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# Appendix A

## NOP and Scoping Comments



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Notice of Preparation of an Initial Study and  
Draft Environmental Impact Report

**Fenton Parkway Bridge Project**

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**MAY 2023**

*Prepared for:*

**THE BOARD OF TRUSTEES OF THE  
CALIFORNIA STATE UNIVERSITY**

401 Golden Shore  
Long Beach, California 90802

*Prepared by:*

**SAN DIEGO STATE UNIVERSITY  
FACILITIES PLANNING, DESIGN,  
AND CONSTRUCTION**

5500 Campanile Drive  
San Diego, California 92182-1624



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# Notice of Preparation of an Initial Study and Draft Environmental Impact Report

## Notice of Public Information and Scoping Meetings

**To:** State of California  
Office of Planning and Research  
State Clearinghouse  
1400 Tenth Street  
Sacramento, California 95814

**From:** Paul Jackson, Program Manager  
Facilities Planning, Design, and Construction  
Business and Financial Affairs  
San Diego State University  
5500 Campanile Drive  
San Diego, California 92182-1624

The Board of Trustees of the California State University (CSU), which is the State of California acting in its higher education capacity, will be the lead agency for the preparation of an environmental impact report (EIR) in accordance with the California Environmental Quality Act (CEQA; Public Resources Code, Section 21000 et seq.) and Title 14 of the California Code of Regulations, Section 15000 et seq. (hereafter “CEQA Guidelines”). SDSU, an entity of the CSU, has prepared this Notice of Preparation (NOP) in accordance with CEQA Guidelines Sections 15082(a) and 15375. The EIR will address the environmental effects of the proposed Fenton Parkway Bridge Project (project) to connect Fenton Parkway with Camino Del Rio North in the City of San Diego (City). The Fenton Parkway Bridge (bridge) would span the San Diego River (river), which bisects the project site from east to west, to facilitate an additional vehicular, bicycle, and pedestrian connection between the businesses and residential areas north and south of the river. The proposed bridge (project site) is situated south of Fenton Parkway and the Fenton Marketplace and north of Camino Del Rio North in the Mission Valley community of the City (see **Figure 1**, Project Vicinity and Location). A portion of the project site traverses and lies adjacent to the City’s Stadium Wetland Mitigation Site and the City’s Multi-Habitat Planning Area (MHPA). The project will be constructed on real property owned by the City, and upon the completion of construction, the City will own, operate, and maintain the proposed bridge.

The project is referenced in the Mission Valley Community Plan and is a long-sought infrastructure enhancement in the Mission Valley community as a means of connecting residents and businesses south of the river to land uses north of the river off Friars Road, including the SDSU Mission Valley development, which was approved by the Board of Trustees of CSU in 2020. As part of the purchase and sale agreement between the CSU and the City for the SDSU Mission Valley site, which was executed in August 2020, the CSU agreed to help fund the planning, design, and construction of the bridge.

Pursuant to a Memorandum of Understanding (MOU) between the CSU and the City, as well as City Ordinance No. O-21564, SDSU has agreed to plan, design, and construct the bridge to City transportation department design standards on behalf of the City. As described in the MOU, the CSU and the City have agreed to work collaboratively on the bridge project; the CSU (SDSU) is responsible for planning, design, environmental review and permitting, and construction of the bridge, with City input. Additionally, the CSU and the City will share the costs of the project. Once constructed, the City will assume operation and maintenance obligations for the bridge. As outlined in the MOU, the CSU (SDSU) is preparing the EIR and the Board of Trustees of the CSU will serve as the lead agency under CEQA.

The project would involve construction of an approximate 450-foot-long bridge spanning the river from north to south to connect the southern terminus of Fenton Parkway to the northern terminus of Camino Del Rio North/Mission City Parkway (see **Figure 2**, Project Site). The proposed design for the bridge is a conventional post-tensioned, trapezoidal, concrete box girder structure. The bridge would be approximately 58 feet wide and 7 feet, 6 inches deep and would consist of up to four spans. The spans would be supported on concrete seat-type abutments in the river embankments at each end and two to three piers within the river channel, each consisting of two to three approximately 20-foot-tall, 6-foot-diameter circular concrete columns. The bridge would include two 11-foot-wide through-traffic lanes and a 10-foot-wide center lane that would be used for southbound left-turn movements onto Camino Del Rio North. The 10-foot center lane would provide an optional additional traffic lane for flexible use during stadium or emergency events. Combined bicycle and pedestrian pathways would be installed and raised above the travel lanes on either side of the bridge. The 6'-6" wide bike lane would be separated from a 5'-6" wide pedestrian path by a 6-inch-wide strip of yellow truncated domes (see **Figure 3**, Project Site Plan).

Existing storm drain infrastructure in the project area, including a 96-inch reinforced concrete pipe storm drain and a 54-inch storm drain, would require relocation and/or extension during project construction to accommodate proposed bridge structure abutments.

The Fenton Parkway/River Park Road intersection, which is currently under construction, would be expanded to a three-legged configuration with the new bridge approach forming the south leg of the intersection. The intersection would be signalized and include pedestrian crossing features such as high-visibility crosswalks, pedestrian-initiated interval phasing, and crosswalk countdown meters. The existing striped bike lanes on Fenton Parkway north of the trolley tracks would be extended to River Park Road; these lanes would lead to ramps connecting the elevated bike lanes on the new bridge. Additionally, a three-way signal would be installed at the Fenton Parkway/River Park Road intersection.

SDSU is seeking public and agency input regarding the scope and content of the environmental information to be included in the Draft EIR. Any responsible or trustee agency may need to use the EIR when considering permits or other project approvals. The failure to respond to this notice, or otherwise object to the conclusions made in the accompanying initial study, may prevent later assertions that issues excluded by the initial study should have been included in the Draft EIR.

Consistent with CEQA Guidelines Section 15082(b), all responses must be sent at the earliest possible date, but not later than 30 days after receipt of this notice. **All written comments received on or before 5 p.m. PST June 20, 2023, will be considered.** Please send written comments to [pjackson@sdsu.edu](mailto:pjackson@sdsu.edu) and include the name of the contact person for commenting parties or agencies. Written responses may also be sent via mail to:

Paul Jackson, Program Manager  
San Diego State University  
Facilities Planning, Design, and Construction  
5500 Campanile Drive  
San Diego, California 92182-1624

**Project Title:** Fenton Parkway Bridge Project

**Lead Agency:** The Board of Trustees of The California State University

**NOP Scoping Period:** May 22, 2023 – June 20, 2023

**Location:** The project site is located in the northeast portion of the Mission Valley Community, in the central portion of the metropolitan area of the City of San Diego. The project site is situated south of Fenton Parkway and the Fenton Marketplace and north of Camino Del Rio North and would connect these two roadways. The river bisects the project site from east to west. (see **Figure 1**).

**List of Probable Environmental Effects:** A more detailed description of the proposed project, the project location, and the potential environmental effects associated with development of the proposed project are provided in the initial study. A copy of this NOP and the initial study are available for review on the SDSU website at <https://bfa.sdsu.edu/campus/facilities/planning/eir>. As described in the initial study, the proposed project potentially could affect the following resources, which will be addressed in the Draft EIR: Aesthetics, Air Quality, Biological Resources, Cultural Resources, Energy, Geology and Soils, Greenhouse Gas Emissions, Hazards and Hazardous Materials, Hydrology and Water Quality, Land Use and Planning, Noise, Transportation, Tribal Cultural Resources, Utilities and Service Systems, and Wildfire.

### Requested Project Approvals

The following approvals by the CSU Board of Trustees are required prior to implementation of the proposed project:

1. Certification of adequacy and completeness of the CEQA document.
2. Approval of the proposed project.
3. Other approvals as necessary.

Development of the proposed project may require permits and/or approvals issued by public agencies other than the CSU Board of Trustees. The following is a non-exclusive list of other project permits or approvals that may be required by other agencies:

1. Consistency with the Multiple Species Conservation Plan (Findings prepared by the City of San Diego regarding the proposed project)
2. Approval of various easements, including vacations, replacements, etc. (issued by the City of San Diego consistent with the terms of the MOU)
3. Permits to construct within the City's rights-of-way (issued by the City of San Diego Transportation Department, consistent with the terms of the MOU)
4. Temporary access/right of entry permits for work on City-owned land within the river and for the use of staging areas southeast of the Camino Del Rio North/Mission City Parkway intersection (issued by the City of San Diego Department of Real Estate and Airport Management)
5. Authority to construct/permits to operate (issued by the San Diego County Air Pollution Control District)
6. Coordination for three-way signal at the Fenton Parkway and River Park Road intersection (coordination with San Diego Metropolitan Transit System)
7. Right of access permit for work within the MTS right-of-way (issued by San Diego Metropolitan Transit System)
8. Water Quality Certification pursuant to Section 401 of the Clean Water Act (issued by the San Diego Regional Water Quality Control Board)
9. Construction Stormwater Permit consistent with the National Pollutant Discharge Elimination System to ensure consistency with the Clean Water Act (issued by the San Diego Regional Water Quality Control Board)
10. Accessibility compliance (issued by the Division of the State Architect)

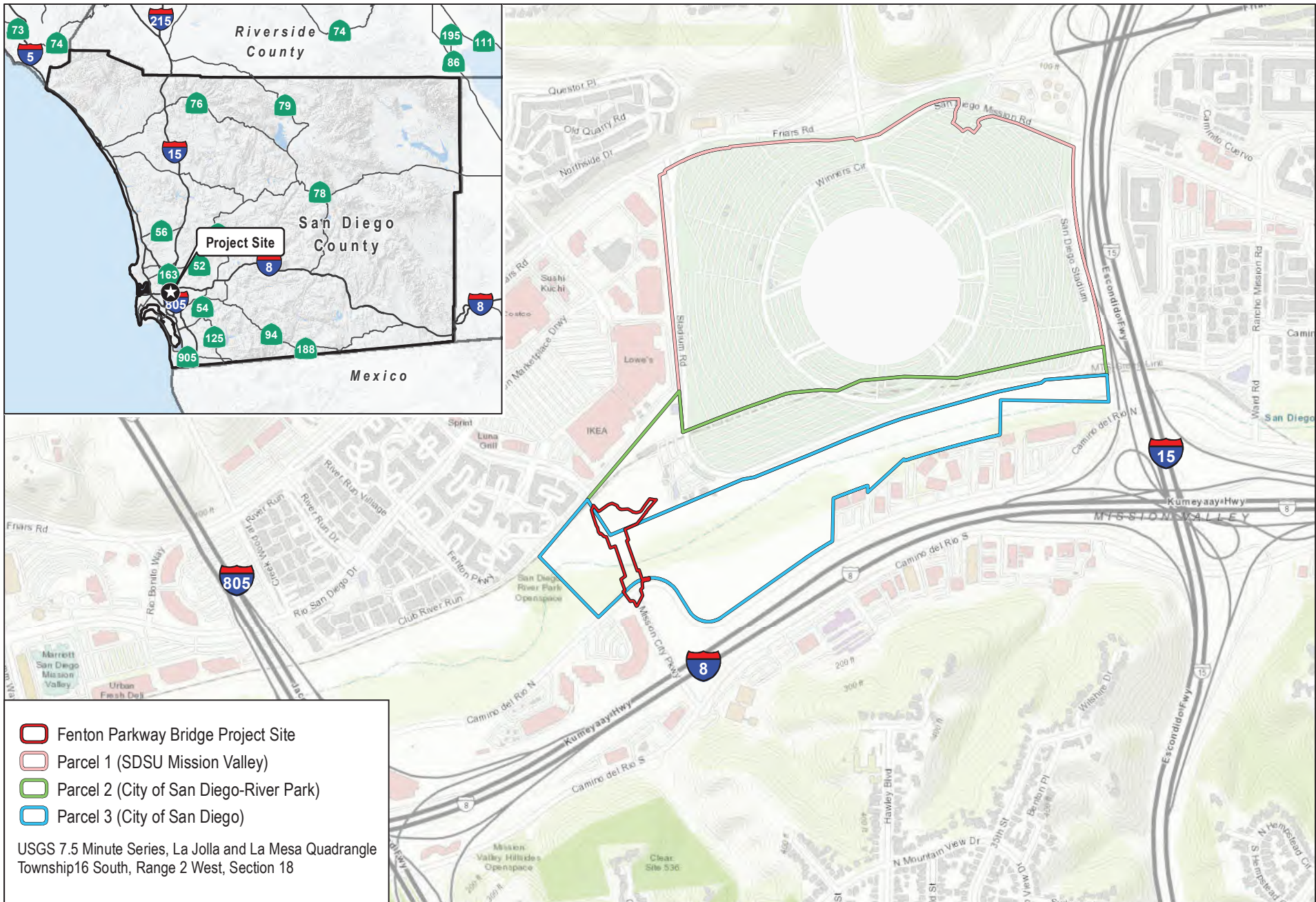
11. Approval of facility fire and life safety review (approval from the State Fire Marshal)
12. Lake and Streambed Alteration Agreement pursuant to Section 1602 of the State of California Fish and Game Code (issued by the California Department of Fish and Wildlife)
13. Consultation with the U.S. Fish and Wildlife Service under Section 7 of the Endangered Species Act (consultation with the U.S. Fish and Wildlife Service)
14. Department of the Army permit pursuant to Section 404 of the Clean Water Act (issued by the US Army Corps of Engineers)

**Public Information/Scoping Meeting:** SDSU will hold a public information/scoping meeting on June 5, 2023 to present an overview of the project and to solicit public input regarding the proposed scope and content of the Draft EIR. The meeting will take place as follows:

Mission Valley Library  
2123 Fenton Parkway  
San Diego, California 92108  
June 5, 2023  
6:00 pm – 7:30 pm

All public agencies, organizations, and interested parties are encouraged to attend and participate at the meetings. The failure of any public agency, organization, or interested party to attend the scoping meetings or submit written comments may prevent that agency, organization, or party from later asserting that issues excluded by the initial study should have been included in the Draft EIR.





SOURCE: ESRI MAPPING SERVICE; BOWMAN/PDC 5/08/2023



**FIGURE 1**  
Project Vicinity and Location  
Fenton Parkway Bridge Project

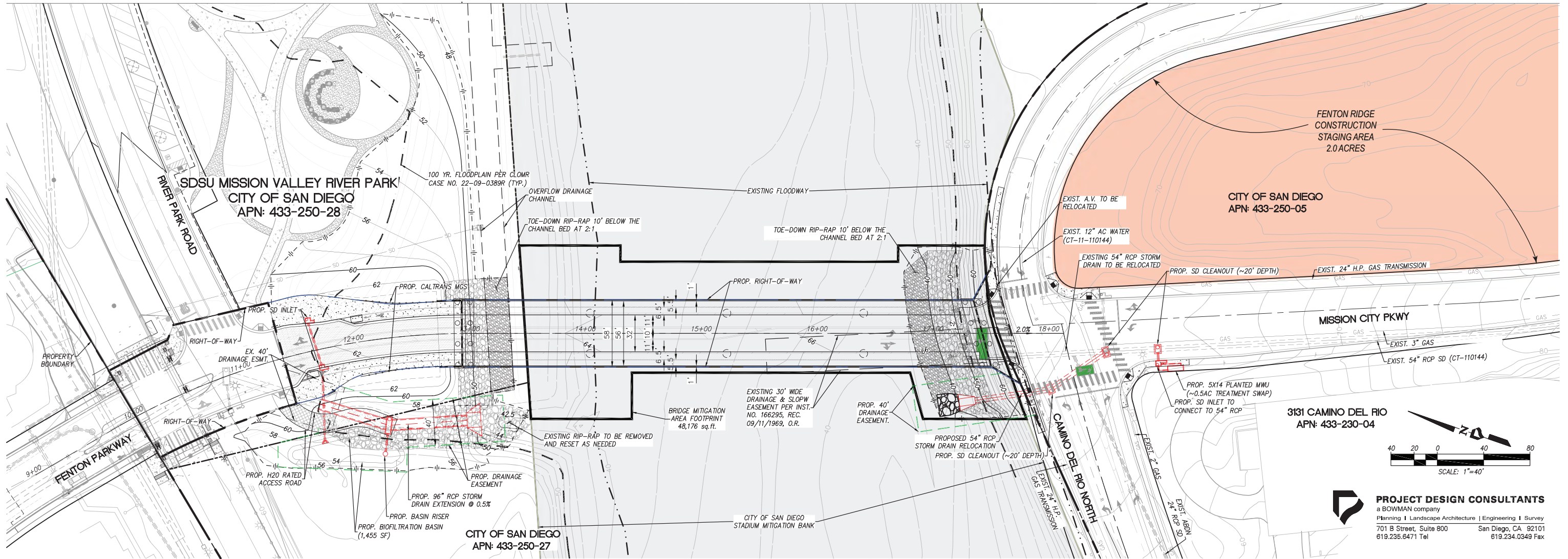
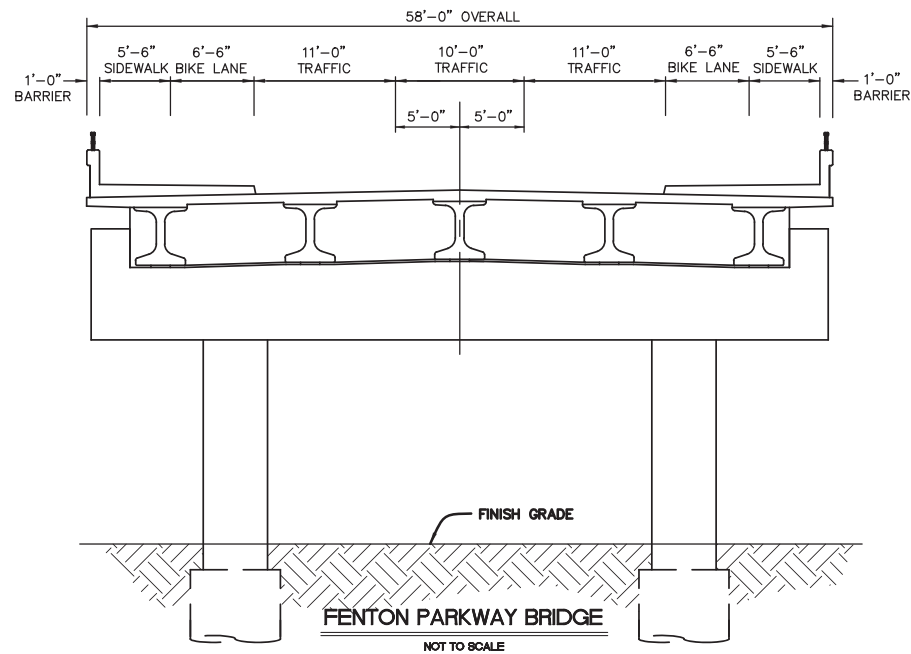
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SOURCE: AERIAL-ESRI IMAGERY SERVICE; KLEINFELDER 2/8/2023  
 DEVELOPMENT-BOWMAN/PDC 5/08/2023; PARCELS-BOWMAN/PDC 3/27/2023

**FIGURE 2**  
**Project Site**  
 Fenton Parkway Bridge Project

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SOURCE: BOWMAN/PDC 5/08/2023

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Initial Study

# Fenton Parkway Bridge Project

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**MAY 2023**

*Prepared for:*

**THE BOARD OF TRUSTEES OF THE  
CALIFORNIA STATE UNIVERSITY**

401 Golden Shore  
Long Beach, California 90802

*Prepared by:*

**SAN DIEGO STATE UNIVERSITY  
FACILITIES PLANNING, DESIGN,  
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# Acronyms and Abbreviations

Acronym/Abbreviation	Definition
AB	Assembly Bill
bridge	Fenton Parkway Bridge
Caltrans	California Department of Transportation
campus	SDSU Mission Valley campus
CBC	California Building Code
CDFW	California Department of Fish and Wildlife
CEQA	California Environmental Quality Act
City	City of San Diego
CSU	California State University
CWA	Clean Water Act
DOC	California Department of Conservation
DTSC	Department of Toxic Substances Control
EIR	environmental impact report
FRD	Fire-Rescue Department
GHG)	greenhouse gas
I	Interstate
LRA	local responsibility area
MHPA	Multi-Habitat Planning Area
MOU	Memorandum of Understanding
MRZ	Mineral Resource Zone
MSCP	Multiple Species Conservation Program
MTS	San Diego Metropolitan Transit System
project	Fenton Parkway Bridge Project
RCP	reinforced concrete pipe
RWQCB	Regional Water Quality Control Board
SDS	San Diego State University
SR	State Route
SWRCB	State Water Resources Control Board
USACE	U.S. Army Corps of Engineers
UWMP	Urban Water Management Plan
VMT	vehicle miles traveled

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# 1 Introduction

## 1.1 Project Overview

San Diego State University (SDSU) is proposing construction and operation of the Fenton Parkway Bridge Project (project) to connect Fenton Parkway with Camino Del Rio North in the City of San Diego (City). The Fenton Parkway Bridge (bridge) would span the San Diego River in the Mission Valley Community of the City (see Figure 1, Project Vicinity and Location). The project would involve construction of an approximately 450-foot bridge spanning the San Diego River from north to south (see Figure 2, Project Site). The bridge would consist of up to four spans and include combined bicycle and pedestrian pathways (see Figure 3, Project Site Plan). The project would create a vehicular, bicycle, and pedestrian connection across the San Diego River that, upon completion, would be owned and maintained by the City as part of the City’s public street system. For further information on the project, see Section 2, Project Description.

## 1.2 California Environmental Quality Act Compliance

The California Environmental Quality Act (CEQA) applies to proposed projects initiated by, funded by, or requiring discretionary approvals from state or local government agencies. The proposed project constitutes a “project” as defined by CEQA (California Public Resources Code, Section 21000 et seq.) and Title 14 of the California Code of Regulations, Section 15000 et seq. (hereafter, “CEQA Guidelines”). CEQA Guidelines Section 15367 states that a “Lead Agency” is “the public agency which has the principal responsibility for carrying out or approving a project.” Both the Board of Trustees of the California State University (CSU) and the City have a substantial claim to be the lead agency for the project and, pursuant to CEQA Guidelines Section 15051(d), entered into a Memorandum of Agreement dated December 6, 2022 designating the CSU as the sole lead agency. SDSU is an entity of the CSU, which is the State of California acting in its higher education capacity. As such, the Board of Trustees of the CSU is the CEQA lead agency for the environmental document.

SDSU has prepared an initial study in accordance with the CEQA Guidelines. The initial study identifies the potential environmental effects associated with the planning, construction, implementation, and operation of the project and satisfies the content requirements of CEQA Guidelines Section 15063(d)(1)-(6). Based on the conclusions of the initial study evaluation and pursuant to CEQA Guidelines Section 15063(b)(1)(A), SDSU has determined that there is substantial evidence, in light of the whole record, that the project may have a significant effect on the environment. Therefore, SDSU will prepare an environmental impact report (EIR) in accordance with CEQA Guidelines Article 9, Sections 15120 to 15132. This initial study will assist in preparing the EIR by, among other things, (a) focusing the EIR on the environmental effects determined to be potentially significant, (b) identifying the effects determined not to be significant, and (c) explaining the reasons for determining that potentially significant effects would not be significant.

