumption associated with the project operation would not be considered excessive.

Significance of Impacts

The project would increase demand for energy in the project area and SDG&E's service area. However, no adverse effects on non-renewable resources are anticipated. The project would follow UBC and Title 24 requirements for energy efficiency and would incorporate sustainable design features directed at reducing energy consumption. As such, the project would not result wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation. No significant impacts would result.

Mitigation Measures

Mitigation would not be required.

5.7.3.2 Issue 2

Issue 2 Would the project conflict with or obstruct a state or local plan for renewable energy or energy efficiency?

Impact Threshold

Consistent with CEQA Guidelines Appendix G, a project could result in a significant impact to energy if it would:

- *Conflict with or obstruct a state or local plan for renewable energy or energy efficiency.*

Analysis

The regulatory plans and policies discussed in Section 5.7.2 aim to reduce energy demand; impose emission caps on energy providers; establish minimum building energy and green building standards; transition to renewable non-fossil fuels; incentivize homeowners and builders; fully recover landfill gas for energy; and expand research and development. In accordance with CARB's Scoping Plan, the Specific Plan includes sustainable building practices, designing buildings to reduce heat gain, and promoting solar access. Additionally, the project is required to include all mandatory green building measures under CALGreen, as specified in the CAP Consistency Checklist prepared for the project (see Appendix C). Therefore, the project would be consistent with the Scoping Plan measures through incorporation of stricter building and appliance standards. The project would be consistent with the goals of SANDAG's San Diego Forward: the Regional Plan as it would develop a mixed-use, compact, walkable, and bicycle-friendly communities close to transit connections and consistent with smart growth principles. The project would also improve transit for the community and City with the construction of a new Green Line Trolley stop.

The project would support the type of mixed-use development envisioned by the General Plan City of Villages strategy. The project is consistent with General Plan concepts such as increased walkability, enhanced pedestrian and bicycle networks, and improved connections to transit. The project is consistent with the General Plan's Mobility Element and the City of Villages strategy and

results in development at densities that would support nearby transit and promote transit use. The project also promotes walkability and connectivity through the construction a pedestrian-scaled streetscape environment, promoting internal walkability as well as connectivity, and provides bicycle facilities that support continuous and safe bicycle facilities. As demonstrated in Section 5.2, *Transportation and Circulation*, the promotes an effective land use that reduces VMT and would improve alternative transportation. The project would result in greater transit opportunities and a reduction in VMT and associated energy consumption. The project would implement a Waste Management Plan directed at diverting solid waste, supporting the use of recycled materials, and promoting on-site recycling in accordance with Citywide ordinances.

As presented in Section 5.9, *Greenhouse Gas Emissions*, the project is consistent with the CAP. through implementation of the project's CAP Consistently Checklist strategies, including sustainable development and green building practices. As established by the project's CAP Consistency Checklist, the project would implement CAP strategies relative to *Energy & Water Efficient Buildings* and *Clean & Renewable Energy*.

Thus, the project would not conflict with or obstruct a State or local plan for renewable energy or energy efficiency. No significant adverse environmental effects would result from the adoption of the project in terms of plan consistency or conflicts.

Significance of Impacts

The project the project would not conflict with or obstruct a State or local plan for renewable energy or energy efficiency. No significant adverse environmental effects would result from the adoption of the project in terms of plan consistency or conflicts.

Mitigation Measures

Mitigation would not be required.

5.8 Noise

This section evaluates potential noise impacts associated with the project. The following discussion is based on the *Noise Study* prepared by Birdseye Planning Group (March 2020) and included as Appendix K. For analysis related to land use-based impacts associated with the Noise Element of the General Plan, refer to Section 5.1, *Land Use*.

5.8.1 Existing Conditions

Existing noise sources in the project area are dominated by vehicular noise from motor vehicles (e.g., automobiles, trucks, and buses) on I-8, Fashion Valley Road, Hotel Circle North, and Friars Road. Additional noise sources are associated with transit operations in the project area, including the Green Line trolley and MTS buses. The Green Line Trolley traverses the project site, connecting downtown San Diego and Santee on 15-minute headways in both directions. MTS bus stops are located along the project frontage on Hotel Circle North, Fashion Valley Road and Friars Road. Generally, the bus routes within the project vicinity operate every 10 to 15 minutes on weekdays and weekends. Both vehicular noise and noise from transit operations create noise levels in the project area that affect existing and future urban development, as well as sensitive biological resources associated with habitats along the San Diego River corridor.

5.8.1.1 Overview of Sound Measurement

Noise level (or volume) is generally measured in dB (decibels) using the dBA. The A-weighting scale is an adjustment to the actual sound pressure levels to be consistent with that of human hearing response, which is most sensitive to frequencies around 4,000 Hertz (about the highest note on a piano) and less sensitive to low frequencies (below 100 Hertz). Sound pressure level is measured on a logarithmic scale with the zero-dB level based on the lowest detectable sound pressure level that people can perceive (an audible sound that is not zero sound pressure level). Based on the logarithmic scale, a doubling of sound energy is equivalent to an increase of three dBA, and a sound that is 10 dBA less than the ambient sound level has no effect on ambient noise. Because of the nature of the human ear, a sound must be about 10 dBA greater than the reference sound to be judged as twice as loud. In general, a three dBA change in community noise levels is noticeable, while one to two dB changes generally are not perceived. Quiet suburban areas typically have noise levels in the range of 40 to 50 dBA, while arterial streets are in the 50 to 60+ dBA range. Normal conversational levels are in the 60 to 65 dBA range, and ambient noise levels greater than 65 dBA can interrupt conversations.

Noise levels typically attenuate (or drop off) at a rate of six dBA per doubling of distance from point sources (i.e., industrial machinery). Noise from lightly traveled roads typically attenuates at a rate of about 4.5 dBA per doubling of distance. Noise from heavily traveled roads typically attenuates at about three dBA per doubling of distance. Noise levels may also be reduced by intervening

structures; generally, a single row of buildings between the receptor and the noise source reduces the noise level by about five dBA, while a solid wall or berm reduces noise levels by five to 10 dBA. The manner in which older homes in California were constructed (approximately 30 years old or older) generally provides a reduction of exterior-to-interior noise levels of about 20 to 25 dBA with closed windows. The exterior-to-interior reduction of newer residential units and office buildings construction to California Energy Code standards is generally 30 dBA or more.

In addition to the actual instantaneous measurement of sound levels, the duration of sound is important since sounds that occur over a long period of time are more likely to be an annoyance or cause direct physical damage or environmental stress. One of the most frequently used noise metrics that considers both duration and sound power level is the equivalent noise level (Leq). The Leq is defined as the single steady A-weighted level that is equivalent to the same amount of energy as that contained in the actual fluctuating levels over a period of time (essentially, the average noise level). Typically, Leq is summed over a one-hour period. The maximum noise level (Lmax) is the highest RMS (root mean squared) sound pressure level within the measuring period, and the minimum noise level (Lmin) is the lowest RMS sound pressure level within the measuring period.

The time period in which noise occurs is also important since noise that occurs at night tends to be more disturbing than that which occurs during the day. Community noise is usually measured using Day-Night Average Level (Ldn), which is the 24-hour average noise level with a 10-dBA penalty for noise occurring during nighttime (10 p.m. to 7 a.m.) hours, or CNEL, which is the 24-hour average noise level with a five dBA penalty for noise occurring from 7 p.m. to 10 p.m. and a 10 dBA penalty for noise occurring from 10 p.m. to 7 a.m. Noise levels described by Ldn and CNEL usually do not differ by more than one dB. Daytime Leq levels are louder than Ldn or CNEL levels; thus, if the Leq meets noise standards, the Ldn and CNEL are also met. Table 5.8-1, *Sound Levels of Typical Noise Sources and Noise Environments* shows sound levels of typical noise sources in Leq.

5.8.1.2 Sensitive Receptors

Noise exposure goals for various types of land uses reflect the varying noise sensitivities associated with each of these uses. Urban areas contain a variety of land use and development types that are noise sensitive. Land uses considered to be sensitive receptors include residential, school, childcare centers, acute care hospitals, and long-term health care facilities. Sensitive receptors are determined based upon special factors which may include the age of the users or occupants, the frequency and duration of the use or occupancy, continued exposure to hazardous substances as defined by Federal and State regulations, and the user's ability to evacuate a specific site in the event of a hazardous incident. Existing nearby sensitive receptors include the Presidio View Apartments located along the southern project boundary, various multi-family residences located along Friars Road north of the site, and The Courtyards multi-family residential building located at the northwest corner of the site. Future residential development would occur as part of the mixed-use redevelopment of the Town and Country Hotel site, located east of the project site. The project

would include sensitive receptors at completion, as residential uses would be allowed in all planning Districts.

Table 5.8-1. Sound Levels of Typical Noise Sources and Noise Environments

Noise Source (at Given Distance)	Noise Environment	A-Weighted Sound Level	Human Judgment of Noise Loudness (Relative to Reference Loudness of 70 Decibels*)
Military Jet Takeoff with Afterburner (50 ft)	Carrier Flight Deck	140 Decibels	128 times as loud
Civil Defense Siren (100 ft)		130	64 times as loud
Commercial Jet Take-off (200 ft)		120	32 times as loud Threshold of Pain
Pile Driver (50 ft)	Rock Music Concert Inside Subway Station (New York)	110	16 times as loud
Ambulance Siren (100 ft) Newspaper Press (5 ft) Gas Lawn Mower (3 ft)		100	8 times as loud Very Loud
Food Blender (3 ft) Propeller Plane Flyover (1,000 ft) Diesel Truck (150 ft)	Boiler Room Printing Press Plant	90	4 times as loud
Garbage Disposal (3 ft)	Noisy Urban Daytime	80	2 times as loud
Passenger Car, 65 mph (25 ft) Living Room Stereo (15 ft) Vacuum Cleaner (10 ft)	Commercial Areas	70	Reference Loudness Moderately Loud
Normal Speech (5 ft) Air Conditioning Unit (100 ft)	Data Processing Center Department Store	60	1/2 as loud
Light Traffic (100 ft)	Large Business Office Quiet Urban Daytime	50	1/4 as loud
Bird Calls (distant)	Quiet Urban Nighttime	40	1/8 as loud Quiet
Soft Whisper (5 ft)	Library and Bedroom at Night Quiet Rural Nighttime	30	1/16 as loud
	Broadcast and Recording Studio	20	1/32 as loud Just Audible
		0	1/64 as loud Threshold of Hearing

Source: Compiled by dBf Associates, Inc., 2016

Construction noise can also affect biological resources, particularly during nesting season for avian species. Special-status species are plant and wildlife species that are protected or recognized as sensitive resources by Federal, State, or local resource agencies or organizations. Special-status

species typically have relatively limited distribution and may require specialized habitat conditions. Special-status bird species (including the light-footed Ridgeway's rail, least Bell's vireo, and willow flycatcher) have been observed and/or have moderate to high potential to occur within the sensitive MHPA, which bisects the project site east/west. For this reason, nesting bird species are considered noise-sensitive resources.

5.8.1.3 Noise Monitoring

To gather data on the general noise environment at the project site, four weekday morning 15-minute noise measurements were taken on May 14, 2019, and March 3, 2020. Site 1 was located along Fashion Valley Road adjacent to the Riverwalk Golf Course driving range parking lot mid-way between Friars Road and Hotel Circle North. Site 2 was located at the northeast corner of the Friars Road and Via Las Cumbres intersection. Site 3 was located at the Center Pointe Apartments along the north side of Friars Road west of Fashion Valley Road. Site 4 was located in the common area of the commercial building located at 1650 Hotel Circle North. Site 5 is located along the western property boundary in proximity to the San Diego River corridor. Two five-minute spot measurements were taken at the southern project property line north of the building at 1650 Hotel Circle North and in the parking lot of the Riverwalk Golf Course near the existing clubhouse. An additional measurement was taken on March 3, 2020 at the southeast corner of The Courtyards complex along the western site boundary. Monitoring locations are shown in Figure 5.8-2, *Noise Monitoring Locations*, and are intended to represent baseline conditions at the project site, as well as noise-sensitive uses located in proximity to the site. The measurements were taken using an ANSI Type II integrating sound level meter. The predominant noise source was traffic. The temperature during monitoring was 65 degrees Fahrenheit with no cloud cover or perceptible wind.

During monitoring, 143 cars/light trucks, eight medium (two-axles and six wheels) trucks, and one heavy (18-wheel) truck passed Site 1. A total of 256 cars/light trucks, five medium trucks, and one heavy truck passed Site 2. A total of 301 cars/light trucks, zero medium trucks, and zero heavy trucks passed Site 3. A total of 96 cars/light trucks, two medium trucks, and zero heavy trucks passed Site 4. As referenced, spot measurements were taken at three locations to collect representative data at the southern property line and within the project site. These locations are not located in proximity to road corridors; thus, no traffic counts were performed.

Measured noise is representative of noise levels occurring at the project site during a typical daytime scenario. Table 5.8-2, *Noise Monitoring Results* identifies the noise measurement locations and measured noise levels. As shown, the measured Leq was 65.3 dBA at Site 1, 69.3 dBA at Sites 2 and 3, and 73.0 dBA at Site 4. With the exception of Site 1, ambient noise levels currently exceed the 65-dBA standard for residential receivers. As referenced, three spot measurements were taken: one along the southern site boundary (S1), one at the golf course club house (S2), and the third at the southeast corner of the The Courtyards complex located adjacent to the western site boundary. These locations are representative of the San Diego River corridor and conditions within the center of the project site. Baseline noise levels at both locations are 60 dBA.

Table 5.8-2. Noise Monitoring Results

Measurement Location	Primary Noise Source	Sample Time	Leq (dBA)
1. Common are located south of Riverwalk Drive adjacent to golf course driving range	Traffic, bus, and trolley activity	Weekday morning	65.3
2. Northeast of Friars Road and Via Las Cumbres intersection	Traffic	Weekday morning	69.3
3. Centre Pointe Apartments on north side of Friars Road west of Fashion Valley Road	Traffic/Interstate 8	Weekday morning	73.0 ¹
S1. Southern property line north of 1650 Hotel Circle North	Traffic/Interstate 8	Weekday morning	60.0 ²
S2. Riverwalk Golf Course Club House parking lot	Pedestrian activity and trolley operation	Weekday morning	60.2 ³
S3. Adjacent to project site at southeast corner of The Courtyards site – western property boundary	MTS Trolley/distant traffic	Weekday morning	60.6 ⁴

Source: Field visit using ANSI Type II integrating sound level meter.

¹Ambient noise levels dominated by traffic on Interstate 8.

²Commercial buildings screen noise from Interstate 8 along sections of southern property line.

³MTS Trolley operation contributes to background noise levels at this location.

⁴MTS Trolley is the dominant noise source in this location.

5.8.2 Regulatory Framework

5.8.2.1 Federal

Noise

The Federal Noise Control Act (1972) addressed the issue of noise as a threat to human health and welfare. To implement the Federal Noise Control Act, the EPA undertook a number of studies related to community noise in the 1970s. The EPA found that 24-hour averaged noise levels less than 70 dBA would avoid measurable hearing loss, levels of less than 55 dBA outdoors and 45 dBA indoors would prevent activity interference and annoyance.

The U.S. Department of Housing and Urban Development (HUD) published a Noise Guidebook for use in implementing the Department's noise policy. In general, HUD's goal is exterior noise levels that are less than or equal to 55 dBA Ldn. The goal for interior noise levels is 45 dBA Ldn. HUD suggests that attenuation be employed to achieve this level, where feasible, with a special focus on sensitive areas of homes, such as bedrooms.

Vibration

Vibration is a unique form of noise as the energy is transmitted through buildings, structures and the ground whereas audible noise energy is transmitted through the air. Thus, vibration is generally felt rather than heard. The ground motion caused by vibration is measured as peak particle velocity in inches per second (PPV inches/second) and is referenced as vibration decibels (VdB). The vibration

velocity level threshold of perception for humans is approximately 65 VdB (PPV 0.04 inches/second). A vibration velocity of 75 VdB (PPV 0.25 inches/second) is the approximate dividing line between barely perceptible and distinctly perceptible levels.

The Federal Transit Administration's (FTA) Transit Noise and Vibration Impact Assessment Manual (September 2018) and Caltrans, Transportation and Construction Vibration Guidance Manual (September 2013) uses the same thresholds but different descriptors for the purpose of determining vibration impacts: FTA uses VdB, while Caltrans uses PPV. A threshold of 65 VdB (PPV 0.04) is used for buildings where low ambient vibration is essential for interior operations. These buildings include hospitals and recording studios. A threshold of 72 VdB (PPV 0.25) is used for residences and buildings where people normally sleep (i.e., hotels and rest homes); therefore, the threshold used for the purpose of determining vibration impacts associated with the project is 72 VdB (PPV 0.25).

5.8.2.2 State

Title 24 of the CCR establishes standards governing interior noise levels that apply to all new single-family and multi-family residential units in California. These standards require that acoustical studies be performed before construction at building locations where the existing Ldn exceeds 60 dBA. Such acoustical studies are required to establish mitigation measures that will limit maximum Ldn levels to 45 dBA in any habitable room. Although there are no generally applicable interior noise standards pertinent to all uses, many communities in California have adopted an Ldn of 45 as an upper limit on interior noise in all residential units.

5.8.2.3 Local

Municipal Code

Operational Noise

The City's Noise Ordinance is contained in SDMC, Chapter 5, Article 9.5, Noise Abatement and Control. The noise ordinance regulates noise generated by on-site sources associated with project operation, such as HVAC units. The noise limits of the City Noise Ordinance for various land uses by time of day are shown in Table 5.8-3, *City of San Diego Applicable Limits, Property Line Noise Limits by Land Use and Time of Day*. Section 59.5.0701 of the City's Noise Ordinance requires that multi-family dwellings conform to the provisions of Section T25-28 Noise Insulation Standards, of Article 4, Subchapter 1, Chapter 1, Division T25, Part 6, Title 24, California Administrative Code.

**Table 5.8-3. City of San Diego Applicable Limits
Property Line Noise Limits by Land Use and Time of Day**

Land Use	Time of Day	One-Hour Average Sound Level (decibels) ¹
1. Single Family Residential	7 AM to 7 PM	50
	7 PM to 10 PM	45
	10 PM to 7 AM	40
2. Multi-Family Residential (up to a maximum density of 1/2000)	7 AM to 7 PM	55
	7 PM to 10 PM	50
	10 PM to 7 AM	45
3. All other Residential	7 AM to 7 PM	60
	7 PM to 10 PM	55
	10 PM to 7 AM	50
4. Commercial	7 AM to 7 PM	65
	7 PM to 10 PM	60
	10 PM to 7 AM	60
5. Industrial or Agricultural	any time	75

Source: City of San Diego Municipal Code Section 59.5.0401, 2010

¹The 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.

Construction Noise

Section 59.5.0404 of the SDMC limits construction noise to between 7:00 a.m. and 7:00 p.m. from Monday to Saturday, excluding legal holidays, except in the case of an emergency or under other special permit granted by the Noise Abatement and Control Administrator. When allowed, construction noise shall not be “disturbing, excessive, or offensive” unless a permit has been obtained from the City Noise Abatement and Control Administrator. In addition, construction noise is limited to an average sound level of 75 dBA at a residentially zoned property line during the 12-hour period from 7:00 a.m. to 7:00 p.m.

Multi-Species Habitat Conservation Plan

The City of San Diego MSCP Subarea Plan and associated guidelines produced by the U.S. Fish and Wildlife Service requires that noise be limited to a level not to exceed an hourly limit of 60 dBA Leq or the average ambient noise, whichever is greater, at the edge of the MHPA and occupied habitat during the breeding season (i.e., February 1 through September 15) for sensitive species potentially affected by construction and operation of a project.

5.8.3 Impact Analysis

5.8.3.1 Issue 1

Issue 1 *Would the project result or create a significant increase in the existing ambient noise levels which exceed the City’s adopted ordinance or thresholds?*

Impact Threshold

Based on the City's CEQA Significance Determination Threshold, a project would have a potentially significant noise impact if it would result in:

- Exposure of people to noise levels that exceed the City's adopted Noise Ordinance, San Diego Municipal Code, Section 59.5.0404 (i.e., 75db(A) Leq[12-hour]).
- Exposure of people to noise levels that exceed the City's adopted Noise Ordinance, San Diego Municipal Code, Section 59.5.0401 as identified in Table 5.8-3; or,
- Exposure of people to transportation noise levels that exceed the sound level limits as presented in Table K-2 of the City's Significance Determination Thresholds and as identified in Table 5.8-4, *Traffic Noise Significance Thresholds*.

Table 5.8-4. Traffic Noise Significance Thresholds (dBA CNEL)

Structure or Proposed Use That Would Be Impacted By Traffic Noise	Interior Space	Exterior Useable Space ¹
Single-family detached	45 dB	65 dB
Multi-family, schools, libraries, hospitals, daycare, hotels, motels, parks, convalescent homes	Development Services Department (DSD) ensures 45 dB pursuant to Title 24	65 dB
Offices, churches, business, professional use	N/A	70 dB
Commercial, retail, industrial, outdoor spectator sports uses	N/A	75 dB

Source: City of San Diego Traffic Noise Significance Thresholds, 2016

¹If 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.

Analysis

Construction Noise

Construction noise estimates are based upon noise levels reported by the FTA, Office of Planning and Environment, and the distance to nearby sensitive receptors. Reference noise levels established by the FTA were used to estimate noise levels at nearby sensitive receptors based on a standard noise attenuation rate of six dB per doubling of distance (line-of-sight method of sound attenuation).

While a mix of residential and retail commercial uses is anticipated to be focused in the North and Central Districts, with office and non-retail commercial uses concentrated in the South District, the mix of residential, retail commercial, and office and non-retail commercial land uses would be allowed in any of Riverwalk's three developable planning Districts. Fashion Valley Road improvements would occur during implementation of Phases II and III.

Demolition Noise Levels

As part of Phase I (North District) and Phase II (North and Central Districts), demolition of existing road asphalt, parking areas and ancillary outdoor improvements associated with the golf course and

clubhouse would be required. No demolition is anticipated for Phase III (South District). Construction equipment would not operate continuously during a 12-hour workday which, for the purposes of avoiding temporary construction noise impacts, is presumed to occur between 7:00 a.m. and 7:00 p.m. per San Diego Municipal Code Section 59.5.0404. Equipment would be used on an as-needed basis depending on the activity. For example, jackhammers and loaders may be used to break up asphalt areas and load material into trucks for off-site transport. Noise levels from the demolition activities can reach short-term peak levels exceeding of 90 dBA but would be periodic rather than constant. Based on empirical data referenced from other noise studies, the worst case hourly construction noise level was found to be 80.8 dBA Leq at an average distance of 25 feet. The daily 12-hour average was measured to be 76 dBA at a distance of 25 feet. This results from periodic rather than constant use of equipment. Assuming a reference level of 76 dBA at 25 feet and a six dBA decrease per doubling of distance, the average noise level over a 12-hour period would attenuate to below the 75 dBA limit required by the City of San Diego Municipal Code. No significant noise impacts would result from demolition activities.

Temporary Construction Noise Levels

The project proposes construction of a mixed-use neighborhood to include 4,300 multi-family residential dwelling units; adaptive reuse of the existing golf clubhouse into a common amenity; 152,000 square feet of commercial retail space; 1,000,000 square feet of office and non-retail commercial; and approximately 97 acres of developed park, open space, and trails, located generally along the San Diego River within the Park District and separating the North and Central Districts from the South District. The project would include adaptive reuse of the existing golf clubhouse into a community amenity and would add a new MTS Green Line Trolley stop/transit center within the development. The project would be graded in a phased manner restricted by City rules, regulations and ordinances; agency limitations; and testing for archaeological and cultural resources; as well as the RWQCB. Grading activities would occur within the entire project site, including within the 50-foot no use buffer area, to allow for construction of mixed-use development as proposed by the Specific Plan, as well as development of the Riverwalk River Park. Grading would also be required for proposed improvements to Fashion Valley Road, which crosses the MHPA. Three general construction phases have been assumed, with Phase I (North District) being completed in 2025, Phase II (North, Central, and Park District) completed in 2030, and Phase III (South District) completed in 2035. Temporary construction noise impacts would be associated with the operation of heavy construction equipment on existing sensitive receptors located in proximity to the project site. During the construction of Phases II and III, it is assumed that multi-family residences constructed during Phases I and II would be occupied.

Table 5.8-5, *Typical Construction Equipment Noise Levels*, shows the typical noise levels associated with heavy construction equipment. As shown, noise levels associated with the use of heavy equipment at construction sites can range from about 81 to 95 dBA at 25 feet from the source, depending upon the types of equipment in operation at any given time and phase of construction. Construction-related noise varies considerably depending on the location of operating equipment relative to the location of sensitive properties and the number of individual pieces of equipment operating in

proximity to one another.

Table 5.8-5. Typical Construction Equipment Noise Levels

Equipment Onsite	Typical Level (dBA) 25 feet from the source	Typical Level (dBA) 50 feet from the source	Typical Level (dBA) 100 feet from the source
Air Compressor	84	78	64
Backhoe	84	78	64
Bobcat Tractor	84	78	64
Concrete Mixer	85	79	73
Bulldozer	88	82	76
Jack Hammer	95	89	83
Pavement Roller	86	80	74
Street Sweeper	88	82	76
Man Lift	81	75	69
Dump Truck	82	76	70
Compactor	88	82	76
Grader	91	85	79
Paver	95	89	83
Loader	91	85	79

As referenced above, the City of San Diego limits the average sound level from construction noise to 75 decibels at any property zoned residential during the 12-hour period from 7:00 a.m. to 7:00 p.m. Nearby sensitive receptors include the Presidio View Apartments located along the southern project boundary, residential uses that would occur with active redevelopment of the Town and Country Resort Hotel to the east of the project site, and various multi-family residences located along Friars Road north of the site. The Courtyards multi-family residential building is located at the northwest corner of the site; Mission Greens multi-family residential buildings are located at the northeast corner of the site. At the completion of Phase I (North District), the project would include on-site sensitive receptors (residential development). Additionally, Phase II (in the eastern portion of the North District and in the Central District) would include on-site sensitive receptors (residential development and parks). Phase III (South District) has the potential to include sensitive receptors, if future residential uses occur within the South District.

With a few exceptions, the sensitive properties are separated from the project site by four-lane streets (i.e., Fashion Valley Road and Friars Road). Traffic noise would, in part, mask construction noise at existing sensitive receptors. The nearest receptors adjacent to areas that would be graded are located at the northeast corner of the site (i.e., Mission Greens) and adjacent to the western boundary (i.e., The Courtyards). Future sensitive receptors would be included in the Town and Country Hotel site redevelopment, east of the South District. That project includes a mix of urban uses that would include residential. Areas north of and adjacent to the existing MTS trolley line would be developed with a mix of primarily residential and retail commercial uses. Areas south of the MTS trolley would be comprised of both active and passive park uses, as well as improvements to Fashion Valley Road and development of the South district as predominantly office use, with

residential allowed. The overall amount of grading and construction activity needed for park improvements is less than what would be required for areas where structures would be developed.

Based on EPA noise emissions, empirical data, and the amount of equipment needed for construction of the project, worst-case noise levels from the construction equipment would occur during demolition and grading activities. The anticipated equipment used on-site would include a bulldozer, excavator, backhoe/tractor, grader, and trucks. Each project phase would include multiple acres; thus, equipment would likely be dispersed throughout the construction area. Where construction is projected to occur in proximity (i.e., within 100 feet) of existing sensitive properties, noise levels may be audible at these locations.

Construction Noise Levels – Phase I (North District)

Each general phase of construction would disturb multiple acres; thus, equipment would likely be spread out over the construction area. However, if during site preparation and grading, a grader (85 dBA), a backhoe (78 dBA), and a dump truck (82 dBA) were working simultaneously in the center of the site over a 12-hour work day, the 12-hour Leq would be approximately 87 dBA at 50 feet. Noise levels associated with the above construction scenario are shown at varying distances in Table 5.8-6, *Typical Maximum Construction Noise Levels at Various Distances from Project Construction*. The nearest sensitive receptors to the east and west are approximately 50 to 100 feet from the property line. Noise levels at this distance would range from 87 to 81 dBA during active construction. At 250 feet, noise would attenuate to 73 dBA. Noise levels at 500 feet would attenuate to 67 dBA.

Table 5.8-6. Typical Maximum Construction Noise Levels at Various Distances from Project Construction

Distance from Construction	Maximum Noise Level at Receptor (dBA)
25 feet	93
50 feet	87
100 feet	81
250 feet	73
500 feet	67
1,000 feet	61

Construction noise would not be continuous in one location over a 12-hour workday such that the 75-dBA standard would be exceeded. Thus, no significant temporary construction noise impacts to existing residences would occur. However, it is possible that construction equipment and associated noise could periodically exceed 75 dBA at neighboring residential properties without constituting a violation of the 12-hour average threshold, including those located along Friars Road and the northern portion of Fashion Valley Road, adjacent to the North and Central District, as well as residences constructed and occupied as part of the project as phases as being completed. While no significant construction noise impacts would occur, construction activities would include the following best management practices to minimize nuisance level noise to the extent possible:

Construction Equipment. Electrical power shall be used to run air compressors and similar power tools where feasible. Internal combustion engines should be equipped with a muffler of a type recommended by the manufacturer and in good repair. All diesel equipment should be operated with closed engine doors and should be equipped with factory-recommended mufflers. Construction equipment that continues to generate substantial noise at the project boundaries should be shielded with temporary noise barriers, such as barriers that meet a sound transmission class (STC) rating of 25, sound absorptive panels, or sound blankets on individual pieces of construction equipment. Stationary noise-generating equipment, such as generators and compressors, should be located as far as practically possible from the nearest residential property lines.

Neighbor Notification. Provide notification to residential occupants adjacent to the project site at least 24 hours prior to initiation of construction activities that could result in substantial noise levels at outdoor or indoor living areas. This notification should include the anticipated hours and duration of construction and a description of noise reduction measures being implemented at the project site. The notification should include a telephone number for local residents to call to submit complaints associated with construction noise.

Noise Control Plan. Construction contractors shall develop and implement a noise control plan that includes a noise control monitoring program to ensure sustained construction noise levels do not exceed 75 decibels over a 12-hour period at the nearest sensitive receivers. The plan may include the following requirements:

- Contractor shall turn off idling equipment while not being used for operations or after idling for five minutes.
- Contractor shall perform noisier operation during the times least sensitive to receptors.
- All diesel equipment shall be operated with closed engine doors and shall be equipped with factory-recommended mufflers.
- Electrical power shall be used to run air compressors and similar power tools and to power any temporary structures, such as construction trailers or security staff facilities, where practical.

As shown in Table 5.8-6, noise levels at 250 feet or more from the active construction site would attenuate to below the 75-dBA threshold. Construction activities would occur during daytime hours which would minimize sleep disturbance. Thus, construction-related noise impacts would be less than significant.

Construction Noise Levels – Phases II (North, Central, and Park District) and III (South District)

Construction activities occurring during Phases II (North, Central, and Park District) and III (South District) would include residential, MTS trolley infrastructure, retail, and both active and passive recreational features. Construction activities associated with each component constructed as part of

Phases II and III have the potential to generate noise levels similar to those estimated for Phase I (North District). Because multifamily units would be constructed during Phase I (North District) and Phase II (North, Central, and Park District), these units are expected to be occupied during construction of subsequent phases with all properties occupied during construction of Phase III (South District). Multi-family residential units may also be developed as a component of Phase III (South District).

Noise levels at on-site properties would vary depending on the type of activity with the highest noise levels ranging from 93 to 87 dBA at 25 to 50 feet from sensitive properties. Use of heavy equipment and trucks would generate transient noise events associated with minor grading, loading and material delivery. As construction transitions from the use of heavy equipment to hand tools, noise levels would be typical of those occurring within the surrounding environment. The use of heavy equipment south of the MTS trolley tracks for construction of the Riverwalk River Park and open space improvements would be less audible at receivers located north of the tracks, given the distance and screening that would occur from project buildings and masking from roadway noise and trolley operation. Construction of the park uses would be completed prior to construction of Phase III (South District).

As referenced above, construction noise not would be continuous in one location over a 12-hour workday such that the 75-dBA standard would be exceeded. However, it is possible that construction noise could periodically (in compliance with the 12-hour weighted average) exceed 75 dBA at on-site sensitive properties during construction activities. Implementation of the best management practices presented above would minimize temporary construction noise at both on- and off-site sensitive receptors during all phases of construction.

Construction Noise Impacts to MHPA

The Biological Technical Report (Alden Environmental, Inc., February 2020) identified the potential for special-status bird species to occur on the project site and within the MHPA area. All sensitive animal species observed or detected on site utilize wetland/riparian habitats and were observed or detected along the San Diego River. These species include the following:

- Cooper's hawk;
- Clark's marsh wren;
- Willow flycatcher;
- Yellow-breasted chat;
- Double-crested cormorant;
- Yellow warbler;
- Light-footed Ridgway's rail; and
- Western bluebird.

The Riverwalk River Park element of the project includes planting native wetland species to create native habitats adjacent to the San Diego River and the existing wetlands in the southwestern

portion of the project site, which would create additional habitat for avian and other species of wildlife. No active park uses would be allowed in the native areas; thus, direct and adverse impacts to these species are not anticipated.

Construction equipment used for demolition, construction of Fashion Valley Road improvements, vegetation clearing, and earthwork would generate noise levels as high as 87 dBA Leq at 50 feet from the equipment. Noise levels would vary depending on the equipment used and the duration of activity within specific areas. Grading activities could occur up to the MHPA boundary and habitat areas to construct passive park improvements, as well as improvements to Fashion Valley Road. While grading activities could occur adjacent to the MHPA and habitat areas, equipment use would primarily be transient rather than occurring on one location for extended periods of time.

Grading activities during each phase of construction could exceed the City's 60 dBA Leq threshold along the San Diego River corridor where sensitive bird species are known to occur. While work along the corridor would be concentrated during Phase II within the Park District with construction of Riverwalk Park and Fashion Valley Road improvements, construction noise along the corridor would be audible during construction of Phases I, II, and III. Figure 5.8-3, *60 dBA Construction Noise Contours*, shows the approximately 67-dBA construction noise contour when measured from the San Diego River corridor using a reference level of 87 dBA at 50 feet as shown in Table 5.8-6. This contour is depicted because 67 dBA is the approximate point where construction noise would be partially masked by traffic on Friars Road, Fashion Valley Road, Hotel Circle North, and I-8. As noted, noise is expected to be transitory as grading equipment passes throughout this area. Thus, temporary, indirect impacts would occur from construction-generated noise and result in indirect noise impacts to sensitive bird species, breeding habitat, and adjacent foraging habitat.

Vibration

Activities associated with residential, retail, and office facilities do not generate vibration. Thus, this discussion focuses on temporary vibration caused by construction. As referenced, the closest multi-family residences to the site are located to the east and west of the site along Friars Road 50 to 100 feet from the property line. Based on the information presented in Table 5.8-7, *Vibration Source Levels for Construction Equipment*, vibration levels from operation of a loaded truck or bulldozer bobcat/backhoe would attenuate to 87 VdB or less at 25 feet. As discussed above, 95 VdB is the threshold where minor damage can occur in fragile and/or historic buildings. Vibration levels are projected to be under this threshold; thus, structural damage is not expected to occur as a result of construction activities associated with the project.

As referenced, 72 VdB is the vibration threshold for residences and/or buildings where people sleep. Table 5.8-7 shows that construction equipment, with the exception of a small bulldozer, could exceed 72 VdB at varying distances across the site including the construction area along Fashion Valley Road. Construction activities would occur during daytime hours which would minimize sleep disturbance. Construction activities that cause vibration would be temporary; however, they may be perceptible at adjacent receivers. Temporary vibration impacts would be less than significant.

With respect to biological resources occurring along the San Diego River corridor, the approximate 72 VdB contour line is approximately 100 feet from the source. Vibration associated with construction work within approximately 100 feet from nests could be perceived by species within this area. Implementation of the biological mitigation measures outlined in the BTR would reduce overall vibration levels in proximity to sensitive habitat in the San Diego River corridor to below a level of significance.

Table 5.8-7. Vibration Source Levels for Construction Equipment

Equipment	Approximate VdB				
	25 feet	50 feet	60 feet	75 feet	100 feet
Large Bulldozer	87	81	79	77	75
Loaded Trucks	86	80	78	76	74
Jackhammer	79	73	71	69	67
Small Bulldozer	58	52	50	48	46

Operational Noise

Exterior Traffic Noise

Traffic is the primary noise source that would be generated by the project. Existing measured noise levels in the project area exceed the 65 dBA residential standard. The highest measured noise level is 73.0 dBA along Hotel Circle North, south of the project site. Noise in this area is dominated by traffic on I-8. Existing noise levels along Friars Road between Fashion Valley Road and Fresno Street are approximately 69.3 dBA. Whether a significant noise impact would occur is based on whether project traffic, when added to the existing traffic, would cause the Leq to noticeably increase (+3 dBA) or exceed the 65 dBA exterior standard.

Traffic volumes for each of the three phases were obtained from the *Riverwalk Transportation Impact Analysis* prepared by Linscott, Law and Greenspan and Urban Systems Associates, Inc. (March 20, 2020). The three general construction phases were modeled individually with Phase III (South District) reflecting buildout conditions. Traffic-related noise impacts are addressed based on the difference in volumes between existing conditions and the proposed uses.

Evening (PM) peak hour project trips for existing conditions were modeled to determine baseline noise conditions. Project trips at buildout were then added to the baseline trips to determine whether the Leq at neighboring receivers would noticeably change or exceed 65 dBA as a result of project-related traffic. Noise levels were calculated for receivers located within the North, Central, and South Districts and at nearby sensitive receptors. The following receivers are intended to represent conditions at multiple receivers within proximity to these locations:

North and Central Districts/Residential Development Along Friars Road

1. Fashion Terrace Apartments – 6888 Friars Road;
2. Mission Greens Condominiums – 6717 Friars Road;

3. Centre Point Apartments – 6546 Friars Road;
4. The Bluffs Condominiums – 6406 Friars Road;
5. The Courtyards Condominiums – 5805 Friars Road;
6. Project site adjacent to and east of Receiver 5;
7. Project site south of Friars Road/Via Las Cumbres intersection;
8. Project site south of Receiver 4.

South District/Residential Development along Hotel Circle North

9. Towne and Country Hotel – 900 Fashion Valley Road;
10. Handlery Hotel – 938 Hotel Circle Drive North; and
11. Presidio View Apartments – 1436 Hotel Circle Drive.

Sites 6, 7, and 8 represent the location where apartment buildings associated with the project would be constructed. The noise levels reported are those calculated for the units closest to the adjacent roadways and, thus, representing worst-case conditions. Noise levels decrease with distance from the source and from screening associated with first tier structures. As referenced, the spot measurements taken adjacent to the southern property line and within the project site are approximately 60.0 dBA and less than the 65 dBA residential standard. As shown in Table 5.8-8, *Modeled Noise Levels*, the evening peak hour Leq exceeds the 65 dBA standard at all eight receiver locations modeled under baseline conditions.

The highest existing noise level is at Receiver 8, which is located adjacent to and north of I-8. Because existing noise levels exceed the 65 dBA standard at all receivers modeled, to cause a significant noise impact, project related traffic would have to cause the existing Leq at one or more receivers to increase by three or more dBA. As shown in Table 5.8-8, traffic associated with Phase I (North District) of the project would have the greatest effect at Receivers 1, 3, and 5. Receivers 1 and 2 are exposed to traffic noise from both Friars Road and Fashion Valley Road. Receiver 3 is affected by volumes and related speeds on Friars Road west of Via Las Cumbres. However, the increase would round to 3 dBA. Thus, exterior traffic noise impacts would be less than significant under Phase I (North District).

Phase II (North, Central, and Park District) would not add enough traffic to noticeably increase noise levels at the receivers modeled. The largest increase is 0.8 dBA at Receivers 5 and 9, which reflects higher project volumes on Friars Road east of the project and on Fashion Valley Road south of the project. Phase III (South District) improvements would focus traffic on Fashion Valley Road and Hotel Circle North. This is reflected by the slight increase in noise levels at Receivers 9 and 11. Similarly, Phase III (South District) noise levels would change negligibly from Phase II (North, Central, and Park District) at Receiver 9-11.

Table 5.8-8. Modeled Noise Levels

Receiver	Baseline Leq	Exceed Standard?	With Project Leq	dBA Change	Significant Impact
Phase I (North District)					
Site 1	67.9	Yes	71.0	+3.1	No
Site 2	68.3	Yes	70.0	+1.7	No
Site 3	68.7	Yes	71.6	+2.9	No
Site 4	69.6	Yes	70.6	+1.0	No
Site 5	68.9	Yes	71.8	+2.8	No
Site 6	66.7	Yes	67.5	+0.7	No
Site 7	71.0	Yes	71.9	+0.9	No
Site 8	71.5	Yes	72.3	+0.8	No
Site 9	66.7	Yes	72.3	+0.8	No
Site 10	67.9	Yes	69.0	+1.1	No
Site 11	68.0	Yes	69.8	+1.9	No
Phase II (North, Central, and Park District)					
Site 1	71.0	Yes	70.5	-0.5	No
Site 2	70.0	Yes	69.8	-0.2	No
Site 3	71.6	Yes	71.1	-0.5	No
Site 4	70.6	Yes	70.6	+/-0.0	No
Site 5	71.8	Yes	72.6	+0.8	No
Site 6	67.5	Yes	68.3	+0.8	No
Site 7	71.9	Yes	72.6	+/-0.5	No
Site 8	72.3	Yes	73.0	+0.7	No
Site 9	68.6	Yes	69.2	+0.6	No
Site 10	69.0	Yes	69.0	+/-0.0	No
Site 11	69.8	Yes	69.4	-0.5	No
Phase III (South District)					
Site 1	70.5	Yes	70.5	+/-0.0	No
Site 2	69.8	Yes	69.8	+/-0.0	No
Site 3	71.1	Yes	71.1	+/-0.0	No
Site 4	70.6	Yes	70.6	+/-0.0	No
Site 5	72.6	Yes	72.6	+/-0.0	No
Site 6	68.3	Yes	68.4	+0.1	No
Site 7	72.6	Yes	72.4	-0.02	No
Site 8	73.0	Yes	73.1	+0.1	No
Site 9	69.2	Yes	69.2	+/-0.0	No
Site 10	69.0	Yes	69.0	+/-0.0	No
Site 11	69.4	N/A	69.4	+/-0.0	No

Project-related traffic would have the largest noise increase during Phase I (North District) at the receivers located along Friars Road. However, this increase would be less than 3 dBA and, therefore, is not considered a significant impact. Noise levels at receivers south of the site are dominated by traffic on I-8 and Fashion Valley Road; thus, there would be no perceptible increase in noise levels in the South District. Operation of the proposed project would have no adverse impact on sound levels at existing receivers located in proximity to the site or receivers constructed as part of the project that front Friars Road.

Exterior Use Noise

The HVAC system proposed for use on the site has not been specified and noise levels vary depending on the system size. However, it is assumed that multiple HVAC compressor units would be installed on the rooftop or ground level of the proposed buildings located throughout the project. It is presumed that HVAC units would be installed in each building with systems providing heating/cooling for common areas would be installed on rooftops or within enclosures. Exterior HVAC noise levels can be expected to range from 60 to 70 dBA at five feet from the rooftop equipment and ventilation openings. Assuming HVAC units are installed at the center of the rooftop and a reference noise level of 70 dBA, noise would attenuate to 52 dBA at 40 feet from the source. Roof-top HVAC noise would be less than the 65 dBA criteria at the project property line.

It is possible that ground-level HVAC units may be installed. The locations are not identified; however, noise levels are dependent on the size and location of these units relative to existing properties located in proximity to the project and properties developed as part of the project. If necessary, ground-level HVAC systems would be shrouded and ducted to minimize operational noise. It is unlikely that these units would cause the ambient Leq to increase by more than 3 dBA; however, because the location of these units is unknown, a project-specific evaluation cannot be performed. Mitigation measures would be required.

Active/Passive Park Uses

The project would include approximately 97 acres of park, open space, and trails, located generally along the San Diego River within the Park District and separating the North and Central Districts from the South District. The project would implement the San Diego River Park Master Plan, as modified in the Riverwalk Specific Plan, and incorporate and repurpose the existing golf course clubhouse into the project as a community amenity. The project site is within the City's MSCP Subarea Plan area. The City's MSCP Multi-Habitat Planning Area (MHPA) occurs within the central portion of the site along the San Diego River corridor. The Riverwalk River Park would be located north and south of the MHPA and inclusive of the MHPA occurring on the project site. The project includes habitat restoration and enhancement within the MHPA and the San Diego River corridor.

The active park portion of the Riverwalk River Park would encompass 40.19 acres and is located between 50 and 550 feet from the San Diego River corridor and the MHPA. Uses within the active park may include sports fields, picnic areas, fenced dog parks, playgrounds, water features, a ranger station, a recreation center, restroom facilities, amphitheater, walking/jogging/biking paths and trails, and other amenities. The passive park portion of the Riverwalk River Park is located adjacent to the MHPA and the San Diego River channel. Uses in this area would include walking/hiking trails and nature observation nodes with educational kiosks. Such passive recreation is compatible with the biological objectives of the City's MSCP Subarea Plan and MHPA; therefore, it is an appropriate use adjacent to the MHPA. The project also proposes a 50-foot wide no-use buffer flanking the San Diego River channel/MHPA. The passive park and no-use buffer function as a biological buffer established between the preserved/restored habitat along the San Diego River channel/MHPA and the active park and development areas.

As referenced in the Riverwalk BTR, the MSCP Land Use Adjacency Guidelines require that uses in or adjacent to the MHPA be designed to minimize noise impacts. Passive park uses located adjacent to the MHPA are not expected to generate noise levels that would adversely impact sensitive avian species occurring within the MHPA. Active park uses are evaluated herein to determine whether those facilities could generate noise levels that would exceed 60 dBA Leq, the generally accepted noise level established to determine impacts to avian sensitive species.

Reference noise levels for various active outdoor recreational uses were obtained for the purpose of evaluating potential impacts to sensitive species. The reference noise levels are summarized as follows:

- Soccer/outdoor field games – 52 dBA at 210 feet from the center of the field;
- Basketball/Sport Courts – 64 dBA Leq at 40 feet from the center of court;
- Softball fields – 75 dBA at 25 feet from home plate;
- Dog park – 52 dBA at 30 feet from park boundary;
- Playground – 64 dBA at 25 feet from the main concentration of activity;
- Amphitheater – 94 dBA at 20 feet from front of amplified speakers; and
- Walking Trail/Picnic Area – 60 dBA at five feet.

Noise associated with the use of walking trails and picnic areas are assumed to be conversations between people using these facilities. Noise associated with ball fields and playground also could exceed the 60 dBA level if located too close to the MHPA. The proposed distance for these uses from the MHPA would reduce the noise levels within the MHPA to below 60 dBA. Walking trails, picnic areas, and dog park uses were found to have a less than 60 dBA noise level and, therefore, have no specific, noise related, distance buffer requirements from the MHPA. Of the above potential uses, the amphitheater has the highest potential to produce excessive noise. As envisioned, any amphitheater would be designed to project away from the San Diego River corridor. Attenuation would be typical of a stationary noise source (i.e., six dBA per doubling of distance). The reference level at the amphitheater location would be 93 dBA at 12 feet, and noise levels would attenuate by six dBA per doubling of distance. Table 5.8-9, *Active Park Noise Levels at MHPA Boundary*, shows projected noise levels at the MHPA boundary line based on the reference levels above and distance from each source.

Provided design of the active park areas are consistent with City of San Diego Council Policy 600-33 and adheres to distance guidelines shown in Table 5.8-9, noise associated with use of the active recreation areas, with the exception of the amphitheater, would not exceed 60 dBA at the MHPA boundary provided they are constructed beyond the 60 dBA contour line shown on Figure 5.8-3. Noise levels associated with performances at the amphitheater would be approximately 66 dBA at the MHPA boundary assuming a reference level of 93 dBA at the shell front and location of the shell. Impacts to sensitive wildlife species within the San Diego River corridor could be significant and adverse without mitigation. Implementation of mitigation measure 5.8-2 would reduce impacts associated with use of the amphitheater to less than significant.

Table 5.8-9. Active Park Noise Levels at MHPA Boundary

Source	Reference Level	Approximate Distance to 60 dBA Contour	Approximate Distance to MHPA Boundary
Soccer Field ¹	52 dBA	0 feet	600 feet
Basketball/Sport Court ²	64 dBA	80 feet	600 feet
Softball Field ²	75 dBA	140 feet	600 feet
Dog Park ³	52 dBA	0 feet	80 feet
Playground ⁴	64 dBA	50 feet	200 feet
Amphitheater ⁵	87 dBA to 93 (front of shell)	500 feet (using 93-dBA reference level)	500 feet
Walking Trails/Picnic Areas	60 dBA	0 feet	50 feet

Sources:

¹EMC Planning Group, Inc., *Noise Assessment Study for High School Number 5, Salinas, CA.*, June 2011.

²Ldn Consulting, Inc. *Point Loma High School Environmental Impact Report Noise Study*, February 2016.

³Rincon Consultants, Beverly Hills Dog Park Project Draft Initial Study – Mitigated Negative Declaration, July 2015.

⁴Ldn Consulting, Inc. *Christian Elementary School at Faith Chapel Preliminary Noise Study*, February 2016.

⁵Los Angeles Unified School District, Central LA Area New High School No. 11, Environmental Impact Report, 2004.

Performances at the amphitheater would likely be audible along the western and northern boundaries of the South District. Thus, if residential units are constructed in the South District, exterior noise levels may exceed the 65 dBA standard within outdoor spaces (i.e., balconies and common areas). As discussed above, noise generated at the amphitheater shell would attenuate approximately six dBA per doubling of distance. Using a reference level of 93 dBA at the shell front, noise during performances would attenuate to approximately 65 dBA at 300 feet. As described, construction requirements and materials required per Title 24 would result in approximately a 30 dBA reduction in exterior noise levels. Provided the amphitheater shell is located 300 feet or more from residential units constructed in the South District, interior noise levels would be approximately 35 dBA with windows doors closed. Interior noise levels would be less than the 45 dBA residential interior standard.

There would be a minimum of approximately 150 feet and a maximum of approximately 520 feet between the 60-dBA contour (for any proposed use) and the MHPA, and that noise buffer area would include passive park, the 50-foot no-use buffer, and habitat restoration areas. Construction-related noise from such sources as clearing, grading, and construction vehicular traffic, however, could be excessive temporarily during the breeding season of sensitive species, and excessive noise must be avoided or minimized.

Grading activities could exceed the City's 60 dBA Leq threshold along the San Diego River corridor where sensitive bird species are known to occur. Thus, temporary, indirect impacts are likely to arise from construction-generated noise. If unmitigated, construction noise could result in nest abandonment or avoidance of habitat. Any potential indirect noise impacts to sensitive bird species, breeding habitat, and adjacent foraging habitat would be considered a significant impact requiring mitigation.

Significance of Impacts

Construction

Construction of the project would generate noise levels that exceed the 75-dBA threshold and thus may have temporary adverse noise impacts. The project would implement conditions directed at ameliorating nuisance level noise associated with construction. However, grading activities that exceed the City's 60 dBA threshold could occur adjacent to the San Diego River Corridor, where sensitive bird species are known to occur. Construction noise could result in nest abandonment or avoidance of habitat, resulting in a potential indirect impact. Temporary impacts to sensitive bird species during construction would be considered significant.

Operation

Assuming that exterior HVAC units are installed at the center of the roof tops, a 70-dBA reference noise level would attenuate to 52-dBA at 40 feet from the source. Roof top HVAC noise would be less than the 65-dBA criteria at the project property line. Depending on the size and location of ground-level HVAC units ambient conditions may increase by three dBA or more and impacts would be potentially significant.

Active park uses including walking trails, the sports court, soccer field, softball field, and the dog park, would not cause significant or adverse noise impacts at the MHPA boundary. Noise levels during individual events at the amphitheater could exceed 80 dBA the MHPA boundary depending on the location and orientation of the amphitheater. Potentially significant impacts to wildlife in the MHPA could result.

Mitigation Measures

Mitigation measures MM 5.8-1 and MM 5.8-2 would reduce operational noise levels of the proposed facilities to less than significant.

MM 5.8-1: Prior to issuance of Building Permit the City shall require the design and installation of stationary noise sources for the project to include the following:

- Implement best design considerations and shielding, including installing stationary noise sources associated with HVAC systems indoors in mechanical rooms.
- Prior to the installation of equipment, the applicant or its designee shall prepare an acoustical study(s) of proposed mechanical equipment, which shall identify all noise-generating equipment, predict noise level property lines from all identified equipment, and recommended mitigation to be implemented (e.g., enclosures, barriers, site orientation), as necessary, to comply with the City of San Diego noise ordinance.

MM 5.8-2: As part of any General Development Plan for the Riverwalk River Park, if an amphitheater is included in the site plan, Owner/Permittee shall perform an acoustical evaluation of the amphitheater, to be reviewed by both DSD and MSCP, that identifies the location and orientation of the amphitheater and confirms that noise levels from the amphitheater would not exceed 60 dBA hourly average at the MHPA boundary..

Significance of Impacts Following Implementation of Mitigation Measures

Implementation of mitigation measure MM 5.8-1 would reduce potentially adverse impacts associated with ground-level HVAC units to below a level of significance. Implementation of mitigation measure MM 5.8-2 would reduce potential impacts associated with the amphitheater to below a level of significance.



Figure 5.8-1. Surrounding Land Uses

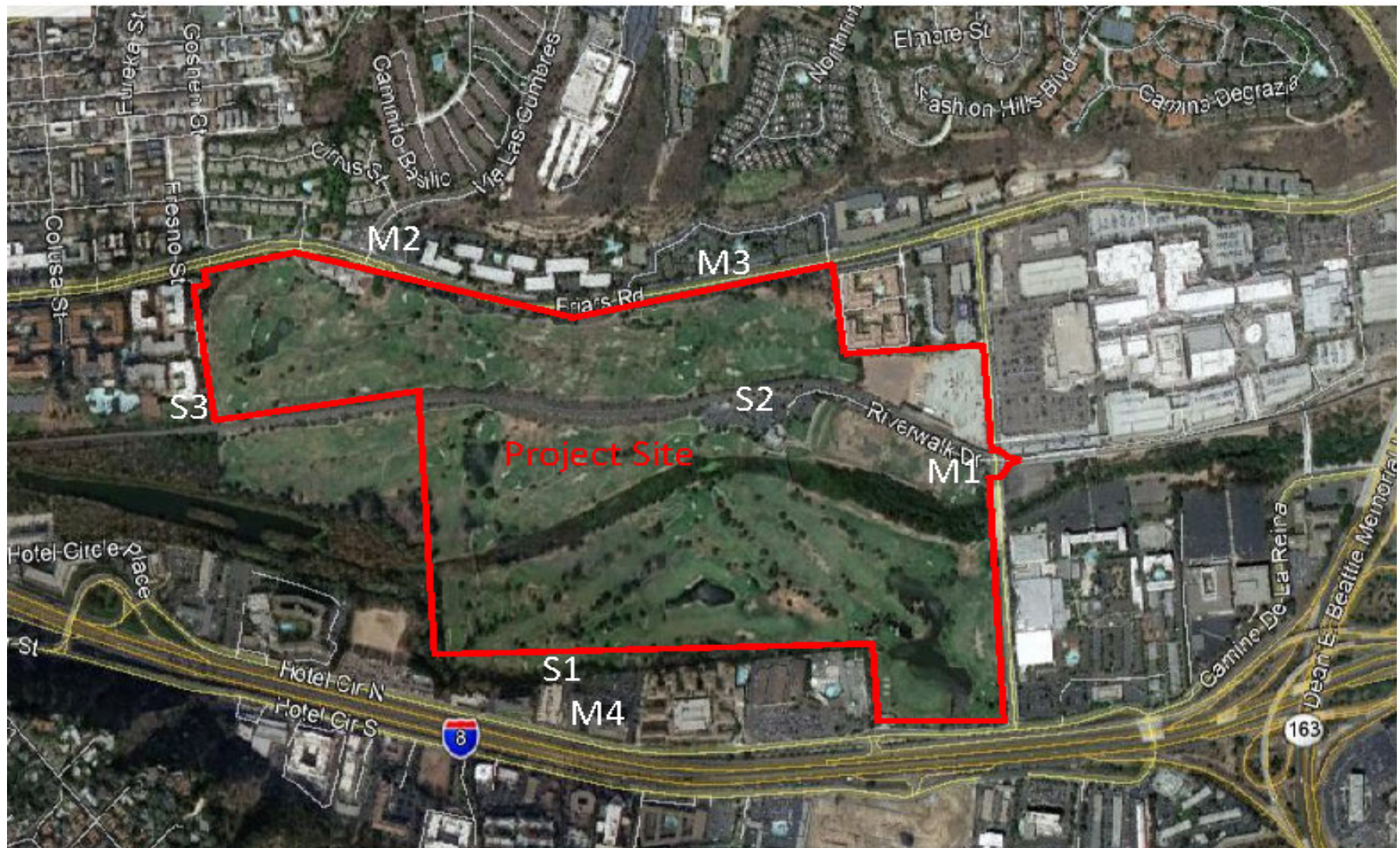


Figure 5.8-2. Noise Monitoring Locations

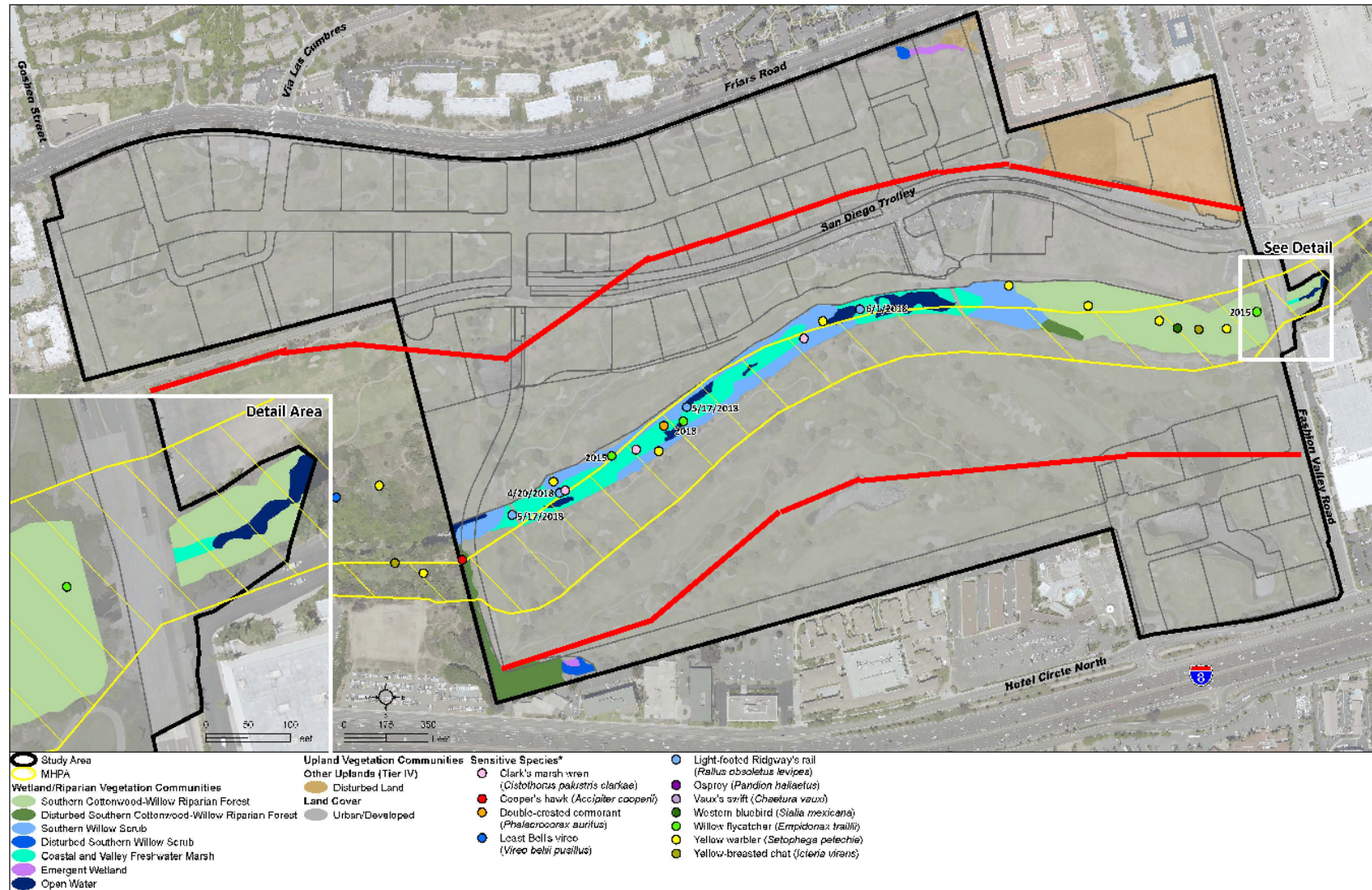


Figure 5.8-3. 60 dBA Construction Noise Contours

5.9 Greenhouse Gas Emissions

This section evaluates potential greenhouse gas emissions-related impacts associated with the project. The following discussion is based on the *Climate Action Plan Conformance Evaluation* and *Climate Action Plan Consistency Checklist* prepared by KLR Planning (April 2020), attached as Appendix C1 and Appendix C2, respectively.

5.9.1 Existing Conditions

5.9.1.1 Background

Global Climate Change (GCC) refers to any significant change in measures of climate, such as temperature, precipitation, or wind patterns that last for an extended period of time. The earth's temperature depends on the balance between energy entering and leaving the planet's system. Many factors, both natural and human, can cause changes in earth's energy balance, including variations in the sun's energy that reaches Earth, changes in the reflectivity of Earth's atmosphere and surface, and changes in the greenhouse effect, which affects the amount of heat retained by Earth's atmosphere.

The greenhouse effect is the trapping and buildup of heat in the atmosphere (troposphere) near the earth's surface. The greenhouse effect traps heat in the troposphere through a threefold process as follows: short-wave radiation emitted by the sun is absorbed by the earth, the earth emits a portion of this energy in the form of long-wave radiation, and GHGs in the upper atmosphere absorb this long-wave radiation and emit it into space and toward earth. The greenhouse effect is a natural process that contributes to regulating the earth's temperature.

Human activities that emit additional GHGs to the atmosphere increase the amount of infrared radiation absorbed before escaping into space; thus, enhancing the greenhouse effect and causing the earth's surface temperature to rise. The scientific record of the earth's climate shows that the climate system varies naturally over a wide range of time scales, and that in general, climate changes prior to the Industrial Revolution in the 1700s can be explained by natural causes, such as changes in solar energy, volcanic eruptions, and natural changes in GHG concentrations. However, recent climate changes, specifically the warming observed over the past century, cannot be explained by natural causes alone. Rather, human activity may have been the dominant cause of warming since the mid-twentieth century and are thought to be a significant driver of observed climate change. Human influence on the climate system is evident from the increasing GHG concentrations in the atmosphere, positive radiative forcing, observed warming and improved understanding of the climate system. The atmospheric concentrations of GHGs have increased primarily from fossil fuel emissions and secondarily from emissions associated with land use changes. Continued emissions of GHGs may cause further warming and changes in all components of the climate system.

GCC and GHGs have been at the center of a widely contested political, economic, and scientific debate. Although the conceptual existence of GCC is generally accepted, the extent to which GHGs generally and anthropogenic-induced GHGs contribute to it remains a source of debate. The State of California has been at the forefront of developing solutions to address GCC.

The United Nations Intergovernmental Panel on Climate Change (IPCC) constructed several emission trajectories of GHGs needed to stabilize global temperatures and climate change impacts. The IPCC concluded that a stabilization of GHGs at 400 to 450 ppm CO₂ equivalent concentration is required to keep global mean warming below 3.6°Fahrenheit (2° Celsius), which is assumed to be necessary to avoid dangerous climate change.

State law defines greenhouse gases as any of the following compounds: carbon dioxide (CO₂), methane (CH₄), nitrous oxide (N₂O), hydrofluorocarbons (HFCs), perfluorocarbons (PFCs), and sulfur hexafluoride (SF₆) [California Health and Safety Code Section 38505(g)]. CO₂, followed by CH₄ and N₂O, are the most common GHGs that result from human activity.

5.9.1.2 Sources and Global Warming Potentials of GHG

Anthropogenic sources of CO₂ include combustion of fossil fuels (coal, oil, natural gas, gasoline, and wood). CH₄ is the main component of natural gas and also arises naturally from anaerobic decay of organic matter. Accordingly, anthropogenic sources of CH₄ include landfills, fermentation of manure, and cattle farming. Anthropogenic sources of N₂O include combustion of fossil fuels and industrial processes such as nylon production and production of nitric acid. Other GHGs are present in trace amounts in the atmosphere and are generated from various industrial or other uses.

GHGs have varying global warming potential (GWP). The GWP is the potential of a gas or aerosol to trap heat in the atmosphere; it is the *"cumulative radiative forcing effect of a gas over a specified time horizon resulting from the emission of a unit mass of gas relative to a reference gas"* (EPA 2006). The reference gas for GWP is CO₂; therefore, CO₂ has a GWP of one. The other main greenhouse gases that have been attributed to human activity include CH₄, which has a GWP of 28, and N₂O, which has a GWP of 265. Table 5.9-1, *Global Warming Potentials and Atmospheric Lifetimes of GHGs*, presents the GWP and atmospheric lifetimes of common GHGs. In order to account for each GHG's respective GWP, all types of GHG emissions are expressed in terms of CO₂ equivalents (CO₂e) and are typically quantified in metric tons (MT) or millions of metric tons (MMT).

Table 5.9-1. Global Warming Potentials and Atmospheric Lifetimes of GHGs

GHG	Formula	100-Year Global Warming Potential	Atmospheric Lifetime (Years)
Carbon Dioxide	CO ₂	1	Variable
Methane	CH ₄	28	12
Nitrous Oxide	N ₂ O	265	121
Sulfur Hexafluoride	SF ₆	23,500	3,200
Hydrofluorocarbons	HFCs	100 to 12,000	1 to 100
Perfluorocarbons	PFCs	7,000 to 11,000	3,000 to 50,000
Nitrogen Trifluoride	NF ₃	16,100	500

Source: First Update to the Climate Change Scoping Plan, ARB 2014

The CARB) compiled a statewide inventory of anthropogenic GHG emissions and sinks that includes estimates for CO₂, CH₄, N₂O, SF₆, HFCs, and PFCs. The current inventory covers the years 1990 to 2012, and is summarized in Table 5.9-2, *State of California GHG Emissions by Sector*. Data sources used to calculate this GHG inventory include California and federal agencies, international organizations, and industry associations. The calculation methodologies are consistent with guidance from the IPCC. The 1990 emissions level is the sum total of sources and sinks from all sectors and categories in the inventory. The inventory is divided into seven broad sectors and categories in the inventory. These sectors include: Agriculture, Commercial, Electricity Generation, Forestry, Industrial, Residential, and Transportation.

Table 5.9-2. State of California GHG Emissions by Sector

Sector	Total 1990 Emissions (MMTCO ₂ e)	Percent of Total 1990 Emissions	Total 2012 Emissions (MMTCO ₂ e)	Percent of Total 2012 Emissions
Agriculture	23.4	5%	37.86	8%
Commercial	14.4	3%	14.20	3%
Electricity Generation	110.6	26%	95.05	21%
Forestry (excluding sinks)	0.2	<1%	Not reported	--
Industrial	103.0	24%	89.16	19%
Residential	29.7	7%	28.09	6%
Transportation	150.7	35%	167.38	36%
Recycling and Waste	Not reported	--	8.49	2%
High GWP Gases	Not reported	--	18.41	4%
Forestry Sinks	(6.7)	--	Not reported	--

In its Climate Action Plan, the City identified the 2010 baseline for GHG emissions of 13,091,591 million metric tons equivalent CO₂ (MT CO₂e). Based on the community-wide emissions inventory, 55 percent of the baseline emissions are attributable to transportation, 23 percent are attributable to

electricity use, 17 percent are attributable to natural gas use, and five percent are attributable to solid waste and wastewater handling and treatment.

5.9.1.3 Typical Adverse Effects

The Climate Scenarios Report (2006) uses a range of emissions scenarios developed by the IPCC to project a series of potential warming ranges (i.e., temperature increases) that may occur in California during the 21st Century. Three warming ranges were identified: lower warming range (3.0 °F to 5.5 °F); medium warming range (5.5 to 8.0 °F); and higher warming range (8.0 °F to 10.5 °F). The Climate Scenarios Report then presents an analysis of the future projected climate changes in California under each warming range scenario.

According to the report, substantial temperature increases would result in a variety of impacts to the people, economy, and environment of California. These impacts would result from a projected increase in extreme conditions, with the severity of the impacts depending upon actual future emissions of GHGs and associated warming. These impacts are described below.

Public Health

Higher temperatures are expected to increase the frequency, duration, and intensity of conditions conducive to air pollution formation. For example, days with weather conducive to O₃ formation are projected to increase by 25 to 35 percent under the lower warming range and 75 to 85 percent under the medium warming range. In addition, if global background O₃ levels increase as is predicted in some scenarios, it may become impossible to meet local air quality standards. An increase in wildfires could also occur, and the corresponding increase in the release of pollutants including PM_{2.5} could further compromise air quality. The Climate Scenarios Report indicates that large wildfires could become up to 55 percent more frequent if GHG emissions are not significantly reduced.

Potential health effects from GCC may arise from temperature increases, climate-sensitive diseases, extreme events, and air quality. There may be direct temperature effects through increases in average temperature leading to more extreme heat waves and less extreme cold spells. Those living in warmer climates are likely to experience more stress and heat-related problems (e.g., heat rash and heat stroke). In addition, climate sensitive diseases (such as malaria, dengue fever, yellow fever, and encephalitis) may increase, such as those spread by mosquitoes and other disease-carrying insects.

Water Resources

A vast network of reservoirs and aqueducts capture and transport water throughout the State from northern California rivers and the Colorado River. The current distribution system relies on Sierra Nevada mountain snowpack to supply water during the dry spring and summer months. Rising temperatures, potentially compounded by decreases in precipitation, could severely reduce spring

snowpack, increasing the risk of summer water shortages. In addition, if temperatures continue to rise more precipitation would fall as rain instead of snow, further reducing the Sierra Nevada spring snowpack by as much as 70 to 90 percent. The State's water resources are also at risk from rising sea levels. An influx of seawater would degrade California's estuaries, wetlands, and groundwater aquifers.

Agriculture

Increased GHG and associated increases in temperature are expected to cause widespread changes to the agricultural industry, reducing the quantity and quality of agricultural products statewide. Significant reductions in available water supply to support agriculture would also impact production. Crop growth and development would change as would the intensity and frequency of pests and diseases.

Ecosystems/Habitats

Continued global warming would likely shift the ranges of existing invasive plants and weeds, thus altering competition patterns with native plants. Range expansion is expected in many species while range contractions are less likely in rapidly evolving species with significant populations already established. Continued global warming is also likely to increase the populations of and types of pests. Continued global warming would also affect natural ecosystems and biological habitats throughout the state.

Wildland Fires

Global warming is expected to increase the risk of wildfire and alter the distribution and character of natural vegetation. If temperatures rise into the medium warming range, the risk of large wildfires in California could increase by as much as 55 percent, which is almost twice the increase expected if temperatures stay in the lower warming range. However, since wildfire risk is determined by a combination of factors including precipitation, winds, temperature, and landscape and vegetation conditions, future risks would not be uniform throughout the state.

Rising Sea Levels

Rising sea levels, more intense coastal storms, and warmer water temperatures would increasingly threaten the State's coastal regions. Under the high warming scenario, sea level is anticipated to rise 22 to 35 inches by 2100. A sea level risk of this magnitude would inundate coastal areas with salt water, accelerate coastal erosion, threaten levees and inland water systems, and disrupt wetlands and natural habitats.

Sea levels rose approximately seven inches during the last century and the State of California predicts an additional rise of 10 to 17 inches by 2050 and a rise of 31 to 69 inches by 2100, depending on the future levels of GHG emissions. If this occurs, resultant effects could include increased coastal flooding. Sea level rise adaptation strategies include strategies that involve construction of hard structures as barriers, such as seawalls and levees; soft structure strategies

such as wetland enhancement, detention basins, and other natural strategies; accommodation strategies that include grade elevations, elevated structures, and other building design options; and withdrawal strategies that limit development to areas unaffected by sea level rise.

Compliance with IBMC Section 15.50.160, *Flood Hazard Reduction Standards*, would require development within coastal high hazard areas to be elevated above the base flood level and be adequately anchored to resist flotation, collapse, and lateral movement as detailed in the regulatory framework section. The project is not within the coastal high hazard area, and is therefore not subject to the standards.

5.9.2 Regulatory Framework

All levels of government have some responsibility for the protection of air quality, and each level (Federal, State, and regional/local) has specific responsibilities relating to air quality regulation. GHG emissions and the regulation of GHGs is a relatively new component of this air quality regulatory framework.

