

APPENDIX A

NOP COMMENT LETTERS



**MAYOR KEVIN L. FAULCONER
CITY OF SAN DIEGO**

FOR IMMEDIATE RELEASE
Thursday, September 25, 2014

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NEWS RELEASE

**Faulconer, Lightner Back Plan to Protect Canyon Park, Start
Community Process to End Regents Road Bridge Controversy**
*City to study removing cross-canyon bridge project from community
plan, review new fire stations for University City*

SAN DIEGO – Mayor Kevin L. Faulconer and Council President Pro Tem Sherri S. Lightner today announced their support for a community-driven solution to end the controversial plan to build a bridge through Rose Canyon.

“It’s time to move forward with a realistic plan that can be put into action and deliver real results for this community. This new plan will protect our environment, help the community get the fire protection it needs, and give us the final word on the Regents Road Bridge,” Mayor Faulconer said.

On Monday the City Council is scheduled to vote on studying the removal of the Regents Road Bridge project from the University City community plan. Doing so will provide certainty for the future of the community and help City planners focus on alternative solutions to ensure south University City is more accessible to emergency first responders. Building one or more fire stations south of Rose Canyon is one of the options that will be explored.

“Next week’s action by the City Council is the first step needed to bring University City into the 21st century,” Lightner said. **“This community will benefit from added public safety and community facilities, all while preserving the picturesque Rose Canyon Open Space**

Park and protecting South University City neighborhoods from unacceptable traffic congestion.”

The question of whether or not to build the Regents Road Bridge through the canyon that separates north and south University City has prompted considerable controversy and environmental concerns over the last two decades. The bridge proposal has been the subject of litigation, numerous City Council hearings and public debates.

The process to amend the University City community plan will include a new analysis of traffic and emergency response times.

“I fully support this approach,” Assistant San Diego Fire Chief Brian Fennessy said. **“It means we’re focusing on genuine solutions to improve emergency response times in south University City.”**

The announcement drew praise from environmental and community groups.

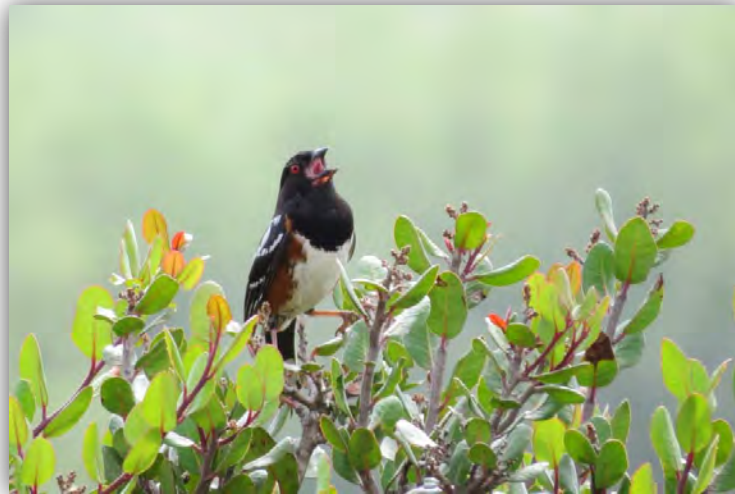
“I applaud Mayor Faulconer for taking action to protect our environment, parks and open space. And I thank Council President Pro Tem Lightner for championing this issue on the City Council,” said Debby Knight, Friends of Rose Canyon Executive Director. **“The bridge would seriously impact Rose Canyon Open Space Park, and removing it from the community plan will help us preserve this land for generations to come.”**

“Our community has been looking for leadership from City Hall, and we are looking forward to putting this divisive issue behind us,” University Community Planning Group Chair Janay Kruger said. **“We have many transportation projects and systems that have come online or are in the process of being built since the bridge was first added to our community plan in 1987. These include the new I-5 and Genesee interchange, the mid-coast trolley line that will connect to University Town Center, the SuperLoop bus system, and private and public shuttles. Our driving patterns have changed and now they need to be studied to bring our circulation plan and community plan up to date.”**

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Canyon Sewer Cleaning Program and Long Term Sewer Maintenance Program Progress Report

City of San Diego
Public Utilities Department



2014 Annual Report
July 1, 2013 – June 30, 2014



Cover: Top: Spotted Towhee singing on lemonadeberry (Paver), Bottom: Sewer Repair and Manhole

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ACRONYMS AND ABBREVIATIONS

ACOE	Army Corps of Engineers
BMP	Best Management Practices
CDFW	California Department of Fish and Wildlife
CIP	Capital Improvement Project
DSD	Development Services Department
MEAP	Long Term Maintenance and Emergency Access Plan
MHPA	Multiple Habitat Planning Area
OSCAC	Open Space Canyons Advisory Committee
PEIR	Programmatic Environmental Impact Report
PEP	Plant establishment period
Program	Canyon Sewer Cleaning Program and the Long-term Canyon Sewer Maintenance Program
Public Utilities	City of San Diego Public Utilities Department
ROF	Redirection of Flow
SCR	Substantial Conformance Review
WWC	Wastewater Collection Division

EXECUTIVE SUMMARY

In response to an Administrative Order from the U.S. Environmental Protection Agency, in an effort to reduce sewer spills and beach closures, and under the direction of Council Policies 400-13 and 400-14, the City of San Diego's Public Utilities Department (Public Utilities) has adopted the Canyon Sewer Cleaning Program and the Long-term Canyon Sewer Maintenance Program (Program) to access, clean, and repair miles of sewer infrastructure located in canyons and other environmentally sensitive areas.

A Programmatic Environmental Impact Report (PEIR) was prepared to study the Program and in July 2004 the City of San Diego approved Coastal Development Permit No. 13506 and Site Development Permit No. 13507 for the Program.

The objectives of the Program are:

- To complete the inspection and cleaning of City of San Diego sewer infrastructure located in canyons and other environmentally sensitive areas.
- To identify and implement efficient, effective, and environmentally sensitive means to accomplish the necessary canyon sewer cleaning activities.
- To provide for long-term maintenance of canyon sewer infrastructure, recognizing that availability of access to the infrastructure is essential for an effective long-term program, in accordance with Council Policy 400-13.
- To evaluate and pursue options to redirect sewage flows out of canyons and into street sewer lines or other accessible areas, where feasible and appropriate pursuant to Council Policy 400-14.

This annual report, as required by the site development permit condition 27, provides a Progress Report to the Open Space Canyons Advisory Committee (OSCAC) on the Program for the year from July 1, 2013 through June 30, 2014. This report provides the status of all Program activities within the reporting year, including habitat mitigation, long term access planning and implementation, construction and emergency projects, and 25 month revegetation and restoration projects.

LONG TERM ACCESS PROJECTS

Long Term Sewer Access Projects provide access paths to sewer infrastructure for ongoing maintenance, inspections, and cleaning. One of the first steps in determining whether an access path is needed is to prepare a redirection of flow (ROF) study. A ROF study evaluates the economic feasibility of removing all or part of the sewer from an environmentally sensitive area or canyon versus providing access to the sewer if it remains in place.

When redirection of flow is found to be infeasible from all or portions of environmentally sensitive areas/canyons, Public Utilities staff develop a Long Term Maintenance and Emergency Access Plan (MEAP) in accordance with Policy 400-13. Public Utilities staff prepares and submits a Substantial Conformance Review (SCR) packages to the Development Services Department (DSD) for a determination whether the proposed mitigation, restoration, and access planning for individual canyon areas or project is in conformance with the PEIR and Program master permits. Project specific design plans are then prepared as necessary to provide specific direction on access improvements and construction that include additional information necessary to obtain regulatory agency permits. Separate permits or clearances are obtained from the regulatory agencies prior to implementation of long term access projects.

The following canyons are in various stages of long term access planning and implementation:

- 32nd Street – Sewer access paths located in upland areas have had wood chips installed and are currently being used by the Wastewater Collection (WWC) Division. Public Utilities staff received regulatory agency permit approval to construct access path improvements at streambed crossings; however, Public Utilities is currently analyzing an alternate path alignment to avoid wetland impacts to streambeds. Public Utilities is working with Real Estate Assets Department to acquire an easement to build a portion of the upland access path on private property. The new access paths will be constructed by the WWC Division.
- Alvarado – The long term sewer access plan has been approved in concept and the detailed access path design for this project is complete. Public Utilities staff is working on the environmental permits, property acquisition, and developing contract documents.
- Black Mountain – Implementation of long term sewer access for this canyon has been completed. Public Utilities staff are working with the Park and Recreation Department on finalizing a Memorandum of Understanding for the ongoing maintenance and use of access paths.
- Park Mesa – City forces completed construction of the long term access path in the summer of 2011. The project required easement acquisition from four

property owners. All easements have been acquired. This access project is complete and the WWC Division will continue to maintain the path for ongoing sewer inspections, cleaning and maintenance.

- Rancho Mission – Public Utilities reassessed the canyon access plan, identified an alternative access using existing paths, and eliminated the need for one stream crossing. Access path improvements on the east side of Margerum Avenue were completed by City forces in November 2011. Environmental permits were obtained from the regulatory agencies in 2013 to construct an improved streambed crossing. The design and construction of the streambed crossing on the west side of Margerum Avenue was completed in November of 2013.



Rancho Mission – Improved Streambed Crossing

- Tecolote East – Design drawings have been prepared that include numerous streambed crossing improvements. Public Utilities staff has started on the resource agency permit applications and developing contract documents for constructing the access path improvements. Improvements will be necessary to provide access to the manholes located in the streambed areas.
- Norfolk Canyon – Public Utilities staff is awaiting final regulatory agency approvals for the upsizing of one pipe culvert along the existing access path. Following the receipt of the permits, City crews shall initiate this work.
- Home Avenue Trunk Sewer – Public Utilities staff is in the process of completing the SCR submittal, including the Long Term Access Plan, MEAP, and environmental studies.
- Lopez Manhole 13 – A partial implementation of the long term access project in Lopez Canyon occurred during this reporting period. A manhole that had been

previously inaccessible for cleaning was accessed in the Fall of 2013. City crews tracked over low growing vegetation to gain access to the manhole. No grading, filling, or permanent improvements will be made to the new sewer access path.



Lopez Canyon –Towing Cleaning Equipment to Manhole 13

- South Chollas – Public Utilities completed the Long Term Access plan, MEAP, and all preliminary environmental studies. Staff has submitted the SCR package to the DSD for approval. Following approval, paths located in upland areas will be constructed by City forces. Detailed design drawings will be prepared for the streambed crossing improvements.
- North, Central, and Southern Tecolote Canyon – A Long Term Access Plan Technical Memorandum for all three sections of Tecolote Canyon was completed in 2013 and incorporated into a planning study and scope of a larger Capital Improvement Projects (CIP) project. The Technical Memorandum includes the design criteria of all access paths and streambed crossing improvements. The design criteria will be included in the design of the CIP Project when it moves forward.
- VanNuys Canyon – A new ROF Study and Access Recommendation have been completed and the project will be proceeding with long term access design.
- Mt. Elbrus – In November, 2011, WWC installed a prefabricated fiberglass bridge in Mt. Elbrus Canyon as partial long term access implementation. Public Utilities staff is currently designing three additional stream crossing improvements and is starting on agency permits for anticipated construction in 2015.



Mt. Elbrus Canyon- Long Term Access Area In Design

- Manning Canyon – Public Utilities is beginning the process for the SCR submittal, including the Long Term Access Plan, MEAP, erosion control plan and environmental studies.
- Interstate (I)-15 & Balboa – Public Utilities is beginning a ROF study to determine if canyon sewer facilities can be abandoned and if sewer flows can be redirected to Right-Of-Way areas.

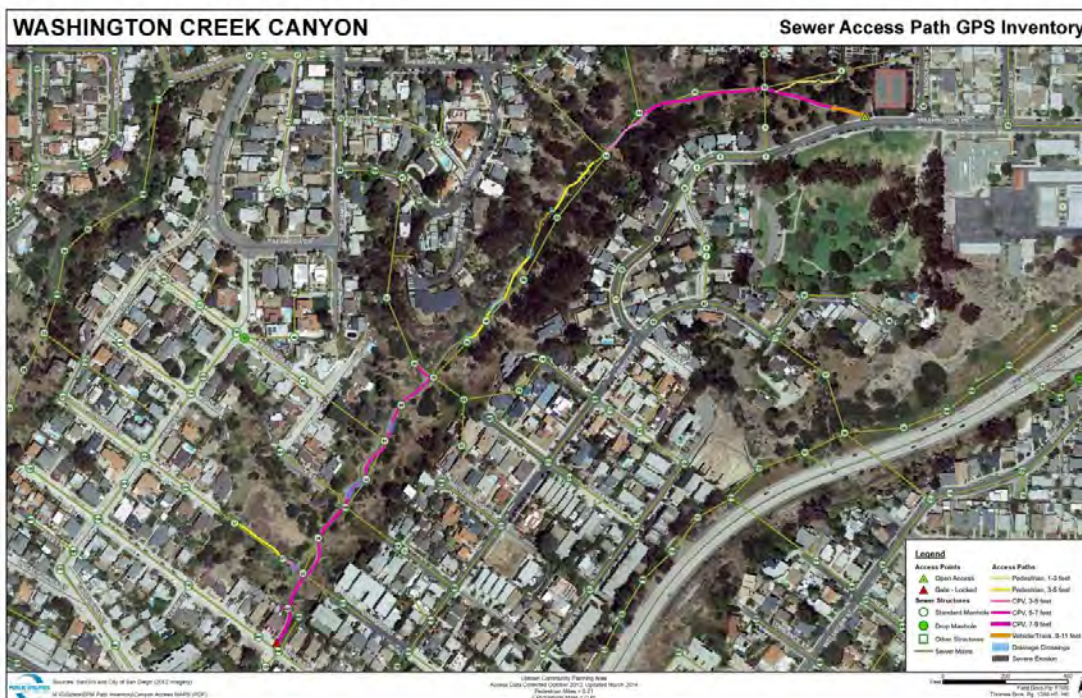
MAINTENANCE, MONITORING, AND MAPPING

Wastewater Collection Division staff coordinated closely with Environmental Staff (Environmental Section) in ensuring daily activities were in compliance with the Program’s master permit, agency permits, and environmental regulations.

Environmental training is provided to all Public Utilities staff working in canyons/environmentally sensitive areas. Crews are directed to contact staff in the Environmental Section for guidance and support for work that may impact sensitive resources.

The Environmental Section reviews daily field work reports, facilitates monthly meetings to discuss and review all work in canyons, obtains permits, and provides daily support to field crews. Work conducted in canyons/environmentally sensitive areas is monitored by the Environmental Section. Bird nesting surveys, vegetation and sensitive species mapping, jurisdictional delineations and other biological surveys are completed by the Environmental Section for daily WWC operation and maintenance of sewer lines in canyons.

Public Utilities has increased its efforts to inventory and map existing access to sewers in canyons. This inventory provides information on existing access conditions, identifies access needs and areas of concern), and facilitates ongoing maintenance. To date, 165 miles of pedestrian and vehicular paths have been mapped with the GPS data for 136 canyon areas. Vehicle access path data is updated quarterly and is available on SanGIS.



Access Path Inventory Map for Washington Creek Canyon

CONSTRUCTION AND EMERGENCY PROJECTS

During this reporting period seven CIP projects were completed or are still in construction: GJs 616, 672A, 693, 703A, 787, and GJ 799 Alvarado TS PH IIIA. Planning and permitting is complete or in process for a number of additional projects that are anticipated once contracting is complete or funding is available. These include Group Jobs 833, 836, 965, 966, Sewer Rehabs AG-1, AB-1 and Z-1, Skylark Canyon sewer, Rose Canyon TS Joint Repair, Tecolote Canyon and Manning Canyon sewer abandonment projects. These jobs are managed by the Engineering and Capital Projects, Public Works Department.

Since July of 2013, emergency projects and/or pipeline/manhole repair projects occurred in the following canyons or environmentally sensitive areas:

Emergencies

- Buchanan Canyon Sewer Blockage (blocked pipe, pipe repair, access)
- Camino Del Rio South (blocked pipe, buried manhole, cleaning)
- Tecolote North Pipe Repair (pipe repair and protection)
- Spruce Mh 220 (manhole replacement)
- Siesta Drive (pipe repair)
- El Camino Real (Sewer Spill)

Other construction projects

- I-15 Buried Manhole 9 (manhole locate and raise)
- Loma Pass Buried Manhole (manhole locate and raise)
- Market Street MH (manhole locate and raise)
- San Diego River West (temp access, manhole raise, cleaning)
- Famosa Slough Pipe Repair (spot repair)
- Spruce Canyon Pipe Repair (pipe repair)
- Manning Canyon Sewer Repair (pipe repair)
- Camino Del Rio North Mh Replacement (manhole maintenance)
- Switzer Canyon MH 152 Access (access creation, cleaning)
- Washington Creek Access Path (path improvements)
- Switzer Sinkhole Repairs (access path maintenance)
- Ash Street and Granada Repair (pipe repair)
- 28th Street Access (path maintenance)
- Sweetwater MH 3 Repair (manhole maintenance)
- Juniper Street Spot Repair (pipe repair)
- Tecolote North Access (path maintenance)
- Pump Station 77 Force Main Inspection (pipeline inspection)
- Old Town McCoy House Sewer Repair (pipe repair)
- Otay Valley Trunk Sewer Pipe Protection (pipe protection)

Public Utilities crews completed access path maintenance in multiple canyon areas to facilitate access for cleaning, inspections and maintenance. Path maintenance is usually limited to trimming or mowing vegetation that has grown on the pathways. Maintenance on the access path precedes manhole cleaning and maintenance.

Public Utilities staff manages emergency and non-CIP construction projects. Environmental review, monitoring, and reporting are done in adherence with the Program. Biological assessments have been prepared and permits have been obtained as necessary for these emergency and construction projects. Following construction, revegetation and/or restoration has been implemented in accordance with the Program.



Spruce Canyon Pipe Repair



San Diego River West Manhole Raise and Cleaning



Buchanan Emergency Sewer Blockage Emergency Access and Repair

25 MONTH REVEGETATION AND RESTORATION PROJECTS

Conditions of the Master permit require effective erosion control of access paths and restoration of temporarily impacted areas outside of permanent access paths following construction. Each impact area is monitored and maintained for a period of no less than 25 months.

Revegetation sites include all areas required for permanent access to utilities including the access paths, turn-arounds, and work areas around manholes. When new access paths and permanent access areas are created, revegetation is required. The goal of revegetation is successful erosion control. Maintenance and monitoring of revegetation areas may include hydroseeding or hand-seeding, weeding, mulching or installing wood chips on the path, installation of temporary Best Management Practices (BMPs), site monitoring or a combination of the above treatments.

Restoration sites are areas impacted outside of permanent access areas. Restoration areas are typically staging areas, emergency access or work areas, pipeline repair areas, unauthorized impact areas, or areas disturbed as a result of temporary widening of pathways. The goal of habitat restoration is re-establishment of native habitat. Restoration areas shall obtain native plant coverage equal to the native species present in the adjacent area or 30% coverage, whichever is greater. Restoration areas shall support no more than 1% perennial weeds and no more than 10% annual weeds during the 25 month maintenance period. Maintenance and monitoring of restoration areas may include hydroseeding or hand-seeding, installation of container plants, weeding, installation of temporary BMPs, temporary irrigation, site monitoring or a combination of the above treatments.

Seed and plant material used for revegetation and restoration efforts is from locations within 25 miles of the coastline in San Diego County. Maintenance and monitoring of all sites continues for 25 months or until successful erosion control is achieved on the paths and/or restoration goals are met outside of the paths.

During this reporting year, ten (10) sewer revegetation projects were completed. In addition to eleven (11) ongoing projects, nine (9) additional sites were installed and maintenance and monitoring of these sites was initiated.

Updates on the status of the revegetation and restoration projects are a regular agenda item at OSCAC's meetings. See Attachment A for the July 2014 Revegetation and Restoration Projects Status update table.



Pump Station 77 Forcemain Restoration Area

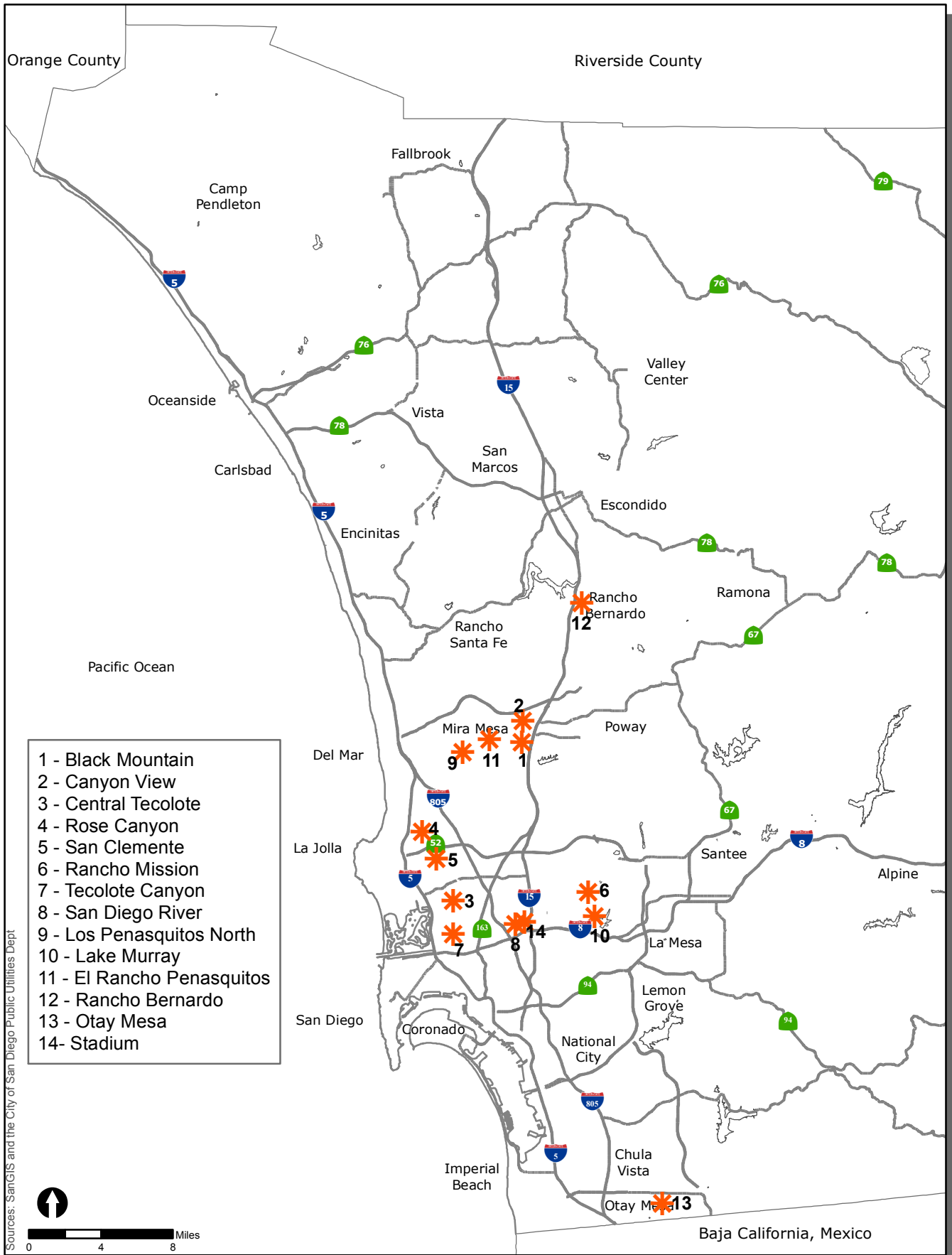


Spruce MH 220 Replacement Revegetation (erosion control) Project

MITIGATION PROJECTS

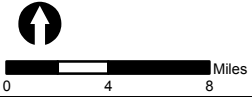
In accordance with applicable local, state, and federal regulations, restoration, revegetation, or mitigation is required for significant biological impacts resulting from the Program, such as the creation of access paths through environmentally sensitive areas, emergency repairs, and pipeline repair projects. In order to mitigate these impacts, Public Utilities staff has identified and implemented a number of habitat mitigation projects located within various watersheds where past, current, or future impacts have or may occur. These mitigation sites are designed and built to accommodate numerous Public Utilities projects. Allocation of mitigation is completed as each project is planned, permitted and constructed. Post construction adjustments are made to mitigation assignments based on actual project impacts. Project impacts and mitigation assignments are tracked internally within the Canyon Database. A summary of acreages available, assigned and the balance is included as Attachment B. A more detailed summary of assignments is included as Attachment C.

The location of these projects is shown in Figure A. The status of each habitat mitigation project is summarized below.



- 1 - Black Mountain
- 2 - Canyon View
- 3 - Central Tecolote
- 4 - Rose Canyon
- 5 - San Clemente
- 6 - Rancho Mission
- 7 - Tecolote Canyon
- 8 - San Diego River
- 9 - Los Penasquitos North
- 10 - Lake Murray
- 11 - El Rancho Penasquitos
- 12 - Rancho Bernardo
- 13 - Otay Mesa
- 14 - Stadium

Sources: SanGIS and the City of San Diego Public Utilities Dept



**PUD Mitigation Sites
Overview Map**

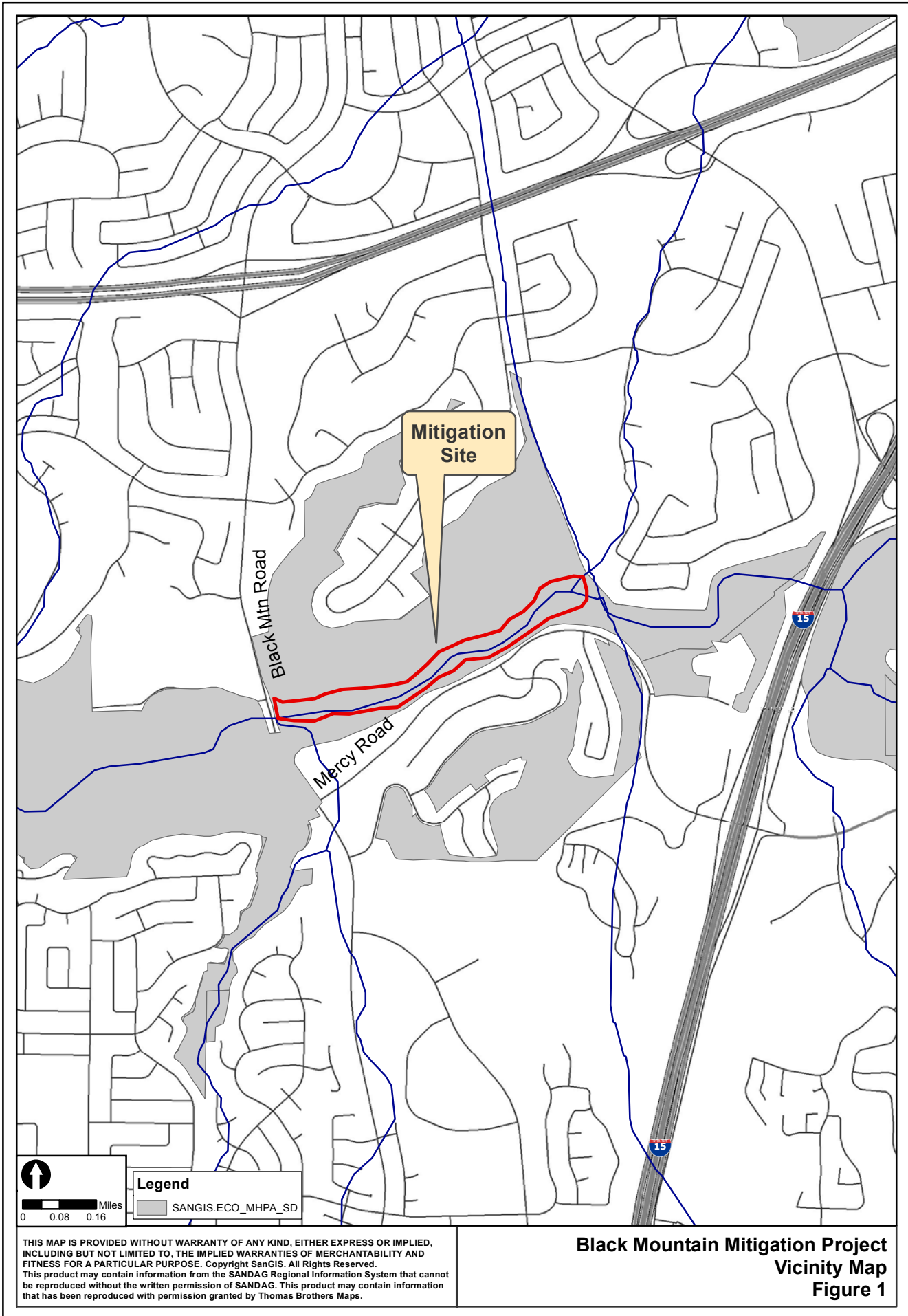
**FIGURE
A**

Black Mountain Wetland Mitigation Project

This project is currently on hold pending discussions between Park and Recreation Department and Public Utilities. If the project is determined feasible, Public Utilities will proceed with resource agency submittals and approvals to implement this project to serve the mitigation needs of the Public Utilities for impacts within the Los Penasquitos Canyon Preserve. This project would be located west of I-15, east of Black Mountain Road, and north of Mercy Road in Los Penasquitos Canyon (Figure 1). The project area currently supports a large area of invasive non-native plant species that has little value for wildlife. The site currently supports eucalyptus (*Eucalyptus* spp.), Canary Island date palm (*Phoenix canariensis*), Mexican fan palm (*Washingtonia robusta*), Brazilian pepper tree (*Schinus terebinthifolius*), pampas grass (*Cortaderia selloana*), and tamarisk (*Tamarix parviflora*). The goal of the project would be to eradicate all non-native plant species and create native wetland habitat in areas of disturbed uplands. Project components would include weed removal, grading, installation of a temporary irrigation system, planting, seeding, and a 5 year maintenance and monitoring period. Anticipated mitigation credits would be 1.17 acres of wetland creation and 0.79 acres of wetland enhancement.



Black Mountain Mitigation Project Site



Legend
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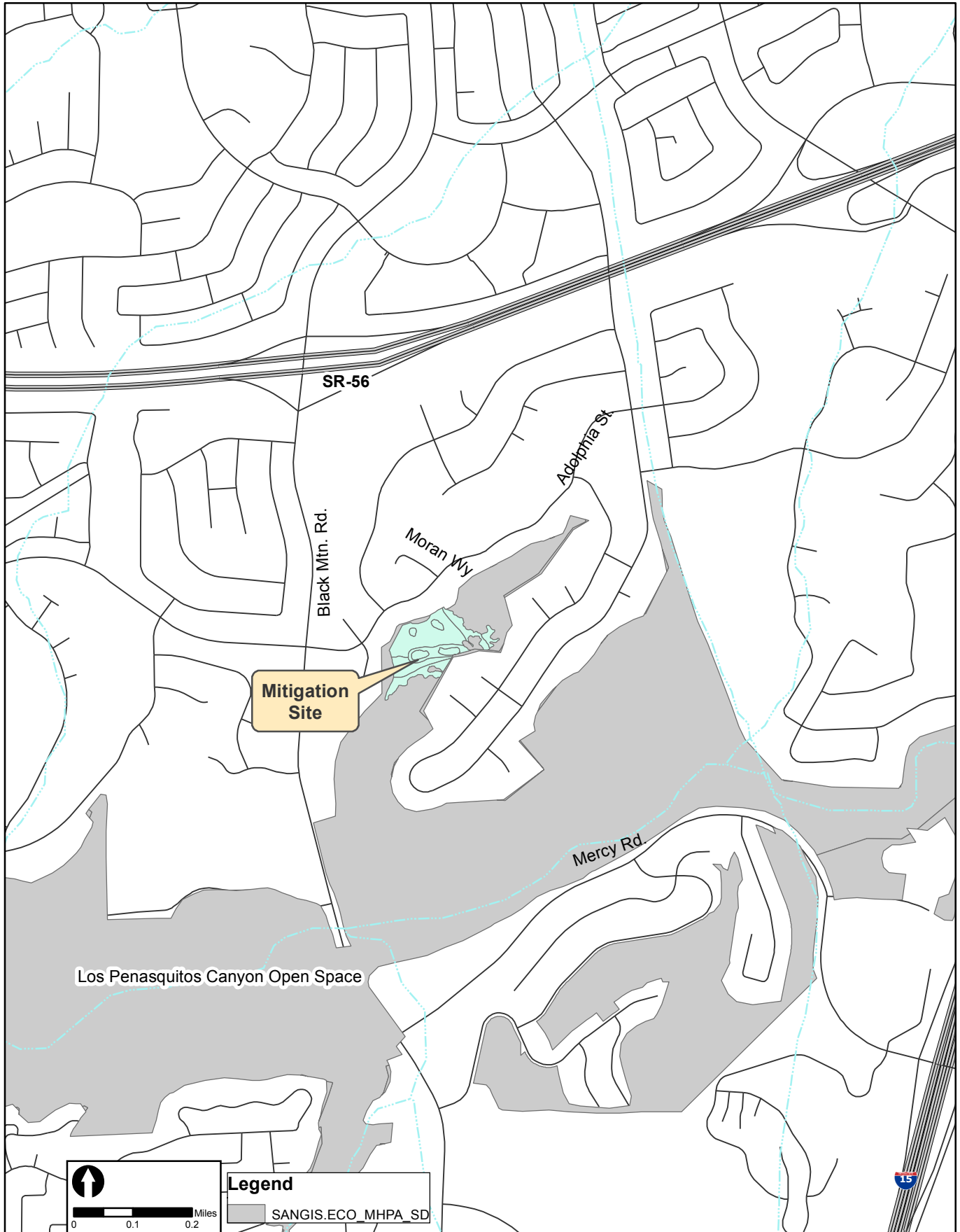
**Black Mountain Mitigation Project
 Vicinity Map
 Figure 1**

Canyon View Upland Restoration Mitigation Project

Construction began in September 2011 for this project, located east of Black Mountain Road and south of Adolphia Street in Los Penasquitos Canyon (Figure 2). The project involves the restoration of approximately 0.9 acres of native grassland and 6.79 acres of Diegan coastal sage scrub habitat, located on City of San Diego owned parcels within Los Penasquitos Canyon. The project serves to mitigate impacts associated with Public Utilities projects located in Los Penasquitos Canyon Preserve. Exotic species removed from the site include: mustard (*Brassica* sp.), artichoke thistle (*Cynara cardunculus*), tocalote (*Centaurea melitensis*), and many non-native grass species. The project is using recycled water for temporary irrigation during the plant establishment phase. Coastal California gnatcatchers (*Polioptila californica californica*) have been observed foraging onsite within the Diegan coastal sage scrub habitat. The site is currently in year 2 of the 5 year maintenance and monitoring period. The site will be maintained and monitored for the 5-year period until agency sign off. The goal of the project is to restore low quality non-native uplands into high quality native habitats.

Mitigation Credits			
Habitat Type	Acres	Assigned	Balance
Diegan Coastal Sage Scrub (Tier II)	6.49	1.62	4.87
Native Grassland (Tier I)	0.89	.02	0.87





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**Canyon View Upland Restoration Mitigation Project
Vicinity Map
Figure 2**

Central Tecolote Enhancement Mitigation Project

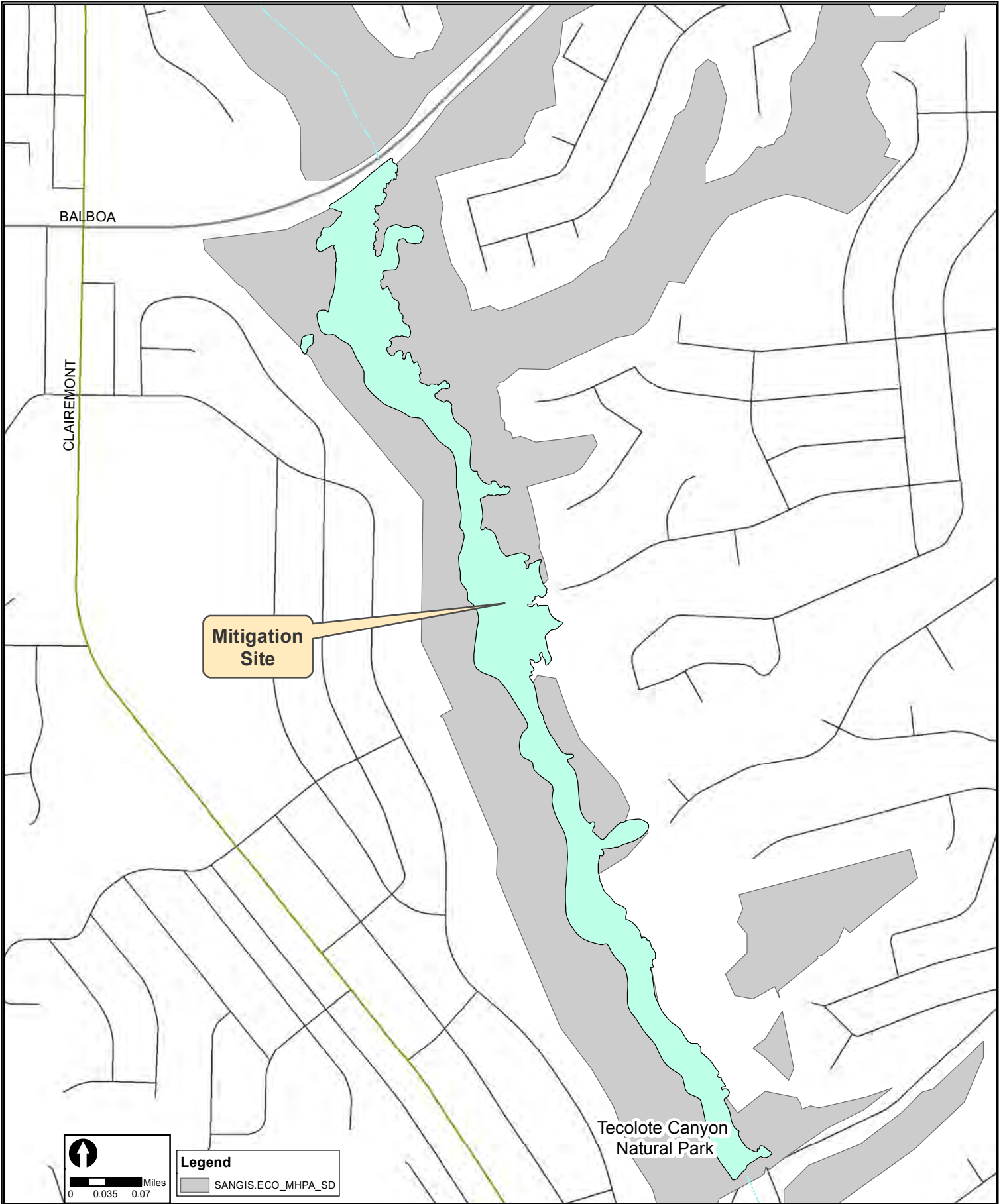
This project is currently in year 3 of the 5-year maintenance and monitoring period. This project is located south of Balboa Avenue and north of Mt. Acadia Boulevard in Tecolote Canyon (Figure 3). The project consists of riparian enhancement and native grassland/coastal sage scrub restoration in addition to a weed management area that encompasses Tecolote Creek.

Exotic species removed from the site include: Brazilian pepper tree, pampas grass, Mexican fan palm, Canary Island date palm, eucalyptus, fennel (*Foeniculum vulgare*), mustard, and yellow sweetclover (*Melilotus indicus*). Maintenance activities completed this year include weed and trash removal, plant replacement, additional seeding, and site protection repair. The site will be maintained and monitored for a minimum 5-year period to ensure successful establishment of native species and until agency sign off.

Coastal California gnatcatchers have been observed foraging onsite within the Diegan coastal sage scrub habitat. Vandalized bat boxes have been re-installed to provide roosting opportunities along the creek. Motion detector cameras have captured wildlife usage of the site.

Mitigation Credits			
Habitat Type	Acres	Assigned	Balance
Oak Riparian Forest	7.95	2.43	5.52
Diegan Coastal Sage Scrub (Tier II)	1.69	0.61	1.08
Native Grassland (Tier I)	1.36	0.10	1.26





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**Central Tecolote Mitigation
Vicinity Map
Figure 3**

Rose Canyon Mitigation Project

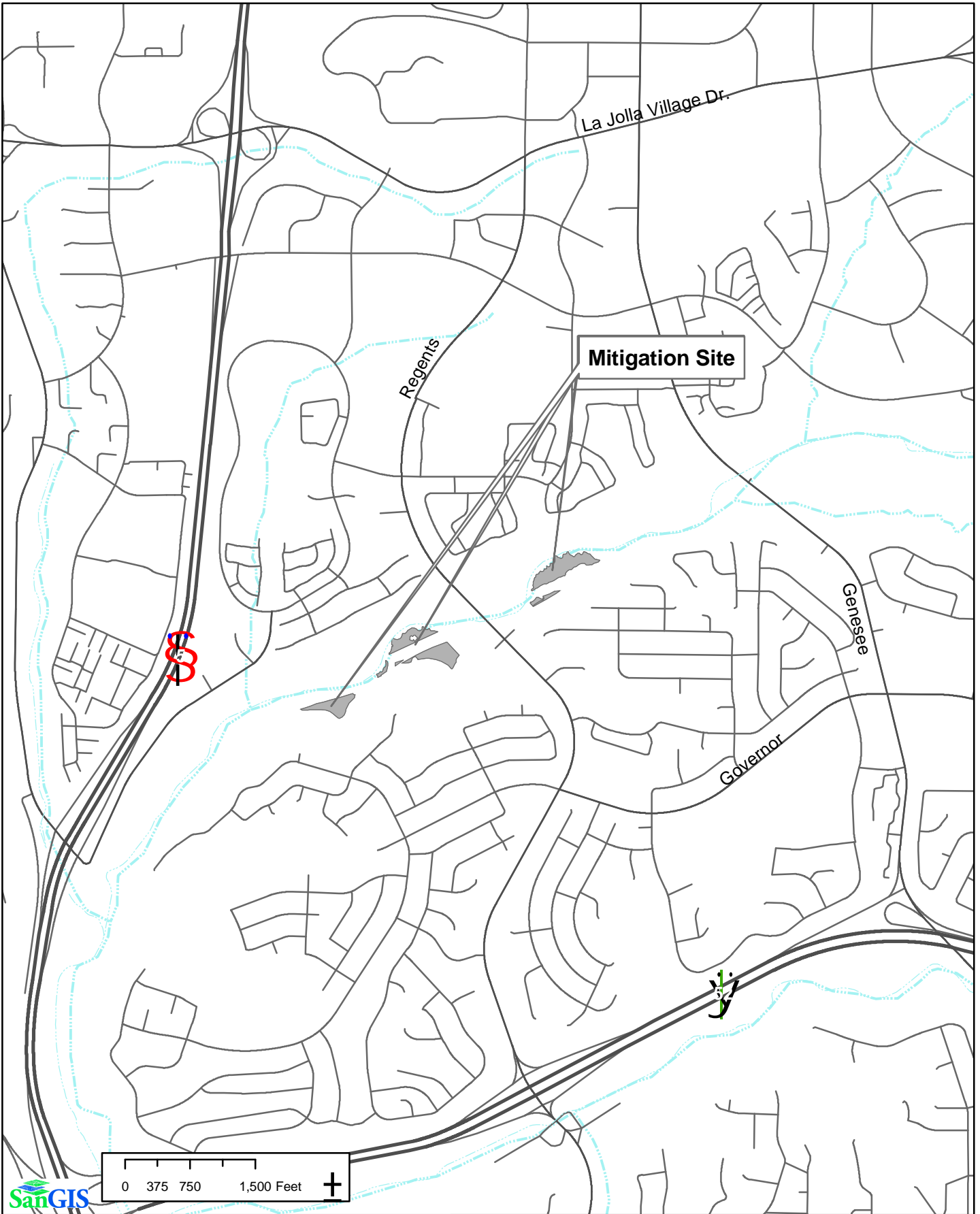
The Rose Canyon Mitigation Project is located in the Rose Canyon Open Space Park, starting approximately one half mile west of Genesee Avenue and continuing another one half mile further west into the park (Figure 4).

Approximately 4.36 acres of oak riparian forest, southern cottonwood-willow riparian forest, and mule fat scrub were created adjacent to Rose Creek. Approximately 3.67 acres of Diegan coastal sage scrub habitat was planted on the upland areas.

Construction was initiated in September 2007 and included clearing of non-native vegetation, grading, installation of a temporary irrigation system, planting, hydroseeding, fencing, and sign installation. The initial revegetation installation was accepted in March 2008, when the site entered the 120-day plant establishment period (PEP). The project entered the 5-year maintenance period on July 15, 2008. The project has completed 5-year of maintenance and is awaiting Corps regulatory sign-off. Vegetative cover at the site is very high, uplands habitat exceeds 80% cover and has a high diversity of species that includes California sagebrush (*Artimisia californica*), white sage (*Salvia apiana*), coyote bush (*Baccharis pilularis*), and San Diego goldenbush (*Isocoma menziessii*). The wetland creation habitat exceeds 100% cover in sections of the project area with canopy height reaching 10 to 15 feet; a number of cottonwood (*Populus* spp.) and willow (*Salix* spp.) recruits were recently observed on the site. Available mitigation acreage below reflects actual acreage of habitats restored at the end of the year 5 maintenance period.

Mitigation Credits			
Habitat Type	Acres	Assigned	Balance
Riparian Forest- creation	5.05	3.44	1.87
Riparian Forest – enhancement	0.61	0.35	0.26
Diegan Coastal Sage Scrub	4.75	2.95	1.80
Native Grassland	0.28	0.20	0.08





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Rose Canyon Mitigation Site
Vicinity Map

Figure 4

San Clemente Canyon Mitigation Project

The San Clemente Canyon Mitigation Project provides mitigation for impacts associated with Public Utilities projects within San Clemente Canyon/Marian Bear Memorial Park and surrounding watershed. The project is located at two sites within the park, one just east of the Regents East parking area and the other approximately three-fourths of a mile east of the Genesee parking area (Figure 5).

The project includes the creation of 2.86 acres of wetland habitat (southern willow riparian forest and oak riparian forest) and 2.81 acres upland habitat (Diegan coastal sage scrub and oak woodland).

Construction was initiated in October 2007. The site reached its 5-year maintenance and monitoring period in September 2013 and is currently awaiting regulatory sign-off from the Army Corps of Engineers (ACOE). The upland and wetland planting areas for the project have shown steady establishment of target species with vegetative cover in portions of the wetland habitat over 100% cover. The wetlands support a willow over story and a well developed understory including species such as California rose (*Rosa californica*) and San Diego marsh elder (*Iva hayesiana*). Available mitigation acreage below reflects actual acreage of habitats restored at the end of the year 5 maintenance period.

Mitigation Credits			
Habitat Type	Acres	Assigned	Balance
Riparian Forest	2.86	2.06	0.80
Diegan Coastal Sage Scrub	2.42	1.67	0.75
Oak Woodland	0.39	0.39	0





Miles
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Legend

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**San Clemente Mitigation Project
Vicinity Map
Figure 5**

Rancho Mission Canyon Wetland Enhancement Project

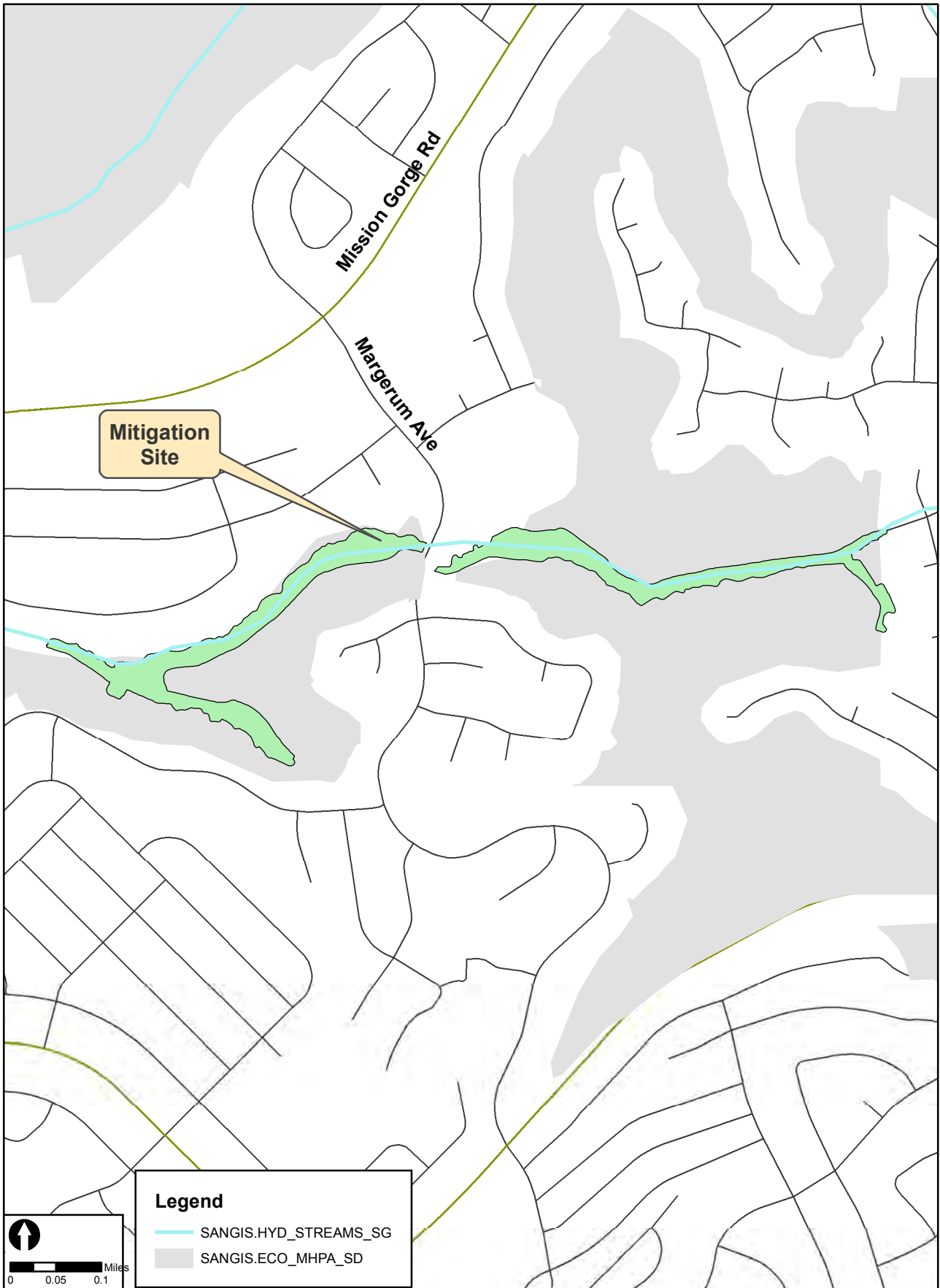
The Rancho Mission Canyon Wetland Enhancement Project is located in the City’s Rancho Mission Canyon Open Space Park, south of Mission Gorge Road, north of Navajo Road, and on either side of Margerum Way in the Allied Gardens Community of the Navajo Community Planning Area (Figure 6).

The Rancho Mission Mitigation Project includes the enhancement of 7.59 acres of wetlands and restoration of 1.53 acres (75% mitigation credit) of wetland transitional habitats. Non-native vegetation was removed from the canyon, followed by revegetation with native southern willow scrub and wetland transitional species. The total area of habitat enhancement runs the entire canyon bottom and encompasses more than 13.5 acres. Exotic species targeted for eradication include: salt cedar (*Tamarix* sp.), myoporum (*Myoporum laetum*), Brazilian pepper tree, pampas grass, Mexican fan palm, and eucalyptus.

The site completed the 5-year long-term maintenance and monitoring period in March 2013. The site currently supports target native cover of approximately 95%, exceeding the year 5 goal of 90%. Regulatory sign-off and approval for the project was received in the summer of 2013. A few individuals of non-native plants were observed during the annual monitoring but are being treated by Park and Recreation as part of long term management of the site.

Mitigation Credits			
Habitat Type	Acres	Assigned	Balance
Southern Willow Scrub	8.74	2.13	6.61





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**Rancho Mission Mitigation
 Vicinity Map
 Figure 6**

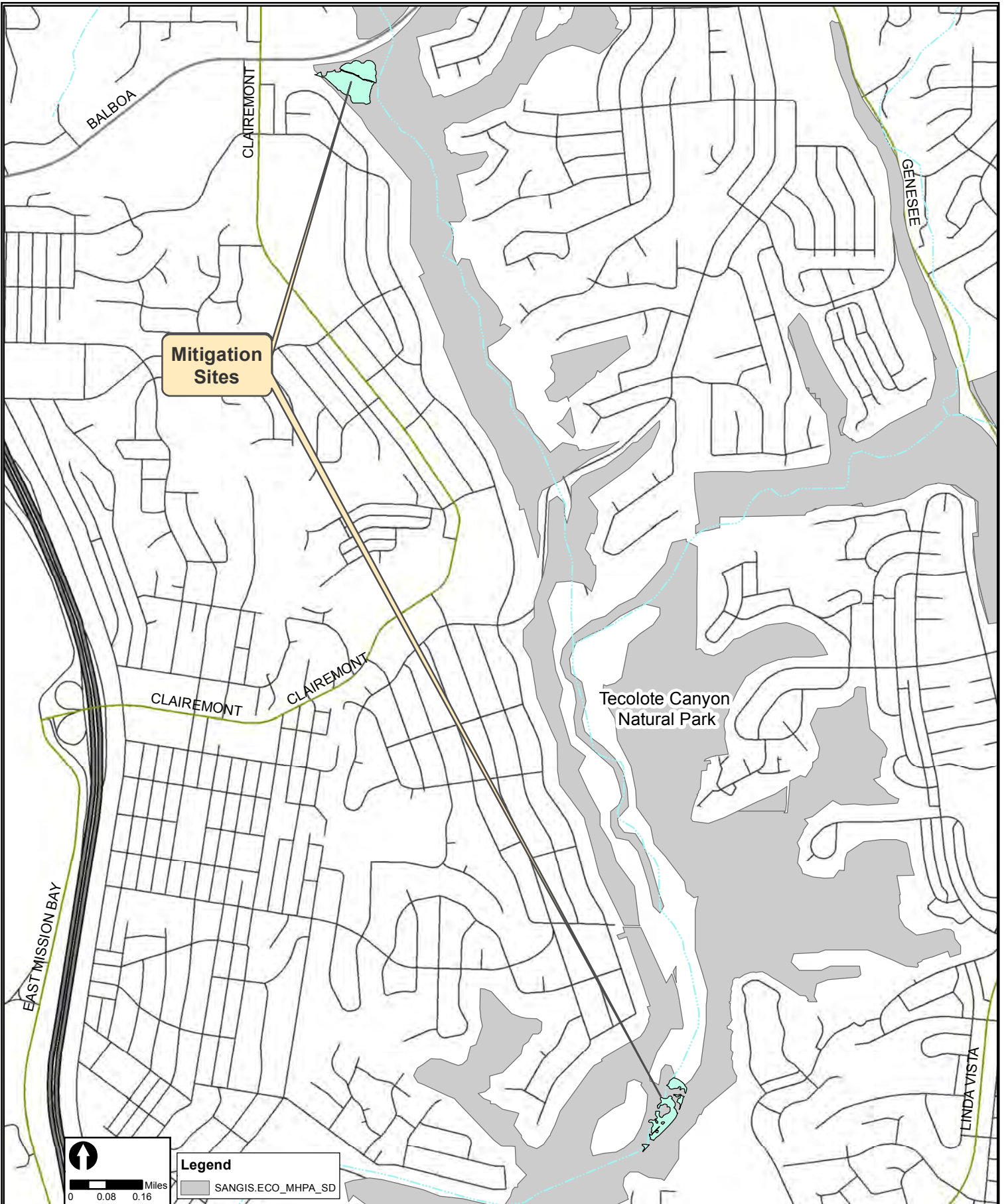
Tecolote Canyon Mitigation Project

The Tecolote Canyon Mitigation Project provides mitigation for impacts associated with projects within Tecolote, Mt. Elbrus, East Clairemont, and Manning Canyons. The Balboa site is located south of Balboa Avenue, and the Grove site is located south of the Tecolote Golf Course and north of the University of San Diego (Figure 7).

The project includes the creation of 1.61 acres of wetland habitat (southern willow scrub, southern cottonwood willow riparian forest, and oak riparian forest) and restoration of 3.37 acres upland habitat (Diegan coastal sage scrub & native grassland). Construction was initiated in February 2007 and the 5-year maintenance and monitoring period began in January 2008. The 5-year success criteria of 80% coverage of wetland vegetation transects has been met and 75% coverage of upland vegetation transects has been exceeded for the project. The site completed its 5-year maintenance and monitoring in the early part of 2013 and has received regulatory sign-off. A qualitative review of the site in spring of 2014 estimated vegetative cover to be approximately 95% the Diegan coastal sage scrub habitats, and 80% in the riparian areas. The site appeared dry during the annual monitoring with minimal plant mortality. Remnant signs and posts were observed and will be removed in the fall of 2014 after nesting season has concluded.

Mitigation Credits			
Habitat Type	Acres	Assigned	Balance
Riparian Forest	1.19	0.98	0.21
Southern Willow Scrub	0.42	0.42	0
Diegan Coastal Sage Scrub/Native Grassland	3.37	3.35	0.02





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**Tecolote Canyon Mitigation
Vicinity Map
Figure 7**

San Diego River Wetland Creation Project

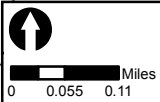
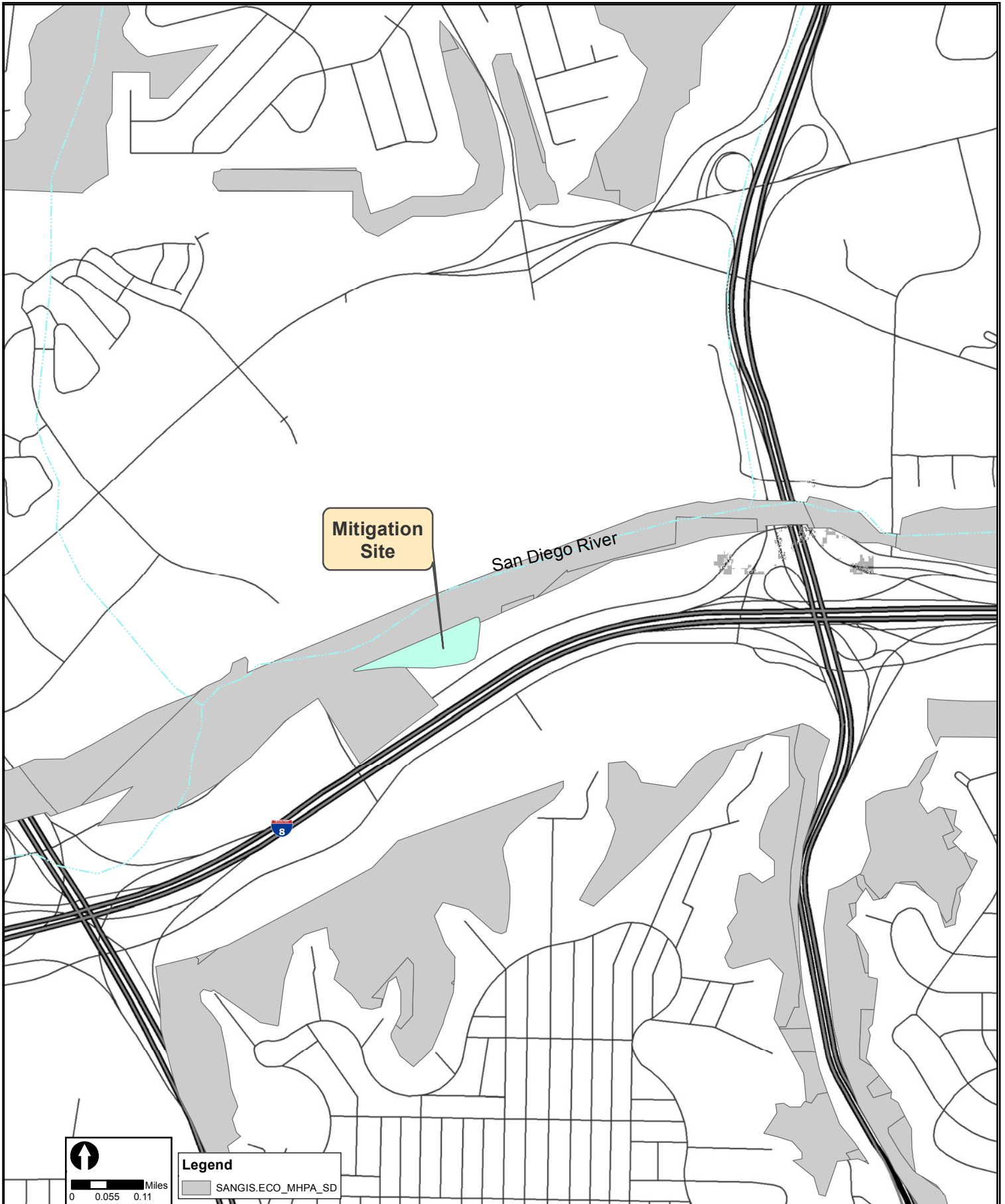
The San Diego River Wetland Creation Project is located on a Public Utilities owned parcel located immediately adjacent to the San Diego River, north of Camino Del Rio North, west of I-15, and east of Mission Center Parkway in the Mission Valley Community of the City of San Diego (Figure 8).

The site includes the creation of 3.43 acres of native riparian habitat and approximately 2 acres of Diegan coastal sage scrub habitat. The project site was graded in the fall of 2005 to create a basin along the southern bank of the San Diego River. The long-term maintenance, monitoring, and reporting program started June 14, 2006 and the site successfully completed 5-years of maintenance and monitoring in June of 2011. Native vegetation has established well with some wetland trees exceeding 20 feet in height. The wetland basin receives flows from the San Diego River during high water events (rainfall) which contributes nutrients and provides the necessary hydrology. Wildlife is using the site with numerous songbirds and animal tracks observed in the wetland area. Least Bell's vireo (*Vireo bellii pusillus*) were heard calling from the adjacent wetlands. A Multiple Habitat Planning Area (MHPA) boundary line adjustment was approved and finalized in 2012 which added the entire mitigation site into the MHPA.

During the most recent monitoring visit a transient trail and trash were observed along the northern edge of the site in the San Diego River. This trash will be removed following the end of the nesting season.

Mitigation Credits			
Habitat Type	Acres	Assigned	Balance
Southern Cottonwood Willow Riparian Forest	3.43	2.18	1.25





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**San Diego River Mitigation Project
 Vicinity Map
 Figure 8**

Los Peñasquitos North Wetland Creation Project

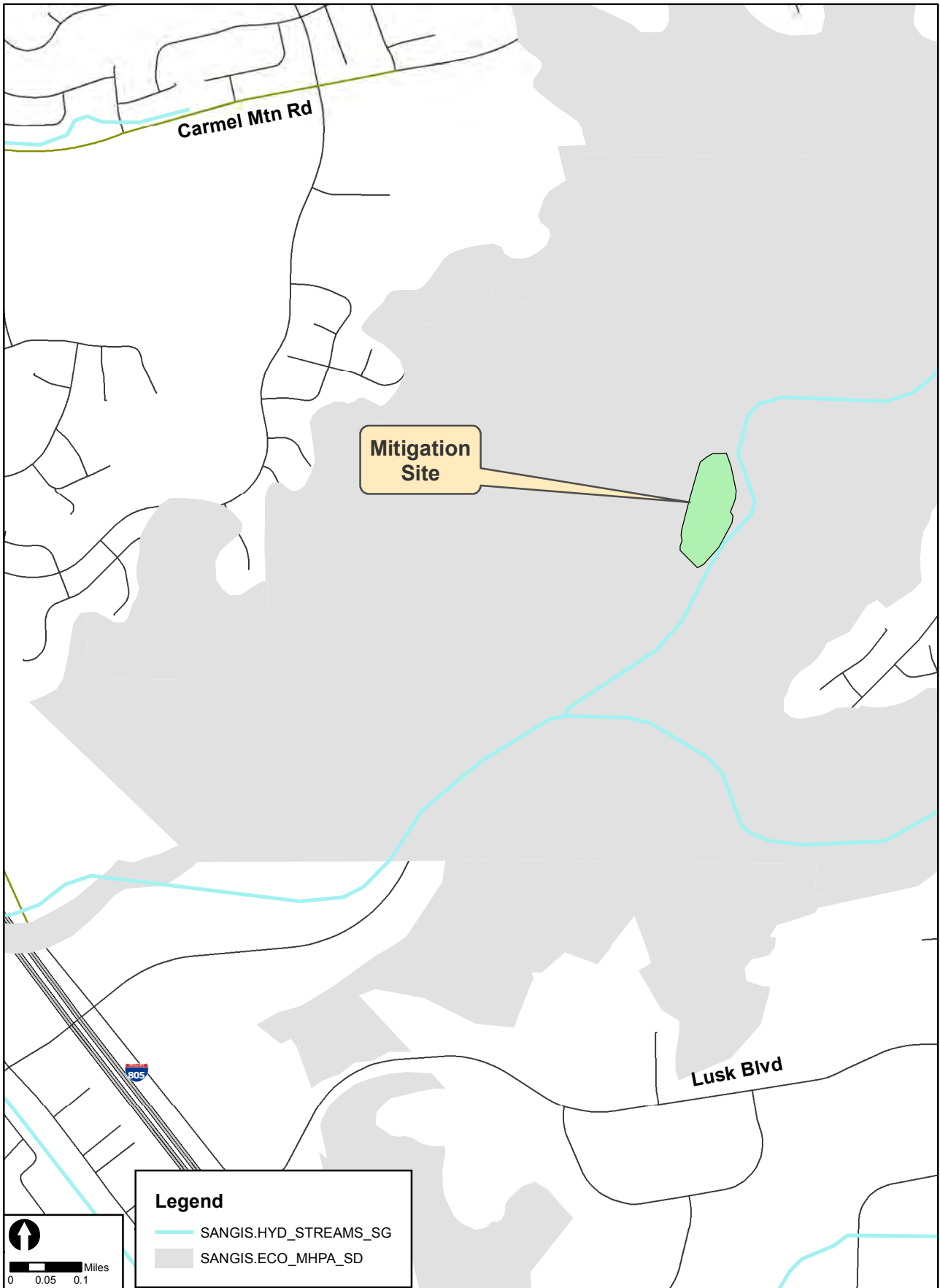
The Los Peñasquitos North Wetland Creation Project is located in the City of San Diego’s Los Peñasquitos Canyon Preserve in the community of Peñasquitos, just north of the Los Peñasquitos Creek (Figure 9).

The project includes the creation of 3.8 acres of wetland habitat, including 3.15 acres of southern willow scrub, 0.43 acres of cottonwood/sycamore woodland, and 0.22 acres of freshwater marsh. The site also includes one acre of Diegan coastal sage scrub habitat to serve as a buffer on the north edge of the site. Regulatory sign-off and approval for the project was received in the spring of 2012.

The site was assessed in May 2014 and appeared in good condition. Some willow die back was observed and can be expected in drought conditions. The site has trended towards lower growing marsh with continued deer (*Odocoileus* spp.) grazing keeping willow heights low. No trash or debris or unauthorized trails were observed onsite. A few pampas grass individuals were observed but have been treated with herbicide. The site meets the 5th year success standard with over 90% target vegetative cover. Vegetation within the wetland habitat is predominately spiny rush (*Juncus acutus*), deer grass (*Muhlenbergia rigens*) and various species of willows.

Mitigation Credits			
Habitat Type	Acres	Assigned	Balance
Riparian Scrub/Riparian Woodland/Freshwater Marsh	3.8	3.6	0.2
Diegan Coastal Sage Scrub	1.03	1.03	0





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**Los Penasquitos North Wetland Mitigation
 Vicinity Map
 Figure 9**

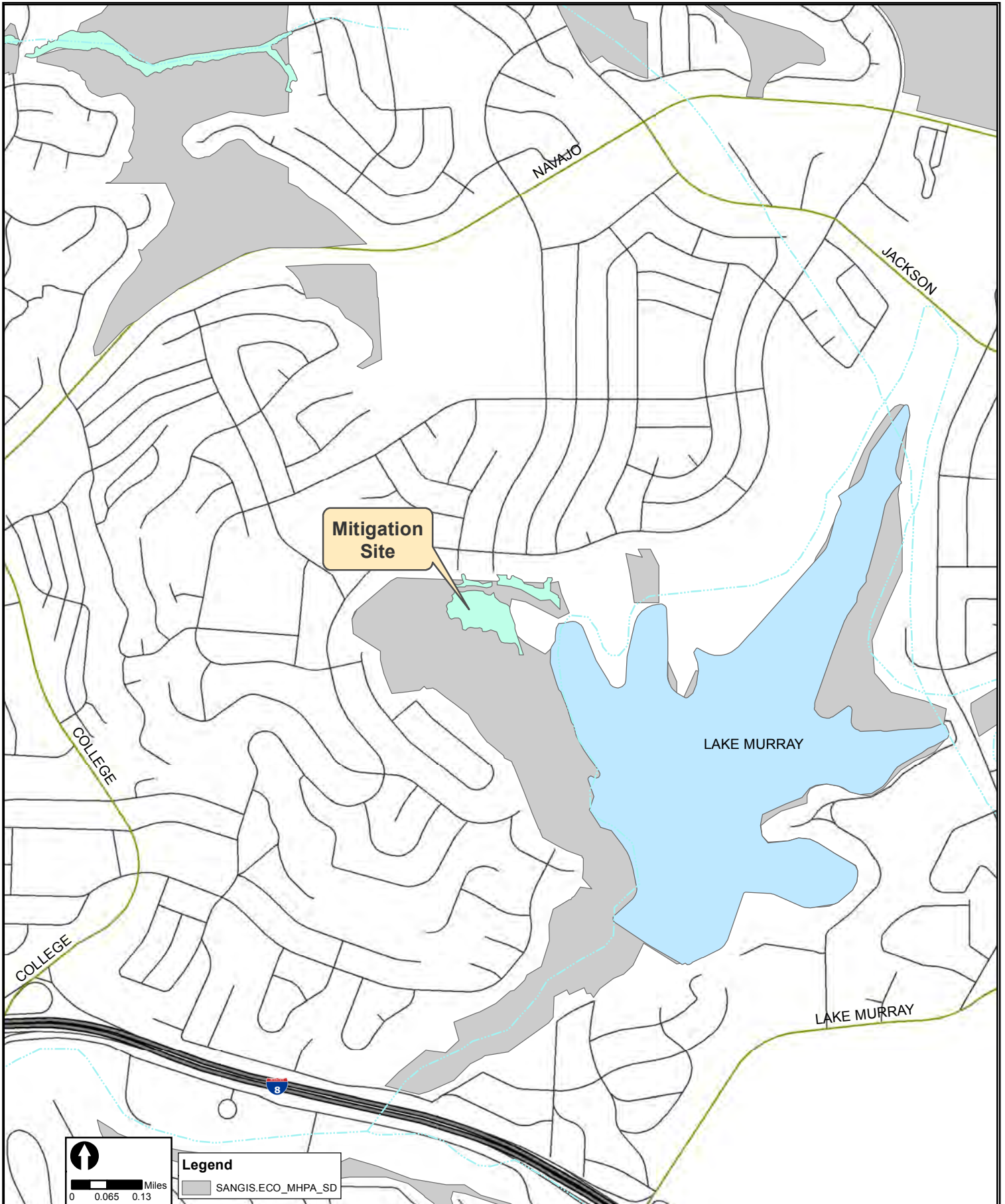
Lake Murray Mitigation Project

The Lake Murray Mitigation Project is in the City of San Diego’s Mission Trails Regional Park. It is located in the area just west of Lake Murray in the Del Cerro neighborhood of the Navajo Community (Figure 10). The mitigation site includes 2.5 acres of wetland enhancement (southern willow scrub habitat) and just over 5.2 acres of upland restoration area (Diegan coastal sage scrub). Official sign-off was received from all of the regulatory agencies by December 2011.

The annual assessment survey was conducted March 25, 2014 to assess the current condition of the mitigation site. Fifth year success criteria required an average combined cover of 90% for the upland restoration and wetland enhancement areas. The wetland enhancement area exceeds 100% native cover throughout most of the defined enhancement site. The wetland over story continues to mature, increasing in density and height with species such as Fremont cottonwood (*Populus fremontii*), Western sycamore (*Platanus racemosa*), and various types of willows reaching heights of 20 to 30 feet. The understory is diverse with species such as spiny rush, spike sedge (*Carex nardina*) evening primrose (*Oenothera elata*), San Diego marsh elder, and broad-leaved cattail (*Typha latifolia*). The upland restoration site has a mixture of Diegan coastal sage scrub and non-native grasslands. Species found within the Diegan coastal sage scrub include California sagebrush, lemonade berry (*Rhus integrifolia*), flattop buckwheat (*Erigeron fasciculatum*), laurel sumac (*Malosoma laurina*), fascicled tarweed (*Hemizonia fasciculata*), coast prickly-pear (*Opuntia littoralis*), and black sage (*Salvia mellifera*). A coyote (*Canas latrans*) and numerous California ground squirrels (*Otospermophilus beecheyi*) were observed using the upland site. A number of bird species were observed within the mitigation site, including California quail (*Callipepla californica*), California towhee (*Pipilo crissalis*), spotted towhee (*Pipilo maculatus*), lesser goldfinch (*Spinus psaltria*), mourning dove (*Zenaida macroura*), common yellowthroat (*Geothlypis trichas*), yellow-rumped warbler (*Dendroica coronata*), and Bewick’s wren (*Thryomanes bewickii*).

Mitigation Credits			
Habitat Type	Acres	Assigned	Balance
Southern Willow Scrub	2.5	1.56	0.94
Diegan Coastal Sage Scrub	5.2	4.99	0.21





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**Lake Murray Mitigation Project
Vicinity Map
Figure10**

El Rancho Peñasquitos Wetland Enhancement Project

The mitigation site is located along Los Peñasquitos Canyon approximately 0.5 mile west of Black Mountain Road in the vicinity of the historically designated Johnson Taylor Adobe of Rancho de los Peñasquitos (City of San Diego HRB Site #75). The site is within the MHPA on County and City of San Diego Open Space Land.

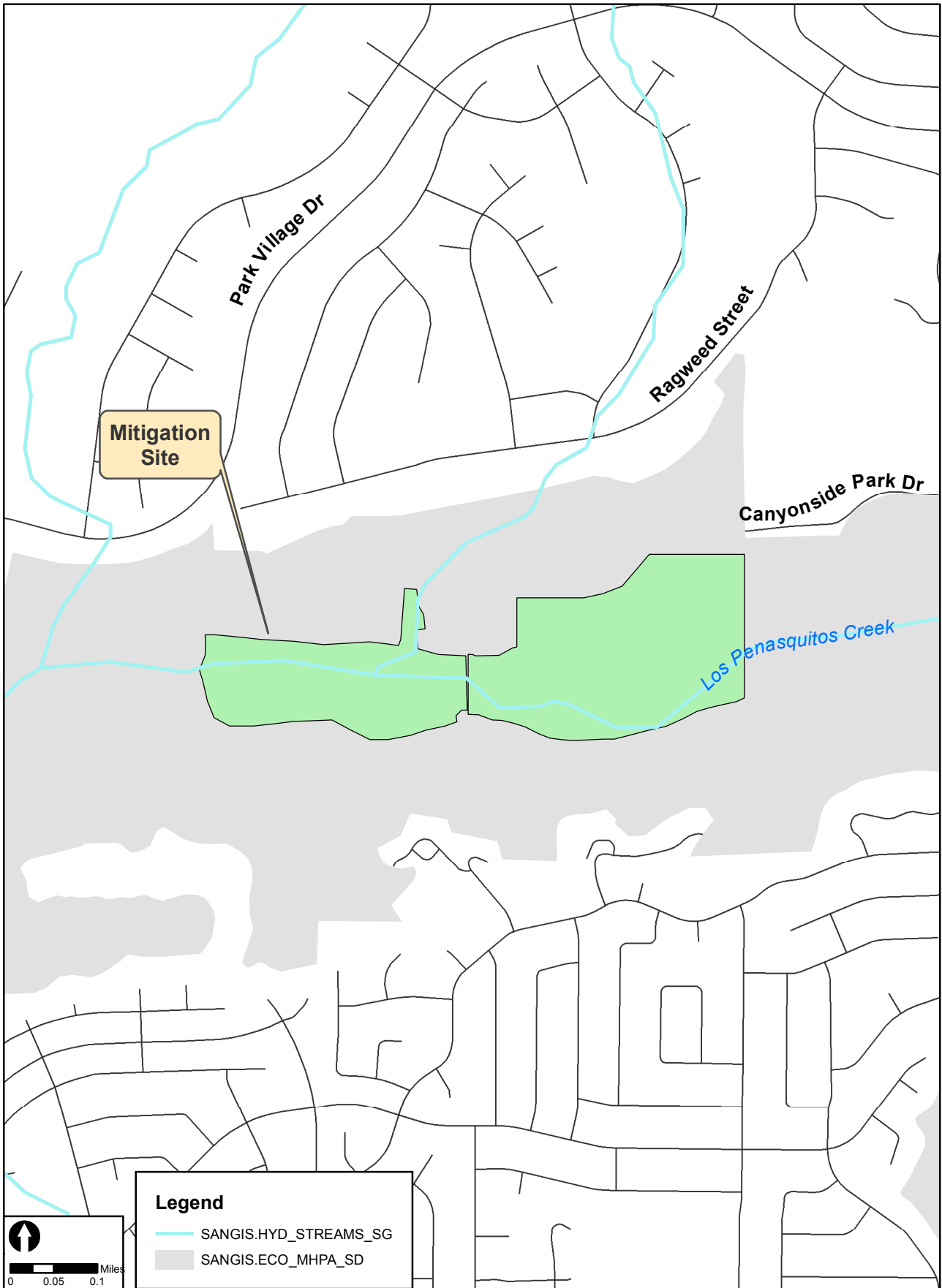
The El Rancho Project included enhancement of 5.53 acres of southern cottonwood willow riparian forest, by eradicating targeted non-native species. Project efforts began March 26, 2006 and regulatory sign-off was received in early 2010. This project treated 6,720 non-native plants, targeted species included Canary Island date palm, Mexican Fan Palm, Eucalyptus, Peruvian pepper tree (*Schinus terebinthifolius*), Brazilian pepper tree, and edible fig (*Ficus carica*).

The El Rancho Peñasquitos Wetland Enhancement Project has met the success criteria outlined in the Conceptual Mitigation Plan. During a site assessment in April 2014 a few non-native plants were observed within the project boundaries. Many of the larger treated plants have begun to deteriorate and decompose, allowing for the establishment of native species in their direct vicinity. Park and Recreation has taken over long term management of the site and manages the land consistent with the Multiple Species Conservation Plan which includes targeting the treatment or removal of invasive exotics as part of routine park management. Additional treatment of targeted species that have germinated or re-sprouted will continue.



Multiple species of birds were observed during the spring survey and included: Anna’s hummingbird (*Calypte anna*), California towhee, mourning dove, bushtit (*Psaltriparus minimus*), Nuttall’s woodpecker (*Picoides nuttallii*), black phoebe (*Sayornis nigricans*), Say’s phoebe (*Sayornis saya*), western scrub jay (*Aphelocoma coerulescens*), common raven (*Corvus corax*), red-tailed hawk (*Buteo jamaicensis*), hooded oriole (*Icterus cucullatus*), northern mocking bird (*Mimus polyglottos*), tree swallow (*Tachycineta bicolor*), and European starling (*Sturnus vulgaris*).

Mitigation Credits			
Habitat Type	Acres	Assigned	Balance
Riparian Forest	5.53	3.75	1.78



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**El Rancho Penasquitos Mitigation
 Vicinity Map
 Figure 11**

Rancho Bernardo Mitigation Project

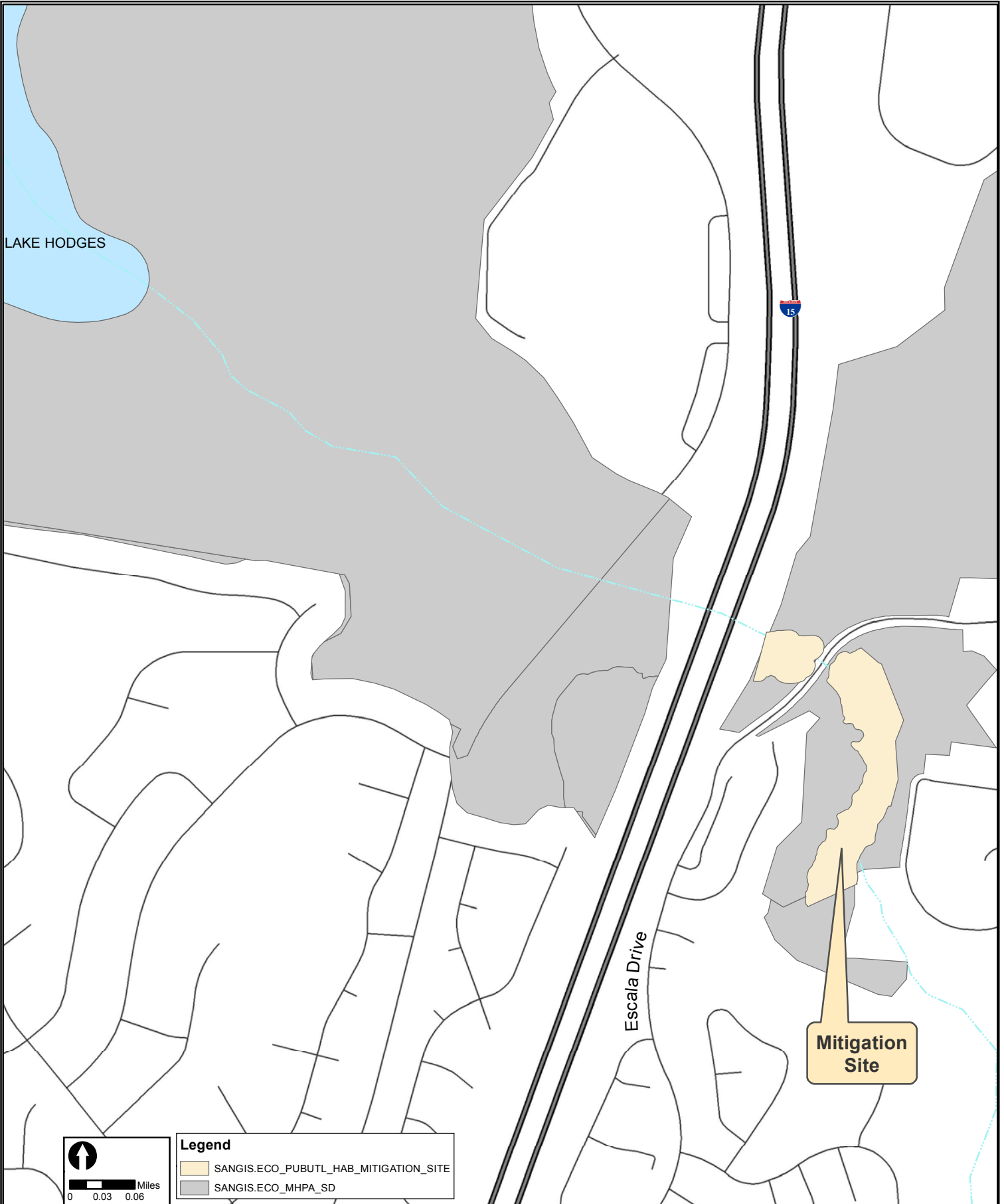
A conceptual mitigation plan has been prepared and approved by the ACOE and CDFW. The project would be located east of I-15, west of Cotorro Road and south of Escala Drive in Rancho Bernardo Canyon (Figure 12).



The project area currently supports a large area of non-native plant species that have little value for wildlife. The site currently supports California fan palms (*Washingtonia filifera*), pampas grass, castor bean (*Ricinus communis L.*), and tree tobacco (*Nicotiana glauca*). The goal of the mitigation project will be to eradicate all non-native plant species and establish native wetland habitat.

Public Utilities has postponed the implementation of this project and will reassess mitigation needs for this watershed on an annual basis. It is expected that the San Diego Association of Governments San Dieguito Wetland Mitigation Bank will be constructed and that credits will be purchased to satisfy wetland mitigation obligations for Public Utilities.



Rancho Bernardo Mitigation Project Site



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**Rancho Bernardo Mitigation Project
Vicinity Map
Figure 12**

Otay Mesa Upland Mitigation Bank

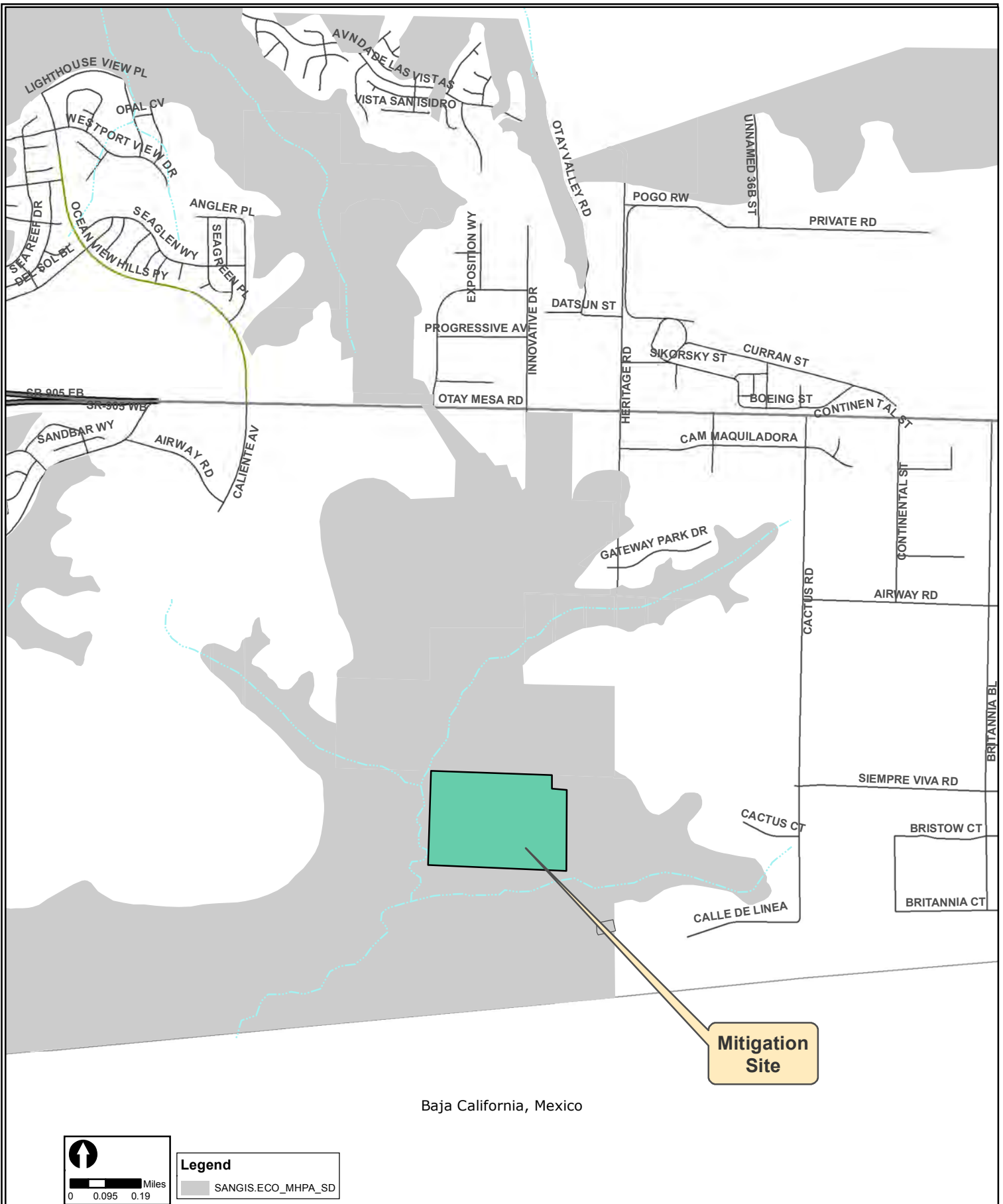
The Otay Mesa Mitigation Bank is located in the Otay Mesa community of the City of San Diego and occurs within the MHPA. The mitigation site is located on undeveloped land that is surrounded by other City of San Diego Park and Recreation Open Space lands and federal land holdings along the U.S /Mexico border. Five habitat types are found onsite and include maritime succulent scrub, non-native grasslands, ruderal, disturbed habitat, and vernal pool. Over 3,200 linear feet of fencing was installed at the site in February 2014 to reduce unauthorized off-road vehicle activity and protect sensitive habitat.

Sensitive plant species present onsite include San Diego button-celery (*Eryngium aristulatum* var. *parishii*), variegated dudleya (*Dudleya variegata*), snake cholla (*Opuntia parryi serpentina*), San Diego barrel cactus (*Ferocactus viridescens*), San Diego bur-sage (*Ambrosia chenopodiifolia*), south coast saltbush (*Atriplex pacifica*), and San Diego county viguiera (*Viguiera laciniata*). Notable animal species observed within the site include two pairs of coastal California gnatcatcher, burrowing owl (*Athene cunicularia*), northern harrier (*Circus cyaneus*), black tailed jackrabbit (*Lepus californicus*), orange-throated whiptail (*Aspidoscelis hyperythra*), coyotes, and bobcat (*Lynx rufus*).

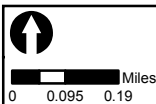
Mitigation Credits			
Habitat Type	Acres	Assigned	Balance
Maritime Succulent Scrub (Tier I)	45.43	33.94	11.49



San Diego Barrel Cactus



Baja California, Mexico



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**Otay Mesa Upland Mitigation Bank
 Vicinity Map
 Figure 13**

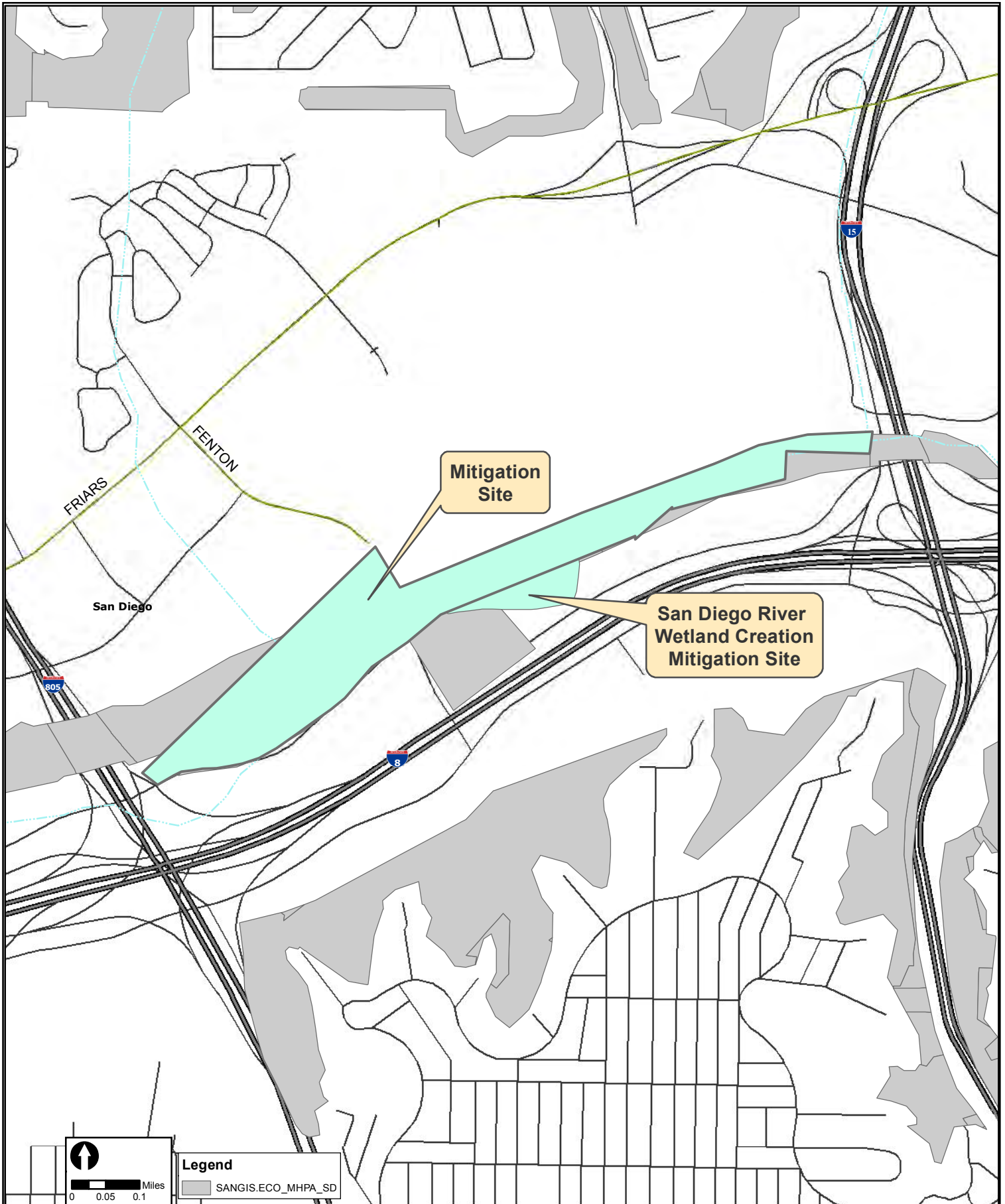
Stadium Wetland Mitigation Project

A conceptual mitigation plan has been prepared for this project and submitted to the resource agencies for their review. Pending approval by the resource agencies, work at the site is proposed to begin in the fall of 2015.

The Stadium Wetland Mitigation Project is located within the floodplain of the San Diego River between I-15 and I-805. The site is approximately 65 acres and currently dominated by a high number of non-native species including giant reed (*Arrundo donax*), Peruvian pepper tree, Brazilian pepper tree, pampas grass, Canary Island date palm, eucalyptus. This project proposes to restore native habitat to the area by removing targeted non-native species, installing native plants, and maintaining and monitoring the site for a minimum of 5-years.

This site has the potential to provide high quality habitat for a number of regionally sensitive species including least Bell's Vireo, southwestern willow flycatcher (*Empidonax traillii extimus*), western pond turtle (*Actinemys marmorata*), yellow billed cuckoo (*Coccyzus americanus*), and two-striped garter snake (*Thamnophis hammondi*), and also improve water quality, and functionality of the San Diego River.





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**Stadium Wetland Mitigation Project
Vicinity Map
Figure 14**

ATTACHMENT A –
25 MONTH REVEGETATION AND RESTORATION PROJECTS STATUS TABLE




**Canyon Restoration/Revegetation Projects (2010-2014)
July 2014**



Active Projects								
Canyon/Project	Reveg or Restoration*	Size (acre)	Start of 25 Months	Seeding Date	Planting Date	End of 25 Months	PM	Status
Mission Center Canyon	Restoration	0.22	4/29/2011	10/1/2011	N/A	5/29/2014	Tran	Additional maintenance being conducted – new completion date is 10/2014
Euclid and Menlo Restoration	Restoration	0.20	11/16/2011	9/10/2011	11/17/2011	12/16/2013	Smith	Additional maintenance was conducted. Site met success standards; requesting sign-off
Lakeside Ave Emergency (Water)	Revegetation	0.30	4/15/2012	4/9/2012	06/14/2012	07/14/2014	Paver	In 25 Month Maintenance
Alta View Water Emergency (Water)	Restoration	0.04	7/13/2012	7/13/2012	N/A	08/13/2014	Adleberg	25 months Monitoring
Buchanan Canyon MH 31	Revegetation	0.03	9/2012	9/7/2012	N/A	10/2014	Adleberg	25 months Monitoring
Imperial and Woodman	Revegetation	0.05	9/2012	N/A	N/A	10/2014	Adleberg	25 months Monitoring
Casita Way Sewer Repairs	Restoration	<0.01	11/4/2012	11/14/2012	N/A	12/14/2014	Smith	25 Month Monitoring
Mission Ave Spot Repair	Revegetation	0.01	11/21/2012	11/21/2012	N/A	12/21/2014	Adleberg	25 Month Monitoring
Manzanita/Lex Water Break (Water)	Restoration	0.10	11/29/2012	8/22/2012	11/29/2012	12/29/2014	Paver	25 Months Maintenance by D&D
Manzanita Sewer Emergency	Revegetation	0.02	11/29/2012	8/22/2012	N/A	12/29/2014	Paver	25 Month Monitoring
Middle Rose MH 160 and Lower MH9	Restoration	0.04	12/5/2012	11/30/2012	12/5/2012	1/5/2015	Van Every	Planted and maintained by Merkel. In 25 month maintenance period.
Stevenson MH 257 Emergency	Revegetation	0.08	12/6/2012	12/6/2012	N/A	1/6/2015	Paver	25 Month Monitoring
Fay Ave/Draper Street	Revegetation	<0.01	6/1/2013	N/A	N/A	7/1/2015	Adleberg	25 Month Monitoring
Ocean Blvd	Restoration	0.01	2/15/2013	N/A	N/A	3/15/2015	Paver	25 Month Monitoring
Wellington Spot Repairs	Revegetation	<0.01	10/14/2013	N/A	N/A	11/14/2015	Paver	25 Month Monitoring
Mission Gorge Pipe Protection	Restoration	0.07	11/1/2013	N/A	N/A	12/1/2015	Balo	25 Month Monitoring
Otay Pipe Protection	Restoration	0.29	11/2013	11/2013	N/A	11/2015	Lavan	25 month monitoring period
Famosa Slough Pipe Repair	Revegetation	<0.01	11/15/2013	N/A	N/A	12/15/2015	Paver	25 Month Monitoring
Spruce Mh 220 Emergency	Revegetation	<0.01	11/25/2013	1/11/2014	N/A	12/25/2015	Paver	25 Month Monitoring
Rancho Mission LT Streambed	Reveg/Rest	0.21	3/2014	3/19/2014	TBD	4/2016	VanEvery	Construction Complete, hydroseeding pending
Hawk Street Slope Repair (Water)	Revegetation	0.06	1/24/2014	2/20/2014	N/A	3/2016	Smith	25 Month Monitoring
Buchanan Emergency	Reveg/Rest	0.8	TBD	2/2014	TBD	TBD	Adleberg	Hydroseeding Complete. Plant in Fall 2014
PS 77 Force Main Inspection	Restoration	0.387	2/15/2014	10/23/2013	N/A	3/15/2016	Smith	25 Month Maintenance and Monitoring
36 inch Water Pipe Repair Blck Mtn (Water)	Reveg	0.14	5/13/2014	5/13/2014	N/A	6/13/2016	Paver	Construction Complete. Seeding TBD
Manzanita Water Break II (Water)	Restoration	0.05	6/19/2014	7/8/2014	6/19/2014	7/19/2016	Paver	25 Month Monitoring
Washington Creek Path Maint	Revegetation	0.037	5/27/2014	N/A	N/A	6/27/2016	Lavan	25 Month Monitoring

Completed Projects				
Canyon/Project	Revegetation or Restoration	Project Initiation	Project Completion	PM
Rose (MH 476)	Revegetation/Restoration	11/2008	6/28/2014	Paver
Rose Sinkhole	Revegetation/Restoration	5/23/2011	6/28/2014	Paver
Hotel Circle South Emergency	Restoration	11/9/2011	6/28/2014	Paver
Chollas YMCA	Revegetation	1/18/2012	6/28/2014	Paver
Keighley Street	Revegetation	12/9/2011	2/2014	Balo
Nobel Drive Sewer Repair	Restoration	2/25/2013	2/2014	Paver
Lexington Water Emer (Water)	Restoration	1/2011	1/2014	Balo
Dulzura Flume (Water)	Restoration	9/10/2013	1/2014	Balo
Upas Street	Revegetation	9/29/2011	1/2014	Smith
Dwane and Elaine	Restoration	6/29/2011	9/2013	Smith
Admiral Baker	Revegetation	7/21/2011	9/2013	Balo
East Tecolote	Restoration	11/24/2010	7/2013	White
Carmel Valley Rd (Water)	Revegetation	5/20/2011	7/2013	Balo
Central Tecolote MH 159	Revegetation	5/9/2011	7/2013	Balo
Plaza Ridge (Water)	Revegetation	1/19/2011	5/2013	Smith
33 rd and Maple	Revegetation	3/16/2011	5/2013	Smith
Lake Murray (Water)	Restoration	1/2011	3/2013	Balo
San Clemente Emergency	Revegetation	1/2011	3/2013	Balo
San Clemente MH 4 Access	Revegetation	2/2011	3/2013	Balo
Menlo and Redwood	Restoration	11/2010	3/2013	Smith
Rancho Mission Slope	Restoration	6/10/2010	10/2012	Balo
Lake Hodges	Restoration	7/1/2010	10/2012	Domasco
Oklahoma Street	Restoration	5/3/2010	8/2012	Domasco
Lopez MH 102	Restoration	5/2010	8/2012	Domasco
Valeta Street	Revegetation	5/3/2010	8/2012	Santos
PS 30	Restoration	4/20/2010	5/20/2012	Van Every
South Juniper	Reveg/Rest	11/2009	2/9/2012	Domasco
Tecolote MH 346	Restoration	9/2009	11/2011	Domasco
San Pasqual Pipe Repair	Erosion Control	4/5/2007	9/18/2011	Balo
7 th and Brookes	Reveg/Rest	11/2008	9/18/2011	Domasco
Washington Creek	Erosion Control	2/1/2008	4/30/2011	Balo
Switzer	Reveg/Rest	11/2008	4/30/2011	Domasco
Mt Ashmun	Reveg/Restoration	10/2009	4/30/2011	Domasco
Lexington (Jaimes Way)	Reveg/Restoration	1/2009	4/30/2011	Balo
Dakota	Reveg/Rest	9/2008	11/26/2010	Domasco
Miramar TS	Reveg/Rest	10/28/2007	9/26/2010	White
Buchanan/Maryland St	Restoration	1/15/2008	4/22/2010	White
Fairmount and Home	Reveg/Rest	5/31/05	4/22/2010	White
Norfolk	Reveg/Rest	10/19/07	4/22/2010	Balo
Juniper and 28 th	Reveg	2/15/2008	4/22/2010	Balo

ATTACHMENT B –
MITIGATION SUMMARY TABLE



Wednesday, July 23, 2014
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Mitigation Site Name	Mitigation Type	Site Size (Acres)	Acres Used	Balance (Acres)
Camino del Rio North - San Diego River Creation	Wetland Creation	3.43	2.1742	1.2558
Canyon View (Penasquitos Upland)	Upland Restoration	7.38	1.641	5.739
Central Tecolote Enhancement/Mitigation	Upland Restoration	3.05	0.717	2.333
Central Tecolote Enhancement/Mitigation	Wetland Enhancement	7.95	2.4286	5.5214
El Cuervo Norte	Wetland Creation	0.72	0.637	0.083
El Cuervo Norte	Wetland Enhancement	0.68	0.669	0.011
El Rancho (Penasquitos Enhancement)	Wetland Enhancement	5.53	3.7548	1.7752
Lake Murray	Wetland Enhancement	2.5	1.5624	0.9376
Lake Murray	Upland Restoration	5.2	4.9936	0.2064
Los Penasquitos North	Upland Restoration	1.03	1.03	0
Los Penasquitos North	Wetland Creation	3.8	3.5974	0.2026
Marron Valley Cornerstone Lands Conservation Ba	Upland Bank	7.545	6.883	0.662
Otay Mesa Mitigation Bank	Upland Bank	13.24	1.754	11.486
Penasquitos Eucalyptus Removal	Wetland Enhancement	0.31	0.31	0
Rancho Mission Enhancement	Wetland Enhancement	8.74	2.1326	6.6074
Rose Canyon Wetland and Upland	Wetland Enhancement	0.61	0.35	0.26
Rose Canyon Wetland and Upland	Upland Restoration	5.03	3.148	1.882
Rose Canyon Wetland and Upland	Wetland Creation	5.05	3.4398	1.6102
San Clemente Wetland and Upland	Wetland Creation	2.86	2.064	0.796
San Clemente Wetland and Upland	Upland Restoration	2.81	2.088	0.722
Tecolote - Tree of Heaven removal	Wetland Enhancement	0.25	0.25	0
Tecolote Canyon Wetland and Upland	Wetland Creation	1.61	1.396	0.214
Tecolote Canyon Wetland and Upland	Upland Restoration	3.37	3.3548	0.0152
TOTALS		92.695	50.3752	42.3198

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ATTACHMENT C –
MITIGATION ASSIGNMENT SUMMARY TABLE



City of San Diego Public Utilities Department Mitigation Projects



Camino del Rio North - San Diego River Creation

Impact Project	Mitigation Type	Habitat Type	Acreage	Location	Impact Date
wetland					
15 West and Elanus	Wetland Creation	SWS	0.05	Off-site in watershed	12/19/2003
32nd Street - Huckleberry LT	Wetland Creation	DWET	0.04	Off-site out of watershed	1/1/2010
32nd Street - Huckleberry LT	Wetland Creation	NVC	0.009	Off-site out of watershed	1/1/2010
54th & Maisel	Wetland Creation	FM	0.008	Off-site in watershed	7/2/2001
60th Street Pipe Relocation/Permanent Access	Wetland Creation	DWET	0.005	Off-site in watershed	
Alvarado Court Emergency Sewer Repair	Wetland Creation	SWS	0.016	Off-site in watershed	10/5/1998
Alvarado Court Emergency Sewer Repair	Wetland Creation	FM	0.08	Off-site in watershed	10/5/1998
Alvarado Court Sewer Crossing	Wetland Creation	NVC	0.002	Off-site in watershed	
Alvarado Court Sewer Crossing	Wetland Creation	SWS	0.005	Off-site in watershed	
Alvarado LT	Wetland Creation	MFS	0.01	Off-site in watershed	
Alvarado LT	Wetland Creation	DWET	0.01	Off-site in watershed	
Alvarado Trunk Sewer	Wetland Creation	DWET	0.022	Off-site in watershed	
Buchanan	Wetland Creation	SWS	0.0108	Off-site in watershed	3/11/2002
Buchanan	Wetland Creation	DWET	0.322	Off-site in watershed	3/11/2002
Buchanan Group Job 689	Wetland Creation	NVC	0.009	Off-site in watershed	
Buchanan LT	Wetland Creation	DWET	0.06	Off-site in watershed	1/1/2004
Buchanan Sewer Blockage Emergency	Wetland Creation	SWS	0.011	Off-site in watershed	12/2/2013
Chocolate Access MH 273 to 267	Wetland Creation	EW	0.0064	Off-site out of watershed	
Chollas Dam Vegetation Removal	Wetland Creation	FM	0.022	Off-site out of watershed	1/22/2013
Chollas Exposed Water Main Repair	Wetland Creation	RS	0.014	Off-site out of watershed	8/30/2011

Camino del Rio North - San Diego River Creation

Impact Project	Mitigation Type	Habitat Type	Acreage	Location	Impact Date
Dove Canyon Emergency Repair	Wetland Creation	NVC	0.001	Off-site in watershed	10/22/2010
Elanus & Murray Canyons (I-15 & Clairemont Mesa Bl	Wetland Creation	SWS	0.007	Off-site in watershed	12/11/2002
Elanus (I-15 & Clairemont Mesa Blvd) LT	Wetland Creation	EW	0.005	Off-site in watershed	
Euclid & Menlo (3343 Menlo Ave Spalsh Apron	Wetland Creation	NVC	0.004	Off-site out of watershed	3/8/2004
Euclid & Menlo (47th & Thorn Sewer Maint & Emerg)	Wetland Creation	DWET	0.08	Off-site out of watershed	2/1/2004
Federal & Chollas	Wetland Creation	DWET	0.0008	Off-site out of watershed	10/22/2002
Fox Canyon (University & 49th) Emergency Repair	Wetland Creation	NVC	0.002	Off-site out of watershed	10/29/2007
Hopkins	Wetland Creation	DWET	0.02	Off-site out of watershed	3/17/2004
Hopkins (Calle Abajo Emergency)	Wetland Creation	NVC	0.002	Off-site out of watershed	4/3/2002
Huckleberry (32nd St Canyon Emergency Maintenance)	Wetland Creation	DWET	0.04	Off-site out of watershed	7/21/2003
I-15 & Adams	Wetland Creation	EW	0.004	Off-site in watershed	5/6/2004
Junipero Serra (Jackson/Mission Gorge Emergency)	Wetland Creation	SWS	0.01	Off-site in watershed	11/13/2002
Junipero Serra (Mission Gorge Emergency Repair)	Wetland Creation	SWS	0.03	Off-site in watershed	12/11/2001
Junipero Serra (Superior Ready Mix Emergency Repai	Wetland Creation	SWS	0.3	Off-site in watershed	1/26/2002
Junipero Serra (Superior Ready Mix Emergency Repai	Wetland Creation	SCWRF	0.09	Off-site in watershed	1/26/2002
Lake Murray Emergency Cleaning	Wetland Creation	SWS	0.01	Off-site in watershed	12/1/2002
Lake Murray Trunk Sewer and Permanent Access Path	Wetland Creation	FM	0.07	Off-site in watershed	
Lake Murray Trunk Sewer and Permanent Access Path	Wetland Creation	SWS	0.2	Off-site in watershed	
Lexington Long-Term Access	Wetland Creation	NVC	0.08	Off-site out of watershed	
Market & Euclid (MH 88 Repair at Encanto Creek)	Wetland Creation	SWS	0.003	Off-site out of watershed	10/22/2009
Mission Center Canyon B	Wetland Creation	NVC	0.035	Off-site in watershed	1/1/2011
Mission Center Canyon B	Wetland Creation	EW	0.02	Off-site in watershed	1/1/2011
Mission Center Canyon B	Wetland Creation	DWET	0.014	Off-site in watershed	1/1/2011
Mission Center Canyon B	Wetland Creation	RS	0.025	Off-site in watershed	1/1/2011

Camino del Rio North - San Diego River Creation

Impact Project	Mitigation Type	Habitat Type	Acreage	Location	Impact Date
Mission Center Canyon Emergency Sewer Repair	Wetland Creation	FM	0.023	Off-site in watershed	3/10/2010
Mission Center Canyon Emergency Sewer Repair	Wetland Creation	SWS	0.004	Off-site in watershed	3/10/2010
Mission Center Rd. (Kearny Mesa)	Wetland Creation	SWS	0.007	Off-site in watershed	1/13/2002
Murphy Canyon TS Access and Repair	Wetland Creation	FM	0.051	Off-site in watershed	
Norfolk (Fairmont & Montezuma)	Wetland Creation	SWS	0.003	Off-site in watershed	4/22/2002
Norfolk LT	Wetland Creation	NVC	0.005	Off-site in watershed	7/1/2004
Otay Valley TS Pipe Protection	Wetland Creation	NVC	0.018	Off-site out of watershed	9/16/2013
Presidio (Palm Cyn) GJ665	Wetland Creation	NVC	0.0137	Off-site in watershed	
Presidio (Palm Cyn) GJ665	Wetland Creation	RS	0.165	Off-site in watershed	
Rancho Mission (Mission Gorge Canyon, Conestoga Co	Wetland Creation	DWET	0.005	Off-site in watershed	2/7/2002
Rancho Mission LT	Wetland Creation	SWS	0.007	Off-site in watershed	11/12/2013
Rancho Mission LT	Wetland Creation	NVC	0.007	Off-site in watershed	11/12/2013
San Diego Mission Rd Emergency	Wetland Creation	SWS	0.01	Off-site in watershed	7/9/2011
San Diego Mission Rd Emergency	Wetland Creation	FM	0.01	Off-site in watershed	7/9/2011
Shepherd	Wetland Creation	SWS	0.01	Off-site in watershed	2/1/2003
Shepherd LT	Wetland Creation	RS	0.02	Off-site in watershed	
Shepherd LT	Wetland Creation	DWET	0.015	Off-site in watershed	
Shepherd LT	Wetland Creation	RW	0.03	Off-site in watershed	
South Chollas LTA	Wetland Creation	MFS	0.0015	Off-site out of watershed	
Valencia Canyon Emergency Repair & Maintenance	Wetland Creation	MFS	0.004	Off-site out of watershed	1/25/2003
Total Mitigation Acres:			2.1742 acres		

Canyon View (Penasquitos Upland)

Impact Project	Mitigation Type	Habitat Type	Acreage	Location	Impact Date
upland					

Canyon View (Penasquitos Upland)

Impact Project	Mitigation Type	Habitat Type	Acreage	Location	Impact Date
Black Mtn Access Rd Repair	Upland Restoration	DCSS	0.19	In-canyon	
Lopez Canyon LT	Upland Restoration	NNG	0.013	In-canyon	
Lopez Canyon LT	Upland Restoration	DCSS	0.3	In-canyon	
Lopez Emergency Cleaning	Upland Restoration	NNG	0.05	In-canyon	2/13/2005
Lopez Emergency Cleaning	Upland Restoration	SOC	0.02	In-canyon	2/13/2005
Lopez Emergency Cleaning	Upland Restoration	SMC	0.01	In-canyon	2/13/2005
Lopez Emergency Cleaning	Upland Restoration	DCSS	0.51	In-canyon	2/13/2005
Lopez MH 102 Emergency	Upland Restoration	DCSS	0.022	In-canyon	12/18/2009
Penasquitos Lagoon Mh 190 Access	Upland Restoration	DCSS	0.006	Off-site in watershed	11/20/2013
Penasquitos Views Trunk Sewer	Upland Restoration	DCSS	0.52	In-canyon	
Total Mitigation Acres:			1.641 acres		

Central Tecolote Enhancement/Mitigation

Impact Project	Mitigation Type	Habitat Type	Acreage	Location	Impact Date
upland					
East Tecolote Canyon Pipe Encasemt Protection Proj	Upland Restoration	NNG	0.02	In-canyon	10/4/2010
East Tecolote Canyon Pipe Encasemt Protection Proj	Upland Restoration	NG	0.002	In-canyon	10/4/2010
East Tecolote Canyon Pipe Encasemt Protection Proj	Upland Restoration	CLOW	0.022	In-canyon	10/4/2010
Tecolote LT	Upland Restoration	MSS	0.02	In-canyon	
Tecolote LT	Upland Restoration	CLOW	0.06	In-canyon	
Tecolote LT	Upland Restoration	POS	0.09	In-canyon	
Tecolote LT	Upland Restoration	DCSS	0.453	In-canyon	
Tecolote LT	Upland Restoration	SMC	0.05	In-canyon	
Tecolote LT	Upland Restoration	SOC	0	In-canyon	
Total Mitigation Acres:			0.717 acres		

Central Tecolote Enhancement/Mitigation

Impact Project	Mitigation Type	Habitat Type	Acreage	Location	Impact Date
wetland					
East Tecolote (East Clairemont)	Wetland Enhancement	SWS	0.0001	In-canyon	1/8/2002
East Tecolote (East Clairemont)	Wetland Enhancement	SRF	0.008	In-canyon	1/8/2002
East Tecolote (East Clairemont) LT	Wetland Enhancement	FM	0.014	In-canyon	
East Tecolote (East Clairemont) LT	Wetland Enhancement	SRF	0.458	In-canyon	
East Tecolote (East Clairemont) LT	Wetland Enhancement	SWS	0.039	In-canyon	
East Tecolote Canyon Pipe Encasemt Protection Proj	Wetland Enhancement	SRF	0.06	In-canyon	10/4/2010
East Tecolote Canyon Pipe Encasemt Protection Proj	Wetland Enhancement	SWS	0.036	In-canyon	10/4/2010
East Tecolote Canyon Pipe Encasemt Protection Proj	Wetland Enhancement	OW	0.023	In-canyon	10/4/2010
East Tecolote Emergency MH 218	Wetland Enhancement	SRF	0.096	In-canyon	2/8/2010
East Tecolote Manholes 223 and 224 Emergency	Wetland Enhancement	OW	0.015	In-canyon	12/16/2009
East Tecolote Manholes 223 and 224 Emergency	Wetland Enhancement	FM	0.039	In-canyon	12/16/2009
East Tecolote Manholes 223 and 224 Emergency	Wetland Enhancement	SWS	0.033	In-canyon	12/16/2009
East Tecolote Manholes 223 and 224 Emergency	Wetland Enhancement	SRF	0.068	In-canyon	12/16/2009
Park Mesa Way	Wetland Enhancement	SWS	0.15	In-canyon	1/13/2000
Tecolote (including Mt. Elbrus)	Wetland Enhancement	SWS	0.13	In-canyon	11/18/2002
Tecolote (including Mt. Elbrus)	Wetland Enhancement	SCLORF	0.4	In-canyon	11/18/2002
Tecolote Emergency Pipe Repair (Crossing)	Wetland Enhancement	EW	0.002	In-canyon	12/13/2004
Tecolote Emergency Pipe Repair (Crossing)	Wetland Enhancement	SWS	0.008	In-canyon	12/13/2004
Tecolote Emergency Pipe Repair (Crossing)	Wetland Enhancement	SCLORF	0.004	In-canyon	12/13/2004
Tecolote LT	Wetland Enhancement	SWS	0.03	In-canyon	
Tecolote LT	Wetland Enhancement	MFS	0.01	In-canyon	
Tecolote LT	Wetland Enhancement	NVC	0.02	In-canyon	
Tecolote LT	Wetland Enhancement	SRF	0.682	In-canyon	

Central Tecolote Enhancement/Mitigation

Impact Project	Mitigation Type	Habitat Type	Acreage	Location	Impact Date
Tecolote MH 101 Emergency	Wetland Enhancement	MFS	0.0005	In-canyon	4/5/2010
Tecolote Mt. Ashmun Pipe Protection Emergency	Wetland Enhancement	NVC	0.001	In-canyon	1/17/2008
Tecolote Mt. Ashmun Pipe Protection Emergency	Wetland Enhancement	NVC	0.007	In-canyon	1/17/2008
Tecolote Mt. Ashmun Pipe Protection Emergency	Wetland Enhancement	RF	0.02	In-canyon	1/17/2008
Tecolote Mt. Ashmun Pipe Protection Erosion Contro	Wetland Enhancement	SWS	0.001	In-canyon	9/9/2009
Tecolote Mt. Ashmun Pipe Protection Erosion Contro	Wetland Enhancement	RF	0.004	In-canyon	9/9/2009
Tecolote Pipe Repair Near Manhole 346	Wetland Enhancement	SRF	0.07	In-canyon	8/17/2009
Total Mitigation Acres:			2.4286 acres		

El Cuervo Norte

Impact Project	Mitigation Type	Habitat Type	Acreage	Location	Impact Date
wetland					
Acuna	Wetland Creation	SWS	0.08	Off-site in watershed	3/11/2002
Acuna	Wetland Creation	MFS	0.002	Off-site in watershed	3/11/2002
Acuna	Wetland Enhancement	SWS	0.08	Off-site in watershed	3/11/2002
Acuna	Wetland Enhancement	MFS	0.002	Off-site in watershed	3/11/2002
Acuna	Wetland Creation	DWET	0.04	Off-site in watershed	3/11/2002
Acuna	Wetland Enhancement	DWET	0.04	Off-site in watershed	3/11/2002
Acuna Street Emergency	Wetland Enhancement	SWS	0.04	Off-site in watershed	7/6/1998
Acuna Street Emergency	Wetland Creation	SWS	0.04	Off-site in watershed	7/6/1998
Penasquitos Bluffs (Finger Canyon Emergency)	Wetland Enhancement	CVFM	0.06	In-canyon	11/1/2000
Penasquitos Bluffs (Finger Canyon Emergency)	Wetland Creation	CVFM	0.06	Off-site in watershed	11/1/2000
Penasquitos Bluffs (Finger Canyon Emergency)	Wetland Enhancement	SWS	0.02	In-canyon	11/1/2000
Penasquitos Bluffs (Finger Canyon Emergency)	Wetland Creation	SWS	0.02	Off-site in watershed	11/1/2000
San Clemente (Emergency Repairs Combined)	Wetland Enhancement	RW	0.104	Off-site in watershed	9/1/2001

El Cuervo Norte

Impact Project	Mitigation Type	Habitat Type	Acreage	Location	Impact Date
San Clemente (Emergency Repairs Combined)	Wetland Creation	MFS	0.02	Off-site in watershed	9/1/2001
San Clemente (Emergency Repairs Combined)	Wetland Enhancement	SWS	0.003	Off-site in watershed	9/1/2001
San Clemente (Emergency Repairs Combined)	Wetland Enhancement	MFS	0.02	Off-site in watershed	9/1/2001
San Clemente (Emergency Repairs Combined)	Wetland Creation	RW	0.052	Off-site in watershed	9/1/2001
San Clemente (Emergency Repairs Combined)	Wetland Creation	SWS	0.003	Off-site in watershed	9/1/2001
Stevenson	Wetland Creation	MFS	0.02	Off-site in watershed	8/8/2001
Stevenson	Wetland Enhancement	MFS	0.02	Off-site in watershed	8/8/2001
Stevenson	Wetland Enhancement	SWS	0.28	Off-site in watershed	8/8/2001
Stevenson	Wetland Creation	SWS	0.28	Off-site in watershed	8/8/2001
Torreyana Sewer Repair	Wetland Creation	NVC	0.02	Off-site in watershed	10/1/2001
Total Mitigation Acres:			1.306 acres		

El Rancho (Penasquitos Enhancement)

Impact Project	Mitigation Type	Habitat Type	Acreage	Location	Impact Date
wetland					
Acuna LT	Wetland Enhancement	DWET	0.01	Off-site in watershed	2/1/2005
Balboa Terrace Trunk Sewer Replacement	Wetland Enhancement	MFS	0.022	Off-site in watershed	9/16/2012
Balboa Terrace Trunk Sewer Replacement	Wetland Enhancement	SWS	0.064	Off-site in watershed	9/16/2012
Balboa Terrace Trunk Sewer Replacement	Wetland Enhancement	SCLORF	0.006	Off-site in watershed	9/16/2012
Balboa Terrace Trunk Sewer Replacement	Wetland Enhancement	FM	0.04	Off-site in watershed	9/16/2012
Balboa Terrace Trunk Sewer Replacement	Wetland Enhancement	DWET	0.107	Off-site in watershed	9/16/2012
Balboa Terrace Trunk Sewer Replacement	Wetland Enhancement	NVC	0.014	Off-site in watershed	9/16/2012
Black Mountain Road Finger Canyon	Wetland Enhancement	FM	0.006	In-canyon	4/4/2003
Carmel Valley Rd Emergency Water Break	Wetland Enhancement	RS	0.052	Off-site in watershed	10/22/2010
Carmel Valley Rd Emergency Water Break	Wetland Enhancement	SWS	0.016	Off-site in watershed	10/22/2010

El Rancho (Penasquitos Enhancement)

Impact Project	Mitigation Type	Habitat Type	Acreage	Location	Impact Date
Carroll and Mesa Rim	Wetland Enhancement	SCLORF	0.2	Off-site in watershed	6/2/2003
Carroll and Mesa Rim	Wetland Enhancement	SWS	0.15	Off-site in watershed	6/2/2003
Carroll Canyon Emergency Sewer Repair	Wetland Enhancement	SAWRF	0.06	Off-site in watershed	2/26/2010
Carroll Canyon Emergency Sewer Repair	Wetland Enhancement	NVC	0.04	Off-site in watershed	2/26/2010
Gesner/Huron	Wetland Enhancement	RW	0.11	Off-site in watershed	8/1/1998
I-5/SR-52 Maintenance Project	Wetland Enhancement	SWS	0.03	Off-site in watershed	
Lopez Canyon LT	Wetland Enhancement	RW	0.01	In-canyon	
Lopez Canyon LT	Wetland Enhancement	SWS	0.03	In-canyon	
Lopez Canyon LT	Wetland Enhancement	NVC	0.01	In-canyon	
Lopez Canyon LT MH 13 Access	Wetland Enhancement	AM	0.3	In-canyon	9/26/2013
Lopez Emergency Cleaning	Wetland Enhancement	MFS	0.04	In-canyon	2/13/2005
Lopez Emergency Cleaning	Wetland Enhancement	SWS	0.08	In-canyon	2/13/2005
Lopez Emergency Cleaning	Wetland Enhancement	RF	0.008	In-canyon	2/13/2005
Lopez Emergency Cleaning	Wetland Enhancement	EW	0.001	In-canyon	2/13/2005
Lower Rose Canyon Emergency Repairs (MH 15)	Wetland Enhancement	SWS	0.32	Off-site in watershed	2/8/2005
Middle Rose Cyn MH 160 Emergency	Wetland Enhancement	SWS	0.02	Off-site in watershed	11/17/2011
Monte Verde Sewer Improvements	Wetland Enhancement	SRF	0.08	Off-site in watershed	1/1/2010
Old Rose Canyon Sewer Relocation Project	Wetland Enhancement	SWS	0.04	Off-site in watershed	2/8/2011
Old Rose Canyon Sewer Relocation Project	Wetland Enhancement	MFS	0.007	Off-site in watershed	2/8/2011
Old Rose Canyon Sewer Relocation Project	Wetland Enhancement	FM	0.002	Off-site in watershed	2/8/2011
Park Mesa LT	Wetland Enhancement	SWS	0.035	Off-site in watershed	1/11/2011
Penasquitos Bluffs LT	Wetland Enhancement	FM	0.014	Off-site in watershed	
Penasquitos Bluffs LT	Wetland Enhancement	AM	0.014	Off-site in watershed	
Penasquitos Bluffs LT	Wetland Enhancement	SWS	0.01	Off-site in watershed	

El Rancho (Penasquitos Enhancement)

Impact Project	Mitigation Type	Habitat Type	Acreage	Location	Impact Date
Penasquitos Preserve (East of Black Mountain Road)	Wetland Enhancement	SCWRF	0.18	In-canyon	10/16/2003
Penasquitos Preserve LT	Wetland Enhancement	RW	0.012	In-canyon	
Penasquitos Preserve LT	Wetland Enhancement	SCLORF	0.106	In-canyon	
Penasquitos Preserve LT	Wetland Enhancement	SCWRF	0.24	In-canyon	
Penasquitos Preserve LT	Wetland Enhancement	MFS	0.032	In-canyon	
Penasquitos Preserve LT	Wetland Enhancement	FM	0.045	In-canyon	
Penasquitos Preserve LT	Wetland Enhancement	NVC	0.005	In-canyon	
Penasquitos View Emergency	Wetland Enhancement	CAM	0.002	In-canyon	8/18/2004
Rose Canyon ER Repairs between 9/01 and 5/03	Wetland Enhancement	SWS	0.03	Off-site in watershed	9/1/2001
Rose Canyon ER Repairs between 9/01 and 5/03	Wetland Enhancement	RW	0.04	Off-site in watershed	9/1/2001
Rose Canyon ER Repairs between 9/01 and 5/03	Wetland Enhancement	NVC	0.0018	Off-site in watershed	9/1/2001
Rose Canyon ER Repairs between 9/01 and 5/03	Wetland Enhancement	MFS	0.03	Off-site in watershed	9/1/2001
San Clemente Emergency Sewer Encasement Repair	Wetland Enhancement	SCLORF	0.04	Off-site in watershed	12/13/2010
Stevenson Long Term Access Project	Wetland Enhancement	MFS	0.085	Off-site in watershed	
Stevenson Long Term Access Project	Wetland Enhancement	SWS	0.028	Off-site in watershed	
Stevenson Long Term Access Project	Wetland Enhancement	NVC	0.028	Off-site in watershed	
Van Nuys Canyon Emergency Sewer Repair Project	Wetland Enhancement	NVC	0.02	Off-site in watershed	12/31/2004
Van Nuys Canyon MH # 91 Sewer Blockage	Wetland Enhancement	MFS	0.29	Off-site in watershed	12/4/1996
Van Nuys Canyon MH # 91 Sewer Blockage	Wetland Enhancement	NVC	0.13	Off-site in watershed	12/4/1996
Van Nuys Canyon MHs 113, 114 and 93	Wetland Enhancement	NVC	0.003	Off-site in watershed	12/15/2003
Van Nuys Installation of 2 36-inch Pipe Culverts	Wetland Enhancement	SWS	0.03	Off-site in watershed	2/7/2001
Van Nuys MH #114 Sewage Leak Investigation	Wetland Enhancement	NVC	0.003	Off-site in watershed	4/4/2002
Van Nuys MH #124 Sewer Leak	Wetland Enhancement	NVC	0.03	Off-site in watershed	2/10/1998
Van Nuys MH #92-76 Four Sewer Breaks (Upper Canyon	Wetland Enhancement	MFS	0.146	Off-site in watershed	8/4/2000

El Rancho (Penasquitos Enhancement)

Impact Project	Mitigation Type	Habitat Type	Acreage	Location	Impact Date
Van Nuys MH #92-76 Four Sewer Breaks (Upper Canyon	Wetland Enhancement	DWET	0.25	Off-site in watershed	8/4/2000
Total Mitigation Acres:		3.7548 acres			

Lake Murray

Impact Project	Mitigation Type	Habitat Type	Acreage	Location	Impact Date
upland					
32nd Street - Huckleberry LT	Upland Restoration	NNG	0.009	Off-site out of watershed	1/1/2010
Alvarado Court Emergency Sewer Repair	Upland Restoration	DCSS	0.29	Off-site in watershed	10/5/1998
Alvarado TS MH 459 and 458 Maintenance	Upland Restoration	DCSS	0.005	Off-site in watershed	5/1/2013
Buchanan Sewer Blockage Emergency	Upland Restoration	SMC	0.023	Off-site in watershed	12/2/2013
Buchanan Sewer Blockage Emergency	Upland Restoration	DCSS	0.032	Off-site in watershed	12/2/2013
Cardinal Drive Sewer Emergency	Upland Restoration	DCSS	0.0016	Off-site in watershed	12/14/2012
Chocolate Access MH 273 to 267	Upland Restoration	CC	0.002	Off-site out of watershed	
Florida Canyon	Upland Restoration	DCSS	0.01	Off-site out of watershed	2/28/2004
Huckleberry (32nd & Beech)	Upland Restoration	DCSS	0.009	Off-site out of watershed	7/17/2001
Huckleberry (32nd & Beech)	Upland Restoration	NNG	0.023	Off-site out of watershed	7/17/2001
Huckleberry (32nd St Canyon Emergency Maintenance)	Upland Restoration	NNG	0.03	Combination	7/21/2003
Hwy 163 (7th and Brookes 2004 Emergency Maint)	Upland Restoration	NNG	0.035	Off-site in watershed	5/28/2004
Hwy 163 Corridor (7th & Brookes 2002 Emergency Repa	Upland Restoration	NNG	0.015	Off-site in watershed	11/30/2002
Junipero Serra (Jackson/Mission Gorge Emergency)	Upland Restoration	DCSS	0.06	Off-site in watershed	11/13/2002
Lake Murray Emergency Cleaning	Upland Restoration	DCSS	0.64	In-canyon	12/1/2002
Lake Murray Emergency Cleaning	Upland Restoration	NNG	0.1	In-canyon	12/1/2002
Lake Murray Trunk Sewer and Permanent Access Path	Upland Restoration	NNG	0.05	In-canyon	
Lake Murray Trunk Sewer and Permanent Access Path	Upland Restoration	DCSS	3.32	In-canyon	
Lake Murray Trunk Sewer and Permanent Access Path	Upland Restoration	BBS	0.33	In-canyon	

Lake Murray

Impact Project	Mitigation Type	Habitat Type	Acreage	Location	Impact Date
Switzer MH 152 Access	Upland Restoration	DCSS	0.009	Off-site out of watershed	1/27/2014
Total Mitigation Acres:		4.9936 acres			
wetland					
32nd Street - Huckleberry LT	Wetland Enhancement	DWET	0.04	Off-site in watershed	1/1/2010
54th & Maisel	Wetland Enhancement	FM	0.008	Off-site in watershed	7/2/2001
60th Street Pipe Relocation/Permanent Access	Wetland Enhancement	DWET	0.005	Off-site in watershed	
Alvarado Court Emergency Sewer Repair	Wetland Enhancement	SWS	0.016	Off-site in watershed	10/5/1998
Alvarado Court Emergency Sewer Repair	Wetland Enhancement	FM	0.08	Off-site in watershed	10/5/1998
Alvarado Court Emergency Sewer Repair	Wetland Enhancement	NVC	0.03	Off-site in watershed	10/5/1998
Chocolate Access MH 273 to 267	Wetland Enhancement	EW	0.0064	Off-site out of watershed	
Chocolate Combined	Wetland Enhancement	NVC	0.008	Off-site out of watershed	8/1/2000
Huckleberry (32nd & Beech)	Wetland Enhancement	DWET	0.007	Off-site out of watershed	7/17/2001
Huckleberry (32nd & Beech)	Wetland Enhancement	NVC	0.005	Off-site out of watershed	7/17/2001
Hwy 163 Corridor (7th & Brookes 2002Emergency Repa	Wetland Enhancement	NVC	0.02	Off-site in watershed	11/30/2002
Junipero Serra (Jackson/Mission Gorge Emergency)	Wetland Enhancement	SWS	0.01	Off-site in watershed	11/13/2002
Junipero Serra (Mission Gorge Emergency Repair)	Wetland Enhancement	SWS	0.03	Off-site in watershed	12/11/2001
Junipero Serra (Superior Ready Mix Emergency Repai	Wetland Enhancement	SWS	0.6	Off-site in watershed	1/26/2002
Junipero Serra (Superior Ready Mix Emergency Repai	Wetland Enhancement	NVC	0.04	Off-site in watershed	1/26/2002
Junipero Serra (Superior Ready Mix Emergency Repai	Wetland Enhancement	SCWRF	0.18	Off-site in watershed	1/26/2002
Lake Murray Emergency Cleaning	Wetland Enhancement	NVC	0.01	In-canyon	12/1/2002
Lake Murray Emergency Cleaning	Wetland Enhancement	SWS	0.01	In-canyon	12/1/2002
Lake Murray Trunk Sewer and Permanent Access Path	Wetland Enhancement	SWS	0.32	In-canyon	
Lake Murray Trunk Sewer and Permanent Access Path	Wetland Enhancement	NVC	0.01	In-canyon	
Lake Murray Trunk Sewer and Permanent Access Path	Wetland Enhancement	FM	0.07	In-canyon	

Lake Murray

Impact Project	Mitigation Type	Habitat Type	Acreage	Location	Impact Date
Mission Center Rd. (Kearny Mesa)	Wetland Enhancement	SWS	0.007	Off-site in watershed	1/13/2002
Switzer Canyon Emergency Sewer Repair Project	Wetland Enhancement	NVC	0.05	Off-site out of watershed	2/27/2002
Total Mitigation Acres:			1.5624 acres		

Los Penasquitos North

Impact Project	Mitigation Type	Habitat Type	Acreage	Location	Impact Date
upland					
Los Penasquitos North Wetland Creation Project	Upland Restoration	DCSS	0.82	On-impact	
Torreyana Sewer Repair	Upland Restoration	DCSS	0.21	Off-site in watershed	10/1/2001
Total Mitigation Acres:			1.03 acres		

wetland

Acuna LT	Wetland Creation	DWET	0.01	Off-site in watershed	2/1/2005
Black Mountain Road Finger Canyon	Wetland Creation	FM	0.006	In-canyon	4/4/2003
Carmel Valley Rd Emergency Water Break	Wetland Creation	RS	0.026	Off-site in watershed	10/22/2010
Carmel Valley Rd Emergency Water Break	Wetland Creation	SWS	0.008	Off-site in watershed	10/22/2010
Carroll and Mesa Rim	Wetland Creation	RW	0.72	Off-site in watershed	6/2/2003
Carroll and Mesa Rim	Wetland Creation	SWS	0.15	Off-site in watershed	6/2/2003
Carroll and Mesa Rim	Wetland Creation	MFS	0.44	Off-site in watershed	6/2/2003
Carroll and Mesa Rim	Wetland Creation	SCLORF	0.1	Off-site in watershed	6/2/2003
Lopez Canyon LT	Wetland Creation	SWS	0.03	In-canyon	
Lopez Canyon LT	Wetland Creation	NVC	0.01	In-canyon	
Lopez Canyon LT	Wetland Creation	RW	0.005	In-canyon	
Lopez Canyon LT MH 13 Access	Wetland Creation	AM	0.1	In-canyon	9/26/2013
Lopez Canyon Manhole 102 Maintenance	Wetland Creation	NVC	0.001	In-canyon	8/18/2005
Lopez Canyon MH 45 Protection	Wetland Creation	NVC	0.0004	In-canyon	

Los Penasquitos North

Impact Project	Mitigation Type	Habitat Type	Acreage	Location	Impact Date
Lopez Emergency Cleaning	Wetland Creation	EW	0.001	In-canyon	2/13/2005
Lopez Emergency Cleaning	Wetland Creation	SWS	0.08	In-canyon	2/13/2005
Lopez Emergency Cleaning	Wetland Creation	RF	0.004	In-canyon	2/13/2005
Lopez Emergency Cleaning	Wetland Creation	MFS	0.04	In-canyon	2/13/2005
Lopez MH 102 Emergency	Wetland Creation	NVC	0.003	In-canyon	12/18/2009
Lower Rose Creek Emergency Maintenance	Wetland Creation	FM	0.03	Off-site in watershed	2/20/2004
Lower Rose Creek Emergency Maintenance	Wetland Creation	MFS	0.05	Off-site in watershed	2/20/2004
Lower Rose Creek Emergency Maintenance	Wetland Creation	SWS	0.21	Off-site in watershed	2/20/2004
Lower Rose Creek Emergency Maintenance	Wetland Creation	RW	0.52	Off-site in watershed	2/20/2004
Park Mesa LT	Wetland Creation	NVC	0.006	Off-site in watershed	1/11/2011
Park Mesa LT	Wetland Creation	SWS	0.035	Off-site in watershed	1/11/2011
Penasquitos Preserve (East of Black Mountain Road)	Wetland Creation	SCWRF	0.09	In-canyon	10/16/2003
Penasquitos Preserve LT	Wetland Creation	SCWRF	0.12	In-canyon	
Penasquitos Preserve LT	Wetland Creation	SCLORF	0.053	In-canyon	
Penasquitos Preserve LT	Wetland Creation	RW	0.006	In-canyon	
Penasquitos Preserve LT	Wetland Creation	MFS	0.008	In-canyon	
Penasquitos Preserve LT	Wetland Creation	FM	0.045	In-canyon	
Penasquitos View Emergency	Wetland Creation	CAM	0.002	In-canyon	8/18/2004
Penasquitos Views Trunk Sewer	Wetland Creation	SWS	0.192	In-canyon	
Van Nuys Canyon MH # 91 Sewer Blockage	Wetland Creation	MFS	0.07	Off-site in watershed	12/4/1996
Van Nuys Installation of 2 36-inch Pipe Culverts	Wetland Creation	SWS	0.03	Off-site in watershed	2/7/2001
Van Nuys MH #92-76 Four Sewer Breaks (Upper Canyon	Wetland Creation	MFS	0.146	Off-site in watershed	8/4/2000
Van Nuys MH #92-76 Four Sewer Breaks (Upper Canyon	Wetland Creation	DWET	0.25	Off-site in watershed	8/4/2000

Total Mitigation Acres: 3.5974 acres

Marron Valley Cornerstone Lands Conservation Bank

Impact Project	Mitigation Type	Habitat Type	Acreage	Location	Impact Date
upland					
45th & Boston	Upland Bank	NNG	0.07	Off-site out of watershed	12/13/2002
54th & Maisel	Upland Bank	DCSS	0.04	Off-site out of watershed	7/2/2001
60th Street Pipe Relocation/Permanent Access	Upland Bank	NNG	0.024	Off-site out of watershed	
60th Street Pipe Relocation/Permanent Access	Upland Bank	DCSS	0.095	Off-site out of watershed	
Alvarado LT	Upland Bank	DCSS	0.07	Off-site out of watershed	
Alvarado LT	Upland Bank	CC	0.04	Off-site out of watershed	
Alvarado LT	Upland Bank	SMC	0.01	Off-site out of watershed	
Balboa Terrace Trunk Sewer Replacement	Upland Bank	DCSS	0.354	Off-site out of watershed	9/16/2012
Buchanan	Upland Bank	DCSS	0.04	Off-site out of watershed	3/11/2002
Buchanan	Upland Bank	SMC	0.12	Off-site out of watershed	3/11/2002
Buchanan	Upland Bank	POS	0.13	Off-site out of watershed	3/11/2002
Buchanan (10th & Johnson Ave. Emergency Repair)	Upland Bank	DCSS	0.13	Off-site out of watershed	9/6/2002
Buchanan (Highway 163 & Lincoln Street Emergency)	Upland Bank	DCSS	0.018	Off-site out of watershed	4/11/2003
Buchanan (Highway 163 & Lincoln Street Emergency)	Upland Bank	SMC	0.054	Off-site out of watershed	4/11/2003
Buchanan LT	Upland Bank	SMC	0.043	Off-site out of watershed	1/1/2004
Buchanan LT	Upland Bank	POS	0.026	Off-site out of watershed	1/1/2004
Buchanan/Caminito Fuente	Upland Bank	DCSS	0.02	Off-site out of watershed	9/15/2004
Dakota Canyon Replacement/Relocation/Access	Upland Bank	DCSS	0.57	Off-site out of watershed	1/22/2008
Euclid & Menlo (47th & Thorn Sewer Maint & Emerg)	Upland Bank	NNG	0.05	Off-site out of watershed	2/1/2004
Euclid & Menlo (47th & Thorn Sewer Maint & Emerg)	Upland Bank	DCSS	0.01	Off-site out of watershed	2/1/2004
Hwy 163 North LT	Upland Bank	NNG	0.19	Off-site out of watershed	
I-805 & 94 Canyon (40th & C Emergency Repair)	Upland Bank	NNG	0.011	Off-site out of watershed	2/6/2003
I-805 & 94 Canyon (40th & C Emergency Repair)	Upland Bank	SMC	0.016	Off-site out of watershed	2/6/2003

Marron Valley Cornerstone Lands Conservation Bank

Impact Project	Mitigation Type	Habitat Type	Acreage	Location	Impact Date
Lexington (Central & Redwood Emergency)	Upland Bank	NNG	0.14	Off-site out of watershed	1/1/1999
Lexington (Central & Redwood Emergency)	Upland Bank	SMC	0.002	Off-site out of watershed	1/1/1999
Lexington/Manzanita Pipe and MH Replacement Emer	Upland Bank	SMC	0.059	Off-site out of watershed	11/4/2008
Mission Center LT	Upland Bank	DCSS	0.14	Off-site out of watershed	7/1/2004
Mission Center LT	Upland Bank	SMC	0.04	Off-site in watershed	7/1/2004
Norfolk (Fairmont & Montezuma)	Upland Bank	SMC	0.106	Off-site out of watershed	4/22/2002
Norfolk (Fairmont & Montezuma)	Upland Bank	BBS	0.06	Off-site out of watershed	4/22/2002
Norfolk (Fairmont & Montezuma)	Upland Bank	DCSS	0.398	Off-site out of watershed	4/22/2002
Norfolk (Fairmont & Montezuma)	Upland Bank	POS	0.151	Off-site out of watershed	4/22/2002
Norfolk Canyon Maintenance Project	Upland Bank	SMC	0.002	Off-site out of watershed	6/10/2004
Norfolk Canyon Maintenance Project	Upland Bank	DCSS	0.302	Off-site out of watershed	6/10/2004
Norfolk LT	Upland Bank	SMC	0.02	Off-site out of watershed	7/1/2004
Otay Valley TS Pipe Protection	Upland Bank	NNG	0.02	Off-site out of watershed	9/16/2013
Pump Station 77 Inspections	Upland Bank	NNG	0.02	Off-site out of watershed	
Pump Station 77 Inspections	Upland Bank	DCSS	0.348	Off-site out of watershed	
Rancho Bernardo 15 East	Upland Bank	DCSS	0.31	Off-site out of watershed	3/17/2004
Rancho Bernardo 15 East (Escala Emergency)	Upland Bank	DCSS	0.1	Off-site out of watershed	8/24/2007
Rancho Mission LT	Upland Bank	DCSS	0.006	Off-site out of watershed	11/12/2013
Shepherd	Upland Bank	DCSS	0.01	Off-site out of watershed	2/1/2003
Shepherd LT	Upland Bank	NNG	0.09	Off-site in watershed	
South Chollas LTA	Upland Bank	DCSS	0.508	Off-site out of watershed	
Stevenson	Upland Bank	DCSS	0.14	Off-site out of watershed	8/8/2001
Stevenson	Upland Bank	POS	0.04	Off-site out of watershed	8/8/2001
Stevenson Canyon Manhole 138 Emergency	Upland Bank	NNG	0.18	Off-site out of watershed	3/23/2006

Marron Valley Cornerstone Lands Conservation Bank

Impact Project	Mitigation Type	Habitat Type	Acreage	Location	Impact Date
Stevenson Long Term Access Project	Upland Bank	NNG	0.28	Off-site out of watershed	
Trinidad & Euclid	Upland Bank	SMC	0.13	Off-site out of watershed	5/9/2001
USIU	Upland Bank	SMC	0.2	Off-site out of watershed	
USIU	Upland Bank	DCSS	0.2	Off-site out of watershed	
USIU	Upland Bank	NNG	0.75	Off-site out of watershed	
Total Mitigation Acres:			6.883 acres		

Otay Mesa Mitigation Bank

Impact Project	Mitigation Type	Habitat Type	Acreage	Location	Impact Date
upland					
15 West and Elanus	Upland Bank	DCSS	0.2	Off-site out of watershed	12/19/2003
Acuna	Upland Bank	DCSS	0.01	Off-site out of watershed	3/11/2002
Acuna	Upland Bank	SMC	0.07	Off-site out of watershed	3/11/2002
Auburn & Belle Island (Isla Vista/Auburn Dr. Emerg	Upland Bank	DCSS	0.06	Off-site out of watershed	10/21/2002
Bounty & Waring (Bounty & Spear Emergency Repair)	Upland Bank	DCSS	0.2	Off-site out of watershed	4/29/2003
Elanus & Murray Canyons (I-15 & Clairemont Mesa Bl	Upland Bank	DCSS	0.122	Off-site out of watershed	12/11/2002
Euclid & Menlo (47th & Thorn Sewer Maint & Emerg)	Upland Bank	SMRC	0.05	Off-site out of watershed	2/1/2004
Euclid & Menlo Canyon (47th & Thorn Emergency Repa	Upland Bank	SMRC	0.02	Off-site out of watershed	4/29/2002
Fairmont & Home	Upland Bank	SMRC	0.11	Off-site out of watershed	4/9/2004
Fairmont & Home	Upland Bank	NNG	0.25	Off-site out of watershed	4/9/2004
Hopkins	Upland Bank	NNG	0.14	Off-site out of watershed	3/17/2004
Hopkins (Calle Abajo Emergency)	Upland Bank	NNG	0.09	Off-site out of watershed	4/3/2002
Hwy 163 North LT	Upland Bank	CLOW	0.04	Off-site out of watershed	
Norfolk (Fairmont & Montezuma)	Upland Bank	SOC	0.046	Off-site out of watershed	4/22/2002
Rancho Bernardo 15 East	Upland Bank	DCSS	0.31	Off-site out of watershed	3/17/2004

Otay Mesa Mitigation Bank

Impact Project	Mitigation Type	Habitat Type	Acreage	Location	Impact Date
Rancho Mission LT	Upland Bank	DCSS	0.026	Off-site out of watershed	11/12/2013
South Juniper Emergency Project	Upland Bank	DCSS	0.001	Off-site out of watershed	5/14/2006
Switzer MH 152 Access	Upland Bank	SOC	0.009	Off-site out of watershed	1/27/2014
Total Mitigation Acres:		1.754 acres			

Penasquitos Eucalyptus Removal

Impact Project	Mitigation Type	Habitat Type	Acreage	Location	Impact Date
wetland					
Carroll and Mesa Rim	Wetland Enhancement	RW	0.31	Off-site in watershed	6/2/2003
Total Mitigation Acres:		0.31 acres			

Rancho Mission Enhancement

Impact Project	Mitigation Type	Habitat Type	Acreage	Location	Impact Date
wetland					
15 West and Elanus	Wetland Enhancement	SWS	0.05	Off-site in watershed	12/19/2003
Alvarado Court Sewer Crossing	Wetland Enhancement	SWS	0.005	Off-site in watershed	
Alvarado LT	Wetland Enhancement	MFS	0.01	Off-site in watershed	
Alvarado LT	Wetland Enhancement	NVC	0.01	Off-site in watershed	
Alvarado LT	Wetland Enhancement	DWET	0.01	Off-site in watershed	
Alvarado Trunk Sewer	Wetland Enhancement	DWET	0.022	Off-site in watershed	
Barr Avenue (Hotel Circle) part of Dove Canyon	Wetland Enhancement	NVC	0.01	Off-site in watershed	8/16/2003
Bay View Emergency Response Project	Wetland Enhancement	NVC	0.013	Off-site out of watershed	8/20/2004
Buchanan	Wetland Enhancement	DWET	0.322	Off-site in watershed	3/11/2002
Buchanan	Wetland Enhancement	SWS	0.0108	Off-site in watershed	3/11/2002
Buchanan B	Wetland Enhancement	NVC	0.02	Off-site in watershed	
Buchanan LT	Wetland Enhancement	DWET	0.06	Off-site in watershed	1/1/2004

Rancho Mission Enhancement

Impact Project	Mitigation Type	Habitat Type	Acreage	Location	Impact Date
Buchanan LT	Wetland Enhancement	NVC	0.624	Off-site in watershed	1/1/2004
Buchanan Sewer Blockage Emergency	Wetland Enhancement	SWS	0.011	Off-site in watershed	12/2/2013
Chollas Dam Vegetation Removal	Wetland Enhancement	FM	0.022	Off-site in watershed	1/22/2013
Chollas Exposed Water Main Repair	Wetland Enhancement	RS	0.014	Off-site out of watershed	8/30/2011
Delevan & I-15 Emerg Repair (South Juniper Canyon)	Wetland Enhancement	NVC	0.03	Off-site out of watershed	7/27/2005
Elanus & Murray Canyons (I-15 & Clairemont Mesa Bl	Wetland Enhancement	SWS	0.007	Off-site in watershed	12/11/2002
Elanus (I-15 & Clairemont Mesa Blvd) LT	Wetland Enhancement	EW	0.005	Off-site in watershed	
Euclid & Menlo (47th & Thorn Sewer Maint & Emerg)	Wetland Enhancement	DWET	0.08	Off-site out of watershed	2/1/2004
Euclid & Menlo (47th & Thorn Sewer Maint & Emerg)	Wetland Enhancement	NVC	0.01	Off-site out of watershed	2/1/2004
Euclid & Menlo Canyon (47th & Thorn Emergency Repa	Wetland Enhancement	NVC	0.0011	Off-site out of watershed	4/29/2002
Euclid and Menlo Emerg Pipe Protection	Wetland Enhancement	NVC	0.005	Off-site out of watershed	5/26/2011
Federal & Chollas	Wetland Enhancement	DWET	0.0008	Off-site out of watershed	10/22/2002
Fox Canyon (University & 49th) Emergency Repair	Wetland Enhancement	NVC	0.002	Off-site out of watershed	10/29/2007
Hopkins	Wetland Enhancement	DWET	0.02	Off-site out of watershed	3/17/2004
Hopkins (Calle Abajo Emergency)	Wetland Enhancement	NVC	0.002	Off-site out of watershed	4/3/2002
Huckleberry (32nd St Canyon Emergency Maintenance)	Wetland Enhancement	DWET	0.04	Off-site out of watershed	7/21/2003
Hwy 163 Corridor (7th & Brookes 2002Emergency Repa	Wetland Enhancement	NVC	0.02	Off-site out of watershed	11/30/2002
Hwy 163 North LT	Wetland Enhancement	NVC	0.001	Off-site out of watershed	
I-15 & Adams	Wetland Enhancement	NVC	0.07	Off-site in watershed	5/6/2004
I-15 & Adams	Wetland Enhancement	EW	0.004	Off-site in watershed	5/6/2004
I-805 & 94 Canyon (40th & C Emergency Repair)	Wetland Enhancement	NVC	0.0013	Off-site out of watershed	2/6/2003
Isla Vista Emergency Response Project	Wetland Enhancement	NVC	0.003	Off-site out of watershed	5/17/2004
Lexington/Manzanita Pipe and MH Replacement Emer	Wetland Enhancement	NVC	0.016	Off-site out of watershed	11/4/2008
Lexington/Manzanita Pipe Encasement Emergency	Wetland Enhancement	NVC	0.005	Off-site out of watershed	6/4/2009

Rancho Mission Enhancement

Impact Project	Mitigation Type	Habitat Type	Acreage	Location	Impact Date
Market & Euclid (MH 88 Repair at Encanto Creek)	Wetland Enhancement	SWS	0.003	Off-site out of watershed	10/22/2009
Mission Center Canyon B	Wetland Enhancement	EW	0.02	Off-site in watershed	1/1/2011
Mission Center Canyon B	Wetland Enhancement	DWET	0.014	Off-site in watershed	1/1/2011
Mission Center Canyon B	Wetland Enhancement	RS	0.025	Off-site in watershed	1/1/2011
Mission Center Canyon Emergency Sewer Repair	Wetland Enhancement	SWS	0.004	Off-site in watershed	3/10/2010
Mission Center Canyon Emergency Sewer Repair	Wetland Enhancement	FM	0.023	Off-site in watershed	3/10/2010
Mission Center Canyon Emergency Sewer Repair	Wetland Enhancement	NVC	0.014	Off-site in watershed	3/10/2010
Mission Center Canyon Emergency Sewer Repair	Wetland Enhancement	DWET	0.006	Off-site in watershed	3/10/2010
Murphy Canyon TS Access and Repair	Wetland Enhancement	FM	0.051	Off-site out of watershed	
Norfolk (Fairmont & Montezuma)	Wetland Enhancement	SWS	0.003	Off-site in watershed	4/22/2002
Norfolk (Fairmont & Montezuma)	Wetland Enhancement	NVC	0.042	Off-site in watershed	4/22/2002
Norfolk Canyon Maintenance Project	Wetland Enhancement	NVC	0.002	Off-site in watershed	6/10/2004
Presidio (Palm Cyn) GJ665	Wetland Enhancement	RS	0.165	Off-site in watershed	
Presidio (Palm Cyn) GJ665	Wetland Enhancement	NVC	0.0137	Off-site in watershed	
Rancho Mission (Mission Gorge Canyon, Conestoga Co	Wetland Enhancement	NVC	0.008	In-canyon	2/7/2002
Rancho Mission (Mission Gorge Canyon, Conestoga Co	Wetland Enhancement	DWET	0.005	In-canyon	2/7/2002
Rancho Mission LT	Wetland Enhancement	SWS	0.007	Off-site in watershed	11/12/2013
San Diego Mission Rd Emergency	Wetland Enhancement	FM	0.01	Off-site in watershed	7/9/2011
San Diego Mission Rd Emergency	Wetland Enhancement	SWS	0.01	Off-site in watershed	7/9/2011
Shepherd	Wetland Enhancement	SWS	0.01	Off-site in watershed	2/1/2003
Shepherd LT	Wetland Enhancement	RW	0.06	Off-site in watershed	
Shepherd LT	Wetland Enhancement	RS	0.02	Off-site in watershed	
Shepherd LT	Wetland Enhancement	NVC	0.03	Off-site in watershed	
Shepherd LT	Wetland Enhancement	DWET	0.015	Off-site in watershed	

Rancho Mission Enhancement

Impact Project	Mitigation Type	Habitat Type	Acreage	Location	Impact Date
South Chollas LTA	Wetland Enhancement	MFS	0.0015	Off-site out of watershed	
South Juniper Emergency Project	Wetland Enhancement	NVC	0.02	Off-site out of watershed	5/14/2006
Valencia Canyon Emergency Repair & Maintenance	Wetland Enhancement	MFS	0.004	Off-site out of watershed	1/25/2003
Valencia Canyon Emergency Repair & Maintenance	Wetland Enhancement	NVC	0.0014	Off-site out of watershed	1/25/2003
Willow St. Canyon	Wetland Enhancement	NVC	0.004	Off-site out of watershed	5/2/2005
Woodman Canyon Emergency Sewer Access and Repair	Wetland Enhancement	NVC	0.004	Off-site out of watershed	1/6/2005
Total Mitigation Acres:			2.1326 acres		

Rose Canyon Wetland and Upland

Impact Project	Mitigation Type	Habitat Type	Acreage	Location	Impact Date
upland					
I-5/SR-52 Maintenance Project	Upland Restoration	NNG	0.01	In-canyon	
I-5/SR-52 Maintenance Project	Upland Restoration	DCSS	0.02	In-canyon	
Middle Rose Creek (ER Repair -Rose W of Genesee)	Upland Restoration	NNG	0.04	In-canyon	12/1/2002
Middle Rose Creek (ER Repair -Rose W of Genesee)	Upland Restoration	DCSS	0.06	In-canyon	12/1/2002
Miramar Trunk Sewer Replacement Project	Upland Restoration	POS	0.117	In-canyon	7/6/2007
Miramar Trunk Sewer Replacement Project	Upland Restoration	BBS	0.959	In-canyon	7/6/2007
Miramar Trunk Sewer Replacement Project	Upland Restoration	CLOW	0.154	In-canyon	7/6/2007
Miramar Trunk Sewer Replacement Project	Upland Restoration	NNG	0.181	In-canyon	7/6/2007
Miramar Trunk Sewer Replacement Project	Upland Restoration	DCSS	0.737	In-canyon	7/6/2007
Miramar Trunk Sewer Replacement Project	Upland Restoration	SOC	0.027	In-canyon	7/6/2007
Miramar Trunk Sewer Replacement Project	Upland Restoration	SMC	0.058	In-canyon	7/6/2007
Old Rose Canyon Sewer Relocation Project	Upland Restoration	NNG	0.045	In-canyon	2/8/2011
Penasquitos Bluffs (Finger Canyon Emergency)	Upland Restoration	SOC	0.3	Off-site in watershed	11/1/2000
Penasquitos Bluffs (Finger Canyon Emergency)	Upland Restoration	NG	0.02	Off-site in watershed	11/1/2000

Rose Canyon Wetland and Upland

Impact Project	Mitigation Type	Habitat Type	Acreage	Location	Impact Date
Penasquitos View Emergency	Upland Restoration	DCSS	0.01	Off-site in watershed	8/18/2004
Rose Canyon ER Repairs between 9/01 and 5/03	Upland Restoration	BBS	0.03	In-canyon	9/1/2001
Rose Canyon ER Repairs between 9/01 and 5/03	Upland Restoration	POS	0.05	In-canyon	9/1/2001
Rose Canyon ER Repairs between 9/01 and 5/03	Upland Restoration	DCSS	0.13	In-canyon	9/1/2001
Rose Canyon ER Repairs between 9/01 and 5/03	Upland Restoration	NNG	0.2	In-canyon	9/1/2001
Total Mitigation Acres:			3.148 acres		

Wetland

Black Mtn Access Rd Repair	Wetland Creation	Streambed	0.038	Off-site in watershed	
I-5/SR-52 Maintenance Project	Wetland Creation	SWS	0.03	In-canyon	
Lower Rose Canyon Emergency Repairs (MH 15)	Wetland Enhancement	EW	0.005	In-canyon	2/8/2005
Lower Rose Canyon Emergency Repairs (MH 15)	Wetland Enhancement	MFS	0.11	In-canyon	2/8/2005
Lower Rose Canyon Emergency Repairs (MH 15)	Wetland Creation	SWS	0.32	In-canyon	2/8/2005
Lower Rose Canyon Emergency Repairs (MH 15)	Wetland Enhancement	CVFM	0.21	In-canyon	2/8/2005
Lower Rose Canyon Emergency Repairs (MH 15)	Wetland Creation	CVFM	0.21	In-canyon	2/8/2005
Lower Rose Canyon Emergency Repairs (MH 15)	Wetland Creation	MFS	0.11	In-canyon	2/8/2005
Lower Rose Canyon Emergency Repairs (MH 15)	Wetland Creation	EW	0.005	In-canyon	2/8/2005
Middle Rose Cyn MH 160 Emergency	Wetland Enhancement	NVC	0.02	Off-site in watershed	11/17/2011
Middle Rose Cyn MH 160 Emergency	Wetland Creation	SWS	0.02	Off-site in watershed	11/17/2011
Miramar Trunk Sewer Replacement Project	Wetland Creation	RW	0.577	In-canyon	7/6/2007
Miramar Trunk Sewer Replacement Project	Wetland Creation	MFS	1.352	In-canyon	7/6/2007
Miramar Trunk Sewer Replacement Project	Wetland Creation	SCLORF	0.162	In-canyon	7/6/2007
Miramar Trunk Sewer Replacement Project	Wetland Creation	SWS	0.445	In-canyon	7/6/2007
Monte Verde Sewer Improvements	Wetland Creation	SRF	0.04	In-canyon	1/1/2010
Old Rose Canyon Sewer Relocation Project	Wetland Creation	MFS	0.007	In-canyon	2/8/2011

Rose Canyon Wetland and Upland

Impact Project	Mitigation Type	Habitat Type	Acreage	Location	Impact Date
Old Rose Canyon Sewer Relocation Project	Wetland Creation	SWS	0.04	In-canyon	2/8/2011
Old Rose Canyon Sewer Relocation Project	Wetland Creation	FM	0.002	In-canyon	2/8/2011
Rose Canyon ER Repairs between 9/01 and 5/03	Wetland Creation	MFS	0.03	In-canyon	9/1/2001
Rose Canyon ER Repairs between 9/01 and 5/03	Wetland Creation	RW	0.02	In-canyon	9/1/2001
Rose Canyon ER Repairs between 9/01 and 5/03	Wetland Creation	NVC	0.0018	In-canyon	9/1/2001
Rose Creek East of I-805 (Miramar Rd & Commerce Av	Wetland Creation	SWS	0.03	In-canyon	3/11/2002
Rose Creek Emergency Bypass Project	Wetland Enhancement	NVC	0.005	In-canyon	1/31/2005
Total Mitigation Acres:			3.7898 acres		

San Clemente Wetland and Upland

Impact Project	Mitigation Type	Habitat Type	Acreage	Location	Impact Date
upland					
Gesner LT	Upland Restoration	DCSS	0.1	Off-site in watershed	
Gesner/Huron	Upland Restoration	NNG	0.01	Off-site in watershed	8/1/1998
Penasquitos Bluffs (Finger Canyon Emergency)	Upland Restoration	DCSS	0.71	Off-site in watershed	11/1/2000
Penasquitos Bluffs (Finger Canyon Emergency)	Upland Restoration	CC	0.02	Off-site in watershed	11/1/2000
Penasquitos Bluffs (Finger Canyon Emergency)	Upland Restoration	NNG	0.03	Off-site in watershed	11/1/2000
San Clemente (Emergency Repairs Combined)	Upland Restoration	DCSS	0.051	In-canyon	9/1/2001
San Clemente (Emergency Repairs Combined)	Upland Restoration	NNG	0.005	In-canyon	9/1/2001
San Clemente Canyon Access Path LT Project	Upland Restoration	DCSS	0.035	In-canyon	
San Clemente Canyon Access Path LT Project	Upland Restoration	CLOW	0.54	In-canyon	
San Clemente Canyon Biltmore Pipe Protection Emerg	Upland Restoration	NNG	0.051	In-canyon	11/30/2006
San Clemente Canyon Biltmore Pipe Protection Emerg	Upland Restoration	DCSS	0.01	In-canyon	11/30/2006
San Clemente Canyon Biltmore Pipe Protection Emerg	Upland Restoration	SMC	0.01	In-canyon	11/30/2006
San Clemente LT MH #4	Upland Restoration	DCSS	0.076	In-canyon	9/20/2010

San Clemente Wetland and Upland

Impact Project	Mitigation Type	Habitat Type	Acreage	Location	Impact Date
Wet Weather Stream Discharge	Upland Restoration	SMC	0.06	In-canyon	
Wet Weather Stream Discharge	Upland Restoration	DCSS	0.38	In-canyon	
Total Mitigation Acres:			2.088 acres		
wetland					
Balboa Terrace Trunk Sewer Replacement	Wetland Creation	FM	0.04	Off-site in watershed	9/16/2012
Balboa Terrace Trunk Sewer Replacement	Wetland Creation	SWS	0.064	Off-site in watershed	9/16/2012
Balboa Terrace Trunk Sewer Replacement	Wetland Creation	SCLORF	0.003	Off-site in watershed	9/16/2012
Balboa Terrace Trunk Sewer Replacement	Wetland Creation	MFS	0.022	Off-site in watershed	9/16/2012
Balboa Terrace Trunk Sewer Replacement	Wetland Creation	DWET	0.107	Off-site in watershed	9/16/2012
Balboa Terrace Trunk Sewer Replacement	Wetland Creation	NVC	0.014	Off-site in watershed	9/16/2012
Carroll Canyon Emergency Sewer Repair	Wetland Creation	SAWRF	0.03	Off-site in watershed	2/26/2010
Carroll Canyon Emergency Sewer Repair	Wetland Creation	NVC	0.01	Off-site in watershed	2/26/2010
Dakota Canyon Replacement/Relocation/Access	Wetland Creation	NVC	0.03	Off-site in watershed	1/22/2008
East Tecolote Canyon Pipe Encasemt Protection Proj	Wetland Creation	SRF	0.04	Off-site in watershed	10/4/2010
East Tecolote Canyon Pipe Encasemt Protection Proj	Wetland Creation	SWS	0.036	Off-site in watershed	10/4/2010
East Tecolote Canyon Pipe Encasemt Protection Proj	Wetland Creation	OW	0.023	Off-site in watershed	10/4/2010
Penasquitos Bluffs LT	Wetland Creation	FM	0.014	Off-site in watershed	
Penasquitos Bluffs LT	Wetland Creation	SWS	0.01	Off-site in watershed	
Penasquitos Bluffs LT	Wetland Creation	AM	0.014	Off-site in watershed	
San Clemente Canyon Access Path LT Project	Wetland Creation	SCLORF	0.85	In-canyon	
San Clemente Canyon Access Path LT Project	Wetland Creation	SCWRF	0.27	In-canyon	
San Clemente Canyon Biltmore Pipe Protection Emerg	Wetland Creation	NVC	0.004	In-canyon	11/30/2006
San Clemente Canyon Biltmore Pipe Protection Emerg	Wetland Creation	SCLORF	0.117	In-canyon	11/30/2006
San Clemente Canyon Mitigation Project	Wetland Creation	SCLORF	0.003	In-canyon	9/15/2007

San Clemente Wetland and Upland

Impact Project	Mitigation Type	Habitat Type	Acreage	Location	Impact Date
San Clemente Emergency Sewer Encasement Repair	Wetland Creation	NVC	0.01	In-canyon	12/13/2010
San Clemente Emergency Sewer Encasement Repair	Wetland Creation	SCLORF	0.02	In-canyon	12/13/2010
Soledad Valley Water Line Break	Wetland Creation	AM	0.2	Off-site in watershed	3/23/2009
Stevenson Long Term Access Project	Wetland Creation	SWS	0.028	Off-site in watershed	
Stevenson Long Term Access Project	Wetland Creation	MFS	0.085	Off-site in watershed	
Tecolote Mt. Ashmun Pipe Protection Emergency	Wetland Creation	RF	0.01	Off-site in watershed	1/17/2008
Wet Weather Stream Discharge	Wetland Creation	NVC	0.01	In-canyon	
Total Mitigation Acres:			2.064 acres		

Tecolote - Tree of Heaven removal

Impact Project	Mitigation Type	Habitat Type	Acreage	Location	Impact Date
wetland					
Tecolote	Wetland Enhancement	SCLORF	0.25	In-canyon	2/28/2001
Total Mitigation Acres:			0.25 acres		

Tecolote Canyon Wetland and Upland

Impact Project	Mitigation Type	Habitat Type	Acreage	Location	Impact Date
upland					
East Tecolote (East Clairemont)	Upland Restoration	DCSS	0.012	In-canyon	1/8/2002
East Tecolote (East Clairemont) LT	Upland Restoration	DCSS	0.286	In-canyon	
East Tecolote (East Clairemont) LT	Upland Restoration	POS	0.015	In-canyon	
East Tecolote (East Clairemont) LT	Upland Restoration	SOC	0.126	In-canyon	
East Tecolote Emergency MH 218	Upland Restoration	DCSS	0.027	In-canyon	2/8/2010
East Tecolote Manholes 223 and 224 Emergency	Upland Restoration	DCSS	0.009	In-canyon	12/16/2009
East Tecolote Manholes 223 and 224 Emergency	Upland Restoration	CLOW	0.018	In-canyon	12/16/2009
Manning Canyon Sewer Repair	Upland Restoration	DCSS	0.002	In-canyon	12/11/2013

Tecolote Canyon Wetland and Upland

Impact Project	Mitigation Type	Habitat Type	Acreage	Location	Impact Date
Manning Street Sewer Repair	Upland Restoration	DCSS	1	In-canyon	7/6/2001
Manning Street Sewer Repair	Upland Restoration	NNG	0.1	In-canyon	7/6/2001
Park Mesa LT	Upland Restoration	NNG	0.009	Off-site in watershed	1/11/2011
Park Mesa LT	Upland Restoration	DCSS	0.108	Off-site in watershed	1/11/2011
Park Mesa LT	Upland Restoration	SMC	0.015	Off-site in watershed	1/11/2011
Park Mesa Way	Upland Restoration	BBS	0.04	In-canyon	1/13/2000
Stevenson Canyon MH 257 Emergency	Upland Restoration	DCSS	0.0048	Off-site in watershed	10/30/2012
Tecolote	Upland Restoration	DCSS	0.07	In-canyon	2/28/2001
Tecolote	Upland Restoration	POS	0.03	In-canyon	2/28/2001
Tecolote (including Mt. Elbrus)	Upland Restoration	NNG	0.05	In-canyon	11/18/2002
Tecolote (including Mt. Elbrus)	Upland Restoration	DCSS	0.245	In-canyon	11/18/2002
Tecolote Canyon Mitigation Project	Upland Restoration	POS	0.65	In-canyon	
Tecolote Emergency Pipe Repair (Crossing)	Upland Restoration	DCSS	0.004	In-canyon	12/13/2004
Tecolote LT	Upland Restoration	DCSS	0.4	In-canyon	
Tecolote Pipe Repair Near Manhole 346	Upland Restoration	DCSS	0.024	In-canyon	8/17/2009
Tecolote Pipe Repair Near Manhole 346	Upland Restoration	NNG	0.11	In-canyon	8/17/2009
Total Mitigation Acres:			3.3548 acres		
wetland					
East Tecolote (East Clairemont)	Wetland Creation	SWS	0.0001	In-canyon	1/8/2002
East Tecolote (East Clairemont)	Wetland Creation	SRF	0.004	In-canyon	1/8/2002
East Tecolote (East Clairemont) LT	Wetland Creation	SWS	0.039	In-canyon	
East Tecolote (East Clairemont) LT	Wetland Creation	SRF	0.229	In-canyon	
East Tecolote (East Clairemont) LT	Wetland Creation	NVC	0.008	In-canyon	
East Tecolote (East Clairemont) LT	Wetland Creation	FM	0.014	In-canyon	

Tecolote Canyon Wetland and Upland

Impact Project	Mitigation Type	Habitat Type	Acreage	Location	Impact Date
East Tecolote Emergency MH 218	Wetland Creation	NVC	0.007	In-canyon	2/8/2010
East Tecolote Emergency MH 218	Wetland Creation	SRF	0.048	In-canyon	2/8/2010
East Tecolote Manholes 223 and 224 Emergency	Wetland Creation	FM	0.039	In-canyon	12/16/2009
East Tecolote Manholes 223 and 224 Emergency	Wetland Creation	SWS	0.033	In-canyon	12/16/2009
East Tecolote Manholes 223 and 224 Emergency	Wetland Creation	SRF	0.034	In-canyon	12/16/2009
East Tecolote Manholes 223 and 224 Emergency	Wetland Creation	OW	0.015	In-canyon	12/16/2009
Park Mesa Way	Wetland Creation	SWS	0.15	In-canyon	1/13/2000
Tecolote (including Mt. Elbrus)	Wetland Creation	SCLORF	0.2	In-canyon	11/18/2002
Tecolote (including Mt. Elbrus)	Wetland Creation	SWS	0.13	In-canyon	11/18/2002
Tecolote Emergency Pipe Repair (Crossing)	Wetland Creation	EW	0.002	In-canyon	12/13/2004
Tecolote Emergency Pipe Repair (Crossing)	Wetland Creation	SWS	0.008	In-canyon	12/13/2004
Tecolote Emergency Pipe Repair (Crossing)	Wetland Creation	SCLORF	0.002	In-canyon	12/13/2004
Tecolote LT	Wetland Creation	MFS	0.01	In-canyon	
Tecolote LT	Wetland Creation	SWS	0.03	In-canyon	
Tecolote LT	Wetland Creation	SRF	0.341	In-canyon	
Tecolote MH 101 Emergency	Wetland Creation	NVC	0.0034	In-canyon	4/5/2010
Tecolote MH 101 Emergency	Wetland Creation	MFS	0.0005	In-canyon	4/5/2010
Tecolote Mt. Ashmun Pipe Protection Emergency	Wetland Creation	RF	0.01	In-canyon	1/17/2008
Tecolote Mt. Ashmun Pipe Protection Erosion Contro	Wetland Creation	RF	0.002	In-canyon	9/9/2009
Tecolote Mt. Ashmun Pipe Protection Erosion Contro	Wetland Creation	SWS	0.001	In-canyon	9/9/2009
Tecolote North Exposed TS Emergency	Wetland Creation	NVC	0.001	In-canyon	10/31/2013
Tecolote Pipe Repair Near Manhole 346	Wetland Creation	SRF	0.035	In-canyon	8/17/2009
Total Mitigation Acres:			1.396 acres		

From: Alexis Wallick <awallick@palatribe.com>
Sent: Wednesday, January 06, 2016 11:55 AM
To: PLN_PlanningCEQA
Subject: University Community Plan Amendment; Midway-Pacific Highway and Old Town San Diego Community Plan Update; San Ysidro Community Plan Update and El Pueblito Viejo Village Specific Plan; Sewer & Water Group Job No. 827
Attachments: City of San Diego- University Community Plan Amendment.pdf; City of San Diego- Midway-Pacific Highway and Old Town San Diego Community Plan Update.pdf; City of San Diego- San Ysidro Community Plan Update and El Pueblito Viejo Village Specific Plan- 310690.pdf; City of San Diego- Sewer and Water Group Job No. 827.pdf

Attached is the response to the request for comment on this project, sent on behalf of Shasta Gaughen.