Because the analysis in the initial study determined that the project would not result in significant impacts for all environmental categories, SDSU proposes to scope out the following topics from further evaluation in the EIR: agriculture and forestry resources, historic built-environment resources (pursuant to CEQA Guidelines Section 15064.5), soils supporting the use of septic tanks or alternative waste water disposal systems, emission/handling of hazardous materials within 0.25 miles of schools, hazardous materials sites (pursuant to Government Code Section 65962.5), safety hazards/excessive noise within two miles an airport, physical division

of an established community, mineral resources, population and housing, public services, recreation, water supply, and wastewater capacity. As such, these topics will not be analyzed in the EIR.

## 1.3 Public Review Process

In reviewing the initial study, agencies and the interested public should focus on the sufficiency of the document in identifying the potential impacts of the proposed project on the environment. Responsible and trustee agencies—including the City, the U.S. Fish and Wildlife Service, the U.S. Army Corps of Engineers (USACE)—the California Department of Fish and Wildlife (CDFW), and the Regional Water Quality Control Board (RWQCB) should provide specific detail about the scope and content of the environmental information related to the responsible or trustee agency’s area of responsibility.

Comments may be made on the Initial Study in writing during the public comment period, between May 22, 2023, and June 20, 2023. All written comments received on or before 5 p.m. PST June 20, 2023, will be considered. A copy of the Notice of Preparation and this Initial Study are available for review on the SDSU website at <https://bfa.sdsu.edu/campus/facilities/planning/eir> . Following the close of the public comment period, SDSU will consider this initial study and comments thereon in preparing the EIR. Comments on the initial study should be sent to the following address or via email to:

**Paul Jackson, Program Manager**

5500 Campanile Drive

San Diego, California 92182-1624

pjackson@sdsu.edu

858.886.6883

pjackson@sdsu.edu

## 1.4 Document Organization

This initial study is organized as follows:

**Section 1: Introduction.** This section provides an introduction to the environmental review process. It describes the purpose and organization of this document and presents a summary of findings.

**Section 2: Project Description.** This section describes the purpose of and need for the proposed project, identifies project objectives, and provides a detailed description of the project.

**Section 3: Initial Study Checklist.** This section presents an analysis of a range of environmental issues identified in the CEQA Environmental Checklist and determines if project actions would result in no impact, a less-than-significant impact, or a potentially significant impact that will be further analyzed in the Draft EIR.

**Section 4: References and List of Preparers.** This section lists the references used in preparation of this initial study/mitigated negative declaration and identifies report preparers.

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## 2 Project Description

SDSU is proposing to plan, design, and construct the project to connect Fenton Parkway, which currently terminates north of the river channel, with Camino Del Rio North, south of the river channel. The bridge would span the San Diego River (river) in the Mission Valley community of the City. The proposed bridge will be constructed on real property owned by the City and upon the completion of construction, the City will own, operate, and maintain the proposed bridge.

### 2.1 Project Location and Existing Conditions

As previously described, the project site is located in the northeast portion of the Mission Valley Community, in the central portion of the City's metropolitan area (see Figure 1). The project site is situated south of Fenton Parkway and the Fenton Marketplace and north of Camino Del Rio North and would connect these two roadways. The San Diego River bisects the project site from east to west. Surrounding uses include commercial and residential uses to the north, the SDSU Mission Valley development (including Snapdragon Stadium) to the northeast, office and healthcare uses to the south, and open space, including the San Diego River. The bridge would traverse and be adjacent to the City's Multi-Habitat Planning Area (MHPA) as well as the City's Stadium Mitigation Site.

The project site is surrounded by four major freeways—Interstate (I) 15, I-8, I-805, and State Route (SR) 163—accessed via Friars Road. The existing Metropolitan Transit System (MTS) Trolley Green Line and MTS Stadium Trolley Station are located on the north bank of the San Diego River, northwest of the project site, as shown in Figure 1 and Figure 2.

### 2.2 Project Background

The Fenton Parkway Bridge has been contemplated in the City's long-range planning documents for the Mission Valley community for more than 30 years as a local facility that serves the needs of the Mission Valley community and benefits the public. The proposed project is referenced in the Mission Valley Community Plan (adopted by the City in 2019) and is a long-sought infrastructure enhancement in the Mission Valley community as a means of connecting residents and businesses south of the San Diego River to land uses north of the river off Friars Road, including the SDSU Mission Valley development, which was approved by the Trustees of the CSU in 2020 (City of San Diego 2019). SDSU Mission Valley includes Snapdragon Stadium and will include parks, open space, and new residential, commercial and innovation district uses. The proposed project would facilitate an additional vehicular, bicycle, and pedestrian connection between the businesses and residential areas north and south of the San Diego River.

As part of the purchase and sale agreement between SDSU and the City for the SDSU Mission Valley site, which was executed in August 2020, the CSU agreed to help fund the planning, design, and construction of the Fenton Parkway Bridge. In furtherance thereof, and pursuant to a Memorandum of Understanding (MOU) between the CSU and the City and City Ordinance No. O-21564, the CSU (SDSU) has agreed to plan, design, and construct the bridge to City transportation department design standards on behalf of the City. As more particularly described in the MOU, the CSU and the City have agreed to work collaboratively on the bridge project; SDSU is responsible for planning, design, environmental review and permitting, and construction of the bridge, with City input. Additionally, the CSU and the City will share the costs of the project. Once constructed, the City would assume ownership and operational and maintenance obligations for the bridge.

As outlined in the MOU, the CSU (SDSU) is preparing the environmental impact report, and the Trustees of the CSU will serve as the lead agency under CEQA. The City will serve as a responsible agency under CEQA. SDSU is also responsible for securing all environmental permits required from state and federal agencies.

## 2.3 Project Elements

The project would involve construction of a vehicular and pedestrian bridge spanning the San Diego River from north to south (see Figure 2). The design and construction of the approach roadways and bridge would comply with applicable City, County of San Diego, and California Department of Transportation (Caltrans) design standards, as well as American Association of State Highway and Transportation Officials guidelines.

### 2.3.1 Bridge Design and Mobility Improvements

The proposed design for the bridge is a conventional post-tensioned, trapezoidal, concrete box girder structure. The bridge would be approximately 450 feet long, 58 feet wide, and 7 feet, 6 inches deep, and would consist of up to four spans. The spans would be supported on concrete seat-type abutments in the river embankments at each end and two to three piers within the river channel, each consisting of two to three approximately 20-foot-tall, 6-foot-diameter circular concrete columns. Each abutment would be supported on eight 4-foot-diameter, cast-in-drilled-hole concrete piles, and each of the four columns would be supported on a single 8-foot-diameter cast-in-drilled-hole concrete pile. Piles are currently estimated to be drilled to depths between 50 and 200 feet below existing grade. Each of the abutments will be protected with energy dissipating riprap that will be buried to allow for plant growth over the riprap.

Bridge lighting would be mounted on the side barriers outside of the pedestrian walkways. The bridge would connect the southern terminus of Fenton Parkway to the northern terminus of Camino Del Rio North/Mission City Parkway. The new bridge would include two 11-foot-wide through-traffic lanes and a 10-foot-wide center lane that would be used for southbound left-turn movements onto Camino Del Rio North. The 10-foot center lane would provide an optional additional traffic lane for flexible use during stadium or emergency events.

Combined bicycle and pedestrian pathways would be installed and raised above the travel lanes on either side of the bridge. The 6-foot, 6-inch-wide bike lane would be separated from a 5-foot, 6-inch-wide pedestrian path by a 6-inch-wide strip of yellow truncated domes (see Figure 3).

### 2.3.2 Utilities

Existing utilities in the project area include a 96-inch reinforced concrete pipe (RCP) storm drain on the north side of the proposed bridge and a 54-inch storm drain along the proposed southern terminus of the bridge at Camino Del Rio North, both of which discharge directly into the San Diego River. These existing storm drains would require relocation and/or extension during project construction to accommodate storm drain outfalls into the river without impacting the bridge's structural integrity.

The 96-inch RCP storm drain located near the northern terminus of the bridge would be extended south to accommodate the Fenton Parkway extension and abutments of the proposed bridge. Extension of the existing storm drain would require removal of the existing headwall and construction of a new headwall at the end of the extended 96-inch RCP storm drain.



The existing 54-inch storm drain located near the southern terminus of the bridge would conflict with the proposed bridge abutment location. As a result, the storm drain would be relocated west of the proposed south bridge abutment. The outlet of the storm drain would require construction of a new headwall with riprap at the outfall for erosion protection and energy dissipation.

The proposed bridge would include 24-inch cells that could accommodate potential future wet utilities. Wet utility extensions through the bridge are not part of the proposed project.

### 2.3.3 Off-Site Improvements

Implementation of the project would include the following off-site improvements:

- **Fenton Parkway and River Park Road Intersection:** The Fenton Parkway and River Park Road intersection, which is currently under construction, would be expanded to a three-legged configuration with the new bridge approach forming the south leg of the intersection. A three-way signal would be installed at the Fenton Parkway and River Park Road intersection.
- **Mission City Parkway and Camino Del Rio North Intersection:** The Mission City Parkway and Camino Del Rio North intersection would also be expanded from a three-way signal-controlled intersection under existing conditions to a four-way signal-controlled intersection, with the Fenton Parkway extension on the new bridge forming the new north leg. The existing traffic signal would be modified to include new signal heads for the Fenton Parkway approach as well as pedestrian crossing features such as high-visibility crosswalks, pedestrian-initiated interval phasing, and countdown timers. The center lane on the bridge would lead into a new southbound left-turn lane at Camino Del Rio North, and a new dedicated left-turn lane would be striped on eastbound Camino Del Rio North to allow left turns onto the bridge. The south leg of the intersection would be restriped to include a shared through-/right-turn lane in addition to a separate northbound left-turn lane to Camino Del Rio North.

The west leg of the intersection would be re-striped to include a westbound bike lane for approximately 225 feet to connect to the existing bike lane further west. Appropriate connections for bicyclists on Mission City Parkway would be made based on the current facilities on that roadway.

### 2.3.4 Design Standards and Energy Efficiency

Project design and implementation would be consistent with the CSU's Sustainability Policy (adopted in May 2014 and recently updated in May 2022). The EIR will evaluate the project's consistency with the City's climate action planning guidance, which includes prioritization of infrastructure projects that support sustainable mode choices, including walking, bicycling, ride-sharing, and public transit use.

## 2.4 Project Construction and Phasing

Development of the project would occur in two phases: (1) site preparation and (2) project construction. Construction is estimated to occur over a period of approximately 14 months.

## 2.4.1 Phase 1 – Site Preparation

Prior to the commencement of construction activities, the project site would be surveyed and fenced, followed by clearing and grubbing of the construction disturbance area. Any necessary stormwater best management practices or temporary fencing or catchment dams to establish bridge pier work areas will be established during this initial site preparation phase. No vegetation clearing, removal, and/or disturbance would occur outside of the bridge impact boundaries shown in Figure 2. Phase 1 is estimated to occur over a period of 3 weeks.

## 2.4.2 Phase 2 – Bridge Construction

Following the necessary underground soil improvement and construction of fill slopes involving approximately 15,000 cubic yards of imported fill, the bridge abutment footings would be excavated from the embankments to install deep cast-in-drilled-hole concrete piles. This excavation may require temporary shoring along Camino Del Rio North. Larger cast-in-drilled-hole piles would also be installed at each of the bridge column locations. Excavation of approximately 4,000 cubic yards of soil would be required for bridge abutment footings, piers, riprap, and utility relocations. Groundwater dewatering may also be necessary given the very high water table. The maximum depth of remedial grading excavation is anticipated to extend to approximately 5 feet above measured groundwater levels. Following the deep pile foundation installation, concrete bridge abutments and columns would be formed and poured, along with a large concrete retaining wall extending about 100 feet northward from the bridge along the west side of the roadway.

Bridge superstructure construction would follow and involves either casting concrete pumped into forms supported on temporary falsework supports or lifting precast concrete girders into position atop the columns. In either case, the bridge deck is then cast in place and finished to the correct profile. Concrete sidewalks, barriers, lights, and metal railings would then be installed along the length of the bridge. Once access to the river channel is no longer required for construction activities, riprap slope protection would be installed around each abutment for erosion and sediment control. Additionally, areas where native vegetation is removed during Phase 1 of the project would be reseeded or replanted with appropriate native plant species. These restored areas would be monitored consistent with resource agency permit requirements applicable to the City Mitigation Site to ensure restoration meets appropriate success criteria.

Phase 2 is estimated to occur over a period of approximately 57 weeks (and would require a total of approximately 300 construction personnel across the duration of construction activities).

## 2.4.3 Hours of Construction

In general, construction activities would be limited to between 7:00 a.m. and 5:30 p.m. Monday through Saturday, which would be consistent with the provisions of the City’s noise ordinance. However, limited nighttime and Sunday work may be required.

## 2.4.4 Construction Laydown and Staging Areas

Project construction laydown and staging areas would be located either south of the proposed bridge, on the City-owned undeveloped property east of Mission City Parkway and west of Camino Del Rio North, and/or within the City-owned park land west and east of the proposed Fenton Parkway Bridge and south of River Park Road and SDSU Mission Valley (see Figure 2-2).

## 2.4.5 Anticipated Road Closures and Traffic Control Measures

It is not anticipated that any road closures would be necessary for the construction of the Fenton Parkway Bridge. Existing travel lanes on Camino Del Rio North may be shifted or narrowed to accommodate bridge construction and replacement/relocation of traffic signal poles, curbs, gutters, and sidewalks. The majority of construction activity would occur outside of existing roadways. However, targeted lane closures to complete the traffic signal and striping adjustments at Camino Del Rio North at Mission City Parkway are anticipated. Temporary traffic control measures (e.g., lane closures, signage) would be provided during such closures as well as around identified construction laydown/staging areas.

## 2.5 Project Maintenance

Once operational, the City would engage in routine street sweeping and debris removal. The City would also maintain streetlights, roadway striping and ensure that all signage is maintained.

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# 3 Initial Study Checklist

**1. Project title:**

Fenton Parkway Bridge Project

**2. Lead agency name and address:**

The Board of Trustees of The California State University  
401 Golden Shore  
Long Beach, California 90802

**3. Contact person and address:**

Paul Jackson  
San Diego State University  
Facilities Planning, Design, and Construction  
5500 Campanile Drive  
San Diego, California 92182-1624

**4. Project location:**

The proposed bridge (project site) is located in the northeast portion of the Mission Valley Community, in the central portion of the City (see Figure 1). A portion of the project site lies adjacent to the City's Stadium Wetland Mitigation Site. The project site is situated south of Fenton Parkway and north of Camino Del Rio North. The San Diego River bisects the project site from east to west.

**5. Project sponsor's name and address:**

Paul Jackson, Program Manager  
5500 Campanile Drive  
San Diego, California 92182-1624  
858.886.6883

**6. General plan designation:**

The project site is designated as Open Space/Parks, Recreation, and Undeveloped (SANDAG 2023).

**7. Zoning:**

The project site is zoned as Open Space-Floodplain (OF-1-1), Employment Mixed-Use (EMX-2), and Residential Single Unit (RS-1-14) (City of San Diego 2021a).

**8. Description of project. (Describe the whole action involved, including but not limited to later phases of the project, and any secondary, support, or off-site features necessary for its implementation. Attach additional sheets if necessary):**

Refer to Section 2, Project Description, for more information about the proposed project. The project would involve construction and operation of a multimodal (i.e., vehicular, bicycle, and pedestrian) bridge that spans the San Diego River from north to south. Construction and operation of the bridge would include combined bicycle and pedestrian pathways raised above the travel lanes on either side of the bridge and new lighting consistent with the City's street/bridge design standards. Existing storm drain infrastructure in the project area, including a 96-inch reinforced concrete pipe storm drain and a 54-inch storm drain, would require relocation and/or extension during project construction to accommodate proposed bridge structure abutments.

The Fenton Parkway/River Park Road intersection, which is currently under construction, would be expanded to a three-legged configuration with the new bridge approach forming the south leg of the intersection. The intersection would be signalized and include pedestrian crossing features such as high-visibility crosswalks, pedestrian-initiated interval phasing, and crosswalk countdown meters. The existing striped bike lanes on Fenton Parkway north of the trolley tracks would be extended to River Park Road; these lanes would lead to ramps connecting the elevated bike lanes on the new bridge. Additionally, a three-way signal would be installed at the Fenton Parkway/River Park Road intersection.

**9. Surrounding land uses and setting: Briefly describe the project's surroundings:**

Surrounding uses include commercial and residential uses to the north, SDSU Mission Valley (including Snapdragon Stadium) to the northeast, office and healthcare uses to the south, and open space, including the San Diego River. The project site is surrounded by four major freeways—I 15, I-8, I-805, and SR-163—accessed via Friars Road. The existing MTS Trolley Green Line and MTS Stadium Trolley Station are located on the north bank of the San Diego River, northwest of the project site.

**10. Other public agencies whose approval is required (e.g., permits, financing approval, or participation agreement):**

Due to the potential for impacts to special-status species or wetland areas or waters of the United States, permitting and coordination with the U.S. Fish and Wildlife Service, CDFW, RWQCB, and/or USACE would occur.

**11. Have California Native American tribes traditionally and culturally affiliated with the project area requested consultation pursuant to Public Resources Code section 21080.3.1? If so, is there a plan for consultation that includes, for example, the determination of significance of impacts to tribal cultural resources, procedures regarding confidentiality, etc.?**

In accordance with California Assembly Bill (AB) 52 requirements, SDSU will initiate tribal consultation, the results of which will be summarized in the Draft EIR.

### Environmental Factors Potentially Affected

The environmental factors checked below would be potentially affected by this project, involving at least one impact that is a “Potentially Significant Impact,” as indicated by the checklist on the following pages.

- |   |  |  |
|---|--|--|
| <input checked="" type="checkbox"/> Aesthetics                    | <input type="checkbox"/> Agriculture and Forestry Resources  | <input checked="" type="checkbox"/> Air Quality                        |
| <input checked="" type="checkbox"/> Biological Resources          | <input checked="" type="checkbox"/> Cultural Resources       | <input checked="" type="checkbox"/> Energy                             |
| <input checked="" type="checkbox"/> Geology and Soils             | <input checked="" type="checkbox"/> Greenhouse Gas Emissions | <input checked="" type="checkbox"/> Hazards and Hazardous Materials    |
| <input checked="" type="checkbox"/> Hydrology and Water Quality   | <input checked="" type="checkbox"/> Land Use and Planning    | <input type="checkbox"/> Mineral Resources                             |
| <input checked="" type="checkbox"/> Noise                         | <input type="checkbox"/> Population and Housing              | <input type="checkbox"/> Public Services                               |
| <input type="checkbox"/> Recreation                               | <input checked="" type="checkbox"/> Transportation           | <input checked="" type="checkbox"/> Tribal Cultural Resources          |
| <input checked="" type="checkbox"/> Utilities and Service Systems | <input checked="" type="checkbox"/> Wildfire                 | <input checked="" type="checkbox"/> Mandatory Findings of Significance |

**Determination (To be completed by the Lead Agency)**

On the basis of this initial evaluation:

- I find that the proposed project COULD NOT have a significant effect on the environment, and a NEGATIVE DECLARATION will be prepared.
- I find that although the proposed project could have a significant effect on the environment, there will not be a significant effect in this case because revisions in the project have been made by or agreed to by the project proponent. A MITIGATED NEGATIVE DECLARATION will be prepared.
- I find that the proposed project MAY have a significant effect on the environment, and an ENVIRONMENTAL IMPACT REPORT is required.
- I find that the proposed project MAY have a “potentially significant impact” or “potentially significant unless mitigated” impact on the environment, but at least one effect (1) has been adequately analyzed in an earlier document pursuant to applicable legal standards, and (2) has been addressed by mitigation measures based on the earlier analysis as described on attached sheets. An ENVIRONMENTAL IMPACT REPORT is required, but it must analyze only the effects that remain to be addressed.
- I find that although the proposed project could have a significant effect on the environment, because all potentially significant effects (a) have been analyzed adequately in an earlier ENVIRONMENTAL IMPACT REPORT or NEGATIVE DECLARATION pursuant to applicable standards, and (b) have been avoided or mitigated pursuant to that earlier ENVIRONMENTAL IMPACT REPORT or NEGATIVE DECLARATION, including revisions or mitigation measures that are imposed upon the proposed project, nothing further is required.



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Signature

May 22, 2023

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Date



### 3.1 Aesthetics

	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
<b>I. AESTHETICS</b> – Except as provided in Public Resources Code Section 21099, would the project:				
a) Have a substantial adverse effect on a scenic vista?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b) Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c) In non-urbanized areas, substantially degrade the existing visual character or quality of public views of the site and its surroundings? (Public views are those that are experienced from publicly accessible vantage point). If the project is in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
d) Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

#### a. Scenic Vistas

The project site is located in the Mission Valley Community of the City and is partially within the San Diego River corridor. Vantage points from the project site offer scenic views along the river corridor. Implementation of the project, specifically construction activities associated with the proposed bridge, have the potential to alter scenic views to and from the project site. The Draft EIR will analyze the project’s potential to adversely affect scenic views and vistas. Feasible mitigation measures will be provided (if necessary).

#### b. Scenic Resources within a State Scenic Highway

The nearest officially designated state scenic highways relative to the project site include a portion SR 52 (approximately 6.5 miles northeast), SR 125 (approximately 7 miles east), and a portion of SR 163 through Balboa Park (approximately 3 miles southwest) (Caltrans 2019). Eligible scenic highways within the project vicinity include I-8 (approximately 700 feet south), a portion of SR 163 north of Balboa Park (approximately 2.5 miles southwest), I-5 (approximately 4.7 miles west), and a portion of SR 52 (approximately 4.5 miles north). Scenic resources on the project site include trees and riparian/riverine habitat associated with the San Diego River corridor. Implementation of the project, specifically construction activities associated with the proposed bridge, have the potential to damage scenic resources within the vicinity of I-8, an eligible scenic highway. The Draft EIR will analyze the project’s potential to damage scenic resources within a state scenic highway. Feasible mitigation measures will be provided (if necessary).

**c. Visual Character and Quality**

California Public Resources Code Section 21071 defines an “urbanized area” as “(a) an incorporated city that meets either of the following criteria: (1) Has a population of at least 100,000 persons, or (2) Has a population of less than 100,000 persons if the population of that city and not more than two contiguous incorporated cities combined equals at least 100,000 persons.” There were an estimated 1,381,611 residents in the City in 2021 (U.S. Census Bureau 2023). For the purposes of this discussion, the project site is in an urbanized area.

The project site is designated as Open Space/Parks, Recreation, and Undeveloped, and is zoned as Open Space-Floodplain (OF-1-1), Employment Mixed-Use (EMX-2), and Residential Single Unit (RS-1-14) (SANDAG 2023, City of San Diego 2021a). Surrounding uses include commercial and residential uses to the north, uses associated with SDSU Mission Valley to the northeast, office and healthcare uses to the south, and open space, including the San Diego River, to the east and west. The project site includes scenic resources such as trees and riparian/riverine habitat associated with the San Diego River corridor. Implementation of the project, specifically construction activities associated with the proposed bridge, have the potential to alter the visual character of the project area and conflict with applicable regulations governing scenic quality. The Draft EIR will analyze the project’s potential to conflict with applicable zoning or other regulations governing scenic quality. Feasible mitigation measures will be provided (if necessary).