5.9.2.1 Federal

In 1988, the United Nations and the World Meteorological Organization established the IPCC to assess the scientific, technical, and socioeconomic information relevant to understanding the scientific basis for human-induced climate change, its potential impacts, and options for adaptation and mitigation. The most recent reports of the IPCC have emphasized the scientific consensus that real and measurable changes to the climate are occurring, that they are caused by human activity, and that significant adverse impacts on the environment, the economy, and human health and welfare are unavoidable.

On March 21, 1994, the United States joined a number of countries around the world in signing the United Nations Framework Convention on Climate Change. Under the Convention, governments agreed to gather and share information on GHG emissions, national policies, and best practices; launch national strategies for addressing GHG emissions and adapting to expected impacts, including the provision of financial and technological support to developing countries; and cooperate in preparing for adaptation to the impacts of global climate change. The U.S. Supreme Court rules in *Massachusetts v. Environmental Protection Agency*, 549 U.S. 497 (2007), that EPA has the ability to regulate GHG emissions. In addition to the national and international efforts described above, many local jurisdictions have adopted climate change policies and programs.

On December 7, 2009, the EPA Administrator signed two distinct findings regarding GHGs under Section 202(a) of the Federal CAA:

Endangerment Finding: EPA found that the current and projected concentrations of the six key well-mixed GHGs (CO₂, CH₄, N₂O, HFCs, PFCs, and SF₆) in the atmosphere threaten the public health and welfare of current and future generations.

Cause or Contribute Finding: EPA found that the combined emissions of these well-mixed GHGs from new motor vehicles and new motor vehicle engines contribute to the GHG pollution which threatens public health and welfare.

These findings do not themselves impose any requirements on industry or other entities. However, this action was a prerequisite to finalizing the EPA's proposed greenhouse gas emission standards for light-duty vehicles, which were jointly proposed by EPA and the Department of Transportation's National Highway Safety Administration (NHTSA) in two phases: Phase 1 – Model Years 2012-2016 and Phase 2 – Model Years 2017 – 2025. The proposed standards for Model Years 2017-2025 are projected to achieve 163 grams/mile of CO₂ in Model Year 2025 on an average industry fleet-wide basis, which is equivalent to 54.5 miles per gallon if this level were achieved solely through fuel efficiency. The final rule was adopted in 2012 for Model Years 2017–2021, and NHTSA intends to set standards for Model Years 2022–2025 in a future rulemaking. In addition to these regulations applicable to cars and light-duty trucks, in 2011, EPA and NHTSA announced fuel economy and GHG standards for medium- and heavy-duty trucks for Model Years 2014–2018. The standards for CO₂ emissions and fuel consumption are tailored to three main vehicle categories: combination tractors, heavy-duty pickup trucks and vans, and vocational vehicles. According to the EPA, this regulatory program would reduce GHG emissions and fuel consumption for the affected vehicles by six percent to 23 percent over the 2010 baselines.

In August 2016, EPA and NHTSA announced the adoption of the phase two program related to the fuel economy and GHG standards for medium- and heavy-duty trucks. The phase two program would apply to Model Years 2018–2027 vehicles for certain trailers, and Model Years 2021–2027 for semitrucks, large pickup trucks, vans, and all types and sizes of buses and work trucks. The final standards are expected to lower CO₂ emissions by approximately 1.1 billion MT and reduce oil consumption by up to two billion barrels over the lifetime of the vehicles sold under the program

Mandatory GHG Reporting Rule

On March 10, 2009, in response to the fiscal year (FY) 2008 Consolidated Appropriations Act (House Resolution (H.R.) 2764; Public Law 110–161), the EPA proposed a rule that requires mandatory reporting of GHG emissions from large sources in the United States. On September 22, 2009, the Final Mandatory Reporting of Greenhouse Gases Rule was signed, and was published in the Federal Register on October 30, 2009. The rule became effective on December 29, 2009. The rule would collect accurate and comprehensive emissions data to inform future policy decisions.

The EPA requires suppliers of fossil fuels or industrial greenhouse gases, manufacturers of vehicles and engines, and facilities that emit 25,000 MT or more per year of GHG emissions to submit annual reports to EPA. The gases covered by the proposed rule are CO₂, CH₄, N₂O, HFC, PFC, SF₆, and other

fluorinated gases, including nitrogen trifluoride (NF₃) and hydrofluorinated ethers (HFE).

5.9.2.2 State

The following subsections describe regulations and standards that have been adopted by the State of California to address GCC issues.

Assembly Bill 32, the California Global Warming Solutions Act of 2006

The California Global Warming Solutions Act of 2006, widely known as AB 32, requires that CARB develop and enforce regulations for the reporting and verification of statewide GHG emissions. CARB is directed to set a GHG emission limit, based on 1990 levels, to be achieved by 2020. The bill requires CARB to adopt rules and regulations in an open public process to achieve the maximum technologically feasible and cost-effective GHG reductions.

Senate Bill 97

Senate Bill 97, enacted in 2007, amends the CEQA statute to clearly establish that GHG emissions and the effects of GHG emissions are appropriate subjects for CEQA analysis. It directs OPR to develop draft CEQA guidelines “for the mitigation of greenhouse gas emissions or the effects of greenhouse gas emissions” by July 1, 2009, and directs the Resources Agency to certify and adopt the CEQA guidelines by January 1, 2010.

Executive Order S-3-05

On June 1, 2005, EO S-3-05 proclaimed that California is vulnerable to climate change impacts. It declared that increased temperatures could reduce snowpack in the Sierra Nevada, further exacerbate California’s air quality problems, and potentially cause a rise in sea levels. In an effort to avoid or reduce climate change impacts, Executive Order S-3-05, signed by Governor Schwarzenegger on June 1, 2005, calls for a reduction in GHG emissions to 1990 levels by 2020 and for an 80 percent reduction in GHG emissions by 2050. Executive Order S-3-05 also calls for the CalEPA to prepare biennial science reports on the potential impact of continued GCC on certain sectors of the California economy. The first of these reports, *Our Changing Climate: Assessing Risks to California*, and its supporting document *Scenarios of Climate Change in California: An Overview* were published by the California Climate Change Center in 2006.

Executive Order B-30-15

On April 29, 2015, executive Order B-30-15 established an interim GH emission reduction goal for the State of California to reduce GHG emissions to 40 percent below 1990 levels by the Year 2030. This Executive Order directs all state agencies with jurisdiction over GHG-emitting sources to implement measures designed to achieve the new interim 2030 goal, as well as the pre-existing, long-term 2050 goal identified in Executive Order S-3-05 to reduce GHG emissions to 80 percent below 1990 levels by the Year 2050. The Executive Order directs ARB to update its Scoping Plan to

address the 2030 goal. It is anticipated that ARB would develop statewide inventory projection data for 2030 and commence efforts to identify reduction strategies capable of securing emission reductions that allow for achievement of the new interim goal for 2030.

Executive Order S-21-09

Executive Order S-21-09 was enacted by Governor Schwarzenegger on September 15, 2009. Executive Order S-21-09 requires that the CARB, under its AB 32 authority, adopt a regulation by July 31, 2010, that sets a 33-percent renewable energy target as established in Executive Order S-14-08. Under Executive Order S-21-09, the CARB would work with the Public Utilities Commission and California Energy Commission to encourage the creation and use of renewable energy sources, and would regulate all California utilities. The CARB would also consult with the Independent System Operator and other load balancing authorities on the impacts on reliability, renewable integration requirements, and interactions with wholesale power markets in carrying out the provisions of the Executive Order. The order requires the CARB to establish highest priority for those resources that provide the greatest environmental benefits with the least environmental costs and impacts on public health.

CARB's Scoping Plan

On December 11, 2008, CARB adopted the Scoping Plan (CARB 2008) as directed by AB 32. The Scoping Plan proposes a set of actions designed to reduce overall GHG emissions in California to the levels required by AB 32. Measures applicable to development projects include those related to energy-efficiency building and appliance standards, the use of renewable sources for electricity generation, regional transportation targets, and green building strategy. Relative to transportation, the Scoping Plan includes nine measures or recommended actions related to reducing vehicle miles traveled and vehicle GHGs through fuel and efficiency measures. These measures would be implemented statewide rather than on a project-by-project basis.

In response to EO B-30-15 and SB 32, all state agencies with jurisdiction over sources of GHG emissions were directed to implement measures to achieve reductions of GHG emissions to meet the 2030 and 2050 targets. CARB was directed to update the Scoping Plan to reflect the 2030 target and is moving forward with the update process. The mid-term target is critical to help frame the suite of policy measures, regulations, planning efforts, and investments in clean technologies and infrastructure needed to continue driving down emissions. CARB has released a second update to the Scoping Plan to reflect the 2030 target set by EO B-30-15 and codified by SB 32. The 2017 Climate Change Scoping Plan Update, Proposed Strategy for Achieving California's 2030 Greenhouse Gas Target, was adopted December 2017.

California Code of Regulations Title 24

Although not originally intended to reduce greenhouse gas emissions, California Code of Regulations Title 24 Part 6: California's Energy Efficiency Standards for Residential and Nonresidential Buildings were first established in 1978 in response to a legislative mandate to

reduce California's energy consumption. The standards are updated periodically to allow consideration and possible incorporation of new energy efficiency technologies and methods. The GHG emission inventory was based on Title 24 standards as of October 2005; however, Title 24 has been updated as of 2008 and standards are set to be phased in beginning in January 2010. The new Title 24 standards are anticipated to increase energy efficiency by 15 percent, thereby reducing GHG emissions from energy use by 15 percent. Energy efficient buildings require less electricity, natural gas, and other fuels. Electricity production from fossil fuels and on-site fuel combustion (typically for water heating) results in greenhouse gas emissions. Therefore, increased energy efficiency results in decreased greenhouse gas emissions.

Senate Bill 1078, Senate Bill 107, and Executive Order S-14-08

SB 1078 initially set a target of 20 percent of energy to be sold from renewable sources by the Year 2017. The schedule for implementation of the RPS was accelerated in 2006 with the Governor's signing of SB 107, which accelerated the 20 percent RPS goal from 2017 to 2010. On November 17, 2008, the Governor signed Executive Order S-14-08, which requires all retail sellers of electricity to serve 33 percent of their load with renewable energy by 2020. The Governor signed Executive Order S-21-09 on September 15, 2009, which directed ARB to implement a regulation consistent with the 2020 33 percent renewable energy target by July 31, 2010. The 33 percent RPS was adopted in 2010.

State Standards Addressing Vehicular Emissions

California Assembly Bill 1493 (Pavley) enacted on July 22, 2002, required the ARB to develop and adopt regulations that reduce greenhouse gases emitted by passenger vehicles and light duty trucks. Regulations adopted by ARB would apply to 2009 and later model year vehicles. ARB estimated that the regulation would reduce climate change emissions from light duty passenger vehicle fleet by an estimated 18 percent in 2020 and by 27 percent in 2030. Once implemented, emissions from new light duty vehicles are expected to be reduced in San Diego County by up to 21 percent by 2020.

The ARB has adopted amendments to the Pavley regulations that reduce GHG emissions in new passenger vehicles from 2009 through 2016. The amendments, approved by the ARB Board on September 24, 2009, are part of California's commitment toward a nation-wide program to reduce new passenger vehicle GHGs from 2012 through 2016, and prepare California to harmonize its rules with the Federal rules for passenger vehicles.

Executive Order S-01-07

Executive Order S-01-07 was enacted by the Governor on January 18, 2007, and mandates that: 1) a statewide goal be established to reduce the carbon intensity of California's transportation fuels by at least ten percent by 2020; and 2) a LCFS for transportation fuels be established for California. According to the San Diego County Greenhouse Gas Inventory (SDCGHGI), the effects of the LCFS would be a ten percent reduction in GHG emissions from fuel use by 2020. On April 23, 2009, the ARB adopted regulations to implement the LCFS.

Senate Bill 375

SB 375 finds that GHG from autos and light trucks can be substantially reduced by new vehicle technology, but even so *"it would be necessary to achieve significant additional greenhouse gas reductions from changed land use patterns and improved transportation. Without improved land use and transportation policy, California would not be able to achieve the goals of AB 32."* Therefore, SB 375 requires that regions with metropolitan planning organizations adopt sustainable communities strategies, as part of their regional transportation plans, which are designed to achieve certain goals for the reduction of GHG emissions from mobile sources.

SB 375 also includes CEQA streamlining provisions for "transit priority projects" that are consistent with an adopted sustainable communities strategy. As defined in SB 375, a "transit priority project" shall: (1) contain at least 50 percent residential use, based on total building square footage and, if the project contains between 26 and 50 percent nonresidential uses, a floor area ratio of not less than 0.75; (2) provide a maximum net density of at least 20 dwelling units per acre; and (3) be within 0.5 mile of a major transit stop or high quality transit corridor.

5.9.2.3 Local

2050 Regional Transportation Plan

The SANDAG Board of Directors adopted the Regional Plan of record and associated EIR on October 5, 2015. The current Regional Plan, San Diego Forward, consists of an RTP and, as required by SB 375, an SCS that demonstrates how the region would achieve GHG emission reduction targets for passenger vehicles set by CARB. Since SANDAG is required by law to update its RTP every four years, the 2019 Regional Plan represents the next iteration of SANDAG's blueprint of future transportation investments and forecasted regional growth and land use change across the County through 2050.

City of San Diego Climate Action Plan

In December 2015, the City of San Diego adopted its CAP. The CAP establishes a baseline for 2010, sets goals for GHG reductions for the milestone years 2020 and 2035, and details the implementation actions and phasing for achieving the goals. To implement the State's goals of reducing emissions to 15 percent below 2010 levels by 2020, and 49 percent below 2010 levels by 2035, the City would be required to implement strategies that would reduce emissions to approximately 10.6 MMT CO₂e by 2020 and to 6.4 MMT CO₂e by 2035. The CAP determined that, with implementation of the measures identified therein, the City would exceed the State's targets for 2020 and 2035. The CAP also identifies a comprehensive set of goals, policies, and actions that the City can use to reduce GHG emissions. The CAP includes five strategies: (1) water- and energy-efficient buildings; (2) clean and renewable energy; (3) bicycling, walking, transit, and land use; (4) zero-waste; and (5) climate resiliency.

City of San Diego Climate Action Plan Consistency Checklist

To provide a mechanism for CEQA tiering, the City developed a CAP Consistency Checklist to provide

a streamlined review process for GHG emissions for development subject to CEQA. The checklist contains measures that are required to be implemented on a project-by-project basis to ensure that the specified emissions targets identified in the CAP are achieved. Implementation of the measures identified in the checklist would ensure that new development is consistent with the CAP's assumptions for relevant CAP strategies toward achieving identified GHG reduction targets.

City of San Diego General Plan

The City's General Plan includes various goals and policies designed to help result in a reduction in GHG emissions. As discussed in the General Plan, climate change and GHG reduction policies are addressed in multiple chapters of the General Plan. The goal and policies related to GHG emissions relevant to the project are as follows:

Goal: To reduce the City's overall carbon dioxide footprint by improving energy efficiency, increasing use of alternative modes of transportation, employing sustainable planning and design techniques, and providing environmentally-sound waste management.

Policy CE-A.5 Employ sustainable or "green" building techniques for the construction and operation of buildings.

(a) Develop and implement sustainable building standards for new and significant remodels of residential and commercial buildings to maximize energy efficiency, and to achieve overall net zero energy consumption by 2020 for new residential buildings and 2030 for new commercial buildings. This can be accomplished through factors including, but not limited to:

- Designing mechanical and electrical systems that achieve greater energy efficiency with currently available technology;*
- Minimizing energy use through innovative site design and building orientation that addresses factors such as sun-shade patterns, prevailing winds, landscape, and sun-screens;*
- Employing self-generation of energy using renewable technologies;*
- Combining energy efficient measures that have longer payback periods with measures that have shorter payback periods;*
- Reducing levels of non-essential lighting, heating and cooling; and*
- Using energy efficient appliances and lighting.*

Policy CE-A-7 Construct and operate buildings using materials, methods, and mechanical and electrical systems that ensure a healthful indoor air quality. Avoid contamination by carcinogens, volatile organic compounds, fungi, molds, bacteria, and other known toxins.

(a) Eliminate the use of chlorofluorocarbon-based refrigerants in newly constructed facilities and major building renovations and retrofits for all heating, ventilation, air conditioning, and refrigerant-based building systems.

(b) Reduce the quantity of indoor air contaminants that are odorous or potentially irritating to protect installers and occupants' health and comfort. Where feasible,

select low-emitting adhesives, paints, coatings, carpet systems, composite wood, agrifiber products, and others.

- Policy CE-A.8 Reduce construction and demolition waste in accordance with Public Facilities Element, Policy PF-I.2, or be renovating or adding on to existing buildings, rather than constructing new buildings.*
- Policy 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;*
- Policy 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.*
- Policy 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.*
 - c. Decrease the amount of impervious surfaces in developments, especially where public places, plazas and amenities are proposed to serve as recreation opportunities.*
 - 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.*
 - 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.*
- Policy CE-A.12 Reduce the San Diego Urban Heat Island through actions 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 conditions units, and parking lots; and*

- *Reducing heat build up in parking lots through increased shading or use of cool paving materials as feasible.*

5.9.3 Impact Analysis

5.9.3.1 Issue 1

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

Impact Threshold

According to the City's Significance Determination Thresholds, projects that are consistent with the City's CAP, as determined through the CAP Consistency Checklist, would result in a less-than-significant cumulative impact regarding GHG emissions. If a project is not consistent with the City's CAP, as determined through the CAP Consistency Checklist, potentially significant cumulative GHG impacts would occur. For project-level environmental documents, significance is determined through the CAP Consistency Checklist.

Analysis

An assessment of the Specific Plan's conformance with the CAP was conducted through the CAP Conformance Evaluation (Appendix C1); whereas future development projects were assessed through the CAP Consistency Checklist (Appendix C2). Provided below are the results of the CAP Conformance Evaluation, followed by a summary of the project's consistency with the CAP Consistency Checklist.

The CAP Conformance Evaluation determined that the Riverwalk Specific Plan would be in conformance with the CAP. The project would implement the General Plan's City of Villages Strategy in a Transit Priority Area (TPA) by increasing the capacity for transit-supportive residential and employment densities. The project's land use and zoning would provide capacity for transit-supportive residential densities within a TPA and for transit-supportive employment by creating 1,152,000 combined square feet of employment uses (1,000,000 square feet employment use and 152,000 square feet of commercial use), which would increase the number of jobs within the TPA. Development of the Riverwalk project would be consistent with an Urban Village, defined by the General Plan as a land use that *[s]erves the region with many types of uses, including housing, in a high-intensity, mixed-use setting. Integration of commercial and residential use is emphasized; larger, civic uses and facilities are a significant component. Uses include housing, business/professional office, commercial service, and retail.* Riverwalk would provide for a high-intensity, mixed-use project that integrates residential, commercial, employment, and recreational uses within a TPA, consistent with the Mission Valley Community Plan. The Riverwalk Specific Plan includes accompanying implementation regulations to facilitate achievement of the Riverwalk's densities and intensities. The Specific Plan

includes targets for residential density (4,300 units at a zoning designation that allows up to 109 du/ac) and non-residential intensity (152,000 square feet of commercial use and 1,000,000 square feet of employment uses), consistent with the Mission Valley Community Plan.

The project would implement the General Plan's Mobility Element in a TPA to increase transit use and would provide a new transit stop for the Green Line Trolley, which would include a trolley stop and mobility hub. Future bus routes may be accommodated through the site, should MTS provide service in the future, as anticipated in the Mission Valley Community Plan. Development of the Riverwalk project would include transit priority measures, incorporating transit signal priority at at-grade trolley crossings. An exclusive transit way would be provided in the form of the dedicated Green Line trolley tracks running through and incorporated into the project site.

The Specific Plan would implement pedestrian improvements in a TPA to increase walking opportunities. The Riverwalk Specific Plan includes a varied and integrated pedestrian circulation network that would connect the various land uses (including residential, commercial, employment, and recreation) to each other and the new transit stop, consistent with the Mission Valley Community Plan. The Specific Plan includes policies to reinforce the pedestrian environment, addressing pedestrian-oriented site planning, materials, form and scale, massing, and activation.

The project would also implement the City of San Diego's Bicycle Master Plan to increase bicycling opportunities. Consistent with the Mission Valley Community Plan, Riverwalk is designed to efficiently accommodate bicycle traffic, with interconnected on-street and off-street facilities, such as bike lanes and multi-modal pathways. Riverwalk's streets contain elements that prioritize bicycle travel and encourage non-vehicular movement. The San Diego River Pathway that would be located on the north side of the San Diego River would accommodate bicyclists and would connect with bicycle facilities within Riverwalk, as well as the surrounding bicycle network. The bicycle network would also utilize the existing golf cart bridges to cross the San Diego River. The Riverwalk Specific Plan includes a circulation system that fully integrates pedestrian and bicycle connectivity, as anticipated in the Mission Valley Community Plan.

The Riverwalk project would include community-specific adaptation and resource conservation measures. The Riverwalk Specific Plan includes a greenbelt and street tree plan and would provide for the preservation of existing trees. Plant material selection would be selected to minimize the excessive use of water, pesticides, and fertilizers. The Riverwalk Specific Plan includes additional specific strategies and to support citywide energy, water, and waste reduction measures in support of the CAP, and includes policies as anticipated in the Mission Valley Community Plan. In accord with the City's Conservation Element and the Mission Valley Community Plan, Riverwalk seeks to reduce its *environmental footprint* and contribution of greenhouse gas emissions through an appropriate land use plan that contains a variety of land uses in proximity with one another (for example, local serving retail would provide food and beverage options for residents and guests) and connects those land uses in an efficient manner, promoting alternative modes of transportation and a variety of mobility options. These efforts are also in accordance with the City's Climate Action Plan,

supporting not only the advancement of the City of Villages concept, but also promoting active transportation options and improving accessibility.

The City's CAP Consistency Checklist focuses on operational emissions associated with planned land uses and includes a three-step process to determine project if a project would result in a greenhouse impact. Step 1 consists of an evaluation to determine the project's consistency with existing General Plan, Community Plan, and zoning designations for the site. Step 2 consists of an evaluation of the project's compliance with the CAP strategies. Step 3 is only applicable if a project is not consistent with the land use and/or zone, but results in a more intensive project in a transit priority area than assumed in the CAP.

Step 1: Land Use Consistency

Step 1 of the CAP Consistency Checklist assesses *a project's consistency with the growth projections used in development of the CAP*. To evaluate land use consistency under Step 1, a project's consistency *with the existing General Plan and Community Plan land use and zoning designations* is evaluated.

The project's proposed land uses and development intensity/density are consistent with the Mission Valley Community Plan and zones that went into effect with adoption of the update to the Mission Valley Community Plan. Specifically, the project proposes development under the RM-4-10 and CC-3-9 Citywide base zones. The Riverwalk Specific Plan requires a rezone to adjust the boundaries of the adopted zones in some areas to match the development area of the project and proposes modifications to these zones to further implement the goals and guidelines of the Mission Valley Community Plan. The areas to be rezoned include the park areas located between the San Diego River and Riverwalk Drive (OP-1-1 to CC-3-9) and the area east of Lot 40 and south of Riverwalk Drive (CC-3-9 to OP-1-1). The rezone does not result in an inconsistency with the existing zoning designation; rather it is a refinement to the zone boundaries. Because the project is consistent with the Mission Valley Community Plan, it is consistent with the General Plan.

The project includes a Community Plan Amendment to align the Mission Valley Community Plan with the Riverwalk Specific Plan (Appendix DD). This includes revisions to the Planned Land Use map (Figure 4 of the Mission Valley Community Plan) to adjust the overall site boundary and the boundaries of the existing land use designations to be consistent with the Riverwalk Specific Plan and to remove the "To be completed" reference on the Riverwalk Specific Plan area label. Furthermore, the project site will be removed from the CPIOZ map (Figure 39 of the Mission Valley Community Plan), consistent with the proposed Land Development Code amendment, and slight text changes will be made indicating that the specific plans identified in the Specific Plan Subdistrict were adopted prior to the adoption of the current Mission Valley Community Plan. The CPA does not result in an inconsistency with the Mission Valley Community Plan, as the CPA is a refinement to the land use map within the community plan to match the project's land use plan.

Although a Community Plan Amendment and rezone are being requested, the project was anticipated in the Mission Valley Community Plan land use and zoning designation applied to the Specific Plan area. Therefore, Step 1 of the CAP Consistency Checklist is answered in the affirmative under Option A (*Is the proposed project consistent with the existing General Plan and Community Plan land use and zoning designations?*).

Step 2: CAP Strategies Consistency

After determining consistency with Step 1 of the CAP Consistency Checklist, Step 2 is required to *review and evaluate a project's consistency with the applicable strategies and actions of the CAP*. The Project's conformance with each CAP Consistency Checklist measure is evaluated in Table 5.9-3, *CAP Strategies Consistency*.

As summarized in Table 5.9-3, *CAP Strategies Consistency*, the project would be consistent with all applicable CAP Consistency Checklist measures outlined in Step 2 and would be consistent with the City's CAP with respect to planning and land use strategies. The project would not impede the City's ability to implement the actions identified in the CAP to achieve the CAP's targets and associated GHG emission reductions.

Step 3: Project CAP Conformance Evaluation

Step 3 would only apply if Step 1 is answered in the affirmative under Option B (*If the proposed project is not consistent with the existing land use plan and zoning designations, and includes a land use plan and/or zoning designation amendment, would the proposed amendment result in an increased density within a Transit Priority Area (TPA) and implement CAP Strategy 3 actions, as determined in Step 3 to the satisfaction of the Development Services Department?*). As described above, Step 1 has been answered in the affirmative under Option A; therefore, Step 3 is not applicable. Nonetheless, Step 3 has been voluntarily completed to further demonstrate consistency with the CAP, as outlined above, and attached as Appendix C1 to this EIR.

Significance of Impacts

Both the Specific Plan and future projects associated with buildout of the plan would be consistent with the CAP. Therefore, the project would not result in a cumulatively significant generation of GHG emissions. Thus, impacts would be less than significant.

Mitigation Measures

No mitigation would be required.

5.9.3.2 Issue 2

Issue 2 Would the project conflict with the City's Climate Action Plan or any applicable plan, policy, or regulation adopted for the purpose of reducing emissions of greenhouse gases?

Impact Threshold

A project could result in a significant impact on greenhouse gas emissions if it would:

- Conflict with the City's Climate Action Plan or any applicable plan, policy, or regulation adopted for the purpose of reducing emissions of greenhouse gases.

Analysis

As discussed in Issue 1, above, the Specific Plan's conformance with the CAP was conducted through the CAP Conformance Evaluation (Appendix C1). In addition, future development projects were assessed through the CAP Consistency Checklist (Appendix C2). Based on the project's consistency with the CAP Consistency Checklist strategies, the project's contribution of GHG emissions to cumulative Statewide emissions would be less than cumulatively considerable. Overall, both the Specific Plan and future projects associated with buildout of the Specific Plan would be consistent with the CAP.

The Riverwalk Specific Plan includes a mix of residential, commercial retail, and employment uses that would encourage "village-like" development integrated with transit and active transportation facilities that is consistent with the General Plan and the City of Villages strategy. The Riverwalk Specific Plan also supports General Plan concepts such as increased walkability, enhanced pedestrian and bicycle networks, improved connections to transit, and sustainable development and green building practices.

Discussions, policies, and tailored development standards within the Riverwalk Specific Plan lay out residential densities and non-residential development intensities that support transit-oriented development by providing for increased residential density and on-site employment that supports implementation of the CAP. Discussion within Chapter 4, *Transportation and Circulation*, of the Riverwalk Specific Plan promote multi-modal development and provide for enhanced pedestrian and bicycle facilities. Discussions and regulations within Chapter 6, *Land Uses, Development Standards, and Design Guidelines*, require activation at the ground floor to increase pedestrian engagement. Chapter 6 also contains policies that support environmentally conscious building practices and materials, energy and water efficiency, on-site energy generation, and the reduction waste generation. All of these policies correspond with policies set out by the General Plan. Thus, the Riverwalk Specific Plan would be consistent with the City's General Plan.

As detailed in Section 5.9.2, numerous plans, policies, and regulations have been developed for the purpose of reducing GHG emissions. The project does not conflict with or inhibit implementation of those plans and regulations.

The City General Plan includes policies to reduce GHG emissions, delineated in Section 5.9.2.3. The project's consistency with these policies is analyzed in Table 5.9.4, *General Plan Conservation Element*

– *Project Consistency.* As shown in Table 5.9-4, the project would be consistent with the City's General Plan policies for reducing GHG emissions.

Significance of Impacts

The project would not conflict with the CAP or any other applicable plan, policy, or regulation adopted for the purpose of reducing emissions of greenhouse gases. Impacts would, therefore, be less than significant.

Mitigation Measures

No mitigation would be required.

Table 5.9-3. CAP Strategies Consistency

Strategy	Project Consistency
<p>1. Cool/Green Roofs.</p> <ul style="list-style-type: none"> Would the project include roofing materials with a minimum 3-year aged solar reflection and thermal emittance or solar reflection index equal to or greater than the values specified in the voluntary measures under California Green Building Standards Code; OR Would the project roof construction have a thermal mass over the roof membrane, including areas of vegetated (green) roofs, weighing at least 25 pounds per square foot as specified in the voluntary measures under California Green Building Standards Code? OR Would the project include a combination of the above two options? 	<p>Consistent – Development of the proposed project would include roofing materials meeting the performance standard of a minimum three-year aged solar reflection and thermal emittance or solar reflection index equal to or greater than the values specified in the measures under California Green Building Standards Code; or would include roof construction that meets the performance standard of a thermal mass over the roof membrane, including areas of vegetated (green) roofs, weighing at least 25 pounds per square foot as specified in the voluntary measures under California Green Building Standards Code; or would provide a combination of these two design features.</p>
<p>2. Plumbing fixtures and fittings</p> <p>With respect to plumbing fixtures or fittings provided as part of the project, would those low-flow fixtures/appliances be consistent with each of the following:</p> <p>Residential buildings:</p> <ul style="list-style-type: none"> Kitchen faucets: maximum flow rate not to exceed 1.5 gallons per minute at 60 psi; Standard dishwasher: 4.25 gallons per cycle; Compact dishwashers: 3.5 gallons per cycle; and Clothes washers: water factor of 6 gallons per cubic feet of drum capacity? <p>Nonresidential buildings:</p> <ul style="list-style-type: none"> Plumbing fixtures and fittings that do not exceed the maximum flow rate specified in Table A5.303.2.3.1 (voluntary measures) of the California Green Building Standards Code; and Appliances and fixtures for commercial applications that meet the provisions of Section A5.303.3 (voluntary measures) of the California Green Building Standards Code? 	<p>Consistent – For residential buildings/residential components of mixed-use buildings, the project would meet the performance standards by utilizing low-flow fixtures, to include kitchen faucets: maximum flow rate not to exceed 1.5 gallons per minute at 60 psi; standard dishwashers with water use of 4.25 gallons per cycle; compact dishwashers with water use of 3.5 gallons per cycle; and clothes washers with a water factor of six gallons per cubic feet of drum capacity. For non-residential buildings/non-residential components of mixed-use buildings, the project would meet the performance standards by utilizing plumbing fixtures and fittings that do not exceed the maximum flow rate specified in Table A5.303.2.3.1 (voluntary measures) of the California Green Building Standards Code. Appliances and fixtures for commercial applications would meet the provisions of Section A5.303.3 (voluntary measures) of the California Green Building Standards Code.</p>
<p>3. Electric Vehicle Charging</p> <ul style="list-style-type: none"> <u>Multiple-family projects of 17 dwelling units or less:</u> Would 3% of the total parking spaces required, or a minimum of one space, whichever is greater, be provided with a listed cabinet, box or enclosure connected to a conduit linking the parking spaces with the electrical service, in a manner approved by the 	<p>Consistent – The project proposes a mixed-use development that includes multi-family residential dwelling units and commercial retail and office and non-retail commercial space. It is assumed that individual multi-family developments within the proposed project would be more than 17 dwelling units. The project would comply with City requirements. Future total required parking and the required listed cabinets, boxes, or enclosures, would</p>

<p><i>building and safety official, to allow for the future installation of electric vehicle supply equipment to provide electric vehicle charging stations at such time as it is needed for use by residents?</i></p> <ul style="list-style-type: none">• <u>Multiple-family projects of more than 17 dwelling units:</u> <i>Of the total required listed cabinets, boxes or enclosures, would 50% have the necessary electric vehicle supply equipment installed to provide active electric vehicle charging stations ready for use by residents?</i>• <u>Non-residential projects:</u> <i>Of the total required listed cabinets, boxes or enclosures, would 50% have the necessary electric vehicle supply equipment installed to provide active electric vehicle charging stations ready for use?</i>	<p>include 50 percent of the required listed cabinets, boxes, or enclosures and would meet the performance standard by having the necessary electric vehicle supply equipment installed to provide active electric vehicle charging stations ready for use by residents.</p> <p>The project proposes 152,000 square feet of commercial retail use and 1,000,000 square feet of office and non- retail commercial use. Future total required parking and the required listed cabinets, boxes, or enclosures, would include 50 percent of the required listed cabinets, boxes, or enclosures and would meet the performance standard by having the necessary electric vehicle supply equipment installed to provide active electric vehicle charging stations. As individual development projects come forward for building permits allowed by the Specific Plan, they would be subject to permit conditions to provide electric vehicle charging facilities in accordance with the performance standards in the table provided in this section of the CAP Consistency Checklist.</p>																		
<p>4. Bicycle Parking Spaces</p> <p><i>Would the project provide more short- and long-term bicycle parking spaces than required in the City's Municipal Code (Chapter 14, Article 2, Division 5)?</i></p>	<p>Consistent – Each development within Riverwalk would provide short- and long-term bicycle parking in excess of the Municipal Code requirements.</p>																		
<p>5. Shower Facilities</p> <p><i>If the project includes nonresidential development that would accommodate over 10 tenant occupants (employees), would the project include changing/shower facilities in accordance with the voluntary measures under the California Green Building Standards Code as shown in the table below?</i></p> <table><tr><th>Number of Tenant Occupants (Employees)</th><th>Shower/Changing Facilities Required</th><th>Two-Tier (12" X 15" X 72") Personal Effects Lockers Required</th></tr><tr><td>0-10</td><td>0</td><td>0</td></tr><tr><td>11-50</td><td>1 shower stall</td><td>2</td></tr><tr><td>51-100</td><td>1 shower stall</td><td>3</td></tr><tr><td>101-200</td><td>1 shower stall</td><td>4</td></tr><tr><td>Over 200</td><td>1 shower stall plus 1 additional shower stall for each 200 additional tenant-occupants</td><td>1 two-tier locker plus 1 two-tier locker for each 50 additional tenant-occupants</td></tr></table>	Number of Tenant Occupants (Employees)	Shower/Changing Facilities Required	Two-Tier (12" X 15" X 72") Personal Effects Lockers Required	0-10	0	0	11-50	1 shower stall	2	51-100	1 shower stall	3	101-200	1 shower stall	4	Over 200	1 shower stall plus 1 additional shower stall for each 200 additional tenant-occupants	1 two-tier locker plus 1 two-tier locker for each 50 additional tenant-occupants	<p>Consistent – As individual development projects come forward for building permits allowed by the Specific Plan, shower/changing facilities and personal effects lockers would be provided in accordance with the performance standards in the table provided in this section of the CAP Consistency Checklist. The number of required shower/changing facilities and personal effects lockers would be based on the cumulative number of tenants/occupants (employees) within the entire Specific Plan area at the time of building permit application.</p>
Number of Tenant Occupants (Employees)	Shower/Changing Facilities Required	Two-Tier (12" X 15" X 72") Personal Effects Lockers Required																	
0-10	0	0																	
11-50	1 shower stall	2																	
51-100	1 shower stall	3																	
101-200	1 shower stall	4																	
Over 200	1 shower stall plus 1 additional shower stall for each 200 additional tenant-occupants	1 two-tier locker plus 1 two-tier locker for each 50 additional tenant-occupants																	
<p>6. Designated Parking Spaces</p>	<p>Consistent – The proposed project is located within a TPA. As individual non-residential development</p>																		

If the project includes a nonresidential use in a TPA, would the project provide designated parking for a combination of low-emitting, fuel-efficient, and carpool/vanpool in accordance with the following table?

Number of Required Parking Spaces	Number of Designated Parking Spaces
0-9	0
10-25	2
26-50	4
51-75	6
76-100	9
101-150	11
151-200	18
201 and over	At least 10% of total

projects come forward for building permits, as allowed by the Specific Plan, they would be subject to permit conditions to provide designated parking for a combination of low-emitting, fuel-efficient, and carpool/vanpool vehicles in accordance with the table in this section of the CAP Consistency Checklist.

7. Transportation Demand Management Program

If the project would accommodate over 50 tenant-occupants (employees), would it include a transportation demand management program that would be applicable to existing tenants and future tenants that includes:

At least one of the following components:

- *Parking cash out program*
- *Parking management plan that includes charging employees market-rate for single-occupancy vehicle parking and providing reserved, discounted, or free spaces for registered carpools or vanpools*
- *Unbundled parking whereby parking spaces would be leased or sold separately from the rental or purchase fees from the development for the life of the development*

And at least three of the following components:

- *Commitment to maintaining an employer network in the SANDAG iCommute program and promoting its RideMatcher service to tenants/employees*
- *On-site carsharing vehicle(s) or bikesharing*
- *Flexible or alternative work hours*
- *Telework program*
- *Transit, carpool, and vanpool subsidies*
- *Pre-tax deduction for transit or vanpool fares and bicycle commute costs*
- *Access to services that reduce the need to drive, such as cafes, commercial stores, banks, post offices, restaurants, gyms, or childcare, either*

Consistent – Any required TDM program(s) associated with development within Riverwalk would include such features as: unbundled parking for residential developments; parking cash out; subsidized transit passes; on-site carsharing vehicles and bikesharing; flexible or alternative work hours; telework programs; and access to services that reduce the need to drive, such as cafes, commercial stores, banks, post offices, restaurants, gyms, or childcare, either on-site or within one-quarter-mile of the structure/use. Such projects would follow the performance standards by incorporating at least one of the features from Category 1 of Strategy 3, Step 7; and at least three features from Category 2 of Strategy 3, Step 7.

onsite or within 1,320 feet (1/4) mile of the structure/use?	
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Table 5.9-4. General Plan Conservation Element – Project Consistency

Policy	Project Consistency
<p><i>Policy CE-A.5. Employ sustainable or “green” building techniques for the construction and operation of buildings.</i></p> <p><i>(a) Develop and implement sustainable building standards for new and significant remodels of residential and commercial buildings to maximize energy efficiency, and to achieve overall net zero energy consumption by 2020 for new residential buildings and 2030 for new commercial buildings. This can be accomplished through factors including, but not limited to:</i></p> <ul style="list-style-type: none"> <i>• Designing mechanical and electrical systems that achieve greater energy efficiency with currently available technology;</i> <i>• Minimizing energy use through innovative site design and building orientation that addresses factors such as sun-shade patterns, prevailing winds, landscape, and sun-screens;</i> <i>• Employing self-generation of energy using renewable technologies;</i> <i>• Combining energy efficient measures that have longer payback periods with measures that have shorter payback periods;</i> <i>• Reducing levels of non-essential lighting, heating and cooling; and</i> <i>• Using energy efficient appliances and lighting.</i> 	<p>Consistent – The project would be designed to meet Title 24 requirements, which addresses sustainable development. The project would also incorporate sustainable building and site design by designing buildings that meet CALGreen, California Green Building Standards Code, reduce energy use through building orientation, construct and operate buildings using materials and methods that promote healthful indoor air quality, consider re-use of building materials, low wattage and/or LED light features, and use of low flow shower heads , faucets, and toilets.</p>
<p><i>Policy CE-A.7. Construct and operate buildings using materials, methods, and mechanical and electrical systems that ensure a healthful indoor air quality. Avoid contamination by carcinogens, volatile organic compounds, fungi, molds, bacteria, and other known toxins.</i></p> <p><i>(a) Eliminate the use of chlorofluorocarbon-based refrigerants in newly constructed facilities and major building renovations and retrofits for all heating, ventilation, air conditioning, and refrigerant-based building systems.</i></p> <p><i>(b) Reduce the quantity of indoor air contaminants that are odorous or potentially irritating to protect installers and occupants’ health and comfort. Where feasible, select low-emitting adhesives, paints, coatings, carpet systems, composite wood, agrifiber products, and others.</i></p>	<p>Consistent – The project would utilize building materials and methods directed at improving indoor air quality. HVAC units would utilize filters that help screen-out harmful pollutants, operable windows would allow for natural ventilation, and the project’s open courtyards and offsetting planes would allow for air flow through the site.</p> <p>The Riverwalk Specific Plan also includes the following regulations (Reg-195 and Reg-196) that apply to residential development in the South District that front Hotel Circle North and are adjacent to I-8, and would contribute to healthful indoor air quality:</p> <ul style="list-style-type: none"> Reg-195. <i>Install air filtration devices rated minimum efficiency reporting value 13 (MERV-13) or higher in the intake of ventilation systems for lots 46 through 52. HVAC systems shall be installed with a fan unit designed to force air through the MERV</i>

	<p><i>filter. Prior to issuance of building permits, the project applicant shall submit evidence to the City of San Diego to ensure compliance with this measure. To ensure long-term maintenance and replacement of the MERV filters in accordance with the manufacturer's recommendations, the owner/property manager shall keep a record of activities related to maintenance of the filters.</i></p> <ul style="list-style-type: none"> • Reg-196. <i>Design residential buildings so that the air intakes do not occur on the southern side of buildings and away from I-8, to the extent feasible.</i>
<p><i>Policy CE-A.8.</i> Reduce construction and demolition waste in accordance with Public Facilities Element, Policy PF-I.2, or be renovating or adding on to existing buildings rather than constructing new buildings.</p> <p><i>Policy CE-A.9.</i> 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, though factors including:</p> <ul style="list-style-type: none"> • 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; 	<p>Consistent – The only building that would remain with the project would be the golf course clubhouse. The site is largely devoid of other buildings, with the only other structures being maintenance buildings. The project would retain the existing golf course clubhouse building as a project amenity, rather than demolishing the building and constructing a new building or buildings in this location, consistent with Policy CE-A.8.</p> <p>For Specific Plan implementation, new construction is required, as the golf course does not include buildings beyond the golf course clubhouse to remain and maintenance buildings. For new construction, the project would reduce construction and demolition waste in accordance with the LDC and the project's Waste Management Plan. The WMP includes requirements for use of post-consumer recycled content materials. The site does not include building materials that would be eligible for reuse. Per the WMP, demolition would include recycling of on-site materials to the extent possible.</p> <p>In addition, the Riverwalk Specific Plan implements the following policy relative to sustainable building and site design:</p> <p>Policy-77. <i>Consider re-use of building materials, materials that have post-consumer recycled content, and materials that are derived from sustainable or rapidly renewable sources.</i></p>
<p><i>Policy CE-A.10.</i> Include features in buildings to facilitate recycling of waste generated by building occupants and associated refuse storage areas.</p> <ul style="list-style-type: none"> • Provide permanent, adequate, and convenient space for individual building occupants to collect refuse and recyclable material. • Provide a recyclables collection area that serves the entire building or project. The space should allow for the separation, collection and storage 	<p>Consistent – The project would provide permanent, adequate, and convenient space for refuse and recyclable materials storage. Storage would be provided to serve entire buildings or projects.</p>

<p>of paper, glass, plastic, metals, yard waste, and other materials as needed.</p>	
<p><i>Policy CE-A.11. Implement sustainable landscape design and maintenance.</i></p> <ul style="list-style-type: none"> <i>b. Use integrated pest management techniques, where feasible, to delay, reduce, or eliminate dependence on the use of pesticides, herbicides, and synthetic fertilizers.</i> <i>c. Decrease the amount of impervious surfaces in developments, especially where public places, plazas and amenities are proposed to serve as recreation opportunities.</i> <i>d. Strategically plant deciduous shade trees, evergreen trees, and drought tolerant native vegetation, as appropriate, to contribute to sustainable development goals.</i> <i>e. Reduce use of lawn types that require high levels of irrigation.</i> <i>f. Strive to incorporate existing mature trees and native vegetation into site designs.</i> <i>j. Implement water conservation measures in site/building design and landscaping.</i> <i>k. 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.</i> 	<p>Consistent - Riverwalk's landscape plan includes native, native-friendly, and drought-tolerant landscaping. The project would implement sustainable landscape design and maintenance. With the exception of the plaza located at the transit stop, plazas would include a minimum of 20 percent landscaped area and achieve 0.05 point per square foot. Planting areas may be at-grade or in permanently affixed planters. The transit stop plaza would have a minimum of five percent landscaping to allow for community engagement in this space. Within the transit stop plaza, a minimum of 0.05 points per square foot is to be achieved with trees that are 36-inch box minimum.</p> <p>The Riverwalk Specific Plan includes policies and regulations relative to the strategic planting of shade trees, reduction of lawn types that require high levels of irrigation, and the use of water conservation measures and high-efficiency irrigation technology, and sustainable landscaping:</p> <ul style="list-style-type: none"> • Policy-58. Cool season grasses should be limited to highly visible project entrances and areas intended for active recreation. • Policy-81. Consider high efficiency irrigation technology and recycled water, when available, to reduce the use of potable water for irrigation. • Policy-82. Low-water-use plant material, automatic sprinkler systems with timers, and drip-irrigation systems are encouraged. • Policy-86. Deciduous trees should be used in south-facing and west-facing outdoor areas around buildings to provide solar access during winter months and shade in hot summer months. • Reg-98. Evergreen canopy-form shade trees are to be used within surface parking areas to reduce solar glare and provide variation in character. • Reg-128. Utilize trees to maximize energy efficiency. Place evergreen trees in surface parking lots to diminish heat island effect. • Reg-129. Incorporate water conservation measures in site/building design and landscaping. <p>The Riverwalk Specific Plan also includes the following language relative to the preservation of existing mature trees: <i>Existing on-site tree specimens will be analyzed on an individual basis for preservation in their present or in a new location to the greatest extent</i></p>

	<p><i>feasible. All efforts will be made to preserve mature trees where possible. Existing trees will be analyzed and assessed in accordance with Council Policy 900-19 and the Conserve-A-Tree Program. Additionally, the Specific Plan includes the following policy relative to existing trees along Friars Road:</i></p> <p><i>Policy-55.</i> <i>To the greatest extent feasible, the existing trees lining the south side of Friars Road will be retained to reinforce the visual character of Friars Road.</i></p>
<p><i>Policy CE-A.12. Reduce the San Diego Urban Heat Island through actions as:</i></p> <ul style="list-style-type: none"> <i>Using cool roofing materials, such as reflective, low heat retention tiles, membranes and coatings, or vegetated eco-roofs to reduce heat build-up;</i> <i>Planting trees and other vegetation, to provide shade and cool air temperatures. In particular, properly position trees to shade buildings, air conditions units, and parking lots; and</i> <i>Reducing heat build up in parking lots through increased shading or use of cool paving materials as feasible.</i> 	<p>Consistent – Relative to use to cool roofing materials, development of the proposed project would include roofing materials meeting the performance standard of a minimum three-year aged solar reflection and thermal emittance or solar reflection index equal to or greater than the values specified in the measures under California Green Building Standards Code; or would include roof construction that meets the performance standard of a thermal mass over the roof membrane, including areas of vegetated (green) roofs, weighing at least 25 pounds per square foot as specified in the voluntary measures under California Green Building Standards Code; or would provide a combination of these two design features.</p> <p>In addition, the Riverwalk Specific Plan includes the following policies and regulations relative to heat gain, parking lot landscaping, and reducing heat buildup:</p> <ul style="list-style-type: none"> <i>Policy-88.</i> <i>Overhangs or canopies should be used, where possible, to shade areas from direct sunlight and reduce heat gain.</i> <i>Policy-90.</i> <i>Consider larger surface parking areas to be located to the east and north of adjacent buildings to reduce solar reflection on buildings.</i> <i>Reg-98.</i> <i>Evergreen canopy-form shade trees are to be used within surface parking areas to reduce solar glare and provide variation in character.</i> <i>Reg-128.</i> <i>Utilize trees to maximize energy efficiency. Place evergreen trees in surface parking lots to diminish heat island effect.</i> <p>Building design for future development would also take into consideration measures to reduce heat gain, in accordance with sustainable building practices and regulations of Title 24 (or its successor in place at the time of development).</p>

5.10 Tribal Cultural Resources

This section evaluates potential Tribal Cultural Resources associated with the project. The analysis is based on the *Cultural Resources Inventory Report for the Riverwalk Project*, prepared by Spindrift Archaeological Consulting, LLC (October 2017), the corresponding *Addendum to the Class III Cultural Resource Inventory for the Riverwalk Project*, prepared by ASM Affiliates, Inc. (December 8, 2019) the *Archaeological Research and Data Recovery Program for the Riverwalk Redevelopment Project* by ASM Affiliates, Inc. (February 2020) and , *Interpretive signage for Tribal Cultural Resources for the Riverwalk Development Project* by ASM Affiliates, Inc (January 15, 2020) included as Appendices G, H, X and BB respectively. Additionally, the analysis is based on consultation with Native American tribes traditionally and culturally affiliated with the project area who have requested consultation pursuant to PRC Section 21080.3.1.

5.10.1 Existing Conditions

The project site is located within Mission Valley in central San Diego along the San Diego River which is a defining feature of the community. The valley sits at the crossroads of a regional freeway system, taking access from I-5, I-8, I-15, I-805, and SR 163. Mission Valley is a regional center of offices, hotels, and retail businesses, as well as a major regional visitor center, with a concentration of hotels located in close proximity to tourist attractions including Mission Bay Park, Sea World, and Balboa Park.

The site slopes gently towards the river, which curves through the central portion of the site. The site has been previously graded and is developed with the Riverwalk Golf Course, comprised of three nine-hole golf courses, driving range, clubhouse building, maintenance facilities, surface parking, access roadways, and golf cart paths/bridges. The San Diego River, as well as a segment of Green Line Trolley tracks, traverses the project site in an east-west direction.

5.10.1.2 Ethnographic, Religious, and Cultural Context

Many areas of San Diego County, including mesas and the coast, are known for intense and diverse prehistoric occupation and important archaeological and Tribal Cultural Resources. The project area is within the traditional territory of the Kumeyaay people, also known as Ipai, Tipai, or Diegueño (named for Mission San Diego de Alcalá). At the time of Spanish contact, Yuman-speaking Kumeyaay bands occupied southern San Diego and southwestern Imperial counties and northern Baja California. The Kumeyaay lived in semi-sedentary villages, or rancherias, with some rancherias containing more than one clan. Kumeyaay villages were located in river valleys, such as the San Diego River, with access to water and boulder outcrops and along the shoreline of coastal estuaries.

The Kumeyaay had a hunting and gathering economy based primarily on various plant resources. Grass seeds were a staple food resource second only to acorns in the Late Prehistoric native diet,

supplemented by other seeds and nuts. Grass and other plants also served as building material for making baskets and other items. Small game such as rabbits, jackrabbits, and rodents were important to the prehistoric diet; deer were somewhat less significant for food, but were an important source of leather, bone, and antlers. Coastal bands ate a great deal of fish, taking them with lines, nets, and bows and arrows. Balsas or reed boats were used. Shellfish and other littoral resources were important to coastal people too. Settlements were moved seasonally to areas where wild foods were in season. Villages and campsites were generally located in areas where water was readily available, preferably on a year-round basis. The San Diego River, which bisects the area, provided an important resource not only as a reliable source of water, but as a major transportation corridor through the region. Additional information regarding cultural context is provided in Section 5.6, *Historical Resources*.

5.10.2 Regulatory Framework

5.10.2.1 Federal

National Historic Preservation Act of 1966 and National Register of Historic Places

The National Historic Preservation Act of 1966 established the National Register of Historic Places (NRHP) as the official Federal list of cultural resources that have been nominated by State offices for their significance at the local, State, or Federal level. Listing on the NRHP provides recognition that a property is historically significant to the nation, the state, or the community. Properties listed (or potentially eligible for listing) on the NRHP must meet certain significance criteria and possess integrity of form, location, or setting. Barring exceptional circumstances, resources generally must be at least 50 years old to be considered for listing on the NRHP.

Criteria for listing on the NRHP are stated in Title 36, Part 60 of the Code of Federal Regulations (36 CFR 60). A resource may qualify for listing if there is quality of significance in American history, architecture, archaeology, engineering, and culture present in districts, sites, buildings, structures, and objects that possess integrity of location, design, setting, materials, workmanship, feeling, and association; and where such resources:

- Are associated with events that have made a significant contribution to the broad patterns of history.
- Are associated with the lives of persons significant in the past.
- Embody the distinctive characteristics of a type, period, or method of construction; represent the work of a master; possess high artistic values; or represent a significant and distinguishable entity whose components may lack individual distinction.
- Have yielded, or may be likely to yield, information important in prehistory or history.

Ordinarily cemeteries, birthplaces, or graves of historical figures, properties owned by religious institutions or used for religious purposes, structures that have been moved from their original locations, reconstructed historic buildings, properties primarily commemorative in nature, and properties that have achieved significance within the past 50 years are not considered eligible for the NRHP. However, such properties will qualify if they are integral parts of districts that do not meet the criteria or if they fall within the following categories:

- A religious property deriving primary significance from architectural or artistic distinction or historical importance; or
- A building or structure removed from its original location but which is significant primarily for architectural value, or which is the surviving structure most importantly associated with a historic person or event; or
- A birthplace or grave of a historical figure of outstanding importance if there is no appropriate site or building directly associated with his productive life; or
- A cemetery which derives its primary significance from graves of persons of transcendent importance, from age, from distinctive design features, or from association with historic events; or
- A reconstructed building when accurately executed in a suitable environment and presented in a dignified manner as part of a restoration master plan, and when no other building or structure with the same association has survived; or
- A property primarily commemorative in intent, if design, age, tradition, or symbolic value has invested it with its own exceptional significance; or
- A property achieving significance within the past 50 years if it is of exceptional importance.

Eligible properties must meet at least one of the NRHP criteria and exhibit integrity, measured by the degree to which the resource retains its historical properties and conveys its historical character, the degree to which the original historic fabric has been retained, and the reversibility of changes to the property. The fourth criterion is typically reserved for archaeological and paleontological resources. These criteria have largely been incorporated into the State CEQA Guidelines (Section 15064.5), as well.

5.10.2.2. State

California Health and Safety Code, Section 7050.5

This code requires that if human remains are discovered in the project site, disturbance of the site shall halt and remain halted until the coroner has conducted an investigation into the circumstances, manner, and cause of any death, and the recommendations concerning the treatment and disposition of the human remains have been made to the person responsible for the excavation, or to his or her authorized representative. If the coroner determines that the remains are not subject to his or her authority and recognizes or has reason to believe the human remains

are those of a Native American, he or she shall contact, by telephone within 24 hours, the Native American Heritage Commission.

California Public Resources Code, Sections 5020-5029.5

This code continued the former Historical Landmarks Advisory Committee as the State Historical Resources Commission. The commission oversees the administration of the California Register of Historical Resources and is responsible for the designation of State Historical landmarks and Historical Points of Interest.

California Public Resources Code, Section 5024.1

The CRHR is the State version of the NRHP program. The CRHR was enacted in 1992 and became official January 1, 1993. The CRHR was established to serve as an authoritative guide to the State's significant historical and archaeological resources. Resources that may be eligible for listing include buildings, sites, structures, objects, and historic districts. CEQA identifies a historic resource as a property that is listed on – or eligible for listing on – the NRHP, CRHR, or local registers. NRHP-listed properties are automatically included on the CRHR.

The CRHR also includes properties that: have been formally determined eligible for listing or are listed in the NRHP; are registered State Historical Landmark Number 770 and above; are points of historical interest that have been reviewed and recommended to the State Historical Resources Commission for listing; or are City- or County-designated landmarks or districts (if criteria for designation are determined by OHP to be consistent with CRHR criteria).

Assembly Bill 52

Assembly Bill 52 (AB 52), the Native American Historic Resource Protection Act, sets forth a proactive approach intended to reduce the potential for delay and conflicts between Native American and development interests. Projects subject to AB 52 are those that file a notice of preparation for an EIR or notice of intent to adopt a negative or mitigated negative declaration on or after July 1, 2016. AB 52 adds tribal cultural resources (TCR) to the specific cultural resources protected under CEQA. Under AB 52, a TCR is defined as a site, feature, place, cultural landscape (must be geographically defined in terms of size and scope), sacred place, or object with cultural value to a California Native American tribe that is either included or eligible for inclusion in the California Register, or included in a local register of historical resources. A Native American tribe or the lead agency, supported by substantial evidence, may choose at its discretion to treat a resource as a TCR. AB 52 also mandates lead agencies to consult with tribes, if requested by the tribe, and sets the principles for conducting and concluding consultation.

5.10.3 Impact Analysis

5.10.3.1 Issue 1

Issue 1 Would the project cause a substantial adverse change in the significance of a tribal cultural resources, defined in Public Resources Code section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place or object with cultural value to a California Native American tribe, and that is:

- a) Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code Section 5020.1(k), or*
- b) A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1. In applying the criteria set forth in subdivision (c) of Public Resources Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.*

Impact Threshold

The City of San Diego has not yet prepared thresholds of significance for potential impacts to Tribal Cultural Resources. Therefore, for purposes of this EIR, guidance provided by issue questions listed in CEQA Appendix G are utilized to evaluate the potential for significant impacts to Tribal Cultural Resources:

- Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code Section 5020.1(k), or
- A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1. In applying the criteria set forth in subdivision (c) of Public Resources Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.

Analysis

Tribal Cultural Resources include sites, features, places, cultural landscapes, and sacred places or objects that have cultural value or significance to a Native American Tribe. Tribal Cultural Resources include “non-unique archaeological resources” that, instead of being important for “scientific” value as a resource, can also be significant because of the sacred and/or cultural tribal value of the resource. Tribal representatives are considered experts appropriate for providing substantial

evidence regarding the locations, types, and significance of tribal cultural resources within their traditionally and cultural affiliated geographic area (PRC §21080.3.1(a)).

As discussed under Section 5.6, *Historical Resources*, the Riverwalk Specific Plan area is located on the City's Historical Resources Sensitivity Maps and recorded cultural resources have been mapped onsite. The Class III inventory conducted by Spindrift identified previously recorded cultural resources that are within or intersect the project site. Three of the cultural resources intersecting the project boundaries have been tested, evaluated, and recommended eligible for listing in the NRHP and/or the CRHR. Seven sites were evaluated and determined not significant under CEQA criteria. Three sites are in areas designated as open space and will not likely be impacted by the project. One site has not yet been formally evaluated, but it is in a portion of the project site that will not be impacted. One resource is an isolate find that was collected, and no further work is necessary.

The three recorded sites, SDI-11767, SDI-12220, and SDI-12126, have been evaluated and determined to be significant cultural resources. One site, SDI-4675, has not yet been evaluated, but only a small portion of the site intersects the project area and would not be impacted, as it would remain in its current open space condition. The remaining sites have been evaluated and were identified as not significant cultural resources under City guidelines and CEQA criteria. Additionally, a Sacred Lands Search was requested of the Native American Heritage Commission on September 25, 2017, and a response from the NAHC was received on September 27, 2017. The results of the Sacred Lands Search were negative. Additionally, all persons and organizations on the NAHC list were contacted to inquire about any concerns that might affect the site.

Also, the project site has not been selected as a site recommended for historic designation. Furthermore, the project site is not identified on any of the historic resource lists/databases—the NRHP and the California State Historical Landmarks, Points of Historical Interest, and Register of Historic Places.

The City of San Diego, as Lead Agency, determined that TCR (buried cultural resources and/or subsurface deposits) pursuant to Public Resources Code Section 5024.1(c) would be potentially impacted through future development in the Riverwalk Specific Plan area. Therefore, in accordance with the requirements of Public Resources Code 21080.3.1, the City of San Diego provided formal consultation notification to the Lipay Nation of Santa Isabel and Jamul Indian Village, both traditionally and culturally affiliated with the project area, on March 14, 2018. Both Native American Tribes responded within the 30-day formal notification period requesting consultation with the initial consultation occurring on March 15, 2018. Additional consultations with the Native American Tribes occurred on May 11, 2018; October 12, 2018; October 11, 2019; and March 19, 2020.

Through the consultation process, it was determined the site is a significant TCR due to the importance of the San Diego River corridor to the Kumeyaay. During various consultations, both the Lipay Nation of Santa Isabel and Jamul Indian Village requested the inclusion of a native plant palette

of species traditionally used by the Kumeyaay, an interpretive signage program that would identify the native plant species and how they were used, and that project streets be identified with Kumeyaay names. The Lipay Nation of Santa Isabel and Jamul Indian Village also reviewed and concurred with the Archaeological Data Recovery Program and associated monitoring program developed for the project.

The plant palette would incorporate plant species traditionally used by Native American tribes including mugwort (*Artemisia douglasiana*), mulefat (*Baccharis salicifolia*), western ragweed (*Ambrosia psilostachya*), California deergrass (*Muhlenbergia rigens*), red willow (*Salix lasiolepis*), elderberry (*Sambucus nigra*), Fremont's cottonwood (*Populus fremontii*), black willow (*Salix exigua*), and arroyo willow (*Salix lasiolepis*), yerba mansa (*Anemopsis*), spiny rush (*Juncus acutus*), pale spikerush (*Elocharis macrostachya*), Saltmarsh fleabone (*Pluchea odorata*), Creeping wild rye (*Leymus tritoides*), San Diego sagewort (*Artemisia palmeri*), Tarragon (*Artemisia dracunculus*), and Purple needlegrass (*Stipa pulchra*). The plant palette would be incorporated into the restoration effort taking place within the San Diego River and as part of the landscape plan for the Riverwalk River Park.

The interpretive signage program would be implemented that provide plant identification signs (each approximately six inches by eight inches). The signage would be provided along the trails within the River Park, with plants traditionally utilized by Native American tribes identified by a symbol. Additionally, a storyboard sign (approximately 20 inches by 30 inches) would also be provided to describe the native plants identified along the river pathway and their relationship to the Kumeyaay people's ability to thrive in the region.

Lastly, the streets within the South District of the project would include traditional Kumeyaay names. Both the Lipay Nation of Santa Isabel and Jamul Indian Village concurred with City staff's determination and concluded consultation on April 30, 2020.

In conclusion, due to the importance of the San Diego River corridor to the Kumeyaay, the onsite recorded archaeological sites, as well as the potential to encounter additional TCR (buried cultural resources and/or subsurface deposits) through ground-disturbing activities associated with development in the Riverwalk Specific Plan area, significant impacts to TCR could occur.

Significance of Impacts

The project site has not been selected as a site recommended for historic designation. Furthermore, the project site is not identified on any of the historic resource lists/databases—the National Register of Historic Places and the California State Historical Landmarks, Points of Historical Interest, and Register of Historic Places. The area is considered sensitive for TCR as identified by Lipay Nation of Santa Isabel and Jamul Indian Village, affiliated traditionally and culturally with the project area. Therefore, there is the potential for TCR to be impacted by project implementation. Impacts would be considered significant.

Mitigation Measures

- MM 5.10-1** Prior to issuance of Building Permit or beginning of any construction related activity for the Riverwalk River Park, the Development Services Department (DSD) Director's Environmental Designee (ED) shall verify the plant palette shown on construction documents includes plants from the following species traditionally utilized by the Native American tribes culturally affiliated with the project area in barrier plantings and adjacent to the River Park Pathway: mugwort (*Artemisia douglasiana*), mulefat (*Baccharis salicifolia*), western ragweed (*Ambrosia psilostachya*), California deergrass (*Muhlenbergia rigens*), red willow (*Salix lasiolepis*), elderberry (*Sambucus nigra*), Fremont's cottonwood (*Populus fremontii*), black willow (*Salix exigua*), and arroyo willow (*Salix lasiolepis*), yerba mansa (*Anemopsis*), spiny rush (*Juncas acutus*), pale spikerush (*Elocharis macrostachya*), Saltmarsh fleabone (*Pluchea odorata*), Creeping wild rye (*Ieymus tritcoides*), San Diego sagewort (*Artemisia palmeri*), Tarragon (*Artemisia dracunculus*), and Purple needlegrass (*Stipa pulchra*).
- MM 5.10-2** Prior to issuance of Building Permit or beginning of any construction related activity for the Riverwalk River Park, the Development Services Department (DSD) Director's Environmental Designee (ED) shall verify the interpretive signage along the River Pathway as shown on construction documents. Signage shall include 20 plant identification signs (each approximately six inches by eight inches) along the River Pathway with plants traditionally utilized by Native American tribes identified by a symbol. A storyboard sign (approximately 20 inches by 30 inches) shall also be provided that describes the native plants identified along the river pathway and their relationship to the Kumeyaay people's ability to thrive in the region. The interpretative signage plan shall be reviewed and accepted to the satisfaction of DSD, lipay of Santa Isabel, and Jamul Indian Village.
- MM 5.10-3** Prior to recordation of Final Map for the South District, Owner/Permittee shall submit a street sign plan that includes Kumeyaay street names to be reviewed and accepted to the satisfaction of DSD.
- MM 5.10-4** Prior to issuance of any construction permits, such as Demolition, Grading or Building, or beginning any construction related activity on-site, Owner/Permittee shall implement the conditions as detailed in MM 5.6-1 Historical Resources (Archaeological Data Recovery Monitoring) and MM 5.6-2 Historical Resources (Archaeology and Native American Monitoring).

Significance of Impacts Following Implementation of Mitigation Measures

With implementation of mitigation measure 5.10-1 through 5.10-4, Impacts to tribal cultural resources, would be reduced to below a level of significance.

5.11 Geologic Conditions

This section evaluates the potential geologic hazards associated with the project. The following discussion is based on the *Preliminary Geotechnical Investigation and Review of the Updated Grading Plan, Proposed Mixed-Use Redevelopment Project at Riverwalk Golf Course, City of San Diego, California* prepared by NMG Geotechnical, Inc. (November 27, 2019) and included as Appendix M.

5.11.1 Existing Conditions

5.11.1.1 Geologic Setting

The project site is located within the Peninsular Range Geomorphic Province of southern California. The province is characterized by a series of northwest-trending mountain ranges, separated by northwest-trending faults. The area is underlain by sedimentary deposits and is located near the San Diego embayment, which is characterized by marine, lagoonal, and non-marine deposits.

The project site is located in the wide alluvial Mission Valley, along the lower reaches of the San Diego River, approximately four to five miles inland from the coastline (Pacific Ocean). The river valley is broad in this location with hillsides to the north and south extending up to higher mesas. The valley was down cut significantly in the past during a time of low sea level, as evidenced by the deep alluvium to elevations of nearly minus 80 feet (below current day sea level). As sea level has fluctuated during the late Quaternary era, several levels of alluvium have been deposited and then eroded. Older alluvium underlies younger Holocene-age alluvium, and older river terrace deposits remain along the northern side of the valley.

5.11.1.2 Site Conditions

The topography of the project site consists of relatively level to gently sloping terrain incised by the San Diego River. The site is developed with a golf course and its associated facilities. The San Diego Metro Green Line Trolley crosses the site approximately 400 to 800 feet north and subparallel of the river. The trolley rail line was constructed on a raised berm across the site. Two small under-crossing tunnels, large enough for two golf carts or landscape equipment carts, exist on the site. In addition, two bridges to support golf carts and light vehicles exist over the river. Elevations range from 67 feet AMSL along the northern side of the project to a low of near 16 feet AMSL near the western river edge. The average (non-flood) river water level varies from 12 feet AMSL in the west to 15 feet AMSL in the east.

5.11.1.3 Geologic Conditions and Soils

The earth units encountered at the project site include alluvium, older alluvium, river terrace deposits, and bedrock. The earth units that were encountered are described below and depicted in Figure 5.11-1, *Geology Map*.

Alluvium (Qya)

Alluvium was the most prevalent earth unit found throughout the project site, underlying the majority of the site. The alluvium consists of loose to medium dense fine-grained clayey sand, silty sand and clean sand that is highly micaceous. Layers of dark gray sandy clay near and below sea level elevation were found in the western portions of the project site. These interlayers are believed to be estuary muds that were deposited during ancient times of low sea level. Local layers of gravelly sand was also found in the alluvium. The younger alluvium is underlain by older alluvium, terrace deposits, and/or bedrock.

Older Alluvium (Qalo)

Older Alluvium was encountered below the younger alluvium. This material varied in composition from sandy silt, silty sand, and gravelly sand that was generally denser than the overlying younger alluvium. This material is not exposed at the ground surface.

River Terrace Deposits (Qtr)

River Terrace Deposits were encountered throughout the northern central portion of the site. The terrace materials in the northern portion of the project site are dense, consolidated, and a mixture of cobble and fine-grained matrix.

Artificial Fills (Af)

Several different generations of artificial fills were found on site, including undocumented fill and three generations of compacted fill. Shallow undocumented fill associated with golf course contour grading exists within most of the site. During grading of the golf course compacted fill was placed near the clubhouse, parking lot, entry street and bridges. Fill materials were placed across the site for construction of trolley improvements. Also, compacted fill was encountered in the northeast portion of the site, north of the trolley and west of Fashion Valley Road. The aforementioned fills were encountered during the investigation generally consist of medium dense silty or clayey sand, with significant amounts of gravel and cobble.

Bedrock

Bedrock was encountered below the river terrace and alluvium deposits, near the western and northeast portions of the project site. The bedrock consists of yellow brown to dark gray silty fine or medium sandstone that is very moist and dense.

The previously mapped Bay Point Formation to the northwest of the project site is now mapped as the Nestor marine terrace deposit. Therefore, it was concluded that a different bedrock formation, other than the Bay Point Formation, underlies the project site. The very dense sandstone bedrock encountered at the project site may be another bedrock unit, such as the Scripps Formation. These formations would not be encountered during future grading or construction.

Expansive Soils

Based on soil mapping by the U.S. Department of Agriculture (USDA), the near-surface soils over the low-lying portions of the site are comprised of Tujunga sand. This material is generally granular, very permeable, and subject to erosion. Soils along the northern, higher elevations of the site are mapped as the Huerfuerro-Urban land complex. These soils are typically formed on marine terraces and consist primarily of clayey loam and sandy loam that is moderately permeable. Based on expansion testing of the near surface materials at the site, the expansion indices vary from "Very Low" to "Medium".

5.11.1.4 Geologic Hazards

Review of the 2008 City of San Diego Seismic Safety Study, Geologic Hazards and Faults, Sheet 35, indicated that the site is mapped as Geologic Hazard Categories 31 and 32. Category 31, listed under liquefaction, is described as "High Potential – shallow groundwater, major drainages, hydraulic fills." Category 32, listed under liquefaction, is described as "Low Potential – fluctuating groundwater, minor drainages." (See Figure 5.11-2, *City of San Diego Geohazard Map*.) The project site's susceptibility to liquefaction is discussed below.

Faulting/Seismicity

The Peninsular Range Province of Southern California is cut by a system of numerous active faults that trend north-northwest, subparallel with the San Andreas Fault. The closest seismically active faults are the north-south trending Rose Canyon Fault located approximately one mile to the west of the project site, and the Coronado Bank Fault, located approximately 12.5 miles west (offshore) of the project site. The Rose Canyon Fault is mapped as a Fault Rupture Hazard Zone by the California Geologic Survey to the north and south of Mission Valley, but not across Mission Valley. Other regionally active, more distant faults that could produce ground shaking at the project site include, but are not limited to, the Elsinore, San Jacinto, and San Andreas Faults. Despite the site's proximity to seismically active faults, there are no major or active faults mapped at the site. Further, the site is not located within a Fault-Rupture Hazard Zone as defined by the Alquist-Priolo Special Studies Zones Act.

Due to the site's location within a seismically active region, it is likely to experience ground shaking as a result of earthquakes. Since there are no active faults at the site, the potential for primary ground rupture is considered very low. The primary seismic hazard for this site is ground shaking due to a future earthquake on one of the major regional active faults listed above.

Landslide Potential and Slope Stability

The occurrence of landslides and other types of slope failures (e.g., rockfalls and mudslides) is influenced by a number of factors including slope grade, geologic and soil characteristics, moisture levels, and vegetation cover. Landslides can be triggered by one or more potentially destabilizing conditions or events, such as gravity, fires, precipitation, grading, and seismic activity. The project site contains fill slopes up to 20 feet high and is not subject to landslide potential or slope failure. These slopes are underlain by fill, alluvium and terrace deposits, with shallow groundwater. The alluvium is potentially liquefiable and is subject to lateral spread.

Liquefaction

Liquefaction is a phenomenon in which earthquake-induced cyclic stresses generate excess pore-water pressure in low density (loose), saturated, sandy soils and soft silts below the water table. In order to be subject to liquefaction, all of the following four conditions must be present: there must be severe ground shaking, such as occurs during a strong earthquake; soil material must be saturated or nearly saturated, generally below the groundwater table; corrected normalized standard penetration test must be relatively low; and the soil material must be granular (usually sands or silts) with only low plasticity, at most. There are four possible adverse consequences of liquefaction of sandy soil layers: liquefaction-induced settlements; loss of bearing and other possible local disruptions at the ground surface (sand boils); lateral spreading; and global scope instability due to flow liquefaction or lateral spread.