Alexis Wallick

[Pala Band of Mission Indians](#)

[Assistant Tribal Historic Preservation Officer](#)

[Pala Environmental Department, THPO](#)

[35008 Pala Temecula Road, Pmb 50; Pala, CA 92059](#)

[\(760\)891-3537](#)

awallick@palatribe.com

ped.palatribe.com

**PALA TRIBAL HISTORIC
PRESERVATION OFFICE**

PMB 50, 35008 Pala Temecula Road
Pala, CA 92059
760-891-3510 Office | 760-742-3189 Fax



January 6, 2016

Susan Morrison
City of San Diego, Planning Dept.
1222 First Ave, MS 413
San Diego, CA 92101

Re: University Community Plan Amendment

Dear Mrs. Morrison:

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

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

We appreciate involvement with your initiative and look forward to working with you on future efforts. If you have questions or need additional information, please do not hesitate to contact me by telephone at 760-891-3515 or by e-mail at sgaughen@palatribe.com.

Sincerely,

A handwritten signature in black ink, appearing to read "Shasta C. Gaughen". The signature is written in a cursive style with a long horizontal stroke at the end.

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

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

**PALA TRIBAL HISTORIC
PRESERVATION OFFICE**

PMB 50, 35008 Pala Temecula Road
Pala, CA 92059
760-891-3510 Office | 760-742-3189 Fax



January 6, 2016

Rebecca Malone
City of San Diego, Planning Dept.
1222 First Ave, MS 413
San Diego, CA 92101

Re: San Ysidro Community Plan Update and El Pueblito Viejo Village Specific Plan/
310690

Dear Mrs. Malone:

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

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

We appreciate involvement with your initiative and look forward to working with you on future efforts. If you have questions or need additional information, please do not hesitate to contact me by telephone at 760-891-3515 or by e-mail at sgaughen@palatribe.com.

Sincerely,

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

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

**PALA TRIBAL HISTORIC
PRESERVATION OFFICE**

PMB 50, 35008 Pala Temecula Road
Pala, CA 92059
760-891-3510 Office | 760-742-3189 Fax



January 6, 2016

Susan Morrison
City of San Diego, Planning Dept.
1222 First Ave, MS 413
San Diego, CA 92101

Re: Midway-Pacific Highway and Old Town San Diego Community Plan Updates

Dear Mrs. Morrison:

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

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

We appreciate involvement with your initiative and look forward to working with you on future efforts. If you have questions or need additional information, please do not hesitate to contact me by telephone at 760-891-3515 or by e-mail at sgaughen@palatribe.com.

Sincerely,

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

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

**PALA TRIBAL HISTORIC
PRESERVATION OFFICE**

PMB 50, 35008 Pala Temecula Road
Pala, CA 92059
760-891-3510 Office | 760-742-3189 Fax



January 6, 2016

Myra Herrmann
City of San Diego, Planning Dept.
1222 First Ave, MS 413
San Diego, CA 92101

Re: Sewer & Water Group Job No. 827

Dear Mrs. Herrmann:

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

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

We appreciate involvement with your initiative and look forward to working with you on future efforts. If you have questions or need additional information, please do not hesitate to contact me by telephone at 760-891-3515 or by e-mail at sgaughen@palatribe.com.

Sincerely,

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

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

From: [Alison Barton](#)
To: [PLN_PlanningCEQA](#)
Subject: University City Community Plan Amendment
Date: Sunday, January 03, 2016 5:12:34 PM

Hello,

I'm writing to show my support for removing the Regents Road Bridge and widening of Genesee from the University City Plan. We live on the North side of Rose Canyon. As a mother of two children who attend Doyle elementary, I find the canyon a great place to take my kids to experience a little nature while still being close to home. I walk my children to Doyle each morning (along with most of the rest of the school), and we enjoy the walkability of UTC as it stands now. My kids and I enjoy watching the college kids dash across the road to catch the UCSD shuttles. North UTC is a great neighborhood and much more dense than the south side of Rose Canyon. I feel it would be detrimental to our community if more cars were put on Regents Road. Public transit and walking is the way to get around North UTC.

I'd also like to suggest a pocket park at the end of Regents Road Bridge. The UTC Farmer's Market already happens there once a week and a little park there would be great. I believe this would greatly enhance the community and be in line with the city's plan to make neighborhoods more walkable. There are A LOT of children that live in the apartments and condos in North UTC and a small park in the canyon would really be a fabulous upgrade.

Please let me know if there is any additional information I can provide.

Sincerely,
Alison Barton
cell (858) 775-0747

From: [Angela Nesta](#)
To: [PLN_PlanningCEQA](#)
Subject: Schedule No.: Pending (Internal Order 12002051/11003327)
Date: Wednesday, December 30, 2015 4:43:36 PM

To: Susan Morrison, Environmental Planner, City of San Diego Planning Department, 1010 Second Ave., MS 614C, San Diego, CA 92101

Dear Ms. Morrison,

I am writing you with an urgent plea that the Regents Road Bridge be built in the University City (UC) community. There are many reasons why the bridge needs to be built. But the most compelling and over-riding need is simple, yet paramount--people's lives.

Yes the Regents Road Bridge would relief traffic on Genesee Avenue, but the above all else, the bridge will save people lives.

Yes the Regents Road Bridge would aid in the emergency response all the community residents in UC, but the above all else, the bridge will save people lives.

Yes the Regents Road Bridge would enhance multi-modal transpiration (i.e. bike, pedestrian, wheelchair, etc.) but the above all else, the bridge will save people lives.

The need for evacuation is very real. A county wide fire came within a few miles of the UC community in 2003. The state of California tells its residents that a major earthquake *will* occur, which can easily trigger fires. A bridge that connects Regent Road that gives residents an avenue of escape *will* save lives.

I can't stress this enough. There isn't any property value, any City Council member election, any environmental concerns (if true), any wasted cost (if true) that can dismissed and minimize saving people's lives.

Therefore, I beg and plea to any and all who have it in their power to do so, to please--*please*, allow the Regents Road Bridge to be built. I can't say it enough--people's live depend on it.

Angela Nesta
7097 Teasdale Avenue
San Diego, CA 92122

Austin Speed
7110 Cather Ct.
San Diego, CA 92122
December 13, 2015

To: Susan Morrison, Environmental Planner
City of San Diego Planning Department
1010 Second Avenue, MS 614C
San Diego, CA 92101
Via: Planningceqa@sandiego.gov

Subject: Comment Schedule for University City EIR Scoping Document; Internal Order No. 12002051/11003327

Dear Ms. Morrison:

My wife, Diane, and I have been residents of the University City neighborhood in San Diego since 1982. We recently became aware of the NOP for the above-referenced project, which was dated December 2, 2015. This document calls for a comment period of 30 days which ends on Friday, January 1, 2016. January 1st is, of course, a legal holiday. There is also an EIR Scoping meeting in University City scheduled for December 16, 2015.

I am asking that this comment period be extended for at least 30 days. I also recommend that the EIR Scoping meeting be rescheduled for some time in the second week of January, 2016.

I believe that this schedule, as it currently stands, is extremely poor timing for this important step in the process. The subject of this EIR is incredibly important to a great many people in Clairemont, University City, Mira Mesa, and other areas of San Diego. For many people, at least half of this 30 day period constitutes the end of year holiday period when they are taking time off to go on vacations, and are otherwise occupied with family and holiday activities. For most of us the holiday season is incredibly busy and even stressful. The schedule for submission of these comments, as it now stands, just piles more stress into an otherwise challenging calendar period. I believe that this will significantly reduce the level of public participation and very likely result in poor input to help with the process.

I have just begun to study the document and already have noted some apparent deficiencies:

- The document does not overtly require an evaluation of intermodal transportation requirements for University City. The words “intermodal” or “disabled” do not appear in the document.
- The document does not include previous EIR efforts by reference, and therefore does not seem to bind any EIR study contractor to review or be aware of previous EIR studies. One of the premises of the City Council’s proposed amendment to the City Plan is that

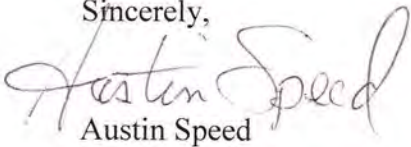
significant factors have changed since the subject was last studied. These assertions, as enumerated in the subject City Council amendment, should be included in the Scope of Work, and should be evaluated by the EIR contractor.

- The document refers to “the project” consistently throughout. The antecedent to this phrase is confusing because “the project”, apparently, is to eliminate two potential projects - the Regents Road Bridge and the widening of Genesee Avenue. As a result, each study element is a study of what happens if these things aren’t done. Status quo seems to be the subject of the study, in other words. This could be logically confusing to any EIR contractor that typically sees a Statement of Work to study the impact of an actual planned project. I recommend that the Scope of Work be clarified in an effort to eliminate this potential confusion.
- More emphasis should be placed in this document on projecting the environmental impacts of not building the Regents Road Bridge and not widening Genesee Avenue. These impacts are significant because stalled cars on Genesee Avenue during peak times sit and wait for multiple light changes on a routine basis. This can be seen on Genesee Avenue almost every working day of the year – especially between 3:00 and 6:00 pm. This has to have an impact on the area’s air quality, but the air quality section of the NOP Scope of Work appears to be a requirement to review existing data. I would like to see an explicit requirement to measure the air quality on Genesee Avenue during peak traffic periods and some evaluation of the projected the improvement of air quality if the congested traffic is relieved through the use of an additional 4 lane north-south roadway (Regents Road).

These are just a few of the issues I was able to note in a cursory examination of the document. We need much more time to study the NOP document, particularly the Scope of Work section, and recommend changes that will lead to a more complete scope for the EIR contractor.

Once again, I am recommending that you extend the comment period schedule for this NOP document to the end of January 2016, and that the Scoping Meeting be rescheduled in January after the holiday season. Thank you for your consideration in this matter. Please let me know what you decide.

Sincerely,


Austin Speed

Comment from Austin Speed, 7110 Cather Ct., San Diego, CA 92122, (619) 665-6865

Page 2 of the NOP's Scope of Work document says: "This EIR analyzes the impacts related to removing the Genesee Avenue widening and Regents Road Bridge projects from the University Community Plan (UCP) Transportation Element...". It goes on to define five additional alternatives.

The document continues to describe elements of the scope of the EIR as being focused on "the project." This is confusing because a project, as described in current CEQA Guidelines – Key Definitions Section 15378, is an activity that is planned that would involve potential environmental impact. Key terms associated with this definition of the word "Project" include government public works, contractors developing public projects, or projects that require permits, licenses, certificates, or other entitlements from the government to property developers.

Asking for an EIR contractor to assess the environmental impact of the removal of a project or multiple projects from an existing plan does not comply with the definition of a project in CEQA guidelines. There is no basis to measure the impact of the removal of a planned project other than to report on current conditions.

The primary "project" as it is referred to in the NOP's Scope of Work document (which is described as the removal of the Regents Road Bridge and Genesee Avenue widening projects) is not a project. In addition, the first alternative described in the Scope document (which is to indefinitely postpone these two projects -- referred to as the "No Project" alternative) is not a project.

To clarify the objectives of the EIR effort, the projects that should be described are:

- PRIMARY: Reporting on the environmental impact of completing both the 4 lane Regents Road Bridge and the Genesee Avenue widening projects (the current UCP Transportation Element)

- ALTERNATIVES:
 1. Completing the 4 lane Regents Road Bridge project only
 2. Completing the Genesee Avenue widening project only
 3. Constructing an emergency access, transit, pedestrian, and bicycle use only bridge project (it is not clear where this "half bridge" concept originated. It does not appear to be in the UCP).
 4. Constructing an emergency access, transit, pedestrian, and bicycle use only bridge project added to the Genesee Avenue widening project

I recommend eliminating the language describing the removal of the Regents Road Bridge project and the Genesee Avenue widening project as the removal of any project is not a project in the sense that an environmental impact will result. The environmental impact will occur only if the projects are done. The NOP should be rewritten to reflect the CEQA definition of a project in order to clarify this Scope of Work for the EIR contractor.

Austin H. Speed, III 12/18/15
auspeed@gmail.com

Comment from Austin Speed, 7110 Cather Ct., San Diego, CA 92122, (619) 665-6865

The document does not include previous EIR efforts by reference, and therefor does not seem to bind any EIR study contractor to review or be aware of previous EIR or traffic studies.

One of the premises of the City Council's proposed amendment to the City Plan is that significant factors have changed since the subject was last studied. San Diego City Council Resolution 309247, dated October 14, 2014 says "the transportation thresholds were last updated based on a focused transportation study dated October 9, 1997 that does not reflect the most recent development patterns and traffic impacts."

The assertion that traffic patterns have changed significantly, as stated in the subject City Council resolution, should be included in the Scope of Work, and should be evaluated by the EIR contractor. The EIR contractor should have the benefit of availability of all previous EIRs and traffic studies.

Austin H. Speed III 12/18/15
auspeed@gmail.com

Comment from Austin Speed, 7110 Cather Ct., San Diego, CA 92122, (619) 665-6865

The NOP's Scope of Work document does not overtly require the contractor to evaluate projects from the standpoint of potential improvements to multimodal transportation in the University City area. The terms "multimodal" or "disabled" or "complete streets" do not appear in the document.

The document does say "the EIR should also address consistency with planned alternative transportation systems and related policies, as well as potential hazards to motor vehicles, pedestrians, and bicycles."

More than assessing potential hazards, the document should address the potential for the projects under study actually improving on the existing deficiencies in multimodal transportation accommodations for pedestrians, bicyclists, and the disabled.

Austin H. Speed, III 12/18/15
auspeed@gmail.com

Comment from Austin Speed, 7110 Cather Ct., San Diego, CA 92122 (619) 665-6865

The air quality section of the EIR Scope of Work should require the contractor to address the air quality issues that specifically result from the current congested traffic conditions.

It is not obvious whether the Scope of Work document actually requires the EIR contractor to run any specific air quality tests or simply review available air quality data. Slow moving traffic during peak times of the day have a measurable impact on air quality. I recommend that the Scope of Work explicitly require tests of the air quality during peak traffic periods accompanied with a projection of the impact on air quality if the Regents Road Bridge and/or Genesee Avenue widening is implemented. I personally recommend that air quality measurements be focused on the school areas in University City including U.C. High School, Standley Middle School, Curie Elementary School, Spreckels Elementary School, Doyle Elementary School, and the UCSD campus.

Austin H. Speed, III 12/18/15
auspeed@gmail.com

From: [auspeed.](#)
To: [Morrison, Susan](#)
Cc: [Schoenfisch, Brian](#); [Monroe, Daniel](#); [Murphy, Jeff](#); [Blake, Martha](#); [Herrmann, Myra](#); [Garcia, Melissa](#)
Subject: Comments on the NOP for the University City EIR
Date: Friday, January 01, 2016 8:56:56 PM
Attachments: [UCP NOP Comments - CFRRB 1 Jan 2016.pdf](#)

Dear Ms. Morrison,

I have attached a letter with our comments in response to the the Notice of Preparation for the EIR being undertaken to consider changes to the University Community Plan.

We have strong feelings regarding the need for this EIR to be structured and executed correctly and with sufficient time for a complete analysis. Currently planned roadway improvements in the University Community Plan must be properly evaluated to understand their long term value.

Please feel free to contact me if you have any questions regarding this letter.

Respectfully,

Austin Speed
President, Citizens for the Regents Road Bridge
[619-665-6865](tel:619-665-6865)

Austin Speed
President, Citizens for the Regents Road Bridge
4079 Governor Dr. #165
San Diego CA 92122
auspeed@gmail.com

January 1, 2016

Susan I. Morrison, AICP
Associate Planner
City of San Diego, Planning Department - Environmental
1010 2nd Avenue, MS 614C
San Diego, CA 92101
[\(619\) 533-6492](tel:6195336492)
SIMorrison@sandiego.gov

Via Email (6 pages)

Dear Ms. Morrison,

This letter contains comments from multiple members of our organization, Citizens for the Regents Road Bridge. It was compiled somewhat hastily due to a lack of cooperation from the city in spite of numerous requests to extend the comment period for the “PUBLIC NOTICE OF THE PREPARATION OF AN ENVIRONMENTAL IMPACT REPORT AND A SCOPING MEETING INTERNAL ORDER No. 12002051/11003327” which technically ends tomorrow on January 1, 2016, a legal holiday.

For the record, we object to the rushed nature of this comment process which is scheduled through the holiday period to end on New Year’s Day. We also object to what appears to be a questionable public notification process via the use of the *San Diego Daily Transcript* for publication of the notice. Although we have seen evidence that the notice went out, the *SDDT* ceased active publication in San Diego at one point last year. The organization that purchased the paper’s identity does not seem to have significant circulation of any kind in San Diego and it is truly questionable as to whether the use of this publication is a viable public notification venue. This is an issue we are continuing to review.

Here are the specific comments we have on the NOP document and the Scope of Work document included within it. We are honestly trying to provide constructive comments that will assist the city in preparing a credible EIR as part of this process. We hope you find these comments helpful.

COMMENT 1. PROJECT DEFINITION: Page 2 of the NOP’s Scope of Work document says: “This EIR analyzes the impacts related to removing the Genesee Avenue widening and Regents Road Bridge projects from the University Community Plan (UCP) Transportation Element...”. It goes on to define five additional alternatives.

The document continues to describe elements of the scope of the EIR as being focused on “the project.” This is confusing because a project, as described in current CEQA Guidelines (Key Definitions Section 15378) is an activity that is planned that would involve potential environmental impact. Key terms associated with this definition of the word “project” include government public works, contractors developing public projects, or projects that require permits, licenses, certificates, or other entitlements from the government to property developers.

Asking for an EIR contractor to assess the environmental impact of the removal of a project or multiple projects from an existing plan does not comply with the definition of a project in CEQA guidelines. There is no basis to measure the impact of the removal of a planned project other than to report on current conditions.

The primary “project” as it is referred to in the NOP’s Scope of Work document (which is described as the removal of the Regents Road Bridge and Genesee Avenue widening projects) is not a project. In addition, the first alternative described in the Scope document (which is to indefinitely postpone these two projects -- referred to as the “No Project” alternative) is not a project.

To clarify the objectives of the EIR effort, we recommend that the project alternatives to be studied be listed as the following:

- **PRIMARY:** Reporting on the environmental impact of completing both the 4 lane Regents Road Bridge and the Genesee Avenue widening projects (the current UCP Transportation Element)
- **ALTERNATIVES:** Reporting on the environmental impact of:
 1. Completing the 4 lane Regents Road Bridge project only
 2. Completing the Genesee Avenue widening project only
 3. Constructing an emergency access, transit, pedestrian, and bicycle use only bridge project (it is not clear where this “half bridge” concept originated. It does not appear to be in the UCP).
 4. Constructing an emergency access, transit, pedestrian, and bicycle use only bridge project added to the Genesee Avenue widening project

We recommend eliminating the language describing the removal of the Regents Road Bridge project and the Genesee Avenue widening project. Rationale: the removal of any project from the city plan is not a project in the sense that an environmental impact will result. The environmental impact will occur only if the projects are done. The NOP should be rewritten to reflect the CEQA definition of a project in order to clarify this Scope of Work.

Section K of the Scope of Work says: “This alternative (referring to the No Project Alternative) should compare the environmental effects of buildout under the adopted plan with those alternatives associated with the removal of the Genesee Avenue widening and Regents Road Bridge projects.” Once again, the removal of Genesee Avenue widening and the subject bridge project represent existing conditions. It is difficult to read most of this document without seeing the bias toward removing these projects from the City Plan. However, the removal of these

projects from the city's project roster should be a political decision and should not be the result of asking an EIR evaluation team to rationalize the impact of doing nothing as a having some kind of overwhelmingly positive environmental impact.

COMMENT 2. REVIEW OF PREVIOUS RELEVANT EIR STUDIES: The document does not include previous EIR reports by reference, and does not seem to bind any EIR study contractor with the responsibility or obligation to review previous EIRs or traffic studies.

One of the premises of the City Council's proposed amendment to the City Plan is that significant factors have changed since the subject was last studied. San Diego City Council Resolution 309247, dated October 14, 2014 says "the transportation thresholds were last updated based on a focused transportation study dated October 9, 1997 that does not reflect the most recent development patterns and traffic impacts."

The assertion that traffic patterns have changed significantly, as stated in the subject City Council resolution, should be included in the Scope of Work, and should be evaluated by the EIR contractor. The EIR contractor should have the benefit of availability of all previous EIRs and traffic studies.

COMMENT 3. MULTIMODAL TRANSPORTATION ASSESSMENT: The NOP's Scope of Work document does not overtly require the contractor to evaluate projects from the standpoint of potential improvements to multimodal transportation in the University City area. The terms "multimodal" or "disabled" or "complete streets" do not appear in the document.

The document does say "the EIR should also address consistency with planned alternative transportation systems and related policies, as well as potential hazards to motor vehicles, pedestrians, and bicycles." The extension of Regents Road via completion of the Regents Road Bridge and widening of north Regents Road would provide an important pedestrian and bicycle route. Its deletion would cause pedestrian and bicycle trips to be rerouted for several miles. The impacts of the current traffic conditions on pedestrian and bicycle travel should be documented and mitigation measures should be evaluated and recommended for any significant impacts.

More than assessing potential hazards, the document should address the potential for the projects under study actually improving the current deficiencies in multimodal transportation accommodations for pedestrians, bicyclists, and the disabled – specifically between North UC and South UC (south of Rose Canyon). Specific tests involving people with a range of physical capabilities should be conducted with requirements to attempt to traverse from south to north UC (and vice versa) as pedestrians, bicyclists, and people with representative disabilities.

COMMENT 4. SPECIFIC AIR QUALITY ASSESSMENTS AND TESTS: The air quality section of the EIR Scope of Work should require the contractor to address the air quality issues that specifically result from the current congested traffic conditions.

It is not obvious whether the Scope of Work document actually requires the EIR contractor to run any specific air quality tests or simply review available air quality data. Slow moving traffic during peak times of the day have a measurable impact on air quality. I recommend that the Scope of

Work explicitly require tests of the air quality during peak traffic periods accompanied with a projection of the impact on air quality if the Regents Road Bridge and/or Genesee Avenue widening is implemented. We recommend that air quality measurements be focused on the school areas in University City – U.C. High School, Standley Middle School, Curie Elementary School, Spreckels Elementary School, Doyle Elementary School, and the UCSD campus.

The deletion of the Regents Road Bridge project will cause increases in the lengths of vehicle trips due to the re-routing of trips that would otherwise occur along Regents Road. The increase in vehicle miles travelled (VMT) caused by the deletion of Regents Road should be documented, including the increase in greenhouse gases that would occur.

COMMENT 5: REGENTS ROAD BRIDGE DESIGN ASSUMPTIONS: The Regents Road Bridge is described in the NOP as being implemented with two separate one-way spans. This appears to be an undocumented assumption on somebody's part that would probably increase the footprint on the canyon floor and increase the overall visual impact of the bridge. We are unaware of any design or planning studies that resulted in any decision to build two separate one-way spans for this bridge. Cost and environmental tradeoff analysis between this concept and a single span concept would be required. We are unaware of any published rationale for the selection of this bridge design concept.

COMMENT 6: OVERALL EIR SCOPE: The Scope of the required analysis to support this EIR effort appears to be constrained within the boundaries of the UCP, but the Regents Road Bridge is not an internal University City project. The Bridge is a gateway project inimical to the flow of commerce in and out of the boundaries such that the impact of the elimination of the bridge project or the No Project alternative must take into account how it affects traffic flows in Clairemont, Kearny Mesa, Tierrasanta, Mira Mesa and La Jolla at the very least. This must also relate the consequences of diversion of traffic out of way in terms of additional Vehicle Miles Travelled (VMT) and pollution. The traffic study part of the EIR should represent significant effort toward identifying the number of vehicles that must take indirect routes to travel between key locations in north and south UC (from north UC to Standley Middle School, for example).

The EIR analysis should take into account that Regents Road is an extension of Clairemont Mesa Boulevard, a major four lane collector extending across four freeways from the eastern boundary of Tierra Santa. Its link with the Golden Triangle is a significant component in the City's off-freeway traffic grid. This is essential to maintaining viability of the freeways by keeping them as free as possible from relatively short-haul traffic, and offers a choice for mobility if a freeway is blocked.

COMMENT 7. TRAFFIC EVALUATION PARAMETERS: In evaluating the impacts of traffic on the canyon, the mitigating effects on noise should be considered including the banning of large commercial trucks, the use of sound dampening surface technology such as rubberized asphalt paving, and the design features of the bridge itself. Note should be taken of the use of bridges to provide safe nesting boxes for birds.

COMMENT 8. HEALTH AND SAFETY: Credit should be given for safety benefits including the safe crossing of the rail corridor, the in line benefits for active transportation, the facilitation

of access for emergency vehicles, the availability for more convenient public transportation, and the addition of a vital new evacuation route in the event of a natural disaster.

The impacts of the deletion of the completion of Regents Road on police and fire response times should be documented and any significant safety impacts should be documented and mitigated.

COMMENT 9. ACKNOWLEDGING AND ASSESSING REGENTS ROAD’S “PASS-THROUGH” IMPLEMENTATION: The EIR project analysis should also acknowledge and credit the design of Regents Road through University City, which emphasizes safe pass-through characterized by the absence of any residential curb cuts. Traffic impacts on adjacent streets will be due to the normal ingress and egress by existing residents. The same is true in the Golden Triangle where curb access is limited to occasional common entryways for multifamily complexes, none close to the bridge approach.

COMMENT 10. COMPREHENSIVE ANALYSIS OF GENESEE AVENUE WIDENING: Efforts to analyze the widening of Genesee, either alone or with the bridge project, should consider the cost effectiveness of this project relative to the bridge, and the impacts to the existing Rose Canyon crossing, the three adjacent schools, the Governor Drive intersection, the eminent domain issues with neighboring residential properties, the disruption to existing traffic demands during construction on Genesee, and identify benefits which are superior to those provided by the new capacity of the bridge, and the ability to build it without said disruptions to existing infrastructure.

COMMENT 11. TRANSPORTATION/CIRCULATION ISSUES: This EIR will attempt to characterize current conditions in the region as a result of existing roadway infrastructure and the planned construction projects in University City and in surrounding areas. At issue is a proposed city amendment to delete proposed roadway improvements from the current approved UCP. Projects such as the expansion of UCSD’s east campus, the planned expansions to the Costa Verde shopping center area for retail and hotel spaces, and the Scripps Hospital expansion must be appropriately evaluated

It can reasonably be expected that the removal of planned roadway improvements will result in worsening traffic conditions on nearby roadways and intersections, some of which are experiencing unacceptable levels of traffic congestion during peak periods. The direct traffic impacts as a result of this amendment to the UCP will be significant.

Due to a high level of concentration of schools that are located near Genesee Avenue and Regents Road between Governor Drive and Nobel Drive, the EIR analysis should specifically consider the effects of traffic congestion in the mid-afternoon hours when the school day ends. While typical afternoon peak traffic periods may be expected to occur between 4:00 PM and 6:00 PM, the traffic analysis conducted in this area should investigate mid-afternoon traffic conditions and the potential for traffic impacts to occur during this period. It came to our attention during some community planning group meetings that traffic counts done in support of this study may not have included the crucial time periods representing the end of the school day.

The traffic increases that are expected by planned projects in the area are likely to cause cumulative traffic impacts on nearby roadways. We note that the NOP itself did not list references that the EIR contractor would be required to be aware of and/or comply with. They may be listed in other documentation supplied to the selected EIR contractor, however, we expect that the analysis of traffic increases caused by the removal of planned roadway

improvements and any significant traffic impacts will be analyzed, at a minimum, using the City of San Diego's Traffic Impact Study Manual (July 1998 or current version) and the City's CEQA significance thresholds.

For any significant direct and cumulative increased traffic impacts as a result of the removal of planned roadway improvements, it is recommended that mitigation measures be developed, evaluated, and described in detail in the resultant EIR to include cost estimates. It is important to understand the costs that would be associated with the construction of the roadway improvements currently planned in the UCP as compared to the costs of the proposed amendment that would be associated with mitigating the traffic impacts as a result of any decision to remove currently planned roadway improvements.

Some of the alternatives listed in the NOP represent proposals to abandon plans to complete the construction of Regents Road across Rose Canyon. Regents Road is one only three existing or planned crossings of Rose Canyon in the area between I-5 and I-15 (the others being Genesee Avenue and I-805). It will be important to document the potential for significant traffic impacts on I-5, Genesee Avenue, I-805, and I-15 that would be caused by the deletion of the Regents Road Bridge from the UCP. The City of San Diego's Traffic Impact Study Manual (July 1998 or current version) and the City's CEQA significance thresholds should be used in determining the extent of the significant traffic impacts caused by the removal of the Regents Road completion project from the University Community Plan.

We sincerely hope that our comments will assist the city in completing a meaningful and useful study of the emerging environmental and traffic conditions in the UC area along with a complete evaluation of the projects that would serve to mitigate those conditions. We feel as though this issue has been studied extensively and that this effort should appropriately address the planning efforts that have been undertaken to support appropriate and constructive decisions with regard to University City's future.

Please feel free to call me if you have any questions.

Sincerely,

A handwritten signature in black ink that reads "Austin Speed". The signature is written in a cursive, flowing style.

Austin Speed
619-665-6865
President, Citizens for the Regents Road Bridge

From: [auspeed_](#)
To: [PLN_PlanningCEQA](#)
Subject: Recommending Change to Comment Period for University City EIR Scoping Document
Date: Sunday, December 13, 2015 6:39:03 PM
Attachments: [Letter RE NOP Comment Schedule - Austin Speed 12-13-15.pdf](#)

Austin Speed
7110 Cather Ct.
San Diego, CA 92122
December 13, 2015

To: Susan Morrison, Environmental Planner
City of San Diego Planning Department
1010 Second Avenue, MS 614C
San Diego, CA 92101
Via: Planningceqa@sandiego.gov

Subject: Comment Schedule for University City EIR Scoping Document; Internal Order No. 12002051/11003327

Dear Ms. Morrison:

My wife, Diane, and I have been residents of the University City neighborhood in San Diego since 1982. We recently became aware of the NOP for the above-referenced project, which was dated December 2, 2015. This document calls for a comment period of 30 days which ends on Friday, January 1, 2016. January 1st is, of course, a legal holiday. There is also an EIR Scoping meeting in University City scheduled for December 16, 2015.

I am asking that this comment period be extended for at least 30 days. I also recommend that the EIR Scoping meeting be rescheduled for some time in the second week of January, 2016.

I believe that this schedule, as it currently stands, is extremely poor timing for this important step in the process. The subject of this EIR is incredibly important to a great many people in Clairemont, University City, Mira Mesa, and other areas of San Diego. For many people, at least half of this 30 day period constitutes the end of year holiday period when they are taking time off to go on vacations, and are otherwise occupied with family and holiday activities. For most of us the holiday season is incredibly busy and even stressful. The schedule for submission of these comments, as it now stands, just piles more stress into an otherwise challenging calendar period. I believe that this will significantly reduce the level of public participation and very likely result in poor input to help with the process.

I have just begun to study the document and already have noted some apparent deficiencies:

- The document does not overtly require an evaluation of intermodal transportation requirements for University City. The words “intermodal” or “disabled” do not appear in the document.
- The document does not include previous EIR efforts by reference, and therefore does not seem to bind any EIR study contractor to review or be aware of previous EIR studies. One of the premises of the City Council’s proposed amendment to the City Plan is that significant factors have changed since the subject was last studied. These assertions, as enumerated in the subject City Council amendment, should be included in the Scope of

Work, and should be evaluated by the EIR contractor.

- The document refers to “the project” consistently throughout. The antecedent to this phrase is confusing because “the project”, apparently, is to eliminate two potential projects - the Regents Road Bridge and the widening of Genesee Avenue. As a result, each study element is a study of what happens if these things aren’t done. Status quo seems to be the subject of the study, in other words. This could be logically confusing to any EIR contractor that typically sees a Statement of Work to study the impact of an actual planned project. I recommend that the Scope of Work be clarified in an effort to eliminate this potential confusion.
- More emphasis should be placed in this document on projecting the environmental impacts of not building the Regents Road Bridge and not widening Genesee Avenue. These impacts are significant because stalled cars on Genesee Avenue during peak times sit and wait for multiple light changes on a routine basis. This can be seen on Genesee Avenue almost every working day of the year – especially between 3:00 and 6:00 pm. This has to have an impact on the area’s air quality, but the air quality section of the NOP Scope of Work appears to be a requirement to review existing data. I would like to see an explicit requirement to measure the air quality on Genesee Avenue during peak traffic periods and some evaluation of the projected the improvement of air quality if the congested traffic is relieved through the use of an additional 4 lane north-south roadway (Regents Road).

These are just a few of the issues I was able to note in a cursory examination of the document. We need much more time to study the NOP document, particularly the Scope of Work section, and recommend changes that will lead to a more complete scope for the EIR contractor.

Once again, I am recommending that you extend the comment period schedule for this NOP document to the end of January 2016, and that the Scoping Meeting be rescheduled in January after the holiday season. Thank you for your consideration in this matter. Please let me know what you decide.

Sincerely,

Austin Speed

(A signed copy of this letter is attached.)

Austin Speed
7110 Cather Ct.
San Diego, CA 92122
December 13, 2015

To: Susan Morrison, Environmental Planner
City of San Diego Planning Department
1010 Second Avenue, MS 614C
San Diego, CA 92101
Via: Planningceqa@sandiego.gov

Subject: Comment Schedule for University City EIR Scoping Document; Internal Order No. 12002051/11003327

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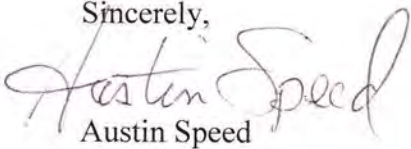
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- The document refers to “the project” consistently throughout. The antecedent to this phrase is confusing because “the project”, apparently, is to eliminate two potential projects - the Regents Road Bridge and the widening of Genesee Avenue. As a result, each study element is a study of what happens if these things aren’t done. Status quo seems to be the subject of the study, in other words. This could be logically confusing to any EIR contractor that typically sees a Statement of Work to study the impact of an actual planned project. I recommend that the Scope of Work be clarified in an effort to eliminate this potential confusion.
- More emphasis should be placed in this document on projecting the environmental impacts of not building the Regents Road Bridge and not widening Genesee Avenue. These impacts are significant because stalled cars on Genesee Avenue during peak times sit and wait for multiple light changes on a routine basis. This can be seen on Genesee Avenue almost every working day of the year – especially between 3:00 and 6:00 pm. This has to have an impact on the area’s air quality, but the air quality section of the NOP Scope of Work appears to be a requirement to review existing data. I would like to see an explicit requirement to measure the air quality on Genesee Avenue during peak traffic periods and some evaluation of the projected the improvement of air quality if the congested traffic is relieved through the use of an additional 4 lane north-south roadway (Regents Road).

These are just a few of the issues I was able to note in a cursory examination of the document. We need much more time to study the NOP document, particularly the Scope of Work section, and recommend changes that will lead to a more complete scope for the EIR contractor.

Once again, I am recommending that you extend the comment period schedule for this NOP document to the end of January 2016, and that the Scoping Meeting be rescheduled in January after the holiday season. Thank you for your consideration in this matter. Please let me know what you decide.

Sincerely,


Austin Speed

From: [auspeed.](#)
To: [Morrison, Susan](#)
Cc: [Schoenfisch, Brian](#); [Murphy, Jeff](#); [Blake, Martha](#); [Bragado, Nancy](#); [Herrmann, Myra](#); [Garcia, Melissa](#); [Monroe, Daniel](#)
Subject: Re: University City Community Plan Amendment Scoping Period
Date: Wednesday, December 16, 2015 6:31:33 AM

Dear Ms. Morrison,

I am disappointed in your response regarding requests to extend the comment period on the NOP for the University City EIR. I recommend that you reconsider your position on the need for an extension. I know a number of other people who have similarly requested extensions of this comment period.

I do not understand your explanation regarding opportunities for public participation throughout the EIR process. I am aware that there will be other comment periods after the EIR is drafted, but this is the critical time period when the scope of the Statement of Work will be finalized. That is a critical phase in the public participation process. Submitting comments about the NOP after the SOW is published as part of an RFP or RFQ, or after a contract is actually awarded, will be a complete waste of time unless those comments are submitted to a court of law in an effort to halt this contracting process long enough to correct it.

I work with a number of people who are well versed in the subject matter of this particular EIR effort. I also have extensive experience responding to Statements of Work from various government entities, and I seriously doubt that this SOW, as written, will yield a valid EIR. It has too many ambiguities, errors of omission, and simple errors in the language describing the subject matter to move forward with this document in its current form. However, it will take time to formulate thoughtful comments and recommendations about this. The last thing I want to do is spend my holiday period doing pro bono work for the City of San Diego when I have plans to spend that time with my family.

One glaring error in the NOP document is the statement that "This notice was published in the SAN DIEGO DAILY TRANSCRIPT..." This assertion appears twice in the NOP document -- on page 1 and page 3 of the PDF file. The San Diego Daily Transcript ceased publication in September. The SDDT internet domain name is currently for sale. The only conclusion that can be derived from this that the NOP notice was never actually published.

Please reconsider. This process needs a restart and/or an extension. There are too many glaring errors at this point in this critical process to proceed.

Respectfully,

Austin Speed
7110 Cather Ct.
San Diego, CA 92122
[619-665-6865](tel:619-665-6865)

On Tue, Dec 15, 2015 at 1:26 PM, Morrison, Susan <SIMorrison@sandiego.gov> wrote:

Good Afternoon:

Thank you for your comments regarding the Environmental Impact Report (EIR) to be prepared for the University Community Plan Amendment. The Notice of Preparation (NOP) you received and scoping meeting are just the beginning of the public input process for this environmental review document. There will be other opportunities for you to become involved throughout the project.

The scoping meeting to be held on December 16, 2015 is designed to get as much public input as possible on areas that need to be addressed in the EIR. This meeting will focus on environmental impacts the public would like thoroughly analyzed in the project's environmental document, rather than discuss the merits of the project, debate the various alternatives, or answer questions. We will simply be noting and recording comments on potential environmental impacts to the community as a result of the project.

While the NOP states a 30-day deadline for the receipt of comments, we will continue to accept any comments from the public throughout the EIR process. In addition, there will be additional opportunities to provide comment on the project, such as during public review of the draft environmental document and any public hearings. We will keep your name on our contact list so that we may contact you and continue to provide you with notices.

Thank you for your interest in this project.

Susan I. Morrison, AICP

Associate Planner

City of San Diego, Planning Department - Environmental

1010 2nd Avenue, MS 614C

San Diego, CA 92101

[\(619\) 533-6492](tel:(619)533-6492)

SIMorrison@sandiego.gov

From: [Barbara Fitzsimmons](#)
To: [PLN PlanningCEQA](#)
Cc: [Mayor Kevin Faulconer](#); [Councilmember Sherri Lightner](#)
Subject: U C EIR
Date: Saturday, January 02, 2016 5:27:20 PM

Dear Susan Morrison -

Having been a resident of South University City for more than 40 years, I feel that I am rather familiar with the area and its attendant advantages and problems. I am aware that there exists a community plan and that it is updated now and again, and that it is time for an update to the EIR.

The Rose Canyon Bridge has been in the U C Plan as far back as I can remember. The EIR should not address the removal of the Regents Road Project, as this would be a waste of time and public funds. The needs of our community require that when the bridge is built it be a four traffic lane structure with bike lanes and sidewalks.

I appreciate your consideration of this matter,

Barbara Fitzsimmons, resident
3437 Villanova Ave.
San Diego 92122

From: [bsavin](#)
To: [PLN_PlanningCEQA](#)
Subject: Regents Road Bridge
Date: Monday, December 07, 2015 2:28:43 PM

We are writing to you to express out objection to the timing of the NOP and Scoping meeting during the Holidays Season.

This is the busiest time of year, where most people are either away for winter break or busy with the holidays.

The fight for and against the Regents Road bridge has been going on for a very long time. We see no reason to wait with until after the Holidays Season.

Thank You for your consideration,

Barry and Rachel Savin



CITY OF SAN DIEGO

PLANNING DEPARTMENT
ENVIRONMENTAL ANALYSIS
PUBLIC SCOPING MEETING

University Community Plan Amendment / DECEMBER 16, 2015

This meeting is being held pursuant to the *California Public Resources Code Section 21083.9 et seq.*, and is provided to give the public and interested parties an opportunity to submit comments regarding the potential environmental impacts of the proposed project. This information will be used to develop the scope and content of the proposed Environmental Impact Report (EIR) for the project to be described at this meeting. Please record your comments in the space provided below and submit this form to City staff at the conclusion of the meeting or you can mail to the address noted on the back of this form. Thank You.

Comments:

Please consider as part of EIR factors/analysis the following:

1. Police/Fire protection access to South University City and surrounding communities
2. Longrange S.D. Transportation planning
3. Alternative North/South options that would safely allow/accommodate bicycles, pedestrians for daily use and emergency situations
4. Rose Canyon "fault" considerations
5. Changing speed limits on Regents Rd from 50 m.p.h. to 35 m.p.h.

Name Barry Bernstein Signature Barry A. Bernstein
Address 6482 Edmonkton Ave, S.D. 92122

Use back of sheet if additional space is necessary.

From: [Bob Starkey](#)
To: [PLN_PlanningCEQA](#)
Subject: UNIVERSITY COMMUNITY PLAN AMENDMENT
Date: Saturday, December 05, 2015 6:40:18 PM

Ms. Susan Morison
Environmental Planner
City of San Diego Planning Department
1010 Second Ave., MS 614C
San Diego, CA 92101

Dear Ms. Morison,

I strenuously object to the timing of the NOP and Scoping meeting during the busy holiday season which will unfairly limit participation. The comment period must be extended another 30 days beyond January 1st. This is critical to obtain fair comments from both sides of the issue.

Extension of Regents Road across Rose Canyon has always been planned since the initial University Community plan and every plan update since. I served on the first plan update (approximately 1971 or 1972 and it was obvious then as it is now that Regents Road needed to be completed across the canyon.

And, the opponents of the bridge argue it will destroy Rose Canyon. The canyon has survived a sewer line and railroad tracks. Note that there is already a bridge across the canyon at Genesee and the canyon has not been ruined by it. There are also bridges across San Clemente Canyon at Regents Road and Genesee Avenue and both canyons have survived in all their beauty.

Robert W. Starkey
4341 Pavlov Avenue
San Diego, CA 92122

DEPARTMENT OF TRANSPORTATION

DISTRICT 11, DIVISION OF PLANNING

4050 TAYLOR ST, M.S. 240

SAN DIEGO, CA 92110

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January 7, 2016

11-SD-VAR
(5, 52, 56, 805)University
Community Plan Amendment
SCH# 2015121011

Ms. Susan Morrison
City of San Diego
Planning Department
1010 Second Avenue, Suite 1400, MS 614C
San Diego, CA 92101

Dear Ms. Morrison:

Thank you for including the California Department of Transportation (Caltrans) in the environmental review process for the City of San Diego's (City) University Community Plan Amendment (Plan), for which the areas are served by Interstate 5 (I-5), State Route 52 (SR-52), State Route 56 (SR-56) and Interstate 805 (I-805). The mission of Caltrans is to provide a safe, sustainable, integrated, and efficient transportation system to enhance California's economy and livability. The Local Development-Intergovernmental Review (LD-IGR) Program reviews land use projects and plans to ensure consistency with our mission and state planning priorities of infill, conservation, and efficient development. To ensure a safe, efficient, and reliable transportation system, we encourage early consultation and coordination with local jurisdictions and project proponents on all development projects that utilize the multi-modal transportation network.

Caltrans has reviewed the Notice of Preparation (NOP) for the University Community Plan Amendment draft Environmental Impact Report (EIR), and has the following comments:

The Caltrans Traffic Impact Study Guidelines should be used for analyzing Caltrans facilities. The information is available at:

http://www.dot.ca.gov/hq/tpp/offices/ocp/igr_ccqa_files/tisguide.pdf

Caltrans recognizes that there is a strong link between transportation and land use. Development can have a significant impact on traffic and congestion on State transportation facilities. In particular, the pattern of land use can affect both total vehicle miles traveled and the number of trips. Caltrans strongly encourages local agencies to work towards a safe, functional, interconnected, multi-modal system.

Caltrans supports the concept of a local circulation system that is pedestrian, bicycle, and transit-friendly in order to enable residents to choose alternative modes of transportation. As a result,

Ms. Susan Morrison

January 7, 2016

Page 2

potential transit mitigation for development impacts should also be analyzed, such as improved transit accommodation through the provision of park and ride facilities, bicycle access, signal prioritization for transit, or other enhancements that can improve mobility and alleviate traffic impacts to State facilities.

The City should continue to coordinate with Caltrans to implement necessary improvements at intersections and interchanges where the agencies have joint jurisdiction, as well as coordinate with Caltrans as development proceeds and funds become available to ensure that the capacity of on-/off-ramps is adequate.

Please note that any work performed within Caltrans Right of Way (R/W) (e.g. for community gateways in the Land Use and Urban Design Elements) will require discretionary review and approval by Caltrans and an encroachment permit will be required for any work within the Caltrans R/W prior to construction. Additional information regarding encroachment permits may be obtained by contacting the Caltrans District 11 Encroachment Permits Office at (619) 688-6158 or visiting the following website: <http://www.dot.ca.gov/hq/traffops/developserv/permits/>. Early coordination with Caltrans is strongly advised for all encroachment permits.

Caltrans appreciates the continued coordination with City staff and community representatives on this Plan. If you have any questions, please contact Kimberly Dodson at (619) 688-2510.

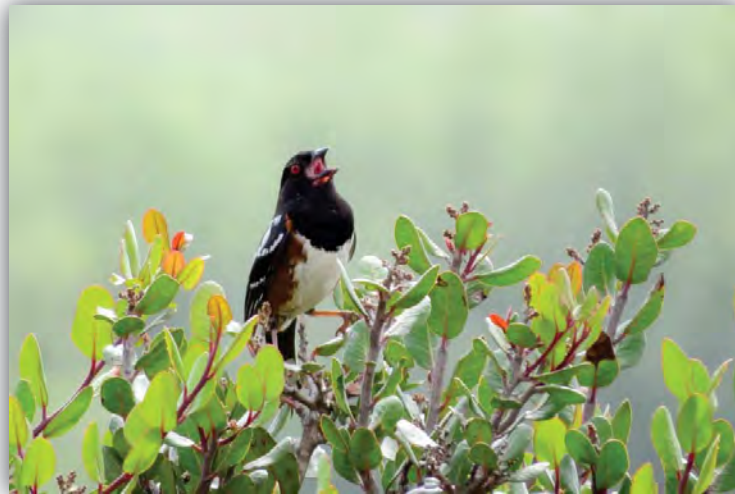
Sincerely,

A handwritten signature in blue ink, appearing to read 'J. Armstrong', is written over a faint, illegible typed name.

JACOB ARMSTRONG, Branch Chief
Development Review Branch

Canyon Sewer Cleaning Program and Long Term Sewer Maintenance Program Progress Report

City of San Diego
Public Utilities Department



2014 Annual Report
July 1, 2013 – June 30, 2014



Cover: Top: Spotted Towhee singing on lemonadeberry (Paver), Bottom: Sewer Repair and Manhole

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ACRONYMS AND ABBREVIATIONS

ACOE	Army Corps of Engineers
BMP	Best Management Practices
CDFW	California Department of Fish and Wildlife
CIP	Capital Improvement Project
DSD	Development Services Department
MEAP	Long Term Maintenance and Emergency Access Plan
MHPA	Multiple Habitat Planning Area
OSCAC	Open Space Canyons Advisory Committee
PEIR	Programmatic Environmental Impact Report
PEP	Plant establishment period
Program	Canyon Sewer Cleaning Program and the Long-term Canyon Sewer Maintenance Program
Public Utilities	City of San Diego Public Utilities Department
ROF	Redirection of Flow
SCR	Substantial Conformance Review
WWC	Wastewater Collection Division

EXECUTIVE SUMMARY

In response to an Administrative Order from the U.S. Environmental Protection Agency, in an effort to reduce sewer spills and beach closures, and under the direction of Council Policies 400-13 and 400-14, the City of San Diego's Public Utilities Department (Public Utilities) has adopted the Canyon Sewer Cleaning Program and the Long-term Canyon Sewer Maintenance Program (Program) to access, clean, and repair miles of sewer infrastructure located in canyons and other environmentally sensitive areas.

A Programmatic Environmental Impact Report (PEIR) was prepared to study the Program and in July 2004 the City of San Diego approved Coastal Development Permit No. 13506 and Site Development Permit No. 13507 for the Program.

The objectives of the Program are:

- To complete the inspection and cleaning of City of San Diego sewer infrastructure located in canyons and other environmentally sensitive areas.
- To identify and implement efficient, effective, and environmentally sensitive means to accomplish the necessary canyon sewer cleaning activities.
- To provide for long-term maintenance of canyon sewer infrastructure, recognizing that availability of access to the infrastructure is essential for an effective long-term program, in accordance with Council Policy 400-13.
- To evaluate and pursue options to redirect sewage flows out of canyons and into street sewer lines or other accessible areas, where feasible and appropriate pursuant to Council Policy 400-14.

This annual report, as required by the site development permit condition 27, provides a Progress Report to the Open Space Canyons Advisory Committee (OSCAC) on the Program for the year from July 1, 2013 through June 30, 2014. This report provides the status of all Program activities within the reporting year, including habitat mitigation, long term access planning and implementation, construction and emergency projects, and 25 month revegetation and restoration projects.

LONG TERM ACCESS PROJECTS

Long Term Sewer Access Projects provide access paths to sewer infrastructure for ongoing maintenance, inspections, and cleaning. One of the first steps in determining whether an access path is needed is to prepare a redirection of flow (ROF) study. A ROF study evaluates the economic feasibility of removing all or part of the sewer from an environmentally sensitive area or canyon versus providing access to the sewer if it remains in place.

When redirection of flow is found to be infeasible from all or portions of environmentally sensitive areas/canyons, Public Utilities staff develop a Long Term Maintenance and Emergency Access Plan (MEAP) in accordance with Policy 400-13. Public Utilities staff prepares and submits a Substantial Conformance Review (SCR) packages to the Development Services Department (DSD) for a determination whether the proposed mitigation, restoration, and access planning for individual canyon areas or project is in conformance with the PEIR and Program master permits. Project specific design plans are then prepared as necessary to provide specific direction on access improvements and construction that include additional information necessary to obtain regulatory agency permits. Separate permits or clearances are obtained from the regulatory agencies prior to implementation of long term access projects.

The following canyons are in various stages of long term access planning and implementation:

- 32nd Street – Sewer access paths located in upland areas have had wood chips installed and are currently being used by the Wastewater Collection (WWC) Division. Public Utilities staff received regulatory agency permit approval to construct access path improvements at streambed crossings; however, Public Utilities is currently analyzing an alternate path alignment to avoid wetland impacts to streambeds. Public Utilities is working with Real Estate Assets Department to acquire an easement to build a portion of the upland access path on private property. The new access paths will be constructed by the WWC Division.
- Alvarado – The long term sewer access plan has been approved in concept and the detailed access path design for this project is complete. Public Utilities staff is working on the environmental permits, property acquisition, and developing contract documents.
- Black Mountain – Implementation of long term sewer access for this canyon has been completed. Public Utilities staff are working with the Park and Recreation Department on finalizing a Memorandum of Understanding for the ongoing maintenance and use of access paths.
- Park Mesa – City forces completed construction of the long term access path in the summer of 2011. The project required easement acquisition from four

property owners. All easements have been acquired. This access project is complete and the WWC Division will continue to maintain the path for ongoing sewer inspections, cleaning and maintenance.

- Rancho Mission – Public Utilities reassessed the canyon access plan, identified an alternative access using existing paths, and eliminated the need for one stream crossing. Access path improvements on the east side of Margerum Avenue were completed by City forces in November 2011. Environmental permits were obtained from the regulatory agencies in 2013 to construct an improved streambed crossing. The design and construction of the streambed crossing on the west side of Margerum Avenue was completed in November of 2013.



Rancho Mission – Improved Streambed Crossing

- Tecolote East – Design drawings have been prepared that include numerous streambed crossing improvements. Public Utilities staff has started on the resource agency permit applications and developing contract documents for constructing the access path improvements. Improvements will be necessary to provide access to the manholes located in the streambed areas.
- Norfolk Canyon – Public Utilities staff is awaiting final regulatory agency approvals for the upsizing of one pipe culvert along the existing access path. Following the receipt of the permits, City crews shall initiate this work.
- Home Avenue Trunk Sewer – Public Utilities staff is in the process of completing the SCR submittal, including the Long Term Access Plan, MEAP, and environmental studies.
- Lopez Manhole 13 – A partial implementation of the long term access project in Lopez Canyon occurred during this reporting period. A manhole that had been

previously inaccessible for cleaning was accessed in the Fall of 2013. City crews tracked over low growing vegetation to gain access to the manhole. No grading, filling, or permanent improvements will be made to the new sewer access path.



Lopez Canyon –Towing Cleaning Equipment to Manhole 13

- South Chollas – Public Utilities completed the Long Term Access plan, MEAP, and all preliminary environmental studies. Staff has submitted the SCR package to the DSD for approval. Following approval, paths located in upland areas will be constructed by City forces. Detailed design drawings will be prepared for the streambed crossing improvements.
- North, Central, and Southern Tecolote Canyon – A Long Term Access Plan Technical Memorandum for all three sections of Tecolote Canyon was completed in 2013 and incorporated into a planning study and scope of a larger Capital Improvement Projects (CIP) project. The Technical Memorandum includes the design criteria of all access paths and streambed crossing improvements. The design criteria will be included in the design of the CIP Project when it moves forward.
- VanNuys Canyon – A new ROF Study and Access Recommendation have been completed and the project will be proceeding with long term access design.
- Mt. Elbrus – In November, 2011, WWC installed a prefabricated fiberglass bridge in Mt. Elbrus Canyon as partial long term access implementation. Public Utilities staff is currently designing three additional stream crossing improvements and is starting on agency permits for anticipated construction in 2015.



Mt. Elbrus Canyon- Long Term Access Area In Design

- Manning Canyon – Public Utilities is beginning the process for the SCR submittal, including the Long Term Access Plan, MEAP, erosion control plan and environmental studies.
- Interstate (I)-15 & Balboa – Public Utilities is beginning a ROF study to determine if canyon sewer facilities can be abandoned and if sewer flows can be redirected to Right-Of-Way areas.

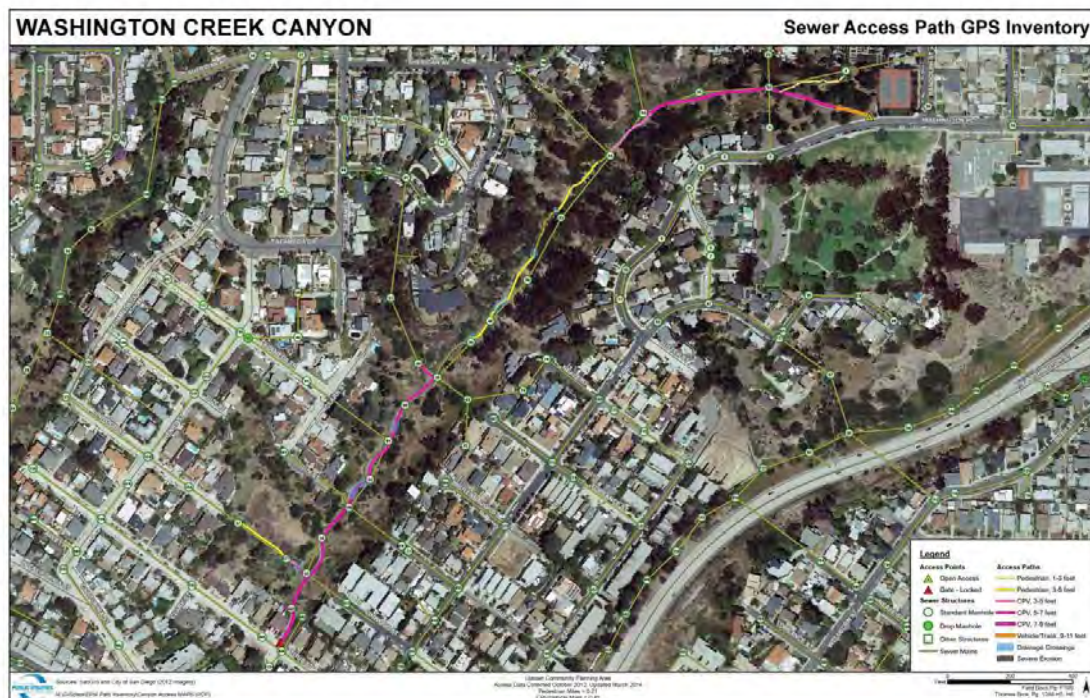
MAINTENANCE, MONITORING, AND MAPPING

Wastewater Collection Division staff coordinated closely with Environmental Staff (Environmental Section) in ensuring daily activities were in compliance with the Program’s master permit, agency permits, and environmental regulations.

Environmental training is provided to all Public Utilities staff working in canyons/environmentally sensitive areas. Crews are directed to contact staff in the Environmental Section for guidance and support for work that may impact sensitive resources.

The Environmental Section reviews daily field work reports, facilitates monthly meetings to discuss and review all work in canyons, obtains permits, and provides daily support to field crews. Work conducted in canyons/environmentally sensitive areas is monitored by the Environmental Section. Bird nesting surveys, vegetation and sensitive species mapping, jurisdictional delineations and other biological surveys are completed by the Environmental Section for daily WWC operation and maintenance of sewer lines in canyons.

Public Utilities has increased its efforts to inventory and map existing access to sewers in canyons. This inventory provides information on existing access conditions, identifies access needs and areas of concern), and facilitates ongoing maintenance. To date, 165 miles of pedestrian and vehicular paths have been mapped with the GPS data for 136 canyon areas. Vehicle access path data is updated quarterly and is available on SanGIS.



Access Path Inventory Map for Washington Creek Canyon

CONSTRUCTION AND EMERGENCY PROJECTS

During this reporting period seven CIP projects were completed or are still in construction: GJs 616, 672A, 693, 703A, 787, and GJ 799 Alvarado TS PH IIIA. Planning and permitting is complete or in process for a number of additional projects that are anticipated once contracting is complete or funding is available. These include Group Jobs 833, 836, 965, 966, Sewer Rehabs AG-1, AB-1 and Z-1, Skylark Canyon sewer, Rose Canyon TS Joint Repair, Tecolote Canyon and Manning Canyon sewer abandonment projects. These jobs are managed by the Engineering and Capital Projects, Public Works Department.

Since July of 2013, emergency projects and/or pipeline/manhole repair projects occurred in the following canyons or environmentally sensitive areas:

Emergencies

- Buchanan Canyon Sewer Blockage (blocked pipe, pipe repair, access)
- Camino Del Rio South (blocked pipe, buried manhole, cleaning)
- Tecolote North Pipe Repair (pipe repair and protection)
- Spruce Mh 220 (manhole replacement)
- Siesta Drive (pipe repair)
- El Camino Real (Sewer Spill)

Other construction projects

- I-15 Buried Manhole 9 (manhole locate and raise)
- Loma Pass Buried Manhole (manhole locate and raise)
- Market Street MH (manhole locate and raise)
- San Diego River West (temp access, manhole raise, cleaning)
- Famosa Slough Pipe Repair (spot repair)
- Spruce Canyon Pipe Repair (pipe repair)
- Manning Canyon Sewer Repair (pipe repair)
- Camino Del Rio North Mh Replacement (manhole maintenance)
- Switzer Canyon MH 152 Access (access creation, cleaning)
- Washington Creek Access Path (path improvements)
- Switzer Sinkhole Repairs (access path maintenance)
- Ash Street and Granada Repair (pipe repair)
- 28th Street Access (path maintenance)
- Sweetwater MH 3 Repair (manhole maintenance)
- Juniper Street Spot Repair (pipe repair)
- Tecolote North Access (path maintenance)
- Pump Station 77 Force Main Inspection (pipeline inspection)
- Old Town McCoy House Sewer Repair (pipe repair)
- Otay Valley Trunk Sewer Pipe Protection (pipe protection)

Public Utilities crews completed access path maintenance in multiple canyon areas to facilitate access for cleaning, inspections and maintenance. Path maintenance is usually limited to trimming or mowing vegetation that has grown on the pathways. Maintenance on the access path precedes manhole cleaning and maintenance.

Public Utilities staff manages emergency and non-CIP construction projects. Environmental review, monitoring, and reporting are done in adherence with the Program. Biological assessments have been prepared and permits have been obtained as necessary for these emergency and construction projects. Following construction, revegetation and/or restoration has been implemented in accordance with the Program.



Spruce Canyon Pipe Repair



San Diego River West Manhole Raise and Cleaning



Buchanan Emergency Sewer Blockage Emergency Access and Repair

25 MONTH REVEGETATION AND RESTORATION PROJECTS

Conditions of the Master permit require effective erosion control of access paths and restoration of temporarily impacted areas outside of permanent access paths following construction. Each impact area is monitored and maintained for a period of no less than 25 months.

Revegetation sites include all areas required for permanent access to utilities including the access paths, turn-arounds, and work areas around manholes. When new access paths and permanent access areas are created, revegetation is required. The goal of revegetation is successful erosion control. Maintenance and monitoring of revegetation areas may include hydroseeding or hand-seeding, weeding, mulching or installing wood chips on the path, installation of temporary Best Management Practices (BMPs), site monitoring or a combination of the above treatments.

Restoration sites are areas impacted outside of permanent access areas. Restoration areas are typically staging areas, emergency access or work areas, pipeline repair areas, unauthorized impact areas, or areas disturbed as a result of temporary widening of pathways. The goal of habitat restoration is re-establishment of native habitat. Restoration areas shall obtain native plant coverage equal to the native species present in the adjacent area or 30% coverage, whichever is greater. Restoration areas shall support no more than 1% perennial weeds and no more than 10% annual weeds during the 25 month maintenance period. Maintenance and monitoring of restoration areas may include hydroseeding or hand-seeding, installation of container plants, weeding, installation of temporary BMPs, temporary irrigation, site monitoring or a combination of the above treatments.

Seed and plant material used for revegetation and restoration efforts is from locations within 25 miles of the coastline in San Diego County. Maintenance and monitoring of all sites continues for 25 months or until successful erosion control is achieved on the paths and/or restoration goals are met outside of the paths.

During this reporting year, ten (10) sewer revegetation projects were completed. In addition to eleven (11) ongoing projects, nine (9) additional sites were installed and maintenance and monitoring of these sites was initiated.

Updates on the status of the revegetation and restoration projects are a regular agenda item at OSCAC's meetings. See Attachment A for the July 2014 Revegetation and Restoration Projects Status update table.



Pump Station 77 Forcemain Restoration Area

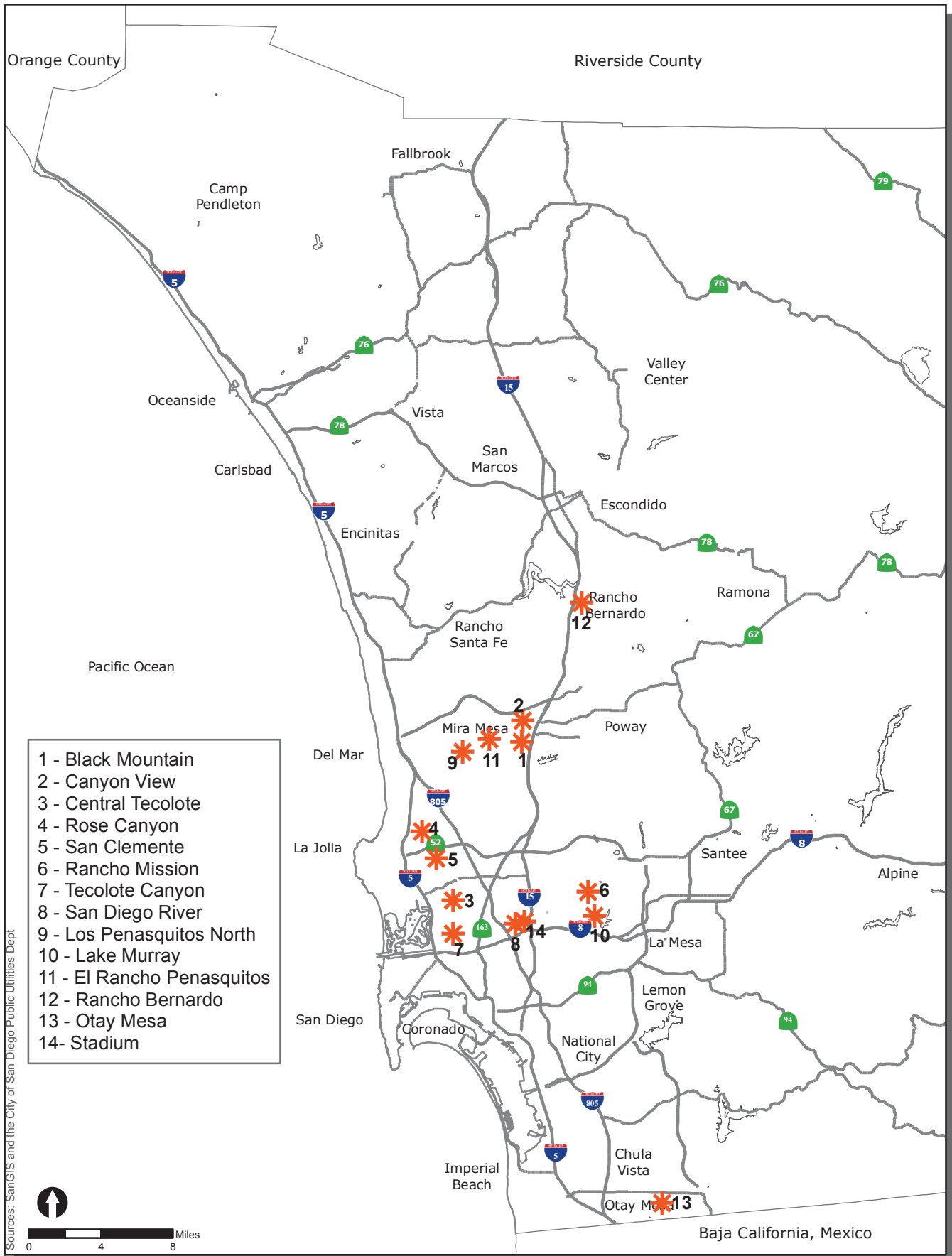


Spruce MH 220 Replacement Revegetation (erosion control) Project

MITIGATION PROJECTS

In accordance with applicable local, state, and federal regulations, restoration, revegetation, or mitigation is required for significant biological impacts resulting from the Program, such as the creation of access paths through environmentally sensitive areas, emergency repairs, and pipeline repair projects. In order to mitigate these impacts, Public Utilities staff has identified and implemented a number of habitat mitigation projects located within various watersheds where past, current, or future impacts have or may occur. These mitigation sites are designed and built to accommodate numerous Public Utilities projects. Allocation of mitigation is completed as each project is planned, permitted and constructed. Post construction adjustments are made to mitigation assignments based on actual project impacts. Project impacts and mitigation assignments are tracked internally within the Canyon Database. A summary of acreages available, assigned and the balance is included as Attachment B. A more detailed summary of assignments is included as Attachment C.

The location of these projects is shown in Figure A. The status of each habitat mitigation project is summarized below.



- 1 - Black Mountain
- 2 - Canyon View
- 3 - Central Tecolote
- 4 - Rose Canyon
- 5 - San Clemente
- 6 - Rancho Mission
- 7 - Tecolote Canyon
- 8 - San Diego River
- 9 - Los Penasquitos North
- 10 - Lake Murray
- 11 - El Rancho Penasquitos
- 12 - Rancho Bernardo
- 13 - Otay Mesa
- 14 - Stadium

Sources: SanGIS and the City of San Diego Public Utilities Dept

**PUD Mitigation Sites
Overview Map**

**FIGURE
A**

Rose Canyon Mitigation Project

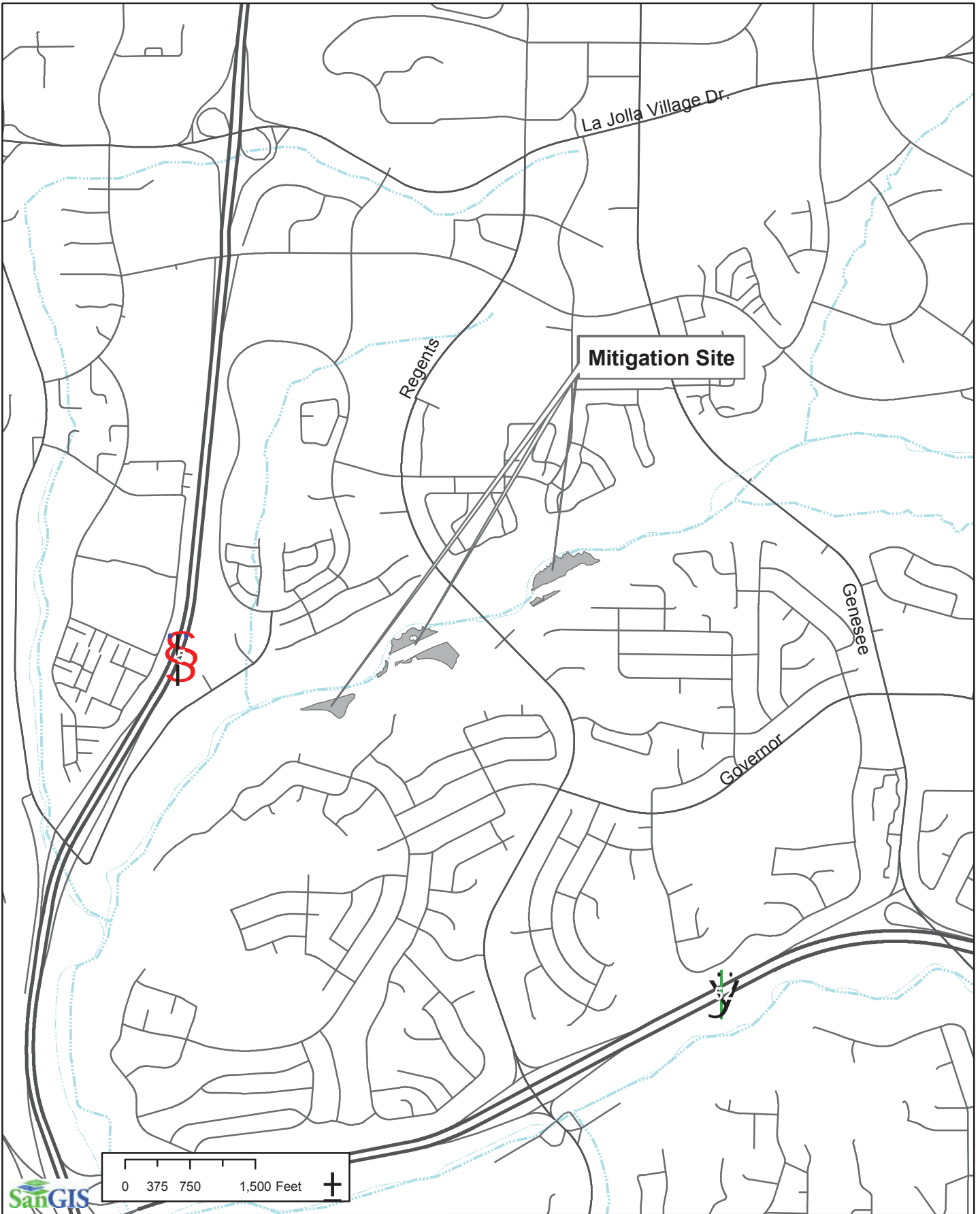
The Rose Canyon Mitigation Project is located in the Rose Canyon Open Space Park, starting approximately one half mile west of Genesee Avenue and continuing another one half mile further west into the park (Figure 4).

Approximately 4.36 acres of oak riparian forest, southern cottonwood-willow riparian forest, and mule fat scrub were created adjacent to Rose Creek. Approximately 3.67 acres of Diegan coastal sage scrub habitat was planted on the upland areas.

Construction was initiated in September 2007 and included clearing of non-native vegetation, grading, installation of a temporary irrigation system, planting, hydroseeding, fencing, and sign installation. The initial revegetation installation was accepted in March 2008, when the site entered the 120-day plant establishment period (PEP). The project entered the 5-year maintenance period on July 15, 2008. The project has completed 5-year of maintenance and is awaiting Corps regulatory sign-off. Vegetative cover at the site is very high, uplands habitat exceeds 80% cover and has a high diversity of species that includes California sagebrush (*Artimisia californica*), white sage (*Salvia apiana*), coyote bush (*Baccharis pilularis*), and San Diego goldenbush (*Isocoma menziessii*). The wetland creation habitat exceeds 100% cover in sections of the project area with canopy height reaching 10 to 15 feet; a number of cottonwood (*Populus* spp.) and willow (*Salix* spp.) recruits were recently observed on the site. Available mitigation acreage below reflects actual acreage of habitats restored at the end of the year 5 maintenance period.

Mitigation Credits			
Habitat Type	Acres	Assigned	Balance
Riparian Forest- creation	5.05	3.44	1.87
Riparian Forest – enhancement	0.61	0.35	0.26
Diegan Coastal Sage Scrub	4.75	2.95	1.80
Native Grassland	0.28	0.20	0.08





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Rose Canyon Mitigation Site
Vicinity Map

Figure 4

From: [Carole](#)
To: [PLN_PlanningCEQA](#)
Subject: University Community Plan Amendment -- Internal Order 12002051/11003327 Schedule Number Pending
Date: Monday, January 04, 2016 11:01:01 PM
Attachments: [Comment Letter January 4, 2016.pdf](#)

Carole Pietras
6917 Lipmann Street
San Diego CA 92122
858 452-8378

rcpietras@sbcglobal.net

January 4, 2016

Susan Morrison, Environmental Planner

Sent Via email to:

Planningceqa@sandiego.gov

City of San Diego Planning Dept.

1010 Second Av., MS 614C

San Diego CA 92101

Subject: University Community Plan Amendment -- Internal Order 12002051/11003327
SCH. No. *Pending*

Dear Ms. Morrison,

This letter is an addition to my letter of December 14, 2015 sent to you via email. Once again, I request the comment period be extended. It is very disappointing that the comment period for a project of this importance --not only to people living in the University Community Plan area but also to all who work, shop, attend school, receive medical treatment and visit hospitals and clinics in the community plan area --has been held during the holidays when most organizations, including the City Council and the UCPG, do NOT meet and people are traveling, on vacation, celebrating the holidays and having family gatherings.

Because of holiday travel, limited internet connection and the comment period being held during the busy holiday season, I had very little time to read the information and formulate my comments.

1. The NOP and Scoping Document are confusing. Is this a DRAFT EIR or an EIR? Why are both terms used throughout the document?

The NOP refers to the preparation of an Environmental Impact Report (EIR), Page 1 of the December 2, 2015 refers to a Draft EIR in the Subject. EIR and Draft EIR appear to both be used throughout the document. I realize this is a multi-step process, but which is it?

2. "The Project" is confusing and contradictory.
What is "the project?" Please see sentences I have underlined below.

PROJECT DESCRIPTION. Page 2 of the NOP states: "This EIR analyzes the impacts related to removing the Genesee widening and Regents Road Bridge project as well as 5 project alternatives."

Farther down the same page, **Recommended Finding:** “Pursuant to Section 15060(d) of the CEQA guidelines, it appears the proposed project may result in significant environmental impacts in the following areas...” and goes on to list the various environmental impacts. The Council Resolution certainly suggests removing both the Regents Road Bridge and the Genesee Widening from the UCP. The recommended finding does not seem realistic with regard to removing these two projects from the plan that do not exist now.

The UC North South Corridor Committee studied several of the various alternatives. These previous Environmental studies should be made available to the consultant working on the present EIR, DEIR.

3. **TRAFFIC STUDY** – The entire length of Governor Dr. from 805 on the east, to the terminus at Stresemann must be studied. The intersections are not enough.

Governor Dr. is the ONLY east/west street that runs the length of the community. There are no parallel streets that do so. Consequently, with the exception of Pennant Way on the West side of Regents Rd., Radcliffe Lane on the West side of Genesee, and a driveway from The Park condominium development that accesses Genesee Northbound just south of Governor Dr, and a driveway from Regency Villas senior condominium complex on Genesee, all other streets intersect with Governor Dr. Vehicles, pedestrians and bicyclists travel on Governor Dr to access 805, Genesee north and south, 52, and Regents Rd.

There are 6 stop lights on Governor Dr. from Regents Rd. to Genesee Ave. plus stoplights at Edmonton and Agee on Governor Dr. east of Genesee. This is indicative of the amount of traffic on Governor Dr. Moving from the east end of Governor Dr. to the west, are the following: Summers Governor Industrial Park, The First Baptist Church, The University Village apartments which have approval to double in size to 1102 units (and are in the construction process as Town Park Villas, La Jolla del Rey and UC Village), McElroy Field at University Gardens Park at Governor and Gullstrand, Carl’s Jr., University Square Shopping Center and Shell Gas Station (at least 6 driveways from the east end of Genesee through the end of the shopping center), Curie Elementary School across from the shopping center, three additional gas stations located at the intersection of Governor and Genesee, Chabad Center, All Saints Lutheran Church and preschool, Standley Middle School, Swanson Pool, Standley Park and Recreation Center, Spreckels Elementary School, shopping center at Governor and Regents, Our Mother of Confidence Catholic Church, small shopping center west of Regents on Governor Dr., UC United Church, Church of the Latter Day Saints Reading Room. Our park facilities are heavily used by leagues, tournaments and residents. Every one of these entities generates traffic. It is important that the entire length of Governor Dr. is included in the traffic study.

In addition, all of the projects under construction and pending construction in the UC Plan area must be included when analyzing the project and project alternatives.

Thank you for reviewing these comments. I will have additional comments after further review of the scoping document.

Respectfully,
Carole Pietras

From: [Carol Stultz](#)
To: [PLN PlanningCEQA](#)
Subject: UNIVERSITY COMMUNITY PLAN AMENDMENT Schedule No.: Pending (Internal Order 12002051/11003327)
Date: Wednesday, December 16, 2015 3:42:47 PM

Dear Ms. Morrison,

UNIVERSITY COMMUNITY PLAN AMENDMENT Schedule No.: Pending (Internal Order 12002051/11003327)

I am a resident of the UTS community.

Please extend the comment period for the NOP and Scoping meeting to the end of January. It is impossible for the citizens who are affected by this proposal to find the time to make comments during this busy December. It is busy for all, and most organizations do not meet in December.

Sincerely,

Carol Stultz
4453 Via Precipicio
San Diego, CA 92122

Carole Pietras
6917 Lipmann Street
San Diego CA 92122
858 452-8378
rcpietras@sbcglobal.net

January 4, 2016

Susan Morrison, Environmental Planner
City of San Diego Planning Dept.
1010 Second Av., MS 614C
San Diego CA 92101

Sent Via email to: Planningceqa@sandiego.gov

Subject: University Community Plan Amendment -- Internal Order 12002051/11003327
SCH. No. *Pending*

Dear Ms. Morrison,

This letter is an addition to my letter of December 14, 2015 sent to you via email. Once again, I request the comment period be extended. It is very disappointing that the comment period for a project of this importance --not only to people living in the University Community Plan area but also to all who work, shop, attend school, receive medical treatment and visit hospitals and clinics in the community plan area --has been held during the holidays when most organizations, including the City Council and the UCPG, do NOT meet and people are traveling, on vacation, celebrating the holidays and having family gatherings.

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Council Resolution certainly suggests removing both the Regents Road Bridge and the Genesee Widening from the UCP. The recommended finding does not seem realistic with regard to removing these two projects from the plan that do not exist now.

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Thank you for reviewing these comments. I will have additional comments after further review of the scoping document.

Respectfully,
Carole Pietras

Carole Pietras
6917 Lipmann Street
San Diego CA 92122
858 452-8378 Cell 619 995-2963
rcpietras@sbcglobal.net

Susan Morrison, Environmental Planner
City of San Diego Planning Dept.
1010 Second Av., MS 614C
San Diego CA 92101

Sent Via email to: Planningceqa@sandiego.gov

Subject: University Community Plan Amendment -- Internal Order 12002051/11003327
SCH. No. Pending.

Dear Ms. Morrison,

My husband and I have been residents of University City for over 40 years. I have been active in the community and served on the UC North/South Transportation Corridor Committee in 2003, so I am very familiar with the Regents Road bridge and Genesee widening issues. I was present at the November 10th University Community Planning Group (UCPG) meeting when the Planning Dept. representative announced the NOP would be out December 2nd, the Scoping Meeting would be December 16th, and the 30 day public comment period would commence December 2nd. Along with others, I objected to the timing and asked why this was going to take place during the height of the holiday season when people are busy with holiday activities and travel, and response would be limited. The chair of the UCPG also opposed the timing. The answer given-- **that the Mayor and Council District 1 office wanted the process completed before the November election was both disturbing and surprising.** These are my concerns:

The NOP is flawed and should be reissued. At the beginning and again at the end of the NOP, the notice indicates publication in the San Diego Daily Transcript on December 2nd. That newspaper ceased publication September 1, 2015. Also, the Project Number is listed as Pending. Is that due to the rush to get this done during the holidays?

This is not just a Council District 1 issue. The thousands of people who travel on Genesee every day to get to work, schools, businesses, medical appointments, hospitals and research centers in the Golden Triangle live in various parts of the city. They should have a voice in this matter but are unlikely to because of the timing.

In fairness to all, the public comment period should be extended to at least the end of January, and the Scoping Meeting should be held in January. Most organizations and associations, including the UCPG, do not meet in December. The City Council is on Legislative Recess most of December, yet the public is expected to find the time to read and comment on this important matter during the holiday period by January 1st. (Jan. 2nd because of the holiday.) Last year, only bridge opponents had advance notice and spoke at the Mayor's press conference at Rose Canyon announcing the CPA. Bridge supporters found out accidentally the morning of the conference. At a community meeting a few weeks later, the Mayor promised an open and fair process. My husband, Richard, and I expect no less and formally object to the timing and noticing.

Sincerely,


Carole Pietras

From: [Carole](#)
To: [PLN_PlanningCEQA](#)
Cc: rcpietras@sbcglobal.net
Subject: UNIVERSITY COMMUNITY PLAN AMENDMENT - Schedule No.: Pending (Internal Order 12002051/11003327).
Date: Monday, December 14, 2015 11:15:07 AM
Attachments: [Letter re NOP, SCOPING MEETING CONCERNS.pdf](#)

Carole Pietras
6917 Lipmann Street
San Diego CA 92122
858 452-8378 Cell 619 995-2963
rcpietras@sbcglobal.net

Susan Morrison, Environmental Planner
Planningceqa@sandiego.gov
City of San Diego Planning Dept.
1010 Second Av., MS 614C
San Diego CA 92101

Sent Via email to:

Subject: University Community Plan Amendment -- Internal Order 12002051/11003327
SCH. No. *Pending*

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My husband and I have been residents of University City for over 40 years. I have been active in the community and served on the UC North/South Transportation Corridor Committee in 2003, so I am very familiar with the Regents Road bridge and Genesee widening issues. I was present at the November 10th University Community Planning Group (UCPG) meeting when the Planning Dept. representative announced the NOP would be out December 2nd, the Scoping Meeting would be December 16th, and the 30 day public comment period would commence December 2nd. Along with others, I objected to the timing and asked why this was going to take place during the height of the holiday season when people are busy with holiday activities and travel, and response would be limited. The chair of the UCPG also opposed the timing. The answer given-- **that the Mayor and Council District 1 office wanted the process completed before the November election was both disturbing and surprising.** These are my concerns:

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Sincerely,

Carole Pietras
(signed letter attached)

From: [Carolyn Quinney](#)
To: [PLN PlanningCEQA](#)
Subject: Rose Canyon Bridge
Date: Monday, December 14, 2015 2:39:44 PM

I currently live in the Valencia project of La Jolla Colony with property bordering Rose Canyon. I am in agreement to the EIR findings of:

“Both road projects are considered antiquated by transportation planning experts. Increases in roadway capacity do nothing more than encourage additional motorists to travel on these new or widened roads, thus not improving traffic congestion in the long run. These road projects would also increase greenhouse gas emissions, irreparably damage Rose Canyon Open Space Park, and degrade the livability of our residential neighborhoods.”

Unfortunately I cannot attend the meeting on Wednesday, the 16th so have submitted my “voice” in this form.

Sincerely,

Carolyn Quinney
4205 Caminito Cassis
SD 92122



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

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



December 31, 2015

Ms. Susan Morrison, Environmental Planner
City of San Diego Planning Department
1010 Second Avenue, MS-614C
San Diego, California 92101

Subject: Comments on the Notice of Preparation for the University Community Plan Amendment Draft Environmental Impact Report (Project Number 120112051/11003327; SCH No. 2015121011)

Dear Ms. Morrison:

The California Department of Fish and Wildlife (Department) has reviewed the above-referenced Notice of Preparation (NOP) for the University Community Plan Amendment Draft Environmental Impact Report (DEIR), dated December 2, 2015. The following statements and comments have been prepared pursuant to the Department's authority as Trustee Agency with jurisdiction over natural resources affected by the project (California Environmental Quality Act [CEQA] Guidelines §15386) and pursuant to our authority as a Responsible Agency under CEQA Guidelines section 15381 over those aspects of the proposed project that come under the purview of the California Endangered Species Act (CESA; Fish and Game Code § 2050 et seq.) and Fish and Game Code section 1600 et seq. The Department also administers the Natural Community Conservation Planning (NCCP) program, a California regional habitat conservation planning program. The City of San Diego (City) participates in the NCCP program by implementing its approved Multiple Species Conservation Program (MSCP) Subarea Plan (SAP).

According to the NOP, the DEIR would analyze removing the Genesee Avenue widening and Regents Road Bridge projects from the University Community Plan (UCP) Transportation Element, along with considering six project alternatives. The alternatives are as follows: (1) widening of Genesee Avenue from four to six lanes between State Route 52 and Nobel Drive and constructing Regents Road Bridge (consisting of two separate, parallel two lane bridge structures across Rose Canyon to connect the existing termini of that street at the north and south rims of the canyon); (2) widening of Genesee Avenue and constructing Regents Road Bridge within future implementation of the UCP; (3) widening Genesee Avenue and removing the Regent Road Bridge project from the UCP; (4) constructing Regents Road Bridge and removing the Genesee Avenue widening project from the UCP; (5) constructing a bridge over Rose Canyon for emergency access, transit, pedestrian, and bicycle use only with a Genesee Avenue widening; and (6) constructing a bridge over Rose Canyon for emergency access, transit, pedestrian, and bicycle use only without a Genesee Avenue widening.

Portions of the project area are within the Multiple Habitat Planning Area (MHPA) of the City's MSCP SAP. Specifically, Rose Canyon (Rose Canyon Open Space Park) would be affected by the Regents Road Bridge and Genesee Avenue widening. The extent of the widening of Genesee Avenue could affect a portion of San Clemente Canyon (Marian Bear Memorial Park) depending on modifications to travel lanes (widening described to occur between State Route 52 and Nobel Drive).

The Department along with the U.S. Fish and Wildlife Service previously provided joint comment letters (respectively, April 15, 2004, April 14, 2005, and July 31, 2006) to the City's Development Services Department during the NOP, draft EIR, and final EIR phases for the University City North/South Transportation Corridor Study (SCH#2004031011). The project description provided in the University City North/South Transportation Corridor Study is very similar in scope to the project described in the subject NOP, with a notable difference in the removal of the Genesee Avenue Widening and Regents Road Bridge projects. The Department (and U.S. Fish and Wildlife Service) previously recommended that the City process an amendment to the UPC to remove the Genesee Avenue Widening and Regents Road Bridge from the UPC transportation element. The processing of an amendment to the community plan has since been followed by a City Council resolution (R-2015-142), which included removal of the Genesee Avenue Widening and Regents Road Bridge projects from the UPC.

Based on our review of current project description compared to the project description provided in the University City North/South Transportation Corridor Study project, we believe the majority of the concerns expressed in the prior comment letters remain relevant to this NOP. Therefore, we take this opportunity to reiterate the following comments and recommendations to assist the City in avoiding, minimizing, and adequately mitigating project-related impacts to biological resources.

Project Purpose and Alternatives

1. One of the purposes of CEQA is to "prevent significant, avoidable damage to the environment by requiring changes in projects through the use of alternatives or mitigation measures when the governmental agency finds the changes to be feasible" (CEQA Guideline, §15002 (a)(3); emphasis added). Given the projects potential significant effects on the MHPA and associated sensitive species (e.g., coastal California gnatcatcher) and habitats that could be negatively affected or lost by the proposed project, the CEQA alternatives analysis for this project is extremely important. We are particularly interested in the DEIR describing "a range of reasonable alternatives to the project (particularly options to maximize open space), 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," as required by Section 15126.6(a) of the CEQA Guideline. The alternatives are to include "alternatives [that] would impede to some degree the attainment of the project objectives, or would be more costly" (§15126.6(b) of the CEQA Guidelines). "The range of feasible alternatives shall be selected and discussed in a manner to foster meaningful public participation and informed decision making" (§15126.6(f) of the CEQA Guidelines). The Department will consider the alternatives analyzed in the context of their relative impacts on biological resources on both a local and regional level.

Additionally, each alternative should be evaluated for consistency with the respective design criteria, resource management and environmental elements or goals associated with the applicable land use plan, policy, or regulation affected by this project. Specific plans to consider include the Strategic Framework Element (City of Villages), University Community Plan, and Marine Corps Air Station Miramar Integrated Natural Resources Management Plan (INRMP, 2011-2015). According to the Strategic Framework Element,

the City and region have made significant strides with respect to open space preservation, however citing that "...development of sensitive lands, where it is permitted, continues to be marred by poor design and insensitive grading techniques that have resulted in the destruction of ridgelines and other environmental impacts. Finally, open space linkages between communities and the integration of open space, scenic resources, and active recreation in neighborhoods rarely occur". We are interested in how the project alternatives would avoid or minimize the aforementioned concerns.

2. The DEIR should provide a very clear and detailed description of the purpose, goals, and objectives for the project, as this will be critical in determining the most appropriate alternative to address the specific traffic needs and reduce biological impacts to a level less than significant. We recommend that the transportation/circulation analysis include a table summarizing the positive and negative effects on traffic within the alternatives' respective areas of potential effect.
3. The DEIR must ensure and verify that the implementation of any of the alternatives would meet all the requirements and conditions of the City's MSCP SAP and Implementing Agreement (IA). The DEIR should also address biological issues that are not addressed in the MSCP SAP and IA, such as specific impacts to and mitigation for wetlands or sensitive species and habitats that are not covered by the SAP and IA. For example, the DEIR should address whether any potential take of MSCP-covered species (e.g., coastal California gnatcatcher [*Polioptila californica californica*, gnatcatcher] and the least Bell's vireo [*Vireo bellii pusillus*, vireo]) would be in conformance with the MSCP.

Impact Analysis

4. The DEIR should accurately disclose the relationship of this project to the City's MSCP and the general planning policies and design guidelines (i.e., manner consistent with Section 1.4.2 of the City's SAP) that are required to be considered and to adhere to minimizing impacts to the maximum extent practicable. Rose and San Clemente Canyons are considered a core area of the MSCP (core areas being defined in the MSCP as "generally supporting a high concentration of sensitive biological resources which, if lost, could not be replaced or mitigated elsewhere"). The direct, indirect and cumulative impact analysis should include figures of the designated preserve areas that exist within and adjacent to the project boundaries along with discussion on the current status and long-term management obligations associated with these areas and any potential impacts to these areas that may result from the proposed project.
5. The Regents Road Bridge alternative would affect an area of habitat (e.g., coastal sage scrub, wetland) restoration in Rose Canyon between the main stem of Rose Creek and the southern terminus of Regents Road. This area is within the Multiple Habitat Planning Area (MHPA) of the City's MSCP SAP. Furthermore, the City committed to preserving the restoration area in perpetuity by accepting funding in 1998 from the California Department of Parks and Recreation (DPR) Habitat Conservation Fund Program (HCFP) to conduct the restoration. The DPR's procedural guide for the HCFP (May 1997), states, "applicant will maintain and operate the property acquired, developed, rehabilitated, or restored with the funds in perpetuity..... [and] make no other use, sale, or other disposition of the property except as authorized by specific act of the Legislature." The City's October 1997 application to the DPR HCFP for funding this restoration, states, "all projects are within the protected

boundaries of Rose Canyon Open Space Park," in response to a query about whether adjacent land use is permanent and compatible or adequate buffer zones would be established. The DEIR should briefly discuss the purpose of the restoration, and identify the City's commitments to the agency(ies) that awarded the City funding. If the City committed to preserving the restoration in perpetuity, and the Regents Road Bridge alternative could not be designed to avoid (including shading and indirect impacts) the restoration area, the DEIR should explain why the Regents Road Bridge is among the alternatives being studied. Additionally, two other mitigation sites (associated with the City's Canyon Sewer Cleaning Program and Long-Term Sewer Maintenance Program) occur to the east and west of the Regents Road Bridge proposal. The DEIR should evaluate the potential effects of the project alternatives on these mitigation areas.

6. For each alternative's area of potential effect (APE), the DEIR should identify the CESA- and federal Endangered Species Act (ESA)-listed species, California Species of Special Concern, and all other sensitive species for which the habitat within the APE is suitable (species addressed should include all those which meet the CEQA definition (see CEQA Guidelines, §15380). Additionally, the DEIR should identify species observed during current (i.e., within a year of circulation of the DEIR) focused surveys conducted within the APEs. Seasonal variations in use of the project area should also be addressed. Focused species-specific surveys, conducted at the appropriate time of year and time of day when the sensitive species are active or otherwise identifiable, are required. Acceptable species-specific survey procedures should be developed in consultation with the Department and the U.S. Fish and Wildlife Service.
7. The DEIR should analyze potential habitat fragmentation within the MHPA that would result from the implementation of each alternative, and the impacts of the fragmentation on the MSCP covered and non-covered species.
8. The DEIR should thoroughly analyze the potential impacts from the implementation of each alternative on wildlife corridors/linkages and wildlife movement within each alternative's APE.
 - a. The MSCP SAP states, "If roads cross the MHPA, they should provide fully-functional wildlife movement capability." The DEIR should address this requirement for each alternative, and should describe how the current level of wildlife movement in Rose Canyon and San Clemente Canyon and under Genesee Avenue would be retained or improved. Specifically, (a) for the widening of Genesee Avenue at Rose Canyon, the DEIR should describe how any existing box culverts under Genesee Avenue would be improved for wildlife movement and, (b) the design for the Regents Road Bridge alternative should span the main stem of Rose Canyon and the finger canyon between the main stem and the southern terminus of Regents Road. The discussion of measures to improve any existing box culverts should include measures to attenuate noise from traffic.
 - b. The cumulative impacts analysis in the DEIR should comprehensively discuss the issue of wildlife movement (e.g., mountain lion [*Puma concolor*], bobcat ([*Felis rufus*], and mule deer [*Odocoileus hemionus fuliginita*]), and the potential impacts from the implementation of any of the project alternatives in conjunction with past, present, and future projects within the APE.

- c. The discussion of impacts on wildlife movement should encompass the direct impacts from loss of habitat and the installation of structures and from indirect impacts such as operational noise (e.g., noise impacts can extend at least 500-feet and up to 1,000 feet from the edge of the Regents Road bridge) and lighting. We recommend that the design for the Regents Road Bridge and the portions of the Genesee Avenue widening alternative that cross over Rose Canyon and San Clemente Canyon: (i) include minimal street lighting; (ii) include measures to prevent spill-over or glare from vehicle lights into the canyons or the night sky; and (iii) include measures to attenuate the noise from traffic.
 - d. If necessary to ascertain the potential impacts on wildlife movement and to assist in determining appropriate measures to avoid or minimize these impacts, the City should conduct a wildlife movement study. The Department would appreciate the opportunity to review the scope of work developed for any study the City plans to conduct. If no such study is done, the DEIR should demonstrate that the information used for the impact analysis is adequate.
9. In addition to the loss of sensitive habitat and the wildlife impacts associated with each alternative, the DEIR should also identify and provide a thorough analysis of the following for each alternative: (a) the sensitive habitat that would receive more or less shading than now; (b) project-related changes on drainage patterns on and downstream of the project site; the volume, velocity, and frequency of existing and post-project surface flows; polluted runoff; soil erosion and/or sedimentation in streams and water bodies; and post-project fate of runoff from the project site; (c) proximity of the extraction activities to the water table, whether dewatering would be necessary, and the potential resulting impacts on the habitat, if any, supported by the groundwater; and (d) the impacts from maintenance (at any frequency) to maintain the hydraulic capacity of the modified 100-year floodplain.
10. The biological section of the DEIR should include a matrix that summarizes and compares the potential biological impacts from the implementation of each alternative, and other pertinent information.

Mitigation for the Project-related Biological Impacts

11. Mitigation measures should emphasize avoidance and reduction of project impacts. These measures should be beyond and above the design elements and construction processes incorporated into the project alternatives to avoid or minimize impacts on biological resources. For unavoidable impacts, on-site habitat restoration or enhancement should be discussed in detail. If on-site mitigation is not feasible or would not be biologically viable and therefore not adequate to mitigate the loss of biological functions and values, off-site mitigation through habitat creation and/or acquisition and preservation in perpetuity should be addressed.
12. For proposed preservation and/or restoration of habitat, the DEIR should include measures to perpetually protect the targeted habitat values from direct and indirect negative impacts. The objective should be to offset the project-induced qualitative and quantitative losses of wildlife habitat values. Issues that should be addressed include restrictions on access, proposed land dedications, monitoring and management programs, control of illegal dumping, water pollution, increased human intrusion, and so forth.

13. While the City cannot predict the mitigation requirements that the permitting agencies (e.g., U.S. Army Corps of Engineers and Regional Water Quality Control Board) would impose for impacts to jurisdictional habitats, the DEIR should propose mitigation for those impacts that is consistent with the City's Biology Guidelines, and should thoroughly describe where and how the mitigation would occur, acknowledging that the permitting agencies' requirements may exceed these mitigation requirements. The DEIR should also address whether the proposed wetland mitigation may itself affect wetland habitat. If the proposed mitigation would cause significant biological impacts, the DEIR should analyze these impacts and propose mitigation for them (CEQA Guidelines, section 15126.4(a)(1)(D)).
14. The Department recommends that measures be taken to avoid project impacts to nesting birds. Migratory nongame native bird species are protected by international treaty under the Federal Migratory Bird Treaty Act (MBTA) of 1918 (Title 50, § 10.13, Code of Federal Regulations). Sections 3503, 3503.5, and 3513 of the California Fish and Game Code prohibit take of all birds and their active nests including raptors and other migratory nongame birds (as listed under the Federal MBTA). Proposed project activities (including, but not limited to, staging and disturbances to native and nonnative vegetation, structures, and substrates) should occur outside of the avian breeding season which generally runs from February 1- September 1 (as early as January 1 for some raptors) to avoid take of birds or their eggs. If avoidance of the avian breeding season is not feasible, the Department recommends surveys by a qualified biologist with experience in conducting breeding bird surveys to detect protected native birds occurring in suitable nesting habitat that is to be disturbed and (as access to adjacent areas allows) any other such habitat within 300 feet of the disturbance area (within 500 feet for raptors). Project personnel, including all contractors working on site, should be instructed on the sensitivity of the area. Reductions in the nest buffer distance may be appropriate depending on the avian species involved, ambient levels of human activity, screening vegetation, or possibly other factors.
15. Only non-invasive, preferably native species, should be used for all proposed landscaping (e.g., in medians or shoulders) within, adjacent to, or upstream of either Rose or San Clemente Canyons. For native species, local seed (or plantings from local seed) should be used to the extent possible.
16. Plans for restoration and revegetation should be prepared by persons with expertise in southern California ecosystems and native plant revegetation techniques. Each plan should include, at a minimum: (a) the location of the mitigation site; (b) the plant species to be used, container sizes, and seeding rates; (c) a schematic depicting the mitigation area; (d) planting schedule; (e) a description of the irrigation methodology; (f) measures to control exotic vegetation on site; (g) specific success criteria; (h) a detailed monitoring program; (i) contingency measures should the success criteria not be met; and (j) identification of the party responsible for meeting the success criteria and providing for conservation of the mitigation site in perpetuity.

Discretionary Actions

17. The City's incidental take permit for the MSCP SAP does not authorize incidental take of ESA-listed species within U.S. Army Corps of Engineers' jurisdictional wetlands. Therefore,

federal take authorization through section 7, provided there is a federal nexus, or section 10 of the Endangered Species Act of 1973, as amended (16 U.S.C. 1531 et seq) may be necessary for this project.

18. The Department has regulatory authority over activities in streams and/or lakes that will divert or obstruct the natural flow, or change the bed, channel, or bank (which may include associated riparian resources) of any river or stream, or lake or use material from a river, stream, or lake. For any such activities, the project applicant (or "entity") must provide written notification to the Department pursuant to section 1600 et seq. of the Fish and Game Code. Based on this notification and other information, the Department then determines whether a Lake and Streambed Alteration (LSA) Agreement is required. The Department's issuance of a LSA for a project that is subject to CEQA will require CEQA compliance actions by the Department as a Responsible Agency. As a Responsible Agency under CEQA, the Department may consider the lead agency's CEQA documentation for the project. To minimize additional requirements by the Department pursuant to section 1600 et seq. and/or under CEQA, the document should fully identify the potential impacts to the stream or riparian resources and provide adequate avoidance, mitigation, monitoring, and reporting commitments for issuance of an SAA.¹

We appreciate the opportunity to comment on this NOP. Questions regarding this letter and further coordination on these issues should be directed to Paul Schlitt at (858) 637-5510 or paul.schlitt@wildlife.ca.gov.

Sincerely,



Gail K. Sevens
Environmental Program Manager
South Coast Region

ec: Scott Morgan (State Clearinghouse)
David Zoutendyk, U.S. Fish and Wildlife Service, Carlsbad Office

¹ A notification package for a SAA may be obtained by accessing the Department's web site at www.wildlife.ca.gov/habcon/1600.

Austin Speed
President, Citizens for the Regents Road Bridge
4079 Governor Dr. #165
San Diego CA 92122
auspeed@gmail.com

January 1, 2016

Susan I. Morrison, AICP
Associate Planner
City of San Diego, Planning Department - Environmental
1010 2nd Avenue, MS 614C
San Diego, CA 92101
[\(619\) 533-6492](tel:6195336492)
SIMorrison@sandiego.gov

Via Email (6 pages)

Dear Ms. Morrison,

This letter contains comments from multiple members of our organization, Citizens for the Regents Road Bridge. It was compiled somewhat hastily due to a lack of cooperation from the city in spite of numerous requests to extend the comment period for the “PUBLIC NOTICE OF THE PREPARATION OF AN ENVIRONMENTAL IMPACT REPORT AND A SCOPING MEETING INTERNAL ORDER No. 12002051/11003327” which technically ends tomorrow on January 1, 2016, a legal holiday.

For the record, we object to the rushed nature of this comment process which is scheduled through the holiday period to end on New Year’s Day. We also object to what appears to be a questionable public notification process via the use of the *San Diego Daily Transcript* for publication of the notice. Although we have seen evidence that the notice went out, the *SDDT* ceased active publication in San Diego at one point last year. The organization that purchased the paper’s identity does not seem to have significant circulation of any kind in San Diego and it is truly questionable as to whether the use of this publication is a viable public notification venue. This is an issue we are continuing to review.

Here are the specific comments we have on the NOP document and the Scope of Work document included within it. We are honestly trying to provide constructive comments that will assist the city in preparing a credible EIR as part of this process. We hope you find these comments helpful.

COMMENT 1. PROJECT DEFINITION: Page 2 of the NOP’s Scope of Work document says: “This EIR analyzes the impacts related to removing the Genesee Avenue widening and Regents Road Bridge projects from the University Community Plan (UCP) Transportation Element...”. It goes on to define five additional alternatives.

The document continues to describe elements of the scope of the EIR as being focused on “the project.” This is confusing because a project, as described in current CEQA Guidelines (Key Definitions Section 15378) is an activity that is planned that would involve potential environmental impact. Key terms associated with this definition of the word “project” include government public works, contractors developing public projects, or projects that require permits, licenses, certificates, or other entitlements from the government to property developers.

Asking for an EIR contractor to assess the environmental impact of the removal of a project or multiple projects from an existing plan does not comply with the definition of a project in CEQA guidelines. There is no basis to measure the impact of the removal of a planned project other than to report on current conditions.

The primary “project” as it is referred to in the NOP’s Scope of Work document (which is described as the removal of the Regents Road Bridge and Genesee Avenue widening projects) is not a project. In addition, the first alternative described in the Scope document (which is to indefinitely postpone these two projects -- referred to as the “No Project” alternative) is not a project.

To clarify the objectives of the EIR effort, we recommend that the project alternatives to be studied be listed as the following:

- **PRIMARY:** Reporting on the environmental impact of completing both the 4 lane Regents Road Bridge and the Genesee Avenue widening projects (the current UCP Transportation Element)
- **ALTERNATIVES:** Reporting on the environmental impact of:
 1. Completing the 4 lane Regents Road Bridge project only
 2. Completing the Genesee Avenue widening project only
 3. Constructing an emergency access, transit, pedestrian, and bicycle use only bridge project (it is not clear where this “half bridge” concept originated. It does not appear to be in the UCP).
 4. Constructing an emergency access, transit, pedestrian, and bicycle use only bridge project added to the Genesee Avenue widening project

We recommend eliminating the language describing the removal of the Regents Road Bridge project and the Genesee Avenue widening project. Rationale: the removal of any project from the city plan is not a project in the sense that an environmental impact will result. The environmental impact will occur only if the projects are done. The NOP should be rewritten to reflect the CEQA definition of a project in order to clarify this Scope of Work.

Section K of the Scope of Work says: “This alternative (referring to the No Project Alternative) should compare the environmental effects of buildout under the adopted plan with those alternatives associated with the removal of the Genesee Avenue widening and Regents Road Bridge projects.” Once again, the removal of Genesee Avenue widening and the subject bridge project represent existing conditions. It is difficult to read most of this document without seeing the bias toward removing these projects from the City Plan. However, the removal of these

projects from the city's project roster should be a political decision and should not be the result of asking an EIR evaluation team to rationalize the impact of doing nothing as a having some kind of overwhelmingly positive environmental impact.

COMMENT 2. REVIEW OF PREVIOUS RELEVANT EIR STUDIES: The document does not include previous EIR reports by reference, and does not seem to bind any EIR study contractor with the responsibility or obligation to review previous EIRs or traffic studies.

One of the premises of the City Council's proposed amendment to the City Plan is that significant factors have changed since the subject was last studied. San Diego City Council Resolution 309247, dated October 14, 2014 says "the transportation thresholds were last updated based on a focused transportation study dated October 9, 1997 that does not reflect the most recent development patterns and traffic impacts."

The assertion that traffic patterns have changed significantly, as stated in the subject City Council resolution, should be included in the Scope of Work, and should be evaluated by the EIR contractor. The EIR contractor should have the benefit of availability of all previous EIRs and traffic studies.

COMMENT 3. MULTIMODAL TRANSPORTATION ASSESSMENT: The NOP's Scope of Work document does not overtly require the contractor to evaluate projects from the standpoint of potential improvements to multimodal transportation in the University City area. The terms "multimodal" or "disabled" or "complete streets" do not appear in the document.

The document does say "the EIR should also address consistency with planned alternative transportation systems and related policies, as well as potential hazards to motor vehicles, pedestrians, and bicycles." The extension of Regents Road via completion of the Regents Road Bridge and widening of north Regents Road would provide an important pedestrian and bicycle route. Its deletion would cause pedestrian and bicycle trips to be rerouted for several miles. The impacts of the current traffic conditions on pedestrian and bicycle travel should be documented and mitigation measures should be evaluated and recommended for any significant impacts.

More than assessing potential hazards, the document should address the potential for the projects under study actually improving the current deficiencies in multimodal transportation accommodations for pedestrians, bicyclists, and the disabled – specifically between North UC and South UC (south of Rose Canyon). Specific tests involving people with a range of physical capabilities should be conducted with requirements to attempt to traverse from south to north UC (and vice versa) as pedestrians, bicyclists, and people with representative disabilities.

COMMENT 4. SPECIFIC AIR QUALITY ASSESSMENTS AND TESTS: The air quality section of the EIR Scope of Work should require the contractor to address the air quality issues that specifically result from the current congested traffic conditions.

It is not obvious whether the Scope of Work document actually requires the EIR contractor to run any specific air quality tests or simply review available air quality data. Slow moving traffic during peak times of the day have a measurable impact on air quality. I recommend that the Scope of

Work explicitly require tests of the air quality during peak traffic periods accompanied with a projection of the impact on air quality if the Regents Road Bridge and/or Genesee Avenue widening is implemented. We recommend that air quality measurements be focused on the school areas in University City – U.C. High School, Standley Middle School, Curie Elementary School, Spreckels Elementary School, Doyle Elementary School, and the UCSD campus.

The deletion of the Regents Road Bridge project will cause increases in the lengths of vehicle trips due to the re-routing of trips that would otherwise occur along Regents Road. The increase in vehicle miles travelled (VMT) caused by the deletion of Regents Road should be documented, including the increase in greenhouse gases that would occur.

COMMENT 5: REGENTS ROAD BRIDGE DESIGN ASSUMPTIONS: The Regents Road Bridge is described in the NOP as being implemented with two separate one-way spans. This appears to be an undocumented assumption on somebody's part that would probably increase the footprint on the canyon floor and increase the overall visual impact of the bridge. We are unaware of any design or planning studies that resulted in any decision to build two separate one-way spans for this bridge. Cost and environmental tradeoff analysis between this concept and a single span concept would be required. We are unaware of any published rationale for the selection of this bridge design concept.

COMMENT 6: OVERALL EIR SCOPE: The Scope of the required analysis to support this EIR effort appears to be constrained within the boundaries of the UCP, but the Regents Road Bridge is not an internal University City project. The Bridge is a gateway project inimical to the flow of commerce in and out of the boundaries such that the impact of the elimination of the bridge project or the No Project alternative must take into account how it affects traffic flows in Clairemont, Kearny Mesa, Tierrasanta, Mira Mesa and La Jolla at the very least. This must also relate the consequences of diversion of traffic out of way in terms of additional Vehicle Miles Travelled (VMT) and pollution. The traffic study part of the EIR should represent significant effort toward identifying the number of vehicles that must take indirect routes to travel between key locations in north and south UC (from north UC to Standley Middle School, for example).

The EIR analysis should take into account that Regents Road is an extension of Clairemont Mesa Boulevard, a major four lane collector extending across four freeways from the eastern boundary of Tierra Santa. Its link with the Golden Triangle is a significant component in the City's off-freeway traffic grid. This is essential to maintaining viability of the freeways by keeping them as free as possible from relatively short-haul traffic, and offers a choice for mobility if a freeway is blocked.

COMMENT 7. TRAFFIC EVALUATION PARAMETERS: In evaluating the impacts of traffic on the canyon, the mitigating effects on noise should be considered including the banning of large commercial trucks, the use of sound dampening surface technology such as rubberized asphalt paving, and the design features of the bridge itself. Note should be taken of the use of bridges to provide safe nesting boxes for birds.

COMMENT 8. HEALTH AND SAFETY: Credit should be given for safety benefits including the safe crossing of the rail corridor, the in line benefits for active transportation, the facilitation

of access for emergency vehicles, the availability for more convenient public transportation, and the addition of a vital new evacuation route in the event of a natural disaster.

The impacts of the deletion of the completion of Regents Road on police and fire response times should be documented and any significant safety impacts should be documented and mitigated.

COMMENT 9. ACKNOWLEDGING AND ASSESSING REGENTS ROAD’S “PASS-THROUGH” IMPLEMENTATION: The EIR project analysis should also acknowledge and credit the design of Regents Road through University City, which emphasizes safe pass-through characterized by the absence of any residential curb cuts. Traffic impacts on adjacent streets will be due to the normal ingress and egress by existing residents. The same is true in the Golden Triangle where curb access is limited to occasional common entryways for multifamily complexes, none close to the bridge approach.

COMMENT 10. COMPREHENSIVE ANALYSIS OF GENESEE AVENUE WIDENING: Efforts to analyze the widening of Genesee, either alone or with the bridge project, should consider the cost effectiveness of this project relative to the bridge, and the impacts to the existing Rose Canyon crossing, the three adjacent schools, the Governor Drive intersection, the eminent domain issues with neighboring residential properties, the disruption to existing traffic demands during construction on Genesee, and identify benefits which are superior to those provided by the new capacity of the bridge, and the ability to build it without said disruptions to existing infrastructure.

COMMENT 11. TRANSPORTATION/CIRCULATION ISSUES: This EIR will attempt to characterize current conditions in the region as a result of existing roadway infrastructure and the planned construction projects in University City and in surrounding areas. At issue is a proposed city amendment to delete proposed roadway improvements from the current approved UCP. Projects such as the expansion of UCSD’s east campus, the planned expansions to the Costa Verde shopping center area for retail and hotel spaces, and the Scripps Hospital expansion must be appropriately evaluated

It can reasonably be expected that the removal of planned roadway improvements will result in worsening traffic conditions on nearby roadways and intersections, some of which are experiencing unacceptable levels of traffic congestion during peak periods. The direct traffic impacts as a result of this amendment to the UCP will be significant.

Due to a high level of concentration of schools that are located near Genesee Avenue and Regents Road between Governor Drive and Nobel Drive, the EIR analysis should specifically consider the effects of traffic congestion in the mid-afternoon hours when the school day ends. While typical afternoon peak traffic periods may be expected to occur between 4:00 PM and 6:00 PM, the traffic analysis conducted in this area should investigate mid-afternoon traffic conditions and the potential for traffic impacts to occur during this period. It came to our attention during some community planning group meetings that traffic counts done in support of this study may not have included the crucial time periods representing the end of the school day.

The traffic increases that are expected by planned projects in the area are likely to cause cumulative traffic impacts on nearby roadways. We note that the NOP itself did not list references that the EIR contractor would be required to be aware of and/or comply with. They may be listed in other documentation supplied to the selected EIR contractor, however, we expect that the analysis of traffic increases caused by the removal of planned roadway

improvements and any significant traffic impacts will be analyzed, at a minimum, using the City of San Diego's Traffic Impact Study Manual (July 1998 or current version) and the City's CEQA significance thresholds.

For any significant direct and cumulative increased traffic impacts as a result of the removal of planned roadway improvements, it is recommended that mitigation measures be developed, evaluated, and described in detail in the resultant EIR to include cost estimates. It is important to understand the costs that would be associated with the construction of the roadway improvements currently planned in the UCP as compared to the costs of the proposed amendment that would be associated with mitigating the traffic impacts as a result of any decision to remove currently planned roadway improvements.

Some of the alternatives listed in the NOP represent proposals to abandon plans to complete the construction of Regents Road across Rose Canyon. Regents Road is one only three existing or planned crossings of Rose Canyon in the area between I-5 and I-15 (the others being Genesee Avenue and I-805). It will be important to document the potential for significant traffic impacts on I-5, Genesee Avenue, I-805, and I-15 that would be caused by the deletion of the Regents Road Bridge from the UCP. The City of San Diego's Traffic Impact Study Manual (July 1998 or current version) and the City's CEQA significance thresholds should be used in determining the extent of the significant traffic impacts caused by the removal of the Regents Road completion project from the University Community Plan.

We sincerely hope that our comments will assist the city in completing a meaningful and useful study of the emerging environmental and traffic conditions in the UC area along with a complete evaluation of the projects that would serve to mitigate those conditions. We feel as though this issue has been studied extensively and that this effort should appropriately address the planning efforts that have been undertaken to support appropriate and constructive decisions with regard to University City's future.

Please feel free to call me if you have any questions.

Sincerely,

A handwritten signature in black ink that reads "Austin Speed". The signature is written in a cursive, flowing style.

Austin Speed
619-665-6865
President, Citizens for the Regents Road Bridge

**PALA TRIBAL HISTORIC
PRESERVATION OFFICE**

PMB 50, 35008 Pala Temecula Road
Pala, CA 92059
760-891-3510 Office | 760-742-3189 Fax



January 6, 2016

Susan Morrison
City of San Diego, Planning Dept.
1222 First Ave, MS 413
San Diego, CA 92101

Re: Midway-Pacific Highway and Old Town San Diego Community Plan Updates

Dear Mrs. Morrison:

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

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

We appreciate involvement with your initiative and look forward to working with you on future efforts. If you have questions or need additional information, please do not hesitate to contact me by telephone at 760-891-3515 or by e-mail at sgaughen@palatribe.com.

Sincerely,

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

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

**PALA TRIBAL HISTORIC
PRESERVATION OFFICE**

PMB 50, 35008 Pala Temecula Road
Pala, CA 92059
760-891-3510 Office | 760-742-3189 Fax



January 6, 2016

Rebecca Malone
City of San Diego, Planning Dept.
1222 First Ave, MS 413
San Diego, CA 92101

Re: San Ysidro Community Plan Update and El Pueblito Viejo Village Specific Plan/
310690

Dear Mrs. Malone:

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

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

We appreciate involvement with your initiative and look forward to working with you on future efforts. If you have questions or need additional information, please do not hesitate to contact me by telephone at 760-891-3515 or by e-mail at sgaughen@palatribe.com.

Sincerely,

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

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**PALA TRIBAL HISTORIC
PRESERVATION OFFICE**

PMB 50, 35008 Pala Temecula Road
Pala, CA 92059
760-891-3510 Office | 760-742-3189 Fax



January 6, 2016

Myra Herrmann
City of San Diego, Planning Dept.
1222 First Ave, MS 413
San Diego, CA 92101

Re: Sewer & Water Group Job No. 827

Dear Mrs. Herrmann:

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

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

We appreciate involvement with your initiative and look forward to working with you on future efforts. If you have questions or need additional information, please do not hesitate to contact me by telephone at 760-891-3515 or by e-mail at sgaughen@palatribe.com.

Sincerely,

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

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**PALA TRIBAL HISTORIC
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January 6, 2016

Susan Morrison
City of San Diego, Planning Dept.
1222 First Ave, MS 413
San Diego, CA 92101

Re: University Community Plan Amendment

Dear Mrs. Morrison:

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

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

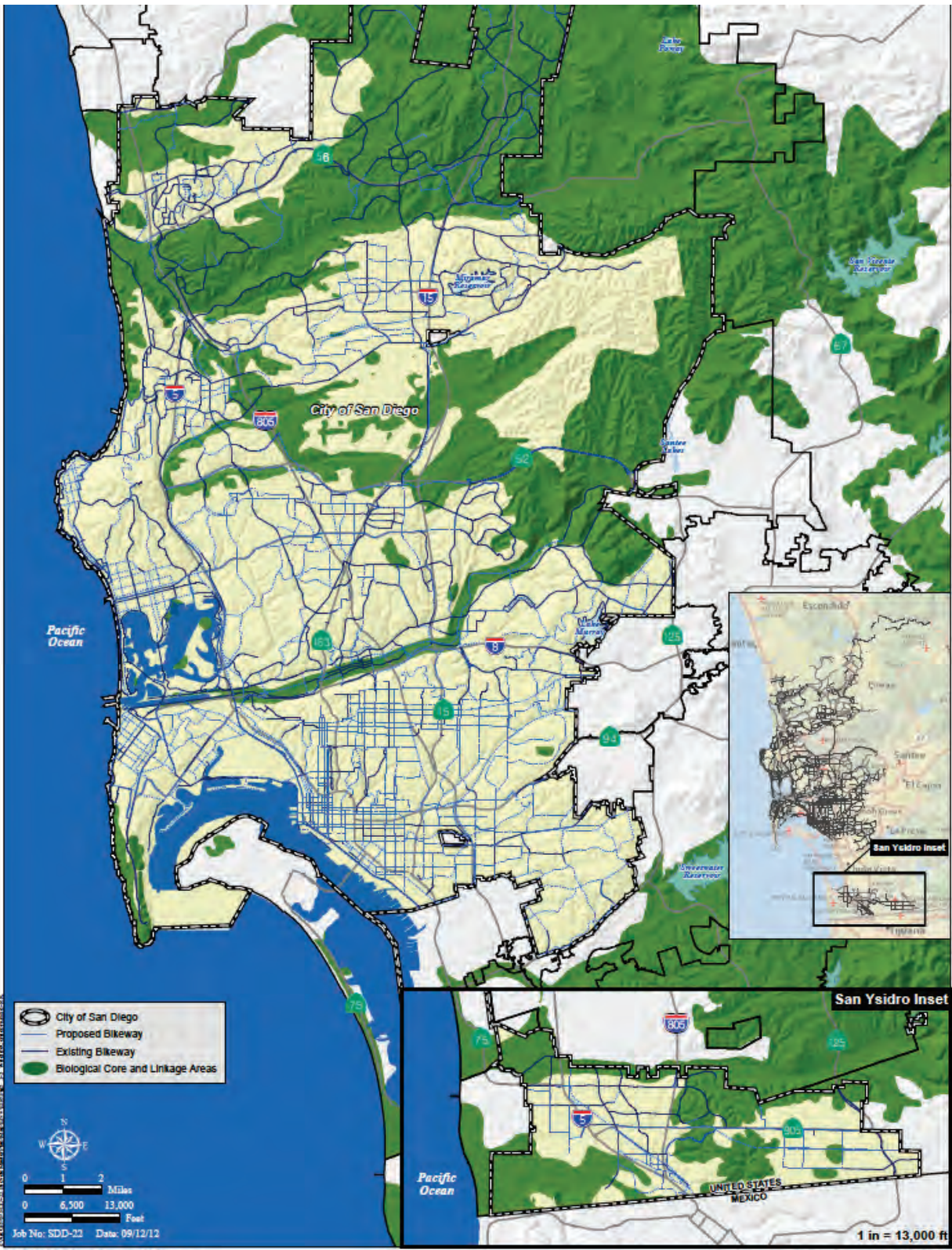
We appreciate involvement with your initiative and look forward to working with you on future efforts. If you have questions or need additional information, please do not hesitate to contact me by telephone at 760-891-3515 or by e-mail at sgaughen@palatribe.com.

Sincerely,

A handwritten signature in black ink, appearing to read "Shasta C. Gaughen". The signature is written in a cursive style with a long, sweeping underline.

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

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



Wildlife Corridors
Figure 5.1-3

Source: City of San Diego and SANDAG

**University Community Plan Amendment
Notice of Preparation - Draft Environmental Impact Report (#12002051)**

COMMENTS SUBMITTED BY CITY OF SAN DIEGO STORM WATER DIVISION
12/28/15

Since prior environmental documents may be used as a starting point in preparing this Draft Environmental Impact Report (DEIR), note the following updated information in addressing hydrology, water quality, and related storm water topics.

The most recent National Pollutant Discharge Elimination System (NPDES) Permit and waste discharge requirements for discharges from the Municipal Separate Storm Sewer Systems (MS4s) draining watersheds within the San Diego Region were adopted by the San Diego Regional Water Quality Control Board (Order No. R9-2013-0001, as amended by Order No. R9-2015-0001 and Order No. R9-2015-0100; NPDES No. CAS0109266). Copermittees subject to the permit include the County of San Diego, City of San Diego and the other 17 incorporated cities in the County, San Diego County Regional Airport Authority, and San Diego Unified Port District, and permit amendments have added Copermittees from portions of Orange County and Riverside County located within the San Diego Region. The current permit, as amended, can be accessed at:

http://www.waterboards.ca.gov/sandiego/water_issues/programs/stormwater/docs/2015-1118_AmendedOrder_R9-2013-0001_COMPLETE.pdf

The permit requires preparation of collaborative Water Quality Improvement Plans by watershed management area to guide the affected Copermittees' jurisdictional runoff management programs towards achieving improved water quality in MS4 discharges and receiving waters. The goal is to protect, preserve, enhance, and restore water quality and designated beneficial uses of waters of the state. This is to be accomplished through an adaptive planning and management process that identifies the highest priority water quality conditions within a watershed and implements strategies through the jurisdictional runoff management programs to achieve improvements in the quality of discharges from the MS4s and receiving waters. The City of San Diego was the lead in producing the Mission Bay and La Jolla Watershed Management Area Water Quality Improvement Plan (WQIP) and the Los Peñasquitos Watershed Management Area WQIP. While the University Community Plan Amendment focus is on the Regents Road Bridge and Genesee Avenue widening in the Mission Bay and La Jolla Watershed Management Area, it appears other changes could also be involved affecting the Los Peñasquitos Watershed Management Area. Thus, information is being provided for both watershed management areas. The most recent versions of these WQIPs can currently be accessed at:

http://www.waterboards.ca.gov/sandiego/water_issues/programs/stormwater/docs/REVISED_MBWMA_WQIP.pdf and

http://www.waterboards.ca.gov/sandiego/water_issues/programs/stormwater/docs/REVISED_LoSPenWMA_WQIP.pdf

Two adjacent Areas of Special Biological Significance (ASBS), now called the Scripps ASBS and the La Jolla ASBS, were created along the La Jolla area coast in 1974. The California Ocean Plan was amended in 1983 to prohibit waste discharge into an ASBS.

The Los Peñasquitos Lagoon Sediment Total Maximum Daily Load (TMDL) is the first "third party stakeholder driven" TMDL adopted in the San Diego Region. The San Diego Regional Water Quality Control Board adopted Resolution No. R9-2012-0033, an amendment incorporating the Los Peñasquitos Lagoon Sediment TMDL into the San Diego Basin Plan on June 13, 2012. This TMDL Basin Plan Amendment was approved by the State Water Resources Control Board on January 21, 2014, and by the Office of Administrative Law (OAL) on July 14, 2014. The United States Environmental Protection Agency (USEPA) approved the TMDL Basin Plan Amendment on October 30, 2014. The final public documents for the adopted TMDL can be accessed at:

http://www.waterboards.ca.gov/sandiego/water_issues/programs/tmdls/los_penasquitos_lagoon.shtml#PD

The City of San Diego Jurisdictional Runoff Management Plan (JRMP) adopted by the City Council on June 16, 2015 encompasses City-wide programs and activities designed to prevent and reduce storm water pollution within City boundaries. This plan supersedes the prior City Jurisdictional Urban Runoff Management Plan (JURMP), which is no longer in effect. The 2015 JRMP can be accessed at:

<http://www.sandiego.gov/stormwater/plansreports/jurmp.shtml>

The City Storm Water Division completed a Watershed Asset Management Plan (WAMP) in 2013. It covers each of the six watershed management areas located at least partially within the City, including the Mission Bay and La Jolla Watershed area that contains locations focused upon in this Draft EIR scope, as well as the Los Peñasquitos Watershed area encompassing the northern part of the community. Since the 2013 plan was prepared, it has continued to be refined and updated. The July 2013 Watershed Asset Management Plan is accessible at:

<http://www.sandiego.gov/stormwater/pdf/wamp2013.pdf>

Updated City Storm Water Standards are scheduled for City Council action in early February 2016. Regional MS4 Permit requirements for regulating post-construction storm water discharges on-site are addressed in: Part 1 – Best Management Practices (BMP) Design Manual for Permanent Site Design, Storm Water Treatment, and Hydromodification Management; Regional MS4 Permit and Construction General Permit requirements for regulating construction-phase storm water discharges are addressed in: Part 2 – Construction BMP Standards; and new

Regional MS4 Permit provisions to address post-construction storm water discharges through alternative means off-site are addressed in: Part 3 – Alternative Compliance Program. The Storm Water Standards Manual August 2015 draft is accessible at:

<http://www.sandiego.gov/stormwater/pdf/citysdstormwaterstandardsmanualdraft2015.pdf>

An updated City Storm Water Management and Discharge Control Ordinance adopted to comply with current MS4 Permit provisions took effect August 15, 2015. Refer to §43.0301 et seq. of the San Diego Municipal Code at:

<http://docs.sandiego.gov/municode/MuniCodeChapter04/Ch04Art03Division03.pdf>

Storm water infrastructure is sometimes addressed under the “Public Utilities” heading in community plan program EIRs. This does not appear to be the case for this EIR. If not, assure that any potential effects on storm water infrastructure, including capacity, operations and maintenance, are addressed. The information can be provided under the “Hydrology/Water Quality” heading, as long as the topic is addressed.

Incorporate Storm Water Standards Manual compliant Low Impact Development (LID) features into site design on public and private properties as required for development per the most current Municipal Separate Storm Sewer System (MS4) Permit.

Consider using permeable surfaces to repave public areas and public/private parking lots.

Consider opportunities for installing treatment control Best Management Practices (BMPs) into recreational facilities such as parks.

Installation of LID features should not conflict with street tree placement.

Any street redesign/retrofit should allow adequate clearance for street sweeping operations.



Wildlife Cooridors
Figure 5.1-3

Source: City of San Diego and SANDAG

RESOLUTION NUMBER R-_____

DATE OF FINAL PASSAGE _____

A RESOLUTION OF THE COUNCIL OF THE CITY OF SAN
DIEGO INITIATING AN AMENDMENT TO THE
UNIVERSITY COMMUNITY PLAN.

WHEREAS, the City Council may initiate a community plan amendment by resolutions pursuant to the General Plan Land Use and Community Planning Element Policy LU-D.9, which recognizes the ability of the City Council to initiate a General Plan and community plan amendment when direction is received through a vote of the City Council without demonstration of meeting the initiation criteria to prepare a plan amendment; and

WHEREAS, on September 29, 2014, the City Council held a public hearing to consider initiating an amendment to the UPC, on file in the Office of the City Clerk as Document No. RR-_____ ; and

WHEREAS, the current University Community Plan (UCP) and original Environmental Impact Report (Original EIR) No. 86-0278 was adopted and certified on July 7, 1987 (R-268789), and the UCP Transportation Element was based on the traffic studies performed in the Original EIR; and

WHEREAS, the North University City (North UC) Public Facilities Financing Plan (PFFP) was adopted on April 12, 1988 (R-270740), and the listed transportation thresholds were based on the North University City Public Facilities Phasing Plan (RR-270741); and

WHEREAS, the North UC PFFP was last updated on June 26, 2012 (R-307508), and the transportation thresholds were last updated based on a focused transportation study dated October 9, 1997 that does not reflect the most recent development patterns and traffic impacts; and results in a need to prepare a new traffic study to evaluate the need for the remaining

uncompleted transportation projects, including but not limited to Genesee Avenue Widening and Regents Road Bridge; and

WHEREAS, the majority of all planned transportation projects have been completed and the resultant traffic conditions and average daily trips (ADTs) counts are different than as anticipated in the 1997 transportation study, as measured by subsequent project-specific environmental studies; and

WHEREAS, the impacts of the Caltrans North Coast Corridor Project (providing for additional connectivity from North UC to I-5); the Mid-coast Corridor Project (providing for light rail connection between North UC and Old Town, and certain UCSD Circulation Improvements within North UC were not evaluated in the 1997 transportation study; and

WHEREAS, various development projects have been approved for the University City Community Plan area which have analyzed, pursuant to CEQA, the direct and cumulative impacts of development without the construction of Genesee Avenue Widening and the Regents Road; and

WHEREAS, the Genesee Avenue Widening and Regents Road projects (identified as CIP projects S-00852 and S-00729) are on hold due to a variety of technical, environmental, and community concerns relating to issues such as right-of-way acquisition and construction of improvements in Rose Canyon; and

WHEREAS, the Regents Road Bridge requires permits from United States Fish and Wildlife Service (USFWS), the California Department of Fish and Wildlife (CDFW) and the Regional Water Quality Control Board (RWQCB), and EIR comment letters from SFWS/CDFW strongly urged the City to remove the project from the UCP, and EIR comments from the RWQCB indicated permits would be difficult to obtain. Additionally, the City committed in 1998 to preserve the Regents Road area of Rose Canyon in perpetuity as a condition of a State

Habitat Conservation Grant, which would require an action of the State Legislature to remove;
and

WHEREAS, the Mayor, the Councilmember for the District, and the University Community Planning Group support the initiation of an amendment to the UCP to analyze and update the transportation facilities necessary to serve existing and future development in University City in accordance with the General Plan Land Use and Community Planning Mobility Element Policies; and

WHEREAS, the City Council expects that as part of any community plan amendment process that the North UC PFFP and South UC Public Facilities Summary shall be amended in accordance with General Plan Policy LU-D.2., which states that an amendment to a public facilities financing plan shall be processed concurrently with amendments to a Community plan, should the plan amendment result in a demand for public facilities that is different from the adopted Community plan and public facilities financing plan; and

WHEREAS, funding from developer contributions, specifically the University Towne Center Master Planned Development Permit No. 4103/Site Development Permit No. 293783, Condition 118, a contribution of \$500,000 toward the preparation of a mobility plan for the University Community area, has been identified for the purpose of developing the scope of work and costs for the technical and environmental analyses required to complete the CPA; NOW, THEREFORE,

BE IT RESOLVED, by the Council of the City of San Diego, that it hereby initiates an amendment to the University Community Plan.

BE IT FURTHER RESOLVED, that the following issues shall be evaluated as part of the UCP amendment process:

1. Implementation of General Plan Goals into the UCP, especially as they relate to the vision, values and City of Villages strategy and the provision of public facilities.
2. Consideration that UCP amendments could provide additional community benefit and public facilities towards achieving long term community goals.
3. Consideration of the impacts of removal of the Genesee Avenue Widening and Regents Road Bridge projects from the UCP.
4. Consideration of any additional issues identified through the amendment process.

BE IT FURTHER RESOLVED, that in accordance with General Plan Policy LU-D.11., the City Council acknowledges that the initiation of a plan amendment in no way confers adoption of the plan amendment; that neither staff nor Planning Commission is committed to recommend in favor or denial of the proposed amendment, and that the City Council is not committed to adopt or deny the proposed amendment.

APPROVED: JAN I. GOLDSMITH, City Attorney

By _____
Shannon M. Thomas
Deputy City Attorney

SMT:als
09/16/14
09/18/14 Cor.Copy
Or.Dept: Council District 1
Doc. No.: 859987_3

I hereby certify that the foregoing Resolution was passed by the Council of the City of San Diego, at this meeting of _____.

ELIZABETH S. MALAND
City Clerk

By _____
Deputy City Clerk

Approved: _____
(date)

KEVIN L. FAULCONER, Mayor

Vetoed: _____
(date)

KEVIN L. FAULCONER, Mayor

From: [Dan Wolfson](#)
To: [PLN_PlanningCEQA](#)
Cc: munnmc@earthlink.net; contactus@citizensfortheregentsroadbridge.org
Subject: UNIVERSITY COMMUNITY PLAN AMENDMENT - Schedule No.: Pending (Internal Order 12002051/11003327).
Date: Tuesday, December 08, 2015 1:57:12 PM

Ms. Morrison,

I support the construction of the long overdue and already approved Regents Road Bridge and I am fed up with seeing so many efforts to derail this project. It looks like the Planning Commission is adding to these obstructions. I object to the timing of the NOP and Scoping meeting during the busy holiday season and insist that the comment period is extended at least another 30 days beyond January 1st.

Respectfully,

Dan Wolfson
858-546-0707
DanW@USA.net



This email has been checked for viruses by Avast antivirus software.
www.avast.com

From: [Danielle Lindsay](#)
To: [PLN_PlanningCEQA](#)
Cc: [Danielle Lindsay](#)
Subject: UNIVERSITY COMMUNITY PLAN AMENDMENT
Date: Sunday, December 06, 2015 7:19:57 AM

ATTN: Susan Morrison, ENVIRONMENTAL PLANNER
CITY OF SAN DIEGO PLANNING DEPT.

Dear Ms. Morrison,

I am writing in SUPPORT for the REGENTS ROAD BRIDGE in University City. I have lived in UC since 1970 and seen the area grow tremendously. The original plan for this community includes the alternate north-south Regent Road route. Without it Genesee is the only access to evacuate this area if there is an emergency evacuation. Thinking of the fires 10 years ago that burned from the East and could have crossed over the 805 into UC, the access routes out of UC could have been terrible and ineffective.

With the development of the UTC area - businesses, housing and the growth the UCSD-the amount of traffic on Genesee Avenue has been come overwhelming and very dangerous particularly the intersection of Genesee and Governor. During the morning and evening rush hour the roads are like a parking lot which is a safety concern if there is a medical, fire or police emergency. Many accidents, fatal and non fatal, have happened at the intersection which is only a block from Standley Middle School. Some of the accidents have involved pedestrians and bicyclist. Plans to increase the size of UTC Westfield Mall, UCSD and business will only increase the overflowing of traffic situation.

As far as the environmental concern if the Regents Road is built through the canyon, since there is already the train which cuts through the canyon, I don't believe that the road will impact the canyon's environment any more than the Genesee Road and bridge. Unfortunately, 30 years ago when the development of UTC was approved there was no or little consideration on the impact of the canyon environment. Now that the development has been complete and still growing, it is too late to consider how to maintain the canyon as it would have been. I think the non supporters of the Regents Road extension are more concerned with the traffic noise and congestion that they will experience. I hope this fact is taken into consideration by the City Planning Department.

The most important consideration for the extension of Regents Road is the safety to the community by reducing the congestion on Genesee and having a alternate north-south emergency route through the community. I hope that the Planning Department considers these as the most important issues and continues with the development of Regents Road.

Danielle Lindsay
6283 Radcliffe Drive
San Diego, CA 92122

858-558-9160

From: [Friends of Rose Canyon](#)
To: [PLN_PlanningCEQA](#)
Subject: University Community Plan Amendment
Date: Monday, January 04, 2016 4:20:54 PM
Attachments: [Knight Scoping Comments UCP Amendment.pdf](#)
Importance: High

Dear Ms. Morrison,

Attached are my scoping comments, submitted on behalf of Friends of Rose Canyon. Since the 30 time comment period fell on the weekend, I am submitting these on the next business day.

I am submitting in separate emails, 20 attachments.

Thank you.

Deborah Knight
Friends of Rose Canyon
858-597-0220

Deborah Knight
Friends of Rose Canyon
Rosecanyon@san.rr.com
6804 Fisk Avenue
San Diego, CA 92122

Submitted via email (Comments and attachments submitted separately)

Scoping Comments
Project: University Community Plan Amendment
Jan. 4, 2016

Dear Ms. Morrison:

Friends of Rose Canyon strongly supports the deletion of the Regents Road bridge project from the University Community Plan. While our focus is on the Regents Road bridge project due to its many profoundly negative impacts, we are pleased that the City is proposing to remove the Genesee Avenue widening as well. While its impacts are lesser than those of the Regents Road bridge project, both of these road projects are antiquated proposals out of step with a long list of environmental regulations, commitments and goals as well as many of the City's goals for walkable, livable urban communities.

1. Project Description

The DEIR must clearly describe "The Project": i.e., the Community Plan Amendment (CPA) to remove the Regents Road bridge project and Genesee Avenue widening project from the Transportation Element of the University Community Plan (UCP). The CPA was initiated on 9/29/14 in a resolution approved unanimously by the City Council and supported by the Mayor. The DEIR should describe the purpose, goals and objectives of the project, including those related to preserving Rose Canyon.

The NOP's description of the Project is quite vague. It mentions the removal of the Regents Road Bridge/Genesee Avenue widening and each of the five project alternatives in one sentence, thereby giving the impression that all of the alternatives – including the Project itself – will be given equal weight in the EIR. Generally an NOP will clearly describe the Project and indicate the purpose of the Project. Separately, it will then identify and describe each of the Project's alternatives, including an explanation as to why each alternative was selected, e.g., to avoid or reduce the Project's environmental impacts. In this case, however, the City's current range of alternatives would actually result in greater environmental impacts than the proposed Project.