**d. Lighting and Glare**

Existing sources of light and glare (i.e., interior and exterior building lighting as well as window and vehicle glare) in the project site are limited to surrounding uses. Specifically, light and glare sources are present within the residential and commercial use areas north of the project site, research uses to the northeast, and office and medical uses to the south. No light sources are present within the open space area (i.e., San Diego River and Stadium Wetland Mitigation site). Project construction activities as well as operation of the new bridge would introduce new sources of light within the project area. The Draft EIR will address new sources of light and glare resulting from project construction activities and operation. Feasible mitigation measures will be provided (if necessary).

**3.2 Agriculture and Forestry Resources**

	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
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**II. AGRICULTURE AND FORESTRY RESOURCES** – In determining whether impacts to agricultural resources are significant environmental effects, lead agencies may refer to the California Agricultural Land Evaluation and Site Assessment Model (1997) prepared by the California Dept. Conservation as an optional model to use in assessing impacts on agriculture and farmland. In determining whether impacts to forest resources, including timberland, are significant environmental effects, lead agencies may refer to information compiled by the California Department of Forestry and Fire Protection regarding the state’s inventory of forest land, including the Forest and Range Assessment Project and the Forest Legacy Assessment project; and forest carbon measurement methodology provided in Forest Protocols adopted by the California Air Resources Board. Would the project:

	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Conflict with existing zoning for agricultural use, or a Williamson Act contract?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c) Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code Section 12220(g)), timberland (as defined by Public Resources Code Section 4526), or timberland zoned Timberland Production (as defined by Government Code Section 51104(g))?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d) Result in the loss of forest land or conversion of forest land to non-forest use?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
e) Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland to non-agricultural use or conversion of forest land to non-forest use?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

**a. Convert Farmland to Non-Agricultural Use**

Conversion of Prime Farmland, Unique Farmland, or Farmland of Statewide Importance According to the California Department of Conservation (DOC), the project site is designated as “Urban and Built-Up Land” and as “Other Land.” The project area and surrounding uses do not involve agricultural uses, nor do they include any lands designated as Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland) (DOC 2018). Therefore, the project has no potential to convert Farmland to non-agricultural use. No project impacts would occur, and this topic will not be discussed further in the Draft EIR.

**b. Conflicts with Zoning or a Williamson Act Contract**

The project site is zoned as Open Space-Floodplain (OF-1-1), Employment Mixed-Use (EMX-2), and Residential Single Unit (RS-1-14) (SANDAG 2023; City of San Diego 2021a). The project site and surrounding uses are not zoned for and do not involve agricultural uses. Additionally, the project site is not enrolled in a Williamson Act contract, nor is the project site adjacent to any lands within a Williamson Act contract (DOC 2021). Therefore, the project has no potential to conflict with existing zoning for agricultural uses or a Williamson Act contract. No project impacts would occur, and this topic will not be discussed further in the Draft EIR.

**c. Conflicts with Zoning for Forest Land, Timberland, or Timberland Zoned Timberland Production**

As described above, the project site is zoned as Open Space-Floodplain (OF-1-1), Employment Mixed-Use (EMX-2), and Residential Single Unit (RS-1-14) (SANDAG 2023; City of San Diego 2021a). The project site is not zoned for forest land, timberland, or timberland production uses. No project impacts related to forestry resources would occur, and this topic will not be discussed further in the Draft EIR.

**d. Loss or Conversion of Forest Land**

As discussed above, the project site is not zoned for forest land, timberland, or timberland production uses, nor would the project cause rezoning or conversion of the project site for such uses. No project impacts related to forest land would occur, and this topic will not be discussed further in the Draft EIR.

**e. Conversion of Farmland to Non-Agricultural Use or Conversion of Forest Land to Non-Forest Use**

According to the DOC, the project site is designated as “Urban and Built-Up Land” and as “Other Land.” The project site and surrounding uses do not involve agricultural uses, nor do they include any lands designated as Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland) (DOC 2018). The project site is not zoned for any forest land, timberland, or timberland production uses, nor would the project cause conversion of the project site for such uses. No project impacts related to agricultural or forestry resources would occur, and this topic will not be discussed further in the Draft EIR.

### 3.3 Air Quality

	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
<b>III. AIR QUALITY</b> – Where available, the significance criteria established by the applicable air quality management district or air pollution control district may be relied upon to make the following determinations. Would the project:				
a) Conflict with or obstruct implementation of the applicable air quality plan?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b) Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c) Expose sensitive receptors to substantial pollutant concentrations?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
d) Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

### **a. Conflicts with Applicable Air Quality Plan**

The project site is located within the San Diego Air Basin under the jurisdiction of the San Diego Air Quality Management District, which is the local agency responsible for the administration and enforcement of air quality regulations for the area. Construction activities associated with the project would result in the emission of air pollutants, including fugitive dust and construction vehicle emissions. While operation of the bridge itself would not generate any emissions, indirect vehicle emissions would occur as a result of the new vehicular connection introduced in the project area. Therefore, the project has the potential to conflict with the applicable air quality plan. An air quality technical report will be prepared to analyze the proposed project's effects on air quality. Further, a construction health risk assessment will be prepared to analyze the potential human health effects that may result from construction activities. This topic will be further addressed in the Draft EIR, and feasible mitigation measures will be provided (if necessary).

### **b. Criteria Pollutants**

Construction activities associated with the project may result in the emission of short- and long-term criteria air pollutants from mobile sources, which may contribute to existing non-attainment of air quality standards. Further, project implementation combined with known and reasonably foreseeable growth in the area could result in cumulatively considerable emissions of non-attainment criteria air pollutants. Construction activities associated with the proposed project would result in fugitive dust and construction vehicle emissions. As described above, while operation of the bridge itself would not generate any emissions, long-term operation of the proposed project would introduce a new vehicular connection in the project area that would allow for daily vehicular trips, which would generate vehicle emissions. An air quality technical report will be prepared to analyze the proposed project's effects on air quality. Further, a construction health risk assessment will be prepared to analyze the potential human health effects that may result from construction activities. As such, this topic will be further addressed in the Draft EIR. Feasible mitigation measures will be provided (if necessary).

### **c. Exposure of Sensitive Receptors to Pollutant Concentrations**

Construction activities associated with the proposed project would result in sources of fugitive dust and construction vehicle emissions. Earthwork and construction-related activities would also result in the emission of diesel fumes and other odors typically associated with construction activities. Sensitive receptors located in the vicinity of the construction site, including residences to the north, may be affected. An air quality technical report will be prepared to analyze the proposed project's effects on air quality. Further, a construction health risk assessment will be prepared to analyze the potential human health effects that may result from construction activities. As such, this topic will be further addressed in the Draft EIR. Feasible mitigation measures will be provided (if necessary).

### **d. Other Emissions and Odors**

Construction-related activities would result in the emission of diesel fumes and other odors typically associated with construction activities. Any odors associated with construction activities would be temporary and would cease upon project completion; however, construction is anticipated to occur over an approximate 14-month period. Once construction is complete, operation of the bridge would not result in any direct emissions or associated odors. However, as described above, implementation of the project would introduce a new vehicular connection in the project area that would allow for daily vehicular trips, which would generate vehicle emissions and related odors. As such, this topic will be further addressed in the Draft EIR, and feasible mitigation measures will be provided (if necessary).

### 3.4 Biological Resources

	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
<b>IV. BIOLOGICAL RESOURCES – Would the project:</b>				
a) Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b) Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c) Have a substantial adverse effect on state or federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
d) Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
e) Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
f) Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

#### a. Candidate, Sensitive, or Special-Status Wildlife Species

Implementation of the project involves construction activities within the San Diego River corridor, which is considered to be a biologically sensitive area. As a result, project activities may have the potential to result in direct and/or indirect impacts to species identified as a candidate, sensitive, or special status species. A Biological Resources technical report will be prepared to analyze the proposed project’s potential to adversely affect biological resources, including wildlife species. As such, the Draft EIR will further analyze this topic and identify feasible mitigation measures (if necessary).

## **b. Riparian Habitat or Other Sensitive Natural Communities**

Implementation of the project involves construction activities within the San Diego River corridor, which is considered to be a biologically sensitive area. As a result, project activities may have the potential to adversely affect riparian habitat or other sensitive natural communities. A Biological Resources technical report will be prepared to analyze the proposed project's potential to adversely affect biological resources, including riparian habitat or other sensitive natural communities. As such, the Draft EIR will further analyze this topic and identify feasible mitigation measures (if necessary).

## **c. State or Federally Protected Wetlands**

Because the project site traverses and would impact portions of the San Diego River corridor, a formal jurisdictional delineation will be conducted within the project study area in order to identify areas potentially under the jurisdiction of CDFW pursuant to Sections 1600–1603 of the California Fish and Game Code, USACE pursuant to Section 404 of the federal Clean Water Act (CWA), and RWQCB pursuant to CWA Section 401 and the Porter-Cologne Act. An evaluation of the project's relationship to the City's Stadium Mitigation Site will also be performed. A Biological Resources technical report will be prepared to analyze the proposed project's potential to adversely affect biological resources, including wetlands. As such, the Draft EIR will further analyze this topic and identify feasible mitigation measures (if necessary).

## **d. Migratory Species, Wildlife Corridors, or Nursery Sites**

Implementation of the project involves construction activities within the San Diego River corridor, which is considered to be a biologically sensitive area. As a result, project activities may have the potential to adversely affect riparian habitat and interfere with the movement/migration of native or wildlife species. A Biological Resources technical report will be prepared to analyze the proposed project's potential to adversely affect biological resources, including migratory species, wildlife corridors, and/or nursery sites. As such, the Draft EIR will further analyze this topic and identify feasible mitigation measures (if necessary).

## **e. Local Policies or Ordinances Protecting Biological Resources**

Implementation of the project involves construction activities within the San Diego River corridor, which is considered a biologically sensitive area. As a result, project activities may result in direct and/or indirect impacts to biological resources, and there is potential for the project to conflict with local policies and ordinances, including those intended for tree protection and/or preservation. A Biological Resources technical report will be prepared to analyze the proposed project's potential to adversely affect biological resources, including conflicts with local policies and ordinances. The Draft EIR will further analyze this topic and identify feasible mitigation measures (if necessary).

## **f. Adopted Conservation Plans**

Implementation of the project involves construction activities within the San Diego River corridor, which includes habitat and supports species identified in the City's Multiple Species Conservation Program (MSCP) Subarea Plan and associated MHPA. Therefore, implementation of the project has the potential to conflict with the MSCP Subarea Plan and associated MHPA. A Biological Resources technical report will be prepared to analyze the proposed project's potential to adversely affect biological resources, including conflicts with adopted conservation plans. The Draft EIR will further analyze this topic and identify feasible mitigation measures (if necessary).

### 3.5 Cultural Resources

	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
<b>V. CULTURAL RESOURCES – Would the project:</b>				
a) Cause a substantial adverse change in the significance of a historical resource pursuant to Section 15064.5?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b) Cause a substantial adverse change in the significance of an archaeological resource pursuant to Section 15064.5?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c) Disturb any human remains, including those interred outside of formal cemeteries?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

#### a. Historical Resources

The project site includes portions of existing roadways, ruderal areas, and undisturbed river/riparian areas. The project site does not contain any built structures (i.e., buildings). A Cultural Resources Technical Report will be prepared to inform the cultural section of the Draft EIR, including a review of California Historical Resources Information Center records, to identify any historical features, landscapes, or sites within the project site and surrounding area. As such, impacts related to substantial adverse changes to a historical resource pursuant to Section 15064.5 will be further evaluated in the Draft EIR. Mitigation measures will be identified (if necessary).

#### b. Archaeological Resources

The project site includes undeveloped areas that have not been subject to previous earth-moving activities and is located in a “Moderate” Cultural Sensitivity Area Overlay Zone (City of San Diego 2023a). Ground-disturbing activities associated with construction of the project (e.g., grading, drilling, and/or excavation to facilitate bridge columns, fill slopes, abutment footings, and concrete piles) have the potential to encounter and/or disturb intact subsurface archeological deposits that may be present below the ground surface. A Cultural Resources Technical Report will be prepared to evaluate potential project impacts related to archeological resources. As such, the Draft EIR will evaluate project impacts related to archeological resources and identify mitigation measures (if necessary).

#### c. Human Remains

The project site includes undeveloped areas that have not been subject to previous earth-moving activities and is located in a “Moderate” Cultural Sensitivity Area Overlay Zone (City of San Diego 2023a). Ground-disturbing activities associated with construction of the project (e.g., grading, drilling, and/or excavation to facilitate bridge columns, fill slopes, abutment footings, and concrete piles) have the potential to encounter and/or disturb human remains that may be present below the ground surface. A Cultural Resources Technical Report will be prepared to evaluate potential project impacts related to human remains. As such, the Draft EIR will evaluate potential project impacts related to human remains and identify mitigation measures (if necessary).



### 3.6 Energy

	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
<b>VI. Energy</b> – Would the project:				
a) Result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b) Conflict with or obstruct a state or local plan for renewable energy or energy efficiency?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

#### a. Wasteful, Inefficient, or Unnecessary Consumption of Energy Resources

Implementation of the project would result in use of energy resources during project construction activities. The Draft EIR will include an energy impact analysis for the proposed project. As such, the Draft EIR will evaluate project impacts related to wasteful, inefficient, or unnecessary consumption of energy resources and will identify mitigation measures (if necessary).

#### b. Conflict With or Obstruct a State or Local Plan

Implementation of the project would result in use of energy resources during project construction activities. The Draft EIR will include an energy impact analysis for the proposed project. As such, the Draft EIR will evaluate the project’s potential to conflict with applicable adopted plans for renewable energy or energy efficiency and will identify mitigation measures (if necessary).

### 3.7 Geology and Soils

	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
<b>VII. GEOLOGY AND SOILS</b> – Would the project:				
a) Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving:				

	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
i) Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
ii) Strong seismic ground shaking?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
iii) Seismic-related ground failure, including liquefaction?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
iv) Landslides?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b) Result in substantial soil erosion or the loss of topsoil?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c) Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction or collapse?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
d) Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial direct or indirect risks to life or property?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
e) Have soils incapable of adequately supporting the use of septic tanks or alternative waste water disposal systems where sewers are not available for the disposal of waste water?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
f) Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

**a. Rupture of a Known Earthquake Fault**

**i) Alquist-Priolo Earthquake Fault Zones**

The Mission Gorge fault, a quaternary fault line, traverses a portion of the San Diego River, northeast to southwest. Additionally, the Rose Canyon Fault, Florida Canyon Fault, and La Nacion Fault zones are located within the project vicinity (DOC 2015). The potential for ground rupture with nearby faulting exists. Project design and construction would be consistent with the California Building Code (CBC) and the CSU Seismic Requirements, which mandates, in part, that all new structures must provide an acceptable level of earthquake safety for students, employees, and the public to the extent feasible (CSU 2020). The Draft EIR will evaluate potential impacts associated with seismic fault rupture and will identify feasible mitigation measures (if necessary).

## ii) Seismic Ground Shaking

The potential for strong seismic ground shaking at the project site associated with nearby Mission Gorge fault and other local faults exists. The Draft EIR will evaluate potential impacts associated with seismic ground shaking and will identify feasible mitigation measures (if necessary).

## iii) Liquefaction

Due to nearby faulting, the potential for ground failure, including liquefaction, exists on the project site. The Draft EIR will evaluate potential impacts associated with ground failure (including liquefaction) and will identify feasible mitigation measures (if necessary).

## iv) Landslides

The potential for landslides associated with nearby faulting exists. The Draft EIR will evaluate potential impacts associated with landslides and will identify feasible mitigation measures (if necessary).

## b. Soil Erosion or Loss of Topsoil

Construction activities associated with the proposed project have the potential to result in soil erosion or loss of topsoil. As such, the Draft EIR will evaluate this topic and identify feasible mitigation measures (if necessary).

## c. Unstable Soils or Geologic Units

Construction activities and/or a seismic event associated with nearby regional faults could result in landslides, liquefaction, settlement, lateral spread, and/or subsidence of any unstable soils or geologic units underlying the project. The Draft EIR will evaluate potential impacts associated with unstable soils or geologic units and will identify feasible mitigation measures (if necessary).

## d. Expansive Soils

Project construction activities and/or a seismic event associated with nearby regional faults could result in settlement, expansion, and/or subsidence of soils in the project site. The Draft EIR will evaluate potential impacts associated with expansive soils and will identify feasible mitigation measures (if necessary).

## e. Septic Tanks or Alternative Wastewater Disposal Systems

The project does not include the use of septic tanks or alternative wastewater disposal systems, and as such, no impact would occur, and this topic will not be further discussed in the Draft EIR.

## f. Paleontological Resources

The project site is located in the San Diego River corridor, which is partially underlain by young alluvial floodplain deposits (Holocene and late Pleistocene) (USGS 2023). Because of their young age, such deposits are assigned low paleontological resource sensitivity (City of San Diego 2007). However, there are notable local examples where paleontological resources have been discovered in the alluvial deposits of riverine areas, including the teeth and limb bones of a mammoth discovered in the floodplain alluvial deposits of the Tijuana River Valley (City of San Diego 2007). As project construction would involve excavation and other ground-disturbing activities, the potential to

encounter and destroy paleontological resources (although low) still exists at the project site. As such, the Draft EIR will evaluate potential impacts associated paleontological resources and will identify feasible mitigation measures (if necessary).

### 3.8 Greenhouse Gas Emissions

	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
<b>VIII. GREENHOUSE GAS EMISSIONS – Would the project:</b>				
a) Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b) Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

#### a. Greenhouse Gas Emissions

Project construction activities would generate greenhouse gas (GHG) emissions through use of construction equipment and worker trips to and from the project site. Operation of the proposed projects would generate GHG emissions associated with a new vehicular route across the San Diego River. Consistent with CEQA Guidelines Section 15064.4, the Draft EIR will describe, calculate, and/or estimate the amount of GHG emissions associated with the project. The Draft EIR will identify GHG emission sources, and feasible mitigation measures will be identified (if necessary).

#### b. Applicable Plans, Policies, or Regulations

As discussed above, project construction and operation would generate GHG emissions. The Draft EIR will analyze the project’s potential to conflict with applicable plans, policies, or regulations adopted for the purpose of reducing GHG emissions. If there is a potential for significant impacts to occur, feasible mitigation measures will be identified.

### 3.9 Hazards and Hazardous Materials

	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
<b>IX. HAZARDS AND HAZARDOUS MATERIALS – Would the project:</b>				
a) Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
b) Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c) Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d) Be located on a site that is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
e) For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard or excessive noise for people residing or working in the project area?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
f) Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
g) Expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

**a. Routine Transport, Use, or Disposal of Hazardous Materials**

Project construction activities would likely involve the temporary storage, use, and transport of hazardous materials (e.g., asphalt, fuels, lubricants, paint, solvents, cleaners), which could potentially create a significant hazard to the public. As such, the Draft EIR will evaluate potential impacts related to the routine transport, use, and/or disposal of hazardous materials and will identify mitigation measures (if necessary).

**b. Accident or Upset Conditions Involving Hazardous Materials Release**

Construction activities at the project site could potentially encounter contaminated soils and result in the accidental release of hazardous materials to the environment. Further, construction activities would likely involve the temporary storage, use, and transport of hazardous materials (i.e., fuels, equipment, etc.). As such, The Draft EIR will evaluate the potential for project activities to create a significant hazard through upset and accident conditions involving the release of hazardous materials into the environment. The Draft EIR will identify mitigation measures (if necessary).

### **c. Hazards within 0.25 Miles of Schools**

Audeo Charter School is approximately 0.35 miles east from the project site. No other schools are located within 0.25 miles of the project site. As such, no impacts related to hazard emissions within 0.25 miles of an existing or planned schools would occur, and this topic will not be further discussed in the Draft EIR.

### **d. Hazardous Materials Sites Pursuant to Section 65962.5**

The State Water Resources Control Board (SWRCB) GeoTracker database does not identify any cleanup or leaking underground storage tank sites on or within a 0.5-mile radius of the project site. However, one active cleanup site under assessment for remedial action of contaminated groundwater, is directly outside of the 0.5-mile radius, located within the Mission Valley stadium (SWRCB 2023). As of January 29th, 2021, contaminated groundwater remediation has been completed and requests by the San Diego Regional Water Quality Control Board (RWQCB) for additional assessment have been fulfilled through a Supplemental Groundwater Monitoring Report, which includes a request for No Further Action, and was concurred by the RWQCB on May 7th, 2021 (SDSU, pers comm., 2023). According to the Department of Toxic Substances Control (DTSC) EnviroStor database, no hazardous waste sites are present on or within a 0.5-mile radius of the project site (DTSC 2023). As such, the project site is not included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 (CalEPA 2023). No impacts related to hazardous material sites would occur, and this topic will not be further discussed in the Draft EIR.

### **e. Safety Hazards or Excessive Noise within Two Miles of a Public Airport or Public Use Airport**

The nearest airports to the project site are the Montgomery Field Airport, located approximately 2.5 miles north, and the San Diego International Airport, located approximately 4.5 miles southwest. The project site is not within an airport land use plan or within the identified safety boundaries for either of these airports (San Diego County 2023). As such, implementation of the project is not expected to result in any safety hazards or excessive noise resulting from proximity to an airport, nor is it considered a noise-sensitive use. No impact would occur, and this topic will not be further discussed in the Draft EIR.

### **f. Emergency Response or Evacuation Plans**

The project involves construction and operation of a new vehicular, bicycle, and pedestrian roadway connection in the Mission Valley area. Because the project would result in a new access/connection point to areas north and south of the San Diego River corridor, the potential to impair or interfere with implementation of an emergency response or evacuation plan will be further discussed in the Draft EIR. The Draft EIR will provide mitigation measures (if necessary).

### **g. Wildland Fires**

The project site and surrounding area is located in a Very High Fire Hazard Severity Zone within the local responsibility area (LRA) (CAL FIRE 2023). As such, the project's potential to expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires will be further evaluated in the EIR. The Draft EIR will provide mitigation measures (if necessary).

### 3.10 Hydrology and Water Quality

	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
<b>X. HYDROLOGY AND WATER QUALITY – Would the project:</b>				
a) Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b) Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would:				
i) result in substantial erosion or siltation on- or off-site;	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
ii) substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off site;	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
iii) create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff; or	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
iv) impede or redirect flood flows?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
d) In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
e) Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

#### a. Surface and Groundwater Quality

Short-term construction activities associated with the proposed project could affect the quality of stormwater discharged from the project site as well as existing groundwater quality. Land disturbing activities could result in erosion and sedimentation as well as spills or leaks of petroleum products used by construction equipment that could also affect the quality of stormwater and/or groundwater. The project area is underlain by the Mission Valley Groundwater Basin, and nearby groundwater depth measurements suggest groundwater may be encountered at a

depth of approximately 18 feet below ground level (DWR 2004, 2023; RWQCB 2023). Site preparation and drilling for the bridge piles/support columns would have the potential to encounter and impact underlying groundwater. Even if groundwater (or perched groundwater) is not encountered, dewatering would be required in the site's riverine and riparian areas to facilitate site preparation and bridge construction, including fortification of the embankment. Once operational, no water quality deterioration or interference with groundwater supply would occur. However, further analysis is required to assess the potential effects of the proposed project related to surface and groundwater. A hydraulic analysis will be prepared for the EIR that will evaluate the impacts of the project on water quality and sediment. The Draft EIR will evaluate potential impacts associated with surface water and groundwater quality and identify feasible mitigation measures (if necessary).