Based on the geotechnical investigations performed for the project, the liquefaction potential for the alluvium at the site is considered moderate. The potentially liquefiable soils layers generally range from 0.5 to 2.5 feet thick and locally up to 10 feet thick. The shallower liquefiable layers at the site have lower shear strength loss from liquefaction.

Tsunamis and Seiches

Tsunamis are great sea waves produced by submarine earthquakes or volcanic eruptions. Seiches are periodic oscillations in large bodies of water such as lakes, harbors, bays, or reservoirs. The potential for secondary seismic hazards, such as tsunamis and seiches, are considered low to nil, as the site is located away from the ocean and is at an elevation of 16 feet or higher AMSL. The project is located outside of the State mapped tsunami inundation zones, and is not located adjacent to a confined body of water; therefore, the potential for seismic hazard of a tsunami or seiche is considered very low.

5.11.1.5 Groundwater

The project site lies within the Mission Valley Groundwater Basin, in the east-west trending valley drained by the San Diego River. The primary source of groundwater recharge to this site is through rainfall and runoff, which results in infiltration of the river flow. There are two groundwater wells located in the eastern portion of the site that have been historically used for irrigation of the golf

course. During geotechnical investigations conducted for the project, groundwater was encountered typically at depths of five to 10 feet below ground surface (bgs) near the river, and between 10 and 25 feet bgs away from the river. Across the site, groundwater varied in elevation from approximately 6 feet AMSL to 15 feet AMSL in the alluvium.

Borings drilled into the dense river terrace deposits to depths of up to 26.5 feet did not encounter groundwater. This is most likely due to the higher ground elevations and shallow refusal depths. In borings drilled through the terrace deposits, groundwater was encountered at a depth of 47 feet bgs, and at an elevation of 11 feet AMSL. Groundwater was also encountered in borings drilled into the terrace deposits at depths of 11 and 25.6 feet and elevations of 14 and six feet AMSL, respectively.

The groundwater table fluctuates both seasonally and annually. Based on review of GeoTracker sites along Friars Road, the groundwater levels have been monitored over the past several years and were found to fluctuate depending upon the time of year and the rainfall that year. The groundwater is 22 to 35 feet deep to the east, near the intersection of Friars Road and Fashion Valley Road, and the soils are generally gravelly sand in this area. The water was found to fluctuate up to three feet from high to low levels recorded quarterly between 2003 and 2009. In addition, based on review of onsite boring data drilled over the years, the groundwater appears to vary three to four feet from high to low levels.

5.11.2 Regulatory Framework

5.11.2.1 Federal

International Building Code

The International Building Code (IBC, which encompasses the former Uniform Building Code [UBC]) is produced by the International Code Council (formerly the International Conference of Building Officials). The IBC provides standard specifications for engineering and construction activities, including measures to address geologic and soil concerns. Specifically, these measures encompass issues such as seismic loading (e.g., classifying seismic zones and faults), ground motion, engineered fill specifications (e.g., compaction and moisture content), expansive soil characteristics, and pavement design. The referenced regulations, while not compromising formal regulatory requirements per se, are widely accepted by regulatory authorities and are routinely included in related standards such as municipal grading codes. The IBC regulations are regularly updated to reflect current industry standards and practices, including criteria from the American Society of Civil Engineers (ASCE) and ASTM International (formerly the American Society for Testing and Materials [ASTM]).

5.11.2.2 State**California Seismic Hazards Mapping Act**

The California Seismic Hazards Mapping Act (PRC Division 2, Chapter 7.8, Section 2690 et seq.) provides a statewide seismic hazard mapping and technical advisory program to assist local governments in protecting public health and safety relative to seismic hazards. The act provides direction and funding for the State Geologist to compile seismic hazard maps (to designate zones of potential liquefaction and seismically induced landslide potential) and to make those maps available to local governments. The Act, along with related standards in the Seismic Hazards Mapping Regulations (CCR Title 14, Division 2, Chapter 8, Article 10, Section 3270 et seq.), also directs local governments to require the completion and review of appropriate geotechnical studies prior to approving development projects. These requirements are implemented on a local level through means such as General Plan directives and regulatory ordinances (with applicable City standards).

California Alquist-Priolo Earthquake Fault Zoning Act

The California Alquist-Priolo Act (PRC Section 2621 et seq.) is intended to prevent the construction of buildings used for human occupancy on the surface trace of active faults. The law requires the State Geologist to establish regulatory zones known as Earthquake Fault Zones (previously called Special Studies Zones and Fault-Rupture Hazard Zones) around the surface traces of active faults, and to distribute maps of these zones to all affected cities, counties, and State agencies. The Act also requires completion of a geologic investigation prior to project approval, to demonstrate that applicable structures will not be constructed across active faults and/or that appropriate setbacks from such faults (generally 50 feet) are included in the project design.

California Building Code

The California Building Code (CBC) (CCR title 24, Part 2) encompasses a number of requirements related to geologic issues. Specifically, these include general provisions, structural design, including soil and seismic loading; structural tests and special inspections, including seismic resistance; soils and foundations; concrete; masonry; wood, including consideration of seismic design categories; construction safeguards; and grading, including excavation, fill, drainage, and erosion control criteria. The CBC encompasses standards from other applicable sources, including the IBC and ASTM International, with appropriate amendments and modifications to reflect site-specific conditions and requirements in California.

5.11.2.3 Local**City of San Diego Seismic Safety Study**

The City Seismic Safety Study includes a series of maps identifying potential geologic hazards throughout the City. These maps provide a guide to determine relative risks and identify areas prone to hazards including active fault zones, liquefaction, and landslides/slope stability that require appropriate levels of geotechnical investigation prior to discretionary approvals. Specific

requirements related to the nature and level of required geotechnical investigations are outlined in Article 5, Division 18, Section 145.1803 of the SDMC; and Information Bulletin 515.

City of San Diego General Plan Policies

The Public Facilities, Services, and Safety Element of the City General Plan identifies a number of applicable policies related to seismic, geologic, and structural considerations. Specifically, Policies PF-Q.1 and PF-Q.2 include measures regarding conformance with State laws related to seismic and geologic hazards, conducting/reviewing geotechnical investigations, and maintaining structural integrity with respect to geologic hazards.

Additional City of San Diego Requirements

In addition to the regulatory standards listed above, City requirements related to geologic and geotechnical issues include obtaining a grading permit (per Article 9, Division 6, Section 129.0601 et seq. of the SDMC), and conformance with applicable elements of the City Storm Water Standards Manual and related documents (per Article 3, Division 3, Section 43.0301 et seq. of the SDMC). Storm water standards are discussed in more detail in Section 5.12, *Hydrology*, and Section 5.14, *Water Quality*.

5.11.3 Impact Analysis

5.11.3.1 Issue 1 and Issue 2

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

Issue 2: Would the project be located on a geologic unit or soil that is unstable or that would become unstable as a result of the project, and potentially result in an on- or off-site landslide, lateral spreading, subsidence, liquefaction, or collapse?

Impact Threshold:

Based on the City of San Diego's CEQA Significance Determination Thresholds, a project could result in a significant impact associated with geologic conditions if a project would:

- *Expose people or structures to geologic hazards such as earthquakes, landslides, mudslides, ground failure, or similar hazards;*
- *Be located on a geological unit or soil that is unstable or that would become unstable as a result of the project and potentially result in on-site or off-site landslides, lateral spreading, subsidence, liquefaction, or collapse.*

Analysis

The Riverwalk VTM provides details relative to grading, street design, and utility layout necessary to implement the land use plan of Riverwalk in an efficient manner. Grading for the project would consist of approximately 426,400 cubic yards of cut, approximately 1,454,000 cubic yards of fill and would import 1,028,000 cubic yards. The overall grading for the project would consist primarily of design fill of up to 25 feet above existing topography to create pads. There are design cuts within the North and Central Districts, both in the buildings and for the pads below Friars Road and the Trolley. These design cuts will be up to 13 feet deep. Design cuts up to 21 feet and fills up to four feet are proposed for the parks. There would be some cut slopes or retaining walls in the cut areas. Figure 3.10, *Riverwalk Grading Plan*, shows grading for the project.

Faulting/Seismicity

The project area is not located on any known active, potentially active, or inactive fault traces. Like all of Southern California, in the event of a major earthquake on the referenced faults or other significant faults in the southern California and northern Baja California area, the site could be subjected to moderate to severe ground shaking. Additionally, seismic design of the proposed structures would be performed in accordance with guidelines currently adopted by the CBC and other applicable regulatory standards. Conformance with the CBC and other applicable regulatory standards would reduce impacts to people or structures to an acceptable level of risk.

Landslide Potential and Slope Stability

Landslides are not present at the property nor at a location that could impact the site. Therefore, the risk associated with landslides hazard and slope stability would not occur.

Liquefaction

Preliminary slope stability analysis has been performed to consider static, seismic induced liquefaction (strength loss), and liquefaction induced post-seismic flow conditions. The proposed slopes are considered stable under static conditions, with a factor of safety of greater than 1.5, provided that the remedial grading recommendation included in the geotechnical report are implemented during the grading of the site.

The liquefaction analysis performed for the project site indicates that much of the saturated sandy and silty alluvium below the water table are considered liquefiable. Lateral ground spreading can occur when viscous liquefied soils flow down gradient, usually towards a river channel or shoreline. The project includes deeper ground improvement in slope areas next to the river to address potential seismically-induced lateral spread and flow conditions as a result of liquefaction.

There is also a potential for seismic settlements throughout the building areas underlain by alluvium. As a result, a combination of grading and ground improvement is recommended in these areas. Removals of the near surface alluvium will be made with heavy equipment down to a few

feet above the groundwater table and ground improvements will be installed to depths of between 10 and 25 feet below these levels. The excavated areas will then be filled to finish grades.

In addition, implementation of standard building practices would avoid impacts associated with liquefaction. With the implementation of the above ground improvements and structural design measures, the potential impacts will be reduced to an acceptable level. Impacts relative to lateral spreading or liquefaction would be less than significant.

Tsunamis and Seiches

The project is located outside of the mapped tsunami inundation zones and is not located adjacent to a confined body of water; therefore, the potential for seismic hazard of a tsunami or seiche is considered very low. No impacts would result.

Significance of Impacts

Conformance with recommendations of the project's Geotechnical Report and appropriate building design measures per the IBC/CBC would reduce the risk of potential effects from geologic hazards to an acceptable level of risk. Therefore, impacts would be less than significant.

Mitigation Measures

No mitigation would be required.

5.11.3.2 Issue 3

Issue 3: Would the project result in a substantial increase in wind or water erosion of soils, either on or off the site?

Impact Threshold

Based on the City of San Diego's California Environmental Quality Act Significance Determination Thresholds for impacts to geology, a project may result in a significant impact if a project would:

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

Analysis

Construction would involve grading activities that would expose and disturb soils and could, therefore, increase the potential for soil erosion. However, potential erosion impacts during construction would be avoided with adherence to the erosion control standards established by the City's grading ordinance. As presented in Section 5.12, *Hydrology*, a SWPPP would be implemented to identify detailed measures to prevent and control the discharge of pollutants in storm water runoff. As described in Section 5.14, *Water Quality*, drainage for the site would be adequately controlled such that substantial runoff would not occur, and storm drains have been sized to handle

storm water runoff. Proper construction BMPs would be implemented to avoid soil erosion during construction. Landscaping of the site in accordance with the proposed Landscape Plan would control erosion of topsoil after completion of construction. Also, the structural graded fill slopes next to the river will be protected from erosion by surface protection (i.e. rip-rap or other similar methods) and scour protection. As such, the potential for erosion to adversely impact the site is considered low. Wind erosion does not occur. The project would not result in a substantial increase in wind or water erosion, and there is a very low potential for the loss of topsoil.

Significance of Impacts

The project includes preparation and implementation of a SWPPP and BMPs. The SWPPP would be completed prior to project construction. Therefore, with implementation of the SWPPP and BMPs, and adherence to applicable standards, less than significant impacts associated with wind or water erosion of soils would occur and no mitigation measures are required.

Mitigation Measures

No mitigation would be required.

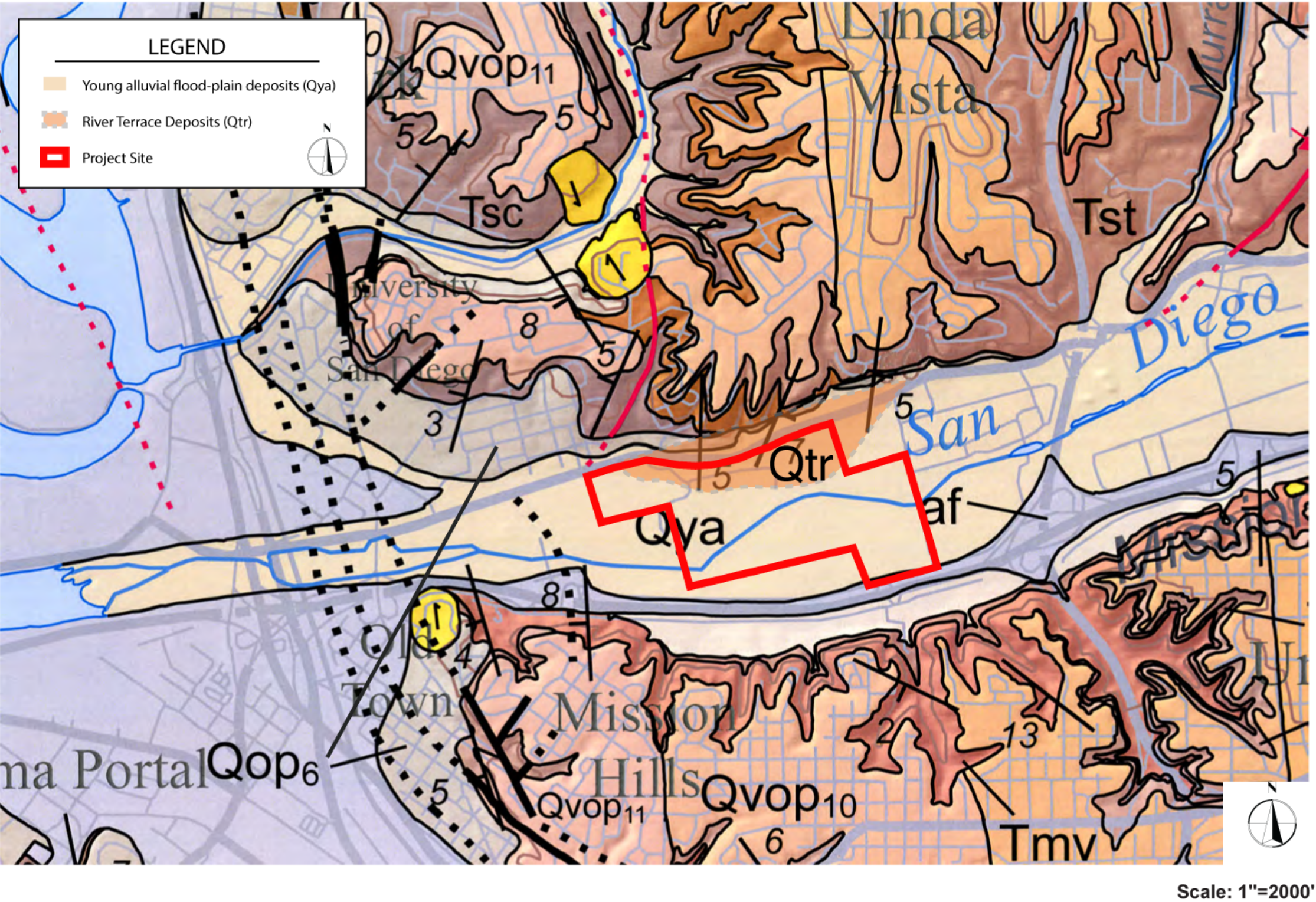


Figure 5.11-1. Geology Map

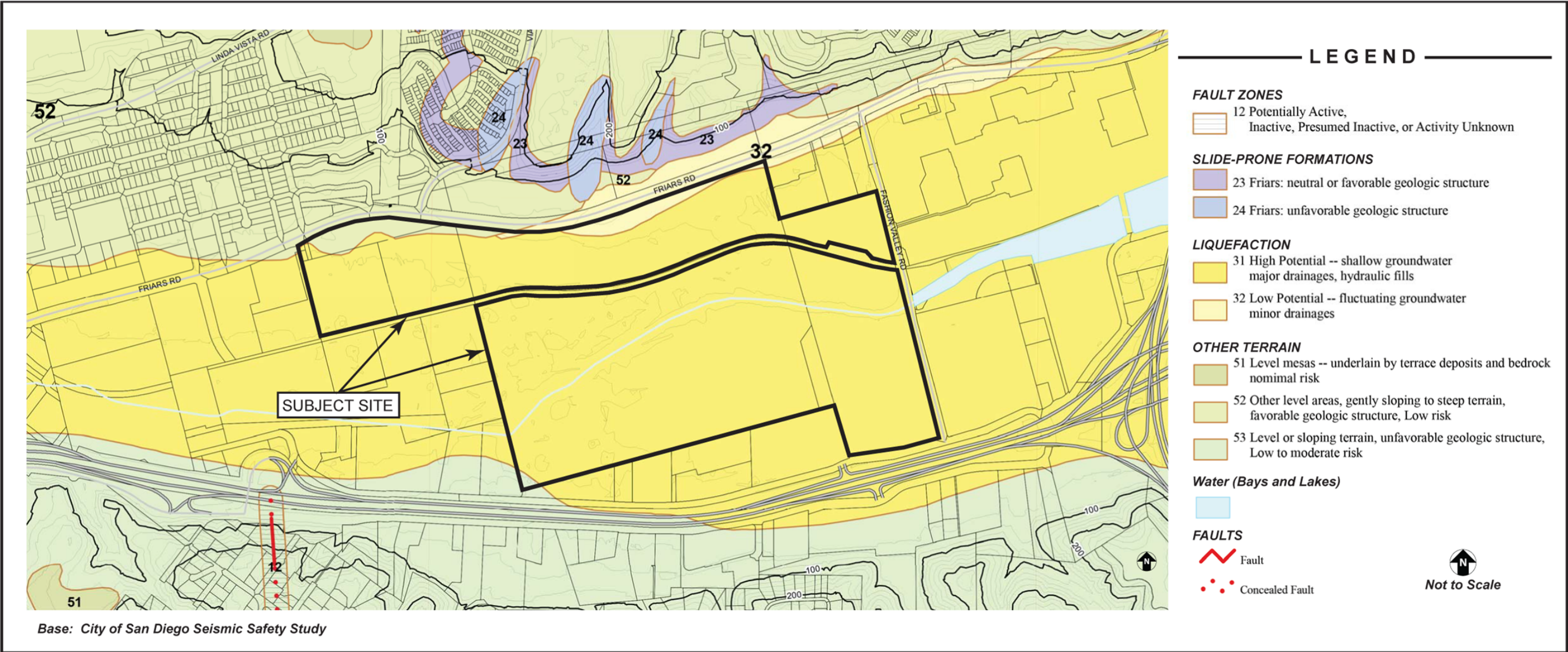


Figure 5.11-2. City of San Diego Geohazard Map

5.12 Hydrology

This section evaluates potential hydrology impacts associated with the project. The following discussion is based on the *Preliminary Drainage Report* (April 7, 2020) and the *Storm Water Quality Management Plan (SWQMP)* (April 7, 2020) prepared by Chang Consultants and are included as Appendices N and O, respectively.

5.12.1 Existing Conditions

The Riverwalk Specific Plan area is part of the San Diego River watershed and is located within the San Diego Hydrologic Unit (HU 907.00). The project site currently supports the Riverwalk Golf Club and is primarily pervious, consisting of three nine-hole golf courses and associated landscaping, accessory buildings, parking, and other hardscape. Non-vegetated pervious areas include sand traps and miscellaneous dirt areas. Impervious surfaces include parking lots, golf cart paths, sidewalks, hardscape, and a clubhouse. Under existing conditions the amount of pervious and impervious surfaces can be broken down as:

Condition	Total* (acres)
Permeable	160.67
Impermeable	12.97
TOTAL	173.63

* Total includes project site area, except the San Diego River, MTS (trolley) areas and areas not graded/improved with the project (approximately 21 acres).

5.12.1.1 Surface Water

The project site is located within the lower San Diego subunit of the San Diego Hydraulic Unit, Lower San Diego Hydrologic Area, Mission San Diego Hydrologic Subarea, Basin Number 907.11, as identified in the Water Quality Control Plan for the San Diego Basin. The main receiving water body in this Hydrologic Subarea is the San Diego River. The San Diego Hydraulic Unit drains an approximately 440-square-mile area and discharges the combined drainages of the Alvarado Canyon, San Vicente Creek, and Foster Creek through the San Diego River into the Pacific Ocean. The drainage area extends easterly to Lake Cuyamaca and westerly to Mission Bay. Average annual precipitation ranges from approximately 9.9 inches along the coast to in excess of 40 inches in the inland mountains.

5.12.1.2 Flooding

FEMA provides all floodplain information through the publication of FIRMs. All FIRMs delineate the location of 100- and 500-year floodplains. Based on these maps, a large portion of the project site is

within the San Diego River 100-year floodplain floodway. (See Figure 2-5, *FEMA 100-Year Floodway and Floodplain Map*.)

According to the Mission Valley Community Plan, *[t]he majority of the Community Plan area is developed and is highly impervious in the existing condition. Flooding sources in the Community Plan area include local surface runoff from developed areas and riverine flooding from the San Diego River and its tributaries. Among the areas identified in the Mission Valley Community Plan as within the 100-year floodplain of the San Diego River is the areas west of SR-163 – Avenida Del Rio, including portions of Fashion Valley Road (low water crossings very frequently flooded during lower storm events) proximate to the project site.*

Flooding in Mission Valley can occur during and after heavy rains. Road crossings/culverts are impassable during some storm events. According to the Community Plan, Avenida Del Rio, Fashion Valley Road, and San Diego Mission Road are the most susceptible to flooding and typically flood in five-year storm events and greater. The Mission Valley Community Plan recognizes that [l]arge areas of impervious surfaces (buildings, roadways, and surface parking) are interspersed with a smaller amount of pervious areas. Future buildout of the Community Plan area could result in new or increased impervious surfaces. For example, the Riverwalk development proposes new commercial/office, mixed-use, and residential uses in an area that is currently pervious (currently Riverwalk Golf Course).

5.12.1.3 Drainage

The floodplain and floodway flow in a westerly direction across the project site and are primarily south of the MTS trolley tracks. Site runoff north of the river channel flows southerly in a series of landscape area drains and existing storm drain pipes, as well as via overland flow. An existing east-west trolley embankment splits the northerly portion of the site. The area north of the trolley embankment discharges to the San Diego River via existing storm drain outfalls. The area south of the trolley embankment (but still north of the river), drains southerly via a combination of storm drains and, to a lesser degree, overland flow. Site runoff south of the river drains northerly via a series of landscape area drains and existing storm drains and, to a lesser degree, as overland flow.

The project site receives a considerable amount of off-site run-on from Friars Road (northerly project boundary) and properties further to the north. The off-site flow is conveyed to the San Diego River via existing on-site storm drains.

5.12.1.4 Groundwater

As discussed in Section 5.11, *Geologic Conditions*, groundwater was encountered within exploratory borings at approximate depths ranging from five to 10 feet below ground surface near the San Diego River, and between 10 feet and 25 feet away from the river. Groundwater varies across the site in elevation from approximately six feet AMSL to 15 feet AMSL in the alluvium. Based on review

of GeoTracker sites along Friars Road, the groundwater levels have been monitored over the past several years and found that the groundwater table fluctuates both seasonally and annually.

5.12.2 Regulatory Framework

5.12.2.1 Federal

Clean Water Act/National Pollutant Discharge Elimination System Requirements

The project is subject to applicable elements of the CWA, including the NPDES. Specific NPDES requirements associated with the project include conformance with the following:

- General Permit for Storm Water Discharges Associated with Construction and Land Disturbance Activities (Construction General Permit, NPDES No. CAS000002, SWRCB Order 2009-0009-DWQ; as amended by Order Nos. 2010-0014-DWQ and 2012-0006-DWQ);
- General Groundwater Extraction Discharges to Surface Waters Permit (Groundwater Permit; NPDES No. CAG919003, Order No. R9-2015-0013);
- Waste Discharge Requirements for Municipal Separate Storm Sewer Systems (MS4) Permit (Municipal Permit, NPDES No. CAS 0109266, Order No. R9-2013-0001, as amended by Order Nos. R9-2015-0001 and R9-2015-0100); and
- General Permit for Storm Water Discharges Associated with Industrial Activities (Industrial Permit, NPDES No. CAS000001, Order No. 2014-0057-DWQ). In California, the EPA has delegated authority for implementing NPDES requirements to the SWRCB; therefore, these permits are described below under state standards (and related City requirements discussed under local standards).

Federal Emergency Management Agency

FEMA, under the Department of Homeland Security, provides a single point of accountability for all Federal emergency preparedness and mitigation and response activities. This includes flood hazards. They are responsible for programs that take action before a disaster, in order to identify risks and reduce injuries, loss of property, and recovery time. The agency has major analysis programs for floods, hurricanes and tropical storms, dams, and earthquakes. FEMA also works to enforce no-build zones in known floodplains and relocate or elevate some at-risk structures. California is located in FEMA Region IX. Coordination is carried out by their Oakland office.

As part of these planning efforts, FEMA provides Letters of Map Revision, in which they formally evaluate modification to flow patterns and either approve proposed actions or require project redesign. A Conditional Letter of Map Revision (CLOMR) is FEMA's comment on a proposed project that would, upon construction, affect the hydrologic or hydraulic characteristics of a flooding source and thus result in the modification of the existing regulatory floodway, the effective Base Flood Elevations (BFEs), or the Special Flood Hazard Area (SFHA). It is conditional because it sets forth

requirements for design that must be implemented in order to revise the floodplain and/or floodway.

Executive Order 11988, Floodplain Management

The major requirements of this Federal order are to avoid support of floodplain development; to prevent uneconomic, hazardous, or incompatible use of floodplains; to protect and preserve the natural and beneficial floodplain values; and to be consistent with the standards and criteria of the National Flood Insurance Program. The basic tools for regulating construction in potentially hazardous floodplain areas are local zoning techniques. Proper floodplain zoning can be beneficial in the preservation of open space, retention of floodplains as groundwater recharge areas, and directing of development to less flood-prone areas.

5.12.2.2 State

National Pollutant Discharge Elimination System Construction General Permit

Projects that involve land disturbance of one acre or more (or that are part of a larger plan of development that would disturb one or more acres) are subject to pertinent requirements under the Construction General Permit. Specific conformance requirements include implementing a SWPPP, an associated Construction Site Monitoring Program (CSMP), employee training, and minimum BMPs, as well as a Rain Event Action Plan (REAP) for applicable projects (e.g., those in Risk Categories 2 or 3, as described below).

Under the Construction General Permit, project sites are designated as Risk Level 1 through 3 based on site-specific criteria (e.g., sediment erosion and receiving water risk), with Risk Level 3 sites requiring the most stringent controls. Based on the site-specific risk level designation, the SWPPP and related plans/efforts identify detailed measures to prevent and control the discharge of pollutants in storm water runoff. Depending on the risk level, these may include efforts such as minimizing/stabilizing disturbed areas, mandatory use of technology-based action levels, effluent and receiving water monitoring/reporting, and advanced treatment systems (ATS). Specific pollution control measures require the use of best available technology economically achievable (BAT) and/or best conventional pollutant control technology (BCT) levels of treatment, with these requirements implemented through applicable BMPs.

While site-specific measures vary with conditions such as risk level, proposed grading, and slope/soil characteristics, detailed guidance for construction-related BMPs is provided in the permit and related City standards (as outlined below), as well as additional sources including the EPA *National Menu of Best Management Practices for Storm Water Phase II – Construction* (EPA 2018), and the *Construction Storm Water Best Management Practices Handbook* (California Stormwater Quality Association [CASQA] 2015). Specific requirements for the project under this permit would be determined during SWPPP development, after completion of project plans and application submittal to the State Water Resources Control Board (SWRCB).

National Pollutant Discharge Elimination System Groundwater Permit

Shallow groundwater is expected to occur on site, as previously described. If project-related construction activities entail the discharge of extracted groundwater into receiving waters, the applicant would be required to obtain coverage under the Groundwater Permit. Conformance with this permit is generally applicable to all temporary and certain permanent groundwater discharge activities, with exceptions as noted in the permit fact sheet. Specific requirements for permit conformance include: (1) submittal of appropriate application materials and fees; (2) implementation of pertinent (depending on site-specific conditions) monitoring/testing, disposal alternative, and treatment programs; (3) provision of applicable notification to the associated local agency prior to discharging to a municipal storm drain system; (4) conformance with appropriate effluent standards (as outlined in the permit); and (5) submittal of applicable documentation (e.g., monitoring reports).

Porter-Cologne Water Quality Control Act

The Porter-Cologne Water Quality Control Act established the principal legal and regulatory framework for water quality control in California. This Act is embodied in the California Water Code, which authorizes the SWRCB to implement the provisions of the Federal CWA as previously described. The Porter-Cologne Act also provides for the development and periodic review of water quality control plans that designate beneficial uses for surface waters, groundwater basins, and coastal waters, and establish water quality objectives for applicable waters as outlined below under the *Water Quality Control Plan for the San Diego Basin* heading.

The Porter-Cologne Act establishes the responsibility of the RWQCBs for adopting, implementing, and enforcing water quality control plans, which set forth the state's water quality standards (i.e., beneficial uses of surface waters and groundwater) and the objectives or criteria necessary to protect those beneficial uses. The State of California is divided into nine regions governed by RWQCBs, which implement and enforce provisions of the California Water Code and the CWA under the oversight of the SWRCB. The City is located within the purview of the San Diego RWQCB (Region 9). The Porter-Cologne Act also provides for the development and periodic review of basin plans that designate beneficial uses for surface waters, groundwater basins, and coastal waters, and establish water quality objectives such as those listed for the Miramar Reservoir Hydraulic Area.

5.12.2.3 Local**Drainage Design Manual**

Pursuant to SDMC Chapter 14 Article 2 Division 2, Storm Water Runoff and Drainage Regulations, drainage regulations apply to all development in the City, whether or not a permit or other approval is required. Drainage design policies and procedures for the City are provided in the Drainage Design Manual (City 2017), which is incorporated into the Land Development Manual as Appendix B. The Drainage Design Manual provides design guidelines for drainage and drainage-related facilities

associated with development in the City, including criteria for determining watersheds, storm discharge, and applicable storm drain structure types and capacities.

Storm Water Standards Manual

The City has adopted a jurisdiction-specific Storm Water Standards Manual (City 2018d) to reflect related NPDES standards. The Storm Water Manual provides direction for associated regulatory compliance, including identification of construction and post-construction storm water requirements for Standard Projects and Priority Development Projects, pursuant to the Regional MS4 Permit. Specifically, the manual identifies regulatory requirements and provides detailed performance standards and monitoring/maintenance efforts for: (1) construction BMPs; (2) overall storm water management design; (3) site design (LID) and source control BMPs applicable to all projects; (4) pollutant (or treatment) control and hydromodification management BMPs applicable to Priority Development Projects; (5) operation and maintenance requirements for applicable BMPs; and (6) specific direction and guidance to provide conformance with City and related NPDES storm water standards.

Grading Ordinance

The City Grading Ordinance (SDMC Section 142.0101 et seq.) incorporates a number of requirements related to hydrology and water quality, including BMPs necessary to control storm water pollution from sources such as erosion/sedimentation and construction materials during project construction and operation. Specifically, these include elements related to slope design, erosion/sediment control, revegetation requirements, and material handling/control.

San Diego General Plan

The City of San Diego General Plan provides goals and policies related to hydrology in the Public Facilities, Services, and Safety Element. This element includes a number of goals and policies related to the provision of adequate public facilities and services for existing and proposed development. For storm water, these involve efforts to provide appropriately designed and sized infrastructure and ensure adequate conveyance capacity, protect water quality, and provide conformance with applicable regulatory standards (such as the NPDES).

Mission Valley Community Plan

The Mission Valley Community Plan includes policies, implementing actions, and design guidelines to *address storm water runoff to reduce the potential for flooding, as well as infrastructure design to reduce the impact of storm water runoff when it occurs*. Guidance in the Community Plan includes Policy for Development FSR-1, Implementing Actions IA-90 through IA-94, and Design Guideline DG-65.

5.12.3 Impact Analysis

5.12.3.1 Issue 1 and Issue 2

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

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

Impact Thresholds

Based on the City's CEQA Significance Determination Thresholds, a project could result in a significant impact associated with hydrology if it would:

- *Grade, clear, or grub more than 1.0 acre of land, especially into slopes over a 25 percent grade, and would drain into a sensitive water body or stream, there may be significant impacts on stream hydrology if uncontrolled runoff results in erosion and subsequent sedimentation of downstream water bodies;*
- *Result in modifications to existing drainage patterns, there may be significant impacts on environmental resources such as biological communities, archaeological resources, etc.; and/or*
- *Result in decreased aquifer recharge or result in extraction from an aquifer resulting in a net deficit in the aquifer volume or reduction in the local groundwater table.*

Analysis

Implementation of the project requires grading to allow for the construction of buildings, roadways, a transit station, parking lots, walkways, plazas/courtyards, and park lands, as well as installation of utilities to serve the project. The project would be graded in a phased manner restricted by City rules, regulations, and ordinances; and agency limitations. Grading for the project would consist of approximately 426,400 cy of cut, approximately 1,454,000 cy of fill and import 1,028,000 cy of soil. However, grading would not affect slopes over a 25 percent grade as the project site is generally level.

Buildout of the proposed project would be required to comply with the hydromodification management requirements described in the City's Storm Water Standards Manual. These requirements have been developed to comply with the Regional MS4 Permit, which requires implementation of on-site BMPs to manage hydromodification that may be caused by storm water runoff discharged from a project. By adhering to the requirements of the City's Stormwater Standards Manual, the project would not increase the rate or amount of surface runoff in a manner which would result in substantial erosion or siltation on- or off-site, and impacts would be less than significant. (See also discussion in Section 5.14, *Water Quality*.)

The project would result in a change to the amount of pervious and impervious surfaces, as shown in Table 5.12-1, *Comparison of Pervious and Impervious Surfaces*, associated with redevelopment of a predominately pervious site to one with a combination of impervious and pervious surfaces. The amount of impervious surfaces would increase from approximately 13 acres (or approximately four percent of the project site) to approximately 60 acres (or approximately 20 percent of the project site), leaving the remainder of the site as pervious conditions associated with park development, and open space.

Table 5.12-1. Comparison of Pervious and Impervious Surfaces

Condition	Total Permeable Surface* (acres)	Total Impermeable Surface* (acres)
Existing Condition	160.67	12.97
Proposed Project	113.44	60.19

* Includes project site area, except the San Diego River, MTS (trolley) areas and areas not graded/improved with the project.

The increase in impervious cover is not expected to substantially decrease associated potential groundwater recharge capacity, because approximately 80 percent would be available for infiltration/recharge capacity. The project would not result in decreased aquifer recharge or result in extraction from an aquifer resulting in a net deficit in the aquifer volume or reduction in the local groundwater table.

A dual storm drain system would be constructed on-site. One system would primarily convey storm runoff from the development pads, while the other would primarily convey street and runoff from adjacent areas to the San Diego River. The off-site runoff would not commingle with the on-site runoff until the on-site runoff is treated. The project runoff would be treated by biofiltration basins or compact biofiltration BMPs (e.g., Modular Wetland System Linear or equivalent) before discharging towards the San Diego River. The site was divided into five major basins, 100 to 500, which reflect the five primary discharge areas. The 100-year flow rates for each basin area as follows Basin 100 184 cubic feet per second (cfs); Basin 200 70 cfs, Basin 300 166 cfs, Basin 400 12 cfs and Basin 500 43 cfs. The total for all basins is 475 cfs. These results indicate that the flow rates are of a magnitude that can be conveyed by standard drainage facilities. The proposed drainage facilities would adequately control and convey storm water runoff.

Significance of Impacts

Construction of the project would grade more than 1.0 acre of land and introduce new impervious surfaces beyond what currently exists. However, the project would be designed consistent with all applicable regulations. With adherence to applicable regulations, the project would not affect the rate or volume of surface runoff, groundwater recharge capacity, nor would the project result in impacts to sensitive biological and archaeological resources. Impacts would be less than significant.

The project would result in an increase in impervious surfaces from what exists currently. However, the project would construct a storm drain system to handle project runoff. In addition, improvements to the Fashion Valley Road culverts would increase flow conveyance at the crossing. No significant impacts associated with drainage and runoff would result.

Mitigation Measures

Mitigation would not be required.

5.12.3.2 Issue 3

Issue 3 Would the project develop wholly or partially within a 100-year floodplain as identified on a FEMA map and impose flood hazards on other upstream or downstream properties?

Impact Threshold

Based on the City's CEQA Significance Determination Thresholds, a project could result in a significant impact associated with hydrology if it would:

- *Result in increased flooding on- or off-site, that may result in significant impacts on upstream or downstream properties and to environmental resources.*
- *Impose flood hazards on other properties or development or be proposed to develop wholly or partially within the 100-year floodplain identified on the FEMA maps.*

Analysis

As shown in Figure 5.12-1, *Project Site's Location in Relation to Special Flood Hazard Zone*, the project site is located within the 100-year floodplain of the San Diego River. The majority of the project site is located within Zone AE (100-year) floodplain of the San Diego River based on FEMA FIRM. The project would encroach into the floodplain and floodway.

Portions of the mixed-use development and the park are within portions of the floodplain and floodway. (See Figure 5.12-1, *Project Site's Location in Relation to Special Flood Hazard Zone*.) The project would be required to adhere to the City's Municipal Code, which outlines the local regulations for floodplain and floodway encroachments. LDC Section 143.0146(a)(7) states that floodway encroachments including fill, new construction, modifications, and other development are prohibited unless a registered engineer certifies that the encroachments will not increase the base flood (100-year water surface) levels (a "no-rise" condition). LDC Section 143.0146(c)(6) requires new construction or substantial improvement of any structure to have the lower floor elevated at least two feet above the base flood elevation, i.e., two feet of freeboard over the 100-year water surface elevations.

The project would avoid significant impacts to hydrology by increasing conveyance within the proposed Riverwalk River Park. The Riverwalk River Park would be widened and/or lowered to

provide the offset of water surface impacts from floodplain and floodway encroachments. Additionally, the project would increase conveyance of floodwaters at Fashion Valley Road. The current crossing contains six 60-inch reinforced concrete pipes. The project would replace the existing drainage facility with an arch culvert. In conjunction with the improvements to Fashion Valley Road, automated gates would be installed adjacent to the road to restrict traffic when the river reaches the level at which it crosses over the roadway. The gates would be connected to sensors in the river, which would measure the water level and would trigger the gates to close Fashion Valley Road to traffic, across the culvert, in a north and south direction.

As shown in Table 5.12-1, comparison of the existing and proposed condition shows that the proposed grading would not increase the 100-year water surface elevations; therefore, no rise would result. In addition, the water surface elevations upstream of Fashion Valley Road are lowered due to the proposed arch culvert. Because the San Diego River is under subcritical flow, changes at a given location would impact only the upstream water surface elevations, not downstream. As a result, the off-site water surface elevations downstream of the project would not be altered or affected by the project. Table 5.12-2, *Comparison of 100-Year Water Surface Elevations*, shows that the upstream water surface elevations would be benefited (lowered) by the project, because the project causes a decrease just upstream of Fashion Valley Road. Ultimately, the upstream water surface elevations resulting from the project would match existing conditions.

The current site conditions include two golf cart/pedestrian bridge crossings. These two crossings in conjunction with the Fashion Valley Road crossing, were analyzed to estimate the capacity of the three crossings. The resultant hydraulic analysis shows that the westerly golf course bridge can convey about 10,000 cfs under proposed conditions before water reaches the low end of the bridge, or just over the 30-year event. The easterly golf course bridge can convey about 20,000 cfs under proposed conditions before water reaches the low end of the bridge, or about the 60-year event. The proposed Fashion Valley Road culvert can convey about 4,000 cfs before overtopping the road or about the 12-year event. Floor elevations of any building must be two feet above the 100-year frequency flood elevation. The project proposes import of fill material to raise building finished floor elevations to at least two feet above the 100-year floodplain. As a result of the project, upstream water surface elevation would be benefited (lowered) since the project causes a decrease just upstream of Fashion Valley Road.

The upstream water surface elevations resulting from the project would match existing conditions and would not impact environmental resources. Implementation of the project would not result in significant and unavoidable flooding impacts.

Table 5.12-2. Comparison of 100-Year Water Surface Elevations

River Station	Existing 100-Year Water Surface Elevations, feet	Proposed Concept 100-Year Water Surface Elevations, feet	Proposed - Existing, feet
28331	30.79	30.46	-0.33
28300	Fashion Valley Road		
28269	29.64	29.18	-0.46
28244	29.74	29.31	-0.43
28164	28.77	28.65	-0.12
28064	28.80	28.44	-0.36
27929	28.75	28.25	-0.50
27759	28.63	27.97	-0.66
27589	28.51	27.98	-0.53
27429	28.33	27.96	-0.37
27259	28.25	27.89	-0.36
27069	28.02	27.60	-0.42
26951	27.96	27.36	-0.60
Easterly Golf Course Bridge			
26937	27.95	27.33	-0.62
26799	27.70	27.16	-0.54
26614	27.50	26.94	-0.56
26379	27.06	26.56	-0.50
26174	26.92	26.34	-0.58
25914	26.78	26.26	-0.52
25654	26.37	26.20	-0.27
25354	26.37	26.14	-0.23
25181	26.27	26.09	-0.18
25001	26.14	26.01	-0.13
24804	26.06	25.97	-0.09
Westerly Golf Course Bridge			
24790	26.03	25.96	-0.07
24581	25.75	25.73	-0.02
24401	25.31	25.28	-0.03
24226	24.98	24.98	0.00
24019	24.62	24.62	0.00
23800	24.21	24.21	0.00
23796	24.13	24.13	0.00
23650	24.17	24.17	0.00
23636	24.05	24.05	0.00
23470	23.78	23.78	0.00
23461	23.76	23.76	0.00
23220	23.60	23.60	0.00
23210	23.17	23.17	0.00
23200	23.00	23.00	0.00
23171	22.60	22.60	0.00
22880	22.36	22.36	0.00
22870	22.53	22.53	0.00
22860	22.08	22.08	0.00
22850	22.15	22.15	0.00

A CLOMR would be required to be submitted to FEMA after following discretionary action taken on the project to show the proposed floodplain and floodway of the project site. As stated above, As shown in Table 5.12-1, comparison of the existing and proposed condition shows that the proposed grading would not increase the 100-year water surface elevations; therefore, no rise would result.

Building finished floor elevation would be two feet above the 100-year floodplain. No impacts would result.

Significance of Impacts

The project would not result in increased flooding on- or off-site and would not cause significant impacts on upstream or downstream properties or to environmental resources. The project would not impose flood hazards on other properties or development. No impacts would occur on any properties or environmental resources surrounding the project site. No mitigation would be required.

Mitigation Measures

Mitigation would not be required.

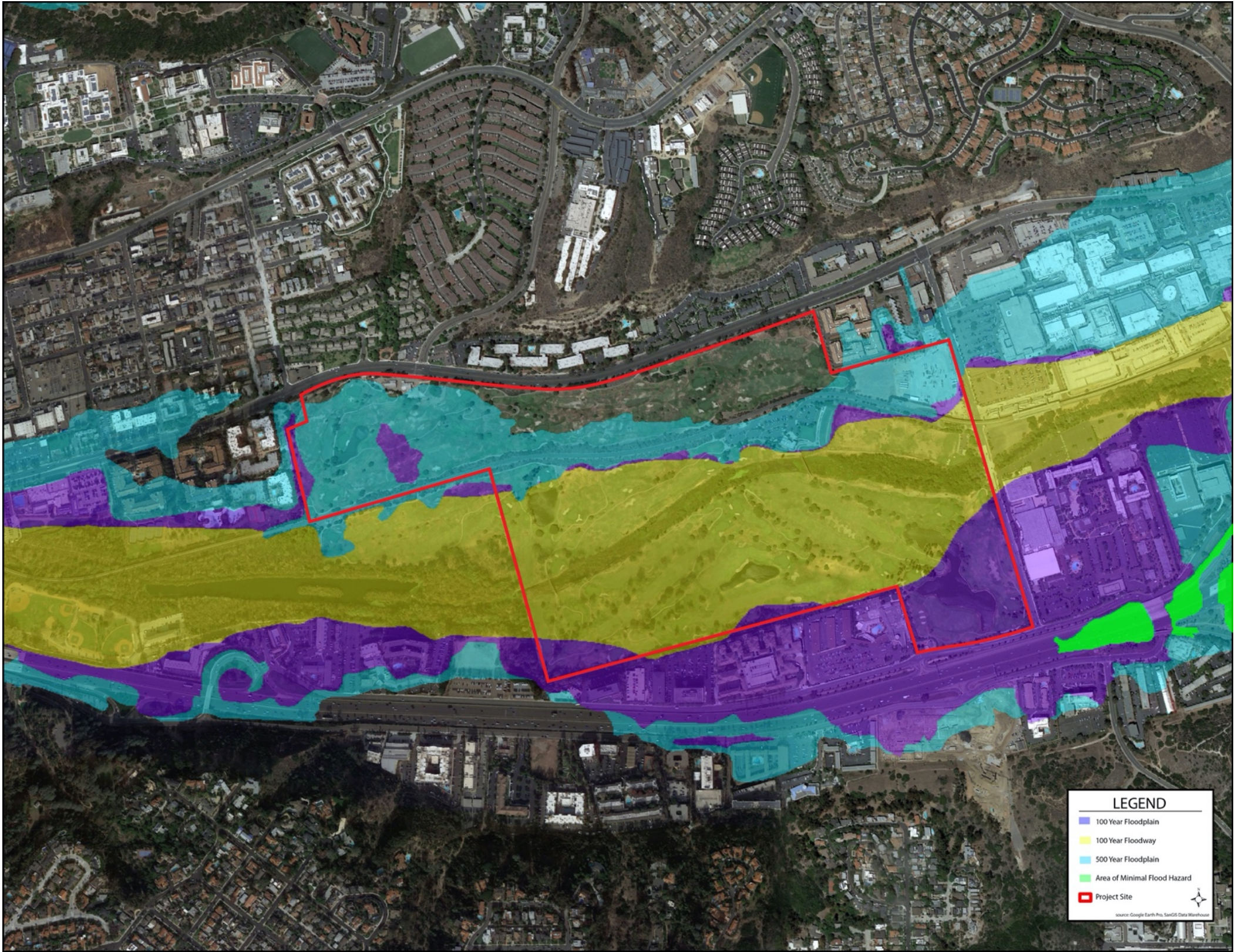


Figure 5.12-1 Project Site's Location in Relation to Special Flood Hazard Zone

5.13 Public Utilities

This section evaluates the potential public utilities impacts associated with the project. The following discussion is based on the *Water Supply Assessment* prepared by the Public Utilities Department (April 2019); *Waste Management Plan* prepared by KLR Planning (March 2020); *Water Study* prepared by West Coast Civil (February 3, 2020); and *Sewer Study* prepared by Project Design Consultants, Inc. (April 2020). These documents are included as Appendix P, Appendix Q, Appendix R, and Appendix S, respectively.

5.13.1 Existing Conditions

Public utilities are functions and facilities that serve residents on a community-wide basis. Public utilities are generally provided to an area based on population, although each public utility provider has their own set of service standards. The City provides the project site with water supplies, wastewater treatment services, and solid waste management services, as detailed below.

5.13.1.1 Water

Water Facilities

Water service to the project site is provided by the City's Public Utilities Department (PUD). The PUD serves nearly 1.3 million people populating over 200 square miles of developed land, with average deliveries of 200 million gallons per day (mgd). The PUD maintains a complex water system that includes nine surface reservoirs, three drinking water treatment plants, 29 treated water storage facilities, 49 pump stations, and approximately 3,302 miles of water transmission and distribution pipelines (City 2018a). Potable water lines in the project area are located within public right-of-way; specifically, eight-inch and 12-inch water lines are located in Friars Road north of the plan area, a 16-inch water line is located in Fashion Valley Road east of the plan area, and an eight-inch water line is located in Hotel Circle North just south of the plan area. The project site is located in the City's 390 HGL Pressure Zone.

The PUD has developed a separate recycled water system to offset the demand for potable water. The goal is to reduce the City's dependence on imported water and increase reliability by providing non-potable water supplies. Recycled water service is available through the North City Water Reclamation Plant (northern service area) and the South Bay Water Reclamation Plant (southern service area). Recycled water is approved for use in some construction activities, recreational water bodies, and the irrigation of parks, playgrounds, schoolyards, residential landscaping, common areas, nurseries, freeway landscaping, golf courses, dual plumbed-uses, and cooling towers. Customers can purchase recycled water for approved uses if they are fronting an existing recycled water distribution pipeline. The City's Ordinance 0-17327 also supports feasible use of recycled water for new Developments. There are no recycled water distribution lines in the vicinity of the project site as indicated in Figure 5.13-1, *Recycled Water Availability*.

Water Supply

The City's PUD serves the area within its incorporated boundaries on a retail basis for treated water, imports the majority of its raw water from the San Diego County Water Authority (SDCWA), and is a limited wholesaler to neighboring agencies. The SDCWA is recognized as the lead agency for procuring imported water to meet the present and long-term needs of the City and the San Diego region. The SDCWA purchases much of its water from the Metropolitan Water District (MWD). As a member agency of SDCWA, the City of San Diego assists SDCWA as needed in working with the MWD, the State Department of Water Resources (DWR), the County of San Diego, other local water agencies, and the private sector in efforts to satisfy the future water supplies and demands of the region. Below is a summary of these water supply sources.

Metropolitan Water District

MWD is a consortium of 26 cities and water districts that provides imported water to nearly 19 million people in parts of Los Angeles, Orange, San Diego, Riverside, San Bernardino, and Ventura counties. MWD currently delivers an average of 1.5 billion gallons of water per day to a 5,200-square-mile service area. MWD imports its water from two main sources: the Colorado River [via the Colorado River Aqueduct (CRA) and the Sacramento and San Joaquin Rivers (via the State Water Project (SWP))]. Together, these two sources provide approximately 45 percent of Southern California's water; the remainder comes from various local sources. The CRA is owned and operated by MWD, and extends approximately 242 miles from the Colorado River at Lake Havasu to Lake Mathews in Riverside County. From there, a series of canals, siphons, pipelines, and pump stations moves water west to several MWD reservoirs for local distribution. The principal structure conveying water south through the SWP is the California Aqueduct, which extends approximately 444 miles south from the Sacramento-San Joaquin Delta to Lake Perris in Riverside County. Additional water sources currently or potentially available to MWD include local supplies, groundwater banking, water transfers, seawater desalination, and water recycling.

San Diego County Water Authority

The SDCWA is an independent public agency that serves as a wholesale water supplier to its 24 member agencies. The SDCWA supplies approximately 95 percent of the population of San Diego County, in a service area of 952,208 acres. The SDCWA operates and maintains a regional water delivery system capable of delivering more than 900 mgd of water. This system consists of two major aqueducts and numerous related facilities, including approximately 300 miles of pipeline and over 100 flow control facilities.

MWD is SDCWA's largest supplier, but SDCWA has pursued strategies over the last two decades to diversify San Diego's regional water supply portfolio and reduce the region's dependence on water deliveries from MWD, including through purchases from the Imperial Irrigation District (IID) and development of the Carlsbad Desalination Plant. In 1998, the SDCWA entered into a water conservation and transfer agreement with the IID, an agricultural district in neighboring Imperial County that receives Colorado River water. The agreement gave SDCWA a higher priority water right

to Colorado River water, and includes strategies to provide SDCWA with a larger share of Colorado River water. These strategies involve voluntary conservation measures by Imperial Valley farmers, a canal lining project on the All American and Coachella Canals, and the transfer of water conserved by these measures directly to SDCWA. This agreement, along with amendments related to the 2003 Quantification Settlement Agreement, is expected to provide over 40 percent of the region's water supply by 2020. In addition to developing its own regional supplies of water, SDCWA has also encouraged the development of additional local water supply projects, such as water recycling and groundwater projects.

In December 2015, SDCWA added desalinated water to its supply portfolio, with the completion of a seawater desalination facility capable of providing 50 mgd of potable water. SDCWA purchases up to 56,000 AFY of desalinated water from the Carlsbad Desalination Plant for their direct use or use by identified member agencies.

By 2013, SDCWA had reduced its dependency on MWD water purchases from 95 percent to 45 percent (SDCWA 2016c). SDCWA continues to pursue strategies for water supply diversification and reliability, such as additional seawater desalination projects, groundwater utilization, increased recycled water use, and the recent dam raise on the San Vicente Reservoir, which doubled its storage capacity. By 2020, SDCWA intends to increase local water resources to approximately 36 percent of total supply.

In coordination with its 24 member agencies, the SDCWA developed its most recent Urban Water Management Plan (UWMP) to demonstrate regional water supply reliability over the next 25 years (2015 to 2040). Main components of the plan are the baseline demand forecasts under varying future climate conditions, conservation savings estimates, water demand projections, a water supply assessment for the region, supply reliability analysis, and scenario planning. The SDCWA UWMP also includes water demand associated with accelerated forecasted residential development as part of its municipal and industrial sector demand projections. These housing units were identified by SANDAG's land use plan in the course of its RHNA update, but are not yet included in existing general land use plans of local jurisdictions. This Accelerated Forecasted Growth (AFG) is intended to account for growth that was originally anticipated to occur between 2040 and 2050, but has the likely potential to occur on an accelerated schedule. The AFG is an additional demand increment that can be used to confirm that water demands would be met for some development projects that are not currently identified in general land use plans.

City of San Diego Public Utilities Department

In June 2016, the City issued its most recent UWMP, which outlines current and future water supplies and demands in the City's service area. The City is engaged in several strategies to increase water reliability, including the development of local groundwater supplies; increased utilization of recycled water, or potable reuse; continued conservation efforts; and ongoing strategic water resources planning. The UWMP projects water supply reliability for average years, single dry years, and multiple dry years, and concludes that the PUD will have sufficient water supplies to serve the

City through the year 2040 (City 2016f). PUD and interim supply and demand forecast tracking in 2018 also support a reduction in 2015 UWMP projected demands as a possible result of less water consumption than what was originally projected.

Conservation

In addition, the PUD emphasizes the importance of water conservation to minimize water demand and avoid excessive water use. The Water Conservation Program implemented by the PUD aims to reduce water use in San Diego by offering various rebate programs, landscaping classes, education, and free water conservation surveys for property owners and tenants. These programs are credited with achieving over 32.2 mgd of potable water savings (City 2015b). Depending on conditions, these savings can account for as much as 20 percent of raw water purchases annually. Water conservation continues to be a priority throughout California, and water suppliers are tasked with adopting programs and policies designed to promote water conservation practices and implementing comprehensive public information and educational campaigns.

The City's General Plan includes The Conservation Element (CE), Public Facilities, Services and Safety Element (PF-H) and Housing Element (HE). These Elements present respective water resource, climate change adaptation, sustainability, water efficiency and conservation policies and goals. Examples include policies that call for drought resistant landscaping, optimization of the use of imported water supplies and improve reliability by increasing alternative sources (PF-H.1), and the long-range planning and integrated management of groundwater and surface water resources and protecting those resources by implementing guidelines for future development (CE-D-2).

The City's Climate Action Plan and Community Plans consider adaptive strategies that include consideration of the water-energy nexus, City per capita reduction goals, City water supply choices and sustainability of water supply and services.

5.13.1.2 Wastewater

Wastewater treatment service is provided by the PUD, which operates the Metropolitan Sewerage System (Metro System). Facilities in the Metro System include the Point Loma Wastewater Treatment Facility, ocean outfall pipes, pump stations, interconnecting interceptor sewers, and the North City and South Bay Water Reclamation Plants. The Metro System provides wastewater transportation, treatment, and disposal services to the San Diego region. The system serves a population of 2.0 million from 16 cities and districts generating approximately 190 mgd of wastewater. Planned improvements to the existing facilities will increase wastewater treatment capacity to serve an estimated population of 2.9 million through the year 2050.

In the project site vicinity there are two sewer lines that convey flow to the 78-inch North Mission Valley Trunk Sewer. A 15-inch line exists on-site that conveys flow to the west. Off-site, 24-inch line in Fashion Valley Road that conveys wastewater to the south after it receives flow from off-site

developments near the intersection of Friars Road and Fashion Valley Road. A 15-inch line off-site near the western portion of the site is currently not in use. All three sewer lines connect to the 78-inch North Mission Valley Trunk Sewer. A private sewer lateral servicing the golf course restroom is located near the southwest corner of the project site and conveys flow to the south. This private lateral connects to the 27-inch Mission Valley Trunk Sewer that passes east to west through the southwest corner of the project site.

5.13.1.3 Solid Waste

Solid waste management in the project area is provided by the City Environmental Services Department (ESD) and private collectors. The City provides refuse collection for residences located on dedicated public streets, provide adequate safe space and access for storage collection, and comply with regulations set forth in the San Diego Municipal Code. Other customers pay for services by City franchised private hauling companies.

City of San Diego ESD pursues waste management strategies that emphasize waste reduction and recycling, composting, and environmentally-sound landfill management to meet the City's long-term management needs.

Refuse collected from the area is generally taken to the Miramar Landfill, located just north of SR 52, between I-805 and SR 163. According to the Solid Waste Information System (SWIS) database maintained by CalRecycle, the Miramar Landfill had a remaining capacity of approximately 15,527,878 cy of solid waste as of June 30, 2014. Based on the remaining capacity and disposal rates, the Miramar Landfill is expected to close August 31, 2025 (CalRecycle 2018); however, the amount of waste managed at the landfill is expected to decrease while the amount of composting and recycling will increase over time as the City strives to achieve the target 75 percent diversion rate identified in the City's Zero Waste Plan.

Currently, only two other landfills provide disposal capacity within the urbanized region of San Diego: the Sycamore and Otay Landfills. The Sycamore Landfill contains 349 disposal acres on a 491-acre site and is located to the east of Miramar, within the City of San Diego's boundaries. The Otay Landfill contains 230 disposal acres on a 464-acre site and is located within an unincorporated island of County land in the City of Chula Vista. The Sycamore and Otay Landfills are privately owned by Allied Waste Industries, Inc. The Sycamore Landfill is permitted to receive a maximum of 8,000 tons per day. The remaining capacity as of December 31, 2016 was 113,972,637 cy. This landfill is projected to cease operation on December 31, 2042. The Otay Landfill is permitted to receive 6,700 tons per day. It has a remaining capacity of 21,194,008 cy as of May 31, 2016. It is estimated that the Otay Landfill will cease operation on February 28, 2030.

5.13.2 Regulatory Framework

5.13.2.1 State

California Assembly Bill 1881

AB 1881, the Water Conservation in Landscaping Act of 2006, requires the DWR to prepare an updated Model Water Efficient Landscaping Ordinance (Model Ordinance) in accordance with specified requirements to conserve water through efficient irrigation and landscaping. By January 1, 2010, local agencies were to adopt either the updated Model Ordinance or a local landscape ordinance that is at least as effective in conserving water as the Model Ordinance. Pursuant to state law, the City amended its Landscape Regulations (SDMC Chapter 14, Article 2, Division 4) and Landscape Standards in April 2016 to expand water conservation in landscaping. The Landscape Standards implement the requirements of the Landscape Regulations. All landscape plans and installations are required to be in compliance with the Landscape Standards.

Integrated Waste Management Act

The State of California Integrated Waste Management Act (IWMA) of 1989 [California AB 939], which is administered by CalRecycle, requires counties to develop an Integrated Waste Management Plan (IWMP) that describes local waste diversion and disposal conditions, and lays out realistic programs to achieve the waste diversion goals. IWMPs compile Source Reduction and Recycling Elements (SRREs) that are required to be prepared by each local government, including cities. SRREs analyze the local waste stream to determine where to focus diversion efforts, and provide a framework to meet waste reduction mandates. The goal of the solid waste management efforts is not to increase recycling, but to decrease the amount of waste entering landfills. AB 939 required all cities and counties to divert a minimum 50 percent of all solid waste from landfill disposal. In 2011, the State legislature enacted AB 341 (PRC Section 42649.2), increasing the diversion target to 75 percent statewide. AB 341 also requires the provision of recycling service to commercial and residential facilities that generate four cubic yards or more of solid waste per week.

AB 1826

In October 2014, Governor Brown signed AB 1826, Chesbro (Chapter 727, Statutes of 2014), which requires businesses to recycle their organic waste on and after April 1, 2016, depending on the amount of waste they generate per week. Organic waste means food waste, green waste, landscape and pruning waste, nonhazardous wood waste, and food-soiled paper waste that is mixed in with food waste. For businesses that generate eight or more cy of organic waste per week, this requirement began April 1, 2016, while those that generate four cy of organic waste per week must have an organic waste recycling program in place beginning January 1, 2017. This law also requires that on and after January 1, 2016, local jurisdictions across the state implement an organic waste recycling program to divert organic waste generated by businesses, including multi-family residential dwellings that consist of five or more units. Mandatory recycling of commercial organics would be phased in over time, and an exemption process is available for rural counties.

As of January 1, 2019, changes to AB 1826 require more sites to have organics collection service. Businesses and institutions that generate four or more cubic yards of solid waste per week must have organics collection service. Materials that must be composted include food waste, green waste, landscape and pruning waste, non-hazardous wood waste, and food-soiled paper.

California Urban Water Management Act

As part of this Act, UWMPs are prepared, adopted, and administered by urban water suppliers and submitted to the California Department of Water Resources. These plans support the suppliers' long-term resource planning to ensure that adequate water supplies are available to meet existing and future water needs over a 20-year planning time-frame. The plans describe and evaluate sources of supply, reasonable and practical efficient uses, reclamation, and demand management activities. Within UWMPs, urban water suppliers must assess the reliability of water sources over a 20-year planning time frame, describe demand management measures and water shortage contingency plans.

Senate Bill 610 Water Supply Assessment

The SB 610 Water Supply Assessment (SB 610 WSA) is intended to be internally consistent with the Urban Water Management Plan and applicable City General Plan Elements. WSAs are intended to closely link the demands of a set of proposed land uses contained in a proposed project with the water supplies available for that development and evaluate cumulative demands in the water service area. The standard for the certainty and reliability of water supplies sufficient to meet the demands of the proposed development is more exacting than that required for the Urban Water Management Plan; a foundational document to the SB 610 WSA.

Ultimately, because the SB 610 WSA is a source document for an EIR prepared for a proposed project pursuant to CEQA, it must provide detailed evidence showing that sufficient water will be available to meet water demands for the water purveyor's existing and planned land uses over a 20-year planning horizon, including single and multiple dry years, provide a discussion of increased demands and may evaluate practical efficient use of alternative water sources. The types of projects subject to SB 610 are the following:

- Residential developments of more than 500 units;
- Shopping centers or businesses employing more than 1,000 people or having more than 500,000 SF of floor space;
- Commercial office buildings employing more than 1,000 people or having more than 250,000 SF of floor space;
- Hotels or motels having more than 500 rooms;
- Industrial, manufacturing, or processing plants or industrial parks planned to house more than 1,000 people or having more than 650,000 SF of floor space;
- Mixed-use projects that include one or more of the above types of projects; and
- Projects that would demand an amount of water equivalent to, or greater than, the amount

of water required by a 500-du project.

5.13.2.2 Local

Drought Restrictions

In July 2016, the City moved from a Level 2 Drought Alert to a Level 1 Drought Watch, lifting some of the water-use restrictions that were put in place to mitigate the multi-year drought that California had been experiencing. A Level 1 Drought Watch includes voluntary water-use restrictions that limit landscape watering and the washing of mobile equipment. Additionally, permanent mandatory water use restrictions are in place, with the goal of promoting water conservation as a way of life in San Diego.

City of San Diego Comprehensive Policy for a Sustainable Water Supply (CP 400-15)

CP 400-15 includes policies to assure an adequate water supply for the City. For example, it is the policy of the City Council to:

- Support economically sound activities that create an affordable and reliable water supply to attract, retain and expand business, and promote an excellent quality of life for residents.
- Support decisions that are aligned with the City's Urban Water Management Plan and the Conservation Element of the City's General Plan.
- Support the use of Water Supply Assessments related to land-use decisions.
- Support and encourage low-water use plumbing, landscaping and irrigation materials in public and private development.
- Support economically sound activities that reduce the City's reliance on imported sources of water and increase local supplies.
- Support the economically sound development of a diverse portfolio of local water supplies to meet the City's present and future needs.
- Support cost-effective programs to recharge, protect and improve the yield from local and regional groundwater basins.

San Diego Municipal Code 147.04 (Plumbing Retrofit Upon Re-Sale Ordinance)

This ordinance requires that all buildings, prior to a change in property ownership, be certified as having water-conserving plumbing fixtures in place. All residential, commercial and industrial water customers who receive water service from the City of San Diego Public Utilities Department are affected by this ordinance.

City of San Diego Ordinance 0-17327 (Mandatory Water Reuse Ordinance)

This ordinance, adopted by the City Council in 1989, requires that "recycled water shall be used within the City where feasible and consistent with the legal requirements, preservation of public health, safety, and welfare, and the environment." All development projects are required to install an

additional water pipeline reserved for reclaimed water, based on the project's location within an existing or proposed recycled water service area. Compliance with this ordinance for new development is made a condition of tentative maps, land use permits, etc. Furthermore, it is the policy of the City that use of potable water for non-domestic uses shall be contrary to the City policy and shall not be considered the most beneficial use of a natural resource and shall be avoided to the maximum extent possible (City of San Diego Rules and Regulations for Recycled Water Systems, June 2016).

Zero Waste Plan

The City's Zero Waste Plan, a component of the City's CAP, was approved and adopted by the City Council on July 13, 2015. The Zero Waste Plan lays out strategies to be implemented by the City to accomplish the following goals:

- Target 75 percent diversion by 2020, 90 percent diversion by 2035, and "zero waste" by 2040 by identifying potential diversion strategies for future action. To increase the City's waste diversion rate to 75 percent will require an estimated additional 332,000 tons per year to be diverted from landfill disposal;
- Demonstrate continuous improvement towards a goal of zero waste to landfills;
- Emphasize education by renewing City public information efforts;
- Promote local policies and ordinances and legislation at the state level that encourage manufacturers, consumers, and waste producers to be responsible for waste;
- Investigate appropriate new technologies; and
- Re-emphasize market development at the local and State level.

The City's ESD estimates that compliance with existing City codes and ordinances alone (including the Refuse and Recyclable Materials Storage Regulations [SDMC Chapter 14, Article 2, Division 8], Recycling Ordinance [SDMC Chapter 6, Article 6, Division 7], and the Construction and Demolition Debris Deposit Ordinance [SDMC Chapter 6, Article 6, Division 6]) would achieve only an approximate 40 percent diversion rate, which is substantially below the current 75 percent diversion level targeted by the state and the goals of the City's Zero Waste Plan.

The Recycling Ordinance requires all single-family, multi-family, and commercial uses to participate in a recycling program by separating recyclable materials from other solid waste and depositing the recyclable materials in the approved recycling containers. The Construction and Demolition Debris Deposit Ordinance requires project applicants to submit a Waste Management Form with the building permit or demolition/removal permit, to provide a general estimate of the total waste generated by the project including how much will be recycled. The code requires a minimum diversion rate of 50 percent for building permits or demolition/removal permits issued within 180 calendar days of the effective date of the ordinance, and a minimum diversion rate of 75 percent for building permits or demolition/removal permits issued after 180 calendar days from the effective date of the ordinance, provided that a certified recycling facility which accepts mixed construction and demolition debris is operating within 25 miles of the City Administrative Building.

5.13.3 Impact Analysis

5.13.3.1 Issue 1

Issue 1 Would the project result in the need for new systems, or require substantial alterations to existing utilities, the construction of which would create physical impacts with regard to the following utilities: water, sewer, and solid waste disposal?

Impact threshold

Based on the City's Significance Determination Thresholds, impact analysis of public utilities should focus on the physical impacts associated with the construction or expansion of existing utilities. Impacts to public utilities would be significant if the removal, construction, and/or relocation of the utility would:

- Result in direct impacts from the construction of new or expanded public utilities needed to serve the project, and/or
- Construct, demolish, or renovate *1,000,000 square feet or more of building space, which would generate approximately 1,500 tons or more of waste. For projects over 1,000,000 square feet, a significant impact would result if compliance with the City's waste management ordinances, and the Waste Management Plan fail[s] to reduce impacts of such projects to below a level of significance and/or if a Waste Management Plan for the project is not prepared and conceptually approved by ESD prior to distribution of the draft environmental document for public review.*

Additionally, the City's Significance Determination Thresholds note the following guidance should be considered in determining whether the utility work could have significant environmental impacts.

Would removal, construction, and/or relocation of the utility:

- *Be compatible with existing and adjacent land uses?*
- *Change drainage or affect water quality/runoff?*
- *Affect air quality?*
- *Affect biological resources including habitat? Consider access road locations.*
- *Have a negative aesthetic effect? Visual simulations might be necessary.*
- *Impact historical resources?*
- *Increase noise levels to sensitive receptors?*

Analysis

Water

The project is located within an urbanized area in the Mission Valley community. As such, water facilities have been installed to serve existing on-site uses and adjacent areas. To determine the appropriate water system design based on required capacity, the water demands associated with

the Specific Plan were developed by the PUD in accordance with the City's Design Guidelines and Standards. Residential water demand was estimated based on residential housing type, commercial square footage and park water demand (see Section 5.13.3.2, Issue 2 and Issue 3, for detail).

The proposed new water lines and connections to the City water system as described in the project's Water Study (February 2020) are represented in Figure 5.13-2, *Proposed Water System Modifications*, and were assessed by the City for conformance to the City's Facility Design Guidelines, the California Fire Code, and PUD level of service requirements. The Water Study determined pipeline sizes for the public water system only. Private development water systems would be developed for each lot and submitted as part of individual site plan development. . The proposed on-site water system would be provided through multiple connections to the existing water system and would accommodate the Specific Plan's demand. The proposed 16-inch diameter northern loop would have four connections to the existing 16-inch diameter main in Friars Road and one connection to the existing 16-inch diameter main on Fashion Valley Road. The proposed 12-inch diameter southern loop would have one connection to the existing 16-inch main in Fashion Valley Road and one connection to the existing eight-inch water main in Hotel Circle North. Domestic water would be provided for each lot off the proposed public mains with metered connections, back flow prevention, and private service mains. Construction of water facilities to serve the project would be subject to standard industry measures and the SDMC. The physical construction of these facilities has been analyzed within the various sections of this EIR, as all facilities would be a part of the project's proposed grading and construction plans.

Development of the Specific Plan would not trigger the need for new water facilities or the expansion of those facilities beyond what is proposed for the project. Adequate services are available to serve the project. Impacts would be less than significant.

Wastewater

The project proposes four POCs to the existing sewer system as shown in Figure 5.13-3, *Proposed Sewer System* which would allow. for four independent sewer systems. The first POC would connect to the northern unused off-site 15-inch line stub out near the western portion of the project site. Upstream of POC 1 are proposed public 12-inch and 10-inch sewer lines that make up the first sewer system (SYSTEM 1). SYSTEM 1 would convey sewage for 20 separate lots compromised of residential, retail, and employment space with a cumulative total population served of 4,507.

POC 2 would connect to the off-site 24-inch line in Fashion Valley Road. Upstream of POC 2 are proposed 10-inch sewer lines that make up the second sewer system (SYSTEM 2). SYSTEM 2 would convey sewage for two separate lots compromised of residential areas with a cumulative total population served of 1,005.

POC 3 would connect to the southern unused off-site 15-inch line stub out near the western portion of the project site. Upstream of POC 3 are proposed 10-inch sewer lines that make up the third

sewer system (SYSTEM 3). SYSTEM 3 would convey sewage for six separate lots comprised of residential and retail space with a cumulative total population served of 1,471.

POC 4 would connect to the 78-inch North Mission Valley Trunk Sewer in an off-site existing manhole in Fashion Valley Road. Ten-inch sewer lines upstream of POC 4 make up the fourth sewer system (SYSTEM 4). SYSTEM 4 would convey sewage for 26 separate lots comprised of residential, retail, and employment space, in addition to the future park facilities, with a cumulative total population served of 3,586.

The project's sewer system has been designed in conformance with the City's Sewer Design Guide. The project would result in a reduction of the projected peak sewer flow-rate due to a change in the uses on the project site. Construction of wastewater facilities to serve the project would be subject to standard industry measures and the SDMC. The physical construction of these facilities has been analyzed within the various sections of this EIR, as all facilities would be a part of the project's proposed grading and construction plans.