Project Objectives

Clearly a key objective of the Project in deleting the Regents Road bridge project is to preserve Rose Canyon. This objective was articulated by Mayor Faulconer and Council President Lightner at their press conference on 9/25/14, which was held at the dead end of Regents Road overlooking Rose Canyon Open Space Park to highlight this objective (see

Attachment 1: Press Release; and City News Room video of the Press Conference at Regents Road Bridge Plan). In addition, Resolution R-2015-142 initiating the CPA (**Attachment 2**) refers to the USFWS/CDFW's strong recommendation in 2005 and 2006 that the City remove the Regents Road bridge project from the UCP, and the RWQCB's 2005 and 2006 warnings that it would be difficult for the City to get permits for the Regents Road bridge project. The Resolution also cites the commitment that the City made to the State of California to preserve in perpetuity the Regents area of Rose Canyon Open Space Park when it accepted a state Habitat Conservation Fund restoration grant for that area.

A second objective of the Project, as stated by Mayor Faulconer at his press conference, is to improve emergency services with new fire stations, particularly in south UC.

A third objective of the Project, as stated in the City Council Resolution, is implementation of General Plan goals in the UCP, especially as they relate to the vision, values and City of Villages strategy and the provision of public facilities

The focus by the Mayor, Council President Lightner, and the USFWS/CDFW has been, appropriately, on removing the Regents Road bridge project from the UCP, as it would be far more environmentally damaging than the Genesee Avenue widening. However, removing the Genesee widening would also help preserve Rose Canyon, as well as meet the Project's other objectives.

Attachment 1: Mayor's Press Release, Sept. 25 2014
"Faulconer, Lightner Back Plan to Protect Canyon Park, Start Community Process to End Regents Road Bridge Controversy – City to study removing cross-canyon bridge project from community plan, review new fire stations for University City."

Attachment 2: Resolution R-2015-142 initiating the CPA

Attachment 3: Link to Video of Press Conference: [Regents Road Bridge Plan](#)

2. Environmental Setting

The Regents Road bridge project is an antiquated proposal that should be deleted from the UCP and the General Plan. The following should be discussed in the DEIR.

Rose Canyon was acquired by the City in 1979 specifically to "preserve" Rose Canyon. The November 1979 Ordinance No. 0-15073 expressly sets aside and dedicates Rose Canyon as "Rose Canyon Open Space Preserve."

The DEIR should address the history of the Regents Road bridge project and the many changes that have occurred since the 1987 UCP update. The project has always been problematic due to the topography of its location and its major negative environmental and community impacts. The EIR should address how removal of the Regents Road bridge project from the UCP fits with the changes in environmental regulations, conservation goals

and commitments, and planning goals that have occurred since 1987. These include:

- 1997 – “The Multiple Species Conservation Program (MSCP) was adopted to preserve and manage sensitive species at the ecosystem level through habitat protection.” (General Plan, p. CE-13). Much of Rose Canyon was included in the MSCP as part of the Urban Lands MHPA.
- 1997 – 2002: The City accepts a Habitat Conservation Fund (HCF) grant from CA State Parks and commits to preserve in perpetuity the Regents area of Rose Canyon (**Attachment 4** – 1997 City Council Resolution approving HCF grant; Attachment 5, Excerpt of Assurances for HCF grant). In the 2003 MSCP report to the USFWS/CDFG (and submitted to the Mayor and City Council) the City cites on p. 8 under MHPA “Management Activities” the restoration work done with the HCF grant. (**Attachment 6**)
- 2007 – 2015: the City carried out the Rose Canyon Wetland and Upland Mitigation Project in Rose Canyon located immediately to the east and west of where the Regents Road bridge project would be built. The project was required by state and federal regulatory agencies as mitigation for sewer pipeline repair projects; (**Attachment 7, p. 21 & Fig. 4**). In 2011, the City cited this project in their annual MSCP report. In 2015, the City contracted for additional watering of trees in the wetland creation areas (**Attachment 8, Fig. 2 - aerial maps of the Rose Canyon mitigation sites showing ACOE and CDFW jurisdictions**).
- The 2008 General Plan Update includes many goals and policies that support removal of the Regents Road bridge project as well as the Genesee Widening. Among these are: Open Space and Landform Preservation, Watershed Planning to Preserve and Enhance Wetlands, Walkability, Neighborhood Character, Recreation, and Environmental Education. These two road projects directly conflict with these and other aspects of the General Plan.
- 2015 - The Climate Action Plan
- 2016 - the new MS4 permit takes effect, which is far more stringent than the previous 2007 permit (the 2001 permit was in effect when the previous EIR was done on the Regents Road bridge project and the Genesee Widening project.) It is doubtful that the Regents Road bridge project could comply with the new permit.

The DEIR must include a comprehensive description of the environmental setting.

Rose Canyon contains multiple important protections, and provides multiple environmental benefits to people and wildlife, to the local community, to the Rose Creek Watershed, and to all San Diegans. The DEIR should, at a minimum, describe the following:

Rose Canyon is an Open Space Park

The City’s Park and Recreation Website describes Open Space Parks as:

“Open Space within the City of San Diego is defined as areas generally free from development or developed with low intensity uses that respect natural environmental characteristics. Open Space Parks are used for purposes such as preservation of natural resources, passive outdoor recreation and scenic and visual enjoyment.”

The DEIR should describe Rose Canyon Open Space Park and address how removing the Regents Road bridge would be in alignment with the City’s goals for Rose Canyon Open

Space Park. While the Genesee widening would have a lesser impact on the park than the , removing the Genesee Widening would also align with these goals.

The MSCP

Much of the Rose Canyon greenbelt is in the MSCP (MHPA), including almost all the area near Regents and some of the area near Genesee.

The DEIR should address the joint letters from the USFWS/CDFG that repeatedly state the Regents Road bridge project would not be in compliance with the MHPA and calling on the city to delete the Regents Road bridge project from the UCP.

Attachment 9: USFWS/CDFG letter on the UCNSTCS DEIR (2005)

Attachment 10: USFWS/CDFG letter on the UCNSTCS FEIR (2006)

The DEIR should address how removing the Regents Road bridge project would support the following MSCP management policies and directives. To a far lesser extent, removing the Genesee Avenue Widening would do so as well.

a. City of San Diego website – MSCP, 1.5.7

Specific Management Policies and Directives for Urban Habitat Lands

Goals and Objectives

“The optimum future condition for the urban habitat lands scattered throughout the City of San Diego is a system of canyons that provide habitat for native species remaining in urban areas, “stepping stones” for migrating birds and those establishing new territories, and environmental educational opportunities for urban dwellers of all ages. The system of urban habitat canyons and natural open space throughout the City provide important areas for people to enjoy and learn about the natural world and local environment. These areas also afford visual enjoyment and psychological relief from urbanization, while supporting habitat for the maintenance of both common and rare species. This habitat, surrounded by development and modified through time, presents unique opportunities for research into fragmentation, edge effects, and urban wildlife ecology.”

b. Covered Species in the Regents Road area include California Gnatcatcher

The EIR should address the protection of both the birds themselves and their habitat.

Attachment 11: Figure 4.3-7, UCNSTCS EIR – aerial showing the MHPA and the California gnatcatcher sightings in the area of the Regents Road bridge project

c. The City’s MSCP webpage lists the following as “Major Issues for the Urban Habitat Lands.”

1. Intense land uses and activities adjacent to and in covered species habitat.
2. Dumping, litter, and vandalism.
3. Itinerant living quarters.
4. Utility, facility and road repair, construction, and maintenance activities.
5. Exotic (non-native) and invasive plants and animals.

6. Urban runoff, and water quality.

The EIR should address how removing the Regents Road bridge project and the Genesee widening would reduce or prevent these problems in the Rose Canyon MHPA lands and how building these road projects would lead to an increase in these problems.

3. The DEIR should clearly identify the major impacts of the Regents Road bridge project

Note: “Landform Alteration” should be added to the list of environmental impacts evaluated in the DEIR.

In addressing any of the alternatives that include building the Regents Road bridge project, the DEIR should describe the specifics of the Regents Road bridge project. These are well documented and contribute to the project’s major impacts, including Biological Resources, Visual Effects, Landform Alteration, Neighborhood Character, Hydrology/Water Quality, and Noise.

The City already has volumes of information on the environmental impacts of the Regents Road bridge project.

The City has spent \$3.63 million dollars on environmental impact analysis of the Regents Road bridge project and the Genesee Avenue widening (see North University City 2013 FBA, p. 21 and 29 for amounts already spent).

These studies include:

- Draft Project Constraints Report - Regents Road Bridge Project prepared by Dudek & Associates, 1994.
- UC North South Transportation Corridor Study Project EIR, 2006 prepared by Project Design Consultants (the EIR studied both the Regents Road bridge and Genesee Ave. widening projects)

The information in these studies identifies numerous major negative biological, visual, noise, water quality, and other impacts of the Regents Road bridge project. Both studies also conclude that due to topography, there is no way to connect the two ends of Regents Road with a bridge. There are two existing fixed road ends, each sloping toward the canyon with a large hill in between them. The southern portion of the project will be a cut and fill road rather than a bridge.

Attachment 12: Regents Road bridge project aerial (UCNSTCS EIR)

As shown in this aerial, over 40% of the distance between the two existing road ends would NOT be a bridge, but 700’ of new cut and fill roadway requiring massive grading in Rose Canyon Open Space Park, the MHPA and the area preserved due to the HCF grant. This 2006 EIR design is almost exactly the project design in the 1994 Projects Constraint Report.

The EIR should address the fact that due to the topography of the canyon, the Regents Road Bridge project does NOT span Rose Canyon with a bridge. The Project requires

construction of a cut and fill road for 700' from Lahitte Court northward to the middle of Rose Canyon. Construction of this cut and fill road would require filling in to a depth of about 50' the canyon near the south rim, and bulldozing away much of a large hill (covered with coastal sage scrub) to construct a road to the middle of the canyon. There, the bridge portion of the project would begin (on the north side or what is left of the large hill) and extend 870' to the north side of the canyon.

The city paid different consultants to do the 1994 Environmental Constraints Report and the 2006 Project EIR, and they both came up with the same way – and the only way possible - to build the Regents Road bridge project. PDC, the consultants doing the 2006 EIR, were even required in their contract to come up with two different designs and could not do it.

The UCNSTCS Environmental Impact Report, June, 2006, p. 3-14, gives the following description of the Regents Road bridge project:

“The bridge portion of the project alternative spanning Rose Canyon would be approximately 870 feet long. However, an additional 1,690 feet along Regents Road and undeveloped land also would be affected. This additional length of impact includes existing roadway widening for transitions, and *approximately 700 feet of new road construction via cut and fill from Lahitte Court to the south edge of the bridge.*” (Italics added.)

P. 4.7-3 Regents Road Bridge – Landform Alteration (note, the EIR bizarrely refers to the large hill in the canyon that it would have to cut through as a “ridge.”)

“Significant landform alteration impacts would occur as a result of the Regents Road Bridge alternative. In addition, as discussed in Section 3.3.1.2, the Regents Road Bridge Alternative would involve cut and fill across a portion of a tributary to Rose Canyon and a ridge adjacent to the south edge of the canyon. Construction of the bridge and connecting cut-and-fill would involve approximately 88,000 cubic yards of earthwork. An estimated total of 6 acres would be affected by grading. Natural slopes exceeding 25 percent would be affected by the alternative. A 2:1 cut slope would be created in the ridge on the on the south edge of the canyon, south of the bridge span, and the cut would be up to 70' high. 2:1 fill slope would be created in a portion of a tributary to Rose Canyon The fill slope would have a maximum dept of 40 feet.”

While the City's contract with PDC required them to come up with two different designs for the bridge project, PDC failed to identify any alternative to the 700' of cut and fill roadway leading to an 870' box girder bridge.

The Draft Project Constraints Report, May 1994, concludes a very similar cut and fill road plus box girder bridge is the only way to build the Regents Road bridge project. Executive Summary:

“The new roadway and bridge through the canyon is on a straight line connecting the existing horizontal curves on each side. The vertical alignment through the canyon is almost entirely with a sag vertical curve conforming to Caltrans standards. A large fill be required as the roadway enters the canyon on the south side creating excessive cover over an existing sewer line. North of the fill a large cut is required which will encroach into private property.”

“The proposed bridge is approximately 870 feet long and spans the deepest part of the canyon at an approximate height of 60 feet. Several structure types were considered for the bridge (large arch, truss and cable-stayed) solely for aesthetic purposes. As these types of bridges were found to be not suited for this application, all three were discounted. The type of bridge best suited for this site is the concrete box girder.

P. 22 - “Extensive grading will be required for the construction of Segment 2.” [From Lahitte Court north to the beginning of the bridge.] A large fill of approximately 50’ in depth will need to be constructed at the beginning of this segment. North of the fill a cut slope of up to 70’ in height is required. A preliminary earthwork calculation indicates that the volumes of cut and fill material to be closely balanced at approximately 45,000 cubic yards.”

4. The DEIR should identify the value of Rose Canyon as a Wildlife Corridor

Rose Canyon is recognized as a wildlife corridor and an MSCP Biological Core Area by both the City of San Diego, and SANDAG. To the east, connectivity for wildlife extends under I-805 to the large area of undeveloped land on MCAS Miramar. To the west, wildlife can pass under the 52 and into San Clemente Canyon (Marian Bear Park).

Attachment 13: Map Showing Rose Canyon as a Wildlife Corridor

Since 2003, the San Diego Tracking Team has been recording wildlife data quarterly along a transect in Rose Canyon. The DEIR should include data from the San Diego Tracking Team in its analysis of the value of Rose Canyon as wildlife habitat. The SD Tracking Team data is uploaded to the CA Dept. of Fish and Wildlife BIOS database.

Attachment 14: San Diego Tracking Team Rose Canyon Transect Location

Transect #51 begins at Genesee Ave. and continues through Rose Canyon Open Space Park to west of the bottom of the Regents trail. This map shows the data points along the transect.

Attachment 15: San Diego Tracking Team data for Rose Canyon 2003-2007

The Tracking Team regularly document the presence of bobcats in Rose Canyon, a species that is far more sensitive to disturbance than coyotes.

Attachment 16: San Diego Tracking Team data for Rose Canyon 2007-2014

The Tracking Team regularly document the presence of bobcats in Rose Canyon, a species that is far more sensitive to disturbance than coyotes.

The DEIR should identify the value of Rose Canyon as connected habitat and discuss the benefit to the habitat of removing the Regents Road bridge project.

Attachment 17: “Relative Sensitivities of Mammalian Carnivores to Habitat Fragmentation.”

Kevin R. Crooks published a study of carnivore populations in urban habitat fragments in coastal San Diego in Conservation Biology, April 2002. He concluded (p. 501): “Landscape

connectivity appears to be the key to the persistence of bobcat populations in developing landscapes. They can persist in fragmented habitats, but, as my results suggest, only in those landscapes with adequate movement linkages to larger natural areas. The status of bobcat populations is therefore a valuable indicator of the degree of functional, landscape-level connectivity across much of the fragmented landscapes of coastal southern California.”

5. The DEIR should discuss the Habitat Conservation Fund Grant for “Riparian Habitat Enhancement/Restoration at Rose Canyon Open Space Park”

The actions taken by the City in relation to the HCF grant are mentioned on p. 3, above. The DEIR should also discuss communications from state agencies regarding this commitment.

Attachment 18: 2006 Letter from CA State Parks reiterating the Contract Provision the City agreed to in accepting the HCF grant to preserve the area.

Attachment 19: The RWQCB comment letter on the UCNSTCS FEIR (2006) raises the issue of the City’s commitment to the State to preserve the Regents area in perpetuity.

5. The DEIR should address Water Quality and Watershed Impacts

The DEIR should address regulatory issues related to the Regents Road bridge project and the Genesee widening. These were raised by the RWQCB in 2005 and 2006, and raised serious questions as to whether the Regents Road bridge project could receive the required permits. Since then, the regulations have become significantly more stringent.

Attachment 19: The RWQCB comment letter on the UCNSTCS FEIR (2006)

Attachment 20: RWQCB comment letter on the UCNSTCS DEIR (2005)

The EIR should address the issue of compliance with the new 2013 MS4 permit. It would likely be extremely difficult for the Regents Road bridge project to comply with the new regulations. Among other issues, all bioswales and other devices to capture road runoff would need to be located where there is road access and be regularly maintained. It could also be difficult for the Genesee Widening to comply. Both road projects will drain directly, into Rose Canyon. The Regents Road bridge project would drain into the MHPA. The DEIR should address how the Project (deleting the Regents Road bridge project and Genesee Widening) would prevent water quality impacts in Rose Creek and the Rose Creek watershed.

The Rose Creek Watershed

The EIR should address the watershed benefits of deleting the Regents Road bridge project and the Genesee Widening. Rose Creek is the major fresh water tributary of Mission Bay.

Mission Bay & La Jolla Water Quality Improvement Plan (WQIP)

The DEIR should address the ways in which the Project (deleting the two road projects) is in

line with the goals of the Mission Bay Water Quality Improvement Plan (WQIP), and how building the Regents Road bridge project in particular (and to a lesser degree the Genesee widening) would be contrary to these goals.

The WQIP is described on the City's Project Clean Water website:

“A new Water Quality Improvement Plan (WQIP) was developed for the Mission Bay Watershed Management Area in accordance with the requirements of the San Diego Regional Water Quality Control Board (Regional Board) Order No. R9-2013-0001, as amended by Order No. R9-2015-0001 (NPDES Permit #CAS0109266, Municipal Permit). The plan was developed in partnership with the City of San Diego and Caltrans, who are the Responsible Agencies in the Mission Bay Watershed Management Area.

The goal of the Mission Bay WQIP is to protect, preserve, enhance, and restore water quality of receiving water bodies. This goal will be accomplished through an adaptive planning and management process that identifies the highest and focused priority water quality conditions within the watershed and implements strategies (jurisdiction-specific and/or watershed-level) to achieve improvements in the quality of discharges from the Responsible Agencies storm drain systems.”

7. General Plan

The DEIR should address how removing the Regents Road bridge is in line with the Conservation Element and many other aspects of the General Plan, including Climate Change, Open Space and Landform Preservation, Urban Runoff Management, Recreation, Air Quality, and Environmental Education.

Some of the relevant goals and policies from the General Plan are:

Open Space and Landform Preservation Goal (CE-12)

“Goal: Preservation and long-term management of the natural landforms and open spaces that help make San Diego unique.

Open space may be defined as land or water areas that are undeveloped, generally free from development or developed with low-intensity uses that respect natural environmental characteristics and are compatible with open space use. Open space may have utility for: primarily passive park and recreation; conservation of land, water, or other natural biological resources; historic or scenic purposes; visual relief; or landform preservation. San Diego's many canyons, valleys, mesas, hillsides, beaches, and other landforms create a unique setting that fosters biodiversity, a sense of place, and recreational opportunities.”

Policies

CE-B.1. Protect and conserve the landforms, canyon lands, and open spaces that: define the City's urban form; provide public views/vistas; serve as core biological areas and wildlife linkages; are wetlands habitats; provide buffers within and between communities; or provide outdoor recreational opportunities.”

CE-C.6 Implement watershed management practices designed to reduce runoff and improve the quality of runoff discharged into coastal waters.

E. Urban Runoff Management – P. CE-26

Goals

“Protection and restoration of water bodies, including reservoirs, coastal waters, creeks, bays and wetlands.”

Discussion: “Open space areas and permeable surfaces are important to ensuring water quality.”

Policies

CE-E.2 – “Direct concentrated drainage flows away from the MHPA and open spaces.”
“Open space areas and permeable surfaces are important to ensuring water quality.”

CE.E.7 – “Manage floodplains to address their multi-purpose use, including natural drainage, habitat preservation, and open space and passive recreation, while also protecting public health and safety.” (P. CE-30)

G. Biological Diversity (P. CE-35 and following)

“**Goal:** Preservation of healthy, biologically diverse regional ecosystems and conservation of endangered, threatened, and key sensitive species and their habitats.”

Policies: particularly CE-G.1, G.2, G.3, and G.5.

H. Wetlands – P. CE-36

Goals:

- ◆ Preservation of San Diego’s rich biodiversity and heritage through the protection and restoration of wetland resources.
- ◆ Preservation of all existing wetland habitat in San Diego through a “no net loss” approach.

Policies:

CE-H.1 – Use a watershed planning approach to preserve and enhance wetlands.

CE.H.4 - Support the long-term monitoring of restoration and mitigation efforts to track and evaluate changes in wetland acreage, functions, and values.

CE.H.8 - Implement a “no net loss” approach to wetlands conservation in accordance with all city, state, and federal regulations.

N. Environmental Education

CE-N.9 Expand educational opportunities within open space lands and regional parks.

The DEIR should note that hundreds of students from UCHS, Standley Middle School, Curie Elementary, Spreckels Elementary, and Doyle Elementary as well as Boy Scouts and

Girl Scouts visit Rose Canyon each year for environmental education.

Recreation Element

Purpose – P. RE-3

“To preserve, protect, acquire, develop, operate maintain and enhance public recreation opportunities and facilities throughout the City for all users.”

Discussion: P. RE-3

“Parks can improve the quality of life by strengthening the body and assisting in maintaining physical well-being. Mental and social benefits include visual relief from urban development, passive recreational opportunities that refresh the frame of mind and provide opportunities for social interaction, and healthy activities for youth. Park and open space lands benefit the environment by providing habitat for plants and animals, and space for urban runoff to percolate into the soil, while also serving to decrease the effects of urban heat islands.”

Mobility Element - P. M-3

Introduction: “An overall goal of the Mobility Element is to further the attainment of a balanced, multi-modal transportation network that gets us where we want to go and minimizes environmental and neighborhood impacts.”

The DEIR should address how deleting the Regents Road bridge project and Genesee widening project would not just minimize but avoid major negative environmental and community impacts.

The EIR should evaluate how deleting the Regents Road bridge project would protect the walkability and community character of the area on either side of Regents Road north of Rose Canyon – and how building the Regents Road bridge project would degrade that neighborhood.

To reduce carbon emissions, the City's current focus is on building higher density, walkable, transit-oriented communities. That is exactly what the area near Regents north of Rose Canyon is. There are many families with young children, and they walk across Regents to attend Doyle Elementary and use Doyle Park and Recreation Center. A large number of UCSD students live in the area, most of whom use transit. The Superloop and the UCSD shuttles provide a high level of frequent transit. Construction of the Regents Road bridge project would add a large amount of new traffic to this neighborhood and undermine the very aspects of this neighborhood that the City says it wants to promote.

A. Walkable Communities (P. ME-6)

Goals

- ◆ A city where walking is a viable travel choice, particularly for trips of less than one-half mile.
- ◆ A safe and comfortable pedestrian environment.
- ◆ A complete, functional, and interconnected pedestrian network, that is accessible to

pedestrians of all abilities.

- ◆ Greater walkability achieved through pedestrian- friendly street, site and building design.

The DEIR should address how removing these two road projects would enhance the walkability of neighborhoods both south and north of Rose Canyon.

The Regents Road bridge project would greatly increase traffic on Regents both south and north of Rose Canyon. This large increase would pass near Spreckels Elementary and directly past Doyle Elementary and Doyle Park and Recreation Center. Widening Genesee would presumably bring an increase in traffic past UC High School and near Curie Elementary and Standley Middle School.

The neighborhood on either side of Regents on the north side of Rose Canyon fits the definition of the General Plan's Mobility Element strategy: "Residences within close proximity of parks, schools, shopping, employment and transit stops." (p. ME-7) Large numbers of children walk across Regents to attend Doyle Elementary. Many people cross Regents to use Doyle Park and Recreation Center. The area has a high number of UCSD students, most of whom use public transit. And the area has frequent, accessible public transit, including the Super Loop and the UCSD shuttles.

The DEIR should discuss the fact that the community immediately east and west of Regents Road on the north side of Rose Canyon has many of the features of a walkable community cited on p. ME-7, including:

- Compact, mixed-use neighborhoods linked by public transportation¹ (see Land Use and Community Planning Element, Section A; and ME Sections A and B).
- Residences within close proximity of parks, schools, shopping, employment, and transit stops² (see Land Use and Community Planning Element, Section A; and Recreation Element, Section D).
- A safe and accessible walking environment³ (see ME Section A).

The DEIR should discuss how the Project, by removing the Regents Road bridge project, would support and maintain this neighborhood's walkability, while building the Regents Road bridge project would degrade its walkability.

8. University Community Plan

The DEIR should describe the many ways in which removing the Regents Road bridge and preserving Rose Canyon supports the goals of the UCP

The DEIR should address the numerous instances that the UCP refers to the great value of Rose Canyon and its preservation. In the 1987 UCP, there is a great discrepancy between the value the UCP places on Rose Canyon and the proposal to build the Regents Road bridge project, which stands in stark contrast to the goals of preservation. Removing the Regents Road bridge project from the UCP would bring those aspects of the plan into harmony.

Examples of the great value the UCP places on Rose Canyon and its preservation:

Open Space and Recreation Element

P. 225 “The open space in the University planning area serves primarily three functions: the preservation of topographic or biotic resources and habitats for resident and migratory birds, the provision of outlets for active or passive recreation and the protection of public health and safety. The community possesses a varied and largely undeveloped topography, which provides the opportunity to develop an outstanding open space system.”

“Rose Canyon and San Clemente Canyon are also considered regional resources.”

P. 226 - “The steep slopes and pronounced valley floor are important scenic assets to the community and can serve to separate and define the neighborhoods to the north and south.”

P. 233 - “Future uses of Rose Canyon should consider the topography, vegetation and scenic value of the canyon. For this reason, passive recreational uses are recommended rather than active uses requiring major grading and construction.”

P. 236 explains that the UCP contains only 60% of the population-based parks required in the General Plan. It goes on to say, “This shortfall in population-based parks is mitigated by the four resource-based parks located in or adjacent to the community totaling over 2,065 acres.” (p. 225 lists the four parks: Torrey Pines State Reserve, Torrey Pines City Park and golf course, San Clemente Canyon and Rose Canyon). Thus Rose Canyon is all the more important to preserve, as it is supposed to compensate for the lack of population-based parks written into the UCP. Furthermore, that lack of population-based parks was calculated for the 1987 estimated population of 58,263. Per SANDAG 2010 data, the UCP area is already well above that. And the city has approved a number of additional large residential projects that have not yet been built (Monte Verde, and Westfield), and La Jolla Crossroads II, which is just opening.

Resource Management Element

P. 264 - Goals – A – “Preserve the community’s natural topography, particularly in the coastal zone and in major canyon systems.”

Natural Resources: “Many of the community’s biological resources are proposed for preservation in natural parks, as specifically address in the Open Space and Recreation Element.”

South University Subarea Plan

P. 131 - “Objective: Protect Rose and San Clemente canyons as natural regional resources, and preserve the open space character of the various finger canyons which traverse the subarea.”

The 1987 Community Plan states (p. 228) that the plan includes 90.6 acres of Population Based Parks (north and south of Rose Canyon). On p. 236, it states that for the estimated population of 58,263, there should be 138 acres of population based parks, leading to a shortfall of 47.4 acres of population based parks. Furthermore, since 1987, plan amendments

have increased the projected population of the area by many thousands of residents (UC Village, Monte Verde, La Jolla Crossroads, Westfield, West End, Genesee West). SANDAG lists population of our planning group area as 62,731 in 2010 - and the approved additional residential projects (most of which have not yet been built) will add thousands of additional residents.

List of 20 Attachments

Attachment 1: Mayor's Press Release – Sept. 25, 2014 Press Conference

Attachment 2: CPA Amendment Resolution, 9/29/14

Attachment 3: [Video link to Mayor's Press Conference](#) – “Regents Road Bridge Plan”

Attachment 4: 1997 City Council Resolution approving HCF grant

Attachment 5: Assurances from Procedural Guide For the Habitat Conservation Fund Program, CA State Parks, May 1997 (excerpt)

Attachment 6: City's 2003 MSCP Report citing work in HCF grant area (see Fig. 2)

Attachment 7: 2014 PUD Report Including Rose Canyon Upland and Wetland Mitigation sites - see p. 21 and Fig. 4

Attachment 8: PUD Scope of Work for Additional Habitat Restoration Maintenance for San Clemente and Rose Canyon Mitigation Projects – See Fig. 2 for aerial map of the Rose Canyon sites showing ACOE and CDFW jurisdictions

Attachment 9: USFWS/CDFG Comment letter on UCNSTCS DEIR, 2005

Attachment 10: USFWS/CDFG Comment letter on UCNSTCS FEIR, 2006

Attachment 11: Regents Rd. bridge project aerial - MHPA, Gnatcatchers – UCNSTCS EIR

Attachment 12: Regents Rd. bridge project Cut and Fill Aerial – UCNSTCS EIR

Attachment 13: Rose Canyon Wildlife Corridor Map (City/SANDAG)

Attachment 14: San Diego Tracking Team Rose Canyon Transect Location

Attachment 15 : San Diego Tracking Team Rose Canyon Data, 2003-2007

Attachment 16: San Diego Tracking Team Rose Canyon Data, 2007-2014

Friends of Rose Canyon: Scoping Comments, University Community Plan Amendment

Attachment 17: Article on bobcat sensitivity to disturbance

Attachment 18: Letter for CA State Parks re HCF commitment – 2006

Attachment 19: RWQCB UCNSTCS FEIR comment – 2006

Attachment 20: RWQCB UCNSTCS DEIR comment - 2005

From: [Friends of Rose Canyon](#)
To: [PLN_PlanningCEQA](#)
Subject: Attachments for Scoping Comments
Date: Monday, January 04, 2016 4:25:32 PM
Attachments: [1. 140925 Faulconer Lightner Back Regents Rd Bridge Solution.pdf](#)
[2. CPA Initiation 9-29-14.pdf](#)
[3. Regents Road Bridge Plan - YouTube.webarchive](#)
[4. HCF grant Council Resolution.pdf](#)
[5. HCF Grant Assurances 2 pager.pdf](#)
[6. MSCP 2003 report with grant area.pdf](#)

Dear Ms. Morrison,

Due to the 20 attachments with our scoping comments, I will be sending these in several emails.

Here are numbers 1-6 (note, #3 is a video link).

Deborah Knight
Friends of Rose Canyon
858-597-0220



**MAYOR KEVIN L. FAULCONER
CITY OF SAN DIEGO**

FOR IMMEDIATE RELEASE
Thursday, September 25, 2014

CONTACT:
Matt Awbrey [\(619\) 453-9913](tel:6194539913) or mawbrey@sandiego.gov

NEWS RELEASE

**Faulconer, Lightner Back Plan to Protect Canyon Park, Start
Community Process to End Regents Road Bridge Controversy**
*City to study removing cross-canyon bridge project from community
plan, review new fire stations for University City*

SAN DIEGO – Mayor Kevin L. Faulconer and Council President Pro Tem Sherri S. Lightner today announced their support for a community-driven solution to end the controversial plan to build a bridge through Rose Canyon.

“It’s time to move forward with a realistic plan that can be put into action and deliver real results for this community. This new plan will protect our environment, help the community get the fire protection it needs, and give us the final word on the Regents Road Bridge,” Mayor Faulconer said.

On Monday the City Council is scheduled to vote on studying the removal of the Regents Road Bridge project from the University City community plan. Doing so will provide certainty for the future of the community and help City planners focus on alternative solutions to ensure south University City is more accessible to emergency first responders. Building one or more fire stations south of Rose Canyon is one of the options that will be explored.

“Next week’s action by the City Council is the first step needed to bring University City into the 21st century,” Lightner said. **“This community will benefit from added public safety and community facilities, all while preserving the picturesque Rose Canyon Open Space**

Park and protecting South University City neighborhoods from unacceptable traffic congestion.”

The question of whether or not to build the Regents Road Bridge through the canyon that separates north and south University City has prompted considerable controversy and environmental concerns over the last two decades. The bridge proposal has been the subject of litigation, numerous City Council hearings and public debates.

The process to amend the University City community plan will include a new analysis of traffic and emergency response times.

“I fully support this approach,” Assistant San Diego Fire Chief Brian Fennessy said. **“It means we’re focusing on genuine solutions to improve emergency response times in south University City.”**

The announcement drew praise from environmental and community groups.

“I applaud Mayor Faulconer for taking action to protect our environment, parks and open space. And I thank Council President Pro Tem Lightner for championing this issue on the City Council,” said Debby Knight, Friends of Rose Canyon Executive Director. **“The bridge would seriously impact Rose Canyon Open Space Park, and removing it from the community plan will help us preserve this land for generations to come.”**

“Our community has been looking for leadership from City Hall, and we are looking forward to putting this divisive issue behind us,” University Community Planning Group Chair Janay Kruger said. **“We have many transportation projects and systems that have come online or are in the process of being built since the bridge was first added to our community plan in 1987. These include the new I-5 and Genesee interchange, the mid-coast trolley line that will connect to University Town Center, the SuperLoop bus system, and private and public shuttles. Our driving patterns have changed and now they need to be studied to bring our circulation plan and community plan up to date.”**

###

RESOLUTION NUMBER R-_____

DATE OF FINAL PASSAGE _____

A RESOLUTION OF THE COUNCIL OF THE CITY OF SAN
DIEGO INITIATING AN AMENDMENT TO THE
UNIVERSITY COMMUNITY PLAN.

WHEREAS, the City Council may initiate a community plan amendment by resolutions pursuant to the General Plan Land Use and Community Planning Element Policy LU-D.9, which recognizes the ability of the City Council to initiate a General Plan and community plan amendment when direction is received through a vote of the City Council without demonstration of meeting the initiation criteria to prepare a plan amendment; and

WHEREAS, on September 29, 2014, the City Council held a public hearing to consider initiating an amendment to the UPC, on file in the Office of the City Clerk as Document No. RR-_____ ; and

WHEREAS, the current University Community Plan (UCP) and original Environmental Impact Report (Original EIR) No. 86-0278 was adopted and certified on July 7, 1987 (R-268789), and the UCP Transportation Element was based on the traffic studies performed in the Original EIR; and

WHEREAS, the North University City (North UC) Public Facilities Financing Plan (PFFP) was adopted on April 12, 1988 (R-270740), and the listed transportation thresholds were based on the North University City Public Facilities Phasing Plan (RR-270741); and

WHEREAS, the North UC PFFP was last updated on June 26, 2012 (R-307508), and the transportation thresholds were last updated based on a focused transportation study dated October 9, 1997 that does not reflect the most recent development patterns and traffic impacts; and results in a need to prepare a new traffic study to evaluate the need for the remaining

uncompleted transportation projects, including but not limited to Genesee Avenue Widening and Regents Road Bridge; and

WHEREAS, the majority of all planned transportation projects have been completed and the resultant traffic conditions and average daily trips (ADTs) counts are different than as anticipated in the 1997 transportation study, as measured by subsequent project-specific environmental studies; and

WHEREAS, the impacts of the Caltrans North Coast Corridor Project (providing for additional connectivity from North UC to I-5); the Mid-coast Corridor Project (providing for light rail connection between North UC and Old Town, and certain UCSD Circulation Improvements within North UC were not evaluated in the 1997 transportation study; and

WHEREAS, various development projects have been approved for the University City Community Plan area which have analyzed, pursuant to CEQA, the direct and cumulative impacts of development without the construction of Genesee Avenue Widening and the Regents Road; and

WHEREAS, the Genesee Avenue Widening and Regents Road projects (identified as CIP projects S-00852 and S-00729) are on hold due to a variety of technical, environmental, and community concerns relating to issues such as right-of-way acquisition and construction of improvements in Rose Canyon; and

WHEREAS, the Regents Road Bridge requires permits from United States Fish and Wildlife Service (USFWS), the California Department of Fish and Wildlife (CDFW) and the Regional Water Quality Control Board (RWQCB), and EIR comment letters from SFWS/CDFW strongly urged the City to remove the project from the UCP, and EIR comments from the RWQCB indicated permits would be difficult to obtain. Additionally, the City committed in 1998 to preserve the Regents Road area of Rose Canyon in perpetuity as a condition of a State

Habitat Conservation Grant, which would require an action of the State Legislature to remove;
and

WHEREAS, the Mayor, the Councilmember for the District, and the University Community Planning Group support the initiation of an amendment to the UCP to analyze and update the transportation facilities necessary to serve existing and future development in University City in accordance with the General Plan Land Use and Community Planning Mobility Element Policies; and

WHEREAS, the City Council expects that as part of any community plan amendment process that the North UC PFFP and South UC Public Facilities Summary shall be amended in accordance with General Plan Policy LU-D.2., which states that an amendment to a public facilities financing plan shall be processed concurrently with amendments to a Community plan, should the plan amendment result in a demand for public facilities that is different from the adopted Community plan and public facilities financing plan; and

WHEREAS, funding from developer contributions, specifically the University Towne Center Master Planned Development Permit No. 4103/Site Development Permit No. 293783, Condition 118, a contribution of \$500,000 toward the preparation of a mobility plan for the University Community area, has been identified for the purpose of developing the scope of work and costs for the technical and environmental analyses required to complete the CPA; NOW, THEREFORE,

BE IT RESOLVED, by the Council of the City of San Diego, that it hereby initiates an amendment to the University Community Plan.

BE IT FURTHER RESOLVED, that the following issues shall be evaluated as part of the UCP amendment process:

1. Implementation of General Plan Goals into the UCP, especially as they relate to the vision, values and City of Villages strategy and the provision of public facilities.
2. Consideration that UCP amendments could provide additional community benefit and public facilities towards achieving long term community goals.
3. Consideration of the impacts of removal of the Genesee Avenue Widening and Regents Road Bridge projects from the UCP.
4. Consideration of any additional issues identified through the amendment process.

BE IT FURTHER RESOLVED, that in accordance with General Plan Policy LU-D.11., the City Council acknowledges that the initiation of a plan amendment in no way confers adoption of the plan amendment; that neither staff nor Planning Commission is committed to recommend in favor or denial of the proposed amendment, and that the City Council is not committed to adopt or deny the proposed amendment.

APPROVED: JAN I. GOLDSMITH, City Attorney

By _____
Shannon M. Thomas
Deputy City Attorney

SMT:als
09/16/14
09/18/14 Cor.Copy
Or.Dept: Council District 1
Doc. No.: 859987_3

I hereby certify that the foregoing Resolution was passed by the Council of the City of San Diego, at this meeting of _____.

ELIZABETH S. MALAND
City Clerk

By _____
Deputy City Clerk

Approved: _____
(date)

KEVIN L. FAULCONER, Mayor

Vetoed: _____
(date)

KEVIN L. FAULCONER, Mayor

RESOLUTION NUMBER R- 289266

ADOPTED ON OCT 07 1997

A RESOLUTION OF THE COUNCIL OF THE CITY OF SAN DIEGO AUTHORIZING THE CITY MANAGER TO APPLY FOR, ACCEPT AND EXPEND A CALIFORNIA DEPARTMENT OF PARKS AND RECREATION HABITAT CONSERVATION FUND GRANT FOR RIPARIAN AND ENHANCEMENT PROJECTS AT MARIAN R. BEAR MEMORIAL PARK AND ROSE CANYON OPEN SPACE PARK.

WHEREAS, the Habitat Conservation Fund Program ("HCF") was created pursuant to the California Wildlife Protection Act of 1990, to provide grants to local public agencies, with a preference to project sites where rare and endangered species are present; and

WHEREAS, the Park and Recreation Department staff have identified two projects that qualify for the HCF grant, one in Marian R. Bear Memorial Park and one in Rose Canyon Open Space Park, both involving the removal of non-native plant materials and replacement with native species; NOW, THEREFORE,

BE IT RESOLVED, by the Council of The City of San Diego, as follows:

1. That the Council hereby approves the filing of an application for a grant from the California Department of Parks and Recreation's Habitat Conservation Fund for riparian and enhancement projects at Marian R. Bear Memorial Park and Rose Canyon Open Space Park.

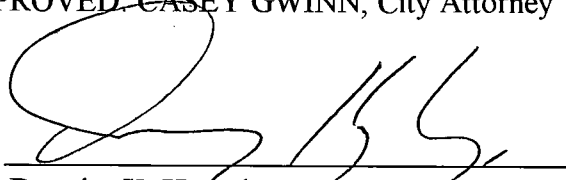
2. That the Council hereby authorizes the City Manager, or representative, to negotiate and execute all agreements necessary to comply with grant requirements, including, but not limited to negotiating and signing agreements, amendments, and payment requests.

3. That the Council hereby authorizes the City Manager, or representative, to accept and expend grant funds from the California Department of Parks and Recreation's Habitat Conservation Fund for the Marian R. Bear Memorial Park and Rose Canyon Open Space Park projects.

4. That the Council hereby authorizes the City Auditor and Comptroller to establish a separate interest bearing fund for each grant received.

APPROVED: CASEY GWINN, City Attorney

By



Douglas K. Humphreys
Deputy City Attorney

DKH:lc

9/23/97

Or. Dept. Pk. & Rec.

Aud. Cert: N/A

R-98-365

Form=r&t.res

**PROCEDURAL GUIDE
FOR THE
HABITAT CONSERVATION
FUND PROGRAM**



CALIFORNIA STATE PARKS®

*CALIFORNIA DEPARTMENT OF PARKS AND RECREATION
LOCAL AGENCY PROGRAM
under the
CALIFORNIA WILDLIFE PROTECTION
ACT OF 1990
(Proposition 117 Initiative)*

May 1997

**State of California - Resources Agency
Department of Parks and Recreation
Planning and Local Services Section**

**Post Office Box 942896
1416 Ninth Street
Sacramento, California 94296-0001**

**Telephone: (916) 653-7423
FAX: (916) 653-6511**

IMPORTANT

Before you incur costs against the grant, the funds must be appropriated by the Legislature. All requirements must be met and an agreement signed before any funds will be disbursed.

An audit may be performed before or after final payment.

An Application for grant funds consists of one copy each of the following:

1. Application Form
2. Authorizing Resolution from governing body.
3. Environmental Impact Report or Negative Declaration along with a response from the State Clearinghouse; and a copy of the Notice of Determination filed with, and stamped by, the County Clerk; and documentation that the Department of Fish and Game CEQA fee was paid or is not applicable; or a copy of the Notice of Exemption on file with the County Clerk if the project is categorically exempt.
4. Project location map (city or county) with enough detail to allow a person unfamiliar with the area to locate the project.
5. Evidence of adequate land tenure (lease, joint powers agreement, etc.) for development projects.
6. Acquisition map showing exterior boundaries and parcel numbers.
7. Site plan showing location of specific facilities to be developed (development projects).
8. Acquisition Schedule showing each parcel to be acquired (acquisition projects).
9. Cost Estimate (development projects).
10. Indication of amount, type and source of funds above grant provided by applicant.
11. Permit or comments from the following if applicable:
 - a. State Lands Commission
 - b. San Francisco Bay Conservation and Development Commission (BCDC)
 - c. Coastal Commission
 - d. Corps of Engineers
12. All leases, agreements, etc., affecting project lands or the operation and maintenance thereof.
13. Completed project proposal.
14. Photos of project site.

ASSURANCES

Applicant possesses legal authority to apply for the grant, and to finance, acquire, and construct the proposed project; that a resolution, motion or similar action has been duly adopted or passes as an official act of the applicant's governing body authorizing the filing of the application, including all understandings and assurances contained therein, and directing and authorizing the person identified as the official representative of the applicant to act in connection with the application and to provide such additional information as may be required.

Applicant will maintain and operate the property acquired, developed, rehabilitated, or restored with the funds in perpetuity. With the approval of the granting agency, the applicant or its successors in interest in the property may transfer the responsibility to maintain and operate the property in accordance with Section 5919 of the Public Resources Code.

Applicant will use the property only for the purposes of the California Wildlife Protection Act of 1990 and to make no other use, sale, or other disposition of the property except as authorized by specific act of the Legislature.

Applicant will give the State's authorized representative access to and the right to examine all records, books, papers, or documents related to the grant.

Applicant will cause work on the project to be commenced within a reasonable time after receipt of notification for the State that funds have been approved and that the project will be prosecuted to completion with reasonable diligence.

Applicant will comply where applicable with provisions of the California Environmental Quality Act and the California Relocation Assistance Act, any other state, and/or local laws, and/or regulations.

DPR 879 (Back)

**CITY OF SAN DIEGO
M E M O R A N D U M**

DATE: July 23, 2003

TO: Honorable Mayor and City Council

FROM: P. Lamont Ewell, Assistant City Manager

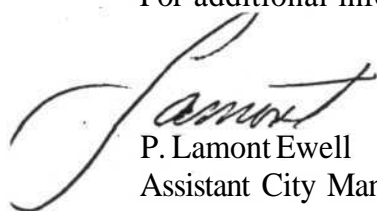
SUBJECT: 2002 MSCP Annual Public Workshop - Summary Report

The attached Summary Report on the Multiple Species Conservation Program (MSCP) is provided for your information.

Section 14.2 of the MSCP Implementing Agreement requires the City to prepare and submit to the U.S. Fish and Wildlife Service and the California Department of Fish and Game, a public report containing an annual account of the habitat lost and conserved within the City's MSCP Subarea during the previous year. The Cities of San Diego, Chula Vista and Poway, the County of San Diego, and wildlife agencies are also required to jointly conduct a public workshop to disseminate and discuss the annual report.

On August 7, 2003 the MSCP Annual Public Workshop will be held at the Lakeside Community Center, 9841 Vine Street, Lakeside, from 6:00 p.m. to 9:00 p.m. Staff from the Cities of San Diego, Chula Vista and Poway, the County of San Diego, and the wildlife agencies will conduct PowerPoint presentations on MSCP implementation activities for their respective agencies. There will be a question and answer period immediately following staff presentations.

For additional information please contact Keith Greer at (619) 236-7258.



P. Lamont Ewell
Assistant City Manager

PLE:KAG:ja

Attachment

cc: Michael Uberuaga, City Manager
S. Gail Goldberg, Planning Director
Ellen Oppenheim, Park and Recreation Department Director
Ann Hix, Open Space Division Deputy Director
Keith Greer, Deputy Director, Planning Department
Tom Story, Senior Policy Advisor to Mayor Dick Murphy
Planning Commissioners

2003 MSCP Annual Public Workshop - Summary Report

BACKGROUND:

On March 18, 1997, the San Diego City Council unanimously adopted the Multiple Species Conservation Program (MSCP). The U.S. Fish and Wildlife Service (FWS) and the California Department of Fish and Game (CDFG), collectively referred to as the wildlife agencies, entered into an Implementing Agreement (I.A.) with the City in July 1997. The I.A. requires the City to prepare a report containing an annual account of the habitat acreage lost and conserved within the City's MSCP Subarea. In addition, the City and the wildlife agencies are required to jointly conduct a public workshop to disseminate and discuss the annual report.

The City's sixth MSCP Annual Report was submitted to the wildlife agencies on February 19, 2003. The report identifies, by project, the habitat loss and conservation from January 1, 2002 through the end of the 2002 calendar year.

In 2002, habitat conservation efforts within the City's MSCP preserve area, referred to as the Multi-Habitat Planning Area (MHPA), were focused on acquiring critical areas of sensitive habitat and securing wildlife corridors within the MHPA, as well as initiating monitoring efforts. Acquisitions have been accomplished through public purchase and by directing private mitigation to parcels within the MHPA. The City and wildlife agencies have also acquired habitat within the MHPA with state and federal funding. The City is continuing to increase its efforts for the restoration, monitoring and management of habitat within the MHPA as described below.

ANNUAL REPORT SUMMARY:

Within the reporting period (January 1, 2002 - December 31, 2002), 407.1 acres of habitat were conserved in the MHPA and 103.2 acres were conserved adjacent to the MHPA, compared to the loss of 65.4 acres of habitat inside the MHPA. Outside the MHPA, 463.1 acres of habitat loss occurred (88 percent of the total habitat lost). Habitat loss represents the acreage impacted by projects approved for construction within the reporting period.

As of the end of the 2002 reporting period (December 31, 2002), a total of 32,659.7 acres have been conserved in (31,443.5 acres) or adjacent to (1216.2 acres) the MHPA. This includes pre-MSCP (baseline) conserved lands totaling 22,141 acres.

The habitat loss and conservation for the 2002 annual reporting period is summarized as follows:

TABLE 1 - 2002 HABITAT LOSS AND CONSERVATION
(January 1, 2002 - December 31, 2002)

Habitat Type & Examples of Habitats	Habitat Loss (acres)		Habitat Conserved (acres)	
	2002	Cumulative	2002	Cumulative
Wetlands: Coastal Wetlands(Salt Pan/Salt Marsh) Riparian Habitats Freshwater Marsh Natural Flood Channel Disturbed Wetland Vernal Pools Marine Habitats(Pacific Ocean/Deep Bay) Eelgrass Beds (Shallow Bays) Open Water	0.3	47.5	6.5	4845.7
TIER I (rare uplands): Southern Fore dunes Torrey Pines Forest Southern Coastal Bluff Scrub Maritime Succulent Scrub Southern Maritime Chaparral Native Grassland Oak Woodlands	58	310.5	99.9	2061.2
TIER II (uncommon uplands): Coastal Sage Scrub CSS/Chaparral	63.5	944.2	112.5	11520.5
TIER III A (common uplands): Mixed Chaparral Chamise Chaparral	124.9	499.7	218.3	6988.4
TIER III B (common uplands): Nonnative Grasslands	114.6	2319.8	24.3	3211.9
TIER IV (other uplands) Disturbed Agriculture Eucalyptus	127.4	1223.4	33.7	3062.2
Others: Beach Urban/Developed	39.8	816.5	15.1	969.7
Total	528.5	6161.5	510.3	32659.7

Note: Includes land inside and outside of MHPA.

The acreages in the table were generated by a geographic information system, which tracks habitat loss and gain. This system, Habitrak, uses the regional GIS (SANGIS) land base in its area calculations. This is the fourth year that the Habitrak system has been used to compile the habitat loss/gain information and maps for the annual report. Habitrak was developed to facilitate and standardize the annual reports for each jurisdiction that participates in the MSCP. Funding for the software development was provided by a grant from the California Department of Fish and Game and was administered by SANDAG.

PUBLIC LAND ACQUISITIONS:

In April 2000, the City Council Rules Committee approved the City priorities for MSCP land acquisition projects. Four areas totaling 4,181 acres were identified:

- Montana Mirador
- Del Mar Mesa
- East Elliott
- Otay Mesa

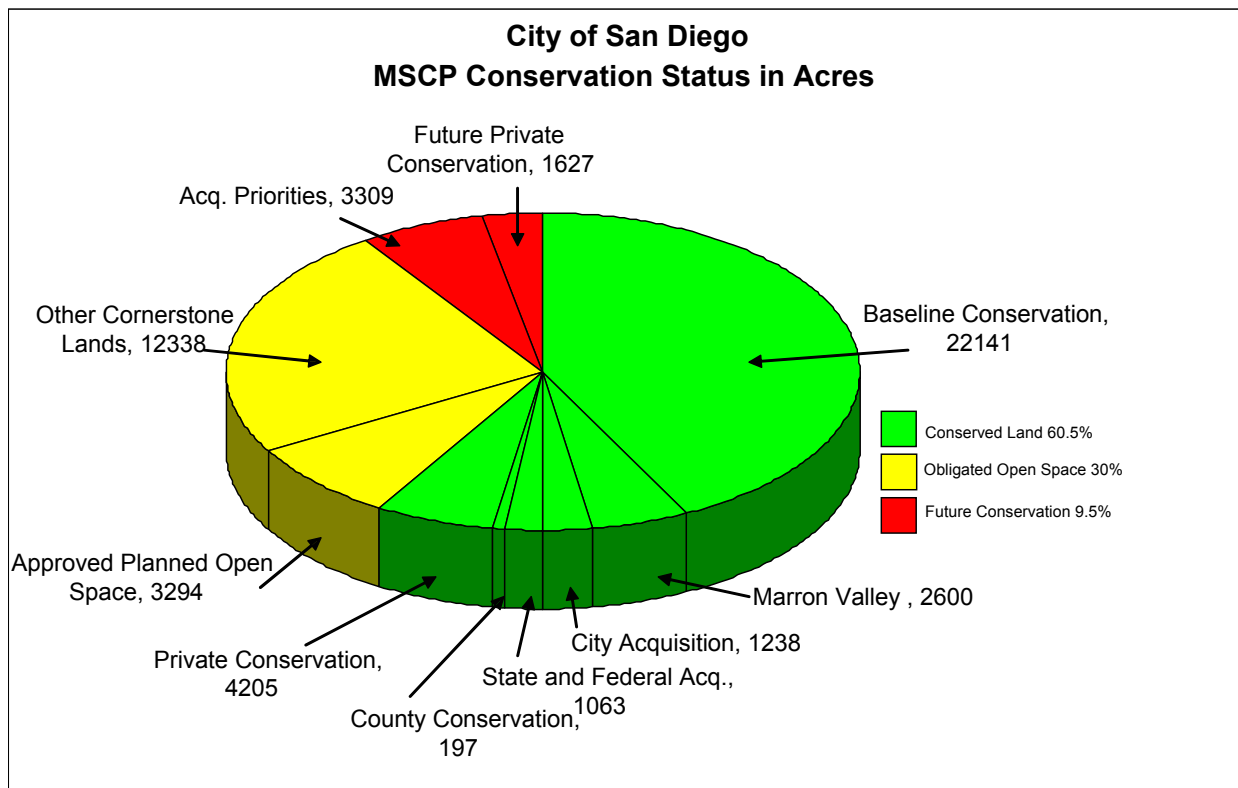
The San Diego River was added as an additional priority acquisition area in the winter of 2001.

In April 2001, the City completed the acquisition of the 538-acre Montana Mirador parcel located within the Rancho Peñasquitos community planning area. In September 2002, the City of San Diego, in partnership with the state Wildlife Conservation Board, the California Transportation Commission and the U.S. Fish and Wildlife Service, acquired three parcels totaling 56 acres located within the Del Mar Mesa area. This four-way joint acquisition provides for additional protection of scrub oak chaparral and vernal pools. In February 2003, the City acquired four additional parcels totaling 13.1 acres. Three private properties are proposing land exchanges on mitigation banks. The four remaining private property owners within the Del Mar Mesa acquisition area have rejected any offer of purchase.

In February 2003, the State Wildlife Conservation Board awarded the City a \$5 million grant for acquisition of private property in the East Elliott acquisition area. To date, 80 parcels have been appraised. Twenty offers have been made; 2 parcels (27 acres) have been acquired. Four parcels are in escrow and those remaining have not responded or have rejected the offer. Additional offers are on-going.

In addition to acquisitions made by the City, 210 acres have been conserved by Allied Landfill (115.35) and the Poway Unified School District (94.75) as mitigation. Finally, 266 acres of Fortuna Mountain were granted to the City by San Diego State University helping to conserve additional land in Mission Trails Regional Park.

On September 6, 2002, Governor Davis signed into law AB 2156 (Kehoe) creating the San Diego River Conservancy. The Conservancy will implement a vision for the river starting at the headwaters near the town of Julian, west 52 miles through Mission Valley into the Pacific at Ocean Beach. The Governor allocated \$12 million for conservation and preservation along the river.



Acquisitions on East Elliott, Otay Mesa and the San Diego River are expected to continue through this next year due to state and federal grants.

PROJECT REVIEWS:

In 2002, 161 new development projects were reviewed by the MSCP staff for consistency with the adopted MSCP Subarea Plan and implementing regulations. Since January 2003, an additional 77 new development projects have been reviewed. City staff continues to ensure that the MHPA preserve design, land use adjacency guidelines, mitigation requirements and specific area management directives have been evaluated and, as appropriate, incorporated into project designs. Projects that comply with the policies of the MSCP are afforded “Third Party Beneficiary” status as provided for in the City’s MSCP Implementing Agreement (Section 17.1).

Adjustments to the boundary of the MHPA are allowed on a project-by-project basis if the boundary adjustment is deemed functionally equivalent to the land that is proposed to be removed from the MHPA (see Section 5.4.2 MSCP Plan, August 1998). The wildlife agencies must concur with the adjustment. This year, MSCP staff has continued to have bimonthly meetings with wildlife agency staff to discuss proposed MHPA boundary line adjustments and to obtain concurrence from the wildlife agencies during the preparation of the environmental documents for the boundary line adjustment. After each meeting, MSCP staff confirm in writing the determinations made by wildlife agency staff.

GRANTS:

Grant funding is a key component to the successful implementation of the MSCP Subarea Plan. Below is a summary of current grant projects. In 2002 and 2003, the City of San Diego has secured \$5,400,332 in grant funding for acquisition, management and monitoring of lands within the MSCP.

Table 2 - 2002/2003 GRANTS

GRANT TYPE	GRANTOR	2002	2003
Natural Communities Conservation Planning (NCCP)	California Department of Fish and Game	Awarded two grants for MSCP management activities.	
Section 6 Planning Grant	U.S. Fish and Wildlife Service	Awarded grants for development of a vernal pool management plan within the City of San Diego and for functional assessments and wetland delineations in the Otay River Valley and Los Penasquitos watersheds.	
Wildlife Conservation Board (Proposition 12, 2000)	State of California Wildlife Conservation Board	Awarded \$5 million grant to acquire land in East Elliott.	
Environmental Conservation Foundation Grant	Environmental Conservation Foundation		Awarded grant for completion of the Carmel Mountain and Del Mar Mesa Preserve Management Plan.
Total:		\$ 5,308,283	\$92,049

MANAGEMENT ACTIVITIES:

In accordance with the City’s Implementing Agreement (I.A.), Section 10.6B, the City was obligated to prepare a Framework Management Plan within six months after the adoption of the MSCP Subarea Plan. The City’s MSCP Subarea Plan was adopted by the City Council in March 1997. A Framework Management Plan was included as Section 1.5 of the Subarea Plan; therefore, the City has fulfilled their obligations pursuant to Section 10.6B of the I.A.

As part of the fiscal year 2003 budget, the City Council established a new Open Space Division in Park and Recreation. This newly formed division has taken on the task of managing the

City's existing open space system, including lands acquired under the Multiple Species Conservation Program. Park and Recreation has hired a Senior Planner to serve as the Urban Canyon Coordinator. This position is a liaison between the Open Space Division and the various departments working in the canyons on water and sewer projects.

Until a regional funding source is in place, management for biological resources has been focused on maintaining the existing biological values of the habitat land under City control. Opportunities for specific biological management activities have been pursued when local or grant funding could be obtained.

The following (Area-Specific) Management Plans are completed or underway:

Table 3

AREA SPECIFIC MANAGEMENT PLANS

LOCATION	ACTIVITY	STATUS
Mission Trails Regional Park	San Diego Ambrosia Plan: Funded by a NCCP grant, this project identifies the distribution and management recommendations for San Diego Ambrosia within Mission Trails Regional Park.	The Final Plan was adopted by the Mission Trails Taskforce on May 15, 2000.
Pacific Highlands Ranch	City Council approved preparation of a 2,400 acre management plan in July 1999.	Master Revegetation Plan for the entire Pacific Highlands Ranch Subarea was completed in October 2000.
Rancho Encantada, a 1,500 acre parcel located adjacent to Sycamore County Park	Under the direction of the City, McMillian Development Company prepared a management plan for this property.	The development project plans, including final habitat management plan, obtained Council approval in 2001.
Marron Valley Management Plan	City of San Diego Water Department provided \$87,186 to prepare a management plan for the 2,600 acre Marron Valley Cornerstone Mitigation Bank.	The management plan was completed in June 2001.
San Pasqual/Lake Hodges Cornerstone	Funded by an NCCP grant, the City of San Diego Planning and Water Departments developed a management plan for the San Pasqual and Lake Hodges Cornerstone banks which includes vegetation mapping, rare plant surveys, wildlife habitat assessments, and evaluations of recreation potential and enhancement opportunities.	Biological surveys began in Spring 2002. The management plan was completed in July 2003.
Western Otay River Valley Management Plan	Funded by a NCCP grant and a \$68,490 match from the City of San Diego, Park and Recreation is preparing a	The final draft management plan was completed in April 2001. Currently under review by wildlife agencies

	management plan for the Otay River Valley between 1-5 to Heritage Road.	and subject to City Council approval. Estimated completion in 2003.
Carmel Mountain and Del Mar Mesa	The City and the USFWS Refuges Division is preparing an interagency management plan for Carmel Mountain and Del Mar Mesa. The project is funded by an NCCP and Environmental Conservation Foundation (ECF) grant, a USFWS Challenge Grant and a City match of \$27,134.	A draft was completed in March 2002. Currently, the document is being revised based on comments from the wildlife agencies and the public. Estimated completion in 2004.
Black Mountain	Funded by an NCCP grant, the City of San Diego Planning Department retained a consultant to complete sensitive plant species surveys on Black Mountain, including the recently acquired Montana Mirador.	A draft management plan was completed in June 2002. Currently comments from the wildlife agencies are being incorporated into the document. This plan is subject to City Council approval. Estimated completion in 2004.
Boden Canyon	Funded by a grant awarded to the City of San Diego, the San Dieguito JPA is preparing a joint management plan for publicly owned lands in Boden Canyon.	The final draft management plan was completed in September 2001. Currently wildlife agencies are working on completing the plan. This plan is subject to City Council approval. Estimated completion in 2004.
San Diego River (West of Mission Trails)	Funded by an NCCP grant, the City of San Diego Park and Recreation is currently working with a variety of different agencies to develop a comprehensive management plan for the San Diego River.	Surveys for exotics and an exotic removal plan was developed for the San Diego River funded by the Metropolitan Wastewater Department. Additional surveys will be conducted prior to development of the management plan. Estimated completion in 2005.

The following Management Activities are completed or underway:

Table 4

MANAGEMENT ACTIVITIES COMPLETED OR UNDERWAY

LOCATION	ACTIVITY	STATUS
San Pasqual River Valley CSS Restoration	Funded by an NCCP grant, the City is restoring 15 acres of existing agricultural fields in the San Pasqual River Valley to coastal sage scrub (CSS). The restored habitat will provide connectivity between the San Pasqual River Valley and existing uplands containing gnatcatcher and other sensitive species	The site was cleared and "imprinted" with seed from coastal sage scrub species in January 2000. Maintenance and monitoring will continue through 2003 as funding becomes available.
Lopez Canyon	Working with the Friends of Los Peñasquitos Canyon (Friends) and the California Native Plant Society, the City	Permits have been obtained for this project and construction of erosion protection measures to prevent

	has secured a grant from the U.S. Fish and Wildlife Service and the State of California to restore the hydrology of Lopez Canyon for the protection and re-establishment of willowy monardella (<i>Monardella linoides ssp. viminea</i>)	undercutting of the alluvial benches on which the willowy monardella occurs will begin in August 2003. Collected seed and other source material will be used to establish new populations.
Carmel Valley –CVREP	The City has secured a grant from the State of California to remove exotic plant species from the Carmel Valley Restoration and Enhancement Project (CVREP).	Exotic plant removal was conducted in 2001 and 2002. Maintenance continued until 2003 and many exotics have been successfully eradicated.
San Pasqual/Lake Hodges	The County Agricultural Department has secured funding from the State under a Weed Management Area program to remove exotic perennial peppergrass from the San Pasqual/Lake Hodges area.	Peppergrass removal began in Spring 2001. Maintenance and monitoring will continue as long as peppergrass still needs to be controlled and funding can be obtained.
Los Penasquitos Canyon Preserve	The City has secured grants from Caltrans, USFWS, and HCF for San Diego ambrosia restoration and riparian enhancement in Penasquitos Canyon. The City also obtained an NCCP grant to conduct weeding around San Diego thorn mint populations within Penasquitos.	Ambrosia restoration began in 1996 and a final report was submitted at the end of 2001. The riparian enhancement efforts began in 1996 and 1999 and were completed in 2000. Weeding around the San Diego thorn mint was conducted in 2002 and will continue in 2003.
Sabre Springs	The City obtained an NCCP grant to conduct weeding around San Diego thorn mint populations within Sabre Springs open space.	Weeding around the San Diego thorn mint was conducted in 2002 and will continue in 2003.
Crest Canyon	The City is conducting exotic plant removal pilot project within the canyon. The effort includes covering iceplant with tarp in order to kill the species without damaging the sensitive soils on-site.	Plant removal and eradication began in August 2002 and demonstrated great success. Additional exotic removal and restoration will occur as funding becomes available.
Tecolote Canyon	The City obtained a HCF grant for riparian restoration in Tecolote Canyon. The effort included removal of exotics and replanting of native habitat.	The riparian restoration began in 1994 and was completed in June 2001. The restoration site is being maintained as needed by Park and Recreation staff.
Rose Canyon Open Space	The City obtained a HCF grant for riparian, chamise, and CSS restoration in Rose Canyon. The effort included removal of exotics and replanting of native habitat.	The restoration effort began in 1997 was completed in 2002. The restoration site is being maintained as needed by Park and Recreation staff.
Marian Bear Memorial Park	The City obtained a HCF grant for riparian, chamise, and CSS restoration in Marian Bear Memorial Park. The effort included removal of exotics and replanting of native habitat.	The restoration effort began in 1997 and was completed in January 2003.
Mission Trails Regional Park	The City conducted multiple volunteer trail closures in 2000/2001 along riparian, grassland, and CSS habitat areas. The City conducted exotic removal of water	Maintenance of volunteer trail closures is ongoing. The exotic removal effort park-wide is ongoing. Weeding around the San Diego thorn mint was

	primrose and hyacinth in Kumeyaay Lakes beginning in 2000. The City also obtained an NCCP grant to conduct weeding around San Diego thorn mint populations within Mission Trails. Park Ranger staff continue to control exotics including fennel, arrundo, artichoke thistle and lepidium park-wide. Park Ranger and volunteer staff conducted variegated dudleya mapping.	conducted in 2002 and continued in Spring of 2003. Variegated dudleya mapping is ongoing.
Otay Valley Regional Park	The City and is conducting exotic removal under various grants. An exotic plant removal plan is also in process. 500 trees have been planted and 2000 tons of trash has been removed.	The exotic removal effort is ongoing. The exotic removal plan will identify tamarisk and arundo targeted for removal within the Park.
San Diego River	The Invasive Exotic Weed Eradication Master Plan proposes to replace all exotic weed species infestations with native wetland species along the entire river within the City of San Diego limits. Two pilot projects of about 5 acres have been implemented. The San Diego River Natural Resource Management Plan (NRMP) is starting to be prepared for the area from west end of Mission Trails Regional Park to I-5. Funds provided by NCCP grant.	Pilot Projects completed April 2003. Consultant hired to start NRMP.
Famosa Slough	A wetland/upland restoration of about 1.3 acres, including stormdrain runoff control, is underway in Famosa Slough.	Estimated to be complete in 2004.
Chaparral Canyon	A wetland/upland restoration of about 3.8 acres is in progress in Chaparral Canyon.	Estimated to be complete in 2004.
Adobe Falls	A wetland/upland restoration of about 3.5 acres is underway in Adobe Falls.	Estimated to be complete in 2004.
Black Mountain Open Space	The City obtained a HCF grant in 2000 for rehabilitation of the 2.5-mile Miners Ridge Loop Trail. Trail rehabilitation will include restoration of native habitat on eroded areas. The City also obtained an NCCP grant to conduct weeding around San Diego thorn mint populations within Black Mountain	Work on the Miners Ridge Loop Trail is currently in progress. Estimated completion mid- 2004. Weeding around the San Diego thorn mint was conducted in 2002 and continued in Spring of 2003.
Mission Bay Park	Site preparation for California least tern nesting.	All site preparation was completed and number of nests at Mariner's Point and North Fiesta Island look very good.
Mission Bay Park	Tecolote Creek Wetland Treatment Project	Design is 65% complete. Funding for construction being sought.

MONITORING EFFORTS:

City staff is initiating those elements of the MSCP Biological Monitoring Plan (CDFG 1996) that can be accomplished with currently available funding. The following summarizes the status of current and proposed monitoring activities:

Vernal Pool Inventory and Management Plan: The City of San Diego (City) received funding from the U. S. Fish and Wildlife Service (USFWS) in the form of a Section 6 Planning Grant to complete a citywide inventory of vernal pools. The recorded data, such as basin location and biological surveys, will be used to develop a management plan for vernal pools within the City's jurisdiction.

Between January and May 2003, City staff used Geographic Positioning System (GPS) technology to determine the exact location of vernal pools within the City of San Diego. Consultants also conducted vernal pool plant surveys to determine the vernal pool plant species within each vernal pool complex. City staff surveyed each site to determine the coverage of sensitive plant species within each vernal pool. Dr. Andrew Bohanak (San Diego State University) and Dr. Marie Simovich (University of San Diego) surveyed for fairy shrimp in many of the vernal pool complexes throughout the City of San Diego and collected fairy shrimp for genetic testing. Currently, the City of San Diego is aggregating all the data collected for the vernal pool inventory.

Habitat Quality Pilot Project (SDSU): Working with Dr. Doug Stow of SDSU, this project evaluated remote sensing for monitoring existing habitat conditions and the detection of changes over time. Initial efforts in 2001 demonstrated that permanent plots were ineffective for habitat quality monitoring due to limited area that could be sampled. Using Marron Valley as a pilot study site, City staff is comparing field data measurements of habitat quality with remote sensing imagery. The goal is develop a cost-effective methodology for evaluating habitat conditions across the MSCP study area. A final report will be completed in the fall.

Priority Plant Monitoring: In 2003, City MSCP staff and volunteers monitored the following covered plant species (copies of these reports are available):

- Short-leaved dudleya in Crest Canyon, Skeleton Canyon, Torrey Pines State Park, Torrey Pines Extension, and Carmel Mountain. Annual monitoring on Carmel Mountain began in 1999. All other surveys began in 2001.
- San Diego thornmint in Penasquitos Preserve, Sabre Springs, Black Mountain Ranch, and Mission Trails. Annual monitoring began in 2000 for all sites except Mission Trails, where monitoring began in 2001. In addition, the Friends of Los Peñasquitos Canyon Preserve have conducted some monitoring on this species since 1992.
- Nuttall's lotus in Mission Bay. Annual monitoring began in 2000.
- Willowy Monardella in Lopez Canyon, Upper Sycamore, and Marron Valley. Annual monitoring began in 2000.
- Variegated dudleya in Otay Lakes, Spring Canyon, Mission Trails Regional Park, Allied Gardens, Penasquitos Canyon, and Black Mountain Ranch. Annual monitoring began in 2001 with the Baseline Rare Plant Monitoring Project.

- Orcutt's brodiaea in Kearny Mesa, Sabre Springs, and Del Mar Mesa. Annual monitoring began in 2001 with the Baseline Rare Plant Monitoring Project.
- Cleveland's goldenstar in Del Mar Mesa and Mission Trails Regional Park. Annual monitoring began in 2001 with the Baseline Rare Plant Monitoring Project.
- Del Mar sand aster in Carmel Valley, Carmel Mountain and Torrey Highlands. Annual monitoring began in 2001 with the Baseline Rare Plant Monitoring Project.
- San Diego ambrosia in Mission Trails Regional Park. Annual monitoring began in 1999.

Quino Checkerspot Butterfly: City staff have conducted surveys throughout City-owned land during all flight seasons since 1998.

Southwestern Pond Turtles, Bats, and Arroyo Toads: The County of San Diego is conducting surveys for southwestern pond turtles, bat species, and arroyo toads. The surveys locations include lands within the City of San Diego such as Otay Lakes, San Vicente Reservoir, Penasquitos Canyon, Mission Trails and Barrett Lake. Surveys have been conducted on some sites in 2002 and will continue into 2003. Preliminary reports are available at www.mscp-sandiego.org. It is expected that surveys will be completed in 2004.

Burrowing Owls and Other Raptors: Funded by an NCCP grant, the City has contracted Wildlife Research Institute to conduct burrowing owl and other raptor surveys in Otay Mesa. A final report of the survey effort was provided in March 2003. A copy of this report is available. The City of San Diego has also received grant funding to construct burrowing owl dens and develop a burrowing owl management plan for areas where the burrowing owl dens are constructed. This grant project is currently in the preliminary phases.

Develop Monitoring Database: City staff is working with SANDAG, the County and the wildlife agencies on a pilot project for the development of a monitoring database to track the monitoring and management activities. This project is funded by an NCCP grant. It is proposed that the information from this database will be made available via the internet to interested stakeholders. A database format has been developed and is currently being tested.

Wildlife Corridor Monitoring: Wildlife corridor monitoring is being conducted in various sites throughout the City of San Diego by Conservation Biology Institute (CBI). Several stations, including some with cameras, have been set up to track and document wildlife moving through the corridor. A copy of the report produced for this effort is available. In addition, CBI will be conducting a deer tracking study funded by the Environmental Conservation Foundation using radio collars within the Carmel Valley area. This project is in the preliminary stages and will most likely commence in 2004.

Specific monitoring efforts set for Spring 2004 will be coordinated with the wildlife agencies and the County of San Diego.

TRAINING AND PUBLIC OUTREACH:

Since 1999, members of the public and government staff have been able to access information on

the MSCP through the City's website. Located at www.sandiego.gov/mscp/ the site contains general information on the MSCP, as well as some program-related documents and maps, and City contact information. Mayor Dick Murphy's staff has designed a web page to highlight the Mayor's ten goals for the City of San Diego. These goals are available for review online at <http://genesis.sannet.gov/infospc/templates/mayor/index.jsp>. Goal Ten is to "Complete MSCP Open Space Acquisitions." This website provides information on the MSCP land acquisitions priority areas (Del Mar Mesa, East Elliott, and Otay Mesa), annual workshop reports, regional funding information and hyper-links to other state and federal websites.

MSCP staff continues to participate in training of other City staff with the focus on education of regulations associated with the MSCP and the Environmentally Sensitive Lands ordinance. MSCP staff provided presentations to City staff at regularly scheduled Project Management Academy trainings given to City operational personnel. Additionally, MSCP staff has made presentations to various public organizations including local high schools, Park and Recreation workshops, and the San Diego River group. Additional efforts are being discussed through the multi-jurisdictional MSCP Education Outreach committee, a formally recognized subcommittee of the MSCP Interagency Coordination Committee.

CONCLUSION:

Since the adoption of the City's MSCP Subarea Plan in July 1997, significant achievements have occurred which continue to contribute to the successful implementation of the City's MSCP Subarea Plan. During the 2002 reporting period, 407.1 acres of habitat were conserved in the MHPA and 103.2 acres were conserved adjacent to the MHPA. Of the 528.5 acres of habitat that was impacted due to project approvals within this same time period, 88 percent of the loss occurred outside of the MHPA. In 2002, 161 new projects were reviewed for consistency with the City's MSCP Subarea Plan.

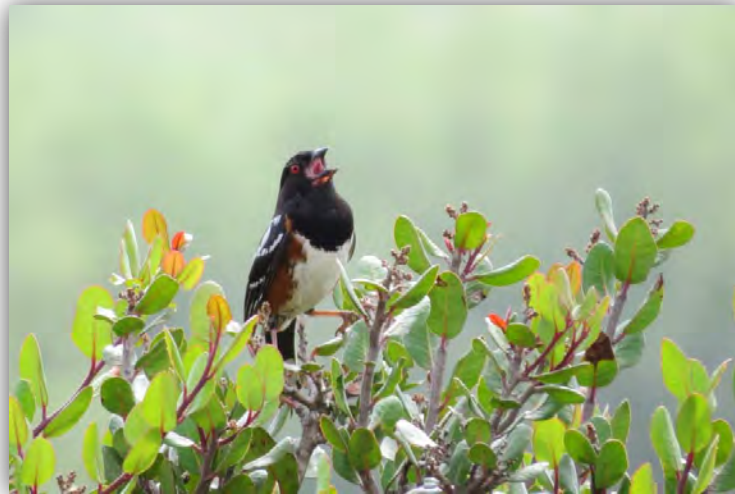
The City continues to be successful in securing state and federal grants, many of which have been instrumental in providing for MHPA acquisitions and ongoing management and monitoring activities as described in this report. All key acquisitions, from willing sellers, in Del Mar Mesa have been completed since the last reporting period. Additional significant acquisitions of private land in East Elliott are expected to occur over the next year. Additional information on the status of the MSCP is available through the City's website. The City's MSCP Subarea Plan program objectives for the first six years have been achieved.

Keith Greer, Deputy Planning Director
Planning Department

KG:JK:ah

Canyon Sewer Cleaning Program and Long Term Sewer Maintenance Program Progress Report

City of San Diego
Public Utilities Department



2014 Annual Report
July 1, 2013 – June 30, 2014



Cover: Top: Spotted Towhee singing on lemonadeberry (Paver), Bottom: Sewer Repair and Manhole

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ACRONYMS AND ABBREVIATIONS

ACOE	Army Corps of Engineers
BMP	Best Management Practices
CDFW	California Department of Fish and Wildlife
CIP	Capital Improvement Project
DSD	Development Services Department
MEAP	Long Term Maintenance and Emergency Access Plan
MHPA	Multiple Habitat Planning Area
OSCAC	Open Space Canyons Advisory Committee
PEIR	Programmatic Environmental Impact Report
PEP	Plant establishment period
Program	Canyon Sewer Cleaning Program and the Long-term Canyon Sewer Maintenance Program
Public Utilities	City of San Diego Public Utilities Department
ROF	Redirection of Flow
SCR	Substantial Conformance Review
WWC	Wastewater Collection Division

EXECUTIVE SUMMARY

In response to an Administrative Order from the U.S. Environmental Protection Agency, in an effort to reduce sewer spills and beach closures, and under the direction of Council Policies 400-13 and 400-14, the City of San Diego's Public Utilities Department (Public Utilities) has adopted the Canyon Sewer Cleaning Program and the Long-term Canyon Sewer Maintenance Program (Program) to access, clean, and repair miles of sewer infrastructure located in canyons and other environmentally sensitive areas.

A Programmatic Environmental Impact Report (PEIR) was prepared to study the Program and in July 2004 the City of San Diego approved Coastal Development Permit No. 13506 and Site Development Permit No. 13507 for the Program.

The objectives of the Program are:

- To complete the inspection and cleaning of City of San Diego sewer infrastructure located in canyons and other environmentally sensitive areas.
- To identify and implement efficient, effective, and environmentally sensitive means to accomplish the necessary canyon sewer cleaning activities.
- To provide for long-term maintenance of canyon sewer infrastructure, recognizing that availability of access to the infrastructure is essential for an effective long-term program, in accordance with Council Policy 400-13.
- To evaluate and pursue options to redirect sewage flows out of canyons and into street sewer lines or other accessible areas, where feasible and appropriate pursuant to Council Policy 400-14.

This annual report, as required by the site development permit condition 27, provides a Progress Report to the Open Space Canyons Advisory Committee (OSCAC) on the Program for the year from July 1, 2013 through June 30, 2014. This report provides the status of all Program activities within the reporting year, including habitat mitigation, long term access planning and implementation, construction and emergency projects, and 25 month revegetation and restoration projects.

LONG TERM ACCESS PROJECTS

Long Term Sewer Access Projects provide access paths to sewer infrastructure for ongoing maintenance, inspections, and cleaning. One of the first steps in determining whether an access path is needed is to prepare a redirection of flow (ROF) study. A ROF study evaluates the economic feasibility of removing all or part of the sewer from an environmentally sensitive area or canyon versus providing access to the sewer if it remains in place.

When redirection of flow is found to be infeasible from all or portions of environmentally sensitive areas/canyons, Public Utilities staff develop a Long Term Maintenance and Emergency Access Plan (MEAP) in accordance with Policy 400-13. Public Utilities staff prepares and submits a Substantial Conformance Review (SCR) packages to the Development Services Department (DSD) for a determination whether the proposed mitigation, restoration, and access planning for individual canyon areas or project is in conformance with the PEIR and Program master permits. Project specific design plans are then prepared as necessary to provide specific direction on access improvements and construction that include additional information necessary to obtain regulatory agency permits. Separate permits or clearances are obtained from the regulatory agencies prior to implementation of long term access projects.

The following canyons are in various stages of long term access planning and implementation:

- 32nd Street – Sewer access paths located in upland areas have had wood chips installed and are currently being used by the Wastewater Collection (WWC) Division. Public Utilities staff received regulatory agency permit approval to construct access path improvements at streambed crossings; however, Public Utilities is currently analyzing an alternate path alignment to avoid wetland impacts to streambeds. Public Utilities is working with Real Estate Assets Department to acquire an easement to build a portion of the upland access path on private property. The new access paths will be constructed by the WWC Division.
- Alvarado – The long term sewer access plan has been approved in concept and the detailed access path design for this project is complete. Public Utilities staff is working on the environmental permits, property acquisition, and developing contract documents.
- Black Mountain – Implementation of long term sewer access for this canyon has been completed. Public Utilities staff are working with the Park and Recreation Department on finalizing a Memorandum of Understanding for the ongoing maintenance and use of access paths.
- Park Mesa – City forces completed construction of the long term access path in the summer of 2011. The project required easement acquisition from four

property owners. All easements have been acquired. This access project is complete and the WWC Division will continue to maintain the path for ongoing sewer inspections, cleaning and maintenance.

- Rancho Mission – Public Utilities reassessed the canyon access plan, identified an alternative access using existing paths, and eliminated the need for one stream crossing. Access path improvements on the east side of Margerum Avenue were completed by City forces in November 2011. Environmental permits were obtained from the regulatory agencies in 2013 to construct an improved streambed crossing. The design and construction of the streambed crossing on the west side of Margerum Avenue was completed in November of 2013.



Rancho Mission – Improved Streambed Crossing

- Tecolote East – Design drawings have been prepared that include numerous streambed crossing improvements. Public Utilities staff has started on the resource agency permit applications and developing contract documents for constructing the access path improvements. Improvements will be necessary to provide access to the manholes located in the streambed areas.
- Norfolk Canyon – Public Utilities staff is awaiting final regulatory agency approvals for the upsizing of one pipe culvert along the existing access path. Following the receipt of the permits, City crews shall initiate this work.
- Home Avenue Trunk Sewer – Public Utilities staff is in the process of completing the SCR submittal, including the Long Term Access Plan, MEAP, and environmental studies.
- Lopez Manhole 13 – A partial implementation of the long term access project in Lopez Canyon occurred during this reporting period. A manhole that had been

previously inaccessible for cleaning was accessed in the Fall of 2013. City crews tracked over low growing vegetation to gain access to the manhole. No grading, filling, or permanent improvements will be made to the new sewer access path.



Lopez Canyon –Towing Cleaning Equipment to Manhole 13

- South Chollas – Public Utilities completed the Long Term Access plan, MEAP, and all preliminary environmental studies. Staff has submitted the SCR package to the DSD for approval. Following approval, paths located in upland areas will be constructed by City forces. Detailed design drawings will be prepared for the streambed crossing improvements.
- North, Central, and Southern Tecolote Canyon – A Long Term Access Plan Technical Memorandum for all three sections of Tecolote Canyon was completed in 2013 and incorporated into a planning study and scope of a larger Capital Improvement Projects (CIP) project. The Technical Memorandum includes the design criteria of all access paths and streambed crossing improvements. The design criteria will be included in the design of the CIP Project when it moves forward.
- VanNuys Canyon – A new ROF Study and Access Recommendation have been completed and the project will be proceeding with long term access design.
- Mt. Elbrus – In November, 2011, WWC installed a prefabricated fiberglass bridge in Mt. Elbrus Canyon as partial long term access implementation. Public Utilities staff is currently designing three additional stream crossing improvements and is starting on agency permits for anticipated construction in 2015.



Mt. Elbrus Canyon- Long Term Access Area In Design

- Manning Canyon – Public Utilities is beginning the process for the SCR submittal, including the Long Term Access Plan, MEAP, erosion control plan and environmental studies.
- Interstate (I)-15 & Balboa – Public Utilities is beginning a ROF study to determine if canyon sewer facilities can be abandoned and if sewer flows can be redirected to Right-Of-Way areas.

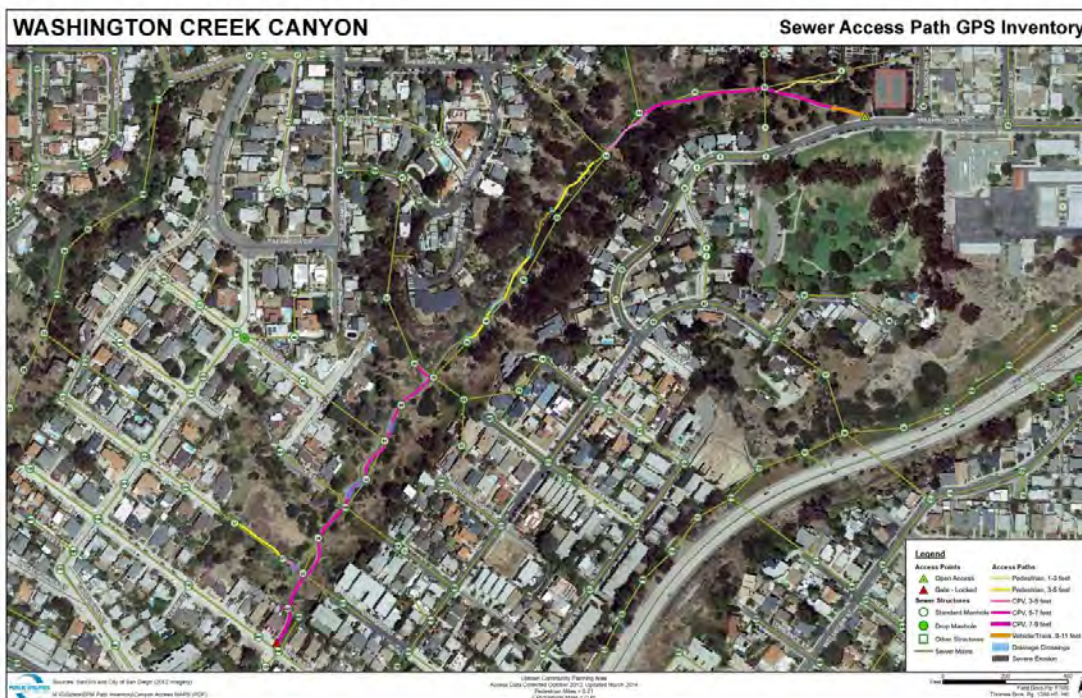
MAINTENANCE, MONITORING, AND MAPPING

Wastewater Collection Division staff coordinated closely with Environmental Staff (Environmental Section) in ensuring daily activities were in compliance with the Program’s master permit, agency permits, and environmental regulations.

Environmental training is provided to all Public Utilities staff working in canyons/environmentally sensitive areas. Crews are directed to contact staff in the Environmental Section for guidance and support for work that may impact sensitive resources.

The Environmental Section reviews daily field work reports, facilitates monthly meetings to discuss and review all work in canyons, obtains permits, and provides daily support to field crews. Work conducted in canyons/environmentally sensitive areas is monitored by the Environmental Section. Bird nesting surveys, vegetation and sensitive species mapping, jurisdictional delineations and other biological surveys are completed by the Environmental Section for daily WWC operation and maintenance of sewer lines in canyons.

Public Utilities has increased its efforts to inventory and map existing access to sewers in canyons. This inventory provides information on existing access conditions, identifies access needs and areas of concern), and facilitates ongoing maintenance. To date, 165 miles of pedestrian and vehicular paths have been mapped with the GPS data for 136 canyon areas. Vehicle access path data is updated quarterly and is available on SanGIS.



Access Path Inventory Map for Washington Creek Canyon

CONSTRUCTION AND EMERGENCY PROJECTS

During this reporting period seven CIP projects were completed or are still in construction: GJs 616, 672A, 693, 703A, 787, and GJ 799 Alvarado TS PH IIIA. Planning and permitting is complete or in process for a number of additional projects that are anticipated once contracting is complete or funding is available. These include Group Jobs 833, 836, 965, 966, Sewer Rehabs AG-1, AB-1 and Z-1, Skylark Canyon sewer, Rose Canyon TS Joint Repair, Tecolote Canyon and Manning Canyon sewer abandonment projects. These jobs are managed by the Engineering and Capital Projects, Public Works Department.

Since July of 2013, emergency projects and/or pipeline/manhole repair projects occurred in the following canyons or environmentally sensitive areas:

Emergencies

- Buchanan Canyon Sewer Blockage (blocked pipe, pipe repair, access)
- Camino Del Rio South (blocked pipe, buried manhole, cleaning)
- Tecolote North Pipe Repair (pipe repair and protection)
- Spruce Mh 220 (manhole replacement)
- Siesta Drive (pipe repair)
- El Camino Real (Sewer Spill)

Other construction projects

- I-15 Buried Manhole 9 (manhole locate and raise)
- Loma Pass Buried Manhole (manhole locate and raise)
- Market Street MH (manhole locate and raise)
- San Diego River West (temp access, manhole raise, cleaning)
- Famosa Slough Pipe Repair (spot repair)
- Spruce Canyon Pipe Repair (pipe repair)
- Manning Canyon Sewer Repair (pipe repair)
- Camino Del Rio North Mh Replacement (manhole maintenance)
- Switzer Canyon MH 152 Access (access creation, cleaning)
- Washington Creek Access Path (path improvements)
- Switzer Sinkhole Repairs (access path maintenance)
- Ash Street and Granada Repair (pipe repair)
- 28th Street Access (path maintenance)
- Sweetwater MH 3 Repair (manhole maintenance)
- Juniper Street Spot Repair (pipe repair)
- Tecolote North Access (path maintenance)
- Pump Station 77 Force Main Inspection (pipeline inspection)
- Old Town McCoy House Sewer Repair (pipe repair)
- Otay Valley Trunk Sewer Pipe Protection (pipe protection)

Public Utilities crews completed access path maintenance in multiple canyon areas to facilitate access for cleaning, inspections and maintenance. Path maintenance is usually limited to trimming or mowing vegetation that has grown on the pathways. Maintenance on the access path precedes manhole cleaning and maintenance.

Public Utilities staff manages emergency and non-CIP construction projects. Environmental review, monitoring, and reporting are done in adherence with the Program. Biological assessments have been prepared and permits have been obtained as necessary for these emergency and construction projects. Following construction, revegetation and/or restoration has been implemented in accordance with the Program.



Spruce Canyon Pipe Repair



San Diego River West Manhole Raise and Cleaning



Buchanan Emergency Sewer Blockage Emergency Access and Repair

25 MONTH REVEGETATION AND RESTORATION PROJECTS

Conditions of the Master permit require effective erosion control of access paths and restoration of temporarily impacted areas outside of permanent access paths following construction. Each impact area is monitored and maintained for a period of no less than 25 months.

Revegetation sites include all areas required for permanent access to utilities including the access paths, turn-arounds, and work areas around manholes. When new access paths and permanent access areas are created, revegetation is required. The goal of revegetation is successful erosion control. Maintenance and monitoring of revegetation areas may include hydroseeding or hand-seeding, weeding, mulching or installing wood chips on the path, installation of temporary Best Management Practices (BMPs), site monitoring or a combination of the above treatments.

Restoration sites are areas impacted outside of permanent access areas. Restoration areas are typically staging areas, emergency access or work areas, pipeline repair areas, unauthorized impact areas, or areas disturbed as a result of temporary widening of pathways. The goal of habitat restoration is re-establishment of native habitat. Restoration areas shall obtain native plant coverage equal to the native species present in the adjacent area or 30% coverage, whichever is greater. Restoration areas shall support no more than 1% perennial weeds and no more than 10% annual weeds during the 25 month maintenance period. Maintenance and monitoring of restoration areas may include hydroseeding or hand-seeding, installation of container plants, weeding, installation of temporary BMPs, temporary irrigation, site monitoring or a combination of the above treatments.

Seed and plant material used for revegetation and restoration efforts is from locations within 25 miles of the coastline in San Diego County. Maintenance and monitoring of all sites continues for 25 months or until successful erosion control is achieved on the paths and/or restoration goals are met outside of the paths.

During this reporting year, ten (10) sewer revegetation projects were completed. In addition to eleven (11) ongoing projects, nine (9) additional sites were installed and maintenance and monitoring of these sites was initiated.

Updates on the status of the revegetation and restoration projects are a regular agenda item at OSCAC's meetings. See Attachment A for the July 2014 Revegetation and Restoration Projects Status update table.



Pump Station 77 Forcemain Restoration Area

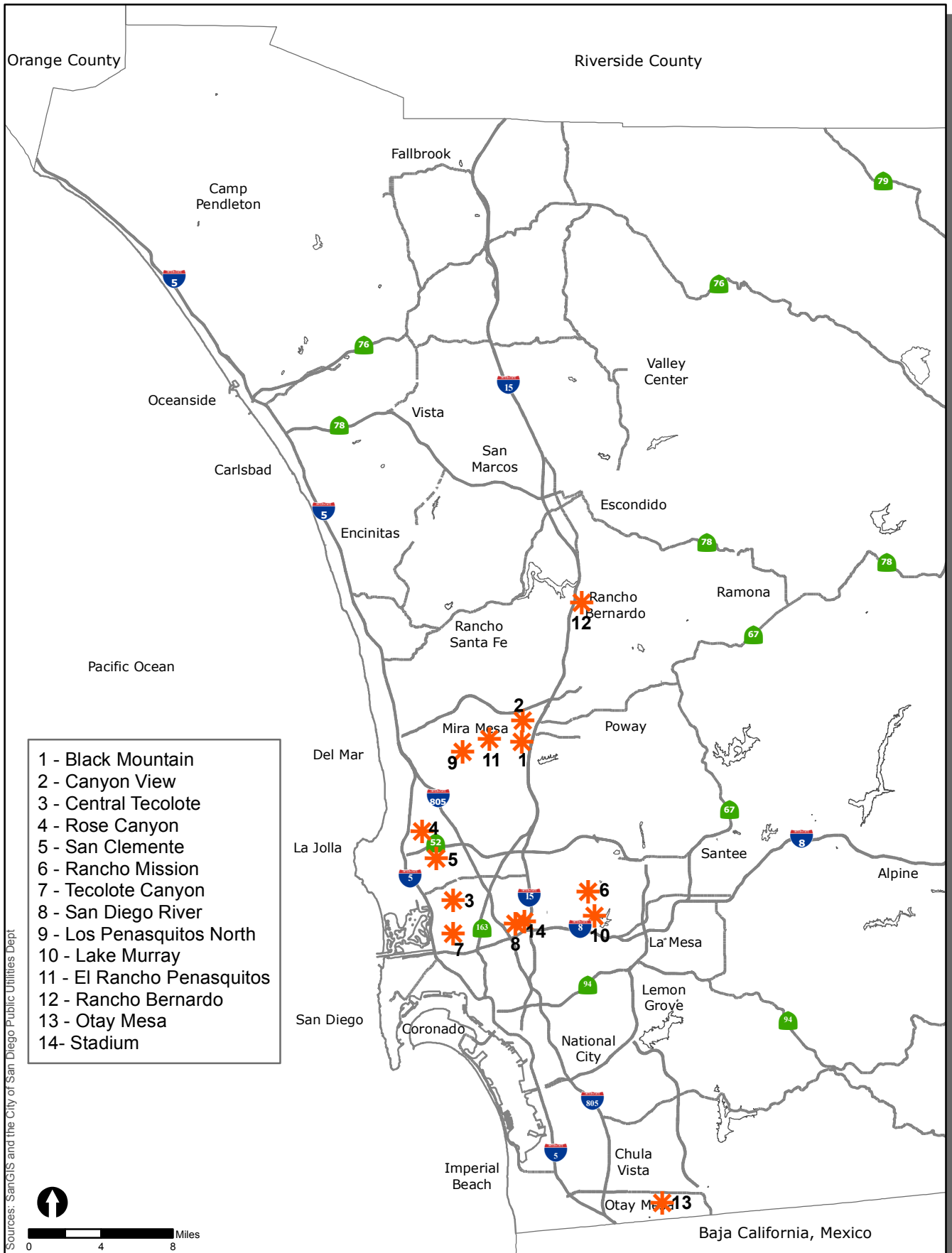


Spruce MH 220 Replacement Revegetation (erosion control) Project

MITIGATION PROJECTS

In accordance with applicable local, state, and federal regulations, restoration, revegetation, or mitigation is required for significant biological impacts resulting from the Program, such as the creation of access paths through environmentally sensitive areas, emergency repairs, and pipeline repair projects. In order to mitigate these impacts, Public Utilities staff has identified and implemented a number of habitat mitigation projects located within various watersheds where past, current, or future impacts have or may occur. These mitigation sites are designed and built to accommodate numerous Public Utilities projects. Allocation of mitigation is completed as each project is planned, permitted and constructed. Post construction adjustments are made to mitigation assignments based on actual project impacts. Project impacts and mitigation assignments are tracked internally within the Canyon Database. A summary of acreages available, assigned and the balance is included as Attachment B. A more detailed summary of assignments is included as Attachment C.

The location of these projects is shown in Figure A. The status of each habitat mitigation project is summarized below.



**PUD Mitigation Sites
 Overview Map**

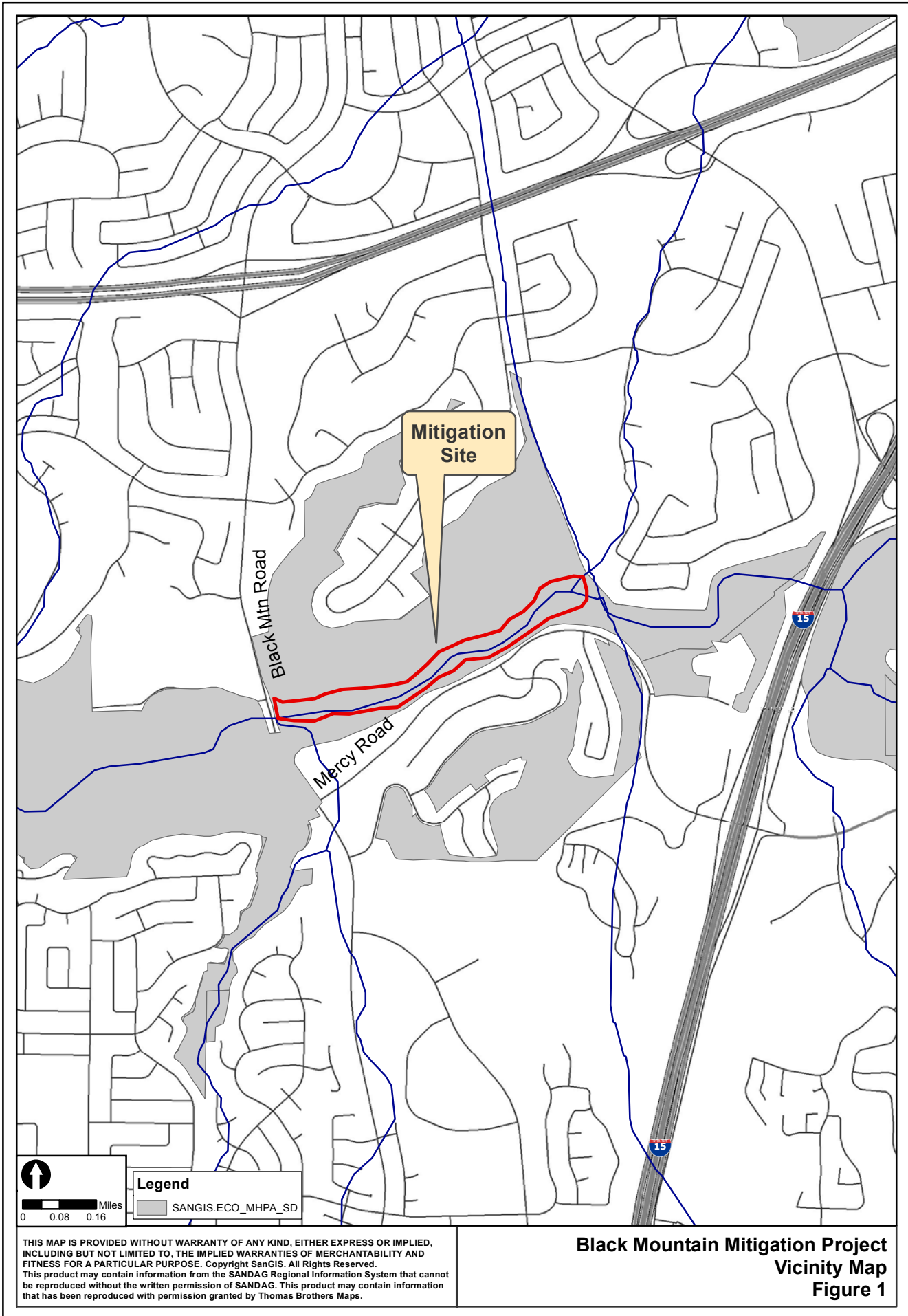
**FIGURE
 A**

Black Mountain Wetland Mitigation Project

This project is currently on hold pending discussions between Park and Recreation Department and Public Utilities. If the project is determined feasible, Public Utilities will proceed with resource agency submittals and approvals to implement this project to serve the mitigation needs of the Public Utilities for impacts within the Los Penasquitos Canyon Preserve. This project would be located west of I-15, east of Black Mountain Road, and north of Mercy Road in Los Penasquitos Canyon (Figure 1). The project area currently supports a large area of invasive non-native plant species that has little value for wildlife. The site currently supports eucalyptus (*Eucalyptus* spp.), Canary Island date palm (*Phoenix canariensis*), Mexican fan palm (*Washingtonia robusta*), Brazilian pepper tree (*Schinus terebinthifolius*), pampas grass (*Cortaderia selloana*), and tamarisk (*Tamarix parviflora*). The goal of the project would be to eradicate all non-native plant species and create native wetland habitat in areas of disturbed uplands. Project components would include weed removal, grading, installation of a temporary irrigation system, planting, seeding, and a 5 year maintenance and monitoring period. Anticipated mitigation credits would be 1.17 acres of wetland creation and 0.79 acres of wetland enhancement.



Black Mountain Mitigation Project Site



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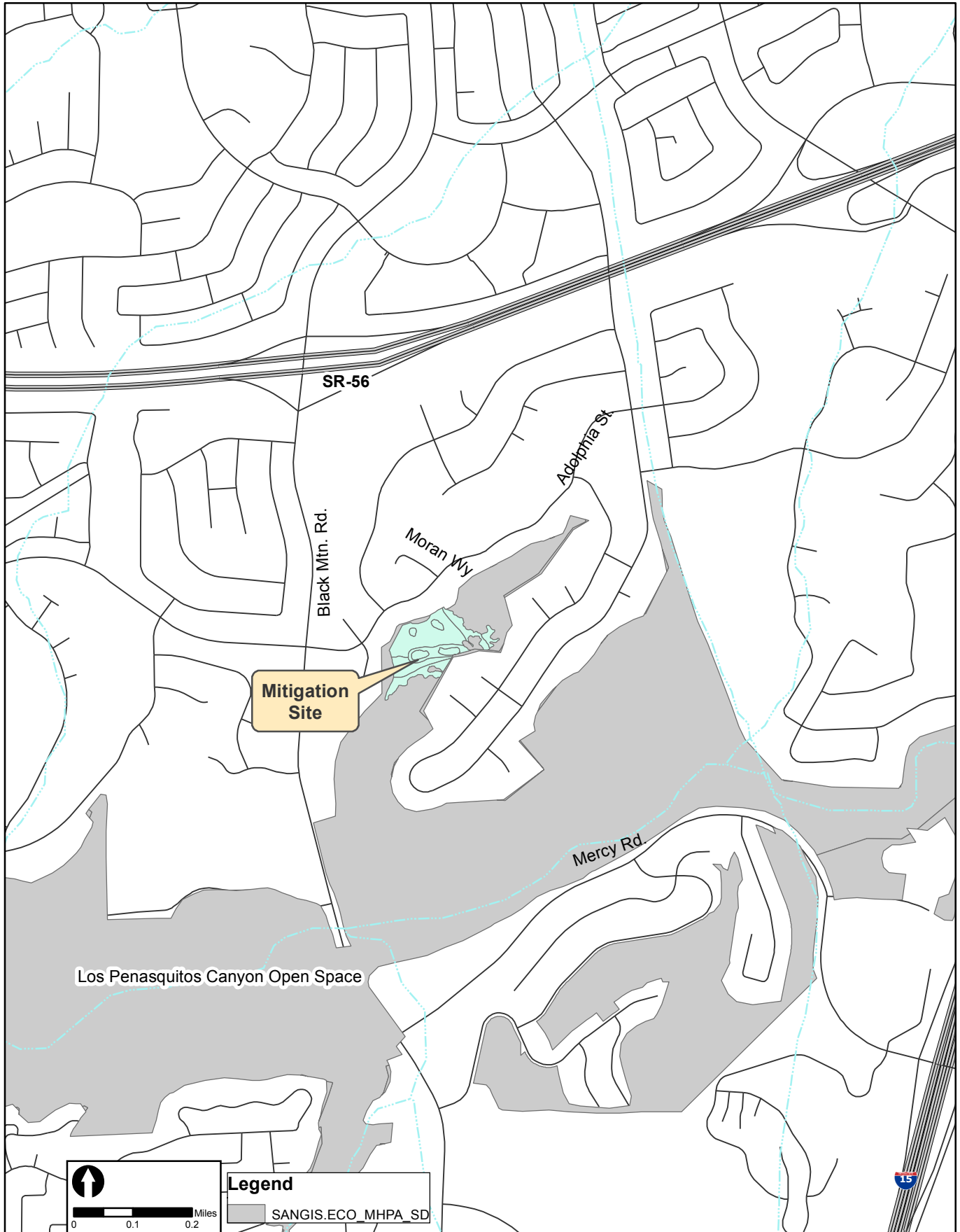
**Black Mountain Mitigation Project
 Vicinity Map
 Figure 1**

Canyon View Upland Restoration Mitigation Project

Construction began in September 2011 for this project, located east of Black Mountain Road and south of Adolphia Street in Los Penasquitos Canyon (Figure 2). The project involves the restoration of approximately 0.9 acres of native grassland and 6.79 acres of Diegan coastal sage scrub habitat, located on City of San Diego owned parcels within Los Penasquitos Canyon. The project serves to mitigate impacts associated with Public Utilities projects located in Los Penasquitos Canyon Preserve. Exotic species removed from the site include: mustard (*Brassica* sp.), artichoke thistle (*Cynara cardunculus*), tocalote (*Centaurea melitensis*), and many non-native grass species. The project is using recycled water for temporary irrigation during the plant establishment phase. Coastal California gnatcatchers (*Polioptila californica californica*) have been observed foraging onsite within the Diegan coastal sage scrub habitat. The site is currently in year 2 of the 5 year maintenance and monitoring period. The site will be maintained and monitored for the 5-year period until agency sign off. The goal of the project is to restore low quality non-native uplands into high quality native habitats.

Mitigation Credits			
Habitat Type	Acres	Assigned	Balance
Diegan Coastal Sage Scrub (Tier II)	6.49	1.62	4.87
Native Grassland (Tier I)	0.89	.02	0.87





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**Canyon View Upland Restoration Mitigation Project
Vicinity Map
Figure 2**

Central Tecolote Enhancement Mitigation Project

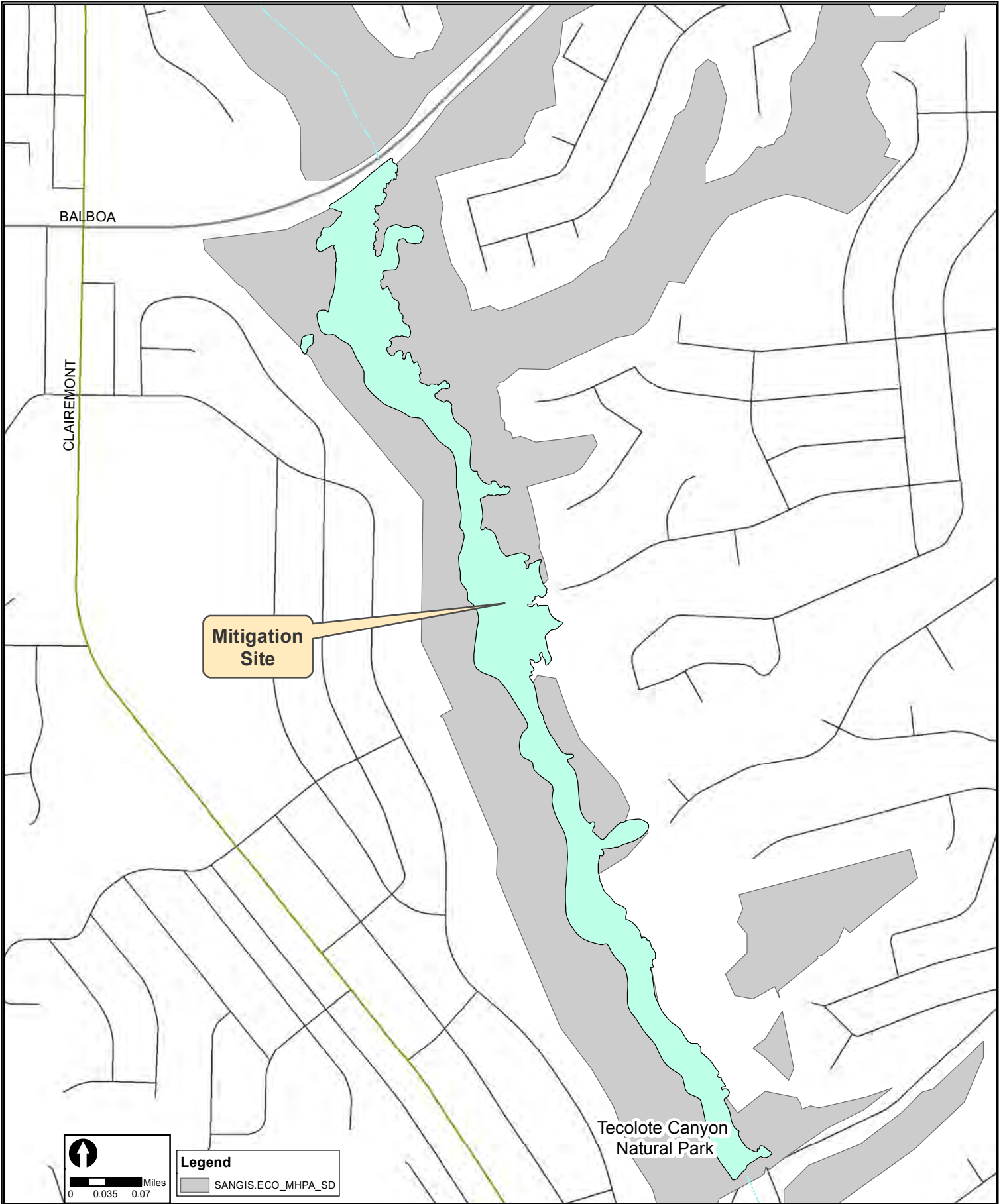
This project is currently in year 3 of the 5-year maintenance and monitoring period. This project is located south of Balboa Avenue and north of Mt. Acadia Boulevard in Tecolote Canyon (Figure 3). The project consists of riparian enhancement and native grassland/coastal sage scrub restoration in addition to a weed management area that encompasses Tecolote Creek.

Exotic species removed from the site include: Brazilian pepper tree, pampas grass, Mexican fan palm, Canary Island date palm, eucalyptus, fennel (*Foeniculum vulgare*), mustard, and yellow sweetclover (*Melilotus indicus*). Maintenance activities completed this year include weed and trash removal, plant replacement, additional seeding, and site protection repair. The site will be maintained and monitored for a minimum 5-year period to ensure successful establishment of native species and until agency sign off.

Coastal California gnatcatchers have been observed foraging onsite within the Diegan coastal sage scrub habitat. Vandalized bat boxes have been re-installed to provide roosting opportunities along the creek. Motion detector cameras have captured wildlife usage of the site.

Mitigation Credits			
Habitat Type	Acres	Assigned	Balance
Oak Riparian Forest	7.95	2.43	5.52
Diegan Coastal Sage Scrub (Tier II)	1.69	0.61	1.08
Native Grassland (Tier I)	1.36	0.10	1.26





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**Central Tecolote Mitigation
Vicinity Map
Figure 3**

Rose Canyon Mitigation Project

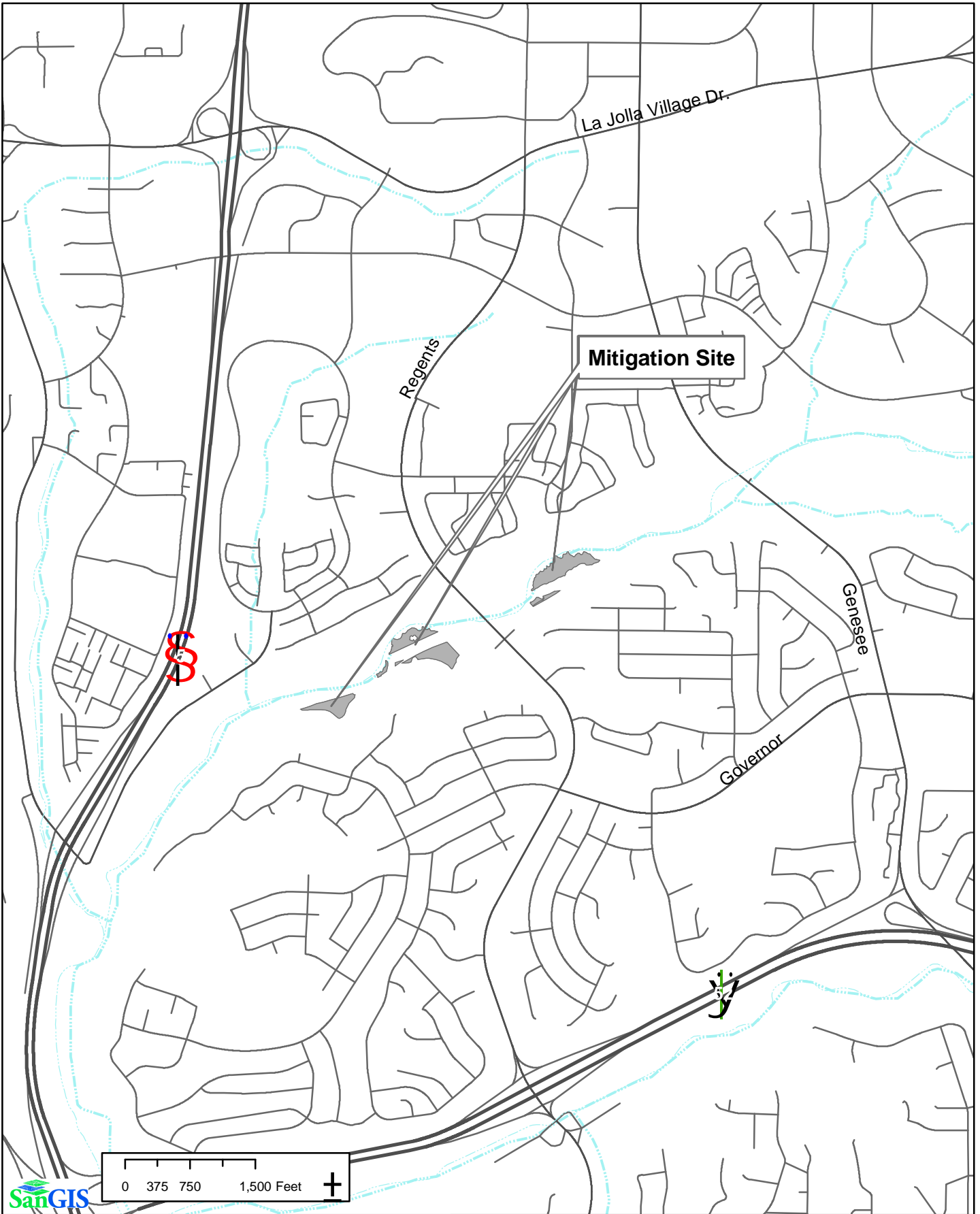
The Rose Canyon Mitigation Project is located in the Rose Canyon Open Space Park, starting approximately one half mile west of Genesee Avenue and continuing another one half mile further west into the park (Figure 4).

Approximately 4.36 acres of oak riparian forest, southern cottonwood-willow riparian forest, and mule fat scrub were created adjacent to Rose Creek. Approximately 3.67 acres of Diegan coastal sage scrub habitat was planted on the upland areas.

Construction was initiated in September 2007 and included clearing of non-native vegetation, grading, installation of a temporary irrigation system, planting, hydroseeding, fencing, and sign installation. The initial revegetation installation was accepted in March 2008, when the site entered the 120-day plant establishment period (PEP). The project entered the 5-year maintenance period on July 15, 2008. The project has completed 5-year of maintenance and is awaiting Corps regulatory sign-off. Vegetative cover at the site is very high, uplands habitat exceeds 80% cover and has a high diversity of species that includes California sagebrush (*Artimisia californica*), white sage (*Salvia apiana*), coyote bush (*Baccharis pilularis*), and San Diego goldenbush (*Isocoma menziessii*). The wetland creation habitat exceeds 100% cover in sections of the project area with canopy height reaching 10 to 15 feet; a number of cottonwood (*Populus* spp.) and willow (*Salix* spp.) recruits were recently observed on the site. Available mitigation acreage below reflects actual acreage of habitats restored at the end of the year 5 maintenance period.

Mitigation Credits			
Habitat Type	Acres	Assigned	Balance
Riparian Forest- creation	5.05	3.44	1.87
Riparian Forest – enhancement	0.61	0.35	0.26
Diegan Coastal Sage Scrub	4.75	2.95	1.80
Native Grassland	0.28	0.20	0.08





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Rose Canyon Mitigation Site
Vicinity Map

Figure 4

San Clemente Canyon Mitigation Project

The San Clemente Canyon Mitigation Project provides mitigation for impacts associated with Public Utilities projects within San Clemente Canyon/Marian Bear Memorial Park and surrounding watershed. The project is located at two sites within the park, one just east of the Regents East parking area and the other approximately three-fourths of a mile east of the Genesee parking area (Figure 5).

The project includes the creation of 2.86 acres of wetland habitat (southern willow riparian forest and oak riparian forest) and 2.81 acres upland habitat (Diegan coastal sage scrub and oak woodland).

Construction was initiated in October 2007. The site reached its 5-year maintenance and monitoring period in September 2013 and is currently awaiting regulatory sign-off from the Army Corps of Engineers (ACOE). The upland and wetland planting areas for the project have shown steady establishment of target species with vegetative cover in portions of the wetland habitat over 100% cover. The wetlands support a willow over story and a well developed understory including species such as California rose (*Rosa californica*) and San Diego marsh elder (*Iva hayesiana*). Available mitigation acreage below reflects actual acreage of habitats restored at the end of the year 5 maintenance period.

Mitigation Credits			
Habitat Type	Acres	Assigned	Balance
Riparian Forest	2.86	2.06	0.80
Diegan Coastal Sage Scrub	2.42	1.67	0.75
Oak Woodland	0.39	0.39	0





Miles
0 0.1 0.2

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**San Clemente Mitigation Project
 Vicinity Map
 Figure 5**

Rancho Mission Canyon Wetland Enhancement Project

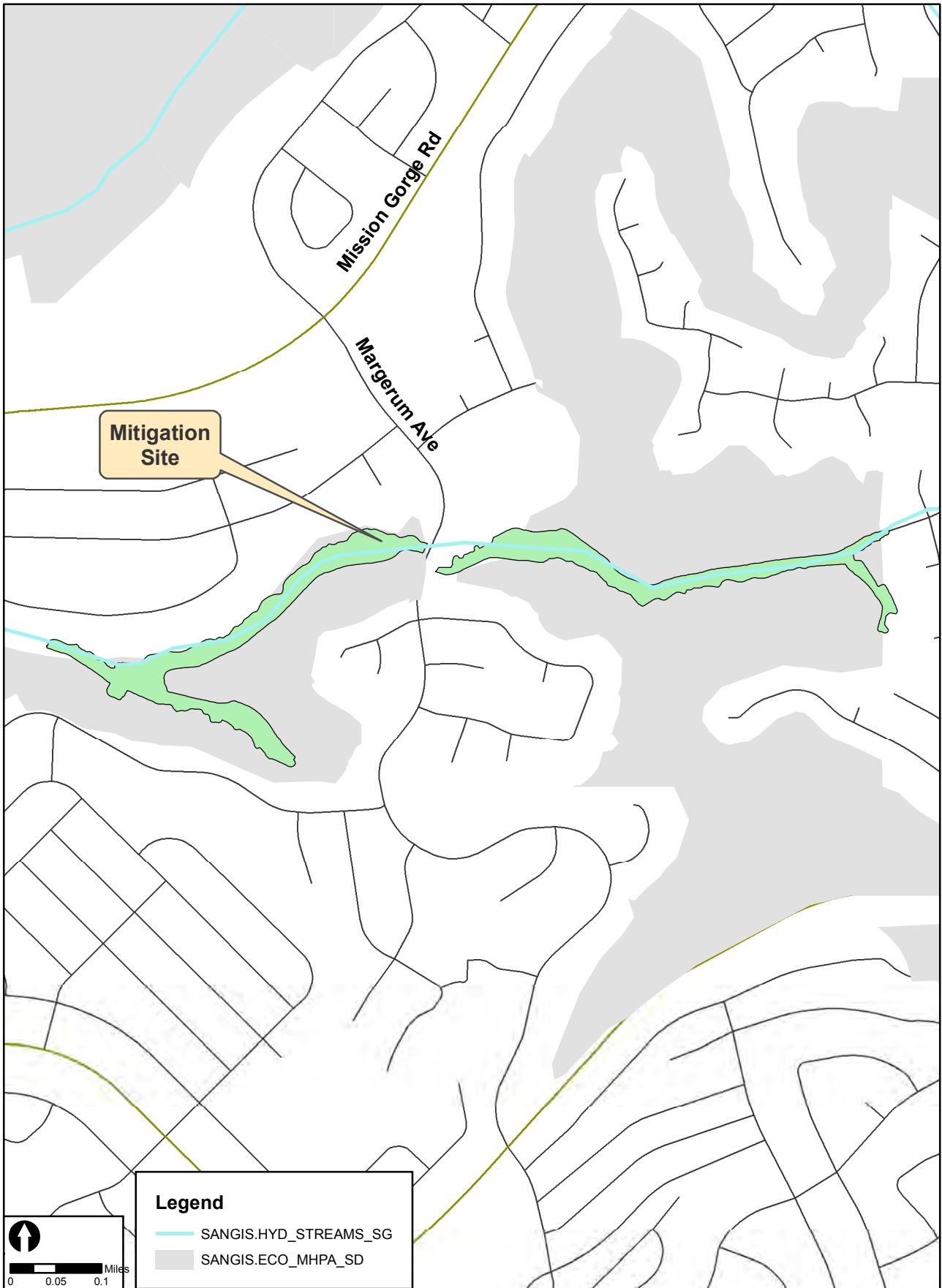
The Rancho Mission Canyon Wetland Enhancement Project is located in the City’s Rancho Mission Canyon Open Space Park, south of Mission Gorge Road, north of Navajo Road, and on either side of Margerum Way in the Allied Gardens Community of the Navajo Community Planning Area (Figure 6).

The Rancho Mission Mitigation Project includes the enhancement of 7.59 acres of wetlands and restoration of 1.53 acres (75% mitigation credit) of wetland transitional habitats. Non-native vegetation was removed from the canyon, followed by revegetation with native southern willow scrub and wetland transitional species. The total area of habitat enhancement runs the entire canyon bottom and encompasses more than 13.5 acres. Exotic species targeted for eradication include: salt cedar (*Tamarix* sp.), myoporum (*Myoporum laetum*), Brazilian pepper tree, pampas grass, Mexican fan palm, and eucalyptus.

The site completed the 5-year long-term maintenance and monitoring period in March 2013. The site currently supports target native cover of approximately 95%, exceeding the year 5 goal of 90%. Regulatory sign-off and approval for the project was received in the summer of 2013. A few individuals of non-native plants were observed during the annual monitoring but are being treated by Park and Recreation as part of long term management of the site.

Mitigation Credits			
Habitat Type	Acres	Assigned	Balance
Southern Willow Scrub	8.74	2.13	6.61





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**Rancho Mission Mitigation
 Vicinity Map
 Figure 6**

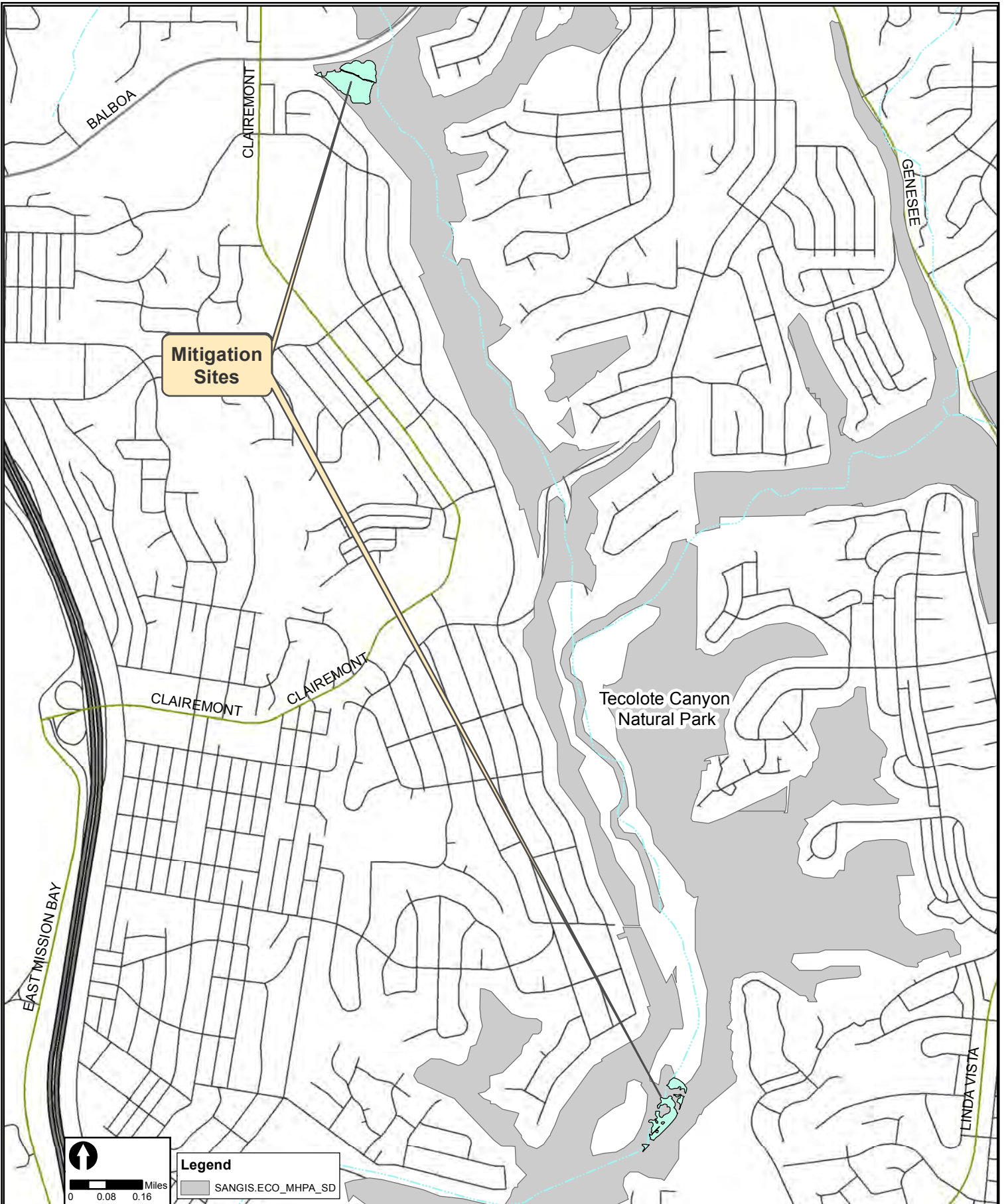
Tecolote Canyon Mitigation Project

The Tecolote Canyon Mitigation Project provides mitigation for impacts associated with projects within Tecolote, Mt. Elbrus, East Clairemont, and Manning Canyons. The Balboa site is located south of Balboa Avenue, and the Grove site is located south of the Tecolote Golf Course and north of the University of San Diego (Figure 7).

The project includes the creation of 1.61 acres of wetland habitat (southern willow scrub, southern cottonwood willow riparian forest, and oak riparian forest) and restoration of 3.37 acres upland habitat (Diegan coastal sage scrub & native grassland). Construction was initiated in February 2007 and the 5-year maintenance and monitoring period began in January 2008. The 5-year success criteria of 80% coverage of wetland vegetation transects has been met and 75% coverage of upland vegetation transects has been exceeded for the project. The site completed its 5-year maintenance and monitoring in the early part of 2013 and has received regulatory sign-off. A qualitative review of the site in spring of 2014 estimated vegetative cover to be approximately 95% the Diegan coastal sage scrub habitats, and 80% in the riparian areas. The site appeared dry during the annual monitoring with minimal plant mortality. Remnant signs and posts were observed and will be removed in the fall of 2014 after nesting season has concluded.

Mitigation Credits			
Habitat Type	Acres	Assigned	Balance
Riparian Forest	1.19	0.98	0.21
Southern Willow Scrub	0.42	0.42	0
Diegan Coastal Sage Scrub/Native Grassland	3.37	3.35	0.02





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**Tecolote Canyon Mitigation
Vicinity Map
Figure 7**

San Diego River Wetland Creation Project

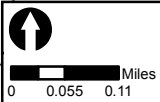
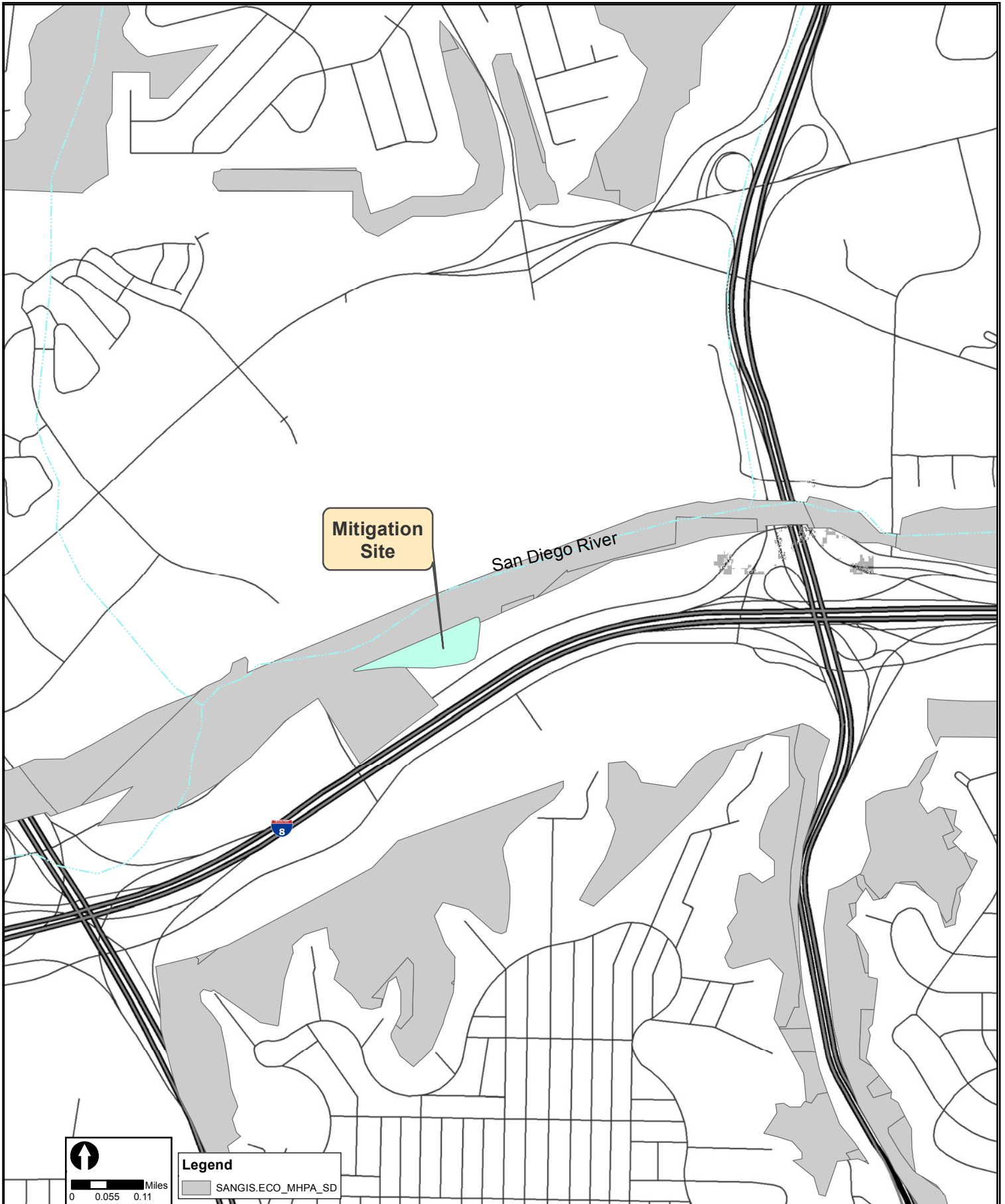
The San Diego River Wetland Creation Project is located on a Public Utilities owned parcel located immediately adjacent to the San Diego River, north of Camino Del Rio North, west of I-15, and east of Mission Center Parkway in the Mission Valley Community of the City of San Diego (Figure 8).

The site includes the creation of 3.43 acres of native riparian habitat and approximately 2 acres of Diegan coastal sage scrub habitat. The project site was graded in the fall of 2005 to create a basin along the southern bank of the San Diego River. The long-term maintenance, monitoring, and reporting program started June 14, 2006 and the site successfully completed 5-years of maintenance and monitoring in June of 2011. Native vegetation has established well with some wetland trees exceeding 20 feet in height. The wetland basin receives flows from the San Diego River during high water events (rainfall) which contributes nutrients and provides the necessary hydrology. Wildlife is using the site with numerous songbirds and animal tracks observed in the wetland area. Least Bell's vireo (*Vireo bellii pusillus*) were heard calling from the adjacent wetlands. A Multiple Habitat Planning Area (MHPA) boundary line adjustment was approved and finalized in 2012 which added the entire mitigation site into the MHPA.

During the most recent monitoring visit a transient trail and trash were observed along the northern edge of the site in the San Diego River. This trash will be removed following the end of the nesting season.

Mitigation Credits			
Habitat Type	Acres	Assigned	Balance
Southern Cottonwood Willow Riparian Forest	3.43	2.18	1.25





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**San Diego River Mitigation Project
 Vicinity Map
 Figure 8**

Los Peñasquitos North Wetland Creation Project

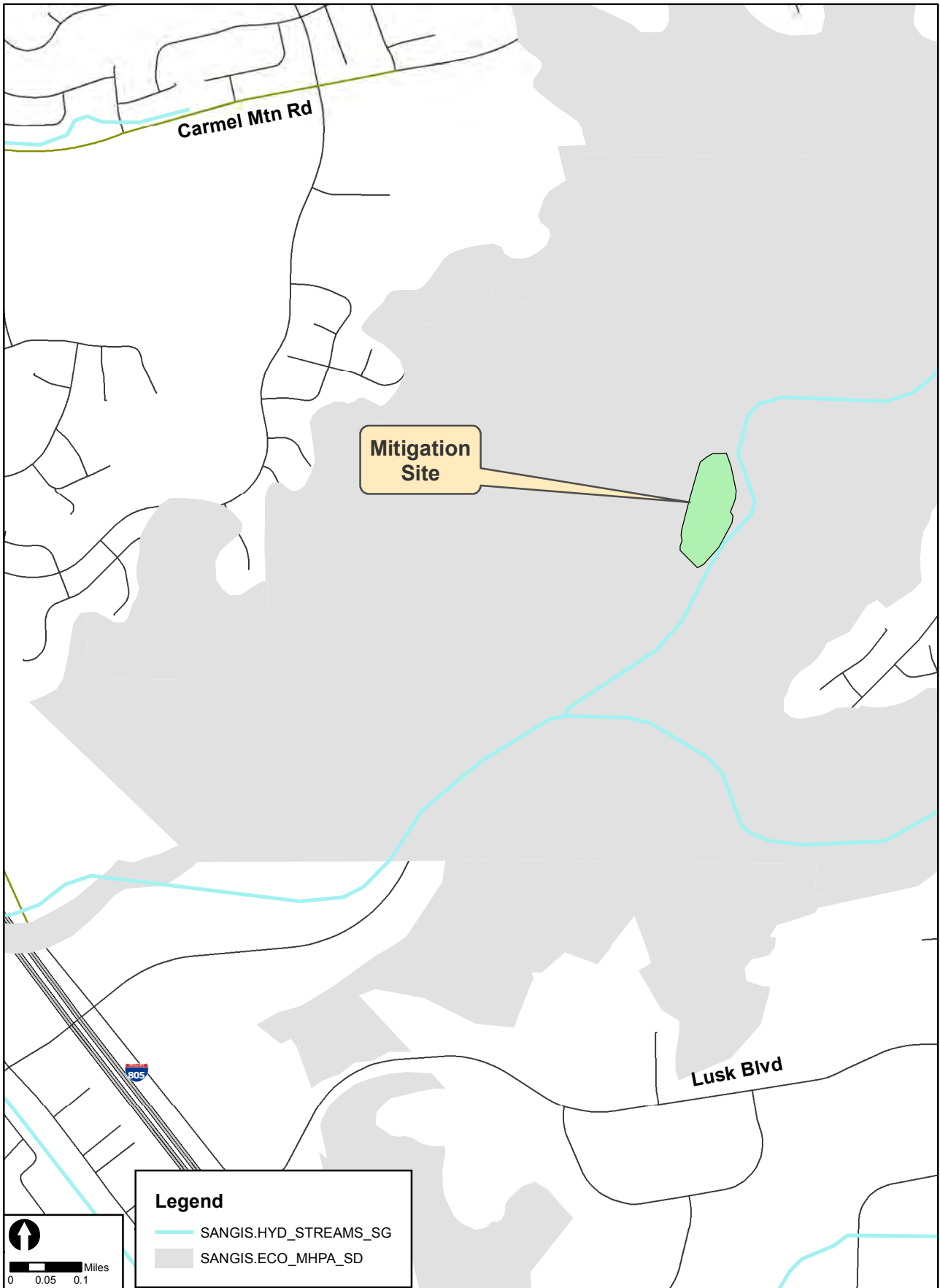
The Los Peñasquitos North Wetland Creation Project is located in the City of San Diego’s Los Peñasquitos Canyon Preserve in the community of Peñasquitos, just north of the Los Peñasquitos Creek (Figure 9).

The project includes the creation of 3.8 acres of wetland habitat, including 3.15 acres of southern willow scrub, 0.43 acres of cottonwood/sycamore woodland, and 0.22 acres of freshwater marsh. The site also includes one acre of Diegan coastal sage scrub habitat to serve as a buffer on the north edge of the site. Regulatory sign-off and approval for the project was received in the spring of 2012.

The site was assessed in May 2014 and appeared in good condition. Some willow die back was observed and can be expected in drought conditions. The site has trended towards lower growing marsh with continued deer (*Odocoileus* spp.) grazing keeping willow heights low. No trash or debris or unauthorized trails were observed onsite. A few pampas grass individuals were observed but have been treated with herbicide. The site meets the 5th year success standard with over 90% target vegetative cover. Vegetation within the wetland habitat is predominately spiny rush (*Juncus acutus*), deer grass (*Muhlenbergia rigens*) and various species of willows.

Mitigation Credits			
Habitat Type	Acres	Assigned	Balance
Riparian Scrub/Riparian Woodland/Freshwater Marsh	3.8	3.6	0.2
Diegan Coastal Sage Scrub	1.03	1.03	0





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**Los Penasquitos North Wetland Mitigation
 Vicinity Map
 Figure 9**

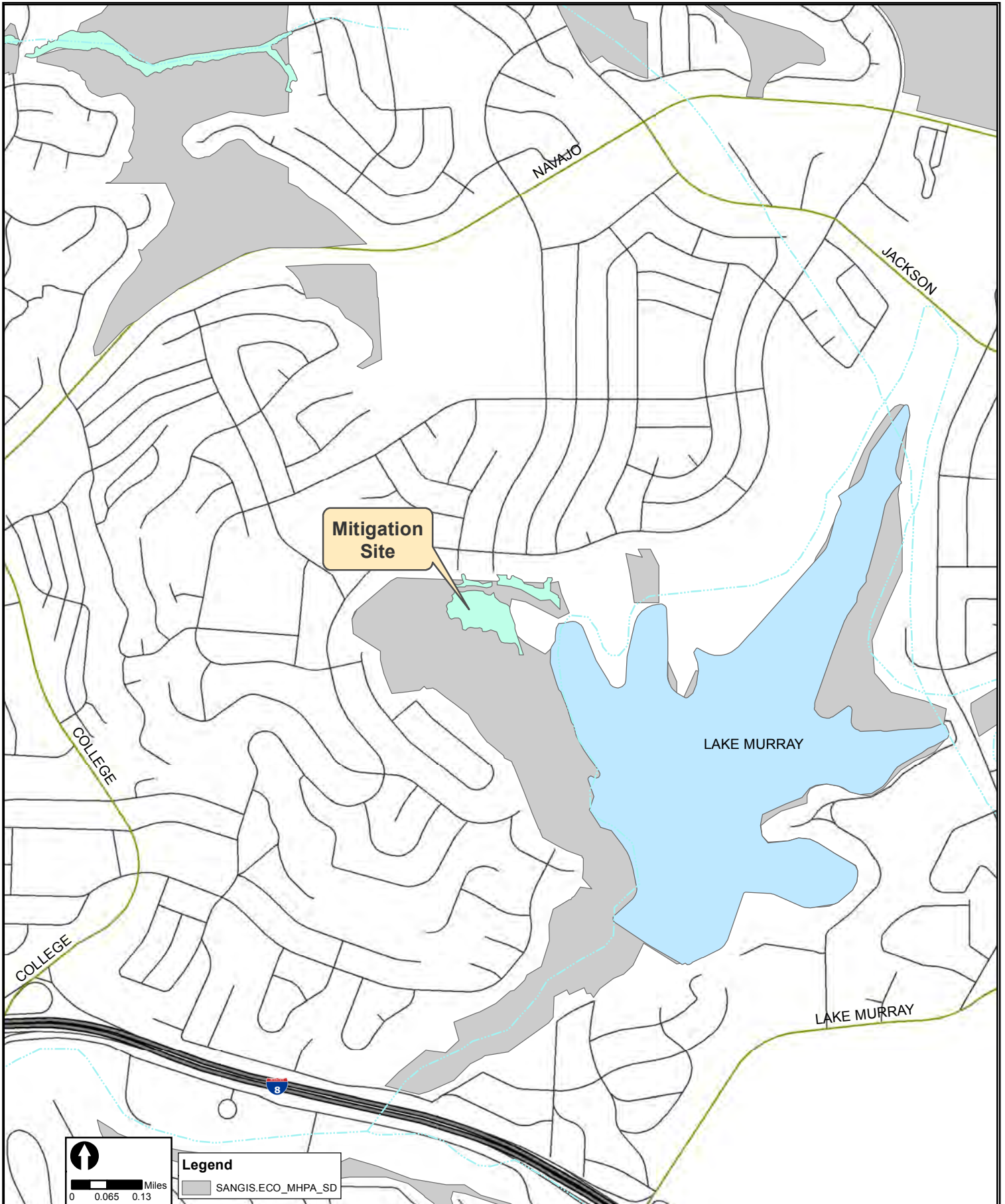
Lake Murray Mitigation Project

The Lake Murray Mitigation Project is in the City of San Diego’s Mission Trails Regional Park. It is located in the area just west of Lake Murray in the Del Cerro neighborhood of the Navajo Community (Figure 10). The mitigation site includes 2.5 acres of wetland enhancement (southern willow scrub habitat) and just over 5.2 acres of upland restoration area (Diegan coastal sage scrub). Official sign-off was received from all of the regulatory agencies by December 2011.

The annual assessment survey was conducted March 25, 2014 to assess the current condition of the mitigation site. Fifth year success criteria required an average combined cover of 90% for the upland restoration and wetland enhancement areas. The wetland enhancement area exceeds 100% native cover throughout most of the defined enhancement site. The wetland over story continues to mature, increasing in density and height with species such as Fremont cottonwood (*Populus fremontii*), Western sycamore (*Platanus racemosa*), and various types of willows reaching heights of 20 to 30 feet. The understory is diverse with species such as spiny rush, spike sedge (*Carex nardina*) evening primrose (*Oenothera elata*), San Diego marsh elder, and broad-leaved cattail (*Typha latifolia*). The upland restoration site has a mixture of Diegan coastal sage scrub and non-native grasslands. Species found within the Diegan coastal sage scrub include California sagebrush, lemonade berry (*Rhus integrifolia*), flattop buckwheat (*Erigeron fasciculatum*), laurel sumac (*Malosoma laurina*), fascicled tarweed (*Hemizonia fasciculata*), coast prickly-pear (*Opuntia littoralis*), and black sage (*Salvia mellifera*). A coyote (*Canas latrans*) and numerous California ground squirrels (*Otospermophilus beecheyi*) were observed using the upland site. A number of bird species were observed within the mitigation site, including California quail (*Callipepla californica*), California towhee (*Pipilo crissalis*), spotted towhee (*Pipilo maculatus*), lesser goldfinch (*Spinus psaltria*), mourning dove (*Zenaida macroura*), common yellowthroat (*Geothlypis trichas*), yellow-rumped warbler (*Dendroica coronata*), and Bewick’s wren (*Thryomanes bewickii*).

Mitigation Credits			
Habitat Type	Acres	Assigned	Balance
Southern Willow Scrub	2.5	1.56	0.94
Diegan Coastal Sage Scrub	5.2	4.99	0.21





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**Lake Murray Mitigation Project
Vicinity Map
Figure10**

El Rancho Peñasquitos Wetland Enhancement Project

The mitigation site is located along Los Peñasquitos Canyon approximately 0.5 mile west of Black Mountain Road in the vicinity of the historically designated Johnson Taylor Adobe of Rancho de los Peñasquitos (City of San Diego HRB Site #75). The site is within the MHPA on County and City of San Diego Open Space Land.

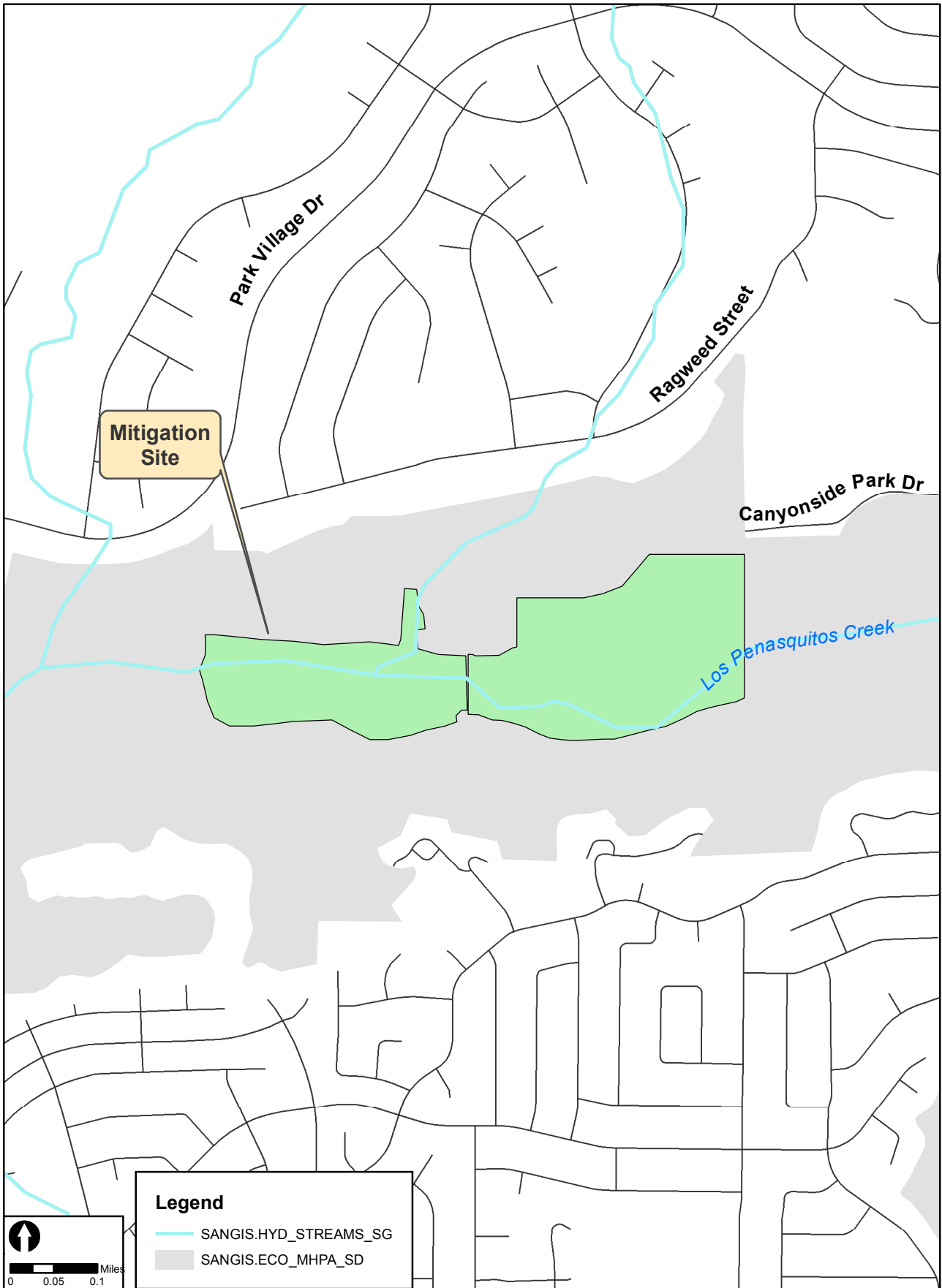
The El Rancho Project included enhancement of 5.53 acres of southern cottonwood willow riparian forest, by eradicating targeted non-native species. Project efforts began March 26, 2006 and regulatory sign-off was received in early 2010. This project treated 6,720 non-native plants, targeted species included Canary Island date palm, Mexican Fan Palm, Eucalyptus, Peruvian pepper tree (*Schinus terebinthifolius*), Brazilian pepper tree, and edible fig (*Ficus carica*).

The El Rancho Peñasquitos Wetland Enhancement Project has met the success criteria outlined in the Conceptual Mitigation Plan. During a site assessment in April 2014 a few non-native plants were observed within the project boundaries. Many of the larger treated plants have begun to deteriorate and decompose, allowing for the establishment of native species in their direct vicinity. Park and Recreation has taken over long term management of the site and manages the land consistent with the Multiple Species Conservation Plan which includes targeting the treatment or removal of invasive exotics as part of routine park management. Additional treatment of targeted species that have germinated or re-sprouted will continue.



Multiple species of birds were observed during the spring survey and included: Anna’s hummingbird (*Calypte anna*), California towhee, mourning dove, bushtit (*Psaltriparus minimus*), Nuttall’s woodpecker (*Picoides nuttallii*), black phoebe (*Sayornis nigricans*), Say’s phoebe (*Sayornis saya*), western scrub jay (*Aphelocoma coerulescens*), common raven (*Corvus corax*), red-tailed hawk (*Buteo jamaicensis*), hooded oriole (*Icterus cucullatus*), northern mocking bird (*Mimus polyglottos*), tree swallow (*Tachycineta bicolor*), and European starling (*Sturnus vulgaris*).

Mitigation Credits			
Habitat Type	Acres	Assigned	Balance
Riparian Forest	5.53	3.75	1.78



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**El Rancho Penasquitos Mitigation
 Vicinity Map
 Figure 11**

Rancho Bernardo Mitigation Project

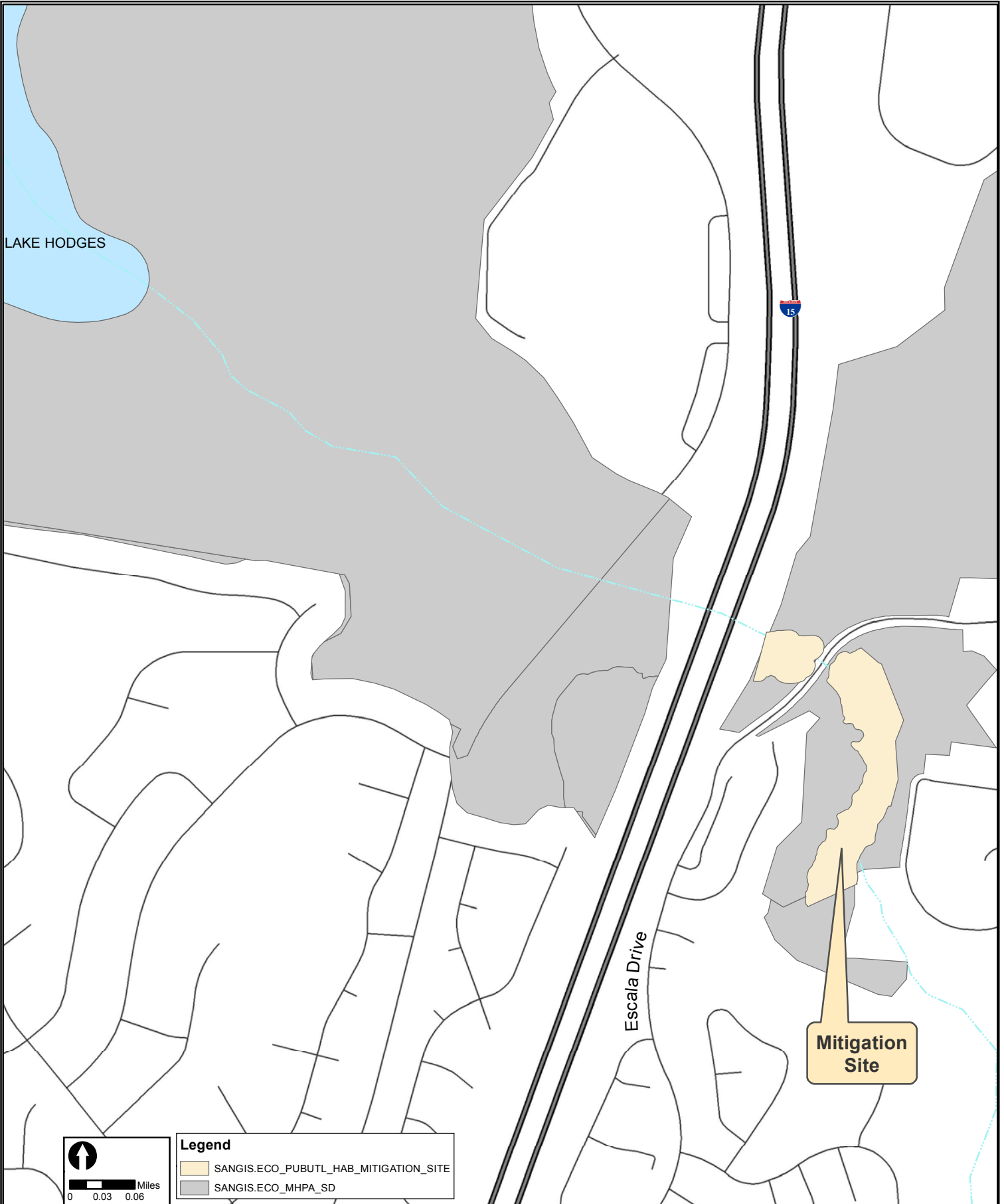
A conceptual mitigation plan has been prepared and approved by the ACOE and CDFW. The project would be located east of I-15, west of Cotorro Road and south of Escala Drive in Rancho Bernardo Canyon (Figure 12).

The project area currently supports a large area of non-native plant species that have little value for wildlife. The site currently supports California fan palms (*Washingtonia filifera*), pampas grass, castor bean (*Ricinus communis L.*), and tree tobacco (*Nicotiana glauca*). The goal of the mitigation project will be to eradicate all non-native plant species and establish native wetland habitat.

Public Utilities has postponed the implementation of this project and will reassess mitigation needs for this watershed on an annual basis. It is expected that the San Diego Association of Governments San Dieguito Wetland Mitigation Bank will be constructed and that credits will be purchased to satisfy wetland mitigation obligations for Public Utilities.