## **b. Groundwater Supplies and Recharge**

As discussed above, the project area is underlain by the Mission Valley Groundwater Basin. Site preparation and drilling for the piles/support columns would have the potential to encounter and impact underlying groundwater. Even if groundwater (or perched groundwater) is not encountered, dewatering would be required on the site's riverine and riparian areas to facilitate site preparation and bridge construction, including fortification of the embankment. Once operational, no interference with groundwater supply would occur. However, further analysis is required to assess the potential effects of the proposed project related to groundwater. The Draft EIR will evaluate impacts associated with groundwater supply and recharge and identify feasible mitigation measures (if necessary).

## **c. Alteration to Existing Drainage Patterns**

The project would alter the existing drainage of the project site through introduction of the new impervious surfaces (i.e., the proposed bridge and associated infrastructure) within the San Diego River. Potential impacts resulting from alteration of the existing drainage conditions are discussed below.

### **i) Erosion or Siltation**

Given the riverine/riparian and sloped embankment conditions on and adjacent to the project site, soils loosened during excavation and grading could be mobilized via the river's seasonal flow and result in erosion, siltation, surface runoff. The potential for adverse impacts regarding erosion, siltation, and runoff would be compounded if construction activities were to occur during the rainy season or during a storm event. Once operational, no substantial erosion or siltation is anticipated. However, further analysis is required to assess the potential effects of the proposed project. A hydraulic analysis will be prepared for the EIR that will evaluate the potential impacts of proposed drainage conditions. The Draft EIR will evaluate potential impacts associated with erosion and/or siltation and identify feasible mitigation measures (if necessary).

### **ii) Surface Runoff and Flooding**

The project site is within a Special Flood Hazard Area, specifically Zone AE, which is considered a "high-risk" flood zone area with at least a 1% annual chance of flood water inundation (FEMA 2023; SANDAG 2023). Implementation of the project would alter the existing drainage of the project site through introduction of the new impervious surfaces and could alter seasonal flows, potentially resulting in on- or off-site flooding. The potential for adverse impacts regarding flooding would be compounded if construction activities were to occur during the rainy season or during a storm event. A hydraulic analysis will be prepared for the EIR that will evaluate potential impacts of proposed drainage conditions. The Draft EIR will evaluate potential impacts associated with runoff and flooding and identify feasible mitigation measures (if necessary).



### iii) Runoff and Exceedance of Stormwater Drainage System Capacity

As described above, short-term construction activities of the proposed project could affect the quality of stormwater discharged from the project site. Land-disturbing activities could result in erosion and sedimentation as well as spills or leaks of petroleum products used by construction equipment that could affect the quality of stormwater.

Implementation of the project would alter the existing drainage of the project site through introduction of the new impervious surfaces (i.e., the proposed bridge and associated infrastructure) within the San Diego River. Further, given the riverine/riparian and sloped embankment conditions on and adjacent to the project site, soils loosened during excavation and grading could be mobilized via the river's seasonal flow and result in erosion, siltation, surface runoff, and/or flooding, on or off site. The potential for adverse impacts regarding erosion, siltation, or flooding would be compounded if construction activities were to occur during the rainy season or during a storm event. Once operational, no polluted runoff or exceedance of existing or planned stormwater drainage system capacity is expected. However, further analysis is required to assess the potential effects of the proposed project related to stormwater runoff. A hydraulic analysis will be prepared for the EIR that will evaluate existing and proposed drainage conditions. The Draft EIR will evaluate impacts associated with runoff and affected stormwater drainage systems and will identify feasible mitigation measures (if necessary).

### iv) Flood Flows

As discussed above, the project site is within a Special Flood Hazard Area (FEMA 2023; SANDAG 2023). Construction activities and proposed land alterations would affect the existing drainage of the project site and could potentially affect seasonal flood flow. The potential for adverse flood flow impacts to occur would be compounded if construction activities were to occur during the rainy season or during a storm event. As such, the Draft EIR will evaluate potential impacts associated with flood flows and identify feasible mitigation measures (if necessary).

### d. Flood Hazard, Tsunami, or Seiche Zones

The project area exhibits a low potential for inundation by seiche, tsunami, or mudflow because it is approximately 7 miles east of the Pacific Ocean. However, the project site is within a Special Flood Hazard Area, specifically Zone AE, which is considered a "high-risk" flood zone area (FEMA 2023; SANDAG 2023). The potential for adverse impacts regarding flooding would be compounded if construction activities were to occur during the rainy season or during a storm event. The Draft EIR will evaluate potential impacts related to flood hazards and identify feasible mitigation measures (if necessary).

### e. Conflict With or Obstruct a Water Quality Control or Sustainable Groundwater Management Plans

Short-term construction activities of the proposed project could affect the quality of stormwater discharged from the project site as well as existing groundwater quality. Land-disturbing activities could result in erosion and sedimentation as well as spills or leaks of petroleum products used by construction equipment that could also affect the quality of stormwater. Site preparation and drilling for the piles/support columns would have the potential to encounter and impact underlying groundwater. Once operational, no water quality deterioration or interference with groundwater supply is anticipated. However, further analysis is required to assess the potential effects of the proposed project related to surface and groundwater. A hydraulic analysis will be prepared for the EIR that will evaluate the impacts of the project on water quality and sediment. The Draft EIR will evaluate potential impacts

associated with implementation of a water quality control plan or sustainable groundwater management plan. The Draft EIR will identify feasible mitigation measures (as appropriate).

### 3.11 Land Use and Planning

	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
<b>XI. LAND USE AND PLANNING – Would the project:</b>				
a) Physically divide an established community?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

#### a. Division of an Established Community

The project involves construction and operation of a bridge that would connect areas of north and south of the San Diego River corridor. Thus, development of the proposed project is not expected to physically divide an established community, and this issue will not be further discussed in the Draft EIR.

#### b. Applicable Land Use Plans, Policies, or Regulations

As previously discussed, the project site is designated as Open Space/Parks, Recreation, and Undeveloped (SANDAG 2023). The project site is zoned as Open Space-Floodplain (OF-1-1), Employment Mixed-Use (EMX-2), Residential Single Unit (RS-1-14), (City of San Diego 2021a).

The Mission Valley Specific Plan designates the project site as “San Diego River Subdistrict CPIOZ.” The designation includes regulations to ensure that development along the San Diego River implements the San Diego River Park Master Plan. The River Subdistrict regulations have been designed to preserve and enhance the character of the San Diego River Valley, to provide for sensitive rehabilitation and redevelopment, and to create the San Diego River Pathway. The San Diego River Subdistrict CPIOZ includes the River Corridor Area and the River Influence Area.

Surrounding uses include commercial and residential uses to the north, SDSU Mission Valley to the northeast, office and healthcare uses to the south, and open space, including the San Diego River. An applicable land use policy and guideline analysis will be prepared for the Draft EIR, taking into consideration the CSU’s state agency status. The proposed project is located within the boundary of the City of San Diego’s MHPA, which includes the MSCP. As such, the MSCP Subarea Plan will be considered as part of the site-specific Biological Resources Technical Report, the results of which will be disclosed in the Draft EIR. The Draft EIR will also evaluate the project’s potential conflict(s) with any land use plan, policy, or regulation, and identify feasible mitigation measures (if necessary).

### 3.12 Mineral Resources

	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
<b>XII. MINERAL RESOURCES</b> – Would the project:				
a) Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Result in the loss of availability of a locally important mineral resource recovery site delineated on a local general plan, specific plan or other land use plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

#### a. Loss of Known Mineral Resources

The project site and vicinity are underlain by Portland Cement Concrete-grade aggregate, which is considered a locally important mineral resource. According to the DOC, Mineral Lands Classification Mapping, the project site is within a Mineral Resource Zone (MRZ)-2 mapped area, which is defined as “areas where geologic information indicate[s] that significant measured or indicated Portland Cement Concrete-grade aggregate resources are present” (DOC 2017). The project would involve construction and operation of a new connecting bridge that spans the San Diego River north-south. The project would not include extraction of known mineral resources, including Portland Cement Concrete-grade aggregate, within the project site. As such, impacts related to the loss of a known mineral resource would be considered less than significant; this topic will not be further discussed in the Draft EIR.

#### b. Loss of Locally Important Mineral Resource Recovery Sites

As noted above, the project site is within an MRZ-2 mapped area. According to the City of San Diego General Plan, Portland Cement Concrete aggregate is the scarcest aggregate resource in San Diego County due to the restrictive specifications for that material. Those deposits that meet the specifications for Portland Cement Concrete are considered high value and of most concern in planning future availability (City of San Diego 2008). However, there are no existing or planned mining operations on the project site or surrounding area. The project would not include extraction of locally important mineral resources within the project site or a mineral resource recovery site, nor would the construction of the bridge preclude any future extraction should the City deem such activity appropriate as the landowner and regulatory authority involved in this area of the San Diego River. As such, impacts related to the loss of a locally important mineral resource recovery site would be considered less than significant; this topic will not be further discussed in the Draft EIR.

### 3.13 Noise

	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
<b>XIII. NOISE – Would the project result in:</b>				
a) Generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b) Generation of excessive groundborne vibration or groundborne noise levels?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c) For a project located within the vicinity of a private airstrip or an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

#### a. Generation of Ambient Noise Levels

Potential increases in existing noise levels would be introduced through temporary construction and then operation of the new bridge. Construction activities would occur over an approximate 14-month period. Further, construction of the project could result in generation of excessive groundborne vibration or groundborne noise levels in excess of applicable standards. Once operational, the proposed project would result in additional sources of noise from vehicular traffic.

A noise analysis will be conducted to inform the noise section of the Draft EIR and will evaluate the effects of bridge construction activities, as well as altered traffic on nearby sensitive receptors, and will document any substantial increases to existing ambient or community noise equivalent levels that would occur. The Draft EIR will evaluate whether implementation of the proposed project would expose people to a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project (in excess of standards established in the local general plan, noise ordinance, or other standards). The Draft EIR will identify feasible mitigation measures (if necessary).

#### b. Groundborne Vibration

Construction of the project could result in generation of excessive groundborne vibration or groundborne noise levels in excess of applicable standards. A noise analysis will be conducted to inform the noise section of the Draft EIR and will evaluate the effects of bridge construction activities on nearby sensitive receptors. The Draft EIR will analyze any temporary or permanent increase in groundborne noise levels generated from construction and/or operational activities and identify feasible mitigation measures (if necessary).

**c. Airports, Airstrips, or Airport Land Use Plans**

As discussed in Section 3.9, Hazards and Hazardous Materials, the nearest airports to the project site are Montgomery Field Airport, located approximately 2.5 miles north, and the San Diego International Airport, located approximately 4.5 miles southwest. The project site is not within an airport land use plan for either of these airports. As such, no impacts related to excessive noise levels from nearby airports are anticipated as a result of project implementation. This topic will not be further discussed in the Draft EIR.

### 3.14 Population and Housing

	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
<b>XIV. POPULATION AND HOUSING – Would the project:</b>				
a) Induce substantial unplanned population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

**a. Substantial Unplanned Population Growth**

The project, which consists of a bridge and associated roadway, pedestrian, and bikeway improvements, would not facilitate any additional housing or other development types (i.e., permanent, employment-generating uses) that would directly facilitate new population growth in the area. Project construction activities would employ available workers who live either in the area or the greater San Diego region and would commute to the project site for the duration of the site preparation and construction phase. Commuting out-of-area workers would not be anticipated to permanently relocate to the project area or surrounding communities. Therefore, there is no potential for the project to induce direct substantial unplanned population growth.

The proposed bridge and associated multimodal transportation improvements would facilitate a connection between uses on the north and south sides of the San Diego River. The project is intended to benefit a variety of users by offering multimodal use (i.e., vehicular, bike, and pedestrian) of the new bridge connection; serving as an additional access route for stadium events, nearby existing and proposed residential, commercial, and business uses; and enhancing overall emergency access. The bridge is referenced in the Mission Valley Community Plan (adopted in 2019) and has been a long-sought infrastructure enhancement in the Mission Valley Community (City of San Diego 2019). The proposed bridge and roadway would facilitate movement of people and goods within the confines of an established community and would not extend the roadway to encourage travel to a previously undeveloped area. Therefore, potential project impacts regarding direct or indirect unplanned population growth would be less than significant, and no mitigation is required. This issue will not be analyzed further the EIR.

**b. Displacement of People or Housing**

The project site consists of portions of existing roadways, a vacant lot used for stadium event parking and equipment storage, ruderal areas, and undisturbed river/riparian areas. There is no existing housing or other habitable structure on the project site. As such, there is no potential for construction or operation of the project to displace existing people or housing. No impact would occur, and this issue will not be analyzed further in the EIR.

**3.15 Public Services**

	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
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**XV. PUBLIC SERVICES – Would the project:**

a) Result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times, or other performance objectives for any of the public services:

Fire protection?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Police protection?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Schools?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Parks?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Other public facilities?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

**a. Substantial Adverse Physical Impacts Associated with the Provision of or Need for New or Physically Altered Governmental Facilities, the Construction of Which Could Cause Significant Environmental Impacts**

**i) Fire Protection**

The project site is within the existing service area of the City of San Diego Fire-Rescue Department (FRD) (City of San Diego 2023b). More specifically, the project site is within the primary service district of Engine 45 based out of FRD Fire Station 45 (City of San Diego 2023b). Fire Station 45 is located at 9366 Friars Road, 0.6 miles northwest of the Fenton Parkway/Northside Drive intersection (City of San Diego 2023b). The Engine 45’s 4.28-square mile district consists of West Mission Valley, including areas both north and south of I-8 and the San Diego River corridor (City of San Diego 2023b). The project site is located within a Very High Fire Hazard Severity Zone and Special Flood Hazard Zone (City of San Diego 2023a; CAL FIRE 2023). Between I-15 and I-805, there is currently no existing roadway infrastructure providing direct north-south access from Camino Del Rio North to uses on the north side of the San Diego River. The proposed project would connect the southern terminus of Fenton Parkway to the northern terminus of Camino Del Rio North/Mission City Parkway. The new bridge would include a 10-foot center lane that would provide an optional additional traffic lane during stadium or emergency events. Therefore, the project could potentially improve acceptable response times for local fire service provision.

Project design and construction would comply with all required building, fire, and safety code standards (e.g., Titles 19 and 24 of the California Code of Regulations and the California Health and Safety Code). Further, the project

would not generate any new residences or businesses, which is generally the driving factor for increased or expanded fire protection services. As discussed in Section 3.14, Population and Housing, the project would enhance connectivity within the confines of an existing, developed community and would not induce population growth, expand the service area of the FRD, or indirectly result in new demand for fire protection services.

Furthermore, it is not anticipated that road closures would be necessary for the project. Existing travel lanes on Camino Del Rio North may be shifted or narrowed to accommodate bridge construction and replacement/relocation of traffic signal poles, curb, gutter, and sidewalk. Most of the construction activity would occur outside of existing roadways. However, lane closures to complete the traffic signal and striping adjustments at Camino Del Rio North at Mission City Parkway are anticipated. As described in Section 2, Project Description, temporary traffic control measures (e.g., lane closures, signage) would be incorporated around the construction laydown/staging areas. For areas along Fenton Parkway that are outside existing roadways, advance signs notifying vehicles of approaching work zones may be installed. Temporary traffic control measures would also be implemented for the intersection modifications at Camino Del Rio North and Mission City Parkway. These measures would ensure that FRD emergency response and fire service vehicles are appropriately routed and continue to have safe and effective access to the project site vicinity during temporary project construction. For these reasons, the project would not result in substantial adverse physical impacts associated with the provision of new or physically altered FRD facilities in order to maintain acceptable service ratios, response times, or other performance objectives. Project impacts would be less than significant, and no mitigation is required. This issue will not be further evaluated in the EIR.

## ii) Police Protection

The project site is within the existing service area for the San Diego Police Department Eastern Division (City of San Diego 2023c). The Eastern Division police station is located at 9225 Aero Drive, approximately 2 miles north of the project site. The Eastern Division service area extends south from State Route 52 to include east Mission Valley as well as areas south of I-8, including the College Area east of I-15 (City of San Diego 2023c). During construction, security measures such as perimeter/safety fencing and lighting would be implemented at the project site. As discussed above, traffic control measures implemented during temporary construction activities in the public right-of-way would ensure that police vehicles are appropriately routed in the event of temporary lane closures and continue to have safe and effective access to the project vicinity.

The project design and construction would comply with all applicable building, fire, and safety codes (e.g., City and County of San Diego, Caltrans, Titles 19 and 24 of the California Code of Regulations, California Health and Safety Code, and the American Association of State Highway and Transportation Officials guidelines). Project features would include safety barriers, roadway/pedestrian lighting, and metal railings along the length of the bridge. Traffic signals would comply with all applicable safety standards, including the California Manual on Uniform Traffic Control Devices. Because the Eastern Division serves areas both north and south of the San Diego River corridor, the project would improve access for police responders, which would help maintain acceptable response times. As discussed above under Section 3.14, the project would enhance connectivity within the confines of an existing, developed community and would not have the potential to directly or indirectly induce population growth or expand the service area of the San Diego Police Department. For these reasons, the project would not result in substantial adverse physical impacts associated with the provision of new or physically altered San Diego Police Department facilities in order to maintain acceptable service ratios, response times, or other performance objectives. Project impacts would be less than significant, and no mitigation is required. This issue will not be further evaluated in the EIR.

### iii) Schools

The project site is adjacent and to the southwest of SDSU Mission Valley . As described in Section 3.9, Hazards and Hazardous Materials, Audeo Charter School is approximately 0.35 miles east from the project site. No other schools are located within 0.25 miles of the project site. The project site is also within the San Diego Unified School District; however, there are no school district facilities near (i.e., within 0.25 miles of) the project site (SDUSD 2023). As discussed above under Section 3.14, Population and Housing, the project would not develop any habitable structures or otherwise directly/indirectly result in population growth. As such, there is no potential for project operation to adversely affect service ratios or other performance objectives for schools. Rather, by facilitating connectivity between the commercial retail developments and SDSU Mission Valley on the north side of the San Diego River to office and residential districts located on the south side of the river, the project would improve access and mobility conditions for a public-school facility (i.e., SDSU Mission Valley ). Traffic control measures to address temporary construction impacts at Camino Del Rio North/Mission City Parkway and Fenton Parkway would ensure access is maintained for travelers to and from SDSU or Audeo Charter School (located approximately 0.35 miles east from the project site). For these reasons, the project would not result in substantial adverse physical impacts associated with the provision of new or physically altered school facilities in order to maintain acceptable service ratios or other performance objectives. Project impacts would be less than significant, and no mitigation is required. This issue will not be further evaluated in the EIR.

### iv) Parks

The proposed bridge would span the San Diego River and open space corridor, which currently supports a disconnected series of more formal parks and pathways. Further, SDSU is currently in the process of constructing the River Park on City-owned land that will be available for use by the general public, located adjacent to the proposed bridge. Although there is currently no means of access (e.g., trails or other pathways) to the riverbed or habitat areas on or adjacent to the project site, the adopted Mission Valley Community Plan envisions a completed San Diego River Pathway that will “...join with green streets that have enriched pedestrian spaces including linear parks and nodes of pedestrian-scale, visually stimulating developments that contain restaurants, retail, offices, and residences” (City of San Diego 2019). The proposed bridge is identified in the Mission Valley Community Plan as helping to provide a safe and reliable means of transportation for visitors, employees, and residents to explore the San Diego River riparian habitat, passive recreation opportunities, and “urban oasis” of Mission Valley (City of San Diego 2019). As discussed above, the project would not develop any habitable structures or directly/indirectly result in population growth. As such, there is no potential for project operation to adversely affect service ratios or other performance objectives for existing parks. Rather, the proposed project would facilitate access to and enjoyment of the existing San Diego River and open space areas while also supporting a broader vision for increasing park space and access to parks/open space in Mission Valley. For these reasons, the project would not result in substantial adverse physical impacts associated with the provision of new or physically altered park facilities in order to maintain acceptable service ratios or other performance objectives. Project impacts would be less than significant, and no mitigation is required. This issue will not be further evaluated in the EIR.

### v) Other Public Facilities

The Mission Valley Branch of the City of San Diego Public Library (2123 Fenton Parkway) is located on the corner of Northside Drive and Fenton Parkway adjacent to and north of the project site. As discussed above under Section 3.14, the project would not result in the development of any habitable structures or otherwise directly/indirectly result in population growth. As such, there is no potential for project operation to adversely affect service ratios or other performance objectives for other public services, such as libraries. Regarding potential project construction



impacts, temporary traffic control measures (e.g., lane closures, signage) would be incorporated around identified construction laydown/staging areas, including within the park area west of Fenton Bridge Parkway and south River Park Road and SDSU Mission Valley . For areas along Fenton Parkway that are outside existing roadways, advance signs notifying vehicles of approaching work zones may be installed. These measures would ensure that library visitors and employees are appropriately routed during temporary construction activities and continue to have safe and effective access to library facilities and services. For these reasons, the project would not result in substantial adverse physical impacts associated with the provision of new or physically altered library facilities in order to maintain acceptable service ratios or other performance objectives. Project impacts would be less than significant, and no mitigation is required. This issue will not be further evaluated in the EIR.

### 3.16 Recreation

	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
<b>XVI. RECREATION</b>				
a) Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Does the project include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

#### a. Existing Parks and Recreational Facilities

The City’s parks system consists of over 42,000 acres of assets, including parks, trails, and conserved open spaces, managed by the Parks and Recreation Department (City of San Diego 2021b). In the past, the City set a standard of 2.8 acres per 1,000 residents for parks, including community parks, neighborhood parks, mini-parks, and joint use facilities (City of San Diego 2021b). While some communities run a deficit of these parks, “the City overall remains rich in large resource-based spaces and has one of the largest inventories of land per capita among major cities in the United States” (City of San Diego 2021b). When counting all types of developed parkland, including regional parks, the City’s park acres per capita is about 6 acres per 1,000 population (City of San Diego 2021b).

As discussed above under Section 3.15, Public Services, the proposed bridge would span the San Diego River and open space corridor, which currently supports a disconnected series of more formal parks and pathways. Although there is currently no means of access (e.g., trails or other pathways) to the riverbed or habitat areas on or adjacent to the project site, the proposed bridge is identified in the Mission Valley Community Plan as helping to provide a safe and reliable means of transportation for visitors, employees, and residents to explore the San Diego River and passive recreation opportunities in Mission Valley (City of San Diego 2019). The project would not result in the development of any habitable structures or directly/indirectly result in population growth. The proposed project would facilitate access to and enjoyment of the existing San Diego River and open space areas while also supporting

a broader vision for increasing park space and access to parks/open space in Mission Valley. As discussed above, at 6 acres of parkland 1,000 residents, the City currently exceeds its target ratio of 2.8 acres of per 1,000 residents, and the project’s incremental facilitation of access to recreational opportunities (such as the existing and planned San Diego River Pathway, San Diego River Park, etc.) would not be anticipated to exacerbate physical deterioration of these areas. For these reasons, the project would not increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of facilities would occur or be accelerated. Impacts to parks and recreational facilities would be less than significant, and no mitigation is required. This topic will not be further discussed in the Draft EIR.