The City has determined that it has adequate wastewater treatment capacity to serve the project. The existing facilities available to serve the project site were determined to be acceptable; in addition, the treatment facility has remaining capacity. Therefore, no new facilities would be needed to serve the project. Subsequently, the project would not adversely affect existing wastewater treatment services and adequate services are available to serve the project without requiring new or expanded entitlements. The project would result in less than significant impacts.

Solid Waste

The Waste Management Plan (WMP) prepared for the project pursuant to the City's Significance Determination Thresholds. Provided below is a discussion of solid waste generation associated with construction and operation of the project. There would be no export of material during grading operations. Therefore, no waste materials (earth) would be required to be disposed of as a result on project grading operations.

Construction

Construction for the project would occur over an extended period of time (approximately 20 years). Construction activities would generate packaging materials and unpainted wood, including wood pallets, and other miscellaneous debris. Construction debris would be separated on-site into material-specific containers to facilitate reuse and recycling and to increase the efficiency of waste reclamation. The types of construction waste anticipated to be generated that could be marketable include:

- Inert granule products (asphalt and concrete)
- Wood waste products
- Ferrous metals

Management of construction material and recycling would adhere to industry standards such that refuse that cannot be reused or recycled is disposed of at appropriate facilities. Provided below is a list of general procedures which would be implemented such that 75 percent of construction waste, in accordance with AB 341 and current City diversion targets for project-specific waste management plans, would be diverted from disposal in landfills in accordance with City requirements.

- Determine recycling, salvage, reuse, and disposal options before the job begins.
- Donate materials that can be reused to charities and nonprofit agencies.
- Choose refuse haulers based on their responsiveness to the projects recycling plan.
- Choose a recycling facility, such as Miramar Landfill, based on its fees, geographic proximity to the project site, and diversion rate.
- Solid waste management coordinator would be responsible for educating contractors and subcontractors regarding waste management plan requirements.
- Clearly identify recycling areas with large bilingual signs.
- Place recycling bins in areas that would minimize misuse or contamination by employees and the public.

To facilitate management of construction materials, as individual developments come forward, the developer shall identify one person or agency connected with the proposed development to act as Solid Waste Management Coordinator, whose responsibility it becomes to work with all contractors and subcontractors to ensure material separation and coordinate proper disposal and diversion of waste generated. The Solid Waste Management Coordinator would help to ensure all diversion practices outlined in this Waste Management Plan are upheld and communicate goals to all contractors involved efficiently.

The responsibilities of the Solid Waste Management Coordinator, include, but are not limited to, the following:

- Review the Solid Waste Management Plan including responsibilities of Solid Waste Management Coordinator.
- Work with contractors to estimate quantities of each type of material that would be salvaged, recycled, or disposed of as waste, then assist contractors with documentation.
- Review and update procedures as needed for material separation and verify availability of containers and bins needed to avoid delays.
- Review and update procedures for periodic solid waste collection and transportation to recycling and disposing facilities.

The contractors would perform daily inspections of the construction site to ensure compliance with the requirements of the Waste Management Plan and all other applicable laws and ordinances and report directly to Solid Waste Management Coordinator. Daily inspections would include verifying the availability and number of dumpsters based on amount of debris being generated, correct labeling of dumpsters, proper sorting and segregation materials, and salvaging of excess materials.

Construction debris would be separated onsite into material-specific containers, corresponding to the materials types to facilitate reuse and recycling and to increase the efficiency of waste reclamation. In accordance with City WMP requirements, the City's Construction and Demolition Ordinance, the City's current diversion targets, and AB 341, 89 percent of the construction materials generated by the project are targeted for diversion.

Occupancy

While the construction phase for each future development project in Riverwalk occurs as a one-time waste generation event with each development, tenant/owner occupancy requires an on-going plan to manage waste disposal to meet the waste reduction goals established by the City and State. Future developments within Riverwalk will comply with the City's Recycling Ordinance.

For the project, each dwelling unit would be outfitted with interior refuse and recyclable material storage area pursuant to San Diego Municipal Code §142.0820. All recyclable materials will be delivered to an appropriate recycling facility(s), such as the Miramar Recycling Center, located at 5165 Convoy Street, San Diego, California 92111.

If the project developed at 4,300 multi-family residential units as projected at full build-out, the project would be required to provide a minimum of 8,256 square feet refuse storage area and a minimum of 8,256 square feet recyclable material storage area for a total of approximately 16,512 square feet minimum of exterior refuse and recyclable material storage area for residential developments within Riverwalk. Additionally, the project could develop with as much as 152,000 square feet of commercial (including neighborhood retail uses). At full build-out, this will require a minimum of 2,208 square feet refuse storage area and a minimum of 2,208 square feet recyclable material storage area for a total of approximately 4,416 square feet minimum of exterior refuse and recyclable material storage area. For the Riverwalk development as a whole, the project would be required to provide a minimum of 10,464 square feet refuse storage area and a minimum of 10,464 square feet recyclable material storage area for a total of approximately 20,928 square feet minimum exterior refuse and recyclable material storage area, if it develops with the maximum development intensity identified in the Riverwalk Specific Plan.

On-site recycling services shall be provided to all occupants of non-residential facilities within Riverwalk. Occupants of non-residential facilities within Riverwalk that receive solid waste collection service shall participate in a recycling program by separating recyclable materials from other solid waste and depositing the recyclable materials in the recycling container provided for the occupants. Recycling services are required by Section 66.0707 of the City of San Diego LDC. Based on current requirements, these services shall include the following:

- Continuous assessment of new technologies for recycling, composting, cogeneration, and disposal to maximize efficient use of resources and environmental protection;
- Collection of recyclable materials as frequently as necessary to meet demand;

- Collection of plastic bottles and jars, paper, newspaper, metal containers, cardboard, and glass containers;
- Collection of other recyclable materials for which markets exist, such as scrap metal, wood pallets;
- Collection of food waste for recycling by composting, where available;
- Utilization of recycling receptacles or containers which comply with the standards in the Container and Signage Guidelines established by the City of San Diego Environmental Services Department;
- Designated recycling collection and storage areas; and
- Signage on all recycling receptacles, containers, chutes, and/or enclosures which complies with the standards described in the Container and Signage Guidelines established by the City of San Diego Environmental Services Department.

For non-residential facilities within Riverwalk (as required by Section 66.0707 of the City of San Diego LDC), the building management or other designated personnel shall ensure that occupants are educated about the recycling services as follows:

- Information, including the types of recyclable materials accepted, the location of recycling containers, and the occupants responsibility to recycle shall be distributed to all occupants annually;
- All new occupants shall be given information and instructions upon occupancy; and
- All occupants shall be given information and instructions upon any change in recycling service to the commercial facility.

Additionally, measures for reducing waste of non-residential facilities include contract stipulations and/or tenant programs. The owner, building manager, or other designated personnel shall consider the following:

- Require vendors to use reusable and/or recyclable food containers/flatware;
- Have vendors work with suppliers to reduce packaging materials;
- Choose preferred products with a high level of post-consumer content;
- Set printers to double-sided;
- Reduce electronic waste.

Multi-family residential developments within Riverwalk shall provide on-site recycling services and education to occupants. Recycling services are required by Section 66.0706 of the City of San Diego LDC. Based on current requirements, these services shall include the following:

- Continuous assessment of new technologies for recycling, composting, cogeneration, and disposal to maximize efficient use of resources and environmental protection;
- Collection of recyclable materials at least two times per month;

- Collection of plastic bottles and jars, paper, newspaper, metal containers, cardboard, and glass containers;
- Utilization of recycling receptacles which comply with the standards in the Container and Signage Guidelines established by the City of San Diego Environmental Services Department;
- Designated recycling collection and storage areas; and
- Signage on all recycling receptacles, containers, chutes, and/or enclosures which complies with the standards described in the Container and Signage Guidelines established by the City of San Diego Environmental Services Department.

For multi-family residential developments within Riverwalk (as required by Section 66.0706 of the City of San Diego LDC), the building management or other responsible personnel shall ensure that occupants are educated about the recycling services as follows:

- Information, including the types of recyclable materials accepted, the location of recycling containers, and the occupants' responsibility to recycle shall be distributed to all occupants annually;
- All new occupants shall be given information and instructions upon occupancy; and
- All occupants shall be given information and instructions upon any change in recycling service to the facility.

The project would implement all measures and requirements in the WMP to the fullest degree of accuracy and efficiency. Additionally, the WMP plan for the Riverwalk project is designed to implement and adhere to all city ordinance and regulations with regards to waste management.

Significance of Impacts

Water

The project would connect to existing water lines adjacent to the site and would not require off-site pipeline upsizing of water mains or new water facilities. On-site water infrastructure would be designed and sized to meet the project's water needs in conformance with City standards. The physical construction of these facilities has been analyzed within the various sections of this EIR, as all facilities would be a part of the project's proposed grading and construction plans. Development of the Specific Plan would not significantly increase the demand for water or services, and as such, would not trigger the need for new water facilities or the expansion of those facilities beyond what is proposed for the project. Therefore, project impacts to water infrastructure would be less than significant.

Wastewater

Based on the available capacity of existing sewer facilities, the increase in demand associated with wastewater utilities would not be significant, and new or expanded sewer services would not be needed to serve the project. Impacts related to wastewater infrastructure would be less than

significant. Construction of wastewater facilities to serve the project would be subject to standard industry measures and the SDMC. The physical construction of these facilities has been analyzed within the various sections of this EIR, as all facilities would be a part of the project's proposed grading and construction plans. The City has determined that it has adequate wastewater treatment capacity to serve the project. The existing facilities available to serve the project site were determined to be acceptable; in addition, the treatment facility has remaining capacity. Therefore, no new facilities would be needed to serve the project. Subsequently, the project would not adversely affect existing wastewater treatment services and adequate services are available to serve the project without requiring new or expanded entitlements. The project would result in less than significant impacts.

Solid Waste

The project would generate solid waste during the grading, construction, and operational phases. However, with implementation of the strategies outlined in the project-specific WMP through conditions of approval, as well as compliance with applicable City regulations related to solid waste. The project would not require new or expansion of solid waste facilities, including landfills. Therefore, impacts would be less than significant.

Mitigation Measures

Mitigation would not be required.

5.13.3.2 Issues 2 and 3

Issue 2 Would the project result in the use of excessive amounts of water?

Issue 3 Does the project propose landscaping which is predominantly non-drought resistant vegetation?

Impact Thresholds

Based on the City's CEQA Significance Determination Thresholds, a project could have a significant public utilities impact related to water if it would:

- Water Supply – Result in the need to comply with SB 610 to determine *the availability of water to meet the projected water demands of the project for a 20-year planning horizon, including single and multiple dry years*, or result in the need to comply with SB 221 to determine *whether the decision-maker can make a finding that the project's water demands for the planning horizon will be met before approving a Tentative Map. The types of projects subject to SB 610 and SB 221 include the following:*
 - Residential developments with more than 500 units;
 - Shopping centers or businesses employing more than 1,000 people or having more than 500,000 SF of floor space;

- *Commercial office buildings employing more than 1,000 people or having more than 250,000 SF of floor space;*
 - *Mixed use projects that include one or more of the projects listed above; or*
 - *Projects that would demand an amount of water equivalent to, or greater than, the amount of water required by a 500-dwelling unit project.*
- **Water Conservation**
 - *Use an excessive amount of potable water; or*
 - *Propose predominately non-drought resistant landscaping and excessive water usage for irrigation and other purposes.*

Analysis

Water Supply

The project's SB 610 WSA was based on the City's 2015 UWMP and concluded with a determination of sufficient water supply in normal, single-dry, and multiple dry years to meet the estimated water demand for the project, as shown below in Table 5.13-1, *Water Demand Analysis*. There are no feasible alternative, non-potable water sources in the project vicinity. Collaborative water resource discussions with the City have included preliminary research on the use of two low yield, brackish groundwater wells associated with the abandoned golf course to support the municipal groundwater monitoring program.

As show in Table 5.13-1, the project's estimated demand amounts to 1,159,868 gallons per day (GPD), or 1,299.22 AFY. In the City's 2015 UWMP, the planned water demand for the project site is 369,804 GPD (414.23 AFY) in 2040. The remaining portion of the estimated demand, or 790,064 GPS (884.99 AFY), is accounted for through additional and planned imported water from the San Diego County Water Authority. The project is consistent with water demand assumptions in the regional water source planning documents and there would be adequate water supply to serve all anticipated growth and development resulting from implementation of the project. The project would not result in the use of excessive amounts of water.

Table 5.13-1. Water Demand Analysis

City-Planned Water Demands for Project (2015 UWMP)			
Category	Quantity	Estimated Potable Water Demand	
		Gallons per Day (GPD)	Acre-Foot per Year (AFY)
SANDAG SERIES 13: 2040			
Multi-Family Residential ¹	1,329 DUs	233,904	262.01
Employees ²	2,265 persons	135,900	152.23
TOTAL:		369,804	414.23
Projected Water Demands for Long-Range Development Plan by Year 2040			
Category	Quantity	GPD	AFY
Multi-Family Residential ¹	4,300 DUs	756,800	847.72
Employees ²	1,152,000 SF	138,240	154.85
Landscape Irrigation ³	57.2 Acres	228,800	256.29
Community Dining Amenity ⁴	5,000 SF	6,628	7.42
Pools ⁵	14 Units	29,400	32.93
TOTAL:		1,159,868	1,299.22
Net Water Demands			
Projected Demand		1,159,868	1,299.22
City of San Diego 2015 UWMP – Planned Demand		369,804	414.23
Water Authority AFG – Planned Demand		790,064	884.99
Net Unanticipated Demands		0	0

¹Multi-family water consumption for this project is based on the City's water demand factor of 176 GPD/DU. This demand factor accounts for 80 GPCD (inclusive of minor landscaping demand) and 2.2 persons per household.

²Average commercial employee (administrative, retail, etc.) is based on the City's acceptable standard water demand factor of 60 GPCD/500 square feet.

³Irrigation was estimated as 4,000 GPD/acre (City's Facility Design Guidelines and City's Landscape Watering Calculator).

⁴An estimate of dining/restaurant associated employees is based on the City's acceptable standard water demand factor of 60 GPCD/450 square feet. Customer use is estimated as 31 GPCD per seat and 1 seat per 13 square feet of 50% of the total square footage of facility.

⁵Swimming pool water usage is estimated at 50 GPD/100 square feet (American Society of Plumbing). Additional pool shower use at the facility was estimated at 10 GPD/20 square feet of Pool Area (Title 24, Department of Health Services) assuming two gallons per minute for shower head and an average five-minute shower.

Water Conservation Devices

Relative to water conservation, the project would replace a predominately non-drought resistant landscaping (the golf course), which uses large amounts of water for irrigation, with a low-water consumption project.

Furthermore, the project would not result in the use of excessive amounts of potable water. The project would develop in accordance with Title 24 of the CCR, and incorporate water conservation devices, such as:

- Kitchen faucets that would not exceed a maximum flow rate of 1.5 gallons per minute at 60 psi;
- Standard dishwashers that would not exceed a maximum flow rate of 4.25 gallons per cycle;
- Compact dishwashers that would not exceed 3.5 gallons per cycle; and
- Clothes washers that would not exceed a water factor of six gallons per cubic foot drum capacity.

Drought Tolerant Landscaping

The Specific Plan's proposed landscaping consists of indigenous and drought-tolerant shade trees and shrubs. Raised planters, pots, and rooftop plantings would include drought-tolerant plants. Overall, the project would include native and drought-tolerant species consistent with the Landscape regulations. All irrigation design and maintenance would conform to the City of San Diego's latest water use restrictions, and the project's irrigation system has been designed to meet the City's water efficient landscape ordinance contained within Chapter 14, Article 2, Division 4, *Landscape Regulations*, of the Municipal Code.

Significance of Impacts***Water Supply***

The project would be consistent with regional water resource planning and there would be sufficient water supply to meet the projected demands of the project. Impacts related to potable water supplies and demand from project implementation would be less than significant.

Water Conservation Devices

The project would incorporate water sustainable design features, techniques, and materials that would reduce water consumption. Impacts would be less than significant.

Drought Tolerant Landscaping

The project would include landscaping consisting of native and drought-tolerant species consistent with the Landscape regulations. Impacts related to the use of predominantly non-drought resistant landscaping and excessing water usage for irrigation, therefore, would be less than significant.

Mitigation Measures

Mitigation would not be required.

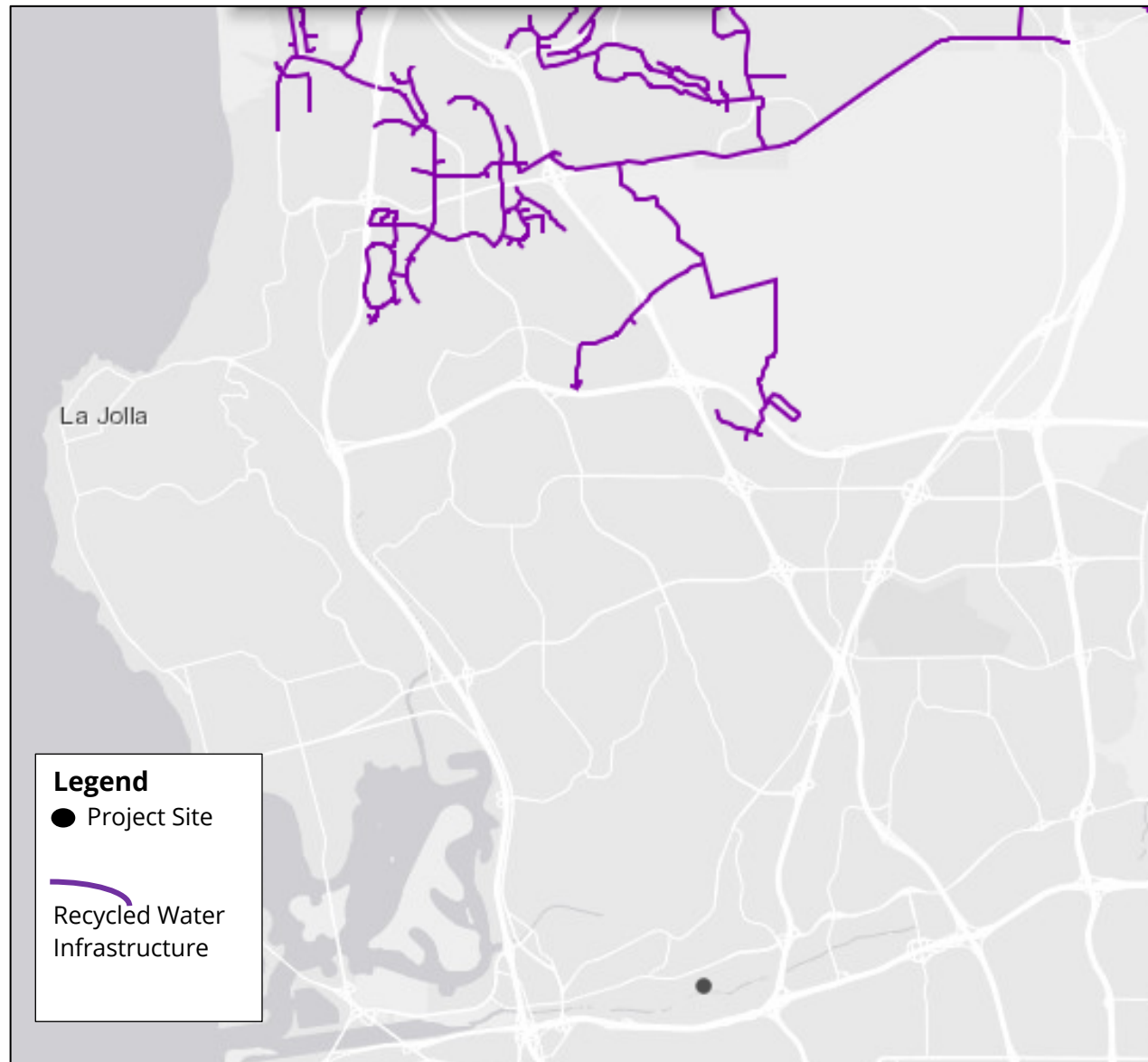


Figure 5.13-1. Recycled Water Availability

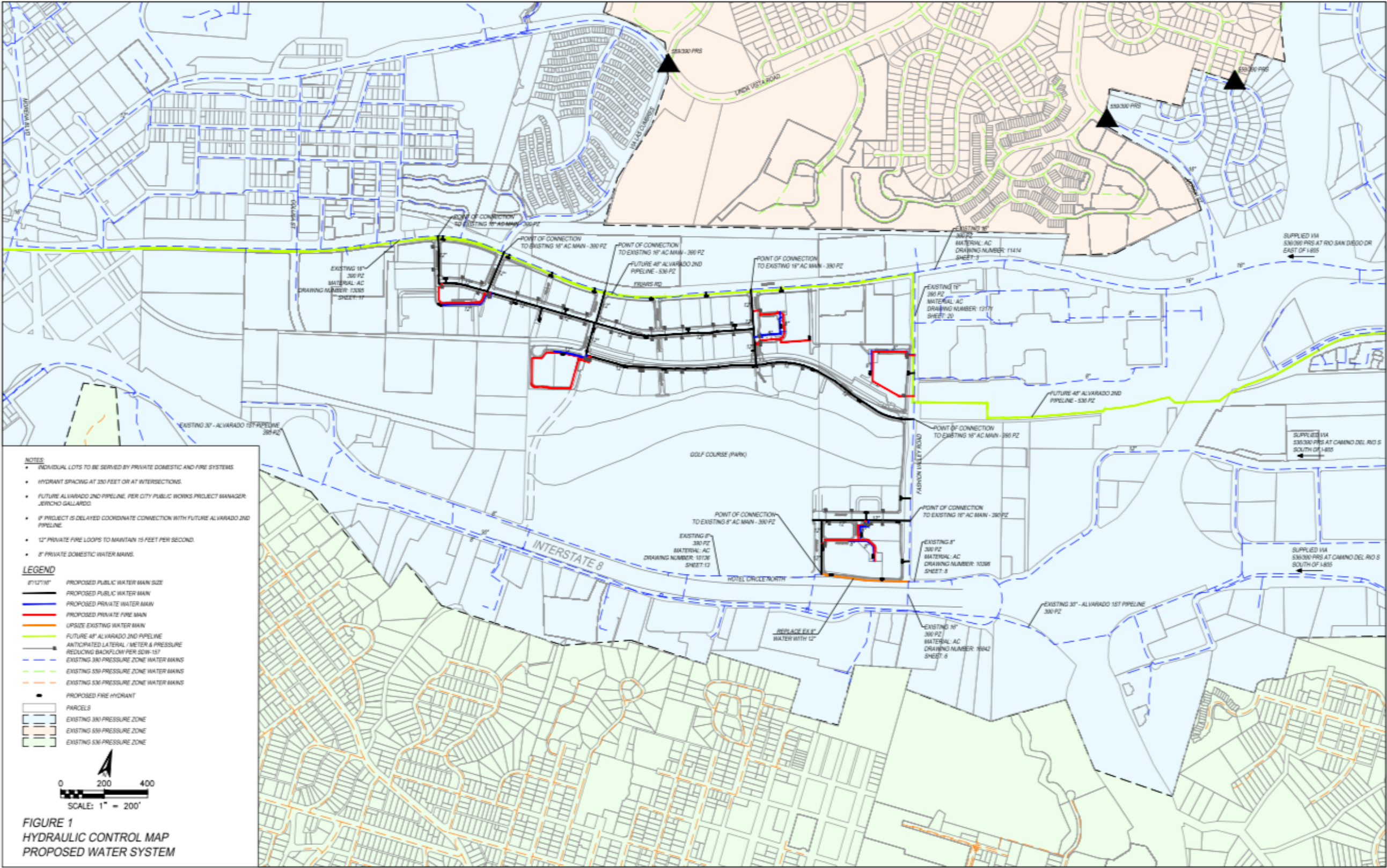


Figure 5.13-2. Proposed Water System Modifications

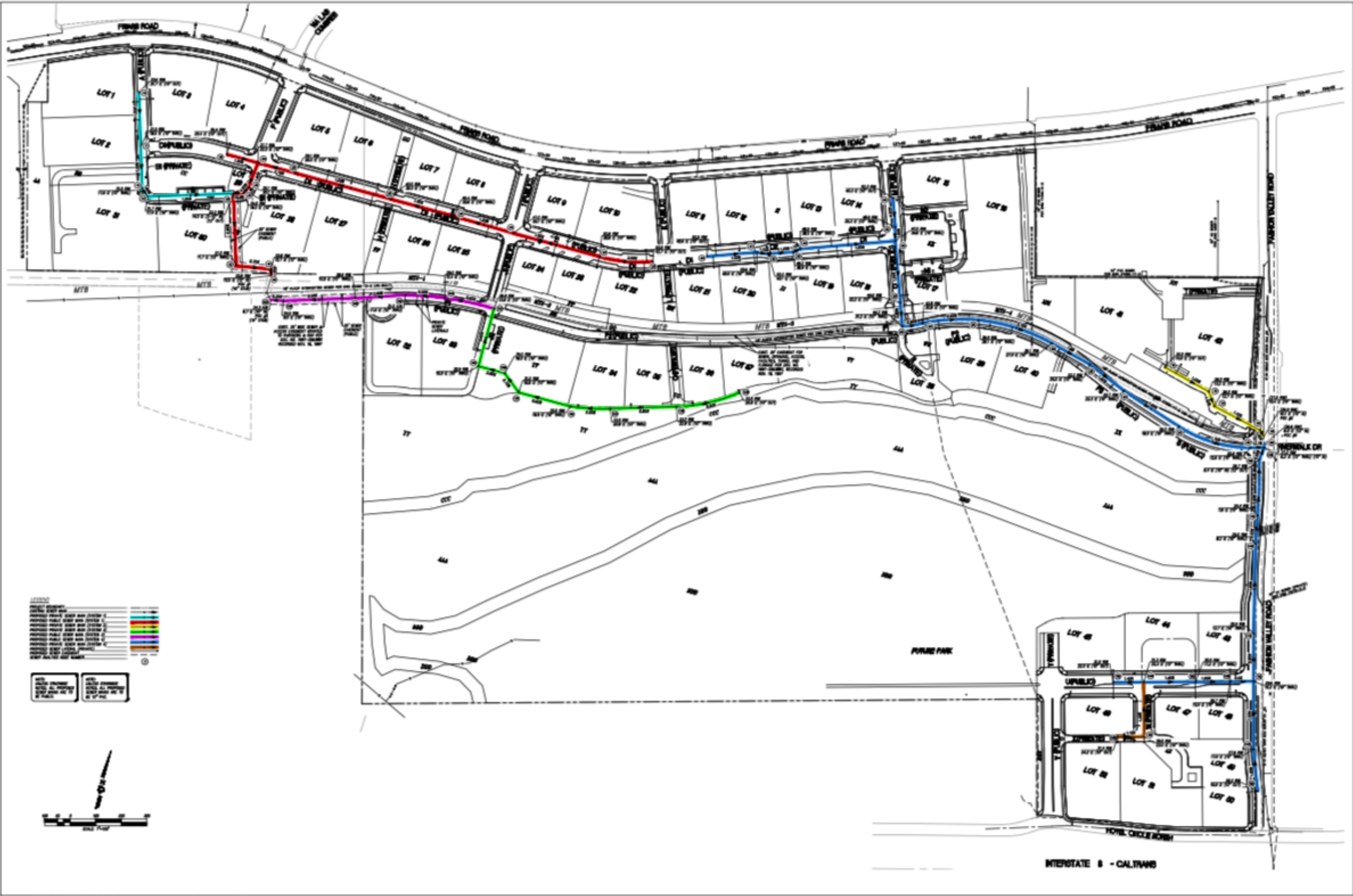


Figure 5.13-3. Proposed Sewer System

5.14 Water Quality

This section evaluates potential water quality impacts associated with the project. The following discussion is based on the *Storm Water Quality Management Plan (SWQMP)* prepared by Chang Consultants (April 7, 2020), included as Appendix O.

5.14.1 Existing Conditions

5.14.1.1 Existing Site Conditions

The project site is situated south of Friars Road, north of Hotel Circle North, and west of Fashion Valley Road in the Mission Valley community of the city of San Diego. It is situated within the San Diego Hydrologic Unit (No. 907.00), Lower San Diego Hydrologic Area (No. 907.10), and Mission San Diego Hydrologic Subarea (HSA) (907.11) per the Water Quality Control Plan for the San Diego Basin (San Diego Regional Water Quality Control Board, September 1994). Storm water generated on-site is discharged to the San Diego River via existing storm drain outfalls. The San Diego River is identified as an impaired water body in the most recent list of Clean Water Act Section 303(d) List of Water Quality Segments. The project site directly discharges to the San Diego River, which is impaired with enterococcus, fecal coliform, low dissolved oxygen, manganese, nitrogen, phosphorous, total dissolved solids, and toxicity.

5.14.1.2 Beneficial Uses

According to the RWQCB, the segment of the San Diego River located in the Mission San Diego HSA 907.11 and adjacent to the project site is classified as having the following beneficial uses:

- **Municipal Domestic Supply (MUN):** Includes uses of water for community, military, or individual water supply systems including but not limited to, drinking water supply.
- **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.
- **Industrial Process Supply (PROC):** Includes uses of water for industrial activities that depend primarily on water quality.
- **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, or 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.

5.14.2 Regulatory Framework

5.14.2.1 Federal

Clean Water Act of 1972

The Federal CWA of 1972 is the principle law governing pollution control and water quality of the Nation's waterways. The objective of this Act is to restore and maintain the chemical, physical and biological integrity of the Nation's waters (33 U.S.C. 1251). Section 402 of the CWA controls water pollution through the NPDES, by regulating point sources that discharge pollutants into waters of the U.S. Implementation of the act is the responsibility of the EPA, which has delegated much of that authority to State and regional agencies.

5.14.2.2 State

National Pollutant Discharge Elimination System

Projects that involve land disturbance of one acre or more (or that are part of a larger plan of development that would disturb one or more acres) are subject to pertinent requirements under the Construction General permit. Specific conformance requirements include implementing a SWPPP, an associated CSMP, employee training, and minimum BMPs, as well as a REAP for applicable projects (e.g., those in Risk Categories 2 or 3, as described below).

Under the Construction General Permit, project sites are designated as Risk Level 1 through 3 based on site-specific criteria (e.g., sediment erosion and receiving water risk), with Risk Level 3 sites requiring the most stringent controls. Based on the site-specific risk level designation, the SWPPP and related plans/efforts identify detailed measures to prevent and control the discharge of pollutants in storm water runoff. Depending on the risk level, these may include efforts such as minimizing/stabilizing disturbed areas, mandatory use of technology-based action levels, effluent and receiving water monitoring/reporting, and advanced treatment systems (ATS). Specific pollution control measures require the use of BAT and/or BCT levels of treatment, with these requirements implemented through applicable BMPs.

While site-specific measures vary with conditions such as risk level, proposed grading, and slope/soil characteristics, detailed guidance for construction-related BMPs is provided in the permit and related City standards (as outlined below), as well as additional sources including the EPA *National Menu of best Management Practices for Storm Water Phase II – Construction* (USEPA 2018), and the *Construction Storm Water Best Management Practices Handbook* (CASQA 2015). Specific requirements for the project under this permit would be determined during SWPPP development, after completion of project plans and applicable submittal to the SWRCB.

National Pollutant Discharge Elimination System Groundwater Permit

Shallow groundwater is expected to occur on site, as previously described. If project-related construction activities entail the discharge of extracted groundwater into receiving waters, the applicable would be required to obtain coverage under the Groundwater Permit. Conformance with this permit is generally applicable to all temporary and certain permanent groundwater discharge activities, with exceptions as noted in the permit fact sheet. Specific requirements for permit conformance include: (1) submittal of appropriate application materials and fees; (2) implementation of pertinent (depending on site-specific conditions) monitoring/testing, disposal alternative, and treatment programs; (3) provision of applicable notification to the associated local agency prior to discharging to a municipal storm drain system; (4) conformance with appropriate effluent standards (as outlined in the permit); and (5) submittal of applicable documentation (e.g., monitoring reports).

National Pollutant Discharge Elimination System Municipal Permit

The Municipal permit implements a regional strategy for water quality and related concerns and mandates a watershed-based approach that often encompasses multiple jurisdictions. The overall permit goals include: (1) providing a consistent set of requirements for all co-permittees; and (2) allowing the co-permittees to focus their efforts and resources on achieving identified goals and improving water quality, rather than just completing individual actions (which may not adequately reflect identified goals). Under this approach, the co-permittees are tasked with prioritizing their individual water quality concerns, as well as providing implementation strategies and schedules to address those priorities.

Municipal Permit conformance entails considerations such as receiving water limitations (e.g., Basin Plan criteria as outlined below), waste load allocations (WLAs), and numeric water quality based effluent limitations (WQBELs). Specific efforts to provide permit conformance and reduce runoff and pollutant discharges to the maximum extent practicable (MEP) involve methods such as: (1) using jurisdictional planning efforts (e.g., discretionary General Plan approvals) to provide water quality protection; (2) requiring coordination between individual jurisdictions to provide watershed-based water quality protection; (3) implementing appropriate BMPs, including LID measures, to avoid, minimize, and/or mitigate effects such as increased erosion and off-site sediment transport (sedimentation), hydromodification and the discharge of pollutants in urban runoff; and (4) using appropriate monitoring/assessment, reporting, and enforcement efforts to ensure proper implementation, documentation, and (as appropriate) modification of permit requirements. The City has implemented a number of regulations to ensure conformance with these requirements, as outlined below under local standards.

Porter-Cologne Water Quality Control Act

The Porter-Cologne Water Quality Control Act established the principal legal and regulatory framework for water quality control in California. This Act is embodied in the California Water Code, which authorizes the SWRCB to implement the provisions of the Federal CWA as previously described. The Porter-Cologne Act also provides for the development and periodic review of water quality control plans that designate beneficial uses for surface waters, groundwater basins, and coastal waters, and establish water quality objectives for applicable waters as outlined below under the *Water Quality Control Plan for the San Diego Basin* heading.

The Porter-Cologne Act establishes the responsibility of the RWQCBs for adopting, implementing, and enforcing water quality control plans, which set forth the state's water quality standards (i.e., beneficial uses of surface waters and groundwater) and the objectives or criteria necessary to protect those beneficial uses. The State of California is divided into nine regions governed by RWQCBs, which implement and enforce provisions of the California Water Code and the CWA under the oversight of the SWRCB. The City is located within the purview of the San Diego RWQCB (Region 9). The Porter-Cologne Act also provides for the development and periodic review of basin plans that designate beneficial uses for surface waters, groundwater basins, and coastal waters, and establish water quality objectives such as those listed for the Miramar Reservoir Hydraulic Area.

5.14.2.3 Local

San Diego Regional Water Quality Control Board

The RWQCB regulates waste discharge and reclaimed water use to minimize and control adverse effects on the quality and beneficial uses of the Region's ground and surface waters. The Regional Board issues permits, called "waste discharge requirements" and "master reclamation permits" which require that waste and reclaimed water not be discharged in a manner that would cause an exceedance of applicable water quality objectives or adversely affect beneficial uses designated in

the Basin Plan. The Regional Boards enforce these permits through a variety of administrative means.

The San Diego Regional Board's Basin Plan is designed to preserve and enhance water quality and protect the beneficial uses of all regional waters. Specifically, the Basin Plan: (1) designates beneficial uses for surface and ground waters; (2) sets narrative and numerical objectives that must be attained or maintained to protect the designated beneficial uses and conform to the state's antidegradation policy; (3) describes implementation programs to protect the beneficial uses of all waters in the Region; and (4) describes surveillance and monitoring activities to evaluate the effectiveness of the Basin Plan [California Water Code sections 13240 thru 13244, and section 13050(j)]. Additionally, the Basin Plan incorporates by reference all applicable State and Regional Board plans and policies. The Basin Plan is the Regional Board's plan for achieving the balance between competing uses of surface and ground waters in the San Diego Region.

Water Board Order No. R9-2007-0001, NPDES Permit No. CAS0108758

The California Regional Water Quality Control Board, San Diego Region (San Diego Water Board) regulates discharges from Phase I municipal separate storm sewer systems (MS4s) in the San Diego Region under the Regional MS4 Permit. The Regional MS4 Permit covers 39 municipal, county government, and special district entities (referred to jointly as Co-permittees) located in San Diego County, southern Orange County, and southwestern Riverside County who own and operate large MS4s which discharge storm water (wet weather) runoff and non-storm water (dry weather) runoff to surface waters throughout the San Diego Region. The Regional MS4 Permit, Order No. R9-2013-0001, was adopted on May 8, 2013 and initially covered the San Diego County Co-permittees. Order No. R9-2015-0001 was adopted on February 11, 2015, amending the Regional MS4 Permit to extend coverage to the Orange County Co-permittees. Finally, Order No. R9-2015-0100 was adopted on November 18, 2015, amending the Regional MS4 Permit to extend coverage to the Riverside County Co-permittees.

City of San Diego Jurisdictional Urban Runoff Management Program

This document is a total account of how the City of San Diego plans to protect and improve the water quality of rivers, bays and the ocean in the region in compliance with the Water Board permit referenced above. The document describes how the City incorporates storm water best management practices into land use planning, development review and permitting, City capital improvement program project planning and design, and the execution of construction contracts.

Construction of any project in the City of San Diego is subject to the requirements of erosion control in the City's Grading Ordinance and is also required to comply with the State Water Resources Control Board (SWRCB) regulations, including the Regional MS4 Permit Order No. R9-2013-0001, and Order No. R9-2015-0100 amending the Regional MS4 Permit. To comply with this permit, the applicant must obtain a construction permit, which requires conformance with applicable BMPs and development of a SWPPP and monitoring program plan.

Drainage Design Manual

Pursuant to SDMC Chapter 14 Article 2 Division 2, Storm Water Runoff and Drainage Regulations, drainage regulations apply to all development in the City, whether or not a permit or other approval is required.

Drainage design policies and procedures for the City are provided in the Drainage Design Manual (City 2017), which is incorporated into the Land Development Manual as Appendix B. The Drainage Design Manual provides design guidelines for drainage and drainage-related facilities associated with development in the City, including criteria for determining watersheds, storm discharge, and applicable storm drain structure types and capacities.

Storm Water Standards Manual

The City has adopted a jurisdiction-specific Storm Water Standards Manual (City 2018d) to reflect related NPDES standards. The Storm Water Manual provides direction for associated regulatory compliance, including identification of construction and post-construction storm water requirements for Standard Projects and Priority Development Projects, pursuant to the Regional MS4 Permit. Specifically, the manual identifies regulatory requirements and provides detailed performance standards and monitoring/maintenance efforts for: (1) construction BMPs; (2) overall storm water management design; (3) site design (LID) and source control BMPs applicable to all projects; (4) pollutant (or treatment) control and hydromodification management BMPs applicable to Priority Development Projects; (5) operation and maintenance requirements for applicable BMPs; and (6) specific direction and guidance to provide conformance with City and related NPDES storm water standards.

Grading Ordinance

The City Grading Ordinance (SDMC Section 142.0101 et seq.) incorporates a number of requirements related to hydrology and water quality, including BMPs necessary to control storm water pollution from sources such as erosion/sedimentation and construction materials during project construction and operation. Specifically, these include elements related to slope design, erosion/sediment control, revegetation requirements, and material handling/control.

San Diego General Plan

The City General Plan provides a number of goals and policies related to water quality concerns in the Conservation Element. The Conservation Element provides a number of goals and policies related to preserving and protecting watersheds and natural drainage features, minimizing runoff and related pollutant generation during and after construction activities, and protecting drinking water resources. Conservation Element goals and policies relevant to water quality include the following:

Climate Change & Sustainable Development

- **CE-A.11.** Implement sustainable landscape design and maintenance.

5.14.3 Impact Analysis

5.14.3.1 Issue 1 and Issue 2

Issue 1 Would the project result in an increase in pollutant discharge to receiving waters during or following construction? Would the proposed project discharge identify pollutants to an already impaired water body?

Issue 2 What short-term and long-term effects would the project have on local and regional water quality? What types of pre- and post-construction Best Management Practices (BMPs) would be incorporated into the project to preclude impacts to local and regional water quality?

Impact Threshold

Based on the City's CEQA Significance Determination Thresholds, *compliance with the Water Quality Standards is assured through permit conditions provided by LDR Engineering*. Adherence to the City storm water standards is thus considered adequate to preclude surface water quality impacts, unless substantial evidence supports a fair argument that a significant impact will occur.

Analysis

As identified previously, implementation of the plan would be in proximity to a 303(d) listed water body (San Diego River). Development near this impaired water body could potentially generate pollutants that would exacerbate existing impairments, cause additional pollution, and impact water quality if not properly controlled. The following categories of anticipated or potential pollutants have been identified as "pollutants of concern" based on a "mixed-use residential" and "community development" proposed site use:

- Sediments
- Nutrients
- Heavy metals
- Organic Compounds
- Trash and debris
- Oxygen demanding substances
- Oil and grease
- Bacteria and viruses (potential)
- Pesticides

Water quality is affected by sedimentation caused by erosion, by runoff-carrying contaminants, and by direct discharge of pollutants. Potential project-related pollutant discharge and water quality impacts are associated with both short-term construction activities and long-term operation and maintenance of buildout of the Specific Plan, as described below.

Short-term (Construction)

Project-related excavation, grading, and construction activities could potentially result in generation of pollutants that could affect receiving waters, including impaired water bodies like the San Diego River. Project activities would involve the removal of surface stabilizing features such as structures

and vegetation and site grading, which can result in increased erosion and sediment transport. Implementation of the project would also involve the demolition of existing on-site facilities, including structures and pavement. The introduction of demolition-related debris into local drainages or storm drain systems could result in downstream water quality impacts, potentially including pollutants contributing to identified downstream water quality impairments. Additionally, project construction would involve the on-site use and/or storage of hazardous materials such as fuels, lubricants, solvents, concrete, paint, and portable septic system wastes. The accidental discharge of such materials during construction could potentially result in significant impacts if these pollutants reach downstream receiving waters, particularly materials such as petroleum compounds that are potentially toxic to aquatic species in low concentrations.

Short-term water quality effects from construction would be addressed through adherence to the City's Grading Ordinance and conformance with City storm water standards and the related NPDES Construction General Permit. This would include implementing an authorized SWPPP for proposed construction/demolition including (but not limited to) erosion and sedimentation BMPs and BMPs associated with use and storage of construction-related hazardous materials.

Long-term (Operational)

The increase in impervious surfaces generally associated with the development of land leads to increased opportunity for contaminated runoff that carries oils, heavy metals, pesticides, fertilizers, and other contaminants to enter a watershed. On-site runoff would be treated and conveyed to storm drain systems within the project site. On-site runoff would be directed to on-site pollutant control BMPs including biofiltration basins and Bio Clean Environmental Services Modular Wetland System (MWS) Linear Units prior to comingling with off-site flow. With the implementation of these BMPs, the project is not expected to affect the quality of storm water runoff leaving the site in the near- or long-term. The project would also implement BMPs directed at precluding impacts to local and regional water quality. This would include efforts such as the use of flow regulation/water quality (detention and biofiltration) facilities and drainage facility maintenance (e.g., to remove accumulated sediment). LIDs and BMPs that apply to the project are summarized below.

LID Site Design BMPs

LID site design BMPs are intended to avoid, minimize, and/or control post-development runoff, erosion potential, and pollutant generation. The LID process employs design practices and techniques to effectively capture, filter, store, evaporate, detain, and infiltrate runoff close to its source. Specific LID site design BMPs are identified in the project SWQMP, based on requirements in the City Storm Water Standards Manual. These strategies/measures include efforts to maintain natural drainage/hydrologic features, minimize and disperse impervious areas throughout the site, minimize soil compaction, collect and convey runoff to detention/water quality basins, and use native and/or drought-tolerant landscaping. All of the proposed LID site design BMPs would help reduce long-term urban pollutant generation by minimizing runoff rates and amounts, retaining permeable areas, increasing on-site filtering, and reducing erosion/sedimentation potential.

Source Control BMPs

Source control BMPs are intended to avoid or minimize the introduction of pollutants into storm drains and natural by reducing on-site pollutant generation and off-site pollutant transport. Specific source control BMPs are identified in the project SWQMP, based on requirements in the City Storm Water Standards Manual. These include efforts to prevent illicit discharges (e.g., through use of educational materials); provide appropriate “no dumping” signs/ stencils at storm drain system inlets/catch basins (and other applicable locations); properly design/ contain trash storage (e.g., by precluding rainfall/run-on contact), protect storm drain inlets; provide interior parking structures; provide interior floor drains and elevator shaft pumps; and implement non-chemical pest control measures (and restrict chemical use appropriately when necessary). All of the proposed source control BMPs would help to improve long-term water quality within and downstream from the project site by avoiding or minimizing pollutant generation and exposure to storm flows at the source.

Structural/Pollutant Control BMPs

Pollutant control (or structural) BMPs are designed to remove pollutants from urban runoff for a design storm event through means such as filtering or treatment. Pollutant control BMPs are required to address applicable pollutants of concern for Priority Development Projects, and must be designed in conformance with applicable requirements in the City Storm Water Standards Manual to provide long term pollutant removal that is “reasonably equivalent” to retention of the design capture volume (DCV, with retention facilities typically providing the highest level of treatment). Because the existing on-site soils exhibit low infiltration rates (between 0.01 and 0.50 inches per hour), full infiltration is not feasible. Partial infiltration is also infeasible due to the fill thickness and BMP groundwater separation would not meet City requirements. Pursuant to Chapter 5 of the City Storm Water Standards Manual (Part 1), preliminary pollutant control BMPs identified in the project SWQMP includes a series of biofiltration basins that would serve as pollutant control BMPs for the mixed-use development lots and street. The required basin area for each lot has been determined based on conceptual impervious and pervious footprints. This was done to verify feasibility of setting aside the required BMP area. As the design progresses to the final engineering stages, additional basins can be incorporated into each lot. The BMPs will be established based on the building (roof), grading, and landscaping design. MWS Linear BMPs are proposed for street areas where biofiltration basins are not feasible.

Hydromodification Management Facilities

Discussion/justification of hydromodification control requirements do not apply. The project site is located within and immediately adjacent to the San Diego River. This segment of the San Diego River is hydromodification exempt per the October 1, 2015, "San Diego County Regional Watershed Management Area Analysis." The flowline at the storm drain discharge points serving the site would outlet into the main San Diego River channel, which is below FEMA's 10-year floodplain elevations. Therefore, the project would meet the hydromodification exemption criteria.

Post-construction BMP Monitoring/Maintenance Schedules and Responsibilities

Identified BMPs include physical structures such as detention/biofiltration basins and signs/stencils that require ongoing monitoring and maintenance. Pursuant to requirements in the City Storm Water Standards Manual and the related NPDES Municipal Permit, the applicant would be required to enter into a written Maintenance Agreement with the City for applicable facilities and implement an associated Operation and Maintenance Plan. Specifically, this process would entail identifying and documenting maintenance responsibilities, funding sources, activities, and schedules to ensure proper BMP function in perpetuity. A summary of typical maintenance procedures for applicable proposed BMPs is provided below, pursuant to direction in the City Storm Water Standards Manual.

Detention/Biofiltration Basins

Inspections are typically conducted every 6 or 12 months and after major storm events to assess/identify: (1) vegetation conditions; (2) accumulation of sediment, litter, and/or debris; (3) standing water; (4) inlet/outlet obstructions; and (5) damaged structural components. Ongoing maintenance generally includes vegetation trimming/removal, removal (and proper disposal) of accumulated materials (e.g., sediment and debris), elimination of standing water (and causes), clearing of inlet/outlet structures, as-needed structural repairs, and identification of additional maintenance/cleaning services if applicable.

Signs/Stencils

Inspections are generally conducted annually to ensure legibility, with associated maintenance including as-needed repairs or replacement of faded, vandalized or otherwise illegible signs, stencils, or other labeling facilities.

Significance of Impacts

The project would implement appropriate source control, site design, and treatment-control BMPs during construction and post-construction, as well maintenance efforts in conformance with the City's storm water standards. The project would not have any short-term and long-term effects on local and regional water quality. Implementation of the proposed BMPs would preclude significant potential impacts to water quality. Additionally, the project would comply with associated requirements including the NPDES Construction General, Municipal and Groundwater permits. These requirements have been reviewed by qualified City staff and would be reverified during the ministerial process. Adherence with the standards would preclude considerable contribution to water quality. Therefore, potential pollutant discharge and water quality impacts associated with construction and operation of the Specific Plan would be less than significant.

Mitigation Measures

Mitigation would not be required.

5.15 Public Services and Facilities

This section evaluates potential public services and facilities impacts associated with the project. The following discussion includes police protection, fire-rescue, libraries, parks and recreation, and schools as they relate to the project and is based on correspondence with individual service providers, included as Appendix J.

5.15.1 Existing Conditions

Public services are functions and facilities that serve residents on a community-wide basis. Public services are generally provided to an area based on population, although each public service provider has their own set of service standards. Based on SANDAG's population forecast, the estimated population of Mission Valley is roughly 28,588 as of 2018. The following section contains a description of the existing public services and facilities that would serve the Specific Plan area.

5.15.1.2 Police Protection

Police protection for the Specific Plan area is provided by the San Diego Police Department (SDPD). The SDPD is divided into nine divisions. The Specific Plan area is currently served by Beat 623 of the SDPD Western Division Substation, located at 5215 Gaines Street. This station serves the Mission Valley community west of SR 163, along with other nearby neighborhoods, including Linda Vista, Morena, University Heights, North Park, Burlingame, Hillcrest, Midtown, Mission Hills, Midway District, Loma Portal, Point Loma Heights, Ocean Beach, Sunset Cliffs, Roseville-Fletridge, La Playa, and Wooded Area. The Western Division serves a population of 129,709 people and encompasses 22.7 square miles.

This police station is located approximately one-half mile west of the project site. The Western Division is currently staffed with 110 sworn patrol personnel and one civilian employee. Officers work ten-hour shifts. Staffing is comprised of three shifts, which operate from 6:00 AM to 4:00 PM (First Watch), 2:00 PM to Midnight (Second Watch), and from 9:00 PM to 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 SDPD does not staff individual stations based on ratios of sworn officers per 1,000 population. The goal Citywide is to maintain 1.48 officers per 1,000 population. The Department is currently staffing 1.34 sworn officers per 1,000 residents based on 2014 estimated Citywide resident population of 1,311,882. There are no current plans for additional police sub-stations in the project area. Correspondence with SDPD notes that police response times in the Mission Valley community

will continue to increase with build-out community plans and the increase of traffic generated by new growth.

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 5.15-1, *Western Division Call Priority Response Times*, lists the Department's response-time guidelines, the 2016 Citywide average response times for each priority call level, and the 2016 average response times for each priority level call within Beat 623. As indicated in Table 5.15-1, average response times for Beat 623 exceed the Department goals for all call priorities. The Department strives to maintain the response time goals identified in Table 5.15-1 as one of various other measures used to assess the level of service to the community.

Table 5.15-1. Western Division Call Priority Response Times

Call Priority	Department Goal Response Times	2016 Citywide Average Response Times	2016 Beat 623 Average Response Times
Priority E- Imminent threat to life	Within 7 minutes	7 minutes	6.6 minutes
Priority 1- Serious crimes in progress	Within 14 minutes	16 minutes	13.4 minutes
Priority 2- Less serious crimes with no threat to life	Within 27 minutes	42.5 minutes	37.3 minutes
Priority 3 -Reported after a crime has been committed	Within 80 minutes	100.9 minutes	108.8 minutes
Priority 4- Parking complaints and lost and found report	Within 90 minutes	150.6 minutes	169.5 minutes

Source: SDPD, March 10, 2020.

5.15.1.3 Fire/Life Safety Protection

Fire protection and emergency services are provided by the San Diego Fire-Rescue Department (SDFD), which serves a total area of approximately 343 square miles, a population of over 1.4 million, and 17 miles of coastline extending three miles offshore. SDFD is a multi-faceted organization that

provides the City with fire and life-saving services including fire protection, emergency medical services, and lifeguard protection at San Diego beaches.

Two fire stations serve the project site. Station Number 45, located at 9366 Friars Road, approximately 3.3 miles east of the project site, and Station Number 5, located at 3902 Ninth Avenue, approximately 1.63 miles southeast of the project site. Station 45 is equipped with a Battalion Chief's vehicle, fire engine, aerial truck, and HAZMAT unit. Fire Station 45 serves the existing project site and would continue to be the primary station servicing the project site. Station 5 serves Hillcrest and its surrounding areas. This station includes a fire engine and a battalion chief's vehicle and has no paramedic unit. *Fire Stations 5, 17, 18, 20, 23, 25, and 28 are located outside the Community Plan area but provide service within portions of the CPU area. As of 2017, the City is not planning to construct new stations in Mission Valley (Citygate Associates, 2017).*

The City of San Diego has established a first-due unit response time of 7.5 minutes for medical emergencies and small fires, 90 percent of the time from the receipt of the 911 call in fire dispatch (Citygate Associates, 2017). This equates to a one-minute dispatch time, 1.5-minute company turnout time, and five-minute travel time in the most populated areas of the city (Citygate Associates, 2017). As of 2016, Fire Station 45 had an average travel time of about seven minutes, above the five-minute goal (Citygate Associates, 2017). As of 2016, Fire Station 45 had an average dispatch and crew turnout time of about nine minutes from the time of the 911 call to the time of arrival – above the City's established goal of 7.5 minutes (Citygate Associates, 2017).

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

5.15.1.4 Schools

Public school service would be provided by San Diego Unified School District (SDUSD). There are no public schools located within Mission Valley. Correspondence with the SDUSD identifies that the schools that would serve the project area are located in the adjacent communities of Linda Vista and Kearny Mesa. Specifically, public schools serving the project area are Carson Elementary School, located in the Linda Vista community at 6905 Kramer Street, approximately 0.8-mile northeast of the project site; Montgomery Middle School, also located in the Linda Vista community at 2470 Ulric Street, approximately 1.6 miles northeast of the project site; and Kearny High Complex, located in the Kearny Mesa community at 7651 Wellington Street, approximately 2.7 miles northeast of the project site. According to the SDUSD, these three schools have an estimated capacity of 3,329 students with a collective enrollment of 2,275 students for the 2019-2020 school year.

There are three charter schools located in the project area: Audeo Charter School, located at 7510-7610 Hazard Center Drive in the Mission Valley community, approximately one mile east of the project site; Empower Charter School, located at 2230 E Jewett Street in the Linda Vista community, approximately two miles north of the project site; and San Diego Cooperative Charter School, located at 7260 Linda Vista Road in the Linda Vista community, approximately 1.9 miles north of the project site.

5.15.1.5 Libraries

Library services are provided by the San Diego Public Library (SDPL). Mission Valley is served by the Mission Valley Branch of the SDPL, located at 2123 Fenton Parkway, approximately four miles east of the project site. The Mission Valley Branch library is a 19,760-square-foot facility that opened in 2002 and is open seven days a week. Hours of operation for the Mission Valley Branch library are typically 9:30 a.m. to 6:00 p.m., with the exception of 11:30 a.m. to 8:00 p.m. on Tuesdays and Wednesdays and 12:30 p.m. to 5:00 p.m. on Sundays. The library includes a large community meeting room, seminar rooms, a children's library, an outdoor patio with a children's garden that has a flowing river sculpture, a computer lab, and a mezzanine and terrace. Additionally, three other SDPL branches are located close to the project site: the Linda Vista Library, located at 2160 Ulric Street, approximately 1.4 miles from the project, the Mission Hills – Hillcrest/Knox Library, located at 215 W. Washington Street, approximately two miles from the project, and the University Heights Library, located at 4193 Park Boulevard, approximately 3.5 miles from the project.

The General Plan establishes a minimum size of 15,000 square feet of dedicated library space for branch libraries and a target resident population of 30,000 people per library. Based on this requirement, the 19,760-square-foot Mission Valley Branch library exceeds the minimum library size. The current household population in the Mission Valley Community Plan area is approximately 28,588. This excludes people residing in group quarters, such as those in hospitals, nursing facilities, and certain kinds of student housing.

5.15.1.6 Parks or Other Recreational Facilities

Mission Valley contains two public recreational amenities, Sefton Field, which houses four little league fields and is located approximately three miles west of the project site, south of Friars Road and a public park located within the Civita development, approximately three miles northeast of the project site. In addition, the San Diego River Park Master Plan area is located through the middle of the project site along the San Diego River. Included as part of the San Diego River Park Master Plan is an integrated and connected trail system, which provides additional opportunities for access to and recreation along the San Diego River.

Several regional recreational amenities are located near the Mission Valley community. These include Balboa Park, Presidio Park, and Mission Bay Park. Balboa Park, located just north of downtown San Diego, approximately three miles south of the project site, encompasses more than 1,000 acres and includes open space areas, natural vegetation zones, green belts, gardens, walking paths, three off-leash dog parks, restrooms, and recreational facilities, such as tennis courts, swimming pool, lawn bowling, a golf course, and disc golf. In addition, Balboa Park contains 15 museums, several theaters, gift shops, restaurants, and the San Diego Zoo. Presidio Park is located approximately three miles west of the project site, in the Old Town San Diego community, and contains open lawn for picnicking and play, as well as restrooms and Junípero Serra Museum. Mission Bay Park, located approximately five miles northwest of the project site, is the largest aquatic park of its kind in the country, consisting of over 4,600 acres in roughly equal parts land and water. Mission Bay has 27 miles of shoreline, 19 of which are sandy beaches with eight locations designated as official swimming areas. Mission Bay Park offers boat docks and launching facilities, sailboat and motor boat rentals, bicycle and walking paths, basketball courts, and playgrounds, as well as open lawn areas for picnicking and recreation. Public restrooms and showers are available and lifeguard stations are located in designated areas.

5.15.2 Regulatory Framework

5.15.2.1 State

California Mutual Aid Plan

The California Mutual Aid Plan establishes policies, procedures, and responsibilities for requesting and providing inter- and intra-agency assistance in emergencies. The plan directs local agencies to develop automatic or mutual aid agreements, or to enter into agreements for assistance by hire where local needs are not met by the framework established by the Mutual Aid Plan.

Assembly Bill 16

AB 16 was passed in 2002 and created the Critically Overcrowded School Facilities program to supplement the construction provisions within the School Facilities Program (SFP). The SFP provides state funding assistance for new construction and modernization of facilities. The Critically Overcrowded School Facilities program allows school districts that have been determined by the California Department of Education (CDE) to have critically overcrowded facilities to apply for new construction projects without meeting all SFP program requirements (CDE 2015). Districts with SFP new construction eligibility and school sites included on a CDE list of source schools may apply (Chapter 33, Statutes of 2002).

Senate Bill 50

SB 50, or the Leroy F. Greene School Facilities Act of 1998, restricts the ability of local agencies to deny project approvals on the basis that public school facilities (classrooms, auditoriums, etc.) are inadequate. School impact fees are payments to offset capital cost impacts associated with new developments, which result primarily from costs of additional facilities, related furnishings and equipment, and projected capital maintenance requirements. As such, agencies cannot require additional mitigation for any school impacts (Chapter 407, Statutes of 1998).

Quimby Act and Assembly Bill 1359

Cities and counties have been authorized since the passage of the 1975 Quimby Act (Government Code Section 66477) to pass ordinances requiring that developers set aside land, donate conservation easements, or pay fees for park improvements. Revenues generated through the Quimby Act cannot be used for the operation and maintenance of park facilities. The dedicated land or fees may only be used for the development or rehabilitation of neighborhood or community parks or recreational facilities in the subdivision they were provided for, according to AB 1359 (Chapter 413, Statutes of 2013), unless certain requirements are met and an exception is made. The goal of the Quimby Act is to require developers to help mitigate the impacts of property improvements. The act gives authority for passage of land dedication ordinances only to cities and counties. Special districts must work with cities and/or counties to receive parkland dedication and/or in-lieu fees. The fees must be paid, and land conveyed directly to the local public agencies that provide park and recreation services communitywide.

Fire Hazard Severity Zones

Responsibility for wildland fire protection in California is divided between the State, local government, or the Federal government. The California Department of Forestry and Fire Protection (CAL FIRE) adopted Fire Hazard Severity Zone maps for State Responsibility Areas in 2007, as well as recommended maps for Very High Fire Hazard Severity Zones in Local Responsibility Areas. Local Responsibility Areas include incorporated cities, cultivated agriculture lands, and portions of the desert. The CAL FIRE recommendations are not the same as actual zones, which do not go into effect unless adopted by local agencies (CAL FIRE 2012). In San Diego County, CAL FIRE has made recommendations on 13 cities, including the City of San Diego. The County of San Diego Wildland Hazard Map tool provides local designations based on CAL FIRE's recommendations (SDFD 2009). Fire Hazard Severity Zones are based on increasing fire hazard and are designated as "No Designation," "Moderate," "High," or "Very High."

The *Very High Fire Hazard Severity Zone (VHFHSZ) Map*, as shown on Figure 5.16-8, was established on February 24, 2009 in coordination between the San Diego Fire Department and Cal-Fire. The VHFHSZ map identifies areas within and adjacent to the project site that would fall into a risk zone. However, areas north of Friars Road have been developed since publication of the VHFHSZ map, and the project site is now mostly surrounded by urban development. The remaining area of vegetated fuel

load is located along the San Diego River, which traverses the project site. Safety issues relative risk of wildfire are addressed in Section 5.16, *Health and Safety*, of the EIR.

5.15.2.2 Local

City of San Diego General Plan

The City's General Plan contains a Public Facilities, Services, and Safety Element to address publicly managed and provided facilities and services. This element provides policies for financing, prioritization, developer, and City funding responsibilities for public facilities in the City.

Fire Services Deployment

Fire response deployment simply stated is about the speed and weight of attack. Speed calls for first-due, all-risk intervention units (engines, trucks, and/or rescue ambulances) strategically located across a community responding in an effective travel time. These units are tasked with controlling moderate emergencies without the incident escalating to second alarm or greater size, which unnecessarily depletes departmental resources as multiple requests for service occur. Weight is about multiple-unit response for serious emergencies such as a room and contents structure fire, a multiple-patient incident, a vehicle accident with extrication required, or a heavy rescued incident. In these situations, enough firefighters must be assembled within a reasonable timeframe to safely control the emergency, thereby keeping it from escalating to greater alarms. The science of fire crew deployment is to spread crews out across a community for quick response to keep emergencies small with positive outcomes, without spreading the crews so far apart that they cannot amass together quickly enough to be effective in major emergencies (Citygate 2017).

In 2011, the City retained Citygate Associates, LLC to conduct a Fire Services deployment planning study to:

1. Further refine the findings of the Regional Fire Service Deployment Study that Citygate conducted for the County of San Diego that pertained to Fire-Rescue deployment within the City;
2. Analyze whether the SDFD's performance measures are appropriate and achievable given the risks, topography, and special hazards to be protected in the City; and
3. Review existing SDFD deployment and staffing models for efficiency and effectiveness and determine how and where alternative deployment and staffing models could be beneficial to address current and projected needs (Citygate 2011).

Prior to this study, the SDFD used the National Fire Protection Association (NFPA) Standard 1710 for the Organization and Deployment of Fire Suppression Operations to determine adequate response times. According to the standards, initial fire suppression resources shall be deployed to provide for the arrival of an engine company within a four-minute travel time to 90 percent of incidents. The

study concluded that additional fire-rescue resources were needed to meet these service delivery goals. In response, the SDFD adopted the recommendations of the study and set new deployment standards. The updated deployment standards and fire station planning measures are described below.

Distribution of Fire Stations

To treat medical patients and control small fires, the first responding unit should arrive within seven minutes and 30 seconds from the time of the 9-1-1 call receipt in fire dispatch. This equates to a one-minute dispatch time, one minute and 30 seconds for company turnout time, and a five-minute drive time in the most populated areas (Citygate 2017).

Multiple-Unit Effective Response Force for Serious Emergencies

To confine fires near the room of origin, to confine wildland fires to fewer than three acres when noticed promptly, or to treat up to five medical patients at once, the goal is for a multiple-unit response of at least 17 personnel to arrive within 10 minutes and 30 seconds from the time of the 9-1-1 call receipt in fire dispatch, 90 percent of the time. This equates to a one-minute dispatch time, a one minute and 30 seconds company turnout time, and an eight-minute drive time spacing for multiple units in the most populated areas (Citygate 2017).

Adopted Fire Station Location Measures

To direct fire station location timing and crew size planning as the community grows, the adopted fire unit deployment performance measures based on population density zones listed in the General Plan. Structure fires in urban areas over 1,000 people per square mile would require a response standard of five minutes for first due travel time, 7.5 minutes for total reflex time, eight minutes for first alarm travel time, and 10.5 minutes for first alarm total reflex. Reflex time is the total time from receipt of a 9-1-1 call to arrival of the required number of emergency units (Citygate 2017).

Aggregate Population Definitions

Standards listed in the General Plan guide the determination of response time measures and the need for fire stations. The first-due unit travel time goal for metropolitan areas of over 200,000 people is four minutes. Urban-suburban areas of less than 200,000 people would require a goal of five minutes (Citygate 2017).

5.15.3 Impact Analysis

5.15.3.1 Issue 1

Issue 1: Would the 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 Safety protection; Libraries; Parks or other recreational facilities; maintenance of public facilities, including roads; and Schools?

Impact Threshold

Per the City's Significance Determination Thresholds, impacts to public services and facilities would be significant if a project would conflict with the community plan in terms of the number, size, and location of public service facilities and if so, would it result in the need for new or expanded public service facilities, the construction of which would cause direct, adverse physical environmental impacts in order to maintain acceptable service ratios, response times, or other performance objectives.

Analysis

The project would build-out consistent with the Mission Valley Community Plan. The provision of public services and facilities was evaluated in the Mission Valley Community Plan Update Program EIR. The analysis presented in this section is intended to evaluate those public services and facilities needed to specifically serve the Riverwalk project.

Police

The project site is served by the Western Division of the SDPD. The project would introduce 7,998 residents at the site, based on the proposed 4,300 units and a density factor of 1.86 persons per household. The project is consistent with the Mission Valley Community Plan, which assumes development of the project as proposed by the Riverwalk Specific Plan. Although the project could result in an increase in service calls, the SDPD has facilities and staffing in the project area to adequately serve the project, ongoing funding for police services is provided by the City General Fund; and no new facilities or improvements to existing facilities would be required.

In 2017, Citygate Associates, LLC published the Standards of Response Coverage Review for the City of San Diego Fire-Rescue Department (Citygate 2017). The City adopted the performance measure recommended by Citygate in that report that first-due units should arrive to the site of the emergency within 7.5 minutes 90 percent of the time from the receipt of the 911 call in fire dispatch. This includes the one-minute dispatch time, 1.5-minute company turnout time, and five-minute drive time in the most populated areas. Additionally, the Citygate standards state that for multiple-unit calls 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 10:30 minutes/seconds 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 (Citygate 2017).

The project would result in approximately 7,998 residents at the site (based on the proposed 4,300 units and a density factor of 1.86 persons per household), which would increase the demand for fire protection within the service area. The project would be constructed in accordance with applicable fire codes and would comply with applicable City regulations. The project would provide fire safety features, such as installation of fire sprinklers. The project would not conflict with the Mission Valley Community Plan in terms of number, size, and location of existing or planned Fire-Rescue facilities. The Fire-Rescue Department has facilities and staffing in the project area to adequately serve the project. Although the project could result in an increase in service calls, no new or expanded facilities or improvements to existing facilities would be required as a result of the project. Therefore, no new or expanded facilities would be required as a result of the project and impacts to Fire Protection would not be significant.

Schools

SDUSD offers a host of magnet, alternative, charter, and special education programs that would be available to serve residents of the project. There are no identified deficiencies at these schools and SDUSD currently does not have plans for new or expanded school facilities that would serve the project site. Based on correspondence with SDUSD (see Appendix J), the following schools currently serve the project site:

School	Address	Estimated Program Capacity ¹	2018-19 Enrollment	2019-20 Enrollment
Carson Elementary	6905 Kramer Street San Diego, CA 92111	525	380	367
Montgomery Middle	2470 Ulric Street San Diego, CA 92111	1,064	465	487
Kearny High Complex	7651 Wellington Street San Diego, Ca 92111	1,737	1,456	1,421

Footnote: ¹ Capacities are approximate and are calculated using current class size ratios; if class size ratios change, additional or less capacity may be available. Attendance boundaries are reviewed annually and are subject to change.

A new elementary school with an approximate capacity for 500 transitional Kindergarten (TK) through 5th grade students is planned within the Civita development at the intersection of Via Alta and Civita Boulevard, located approximately 2.5 miles east of Riverwalk. The preliminary opening date of the school is Fall 2022. Attendance boundaries for the new school are not yet finalized, but

scenarios under review may assign future housing in Riverwalk to this new elementary school. Middle school boundaries are also under review and may change from the above table. High school assignment is not expected to change.

Carson Elementary has no portable and 32 permanent classrooms. Montgomery Middle has no portable and 43 permanent classrooms. Kearny High Complex has eight portable and 64 permanent classrooms.

Student generation rates vary based on the type of project, number of units, bedroom mix, neighborhood, and other factors. There are no district standard rates. In order to estimate the number of students generated by this project, SDUSD referenced existing similar developments in the project vicinity, as well as additional projects that have been proposed in the area. Based on planned and proposed projects, SDUSD was able to estimate student generation rates for the project. The student generation rates are the average from the existing developments and proposed developments, with a low and high range.

Student generation rates based on the average from existing and planned developments, with a low and high range, and are shown in Table 5.15-2, *Estimated Generation Rates for the Riverwalk Project*.

Table 5.15-2. Estimated Generation Rates for the Riverwalk Project

Proposed Development	Address	Number of Units	Student Generation Rate	Estimated Number of Students
Riverwalk Project	1150 Fashion Valley Road San Diego, CA 92108	4,300	K-5: 0.041-0.082 6-8: 0.014-0.028 9-12: 0.070-0.140	K-5: 176-353 6-8: 60-120 9-12: 65-602
TOTAL			K-12: 0.055-0.110	K-12: 301-602

Source: SDUSD, November 13, 2019.

Based on the estimated student generation, the project would generate approximately 301-602 students. SDUSD concluded that the project can be accommodated by existing district schools at the middle and high school levels. However, the elementary level would be a concern as the estimated number of students, particularly at the high range, could exceed the capacity of Carson Elementary. However, a new elementary school is planned within the Civita development in Mission Valley which would add additional capacity.

The existing schools have sufficient capacity in the near-term to serve these students, and the project would not result in the need for new or expanded school facilities. Furthermore, the project would be required to pay school fees in compliance with CGC Section 65995 et seq.

Libraries

Library services are provided by the SDPL. The City's General Plan establishes goals and policies for the library system facilities. Per the General Plan, a library system should contribute to the quality of life through technologically improved services and welcoming environments. Branch libraries should be 15,000 square feet or larger and include features and services that address community-specific needs.

The project would result in approximately 7,998 residents, based on 1.86 persons per household. Even with the population increase projected to be generated by the project, existing library systems would not be impaired, nor would additional or expanded library facilities be required. Because residents may use the Mission Valley Library or any branch library that is part of the San Diego Public Library system, the existing branches could adequately serve the increase in residents from the project, and no new or altered facilities would be required. Impacts to library service would be less than significant.

Parks or Other Recreational Facilities

The Recreation Element of the General Plan provides "Park Guidelines" to address Open Space, Resource-Based Parks, and Population-Based Parks. Open Space and Resource-Based Parks serve the larger regional and/or visitor population. Population-Based Parks (commonly known as Neighborhood and Community Parks) are facilities and services that are located in close proximity to residential development and are intended to serve the daily needs of the neighborhood and community. When possible, these parks adjoin schools in order to share facilities and are ideally within walking distance of the residences within their service area. Community Parks are intended to meet a minimum standard of providing 2.8 acres per 1,000 population. The General Plan's Recreation Element minimum standard of 2.8 acres per 1,000 people for population-based parks can be achieved through a combination of neighborhood and community park acreages and park equivalencies.

Based on the projected build-out population for the community, General Plan standards for population-based parks and recreation facilities in the Mission Valley Community Plan area would require a minimum of 203 usable acres of public parkland. As of 2018, there are approximately 19 acres of population-based parks in the Mission Valley Community Plan area. The Mission Valley Community Plan includes approximately 75 additional acres of population-based parkland, bringing the grand total of population-based parks at buildout to approximately 94.15 acres, about 108.85 acres short of the 203-acre General Plan standard. Including park equivalencies, the park total at buildout would be 152.79 acres.

Mission Valley contains two public recreational amenities: Sefton Field, which houses four little league fields approximately three miles west of the project site and a public park located within the Civita development, located approximately three miles northeast of the project site. In 2013, the City

approved the San Diego River Park Master Plan. A major portion of the San Diego River Park Master Plan is within the Mission Valley community. When fully implemented, the San Diego River Park will provide a natural park for the City. The San Diego River Park Master Plan envisions a waterway that is healthy, accessible to the public, and inhabited with wildlife. The plan provides guidance on how the San Diego River can be reasserted as the focus of the River valley and become an asset to the community. Included as part of the San Diego River Park Master Plan is an integrated and connected trail system, which will provide additional opportunities for recreation along the San Diego River.