Rancho Bernardo Mitigation Project Site



Legend	
	SANGIS.ECO_PUBUTL_HAB_MITIGATION_SITE
	SANGIS.ECO_MHPA_SD

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**Rancho Bernardo Mitigation Project
Vicinity Map
Figure 12**

Otay Mesa Upland Mitigation Bank

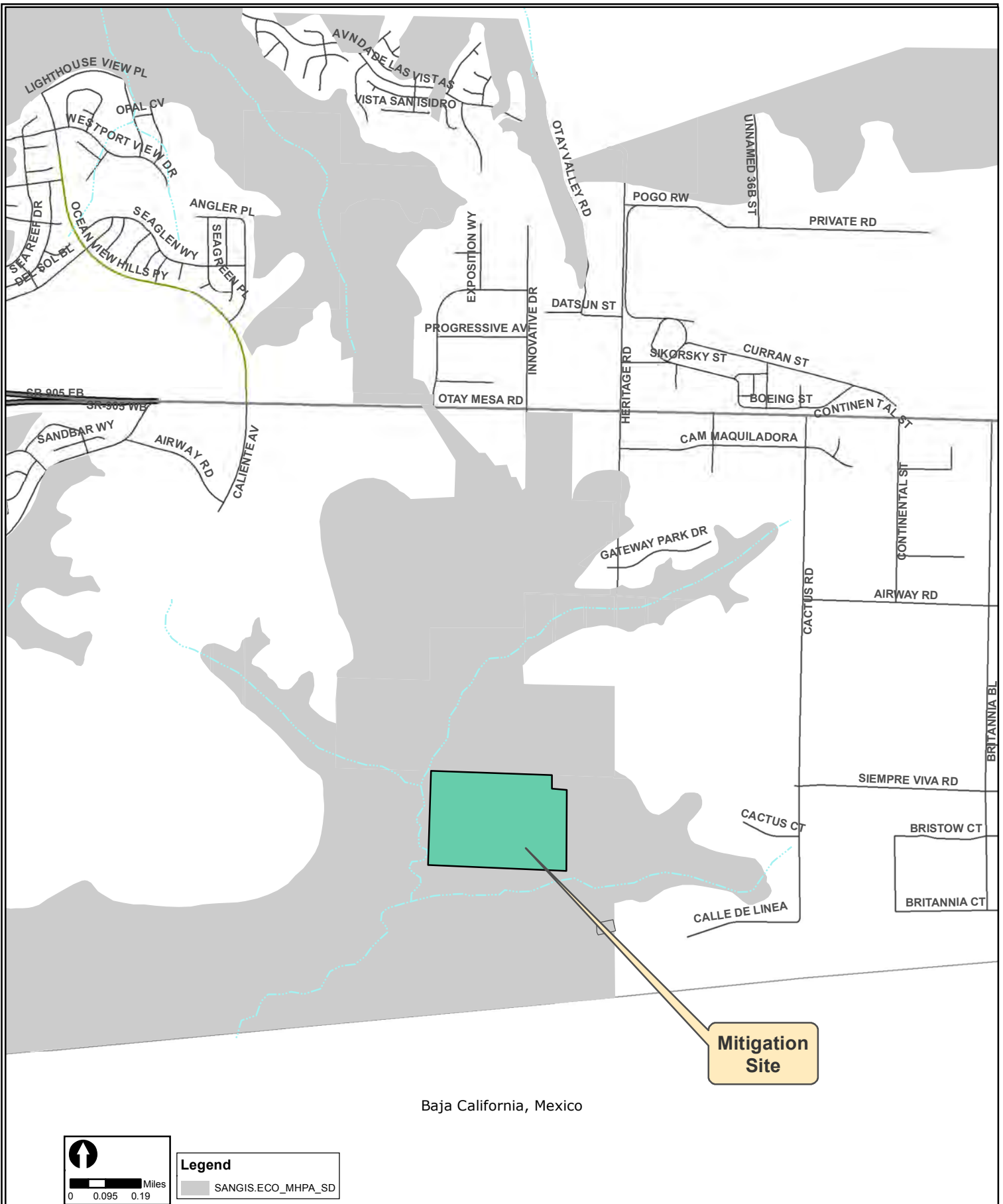
The Otay Mesa Mitigation Bank is located in the Otay Mesa community of the City of San Diego and occurs within the MHPA. The mitigation site is located on undeveloped land that is surrounded by other City of San Diego Park and Recreation Open Space lands and federal land holdings along the U.S /Mexico border. Five habitat types are found onsite and include maritime succulent scrub, non-native grasslands, ruderal, disturbed habitat, and vernal pool. Over 3,200 linear feet of fencing was installed at the site in February 2014 to reduce unauthorized off-road vehicle activity and protect sensitive habitat.

Sensitive plant species present onsite include San Diego button-celery (*Eryngium aristulatum* var. *parishii*), variegated dudleya (*Dudleya variegata*), snake cholla (*Opuntia parryi serpentina*), San Diego barrel cactus (*Ferocactus viridescens*), San Diego bur-sage (*Ambrosia chenopodiifolia*), south coast saltbush (*Atriplex pacifica*), and San Diego county viguiera (*Viguiera laciniata*). Notable animal species observed within the site include two pairs of coastal California gnatcatcher, burrowing owl (*Athene cunicularia*), northern harrier (*Circus cyaneus*), black tailed jackrabbit (*Lepus californicus*), orange-throated whiptail (*Aspidoscelis hyperythra*), coyotes, and bobcat (*Lynx rufus*).

Mitigation Credits			
Habitat Type	Acres	Assigned	Balance
Maritime Succulent Scrub (Tier I)	45.43	33.94	11.49



San Diego Barrel Cactus



Baja California, Mexico



Legend
 SANGIS.ECO_MHPA_SD

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**Otay Mesa Upland Mitigation Bank
 Vicinity Map
 Figure 13**

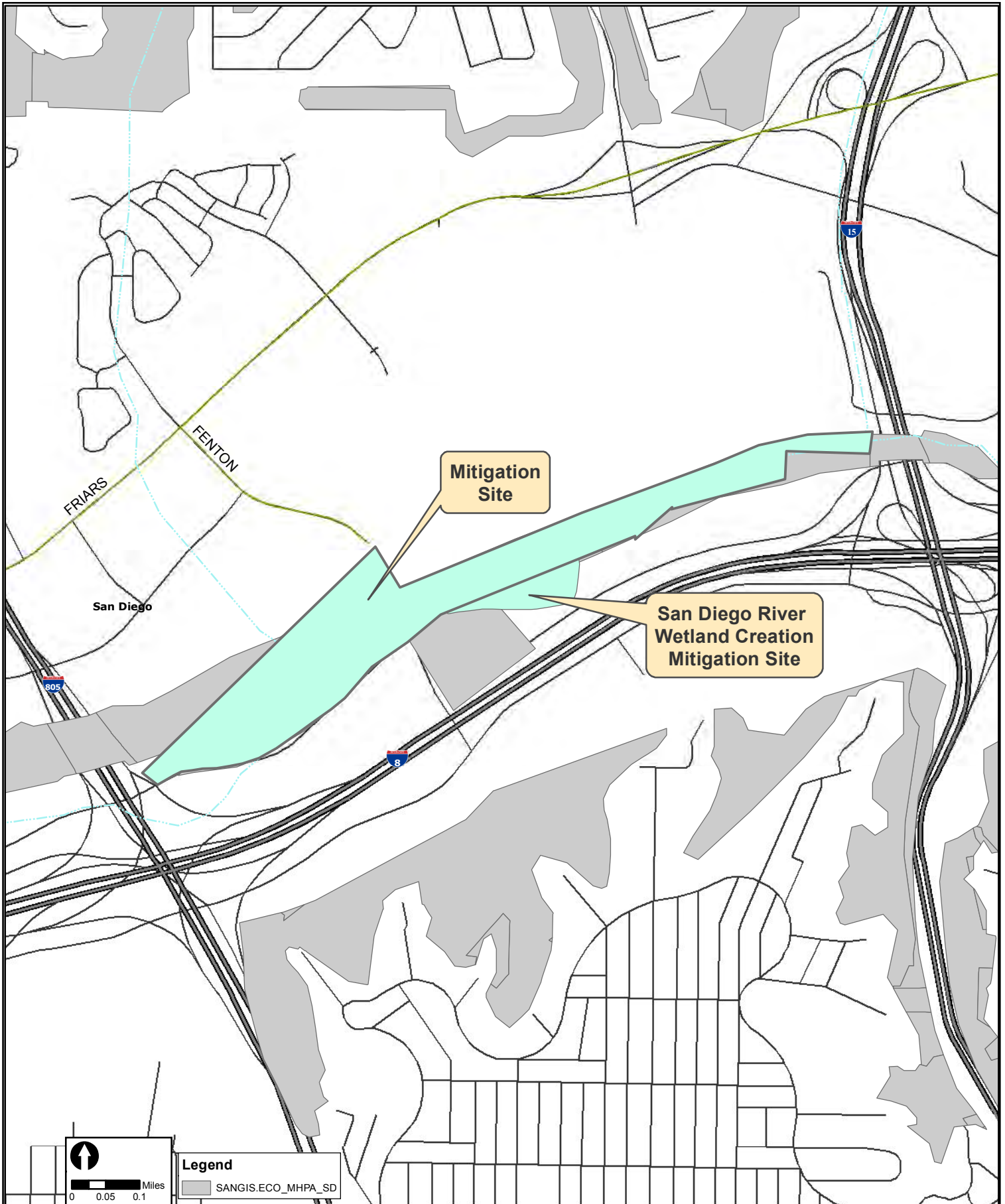
Stadium Wetland Mitigation Project

A conceptual mitigation plan has been prepared for this project and submitted to the resource agencies for their review. Pending approval by the resource agencies, work at the site is proposed to begin in the fall of 2015.

The Stadium Wetland Mitigation Project is located within the floodplain of the San Diego River between I-15 and I-805. The site is approximately 65 acres and currently dominated by a high number of non-native species including giant reed (*Arrundo donax*), Peruvian pepper tree, Brazilian pepper tree, pampas grass, Canary Island date palm, eucalyptus. This project proposes to restore native habitat to the area by removing targeted non-native species, installing native plants, and maintaining and monitoring the site for a minimum of 5-years.

This site has the potential to provide high quality habitat for a number of regionally sensitive species including least Bell's Vireo, southwestern willow flycatcher (*Empidonax traillii extimus*), western pond turtle (*Actinemys marmorata*), yellow billed cuckoo (*Coccyzus americanus*), and two-striped garter snake (*Thamnophis hammondi*), and also improve water quality, and functionality of the San Diego River.





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**Stadium Wetland Mitigation Project
Vicinity Map
Figure 14**

ATTACHMENT A –
25 MONTH REVEGETATION AND RESTORATION PROJECTS STATUS TABLE




**Canyon Restoration/Revegetation Projects (2010-2014)
July 2014**



Active Projects								
Canyon/Project	Reveg or Restoration*	Size (acre)	Start of 25 Months	Seeding Date	Planting Date	End of 25 Months	PM	Status
Mission Center Canyon	Restoration	0.22	4/29/2011	10/1/2011	N/A	5/29/2014	Tran	Additional maintenance being conducted – new completion date is 10/2014
Euclid and Menlo Restoration	Restoration	0.20	11/16/2011	9/10/2011	11/17/2011	12/16/2013	Smith	Additional maintenance was conducted. Site met success standards; requesting sign-off
Lakeside Ave Emergency (Water)	Revegetation	0.30	4/15/2012	4/9/2012	06/14/2012	07/14/2014	Paver	In 25 Month Maintenance
Alta View Water Emergency (Water)	Restoration	0.04	7/13/2012	7/13/2012	N/A	08/13/2014	Adleberg	25 months Monitoring
Buchanan Canyon MH 31	Revegetation	0.03	9/2012	9/7/2012	N/A	10/2014	Adleberg	25 months Monitoring
Imperial and Woodman	Revegetation	0.05	9/2012	N/A	N/A	10/2014	Adleberg	25 months Monitoring
Casita Way Sewer Repairs	Restoration	<0.01	11/4/2012	11/14/2012	N/A	12/14/2014	Smith	25 Month Monitoring
Mission Ave Spot Repair	Revegetation	0.01	11/21/2012	11/21/2012	N/A	12/21/2014	Adleberg	25 Month Monitoring
Manzanita/Lex Water Break (Water)	Restoration	0.10	11/29/2012	8/22/2012	11/29/2012	12/29/2014	Paver	25 Months Maintenance by D&D
Manzanita Sewer Emergency	Revegetation	0.02	11/29/2012	8/22/2012	N/A	12/29/2014	Paver	25 Month Monitoring
Middle Rose MH 160 and Lower MH9	Restoration	0.04	12/5/2012	11/30/2012	12/5/2012	1/5/2015	Van Every	Planted and maintained by Merkel. In 25 month maintenance period.
Stevenson MH 257 Emergency	Revegetation	0.08	12/6/2012	12/6/2012	N/A	1/6/2015	Paver	25 Month Monitoring
Fay Ave/Draper Street	Revegetation	<0.01	6/1/2013	N/A	N/A	7/1/2015	Adleberg	25 Month Monitoring
Ocean Blvd	Restoration	0.01	2/15/2013	N/A	N/A	3/15/2015	Paver	25 Month Monitoring
Wellington Spot Repairs	Revegetation	<0.01	10/14/2013	N/A	N/A	11/14/2015	Paver	25 Month Monitoring
Mission Gorge Pipe Protection	Restoration	0.07	11/1/2013	N/A	N/A	12/1/2015	Balo	25 Month Monitoring
Otay Pipe Protection	Restoration	0.29	11/2013	11/2013	N/A	11/2015	Lavan	25 month monitoring period
Famosa Slough Pipe Repair	Revegetation	<0.01	11/15/2013	N/A	N/A	12/15/2015	Paver	25 Month Monitoring
Spruce Mh 220 Emergency	Revegetation	<0.01	11/25/2013	1/11/2014	N/A	12/25/2015	Paver	25 Month Monitoring
Rancho Mission LT Streambed	Reveg/Rest	0.21	3/2014	3/19/2014	TBD	4/2016	VanEvery	Construction Complete, hydroseeding pending
Hawk Street Slope Repair (Water)	Revegetation	0.06	1/24/2014	2/20/2014	N/A	3/2016	Smith	25 Month Monitoring
Buchanan Emergency	Reveg/Rest	0.8	TBD	2/2014	TBD	TBD	Adleberg	Hydroseeding Complete. Plant in Fall 2014
PS 77 Force Main Inspection	Restoration	0.387	2/15/2014	10/23/2013	N/A	3/15/2016	Smith	25 Month Maintenance and Monitoring
36 inch Water Pipe Repair Blck Mtn (Water)	Reveg	0.14	5/13/2014	5/13/2014	N/A	6/13/2016	Paver	Construction Complete. Seeding TBD
Manzanita Water Break II (Water)	Restoration	0.05	6/19/2014	7/8/2014	6/19/2014	7/19/2016	Paver	25 Month Monitoring
Washington Creek Path Maint	Revegetation	0.037	5/27/2014	N/A	N/A	6/27/2016	Lavan	25 Month Monitoring

Completed Projects				
Canyon/Project	Revegetation or Restoration	Project Initiation	Project Completion	PM
Rose (MH 476)	Revegetation/Restoration	11/2008	6/28/2014	Paver
Rose Sinkhole	Revegetation/Restoration	5/23/2011	6/28/2014	Paver
Hotel Circle South Emergency	Restoration	11/9/2011	6/28/2014	Paver
Chollas YMCA	Revegetation	1/18/2012	6/28/2014	Paver
Keighley Street	Revegetation	12/9/2011	2/2014	Balo
Nobel Drive Sewer Repair	Restoration	2/25/2013	2/2014	Paver
Lexington Water Emer (Water)	Restoration	1/2011	1/2014	Balo
Dulzura Flume (Water)	Restoration	9/10/2013	1/2014	Balo
Upas Street	Revegetation	9/29/2011	1/2014	Smith
Dwane and Elaine	Restoration	6/29/2011	9/2013	Smith
Admiral Baker	Revegetation	7/21/2011	9/2013	Balo
East Tecolote	Restoration	11/24/2010	7/2013	White
Carmel Valley Rd (Water)	Revegetation	5/20/2011	7/2013	Balo
Central Tecolote MH 159	Revegetation	5/9/2011	7/2013	Balo
Plaza Ridge (Water)	Revegetation	1/19/2011	5/2013	Smith
33 rd and Maple	Revegetation	3/16/2011	5/2013	Smith
Lake Murray (Water)	Restoration	1/2011	3/2013	Balo
San Clemente Emergency	Revegetation	1/2011	3/2013	Balo
San Clemente MH 4 Access	Revegetation	2/2011	3/2013	Balo
Menlo and Redwood	Restoration	11/2010	3/2013	Smith
Rancho Mission Slope	Restoration	6/10/2010	10/2012	Balo
Lake Hodges	Restoration	7/1/2010	10/2012	Domasco
Oklahoma Street	Restoration	5/3/2010	8/2012	Domasco
Lopez MH 102	Restoration	5/2010	8/2012	Domasco
Valeta Street	Revegetation	5/3/2010	8/2012	Santos
PS 30	Restoration	4/20/2010	5/20/2012	Van Every
South Juniper	Reveg/Rest	11/2009	2/9/2012	Domasco
Tecolote MH 346	Restoration	9/2009	11/2011	Domasco
San Pasqual Pipe Repair	Erosion Control	4/5/2007	9/18/2011	Balo
7 th and Brookes	Reveg/Rest	11/2008	9/18/2011	Domasco
Washington Creek	Erosion Control	2/1/2008	4/30/2011	Balo
Switzer	Reveg/Rest	11/2008	4/30/2011	Domasco
Mt Ashmun	Reveg/Restoration	10/2009	4/30/2011	Domasco
Lexington (Jaimes Way)	Reveg/Restoration	1/2009	4/30/2011	Balo
Dakota	Reveg/Rest	9/2008	11/26/2010	Domasco
Miramar TS	Reveg/Rest	10/28/2007	9/26/2010	White
Buchanan/Maryland St	Restoration	1/15/2008	4/22/2010	White
Fairmount and Home	Reveg/Rest	5/31/05	4/22/2010	White
Norfolk	Reveg/Rest	10/19/07	4/22/2010	Balo
Juniper and 28 th	Reveg	2/15/2008	4/22/2010	Balo

ATTACHMENT B –
MITIGATION SUMMARY TABLE



Wednesday, July 23, 2014
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Mitigation Site Name	Mitigation Type	Site Size (Acres)	Acres Used	Balance (Acres)
Camino del Rio North - San Diego River Creation	Wetland Creation	3.43	2.1742	1.2558
Canyon View (Penasquitos Upland)	Upland Restoration	7.38	1.641	5.739
Central Tecolote Enhancement/Mitigation	Upland Restoration	3.05	0.717	2.333
Central Tecolote Enhancement/Mitigation	Wetland Enhancement	7.95	2.4286	5.5214
El Cuervo Norte	Wetland Creation	0.72	0.637	0.083
El Cuervo Norte	Wetland Enhancement	0.68	0.669	0.011
El Rancho (Penasquitos Enhancement)	Wetland Enhancement	5.53	3.7548	1.7752
Lake Murray	Wetland Enhancement	2.5	1.5624	0.9376
Lake Murray	Upland Restoration	5.2	4.9936	0.2064
Los Penasquitos North	Upland Restoration	1.03	1.03	0
Los Penasquitos North	Wetland Creation	3.8	3.5974	0.2026
Marron Valley Cornerstone Lands Conservation Ba	Upland Bank	7.545	6.883	0.662
Otay Mesa Mitigation Bank	Upland Bank	13.24	1.754	11.486
Penasquitos Eucalyptus Removal	Wetland Enhancement	0.31	0.31	0
Rancho Mission Enhancement	Wetland Enhancement	8.74	2.1326	6.6074
Rose Canyon Wetland and Upland	Wetland Enhancement	0.61	0.35	0.26
Rose Canyon Wetland and Upland	Upland Restoration	5.03	3.148	1.882
Rose Canyon Wetland and Upland	Wetland Creation	5.05	3.4398	1.6102
San Clemente Wetland and Upland	Wetland Creation	2.86	2.064	0.796
San Clemente Wetland and Upland	Upland Restoration	2.81	2.088	0.722
Tecolote - Tree of Heaven removal	Wetland Enhancement	0.25	0.25	0
Tecolote Canyon Wetland and Upland	Wetland Creation	1.61	1.396	0.214
Tecolote Canyon Wetland and Upland	Upland Restoration	3.37	3.3548	0.0152
TOTALS		92.695	50.3752	42.3198

Page 1 of 1

ATTACHMENT C –
MITIGATION ASSIGNMENT SUMMARY TABLE



Camino del Rio North - San Diego River Creation

Impact Project	Mitigation Type	Habitat Type	Acreage	Location	Impact Date
wetland					
15 West and Elanus	Wetland Creation	SWS	0.05	Off-site in watershed	12/19/2003
32nd Street - Huckleberry LT	Wetland Creation	DWET	0.04	Off-site out of watershed	1/1/2010
32nd Street - Huckleberry LT	Wetland Creation	NVC	0.009	Off-site out of watershed	1/1/2010
54th & Maisel	Wetland Creation	FM	0.008	Off-site in watershed	7/2/2001
60th Street Pipe Relocation/Permanent Access	Wetland Creation	DWET	0.005	Off-site in watershed	
Alvarado Court Emergency Sewer Repair	Wetland Creation	SWS	0.016	Off-site in watershed	10/5/1998
Alvarado Court Emergency Sewer Repair	Wetland Creation	FM	0.08	Off-site in watershed	10/5/1998
Alvarado Court Sewer Crossing	Wetland Creation	NVC	0.002	Off-site in watershed	
Alvarado Court Sewer Crossing	Wetland Creation	SWS	0.005	Off-site in watershed	
Alvarado LT	Wetland Creation	MFS	0.01	Off-site in watershed	
Alvarado LT	Wetland Creation	DWET	0.01	Off-site in watershed	
Alvarado Trunk Sewer	Wetland Creation	DWET	0.022	Off-site in watershed	
Buchanan	Wetland Creation	SWS	0.0108	Off-site in watershed	3/11/2002
Buchanan	Wetland Creation	DWET	0.322	Off-site in watershed	3/11/2002
Buchanan Group Job 689	Wetland Creation	NVC	0.009	Off-site in watershed	
Buchanan LT	Wetland Creation	DWET	0.06	Off-site in watershed	1/1/2004
Buchanan Sewer Blockage Emergency	Wetland Creation	SWS	0.011	Off-site in watershed	12/2/2013
Chocolate Access MH 273 to 267	Wetland Creation	EW	0.0064	Off-site out of watershed	
Chollas Dam Vegetation Removal	Wetland Creation	FM	0.022	Off-site out of watershed	1/22/2013
Chollas Exposed Water Main Repair	Wetland Creation	RS	0.014	Off-site out of watershed	8/30/2011

Camino del Rio North - San Diego River Creation

Impact Project	Mitigation Type	Habitat Type	Acreage	Location	Impact Date
Dove Canyon Emergency Repair	Wetland Creation	NVC	0.001	Off-site in watershed	10/22/2010
Elanus & Murray Canyons (I-15 & Clairemont Mesa Bl	Wetland Creation	SWS	0.007	Off-site in watershed	12/11/2002
Elanus (I-15 & Clairemont Mesa Blvd) LT	Wetland Creation	EW	0.005	Off-site in watershed	
Euclid & Menlo (3343 Menlo Ave Spalsh Apron	Wetland Creation	NVC	0.004	Off-site out of watershed	3/8/2004
Euclid & Menlo (47th & Thorn Sewer Maint & Emerg)	Wetland Creation	DWET	0.08	Off-site out of watershed	2/1/2004
Federal & Chollas	Wetland Creation	DWET	0.0008	Off-site out of watershed	10/22/2002
Fox Canyon (University & 49th) Emergency Repair	Wetland Creation	NVC	0.002	Off-site out of watershed	10/29/2007
Hopkins	Wetland Creation	DWET	0.02	Off-site out of watershed	3/17/2004
Hopkins (Calle Abajo Emergency)	Wetland Creation	NVC	0.002	Off-site out of watershed	4/3/2002
Huckleberry (32nd St Canyon Emergency Maintenance)	Wetland Creation	DWET	0.04	Off-site out of watershed	7/21/2003
I-15 & Adams	Wetland Creation	EW	0.004	Off-site in watershed	5/6/2004
Junipero Serra (Jackson/Mission Gorge Emergency)	Wetland Creation	SWS	0.01	Off-site in watershed	11/13/2002
Junipero Serra (Mission Gorge Emergency Repair)	Wetland Creation	SWS	0.03	Off-site in watershed	12/11/2001
Junipero Serra (Superior Ready Mix Emergency Repai	Wetland Creation	SWS	0.3	Off-site in watershed	1/26/2002
Junipero Serra (Superior Ready Mix Emergency Repai	Wetland Creation	SCWRF	0.09	Off-site in watershed	1/26/2002
Lake Murray Emergency Cleaning	Wetland Creation	SWS	0.01	Off-site in watershed	12/1/2002
Lake Murray Trunk Sewer and Permanent Access Path	Wetland Creation	FM	0.07	Off-site in watershed	
Lake Murray Trunk Sewer and Permanent Access Path	Wetland Creation	SWS	0.2	Off-site in watershed	
Lexington Long-Term Access	Wetland Creation	NVC	0.08	Off-site out of watershed	
Market & Euclid (MH 88 Repair at Encanto Creek)	Wetland Creation	SWS	0.003	Off-site out of watershed	10/22/2009
Mission Center Canyon B	Wetland Creation	NVC	0.035	Off-site in watershed	1/1/2011
Mission Center Canyon B	Wetland Creation	EW	0.02	Off-site in watershed	1/1/2011
Mission Center Canyon B	Wetland Creation	DWET	0.014	Off-site in watershed	1/1/2011
Mission Center Canyon B	Wetland Creation	RS	0.025	Off-site in watershed	1/1/2011

Camino del Rio North - San Diego River Creation

Impact Project	Mitigation Type	Habitat Type	Acreage	Location	Impact Date
Mission Center Canyon Emergency Sewer Repair	Wetland Creation	FM	0.023	Off-site in watershed	3/10/2010
Mission Center Canyon Emergency Sewer Repair	Wetland Creation	SWS	0.004	Off-site in watershed	3/10/2010
Mission Center Rd. (Kearny Mesa)	Wetland Creation	SWS	0.007	Off-site in watershed	1/13/2002
Murphy Canyon TS Access and Repair	Wetland Creation	FM	0.051	Off-site in watershed	
Norfolk (Fairmont & Montezuma)	Wetland Creation	SWS	0.003	Off-site in watershed	4/22/2002
Norfolk LT	Wetland Creation	NVC	0.005	Off-site in watershed	7/1/2004
Otay Valley TS Pipe Protection	Wetland Creation	NVC	0.018	Off-site out of watershed	9/16/2013
Presidio (Palm Cyn) GJ665	Wetland Creation	NVC	0.0137	Off-site in watershed	
Presidio (Palm Cyn) GJ665	Wetland Creation	RS	0.165	Off-site in watershed	
Rancho Mission (Mission Gorge Canyon, Conestoga Co	Wetland Creation	DWET	0.005	Off-site in watershed	2/7/2002
Rancho Mission LT	Wetland Creation	SWS	0.007	Off-site in watershed	11/12/2013
Rancho Mission LT	Wetland Creation	NVC	0.007	Off-site in watershed	11/12/2013
San Diego Mission Rd Emergency	Wetland Creation	SWS	0.01	Off-site in watershed	7/9/2011
San Diego Mission Rd Emergency	Wetland Creation	FM	0.01	Off-site in watershed	7/9/2011
Shepherd	Wetland Creation	SWS	0.01	Off-site in watershed	2/1/2003
Shepherd LT	Wetland Creation	RS	0.02	Off-site in watershed	
Shepherd LT	Wetland Creation	DWET	0.015	Off-site in watershed	
Shepherd LT	Wetland Creation	RW	0.03	Off-site in watershed	
South Chollas LTA	Wetland Creation	MFS	0.0015	Off-site out of watershed	
Valencia Canyon Emergency Repair & Maintenance	Wetland Creation	MFS	0.004	Off-site out of watershed	1/25/2003
Total Mitigation Acres:			2.1742 acres		

Canyon View (Penasquitos Upland)

Impact Project	Mitigation Type	Habitat Type	Acreage	Location	Impact Date
upland					

Canyon View (Penasquitos Upland)

Impact Project	Mitigation Type	Habitat Type	Acreage	Location	Impact Date
Black Mtn Access Rd Repair	Upland Restoration	DCSS	0.19	In-canyon	
Lopez Canyon LT	Upland Restoration	NNG	0.013	In-canyon	
Lopez Canyon LT	Upland Restoration	DCSS	0.3	In-canyon	
Lopez Emergency Cleaning	Upland Restoration	NNG	0.05	In-canyon	2/13/2005
Lopez Emergency Cleaning	Upland Restoration	SOC	0.02	In-canyon	2/13/2005
Lopez Emergency Cleaning	Upland Restoration	SMC	0.01	In-canyon	2/13/2005
Lopez Emergency Cleaning	Upland Restoration	DCSS	0.51	In-canyon	2/13/2005
Lopez MH 102 Emergency	Upland Restoration	DCSS	0.022	In-canyon	12/18/2009
Penasquitos Lagoon Mh 190 Access	Upland Restoration	DCSS	0.006	Off-site in watershed	11/20/2013
Penasquitos Views Trunk Sewer	Upland Restoration	DCSS	0.52	In-canyon	
Total Mitigation Acres:			1.641 acres		

Central Tecolote Enhancement/Mitigation

Impact Project	Mitigation Type	Habitat Type	Acreage	Location	Impact Date
upland					
East Tecolote Canyon Pipe Encasemt Protection Proj	Upland Restoration	NNG	0.02	In-canyon	10/4/2010
East Tecolote Canyon Pipe Encasemt Protection Proj	Upland Restoration	NG	0.002	In-canyon	10/4/2010
East Tecolote Canyon Pipe Encasemt Protection Proj	Upland Restoration	CLOW	0.022	In-canyon	10/4/2010
Tecolote LT	Upland Restoration	MSS	0.02	In-canyon	
Tecolote LT	Upland Restoration	CLOW	0.06	In-canyon	
Tecolote LT	Upland Restoration	POS	0.09	In-canyon	
Tecolote LT	Upland Restoration	DCSS	0.453	In-canyon	
Tecolote LT	Upland Restoration	SMC	0.05	In-canyon	
Tecolote LT	Upland Restoration	SOC	0	In-canyon	
Total Mitigation Acres:			0.717 acres		

Central Tecolote Enhancement/Mitigation

Impact Project	Mitigation Type	Habitat Type	Acreage	Location	Impact Date
wetland					
East Tecolote (East Clairemont)	Wetland Enhancement	SWS	0.0001	In-canyon	1/8/2002
East Tecolote (East Clairemont)	Wetland Enhancement	SRF	0.008	In-canyon	1/8/2002
East Tecolote (East Clairemont) LT	Wetland Enhancement	FM	0.014	In-canyon	
East Tecolote (East Clairemont) LT	Wetland Enhancement	SRF	0.458	In-canyon	
East Tecolote (East Clairemont) LT	Wetland Enhancement	SWS	0.039	In-canyon	
East Tecolote Canyon Pipe Encasemt Protection Proj	Wetland Enhancement	SRF	0.06	In-canyon	10/4/2010
East Tecolote Canyon Pipe Encasemt Protection Proj	Wetland Enhancement	SWS	0.036	In-canyon	10/4/2010
East Tecolote Canyon Pipe Encasemt Protection Proj	Wetland Enhancement	OW	0.023	In-canyon	10/4/2010
East Tecolote Emergency MH 218	Wetland Enhancement	SRF	0.096	In-canyon	2/8/2010
East Tecolote Manholes 223 and 224 Emergency	Wetland Enhancement	OW	0.015	In-canyon	12/16/2009
East Tecolote Manholes 223 and 224 Emergency	Wetland Enhancement	FM	0.039	In-canyon	12/16/2009
East Tecolote Manholes 223 and 224 Emergency	Wetland Enhancement	SWS	0.033	In-canyon	12/16/2009
East Tecolote Manholes 223 and 224 Emergency	Wetland Enhancement	SRF	0.068	In-canyon	12/16/2009
Park Mesa Way	Wetland Enhancement	SWS	0.15	In-canyon	1/13/2000
Tecolote (including Mt. Elbrus)	Wetland Enhancement	SWS	0.13	In-canyon	11/18/2002
Tecolote (including Mt. Elbrus)	Wetland Enhancement	SCLORF	0.4	In-canyon	11/18/2002
Tecolote Emergency Pipe Repair (Crossing)	Wetland Enhancement	EW	0.002	In-canyon	12/13/2004
Tecolote Emergency Pipe Repair (Crossing)	Wetland Enhancement	SWS	0.008	In-canyon	12/13/2004
Tecolote Emergency Pipe Repair (Crossing)	Wetland Enhancement	SCLORF	0.004	In-canyon	12/13/2004
Tecolote LT	Wetland Enhancement	SWS	0.03	In-canyon	
Tecolote LT	Wetland Enhancement	MFS	0.01	In-canyon	
Tecolote LT	Wetland Enhancement	NVC	0.02	In-canyon	
Tecolote LT	Wetland Enhancement	SRF	0.682	In-canyon	

Central Tecolote Enhancement/Mitigation

Impact Project	Mitigation Type	Habitat Type	Acreage	Location	Impact Date
Tecolote MH 101 Emergency	Wetland Enhancement	MFS	0.0005	In-canyon	4/5/2010
Tecolote Mt. Ashmun Pipe Protection Emergency	Wetland Enhancement	NVC	0.001	In-canyon	1/17/2008
Tecolote Mt. Ashmun Pipe Protection Emergency	Wetland Enhancement	NVC	0.007	In-canyon	1/17/2008
Tecolote Mt. Ashmun Pipe Protection Emergency	Wetland Enhancement	RF	0.02	In-canyon	1/17/2008
Tecolote Mt. Ashmun Pipe Protection Erosion Contro	Wetland Enhancement	SWS	0.001	In-canyon	9/9/2009
Tecolote Mt. Ashmun Pipe Protection Erosion Contro	Wetland Enhancement	RF	0.004	In-canyon	9/9/2009
Tecolote Pipe Repair Near Manhole 346	Wetland Enhancement	SRF	0.07	In-canyon	8/17/2009
Total Mitigation Acres:			2.4286 acres		

El Cuervo Norte

Impact Project	Mitigation Type	Habitat Type	Acreage	Location	Impact Date
wetland					
Acuna	Wetland Creation	SWS	0.08	Off-site in watershed	3/11/2002
Acuna	Wetland Creation	MFS	0.002	Off-site in watershed	3/11/2002
Acuna	Wetland Enhancement	SWS	0.08	Off-site in watershed	3/11/2002
Acuna	Wetland Enhancement	MFS	0.002	Off-site in watershed	3/11/2002
Acuna	Wetland Creation	DWET	0.04	Off-site in watershed	3/11/2002
Acuna	Wetland Enhancement	DWET	0.04	Off-site in watershed	3/11/2002
Acuna Street Emergency	Wetland Enhancement	SWS	0.04	Off-site in watershed	7/6/1998
Acuna Street Emergency	Wetland Creation	SWS	0.04	Off-site in watershed	7/6/1998
Penasquitos Bluffs (Finger Canyon Emergency)	Wetland Enhancement	CVFM	0.06	In-canyon	11/1/2000
Penasquitos Bluffs (Finger Canyon Emergency)	Wetland Creation	CVFM	0.06	Off-site in watershed	11/1/2000
Penasquitos Bluffs (Finger Canyon Emergency)	Wetland Enhancement	SWS	0.02	In-canyon	11/1/2000
Penasquitos Bluffs (Finger Canyon Emergency)	Wetland Creation	SWS	0.02	Off-site in watershed	11/1/2000
San Clemente (Emergency Repairs Combined)	Wetland Enhancement	RW	0.104	Off-site in watershed	9/1/2001

El Cuervo Norte

Impact Project	Mitigation Type	Habitat Type	Acreage	Location	Impact Date
San Clemente (Emergency Repairs Combined)	Wetland Creation	MFS	0.02	Off-site in watershed	9/1/2001
San Clemente (Emergency Repairs Combined)	Wetland Enhancement	SWS	0.003	Off-site in watershed	9/1/2001
San Clemente (Emergency Repairs Combined)	Wetland Enhancement	MFS	0.02	Off-site in watershed	9/1/2001
San Clemente (Emergency Repairs Combined)	Wetland Creation	RW	0.052	Off-site in watershed	9/1/2001
San Clemente (Emergency Repairs Combined)	Wetland Creation	SWS	0.003	Off-site in watershed	9/1/2001
Stevenson	Wetland Creation	MFS	0.02	Off-site in watershed	8/8/2001
Stevenson	Wetland Enhancement	MFS	0.02	Off-site in watershed	8/8/2001
Stevenson	Wetland Enhancement	SWS	0.28	Off-site in watershed	8/8/2001
Stevenson	Wetland Creation	SWS	0.28	Off-site in watershed	8/8/2001
Torreyana Sewer Repair	Wetland Creation	NVC	0.02	Off-site in watershed	10/1/2001
Total Mitigation Acres:			1.306 acres		

El Rancho (Penasquitos Enhancement)

Impact Project	Mitigation Type	Habitat Type	Acreage	Location	Impact Date
wetland					
Acuna LT	Wetland Enhancement	DWET	0.01	Off-site in watershed	2/1/2005
Balboa Terrace Trunk Sewer Replacement	Wetland Enhancement	MFS	0.022	Off-site in watershed	9/16/2012
Balboa Terrace Trunk Sewer Replacement	Wetland Enhancement	SWS	0.064	Off-site in watershed	9/16/2012
Balboa Terrace Trunk Sewer Replacement	Wetland Enhancement	SCLORF	0.006	Off-site in watershed	9/16/2012
Balboa Terrace Trunk Sewer Replacement	Wetland Enhancement	FM	0.04	Off-site in watershed	9/16/2012
Balboa Terrace Trunk Sewer Replacement	Wetland Enhancement	DWET	0.107	Off-site in watershed	9/16/2012
Balboa Terrace Trunk Sewer Replacement	Wetland Enhancement	NVC	0.014	Off-site in watershed	9/16/2012
Black Mountain Road Finger Canyon	Wetland Enhancement	FM	0.006	In-canyon	4/4/2003
Carmel Valley Rd Emergency Water Break	Wetland Enhancement	RS	0.052	Off-site in watershed	10/22/2010
Carmel Valley Rd Emergency Water Break	Wetland Enhancement	SWS	0.016	Off-site in watershed	10/22/2010

El Rancho (Penasquitos Enhancement)

Impact Project	Mitigation Type	Habitat Type	Acreage	Location	Impact Date
Carroll and Mesa Rim	Wetland Enhancement	SCLORF	0.2	Off-site in watershed	6/2/2003
Carroll and Mesa Rim	Wetland Enhancement	SWS	0.15	Off-site in watershed	6/2/2003
Carroll Canyon Emergency Sewer Repair	Wetland Enhancement	SAWRF	0.06	Off-site in watershed	2/26/2010
Carroll Canyon Emergency Sewer Repair	Wetland Enhancement	NVC	0.04	Off-site in watershed	2/26/2010
Gesner/Huron	Wetland Enhancement	RW	0.11	Off-site in watershed	8/1/1998
I-5/SR-52 Maintenance Project	Wetland Enhancement	SWS	0.03	Off-site in watershed	
Lopez Canyon LT	Wetland Enhancement	RW	0.01	In-canyon	
Lopez Canyon LT	Wetland Enhancement	SWS	0.03	In-canyon	
Lopez Canyon LT	Wetland Enhancement	NVC	0.01	In-canyon	
Lopez Canyon LT MH 13 Access	Wetland Enhancement	AM	0.3	In-canyon	9/26/2013
Lopez Emergency Cleaning	Wetland Enhancement	MFS	0.04	In-canyon	2/13/2005
Lopez Emergency Cleaning	Wetland Enhancement	SWS	0.08	In-canyon	2/13/2005
Lopez Emergency Cleaning	Wetland Enhancement	RF	0.008	In-canyon	2/13/2005
Lopez Emergency Cleaning	Wetland Enhancement	EW	0.001	In-canyon	2/13/2005
Lower Rose Canyon Emergency Repairs (MH 15)	Wetland Enhancement	SWS	0.32	Off-site in watershed	2/8/2005
Middle Rose Cyn MH 160 Emergency	Wetland Enhancement	SWS	0.02	Off-site in watershed	11/17/2011
Monte Verde Sewer Improvements	Wetland Enhancement	SRF	0.08	Off-site in watershed	1/1/2010
Old Rose Canyon Sewer Relocation Project	Wetland Enhancement	SWS	0.04	Off-site in watershed	2/8/2011
Old Rose Canyon Sewer Relocation Project	Wetland Enhancement	MFS	0.007	Off-site in watershed	2/8/2011
Old Rose Canyon Sewer Relocation Project	Wetland Enhancement	FM	0.002	Off-site in watershed	2/8/2011
Park Mesa LT	Wetland Enhancement	SWS	0.035	Off-site in watershed	1/11/2011
Penasquitos Bluffs LT	Wetland Enhancement	FM	0.014	Off-site in watershed	
Penasquitos Bluffs LT	Wetland Enhancement	AM	0.014	Off-site in watershed	
Penasquitos Bluffs LT	Wetland Enhancement	SWS	0.01	Off-site in watershed	

El Rancho (Penasquitos Enhancement)

Impact Project	Mitigation Type	Habitat Type	Acreage	Location	Impact Date
Penasquitos Preserve (East of Black Mountain Road)	Wetland Enhancement	SCWRF	0.18	In-canyon	10/16/2003
Penasquitos Preserve LT	Wetland Enhancement	RW	0.012	In-canyon	
Penasquitos Preserve LT	Wetland Enhancement	SCLORF	0.106	In-canyon	
Penasquitos Preserve LT	Wetland Enhancement	SCWRF	0.24	In-canyon	
Penasquitos Preserve LT	Wetland Enhancement	MFS	0.032	In-canyon	
Penasquitos Preserve LT	Wetland Enhancement	FM	0.045	In-canyon	
Penasquitos Preserve LT	Wetland Enhancement	NVC	0.005	In-canyon	
Penasquitos View Emergency	Wetland Enhancement	CAM	0.002	In-canyon	8/18/2004
Rose Canyon ER Repairs between 9/01 and 5/03	Wetland Enhancement	SWS	0.03	Off-site in watershed	9/1/2001
Rose Canyon ER Repairs between 9/01 and 5/03	Wetland Enhancement	RW	0.04	Off-site in watershed	9/1/2001
Rose Canyon ER Repairs between 9/01 and 5/03	Wetland Enhancement	NVC	0.0018	Off-site in watershed	9/1/2001
Rose Canyon ER Repairs between 9/01 and 5/03	Wetland Enhancement	MFS	0.03	Off-site in watershed	9/1/2001
San Clemente Emergency Sewer Encasement Repair	Wetland Enhancement	SCLORF	0.04	Off-site in watershed	12/13/2010
Stevenson Long Term Access Project	Wetland Enhancement	MFS	0.085	Off-site in watershed	
Stevenson Long Term Access Project	Wetland Enhancement	SWS	0.028	Off-site in watershed	
Stevenson Long Term Access Project	Wetland Enhancement	NVC	0.028	Off-site in watershed	
Van Nuys Canyon Emergency Sewer Repair Project	Wetland Enhancement	NVC	0.02	Off-site in watershed	12/31/2004
Van Nuys Canyon MH # 91 Sewer Blockage	Wetland Enhancement	MFS	0.29	Off-site in watershed	12/4/1996
Van Nuys Canyon MH # 91 Sewer Blockage	Wetland Enhancement	NVC	0.13	Off-site in watershed	12/4/1996
Van Nuys Canyon MHs 113, 114 and 93	Wetland Enhancement	NVC	0.003	Off-site in watershed	12/15/2003
Van Nuys Installation of 2 36-inch Pipe Culverts	Wetland Enhancement	SWS	0.03	Off-site in watershed	2/7/2001
Van Nuys MH #114 Sewage Leak Investigation	Wetland Enhancement	NVC	0.003	Off-site in watershed	4/4/2002
Van Nuys MH #124 Sewer Leak	Wetland Enhancement	NVC	0.03	Off-site in watershed	2/10/1998
Van Nuys MH #92-76 Four Sewer Breaks (Upper Canyon	Wetland Enhancement	MFS	0.146	Off-site in watershed	8/4/2000

El Rancho (Penasquitos Enhancement)

Impact Project	Mitigation Type	Habitat Type	Acreage	Location	Impact Date
Van Nuys MH #92-76 Four Sewer Breaks (Upper Canyon	Wetland Enhancement	DWET	0.25	Off-site in watershed	8/4/2000
Total Mitigation Acres:		3.7548 acres			

Lake Murray

Impact Project	Mitigation Type	Habitat Type	Acreage	Location	Impact Date
upland					
32nd Street - Huckleberry LT	Upland Restoration	NNG	0.009	Off-site out of watershed	1/1/2010
Alvarado Court Emergency Sewer Repair	Upland Restoration	DCSS	0.29	Off-site in watershed	10/5/1998
Alvarado TS MH 459 and 458 Maintenance	Upland Restoration	DCSS	0.005	Off-site in watershed	5/1/2013
Buchanan Sewer Blockage Emergency	Upland Restoration	SMC	0.023	Off-site in watershed	12/2/2013
Buchanan Sewer Blockage Emergency	Upland Restoration	DCSS	0.032	Off-site in watershed	12/2/2013
Cardinal Drive Sewer Emergency	Upland Restoration	DCSS	0.0016	Off-site in watershed	12/14/2012
Chocolate Access MH 273 to 267	Upland Restoration	CC	0.002	Off-site out of watershed	
Florida Canyon	Upland Restoration	DCSS	0.01	Off-site out of watershed	2/28/2004
Huckleberry (32nd & Beech)	Upland Restoration	DCSS	0.009	Off-site out of watershed	7/17/2001
Huckleberry (32nd & Beech)	Upland Restoration	NNG	0.023	Off-site out of watershed	7/17/2001
Huckleberry (32nd St Canyon Emergency Maintenance)	Upland Restoration	NNG	0.03	Combination	7/21/2003
Hwy 163 (7th and Brookes 2004 Emergency Maint)	Upland Restoration	NNG	0.035	Off-site in watershed	5/28/2004
Hwy 163 Corridor (7th & Brookes 2002 Emergency Repa	Upland Restoration	NNG	0.015	Off-site in watershed	11/30/2002
Junipero Serra (Jackson/Mission Gorge Emergency)	Upland Restoration	DCSS	0.06	Off-site in watershed	11/13/2002
Lake Murray Emergency Cleaning	Upland Restoration	DCSS	0.64	In-canyon	12/1/2002
Lake Murray Emergency Cleaning	Upland Restoration	NNG	0.1	In-canyon	12/1/2002
Lake Murray Trunk Sewer and Permanent Access Path	Upland Restoration	NNG	0.05	In-canyon	
Lake Murray Trunk Sewer and Permanent Access Path	Upland Restoration	DCSS	3.32	In-canyon	
Lake Murray Trunk Sewer and Permanent Access Path	Upland Restoration	BBS	0.33	In-canyon	

Lake Murray

Impact Project	Mitigation Type	Habitat Type	Acreage	Location	Impact Date
Switzer MH 152 Access	Upland Restoration	DCSS	0.009	Off-site out of watershed	1/27/2014
Total Mitigation Acres:			4.9936 acres		
wetland					
32nd Street - Huckleberry LT	Wetland Enhancement	DWET	0.04	Off-site in watershed	1/1/2010
54th & Maisel	Wetland Enhancement	FM	0.008	Off-site in watershed	7/2/2001
60th Street Pipe Relocation/Permanent Access	Wetland Enhancement	DWET	0.005	Off-site in watershed	
Alvarado Court Emergency Sewer Repair	Wetland Enhancement	SWS	0.016	Off-site in watershed	10/5/1998
Alvarado Court Emergency Sewer Repair	Wetland Enhancement	FM	0.08	Off-site in watershed	10/5/1998
Alvarado Court Emergency Sewer Repair	Wetland Enhancement	NVC	0.03	Off-site in watershed	10/5/1998
Chocolate Access MH 273 to 267	Wetland Enhancement	EW	0.0064	Off-site out of watershed	
Chocolate Combined	Wetland Enhancement	NVC	0.008	Off-site out of watershed	8/1/2000
Huckleberry (32nd & Beech)	Wetland Enhancement	DWET	0.007	Off-site out of watershed	7/17/2001
Huckleberry (32nd & Beech)	Wetland Enhancement	NVC	0.005	Off-site out of watershed	7/17/2001
Hwy 163 Corridor (7th & Brookes 2002Emergency Repa	Wetland Enhancement	NVC	0.02	Off-site in watershed	11/30/2002
Junipero Serra (Jackson/Mission Gorge Emergency)	Wetland Enhancement	SWS	0.01	Off-site in watershed	11/13/2002
Junipero Serra (Mission Gorge Emergency Repair)	Wetland Enhancement	SWS	0.03	Off-site in watershed	12/11/2001
Junipero Serra (Superior Ready Mix Emergency Repai	Wetland Enhancement	SWS	0.6	Off-site in watershed	1/26/2002
Junipero Serra (Superior Ready Mix Emergency Repai	Wetland Enhancement	NVC	0.04	Off-site in watershed	1/26/2002
Junipero Serra (Superior Ready Mix Emergency Repai	Wetland Enhancement	SCWRF	0.18	Off-site in watershed	1/26/2002
Lake Murray Emergency Cleaning	Wetland Enhancement	NVC	0.01	In-canyon	12/1/2002
Lake Murray Emergency Cleaning	Wetland Enhancement	SWS	0.01	In-canyon	12/1/2002
Lake Murray Trunk Sewer and Permanent Access Path	Wetland Enhancement	SWS	0.32	In-canyon	
Lake Murray Trunk Sewer and Permanent Access Path	Wetland Enhancement	NVC	0.01	In-canyon	
Lake Murray Trunk Sewer and Permanent Access Path	Wetland Enhancement	FM	0.07	In-canyon	

Lake Murray

Impact Project	Mitigation Type	Habitat Type	Acreage	Location	Impact Date
Mission Center Rd. (Kearny Mesa)	Wetland Enhancement	SWS	0.007	Off-site in watershed	1/13/2002
Switzer Canyon Emergency Sewer Repair Project	Wetland Enhancement	NVC	0.05	Off-site out of watershed	2/27/2002
Total Mitigation Acres:			1.5624 acres		

Los Penasquitos North

Impact Project	Mitigation Type	Habitat Type	Acreage	Location	Impact Date
upland					
Los Penasquitos North Wetland Creation Project	Upland Restoration	DCSS	0.82	On-impact	
Torreyana Sewer Repair	Upland Restoration	DCSS	0.21	Off-site in watershed	10/1/2001
Total Mitigation Acres:			1.03 acres		

wetland

Acuna LT	Wetland Creation	DWET	0.01	Off-site in watershed	2/1/2005
Black Mountain Road Finger Canyon	Wetland Creation	FM	0.006	In-canyon	4/4/2003
Carmel Valley Rd Emergency Water Break	Wetland Creation	RS	0.026	Off-site in watershed	10/22/2010
Carmel Valley Rd Emergency Water Break	Wetland Creation	SWS	0.008	Off-site in watershed	10/22/2010
Carroll and Mesa Rim	Wetland Creation	RW	0.72	Off-site in watershed	6/2/2003
Carroll and Mesa Rim	Wetland Creation	SWS	0.15	Off-site in watershed	6/2/2003
Carroll and Mesa Rim	Wetland Creation	MFS	0.44	Off-site in watershed	6/2/2003
Carroll and Mesa Rim	Wetland Creation	SCLORF	0.1	Off-site in watershed	6/2/2003
Lopez Canyon LT	Wetland Creation	SWS	0.03	In-canyon	
Lopez Canyon LT	Wetland Creation	NVC	0.01	In-canyon	
Lopez Canyon LT	Wetland Creation	RW	0.005	In-canyon	
Lopez Canyon LT MH 13 Access	Wetland Creation	AM	0.1	In-canyon	9/26/2013
Lopez Canyon Manhole 102 Maintenance	Wetland Creation	NVC	0.001	In-canyon	8/18/2005
Lopez Canyon MH 45 Protection	Wetland Creation	NVC	0.0004	In-canyon	

Los Penasquitos North

Impact Project	Mitigation Type	Habitat Type	Acreage	Location	Impact Date
Lopez Emergency Cleaning	Wetland Creation	EW	0.001	In-canyon	2/13/2005
Lopez Emergency Cleaning	Wetland Creation	SWS	0.08	In-canyon	2/13/2005
Lopez Emergency Cleaning	Wetland Creation	RF	0.004	In-canyon	2/13/2005
Lopez Emergency Cleaning	Wetland Creation	MFS	0.04	In-canyon	2/13/2005
Lopez MH 102 Emergency	Wetland Creation	NVC	0.003	In-canyon	12/18/2009
Lower Rose Creek Emergency Maintenance	Wetland Creation	FM	0.03	Off-site in watershed	2/20/2004
Lower Rose Creek Emergency Maintenance	Wetland Creation	MFS	0.05	Off-site in watershed	2/20/2004
Lower Rose Creek Emergency Maintenance	Wetland Creation	SWS	0.21	Off-site in watershed	2/20/2004
Lower Rose Creek Emergency Maintenance	Wetland Creation	RW	0.52	Off-site in watershed	2/20/2004
Park Mesa LT	Wetland Creation	NVC	0.006	Off-site in watershed	1/11/2011
Park Mesa LT	Wetland Creation	SWS	0.035	Off-site in watershed	1/11/2011
Penasquitos Preserve (East of Black Mountain Road)	Wetland Creation	SCWRF	0.09	In-canyon	10/16/2003
Penasquitos Preserve LT	Wetland Creation	SCWRF	0.12	In-canyon	
Penasquitos Preserve LT	Wetland Creation	SCLORF	0.053	In-canyon	
Penasquitos Preserve LT	Wetland Creation	RW	0.006	In-canyon	
Penasquitos Preserve LT	Wetland Creation	MFS	0.008	In-canyon	
Penasquitos Preserve LT	Wetland Creation	FM	0.045	In-canyon	
Penasquitos View Emergency	Wetland Creation	CAM	0.002	In-canyon	8/18/2004
Penasquitos Views Trunk Sewer	Wetland Creation	SWS	0.192	In-canyon	
Van Nuys Canyon MH # 91 Sewer Blockage	Wetland Creation	MFS	0.07	Off-site in watershed	12/4/1996
Van Nuys Installation of 2 36-inch Pipe Culverts	Wetland Creation	SWS	0.03	Off-site in watershed	2/7/2001
Van Nuys MH #92-76 Four Sewer Breaks (Upper Canyon	Wetland Creation	MFS	0.146	Off-site in watershed	8/4/2000
Van Nuys MH #92-76 Four Sewer Breaks (Upper Canyon	Wetland Creation	DWET	0.25	Off-site in watershed	8/4/2000

Total Mitigation Acres: 3.5974 acres

Marron Valley Cornerstone Lands Conservation Bank

Impact Project	Mitigation Type	Habitat Type	Acreage	Location	Impact Date
upland					
45th & Boston	Upland Bank	NNG	0.07	Off-site out of watershed	12/13/2002
54th & Maisel	Upland Bank	DCSS	0.04	Off-site out of watershed	7/2/2001
60th Street Pipe Relocation/Permanent Access	Upland Bank	NNG	0.024	Off-site out of watershed	
60th Street Pipe Relocation/Permanent Access	Upland Bank	DCSS	0.095	Off-site out of watershed	
Alvarado LT	Upland Bank	DCSS	0.07	Off-site out of watershed	
Alvarado LT	Upland Bank	CC	0.04	Off-site out of watershed	
Alvarado LT	Upland Bank	SMC	0.01	Off-site out of watershed	
Balboa Terrace Trunk Sewer Replacement	Upland Bank	DCSS	0.354	Off-site out of watershed	9/16/2012
Buchanan	Upland Bank	DCSS	0.04	Off-site out of watershed	3/11/2002
Buchanan	Upland Bank	SMC	0.12	Off-site out of watershed	3/11/2002
Buchanan	Upland Bank	POS	0.13	Off-site out of watershed	3/11/2002
Buchanan (10th & Johnson Ave. Emergency Repair)	Upland Bank	DCSS	0.13	Off-site out of watershed	9/6/2002
Buchanan (Highway 163 & Lincoln Street Emergency)	Upland Bank	DCSS	0.018	Off-site out of watershed	4/11/2003
Buchanan (Highway 163 & Lincoln Street Emergency)	Upland Bank	SMC	0.054	Off-site out of watershed	4/11/2003
Buchanan LT	Upland Bank	SMC	0.043	Off-site out of watershed	1/1/2004
Buchanan LT	Upland Bank	POS	0.026	Off-site out of watershed	1/1/2004
Buchanan/Caminito Fuente	Upland Bank	DCSS	0.02	Off-site out of watershed	9/15/2004
Dakota Canyon Replacement/Relocation/Access	Upland Bank	DCSS	0.57	Off-site out of watershed	1/22/2008
Euclid & Menlo (47th & Thorn Sewer Maint & Emerg)	Upland Bank	NNG	0.05	Off-site out of watershed	2/1/2004
Euclid & Menlo (47th & Thorn Sewer Maint & Emerg)	Upland Bank	DCSS	0.01	Off-site out of watershed	2/1/2004
Hwy 163 North LT	Upland Bank	NNG	0.19	Off-site out of watershed	
I-805 & 94 Canyon (40th & C Emergency Repair)	Upland Bank	NNG	0.011	Off-site out of watershed	2/6/2003
I-805 & 94 Canyon (40th & C Emergency Repair)	Upland Bank	SMC	0.016	Off-site out of watershed	2/6/2003

Marron Valley Cornerstone Lands Conservation Bank

Impact Project	Mitigation Type	Habitat Type	Acreage	Location	Impact Date
Lexington (Central & Redwood Emergency)	Upland Bank	NNG	0.14	Off-site out of watershed	1/1/1999
Lexington (Central & Redwood Emergency)	Upland Bank	SMC	0.002	Off-site out of watershed	1/1/1999
Lexington/Manzanita Pipe and MH Replacement Emer	Upland Bank	SMC	0.059	Off-site out of watershed	11/4/2008
Mission Center LT	Upland Bank	DCSS	0.14	Off-site out of watershed	7/1/2004
Mission Center LT	Upland Bank	SMC	0.04	Off-site in watershed	7/1/2004
Norfolk (Fairmont & Montezuma)	Upland Bank	SMC	0.106	Off-site out of watershed	4/22/2002
Norfolk (Fairmont & Montezuma)	Upland Bank	BBS	0.06	Off-site out of watershed	4/22/2002
Norfolk (Fairmont & Montezuma)	Upland Bank	DCSS	0.398	Off-site out of watershed	4/22/2002
Norfolk (Fairmont & Montezuma)	Upland Bank	POS	0.151	Off-site out of watershed	4/22/2002
Norfolk Canyon Maintenance Project	Upland Bank	SMC	0.002	Off-site out of watershed	6/10/2004
Norfolk Canyon Maintenance Project	Upland Bank	DCSS	0.302	Off-site out of watershed	6/10/2004
Norfolk LT	Upland Bank	SMC	0.02	Off-site out of watershed	7/1/2004
Otay Valley TS Pipe Protection	Upland Bank	NNG	0.02	Off-site out of watershed	9/16/2013
Pump Station 77 Inspections	Upland Bank	NNG	0.02	Off-site out of watershed	
Pump Station 77 Inspections	Upland Bank	DCSS	0.348	Off-site out of watershed	
Rancho Bernardo 15 East	Upland Bank	DCSS	0.31	Off-site out of watershed	3/17/2004
Rancho Bernardo 15 East (Escala Emergency)	Upland Bank	DCSS	0.1	Off-site out of watershed	8/24/2007
Rancho Mission LT	Upland Bank	DCSS	0.006	Off-site out of watershed	11/12/2013
Shepherd	Upland Bank	DCSS	0.01	Off-site out of watershed	2/1/2003
Shepherd LT	Upland Bank	NNG	0.09	Off-site in watershed	
South Chollas LTA	Upland Bank	DCSS	0.508	Off-site out of watershed	
Stevenson	Upland Bank	DCSS	0.14	Off-site out of watershed	8/8/2001
Stevenson	Upland Bank	POS	0.04	Off-site out of watershed	8/8/2001
Stevenson Canyon Manhole 138 Emergency	Upland Bank	NNG	0.18	Off-site out of watershed	3/23/2006

Marron Valley Cornerstone Lands Conservation Bank

Impact Project	Mitigation Type	Habitat Type	Acreage	Location	Impact Date
Stevenson Long Term Access Project	Upland Bank	NNG	0.28	Off-site out of watershed	
Trinidad & Euclid	Upland Bank	SMC	0.13	Off-site out of watershed	5/9/2001
USIU	Upland Bank	SMC	0.2	Off-site out of watershed	
USIU	Upland Bank	DCSS	0.2	Off-site out of watershed	
USIU	Upland Bank	NNG	0.75	Off-site out of watershed	
Total Mitigation Acres:			6.883 acres		

Otay Mesa Mitigation Bank

Impact Project	Mitigation Type	Habitat Type	Acreage	Location	Impact Date
upland					
15 West and Elanus	Upland Bank	DCSS	0.2	Off-site out of watershed	12/19/2003
Acuna	Upland Bank	DCSS	0.01	Off-site out of watershed	3/11/2002
Acuna	Upland Bank	SMC	0.07	Off-site out of watershed	3/11/2002
Auburn & Belle Island (Isla Vista/Auburn Dr. Emerg	Upland Bank	DCSS	0.06	Off-site out of watershed	10/21/2002
Bounty & Waring (Bounty & Spear Emergency Repair)	Upland Bank	DCSS	0.2	Off-site out of watershed	4/29/2003
Elanus & Murray Canyons (I-15 & Clairemont Mesa Bl	Upland Bank	DCSS	0.122	Off-site out of watershed	12/11/2002
Euclid & Menlo (47th & Thorn Sewer Maint & Emerg)	Upland Bank	SMRC	0.05	Off-site out of watershed	2/1/2004
Euclid & Menlo Canyon (47th & Thorn Emergency Repa	Upland Bank	SMRC	0.02	Off-site out of watershed	4/29/2002
Fairmont & Home	Upland Bank	SMRC	0.11	Off-site out of watershed	4/9/2004
Fairmont & Home	Upland Bank	NNG	0.25	Off-site out of watershed	4/9/2004
Hopkins	Upland Bank	NNG	0.14	Off-site out of watershed	3/17/2004
Hopkins (Calle Abajo Emergency)	Upland Bank	NNG	0.09	Off-site out of watershed	4/3/2002
Hwy 163 North LT	Upland Bank	CLOW	0.04	Off-site out of watershed	
Norfolk (Fairmont & Montezuma)	Upland Bank	SOC	0.046	Off-site out of watershed	4/22/2002
Rancho Bernardo 15 East	Upland Bank	DCSS	0.31	Off-site out of watershed	3/17/2004

Otay Mesa Mitigation Bank

Impact Project	Mitigation Type	Habitat Type	Acreage	Location	Impact Date
Rancho Mission LT	Upland Bank	DCSS	0.026	Off-site out of watershed	11/12/2013
South Juniper Emergency Project	Upland Bank	DCSS	0.001	Off-site out of watershed	5/14/2006
Switzer MH 152 Access	Upland Bank	SOC	0.009	Off-site out of watershed	1/27/2014
Total Mitigation Acres:			1.754 acres		

Penasquitos Eucalyptus Removal

Impact Project	Mitigation Type	Habitat Type	Acreage	Location	Impact Date
wetland					
Carroll and Mesa Rim	Wetland Enhancement	RW	0.31	Off-site in watershed	6/2/2003
Total Mitigation Acres:			0.31 acres		

Rancho Mission Enhancement

Impact Project	Mitigation Type	Habitat Type	Acreage	Location	Impact Date
wetland					
15 West and Elanus	Wetland Enhancement	SWS	0.05	Off-site in watershed	12/19/2003
Alvarado Court Sewer Crossing	Wetland Enhancement	SWS	0.005	Off-site in watershed	
Alvarado LT	Wetland Enhancement	MFS	0.01	Off-site in watershed	
Alvarado LT	Wetland Enhancement	NVC	0.01	Off-site in watershed	
Alvarado LT	Wetland Enhancement	DWET	0.01	Off-site in watershed	
Alvarado Trunk Sewer	Wetland Enhancement	DWET	0.022	Off-site in watershed	
Barr Avenue (Hotel Circle) part of Dove Canyon	Wetland Enhancement	NVC	0.01	Off-site in watershed	8/16/2003
Bay View Emergency Response Project	Wetland Enhancement	NVC	0.013	Off-site out of watershed	8/20/2004
Buchanan	Wetland Enhancement	DWET	0.322	Off-site in watershed	3/11/2002
Buchanan	Wetland Enhancement	SWS	0.0108	Off-site in watershed	3/11/2002
Buchanan B	Wetland Enhancement	NVC	0.02	Off-site in watershed	
Buchanan LT	Wetland Enhancement	DWET	0.06	Off-site in watershed	1/1/2004

Rancho Mission Enhancement

Impact Project	Mitigation Type	Habitat Type	Acreage	Location	Impact Date
Buchanan LT	Wetland Enhancement	NVC	0.624	Off-site in watershed	1/1/2004
Buchanan Sewer Blockage Emergency	Wetland Enhancement	SWS	0.011	Off-site in watershed	12/2/2013
Chollas Dam Vegetation Removal	Wetland Enhancement	FM	0.022	Off-site in watershed	1/22/2013
Chollas Exposed Water Main Repair	Wetland Enhancement	RS	0.014	Off-site out of watershed	8/30/2011
Delevan & I-15 Emerg Repair (South Juniper Canyon)	Wetland Enhancement	NVC	0.03	Off-site out of watershed	7/27/2005
Elanus & Murray Canyons (I-15 & Clairemont Mesa Bl	Wetland Enhancement	SWS	0.007	Off-site in watershed	12/11/2002
Elanus (I-15 & Clairemont Mesa Blvd) LT	Wetland Enhancement	EW	0.005	Off-site in watershed	
Euclid & Menlo (47th & Thorn Sewer Maint & Emerg)	Wetland Enhancement	DWET	0.08	Off-site out of watershed	2/1/2004
Euclid & Menlo (47th & Thorn Sewer Maint & Emerg)	Wetland Enhancement	NVC	0.01	Off-site out of watershed	2/1/2004
Euclid & Menlo Canyon (47th & Thorn Emergency Repa	Wetland Enhancement	NVC	0.0011	Off-site out of watershed	4/29/2002
Euclid and Menlo Emerg Pipe Protection	Wetland Enhancement	NVC	0.005	Off-site out of watershed	5/26/2011
Federal & Chollas	Wetland Enhancement	DWET	0.0008	Off-site out of watershed	10/22/2002
Fox Canyon (University & 49th) Emergency Repair	Wetland Enhancement	NVC	0.002	Off-site out of watershed	10/29/2007
Hopkins	Wetland Enhancement	DWET	0.02	Off-site out of watershed	3/17/2004
Hopkins (Calle Abajo Emergency)	Wetland Enhancement	NVC	0.002	Off-site out of watershed	4/3/2002
Huckleberry (32nd St Canyon Emergency Maintenance)	Wetland Enhancement	DWET	0.04	Off-site out of watershed	7/21/2003
Hwy 163 Corridor (7th & Brookes 2002Emergency Repa	Wetland Enhancement	NVC	0.02	Off-site out of watershed	11/30/2002
Hwy 163 North LT	Wetland Enhancement	NVC	0.001	Off-site out of watershed	
I-15 & Adams	Wetland Enhancement	NVC	0.07	Off-site in watershed	5/6/2004
I-15 & Adams	Wetland Enhancement	EW	0.004	Off-site in watershed	5/6/2004
I-805 & 94 Canyon (40th & C Emergency Repair)	Wetland Enhancement	NVC	0.0013	Off-site out of watershed	2/6/2003
Isla Vista Emergency Response Project	Wetland Enhancement	NVC	0.003	Off-site out of watershed	5/17/2004
Lexington/Manzanita Pipe and MH Replacement Emer	Wetland Enhancement	NVC	0.016	Off-site out of watershed	11/4/2008
Lexington/Manzanita Pipe Encasement Emergency	Wetland Enhancement	NVC	0.005	Off-site out of watershed	6/4/2009

Rancho Mission Enhancement

Impact Project	Mitigation Type	Habitat Type	Acreage	Location	Impact Date
Market & Euclid (MH 88 Repair at Encanto Creek)	Wetland Enhancement	SWS	0.003	Off-site out of watershed	10/22/2009
Mission Center Canyon B	Wetland Enhancement	EW	0.02	Off-site in watershed	1/1/2011
Mission Center Canyon B	Wetland Enhancement	DWET	0.014	Off-site in watershed	1/1/2011
Mission Center Canyon B	Wetland Enhancement	RS	0.025	Off-site in watershed	1/1/2011
Mission Center Canyon Emergency Sewer Repair	Wetland Enhancement	SWS	0.004	Off-site in watershed	3/10/2010
Mission Center Canyon Emergency Sewer Repair	Wetland Enhancement	FM	0.023	Off-site in watershed	3/10/2010
Mission Center Canyon Emergency Sewer Repair	Wetland Enhancement	NVC	0.014	Off-site in watershed	3/10/2010
Mission Center Canyon Emergency Sewer Repair	Wetland Enhancement	DWET	0.006	Off-site in watershed	3/10/2010
Murphy Canyon TS Access and Repair	Wetland Enhancement	FM	0.051	Off-site out of watershed	
Norfolk (Fairmont & Montezuma)	Wetland Enhancement	SWS	0.003	Off-site in watershed	4/22/2002
Norfolk (Fairmont & Montezuma)	Wetland Enhancement	NVC	0.042	Off-site in watershed	4/22/2002
Norfolk Canyon Maintenance Project	Wetland Enhancement	NVC	0.002	Off-site in watershed	6/10/2004
Presidio (Palm Cyn) GJ665	Wetland Enhancement	RS	0.165	Off-site in watershed	
Presidio (Palm Cyn) GJ665	Wetland Enhancement	NVC	0.0137	Off-site in watershed	
Rancho Mission (Mission Gorge Canyon, Conestoga Co	Wetland Enhancement	NVC	0.008	In-canyon	2/7/2002
Rancho Mission (Mission Gorge Canyon, Conestoga Co	Wetland Enhancement	DWET	0.005	In-canyon	2/7/2002
Rancho Mission LT	Wetland Enhancement	SWS	0.007	Off-site in watershed	11/12/2013
San Diego Mission Rd Emergency	Wetland Enhancement	FM	0.01	Off-site in watershed	7/9/2011
San Diego Mission Rd Emergency	Wetland Enhancement	SWS	0.01	Off-site in watershed	7/9/2011
Shepherd	Wetland Enhancement	SWS	0.01	Off-site in watershed	2/1/2003
Shepherd LT	Wetland Enhancement	RW	0.06	Off-site in watershed	
Shepherd LT	Wetland Enhancement	RS	0.02	Off-site in watershed	
Shepherd LT	Wetland Enhancement	NVC	0.03	Off-site in watershed	
Shepherd LT	Wetland Enhancement	DWET	0.015	Off-site in watershed	

Rancho Mission Enhancement

Impact Project	Mitigation Type	Habitat Type	Acreage	Location	Impact Date
South Chollas LTA	Wetland Enhancement	MFS	0.0015	Off-site out of watershed	
South Juniper Emergency Project	Wetland Enhancement	NVC	0.02	Off-site out of watershed	5/14/2006
Valencia Canyon Emergency Repair & Maintenance	Wetland Enhancement	MFS	0.004	Off-site out of watershed	1/25/2003
Valencia Canyon Emergency Repair & Maintenance	Wetland Enhancement	NVC	0.0014	Off-site out of watershed	1/25/2003
Willow St. Canyon	Wetland Enhancement	NVC	0.004	Off-site out of watershed	5/2/2005
Woodman Canyon Emergency Sewer Access and Repair	Wetland Enhancement	NVC	0.004	Off-site out of watershed	1/6/2005
Total Mitigation Acres:			2.1326 acres		

Rose Canyon Wetland and Upland

Impact Project	Mitigation Type	Habitat Type	Acreage	Location	Impact Date
upland					
I-5/SR-52 Maintenance Project	Upland Restoration	NNG	0.01	In-canyon	
I-5/SR-52 Maintenance Project	Upland Restoration	DCSS	0.02	In-canyon	
Middle Rose Creek (ER Repair -Rose W of Genesee)	Upland Restoration	NNG	0.04	In-canyon	12/1/2002
Middle Rose Creek (ER Repair -Rose W of Genesee)	Upland Restoration	DCSS	0.06	In-canyon	12/1/2002
Miramar Trunk Sewer Replacement Project	Upland Restoration	POS	0.117	In-canyon	7/6/2007
Miramar Trunk Sewer Replacement Project	Upland Restoration	BBS	0.959	In-canyon	7/6/2007
Miramar Trunk Sewer Replacement Project	Upland Restoration	CLOW	0.154	In-canyon	7/6/2007
Miramar Trunk Sewer Replacement Project	Upland Restoration	NNG	0.181	In-canyon	7/6/2007
Miramar Trunk Sewer Replacement Project	Upland Restoration	DCSS	0.737	In-canyon	7/6/2007
Miramar Trunk Sewer Replacement Project	Upland Restoration	SOC	0.027	In-canyon	7/6/2007
Miramar Trunk Sewer Replacement Project	Upland Restoration	SMC	0.058	In-canyon	7/6/2007
Old Rose Canyon Sewer Relocation Project	Upland Restoration	NNG	0.045	In-canyon	2/8/2011
Penasquitos Bluffs (Finger Canyon Emergency)	Upland Restoration	SOC	0.3	Off-site in watershed	11/1/2000
Penasquitos Bluffs (Finger Canyon Emergency)	Upland Restoration	NG	0.02	Off-site in watershed	11/1/2000

Rose Canyon Wetland and Upland

Impact Project	Mitigation Type	Habitat Type	Acreage	Location	Impact Date
Penasquitos View Emergency	Upland Restoration	DCSS	0.01	Off-site in watershed	8/18/2004
Rose Canyon ER Repairs between 9/01 and 5/03	Upland Restoration	BBS	0.03	In-canyon	9/1/2001
Rose Canyon ER Repairs between 9/01 and 5/03	Upland Restoration	POS	0.05	In-canyon	9/1/2001
Rose Canyon ER Repairs between 9/01 and 5/03	Upland Restoration	DCSS	0.13	In-canyon	9/1/2001
Rose Canyon ER Repairs between 9/01 and 5/03	Upland Restoration	NNG	0.2	In-canyon	9/1/2001
Total Mitigation Acres:			3.148 acres		

Wetland

Black Mtn Access Rd Repair	Wetland Creation	Streambed	0.038	Off-site in watershed	
I-5/SR-52 Maintenance Project	Wetland Creation	SWS	0.03	In-canyon	
Lower Rose Canyon Emergency Repairs (MH 15)	Wetland Enhancement	EW	0.005	In-canyon	2/8/2005
Lower Rose Canyon Emergency Repairs (MH 15)	Wetland Enhancement	MFS	0.11	In-canyon	2/8/2005
Lower Rose Canyon Emergency Repairs (MH 15)	Wetland Creation	SWS	0.32	In-canyon	2/8/2005
Lower Rose Canyon Emergency Repairs (MH 15)	Wetland Enhancement	CVFM	0.21	In-canyon	2/8/2005
Lower Rose Canyon Emergency Repairs (MH 15)	Wetland Creation	CVFM	0.21	In-canyon	2/8/2005
Lower Rose Canyon Emergency Repairs (MH 15)	Wetland Creation	MFS	0.11	In-canyon	2/8/2005
Lower Rose Canyon Emergency Repairs (MH 15)	Wetland Creation	EW	0.005	In-canyon	2/8/2005
Middle Rose Cyn MH 160 Emergency	Wetland Enhancement	NVC	0.02	Off-site in watershed	11/17/2011
Middle Rose Cyn MH 160 Emergency	Wetland Creation	SWS	0.02	Off-site in watershed	11/17/2011
Miramar Trunk Sewer Replacement Project	Wetland Creation	RW	0.577	In-canyon	7/6/2007
Miramar Trunk Sewer Replacement Project	Wetland Creation	MFS	1.352	In-canyon	7/6/2007
Miramar Trunk Sewer Replacement Project	Wetland Creation	SCLORF	0.162	In-canyon	7/6/2007
Miramar Trunk Sewer Replacement Project	Wetland Creation	SWS	0.445	In-canyon	7/6/2007
Monte Verde Sewer Improvements	Wetland Creation	SRF	0.04	In-canyon	1/1/2010
Old Rose Canyon Sewer Relocation Project	Wetland Creation	MFS	0.007	In-canyon	2/8/2011

Rose Canyon Wetland and Upland

Impact Project	Mitigation Type	Habitat Type	Acreage	Location	Impact Date
Old Rose Canyon Sewer Relocation Project	Wetland Creation	SWS	0.04	In-canyon	2/8/2011
Old Rose Canyon Sewer Relocation Project	Wetland Creation	FM	0.002	In-canyon	2/8/2011
Rose Canyon ER Repairs between 9/01 and 5/03	Wetland Creation	MFS	0.03	In-canyon	9/1/2001
Rose Canyon ER Repairs between 9/01 and 5/03	Wetland Creation	RW	0.02	In-canyon	9/1/2001
Rose Canyon ER Repairs between 9/01 and 5/03	Wetland Creation	NVC	0.0018	In-canyon	9/1/2001
Rose Creek East of I-805 (Miramar Rd & Commerce Av	Wetland Creation	SWS	0.03	In-canyon	3/11/2002
Rose Creek Emergency Bypass Project	Wetland Enhancement	NVC	0.005	In-canyon	1/31/2005
Total Mitigation Acres:			3.7898 acres		

San Clemente Wetland and Upland

Impact Project	Mitigation Type	Habitat Type	Acreage	Location	Impact Date
upland					
Gesner LT	Upland Restoration	DCSS	0.1	Off-site in watershed	
Gesner/Huron	Upland Restoration	NNG	0.01	Off-site in watershed	8/1/1998
Penasquitos Bluffs (Finger Canyon Emergency)	Upland Restoration	DCSS	0.71	Off-site in watershed	11/1/2000
Penasquitos Bluffs (Finger Canyon Emergency)	Upland Restoration	CC	0.02	Off-site in watershed	11/1/2000
Penasquitos Bluffs (Finger Canyon Emergency)	Upland Restoration	NNG	0.03	Off-site in watershed	11/1/2000
San Clemente (Emergency Repairs Combined)	Upland Restoration	DCSS	0.051	In-canyon	9/1/2001
San Clemente (Emergency Repairs Combined)	Upland Restoration	NNG	0.005	In-canyon	9/1/2001
San Clemente Canyon Access Path LT Project	Upland Restoration	DCSS	0.035	In-canyon	
San Clemente Canyon Access Path LT Project	Upland Restoration	CLOW	0.54	In-canyon	
San Clemente Canyon Biltmore Pipe Protection Emerg	Upland Restoration	NNG	0.051	In-canyon	11/30/2006
San Clemente Canyon Biltmore Pipe Protection Emerg	Upland Restoration	DCSS	0.01	In-canyon	11/30/2006
San Clemente Canyon Biltmore Pipe Protection Emerg	Upland Restoration	SMC	0.01	In-canyon	11/30/2006
San Clemente LT MH #4	Upland Restoration	DCSS	0.076	In-canyon	9/20/2010

San Clemente Wetland and Upland

Impact Project	Mitigation Type	Habitat Type	Acreage	Location	Impact Date
Wet Weather Stream Discharge	Upland Restoration	SMC	0.06	In-canyon	
Wet Weather Stream Discharge	Upland Restoration	DCSS	0.38	In-canyon	
Total Mitigation Acres:			2.088 acres		
wetland					
Balboa Terrace Trunk Sewer Replacement	Wetland Creation	FM	0.04	Off-site in watershed	9/16/2012
Balboa Terrace Trunk Sewer Replacement	Wetland Creation	SWS	0.064	Off-site in watershed	9/16/2012
Balboa Terrace Trunk Sewer Replacement	Wetland Creation	SCLORF	0.003	Off-site in watershed	9/16/2012
Balboa Terrace Trunk Sewer Replacement	Wetland Creation	MFS	0.022	Off-site in watershed	9/16/2012
Balboa Terrace Trunk Sewer Replacement	Wetland Creation	DWET	0.107	Off-site in watershed	9/16/2012
Balboa Terrace Trunk Sewer Replacement	Wetland Creation	NVC	0.014	Off-site in watershed	9/16/2012
Carroll Canyon Emergency Sewer Repair	Wetland Creation	SAWRF	0.03	Off-site in watershed	2/26/2010
Carroll Canyon Emergency Sewer Repair	Wetland Creation	NVC	0.01	Off-site in watershed	2/26/2010
Dakota Canyon Replacement/Relocation/Access	Wetland Creation	NVC	0.03	Off-site in watershed	1/22/2008
East Tecolote Canyon Pipe Encasemt Protection Proj	Wetland Creation	SRF	0.04	Off-site in watershed	10/4/2010
East Tecolote Canyon Pipe Encasemt Protection Proj	Wetland Creation	SWS	0.036	Off-site in watershed	10/4/2010
East Tecolote Canyon Pipe Encasemt Protection Proj	Wetland Creation	OW	0.023	Off-site in watershed	10/4/2010
Penasquitos Bluffs LT	Wetland Creation	FM	0.014	Off-site in watershed	
Penasquitos Bluffs LT	Wetland Creation	SWS	0.01	Off-site in watershed	
Penasquitos Bluffs LT	Wetland Creation	AM	0.014	Off-site in watershed	
San Clemente Canyon Access Path LT Project	Wetland Creation	SCLORF	0.85	In-canyon	
San Clemente Canyon Access Path LT Project	Wetland Creation	SCWRF	0.27	In-canyon	
San Clemente Canyon Biltmore Pipe Protection Emerg	Wetland Creation	NVC	0.004	In-canyon	11/30/2006
San Clemente Canyon Biltmore Pipe Protection Emerg	Wetland Creation	SCLORF	0.117	In-canyon	11/30/2006
San Clemente Canyon Mitigation Project	Wetland Creation	SCLORF	0.003	In-canyon	9/15/2007

San Clemente Wetland and Upland

Impact Project	Mitigation Type	Habitat Type	Acreage	Location	Impact Date
San Clemente Emergency Sewer Encasement Repair	Wetland Creation	NVC	0.01	In-canyon	12/13/2010
San Clemente Emergency Sewer Encasement Repair	Wetland Creation	SCLORF	0.02	In-canyon	12/13/2010
Soledad Valley Water Line Break	Wetland Creation	AM	0.2	Off-site in watershed	3/23/2009
Stevenson Long Term Access Project	Wetland Creation	SWS	0.028	Off-site in watershed	
Stevenson Long Term Access Project	Wetland Creation	MFS	0.085	Off-site in watershed	
Tecolote Mt. Ashmun Pipe Protection Emergency	Wetland Creation	RF	0.01	Off-site in watershed	1/17/2008
Wet Weather Stream Discharge	Wetland Creation	NVC	0.01	In-canyon	
Total Mitigation Acres:			2.064 acres		

Tecolote - Tree of Heaven removal

Impact Project	Mitigation Type	Habitat Type	Acreage	Location	Impact Date
wetland					
Tecolote	Wetland Enhancement	SCLORF	0.25	In-canyon	2/28/2001
Total Mitigation Acres:			0.25 acres		

Tecolote Canyon Wetland and Upland

Impact Project	Mitigation Type	Habitat Type	Acreage	Location	Impact Date
upland					
East Tecolote (East Clairemont)	Upland Restoration	DCSS	0.012	In-canyon	1/8/2002
East Tecolote (East Clairemont) LT	Upland Restoration	DCSS	0.286	In-canyon	
East Tecolote (East Clairemont) LT	Upland Restoration	POS	0.015	In-canyon	
East Tecolote (East Clairemont) LT	Upland Restoration	SOC	0.126	In-canyon	
East Tecolote Emergency MH 218	Upland Restoration	DCSS	0.027	In-canyon	2/8/2010
East Tecolote Manholes 223 and 224 Emergency	Upland Restoration	DCSS	0.009	In-canyon	12/16/2009
East Tecolote Manholes 223 and 224 Emergency	Upland Restoration	CLOW	0.018	In-canyon	12/16/2009
Manning Canyon Sewer Repair	Upland Restoration	DCSS	0.002	In-canyon	12/11/2013

Tecolote Canyon Wetland and Upland

Impact Project	Mitigation Type	Habitat Type	Acreage	Location	Impact Date
Manning Street Sewer Repair	Upland Restoration	DCSS	1	In-canyon	7/6/2001
Manning Street Sewer Repair	Upland Restoration	NNG	0.1	In-canyon	7/6/2001
Park Mesa LT	Upland Restoration	NNG	0.009	Off-site in watershed	1/11/2011
Park Mesa LT	Upland Restoration	DCSS	0.108	Off-site in watershed	1/11/2011
Park Mesa LT	Upland Restoration	SMC	0.015	Off-site in watershed	1/11/2011
Park Mesa Way	Upland Restoration	BBS	0.04	In-canyon	1/13/2000
Stevenson Canyon MH 257 Emergency	Upland Restoration	DCSS	0.0048	Off-site in watershed	10/30/2012
Tecolote	Upland Restoration	DCSS	0.07	In-canyon	2/28/2001
Tecolote	Upland Restoration	POS	0.03	In-canyon	2/28/2001
Tecolote (including Mt. Elbrus)	Upland Restoration	NNG	0.05	In-canyon	11/18/2002
Tecolote (including Mt. Elbrus)	Upland Restoration	DCSS	0.245	In-canyon	11/18/2002
Tecolote Canyon Mitigation Project	Upland Restoration	POS	0.65	In-canyon	
Tecolote Emergency Pipe Repair (Crossing)	Upland Restoration	DCSS	0.004	In-canyon	12/13/2004
Tecolote LT	Upland Restoration	DCSS	0.4	In-canyon	
Tecolote Pipe Repair Near Manhole 346	Upland Restoration	DCSS	0.024	In-canyon	8/17/2009
Tecolote Pipe Repair Near Manhole 346	Upland Restoration	NNG	0.11	In-canyon	8/17/2009

Total Mitigation Acres: 3.3548 acres

wetland

East Tecolote (East Clairemont)	Wetland Creation	SWS	0.0001	In-canyon	1/8/2002
East Tecolote (East Clairemont)	Wetland Creation	SRF	0.004	In-canyon	1/8/2002
East Tecolote (East Clairemont) LT	Wetland Creation	SWS	0.039	In-canyon	
East Tecolote (East Clairemont) LT	Wetland Creation	SRF	0.229	In-canyon	
East Tecolote (East Clairemont) LT	Wetland Creation	NVC	0.008	In-canyon	
East Tecolote (East Clairemont) LT	Wetland Creation	FM	0.014	In-canyon	

Tecolote Canyon Wetland and Upland

Impact Project	Mitigation Type	Habitat Type	Acreage	Location	Impact Date
East Tecolote Emergency MH 218	Wetland Creation	NVC	0.007	In-canyon	2/8/2010
East Tecolote Emergency MH 218	Wetland Creation	SRF	0.048	In-canyon	2/8/2010
East Tecolote Manholes 223 and 224 Emergency	Wetland Creation	FM	0.039	In-canyon	12/16/2009
East Tecolote Manholes 223 and 224 Emergency	Wetland Creation	SWS	0.033	In-canyon	12/16/2009
East Tecolote Manholes 223 and 224 Emergency	Wetland Creation	SRF	0.034	In-canyon	12/16/2009
East Tecolote Manholes 223 and 224 Emergency	Wetland Creation	OW	0.015	In-canyon	12/16/2009
Park Mesa Way	Wetland Creation	SWS	0.15	In-canyon	1/13/2000
Tecolote (including Mt. Elbrus)	Wetland Creation	SCLORF	0.2	In-canyon	11/18/2002
Tecolote (including Mt. Elbrus)	Wetland Creation	SWS	0.13	In-canyon	11/18/2002
Tecolote Emergency Pipe Repair (Crossing)	Wetland Creation	EW	0.002	In-canyon	12/13/2004
Tecolote Emergency Pipe Repair (Crossing)	Wetland Creation	SWS	0.008	In-canyon	12/13/2004
Tecolote Emergency Pipe Repair (Crossing)	Wetland Creation	SCLORF	0.002	In-canyon	12/13/2004
Tecolote LT	Wetland Creation	MFS	0.01	In-canyon	
Tecolote LT	Wetland Creation	SWS	0.03	In-canyon	
Tecolote LT	Wetland Creation	SRF	0.341	In-canyon	
Tecolote MH 101 Emergency	Wetland Creation	NVC	0.0034	In-canyon	4/5/2010
Tecolote MH 101 Emergency	Wetland Creation	MFS	0.0005	In-canyon	4/5/2010
Tecolote Mt. Ashmun Pipe Protection Emergency	Wetland Creation	RF	0.01	In-canyon	1/17/2008
Tecolote Mt. Ashmun Pipe Protection Erosion Contro	Wetland Creation	RF	0.002	In-canyon	9/9/2009
Tecolote Mt. Ashmun Pipe Protection Erosion Contro	Wetland Creation	SWS	0.001	In-canyon	9/9/2009
Tecolote North Exposed TS Emergency	Wetland Creation	NVC	0.001	In-canyon	10/31/2013
Tecolote Pipe Repair Near Manhole 346	Wetland Creation	SRF	0.035	In-canyon	8/17/2009
Total Mitigation Acres:			1.396 acres		

From: [Friends of Rose Canyon](#)
To: [PLN PlanningCEQA](#)
Subject: University Community Plan Amendment - Att. 7
Date: Monday, January 04, 2016 4:33:04 PM
Attachments: [7. 2014 OSCAC Annual STATUS REPORT.pdf](#)

Dear Ms. Morrison,

This is Attachment 7 (out of 20) for Scoping Comments submitted by Friends of Rose Canyon.

Deborah Knight
Friends of Rose Canyon
858-597-0220

From: [Friends of Rose Canyon](#)
To: [PLN PlanningCEQA](#)
Subject: University Community Plan Amendment - Att. 8
Date: Monday, January 04, 2016 4:34:58 PM
Attachments: [8. SOW rest maint Rose and SC.pdf](#)
Importance: High

Dear Ms. Morrison,

This is Attachment 8 (out of 20) for Scoping Comments submitted by Friends of Rose Canyon.

Deborah Knight
Friends of Rose Canyon
858-597-0220

SCOPE OF WORK

San Clemente and Rose Canyon Mitigation Projects Additional Habitat Restoration Maintenance

Project Overview

The San Clemente and Rose Canyon Mitigation projects are habitat restoration projects that created wetlands, enhanced wetlands, and restored upland habitat to satisfy habitat mitigation needs of the Public Utilities Department. Both sites completed the 5 years of maintenance but have not received full agency sign off. While the City awaits regulatory approval and sign-off for the completion of the projects, additional maintenance to keep the sites free of weeds and debris is required.

Scope of Work

The scope of work under this contract shall consist of trash removal, watering of select planted trees and weeding.

Watering

Due to severe drought conditions some of the larger trees on both sites are showing signs of stress. Trees outlined below shall be watered:

San Clemente- 25 western sycamore trees at Regents Site shall be watered with a minimum of 8-10 gallons each watering visit.

Rose Canyon- 100 coast live oak trees need watering at the Rose Canyon Site. Each oak shall receive a minimum of 5 gallons per watering visit.

Maintenance

Maintenance at each site shall include removal of trash and debris and weed eradication. All trash and debris shall be collected from the site and disposed off at a licensed landfill facility. All invasive non-native weeds shall be targeted for eradication from both sites. All weeds over 6 inches in height shall be physically removed from the site along with any seed material. Smaller weeds may be treated with herbicide and left in place with the permission of the City. Weed debris collected from the project site shall be disposed of at a legally acceptable landfill facility. Maintenance shall be completed throughout the entirety of each site.

General

The Contractor shall be responsible for ensuring that care is taken so that existing native vegetation is not trampled or impacted throughout the duration of the work. Access to the restoration sites will be off of Regents Road and Genesee Avenue via an existing dirt roadway. Access into the restoration site is by foot only. Trucks may be parked on the dirt access road adjacent to each site with the coordination and permission of the Park and Recreation Department. No additional impacts to native habitat will occur as a result of continued maintenance to the restoration sites. The Contractor shall be responsible for ensuring that all litter, including lunch packaging, tobacco debris, and all trash is removed from the job site at the end of each working day. The Contractor shall also be responsible for ensuring that all work is performed with appropriate personal protection gear and shall ensure that necessary safety procedures and precautions are exercised at all times.

Permit Conditions

The Project is located in an environmentally sensitive area and any work associated with the restoration areas must remain in the designated locations. All work performed for the Project must adhere to any and all applicable permit conditions.

Qualifications

Contractors shall have personnel who are capable of identifying native and non-native floral species. The Contractor shall submit to the Public Utilities Environmental Section the job foreman's name, address, phone number, number of persons assigned to the project, and work schedule for the above tasks prior to performing any field work on the project.

Bid Requirements

Contractors must possess current C-27 and Pesticide Applicator's Licenses. Contractors must also possess liability insurance of a minimum of \$1,000,000 which names the City as additionally insured to be eligible for this contract. Proof of required licenses shall be submitted with cost estimate. Evidence of liability insurance shall be required prior to starting work onsite.

Bid Items

Contractors shall use the attached price proposal form to submit their cost estimate. A \$1,000 allowance has been allotted to cover extraordinary labor which may be necessary to complete the project. No expenditure of this allowance is authorized without prior City approval.

City contracts require compliance with Prevailing Wage and Living Wage Ordinances.

Bids will be accepted no later than 2:00 p.m. Monday, November 3, 2014. Please email bids to the address below.

Keli Balo
City of San Diego, Public Utilities
(858) 292-6423 (voice)
kbalo@sandiego.gov

Attachments: Price Proposal Form
San Clemente Mitigation Site Maps
Rose Canyon Mitigation Site Maps

**San Clemente and Rose Canyon Mitigation Projects
Additional Habitat Restoration Maintenance
Price Proposal Form**

ITEM NO.	DESCRIPTION	QUANTITY	UNIT	UNIT PRICE	AMOUNT
Unit Cost Items					
1	Watering of Western Sycamores at San Clemente Canyon	2	Watering Visit		
2	Watering of Oak Trees at Rose Canyon	2	Watering Visit		
3	Maintenance at San Clemente Site	4	Each Visit		
4	Maintenance at Rose Canyon	6	Each Visit		
Lump Sum Items					
5	Extraordinary labor items (Allowance Item)	Lump Sum	N/A	N/A	\$1,000
6	TOTAL FOR PROPOSAL – (ITEMS 1 - 5 INCLUSIVE) Bid Complies with Living Wage Ordinance				

Signature

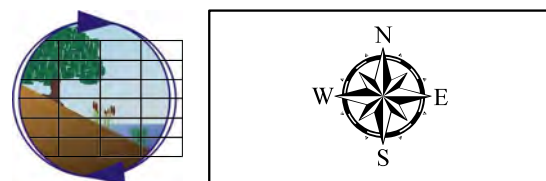
Date

Print Name

Company Name

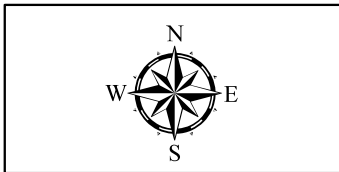
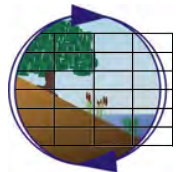
Attach:

- A. C-27 License Number
- B. Applicator License Information



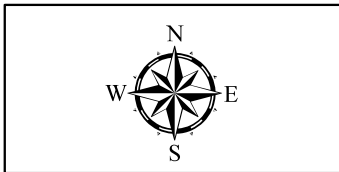
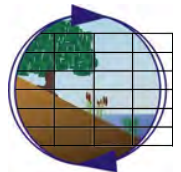
Final Mitigation Habitat Distribution
Rose Canyon Upland and Wetland Mitigation Project

Figure 2



San Clemente Canyon Mitigation Project
 Regents Road Site

Figure 2a



San Clemente Canyon Mitigation Project
Genesee Avenue Site

Figure 2b

From: [Friends of Rose Canyon](#)
To: [PLN_PlanningCEQA](#)
Subject: University Community Plan Amendment - Att. 9-11
Date: Monday, January 04, 2016 4:37:40 PM
Attachments: [9. USFWSCDFG UCNSTCS DEIR Comment.pdf](#)
[10. USFWSCDFG on FEIR.pdf](#)
[11. Regents Aeria with MHPA and Gnatcatchers. UCNSTCS EIR.jpeg](#)
Importance: High

Dear Ms. Morrison,

Here are Attachments 9 - 11 (out of 20) for the Friends of Rose Canyon's scoping comments.

Deborah Knight
Friends of Rose Canyon
858-597-0220





U.S. Fish and Wildlife Service
Carlsbad Fish and Wildlife Office
6010 Hidden Valley Road
Carlsbad, California 92009
(760) 431-9440
FAX (760) 431-5902 + 9618



CA. Department of Fish and Game
South Coast Regional Office
4949 Viewridge Avenue
San Diego, CA 92123
(858) 467-4201
FAX (858) 467-4299

In Reply Refer to: FWS-SDG-3970.2

Ms. Martha Blake, Associate Planner
City of San Diego
Development Services Center
1222 First Avenue, MS 501
San Diego California 92101

Re: Draft Environmental Impact Report for the University City North/South Transportation
Corridor Study (SCH# 2004031011)

Dear Ms. Blake:

The U.S. Fish and Wildlife Service (Service) and the California Department of Fish and Game (Department), collectively the "Wildlife Agencies," have reviewed the above-referenced draft Environmental Impact Report (DEIR) for the University City North/South Transportation Corridor Study (Transportation Study), which we received on November 29, 2004, and the Errata to the DEIR which we received on February 24, 2005. The Errata included a notice of extension of review of the DEIR, establishing the end of the public review period as April 14, 2005. We also attended the City of San Diego's (City) December 9, 2003, pre-application meeting on the proposed project, and commented on the Notice of Preparation (NOP) of the DEIR in a letter dated April 15, 2004. We appreciate the opportunity to comment on the DEIR. Based on the information provided herein, the Wildlife Agencies strongly recommend that the City eliminate the Regents Road Bridge from further consideration as a viable alternative to address the traffic congestion in the UC North/South Transportation corridor. Accordingly, the City should process an amendment to the University Community Plan to remove this bridge from the Plan's Transportation Element.

The Department is a Trustee Agency and a Responsible Agency pursuant to the California Environmental Quality Act, Sections 15386 and 15381, respectively. The Department is responsible for the conservation, protection, and management of the state's biological resources, including rare, threatened, and endangered plant and animal species, pursuant to the California Endangered Species Act and other sections of the Fish and Game Code. The Department also administers the Natural Community Conservation Planning program. The primary concern and mandate of the Service is the protection of public fish and wildlife resources and their habitats. The Service has legal responsibility for the welfare of migratory birds, anadromous fish, and endangered animals and plants occurring in the United States. The Service is also responsible for administering the Endangered Species Act of 1973, as amended (16 U.S.C. 1531 et seq.).



PROJECT OVERVIEW

Project Description

The Transportation Study evaluates several transportation alternatives intended to relieve traffic congestion, in particular, within and between the southern and northern portions of the community of University City in the City. The purpose of the DEIR is to provide an analysis of seven of the alternatives and any impacts that may result from their implementation to allow the decision-maker (i.e., the City Council) to select an alternative for implementation. The DEIR does not recommend one alternative over another, and indicates that, due to the general nature of the DEIR, additional environmental review may be required, and additional mitigation measures with a higher degree of specificity could be required in conjunction with discretionary permits (e.g., Streambed Alteration Agreement from the Department).

Alternatives

The seven alternatives described and analyzed in the DEIR are the following:

1. Genesee Avenue Widening (GAWA), which would expand this roadway from four to six lanes between State Route (SR) 52 and Nobel Drive, and would take roughly two years to complete;
2. Regents Road Bridge (RRBA), which would extend across Rose Canyon to connect the existing termini of that street at the north and south rims of the canyon, and would take one year to complete;¹
3. Genesee Avenue/Governor Drive Grade Separation, which would reconstruct the present intersection of these two streets to create an underpass beneath Governor Drive to accommodate through-traffic on Genesee Avenue;
4. Combination of the Regents Road Bridge and the Genesee Avenue Widening (no Grade Separation);
5. Combination of the Regents Road Bridge and the Genesee Avenue/Governor Drive Grade Separation (no Genesee Avenue Widening);
6. Limited Roadway Changes (LRCA), which would construct an additional eastbound left-turn lane along the south-bound Genesee Avenue and Regents Road at their respective interchanges with SR52; and

¹ The RRBA would be over 1500 feet long, with the portion of the road on fill being 700 feet long and the span being 870 feet long. The maximum height of the bridge above the canyon floor would be 60 feet and the total width of the decks, including the 10-foot wide span between them, would be approximately 94 feet. The fill would be in a tributary canyon to Rose Creek and the coastal sage scrub on one of the slopes of this canyon supports one of the pairs of the California gnatcatchers that would be affected.

- 7. No Project, which would include none of the previous alternatives, but assumes the implementation of the: (a) roadway changes in the University City Facilities Benefit Assessment plan; (b) San Diego Association of Government’s revenue constrained 2030 Regional Transportation Plan improvements; (c) improvements to the La Jolla Village Drive / Interstate 805 interchange; (d) widening of Genesee Avenue from Regents Road to Interstate -5; and, (e) improvements to the Genesee Avenue / Interstate 5 interchange.

Alternatives 1 through 5 would include the project elements associated with the LRCA (i.e., alternative 6), and alternatives 1 through 6 are the action alternatives, as opposed to the No Project (i.e., no action) alternative.

Biological Impacts

Based on the DEIR and its associated biological resources report (Merkel & Associates, Inc. September 29, 2004, #02-099-01, Appendix C to the DEIR), biological impacts would occur with the implementation of the GAWA, the RRBA, and the combined GAWA/RRBA, all three of which include the roadway changes in the LRCA.

Portions of the study area are within the Multiple Habitat Planning Area (MHPA) of the City’s Multiple Species Conservation Program (MSCP) Subarea Plan. Specifically, these are Rose Canyon (Rose Canyon Open Space Park) and San Clemente Canyon (Marian Bear Memorial Natural Park), both of which would be affected by the RRBA and the GAWA.

The following table provides total proposed losses of habitats associated with the GAWA, RRBA, with the sensitive upland habitats broken out (i.e., in parentheses). The sensitive upland habitats that would be affected include Diegan coastal sage scrub, coast live oak woodland, native grassland, and non-native grassland. The wetland habitats that would be affected include southern cottonwood willow riparian forest, southern willow scrub, unvegetated waters of the U.S./streambed, coastal and valley freshwater marsh, and wet meadow.

Summary of Proposed Losses of Habitats in Acres¹						
	Wetlands^{2,4}		Uplands Within MHPA^{2,3}		Uplands Outside MHPA²	
	P	T	P	T	P	T
Genesee Avenue Widening	0.49	1.76	0.01 (0.003)	0.04 (0.04)	27.52 (1.39)	4.63 (3.58)
Regents Road Bridge	0.49 ⁵	1.40	1.89 (1.47)	6.4 (5.77)	4.82 (0.74)	2.29 (0.59)

1 Please see comment 2 on page 7 regarding impacts.
 2 P = permanent impacts; T= temporary impacts
 3 Numbers outside parentheses represent all habitats including sensitive habitats; numbers in parentheses represent only sensitive habitats.
 4 1.15 acres of the wetland impacts are associated with the LRCA, specifically the SR52/Genesee Avenue interchange.
 5 0.09 acre of this is southern willow scrub within a site of restoration conducted by the City with a 1997 Habitat Conservation Fund grant from the California Department of Parks and Recreation.

The DEIR identifies the sensitive species that would be directly (i.e., loss of habitat) and indirectly negatively affected by the action alternatives. The following table lists those species for the GAWA and the RRBA.

Subset of Species Observed Within the GAWA and RRBA Area of Potential Effect	
Genesee Avenue Widening Alternative	Regents Road Bridge Alternative
<p><u>would be directly affected</u></p> <ul style="list-style-type: none"> ➤ yellow warbler ➤ clay field goldenbush, CNPS List 1B <p><u>may be indirectly affected</u></p> <p>same species as listed under direct effects</p>	<p><u>would be directly affected</u></p> <ul style="list-style-type: none"> ➤ California gnatcatcher, possibly two pairs ➤ yellow-breasted chat ➤ California thrasher ➤ white-tailed kite ➤ clay field goldenbush, CNPS List 1B <p><u>may be indirectly affected</u></p> <p>same species as listed under direct effects, plus</p> <ul style="list-style-type: none"> ➤ bobcat ➤ coyote ➤ mule deer ➤ mountain lion ➤ Cooper's hawk ➤ red-shouldered hawk ➤ red-tailed hawk ➤ great horned owl ➤ barn owl ➤ yellow warbler, etc

Biological Mitigation

Among the City's proposed mitigation measures for impacts on biological resources are the following.

1. Mitigation for loss of habitat would occur at ratios consistent with the City's Biology Guidelines. Specific quantities of habitat creation, restoration, and preservation would depend on final engineering design.
2. The City would prepare a Wetland Mitigation Plan which would identify the exact amount and location of the impacted wetland habitat and identify the appropriate location for the wetland mitigation.
3. Engineering design would include measures to implement the City's MSCP Land Use Adjacency Guidelines.
4. Measures to avoid impacts during the avian breeding season, such as avoidance of removal of occupied habitat and controlling construction noise levels, would be implemented.
5. Measures to avoid impacts on nesting raptors would be implemented.
6. A survey for willoway monardella would be conducted prior to construction.

Traffic

The traffic study conducted for the DEIR modeled existing and future (year 2030) traffic conditions to determine the levels of service (LOS) of the Transportation Study's target road segments and intersections. Currently, two road segments within the study area operate at unacceptable LOS (i.e., LOS E or F). Both are on Miramar Road east of I-805, and are outside the study corridors (i.e., Regents Road and Genesee Avenue corridors). Currently, eight intersections within the study area operate at unacceptable levels. Five of these are outside of the study corridors. The following table provides the LOS of the no-project alternative, the LRCA alone, the GAWA alone, the RRBA alone, and a combination of the GAWA and RRBA, based on the modeling of the projected traffic in the year 2030.

Projected Unacceptable LOS for Year 2030		
	Road Segments	Intersections
No-Project	11	10
LRCA	11	10
GAWA	7	9
RRBA	9	9
GAWA & RRBA	7	7

As the table reflects, in 2030 the (a) no project alternative would result in having eleven road segments and ten intersections operating at unacceptable LOS, (b) LRCA along would result in having eleven road segments and ten intersections operating at unacceptable LOS, (c) GAWA alone would result in having seven road segments and nine intersections operating at unacceptable LOS, (d) RRBA alone would result in having nine road segments (seven of them the same as for the GAWA) and nine intersections (eight of them the same as the GAWA) operating at unacceptable LOS, and (e) combination of the GAWA and the RRBA would result in having seven road segments (same as for the GAWA) and seven intersections operating at unacceptable LOS.

WILDLIFE AGENCIES' COMMENTS

The comments provided herein are based on the information provided in the DEIR, the Wildlife Agencies' knowledge of sensitive and declining vegetation communities and species in the City, and our participation in regional conservation planning efforts. As the alternatives whose implementation would result in biological impacts are limited to the GAWA and the RRBA, both of which include the roadway changes in the LRCA, we restrict our comments to these alternatives.²

It is evident from the information provided in the project overview that, of the two action alternatives described, the GAWA would have substantially fewer and less significant biological impacts than the RRBA. The biological resources report states, the RRBA "would result in the

² We do not directly address the alternative that combines the GAWA and the RRBA. It is understood that the biological impacts associated with both alternatives would occur if the combination is implemented.

highest impacts to biological resources, and ultimately would result in the bulk of the mitigation requirements.” Of these two alternatives, the GAWA is also the alternative that would most effectively meet the project purpose.

If the City selects the RRBA or the GAWA for further consideration, additional environmental documentation should be prepared, and particularly for the RRBA, the Wildlife Agencies request that City coordinate with us regarding measures to avoid and minimize the biological impacts on the MHPA, the federally listed threatened California gnatcatcher (*Polioptila californica californica*) and other MSCP covered species, wetlands, and other sensitive habitats and species. At that time, we will discuss avoidance and minimization measures and measures necessary to adequately mitigate for the direct and indirect impacts of the RRBA or the GAWA. Therefore, we provide only limited recommendations in the letter about avoidance, minimization, or mitigation measures additional to those described in the DEIR. Our primary intent now is to discuss biological impacts which the DEIR either inappropriately dismissed as not significant or disregarded.

While the ensuing comments address the biological impacts associated primarily with the RRBA, we request that this not be construed as supportive of the implementation of the GAWA or any other alternative. The GAWA alternative would result in significant losses of wetlands, largely attributable to the construction associated with the LRCA (also common to the RRBA), and would also affect wildlife movement.

Direct Impacts

1. We recognize that the MSCP Subarea Plan allows for the placement of roads within the MHPA if they are identified in a community plan, as is the case for the Regents Road Bridge in the University Community Plan. Such roads must conform to the General Planning Policies and Design Guidelines in the Subarea Plan. Two of these Policies are that: (a) construction and maintenance activities in wildlife corridors must avoid significant disruption of corridor usage; and, (b) development in canyon bottoms should be avoided when feasible, and bridges are the preferred method for providing for wildlife movement.

The fundamental premise of the General Planning Policies and Design Guidelines is to avoid unnecessary substantial biological impacts within the MHPA. While they encourage the use of bridges instead of roads that traverse canyon floors, clearly, if there is one or more biologically preferable alternative that would meet or surpass the needs of a project for which a bridge is considered, that alternative would be the appropriate one to pursue relative to preserving the biological integrity of the MHPA. Such an alternative to the RRBA is the GAWA. Nevertheless, the DEIR is silent on the second Policy identified above despite the substantial potential direct and indirect negative biological impacts associated with the RRBA (see subsequent additional comments).

We disagree with the conclusion in the DEIR that the RRBA would be consistent with the first Policy. The RRBA would negatively affect a wildlife corridor and an extensive riparian woodland system, particularly during construction. Medium-to-large sized mammals

including coyote, bobcat, mule deer, and possibly mountain lion, currently utilize Rose Canyon. The magnitude and the duration of the staging, access, and construction activities would result in significant disruption of corridor usage by wildlife. For example, the entire wildlife corridor through Rose Canyon would be obstructed during the construction of the bridge (at least one year). The resulting disruption of wildlife movement would be a significant and unmitigable impact (biological resources report, page 77). However, this would be avoided if the RRBA were not built. The 8.29 acres of upland impacts on the MHPA would also be avoided. By comparison, the GAWA would affect an estimated 0.05 acre of upland habitat within the MHPA and not result in unmitigable significant impacts to a wildlife corridor.

2. We are concerned that the City Council will not have the correct information regarding the habitat losses associated with each action alternative. There are many discrepancies among the acreages of impacts in the tables in the DEIR and the biological resources report. We realize that the quantities of habitat losses could change with further engineering design. However, for the City Council to make an informed decision about which action alternative, if any, to consider further, they need to know the impacts determined to date.

Our understanding is that the GAWA and RRBA would include all the components of the LRCA (i.e., not that the GAWA would include only the LRCs at the SR52/Genesee Avenue interchange, and not that the RWBA would include only the LRCs at the SR52/Regents Road interchange) (page 3-36 of the DEIR). It appears that many of the acreage discrepancies derive from inconsistencies in how the impacts from the LRCA were accounted for in the GAWA and RRBA. It seems that in most, if not all, of the tables of habitat losses for the GAWA and RRBA, only some or none of the losses from the LRCA have been accounted for. For example, our interpretation of the approach used in the biological resources report to tally the impacts (page 3 of the report, under alternative 7) is that the impact acreages for the GAWA include the impacts from only the SR52/Genesee Avenue components of the LRCA, and the impact acreages for the RRBA include no impacts from the LRCA.

Just one example of the confusion about the proposed losses of habitat follows. Table 4.3-5 indicates that the combined temporary and permanent wetland impacts from the LRCA would be 1.23 acres. Therefore, since all the action alternatives would include all the components of the LRCA, the proposed wetland impacts for the GAWA and the RRBA should be at least 1.23 acres. While Table 4.3-7 indicates that the wetland impacts for the GAWA would be 2.27 (Department impacts), Table 4.3-9 indicates that the wetland impacts for the RRBA would be 1.33. Given that the wetland impacts from the construction of only the Regents Road Bridge would be 0.74 acre (Table 13 in the biological resources report), the impact of the RRBA would be at least the sum of 0.74 acre and 1.23 acres for a minimum total of 1.97 acres. Thus the value of 1.33 in Table 4.3-9 for impacts to wetlands from RRBA is incorrect.

The values in the table of habitat losses on page 3 of this letter are based on our efforts to reconcile the discrepancies in the DEIR and the biological resources report. Please note that 1.15 acres of the wetlands losses are attributable solely to the SR52/Genesee Avenue interchange component of the LRCA which is common to both the GAWA and the RRBA

(Table 4.3-5). We request that this matter of the acreages of habitat losses be resolved and the revised data be provided to the City Council before they consider the alternatives, so that they can have the information needed to make an informed decision. The final EIR should reconcile the discrepancies, and adjust the mitigation requirements as necessary, acknowledging that the mitigation for wetlands would ultimately be determined by the resource agencies in whose jurisdiction the wetland impacts occur.

3. The DEIR mentions the hydraulic constraint posed by the Genesee Avenue bridge over Rose Creek. Downstream of Genesee Avenue, the 100 year floodplain is approximately 70 feet wide, compared to 300 feet wide several hundred feet upstream. Under Genesee Avenue, Rose Creek is confined to box culverts subject to sediment accretion.³ The biological resources report indicates that wildlife passage in this area of Rose Canyon is also restricted under the bridge to an approximately 30-foot wide area north of and adjacent to the railroad tracks for a length of 94 feet (i.e., width of the bridge). The biological resources report and DEIR indicate that the GAWA would widen Genesee Avenue from 92 to 102 feet over the railroad tracks in Rose Canyon, and conclude that impacts resulting from the widening would be only incremental and would not add any new permanent significant impact. Given the already constrained space for wildlife movement in this area and the importance of maintaining adequate connections within open space areas and preserves to preserve biological diversity and population viability, we disagree with the conclusion that the incremental impacts would not be significant.

The current condition at the Genesee Avenue bridge over Rose Creek provides, at best, wildlife movement linkage between the west and east side of Genesee Avenue. It is a critical pinch point in the wildlife movement corridor extending through Rose Canyon between Interstate-5 and Genesee Avenue and on to the open space areas on the Marine Corps Air Station (MCAS) to the east. In turn, these areas on the MCAS provide wildlife movement corridors through to Mission Trails Regional Park, Sycamore Canyon County Park, Marian Bear Regional Park, and Los Penasquitos Canyon Preserve.

If the City selects the GAWA for further consideration, we recommend that the alternative be designed to replace the existing culverts with a design that is more conducive to wildlife passage and to reducing the hydraulic constraint. The MSCP Subarea Plan states, "If roads cross the MHPA, they should provide fully-functional wildlife movement capability." Implementation of the GAWA would be an ideal opportunity to greatly improve the wildlife movement linkage at this pinch point. In our NOP letter, we asked that the EIR describe how the box culverts under Genesee Avenue (now at least 94 feet long and proposed to be at least 104 feet long), would be improved for wildlife movement, and that the discussion of measures to improve the undercrossing include measures to attenuate noise from traffic. The DEIR addresses neither. Regardless of whether the City selects the GAWA to consider

³ A site visit on March 31, 2004, revealed that, though the box culverts are at least 6 feet high, at that time they had water in them except where sediment had collected. In some areas of sediment accretion, the sediment was so high as to dissuade or prevent wildlife (even small to medium-sized mammals) from passing through.

further, the culverts should be cleaned out on a regular basis so that they can provide optimal biological and hydraulic functions.

4. The DEIR indicates that project construction is expected to occur outside of the avian breeding season, thereby avoiding impacts on breeding behavior. The DEIR also indicates that the GAWA and the RRBA would take two years and one year, respectively, to construct. The final EIR should elaborate on the project duration. For example, please explain whether the one-year project construction period would actually be approximately 18 to 20 months to accommodate avoidance of avian breeding season (e.g., for raptors, February 1 through August 30). If the durations of project construction would be extended, consideration must be given to the increased duration of construction-related biological impacts such as impairment of wildlife movement through Rose Canyon in the area of the Regents Road bridge.
5. The RRBA would affect 0.09 acre of southern willow scrub within a site of restoration conducted by the City with funding from the California Department of Parks and Recreation (DPR) Habitat Conservation Fund Program (HCFP). This area is also within the MHPA. The DPR's procedural guide for the HCFP (May 1997), states, "applicant will maintain and operate the property acquired, developed, rehabilitated, or restored with the funds in perpetuity..... [and] make no other use, sale, or other disposition of the property except as authorized by specific act of the Legislature." In our NOP letter, we stated, "if the City committed to preserving the restoration in perpetuity, and the Regents Road Bridge alternative could not be designed to avoid (including shading and indirect impacts) the restoration area, the DEIR should explain why the [RRBA] is among the alternatives being studied." The DEIR does not respond to this query, and though it briefly describes the purpose of the restoration, it provides no justification for or evidence of being relieved from meeting DPR's requirements. We request that the City now respond to our query.
6. Considering that neither the types nor locations of the construction and post-construction best management practices (BMPs) have been determined, the losses of habitat are not entirely accounted for in the DEIR. We appreciate the general nature of this DEIR. However, it is unclear how the City Council will be fully informed to make a decision-about which alternative, if any, to consider further without knowing the habitat loss impacts. BMPs can occupy, and result in loss or degradation of habitat in, considerably large areas. Such potential losses are unaccounted for in the DEIR, as are also the potential impacts from the on-going long-term BMP maintenance which can be a source of disturbance (i.e., indirect effects) to sensitive wildlife species.

Edge Effects / Indirect Impacts

Generally, the DEIR does not adequately analyze the potential biological impacts from edge effects resulting from the RRBA. This alternative would introduce or exacerbate several potential indirect / edge effects into Rose Canyon where they either don't now exist or exist to a lesser degree than they would with the bridge. Edge effects are defined as undesirable anthropogenic disturbances beyond urban boundaries into potential reserve habitat (Kelly and

Rotenberry 1993). Edge effects, such as disturbance by humans, noise, and lighting, and decreases in avian productivity (Andren and Angelstam 1988), line-of sight disturbances, air- and water-borne contaminants associated with vehicles (air pollution can degrade vegetation), and fugitive dust during both construction and operation, are all documented effects that have negative impacts on sensitive biological resources in southern California. Edge effects can penetrate up to 200 meters from the actual reserve boundary (CBI 2000).

In part because the DEIR does not provide sufficient specific information about the RRBA, we are unable to demonstrate unequivocally that the edge effects we discuss below would, singly or in conjunction with each other, have significant impacts on sensitive wildlife species and the MHPA. However, considering the information in the following comments, we believe that there is ample reason for concern regarding the bridge's long-term biological impacts, and consider it likely that the edge effects of the RRBA would significantly compromise the biological integrity of Rose Canyon and the MHPA within it, and would significantly negatively affect the sensitive wildlife species that reside in or migrate through it. We must consider these impacts because we are responsible for the biological welfare of all species listed under the Migratory Bird Treaty Act, and other species of concern, including the MSCP-covered species, and partially responsible to protect the biological integrity of the MHPA. We recommend that the final EIR thoroughly address the ensuing issues we raise.

Noise

The DEIR states the following regarding the potential biological impacts from noise and lights.

Permanent, indirect impacts in the long-term, taking the form of noise and light (headlights at night), from the widened Genesee Avenue bridge would be additive to the current roadway use impacts, they would be incremental and would not be considered significant for the widening project (page 4.3-44).

Permanent, indirect impacts in the long-term, taking the form of noise and light (headlights at night) on the new bridge from the widened Regents Road Bridge would not be significant (page 4.3-52).

We agree with the conclusion regarding the significance of the incremental impacts from noise and light that would result from the GAWA. However, we disagree with the statement about the significance of the potential biological impacts of lighting (see next comment) and noise resulting from the RRBA, and believe that the following statement in the biological resources report more accurately reflects the potential impacts.

...lighting and noise could potentially have an indirect but significant impact on the wildlife in residence and moving through the canyon in the vicinity of the bridge (page 63).

The DEIR indicates that the area where the Regents Road bridge would be built would experience an increase of approximately 12 decibels A-weighted [dB(A)],⁴ from a predicted future No Project level of 59.6 dB(A) to future noise level with the bridge of 71.8 dB(A), and that the 65 dB(A) CNEL⁵ contour may extend as far as 240 feet from the centerline of the bridge in the residential areas north and south of Rose Canyon. In a condition where the roadway and receiver are at grade and the ground is vegetated, the 65 dB(A) CNEL contour distance would be 140 feet from the centerline when there is no intervening obstruction.⁶ The current peak hourly noise level on the canyon floor in this area, south of the tracks, is 55-56 dB(A) Leq. Preliminary research suggests that noise levels in excess of 60dB(A) L_{eq}⁷ hourly can adversely affect avian species such as the coastal California gnatcatcher (Awbrey 1993) and least Bell's vireo [(*Vireo bellii pusillus*: vireo) (Regional Environmental Consultants and San Diego Association of Governments 1990).⁸ Notwithstanding that the dB(A) and CNEL units of measure, or the thresholds typically used for human sensitivity, may not be appropriate for application to all sensitive wildlife receptors, we are concerned about the potential long-term biological impacts primarily on avian species in the canyon from the traffic-generated noise emanating from the bridge. The noise levels in the canyon would be higher than the levels provided above for the residential areas. Birds that now use the forest canopy and other lower vegetation (as the bridge descends towards its northern and southern termini) within 240 feet (or greater, depending on the noise levels in the canyon) of the bridge may abandon these habitats as a result of the increase in noise levels, either alone or in conjunction with other bridge-related impacts (e.g., lights, line-of-sight disturbances), or minimally no longer use the habitat during the breeding season.

Avian hearing is critical for mate selection, territorial defense, and predator selection. Sound distortion may make it hard for prospective mates to determine the quality of others' songs. This may make females tend to choose mates from less noisy areas, affecting nesting patterns. Noise in excess of 60 dB(A) L_{eq} can mask the song of a male birds, thereby inhibiting his chance of attracting a mate. Reduced communication distance may make it harder to locate mates or make prospective mates perceive the calls of suitors as weaker than those of suitors in less noisy areas. It also reduces the area a bird can effectively defend, making the bird less attractive as a resource

⁴ A-weighting refers to an electronic filter applied to sound pressure level measurements. It discriminates against low frequencies so that the sound measurements correspond more closely to the response of human hearing to many types of noise.

⁵ Community noise equivalent level: Twenty-four-hour average A-weighted sound level for a given day, after addition of five decibels to sound levels between 1900 and 2200 hours, and ten decibels to sound levels between 0000 and 0700 hours and between 2200 and 2400 hours.

⁶ Elsewhere, the DEIR indicates that traffic noise levels on the canyon floor would not exceed 60 dB(A) Leq (page 5.3-52). However, no explanation as to how this is derived is provided.

⁷ Leq = equivalent noise level. The Leq is a hypothetical steady state noise level that in a stated period of time contains the same average A-weighted noise energy as a measured varying sound at the stated level.

⁸ We acknowledge that vireo were not detected during surveys conducted in the Rose Canyon study area. We include them here only for purposes of illustration.

provider. Noise can also mask the vocalizations of vireos signaling the presence of a predator (Regional Environmental Consultants and San Diego Association of Governments 1990). Furthermore, energetic costs from behaviors associated with noise may lead to a reduction in weight gain (Ward and Stehn 1989), which may decrease reproductive fitness. Noise may also result in immediate and long-term behavioral responses (e.g., flushing vs. permanent abandonment of an area), acute and/or chronic physiological responses (e.g., heart rate increase vs. increases in the release of adrenocorticotrophic hormone; fluctuating asymmetry, Palmer 1996), or demographic parameters (e.g., survival or reproduction).

The lowest sections of the bridge would be near the California gnatcatcher habitat which would be subject to considerable increases in operational (i.e., traffic) noise during the breeding season. We are concerned that, if the species persists in these territories throughout the construction period, the noise generated by traffic during the breeding season may cause gnatcatchers to abandon their territories, or may diminish breeding success. As these territories are within the MHPA, we would consider such loss unnecessary because other alternatives exist that avoid take of this species. Individuals of all the species listed in the table on page 3 might be similarly affected, including the Cooper's hawk, an MSCP-covered species, and the other raptorial species.

Lighting

The DEIR states the following regarding the potential biological impacts from lights.

Mitigation for alternatives that include the Regents Road Bridge require lights on the bridge to be shielded such that light would be directed away from the MHPA (page 4.3-53).

With the MHPA and sensitive habitats surrounding the Regents Road Bridge, it would be difficult, if not impossible, to orient the lights on the bridge in a manner that obstructs all light from reaching the wildlife that resides there. And, while the proposed barriers on both sides of the Regents Road Bridge would shield headlights from the canyon floor, as suggested in the DEIR, the glow cast from the headlights and the lights on the bridge would spill into the sensitive habitats. In an area that now experiences minimal urban lighting (sky glow) and no direct lighting, this would likely constitute a significant biological impact, as discussed below.

Illumination of riparian corridors by night lighting has the potential to adversely affect birds. Physiological, developmental, and behavioral effects of light intensity, wavelength, and photoperiod on bird species are well-documented. In the wild, urban lighting is associated with early daily initiation of avian song activity (Bergen and Abs 1997). Avian species are known to place their nests significantly farther from motorway lights than from unlighted controls (de Molenar et al, 2000). Placement of nests away from lighted areas implies that artificial light renders part of the home range less suitable for nesting. If potential nest sites are limited within the bird's home range, reduction in available sites associated with artificial night lighting may cause the bird to use a suboptimal nest site that is more vulnerable to predation, cowbird

parasitism,⁹ or extremes of weather. Artificial lighting generally threatens wildlife by disrupting biological rhythms and otherwise interfering with the behavior of nocturnal animals (contributions from Artificial Night Lighting Conference, 2002). Nocturnal and migrating birds, migrating bats, insects, fish, and amphibians are particularly affected by artificial night lighting (Evans Ogden 1996 and citations therein). Billions of moths and other insects are killed from lights each year. Nocturnal birds use the stars and moon for navigation during migrations. When these birds fly through a brightly lit area, they can become disoriented, which can lead to injury and/or death. In addition, artificial lighting can affect aquatic invertebrates that are prey for other animals. Other references that may provide useful insight into the analysis of indirect impacts include Longcore and Rich (2001) and the National Cooperative Highway Research Program (2002).

Other Indirect Impacts

Other potentially significant indirect biological impacts associated with RRBA about which we are concerned include avian collisions with vehicles on the bridge and hydrological modifications of Rose Creek and its floodplain during and after construction. We recommend that the final EIR fully evaluate and disclose these impacts.

Mitigation

Again, if the City selects the RRBA or GAWA for further consideration, the Wildlife Agencies request that City coordinate with us regarding measures to avoid and minimize the biological impacts on the MHPA, California gnatcatcher and other MSCP covered species, wetlands, and other sensitive habitats and species. At that time, we will discuss measures necessary to adequately mitigate for the direct and indirect impacts of the RRBA or GAWA. Our preliminary comments on the proposed mitigation follow.

1. We are concerned about the difficulty of finding adequate mitigation sites for the amount of wetland mitigation that would be needed for the GAWA and/or the RRBA. The DEIR provides no details about where the mitigation might occur. We agree with, and incorporate by reference, the Regional Water Quality Control Board's comments (February 28, 2005, letter on the DEIR) regarding the inappropriate deferral of identifying specific mitigation measures, as the comments apply to the omission of adequate specific information on mitigation sites for habitat losses.
2. If the proposed mitigation could cause biological impacts (e.g., removal of sensitive upland habitats for the creation of wetlands), additional CEQA analysis and review would be warranted [CEQA Guidelines, section 15126.4(a)(D)], and additional mitigation may be necessary. Again, it is unclear how the City Council will be fully informed to make a decision-about which alternative, if any, to select without this information.

⁹ Brown-headed cowbirds were observed in the proximity of the Regents Road Bridge.

3. The DEIR indicates that the mitigation for the temporary loss of wetlands would be at a ratio of 1:1. It is likely that the Department will require at least a 2:1 ratio for the temporary losses of wetlands, particularly considering the duration and nature of the temporary losses. For example, the construction access and staging areas for the RRBA would disrupt the functions and values of the mainstem of Rose Creek and its associated riparian habitat during the construction of the RRBA, which would last at least one year.
4. Depending on the duration of the temporary loss of coastal sage scrub and other sensitive upland habitats, particularly within the MHPA, it may be appropriate to mitigate at a ratio greater than 1:1 and to fulfill any off-site mitigation requirement prior to or during project-construction.
5. The final EIR should require and fully describe methods to attenuate project-related construction and operational noise levels in excess of ambient levels at the edge of sensitive habitats to avoid or minimize further degradation of habitat for wildlife, particularly avian species.
6. The proposed mitigation measure to protect raptors during the breeding season may be insufficient. In southern California, Cooper's hawks are known to lay their eggs as early as the end of January (Unitt 2004), which indicates that they start building their nests earlier. Therefore, since this species likely nests on site (page 22 of the biological resources report), the construction avoidance period should be adjusted to begin at the latest by January 1. In addition, the MSCP Subarea Plan requires that area specific management directives for the Cooper's hawk must include a 300-foot impact avoidance areas around active nests and minimization of disturbance in oak woodlands and oak riparian forests.¹⁰ These requirements apply to both construction and post-construction (i.e., once the bridge is being used) impacts.

Conclusion

Based on the preceding discussion, we strongly recommend that the City eliminate the RRBA from further consideration as a viable alternative to address the traffic congestion in the University City North / South Transportation corridor. Accordingly, the City should process an amendment to the University Community Plan to remove this bridge from the Plan's Transportation Element.

It remains for the City to determine whether the improvement in traffic congestion provided by any of action alternatives studied to date warrants the associated loss of sensitive biological resources and the fiscal expense, inclusive of the cost of biological mitigation. Assuming that the methodology used to model the 2030 traffic conditions is valid, it is evident from the modeling results provided in the DEIR that the GAWA would be the most effective action alternative to address traffic congestion in the study corridor. While the combination of the GAWA and the RRBA would provide two more intersections that operate at acceptable LOS

¹⁰ It is not clear from the DEIR where Cooper's hawks occur in Rose Canyon relative to the RRBA alignment.

than would the GAWA alone, the economic and biological impacts associated with the combination may render its implementation prohibitive.

We appreciate the opportunity to comment on the DEIR. The Department finds that the implementation of any of the action alternatives would not be de minimis in its effects on fish and wildlife per section 711.4 of the California Fish and Game Code. Please contact Carolyn Lieberman of the Service at (760) 431-9440, or Libby Lucas of the Department at (858) 467-4230, if you have any questions or comments concerning this letter.

Sincerely,

Therese O'Rourke
Assistant Field Supervisor
U.S. Fish and Wildlife Service

Donald Chadwick
Habitat Conservation Planning Supervisor
South Coast Region
California Department of Fish and Game

cc: Department of Fish and Game (Kelly Fisher)
Regional Water Quality Control Board (Stacey Baczkowski)
State Clearinghouse
U.S. Army Corps of Engineers (Terrence Dean)

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In Reply Refer to:
FWS-SDG-3970.3

July 31, 2006

Ms. Martha Blake, Associate Planner
City of San Diego
Development Services Department
1222 First Avenue, MS 501
San Diego California 92101

Re: University City North/South Transportation Corridor Study

Dear Ms. Blake:

The U.S. Fish and Wildlife Service and the California Department of Fish and Game have reviewed the City's response to our comments (RTCs) on the draft Environmental Impact Report (EIR) for the University City North/South Transportation Corridor Study (Transportation Study). We understand that tomorrow the City Council will consider whether to certify the final EIR for the subject project and whether to select the Regents Road Bridge Alternative (RRBA) and initiate an amendment to remove the Genesee Avenue Widening Alternative (GAWA) from the University Community Plan. We find that the RTCs underscore our previous assessment that, because of its inadequacy, the EIR should not be certified. The RTCs also reinforce our previous recommendation that the City eliminate the RRBA (i.e., not the GAWA) from further consideration as a viable alternative to address traffic congestion in the UC North/South Transportation corridor (April 14, 2005, comment letter on the draft EIR, copy attached). Accordingly, the City should instead process an amendment to the University Community Plan to remove the bridge from the University Community Plan.

The July 26, 2006, staff Report to City Council on the RRBA seriously minimizes the biological implications of this alternative. One of the inadequate aspects of the biological impact analysis of the alternatives in the EIR is the consideration of their effects on the Multiple Habitat Planning Area (MHPA) of the City's Multiple Species Conservation Program Subarea Plan (MSCP SAP). In addition, the EIR and the RTCs fail to acknowledge that, while new roads are allowed in the MHPA, the MSCP SAP pre-supposes the selection of alternatives that satisfy the project purpose and meet the intent of the MSCP. The fundamental premise of the MSCP's General Planning Policies and Design Guidelines (Policies and Guidelines) is to avoid unnecessary substantial biological impacts within the MHPA. While they encourage the use of bridges instead of roads that traverse canyon floors, the Policies and Guidelines also require that if there is one or more biologically preferable alternative that would meet or surpass the needs of a project for which a bridge is considered, that alternative should be chosen to preserve the biological integrity of the MHPA. Such an alternative to the RRBA is the GAWA. Unfortunately, the DEIR is silent on this matter.

It is evident that the GAWA would have substantially fewer and less significant biological impacts than the RRBA, beyond those associated strictly with the MHPA. And, of these two

Ms. Martha Blake (FWS-SDG-3970.3)

2

alternatives, the results (see table below) of the City's traffic analysis indicate that the GAWA is also the alternative that would singly best meet the project purpose, if the purpose is to relieve traffic congestion, in particular, within and between the southern and northern portions of the community of University City.^{1,2} If however, the project purpose is different from that presented in the EIR, the City should formally revise it. It is important to note that the City is not obligated to select any alternative (RTC #2.29). Any improvement in traffic gained from any of the alternatives would be so marginal that it begs the question whether any would sufficiently meet the project purpose to warrant the associated expenditure of funds for its implementation.

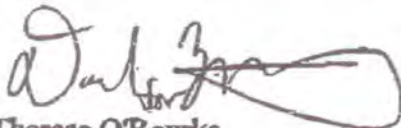
Projected Unacceptable Levels of Service for Year 2030		
	Road Segments	Intersections
No-Project	11	10
GAWA	7	9
RRBA	9	9
GAWA & RRBA	7	7

The July 26 staff Report to City Council states that the primary goal of the approach taken in the EIR "was to allow decision-makers to select an alternative based on a comparison of environmental consequences combined with social and economic factors associated with each alternative." However, the City's finding (Candidate Findings, page 41) that the GAWA is infeasible undermines the credibility of this approach and represents a contravention of CEQA which requires that alternatives be feasible (CEQA Guidelines Section 15126.6).

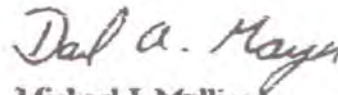
The City has prepared a statement of overriding considerations, though its propriety is questionable given the inadequacy of the EIR. However, there is no such relief mechanism available to the City for its obligations under the MSCP, and it is not apparent to us how the City will make the MSCP findings required to proceed with the RRBA.

In conclusion, if the City decides to implement any of the alternatives in the EIR, to be consistent with the City's MSCP SAP, it should be the GAWA. We appreciate the opportunity to comment on the subject project and the City Council's related pending considerations. Please contact Libby Lucas of the Department at (858) 467-4230 or Carolyn Lieberman of the Service at (760) 431-9440 if you have any questions or comments concerning this letter.

Sincerely,



Therese O'Rourke
Assistant Field Supervisor
U.S. Fish and Wildlife Service



FOR

Michael J. Mulligan
Deputy Regional Manager
California Department of Fish and Game

¹ This statement of project purpose is based on the DEIR and the purpose as described to us when we met with the City on December 9, 2003.

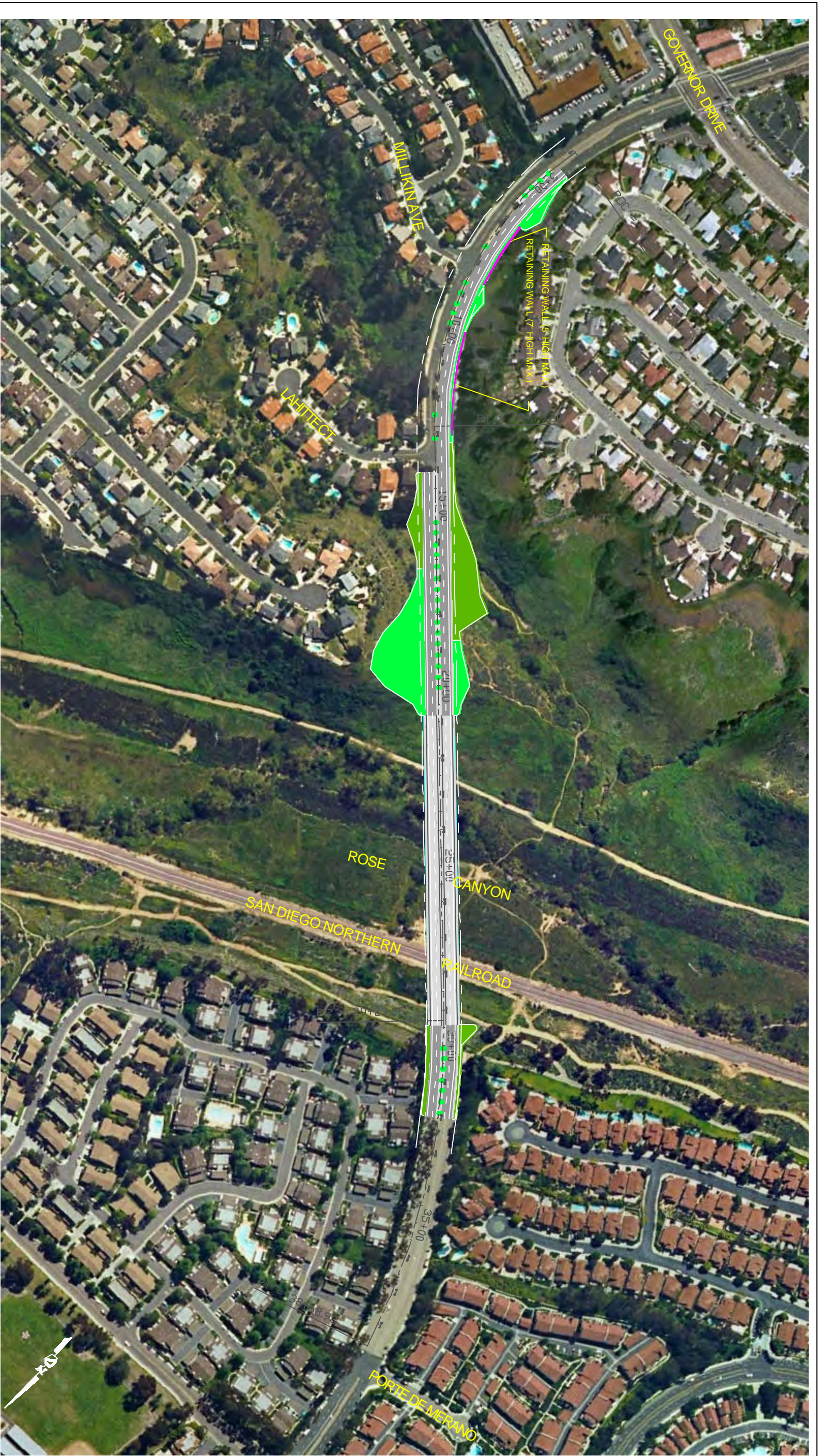
² Our comment is not intended to be interpreted as confirmation that there is a need for traffic relief, and assumes that the methodology used to model the 2030 traffic conditions is valid. As we did not review the final EIR, we are not certain that these numbers have remained the same as in the draft EIR. However, the City's response to our comments did not indicate that this summary is incorrect. The main portion of the July 26, 2006, staff Report to City Council omits the results of the study, though the Candidate Findings briefly assess them (page 4-1).

From: [Friends of Rose Canyon](#)
To: [PLN PlanningCEQA](#)
Subject: University Community Plan Amendment - Att. 12
Date: Monday, January 04, 2016 4:41:16 PM
Attachments: [12. REGENTS Cut and Fill UCNSTCS.pdf](#)
Importance: High

Dear Ms. Morrison,

Here is Att. 12 (of 20) for Friends of Rose Canyon's Scoping Comments.

Deborah Knight
Friends of Rose Canyon
858-597-0220



REGENTS ROAD BRIDGE

SCALE: 1"=80'

LEGEND	
	BRIDGE SPAN
	ROAD PAVEMENT
	SIDEWALK
	MEDIAN
	RETAINING WALL
	RIGHT OF WAY
	FILL SLOPES
	CUT SLOPES



GRAPHICAL SCALE

Project Design Consultants
 17500 Via Arroyo, Suite 200
 San Diego, CA 92128
 Tel: 619.481.1234
 Fax: 619.481.1235
 www.projectdesign.com



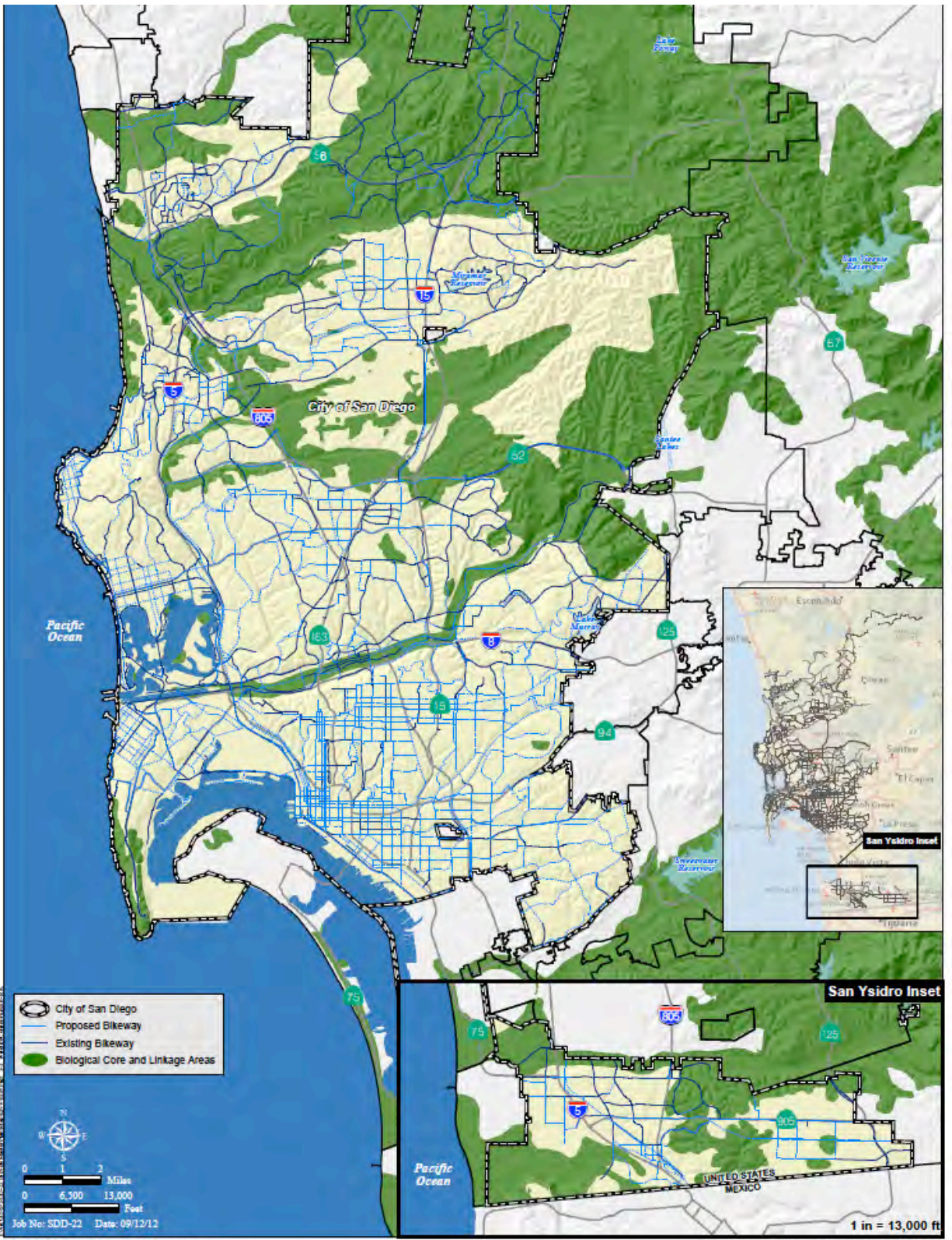
From: [Friends of Rose Canyon](#)
To: [PLN PlanningCEQA](#)
Subject: University Community Plan Amendment - Att. 13-14
Date: Monday, January 04, 2016 4:44:17 PM
Attachments: [13. CitySANDAG Wildlife Corridors.pdf](#)
[14. RC Transect GoogleEarth Image.jpg](#)
Importance: High

Dear Ms. Morrison,

Here are attachments 13-14 for Friends of Rose Canyon's Scoping Comments.

Deborah Knight
Friends of Rose Canyon
858-597-0220





Wildlife Corridors
Figure 5.1-3

Source: City of San Diego and SANDAG

From: [Friends of Rose Canyon](#)
To: [PLN PlanningCEQA](#)
Subject: University Community Plan Amendment - Att. 15-16
Date: Monday, January 04, 2016 4:47:22 PM
Attachments: [15. Tracking Team Data 2003-2007.pdf](#)
[16. Tracking Team Data 2007-2014.pdf](#)
Importance: High

Dear Ms. Morrison,

Here are Attachments 15 and 16 for Friends of Rose Canyon's Scoping Comments.

Deborah Knight
Friends of Rose Canyon
858-597-0220

San Diego Tracking Team

Rose Canyon Transect: See attached map for location of transect

Table derived from our October 2003 to December 2007 data base that shows our list of species and the average number of observations (tracks, scat, etc.) on each per quarter. So, on the average, we found evidence of bobcat 6.5 times each survey. We never found evidence of mule deer. Etc. (Note that this does not mean we found evidence of 6.5 bobcats. The evidence could be from one or more individuals; our data doesn't support population size estimates.) More recent surveys have been consistent with this data set.

Species	No. of Obs. Per Quarter
Badger	0.0
Black Tailed Jackrabbit	0.0
Bobcat	6.5
Cougar	0.0
Coyote	23.1
Gray Fox	0.6
Long Tailed Weasel	0.0
Mule Deer	0.0
Opossum	1.2
Raccoon	4.9
Ringtail	0.0
Roadrunner	0.0
Spotted Skunk	0.0
Woodrat/Packrat	4.8



From: [Friends of Rose Canyon](#)
To: [PLN_PlanningCEQA](#)
Subject: University Community Plan Amendment - Att 17-20
Date: Monday, January 04, 2016 4:49:37 PM
Attachments: [17. Relative sensitivities.pdf](#)
[18. Letter from CA State Pks.pdf](#)
[20. RWOCB UCNSTCS DEIR Letter.pdf](#)
[19. RWOCB UCNSTCS comment FEIR.pdf](#)
Importance: High

Dear Ms. Morrison,

Here are Attachments 17-20 for Friends of Rose Canyon's Scoping Comments.

Deborah Knight
Friends of Rose Canyon
858-597-0220

Relative Sensitivities of Mammalian Carnivores to Habitat Fragmentation

KEVIN R. CROOKS*

Department of Biology, University of California, Santa Cruz, CA 95064, U.S.A.

Abstract: *I examined the effects of habitat fragmentation on the distribution and abundance of mammalian carnivores in coastal southern California and tested the prediction that responses to fragmentation varied with the body size of carnivore species. I conducted track surveys for nine native and two exotic carnivore species in 29 urban habitat fragments and 10 control sites. Fragment area and isolation were the two strongest landscape descriptors of predator distribution and abundance. Six species were sensitive to fragmentation, generally disappearing as habitat patches became smaller and more isolated; three species were enhanced by fragmentation, with increased abundance in highly fragmented sites; and two species were tolerant of fragmentation, with little to no effect of landscape variables on their distribution and abundance. Within urban habitat fragments, the carnivore visitation rate increased at sites with more exotic cover and closer to the urban edge, a pattern driven largely by the increased abundance of fragmentation-enhanced carnivores at edge sites. Finally, body size, in conjunction with other ecological characteristics, partially accounted for the heterogeneity in responses to fragmentation among carnivore species. These differential sensitivities are useful criteria for choosing appropriate focal species for ecological research and conservation planning, a choice that depends on the scale of fragmentation in a region and the commensurate responses of carnivore populations at that scale.*

Sensibilidad Relativa a la Fragmentación del Hábitat de Mamíferos Carnívoros

Resumen: *Examiné los efectos de la fragmentación del hábitat sobre la distribución y abundancia de mamíferos carnívoros en la costa del sur de California y evalué la predicción de que las respuestas a la fragmentación variaban con el tamaño corporal de carnívoros. Se realizaron muestreos de huellas para nueve especies nativas y dos exóticas en 29 fragmentos de hábitat urbano y 10 sitios control. El área fragmentada y su aislamiento fueron los dos principales descriptores de la distribución y abundancia de depredadores. Seis especies fueron sensibles a la fragmentación, generalmente las especies desaparecían conforme los fragmentos eran más pequeños y aislados, tres especies fueron favorecidas por la fragmentación, con incremento en su abundancia en sitios altamente fragmentados, y dos especies fueron tolerantes a la fragmentación con poco o ningún efecto de las variables del paisaje sobre su distribución y abundancia. Dentro de los fragmentos de hábitat urbano, las tasas de presencia de carnívoros incrementaron en sitios con mayor cobertura exótica y cercanos al borde urbano, un patrón dirigido principalmente por el incremento en la abundancia de carnívoros favorecidos por la fragmentación en el borde de los sitios. Finalmente, el tamaño corporal, conjuntamente con otras características ecológicas, fueron parcialmente responsables de la heterogeneidad en respuestas a la fragmentación entre especies de carnívoros. Estas sensibilidades diferenciales son un criterio útil para seleccionar especies focales apropiadas para investigaciones ecológicas y la planeación de la conservación, una selección que depende de la escala de fragmentación en una región y de las respuestas apropiadas de las poblaciones de carnívoros a esa escala.*

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Paper submitted September 12, 2000; revised manuscript accepted May 30, 2001.

Introduction

The destruction of habitat has been targeted as one of the most serious threats to biological diversity world-

wide (Wilcove et al. 1998), and in areas with increasing urbanization, the loss and fragmentation of habitat is virtually inevitable. Mediterranean scrub habitats in coastal southern California are particularly threatened. Intensive development in the region over the past century has destroyed all but 10% of the native coastal sage scrub habitat (McCaufl 1994). This habitat loss has created a "hotspot" of endangerment and extinction for the highly endemic biota in the region (Dobson et al. 1997). Mammalian carnivores are thought to be particularly vulnerable to local extinction in fragmented landscapes because of their relatively large ranges, low numbers, and direct persecution by humans (Noss et al. 1996; Woodroffe & Ginsberg 1998). The decline and extirpation of top predators from fragmented systems may generate trophic cascades that alter the structure of ecological communities (Crooks & Soulé 1999). Indeed, the persistence of these environmentally sensitive and ecologically pivotal species may be indicative of the integrity of entire ecosystems (Noss et al. 1996). As such, mammalian carnivores can serve as useful tools for the study of ecological disturbances or for conservation planning and reserve design (Soulé & Terborgh 1999).

Mammalian predators are difficult to study, however, because of their low densities, nocturnal and secretive habits, and wariness of humans (Sargeant et al. 1998). As a result, the ecology of many carnivore species and their responses to ecological disturbances such as fragmentation are often poorly understood. Although considered members of the same ecological guild, carnivores may vary in their responses to fragmentation. In particular, differences in body size among carnivore species have been proposed as an important determinant of extinction probability (Brown 1986; Belovsky 1987). The relationship between body size and extinction risk in animals is complex, however, and has been the subject of considerable debate, with studies predicting and reporting positive, negative, or no relation of body size to extinction probability (reviewed by Johst & Brandl 1997). Few studies have evaluated if, how, or why carnivore species differ in their relative sensitivities to fragmentation effects.

My goal was to analyze the effects of the loss and fragmentation of habitat on mammalian carnivores in the urbanizing landscape of coastal southern California. Habitat fragmentation must be viewed as a multiscale problem, with fragmentation effects depending on the scale of fragmentation and the movement patterns of target species (Andren 1994). I therefore surveyed a suite of carnivore species that occur across a range of fragmentation levels and evaluated their responses to fragmentation at two spatial scales: (1) landscape-level heterogeneity among fragments and (2) local heterogeneity at sites within fragments. To allow for a more comprehensive assessment of relative sensitivities to fragmentation, I not only documented the presence or absence of

each carnivore species, but also measured their relative abundance at each site. Finally, I tested the prediction that responses to fragmentation vary with body size in carnivore species, explored other ecological traits of these predators that may contribute to extinction risk, and used these differential sensitivities to evaluate the utility of mammalian carnivores as focal species with which to assess the degree of functional landscape connectivity.

Methods

Study Areas

I conducted carnivore surveys in 29 urban habitat fragments in coastal San Diego County from Fall 1995 through Summer 1997. Twenty-eight of these fragments were originally studied by Soulé et al. (1988). The fragments, completely surrounded by human-modified landscapes, are typically dendritic canyons dissecting coastal mesas, although a few also contain mesa-top habitat. The fragments support a mosaic of shrub habitat, including mixed chaparral, chamise chaparral, maritime succulent shrub, and coastal sage scrub, the dominant assemblage in most sites. Disturbed areas within fragments were typically dominated by ruderal weed species, ornamental plants invading from surrounding residences, fire-retardant ground cover such as South African ice-plant (*Carpobrotus edulis*), and non-native trees (e.g., palms and species of *Eucalyptus* and *Acacia*) (Alberts et al. 1993).

From Fall 1995 through Summer 2000, I conducted carnivore surveys in less disturbed areas in coastal southern California to act as controls to the small, urban habitat remnants. These control areas varied in size and degree of isolation (Table 1), ranging from relatively small reserves isolated within urban developments (e.g., Point Loma Ecological Reserve) to large blocks of habitat relatively continuous with larger natural areas (e.g., Miramar Marine Corps Air Station).

Carnivore Surveys

I assessed the distribution and relative abundance of nine native and two non-native predator species through track surveys. Native species were the mountain lion (*Felis concolor*), bobcat (*Felis rufus*), coyote (*Canis latrans*), gray fox (*Urocyon cinereoargenteus*), badger (*Taxidea taxus*), raccoon (*Procyon lotor*), striped skunk (*Mephitis mephitis*), western spotted skunk (*Spilogale gracilis*), and long-tailed weasel (*Mustela frenata*). Non-native target species were the domestic cat (*Felis catus*) and Virginia opossum (*Didelphis virginiana*), a marsupial introduced to California around 1910 (Jameson & Peeters 1988).

Table 1. Landscape variables and distributions of 11 mammalian carnivore species for 10 control sites and 29 urban habitat fragments in coastal southern California (1, present; 0, absent).