**b. Construction or Expansion of Recreational Facilities**

The proposed project would facilitate access to and enjoyment of the existing San Diego River and open space areas while also supporting a broader vision for increasing park space and access to parks/open space in Mission Valley. The project does not include construction or expansion of any existing recreational facilities. Furthermore, the project would not result in any increased population growth and would not require the construction or expansion of recreational facilities, which might have an adverse physical effect on the environment. As such, impacts related to recreational facilities would be less than significant, and no mitigation is required. This topic will not be further discussed in the Draft EIR.

### 3.17 Transportation

	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
<b>XVII. TRANSPORTATION – Would the project:</b>				
a) Conflict with a program, plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b) Conflict or be inconsistent with CEQA Guidelines Section 15064.3, subdivision (b)?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c) Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
d) Result in inadequate emergency access?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

**a. Conflicts with Programs, Plans, Ordinances, and Policies**

Project-generated traffic during construction would include worker-related commuter trips, trucks used for delivering construction equipment, and trucks used for delivering and hauling construction materials and wastes. The bridge would connect the southern terminus of Fenton Parkway to the northern terminus of Camino Del Rio North/Mission City Parkway. Because no previous north-south-trending access exists over the San Diego River in the corridor area between I-8 and I-15, this new connectivity could redistribute traffic patterns in the project area.

Further analysis is required to determine whether traffic-flow patterns resulting from project implementation have the potential to conflict with existing plans, policies, or ordinances. As such, the Draft EIR will analyze potential conflicts with applicable plans and policies addressing the circulation system and provide mitigation measures (if necessary). A transportation impact study will also be prepared to inform the Draft EIR analysis.

#### **b. CEQA Guidelines Section 15064.3, Subdivision (b)**

As noted above, project construction would generate new vehicle trips during the approximate 14-month construction period, while operation of the proposed bridge would redistribute traffic patterns in the project area. Per CEQA Guidelines Section 15064.3(a), vehicle miles traveled (VMT) is generally the most appropriate measure of transportation impacts. However, CEQA Guidelines Section 15064.3(b)(2) states that “[f]or roadway capacity projects, agencies have discretion to determine the appropriate measure of transportation impact consistent with CEQA and other applicable requirements.” Further analysis is required to determine the most appropriate measure of the project’s transportation impacts consistent with CEQA, and whether the project would have the potential to exceed any applicable thresholds (e.g., VMT). A transportation impact study will be prepared, and the results of the study will be further discussed in the Draft EIR. The Draft EIR will also include mitigation measures (if necessary) to reduce any potentially significant transportation impacts.

#### **c. Roadway Hazards or Incompatible Uses**

The new bridge would include two through-traffic lanes and a center lane that would be used for left turn movements onto Camino Del Rio North. Additionally, off-site impacts related to the provision of a new north-south-trending roadway/access point connecting Fenton Parkway to the Camino Del Rio North/Mission City Parkway may occur. The proposed project would also increase pedestrian and bicycle activity in the area. The proposed project does not include any incompatible uses, such as farm equipment; however, further analysis is required to determine if the proposed bridge and roadway design features would substantially increase hazards. As such, this issue will be addressed in the Draft EIR with mitigation measures provided (if necessary) to reduce or avoid any potentially significant transportation impacts.

#### **d. Emergency Access**

There is currently no existing roadway infrastructure between I-15 and I-805 providing direct north-south access from Camino Del Rio North to roadways/communities on the north side of the San Diego River. The proposed project would connect the southern terminus of Fenton Parkway to the northern terminus of Camino Del Rio North/Mission City Parkway. The center lane of the proposed bridge would provide an optional additional traffic lane during stadium or emergency events. However, because the project would increase roadway connectivity in a Very High Fire Hazard Severity Zone and Special Flood Hazard Zone, this topic will be further analyzed in the Draft EIR. Feasible mitigation measures will be identified (if necessary),

### 3.18 Tribal Cultural Resources

	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
<b>XVIII. TRIBAL CULTURAL RESOURCES</b>				
Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code Section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is:				
a) Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code Section 5020.1(k), or	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b) A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1? In applying the criteria set forth in subdivision (c) of Public Resources Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

**a. Substantial Adverse Change in the Significance of a Tribal Cultural Resource Listed or Eligible for Listing as Defined in Public Resources Code Section 5020.1(k) Historical Resources**

As described in Section 3.5, Cultural Resources, the City identifies the project site as being within a “Moderate” Cultural Sensitivity Area Overlay Zone (City of San Diego 2023a). Additionally, the project site includes undeveloped land that has not been subject to past site development or grading. As such, ground-disturbing activities associated with construction of the project, such as grading, drilling, and/or excavation to facilitate bridge columns, fill slopes, abutment footings, and concrete piles, have the potential to damage or destroy intact subsurface materials or deposits, which could be considered tribal cultural resources. The proposed project is subject to Assembly Bill 52 (AB 52) (California Public Resources Code 21074) requirements which involves lead agency notification to Tribes (that have previously requested such notification) to participate in consultation regarding the presence of any tribal cultural resources that may be present. As such, this impact will be further addressed in the Draft EIR and feasible mitigation measures will be identified (if necessary).

**b. Substantial Adverse Change in the Significance of a Tribal Cultural Resource Determined to be Significant Pursuant to Criteria Set Forth in Subdivision (c) of PRC Section 5024.1**

As discussed above, the project site is within a “Moderate” Cultural Sensitivity Area Overlay Zone, and ground-disturbing activities associated with project construction have the potential to damage or destroy intact subsurface materials or deposits, which could be considered tribal cultural resources. Further, the project is subject to

compliance with AB 52, which requires consideration of impacts to tribal cultural resources as part of the CEQA process. As part of the AB 52 process, SDSU will notify Tribal groups that are traditionally or culturally affiliated with the geographic area, and have previously requested notification, of the proposed project. The results of the AB 52 outreach and consultation process will be summarized in the EIR. In the event that potentially significant effects to tribal cultural resources are identified, such effects would be described (to the extent possible considering confidentiality requirements) in the Draft EIR. As such, the Draft EIR will further analyze this topic and identify feasible mitigation measures (if necessary).

### 3.19 Utilities and Service Systems

	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
<b>XIX. UTILITIES AND SERVICE SYSTEMS – Would the project:</b>				
a) Require or result in the relocation or construction of new or expanded water, waste water treatment or storm water drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b) Have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry, and multiple dry years?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c) Result in a determination by the waste water treatment provider which serves or may serve the project that it has adequate capacity to serve the project’s projected demand in addition to the provider’s existing commitments?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d) Generate solid waste in excess of state or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
e) Comply with federal, state, and local management and reduction statutes and regulations related to solid waste?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

#### a. Relocation or Construction of New Utility Infrastructure

While the project would not result in the provision and/or construction of new or expanded water supply, wastewater, natural gas, or telecommunication infrastructure, the project would include relocation of existing storm drains to accommodate proposed bridge abutment locations, as well as extension of electrical lines to power ancillary infrastructure, such as roadway lighting. As such, the project’s potential to result in environmental effects

associated with new or expanded utility infrastructure will be further analyzed in the Draft EIR. The Draft EIR will provide mitigation measures (if necessary) to reduce any potentially significant utility impacts.

### **b. Water Supply**

The project would not include any habitable structures or other land uses (e.g., residential, industrial, commercial) that are associated with a substantial increase in water use. Although some project-related water use would be required during construction as well as for ongoing roadway maintenance (e.g., street cleaning), water would be trucked onto the project site for these purposes and the project would not require any new water connections or expanded water service facilities. Water tanks for on-site construction activities such as dust control would be filled and operated by the project's designated construction personnel, while ongoing street cleaning operations would be conducted by the City, in accordance with the MOU. Water for construction and street cleaning activities would be drawn from the City's existing urban water supply, which consists of nine reservoirs that capture runoff from local watershed rainfall, three water treatment plants, and a small supply of local groundwater (City of San Diego 2021c).

The City's water systems are maintained and operated by the City Public Utilities Department (City of San Diego 2021c). The City, as its own urban water supplier, is required to prepare, adopt, and submit an Urban Water Management Plan (UWMP) to the California Department of Water Resources every 5 years (City of San Diego 2021c). The City's 2020 UWMP describes the City's service area, water demands and supplies, water conservation activities, and assess the reliability of water sources over a 20-year planning time frame. According to the 2020 UWMP and water supply reliability assessment, based on historic and anticipated water use in the City's service area, there are no anticipated water supply shortages through 2045 during normal, dry, or multiple dry years (City of San Diego 2021c). In light of this determination, and given that the project (1) is in an urban environment within the City's existing service area; (2) would not require any new water supply connections; and (3) would only require limited amounts of construction-related water use and occasional/sporadic water use for roadway maintenance, it is anticipated that the City would have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years. Therefore, project impacts related to water supply would be less than significant, and this topic will not be further addressed in the Draft EIR.

### **c. Wastewater Treatment Capacity**

Construction and operation of the project would not generate any demand for wastewater treatment or require new connections to the sanitary sewer system. Therefore, project impacts related to wastewater generation would be less than significant, and this topic will not be further addressed in the EIR.

### **d. Solid Waste Generation and Compliance**

While project implementation would not require demolition of any aboveground structures, excavated materials and other inert debris requiring export would be generated as a result of grading activities and demolition of portions of the existing roadways, a vacant lot used for stadium event parking and equipment storage, ruderal areas, and undisturbed river/riparian areas. The project's potential to result in environmental effects associated with generation of solid waste and compliance with regulations governing solid waste will be further analyzed in the Draft EIR. The Draft EIR will provide mitigation measures (if necessary).

### 3.20 Wildfire

	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
<b>XX. WILDFIRE</b> – If located in or near state responsibility areas or lands classified as very high fire hazard severity zones, would the project:				
a) Substantially impair an adopted emergency response plan or emergency evacuation plan?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b) Due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose project occupants to pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c) Require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
d) Expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

#### a. Emergency Response and Evacuation

As described in Section 3.9, Hazards and Hazardous Materials, the project site and surrounding area is located in a Very High Fire Hazard Severity Zone within the LRA (CAL FIRE 2023). Project construction activities may temporarily result in traffic controls along adjacent roadways, while long-term operation of the proposed bridge and associated travel lanes may affect local traffic patterns. As such, implementation of the project could have the potential to impair an adopted emergency response/evacuation. Therefore, potential impacts related to an adopted emergency response plan or emergency evacuation plan will be further evaluated in the Draft EIR, and mitigation measures will be presented (if necessary).

#### b. Exacerbate Wildfire Risks and Result in Exposure to Pollutants from Wildland Fire Conditions

The project site includes slopes and vegetated areas continuously exposed to prevailing winds and other ambient weather conditions. The project site and surrounding area are also located in a Very High Fire Hazard Severity Zone within the LRA. As such, implementation of the project could have the potential to exacerbate wildfire risks and thereby expose project occupants to pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire. Therefore, potential impacts related to exposure to pollutant concentrations from wildland fire conditions will be further evaluated in the Draft EIR, and mitigation measures will be presented (if necessary).

**c. Exacerbate Fire Risk through Installation or Maintenance of Infrastructure**

Because the project site and surrounding area is located within a Very High Fire Hazard Severity Zone, implementation of the project could have the potential to exacerbate wildfire risk through installation or maintenance of associated infrastructure (i.e., the proposed bridge). Therefore, potential impacts related to exacerbation of fire risk through installation or maintenance of infrastructure will be further evaluated in the Draft EIR, and mitigation measures will be presented (if necessary).

**d. Expose of People or Structures to Significant Risks Associated with Post-Fire Conditions**

As stated above, the project site includes sloped, riverine habitat within a Very High Fire Hazard Severity Zone. Further, as described in Section 3.10, Hydrology and Water Quality, the project site is located within Zone AE, which is considered a “high-risk” flood zone area. Additionally, as discussed in Section 3.10, the project would alter existing drainage patterns, which could have the potential to redirect seasonal flood flows. As such, implementation of the project could have the potential to expose people or structures to significant risks as a result of runoff, post-fire slope instability, or drainage changes. Therefore, impacts will be further evaluated in The Draft EIR, and mitigation measures will be presented (if necessary).

### 3.21 Mandatory Findings of Significance

	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
<b>XXI. MANDATORY FINDINGS OF SIGNIFICANCE</b>				
a) Does the project have the potential to substantially degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, substantially reduce the number or restrict the range of a rare or endangered plant or animal, or eliminate important examples of the major periods of California history or prehistory?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b) Does the project have impacts that are individually limited, but cumulatively considerable? (“Cumulatively considerable” means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects.)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c) Does the project have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>



**a. Substantially Degrade the Quality of the Environment**

Section 3.4, Biological Resources, indicates that the project could have the potential to result in adverse impacts to biological resources, including quality of the environment, habitats, wildlife populations, plant or animal communities, and/or rare or endangered plant and animal species. In addition, Section 3.5, Cultural Resources, identifies the potential to adversely affect historical and/or archaeological resources (including important examples of California history or prehistory), and Section 3.18, Tribal Cultural Resources, identifies the potential for effects on tribal cultural resources as a result of project implementation. As such, these topics will be further addressed in the Draft EIR. Mitigation measures will be identified (if necessary).

**b. Cumulatively Considerable Impacts**

As discussed throughout this Initial Study, implementation of the project could result in potentially significant impacts. Further, potentially significant impacts identified could be individually limited but cumulatively considerable. The Draft EIR will analyze past, present, and reasonably foreseeable projects in the vicinity of the project site. Mitigation measures will be identified (if necessary).

**c. Substantial Adverse Effects on Human Beings**

As discussed throughout this Initial Study, implementation of the project could result in environmental effects that could cause substantial adverse effects on human beings (i.e., construction air quality emissions). Therefore, these topics will be further addressed in the Draft EIR. Mitigation measures will be identified (if necessary).

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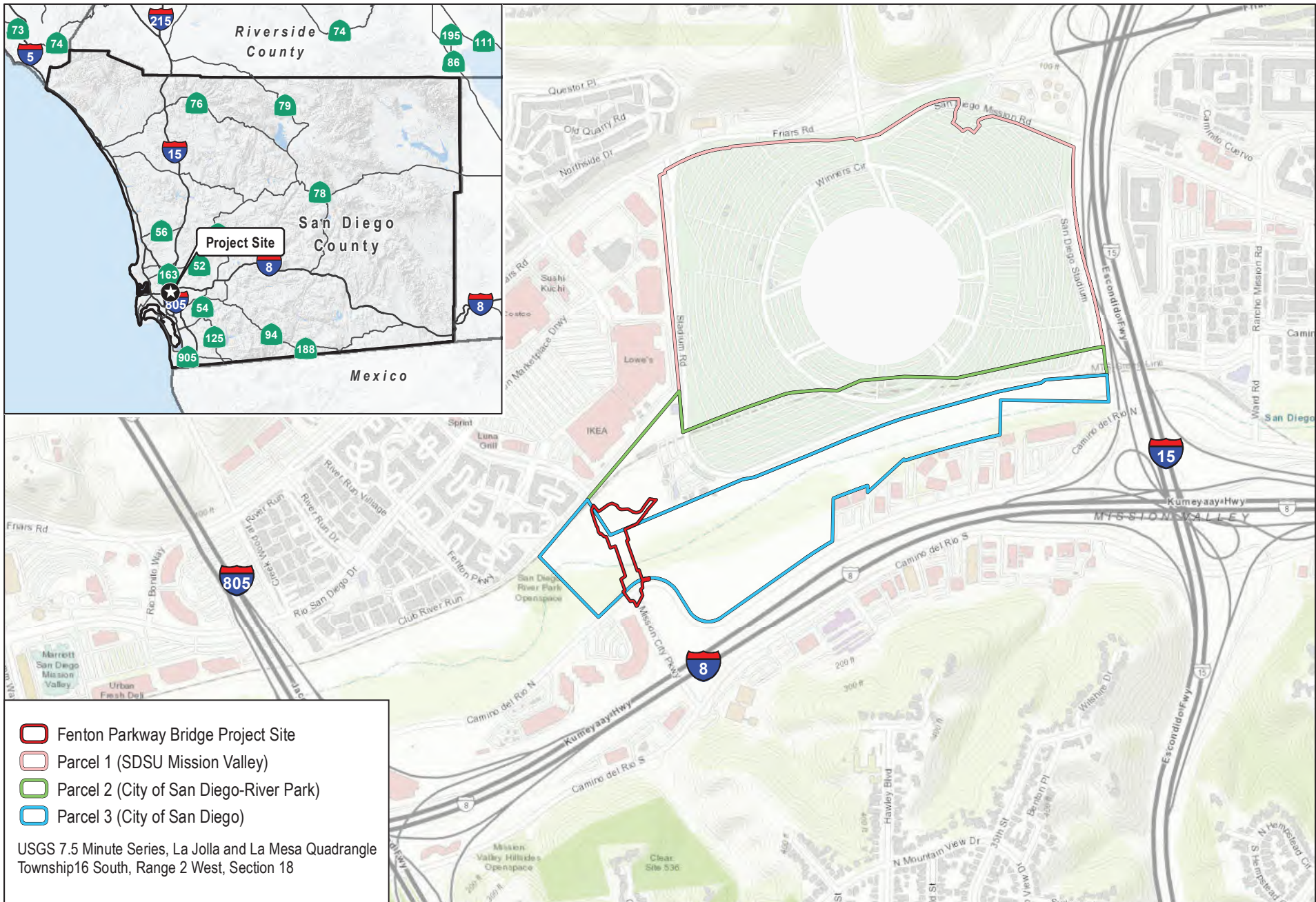
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### **Fehr and Peers**

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SOURCE: ESRI MAPPING SERVICE; BOWMAN/PDC 5/08/2023



**FIGURE 1**  
Project Vicinity and Location  
Fenton Parkway Bridge Project

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SOURCE: AERIAL-ESRI IMAGERY SERVICE; KLEINFELDER 2/8/2023  
 DEVELOPMENT-BOWMAN/PDC 5/08/2023; PARCELS-BOWMAN/PDC 3/27/2023

**FIGURE 2**  
**Project Site**

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## NATIVE AMERICAN HERITAGE COMMISSION

May 25, 2023

Anne Collins-Doehne  
Board of Trustees of the California State University  
401 Golden Shore  
Long Beach, CA 90802

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**Re: 2023050534, Fenton Parkway Bridge Project, San Diego County**

Dear Ms. Collins-Doehne:

The Native American Heritage Commission (NAHC) has received the Notice of Preparation (NOP), Draft Environmental Impact Report (DEIR) or Early Consultation for the project referenced above. The California Environmental Quality Act (CEQA) (Pub. Resources Code §21000 et seq.), specifically Public Resources Code §21084.1, states that a project that may cause a substantial adverse change in the significance of a historical resource, is a project that may have a significant effect on the environment. (Pub. Resources Code § 21084.1; Cal. Code Regs., tit.14, §15064.5 (b) (CEQA Guidelines §15064.5 (b)). If there is substantial evidence, in light of the whole record before a lead agency, that a project may have a significant effect on the environment, an Environmental Impact Report (EIR) shall be prepared. (Pub. Resources Code §21080 (d); Cal. Code Regs., tit. 14, § 5064 subd.(a)(1) (CEQA Guidelines §15064 (a)(1)). In order to determine whether a project will cause a substantial adverse change in the significance of a historical resource, a lead agency will need to determine whether there are historical resources within the area of potential effect (APE).

CEQA was amended significantly in 2014. Assembly Bill 52 (Gatto, Chapter 532, Statutes of 2014) (AB 52) amended CEQA to create a separate category of cultural resources, "tribal cultural resources" (Pub. Resources Code §21074) and provides that a project with an effect that may cause a substantial adverse change in the significance of a tribal cultural resource is a project that may have a significant effect on the environment. (Pub. Resources Code §21084.2). Public agencies shall, when feasible, avoid damaging effects to any tribal cultural resource. (Pub. Resources Code §21084.3 (a)). **AB 52 applies to any project for which a notice of preparation, a notice of negative declaration, or a mitigated negative declaration is filed on or after July 1, 2015.** If your project involves the adoption of or amendment to a general plan or a specific plan, or the designation or proposed designation of open space, on or after March 1, 2005, it may also be subject to Senate Bill 18 (Burton, Chapter 905, Statutes of 2004) (SB 18). **Both SB 18 and AB 52 have tribal consultation requirements.** If your project is also subject to the federal National Environmental Policy Act (42 U.S.C. § 4321 et seq.) (NEPA), the tribal consultation requirements of Section 106 of the National Historic Preservation Act of 1966 (154 U.S.C. 300101, 36 C.F.R. §800 et seq.) may also apply.

The NAHC recommends consultation with California Native American tribes that are traditionally and culturally affiliated with the geographic area of your proposed project as early as possible in order to avoid inadvertent discoveries of Native American human remains and best protect tribal cultural resources. Below is a brief summary of portions of AB 52 and SB 18 as well as the NAHC's recommendations for conducting cultural resources assessments.

**Consult your legal counsel about compliance with AB 52 and SB 18 as well as compliance with any other applicable laws.**

[AB 52](#)

AB 52 has added to CEQA the additional requirements listed below, along with many other requirements:

- 1. Fourteen Day Period to Provide Notice of Completion of an Application/Decision to Undertake a Project:** Within fourteen (14) days of determining that an application for a project is complete or of a decision by a public agency to undertake a project, a lead agency shall provide formal notification to a designated contact of, or tribal representative of, traditionally and culturally affiliated California Native American tribes that have requested notice, to be accomplished by at least one written notice that includes:

  - a. A brief description of the project.
  - b. The lead agency contact information.
  - c. Notification that the California Native American tribe has 30 days to request consultation. (Pub. Resources Code §21080.3.1 (d)).
  - d. A "California Native American tribe" is defined as a Native American tribe located in California that is on the contact list maintained by the NAHC for the purposes of Chapter 905 of Statutes of 2004 (SB 18). (Pub. Resources Code §21073).
- 2. Begin Consultation Within 30 Days of Receiving a Tribe's Request for Consultation and Before Releasing a Negative Declaration, Mitigated Negative Declaration, or Environmental Impact Report:** A lead agency shall begin the consultation process within 30 days of receiving a request for consultation from a California Native American tribe that is traditionally and culturally affiliated with the geographic area of the proposed project. (Pub. Resources Code §21080.3.1, subds. (d) and (e)) and prior to the release of a negative declaration, mitigated negative declaration or Environmental Impact Report. (Pub. Resources Code §21080.3.1(b)).