There are limited semiprivate recreational facilities at the western end of Mission Valley. The Mission Valley YMCA is a semiprivate facility located at 5505 Friars Road. The YMCA provides both indoor and outdoor recreational opportunities in a park-like setting along the River. The Mission Valley Community Plan includes two additional park-like recreation areas are planned for future development by the City on City-owned land in Mission Valley. One location is identified in the vicinity of SDCCU Stadium, and the second location is near the existing YMCA.

Several regional recreational amenities are located near to the Mission Valley community, including Balboa Park, Presidio Park, and Mission Bay Park. Balboa Park encompasses more than 1,000 acres and is located just north of downtown San Diego, approximately three miles south of the project site. Mission Bay Park encompasses more than 4,200 acres and is located roughly 1.5 miles west of the project site. Future residents of the project could easily access these regional recreation amenities.

The Mission Valley Community Plan *provides for the development of a number of new population-based parks, including two major parks (Stadium Park and Riverwalk River Park), two Neighborhood Parks (Civita Central Neighborhood Park and a park on the Post Office site¹), a mini park in the Civita development, two pocket parks (Franklin Ridge and Hazard Center), and a special activity park (Public Utilities site), as well as several park equivalencies as opportunities arise. The Community Plan also provides for the construction of two recreation centers—one at the Stadium site and one near the Riverwalk site—and one aquatic complex (location to be determined) within the community. Associated with development of recreation facilities for the Mission Valley community are park equivalencies² that include the Mission Valley Preserve Canyon Open Space Trail; portions of resource-based parks, including trail amenities to support the San Diego River Pathway and redevelopment of the southeast area of Mission Bay Park; privately-owned park sites, including a proposed pocket park at the Union Tribune site, a three-acre Neighborhood Park as part of the Town and Country Hotel revitalization project, a proposed mini park in the Civita development, and a proposed approximately two-acre Neighborhood Park in the Civita development; and non- traditional parks, including parks to be developed in conjunction*

¹ Located at 2600 Camino Del Rio North.

² *Park equivalencies* are alternative methods of providing recreation facilities to achieve citywide equity or to satisfy community specific needs and demands.

with redevelopment projects, including the Mission Valley Heights project, the Mission Valley Mall, and Fenton Marketplace.

The project would generate approximately 7,998 residents at the site, which would require 22.4 acres of population-based parkland. In accordance with provision of required population-based park space, Riverwalk would provide approximately 51 acres of publicly-owned park land eligible for population-based park credit, resulting in an excess of approximately 29 acres of park space provided beyond what is required by City standards. The project would also receive equivalency park credit for two pedestrian bridges within the Riverwalk River Park. Therefore, the project would more than satisfy its 22.4-acre population-based park requirement through the provision of parks on-site.

Urban parks would be phased with development in the North District. These parks would be privately-owned publicly-accessible parks. These areas would have a recreation easement recorded, allowing for unrestricted public access. The Riverwalk River Park, which would be delivered with project development, may serve as a potential location for a Recreation Center. The Riverwalk River Park would be delivered in phases. The first phase (Phase 1), would include opening up the existing golf course as a passive park in a form substantially similar to current conditions. When development of the Central District or South District occurs, the site would be graded and active amenities would be constructed in the Central District park areas, with passive park space remaining south of the San Diego River (Phase 2). The final phase of the Riverwalk River Park would include full build-out of amenities and active recreation areas in the River Park District (Phase 3). The designs of each phase will be decided through a GDP process consistent with Council Policy 600-33.

As noted above, Mission Valley contains two public recreational amenities a little league baseball facility and a public park located within the Civita development. These parks would serve community residents, as well as visitors to Mission Valley. Additionally, it is anticipated that the residents of Riverwalk would likely utilize the various regional parks located within close proximity to the project site for recreational needs. These parks have been developed as regional amenities with the purpose of providing active and passive recreation to residents of the region. Additionally, the project would provide active recreational amenities on-site in the form of the Riverwalk River Park traversing the center of the project site; various mini, linear, and pocket parks; plazas; and trail connections to Riverwalk's internal pedestrian and bicycle trail network.

Because the two regional parks are all located less than three miles from the project site, it is likely that users from the project would partake in these parks more or less equally, diffusing potential use of project residents to all three parks. Due to the regional nature of these parks and the likely diffusion of use, adverse impacts to the regional park amenities would not occur. The project would not result in impacts to recreational facilities.

While the community of Mission Valley has a deficit of existing required park space, the project would not impair existing facilities. The project would exceed the General Plan's requirement relative to population-based parks. The physical impacts related with future construction of the Riverwalk River Park and its associated park amenities (e.g. pedestrian bridges, walkways, etc.) have been conducted as part of the project's analysis; and no additional impacts beyond those already addressed would occur for noise, biological resources, historical resources, tribal cultural resources, water quality, or hydrology.

Significance of Impacts

The project would not result in significant impacts to police protection, fire/life safety protection, libraries, parks, or other recreation facilities, and schools.

Mitigation Measures

Mitigation would not be required.



Figure 5.15-1. Location of Public Services

5.16 Health and Safety

This section evaluates the potential for health and safety impacts associated with the project. (Note: For a discussion of the potential for flooding and associated risk, see Section 5.12, *Hydrology*.)

The discussion of hazardous materials in this section is based on those technical reports prepared by SCS Engineers and an Envirofacts search (January 2019) conducted for the project site (Appendix V). In order to conduct a Phase I environmental site assessment for the project, the Specific Plan area was divided into three areas (see Figure 5.16-1, *Project Site Subareas for Purposes of the Hazardous Materials Evaluations*). Area 1 encompasses the areas of the Riverwalk Golf Course located north of the MTS trolley right-of-way and south of Friars Road. Area 2 includes the areas of the golf course located south of the MTS trolley right-of-way and is transected by the San Diego River. Area 3 is developed with the southeastern-most portion of the golf course, immediately north of Hotel Circle North, the Presidio View Apartments, and Handlery Hotel. SCS Engineers prepared a *Phase I Environmental Site Assessment* (January 20, 2017) for each of three project site areas (Appendix T). Additionally, SCS Engineers prepared a *Subsurface Assessment* (October 20, 2014) for each of three areas (Appendix U).

5.16.1 Existing Conditions

5.16.1.1 Current and Historical Land Use

Currently, the project site is developed primarily as a golf course, identified as Riverwalk Golf Club, and encompasses the areas of the golf course located north and south of the MTS/trolley right-of-way. Based on review of information sources used to conduct the Phase I ESAs, agricultural uses occurred on the project site from approximately 1915 to 1945. In 1948, urban development begins to extend on the project site. These activities possibly took place at the time when organochlorine pesticides such as dichlorodiphenyltrichloroethane (DDT), chlordane, and metals-based pesticides, such as arsenic, were in wide general use for pest or weed control. These classes of pesticides are known to have the potential to remain in detectable concentrations in the subsurface for extended periods of time. It is possible that organochlorine and metals-based pesticides may have been used, stored, and/or mixed at the project site. With the exceptions of use of pesticides and herbicides at the project site, and the possible use of other hazardous materials associated with farming activities, no obvious historical facilities, features of concern, or land uses indicative of the use, storage, or generation of hazardous materials/wastes or petroleum products were found in the historical resources reviewed.

5.16.1.2 Sensitive Receptors

Sensitive receptors are determined based upon special factors which may include the age of the users or occupants, the frequency and duration of the use or occupancy, continued exposure to

hazardous substances as defined by Federal and State regulations, and the user's ability to evacuate a specific site in the event of a hazardous incident. Land uses considered to be sensitive receptors include residential, school, childcare centers, acute care hospitals, and long-term health care facilities.

Residential land uses, in the form of apartments and condominiums, are located immediately adjacent to the project site on the west, east, and south; and north of the project site across Friars Road. Additional residential development, including single family homes and multi-family units occur farther to north of the project site.

No schools, childcare centers, or hospitals and long-term health care facilities are located within 0.25 mile of the project site. The closest schools to the project site include the University of San Diego (USD), located just over a mile north of the project site, and two private schools: Francis Parker Lower School, located approximately 2.4 miles from the project site; and Francis Parker Middle and Upper School, located approximately 0.7 mile from the project site. A new public school is planned at the Civita development, which would be located approximately two miles from the project site. Other public schools located proximate to the project site are Carson Elementary School (approximately two miles north of the project site), Alice Birney Elementary School (approximately three miles southeast of the project site), and Longfellow Elementary School (approximately five miles north of the project site). A childcare center is provided at the YMCA, located approximately four miles east of the project site. The closest hospitals are Scripps Mercy and UCSD Medical Center, located approximately 1.5 miles south of the project site. Sharp Hospital is located approximately 3.5 miles north of the project site. (See Figure 5.16-2, *Location of Sensitive Receptors*.)

5.16.1.3 Hazardous Materials

On-site hazardous material conditions associated with the existing uses were assessed through a review of historical documents, an interview with property owner representatives, site reconnaissance, and a review of Federal, State, and local regulatory agency databases. Significant sites/facilities within the project site and vicinity that were identified in the database search are presented in Table 5.16-1, *Environmental Regulatory Database Report Findings*. As shown in Table 5.16-1, there are no Federal or State identified hazardous materials on the project site. Underground/above ground storage tanks, other hazards, and historical auto stations have been identified within a 0.5-mile radius of the project site.

Additional records research included reviewing databases of the SDFD, San Diego Building Department (SDBD), SDAPCD, San Diego Industrial Wastewater Program (IWP), RWQCB, and the San Diego County Department of Agriculture, Weights, and Measures. SDFD records yielded inspection reports showing the need for additional occupancy and hazard identification signage across all three areas. SDBD records showed installations and building permit applications for all three areas and a UST in Area 1. The SDAPCD, IWP, RWQCB, and San Diego County Department of Agriculture,

Weights, and Measures all responded that there were no records available for any of the three areas of the project site.

The California Division of Oil and Gas Map was reviewed regarding oil and gas well locations within one mile of the site. There was one well interpreted to be within this vicinity, located approximately one-half mile to the southeast of the site. Based on the distance from the site, this well is not considered to represent a recognized environmental condition to the project site, and is not addressed further in the Phase I reports and this PEIR.

An environmental regulatory database report ("Radius Map Report") was prepared by Environmental Data Resources, Inc. (EDR) for the project site and is included in the appendices to each of the Phase I ESAs prepared for the project. Local, State, and Federal regulatory databases were reviewed for the project site and for those facilities within up to one mile of the site. This report was prepared in general accordance with the ASTM standard for the regulatory database review for Phase I ESAs. Current addresses of the project site were not listed on any of the regulatory databases reviewed by the report, with the exception of former address of 5900 Friars Road within Area 1. This address was listed on the Leaking Underground Storage Tank (LUST) and San Diego Site Assessment and Mitigation (SAM) databases.

On-Site Conditions

Based on the analysis conducted by SCS, the following recognized environmental conditions/concerns (RECs) were determined to be within the Specific Plan area.

Area 1

Site reconnaissance for Area 1 included the observation of site grounds, the site perimeter, and two buildings located in the western portion of the Riverwalk Golf Course, just south of Friars Road generally south of the Via Las Cumbres terminus at Friars Road. Existing buildings consist of offices, storage areas, a dining area, restrooms and lockers, carts and a mower wash area, and a service bay with one aboveground lift. The eastern-most building was identified as "Building 1," and the western-most building as "Building 2."

An inground wastewater clarifier, which has the potential to release wastewater containing petroleum products, solvents, and hazardous wastes into the subsurface, was observed proximate to Building 1. One metal container, reported to formerly store hazardous materials, was observed north of Building 2. An aboveground storage tank (AST) was observed west of Building 2. An open area used to store fertilizers was observed southeast of Building 1.

Table 5.16-1. Environmental Regulatory Database Report Findings

Federal or State Government Database	Search Radius	Number of Reported Facilities	On Site	Adjacent to the Site
National Priorities List (NPL)	1.00 mile	0	No	No
NPL Delisted	1.00 mile	0	No	No
Comprehensive Environmental Response Compensation and Liability System (CERCLIS)	0.50 mile	0	No	No
No Further Remedial Action Planned (NFRAP)	0.50 mile	0	No	No
Resource Conservation and Recovery Act- Corrective Action (RCRA COR ACT)	1.00 mile	0	No	No
RCRA Treatment and Disposal Facilities (RCRA TSD)	0.50 mile	0	No	No
RCRA Generators (RCRA GEN)	0.25 mile	1	No	No
Federal Engineering and Institutional Controls (IC/EC)	0.50 mile	0	No	No
Emergency Response Notification System (ERNS)	0.12 mile	0	No	No
State/Tribal- Equivalent NPL	1.00 mile	0	No	No
State/Tribal-Equivalent CERCLIS (Envirostor)	1.00 mile	6	No	No
State/Tribal Solid Waste List (SWL)	0.50 mile	1	No	No
State/Tribal Leaking Underground Storage Tanks (LUST) (San Diego Site Assessment and Mitigation [SAM]) (State Leaks, Investigation, and Cleanup [SLIC])	0.50 mile	32	No	Yes
State/Tribal Underground/Aboveground Storage Tanks (USTs/ASTs)	0.25 mile	3	No	Yes
State/Tribal Voluntary Cleanup Program (VCP)	0.50 mile	0	No	No
Federal Brownfields	0.50 mile	0	No	No
Local Lists of Hazardous Waste/Contaminated Sites (San Diego HMMD)	Site only	0	No	N/A
Local Lists of Registered Storage Tanks	0.25 mile	14	No	Yes
Local Land Records (DEED)	0.50 mile	0	No	No
Other (Haznet, Cortese)	0.12 mile	1	No	Yes
EDR Proprietary Records (Historical Auto Stations and Cleaners)	0.25 mile	6	No	Yes

N/A = Not applicable

One 2,000-gallon gasoline underground storage tank (UST) and one 550-gallon waste oil UST, located 60 feet southeast of Building 1, were removed from Area 1 on February 1, 1988. The soil within the vicinity of the removed USTs was impacted with gasoline. A sample of groundwater collected from the area reportedly contained high levels of hydrocarbon components. The County of San Diego Department of Health Services (DHS) opened an unauthorized release case in May 1988. In March 1989, DHS issued a letter indicating that remedial action took place, which consisted of contaminated soil removal and groundwater monitoring for one year. A new 2,000-gallon gasoline UST was installed 45 feet south of Building 1 in May 1988 and removed in 1997.

An inspection report prepared by the Fire Department 2016 for the of Riverwalk Golf Course maintenance yard in Area 1 noted the need to obtain permits for the allowance of compressed

gases and storage of hazardous materials, a hazardous materials business plan, and proper labeling and secondary containment in the fertilizer storage area.

Hazardous Materials, Petroleum Products, and Hazardous Wastes. Small retail quantities (SRQs) (quantities of hazardous materials in containers of five gallons or less, and less than 50 gallons total) of automotive maintenance supplies were observed at various locations throughout Area 1. Hazardous materials and petroleum products observed to be used or stored in Area 1 include diesel, gasoline, motor oil, antifreeze, fertilizers, fungicides, maintenance/janitorial supplies, growth regulator, and herbicides. Hazardous wastes included waste oil and waste antifreeze. Hazardous materials, petroleum products, and hazardous wastes found within Area 1 were observed to be properly stored with no obvious evidence of spills or releases. With the exception of minor surficial staining observed at various locations on asphalt-paved parking areas and concrete surfaces, no obvious indications were observed that a release of hazardous materials/wastes or petroleum products had occurred within Area 1.

Area 2

Site reconnaissance for Area 2 included the observation of site grounds, the site perimeter, the Riverwalk Golf Club clubhouse building located generally in the east-central portion of the project site north of the San Diego River, and the interiors of all structures. The clubhouse building is located at the northern portion of Area 2 and consists of offices, storage areas, a dining area, kitchen, restrooms, a concession area, and a pro shop. Hazardous materials/wastes were not observed to be stored or generated at the clubhouse. A portable manufactured building, used as an instructional area, was observed at the eastern edge of Area 2. Various bathroom buildings are located throughout Area 2. In addition, the San Diego River, which generally trends from northeast to southwest and flows down to the southwest, transects the central portion of Area 2. A 55-gallon drum containing cooking grease and grease interceptor were observed east of the clubhouse. It was reported that the contents of the grease drum were transported off-site on a regular basis.

Hazardous Materials, Petroleum Products, and Hazardous Wastes. No obvious indications of the storage or use of hazardous materials, petroleum products, and/or hazardous wastes were observed in Area 2.

Area 3

Site reconnaissance for Area 3 included the observation of site grounds and the site perimeter. Two restroom facilities are located in Area 3 and were observed to have concrete masonry unit walls constructed over concrete foundations. Two water wells were observed at the southeast portion of Area 3.

Hazardous Materials, Petroleum Products, and Hazardous Wastes. No obvious indications of the storage or use of hazardous materials, petroleum products, and/or hazardous wastes were observed in Area 3.

In addition to the area-specific evaluations described above, all areas were also evaluated for on-site utility facilities, such as SDG&E transformers, high-power transmission lines, storm drains, heating/cooling sources, potable water sources, and wastewater conveyances. In areas where SDG&E transformers were observed, SDG&E was contacted regarding the possibility of polychlorinated biphenyls (PCBs) being present. SDG&E reported that they have never specified PCBs in their transformers. No obvious indications of leaks were noted near the transformers.

A review of the September 2010 County Department of Environmental Health (DEH) database of facilities storing hazardous materials, generating hazardous wastes, and discharging unauthorized releases was conducted for all three areas on the project site. While records exist for Area 1 in regard to the previously removed UST, DEH confirmed that there are no files associated with Areas 2 and 3.

Off-Site Sources/Facilities Proximate to Project Site

Conditions of the various land uses within the vicinity of the project site—including commercial, residential, and open space—were observed for off-site sources of hazardous materials. No obvious indications of the use, storage, or generation of hazardous materials/wastes or petroleum products were observed.

5.16.1.4 Emergency Response/Evacuation

Emergency Response Plans

The City is a participating jurisdiction in the San Diego County Multi-Jurisdictional Hazard Mitigation Plan (MHMP), a countywide plan to identify risks and minimize damage from natural and man-made disasters (County 2018). The primary goals of the Plan include efforts to promote and provide compliance with applicable regulatory requirements (including through the promulgation/enhancement of local requirements), increase public awareness and understanding of hazard-related issues, and foster inter-jurisdictional coordination.

The San Diego Office of Homeland Security (SD-OHS) oversees the City's Homeland Security, Disaster Preparedness, Emergency Management, and Recovery/Mitigation Programs. The primary focus of this effort is to ensure comprehensive emergency preparedness, training, response, recovery, and mitigation services for disaster-related effects. The SD-OHS also maintains the City Emergency Operations Center (EOC) and an alternate EOC in a ready-to-activate status, ensures that assigned staff are fully trained and capable of carrying out their responsibilities during activations, and manages the EOC during responses to multi-department and citywide emergencies to support incident response activities and maintain citywide response capabilities (County 2010).

Emergency Evacuation Plans

The City is also a participating agency in the County's Unified San Diego County Emergency Services Organization and County of San Diego Operational Area Emergency Operations Plan (EOP; County

2014), which addresses emergency issues including evacuation. Specifically, Annex Q (Evacuation) of the Plan notes that: *Primary evacuation routes consist of major interstates, highways and prime arterials within San Diego County...*, with I-5, I-8, and SR 163 identified as the primary evacuation routes in the project vicinity.

5.16.1.5 Airport Influence Areas and Helipads/Heliports

Airport Influence Areas

As presented in Section 2.0, *Environmental Setting*, the project site is located within the Montgomery Field and San Diego International Airport Influence Areas (AIAs), as presented in the ALUCPs for those airports (see Figure 2-10, *Montgomery Field ALUCP Airport Influence Area*, and Figure 2-11, *San Diego International Airport ALUCP Airport Influence Area*). The ALUCP provides policies and criteria for the City of San Diego to implement and for the Airport Land Use Commission (ALUC) to use when reviewing development proposals. The AIA is *the area in which current or future airport related noise, overflight, safety, or airspace protection factors may significantly affect land uses or necessitate restrictions on those uses*. To facilitate implementation and reduce unnecessary referrals of projects to the ALUC, the AIA is divided into Review Area 1 and Review Area 2. The composition of each area is determined as follows:

Review Area 1

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 60 dB CNEL or greater together with all of the safety zones depicted on the associated maps in this chapter. Within Review Area 1, certain types of land use actions, including rezones and plan amendments, are to be submitted to the ALUC for review and consistency determination with the ALUCP.

Review Area 2

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 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 northeast corner of the Riverwalk site is located within AIA Review Area 2 of the Montgomery-Gibbs Executive Airport and within AIA Review Area 2 of the SDIA ALUCP. Additionally, the site is located within the Airspace Protection Boundary and the Overflight Notification Boundary of the SDIA ALUCP. See Section 5.1, *Land Use*, for a discussion of the project's relationship with the Montgomery Field and San Diego International Airport ALUCPs.

Helipads/Heliports

In addition to the helipads located at the Montgomery-Gibbs Executive Airport and the SDIA, there are private heliports within a two-mile radius of the project site. These include: a heliport at the Hazard Center Office Tower, located approximately 1.3 mile east of the project site; at UCSD Medical Center and at Scripps-Mercy Hospital, located approximately 1.5 miles south of the project site; and at the Sharp Hospital, located approximately 3.5 miles northeast of the project site. (See Figure 5.16-4, *Helipad/Heliport Locations*.)

5.16.1.6 Wildfire Hazards

Potential wildfire risk zones include areas that have steep slopes, limited precipitation, and plenty of available vegetation fuel. The project site is developed as a golf course, with three nine-hole golf courses, driving range, clubhouse building, maintenance facilities, surface parking, access roadways, and golf cart paths/bridges. The San Diego River flows through the central portion of the project site. The San Diego MTS Green Line Trolley crosses the site parallel to the river, approximately 300 to 800 feet north of the river.

The *Very High Fire Hazard Severity Zone (VHFHSZ) Map*, as shown on Figure 5.16-8, was established on February 24, 2009 in coordination between the San Diego Fire Department and Cal-Fire. The VHFHSZ map identifies areas within and adjacent to the project site that would fall into a risk zone. However, the project site is mostly surrounded by urban development. The remaining area of vegetated fuel load is located along the San Diego River, which traverses the project site.

5.16.2 Regulatory Framework

Numerous Federal, State, and local laws and regulations regarding hazardous materials have been developed with the intent of protecting public health, the environment, surface water, and groundwater resources. Over the years, the laws and regulation have evolved to deal with different aspects of the handling, treatment, storage, and disposal of hazardous substances. Relevant laws and regulations are discussed below.

5.16.2.1 Federal

Resource Conservation and Recovery Act of 1976

Federal hazardous waste laws are largely promulgated under the Resource Conservation and Recovery Act (RCRA) (Code of Federal Regulations [CFR] Title 40, Part 260), as amended by the Hazardous and Solid Waste Amendments of 1984 (which are primarily intended to prevent releases from LUSTs). These laws provide for the “cradle to grave” regulation of hazardous wastes. Specifically, under RCRA, any business, institution, or other entity that generates hazardous waste is required to identify and track its hazardous waste from the point of generation until it is recycled, reused, or disposed of. The USEPA has the primary responsibility for implementing RCRA, although

individual states can obtain authorization to implement some or all RCRA provisions.

Occupational Safety and Health

In regard to worker safety, Federal Occupational Safety and Health Administration (OSHA) along with the California OSHA define and enforce worker safety standards and require proper handling and disposal of hazardous materials according to OSHA and EPA regulations. These regulations ensure that safety standards and potential risks, for example to asbestos or lead exposure, are considered and remediated in accordance with the National Emissions Standards for Hazardous Air Pollutants, OSHA, and other applicable State and Local regulations.

Federal Aviation Administration Noticing Requirements

The FAA, under CFR Title 14, Part 77, Safe, Efficient Use and Preservation of the Navigable Airspace, requires submittal of a Notice of Construction or Alteration for applicable projects within identified airport Noticing Surface Areas. Specific requirements for such notices include structures more than 200 feet above the ground surface, construction or alteration that extends within identified (theoretical) slopes projecting from airport runways (or other applicable locations), all airport projects, and certain other transportation projects. After submittal of the required notice, the FAA conducts an aeronautical review prepared under the provisions of 49 US Code Section 44718 and, if applicable, CFR Title 14, Part 77. Objects determined to be an obstruction or hazard by Part 77 or Terminal Instruction Procedures, or create change to flight operations, approach minimums, or departure routes would be considered incompatible.

Proposed developments may be incompatible and would require evaluation if they would generate other obstructions, such as release of any substance that would impair visibility (e.g., dust, smoke, or steam); emit or reflect light that could interfere with air crew vision; produce emissions that would interfere with aircraft communication systems, navigation systems or other electrical systems; or attract birds or waterfowl. Upon completion of the aeronautical review, the FAA issues either a Determination of Hazard to Navigation (i.e., if a project would exceed an obstruction standard and result in a “substantial aeronautical impact”) or a Determination of No Hazard to Navigation. In the latter case, the FAA may include site-specific conditions or limitations to ensure that potential hazards are avoided (e.g., noticing requirements or lighting restrictions).

5.16.2.2 State

Porter-Cologne Water Quality Control Act

The Porter-Cologne Water Quality Control Act restricts the disposal of wastes and requires cleanup of wastes that are below hazardous waste concentrations but could impact ground and surface water quality. California regulations that address waste management and prevention and cleanup of contamination include CCR Title 22 Division 4.5 Environmental Health Standards for the Management of Hazardous Waste, CCR Title 23 Waters, and CCR Title 27 Environmental Protection.

California Code of Regulations

Most State and Federal regulations and requirements that apply to generators of hazardous waste are codified in CCR Title 22, Division 4.5. Title 22 contains detailed compliance requirements for hazardous waste generation, transportation, treatment, storage, and disposal facilities. Because California is a fully authorized state under RCRA, most RCRA regulations are integrated into Title 22. CalEPA/Department of Toxic Substances Control (DTSC) regulates hazardous waste more stringently than the USEPA through Title 22, which does not include as many exemptions or exclusions as the equivalent Federal regulations. Similar to the CHSC (as outlined below), Title 22 also regulates a wider range of waste types and waste management activities than RCRA. The State has compiled a number of additional regulations from various CCR titles related to hazardous materials, wastes, and toxics into CCR Title 26 (Toxics), and provides additional related guidance in Titles 23 (Waters) and 27 (Environmental Protection), although California hazardous waste regulations are still commonly referred to as Title 22.

Title 24 of the CCR provides a number of requirements related to fire safety, including applicable elements of Part 2, the CBC; Part 2.5, the California Residential Code (CRC); and Part 9, the California Fire Code (CFC). Specifically, CBC Chapter 7 (Fire and Smoke Protection Features) includes standards related to building materials, systems, and assembly methods to provide fire resistance and prevent the internal and external spreading of fire and smoke (such as the use of non-combustible materials and fire/ember/smoke barriers). CBC Chapter 9 (Fire Protection Systems) provides standards regarding when fire protection systems (such as alarms and automatic sprinklers) are required, as well as criteria for their design, installation, and operation. Section R327 of the CRC includes measures to identify Fire Hazard Severity Zones and assign agency responsibility (i.e., Federal, State, and Local Responsibility Areas, refer to the discussion below under California Department of Forestry and Fire Protection), and provides fire-related standards for building design, materials, and treatments. The CFC establishes minimum standards to safeguard public health and safety from hazards including fire in new and existing structures. Specifically, this includes requirements related to fire hazards from building use/occupancy (e.g., access for fire-fighting equipment/personnel and the provision of water supplies), the installation or alteration/ removal of fire suppression or alarm systems, and the management of vegetative fuels and the provision of defensible space.

California Health and Safety Code

The CalEPA/DTSC established rules governing the use of hazardous materials and the management of hazardous wastes. CHSC Section 25531, et seq., incorporates the requirements of SARA and the CAA as they pertain to hazardous materials. Under the California Accidental Release Prevention Program (CalARP, CHSC Section 25531 to 25545.3), certain businesses that store or handle more than 500 pounds, 55 gallons, or 200 cubic feet (for gases) of acutely hazardous materials at their facilities are required to develop and submit a Risk Management Plan (RMP) to the appropriate local authorities, the designated local administering agency, and the USEPA for review and approval. The RMP is intended to satisfy Federal “right-to-know” requirements and provide basic information to regulators and first responders, including identification/quantification of regulated substances used

or stored on site, operational and safety mechanisms in place (including employee training), and potential on- and off-site consequences of release and emergency response provisions.

Under CHSC Sections 25500-25532, businesses handling or storing certain amounts of hazardous materials are required to prepare a Hazardous Materials Business Emergency Plan (HMBEP), which includes an inventory of hazardous materials stored on site (above specified quantities), an emergency response plan, and an employee training program. HMBEPs are also required to include a written set of procedures and information created to help minimize the effects and extent of a release or threatened release of a hazardous material, and must be prepared prior to facility operation (with updates and amendments required for appropriate circumstances such as changes in business location, ownership, or operations).

Pursuant to CHSC Chapter 6.11, CalEPA established the Unified Hazardous Waste and Hazardous Materials Management Regulatory Program (Unified Program), which consolidated a number of existing state programs related to hazards and hazardous materials. The Unified Program also allows the designation of Certified Unified Program Agencies (CUPAs) to implement associated state regulations within their jurisdiction. For businesses within the City, applicable hazardous materials plans (such as RMPs and HMBEPs) are submitted to and approved by the San Diego County Department of Environmental Health (DEH)/Hazardous Materials Division (HMD), which is the local CUPA as outlined below under County requirements.

Division 12 (Fires and Fire Protection) of the CHSC provides a number of standards related to fire protection methods, including requirements for the management of vegetation comprising a potential fire hazard under Part 5, Chapters 1 through 3.

Division 39 (Office of Environmental Health Hazard Assessment) establishes the Office of Environmental Health Hazard Assessment (OEHHA), which is the lead state agency for the assessment of health risks posed by environmental contaminants. OEHHA implements the Safe Drinking and Toxic Enforcement Act of 1986, commonly known as Proposition 65, and compiles the state's list of substances that cause cancer or reproductive harm. OEHHA also develops health-protective exposure levels for contaminants in air, water, and soil as guidance for regulatory agencies and the public.

Investigation and Cleanup of Contaminated Sites

The oversight of hazardous materials release sites often involves several different agencies that may have overlapping authority and jurisdiction. The DTSC and the RWQCBs are the two primary state agencies responsible for issues pertaining to hazardous material release sites. Investigation and remediation activities that would involve potential disturbance or release of hazardous materials must comply with applicable Federal, State, and local hazardous materials laws and regulations. DTSC has developed standards for the investigation of sites where hazardous materials contamination has been identified or could exist based on current or past uses. These regulations

would be applied during grading activities if, for example, previously unknown underground tanks or other potential contaminant sources were uncovered.

California Department of Forestry and Fire Protection - State Responsibility Areas System

Legislative mandates passed in 1981 (SB 81) and 1982 (SB 1916) require the CAL FIRE to develop and implement a system to rank fire hazards in California. Areas are rated as moderate, high, or very high based primarily on the assessment of different fuel types. CAL FIRE also identifies responsibility areas for fire protection, including Federal, State, and local responsibility areas (FRAs, SRAs, and LRAs, respectively).

5.16.2.3 Local

County of San Diego

The County DEH/HMD is the local CUPA and has jurisdiction over hazardous materials plans in the City. The County DEH/HMD also requires businesses that handle reportable quantities of hazardous materials, hazardous wastes, or extremely hazardous substances to submit a Hazardous Materials Business Plan (HMBP), which includes detailed information on the storage of regulated substances. The County DEH/HMD provides guidelines for the preparation and implementation of HMBPs, including direction on submittal requirements, covered materials, inspections, and compliance.

The DEH/HMD is also the administering agency for the San Diego County Operational Area Hazardous Materials Area Plan (County 2011). This Plan identifies the system and procedures used within the County to address hazardous materials emergencies and provides guidelines for topics such as transportation (including international crossings/inspections), industry/agency coordination, planning, training, public safety, and emergency response/evacuation.

The OES and Unified Disaster Council administer the MHMP, as outlined in Section 5.8.1.5 of the San Diego County Operational Area Hazardous Materials Area Plan. This Plan is generally intended to promote and provide a multi-jurisdictional approach to compliance with applicable regulatory requirements. The OES also administers the EOP (County 2014), which provides guidance for responding to major emergencies and disasters.

San Diego Air Pollution Control District

Per the California Air Toxics “Hot Spots” Information and Assessment Act (AB 2588), toxic air emissions in the region are regulated by the SDAPCD. A toxic air contaminant is defined as an *air pollutant that may increase a person’s risk of developing cancer and/or other serious health effects*. Approximately 800 chemical compounds have been identified as having potential adverse health effects.

Hazardous air pollutants in San Diego include the following types of businesses: chromium electroplating and anodizing; dry cleaning; aerospace manufacturing and rework facilities; shipbuilding and repair operations; halogenated solvent cleaning; ethylene oxide sterilizing; and miscellaneous organic chemicals process. Other types of businesses are considered hazardous air pollutants; however, they are not expected to be major contributors in San Diego. These include: gasoline distribution (bulk terminals), wood furniture manufacturing, boat manufacturing, printing and publishing, research and development facilities, and off-site waste and recovery operations.

The SDAPCD requires a review of businesses which may emit air contaminants from non-vehicular sources. The purpose of this review is to determine whether an Authority to Construct and Permit to Operate are required for certain equipment at the business. In addition, the review will determine whether notification is required for demolition and renovation projects involving asbestos. Permits and notifications help San Diego County protect the public health by attaining and maintaining ambient air quality standards and preventing public nuisance.

There are no set initial limitations or prohibited types of business in relation to closeness to sensitive receptors; however, during the permitting process some issues may arise that would need to be addressed or changed in order for standards to be met, though these are on a case specific basis. The only exception to this rule is, should the business dealing with hazardous materials be in the vicinity of a school (K-12), it must be a minimum distance of 1,000 feet away from the school. Notification of such use to the parents of each child in the school is also required.

City of San Diego

The Fire-Rescue Department implements the City Hazardous Materials Program (City 2018e), which requires applicable uses/processes related to hazardous materials to provide disclosure through submittal of a Hazardous Material Information Form and acquisition of an associated permit. The Hazardous Materials Program also includes guidelines and requirements for topics such as education, code enforcement, and safe business practices related to hazardous processes and the use/storage of hazardous materials.

The City's Local Enforcement Agency (LEA) enforces State minimum standards on public and private solid waste services within the City, including waste collection/disposal, illegal solid waste dumping, and hazardous solid waste sites requiring remediation. The City's ESD carries out Federal, State, and local waste management requirements, including requirements in the California Public Resources Code, such as AB 939, AB 341, and AB 1862, as well as requirements in the SDMC, including the People's Ordinance (collection), the Recycling Ordinance, the Construction and Demolition Debris Ordinance, and the Storage Ordinance. The City's ESD also works to move the City toward compliance with its Zero Waste Plan, which is part of its CAP.

The SDMC includes general hazardous materials regulations in Chapter 4 (Health and Sanitation), Sections 42.0801, 42.0901 (et seq.); and Chapter 5 (Public Safety, Morals and Welfare), Section

54.0701; as well as regulations regarding specific hazardous materials such as explosives (Chapter 5, Section 55.3301).

Chapter 14 (General Regulations) of the LDC also includes requirements pertaining to fire hazard concerns, such as brush management (Section 142.0412), adequate fire flow (Section 144.0240), and construction materials for development near open space (Section 145.0701 et seq.).

Emergency Response Plans

The City is a participating jurisdiction in the San Diego County MHMP, a Countywide plan to identify risks and minimize damage from natural and man-made disasters (County 2010, as amended through 2017). The primary goals of the MHMP include:

- Goal 1: Promote public understanding, support, and demand for hazard mitigation;
- Goal 2: Improve hazard mitigation coordination and communication with Federal, State, local, and tribal governments;
- Goal 3: Reduce the possibility of damage and losses to people, critical facilities/infrastructure, and State-owned facilities, due to wildfire/structural fire, coastal storms/erosion/tsunami, landslide, hazardous materials, and other manmade hazards;
- Goal 4: Reduce the possibility of damage and losses to people, critical facilities/infrastructure and State-owned facilities due to severe weather (e.g., El Niño storms, thunderstorms, lightning, tsunami, and extreme heat and drought);
- Goal 5: Reduce the possibility of damage and losses to people, critical facilities/infrastructure and State-owned facilities due to earthquake and dam failure; and
- Goal 6: Reduce the high probability of damage and losses to people, critical facilities/infrastructure, and State-owned facilities due to floods.

The SD-OHS oversees the City's Homeland Security, Disaster Preparedness, Emergency Management, and Recovery/Mitigation Programs. The primary focus of this effort is to ensure comprehensive emergency preparedness, training, response, recovery, and mitigation services for disaster-related effects. The SD-OHS also maintains the City EOC and an alternate EOC in a ready-to-activate status, ensures that assigned staff are fully trained and capable of carrying out their responsibilities during activations, and manages the EOC during responses to multi-department and Citywide emergencies to support incident response activities and maintain Citywide response capabilities.

Emergency Evacuation Plans

As noted above, the City is a participating agency in the County's Unified San Diego County Emergency Services Organization and County of San Diego Operational Area EOP (County 2014), which addresses emergency issues including evacuation. Specifically, Annex Q (Evacuation) of the Plan notes that: *Primary evacuation routes consist of major interstates, highways and prime arterials*

within San Diego County... I-5, I-8, I-805, I-15, and SR 163 identified as the primary evacuation routes in the project vicinity and Mission Valley community.

5.16.3 Impact Analysis

5.16.3.1 Issue 1

Issue 1 Would the project expose people or structures to a significant risk of loss, injury, or death involving wildland fires, including when wildlands are adjacent to urbanized areas or where residences are intermixed with wildlands?

Impact Threshold

Based on the City's CEQA Significance Determination Thresholds, impacts related to wildfire hazards could be significant impact if a project would:

- *Expose people or structures to a significant risk of loss, injury, or death involving wildland fires.*

Additionally, based on CEQA Guidelines Appendix G, if a project is location in or near State responsibility areas or lands classified as VHFHSZ, impacts could be significant if a project would:

- *Substantially impair an adopted emergency response plan or emergency evacuation plan.*
- *Due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose project occupants to, pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire.*
- *Require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or on-going impacts to the environment.*
- *Expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes.*

Analysis

For a discussion of emergency response plan and emergency evacuation plan, see the discussion under Issue 3, below.

As described in Section 5.16.1.6, a portion of the site is mapped within the VHFHSZ located along the San Diego River which traverses the project site. The City's Municipal Code requires brush management review on properties mapped within the VHFHSZ where habitable structures are located within 100 feet of areas with native and naturalized vegetation. Standard brush management zones consist of a 35-foot Zone One with a corresponding 65-foot Zone Two as measured from the façade of habitable structures. Modification of these standard zone widths is built into the brush management regulations.

Per Section 142.0412(f), the Zone Two width may be decreased by 1½-feet for each 1-foot increase in Zone One width. Under this allowance, where Zone One is expanded to 79 feet, Zone Two would be 0 feet. No formalized Brush Management program would be required beyond a 79-foot Zone One. Most structures within the project would be sited over 79 feet from the native and naturalized condition, separated from the fuel load through a combination of parcel setbacks and developed fire breaks such as the MTS Green Line Trolley tracks, the proposed Riverwalk River Park, the San Diego River Pathway, and various trails. Where the Zone One width is reduced, or where the equivalency of full brush management is not achieved per Section 142.0412(f), a project would be subject to alternative compliance measures as allowed under Section 142.0412(i) and in conformance with FPB Policy B-18-01. Brush management for the project is shown in Figure 5.16-3, *Brush Management*, development within Lots 36 through 40 would be separated from the native and naturalized condition by a brush management Zone One varying from 26 feet to 70 feet with no Zone Two, and therefore subject to alternative compliance. With implementation of alternative compliance measures, the project would meet the purpose and intent of the brush management regulations.

The project has been designed in accordance with and would be built to fire code requirements, including provision of fire hydrants and proper street/aerial access for emergency vehicles. The project has been reviewed by the City's Fire and Rescue Department, which has determined that the project is consistent with City regulations pertaining to fire protection.

While the project would construct internal roads to serve development within the Specific Plan area and would improve adjacent roadways (i.e., Fashion Valley Road and Hotel Circle North), the project does not require fuel breaks and emergency water sources. Power service for the project would require installation and connection of utilities. Construction and improvement of roadways and utility installation/connection would be done in accordance with City regulations and would not exacerbate fire risk or result in temporary or on-going impacts to the environment beyond what has been evaluated in this EIR.

As discussed in Section 5.11, *Geologic Conditions*, the project is not susceptible to landslides. Additionally, the project is not located in an area experiencing post-fire slope instability.

As evaluated in Section 5.12, *Hydrology*, the project would not result in increased risk associated with flooding. While the project may change drainage patterns, the project would provide storm water control facilities to manage storm water runoff.

Significance of Impacts

The project would comply with applicable State and City standards associated with fire hazards and prevention. Defensible space between habitable structures and the native/naturalized vegetation are provided through a combination of parcel setbacks and developed fire breaks such as the MTS Green Line Trolley tracks, the proposed Riverwalk River Park, the San Diego River Pathway, and various trails. Where the defensible space is reduced, alternative compliance measures would be

implemented. Construction and improvement of roadways and utility installation/connection would be done in accordance with City regulations and would not exacerbate fire risk. The project is not susceptible to landslides. Additionally, the project is not located in an area experiencing post-fire slope instability. The project would not result in increased risk associated with flooding, and would provide storm water control facilities would be constructed to manage storm water runoff. Therefore, potential impacts related to wildfire hazards would be less than significant.

Mitigation Measures

Mitigation would not be required.

5.16.3.2 Issue 2

Issue 2 Would the project result in hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within a quarter-mile of an existing or proposed school?

Impact Threshold

Based on the City's CEQA Significance Determination Thresholds, impacts related to health and safety could be significant if a project would:

- *The project proposes the handling, storage and treatment of hazardous materials, e.g., a Hazardous Waste Facility, falling under Municipal Code Section 141.1001 Hazardous Waste Research Facilities and Section 141.1002.*
- Result in hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within 1/4-mile of an existing or proposed school.

Analysis

The construction of the project would require the transport, temporary storage, and use of asphalt fuels, paints, and solvents, which could potentially be released and result in exposure to these chemicals. The use and handling of materials associated with the construction of the project would follow all applicable Federal, State, and local regulations. Uses associated with buildout of the Specific Plan may use minor amounts of hazardous materials such as cleaning solvents. Additionally, pesticides and herbicides would be used in landscape and park areas. However, usage would not be at levels that would result in substantial hazardous emissions or waste.

No schools are located within 0.25 mile of the project site, and no new SDUSD-operated school facilities are currently planned within 0.25 mile of the project site. The closest schools to the project site include the University of San Diego (USD), located just over a mile north of the project site, and two private schools: Francis Parker Lower School, located approximately 2.4 miles from the project site; and Francis Parker Middle and Upper School, located approximately 0.7 mile from the project site. A new public school is planned at the Civita development, which would be located approximately two miles from the project site. Other public schools located proximate to the project

site are Carson Elementary School (approximately two miles north of the project site), Alice Birney Elementary School (approximately three miles southeast of the project site), and Longfellow Elementary School (approximately five miles north of the project site). Thus, the project would not result in hazardous emissions or the handling of hazardous emissions or substances within 0.25 mile of a school.

Significance of Impacts

The project would not result in hazardous emissions or the handling of hazardous emissions and substances or waste within 0.25 mile of an existing or proposed school. Impacts would be less than significant.

Mitigation Measures

Mitigation would not be required.

5.16.3.3 Issue 3

Issue 3 Would the project impair implementation of, or physically interfere with, an adopted emergency response plan or emergency evacuation plan?

Impact Threshold

Based on the City's CEQA Significance Determination Thresholds, impacts related to health and safety could be significant if a project would:

- *Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan.*

Analysis

Construction

Construction of the project could require temporary detours and/or lane closures that could temporarily disrupt travel along existing roadways for periods of time within the construction zone. Emergency access to all surrounding properties, however, would be maintained throughout the construction period. In addition, a traffic control plan and haul route plan would be prepared and implemented as a standard City requirement during project construction. With implementation of these plans, the project would not impede access to publicly or privately-owned land and would not interfere with emergency response during construction. Therefore, no significant public safety impacts related to emergency services would occur during construction.

Fire Emergency Access

The project would provide adequate emergency access within the site. Access for emergency vehicles would be provided at the main project entries along Friars Road, Fashion Valley Road, and Hotel Circle North. Internal roadways would meet the City Fire Marshal's standards. Additional emergency requirements, such as fire hydrants, fire hydrant markers (i.e., blue reflectors installed in the roadway), adequate vertical clearances, adequate turning radii, and fire ladder clearances, would be provided in accordance with City requirements. In addition, the signalized main access driveway would be equipped with signal pre-emption devices to assist emergency vehicles. Proposed buildings would be constructed with fire-resistant construction materials and would include a protective system of fire sprinklers, as required.

Evacuation

Primary evacuation routes consist of the major interstates, highways, and prime arterials within the City. For the project site, identified evacuation routes include I-8 south of the project site; I-805, SR-163, and I-15 to the east; and I-5 to the west. Friars Road on the north, Fashion Valley Road on the east, and Hotel Circle North on the south provide local access to the freeways and to SR-163. The project would construct public road connections to these adjoining streets. A County of San Diego Emergency Plan, including an Evacuation Annex, is in place to provide for the effective mobilization of all the resources of San Diego. The project would not impair implementation of, or physically interfere with, the San Diego Emergency Plan. Additionally, future development within the Specific Plan would be subject to review by the Fire-Rescue and the SDPD to ensure compliance with applicable safety standards.

In conjunction with the improvements to Fashion Valley Road, automated gates would be installed adjacent to the road to restrict traffic when the river reaches the level at which it crosses over the roadway. The gates would be connected to sensors in the river, which would measure the water level and would trigger the gates to close Fashion Valley Road to traffic, across the culvert, in a north and south direction. These automated gates would direct the flow of traffic during a heavy rain event, preventing unsafe attempts to cross the San Diego River, as well as unnecessary vehicular traffic on Fashion Valley Road when crossing is not possible.

Significance of Impacts

The project would be designed in accordance with applicable safety standards. The project would not impair implementation of, or physically interfere with, an adopted emergency response or emergency evacuation plan; impacts would be less than significant.

Mitigation Measures

Mitigation would not be required.

5.16.3.4 Issue 4

Issue 4 Would the project be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, create a significant hazard to the public or environment?

Impact Thresholds

Based on the City's CEQA Significance Determination Thresholds, a project could result in a significant impact associated with health and safety if one or more of the following would apply:

- Located on or near known contamination sources.
- Located within 1,000 feet of a known contamination site.
- Located within 2,000 feet of a known "border zone property" (also known as a "Superfund" site) or a hazardous waste property subject to corrective action pursuant to the Health and Safety Code.
- Has a DEH site file closed.
- Located in Centre City San Diego, Barrio Logan, or other areas known or suspected to contain contamination sites.
- Where dewatering is involved, prior to issuance of any permit that would allow excavation which requires dewatering, a plan for disposal of the dewatering effluent and a permit, if needed, from the Regional Water Quality Control Board or the Industrial Waste Division of MWWDD, shall be provided to LDR by the applicant. A Dewatering Discharge Permit (NPDES No. CA 1018804) shall be obtained for the removal and disposal of groundwater (if necessary) encountered during construction. Discharge under this permit will require compliance with a number of physical, chemical, and thermal parameters (as applicable), along with pertinent site-specific conditions, pursuant to direction from the RWQCB. Wells, including test wells, and soil percolation tests are not considered dewatering activities.

Analysis

The project site is not located in the Centre City San Diego, or Barrio Logan. However, as described in Section 5.16.1, *Existing Conditions*, the project site was evaluated to determine if there are any on-site or off-site facilities located proximate to the project site that would cause a health risk or safety issue. Based on research conducted, the site is located in an area where suspected or known contamination sites – both on-site and off-site – have been identified.

Off-site Facilities

Off-site facilities listed in the Radius Map report referenced in Section 5.16.1, *Existing Conditions*, have been identified as located within 0.5-mile radius of the site and were evaluated according to their potential to impact the project site. The facilities were evaluated based on the following factors:

- Reported distance from the project site;

- The nature of the database on which the facility is listed and/or whether the facility was listed on a database reporting unauthorized releases of hazardous materials, petroleum products, or hazardous wastes;
- Reported case type (e.g., soil only, failed UST test only);
- Reported substance released (e.g., chlorinated solvents, gasoline, metals);
- Reported regulatory agency status (e.g., case closed, “no further action”); and
- Location of the facility with respect to the reported groundwater flow direction and depth to groundwater.

Due to one or more of the factors above, there is a low likelihood that the off-site facilities listed in the Radius Map report represent a recognized environmental condition in connection with the project site. However, based on proximity to the project site, as well as listings on various databases, additional research was conducted for select sites as presented below:

ARCO, 6899 Friars Road

This facility is located approximately 500 feet northwest of Area 1 and has been in operation as a gas station since before 1969. It currently functions as an AM/PM convenience store and gasoline station with four 10,000-gallon USTs and associated piping and dispensers. Two petroleum hydrocarbon-related releases occurred on this site, resulting in two open cases. The first open case was opened in December 1994 following discovery of a fuel release during the removal of one 550-gallon UST. The second case was subsequently opened in October 1995 as a result of the detection of additional contamination during the removal of four 6,000-gallon USTs and one 8,000-gallon UST. Site investigations identified significant soil and groundwater impacts in the area of the former USTs. The primary contaminants of concern (COCs) were compounds related to petroleum hydrocarbons. A corrective action plan (CAP) was submitted April 4, 2008 and accepted by DEH for implementation with remediation by natural attenuation as the most cost effective remedial measure. Based on the acceptance and implementation of the CAP by the DEH and ongoing monitoring, there is a low likelihood that a recognized environmental condition exists at the project site in connection with this facility.

6110 Friars Road

This facility is located adjacent to the north of Area 1. A listing on the EDR Historical Cleaners database indicates that a historical dry cleaner facility was present between the approximate years of 1980 and 2012. A Geotracker search and request to the DEH yielded no evidence of regulatory records associated with a dry-cleaning facility or a release of hazardous materials or waste at this location. Based on the absence of disposal violations, regulatory records, and the lack of known and reported releases, there is a low likelihood that a recognized environmental condition exists at the project site in connection with this facility.

6416 Friars Road

This facility is located adjacent to the north of Area 1. A listing on the EDR Historical Auto Stations database indicates that a historical automobile service station was present at this location in 2001. A

Geotracker search and request to the DEH yielded no evidence of regulatory records or a release of hazardous materials or waste at this location. Based on the absence of disposal violations, regulatory records, and the lack of known and reported releases, there is a low likelihood that a recognized environmental condition exists at the project site in connection with this facility.

Stardust Golf Course

This facility is located within Area 1. According to DEH files, one 2,000-gallon gasoline UST and one 550-gallon waste oil UST were reported removed from this location on February 1, 1988. It was reported that impacted soil in the immediate vicinity of the removed USTs was also removed and replaced. The case was closed by the DEH on June 4, 1990. Based on the depth to groundwater and the closed nature of the case, there is a low likelihood that a recognized environmental condition exists at the project site in connection with this facility.

ARCO, 2085 S Hotel Circle

This facility is located approximately 450 feet southwest of Area 2. A County of DEH case closure letter described that *[five] USTs were removed in 1984 prior to regulation by DEH and no inspector was present at the time of removal. A Phase II assessment for a real estate transition in 1988 identified both soil and groundwater contamination. Follow-up site assessment activities showed the impact to soil was limited to the former USTs and piping systems...To remediate the soil and groundwater impacts, ARCO initiated an on-site vapor extraction system (VES) in early 1994...Groundwater monitoring from November 1991 through November 1998 has demonstrated that dissolved groundwater contamination plume is stable...Based on the limited extent of contamination, the stability of the dissolved plume, and the City of San Diego input regarding their potential use of groundwater in this basin, no further remedial action is appropriate.* Based on the directional flow of groundwater, there is a low likelihood that a recognized environmental condition exists at the project site in connection with this facility.

Southwest Leasing/Atlas Hotels/Avon Car Rental, 1111 Fashion Valley Road

This facility is located adjacent to the east of Area 2. According to the UST closure report for this location, a 10,000-gallon gasoline tank was excavated from approximately 12 feet below grade and removed from the property in good condition. Soil samples taken from within the proximity of the tank had non-detectable concentrations of hydrocarbons. Based on the absence of disposal violations and the lack of known and reported releases, there is a low likelihood that a recognized environmental condition exists at the project site in connection with this facility.

HAZNET Database

Various facilities adjacent to the south and east of Area 3 were reviewed based on their listings in the Hazardous Waste Information System (HAZNET) database and proximity to the project site. These locations include: the Handlery Hotel & Country Club; Douglas All Red Company; CT Hotel; Essex Realty Management, Inc.; and Town & Country Resort. However, based on the types and quantities of hazardous materials, the absence of disposal violations, and the lack of known and reported releases, there is a low likelihood that a recognized environmental condition exists at the project site in connection with these facilities.

Hotel Circle 76 Station: 504 Hotel Circle North

A gasoline leak from a former UST took place at this location in 1989, approximately 366 feet to the east/southeast from Area 3. The DEH provided a no further action letter dated August 17, 1992, stating that no further action is required based on site characterization and mitigation activities performed. Based on the distance of this former reported release from the site, the reported assessment and mitigation activities performed, and the case closed status, there is a low likelihood that this facility represents a recognized environmental condition to the project site.

With the possible exception of historic auto repair and possible dry cleaning operations as discussed above, no obvious historical facilities, features of concern, or land uses indicative of the use, storage, or generation of hazardous materials/wastes or petroleum products were found in any of the historical resources reviewed for off-site land uses within the vicinity of the project site. Relative to the historic auto repair facility and the historic dry cleaner facility, based on the absence of disposal violations, regulatory records, and the lack of known and reported releases, there is a low likelihood that a recognized environmental condition exists at the project site in connection with this facility.

An Envirofacts search was conducted in January 2019. The USEPA has established Envirofacts as a multi-system search tool that enables users to search multiple environmental database for facility information, including toxic chemical releases, water discharge permit compliance, hazardous waste handling processes, and air emissions estimates. The Envirofacts search yielded no results for any EPA-regulated facilities or known contamination sources anywhere on or within 1,000 feet of the project site.

On-Site Conditions

In order to determine if there are any known contamination sources located on the project site, Phase I ESAs were conducted by SCS Engineers. The Phase I ESAs divided the plan area into three areas, Areas 1, 2, and 3, as described above in Existing Conditions, *Project Site Subareas for Purposes of the Hazardous Materials Evaluations*. Subsurface Assessments were also performed by SCS Engineers to further assess the potential recognized environmental conditions of the plan area identified by the Phase I ESAs for each respective area of the project site.

An inground wastewater clarifier was observed within Area 1, along with several USTs that had been previously removed from the project site. Inground wastewater clarifiers have the potential to release wastewater products. This potential increases over time as inground wastewater clarifier systems age. Due to the interpreted age of the clarifier at the site (over 60 years), there is a moderate likelihood that releases have occurred and that an associated recognized environmental condition exists at the site. In addition, two water wells were observed at the southeast portion of Area 3 in a portion of the project site adjacent to Hotel Circle North. The possible environmental concerns with water wells are the direct access by contaminants to groundwater they allow, if improperly sealed or screened.

To assess the former USTs and the existing wastewater clarifier in Area 1, five borings were conducted in order to collect and analyze soil samples from various depths below grade. Because groundwater was not encountered at the maximum proposed boring depths of Areas 1 and 2, no groundwater samples were collected. One water sample was collected from one of the existing groundwater wells at Area 3.

Soil samples were collected from each boring location at depths of approximately 0.5, 1.5, and 3.0 feet below ground surface (bgs) and analyzed for the possible presence of organochlorine pesticides, chlorinated herbicides, and arsenic in connection with historical and current use of pesticides at the project site. The subsurface investigation for pesticides involved 18 borings in Area 1, eight borings in Area 2, and 11 borings in Area 3. No detectable concentrations of TPH or VOCs were reported in the soil samples collected from Area 1, where former USTs were excavated. While organochlorine pesticides were detected above laboratory reporting limits in Areas 2 and 3, no samples were above their respective RSLs or CHHSLs. No detectable concentrations of TPH or organochlorine pesticides were reported in the groundwater sample collected from the well in Area 3. Therefore, there is a low likelihood that significant residual petroleum hydrocarbons are left in place from the previous release reported in this portion of the project site.

Arsenic concentrations at all three areas exceeded the CHHSL and RSL in all samples. However, arsenic is commonly present in California soils in concentrations that exceed risk criteria under naturally occurring conditions, and the arsenic concentrations in shallow soil at the project site are within naturally occurring background concentrations. Thus, these concentrations do not appear to be indicative of a release of arsenic.

The ESAs concluded that no obvious indications were observed that a release of hazardous materials/wastes or petroleum products had occurred within the project site. However, based on the laboratory results, current regulatory guidelines, and conclusions presented in the Subsurface Assessment, there is the potential for the presence of arsenic and organochlorine pesticides in soil within the project site. Therefore, in order to avoid the potential health risks associated with grading and excavation of soils potentially containing hazardous materials, the following shall be made conditions of project approval. Prior to site development but subsequent to the completion of grading plans, additional shallow sampling for arsenic and organochlorine pesticides shall be conducted.

- If soil is ultimately exported from the project site, additional soil sampling and analysis shall be required. Any soil exported from the project site must be properly managed and transported to an appropriately permitted facility, if it is characterized as a regulated or hazardous waste.
- The project shall develop a site-specific soil management plan in order to account for project site development activities and integrate environmental issues into the project site development process.

For Area 3, additional research of the production well shall occur in order to better understand what the groundwater data are representative of. Once this research is completed, additional groundwater sampling may be required.

Significance of Impacts

Due to the presence of previously removed USTs along with the existing wastewater clarifier, there is the potential for the presence of arsenic and organochlorine pesticides in soils within the project site. The project would be required to implement specific recommendations outlined in the Subsurface Assessment, and compliance with Federal, State, and local regulations would ensure the impact would be less than significant.

Mitigation Measures

Mitigation would not be required.

5.16.3.5 Issue 5

Issue 5 Would the project expose people to toxic substances, such as pesticides and herbicides, some of which have long-lasting ability, applied to the soil during previous agricultural uses?

Impact Threshold

Based on the City's CEQA Significance Determination Thresholds, impacts related to health and safety could be significant if a project would be:

- *Located on a site presently or previously used for agricultural purposes and pesticides are routinely used during agricultural operations.*

Analysis

As described in the Phase I, historical aerial photographs of the project site dating back to 1949 show that agricultural activities took place at the project site and in the site vicinity from circa 1915 to the mid-1940s. These activities possibly took place at the time when organochlorine and metals-based pesticides were in wide general use for pest or weed control. These classes of pesticides are known to have the potential to remain in detectable concentrations in the subsurface for extended periods of time.

The California Environmental Protection Agency developed a guidance document titled *Use of California Human Health Screening Levels (CHHSLs) in Evaluation of Contaminated Properties*. CHHSLs can be used to screen sites for potential human health concerns where releases of hazardous chemicals to soils have occurred. An additional guidance document titled *Regional Screening Levels (RSL) Summary Table* was developed by the EPA to *provide default screening tables and a calculator to assist [...] with decision making concerning CERCLA hazardous waste sites and to determine whether levels of contamination found at the site may warrant further investigation or site cleanup, or whether no*

further investigation or action may be required. The contaminants of concern for this project site were conservatively compared to their respective residential CHHSL or RSL, whichever was lower.

Some of the tested organochlorine pesticide samples, including chlordane, dieldrin, DDE, and DDT, were detected above their respective laboratory reporting limits. However, none of the samples in Areas 1 and 2 were above their respective RSLs or CHHSLs. One sample collected from the western portion of Area 3 was reported to exceed the CHHSL and RSLs for chlordane and dieldrin, respectively. A soil sample collected in this same location did not contain chlordane or dieldrin above the laboratory reporting limits.

There is a moderate likelihood that residual concentrations of organochlorine and metals-based pesticides are present in the soil beneath the project site. Assuming the legal and permitted application of these pesticides along with the assumption that existing site use remains the same, this common occurrence is unlikely to lead to a health risk or enforcement action. Nonetheless, grading activities associated with development of the project site could result in the disturbance of soils where agricultural activities occurred in the past. These soils could have been applied with toxic substances such as pesticides and herbicides. Therefore, in order to avoid the potential health risks associated with grading and excavation of soils that may contain residual concentrations of organochlorine and metals-based pesticides, the following shall be made conditions of project approval.

- Limited soil sampling shall be conducted as a precautionary measure to ensure that future occupants of the project site are not exposed to elevated concentrations of COCs, if present. If contaminated soils are encountered, the soil would be classified as hazardous or regulated waste. Regulations are in place that shall be followed for disposal of classified and regulated waste. In addition, if soil is excavated and exported as a part of redevelopment activities, soil sampling shall be conducted to assess whether the soil contains concentrations of COCs that would cause the soil to be classified as hazardous or regulated waste.

Significance of Impacts

There is a moderate likelihood that residual concentrations of organochlorine and metals-based pesticides are present in the soil beneath the project site, which could pose health risks associated with grading and excavation of soils. The project would be required to implement specific recommendations outlined in the Subsurface Assessment, and compliance with Federal, State, and local regulations would ensure the impact would be less than significant.

Mitigation Measures

Mitigation would not be required.

5.16.3.6 Issue 6

Issue 6 Would the project result in a safety hazard for people residing or working in a designated airport influence area?

Impact Thresholds

Based on the City's CEQA Significance Determination Thresholds, impacts related to health and safety could be significant if a project would be:

- Be located *in a designated airport influence area and where the Federal Aviation Administration (FAA) has reached a determination of "hazard" through FAA Form 7460- 1, "Notice of Proposed Construction or Alteration" as required by FAA regulations in the Code of Federal Regulations (CFR) Title 14 §77.13; or*
- Be inconsistent with an Airport's Land Use Compatibility Plan.

Analysis

The project site is located within AIAs of San Diego International Airport and Montgomery Field. The project site is located within the Overflight Notification Area of the San Diego International Airport, as shown in Figure 5.16-5, *San Diego International Airport Compatibility Policy Map: Overflight*. An Overflight Notification is a buyer awareness tool that ensures prospective buyers of residential land use development near an airport are informed about the airport's potential impact on the property. As shown in Figure 5.16-6, *San Diego International Airport Airspace Protection Boundary*, the project site is located within the Airspace Protection Boundary for the San Diego International Airport, but outside of the FAA Part 77 certification of non-obstruction area. The project site is located outside of the noise contours and safety zones for San Diego International Airport.

The proposed project has been determined to be consistent with the San Diego International Airport and Montgomery-Gibbs Executive Airport ALUCPS by the SDCRAA (see Appendix Z: *ALUC Consistency Determination Letters*). Based on the Consistency Determination Letter, the ALUC found the project to be consistent with the Montgomery Field ALUCP.

A portion of the project site is located within the FAA Height Notification Boundary of Montgomery Field, as shown in Figure 5.16-7, *Montgomery Field ALUCP: Part 77 Airspace Protection*. The Part 77 Height Notification Boundary extends 20,000 feet from the nearest point of any runway. Within the boundary, Part 77, Subpart B requires that the FAA be notified of any proposed construction of alteration having a height greater than an imaginary surface extending 100 feet outward and one foot upward (slope of 100 to one) from the runway elevation. The project site is more than five miles from Montgomery-Gibbs Executive Airport and within Mission Valley, which sits below the mesa where Montgomery Field is located. Tallest structures would be 247 feet in height AMSL. The FAA determined that the project would not result in any hazard to air navigation (see Appendix Y, *FAA*

Determination of No Hazard Letters). The project would not result in obstruction to airport operations from Montgomery-Gibbs Executive Airport.

Significance of Impacts

Although the project site is within the AIAs of San Diego International Airport and Montgomery-Gibbs Executive Airport, the project would not result in impacts associated with the four compatibility concern areas. As a result, impacts would be less than significant.

Mitigation Measures

Mitigation would not be required.

5.16.3.7 Issue 7

Issue 7 Would the project result in a safety hazard for people residing or working within two miles of a private airstrip or a private airport or helicopter facility that is not covered by an adopted Airport Land Use Compatibility Plan?

Impact Thresholds

Based on the City's CEQA Significance Determination Thresholds, impacts related to health and safety could be significant if a project would:

- *Result in a safety hazard for people residing or working within two miles of a private airstrip by a private helicopter facility that is not covered by an adopted Airport Land Use Compatibility Plan.*

Analysis

As identified previously in 5.16.1, in addition to the helipads located at the Montgomery-Gibbs Executive Airport and the SDIA, there are private heliports within a two-mile radius of the project site. These include: a heliport at the Hazard Center Office Tower, located approximately 1.3 mile east of the project site; at UCSD Medical Center and at Scripps-Mercy Hospital, located approximately 1.5 miles south of the project site; and at the Sharp Hospital, located approximately 3.5 miles northeast of the project site. (See Figure 5.16-4, *Helipad/Heliport Locations*.) There are no private airstrips within a two-mile radius of the plan area. There would be no project structures that would impair heliport or private airstrip operations. Any helicopter operations associated with either the office building or medical facilities would be undertaken in accordance with FAA safety and flight regulations. As a result, the project would not have an impact on the safety of aircraft activity at heliports or private airstrips near the project site and would not result in a safety hazard for people residing or working within two miles of a private airstrip or heliport facility.

Significance of Impacts

Future buildout of the Specific Plan would not have an impact on people residing or working within 2 miles of a private airstrip or heliport facility. There would be no structures that would impair heliport or private airstrip operations and all helicopter operations would be done in accordance with FAA regulations. Impacts would be less than significant.

Mitigation Measures

Mitigation would not be required.