	Area (ha)	Age (yrs)	Distance Y (m)	Distance Z (m)	Long-tailed weasel	Spotted skunk	Badger	Mountain lion	Bobcat	Coyote	Gray fox	Striped skunk	Raccoon	Opossum	Domestic cat
Control sites															
Miramar Marine Corps Air Station	5806	0	0	0	0	0	0	1	1	1	0	1	1	1	0
Chino Hills State Park	4452	0	200	200	1	0	1	1	1	1	1	1	1	1	0
Limestone Canyon/Whiting Ranch	4450	0	15	15	0	0	1	1	1	1	1	1	1	1	0
San Joaquin Hills	4219	22	5353	2930	0	1	0	0	1	1	1	1	1	1	0
Weir Canyon	1923	0	69	69	0	0	0	1	1	1	1	1	0	1	0
Santa Margarita Ecological Reserve	1763	0	30	30	0	0	0	1	1	1	1	0	1	0	0
Starr Ranch	1548	0	0	0	0	1	0	1	1	1	1	1	1	1	0
Tenaja	1191	0	0	0	1	0	1	1	1	1	1	1	1	1	0
Torrey Pines State Reserve	428	0	68	68	0	0	0	0	1	1	1	1	1	1	0
Point Loma Ecological Reserve	264	45	5700	5700	0	0	0	0	0	1	1	1	1	0	1
Urban fragments															
Florida	102	59	2100	233	0	0	0	0	0	1	1	0	0	0	0
Torrey Pines Extension	74	20	91	91	0	0	0	0	1	1	1	1	1	1	1
Balboa Terrace	56	43	121	117	0	0	0	0	0	1	1	1	1	1	1
Alta La Jolla	34	23	121	93	0	0	0	0	0	1	1	1	1	1	1
Kate Sessions	31	25	121	93	0	0	0	0	0	1	1	1	1	1	1
Zena	15	45	2865	467	0	0	0	0	0	1	1	1	0	1	1
Canon	12	67	1219	1167	0	0	0	0	0	0	1	1	1	1	1
Laurel	10	88	1554	350	0	0	0	0	0	1	1	1	1	1	1
32nd Street South	10	65	304	233	0	0	0	0	0	1	0	0	0	0	1
Pottery	10	23	45	70	0	0	0	0	0	1	1	1	1	1	0
Washington	9	83	365	187	0	0	0	0	0	1	1	1	1	1	1
Syracuse	9	27	40	70	0	0	0	0	0	1	1	1	0	1	1
Baja	8	40	670	70	0	0	0	0	0	1	1	1	1	1	1
Raffee	8	28	61	163	0	0	0	0	0	1	1	1	1	1	1
Solana	8	20	550	187	0	0	0	0	0	1	1	0	1	1	0
Acuna	7	31	110	47	0	0	0	0	0	1	1	1	0	1	1
Juan	7	32	228	70	0	0	0	0	0	1	1	1	1	1	1
Chollas	6	45	1005	467	0	0	0	0	0	1	1	1	1	1	1
Mil Cumbres	6	20	550	23	0	0	0	0	0	1	1	1	0	1	1
Chateau	6	29	110	47	0	0	0	0	0	1	1	0	0	1	1
Oak Crest	6	15	400	140	0	0	0	0	0	1	0	0	0	1	1
54th	4	29	609	187	0	0	0	0	0	1	1	1	1	1	1
60th	4	46	335	350	0	0	0	0	0	1	0	0	0	1	0
Spruce	4	95	1767	93	0	0	0	0	0	1	1	1	1	1	1
Titus	3	86	280	163	0	0	0	0	0	1	1	1	1	1	1
Montanosa	3	11	91	93	0	0	0	0	0	1	0	0	0	1	1
El Mac	2	41	883	163	0	0	0	0	0	1	1	1	1	0	1
Poinsettia	2	59	350	350	0	0	0	0	0	0	1	0	1	1	1
Talbot	2	64	1219	933	0	0	0	0	0	0	1	1	1	1	1
Urban fragment occupancy					2	2	3	7	11	36	34	21	19	26	25
Total occupancy					2	2	3	7	11	36	34	21	19	26	25

I established a series of track-detection stations at approximately 250-m intervals along dirt roads or trails (human and/or wildlife) along the main axis of each study area (Linhart & Knowlton 1975; Conner et al. 1983; Sargeant et al. 1998). Each track station consisted of a 1-m-diameter, 1-cm-deep, circle of freshly sifted gypsum baited with a liquid carnivore scent lure (Russ Carman's Pro-Choice and Canine Call, Sterling Fur & Tool, Sterling, Ohio) every other day. Track transects were checked and reset daily for 5 consecutive days. Tracks on each station were measured and identified to species; tracks with ambiguous identifications were omitted from analyses. Track surveys were conducted once each sampling quarter: fall (September–November), winter (December–February), spring (March–May), and summer (June–August). Each site was sampled for 1–2 years.

The track index of each carnivore species in each quarterly sampling session was expressed as the total number of visits recorded for a species, divided by the total sampling effort. I defined a visit as at least one track of a species on a track station (Conner et al. 1983). Mathematically, the track index (I) was calculated as

$$I = \ln[\{v_j/(s_j n_j)\} + 1],$$

where v_j is the number of stations visited by a species in transect j , s_j is the number of stations in transect j , and n_j is the number of nights that stations were operative in transect j . Thus, I for each species represents the visitation rate per track station per night in each study area. Although this index cannot be directly translated into numbers of individuals and hence does not measure absolute densities, it does provide an index of the relative abundance of a species at each sampling point (Conner et al. 1983; Sargeant et al. 1998). For each species, I averaged track indices across quarterly sampling sessions to derive a mean index at each study area for the duration of the study. Indices were log-transformed to meet normality assumptions in the statistical analyses. Overall, track surveys totaled 6540 station-nights ($s_j n_j$) among all study sites.

Landscape Variables

I used area, age, and isolation to assess the effects of landscape-level fragmentation on carnivore populations (Table 1). I measured the total area of each fragment based on digitized images of scaled aerial photographs taken in 1995. Total area of each control site was defined as the reserve boundaries within which the surveys were conducted. Because control sites were often adjacent to unfragmented habitat, area approximations represent minimum estimates.

Fragment age, defined as the number of years since isolation of the habitat fragment by urban development, was based on dated aerial photographs and building permit records (Soulé et al. 1988). Because fragment age is

highly negatively correlated to the proportion of native shrub cover within fragments (Suarez et al. 1998; Crooks et al. 2001), I used age to measure a time effect per se in the fragments and to represent the cumulative loss of native habitat in the entire fragment since isolation. Age was scored as zero for control sites that were directly adjacent to larger natural areas (Miramar Marine Corps Air Station, Starr Ranch Audubon Sanctuary, Tenaja Corridor) or that were separated from such areas by only a roadway and not by urban development (Chino Hills State Parks, Limestone Canyon/Whiting Ranch, Santa Margarita Ecological Reserve, Torrey Pines State Reserve, Weir Canyon).

Two variables were calculated to characterize the degree of isolation of each site: distance Y , the distance to the closest habitat patch (measured from patch edge to patch edge) of equal or larger size (Soulé et al. 1988), and distance Z , the shortest distance to any other habitat fragment, reserve, or possible movement linkage to such sites (e.g., riparian channels, power line easements, golf courses). Isolation was scored as zero for control sites directly adjacent to a larger natural area and as the width of the roadway for control sites isolated from larger habitat blocks by a roadway.

All landscape variables were log-transformed to meet normality assumptions in the statistical analyses. When only the urban habitat fragments were considered, fragment age was positively related to distance Y ($r = 0.564$, $p = 0.001$) and distance Z ($r = 0.526$, $p = 0.003$), and distance Y was positively related to distance Z ($r = 0.362$, $p = 0.053$). When both habitat fragments and control areas were included, area was negatively related to age ($r = -0.813$, $p < 0.001$), distance Y ($r = -0.467$, $p = 0.003$), and distance Z ($r = -0.299$, $p = 0.065$); age was positively related to distance Y ($r = 0.741$, $p < 0.001$) and distance Z ($r = 0.597$, $p < 0.001$); and distance Y was positively related to distance Z ($r = 0.761$, $p < 0.001$).

SPECIES RICHNESS AND DISTRIBUTION

Island biogeography theory predicts that landscape variables such as size and isolation should help determine the number of species on islands (MacArthur & Wilson 1967). To test this prediction, I calculated two measures of carnivore species richness for each study area: (1) the number of carnivore species detected at the site during the course of the study and (2) the number of native carnivore species detected, excluding the non-native opossum and domestic cat. A species was present in a study area if it was detected on track stations within the site at least once during the course of the study. Presence was verified with a combination of remotely triggered cameras, scat surveys, and opportunistic visual sightings. Presence of a species does not necessarily imply that the site can support resident animals or populations. Like-

wise, failure to detect a species at a site does not indicate that the species has never visited the area, but rather that it was not recorded during sampling sessions.

I used backward-elimination multiple regression to identify which landscape variables (size, age, and isolation) were the best predictors of carnivore species richness in a study site. Independent variables with $p < 0.15$ were included in all regression models to minimize exclusion of important predictors from the model, and tolerance values were set at 0.10 throughout to control for multicollinearity (Tabachnick & Fidell 1996). Comparison-wide error rates were examined in all statistical analyses (Mead 1988; Stuart-Oaten 1995) ($p < 0.05$, statistically significant; $0.05 < p < 0.10$, marginally significant). I first conducted the multiple-regression analyses including only the 29 urban habitat fragments and then including all 39 study sites.

I used logistic-regression analyses to evaluate the effect of landscape variables on the distribution of individual carnivore species. First, I constructed bivariate logistic-regression models to evaluate the separate effects of area and isolation (distance Z) on the probability of occurrence for each species across all 39 study sites. Area and distance Z were chosen because preliminary analyses indicated that they were the two strongest predictors of carnivore distribution. For species with significant area and isolation effects, I plotted logistic-regression curves of the probability of occurrence of each species as a function of area, holding isolation constant by substituting its median value into a two-way (area \times isolation) logistic model. Likewise, I constructed isolation curves after holding area constant by substituting its median value into the two-way logistic model. From these curves, I calculated the area and isolation at which the probability of occurrence of the species equaled 50% and used these estimates to represent the relative area and isolation requirements for each species (following Crooks et al. 2001). Finally, I used multiple-logistic-regression models to graphically evaluate the combined effect of area and isolation on probability of occurrence for each species.

Logistic-regression estimates of probability of occurrences and relative area and isolation requirements are not intended, however, to represent the actual fragment size or isolation necessary to ensure the long-term persistence of a population (Hinsley et al. 1996). Rather, probability of occurrence measures the probability of an individual visiting the study area at least once during the course of the study, and the area and isolation estimates generated are intended to function only as relative indices of sensitivity to fragmentation. Area and isolation estimates are likely to be more accurate for those species with the most detections.

RELATIVE ABUNDANCE

I used backward-elimination regression models to identify which landscape variables were the best predictors

of the track indices of each species in each study area. The analyses were first conducted including only the 29 urban habitat fragments. Mountain lions, spotted skunks, badgers, and long-tailed weasels were omitted from these analyses because they were not detected in any urban habitat fragments. Bobcats, detected in only two fragments, were also omitted.

I repeated the multiple-regression analyses across all 39 fragments and control sites, including mountain lions and bobcats in the analyses. Spotted skunks, badgers, and long-tailed weasels were again omitted due to low detection rates. Because the track indices for mountain lions and bobcats were zero for many sites, the results of these regressions must be interpreted with caution. The final regression models were determined largely by the patterns of species' presence or absence across sites and not by variation in relative abundance among sites where they occurred. Nevertheless, I report regression models for mountain lions and bobcats to allow for further evaluation of the effects of landscape variables on these species and for further comparisons of their fragmentation sensitivities to those of other carnivore species.

Local Variables

Habitat heterogeneity within these urban habitat fragments is an important determinant of the persistence of native scrub-breeding birds (Soulé et al. 1988), rodents (Bolger et al. 1997), and invertebrates (Suarez et al. 1998; Bolger et al. 2000), all potential prey for carnivore species. I measured three variables to investigate the effect of habitat heterogeneity on carnivore populations: distance to the urban edge, percent cover of native shrubs, and percent cover of exotic vegetation. I estimated the distance of each track station to the nearest urban edge (the backyards of the houses bordering the fragment) and log-transformed these values to meet normality assumptions in the statistical analyses. I used a Braun-Blanquet categorical scale (Kent & Coker 1992) to estimate the percent cover of native shrubs and of total exotic cover within a 20-m radius around each track station. The cover scale was 0 (<1%), 1 (1–5%), 2 (6–25%), 3 (26–50%), 4 (51–75%), and 5 (76–100%). Distance to edge was positively related to shrub cover ($r = 0.281$, $p = 0.007$) and negatively related to exotic cover ($r = -0.341$, $p = 0.001$), and shrub cover was negatively related to exotic cover ($r = -0.694$, $p < 0.001$).

SPECIES RICHNESS AND RELATIVE ABUNDANCE

I calculated the total number of carnivore species and the number of native carnivore species detected at each track station in the 29 urban habitat fragments during the course of the study; two exotic species (opossum and domestic cat) and five native species (bobcat, coyote, gray fox, striped skunk, and raccoon) were detected

in the urban fragments and were hence included in the analyses. I then used backward-elimination multiple regression to identify which local variables were the best predictors of carnivore species richness at each station.

I calculated the mean track index for each species at each track station in the 29 urban habitat fragments to generate relative abundance indices. Again, mountain lions, spotted skunks, long-tailed weasels, badgers, and bobcats were omitted from these analyses due to low detection rates within fragments. I then used backward-elimination multiple regression to identify which local variables were the best predictors of the relative abundance of each species at a station. Some species were absent from some fragments, however, an absence driven in part by landscape variables such as area, age, and isolation. I therefore conducted the regressions for each species after excluding from the analyses all fragments where that species was never detected. By excluding these fragments I could account for the effects of landscape-level fragmentation on the presence or absence of a species and therefore more fully analyze the effects of local variables within fragments where that species occurred.

To further evaluate the effect of the urban edge on carnivores within fragments, for each species I graphed the mean track index at each station as a function of the distance of that station from the urban edge. Edge distances were classified into five categories: 0–24 m ($n = 14$ stations), 25–49 m ($n = 35$), 50–99 m ($n = 16$), 100–199 m ($n = 19$), and >200 m ($n = 7$). Direct comparisons of track indices between species can be misleading, because the response of species to track stations may differ (Conner et al. 1983; Sargeant et al. 1998). To allow for more meaningful comparisons of track indices, I standardized the index for each species by dividing each value by the maximum track index recorded for that species. Therefore, these standardized track indices for each species ranged on a scale of 0 to 1.

Body Size and Fragmentation Sensitivity

I evaluated the relationship between body mass and sensitivity to fragmentation among carnivore species through linear-regression analysis. As an index of sensitivity to fragmentation, I calculated the average area of study sites occupied by each species, multiplying the area of each study site by the standardized track index (scale 0 to 1) of that species at that site. With area weighted by relative abundance per sampling point, the indices accounted not just for occupancy but also for differences in the relative abundance of a species among study sites. For example, for a given species, some study sites supported resident populations, whereas other study sites were only visited temporarily during the course of the study. Average area weighted by relative abundance accounted for such differences. In addition, I

also compared body mass to typical home-range sizes and population densities reported in the literature for these species.

Results

Landscape Heterogeneity: Comparisons among Fragments

SPECIES RICHNESS AND DISTRIBUTION

The distribution of carnivore species varied across study sites (Table 1). Coyotes, opossums, gray foxes, domestic cats, striped skunks, and raccoons were detected in most urban fragments. Bobcats were detected in 9 of the 10 control sites but in only 2 urban habitat fragments, and mountain lions were detected in only 7 control sites and no urban fragments. I recorded few to no visits of mountain lions and bobcats in the habitat fragments, despite higher sampling intensity per unit area (station-nights/total area of site) in the 29 fragments (mean = 8.30 station-nights/ha, SE = 0.910) than in the 10 control sites (mean = 0.43 station-nights/ha, SE = 0.158) ($t = 4.58$, $p < 0.001$). Detections of spotted skunks, long-tailed weasels, and badgers were rare and occurred only in the larger habitat blocks.

Among the 29 urban habitat fragments, no landscape variables were retained as predictors of the total number of carnivore species in backward-elimination regression models (Table 2). When the opossum and domestic cat were excluded, however, the species richness of native carnivores exhibited a weak negative trend with fragment isolation (distance Z) and a weak positive trend with fragment age. When control sites were included in the analyses, both total carnivore species richness and native carnivore species richness increased with the area of the study site.

Logistic-regression models for each species indicated that the probability of occurrence across all sites was positively related to fragment area for coyotes ($\chi^2 = 5.57$, $p = 0.018$), bobcats ($\chi^2 = 29.85$, $p < 0.001$), mountain lions ($\chi^2 = 27.35$, $p < 0.001$), spotted skunks ($\chi^2 = 5.85$, $p = 0.016$), long-tailed weasels ($\chi^2 = 5.37$, $p = 0.021$), and badgers ($\chi^2 = 9.73$, $p = 0.002$). In contrast to these native carnivores, the probability of occurrence of domestic cats was higher in smaller fragments ($\chi^2 = 22.63$, $p < 0.001$). Area was not a significant predictor of probability of occurrence for gray foxes ($\chi^2 = 0.24$, $p = 0.627$), striped skunks ($\chi^2 = 1.81$, $p = 0.178$), raccoons ($\chi^2 = 2.02$, $p = 0.155$), or opossums ($\chi^2 = 0.357$, $p = 0.550$).

Logistic-regression models indicated that probability of occurrence across all sites decreased with fragment isolation (distance Z) for coyotes ($\chi^2 = 6.92$, $p = 0.008$), bobcats ($\chi^2 = 11.57$, $p < 0.001$), and mountain lions ($\chi^2 = 11.88$, $p < 0.001$). In contrast, probability of oc-

Table 2. Backward-elimination regression models of the effects of landscape variables on carnivore species richness and relative abundance among 29 urban habitat fragments and 10 control sites in coastal southern California.^a

Variables	R ²	Whole-model p	Coefficient	p
Urban habitat fragments				
total species richness				
n.s. ^b				
native species richness	0.146	0.129		
distance Z			-0.408	0.067
age			+0.374	0.091
coyote	0.133	0.052		
area			+0.365	0.052
gray fox	0.114	0.074		
area			-0.336	0.074
domestic cat	0.393	0.002		
area			-0.550	0.001
distance Z			+0.246	0.122
opossum	0.164	0.029		
area			-0.405	0.029
striped skunk				
n.s.				
raccoon				
n.s.				
All sites				
total species richness	0.194	<0.001		
area			+0.440	<0.001
native species richness	0.372	<0.001		
area			+0.610	<0.001
coyote	0.15	0.015		
area			+0.388	0.015
bobcat	0.595	<0.001		
age			-0.921	<0.001
distance Y			+0.607	0.004
distance Z			-0.376	0.030
mountain lion	0.277	<0.001		
age			-0.526	<0.001
gray fox	0.197	0.005		
area			-0.444	0.005
raccoon	0.081	0.081		
area			-0.284	0.081
domestic cat	0.335	<0.001		
area			-0.579	0.001
opossum	0.241	0.002		
area			-0.491	0.002
striped skunk				
n.s.				

^aIndependent variables are fragment area, age, and isolation (distance Y and distance Z). Independent variables with $p < 0.15$ were included in the final regression models.

^bNo independent variables were retained in the regression model ($p > 0.15$); n.s., not significant.

currence was higher in more isolated fragments for domestic cats ($\chi^2 = 4.25$, $p = 0.039$). Isolation was not a significant predictor of probability of occurrence for gray foxes ($\chi^2 = 0.35$, $p = 0.553$), opossums ($\chi^2 = 1.88$, $p = 0.171$), spotted skunks ($\chi^2 = 0.18$, $p = 0.671$), striped skunks ($\chi^2 = 0.69$, $p = 0.407$), raccoons ($\chi^2 = 0.06$, $p = 0.811$), long-tailed weasels ($\chi^2 = 1.74$, $p = 0.187$), or badgers ($\chi^2 = 2.62$, $p = 0.106$).

After I controlled for isolation effects, the estimated area at which probability of occurrence was 50% was 1 ha for coyotes, 1.8 km² for bobcats, and 23 km² for mountain lions (Fig. 1a). The probability of occurrence

for domestic cats dropped below 50% in fragments larger than 1.4 km²; cats were never detected in the interior of control sites, and few if any feral cats occurred in these sites.

After I controlled for area effects, the estimated fragment isolation (distance Z) at which probability of occurrence was 50% was 883 m for coyotes and 6 m for bobcats (Fig. 1b). The probability of occurrence for mountain lions was <50% across the entire isolation range of fragments. In contrast, the probability of occurrence for domestic cats was >50% across the entire range of fragment isolation.

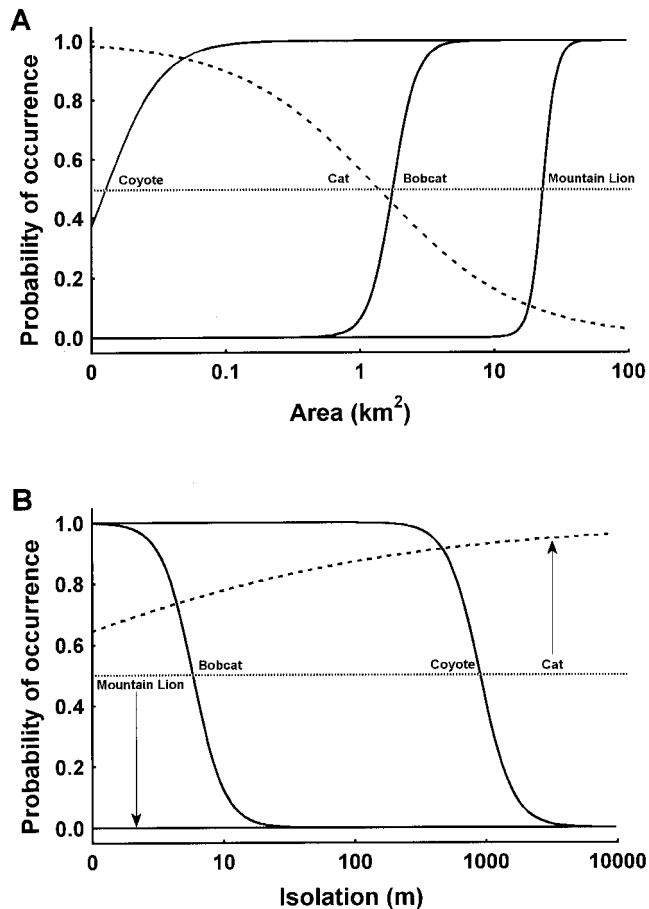


Figure 1. Logistic-regression models of the probability of occurrence of native (solid lines) and exotic (dashed line) carnivores as a function of (a) fragment area and (b) isolation. Area and isolation curves were constructed after the other independent variable was held constant by substituting its median values into a two-way (area \times isolation) logistic-regression model. Only species with significant area and isolation effects are presented. Dotted line represents 50% probability of occurrence.

Multiple logistic-regression models of the combined effect of area and isolation on mountain lions, bobcats, and coyotes generated “extinction surfaces” that consisted of plateaus of occupancy at larger and less isolated sites that declined to basins of local extinctions at small and isolated fragments (Fig. 2). The effect of the area-isolation interaction, and hence the contour of the extinction surfaces, varied among species. The plateau for mountain lions was small and occurred only in the largest unfragmented sites, with large basins across all other study areas. The plateau for bobcats spanned a wider range of sites, but probability of occurrence dropped to zero in sites that were both small and isolated. Bobcats occurred in relatively small sites, but only those with little to no isolation. The plateau of coyotes was large, with

a low probability of occurrence in only the smallest, most isolated urban fragments. Domestic cats exhibited a surface that was the inverse of these native predators. Their probability of occurrence was high in small and isolated fragments but lower in larger, less fragmented sites.

It should be emphasized, however, that the probability of residency or long-term viability of populations is undoubtedly lower than these probabilities of occurrence, particularly in smaller and isolated sites. For example, coyotes visited some fragments only temporarily during the course of the study. In some quarterly sampling sessions they were detected and in others they were not. Although the plateau of occupancy for coyotes encompassed most combinations of area and isolation, residency declined with fragment area. The average area of the 13 fragments in which coyotes came and went (mean = 0.75 [5.6 ha back-transformed], SD = 0.20) was smaller ($t = 3.01$, $p = 0.006$) than the average area of the 13 fragments in which coyotes were detected in every quarterly sampling session (mean = 1.19 [15.6 ha back-transformed], SD = 0.95).

RELATIVE ABUNDANCE

When only the 29 urban habitat fragments were included in the analyses, the relative abundance of coyotes at each sampling point was higher in larger fragments, whereas track indices of gray foxes, domestic cats, and opossums were higher in smaller fragments (Table 2). No variables were retained in the final model for raccoons and striped skunks ($p > 0.15$).

When control sites were also included in the regressions, coyote track indices at each sampling point again tended to be higher in larger sites. In contrast, the track indices of gray foxes, domestic cats, opossums, and raccoons were higher in smaller sites (Table 2). No landscape variables were retained in the models for the relative abundance of striped skunks.

When control sites were included in the regression models, fragment age was retained as the most significant predictor of the relative abundance of mountain lions and bobcats (Table 2); both species were less abundant in older sites. Mountain lions and bobcats were detected in relatively few sites, most of which were control areas not isolated by urban development (age = 0) and, for bobcats, a couple of recently isolated fragments (Table 1). This pattern generated the significant, negative slope between relative abundance and age for the two species.

The relative abundance of bobcats decreased with distance to the nearest movement linkage or natural area (distance Z) but, paradoxically, increased with distance to the nearest habitat patch of equal or larger size (distance Y). Bobcats were detected at sites that were relatively distant from larger natural areas (high values of

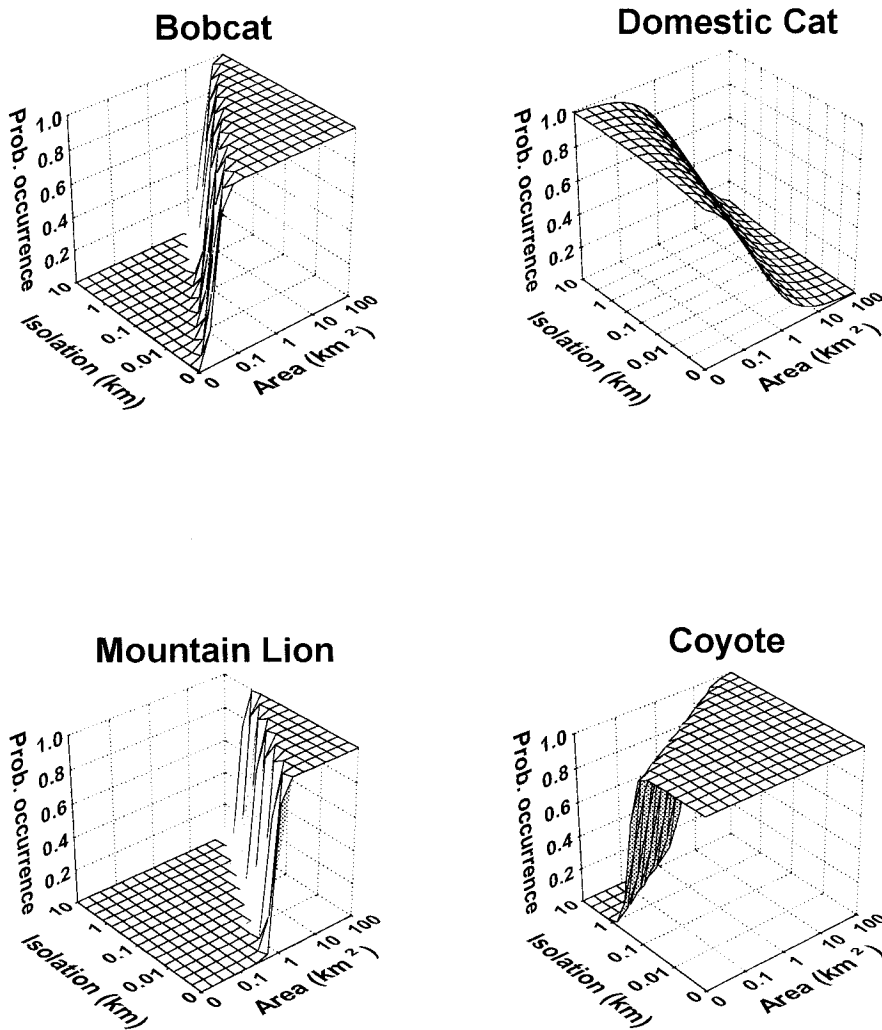


Figure 2. Multiple logistic-regression models of the probability of occurrence of mountain lions, bobcats, coyotes, and domestic cats as a function of fragment area and isolation. Only species with significant area and isolation effects are presented.

distance Y), but only if they were large or were near movement linkages to larger habitat blocks (low value of distance Z). For example, bobcats have persisted in the San Joaquin Hills, an isolated (distance $Y = 5353$ m) but large (4219 ha) habitat block. Bobcats were also detected in Mil Cumbres, a small (6 ha) urban fragment that was isolated from larger natural areas (distance $Y = 550$ m) but that was near a golf course (distance $Z = 23$ m), which likely served as a movement linkage to natural areas to the east.

Local Heterogeneity: Comparisons within Fragments

SPECIES RICHNESS AND RELATIVE ABUNDANCE

The number of carnivore species detected was greater at track stations closer to the urban edge (Table 3). This pattern was largely determined by non-native species. When exotic predators (domestic cats, opossums) were excluded from the analyses, the number of native species detected at each station did not vary significantly with any local variables.

The relative abundance of gray foxes and opossums was higher at track stations near the urban edge within fragments where each species occurred (Table 3). The abundance of domestic cat exhibited a weak negative trend with distance to urban edge. The relative abundance of striped skunks tended to be higher at greater distances from the urban edge. Domestic cats and raccoons tended to be more abundant at stations with more exotic cover. No local variables entered the model for the relative abundance of coyotes.

A graphical analysis revealed that the coyote rate of visitation to track stations was high both near the urban edge and into the interior of the urban habitat fragments (Fig. 3). The abundance of striped skunks also was relatively high in the interior of fragments. In contrast, the abundance of opossums, gray foxes, domestic cats, and raccoons was relatively high within 50 m from urban development, but then tended to decline into the interior of the habitat fragment.

Body Size and Fragmentation Sensitivity

When all species were included in the regression, the relationship between body mass (Table 4) and the average

Table 3. Backward-elimination regression models of the effects of local habitat variables on carnivore species richness and relative abundance at 92 track stations within 29 urban habitat fragments in southern California.^a

Variables	R ²	Whole-model p	Coefficient	p
Total species richness	0.049	0.036		
edge			-0.222	0.036
Native species richness				
n.s. ^b				
Coyote (87 stations)				
n.s.				
Gray fox (85)	0.146	<0.001		
edge			-0.382	<0.001
Striped skunk (69)	0.042	0.095		
edge			0.205	0.095
Raccoon (62)	0.056	0.066		
exotic			0.237	0.066
Domestic cat (73)	0.143	0.005		
exotic			0.242	0.057
edge			-0.205	0.105
Opossum (79)	0.079	0.013		
edge			-0.281	0.013

^aIndependent variables are distance to urban edge, native shrub cover, and total exotic cover. Independent variables with $p < 0.15$ were included in the final regression models. For each species, stations were included only in analyses for those fragments where the species was detected.

^bNo independent variables were retained in the regression model ($p > 0.15$); n.s., not significant.

area of study sites occupied by each carnivore species, weighted by the standardized track index of each species at each site, was not significant ($r = -0.392$, $p = 0.233$) (Fig. 4a). Spotted skunks, long-tailed weasels, and badgers, however, appeared to be outliers to an otherwise positive relationship between body size and average area of sites occupied. When these three species were excluded from the regression, the positive relationship was significant ($r = 0.725$, $p = 0.042$). Body mass was also positively related to typical home-range sizes (Fig. 4b: $r = 0.720$, $p = 0.012$) and negatively related to typical population densities (Fig. 4c: $r = -0.705$, $p = 0.015$) recorded for these species (Table 4).

Discussion

Landscape Heterogeneity and Carnivore Populations

Fragment area and isolation were the two strongest landscape predictors of predator distribution and abundance. Badgers, long-tailed weasels, spotted skunks, mountain lions, bobcats, and coyotes appear to be the species most sensitive to fragmentation, with a lower probability of occurrence and relative abundance per unit area in smaller and more isolated habitat patches. In contrast, the probability of occurrence and relative abundance of domestic cats, gray foxes, and opossums tended to decrease with fragment area and increase with fragment isolation. Landscape descriptors had relatively little effect on the distribution and abundance of raccoons and striped skunks. Because some carnivores

were fragmentation-sensitive, some fragmentation-enhanced, and some fragmentation-tolerant, landscape variables appear to affect species composition more than species richness.

The probability of occurrence of mountain lions, bobcats, and coyotes declined in sequence as habitat patches became smaller and more isolated (Fig. 1). Because mountain lions, bobcats, and coyotes generally occurred in fragments above some threshold of size and isolation, local extinctions of their populations in a fragmenting landscape appear deterministic and predictable (Brown 1986). Such thresholds also suggest that, depending on the species and the degree of fragmentation, a single large reserve would have a higher probability of supporting populations of these predators than archipelagos of similar but smaller isolates (Soulé & Simberloff 1986). For example, our models predict that the probability of occurrence of bobcats will be low in 10 1-km² isolates but higher in a 10-km² reserve, and that the probability of occurrence of mountain lions will be low in 10 10-km² isolates but higher in a 100-km² reserve (Fig. 1).

Unlike true islands, habitat patches are part of a landscape mosaic, and the presence of a given species in a patch may be a function not only of patch size and isolation, but also of how the species perceives the intervening matrix (Andren 1994; Rosenblatt et al. 1999). In previous studies in this system, fragment age and area were the most important landscape predictors of the distribution and abundance of native plants (Alberts et al. 1993), scrub-breeding birds (Soulé et al. 1988; Crooks et al. 2001), rodents (Bolger et al. 1997), and invertebrates

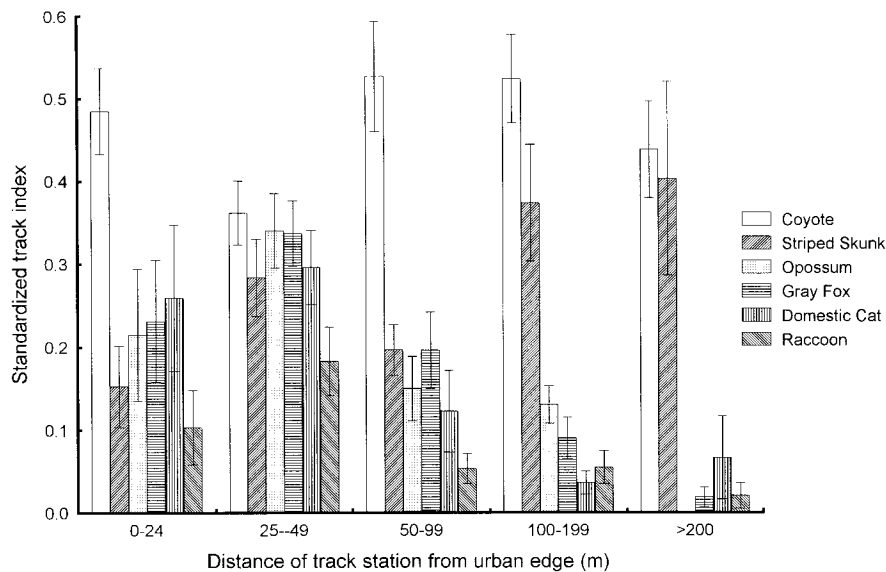


Figure 3. Track indices of carnivore species within urban habitat fragments as a function of the distance of the station from the urban edge. Track indices are standardized for each species.

(Suarez et al. 1998; Bolger et al. 2000). With limited exceptions, isolation effects were absent for these species, likely due to their strict habitat requirements and low dispersal capabilities (Soulé et al. 1992). For these taxa, little to no dispersal across developed areas resulted in complete isolation once fragmentation had occurred, with the fragments operating as true islands immersed within a relatively inhospitable matrix. My results also indicate that fragment isolation was not a strong predictor of the distribution and abundance of human-tolerant mesopredators, although the causal mechanisms differed. Unlike many native scrub-breeding birds, rodents, and invertebrates, mesopredator species such as raccoons, striped skunks, opossums, and domestic cats move through and reside within developed areas and thus perceive the urban matrix as somewhat permeable. High rates of movement through the matrix within

which fragments are embedded should also minimize the effects of fragment isolation.

Local Heterogeneity and Carnivore Populations

Within the urban fragments, exotic cover and distance to the urban edge were the strongest local predictors of carnivore distribution and abundance. These two variables were correlated, with more exotic cover and less native shrub cover closer to the urban edge. Previous studies have found that scrub-breeding birds (Soulé et al. 1988), rodents (Bolger et al. 1997), and invertebrates (Suarez et al. 1998; Bolger et al. 2000) require native vegetation to persist in these fragments. Unlike many of these species, however, the mammalian carnivores detected in the habitat fragments are resource generalists that likely benefit from the supplemental food resources

Table 4. Ecological characteristics of mammalian carnivores detected in coastal southern California.^a

Species	Weight (kg)	Home range (km ²)	Density (km ²)	Reference
Mountain lion	69.5 (36.0–103.0)	492 (112–829)	0.027 (0.005–0.048)	Beier & Barrett 1993; Nowak 1999
Coyote	13.5 (7.0–20.0)	5.69 (0.66–11.96)	0.3 (0.2–0.4)	Nowak 1999; Sauvajot et al. 2000
Bobcat	9.7 (4.1–15.3)	2.94 (0.24–5.63)	1.34 (1.15–1.53)	Lembeck 1986; Nowak 1999
Badger	8.0 (4–12)	2.0 (1.6–2.4)	2.70 (0.39–5.0)	Messick 1987; Nowak 1999
Raccoon	7.0 (2.0–12.0)	0.52 (0.39–0.65)	11.2 (2.3–20.0)	Nowak 1999
Gray fox	4.4 (1.8–7.0)	0.69 (0.22–1.87)	5.2 (0.4–10.0)	Nowak 1999; Riley 1999
Domestic cat ^b	3.9 (3.3–4.5)	0.40 (0.001–3.80)	150 (2–500)	Barratt 1997; Nowak 1999
Opossum	3.8 (2.0–5.5)	0.20 (0.05–2.54)	26 (2–116)	Nowak 1999
Striped skunk	1.6 (0.7–2.5)	0.21 (0.11–0.37)	3.3 (1.8–4.8)	Nowak 1999
Spotted skunk	0.6 (0.2–1.0)	0.49 (0.34–0.65)	24.4 (8.8–40)	Crooks & Van Vuren 1995; Kinlaw 1995; Nowak 1999
Long-tailed weasel	0.2 (0.09–0.34)	0.62 (0.04–1.20)	19.4 (0.38–38)	Nowak 1999

^aEstimates of body size, home range, and population density vary considerably (Nowak 1999). Values are typical averages and ranges (in parentheses). If no average estimate was provided, median values, calculated from the ranges, are presented. Body-mass estimates were taken from Nowak (1999). Where available, home ranges and population densities were taken from studies conducted in California.

^bEstimates include studies from suburban, urban, rural, and island cat populations.

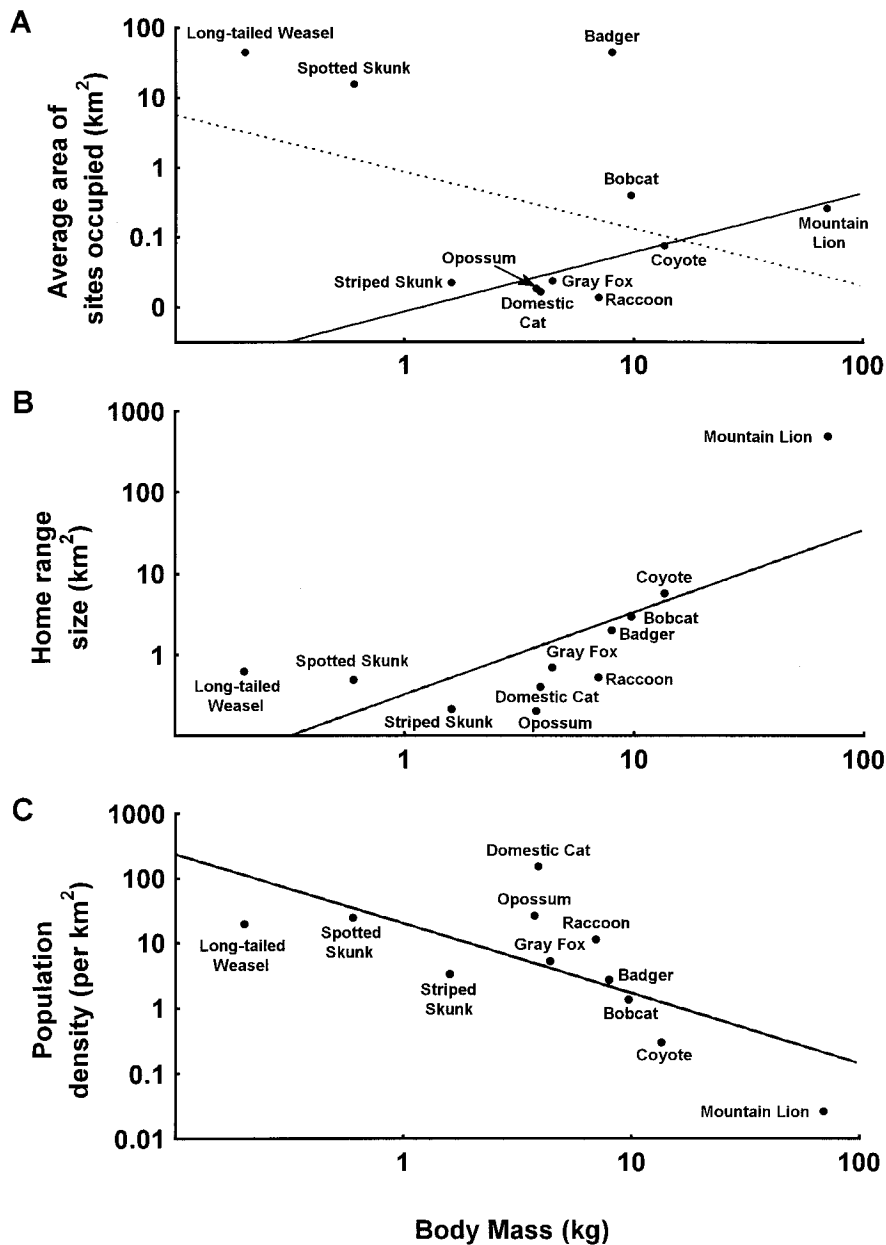


Figure 4. Relationship between log body mass and (a) log average area of sites occupied by mammalian carnivores, weighted by the relative abundance of each species at each site, (b) log home-range size ($r = 0.720$, $p = 0.012$; see Table 4 for values), and (c) log population density ($r = -0.705$, $p = 0.015$; see Table 4 for values). Dotted line in (a) is the least-squares regression fit including all species in the analysis ($r = -0.392$, $p = 0.233$), and the solid line in (a) is the regression excluding spotted skunks, long-tailed weasels, and badgers ($r = 0.725$, $p = 0.042$).

(e.g., garden fruits and vegetables, garbage, direct feeding by humans) associated with residential developments. As a result, the carnivore visitation rate actually increased at sites with more exotic cover and closer to the urban edge, a pattern determined largely by the increased abundance of fragmentation-enhanced mesopredators (gray foxes, opossums, and domestic cats) at edge sites within habitat fragments. Although some carnivores within the habitat fragments seem tolerant of disturbance, these fragments have already lost an entire suite of predator species, including mountain lions, bobcats, spotted skunks, long-tailed weasels, and badgers. Furthermore, the habitat fragments are relatively small (<100 ha), so the most “interior” sites within the fragments are still relatively near (<250 m) urban edges.

Unlike true islands, “edge effects” that emanate from the human-dominated matrix can increase the extinction probability of isolated populations (Murcia 1995; Woodroffe & Ginsberg 1998). Human-tolerant mesopredators in southern California represent such an edge effect. They occur within the developed matrix, and are effective predators on birds, bird nests, and other vertebrates in this system and elsewhere (Crooks & Soulé 1999). Several factors likely account for increased numbers and activity of mesopredators in disturbed landscapes. Residential developments represent suitable habitat for some mesopredator species whose distributions are closely associated with human-dominated landscapes (Donovan et al. 1997). In addition to

habitat suitability, however, dominance interactions between carnivores affect mesopredator populations. When large, dominant predators disappear in fragmented systems, smaller, subordinate predators can subsequently undergo an ecological release, a pattern termed mesopredator release (Soulé et al. 1988; Crooks & Soulé 1999). In the San Diego habitat fragments, Crooks and Soulé (1999) found that lower visitation rates of coyotes in small, isolated remnants resulted in elevated numbers and activity of urban mesopredators, even after statistically controlling for potential confounding variables such as fragment area, age, and isolation. Mesopredator species therefore appear to be ecologically released by fragmentation not only because they can adapt well to urban environments, but also because such sites may provide refugia from dominant predators.

All Carnivores Are Not Created Equal

Although they are generally considered part of the same ecological guild, I found that carnivores were heterogeneous in their sensitivities to landscape and local fragmentation variables. As predicted, body-size differences partially accounted for this heterogeneity in response. Body mass was positively related to typical home-range sizes (Fig. 4b) and negatively related to typical population densities (Fig. 4c) recorded for these species, patterns consistent with those observed among mammals (Lindstedt et al. 1986). Due to their wide ranges and low densities, larger-bodied carnivores generally required larger areas (Fig. 4a), eventually disappearing in habitat fragments that were not connected by movement corridors. Obvious exceptions to the allometry of body size and fragmentation sensitivity, however, were spotted skunks, long-tailed weasels, and badgers, small- to medium-bodied species that exhibit relatively small home ranges and high population densities but that were detected only in the largest habitat blocks. Unlike the generalist urban mesopredators, these relatively specialized mustelids tend to be primarily carnivorous and somewhat restricted in their habitat preferences (Nowak 1999). Such specializations likely contribute to their patchy distribution in coastal southern California and increase their vulnerability to environmental disturbances. Clearly, in addition to body size, other ecological traits such as diet, resource specialization, social structure, and behavior contribute to species-specific responses to fragmentation effects.

Differential sensitivities to fragmentation can be useful criteria when focal species are chosen for ecological research and conservation planning. Mammalian carnivores can be excellent focal organisms with which to evaluate the degree of functional landscape-level connectivity, because they are area-dependent species that require movement corridors for persistence (Beier 1993;

Noss et al. 1996; Soulé & Terborgh 1999). The choice of appropriate carnivore focal species, however, depends on the scale or intensity of fragmentation in an area and the corresponding responses of carnivore populations to fragmentation effects at that scale. As Figs. 1 and 2 make evident, the scale of landscape-level connectivity in southern California varies widely, ranging from small, isolated urban remnants to large, intact habitat blocks.

At one extreme of the connectivity scale are the highly fragmented landscapes of urban coastal southern California (e.g., patch size $<1 \text{ km}^2$; Fig. 1a). Coyotes and urban mesopredators can be useful focal species with which to understand the effects of fragmentation at this scale. Fragmentation-enhanced predators such as opossums and domestic cats can function as direct, positive indicators of environmental disturbances associated with urban development, edge effects, and the invasion of exotic predators and competitors into natural systems. Coyotes have also persisted in developed areas in southern California. The remarkable behavioral plasticity of coyotes and their ability to succeed in disturbed areas limits their utility as an indicator of connectivity across much of coastal southern California. Nevertheless, coyote occupancy, residency, and relative abundance declined with fragment area and isolation, to the point of local extinctions of coyote populations in the smallest, most isolated urban remnants. Coyotes can therefore serve as useful indicators of functional connectivity in highly fragmented areas, particularly those sites that have already lost more vulnerable predators such as bobcats and mountain lions (Figs. 1 & 2). Furthermore, the ecologically pivotal role of coyotes (Crooks & Soulé 1999) warrants their inclusion in research and conservation plans, particularly in regions with active predator-control programs.

Mountain lions are situated at the opposite end of the connectivity scale (e.g., patch size $>100 \text{ km}^2$; Fig. 1a) and appear extremely sensitive to the loss and fragmentation of habitat. The large body size and solitary behavior of mountain lions translate to large home ranges and low population densities (Table 4). Therefore, many of the isolated habitat remnants in urban southern California are likely too small and too isolated to permanently support any resident lion populations (Figs. 1 & 2) (see also Beier 1993). Consequently, mountain lions or other large, apex predators may not be the most effective indicator species with which to evaluate the degree of functional landscape-level connectivity in moderately to highly fragmented landscapes. The mountain lion's requirement for a large home range and its sensitivity to environmental perturbations, however, can make it a valuable focal species in larger, more intact habitat blocks (Beier 1993).

Finally, bobcats were intermediate in their sensitivity to fragmentation, a degree of sensitivity commensurate to the scale of fragmentation across much of coastal

southern California (e.g., $1 \text{ km}^2 < \text{patch size} < 100 \text{ km}^2$; Fig. 1a). Bobcats were less sensitive to disturbance than mountain lions, which seldom occurred in fragmented areas, yet were more sensitive than coyotes and mesopredators, which were detected in even small urban habitat fragments. Bobcats are generally solitary and are strictly carnivorous (Nowak 1999), resulting in low densities and in resource specializations that likely increase their probability of local extinction. Landscape connectivity appears to be the key to the persistence of bobcat populations in developing landscapes. They can persist in fragmented habitats, but, as my results suggest, only in those landscapes with adequate movement linkages to larger natural areas. The status of bobcat populations is therefore a valuable indicator of the degree of functional, landscape-level connectivity across much of the fragmented landscapes of coastal southern California. In other systems, the choice of indicator species will require information on the level of fragmentation and connectivity in that region and how species respond to fragmentation effects at that scale.

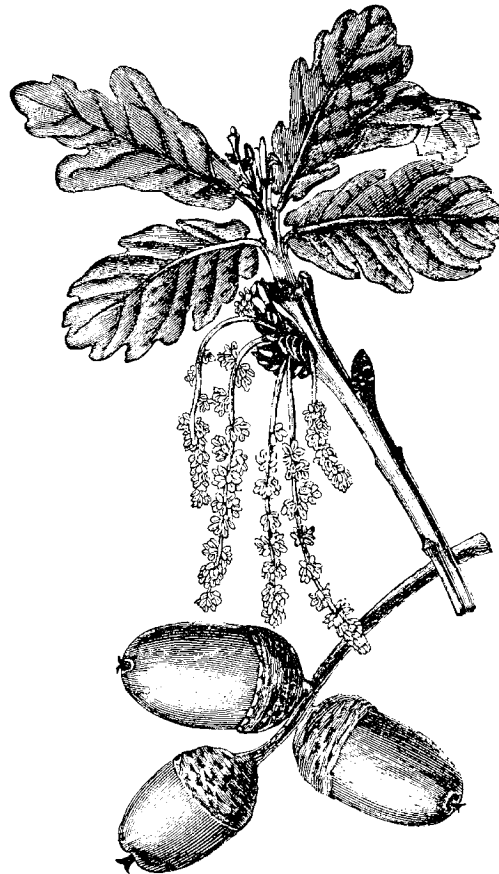
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AUG 04 2006

Mr. Ted Medina, Director
Parks and Recreation Department
202 C Street, MS-9B
San Diego, CA 92101

Re: DPR Project Number: HR 37-005 -- ROSE CANYON OPEN SPACE PARK

Dear Mr. Medina,

This letter is to confirm the telephone conference call on July 24, 2006 the Office of Grants and Local Services (OGALS) had with your staff regarding a pending issue on the above Habitat Conservation Fund (HCF) project. We were following up on a letter from the City of San Diego (City) dated October 24, 2005 requesting OGALS to review and provide direction for the City regarding the proposed Regents Road Bridge. My apologies for the time it took OGALS to get back to the City on this request.

OGALS also wants to use this letter to clarify California State Parks (CSP) authority relative to any change in use of the grant project area, and CSP's continued oversight of any land which benefited from HCF program.

Contract Provision H (1), found on page 73 of the Procedural Guide for the Habitat Conservation Fund Program (Procedural Guide) states that the "Applicant agrees that the property acquired or developed with grant moneys under this agreement shall be used by the Applicant only for the purposes of the California Wildlife Protection Act of 1990 and no other use, sale, or other disposition of the area shall be permitted except by specific act of the Legislature." Therefore under the HCF, CSP does not have the authority to approve changes to the use, sale or disposition of any grant-funded property.

Contract Section H (2), also on page 73 of the Procedural Guide, outlines CSP's ongoing oversight of grant-funded property. This section states that "The Applicant agrees to maintain and operate in perpetuity the property acquired, developed, restored or enhanced with these funds." Based on this contractual agreement between the grantee and CSP, it is the grantee's responsibility to inform CSP of any changes to this agreement. Therefore, if the City decides to proceed with any proposals which would impact the Rose Canyon Open Space Park, it must inform CSP by letter to OGALS, the administrator of the HCF for CSP.

Mr. Ted Medina

AUG 04 2006
Page Two

Hopefully this addresses the City's questions regarding options associated with changes to grant-funded property. If you have further questions, please contact me at (916) 651-8597 or by email at pkeat@parks.ca.gov. We appreciate your interest in the HCF and for bringing the proposed Regents Bridge project to our attention.

Sincerely,



Patti Keating, Chief
Office of Grants and Local Services

Attachment

cc: April Penera, Deputy Director, San Diego DPR
Carol Wood, Grants Administrator, San Diego DPR
State Senator Kehoe
Assemblymember Saldaña
Jean Lacher, Acting Manager, OGALS
Deborah Viney, Supervisor, OGALS
✓ Bill Boston, Project Officer, OGALS



Linda S. Adams
Secretary for
Environmental Protection

California Regional Water Quality Control Board San Diego Region

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July 25, 2006

In reply refer to:
CWU:CEQA:clemc

Ms. Martha Blake
Associate Planner
City of San Diego Development Services Center
1222 First Ave., MS 501
San Diego, CA 92101

Dear Ms. Blake:

**SUBJECT: University City Transportation Corridor EIR, Project #27445,
SCH#2004031011**

By letter dated February 28, 2005 the Regional Board submitted extensive and detailed comments on the Draft EIR (as modified by errata). In that letter we expressed our concern that, "the Draft EIR fails to provide sufficient information to support the conclusion that the project will not have a significant effect on water quality and beneficial uses." The responses to our comments and the Final EIR do not describe the project in sufficient detail, answer our questions, or alleviate our concerns. We urge the City not to certify this EIR until these shortcomings are corrected.

It appears from the Final EIR that the project has the potential to cause significant unmitigable impacts. This is likely to greatly complicate issuance of Clean Water Act Section 401 certification by the Regional Board.

Comments regarding this letter should be forwarded to Ms. Chiara Clemente at (858) 467-2359 or cclemente@waterboards.ca.gov. Written correspondence should be sent to the address above.

Respectfully,


JOHN H. ROBERTUS
Executive Officer

JHR:cmc

California Environmental Protection Agency



California Regional Water Quality Control Board

San Diego Region



Alan C. Lloyd, Ph.D.
Secretary for
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February 28, 2005

Ms. Martha Blake
Associate Planner
City of San Diego Development Services Center
1222 First Avenue, MS 501
San Diego, CA 92101

Dear Ms. Blake:

**SUBJECT: UNIVERSITY CITY NORTH/SOUTH TRANSPORTATION CORRIDOR
STUDY EIR**

The Regional Water Quality Control Board, San Diego Region (Regional Board) has reviewed the draft Environmental Impact Report (draft EIR) and errata for the University City North/South Transportation Corridor Study (Project); prepared by the City of San Diego (City). The draft EIR analyzes three basic transportation projects, and various combinations of transportation projects, within the University City area of the City of San Diego. Two main corridors have been identified: Regents Road Corridor and Genesee Avenue Corridor. Both of these corridors traverse Rose and San Clemente Canyons.

Overall, the draft EIR fails to provide sufficient information to support the conclusion that the project will not have a significant effect on water quality and beneficial uses. Furthermore, the draft EIR fails to identify project-specific measures that will mitigate significant impacts. The Regional Board requests that the Final EIR address the following specific concerns.

PROJECT DESCRIPTION

The project description in the draft EIR is vague, incomplete, and confusing; this makes it difficult to determine the full nature and extent of possible impacts to water quality and beneficial uses. The detailed engineering sections show typical sections, but do not provide information on the entire project. Furthermore, project features described in the text, are not shown on figures depicting project impacts (e.g., proposed parking lot to replace lost parking lot).

WATER QUALITY

Page 2-8 of the draft EIR incorrectly identifies designated surface water beneficial uses for Rose Canyon and San Clemente Canyon. Both canyons include Contact and Non-contact Recreation,

(REC-1 and REC-2), Warm Freshwater Habitat (WARM), Cold Freshwater Habitat (COLD), and Wildlife Habitat (WILD) beneficial uses. San Clemente Canyon also has the Rare, Threatened, or Endangered Species (RARE) beneficial use. The potential beneficial use of Industrial Service Supply (IND) has also been designated for both canyons. The EIR needs to accurately identify and discuss potential impacts to water quality and beneficial uses.

The draft EIR provides a brief explanation of the municipal storm water permit requirements, including site design, source control, and treatment control best management practices (BMPs). Page 4.3-53, *Drainage*, states that "Since the projects in question are roadways, engineering design must include methods to control runoff of rainfall containing petroleum products." However, the draft EIR provides no detail on how this will be accomplished. The document fails to identify specific construction and post-construction BMPs that will be implemented for each project alternative, the expected pollutants(s) and BMP effectiveness, and BMP maintenance requirements and responsibilities. Stating that BMPs are required does not support the conclusion that significant impacts to water quality will not occur.

The draft EIR states several times that dewatering may be required during construction; however, it fails to identify potential volumes, water quality, discharge rates and duration, discharge locations, and specific BMPs. In the absence of this information, the conclusion that impacts are not significant is premature.

Table 4.10-1 is misleading. The table uses inappropriate thresholds and makes the erroneous conclusion that significant impacts will not be significant because the City will comply with water quality standards and obtain permits; the draft EIR does not provide any information to demonstrate that the project can or will comply with water quality standards. The EIR needs to look at revising thresholds and adding additional thresholds. For example, the threshold that construction impacts on water quality would only be considered significant if over 1 acre of land was disturbed is inappropriate and does not relate to statements in the text. Furthermore, grading of less than 1 acre can result in significant impacts depending on the location, BMPs, and other factors (e.g., uncontained hydraulic line break on heavy equipment). Additional thresholds are provided in Section 4.10.2.1 that are not included in Table 4.10-1.

Proposed mitigation measures identified in Section 4.10.2.2 (vegetated detention basin) and Section 4.10.3.3 (detention facilities, planted areas, and energy dissipaters) are not identified in the project description. At a minimum, the location of the proposed facilities need to be delineated on figures; sizing criteria and maintenance requirements need to be described; and impacts resulting from their construction and operation need to be identified and assessed. It is critical that the EIR identify the locations and operations of the basins to allow the public and reviewing agencies to determine if the City is proposing to alter a riverine system to that of a ponded system. Detention facilities should be placed in upland areas, immediately adjacent to storm drain outlets. Regional Board staff would recommend denial of a Section 401 Water

Quality Certification application if detention facilities are proposed for construction within jurisdictional waters.

IMPACTS TO JURISDICTIONAL WATERS OF THE U.S. AND STATE

The Draft EIR does not clearly, consistently, and accurately identify existing conditions and impacts to waters of the U.S. and State. Specific examples include the following:

1. Figures 4.3-2 and 4.3-3A appear to identify different plant communities for the same polygon. Southern Cotton-Willow Riparian Forest (SCWRF) south of the train tracks on Figure 4.3-3A is labeled as Non-native Grassland (NNG) on Figure 4.3-2. Coastal Sage Scrub (CSS) and NNG on Figure 4.3-2 are labeled as SCWRF on Figure 4.3-3A.
2. For all figures that show temporary impacts, the lack of closed impact polygons makes it difficult to know whether an area will be temporarily impacted or not.
3. Figure 4.3-3A does not show temporary impacts to southern willow scrub north of the train tracks; this is shown as an existing community on Figure 4.3-2.
4. Existing unvegetated streambed is not shown on Figure 4.3-2.
5. Table 4.3-2 does not provide impacts to unvegetated streambed and SCWRF for Rose Canyon. Additionally, the table does not quantify impacts to Southern Willow Scrub (SWS) that is shown on Figure 4.3-3B in San Clemente Canyon and the figure does not show Mule Fat Scrub (MFS) that is in the table.
6. Figure 4.3-5A shows wet meadow when Figure 4.3-4 shows the same polygon as NNG. It is also not clear if the Native Grassland (NG) in Table 4.3-3 is the same as the wet meadow and/or NNG, and why NG would be CDFG and City jurisdiction in the table, but only City jurisdiction on Figure 4.3-5A.
7. Figure 4.3-4 does not show existing unvegetated streambed.
8. Fresh Water Marsh (FWM) on Figure 4.3-5B is not shown on Figure 4.3-4.
9. Table 4.3-2 breaks out impacts by canyon, but Table 4.3-3 does not do this. Breaking out the impacts by canyon between alternatives will facilitate a more accurate comparison of the alternatives.
10. Impacts from the Limited Roadway Changes (LRC) alternative should be shown on figures to allow the reader to clearly understand the areas of jurisdictional waters that will be impacted by this alternative.
11. Impacts from the LRC alternative in Table 4.3-7 are different than those in Table 4.3-5. It appears that the acreage of impacts to FWM have been transposed between temporary and permanent impacts. Other tables (e.g., Table 4.3-9) also have this discrepancy.

The draft EIR does not discuss direct and indirect impacts that may result from dewatering activities. For example, will dewatering activities dry-up the wet meadow in Rose Canyon? The document needs to clearly identify the level of dependence on surface and ground water, by plant community, and direct and indirect impacts from dewatering activities. The document should look at dry, wet, and average rain years to assess potential impacts.

The draft EIR also provides no discussion of how stream flows in Rose and Sycamore Canyons will be rerouted during construction activities; impacts within, upstream, and downstream of the project area; and proposed and alternative construction methods to reduce impacts from stream rerouting. Without this information, the full nature and extent of impacts resulting from project alternatives cannot be ascertained.

The EIR should also look at alternative access routes and construction activities to minimize overall impacts to jurisdictional waters. The document should also provide one summary table that allows the reader to easily compare impacts to jurisdictional waters from each of the alternatives.

The EIR needs an expanded discussion regarding the SWS that was restored as a result of a grant. The City of San Diego applied for, and received, a grant from the California Department of Parks and Recreation Habitat Conservation Fund Program for Riparian Enhancement/Restoration at Rose Canyon Open Space Park. The grant was to remove nonnative vegetation and replant the areas with appropriate native vegetation. It appears that portions of Rose Creek that was restored through this grant will be impacted by the Regents Road Bridge alternative, and possibly other alternatives. The EIR needs to clearly delineate the restoration areas on a figure and show and discuss direct and indirect impacts that would occur with each project alternative. Furthermore, the EIR needs to clearly discuss how the City of San Diego will rectify these impacts with the assurances required as part of the grant. The California State Parks procedural guidance requires assurances that the "Applicant will maintain and operate the property acquired, rehabilitated, or restored with the funds in perpetuity." Furthermore, the guidance requires assurances that the "Applicant will use the property only for the purposes of the California Wildlife Protection Act of 1990 and to make no other use, sale, or other disposition of the property except as authorized by specific act of the Legislature."

The City of San Diego also implemented mitigation within Rose Canyon for impacts associated with the 1996 trunk sewer project. The Regents Road Bridge alternative, and possibly others, could result in impacts to the mitigation area. The EIR needs to clearly delineate the mitigation area(s) on a figure and show and discuss direct and indirect impacts that would occur with each project alternative. Furthermore, the EIR needs to state if the mitigation area was to be preserved in perpetuity as part of the ACOE, CDFG, and/or Regional Board permits. If the mitigation area and/or grant restoration area are required to be preserved in perpetuity, it does not seem likely that alternatives that would impact the areas would be viable.

MITIGATION MEASURES

The draft EIR defers the identification of specific mitigation measures to the permitting process. This is in direct contravention of the CEQA guidelines (CEQA Guidelines § 15126.4 and 15126(e)) and defeats the purposes of CEQA. Accordingly, each significant impact should have

clearly defined, detailed description of mitigation measures proposed to minimize significant effects to water quality and beneficial uses (CEQA § 21100(b)(3)). CEQA Guidelines § 15126.4(a) state:

(1) An EIR shall describe feasible measures which could minimize significant adverse impacts, including where relevant, inefficient and unnecessary consumption of energy.

(A) The discussion of mitigation measures shall distinguish between the measures which are proposed by project proponents to be included in the project and other measures proposed by the lead, responsible or trustee agency or other persons which are not included but the lead agency determines could reasonably be expected to reduce adverse impacts if required as conditions of approving the project. This discussion shall identify mitigation measures for each significant environmental effect identified in the EIR.

(B) Where several measures are available to mitigate an impact, each should be discussed and the basis for selecting a particular measure should be identified. Formulation of mitigation measures should not be deferred until some future time. However, measures may specify performance standards which would mitigate the significant effect of the project and which may be accomplished in more than one specified way.

Moreover, the lack of specific mitigation measures only serves to heighten the significance of the impacts because the City has not identified any measures that will mitigate significant impacts. The EIR needs to clearly identify mitigation site(s); mitigation site conditions and relationship to the impacted area(s); proposed mitigation activities (e.g., grading for creation, removal of exotic species for enhancement); success criteria; implementation schedule; remedial measures; and a qualitative and quantitative discussion of functions at the impact and mitigation areas. Identification of mitigation sites is particularly important for the City given their recent difficulties in identifying appropriate mitigation sites for impacts resulting from other City projects.

The wetland habitat mitigation table (Table 4.3-13) in the draft EIR is inadequate. The table needs to identify permanent and temporary impacts by plant community for each alternative; specific mitigation ratios; and whether mitigation is creation, restoration, or enhancement. The table also needs to separate-out impacts to the areas restored as mitigation for the trunk sewer project and grant project as, if impacts are legal, mitigation ratios will be significantly higher than those proposed for other areas. Out-of-kind mitigation is also likely to result in higher mitigation ratios.


The Regional Board recommends that the City correct all deficiencies in the draft EIR to provide the public and reviewing agencies with an accurate and complete description of the project, its

February 28, 2005

impacts, and specific mitigation measures. We also recommend that the City select an alternative that avoids impacts to waters of the U.S. and State, as the draft EIR has not demonstrated that impacts would not be significant; would be mitigated; and would be legal in areas restored as part of the grant and previous mitigation activities.

If you have any questions regarding this letter, please contact Ms. Stacey Baczkowski at 858-637-5594 or sbaczkowski@waterboards.ca.gov.

Respectfully,


John H. Robertus
Executive Officer

cc: California Department of Fish and Game; Ms. Elizabeth Lucas
U.S. Fish and Wildlife Service; Ms. Carolyn Lieberman



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In Reply Refer to: FWS-SDG-3970.2

Ms. Martha Blake, Associate Planner
City of San Diego
Development Services Center
1222 First Avenue, MS 501
San Diego California 92101

Re: Draft Environmental Impact Report for the University City North/South Transportation
Corridor Study (SCH# 2004031011)

Dear Ms. Blake:

The U.S. Fish and Wildlife Service (Service) and the California Department of Fish and Game (Department), collectively the "Wildlife Agencies," have reviewed the above-referenced draft Environmental Impact Report (DEIR) for the University City North/South Transportation Corridor Study (Transportation Study), which we received on November 29, 2004, and the Errata to the DEIR which we received on February 24, 2005. The Errata included a notice of extension of review of the DEIR, establishing the end of the public review period as April 14, 2005. We also attended the City of San Diego's (City) December 9, 2003, pre-application meeting on the proposed project, and commented on the Notice of Preparation (NOP) of the DEIR in a letter dated April 15, 2004. We appreciate the opportunity to comment on the DEIR. Based on the information provided herein, the Wildlife Agencies strongly recommend that the City eliminate the Regents Road Bridge from further consideration as a viable alternative to address the traffic congestion in the UC North/South Transportation corridor. Accordingly, the City should process an amendment to the University Community Plan to remove this bridge from the Plan's Transportation Element.

The Department is a Trustee Agency and a Responsible Agency pursuant to the California Environmental Quality Act, Sections 15386 and 15381, respectively. The Department is responsible for the conservation, protection, and management of the state's biological resources, including rare, threatened, and endangered plant and animal species, pursuant to the California Endangered Species Act and other sections of the Fish and Game Code. The Department also administers the Natural Community Conservation Planning program. The primary concern and mandate of the Service is the protection of public fish and wildlife resources and their habitats. The Service has legal responsibility for the welfare of migratory birds, anadromous fish, and endangered animals and plants occurring in the United States. The Service is also responsible for administering the Endangered Species Act of 1973, as amended (16 U.S.C. 1531 et seq.).



PROJECT OVERVIEW

Project Description

The Transportation Study evaluates several transportation alternatives intended to relieve traffic congestion, in particular, within and between the southern and northern portions of the community of University City in the City. The purpose of the DEIR is to provide an analysis of seven of the alternatives and any impacts that may result from their implementation to allow the decision-maker (i.e., the City Council) to select an alternative for implementation. The DEIR does not recommend one alternative over another, and indicates that, due to the general nature of the DEIR, additional environmental review may be required, and additional mitigation measures with a higher degree of specificity could be required in conjunction with discretionary permits (e.g., Streambed Alteration Agreement from the Department).

Alternatives

The seven alternatives described and analyzed in the DEIR are the following:

1. Genesee Avenue Widening (GAWA), which would expand this roadway from four to six lanes between State Route (SR) 52 and Nobel Drive, and would take roughly two years to complete;
2. Regents Road Bridge (RRBA), which would extend across Rose Canyon to connect the existing termini of that street at the north and south rims of the canyon, and would take one year to complete;¹
3. Genesee Avenue/Governor Drive Grade Separation, which would reconstruct the present intersection of these two streets to create an underpass beneath Governor Drive to accommodate through-traffic on Genesee Avenue;
4. Combination of the Regents Road Bridge and the Genesee Avenue Widening (no Grade Separation);
5. Combination of the Regents Road Bridge and the Genesee Avenue/Governor Drive Grade Separation (no Genesee Avenue Widening);
6. Limited Roadway Changes (LRCA), which would construct an additional eastbound left-turn lane along the south-bound Genesee Avenue and Regents Road at their respective interchanges with SR52; and

¹ The RRBA would be over 1500 feet long, with the portion of the road on fill being 700 feet long and the span being 870 feet long. The maximum height of the bridge above the canyon floor would be 60 feet and the total width of the decks, including the 10-foot wide span between them, would be approximately 94 feet. The fill would be in a tributary canyon to Rose Creek and the coastal sage scrub on one of the slopes of this canyon supports one of the pairs of the California gnatcatchers that would be affected.

- 7. No Project, which would include none of the previous alternatives, but assumes the implementation of the: (a) roadway changes in the University City Facilities Benefit Assessment plan; (b) San Diego Association of Government’s revenue constrained 2030 Regional Transportation Plan improvements; (c) improvements to the La Jolla Village Drive / Interstate 805 interchange; (d) widening of Genesee Avenue from Regents Road to Interstate -5; and, (e) improvements to the Genesee Avenue / Interstate 5 interchange.

Alternatives 1 through 5 would include the project elements associated with the LRCA (i.e., alternative 6), and alternatives 1 through 6 are the action alternatives, as opposed to the No Project (i.e., no action) alternative.

Biological Impacts

Based on the DEIR and its associated biological resources report (Merkel & Associates, Inc. September 29, 2004, #02-099-01, Appendix C to the DEIR), biological impacts would occur with the implementation of the GAWA, the RRBA, and the combined GAWA/RRBA, all three of which include the roadway changes in the LRCA.

Portions of the study area are within the Multiple Habitat Planning Area (MHPA) of the City’s Multiple Species Conservation Program (MSCP) Subarea Plan. Specifically, these are Rose Canyon (Rose Canyon Open Space Park) and San Clemente Canyon (Marian Bear Memorial Natural Park), both of which would be affected by the RRBA and the GAWA.

The following table provides total proposed losses of habitats associated with the GAWA, RRBA, with the sensitive upland habitats broken out (i.e., in parentheses). The sensitive upland habitats that would be affected include Diegan coastal sage scrub, coast live oak woodland, native grassland, and non-native grassland. The wetland habitats that would be affected include southern cottonwood willow riparian forest, southern willow scrub, unvegetated waters of the U.S./streambed, coastal and valley freshwater marsh, and wet meadow.

Summary of Proposed Losses of Habitats in Acres¹						
	Wetlands^{2,4}		Uplands Within MHPA^{2,3}		Uplands Outside MHPA²	
	P	T	P	T	P	T
Genesee Avenue Widening	0.49	1.76	0.01 (0.003)	0.04 (0.04)	27.52 (1.39)	4.63 (3.58)
Regents Road Bridge	0.49 ⁵	1.40	1.89 (1.47)	6.4 (5.77)	4.82 (0.74)	2.29 (0.59)

1 Please see comment 2 on page 7 regarding impacts.
 2 P = permanent impacts; T= temporary impacts
 3 Numbers outside parentheses represent all habitats including sensitive habitats; numbers in parentheses represent only sensitive habitats.
 4 1.15 acres of the wetland impacts are associated with the LRCA, specifically the SR52/Genesee Avenue interchange.
 5 0.09 acre of this is southern willow scrub within a site of restoration conducted by the City with a 1997 Habitat Conservation Fund grant from the California Department of Parks and Recreation.

The DEIR identifies the sensitive species that would be directly (i.e., loss of habitat) and indirectly negatively affected by the action alternatives. The following table lists those species for the GAWA and the RRBA.

Subset of Species Observed Within the GAWA and RRBA Area of Potential Effect	
Genesee Avenue Widening Alternative	Regents Road Bridge Alternative
<p><u>would be directly affected</u></p> <ul style="list-style-type: none"> ➤ yellow warbler ➤ clay field goldenbush, CNPS List 1B <p><u>may be indirectly affected</u></p> <p>same species as listed under direct effects</p>	<p><u>would be directly affected</u></p> <ul style="list-style-type: none"> ➤ California gnatcatcher, possibly two pairs ➤ yellow-breasted chat ➤ California thrasher ➤ white-tailed kite ➤ clay field goldenbush, CNPS List 1B <p><u>may be indirectly affected</u></p> <p>same species as listed under direct effects, plus</p> <ul style="list-style-type: none"> ➤ bobcat ➤ coyote ➤ mule deer ➤ mountain lion ➤ Cooper's hawk ➤ red-shouldered hawk ➤ red-tailed hawk ➤ great horned owl ➤ barn owl ➤ yellow warbler, etc

Biological Mitigation

Among the City's proposed mitigation measures for impacts on biological resources are the following.

1. Mitigation for loss of habitat would occur at ratios consistent with the City's Biology Guidelines. Specific quantities of habitat creation, restoration, and preservation would depend on final engineering design.
2. The City would prepare a Wetland Mitigation Plan which would identify the exact amount and location of the impacted wetland habitat and identify the appropriate location for the wetland mitigation.
3. Engineering design would include measures to implement the City's MSCP Land Use Adjacency Guidelines.
4. Measures to avoid impacts during the avian breeding season, such as avoidance of removal of occupied habitat and controlling construction noise levels, would be implemented.
5. Measures to avoid impacts on nesting raptors would be implemented.
6. A survey for willoway monardella would be conducted prior to construction.

Traffic

The traffic study conducted for the DEIR modeled existing and future (year 2030) traffic conditions to determine the levels of service (LOS) of the Transportation Study's target road segments and intersections. Currently, two road segments within the study area operate at unacceptable LOS (i.e., LOS E or F). Both are on Miramar Road east of I-805, and are outside the study corridors (i.e., Regents Road and Genesee Avenue corridors). Currently, eight intersections within the study area operate at unacceptable levels. Five of these are outside of the study corridors. The following table provides the LOS of the no-project alternative, the LRCA alone, the GAWA alone, the RRBA alone, and a combination of the GAWA and RRBA, based on the modeling of the projected traffic in the year 2030.

Projected Unacceptable LOS for Year 2030		
	Road Segments	Intersections
No-Project	11	10
LRCA	11	10
GAWA	7	9
RRBA	9	9
GAWA & RRBA	7	7

As the table reflects, in 2030 the (a) no project alternative would result in having eleven road segments and ten intersections operating at unacceptable LOS, (b) LRCA along would result in having eleven road segments and ten intersections operating at unacceptable LOS, (c) GAWA alone would result in having seven road segments and nine intersections operating at unacceptable LOS, (d) RRBA alone would result in having nine road segments (seven of them the same as for the GAWA) and nine intersections (eight of them the same as the GAWA) operating at unacceptable LOS, and (e) combination of the GAWA and the RRBA would result in having seven road segments (same as for the GAWA) and seven intersections operating at unacceptable LOS.

WILDLIFE AGENCIES' COMMENTS

The comments provided herein are based on the information provided in the DEIR, the Wildlife Agencies' knowledge of sensitive and declining vegetation communities and species in the City, and our participation in regional conservation planning efforts. As the alternatives whose implementation would result in biological impacts are limited to the GAWA and the RRBA, both of which include the roadway changes in the LRCA, we restrict our comments to these alternatives.²

It is evident from the information provided in the project overview that, of the two action alternatives described, the GAWA would have substantially fewer and less significant biological impacts than the RRBA. The biological resources report states, the RRBA "would result in the

² We do not directly address the alternative that combines the GAWA and the RRBA. It is understood that the biological impacts associated with both alternatives would occur if the combination is implemented.

highest impacts to biological resources, and ultimately would result in the bulk of the mitigation requirements.” Of these two alternatives, the GAWA is also the alternative that would most effectively meet the project purpose.

If the City selects the RRBA or the GAWA for further consideration, additional environmental documentation should be prepared, and particularly for the RRBA, the Wildlife Agencies request that City coordinate with us regarding measures to avoid and minimize the biological impacts on the MHPA, the federally listed threatened California gnatcatcher (*Polioptila californica californica*) and other MSCP covered species, wetlands, and other sensitive habitats and species. At that time, we will discuss avoidance and minimization measures and measures necessary to adequately mitigate for the direct and indirect impacts of the RRBA or the GAWA. Therefore, we provide only limited recommendations in the letter about avoidance, minimization, or mitigation measures additional to those described in the DEIR. Our primary intent now is to discuss biological impacts which the DEIR either inappropriately dismissed as not significant or disregarded.

While the ensuing comments address the biological impacts associated primarily with the RRBA, we request that this not be construed as supportive of the implementation of the GAWA or any other alternative. The GAWA alternative would result in significant losses of wetlands, largely attributable to the construction associated with the LRCA (also common to the RRBA), and would also affect wildlife movement.

Direct Impacts

1. We recognize that the MSCP Subarea Plan allows for the placement of roads within the MHPA if they are identified in a community plan, as is the case for the Regents Road Bridge in the University Community Plan. Such roads must conform to the General Planning Policies and Design Guidelines in the Subarea Plan. Two of these Policies are that: (a) construction and maintenance activities in wildlife corridors must avoid significant disruption of corridor usage; and, (b) development in canyon bottoms should be avoided when feasible, and bridges are the preferred method for providing for wildlife movement.

The fundamental premise of the General Planning Policies and Design Guidelines is to avoid unnecessary substantial biological impacts within the MHPA. While they encourage the use of bridges instead of roads that traverse canyon floors, clearly, if there is one or more biologically preferable alternative that would meet or surpass the needs of a project for which a bridge is considered, that alternative would be the appropriate one to pursue relative to preserving the biological integrity of the MHPA. Such an alternative to the RRBA is the GAWA. Nevertheless, the DEIR is silent on the second Policy identified above despite the substantial potential direct and indirect negative biological impacts associated with the RRBA (see subsequent additional comments).

We disagree with the conclusion in the DEIR that the RRBA would be consistent with the first Policy. The RRBA would negatively affect a wildlife corridor and an extensive riparian woodland system, particularly during construction. Medium-to-large sized mammals

including coyote, bobcat, mule deer, and possibly mountain lion, currently utilize Rose Canyon. The magnitude and the duration of the staging, access, and construction activities would result in significant disruption of corridor usage by wildlife. For example, the entire wildlife corridor through Rose Canyon would be obstructed during the construction of the bridge (at least one year). The resulting disruption of wildlife movement would be a significant and unmitigable impact (biological resources report, page 77). However, this would be avoided if the RRBA were not built. The 8.29 acres of upland impacts on the MHPA would also be avoided. By comparison, the GAWA would affect an estimated 0.05 acre of upland habitat within the MHPA and not result in unmitigable significant impacts to a wildlife corridor.

2. We are concerned that the City Council will not have the correct information regarding the habitat losses associated with each action alternative. There are many discrepancies among the acreages of impacts in the tables in the DEIR and the biological resources report. We realize that the quantities of habitat losses could change with further engineering design. However, for the City Council to make an informed decision about which action alternative, if any, to consider further, they need to know the impacts determined to date.

Our understanding is that the GAWA and RRBA would include all the components of the LRCA (i.e., not that the GAWA would include only the LRCs at the SR52/Genesee Avenue interchange, and not that the RWBA would include only the LRCs at the SR52/Regents Road interchange) (page 3-36 of the DEIR). It appears that many of the acreage discrepancies derive from inconsistencies in how the impacts from the LRCA were accounted for in the GAWA and RRBA. It seems that in most, if not all, of the tables of habitat losses for the GAWA and RRBA, only some or none of the losses from the LRCA have been accounted for. For example, our interpretation of the approach used in the biological resources report to tally the impacts (page 3 of the report, under alternative 7) is that the impact acreages for the GAWA include the impacts from only the SR52/Genesee Avenue components of the LRCA, and the impact acreages for the RRBA include no impacts from the LRCA.

Just one example of the confusion about the proposed losses of habitat follows. Table 4.3-5 indicates that the combined temporary and permanent wetland impacts from the LRCA would be 1.23 acres. Therefore, since all the action alternatives would include all the components of the LRCA, the proposed wetland impacts for the GAWA and the RRBA should be at least 1.23 acres. While Table 4.3-7 indicates that the wetland impacts for the GAWA would be 2.27 (Department impacts), Table 4.3-9 indicates that the wetland impacts for the RRBA would be 1.33. Given that the wetland impacts from the construction of only the Regents Road Bridge would be 0.74 acre (Table 13 in the biological resources report), the impact of the RRBA would be at least the sum of 0.74 acre and 1.23 acres for a minimum total of 1.97 acres. Thus the value of 1.33 in Table 4.3-9 for impacts to wetlands from RRBA is incorrect.

The values in the table of habitat losses on page 3 of this letter are based on our efforts to reconcile the discrepancies in the DEIR and the biological resources report. Please note that 1.15 acres of the wetlands losses are attributable solely to the SR52/Genesee Avenue interchange component of the LRCA which is common to both the GAWA and the RRBA

(Table 4.3-5). We request that this matter of the acreages of habitat losses be resolved and the revised data be provided to the City Council before they consider the alternatives, so that they can have the information needed to make an informed decision. The final EIR should reconcile the discrepancies, and adjust the mitigation requirements as necessary, acknowledging that the mitigation for wetlands would ultimately be determined by the resource agencies in whose jurisdiction the wetland impacts occur.

3. The DEIR mentions the hydraulic constraint posed by the Genesee Avenue bridge over Rose Creek. Downstream of Genesee Avenue, the 100 year floodplain is approximately 70 feet wide, compared to 300 feet wide several hundred feet upstream. Under Genesee Avenue, Rose Creek is confined to box culverts subject to sediment accretion.³ The biological resources report indicates that wildlife passage in this area of Rose Canyon is also restricted under the bridge to an approximately 30-foot wide area north of and adjacent to the railroad tracks for a length of 94 feet (i.e., width of the bridge). The biological resources report and DEIR indicate that the GAWA would widen Genesee Avenue from 92 to 102 feet over the railroad tracks in Rose Canyon, and conclude that impacts resulting from the widening would be only incremental and would not add any new permanent significant impact. Given the already constrained space for wildlife movement in this area and the importance of maintaining adequate connections within open space areas and preserves to preserve biological diversity and population viability, we disagree with the conclusion that the incremental impacts would not be significant.

The current condition at the Genesee Avenue bridge over Rose Creek provides, at best, a tenuous, wildlife movement linkage between the west and east side of Genesee Avenue. It is a critical pinch point in the wildlife movement corridor extending through Rose Canyon between Interstate-5 and Genesee Avenue and on to the open space areas on the Marine Corps Air Station (MCAS) to the east. In turn, these areas on the MCAS provide wildlife movement corridors through to Mission Trails Regional Park, Sycamore Canyon County Park, Marian Bear Regional Park, and Los Penasquitos Canyon Preserve.

If the City selects the GAWA for further consideration, we recommend that the alternative be designed to replace the existing culverts with a design that is more conducive to wildlife passage and to reducing the hydraulic constraint. The MSCP Subarea Plan states, "If roads cross the MHPA, they should provide fully-functional wildlife movement capability." Implementation of the GAWA would be an ideal opportunity to greatly improve the wildlife movement linkage at this pinch point. In our NOP letter, we asked that the EIR describe how the box culverts under Genesee Avenue (now at least 94 feet long and proposed to be at least 104 feet long), would be improved for wildlife movement, and that the discussion of measures to improve the undercrossing include measures to attenuate noise from traffic. The DEIR addresses neither. Regardless of whether the City selects the GAWA to consider

³ A site visit on March 31, 2004, revealed that, though the box culverts are at least 6 feet high, at that time they had water in them except where sediment had collected. In some areas of sediment accretion, the sediment was so high as to dissuade or prevent wildlife (even small to medium-sized mammals) from passing through.

further, the culverts should be cleaned out on a regular basis so that they can provide optimal biological and hydraulic functions.

4. The DEIR indicates that project construction is expected to occur outside of the avian breeding season, thereby avoiding impacts on breeding behavior. The DEIR also indicates that the GAWA and the RRBA would take two years and one year, respectively, to construct. The final EIR should elaborate on the project duration. For example, please explain whether the one-year project construction period would actually be approximately 18 to 20 months to accommodate avoidance of avian breeding season (e.g., for raptors, February 1 through August 30). If the durations of project construction would be extended, consideration must be given to the increased duration of construction-related biological impacts such as impairment of wildlife movement through Rose Canyon in the area of the Regents Road bridge.
5. The RRBA would affect 0.09 acre of southern willow scrub within a site of restoration conducted by the City with funding from the California Department of Parks and Recreation (DPR) Habitat Conservation Fund Program (HCFP). This area is also within the MHPA. The DPR's procedural guide for the HCFP (May 1997), states, "applicant will maintain and operate the property acquired, developed, rehabilitated, or restored with the funds in perpetuity..... [and] make no other use, sale, or other disposition of the property except as authorized by specific act of the Legislature." In our NOP letter, we stated, "if the City committed to preserving the restoration in perpetuity, and the Regents Road Bridge alternative could not be designed to avoid (including shading and indirect impacts) the restoration area, the DEIR should explain why the [RRBA] is among the alternatives being studied." The DEIR does not respond to this query, and though it briefly describes the purpose of the restoration, it provides no justification for or evidence of being relieved from meeting DPR's requirements. We request that the City now respond to our query.
6. Considering that neither the types nor locations of the construction and post-construction best management practices (BMPs) have been determined, the losses of habitat are not entirely accounted for in the DEIR. We appreciate the general nature of this DEIR. However, it is unclear how the City Council will be fully informed to make a decision-about which alternative, if any, to consider further without knowing the habitat loss impacts. BMPs can occupy, and result in loss or degradation of habitat in, considerably large areas. Such potential losses are unaccounted for in the DEIR, as are also the potential impacts from the on-going long-term BMP maintenance which can be a source of disturbance (i.e., indirect effects) to sensitive wildlife species.

Edge Effects / Indirect Impacts

Generally, the DEIR does not adequately analyze the potential biological impacts from edge effects resulting from the RRBA. This alternative would introduce or exacerbate several potential indirect / edge effects into Rose Canyon where they either don't now exist or exist to a lesser degree than they would with the bridge. Edge effects are defined as undesirable anthropogenic disturbances beyond urban boundaries into potential reserve habitat (Kelly and

Rotenberry 1993). Edge effects, such as disturbance by humans, noise, and lighting, and decreases in avian productivity (Andren and Angelstam 1988), line-of sight disturbances, air- and water-borne contaminants associated with vehicles (air pollution can degrade vegetation), and fugitive dust during both construction and operation, are all documented effects that have negative impacts on sensitive biological resources in southern California. Edge effects can penetrate up to 200 meters from the actual reserve boundary (CBI 2000).

In part because the DEIR does not provide sufficient specific information about the RRBA, we are unable to demonstrate unequivocally that the edge effects we discuss below would, singly or in conjunction with each other, have significant impacts on sensitive wildlife species and the MHPA. However, considering the information in the following comments, we believe that there is ample reason for concern regarding the bridge's long-term biological impacts, and consider it likely that the edge effects of the RRBA would significantly compromise the biological integrity of Rose Canyon and the MHPA within it, and would significantly negatively affect the sensitive wildlife species that reside in or migrate through it. We must consider these impacts because we are responsible for the biological welfare of all species listed under the Migratory Bird Treaty Act, and other species of concern, including the MSCP-covered species, and partially responsible to protect the biological integrity of the MHPA. We recommend that the final EIR thoroughly address the ensuing issues we raise.

Noise

The DEIR states the following regarding the potential biological impacts from noise and lights.

Permanent, indirect impacts in the long-term, taking the form of noise and light (headlights at night), from the widened Genesee Avenue bridge would be additive to the current roadway use impacts, they would be incremental and would not be considered significant for the widening project (page 4.3-44).

Permanent, indirect impacts in the long-term, taking the form of noise and light (headlights at night) on the new bridge from the widened Regents Road Bridge would not be significant (page 4.3-52).

We agree with the conclusion regarding the significance of the incremental impacts from noise and light that would result from the GAWA. However, we disagree with the statement about the significance of the potential biological impacts of lighting (see next comment) and noise resulting from the RRBA, and believe that the following statement in the biological resources report more accurately reflects the potential impacts.

...lighting and noise could potentially have an indirect but significant impact on the wildlife in residence and moving through the canyon in the vicinity of the bridge (page 63).

The DEIR indicates that the area where the Regents Road bridge would be built would experience an increase of approximately 12 decibels A-weighted [dB(A)],⁴ from a predicted future No Project level of 59.6 dB(A) to future noise level with the bridge of 71.8 dB(A), and that the 65 dB(A) CNEL⁵ contour may extend as far as 240 feet from the centerline of the bridge in the residential areas north and south of Rose Canyon. In a condition where the roadway and receiver are at grade and the ground is vegetated, the 65 dB(A) CNEL contour distance would be 140 feet from the centerline when there is no intervening obstruction.⁶ The current peak hourly noise level on the canyon floor in this area, south of the tracks, is 55-56 dB(A) Leq. Preliminary research suggests that noise levels in excess of 60dB(A) L_{eq}⁷ hourly can adversely affect avian species such as the coastal California gnatcatcher (Awbrey 1993) and least Bell's vireo [(*Vireo bellii pusillus*: vireo) (Regional Environmental Consultants and San Diego Association of Governments 1990).⁸ Notwithstanding that the dB(A) and CNEL units of measure, or the thresholds typically used for human sensitivity, may not be appropriate for application to all sensitive wildlife receptors, we are concerned about the potential long-term biological impacts primarily on avian species in the canyon from the traffic-generated noise emanating from the bridge. The noise levels in the canyon would be higher than the levels provided above for the residential areas. Birds that now use the forest canopy and other lower vegetation (as the bridge descends towards its northern and southern termini) within 240 feet (or greater, depending on the noise levels in the canyon) of the bridge may abandon these habitats as a result of the increase in noise levels, either alone or in conjunction with other bridge-related impacts (e.g., lights, line-of-sight disturbances), or minimally no longer use the habitat during the breeding season.

Avian hearing is critical for mate selection, territorial defense, and predator selection. Sound distortion may make it hard for prospective mates to determine the quality of others' songs. This may make females tend to choose mates from less noisy areas, affecting nesting patterns. Noise in excess of 60 dB(A) L_{eq} can mask the song of a male birds, thereby inhibiting his chance of attracting a mate. Reduced communication distance may make it harder to locate mates or make prospective mates perceive the calls of suitors as weaker than those of suitors in less noisy areas. It also reduces the area a bird can effectively defend, making the bird less attractive as a resource

⁴ A-weighting refers to an electronic filter applied to sound pressure level measurements. It discriminates against low frequencies so that the sound measurements correspond more closely to the response of human hearing to many types of noise.

⁵ Community noise equivalent level: Twenty-four-hour average A-weighted sound level for a given day, after addition of five decibels to sound levels between 1900 and 2200 hours, and ten decibels to sound levels between 0000 and 0700 hours and between 2200 and 2400 hours.

⁶ Elsewhere, the DEIR indicates that traffic noise levels on the canyon floor would not exceed 60 dB(A) Leq (page 5.3-52). However, no explanation as to how this is derived is provided.

⁷ Leq = equivalent noise level. The Leq is a hypothetical steady state noise level that in a stated period of time contains the same average A-weighted noise energy as a measured varying sound at the stated level.

⁸ We acknowledge that vireo were not detected during surveys conducted in the Rose Canyon study area. We include them here only for purposes of illustration.

provider. Noise can also mask the vocalizations of vireos signaling the presence of a predator (Regional Environmental Consultants and San Diego Association of Governments 1990). Furthermore, energetic costs from behaviors associated with noise may lead to a reduction in weight gain (Ward and Stehn 1989), which may decrease reproductive fitness. Noise may also result in immediate and long-term behavioral responses (e.g., flushing vs. permanent abandonment of an area), acute and/or chronic physiological responses (e.g., heart rate increase vs. increases in the release of adrenocorticotrophic hormone; fluctuating asymmetry, Palmer 1996), or demographic parameters (e.g., survival or reproduction).

The lowest sections of the bridge would be near the California gnatcatcher habitat which would be subject to considerable increases in operational (i.e., traffic) noise during the breeding season. We are concerned that, if the species persists in these territories throughout the construction period, the noise generated by traffic during the breeding season may cause gnatcatchers to abandon their territories, or may diminish breeding success. As these territories are within the MHPA, we would consider such loss unnecessary because other alternatives exist that avoid take of this species. Individuals of all the species listed in the table on page 3 might be similarly affected, including the Cooper's hawk, an MSCP-covered species, and the other raptorial species.

Lighting

The DEIR states the following regarding the potential biological impacts from lights.

Mitigation for alternatives that include the Regents Road Bridge require lights on the bridge to be shielded such that light would be directed away from the MHPA (page 4.3-53).

With the MHPA and sensitive habitats surrounding the Regents Road Bridge, it would be difficult, if not impossible, to orient the lights on the bridge in a manner that obstructs all light from reaching the wildlife that resides there. And, while the proposed barriers on both sides of the Regents Road Bridge would shield headlights from the canyon floor, as suggested in the DEIR, the glow cast from the headlights and the lights on the bridge would spill into the sensitive habitats. In an area that now experiences minimal urban lighting (sky glow) and no direct lighting, this would likely constitute a significant biological impact, as discussed below.

Illumination of riparian corridors by night lighting has the potential to adversely affect birds. Physiological, developmental, and behavioral effects of light intensity, wavelength, and photoperiod on bird species are well-documented. In the wild, urban lighting is associated with early daily initiation of avian song activity (Bergen and Abs 1997). Avian species are known to place their nests significantly farther from motorway lights than from unlighted controls (de Molenar et al, 2000). Placement of nests away from lighted areas implies that artificial light renders part of the home range less suitable for nesting. If potential nest sites are limited within the bird's home range, reduction in available sites associated with artificial night lighting may cause the bird to use a suboptimal nest site that is more vulnerable to predation, cowbird

parasitism,⁹ or extremes of weather. Artificial lighting generally threatens wildlife by disrupting biological rhythms and otherwise interfering with the behavior of nocturnal animals (contributions from Artificial Night Lighting Conference, 2002). Nocturnal and migrating birds, migrating bats, insects, fish, and amphibians are particularly affected by artificial night lighting (Evans Ogden 1996 and citations therein). Billions of moths and other insects are killed from lights each year. Nocturnal birds use the stars and moon for navigation during migrations. When these birds fly through a brightly lit area, they can become disoriented, which can lead to injury and/or death. In addition, artificial lighting can affect aquatic invertebrates that are prey for other animals. Other references that may provide useful insight into the analysis of indirect impacts include Longcore and Rich (2001) and the National Cooperative Highway Research Program (2002).

Other Indirect Impacts

Other potentially significant indirect biological impacts associated with RRBA about which we are concerned include avian collisions with vehicles on the bridge and hydrological modifications of Rose Creek and its floodplain during and after construction. We recommend that the final EIR fully evaluate and disclose these impacts.

Mitigation

Again, if the City selects the RRBA or GAWA for further consideration, the Wildlife Agencies request that City coordinate with us regarding measures to avoid and minimize the biological impacts on the MHPA, California gnatcatcher and other MSCP covered species, wetlands, and other sensitive habitats and species. At that time, we will discuss measures necessary to adequately mitigate for the direct and indirect impacts of the RRBA or GAWA. Our preliminary comments on the proposed mitigation follow.

1. We are concerned about the difficulty of finding adequate mitigation sites for the amount of wetland mitigation that would be needed for the GAWA and/or the RRBA. The DEIR provides no details about where the mitigation might occur. We agree with, and incorporate by reference, the Regional Water Quality Control Board's comments (February 28, 2005, letter on the DEIR) regarding the inappropriate deferral of identifying specific mitigation measures, as the comments apply to the omission of adequate specific information on mitigation sites for habitat losses.
2. If the proposed mitigation could cause biological impacts (e.g., removal of sensitive upland habitats for the creation of wetlands), additional CEQA analysis and review would be warranted [CEQA Guidelines, section 15126.4(a)(D)], and additional mitigation may be necessary. Again, it is unclear how the City Council will be fully informed to make a decision-about which alternative, if any, to select without this information.

⁹ Brown-headed cowbirds were observed in the proximity of the Regents Road Bridge.

3. The DEIR indicates that the mitigation for the temporary loss of wetlands would be at a ratio of 1:1. It is likely that the Department will require at least a 2:1 ratio for the temporary losses of wetlands, particularly considering the duration and nature of the temporary losses. For example, the construction access and staging areas for the RRBA would disrupt the functions and values of the mainstem of Rose Creek and its associated riparian habitat during the construction of the RRBA, which would last at least one year.
4. Depending on the duration of the temporary loss of coastal sage scrub and other sensitive upland habitats, particularly within the MHPA, it may be appropriate to mitigate at a ratio greater than 1:1 and to fulfill any off-site mitigation requirement prior to or during project-construction.
5. The final EIR should require and fully describe methods to attenuate project-related construction and operational noise levels in excess of ambient levels at the edge of sensitive habitats to avoid or minimize further degradation of habitat for wildlife, particularly avian species.
6. The proposed mitigation measure to protect raptors during the breeding season may be insufficient. In southern California, Cooper's hawks are known to lay their eggs as early as the end of January (Unitt 2004), which indicates that they start building their nests earlier. Therefore, since this species likely nests on site (page 22 of the biological resources report), the construction avoidance period should be adjusted to begin at the latest by January 1. In addition, the MSCP Subarea Plan requires that area specific management directives for the Cooper's hawk must include a 300-foot impact avoidance areas around active nests and minimization of disturbance in oak woodlands and oak riparian forests.¹⁰ These requirements apply to both construction and post-construction (i.e., once the bridge is being used) impacts.

Conclusion

Based on the preceding discussion, we strongly recommend that the City eliminate the RRBA from further consideration as a viable alternative to address the traffic congestion in the University City North / South Transportation corridor. Accordingly, the City should process an amendment to the University Community Plan to remove this bridge from the Plan's Transportation Element.

It remains for the City to determine whether the improvement in traffic congestion provided by any of action alternatives studied to date warrants the associated loss of sensitive biological resources and the fiscal expense, inclusive of the cost of biological mitigation. Assuming that the methodology used to model the 2030 traffic conditions is valid, it is evident from the modeling results provided in the DEIR that the GAWA would be the most effective action alternative to address traffic congestion in the study corridor. While the combination of the GAWA and the RRBA would provide two more intersections that operate at acceptable LOS

¹⁰ It is not clear from the DEIR where Cooper's hawks occur in Rose Canyon relative to the RRBA alignment.

than would the GAWA alone, the economic and biological impacts associated with the combination may render its implementation prohibitive.

We appreciate the opportunity to comment on the DEIR. The Department finds that the implementation of any of the action alternatives would not be de minimis in its effects on fish and wildlife per section 711.4 of the California Fish and Game Code. Please contact Carolyn Lieberman of the Service at (760) 431-9440, or Libby Lucas of the Department at (858) 467-4230, if you have any questions or comments concerning this letter.

Sincerely,

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U.S. Fish and Wildlife Service

Donald Chadwick
Habitat Conservation Planning Supervisor
South Coast Region
California Department of Fish and Game

cc: Department of Fish and Game (Kelly Fisher)
Regional Water Quality Control Board (Stacey Baczkowski)
State Clearinghouse
U.S. Army Corps of Engineers (Terrence Dean)

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- Ward, D. H. and R. A. Stehn. 1989. Response of brant and other geese to aircraft disturbances at Izembek Lagoon, Alaska. Minerals Management Service, Anchorage, AK, Outer Continental Shelf Office, Report No. MMS-90/0046.



U.S. Fish and Wildlife Service
Carlsbad Fish and Wildlife Office
6010 Hidden Valley Road
Carlsbad, California 92011
(760) 431-9440
FAX (760) 431-5901



CA. Department of Fish and Game
South Coast Regional Office
4949 Viewridge Avenue
San Diego, CA 92123
(858) 467-4201
FAX (858) 467-4299

In Reply Refer to:
FWS-SDG-3970.3

July 31, 2006

Ms. Martha Blake, Associate Planner
City of San Diego
Development Services Department
1222 First Avenue, MS 501
San Diego California 92101

Re: University City North/South Transportation Corridor Study

Dear Ms. Blake:

The U.S. Fish and Wildlife Service and the California Department of Fish and Game have reviewed the City's response to our comments (RTCs) on the draft Environmental Impact Report (EIR) for the University City North/South Transportation Corridor Study (Transportation Study). We understand that tomorrow the City Council will consider whether to certify the final EIR for the subject project and whether to select the Regents Road Bridge Alternative (RRBA) and initiate an amendment to remove the Genesee Avenue Widening Alternative (GAWA) from the University Community Plan. We find that the RTCs underscore our previous assessment that, because of its inadequacy, the EIR should not be certified. The RTCs also reinforce our previous recommendation that the City eliminate the RRBA (i.e., not the GAWA) from further consideration as a viable alternative to address traffic congestion in the UC North/South Transportation corridor (April 14, 2005, comment letter on the draft EIR, copy attached). Accordingly, the City should instead process an amendment to the University Community Plan to remove the bridge from the University Community Plan.

The July 26, 2006, staff Report to City Council on the RRBA seriously minimizes the biological implications of this alternative. One of the inadequate aspects of the biological impact analysis of the alternatives in the EIR is the consideration of their effects on the Multiple Habitat Planning Area (MHPA) of the City's Multiple Species Conservation Program Subarea Plan (MSCP SAP). In addition, the EIR and the RTCs fail to acknowledge that, while new roads are allowed in the MHPA, the MSCP SAP pre-supposes the selection of alternatives that satisfy the project purpose and meet the intent of the MSCP. The fundamental premise of the MSCP's General Planning Policies and Design Guidelines (Policies and Guidelines) is to avoid unnecessary substantial biological impacts within the MHPA. While they encourage the use of bridges instead of roads that traverse canyon floors, the Policies and Guidelines also require that if there is one or more biologically preferable alternative that would meet or surpass the needs of a project for which a bridge is considered, that alternative should be chosen to preserve the biological integrity of the MHPA. Such an alternative to the RRBA is the GAWA. Unfortunately, the DEIR is silent on this matter.

It is evident that the GAWA would have substantially fewer and less significant biological impacts than the RRBA, beyond those associated strictly with the MHPA. And, of these two

Ms. Martha Blake (FWS-SDG-3970.3)

2

alternatives, the results (see table below) of the City's traffic analysis indicate that the GAWA is also the alternative that would singly best meet the project purpose, if the purpose is to relieve traffic congestion, in particular, within and between the southern and northern portions of the community of University City.^{1,2} If however, the project purpose is different from that presented in the EIR, the City should formally revise it. It is important to note that the City is not obligated to select any alternative (RTC #2.29). Any improvement in traffic gained from any of the alternatives would be so marginal that it begs the question whether any would sufficiently meet the project purpose to warrant the associated expenditure of funds for its implementation.

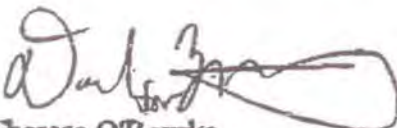
Projected Unacceptable Levels of Service for Year 2030		
	Road Segments	Intersections
No-Project	11	10
GAWA	7	9
RRBA	9	9
GAWA & RRBA	7	7

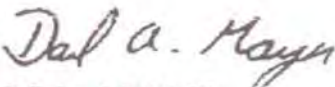
The July 26 staff Report to City Council states that the primary goal of the approach taken in the EIR "was to allow decision-makers to select an alternative based on a comparison of environmental consequences combined with social and economic factors associated with each alternative." However, the City's finding (Candidate Findings, page 41) that the GAWA is infeasible undermines the credibility of this approach and represents a contravention of CEQA which requires that alternatives be feasible (CEQA Guidelines Section 15126.6).

The City has prepared a statement of overriding considerations, though its propriety is questionable given the inadequacy of the EIR. However, there is no such relief mechanism available to the City for its obligations under the MSCP, and it is not apparent to us how the City will make the MSCP findings required to proceed with the RRBA.

In conclusion, if the City decides to implement any of the alternatives in the EIR, to be consistent with the City's MSCP SAP, it should be the GAWA. We appreciate the opportunity to comment on the subject project and the City Council's related pending considerations. Please contact Libby Lucas of the Department at (858) 467-4230 or Carolyn Lieberman of the Service at (760) 431-9440 if you have any questions or comments concerning this letter.

Sincerely,


Therese O'Rourke
Assistant Field Supervisor
U.S. Fish and Wildlife Service


FOR Michael J. Mulligan
Deputy Regional Manager
California Department of Fish and Game

¹ This statement of project purpose is based on the DEIR and the purpose as described to us when we met with the City on December 9, 2003.

² Our comment is not intended to be interpreted as confirmation that there is a need for traffic relief, and assumes that the methodology used to model the 2030 traffic conditions is valid. As we did not review the final EIR, we are not certain that these numbers have remained the same as in the draft EIR. However, the City's response to our comments did not indicate that this summary is incorrect. The main portion of the July 26, 2006, staff Report to City Council omits the results of the study, though the Candidate Findings briefly assess them (page 41).



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In Reply Refer To:
FWS-SDG-3970.1

Martha Blake, Associate Planner
City of San Diego
Development Services Center
Land Development Review Division
1222 First Avenue, MS 501
San Diego, CA 92101

APR 15 2004

Re: Comments on the Notice of Preparation of a Draft Environmental Impact Report for the University City North/South Transportation Corridor Study (SCH# 2004031011)

Dear Ms. Blake:

The U.S. Fish and Wildlife Service (Service) and the California Department of Fish and Game (Department), collectively the "Wildlife Agencies," have received (on March 30, 2004, and March 3, 2004, respectively) and reviewed the Notice of Preparation (NOP) of a draft Environmental Impact Report (DEIR) for the University City North/South Transportation Corridor Study, and the February 27, 2004, memorandum from the City of San Diego's (City) Development Service's Department to the City's Engineering and Capital Improvements Department regarding the Study (City's memo). We also attended the City's December 9, 2003, pre-application meeting on the proposed project. Because the Service did not receive the NOP until March 30, 2004, the City granted us an extension of the public comment period, until April 16, 2004 (pers. comm., electronic mail from Martha Blake, March 30, 2004). We appreciate the extension, and assume that the City will fully consider our comments in the preparation of the DEIR.

The NOP indicates that the DEIR will describe and analyze six alternatives. These are: (1) Regents Road Bridge; (2) Genesee Avenue Widening; (3) Genesee Avenue/Governor Drive Grade Separation; (4) a combination of both the Regents Road Bridge and the Genesee Avenue widening without grade separation; (5) a combination of both the Regents Road Bridge and the Genesee Avenue widening with the grade separation; and (6) No Project which assumes the implementation of only the transit improvements planned as part of the Revenue-Constrained Scenario of SANDAG's Regional Transportation Plan. The Regents Road Bridge would extend across Rose Canyon to connect the existing termini of that street at the north and south rims of the canyon. The Genesee Avenue widening alternative would expand this roadway to six lanes between State Route (SR) 52 and Nobel Drive. The Genesee Avenue/Governor Drive Grade Separation would reconstruct the present intersection of these two streets to create an underpass beneath Governor Drive to accommodate through traffic on Genesee Avenue. The first three

alternatives would include the construction of a second left-hand turn lane along south bound Genesee Avenue to east bound SR 52. Alternatives 4 and 5 would include modifications at Genesee Avenue/SR 52. The DEIR would not recommend one alternative over another, but would provide a full analysis of each, and would identify the least environmentally damaging project alternative (LEDPA). The City Council would select an alternative for implementation (either one of the 'project' alternatives or the 'no project' alternative) when they consider the EIR for certification.

Portions of the study area are within the Multiple Habitat Preservation Area (MHPA) of the City's Multiple Species Conservation Program (MSCP) Subarea Plan. Specifically, these are (1) Rose Canyon (Rose Canyon Open Space Park) which would be affected by the Regents Road Bridge and the widening of Genesee Avenue, and (2) San Clemente Canyon (Marian Bear Memorial Natural Park), which would be affected by the widening of Genesee Avenue, and the modifications along south bound Genesee Avenue at east bound SR 52.

In summary, the DEIR should adequately demonstrate the purpose and need of the proposed project, if and how each project alternative will fulfill the project's purpose and need, and adequately describe how each alternative will impact biological resources and mitigate for those impacts. We offer the following comments to assist the City in avoiding, minimizing and mitigating project impacts to biological resources.

Project Purpose, Alternatives, and the LEDPA

1. The Wildlife Agencies are concerned about the potential impacts of the alternatives on the MHPA. We are interested in knowing which alternative would most avoid or minimize the biological impacts within and adjacent to the MHPA and meet the needs of the project. In order for us and other reviewers to make this assessment, it is important that the DEIR provide the following.
 - a. The DEIR should include "a range of reasonable alternatives to the project, or to the location of the project, which would feasibly attain most of the basic objectives of the project but would avoid or substantially lessen any of the significant effects of the project [on the MHPA], and evaluate the comparative merits of the alternatives," as required by Section 15126.6 (a) of the CEQA Guidelines. The alternatives should be limited to ones that would avoid or substantially lessen any of the significant effects of the project [CEQA Guidelines, section 15126.6(f)]. For each alternative, the DEIR should provide a discussion on how each alternative would avoid or minimize significant impacts on biological resources.
 - b. DEIR should provide a very clear and detailed description of the purpose, goals, and objectives for the project, as this will be critical in determining the most appropriate alternative to address the specific traffic needs and reduce biological impacts to a level less than significant. We recommend that the transportation/circulation analysis include a

table summarizing the positive and negative effects on traffic within the alternatives' respective areas of potential effect.¹

2. Based on the December 9, 2003, meeting, we understand that the Regents Road Bridge alternative would affect an area of habitat (e.g., CSS, wetland) restoration in Rose Canyon between the mainstem of Rose Creek and the southern terminus of Regents Road. This area is within the MHPA. Furthermore, the City committed to preserving the restoration area in perpetuity by accepting funding from the California Department of Parks and Recreation (DPR) Habitat Conservation Fund Program (HCFP) to conduct the restoration. The DPR's procedural guide for the HCFP (May 1997), states, "applicant will maintain and operate the property acquired, developed, rehabilitated, or restored with the funds in perpetuity..... [and] make no other use, sale, or other disposition of the property except as authorized by specific act of the Legislature." The City's October, 1997, application to the DPR HCFP for funding this restoration, states, "all projects are within the protected boundaries of Rose Canyon Open Space Park," in response to a query about whether adjacent land use is permanent and compatible or adequate buffer zones would be established. The DEIR should briefly discuss the purpose of the restoration, and identify the City's commitments to the agency(ies) that awarded the City funding for it. If the City committed to preserving the restoration in perpetuity, and the Regents Road Bridge alternative could not be designed to avoid (including shading and indirect impacts) the restoration area, the DEIR should explain why the Regents Road Bridge is among the alternatives being studied.
3. We understand that the City's proposed LEDPA is unrelated to the LEDPA under section 404 of the Clean Water Act (pers. comm., Martha Blake, 4/12/04). To enable reviewers to fully understand how the LEDPA is determined, we recommend that the DEIR:
 - a. identify and thoroughly describe the criteria used to determine the LEDPA (LEDPA criteria); there should be separate criteria for each issue area (e.g., Landform Alteration/Visual Quality," "Traffic/Circulation," "Biological Resources");
 - b. explain the reasoning for each alternative's ranking in each LEDPA criterion;
 - c. describe why the LEDPA, irrespective of other alternatives to the project, is consistent with and appropriate in the context of the MSCP Subarea Plan; and
 - d. contain a matrix that summarizes each of the alternative's rankings in each of the LEDPA criteria.
4. The LEDPA criteria should encompass the issues identified by section 15126.6(f)(1) of the CEQA Guidelines which states, "Among the factors that may be taken into account when addressing the feasibility of alternatives are site suitability, economic viability, availability of infrastructure, general plan consistency, other plans or regulatory limitations, jurisdictional

¹ The DEIR should identify and provide the purpose and a brief description of each of the transit improvements planned as part of the Revenue-Constrained Scenario of SANDAG's Regional Transportation Plan, within the study areas for each of the alternatives.

boundaries (projects with a regionally significant impact should consider the regional context), and whether the proponent can reasonably acquire, control or otherwise have access to the alternative site (or the site is already owned by the proponent).” As to economic viability, the DEIR should identify the cost of each alternative, including the estimated cost of all mitigation that would be required (see comment #15).

Impact Analysis

5. The DEIR should address how the MSCP Subarea Plan and associated Implementing Agreement (IA) influences the following issue areas: “Land Use,” “Landform Alteration/Visual Quality,” “Traffic/Circulation,” “Biological Resources,” “Drainage/Urban Runoff/Water Quality,” “Noise,” “Growth Inducement” and “Cumulative Effects.”
6. The DEIR must ensure and verify that the implementation of any of the alternatives would meet all the requirements and conditions of the City’s MSCP Subarea Plan and IA. The DEIR should also address biological issues that are not addressed in the MSCP Subarea Plan and IA, such as specific impacts to and mitigation for wetlands or sensitive species and habitats that are not covered by the Subarea Plan and IA. For example, the DEIR should address whether any potential take of MSCP-covered species [e.g., coastal California gnatcatcher (*Polioptila californica californica*, gnatcatcher) and the least Bell’s vireo (*Vireo bellii pusillus*, vireo)] would be in conformance with the MSCP.
7. The City’s memo states, “at the time that the project is proposed for construction, development, and/or a community plan amendment, further project review would occur and any required permits would be sought. This would include further public involvement, review, and would be subject to further public hearings.” We assume that “further project review” does not refer to additional CEQA documentation, and that the DEIR will provide an impact analyses for each of the alternatives that is sufficiently thorough for reviewers to provide informed comments and for the City Council to make a fully informed decision. Please clarify whether additional CEQA documentation would be prepared.
8. For each alternative’s area of potential effect (APE), the DEIR should identify the listed species, California Species of Special Concern, and all other sensitive species for which the habitat within the APE is suitable. In addition, the DEIR should identify species observed during current (i.e., within a year of circulation of the DEIR) focused surveys (protocol-level surveys for species for which there is a protocol) conducted within the APEs.
9. The DEIR should analyze potential habitat fragmentation within the MHPA that would result from the implementation of each alternative, and the impacts of the fragmentation on the MSCP covered and non-covered species.
10. The DEIR should thoroughly analyze the potential impacts from the implementation of each alternative on wildlife corridors/linkages and wildlife movement within each alternative’s APE. For example, the fill and bridge proposed in Rose Canyon for the Regents Road Bridge alternative may be detrimental to local wildlife movement.

- a. The MSCP Subarea Plan states, "If roads cross the MHPA, they should provide fully-functional wildlife movement capability." The DEIR should address this requirement for each alternative, and should describe how the current level of wildlife movement in Rose Canyon and San Clemente Canyon and under Genesee Avenue would be retained or improved. Specifically, (a) for the widening of Genesee Avenue at Rose Canyon, the DEIR should describe how the box culverts under Genesee Avenue, which are already quite long, would be improved for wildlife movement,² and (b) the design for the Regents Road Bridge alternative should span the mainstem of Rose Canyon and the finger canyon between the mainstem and the southern terminus of Regents Road. The discussion of measures to improve the box culverts should include measures to attenuate noise from traffic.
 - b. The cumulative impacts analysis in the DEIR should comprehensively discuss the issue of wildlife movement, and the potential impacts from the implementation of any of the project alternatives in conjunction with past, present, and future projects within the APE.
 - c. The discussion of impacts on wildlife movement should encompass the direct impacts from loss of habitat and the installation of structures and from indirect impacts such as operational noise and lighting. We recommend that the design for the Regents Road Bridge, and the portions of the Genesee Avenue widening alternative that cross over Rose Canyon and San Clemente Canyon: (i) include minimal street lighting; (ii) include measures to prevent spill-over or glare from vehicle lights into the canyons or the night sky; and (iii) include measures to attenuate the noise from traffic.
 - d. If necessary to ascertain the potential impacts on wildlife movement and to assist in determining appropriate measures to avoid or minimize these impacts, the City should conduct a wildlife movement study. The Wildlife Agencies would appreciate the opportunity to review the scope of work developed for any study the City plans to conduct. If no such study is done, the DEIR should demonstrate that the information used for the impact analysis is adequate.
11. The DEIR should identify and discuss potential impacts to mitigation areas for previous projects.
 12. In addition to the loss of sensitive habitat and the wildlife impacts associated with each alternative, the DEIR should also identify and provide a thorough analysis of the following for each alternative: (a) the sensitive habitat that would receive more or less shading than now; (b) the potential direct and indirect hydrological impacts, particularly the long-term impacts on riparian resources from structures placed within the floodplain; and (c) the

² A site visit on March 31, 2004, revealed that, though the box culverts are at least 6 feet high, at this time they have water in them except where sediment has collected. In some areas of sediment accretion, the sediment is so high that it would dissuade wildlife (even small to medium-sized mammals) from passing through. Wildlife probably use the railroad tracks and/or the narrow areas adjacent to and north and south of the tracks, but these do not constitute a viable wildlife linkage between the west and east side of Genesee Avenue.

impacts from maintenance (at any frequency) to maintain the hydraulic capacity of the modified 100-year floodplain.

13. The biological section of the DEIR should include a matrix that summarizes and compares the potential biological impacts from the implementation of each alternative, and other pertinent information.³
14. In addition to the information about the biological impacts of each alternative in the narrative, the biological section in the DEIR should include, at a minimum, the following graphics.
 - a. A separate current aerial photo (scale should be such that it fills a 11 x 17 page) of each of the project areas for (i) alternatives 1 through 3, (ii) the second left turn lane on south bound Genesee Avenue, and (iii) the "improvements at Genesee Avenue/SR 52" if they are different from the second left turn lane. Each photo should have an outline of the project footprint (i.e., not a solid color representing the footprint and obstructing the view of the existing habitat/development within the footprint), including areas that would be only graded (i.e., no structures proposed).
 - b. A separate current aerial photo (scale should be such that it fills a 11 x 17 page) that depicts the locations of the impacts identified in the matrix (requested in the previous comment) for each of alternatives 1 through 3, the second left turn lane on south bound Genesee Avenue, and the "improvements at Genesee Avenue/SR 52" if they are different from the second left turn lane.

Mitigation

15. The DEIR should thoroughly describe measures that would be taken to avoid or minimize the biological impacts identified in the preceding comments in this letter. These measures should be beyond and above the design elements and construction processes incorporated into the project alternatives to avoid or minimize impacts on biological resources. For example, the DEIR should describe measures that would be taken to avoid/minimize indirect hydrological impacts on the morphology, habitat, and natural functions of the riparian systems. The section in the DEIR on mitigation should address, at a minimum, the impacts identified in comments #10 and #13, and management of mitigation areas in perpetuity (e.g., endowment etc.).

³ The matrix should include: acreage of losses of (a) each type of sensitive habitat, (b) sensitive habitat within the MHPA (please distinguish between the MHPA acreage that is already preserved and the acreage that is not, if any), (c) land serving as mitigation for previous project(s), and (d) habitat within restoration project(s); acreage of areas of sensitive habitat that would experience more or less shading than now; sensitive species that may be affected (please identify the species); fragmentation of habitat suitable for sensitive species; relative impacts on wildlife movement, wildlife linkages/corridors; discretionary actions needed [e.g., 404 permit from the U.S. Corps of Engineers, inclusive of section 7 consultation for take of vireo; duration of construction (i.e., # of years); seasonal timing of construction (e.g., during the avian breeding season?); daily timing of construction (e.g., after dark?); operational noise and lighting; direct and indirect hydrological impacts; and impacts from maintenance to maintain the hydraulic capacity.

16. While the City cannot predict the mitigation requirements that the permitting agencies (e.g., U.S. Army Corps of Engineers and Regional Water Quality Control Board) would impose for impacts to jurisdictional habitats, the DEIR should propose mitigation for those impacts that is consistent with the City's biology guidelines, and should thoroughly describe where and how the mitigation would occur, acknowledging that the permitting agencies' requirements may exceed these mitigation requirements. The DEIR should also address whether the proposed wetland mitigation may itself affect wetland habitat. If the proposed mitigation would cause significant biological impacts, the DEIR should analyze these impacts and propose mitigation for them [California Environmental Quality Act (CEQA) Guidelines, section 15126.4(a)(D)].
17. In addition to mitigation already addressed, the DEIR should require the following mitigation measures, at a minimum, for the alternative chosen for implementation, if any.
 - a. Aspects of the project construction that might affect avian breeding behavior should avoid the avian breeding season. If avoiding construction during the breeding season is infeasible, pursuant to Sections 3503, 3503.5 and 3513 of the California Fish and Game Code, (a) all proposed vegetation clearing should occur outside of the avian breeding season (i.e., should occur between September 1 and February 14, January 14 for raptors) in areas that would support avian nests, and (b) where there is suitable nesting habitat for any nongame birds within 300 feet of the project work area (within 500 feet for raptors), measures should be implemented to avoid disturbing avian breeding behavior from indirect effects (e.g., noise, line-of-sight disturbances, night-lighting). The DEIR should describe the measures that would be taken.
 - b. Only non-invasive, preferably native species, should be used for all proposed landscaping (e.g., in medians or shoulders) within, adjacent to, or upstream of either Rose or San Clemente canyons. For native species, local seed (or plantings from local seed) should be used to the extent possible.

Discretionary Actions

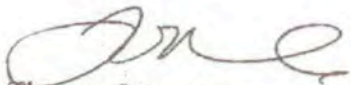
18. The City's incidental take⁴ permit for the MSCP Subarea Plan does not authorize incidental take of federally listed species within U.S. Army Corps of Engineers' jurisdictional wetlands. Therefore, federal take authorization through section 7, provided there is a federal nexus, or section 10 of the Endangered Species Act of 1973, as amended (16 U.S.C. 1531 *et seq*) may be necessary for this project.

⁴ "Take" is defined by the ESA as "harass, harm, pursue, hunt, shoot, wound, trap, capture, or collect or attempt to engage in any such conduct." [ESA §3(18)] "Harass" is further defined by the Service as "actions that create the likelihood of injury to listed species to such an extent as to significantly disrupt normal behavior patterns which include, but are not limited to, breeding, feeding, or sheltering." "Harm" is defined by the Service to include "significant habitat modification or degradation that results in death or injury to listed species by significantly impairing behavioral patterns such as breeding, feeding, or sheltering." [50 CFR §17.3]

19. The alternative the City Council chooses for implementation, if any, may require a Streambed Alteration Agreement (SAA) from the Department. The Department's issuance of a SAA for a project that is subject to the California Environmental Quality Act (CEQA) requires CEQA compliance actions by the Department as a Responsible Agency. As a Responsible Agency under CEQA, the Department may consider the City's CEQA documentation. To minimize additional requirements by the Department pursuant to Section 1600 *et seq.* and/or under CEQA, the documentation should fully identify the potential impacts to the jurisdictional habitats, and provide adequate avoidance, mitigation, monitoring and reporting commitments for issuance of the SAA.

The Wildlife Agencies appreciate the opportunity to comment on this NOP. The Department finds that the project would not be de minimis in its effects on fish and wildlife per section 711.4 of the California Fish and Game Code. We are available to work with the City and their consultants to obtain any necessary permits for the proposed project. Please contact Libby Lucas at (858) 467-4230 or Carolyn Lieberman of the Service at (760) 431-9440, if you have any questions or comments concerning this letter.

Sincerely,



Therese O'Rourke
Assistant Field Supervisor
U.S. Fish and Wildlife Service



For William E. Tippetts
Deputy Regional Manager
California Dept. of Fish and Game

cc: Department of Fish and Game (Kelly Fisher)
State Clearinghouse

From: [Diane Ahern](#)
To: [PLN_PlanningCEQA](#)
Subject: University Community Plan Amendment
Date: Wednesday, December 23, 2015 4:14:31 PM

I am commenting on the EIR for the University Community Plan Amendment.

Please keep in mind:

- all the other transportation projects - both in progress and planned - such as 805, I5 at Genesee, changes on UCSD campus, trolley extension, busses at UTC mall, additional parking structures, etc.

- trolley impact which will include more traffic into north University City as people from the north and east travel to University City to catch the trolley.

- Also changes in school district boundaries is UC Cluster schools. Doyle School on Regents Road in the north is overcrowded and its boundaries have changed so that some children go south to one of the other two grade schools.

- how to keep through traffic off of Genesee; look at how to make Genesee, from Nobel to the 52, for locals only.

-Take care and thank you,

Diane Ahern
4550 Pavlov Ave, SD, 92122, in District One
Sent from my iPhone

From: [Duarte, Dolores@Wildlife](mailto:Duarte.Dolores@Wildlife)
To: [PLN_PlanningCEQA](#)
Cc: [Sevrens, Gail@Wildlife](mailto:Sevrens_Gail@Wildlife); [Fluharty, Marilyn@Wildlife](mailto:Fluharty_Marilyn@Wildlife); state.clearinghouse@opr.ca.gov; [Esguerra, Margarita@Wildlife](mailto:Esguerra_Margarita@Wildlife); [Schlitt, Paul@Wildlife](mailto:Schlitt_Paul@Wildlife); david_zoutendyk@fws.gov
Subject: Copy of comment letter Re: University Community Plan Amendment-SCH 2015121011/Internal Order-Project 120112051-11003327
Date: Thursday, December 31, 2015 1:52:20 PM
Attachments: [image001.jpg](#)
[pdf_University_Community_Plan_Amendment_DEIR.pdf](#)

Ms. Morrison,
Please see attached copy for your records. Original will follow.

If you have any questions, please contact Paul Schlitt at (858) 637-5510.

Thank you!

*Dolores Duarte
Executive Secretary
South Coast Region 5
3883 Ruffin Road
San Diego, CA 92123
(858) 467-2702 - Phone
(858) 467-4239 - Fax*

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State of California – Natural Resources Agency
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EDMUND G. BROWN JR., Governor
CHARLTON H. BONHAM, Director



December 31, 2015

Ms. Susan Morrison, Environmental Planner
City of San Diego Planning Department
1010 Second Avenue, MS-614C
San Diego, California 92101

**Subject: Comments on the Notice of Preparation for the University Community Plan
Amendment Draft Environmental Impact Report
(Project Number 120112051/11003327; SCH No. 2015121011)**

Dear Ms. Morrison:

The California Department of Fish and Wildlife (Department) has reviewed the above-referenced Notice of Preparation (NOP) for the University Community Plan Amendment Draft Environmental Impact Report (DEIR), dated December 2, 2015. The following statements and comments have been prepared pursuant to the Department's authority as Trustee Agency with jurisdiction over natural resources affected by the project (California Environmental Quality Act [CEQA] Guidelines §15386) and pursuant to our authority as a Responsible Agency under CEQA Guidelines section 15381 over those aspects of the proposed project that come under the purview of the California Endangered Species Act (CESA; Fish and Game Code § 2050 et seq.) and Fish and Game Code section 1600 et seq. The Department also administers the Natural Community Conservation Planning (NCCP) program, a California regional habitat conservation planning program. The City of San Diego (City) participates in the NCCP program by implementing its approved Multiple Species Conservation Program (MSCP) Subarea Plan (SAP).

According to the NOP, the DEIR would analyze removing the Genesee Avenue widening and Regents Road Bridge projects from the University Community Plan (UCP) Transportation Element, along with considering six project alternatives. The alternatives are as follows: (1) widening of Genesee Avenue from four to six lanes between State Route 52 and Nobel Drive and constructing Regents Road Bridge (consisting of two separate, parallel two lane bridge structures across Rose Canyon to connect the existing termini of that street at the north and south rims of the canyon); (2) widening of Genesee Avenue and constructing Regents Road Bridge within future implementation of the UCP; (3) widening Genesee Avenue and removing the Regent Road Bridge project from the UCP; (4) constructing Regents Road Bridge and removing the Genesee Avenue widening project from the UCP; (5) constructing a bridge over Rose Canyon for emergency access, transit, pedestrian, and bicycle use only with a Genesee Avenue widening; and (6) constructing a bridge over Rose Canyon for emergency access, transit, pedestrian, and bicycle use only without a Genesee Avenue widening.

Portions of the project area are within the Multiple Habitat Planning Area (MHPA) of the City's MSCP SAP. Specifically, Rose Canyon (Rose Canyon Open Space Park) would be affected by the Regents Road Bridge and Genesee Avenue widening. The extent of the widening of Genesee Avenue could affect a portion of San Clemente Canyon (Marian Bear Memorial Park) depending on modifications to travel lanes (widening described to occur between State Route 52 and Nobel Drive).

The Department along with the U.S. Fish and Wildlife Service previously provided joint comment letters (respectively, April 15, 2004, April 14, 2005, and July 31, 2006) to the City's Development Services Department during the NOP, draft EIR, and final EIR phases for the University City North/South Transportation Corridor Study (SCH#2004031011). The project description provided in the University City North/South Transportation Corridor Study is very similar in scope to the project described in the subject NOP, with a notable difference in the removal of the Genesee Avenue Widening and Regents Road Bridge projects. The Department (and U.S. Fish and Wildlife Service) previously recommended that the City process an amendment to the UPC to remove the Genesee Avenue Widening and Regents Road Bridge from the UPC transportation element. The processing of an amendment to the community plan has since been followed by a City Council resolution (R-2015-142), which included removal of the Genesee Avenue Widening and Regents Road Bridge projects from the UPC.

Based on our review of current project description compared to the project description provided in the University City North/South Transportation Corridor Study project, we believe the majority of the concerns expressed in the prior comment letters remain relevant to this NOP. Therefore, we take this opportunity to reiterate the following comments and recommendations to assist the City in avoiding, minimizing, and adequately mitigating project-related impacts to biological resources.

Project Purpose and Alternatives

1. One of the purposes of CEQA is to "prevent significant, avoidable damage to the environment by requiring changes in projects through the use of alternatives or mitigation measures when the governmental agency finds the changes to be feasible" (CEQA Guideline, §15002 (a)(3); emphasis added). Given the projects potential significant effects on the MHPA and associated sensitive species (e.g., coastal California gnatcatcher) and habitats that could be negatively affected or lost by the proposed project, the CEQA alternatives analysis for this project is extremely important. We are particularly interested in the DEIR describing "a range of reasonable alternatives to the project (particularly options to maximize open space), 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," as required by Section 15126.6(a) of the CEQA Guideline. The alternatives are to include "alternatives [that] would impede to some degree the attainment of the project objectives, or would be more costly" (§15126.6(b) of the CEQA Guidelines). "The range of feasible alternatives shall be selected and discussed in a manner to foster meaningful public participation and informed decision making" (§15126.6(f) of the CEQA Guidelines). The Department will consider the alternatives analyzed in the context of their relative impacts on biological resources on both a local and regional level.

Additionally, each alternative should be evaluated for consistency with the respective design criteria, resource management and environmental elements or goals associated with the applicable land use plan, policy, or regulation affected by this project. Specific plans to consider include the Strategic Framework Element (City of Villages), University Community Plan, and Marine Corps Air Station Miramar Integrated Natural Resources Management Plan (INRMP, 2011-2015). According to the Strategic Framework Element,

the City and region have made significant strides with respect to open space preservation, however citing that "...development of sensitive lands, where it is permitted, continues to be marred by poor design and insensitive grading techniques that have resulted in the destruction of ridgelines and other environmental impacts. Finally, open space linkages between communities and the integration of open space, scenic resources, and active recreation in neighborhoods rarely occur". We are interested in how the project alternatives would avoid or minimize the aforementioned concerns.

2. The DEIR should provide a very clear and detailed description of the purpose, goals, and objectives for the project, as this will be critical in determining the most appropriate alternative to address the specific traffic needs and reduce biological impacts to a level less than significant. We recommend that the transportation/circulation analysis include a table summarizing the positive and negative effects on traffic within the alternatives' respective areas of potential effect.
3. The DEIR must ensure and verify that the implementation of any of the alternatives would meet all the requirements and conditions of the City's MSCP SAP and Implementing Agreement (IA). The DEIR should also address biological issues that are not addressed in the MSCP SAP and IA, such as specific impacts to and mitigation for wetlands or sensitive species and habitats that are not covered by the SAP and IA. For example, the DEIR should address whether any potential take of MSCP-covered species (e.g., coastal California gnatcatcher [*Polioptila californica californica*, gnatcatcher] and the least Bell's vireo [*Vireo bellii pusillus*, vireo]) would be in conformance with the MSCP.

Impact Analysis

4. The DEIR should accurately disclose the relationship of this project to the City's MSCP and the general planning policies and design guidelines (i.e., manner consistent with Section 1.4.2 of the City's SAP) that are required to be considered and to adhere to minimizing impacts to the maximum extent practicable. Rose and San Clemente Canyons are considered a core area of the MSCP (core areas being defined in the MSCP as "generally supporting a high concentration of sensitive biological resources which, if lost, could not be replaced or mitigated elsewhere"). The direct, indirect and cumulative impact analysis should include figures of the designated preserve areas that exist within and adjacent to the project boundaries along with discussion on the current status and long-term management obligations associated with these areas and any potential impacts to these areas that may result from the proposed project.
5. The Regents Road Bridge alternative would affect an area of habitat (e.g., coastal sage scrub, wetland) restoration in Rose Canyon between the main stem of Rose Creek and the southern terminus of Regents Road. This area is within the Multiple Habitat Planning Area (MHPA) of the City's MSCP SAP. Furthermore, the City committed to preserving the restoration area in perpetuity by accepting funding in 1998 from the California Department of Parks and Recreation (DPR) Habitat Conservation Fund Program (HCFP) to conduct the restoration. The DPR's procedural guide for the HCFP (May 1997), states, "applicant will maintain and operate the property acquired, developed, rehabilitated, or restored with the funds in perpetuity..... [and] make no other use, sale, or other disposition of the property except as authorized by specific act of the Legislature." The City's October 1997 application to the DPR HCFP for funding this restoration, states, "all projects are within the protected

boundaries of Rose Canyon Open Space Park," in response to a query about whether adjacent land use is permanent and compatible or adequate buffer zones would be established. The DEIR should briefly discuss the purpose of the restoration, and identify the City's commitments to the agency(ies) that awarded the City funding. If the City committed to preserving the restoration in perpetuity, and the Regents Road Bridge alternative could not be designed to avoid (including shading and indirect impacts) the restoration area, the DEIR should explain why the Regents Road Bridge is among the alternatives being studied. Additionally, two other mitigation sites (associated with the City's Canyon Sewer Cleaning Program and Long-Term Sewer Maintenance Program) occur to the east and west of the Regents Road Bridge proposal. The DEIR should evaluate the potential effects of the project alternatives on these mitigation areas.

6. For each alternative's area of potential effect (APE), the DEIR should identify the CESA- and federal Endangered Species Act (ESA)-listed species, California Species of Special Concern, and all other sensitive species for which the habitat within the APE is suitable (species addressed should include all those which meet the CEQA definition (see CEQA Guidelines, §15380). Additionally, the DEIR should identify species observed during current (i.e., within a year of circulation of the DEIR) focused surveys conducted within the APEs. Seasonal variations in use of the project area should also be addressed. Focused species-specific surveys, conducted at the appropriate time of year and time of day when the sensitive species are active or otherwise identifiable, are required. Acceptable species-specific survey procedures should be developed in consultation with the Department and the U.S. Fish and Wildlife Service.
7. The DEIR should analyze potential habitat fragmentation within the MHPA that would result from the implementation of each alternative, and the impacts of the fragmentation on the MSCP covered and non-covered species.
8. The DEIR should thoroughly analyze the potential impacts from the implementation of each alternative on wildlife corridors/linkages and wildlife movement within each alternative's APE.
 - a. The MSCP SAP states, "If roads cross the MHPA, they should provide fully-functional wildlife movement capability." The DEIR should address this requirement for each alternative, and should describe how the current level of wildlife movement in Rose Canyon and San Clemente Canyon and under Genesee Avenue would be retained or improved. Specifically, (a) for the widening of Genesee Avenue at Rose Canyon, the DEIR should describe how any existing box culverts under Genesee Avenue would be improved for wildlife movement and, (b) the design for the Regents Road Bridge alternative should span the main stem of Rose Canyon and the finger canyon between the main stem and the southern terminus of Regents Road. The discussion of measures to improve any existing box culverts should include measures to attenuate noise from traffic.
 - b. The cumulative impacts analysis in the DEIR should comprehensively discuss the issue of wildlife movement (e.g., mountain lion [*Puma concolor*], bobcat ([*Felis rufus*], and mule deer [*Odocoileus hemionus fuliginita*]), and the potential impacts from the implementation of any of the project alternatives in conjunction with past, present, and future projects within the APE.

- c. The discussion of impacts on wildlife movement should encompass the direct impacts from loss of habitat and the installation of structures and from indirect impacts such as operational noise (e.g., noise impacts can extend at least 500-feet and up to 1,000 feet from the edge of the Regents Road bridge) and lighting. We recommend that the design for the Regents Road Bridge and the portions of the Genesee Avenue widening alternative that cross over Rose Canyon and San Clemente Canyon: (i) include minimal street lighting; (ii) include measures to prevent spill-over or glare from vehicle lights into the canyons or the night sky; and (iii) include measures to attenuate the noise from traffic.
 - d. If necessary to ascertain the potential impacts on wildlife movement and to assist in determining appropriate measures to avoid or minimize these impacts, the City should conduct a wildlife movement study. The Department would appreciate the opportunity to review the scope of work developed for any study the City plans to conduct. If no such study is done, the DEIR should demonstrate that the information used for the impact analysis is adequate.
9. In addition to the loss of sensitive habitat and the wildlife impacts associated with each alternative, the DEIR should also identify and provide a thorough analysis of the following for each alternative: (a) the sensitive habitat that would receive more or less shading than now; (b) project-related changes on drainage patterns on and downstream of the project site; the volume, velocity, and frequency of existing and post-project surface flows; polluted runoff; soil erosion and/or sedimentation in streams and water bodies; and post-project fate of runoff from the project site; (c) proximity of the extraction activities to the water table, whether dewatering would be necessary, and the potential resulting impacts on the habitat, if any, supported by the groundwater; and (d) the impacts from maintenance (at any frequency) to maintain the hydraulic capacity of the modified 100-year floodplain.
 10. The biological section of the DEIR should include a matrix that summarizes and compares the potential biological impacts from the implementation of each alternative, and other pertinent information.

Mitigation for the Project-related Biological Impacts

11. Mitigation measures should emphasize avoidance and reduction of project impacts. These measures should be beyond and above the design elements and construction processes incorporated into the project alternatives to avoid or minimize impacts on biological resources. For unavoidable impacts, on-site habitat restoration or enhancement should be discussed in detail. If on-site mitigation is not feasible or would not be biologically viable and therefore not adequate to mitigate the loss of biological functions and values, off-site mitigation through habitat creation and/or acquisition and preservation in perpetuity should be addressed.
12. For proposed preservation and/or restoration of habitat, the DEIR should include measures to perpetually protect the targeted habitat values from direct and indirect negative impacts. The objective should be to offset the project-induced qualitative and quantitative losses of wildlife habitat values. Issues that should be addressed include restrictions on access, proposed land dedications, monitoring and management programs, control of illegal dumping, water pollution, increased human intrusion, and so forth.

13. While the City cannot predict the mitigation requirements that the permitting agencies (e.g., U.S. Army Corps of Engineers and Regional Water Quality Control Board) would impose for impacts to jurisdictional habitats, the DEIR should propose mitigation for those impacts that is consistent with the City's Biology Guidelines, and should thoroughly describe where and how the mitigation would occur, acknowledging that the permitting agencies' requirements may exceed these mitigation requirements. The DEIR should also address whether the proposed wetland mitigation may itself affect wetland habitat. If the proposed mitigation would cause significant biological impacts, the DEIR should analyze these impacts and propose mitigation for them (CEQA Guidelines, section 15126.4(a)(1)(D)).
14. The Department recommends that measures be taken to avoid project impacts to nesting birds. Migratory nongame native bird species are protected by international treaty under the Federal Migratory Bird Treaty Act (MBTA) of 1918 (Title 50, § 10.13, Code of Federal Regulations). Sections 3503, 3503.5, and 3513 of the California Fish and Game Code prohibit take of all birds and their active nests including raptors and other migratory nongame birds (as listed under the Federal MBTA). Proposed project activities (including, but not limited to, staging and disturbances to native and nonnative vegetation, structures, and substrates) should occur outside of the avian breeding season which generally runs from February 1- September 1 (as early as January 1 for some raptors) to avoid take of birds or their eggs. If avoidance of the avian breeding season is not feasible, the Department recommends surveys by a qualified biologist with experience in conducting breeding bird surveys to detect protected native birds occurring in suitable nesting habitat that is to be disturbed and (as access to adjacent areas allows) any other such habitat within 300 feet of the disturbance area (within 500 feet for raptors). Project personnel, including all contractors working on site, should be instructed on the sensitivity of the area. Reductions in the nest buffer distance may be appropriate depending on the avian species involved, ambient levels of human activity, screening vegetation, or possibly other factors.
15. Only non-invasive, preferably native species, should be used for all proposed landscaping (e.g., in medians or shoulders) within, adjacent to, or upstream of either Rose or San Clemente Canyons. For native species, local seed (or plantings from local seed) should be used to the extent possible.
16. Plans for restoration and revegetation should be prepared by persons with expertise in southern California ecosystems and native plant revegetation techniques. Each plan should include, at a minimum: (a) the location of the mitigation site; (b) the plant species to be used, container sizes, and seeding rates; (c) a schematic depicting the mitigation area; (d) planting schedule; (e) a description of the irrigation methodology; (f) measures to control exotic vegetation on site; (g) specific success criteria; (h) a detailed monitoring program; (i) contingency measures should the success criteria not be met; and (j) identification of the party responsible for meeting the success criteria and providing for conservation of the mitigation site in perpetuity.

Discretionary Actions

17. The City's incidental take permit for the MSCP SAP does not authorize incidental take of ESA-listed species within U.S. Army Corps of Engineers' jurisdictional wetlands. Therefore,

federal take authorization through section 7, provided there is a federal nexus, or section 10 of the Endangered Species Act of 1973, as amended (16 U.S.C. 1531 et seq) may be necessary for this project.

18. The Department has regulatory authority over activities in streams and/or lakes that will divert or obstruct the natural flow, or change the bed, channel, or bank (which may include associated riparian resources) of any river or stream, or lake or use material from a river, stream, or lake. For any such activities, the project applicant (or "entity") must provide written notification to the Department pursuant to section 1600 et seq. of the Fish and Game Code. Based on this notification and other information, the Department then determines whether a Lake and Streambed Alteration (LSA) Agreement is required. The Department's issuance of a LSA for a project that is subject to CEQA will require CEQA compliance actions by the Department as a Responsible Agency. As a Responsible Agency under CEQA, the Department may consider the lead agency's CEQA documentation for the project. To minimize additional requirements by the Department pursuant to section 1600 et seq. and/or under CEQA, the document should fully identify the potential impacts to the stream or riparian resources and provide adequate avoidance, mitigation, monitoring, and reporting commitments for issuance of an SAA.¹

We appreciate the opportunity to comment on this NOP. Questions regarding this letter and further coordination on these issues should be directed to Paul Schlitt at (858) 637-5510 or paul.schlitt@wildlife.ca.gov.

Sincerely,



Gail K. Sevens
Environmental Program Manager
South Coast Region

ec: Scott Morgan (State Clearinghouse)
David Zoutendyk, U.S. Fish and Wildlife Service, Carlsbad Office

¹ A notification package for a SAA may be obtained by accessing the Department's web site at www.wildlife.ca.gov/habcon/1600.

From: [ereiger](#)
To: [PLN_PlanningCEQA](#)
Subject: University Community Plan Amendment
Date: Sunday, December 13, 2015 10:02:58 PM

I whole heartedly endorse removing the Regents Road bridge, from the plan.

Once that is done then I think you should revisit the number of trips on Genesee and try to route traffic off streets that cut through neighborhoods and onto freeways.

Thank You,

Ed and Barbara Reiger
3031 Renault Street
San Diego , Ca 92122



CITY OF SAN DIEGO

PLANNING DEPARTMENT ENVIRONMENTAL ANALYSIS PUBLIC SCOPING MEETING

University Community Plan Amendment / DECEMBER 16, 2015

12/24/15

This meeting is being held pursuant to the *California Public Resources Code Section 21083.9 et seq.*, and is provided to give the public and interested parties an opportunity to submit comments regarding the potential environmental impacts of the proposed project. This information will be used to develop the scope and content of the proposed Environmental Impact Report (EIR) for the project to be described at this meeting. Please record your comments in the space provided below and submit this form to City staff at the conclusion of the meeting or you can mail to the address noted on the back of this form. Thank You.

Comments: REGARDLESS OF THE EIR OUTCOME
I WANT TO GO ON THE RECORD AS BEING AGAINST
THE REGENTS ROAD BRIDGE AS WELL AS THE
WIDENING OF GENESEE. DOING EITHER OR
BOTH WOULD ENCOURAGE MORE FREEWAY
TRAFFIC TO DIVERT ONTO SURFACE STREETS.
AS FAR AS EMERGENCY RESPONSE IS
CONCERNED THE TWO NEW FIRE STATIONS,
ONE IN N-UC + ONE IN S-UC WILL BE
SUFFICIENT FOR FIRE PROTECTION. FOR
AMBULANCE SERVICE, CALL VOLUME + RESPONSE
TIME MIGHT DICTATE AN ADDITIONAL AMBULANCE
IN SOUTH UC.

Name EDWARD REIGER Signature Edward Reiger
Address 3031 RENAULT ST SAN DIEGO CA 92122

Use back of sheet if additional space is necessary.

From: [Eileen McKoy](#)
To: [PLN PlanningCEQA](#)
Subject: University Community Plan Amendment Schedule No.: Pending (Internal Order 12002051/11003327)
Date: Sunday, December 06, 2015 10:56:41 AM

To: Susan Morrison
Environmental Planner
City of San Diego Planning Department

Dear Ms. Morrison:

We note that the scoping meeting is to take place in December. This is unacceptable. This is a holiday period when concerned citizens have limited time for participation. It seems obvious that this discussion is being rushed through because Councilwoman Lightner hopes voters will have forgotten her stance against the Regents Street Bridge by the 2016 election. She may rest assured this is not the case.

The University City community is very stressed by traffic. This would have been greatly mitigated by the building of the bridge years ago. The citizens will be very much aggrieved, once again, at the city hall planners and politicians if this meeting and the removal of the bridge from the community plan are pushed through without the full participation of those affected.

Yours sincerely
Eileen and Tony McKoy
University City Residents



Friends of Rose Creek *

"Connecting Our Communities"

4629 Cass Street #188
San Diego CA 92109



January 2, 2016

Via email transmission

Susan Morrison, Environmental Planner
City of San Diego Planning Department
1010 Second Avenue, MS 614C
San Diego, CA 92101
PlanningCEQA@sandiego.gov

RE: Notice of Preparation of an Environmental Impact Report
for the University Community Plan Amendment

Dear Ms. Morrison:

Thank you for the opportunity to comment on the preparation of the Environment Impact Report for the University City Community Plan Amendment. As a partner in the Rose Creek Watershed, The Friends of Rose Creek are always concerned about potential positive and negative impacts to the entire watershed and especially to the lower portion of the watershed.

Rose Creek is listed as a 303(d) impaired waterway by the State of California. In addition to the creek being listed, the Rose Creek Estuary at Mission Bay is also listed as a 303(3) impaired waterway. Furthermore, sections of the lower portion of Rose Creek are designated as MHPA by the City including fresh water riparian areas and the Salt Marsh and Estuarine zones. Therefore we would like to request that the Environmental Impact Report study the potential positive impacts to all downstream portions of the watershed with the no build alternative as well as negative impacts that may be caused by any of the build alternatives.

The lower portion of Rose Creek is part of a number of comprehensive planning efforts including the Mid-Coast Trolley (<http://www.sandag.org/index.asp?projectid=250&fuseaction=projects.detail>), De Anza Revitalization Plan (http://saverosecreek.org/news/?page_id=1340), the ReWild Mission Bay Project (<http://rewildmissionbay.org/>), the Rose Creek Bikeway Project (http://www.keepsandiegomoving.com/RegionalBikeProjects/coastal_rail_trail_docs.aspx), and the Balboa

**A member of the Rose Creek Watershed Alliance*

** A Friends Group of San Diego Canyonlands, Inc.*

Visit us on-line at <http://www.saverosecreek.org>

Avenue Trolley Station Planning Area (http://saverosecreek.org/news/?page_id=1349). Furthermore, water quality in Rose Creek has a direct impact on Mission Bay Park – the largest aquatic recreational area in the United States. We are especially concerned about the cumulative impacts of all these projects in maintaining water quality and habitat for native plants and animals.

Specifically, we ask that the City of San Diego study the cumulative impacts of all these projects in conjunction with the proposed alternatives and identify both potential positive and negative biological, water quality, visual and noise impacts to wild animals, birds, insects and children, who use the park as a respite from living in a largely urban area. Furthermore, as this EIR is studying transportation alternatives, I would urge you to take into account the proposed safe and legal bicycle crossing at I-5/Highway 52 in terms of alternative bicycle traffic (See http://scc.ca.gov/webmaster/ftp/pdf/sccbb/2010/1005/20100527Board17_Rose_Creek_Trail.pdf) and the potential transportation options to be opened up via this project. I believe you already intend to study the Mid-Coast Trolley as a potential transit alternative to private vehicles. In addition, creating safe and legal railroad crossings for pedestrians and bicyclists in Rose Canyon will allow more individuals to enjoy the canyon while heading to their destination and this alternative should be included as encouraging human powered transportation is a key component of the City of San Diego's Climate Action Plan. Removing barriers to human powered transit between North and South University City as well as between South University City and the excellent bicycle corridor to the west is a key strategy to encouraging healthy transit options.

The Rose Creek Watershed Opportunities Assessment (See <http://www.rosecreekwatershed.org/projects/>) outlines a number of potential enhancements in the area and was accepted by City Council in 2008. I strongly urge you to incorporate findings from this study into the draft EIR. Finally, I would request that the draft EIR include all impacts that result in direct or indirect physical changes in the environment, not only in the immediate areas of the proposed alternatives, but within the watershed as a whole.

Respectfully,


Karin Zirk, Ph.D.

**A member of the Rose Creek Watershed Alliance*

**A Friends Group of San Diego Canyonlands, Inc.*

Visit us on-line at <http://www.saverosecreek.org>

From: [GLENDA STANGEL](#)
To: [PLN_PlanningCEQA](#)
Subject: Environmental impacts of Regents bridge and Gilman extension
Date: Sunday, December 20, 2015 4:58:09 PM
Attachments: [datauri-file.png](#)

Inline image



Comments:

We have lived here in University City for 46 years and the need for the **Regents Rd. bridge** and the **Governor to Gilman extension** have only increased.

For a city that claims to want clean energy to decrease pollution, small fixes like the bridge and the extension that would GREATLY diminish the AIR pollution from Genesee Ave. gridlock, experienced DAILEY, morning and evening, would seem like a no-brainer.

Not only would the thousands of pounds of pollution be diminished, but **safety** for the community would be enhanced, with easier access for fire, medical and police equipment.

Our son was hit by a vehicle 44 years ago, on Governor Drive, by Curie Elementary School. We are EXTREEMLY eager to diminish traffic on Genesee Ave. to possibly save other parents the anguish we experienced.

Thank you for your consideration.

Sincerely,

Glenn and Glenda Stangel

4725 Pauling Ave.

San Diego, CA 92122

From: [GLENDA STANGEL](#)
To: [PLN_PlanningCEQA](#)
Subject: University Community Plan Amendment
Date: Friday, December 18, 2015 8:55:41 PM

The bridge on Regents Rd. , to connect the two ends needs desperately to be built.
Grid locked traffic on Genessee Ave. causes untold pollution **daily**.
We have lived here in University City for 46 years and this problem only increases.
Opening Regents to through traffic would relieve Genessee from some of the pressure
and the attending pollution.

.
Sincerely,
Glenn and Glenda Stangel
725 Pauling Ave.
San Diego, CA 92122

Susan Morrison, Environmental Planner
City of San Diego Planning Department
1010 Second Avenue, MS 614C
San Diego, CA 92101
Dated December 14, 2015

Via email and Standard Mail Delivery

Re: University Community Plan Amendment & EIR Scoping Document; No. 12002051/11003327

Dear Ms. Morrison

I was born and raised in University City and have witnessed firsthand the continued growth which extends far above the original plan for the area. I recently became aware of the NOP for the above-referenced project, which was dated December 2, 2015 after attending a recent UCPG Meeting.

This document calls for a comment period of 30 days which ends on Friday, January 1, 2016. There is also an EIR Scoping meeting scheduled for December 16, 2015. The timing of these items are very troubling. For many people, December is the month in which people are traveling for the holidays, attending children's programs at school, wrapping up end of the year projects at work and are under a lot of stress.

There are two additional factors which I believe are imperative to address. First is the release of the results of the most recent traffic study (which should have occurred prior to the NOP). Second is the San Diego School Board of Educations' recent redistricting of Doyle and Curie elementary schools. These factors are necessary to determine the potential impact of the elimination of the Regents Road Bridge project from the Community Plan. To develop a plan without a thorough understanding or acknowledgement of these factors is imprudent and borders on negligence

I am also aware of the Gregory Barnes letter you received protesting the timing of the NOP for the EIR and the Scoping meeting and stand behind his comments wholeheartedly. Please consider this letter as a formal protest against the timing of the NOP and Scoping Meeting.

Sincerely,

Glenn Martin
gmnu1@hotmail.com

Formal request

This is a formal request for information to be added to the University Community Plan Amendment & EIR Scoping Document; Internal No. 12002051/11003327.

This Environmental Impact Report should contain a listing of the entire current amount of permitted development in University City by asset type. To clarify, the entire amount of commercial, retail, medical, industrial, hospital and residential space currently developed along with the daily trips generated by each use calculated as currently outlined in the City of San Diego's "Trip Generation Manual". This would demonstrate the current volume of employees, staff, building visitors as well as residents in the area. To develop a plan without a thorough understanding or acknowledgement of these factors is improper.

Sincerely,

A handwritten signature in blue ink, appearing to read "Glenn Martin", with a long horizontal flourish extending to the right.

Glenn Martin

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Additionally, codify within the document the trips and riders of the SuperLoop (99 % of which are UCSD students) as well as the anticipated users of the new trolley line. In a recent UCPG a representative of the MTS stated that the estimated peak usage of riders was in the range of 1,700 riders per day.

Sincerely,



Glenn Martin

From: [Glenn Martin](#)
To: [PLN PlanningCEQA](#)
Subject: Recommended Change to the Comment Period for University City EIR & Scoping Document
Date: Tuesday, December 15, 2015 6:55:55 AM
Attachments: [Susan Morrison letter 121415.pdf](#)

Dear Ms. Morrison,

Please see the attached letter and inserted text regarding the Recommended Change to the Comment Period for University City EIR & Scoping Document.

Susan Morrison, Environmental Planner
City of San Diego Planning Department
1010 Second Avenue, MS 614C
San Diego, CA 92101
Dated December 14, 2015
Delivery

Via email and Standard Mail

Re: University Community Plan Amendment & EIR Scoping Document; No. 12002051/11003327

I was born and raised in University City and have witnessed firsthand the continued growth which extends far above the original plan for the area. I recently became aware of the NOP for the above-referenced project, which was dated December 2, 2015 after attending a recent UCPG Meeting. This document calls for a comment period of 30 days which ends on Friday, January 1, 2016. There is also an EIR Scoping meeting scheduled for December 16, 2015. The timing of these items are very troubling. For many people, December is the month in which people are traveling for the holidays, attending children's programs at school, wrapping up end of the year projects at work and are under a lot of stress.

There are two additional factors which I believe are imperative to address. First is the release of the results of the most recent traffic study (which should have occurred prior to the NOP). Second is the San Diego School Board of Educations' recent redistricting of Doyle and Curie elementary schools. These factors are necessary to determine the potential impact of the elimination of the Regents Road Bridge project from the Community Plan. To develop a plan without a thorough understanding or acknowledgement of these factors is imprudent and borders on negligence

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Please consider this letter as a formal protest against the timing of the NOP and Scoping Meeting.

Sincerely,

Glenn Martin

gmnuc1@hotmail.com

Susan Morrison, Environmental Planner
City of San Diego Planning Department
1010 Second Avenue, MS 614C
San Diego, CA 92101
Dated December 14, 2015

Via email and Standard Mail Delivery

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Dear Ms. Morrison

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This document calls for a comment period of 30 days which ends on Friday, January 1, 2016. There is also an EIR Scoping meeting scheduled for December 16, 2015. The timing of these items are very troubling. For many people, December is the month in which people are traveling for the holidays, attending children's programs at school, wrapping up end of the year projects at work and are under a lot of stress.

There are two additional factors which I believe are imperative to address. First is the release of the results of the most recent traffic study (which should have occurred prior to the NOP). Second is the San Diego School Board of Educations' recent redistricting of Doyle and Curie elementary schools. These factors are necessary to determine the potential impact of the elimination of the Regents Road Bridge project from the Community Plan. To develop a plan without a thorough understanding or acknowledgement of these factors is imprudent and borders on negligence

I am also aware of the Gregory Barnes letter you received protesting the timing of the NOP for the EIR and the Scoping meeting and stand behind his comments wholeheartedly. Please consider this letter as a formal protest against the timing of the NOP and Scoping Meeting.