  - a. For purposes of AB 52, "consultation shall have the same meaning as provided in Gov. Code §65352.4 (SB 18). (Pub. Resources Code §21080.3.1 (b)).
- 3. Mandatory Topics of Consultation If Requested by a Tribe:** The following topics of consultation, if a tribe requests to discuss them, are mandatory topics of consultation:

  - a. Alternatives to the project.
  - b. Recommended mitigation measures.
  - c. Significant effects. (Pub. Resources Code §21080.3.2 (a)).
- 4. Discretionary Topics of Consultation:** The following topics are discretionary topics of consultation:

  - a. Type of environmental review necessary.
  - b. Significance of the tribal cultural resources.
  - c. Significance of the project's impacts on tribal cultural resources.
  - d. If necessary, project alternatives or appropriate measures for preservation or mitigation that the tribe may recommend to the lead agency. (Pub. Resources Code §21080.3.2 (a)).
- 5. Confidentiality of Information Submitted by a Tribe During the Environmental Review Process:** With some exceptions, any information, including but not limited to, the location, description, and use of tribal cultural resources submitted by a California Native American tribe during the environmental review process shall not be included in the environmental document or otherwise disclosed by the lead agency or any other public agency to the public, consistent with Government Code §6254 (r) and §6254.10. Any information submitted by a California Native American tribe during the consultation or environmental review process shall be published in a confidential appendix to the environmental document unless the tribe that provided the information consents, in writing, to the disclosure of some or all of the information to the public. (Pub. Resources Code §21082.3 (c)(1)).
- 6. Discussion of Impacts to Tribal Cultural Resources in the Environmental Document:** If a project may have a significant impact on a tribal cultural resource, the lead agency's environmental document shall discuss both of the following:

  - a. Whether the proposed project has a significant impact on an identified tribal cultural resource.
  - b. Whether feasible alternatives or mitigation measures, including those measures that may be agreed to pursuant to Public Resources Code §21082.3, subdivision (a), avoid or substantially lessen the impact on the identified tribal cultural resource. (Pub. Resources Code §21082.3 (b)).

- 7. Conclusion of Consultation:** Consultation with a tribe shall be considered concluded when either of the following occurs:
- a. The parties agree to measures to mitigate or avoid a significant effect, if a significant effect exists, on a tribal cultural resource; or
  - b. A party, acting in good faith and after reasonable effort, concludes that mutual agreement cannot be reached. (Pub. Resources Code §21080.3.2 (b)).

**8. Recommending Mitigation Measures Agreed Upon in Consultation in the Environmental Document:** Any mitigation measures agreed upon in the consultation conducted pursuant to Public Resources Code §21080.3.2 shall be recommended for inclusion in the environmental document and in an adopted mitigation monitoring and reporting program, if determined to avoid or lessen the impact pursuant to Public Resources Code §21082.3, subdivision (b), paragraph 2, and shall be fully enforceable. (Pub. Resources Code §21082.3 (a)).

**9. Required Consideration of Feasible Mitigation:** If mitigation measures recommended by the staff of the lead agency as a result of the consultation process are not included in the environmental document or if there are no agreed upon mitigation measures at the conclusion of consultation, or if consultation does not occur, and if substantial evidence demonstrates that a project will cause a significant effect to a tribal cultural resource, the lead agency shall consider feasible mitigation pursuant to Public Resources Code §21084.3 (b). (Pub. Resources Code §21082.3 (e)).

**10. Examples of Mitigation Measures That, If Feasible, May Be Considered to Avoid or Minimize Significant Adverse Impacts to Tribal Cultural Resources:**

- a. Avoidance and preservation of the resources in place, including, but not limited to:
  - i. Planning and construction to avoid the resources and protect the cultural and natural context.
  - ii. Planning greenspace, parks, or other open space, to incorporate the resources with culturally appropriate protection and management criteria.
- b. Treating the resource with culturally appropriate dignity, taking into account the tribal cultural values and meaning of the resource, including, but not limited to, the following:
  - i. Protecting the cultural character and integrity of the resource.
  - ii. Protecting the traditional use of the resource.
  - iii. Protecting the confidentiality of the resource.
- c. Permanent conservation easements or other interests in real property, with culturally appropriate management criteria for the purposes of preserving or utilizing the resources or places.
- d. Protecting the resource. (Pub. Resource Code §21084.3 (b)).
- e. Please note that a federally recognized California Native American tribe or a non-federally recognized California Native American tribe that is on the contact list maintained by the NAHC to protect a California prehistoric, archaeological, cultural, spiritual, or ceremonial place may acquire and hold conservation easements if the conservation easement is voluntarily conveyed. (Civ. Code §815.3 (c)).
- f. Please note that it is the policy of the state that Native American remains and associated grave artifacts shall be repatriated. (Pub. Resources Code §5097.991).

**11. Prerequisites for Certifying an Environmental Impact Report or Adopting a Mitigated Negative Declaration or Negative Declaration with a Significant Impact on an Identified Tribal Cultural Resource:** An Environmental Impact Report may not be certified, nor may a mitigated negative declaration or a negative declaration be adopted unless one of the following occurs:

- a. The consultation process between the tribes and the lead agency has occurred as provided in Public Resources Code §21080.3.1 and §21080.3.2 and concluded pursuant to Public Resources Code §21080.3.2.
- b. The tribe that requested consultation failed to provide comments to the lead agency or otherwise failed to engage in the consultation process.
- c. The lead agency provided notice of the project to the tribe in compliance with Public Resources Code §21080.3.1 (d) and the tribe failed to request consultation within 30 days. (Pub. Resources Code §21082.3 (d)).

The NAHC's PowerPoint presentation titled, "Tribal Consultation Under AB 52: Requirements and Best Practices" may be found online at: [http://nahc.ca.gov/wp-content/uploads/2015/10/AB52TribalConsultation\\_CalEPAPDF.pdf](http://nahc.ca.gov/wp-content/uploads/2015/10/AB52TribalConsultation_CalEPAPDF.pdf)

## SB 18

SB 18 applies to local governments and requires local governments to contact, provide notice to, refer plans to, and consult with tribes prior to the adoption or amendment of a general plan or a specific plan, or the designation of open space. (Gov. Code §65352.3). Local governments should consult the Governor's Office of Planning and Research's "Tribal Consultation Guidelines," which can be found online at: [https://www.opr.ca.gov/docs/09\\_14\\_05\\_Updated\\_Guidelines\\_922.pdf](https://www.opr.ca.gov/docs/09_14_05_Updated_Guidelines_922.pdf).

Some of SB 18's provisions include:

1. **Tribal Consultation:** If a local government considers a proposal to adopt or amend a general plan or a specific plan, or to designate open space it is required to contact the appropriate tribes identified by the NAHC by requesting a "Tribal Consultation List." If a tribe, once contacted, requests consultation the local government must consult with the tribe on the plan proposal. **A tribe has 90 days from the date of receipt of notification to request consultation unless a shorter timeframe has been agreed to by the tribe.** (Gov. Code §65352.3 (a)(2)).
2. **No Statutory Time Limit on SB 18 Tribal Consultation.** There is no statutory time limit on SB 18 tribal consultation.
3. **Confidentiality:** Consistent with the guidelines developed and adopted by the Office of Planning and Research pursuant to Gov. Code §65040.2, the city or county shall protect the confidentiality of the information concerning the specific identity, location, character, and use of places, features and objects described in Public Resources Code §5097.9 and §5097.993 that are within the city's or county's jurisdiction. (Gov. Code §65352.3 (b)).
4. **Conclusion of SB 18 Tribal Consultation:** Consultation should be concluded at the point in which:
  - a. The parties to the consultation come to a mutual agreement concerning the appropriate measures for preservation or mitigation; or
  - b. Either the local government or the tribe, acting in good faith and after reasonable effort, concludes that mutual agreement cannot be reached concerning the appropriate measures of preservation or mitigation. (Tribal Consultation Guidelines, Governor's Office of Planning and Research (2005) at p. 18).

Agencies should be aware that neither AB 52 nor SB 18 precludes agencies from initiating tribal consultation with tribes that are traditionally and culturally affiliated with their jurisdictions before the timeframes provided in AB 52 and SB 18. For that reason, we urge you to continue to request Native American Tribal Contact Lists and "Sacred Lands File" searches from the NAHC. The request forms can be found online at: <http://nahc.ca.gov/resources/forms/>.

### NAHC Recommendations for Cultural Resources Assessments

To adequately assess the existence and significance of tribal cultural resources and plan for avoidance, preservation in place, or barring both, mitigation of project-related impacts to tribal cultural resources, the NAHC recommends the following actions:

1. Contact the appropriate regional California Historical Research Information System (CHRIS) Center ([https://ohp.parks.ca.gov/?page\\_id=30331](https://ohp.parks.ca.gov/?page_id=30331)) for an archaeological records search. The records search will determine:
  - a. If part or all of the APE has been previously surveyed for cultural resources.
  - b. If any known cultural resources have already been recorded on or adjacent to the APE.
  - c. If the probability is low, moderate, or high that cultural resources are located in the APE.
  - d. If a survey is required to determine whether previously unrecorded cultural resources are present.
2. If an archaeological inventory survey is required, the final stage is the preparation of a professional report detailing the findings and recommendations of the records search and field survey.
  - a. The final report containing site forms, site significance, and mitigation measures should be submitted immediately to the planning department. All information regarding site locations, Native American human remains, and associated funerary objects should be in a separate confidential addendum and not be made available for public disclosure.
  - b. The final written report should be submitted within 3 months after work has been completed to the appropriate regional CHRIS center.



3. Contact the NAHC for:
  - a. A Sacred Lands File search. Remember that tribes do not always record their sacred sites in the Sacred Lands File, nor are they required to do so. A Sacred Lands File search is not a substitute for consultation with tribes that are traditionally and culturally affiliated with the geographic area of the project's APE.
  - b. A Native American Tribal Consultation List of appropriate tribes for consultation concerning the project site and to assist in planning for avoidance, preservation in place, or, failing both, mitigation measures.
  
4. Remember that the lack of surface evidence of archaeological resources (including tribal cultural resources) does not preclude their subsurface existence.
  - a. Lead agencies should include in their mitigation and monitoring reporting program plan provisions for the identification and evaluation of inadvertently discovered archaeological resources per Cal. Code Regs., tit. 14, § 15064.5(f) (CEQA Guidelines § 15064.5(f)). In areas of identified archaeological sensitivity, a certified archaeologist and a culturally affiliated Native American with knowledge of cultural resources should monitor all ground-disturbing activities.
  - b. Lead agencies should include in their mitigation and monitoring reporting program plans provisions for the disposition of recovered cultural items that are not burial associated in consultation with culturally affiliated Native Americans.
  - c. Lead agencies should include in their mitigation and monitoring reporting program plans provisions for the treatment and disposition of inadvertently discovered Native American human remains. Health and Safety Code § 7050.5, Public Resources Code § 5097.98, and Cal. Code Regs., tit. 14, § 15064.5, subdivisions (d) and (e) (CEQA Guidelines § 15064.5, subds. (d) and (e)) address the processes to be followed in the event of an inadvertent discovery of any Native American human remains and associated grave goods in a location other than a dedicated cemetery.

If you have any questions or need additional information, please contact me at my email address: [Pricilla.Torres-Fuentes@nahc.ca.gov](mailto:Pricilla.Torres-Fuentes@nahc.ca.gov)

Sincerely,

Pricilla Torres-Fuentes  
Cultural Resources Analyst

cc: State Clearinghouse

January 4, 2024

Jonathan Snyder, Assistant Field Supervisor  
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**SUBJECT: Fenton Parkway Bridge Project: City of San Diego Essential Public Project**

Dear Mr. Snyder and Mr. Mayer:

The City of San Diego (The City) appreciates Wildlife Agencies' comments FWS/CDFW-23-0090700-CEQA\_SD received by San Diego State University (SDSU) in response to Notice of Preparation of an Initial Study and Draft Environmental Impact Report for the Fenton Parkway Bridge Project (SCH#2023050534). The City offers the following analysis to demonstrate the proposed project has been determined essential in both location and need. The City considers the proposed project an Essential Public Project (EPP) pursuant to the City of San Diego Land Development Code (LDC) §143.0150(d)(1)(B)(ii).

**MISSION VALLEY COMMUNITY PLAN CIRCULATION ELEMENT ROAD, (MOBILITY PLANNING DIVISION, SUSTAINABILITY AND MOBILITY DEPARTMENT)**

The LDC considers a project an EPP when the project is determined to serve one or more of the following essential public needs: Linear infrastructure, including but not limited to major roads and land use plan circulation element roads and facilities including bike lanes, water and sewer pipelines including appurtenances, and storm water conveyance systems including appurtenances.

The Fenton Parkway extension and bridge connection over the San Diego River to Camino del Rio North and Mission City Parkway was determined to be an essential public facility needed to support existing and planned growth and was included in the Mission Valley Community Plan update (CPU) adopted in September 2019 as a four-lane collector street with pedestrian and bicycle facilities. This connection was carried over from the previous 1985 community plan in which it was classified as a four-lane major street. The change from a four-lane major to a four-lane collector street classification as part of the 2019 CPU was intended to allow for a narrower cross section and less impactful bridge across the sensitive San Diego River.

Subsequently, with further study conducted as part of the nearby SDSU Mission Valley project including consideration of the potential environmental impacts of a four-lane bridge and alternatives, the City determined that a further downgrade in the classification of the bridge connection from four-lane collector to two-lane collector with center painted/convertible median would be accepted.

General transportation planning principles and the City's General Plan encourage a grid network of streets to provide accessibility, reduced travel distances, resiliency and to distribute traffic loads. In Mission Valley, steep slopes, the San Diego River, five freeways, and the San Diego Trolley tracks have created barriers and limited the opportunities for connectivity within as well as to and from the community. This has resulted in a planned street network that consists of fewer and wider streets and intersections to accommodate the movement of people and goods, which in turn results in less distributed/more concentrated traffic flows, turning many of these streets and intersections into barriers in and of themselves, especially for transit users, cyclists and pedestrians. Given the limited planned north-south street connectivity in Mission Valley, completion of the Fenton Parkway connection is essential to meet the mobility, emergency, utility, and equity needs of the community and the City.

Supporting active transportation (walking, bicycling, and transit) mode shift is an important component of the City's Climate Action Plan (CAP) which aims to achieve net zero greenhouse gas emissions by year 2035. The CAP Targets include resident mode shares of 25% walking, 10% cycling, and 15% transit by year 2035. The Fenton Parkway connection is critical to provide a safer and higher quality/lower stress environment for pedestrians and cyclists to help achieve the City's CAP targets, including providing access for Mid-City residents to the Green Line Fenton Parkway trolley station and the SDSU Mission Valley campus via the SR 15 bikeway that was completed in August 2017. The Fenton Parkway connection will provide an additional routing option for transit connectivity and improve bus and shuttle access to the SDSU Mission Valley campus while reducing traffic congestion on other transit routes which improves the reliability of bus services in Mission Valley and other areas.

The lack of a connection at Fenton Parkway also greatly increases the amount of out-of-direction vehicular travel within eastern Mission Valley. Out-of-direction travel from inefficient routing significantly contributes to increased greenhouse gas (GHG) emissions. When individuals or goods are transported along routes that deviate from the most direct and optimized paths, vehicles expend more fuel and energy, resulting in higher emissions. These longer routes not only require more time and resources but also lead to increased exhaust emissions of carbon dioxide (CO<sub>2</sub>), methane (CH<sub>4</sub>), and nitrous oxide (N<sub>2</sub>O). In addition to the direct environmental impact, out-of-direction travel exacerbates traffic congestion, which further escalates emissions due to idling vehicles and inefficient traffic flow. Reducing out-of-direction travel through improved local connectivity is a crucial step towards mitigating the detrimental effects of GHG emissions and meeting Climate Action Planning Goals. The creation of the Fenton Parkway bridge will help with GHG emission reductions now and as the community continues to grow in the future.

The Mission Valley community is expected to have significant growth in the coming years. In response to the local housing crisis, the City of San Diego updated the Mission Valley Community Plan and rezoned all the properties in the area to allow a significant increase in residential development in the community with complementary employment growth.

The following table presents the anticipated buildout of the Mission Valley Community in 2050 as estimated in the Program Environmental Impact Report for the CPU, which was certified by the City of San Diego in 2019. The analysis of impacts in the PEIR anticipated the development of the Fenton Parkway bridge at project buildout. Continued growth in the community without the development of the bridge has the potential to trigger significant environmental impacts in the areas of GHG, air quality, and noise.

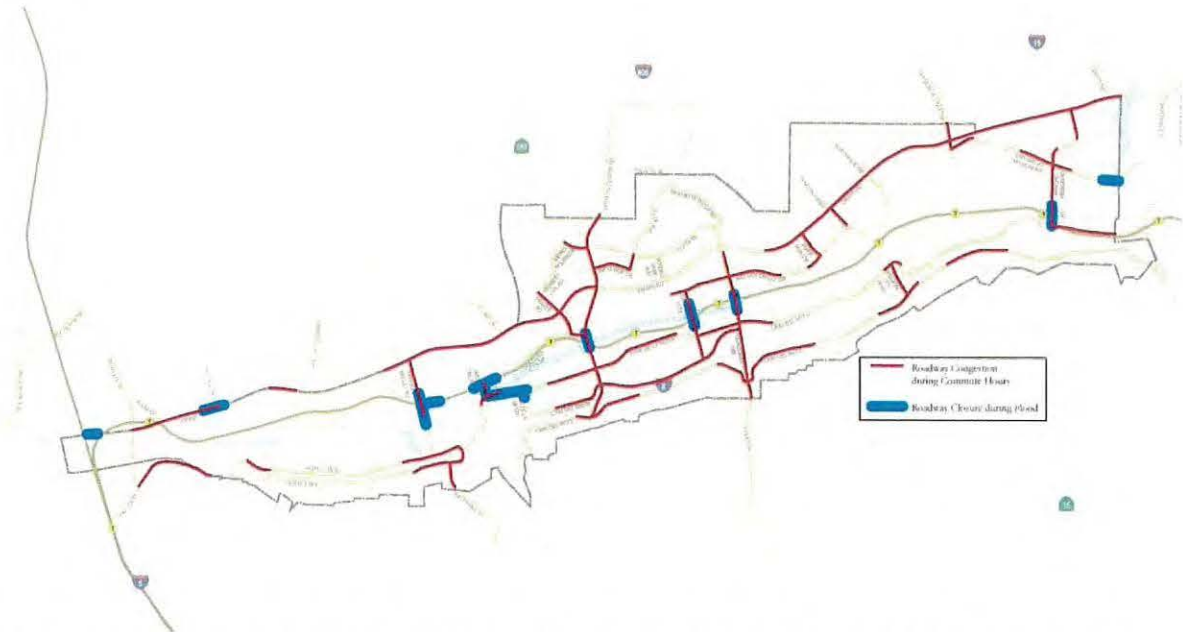
	<b>Base Year (2012)</b>	<b>Buildout (2050)</b>	<b>Net Increase</b>	<b>Percent Change</b>
Housing Units	11,240	39,160	27,910	248%
Household Population	20,800	72,400	51,600	248%
Non-Residential Square Feet	17,667,000	25,038,000	7,371,000	42%
Employment	45,600	64,700	19,100	42%
Hotel Rooms	6,696	8,249	1,553	23%

Source: City of San Diego Mission Valley Community Plan Update / Project No. 518009 / Final Program Environmental Impact Report Appendix B

Additionally, multiple additional factors compound the need for completion of the Fenton Parkway extension/bridge, which are discussed below.

Flooding

During recurring flooding events in Mission Valley, every street crossing the San Diego River (seven) and some roadways adjacent to the River (three) become impassable.



The only way to travel across the San Diego River on the east side of Mission Valley during these events is via I-15. Since pedestrians and cyclists cannot use the freeway, they are unable to cross the river during flooding events. The Fenton Parkway extension will remedy this issue providing a high-water crossing of the San Diego River that also provides access to the Green Line Trolley and SDSU Mission Valley Campus from the Mid City communities via the SR 15 Bike Path.

The following are the adjacent surface streets that close due to flooding:

- Fashion Valley Road across river
- Riverwalk Drive (behind Fashion Valley Mall) adjacent to river
- Avenida del Rio across river
- Camino de la Reina from west of Avenida del Rio to just east of Camino de la Siesta
- Mission Center Road across river
- Camino del Este across river
- Qualcomm Way across river
- Ward Road across river
- San Diego Mission Road across river
- Friars Road from west of Colusa to just east of Colusa Street

The following are transit services that are rerouted and impacted/delayed due to flooding:

- o Significant flooding at Fashion Valley Road and Fashion Valley Transit Center has required transit operations to relocate to the Mission Valley Center Transit Station affecting all transit routes that utilize the Fashion Valley Transit Center. Flooding-related closures of the Fashion Valley Transit Center impact Routes 1, 6, 20, 25, 41, 88, 120, and 928, and may also require Sycuan Green Line service to bypass the station.

- Route 6 normally uses Camino de la Reina and Avenida Del Rio to access the Fashion Valley Transit Center.
- Routes 1, 20, 41, 88, and 120 normally use Fashion Valley Road to access the Fashion Valley Transit Center.
- Route 14 normally uses Ward Road to access the Mission San Diego and Grantville Trolley Stations.

When routes are detoured, access is lost to certain bus stops and those riders are unable to use transit during the detour.

Transit routes that are not rerouted during a flooding event are affected by increased traffic and congestion along their routes caused by the other rerouted vehicular traffic. In addition, road closures result in longer response times to transit-related emergencies and operational situations by MTS transit enforcement, supervisors, and maintenance personnel. Having a high-water crossing that provides an alternate route is critically important.

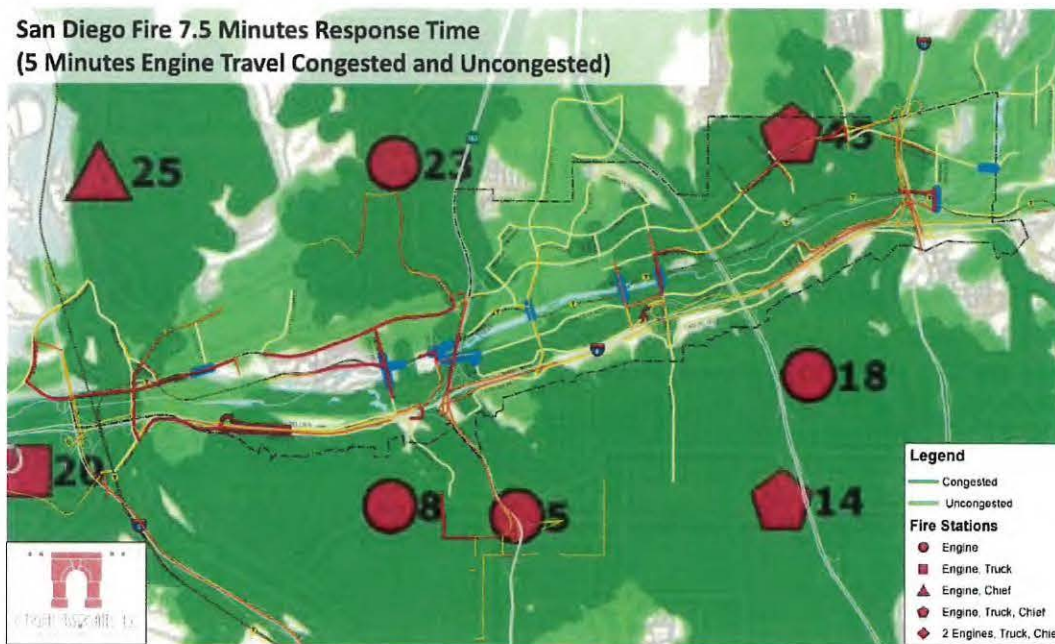
Emergency response concerns during flooding:

- Emergency response during flooding events (for both flood-related emergencies/rescues and non-flood-related emergencies) is significantly hampered by a lack of north-south connectivity in the community.
- See below for general Public Safety and Emergency Response considerations, which are more critical during flooding events, due to the extensive street closures that occur.