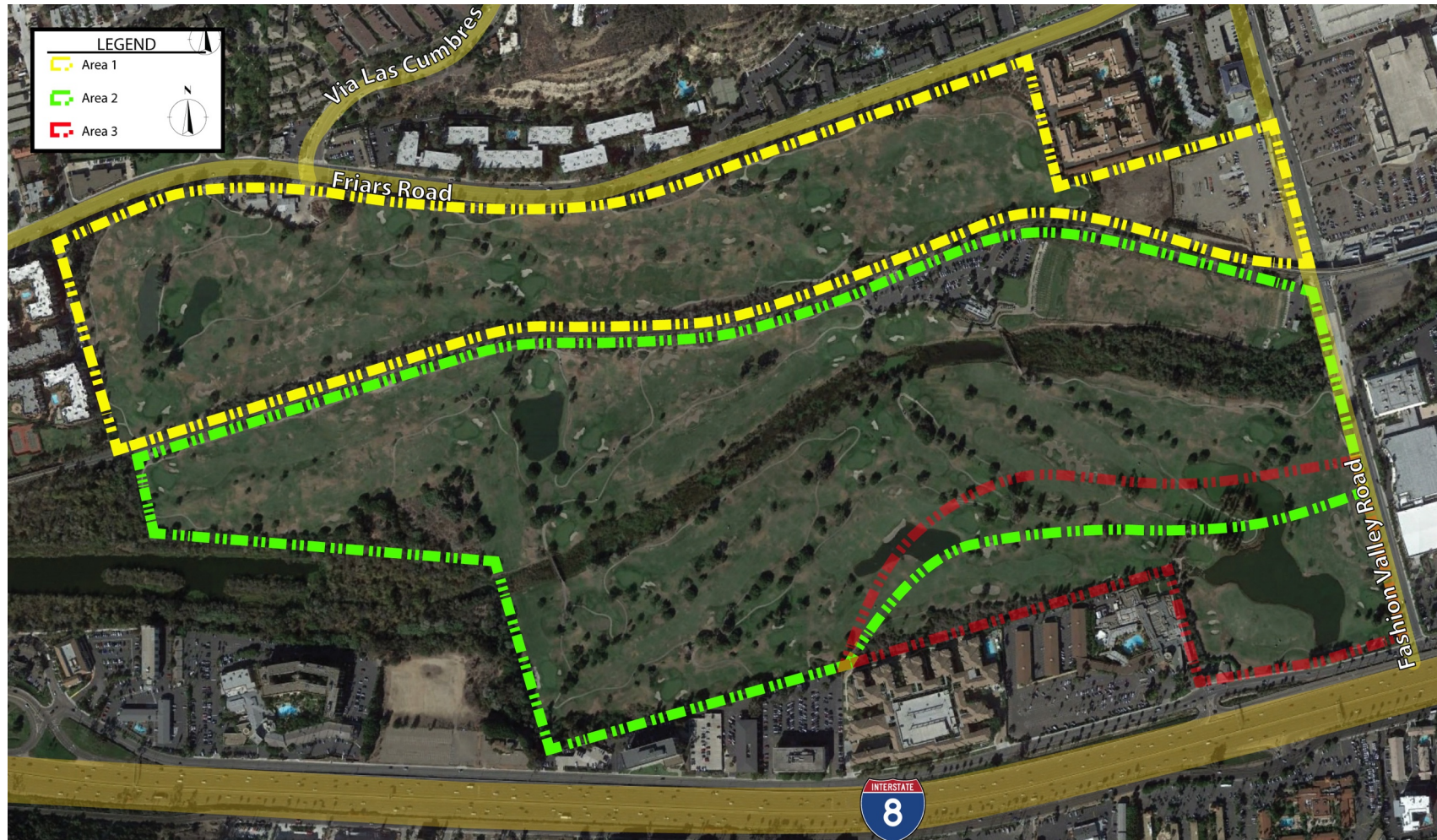
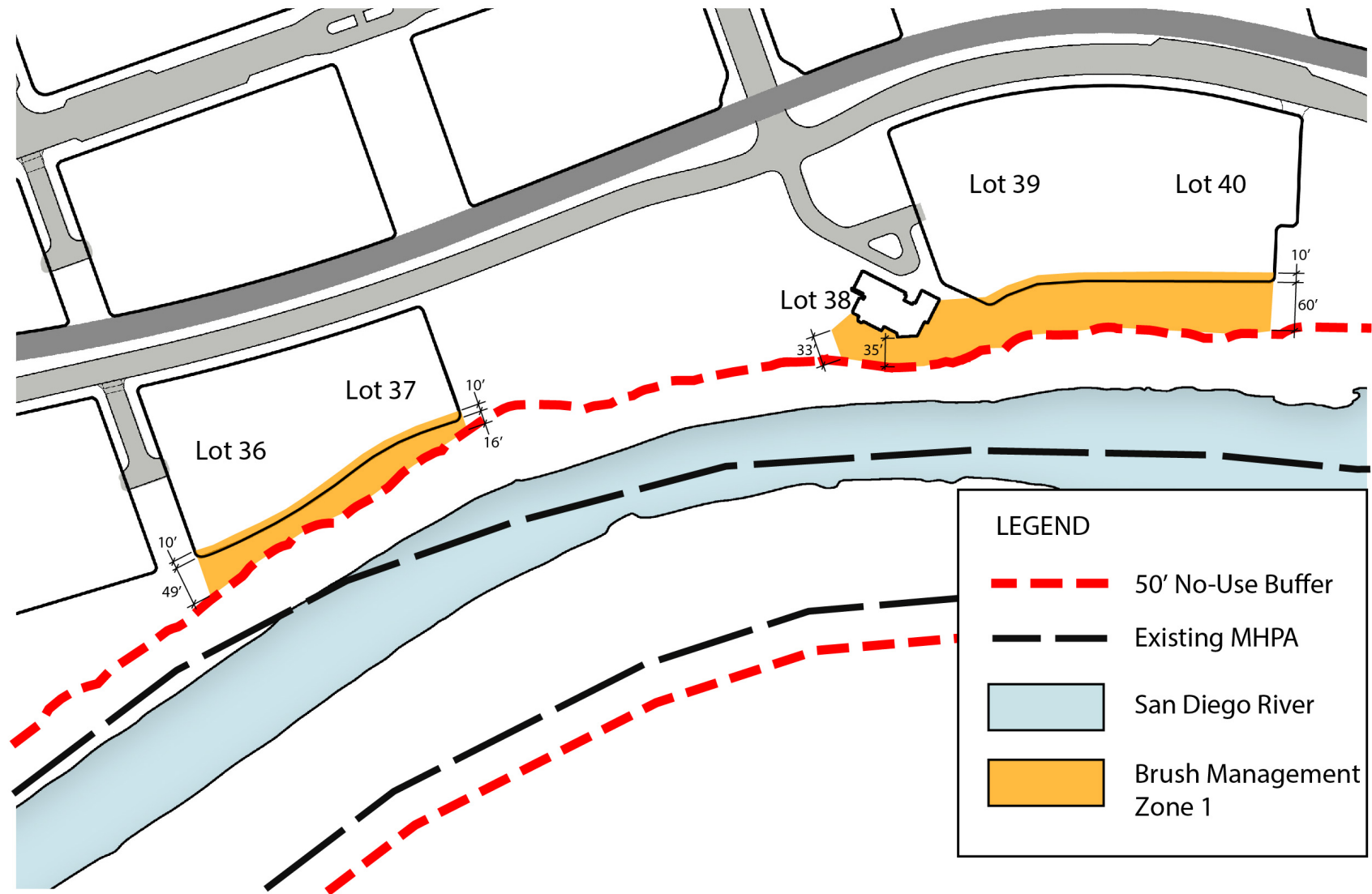


Figure 5.16-1. Project Site Subareas for Purposes of Hazardous Materials Evaluations



Figure 5.16-2. Location of Sensitive Receptors

Figure 5.16-3. *Brush Management*

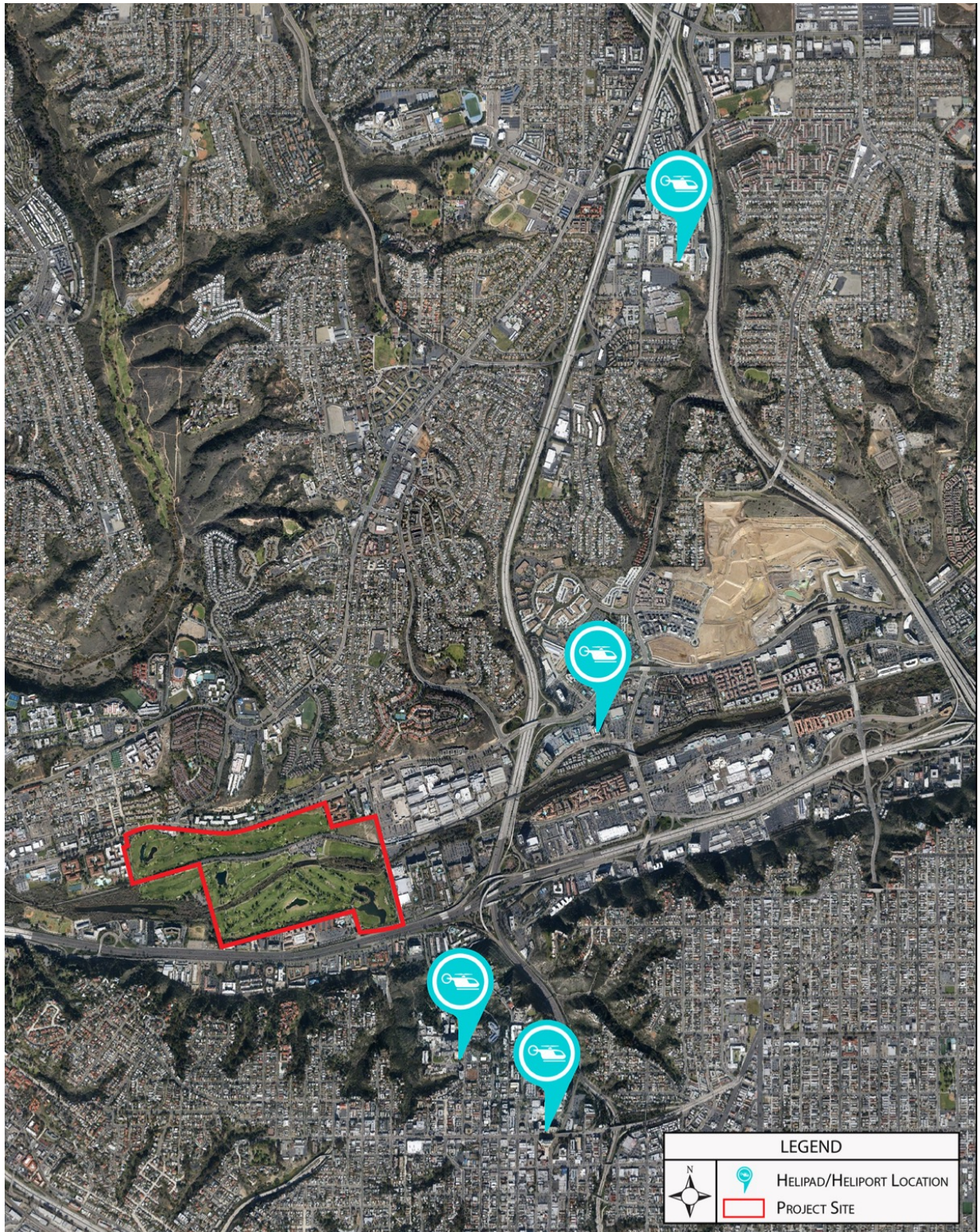


Figure 5.16-4. Helipad/Heliport Locations

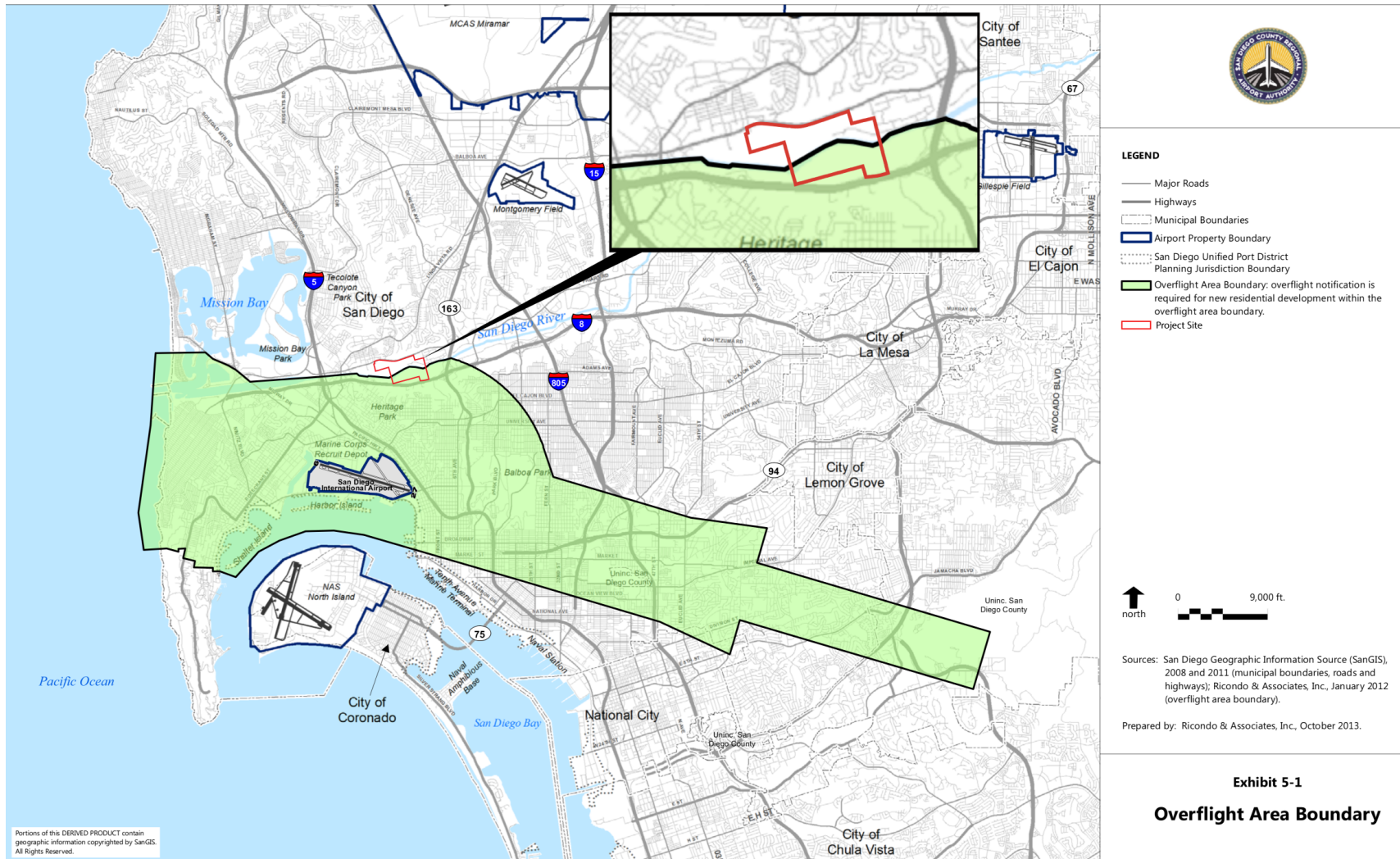


Figure 5.16-5. San Diego International Airport Compatibility Policy Map: Overflight

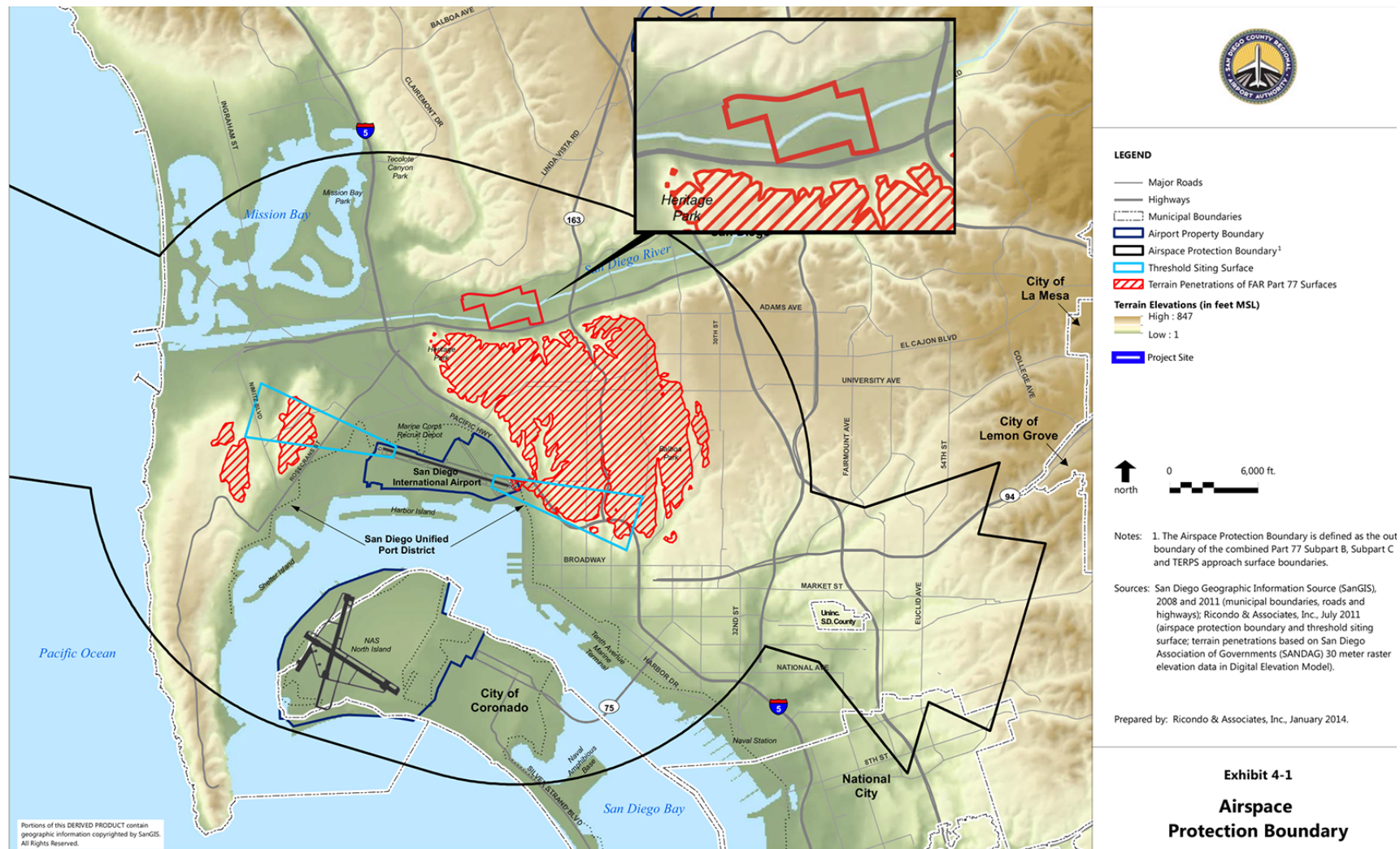


Figure 5.16-6. San Diego International Airport Airspace Protection Boundary

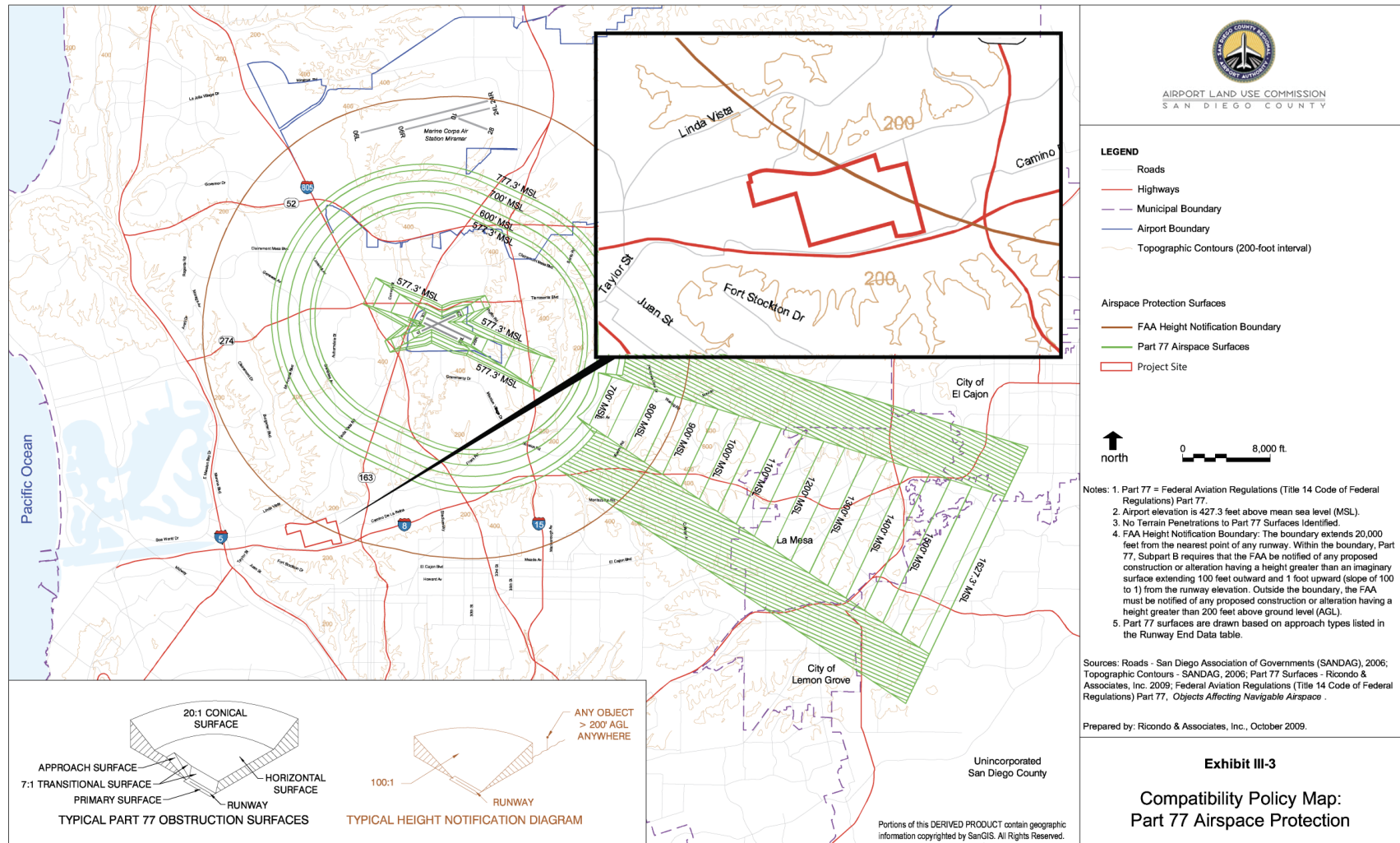


Figure 5.16-7. Montgomery Field Airport Compatibility Policy Map: Part 77 Airspace Protection

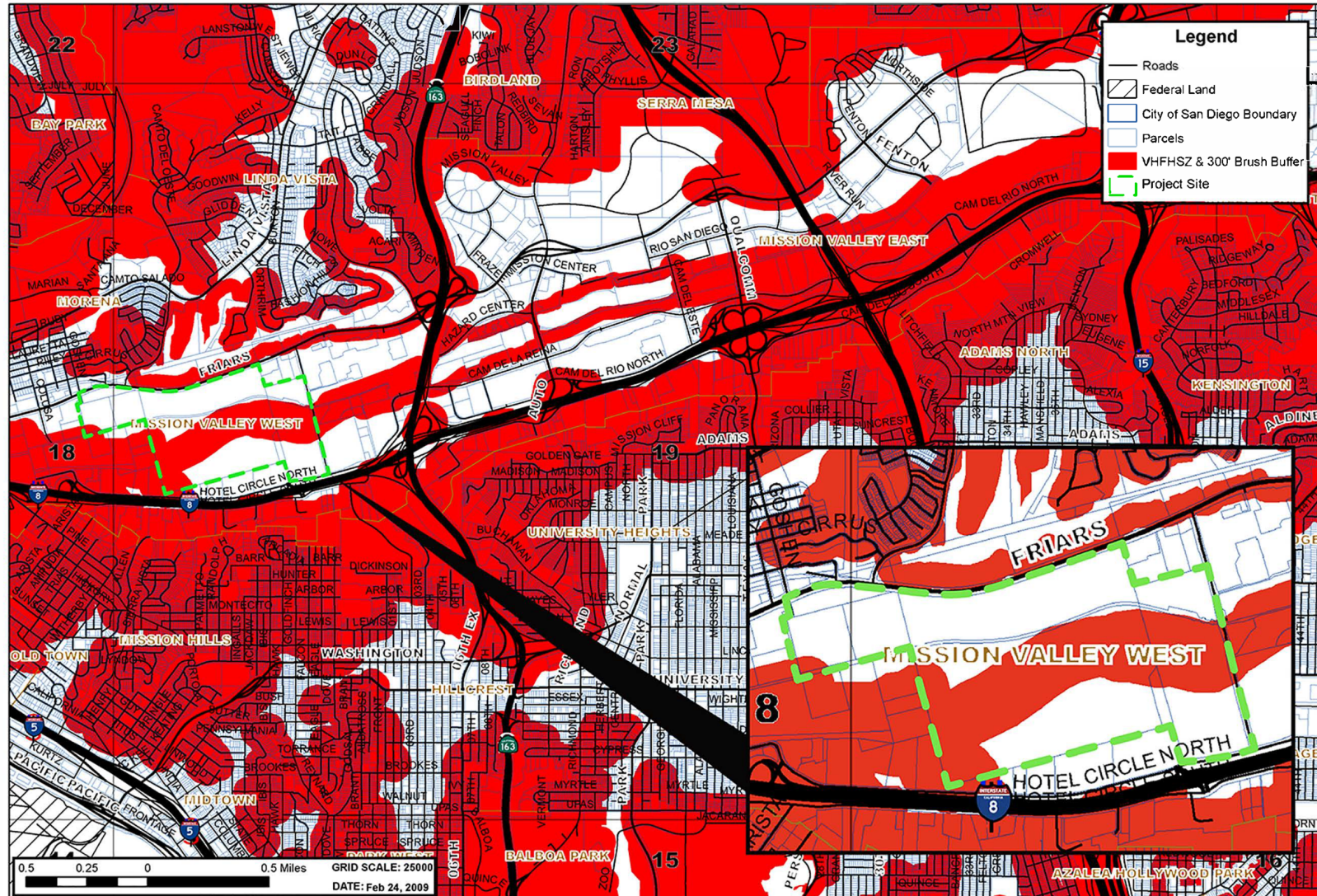


Figure 5.16-8. Very High Fire Hazard Severity Zone Map

6.0 CUMULATIVE EFFECTS

Section 15355 of the State CEQA Guidelines defines “cumulative impacts” as *two or more individual effects which, when considered together, are considerable or which compound or increase other environmental impacts*. These individual effects may be changes resulting from a single project or a number of separate projects and can result from individually minor but collectively significant projects taking place over a period of time.

The CEQA Guidelines Section 15130 provides guidance for analyzing cumulative impacts and requires that an EIR address cumulative impacts of a project *when the project’s incremental effect would be cumulatively considerable*. Cumulatively considerable, as defined in Section 15065(a)(3), *means that the incremental effects of the individual project are considerable when viewed in connection with the effects of past projects, other current projects and the effects of probable future projects*. Where a lead agency determines the project’s incremental effect would not be cumulatively considerable, a brief description of the basis for such a conclusion must be included. In addition, the CEQA Guidelines allow for a project’s contribution to be rendered less than cumulatively considerable with implementation of appropriate mitigation.

According to Section 15130(b) of the CEQA Guidelines, the *discussion of cumulative impacts shall reflect the severity of the impacts and their likelihood of occurrence, but the discussion need not provide as great detail as is provided for the effects attributable to the project alone. The discussion should be guided by the standards of practicality and reasonableness, and should focus on the cumulative impact to which the identified other projects contribute rather than the attributes of other projects which do not contribute to the cumulative impact*. The evaluation of cumulative impacts is to be based on either:

- *A list of past, present and probable future projects producing related or cumulative impacts including, if necessary, those projects outside the control of the agency; or*
- *A summary of projections contained in an adopted general plan or related planning document, or in a prior environmental document which has been adopted or certified, which described or evaluated region- or area-wide conditions contributing to the impacts, including, if necessary, those projects outside the control of the agency; or cumulative impact. Any such planning document shall be referenced and made available to the public at a location specified by the lead agency.*

This EIR utilizes the “Plan” approach for the project’s cumulative analysis in accordance with CEQA Section 15130(b). CEQA Section 15130(e) identifies *If a cumulative impact was adequately addressed in a prior EIR for a community plan, zoning action, or general plan, and the project is consistent with that plan or action, then an EIR for such a project should not further analyze that cumulative impact, as provided in Section 15183(j)*. According to CEQA Section 15152(f)(3), adequately addressed means mitigated or avoided by the prior EIR, or examined in detail sufficient to allow impacts to be mitigated or avoided by site specific project conditions. CEQA also provides that cumulative impacts

caused by other projects do not necessarily mean the project undergoing environmental review has its own cumulative impacts. CEQA Guidelines Sections 15130 (d) and (e), 15064(h), and 15152(f)(3).

The Mission Valley CPU Program EIR adequately addressed cumulative impacts from buildout of the Mission Valley Community Plan for the environmental resources areas addressed in the CPU Program EIR. The City CEQA findings for the Mission Valley Community Plan EIR found cumulatively considerable impacts for the following resource issue areas: (1) air quality (conflicts with air quality plans and air quality standards); (2) historical, cultural, and tribal cultural resources; (3) hydrology and water quality (flooding and drainage patterns from riverine flooding); (4) noise (increase in ambient noise, land use compatibility, and construction noise); (5) public services and facilities; (6) public utilities and infrastructure; and (7) transportation (traffic circulation – roadway segments, intersections, and freeway facilities).

Consistent with CEQA Guidelines 15130(d), this section summarizes and incorporates by reference for purposes of tiering from the Mission Valley CPU PEIR cumulative effects analysis that adequately addresses each resource issue area. It analyzes the site-specific project-level cumulative impacts from the project without assuming that the project's cumulative impacts are the same as the seven cumulatively considerable and unmitigated impacts identified the Mission Valley CPU Program EIR. In doing so, this analysis identifies whether the City's CEQA findings for why the Mission Valley CPU Program EIR found cumulatively considerable and unmitigable impacts are applicable to the project, and whether there are alternatives available to avoid those cumulatively considerable impacts that are applicable to the project.

The cumulative analysis included in the Mission Valley CPU Program EIR assumes buildout of the Mission Valley Community Plan and, because it tiers of the General Plan's analysis of cumulative effects, anticipated development in surrounding communities known at the time the CPU Program EIR was developed. The Morena Corridor Specific Plan project post-dates the Mission Valley CPU and, therefore, was not anticipated in the cumulative effects analysis for the Mission Valley CPU Program EIR. Therefore, the cumulative effects analysis for the project includes buildout of the Morena Corridor Specific Plan to ensure its cumulative effects when combined with the Mission Valley Community Plan buildout, of which the project has been included, would not result in one or more new cumulative effects.

6.1 Plans Considered for Cumulative Effects Analysis

The following is a description of the planning documents utilized in the cumulative effects analysis. All plans discussed in this section are herein incorporated by reference.

6.1.1 Mission Valley Community Plan

The Mission Valley Community Plan provides a road map for future development and promotes the creation of walkable, mixed-use community areas, better connectivity, increased spaces for parks

and recreation facilities, tailored infrastructure solutions, and more mobility choices, with a focus on celebrating the San Diego River. The Mission Valley Community Plan designates the site as Riverwalk Specific Plan, with land uses of Residential (High Density) in the northeastern and northwestern portions of the site; Office and Visitor Commercial in the northcentral, northeastern, and southeastern portions of the site; and Potential Park/Open Space in the central portion of the site (Figure 2-7, *Mission Valley Community Plan Planned Land Use Map*). As demonstrated in Section 5.1, *Land Use*, the project is consistent with the Mission Valley Community Plan. The Mission Valley Community Plan included a community-wide rezone intended to implement the community Land Use Plan (see Figure 2-9, *Existing Zoning*). Consistent with the Mission Valley Community Plan, the Specific Plan includes the RM-4-10, CC-3-9, OC-1-1, and OP-1-1 zones, as modified in the Riverwalk Specific Plan.

The cumulative impacts assessment in the Mission Valley CPU Program EIR primarily relied on the cumulative impact determinations in the City's General Plan Program EIR. Consistent with CEQA Guidelines Section 15130(e), where the significance of cumulative impacts was previously identified for the General Plan PEIR, and the CPU is consistent, those impacts do not need to be analyzed further. The Mission Valley CPU Program EIR determine that build-out of the Community Plan would add incremental effects to several of the issues evaluated in the General Plan Program EIR; however, the effects associated with the CPU would also be cumulatively significant. Issue areas identified as cumulatively significant in the Mission Valley CPU Program EIR include: (1) air quality (conflicts with air quality plans and air quality standards); (2) historical, cultural, and tribal cultural resources; (3) hydrology and water quality (flooding and drainage patterns from riverine flooding); (4) noise (increase in ambient noise, land use compatibility, and construction noise); (5) public services and facilities; (6) public utilities and infrastructure; and (7) transportation (traffic circulation – roadway segments, intersections, and freeway facilities).

6.1.2 Morena Corridor Specific Plan

The site for the Morena Corridor Specific Plan is located north of the San Diego River, east of Mission Bay, south of Clairemont Drive, and west of the residential neighborhoods in Linda Vista and Clairemont Mesa. The Morena Corridor Specific Plan area includes the existing Morena/Linda Vista Trolley Station at Morena Boulevard and Linda Vista Road that connects the Morena Corridor Specific Plan area to Mission Valley and further east, and provides a connection to Old Town San Diego. Future trolley stations at the intersection of West Morena Boulevard and Tecolote Road and at the intersection of Morena Boulevard and Clairemont Drive will connect Downtown San Diego in the south to the Veterans Hospital; the University of California, San Diego (UCSD); and Westfield UTC in the north.

The Morena Corridor Specific Plan includes policy direction and supplemental development regulations intended to guide future development in the Morena Corridor Specific Plan area. Also included in the Morena Corridor Specific Plan are changes to the street system intended to improve mobility across all travel modes in the Morena Corridor Specific Plan area. The Morena Corridor

Specific Plan includes land use designations intended to encourage a greater density and intensity of mixed-use residential and commercial land uses for areas near the future Mid-Coast Light Rail Trolley Station at Tecolote Road and the existing Morena/Linda Vista Trolley Station.

A Program EIR was prepared for the Morena Corridor Specific Plan project. The Morena Corridor Specific Plan Program EIR determined that significant cumulative impacts associated with transportation and circulation, air quality (operational), historical and tribal cultural resources, and visual effects and neighborhood character would result from development of the Morena Corridor Specific Plan.

6.2 Cumulative Effects Analysis

The following discussion provides an analysis of the project's potential cumulative effects and identifies those issue areas that have been excluded from discussion of cumulative effects, because those issue areas were adequately addressed in the Mission Valley CPU Program EIR.

6.2.1 Land Use

Land uses and development patterns are typically established in local land use planning documents specific to jurisdictions, but can have implications on surrounding areas. Therefore, the geographic scope for the land use cumulative analysis is generally the Mission Valley Community Plan area. Development on the Specific Plan area is governed by the Mission Valley Community Plan, a component of the City's General Plan, and the Land Development Code. Additionally, the project site is regulated by the San Diego River Park Master Plan, Montgomery Field ALUCP, San Diego International Airport ALUCP, and is within the City's MSCP Subarea. For a detailed discussion and analysis of all these plans, refer to Section 5.1, *Land Use*.

6.2.1.1 Mission Valley Community Plan

The Mission Valley CPU Program EIR concluded that the CPU is consistent with and would also implement the environmental goals and objectives of the Regional Plan. The CPU's land use framework is consistent with the City's MSCP Subarea Plan and the MHPA LUAGs and would accommodate the development proposed in the CPU area's Specific Plans. Development implemented in accordance with the CPU would not result in conflicts with the City's ESL Regulations, as the CPU contains policies that support these regulations. Any development within the CPU area that would encroach into environmentally sensitive lands would be subject to review in accordance with the ESL Regulations (LDC Section 143.0101 et seq.). Future development would also be required to comply with the City's Historical Resources Regulations, which protect designated and eligible historical resources throughout the City. Future development projects within the Airport Influence Areas for San Diego International Airport (SDIA) or Montgomery-Gibbs Executive Airport would be submitted to the San Diego County Regional Airport Authority, acting as the Airport Land Use Commission (ALUC), to ensure the consistency of future development with the Airport Land Use

Compatibility Plan (ALUCP) for the relevant airport, until the ALUC determines that the updated Community Plan and development regulations are consistent with the relevant ALUCPs, or the City Council takes action to overrule the ALUC. Based on the compatibility of the CPU with the General Plan policy framework and other applicable regulations and land use plans, cumulative land use impacts associated with implementation of the Mission Valley Community Plan would be less than significant and have been adequately addressed.

6.2.1.2 Morena Corridor Specific Plan

As presented in the Morena Corridor Specific Plan Program EIR, future development within that Specific Plan area would also be consistent with the City's General Plan, Clairemont Mesa Community Plan, Linda Vista Community Plan, LDC, the San Diego River Park Master Plan, and SANDAG's San Diego Forward: The Regional Plan. That Program EIR determined that cumulative land use impacts associated with build-out of the Morena Corridor Specific Plan and development within the surrounding area would be less than significant. Thus, development of the project in concert with development planned for the Morena Corridor Specific Plan would not combine to result in cumulatively significant land use impacts.

6.2.1.3 Riverwalk Project

As presented in Section 5.1, *Land Use*, of the EIR, the Riverwalk Specific Plan is overall consistent with all applicable goals, policies, and objectives of the General Plan, the Mission Valley Community Plan and the LDC, and SANDAG's San Diego Forward: The Regional Plan. The project would not result in a significant cumulative impact due to inconsistency or conflict with an adopted land use plan, land use designation, or policy. Additionally, the project would not result in conflicts the Montgomery Field ALUCP, the San Diego International Airport ALUCP, and the MSCP. The Riverwalk Specific Plan, when taken into account with other cumulative projects, would not result in a significant land use impact. As the project would not result in a cumulatively considerable contribution to a land use compatibility impact.

The Regional Plan noted that regional reduction targets for GHG emissions would be met and exceeded by *using land in ways that make developments more compact, conserving open space, and investing in a transportation system that provides people with alternatives to driving alone*. The project is consistent with the Regional Plan's policies by constructing a mixture of uses, including 4,300 multi-family residential units for both market rate and low-income residents, 1,152,000 square feet of employment-generating office and retail space, a series of bike paths consistent with the regional bicycle network, and approximately 97 acres parks, trails and open space. The project provides increased housing as a large scale, smart growth neighborhood where residents can live, work, and play in a VMT-efficient manner, located immediately adjacent to both an existing transit stop and a proposed new trolley stop included with the project. Build-out of the Riverwalk Specific Plan, when taken into account with other cumulative projects, would not result in a cumulatively significant land use impact.

6.2.2 Transportation and Circulation

Since the time of adoption of the General Plan, the update of the Mission Valley Community Plan, and the Morena Corridor Specific Plan, evaluation of transportation and circulation environmental effects have changed from a level of service (LOS)-based discussion to one based on vehicle miles traveled (VMT), in accordance with SB 743. A VMT analysis, like that prepared for the project as part of the Transportation Impact Analysis (TIA) and addressed in Section 5.2, *Transportation and Circulation*, is by nature a cumulative issue. The state of California Office of Planning and Research (OPR) determined that: *A project that falls below an efficiency-based threshold that is aligned with long-term environmental goals and relevant plans would have no cumulative impact distinct from the project impact. Accordingly, a finding of a less-than-significant project impact would imply a less than significant cumulative impact, and vice versa.*

Due to the fact that VMT analysis measures the VMT efficiency of a project compared to the average VMT efficiency of the region covered by SANDAG, the geographic scope for the transportation cumulative analysis is the San Diego Region. A Mobility Assessment, separate from the CEQA analysis, analyzes a project's consistency with the applicable Community Plan and determines transportation improvements to be provided as the project builds out. The geographic scope of the Mobility Assessment is the Mission Valley Community Plan area.

6.2.2.1 Mission Valley Community Plan

The Community Plan allows for increased density in transit priority areas and a complementary mix of land uses that puts origins and destinations closer together and links them with a more complete active-transportation network, thus reducing the distances travelled and the need to travel by car. Nonetheless, as concluded in the Mission Valley CPU Program EIR, build-out of the Community Plan would result in cumulatively significant impacts to roadway segments, intersections, freeway segments, and freeway ramp meters under the CPU.

6.2.2.2 Morena Corridor Specific Plan

The transportation analysis conducted for the Morena Corridor Specific Plan Program EIR concluded that, like the Mission Valley CPU Program EIR, cumulative impacts to roadway segments, intersections, freeway segments and freeway on-ramps would be significant. Relative to conflicts with potential future cumulative alternative transportation projects proposed outside of the Morena Corridor Specific Plan area, the Morena Corridor Specific Plan Program EIR concluded that cumulative impacts related to alternative transportation would be less than significant. Under VMT thresholds, the Morena Corridor Specific Plan area is presumed to have a less than significant impact on transportation because it is within a TPA. CEQA Guidelines section 15064.3(b)(1) provides that projects within a TPA (0.5 mile of an existing major transit stop or an existing high-quality transit corridor) should be presumed to cause a less than significant traffic impact. The Morena Corridor Specific Plan area contains the existing Morena/Linda Vista trolley station and is within 0.5 mile of

two major transit stops that are under construction. Thus, development of the project in concert with development planned for the Morena Corridor Specific Plan would not combine to result in cumulatively significant transportation impacts using a VMT efficiency metric.

6.2.2.3 Riverwalk Project

The project would be consistent with the Mobility Element of the General Plan and other adopted policies, plans (including the Mission Valley Community Plan), and programs supporting the transportation system, including pedestrian, bicycle, and transit facilities. The project design includes improvements that would enhance existing bicycle and pedestrian transportation modes on and around the site and facilitate access to and use of public transit. As a result, the project would be consistent with the City's alternative transportation policies. As no policy conflicts have been identified, cumulative impacts related to transportation policy would be less than significant.

The project site is located within a TPA. Development proposed by the project would include an on-site trolley station and be within 0.5-mile of an existing major transit stop at Fashion Valley Transit Center and high-quality transit corridor. In addition, the project's resident VMT per capita and the project's employee VMT per employee is calculated to be lower than 85 percent of the respective Regional VMT averages. Moreover, the construction of the on-site trolley station creates a new 0.5-mile TPA radius around this new transit stop, thus existing development that is beyond the existing 0.5-mile radius would gain access to the new major transit stop. Therefore, cumulative VMT impacts associated with the project would not be significant.

Cumulative impacts associated with increased hazards due to design features and emergency access would be less than significant as the proposed project would support transportation infrastructure and amenities intended to increase multi-modal accessibility that would not conflict with emergency access. Because the project does not propose non-standard design features and is not expected to increase traffic hazards to motor vehicles, bicyclists, or pedestrians, impacts related to the increase of traffic hazards as a result of the project would be less than significant. Project improvements would contribute to improved emergency access during flood events. The project would be designed in accordance with applicable safety standards. The project would not result in inadequate emergency access. Impacts would be less than significant. The project would not result in a cumulatively considerable impact; therefore, cumulative impacts would be less than significant.

6.2.3 Visual Effects and Neighborhood Character

The geographic scope for the visual effects and neighborhood character cumulative analysis is the Mission Valley Community Plan area, with a focus on western Mission Valley, and the San Diego River, as it is a predominant feature of the visual environment related to the project. The southern portion of the Linda Vista Community Plan area is also a part of the geographic scope for this issue area, as the portion of the Linda Vista community north of Friars Road forms a part of the neighborhood character for the project.

6.2.3.1 Mission Valley Community Plan

In its analysis of visual quality and neighborhood character, the Mission Valley CPU Program EIR concludes that the CPU would not result in a cumulatively significant impact relative to visual quality and neighborhood character, because the Community Plan area is already urbanized and includes existing development of the type that would be further developed under the CPU. The CPU includes policies that limit development and building heights, that create open public view corridors, and that ensure that any new development is consistent with the existing character and protects public views. The policies address consistency in setbacks, height and bulk, landscaping, design, historic character, and natural features such as canyons and hillsides. Compliance with the Land LDC) would ensure that cumulative light and glare impacts are avoided.

6.2.3.2 Morena Corridor Specific Plan

The Morena Corridor Specific Plan Program EIR determined that future growth within that Specific Plan area in combination with development within surrounding community planning areas has the potential to cumulatively impact the visual environment, scenic views, and neighborhood character. However, Riverwalk's impacts on visual effects neighborhood character are limited to the immediate project area and would not have a visual or neighborhood character effect outside the western Mission Valley area. Thus, as concluded above, the project would not result in a cumulatively significant impact associated with visual effects and neighborhood character. Thus, development of the project in concert with development planned for the Morena Corridor Specific Plan would not combine to result in cumulatively significant visual impacts and have been adequately addressed.

6.2.3.3 Riverwalk Project

As discussed in Section 5.3, *Visual Effects and Neighborhood Character*, the Riverwalk Specific Plan would redevelop the project site,. Based on the existing urbanized character of the CPU area, implementation of regulations and policies contained in the CPU, compliance with the Riverwalk Specific Plan and the LDC, as modified by the Specific Plan's Tailored Development Standards, would ensure that cumulative impacts would be less than significant. Implementation of the project and build-out of the Mission Valley community would continue to contribute to the sense of an urban community for this area of the City. Future development would be required to be visually compatible with the surrounding neighborhood character and utilize appropriate architecture, materials, and development patterns as necessary for consistency with the design guidelines of the Mission Valley Community Plan. Cumulatively significant impacts to visual quality and neighborhood character would not occur. Furthermore, pursuant to the Public Resources Code Section 21099 (d)(1), the project's aesthetic impact shall not be considered significant if the project is residential, mixed-use residential, or an employment center that is located on an infill site within a transit priority area.

6.2.4 Biological Resources

For the purposes of analysis, the geographic scope for the discussion of cumulative effects with regard to biological resources is the City of San Diego. Analysis is based on the MSCP, which covers sensitive biological resources located within the City of San Diego, as well as the requirements in the City's Biology Guidelines that call for "no net loss" of wetland functions and values.

6.2.4.1 Mission Valley Community Plan

As presented in the Mission Valley CPU Program EIR, biological resources that occur within the Mission Valley community and other areas of the City are protected through open space designations and/or their location within the City's MHPA, MSCP Subarea Plan's Management Policies to protect the area's sensitive plants and animals, regulations in the City's Biology Guidelines, and the ESL Regulations. Development that would occur within the CPU area and in the surrounding communities would result in less than significant cumulative impacts to biological resources due to the developed nature of these communities combined with the existing regulatory framework that would ensure that impacts to sensitive biological resources are avoided. Although individual future projects could contribute to incremental biological resource impacts, compliance with applicable CPIOZ regulations, CPU policies, and the City's MSCP Subarea Plan, ESL Regulations, and Biology Guidelines would ensure that cumulative impacts from future development would be less than significant and have been adequately addressed.

6.2.4.2 Morena Corridor Specific Plan

Effects on biological resources associated with the Morena Corridor Specific Plan Program EIR were found not to be significant, because that Specific Plan area is in a wholly urbanized area of San Diego, is not known to contain sensitive species, and does not contain any Multi-Habitat Planning Area (MHPA) preserve lands. Thus, cumulative impacts to biological resources were not addressed in that Program EIR. Thus, development of the project in concert with development planned for the Morena Corridor Specific Plan would not combine to result in cumulatively significant biological impacts.

6.2.4.3 Riverwalk Project

As discussed in Section 5.4, *Biological Resources*, the project would result in significant direct impacts related to vegetation communities and jurisdictional waters, and an indirect impact to sensitive wildlife species. With implementation of mitigation measures included in Section 5.4, *Biological Resources*, and implementation of applicable mitigation for other projects, construction of the project and other development projects would not result in the net loss of jurisdictional resources. Accordingly, the project would not result in a cumulatively considerable impact with regard to biological resources. Additionally, project consistency with the MSCP would ensure that cumulative impacts to vegetation, sensitive species, jurisdictional resources, or wildlife movement would not

occur as a result of the project. Other projects that could have impact on sensitive wetland would be required to similarly evaluate impacts on biological resources and mitigate impacts, as applicable, ensuring no net loss of wetland habitat. As such, cumulatively significant impacts to biological resources would not occur.

6.2.5 Air Quality

In general, the San Diego Air Basin (SDAB) is used as the geographic scope for evaluating cumulative air quality impacts. It is appropriate to consider the entire air basin as air emissions can travel substantial distances and are not confined by jurisdictional boundaries; rather, they are influenced by large-scale climatic and topographical features. While some air quality emissions can be localized, such as a CO hotspots or odor, the overall consideration of cumulative air quality is typically more regional. By its very nature, air pollution is largely a cumulative impact.

6.2.5.1 Mission Valley Community Plan

Construction Emissions

The Mission Valley CPU Program EIR determined that the exact number, timing and size of individual development projects that could occur per the CPU were not knowable at the time the CPU's Program EIR was certified. The CPU Program EIR acknowledged that, while construction emissions related to the development of a small scale project might not exceed the City's significance thresholds for construction, the simultaneous construction of several of these types of projects could result in a significant air quality impact. Similarly, construction activities associated with a large project such as redevelopment of the stadium site could result in a significant air quality impact. While Federal, State and local regulation on air quality provided a framework for development project-level air quality protection measures, it is possible they may not be adequate and require an analysis of the feasibility of avoiding the impact through additional measures. Moreover, given the potential growth that could occur in the CPU area, criteria pollutant air emissions from development per the CPU could exceed the SDAPCD screening threshold. Therefore, even with a proposed mitigation measure applicable to the stadium site, the Mission Valley CPU Program EIR concluded construction emissions would remain significant and unavoidable.

Operational Air Emissions

The Mission Valley CPU Program EIR concluded that cumulative operational emissions associated with buildout of the CPU would be significant. As stated in the CPU Program EIR, because operational emissions associated with buildout of the CPU would be greater for all pollutants when compared to adopted land uses and the assumptions used to develop the RAQS, the CPU buildout would conflict with implementation of air quality plans and could have a potentially significant impact on regional air quality. The RAQS include anticipated growth associated with the pre-2019 Mission Valley Community Plan. Build-out under the Mission Valley CPU would increase the number of multi-family residential units and the amount of commercial, retail, office, institutional, and recreational uses in the CPU area, which would result in greater future emissions compared to the

pre-2019 Mission Valley Community Plan. The Mission Valley CPU Program EIR requires Mitigation Measure AQ-1 that would reduce the potentially significant cumulative air quality impact by requiring the City to provide a revised land use map to the SANDAG to ensure that any revisions made by the SDAPCD to the RAQS and the SIP accurately reflect the anticipated growth of the CPU. However, Mitigation Measure AQ-1 is only partial mitigation, because the City does not have control over updates to the RAQS and SIP; that is the responsibility of SDAPCD. Therefore, the City cannot guarantee Mitigation Measure AQ-1 will be effective. Cumulative air quality impacts associated with build-out of the CPU remained significant and unavoidable, despite the City's adoption of Mitigation Measure AQ-1.

6.2.5.2 Morena Corridor Specific Plan

Like the Mission Valley CPU Program EIR, the Morena Corridor Specific Plan Program EIR determined that future emissions associated with build-out of the Morena Corridor Specific Plan would be greater than future emissions associated with build-out of adopted land uses for that Specific Plan area. Thus, the Morena Corridor Specific Plan would conflict with implementation of the RAQS and would have a potentially significant cumulative impact on regional air quality. Development of the project in concert with development planned for the Morena Corridor Specific Plan would not combine to result in cumulatively significant air quality impacts for the same reason as concluded in the Mission Valley CPU Program EIR – that the City lacks authority to require SDAPCD to update the RAQS and SIP to include updated plans for development, including build-out of the Morena Corridor Specific Plan and the Mission Valley Community Plan.

6.2.5.3 Riverwalk Project

Construction Emissions

The project and the other development projects in the SDAB would contribute particulates and the ozone precursors VOC and NO_x to the area during the same (short-term) period of construction. As described in Section 5.5, *Air Quality*, project emissions during construction would not violate any air quality standard or contribute substantially to an existing or projected air quality violation. Construction emissions from the project would be less than the significance thresholds (as shown in Table 5.5-5). However, consistent with the Mission Valley CPU Program EIR analysis, the exact number, timing and size of individual development projects that could occur per the CPU is not knowable at the time this EIR is considered for certification. While construction emissions related to the development of the project may be insignificant, if they are combined at the same time with enough other projects, the project might exceed the City's significance thresholds for construction. It is not feasible for the City to establish an air basin wide system to coordinate the timing of construction of each development project in the basin in order to prevent the overlapping of construction schedules from projects. The air basin is larger than the City's land use jurisdiction and the City would have no control over the timing and amount of construction permits issued by other agencies in the basin (e.g. the Port of San Diego, County of San Diego, and each City within the air basin).

Operational Air Emissions

For the project, operational air quality impacts were found to be significant, as presented in Section 5.5, *Air Quality*. The cumulative total of project buildout emissions would cause an exceedance of the daily ROG, CO and PM₁₀ tons/year threshold. Based on the size and scope of the project, there are no feasible mitigation measures that can be implemented to reduce operational emissions that exceed SDAPCD standards to below the standards and still meet the project objectives. The project has been included in the build-out scenario evaluated in the CPU Program EIR. As evaluated in the Mission Valley CPU Program EIR, cumulative air quality impacts due to operational emissions would be significant and unmitigable because the City lacks control over SDAPCD's timeline to update the RAQS and SIP. Due to the fact that both the Mission Valley CPU Program EIR and the EIR conclude there are significant cumulative impacts to air quality, an alternative to avoid such impacts is analyzed in the EIR.

6.2.6 Historical Resources

For historical resources, the geographic scope is the Mission Valley Community Plan area, given its importance for both archaeological and historic resources, as well as the greater San Diego region based on the cultural richness and significance of cultural resources in this area. Cumulative impacts to historical resources are expected to be limited by the fact that the project, as well as cumulative projects, will be required to comply with City and County mitigation measures (i.e., archaeology and historical resources monitoring and data recovery programs) applied to projects which could impact significant historical resources. These mitigation measures require information associated with these sites to be recorded before impacts may occur.

6.2.6.1 Mission Valley Community Plan

The Mission Valley CPU Program EIR determined individual future projects may contribute to incremental historical and cultural impacts. Even with the implementation of the City's Historic Resource Regulations to mitigate project impacts to such resources, the CPU Program EIR concluded there was no guarantee of ensuring the successful preservation of all historic or cultural resources, because it was possible that the area of a future project within a designated low sensitivity area could still contain a historic or cultural. Therefore, at the program level of analysis conducted for the CPU Program EIR, the City concluded that the cumulative impact on historical and cultural would be considered significant and unmitigated.

6.2.6.2 Morena Corridor Specific Plan

The Morena Corridor Specific Plan Program EIR addressed both historical and tribal cultural resources in one section of that Program EIR. Like the Mission Valley CPU Program EIR, the Morena Corridor Specific Program EIR concluded that implementation of that Specific Plan would result in cumulatively significant impacts to historical resources, prehistoric resources, and sacred sites. While Federal, State, and local regulations, as well as goals and policies developed by the City would

reduce impacts, the potential for additional development and mobility improvements within the Morena Corridor Specific Plan area could result in significant impacts to historical resources. Potential impacts resulting from implementation of the Morena Corridor Specific Plan in conjunction with impacts resulting from other development within the area could contribute to a cumulatively considerable impact to historical resources. As stated above, the project would mitigate its contribution to the potential for cumulative impacts; thus, it would not add to the cumulative impact generated by implementation of the Morena Specific Plan.

6.2.6.3 Riverwalk Project

As stated in Section 5.6, *Historical Resources*, the project could result in direct impacts to subsurface archaeological resources as a result of ground-disturbing activities associated with development allowed under the Riverwalk Specific Plan. Implementation of mitigation measures presented in Section 5.6, which require monitoring of grading activities, would reduce potential impacts to unknown subsurface archeological resources remains to below a level of significance. For the project, mitigation measures would be required for all ground disturbing activities. Therefore, the reason why the CPU Program EIR concluded impacts would remain significant and unmitigated are not applicable to the Riverwalk Project, as specific measures have been developed that would reduce impacts to below a level of significance.

6.2.7 Energy

The geographic scope for consideration of cumulative energy impacts is the San Diego region as a whole. Development throughout the region influences the demand for energy supply and can drive the location and need for new or additional energy production and transmission infrastructure. Energy service providers and their distribution systems generally cover large areas and are not necessarily associated with or restricted to specific governmental jurisdictions. Most development or redevelopment projects, such as those included in the cumulative project list, do not independently create substantial impacts on energy production or infrastructure. Rather, the demand for energy is influenced by regionwide development. Thus, many planning documents that forecast energy demand and determine adequate supply and appropriate infrastructure needs and strategies are also on regional scales.

6.2.7.1 Mission Valley Community Plan

The Mission Valley CPU Program EIR concluded that future development within the Community Plan area and planned growth in the City would require additional energy demand. However, as new development and redevelopment occurs, buildings would be required to comply with the California Energy Code, Title 24 requirements in place at the time of building permit issuance. Each update to the Energy Code has historically incorporated more stringent energy efficiency requirements, and the state is headed towards a net-zero energy goal for new development. Thus, as redevelopment occurs, older, less energy efficient buildings will be replaced with more energy efficient buildings

that meet current energy efficiency standards. Furthermore, the City's CAP includes additional energy efficiency requirements that would be required of future discretionary developments, and all development is required to comply with Title 24 requirements. Policies within the Community Plan are supportive of the General Plan City of Villages strategy, which intends to focus development intensity near transit and supports development of increased multi-modal transportation options. Other planning efforts in the City would similarly be required to be consistent with the City's overall framework for growth, which includes reducing VMT and supporting sustainable energy-efficient development. Therefore, cumulative impacts related to energy consumption were determined to be less than significant and have been adequately addressed.

6.2.7.2 Morena Corridor Specific Plan

Similar to the Mission Valley CPU Program EIR, the Morena Corridor Specific Plan Program EIR determined that build-out of that Specific Plan area would not result in cumulatively significant impacts related to energy consumption. As stated above, with compliance with Federal, State, and local energy conservation and/or alternative energy policies, such as Title 24 requirements in place at the time of building permit issuance, minimizes the potential for unnecessary or wasteful energy use associated with cumulative development or the demand for energy beyond that accounted for in regional supply forecasts and production.

6.2.7.3 Riverwalk Project

The project would not result in a substantial increase in energy consumption and would not be greater than what is already planned for the project through the Mission Valley Community Plan; and no adverse effects on non-renewable resources are anticipated. The project would follow UBC and Title 24 requirements for energy efficiency in effect at the time of construction that would reduce the project's overall demand for energy. The project's design features and consistency with the City's General Plan conservation strategies are intended to ensure that the project's energy consumption would not be wasteful, inefficient, and unnecessary. While other development projects would result in the demand for additional energy, they also would be subject to Federal, State, and local energy conservation and/or alternative energy policies, such as Title 24 requirements in place at the time of building permit issuance. Each update to the Energy Code has historically incorporated more stringent energy efficiency requirements, and the state is headed towards a net-zero energy goal for new development. Thus, as development occurs, more energy efficient buildings would come on-line that meet current energy efficiency standards. This minimizes the potential for unnecessary or wasteful energy use associated with cumulative development or the demand for energy beyond that accounted for in regional supply forecasts and production. Therefore, the project would not result in a cumulatively considerable contribution on energy demand.

6.2.8 Noise

Generally, noise impacts are limited to the area directly surrounding the noise generator, as noise attenuates with distance and only has the potential to combine with other noise sources in the immediate vicinity. Therefore, the geographic scope for cumulative impacts relative to noise areas immediately surrounding the project site and Mission Valley Community Plan area roadways that would be used by project vehicles.

6.2.8.1 Mission Valley Community Plan

Construction

The Mission Valley CPU Program EIR concludes that build-out of the CPU could result in the exposure of sensitive receptors to significant temporary construction noise due to the highly developed nature of the CPU area with sensitive receptors potentially located proximate to construction sites. At the program level of analysis conducted for the CPU EIR, it was unknowable if all future development projects would be, in fact, consistent with the noise ordinance. Therefore, noise levels associated with grading activities adjacent to the San Diego River corridor, could result in temporary impacts to sensitive bird species during construction would be considered significant and unmitigated.

Operational

The Mission Valley CPU Program EIR concludes that, while some projects may adequately attenuate exterior noise, there would still be new noise sensitive land uses located in three areas that would experience a significant increase in ambient noise levels exceeding the applicable Land Use Noise Compatibility Guidelines due to increase traffic related noise. The three areas are existing noise-sensitive receptors adjacent to the following roadway segments:

1. Phyllis Place from Abbots Hill Road to I-805 Southbound Ramps;
2. Bachman Place from Hotel Circle to Lewis Street; and
3. Rancho Mission Road from San Diego Mission Road to Camino Del Rio North.

Therefore, cumulative impacts associated with ambient noise increases and land use compatibility were determined to be significant and unavoidable in those three areas of the CPU.

The Mission Valley CPU Program EIR also concluded that some projects could locate land uses near certain freeway segments, potentially exposing them to noise levels exceeding 75 dBA CNEL, including land uses located within approximately 163 feet to 320 feet of I-8. The CPU Program EIR found that new development located in areas where the exterior noise levels exceed the Land Use Noise Compatibility Guidelines of the General Plan Noise Element would be required to conduct a site-specific interior noise analysis and submit a Title 24 Compliance Report that demonstrate interior noise levels would meet City standards. The CPU also contains policy NOI-1 which supports site design and noise reduction measures for new development located within 500 feet of a freeway.

The Mission Valley CPU Program EIR concludes that implementation of this regulatory and policy framework would ensure that interior noise impacts due to freeway traffic volumes for new development would be less than significant. However, because some projects might locate land uses where future exterior noise levels would exceed the City Noise Compatibility Guidelines, the impact at the programmatic level would remain cumulatively significant and unmitigated for exterior noise.

6.2.8.2 Morena Corridor Specific Plan

The Morena Corridor Specific Plan Program EIR concluded that noise impacts associated with build-out of communities neighboring that Specific Plan area would be localized in nature and would not affect residences in the Specific Plan area except for development that may occur at the boundary of the neighboring areas. The road segments for the Riverwalk Specific Plan are not identified as among the localized areas the Morena Corridor Specific Plan would create a significant impact in operational noise. Noise impacts due to build-out of the Morena Corridor Specific Plan in concert with the project would not be cumulatively significant.

6.2.8.3 Riverwalk Project

Construction

The mitigation measures included in Section 5.8, *Noise*, would mitigate the project's indirect noise impact for wildlife species. Noise levels from project construction to off-site or occupied (future) on-site residences would not exceed the limits defined in the City Noise Ordinance. The project would be consistent with the City's Noise Ordinance, as the Mission Valley Community Plan anticipated some projects might do. Therefore, the project would avoid the potential for cumulative impacts associated with construction noise and the reasons why the Mission Valley CPU Program EIR concluded the noise impacts are significant and unmitigated from the buildout of the community plan are not applicable to the project. Furthermore, given the rapid attenuation of noise with distance, it would be too speculative to conclude that construction noise generated by the project would combine with the construction of other projects in the vicinity to generate a significant impact above the City's construction noise standards. Project construction noise and vibration impacts would therefore not be cumulatively considerable.

Operational

As evaluated in Section 5.8, *Noise*, the project would not result in significant impacts associated with operational noise. Moreover, the project is not locating land uses within areas where the future exterior noise level would remain cumulatively significant for exterior noise or within the three road segment areas that the Mission Valley CPU Program EIR found would have a significant increase in ambient noise levels exceeding the applicable Land Use Noise Compatibility Guidelines. Therefore, the reasons why the buildout of the Mission Valley Community Plan concluded the noise impacts are significant and unavoidable are not applicable to the project and the project would not have a cumulatively considerable impact on noise.

6.2.9 Greenhouse Gas Emissions

The geographic scope of consideration for GHG emissions is global, and as such emissions contribute, on a cumulative basis, to global climate change. By nature, GHG impacts are cumulative as they are the result of combined worldwide emissions over many years, and additional development would incrementally contribute to this cumulative impact. The discussion presented in Section 5.9, *Greenhouse Gas Emissions*, also serves as the project's cumulative impact analysis.

6.2.9.1 Mission Valley Community Plan

As concluded in the Mission Valley CPU Program EIR, the analysis of GHG emissions a cumulative analysis by nature, because GHG emissions are caused by global GHG emissions, not individual projects. The CPU Program EIR concludes that implementation of the Mission Valley Community Plan would not result in a cumulatively considerable contribution to GHG emission impacts and have been adequately addressed.

6.2.9.2 Morena Corridor Specific Plan

Like the Mission Valley CPU Program EIR, the Morena Corridor Specific Plan's contribution to the cumulative impact from GHG emissions were determined to be less than cumulatively considerable in the Morena Corridor Specific Plan Program EIR. Cumulative impacts related to conflicts with GHG plans and policies were determined less than significant. As concluded in the Morena Corridor Specific Plan Program EIR, cumulatively considerable contribution to GHG emission impacts would not result from implementation of that project.

6.2.9.3 Riverwalk Project

As discussed in Section 5.1, *Land Use*, and demonstrated in Section 5.9, *Greenhouse Gas Emissions*, the Riverwalk Specific Plan completed a CAP Conformance Evaluation, which determined that the Specific Plan would be consistent with the CAP. A CAP Consistency Analysis was performed for development that would be allowed under the Specific Plan, which determined that future development would be consistent with the CAP. Based on the project's consistency with the CAP Consistency Checklist strategies, the project's contribution of GHG emissions to cumulative Statewide emissions would be less than cumulatively considerable. Overall, both the Specific Plan and future projects associated with buildout of the Specific Plan would be consistent with the CAP.

6.2.10 Tribal Cultural Resources

The geographic scope of consideration for the cumulative analysis of tribal cultural resources includes the Mission Valley area. The Mission Valley area presents a unique prehistoric context within the region as it was settled in a fairly independent manner from the surrounding area due to

the valley's relative abundance of resources available within an arid environment during prehistoric times.

6.2.10.1 Mission Valley Community Plan

The Mission Valley CPU Program EIR determined individual future projects may contribute to incremental historical, cultural and tribal cultural resource impacts. Even with the implementation of the City's Historic Resource Regulations to mitigate project impacts to such resources, the CPU Program EIR concluded that there was no guarantee for ensuring the successful preservation of all tribal cultural resource, because it was possible that area of a future project within a designated low sensitivity area could still contain a tribal cultural resource. Therefore, at the program level of analysis conducted for the CPU Program EIR, the City concluded that the cumulative impact on and tribal cultural resources would be considered significant and unmitigated.

6.2.10.2 Morena Corridor Specific Plan

The Morena Corridor Specific Plan Program EIR addressed both historical and tribal cultural resources in one section of that Program EIR. See discussion under Section 6.4.2.6 for a discussion of that project's cumulative effects on tribal cultural resources. Like the Mission Valley CPU Program EIR, the Morena Corridor Specific Program EIR concluded that implementation of that Specific Plan would result in cumulatively significant impacts tribal cultural resources. While Federal, State, and local regulations, as well as goals and policies developed by the City, would reduce impacts, the potential for additional development and mobility improvements within the Morena Corridor Specific Plan area could result in significant impacts to tribal cultural resources. Potential impacts resulting from implementation of the Morena Corridor Specific Plan in conjunction with impacts resulting from other development within the area could contribute to a cumulatively considerable impact to tribal cultural resources. As stated above, the project would mitigate its contribution to the potential for cumulative impacts; thus, it does not add to the cumulative impact generated by implementation of the Morena Specific Plan.

6.2.10.3 Riverwalk Project

As stated in Section 5.10, *Tribal Cultural Resources*, Tribal outreach efforts have been conducted, resulting in specific measures added to the Riverwalk Specific Plan to reflect the project site's prominent location within the prehistory of San Diego. The plant palette for landscaping within the Riverwalk River Park incorporates species traditionally utilized by the Kumeyaay people that historically inhabited the area. Additionally, interpretive signage would be provided that includes identification signs along the San Diego River Pathway with plants traditionally utilized by the Kumeyaay people identified by a symbol. An associated storyboard sign would describe the native plants identified along the San Diego River Pathway and their relationship to the Kumeyaay people's ability to thrive in the region. The Riverwalk Specific Plan include streets identified with traditional Kumeyaay names. Thus, with incorporation of design features in the Riverwalk Specific Plan that

specifically address the cultural history of the area and implementation of mitigation included in Section 5.10, *Tribal Cultural Resources*, potential impacts to tribal cultural resources would not be significant.

Moreover, as stated in Section 5.10, *Tribal Cultural Resources*, the project could result in direct impacts to subsurface archaeological resources because of ground-disturbing activities associated with development allowed under the Riverwalk Specific Plan. It was concluded that with implementation of the mitigation measures presented in Section 5.6, which apply to all project areas where ground disturbance would occur, would reduce potential impacts to tribal cultural resources to below a level of significance. Therefore, the reason why the CPU Program EIR concluded impacts would remain significant and unmitigated is not applicable to the Riverwalk project. The project is distinguishable and would not result in cumulatively significant impacts associated with historical, cultural and tribal cultural resources.

6.2.11 Geologic Conditions

Potential geologic or soil hazards resulting from development are generally localized to the site and immediate surrounding lands rather than a broad-reaching area. Therefore, the geographic scope for discussion of cumulative impacts related to geologic conditions is the Mission Valley Community Plan area and immediately surrounding lands.

6.2.11.1 Mission Valley Community Plan

The Mission Valley CPU Program EIR determined that development within the Mission Valley community in combination with surrounding Community Planning Areas would not compound or worsen potential geologic hazards. Geologic hazard conditions are site-specific and do not compound or increase in combination with projected development elsewhere in the county. Thus, as each individual development would be required to comply with remedial measures identified in a site-specific geotechnical investigation, as required by the SDMC and CBC, cumulative impacts related to geologic hazards would be less than significant and have been adequately addressed.

6.2.11.2 Morena Corridor Specific Plan

The Morena Corridor Specific Plan Program EIR concluded that cumulative impacts related to geologic hazards within the Morena Corridor Specific Plan area and surrounding community plans would be less than significant with implementation of recommendations included in site-specific geotechnical investigations required under the CBC and SDMC. Development of that Specific Plan area in combination with surrounding development in the larger community planning areas would not compound or worsen potential geologic hazards. Like the project, each individual development would be required to comply with remedial measures identified in a site-specific geotechnical investigation, as required by the SDMC and CBC. Thus, development of the project in concert with

development planned for the Morena Corridor Specific Plan would not combine to result in cumulatively significant geologic hazard.

6.2.11.3 Riverwalk Project

Development of the project would require implementation of proper engineering design, utilization of standard construction practices, as well as adherence to CBC and SDMC, which would reduce impacts to an acceptable level of risk; therefore, impacts would be less than significant.

Thus, the potential for adverse geologic or soil hazards would be reduced or minimized through compliance with regulatory requirement thereby avoiding any cumulatively significant geologic impacts.

6.2.12 Hydrology

The geographic scope for hydrology is the San Diego Hydrologic Unit (No. 907.00), Lower San Diego Hydrologic Area (No. 907.10), and Mission San Diego Hydrologic Subarea (HSA) (907.11) per the Water Quality Control Plan for the San Diego Basin. Lands and water bodies within the watershed are part of an interrelated hydrologic system, such that modifications to a portion of a watershed or water pollution produced by development in one location may result in hydrology and water quality impacts that affect other water bodies in the watershed.

6.2.12.1 Mission Valley Community Plan

The Mission Valley CPU Program EIR determined that future projects within the Mission Valley Community Plan area and surrounding Community Planning Areas could have a cumulative impact on hydrology, including downstream problems associated with flooding, sizing of drainage facilities, erosion, and sedimentation. However, all future development within the City and surrounding Community Plan areas would be required to comply with all NPDES permit requirements, including the development of a SWPPP if the disturbed area covers one acre or more, or a Water Quality Control Plan if the disturbed area is less than one acre. Future projects would also be required to follow the City's Storm Water Standards Manual for drainage design, and BMPs for treatment. Improvements along the San Diego River would occur in the future as development projects are implemented. All developments and improvements would be required to comply with City and FEMA standards, as well as General Plan goals and policies and Community Plan policies, to ensure protection of hydrology and avoidance of flood hazards. Development would be required to adhere to the aforementioned standards to ensure runoff and flooding impacts are minimized. Thus, buildout of the Community Plan area would not result in a considerable contribution to cumulative impacts associated with hydrology except for two areas that would have significant and unavoidable impact from flooding.

As explained in the Mission Valley CPU Program EIR findings, future development located behind provisionally accredited levees (PALs) could be impacted by riverine flooding given the level of

uncertainty regarding the levees status in the next revision of FEMA's Flood Insurance Rate Maps (FIRMs). The following areas could potentially be impacted:

- (a) North of the San Diego River from SR-163 to just west of the westerly terminus of Station Village lane, including properties along Hazard Center Drive, portions of Frazee Road south of Friars Road, Mission Center Court, Caminito Gabaldon, and Caminito De Pizza.
- (b) South of the San Diego River from SR-163 to Qualcomm Way, including properties along Camino De La Reina, Camino Del Rio North, and Camino Del Este. This includes Mission Valley Mall.

Policy FSR-3 of the CPU recommends that development located behind a PAL be designed to SFHA Zone AE criteria by projecting the Base Flood Elevation(s) shown in the adjacent Zone AE into the project area. The CPU provides a policy framework that would help reduce potential flooding impacts related to future development behind a PAL. Designing to the Zone AE criteria as specified above would provide protection up to the 100-year flood event. However, given that it is unknown at this time whether the PAL would be removed from the next FIRM revision, impacts and mitigation are not fully known. Therefore, the Mission Valley CPU Program EIR concluded the impact would remain significant and unavoidable from flooding risk in these two subareas of the CPU.

6.2.12.2 Morena Corridor Specific Plan

The Morena Corridor Specific Plan Program EIR addresses cumulative impacts associated with hydrology and water quality in one section of that Program EIR and determined that future projects within the Morena Corridor Specific Plan area could contribute to cumulative impacts related to hydrology and water quality, including downstream flooding, water quality impacts, erosion, and sedimentation. However, like the project, all future development within the Morena Corridor Specific Plan area would be required to comply with all NPDES permit requirements, including the development of a SWPPP if the disturbed area covers one acre or more or a water quality control plan if the disturbed Standards Manual for drainage design and BMPs for treatment. Thus, the Morena Corridor Specific Plan Program EIR concluded that cumulative impacts would be less than significant. Thus, development of the project in concert with development planned for the Morena Corridor Specific Plan would not combine to result in cumulatively significant Hydrology or Water Quality Impact.

6.2.12.3 Riverwalk Project

As described in Section 5.12, *Hydrology*, implementation of the project requires conformance with a number of regulatory requirements related to hydrology, including applicable elements of the CWA, NPDES, City storm water standards, Porter-Cologne Water Quality Control Act, FEMA floodplain standards, and RWQCB Basin Plan. The regulatory requirements described in Section 5.12 constitute a regional effort to implement hydrology and water quality protections through a watershed-based

program designed to meet applicable criteria. These standards require the implementation of efforts to reduce runoff, with the NPDES Municipal Permit identifying the specific goals of limiting or prohibiting storm water and non-storm water discharges, and promoting attainment of water quality objectives necessary to support designated beneficial uses. The City has implemented requirements to meet these goals (and other applicable regulatory criteria) in the form of the associated storm water standards outlined in Section 5.12, as well as related education, planning, and enforcement procedures. Based on the described regional/watershed-based approach required for hydrology in existing regulatory standards, as well as the fact that conformance with these requirements would be required for all identified projects within the cumulative projects area (including the project), cumulative hydrology/water quality impacts would be less than significant. Moreover, the project is not located in the two areas behind the PALs that the Mission Valley CPU Program EIR identified as having a significant and unmitigated impact from the risk of flooding. Therefore, the reason why the CPU Program EIR concluded impacts would remain significant and unmitigated is not applicable to the Riverwalk project and the project does not have a cumulatively considerable impact on hydrology.

6.2.13 Public Utilities

Public utilities involve services that serve the San Diego region. More importantly for the project are those public utilities and providers within the City of San Diego. Thus, the geographic scope for the public utilities cumulative analysis is the City.

6.2.13.1 Mission Valley Community Plan

The Mission Valley CPU Program EIR found that, due to projected population growth in the CPU area, an increase in demand for public utilities could potentially result in the need for new or physically altered public utilities, construction of which could cause significant environmental impacts. However, no new storm water drains, drainage facilities, sewer collection or wastewater treatment facilities, water distribution or treatment facilities, or communications systems infrastructure were proposed. The CPU Program EIR merely acknowledged that the need could arise sometime during the course of the CPU build-out. Given that no construction details or their associated impacts were known at the time, the CPU Program EIR concluded it would be too speculative at the program level of analysis to identify significant impacts or mitigation measures for the potential impacts. Rather than terminate the analysis, the CPU Program EIR concluded the impact to be cumulatively significant and unmitigated.

6.2.13.2 Morena Corridor Specific Plan

The Morena Corridor Specific Plan would rely on public utilities similar to those that would serve the project. The Morena Corridor Specific Plan Program EIR did not identify significant cumulative impacts associated with public utilities. Thus, development of the project in concert with

development planned for the Morena Corridor Specific Plan would not combine to result in cumulatively significant public utility impact.

6.2.13.3 Riverwalk Project

As discussed in Section 5.13, *Public Utilities*, the project would not result in the need to construct or substantially alter public utility systems or infrastructure. Existing off-site infrastructure currently serving the Specific Plan area would be sufficient to serve the project. The project's water demand has been considered in conjunction with other past, present, and reasonably foreseeable future development in the City through the WSA. This analysis determined that sufficient water supplies would be available to serve the project in conjunction with other development. The project also would not result in the need for new or altered off-site water systems. The project's water and sewer systems would be designed in conformance with City's standards. The project would result in a reduction of the projected peak sewer flow-rate due to a change in the uses on the project site. All projects in the City of San Diego would be required to comply with the City's Recycling Ordinance and prepare WMPs (for those that meet the 40,000-square-foot threshold) to show waste diversion measures as is required by the regional Integrated Waste Management Plan. These requirements are directed at ensuring cumulative impacts associated with solid waste would not be cumulatively significant. Thus, the project impact on public utilities has been analyzed, are not too speculative, and would not result in significant cumulative effects associated with public utilities. Therefore, the reason why the CPU Program EIR concluded impacts would remain significant and unmitigated is not applicable to the Riverwalk project and the project would not have a cumulatively considerable impact on public utilities.

6.2.14 Water Quality

The geographic scope for water quality would be the geographic scope for analysis of impacts related to hydrology and water quality is the San Diego Hydrologic Unit (No. 907.00), Lower San Diego Hydrologic Area (No. 907.10), and Mission San Diego Hydrologic Subarea (HSA) (907.11) per the Water Quality Control Plan for the San Diego Basin. Lands and water bodies within the watershed are part of an interrelated hydrologic system, such that modifications to a portion of a watershed or water pollution produced by development in one location may result in hydrology and water quality impacts that affect other water bodies in the watershed. The San Diego River is identified as an impaired water body in the most recent list of Clean Water Act Section 303(d) List of Water Quality Segments.

6.2.14.1 Mission Valley Community Plan

Future projects within Mission Valley and surrounding community planning areas could have a cumulative impact on water quality. However, all future development within the City and surrounding community planning Areas would be required to comply with all NPDES permit requirements, including the development of a storm water pollution prevention plan (SWPPP) if the

disturbed area covers one acre or more, or a Water Quality Control Plan if the disturbed area is less than one acre. Future projects would also be required to follow the City's Storm Water Standards Manual for drainage design and BMPs for treatment. Thus, cumulative water quality impacts would be less than significant and has been adequately analyzed.