Sincerely,

Glenn Martin
gmnuc1@hotmail.com

From: [Glenn Martin](#)
To: [PLN PlanningCEQA](#)
Subject: EIR Scoping Doc Number 12002051/11003327
Date: Wednesday, December 16, 2015 2:31:56 PM
Attachments: [Request of information for EIR 121615.pdf](#)
[ATT00001.htm](#)

Please see the attached formal request for additional information.

Sincerely,

Glenn Martin

Formal request

This is a formal request for information to be added to the University Community Plan Amendment & EIR Scoping Document; Internal No. 12002051/11003327.

This Environmental Impact Report should contain a listing of the entire current amount of permitted development in University City by asset type. To clarify, the entire amount of commercial, retail, medical, industrial, hospital and residential space currently developed along with the daily trips generated by each use calculated as currently outlined in the City of San Diego's "Trip Generation Manual". This would demonstrate the current volume of employees, staff, building visitors as well as residents in the area. To develop a plan without a thorough understanding or acknowledgement of these factors is improper.

Sincerely,

A handwritten signature in blue ink, appearing to read "Glenn Martin", with a long horizontal flourish extending to the right.

Glenn Martin

From: [Glenn Martin](#)
To: [Morrison, Susan](#)
Cc: [Schoenfisch, Brian](#); [Murphy, Jeff](#); [Blake, Martha](#); [Bragado, Nancy](#); [Herrmann, Myra](#); [Garcia, Melissa](#); [Monroe, Daniel](#)
Subject: Re: University City Community Plan Amendment Scoping Period
Date: Thursday, December 17, 2015 7:03:50 AM

Formal request

This is a formal request for information to be added to the University Community Plan Amendment & EIR Scoping Document; Internal No. 12002051/11003327.

This Environmental Impact Report should contain a listing of the entire current amount of permitted development in University City by asset type. To clarify, the entire amount of commercial, retail, medical, industrial, hospital and residential space currently developed along with the daily trips generated by each use calculated as currently outlined in the City of San Diego's "Trip Generation Manual". This would demonstrate the current volume of employees, staff, building visitors as well as residents in the area. To develop a plan without a thorough understanding or acknowledgement of these factors is improper.

Additionally, codify within the document the number of trips and riders of the SuperLoop (99 % of which are UCSD students) as well as the anticipated users of the new trolley line. In a recent UCPG meeting a representative of the MTS stated that the estimated peak usage of riders was in the range of 1,700 riders per day.

Sincerely,

Glenn Martin

From: Morrison, Susan <SIMorrison@sandiego.gov>
Sent: Tuesday, December 15, 2015 1:26 PM
To: Morrison, Susan

Cc: Schoenfisch, Brian; Murphy, Jeff; Blake, Martha; Bragado, Nancy; Herrmann, Myra; Garcia, Melissa; Monroe, Daniel

Subject: University City Community Plan Amendment Scoping Period

Good Afternoon:

Thank you for your comments regarding the Environmental Impact Report (EIR) to be prepared for the University Community Plan Amendment. The Notice of Preparation (NOP) you received and scoping meeting are just the beginning of the public input process for this environmental review document. There will be other opportunities for you to become involved throughout the project.

The scoping meeting to be held on December 16, 2015 is designed to get as much public input as possible on areas that need to be addressed in the EIR. This meeting will focus on environmental impacts the public would like thoroughly analyzed in the project's environmental document, rather than discuss the merits of the project, debate the various alternatives, or answer questions. We will simply be noting and recording comments on potential environmental impacts to the community as a result of the project.

While the NOP states a 30-day deadline for the receipt of comments, we will continue to accept any comments from the public throughout the EIR process. In addition, there will be additional opportunities to provide comment on the project, such as during public review of the draft environmental document and any public hearings. We will keep your name on our contact list so that we may contact you and continue to provide you with notices.

Thank you for your interest in this project.

Susan I. Morrison, AICP

Associate Planner

City of San Diego, Planning Department - Environmental

1010 2nd Avenue, MS 614C

San Diego, CA 92101

(619) 533-6492

SI Morrison@sandiego.gov

From: [Glenn Martin](#)
To: [PLN PlanningCEQA](#)
Subject: Recommended Change to the Comment Period for University City EIR & Scoping Document
Date: Tuesday, December 15, 2015 1:14:40 PM
Attachments: [Susan Morrison letter 121415.pdf](#)
Importance: High

Dear Ms. Morrison,

Please see the attached letter and inserted text regarding the Recommended Change to the Comment Period for University City EIR & Scoping Document.

Susan Morrison, Environmental Planner
City of San Diego Planning Department
1010 Second Avenue, MS 614C
San Diego, CA 92101
Dated December 14, 2015
Delivery

Via email and Standard Mail

Re: University Community Plan Amendment & EIR Scoping Document; No. 12002051/11003327

I was born and raised in University City and have witnessed firsthand the continued growth which extends far above the original plan for the area. I recently became aware of the NOP for the above-referenced project, which was dated December 2, 2015 after attending a recent UCPG Meeting. This document calls for a comment period of 30 days which ends on Friday, January 1, 2016. There is also an EIR Scoping meeting scheduled for December 16, 2015. The timing of these items are very troubling. For many people, December is the month in which people are traveling for the holidays, attending children's programs at school, wrapping up end of the year projects at work and are under a lot of stress.

There are two additional factors which I believe are imperative to address. First is the release of the results of the most recent traffic study (which should have occurred prior to the NOP). Second is the San Diego School Board of Educations' recent redistricting of Doyle and Curie elementary schools. These factors are necessary to determine the potential impact of the elimination of the Regents Road Bridge project from the Community Plan. To develop a plan without a thorough understanding or acknowledgement of these factors is imprudent and borders on negligence

I am also aware of the Gregory Barnes letter you received protesting the timing of the NOP for the

EIR and the Scoping meeting and stand behind his comments wholeheartedly.
Please consider this letter as a formal protest against the timing of the NOP and Scoping Meeting.

Sincerely,

Glenn Martin

gmnuc1@hotmail.com

7165 Calabria Court, Unit D
San Diego, CA 92122
January 1, 2016

VIA FIRST CLASS MAIL and EMAIL TO Planningceqa@sandiego.gov

Susan Morrison, Environmental Planner
City of San Diego Planning Department
1010 Second Avenue, MS 614C
San Diego, CA 92101

Re: PROJECT NAME: University Community Plan Amendment
SCH NO.: Pending
INTERNAL ORDER No. 12002051/11003327

Dear Ms. Morrison:

I am writing to you with my written comments regarding the scope and alternatives of the proposed EIR. I wrote to you previously on December 12, 2015 concerning my objections to the timing of the NOP and the Scoping Meeting. In that letter I requested that the NOP, the comment period thereunder, and the EIR Scoping Meeting be postponed as originally dated, and moved out of the Holiday season to sometime in January or February, 2016 so that a more reasonable time frame may be available for all of the communities and organizations affected by the process to fully participate.

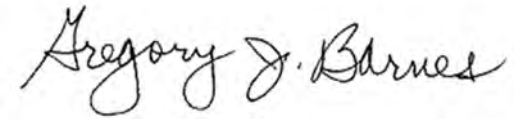
My comments, as best as can be put together during this hectic Holiday season, are as follows:

1. ***EIR Requirements*** – A. INTRODUCTION: The Introduction should specifically point out that the intended use and purpose of the EIR is to eliminate and remove the Regents Road Bridge project and the Genesee Avenue widening project from the University Community Plan (UCP) Transportation Element, and that all five (5) project alternatives would also eliminate the Regents Road Bridge Project and the Genesee Avenue widening project.
2. ***EIR Requirements*** – B. ENVIRONMENTAL SETTINGS: This section should discuss the history of Rose Canyon, including its zoning and land use history, as well as the history of the commerce conducted in Rose Canyon over the history of Rose Canyon.
3. ***EIR Requirements*** – D. HISTORY OF PROJECT CHANGES: This section should provide a **detailed** history of the approval of the Regents Road Bridge as the preferred transportation element of the UCP Transportation Element, as well as the approval of Resolutions R-301787 and R-303141 by the San Diego City Council.
4. ***EIR Requirements*** – E. ENVIRONMENTAL ISSUES: This section should also include the current development being constructed in the Community, as well as the planned future development plans in the Community. This should include any future development plans announced as of the date of the Draft EIR.

Page 2
1/1/2016

Please incorporate the above requested comment items into the scoping of the Draft EIR.

Sincerely,

A handwritten signature in black ink that reads "Gregory J. Barnes". The signature is written in a cursive, flowing style.

Gregory J. Barnes

7165 Calabria Court, Unit D
San Diego, CA 92122
December 12, 2015

VIA EMAIL ONLY TO Planningceqa@sandiego.gov

Susan Morrison, Environmental Planner
City of San Diego Planning Department
1010 Second Avenue, MS 614C
San Diego, CA 92101

Re: PROJECT NAME: University Community Plan Amendment
SCH NO.: Pending
INTERNAL ORDER No. 12002051/11003327

Dear Ms. Morrison:

I am a resident of the University City neighborhood of the City of San Diego. I recently received a copy of the NOP for the above-referenced project, which NOP was dated December 2, 2015. The NOP calls for a comment period of 30 days to Friday, January 1, 2016 (which would go to January 2, 2016 as the 1st is a Legal Holiday). The NOP also notified me that an EIR Scoping Meeting would take place on December 16, 2015.

I am writing to you to formally object to the timing of the NOP, the timing of the EIR Scoping Meeting, and the timing of the 30 day comment period. The reasons for my objection are as follows:

1. This is the Holiday season. I, for one, and many others that I know who are interested in this matter, are in the middle of Holiday events, Holiday travel, shopping, entertaining Holiday guests, and a whole host of other activities. This is the worst time of the year for anyone to concentrate upon, or pay attention to, a matter of this severe magnitude for the University City and surrounding neighborhoods. The Regents Road Bridge issue, or the potential elimination of the construction of the Bridge, is too important to cram into this season. The City Representative who attended the University City Planning Group (“UCPG”) meeting on November 10, 2015, when asked about this timing in the Holiday season, responded that it was necessary because **the Mayor and Council President Lightner wanted the process completed before the November 2016 election!** That is no reason to rush this matter through during the Holiday season – in fact, it smacks of an attempt to railroad the issue through to achieve the result desired by the Council President before she leaves office!
2. Many of the civic organizations and associations, which would be weighing in on this matter of vital importance to businesses and residents concerning the proliferation of traffic in this particular area, do not meet during the month of December, because it is the Holiday season. They are not in a position to comment on the NOP in any official capacity. The UCPG is not meeting in December, 2015 and the Chairperson of the

12/12/2015

Page 2

UCPA, at the aforementioned November 10, 2015 UCPG meeting, voiced her opposition to having the NOP comment period and EIR scoping meeting during the Holiday season.

3. The NOP itself is defective. Obviously, in an effort to push this process through as quickly as possible, someone used a canned version of an NOP that had been used for a previous project. The NOP states that the notice was published in the San Diego Daily Transcript as the official paper of record for the publication. I checked the San Diego Daily Transcript and the newspaper has been defunct since September 1, 2015. In fact, the last official Public Notice was published in the paper on August 27, 2015. Therefore the NOP is defective as describing an official publication of the NOP in a non-existent paper of general circulation.

Therefore, based upon the above objections, demand is hereby made that the NOP, the comment period thereunder, and the EIR Scoping Meeting be postponed as originally dated, and moved out of the Holiday season to sometime in January or February, 2016 so that a more reasonable time frame may be available for all of the communities and organizations affected by the process to fully participate. There is no room in a process of this important nature for it to be shoved through for ulterior motives. Such conduct would not be looked upon favorably by a Court should a legal challenge be made to this unfair process.

Additionally, you need to have a new NOP prepared and issued which will legally comply with the requirement to notify the public of the correct location of the publishing of the Public Notice of the issuance of the NOP in a paper of general circulation.

Sincerely,

A handwritten signature in cursive script that reads "Gregory J. Barnes". The signature is written in black ink and is positioned above the printed name.

Gregory J. Barnes

7165 Calabria Court, Unit D
San Diego, CA 92122
December 12, 2015

VIA FIRST CLASS MAIL and EMAIL TO Planningceqa@sandiego.gov

Susan Morrison, Environmental Planner
City of San Diego Planning Department
1010 Second Avenue, MS 614C
San Diego, CA 92101

Re: PROJECT NAME: University Community Plan Amendment
SCH NO.: Pending
INTERNAL ORDER No. 12002051/11003327

Dear Ms. Morrison:

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12/12/2015

Page 2

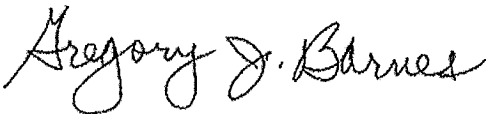
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Sincerely,

A handwritten signature in cursive script that reads "Gregory J. Barnes". The signature is written in black ink and is positioned above the typed name.

Gregory J. Barnes

From: [Gregory J. Barnes, Esq.](mailto:Gregory.J.Barnes@earthlink.net)
To: "auspeed ."; [Morrison, Susan](mailto:Morrison.Susan@gmail.com)
Cc: [Schoenfisch, Brian](mailto:Schoenfisch.Brian@gmail.com); [Monroe, Daniel](mailto:Monroe.Daniel@gmail.com); [Murphy, Jeff](mailto:Murphy.Jeff@gmail.com); [Blake, Martha](mailto:Blake.Martha@gmail.com); [Herrmann, Myra](mailto:Herrmann.Myra@gmail.com); [Garcia, Melissa](mailto:Garcia.Melissa@gmail.com)
Subject: RE: Comments on the NOP for the University City EIR
Date: Saturday, January 02, 2016 8:08:27 AM

Austin, an excellent presentation!

Greg

Gregory J. Barnes

Law Office of Gregory J. Barnes

7165 Calabria Court, Suite D

San Diego, CA 92122

direct dial: 619.787.0302

direct fax: 619.609.0534

gjbarnes@earthlink.net

This is an email from the Law Office of Gregory J. Barnes. This email and any attachments hereto may contain information that is confidential and/or protected by the attorney-client privilege and attorney work product doctrine. This email is not intended for transmission to, or receipt by, any unauthorized persons. Inadvertent disclosure of the contents of this email or its attachments to unintended recipients is not intended to, and does not, constitute a waiver of attorney-client privilege or attorney work product protections. If you have received this email in error, immediately notify the sender of the erroneous receipt and destroy this email, any attachments, and all copies of same, either electronic or printed. Any disclosure, copying, distribution, or use of the contents or information received in error is strictly prohibited.

Federal tax regulations require us to notify you that any tax advice in this electronic message was not intended or written to be used, and cannot be used, for the purpose of avoiding penalties.

From: auspeed . [mailto:auspeed@gmail.com]

Sent: Friday, January 01, 2016 8:57 PM

To: Morrison, Susan

Cc: Schoenfisch, Brian; Monroe, Daniel; Murphy, Jeff; Blake, Martha; Herrmann, Myra; Garcia, Melissa

Subject: Comments on the NOP for the University City EIR

Dear Ms. Morrison,

I have attached a letter with our comments in response to the the Notice of Preparation for the EIR being undertaken to consider changes to the University Community Plan.

We have strong feelings regarding the need for this EIR to be structured and executed correctly and with sufficient time for a complete analysis. Currently planned roadway improvements in the University Community Plan must be properly evaluated to understand their long term value.

Please feel free to contact me if you have any questions regarding this letter.

Respectfully,

Austin Speed

President, Citizens for the Regents Road Bridge

[619-665-6865](tel:619-665-6865)

From: [Gregory J. Barnes, Esq.](#)
To: [PLN PlanningCEQA](#)
Subject: Scoping comments for draft EIR concerning the University Community Plan Amendment, Internal Order No. 12002051/11003327
Date: Saturday, January 02, 2016 7:41:26 AM
Attachments: [Letter with comments for EIR - 1-1-16.pdf](#)

Ms. Morrison, attached please find my letter with my scoping comments for the EIR concerning the above-referenced project. I am mailing the original to you today.

Thank you.

Gregory J. Barnes
7165 Calabria Court, Unit D
San Diego, CA 92122
Telephone:619.787.0302
gjbarnes@earthlink.net

7165 Calabria Court, Unit D
San Diego, CA 92122
January 1, 2016

VIA FIRST CLASS MAIL and EMAIL TO Planningceqa@sandiego.gov

Susan Morrison, Environmental Planner
City of San Diego Planning Department
1010 Second Avenue, MS 614C
San Diego, CA 92101

Re: PROJECT NAME: University Community Plan Amendment
SCH NO.: Pending
INTERNAL ORDER No. 12002051/11003327

Dear Ms. Morrison:

I am writing to you with my written comments regarding the scope and alternatives of the proposed EIR. I wrote to you previously on December 12, 2015 concerning my objections to the timing of the NOP and the Scoping Meeting. In that letter I requested that the NOP, the comment period thereunder, and the EIR Scoping Meeting be postponed as originally dated, and moved out of the Holiday season to sometime in January or February, 2016 so that a more reasonable time frame may be available for all of the communities and organizations affected by the process to fully participate.

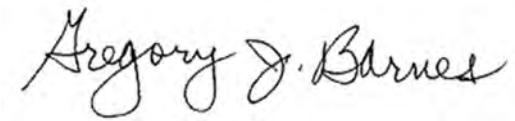
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Page 2
1/1/2016

Please incorporate the above requested comment items into the scoping of the Draft EIR.

Sincerely,

A handwritten signature in black ink that reads "Gregory J. Barnes". The signature is written in a cursive style with a large initial 'G' and 'B'.

Gregory J. Barnes

From: [Gregory J. Barnes, Esq.](#)
To: [PLN PlanningCEQA](#)
Subject: Objections to timing of NOP for the University Community Plan Amendment
Date: Saturday, December 12, 2015 5:54:22 PM
Attachments: [Letter of objection to timing of NOP, comment period and EIR Scoping Meeting.pdf](#)

Ms. Morrison, attached please find my letter of objection to the timing of the NOP, comment period thereon, and the EIR Scoping Meeting, as well as the NOP itself.

Thank you.

Gregory J. Barnes
7165 Calabria Court, Unit D
San Diego, CA 92122
Telephone: 619.787.0302
gjbarnes@earthlink.net

7165 Calabria Court, Unit D
San Diego, CA 92122
December 12, 2015

VIA EMAIL ONLY TO Planningceqa@sandiego.gov

Susan Morrison, Environmental Planner
City of San Diego Planning Department
1010 Second Avenue, MS 614C
San Diego, CA 92101

Re: PROJECT NAME: University Community Plan Amendment
SCH NO.: Pending
INTERNAL ORDER No. 12002051/11003327

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12/12/2015

Page 2

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Sincerely,

A handwritten signature in cursive script that reads "Gregory J. Barnes". The signature is written in black ink and is positioned above the printed name.

Gregory J. Barnes



CITY OF SAN DIEGO

PLANNING DEPARTMENT
ENVIRONMENTAL ANALYSIS

PUBLIC SCOPING MEETING

University Community Plan Amendment / DECEMBER 16, 2015

This meeting is being held pursuant to the *California Public Resources Code Section 21083.9 et seq.*, and is provided to give the public and interested parties an opportunity to submit comments regarding the potential environmental impacts of the proposed project. This information will be used to develop the scope and content of the proposed Environmental Impact Report (EIR) for the project to be described at this meeting. Please record your comments in the space provided below and submit this form to City staff at the conclusion of the meeting or you can mail to the address noted on the back of this form. Thank You.

Comments:

The environmental impact report for the University Community Plan amendment regarding removing the Regents Road Bridge and the widening of Genesee from the University City community plan should examine the changes to the neighborhood of North University City and South University City, if the bridge and widening projects were not to proceed. It is anticipated that the report would reveal removal of these projects from the plan would result in slower population increases, less residential and commercial real estate development, fewer vehicles passing through University City without making a stop, slower increases in air pollution, fewer traffic accidents within University City, and less destruction to the wildlife and ecology of Rose Canyon (resulting from the construction process and also from on-going littering and dumping from the bridge). The report should also highlight the uncertainty in traffic projections within University City resulting from the future availability of increased public transportation options, increases in telecommuting, and the use of autonomous vehicles and the concomitant increase in car-pooling.

Name

HAROLD LEVENE

Signature

Address

2946 RENAULT ST SAN DIEGO, CA 92122

Use back of sheet if additional space is necessary.

Harry L. Mathis
5640 Sandburg Avenue
San Diego, CA 92122-4132
(858) 457-2508, iPhone (858) 945-1233
hmathis1@yahoo.com

January 1, 2016

Ms. Susan Morrison, Environmental Planner
City of San Diego Planning Department
1010 Second Avenue, MS 614C
San Diego, CA 92101

Via: E-Mail (3 pages)

RE: University Community Plan Amendment, Internal Order Number 12002051/11003327

Dear Ms. Morrison:

Background:

My wife, Mary and I have been homeowners in the West end of University City (UC) for more than 45 years in a neighborhood overlooking Regents Road. We moved in when portions of UC were still being developed. We contributed to the assessment that made possible the construction of Sandley Park. SR-52 was only open as far as Genesee, and I-805 was not yet open. The Golden Triangle was all sagebrush, with the exception of some University of California student housing, and the Control Data Corporation Building located on Old Miramar Road, now known as Eastgate Mall, which was the only western access to NAS Miramar then.

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Protest of the timing of the comment period:

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Comments:

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10. The traffic increases caused by the project, when combined with traffic increases from other sources, are likely to cause cumulative traffic impacts on nearby roadways.
11. The traffic increases caused by the project and any significant traffic impacts should be analyzed using the City of San Diego's Traffic Impact Study Manual (July 1998 or current version) and the City's CEQA significance thresholds.
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17. The impacts of the deletion of Regents Road on police and fire response times should be documented and any significant safety impacts should be documented and mitigated. The cost of any additional measures made necessary by the absence of the Bridge should also be documented.

Thank you for the opportunity to comment, There may be more to follow.

Sincerely,

/s/ Harry Mathis

Harry Mathis
5640 Sandburg Avenue
San Diego, CA 92122-4132
858-457-2508, Cell 858-945-1233
hmathis1@yahoo.com

December 13, 2015

Susan Morrison, Environmental Planner
City of San Diego Planning Department
1010 Second Avenue, MS 614C
San Diego, CA 92101
Via e-mail

Re: University Community Plan Amendment, Internal Order Number 12002051/11003327

Dear Ms. Morrison:

My wife and I have resided in a neighborhood overlooking Regents Road for 45 years. I have a long history with the development of the Golden Triangle, and the events and issues associated with the Regents Road Bridge project.

In 1986, as Vice Chairman and then Chairman of the University Planning Group (UCPG), I personally collaborated with the then City Planner, Susan Baldwin, to rewrite the University Community Plan, which was approved by the City Council in 1987, and is the current Plan as amended. During my two terms as District One representative on the City Council (1993-2000), I was instrumental in designating Rose Canyon as an open space park with the proviso that it not interfere with the construction of the Regents Road Bridge. In a meeting with Mayor Faulconer, following approval of the Council Resolution regarding the referenced Community Plan Amendment, I received his personal assurance that the process would be "fair and open."

I am aware of Gregory Barnes' letter to you protesting the timing of the NOP for the EIR and the Scoping meeting. I am writing to state that I am in complete agreement with Mr. Barnes' protest and the reasons given. I consider the scheduling of the comment period and the scoping meeting during the Holiday season to be a breach of the public trust in the fairness of the process. I find it unprecedented to begin the process in such a questionable way. It has the appearance of being a calculated move to limit public participation as a shortcut means of meeting an arbitrary deadline to satisfy political expediency. In so doing, it casts doubt on the fairness of the process, and the credibility and thoroughness of the EIR product and its conclusions. The improper public noticing, and the flaws in the current traffic counts up to this point, are further evidence giving rise to concerns about the integrity of this process in the minds of the public. These must also be remedied.

Please consider this letter as a formal protest against the timing of the NOP and the Scoping Meeting. The only way to remedy this and the flaws in public noticing is to extend the comment period and reschedule the scoping meeting as demanded by Mr. Barnes.

Sincerely,



Harry Mathis

HARRY MATHIS

NOP Comments: Harry Mathis, Friends of Rose Canyon Bridge.

1. Does the designation of the elimination of the Regents Road Bridge and the widening of Genesee as the "preferred project" pre commit the EIR to focus on that as the objective with the focus being to justify it rather than give objective comparisons between the various alternatives?
Given the criteria and guidance in Section K, what set of circumstances would have to be shown to permit one to conclude that the bridge should be built? Based on the wording in Section K, it appears that retaining the bridge is not an option.
2. The Bridge is described in the NOP as two separate one-way spans. Doesn't this increase the footprint on the canyon floor, and increase the overall visual impact? What is the projected cost versus a single span? What is the rationale for the selection of this concept?
3. The Scope of analysis appears to be constrained within the boundaries of the community plan, but the Bridge is not an internal project. It is a gateway project inimical to the flow of commerce in and out of the boundaries such that the impact of the no project alternative must take into account how it affects traffic flows within and without. This must also relate the consequences of diversion of traffic out of way in terms of additional VMT and pollution.
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LARRY MATHEIS

NOP Comments:

- This project proposes to delete proposed roadway improvements from an approved Community Plan. It can reasonably be expected that the project will cause traffic increases on nearby roadways and intersections, some of which are experiencing traffic congestion during peak periods. This will create direct traffic impacts which may be significant.
- The traffic increases caused by the project, when combined with traffic increases from other sources, are likely to cause cumulative traffic impacts on nearby roadways.
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From: [Harry Mathis](#)
To: [PLN PlanningCEQA](#)
Subject: University City Community Plan Amendment, Internal Order No. 12002051/11003327
Date: Friday, January 01, 2016 6:44:19 PM
Attachments: [Mathis Input.docx](#)

Attn: Susan Morrison

Dear Ms. Morrison;

Please see the attached letter for my comments. Although I did give you a rough draft at the Scoping meeting, they should be discarded, and the attached taken as my formal submission. Please advise me if you require a signed copy by mail.

Sincerely,

Harry Mathis

Harry L. Mathis
5640 Sandburg Avenue
San Diego, CA 92122-4132
(858) 457-2508, iPhone (858) 945-1233
hmathis1@yahoo.com

January 1, 2016

Ms. Susan Morrison, Environmental Planner
City of San Diego Planning Department
1010 Second Avenue, MS 614C
San Diego, CA 92101

Via: E-Mail (3 pages)

RE: University Community Plan Amendment, Internal Order Number 12002051/11003327

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Thank you for the opportunity to comment, There may be more to follow.

Sincerely,

/s/ Harry Mathis

From: [Harry Mathis](#)
To: [PLN PlanningCEQA](#)
Subject: Letter of Protest re: University Community Plan Amendment, Internal Order Number 1200205/11003327
Date: Monday, December 14, 2015 12:14:15 AM
Attachments: [NOP Protest.pdf](#)

Attn: Susan Morrison.

Please see my attached formal letter of protest regarding the timing of the NOP and Scoping meeting. Thank you.

Sincerely,

Harry Mathis

Harry Mathis
5640 Sandburg Avenue
San Diego, CA 92122-4132
858-457-2508, Cell 858-945-1233
hmathis1@yahoo.com

December 13, 2015

Susan Morrison, Environmental Planner
City of San Diego Planning Department
1010 Second Avenue, MS 614C
San Diego, CA 92101
Via e-mail

Re: University Community Plan Amendment, Internal Order Number 12002051/11003327

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Sincerely,



Harry Mathis

**PROCEDURAL GUIDE
FOR THE
HABITAT CONSERVATION
FUND PROGRAM**



CALIFORNIA STATE PARKS

*CALIFORNIA DEPARTMENT OF PARKS AND RECREATION
LOCAL AGENCY PROGRAM
under the
CALIFORNIA WILDLIFE PROTECTION
ACT OF 1990
(Proposition 117 Initiative)*

May 1997

**State of California - Resources Agency
Department of Parks and Recreation
Planning and Local Services Section**

**Post Office Box 942896
1416 Ninth Street
Sacramento, California 94296-0001**

**Telephone: (916) 653-7423
FAX: (916) 653-6511**

IMPORTANT

Before you incur costs against the grant, the funds must be appropriated by the Legislature. All requirements must be met and an agreement signed before any funds will be disbursed.

An audit may be performed before or after final payment.

An Application for grant funds consists of one copy each of the following:

1. Application Form
2. Authorizing Resolution from governing body.
3. Environmental Impact Report or Negative Declaration along with a response from the State Clearinghouse; and a copy of the Notice of Determination filed with, and stamped by, the County Clerk; and documentation that the Department of Fish and Game CEQA fee was paid or is not applicable; or a copy of the Notice of Exemption on file with the County Clerk if the project is categorically exempt.
4. Project location map (city or county) with enough detail to allow a person unfamiliar with the area to locate the project.
5. Evidence of adequate land tenure (lease, joint powers agreement, etc.) for development projects.
6. Acquisition map showing exterior boundaries and parcel numbers.
7. Site plan showing location of specific facilities to be developed (development projects).
8. Acquisition Schedule showing each parcel to be acquired (acquisition projects).
9. Cost Estimate (development projects).
10. Indication of amount, type and source of funds above grant provided by applicant.
11. Permit or comments from the following if applicable:
 - a. State Lands Commission
 - b. San Francisco Bay Conservation and Development Commission (BCDC)
 - c. Coastal Commission
 - d. Corps of Engineers
12. All leases, agreements, etc., affecting project lands or the operation and maintenance thereof.
13. Completed project proposal.
14. Photos of project site.

ASSURANCES

Applicant possesses legal authority to apply for the grant, and to finance, acquire, and construct the proposed project; that a resolution, motion or similar action has been duly adopted or passes as an official act of the applicant's governing body authorizing the filing of the application, including all understandings and assurances contained therein, and directing and authorizing the person identified as the official representative of the applicant to act in connection with the application and to provide such additional information as may be required.

Applicant will maintain and operate the property acquired, developed, rehabilitated, or restored with the funds in perpetuity. With the approval of the granting agency, the applicant or its successors in interest in the property may transfer the responsibility to maintain and operate the property in accordance with Section 5919 of the Public Resources Code.

Applicant will use the property only for the purposes of the California Wildlife Protection Act of 1990 and to make no other use, sale, or other disposition of the property except as authorized by specific act of the Legislature.

Applicant will give the State's authorized representative access to and the right to examine all records, books, papers, or documents related to the grant.

Applicant will cause work on the project to be commenced within a reasonable time after receipt of notification for the State that funds have been approved and that the project will be prosecuted to completion with reasonable diligence.

Applicant will comply where applicable with provisions of the California Environmental Quality Act and the California Relocation Assistance Act, any other state, and/or local laws, and/or regulations.

DPR 879 (Back)

RESOLUTION NUMBER R- 289266

ADOPTED ON OCT 07 1997

A RESOLUTION OF THE COUNCIL OF THE CITY OF SAN DIEGO AUTHORIZING THE CITY MANAGER TO APPLY FOR, ACCEPT AND EXPEND A CALIFORNIA DEPARTMENT OF PARKS AND RECREATION HABITAT CONSERVATION FUND GRANT FOR RIPARIAN AND ENHANCEMENT PROJECTS AT MARIAN R. BEAR MEMORIAL PARK AND ROSE CANYON OPEN SPACE PARK.

WHEREAS, the Habitat Conservation Fund Program ("HCF") was created pursuant to the California Wildlife Protection Act of 1990, to provide grants to local public agencies, with a preference to project sites where rare and endangered species are present; and

WHEREAS, the Park and Recreation Department staff have identified two projects that qualify for the HCF grant, one in Marian R. Bear Memorial Park and one in Rose Canyon Open Space Park, both involving the removal of non-native plant materials and replacement with native species; NOW, THEREFORE,

BE IT RESOLVED, by the Council of The City of San Diego, as follows:

1. That the Council hereby approves the filing of an application for a grant from the California Department of Parks and Recreation's Habitat Conservation Fund for riparian and enhancement projects at Marian R. Bear Memorial Park and Rose Canyon Open Space Park.

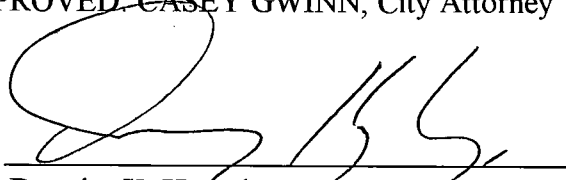
2. That the Council hereby authorizes the City Manager, or representative, to negotiate and execute all agreements necessary to comply with grant requirements, including, but not limited to negotiating and signing agreements, amendments, and payment requests.

3. That the Council hereby authorizes the City Manager, or representative, to accept and expend grant funds from the California Department of Parks and Recreation's Habitat Conservation Fund for the Marian R. Bear Memorial Park and Rose Canyon Open Space Park projects.

4. That the Council hereby authorizes the City Auditor and Comptroller to establish a separate interest bearing fund for each grant received.

APPROVED: CASEY GWINN, City Attorney

By



Douglas K. Humphreys
Deputy City Attorney

DKH:lc

9/23/97

Or.Dept:Pk.&Rec.

Aud.Cert:N/A

R-98-365

Form=r&t.res



CITY OF SAN DIEGO

PLANNING DEPARTMENT
ENVIRONMENTAL ANALYSIS
PUBLIC SCOPING MEETING

University Community Plan Amendment / DECEMBER 16, 2015

This meeting is being held pursuant to the *California Public Resources Code Section 21083.9 et seq.*, and is provided to give the public and interested parties an opportunity to submit comments regarding the potential environmental impacts of the proposed project. This information will be used to develop the scope and content of the proposed Environmental Impact Report (EIR) for the project to be described at this meeting. Please record your comments in the space provided below and submit this form to City staff at the conclusion of the meeting or you can mail to the address noted on the back of this form. Thank You.

Comments: ① If the City is serious about the "Climate Action Plan," no new roads should be considered. Don't know how Genessee could be widened anyway. All monies should be put towards Public Transit, whether light rail, trolley or buses. Obviously we should have a "high-speed" rail between here and S.F. - but that's clearly "pie-in-the sky."

② The only people who care about Rose Canyon are in South U.C. Housing is owned in South UC and mainly occupied by renters in the North. The population is "aging" in the South and young ^{and transient} in the North - hence the need to move kids from Doyle to schools in the south. Build a new elem. school in the North? Enlarge Doyle?

③ "Super Loop" mainly used by UCSD students. Also - several apt. complexes in the North have their own shuttle busses for UCSD destinations.

Name Helen Lebowitz Signature Helen Lebowitz
Address 5310 Renaissance Ave. San Diego, CA 92122 (North U.C.)

10 1/2 yr. resident

Use back of sheet if additional space is necessary.

④ I have no opinion on the Regents Rd. Bridge. Obviously nothing will happen in my lifetime - I'm 72! We're still arguing about the seals at the Cove!

From: [Howard Hackworth](#)
To: [PLN_PlanningCEQA](#)
Cc: [Howard Hackworth](#)
Subject: University Community Plan Amendment
Date: Monday, December 14, 2015 9:18:13 AM

In reference to the upcoming "**Dec. 16 meeting: EIR begins to delete Regents Road bridge**"

I commute on Genesee Ave from Governor dr to Campus Point drive every day. I do not support a Regents Bridge and I am okay not widening Genesee. What needs to be done is this...

Synchronize the TRAFFIC LIGHTS. The less then 4 mile commute can take over an hour at peak time because the lights are so badly timed you can sit endlessly at a single light watching it cycle red-yellow-green, red-yellow-green, red-yellow-green, without moving an inch for 20 minutes or more at each light. Seriously this is not an exaggeration.

Come on people, what year is this? It does not take a rocket scientist to synchronize the lights better to allow traffic to flow steady for a reasonable duration in one direction. If you need someone to help with this project, I am available.

Thanks -

Howard Hackworth

Impact of Highway Capacity and Induced Travel on Passenger Vehicle Use and Greenhouse Gas Emissions

Policy Brief

**Susan Handy, University of California, Davis
Marlon G. Boarnet, University of Southern California**

September 30, 2014

Policy Brief:

http://www.arb.ca.gov/cc/sb375/policies/hwycapacity/highway_capacity_brief.pdf

Technical Background Document:

http://www.arb.ca.gov/cc/sb375/policies/hwycapacity/highway_capacity_bkqd.pdf

California Environmental Protection Agency

 **Air Resources Board**

Policy Brief on the Impact of Highway Capacity and Induced Travel on Passenger Vehicle Use and Greenhouse Gas Emissions

Susan Handy, University of California, Davis
Marlon G. Boarnet, University of Southern California

Policy Description

Because stop-and-go traffic reduces fuel efficiency and increases greenhouse gas (GHG) emissions, strategies to reduce traffic congestion are sometimes proposed as effective ways to also reduce GHG emissions. Although transportation system management (TSM) strategies are one approach to alleviating traffic congestion,¹ traffic congestion has traditionally been addressed through the expansion of roadway vehicle capacity, defined as the maximum possible number of vehicles passing a point on the roadway per hour. Capacity expansion can take the form of the construction of entirely new roadways, the addition of lanes to existing roadways, or the upgrade of existing highways to controlled-access freeways.

One concern with this strategy is that the additional capacity may lead to additional vehicle travel. The basic economic principles of supply and demand explain this phenomenon: adding capacity decreases travel time, in effect lowering the “price” of driving; when prices go down, the quantity of driving goes up (Noland and Lem, 2002). An increase in vehicle miles traveled (VMT) attributable to increases in capacity is called “induced travel.” Any induced travel that occurs reduces the effectiveness of capacity expansion as a strategy for alleviating traffic congestion and offsets any reductions in GHG emissions that would result from reduced congestion. If the percentage increase in VMT matches the percentage increase in capacity, congestion (a function of the ratio of VMT to capacity) is not alleviated at all.

Conversely, some communities have decreased roadway capacity, in part motivated by the goal of reducing VMT. While temporary reductions in highway capacity are common (e.g. through the closure of lanes for construction or emergencies), permanent reductions are relatively rare. San Francisco eventually removed two elevated freeway segments damaged in the 1989 Loma Prieta earthquake, replacing them with street-level boulevards. Many European cities have closed selected streets in their

¹ See the separate policy brief on traffic incident clearance programs:
<http://arb.ca.gov/cc/sb375/policies/policies.htm>

commercial cores to car traffic. This strategy is less common in U.S. cities, but one notable example is the recent elimination of vehicle traffic in Times Square in New York City. Increasingly common in the U.S. are “road diet” projects that re-allocate a portion of the public right-of-way for modes other than cars, though such projects do not necessarily decrease the capacity of the roadway as measured by vehicle throughput.

Impacts of Highway Capacity Expansion

Increased highway capacity can lead to increased VMT in the short run in several ways: if people shift from other modes to driving, if drivers make longer trips (by choosing longer routes and/or more distant destinations), or if drivers make more frequent trips (Noland and Lem, 2002; Gorham, 2009; Litman, 2010). Longer-term effects may also occur if households and businesses move to more distant locations or if development patterns become more dispersed in response to the capacity increase. Capacity expansion can lead to increases in commercial traffic as well as passenger travel (Duranton and Turner, 2011).

The induced-travel impact of capacity expansion is generally measured with respect to the change in VMT that results from an increase in lane miles, determined by the length of a road segment and its number of lanes (e.g. a two mile segment of a four-lane highway equates to eight lane miles). Effect sizes are usually presented as the ratio of the percent change in VMT associated with a one percent change in lane miles. The expectation is that this ratio, also called an “elasticity,” will be positive: an increase in lane miles will lead to an increase in VMT. An elasticity of 1 or greater means that the new capacity is entirely filled by additional VMT, producing no reduction in congestion or GHG emissions; for elasticities between 0 and 1, the closer the elasticity is to zero, the smaller the increase in VMT relative to the increase in capacity, and thus the greater the reduction in congestion and GHG emissions.

Impacts are also sometimes measured as the change in VMT associated with the change in travel time (that results from the change in highway capacity). Many studies analyze the change in the number of vehicles per day on that road segment (a metric called “average daily traffic”). No studies focused on travel time or average daily traffic are included here.

Effect Size

Studies consistently show that increased capacity induces additional VMT. Elasticity estimates of the short-run effect of increased highway capacity range from 0.3 to 0.6,

though one study produced a lower estimate of 0.1 (Table 1). Estimates of the long-run effect of increased highway capacity are considerably higher, mostly falling into the range from 0.6 to just over 1.0. The more recent studies have produced the highest estimates of long-run elasticities using more sophisticated methodologies that are better able to illuminate the impact of highway capacity on VMT (as discussed in the accompanying Technical Background Document). Thus, the best estimate for the long-run effect of highway capacity on VMT is an elasticity close to 1.0, implying that in congested metropolitan areas, adding new capacity to the existing system of limited-access highways is unlikely to reduce congestion or associated GHG in the long-run.

Table 1. Impact of Capacity Expansion on VMT

Study	Study location	Study year(s)	Results	
			Change in VMT/ change in lane miles	Time period
Duranton and Turner, 2011	U.S.	1983 - 2003	1.03	10 years
Cervero, 2003	California	1980 - 1994	0.10	Short term
			0.39	Long term
Cervero and Hansen, 2002	California	1976 - 1997	0.59	Short term (1 year)
			0.79	Intermediate term (5 years)
Noland, 2001	U.S.	1984 - 1996	0.30 to 0.60	Short term
			0.70 to 1.00	Long term
Noland and Cowart, 2000	U.S.	1982 - 1996	0.28	Short term
			0.90	Long term
Hansen and Huang, 1997	California	1973 - 1990	0.20	Short term
			0.60 to 0.70	Long term – counties
			0.90	Long term – metro areas

Even the earlier studies were skeptical about the potential of capacity expansion to reduce VMT, particularly in the long-run. In 1997, Hansen and Huang found that population growth is the most consistent contributor to VMT growth, but that the contribution from increases in lane miles is significant: "...Our results suggest that the urban [state highway lane miles] added since 1970 have, on the whole, yielded little in the way of level of service improvements." Noland (2001) concluded that "Increased capacity clearly increases vehicle miles of travel beyond any short run congestion relief

that may be obtained.” More recently, Duranton and Turner (2011) echoed these earlier studies: “We conclude that increased provision of roads... is unlikely to relieve congestion.”

The effect size appears to depend on the size (whether in terms of population or geographic extent) of the metropolitan area. On a percentage basis, the effects are larger for smaller areas (Schiffer, et al. 2005), likely for a number of reasons. In smaller areas, capacity increases are likely to represent larger percentage increases in total capacity, which then produce larger percentage increases in VMT (Noland and Cowart, 2000). Note that the amount (rather than the percentage) of induced travel is likely to be greater in larger areas than in smaller areas (Hansen and Huang, 1997).

Other factors may also influence the effect size. As noted above, the effect is larger in the long-run than in the short-run, with one study concluding that the full impact of capacity expansion on VMT materializes within five years (Hansen and Huang, 1997) and another concluding that the full effect takes as long as ten years (Duranton and Turner, 2011). The level of congestion is important, as capacity expansion will produce a larger reduction in travel time and thus a larger increase in VMT when congestion is high than when it is low and driving speeds are unconstrained (Schiffer, et al. 2005). In addition, the effect size may depend on fuel prices: when fuel prices are lower, the induced travel effects of expanded capacity tend to be higher, as travel time is a greater share of the cost of travel in this situation (Noland and Lem, 2002). Whether the form of capacity expansion (i.e. new roads or expanded roads) matters is not clear (Schiffer, et al., 2005).

An important question is whether increased VMT on highways following capacity expansion is partially offset by decreases in VMT on other roads. This would be the case if drivers shifted from slower and more congested roads to the new or newly expanded highways. However, Hansen and Huang (1997) found “no conclusive evidence that increases in state highway lane-miles have affected traffic on other roads,” while more recently Duranton and Turner (2011) concluded that “increasing lane kilometers for one type of road diverts little traffic from other types of road.” In other words, capacity expansion leads to a net increase in VMT, not simply a shifting of VMT from one road to another.

Another important question is whether increased highway capacity impacts public transit ridership, or vice versa. The potential interactions are complex. Increased highway capacity could lead public transit riders to shift to driving, thereby contributing to the induced travel effect. Conversely, increased public transit service could entice drivers to replace some driving with public transit, thereby reducing highway traffic and in effect freeing up additional capacity that could then lead to induced traffic. Duranton and

Turner (2011) found no evidence that public transit service affects VMT, suggesting that whatever interactions do occur tend to cancel each other out. In other words, adding transit capacity does not help to reduce congestion, as any freed up capacity is consumed by additional driving.

As noted, some communities have decreased roadway capacity, in part motivated by the goal of reducing VMT. Evidence on the effects of roadway removals or capacity decreases is sparse, however. A 1998 study of 60 locations where road space was taken away from cars in the UK, Canada, Tasmania, and Japan found that, on average, 25 percent of VMT seemed to go away, though the effect size varied widely (Goodwin, et al. 1998). A study of a fourteen-month closure of an important bridge in Calgary, Canada found only a small reduction in trips and little change in behavior with respect to mode (Hunt et al., 2001). Researchers also found limited changes in behavior during the temporary closing for construction of a stretch of Interstate 5 through downtown Sacramento in 2008 (Ye et al., 2012). Studies of the removal of the Central Freeway in San Francisco documented a significant drop in traffic: counts on the boulevard that replaced the freeway were roughly 50 percent less than counts on the freeway (Cervero et al., 2009). Effects on VMT rather than traffic counts have not been assessed.

Evidence Quality

The quality of the evidence linking highway capacity expansion to VMT increases is relatively high, although tying changes in VMT to changes in capacity is challenging. The cited studies use time-series data and sophisticated econometric techniques to estimate the effect size. These studies control for other factors that might also affect VMT, including population growth, increases in income, other demographic effects, and changes in transit service (Noland and Lem, 2002).

Although these studies show a strong correlation between capacity increases and increases in VMT, the direction of causality is an important question in that the anticipation of growth in VMT is generally the rationale for capacity expansion. One study showed that a 10 percent increase in VMT is associated with a 3.3 percent increase in lane-miles (Cervero and Hansen, 2002). However, Fulton, et al. (2000) found that growth in lane-miles precedes growth in VMT, and Duranton and Turner (2011) concluded that “roads are assigned to [metropolitan areas] with little or no regard for the prevailing level of traffic.” The cited studies have found a significant influence of capacity expansion on VMT even after accounting for the reverse effect.

Caveats

Many of the studies focus on California, and the results for these studies are similar to those for the national studies, suggesting that the effects are relatively uniform across the U.S. However, as noted above, the effect size may depend on size of the metropolitan area, existing levels of congestion, and fuel prices, and it is likely to be higher in the long run than in the short run.

GHG Emissions

The effect of capacity expansion on GHG emissions depends on two competing effects: the increase in VMT (which increases GHG emissions), and the reduction in traffic congestion (which tends to decrease GHG emissions). As noted above, any induced travel that occurs reduces the effectiveness of capacity expansion as a strategy for alleviating traffic congestion and offsets any reductions in GHG emissions that would result from improved traffic flow. Noland (2001) predicted that the growth in VMT attributable to increased lane miles would produce an additional 43 million metric tons of CO₂ emissions in 2012 nationwide. Conversely, any reductions in VMT resulting from reductions in capacity will reduce GHG emissions, though if traffic congestion increases as a result of the capacity reduction, the benefits will be offset to some degree.

Co-benefits

Given the induced travel effect, capacity expansion has limited potential as a strategy for reducing congestion. The additional vehicle travel induced by capacity expansion increases GHG emissions as well as other environmental effects, including increased air, water, and noise pollution. On the other hand, capacity expansion potentially generates economic and social benefits, at least in the short run, even if the new capacity is completely filled by induced travel. The additional benefits derive from the fact that the expanded highway is carrying more people, each of whom benefits from his or her travel. However, most studies of the impact of capacity expansion on development in a metropolitan region find no net increase in employment or other economic activity, though highway investments do influence where within a region development occurs (Handy, 2005; Funderberg et al., 2010).

In addition, the construction process itself generates both positive and negative effects. Most obviously, highway construction projects create jobs that can boost the local economy. On the other hand, highway construction projects often have substantial negative effects on the communities through which they are sited, particularly if construction necessitates the removal of homes or businesses. Historically, low-income

and/or minority communities were and continue to be disproportionately affected by such projects.

In contrast, reductions in road capacity tend to produce positive social and environmental effects, and they can also generate economic benefits. For example, many cities in Europe have adopted the strategy of closing streets in the central business district to vehicle traffic as an approach to economic revitalization (Hajdu, 1988; Rodriguez, 2011). Road diet projects are becoming increasingly popular in California and elsewhere in the U.S. as a way to support modes other than driving and enhance the local environment, though their economic impacts have not yet been systematically documented.

Examples

California continues to expand its highway system, though at a far slower rate than during the era of interstate highway construction. According to the national Bureau of Transportation Statistics, California had 31,435 miles of freeways, highways, and arterial roadways in 2010, a 1.6 percent increase from 2005.

As noted above, San Francisco removed two segments of elevated freeway damaged in the 1989 Loma Prieta earthquake. The Central Freeway was replaced with Octavia Boulevard, while the removal of the Embarcadero Freeway enabled substantial improvements to the at-grade Embarcadero Boulevard. Both projects sparked an on-going revitalization of their surrounding areas (Cervero, et al. 2009).

The strategy of closing central business district streets to car traffic is uncommon in California but not unknown. Cities in California that have or have had “pedestrian malls” include Burbank, Oxnard, Pomona, Redding, Redlands, Sacramento, and Santa Cruz. The Fulton Mall in downtown Fresno, closed to traffic in the 1960s, has struggled, despite several revitalization efforts. In contrast, Santa Monica’s Third Street Promenade, closed to traffic in the 1960s, is widely seen as a success in promoting economic activity and creating a thriving community core.

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Acknowledgements

This document was produced through an interagency agreement with the California Air Resources Board with additional funding provided by the University of California Institute of Transportation Studies MultiCampus Research Program on Sustainable Transportation.

From: [James a DeShazo](#)
To: [PLN_PlanningCEQA](#)
Subject: UNIVERSITY COMMUNITY PLAN- Internal Order12002051/11003327
Date: Wednesday, December 09, 2015 9:03:22 PM

Attn Susan Morrison

RE Rose Canyon Bridge

As a 46 year resident of University City, I would like more time to comment on the scope of the EIR, and request a 30 day extension beyond 1 Jan16, to clear the Holidays!

Thank you

James A DeShazo
3660 Syracuse CT
Resident of UC



CITY OF SAN DIEGO

PLANNING DEPARTMENT
ENVIRONMENTAL ANALYSIS

PUBLIC SCOPING MEETING

University Community Plan Amendment / DECEMBER 16, 2015

This meeting is being held pursuant to the *California Public Resources Code Section 21083.9 et seq.*, and is provided to give the public and interested parties an opportunity to submit comments regarding the potential environmental impacts of the proposed project. This information will be used to develop the scope and content of the proposed Environmental Impact Report (EIR) for the project to be described at this meeting. Please record your comments in the space provided below and submit this form to City staff at the conclusion of the meeting or you can mail to the address noted on the back of this form. Thank You.

Comments:

Please add one more alternative excluding the proposed Costa Verde Expansion.
Costa Verde is proposing a 200 room hotel and over 100,000 sq ft of additional retail.

Consider safety of the 919 children attending Doyle Elementary.

Name Janay KRUGER Signature Janay Kruger
Address 4013 Porte de Palmas, #53, San Diego, Calif. 92122

Use back of sheet if additional space is necessary.

From: [janet.bishop](#)
To: [PLN.PlanningCEQA](#)
Subject: University Community Plan Amendment
Date: Sunday, December 06, 2015 12:11:43 PM

The City Council is on legislative recess for most of December and most people have Holiday plans during this time therefore I object to the timing of the NOP and Scoping meeting during the busy holiday season and insist that the comment period is extended at least another 30 days.

Thank you.

Janet Bishop

4219 Pavlov Ave

San Diego, CA 92122

CITY OF SAN DIEGO

PLANNING DEPARTMENT
ENVIRONMENTAL ANALYSIS

PUBLIC SCOPING MEETING

University Community Plan Amendment / DECEMBER 16, 2015

This meeting is being held pursuant to the *California Public Resources Code Section 21083.9 et seq.*, and is provided to give the public and interested parties an opportunity to submit comments regarding the potential environmental impacts of the proposed project. This information will be used to develop the scope and content of the proposed Environmental Impact Report (EIR) for the project to be described at this meeting. Please record your comments in the space provided below and submit this form to City staff at the conclusion of the meeting or you can mail to the address noted on the back of this form. Thank You.

Comments:

I believe that there is still a need for the Regents Bridge and my reasoning is such: we need an alternative road that we can use to get around in University City and also for emergency vehicles. The area is impacted with the building going on around University City, Scripps Hospital, UTC and UCSD. The northern part of University City is densely populated with the apartments and condominiums being built in the area. The traffic problem is compounded further with all the businesses located in the area. The traffic will be a problem because there is not enough north/south roads in/out of University City. I have seen emergency vehicles stuck in the traffic trying to get to south University City but they are stuck like the motorists in the traffic. I hope there were no fatalities because the paramedics could not get to the emergency in a timely manner. I don't believe that additional mass transit will alleviate the traffic because the mass transit still has to go through Genesee. While I understand that there is a concern about open space, does it matter if the train is already running through the canyon. This is the same as in Del Mar or anywhere where the train runs, it is part of progress in an urban setting.

Name JEANNE HOEY Signature Jeanne Hoey
Address 6141 AGEE ST SAN DIEGO CA 92122

Use back of sheet if additional space is necessary.

**City of San Diego, Planning Department
Attn: Susan Morrison, Associate Planner
1010 Second Avenue, MS 614C
San Diego, CA 92101**

From: [Jeanne Hoey](#)
To: [Morrison, Susan](#)
Subject: Comment Response to Regents Bridge
Date: Saturday, January 02, 2016 3:44:34 PM
Attachments: [responsetocity.pdf](#)

Susan,
Attached are my comments regarding the Regents Bridge. I still believe it is needed.
Thank you.
Jeanne Hoey

CITY OF SAN DIEGO

PLANNING DEPARTMENT
ENVIRONMENTAL ANALYSIS

PUBLIC SCOPING MEETING

University Community Plan Amendment / DECEMBER 16, 2015

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Name JEANNE HOEY Signature Jeanne Hoey
Address 6141 AGEE ST SAN DIEGO CA 92122

Use back of sheet if additional space is necessary.

**City of San Diego, Planning Department
Attn: Susan Morrison, Associate Planner
1010 Second Avenue, MS 614C
San Diego, CA 92101**

From: [Jerry Fitzsimmons](#)
To: [PLN PlanningCEQA](#); [Councilmember Sherri Lightner](#); [Mayor Kevin Faulconer](#)
Subject: University Community Plan Amendment, INTERNAL ORDER No. 12002051/11003327
Date: Saturday, January 02, 2016 2:25:09 PM

January 2, 2016

Susan Morrison
Environmental Planner
City of San Diego Planning Department
1010 Second Avenue, MS 614C
San Diego, CA 92101

Subject: Scope of Work for a Draft Environmental Impact Report for the University Community Plan Amendment Project

Dear Susan Morrison,

In addition to the alternative of a Regents Road Bridge project which would construct two separate, parallel two-lane bridge structures across Rose Canyon to connect the present north and south Regents Road ...

I urge the consideration of a single 4-lane bridge project across Rose Canyon with class II bike lanes and sidewalks, including a nature/mountain bike trail and a wildlife corridor on the floor of Rose Canyon under the bridge.

A Regents Road bridge has been in the community plan since I arrived here in 1968. Spending money and effort on an EIR section to remove the bridge element is a waste of public resources and I urge that the EIR NOT INCLUDE impacts related to removing the Regents Road Bridge (or the impact of Genesee Avenue widening) from the University Community Plan Transportation Element.

Sincerely,

Jerry Fitzsimmons

3437 Villanova Avenue,
San Diego, 92122
858-453-5787
jfitzsimmons@ucsd.edu

From: [Jim and Jan Hawkins](#)
To: [PLN_PlanningCEQA](#)
Subject: University Community Plan Amendment
Date: Wednesday, December 16, 2015 7:48:50 PM

Thank you for holding a scoping meeting this evening. Here is our input which we didn't hear covered at the meeting.

Traffic studies must not be done until improved access to I5 at the Genesee intersection is completed. Current construction affects Genesee traffic.

Studies should not be done during construction of the light rail system which will also unnaturally affect traffic flow.

Include the potential impact of activity on the Rose Canyon fault on a hypothetical bridge. Rose Canyon was created because of the fault and Rose Creek evolved because the weakened, fault-tortured soils were easy to erode. The fault rules, not the ducks.

Jim and Jan Hawkins
3233 Wellesly Ave.
San Diego 92122

From: [Joe Colborn](#)
To: [PLN_PlanningCEQA](#)
Subject: EIR Regents Road Bridge
Date: Saturday, January 02, 2016 10:20:22 AM

EIR — Regents Road Bridge, University City

I have been a resident in University City since 1964. The development of this quiet neighborhood has become a high density, high traffic mix of residential, retail, and commercial.

And it is still growing. Even with the later development of I-805 and Hwy 52, the Genesee Ave. traffic eased at first, but began to grow soon after, and will continue to grow. I am very concerned about the intersection of Genesee Ave. and Governor Drive because of the three schools nearby. My sons went to Doyle Elementary, Standley Middle School and UC High School. I was never concerned about the danger of the Genesee Ave. - Governor Drive, which they had to cross every day.

This once quiet, relatively low traffic intersection is now a high traffic density crossing. And it is only going to get worse with even more residential and business development planned near Genesee and north of Governor Drive. These attractions are bringing more traffic from other parts of the San Diego area. Having the alternative route the Regents Road Bridge will provide for not only local residents, but other traffic coming to and through the University City area.

And the delayed access to east University City without the Bridge, for fire, emergency, and police access time has been long discussed. And these facilities are in favor of the Bridge. Building a Fire Station and other city services near Regents Road in University City would likely not be necessary. There is high rail traffic through the bottom of Rose Canyon, which has not scared of the Rose Canyon wildlife, and I do not believe an expansion bridge high above the canyon will do so either. And the Regents Road Bridge is several blocks away from the Rose Canyon Park located to the southwest along I-5.

Thank you for considering my comments and giving the residents a chance to provide information and voice their feelings about the needed Regents Road Bridge.

Respectfully,

Joe Colborn
Dirac Street
San Diego 92122

From: [John Lewis](#)
To: [PLN PlanningCEQA](#)
Subject: UNIVERSITY COMMUNITY PLAN AMENDMENT
Date: Wednesday, December 09, 2015 12:38:32 PM

Attn: Susan Morrison,

I am writing to strongly object to you're scheduling the NOP/Scoping meeting during the holiday season. I like many others will be out of town on December 16th. If in fact I were able, I would certainly attend and express my displeasure at the compressed time schedule for this project.

My understanding is that the primary reason for the tight schedule is the desire to complete the process before the November elections, that is a totally bogus excuse, what are the two individuals afraid of, public input?

Please reschedule the scoping meeting until the beginning of to mid January.

Sincerely,

John Lewis
4006 Calgary Avenue
San Diego, CA 92122
40+ years at this address

From: [Judy Domingos-Porter](#)
To: [PLN_PlanningCEQA](#)
Subject: University Community Plan Amendment 12002051/110033
Date: Saturday, December 05, 2015 9:37:49 PM

Dear Susan Morrison,
Here's another insult to the safety, trust and intelligence of the people of University City and those who travel Genesee Avenue: a rushed schedule during the busiest month of the year! Not only am I leaving early tomorrow for a few days, but after returning a short while, I'll again leave San Diego again for the East Coast. There is very little time to assess the latest situation and fight for what I firmly believe is death and destruction waiting to happen! Surely the fire department's concerns are NOT being respected nor heard on this crisis!

MORE TIME IS NEED TO MAKE CITIZENS OF THE AREA AWARE OF THE DANGER OF NOT BUILDING ANOTHER EXIT FOR THE SAFETY OF CITIZENS AND OUR HOMES

Sincerely,
Judith Domingos-Porter
4110 Calgary Ave.
92122

**Julie Meier Wright
5228 Renaissance Avenue
San Diego, California 92122**

December 16, 2015

Susan Morrison
Environmental Planner
City of San Diego Planning Department
1010 Second Ave., MS 614C
San Diego, CA 92101

Via Email to: PlanningCEQA@sandiego.gov

Re: UNIVERSITY COMMUNITY PLANNING AMENDMENT
Schedule No.: Pending (Internal Order 12002051/11003327)

Dear Ms. Morrison:

As an 18-year resident of the UTC area, which is affected by the University Community Plan Amendment NOP, I have concern that the proposed amendment be considered by the widest cross-section of residents given the number of options to be explored in the EIR.

Neither the University City Planning Group (UCPG) or the University City Community Association (UCCA) meet in December. Your letter was dated December 2. Clearly – with holiday activities and travel at this time of year, as well as the recess of the City Council during December – it is not an optimal time of year to be seeking comments or encouraging substantive dialogue about this scoping amendment.

I urge you to announce a delay in the deadline for comments from January 1 to at least February 1 and to reissue the request for comments immediately after the first of the year.

Thank you for your consideration of this request.

Sincerely,


Julie Meier Wright

From: [Julie Meier Wright](#)
To: [PLN PlanningCEQA](#)
Subject: Attn: Susan Morrison
Date: Thursday, December 17, 2015 12:47:07 PM
Attachments: [12 16 15 UCP Amendment Genesee, Regents Road - Casabella ATT00001.htm](#)

Hi, Susan. I'm submitting a letter to encourage you to delay the comment period for the University Community Plan Amendment (Schedule No.: Pending (Internal Order 12002051/11003327) for at least a month given the difficulties of getting sufficient attention to this important issue during December.

Many thanks for your consideration. Merry Christmas!

Julie

Julie Meier Wright

Public Affairs . Advocacy . Strategic Planning
Strategic Advisor, Collaborative Economics
Consultant, California Council on Science & Technology
8895 Towne Centre Drive, Suite 105 - #110, San Diego CA 92122
C: 619 300 5800

From: [Karin Zirk](#)
To: [PLN_PlanningCEQA](#)
Subject: University City Community Plan Amendment EIR NOP Comments
Date: Sunday, January 03, 2016 8:04:40 PM
Attachments: [EIR_NOP_CommentLetter_FriendsOfRoseCreek.pdf](#)

Dear Ms. Morrison,

Please find the Friends of Rose Creek comments attached.

Regards,
Karin Zirk, Ph.D.
Friends of Rose Creek
Connecting Our Communities
<http://www.saverosecreek.org>



Friends of Rose Creek *

"Connecting Our Communities"

4629 Cass Street #188
San Diego CA 92109



January 2, 2016

Via email transmission

Susan Morrison, Environmental Planner
City of San Diego Planning Department
1010 Second Avenue, MS 614C
San Diego, CA 92101
PlanningCEQA@sandiego.gov

RE: Notice of Preparation of an Environmental Impact Report
for the University Community Plan Amendment

Dear Ms. Morrison:

Thank you for the opportunity to comment on the preparation of the Environment Impact Report for the University City Community Plan Amendment. As a partner in the Rose Creek Watershed, The Friends of Rose Creek are always concerned about potential positive and negative impacts to the entire watershed and especially to the lower portion of the watershed.

Rose Creek is listed as a 303(d) impaired waterway by the State of California. In addition to the creek being listed, the Rose Creek Estuary at Mission Bay is also listed as a 303(3) impaired waterway. Furthermore, sections of the lower portion of Rose Creek are designated as MHPA by the City including fresh water riparian areas and the Salt Marsh and Estuarine zones. Therefore we would like to request that the Environmental Impact Report study the potential positive impacts to all downstream portions of the watershed with the no build alternative as well as negative impacts that may be caused by any of the build alternatives.

The lower portion of Rose Creek is part of a number of comprehensive planning efforts including the Mid-Coast Trolley (<http://www.sandag.org/index.asp?projectid=250&fuseaction=projects.detail>), De Anza Revitalization Plan (http://saverosecreek.org/news/?page_id=1340), the ReWild Mission Bay Project (<http://rewildmissionbay.org/>), the Rose Creek Bikeway Project (http://www.keepsandiegomoving.com/RegionalBikeProjects/coastal_rail_trail_docs.aspx), and the Balboa

**A member of the Rose Creek Watershed Alliance*

** A Friends Group of San Diego Canyonlands, Inc.*

Visit us on-line at <http://www.saverosecreek.org>

Avenue Trolley Station Planning Area (http://saverosecreek.org/news/?page_id=1349). Furthermore, water quality in Rose Creek has a direct impact on Mission Bay Park – the largest aquatic recreational area in the United States. We are especially concerned about the cumulative impacts of all these projects in maintaining water quality and habitat for native plants and animals.

Specifically, we ask that the City of San Diego study the cumulative impacts of all these projects in conjunction with the proposed alternatives and identify both potential positive and negative biological, water quality, visual and noise impacts to wild animals, birds, insects and children, who use the park as a respite from living in a largely urban area. Furthermore, as this EIR is studying transportation alternatives, I would urge you to take into account the proposed safe and legal bicycle crossing at I-5/Highway 52 in terms of alternative bicycle traffic (See http://scc.ca.gov/webmaster/ftp/pdf/sccbb/2010/1005/20100527Board17_Rose_Creek_Trail.pdf) and the potential transportation options to be opened up via this project. I believe you already intend to study the Mid-Coast Trolley as a potential transit alternative to private vehicles. In addition, creating safe and legal railroad crossings for pedestrians and bicyclists in Rose Canyon will allow more individuals to enjoy the canyon while heading to their destination and this alternative should be included as encouraging human powered transportation is a key component of the City of San Diego's Climate Action Plan. Removing barriers to human powered transit between North and South University City as well as between South University City and the excellent bicycle corridor to the west is a key strategy to encouraging healthy transit options.

The Rose Creek Watershed Opportunities Assessment (See <http://www.rosecreekwatershed.org/projects/>) outlines a number of potential enhancements in the area and was accepted by City Council in 2008. I strongly urge you to incorporate findings from this study into the draft EIR. Finally, I would request that the draft EIR include all impacts that result in direct or indirect physical changes in the environment, not only in the immediate areas of the proposed alternatives, but within the watershed as a whole.

Respectfully,


Karin Zirk, Ph.D.

**A member of the Rose Creek Watershed Alliance*

**A Friends Group of San Diego Canyonlands, Inc.*

Visit us on-line at <http://www.saverosecreek.org>

Susan Morrison
Environmental Planner
City of San Diego Planning Department
1010 Second Avenue, MS614C, San Diego, CA 92101

Ms. Morrison:

I would like to state my firm support of keeping the Regents Road bridge in the University City Community Plan. I offer the following reasons for my support of the bridge project.

- South University City (the area bounded between Rose Canyon and San Clemente Canyon aka South UC) is poorly served by fire and rescue services. EMTs and Fire responders can get gridlocked on Genesee and 805 South trying to respond to emergencies in South UC during evening rush hour. They are often forced to drive southbound, in the northbound lanes of Genesee, creating additional hazard and confusion. The secondary fire station in North Clairemont also runs into issues with traffic responding to south UC.
- Wildfire egress: The current egress paths out of south UC involve driving into a canyon (fire zone) on Genesee North, Genesee South, and Regents Rd. south. The Regents Road Bridge would span the canyon, allowing egress over the fire zone. It would also provide a much needed egress path for those on the west side of south UC if the fire was occurring in San Clemente Canyon.
- Dangerous intersection: Genesee and Governor Drive is one of the most congested intersections in the city. A few years ago a bicyclist was struck and killed by a police car responding to a call. My husband and son witnessed a young child hit by a car at this intersection. I've heard reports of other children being hit at the intersection. Genesee is a heavily used corridor by all of south UC, as shown by the 2 lane left turn lanes from Governor to Genesee. The right turn lanes impact pedestrians and bicyclists.
- The only path for families north of Rose Canyon to get to Standley Middle school is Genesee. Because Genesee does not span the canyon, rather it goes into the canyon, the distance, and steepness are an issue for these kids to walk or bike to school. Additionally, with the very heavy traffic in the morning, it is unsafe for them to walk or bike to school along Genesee. Regents Road bridge, spanning the canyon with less elevation change, would provide a safer and easier pedestrian and bike path to get to Standley Middle school.
- San Diego Unified School district recently held a UC school cluster meeting. The plan is to have families in UTC/North UC attend Spreckels and Curie Elementary. The vast majority would be diverted from Doyle to Spreckels. This is because Doyle is overcrowded and Spreckels has capacity. Again, the only path from north of the canyon is Genesee. It would be feasible for families to walk their children to school at Spreckels with the Regents Road Bridge.
- Finally, traffic volume. Anyone who has driven Genesee northbound between 7am and 9:30am knows it is a parking lot. The same is true from about 4pm and 6:30pm in the southbound direction. This is not just workers in UTC trying to get to and from 52 and their offices, it's also parents taking their kids to UC high school in the morning, and local residents avoiding southbound 805 in the afternoon. The volume will likely increase as the trolley station comes online as residents of South UC and North Clairemont commute to the new trolley stop. There

is too much volume. Opponents to the bridge worry that some of this volume would shift to the Regents Road corridor. Of course it would. Why build a bridge if no one needs it. Unfortunately, there is a significant need for another north/south corridor north of Governor, for cars, bicycles, and pedestrians. That includes commuters.

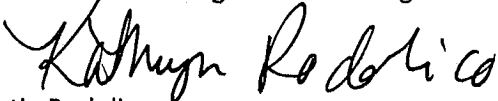
You'll notice several of these issues involve potential loss of life if the bridge is not built due to traffic accidents, egress during conflagration, and emergency response times lengthened due to traffic. These should be weighted heavier than a perspective of protecting private canyon vistas.

I have some questions for this process:

- Will the bridge design conform with the aesthetic requirements called for in the community plan? These include greenery draping over the sides. An ugly bridge that simply spans the creek and railroad tracks in the base of the canyon will meet huge resistance from the community and not address the egress in a conflagration issue.
- If Genesee is widened from 4 lanes to 6, how is the Governor and Genesee intersection to be handled? The median space has already been absorbed to make turn lanes. This intersection is the key to any widening effort since it is a very long light cycle and backs up significantly during rush hour. Morning rush hour coincides with children crossing Genesee to get to Curie Elementary and Standley Middle schools.
- Will the impact of the new trolley stop at UTC be analyzed in the traffic survey?
- Will any polling be done in the community before the EIR is finalized and presented to the planning group and to city council? Unofficial polls in the past have showed clear support for building the bridge by about a 2/3's margin. But these opinions are drowned out by vocal residents who border the canyon and members of Friends of Rose Canyon. If Friends of Rose Canyon were truly a group advocating for discovery/use of the open space, they would be advocating for access to the canyon. There is no parking and only 3 entry points into the canyon: Genesee, the south side of the canyon at Regents Rd, and walking from Marion Bear San Clemente canyon. There are no entry points for community members on the north side of Rose Canyon since the Amtrak/coaster tracks prevent access. Friends of Rose Canyon seems to want a private space, owned by the city, for their personal use.

I am in full support of building the bridge. I moved to UC as a four year old in the mid 60's, attended Curie, Marston and Clairemont HS (before Standley and UCHS were built). It's been on the plan since 1959, and needs to be built. I am in support of widening Genesee if the issues with Genesee and Governor can be addressed to improve safety. I don't see how 6 lanes plus turn lanes will work at Genesee and Governor.

Please leave the Regents Road bridge in the plan.



Katie Rodolico

5906 Dirac Street, San Diego, CA 92122; 858-774-3041

From: [Katie Nelson Rodolico](#)
To: [PLN_PlanningCEQA](#)
Subject: University Community Plan Amendment, INTERNAL ORDER No. 12002051/11003327
Date: Tuesday, December 29, 2015 12:12:09 PM

Susan Morrison, Environmental Planner
City of San Diego Planning Department
1010 Second Avenue, MS614C, San Diego, CA 92101

Ms. Morrison:

I would like to suggest the following factors be considered when conducting the EIR to assess impacts of removing the bridge and road widening projects from the University City Planning Document.

Emergency Access: This is not just response time to an incident in south UC from the fire station in North UC – but also the return to the closest hospitals. If the bridge is not built and Genesee is not widened then there are several hours each day (4-5) that are impacted by rush hour. In the morning the ambulance cannot head north to the hospital in a timely manner after stabilizing the patient. In the afternoon the ambulance cannot reach the patient to provide emergency care.

Safety for pedestrians and bicyclists at Genesee and Governor: This includes school children and their parents walking or biking to the 3 schools near this intersection: Curie Elementary, Standley Middle, and UC High. Many parents park at the Vons parking lot and cross the intersection at Genesee and Governor to walk their kids to Curie. Middle schoolers who live east of Genesee must cross this intersection. All of this happens at rush hour when the intersection is the most congested with cars.

Wildfire egress: If a wildfire were to come up San Clemente Canyon (in the fire department's fire zone) the only egress from UC would be 805 or Genesee. If the fire is coming from the east (as is typical during Santa Anas which stoke wildfires) the people exiting via 805 would be more at risk. If the fire is in Rose Canyon, Genesee drops to canyon level – taking evacuees into harm's way. A bridge across Rose Canyon (above the canyon) would provide a safer exit path.

UC School Cluster realignment of elementary schools: Doyle is at full capacity and Curie and Spreckels have excess capacity. SDUSD recently announce they will be moving children who live in the Doyle boundaries to Spreckels and Curie. This will increase volume on Genesee during the morning rush hour. If the bridge is not built the only path for children who wish to walk or ride bikes to Curie, Spreckels, or Standley, from the north side of Rose Canyon, is Genesee, a heavily congested, dangerous road.

Traffic Volume: The housing and business density in North UC/UTC was approved with the Regents Road bridge on the plan. Would that same level of density be approved without the bridge? Genesee and Governor has many accidents a year.

805, even with the widening, is not adequate for the volume, nor is I-5 as approached from west 52. So people go on Genesee. Offloading some of this volume to an alternate path is part of the solution. Increasing the capacity of Genesee solves part of the problem but does not address the safety concerns of children attending Curie, Standley, or UCHS.

Lastly – a question: If Genesee is to be widened – how will this be handled at Genesee and Governor. The intersection does not have width to add another lane in either direction. We've already lost the bike lane on Governor when they added left turn lanes onto Genesee from Governor. We'd lose the bike lanes and possibly the right turn lanes if Genesee is widened. This would create new and different problems that need to be fully analyzed. Analysis should include impact to pedestrians and bicycles that cross this intersection.

Please add me to any notification system you have for this project. I would like to be involved in any community feedback.

Sincerely,

Katie Rodolico
5906 Dirac Street, San Diego, CA 92122; 858-774-3041
ktnelson@yahoo.com

From: [Jenne, Keith](#)
To: [PLN_PlanningCEQA](#)
Subject: PROJECT NAME: University Community Plan Amendment SCH NO.: Pending
Date: Saturday, January 02, 2016 7:22:58 PM
Attachments: [induced_demand_powerpoint.ppt](#)

Good Afternoon.

Please allow this email to serve as a submission of public comment for consideration in the Environmental Impact Report regarding the impacts related to removing the Genessee Avenue Widening and Regents Road Bridge project from the University Community Plan Transportation Element.

As a resident of the community, I am deeply concerned that NOT removing these projects from the community plan, and proceeding with these projects will double or triple the number of traffic lanes THROUGH the University City Community. With respect to Genessee Avenue Widening, this will further divide a cohesive community into an East and West sections. Genessee Avenue is already difficult and dangerous to cross. As residents of the West side, we travel to the East side daily, and we worry that a larger roadway will make it that much more difficult. It would also impact the community adjacent to, or on Genessee Avenue in that traffic lanes will be much closer to residents and businesses, which will negatively affect their quality of life and vitality in addition to the increased noise and air pollution.

Adding Regents Road Bridge will cause an even greater division of the community between the East and West side of Regents Road in South University City. Currently this is a cohesive community, and adding the connection of North and South Regents Road with a bridge, adding increased traffic that accompanies this connection will greatly divide University City into three segments (East of Genessee, West of Regents, and the section between Genessee and Regents). Nearly all of us in South University City will be negatively impacted by a new thoroughfare that will divide our cohesive community. Current recommendations are to "avoid disruptions in social and economic activities that make the community vibrant and economically sound, and minimize the splitting of community by taking in to account local movements at the road design stage and by making provision for improved crossing or alternative access routes for community interactions" (1).

Additionally, I request that due consideration be given to the concept of Induced Demand, which is a research finding recently accepted by California Department of Transportation (2).

Adding additional lanes of thoroughfare will only add more vehicles traveling through our community. This will add more noise and air pollution, and decrease the quality of life in our community, in addition to the obvious impact and disruption to the the Rose Canyon open space. I am sure your traffic studies will show, what those of us in University City already know: The true congestion evident on Genessee Avenue is mainly Southbound commuter traffic in the afternoon. If these vehicles are redirected onto the freeway in the afternoon instead of short-cutting through our community, we would not have a traffic concern in our community. Adding additional capacity through our community will only invite other commuter vehicles through our community, which will impact our community in a substantial way.

Please take these factors into consideration when addressing the Environmental Impact of these proposed removal of the Genessee Avenue Widening and Regents Road Bridge project

from the University Community Plan Transportation Element. Thank you, Mayor Falconer, and Council President Lightner for your thoughtful consideration of this important move toward a sustainable future of University City community.
Respectfully,

Keith Jenne
6346 Bunche Terrace
San Diego, CA 92122

1. **Multistage Environmental and Social Impact Assessment of Road Projects; Guidelines for a comprehensive process. UN ESCAP**

http://docs.sandiego.gov/citybulletin_publicnotices/CEQA/PN1300%20NOP%20PN%20Date%2012-2-15.pdf

2. <http://smartgrowth.org/californias-dot-admits-that-more-roads-mean-more-traffic/>
http://www.dot.ca.gov/research/docs/10-12-2015-NCST_Brief_InducedTravel_CS6_v3.pdf



Understanding the Concept of Latent Demand in Traffic

Prof. Patricia L. Mokhtarian

Civil & Environmental Engineering, UC Davis

plmokhtarian@ucdavis.edu

www.its.ucdavis.edu/telecom/

(530) 752-7062

Outline of this Talk

- What are latent and induced demand, and their implications?
- Empirical approaches to assessing induced demand
 - Typical results
 - Limitations
- UC Davis study using matched pairs
- More recent work: Cervero/Hansen & Choo/Mokh.
- Summary
- Concluding thoughts

What is Latent Demand?

- Often used interchangeably with “induced demand”, but the two concepts can be technically distinguished as follows:
 - ***Latent demand:*** Pent-up (dormant) demand for travel, travel that is desired but *unrealized* because of constraints
 - ***Induced demand:*** *Realized* demand that is generated (induced, “drawn out”) because of improvements to the transportation system

Induced Demand

- The increment of new vehicle traffic that would not have occurred at all without the capacity improvement.
- Clear in theory, but difficult in practice!
- Observed increases in traffic on a capacity-enhanced network link can arise from a variety of sources:

When is Traffic Growth Induced Demand?

- ✘ Shifts in departure time
- ? Changes in route or destination (no for vehicle trips but maybe for VMT)
- ✔ Shifts from shared modes to drive alone
- ✔ New or longer trips to existing locations
- ✘ Background demographic growth (WFOA)
- ? Trips generated by new development attracted to the improved corridor

Why do we Care about Induced Demand?

- Need to be able to forecast newly-created travel (that WNHOA):
 - Affects the cost-benefit calculation for the improvement
 - Affects the assessment of environmental impacts
- Legal/political ramifications:
 - Sierra Club v. MTC, 1989
 - UK abandoned “predict and provide” policy in mid ’90s

Empirical Approaches

- Case studies
- Cross-sectional disaggregate modeling
- Cross-sectional aggregate modeling
- Time series aggregate modeling
- Cross-sectional/time series aggregate modeling
- Time series link/facility level analysis with controls

Case Studies

- Change in traffic on single facility measured
- Results mixed, but have generally found observed volumes higher than forecasts
- May highlight idiosyncratic circumstances
- Often short-term; difficult to distinguish induced demand from shifted demand or background growth

Cross-sectional Disaggregate Modeling

- Using 1995 NPTS (travel diary data), analyze association of VMT with speed
- Higher speeds associated with greater VMT
- Speed is a more behaviorally-sound influence on VMT than capacity
- Association doesn't guarantee causality; can't identify long-term impacts

Cross-sectional Aggregate Modeling

- Models impact of lane-miles on VMT for metro areas in US
- Increase of 1% in lane-mi leads to $\sim 0.8\%$ increase in VMT
- Potentially represents long-term equilibrium
- Bi-directional causality impossible to untangle with single equation, no dynamic element

Time Series Aggregate Modeling

- Decomposed VMT growth (Milwaukee, 1963-1991) into sources based on assumed relationships
- 6-22% of total VMT growth attributable to new capacity
- Regional focus; decomposition approach useful
- Still only one direction of causality permitted

Cross-sectional/Time Series Aggregate Modeling

- Models VMT as function of lane-mi among other variables, for multiple areas over time
- 1% increase in ln-mi \rightarrow 0.2 – 0.9% increase in VMT (long-run $>$ short-run)
- Advantages:
 - Covariates help capture background influences
 - If area large enough, demand shifts accounted for
 - Temporal precedence can be established

Cross-sectional/Time Series Aggregate Modeling (cont'd)

- Disadvantages:
 - Not all background influences captured
 - Facility/metro-level analyses subject to confounding with changes in classification and urban boundary over time
 - Even temporal precedence doesn't guarantee causality
 - Effectiveness of lagged variables depends on whether planning horizon is longer than the lag

Time Series Link/Facility Level Analysis with Controls

- Compares growth in ADT on improved links, to that on matched set of unimproved links
- Study of 18 matched prs in CA (UCD faculty) found no difference in growth rates
- Controls for causes of growth common to improved and comparison segments
- Several disadvantages:

Time Series Link/Facility Level Analysis (cont'd)

- Disadvantages:
 - Difficult to find suitable controls
 - Doesn't control for spatial shifts from nearby
 - Cannot establish a control for an entirely new link
- Another possible reason for difference:
ADT v. VMT: new capacity may affect trip *length* more than *frequency*

Recent Work: Cervero/Hansen

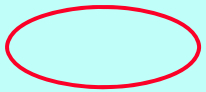
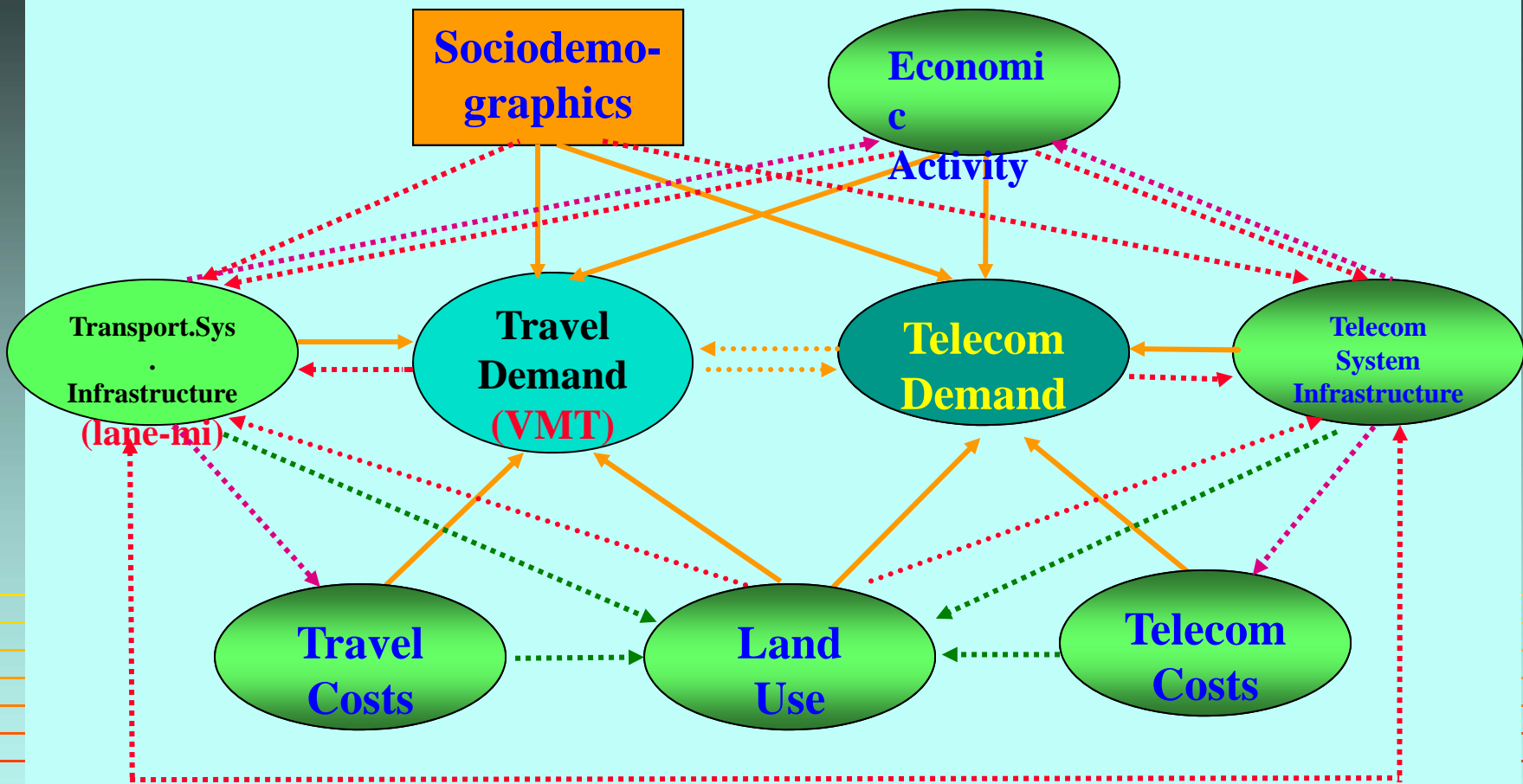
- Cross-sectional/time series aggregate
 - state hwys, 34 CA counties, 1976-97
- Simultaneous equations:
 - Lane-miles \rightarrow VMT
 - VMT \rightarrow lane-miles
- Both directions of causality significant, lane-miles \rightarrow VMT the stronger direction

Cervero/Hansen (cont'd)

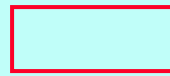
- Probably the most rigorous published study to date
- Issues:
 - Did facility reclassification, metro area effects confound relationships?
 - What happened to traffic on lower-classification facilities?
 - Are the instrumental variables appropriate?
 - Is the high goodness-of-fit spurious?
 - Were the lags long enough?

Recent Work: Choo/Mokhtarian

- Time series aggregate (USwide, 1951-2000)
- Comprehensive structural model



Endogenous Variable Category



Exogenous Variable Category

Choo/Mokhtarian (cont'd)

- Time series aggregate (USwide, 1951-2000)
- Comprehensive structural model
- Corrected for high correlations due to similar temporal trends
- Also found both directions of causality significant, lane-miles \rightarrow VMT the stronger direction

Summary

- It's a complex issue!
- Each approach has advantages and disadvantages, something to offer but not definitive answers
- To better understand extent to which answer depends on method, apply multiple methods to same region
- Nevertheless, the most sophisticated analyses find evidence for induced demand

Concluding Thoughts

- Transportation demand will continue to grow
- Thus, can't eliminate all system improvements just because demand will increase
- Should rather weigh the costs (increased fuel consumption, emissions) against the benefits (increased mobility, economic gain)
- Need to continue to improve our measurement and modeling of both costs and benefits
- And continue efforts to more appropriately price the provision of service

From: [Dodson, Kimberly@DOT](mailto:Dodson.Kimberly@DOT)
To: [PLN_PlanningCEQA](#)
Cc: [Armstrong, Jacob M@DOT](mailto:Armstrong.Jacob.M@DOT); Scott.Morgan@opr.ca.gov; [Ghossain, George](#); [Morrison, Susan](#)
Subject: University Community Plan Amendment SCH# 2015121011
Date: Thursday, January 07, 2016 11:00:59 AM
Attachments: [University CP letter - 2016-1-7.pdf](#)

Greetings:

Please find attached a copy of the comment letter for the University Community Plan Amendment Notice of Preparation for Draft Environmental Impact Report (SCH# 2015121011). An original copy will follow via regular mail.

Thank you,

Kimberly D. Dodson, GISP

Caltrans District II Planning|Associate Transportation Planner

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DEPARTMENT OF TRANSPORTATION

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January 7, 2016

11-SD-VAR
(5, 52, 56, 805)University
Community Plan Amendment
SCH# 2015121011

Ms. Susan Morrison
City of San Diego
Planning Department
1010 Second Avenue, Suite 1400, MS 614C
San Diego, CA 92101

Dear Ms. Morrison:

Thank you for including the California Department of Transportation (Caltrans) in the environmental review process for the City of San Diego's (City) University Community Plan Amendment (Plan), for which the areas are served by Interstate 5 (I-5), State Route 52 (SR-52), State Route 56 (SR-56) and Interstate 805 (I-805). The mission of Caltrans is to provide a safe, sustainable, integrated, and efficient transportation system to enhance California's economy and livability. The Local Development-Intergovernmental Review (LD-IGR) Program reviews land use projects and plans to ensure consistency with our mission and state planning priorities of infill, conservation, and efficient development. To ensure a safe, efficient, and reliable transportation system, we encourage early consultation and coordination with local jurisdictions and project proponents on all development projects that utilize the multi-modal transportation network.

Caltrans has reviewed the Notice of Preparation (NOP) for the University Community Plan Amendment draft Environmental Impact Report (EIR), and has the following comments:

The Caltrans Traffic Impact Study Guidelines should be used for analyzing Caltrans facilities. The information is available at:

http://www.dot.ca.gov/hq/tpp/offices/ocp/igr_ccqa_files/tisguide.pdf

Caltrans recognizes that there is a strong link between transportation and land use. Development can have a significant impact on traffic and congestion on State transportation facilities. In particular, the pattern of land use can affect both total vehicle miles traveled and the number of trips. Caltrans strongly encourages local agencies to work towards a safe, functional, interconnected, multi-modal system.

Caltrans supports the concept of a local circulation system that is pedestrian, bicycle, and transit-friendly in order to enable residents to choose alternative modes of transportation. As a result,

Ms. Susan Morrison

January 7, 2016

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potential transit mitigation for development impacts should also be analyzed, such as improved transit accommodation through the provision of park and ride facilities, bicycle access, signal prioritization for transit, or other enhancements that can improve mobility and alleviate traffic impacts to State facilities.

The City should continue to coordinate with Caltrans to implement necessary improvements at intersections and interchanges where the agencies have joint jurisdiction, as well as coordinate with Caltrans as development proceeds and funds become available to ensure that the capacity of on-/off-ramps is adequate.

Please note that any work performed within Caltrans Right of Way (R/W) (e.g. for community gateways in the Land Use and Urban Design Elements) will require discretionary review and approval by Caltrans and an encroachment permit will be required for any work within the Caltrans R/W prior to construction. Additional information regarding encroachment permits may be obtained by contacting the Caltrans District 11 Encroachment Permits Office at (619) 688-6158 or visiting the following website: <http://www.dot.ca.gov/hq/traffops/developserv/permits/>. Early coordination with Caltrans is strongly advised for all encroachment permits.

Caltrans appreciates the continued coordination with City staff and community representatives on this Plan. If you have any questions, please contact Kimberly Dodson at (619) 688-2510.

Sincerely,



JACOB ARMSTRONG, Branch Chief
Development Review Branch

From: [Kimberly Ho](#)
To: [PLN PlanningCEQA](#)
Subject: Removal of Regents Road Bridge from community plan
Date: Sunday, December 13, 2015 6:00:22 PM

Thank you for removing the Regents Road Bridge concept from the community plan. My hope is that the many upcoming mass transit options and freeway widening will help commuters have many other options than driving through neighborhoods, and destroying open spaces.

Kimberly Ho
3014 Award Row
San Diego, CA 92122

Deborah Knight
Friends of Rose Canyon
Rosecanyon@san.rr.com
6804 Fisk Avenue
San Diego, CA 92122

Submitted via email (Comments and attachments submitted separately)

Scoping Comments
Project: University Community Plan Amendment
Jan. 4, 2016

Dear Ms. Morrison:

Friends of Rose Canyon strongly supports the deletion of the Regents Road bridge project from the University Community Plan. While our focus is on the Regents Road bridge project due to its many profoundly negative impacts, we are pleased that the City is proposing to remove the Genesee Avenue widening as well. While its impacts are lesser than those of the Regents Road bridge project, both of these road projects are antiquated proposals out of step with a long list of environmental regulations, commitments and goals as well as many of the City's goals for walkable, livable urban communities.

1. Project Description

The DEIR must clearly describe "The Project": i.e., the Community Plan Amendment (CPA) to remove the Regents Road bridge project and Genesee Avenue widening project from the Transportation Element of the University Community Plan (UCP). The CPA was initiated on 9/29/14 in a resolution approved unanimously by the City Council and supported by the Mayor. The DEIR should describe the purpose, goals and objectives of the project, including those related to preserving Rose Canyon.

The NOP's description of the Project is quite vague. It mentions the removal of the Regents Road Bridge/Genesee Avenue widening and each of the five project alternatives in one sentence, thereby giving the impression that all of the alternatives – including the Project itself – will be given equal weight in the EIR. Generally an NOP will clearly describe the Project and indicate the purpose of the Project. Separately, it will then identify and describe each of the Project's alternatives, including an explanation as to why each alternative was selected, e.g., to avoid or reduce the Project's environmental impacts. In this case, however, the City's current range of alternatives would actually result in greater environmental impacts than the proposed Project.

Project Objectives

Clearly a key objective of the Project in deleting the Regents Road bridge project is to preserve Rose Canyon. This objective was articulated by Mayor Faulconer and Council President Lightner at their press conference on 9/25/14, which was held at the dead end of Regents Road overlooking Rose Canyon Open Space Park to highlight this objective (see

Attachment 1: Press Release; and City News Room video of the Press Conference at Regents Road Bridge Plan). In addition, Resolution R-2015-142 initiating the CPA (**Attachment 2**) refers to the USFWS/CDFW's strong recommendation in 2005 and 2006 that the City remove the Regents Road bridge project from the UCP, and the RWQCB's 2005 and 2006 warnings that it would be difficult for the City to get permits for the Regents Road bridge project. The Resolution also cites the commitment that the City made to the State of California to preserve in perpetuity the Regents area of Rose Canyon Open Space Park when it accepted a state Habitat Conservation Fund restoration grant for that area.

A second objective of the Project, as stated by Mayor Faulconer at his press conference, is to improve emergency services with new fire stations, particularly in south UC.

A third objective of the Project, as stated in the City Council Resolution, is implementation of General Plan goals in the UCP, especially as they relate to the vision, values and City of Villages strategy and the provision of public facilities

The focus by the Mayor, Council President Lightner, and the USFWS/CDFW has been, appropriately, on removing the Regents Road bridge project from the UCP, as it would be far more environmentally damaging than the Genesee Avenue widening. However, removing the Genesee widening would also help preserve Rose Canyon, as well as meet the Project's other objectives.

Attachment 1: Mayor's Press Release, Sept. 25 2014
"Faulconer, Lightner Back Plan to Protect Canyon Park, Start Community Process to End Regents Road Bridge Controversy – City to study removing cross-canyon bridge project from community plan, review new fire stations for University City."

Attachment 2: Resolution R-2015-142 initiating the CPA

Attachment 3: Link to Video of Press Conference: [Regents Road Bridge Plan](#)

2. Environmental Setting

The Regents Road bridge project is an antiquated proposal that should be deleted from the UCP and the General Plan. The following should be discussed in the DEIR.

Rose Canyon was acquired by the City in 1979 specifically to "preserve" Rose Canyon. The November 1979 Ordinance No. 0-15073 expressly sets aside and dedicates Rose Canyon as "Rose Canyon Open Space Preserve."

The DEIR should address the history of the Regents Road bridge project and the many changes that have occurred since the 1987 UCP update. The project has always been problematic due to the topography of its location and its major negative environmental and community impacts. The EIR should address how removal of the Regents Road bridge project from the UCP fits with the changes in environmental regulations, conservation goals

and commitments, and planning goals that have occurred since 1987. These include:

- 1997 – “The Multiple Species Conservation Program (MSCP) was adopted to preserve and manage sensitive species at the ecosystem level through habitat protection.” (General Plan, p. CE-13). Much of Rose Canyon was included in the MSCP as part of the Urban Lands MHPA.
- 1997 – 2002: The City accepts a Habitat Conservation Fund (HCF) grant from CA State Parks and commits to preserve in perpetuity the Regents area of Rose Canyon (**Attachment 4** – 1997 City Council Resolution approving HCF grant; Attachment 5, Excerpt of Assurances for HCF grant). In the 2003 MSCP report to the USFWS/CDFG (and submitted to the Mayor and City Council) the City cites on p. 8 under MHPA “Management Activities” the restoration work done with the HCF grant. (**Attachment 6**)
- 2007 – 2015: the City carried out the Rose Canyon Wetland and Upland Mitigation Project in Rose Canyon located immediately to the east and west of where the Regents Road bridge project would be built. The project was required by state and federal regulatory agencies as mitigation for sewer pipeline repair projects; (**Attachment 7, p. 21 & Fig. 4**). In 2011, the City cited this project in their annual MSCP report. In 2015, the City contracted for additional watering of trees in the wetland creation areas (**Attachment 8, Fig. 2 - aerial maps of the Rose Canyon mitigation sites showing ACOE and CDFW jurisdictions**).
- The 2008 General Plan Update includes many goals and policies that support removal of the Regents Road bridge project as well as the Genesee Widening. Among these are: Open Space and Landform Preservation, Watershed Planning to Preserve and Enhance Wetlands, Walkability, Neighborhood Character, Recreation, and Environmental Education. These two road projects directly conflict with these and other aspects of the General Plan.
- 2015 - The Climate Action Plan
- 2016 - the new MS4 permit takes effect, which is far more stringent than the previous 2007 permit (the 2001 permit was in effect when the previous EIR was done on the Regents Road bridge project and the Genesee Widening project.) It is doubtful that the Regents Road bridge project could comply with the new permit.

The DEIR must include a comprehensive description of the environmental setting.

Rose Canyon contains multiple important protections, and provides multiple environmental benefits to people and wildlife, to the local community, to the Rose Creek Watershed, and to all San Diegans. The DEIR should, at a minimum, describe the following:

Rose Canyon is an Open Space Park

The City’s Park and Recreation Website describes Open Space Parks as:

“Open Space within the City of San Diego is defined as areas generally free from development or developed with low intensity uses that respect natural environmental characteristics. Open Space Parks are used for purposes such as preservation of natural resources, passive outdoor recreation and scenic and visual enjoyment.”

The DEIR should describe Rose Canyon Open Space Park and address how removing the Regents Road bridge would be in alignment with the City’s goals for Rose Canyon Open

Space Park. While the Genesee widening would have a lesser impact on the park than the , removing the Genesee Widening would also align with these goals.

The MSCP

Much of the Rose Canyon greenbelt is in the MSCP (MHPA), including almost all the area near Regents and some of the area near Genesee.

The DEIR should address the joint letters from the USFWS/CDFG that repeatedly state the Regents Road bridge project would not be in compliance with the MHPA and calling on the city to delete the Regents Road bridge project from the UCP.

Attachment 9: USFWS/CDFG letter on the UCNSTCS DEIR (2005)

Attachment 10: USFWS/CDFG letter on the UCNSTCS FEIR (2006)

The DEIR should address how removing the Regents Road bridge project would support the following MSCP management policies and directives. To a far lesser extent, removing the Genesee Avenue Widening would do so as well.

a. City of San Diego website – MSCP, 1.5.7

Specific Management Policies and Directives for Urban Habitat Lands

Goals and Objectives

“The optimum future condition for the urban habitat lands scattered throughout the City of San Diego is a system of canyons that provide habitat for native species remaining in urban areas, “stepping stones” for migrating birds and those establishing new territories, and environmental educational opportunities for urban dwellers of all ages. The system of urban habitat canyons and natural open space throughout the City provide important areas for people to enjoy and learn about the natural world and local environment. These areas also afford visual enjoyment and psychological relief from urbanization, while supporting habitat for the maintenance of both common and rare species. This habitat, surrounded by development and modified through time, presents unique opportunities for research into fragmentation, edge effects, and urban wildlife ecology.”

b. Covered Species in the Regents Road area include California Gnatcatcher

The EIR should address the protection of both the birds themselves and their habitat.

Attachment 11: Figure 4.3-7, UCNSTCS EIR – aerial showing the MHPA and the California gnatcatcher sightings in the area of the Regents Road bridge project

c. The City’s MSCP webpage lists the following as “Major Issues for the Urban Habitat Lands.”

1. Intense land uses and activities adjacent to and in covered species habitat.
2. Dumping, litter, and vandalism.
3. Itinerant living quarters.
4. Utility, facility and road repair, construction, and maintenance activities.
5. Exotic (non-native) and invasive plants and animals.

6. Urban runoff, and water quality.

The EIR should address how removing the Regents Road bridge project and the Genesee widening would reduce or prevent these problems in the Rose Canyon MHPA lands and how building these road projects would lead to an increase in these problems.

3. The DEIR should clearly identify the major impacts of the Regents Road bridge project

Note: “Landform Alteration” should be added to the list of environmental impacts evaluated in the DEIR.

In addressing any of the alternatives that include building the Regents Road bridge project, the DEIR should describe the specifics of the Regents Road bridge project. These are well documented and contribute to the project’s major impacts, including Biological Resources, Visual Effects, Landform Alteration, Neighborhood Character, Hydrology/Water Quality, and Noise.

The City already has volumes of information on the environmental impacts of the Regents Road bridge project.

The City has spent \$3.63 million dollars on environmental impact analysis of the Regents Road bridge project and the Genesee Avenue widening (see North University City 2013 FBA, p. 21 and 29 for amounts already spent).

These studies include:

- Draft Project Constraints Report - Regents Road Bridge Project prepared by Dudek & Associates, 1994.
- UC North South Transportation Corridor Study Project EIR, 2006 prepared by Project Design Consultants (the EIR studied both the Regents Road bridge and Genesee Ave. widening projects)

The information in these studies identifies numerous major negative biological, visual, noise, water quality, and other impacts of the Regents Road bridge project. Both studies also conclude that due to topography, there is no way to connect the two ends of Regents Road with a bridge. There are two existing fixed road ends, each sloping toward the canyon with a large hill in between them. The southern portion of the project will be a cut and fill road rather than a bridge.

Attachment 12: Regents Road bridge project aerial (UCNSTCS EIR)

As shown in this aerial, over 40% of the distance between the two existing road ends would NOT be a bridge, but 700’ of new cut and fill roadway requiring massive grading in Rose Canyon Open Space Park, the MHPA and the area preserved due to the HCF grant. This 2006 EIR design is almost exactly the project design in the 1994 Projects Constraint Report.

The EIR should address the fact that due to the topography of the canyon, the Regents Road Bridge project does NOT span Rose Canyon with a bridge. The Project requires

construction of a cut and fill road for 700' from Lahitte Court northward to the middle of Rose Canyon. Construction of this cut and fill road would require filling in to a depth of about 50' the canyon near the south rim, and bulldozing away much of a large hill (covered with coastal sage scrub) to construct a road to the middle of the canyon. There, the bridge portion of the project would begin (on the north side or what is left of the large hill) and extend 870' to the north side of the canyon.

The city paid different consultants to do the 1994 Environmental Constraints Report and the 2006 Project EIR, and they both came up with the same way – and the only way possible - to build the Regents Road bridge project. PDC, the consultants doing the 2006 EIR, were even required in their contract to come up with two different designs and could not do it.

The UCNSTCS Environmental Impact Report, June, 2006, p. 3-14, gives the following description of the Regents Road bridge project:

“The bridge portion of the project alternative spanning Rose Canyon would be approximately 870 feet long. However, an additional 1,690 feet along Regents Road and undeveloped land also would be affected. This additional length of impact includes existing roadway widening for transitions, and *approximately 700 feet of new road construction via cut and fill from Lahitte Court to the south edge of the bridge.*” (Italics added.)

P. 4.7-3 Regents Road Bridge – Landform Alteration (note, the EIR bizarrely refers to the large hill in the canyon that it would have to cut through as a “ridge.”)

“Significant landform alteration impacts would occur as a result of the Regents Road Bridge alternative. In addition, as discussed in Section 3.3.1.2, the Regents Road Bridge Alternative would involve cut and fill across a portion of a tributary to Rose Canyon and a ridge adjacent to the south edge of the canyon. Construction of the bridge and connecting cut-and-fill would involve approximately 88,000 cubic yards of earthwork. An estimated total of 6 acres would be affected by grading. Natural slopes exceeding 25 percent would be affected by the alternative. A 2:1 cut slope would be created in the ridge on the on the south edge of the canyon, south of the bridge span, and the cut would be up to 70' high. 2:1 fill slope would be created in a portion of a tributary to Rose Canyon The fill slope would have a maximum dept of 40 feet.”

While the City's contract with PDC required them to come up with two different designs for the bridge project, PDC failed to identify any alternative to the 700' of cut and fill roadway leading to an 870' box girder bridge.

The Draft Project Constraints Report, May 1994, concludes a very similar cut and fill road plus box girder bridge is the only way to build the Regents Road bridge project.
Executive Summary:

“The new roadway and bridge through the canyon is on a straight line connecting the existing horizontal curves on each side. The vertical alignment through the canyon is almost entirely with a sag vertical curve conforming to Caltrans standards. A large fill be required as the roadway enters the canyon on the south side creating excessive cover over an existing sewer line. North of the fill a large cut is required which will encroach into private property.”

“The proposed bridge is approximately 870 feet long and spans the deepest part of the canyon at an approximate height of 60 feet. Several structure types were considered for the bridge (large arch, truss and cable-stayed) solely for aesthetic purposes. As these types of bridges were found to be not suited for this application, all three were discounted. The type of bridge best suited for this site is the concrete box girder.

P. 22 - “Extensive grading will be required for the construction of Segment 2.” [From Lahitte Court north to the beginning of the bridge.] A large fill of approximately 50’ in depth will need to be constructed at the beginning of this segment. North of the fill a cut slope of up to 70’ in height is required. A preliminary earthwork calculation indicates that the volumes of cut and fill material to be closely balanced at approximately 45,000 cubic yards.”

4. The DEIR should identify the value of Rose Canyon as a Wildlife Corridor

Rose Canyon is recognized as a wildlife corridor and an MSCP Biological Core Area by both the City of San Diego, and SANDAG. To the east, connectivity for wildlife extends under I-805 to the large area of undeveloped land on MCAS Miramar. To the west, wildlife can pass under the 52 and into San Clemente Canyon (Marian Bear Park).

Attachment 13: Map Showing Rose Canyon as a Wildlife Corridor

Since 2003, the San Diego Tracking Team has been recording wildlife data quarterly along a transect in Rose Canyon. The DEIR should include data from the San Diego Tracking Team in its analysis of the value of Rose Canyon as wildlife habitat. The SD Tracking Team data is uploaded to the CA Dept. of Fish and Wildlife BIOS database.

Attachment 14: San Diego Tracking Team Rose Canyon Transect Location

Transect #51 begins at Genesee Ave. and continues through Rose Canyon Open Space Park to west of the bottom of the Regents trail. This map shows the data points along the transect.

Attachment 15: San Diego Tracking Team data for Rose Canyon 2003-2007

The Tracking Team regularly document the presence of bobcats in Rose Canyon, a species that is far more sensitive to disturbance than coyotes.

Attachment 16: San Diego Tracking Team data for Rose Canyon 2007-2014

The Tracking Team regularly document the presence of bobcats in Rose Canyon, a species that is far more sensitive to disturbance than coyotes.

The DEIR should identify the value of Rose Canyon as connected habitat and discuss the benefit to the habitat of removing the Regents Road bridge project.

Attachment 17: “Relative Sensitivities of Mammalian Carnivores to Habitat Fragmentation.”

Kevin R. Crooks published a study of carnivore populations in urban habitat fragments in coastal San Diego in Conservation Biology, April 2002. He concluded (p. 501): “Landscape

connectivity appears to be the key to the persistence of bobcat populations in developing landscapes. They can persist in fragmented habitats, but, as my results suggest, only in those landscapes with adequate movement linkages to larger natural areas. The status of bobcat populations is therefore a valuable indicator of the degree of functional, landscape-level connectivity across much of the fragmented landscapes of coastal southern California.”

5. The DEIR should discuss the Habitat Conservation Fund Grant for “Riparian Habitat Enhancement/Restoration at Rose Canyon Open Space Park”

The actions taken by the City in relation to the HCF grant are mentioned on p. 3, above. The DEIR should also discuss communications from state agencies regarding this commitment.

Attachment 18: 2006 Letter from CA State Parks reiterating the Contract Provision the City agreed to in accepting the HCF grant to preserve the area.

Attachment 19: The RWQCB comment letter on the UCNSTCS FEIR (2006) raises the issue of the City’s commitment to the State to preserve the Regents area in perpetuity.

5. The DEIR should address Water Quality and Watershed Impacts

The DEIR should address regulatory issues related to the Regents Road bridge project and the Genesee widening. These were raised by the RWQCB in 2005 and 2006, and raised serious questions as to whether the Regents Road bridge project could receive the required permits. Since then, the regulations have become significantly more stringent.

Attachment 19: The RWQCB comment letter on the UCNSTCS FEIR (2006)

Attachment 20: RWQCB comment letter on the UCNSTCS DEIR (2005)

The EIR should address the issue of compliance with the new 2013 MS4 permit. It would likely be extremely difficult for the Regents Road bridge project to comply with the new regulations. Among other issues, all bioswales and other devices to capture road runoff would need to be located where there is road access and be regularly maintained. It could also be difficult for the Genesee Widening to comply. Both road projects will drain directly, into Rose Canyon. The Regents Road bridge project would drain into the MHPA. The DEIR should address how the Project (deleting the Regents Road bridge project and Genesee Widening) would prevent water quality impacts in Rose Creek and the Rose Creek watershed.

The Rose Creek Watershed

The EIR should address the watershed benefits of deleting the Regents Road bridge project and the Genesee Widening. Rose Creek is the major fresh water tributary of Mission Bay.

Mission Bay & La Jolla Water Quality Improvement Plan (WQIP)

The DEIR should address the ways in which the Project (deleting the two road projects) is in

line with the goals of the Mission Bay Water Quality Improvement Plan (WQIP), and how building the Regents Road bridge project in particular (and to a lesser degree the Genesee widening) would be contrary to these goals.

The WQIP is described on the City's Project Clean Water website:

“A new Water Quality Improvement Plan (WQIP) was developed for the Mission Bay Watershed Management Area in accordance with the requirements of the San Diego Regional Water Quality Control Board (Regional Board) Order No. R9-2013-0001, as amended by Order No. R9-2015-0001 (NPDES Permit #CAS0109266, Municipal Permit). The plan was developed in partnership with the City of San Diego and Caltrans, who are the Responsible Agencies in the Mission Bay Watershed Management Area.

The goal of the Mission Bay WQIP is to protect, preserve, enhance, and restore water quality of receiving water bodies. This goal will be accomplished through an adaptive planning and management process that identifies the highest and focused priority water quality conditions within the watershed and implements strategies (jurisdiction-specific and/or watershed-level) to achieve improvements in the quality of discharges from the Responsible Agencies storm drain systems.”

7. General Plan

The DEIR should address how removing the Regents Road bridge is in line with the Conservation Element and many other aspects of the General Plan, including Climate Change, Open Space and Landform Preservation, Urban Runoff Management, Recreation, Air Quality, and Environmental Education.

Some of the relevant goals and policies from the General Plan are:

Open Space and Landform Preservation Goal (CE-12)

“Goal: Preservation and long-term management of the natural landforms and open spaces that help make San Diego unique.

Open space may be defined as land or water areas that are undeveloped, generally free from development or developed with low-intensity uses that respect natural environmental characteristics and are compatible with open space use. Open space may have utility for: primarily passive park and recreation; conservation of land, water, or other natural biological resources; historic or scenic purposes; visual relief; or landform preservation. San Diego's many canyons, valleys, mesas, hillsides, beaches, and other landforms create a unique setting that fosters biodiversity, a sense of place, and recreational opportunities.”

Policies

CE-B.1. Protect and conserve the landforms, canyon lands, and open spaces that: define the City's urban form; provide public views/vistas; serve as core biological areas and wildlife linkages; are wetlands habitats; provide buffers within and between communities; or provide outdoor recreational opportunities.”

CE-C.6 Implement watershed management practices designed to reduce runoff and improve the quality of runoff discharged into coastal waters.

E. Urban Runoff Management – P. CE-26

Goals

“Protection and restoration of water bodies, including reservoirs, coastal waters, creeks, bays and wetlands.”

Discussion: “Open space areas and permeable surfaces are important to ensuring water quality.”

Policies

CE-E.2 – “Direct concentrated drainage flows away from the MHPA and open spaces.”
“Open space areas and permeable surfaces are important to ensuring water quality.”

CE.E.7 – “Manage floodplains to address their multi-purpose use, including natural drainage, habitat preservation, and open space and passive recreation, while also protecting public health and safety.” (P. CE-30)

G. Biological Diversity (P. CE-35 and following)

“**Goal:** Preservation of healthy, biologically diverse regional ecosystems and conservation of endangered, threatened, and key sensitive species and their habitats.”

Policies: particularly CE-G.1, G.2, G.3, and G.5.

H. Wetlands – P. CE-36

Goals:

- ◆ Preservation of San Diego’s rich biodiversity and heritage through the protection and restoration of wetland resources.
- ◆ Preservation of all existing wetland habitat in San Diego through a “no net loss” approach.

Policies:

CE-H.1 – Use a watershed planning approach to preserve and enhance wetlands.

CE.H.4 - Support the long-term monitoring of restoration and mitigation efforts to track and evaluate changes in wetland acreage, functions, and values.

CE.H.8 - Implement a “no net loss” approach to wetlands conservation in accordance with all city, state, and federal regulations.

N. Environmental Education

CE-N.9 Expand educational opportunities within open space lands and regional parks.

The DEIR should note that hundreds of students from UCHS, Standley Middle School, Curie Elementary, Spreckels Elementary, and Doyle Elementary as well as Boy Scouts and

Girl Scouts visit Rose Canyon each year for environmental education.

Recreation Element

Purpose – P. RE-3

“To preserve, protect, acquire, develop, operate maintain and enhance public recreation opportunities and facilities throughout the City for all users.”

Discussion: P. RE-3

“Parks can improve the quality of life by strengthening the body and assisting in maintaining physical well-being. Mental and social benefits include visual relief from urban development, passive recreational opportunities that refresh the frame of mind and provide opportunities for social interaction, and healthy activities for youth. Park and open space lands benefit the environment by providing habitat for plants and animals, and space for urban runoff to percolate into the soil, while also serving to decrease the effects of urban heat islands.”

Mobility Element - P. M-3

Introduction: “An overall goal of the Mobility Element is to further the attainment of a balanced, multi-modal transportation network that gets us where we want to go and minimizes environmental and neighborhood impacts.”

The DEIR should address how deleting the Regents Road bridge project and Genesee widening project would not just minimize but avoid major negative environmental and community impacts.

The EIR should evaluate how deleting the Regents Road bridge project would protect the walkability and community character of the area on either side of Regents Road north of Rose Canyon – and how building the Regents Road bridge project would degrade that neighborhood.

To reduce carbon emissions, the City's current focus is on building higher density, walkable, transit-oriented communities. That is exactly what the area near Regents north of Rose Canyon is. There are many families with young children, and they walk across Regents to attend Doyle Elementary and use Doyle Park and Recreation Center. A large number of UCSD students live in the area, most of whom use transit. The Superloop and the UCSD shuttles provide a high level of frequent transit. Construction of the Regents Road bridge project would add a large amount of new traffic to this neighborhood and undermine the very aspects of this neighborhood that the City says it wants to promote.

A. Walkable Communities (P. ME-6)

Goals

- ◆ A city where walking is a viable travel choice, particularly for trips of less than one-half mile.
- ◆ A safe and comfortable pedestrian environment.
- ◆ A complete, functional, and interconnected pedestrian network, that is accessible to

pedestrians of all abilities.

- ◆ Greater walkability achieved through pedestrian- friendly street, site and building design.

The DEIR should address how removing these two road projects would enhance the walkability of neighborhoods both south and north of Rose Canyon.

The Regents Road bridge project would greatly increase traffic on Regents both south and north of Rose Canyon. This large increase would pass near Spreckels Elementary and directly past Doyle Elementary and Doyle Park and Recreation Center. Widening Genesee would presumably bring an increase in traffic past UC High School and near Curie Elementary and Standley Middle School.

The neighborhood on either side of Regents on the north side of Rose Canyon fits the definition of the General Plan's Mobility Element strategy: "Residences within close proximity of parks, schools, shopping, employment and transit stops." (p. ME-7) Large numbers of children walk across Regents to attend Doyle Elementary. Many people cross Regents to use Doyle Park and Recreation Center. The area has a high number of UCSD students, most of whom use public transit. And the area has frequent, accessible public transit, including the Super Loop and the UCSD shuttles.

The DEIR should discuss the fact that the community immediately east and west of Regents Road on the north side of Rose Canyon has many of the features of a walkable community cited on p. ME-7, including:

- Compact, mixed-use neighborhoods linked by public transportation¹ (see Land Use and Community Planning Element, Section A; and ME Sections A and B).
- Residences within close proximity of parks, schools, shopping, employment, and transit stops² (see Land Use and Community Planning Element, Section A; and Recreation Element, Section D).
- A safe and accessible walking environment³ (see ME Section A).

The DEIR should discuss how the Project, by removing the Regents Road bridge project, would support and maintain this neighborhood's walkability, while building the Regents Road bridge project would degrade its walkability.

8. University Community Plan

The DEIR should describe the many ways in which removing the Regents Road bridge and preserving Rose Canyon supports the goals of the UCP

The DEIR should address the numerous instances that the UCP refers to the great value of Rose Canyon and its preservation. In the 1987 UCP, there is a great discrepancy between the value the UCP places on Rose Canyon and the proposal to build the Regents Road bridge project, which stands in stark contrast to the goals of preservation. Removing the Regents Road bridge project from the UCP would bring those aspects of the plan into harmony.

Examples of the great value the UCP places on Rose Canyon and its preservation:

Open Space and Recreation Element

P. 225 “The open space in the University planning area serves primarily three functions: the preservation of topographic or biotic resources and habitats for resident and migratory birds, the provision of outlets for active or passive recreation and the protection of public health and safety. The community possesses a varied and largely undeveloped topography, which provides the opportunity to develop an outstanding open space system.”

“Rose Canyon and San Clemente Canyon are also considered regional resources.”

P. 226 - “The steep slopes and pronounced valley floor are important scenic assets to the community and can serve to separate and define the neighborhoods to the north and south.”

P. 233 - “Future uses of Rose Canyon should consider the topography, vegetation and scenic value of the canyon. For this reason, passive recreational uses are recommended rather than active uses requiring major grading and construction.”

P. 236 explains that the UCP contains only 60% of the population-based parks required in the General Plan. It goes on to say, “This shortfall in population-based parks is mitigated by the four resource-based parks located in or adjacent to the community totaling over 2,065 acres.” (p. 225 lists the four parks: Torrey Pines State Reserve, Torrey Pines City Park and golf course, San Clemente Canyon and Rose Canyon). Thus Rose Canyon is all the more important to preserve, as it is supposed to compensate for the lack of population-based parks written into the UCP. Furthermore, that lack of population-based parks was calculated for the 1987 estimated population of 58,263. Per SANDAG 2010 data, the UCP area is already well above that. And the city has approved a number of additional large residential projects that have not yet been built (Monte Verde, and Westfield), and La Jolla Crossroads II, which is just opening.

Resource Management Element

P. 264 - Goals – A – “Preserve the community’s natural topography, particularly in the coastal zone and in major canyon systems.”

Natural Resources: “Many of the community’s biological resources are proposed for preservation in natural parks, as specifically address in the Open Space and Recreation Element.”

South University Subarea Plan

P. 131 - “Objective: Protect Rose and San Clemente canyons as natural regional resources, and preserve the open space character of the various finger canyons which traverse the subarea.”

The 1987 Community Plan states (p. 228) that the plan includes 90.6 acres of Population Based Parks (north and south of Rose Canyon). On p. 236, it states that for the estimated population of 58,263, there should be 138 acres of population based parks, leading to a shortfall of 47.4 acres of population based parks. Furthermore, since 1987, plan amendments

have increased the projected population of the area by many thousands of residents (UC Village, Monte Verde, La Jolla Crossroads, Westfield, West End, Genesee West). SANDAG lists population of our planning group area as 62,731 in 2010 - and the approved additional residential projects (most of which have not yet been built) will add thousands of additional residents.

List of 20 Attachments

Attachment 1: Mayor's Press Release – Sept. 25, 2014 Press Conference

Attachment 2: CPA Amendment Resolution, 9/29/14

Attachment 3: [Video link to Mayor's Press Conference](#) – “Regents Road Bridge Plan”

Attachment 4: 1997 City Council Resolution approving HCF grant

Attachment 5: Assurances from Procedural Guide For the Habitat Conservation Fund Program, CA State Parks, May 1997 (excerpt)

Attachment 6: City's 2003 MSCP Report citing work in HCF grant area (see Fig. 2)

Attachment 7: 2014 PUD Report Including Rose Canyon Upland and Wetland Mitigation sites - see p. 21 and Fig. 4

Attachment 8: PUD Scope of Work for Additional Habitat Restoration Maintenance for San Clemente and Rose Canyon Mitigation Projects – See Fig. 2 for aerial map of the Rose Canyon sites showing ACOE and CDFW jurisdictions

Attachment 9: USFWS/CDFG Comment letter on UCNSTCS DEIR, 2005

Attachment 10: USFWS/CDFG Comment letter on UCNSTCS FEIR, 2006

Attachment 11: Regents Rd. bridge project aerial - MHPA, Gnatcatchers – UCNSTCS EIR

Attachment 12: Regents Rd. bridge project Cut and Fill Aerial – UCNSTCS EIR

Attachment 13: Rose Canyon Wildlife Corridor Map (City/SANDAG)

Attachment 14: San Diego Tracking Team Rose Canyon Transect Location

Attachment 15 : San Diego Tracking Team Rose Canyon Data, 2003-2007

Attachment 16: San Diego Tracking Team Rose Canyon Data, 2007-2014

Friends of Rose Canyon: Scoping Comments, University Community Plan Amendment

Attachment 17: Article on bobcat sensitivity to disturbance

Attachment 18: Letter for CA State Parks re HCF commitment – 2006

Attachment 19: RWQCB UCNSTCS FEIR comment – 2006

Attachment 20: RWQCB UCNSTCS DEIR comment - 2005

From: [LaRu DeKock](#)
To: [PLN PlanningCEQA](#)
Subject: Rose Canyon
Date: Monday, December 14, 2015 10:44:55 AM

Big thanks to you and your colleagues for your efforts to prevent the Regents Road Bridge from being built. (My son used to take my granddaughter down there to hike and to pick up and remove ugly debris.)

LaRu DeKock

P.S. Even though I live in Renaissance, I worry about the lack of a fire department in *south* University City. A fire department would be a better investment for all that \$. Remember that tragic plane crash? I heard a rumor years ago that someone named Stuart, (don't know his last name, but I think he represented a company called Garden Communities?), had offered to donate the land for the building (on one of the corners at Genesee and Governor, no less!). If that's true, the city council should have pounced on it. What a perfect location for that suburb's fire department.



AUG 04 2006

Mr. Ted Medina, Director
Parks and Recreation Department
202 C Street, MS-9B
San Diego, CA 92101

Re: DPR Project Number: HR 37-005 -- ROSE CANYON OPEN SPACE PARK

Dear Mr. Medina,

This letter is to confirm the telephone conference call on July 24, 2006 the Office of Grants and Local Services (OGALS) had with your staff regarding a pending issue on the above Habitat Conservation Fund (HCF) project. We were following up on a letter from the City of San Diego (City) dated October 24, 2005 requesting OGALS to review and provide direction for the City regarding the proposed Regents Road Bridge. My apologies for the time it took OGALS to get back to the City on this request.

OGALS also wants to use this letter to clarify California State Parks (CSP) authority relative to any change in use of the grant project area, and CSP's continued oversight of any land which benefited from HCF program.

Contract Provision H (1), found on page 73 of the Procedural Guide for the Habitat Conservation Fund Program (Procedural Guide) states that the "Applicant agrees that the property acquired or developed with grant moneys under this agreement shall be used by the Applicant only for the purposes of the California Wildlife Protection Act of 1990 and no other use, sale, or other disposition of the area shall be permitted except by specific act of the Legislature." Therefore under the HCF, CSP does not have the authority to approve changes to the use, sale or disposition of any grant-funded property.

Contract Section H (2), also on page 73 of the Procedural Guide, outlines CSP's ongoing oversight of grant-funded property. This section states that "The Applicant agrees to maintain and operate in perpetuity the property acquired, developed, restored or enhanced with these funds." Based on this contractual agreement between the grantee and CSP, it is the grantee's responsibility to inform CSP of any changes to this agreement. Therefore, if the City decides to proceed with any proposals which would impact the Rose Canyon Open Space Park, it must inform CSP by letter to OGALS, the administrator of the HCF for CSP.

Mr. Ted Medina

AUG 04 2006
Page Two

Hopefully this addresses the City's questions regarding options associated with changes to grant-funded property. If you have further questions, please contact me at (916) 651-8597 or by email at pkeat@parks.ca.gov. We appreciate your interest in the HCF and for bringing the proposed Regents Bridge project to our attention.

Sincerely,



Patti Keating, Chief
Office of Grants and Local Services

Attachment

cc: April Penera, Deputy Director, San Diego DPR
Carol Wood, Grants Administrator, San Diego DPR
State Senator Kehoe
Assemblymember Saldaña
Jean Lacher, Acting Manager, OGALS
Deborah Viney, Supervisor, OGALS
✓ Bill Boston, Project Officer, OGALS

From: [Jose Aurrecoechea](#)
To: [PLN PlanningCEQA](#)
Subject: UNIVERSITY COMMUNITY PLAN AMENDMENT: Schedule No.: Pending (Internal Order 12002051/11003327).
Date: Saturday, December 12, 2015 3:41:03 PM

Dear Ms. Morrison;

I am writing today to urge a much more comprehensive traffic study before taking the Regents Road Bridge out of the community plan. I was recently coming home heading south on I5 when I learned that an accident had blocked the ramp to East 52, which was where I had planned to exit. I exited the freeway at Genesee and travelled to south UC on the surface streets. It took over an hour to go from the freeway to Governor Drive.

I cannot imagine that the expansion of UTC and then a following expansion at Costa Verde would do anything to help this situation. I have lived in UC since 1987 and the bridge had been in the plan before I moved to this area. Many of the people who work in the north UC area have no idea that there are three schools within a block of the corner of Genesee and Governor, and are very frustrated by the slowing in the area around school schedules.

While I understand the concerns of folks who are against the bridge, I am more concerned with the health and safety of the students and other citizens. Personally I avoid going to UTC at any high traffic time and have stopped going to the farmer's market day due to traffic on Genesee.

Please make sure that any and all traffic stressors (development) are considered before making any more changes to the community plan.

Sincerely,
Lisa Sutton



CITY OF SAN DIEGO

PLANNING DEPARTMENT ENVIRONMENTAL ANALYSIS PUBLIC SCOPING MEETING

University Community Plan Amendment / DECEMBER 16, 2015

This meeting is being held pursuant to the *California Public Resources Code Section 21083.9 et seq.*, and is provided to give the public and interested parties an opportunity to submit comments regarding the potential environmental impacts of the proposed project. This information will be used to develop the scope and content of the proposed Environmental Impact Report (EIR) for the project to be described at this meeting. Please record your comments in the space provided below and submit this form to City staff at the conclusion of the meeting or you can mail to the address noted on the back of this form. Thank You.

Comments:

We need an alternative to having all the traffic going through University City on one road (Genesee) - where there are 3 schools on or near the intersection of Governor + Genesee. The Regents Road bridge has been in the City Plan prior to most of the residents purchasing their home. There is only 1 school near the planned Regents Road bridge area.

Name Liz + Scott Jones

Signature Liz Jones

Address 6109 Tamilynn St, San Diego 92122

Use back of sheet if additional space is necessary.



CITY OF SAN DIEGO

PLANNING DEPARTMENT
ENVIRONMENTAL ANALYSIS

PUBLIC SCOPING MEETING

University Community Plan Amendment / DECEMBER 16, 2015

This meeting is being held pursuant to the *California Public Resources Code Section 21083.9 et seq.*, and is provided to give the public and interested parties an opportunity to submit comments regarding the potential environmental impacts of the proposed project. This information will be used to develop the scope and content of the proposed Environmental Impact Report (EIR) for the project to be described at this meeting. Please record your comments in the space provided below and submit this form to City staff at the conclusion of the meeting or you can mail to the address noted on the back of this form. Thank You.

Comments: WILL EIR SHOW THE ACCIDENT RATE
IF THE BRIDGE GOES IN OR DOESNT GO
IN. COMPARE BOTH ACCIDENT RATE
CAN ENGINEERING STUDY DO AN
ACTUAL ASSESSMENT OF ACCIDENTS IF BRIDGE
GOES IN OR DOES NOT GO IN.
INCLUDE HOW TRAFFIC CONTROLS WILL BE
USED TO MAKE THE ASSESSMENT.

Name LOUIS RODRIGO Signature [Signature]
Address 5906 DIAC ST 92122
SAN DIEGO, CA

Use back of sheet if additional space is necessary.



CITY OF SAN DIEGO

PLANNING DEPARTMENT
ENVIRONMENTAL ANALYSIS
PUBLIC SCOPING MEETING

University Community Plan Amendment / DECEMBER 16, 2015

This meeting is being held pursuant to the *California Public Resources Code Section 21083.9 et seq.*, and is provided to give the public and interested parties an opportunity to submit comments regarding the potential environmental impacts of the proposed project. This information will be used to develop the scope and content of the proposed Environmental Impact Report (EIR) for the project to be described at this meeting. Please record your comments in the space provided below and submit this form to City staff at the conclusion of the meeting or you can mail to the address noted on the back of this form. Thank You.

Comments:

- 1) The Regents Road Bridge should be built.
- 2) In the EIR please consider showing the regional accident and mortality rate with or without the bridge. Also the full turn-around time from Ambulance launch to delivery to Hospital with various road scenarios.
- 3) Building just one of the two lane bridges as a; pedestrian, bike, emergency vehicle and conflagration exit would resolve 4 out of the 5 issues. Building the second set of two lanes could be determined by traffic volume and should be placed ahead of adding lanes to Genesee. However this method of construction would require double mobilization.
- 4) Consider placing the Governor to Gillman Road/Bridge back in the plan as a pedestrian, bike, emergency vehicle and conflagration route only. The more emergency options we have the better. This connection could consist of an industrial grass-crete which would look similar to the native vegetation/soil from an acute angle. Flanking the grass-crete could be a DG path for bikes and pedestrians. The bridge could have an area of refuge.
- 5) Consider incorporating Firehouse Location. If bridge is built Firehouse appears to be best placed in central UC near Swanson Pool.

Thank You

Name LOUIS RODOLICO Signature Louis Rodolico
Address 5906 DIRAC ST. SAN DIEGO, CA 92122

Use back of sheet if additional space is necessary.

December 24, 2015

Louis Rodolico
5906 Dirac Street
San Diego, CA 92122
858-999-5549

Susan Morrison, Environmental Planner, City
San Diego Planning Department,
1010 Second Avenue, MS 614C
San Diego, CA 92101

Re: INTERNAL ORDER No. 12002051/11003327
University Community Plan Amendment

Ms. Morrison

This document favors Regents Bridge & is continually updated with community comment, if you see anything out of line please let me know. In my estimation over the next century, building the bridge, will save the region about 1.25 billion dollars and results in ** 1,500 fewer traffic accidents involving property damage, injury and death. All this loss so about 1 1/2% of UC properties can gain a property value increase and or a more pristine view of the canyon, at the risk and expense of everyone else.

There is too much misinformation out there: houses will drop \$200,000 in value if the bridge is built, or the bridge will usher in a crime wave, or the bridge will destroy the canyon forever. This document tries to take a fresh look at Traffic, Safety & Fire issues. In Philadelphia I have served as a pro-bono community advocate for transportation projects in the 300 million dollar range.

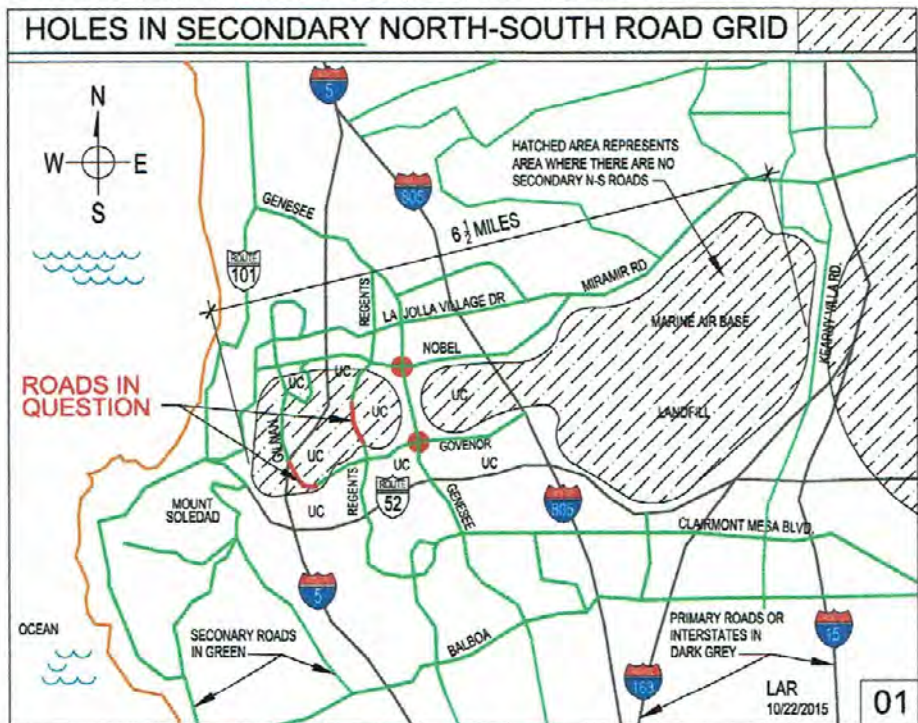
I like the work FORC has accomplished and would support management of construction that respects their work. Since greenery can remain under a high twin bridge the bridge(s) will occupy 1/3 of one percent of the 650 acre canyon. I see 80% to 90% of the canyon being off limits as a preserve. Pedestrians and bikers would still have access.

Below is slide ALT which shows what I consider to be an idyllic alternate to the canyon. Twin bridges allow sun to trace through. Even if the east bridge is built as a stand-alone bridge it would be sized for emergency trucks so it could become the north bound lanes in the future if it turns out that the coaster and other improvements were not enough to handle the increased traffic volume projected with additional development. I am scheduled to present this "burying the train alternative" to UCPG in January and hope to get their endorsement. Only once before did I lobby to move a train and at first allot of people in my community thought I should be put in a strait jacket. However over time they understood, the train was moved and a dangerous five point intersection mitigated. See also Page 5 Slide 4 for details including logic for the lake and cistern.



While driving my son to little league we were both witness to a middle school student being hit by a car and thrown onto the sidewalk like a ragdoll. We had been waiting in our car at the overburdened intersection of Governor and Genesee. Immediately adults came to the side of the child and were on their cell phones summoning assistance. The kid could barely sit up and was obviously disoriented. Also the neighbor of one of my co-workers was killed there on his bicycle in 2010.

Planning is a centuries old art, the number of houses and businesses in this area were planned around the completion of the Regents Road Bridge and the extension Governor Drive West to Gilman Drive. The Governor extension to Gillman has been taken out of the plan but global warming and the intensity of recent fires points to a fresh look at this decision.



Slide 01 to the left shows where there are no secondary or tertiary North-South roads. The Interstates are excluded since they become clogged with local rush-hour traffic. We can see from this slide why so much traffic is funneled thru Genesee, it has the Landfill and Marine Base to the East and two uncompleted roads to the West all placing additional North-South traffic load on Genesee.

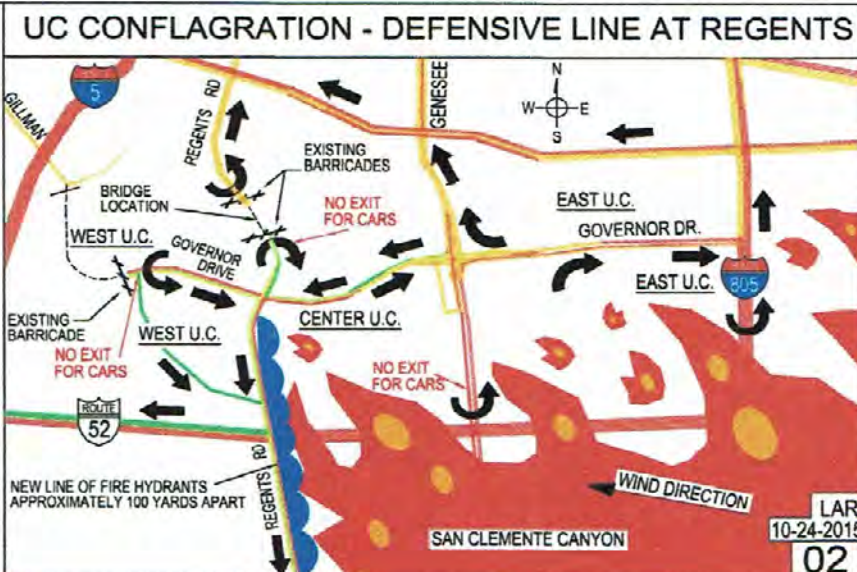
Governor to Gillman has already been taken out of the plan and now the Regents Road Bridge is in jeopardy. Failing to put them in gives us the congestion and unnecessarily high accident rate and poor emergency response times we have today.

Carving out a private enclave just west of Genesee puts additional compressed load on Genesee and raises the accident and mortality rate for the community at large.

Conflagration & Fire Storms

With Global Warming wildfires are an ever increasing problem. Many areas of this community currently have only one way out. It is sober safety practice to have multiple ways out. If there is another conflagration, like in 2003 & 2007, then most if not all the roads are more likely to become grid locked. East UC residents will be directed away from the Genesee gridlock and east into the conflagration. Ironically the west residents, who are fighting the construction projects, will receive the best route out. This puts emergency personnel in an impossible position. Instead of protecting persons and property their priority becomes traffic and the added difficulty of positioning emergency equipment. See illustration 02 below, in my opinion it looks like, the Fire Marshall has given up waiting for the Regents Road Bridge to be built and is implementing other strategies to safeguard the community.

The image to the right illustrates a new line of recently installed fire hydrants on Regents Road. The new line of hydrants will act as a fire barrier as a fire runs west through UC and the San Clemente Canyon. This is an effective way to keep Regents Road South open, for all of UC, during a conflagration. The new fire hydrant line will demand a lot of water and equipment, it will remain necessary until the Regents Road bridge is built. Once the bridge is built Regents Road will be an un-manned exit. The fire line, equipment and manpower can all move to 805 thereby protecting all of UC as well as San Clemente Canyon. Once again not building the Regents bridge pits UC neighborhoods against each other. West UC receives a higher level of fire protection with more time to exit the area and lower fire insurance rates. This feeds into the narrative that West UC is a privileged enclave and the center of political power in UC.

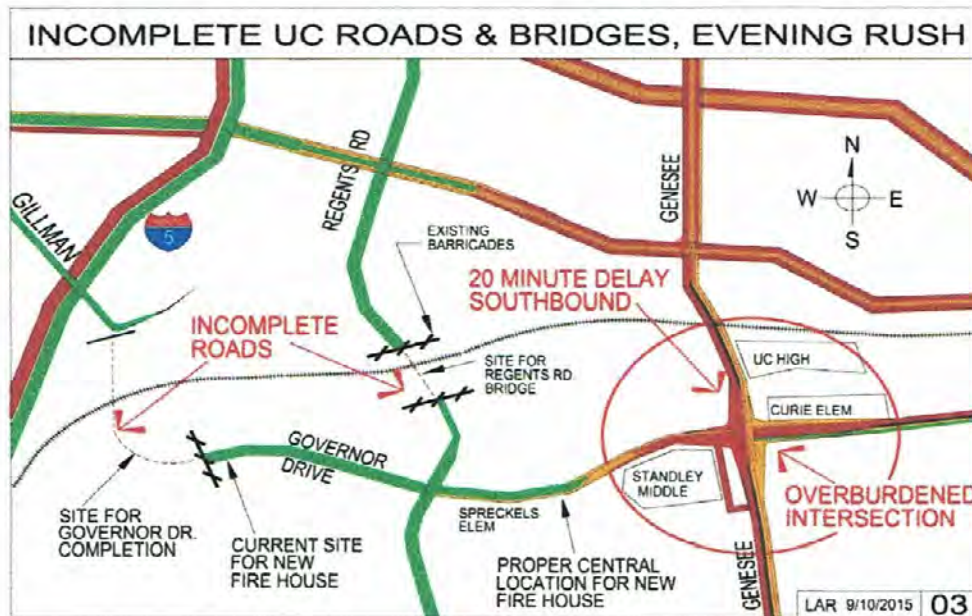


Emergency equipment availability and access is something insurance company underwriters recognize when determining fire insurance rates. Governor to Gillman provides an excellent escape route and a means to bring equipment in from the north. Any new bridges can also provide an area of refuge as shown in illustration 05. Getting the Ambulance to the Patient is only half of the battle, we still have an incomplete road system to get the Patient to the Hospital.

Loss of Life

Genesee/Governor intersection is very congested. There are three schools with 3,500 students at Genesee and Governor Intersection. By having all the Vehicular traffic meant to be shared by Governor West, Regents North and Genesee funneled thru Governor and Genesee there is greater overall risk for the community. The deaths and injuries are a matter of record. If the bridge is not built the next century will produce approximately **1,500 additional accidents involving property damage, injuries and deaths. This number excludes unreported accidents with no police report.

As a pedestrian and driver I can say, without fear of contradiction, that the Genesee/Governor Intersection is one of the most if not the most dangerous in our region. It's a disgrace that any community would hold itself and their school children in such low regard. Pedestrians need to be extremely careful when crossing this over-congested intersection even if they have the right of way. See illustration 03 below.



Unfortunately when there is a tragedy on the Genesee corridor those who do not want the Regents Road Bridge built find a way to blame the victims. As a community we need to recognize that failing to complete the Regents Road Bridge and Governor Drive to Gillman is the biggest part of the problem.

Actuarial Traffic Calculation:

If Genesee were to have a third of its traffic diverted to Regents Road the accident rate at Genesee would drop to 44% of the current rate. Using the probability of thirds the risk of accidents can be represented by: 1-1, 1-2, 1-3, 2-1, 2-2, 2-3, 3-1, 3-2, & 3-3. If 1&2 are assigned to Genesee the accident rate here drops to 4/9 or 44% of the current rate. Regents would have an accident rate determined by 3-3 so it would be 11% of the current Genesee rate. With Regents Bridge being built West UC will have less need for the Genesee /Governor intersection.

New Firehouse:

Our area has one of the slowest emergency response times. Currently rescue vehicles on Genesee are forced to head southbound on the north bound lanes during the evening rush hours of 3Pm to 7PM. Since we have not completed these road projects there is a plan for an additional, redundant firehouse. The proposed location is at Stresseman and Governor which is extreme West UC. This location will improve response times and lower the fire insurance rates for West UC but not the East. Benefits of the fire house radiate out from it, so to provide for all of UC it should be centrally located near the Standley Rec Center. See illustration 03 above. Once the bridge is built the new firehouse may not be necessary so it should be designed with a dual use in mind. See attached 12/24/2015 letter to Marti Emerald illustrating various scenarios.

If the property taxes in the east will go up the same rate as the west then the 2016 property tax ballot should consider a central location for the new Firehouse. New Firehouse cost 12 million plus maintenance and salaries at \$450,000 per year. Next century costs will be \$57 Million Dollars or the cost of the bridge.

New Market Shopping Center:

This shopping center at Regents and Governor was intended to be hooked into the North extension of Regents Road and have access to additional customers thru Gillman. Years ago this center, like others, paid for the roads to be built and they have struggled due to their incomplection.

Advocates who do not want the Regents Road Bridge built or Governor extended to Gillman will claim it is part of an "outdated plan". The "outdated plan" talking point has no specifics, how could the original plan be outdated if all the existing streets, buildings and infrastructure were designed and built with the intention of the Regents Road Bridge being built and Governor being extended to Gillman?

Traffic Man Hours:

Citizens sitting in idling vehicles represent a loss of productivity. It can take 20 minutes longer to get thru the Genesee-Governor intersection during the rush hours, 1/3 hour x 15,000 cars x 250 work days equals more than one million man hours wasted each year. At \$20 per hour average = \$20 million in lost wages each year. Building the bridge would cut these times in half or One Billion Dollars over the next century.

Gasoline & Pollution:

Idling cars consume about a gallon of gasoline an hour. So using the calculation above a million gallons of gasoline wasted each year. At \$3.50 per gallon=\$3.5 Million Dollars per year. Play these expenses out over time and the Regents Road Bridge and the Governor Drive Connection to Gillman could already have been built several times over. Thousands of idling cars and all the pollution associated with it. Are the groups opposed to the bridges concerned about the environment? Cutting drive times in half saves 175 Million Dollars** over the next century.

Where the Local Community Anger Comes From:

Advocates who do not want the Regents Road Bridge built have this talking point: "how can you wish that traffic and the danger it represents on "us" The "us" in their mind is West UC. The "them" is East of Genesee.

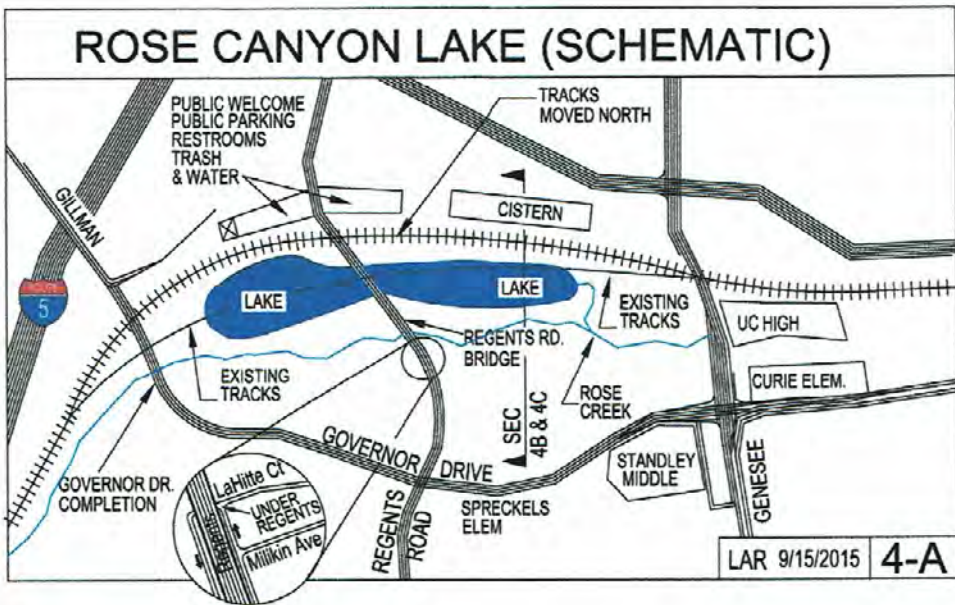
The East side of UC is not advocating danger on anyone, East UC wearily awaits the planners intended balance. The West UC statement sounds more like: "how can you wish that traffic and the danger it represents on us, we want to add another lane to Genesee so even more traffic volume and the danger it represents will go towards your end of the community, not our end at Regents Road, we want the privacy, safety, increased property values and advantages of a gated community, dedicated redundant fire houses and other city services at yours and the City's expense, we do not care about the East end of UC. We do not care that you will be forced to turn into the conflagration, we believe that the bridge will lower our property values, we are privileged and will not allow the bridge, the traffic it brings to our neighborhood, and other elements (crime) the bridge will bring."

It's devolved into a tale of two cities. In theory the extra lanes at Genesee are to be taken out of the plan but once all the road approaches have been eliminated at Regents the right of ways will still exist to add additional lanes at Genesee. They could be put back in the plan with the stroke of a pen.

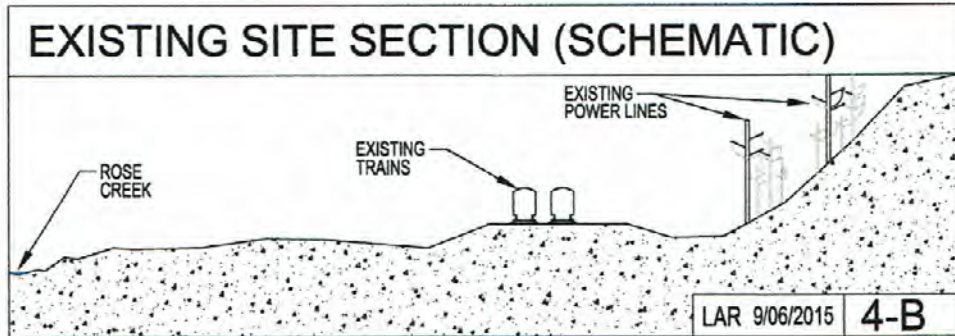
Developers had to hand over about 20 million dollars in the 60's to pay for these road improvements. These funds are currently being spent down. How much was spent needs to be explained. If Regents Road Bridge is off the plan, where does the money go then? So much has been spent to date and we lost a buy in with the trolley project, we should consider additional partners. We could also consider upgrading Rose Canyon much like San Clemente which welcomes the public with; parking, trash, bathrooms and water.

See Illustrations 4A, 4B & 4C page 5. A linear lake could get us buy in from Fire Agencies since they could have multiple helicopter's simultaneously drawing water in fire emergencies. The lake becomes a savior of life and property when humans are in tragedy. The water department could use the lake as a linear bio-filter. A ten acre lake with an average depth of 5 feet could bio-filter over 270,000 gallons a day with a 12 day cycle. These could be two good partners.

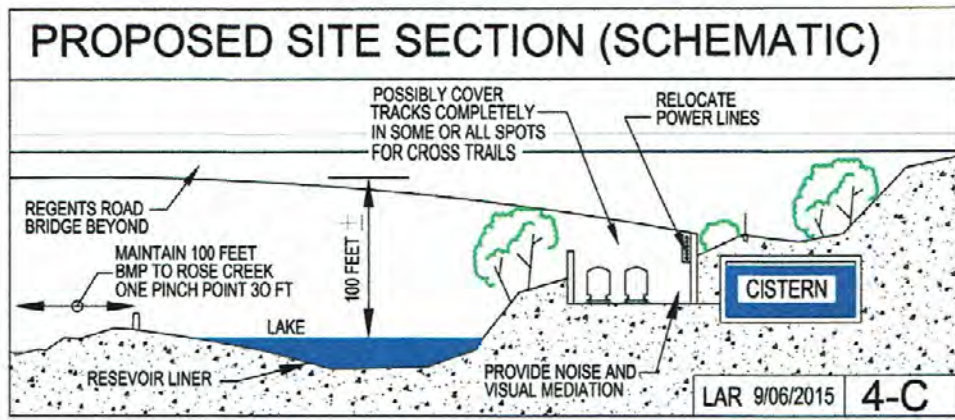
Both the construction of the Bridges and the digging for the lake will generate enough fill to limit earth being moved off site.



It would also be feasible to have a maintenance road next too or between the two tracks or place a trolley line underground next to the relocated tracks. We could then have a teardrop trolley loop that went underground somewhere in the vicinity of the UTC mall, remaining under Genesee heading south, cross underground west through Rose Canyon until it came out of the tunnel somewhere near Gillman. This might give us another partner to help with the project. Possibly trolley stops at UC High and Regents. UC high could have a bridge or tunnel for safe cross at Genesee. Regents could have a commuter parking lot.



All this would eventually be determined by an Engineering Review.



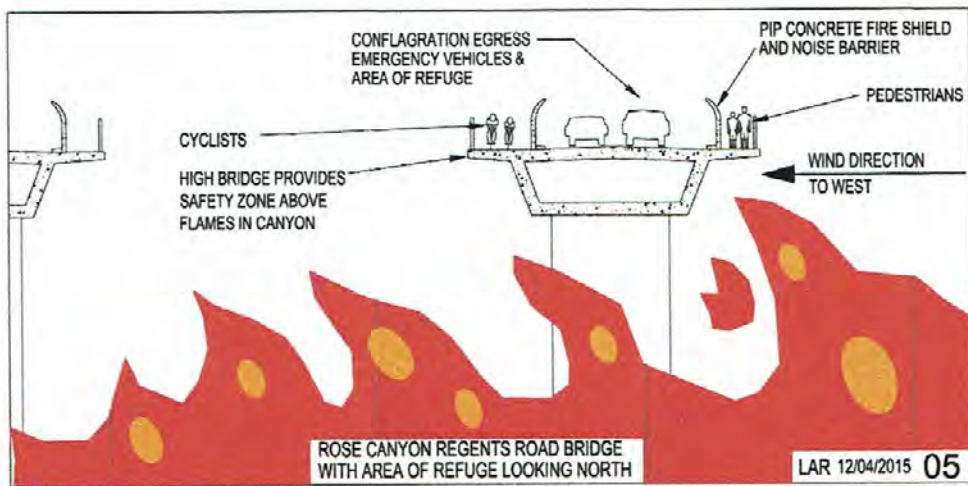
I will attempt to see if the UCPG, UCCA and the Friends of Rose Canyon will support burying the train and building the Regents Road Bridge.

See ALT Page 1

The Regents Road Bridge Site is public property. An elevated bridge is better for cyclists and will suffice to satisfy reasonable naturalist concerns, with substantially less interference than the existing belching, clanging & screaming 300 ton Iron Horse making its way through the canyon on a regular basis.

Where Governor will be extended to Gillman: With global warming, droughts and subsequent fires we should consider building this road as egress during a conflagration. More egress options equals better odds. This road is ideal for fire equipment positioning during a conflagration. Have been told how ridiculous it is to bring this up.

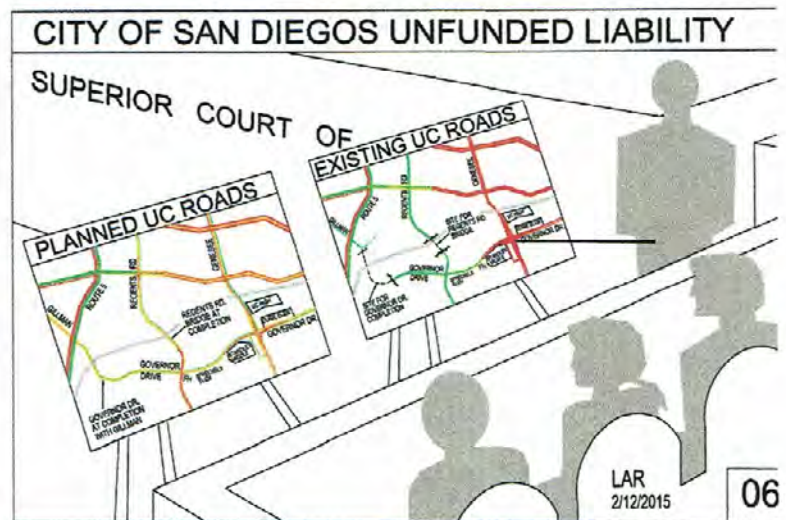
There are beautiful bridges spanning parks all over the world. Illustration 5 next page shows one bridge design that would act as an "area of refuge" during a conflagration.



It is easy to sympathize with public officials who can see that these projects need to be completed. The Fire Marshall has given up waiting for the community to build the bridge and is implementing other measures.

For now we just wait for the next inevitable tragedy on the Genesee Corridor and witness, once again, those who do not want the Regents Road built find a way to blame the victims even if they are students.

Hopefully there is public will and funds to improve Rose Canyon by; building the bridges, mitigating the train, possibly adding a body of water, provide public access, parking, water and bathrooms. I am hopeful that the community will come to its senses on this issue. Drivers should not have to circumvent the community, via interstate, to move within the community and they should not be directed by police to turn east into a conflagration in order to escape it. Not building the Bridge represents an unfunded liability for San Diego see illustration 06 at right. Also we certainly do not want it to come to a victims naming ceremony for the completed Regents Road Bridge.



Conclusions

- 1) The Regents Road Bridge should be built.
- 2) In the EIR please consider showing the accident and mortality rate with or without the bridge. Also the full turn-around time from Ambulance launch to delivery to Hospital with various road scenarios.
- 3) Building just one of the two lane bridges as a; pedestrian, bike, emergency vehicle and conflagration exit would resolve 4 out of the 5 issues. Building the second set of two lanes could be determined by traffic volume and should be placed ahead of adding lanes to Genesee. However this method of construction would require double mobilization.
- 4) Consider placing the Governor to Gillman Bridge back in the plan as a pedestrian, bike, emergency vehicle and conflagration route only. The more emergency options we have the better. This connection could consist of an industrial grasscrete which would look similar to the native vegetation/soil from an acute angle. Flanking the grasscrete could be a DG path for bikes and pedestrians. The bridge could have an area of refuge.