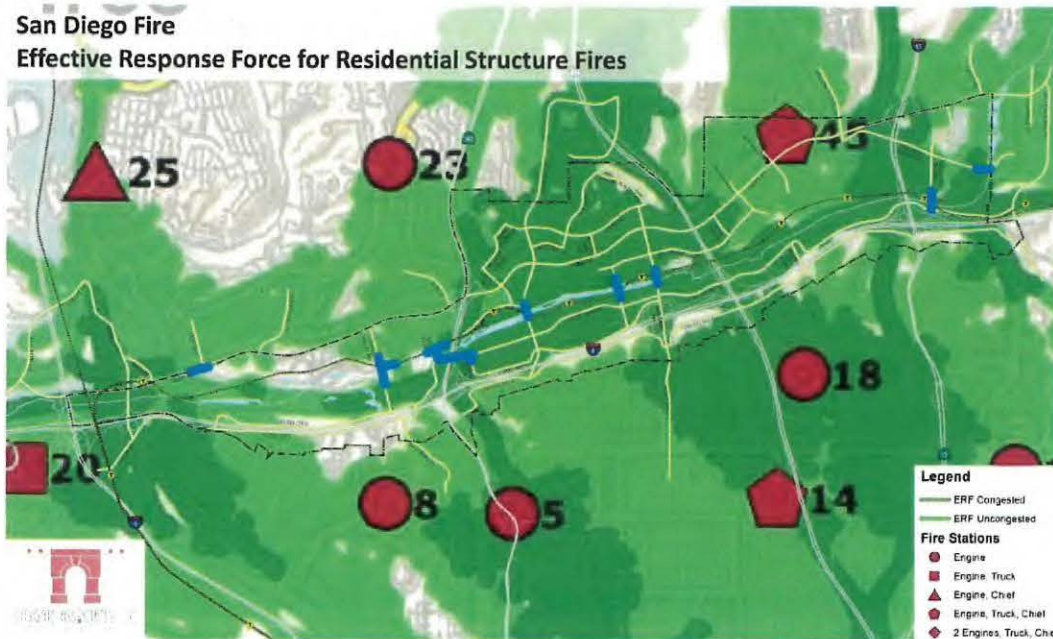
#### **EMERGENCY SERVICES, (FIRE-RESCUE DEPARTMENT)**

While the [Citygate Report](#) (2017) does not specifically call out any gaps in Mission Valley in their analysis, the [Map Atlas](#) still shows gaps in coverage within Mission Valley. Specifically, in Map 3b "5 Minute Engine Travel Congested and Uncongested", there is an apparent gap around the Riverwalk Golf Course as shown in the inserted map below. In addition, Map 5b from Map Atlas pg. 21 inserted below "Effective Response Force (ERF) For Residential Structure Fires Congested and Uncongested" shows gaps at the Riverwalk Golf Course and along the south side of Mission Valley with much of eastern Mission Valley not experiencing coverage in congested conditions. Since the 2017 Citygate study, development has increased to include SDSU Mission Valley. Additionally, planned development in the Mission Valley area will continue to increase traffic congestion.

ADUs will increase the need for ingress and egress options during emergencies due to any additional population density. This will improve the need for access to transportation hubs as Mission Valley Community Plan area accommodates planned housing needs. The Fenton Parkway Bridge connection would provide improved police, fire-rescue, lifeguard/swift-water rescue, ambulance emergency response times, and improved emergency transport times to hospitals. Mobility connection in the location would reduce the risk that an area of the community will become inaccessible if all or a part of a roadway is blocked and improve access to UCSD Hillcrest Medical Center. Additionally, the bridge connection location would improve the ability for fire stations to serve a greater area when multiple stations are responding to incidents and/or covering adjacent districts. The bridge connection location would provide multiple approach route options for emergency response and alternate routes for diverting traffic during emergencies that close road(s). This planned connection is particularly important because there are often multiple responders to an incident who need access from different directions to the area and stage.



Source: Excerpt from Map 3b. Standards of Response Cover Review: Volume 3 Map Atlas, San Diego Fire-Rescue Department & Citygate Associates, LLC, 2017



Source: Excerpt from Map 5b. Standards of Response Cover Review: Volume 3 Map Atlas, San Diego Fire-Rescue Department & Citygate Associates, LLC, 2017

The following information addresses public safety – emergency/disaster planning, response, and recovery. Flooding is the most frequently recurring hazard in Mission Valley and has repeatedly resulted in closure of every surface street that crosses the San Diego River. Additionally, much of Mission Valley is in the [Very High Fire Hazard Severity Zone \(VHFHSZ\)](#). The area of the proposed project is in the VHFHSZ, and it will provide additional access and routes for deployment of emergency responses during a wildfire event (See Attachment 1).

The proposed Fenton Parkway Bridge Extension will serve as an additional access option to protect city-owned land in the VHFHSZ for which the city is financially responsible. Additional access provides the option for emergency response improvements to known areas surrounded by canyons that have had a previous large or historic wildfire event. New access, response routes, and earlier deployment of resources may prevent loss of life and property and protect environmentally sensitive lands and habitats. (See Attachment 2, Burn History and Attachment 3, Eco Canyons.)

The proposed location of the Fenton Parkway Bridge Extension will provide new access to communities with one emergency ingress and community evacuation route. Fire-Rescue in coordination with CAL Fire has identified one or more communities as an at-risk community through AB2911 Subdivision review program. (See Attachment 4, Communities With Only One Evacuation Route.) Communities will benefit from improvements to new emergency response time, access, and additional emergency evacuation/ingress options the proposed project provides.



Climate change adaptation and resilience considerations include increased frequency and duration of severe weather events including extreme rainfall and drought and their consequences which include flooding, erosion, and wildfires. The potential for multiple co-occurring incidents is greater, such as freeway transportation incidents on limited number of facilities during evacuation and/or disaster response. Additionally, there are existing geologic hazards in the area that include the bridge location being in a "High Potential" area for liquefaction in the [Seismic Safety Study](#).

**ESSENTIAL PUBLIC UTILITIES**

The Fenton Parkway bridge design will include 24-inch openings through abutments and bridge cells with access panels for potential future water or sewer main infrastructure. The construction of this bridge will minimize impacts from future pipeline infrastructure projects and provides necessary connections for the continued improvements of the City's water and wastewater systems.

**CONCLUSION**

For the reasons outlined above, the City has determined the Fenton Parkway extension to be essential, in both location and need, to support existing development and planned growth in Mission Valley and the City of San Diego. The City considers the proposed project an Essential Public Project (EPP) pursuant to the City of San Diego Land Development Code (LDC) §143.0150(d)(1)(B)(ii). It will provide a critical connection needed for pedestrian, bicycle, transit, and vehicular access, emergency access, emergency response, as well as a high-water crossing for all modes during recurring severe flooding in the community.

The connection will make it possible for many Mission Valley and Mid-City residents to access the Green line trolley and SDSU Mission Valley using alternative modes, and will reduce out of direction vehicular travel, all contributing to fewer vehicle miles traveled and associated greenhouse gas emissions which are critical to the City meeting the Climate Action Plan goals.

The City recognizes the environmentally sensitive lands of the San Diego River and has reduced the street classification, decreased the number of lanes, and minimized the bridge deck width to the maximum extent feasible.

Sincerely,



Heidi Vonblum, Director  
City Planning Department

Sincerely,



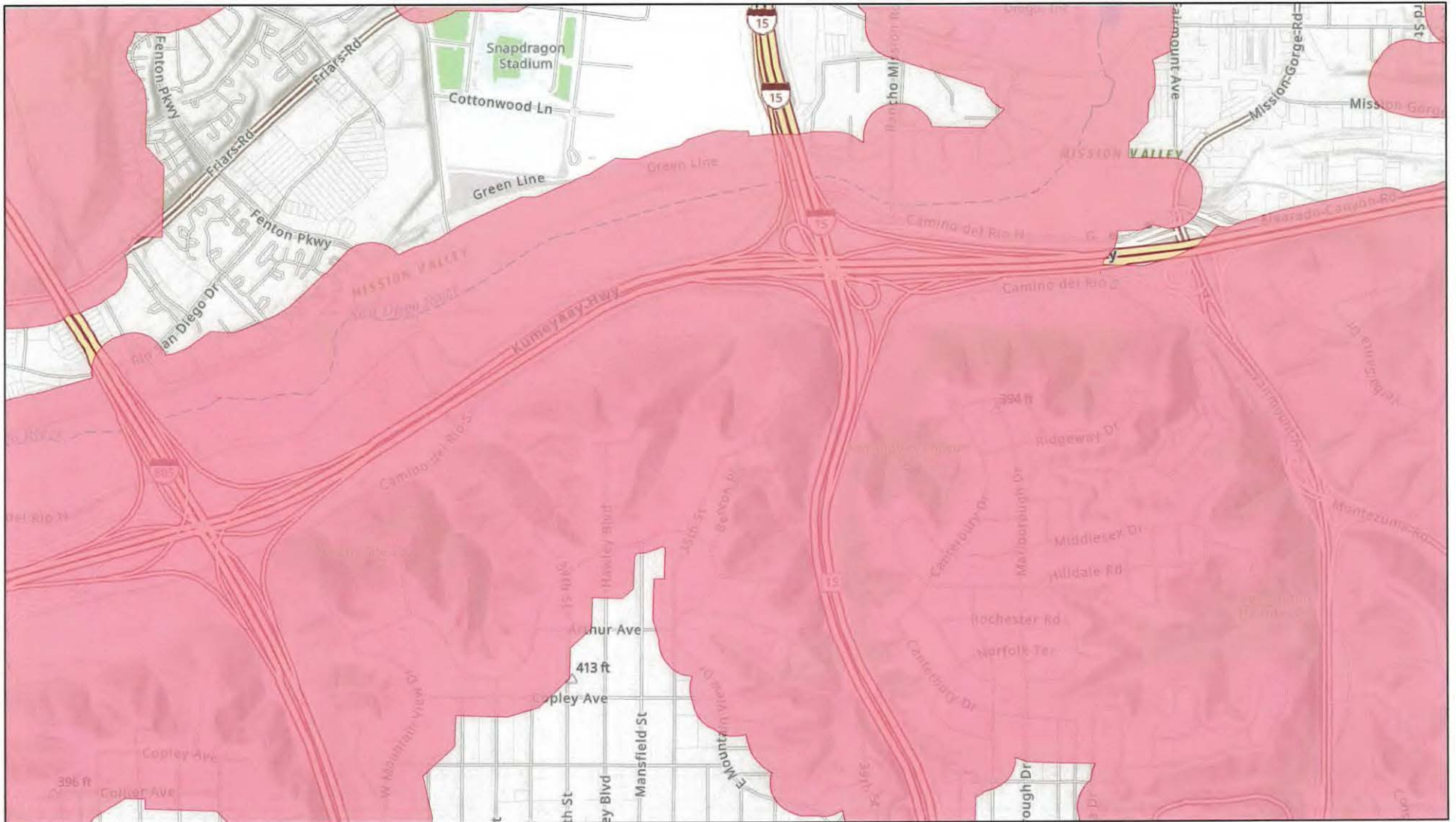
James Nagelvoort, Director  
Strategic Capital Projects Department

- Attachments:
1. Very High Fire Hazard Severity Zone
  2. Burn Areas
  3. Eco Canyons
  4. Communities With Only One Evacuation Route


cc: Bethany Bezak, City of San Diego • Director • Transportation  
Alysa Muto, City of San Diego • Director • Sustainability and Mobility  
Kristy Reeser, City of San Diego • Deputy Director • Sustainability and Mobility  
Kelley Stanco, City of San Diego • Deputy Director • City Planning Department  
Julia Chase, City of San Diego • Chief Resiliency Officer • City Planning Department  
Keli Balo, City of San Diego • Interim Deputy Director of Engineering and Program Management  
Public Utilities  
Abi Palaseyed, City of San Diego • Assistant Deputy Director • Strategic Capital  
Projects Department  
Philip Trom, City of San Diego • Program Manager • Sustainability and Mobility Paul Jackson, San  
Diego State University  
Megan Hickey, City of San Diego • Project Officer II/Principal Water Resources Specialist • Public  
Utilities  
Maureen Gardiner, City of San Diego • Senior Traffic Engineer • Sustainability and Mobility

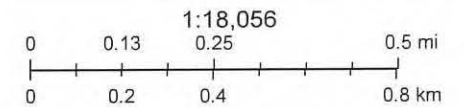
# Very High Fire Hazard Severity Zones

## ATTACHMENT 1



9/20/2023, 11:43:28 AM

 Fire - Very High Fire Hazard Severity Zones



Esri Community Maps Contributors, SanGIS, California State Parks, Esri, HERE, Garmin, SafeGraph, GeoTechnologies, Inc, METI/NASA, USGS, Bureau of Land Management, EPA, NPS, US Census Bureau, USDA, Esri, NASA, NGA, USGS, FEMA

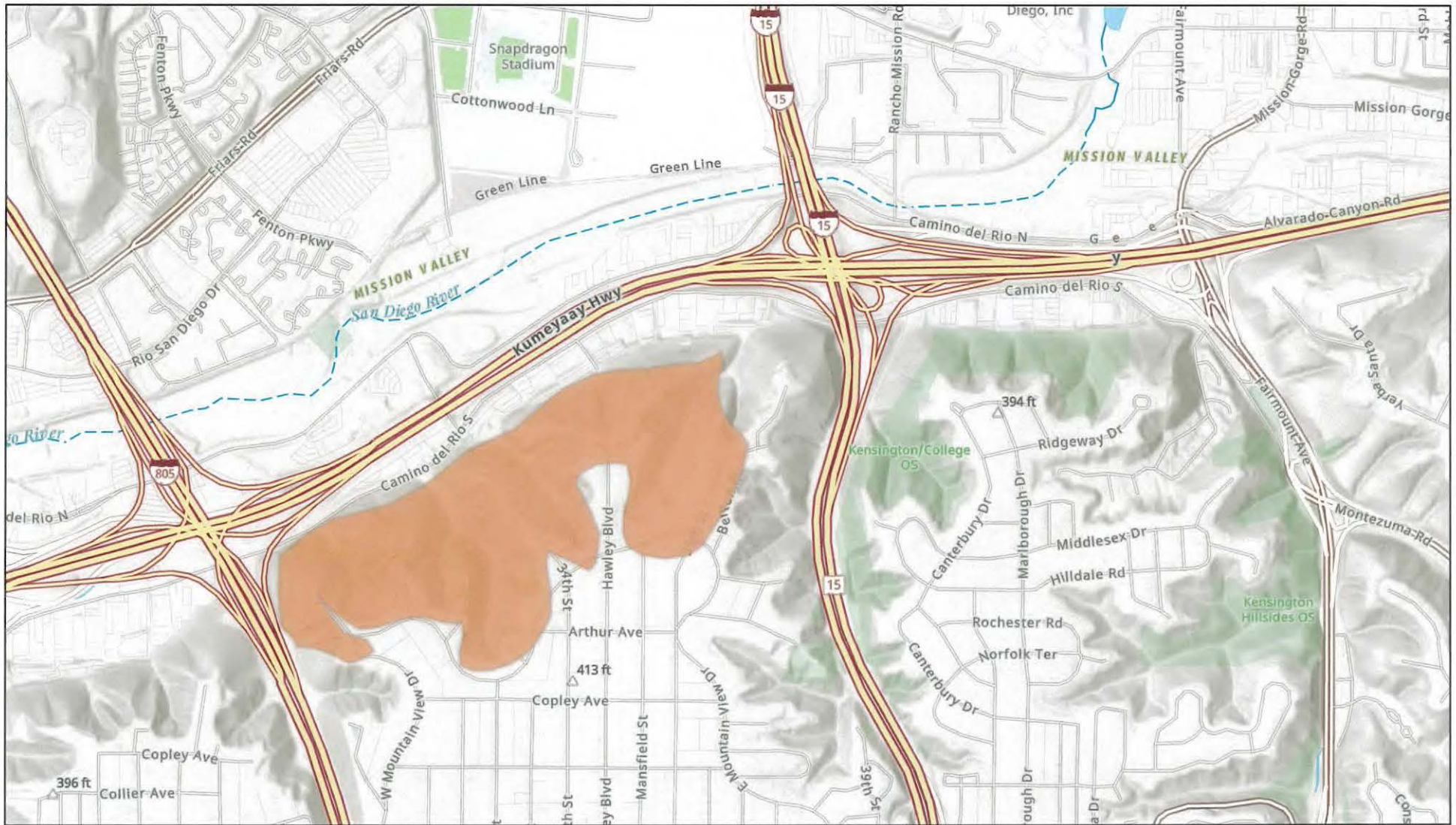
SDFD Community Risk Reduction Division

Numerous federal agencies have provided data that help us to identify FRA lands (BLM, U.S. Forest Service, National Park Service, U.S. Fish and Wildlife Service, Bureau of Indian Affairs). | Robin Gilson, Mark Jennings | City of San Diego using San Diego County Assessor Parcel data available




# Burn History

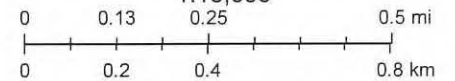
## ATTACHMENT 2



9/20/2023, 11:42:49 AM

 Burn History

1:18,056



Esri Community Maps Contributors, SanGIS, California State Parks, Esri, HERE, Garmin, SafeGraph, GeoTechnologies, Inc, METI/NASA, USGS, Bureau of Land Management, EPA, NPS, US Census Bureau, USDA, Esri, NASA, NGA, USGS, FEMA

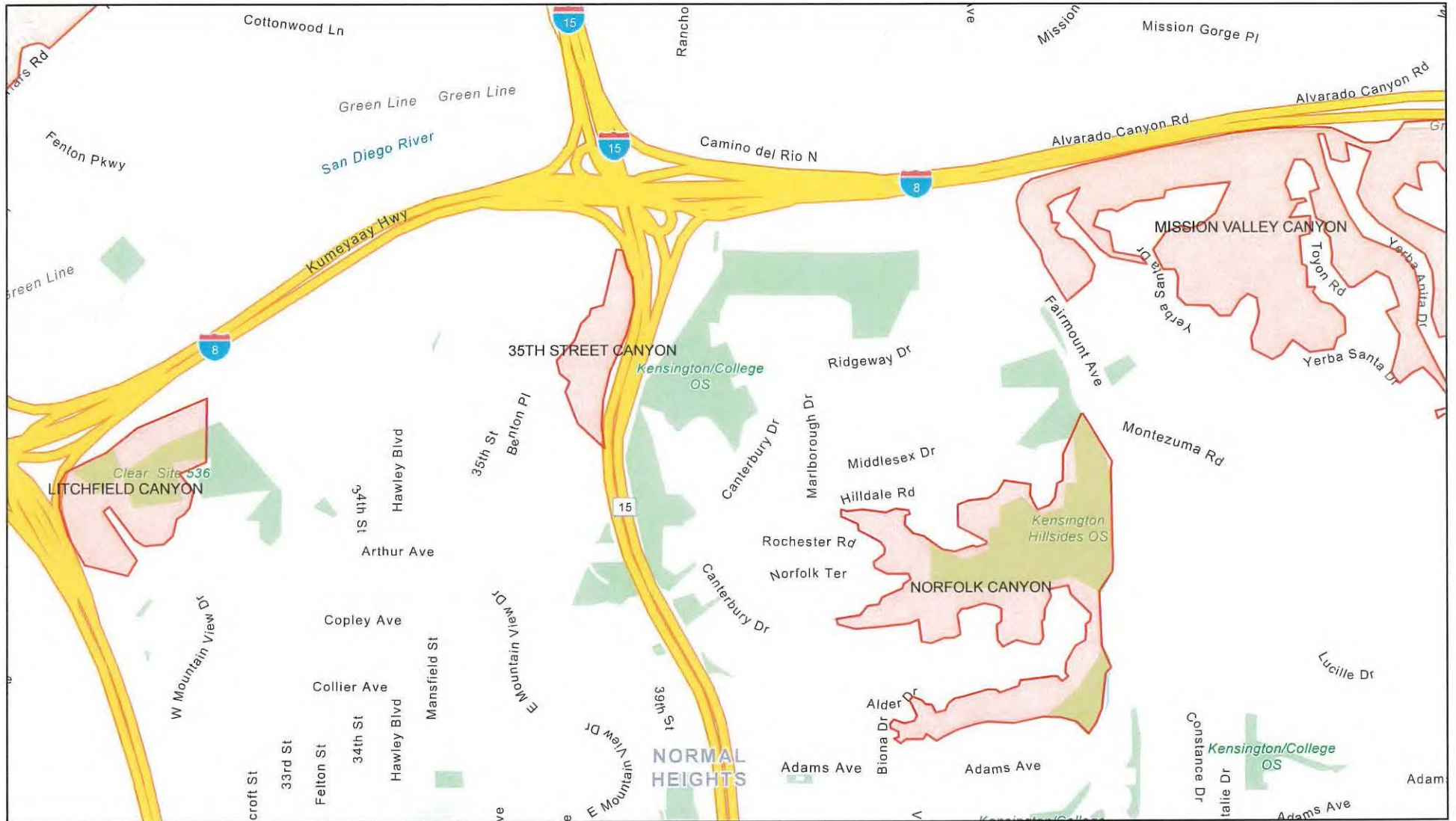
SDFD Community Risk Reduction Division

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# Eco Canyons

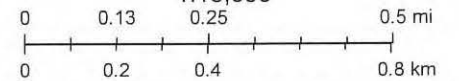
## ATTACHMENT 3



10/10/2023, 9:08:09 PM

 ECO CANYONS

1:18,056



Esri Community Maps Contributors, SanGIS, California State Parks, Esri, HERE, Garmin, SafeGraph, GeoTechnologies, Inc, METI/NASA, USGS, Bureau of Land Management, EPA, NPS, US Census Bureau, USDA