6.2.14.2 Morena Corridor Specific Plan

The Morena Corridor Specific Plan Program EIR addresses cumulative impacts associated with hydrology and water quality in one section of that Program EIR and determined that future projects within the Morena Corridor Specific Plan area could contribute to cumulative impacts related to hydrology and water quality, including downstream flooding, water quality impacts, erosion, and sedimentation. However, like the project, all future development within the Morena Corridor Specific Plan area would be required to comply with all NPDES permit requirements, including the development of a SWPPP if the disturbed area covers one acre or more or a water quality control plan if the disturbed Standards Manual for drainage design and BMPs for treatment. Thus, the Morena Corridor Specific Plan Program EIR concluded that cumulative impacts would be less than significant. Thus, development of the project in concert with development planned for the Morena Corridor Specific Plan would not combine to result in cumulatively significant hydrology or water quality impact.

6.2.14.3 Riverwalk Project

As discussed in Section 5.14, *Water Quality*, The project would implement various construction and post construction BMPs to reduce impacts to receiving waters. Erosion and sediment controls would be used during construction activities to reduce the amount of soils disturbed, prevent erosion and sediment transport into receiving waters, and control/minimize pollutants in site runoff. Further, the project, as with the cumulative projects, would be in compliance with the Municipal and Construction General permits, and the City Storm Water Standards, and any runoff during construction and post-construction operations would be required to be minimized and treated through recommended LID site design and/or structural BMPs mandated by these measures. Construction and post-construction activities of the project and cumulative projects would be required to adhere to various impact avoidance and minimization measures consistent with Federal, State, and local regulations. Based on the described regional/watershed-based approach required for water quality issues in existing regulatory standards, as well as the fact that conformance with these requirements would be required for all identified projects within the cumulative project area (including the project), cumulative water quality impacts would be less than significant.

6.2.15 Public Services and Facilities

Public services and facilities generally serve residents on a community-wide basis. Thus, the geographic scope for analysis of public services and facilities is the Mission Valley Community Plan area.

6.2.15.1 Mission Valley Community Plan

The Mission Valley CPU Program EIR found that due to projected population growth in the CPU area, an increase in demand for public services and facilities is expected and new or improved public services and facilities infrastructure would be required to meet the needs of the City's future growth. However, no project level analysis of construct of police or fire stations or new parks and libraries were analyzed. The Mission Valley CPU Program EIR provided a policy framework that would help reduce potential impacts associated with the construction and operation of future public facilities needed to accommodate anticipated future growth. The City created Development Impact Fees (DIFs) as a means of collecting from future development projects to provide a funding source for future public facility improvements. Given that no construction details or their associated impacts were known at the time, the CPU Program EIR concluded it would be too speculative at the program level of analysis to identify significant impacts or mitigation measures for the potential impacts. Rather than terminate the analysis, the CPU Program EIR concluded the impact was significant and unmitigated.

6.2.15.2 Morena Corridor Specific Plan

As with development in the Mission Valley Community Plan area and the project, the Morena Corridor Specific would be subject to a community-wide IFS and future development consistent with the Morena Corridor Specific Plan would be required to pay applicable DIFs as future development occurs within that Specific Plan area. New development within the Morena Corridor Specific Plan would also mitigate its impact on school facilities with payment of impact fees to the school district pursuant to Senate Bill 50. The Morena Corridor Specific Plan Program EIR did not identify significant cumulative impacts associated with public services and facilities. Thus, development of the project in concert with development planned for the Morena Corridor Specific Plan would not combine to result in cumulatively significant public utility impact.

6.2.15.3 Riverwalk Project

Cumulative impacts to public facilities are also addressed by community wide Infrastructure Financing Studies (IFS) that identify necessary facility improvements and form the basis for development of DIFs for public facilities addressed in the study. The project would either pay the DIF to help finance the construction of future public facilities or provide community public facilities on-site that meet or exceed the value of the DIF. The project level analysis performed for Riverwalk as presented in Section 5.15, *Public Services and Facilities*, explains that the project would not result in significant impacts to public services and facilities. The project does not trigger the need to construct a new police, fire, or EMS facility in order to meet response times. The project does not trigger the need for a new library facility. Consistent with providing community public facilities, the project provides an expansive Riverwalk River Park on-site to help address the existing park deficiencies in the community. Therefore, the reason why the CPU Program EIR concluded impacts

would remain significant and unmitigated is not applicable to the Riverwalk project and the project would not have a cumulatively considerable impact on public facilities.

With regards to project impacts on school facilities and the need to construct new facilities, the project, like all new development with the City and state fully mitigates its impact to schools facilities by paying impact fees to the school district (San Diego Unified School District) pursuant to Senate Bill 50 (Chapter 407, Statute of 1998). Accordingly, the project does not result in cumulatively significant impacts associated with public services and facilities.

6.2.16 Health and Safety

The geographic scope for analysis of health and safety impacts is the western Mission Valley area; specifically, the project site and its immediate surroundings.

6.2.16.1 Mission Valley Community Plan

The Mission Valley CPU Program EIR determined that implementation of the CPU, which includes the development of the project site as the Riverwalk project, would not result in a cumulatively significant impact related to hazards and hazardous materials. As stated in the Mission Valley CPU Program EIR, compliance with Federal, State, regional, and local health and safety laws and regulations would address potential health and safety impacts. Potential health and safety impacts associated with wildfires, hazardous substances, emergency response and evacuation plans, and aircraft hazards would not combine to create cumulative impacts when viewed together with the potential growth that could occur within the CPU area and the surrounding communities. The impact has been adequately analyzed.

6.2.16.2 Morena Corridor Specific Plan

Likewise, the Morena Corridor Specific Plan Program EIR determined that implementation of that Specific Plan would not result in a cumulatively significant impact related to health and safety issues. Thus, in concert with the project, build-out of that Specific Plan would not combine to result in cumulatively significant impacts associated with hazards and hazardous materials.

6.2.16.3 Riverwalk Project

The project would be designed in accordance with applicable safety standards. The project site is not located within 0.25 mile of an existing or proposed school, and therefore would not result in hazardous emissions or the handling of hazardous emissions and substances or waste within 0.25 mile of an existing or proposed school. The project would not impair implementation of, or physically interfere with, an adopted emergency response or emergency evacuation plan. Although the project site is within the AIAs of San Diego International Airport and Montgomery-Gibbs Executive Airport, the project would not result in impacts associated with the ALUCPs for these

airports. Relative to hazards hazardous materials, potential hazards associated with hazardous materials are site-specific and would not combine to create a cumulatively significant impact.

As discussed in Section 5.16, *Health and Safety*, project approval would include conditions that ensure site specific significant impacts associated with hazardous materials avoided.

7.0 EFFECTS FOUND NOT TO BE SIGNIFICANT

Section 15128 of the State CEQA Guidelines requires an EIR briefly describe potential environmental effects of determined not to be significant and were, therefore, not discussed in detail in the EIR. Based upon initial environmental review, the following issue areas were determined not to have the potential to cause adverse effects, and therefore have not been addressed in detail in the EIR.

7.1 Agricultural Resources and Forestry

The project site is three nine-hole golf courses with driving range, clubhouse building, and associated facilities. The site does not contain land that is designated as prime agricultural soils by the Soils Conservation Service, nor does it contain prime farmlands designated by the California Department of Conservation. The site is not subject to, nor is it near, a Williamson Act contract site pursuant to Sections 51200-51207 of the California Government Code. The project site and surrounding area are designated as urban and developed land. There is no farmland located in proximity to the project site. Therefore, there would be no impacts associated with agricultural resources.

7.2 Mineral Resources

The project site is the location of a golf course. The site is not designated as a mineral resource area. The project would not result in the loss of availability of any mineral resources that would be of value to the region. Therefore, there would be no impact on mineral resources with the implementation of the project.

7.3 Paleontological Resources

Paleontological resources, or fossils, are the remains and/or traces of prehistoric plant and animal life. Fossils provide direct evidence of ancient organisms and document the patterns of organic evolution and extinction that have characterized the history of life. Fossil remains, such as bones, teeth, shells, and wood, are found in the geologic deposits (sedimentary rock formations) within which they were originally buried in deep bedrock layers of sandstone, mudstone, or shale. Paleontological resources contain not only the actual fossil remains, but also the localities where those fossils are collected and the geologic formations containing the localities.

The potential for fossil remains at a location can be predicted through previous correlations that have been established between the fossil occurrence and the geologic formations within which they are buried. For this reason, knowledge of the geology of a particular area and the paleontological resource sensitivity of particular rock formations make it possible to predict where fossils will or will not be encountered.

7.0 EFFECTS FOUND NOT TO BE SIGNIFICANT

Paleontological resource sensitivity is typically rated from high to zero depending upon the impacted formations. As described in Section 5.11 *Geologic Conditions*, the project area is underlain by artificial fill, alluvium, bedrock, and River Terrace Deposits.

The project would result in approximately 426,400 cy of cut and 1,454,000 cy of fill. The maximum depth of cut would be 24 feet and the maximum fill depth would be 32 feet. Paleontological monitoring during grading activities may be required if it is determined that the project's earth movement quantity exceeds the paleontological threshold (if greater than 1,000 cy and 10 feet deep for formations with a high sensitivity rating and if greater than 2,000 cy and 10 feet deep for formations with a moderate sensitivity rating). Monitoring may also be required for shallow grading (less than 10 feet) when a site has been previously graded and/or unweathered formations are present at the surface.

Per the County of San Diego Guidelines, paleontological sensitivity is defined as follows:

- **High Sensitivity:** High sensitivity is assigned to geologic formations known to contain paleontological localities with rare, well-preserved, critical fossil materials for stratigraphic or paleoenvironmental interpretation, and fossils providing important information about the paleobiology and evolutionary history (phylogeny) of animal and plant groups. Generally speaking, highly sensitive formations produce vertebrate fossil remains or are considered to have the potential to produce such remains.
- **Moderate Sensitivity:** Moderate sensitivity is assigned to geologic formations known to contain paleontological localities with poorly preserved, common elsewhere, or stratigraphically unimportant fossil material. The moderate sensitivity category is also applied to geologic formations that are judged to have a strong, but unproven potential for producing important fossil remains.
- **Low Sensitivity:** Low sensitivity is assigned to geologic formations that, based on their relatively youthful age and/or high-energy depositional history, are judged unlikely to produce important fossil remains. Typically, low sensitivity formations produce poorly-preserved invertebrate fossil remains in low abundance.
- **Zero Sensitivity:** Zero sensitivity is assigned to geologic formations that are entirely igneous in origin and therefore have no potential for producing fossil remains. Artificial fill materials are also placed in this category.

River Terrace Deposits are assigned a "moderate" sensitivity, and alluvium deposits are considered to have a "low" sensitivity for paleontological resources. Artificial fill and bedrock are not native geologic units and, therefore, have no potential for paleontological resources. Based on the proposed grading, only River Terrace Deposits would meet this threshold, as the maximum depth of grading would be 32 feet. River Terrace Deposits occur at depths of 12 to 30 feet below the surface. Thus, paleontological monitoring would be required. The project does not have the potential to disturb or destroy paleontological resources. Therefore, no impacts would occur.

7.4 Population and Housing

The project site currently does not contain housing. The Riverwalk project proposes housing that would result in an increase in population. However, as stated in Chapter 9.0, *Growth Inducement*, the project would not induce substantial population growth in the surrounding area, as the project is an in-fill, redevelopment project. Additionally, since the project does not propose the extension of new roads or other infrastructure into a previously undeveloped area, it does not have the potential to indirectly increase population or housing. Furthermore, the project does not displace existing housing, which could necessitate the construction of replacement housing elsewhere as no housing currently exists on-site. Therefore, the project does not have the potential to result in significant adverse environmental effects associated with population and housing.

8.0 SIGNIFICANT IRREVERSIBLE ENVIRONMENTAL CHANGES

This section addresses irreversible environmental changes that would be involved should the project be implemented.

8.1 Introduction

As required by Section 15126.2(c) of the CEQA Guidelines, the significant irreversible environmental changes of a project shall be identified. Irreversible commitments of non-renewable resources are evaluated to assure that their use is justified. Irreversible environmental changes typically fall into three categories: primary impacts, such as the use of nonrenewable resources; secondary impacts, such as highway improvements that provide access to previously inaccessible areas; and environmental accidents associated with a project. Section 15126.2(d) of the CEQA Guidelines states that irretrievable commitments of resources should be evaluated to assure that current consumption of resources is justified.

8.2 Impacts Related to Nonrenewable Resources

As evaluated in Section 5.4, *Biological Resources*, the project would result in direct impacts to vegetation communities and jurisdictional waters and an indirect impact to sensitive wildlife species. In accordance with the City's Biology Guidelines, these impacts would be considered significant and would require mitigation at ratios prescribed by the City's Biology Guidelines. Impacts to approximately 0.64 acre of wetland/riparian vegetation communities and open water would also be considered significant. Indirect construction impacts on sensitive species would also occur. Impacts to biological resources would be fully mitigated through implementation of the mitigation measures outlined in Section 5.4. The project would comply with the City MSCP, including MHPA LUAGs and required avoidance and minimization measures. Project consistency with the MSCP would ensure that cumulative impacts to vegetation, sensitive species, jurisdictional resources, or wildlife movement would not occur as a result of the project. The project's creation of a mitigation bank on-site would allow for mitigation area of future projects while capacity is available, further allowing for future projects elsewhere along the river to mitigate their biological resources impacts.

Project construction has the potential to disturb previously unidentified archaeological and tribal cultural resources. Such impacts would not be reversible. They would, however, be mitigated to below a level of significance as described in Sections 5.6, *Historical Resources*, and 5.10, *Tribal Cultural Resources*.

8.0 SIGNIFICANT IRREVERSIBLE ENVIRONMENTAL CHANGES

Development would occur as a result of the project that would entail the commitment of energy and natural resources. (See Section 5.7, *Energy*, for a discussion of energy use associated with the project.) The primary energy sources would be electricity, natural gas, and fossil fuels. Use of electricity, natural gas, and fossil fuels represents an irreversible commitment of these resources. Construction of the project would also require the use of various raw materials, including cement, concrete, lumber, steel, etc. These resources would also be irreversibly committed. Once constructed, use of the project would entail a further commitment of energy resources in the form of fossil fuels and electricity. This commitment would be a long-term obligation since the Specific Plan would result in the development of structures that are likely to have a useful life of 20 to 30 years or more.

As presented in Section 5.7, *Energy*, the project would increase demand for energy in the project area and SDG&E's service area. However, no adverse effects on non-renewable resources are anticipated. The project would follow UBC and Title 24 requirements for energy efficiency and would incorporate sustainable design features directed at reducing energy consumption. Additionally, the project would be consistent with the City's CAP and would include roofing materials with a minimum three-year aged solar reflection and thermal emittance or solar reflection index equal to or greater than the values specified in the voluntary measures under California Green Building Standards Code; or would include roof construction that has a thermal mass over the roof membrane, including areas of vegetated (green) roofs weighing at least 25 pounds per square foot as specified in the voluntary measures under California Green Building Standards Code; or would provide a combination of these two design features. The project would also utilize low-flow fixtures, to include kitchen faucets; maximum flow rate not to exceed 1.5 gallons per minute at 60 psi; standard dishwashers with water use of 4.25 gallons per cycle; compact dishwashers with water use of 3.5 gallons per cycle; and clothes washers with a water factor of six gallons per cubic feet of drum capacity. These features would contribute to more energy- and water-efficient buildings, supporting Strategy 1 as outlined by the CAP Consistency Checklist. In addition, the project includes electric vehicle parking spaces with the necessary electric vehicle supply equipment installed to provide active electric vehicle charging stations ready for use by residents, supporting Strategy 3 of the CAP Consistency Checklist. The impact of increased energy usage is not considered a significant adverse environmental impact.

8.3 Other Environmental Changes

As evaluated in Chapter 7.0, *Effects Found Not to be Significant*, implementation of the project would not result in significant irreversible impacts to agricultural, forestry, mineral, or paleontological resources. The project site is currently accessible via regional transportation facilities and local roadways. The immediate vicinity is largely developed with residential uses to the north and west, commercial retail and hospitality uses to the east, and a mix of office, residential, and hotel uses to the south. No new freeways or roadways are proposed that would provide access to currently

8.0 SIGNIFICANT IRREVERSIBLE ENVIRONMENTAL CHANGES

inaccessible areas. Therefore, implementation of the project would not result in a significant irreversible commitment with regard to unplanned land use.

The project would not involve road or highway improvements that would provide access to previously inaccessible areas other than the project site. Portions of the Specific Plan area located along the San Diego River and near the western boundary are mapped as VHFHSZ. The developed nature of the proposed project, installation of irrigated landscaping, and installation of hydrants for fire suppression within project streets is expected to provide *an additional line of defense* for nearby existing development over a condition in which the site remains undeveloped. No major environmental hazards are anticipated to occur as a result of project implementation as discussed in Section 5.16, *Health and Safety*.

9.0 GROWTH INDUCEMENT

In accordance with Section 15126(d) of the State CEQA Guidelines, an EIR must include an analysis of the growth-inducing impacts of the project. The growth inducement analysis must address: (1) *the ways in which the proposed project could foster economic or population growth, or the construction of additional housing, either directly or indirectly in the surrounding environment*; and (2) *the potential for the project to encourage and facilitate other activities that could significantly affect the environment, either individually or cumulatively*. This second issue involves the potential for the project to induce further growth by the expansion or extension of existing services, utilities, or infrastructure. The State CEQA Guidelines further state that *[i]t must not be assumed that growth in any area is necessarily beneficial, detrimental, or of little significance to the environment* (Section 15126.2[d]). The City of San Diego's CEQA Significance Determination Thresholds state that a project would have a significant impact related to growth inducement if it would:

1. *Induce substantial population growth in an area;*
2. *Substantially alter the planned location, distribution, density, or growth rate of the population of an area; or*
3. *Induce extensions of roads or other infrastructure not assumed in the community plan or adopted Capital Improvement Project list, when such infrastructure exceeds the needs of the project and could accommodate future development.*

Relative to growth inducement and based on the *CEQA Significance Determination Thresholds* (July 2016), the EIR must analyze the consequences of growth. According to Section 15126.2 (d) of the CEQA Guidelines, *It must not be assumed that growth in any area is necessarily beneficial, detrimental, or of little significance to the environment*. In general, the analysis must avoid speculation and focus on probable growth patterns or projections. Conclusions must also be presented that determine whether this impact is significant and/or unavoidable, and provide for mitigation or avoidance, as necessary.

9.1 Short-term Effects

During construction activities associated with the project, demand for various construction trade skills and labor would increase. However, it is anticipated that this demand would be met by the local labor force and would not require importation of a substantial number of workers that could cause an increased demand for temporary or permanent housing in this area. Further, construction of the project is divided into three five-year phases. While the size of the project would require a construction period longer than most projects, construction would nonetheless be short-term and temporary. It would not lead to an increase in employment on-site that would stimulate the need for additional housing or services. Therefore, no associated substantial short-term growth-inducing effects would result.

9.2 Long-term Effects

The project site has been previously developed as a golf course and continues to operate as such today. The population of the San Diego region has been increasing at twice the rate of the production of new housing in the region, and the City is behind in the production of its Regional Housing Needs Assessment (RHNA) allocation for 2010-2020 by approximately 50,000 units. Over the past 15 years, the San Diego region's economy grew by roughly 80 percent, and its population increased by 15 percent. This growth, however, has outpaced the housing construction necessary to accommodate San Diegans. Between 2007 and 2015, the City's population grew by about 15,000 persons annually, while the City averaged only an additional 3,000 housing units per year. The production of housing remains out of step with the region's long-term outlook for a steady household size of 2.8 to 2.9 persons (San Diego Housing Commission [SDHC] 2017).

A longer historic perspective demonstrates how much San Diego's current housing production falls short when compared to previous periods of growth. From 1970-1990, housing production consistently grew by more than three percent annually, with a brief, four-year exception during the early 1980s. In contrast, today's housing production growth rate is 0.6 percent (SDHC 2017). This discrepancy is contributing to rising rents and housing purchase prices across the City, such that an increasing percentage of low- and moderate-income persons cannot afford to rent or buy a home. The SDHC has concluded that in order to meet the City's housing needs, it will be necessary to rezone and redevelop existing parcels to increase density, especially around major transit stops (including BRT stops), as well as to develop currently underutilized and vacant parcels.

The proposed project would include 4,300 multi-family residential units, of which ten percent would be built as affordable housing reserved for income-qualified households. The project would therefore: (1) help to reduce the existing shortfall in the City's RHNA allocation for 2010-2020; (2) provide much-needed housing for low- and moderate-income households in the region, including critical affordable housing; (3) convert a currently underutilized golf course to a housing use at a density that would be consistent with Mission Valley Community Plan and with the densities of the surrounding community; and (4) provide housing in proximity to transit opportunities, given the location of the Fashion Valley Transit stop approximately 0.3-mile from the Specific Plan area.

The Specific Plan would allow for redevelopment of the project site and provides a mix of uses located within the existing circulation network and infrastructure on previously developed land. The Specific Plan would allow for increased population and employment opportunities. Due to the in-fill redevelopment nature of the project, the project would not foster growth, either directly or indirectly, as the project is accommodating the population that currently exists and would not open up a new area of land for population growth. The project would not substantially alter the planned location, distribution, density, or growth rate of Mission Valley, adjacent communities, or the City as a whole.

Future residents living in the project may stimulate economic growth in the area by purchasing goods and services from the new and existing retail/commercial businesses in the vicinity. The area surrounding the site already has an extensive number of supporting retail and services to accommodate population growth at the project site. Rather than creating or inducing new growth, the project serves to direct the location and type of development based on land use planning concepts that promote a sustainable development easily accessible to transit and surrounding services. The project, therefore, would accommodate anticipated population growth in Mission Valley.

No significant pressure on local housing supply or demand different than what is already occurring in the region is expected to result from development of the project. Proposed residential development would accommodate growth and demand that is already occurring within the region. The project would not require the extension or expansion of roadways, public services, utilities, or infrastructure into areas currently without service. As a result, development of the project would not remove any physical barriers to growth. Therefore, growth inducement would not be significant as a result of the project.

10.0 PROJECT ALTERNATIVES

10.1 Introduction

In accordance with Section 15126.6(a) of the CEQA Guidelines, an EIR must contain a discussion of *a range of reasonable alternatives to the project, or to the location of a project, which would feasibly attain most of the basic objectives of the project but would avoid or substantially lessen any of the significant effects of the project, and evaluate the comparative merits of the alternatives*. Section 15126.6(f) further states that *the range of alternatives required in an EIR is governed by a 'rule of reason' that requires the EIR to set forth only those alternatives necessary to permit a reasoned choice*. Thus, the following discussion focuses on project alternatives that are capable of eliminating significant environmental impacts or substantially reducing them as compared to the project, even if the alternative would impede the attainment of some project objectives, or would be more costly. In accordance with Section 15126.6(f)(1) of the State CEQA Guidelines, among the factors that may be taken into account when addressing the feasibility of alternatives are: (1) site suitability; (2) economic viability; (3) availability of infrastructure; (4) general plan consistency; (5) other plans or regulatory limitations; (6) jurisdictional boundaries; and (7) whether the proponent can reasonably acquire, control, or otherwise have access to the alternative site. Additionally, a discussion on alternatives that were considered but rejected from further detailed analysis is provided.

10.2 Project Objectives

In accordance with State CEQA Guidelines Section 15126.6(a), the project alternatives are assessed relative to their ability to (1) meet the basic objectives of the project and (2) avoid or substantially lessen the significant effects of the project. Therefore, in developing the alternatives to be addressed in this section, consideration was given regarding an alternative's ability to meet the objectives of the project. The project objectives associated with the Riverwalk Specific Plan and related actions are:

- Create a focused long-range plan intended to promote increased residential density and employment opportunities consistent with the General Plan, Mission Valley Community Plan, San Diego River Park Master Plan, and the Climate Action Plan.
- Assist the City's housing supply needs by providing a range of housing, including both market rate and deed-restricted affordable units, proximate to transit, jobs, amenities, and services.
- Implement the City of Villages goals and smart growth principles by creating a mixed-use neighborhood with housing, commercial, employment, and recreation opportunities along transit while restoring a stretch of the San Diego River.
- Create a transit-accessible mixed-use development in a central, in-fill location.

- Promote multi-modal travel (pedestrian and bicycle friendly corridors) through the project site through on-site trails, paths, and sidewalks that connect to internal and adjacent amenities and services throughout Mission Valley.
- Construct a new Green Line Trolley stop easily accessible from within Riverwalk and to adjacent surrounding residential and employment areas.
- Design a neighborhood that integrates the San Diego River through active and passive park uses, trails, and resource-based open space.
- Allow for the establishment and creation of a habitat Mitigation Bank that provides long-term habitat conservation and maintenance.
- Improve the Fashion Valley Road crossing that:
 - Provides expanded storm water flow volume accommodating a 10- to 15-year storm event;
 - Improves emergency response times by facilitating north-south vehicular access in storm events; and
 - Expands active transportation circulation by providing sidewalks and a buffered two-way cycle track.
 - Modernizes flood control gate operations in the project vicinity.
- Celebrate and interpret important cultural and historic resources within the Specific Plan area.

10.3 Significant Impacts of the Proposed Project

The review of alternatives includes an evaluation to determine if any specific significant environmental effect(s) would be *substantially less* than the project. A significant effect is defined in Section 15382 of the CEQA Guidelines as *a substantial, or potentially substantial, adverse change in any of the physical conditions within the area affected by the project.*

Based on the analysis contained in Chapter 5.0 of this EIR, project implementation would result in significant impacts associated with air quality (operations); direct and indirect impacts associated with biological resources; and direct impacts associated with historical resources, noise, and tribal cultural resources. Mitigation measures have been identified that reduce impacts to below a level of significance for these significant impacts, with the exception of air quality.

As addressed in Chapter 6.0, *Cumulative Effects*, , cumulative impacts have been evaluated for build-out of the Mission Valley Community Plan as part of the Mission Valley CPU Program EIR. Cumulative impacts at the Community Plan build-out level included the Riverwalk project. As concluded in Chapter 6.0, the project would not result in cumulative impacts beyond those already addressed in Mission Valley CPU Program EIR.

10.4 Alternatives Considered but Rejected

The following alternatives were considered for the project. These alternatives were rejected from further consideration as these alternatives would not reduce or avoid and may increase significant impacts associated with the project and would not meet the project objectives.

10.4.1 Alternative Locations

Consideration was given to alternative sites located within the Mission Valley community, as well as other areas in the City, where the project could occur. In accordance with CEQA Guidelines Section 15126.6(f)(2), identifying possible alternative locations focused on sites where *any of the significant effects of the project would be avoided or substantially lessened by putting the project in another location. Only locations that would avoid or substantially lessen any of the significant effects of the project would need to be considered for inclusion in the EIR.*

The project proposes an integrated mixed-use project on approximately 195 acres within the Mission Valley community. The project requires a large land mass to aggregate the types and intensities of development to create the viable mix of uses that would form a successful neighborhood and community center. Additionally, such a site must be accessible by public transit. There is only one other area within Mission Valley of sufficient size that could develop in a manner similar to that proposed by the project: the SDCCU (formerly Qualcomm) Stadium site, located in the eastern portion of the community. The SDCCU Stadium site is currently being planned for redevelopment by San Diego State University as a new stadium and mixed-use project. The SDCCU Stadium site is not owned by the project applicant and is not available to the applicant for the project.

While there may be areas in other portions of the City that remain undeveloped and of appropriate size to develop the project, these sites could be constrained to a greater degree by environmental resources, do not share the same qualities as the project site with respect to transit and accessibility, or would result in similar or greater environmental effects. The project is proposed on a developed golf course site, which is centrally located within the City and the Mission Valley community, and is under one ownership. The site has easy access to public streets and freeways and would be served by existing transit, as well as a new trolley stop provided by the project. Large landholdings that could accommodate the project could be further removed from existing infrastructure and lack access to transit. Traffic impacts from alternative sites could result in greater VMT than the project.

The project would result in significant unmitigated operational impacts relative to air quality. Operational impacts are primarily related to traffic and area sources (i.e. consumer products, architectural coating, and landscape equipment). Relocating the project to another site within the

City would result in the same or greater air quality impacts, as the size and scope of the project would remain the same, possibly requiring more and longer trips due to lack of proximity to transit and a mix of existing uses.

The project would result in impacts to sensitive biological resources that would be fully mitigated. Other sites could have greater amount of sensitive biological resources than those at project site (potentially unmitigable), limiting development potential and resulting in greater impacts. Thus, locating the project on an alternative site in the City would not avoid or substantially lessen the project's impacts and could result in greater environmental effects. Furthermore, the project applicant does not own any other properties within the City of a size to accommodate the project. For these reasons, there are no other feasible alternative locations for the project as proposed. Finally, the site is being proposed for land uses that are consistent with the Community Plan's identified land use and zoning; there are no land use conflicts that would be avoided by analyzing an alternative site. For these reasons, no alternative site location was analyzed in detail within the EIR.

10.4.2 Wetlands Avoidance Alternative

The Mobility Element of the Mission Valley Community Plan identifies Fashion Valley Road to be widened from its existing functional classification of a 4-Lane Collector without Two-Way Left-Turn Lane to its ultimate classification of a 4-Lane Major Arterial with a raised median and a two-way Class IV Cycle Track along the west side of the roadway. The project includes improvements to widen a portion of Fashion Valley Road along the project frontage to its ultimate classification per the Community Plan.

As evaluated in Section 5.4, *Biological Resources*, implementation of the project would result in a direct impact to 0.64 acre of wetland/riparian vegetation communities (southern cottonwood-willow riparian forest, and coastal and valley freshwater marsh), due to the construction of improvements to Fashion Valley Road. The project would also result in an indirect impact to sensitive bird species during project construction due to increased noise levels. A Wetlands Avoidance alternative was considered that would develop the project without improvements to Fashion Valley Road, thereby avoiding direct impacts to wetland/riparian vegetation. However, indirect impacts to biological resources would still occur, as construction activities associated with site development would have the potential to increase noise levels proximate to sensitive biological resources.

The Wetlands Avoidance alternative would reduce impacts to historical resources, as less grading would occur in areas where archaeological resources are known to occur, and monitoring would be required in other areas of the project site, as is the case with the project. Other than avoiding significant direct impacts to biological resources and reducing impacts to historical resources, the Wetlands Avoidance alternative would not avoid or reduce any other projects impact and may result in increasing effects associated with flooding and emergency access. The expanded storm water flow volume, accommodating a 10- to 15-year storm event, would not be provided under this

alternative. Seasonal flooding of the San Diego River would occur as it does periodically today, and there would not be increased north-south vehicular access in storm events that would be associated with the improvements to Fashion Valley Road.

This alternative would not meet some of the project's fundamental objectives. Specifically, this alternative would not improve the Fashion Valley Road crossing of the San Diego River by replacing it with a facility with a soft-bottom condition for the San Diego River; would not provide expanded storm water flow volume, accommodating a 10- to 15-year storm event; would not increase emergency access in storm events; and would not expand active transportation circulation by providing sidewalks and a buffered two-way cycle track.

The project's proposed improvements would enhance circulation for the community, allow for vehicular crossing up to 10- to 15-year flood events thereby providing for improved north-south circulation and minimize impacts to biological resources to the extent possible. There is no feasible alternative that could avoid impacts to wetlands and still provide roadway improvements as identified in the Mission Valley Community Plan. Therefore, this alternative has been rejected from further consideration.

10.4.3 No Project/Development Under Existing Plan (Levi Cushman Specific Plan)

When the project is the revision of an existing land use or regulatory plan, policy, or on-going operation, CEQA Guidelines Section 15126.6(e) requires addressing a "no project" alternative that would be the continuation of the existing plan, policy, or operation into the future. In the case of the Riverwalk project, the existing 1987 Levi-Cushman Specific Plan is in effect on the project site. In accordance with CEQA Guidelines Section 15126.6(e), the No Project/Development Under Existing Plan alternative evaluates an alternative where development of the site would occur under the existing Levi-Cushman Specific Plan.

As presented in Chapter 2.0, *Environmental Setting*, the Levi-Cushman Specific Plan, approved in 1987, is currently in effect for the project site. The 200-acre Levi-Cushman Specific Plan houses the majority of the Riverwalk Golf Course [which operates under Conditional Use Permit (CUP) No. 94-0563]] and is comprised of the 195 acres proposed for redevelopment with the Riverwalk Specific Plan and a five-acre parcel owned by MTS. The Levi-Cushman Specific Plan is proposed to be rescinded as part of the project actions. Development of the project site under the existing Levi-Cushman Specific Plan would not reduce or avoid any of the significant impacts associated with the project and would increase impacts and/or cause new impacts not associated with the project. Therefore, development under the Levi-Cushman Specific Plan has been rejected from further consideration as discussed below.

The Levi-Cushman Specific Plan identifies the project site for a mix of residential, retail, office, hotel, and recreational uses. (See Figure 2-8, *Levi-Cushman Specific Plan Land Use Map*.) Pursuant to the Levi-Cushman Specific Plan, development would result in total development intensity of 5.3 million square feet, comprised of 1,329 residential units; 1,000 hotel rooms; 200,000 square feet of commercial retail space; 2,582,000 square feet of office; approximately 40 acres of river open space (the river channel), 11 acres of recreational open space, and 25 acres of landscaped or project open space; and a total of 66,955 ADT. In order for the Levi-Cushman Specific Plan to proceed, it would require subsequent entitlement permits and rescinding or amending CUP No. 94-0563, which is in effect for the existing Riverwalk Golf Course.

As part of the Levi-Cushman Specific Plan, the San Diego River would be channelized through the project site. The channelization would be 400 to 500 feet in width and approximately 26 feet in depth, constructed to carry the 100-year flood projected by the USACOE. The channelization would reduce the floodway from approximately 106 acres to 40 acres, allowing for a larger development area within the area reclaimed by channelization. A 25-foot-wide buffer would be provided on either side of the river that would contain a planted barrier to prevent direct access to the river and habitat areas and may contain pedestrian and bike paths, landscaped areas, and passive recreation areas. The edges and banks of the river channel would be riparian woodland, wetland marsh, and other habitat areas. Three habitat islands would be included to increase the total area of wetland vegetation.

A key element of the Levi-Cushman Specific Plan is the creation of a 12-acre island located along the southern edge of the San Diego River to accommodate small-scale specialty retail, office, and residential uses and a dramatic tower theme feature (with reference to a tower element such as the Seattle Space Needle). The island would have a 40-foot canal on the south side to create a waterside environment of retail, office, and pedestrian uses. The canal would provide for a manufactured lake, separate from the San Diego River, that would accommodate paddleboats or similar water-oriented rides. A bridge of up to 50 feet in width would span from the north shore of the island for pedestrian use, commercial kiosks, and transit shuttles that would provide 100-year crossing, as well as emergency access.

Relative to roadways and transit, the Levi-Cushman Specific Plan calls for Fashion Valley Road to be upgraded to a 10-year flood level crossing. Where Fashion Valley Road crosses the river, it would be inundated at the time of a 100-year storm and cause a slight backwater upstream. The Levi-Cushman Specific Plan also includes a connection between Friars Road and Hotel Circle North (Levi-Cushman Specific Plan Street 'A', roughly in the location of the IOD for future public Street 'J'). Designed as a 100-year flood level crossing, this road would incorporate a weir structure to assure a perennial body of water within the project area. A trolley stop and transportation center would be provided within the center median of Levi-Cushman Specific Plan's road "Camino de la Reina" (roughly the location of Riverwalk Drive).

Development of the project site as approved in the Levi-Cushman Specific Plan would be consistent with the General Plan. It would also be consistent with the Mission Valley Community Plan, due to the Specific Plan Subdistrict CPIOZ-type A, which allows for an approved Specific Plan to remain in effect and allows for development per the approved Specific Plan.

The City's MSCP was approved after adoption of the Levi-Cushman Specific Plan. Development identified in the Levi-Cushman Specific Plan occurs in areas where the MHPA has been mapped. The Levi-Cushman Specific Plan would allow greater breadth of development at closer proximity to the San Diego River and would result in roadways that would cross the MHPA. Thus, development under this alternative has the potential increased indirect noise impacts to sensitive habitat along the river due to construction, in addition to other potential MHPA impacts, which may or may not be fully mitigable. This alternative would result in greater impacts than the project relative to MSCP and the MHPA LUAGs, because this alternative would develop urban uses both inside the San Diego River (on a 12-acre manufactured island) and closer to San Diego River than the Riverwalk project due to the channelization of the river.

Development under the Levi-Cushman Specific Plan would result in greater setbacks and more restrictive lot coverage and development intensity would be taller, specifically along Friars Road adjacent to existing uses. The Levi-Cushman Specific Plan does not include any buffering provisions from existing development and recommends the highest structures (up to 250 feet in height) to be located adjacent to existing multi-family residential development that are up to four stories in height and single and two-story commercial and office buildings in the northern and southern portions of the site, resulting in a stark contrast with the existing surrounding neighborhood. Additionally, the expansive setbacks along major circulation element roadways, such as Fashion Valley Road and Friars Road, would be more suburban in nature. Thus, this alternative would result in a greater change to the visual environment and neighborhood character.

The Levi-Cushman Specific Plan would result in the generation of greater traffic volumes than the project due to its greater development intensity. As such, a greater exceedance of air emission standards and, therefore, greater operational air quality impacts would result. Due to increased grading and construction associated with the Levi-Cushman Specific Plan, construction emissions would be greater than the project. The increase in traffic volumes would result in greater amount of trips and increased development intensity; therefore, a greater amount of GHG emissions would result when compared to the project.

Because grading associated with the No Project/Development Under Existing Plan alternative would be greater than the project, it could have the potential to disturb historical resources (archaeology), as well as tribal cultural resources to a greater extent than the project. Therefore, this alternative has the potential to result in greater impacts to subsurface archaeological resources than the project. The greater amount of grading would also result in a greater amount of impervious surfaces that would increase urban runoff to a greater extent than the project. The increase in urban runoff

carries with it the potential for an increase in urban pollutants entering sensitive water bodies, like the San Diego River. However, development under the Levi-Cushman Specific Plan would be required to implement BMPs as required by City regulations, which would preclude significant potential impacts to water quality.

This alternative would result in greater noise impacts during construction than the project, as a greater level of development intensity and larger developable area would result. Additionally, a greater level of temporary construction noise impacts on sensitive species would result, because construction would occur in closer proximity to the San Diego River than the project. This alternative would also result in greater operational noise than the project due to a greater level of traffic generation.

Development under the Levi-Cushman Specific Plan would result in a greater impact on public utilities than the project, because this alternative would result in greater development intensity. This alternative would generate a greater amount of solid waste during the grading, construction, and operational phases than the project.

Impacts associated the Levi-Cushman Specific Plan would be greater when compared to the project and would result in greater impacts to the MHPA, biological resources, historical resources, and tribal cultural resources. Additionally, because a greater amount of traffic would occur with this alternative, a greater amount of vehicular air emissions would result, exacerbating impacts to air quality and generating more GHG emissions. This alternative would also result in incrementally greater impact to energy, geologic conditions, hydrology, water quality, and public utilities.

Implementation of the Levi-Cushman Specific Plan would result in increased impacts when compared to Riverwalk, therefore, this alternative was rejected from further consideration.

10.5 Alternatives Considered

The alternatives identified in this analysis have been developed in order to further reduce or avoid significant environmental impacts associated with the project. These include the “no project” alternative that is mandated by CEQA and a Reduced Development Intensity alternative. The discussion of project alternatives in this section provides:

- A description of the alternative considered.
- The identification of the impacts of the alternative.
- A comparative analysis of the impacts of the alternative under consideration and the project. The focus of this comparative analysis is to determine if the alternative is capable of eliminating or substantially reducing the significant environmental effects of the project.
- A determination as to whether the alternatives meets the objectives of the project.

Table 10-3, *Comparison of Alternatives to Project*, presented at the end of this section provides a comparison of environmental issues for all alternatives analyzed in this section.

10.5.1 Alternative 1 – No Project/No Build

CEQA Guidelines Section 15126.6(e) requires that an EIR evaluate a “no project” alternative, along with its impacts. The purpose of describing and analyzing a no project alternative is to allow a lead agency to compare the impacts of approving the project to the impacts of not approving it. Specifically, Section 15126.6(e)(3)(B) requires that an EIR for a development project on an identifiable property address the no project alternative as *circumstances under which the project does not proceed*. In other words, the no project assumes that the project site would not be developed with the project.

Under the No Project/No Build alternative, the project would not be implemented on the site. None of the improvements resulting from the project would occur: a mixed-use development would not be established; no additional housing or employment uses would be created; Fashion Valley Road would not be improved; a new trolley stop would not be provided; and a new expansive Riverwalk River Park would not be created to serve the community. Instead, the site would be left as it exists today and the golf course would remain in operation.

10.5.1.1 Environmental Analysis

Land Use

The project site is currently entitled under the Levi-Cushman Specific Plan and operates as the Riverwalk Golf Course with an approved CUP. Under the No Project/No Build alternative, the golf course would continue operation until such a time that the CUP expires or the golf course ceases operation. Continued operation of the Riverwalk Golf Course in accordance with CUP 94-0563 would not result in potential impacts relative to MHPA adjacency, as the land use in effect is minimally disruptive to the natural environment and would involve no new grading or development. As such, although impacts to the MHPA for indirect noise associated with the project would be fully mitigated, this alternative would be less impactful. Like the project, this alternative would not physically divide an established community and would not result in land uses that are incompatible with the Montgomery Field or SDIA ALUCPs. This alternative would not require a deviation or variance, as no new development would occur.

This alternative would not implement goals and policies of the San Diego River Park Master Plan as no development would occur, but would also not preclude implementation of such features as the San Diego River Path at a later date. This alternative would be consistent with the Mission Valley Community Plan. This alternative would not fulfill the long-range planning goals for the community, the City, and the region.

Transportation and Circulation

Continued operation of the Riverwalk Golf Course, as would occur under this alternative, would not result in traffic and circulation impacts as no additional trips would be generated. Because the No Project/No Build alternative assumes continued operation under of the Riverwalk Golf Course and no new development, no transportation improvements would be required.

Transit opportunities in the project vicinity include bus service and the trolley. Pedestrian and bicycle opportunities are provided through sidewalks and bicycle lanes throughout Mission Valley. The No Project/No Build alternative would not affect bus and trolley service and would not affect existing pedestrian and bicycle facilities. However, this alternative would not provide an additional trolley stop or other improvements to pedestrian/bicycle accessibility and connectivity through the site and, therefore, would not result in the benefits to mobility options created by the project.

Visual Effects and Neighborhood Character

The No Project/No Build alternative would retain the existing golf courses uses and would not include any development, redevelopment, or alterations to the site or its appearance as it exists today. The project would not create a negative aesthetic on-site; similarly, this alternative would not create a negative aesthetic and it would also not result in an inconsistency relative to bulk, scale, materials, or style of the surrounding development, as no redevelopment would occur. Although the existing and planned character in the surroundings of the site continues to evolve and intensify, the existing low intensity use would not result in a substantial alteration to the surrounding character, as the use currently exists within the community fabric. The golf course use remains aesthetically compatible with the San Diego River that runs through it. This alternative would not create new sources of light or glare, as no redevelopment would occur on the golf course site. Like the project, this alternative would not result in significant impacts relative to visual effects and neighborhood character.

Biological Resources

The No Project/No Build alternative would avoid all impacts to biological resources, as no new development would occur. Thus, habitat restoration would not be required, and there would be no requirement to comply with Guideline B15 of the MSCP. The No Project/No Build alternative would result in fewer impacts to biological resources than what would occur with the project.

Air Quality

Under the No Project/No Build alternative, no changes to the existing site would result. No demolition, grading, and construction would occur. Therefore, the No Project/No Build alternative, would not have the potential to increase air emissions that would result during construction. Air emissions associated with golf course operations and use would continue, such as vehicles accessing the golf course and maintenance vehicles. The existing golf course operations would be consistent with and would not impair the implementation of the RAQS, SIP, and AQMP, as existing

development would have been taken into account in the preparation of those documents. No objectional odors would occur as a result of continued golf course operation and no exposure to toxic air contaminants or CO hot spots would occur, as no increase in vehicle trips would be anticipated. Because no redevelopment would occur, no new operational emissions would occur. Air quality impacts would be considered less than the project under this alternative.

Historical Resources

No grading would occur as a result of the No Project/No Build alternative, because the golf course would remain in operation as it exists today. As such, there would be no opportunity to encounter significant archaeological sites or unknown subsurface human remains. No potentially significant structures or sacred sites are located on the site that could be impacted by continued golf course operation. No historical resources impacts would result.

Energy

Under the No Project/No Build alternative, no increased demand for energy would be generated. Although a significant impact was not identified for the project, energy demand for the existing use would be substantially less than the Project.

Noise

The existing noise levels generated by the existing operations would continue under this alternative. Unlike the project, this alternative would not include demolition, grading, or construction; and no new operational noise sources would be created on-site. This alternative would result in less noise than what would occur with the project.

Greenhouse Gas Emissions

Under the No Project/No Build alternative, emissions would be associated with on-going operation and maintenance of the golf course. No new construction would occur. As no new development or emission would be generated, no GHG impacts would occur. Although a significant GHG impact was not identified for the project, generation of GHG emissions would be less under this alternative when compared to the project.

Tribal Cultural Resources

No grading would occur as a result of the No Project/No Build alternative, because golf course uses would remain in operation as it exists today. As such, there would be no impacts to tribal cultural resources.

Geologic Conditions

The on-going golf course operations that currently occur at the project site would continue under the No Project/No Build alternative. Although the project would not result in any significant impacts,

when compared to the project, this alternative would result in less impacts to geologic conditions relative to seismic events, as no development would be associated with the existing operations.

Hydrology

Existing site conditions would remain and no grading or development would occur as a result of the No Project/No Build alternative. No modifications to hydrology would occur. As such, flooding would continue to occur on-site, with off-site effects, as it does during storm events currently.

Improvements to Fashion Valley Road associated with the project would not occur, and periodic flooding that results in obstructing access would continue. Benefits to circulation and access would not occur under this alternative. Like the project, the No Project/No Build alternative would not result in impacts to hydrology beyond what exists today. However, because no improvements to flooding would occur, this alternative's impacts would be incrementally greater than the project.

Public Utilities

The No Project/No Build alternative would not affect public utilities. Sewer, water, gas, and electric services would continue to be provided as they are today. The No Project/No Build alternative would avoid impacts solid waste, as no construction or increased operational waste generation would occur. While the project would not result in significant impacts to public utilities, this alternative's environmental effect would be incrementally less than the project.

Water Quality

The No Project/No Build alternative would result in the continued golf course activities on the project site. The No Project/No Build alternative would not result in an increase in impervious surfaces. Runoff would continue as it occurs today. No water quality BMPs and improvements associated with the project would occur. It is not anticipated that significant impacts to water quality would occur under this alternative. While the project would not result in significant impacts to water quality, this alternative's environmental effect would be incrementally less than the project.

Public Services and Facilities

The No Project/No Build alternative would not result in development that would increase population resulting in a need to expand public services and facilities. Impacts to public services and facilities when compared to the project would be considered less. While the project would not result in significant impacts to public services and facilities, this alternative's environmental effect would be incrementally less than the project.

Health and Safety

Under the No Project/No Build alternative, there would be no change to existing conditions. Although the project would not result in any significant impacts, when compared to the project, the No Project/No Build alternative would result in fewer impacts including wildland fire, hazard

emissions, emergency response, and airport hazards, as no new structures would be introduced to the project site.

Cumulative Effects

The No Project/No Build alternative would not result in cumulative impacts, as no new development would occur. Thus, cumulative impacts under this alternative would be less than the project.

10.5.1.2 Evaluation of Alternative

The No Project/No Build alternative would result in no changes to the current site conditions. The project would not be implemented, and the Riverwalk Golf Course would remain in operation as it does today.

When compared to the project, the No Project/No Build alternative would avoid significant unmitigated operational air quality impacts associated with the project. The No Project/No Build alternative would avoid impacts to biological resources, including secondary noise impacts on sensitive biological resources. Habitat restoration and compliance with Guideline B15 would not be required. Because no redevelopment would occur under this alternative, there would be no potential to encounter significant archaeological sites or unknown subsurface human remains, and no new operational air emissions would occur. Additionally, the No Project/No Build alternative would avoid exposing sensitive receptors to potential health and safety risks, as no new land uses would occur on the site. However, because the No Project/No Build alternative would not result in improvements to Fashion Valley Road as proposed by the project, there would be no improvements to north-south vehicular access in storm events. Flooding would continue to occur on-site, with off-site effects, as it does during storm events currently. The No Project/No Build alternative would not improve hydrology the same as the project, but also would not result in significant impacts to hydrology beyond what exist today. The No Project/No Build alternative would not meet any of the project objectives.

10.5.2 Alternative 2 – Reduced Development Intensity/Operational Air Quality Impact Avoidance

As presented in Section 5.5, *Air Quality*, the project would result in a cumulatively significant impact associated with operational (vehicular) air emissions. Based on the size and scope of the project, there are no feasible measures for reducing air quality impacts; and impacts would remain significant and unmitigated.

A Reduced Development Intensity/Operational Air Quality Impact Avoidance alternative was evaluated that would reduce proposed development intensity to a level such that significant operational air quality impacts would be avoided. Development under this alternative would

develop the project site in the same locations and overall footprint as the project but would reduce development to 2,275 residential units, 106,000 square feet commercial retail space, and 700,000 square feet of commercial and office and non-commercial retail space. Thus, this alternative would result in 47 percent less residential units and 30 percent less commercial and office and non-commercial retail uses, as shown in Table 10-1, *Development Intensity Comparison - Proposed Project and Reduced Development Intensity/Operational Air Quality Impact Avoidance Alternative*. Areas for park, open space, and trails would remain the same as the project. Approximately 29,800 ADT would be generated by this alternative. Grading, on-site public street infrastructure, and improvements to Fashion Valley Road, would also remain the same as the project. This alternative would result in 6,028 EDUs. As such, some off-site roadway improvements required for the project may not be required under this alternative, as less development intensity would generate less traffic.

Future development under this alternative would have similar characteristics as the project, albeit at a reduced level, and would follow the Riverwalk Specific Plan design guidelines and development regulations proposed by the Riverwalk Specific Plan. This alternative would require application of zones that reflect the reduced development intensity and modifications to the proposed Riverwalk Specific Plan to reflect the land use intensity associated with this alternative.

Table 10-1. Development Intensity Comparison – Proposed Project and Reduced Development Intensity/Operational Air Quality Impact Avoidance Alternative

Land Use	Proposed Project	Reduced Development Intensity/Operational Air Quality Impact Avoidance Alternative
Residential	4,300 units	2,275 units
Commercial Retail Space	152,000 square feet	106,000 square feet
Office and Non-Commercial Retail Space	1,000,000 square feet	700,000 square feet
Park, Open Space, and Trails	Approximately 97 acres	No Change

10.5.2.1 Environmental Analysis

Land Use

Like the project, this alternative would be consistent with relevant policies and guidelines of the applicable plans similar to the project, including the Mission Valley Community Plan (and its Mobility Element with regards to improvements to Fashion Valley Road), as well as the San Diego River Park Master Plan. Additionally, this alternative would be consistent with the ALUCPs for Montgomery-Gibbs Executive Airport and San Diego International Airport. Like the project, development under this alternative would require deviations from the Land Development Code relative to ESL regulations.

Like the project, this alternative would not result in physically dividing an established community. Implementation of the Reduced Development Intensity/Operational Air Quality Impact Avoidance alternative would include a circulation network that connects through the project site and with the adjacent roadway network, similar to the project. As such, this alternative would facilitate connectivity in a similar manner as the project. Similarly, like the project, development under this alternative would also not result in land uses that are incompatible with the Montgomery Field or SDIA ALUCPs. This alternative would not, however, build-out at the level of intensity assumed for the project site in the Community Plan. Because of the much lower development intensity, this alternative would not be as transit-supportive as the project.

Future development under this alternative would occur in accordance design guidelines and development regulations proposed by the Riverwalk Specific Plan, which includes Tailored Development Standards. However, as with the project, those Tailored development Standards would not result in a significant environmental impact.

Like the project, this alternative would not result in conflict with the City's MSCP Subarea Plan or other approved local, regional, or State habitat conservation plan. Development would be located in the same areas as the proposed project. This alternative would require compliance with Guideline B15, as would the project, and would be required to implement conditions and mitigation measures similar to the project to ensure no significant impacts to wildlife habitat and sensitive species.

Relative to the Noise Element of the General Plan, like the project, this alternative would allow for residential development proximate to the I-8 freeway. The Riverwalk Specific Plan includes Policy R-18 regarding exterior useable open space, which prohibits residential balconies from fronting I-8 in areas that exceed an exterior noise level of 70 dBA CNEL. This policy would apply to this alternative and would preclude a land use incompatibility with regards to exterior noise levels. To avoid significant interior noise, interior noise levels would be required to meet implementation of construction techniques and materials required to meet Title 24 of the California Energy Code if noise standards are exceeded.

Transportation and Circulation

The Reduced Development Intensity/Operational Air Quality Impact Avoidance alternative is anticipated to also result in a less than significant impact on transportation and circulation, because the resident VMT per capita and employee VMT per employee would be at least 15 percent below the Regional Average VMT/Capita and Regional Average VMT/Employee, respectively. Like the project, this alternative would implement pedestrian, bicycle, and transit plans that would be consistent with adopted alternative transportation mode plans and policies. Transportation and circulation impacts would be less than significant, the same as with the project.

Visual Effects and Neighborhood Character

Like the project, this alternative would not create a negative aesthetic on the site, as buildout of the site would be compatible with the bulk, scale, materials, and style of the surrounding development. The Reduced Development Intensity/Operational Air Quality Impact Avoidance alternative would not result in a substantial alteration to the existing or planned character of the area as development would occur in accordance with the various design guidelines of the Riverwalk Specific Plan. By adhering to required regulations, the project would not create substantial light or glare that would adversely affect daytime or nighttime views in the area. This alternative would result in a project that is lower in scale and implements a reduced development intensity over the same development area as the project. Visually, this alternative would appear more suburban in nature rather than urban infill. But, like the project, this alternative would not result in significant impacts with regard to visual effects and neighborhood character.

Biological Resources

Grading required under this alternative would not change from that proposed for the project. Significant direct impacts would occur to wetland/riparian vegetation communities, as well as indirect impacts to sensitive bird species during project construction. However, construction would be less, as less development would occur under this alternative. Therefore, impacts to biological resources would be incrementally less than those identified with the project. This alternative would require implementation of mitigation measures as presented in Section 5.4, *Biological Resources*, to reduce potential impacts to below a level of significance.

Air Quality

Operational air quality impacts associated with this alternative would be avoided, as development intensity would be reduced to below significance thresholds. Additionally, because less development would occur, there would be a reduction in construction emissions. Thus, this alternative would result in less air quality impacts when compared to the project.

Historical Resources

Grading required with this alternative would be similar to the project. Therefore, impacts to historical resources (archaeology) would be the same as those identified with the project. Mitigation measures like those required for the project would be required for this alternative and would reduce impacts to below a level of significance, similar to the project.

Energy

Energy consumption under this alternative would be incrementally reduced with the decrease in development intensity. However, like the project, no adverse effects on non-renewable resources are anticipated. This alternative would comply with UBC and Title 24 requirements for energy efficiency and would incorporate sustainable design features directed at reducing energy consumption. Impacts would be less than significant, as would the project. Like the project, the

Reduced Development Intensity/Operational Air Quality Impact Avoidance would not result in significant impacts with regard to energy.

Noise

Like the project, temporary construction impacts to sensitive bird species would occur, and implementation of mitigation measures as required for the project would reduce impacts to below a level of significance. Because development intensity with this alternative would be less than the project, construction noise would be reduced and impacts to bird species during construction would be less. Like the project, depending on the size and location of ground-level HVAC units, an increase in ambient conditions may cause a significant impact which would require mitigation like that required for the project. This alternative would construct the Riverwalk River Park in the same manner as the project, and noise from performances at the proposed amphitheater within the Riverwalk River Park could result in significant noise impacts to sensitive wildlife species within the San Diego River corridor requiring mitigation as is required for the project to reduce impacts to below a level of significance. Like the project, noise associated with this alternative would not have an adverse impact on existing noise levels at neighboring sensitive properties.

Greenhouse Gas Emissions

Like the project, the Reduced Development Intensity/Operational Air Quality Impact Avoidance alternative would not conflict with the CAP or any other applicable plan, policy, or regulation adopted for the purpose of reducing emissions of greenhouse gases. Because less development would occur under this alternative than with the project, a lesser amount of GHG emissions would result. As with the project, impacts would be less than significant.

Tribal Cultural Resources

Grading associated with the Reduced Development Intensity/Operational Air Quality Impact Avoidance would be similar to the project; therefore, impacts to tribal cultural resources would be the same as those identified with the project. Mitigation measures like those required for the project would also be required for this alternative and would reduce impacts to below a level of significance. Overall, tribal cultural resources impacts would be similar to the project.

Geologic Conditions

Like the project, this alternative would involve development disturbance, albeit to a lesser degree, and like the project would require associated seismic and soil impacts. Similar to the project, this alternative would be required to implement standard grading and construction practices to ensure an acceptable level of risk. Geologic and soil impacts under this alternative would be avoided or reduced to below a level of significance through implementation of applicable design measures and geotechnical recommendations, as well as conformance with applicable regulatory/industry standard. Similar to the project, this alternative would not expose people or property to potentially substantial effects including the risk of life, injury, or death due to hazards such as earthquakes,

landslides, mudslides, ground failure, or similar hazard. Comparable to the project, impacts would be less than significant.

Hydrology

The Reduced Development Intensity/Operational Air Quality Impact Avoidance alternative would not result in a reduction of impervious surfaces when compared with the project. Building heights would be reduced under this alternative, but the development area would remain the same. Thus, hydrology impacts under this alternative would be the same as the project. For both the project and this alternative, no significant impacts would occur relative to hydrology and drainage.

Like the project, this alternative would not result in a substantial increase in runoff ,because it would be required to construct storm drain systems to handle project runoff consistent with City storm water regulations. Like the project, this alternative would not increase the water surface elevation downstream of the site, within the site, or upstream of the site, and all structures constructed within the floodway would be raised two feet above based flood elevation. No significant impacts associated with drainage and runoff would result. This alternative would not result in flood hazards to the project site or impose flood hazards on other properties, because like the project, development would be required to elevate habitable portions of the project site out of the 100-year floodplain.

Public Utilities

Like the project, this alternative would not result in impacts to water infrastructure and wastewater infrastructure that would be significant. This alternative would result in less demand on potable water supply due to reduced development intensity. Water consumption would not be significant under this alternative or the project. This alternative would generate solid waste during the grading, construction, and operational phases at a lower rate than the project, because less development would occur. Like the project, this alternative would be required to implement strategies outlined in a project-specific WMP through conditions of approval, as well as compliance with applicable City regulations related to solid waste, impacts would be less than significant. Like the project, this alternative would incorporate water sustainable design features, techniques, and materials that would reduce water consumption to below a level of significance. Additionally, this alternative would include landscaping consisting of native and drought-tolerant species consistent with the Landscape Regulations, resulting in an impact that would be less than significant. While this alternative would result in less impacts to public utilities, neither this alternative nor the project would result in significant impacts.

Water Quality

Like the project, the Reduced Development Intensity/Operational Air Quality Impact Avoidance alternative is not expected to substantially affect the quality of storm water runoff leaving this site compared to existing conditions. When compared to the project, this alternative would generate a

similar amount of in urban pollutants as the project. Although development intensity would be reduced, development would occur in the same development area as the project. Like the project, no short-term and long-term effects on local and regional water quality would result from implementation of this alternative. Like the project, this alternative would be required to implement BMPs as required by City regulations, which would preclude significant potential impacts to water quality. Thus, this alternative would result in the same level of no impacts to water quality as the project.

Public Services and Facilities

Development intensity under the Reduced Development Intensity/Operational Air Quality Impact Avoidance alternative would result in a decrease in residential units and a reduction in commercial space. Impacts to public services and facilities would be reduced with regards to police protection and fire/life safety protection as the project. This alternative would result in a decreased demand for public services such as schools, parks, and libraries, as this alternative would generate less people than would the project (4,232 residents under this alternative compared to 7,998 with the project, based on a generation rate of 1.86 persons per household). Thus, like the project, this alternative would not result in significant impacts to the public services and facilities.

Health and Safety

Like the project, the Reduced Development Intensity/Operational Air Quality Impact Avoidance alternative would not result in excessive use of hazardous materials, such as cleaning solvents; anticipated use would be at levels that would result in substantial hazardous emissions or waste. Industry standards are in place to ensure no risk to workers by hazardous materials during demolition and construction. Additionally, like the project, this alternative would not impair implementation of, or physically interfere with, emergency response plans or emergency evacuation plans. This alternative would also not result in conflicts with the applicable ALUCPs.

Due to the presence of previously-removed USTs along with the existing wastewater clarifier, there is the potential for the presence of arsenic and organochlorine pesticides in soils within the project site, which is regarded a potentially significant impact associated with health and safety. Former agricultural uses on the project site that ceased over 50 years ago, there is the potential for exposure to COCs, which is regarded a potentially significant impact associated with health and safety with the project and would also be the same with this alternative. Conditions required for the project would also be required for this alternative and would mitigate these impacts to below a level of significance.

Cumulative Effects

Based on the analysis contained in Chapter 6.0 of the EIR, cumulative impacts have been evaluated for build-out of the Mission Valley Community Plan as part of the Mission Valley CPU Program EIR. Cumulative impacts at the Community Plan build-out level include development of the project site at

a greater level of intensity than this alternative. In that manner, cumulative effects from this alternative would have already been anticipated in the Mission Valley CPU Program EIR. Like the project, this alternative would not result in cumulative impacts beyond those already addressed in the CPU Program EIR. Unlike the project, the air quality impacts (operational) of the project would not be cumulatively considerable. This alternative would have a lower intensity than buildout of the site anticipated in the Mission Valley Community Plan Program EIR; therefore, this alternative would not result in additional cumulative impacts.

10.5.2.2 Evaluation of Alternative

The Reduced Development Intensity/Operational Air Quality Impact Avoidance alternative would result in avoidance of cumulatively significant air quality impacts associated with operational (vehicular) emissions. Like the project, the Reduced Development Intensity/Operational Air Quality Impact Avoidance alternative would be subject to Policy R-18 of the Riverwalk Specific Plan prohibiting residential balconies fronting I-8 to occur where exterior noise levels exceed 70 dBA CNEL, which would preclude a land use incompatibility with regards to exterior noise levels due to locating residential development proximate to the I-8 freeway. Because grading required under this alternative would not change from that proposed for the project, impacts to biological resources, historical resources, and tribal cultural resources would not change from those associated with the project. Appropriate mitigation measures would be required as with the project. Relative to health and safety, the same potential for health risks associated with contaminated soils would occur under this alternative as would with the project, and the same mitigation measures would be required to ensure that impacts are reduced to below a level of significance.

This alternative would result in an incremental decrease in energy use, GHG emission, hydrology, water quality, and public utilities, because less development intensity and density would result under this alternative. However, no significant impacts to those environmental issue area would occur with the project. This alternative would incrementally reduce the potential for impacts associated with geologic conditions and soils. However, neither the project nor this alternative would result in significant impacts associated geologic conditions. With regards to public services and facilities, development intensity under the Reduced Development Intensity – Operational Air Quality Impact Avoidance alternative would contribute less impacts to schools, parks, and libraries. Like the project, this alternative would not result in significant impacts to the public services and facilities.

The Reduced Development Intensity – Operational Air Quality Impact Avoidance alternative would meet the following project objectives:

- Create a focused long-range plan intended to promote increased residential density and employment opportunities consistent with the General Plan, Mission Valley Community Plan, San Diego River Park Master Plan, and the Climate Action Plan.

- Create a transit-accessible mixed-use development in a central, in-fill location.
- Promote multi-modal travel (pedestrian and bicycle friendly corridors) through the project site including connectivity via open space areas.
- Construct a new Green Line Trolley stop easily accessible from within Riverwalk and to adjacent surrounding residential and employment areas.
- Design a neighborhood that integrates the San Diego River through active and passive park uses, trails, resource-based and a connected open space.
- Allow for the establishment and creation of a habitat Mitigation Bank that provides long-term habitat conservation and maintenance.
- Improve the Fashion Valley Road crossing that:
 - Provides expanded storm water flow volume accommodating a 10- to 15-year storm event;
 - Improves emergency response times by facilitating north-south vehicular access in storm events; and
 - Expands active transportation circulation by providing sidewalks and a buffered two-way cycle track.
 - Modernizes flood control gate operations in the project vicinity.
- Celebrate and interpret important cultural and historic resources within the Specific Plan area.

This alternative would meet other project objectives but at a substantially reduced level, as summarized below.

- Assist the City's housing supply needs by providing a range of housing, including both market rate and deed-restricted affordable units, proximate to transit, jobs, amenities, and services.

This alternative would result in a 47 percent reduction in housing, substantially reducing the amount of much needed housing (market-rate and affordable) that could occur with the project.
- Implement the City of Villages goals and smart growth principles by creating a mixed-use neighborhood with housing, commercial, employment, and recreation opportunities along transit while restoring a key stretch of the San Diego River.

In addition to the much reduce residential development that would occur with this alternative, this alternative would also result in 30 percent less commercial retail and office and non-commercial retail uses and, thus, would not implement the City of Villages goals and smart growth principles to the extent the that project would.

10.5.3 Alternative 3 – Reduced Development Intensity/Operational Air Quality Impact Avoidance and Minimized Historical/Tribal Cultural Resources Impacts

As presented in Section 5.5, *Air Quality*, the project would result in a cumulatively significant impact associated with operational (vehicular) air emissions. Based on the size and scope of the project, there are no feasible measures for reducing air quality impacts; and impacts would remain significant and unmitigated. Additionally, as presented in Section 5.6, *Historical Resources*, the project has the potential to result in direct impacts to known cultural sites as a result of grading needed to remove soils and render the site suitable for development. By eliminating areas of development where some subsurface resources occur, impacts would be reduced. Therefore, a Reduced Development Intensity/Operational Air Quality Impact Avoidance and Minimized Historical/Tribal Cultural Resources Impacts alternative was evaluated that reduces development intensity to a level such that significant operational air quality impacts would be avoided. Additionally, under this alternative, mixed-use development would be eliminated in areas where grading has the potential to affect significant historical resources and tribal cultural resources.

This alternative would develop the project site with a reduced development intensity that would result in: 2,200 residential units; 40,000 square feet commercial retail space; 900,000 square feet of commercial and office and non-commercial retail space and 114 acres of park, open space, and trails. This alternative would generate approximately 24,942 ADT and would result in 51 percent less residential units, 18 percent less commercial and office and non-commercial retail uses, and 17 percent more parks when compared to the project. This alternative would require application of zones that reflect the reduced development intensity and modifications to the proposed Riverwalk Specific Plan to reflect the land use intensity associated with this alternative. This alternative would result in 4,938 EDUs. As such, some off-site roadway improvements required for the project may not be required under this alternative, as less development intensity would generate less traffic. (See Table 10-2, *Development Intensity Comparison – Proposed Project and Reduced Development Intensity/Operational Air Quality Impact Avoidance and Minimized Historical/Tribal Cultural Resources Impacts Alternative*).

Table 10-2. Development Intensity Comparison – Proposed Project and Reduced Development Intensity – Operational Air Quality Impact Avoidance and Minimized Historical/Tribal Cultural Resources Impacts Alternative

Land Use	Proposed Project	Reduced Development Intensity – Operational Air Quality Impact Avoidance and Minimized Historical/Tribal Cultural Resources Impacts Alternative
Residential	4,300 units	2,200 units
Commercial Retail Space	152,000 square feet	40,000 square feet
Office and Non-Commercial Retail Space	1,000,000 square feet	900,000 square feet
Park, Open Space, and Trails	Approximately 97 acres	Approximately 114 acres

Future development under this alternative would have similar characteristics as the project, albeit at a reduced level, and would follow the same design guidelines and development regulations proposed by the Riverwalk Specific Plan as would the project. Grading and public street infrastructure, including improvements to Fashion Valley Road, would also remain the same as shown for the project with the following exceptions:

- Development would not occur on Lots 16 through 25 and Lots 39 and 40 (see Figure 10-1, *General Areas of Development Under the Reduced Development Intensity – Operational Air Quality Impact Avoidance and Minimized Historical/Tribal Cultural Resources Impacts Alternative*) to avoid potential disturbance of Sites SDI-11767 and SDI-12220.
- Development would not occur on Lot 31 to avoid potential disturbance of Site SDI-12126.
- Extension of Riverwalk Drive beyond its current western terminus, as well as development of Street 'J1' and Street 'J2' would not occur to avoid potential disturbance of Site SDI 11767.
- Construction of the Street 'J2' vehicular tunnel under the MTS trolley tracks would not occur, to avoid potential disturbance of Site SDI 11767.
- Development on Lots 32 through 37 would not occur, as these lots would not be afforded at least two methods of ingress and egress without Riverwalk Drive and Streets 'J1' and 'J2'.

As such, no development would occur south of the trolley tracks and north of the San Diego River (i.e., all of the Central District of the Riverwalk Specific Plan). Approximately one-third of the developable area in the North District would be removed. (See Figure 10-1, *General Areas of Development Under the Reduced Development Intensity – Operational Air Quality Impact Avoidance and Minimized Historical/Tribal Cultural Resources Impacts Alternative*.) Development density and intensity shown in Table 10-2 would be accommodated in the remaining portion of the North District and the South District.

10.5.3.1 Environmental Analysis

Land Use

This alternative would be generally consistent with the Mission Valley Community Plan (and its Mobility Element) with regards to improvements to Fashion Valley Road, as well as the San Diego River Park Master Plan, except as described below under Transportation and Circulation.

This alternative would be consistent with the ALUCPs for Montgomery-Gibbs Executive Airport and San Diego International Airport. Similarly, like the project, development under this alternative would also not result in land uses that are incompatible with the Montgomery Field or SDIA ALUCPs. This alternative would not, however, build-out at the level of intensity assumed for the project site in the Community Plan. Because of the much lower development intensity, this alternative would not be as transit-supportive as the project. Like the project, development under this alternative would require deviations from the Land Development Code relative to ESL regulations. Like the project, the Reduced Development Intensity/Operational Air Quality Impact Avoidance and Minimized Historical/Tribal Cultural Resources Impacts alternative would be consistent with the City of San Diego General Plan's applicable goals and policies and the City's Climate Action Plan.

Like the project, this alternative would not result in physically dividing an established community. Like the project, implementation of the Reduced Development Intensity/Operational Air Quality Impact Avoidance and Minimized Historical/Tribal Cultural Resources Impacts alternative would include a circulation network that connects through the project site and with the adjacent roadway network. As such, this alternative would facilitate connectivity in a similar manner as the project.

Future development under this would occur in accordance the design guidelines and development regulations proposed by the Riverwalk Specific Plan, which includes Tailored Development Standards. However, as with the project, those Tailored Development Standards would not result in a significant environmental impact.

Like the project, this alternative would not result in conflict with the City's MSCP Subarea Plan or other approved local, regional, or State habitat conservation plan. Development would be located in the same areas as the proposed project, This alternative would require compliance with Guideline B15, as would the project, and would be required to implement conditions and mitigation measures similar to the project to ensure no significant impacts to wildlife habitat and sensitive species.

Relative to the Noise Element of the General Plan, like the project, this alternative would allow for residential development proximate to the I-8 freeway. The Riverwalk Specific Plan includes Policy R-18 relative to exterior useable open space, which prohibits residential balconies from fronting I-8 in areas that exceed an exterior noise level of 70 dBA CNEL. This policy would apply to this alternative and would preclude a land use incompatibility with regards to exterior noise levels. To avoid significant interior noise, interior noise levels would be required to meet implementation of

construction techniques and materials required to meet Title 24 of the California Energy Code if noise standards are exceeded.

This alternative would not develop Riverwalk Drive to its ultimate classification per the Community Plan or Streets 'J1' and 'J2'; as such, this alternative would not be consistent with the Mission Valley Community Plan. However, major circulation element roadways would remain in place and the alternative would implement improvements to key roadways, such as Fashion Valley Road. Internal circulation would be accommodated to ensure compatibility with the existing and planned roadway network of the Mission Valley Community Plan.

This alternative would be consistent with the ALUCPs for Montgomery-Gibbs Executive Airport and San Diego International Airport. Like the project, development under this alternative would require deviations from ESL regulations. This alternative would be consistent with the policies and guidelines relative to the City's MSCP Subarea Plan.

In summary, this alternative would result in no change with regards to the analysis of land use impacts from what has been evaluated for the project.