I recognize that this is an unusual planning method in a charged political environment as opposed to "poor planning". My apologies for this statement made by me on the 16th.

Thank You

Louis Rodolico

** These accident rates were extrapolated from the limited accident information available to a citizen.

December 24, 2015

Councilmember Marti Emerald
202 "C" Street, MS #10A
San Diego, CA 92101
Telephone: (619) 236-6699
Email: martiemerald@sandiego.gov
Re:2016 Ballot New Firehouses at University City
Scenarios for Emergency Response Times

Louis Rodolico
5906 Dirac Street
San Diego, CA 92122
858-999-5549

Ms. Emerald:

This letter supports the Regents Road Bridge and one not multiple new fire houses in University City.

Currently the 2016 Fire House Ballot vote is showing two additional Firehouses. This appears to assume that Regents Road Bridge will not be built. The two new Fire Stations are at Judicial and Nobel and at Governor & Stressmann. The issue is not only how long it takes the ambulance to get to your house but, in addition, what roads are in place to get the patient quickly to the hospital. The following scenarios all terminate at Campus Point Drive and Genesee and assume no traffic. Times were taken from Google Maps at 2:30 PM.

West Scenario #1) Nobel Fire Station to Central West UC would be 11 minutes add 7 minutes for triage & loading plus 10 minutes to Campus Point Drive and Genesee totaling; $11+7+10=28$ minutes.

West Scenario #2) Firehouse in West UC at Stressmann $2+7+10=19$ minutes****

West Scenario #3) Firehouse at Central UC near Swanson Pool if the Regents Bridge was built it would be $4+7+8$ or 19 minutes.****

East Scenario #1) Nobel to East UC would be $9+7+10=26$ minutes.

East Scenario #2) Firehouse at Central UC near Swanson Pool $5+7+10=22$ minutes****

****So the sweet spot is one fire station near Swanson Pool with the bridge. Central UC will have the best times by a minute or two. Stations costs 12 million and 2.2 million a year to operate. Removing one Fire station will save 232 million dollars over the next century or 58,000 per household, plus we all get better response times. If the Bridge is built West UC will have route options at I-5 and Regents, Central UC will have Regents and Genesee and East UC will have Genesee and 805. All parts of the community have more than one viable route option which will improve average response and delivery times.

If we placed one fire station near Swanson Pool on Governor Drive it would be centrally located so all UC would be within 2 miles of the new station. This is also the location the mobile response team currently uses.

Currently Fire Stations 35 & 27 are centrally located in order to be most effective. Adding two or three new locations is expensive. Our community would best be served with one central Fire Station. But some are calling for 3 not just 2 new facilities if the Regents Road Bridge is not built.

So should we not build the bridge along with building 2 or 3 new facilities in order to create a separate West UC enclave at an additional cost of 1.5 billion** over the next century? Or build the bridge and one central fire station at a cost of 300 million over the next century? The Bridge also eliminates 1,500 traffic accidents, involving injury and death over the next century. **See also letter I sent you 09/14/2015

What is your assessment of building the Regents Road Bridge and one central firehouse near Swanson Pool? I am asking as a taxpayer and a resident concerned about public safety.

Thank You



Louis Rodolico

CC Planning, Councilwoman Lightner

Dec, 8, 2015

Susan Morrison, Environmental Planner
City of San Diego Planning Department
1010 Second Ave.
MS 614C
San Diego, CA 92101

Subject: UNIVERSITY COMMUNITY PLAN AMENDMENT, pending 12002051/1003327

Dear Ms. Morrison:

This letter regards our deep concern that the Scoping meeting and comment period for the UC Plan Amendment NOP Meeting is scheduled on Dec. 16th, and response time is limited to 30 days starting Dec. 2nd. Your department must be aware that studying this document and writing an adequate response in the middle of the holidays, will be difficult, if not impossible for many people.

I request that you re-schedule the meeting after the first of the year and extend the comment period to 30 days following January 1st. Such a gesture of accommodation and understanding would be greatly appreciated during this Season of Goodwill. Thank you.

Sincerely yours,



Marcia and Robert Munn

6255 Radcliffe Drive
San Diego, CA 92122

858-453-4563

From: munnmc@earthlink.net
To: [PLN_PlanningCEQA](#)
Subject: UNIVERSITY COMMUNITY PLAN AMENDMENT
Date: Tuesday, December 08, 2015 2:44:10 PM

Dear Ms. Morrison:

This letter regards our deep concern that the NOP meeting for the UC Plan Amendment is scheduled for Dec.16th, and a 30-day public response period started Dec.2! Your department must be aware that studying this document and writing an adequate response in the middle of the holidays will be difficult, if not impossible, for many people.

We request that you re-schedule the meeting after the first of the year and extend the comment period to 30 days following January 1st. This gesture of accommodation and understanding would be greatly appreciated. Thank you.

Marcia and Robert Munn

6255 Radcliffe Drive
San Diego, CA 92122
858-453-4563

From: [margaret.jensen](#)
To: [PLN.PlanningCEQA](#)
Subject: University Community Plan Amendment
Date: Thursday, December 31, 2015 8:49:20 AM

Susan Morrison, Environmental Planner
City of San Diego Planning Department
1010 Second Ave. MS 614C
San Diego, CA 92101

Subject: University Community Amendment
Schedule No. Pending (Internal Order 12002051/11003327)

Dear Ms. Morrison,

Many aspects of the delay in building the Regents Road Bridge seem suspicious. The need for it is self-evident to many of us University Community residents, and to those who drive here to work. Please allow more time for concerned citizens to make our views known. To me, squeezing the comment period into the already crowded holiday season smacks of underhanded tactics.

Why is the Regents Road Bridge not yet built? How have they gotten away with all the new dense construction predicated on a bridge that is supposed to be built, but hasn't been? Are there NIMBYs in positions of influence? Where were they during those dangerous wildfires in 2003 and 2007? Do they have helicopters in their back yards, unlike those of us forced to use our cars to escape if necessary?

I don't know what is going on, but it seems to be ignoring basic safety issues.

Sincerely,
Margaret Jensen



CITY OF SAN DIEGO

PLANNING DEPARTMENT
ENVIRONMENTAL ANALYSIS

PUBLIC SCOPING MEETING

University Community Plan Amendment / DECEMBER 16, 2015

This meeting is being held pursuant to the *California Public Resources Code Section 21083.9 et seq.*, and is provided to give the public and interested parties an opportunity to submit comments regarding the potential environmental impacts of the proposed project. This information will be used to develop the scope and content of the proposed Environmental Impact Report (EIR) for the project to be described at this meeting. Please record your comments in the space provided below and submit this form to City staff at the conclusion of the meeting or you can mail to the address noted on the back of this form.

Thank You.

Comments:

It is very important for our planet to do all we can to preserve and improve it for those who come after us.
Increasing roads and bridges it is not a way to do this. Leaving more open space is.

Name MARIETTE KOBRAK Signature Mariette Kobrak
Address 3427 Tony Dr S.D. 92122

Use back of sheet if additional space is necessary.

From: [Stephens, Mark](#)
To: [Morrison, Susan](#)
Cc: [Kalkirtz, Victoria](#); [Thomsen, Douglas](#)
Subject: RE: NOP & Scoping Meeting Notice - University Community Plan Amendment
Date: Monday, December 28, 2015 3:51:43 PM
Attachments: [University Community Plan Amendment Draft EIR NOP Comments 12-28-15.docx](#)

Susan,

Hi! Attached are informal comments on the Notice of Preparation (NOP) for the City's University Plan Amendment Draft EIR. Took a bit different approach from some other reviews. Since most comments provided are usually directed at correcting outdated or erroneous information in draft environmental documents received, and a number of significant changes have occurred in the last few years or are expected to take effect in the next couple of months in the storm water world, tried to be more proactive here by furnishing a status overview and links to some of key current storm water related topics. The hope is consultants can focus on more current information versus documents that are in some cases 8 to 10 years old and no longer in effect. Also included a few comments made on other recent community plan EIR NOPs. Hope this is helpful. Please let me know of any questions. Thank you!

Best regards,

- Mark Stephens

Mark G. Stephens, AICP

Associate Planner
City of San Diego
Transportation & Storm Water Department
Storm Water Division
9370 Chesapeake Dr., Suite 100, MS 1900
San Diego, CA 92123-1024
(858) 541-4361
mgstephens@sandiego.gov

From: Morrison, Susan
Sent: Tuesday, December 01, 2015 2:18 PM
To: Herrmann, Myra <MHerrmann@sandiego.gov>; Morrison, Susan <SIMorrison@sandiego.gov>
Cc: Garcia, Melissa <MAGarcia@sandiego.gov>; Monroe, Daniel <DMMonroe@sandiego.gov>
Subject: NOP & Scoping Meeting Notice - University Community Plan Amendment

Hello Everyone,

Attached is the Notice of Preparation of an Environmental Impact Report and Scoping Meeting for the University Community Plan Amendment, which is being distributed tomorrow for a 30-day public review.

If you are staff to a City advisory board, committee or park council, please feel free to forward this email and attachment to your members.

Thanks,

Susan I. Morrison, AICP

Associate Planner

City of San Diego, Planning Department - Environmental

1010 2nd Avenue, MS 614C

San Diego, CA 92101

(619) 533-6492

SMorrison@sandiego.gov

**University Community Plan Amendment
Notice of Preparation - Draft Environmental Impact Report (#12002051)**

COMMENTS SUBMITTED BY CITY OF SAN DIEGO STORM WATER DIVISION
12/28/15

Since prior environmental documents may be used as a starting point in preparing this Draft Environmental Impact Report (DEIR), note the following updated information in addressing hydrology, water quality, and related storm water topics.

The most recent National Pollutant Discharge Elimination System (NPDES) Permit and waste discharge requirements for discharges from the Municipal Separate Storm Sewer Systems (MS4s) draining watersheds within the San Diego Region were adopted by the San Diego Regional Water Quality Control Board (Order No. R9-2013-0001, as amended by Order No. R9-2015-0001 and Order No. R9-2015-0100; NPDES No. CAS0109266). Copermittees subject to the permit include the County of San Diego, City of San Diego and the other 17 incorporated cities in the County, San Diego County Regional Airport Authority, and San Diego Unified Port District, and permit amendments have added Copermittees from portions of Orange County and Riverside County located within the San Diego Region. The current permit, as amended, can be accessed at:

http://www.waterboards.ca.gov/sandiego/water_issues/programs/stormwater/docs/2015-1118_AmendedOrder_R9-2013-0001_COMPLETE.pdf

The permit requires preparation of collaborative Water Quality Improvement Plans by watershed management area to guide the affected Copermittees' jurisdictional runoff management programs towards achieving improved water quality in MS4 discharges and receiving waters. The goal is to protect, preserve, enhance, and restore water quality and designated beneficial uses of waters of the state. This is to be accomplished through an adaptive planning and management process that identifies the highest priority water quality conditions within a watershed and implements strategies through the jurisdictional runoff management programs to achieve improvements in the quality of discharges from the MS4s and receiving waters. The City of San Diego was the lead in producing the Mission Bay and La Jolla Watershed Management Area Water Quality Improvement Plan (WQIP) and the Los Peñasquitos Watershed Management Area WQIP. While the University Community Plan Amendment focus is on the Regents Road Bridge and Genesee Avenue widening in the Mission Bay and La Jolla Watershed Management Area, it appears other changes could also be involved affecting the Los Peñasquitos Watershed Management Area. Thus, information is being provided for both watershed management areas. The most recent versions of these WQIPs can currently be accessed at:

http://www.waterboards.ca.gov/sandiego/water_issues/programs/stormwater/docs/REVISED_MBWMA_WQIP.pdf and

http://www.waterboards.ca.gov/sandiego/water_issues/programs/stormwater/docs/REVISED_LoSPenWMA_WQIP.pdf

Two adjacent Areas of Special Biological Significance (ASBS), now called the Scripps ASBS and the La Jolla ASBS, were created along the La Jolla area coast in 1974. The California Ocean Plan was amended in 1983 to prohibit waste discharge into an ASBS.

The Los Peñasquitos Lagoon Sediment Total Maximum Daily Load (TMDL) is the first "third party stakeholder driven" TMDL adopted in the San Diego Region. The San Diego Regional Water Quality Control Board adopted Resolution No. R9-2012-0033, an amendment incorporating the Los Peñasquitos Lagoon Sediment TMDL into the San Diego Basin Plan on June 13, 2012. This TMDL Basin Plan Amendment was approved by the State Water Resources Control Board on January 21, 2014, and by the Office of Administrative Law (OAL) on July 14, 2014. The United States Environmental Protection Agency (USEPA) approved the TMDL Basin Plan Amendment on October 30, 2014. The final public documents for the adopted TMDL can be accessed at:

http://www.waterboards.ca.gov/sandiego/water_issues/programs/tmdls/los_peñasquitos_lagoon.shtml#PD

The City of San Diego Jurisdictional Runoff Management Plan (JRMP) adopted by the City Council on June 16, 2015 encompasses City-wide programs and activities designed to prevent and reduce storm water pollution within City boundaries. This plan supersedes the prior City Jurisdictional Urban Runoff Management Plan (JURMP), which is no longer in effect. The 2015 JRMP can be accessed at:

<http://www.sandiego.gov/stormwater/plansreports/jurmp.shtml>

The City Storm Water Division completed a Watershed Asset Management Plan (WAMP) in 2013. It covers each of the six watershed management areas located at least partially within the City, including the Mission Bay and La Jolla Watershed area that contains locations focused upon in this Draft EIR scope, as well as the Los Peñasquitos Watershed area encompassing the northern part of the community. Since the 2013 plan was prepared, it has continued to be refined and updated. The July 2013 Watershed Asset Management Plan is accessible at:

<http://www.sandiego.gov/stormwater/pdf/wamp2013.pdf>

Updated City Storm Water Standards are scheduled for City Council action in early February 2016. Regional MS4 Permit requirements for regulating post-construction storm water discharges on-site are addressed in: Part 1 – Best Management Practices (BMP) Design Manual for Permanent Site Design, Storm Water Treatment, and Hydromodification Management; Regional MS4 Permit and Construction General Permit requirements for regulating construction-phase storm water discharges are addressed in: Part 2 – Construction BMP Standards; and new

Regional MS4 Permit provisions to address post-construction storm water discharges through alternative means off-site are addressed in: Part 3 – Alternative Compliance Program. The Storm Water Standards Manual August 2015 draft is accessible at:

<http://www.sandiego.gov/stormwater/pdf/citysdstormwaterstandardsmanualdraft2015.pdf>

An updated City Storm Water Management and Discharge Control Ordinance adopted to comply with current MS4 Permit provisions took effect August 15, 2015. Refer to §43.0301 et seq. of the San Diego Municipal Code at:

<http://docs.sandiego.gov/municode/MuniCodeChapter04/Ch04Art03Division03.pdf>

Storm water infrastructure is sometimes addressed under the “Public Utilities” heading in community plan program EIRs. This does not appear to be the case for this EIR. If not, assure that any potential effects on storm water infrastructure, including capacity, operations and maintenance, are addressed. The information can be provided under the “Hydrology/Water Quality” heading, as long as the topic is addressed.

Incorporate Storm Water Standards Manual compliant Low Impact Development (LID) features into site design on public and private properties as required for development per the most current Municipal Separate Storm Sewer System (MS4) Permit.

Consider using permeable surfaces to repave public areas and public/private parking lots.

Consider opportunities for installing treatment control Best Management Practices (BMPs) into recreational facilities such as parks.

Installation of LID features should not conflict with street tree placement.

Any street redesign/retrofit should allow adequate clearance for street sweeping operations.

From: [Mary](#)
To: [PLN PlanningCEQA](#)
Subject: I object to the timing of this meeting. With the holidays it is in bad taste. Please extend this. I have been a resident for 43 years & we deserve more time
Date: Saturday, January 02, 2016 3:07:44 PM

Sent from my iPhone. Mary Ann

From: [Mary Beth Zopatti](#)
To: [PLN PlanningCEQA](#)
Subject: UNIVERSITY COMMUNITY PLAN AMENDMENT pending (Internal Order 12002051/11003327)
Date: Saturday, December 05, 2015 4:15:52 PM

Please keep the Regents Road Bridge in the University Community Plan. The NOP and Scoping meeting are at a busy time of year. I am asking that you extend the deadline to January 31, 2016.

Thank you,

Mary Beth Zopatti

From: [Mary Croft](#)
To: [PLN PlanningCEQA](#)
Subject: UNIVERSITY COMMUNITY PLAN AMENDMENT Schedule No.: Pending (Internal Order 12002051/11003327).
Date: Sunday, December 06, 2015 8:20:13 AM

I have just received information about the NOP and Scoping meeting scheduled for December 16th between 6 and 8 pm. I feel that the timing of this meeting could not come at a worse time of year. I for one am very interested in the Regents Rd. bridge construction issue and I will not even be in town that evening. I am sure that there are many others whose lives at this time are consumed with holiday commitments. I would like to have an explanation about why this date was selected and why a date early in the new year could not be set when there can be more input from interested parties.

I am also concerned that the comment period is limited to the busiest time of year for families. I feel strongly that the comment period should last through the end of January. Please give a plausible reason why January 1st is the cut off date, and why a 30 day extension is not possible.

I await your earliest response to my questions.

Thank you.

Mary Croft
5421 Bothe Ave.,
92122-4019
marycroft325@gmail.com
858-453-6955



CITY OF SAN DIEGO

PLANNING DEPARTMENT
ENVIRONMENTAL ANALYSIS

PUBLIC SCOPING MEETING

University Community Plan Amendment / DECEMBER 16, 2015

This meeting is being held pursuant to the *California Public Resources Code Section 21083.9 et seq.*, and is provided to give the public and interested parties an opportunity to submit comments regarding the potential environmental impacts of the proposed project. This information will be used to develop the scope and content of the proposed Environmental Impact Report (EIR) for the project to be described at this meeting. Please record your comments in the space provided below and submit this form to City staff at the conclusion of the meeting or you can mail to the address noted on the back of this form. Thank You.

Comments:

As a resident at Renaissance for 23 years, I have seen the 805 become a parking lot along with Genesee. There is no alternative streets if there is an accident on 805 —

This bridge has been in the City Plan for over 30 years until wealthy "Not in my back yard" obstructors succeeded in swaying our major Faulkner to abandon the people.

3 Fire Stations, what does that have to do with the price of tea in China?

The canyon is not paved — only a bridge over it — no environmental impact —

Name Mary Kersting Signature Mary Kersting

Address 5544 Renaissance Ave #107 apt.

Use back of sheet if additional space is necessary.

From: [A and M W](#)
To: [PLN PlanningCEQA](#)
Subject: University Community Plan Amendment
Date: Wednesday, December 02, 2015 9:28:05 AM

Hi,

I support the idea to remove the proposed Regents Road/Rose Canyon Bridge from the University City Community Plan.

If the bridge was to be constructed, it would just lead to more traffic driving THROUGH University City.

Please remove the bridge proposal via the subj document.

Thank you,
Matt Wuest
6918 Haworth St
92122
858 623-9858



CITY OF SAN DIEGO

PLANNING DEPARTMENT
ENVIRONMENTAL ANALYSIS

PUBLIC SCOPING MEETING

University Community Plan Amendment / DECEMBER 16, 2015

This meeting is being held pursuant to the *California Public Resources Code Section 21083.9 et seq.*, and is provided to give the public and interested parties an opportunity to submit comments regarding the potential environmental impacts of the proposed project. This information will be used to develop the scope and content of the proposed Environmental Impact Report (EIR) for the project to be described at this meeting. Please record your comments in the space provided below and submit this form to City staff at the conclusion of the meeting or you can mail to the address noted on the back of this form. Thank You.

Comments: Great plan! This will be great for furthering the Climate Action Plan, and for Environmental Impact. Impacts on environment: Air Quality, Noise, Light Pollution, Impacts on flora + fauna in canyon. # Impacts on neighboring homes + on streets, esp. La Jolla
Impact on Tecate Canyon and extra traffic added onto 52 at Regents + Genessee, with increased pollution from cars waiting to enter 52.
Impact on school children at Doyle, UC High,
Impact on entire Rose Creek Watershed, MSCPA

Name Meagan Beale

Signature MJ Beale

Address 3256 Willard St

~~Meagan Beale~~

Use back of sheet if additional space is necessary.

From: [Megan Bryden](#)
To: [PLN_PlanningCEQA](#)
Cc: [Councilmember Sherri Lightner](#)
Subject: University Community Plan Amendment; Internal Order #12002051/11003327
Date: Thursday, December 03, 2015 10:01:13 AM

Attn: Susan Morrison, City of San Diego Planning Department

Hello Ms. Morrison,

As a resident of University City I am writing to share my comments regarding the upcoming Environmental Impact Report for the University Community Plan Amendment.

I am in favor of **removing** the Genesee Avenue widening and Regents Road Bridge projects from the University Community Plan (UCP).

I feel Rose Canyon will be negatively impacted by the addition of a Regents Road Bridge and/or by the widening of Genesee Avenue. More importantly I do not believe either change will have a positive impact on peak traffic congestion. Most vehicles traveling along Genesee Avenue during peak traffic times are not going to our community, they are passing through and using Genesee Avenue as a freeway bypass. Adding surface street capacity will only cause more cars to leave the freeway and travel through our neighborhood. This will increase traffic, noise, and pollution near our homes, schools, parks, and open spaces without improving neighborhood traffic congestion.

Thank you for taking the time to consider my comments.

Megan Bryden
6053 Cozzens Street

-

Susan Morrison, Environmental Planner,
City of San Diego Planning Department,
1010 Second Ave., MS 614C,
San Diego, CA 92101
Via email: PlanningCEQA@sandiego.gov

Date: December 16, 2015

Subject: UNIVERSITY COMMUNITY PLAN AMENDMENT, Schedule No.: Pending (Internal Order 12002051/11003327).

Dear Ms. Morrison,

I am writing with regard to the Notice of Preparation (NOP) for the proposed University Community Plan Amendment. I object to the inadequate public notification of the NOP and the inadequate level of information in the "Scope of Work" that accompanies it. Not only does the review period for the NOP span Hanukkah, Christmas, and New Year, the content of the "Scope of Work" is completely generic and offers no relevant information for the public to comment on.

While the City may have met the letter of the law (CEQA) in its noticing for the NOP, clearly the spirit of the law has not been met. The Proposed Project is the elimination of two significant and long-planned transportation projects. These projects have been included in City plans for decades, and their removal warrants a robust public discussion.

I sent two emails to Council Member Lightner's office over the past year specifically on the topic of the Regents Road Bridge (only one of which was replied to). Although I had anticipated that Ms. Lightner would forward my name and email address to the Planning Department, however, I never received the NOP notice (email or otherwise) from the City. A simple email to all people who had expressed an interest in the topic would have demonstrated that the City is committed to community involvement for an issue as important as changing a Community Plan.

It appears that the NOP only appeared in an on-line version of the Daily Transcript newspaper, and not a print publication such as the UT. Similarly, it appears that copies of the NOP/Scope of Work were not placed in the two University City libraries that are frequented by community members of all ages and backgrounds, including the elderly who are less likely to receive information on-line.

In addition, notices that appeared in the University City Newsletter (<http://www.universitycitynews.org/2015/12/12/december-16-eir-scoping-traffic-study-meeting/>) and on the "Nextdoor" website are incorrectly stated. The meeting is described as an "EIR Scoping (traffic study) meeting," however the topic should have been identified as the University Community Plan Amendment. The reference to a traffic study is confusing as there is no traffic study made available for review or comment. The notices also incorrectly refer to the NOP as "The City's initial E.I.R. (Environmental Impact Report)." There is no such thing as an Initial EIR. There is an Initial Study, which was not completed as part of the current NOP, and a Draft EIR, which has to yet been prepared.

It is common CEQA practice to attach an "Initial Study" to an NOP. An Initial Study, a preliminary assessment of the project as defined in CEQA, is used to focus an EIR on the significant effects of a project, identify nonsignificant effects, and explain the reasons for determining why potential environmental effects would not be significant. By avoiding the preparation of an IS to accompany the NOP, the City has denied University City residents the opportunity for meaningful input regarding issues that should be addressed in the EIR for both the proposed Amendment and the Alternatives.

However, instead of completing an Initial Study to accompany the NOP, the City has chosen to issue a general purpose "Scope of Work" letter. While the letter states "The purpose of this letter is to identify the specific issues to be addressed in the EIR", the reality is that the content is completely generic and there is no substantive information about potential impacts that are specific to the proposed Plan Amendment. The letter is a template within which the words "University Plan Amendment" have been inserted into a pre-established text. The residents of University City deserve better.

Furthermore, the "Scope of Work" states "A traffic technical study shall be prepared in accordance with the City's Traffic Impact Study Guidelines, be approved by City staff, and included as an appendix to the EIR." However, the community has been told by Council Member Lightner's office that the traffic study was prepared over a year ago. I have asked the Council Member for a link to the traffic study several times in the past, to no avail. Also, I don't see it attached to the NOP, or even referenced in the NOP. Why hasn't the Traffic Study been made broadly available to the public, at least electronically on the City's website? Apparently some members of the community have seen the study, and questioned its lack of full scope. I am confused – what was the process for determining the scope of the traffic study, who prepared it, who funded it, and how can I view it? Were all of the alternatives analyzed? Will additional technical analysis be done for the EIR?

My preliminary comments on the scope of the EIR include:

- The EIR must include a detailed evaluation of the alternatives so that a fair comparison can be made between the Alternatives and the Proposed Project. For example, if any of the Alternatives are implemented, mitigation of significant effects to the environment would be required. What would these mitigation measures likely include? What benefits could be realized through these measures that would not be realized under the Proposed Project? This is critical information for the deliberative and decision-making process. (For example, if the Regents Road Bridge is not constructed, what improvements to Rose Canyon would not be required as mitigation that would be required under the Alternatives?)
- How are existing conditions being characterized? The EIR must include a description of the physical environmental conditions at time the NOP is published or, if there is no NOP, when environmental analysis is commenced. Did the environmental analysis commence when the Traffic Study was completed?

Finally, initiating a 30-day review period at the beginning of December is almost unheard of. If it was necessary to hold a review period during the holidays, an appropriate time extension into the new year

is imperative. My understanding is that the "rush" to accomplish the plan amendment is because Council Member Lightner wants the process to be completed before the November 2016 election. Ms. Lightner has been in office for 7 years, and now seeks to abbreviate the democratic public participation process for a major change to a Community Plan in favor of rushing the public participation process to ensure that the amendment is accomplished on her watch and becomes her legacy. The residents of University City deserve better.

The City is of the view that it is reasonable to expect its residents to review and comment on the NOP during the busiest season of the year. I would counter-propose that the City take this holiday season to prepare a proper Initial Study to substitute for the wholly inadequate "Scope of Work" currently attached to the NOP. The IS/NOP could be reissued at the beginning of January, kicking off a new 30-day review period in order to ensure adequate notice and meaningful public input.

The City is proceeding in a manner which seems to be intended to inhibit public comment, rush the preparation of the EIR, and accomplish a foregone conclusion of removing the Regents Road Bridge from the Community Plan as a legacy of the sitting Council Member. I humbly request that the City re-evaluate its methods and consider the following specific requests:

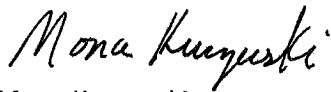
- Reissue the NOP with an IS instead of a generic "Scope of Work" for a full 30-day review period beginning in January.

- Include a robust analyses of the alternatives at a level of detail that allows for a fair comparison of the Proposed Project and the No Project and other Alternatives.

- Please include me (and every resident that submits a written response to the NOP or provides comments at the Scoping Meeting) on the distribution list for all future City public notices regarding the NOP and EIR.

Thank you for your consideration.

Sincerely,



Mona Kuczenski

**CITY OF SAN DIEGO
MEMORANDUM**

DATE: July 23, 2003

TO: Honorable Mayor and City Council

FROM: P. Lamont Ewell, Assistant City Manager

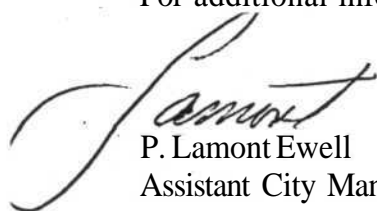
SUBJECT: 2002 MSCP Annual Public Workshop - Summary Report

The attached Summary Report on the Multiple Species Conservation Program (MSCP) is provided for your information.

Section 14.2 of the MSCP Implementing Agreement requires the City to prepare and submit to the U.S. Fish and Wildlife Service and the California Department of Fish and Game, a public report containing an annual account of the habitat lost and conserved within the City's MSCP Subarea during the previous year. The Cities of San Diego, Chula Vista and Poway, the County of San Diego, and wildlife agencies are also required to jointly conduct a public workshop to disseminate and discuss the annual report.

On August 7, 2003 the MSCP Annual Public Workshop will be held at the Lakeside Community Center, 9841 Vine Street, Lakeside, from 6:00 p.m. to 9:00 p.m. Staff from the Cities of San Diego, Chula Vista and Poway, the County of San Diego, and the wildlife agencies will conduct PowerPoint presentations on MSCP implementation activities for their respective agencies. There will be a question and answer period immediately following staff presentations.

For additional information please contact Keith Greer at (619) 236-7258.



P. Lamont Ewell
Assistant City Manager

PLE:KAG:ja

Attachment

cc: Michael Uberuaga, City Manager
S. Gail Goldberg, Planning Director
Ellen Oppenheim, Park and Recreation Department Director
Ann Hix, Open Space Division Deputy Director
Keith Greer, Deputy Director, Planning Department
Tom Story, Senior Policy Advisor to Mayor Dick Murphy
Planning Commissioners

2003 MSCP Annual Public Workshop - Summary Report

BACKGROUND:

On March 18, 1997, the San Diego City Council unanimously adopted the Multiple Species Conservation Program (MSCP). The U.S. Fish and Wildlife Service (FWS) and the California Department of Fish and Game (CDFG), collectively referred to as the wildlife agencies, entered into an Implementing Agreement (I.A.) with the City in July 1997. The I.A. requires the City to prepare a report containing an annual account of the habitat acreage lost and conserved within the City's MSCP Subarea. In addition, the City and the wildlife agencies are required to jointly conduct a public workshop to disseminate and discuss the annual report.

The City's sixth MSCP Annual Report was submitted to the wildlife agencies on February 19, 2003. The report identifies, by project, the habitat loss and conservation from January 1, 2002 through the end of the 2002 calendar year.

In 2002, habitat conservation efforts within the City's MSCP preserve area, referred to as the Multi-Habitat Planning Area (MHPA), were focused on acquiring critical areas of sensitive habitat and securing wildlife corridors within the MHPA, as well as initiating monitoring efforts. Acquisitions have been accomplished through public purchase and by directing private mitigation to parcels within the MHPA. The City and wildlife agencies have also acquired habitat within the MHPA with state and federal funding. The City is continuing to increase its efforts for the restoration, monitoring and management of habitat within the MHPA as described below.

ANNUAL REPORT SUMMARY:

Within the reporting period (January 1, 2002 - December 31, 2002), 407.1 acres of habitat were conserved in the MHPA and 103.2 acres were conserved adjacent to the MHPA, compared to the loss of 65.4 acres of habitat inside the MHPA. Outside the MHPA, 463.1 acres of habitat loss occurred (88 percent of the total habitat lost). Habitat loss represents the acreage impacted by projects approved for construction within the reporting period.

As of the end of the 2002 reporting period (December 31, 2002), a total of 32,659.7 acres have been conserved in (31,443.5 acres) or adjacent to (1216.2 acres) the MHPA. This includes pre-MSCP (baseline) conserved lands totaling 22,141 acres.

The habitat loss and conservation for the 2002 annual reporting period is summarized as follows:

TABLE 1 - 2002 HABITAT LOSS AND CONSERVATION
(January 1, 2002 - December 31, 2002)

Habitat Type & Examples of Habitats	Habitat Loss (acres)		Habitat Conserved (acres)	
	2002	Cumulative	2002	Cumulative
Wetlands: Coastal Wetlands(Salt Pan/Salt Marsh) Riparian Habitats Freshwater Marsh Natural Flood Channel Disturbed Wetland Vernal Pools Marine Habitats(Pacific Ocean/Deep Bay) Eelgrass Beds (Shallow Bays) Open Water	0.3	47.5	6.5	4845.7
TIER I (rare uplands): Southern Fore dunes Torrey Pines Forest Southern Coastal Bluff Scrub Maritime Succulent Scrub Southern Maritime Chaparral Native Grassland Oak Woodlands	58	310.5	99.9	2061.2
TIER II (uncommon uplands): Coastal Sage Scrub CSS/Chaparral	63.5	944.2	112.5	11520.5
TIER III A (common uplands): Mixed Chaparral Chamise Chaparral	124.9	499.7	218.3	6988.4
TIER III B (common uplands): Nonnative Grasslands	114.6	2319.8	24.3	3211.9
TIER IV (other uplands) Disturbed Agriculture Eucalyptus	127.4	1223.4	33.7	3062.2
Others: Beach Urban/Developed	39.8	816.5	15.1	969.7
Total	528.5	6161.5	510.3	32659.7

Note: Includes land inside and outside of MHPA.

The acreages in the table were generated by a geographic information system, which tracks habitat loss and gain. This system, Habitrak, uses the regional GIS (SANGIS) land base in its area calculations. This is the fourth year that the Habitrak system has been used to compile the habitat loss/gain information and maps for the annual report. Habitrak was developed to facilitate and standardize the annual reports for each jurisdiction that participates in the MSCP. Funding for the software development was provided by a grant from the California Department of Fish and Game and was administered by SANDAG.

PUBLIC LAND ACQUISITIONS:

In April 2000, the City Council Rules Committee approved the City priorities for MSCP land acquisition projects. Four areas totaling 4,181 acres were identified:

- Montana Mirador
- Del Mar Mesa
- East Elliott
- Otay Mesa

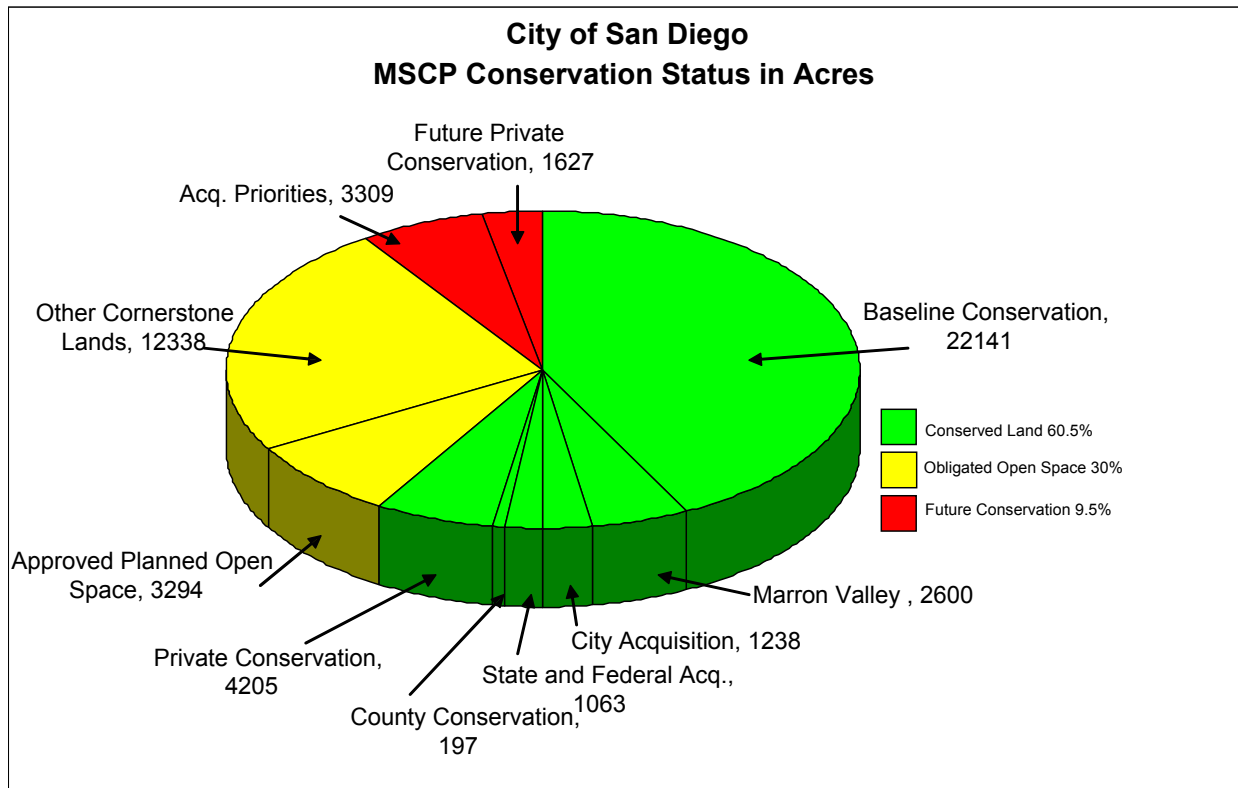
The San Diego River was added as an additional priority acquisition area in the winter of 2001.

In April 2001, the City completed the acquisition of the 538-acre Montana Mirador parcel located within the Rancho Peñasquitos community planning area. In September 2002, the City of San Diego, in partnership with the state Wildlife Conservation Board, the California Transportation Commission and the U.S. Fish and Wildlife Service, acquired three parcels totaling 56 acres located within the Del Mar Mesa area. This four-way joint acquisition provides for additional protection of scrub oak chaparral and vernal pools. In February 2003, the City acquired four additional parcels totaling 13.1 acres. Three private properties are proposing land exchanges on mitigation banks. The four remaining private property owners within the Del Mar Mesa acquisition area have rejected any offer of purchase.

In February 2003, the State Wildlife Conservation Board awarded the City a \$5 million grant for acquisition of private property in the East Elliott acquisition area. To date, 80 parcels have been appraised. Twenty offers have been made; 2 parcels (27 acres) have been acquired. Four parcels are in escrow and those remaining have not responded or have rejected the offer. Additional offers are on-going.

In addition to acquisitions made by the City, 210 acres have been conserved by Allied Landfill (115.35) and the Poway Unified School District (94.75) as mitigation. Finally, 266 acres of Fortuna Mountain were granted to the City by San Diego State University helping to conserve additional land in Mission Trails Regional Park.

On September 6, 2002, Governor Davis signed into law AB 2156 (Kehoe) creating the San Diego River Conservancy. The Conservancy will implement a vision for the river starting at the headwaters near the town of Julian, west 52 miles through Mission Valley into the Pacific at Ocean Beach. The Governor allocated \$12 million for conservation and preservation along the river.



Acquisitions on East Elliott, Otay Mesa and the San Diego River are expected to continue through this next year due to state and federal grants.

PROJECT REVIEWS:

In 2002, 161 new development projects were reviewed by the MSCP staff for consistency with the adopted MSCP Subarea Plan and implementing regulations. Since January 2003, an additional 77 new development projects have been reviewed. City staff continues to ensure that the MHPA preserve design, land use adjacency guidelines, mitigation requirements and specific area management directives have been evaluated and, as appropriate, incorporated into project designs. Projects that comply with the policies of the MSCP are afforded “Third Party Beneficiary” status as provided for in the City’s MSCP Implementing Agreement (Section 17.1).

Adjustments to the boundary of the MHPA are allowed on a project-by-project basis if the boundary adjustment is deemed functionally equivalent to the land that is proposed to be removed from the MHPA (see Section 5.4.2 MSCP Plan, August 1998). The wildlife agencies must concur with the adjustment. This year, MSCP staff has continued to have bimonthly meetings with wildlife agency staff to discuss proposed MHPA boundary line adjustments and to obtain concurrence from the wildlife agencies during the preparation of the environmental documents for the boundary line adjustment. After each meeting, MSCP staff confirm in writing the determinations made by wildlife agency staff.

GRANTS:

Grant funding is a key component to the successful implementation of the MSCP Subarea Plan. Below is a summary of current grant projects. In 2002 and 2003, the City of San Diego has secured \$5,400,332 in grant funding for acquisition, management and monitoring of lands within the MSCP.

Table 2 - 2002/2003 GRANTS

GRANT TYPE	GRANTOR	2002	2003
Natural Communities Conservation Planning (NCCP)	California Department of Fish and Game	Awarded two grants for MSCP management activities.	
Section 6 Planning Grant	U.S. Fish and Wildlife Service	Awarded grants for development of a vernal pool management plan within the City of San Diego and for functional assessments and wetland delineations in the Otay River Valley and Los Penasquitos watersheds.	
Wildlife Conservation Board (Proposition 12, 2000)	State of California Wildlife Conservation Board	Awarded \$5 million grant to acquire land in East Elliott.	
Environmental Conservation Foundation Grant	Environmental Conservation Foundation		Awarded grant for completion of the Carmel Mountain and Del Mar Mesa Preserve Management Plan.
Total:		\$ 5,308,283	\$92,049

MANAGEMENT ACTIVITIES:

In accordance with the City's Implementing Agreement (I.A.), Section 10.6B, the City was obligated to prepare a Framework Management Plan within six months after the adoption of the MSCP Subarea Plan. The City's MSCP Subarea Plan was adopted by the City Council in March 1997. A Framework Management Plan was included as Section 1.5 of the Subarea Plan; therefore, the City has fulfilled their obligations pursuant to Section 10.6B of the I.A.

As part of the fiscal year 2003 budget, the City Council established a new Open Space Division in Park and Recreation. This newly formed division has taken on the task of managing the

City's existing open space system, including lands acquired under the Multiple Species Conservation Program. Park and Recreation has hired a Senior Planner to serve as the Urban Canyon Coordinator. This position is a liaison between the Open Space Division and the various departments working in the canyons on water and sewer projects.

Until a regional funding source is in place, management for biological resources has been focused on maintaining the existing biological values of the habitat land under City control. Opportunities for specific biological management activities have been pursued when local or grant funding could be obtained.

The following (Area-Specific) Management Plans are completed or underway:

Table 3

AREA SPECIFIC MANAGEMENT PLANS

LOCATION	ACTIVITY	STATUS
Mission Trails Regional Park	San Diego Ambrosia Plan: Funded by a NCCP grant, this project identifies the distribution and management recommendations for San Diego Ambrosia within Mission Trails Regional Park.	The Final Plan was adopted by the Mission Trails Taskforce on May 15, 2000.
Pacific Highlands Ranch	City Council approved preparation of a 2,400 acre management plan in July 1999.	Master Revegetation Plan for the entire Pacific Highlands Ranch Subarea was completed in October 2000.
Rancho Encantada, a 1,500 acre parcel located adjacent to Sycamore County Park	Under the direction of the City, McMillian Development Company prepared a management plan for this property.	The development project plans, including final habitat management plan, obtained Council approval in 2001.
Marron Valley Management Plan	City of San Diego Water Department provided \$87,186 to prepare a management plan for the 2,600 acre Marron Valley Cornerstone Mitigation Bank.	The management plan was completed in June 2001.
San Pasqual/Lake Hodges Cornerstone	Funded by an NCCP grant, the City of San Diego Planning and Water Departments developed a management plan for the San Pasqual and Lake Hodges Cornerstone banks which includes vegetation mapping, rare plant surveys, wildlife habitat assessments, and evaluations of recreation potential and enhancement opportunities.	Biological surveys began in Spring 2002. The management plan was completed in July 2003.
Western Otay River Valley Management Plan	Funded by a NCCP grant and a \$68,490 match from the City of San Diego, Park and Recreation is preparing a	The final draft management plan was completed in April 2001. Currently under review by wildlife agencies

	management plan for the Otay River Valley between 1-5 to Heritage Road.	and subject to City Council approval. Estimated completion in 2003.
Carmel Mountain and Del Mar Mesa	The City and the USFWS Refuges Division is preparing an interagency management plan for Carmel Mountain and Del Mar Mesa. The project is funded by an NCCP and Environmental Conservation Foundation (ECF) grant, a USFWS Challenge Grant and a City match of \$27,134.	A draft was completed in March 2002. Currently, the document is being revised based on comments from the wildlife agencies and the public. Estimated completion in 2004.
Black Mountain	Funded by an NCCP grant, the City of San Diego Planning Department retained a consultant to complete sensitive plant species surveys on Black Mountain, including the recently acquired Montana Mirador.	A draft management plan was completed in June 2002. Currently comments from the wildlife agencies are being incorporated into the document. This plan is subject to City Council approval. Estimated completion in 2004.
Boden Canyon	Funded by a grant awarded to the City of San Diego, the San Dieguito JPA is preparing a joint management plan for publicly owned lands in Boden Canyon.	The final draft management plan was completed in September 2001. Currently wildlife agencies are working on completing the plan. This plan is subject to City Council approval. Estimated completion in 2004.
San Diego River (West of Mission Trails)	Funded by an NCCP grant, the City of San Diego Park and Recreation is currently working with a variety of different agencies to develop a comprehensive management plan for the San Diego River.	Surveys for exotics and an exotic removal plan was developed for the San Diego River funded by the Metropolitan Wastewater Department. Additional surveys will be conducted prior to development of the management plan. Estimated completion in 2005.

The following Management Activities are completed or underway:

Table 4

MANAGEMENT ACTIVITIES COMPLETED OR UNDERWAY

LOCATION	ACTIVITY	STATUS
San Pasqual River Valley CSS Restoration	Funded by an NCCP grant, the City is restoring 15 acres of existing agricultural fields in the San Pasqual River Valley to coastal sage scrub (CSS). The restored habitat will provide connectivity between the San Pasqual River Valley and existing uplands containing gnatcatcher and other sensitive species	The site was cleared and "imprinted" with seed from coastal sage scrub species in January 2000. Maintenance and monitoring will continue through 2003 as funding becomes available.
Lopez Canyon	Working with the Friends of Los Peñasquitos Canyon (Friends) and the California Native Plant Society, the City	Permits have been obtained for this project and construction of erosion protection measures to prevent

	has secured a grant from the U.S. Fish and Wildlife Service and the State of California to restore the hydrology of Lopez Canyon for the protection and re-establishment of willowy monardella (<i>Monardella linoides ssp. viminea</i>)	undercutting of the alluvial benches on which the willowy monardella occurs will begin in August 2003. Collected seed and other source material will be used to establish new populations.
Carmel Valley –CVREP	The City has secured a grant from the State of California to remove exotic plant species from the Carmel Valley Restoration and Enhancement Project (CVREP).	Exotic plant removal was conducted in 2001 and 2002. Maintenance continued until 2003 and many exotics have been successfully eradicated.
San Pasqual/Lake Hodges	The County Agricultural Department has secured funding from the State under a Weed Management Area program to remove exotic perennial peppergrass from the San Pasqual/Lake Hodges area.	Peppergrass removal began in Spring 2001. Maintenance and monitoring will continue as long as peppergrass still needs to be controlled and funding can be obtained.
Los Penasquitos Canyon Preserve	The City has secured grants from Caltrans, USFWS, and HCF for San Diego ambrosia restoration and riparian enhancement in Penasquitos Canyon. The City also obtained an NCCP grant to conduct weeding around San Diego thorn mint populations within Penasquitos.	Ambrosia restoration began in 1996 and a final report was submitted at the end of 2001. The riparian enhancement efforts began in 1996 and 1999 and were completed in 2000. Weeding around the San Diego thorn mint was conducted in 2002 and will continue in 2003.
Sabre Springs	The City obtained an NCCP grant to conduct weeding around San Diego thorn mint populations within Sabre Springs open space.	Weeding around the San Diego thorn mint was conducted in 2002 and will continue in 2003.
Crest Canyon	The City is conducting exotic plant removal pilot project within the canyon. The effort includes covering iceplant with tarp in order to kill the species without damaging the sensitive soils on-site.	Plant removal and eradication began in August 2002 and demonstrated great success. Additional exotic removal and restoration will occur as funding becomes available.
Tecolote Canyon	The City obtained a HCF grant for riparian restoration in Tecolote Canyon. The effort included removal of exotics and replanting of native habitat.	The riparian restoration began in 1994 and was completed in June 2001. The restoration site is being maintained as needed by Park and Recreation staff.
Rose Canyon Open Space	The City obtained a HCF grant for riparian, chamise, and CSS restoration in Rose Canyon. The effort included removal of exotics and replanting of native habitat.	The restoration effort began in 1997 was completed in 2002. The restoration site is being maintained as needed by Park and Recreation staff.
Marian Bear Memorial Park	The City obtained a HCF grant for riparian, chamise, and CSS restoration in Marian Bear Memorial Park. The effort included removal of exotics and replanting of native habitat.	The restoration effort began in 1997 and was completed in January 2003.
Mission Trails Regional Park	The City conducted multiple volunteer trail closures in 2000/2001 along riparian, grassland, and CSS habitat areas. The City conducted exotic removal of water	Maintenance of volunteer trail closures is ongoing. The exotic removal effort park-wide is ongoing. Weeding around the San Diego thorn mint was

	primrose and hyacinth in Kumeyaay Lakes beginning in 2000. The City also obtained an NCCP grant to conduct weeding around San Diego thorn mint populations within Mission Trails. Park Ranger staff continue to control exotics including fennel, arrundo, artichoke thistle and lepidium park-wide. Park Ranger and volunteer staff conducted variegated dudleya mapping.	conducted in 2002 and continued in Spring of 2003. Variegated dudleya mapping is ongoing.
Otay Valley Regional Park	The City and is conducting exotic removal under various grants. An exotic plant removal plan is also in process. 500 trees have been planted and 2000 tons of trash has been removed.	The exotic removal effort is ongoing. The exotic removal plan will identify tamarisk and arundo targeted for removal within the Park.
San Diego River	The Invasive Exotic Weed Eradication Master Plan proposes to replace all exotic weed species infestations with native wetland species along the entire river within the City of San Diego limits. Two pilot projects of about 5 acres have been implemented. The San Diego River Natural Resource Management Plan (NRMP) is starting to be prepared for the area from west end of Mission Trails Regional Park to I-5. Funds provided by NCCP grant.	Pilot Projects completed April 2003. Consultant hired to start NRMP.
Famosa Slough	A wetland/upland restoration of about 1.3 acres, including stormdrain runoff control, is underway in Famosa Slough.	Estimated to be complete in 2004.
Chaparral Canyon	A wetland/upland restoration of about 3.8 acres is in progress in Chaparral Canyon.	Estimated to be complete in 2004.
Adobe Falls	A wetland/upland restoration of about 3.5 acres is underway in Adobe Falls.	Estimated to be complete in 2004.
Black Mountain Open Space	The City obtained a HCF grant in 2000 for rehabilitation of the 2.5-mile Miners Ridge Loop Trail. Trail rehabilitation will include restoration of native habitat on eroded areas. The City also obtained an NCCP grant to conduct weeding around San Diego thorn mint populations within Black Mountain	Work on the Miners Ridge Loop Trail is currently in progress. Estimated completion mid- 2004. Weeding around the San Diego thorn mint was conducted in 2002 and continued in Spring of 2003.
Mission Bay Park	Site preparation for California least tern nesting.	All site preparation was completed and number of nests at Mariner's Point and North Fiesta Island look very good.
Mission Bay Park	Tecolote Creek Wetland Treatment Project	Design is 65% complete. Funding for construction being sought.

MONITORING EFFORTS:

City staff is initiating those elements of the MSCP Biological Monitoring Plan (CDFG 1996) that can be accomplished with currently available funding. The following summarizes the status of current and proposed monitoring activities:

Vernal Pool Inventory and Management Plan: The City of San Diego (City) received funding from the U. S. Fish and Wildlife Service (USFWS) in the form of a Section 6 Planning Grant to complete a citywide inventory of vernal pools. The recorded data, such as basin location and biological surveys, will be used to develop a management plan for vernal pools within the City's jurisdiction.

Between January and May 2003, City staff used Geographic Positioning System (GPS) technology to determine the exact location of vernal pools within the City of San Diego. Consultants also conducted vernal pool plant surveys to determine the vernal pool plant species within each vernal pool complex. City staff surveyed each site to determine the coverage of sensitive plant species within each vernal pool. Dr. Andrew Bohanak (San Diego State University) and Dr. Marie Simovich (University of San Diego) surveyed for fairy shrimp in many of the vernal pool complexes throughout the City of San Diego and collected fairy shrimp for genetic testing. Currently, the City of San Diego is aggregating all the data collected for the vernal pool inventory.

Habitat Quality Pilot Project (SDSU): Working with Dr. Doug Stow of SDSU, this project evaluated remote sensing for monitoring existing habitat conditions and the detection of changes over time. Initial efforts in 2001 demonstrated that permanent plots were ineffective for habitat quality monitoring due to limited area that could be sampled. Using Marron Valley as a pilot study site, City staff is comparing field data measurements of habitat quality with remote sensing imagery. The goal is develop a cost-effective methodology for evaluating habitat conditions across the MSCP study area. A final report will be completed in the fall.

Priority Plant Monitoring: In 2003, City MSCP staff and volunteers monitored the following covered plant species (copies of these reports are available):

- Short-leaved dudleya in Crest Canyon, Skeleton Canyon, Torrey Pines State Park, Torrey Pines Extension, and Carmel Mountain. Annual monitoring on Carmel Mountain began in 1999. All other surveys began in 2001.
- San Diego thornmint in Penasquitos Preserve, Sabre Springs, Black Mountain Ranch, and Mission Trails. Annual monitoring began in 2000 for all sites except Mission Trails, where monitoring began in 2001. In addition, the Friends of Los Peñasquitos Canyon Preserve have conducted some monitoring on this species since 1992.
- Nuttall's lotus in Mission Bay. Annual monitoring began in 2000.
- Willowy Monardella in Lopez Canyon, Upper Sycamore, and Marron Valley. Annual monitoring began in 2000.
- Variegated dudleya in Otay Lakes, Spring Canyon, Mission Trails Regional Park, Allied Gardens, Penasquitos Canyon, and Black Mountain Ranch. Annual monitoring began in 2001 with the Baseline Rare Plant Monitoring Project.

- Orcutt's brodiaea in Kearny Mesa, Sabre Springs, and Del Mar Mesa. Annual monitoring began in 2001 with the Baseline Rare Plant Monitoring Project.
- Cleveland's goldenstar in Del Mar Mesa and Mission Trails Regional Park. Annual monitoring began in 2001 with the Baseline Rare Plant Monitoring Project.
- Del Mar sand aster in Carmel Valley, Carmel Mountain and Torrey Highlands. Annual monitoring began in 2001 with the Baseline Rare Plant Monitoring Project.
- San Diego ambrosia in Mission Trails Regional Park. Annual monitoring began in 1999.

Quino Checkerspot Butterfly: City staff have conducted surveys throughout City-owned land during all flight seasons since 1998.

Southwestern Pond Turtles, Bats, and Arroyo Toads: The County of San Diego is conducting surveys for southwestern pond turtles, bat species, and arroyo toads. The surveys locations include lands within the City of San Diego such as Otay Lakes, San Vicente Reservoir, Penasquitos Canyon, Mission Trails and Barrett Lake. Surveys have been conducted on some sites in 2002 and will continue into 2003. Preliminary reports are available at www.mscp-sandiego.org. It is expected that surveys will be completed in 2004.

Burrowing Owls and Other Raptors: Funded by an NCCP grant, the City has contracted Wildlife Research Institute to conduct burrowing owl and other raptor surveys in Otay Mesa. A final report of the survey effort was provided in March 2003. A copy of this report is available. The City of San Diego has also received grant funding to construct burrowing owl dens and develop a burrowing owl management plan for areas where the burrowing owl dens are constructed. This grant project is currently in the preliminary phases.

Develop Monitoring Database: City staff is working with SANDAG, the County and the wildlife agencies on a pilot project for the development of a monitoring database to track the monitoring and management activities. This project is funded by an NCCP grant. It is proposed that the information from this database will be made available via the internet to interested stakeholders. A database format has been developed and is currently being tested.

Wildlife Corridor Monitoring: Wildlife corridor monitoring is being conducted in various sites throughout the City of San Diego by Conservation Biology Institute (CBI). Several stations, including some with cameras, have been set up to track and document wildlife moving through the corridor. A copy of the report produced for this effort is available. In addition, CBI will be conducting a deer tracking study funded by the Environmental Conservation Foundation using radio collars within the Carmel Valley area. This project is in the preliminary stages and will most likely commence in 2004.

Specific monitoring efforts set for Spring 2004 will be coordinated with the wildlife agencies and the County of San Diego.

TRAINING AND PUBLIC OUTREACH:

Since 1999, members of the public and government staff have been able to access information on

the MSCP through the City's website. Located at www.sandiego.gov/mscp/ the site contains general information on the MSCP, as well as some program-related documents and maps, and City contact information. Mayor Dick Murphy's staff has designed a web page to highlight the Mayor's ten goals for the City of San Diego. These goals are available for review online at <http://genesis.sannet.gov/infospc/templates/mayor/index.jsp>. Goal Ten is to "Complete MSCP Open Space Acquisitions." This website provides information on the MSCP land acquisitions priority areas (Del Mar Mesa, East Elliott, and Otay Mesa), annual workshop reports, regional funding information and hyper-links to other state and federal websites.

MSCP staff continues to participate in training of other City staff with the focus on education of regulations associated with the MSCP and the Environmentally Sensitive Lands ordinance. MSCP staff provided presentations to City staff at regularly scheduled Project Management Academy trainings given to City operational personnel. Additionally, MSCP staff has made presentations to various public organizations including local high schools, Park and Recreation workshops, and the San Diego River group. Additional efforts are being discussed through the multi-jurisdictional MSCP Education Outreach committee, a formally recognized subcommittee of the MSCP Interagency Coordination Committee.

CONCLUSION:

Since the adoption of the City's MSCP Subarea Plan in July 1997, significant achievements have occurred which continue to contribute to the successful implementation of the City's MSCP Subarea Plan. During the 2002 reporting period, 407.1 acres of habitat were conserved in the MHPA and 103.2 acres were conserved adjacent to the MHPA. Of the 528.5 acres of habitat that was impacted due to project approvals within this same time period, 88 percent of the loss occurred outside of the MHPA. In 2002, 161 new projects were reviewed for consistency with the City's MSCP Subarea Plan.

The City continues to be successful in securing state and federal grants, many of which have been instrumental in providing for MHPA acquisitions and ongoing management and monitoring activities as described in this report. All key acquisitions, from willing sellers, in Del Mar Mesa have been completed since the last reporting period. Additional significant acquisitions of private land in East Elliott are expected to occur over the next year. Additional information on the status of the MSCP is available through the City's website. The City's MSCP Subarea Plan program objectives for the first six years have been achieved.

Keith Greer, Deputy Planning Director
Planning Department

KG:JK:ah

From: j-nsturm@sbcglobal.net
To: [PLN_PlanningCEQA](#)
Subject: Re: University City Plan Amendment
Date: Friday, January 01, 2016 11:17:43 PM

Nancy and Gerald Sturm
5977 Cozzens Street
San Diego, CA 92122
j-nsturm@sbcglobal.net

January 1, 2016

Susan Morrison, Associate Planner
City of San Diego, Planning Department
1010 Second Avenue, MS614C

Re: Environmental Analysis
University City Plan Amendment
Internal Order No: 12002051/11003327

Ms. Morrison:

We strongly urge that the ongoing and planned development in the Golden Triangle area be given very careful consideration as to the impact additional traffic will have on our existing roads in and out of the University City community. We believe that the removal of the Regents Road Bridge and the Genesee widening projects from the community plan, which appears to be the intended outcome of this analysis, would be incredibly negligent while development continues in this very congested area.

Sincerely,

Nancy Sturm
Gerald Sturm
858-453-6599

Sent from [Mail](#) for Windows 10

From: j-nsturm@sbcglobal.net
To: [PLN PlanningCEQA](#)
Subject: University City Community Plan Amendment Scoping/Comment Schedule
Date: Monday, December 14, 2015 11:58:34 AM

Nancy and Gerald Sturm
5977 Cozzens St.
San Diego, CA, 92122
j-nsturm@sbcglobal.net

Sent by email to: PlanningCEQA@sandiego.gov

Susan Morrison, Environmental Planner
City of San Diego Planning Dept.
1010 Second Ave., MS614C
San Diego, CA, 92101

Re: University City Community Plan Amendment Scoping/Comment Schedule
Internal Order No. 12002051/11003327
SCH: No. Pending

Dear Ms. Morrison:

We are writing in reference to the December 2 Notice of Preparation regarding the University City Community Plan Amendment and the scheduled December 16, 2015 scoping meeting and comment period ending January 1, 2016. We are aware that there are many University City and surrounding community residents who are extremely interested in this very important topic and would like to be a part of this scoping/comment process, but the timing of these items during the busiest month of the year will likely preclude their ability to participate.

If the purpose of this scoping meeting and comment period is to allow the public to become informed about and give input into the process, then we strongly recommend that you reschedule the scoping meeting for January and extend the comment period to the end of that month.

Sincerely,

Nancy Sturm
Gerald Sturm

Sent from [Mail](#) for Windows 10

From: [Nigel OM](#)
To: [PLN PlanningCEQA](#)
Subject: University Community Plan Amendment
Date: Sunday, December 13, 2015 7:18:20 PM

Please delete the proposals to build a Regents Road bridge and widen Genesee from the Univeristy City community plan.

Thank you,
Nigel Crawford
San Diego, CA 92122

**PALA TRIBAL HISTORIC
PRESERVATION OFFICE**

PMB 50, 35008 Pala Temecula Road
Pala, CA 92059
760-891-3510 Office | 760-742-3189 Fax



January 6, 2016

Susan Morrison
City of San Diego, Planning Dept.
1222 First Ave, MS 413
San Diego, CA 92101

Re: University Community Plan Amendment

Dear Mrs. Morrison:

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

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

We appreciate involvement with your initiative and look forward to working with you on future efforts. If you have questions or need additional information, please do not hesitate to contact me by telephone at 760-891-3515 or by e-mail at sgaughen@palatribe.com.

Sincerely,

A handwritten signature in black ink, appearing to read "Shasta C. Gaughen", is written over a light blue rectangular background.

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

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



CITY OF SAN DIEGO

PLANNING DEPARTMENT
ENVIRONMENTAL ANALYSIS

PUBLIC SCOPING MEETING

University Community Plan Amendment / DECEMBER 16, 2015

This meeting is being held pursuant to the *California Public Resources Code Section 21083.9 et seq.*, and is provided to give the public and interested parties an opportunity to submit comments regarding the potential environmental impacts of the proposed project. This information will be used to develop the scope and content of the proposed Environmental Impact Report (EIR) for the project to be described at this meeting. Please record your comments in the space provided below and submit this form to City staff at the conclusion of the meeting or you can mail to the address noted on the back of this form. Thank You.

Comments:

Please remove the bridge proposal from the community plan. Removal of this obsolete and misguided project is essential for preservation of Rose Canyon Open Space and the University City Community. EIR for the "no bridge" alternative will document the extensive benefits of Rose Canyon Open space to education and recreation in San Diego, to the environment in general, and to health and well-being in the University City and "UTC" community. Open space and canyonlands are a precious and vanishing resource and must be preserved. Conversely, the bridge project, if allowed, would invite entirely new traffic into the neighborhood and provide no relief to traffic on existing routes.

Name Paul Goldsten

Signature Paul Goldsten

Address 3104 Bunker Av 92122

Use back of sheet if additional space is necessary.

From: [Peter Hekman](#)
To: [PLN_PlanningCEQA](#)
Cc: phekman1@san.rr.com
Subject: University Community Plan Amendment, SCI No. : (Pending); Internal Order No. 12002051/11003327
Date: Thursday, December 31, 2015 6:55:44 PM

Ms. Susan Morrison
City of San Diego Planning Department
1010 Second Avenue, MS 614C
San Diego, CA 92101

Via: E-Mail

RE: University community Plann Amendment, Internal Order Number 12002051/11003327

Dear Ms. Morrison,

I am a resident of the University City Community of San Diego, having purchased my present residence at 5021 Via Papel in 1994, and have been a permanent resident at that address since mid 1998. The deed to my home contains language that I agree to construction of the Regents Road Bridge, and I have been waiting for it now for many years. I am in receipt of a copy of the above referenced document and note its posting as 02 December 2015, with a 30 day public comment period ending Friday January 01, thus the terminal date would legally be 02 January, as 01 January is a National Holiday. I am submitting these comments on 31 December 2015.

First off, I view this entire attempt orchestrated by Ms. Lightner to be completely counter to the interests of the broader University City Community and most certainly to the San Diego Community at large. Hiding the public notice in a defunct newspaper and on a city web page that normal citizens rarely if ever have reason to access, then limiting public comment to a single mid-week hearing while the entire 30 day process is enclosed in the largest holiday season of the year when few if any public interest organizations, not to mention interested individuals, are either out of area or have their interests elsewhere. The public comment period should be extended at least 30 days in the public interest. That said, let me get to the basics of the EIR considerations:

1. The NOP, Section "K" at and around page 16 – Alternatives: This Section discusses the alternatives in the context of CEQA Guidelines Section 15126.6 however the guidance to the EIR Contractor is that the retention of the long planned, approved by the Council, funded in full completion of Regents Road by completing the missing bridge across Rose Canyon is specifically denied as an alternative. In fact, the alternative to "do nothing" effectively eliminates the bridge from the consideration as a solution to the community's and the region's significant traffic situation. This language ties the hands of the EIR contractor from making a free and open appraisal of the situation and needs of the community and region. This language needs to be amended to comport with law and regulation regarding the EIR process.
2. CEQA is being revised, and the revisions should appear shortly and are contained in SB743.

This revision requires that localized effects on transportation safety should be considered, with factors that include exposures to bicyclists and pedestrians in vehicle conflict areas, including reasonable routes and elimination of unreasonable delays, for example those that cause significant variance from a direct route. The EIR should include provision for considering the forthcoming CEQA regulations. This is important since the only bicycle and pedestrian route between north and south University City is Genesee Avenue, where elevation differences reach 150 feet and where even young bicyclists have to walk their bikes up the hills. The only other North/South routes are Freeways, banned to bikes and pedestrians. Moreover, Genesee Avenue is a 45 MPH zone with little room for bikes. Regents Road completion would include both bike and pedestrian lanes, both on the proposed bridge and the street. This point is also true with Series 13 modeling from SANDAG expected to be released early in 2016. The EIR process should not proceed without consideration of these pending factors.

3. The EIR should consider the region as a whole. It is estimated that upwards of 90 percent of the traffic in, through, and around University City is commuter traffic and not indigenous to the UC Community itself. This fact comes from the 2005 EIR. The EIR must consider the fact University City is a larger economic center and job center than is downtown San Diego, downtown being more a center of tourism, government, and law while UC is a major center of business, science, academia, and medicine, resulting in a great deal of appointment type commuter traffic. This traffic originates and returns to areas as remote as Santee, Otay Mesa, Chula Vista, National City, Rancho Bernardo, Tiersanta, Poway, Del Mar, and others. In short, the entire region. The University of California San Diego is building the Eastern Campus at the head of Regents Road, in accordance with 60 year old plans for expansion, with the campus to the east of I-5 planned to be larger than the west campus. The EIR must consider that UCSD is opening two large parking facilities at the north end of Regents Road for over 2000 vehicles, to be in use by May 2016. The UCSD Medical Center, also at the head of Regents Road, is scheduled to open in May 2016, with an estimated 9,000 – 12,000 more trips per day into and out of the north end of Regents Road. I-5 and Genesee are already totally congested twice a day, at the same time the majority of these new commuters will be making their trips. Regents Road, with the required and long planned bridge, is the long planned solution to this situation, yet the NOP tries to eliminate it by directing an EIR outcome and for reasons having nothing to do with regional or community interests; only NIMBY interests. Regents Road/Claremont Mesa Blvd cross four highways and go through three Council districts. It is the natural route in and out of North UC.
4. The EIR should consider the recently completed expansion of Scripps Hospital, with its added 9,000 – 12,000 trips per day, per Scripps own survey. Scripps existed for 50 years on an EIR waiver – an EIR that required construction of the bridge - and is now on another. Legality is questionable. This factor must be considered in this EIR. The EIR should also consider the large build-out at the east end and north of Nobel Drive, and its impact on traffic. I hear now the City wants to build a fire station at the Nobel/I-805 intersection as an alternative to “no bridge”. The EIR study should include a trial run in the present traffic jam in the afternoon at this intersection and highway on-ramp. 45 minutes from Genesee to the highway on a good day, and even as late as 7 PM. I measured it myself at 7 PM.
5. The EIR must consider the effects of the planned and about to start construction of the trolley down the center of Genesee Avenue from I-5 to Nobel; a very heavily impacted area.

Running an elevated train down the middle of this street is said to not eliminate any of the present 6 lanes, however this is not proven. Moreover, the need for pillars and accesses will surely eliminate most if not all of the street space now needed for left and right turn lanes, thus worsening the already intolerable traffic situation. A trolley will not solve the problems. Sick people do not take trolleys. Nor do young professionals, and UC is full of them. UC businesses are such that many if not most workers are not of a type to car pool or use a trolley as their hours are demanding and diverse and moreover most do not live at or near a trolley station at their end, and even if they did, there is no parking in the vicinity of the stations. They are mostly drop-off points and most trolley traffic originates at the US/Mex border.

6. The EIR traffic impact study should be analyzed using the City of San Diego's Traffic Study Impact Manual (current edition), along with the CEQA Significant Thresholds, along with required mitigation measures and roadway improvements, along with cost estimates. In other words, just like the EIR that was completed in 2005 that resulted in selection of the construction of the Regents Road Bridge and completion of Regents Road as the "Preferred Alternative" to the traffic flow issues extant in University City – which have only gotten much worse with all the growth since 2005.
7. In evaluating the environmental impact of a high bridge on the canyon, the EIR should consider and compare the fact that bridges span canyons all over San Diego County, the State, the Nation, and the World – to no appreciable deleterious environmental impact. In fact, they improve the environment by providing shelter for wildlife and nesting for birds along with visual experiences for humans if designed for both auto and bike/pedestrian use. This environmental study should also consider that Rose Canyon used to be zoned Industrial, has twin railroad tracks running its length, as well as high power lines, as well as major sewer lines that are soon to be dug up and renewed. Most of the natural flora is poison oak. There are no accesses with parking, no means for handicap access, no sanitary facilities, no safety facilities, and lots of trash. I have stood on its edge for up to four hours and never seen a human being walking the canyon or bike riding through it. It is not pretty, and never will be, however one does see children and teens crossing north/south across the tracks and stream (when it actually has rainwater in it) despite the warnings and hazards.
8. Lastly, the EIR must consider the "Project" issues. The Regents Road Bridge is an approved "Project", that would have been already built and in use had not Ms. Lightner pigeon holed the Project EIR in her Committee for the past nearly seven years. The present attempt to change the Community Plan will not make this "Project" go away, nor the approved EIR that led to its adoption.

I could add a lot more, but I think this is enough, for now. I look forward to monitoring ant process. Thank you very much for accepting my comments as part of the public review process.

Respectfully submitted,

Peter M. Hekman
5021 Via Papel, San Diego, CA 92122
858-204-5744 (Cel)
858-546-3955 (Home)



CITY OF SAN DIEGO

PLANNING DEPARTMENT
ENVIRONMENTAL ANALYSIS

PUBLIC SCOPING MEETING

University Community Plan Amendment / DECEMBER 16, 2015

This meeting is being held pursuant to the *California Public Resources Code Section 21083.9 et seq.*, and is provided to give the public and interested parties an opportunity to submit comments regarding the potential environmental impacts of the proposed project. This information will be used to develop the scope and content of the proposed Environmental Impact Report (EIR) for the project to be described at this meeting. Please record your comments in the space provided below and submit this form to City staff at the conclusion of the meeting or you can mail to the address noted on the back of this form. Thank You.

COMMENTS:

The Environmental Impact Report should contain all current on-going, planned, and permitted development, by asset type, This is to include the present and planned University of California at San Diego planned East Campus development such as the new Medical Center and associated 2000 space parking structures scheduled to complete in Spring 2016, as well as all East Campus planned development which University indicates will eventually be a larger campus than the West of I-5 Campus. The EIR should also include the completed expansion of Scripps which was completed by exemption from an EIR and resulted in, per Scripps own study, 9,000 – 12,000 additional auto trips per day to and from the head of Regents Road. The traffic impacts should be analyzed using the City of San Diego's Traffic Study Impact Manual (current version), and the CEQA significant thresholds, along with required mitigation measures and roadway improvement, along with cost estimates. If the EIR is considering the removal of the Regents Road Bridge, an approved and funded project based on a prior EIR, then the EIR must consider all steps required to remove said approved project, including conclusive proof that conditions have so changed to such a degree the determinations and conclusions of the prior EIR are conclusively proven to be void and no longer applicable or that it was totally wrong in its conclusions, including public review of this process as required by law.

Name PETER M. HEKMAN JR. Signature
Address 5021 VIA PAPEL, SAN DIEGO CA 92132

Use back of sheet if additional space is necessary.

OVER PLEASE

When it comes to Global Warming, and the City's new "Plan" and "Goals", one should bear in mind the scientific fact that just one Eruption of Mount Pinatubo in the Philippines several years ago placed more global warming gases into the atmosphere than has all of human activity since the dawn of human history. There are over 250 active volcanoes in the world today. And there are people who still think that reducing cars and roof top panels will have an effect. ?? Go figure. ☺

From: [Petr Krysl](#)
To: [PLN PlanningCEQA](#)
Subject: University Community Plan Amendment
Date: Sunday, December 13, 2015 6:38:55 PM

The mayor and the councilmember Lightner have shown great concern for the community and a vision for the quality of life in University City in the future by being open-minded about planning of the traffic elements.

I wish to add a comment to the NOP: I would like to stress that ALL the alternatives should consider the planned mass transit improvements, not just a few selected ones. The EIR is not clear on this count: it appears that the mass transit in development or being planned is only considered in some alternatives.

Thank you,

--

Petr Krysl
4013 Camino Lindo
San Diego, CA 92122

From: [Petr Krysl](#)
To: [PLN.PlanningCEQA](#)
Subject: University Community Plan Amendment
Date: Saturday, December 19, 2015 9:02:08 AM

The initiated study of the traffic conditions in the UC is very much needed. The conditions have changed since the last time this issue was visited, and more additional traffic impacts and also traffic improvements are in the pipeline. The Mayor and the Council President Lightner had the vision and the resolve to look at the issue of traffic through the UC and to consider the true needs of the community. I would like to thank both!

I would like to stress the need to consider alternative modes of transportation, especially bicycles. The UC, especially the North, is home to a large number of students from the UCSD. The more students we get out of their cars, the better off we will be. A precondition of this happening is a reasonable network of bicycle paths. I wonder if the scope of the EIR could incorporate a more detailed look at the existing and future conditions of bike transportation.

Thank you,

--

Petr Krysl
4013 Camino Lindo
San Diego, CA 92122



CITY OF SAN DIEGO

PLANNING DEPARTMENT
ENVIRONMENTAL ANALYSIS
PUBLIC SCOPING MEETING

University Community Plan Amendment / DECEMBER 16, 2015

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Comments: I was at the 12/16, and I do want to add some comments; even though the meeting is over. I live on the east side of University City and have long hoped that we could move forward on the Regents Road Bridge. As you know, it was passed by the Council several years ago with the enthusiastic endorsement of the mayor, (Senders) the Police Department and the Fire Department. Residents of the west side of University City, particularly in a small neighborhood called ".....for living" did a wonderful job of throwing up road blocks. I do have to admire their ingenuity and creativity. They managed to put like-minded neighbors on the UCPG so that they could stop any attempt to move forward with the bridge. They put forward an environmental concern about the animals in Rose Canyon. (Evidently, the animals in the canyon under the bridge on Genesee don't count.) So the community has been thwarted in its attempt to complete our community plan and relieve some of the pressure on Genesee Ave. *with the expansion of UCC, the continued growth at NCSU and the updating of Costa Verde, it is clear Genesee will take the brunt of increased traffic. To count on widening Genesee without the relief of the bridge will be asking for chaos. Please do not let the well-organized NIMBYs who want to protect their property values ruin life in UC for the rest of us. I think the decision should be clear. Thanks.*

Name Phyllis Speer Signature Phyllis Speer
Address 5978 KAREN AVE LN. SD 92122

Use back of sheet if additional space is necessary.

From: [Pia Mantovani-Sud](#)
To: [PLN_PlanningCEQA](#)
Subject: UNIVERSITY COMMUNITY PLAN AMENDMENT
Date: Tuesday, December 08, 2015 9:16:38 AM

Dear Mrs. Morrison

I'm writing to you in reference of Schedule No.: Pending (Internal Order 12002051/11003327).

Please consider extending the timing of the NOP and Scoping beyond the January 1st, 2016 deadline, as we are all busy with the ongoing Holidays Season.

It is more than fair to ask this, as the city and the county will also be closed for the Holidays.

Sincerely

Pia Mantovani-Sud

Mankind must put an end to war before war puts an end to mankind. [John F. Kennedy](#)

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1416 Ninth Street
Sacramento, California 94296-0001**

**Telephone: (916) 653-7423
FAX: (916) 653-6511**

IMPORTANT

Before you incur costs against the grant, the funds must be appropriated by the Legislature. All requirements must be met and an agreement signed before any funds will be disbursed.

An audit may be performed before or after final payment.

An Application for grant funds consists of one copy each of the following:

1. Application Form
2. Authorizing Resolution from governing body.
3. Environmental Impact Report or Negative Declaration along with a response from the State Clearinghouse; and a copy of the Notice of Determination filed with, and stamped by, the County Clerk; and documentation that the Department of Fish and Game CEQA fee was paid or is not applicable; or a copy of the Notice of Exemption on file with the County Clerk if the project is categorically exempt.
4. Project location map (city or county) with enough detail to allow a person unfamiliar with the area to locate the project.
5. Evidence of adequate land tenure (lease, joint powers agreement, etc.) for development projects.
6. Acquisition map showing exterior boundaries and parcel numbers.
7. Site plan showing location of specific facilities to be developed (development projects).
8. Acquisition Schedule showing each parcel to be acquired (acquisition projects).
9. Cost Estimate (development projects).
10. Indication of amount, type and source of funds above grant provided by applicant.
11. Permit or comments from the following if applicable:
 - a. State Lands Commission
 - b. San Francisco Bay Conservation and Development Commission (BCDC)
 - c. Coastal Commission
 - d. Corps of Engineers
12. All leases, agreements, etc., affecting project lands or the operation and maintenance thereof.
13. Completed project proposal.
14. Photos of project site.

ASSURANCES

Applicant possesses legal authority to apply for the grant, and to finance, acquire, and construct the proposed project; that a resolution, motion or similar action has been duly adopted or passes as an official act of the applicant's governing body authorizing the filing of the application, including all understandings and assurances contained therein, and directing and authorizing the person identified as the official representative of the applicant to act in connection with the application and to provide such additional information as may be required.

Applicant will maintain and operate the property acquired, developed, rehabilitated, or restored with the funds in perpetuity. With the approval of the granting agency, the applicant or its successors in interest in the property may transfer the responsibility to maintain and operate the property in accordance with Section 5919 of the Public Resources Code.

Applicant will use the property only for the purposes of the California Wildlife Protection Act of 1990 and to make no other use, sale, or other disposition of the property except as authorized by specific act of the Legislature.

Applicant will give the State's authorized representative access to and the right to examine all records, books, papers, or documents related to the grant.

Applicant will cause work on the project to be commenced within a reasonable time after receipt of notification for the State that funds have been approved and that the project will be prosecuted to completion with reasonable diligence.

Applicant will comply where applicable with provisions of the California Environmental Quality Act and the California Relocation Assistance Act, any other state, and/or local laws, and/or regulations.

DPR 879 (Back)



CITY OF SAN DIEGO

PLANNING DEPARTMENT
ENVIRONMENTAL ANALYSIS

PUBLIC SCOPING MEETING

University Community Plan Amendment / DECEMBER 16, 2015

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Thank You.

Comments:

Please find attached discussions of:

A. Mid-Coast Corridor + comparative computer rail trip times.

B. Need in community for Coaster transit in University City. Particularly a University City Transit Center near the Sorrento Valley Transit Center. Parking garage + freeway access similar to MTS Pensacitas/Sabre Springs, I-15 Ted Williams Parkway.

These Coaster Stations could provide connections w/shuttle, bus, tram, battery operated trolleys, + future driverless cars.

Name Rebecca Robinson Hood Signature Rebecca Robinson Hood

Address PO Box 910523, San Diego, CA 92121

Use back of sheet if additional space is necessary.



Rebecca Robinson Wood <rsrobinsonco@gmail.com>

A) Mid-Coast Corridor (San Diego Trolley), B) Sorrento Valley Train Station

4 messages

Rebecca Robinson Wood <rsrobinsonco@gmail.com>
 To: Janay Kruger <janay_kruger@msn.com>

Tue, Dec 15, 2015 at 10:00 PM

December 15, 2015

Janay,

Here are a few ideas I thought about and may have mentioned in previous e-mails.

A) Some comparative commute times are included here of the NCTD Coaster, San Diego Trolley, and the NCTD Sprinter schedules.

1) The NCTD Coaster Schedule published commute time is 26 to 32 minutes for the existing Coaster train route from Sorrento Valley Train Station to Santa Fe Depot in San Diego (14.9 mile per MapQuest).

2) NCTD Sprinter schedule shows 36 minute commute from the Oceanside Transit Center to Palomar College (16 miles per MapQuest).

3) The San Diego Trolley GreenLine schedule shows 41 minutes commute time from Santa Fe Depot to Grossmont Center in La Mesa (13.5 miles per MapQuest).

4) The Blue Line Trolley route from San Ysidro ends at America Plaza with a published commute time of 45 minutes (17 miles per MapQuest).

5) Proposed Blue Line, the commute time from San Ysidro to Nobel Drive station 85 minutes (See #4 above for southern existing route 45 minutes plus 40 minutes estimated commute time to the proposed Nobel Drive station (12.7 mile per MapQuest distance from America Plaza to La Jolla Village Square).

The commute from Nobel Drive station to downtown San Diego at an estimated 40 minutes seems a tolerable amount of time, however, adding an additional 45 minutes to the trip to go to San Ysidro is quite a time commitment, almost three hours for a round trip. If the intent is to continue this like the Pacific Surfliner for a major distance to make commuting to areas distant and central in the state I understand.

We may want to confirm the fact that the MTS Parking Permit (Compass Parking pass) and transit passes require no identification. My understanding is that identification is only required for discount passes.

B) By the time the trolley line is constructed we may have driverless cars. Seems that having a parking lot at the Coaster station with these type vehicles waiting to deliver people to their unique locations may be preferable.

Expanding the capacity of the existing Sorrento Valley Station with increased parking or adding an additional station a few hundred feet to the south so a train may stop once for simultaneous departure and boarding of passengers at the two stations, the Sorrento Valley and University City stations to serve the transportation needs of the area residents, employees and employers in both communities. The University City riders may be delivered to University City via shuttle, bus, battery operated trolley, trams, (driverless cars in near future.) A parking garage within walking distance of the transit center with easy freeway on-off ramps and garage access, similar to the MTS facility recently constructed by MTS at the SEC Interstate 15 and Ted Williams Parkway which serves the communities of Rancho Pensacitos and Sabre Springs, maybe helpful.

If there is not enough land in the vicinity of the existing Sorrento Valley location for a major parking garage and easy I-805/ I-5 access ramps, you may consider locating a new expanded rail station at the southern end of Roselle Street, thus providing transit and parking to both communities from one larger station.

Please call or e-mail with any questions.

Thank You.

Rebecca Robinson Wood
 P. O. Box 910523
 San Diego, CA 92121
 1 (858) 922-7731
 rsrobinsonco@gmail.com

Janay Kruger <janay_kruger@msn.com>
To: Rebecca Robinson Wood <rsrobinsonco@gmail.com>

Wed, Dec 16, 2015 at 7:45 AM

Bring these tonight in writing.

Sent from my iPhone

[Quoted text hidden]

Rebecca Robinson Wood <rsrobinsonco@gmail.com>
To: Janay Kruger <janay_kruger@msn.com>

Wed, Dec 16, 2015 at 9:35 AM

December 16, 2015

I plan to be at the meeting.
Thanks for asking.

[Quoted text hidden]

Janay Kruger <janay_kruger@msn.com>
To: Rebecca Robinson Wood <rsrobinsonco@gmail.com>

Wed, Dec 16, 2015 at 9:43 AM

Good. Bring your traffic related comments to hand in.

Sent from my iPhone

[Quoted text hidden]

Memo/Questions to: City of San Diego, SANDAG

From: Rebecca Robinson Wood

Date: December 16, 2015

Subject: UCCP AREA Transportation Plan and Mid-Coast Corridor (San Diego North Trolley)

This communication includes various quotes, excerpts from transportation schedules and various Documents, budgets, etc.

By Roger K. Lewis Friday, October 8, 2010; 5:30 PM

"..., as transportation infrastructure, light rail is effective only when it is part of a diversified, integrated system. A single light-rail line by itself is rarely cost-effective if its only purpose is to move riders from origins to destinations along the line, an objective that usually can be achieved less expensively with buses. "

Roger K. Lewis is a practicing architect and a professor emeritus of architecture at the University of Maryland.

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For D.C. Streetcar Line, 2.2 Miles' ..."

By: Martin Di Caro

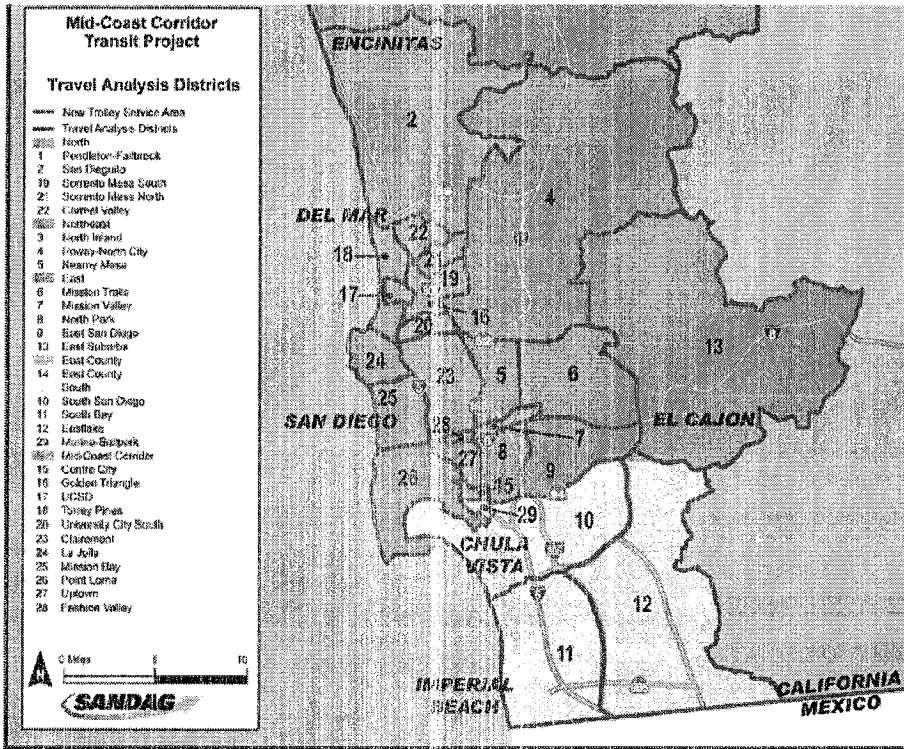
March 11, 2015

"...\$160 million project ..."

Equates to a cost of this project \$73 million per mile. Please refer to the last page of this communication which shows the current proposed budget of the Mid Coast Corridor (San Diego North Trolley) is \$193 million per mile for the 10.93 mile addition.

Questions to SANDAG:

- 1) Please disclose the Travel Analysis District # for the area west of I-5, south of UCSD and north of SR52?



Source: SANDAG, 2012

2) Please tell me why the Airport connections are missing from the city transportation plan? And maps I have observed in the documents. Why are "0" trips from the airport in the Table 1-1? If we have an international airport, am I wrong to assume the airport should be the source of many trips to areas in the city and the county? Do you think that the airport should be part of the transportation system in the county?

Table 1-1. 2010 and 2030 Daily Trips To, From, and Within the Mid-Coast Corridor by Trip Purpose

Trip Purpose	Trips to the Corridor (External Production)	Trips from the Corridor (External Attraction)	Trips within the Corridor (Internal)	Total Trips Attracted to the Corridor (Internal + External Production)	Total Trips Produced by the Corridor (Internal + External Attraction)
2010 Daily Trips					
Home-Work	243,300	124,900	149,700	393,000	274,600
Home-College	50,600	3,200	19,700	70,300	22,900
Home-School	43,000	2,500	62,000	105,000	64,500
Home-Shopping	21,100	77,300	174,000	195,100	251,300
Home-Other	174,500	151,800	328,100	502,600	479,900
Work-Other	113,900	150,500	231,900	345,800	382,400
Other-Other	218,300	218,200	411,300	629,600	629,500
Serve Passenger ²	58,400	44,600	192,800	251,200	237,400
Visitor	28,200	129,900	146,300	174,500	276,200
Airport	96,600	0	18,600	115,200	18,600
Total	1,047,900	902,900	1,734,400	2,782,300	2,637,300
2030 Daily Trips					
Home-Work	262,900	133,900	183,100	446,000	317,000
Home-College	55,100	2,800	21,200	76,300	24,000
Home-School	45,100	3,100	63,500	108,600	66,600
Home-Shopping	20,700	92,900	190,200	210,900	283,100
Home-Other	215,400	196,900	422,700	638,100	619,600
Work-Other	130,100	188,700	269,500	399,600	438,200
Other-Other	251,100	250,900	492,800	743,900	743,700
Serve Passenger ²	73,600	53,400	230,100	303,700	283,500
Visitor	32,100	171,100	196,200	228,300	367,300
Airport	164,000	0	28,700	192,700	28,700
Total	1,250,100	1,073,700	2,098,000	3,348,100	3,171,700

Source: Series 11 model

Notes: ¹ Internal trips have both ends within the corridor.

² Serve passenger trips are home-based trips taken to assist a passenger in the vehicle (e.g., a parent dropping a child off at daycare).

3) Based upon the budget, it appears bus routes 41 and 150 are the only profitable bus trips in the San Diego MTS system. Are these routes intended to continue to serve their respective community areas?

Popular bus routes with high per hour passenger use:

Route 41: Linda Vista, Mesa College, to University Town Center

Route 150: downtown, Old Town, UCSD/VA Hospital.

Table 1-3. Existing Transit System Performance, 2010

Transit Service	Average Speed (mph)		Average Weekday Boardings	Peak-Period Peak-Direction Load Factor	On-Time Performance		Passengers per Service Hour
	AM Peak	PM Peak			AM Peak	PM Peak	
Route 50	16.6 NB	16.6 SB 16.9 NB	1,139	0.45	93.4%	85.8%	27.9
Route 150	17.9 NB	17.6 SB 17.6 NB	2,101	1.17	91.3%	86.3%	43.1
Route 105	15.9 SB 16.0 NB	14.9 SB 15.2 NB	1,290	0.57	95.6%	85.8%	31.5
Route 30	13.9 NB	12.9 SB	6,654	1.35	92.1%	79.4%	31.6
Route 41	14.8 NB	14.1 SB 14.2 NB	3,888	1.19	92.6%	75.4%	43.4
Trolley Blue Line	20.0 (Daily)	20.0 (Daily)	52,416	1.88	93.1% (Daily)		278.4
Trolley Green Line	N/A	N/A	18,584	0.86	97.0% (Daily)		170.0
Trolley Orange Line	N/A	N/A	20,284	1.51	93.4% (Daily)		126.5

Source: SANDAG, 2014v

Notes: mph = miles per hour; N/A = not available (average speed for the Trolley Green and Orange Lines was not available); NB = northbound; SB = southbound

4) Are you aware that the MTS Blue line trolley schedule shows a one-way trip time of 45 minutes between San Ysidro and America Plaza (17 miles per MapQuest) and does not at this time go to Santa Fe Depot?

The addition of the distance from America Plaza to the proposed Nobel Drive Station (12.7 miles per MapQuest) will add an estimated 40 minutes.

5) Do many trolley travellers spend almost three hours on the trolley each day to get to and from work and school?

Blue Line

Monday through Friday / lunes a viernes

SAN YSIDRO → DOWNTOWN

San Ysidro	Iris Avenue	H Street	8th Street	12th & Imperial	City College	America Plaza
4:43a	4:50a	4:59a	5:07a	5:16a	5:21a	5:28a
4:50	4:57	5:06	5:14	5:23	5:28	5:35
4:58	5:05	5:14	5:22	5:31	5:36	5:43
5:05	5:12	5:21	5:29	5:38	5:43	5:50
5:13	5:20	5:29	5:37	5:46	5:51	5:58
5:20	5:27	5:36	5:44	5:53	5:58	6:05
AND THEN EVERY 7-8 MINUTES AT / Y LUEGO CADA 7-8 MINUTOS A LA:						
5:28	5:35	5:44	5:52	6:01	6:06	6:13
5:35	5:42	5:51	5:59	6:08	6:13	6:20
5:43	5:50	5:59	6:07	6:16	6:21	6:28

DOWNTOWN → SAN YSIDRO

America Plaza	City College	12th & Imperial	8th Street	H Street	Iris Avenue	San Ysidro
—	—	—	B 4:08a	4:16a	4:24a	4:33a
—	—	—	B 4:16	4:24	4:32	4:41
—	—	—	B 4:23	4:31	4:39	4:48
—	—	—	B 4:31	4:39	4:47	4:56
—	—	—	B 4:38	4:46	4:54	5:03
—	—	—	B 4:46	4:54	5:02	5:11
—	—	—	B 4:53	5:01	5:09	5:18
—	—	—	B 5:01	5:09	5:17	5:26
4:48a	4:54a	5:00a	5:08	5:16	5:24	5:33
—	—	—	B 5:16	5:24	5:32	5:41

3:13p	3:20p	3:29p	3:37p	3:46p	3:51p	3:58p
3:28	3:35	3:44	3:52	4:01	4:06	4:13
AND THEN EVERY 7-8 MINUTES AT / Y LUEGO CADA 7-8 MINUTOS A LA:						
3:28	3:35	3:44	3:52	4:01	4:06	4:13
3:35	3:42	3:51	3:59	4:08	4:13	4:20
3:43	3:50	3:59	4:07	4:16	4:21	4:28
3:50	3:57	4:06	4:14	4:23	4:28	4:35
3:58	4:05	4:14	4:22	4:31	4:36	4:43
4:05	4:12	4:21	4:29	4:38	4:43	4:50
4:13	4:20	4:29	4:37	4:46	4:51	4:58
4:20	4:27	4:36	4:44	4:53	4:58	5:05
UNTIL / HASTA:						
6:28	6:35	6:44	6:52	7:01	7:06	7:13
6:43	6:50	6:59	7:07	7:16	7:21	7:28
6:58	7:05	7:14	7:22	7:31	7:36	7:43
7:13	7:20	7:29	7:37	7:46	7:51	7:58
7:28	7:35	7:44	7:52	8:01	8:06	8:13
7:43	7:50	7:59	8:07	8:16	8:21	8:28
7:58	8:05	8:14	8:22	8:31	8:36	8:43
8:13	8:20	8:29	8:37	8:46	8:51	8:58
8:28	8:35	8:44	8:52	9:01	9:06	9:13
8:43	8:50	8:59	9:07	9:16	9:21	9:28
8:58	9:05	9:14	9:22	9:31	9:36	9:43
9:28	9:35	9:44	9:52	10:01	10:06	10:13
9:58	10:05	10:14	10:22	10:31	10:36	10:43
10:28	10:35	10:44	10:52	11:01	11:06	11:13
10:58	11:05	11:14	11:22	11:31	11:36	11:43
11:28	11:35	11:44	11:52	12:01a	12:06a	12:13a
11:58	12:05a	12:14a	12:22a	12:31	12:36	12:43
12:28a	12:35	12:44	12:52	1:01	1:06	1:13
12:58	1:05	1:14	1:22	1:31	1:36	1:43

7:33	7:39	7:45	7:53	8:01	8:06	8:18
7:48	7:54	8:00	8:08	8:16	8:24	8:33
8:03	8:09	8:15	8:23	8:31	8:39	8:48
AND THEN EVERY 15 MINUTES AT / Y LUEGO CADA 15 MINUTOS A LA:						
7:18	7:24	7:30	7:38	7:46	7:54	8:03
7:33	7:39	7:45	7:53	8:01	8:09	8:18
7:48	7:54	8:00	8:08	8:16	8:24	8:33
8:03	8:09	8:15	8:23	8:31	8:39	8:48
UNTIL / HASTA:						
2:18p	2:24p	2:30p	2:38p	2:46p	2:54p	3:03p
2:33	2:39	2:45	2:53	3:01	3:09	3:18
AND THEN EVERY 7-8 MINUTES AT / Y LUEGO CADA 7-8 MINUTOS A LA:						
2:33	2:39	2:45	2:53	3:01	3:09	3:18
2:41	2:47	2:53	3:01	3:09	3:17	3:26
2:48	2:54	3:00	3:08	3:16	3:24	3:33
2:56	3:02	3:08	3:16	3:24	3:32	3:41
3:03	3:09	3:15	3:23	3:31	3:39	3:48
3:11	3:17	3:23	3:31	3:39	3:47	3:56
3:18	3:24	3:30	3:38	3:46	3:54	4:03
3:26	3:32	3:38	3:46	3:54	4:02	4:11
UNTIL / HASTA:						
5:33	5:39	5:45	5:53	6:01	6:09	6:18
5:48	5:54	6:00	6:08	6:16	6:24	6:33
6:03	6:09	6:15	6:23	6:31	6:39	6:48
AND THEN EVERY 15 MINUTES AT / Y LUEGO CADA 15 MINUTOS A LA:						
5:18	5:24	5:30	5:38	5:46	5:54	6:03
5:33	5:39	5:45	5:53	6:01	6:09	6:18
5:48	5:54	6:00	6:08	6:16	6:24	6:33
6:03	6:09	6:15	6:23	6:31	6:39	6:48
UNTIL / HASTA:						
8:18	8:24	8:30	8:38	8:46	8:54	9:03
8:48	8:54	9:00	9:08	9:16	9:24	9:33
9:18	9:24	9:30	9:38	9:46	9:54	10:03

Orange Line

Monday through Friday / lunes a viernes

EL CAJON → DOWNTOWN

El Cajon	Grossmont Center	Spring Street	Euclid Avenue	12th & Imperial	City College	Santa Fe Depot
—	—	—	—	4:31a	4:36a	4:45a
—	—	—	—	4:46	4:51	5:00
—	—	—	—	5:01	5:06	5:15
—	—	—	C 4:59a	5:12	5:17	5:26
4:48a	4:55a	5:01a	5:14	5:27	5:32	5:41
5:03	5:10	5:16	5:29	5:42	5:47	5:56
AND THEN EVERY 15 MINUTES AT / Y LUEGO CADA 15 MINUTOS A LA:						
5:18	5:25	5:31	5:44	5:57	6:02	6:11
5:33	5:40	5:46	5:59	6:12	6:17	6:26
5:48	5:55	6:01	6:14	6:27	6:32	6:41
6:03	6:10	6:16	6:29	6:42	6:47	6:56
UNTIL / HASTA:						
8:18p	8:25p	8:31p	8:44p	8:57p	9:02p	9:11p
8:48	8:55	9:01	9:14	9:27	9:32	9:41
9:18	9:25	9:31	9:44	9:57	10:02	10:11
9:48	9:55	10:01	10:14	10:27	10:32	10:41
10:18	10:25	10:31	10:44	10:57	11:02	11:11
10:48	10:55	11:01	11:14	11:27	11:32	11:41
11:18	11:25	11:31	11:44	11:57	12:02a	12:11a
11:48	11:55	12:01a	12:14a	12:27a	12:32	12:41
12:18a	12:25a	12:31	12:44	12:57	1:02	1:11
12:48	12:55	1:01	1:14	1:27	1:32	1:41

DOWNTOWN → EL CAJON

Santa Fe Depot	City College	12th & Imperial	Euclid Avenue	Spring Street	Grossmont Center	El Cajon
—	—	—	D 4:16a	4:29a	4:35a	4:42a
—	—	—	D 4:31	4:44	4:50	4:57
—	—	—	D 4:46	4:59	5:05	5:12
—	—	—	D 5:01	5:14	5:20	5:27
4:49a	4:57a	5:03a	5:16	5:29	5:35	5:42
5:04	5:12	5:18	5:31	5:44	5:50	5:57
AND THEN EVERY 15 MINUTES AT / Y LUEGO CADA 15 MINUTOS A LA:						
5:19	5:27	5:33	5:46	5:59	6:05	6:12
5:34	5:42	5:48	6:01	6:14	6:20	6:27
5:49	5:57	6:03	6:16	6:29	6:35	6:42
6:04	6:12	6:18	6:31	6:44	6:50	6:57
UNTIL / HASTA:						
7:19p	7:27p	7:33p	7:46p	7:59p	8:05p	8:12p
7:49	7:57	8:03	8:16	8:29	8:35	8:42
8:19	8:27	8:33	8:46	8:59	9:05	9:12
8:49	8:57	9:03	9:16	9:29	9:35	9:42
9:19	9:27	9:33	9:46	9:59	10:05	10:12
9:49	9:57	10:03	10:16	10:29	10:35	10:42
10:19	10:27	10:33	10:46	10:59	11:05	11:12
10:49	10:57	11:03	11:16	11:29	11:35	11:42
11:19	11:27	11:33	11:46	11:59	12:05a	12:12a
11:49	11:57	12:03a	12:16a	12:29a	12:35	12:42

The Green Trolley Line schedule shows the transit commute from Grossmont Center to the Santa Fe Depot is 41 minutes (13.5 miles per MapQuest).

Green Line

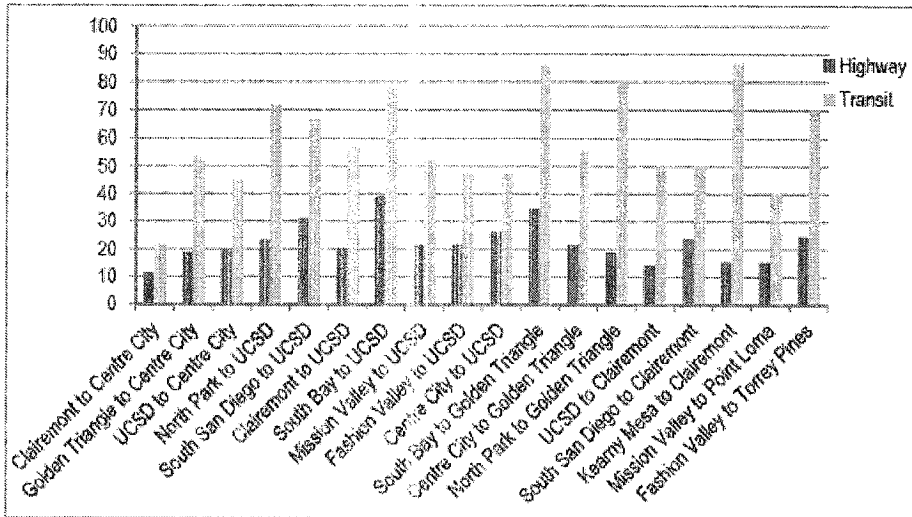
Monday through Friday / Lunes a viernes

SANTEE → DOWNTOWN								
Santee	El Cajon	Grossmont Center	SDSU	Qualcomm Stadium	Fashion Valley	Old Town	Santa Fe Depot	12th & Imperial
---	---	---	---	4:53a	5:01a	5:08	5:17	5:26
---	---	---	---	5:23	5:31	5:38	5:47	5:56
5:04a	5:14a	5:21a	5:30a	5:38	5:46	5:53	6:02	6:11
5:19	5:29	5:36	5:45	5:53	6:01	6:08	6:17	6:26
5:34	5:44	5:51	6:00	6:08	6:16	6:23	6:32	6:41
AND THEN EVERY 15 MINUTES AT / Y LUEGO CADA 15 MINUTOS A LA:								
5:49	5:59	6:06	6:15	6:23	6:31	6:38	6:47	6:56
6:04	6:14	6:21	6:30	6:38	6:46	6:53	7:02	7:11
6:19	6:29	6:36	6:45	6:53	7:01	7:08	7:17	7:26
6:34	6:44	6:51	7:00	7:08	7:16	7:23	7:32	7:41
UNTIL / HASTA:								
8:49p	8:59p	9:06p	9:15p	9:23p	9:31p	9:38p	9:47p	9:56p
9:19	9:29	9:36	9:45	9:53	10:01	10:08	10:17	10:26
9:49	9:59	10:06	10:15	10:23	10:31	10:38	10:47	10:56
10:19	10:29	10:36	10:45	10:53	11:01	11:08	11:17	11:26
10:49	10:59	11:06	11:15	11:23	11:31	11:38	11:47	11:56
---	---	---	11:30	11:38	11:46	11:53	12:02a	12:11a
11:19	11:29	11:36	11:45	11:53	12:01a	12:08a	12:17	12:26
---	---	---	12:00a	12:08a	12:16	12:23	12:32	12:41
---	---	---	12:30	12:38	12:46	12:53	1:02	1:11

DOWNTOWN → SANTEE								
12th & Imperial	Santa Fe Depot	Old Town	Fashion Valley	Qualcomm Stadium	SDSU	Grossmont Center	El Cajon	Santee
---	A 3:59a	4:08a	4:14a	4:22a	4:30a	4:40a	4:47a	4:58a
---	A 4:14	4:23	4:29	4:37	4:45	4:55	5:02	5:13
---	A 4:21	4:30	4:36	4:44	---	---	---	---
---	A 4:29	4:38	4:44	4:52	5:00	5:10	5:17	5:28
---	A 4:36	4:45	---	---	---	---	---	---
---	A 4:44	4:53	4:59	5:07	5:15	5:25	5:32	5:43
---	A 4:51	5:00	5:06	5:14	---	---	---	---
4:51a	4:59	5:08	5:14	5:22	5:30	5:40	5:47	5:58
---	A 5:06	5:15	---	---	---	---	---	---
5:06	5:14	5:23	5:29	5:37	5:45	5:55	6:02	6:13
5:21	5:29	5:38	5:44	5:52	6:00	6:10	6:17	6:28
AND THEN EVERY 15 MINUTES AT / Y LUEGO CADA 15 MINUTOS A LA:								
5:36	5:44	5:53	5:59	6:07	6:15	6:25	6:32	6:43
5:51	5:59	6:08	6:14	6:22	6:30	6:40	6:47	6:58
6:06	6:14	6:23	6:29	6:37	6:45	6:55	7:02	7:13
6:21	6:29	6:38	6:44	6:52	7:00	7:10	7:17	7:28
UNTIL / HASTA:								
7:36p	7:44p	7:53p	7:59p	8:07p	8:15p	8:25p	8:32p	8:43p
8:06	8:14	8:23	8:29	8:37	8:45	8:55	9:02	9:13
8:36	8:44	8:53	8:59	9:07	9:15	9:25	9:32	9:43
9:06	9:14	9:23	9:29	9:37	9:45	9:55	10:02	10:13
9:36	9:44	9:53	9:59	10:07	10:15	10:25	10:32	10:43
10:06	10:14	10:23	10:29	10:37	10:45	10:55	11:02	11:13
10:36	10:44	10:53	10:59	11:07	11:15	---	---	---
11:06	11:14	11:23	11:29	11:37	11:45	---	---	---
11:36	11:44	11:53	11:59	12:07a	12:15a	---	---	---

Figure 1-6 compares highway and transit travel times between various trip origins and destinations in 2010 (refer to Figure 1-2 for the location of each origin and destination). For this comparison, transit travel time includes both time riding the transit vehicle and time waiting at a station for the transit vehicle to arrive, but does not include access time to and from the transit system. Transit station waiting time is assumed to be half the headway, which is the estimated time between transit vehicle arrivals. For example, trains with 15-minute headways would have an estimated station waiting time of 7.5 minutes.

Figure 1-6. Highway and Transit Travel Times between Travel Analysis Districts, Existing Conditions in 2010



Source: Series 11 model

As shown, transit travel times are 50 to 200 percent longer than the highway travel time for the same trip. This is particularly true for those trips that require a transfer, such as trips between the Mission Valley (District 7), Fashion Valley (District 28), and UCSD (District 17) travel analysis districts, and trips between the South Bay (District 11) and the Golden Triangle (District 16) travel analysis districts. These are among the largest

MID-COAST CORRIDOR TRANSIT PROJECT

September 2014

1-19

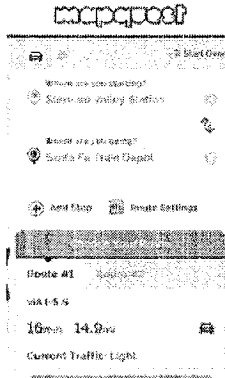
North County Transit District Coaster Schedule shows weekday passenger travel time from just north of UCCP Area at Sorrento Valley Station to Santa Fe Depot in downtown San Diego ranges from 26 to 32 minutes, not the 45 to 48 minutes identified in Figure 1-6 above (UCSD to Centre City or Centre City to UCSD).

Sorrento Valley	+	5:44a*	6:32a	7:10a	7:51a	8:15a	10:12a*	11:39a*	3:05p*	4:08p	5:38p	6:17p	7:34p*	9:52p
San Diego-Old Town	+	6:05a	6:53a	7:32a	8:14a	8:38a	10:34a	11:59a	3:28p	4:30p	6:01p	6:42p	7:59p	10:17p
San Diego-SF Depot	+	6:13a	7:00a	7:40a	8:20a	8:45a	10:43a	12:06p	3:36p	4:37p	6:08p	6:49p	8:07p	10:25p

NORTHBOUND		MONDAY-FRIDAY													
STATION	STATION	STATION	STATION	STATION	STATION	STATION	STATION	STATION	STATION	STATION	STATION	STATION	STATION	STATION	STATION
SAN DIEGO TO OCEANSIDE	5:51	6:31	7:11	7:51	8:31	9:11	9:51	10:31	11:11	11:51	12:31	1:11	1:51	2:31	3:11
San Diego-SF Depot	6:26a	7:06a	7:46a	8:26a	9:06a	9:46a	10:26a	11:06a	11:46a	12:26p	1:06p	1:46p	2:26p	3:06p	3:46p
San Diego-Old Town	6:34a	7:14a	7:54a	8:34a	9:14a	9:54a	10:34a	11:14a	11:54a	12:34p	1:14p	1:54p	2:34p	3:14p	3:54p
Sorrento Valley	6:55a	7:35a	8:15a	8:55a	9:35a	10:15a	10:55a	11:35a	12:15p	1:34p	2:43p	3:12p	4:02p	5:19p	6:02p

NCTD has also offered to provide transit to the SD Convention Center.

The distance from the Sorrento Valley Station to Santa Fe Train Depot, per MapQuest is 14.9 miles and the time of the freeway drive 16 minutes.



The NCTD Sprinter schedule shows the commute from Oceanside Transit Center to Palomar College as 36 minutes (16 miles per MapQuest).

SPRINTER S												
OCEANSIDE TO ESCONDIDO						ESCONDIDO TO OCEAN						
STATIONS	57 MIN FREQUENCY	AM	PM	AM	PM	MONDAY	TUESDAY	WEDNESDAY	THURSDAY	FRIDAY	SATURDAY	SUNDAY
Oceanside Transit Center	13	6:05	6:33	5:03	5:31	6:05	6:33	7:05	7:35	8:05	8:35	9:05
Coast Highway	15	6:05	6:05	5:05	5:05	6:25	7:05	7:35	8:05	8:35	9:05	9:35
Crest Street	17	6:07	6:07	5:07	5:07	6:27	7:07	7:37	8:07	8:37	9:07	9:37
El Camino Real	18	6:11	6:11	5:11	5:11	6:43	7:23	7:53	8:23	8:53	9:23	9:53
Bonita Del Oro	18	6:14	6:14	5:14	5:14	6:46	7:26	7:56	8:26	8:56	9:26	9:56
College Boulevard	17	6:17	6:17	5:17	5:17	6:49	7:29	7:59	8:29	8:59	9:29	9:59
Melrose Drive	17	6:22	6:22	5:22	5:22	6:54	7:34	8:04	8:34	9:04	9:34	10:04
Vista Transit Center	17	6:26	6:26	5:26	5:26	6:58	7:38	8:08	8:38	9:08	9:38	10:08
Civic Center-Vista	17	6:29	6:29	5:29	5:29	7:01	7:41	8:11	8:41	9:11	9:41	10:11
Melrose Entry	17	6:35	6:35	5:35	5:35	7:07	7:47	8:17	8:47	9:17	9:47	10:17
College Boulevard	17	6:40	6:40	5:40	5:40	7:12	7:52	8:22	8:52	9:22	9:52	10:22
Bonita Del Oro	17	6:43	6:43	5:43	5:43	7:15	7:55	8:25	8:55	9:25	9:55	10:25
El Camino Real	17	6:46	6:46	5:46	5:46	7:18	7:58	8:28	8:58	9:28	9:58	10:28
Crest Street	17	6:49	6:49	5:49	5:49	7:21	8:01	8:31	9:01	9:31	10:01	10:31
Coast Highway	17	6:52	6:52	5:52	5:52	7:24	8:04	8:34	9:04	9:34	10:04	10:34
Oceanside Transit Center	17	6:56	6:56	5:56	5:56	7:28	8:08	8:38	9:08	9:38	10:08	10:38

MidCoastCorridor "BlueLine Trolley Extension" Project Costs.

The documents may indicate the project construction is complete by 2023, and the fta money has been received by then. Why does SanDag want to continue borrowing money in 2024 and 2026? if the cost of the project is only \$1.1 billion. Of concern is that Prop A says that if alternative funding sources are available, then Prop A money should not be used.

Based on guidance received during FTA's assessment of the project's Preliminary Engineering Financial Plan, the annual amount of Section 5309 New Starts funding is currently assumed to be limited to a maximum of \$100 million per year. To help address the resulting shortfall in capital that this annual limit imposes on the financial plan during construction, the plan includes GANs as a form of debt that would be secured by FTA New Starts revenues. The plan assumes that \$550 million in GANs are issued in FY 2016, at the start of peak construction activities, at a 4 percent interest rate and with a 7-year maturity. In the event that FTA is able to provide more than \$100 million per year, the cost of financing the project with GANs can be reduced. Final agreement on a schedule of annual New Starts payments will be part of the FFGA negotiations.

The annual principal amount associated with the GANs is paid from annual FTA New Starts appropriations. The remaining amount of annual New Starts funds (net of GANs principal repayment) is then used toward project capital expenses. Proceeds from the FY 2016 GANs issuance are drawn-down between FY 2016 and FY 2018. In each of these years, the total amount of GANs and FTA New Starts funds (net of GANs principal repayment) does not exceed an assumed share of 80 percent of total project costs in that year.

In addition to GANs and FTA New Starts funds, the project draws down on a total of \$1,068.7 million (YOE dollars) from the *TransNet* sales tax program in the form of capital revenues and bond proceeds.

TransNet capital revenues are used to pay for all project expenses between FY 2011 and FY 2014. Between FY 2015 and FY 2023, *TransNet* capital revenues are used to pay for at least 50.6 percent (local share) of the annual project finance charges. This is consistent with SANDAG's practice of using capital revenues to first pay off annual debt service amounts. To meet the requested 48.4 percent federal share, more federal funding is available between FY 2024 and FY 2026 than is needed to pay for finance charges in those years. The balance of those New Starts funds, in the amount of \$147.5 million, is used to reimburse the *TransNet* program.

Finally, *TransNet* bond proceeds are used to bridge the remaining gap in project funding in each year. SANDAG's Plan of Finance includes planned bond issuances every other year between FY 2015 and FY 2029 to provide funding for the entire *TransNet* program. The financial plan assumes that some bond proceeds from the following three planned debt issuances will be used for project capital funding, as described below:

- \$228.0 million in proceeds from the FY 2015 debt issuance (total issuance amount of \$354.4 million at a 4.0 percent interest rate and a 30-year maturity)

6) What happens if funds become available for the same purpose with Proposition A?

Am I reading the following correctly? Proposition A, Imposition of Transportation and Use Tax terms, that "the tax is to be reduced by the Commission if additional state or federal funds become available for the same purpose". See Item 3:

ALPHABET SOUP
A PRIMER ON
TRANSPORTATION FUNDING
IN THE SAN DIEGO REGION

SEPTEMBER 2007



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Appendix B - Section by Section Analysis of the Original Transfer and Transfer Extension Ordinances

Section	Major Provisions
1. ORIGINAL TRANSFER ORDINANCE (1997)	<p>1. To stabilize and improve the safety of streets and road maintenance-related projects.</p> <p>2. To provide for the development of a set of projects and programs for ultimate approval by the Commission, including:</p> <ul style="list-style-type: none"> - \$200 million for local street habitat mitigation and \$50 million for economic development; - \$250 million for street construction program. <p>3. This section consolidates the above mentioned environmental mitigation funds for \$1.5 billion for habitat-related environmental mitigation activities including project acquisition and management to reduce blight costs and increase safety.</p> <p>4. Two percent of the total transfer shall be reserved for the Bicycle, Pedestrian, and Neighborhood Safety Program to be allocated to the following activities:</p> <ul style="list-style-type: none"> - In the amount of total transfer made available for bicycle safety-related projects. <p>5. \$10,000,000 per year subject to future inflation's set aside for operation of TOC.</p>
2. AMORTIZATION OF TRANSFERS AND USE TAX	<p>1. This section cites the legal context for establishing a one-half of one percent 20-year sales tax (Revenue and Taxation Code and Public Utilities Code).</p> <p>2. The tax is to be reduced by the Commission if additional state or federal funds become available for the same purposes.</p> <p>3. This section provides that the Board of Equalization may be authorized to provide for the transfer of funds.</p> <p>4. The proposed transfer and extension with the commission from the original Proposition 130 with the 2002 Revenue and Taxation Code amendments, Proposition 130, and Regional Transportation Commission's 2002-2003 Administrative Code and the 2003 annual local fiscal budget and the 2003</p>
3. AMORTIZATION OF TRANSFERS AND USE TAX	<p>1. This section cites the legal context for establishing a one-half of one percent 20-year sales tax (Revenue and Taxation Code and Public Utilities Code).</p> <p>2. The tax is to be reduced by the Commission if additional state or federal funds become available for the same purposes.</p> <p>3. This section provides that the Board of Equalization may be authorized to provide for the transfer of funds.</p> <p>4. The proposed transfer and extension with the commission from the original Proposition 130 with the 2002 Revenue and Taxation Code amendments, Proposition 130, and Regional Transportation Commission's 2002-2003 Administrative Code and the 2003 annual local fiscal budget and the 2003</p>
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3.3.1.1 TransNet Projects

The *TransNet* Extension Ordinance sets forth the major projects and programs that will be delivered under the *TransNet* program. The Mid-Corridor Transit Project is included as part of the Congestion Relief Program—Major Transportation Corridor Improvements with a target *TransNet* funding amount of \$650 million in 2002 dollars.

I am somewhat concerned the timing of the closure of the previously existing University City Community Coaster Station Service discontinuance a few years ago. This closure of the station seemed to correspond very closely with the current planning for the MidCoast Corridor/ trolley light rail proposal.

7) Why was the previously existing UCCP area Coaster Station closed?

8) Where was this station located?

9) Has SANDAG and NCTD studied the possibility of establishing a large transit station to be shared by the Sorrento Valley and University City Community Planning areas?

You may want to consider constructing a second rail station at Sorrento Valley Road and Roselle Street just south of Sorrento Valley Road. The station will also serve residents going home or to work and employees commuting to the community to work at the major employers located in the area. These stations will provide convenient transit access to serve the major employers and major neighborhoods in the Sorrento Valley and University City community area. Locating a new/additional station within a reasonable distance of the existing Sorrento Valley Station so just 1 train stop would suffice for Coaster/Amtrak at both the north and south station with the train straddling Sorrento Valley Road. This may accommodate simultaneous departures and boardings serving the major employers in both communities. One station would serve University City and the other will serve Sorrento Valley. The University City riders may be delivered to University City via shuttle, bus, battery operated trolley, or via trams up the hill to the community. The new station may be constructed within walking distance of a new parking garage, easy freeway on-off ramps to the garage similar to the one constructed by MTS at the SEC Interstate 15 and Ted Williams Parkway which serves the communities of Rancho Pensacitos and Sabre Springs.

If there is not enough land in the existing location for a major parking garage and easy I-805/ I-5 access ramps, you may consider locating the rail station at the southern end of Roselle Street, thus providing transit and parking to both communities.

10) Why does SANDAG 2016 budget show this project cost \$1.6+ Billion and whereas the MidCoast Corridor EIR cost is \$2.1 Billion?

Personally, I think just paying for the project as the funds become available is the best way to go. Financing over a 40 year period seems somewhat of a burden on the future generation. Constructing the project as the money

becomes available should eliminate the need for borrowed funds and increasing interest rates and will allow for building in stages, i.e., Clairmont, Balboa, etc..



4.0 CAPITAL COST ESTIMATE

Table 4-1 summarizes capital costs for the Refined Build Alternative. Table 4-2 shows the detailed capital cost estimate for the Refined Build Alternative.

Table 4-1. Summary of the Capital Cost for the Refined Build Alternative

	Refined Build Alternative \$'000
10-10 Construction Subtotal	\$753,608
60 ROW, Land, Existing Improvements	\$145,853
70 Vehicles	\$169,742
80 Professional Services	\$290,453
90 Unallocated Contingency	\$129,211
Subtotal: Base Year (2013) Dollars Total	\$1,490,326
Subtotal: YOE Dollars Total	\$1,987,721
100 Finance Charges-Base Year (2013)	\$346,289
100 Finance Charges-YOE	\$424,304
Base Year (2013) Dollars Total	\$1,836,615
YOE Dollars Total	\$2,412,115

Source: SANDAG, 2014

Table 4-2. Mid-Coast Capital Cost Estimate - Refined Build Alternative

MAIN WORKSHEET - REFINED BUILD ALTERNATIVE (Rev. 15, August, 2013)
 Refined Build Alternative (Final SEIS/SIEP) (Using SANDAG Fiscal Year) Today's Date 1/15/14
 Mid-Coast Corridor Transit Project, San Diego, California Yr of Base Year \$ 2013
 Yr of Revenue Ops 2016

	Quantity	Base Year Dollars w/o Contingency (X'000)	Base Year Dollars Allocated Contingency (X'000)	Base Year Dollars TOTAL (X'000)	Base Year Dollars Unit Cost (X'000)	Base Year Dollars Percentage of Construction Cost	Base Year Dollars Percentage of Total Project Cost	YOE Dollars Total (X'000)
10 GUIDEWAY & TRACK ELEMENTS (route miles)	10.93	270,884	61,183	332,073	\$30,382	44%	18%	381,498
10.01 Guideway: At-grade exclusive right-of-way	1.71	13,339	3,305	17,248	\$10,087			19,815
10.02 Guideway: At-grade/semi-exclusive (allows cross-traffic)				0				0
10.03 Guideway: At-grade in mixed traffic				0				0
10.04 Guideway: Aerial structure	4.04	123,625	33,295	167,221	\$41,391			182,110
10.05 Guideway: Built-up box				0				0
10.06 Guideway: Underground cut & cover	0.04	5,799	1,610	5,408	\$210,225			9,661
10.07 Guideway: Underground tunnel				0				0
10.08 Guideway: Retained cut or fill	1.14	55,768	11,140	66,348	\$12,008			76,223
10.09 Track: Direct fixation		27,785	5,654	33,321				38,281
10.10 Track: Embedded				0				0
10.11 Track: Ballasted		22,095	4,641	28,847				30,843
10.12 Track: Special (switches, turnouts)		9,598	1,398	10,807				12,415
10.13 Track: Vibration and noise dampening		1,440	432	1,872				2,151
20 STATIONS, STOPS, TERMINALS, INTERMODAL (number)	9	87,374	10,807	163,984	\$11,853	14%	0%	122,182
20.01 At-grade station, stop, shelter, mall, terminal, platform	4	12,339	2,054	14,003	\$3,651			17,159
20.02 Aerial station, stop, shelter, mall, terminal, platform	5	47,405	10,439	57,843	\$11,569			67,968
20.03 Underground station, stop, shelter, mall, terminal, platform				0				0
20.04 Other stations, landings, terminals: intermodal, ferry, trolley, etc.				0				0
20.05 Joint development				0				0
20.06 Automobile parking multi-story structure		17,700	2,656	20,655				24,270
20.07 Elevators, escalators		5,730	1,151	10,881				12,785
30 SUPPORT FACILITIES: YARDS, SHOPS, ADMIN. BLDGS	11	0	0	0	\$0	0%	0%	0
30.01 Administration Building: Office, sales, storage, revenue counting				0				#DIV/0!
30.02 Light Maintenance Facility				0				#DIV/0!
30.03 Heavy Maintenance Facility				0				#DIV/0!
30.04 Storage or Maintenance of Way Building				0				#DIV/0!
30.05 Yard and Yard Track				0				#DIV/0!

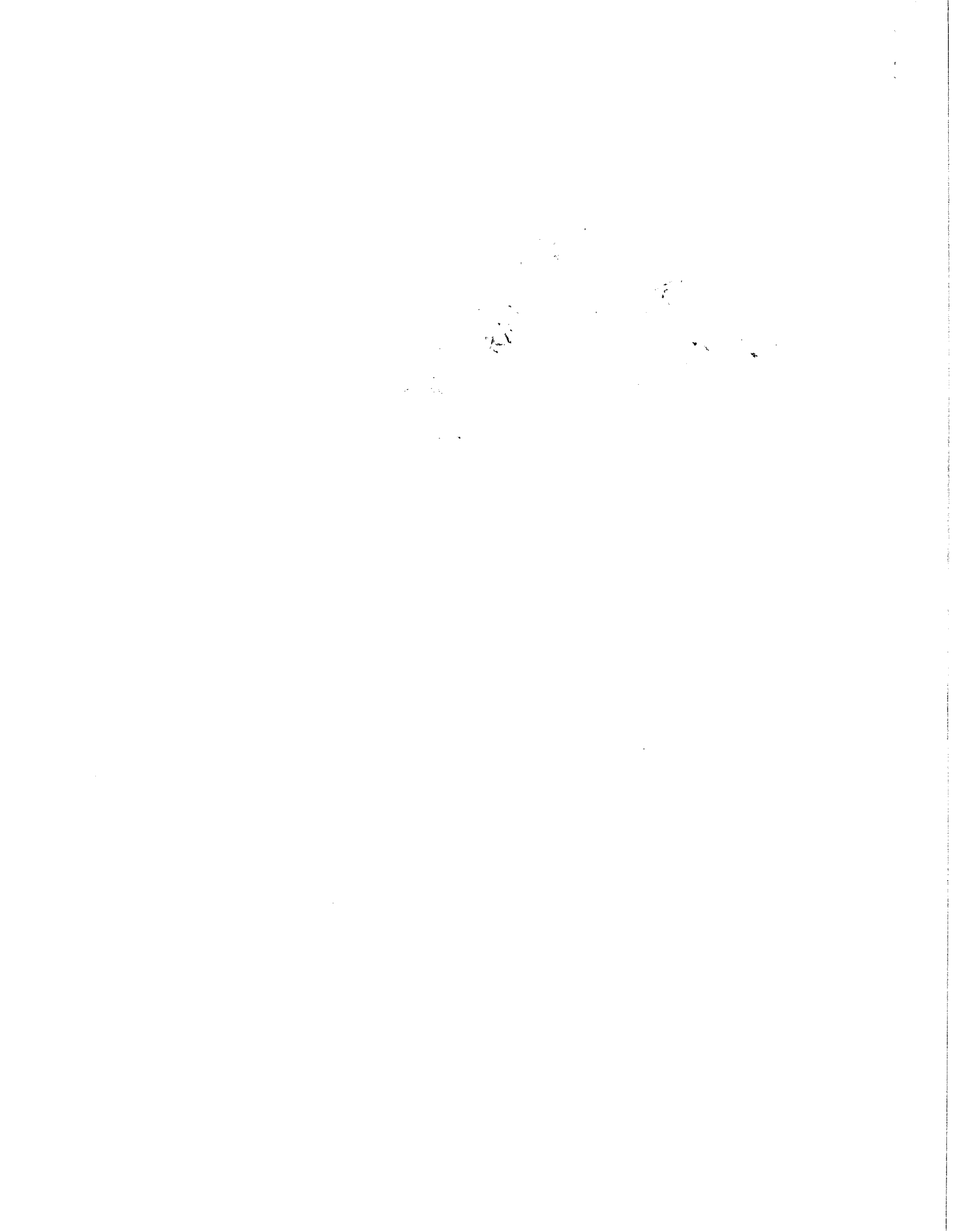
40 SITEWORK & SPECIAL CONDITIONS	11	155,511	32,383	187,694	\$17,191	25%	10%	214,058
40.01 Demolition, Clearing, Earthwork		1,402	204	1,606				1,932
40.02 Site Utilities, Utility Relocation		37,165	9,300	46,465				52,867
40.03 Haz. mat'l, contam'd soil removal/mitigation, ground water treatment		4,400	1,320	5,720				6,516
40.04 Environmental mitigation, e.g. wetlands, historic/archeologic, parks		9,894	2,737	12,658				14,452
40.05 Site structures including retaining walls, sound walls				0				0
40.06 Pedestrian / bike access and accommodation, landscaping		3,885	1,027	4,912				5,508
40.07 Automobile, bus, van access ways including ramps, parking lots		37,773	7,122	38,895				45,450
40.08 Temporary Facilities and other indirect costs during construction		86,058	10,523	76,581				87,244
50 SYSTEMS	11	105,959	24,000	130,019	\$11,895	17%	7%	151,847
50.01 Train control and signals		31,055	7,505	39,152				45,772
50.02 Traffic signals and crossing protection		6,145	1,536	7,681				8,971
50.03 Traction power supply: substations		38,909	7,047	45,957				53,672
50.04 Traction power distribution: catenary and third rail		17,732	4,528	22,258				25,995
50.05 Communications		7,105	2,131	9,237				10,788
50.06 Fare collection system and equipment		3,380	1,014	4,394				5,132
50.07 Central Control		1,000	300	1,300				1,518
Construction Subtotal (10 - 50)	3	613,727	134,240	753,968	\$68,981	100%	41%	866,584
60 ROW, LAND, EXISTING IMPROVEMENTS	11	93,429	52,524	145,953	\$13,353		8%	155,158
60.01 Purchase or lease of real estate		0	429	52,224	143,683			152,711
60.02 Relocation of existing households and businesses		2,000	300	2,300				2,445
70 VEHICLES (number)	36	161,550	8,083	169,742	\$4,715		9%	195,705
70.01 Light Rail	36	147,273	7,354	154,637	\$4,295			178,291
70.02 Heavy Rail				0				0
70.03 Commuter Rail				0				0
70.04 Bus				0				0
70.05 Other				0				0
70.06 Non-revenue vehicles				0				0
70.07 Spare parts		14,288	719	15,105				17,415
80 PROFESSIONAL SERVICES (applies to Cmts. 10-50)	11	243,044	48,408	280,453	\$26,574	39%	16%	319,045
80.01 Project Development		80,000	16,000	96,000				105,450
80.02 Engineering		35,000	7,000	42,000				46,134
80.03 Project Management for Design and Construction		30,986	6,197	37,184				40,844
80.04 Construction Administration & Management		61,973	12,395	74,357				81,608
80.05 Professional Liability and other Non-Construction Insurance		6,197	1,239	7,437				8,169
80.06 Legal: Permits, Review Fees by other agencies, cities, etc.		17,395	2,479	14,973				16,338
80.07 Surveys, Testing, Investigation, Inspection		6,197	1,239	7,437				8,169
80.08 Start-up		9,236	1,859	11,155				12,253
Subtotal (10 - 80)	3	1,116,358	243,256	1,360,115	\$126,439		74%	1,539,491

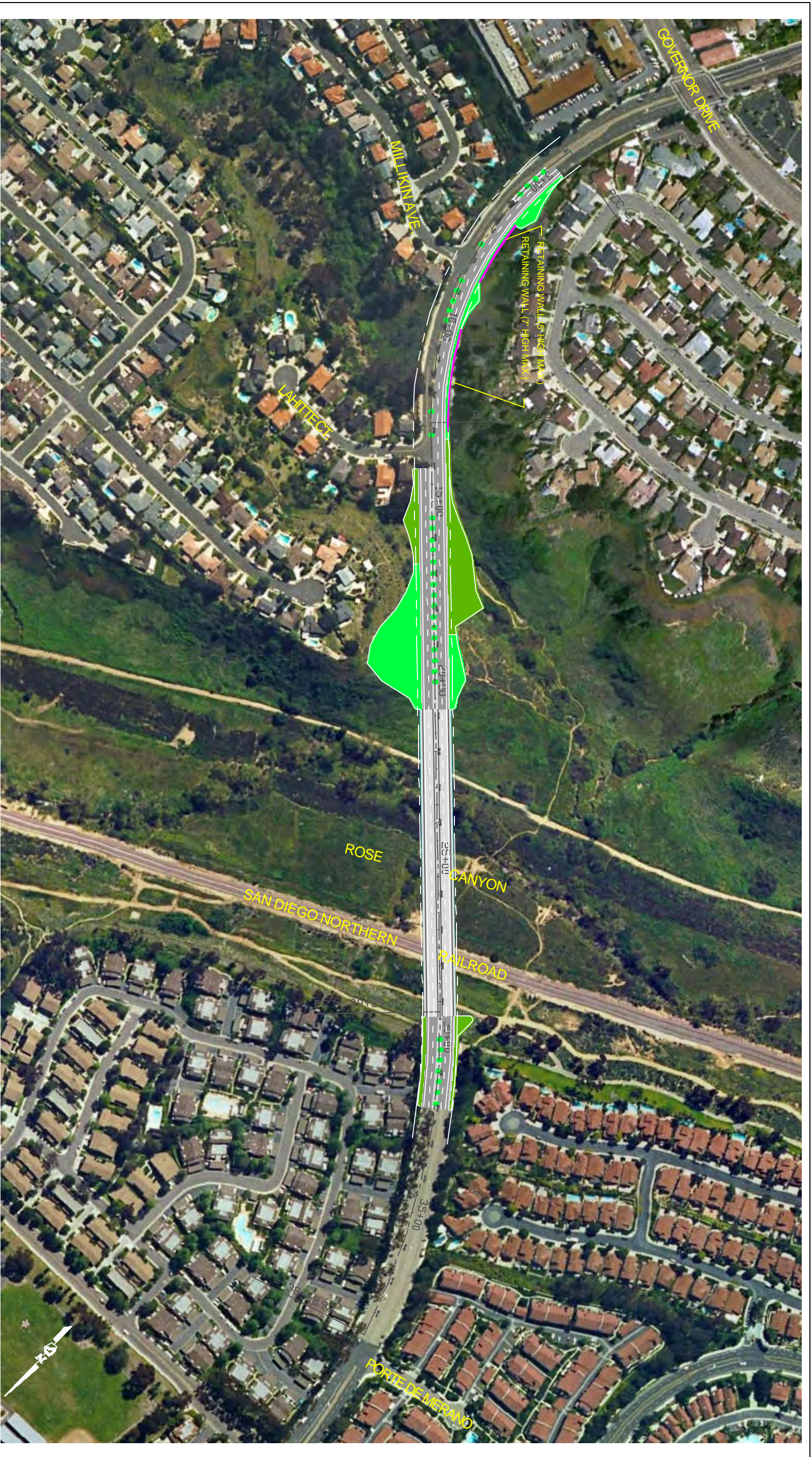
90 UNALLOCATED CONTINGENCY		129,211		7%	148,231
Subtotal (10 - 90)		1,489,325	\$135,260	81%	1,687,721
100 FINANCE CHARGES		348,269		19%	424,304
Total Project Cost (10 - 100)		1,838,598	\$169,216	100%	2,112,115
Allocated Contingency as % of Base Yr Dollars w/o Contingency		21.75%			
Unallocated Contingency as % of Base Yr Dollars w/o Contingency		11.57%			
Total Contingency as % of Base Yr Dollars w/o Contingency		33.35%			
Unallocated Contingency as % of Subtotal (10 - 60)		9.50%			
YCE Construction Cost per Mile (X300)					579,569
YCE Total Project Cost per Mile Not Including Vehicles (X300)					\$175,335
YCE Total Project Cost per Mile (X300)					\$193,240

MID-COAST CORRIDOR TRANSIT PROJECT

August 2014

4-3



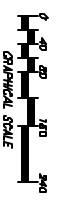


REGENTS ROAD BRIDGE

SCALE: 1"=80'

LEGEND

	BRIDGE SPAN
	ROAD PAVEMENT
	SIDEWALK
	MEDIAN
	RETAINING WALL
	RIGHT OF WAY
	FILL SLOPES
	CUT SLOPES



GRAPHICAL SCALE

Project Design Consultants
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Relative Sensitivities of Mammalian Carnivores to Habitat Fragmentation

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Abstract: *I examined the effects of habitat fragmentation on the distribution and abundance of mammalian carnivores in coastal southern California and tested the prediction that responses to fragmentation varied with the body size of carnivore species. I conducted track surveys for nine native and two exotic carnivore species in 29 urban habitat fragments and 10 control sites. Fragment area and isolation were the two strongest landscape descriptors of predator distribution and abundance. Six species were sensitive to fragmentation, generally disappearing as habitat patches became smaller and more isolated; three species were enhanced by fragmentation, with increased abundance in highly fragmented sites; and two species were tolerant of fragmentation, with little to no effect of landscape variables on their distribution and abundance. Within urban habitat fragments, the carnivore visitation rate increased at sites with more exotic cover and closer to the urban edge, a pattern driven largely by the increased abundance of fragmentation-enhanced carnivores at edge sites. Finally, body size, in conjunction with other ecological characteristics, partially accounted for the heterogeneity in responses to fragmentation among carnivore species. These differential sensitivities are useful criteria for choosing appropriate focal species for ecological research and conservation planning, a choice that depends on the scale of fragmentation in a region and the commensurate responses of carnivore populations at that scale.*

Sensibilidad Relativa a la Fragmentación del Hábitat de Mamíferos Carnívoros

Resumen: *Examiné los efectos de la fragmentación del hábitat sobre la distribución y abundancia de mamíferos carnívoros en la costa del sur de California y evalué la predicción de que las respuestas a la fragmentación variaban con el tamaño corporal de carnívoros. Se realizaron muestreos de huellas para nueve especies nativas y dos exóticas en 29 fragmentos de hábitat urbano y 10 sitios control. El área fragmentada y su aislamiento fueron los dos principales descriptores de la distribución y abundancia de depredadores. Seis especies fueron sensibles a la fragmentación, generalmente las especies desaparecían conforme los fragmentos eran más pequeños y aislados, tres especies fueron favorecidas por la fragmentación, con incremento en su abundancia en sitios altamente fragmentados, y dos especies fueron tolerantes a la fragmentación con poco o ningún efecto de las variables del paisaje sobre su distribución y abundancia. Dentro de los fragmentos de hábitat urbano, las tasas de presencia de carnívoros incrementaron en sitios con mayor cobertura exótica y cercanos al borde urbano, un patrón dirigido principalmente por el incremento en la abundancia de carnívoros favorecidos por la fragmentación en el borde de los sitios. Finalmente, el tamaño corporal, conjuntamente con otras características ecológicas, fueron parcialmente responsables de la heterogeneidad en respuestas a la fragmentación entre especies de carnívoros. Estas sensibilidades diferenciales son un criterio útil para seleccionar especies focales apropiadas para investigaciones ecológicas y la planeación de la conservación, una selección que depende de la escala de fragmentación en una región y de las respuestas apropiadas de las poblaciones de carnívoros a esa escala.*

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Introduction

The destruction of habitat has been targeted as one of the most serious threats to biological diversity world-

wide (Wilcove et al. 1998), and in areas with increasing urbanization, the loss and fragmentation of habitat is virtually inevitable. Mediterranean scrub habitats in coastal southern California are particularly threatened. Intensive development in the region over the past century has destroyed all but 10% of the native coastal sage scrub habitat (McCaul 1994). This habitat loss has created a "hotspot" of endangerment and extinction for the highly endemic biota in the region (Dobson et al. 1997). Mammalian carnivores are thought to be particularly vulnerable to local extinction in fragmented landscapes because of their relatively large ranges, low numbers, and direct persecution by humans (Noss et al. 1996; Woodroffe & Ginsberg 1998). The decline and extirpation of top predators from fragmented systems may generate trophic cascades that alter the structure of ecological communities (Crooks & Soulé 1999). Indeed, the persistence of these environmentally sensitive and ecologically pivotal species may be indicative of the integrity of entire ecosystems (Noss et al. 1996). As such, mammalian carnivores can serve as useful tools for the study of ecological disturbances or for conservation planning and reserve design (Soulé & Terborgh 1999).

Mammalian predators are difficult to study, however, because of their low densities, nocturnal and secretive habits, and wariness of humans (Sargeant et al. 1998). As a result, the ecology of many carnivore species and their responses to ecological disturbances such as fragmentation are often poorly understood. Although considered members of the same ecological guild, carnivores may vary in their responses to fragmentation. In particular, differences in body size among carnivore species have been proposed as an important determinant of extinction probability (Brown 1986; Belovsky 1987). The relationship between body size and extinction risk in animals is complex, however, and has been the subject of considerable debate, with studies predicting and reporting positive, negative, or no relation of body size to extinction probability (reviewed by Johst & Brandl 1997). Few studies have evaluated if, how, or why carnivore species differ in their relative sensitivities to fragmentation effects.

My goal was to analyze the effects of the loss and fragmentation of habitat on mammalian carnivores in the urbanizing landscape of coastal southern California. Habitat fragmentation must be viewed as a multiscale problem, with fragmentation effects depending on the scale of fragmentation and the movement patterns of target species (Andren 1994). I therefore surveyed a suite of carnivore species that occur across a range of fragmentation levels and evaluated their responses to fragmentation at two spatial scales: (1) landscape-level heterogeneity among fragments and (2) local heterogeneity at sites within fragments. To allow for a more comprehensive assessment of relative sensitivities to fragmentation, I not only documented the presence or absence of

each carnivore species, but also measured their relative abundance at each site. Finally, I tested the prediction that responses to fragmentation vary with body size in carnivore species, explored other ecological traits of these predators that may contribute to extinction risk, and used these differential sensitivities to evaluate the utility of mammalian carnivores as focal species with which to assess the degree of functional landscape connectivity.

Methods

Study Areas

I conducted carnivore surveys in 29 urban habitat fragments in coastal San Diego County from Fall 1995 through Summer 1997. Twenty-eight of these fragments were originally studied by Soulé et al. (1988). The fragments, completely surrounded by human-modified landscapes, are typically dendritic canyons dissecting coastal mesas, although a few also contain mesa-top habitat. The fragments support a mosaic of shrub habitat, including mixed chaparral, chamise chaparral, maritime succulent shrub, and coastal sage scrub, the dominant assemblage in most sites. Disturbed areas within fragments were typically dominated by ruderal weed species, ornamental plants invading from surrounding residences, fire-retardant ground cover such as South African ice-plant (*Carpobrotus edulis*), and non-native trees (e.g., palms and species of *Eucalyptus* and *Acacia*) (Alberts et al. 1993).

From Fall 1995 through Summer 2000, I conducted carnivore surveys in less disturbed areas in coastal southern California to act as controls to the small, urban habitat remnants. These control areas varied in size and degree of isolation (Table 1), ranging from relatively small reserves isolated within urban developments (e.g., Point Loma Ecological Reserve) to large blocks of habitat relatively continuous with larger natural areas (e.g., Miramar Marine Corps Air Station).

Carnivore Surveys

I assessed the distribution and relative abundance of nine native and two non-native predator species through track surveys. Native species were the mountain lion (*Felis concolor*), bobcat (*Felis rufus*), coyote (*Canis latrans*), gray fox (*Urocyon cinereoargenteus*), badger (*Taxidea taxus*), raccoon (*Procyon lotor*), striped skunk (*Mephitis mephitis*), western spotted skunk (*Spilogale gracilis*), and long-tailed weasel (*Mustela frenata*). Non-native target species were the domestic cat (*Felis catus*) and Virginia opossum (*Didelphis virginiana*), a marsupial introduced to California around 1910 (Jameson & Peeters 1988).

Table 1. Landscape variables and distributions of 11 mammalian carnivore species for 10 control sites and 29 urban habitat fragments in coastal southern California (1, present; 0, absent).

	Area (ha)	Age (yrs)	Distance Y (m)	Distance Z (m)	Long-tailed weasel	Spotted skunk	Badger	Mountain lion	Bobcat	Coyote	Gray fox	Striped skunk	Raccoon	Opossum	Domestic cat
Control sites															
Miramar Marine Corps Air Station	5806	0	0	0	0	0	0	1	1	1	0	1	1	1	0
Chino Hills State Park	4452	0	200	200	1	0	1	1	1	1	1	1	1	1	0
Limestone Canyon/Whiting Ranch	4450	0	15	15	0	0	1	1	1	1	1	1	1	1	0
San Joaquin Hills	4219	22	5353	2930	0	1	0	0	1	1	1	1	1	1	0
Weir Canyon	1923	0	69	69	0	0	0	1	1	1	1	1	0	1	0
Santa Margarita Ecological Reserve	1763	0	30	30	0	0	0	1	1	1	1	0	1	0	0
Starr Ranch	1548	0	0	0	0	1	0	1	1	1	1	1	1	1	0
Tenaja	1191	0	0	0	1	0	1	1	1	1	1	1	1	1	0
Torrey Pines State Reserve	428	0	68	68	0	0	0	1	1	1	1	1	1	1	0
Point Loma Ecological Reserve	264	45	5700	5700	0	0	0	0	0	1	1	1	1	0	1
Urban fragments															
Florida	102	59	2100	233	0	0	0	0	0	1	1	0	0	0	0
Torrey Pines Extension	74	20	91	91	0	0	0	0	1	1	1	1	1	1	1
Balboa Terrace	56	43	121	117	0	0	0	0	0	1	1	1	1	1	1
Alta La Jolla	34	23	121	93	0	0	0	0	0	1	1	1	1	1	1
Kate Sessions	31	25	121	93	0	0	0	0	0	1	1	1	1	1	1
Zena	15	45	2865	467	0	0	0	0	0	1	1	1	0	1	1
Canon	12	67	1219	1167	0	0	0	0	0	0	1	1	1	1	1
Laurel	10	88	1554	350	0	0	0	0	0	1	1	1	1	1	1
32nd Street South	10	65	304	233	0	0	0	0	0	1	0	0	0	0	1
Pottery	10	23	45	70	0	0	0	0	0	1	1	1	1	1	0
Washington	9	83	365	187	0	0	0	0	0	1	1	1	1	1	1
Syracuse	9	27	40	70	0	0	0	0	0	1	1	1	0	1	1
Baja	8	40	670	70	0	0	0	0	0	1	1	1	1	1	1
Raffee	8	28	61	163	0	0	0	0	0	1	1	1	1	1	1
Solana	8	20	550	187	0	0	0	0	0	1	1	0	1	1	0
Acuna	7	31	110	47	0	0	0	0	0	1	1	1	0	1	1
Juan	7	32	228	70	0	0	0	0	0	1	1	1	1	1	1
Chollas	6	45	1005	467	0	0	0	0	0	1	1	1	1	1	1
Mil Cumbres	6	20	550	23	0	0	0	0	0	1	1	1	0	1	1
Chateau	6	29	110	47	0	0	0	0	0	1	1	0	0	1	1
Oak Crest	6	15	400	140	0	0	0	0	0	1	0	0	0	1	1
54th	4	29	609	187	0	0	0	0	0	1	1	1	1	1	1
60th	4	46	335	350	0	0	0	0	0	1	0	0	0	1	0
Spruce	4	95	1767	93	0	0	0	0	0	1	1	1	1	1	1
Titus	3	86	280	163	0	0	0	0	0	1	1	1	1	1	1
Montanosa	3	11	91	93	0	0	0	0	0	1	0	0	0	1	1
El Mac	2	41	883	163	0	0	0	0	0	1	1	1	1	0	1
Poinsettia	2	59	350	350	0	0	0	0	0	0	1	0	1	1	1
Talbot	2	64	1219	933	0	0	0	0	0	0	1	1	1	1	1
Urban fragment occupancy					2	2	3	7	11	26	25	21	19	26	25
Total occupancy					2	2	3	7	11	36	34	30	28	34	26

I established a series of track-detection stations at approximately 250-m intervals along dirt roads or trails (human and/or wildlife) along the main axis of each study area (Linhart & Knowlton 1975; Conner et al. 1983; Sargeant et al. 1998). Each track station consisted of a 1-m-diameter, 1-cm-deep, circle of freshly sifted gypsum baited with a liquid carnivore scent lure (Russ Carman's Pro-Choice and Canine Call, Sterling Fur & Tool, Sterling, Ohio) every other day. Track transects were checked and reset daily for 5 consecutive days. Tracks on each station were measured and identified to species; tracks with ambiguous identifications were omitted from analyses. Track surveys were conducted once each sampling quarter: fall (September–November), winter (December–February), spring (March–May), and summer (June–August). Each site was sampled for 1–2 years.

The track index of each carnivore species in each quarterly sampling session was expressed as the total number of visits recorded for a species, divided by the total sampling effort. I defined a visit as at least one track of a species on a track station (Conner et al. 1983). Mathematically, the track index (I) was calculated as

$$I = \ln[\{v_j/(s_j n_j)\} + 1],$$

where v_j is the number of stations visited by a species in transect j , s_j is the number of stations in transect j , and n_j is the number of nights that stations were operative in transect j . Thus, I for each species represents the visitation rate per track station per night in each study area. Although this index cannot be directly translated into numbers of individuals and hence does not measure absolute densities, it does provide an index of the relative abundance of a species at each sampling point (Conner et al. 1983; Sargeant et al. 1998). For each species, I averaged track indices across quarterly sampling sessions to derive a mean index at each study area for the duration of the study. Indices were log-transformed to meet normality assumptions in the statistical analyses. Overall, track surveys totaled 6540 station-nights ($s_j n_j$) among all study sites.

Landscape Variables

I used area, age, and isolation to assess the effects of landscape-level fragmentation on carnivore populations (Table 1). I measured the total area of each fragment based on digitized images of scaled aerial photographs taken in 1995. Total area of each control site was defined as the reserve boundaries within which the surveys were conducted. Because control sites were often adjacent to unfragmented habitat, area approximations represent minimum estimates.

Fragment age, defined as the number of years since isolation of the habitat fragment by urban development, was based on dated aerial photographs and building permit records (Soulé et al. 1988). Because fragment age is

highly negatively correlated to the proportion of native shrub cover within fragments (Suarez et al. 1998; Crooks et al. 2001), I used age to measure a time effect per se in the fragments and to represent the cumulative loss of native habitat in the entire fragment since isolation. Age was scored as zero for control sites that were directly adjacent to larger natural areas (Miramar Marine Corps Air Station, Starr Ranch Audubon Sanctuary, Tenaja Corridor) or that were separated from such areas by only a roadway and not by urban development (Chino Hills State Parks, Limestone Canyon/Whiting Ranch, Santa Margarita Ecological Reserve, Torrey Pines State Reserve, Weir Canyon).

Two variables were calculated to characterize the degree of isolation of each site: distance Y , the distance to the closest habitat patch (measured from patch edge to patch edge) of equal or larger size (Soulé et al. 1988), and distance Z , the shortest distance to any other habitat fragment, reserve, or possible movement linkage to such sites (e.g., riparian channels, power line easements, golf courses). Isolation was scored as zero for control sites directly adjacent to a larger natural area and as the width of the roadway for control sites isolated from larger habitat blocks by a roadway.

All landscape variables were log-transformed to meet normality assumptions in the statistical analyses. When only the urban habitat fragments were considered, fragment age was positively related to distance Y ($r = 0.564$, $p = 0.001$) and distance Z ($r = 0.526$, $p = 0.003$), and distance Y was positively related to distance Z ($r = 0.362$, $p = 0.053$). When both habitat fragments and control areas were included, area was negatively related to age ($r = -0.813$, $p < 0.001$), distance Y ($r = -0.467$, $p = 0.003$), and distance Z ($r = -0.299$, $p = 0.065$); age was positively related to distance Y ($r = 0.741$, $p < 0.001$) and distance Z ($r = 0.597$, $p < 0.001$); and distance Y was positively related to distance Z ($r = 0.761$, $p < 0.001$).

SPECIES RICHNESS AND DISTRIBUTION

Island biogeography theory predicts that landscape variables such as size and isolation should help determine the number of species on islands (MacArthur & Wilson 1967). To test this prediction, I calculated two measures of carnivore species richness for each study area: (1) the number of carnivore species detected at the site during the course of the study and (2) the number of native carnivore species detected, excluding the non-native opossum and domestic cat. A species was present in a study area if it was detected on track stations within the site at least once during the course of the study. Presence was verified with a combination of remotely triggered cameras, scat surveys, and opportunistic visual sightings. Presence of a species does not necessarily imply that the site can support resident animals or populations. Like-

wise, failure to detect a species at a site does not indicate that the species has never visited the area, but rather that it was not recorded during sampling sessions.

I used backward-elimination multiple regression to identify which landscape variables (size, age, and isolation) were the best predictors of carnivore species richness in a study site. Independent variables with $p < 0.15$ were included in all regression models to minimize exclusion of important predictors from the model, and tolerance values were set at 0.10 throughout to control for multicollinearity (Tabachnick & Fidell 1996). Comparison-wide error rates were examined in all statistical analyses (Mead 1988; Stuart-Oaten 1995) ($p < 0.05$, statistically significant; $0.05 < p < 0.10$, marginally significant). I first conducted the multiple-regression analyses including only the 29 urban habitat fragments and then including all 39 study sites.

I used logistic-regression analyses to evaluate the effect of landscape variables on the distribution of individual carnivore species. First, I constructed bivariate logistic-regression models to evaluate the separate effects of area and isolation (distance Z) on the probability of occurrence for each species across all 39 study sites. Area and distance Z were chosen because preliminary analyses indicated that they were the two strongest predictors of carnivore distribution. For species with significant area and isolation effects, I plotted logistic-regression curves of the probability of occurrence of each species as a function of area, holding isolation constant by substituting its median value into a two-way (area \times isolation) logistic model. Likewise, I constructed isolation curves after holding area constant by substituting its median value into the two-way logistic model. From these curves, I calculated the area and isolation at which the probability of occurrence of the species equaled 50% and used these estimates to represent the relative area and isolation requirements for each species (following Crooks et al. 2001). Finally, I used multiple-logistic-regression models to graphically evaluate the combined effect of area and isolation on probability of occurrence for each species.

Logistic-regression estimates of probability of occurrences and relative area and isolation requirements are not intended, however, to represent the actual fragment size or isolation necessary to ensure the long-term persistence of a population (Hinsley et al. 1996). Rather, probability of occurrence measures the probability of an individual visiting the study area at least once during the course of the study, and the area and isolation estimates generated are intended to function only as relative indices of sensitivity to fragmentation. Area and isolation estimates are likely to be more accurate for those species with the most detections.

RELATIVE ABUNDANCE

I used backward-elimination regression models to identify which landscape variables were the best predictors

of the track indices of each species in each study area. The analyses were first conducted including only the 29 urban habitat fragments. Mountain lions, spotted skunks, badgers, and long-tailed weasels were omitted from these analyses because they were not detected in any urban habitat fragments. Bobcats, detected in only two fragments, were also omitted.

I repeated the multiple-regression analyses across all 39 fragments and control sites, including mountain lions and bobcats in the analyses. Spotted skunks, badgers, and long-tailed weasels were again omitted due to low detection rates. Because the track indices for mountain lions and bobcats were zero for many sites, the results of these regressions must be interpreted with caution. The final regression models were determined largely by the patterns of species' presence or absence across sites and not by variation in relative abundance among sites where they occurred. Nevertheless, I report regression models for mountain lions and bobcats to allow for further evaluation of the effects of landscape variables on these species and for further comparisons of their fragmentation sensitivities to those of other carnivore species.

Local Variables

Habitat heterogeneity within these urban habitat fragments is an important determinant of the persistence of native scrub-breeding birds (Soulé et al. 1988), rodents (Bolger et al. 1997), and invertebrates (Suarez et al. 1998; Bolger et al. 2000), all potential prey for carnivore species. I measured three variables to investigate the effect of habitat heterogeneity on carnivore populations: distance to the urban edge, percent cover of native shrubs, and percent cover of exotic vegetation. I estimated the distance of each track station to the nearest urban edge (the backyards of the houses bordering the fragment) and log-transformed these values to meet normality assumptions in the statistical analyses. I used a Braun-Blanquet categorical scale (Kent & Coker 1992) to estimate the percent cover of native shrubs and of total exotic cover within a 20-m radius around each track station. The cover scale was 0 (<1%), 1 (1–5%), 2 (6–25%), 3 (26–50%), 4 (51–75%), and 5 (76–100%). Distance to edge was positively related to shrub cover ($r = 0.281$, $p = 0.007$) and negatively related to exotic cover ($r = -0.341$, $p = 0.001$), and shrub cover was negatively related to exotic cover ($r = -0.694$, $p < 0.001$).

SPECIES RICHNESS AND RELATIVE ABUNDANCE

I calculated the total number of carnivore species and the number of native carnivore species detected at each track station in the 29 urban habitat fragments during the course of the study; two exotic species (opossum and domestic cat) and five native species (bobcat, coyote, gray fox, striped skunk, and raccoon) were detected

in the urban fragments and were hence included in the analyses. I then used backward-elimination multiple regression to identify which local variables were the best predictors of carnivore species richness at each station.

I calculated the mean track index for each species at each track station in the 29 urban habitat fragments to generate relative abundance indices. Again, mountain lions, spotted skunks, long-tailed weasels, badgers, and bobcats were omitted from these analyses due to low detection rates within fragments. I then used backward-elimination multiple regression to identify which local variables were the best predictors of the relative abundance of each species at a station. Some species were absent from some fragments, however, an absence driven in part by landscape variables such as area, age, and isolation. I therefore conducted the regressions for each species after excluding from the analyses all fragments where that species was never detected. By excluding these fragments I could account for the effects of landscape-level fragmentation on the presence or absence of a species and therefore more fully analyze the effects of local variables within fragments where that species occurred.

To further evaluate the effect of the urban edge on carnivores within fragments, for each species I graphed the mean track index at each station as a function of the distance of that station from the urban edge. Edge distances were classified into five categories: 0–24 m ($n = 14$ stations), 25–49 m ($n = 35$), 50–99 m ($n = 16$), 100–199 m ($n = 19$), and >200 m ($n = 7$). Direct comparisons of track indices between species can be misleading, because the response of species to track stations may differ (Conner et al. 1983; Sargeant et al. 1998). To allow for more meaningful comparisons of track indices, I standardized the index for each species by dividing each value by the maximum track index recorded for that species. Therefore, these standardized track indices for each species ranged on a scale of 0 to 1.

Body Size and Fragmentation Sensitivity

I evaluated the relationship between body mass and sensitivity to fragmentation among carnivore species through linear-regression analysis. As an index of sensitivity to fragmentation, I calculated the average area of study sites occupied by each species, multiplying the area of each study site by the standardized track index (scale 0 to 1) of that species at that site. With area weighted by relative abundance per sampling point, the indices accounted not just for occupancy but also for differences in the relative abundance of a species among study sites. For example, for a given species, some study sites supported resident populations, whereas other study sites were only visited temporarily during the course of the study. Average area weighted by relative abundance accounted for such differences. In addition, I

also compared body mass to typical home-range sizes and population densities reported in the literature for these species.

Results

Landscape Heterogeneity: Comparisons among Fragments

SPECIES RICHNESS AND DISTRIBUTION

The distribution of carnivore species varied across study sites (Table 1). Coyotes, opossums, gray foxes, domestic cats, striped skunks, and raccoons were detected in most urban fragments. Bobcats were detected in 9 of the 10 control sites but in only 2 urban habitat fragments, and mountain lions were detected in only 7 control sites and no urban fragments. I recorded few to no visits of mountain lions and bobcats in the habitat fragments, despite higher sampling intensity per unit area (station-nights/total area of site) in the 29 fragments (mean = 8.30 station-nights/ha, SE = 0.910) than in the 10 control sites (mean = 0.43 station-nights/ha, SE = 0.158) ($t = 4.58$, $p < 0.001$). Detections of spotted skunks, long-tailed weasels, and badgers were rare and occurred only in the larger habitat blocks.

Among the 29 urban habitat fragments, no landscape variables were retained as predictors of the total number of carnivore species in backward-elimination regression models (Table 2). When the opossum and domestic cat were excluded, however, the species richness of native carnivores exhibited a weak negative trend with fragment isolation (distance Z) and a weak positive trend with fragment age. When control sites were included in the analyses, both total carnivore species richness and native carnivore species richness increased with the area of the study site.

Logistic-regression models for each species indicated that the probability of occurrence across all sites was positively related to fragment area for coyotes ($\chi^2 = 5.57$, $p = 0.018$), bobcats ($\chi^2 = 29.85$, $p < 0.001$), mountain lions ($\chi^2 = 27.35$, $p < 0.001$), spotted skunks ($\chi^2 = 5.85$, $p = 0.016$), long-tailed weasels ($\chi^2 = 5.37$, $p = 0.021$), and badgers ($\chi^2 = 9.73$, $p = 0.002$). In contrast to these native carnivores, the probability of occurrence of domestic cats was higher in smaller fragments ($\chi^2 = 22.63$, $p < 0.001$). Area was not a significant predictor of probability of occurrence for gray foxes ($\chi^2 = 0.24$, $p = 0.627$), striped skunks ($\chi^2 = 1.81$, $p = 0.178$), raccoons ($\chi^2 = 2.02$, $p = 0.155$), or opossums ($\chi^2 = 0.357$, $p = 0.550$).

Logistic-regression models indicated that probability of occurrence across all sites decreased with fragment isolation (distance Z) for coyotes ($\chi^2 = 6.92$, $p = 0.008$), bobcats ($\chi^2 = 11.57$, $p < 0.001$), and mountain lions ($\chi^2 = 11.88$, $p < 0.001$). In contrast, probability of oc-

Table 2. Backward-elimination regression models of the effects of landscape variables on carnivore species richness and relative abundance among 29 urban habitat fragments and 10 control sites in coastal southern California.^a

Variables	R ²	Whole-model p	Coefficient	p
Urban habitat fragments				
total species richness				
n.s. ^b				
native species richness	0.146	0.129		
distance Z			-0.408	0.067
age			+0.374	0.091
coyote	0.133	0.052		
area			+0.365	0.052
gray fox	0.114	0.074		
area			-0.336	0.074
domestic cat	0.393	0.002		
area			-0.550	0.001
distance Z			+0.246	0.122
opossum	0.164	0.029		
area			-0.405	0.029
striped skunk				
n.s.				
raccoon				
n.s.				
All sites				
total species richness	0.194	<0.001		
area			+0.440	<0.001
native species richness	0.372	<0.001		
area			+0.610	<0.001
coyote	0.15	0.015		
area			+0.388	0.015
bobcat	0.595	<0.001		
age			-0.921	<0.001
distance Y			+0.607	0.004
distance Z			-0.376	0.030
mountain lion	0.277	<0.001		
age			-0.526	<0.001
gray fox	0.197	0.005		
area			-0.444	0.005
raccoon	0.081	0.081		
area			-0.284	0.081
domestic cat	0.335	<0.001		
area			-0.579	0.001
opossum	0.241	0.002		
area			-0.491	0.002
striped skunk				
n.s.				

^aIndependent variables are fragment area, age, and isolation (distance Y and distance Z). Independent variables with $p < 0.15$ were included in the final regression models.

^bNo independent variables were retained in the regression model ($p > 0.15$); n.s., not significant.

currence was higher in more isolated fragments for domestic cats ($\chi^2 = 4.25$, $p = 0.039$). Isolation was not a significant predictor of probability of occurrence for gray foxes ($\chi^2 = 0.35$, $p = 0.553$), opossums ($\chi^2 = 1.88$, $p = 0.171$), spotted skunks ($\chi^2 = 0.18$, $p = 0.671$), striped skunks ($\chi^2 = 0.69$, $p = 0.407$), raccoons ($\chi^2 = 0.06$, $p = 0.811$), long-tailed weasels ($\chi^2 = 1.74$, $p = 0.187$), or badgers ($\chi^2 = 2.62$, $p = 0.106$).

After I controlled for isolation effects, the estimated area at which probability of occurrence was 50% was 1 ha for coyotes, 1.8 km² for bobcats, and 23 km² for mountain lions (Fig. 1a). The probability of occurrence

for domestic cats dropped below 50% in fragments larger than 1.4 km²; cats were never detected in the interior of control sites, and few if any feral cats occurred in these sites.

After I controlled for area effects, the estimated fragment isolation (distance Z) at which probability of occurrence was 50% was 883 m for coyotes and 6 m for bobcats (Fig. 1b). The probability of occurrence for mountain lions was <50% across the entire isolation range of fragments. In contrast, the probability of occurrence for domestic cats was >50% across the entire range of fragment isolation.

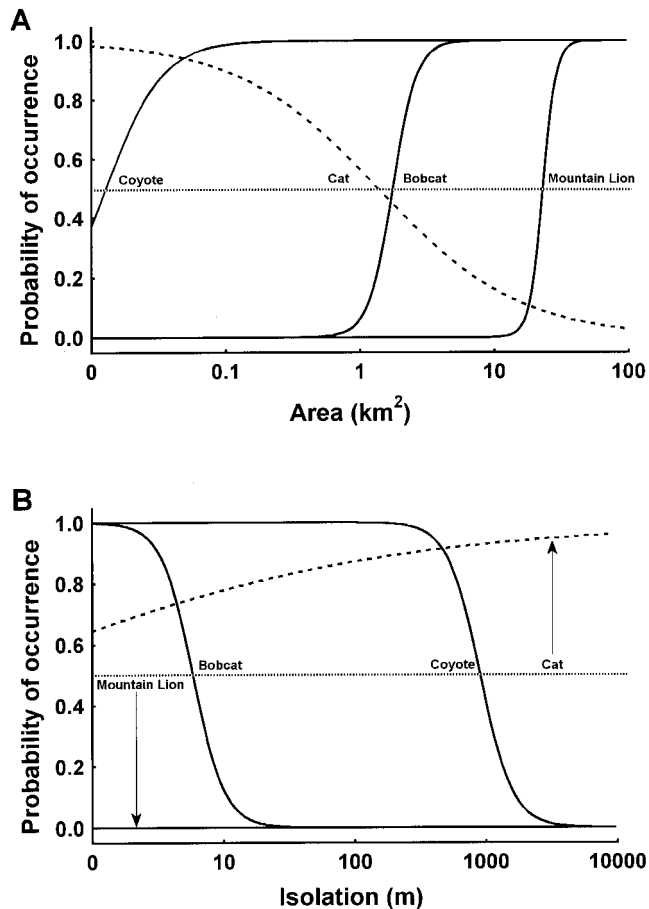


Figure 1. Logistic-regression models of the probability of occurrence of native (solid lines) and exotic (dashed line) carnivores as a function of (a) fragment area and (b) isolation. Area and isolation curves were constructed after the other independent variable was held constant by substituting its median values into a two-way (area \times isolation) logistic-regression model. Only species with significant area and isolation effects are presented. Dotted line represents 50% probability of occurrence.

Multiple logistic-regression models of the combined effect of area and isolation on mountain lions, bobcats, and coyotes generated “extinction surfaces” that consisted of plateaus of occupancy at larger and less isolated sites that declined to basins of local extinctions at small and isolated fragments (Fig. 2). The effect of the area-isolation interaction, and hence the contour of the extinction surfaces, varied among species. The plateau for mountain lions was small and occurred only in the largest unfragmented sites, with large basins across all other study areas. The plateau for bobcats spanned a wider range of sites, but probability of occurrence dropped to zero in sites that were both small and isolated. Bobcats occurred in relatively small sites, but only those with little to no isolation. The plateau of coyotes was large, with

a low probability of occurrence in only the smallest, most isolated urban fragments. Domestic cats exhibited a surface that was the inverse of these native predators. Their probability of occurrence was high in small and isolated fragments but lower in larger, less fragmented sites.

It should be emphasized, however, that the probability of residency or long-term viability of populations is undoubtedly lower than these probabilities of occurrence, particularly in smaller and isolated sites. For example, coyotes visited some fragments only temporarily during the course of the study. In some quarterly sampling sessions they were detected and in others they were not. Although the plateau of occupancy for coyotes encompassed most combinations of area and isolation, residency declined with fragment area. The average area of the 13 fragments in which coyotes came and went (mean = 0.75 [5.6 ha back-transformed], SD = 0.20) was smaller ($t = 3.01$, $p = 0.006$) than the average area of the 13 fragments in which coyotes were detected in every quarterly sampling session (mean = 1.19 [15.6 ha back-transformed], SD = 0.95).

RELATIVE ABUNDANCE

When only the 29 urban habitat fragments were included in the analyses, the relative abundance of coyotes at each sampling point was higher in larger fragments, whereas track indices of gray foxes, domestic cats, and opossums were higher in smaller fragments (Table 2). No variables were retained in the final model for raccoons and striped skunks ($p > 0.15$).

When control sites were also included in the regressions, coyote track indices at each sampling point again tended to be higher in larger sites. In contrast, the track indices of gray foxes, domestic cats, opossums, and raccoons were higher in smaller sites (Table 2). No landscape variables were retained in the models for the relative abundance of striped skunks.

When control sites were included in the regression models, fragment age was retained as the most significant predictor of the relative abundance of mountain lions and bobcats (Table 2); both species were less abundant in older sites. Mountain lions and bobcats were detected in relatively few sites, most of which were control areas not isolated by urban development (age = 0) and, for bobcats, a couple of recently isolated fragments (Table 1). This pattern generated the significant, negative slope between relative abundance and age for the two species.

The relative abundance of bobcats decreased with distance to the nearest movement linkage or natural area (distance Z) but, paradoxically, increased with distance to the nearest habitat patch of equal or larger size (distance Y). Bobcats were detected at sites that were relatively distant from larger natural areas (high values of

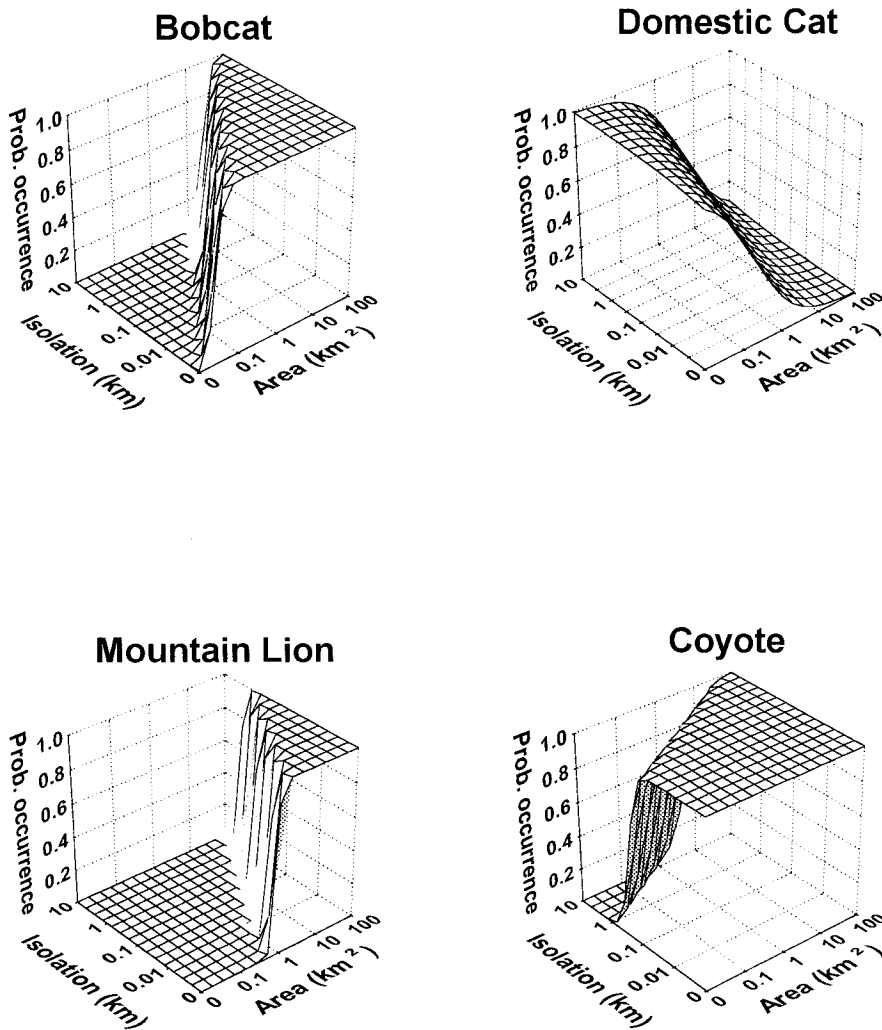


Figure 2. Multiple logistic-regression models of the probability of occurrence of mountain lions, bobcats, coyotes, and domestic cats as a function of fragment area and isolation. Only species with significant area and isolation effects are presented.

distance Y), but only if they were large or were near movement linkages to larger habitat blocks (low value of distance Z). For example, bobcats have persisted in the San Joaquin Hills, an isolated (distance $Y = 5353$ m) but large (4219 ha) habitat block. Bobcats were also detected in Mil Cumbres, a small (6 ha) urban fragment that was isolated from larger natural areas (distance $Y = 550$ m) but that was near a golf course (distance $Z = 23$ m), which likely served as a movement linkage to natural areas to the east.

Local Heterogeneity: Comparisons within Fragments

SPECIES RICHNESS AND RELATIVE ABUNDANCE

The number of carnivore species detected was greater at track stations closer to the urban edge (Table 3). This pattern was largely determined by non-native species. When exotic predators (domestic cats, opossums) were excluded from the analyses, the number of native species detected at each station did not vary significantly with any local variables.

The relative abundance of gray foxes and opossums was higher at track stations near the urban edge within fragments where each species occurred (Table 3). The abundance of domestic cat exhibited a weak negative trend with distance to urban edge. The relative abundance of striped skunks tended to be higher at greater distances from the urban edge. Domestic cats and raccoons tended to be more abundant at stations with more exotic cover. No local variables entered the model for the relative abundance of coyotes.

A graphical analysis revealed that the coyote rate of visitation to track stations was high both near the urban edge and into the interior of the urban habitat fragments (Fig. 3). The abundance of striped skunks also was relatively high in the interior of fragments. In contrast, the abundance of opossums, gray foxes, domestic cats, and raccoons was relatively high within 50 m from urban development, but then tended to decline into the interior of the habitat fragment.

Body Size and Fragmentation Sensitivity

When all species were included in the regression, the relationship between body mass (Table 4) and the average

Table 3. Backward-elimination regression models of the effects of local habitat variables on carnivore species richness and relative abundance at 92 track stations within 29 urban habitat fragments in southern California.^a

Variables	R ²	Whole-model p	Coefficient	p
Total species richness	0.049	0.036		
edge			-0.222	0.036
Native species richness				
n.s. ^b				
Coyote (87 stations)				
n.s.				
Gray fox (85)	0.146	<0.001		
edge			-0.382	<0.001
Striped skunk (69)	0.042	0.095		
edge			0.205	0.095
Raccoon (62)	0.056	0.066		
exotic			0.237	0.066
Domestic cat (73)	0.143	0.005		
exotic			0.242	0.057
edge			-0.205	0.105
Opossum (79)	0.079	0.013		
edge			-0.281	0.013

^aIndependent variables are distance to urban edge, native shrub cover, and total exotic cover. Independent variables with $p < 0.15$ were included in the final regression models. For each species, stations were included only in analyses for those fragments where the species was detected.

^bNo independent variables were retained in the regression model ($p > 0.15$); n.s., not significant.

area of study sites occupied by each carnivore species, weighted by the standardized track index of each species at each site, was not significant ($r = -0.392$, $p = 0.233$) (Fig. 4a). Spotted skunks, long-tailed weasels, and badgers, however, appeared to be outliers to an otherwise positive relationship between body size and average area of sites occupied. When these three species were excluded from the regression, the positive relationship was significant ($r = 0.725$, $p = 0.042$). Body mass was also positively related to typical home-range sizes (Fig. 4b: $r = 0.720$, $p = 0.012$) and negatively related to typical population densities (Fig. 4c: $r = -0.705$, $p = 0.015$) recorded for these species (Table 4).

Discussion

Landscape Heterogeneity and Carnivore Populations

Fragment area and isolation were the two strongest landscape predictors of predator distribution and abundance. Badgers, long-tailed weasels, spotted skunks, mountain lions, bobcats, and coyotes appear to be the species most sensitive to fragmentation, with a lower probability of occurrence and relative abundance per unit area in smaller and more isolated habitat patches. In contrast, the probability of occurrence and relative abundance of domestic cats, gray foxes, and opossums tended to decrease with fragment area and increase with fragment isolation. Landscape descriptors had relatively little effect on the distribution and abundance of raccoons and striped skunks. Because some carnivores

were fragmentation-sensitive, some fragmentation-enhanced, and some fragmentation-tolerant, landscape variables appear to affect species composition more than species richness.

The probability of occurrence of mountain lions, bobcats, and coyotes declined in sequence as habitat patches became smaller and more isolated (Fig. 1). Because mountain lions, bobcats, and coyotes generally occurred in fragments above some threshold of size and isolation, local extinctions of their populations in a fragmenting landscape appear deterministic and predictable (Brown 1986). Such thresholds also suggest that, depending on the species and the degree of fragmentation, a single large reserve would have a higher probability of supporting populations of these predators than archipelagos of similar but smaller isolates (Soulé & Simberloff 1986). For example, our models predict that the probability of occurrence of bobcats will be low in 10 1-km² isolates but higher in a 10-km² reserve, and that the probability of occurrence of mountain lions will be low in 10 10-km² isolates but higher in a 100-km² reserve (Fig. 1).

Unlike true islands, habitat patches are part of a landscape mosaic, and the presence of a given species in a patch may be a function not only of patch size and isolation, but also of how the species perceives the intervening matrix (Andren 1994; Rosenblatt et al. 1999). In previous studies in this system, fragment age and area were the most important landscape predictors of the distribution and abundance of native plants (Alberts et al. 1993), scrub-breeding birds (Soulé et al. 1988; Crooks et al. 2001), rodents (Bolger et al. 1997), and invertebrates

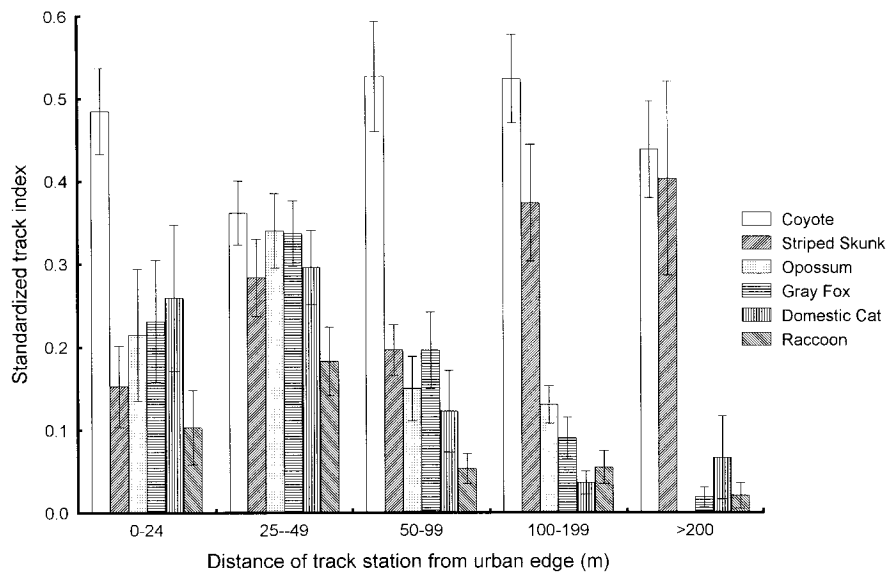


Figure 3. Track indices of carnivore species within urban habitat fragments as a function of the distance of the station from the urban edge. Track indices are standardized for each species.

(Suarez et al. 1998; Bolger et al. 2000). With limited exceptions, isolation effects were absent for these species, likely due to their strict habitat requirements and low dispersal capabilities (Soulé et al. 1992). For these taxa, little to no dispersal across developed areas resulted in complete isolation once fragmentation had occurred, with the fragments operating as true islands immersed within a relatively inhospitable matrix. My results also indicate that fragment isolation was not a strong predictor of the distribution and abundance of human-tolerant mesopredators, although the causal mechanisms differed. Unlike many native scrub-breeding birds, rodents, and invertebrates, mesopredator species such as raccoons, striped skunks, opossums, and domestic cats move through and reside within developed areas and thus perceive the urban matrix as somewhat permeable. High rates of movement through the matrix within

which fragments are embedded should also minimize the effects of fragment isolation.

Local Heterogeneity and Carnivore Populations

Within the urban fragments, exotic cover and distance to the urban edge were the strongest local predictors of carnivore distribution and abundance. These two variables were correlated, with more exotic cover and less native shrub cover closer to the urban edge. Previous studies have found that scrub-breeding birds (Soulé et al. 1988), rodents (Bolger et al. 1997), and invertebrates (Suarez et al. 1998; Bolger et al. 2000) require native vegetation to persist in these fragments. Unlike many of these species, however, the mammalian carnivores detected in the habitat fragments are resource generalists that likely benefit from the supplemental food resources

Table 4. Ecological characteristics of mammalian carnivores detected in coastal southern California.^a

Species	Weight (kg)	Home range (km ²)	Density (km ²)	Reference
Mountain lion	69.5 (36.0–103.0)	492 (112–829)	0.027 (0.005–0.048)	Beier & Barrett 1993; Nowak 1999
Coyote	13.5 (7.0–20.0)	5.69 (0.66–11.96)	0.3 (0.2–0.4)	Nowak 1999; Sauvajot et al. 2000
Bobcat	9.7 (4.1–15.3)	2.94 (0.24–5.63)	1.34 (1.15–1.53)	Lembeck 1986; Nowak 1999
Badger	8.0 (4–12)	2.0 (1.6–2.4)	2.70 (0.39–5.0)	Messick 1987; Nowak 1999
Raccoon	7.0 (2.0–12.0)	0.52 (0.39–0.65)	11.2 (2.3–20.0)	Nowak 1999
Gray fox	4.4 (1.8–7.0)	0.69 (0.22–1.87)	5.2 (0.4–10.0)	Nowak 1999; Riley 1999
Domestic cat ^b	3.9 (3.3–4.5)	0.40 (0.001–3.80)	150 (2–500)	Barratt 1997; Nowak 1999
Opossum	3.8 (2.0–5.5)	0.20 (0.05–2.54)	26 (2–116)	Nowak 1999
Striped skunk	1.6 (0.7–2.5)	0.21 (0.11–0.37)	3.3 (1.8–4.8)	Nowak 1999
Spotted skunk	0.6 (0.2–1.0)	0.49 (0.34–0.65)	24.4 (8.8–40)	Crooks & Van Vuren 1995; Kinlaw 1995; Nowak 1999
Long-tailed weasel	0.2 (0.09–0.34)	0.62 (0.04–1.20)	19.4 (0.38–38)	Nowak 1999

^aEstimates of body size, home range, and population density vary considerably (Nowak 1999). Values are typical averages and ranges (in parentheses). If no average estimate was provided, median values, calculated from the ranges, are presented. Body-mass estimates were taken from Nowak (1999). Where available, home ranges and population densities were taken from studies conducted in California.

^bEstimates include studies from suburban, urban, rural, and island cat populations.

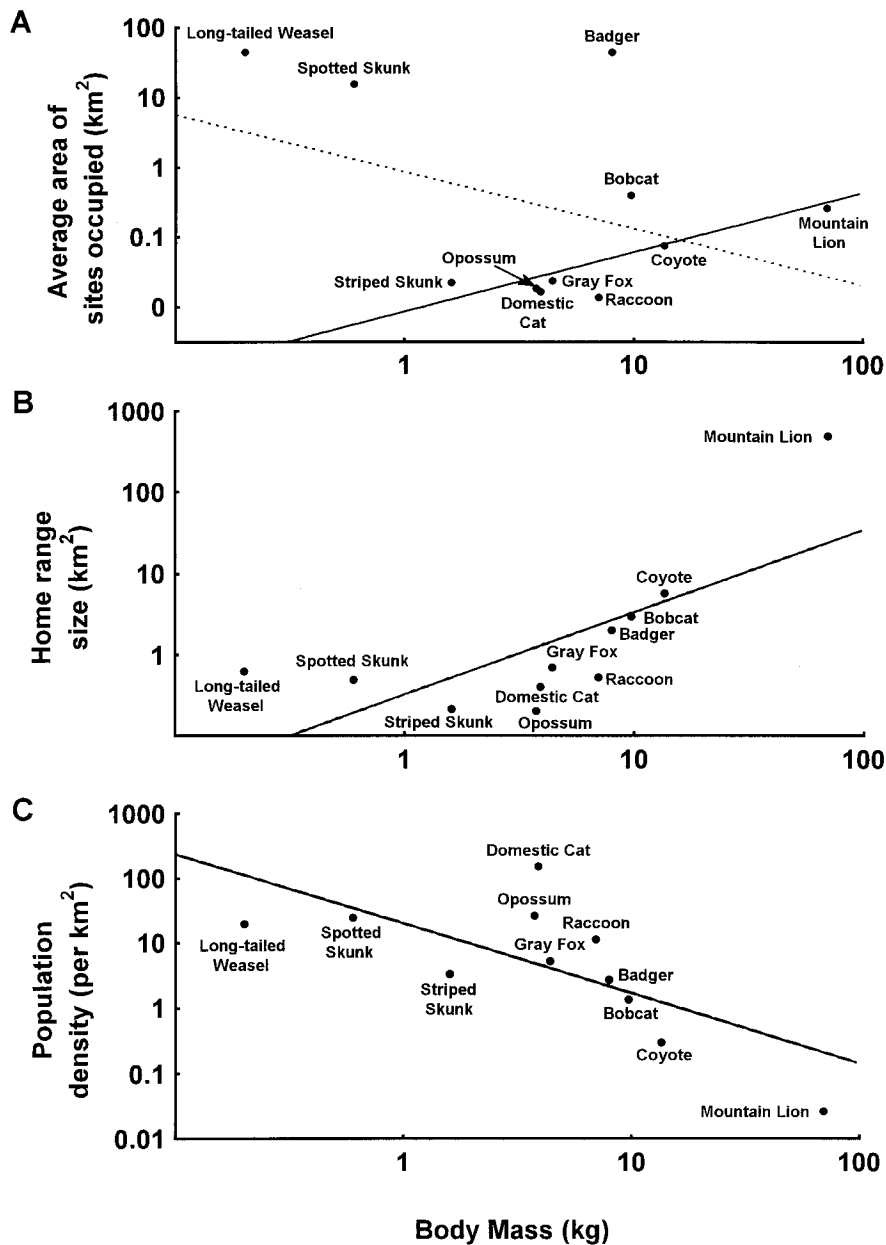


Figure 4. Relationship between log body mass and (a) log average area of sites occupied by mammalian carnivores, weighted by the relative abundance of each species at each site, (b) log home-range size ($r = 0.720$, $p = 0.012$; see Table 4 for values), and (c) log population density ($r = -0.705$, $p = 0.015$; see Table 4 for values). Dotted line in (a) is the least-squares regression fit including all species in the analysis ($r = -0.392$, $p = 0.233$), and the solid line in (a) is the regression excluding spotted skunks, long-tailed weasels, and badgers ($r = 0.725$, $p = 0.042$).

(e.g., garden fruits and vegetables, garbage, direct feeding by humans) associated with residential developments. As a result, the carnivore visitation rate actually increased at sites with more exotic cover and closer to the urban edge, a pattern determined largely by the increased abundance of fragmentation-enhanced mesopredators (gray foxes, opossums, and domestic cats) at edge sites within habitat fragments. Although some carnivores within the habitat fragments seem tolerant of disturbance, these fragments have already lost an entire suite of predator species, including mountain lions, bobcats, spotted skunks, long-tailed weasels, and badgers. Furthermore, the habitat fragments are relatively small (<100 ha), so the most “interior” sites within the fragments are still relatively near (<250 m) urban edges.

Unlike true islands, “edge effects” that emanate from the human-dominated matrix can increase the extinction probability of isolated populations (Murcia 1995; Woodroffe & Ginsberg 1998). Human-tolerant mesopredators in southern California represent such an edge effect. They occur within the developed matrix, and are effective predators on birds, bird nests, and other vertebrates in this system and elsewhere (Crooks & Soulé 1999). Several factors likely account for increased numbers and activity of mesopredators in disturbed landscapes. Residential developments represent suitable habitat for some mesopredator species whose distributions are closely associated with human-dominated landscapes (Donovan et al. 1997). In addition to

habitat suitability, however, dominance interactions between carnivores affect mesopredator populations. When large, dominant predators disappear in fragmented systems, smaller, subordinate predators can subsequently undergo an ecological release, a pattern termed mesopredator release (Soulé et al. 1988; Crooks & Soulé 1999). In the San Diego habitat fragments, Crooks and Soulé (1999) found that lower visitation rates of coyotes in small, isolated remnants resulted in elevated numbers and activity of urban mesopredators, even after statistically controlling for potential confounding variables such as fragment area, age, and isolation. Mesopredator species therefore appear to be ecologically released by fragmentation not only because they can adapt well to urban environments, but also because such sites may provide refugia from dominant predators.

All Carnivores Are Not Created Equal

Although they are generally considered part of the same ecological guild, I found that carnivores were heterogeneous in their sensitivities to landscape and local fragmentation variables. As predicted, body-size differences partially accounted for this heterogeneity in response. Body mass was positively related to typical home-range sizes (Fig. 4b) and negatively related to typical population densities (Fig. 4c) recorded for these species, patterns consistent with those observed among mammals (Lindstedt et al. 1986). Due to their wide ranges and low densities, larger-bodied carnivores generally required larger areas (Fig. 4a), eventually disappearing in habitat fragments that were not connected by movement corridors. Obvious exceptions to the allometry of body size and fragmentation sensitivity, however, were spotted skunks, long-tailed weasels, and badgers, small- to medium-bodied species that exhibit relatively small home ranges and high population densities but that were detected only in the largest habitat blocks. Unlike the generalist urban mesopredators, these relatively specialized mustelids tend to be primarily carnivorous and somewhat restricted in their habitat preferences (Nowak 1999). Such specializations likely contribute to their patchy distribution in coastal southern California and increase their vulnerability to environmental disturbances. Clearly, in addition to body size, other ecological traits such as diet, resource specialization, social structure, and behavior contribute to species-specific responses to fragmentation effects.

Differential sensitivities to fragmentation can be useful criteria when focal species are chosen for ecological research and conservation planning. Mammalian carnivores can be excellent focal organisms with which to evaluate the degree of functional landscape-level connectivity, because they are area-dependent species that require movement corridors for persistence (Beier 1993;

Noss et al. 1996; Soulé & Terborgh 1999). The choice of appropriate carnivore focal species, however, depends on the scale or intensity of fragmentation in an area and the corresponding responses of carnivore populations to fragmentation effects at that scale. As Figs. 1 and 2 make evident, the scale of landscape-level connectivity in southern California varies widely, ranging from small, isolated urban remnants to large, intact habitat blocks.

At one extreme of the connectivity scale are the highly fragmented landscapes of urban coastal southern California (e.g., patch size $<1 \text{ km}^2$; Fig. 1a). Coyotes and urban mesopredators can be useful focal species with which to understand the effects of fragmentation at this scale. Fragmentation-enhanced predators such as opossums and domestic cats can function as direct, positive indicators of environmental disturbances associated with urban development, edge effects, and the invasion of exotic predators and competitors into natural systems. Coyotes have also persisted in developed areas in southern California. The remarkable behavioral plasticity of coyotes and their ability to succeed in disturbed areas limits their utility as an indicator of connectivity across much of coastal southern California. Nevertheless, coyote occupancy, residency, and relative abundance declined with fragment area and isolation, to the point of local extinctions of coyote populations in the smallest, most isolated urban remnants. Coyotes can therefore serve as useful indicators of functional connectivity in highly fragmented areas, particularly those sites that have already lost more vulnerable predators such as bobcats and mountain lions (Figs. 1 & 2). Furthermore, the ecologically pivotal role of coyotes (Crooks & Soulé 1999) warrants their inclusion in research and conservation plans, particularly in regions with active predator-control programs.

Mountain lions are situated at the opposite end of the connectivity scale (e.g., patch size $>100 \text{ km}^2$; Fig. 1a) and appear extremely sensitive to the loss and fragmentation of habitat. The large body size and solitary behavior of mountain lions translate to large home ranges and low population densities (Table 4). Therefore, many of the isolated habitat remnants in urban southern California are likely too small and too isolated to permanently support any resident lion populations (Figs. 1 & 2) (see also Beier 1993). Consequently, mountain lions or other large, apex predators may not be the most effective indicator species with which to evaluate the degree of functional landscape-level connectivity in moderately to highly fragmented landscapes. The mountain lion's requirement for a large home range and its sensitivity to environmental perturbations, however, can make it a valuable focal species in larger, more intact habitat blocks (Beier 1993).

Finally, bobcats were intermediate in their sensitivity to fragmentation, a degree of sensitivity commensurate to the scale of fragmentation across much of coastal

southern California (e.g., $1 \text{ km}^2 < \text{patch size} < 100 \text{ km}^2$; Fig. 1a). Bobcats were less sensitive to disturbance than mountain lions, which seldom occurred in fragmented areas, yet were more sensitive than coyotes and mesopredators, which were detected in even small urban habitat fragments. Bobcats are generally solitary and are strictly carnivorous (Nowak 1999), resulting in low densities and in resource specializations that likely increase their probability of local extinction. Landscape connectivity appears to be the key to the persistence of bobcat populations in developing landscapes. They can persist in fragmented habitats, but, as my results suggest, only in those landscapes with adequate movement linkages to larger natural areas. The status of bobcat populations is therefore a valuable indicator of the degree of functional, landscape-level connectivity across much of the fragmented landscapes of coastal southern California. In other systems, the choice of indicator species will require information on the level of fragmentation and connectivity in that region and how species respond to fragmentation effects at that scale.

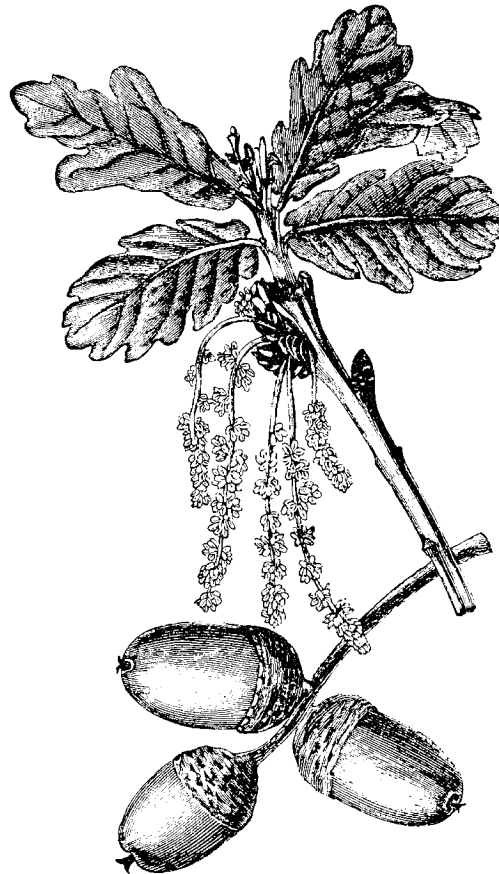
Acknowledgments

I thank M. Soulé for his guidance during this project. L. Angeloni, D. Bolger, T. Case, J. Crooks, D. Doak, R. Fisher, S. George, C. Haas, S. Hathaway, P. Horn, D. Jones, B. Kristan, T. Lynam, L. Lyren, D. Menendez, S. Minta, P. Raimondi, B. Rice, R. Sauvajot, T. Smith, A. Suarez, and D. Van Vuren all provided helpful advice and assistance during the course of the project. The research would not have been possible without the cooperation of Chino Hills State Park, Miramar Marine Air Corps Station, the Nature Reserve of Orange County, Point Loma Ecological Reserve, Santa Margarita Ecological Reserve of San Diego State University, Starr Ranch Audubon Sanctuary, and Torrey Pines State Reserve. This research was funded by grants from the American Society of Mammalogists, the California Department of Transportation, Dan Brimm, an Environmental Protection Agency STAR Graduate Fellowship, the Mountains Recreation and Conservation Authority, a National Science Foundation Graduate Fellowship, the Nature Reserve of Orange County, Phi Beta Kappa Honor Society, the Seaver Foundation, and Torrey Pines State Reserve.

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December 16, 2015

Susan Morrison, Environmental Planner
City of San Diego Planning Dept.
1010 Second Av., MS 614C
San Diego CA 92101

Sent Via email to: Planningceqa@sandiego.gov

Subject: University Community Plan Amendment -- Internal Order 12002051/11003327
SCH. No. *Pending*

Dear Ms. Morrison,

The NOP states **TWICE** that the notice was published in the San Diego Daily Transcript on December 2, 2015. How was the notice published in the San Diego Daily Transcript when the paper has been defunct since September?

If the City errs and misleads the public on something as simple as the publication of the notice, how can we trust the accuracy of anything in the Scoping Document?

The Scoping Document is confusing. How is a project the removal of a project? Are you asking for the environmental impacts of removing the Regents Rd. Bridge?

Sincerely,



Richard Pietras

From: [Rich Pietras](#)
To: [PLN_PlanningCEQA](#)
Subject: : University Community Plan Amendment -- Internal Order 12002051/11003327
Date: Wednesday, December 16, 2015 8:24:23 PM

Richard Pietras
6917 Lipmann Street
San Diego CA 92122
858 452-8378
rich@repmesa.com
December 16, 2015

Susan Morrison, Environmental Planner
Planningceqa@sandiego.gov
City of San Diego Planning Dept.
1010 Second Av., MS 614C
San Diego CA 92101

Sent Via email to:

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Sincerely,

Richard Pietras

RINCON BAND OF LUISEÑO INDIANS

Cultural Resources Department

1 W. Tribal Road · Valley Center, California 92082 ·
(760) 297-2635 Fax:(760) 749-2639



December 10, 2015

Susan Morrison
The City of San Diego
Planning Department
1010 Second Avenue, MS 614C
San Diego, CA 92101

Re: University Community Plan Amendment

Dear Ms. Morrison:

This letter is written on behalf of the Rincon Band of Luiseño Indians. Thank you for inviting us to submit comments on the University Community Plan Amendment Project. Rincon is submitting these comments concerning your projects potential impact on Luiseño cultural resources.

The Rincon Band has concerns for the impacts to historic and cultural resources and the finding of items of significant cultural value that could be disturbed or destroyed and are considered culturally significant to the Luiseño people. This is to inform you, your identified location is not within the Luiseño Aboriginal Territory. We recommend that you locate a tribe within the project area to receive direction on how to handle any inadvertent findings according to their customs and traditions.

If you would like information on tribes within your project area, please contact the Native American Heritage Commission and they will assist with a referral.

Thank you for the opportunity to protect and preserve our cultural assets.

Sincerely,

Vincent Whipple
Manager
Rincon Cultural Resources Department

Elinor M. Jacobs
Robert A. Jacobs
4624 Murphy Avenue
San Diego, CA 92122
858-453-1528, Cell 858-354-3125
eljacobs@san.rr.com; rjacobs4@san.rr.com

December 14, 2015

Susan Morrison, Environmental Planner
Planning CEQA@sandiego.gov
City of San Diego Planning Dept.
1010 Second Ave., MS 614C
San Diego, CA 92101

Subject: University Community Plan Amendment –Internal Order Number 120020551/11003327
SCH. No. Pending

Dear Ms. Morrison;

I, Elinor Jacobs, have been a resident of San Diego for 42 years and my husband Robert Jacobs, is proud to be a Diego Native. We have been extremely happy living in University City for these 42 years and plan to remain here for the remainder of our lives. Therefore, we are very concerned with our community events and events that have taken place.

We recently became aware that the Regents Road Bridge which was approved and fully funded by developers and still has not been completed. We recently learned that the Bridge that we thought was a dead issue, after 40 plus years, is in fact, still in the UC Plan. We have been talking to numerous individuals in the community who have devoted years and numerous hours of their time trying to get the bridge built.

We became aware of the many hoops and denials and our District 1 representative who is trying to get this bridge removed from the UC Plan now.

We are fed up with the obstructions and strenuously object to the timing of the NOP and Scoping Meeting during the busy Holiday season. **This is a formal request for the Comment Period to be extended and the Scoping Meeting be rescheduled to January or February, 2016. It is the right thing to do!**

Sincerely,

Robert A. Jacobs
Elinor M. Jacobs

From: [Elinor Jacobs](#)
To: [PLN PlanningCEQA](#)
Subject: University Community Plan Amendment-Internal Order Number 120020551/11003327
Date: Monday, December 14, 2015 4:51:26 PM
Attachments: [NextdoorLtrMorrison2015.docx](#)

From: [Roger Cavnaugh](#)
To: [PLN_PlanningCEQA](#)
Subject: University Community Plan Amendment
Date: Monday, January 04, 2016 9:25:26 AM

Dear Planning CEQA,

I am a 32 year resident of University Woods which is north of Rose Canyon and east of Regents Road in University City. I strongly agree with our current Council Member Sherri Lightner, our Mayor Kevin Faulconer, the consensus of the University City Planning Group, and the overwhelming majority of University City residents that the long proposed bridge over Rose Canyon on Regents Road has been overtaken by 30 years of community development, is counterproductive, and should be permanently removed from our local plan.

As a parent I am particularly concerned with the welfare of children and young people living along and near Regents Road. Doyle School, Doyle Park and Doyle Community Center which are just north of where the proposed bridge would be built involve high density foot traffic of children walking to and from school, accessing the park and using the community center. Immediately before and after school there is congested auto traffic as well as children crossing streets. It would be dangerous to allow relatively high speed commuter traffic to funnel onto Regents at these times.

Several long term studies done abroad have recently released findings that auto pollution is the major constituent of cognitive impairment in children living in areas where air quality is compromised. Adding commuter traffic to Regents and exposing children whose developing neural system is vulnerable to increased toxins violates common sense.

In addition, the park and community center draw substantial numbers of preschoolers during the day, and after school programs continue the relative density of children and youngsters in the immediate area over the entire day and into the early evening seven days a week. Development around Regents Road conforms to the City San Diego's emphasis on high density concentrations facilitated by public transit. A bridge on Regents would also produce traffic that interferes with the large number of UCSD students living locally who walk, bike, skateboard and bus to classes.

As part of our quality of life preservation of Rose Canyon is imperative. A bridge on Regents would substantially deteriorate the invaluable wildlife, recreational and educational resources of Rose Canyon that are well used and highly regarded in our community. According to the 1987 Plan we are drastically short on park space given our population and the extensions of Regents Rd both north and south towards the canyon rim could be used to provide more green space. Such green space is not a frivolous nicety. We are out of touch with Nature and are beginning to see some of the serious consequences of our poor use of resources, and our lack of understanding of our role as a part of Nature rather than her master. If we are to create a sustainable life style, economy and community we can hardly do so when minimizing our contact with Nature and continuing to build, build, build just because we can or because of wanting convenience at the expenses of other considerations that are far more valuable in the long term.

Our neighborhood is one of the few in the city that is walkable to almost all needed basic public and private services. A bridge over Regents would seriously degrade the safety and quality of life in our neighborhood and should be removed from the University City Plan.

Sincerely,

Roger Cavnaugh
District Three Residential Representative
UCPG



CITY OF SAN DIEGO

PLANNING DEPARTMENT
ENVIRONMENTAL ANALYSIS

PUBLIC SCOPING MEETING

University Community Plan Amendment / DECEMBER 16, 2015

This meeting is being held pursuant to the *California Public Resources Code Section 21083.9 et seq.*, and is provided to give the public and interested parties an opportunity to submit comments regarding the potential environmental impacts of the proposed project. This information will be used to develop the scope and content of the proposed Environmental Impact Report (EIR) for the project to be described at this meeting. Please record your comments in the space provided below and submit this form to City staff at the conclusion of the meeting or you can mail to the address noted on the back of this form. Thank You.

Comments: Reger's Road / Genesee Ave. Bridge

This project being considered is not confined to the University ^{City} community alone. The entire stretch of this road from Torrey Pines Rd. until it ends at 163 Freeway has also been impacted. Communities along this road are seeing more traffic in their neighborhoods due to commuters trying to find access to freeways and avoid major exit ramps. Freedom to travel easily through their own environment is impacted. Clairemont Mesa, Balboa, Clairemont Dr., Linda Vista Bay Park are all connected to Genesee. Build The Bridge!

Name Rosemary Vikander Signature Rosemary Vikander
Address 4358 Bromfield Ave San Diego CA 92122

Use back of sheet if additional space is necessary.

From: russc@pacbell.net
To: [PLN_PlanningCEQA](#)
Subject: University Community Plan Amendment
Date: Thursday, December 17, 2015 9:14:27 AM

I am the President of the Valencia HOA a community of 146 houses along Rose Canyon.

Building the bridge across Rose Canyon will simply bring more traffic into the area and not improve traffic congestion while irreparably damaging Rose Canyon Open Space Park and degrading the livability of our residential neighborhoods.

If need be Genesee can be widened with a thruway at Governor drive to try to improve congestion but does anyone really think that congestion at rush hour which is the only bad time will ever really be alleviated?

The mayor's proposal to add services to south University City will actually solve any lack of services problem instead of just creating another busy street and filling precious open space with concrete and more vehicles.

Find real solutions to perceived problems. Do not build the bridge.

Thank you

RUSS CRAIG, CRS
Re/max Hall of Fame
russc@pacbell.net
russcraig.com
858-361-7877-Cell
CA BRE #01136696



California Regional Water Quality Control Board

San Diego Region



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February 28, 2005

Ms. Martha Blake
Associate Planner
City of San Diego Development Services Center
1222 First Avenue, MS 501
San Diego, CA 92101

Dear Ms. Blake:

**SUBJECT: UNIVERSITY CITY NORTH/SOUTH TRANSPORTATION CORRIDOR
STUDY EIR**

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Overall, the draft EIR fails to provide sufficient information to support the conclusion that the project will not have a significant effect on water quality and beneficial uses. Furthermore, the draft EIR fails to identify project-specific measures that will mitigate significant impacts. The Regional Board requests that the Final EIR address the following specific concerns.

PROJECT DESCRIPTION

The project description in the draft EIR is vague, incomplete, and confusing; this makes it difficult to determine the full nature and extent of possible impacts to water quality and beneficial uses. The detailed engineering sections show typical sections, but do not provide information on the entire project. Furthermore, project features described in the text, are not shown on figures depicting project impacts (e.g., proposed parking lot to replace lost parking lot).

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The draft EIR states several times that dewatering may be required during construction; however, it fails to identify potential volumes, water quality, discharge rates and duration, discharge locations, and specific BMPs. In the absence of this information, the conclusion that impacts are not significant is premature.

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Quality Certification application if detention facilities are proposed for construction within jurisdictional waters.

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The Draft EIR does not clearly, consistently, and accurately identify existing conditions and impacts to waters of the U.S. and State. Specific examples include the following:

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10. Impacts from the Limited Roadway Changes (LRC) alternative should be shown on figures to allow the reader to clearly understand the areas of jurisdictional waters that will be impacted by this alternative.
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The draft EIR does not discuss direct and indirect impacts that may result from dewatering activities. For example, will dewatering activities dry-up the wet meadow in Rose Canyon? The document needs to clearly identify the level of dependence on surface and ground water, by plant community, and direct and indirect impacts from dewatering activities. The document should look at dry, wet, and average rain years to assess potential impacts.

The draft EIR also provides no discussion of how stream flows in Rose and Sycamore Canyons will be rerouted during construction activities; impacts within, upstream, and downstream of the project area; and proposed and alternative construction methods to reduce impacts from stream rerouting. Without this information, the full nature and extent of impacts resulting from project alternatives cannot be ascertained.

The EIR should also look at alternative access routes and construction activities to minimize overall impacts to jurisdictional waters. The document should also provide one summary table that allows the reader to easily compare impacts to jurisdictional waters from each of the alternatives.

The EIR needs an expanded discussion regarding the SWS that was restored as a result of a grant. The City of San Diego applied for, and received, a grant from the California Department of Parks and Recreation Habitat Conservation Fund Program for Riparian Enhancement/Restoration at Rose Canyon Open Space Park. The grant was to remove nonnative vegetation and replant the areas with appropriate native vegetation. It appears that portions of Rose Creek that was restored through this grant will be impacted by the Regents Road Bridge alternative, and possibly other alternatives. The EIR needs to clearly delineate the restoration areas on a figure and show and discuss direct and indirect impacts that would occur with each project alternative. Furthermore, the EIR needs to clearly discuss how the City of San Diego will rectify these impacts with the assurances required as part of the grant. The California State Parks procedural guidance requires assurances that the "Applicant will maintain and operate the property acquired, rehabilitated, or restored with the funds in perpetuity." Furthermore, the guidance requires assurances that the "Applicant will use the property only for the purposes of the California Wildlife Protection Act of 1990 and to make no other use, sale, or other disposition of the property except as authorized by specific act of the Legislature."

The City of San Diego also implemented mitigation within Rose Canyon for impacts associated with the 1996 trunk sewer project. The Regents Road Bridge alternative, and possibly others, could result in impacts to the mitigation area. The EIR needs to clearly delineate the mitigation area(s) on a figure and show and discuss direct and indirect impacts that would occur with each project alternative. Furthermore, the EIR needs to state if the mitigation area was to be preserved in perpetuity as part of the ACOE, CDFG, and/or Regional Board permits. If the mitigation area and/or grant restoration area are required to be preserved in perpetuity, it does not seem likely that alternatives that would impact the areas would be viable.

MITIGATION MEASURES

The draft EIR defers the identification of specific mitigation measures to the permitting process. This is in direct contravention of the CEQA guidelines (CEQA Guidelines § 15126.4 and 15126(e)) and defeats the purposes of CEQA. Accordingly, each significant impact should have

clearly defined, detailed description of mitigation measures proposed to minimize significant effects to water quality and beneficial uses (CEQA § 21100(b)(3)). CEQA Guidelines § 15126.4(a) state:

(1) An EIR shall describe feasible measures which could minimize significant adverse impacts, including where relevant, inefficient and unnecessary consumption of energy.

(A) The discussion of mitigation measures shall distinguish between the measures which are proposed by project proponents to be included in the project and other measures proposed by the lead, responsible or trustee agency or other persons which are not included but the lead agency determines could reasonably be expected to reduce adverse impacts if required as conditions of approving the project. This discussion shall identify mitigation measures for each significant environmental effect identified in the EIR.

(B) Where several measures are available to mitigate an impact, each should be discussed and the basis for selecting a particular measure should be identified. Formulation of mitigation measures should not be deferred until some future time. However, measures may specify performance standards which would mitigate the significant effect of the project and which may be accomplished in more than one specified way.

Moreover, the lack of specific mitigation measures only serves to heighten the significance of the impacts because the City has not identified any measures that will mitigate significant impacts. The EIR needs to clearly identify mitigation site(s); mitigation site conditions and relationship to the impacted area(s); proposed mitigation activities (e.g., grading for creation, removal of exotic species for enhancement); success criteria; implementation schedule; remedial measures; and a qualitative and quantitative discussion of functions at the impact and mitigation areas. Identification of mitigation sites is particularly important for the City given their recent difficulties in identifying appropriate mitigation sites for impacts resulting from other City projects.

The wetland habitat mitigation table (Table 4.3-13) in the draft EIR is inadequate. The table needs to identify permanent and temporary impacts by plant community for each alternative; specific mitigation ratios; and whether mitigation is creation, restoration, or enhancement. The table also needs to separate-out impacts to the areas restored as mitigation for the trunk sewer project and grant project as, if impacts are legal, mitigation ratios will be significantly higher than those proposed for other areas. Out-of-kind mitigation is also likely to result in higher mitigation ratios.


The Regional Board recommends that the City correct all deficiencies in the draft EIR to provide the public and reviewing agencies with an accurate and complete description of the project, its

February 28, 2005

impacts, and specific mitigation measures. We also recommend that the City select an alternative that avoids impacts to waters of the U.S. and State, as the draft EIR has not demonstrated that impacts would not be significant; would be mitigated; and would be legal in areas restored as part of the grant and previous mitigation activities.

If you have any questions regarding this letter, please contact Ms. Stacey Baczkowski at 858-637-5594 or sbaczkowski@waterboards.ca.gov.

Respectfully,


John H. Robertus
Executive Officer

cc: California Department of Fish and Game; Ms. Elizabeth Lucas
U.S. Fish and Wildlife Service; Ms. Carolyn Lieberman



Linda S. Adams
Secretary for
Environmental Protection

California Regional Water Quality Control Board San Diego Region

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July 25, 2006

In reply refer to:
CWU:CEQA:clemc

Ms. Martha Blake
Associate Planner
City of San Diego Development Services Center
1222 First Ave., MS 501
San Diego, CA 92101

Dear Ms. Blake:

**SUBJECT: University City Transportation Corridor EIR, Project #27445,
SCH#2004031011**

By letter dated February 28, 2005 the Regional Board submitted extensive and detailed comments on the Draft EIR (as modified by errata). In that letter we expressed our concern that, "the Draft EIR fails to provide sufficient information to support the conclusion that the project will not have a significant effect on water quality and beneficial uses." The responses to our comments and the Final EIR do not describe the project in sufficient detail, answer our questions, or alleviate our concerns. We urge the City not to certify this EIR until these shortcomings are corrected.

It appears from the Final EIR that the project has the potential to cause significant unmitigable impacts. This is likely to greatly complicate issuance of Clean Water Act Section 401 certification by the Regional Board.

Comments regarding this letter should be forwarded to Ms. Chiara Clemente at (858) 467-2359 or cclemente@waterboards.ca.gov. Written correspondence should be sent to the address above.

Respectfully,


JOHN H. ROBERTUS
Executive Officer

JHR:cmc

California Environmental Protection Agency



California Regional Water Quality Control Board

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February 28, 2005

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If you have any questions regarding this letter, please contact Ms. Stacey Baczkowski at 858-637-5594 or sbaczkowski@waterboards.ca.gov.

Respectfully,


John H. Robertus
Executive Officer

cc: California Department of Fish and Game; Ms. Elizabeth Lucas
U.S. Fish and Wildlife Service; Ms. Carolyn Lieberman



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SAN DIEGO HIGHWAY DEVELOPMENT ASSOCIATION

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Erik Ruehr

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Susan Morrison
Environmental Planner
City of San Diego Planning Department
1010 Second Avenue, MS 614C
San Diego, CA 92101

December 16, 2015

Re: Scope of Work for a Draft Environmental Impact Report for the University
Community Plan Amendment Project

Dear Ms. Morrison:

The San Diego Highway Development Association (SDHDA) fosters the timely, orderly and efficient development of all planned transportation facilities in the San Diego region and promotes the appropriate means to finance and maintain those facilities.

SDHDA received the Notice of Preparation for the referenced Environmental Impact Report on December 2 and we are respectfully requesting an extension of the deadline for submission of comments. Our Board does not meet in December and many of our members will be out of town for the Christmas Holiday. A 30-day comment period does not allow us sufficient time for key members to review the proposed scope of work, prepare comments, and submit them to our Board for approval.

Please reissue the Notice of Preparation to extend the comment period to 60 days.

We look forward to working with you and other City staff on this important project. Please feel free to contact me if you have any questions.

Sincerely,

Les Hopper
President, San Diego Highway Development Association

SCOPE OF WORK

San Clemente and Rose Canyon Mitigation Projects Additional Habitat Restoration Maintenance

Project Overview

The San Clemente and Rose Canyon Mitigation projects are habitat restoration projects that created wetlands, enhanced wetlands, and restored upland habitat to satisfy habitat mitigation needs of the Public Utilities Department. Both sites completed the 5 years of maintenance but have not received full agency sign off. While the City awaits regulatory approval and sign-off for the completion of the projects, additional maintenance to keep the sites free of weeds and debris is required.

Scope of Work

The scope of work under this contract shall consist of trash removal, watering of select planted trees and weeding.

Watering

Due to severe drought conditions some of the larger trees on both sites are showing signs of stress. Trees outlined below shall be watered:

San Clemente- 25 western sycamore trees at Regents Site shall be watered with a minimum of 8-10 gallons each watering visit.

Rose Canyon- 100 coast live oak trees need watering at the Rose Canyon Site. Each oak shall receive a minimum of 5 gallons per watering visit.

Maintenance

Maintenance at each site shall include removal of trash and debris and weed eradication. All trash and debris shall be collected from the site and disposed off at a licensed landfill facility. All invasive non-native weeds shall be targeted for eradication from both sites. All weeds over 6 inches in height shall be physically removed from the site along with any seed material. Smaller weeds may be treated with herbicide and left in place with the permission of the City. Weed debris collected from the project site shall be disposed of at a legally acceptable landfill facility. Maintenance shall be completed throughout the entirety of each site.

General

The Contractor shall be responsible for ensuring that care is taken so that existing native vegetation is not trampled or impacted throughout the duration of the work. Access to the restoration sites will be off of Regents Road and Genesee Avenue via an existing dirt roadway. Access into the restoration site is by foot only. Trucks may be parked on the dirt access road adjacent to each site with the coordination and permission of the Park and Recreation Department. No additional impacts to native habitat will occur as a result of continued maintenance to the restoration sites. The Contractor shall be responsible for ensuring that all litter, including lunch packaging, tobacco debris, and all trash is removed from the job site at the end of each working day. The Contractor shall also be responsible for ensuring that all work is performed with appropriate personal protection gear and shall ensure that necessary safety procedures and precautions are exercised at all times.

Permit Conditions

The Project is located in an environmentally sensitive area and any work associated with the restoration areas must remain in the designated locations. All work performed for the Project must adhere to any and all applicable permit conditions.

Qualifications

Contractors shall have personnel who are capable of identifying native and non-native floral species. The Contractor shall submit to the Public Utilities Environmental Section the job foreman's name, address, phone number, number of persons assigned to the project, and work schedule for the above tasks prior to performing any field work on the project.

Bid Requirements

Contractors must possess current C-27 and Pesticide Applicator's Licenses. Contractors must also possess liability insurance of a minimum of \$1,000,000 which names the City as additionally insured to be eligible for this contract. Proof of required licenses shall be submitted with cost estimate. Evidence of liability insurance shall be required prior to starting work onsite.

Bid Items

Contractors shall use the attached price proposal form to submit their cost estimate. A \$1,000 allowance has been allotted to cover extraordinary labor which may be necessary to complete the project. No expenditure of this allowance is authorized without prior City approval.

City contracts require compliance with Prevailing Wage and Living Wage Ordinances.

Bids will be accepted no later than 2:00 p.m. Monday, November 3, 2014. Please email bids to the address below.

Keli Balo
City of San Diego, Public Utilities
(858) 292-6423 (voice)
kbalo@sandiego.gov

Attachments: Price Proposal Form
San Clemente Mitigation Site Maps
Rose Canyon Mitigation Site Maps

**San Clemente and Rose Canyon Mitigation Projects
Additional Habitat Restoration Maintenance
Price Proposal Form**

ITEM NO.	DESCRIPTION	QUANTITY	UNIT	UNIT PRICE	AMOUNT
Unit Cost Items					
1	Watering of Western Sycamores at San Clemente Canyon	2	Watering Visit		
2	Watering of Oak Trees at Rose Canyon	2	Watering Visit		
3	Maintenance at San Clemente Site	4	Each Visit		
4	Maintenance at Rose Canyon	6	Each Visit		
Lump Sum Items					
5	Extraordinary labor items (Allowance Item)	Lump Sum	N/A	N/A	\$1,000
6	TOTAL FOR PROPOSAL – (ITEMS 1 - 5 INCLUSIVE) Bid Complies with Living Wage Ordinance				

Signature

Date

Print Name

Company Name

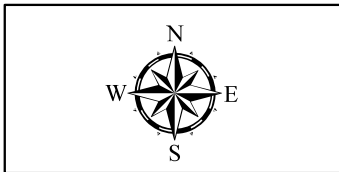
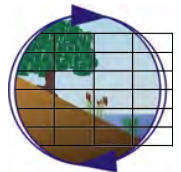
Attach:

- A. C-27 License Number
- B. Applicator License Information



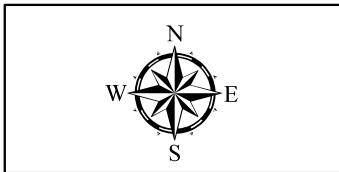
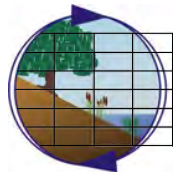
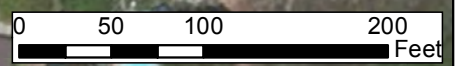
Final Mitigation Habitat Distribution
Rose Canyon Upland and Wetland Mitigation Project

Figure 2



San Clemente Canyon Mitigation Project
 Regents Road Site

Figure 2a



San Clemente Canyon Mitigation Project
Genesee Avenue Site

Figure 2b



San Diego County Archaeological Society, Inc.

Environmental Review Committee

3 January 2016

To: Ms. Susan Morrison
Planning Department
City of San Diego
1010 Second Avenue, Mail Station 614C
San Diego, California 92101

Subject: Notice of Preparation of a Draft Environmental Impact Report
University Community Plan Amendment

Dear Ms. Morrison:

Thank you for the Notice of Preparation for the subject project, received by this Society last month.

We are pleased to note the inclusion of historical resources in the list of subject areas to be addressed in the DEIR, and look forward to reviewing it during the upcoming public comment period. To that end, please include us in the distribution of the DEIR, and also provide us with a copy of the cultural resources technical report(s).

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

Sincerely,


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

cc: SDCAS President
File



CITY OF SAN DIEGO

PLANNING DEPARTMENT
ENVIRONMENTAL ANALYSIS
PUBLIC SCOPING MEETING

University Community Plan Amendment / DECEMBER 16, 2015

This meeting is being held pursuant to the *California Public Resources Code Section 21083.9 et seq.*, and is provided to give the public and interested parties an opportunity to submit comments regarding the potential environmental impacts of the proposed project. This information will be used to develop the scope and content of the proposed Environmental Impact Report (EIR) for the project to be described at this meeting. Please record your comments in the space provided below and submit this form to City staff at the conclusion of the meeting or you can mail to the address noted on the back of this form. Thank You.

Comments: With the San Diego City Council
unanimously approving the new Climate
Action Plans this week, a roadway
and bridge thru an openspace park,
is totally unnecessary. We do not
need a new roadway in University
City. The idea of putting a road over
Rose Canyon is not a well-thought out
solution to the traffic (an extra 10 mins
a day) on Genesee. If you want to solve
that "problem," solve it on Genesee.
Please do not destroy our beautiful canyon.
Thank you.

Name Shelley Plumb Signature Shelley Plumb
Address 5952 Scripps St, San Diego, 92122

Use back of sheet if additional space is necessary.

SHUTE MIHALY
& WEINBERGER LLP

396 HAYES STREET, SAN FRANCISCO, CA 94102
T: (415) 552-7272 F: (415) 552-5816
www.smwlaw.com

LAUREL L. IMPETT, AICP
Urban Planner
impett@smwlaw.com

December 23, 2015

Via Federal Express

Susan Morrison, Environmental Planner
City of San Diego Planning Department
1010 Second Avenue, MS 614C
San Diego, CA 92101
PlanningCEQA@sandiego.gov

**Re: Notice of Preparation of an Environmental Impact Report in
Connection With the University Community Plan Amendment**

Dear Ms. Morrison:

This firm represents Friends of Rose Canyon (“FRC”) in connection with the proposed amendment of the University Community Plan (“Plan Amendment” or “Project”). FRC supports the City’s efforts to amend the Plan and specifically to remove the Regents Road Bridge and Genesee Avenue Widening projects (jointly referred to as “the roadway projects”) from the existing Community Plan. While FRC is focused on removal of the threat the Bridge poses to Rose Canyon, FRC is pleased that the City will consider also removing the Genesee Avenue Widening project at the same time the Bridge Project is eliminated.

FRC is committed to working constructively with the City to ensure that the environmental impact report (“EIR”) for the Plan Amendment complies with the California Environmental Quality Act (“CEQA”), Public Resources Code § 21000 et seq., and the CEQA Guidelines, California Code of Regulations, title 14, § 15000 et seq. (“Guidelines”). To this end, we appreciate the opportunity to provide comments on the Notice of Preparation (“NOP”) for the Project.

As an initial matter, it appears likely that many of the environmental impacts that would result from removing the roadway projects from the Community Plan would be beneficial. Typically, environmental documents address a project’s adverse impacts as that analysis triggers the requirement to impose mitigation measures. CEQA Guidelines § 15126.4. Here, rather than ignore or downplay the positive or beneficial impacts

resulting from the Project, e.g., biological resources, water quality, visual resources, noise, etc., we urge the DEIR preparers to fully disclose these positive effects. It is only when the decision-makers are presented with all of the information from the Plan Amendment – adverse and beneficial – that they will be able to make an informed decision on the Project.

The following provides general suggestions for preparation of the DEIR.

1. Project Description

One of CEQA's fundamental requirements is that an EIR contain an accurate and complete project description. *See County of Inyo v. City of Los Angeles*, 71 Cal. App. 3d 185 (1977); *see also* 14 Cal. Code Regs. § 15124 ("CEQA Guidelines"). A clear and comprehensive project description is the *sine qua non* for meaningful public review. Without it, the public cannot be assured that the environmental impacts of the entire Project have been considered in the EIR.

It will be critically important that the DEIR's Project Description contain a statement of the objectives sought by the Plan Amendment. The statement of objectives should include the underlying purpose, i.e., the City's vision for the Project. CEQA Guidelines § 15124 (b). In this instance, clearly written objectives are very important as the underlying purpose of the Project is to remove the roadway projects from the Community Plan, yet the alternatives under consideration call for construction of these same projects. *See* NOP at 2. Unless the EIR includes clear objectives, it will be difficult for decision-makers to have sufficient guidance to evaluate how the Project and each alternative would achieve the City's vision.

Current trends make it clear that transportation must be sustainable. Ample studies now confirm that increases in highway capacity, e.g., new roadways such as the Regents Road Bridge or widened highways such as the Genesee Avenue Widening project encourage additional motorists to travel on these new and/or widened highways. *See e.g.*, S. Handy and M. Boarnet, California Air Resources Board, Policy Brief in the Impact of Highway Capacity and Induced Travel on Passenger Vehicle Use and Greenhouse Gas Emissions, September, 30, 2014, at 4, 5, attached as Exhibit 1. Because increased roadway capacity encourages additional driving, it also leads to increased vehicle miles traveled and greenhouse gas ("GHG") emissions. Moving away from an auto-centric approach to travel is critical not only to slow climate change, but also to

ensure proper management of the City's economic, social and environmental capital. To this end, we recommend the DEIR include objectives such as:¹

- Plan for a sustainable and balanced, multimodal transportation network that meets the needs of all users of roadways: single-occupant vehicles, carpools public transit, bicyclists and pedestrians.
- Design and operate city streets based on a "Complete Streets" concept that enables safe, comfortable, and attractive access and travel for pedestrians, bicyclists, motorists, and transit users.
- Promote efficient use of existing transportation facilities through the implementation of transportation demand management concept.
- Establish travel demand management programs to reduce peak-hour traffic congestion and help reduce regional vehicle miles traveled.
- Support local and regional air quality, sustainability, and climate change goals through transportation management.
- Emphasize transportation projects and programs that will contribute to a reduction in vehicles miles traveled per capita, while maintaining economic vitality and sustainability.
- Protect the environment, the livability of our neighborhoods, and the health of our residents by improving air quality and encouraging active transportation, e.g., bicycling and walking.
- Promote greater linkages between land uses and transit, as well as non-vehicular modes of transportation to reduce vehicular trip related emissions.
- Ensure that transportation projects do not adversely effect the City's diminishing open space resources or its sensitive biological resources.

¹ The majority of these objectives are taken from, or modeled after, the Office of Planning and Research's ("OPR") Public Draft General Plan Guidelines, October 2015 available at: https://www.opr.ca.gov/docs/DRAFT_General_Plan_Guidelines_for_public_comment_2015.pdf, accessed December 18, 2015.

2. Environmental Setting

Often EIRs are inadequate due to omissions in the description of the Project's environmental setting. Here it will be important for the DEIR to provide a comprehensive description of the Project's study area including Rose Canyon and the Rose Canyon Open Space Park.

The University City Plan recognizes Rose Canyon Park as a "regional resource," and as an important scenic asset to the community. Community Plan at 217, 218. Indeed, Rose Canyon is an oasis in an otherwise urbanized city that is already deficient in parks. The City has a shortfall of almost 50 acres of population-based park land. *Id.* at 236. Although the City has approved numerous residential projects since the Community Plan was adopted in 1987 -- such as Monte Verde, La Jolla Crossroads I, La Jolla Crossroads II, and Westfield -- it has not created any additional parks.

Rose Canyon also provides habitat for numerous sensitive species and other wildlife. Coastal sage scrub and chaparral cover hills and fields, an oak woodland exists on the north-facing hillsides, while a very rare riparian habitat runs the length of the Park.² Rose Creek naturally meanders around the canyon floor, which continues to deepen and widen until it drains into Mission Bay. Because of Rose Canyon's importance to the human population and wildlife species, the Community Plan aptly calls for its preservation as dedicated open space. *Id.* at 225.

3. Environmental Impacts Analysis

Analysis of environmental impacts must be guided by CEQA's fundamental purpose of "inform[ing] the public and responsible officials of the environmental consequences of their decisions before they are made." *Laurel Heights Improvement Ass'n v. Regents of the Univ. of Cal.*, 6 Cal. 4th 1112, 1123 (1988). To accomplish this purpose, an EIR must be detailed, complete, and reflect a good faith effort at full disclosure. CEQA Guidelines § 15151. It must contain facts and analysis, not just an agency's bare conclusions. *See Citizens of Goleta Valley v. Bd. of Supervisors*, 52 Cal. 3d 553, 568 (1990). In short, the Plan Amendment DEIR should provide a sufficient degree of analysis to inform the public and decision-makers about the proposed Project's beneficial and adverse environmental impacts. The NOP describes a host of environmental topics that will be analyzed in the DEIR. Suggestions as to a few of the most salient environmental topics are discussed below.

² <http://www.sandiego.gov/park-and-recreation/parks/osp/rosecan1.shtml>;
accessed December 15, 2015.

a. Biological Resources and Wetlands

The DEIR must assess whether the Project or its alternatives would have an adverse effect on special status species or their habitat, on any riparian habitat, or on protected wetlands. The DEIR must also assess whether the Project or its alternatives would conflict with federal, state and local policies protecting biological resources. The NOP contains a list of issues that will be addressed in the DEIR but does not identify the proposed study areas (which will differ by species), the thresholds of significance, or potential mitigation measures.

Attached are three letters from the United States Fish and Wildlife Service (“USFWS”) and the California Department of Fish and Wildlife (“CDFW”) on the EIR for the University City North/South Transportation Corridor Study. These agencies raise important issues in connection with the Regents Road Bridge and the Genesee Avenue Widening projects. *See* Letters from Therese O’Rourke, USFWS and Williams Tippetts, CDFW, April 15, 2004 letter on the Notice of Preparation, undated letter on the DEIR, and July 31, 2006 letter on the FEIR, attached as Exhibits 2, 3 and 4. We respectfully request that the DEIR preparers familiarize themselves with the issues raised by the wildlife agencies and evaluate the pertinent impacts in the DEIR.

For example, it will be important to thoroughly document the fact that the No Project alternative, i.e., the construction of the Regents Road Bridge and the Genesee Avenue Widening projects would have numerous significant impacts to sensitive biological species. Portions of the study area are within the Multiple Habitat Planning Area (“MHPA”) of the City’s Multiple Species Conservation Program (“MSCP”) Subarea Plan. The alignment of the Bridge, for example, would have a 110-foot right-of-way through the middle of the MHPA. The MSCP Subarea Plan potentially allows for the placement of roads within the MHPA if they are identified in a community plan. Such roads however must conform to the General Planning Policies and Design Guidelines in the Subarea Plan. Two of these policies are that: (1) construction and maintenance activities in wildlife corridors must avoid significant disruption of corridor usage; and (2) development in canyon bottoms should be avoided when feasible. Because the Regents Road Bridge was clearly inconsistent with these policies, USFWS and CDFW strongly recommended that the Bridge not be approved and that it be removed from the University Community Plan.³ The DEIR should address these important policies and design guidelines.

³ The Regents Road Bridge would encroach upon the wildlife corridor within Rose Canyon. *See* City of San Diego Wildlife Corridors attached as Exhibit 9.

The roadway projects would also adversely impact sensitive wildlife species and habitats. Specifically, they would directly and indirectly impact the California gnatcatcher, yellow-breasted chat, California thrasher, white-tailed kite, clay field goldenbush, and yellow warbler. The Bridge would also destroy sensitive habitats including wetlands and southern willow scrub.

Moreover, the Bridge would be built amidst a series of major wetland and upland mitigation projects. In 2007, the City approved the Rose Canyon Mitigation Project which created approximately 4.36 acres of oak riparian forest, southern cottonwood-willow riparian forest, and mule fat scrub adjacent to Rose Creek. As a part of this Mitigation Project, approximately 3.67 acres of Diegan coastal sage scrub habitat was planted on the upland areas. *See* Canyon Sewer Cleaning Program and Long Term Sewer Maintenance Program Progress Report, excerpts, at 21, and Figure 4 (page 22), attached as Exhibit 5. The Mitigation Project has completed five years of maintenance and recently received Army Corps of Engineers regulatory sign-off. *See* Scope of Work San Clemente and Rose Canyon Mitigation Projects -- Additional Habitat Restoration Maintenance, attached as Exhibit 6. Vegetative cover at the restoration site is very high, uplands habitat exceeds 80% cover and has a high diversity of species that includes California sagebrush (*Artemisia californica*), white sage (*Salvia apiana*), coyote bush (*Baccharis pilularis*), and San Diego goldenbush (*Isocoma menziessii*). The wetland creation habitat exceeds 100% cover in sections of the restoration area with canopy height reaching 10 to 15 feet. *See* Exhibit 5 (Canyon Sewer Cleaning Program) at 21, 22. The Plan Amendment DEIR should evaluate how each of the Project alternatives would impact the sensitive habitats that were created through this Mitigation Project.

Construction of the Bridge project would also adversely impact a restoration site created by the City with funding from the California Department of Parks and Recreation ("DPR") Habitat Conservation Fund Program ("HCFP"). The DPR's procedural guide for the HCFP places restrictions on any activities within this restoration site. *See* letter from P. Keating, Chief Office of Grants and Local Services, to T. Medina, Director, City of San Diego Parks and Recreation Department, August 4, 2006, attached as Exhibit 7. By entering into this Agreement, the City committed to preserving the restoration area in perpetuity. *See* Procedural Guide For the Habitat Conservation Fund Program, California State Parks, May 1997, attached as Exhibit 8. Moreover, any change to the use of this area other than for the purposes of the 1990 Wildlife Protection Act would require an act of the State legislature. *Id.* The Plan Amendment DEIR should evaluate how each of the Project alternatives would impact this restoration site.

A detailed analysis of the aforementioned impacts to biological resources must be prepared by a qualified, independent biologist. The DEIR's biological resources study must be based on surveys and detailed field studies for each species potentially in the area. A search of the California Natural Diversity Database ("CNDDDB") maintained by

CDFW is a good starting point, but it is not sufficient to provide the level of detail necessary for the EIR. Detailed field studies and surveys must be the basis for the analysis. It is essential that the DEIR contain clear maps identifying the biological resources of importance overlaid with any of the alternatives that involve the construction of a roadway project.

b. Transportation/Circulation

The analysis of the Plan Amendment's effect on transportation will of course be quite important. As the City is aware, the state is on the cusp of adopting new guidelines to be used by lead agencies in their evaluation of a project's impacts on transportation. Largely as a result of SB 743, California has started a process that is all but certain to change transportation impact analysis as part of CEQA compliance. These changes will include elimination of auto delay, level of service ("LOS"), and other similar measures of vehicular capacity or traffic congestion as a basis for determining significant transportation impacts. One of the fundamental problems of using LOS to analyze a project's traffic impacts is that it often results in bigger roadway infrastructure as mitigation for a project's significant traffic impacts. According to the legislative intent contained in SB 743, these changes to current practice were necessary to more appropriately balance the needs of congestion management with statewide goals related to infill development, promotion of public health through active transportation, and reduction of GHG emissions.

Although the state has not adopted its draft guidelines for implementing SB 743, we encourage the City to take the draft guidelines into account when analyzing any transportation impacts that may result from the Plan Amendment.⁴ In this regard, we urge the DEIR preparers to not rely on a LOS methodology (or any other metric focused on automobile delay) to determine the significance of the Plan Amendment's transportation impacts.

Moreover, as discussed below, the City's recently adopted Climate Action Plan includes targets that would substantially increase transit, biking and walking mode share by 2035. *See* Climate Action Plan pps. 37-39. We encourage the DEIR's transportation impact analysis to take into account these mode share goals in its analysis of future, i.e., 2035 transportation conditions.

⁴ A copy of the draft guidelines is available at: https://www.opr.ca.gov/docs/Final_Preliminary_Discussion_Draft_of_Updates_Implementing_SB_743_080614.pdf; accessed December 14, 2015.

c. Climate Change

It is likely that the removal of the Bridge and the Genesee Avenue Widening projects would have a beneficial effect on climate change. On the other hand, the alternatives that call for building one or both of the roadway projects would increase capacity and induce travel, and would take the region in a direction that prevents achieving the State's preeminent climate goals, i.e., the State will not be able to meet its climate change goals without a reduction in motor vehicle travel.

Although the Plan Amendment's alternatives could result in a substantial increase in GHG emissions, the NOP does not provide any insight as to how the DEIR will evaluate these impacts. The NOP does state that the DEIR will evaluate the projected GHG emissions with and without the Community Plan Amendment and that these emissions will be incorporated into a qualitative discussion of the significance of the emissions relative to global climate change. We urge the City to go beyond this qualitative assessment and quantify the Project (and the alternatives') potential to increase GHG emissions.

As part of this evaluation, we also urge the City to consider appropriate thresholds of significance. The Supreme Court has recently weighed in on appropriate thresholds for GHG emissions. In *Center for Biological Diversity v. California Department of Fish and Wildlife* ("CBD"), the Court affirmed reliance on compliance with AB 32's reduction goals as a valid threshold of significance when used "as a comparative tool for evaluating efficiency and conservation efforts." 2015 WL 7708312 at *10. The DEIR should also evaluate the Project and the alternatives' potential to increase GHG emissions after 2020. To this end, the DEIR should analyze the Project's consistency with Executive Order S-3-05 and Executive Order B-30-15.

It will also be important to evaluate the Project's consistency with the City's Climate Action Plan. The Climate Plan calls for eliminating half of all GHG emissions by 2035. Since the transportation sector is one of the largest sources of sources of GHG emissions, it will be important that the DEIR analyze how the Project and its alternatives will ensure a reduction in GHG emissions.⁵

d. Water Quality

The DEIR for the Plan Amendment must determine whether development of the Project or any of the alternatives would result in the violation of any water quality

⁵ See U.S. EPA Transportation and Climate available at: <http://www3.epa.gov/otaq/climate/basicinfo.htm>; accessed December 14, 2015.

standards, deplete groundwater supplies or interfere with groundwater recharge, alter existing drainage patterns, result in substantial new amounts of polluted runoff, or increase the risk of flooding.

According to the Regional Water Quality Control Board, Rose Canyon has a variety of designated surface water beneficial uses including Contact, and Non-contact Recreation, Warm Freshwater Habitat, Cold Freshwater Habitat, and Wildlife Habitat. *See* letter from J. Robertus to M. Blake, February 28, 2005, attached as Exhibit 10. Runoff from construction and operation of the Bridge and Genesee Avenue Widening projects would result in adverse impacts to these beneficial uses. In addition, construction of the roadway projects could result in dewatering which could dry-up the wet meadows in Rose Canyon. *Id.* at 2,3. The DEIR must address these impacts.

It will also be important for the DEIR to take into account the City's new MS4 storm water regulations. In comparison to prior stormwater regulations, the MS4 regulations are considerably more stringent. If the Regents Road Bridge were constructed, it would add a large amount of new hardscape which would drain into Rose Canyon. The Genesee Avenue Widening Project would also result in a significant amount of run-off into Rose Canyon, since the canyon is the low point for everything from Nobel to Governor. The DEIR's analysis of stormwater impacts should take into account this increasingly stringent regulatory environment.

e. Land Use

In the DEIR's analysis of the Project's conflicts with environmental goals, objectives, or guidelines of a General Plan or Community Plan or other applicable land use plan, we urge the DEIR preparers to analyze the Project's consistency with the University Community Plan Open Space and Recreation Element. For example, the No Project alternative, i.e., the construction of the Bridge and the Genesee Avenue Widening projects would appear to be clearly inconsistent with the following goals and policies:

- Future uses of Rose Canyon should consider the topography, vegetation and scenic value of the canyon. For this reason, passive recreational uses are recommended rather than active uses requiring major grading and construction. UC Community Plan at 233.
- Preserve the natural resources of the community through the appropriate designation and use of open space. Major topographic features and biological resources should be preserved as undeveloped open space. *Id.* at 230.

f. Aesthetics

The DEIR must analyze the impacts of the Plan Amendment on aesthetics including scenic vistas, scenic resources (including trees), the visual character of the area, and the introduction of light or glare. This analysis must include clear graphics showing pre- and post-Project visual conditions using an appropriate technique.

4. Alternatives

CEQA emphasizes that an EIR must analyze a range of reasonable alternatives to the project. The alternatives must feasibly attain most of the basic project objectives while avoiding or substantially lessening the project's environmental impacts. *See* Public Resources Code § 21100(b)(4); *see also* CEQA Guidelines § 15126.6(a). The CEQA Guidelines state that the selection and discussion of alternatives should foster informed decision-making and informed public participation. *See* CEQA Guidelines § 15126(d)(5).

The NOP explains that the DEIR is expected to include a broad range of alternatives to the Project. Unfortunately, the NOP provides no substantive discussion as to why specific alternatives would be included. For example, according to the NOP, the DEIR will include an alternative that calls for the construction of a bridge extending over Rose Canyon for emergency access, transit, pedestrian, and bicycle use. NOP at 2. Based on this brief description, it would appear that the City has determined that the elimination of the Bridge and/or the Genesee Avenue Widening projects may adversely impact emergency response times. If this is the case, and unfortunately, the NOP provides no insight into this issue, we urge the City to evaluate other more cost efficient—and far less environmentally damaging options—for addressing emergency response impacts. For example, it is our understanding that the City is already considering the construction of additional fire stations.

In addition, the NOP states that additional alternatives beyond those already identified in the NOP could be considered as a way to reduce the Project's transportation and circulation impacts. NOP at 16. Here too, the NOP does not identify any suggested alternatives. We recommend that any additional alternatives avoid increases in highway capacity; instead, the DEIR should evaluate, identify and analyze a sustainable transportation alternative such as an increased public transit on existing roadways.

5. Conclusion

Thank you again for the opportunity to provide these comments. Please keep this office informed of all notices, hearings, staff reports, briefings, meetings, and other events related to the proposed Project. In addition, please notify us of the release of the DEIR for the Community Plan Amendment.

Very truly yours,

SHUTE, MIHALY & WEINBERGER LLP



Laurel L. Impett, AICP, Urban Planner

cc: Debby Knight, Friends of Rose Canyon

Exhibits (on CD):

- Exhibit 1 S. Handy and M. Boarnet, California Air Resources Board, Policy Brief in the Impact of Highway Capacity and Induced Travel on Passenger Vehicle Use and Greenhouse Gas Emissions, September, 30, 2014.
- Exhibit 2 Letter from Therese O'Rourke, USFWS and Williams Tippetts, CDFW, April 15, 2004 letter on the Notice of Preparation.
- Exhibit 3 Letter from Therese O'Rourke, USFWS and Williams Tippetts, CDFW, undated letter on the DEIR.
- Exhibit 4 Letter from Therese O'Rourke, USFWS and Williams Tippetts, CDFW, July 31, 2006 letter on the FEIR.

- Exhibit 5 Canyon Sewer Cleaning Program and Long Term Sewer Maintenance Program Progress Report, excerpts, September 2014.
- Exhibit 6 Scope of Work San Clemente and Rose Canyon Mitigation Projects -- Additional Habitat Restoration Maintenance.
- Exhibit 7 Letter from P. Keating, Chief Office of Grants and Local Services, to T. Medina, Director, City of San Diego Parks and Recreation Department, August 4, 2006.
- Exhibit 8 Procedural Guide For the Habitat Conservation Fund Program, California State Parks, May 1997.
- Exhibit 9 City of San Diego Wildlife Corridors.
- Exhibit 10 Letter from J. Robertus, Executive Officer, California Regional Water Quality Control Board, San Diego Region to M. Blake, Associate Planner, City of San Diego Development Services Center, February 28, 2005.

730847.3

SHUTE, MIHALY
& WEINBERGER LLP

396 HAYES STREET, SAN FRANCISCO, CA 94102
T: (415) 552-7272 F: (415) 552-5816
www.smwlaw.com

TERESA BANG
Office Clerk
bang@smwlaw.com

December 23, 2015

Via Federal Express

Susan Morrison, Environmental Planner
City of San Diego Planning Department
1010 Second Avenue, MS 614C
San Diego, CA 92101
PlanningCEQA@sandiego.gov

**Re: Notice of Preparation of an Environmental Impact Report in
Connection With the University Community Plan Amendment**

Dear Ms. Morrison,

On behalf of the Friends of Rose Canyon, please find enclosed a letter on the University City Community Plan Amendment Notice of Preparation. Also enclosed is a CD that contains the letter's exhibits.

Very truly yours,

SHUTE, MIHALY & WEINBERGER LLP



Teresa Bang, Office Clerk

SCOPE OF WORK

San Clemente and Rose Canyon Mitigation Projects Additional Habitat Restoration Maintenance

Project Overview

The San Clemente and Rose Canyon Mitigation projects are habitat restoration projects that created wetlands, enhanced wetlands, and restored upland habitat to satisfy habitat mitigation needs of the Public Utilities Department. Both sites completed the 5 years of maintenance but have not received full agency sign off. While the City awaits regulatory approval and sign-off for the completion of the projects, additional maintenance to keep the sites free of weeds and debris is required.

Scope of Work

The scope of work under this contract shall consist of trash removal, watering of select planted trees and weeding.

Watering

Due to severe drought conditions some of the larger trees on both sites are showing signs of stress. Trees outlined below shall be watered:

San Clemente- 25 western sycamore trees at Regents Site shall be watered with a minimum of 8-10 gallons each watering visit.

Rose Canyon- 100 coast live oak trees need watering at the Rose Canyon Site. Each oak shall receive a minimum of 5 gallons per watering visit.

Maintenance

Maintenance at each site shall include removal of trash and debris and weed eradication. All trash and debris shall be collected from the site and disposed off at a licensed landfill facility. All invasive non-native weeds shall be targeted for eradication from both sites. All weeds over 6 inches in height shall be physically removed from the site along with any seed material. Smaller weeds may be treated with herbicide and left in place with the permission of the City. Weed debris collected from the project site shall be disposed of at a legally acceptable landfill facility. Maintenance shall be completed throughout the entirety of each site.

General

The Contractor shall be responsible for ensuring that care is taken so that existing native vegetation is not trampled or impacted throughout the duration of the work. Access to the restoration sites will be off of Regents Road and Genesee Avenue via an existing dirt roadway. Access into the restoration site is by foot only. Trucks may be parked on the dirt access road adjacent to each site with the coordination and permission of the Park and Recreation Department. No additional impacts to native habitat will occur as a result of continued maintenance to the restoration sites. The Contractor shall be responsible for ensuring that all litter, including lunch packaging, tobacco debris, and all trash is removed from the job site at the end of each working day. The Contractor shall also be responsible for ensuring that all work is performed with appropriate personal protection gear and shall ensure that necessary safety procedures and precautions are exercised at all times.

Permit Conditions

The Project is located in an environmentally sensitive area and any work associated with the restoration areas must remain in the designated locations. All work performed for the Project must adhere to any and all applicable permit conditions.

Qualifications

Contractors shall have personnel who are capable of identifying native and non-native floral species. The Contractor shall submit to the Public Utilities Environmental Section the job foreman's name, address, phone number, number of persons assigned to the project, and work schedule for the above tasks prior to performing any field work on the project.

Bid Requirements

Contractors must possess current C-27 and Pesticide Applicator's Licenses. Contractors must also possess liability insurance of a minimum of \$1,000,000 which names the City as additionally insured to be eligible for this contract. Proof of required licenses shall be submitted with cost estimate. Evidence of liability insurance shall be required prior to starting work onsite.

Bid Items

Contractors shall use the attached price proposal form to submit their cost estimate. A \$1,000 allowance has been allotted to cover extraordinary labor which may be necessary to complete the project. No expenditure of this allowance is authorized without prior City approval.

City contracts require compliance with Prevailing Wage and Living Wage Ordinances.

Bids will be accepted no later than 2:00 p.m. Monday, November 3, 2014. Please email bids to the address below.

Keli Balo
City of San Diego, Public Utilities
(858) 292-6423 (voice)
kbalo@sandiego.gov

Attachments: Price Proposal Form
San Clemente Mitigation Site Maps
Rose Canyon Mitigation Site Maps

**San Clemente and Rose Canyon Mitigation Projects
Additional Habitat Restoration Maintenance
Price Proposal Form**

ITEM NO.	DESCRIPTION	QUANTITY	UNIT	UNIT PRICE	AMOUNT
Unit Cost Items					
1	Watering of Western Sycamores at San Clemente Canyon	2	Watering Visit		
2	Watering of Oak Trees at Rose Canyon	2	Watering Visit		
3	Maintenance at San Clemente Site	4	Each Visit		
4	Maintenance at Rose Canyon	6	Each Visit		
Lump Sum Items					
5	Extraordinary labor items (Allowance Item)	Lump Sum	N/A	N/A	\$1,000
6	TOTAL FOR PROPOSAL – (ITEMS 1 - 5 INCLUSIVE) Bid Complies with Living Wage Ordinance				

Signature

Date

Print Name

Company Name

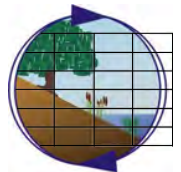
Attach:

- A. C-27 License Number
- B. Applicator License Information



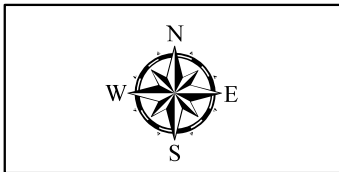
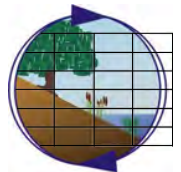
Final Mitigation Habitat Distribution
 Rose Canyon Upland and Wetland Mitigation Project

Figure 2



San Clemente Canyon Mitigation Project
 Regents Road Site

Figure 2a



San Clemente Canyon Mitigation Project
Genesee Avenue Site

Figure 2b



Edmund G. Brown Jr.
Governor

STATE OF CALIFORNIA
Governor's Office of Planning and Research
State Clearinghouse and Planning Unit



Ken Alex
Director

Notice of Preparation

December 2, 2015

To: Reviewing Agencies
Re: University Community Plan Amendment
SCH# 2015121011

Attached for your review and comment is the Notice of Preparation (NOP) for the University Community Plan Amendment draft Environmental Impact Report (EIR).

Responsible agencies must transmit their comments on the scope and content of the NOP, focusing on specific information related to their own statutory responsibility, within 30 days of receipt of the NOP from the Lead Agency. This is a courtesy notice provided by the State Clearinghouse with a reminder for you to comment in a timely manner. We encourage other agencies to also respond to this notice and express their concerns early in the environmental review process.

Please direct your comments to:

Susan Morrison
City of San Diego
1010 Second Avenue, Suite 1400, MS 614C
San Diego, CA 92101

with a copy to the State Clearinghouse in the Office of Planning and Research. Please refer to the SCH number noted above in all correspondence concerning this project.

If you have any questions about the environmental document review process, please call the State Clearinghouse at (916) 445-0613.

Sincerely,

Scott Morgan
Director, State Clearinghouse

Attachments
cc: Lead Agency

**Document Details Report
State Clearinghouse Data Base**

SCH# 2015121011
Project Title University Community Plan Amendment
Lead Agency San Diego, City of

Type NOP Notice of Preparation
Description This project analyzes the impacts related to removing the Genesee Avenue widening and Regents Road Bridge projects from the University Community Plan (UCP) Transportation Element, as well as five (5) project alternatives which consist of variations of including and removing the Genesee Avenue widening and Regents Road Bridge projects.

Lead Agency Contact

Name Susan Morrison
Agency City of San Diego
Phone (619) 533-6492 **Fax**
email
Address 1010 Second Avenue, Suite 1400, MS 614C
City San Diego **State** CA **Zip** 92101

Project Location

County San Diego
City
Region
Cross Streets Regents Rd/Governor Dr, Genesee Ave, Nobel Dr, La Jolla Village Dr/Miramar Rd, La Jolla Farms Rd
Lat / Long
Parcel No.
Township **Range** **Section** **Base**

Proximity to:

Highways I-5, I-805, SR 52, SR 56
Airports MCAS Miramar
Railways San Diego Trolley, Atchinson,
Waterways Pacific Ocean, Los Penasquitos Lagoon, Penasquitos Creek
Schools Multiple, including UCSD
Land Use

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

Reviewing Agencies Resources Agency; California Coastal Commission; Department of Conservation; Department of Parks and Recreation; Department of Water Resources; Department of Fish and Wildlife, Region 5; Native American Heritage Commission; Public Utilities Commission; State Lands Commission; Caltrans, Division of Aeronautics; California Highway Patrol; Caltrans, District 11; Air Resources Board, Transportation Projects; Regional Water Quality Control Board, Region 9; Caltrans, Division of Transportation Planning

Date Received 12/02/2015 **Start of Review** 12/02/2015 **End of Review** 01/04/2016

Notice of Completion & Environmental Document Transmittal

Mail to: State Clearinghouse, P. O. Box 3044, Sacramento, CA 95812-3044 (916) 445-0613
 For Hand Delivery/Street Address: 1400 Tenth Street, Sacramento, CA 95814

SCH # 15121011

Project Title: UNIVERSITY COMMUNITY PLAN AMENDMENT

Lead Agency: City of San Diego Contact Person: Susan Morrison
 Mailing Address: 1010 Second Avenue, Suite 1400, MS 614C Phone: (619) 533-6492
 City: San Diego, CA Zip: 92101 County: San Diego

Project Location: County: San Diego City/Nearest Community: University

Cross Streets: Regents Road/Governor Drive, Genesee Avenue, Nobel Drive, La Jolla Village Drive/Miramar Road, La Jolla Farms Road, Sorrento Valley Road, North Torrey Pines Road, Gilman Drive
 Zip Code: 92122

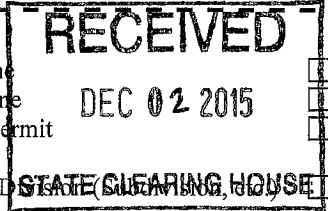
Lat. / Long.: N / W Total Acres: Approximately 8,500
 Assessor's Parcel No.: _____ Section: _____ Twp.: _____ Range: _____ Base: _____
 Within 2 Miles: State Hwy #: I-5, I-805, SR 52, SR 56 Waterways: Pacific Ocean, Los Peñasquitos Lagoon, Peñasquitos Creek
 Airports: MCAS Miramar Railways: San Diego Trolley, Atchinson, Topeka, and Santa Fe Railroad
 Schools: Multiple, including UCSD

Document Type:

CEQA: NOP Draft EIR NEPA: NOI Other: Joint Document
 Early Cons Supplement/Subsequent EIR EA Final Document
 Neg Dec (Prior SCH No.) _____ Draft EIS Other _____
 Mit Neg Dec Other _____ FONSI

Local Action Type:

General Plan Update Specific Plan Rezone Annexation
 General Plan Amendment Master Plan Prezone Redevelopment
 General Plan Element Planned Unit Development Use Permit Coastal Permit
 Community Plan Amendment Site Plan Land Use Change Other: _____



Development Type:

Residential: Units _____ Acres _____ Water Facilities: Type _____ MGD _____
 Office: Sq.ft. _____ Acres _____ Employees _____ Transportation: Type _____
 Commercial: Sq.ft. _____ Acres _____ Employees _____ Mining: Mineral _____
 Industrial: Sq.ft. _____ Acres _____ Employees _____ Power: Type _____ MW _____
 Educational _____ Waste Treatment: Type _____ MGD _____
 Recreational _____ Hazardous Waste: Type _____
 Other: _____

Project Issues Discussed in Document:

Aesthetic/Visual Fiscal Recreation/Parks Vegetation
 Agricultural Land Flood Plain/Flooding Schools/Universities Water Quality
 Air Quality Forest Land/Fire Hazard Septic Systems Water Supply/Groundwater
 Archeological/Historical Geologic/Seismic Sewer Capacity Wetland/Riparian
 Biological Resources Minerals Soil Erosion/Compaction/Grading Wildlife
 Coastal Zone Noise Solid Waste Growth Inducing
 Drainage/Absorption Population/Housing Balance Toxic/Hazardous Land Use
 Economic/Jobs Public Services/Facilities Traffic/Circulation Cumulative Effects
 Other Neighborhood Character, GHG, Energy, Paleontological Resources, Hydrology

Present Land Use/Zoning/General Plan Designation: Mix of residential, commercial, light industrial, institutional, parks, open space, military

Project Description: *(please use a separate page if necessary)*

See Next Sheet

Resources Agency

Resources Agency
Nadell Gayou

Dept. of Boating & Waterways
Denise Peterson

California Coastal Commission
Elizabeth A. Fuchs

Colorado River Board
Lisa Johansen

Dept. of Conservation
Elizabeth Carpenter

California Energy Commission
Eric Knight

Cal Fire
Dan Foster

Central Valley Flood Protection Board
James Herota

Office of Historic Preservation
Ron Parsons

Dept of Parks & Recreation Environmental Stewardship Section

California Department of Resources, Recycling & Recovery
Sue O'Leary

S.F. Bay Conservation & Dev't. Comm.
Steve McAdam

Dept. of Water Resources
Nadell Gayou

Fish and Game

Dept. of Fish & Wildlife
Scott Flint

Environmental Services Division
Fish & Wildlife Region 1
Curt Babcock

Fish & Wildlife Region 1E
Laurie Harnsberger

Fish & Wildlife Region 2
Jeff Drongesen

Fish & Wildlife Region 3
Charles Armor

Fish & Wildlife Region 4
Julie Vance

Fish & Wildlife Region 5
Leslie Newton-Reed
Habitat Conservation Program

Fish & Wildlife Region 6
Tiffany Ellis
Habitat Conservation Program

Fish & Wildlife Region 6 I/M
Heidi Calvert
Inyo/Mono, Habitat Conservation Program

Dept. of Fish & Wildlife M
George Isaac
Marine Region

Other Departments

Food & Agriculture
Sandra Schubert
Dept. of Food and Agriculture

Dept. of General Services
Public School Construction

Dept. of General Services
Anna Garbeif
Environmental Services Section

Delta Stewardship Council
Kevan Samsam

Housing & Comm. Dev.
CEQA Coordinator
Housing Policy Division

Independent Commissions, Boards

Delta Protection Commission
Michael Machado

OES (Office of Emergency Services)
Marcia Scully

Native American Heritage Comm.
Debbie Treadway

Public Utilities Commission Supervisor

Santa Monica Bay Restoration
Guangyu Wang

State Lands Commission
Jennifer Deleong

Tahoe Regional Planning Agency (TRPA)
Cherry Jacques

Cal State Transportation Agency CalSTA

Caltrans - Division of Aeronautics
Philip Crimmins

Caltrans - Planning
HQ LD-IGR
Terri Pencovic

California Highway Patrol
Suzann Ikeuchi
Office of Special Projects

Dept. of Transportation

Caltrans, District 1
Rex Jackman

Caltrans, District 2
Marcelino Gonzalez

Caltrans, District 3
Eric Federicks - South
Susan Zanchi - North

Caltrans, District 4
Patricia Maurice

Caltrans, District 5
Larry Newland

Caltrans, District 6
Michael Navarro

Caltrans, District 7
Dianna Watson

Caltrans, District 8
Mark Roberts

Caltrans, District 9
Gayle Rosander

Caltrans, District 10
Tom Dumas

Caltrans, District 11
Jacob Armstrong

Caltrans, District 12
Maureen El Harake

Cal EPA

Air Resources Board

All Other Projects
Cathi Slaminski

Transportation Projects
Nesamani Kalandyur

Industrial/Energy Projects
Mike Tollstrup

State Water Resources Control Board
Regional Programs Unit
Division of Financial Assistance

State Water Resources Control Board
Karen Larsen
Division of Drinking Water

State Water Resources Control Board
Student Intern, 401 Water Quality Certification Unit
Division of Water Quality

State Water Resources Control Board
Phil Crader
Division of Water Rights

Dept. of Toxic Substances Control
CEQA Tracking Center

Department of Pesticide Regulation
CEQA Coordinator

Regional Water Quality Control Board (RWQCB)

RWQCB 1
Cathleen Hudson
North Coast Region (1)

RWQCB 2
Environmental Document Coordinator
San Francisco Bay Region (2)

RWQCB 3
Central Coast Region (3)

RWQCB 4
Teresa Rodgers
Los Angeles Region (4)

RWQCB 5S
Central Valley Region (5)

RWQCB 5F
Central Valley Region (5)
Fresno Branch Office

RWQCB 5R
Central Valley Region (5)
Redding Branch Office

RWQCB 6
Lahontan Region (6)

RWQCB 6V
Lahontan Region (6)
Victorville Branch Office

RWQCB 7
Colorado River Basin Region (7)

RWQCB 8
Santa Ana Region (8)

RWQCB 9
San Diego Region (9)

Other

Conservancy



AUG 04 2006

Mr. Ted Medina, Director
Parks and Recreation Department
202 C Street, MS-9B
San Diego, CA 92101

Re: DPR Project Number: HR 37-005 -- ROSE CANYON OPEN SPACE PARK

Dear Mr. Medina,

This letter is to confirm the telephone conference call on July 24, 2006 the Office of Grants and Local Services (OGALS) had with your staff regarding a pending issue on the above Habitat Conservation Fund (HCF) project. We were following up on a letter from the City of San Diego (City) dated October 24, 2005 requesting OGALS to review and provide direction for the City regarding the proposed Regents Road Bridge. My apologies for the time it took OGALS to get back to the City on this request.

OGALS also wants to use this letter to clarify California State Parks (CSP) authority relative to any change in use of the grant project area, and CSP's continued oversight of any land which benefited from HCF program.

Contract Provision H (1), found on page 73 of the Procedural Guide for the Habitat Conservation Fund Program (Procedural Guide) states that the "Applicant agrees that the property acquired or developed with grant moneys under this agreement shall be used by the Applicant only for the purposes of the California Wildlife Protection Act of 1990 and no other use, sale, or other disposition of the area shall be permitted except by specific act of the Legislature." Therefore under the HCF, CSP does not have the authority to approve changes to the use, sale or disposition of any grant-funded property.

Contract Section H (2), also on page 73 of the Procedural Guide, outlines CSP's ongoing oversight of grant-funded property. This section states that "The Applicant agrees to maintain and operate in perpetuity the property acquired, developed, restored or enhanced with these funds." Based on this contractual agreement between the grantee and CSP, it is the grantee's responsibility to inform CSP of any changes to this agreement. Therefore, if the City decides to proceed with any proposals which would impact the Rose Canyon Open Space Park, it must inform CSP by letter to OGALS, the administrator of the HCF for CSP.

Mr. Ted Medina

AUG 04 2006
Page Two

Hopefully this addresses the City's questions regarding options associated with changes to grant-funded property. If you have further questions, please contact me at (916) 651-8597 or by email at pkeat@parks.ca.gov. We appreciate your interest in the HCF and for bringing the proposed Regents Bridge project to our attention.

Sincerely,



Patti Keating, Chief
Office of Grants and Local Services

Attachment

cc: April Penera, Deputy Director, San Diego DPR
Carol Wood, Grants Administrator, San Diego DPR
State Senator Kehoe
Assemblymember Saldaña
Jean Lacher, Acting Manager, OGALS
Deborah Viney, Supervisor, OGALS
✓ Bill Boston, Project Officer, OGALS



CITY OF SAN DIEGO

PLANNING DEPARTMENT
ENVIRONMENTAL ANALYSIS

PUBLIC SCOPING MEETING

University Community Plan Amendment / DECEMBER 16, 2015

This meeting is being held pursuant to the *California Public Resources Code Section 21083.9 et seq.*, and is provided to give the public and interested parties an opportunity to submit comments regarding the potential environmental impacts of the proposed project. This information will be used to develop the scope and content of the proposed Environmental Impact Report (EIR) for the project to be described at this meeting. Please record your comments in the space provided below and submit this form to City staff at the conclusion of the meeting or you can mail to the address noted on the back of this form. Thank You.

Comments:

When considering the impact of removing the Regents bridge and Genesee widening from the plan, take into account the long term effects on traffic as well as any short term effects. I am a firm believer in "if you build it, they will come" and am convinced that more lanes through UC will simply encourage more through traffic in UC, especially in years to come. Thus, removing the bridge and widening of Genesee from the plan will ultimately reduce, not increase traffic in UC. If the objective is to reduce traffic, extending the trolley, support of telecommuting and self-driving vehicles will be much more effective than sticking to an outdated plan that will encourage solo automobile trips.

Name

SUSAN FREIER

Signature

Susan Freier

Address

2946 Renault St San Diego CA 92122

Use back of sheet if additional space is necessary.

From: [Susan Traganza](#)
To: [PLN_PlanningCEQA](#)
Subject: University Community Plan Amendment
Date: Sunday, December 27, 2015 10:09:13 PM

To whom it may concern,

The following paragraph contains my Scoping Comments on the EIR on the University Community Plan Amendment.

The focus of my comments is to highlight the usage of the North side of Regents Rd. near the Von's Shopping Center in La Jolla Colony (7788 Regents Rd).

For the past 26 years, I have commuted from my home in southwest University City to Doyle Elementary where I teach. Each morning, I drive through La Jolla Colony on Palmilla Dr., Arriba St. and Regents Road to reach my school. Along this route, I consistently see many groups of parents and children walking to Doyle Elementary. In addition, I also see large numbers of UCSD students making their way to the bus stop on Arriba where the Superloop Bus picks them up. On any given day, I see at least 20-25 college age students waiting in line for the bus and/or rushing across the street to catch the bus. The combination of the UCSD students and the Doyle families walking to their destinations makes the pedestrian crosswalks in and around the Von's Shopping Center and Doyle Elementary very busy in the morning. I am constantly on alert for a child and/or UCSD student who tries to dart across Regents Rd without using the crosswalk to avoid the long wait at the stoplight. My attention also must be focused on the many bicyclists who are dodging in and out of traffic as they travel northbound on Regents Rd. Often times, these bicyclists are carrying young children who attend Doyle Elementary.

Over the years, I have watched the pedestrian traffic increase in and around the Doyle area. The fact that Doyle Park is adjacent to Doyle Elementary compounds the number of small children who use the crosswalk of Regents Rd. and Berino Ct. multiple times a day. In fact, about eight years ago, the concern for pedestrian safety at this intersection became so great, that the city had to redo the traffic light pattern. The congestion is further impacted by the fact that Berino Ct. dead ends into the Doyle campus and cars are often backed up all the way down the street.

In summary, I feel that the area in and around Doyle Elementary, Doyle Park and the Von's Shopping Center has a high volume of pedestrian traffic on a daily basis and car drivers must be vigilant to avoid collisions. If the volume of cars were to increase, I feel that pedestrian accidents would increase dramatically, especially during the morning "rush" hour. The north side of Regent's Rd. is in a very dense, residential area. It is not a place that needs more cars. If anything, the emphasis should be on decreasing the number of cars so students of all ages can get to school safely.

Respectfully submitted,

Susan Traganza
3032 Renault St.
San Diego, CA 92122

From: [Tom Hekman](#)
To: [PLN_PlanningCEQA](#)
Subject: University Community Plan Ammendment
Date: Wednesday, December 02, 2015 12:28:04 PM

To whom it may concern:

Including the Regents Road Bridge in the community plan is the only real solution for the traffic between north and south University City. The changes made to Genesee just north of Nobel have created a massive gridlock problem. It required 57 minutes the other day to travel from UCSD Thornton to Governor Drive. With the addition of even more buildings employees and patients to the UCSD and Scripps complex the need for another north south corridor is absolute.

As a parent of high school students the region of Genesee in front of UCHS has become increasingly dangerous especially with the parking modifications that has resulted in the south gate becoming a principal access point. In the morning cars speed up Genesee by the school swerving lane to lane as our children are walking to school. In the afternoon south bound traffic routinely blocks the exit from the school as the entire southbound road is bumper to bumper. Widening Genesee will not solve this problem and it will exacerbate the safety issues at the intersection of Governor and Genesee, already the location of at least one recent fatality and the principal access point for hundreds of Standley Middle School children to cross over Genesee twice a day. Widening Genesee will affect five separate apartment complexes and will create stability issues for the homes located on the mesa above Genesee to the west. In addition, since the region in front of the mall cannot be widened any further and the current plan proposes losing lane space to an elevated trolley line, the gridlock on Genesee will continue as a result of this bottleneck. Widening Genesee will have minimal effect on traffic and will significantly increase the risk to our children attending schools in the area.

Traffic on Genesee in the mornings has resulted in Governor becoming a bypass as commuters go east on Governor to take the ramp onto 805 and exit immediately at Nobel rather than going up Genesee to Nobel. This has made east bound Governor a major artery in the mornings and it is a road with houses on each side. Commuters routinely drive highway speed down Governor at exactly the time people are taking their kids to school. The current situation is unsatisfactory and widening Genesee will only create more problems.

Building the Regents Road bridge is the least intrusive and most environmentally responsible of all the proposed options. It was on the original community plan for good reason and has been blocked by a small group of people who are simply trying to keep it out of their backyard. It will produce the required traffic release and will support the expansion of the facilities on the north end of University City that are currently in progress. San Diego is not a mass transit community, we drive to work. Our road infrastructure needs to support that fact.

Thomas Hekman

5014 Via Cinta
San Diego CA 92122

San Diego Tracking Team

Rose Canyon Transect: See attached map for location of transect

Table derived from our October 2003 to December 2007 data base that shows our list of species and the average number of observations (tracks, scat, etc.) on each per quarter. So, on the average, we found evidence of bobcat 6.5 times each survey. We never found evidence of mule deer. Etc. (Note that this does not mean we found evidence of 6.5 bobcats. The evidence could be from one or more individuals; our data doesn't support population size estimates.) More recent surveys have been consistent with this data set.

Species	No. of Obs. Per Quarter
Badger	0.0
Black Tailed Jackrabbit	0.0
Bobcat	6.5
Cougar	0.0
Coyote	23.1
Gray Fox	0.6
Long Tailed Weasel	0.0
Mule Deer	0.0
Opossum	1.2
Raccoon	4.9
Ringtail	0.0
Roadrunner	0.0
Spotted Skunk	0.0
Woodrat/Packrat	4.8





U.S. Fish and Wildlife Service
Carlsbad Fish and Wildlife Office
6010 Hidden Valley Road
Carlsbad, California 92009
(760) 431-9440
FAX (760) 431-5902 + 9618



CA. Department of Fish and Game
South Coast Regional Office
4949 Viewridge Avenue
San Diego, CA 92123
(858) 467-4201
FAX (858) 467-4299

In Reply Refer to: FWS-SDG-3970.2

Ms. Martha Blake, Associate Planner
City of San Diego
Development Services Center
1222 First Avenue, MS 501
San Diego California 92101

Re: Draft Environmental Impact Report for the University City North/South Transportation
Corridor Study (SCH# 2004031011)

Dear Ms. Blake:

The U.S. Fish and Wildlife Service (Service) and the California Department of Fish and Game (Department), collectively the "Wildlife Agencies," have reviewed the above-referenced draft Environmental Impact Report (DEIR) for the University City North/South Transportation Corridor Study (Transportation Study), which we received on November 29, 2004, and the Errata to the DEIR which we received on February 24, 2005. The Errata included a notice of extension of review of the DEIR, establishing the end of the public review period as April 14, 2005. We also attended the City of San Diego's (City) December 9, 2003, pre-application meeting on the proposed project, and commented on the Notice of Preparation (NOP) of the DEIR in a letter dated April 15, 2004. We appreciate the opportunity to comment on the DEIR. Based on the information provided herein, the Wildlife Agencies strongly recommend that the City eliminate the Regents Road Bridge from further consideration as a viable alternative to address the traffic congestion in the UC North/South Transportation corridor. Accordingly, the City should process an amendment to the University Community Plan to remove this bridge from the Plan's Transportation Element.

The Department is a Trustee Agency and a Responsible Agency pursuant to the California Environmental Quality Act, Sections 15386 and 15381, respectively. The Department is responsible for the conservation, protection, and management of the state's biological resources, including rare, threatened, and endangered plant and animal species, pursuant to the California Endangered Species Act and other sections of the Fish and Game Code. The Department also administers the Natural Community Conservation Planning program. The primary concern and mandate of the Service is the protection of public fish and wildlife resources and their habitats. The Service has legal responsibility for the welfare of migratory birds, anadromous fish, and endangered animals and plants occurring in the United States. The Service is also responsible for administering the Endangered Species Act of 1973, as amended (16 U.S.C. 1531 et seq.).



PROJECT OVERVIEW

Project Description

The Transportation Study evaluates several transportation alternatives intended to relieve traffic congestion, in particular, within and between the southern and northern portions of the community of University City in the City. The purpose of the DEIR is to provide an analysis of seven of the alternatives and any impacts that may result from their implementation to allow the decision-maker (i.e., the City Council) to select an alternative for implementation. The DEIR does not recommend one alternative over another, and indicates that, due to the general nature of the DEIR, additional environmental review may be required, and additional mitigation measures with a higher degree of specificity could be required in conjunction with discretionary permits (e.g., Streambed Alteration Agreement from the Department).

Alternatives

The seven alternatives described and analyzed in the DEIR are the following:

1. Genesee Avenue Widening (GAWA), which would expand this roadway from four to six lanes between State Route (SR) 52 and Nobel Drive, and would take roughly two years to complete;
2. Regents Road Bridge (RRBA), which would extend across Rose Canyon to connect the existing termini of that street at the north and south rims of the canyon, and would take one year to complete;¹
3. Genesee Avenue/Governor Drive Grade Separation, which would reconstruct the present intersection of these two streets to create an underpass beneath Governor Drive to accommodate through-traffic on Genesee Avenue;
4. Combination of the Regents Road Bridge and the Genesee Avenue Widening (no Grade Separation);
5. Combination of the Regents Road Bridge and the Genesee Avenue/Governor Drive Grade Separation (no Genesee Avenue Widening);
6. Limited Roadway Changes (LRCA), which would construct an additional eastbound left-turn lane along the south-bound Genesee Avenue and Regents Road at their respective interchanges with SR52; and

¹ The RRBA would be over 1500 feet long, with the portion of the road on fill being 700 feet long and the span being 870 feet long. The maximum height of the bridge above the canyon floor would be 60 feet and the total width of the decks, including the 10-foot wide span between them, would be approximately 94 feet. The fill would be in a tributary canyon to Rose Creek and the coastal sage scrub on one of the slopes of this canyon supports one of the pairs of the California gnatcatchers that would be affected.

- 7. No Project, which would include none of the previous alternatives, but assumes the implementation of the: (a) roadway changes in the University City Facilities Benefit Assessment plan; (b) San Diego Association of Government’s revenue constrained 2030 Regional Transportation Plan improvements; (c) improvements to the La Jolla Village Drive / Interstate 805 interchange; (d) widening of Genesee Avenue from Regents Road to Interstate -5; and, (e) improvements to the Genesee Avenue / Interstate 5 interchange.

Alternatives 1 through 5 would include the project elements associated with the LRCA (i.e., alternative 6), and alternatives 1 through 6 are the action alternatives, as opposed to the No Project (i.e., no action) alternative.

Biological Impacts

Based on the DEIR and its associated biological resources report (Merkel & Associates, Inc. September 29, 2004, #02-099-01, Appendix C to the DEIR), biological impacts would occur with the implementation of the GAWA, the RRBA, and the combined GAWA/RRBA, all three of which include the roadway changes in the LRCA.

Portions of the study area are within the Multiple Habitat Planning Area (MHPA) of the City’s Multiple Species Conservation Program (MSCP) Subarea Plan. Specifically, these are Rose Canyon (Rose Canyon Open Space Park) and San Clemente Canyon (Marian Bear Memorial Natural Park), both of which would be affected by the RRBA and the GAWA.

The following table provides total proposed losses of habitats associated with the GAWA, RRBA, with the sensitive upland habitats broken out (i.e., in parentheses). The sensitive upland habitats that would be affected include Diegan coastal sage scrub, coast live oak woodland, native grassland, and non-native grassland. The wetland habitats that would be affected include southern cottonwood willow riparian forest, southern willow scrub, unvegetated waters of the U.S./streambed, coastal and valley freshwater marsh, and wet meadow.

Summary of Proposed Losses of Habitats in Acres¹						
	Wetlands^{2,4}		Uplands Within MHPA^{2,3}		Uplands Outside MHPA²	
	P	T	P	T	P	T
Genesee Avenue Widening	0.49	1.76	0.01 (0.003)	0.04 (0.04)	27.52 (1.39)	4.63 (3.58)
Regents Road Bridge	0.49 ⁵	1.40	1.89 (1.47)	6.4 (5.77)	4.82 (0.74)	2.29 (0.59)

1 Please see comment 2 on page 7 regarding impacts.
 2 P = permanent impacts; T= temporary impacts
 3 Numbers outside parentheses represent all habitats including sensitive habitats; numbers in parentheses represent only sensitive habitats.
 4 1.15 acres of the wetland impacts are associated with the LRCA, specifically the SR52/Genesee Avenue interchange.
 5 0.09 acre of this is southern willow scrub within a site of restoration conducted by the City with a 1997 Habitat Conservation Fund grant from the California Department of Parks and Recreation.

The DEIR identifies the sensitive species that would be directly (i.e., loss of habitat) and indirectly negatively affected by the action alternatives. The following table lists those species for the GAWA and the RRBA.

Subset of Species Observed Within the GAWA and RRBA Area of Potential Effect	
Genesee Avenue Widening Alternative	Regents Road Bridge Alternative
<p><u>would be directly affected</u></p> <ul style="list-style-type: none"> ➤ yellow warbler ➤ clay field goldenbush, CNPS List 1B <p><u>may be indirectly affected</u></p> <p>same species as listed under direct effects</p>	<p><u>would be directly affected</u></p> <ul style="list-style-type: none"> ➤ California gnatcatcher, possibly two pairs ➤ yellow-breasted chat ➤ California thrasher ➤ white-tailed kite ➤ clay field goldenbush, CNPS List 1B <p><u>may be indirectly affected</u></p> <p>same species as listed under direct effects, plus</p> <ul style="list-style-type: none"> ➤ bobcat ➤ coyote ➤ mule deer ➤ mountain lion ➤ Cooper's hawk ➤ red-shouldered hawk ➤ red-tailed hawk ➤ great horned owl ➤ barn owl ➤ yellow warbler, etc

Biological Mitigation

Among the City's proposed mitigation measures for impacts on biological resources are the following.

1. Mitigation for loss of habitat would occur at ratios consistent with the City's Biology Guidelines. Specific quantities of habitat creation, restoration, and preservation would depend on final engineering design.
2. The City would prepare a Wetland Mitigation Plan which would identify the exact amount and location of the impacted wetland habitat and identify the appropriate location for the wetland mitigation.
3. Engineering design would include measures to implement the City's MSCP Land Use Adjacency Guidelines.
4. Measures to avoid impacts during the avian breeding season, such as avoidance of removal of occupied habitat and controlling construction noise levels, would be implemented.
5. Measures to avoid impacts on nesting raptors would be implemented.
6. A survey for willoway monardella would be conducted prior to construction.

Traffic

The traffic study conducted for the DEIR modeled existing and future (year 2030) traffic conditions to determine the levels of service (LOS) of the Transportation Study's target road segments and intersections. Currently, two road segments within the study area operate at unacceptable LOS (i.e., LOS E or F). Both are on Miramar Road east of I-805, and are outside the study corridors (i.e., Regents Road and Genesee Avenue corridors). Currently, eight intersections within the study area operate at unacceptable levels. Five of these are outside of the study corridors. The following table provides the LOS of the no-project alternative, the LRCA alone, the GAWA alone, the RRBA alone, and a combination of the GAWA and RRBA, based on the modeling of the projected traffic in the year 2030.

Projected Unacceptable LOS for Year 2030		
	Road Segments	Intersections
No-Project	11	10
LRCA	11	10
GAWA	7	9
RRBA	9	9
GAWA & RRBA	7	7

As the table reflects, in 2030 the (a) no project alternative would result in having eleven road segments and ten intersections operating at unacceptable LOS, (b) LRCA along would result in having eleven road segments and ten intersections operating at unacceptable LOS, (c) GAWA alone would result in having seven road segments and nine intersections operating at unacceptable LOS, (d) RRBA alone would result in having nine road segments (seven of them the same as for the GAWA) and nine intersections (eight of them the same as the GAWA) operating at unacceptable LOS, and (e) combination of the GAWA and the RRBA would result in having seven road segments (same as for the GAWA) and seven intersections operating at unacceptable LOS.

WILDLIFE AGENCIES' COMMENTS

The comments provided herein are based on the information provided in the DEIR, the Wildlife Agencies' knowledge of sensitive and declining vegetation communities and species in the City, and our participation in regional conservation planning efforts. As the alternatives whose implementation would result in biological impacts are limited to the GAWA and the RRBA, both of which include the roadway changes in the LRCA, we restrict our comments to these alternatives.²

It is evident from the information provided in the project overview that, of the two action alternatives described, the GAWA would have substantially fewer and less significant biological impacts than the RRBA. The biological resources report states, the RRBA "would result in the

² We do not directly address the alternative that combines the GAWA and the RRBA. It is understood that the biological impacts associated with both alternatives would occur if the combination is implemented.

highest impacts to biological resources, and ultimately would result in the bulk of the mitigation requirements.” Of these two alternatives, the GAWA is also the alternative that would most effectively meet the project purpose.

If the City selects the RRBA or the GAWA for further consideration, additional environmental documentation should be prepared, and particularly for the RRBA, the Wildlife Agencies request that City coordinate with us regarding measures to avoid and minimize the biological impacts on the MHPA, the federally listed threatened California gnatcatcher (*Polioptila californica californica*) and other MSCP covered species, wetlands, and other sensitive habitats and species. At that time, we will discuss avoidance and minimization measures and measures necessary to adequately mitigate for the direct and indirect impacts of the RRBA or the GAWA. Therefore, we provide only limited recommendations in the letter about avoidance, minimization, or mitigation measures additional to those described in the DEIR. Our primary intent now is to discuss biological impacts which the DEIR either inappropriately dismissed as not significant or disregarded.

While the ensuing comments address the biological impacts associated primarily with the RRBA, we request that this not be construed as supportive of the implementation of the GAWA or any other alternative. The GAWA alternative would result in significant losses of wetlands, largely attributable to the construction associated with the LRCA (also common to the RRBA), and would also affect wildlife movement.

Direct Impacts

1. We recognize that the MSCP Subarea Plan allows for the placement of roads within the MHPA if they are identified in a community plan, as is the case for the Regents Road Bridge in the University Community Plan. Such roads must conform to the General Planning Policies and Design Guidelines in the Subarea Plan. Two of these Policies are that: (a) construction and maintenance activities in wildlife corridors must avoid significant disruption of corridor usage; and, (b) development in canyon bottoms should be avoided when feasible, and bridges are the preferred method for providing for wildlife movement.

The fundamental premise of the General Planning Policies and Design Guidelines is to avoid unnecessary substantial biological impacts within the MHPA. While they encourage the use of bridges instead of roads that traverse canyon floors, clearly, if there is one or more biologically preferable alternative that would meet or surpass the needs of a project for which a bridge is considered, that alternative would be the appropriate one to pursue relative to preserving the biological integrity of the MHPA. Such an alternative to the RRBA is the GAWA. Nevertheless, the DEIR is silent on the second Policy identified above despite the substantial potential direct and indirect negative biological impacts associated with the RRBA (see subsequent additional comments).

We disagree with the conclusion in the DEIR that the RRBA would be consistent with the first Policy. The RRBA would negatively affect a wildlife corridor and an extensive riparian woodland system, particularly during construction. Medium-to-large sized mammals

including coyote, bobcat, mule deer, and possibly mountain lion, currently utilize Rose Canyon. The magnitude and the duration of the staging, access, and construction activities would result in significant disruption of corridor usage by wildlife. For example, the entire wildlife corridor through Rose Canyon would be obstructed during the construction of the bridge (at least one year). The resulting disruption of wildlife movement would be a significant and unmitigable impact (biological resources report, page 77). However, this would be avoided if the RRBA were not built. The 8.29 acres of upland impacts on the MHPA would also be avoided. By comparison, the GAWA would affect an estimated 0.05 acre of upland habitat within the MHPA and not result in unmitigable significant impacts to a wildlife corridor.

2. We are concerned that the City Council will not have the correct information regarding the habitat losses associated with each action alternative. There are many discrepancies among the acreages of impacts in the tables in the DEIR and the biological resources report. We realize that the quantities of habitat losses could change with further engineering design. However, for the City Council to make an informed decision about which action alternative, if any, to consider further, they need to know the impacts determined to date.

Our understanding is that the GAWA and RRBA would include all the components of the LRCA (i.e., not that the GAWA would include only the LRCs at the SR52/Genesee Avenue interchange, and not that the RWBA would include only the LRCs at the SR52/Regents Road interchange) (page 3-36 of the DEIR). It appears that many of the acreage discrepancies derive from inconsistencies in how the impacts from the LRCA were accounted for in the GAWA and RRBA. It seems that in most, if not all, of the tables of habitat losses for the GAWA and RRBA, only some or none of the losses from the LRCA have been accounted for. For example, our interpretation of the approach used in the biological resources report to tally the impacts (page 3 of the report, under alternative 7) is that the impact acreages for the GAWA include the impacts from only the SR52/Genesee Avenue components of the LRCA, and the impact acreages for the RRBA include no impacts from the LRCA.

Just one example of the confusion about the proposed losses of habitat follows. Table 4.3-5 indicates that the combined temporary and permanent wetland impacts from the LRCA would be 1.23 acres. Therefore, since all the action alternatives would include all the components of the LRCA, the proposed wetland impacts for the GAWA and the RRBA should be at least 1.23 acres. While Table 4.3-7 indicates that the wetland impacts for the GAWA would be 2.27 (Department impacts), Table 4.3-9 indicates that the wetland impacts for the RRBA would be 1.33. Given that the wetland impacts from the construction of only the Regents Road Bridge would be 0.74 acre (Table 13 in the biological resources report), the impact of the RRBA would be at least the sum of 0.74 acre and 1.23 acres for a minimum total of 1.97 acres. Thus the value of 1.33 in Table 4.3-9 for impacts to wetlands from RRBA is incorrect.

The values in the table of habitat losses on page 3 of this letter are based on our efforts to reconcile the discrepancies in the DEIR and the biological resources report. Please note that 1.15 acres of the wetlands losses are attributable solely to the SR52/Genesee Avenue interchange component of the LRCA which is common to both the GAWA and the RRBA

(Table 4.3-5). We request that this matter of the acreages of habitat losses be resolved and the revised data be provided to the City Council before they consider the alternatives, so that they can have the information needed to make an informed decision. The final EIR should reconcile the discrepancies, and adjust the mitigation requirements as necessary, acknowledging that the mitigation for wetlands would ultimately be determined by the resource agencies in whose jurisdiction the wetland impacts occur.

3. The DEIR mentions the hydraulic constraint posed by the Genesee Avenue bridge over Rose Creek. Downstream of Genesee Avenue, the 100 year floodplain is approximately 70 feet wide, compared to 300 feet wide several hundred feet upstream. Under Genesee Avenue, Rose Creek is confined to box culverts subject to sediment accretion.³ The biological resources report indicates that wildlife passage in this area of Rose Canyon is also restricted under the bridge to an approximately 30-foot wide area north of and adjacent to the railroad tracks for a length of 94 feet (i.e., width of the bridge). The biological resources report and DEIR indicate that the GAWA would widen Genesee Avenue from 92 to 102 feet over the railroad tracks in Rose Canyon, and conclude that impacts resulting from the widening would be only incremental and would not add any new permanent significant impact. Given the already constrained space for wildlife movement in this area and the importance of maintaining adequate connections within open space areas and preserves to preserve biological diversity and population viability, we disagree with the conclusion that the incremental impacts would not be significant.

The current condition at the Genesee Avenue bridge over Rose Creek provides, at best, a tenuous, wildlife movement linkage between the west and east side of Genesee Avenue. It is a critical pinch point in the wildlife movement corridor extending through Rose Canyon between Interstate-5 and Genesee Avenue and on to the open space areas on the Marine Corps Air Station (MCAS) to the east. In turn, these areas on the MCAS provide wildlife movement corridors through to Mission Trails Regional Park, Sycamore Canyon County Park, Marian Bear Regional Park, and Los Penasquitos Canyon Preserve.

If the City selects the GAWA for further consideration, we recommend that the alternative be designed to replace the existing culverts with a design that is more conducive to wildlife passage and to reducing the hydraulic constraint. The MSCP Subarea Plan states, "If roads cross the MHPA, they should provide fully-functional wildlife movement capability." Implementation of the GAWA would be an ideal opportunity to greatly improve the wildlife movement linkage at this pinch point. In our NOP letter, we asked that the EIR describe how the box culverts under Genesee Avenue (now at least 94 feet long and proposed to be at least 104 feet long), would be improved for wildlife movement, and that the discussion of measures to improve the undercrossing include measures to attenuate noise from traffic. The DEIR addresses neither. Regardless of whether the City selects the GAWA to consider

³ A site visit on March 31, 2004, revealed that, though the box culverts are at least 6 feet high, at that time they had water in them except where sediment had collected. In some areas of sediment accretion, the sediment was so high as to dissuade or prevent wildlife (even small to medium-sized mammals) from passing through.

further, the culverts should be cleaned out on a regular basis so that they can provide optimal biological and hydraulic functions.

4. The DEIR indicates that project construction is expected to occur outside of the avian breeding season, thereby avoiding impacts on breeding behavior. The DEIR also indicates that the GAWA and the RRBA would take two years and one year, respectively, to construct. The final EIR should elaborate on the project duration. For example, please explain whether the one-year project construction period would actually be approximately 18 to 20 months to accommodate avoidance of avian breeding season (e.g., for raptors, February 1 through August 30). If the durations of project construction would be extended, consideration must be given to the increased duration of construction-related biological impacts such as impairment of wildlife movement through Rose Canyon in the area of the Regents Road bridge.
5. The RRBA would affect 0.09 acre of southern willow scrub within a site of restoration conducted by the City with funding from the California Department of Parks and Recreation (DPR) Habitat Conservation Fund Program (HCFP). This area is also within the MHPA. The DPR's procedural guide for the HCFP (May 1997), states, "applicant will maintain and operate the property acquired, developed, rehabilitated, or restored with the funds in perpetuity..... [and] make no other use, sale, or other disposition of the property except as authorized by specific act of the Legislature." In our NOP letter, we stated, "if the City committed to preserving the restoration in perpetuity, and the Regents Road Bridge alternative could not be designed to avoid (including shading and indirect impacts) the restoration area, the DEIR should explain why the [RRBA] is among the alternatives being studied." The DEIR does not respond to this query, and though it briefly describes the purpose of the restoration, it provides no justification for or evidence of being relieved from meeting DPR's requirements. We request that the City now respond to our query.
6. Considering that neither the types nor locations of the construction and post-construction best management practices (BMPs) have been determined, the losses of habitat are not entirely accounted for in the DEIR. We appreciate the general nature of this DEIR. However, it is unclear how the City Council will be fully informed to make a decision-about which alternative, if any, to consider further without knowing the habitat loss impacts. BMPs can occupy, and result in loss or degradation of habitat in, considerably large areas. Such potential losses are unaccounted for in the DEIR, as are also the potential impacts from the on-going long-term BMP maintenance which can be a source of disturbance (i.e., indirect effects) to sensitive wildlife species.

Edge Effects / Indirect Impacts

Generally, the DEIR does not adequately analyze the potential biological impacts from edge effects resulting from the RRBA. This alternative would introduce or exacerbate several potential indirect / edge effects into Rose Canyon where they either don't now exist or exist to a lesser degree than they would with the bridge. Edge effects are defined as undesirable anthropogenic disturbances beyond urban boundaries into potential reserve habitat (Kelly and

Rotenberry 1993). Edge effects, such as disturbance by humans, noise, and lighting, and decreases in avian productivity (Andren and Angelstam 1988), line-of sight disturbances, air- and water-borne contaminants associated with vehicles (air pollution can degrade vegetation), and fugitive dust during both construction and operation, are all documented effects that have negative impacts on sensitive biological resources in southern California. Edge effects can penetrate up to 200 meters from the actual reserve boundary (CBI 2000).

In part because the DEIR does not provide sufficient specific information about the RRBA, we are unable to demonstrate unequivocally that the edge effects we discuss below would, singly or in conjunction with each other, have significant impacts on sensitive wildlife species and the MHPA. However, considering the information in the following comments, we believe that there is ample reason for concern regarding the bridge's long-term biological impacts, and consider it likely that the edge effects of the RRBA would significantly compromise the biological integrity of Rose Canyon and the MHPA within it, and would significantly negatively affect the sensitive wildlife species that reside in or migrate through it. We must consider these impacts because we are responsible for the biological welfare of all species listed under the Migratory Bird Treaty Act, and other species of concern, including the MSCP-covered species, and partially responsible to protect the biological integrity of the MHPA. We recommend that the final EIR thoroughly address the ensuing issues we raise.

Noise

The DEIR states the following regarding the potential biological impacts from noise and lights.

Permanent, indirect impacts in the long-term, taking the form of noise and light (headlights at night), from the widened Genesee Avenue bridge would be additive to the current roadway use impacts, they would be incremental and would not be considered significant for the widening project (page 4.3-44).

Permanent, indirect impacts in the long-term, taking the form of noise and light (headlights at night) on the new bridge from the widened Regents Road Bridge would not be significant (page 4.3-52).

We agree with the conclusion regarding the significance of the incremental impacts from noise and light that would result from the GAWA. However, we disagree with the statement about the significance of the potential biological impacts of lighting (see next comment) and noise resulting from the RRBA, and believe that the following statement in the biological resources report more accurately reflects the potential impacts.

...lighting and noise could potentially have an indirect but significant impact on the wildlife in residence and moving through the canyon in the vicinity of the bridge (page 63).

The DEIR indicates that the area where the Regents Road bridge would be built would experience an increase of approximately 12 decibels A-weighted [dB(A)],⁴ from a predicted future No Project level of 59.6 dB(A) to future noise level with the bridge of 71.8 dB(A), and that the 65 dB(A) CNEL⁵ contour may extend as far as 240 feet from the centerline of the bridge in the residential areas north and south of Rose Canyon. In a condition where the roadway and receiver are at grade and the ground is vegetated, the 65 dB(A) CNEL contour distance would be 140 feet from the centerline when there is no intervening obstruction.⁶ The current peak hourly noise level on the canyon floor in this area, south of the tracks, is 55-56 dB(A) Leq. Preliminary research suggests that noise levels in excess of 60dB(A) L_{eq}⁷ hourly can adversely affect avian species such as the coastal California gnatcatcher (Awbrey 1993) and least Bell's vireo [(*Vireo bellii pusillus*: vireo) (Regional Environmental Consultants and San Diego Association of Governments 1990).⁸ Notwithstanding that the dB(A) and CNEL units of measure, or the thresholds typically used for human sensitivity, may not be appropriate for application to all sensitive wildlife receptors, we are concerned about the potential long-term biological impacts primarily on avian species in the canyon from the traffic-generated noise emanating from the bridge. The noise levels in the canyon would be higher than the levels provided above for the residential areas. Birds that now use the forest canopy and other lower vegetation (as the bridge descends towards its northern and southern termini) within 240 feet (or greater, depending on the noise levels in the canyon) of the bridge may abandon these habitats as a result of the increase in noise levels, either alone or in conjunction with other bridge-related impacts (e.g., lights, line-of-sight disturbances), or minimally no longer use the habitat during the breeding season.

Avian hearing is critical for mate selection, territorial defense, and predator selection. Sound distortion may make it hard for prospective mates to determine the quality of others' songs. This may make females tend to choose mates from less noisy areas, affecting nesting patterns. Noise in excess of 60 dB(A) L_{eq} can mask the song of a male birds, thereby inhibiting his chance of attracting a mate. Reduced communication distance may make it harder to locate mates or make prospective mates perceive the calls of suitors as weaker than those of suitors in less noisy areas. It also reduces the area a bird can effectively defend, making the bird less attractive as a resource

⁴ A-weighting refers to an electronic filter applied to sound pressure level measurements. It discriminates against low frequencies so that the sound measurements correspond more closely to the response of human hearing to many types of noise.

⁵ Community noise equivalent level: Twenty-four-hour average A-weighted sound level for a given day, after addition of five decibels to sound levels between 1900 and 2200 hours, and ten decibels to sound levels between 0000 and 0700 hours and between 2200 and 2400 hours.

⁶ Elsewhere, the DEIR indicates that traffic noise levels on the canyon floor would not exceed 60 dB(A) Leq (page 5.3-52). However, no explanation as to how this is derived is provided.

⁷ Leq = equivalent noise level. The Leq is a hypothetical steady state noise level that in a stated period of time contains the same average A-weighted noise energy as a measured varying sound at the stated level.

⁸ We acknowledge that vireo were not detected during surveys conducted in the Rose Canyon study area. We include them here only for purposes of illustration.

provider. Noise can also mask the vocalizations of vireos signaling the presence of a predator (Regional Environmental Consultants and San Diego Association of Governments 1990). Furthermore, energetic costs from behaviors associated with noise may lead to a reduction in weight gain (Ward and Stehn 1989), which may decrease reproductive fitness. Noise may also result in immediate and long-term behavioral responses (e.g., flushing vs. permanent abandonment of an area), acute and/or chronic physiological responses (e.g., heart rate increase vs. increases in the release of adrenocorticotrophic hormone; fluctuating asymmetry, Palmer 1996), or demographic parameters (e.g., survival or reproduction).

The lowest sections of the bridge would be near the California gnatcatcher habitat which would be subject to considerable increases in operational (i.e., traffic) noise during the breeding season. We are concerned that, if the species persists in these territories throughout the construction period, the noise generated by traffic during the breeding season may cause gnatcatchers to abandon their territories, or may diminish breeding success. As these territories are within the MHPA, we would consider such loss unnecessary because other alternatives exist that avoid take of this species. Individuals of all the species listed in the table on page 3 might be similarly affected, including the Cooper's hawk, an MSCP-covered species, and the other raptorial species.

Lighting

The DEIR states the following regarding the potential biological impacts from lights.

Mitigation for alternatives that include the Regents Road Bridge require lights on the bridge to be shielded such that light would be directed away from the MHPA (page 4.3-53).

With the MHPA and sensitive habitats surrounding the Regents Road Bridge, it would be difficult, if not impossible, to orient the lights on the bridge in a manner that obstructs all light from reaching the wildlife that resides there. And, while the proposed barriers on both sides of the Regents Road Bridge would shield headlights from the canyon floor, as suggested in the DEIR, the glow cast from the headlights and the lights on the bridge would spill into the sensitive habitats. In an area that now experiences minimal urban lighting (sky glow) and no direct lighting, this would likely constitute a significant biological impact, as discussed below.

Illumination of riparian corridors by night lighting has the potential to adversely affect birds. Physiological, developmental, and behavioral effects of light intensity, wavelength, and photoperiod on bird species are well-documented. In the wild, urban lighting is associated with early daily initiation of avian song activity (Bergen and Abs 1997). Avian species are known to place their nests significantly farther from motorway lights than from unlighted controls (de Molenar et al, 2000). Placement of nests away from lighted areas implies that artificial light renders part of the home range less suitable for nesting. If potential nest sites are limited within the bird's home range, reduction in available sites associated with artificial night lighting may cause the bird to use a suboptimal nest site that is more vulnerable to predation, cowbird

parasitism,⁹ or extremes of weather. Artificial lighting generally threatens wildlife by disrupting biological rhythms and otherwise interfering with the behavior of nocturnal animals (contributions from Artificial Night Lighting Conference, 2002). Nocturnal and migrating birds, migrating bats, insects, fish, and amphibians are particularly affected by artificial night lighting (Evans Ogden 1996 and citations therein). Billions of moths and other insects are killed from lights each year. Nocturnal birds use the stars and moon for navigation during migrations. When these birds fly through a brightly lit area, they can become disoriented, which can lead to injury and/or death. In addition, artificial lighting can affect aquatic invertebrates that are prey for other animals. Other references that may provide useful insight into the analysis of indirect impacts include Longcore and Rich (2001) and the National Cooperative Highway Research Program (2002).

Other Indirect Impacts

Other potentially significant indirect biological impacts associated with RRBA about which we are concerned include avian collisions with vehicles on the bridge and hydrological modifications of Rose Creek and its floodplain during and after construction. We recommend that the final EIR fully evaluate and disclose these impacts.

Mitigation

Again, if the City selects the RRBA or GAWA for further consideration, the Wildlife Agencies request that City coordinate with us regarding measures to avoid and minimize the biological impacts on the MHPA, California gnatcatcher and other MSCP covered species, wetlands, and other sensitive habitats and species. At that time, we will discuss measures necessary to adequately mitigate for the direct and indirect impacts of the RRBA or GAWA. Our preliminary comments on the proposed mitigation follow.

1. We are concerned about the difficulty of finding adequate mitigation sites for the amount of wetland mitigation that would be needed for the GAWA and/or the RRBA. The DEIR provides no details about where the mitigation might occur. We agree with, and incorporate by reference, the Regional Water Quality Control Board's comments (February 28, 2005, letter on the DEIR) regarding the inappropriate deferral of identifying specific mitigation measures, as the comments apply to the omission of adequate specific information on mitigation sites for habitat losses.
2. If the proposed mitigation could cause biological impacts (e.g., removal of sensitive upland habitats for the creation of wetlands), additional CEQA analysis and review would be warranted [CEQA Guidelines, section 15126.4(a)(D)], and additional mitigation may be necessary. Again, it is unclear how the City Council will be fully informed to make a decision-about which alternative, if any, to select without this information.

⁹ Brown-headed cowbirds were observed in the proximity of the Regents Road Bridge.

3. The DEIR indicates that the mitigation for the temporary loss of wetlands would be at a ratio of 1:1. It is likely that the Department will require at least a 2:1 ratio for the temporary losses of wetlands, particularly considering the duration and nature of the temporary losses. For example, the construction access and staging areas for the RRBA would disrupt the functions and values of the mainstem of Rose Creek and its associated riparian habitat during the construction of the RRBA, which would last at least one year.
4. Depending on the duration of the temporary loss of coastal sage scrub and other sensitive upland habitats, particularly within the MHPA, it may be appropriate to mitigate at a ratio greater than 1:1 and to fulfill any off-site mitigation requirement prior to or during project-construction.
5. The final EIR should require and fully describe methods to attenuate project-related construction and operational noise levels in excess of ambient levels at the edge of sensitive habitats to avoid or minimize further degradation of habitat for wildlife, particularly avian species.
6. The proposed mitigation measure to protect raptors during the breeding season may be insufficient. In southern California, Cooper's hawks are known to lay their eggs as early as the end of January (Unitt 2004), which indicates that they start building their nests earlier. Therefore, since this species likely nests on site (page 22 of the biological resources report), the construction avoidance period should be adjusted to begin at the latest by January 1. In addition, the MSCP Subarea Plan requires that area specific management directives for the Cooper's hawk must include a 300-foot impact avoidance areas around active nests and minimization of disturbance in oak woodlands and oak riparian forests.¹⁰ These requirements apply to both construction and post-construction (i.e., once the bridge is being used) impacts.

Conclusion

Based on the preceding discussion, we strongly recommend that the City eliminate the RRBA from further consideration as a viable alternative to address the traffic congestion in the University City North / South Transportation corridor. Accordingly, the City should process an amendment to the University Community Plan to remove this bridge from the Plan's Transportation Element.

It remains for the City to determine whether the improvement in traffic congestion provided by any of action alternatives studied to date warrants the associated loss of sensitive biological resources and the fiscal expense, inclusive of the cost of biological mitigation. Assuming that the methodology used to model the 2030 traffic conditions is valid, it is evident from the modeling results provided in the DEIR that the GAWA would be the most effective action alternative to address traffic congestion in the study corridor. While the combination of the GAWA and the RRBA would provide two more intersections that operate at acceptable LOS

¹⁰ It is not clear from the DEIR where Cooper's hawks occur in Rose Canyon relative to the RRBA alignment.

than would the GAWA alone, the economic and biological impacts associated with the combination may render its implementation prohibitive.

We appreciate the opportunity to comment on the DEIR. The Department finds that the implementation of any of the action alternatives would not be de minimis in its effects on fish and wildlife per section 711.4 of the California Fish and Game Code. Please contact Carolyn Lieberman of the Service at (760) 431-9440, or Libby Lucas of the Department at (858) 467-4230, if you have any questions or comments concerning this letter.

Sincerely,

Therese O'Rourke
Assistant Field Supervisor
U.S. Fish and Wildlife Service

Donald Chadwick
Habitat Conservation Planning Supervisor
South Coast Region
California Department of Fish and Game

cc: Department of Fish and Game (Kelly Fisher)
Regional Water Quality Control Board (Stacey Baczkowski)
State Clearinghouse
U.S. Army Corps of Engineers (Terrence Dean)

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 San Diego, CA 92123
 (858) 467-4201
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U.S. Fish and Wildlife Service
 Carlsbad Fish and Wildlife Office
 6010 Hidden Valley Road
 Carlsbad, California 92011
 (760) 431-9440
 FAX (760) 431-5901



In Reply Refer to:
 FWS-SDG-3970.3

July 31, 2006

Ms. Martha Blake, Associate Planner
 City of San Diego
 Development Services Department
 1222 First Avenue, MS 501
 San Diego California 92101

Re: University City North/South Transportation Corridor Study

Dear Ms. Blake:

The U.S. Fish and Wildlife Service and the California Department of Fish and Game have reviewed the City's response to our comments (RTCs) on the draft Environmental Impact Report (EIR) for the University City North/South Transportation Corridor Study (Transportation Study). We understand that tomorrow the City Council will consider whether to certify the final EIR for the subject project and whether to select the Regents Road Bridge Alternative (RRBA) and initiate an amendment to remove the Genesee Avenue Widening Alternative (GAWA) from the University Community Plan. We find that the RTCs underscore our previous assessment that because of its inadequacy, the EIR should not be certified. The RTCs also reinforce our previous recommendation that the City eliminate the RRBA (i.e., not the GAWA) from further consideration as a viable alternative to address traffic congestion in the UC North/South Transportation corridor (April 14, 2005, comment letter on the draft EIR, copy attached). Accordingly, the City should instead process an amendment to the University Community Plan to remove the bridge from the University Community Plan.

The July 26, 2006, staff Report to City Council on the RRBA seriously minimizes the biological implications of this alternative. One of the inadequate aspects of the biological impact analysis of the alternatives in the EIR is the consideration of their effects on the Multiple Habitat Planning Area (MHPA) of the City's Multiple Species Conservation Program Subarea Plan (MSCP SAP). In addition, the EIR and the RTCs fail to acknowledge that, while new roads are allowed in the MHPA, the MSCP SAP pre-supposes the selection of alternatives that satisfy the project purpose and meet the intent of the MSCP. The fundamental premise of the MSCP's General Planning Policies and Design Guidelines (Policies and Guidelines) is to avoid unnecessary substantial biological impacts within the MHPA. While they encourage the use of bridges instead of roads that traverse canyon floors, the Policies and Guidelines also require that if there is one or more biologically preferable alternative that would meet or surpass the needs of a project for which a bridge is considered, that alternative should be chosen to preserve the biological integrity of the MHPA. Such an alternative to the RRBA is the GAWA. Unfortunately, the DEIR is silent on this matter.

It is evident that the GAWA would have substantially fewer and less significant biological impacts than the RRBA, beyond those associated strictly with the MHPA. And, of these two

Ms. Martha Blake (FWS-SDG-3970.3)

alternatives, the results (see table below) of the City's traffic analysis indicate that the GAWA is also the alternative that would singly best meet the project purpose, if the purpose is to relieve traffic congestion, in particular, within and between the southern and northern portions of the community of University City.^{1,2} If however, the project purpose is different from that presented in the EIR, the City should formally revise it. It is important to note that the City is not obligated to select any alternative (RTC #2.29). Any improvement in traffic gained from any of the alternatives would be so marginal that it begs the question whether any would sufficiently meet the project purpose to warrant the associated expenditure of funds for its implementation.

Projected Unacceptable Levels of Service for Year 2030	
Road Segments	Intersections
No-Project	11
GAWA	7
RRBA	9
GAWA & RRBA	7

The July 26 staff Report to City Council states that the primary goal of the approach taken in the EIR "was to allow decision-makers to select an alternative based on a comparison of environmental consequences combined with social and economic factors associated with each alternative." However, the City's finding (Candidate Findings, page 41) that the GAWA is infeasible undermines the credibility of this approach and represents a contravention of CEQA which requires that alternatives be feasible (CEQA Guidelines Section 15126.6).

The City has prepared a statement of overriding considerations, though its propriety is questionable given the inadequacy of the EIR. However, there is no such relief mechanism available to the City for its obligations under the MSCP, and it is not apparent to us how the City will make the MSCP findings required to proceed with the RRBA.

In conclusion, if the City decides to implement any of the alternatives in the EIR, to be consistent with the City's MSCP SAP, it should be the GAWA. We appreciate the opportunity to comment on the subject project and the City Council's related pending considerations. Please contact Libby Lucas of the Department at (858) 467-4230 or Carolyn Lieberman of the Service at (760) 431-9440 if you have any questions or comments concerning this letter.

Sincerely,

Michael J. Mulligan
 Michael J. Mulligan
 Deputy Regional Manager
 California Department of Fish and Game

Therese O'Rourke
 Therese O'Rourke
 Assistant Field Supervisor
 U.S. Fish and Wildlife Service

1 This statement of project purpose is based on the EIR and the purpose as described to us when we met with the City on December 9, 2003.
 2 Our comment is not intended to be interpreted as confirmation that there is a need for traffic meter, and assumes that the methodology used to model the 2030 traffic conditions is valid. As we did not review the final EIR, we are not certain that these numbers have remained the same as in the draft EIR. However, the City's response to our comments did not indicate that this summary is incorrect. The same portion of the July 26, 2008, staff Report to City Council omits the results of the study, though the Candidate Findings briefly assess them (page 41).

6076 Charae Street
San Diego, CA 92122
January 2, 2016

Susan Morrison, Environmental Planner
City of San Diego Planning Department
1010 Second Avenue, MS 614C
San Diego, CA 92101

Re: EIR Scoping Document; No. 12002051/11003327
and University Community Plan Amendment

Dear Ms. Morrison:

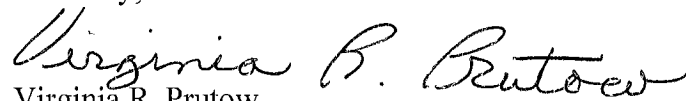
The changing demographics of south University City must be considered both in the analysis of the data from the current traffic study and in the formulation of projections for the future. In this community there are currently many senior citizens like myself living alone or with a spouse in single family residences, some with four or five bedrooms. Many moved into their current home thirty or more years ago with young children who are now grown.

It seems safe to assume that seniors generally drive fewer miles than younger people and that they have the flexibility and wisdom to avoid the hours when traffic is heaviest. It also seems safe to assume that in the near future there will be more younger people living in the single family residences now occupied by seniors. They will drive more and also have more time-specific commitments making it difficult for them to avoid traffic congestion.

Who will these new people be? South University City has traditionally been a family-oriented community. However, there are currently a substantial number of mini dorms in the community and there could be more. It also seems safe to assume that many of the new people will travel frequently to north University City.

The changing demographics of south University City must be an integral part of the EIR project.

Sincerely,


Virginia R. Prutow

From: [Hi](#)
To: [PLN PlanningCEQA](#)
Subject: UNIVERSITY COMMUNITY PLAN AMENDMENT Schedule No.: Pending (Internal Order 12002051/11003327)
Date: Monday, December 07, 2015 7:16:57 AM

To: Susan Morrison
Environmental Planner
City of San Diego Planning Department
From: Mr. & Mrs. William H. Beck
9005 Montrose Way
San Diego, CA 92122
Re: **The Timing of the NOP and Scoping Meeting**
University Community Plan Amendment
Schedule No.: Pending (Internal Order 12002051/11003327)
Date: December 7, 2015

Dear Ms. Morrison:

We are writing to you to express our objections to the timing of the comment period and also the date of the Scoping Meeting regarding the University Community Plan Amendment.

For most people this is the busiest time of the year. Most organizations including the Planning Group, Community Association and the City Council have limited or no meetings scheduled in December because of the season and all the activities people are involved with. We therefore respectfully request that you extend the comment period another 30 days beyond January 1st and reschedule the Scoping Meeting to give all those who want to comment and attend the meeting the opportunity to prepare to do so.

Thank you,

Mr. & Mrs. William H. Beck

From: oceanbill@san.rr.com
To: [Morrison, Susan](#)
Subject: NOP & Scoping Meeting Notice - University Community Plan Amendment
Date: Saturday, December 05, 2015 9:28:51 AM

Ms Morrison

I have a question about the traffic study. From my understanding of the notes of a recent UCPG meeting a traffic study had already been completed. Are the results of that study available? Thank you. William Mitchell. (858) 587-8175.