Transportation and Circulation

This alternative would be generally consistent with the Mission Valley Community Plan (and its Mobility Element) with regards to improvements to Fashion Valley Road, as well as the San Diego River Park Master Plan, except this alternative would not develop:

- Riverwalk Drive as a two-lane Collector roadway, as the roadway would not be constructed beyond the terminus at the existing golf course clubhouse.
- Class II bike lanes along Riverwalk Drive from Fashion Valley Road to the trolley stop, as Riverwalk Drive would terminate at the existing golf course clubhouse.
- Streets 'J1' and 'J2' as two-lane Collector roadways.
- Class II bike lanes along Streets 'J1' and 'J2', as these roadways would not be constructed.

Like the project, the Reduced Development Intensity/Operational Air Quality Impact Avoidance and Minimized Historical/Tribal Cultural Resources Impacts alternative is anticipated to also result in a less than significant impact on transportation and circulation, because the resident VMT per capita and employee VMT per employee would be at least 15 percent below the Regional VMT/Capita and Regional VMT/Employee, respectively. Like the project, this alternative would implement pedestrian, bicycle, and transit plans that would be consistent with adopted alternative transportation mode plans and policies. Additionally, this alternative would not result in increased traffic hazards due to circulation network design, and would improve access by way of improvements to Fashion Valley Road. Like the project, transportation and circulation impacts would be less than significant.

Visual Effects and Neighborhood Character

This alternative would result in the same scale and intensity of development, and would occur in the same areas as the project except where development would be eliminated in areas to avoid impacts to cultural resources as previously described. A greater portion of the project site would not be developed with urban uses. Instead, development under this alternative would occur along Friars Road, broken up by a greater amount of open area, and then a smaller area of development area along Fashion Valley Road and at Hotel Circle North / Fashion Valley Road. While development under this alternative would appear visually different than what would occur with the project, like the project, this alternative would not create a negative aesthetic on the site. Development would occur in accordance with the Riverwalk Specific Plan, like the project, to ensure compatibility with the bulk, scale, materials, and style of the surrounding development. Thus, neither the project or this alternative would not result in a substantial alteration to the existing or planned character of the area. By adhering to required regulations, the project would not create substantial light or glare that would adversely affect daytime or nighttime views in the area. Like the project, this alternative would not result in significant impacts with regard to visual effects and neighborhood character.

Biological Resources

The Reduced Development Intensity/Operational Air Quality Impact Avoidance and Minimized Historical/Tribal Cultural Resources Impacts alternative would construct the Fashion Valley Road improvements, as with the project. As such, significant direct impacts would occur to wetland/riparian vegetation communities. Less grading would not occur under this alternative, which would reduce the indirect impacts to sensitive bird species during project construction. Nonetheless, this alternative would require implementation of mitigation measures as presented in Section 5.4, *Biological Resources*, to reduce potential impacts to below a level of significance.

Air Quality

Operational air quality impacts associated with this alternative would be avoided, as development intensity would be reduced to a level such that vehicular emissions would be below significance thresholds. Additionally, because less development would occur, there would be a reduction in construction emissions. Thus, this alternative would result in less air quality impacts when compared to the project.

Historical Resources

The Reduced Development Intensity, Operational Air Quality Impact Avoidance and Minimized Historical/Tribal Cultural Resources Impacts alternative would avoid potential impacts to three significant archaeological sites and a data recovery program would not be required. While mitigation measures required for the project would reduce impacts to below a level of significance for all cultural resources, this alternative would avoid disturbance to Sites SDI-11767, SDI-12220, and SDI-12126, resulting in reduced impacts to cultural resources.

Energy

Energy consumption under this alternative would be incrementally reduced with the decrease in development intensity. However, like the project, no adverse effects on non-renewable resources are anticipated. This alternative would comply with UBC and Title 24 requirements for energy efficiency and would incorporate sustainable design features directed at reducing energy consumption. Impacts would be less than significant, as would the project. Like the project, the Reduced Development Intensity/Operational Air Quality Impact Avoidance and Minimized Historical/Tribal Cultural Resources would not result in significant impacts with regard to energy.

Noise

Like the project, temporary construction impacts to sensitive bird species would also occur, and implementation of mitigation measures as required for the project would reduce impacts to below a level of significance. However, because less development would occur under this alternative, impacts would be reduced. Additionally, depending on the size and location of ground-level HVAC units, and increase in ambient conditions may cause a significant impact that would require mitigation like that required for the project. This alternative would construct the Riverwalk River Park in the same manner as the project, and noise from performances at the proposed amphitheater within the Riverwalk River Park could result in significant noise impacts to sensitive wildlife species within the San Diego River corridor requiring mitigation as is required for the project to reduce impacts to below a level of significance. Like the project, noise associated with this alternative would not have an adverse impact on existing noise levels at neighboring sensitive properties.

Greenhouse Gas Emissions

This alternative would result in less development intensity and, therefore, would generate less GHG emissions than the project. Like the project, the Reduced Development Intensity/Operational Air Quality Impact Avoidance and Minimized Historical/Tribal Cultural Resources Impacts would not conflict with the CAP or any other applicable plan, policy, or regulation adopted for the purpose of reducing emissions of greenhouse gases. Impacts would, therefore, be less than significant. Like the project, this alternative would not result in significant GHG emissions.

Tribal Cultural Resources

This alternative would avoid disturbance to Sites SDI-11767, SDI-12220, and SDI-12126, resulting in fewer potential impacts to tribal cultural resources. The Reduced Development Intensity/Operational Air Quality Impact Avoidance and Minimized Historical/Tribal Cultural Resources Impacts would avoid potential impacts to these sites, and data recovery would not be required. Nonetheless, this alternative would require mitigation measure, comprised of monitoring during ground-disturbing activities, which would reduce impacts to tribal cultural resources to below a level of significance.

Geologic Conditions

Like the project, this alternative would involve development disturbance, albeit to a lesser degree. Similar to the project, this alternative would be required to implement standard grading and construction practices to ensure an acceptable level of risk. Geologic and soil impacts under this alternative would be avoided or reduced to below a level of significance through implementation of applicable design measures and geotechnical recommendations, as well as conformance with applicable regulatory/industry standard. Similar to the project, this alternative would not expose people or property to potentially substantial effects including the risk of life, injury, or death due to hazards such as earthquakes, landslides, mudslides, ground failure, or similar hazard. Comparable to the project, impacts would be less than significant. Like the project, geologic and soil impacts under this alternative would be avoided or reduced to below a level of significance through implementation of applicable design measures and geotechnical recommendations, as well as conformance with applicable regulatory/industry standard.

Hydrology

Like the project, the Reduced Development Intensity/Operational Air Quality Impact Avoidance and Minimized Historical/Tribal Cultural Resources Impacts alternative would result in an increase in impervious surfaces from what exists currently, albeit less than the project due to the reduced development area. Also like the project, this alternative would not result in an increase in runoff because the alternative would be required to construct storm drain systems to handle project runoff consistent with City storm water regulations. No significant impacts associated with drainage and runoff would result. This alternative would not result in flood hazards to the project site or impose flood hazards on other properties, because habitable structures would be elevated in those portions of the project site in the 100-year floodplain. This alternative would not increase the water surface elevation downstream of the site, within the site, or upstream of the site. This alternative would result in greater pervious surfaces than the project, as no development would occur south of the trolley tracks (i.e., all of the Central District of the Riverwalk Specific Plan). Approximately one-third of the developable area in the North District would be removed. Thus, impacts under this alternative associated with hydrology would be less than those that are anticipated with the project (due to the diminished increase in impervious surfaces) and, like the project, would not be significant.

Public Utilities

Because this alternative would result in less development intensity and less development area, less impact to water infrastructure and wastewater infrastructure would occur. Like the project, impacts would not be significant. Like the project, this alternative would generate solid waste during the grading, construction, and operational phases; however, solid waste generation would be less due to less development intensity. Like the project, strategies outlined in a project-specific WMP through conditions of approval, as well as compliance with applicable City regulations related to solid waste, would be required to ensure impacts would be less than significant. Like the project, this alternative would incorporate water sustainable design features, techniques, and materials that would reduce

water consumption to below a level of significance. Additionally, this alternative would include landscaping consisting of native and drought-tolerant species consistent with the Landscape Regulations, resulting in an impact that would be less than significant as with the project.

Water Quality

The Reduced Development Intensity/Operational Air Quality Impact Avoidance and Minimized Historical/Tribal Cultural Resources Impacts alternative would result in less generation of urban pollutants that could affect sensitive water bodies, like the San Diego River, than the project due to an overall reduction in development area and intensity. Like the project, the Reduced Development Intensity/Operational Air Quality Impact Avoidance and Minimized Historical/Tribal Cultural Resources Impacts alternative is not expected to substantially affect the quality of storm water runoff leaving this site compared to existing conditions. No short-term and long-term effects on local and regional water quality would result from implementation of this alternative. Like the project, this alternative would be required to implement BMPs as required by City regulations, which would preclude significant potential impacts to water quality.

Public Services and Facilities

Development intensity under the Reduced Development Intensity/Operational Air Quality Impact Avoidance and Minimized Historical/Tribal Cultural Resources Impacts alternative would result in a decrease in residential units, and a reduction in commercial and office space. Impacts to public services and facilities would be less with regards to police protection and fire/life safety protection as the project. This alternative would also result in less demand for public services such as schools, parks, and libraries, than the project, as this alternative would generate less people than would the project (4,092 residents under this alternative compared to 7,998 with the project, based on a generation rate of 1.86 persons per household). This alternative would create approximately 17 percent more park space than the project, which would further reduce the Mission Valley Community Plan identified deficit of park space for Mission Valley. Like the project, this alternative would not result in significant impacts to the public services and facilities.

Health and Safety

Like the project, the Reduced Development Intensity/Operational Air Quality Impact Avoidance and Minimized Historical/Tribal Cultural Resources Impacts alternative would not result in excessive use of hazardous materials, such as cleaning solvents; anticipated use would be at levels that would result in substantial hazardous emissions or waste. Industry standards are in place to ensure no risk to workers by hazardous materials during demolition and construction. Additionally, like the project, this alternative would not impair implementation of, or physically interfere with, emergency response plans or emergency evacuation plans. This alternative would also not result in conflicts with the applicable ALUCPs. Due to the presence of previously-removed USTs along with the existing wastewater clarifier, there is the potential for the presence of arsenic and organochlorine pesticides in soils within the project site, which is regarded a potentially significant impact associated with

health and safety. Former agricultural uses on the project site that ceased over 50 years ago, there is the potential for exposure to COCs, which is regarded a potentially significant impact associated with health and safety with the project and would also be the same with this alternative. Conditions required for the project would also be required for this alternative and would mitigate these impacts to below a level of significance.

Cumulative Effects

Based on the analysis contained in Chapter 6.0 of the EIR, cumulative impacts have been evaluated for build-out of the Mission Valley Community Plan as part of the Mission Valley CPU Program EIR. Cumulative impacts at the Community Plan build-out level include development of the project site at a greater level of intensity than this alternative. In that manner, cumulative effects from this alternative would have already been anticipated in the Mission Valley CPU Program EIR. Like the project, this alternative would not result in cumulative impacts beyond those already addressed in the CPU Program EIR. Unlike the project, the air quality impacts (operational) of the project would not be cumulatively considerable. This alternative would have a lower intensity than buildout of the site anticipated in the Mission Valley CPU Program EIR; therefore this alternative would not result in additional cumulative impacts.

10.5.3.2 Evaluation of Alternative

The Reduced Development Intensity/Operational Air Quality Impact Avoidance and Minimized Historical/Tribal Cultural Resources Impacts alternative would result in avoidance of cumulatively significant air quality impacts associated with operational (vehicular) emissions and would lessen impacts relative to historic resources and tribal cultural resources. The intensity of development under this alternative would be reduced to a level where operational air quality emissions standards are not exceeded, and development in areas of three significant cultural sites would be eliminated.

Like the project, the Reduced Development Intensity/Operational Air Quality Impact Avoidance and Minimized Historical/Tribal Cultural Resources Impacts alternative has the potential to result in land use compatibility conflicts due to locating sensitive receptors (i.e., residential development) proximate to the I-8 freeway) and would be subject to Policy R-18 of the Riverwalk Specific Plan prohibiting residential balconies fronting I-8 to occur where exterior noise levels exceed 70 dBA CNEL, which would preclude a land use incompatibility with regards to exterior noise levels.

Grading required under this alternative for Fashion Valley Road would not change from that proposed for the project; impacts to biological resources would not change from those associated with the project. Appropriate mitigation measures would be required as with the project. Additionally, grading for areas where development occurs under this alternative would have the potential to result in significant indirect noise impacts to sensitive biological resources, as would the project. However, due to a reduction in development areas, those impacts would be less.

Relative to health and safety, the same potential for health risks associated with contaminated soils would occur under this alternative as would with the project, and the same mitigation measures would be required to ensure that impacts are reduced to below a level of significance. Like the project, this alternative would not result in impacts associated with energy, GHG emissions, geologic conditions, hydrology, water quality, and public utilities.

With regards to public services and facilities, development intensity under the Reduced Development Intensity – Operational Air Quality Impact Avoidance and Minimized Historical/Tribal Cultural Resources Impacts alternative would contribute less impacts to schools, parks, and libraries. But, like the project, this alternative would not result in significant impacts to the public services and facilities.

The Reduced Development Intensity – Operational Air Quality Impact Avoidance and Minimized Historical/Tribal Cultural Resources Impacts alternative would meet the following project objectives:

- Create a focused long-range plan intended to promote increased residential density and employment opportunities consistent with the General Plan, Mission Valley Community Plan, San Diego River Park Master Plan, and the Climate Action Plan.
- Design a neighborhood that integrates the San Diego River through active and passive park uses, trails, resource-based and a connected open space.
- Allow for the establishment and creation of a habitat Mitigation Bank that provides long-term habitat conservation and maintenance.
- Improve the Fashion Valley Road crossing that:
 - Provides expanded storm water flow volume accommodating a 10- to 15-year storm even;
 - Improves emergency response times by facilitating north-south vehicular access in storm events; and
 - Expands active transportation circulation by providing sidewalks and a buffered two-way cycle track.
 - Modernizes flood control gate operations in the project vicinity.
- Celebrate and interpret important cultural and historic resources within the Specific Plan area.

This alternative would meet other project objectives but at a substantially reduced level, as summarized below.

- Assist the City's housing supply needs by providing a range of housing, including both market rate and deed-restricted affordable units, proximate to transit, jobs, amenities, and services.
- Create a transit-accessible mixed-use development in a central, in-fill location.

This alternative would result in a 48 percent reduction in housing, substantially reducing the amount of much needed housing (market-rate and affordable) and the amount of housing immediately proximate and access to transit that could occur with the project. Further, development on lots immediately adjacent to the trolley stop would not occur, eliminating the mixed-use density proposed around the transit station.

- Implement the City of Villages goals and smart growth principles by creating a mixed-use neighborhood with housing, commercial, employment, and recreation opportunities along transit while restoring a key stretch of the San Diego River.

In addition to the much reduced residential development that would occur with this alternative, this alternative would also result in 18 percent less commercial retail and office and non-commercial retail uses and, thus, would not implement the City of Villages goals and smart growth principles to the extent the that project would.

- Promote multi-modal travel (pedestrian and bicycle friendly corridors) through the project site through on-site trails, paths, and sidewalks that connect to internal and adjacent amenities and services throughout Mission Valley.

While multi-modal travel could occur under this alternative, development intensity would be reduced, would occur in a disconnected and less efficient manner, and would not promote multi-modal accessibility to the extent of the project.

- Construct a new Green Line Trolley stop easily accessible from within Riverwalk and to adjacent surrounding residential and employment areas.

Because less development intensity would occur under this alternative, particularly immediately adjacent to the transit stop, the potential transit ridership and use of a new transit stop would be reduced.

10.6 Environmentally Superior Alternative

The environmental analysis of alternatives presented above is summarized in Table 10-3, *Comparison of Alternatives to Project*. CEQA requires that the EIR identify the environmentally superior alternative among all of the alternatives considered, including the project. If the No Project alternative is selected as environmentally superior, then the EIR shall also identify an environmentally superior alternative among the other alternatives. Based on the comparison of the overall environmental impacts for the described alternatives, the No Project/No Build alternative is identified as the environmentally superior alternative. The No Project/No Build alternative would not result in any of the environmental effects associated with the project and would avoid all significant impacts. The No Project/No Build alternative would not meet any objectives of the project.

Of the remaining alternatives, the Environmentally Superior Alternative is the Reduced Development Intensity – Operational Air Quality Impact Avoidance and Minimized Historical/Tribal Cultural

Resources Impacts alternative as it could reduce or avoid the significant environmental effects associated with the project. More specifically, cumulatively significant operational air quality impacts and reduced impacts to historical resources and tribal cultural resources when compared to the project while meeting the project objectives, but to a lesser extent as compared to the project.

Table 10-3. Comparison of Alternatives to Project

Environmental Issue Area	Project	Alternative 1 No Project/No Build	Alternative 2 Reduced Intensity Development – Operational Air Quality Impact Avoidance	Alternative 3 Reduced Intensity Development – Operational Air Quality Impact Avoidance and Minimized Historical/Tribal Cultural Resources Impacts
Land Use	Less than significant impact to plans and policies. Secondary impacts relative to increased noise levels during construction on sensitive biological resources.	Greater level of impact than project. Would not implement goals and policies of the San Diego River Park Master Plan. Would not provide for improvements to Fashion Valley Road as envisioned in the Mission Valley Community Plan. Would not fulfill the long-standing long-range planning goals for the community, the City, and the region.	Same as project (i.e., less than significant).	Same as project (i.e., less than significant).
Transportation and Circulation	Less than significant impact.	No new development; therefore, no impacts.	Same as project (i.e., less than significant).	Same as project (i.e., less than significant).
Visual Effects and Neighborhood Character	Less than significant impact.	No new development; therefore, no impacts.	Same as project (i.e., less than significant).	Same as project (i.e., less than significant).
Biological Resources	Significant direct impacts on wetland/riparian vegetation communities. Significant indirect impacts on sensitive avian species due to increased noise levels during construction.	No new development; therefore, no impacts. Would not improve the ecology of the San Diego River.	Same as project. Would require same mitigation.	Same as project. Would require same mitigation.

10.0 PROJECT ALTERNATIVES

Environmental Issue Area	Project	Alternative 1 No Project/No Build	Alternative 2 Reduced Intensity Development – Operational Air Quality Impact Avoidance	Alternative 3 Reduced Intensity Development – Operational Air Quality Impact Avoidance and Minimized Historical/Tribal Cultural Resources Impacts
Air Quality	Cumulatively significant operational impacts.	No new development; therefore, no impacts.	Lesser level of impact than project. Would avoid cumulatively significant operational impacts.	Lesser level of impact than project. Would avoid cumulatively significant operational impacts.
Historical Resources	Potential to impacts subsurface cultural resources.	No new development; therefore, no impacts.	Same as project. Would require same mitigation.	Lesser level of impact than project. Would avoid impacts to three potentially significant archaeological sites. Would require same mitigation for potential impacts.
Energy	Less than significant impact.	Same as project (i.e., less than significant).	Same as project (i.e., less than significant).	Same as project (i.e., less than significant).
Noise	Significant temporary noise impacts to sensitive avian species during construction. Significant increase in ambient noise levels due to HVAC units, depending on location. Significant impact due to performances at Riverwalk River Park amphitheater.	No new development; therefore, no impacts.	Same as project. Would require same mitigation.	Same as project. Would require same mitigation.
Greenhouse Gas Emissions	Less than significant impact.	No new development; therefore, no impacts.	Same as project (i.e., less than significant).	Same as project (i.e., less than significant).

10.0 PROJECT ALTERNATIVES

Environmental Issue Area	Project	Alternative 1 No Project/No Build	Alternative 2 Reduced Intensity Development – Operational Air Quality Impact Avoidance	Alternative 3 Reduced Intensity Development – Operational Air Quality Impact Avoidance and Minimized Historical/Tribal Cultural Resources Impacts
Tribal Cultural Resources	Potential to impacts subsurface cultural resources.	No new development; therefore, no impacts.	Same as project. Would require same mitigation.	Lesser level of impact than project. Would avoid impacts to three potentially significant archaeological sites. Would require same mitigation for potential impacts.
Geologic Conditions	Less than significant impact.	No new development; therefore, no impacts.	Same as project (i.e., less than significant).	Same as project (i.e., less than significant).
Hydrology	Less than significant impact.	No new development; therefore, no impacts. However, would not result in any improvements to hydrologic conditions, including flooding during major storm events.	Same as project (i.e., less than significant).	Same as project (i.e., less than significant). Would result in less impervious area than project.
Public Utilities	Less than significant impact.	No new development; therefore, no impacts.	Same as project (i.e., less than significant).	Same as project (i.e., less than significant).
Water Quality	Less than significant impact.	No new development; therefore, no impacts.	Same as project (i.e., less than significant).	Same as project (i.e., less than significant).
Public Services and Facilities	Less than significant impact.	No new development; therefore, no impacts.	Same as project (i.e., less than significant).	Same as project (i.e., less than significant).
Health and Safety	Potential for the presence of arsenic and organochlorine pesticides in soils within the project site. Potential for exposure to COCs due to former agricultural uses on the project site.	No new development; therefore, no impacts. However, would not result in any improvements to hydrologic conditions, including flooding during major storm events. Therefore, no improvement to emergency response times.	Same as project. Would require same mitigation.	Same as project (i.e., less than significant).

10.0 PROJECT ALTERNATIVES

Environmental Issue Area	Project	Alternative 1 No Project/No Build	Alternative 2 Reduced Intensity Development – Operational Air Quality Impact Avoidance	Alternative 3 Reduced Intensity Development – Operational Air Quality Impact Avoidance and Minimized Historical/Tribal Cultural Resources Impacts
Cumulative Effects	Cumulative impacts evaluated for build-out of the Mission Valley Community Plan as part of the Mission Valley CPU Program EIR. No significant unmitigated cumulative impacts, except impacts associated with air quality.	No new development; therefore, no impacts.	No new impacts. Lesser level of impact than project. Would avoid cumulatively significant operational air emissions.	No new impacts. Lesser level of impact than project. Would avoid cumulatively significant operational air emissions.



Figure 10-1. General Areas of Development Under the Reduced Development Intensity – Operational Air Quality Impact Avoidance and Minimized Historical/Tribal Cultural Resources Impacts Alternative

11.0 MITIGATION MONITORING AND REPORTING PROGRAM

CEQA, Section 21081.6, requires that a mitigation monitoring and reporting program (MMRP) be adopted upon certification of an EIR to ensure that the mitigation measures are implemented. The mitigation monitoring and reporting program specifies what the mitigation is, the entity responsible for monitoring the program, and when in the process it should be accomplished.

The EIR, incorporated herein as referenced, focuses on issues determined to be potentially significant by the City of San Diego. The issues addressed in the EIR include land use, transportation/circulation, visual effects and neighborhood character, biological resources, air quality, historical resources, energy, noise, greenhouse gas emissions, tribal cultural resources, geologic conditions, hydrology, public utilities, water quality, public services and facilities, and health and safety.

PRC section 21081.6 requires the monitoring of measures proposed to mitigate significant environmental effects. Issues related to biological resources, historical resources, noise, and tribal cultural resources, were determined to be potentially significant and require mitigation as described in this EIR. All impacts associated with these issue areas would be fully mitigated to below a level of significance with implementation of mitigation measures. Cumulative air quality impacts would remain significant and unmitigable.

The Mitigation Monitoring and Reporting Program (MMRP) for the project is under the jurisdiction of San Diego and other agencies as specified below. The MMRP for the project addresses only the issue areas identified above as potentially significant. The following is an overview of the mitigation monitoring and reporting program to be completed for the project.

11.1 Monitoring Activities

Monitoring activities would be accomplished by individuals identified in the *Document Submittal/ Inspection Checklist* table, below. Specific consultant qualifications will be determined by the City of San Diego.

11.2 Mitigation Measures

GENERAL REQUIREMENTS – PART I Plan Check Phase (prior to permit issuance)

1. Prior to the issuance of a Notice To Proceed (NTP) for a subdivision, or any construction permits, such as Demolition, Grading or Building, or beginning any construction related activity on-site, the Development Services Department (DSD)

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Director's Environmental Designee (ED) shall review and approve all Construction Documents (CD), (plans, specification, details, etc.) to ensure the MMRP requirements are incorporated into the design.

2. In addition, the ED shall verify that the MMRP Conditions/Notes that apply ONLY to the construction phases of this project are included VERBATIM, under the heading, **"ENVIRONMENTAL/MITIGATION REQUIREMENTS."**
3. These notes must be shown within the first three (3) sheets of the construction documents in the format specified for engineering construction document templates as shown on the City website:

<http://www.sandiego.gov/development-services/industry/standtemp.shtml>
4. The **TITLE INDEX SHEET** must also show on which pages the "Environmental/Mitigation Requirements" notes are provided.
5. **SURETY AND COST RECOVERY** – The Development Services Director or City Manager may require appropriate surety instruments or bonds from private Permit Holders to ensure the long-term performance or implementation of required mitigation measures or programs. The City is authorized to recover its cost to offset the salary, overhead, and expenses for City personnel and programs to monitor qualifying projects.

B. GENERAL REQUIREMENTS – PART II Post Plan Check (After permit issuance/Prior to start of construction)

1. **PRE-CONSTRUCTION MEETING IS REQUIRED TEN (10) WORKING DAYS PRIOR TO BEGINNING ANY WORK ON THIS PROJECT.** The PERMIT HOLDER/OWNER is responsible to arrange and perform this meeting by contacting the CITY RESIDENT ENGINEER (RE) of the Field Engineering Division and City staff from the MITIGATION MONITORING COORDINATOR (MMC). Attendees must also include the Permit Holder's Representative(s), Job Site Superintendent and the following consultants:
Qualified Acoustician, Archaeologist(s), Native American Monitor(s), and Biologist(s)

Note: Failure of all responsible Permit Holder's representatives and consultants to attend shall require an additional meeting with all parties present.

CONTACT INFORMATION:

- a) The PRIMARY POINT OF CONTACT is the **RE** at the **Field Engineering Division – 858-627-3200**

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b) For Clarification of ENVIRONMENTAL REQUIREMENTS, applicant is also required to call **RE and MMC at 858-627-3360**.

2. **MMRP COMPLIANCE:** This Project, Project Tracking System (PTS) Number 581984 and/or Environmental Document Number 581984, shall conform to the mitigation requirements contained in the associated Environmental Document and implemented to the satisfaction of the DSD's Environmental Designee (MMC) and the City Engineer (RE). The requirements may not be reduced or changed but may be annotated (i.e., to explain when and how compliance is being met and location of verifying proof, etc.). Additional clarifying information may also be added to other relevant plan sheets and/or specifications as appropriate (i.e., specific locations, times of monitoring, methodology, etc.).

Note: Permit Holder's Representatives must alert RE and MMC if there are any discrepancies in the plans or notes, or any changes due to field conditions. All conflicts must be approved by RE and MMC BEFORE the work is performed.

3. **OTHER AGENCY REQUIREMENTS:** Evidence of compliance with all other agency requirements or permits shall be submitted to the RE and MMC for review and acceptance prior to the beginning of work or within one week of the Permit Holder obtaining documentation of those permits or requirements. Evidence shall include copies of permits, letters of resolution or other documentation issued by the responsible agency:
- *California Department of Fish and Wildlife: California Fish and Game Code Section 1602 Streambed Alteration Agreement*
 - *Federal Emergency Management Agency: Conditional Letter of Map Revision*
 - *Regional Water Quality Control Board: National Pollutant Discharge Elimination System General Construction Permit, Clean Water Act Section 401 Waiver/ Certification*
 - *U.S. Army Corps of Engineers: Clean Water Act Section 404 Authorization*
 - *PUC Approval of the Formal Application*
4. **MONITORING EXHIBITS:** All consultants are required to submit, to RE and MMC, a monitoring exhibit on a 11"x17" reduction of the appropriate construction plan, such as site plan, grading, landscape, etc., marked to clearly show the specific areas including the **LIMIT OF WORK**, scope of that discipline's work, and notes indicating when in the construction schedule that work will be performed. When necessary for clarification, a detailed methodology of how the work will be performed shall be included.

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Note: Surety and Cost Recovery – When deemed necessary by the Development Services Director or City Manager, additional surety instruments or bonds from the private Permit Holder may be required to ensure the long-term performance or implementation of required mitigation measures or programs. The City is authorized to recover its cost to offset the salary, overhead, and expenses for City personnel and programs to monitor qualifying projects.

5. **OTHER SUBMITTALS AND INSPECTIONS:** The Permit Holder/Owner's representative shall submit all required documentation, verification letters, and requests for all associated inspections to the RE and MMC for approval per the following schedule:

DOCUMENT SUBMITTAL/INSPECTION CHECKLIST		
Issue Area	Document Submittal	Associated Inspection/Approvals/Notes
General	Consultant Qualification Letters	Prior to Preconstruction Meeting
General	Consultant Construction Monitoring Exhibits	Prior to or at Preconstruction Meeting
Land Use (MSCP)	Land Use Adjacency Issues CVSRs	Land Use Adjacency Issue Site Observations
Biology	Biologist Limit of Work Verification	Limit of Work Inspection
Biology	Biology Reports	Biology/Habitat Restoration Inspection
Paleontology	Paleontology Reports	Paleontology Site Observation
Archaeology	ADRP Reports and Archaeology Reports	ADRP/Archaeology/Historic Site Observation
Noise	Acoustical Reports	Noise Mitigation Features Inspection
Traffic	Traffic Reports	Traffic Features Site Observation
Tribal Cultural Resources	Native Plant Palette, Interpretative Signage Plan, Street Sign Plan, ADRP Reports, and Archaeology Reports	Native Plant Palette, Interpretative Signage Plan, Street Sign Plan, ADRP Reports, and Archaeology Reports
Waste Management	Waste Management Reports	Waste Management Inspections
Bond Release	Request for Bond Release Letter	Final MMRP Inspections Prior to Bond Release Letter

C. SPECIFIC MMRP ISSUE AREA CONDITIONS/REQUIREMENTS

Biological Resources

MM 5.4-1: Biological Resources (Protection During Construction)

Prior to issuance of any construction permits, including but not limited to, the first Grading Permit, Demolition Plans/Permits and Building Plans/Permits, or beginning any construction-related activity on-site, but prior to the first preconstruction, for lots south of the MTS Trolley Tracks (Lots 32-40, 43-

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52, TT, UU, VV, WW, XX, YY, ZZ, AAA, BBB, CCC, DDD, or EEE as shown on VTM 2213361) the Development Services Department (DSD) Environmental Designee (ED) shall review and approve all construction documents (plans, specifications, details, etc.) to ensure the MMRP requirements are incorporated.

I. Prior to Construction

- A. **Biologist Verification:** The owner/permittee shall provide a letter to the City's Mitigation Monitoring Coordination (MMC) section stating that a Project Biologist (Qualified Biologist) as defined in the City of San Diego's Biological Guidelines (2018), has been retained to implement the project's biological monitoring program. The letter shall include the names and contact information of all persons involved in the biological monitoring of the project.
- B. **Preconstruction Meeting:** The Qualified Biologist shall attend the preconstruction meeting, discuss the project's biological monitoring program, and arrange to perform any follow up mitigation measures and reporting including site-specific monitoring, restoration or revegetation, and additional fauna/flora surveys/salvage.
- C. **Biological Documents:** The Qualified Biologist shall submit all required documentation to MMC verifying that any special mitigation reports including but not limited to, maps, plans, surveys, survey timelines, or buffers are completed or scheduled per City Biology Guidelines, Multiple Species Conservation Program (MSCP), Environmentally Sensitive Lands Ordinance (ESL), project permit conditions; California Environmental Quality Act (CEQA); endangered species acts (ESAs); and/or other local, state or federal requirements.
- D. **BCME:** The Qualified Biologist shall present a Biological Construction Mitigation/Monitoring Exhibit (BCME) which includes the biological documents in C above. In addition, include: restoration/revegetation plans, plant salvage/relocation requirements (e.g., coastal cactus wren plant salvage, burrowing owl exclusions, etc.), avian or other wildlife surveys/survey schedules (including general avian nesting and USFWS protocol), timing of surveys, wetland buffers, avian construction avoidance areas/noise buffers/ barriers, other impact avoidance areas, and any subsequent requirements determined by the Qualified Biologist and the City ADD/MMC. The BCME shall include a site plan, written and graphic depiction of the project's biological mitigation/monitoring program, and a schedule. The BCME shall be approved by MMC and referenced in the construction documents.
- E. **Avian Protection Requirements:** To avoid any direct impacts to the Clark's marsh wren, Cooper's hawk, double-crested cormorant, yellow warbler, yellow breasted chat, western bluebird, least Bell's vireo, southwestern willow flycatcher, and the light-footed Ridgway's rail, 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

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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 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 pre-construction survey to City DSD for review and approval prior to initiating any construction activities. If nesting Clark's marsh wren, Cooper's hawk, double-crested cormorant, yellow warbler, yellow breasted chat, western bluebird, least Bell's vireo, southwestern willow flycatcher, and the light-footed Ridgway's rail 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 for review and approval and implemented to the satisfaction of the City. The City's MMC Section 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.

- F. **Resource Delineation:** Prior to construction activities, the Qualified Biologist shall supervise the placement of orange construction fencing or equivalent along the limits of disturbance adjacent to sensitive biological habitats and verify compliance with any other project conditions as shown on the BCME. This phase shall include flagging plant specimens and delimiting buffers to protect sensitive biological resources (e.g., habitats/flora & fauna species, including nesting birds) during construction. Appropriate steps/care should be taken to minimize attraction of nest predators to the site.
- G. **Education:** Prior to commencement of construction activities, the Qualified Biologist shall meet with the owner/permittee or designee and the construction crew and conduct an on-site educational session regarding the need to avoid impacts outside of the approved construction area and to protect sensitive flora and fauna (e.g., explain the avian and wetland buffers, flag system for removal of invasive species or retention of sensitive plants, and clarify acceptable access routes/methods and staging areas, etc.).

II. During Construction

- A. **Monitoring:** All construction (including access/staging areas) shall be restricted to areas previously identified, proposed for development/staging, or previously disturbed as shown on "Exhibit A" and/or the BCME. The Qualified Biologist shall monitor construction activities as needed to ensure that construction activities do not encroach into biologically sensitive areas, or cause other similar damage, and that the work plan has been amended to accommodate any sensitive species located during the pre-construction surveys. In addition, the Qualified Biologist shall document field activity via the Consultant Site Visit Record (CSVR). The CSVR shall be e-mailed to MMC on the 1st day of monitoring, the 1st

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week of each month, the last day of monitoring, and immediately in the case of any undocumented condition or discovery.

- B. **Subsequent Resource Identification:** The Qualified Biologist shall note/act to prevent any new disturbances to habitat, flora, and/or fauna onsite (e.g., flag plant specimens for avoidance during access, etc). If active nests of the Clark's marsh wren, Cooper's hawk, double-crested cormorant, yellow warbler, yellow breasted chat, western bluebird, least Bell's vireo, southwestern willow flycatcher, and the light-footed Ridgway's rail or other previously unknown sensitive resources are detected, all project activities that directly impact the resource shall be delayed until species specific local, state or federal regulations have been determined and applied by the Qualified Biologist.

III. Post Construction Measures

- A. In the event that impacts exceed previously allowed amounts, additional impacts shall be mitigated in accordance with City Biology Guidelines, ESL and MSCP, State CEQA, and other applicable local, state and federal law. The Qualified Biologist shall submit a final BCME/report to the satisfaction of the City ADD/MMC within 30 days of construction completion.

MM 5.4-2: Biological Resources Wetlands

Prior to issuance of 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 for public improvements or impacts associated with the construction of Fashion Valley Road between Riverwalk Drive and Hotel Circle North., the Owner/Permittee shall mitigate for City wetland/riparian vegetation impacts to 0.64-acre (0.01 acre of coastal and valley freshwater marsh, 0.57 acre of southern cottonwood-willow riparian forest) and 0.06-acre of open water. Mitigation for impacts to City jurisdictional wetlands shall occur at a 3:1 mitigation-to-impact ratio in accordance with Table 2a of the City's Biology Guidelines. Accordingly, mitigation for City wetland/riparian impacts shall include a 1:1 creation component to ensure no net loss of wetlands and a 2:1 restoration/enhancement component. The Owner/Permittee shall provide 1.92 acres of habitat and shall be achieved on-site via the following, as detailed in the *Riverwalk Project Wetland Mitigation Plan* (Alden Environmental, Inc. February 19, 2020):

- Creation of 0.21-acre of freshwater marsh riparian and 0.57-acre of southern cottonwood-willow riparian forest
- Enhancement of 1.14-acres of southern cottonwood-willow riparian forest

Biological Resources Other Resources Agency Permits

Prior to issuance of 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 for public improvements or impacts associated with the construction of Fashion Valley Road

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between Riverwalk Drive and Hotel Circle North, the Owner/Permittee shall provide evidence of the following permits: a 404 permit from U.S. Army Corps of Engineers, 401 Certification from Regional Water Quality Control Board, and a 1602 streambed alteration agreement from the California Department of Fish and Wildlife. Evidence shall include copies of permit(s) issued, letter of resolution(s) by the responsible agency documenting compliance, or other evidence documenting compliance deemed acceptable by MSCP, DSD, and MMC.

MM 5.4-3: Biological Resources (Revegetation Plan)

Prior to issuance of 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 for public improvements or impacts associated with the construction of Fashion Valley Road between Riverwalk Drive and Hotel Circle North, the Assistant Deputy Director (ADD) environmental designee of the City's Land Development Review Division (LDR) shall verify that the following statements are shown verbatim on the grading and/or construction plans as a note under the heading *Environmental Requirements*: "Riverwalk Specific Plan" is subject to Mitigation, Monitoring and Reporting Program and shall conform to the mitigation conditions as contained in the "Environmental Impact Report PTS. No. 581984 / SCH No. 2018041028."

Prior to Permit Issuance

- A. Land Development Review (LDR) Plan Check
 - 1. Prior to issuance for any construction permits, including but not limited to, the first Grading Permit, Demolition Plans/Permits and Building Plans/Permits, whichever is applicable, the ADD environmental designee shall verify that the requirements for the revegetation/restoration plans and specifications, including mitigation of direct impacts to City wetland/riparian vegetation impacts to 0.64-acre (0.01 acre of coastal and valley freshwater marsh, 0.57 acre of southern cottonwood-willow riparian forest) and 0.06-acre of open water, and the remaining restoration revegetation onsite subjected to MSCP B15 requirements shall be shown and noted on the appropriate landscape construction documents. The landscape construction documents and specifications must be found to be in conformance with the *Habitat Restoration Plan*, prepared by Alden Environmental, Inc., February 19, 2020, the requirements of which are summarized below:
- B. Revegetation/Restoration Plan(s) and Specifications
 - 1. Landscape Construction Documents (LCD) shall be prepared on D-sheets and submitted to the City of San Diego Development Services Department, Landscape Architecture Section (LAS) for review and approval. LAS shall consult with Mitigation Monitoring Coordination (MMC) and obtain concurrence prior to approval of LCD. The LCD shall consist of revegetation/restoration, planting, irrigation and erosion control plans; including all required graphics, notes, details, specifications, letters, and reports as outlined below.

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2. Landscape Revegetation/Restoration Planting and Irrigation Plans shall be prepared in accordance with the San Diego Land Development Code (LDC) Chapter 14, Article 2, Division 4, the LDC Landscape Standards submittal requirements, and Attachment "B" (General Outline for Revegetation/Restoration Plans) of the City of San Diego's LDC Biology Guidelines (2018). The Principal Qualified Biologist (PQB) shall identify and adequately document all pertinent information concerning the revegetation/restoration goals and requirements, such as but not limited to, plant/seed palettes, timing of installation, plant installation specifications, method of watering, protection of adjacent habitat, erosion and sediment control, performance/success criteria, inspection schedule by City staff, document submittals, reporting schedule, etc. The LCD shall also include comprehensive graphics and notes addressing the ongoing maintenance requirements (after final acceptance by the City).
3. The Revegetation Installation Contractor (RIC), Revegetation Maintenance Contractor (RMC), Construction Manager (CM) and Grading Contractor (GC), where applicable shall be responsible to insure that for all grading and contouring, clearing and grubbing, installation of plant materials, and any necessary maintenance activities or remedial actions required during installation and the 120-day plant establishment period are done per approved LCD. The following procedures at a minimum, but not limited to, shall be performed:
 - a. The RMC shall be responsible for the maintenance of the wetland/riparian mitigation area for a minimum period of 120-days. Maintenance visits shall be conducted on a weekly basis throughout the plant establishment period.
 - b. At the end of the 120-day period the PQB shall review the mitigation area to assess the completion of the short-term plant establishment period and submit a report for approval by MMC.
 - c. MMC will provide approval in writing to begin the five-year long-term establishment/maintenance and monitoring program.
 - d. Existing indigenous/native species shall not be pruned, thinned or cleared in the revegetation/mitigation area.
 - e. The revegetation site shall not be fertilized.
 - f. The RIC is responsible for reseeding (if applicable) if weeds are not removed, within one week of written recommendation by the PQB.
 - g. Weed control measures shall include the following: (1) hand removal, (2) cutting, with power equipment, and (3) chemical control. Hand removal of weeds is the most desirable method of control and will be used wherever possible.
 - h. Damaged areas shall be repaired immediately by the RIC/RMC. Insect infestations, plant diseases, herbivory, and other pest problems will be closely monitored throughout the five-year maintenance period. Protective mechanisms such as metal wire netting shall be used as necessary. Diseased and infected plants shall be immediately disposed of off-site in a legally acceptable manner at the discretion of the PQB or Qualified Biological Monitor (QBM) (City

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approved). Where possible, biological controls will be used instead of pesticides and herbicides.

4. If a Brush Management Program is required the revegetation/restoration plan shall show the dimensions of each brush management zone and notes shall be provided describing the restrictions on planting and maintenance and identify that the area is impact neutral and shall not be used for habitat mitigation/credit purposes.
- C. Letters of Qualification Have Been Submitted to ADD
1. The applicant shall submit, for approval, a letter verifying the qualifications of the biological professional to MMC. This letter shall identify the PQB, Principal Restoration Specialist (PRS), and QBM, where applicable, and the names of all other persons involved in the implementation of the revegetation/restoration plan and biological monitoring program, as they are defined in the City of San Diego Biological Review References. Resumes and the biology worksheet should be updated annually.
 2. MMC will provide a letter to the applicant confirming the qualifications of the PQB/PRS/QBM and all City Approved persons involved in the revegetation/restoration plan and biological 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 revegetation/restoration plan and biological monitoring of the project.
 4. PBQ must also submit evidence to MMC that the PQB/QBM has completed Storm Water Pollution Prevention Program (SWPPP) training.

Prior to Start of Construction

- A. PQB/PRS Shall Attend Preconstruction (Precon) Meetings
1. Prior to beginning any work that requires monitoring:
 - a. The owner/permittee or their authorized representative shall arrange and perform a Precon Meeting that shall include the PQB or PRS, Construction Manager (CM) and/or Grading Contractor (GC), Landscape Architect (LA), Revegetation Installation Contractor (RIC), Revegetation Maintenance Contractor (RMC), Resident Engineer (RE), Building Inspector (BI), if appropriate, and MMC.
 - b. The PQB shall also attend any other grading/excavation related Precon Meetings to make comments and/or suggestions concerning the revegetation/restoration plan(s) and specifications with the RIC, CM and/or GC.
 - c. If the PQB is unable to attend the Precon Meeting, the owner shall schedule a focused Precon Meeting with MMC, PQB/PRS, CM, BI, LA, RIC, RMC, RE and/or BI, if appropriate, prior to the start of any work associated with the revegetation/restoration phase of the project, including site grading preparation.
 2. Where Revegetation/Restoration Work Will Occur
 - a. Prior to the start of any work, the PQB/PRS shall also submit a revegetation/restoration monitoring exhibit (RRME) based on the appropriate

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- reduced LCD (reduced to 11"x 17" format) to MMC, and the RE, identifying the areas to be revegetated/restored including the delineation of the limits of any disturbance/grading and any excavation.
- b. PQB shall coordinate with the construction superintendent to identify appropriate Best Management Practices (BMP) on the RRME.
 3. When Biological Monitoring Will Occur
 - a. Prior to the start of any work, the PQB/PRS shall also submit a monitoring procedures schedule to MMC and the RE indicating when and where biological monitoring and related activities will occur.
 4. PQB Shall Contact MMC to Request Modification
 - a. The PQB may submit a detailed letter to MMC prior to the start of work or during construction requesting a modification to the revegetation/restoration plans and specifications. This request shall be based on relevant information (such as other sensitive species not listed by federal and/or state agencies and/or not covered by the MSCP and to which any impacts may be considered significant under CEQA) which may reduce or increase the potential for biological resources to be present.

During Construction

- A. PQB or QBM Present During Construction/Grading/Planting
 1. The PQB or QBM shall be present full-time during construction activities including but not limited to, site preparation, cleaning, grading, excavation, landscape establishment in association with demolition and construction of Fashion Valley Road improvements which would result in impacts to sensitive biological resources as identified in the LCD and on the RRME. **The RIC and/or QBM are responsible for notifying the PQB/PRS of changes to any approved construction plans, procedures, and/or activities. The PQB/PRS is responsible to notify the CM, LA, RE, BI and MMC of the changes.**
 2. The PQB or QBM shall document field activity via the Consultant Site Visit Record Forms (CSVr). The CSVr's shall be faxed by the CM the first day of monitoring, the last day of monitoring, monthly, and in the event that there is a deviation from conditions identified within the LCD and/or biological monitoring program. The RE shall forward copies to MMC.
 3. The PQB or QBM shall be responsible for maintaining and submitting the CSVr at the time that CM responsibilities end (i.e., upon the completion of construction activity other than that of associated with biology).
 4. All construction activities (including staging areas) shall be restricted to the development areas as shown on the LCD. The PQB/PRS or QBM staff shall monitor construction activities as needed, with MMC concurrence on method and schedule. This is to ensure that construction activities do not encroach into biologically sensitive areas beyond the limits of disturbance as shown on the approved LCD.

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5. The PQB or QBM shall supervise the placement of orange construction fencing or City approved equivalent, along the limits of potential disturbance adjacent to (or at the edge of) all sensitive habitats including southern cottonwood-willow riparian forest, southern willow scrub, coastal and valley freshwater marsh, emergent wetland, and open water: Clark's marsh wren, Cooper's hawk, double-crested cormorant, yellow warbler, yellow breasted chat, western bluebird, least Bell's vireo, southwestern willow flycatcher, and the light-footed Ridgway's, as shown on the approved LCD.
 6. The PBQ shall provide a letter to MMC that limits of potential disturbance has been surveyed, staked and that the construction fencing is installed properly.
 7. The PQB or QBM shall oversee implementation of BMP, such as gravel bags, straw logs, silt fences or equivalent erosion control measures, as needed to ensure prevention of any significant sediment transport. In addition, the PQB/QBM shall be responsible to verify the removal of all temporary construction BMP upon completion of construction activities. Removal of temporary construction BMP shall be verified in writing on the final construction phase CSV.
 8. PQB shall verify in writing on the CSV's that no trash stockpiling or oil dumping, fueling of equipment, storage of hazardous wastes or construction equipment/material, parking or other construction related activities shall occur adjacent to sensitive habitat. These activities shall occur only within the designated staging area located outside the area defined as biological sensitive area.
 9. The long-term establishment inspection and reporting schedule per LCD must all be approved by MMC prior to the issuance of the Notice of Completion (NOC) or any bond release.
- B. Disturbance/Discovery Notification Process
1. If unauthorized disturbances occur or sensitive biological resources are discovered that were not previously identified on the LCD and/or RRME, the PQB or QBM shall direct the contractor to temporarily divert construction in the area of disturbance or discovery and immediately notify the RE or BI, as appropriate.
 2. The PQB shall also immediately notify MMC by telephone of the disturbance and report the nature and extent of the disturbance and recommend the method of additional protection, such as fencing and appropriate Best Management Practices (BMP). After obtaining concurrence with MMC and the RE, PQB and CM shall install the approved protection and agreement on BMP.
 3. The PQB shall also submit written documentation of the disturbance to MMC within 24 hours by fax or email with photos of the resource in context (e.g., show adjacent vegetation).
- C. Determination of Significance
1. The PQB shall evaluate the significance of disturbance and/or discovered biological resource and provide a detailed analysis and recommendation in a letter report with the appropriate photo documentation to MMC to obtain concurrence and formulate a plan of action which can include fines, fees, and supplemental mitigation costs.

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2. MMC shall review this letter report and provide the RE with MMC's recommendations and procedures.

Post Construction

A. Mitigation Monitoring and Reporting Period

1. Five-Year Mitigation Establishment/Maintenance Period

- a. The RMC shall be retained to complete maintenance monitoring activities throughout the five-year mitigation monitoring period.
- b. Maintenance visits will be conducted twice per month for the first six months, once per month for the remainder of the first year, and quarterly thereafter.
- c. Maintenance activities will include all items described in the LCD.
- d. Plant replacement will be conducted as recommended by the PQB (note: plants shall be increased in container size relative to the time of initial installation or establishment or maintenance period may be extended to the satisfaction of MMC).

2. Five-Year Biological Monitoring

- a. All biological monitoring and reporting shall be conducted by a PQB or QBM, as appropriate, consistent with the LCD.
- b. Monitoring shall involve both qualitative horticultural monitoring and quantitative monitoring (i.e., performance/success criteria). Horticultural monitoring shall focus on soil conditions (e.g., moisture and fertility), container plant health, seed germination rates, presence of native and non-native (e.g., invasive exotic) species, any significant disease or pest problems, irrigation repair and scheduling, trash removal, illegal trespass, and any erosion problems.
- c. After plant installation is complete, qualitative monitoring surveys will occur monthly during year one and quarterly during years two through five.
- d. Upon the completion of the 120-days short-term plant establishment period, quantitative monitoring surveys shall be conducted at 0, 6, 12, 24, 36, 48 and 60 months by the PQB or QBM. The revegetation/restoration effort shall be quantitatively evaluated once per year (in spring) during years three through five, to determine compliance with the performance standards identified on the LCD. All plant material must have survived without supplemental irrigation for the last two years.
- e. Quantitative monitoring shall include the use of fixed transects and photo points to determine the vegetative cover within the revegetated habitat. Collection of fixed transect data within the revegetation/restoration site shall result in the calculation of percent cover for each plant species present, percent cover of target vegetation, tree height and diameter at breast height (if applicable) and percent cover of non-native/non-invasive vegetation. Container plants will also be counted to determine percent survivorship. The data will be used determine attainment of performance/success criteria identified within the LCD.

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- f. Biological monitoring requirements may be reduced if, before the end of the fifth year, the revegetation meets the fifth-year criteria and the irrigation has been terminated for a period of the last two years.
 - g. The PQB or QBM shall oversee implementation of post-construction BMP, such as gravel bags, straw logs, silt fences or equivalent erosion control measure, as needed to ensure prevention of any significant sediment transport. In addition, the PBQ/QBM shall be responsible to verify the removal of all temporary post-construction BMP upon completion of construction activities. Removal of temporary post-construction BMP shall be verified in writing on the final post-construction phase CSV.
- B. Submittal of Draft Monitoring Report
 - 1. A draft monitoring letter report shall be prepared to document the completion of the 120-day plant establishment period. The report shall include discussion on weed control, horticultural treatments (pruning, mulching, and disease control), erosion control, trash/debris removal, replacement planting/reseeding, site protection/signage, pest management, vandalism, and irrigation maintenance. The revegetation/restoration effort shall be visually assessed at the end of 120-day period to determine mortality of individuals.
 - 2. The PQB shall submit two copies of the Draft Monitoring Report which describes the results, analysis, and conclusions of all phases of the Biological Monitoring and Reporting Program (with appropriate graphics) to MMC for review and approval within 30 days following the completion of monitoring. Monitoring reports shall be prepared on an annual basis for a period of five years. Site progress reports shall be prepared by the PQB following each site visit and provided to the owner, RMC and RIC. Site progress reports shall review maintenance activities, qualitative and quantitative (when appropriate) monitoring results including progress of the revegetation relative to the performance/success criteria, and the need for any remedial measures.
 - 3. Draft annual reports (three copies) summarizing the results of each progress report including quantitative monitoring results and photographs taken from permanent viewpoints shall be submitted to MMC for review and approval within 30 days following the completion of monitoring.
 - 4. MMC shall return the Draft Monitoring Report to the PQB for revision or, for preparation of each report.
 - 5. The PQB shall submit revised Monitoring Report to MMC (with a copy to RE) for approval within 30 days.
 - 6. MMC will provide written acceptance of the PQB and RE of the approved report.
- C. Final Monitoring Reports(s)
 - 1. PQB shall prepare a Final Monitoring upon achievement of the fifth-year performance/success criteria and completion of the five-year maintenance period.

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- a. This report may occur before the end of the fifth year if the revegetation meets the fifth-year performance /success criteria and the irrigation has been terminated for a period of the last two years.
- b. The Final Monitoring report shall be submitted to MMC for evaluation of the success of the mitigation effort and final acceptance. A request for a pre-final inspection shall be submitted at this time, MMC will schedule after review of report.
- c. If at the end of the five years any of the revegetated area fails to meet the project's final success standards, the applicant must consult with MMC. This consultation shall take place to determine whether the revegetation effort is acceptable. The applicant understands that failure of any significant portion of the revegetation/restoration area may result in a requirement to replace or renegotiate that portion of the site and/or extend the monitoring and establishment/maintenance period until all success standards are met.

MM 5.4-4: Biological Resources – Least Bell's Vireo (State Endangered/Federally Protected)

1. Prior to issuance of any construction permits, including but not limited to, the first Grading Permit, Demolition Plans/Permits and Building Plans/Permits the City Manager (or appointed environmental designee) shall verify that the following project requirements regarding the least Bell's vireo are shown on the construction plans:

No clearing, grubbing, grading, or other construction activities shall occur between March 15 and September 15, the breeding season of the least Bell's vireo, until the following requirements have been met to the satisfaction of the City Manager:

- A. A qualified biologist (possessing a valid endangered species act section 10(a)(1)(a) recovery permit) shall survey those wetland areas that would be subject to construction noise levels exceeding 60 decibels [dBA] or to the ambient noise level if it already exceeds 60 dBA hourly average for the presence of the least bell's vireo. Surveys for this species shall be conducted pursuant to the protocol survey guidelines established by the U.S. Fish and Wildlife Service within the breeding season prior to the commencement of construction. If the least Bell's vireo is present, then the following conditions must be met:
 - I. Between March 15 and September 15, no clearing, grubbing, or grading of occupied least Bell's vireo habitat shall be permitted. Areas restricted from such activities shall be staked or fenced under the supervision of a qualified biologist; and
 - II. Between March 15 and September 15, no construction activities shall occur within any portion of the site where construction activities would result in noise levels exceeding 60 dBA or to the ambient noise level if it already exceeds 60 dBA hourly average at the edge of occupied least bell's vireo or habitat. An analysis showing that

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noise generated by construction activities would not exceed 60 dBA hourly average at the edge of occupied habitat must be completed by a qualified acoustician (possessing current noise engineer license or registration with monitoring noise level experience with listed animal species) and approved by the city manager at least two weeks prior to the commencement of construction activities. Prior to the commencement of any of construction activities during the breeding season, areas restricted from such activities shall be staked or fenced under the supervision of a qualified biologist; or

- III. At least two weeks prior to the commencement of construction activities, under the direction of a qualified acoustician, noise attenuation measures (e.g., berms, walls) shall be implemented to ensure that noise levels resulting from construction activities will not exceed 60 dBA or to the ambient noise level if it already exceeds 60 dBA hourly average at the edge of habitat occupied by the least Bell's vireo. Concurrent with the commencement of construction activities and the construction of necessary noise attenuation facilities, noise monitoring* shall be conducted at the edge of the occupied habitat area to ensure that noise levels do not exceed 60 dBA hourly average or to the ambient noise level if it already exceeds 60 dBA hourly average. If the noise attenuation techniques implemented are determined to be inadequate by the qualified acoustician or biologist, then the associated construction activities shall cease until such time that adequate noise attenuation is achieved or until the end of the breeding season (September 16).

* Construction noise monitoring shall continue to be monitored at least twice weekly on varying days, or more frequently depending on the construction activity, to verify that noise levels at the edge of occupied habitat are maintained below 60 dBA hourly average or to the ambient noise level if it already exceeds 60 dBA hourly average. If not, other measures shall be implemented in consultation with the biologist and the City Manager, as necessary, to reduce noise levels to below 60 dBA hourly average or to the ambient noise level if it already exceeds 60 dBA hourly average. Such measures may include, but are not limited to, limitations on the placement of construction equipment and the simultaneous use of equipment.

- B. If least Bell's vireo are not detected during the protocol survey, the qualified biologist shall submit substantial evidence to the City Manager and applicable resource agencies which demonstrates whether or not mitigation measures such as noise walls are necessary between March 15 and September 15 as follows:
 - I. If this evidence indicates the potential is high for least Bell's vireo to be present based on historical records or site conditions, then condition A.III shall be adhered to as specified above.
 - II. If this evidence concludes that no impacts to this species are anticipated, no mitigation measures would be necessary.

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MM 5.4-5: Biological Resources – Southwestern Willow Flycatcher (Federally Endangered)

1. Prior to issuance of any construction permits, including but not limited to, the first Grading Permit, Demolition Plans/Permits and Building Plans/Permits the City Manager (or appointed environmental designee) shall verify that the following project requirements regarding the southwestern willow flycatcher are shown on the construction plans: No clearing, grubbing, grading, or other construction activities shall occur between May 1 and September 1, the breeding season of the southwestern willow Flycatcher, until the following requirements have been met to the satisfaction of the City Manager:
 - A. A qualified biologist (possessing a valid endangered species act section 10(a)(1)(a) recovery permit) shall survey those wetland areas that would be subject to construction noise levels exceeding 60 decibels [dBA] hourly average or to the ambient noise level if it already exceeds 60 dBA hourly average for the presence of the southwestern willow flycatcher. Surveys for this species shall be conducted pursuant to the protocol survey guidelines established by the U.S. Fish and Wildlife Service within the breeding season prior to the commencement of any construction. If the southwestern willow flycatcher is present, then the following conditions must be met:
 - I. Between May 1 and September 1, no clearing, grubbing, or grading of occupied southwestern willow flycatcher habitat shall be permitted. Areas restricted from such activities shall be staked or fenced under the supervision of a qualified biologist; and
 - II. Between May 1 and September 1, no construction activities shall occur within any portion of the site where construction activities would result in noise levels exceeding 60 dBA hourly average at the edge of occupied southwestern Willow flycatcher habitat or to the ambient noise level if it already exceeds 60 dBA hourly average. An analysis showing that noise generated by construction activities would not exceed 60 dBA hourly average or to the ambient noise level if it already exceeds 60 dBA hourly average at the edge of occupied habitat must be completed by a qualified acoustician (possessing current noise engineer license or registration with monitoring noise level experience with listed animal species) and approved by the City Manager at least two weeks prior to the commencement of construction activities. Prior to the commencement of construction activities during the breeding season, areas restricted from such activities shall be staked or fenced under the supervision of a qualified biologist; or
 - III. At least two weeks prior to the commencement of construction activities, under the direction of a qualified acoustician, noise attenuation measures (e.g., berms, walls) shall be implemented to ensure that noise levels resulting from construction activities will not exceed 60 dBA hourly average or to the ambient noise level if it already exceeds 60 dBA hourly average at the edge of habitat occupied by the

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southwestern willow flycatcher. Concurrent with the commencement of construction activities and the construction of necessary noise attenuation facilities, noise monitoring* shall be conducted at the edge of the occupied habitat area to ensure that noise levels do not exceed 60 dBA hourly average or to the ambient noise level if it already exceeds 60 dBA hourly average. If the noise attenuation techniques implemented are determined to be inadequate by the qualified acoustician or biologist, then the associated construction activities shall cease until such time that adequate noise attenuation is achieved or until the end of the breeding season (September 1).

* Construction noise monitoring shall continue to be monitored at least twice weekly on varying days, or more frequently depending on the construction activity, to verify that noise levels at the edge of occupied habitat are maintained below 60 dBA hourly average or to the ambient noise level if it already exceeds 60 dB (A) hourly average. If not, other measures shall be implemented in consultation with the biologist and the City Manager, as necessary, to reduce noise levels to below 60 dBA hourly average or to the ambient noise level if it already exceeds 60 dBA hourly average. Such measures may include, but are not limited to, limitations on the placement of construction equipment and the simultaneous use of equipment.

- B. If southwestern willow flycatcher are not detected during the protocol survey, the qualified biologist shall submit substantial evidence to the City Manager and applicable resource agencies which demonstrates whether or not mitigation measures such as noise walls are necessary between May 1 and September 1 as follows:
 - I. If this evidence indicates the potential is high for southwestern willow flycatcher to be present based on historical records or site conditions, then condition A.III shall be adhered to as specified above.
 - II. If this evidence concludes that no impacts to this species are anticipated, no mitigation measures would be necessary.

Historical Resources

MM 5.6-1: Historical Resources Archaeological Data Recovery Program

1. Prior to issuance of 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 Owner/Permittee shall ensure that the following mitigation measures are outline verbatim on appropriate construction plans.
2. The project requires implementation of an Archaeological Data Recovery Program (ADRP) to mitigate impacts to archaeological site (SDI-11767, SDI-12220, and SDI-12126) prior to the issuance of ANY construction permits or the start of ANY construction if no permits are required. The ADRP with Native American participation consists of a Statistical Sample and

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shall be implemented as described below after consultation with DSD ED in accordance with the Cultural Resources Report prepared by (*Riverwalk Redevelopment Project Archaeological Research and Data Recovery Program* (ASM Affiliates Inc., February 2020).

- a. A sampling strategy shall be conducted in accordance with the Methods Section of the *Riverwalk Redevelopment Project Archaeological Research and Data Recovery Program* (ASM Affiliates Inc., February 2020). Additional test units can be added in consultation with DSD EAS, project archaeologist, and Native American Monitor
- b. Laboratory Analysis in the form of specialized studies shall be conducted in accordance with the ADRP;
- c. Curation of all materials recovered during the ADRP with the exception of human remains and any associated burial goods, shall be prepared in compliance local, state and federal standards and be permanently curated at an approved facility that meets City standards;
- d. ADRP provision for the discovery of human remains shall be invoked in accordance with the California Public Resources Code, the Health and Safety Code. In the event human remains are encountered during the ADRP, soil shall only be exported from the project site after it has been cleared by the Most Likely Descendant (MLD) and the Project Archaeologist;
- e. Archaeological and Native American Monitoring shall be conducted during the remaining grading activities after completion of the ADRP and acceptance of a draft progress report for the program. The detailed Mitigation Monitoring and Reporting Program is identified in below.
- f. Upon completion of the ADRP and prior to issuance of grading permits, the qualified archaeologist and Native American Monitor shall attend a second preconstruction meeting to make comments and/or suggestions concerning the proposed grading process.

Discovery of Human Remains During Data Recovery

- i. The Archaeological Data Recovery Plan (ADRP) provisions for the discovery of human remains shall be invoked in accordance with the California Public Resources Code and the Health and Safety Code. In the event that human remains are encountered during the ADRP, soil shall only be exported from the project site after it has been cleared by the MLD and the project archaeologist. Any potential human remains recovered during the ADRP shall be directly repatriated to the MLD or MLD Representative at the location of the discovery.

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- ii. If the MLD does not make a recommendation within 48 hours of notification, or if the recommendations are not acceptable to the landowner following extended discussions and mediation between the City of San Diego and the MLD, the landowner shall reinter the remains and burial items with appropriate dignity on the property in a location not subject to further subsurface disturbance. The location of reinternment shall be protected by recording the location with the NAHC and the South Coastal Information Center.
 - 1. There shall be no further excavation or disturbance in that portion of the site or any nearby area reasonably suspected to overlie adjacent human remains until the San Diego County Medical Examiner is contacted and the discovery location shall be mapped by the monitoring archaeologist and protected and secured from further disturbance whenever possible.
 - 2. The monitoring archaeologist shall notify the Principal Investigator, the City Mitigation Monitoring Coordinator, and will contact the San Diego County Medical Examiner. The Medical Examiner shall make a determination as to the origins of the human remains.
 - 3. If the remains are recognized as or suspected to be Native American by the Medical Examiner or an authorized representative, the Medical Examiner shall contact the California Native American Heritage Commission (NAHC) within 24 hours of the discovery.
 - 4. The NAHC designates and contacts the Most Likely Descendant (MLD).
 - 5. The MLD shall make a recommendation for treatment of the remains and associated burial items within 48 hours of notification. Possible options for treatment may include:
 - a. Preservation in place and avoidance.
 - b. Reburial of the remains on the property in an area to remain undisturbed by the landowner.
 - c. Transport of the remains off-site.
 - 6. The landowner shall discuss with the Most Likely Descendant all reasonable options regarding the descendant's preferences for the treatment of human remains and any associated grave goods, as provided in PRC Section 5097.98.
 - 7. ADRP provisions for the discovery of human remains shall be invoked in accordance with the California PRC and the Health and Safety Code. In the event that human remains are encountered during the ADRP, soil shall only be

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exported from the project site after it has been cleared by the MLD and the project archaeologist. Any potential human remains recovered during the ADRP shall be directly repatriated to the MLD or MLD Representative at the location of the discovery.

MM 5.6-2: Historical Resources (Archaeological and Native American Monitoring)

I. Prior to Permit Issuance

- A. Entitlements Plan Check
 - 1. Prior to issuance of any construction permits, including but not limited to, the first Grading Permit, Demolition Plans/Permits and Building Plans/Permits or a Notice to Proceed for Subdivisions, 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 applicable construction documents through the plan check process.
- 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 meet the qualifications established in the HRG.
 - 3. Prior to the start of work, the applicant must obtain written 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 Coastal 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, Native American consultant/monitor (where Native American resources may be impacted), Construction Manager (CM) and/or

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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) (with verification that the AME has been reviewed and approved by the Native American consultant/monitor when Native American resources may be impacted) 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 all soil disturbing and grading/excavation/trenching activities which could result in impacts to archaeological resources as identified on the AME. The Construction Manager is responsible for notifying the RE, PI, and MMC of changes to any construction activities such as in the case of a potential safety concern within the area being monitored. In certain circumstances OSHA safety requirements may necessitate modification of the AME.
 2. The Native American consultant/monitor shall determine the extent of their presence during soil disturbing and grading/excavation/trenching activities based on the AME and provide that information to the PI and MMC. If prehistoric resources are encountered during the Native American consultant/monitor's absence, work shall stop and the Discovery Notification Process detailed in Section III.B-C and IV.A-D shall commence.

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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 that may reduce or increase the potential for resources to be present.
 4. The archaeological and Native American consultant/monitor shall document field activity via the Consultant Site Visit Record (CSV). The CSV's shall be faxed by the CM to the RE the first day of monitoring, the last day of monitoring, monthly (Notification of Monitoring Completion), and in the case of ANY discoveries. The RE shall forward copies to MMC.
- B. Discovery Notification Process
1. In the event of a discovery, the Archaeological Monitor shall direct the contractor to temporarily divert all soil disturbing activities, including but not limited to digging, trenching, excavating or grading activities in the area of discovery and in the area reasonably suspected to overlay adjacent resources 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.
 4. No soil shall be exported off-site until a determination can be made regarding the significance of the resource specifically if Native American resources are encountered.
- C. Determination of Significance
1. The PI and Native American consultant/monitor, where Native American resources are discovered 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) which has been reviewed by the Native American consultant/monitor, 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. Note: If a unique archaeological site is also an historical resource as defined in CEQA, then the limits on the amount(s) that a project applicant may be required to pay to cover mitigation costs as indicated in CEQA Section 21083.2 shall not apply.
 - c. If the 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.

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IV. Discovery of Human Remains

If human remains are discovered, work shall halt in that area and no soil shall be exported off-site until a determination can be made regarding the provenance of the human remains; and the following procedures as set forth in CEQA Section 15064.5(e), 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) of the Development Services Department to assist with the discovery notification process.
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 provenance of the remains.
2. The Medical Examiner, in consultation with the PI, will determine the need for a field examination to determine the provenance.
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 CEQA Section 15064.5(e), the California Public Resources 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 will be determined between the MLD and the PI, and, if:
 - a. The NAHC is unable to identify the MLD, OR the MLD failed to make a recommendation within 48 hours after being granted access to the site, 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, the landowner shall reinter the human remains and items associated with Native American human remains with

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appropriate dignity on the property in a location not subject to further and future subsurface disturbance, THEN

- c. 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; or
 - (3) Record a document with the County. The document shall be titled "Notice of Reinterment of Native American Remains" and shall include a legal description of the property, the name of the property owner, and the owner's acknowledged signature, in addition to any other information required by PRC 5097.98. The document shall be indexed as a notice under the name of the owner.

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 CSV 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. Discovery of human remains shall always be treated as a significant discovery.
 - c. Potentially Significant Discoveries
If the PI determines that a potentially significant discovery has been made, the procedures detailed under Section III - During Construction and IV-Discovery of Human Remains 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)

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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. It should be noted that if the PI is unable to submit the Draft Monitoring Report within the allotted 90-day timeframe resulting from delays with analysis, special study results or other complex issues, a schedule shall be submitted to MMC establishing agreed due dates and the provision for submittal of monthly status reports until this measure can be met.

- 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.
 3. When applicable to the situation, the PI shall include written verification from the Native American consultant/monitor indicating that Native American resources were treated in accordance with state law and/or applicable agreements. If the resources were reinterred, verification shall be provided to show what protective measures

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were taken to ensure no further disturbance occurs in accordance with Section IV – Discovery of Human Remains, Subsection 5.

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.

Noise (Operational)

MM 5.8-1: Prior to issuance of Building Permit the City shall require the design and installation of stationary noise sources for the project to include the following:

- Implement best design considerations and shielding, including installing stationary noise sources associated with HVAC systems indoors in mechanical rooms.
- Prior to the installation of equipment, the applicant or its designee shall prepare an acoustical study(s) of proposed mechanical equipment, which shall identify all noise-generating equipment, predict noise level property lines from all identified equipment, and recommended mitigation to be implemented (e.g., enclosures, barriers, site orientation), as necessary, to comply with the City of San Diego noise ordinance.

MM 5.8-2: As part of any General Development Plan for the Riverwalk River Park, if an amphitheater is included in the site plan, Owner/Permittee shall perform an acoustical evaluation of the amphitheater, to be reviewed by both DSD and MSCP, that identifies the location and orientation of the amphitheater and confirms that noise levels from the amphitheater would not exceed 60 dBA hourly average at the MHPA boundary.

Tribal Cultural Resources

MM 5.10-1 Prior to issuance of Building Permit or beginning of any construction related activity for the Riverwalk River Park, the Development Services Department (DSD) Director's Environmental Designee (ED) shall verify the plant palette shown on construction documents includes plants from the following species traditionally utilized by the Native American tribes culturally affiliated with the project area in barrier plantings and adjacent to the River Park Pathway: mugwort (*Artemisia douglasiana*), mulefat (*Baccharis salicifolia*), western ragweed (*Ambrosia psilostachya*), California deergrass (*Muhlenbergia rigens*), red willow (*Salix lasiolepis*), elderberry (*Sambucus nigra*), Fremont's cottonwood (*Populus fremontii*), black willow (*Salix exigua*), and arroyo willow (*Salix lasiolepis*), yerba

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mansa (*Anemopsis*), spiny rush (*Juncas acutus*), pale spikerush (*Elocharis macrostachya*), Saltmarsh fleabone (*Pluchea odorata*), Creeping wild rye (*leymus tritcoides*), San Diego sagewort (*Artemisia palmeri*), Tarragon (*Artemisia dracunculus*), and Purple needlegrass (*Stipa pulchra*).

- MM 5.10-2** Prior to issuance of Building Permit or beginning of any construction related activity for the Riverwalk River Park, the Development Services Department (DSD) Director's Environmental Designee (ED) shall verify the interpretive signage along the River Pathway as shown on construction documents. Signage shall include 20 plant identification signs (each approximately 6 by 8-inches) along the River Pathway with plants traditionally utilized by Native American tribes identified by a symbol. A storyboard sign (approximately 20 by 30 inches) shall also be provided that describes the native plants identified along the river pathway and their relationship to the Kumeyaay people's ability to thrive in the region. The interpretative signage plan shall be reviewed and accepted to the satisfaction of DSD, lipay of Santa Isabel, and Jamul Indian Village.
- MM 5.10-3** Prior to recordation of Final Map for the South District, Owner/permittee shall submit a street sign plan that includes Kumeyaay street names to be reviewed and accepted to the satisfaction of DSD.
- MM 5.10-4** Prior to issuance of any construction permits, such as Demolition, Grading or Building, or beginning any construction related activity on-site, Owner/Permittee shall implement the conditions as detailed in MM 5.6-1 Historical Resources (Archaeological Data Recovery Monitoring) and MM 5.6-2 Historical Resources (Archaeology and Native American Monitoring).

12.0 REFERENCES

A list of the reference materials consulted in the course of the EIR's preparation is included in this section.

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