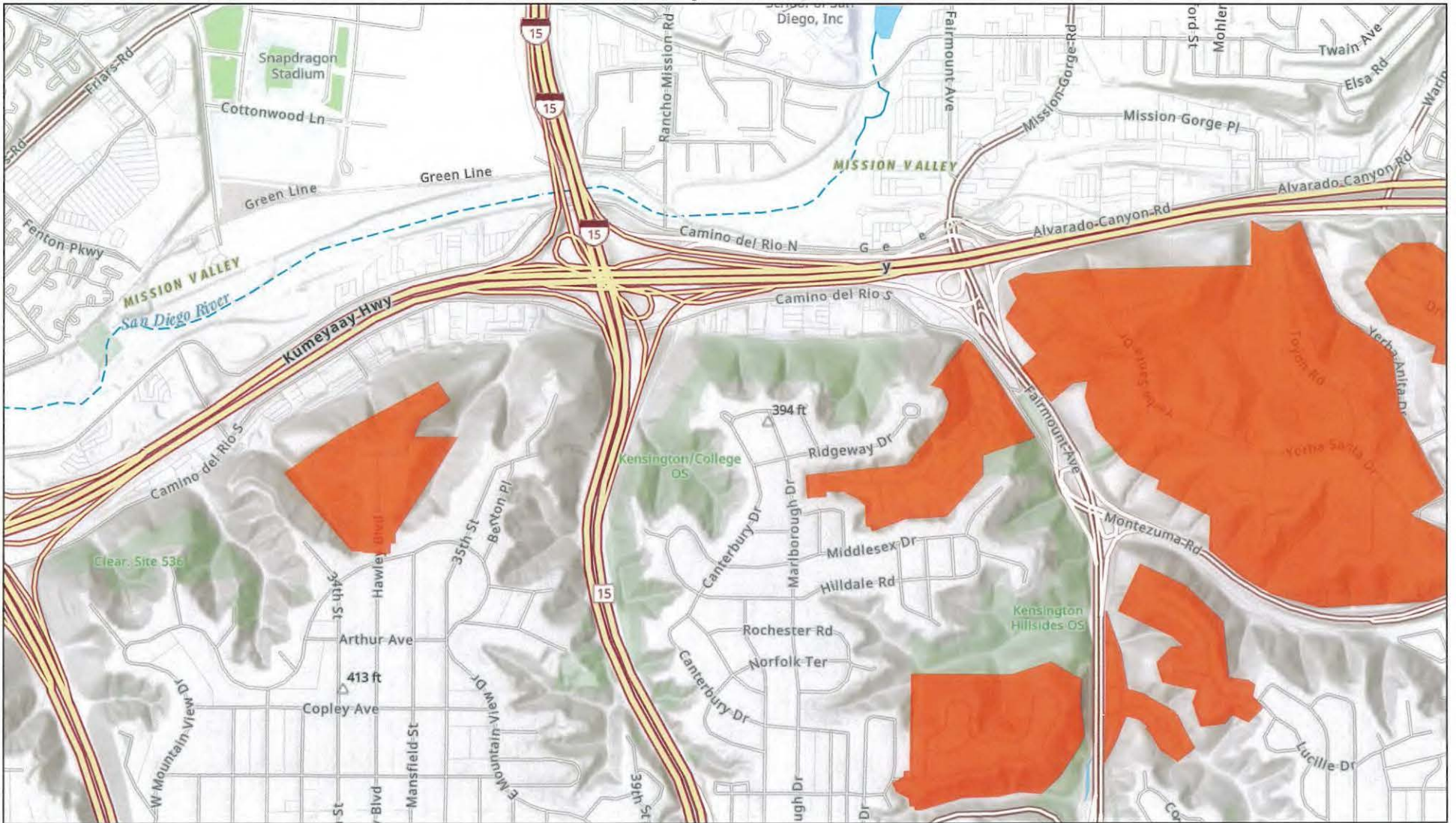
SDFD Community Risk Reduction Division

Numerous federal agencies have provided data that help us to identify FRA lands (BLM, U.S. Forest Service, National Park Service, U.S. Fish and Wildlife Service, Bureau of Indian Affairs). | Robin Gilson, Mark Jennings | City of San Diego using San Diego County Assessor Parcel data available





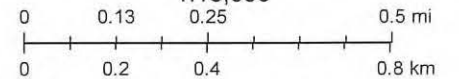
# Communities With Only One Evacuation Route



9/20/2023, 11:18:20 AM

 Subdivisions (AB2911)

1:18,056



Esri Community Maps Contributors, SanGIS, California State Parks, Esri, HERE, Garmin, SafeGraph, GeoTechnologies, Inc, METI/NASA, USGS, Bureau of Land Management, EPA, NPS, US Census Bureau, USDA, Esri, NASA, NGA, USGS, FEMA

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Numerous federal agencies have provided data that help us to identify FRA lands (BLM, U.S. Forest Service, National Park Service, U.S. Fish and Wildlife Service, Bureau of Indian Affairs). | Robin Gilson, Mark Jennings | City of San Diego using San Diego County Assessor Parcel data available





# SIERRA CLUB

## SAN DIEGO CHAPTER

Paul Jackson,  
Program Manager San Diego State University  
Facilities Planning, Design, and Construction  
5500 Campanile Drive San Diego,  
California 92182-1624

Via Email:

[pjackson@sdsu.edu](mailto:pjackson@sdsu.edu)

CC:

Gina Jacobs [gina.jacobs@sdsu.edu](mailto:gina.jacobs@sdsu.edu)

Sierra Conscom Ron Askeland <[Ron.Askeland@gmail.com](mailto:Ron.Askeland@gmail.com)>

Richard Miller [richard.miller@sierraclub.org](mailto:richard.miller@sierraclub.org)

Laura Hunter <[laurahunter744@gmail.com](mailto:laurahunter744@gmail.com)>

Deborah Knight <[dknight3@san.rr.com](mailto:dknight3@san.rr.com)>

Dear Mr. Jackson

Sierra Club San Diego has been enthusiastic supporters of San Diego State Mission Valley from its proposal stage and worked hard to pass the SDSU West ballot measure. We appreciate your ongoing attention to environmental issues and to the California Environment Quality Act. We continue to be big supporters and appreciate the opportunity to comment on ongoing environmental issues as they come up.

This letter is in response to the notice of preparation for the Fenton Parkway Bridge Project. We appreciate that SDSU will do an EIR on the proposed bridge and we offer these comments to help guide that environmental review.

In most respects the project seems to be environmentally sensitive and the project has our support. The following are a few important issues that need to be addressed in the forthcoming EIR.

- 1) **Mitigating the loss of riparian habitat.** The notice of preparation recognizes that, "A portion of the project site traverses and lies adjacent to the City's Stadium Wetland Mitigation Site and the City's Multi-Habitat Planning Area (MHPA)." Since the bridge impacts over one acre of river habitat the Sierra Club requests appropriate mitigation and restoration of the San Diego River somewhere along its basin. Mitigation should be on a 2:1 basis and should not overlap with other mitigation commitments made by SDSU or anyone else.
- 2) **Analyzing the bridge lights over a riparian habitat.** The notice of preparation states: "Bridge lighting would be mounted on the side barriers outside of the pedestrian walkways." During our many meetings of the River Park committee, Sierra Club and other participants

emphasized the necessity of shielding the SDSU Mission Valley River Park from intrusive lighting. The EIR should study the impact of bridge lighting on the ecosystem of the river park with special emphasis on native flora and fauna. The EIR should also study the intensity and direction of the lighting and provide and analyze various lighting alternatives including a “no lighting alternative.” Additionally, the EIR should analyze the impact of vehicle headlights on the bridge and propose alternative bridge designs that eliminate or reduce the impact of vehicle headlights on the riparian habitat and the sensitive species in the river basin. Finally, we are glad that the “The Draft EIR will address new sources of light and glare resulting from project construction activities and operation. Feasible mitigation measures will be provided (if necessary).” Construction should take place only during daylight hours to prevent harmful nighttime construction lighting.

- 3) Staging area location. Figure 2 shows potential staging areas north of the San Diego River that are most likely in the footprint of the proposed and already developing SDSU Mission Valley River Park. Sierra Club recommends that the construction staging area be located south of the San Diego River in the proposed staging area between Camino Del Rio North and Mission City Parkway and to the west of Mission City Parkway in existing parking lots.
- 4) Sierra Club strongly urges SDSU to use electric construction equipment to the extent possible rather than diesel or gasoline powered equipment. Such a move would be consistent with the SDSU Green Campus plan and the City of San Diego Climate Plan. The EIR should examine the nature of construction equipment in the EIR. Additionally, the EIR should detail plans to mitigate greenhouse gas generated by the project.

Sincerely Yours,

Dr. Peter Andersen  
Vice Chairperson, Conservation Committee  
Sierra Club San Diego  
[Westone47@gmail.com](mailto:Westone47@gmail.com)

Dr. Ron Askeland  
Chairperson, Conservation Committee  
Sierra Club San Diego

June 20  
FIR D=2023

450 x 58 x

6/5/2023

## Initial Study

Pg 21 Does not result in loss of forest land

Not zoned as forest

Zoned as Open Space - Floodland

That is a significant change

No project impacts to forest land would

occur, will not be decreased

Pg 25 may conflict with local policies  
and ordinances including those intended  
to protect and preserve trees

## Biological Resources technical report

Pg 26 Soils - no mention of soils  
that will support native wildlife

<sup>3.8</sup>  
Pg 30 GHGs - analyze GHGs  
both with and without the project  
over its lifetime

- Nothing about minimizing escaped lightning
- How can connectivity with MHPA be mitigated?

ped bridge as alternative

High water refuge

Bird Strikes

Wetland Mitigation Bank

Jim Peugh J. P. Audubon June 5  
peugh@cox.net





Paul Jackson <pjackson@sdsu.edu>

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## Fenton Parkway Bridge Project

1 message

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**Adam Gottsch** <adam.gottsch@gmail.com>  
To: pjackson@sdsu.edu

Tue, Jun 6, 2023 at 6:44 PM

Hi Paul,

Thanks for attending and sharing about the Fenton Parkway Bridge Project at the Normal Heights meeting. I would love to see the university include artwork or sculptures in the bridge to really showcase the university's commitment and talents in the community.

Best of luck with your project.

Adam Gottsch  
Normal Heights



Paul Jackson &lt;pjackson@sdsu.edu&gt;

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**Fenton Parkway Bridge re: bicycling**

1 message

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**Jim Baross** <jimbaross@gmail.com>  
To: jblake@sdsu.edu, "pjackson@sdsu.edu" <pjackson@sdsu.edu>  
Cc: nhcpc-board@googlegroups.com

Thu, Jun 8, 2023 at 12:37 PM

Thank you for presenting this project plan to the Normal Heights Community Planning Group on June 6th. I and others present appreciated the information, detail, and responses to questions/concerns.

- <https://bfa.sdsu.edu/campus/facilities/planning/docs/5-22-23-fenton-parkway-bridge-nop.pdf>
- <https://bfa.sdsu.edu/campus/facilities/planning/eir>

I am sending this email with some questions to further explain the concerns I raised at the meeting and offer suggestions for improving the plan for the bridge project.

1. The bridge will provide a useful, shorter, and safer connection for travel - by vehicles, bikes, and pedestrians - north and south of the SD River. Now, if you could get us a paved connection from the south side of Camino del Rio South at Mission Center Parkway up the canyon side to 34th Street, I would recommend naming the new connection after you or your firstborn child.

2. I expect that the sidewalk and bikeway will be built to conform to the CA-MUTCD, Design Information Bulletin 89-02, FHWA Separated Bike Lane [sic] Planning and Design Guide, and related recommendations for sidewalks and adjacent bikeways - Class I, II, III, and IV.

A. Will the bikeway be one-way or two-way on each side of the bridge and how will this be communicated to travelers?

3. You stated that the bikeway and sidewalk would be built to be raised about the level of the adjacent roadway. Bikeways adjacent to but separated from the roadway by some vertical element in Calif. are **Class IV Separated Bikeways, not Bike Lanes, Class II.**

A. Please consider installing Shared Lane Markings (Sharrows) in the general travel lanes on the bridge. People bicycling are not required to ride in Separated Bikeways and sometimes find it useful and safer to leave or even avoid using a Separated Bikeway. Shared Lane Markings' presence can remind people that bicycling may occur in the general travel lanes.

B. Please provide pavement markings, signs, or other means to inform people about the separation of people bicycling on the bikeway from people walking on the sidewalk.

4. Movements through the roadway intersections are shown to be controlled by traffic signals - Good.

A. On-demand signals should also be actuated by the presence of people bicycling in the bikeway and on the roadway, and by a push button actuation for pedestrians.

B. A leading pedestrian walk phase may be important depending on pedestrian/bicyclist volumes.

C. It may be safer for pedestrians and bicyclists to cross Camino del Rio North if the signs, signals, and other markings prohibited Right Turns On A Red Traffic Signal, especially when pedestrians or bicyclists are present going straight.

Thank you, SDSU, and the city for pursuing this project.

Jim Baross  
Board Member, League of American Bicyclists  
President, Calif. Assoc. of Bicycling Organizations  
Board Member, San Diego County Bicycle Coalition



Sender notified by  
Mailtrack





Paul Jackson &lt;pjackson@sdsu.edu&gt;

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**Re: Fenton Parkway Bridge Project & Normal Heights Community Planning Group**

1 message

---

**Paul Coogan** <ideabuzz@gmail.com>

Thu, Jun 8, 2023 at 1:54 PM

To: Paul Jackson &lt;pjackson@sdsu.edu&gt;

Cc: Elizabeth Spillane &lt;ekspillane@sdsu.edu&gt;, Gina Jacobs &lt;gina.jacobs@sdsu.edu&gt;, Gregory Stone &lt;gstone2124@gmail.com&gt;, Norma Stafford &lt;Norma@staffordconsultinggroup.com&gt;

Hi Paul,

Thank you for the very informative and professional presentation at our board meeting. I see Jim is in touch regarding bicycle aspects of the project.

I have copied Greg Stone and Norma Stafford as they are involved with Normal Heights Urban Arts and they may have some ideas on how art could be included in the project.

I would like to recommend seeking funding for artwork via the Cal Trans Clean California Grant Program. They have just finished Cycle 2 submissions but I imagine there will be more cycles and funding public art for this kind of project fits squarely with their mission. I am sure the Mission Valley Planning Group would be able to sponsor a submission.

<https://cleancalifornia.dot.ca.gov/local-grants>

Thanks,

Paul

**Paul Coogan**[ideabuzz@gmail.com](mailto:ideabuzz@gmail.com)

626 390-4190

*Put your good where it can do the most ~ Wavy Gravy*

---

**From:** Paul Jackson <pjackson@sdsu.edu>**Date:** Wednesday, May 31, 2023 at 9:32 AM**To:** Paul Coogan <ideabuzz@gmail.com>**Cc:** Elizabeth Spillane <ekspillane@sdsu.edu>, Gina Jacobs <gina.jacobs@sdsu.edu>**Subject:** Re: Fenton Parkway Bridge Project & Normal Heights Community Planning Group

Paul,

Thank you for your response and continued support of SDSU in Mission Valley. I would love to take you up on the offer and present at your meeting next week. I can keep it to 5 minutes with some time for questions if that works.

Please send me the zoom link and invitation.

Thanks,

**Paul Jackson DBIA**

Program Manager - Mission Valley Development

858-886-6883 (M)

**Error! Filename not specified.**  | Mission Valley

**Error! Filename not specified.**

On Fri, May 26, 2023 at 7:39 PM Paul Coogan <[ideabuzz@gmail.com](mailto:ideabuzz@gmail.com)> wrote:

Hi Paul,

I received your mail regarding public review of the Fenton Parkway Bridge Project. As chair of the Normal Heights Community Planning Group I added it to our agenda for the next board meeting on June 6<sup>th</sup> at 6PM.

I do not expect any concerns and can forward you any questions raised during the meeting. The agenda and minutes can also be found at <http://normalheightscpg.org>.

If you would like to present at the meeting, you have an open invitation. We meet in a hybrid format and presented in the past have joined via Zoom.

Thanks,

**Paul Coogan**

[ideabuzz@gmail.com](mailto:ideabuzz@gmail.com)

626 390-4190

*Put your good where it can do the most ~ Wavy Gravy*



Paul Jackson &lt;pjackson@sdsu.edu&gt;

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**NOP Fenton Parkway Bridge Project - request for extension**

1 message

**Eng, Anita** <anita\_eng@fws.gov>

Thu, Jun 8, 2023 at 1:22 PM

To: "pjackson@sdsu.edu" &lt;pjackson@sdsu.edu&gt;

Cc: "Lane, Jessie@Wildlife" &lt;Jessie.Lane@wildlife.ca.gov&gt;

Good afternoon Paul,

The U.S. Fish and Wildlife Service and California Department of Fish and Wildlife are preparing a joint letter in response to the Notice of Preparation of an Initial Study and Draft Environmental Impact Report for the Fenton Parkway Bridge Project. Due to schedule conflicts, we are unable to meet the June 20, 2023 deadline and are writing to request an extension. Please let us know if this can be accommodated; we would greatly appreciate it.

thank you,

Anita

**Anita Eng**

Fish and Wildlife Biologist

U.S. Fish and Wildlife Service

2177 Salk Avenue, Suite 250

Carlsbad, CA 92008

(571)547-3203\*

[anita\\_eng@fws.gov](mailto:anita_eng@fws.gov)

(she/her)

*\*Please email to schedule a call or meeting if needed.*



Paul Jackson &lt;pjackson@sdsu.edu&gt;

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**comments on the initial EIR for Fenton Parkway Bridge**

1 message

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**Jeffrey Davis** <jtrappdavis@gmail.com>  
To: pjackson@sdsu.edu

Wed, Jun 14, 2023 at 11:17 AM

Mr. Jackson,

I'm writing to share my comments on the initial EIR study of the proposed Fenton Parkway Bridge. My comments are likely outside of the focus for this feedback period, but I hope they'll be considered all the same.

First of all, I'm very glad to learn about this project. I've biked this area with my 13yo son and wished for a connection like this one. I think it will be a terrific improvement to the area. Mission Valley is in great need of more internal connections.

But not only that: more connections and fewer suburban arterials. I think this project would be greatly improved by removing the center turning lane. The center lane will increase speed on the bridge and induce more traffic. The center lane will also increase the construction and maintenance costs, increase the environmental impact, and adversely affect safety. I don't think there's any controversy about any of these assertions. It's my feeling that the benefit from the small increase in speed is far outweighed by the negative impacts of including a supplemental vehicle lane.

Though not part of an EIR, we should also consider the opportunity cost to the environment of spending an additional \$4mm (? , I'm guessing) in added construction cost for this net-negative supplemental lane versus other improvements that could be made with that money.

Thank you for including my comments and for your work on this valuable project. I'm looking forward to its completion.

Sincerely,

Jeffrey Davis, San Diego  
m) 619-549-7643



Paul Jackson &lt;pjackson@sdsu.edu&gt;

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**Fenton Parkway Bridge Project**

1 message

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**Zamora, Cherry@CATC** <Cherry.Zamora@catc.ca.gov>  
To: "pjackson@sdsu.edu" <pjackson@sdsu.edu>  
Cc: "Pennebaker, Laura@DOT" <Laura.Pennebaker@catc.ca.gov>

Thu, Jun 15, 2023 at 4:47 PM

Dear Paul Jackson:

The California Transportation Commission (Commission) has received the California State University's *Notice of Preparation of an Initial Study and Draft Environmental Impact Report—Fenton Parkway Bridge Project*. Commission staff do not have comments at this time.

For all projects that are anticipated to require Commission approval for discretionary actions, including route adoptions, new public road connections, or funding allocation requests, full compliance with the California Environmental Quality Act (CEQA) is required. The Commission will not allocate funds to projects for design, right-of-way, or construction, or approve route adoptions or new public road connections, until the environmental document is complete, and the Commission has approved the environmentally cleared project. The CEQA lead agency must contact and work with the Commission directly to ensure the final environmental document is brought forward to the Commission for action.

Regards,

Cherry Zamora

California Transportation Commission

(916) 654-4245 | [cherry.zamora@catc.ca.gov](mailto:cherry.zamora@catc.ca.gov)

## California Department of Transportation

DISTRICT 11  
4050 TAYLOR STREET, MS-240  
SAN DIEGO, CA 92110  
(619) 709-5152 | FAX (619) 688-4299 TTY 711  
[www.dot.ca.gov](http://www.dot.ca.gov)



June 19, 2023

11-SD-8, 15  
PM VAR  
Fenton Parkway Bridge Project  
NOP/IS/SCH#2023050534

Ms. Anne Collins-Doehne  
Director, Land Use Planning and Environmental Review  
The Board of Trustees of the California State University  
401 Golden Shore  
Long Beach, CA 90802

Dear Ms. Collins-Doehne:

Thank you for including the California Department of Transportation (Caltrans) in the environmental review process for the Notice of Preparation and Initial Study (NOP/IS) for the Fenton Parkway Bridge Project located near Interstate 8 (I-8) and Interstate 15 (I-15). The mission of Caltrans is to provide a safe and reliable transportation network that serves all people and respects the environment. The Local Development Review (LDR) Program reviews land use projects and plans to ensure consistency with our mission and state planning priorities.

Safety is one of Caltrans' strategic goals. Caltrans strives to make the year 2050 the first year without a single death or serious injury on California's roads. We are striving for more equitable outcomes for the transportation network's diverse users. To achieve these ambitious goals, we will pursue meaningful collaboration with our partners. We encourage the implementation of new technologies, innovations, and best practices that will enhance the safety on the transportation network. These pursuits are both ambitious and urgent, and their accomplishment involves a focused departure from the status quo as we continue to institutionalize safety in all our work.

We look forward to working with The Board of Trustees of the California State University to improve the transportation network and connections between various modes of travel, with the goal of improving the experience of those who use the transportation system.

Caltrans has the following comments:

### **Traffic Impact Study**

- A Vehicle Miles of Travel (VMT) based Traffic Impact Study (TIS) should be provided for this project. Please use the Governor's Office of Planning and Research Guidance to identify VMT related impacts.<sup>1</sup> Please include Caltrans ramps at the Texas Street/Qualcomm Way/I-8 and Fairmont Avenue/I-8/I-15 interchanges.
- Please provide a local mobility analysis, if available.
- The TIS may also need to identify the proposed project's near-term and long-term safety or operational issues, on or adjacent any existing or proposed State facilities.

### **System Planning**

- Comprehensive Multimodal Corridor Plans (CMCPs)
  - The South Bay to Sorrento CMCP lists proposed transportation solutions and projects for the study area. One such solution is bridge construction at Fenton Parkway, which includes the construction of a bridge to provide an alternate route from Fenton Parkway to Camino Del Rio N over the San Diego River during flooding. The proposed Fenton Parkway Bridge Project appears to fulfill the purpose of this solution.
  - The Kumeyaay Corridor CMCP is currently in progress, with expected completion in late 2023. This CMCP will present transportation solutions within the Kumeyaay Corridor study area, a two-mile-wide east-west corridor along I-8 from its western terminus at Nimitz Boulevard to Lake Jennings Park Road in Lakeside. Continued collaboration between Caltrans, SANDAG, and The Board of Trustees of the California State University/San Diego State University is recommended.
- VMT Reduction Opportunities
  - Transit: System Planning recommends moving the location of the MTS Route 18 Bus Stop from Mission City Parkway to Camino Del Rio N. Please consider implementing a bus-only lane on the bridge and incorporating a bus connection to Fenton Parkway Trolley Station.
- Please incorporate Americans with Disabilities Act (ADA) accessibility for the proposed bridge project into the draft EIR.
- Please confirm the proposed speed limit for the bridge.

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<sup>1</sup> California Governor's Office of Planning and Research (OPR) 2018. "Technical Advisory on Evaluating Transportation Impacts in CEQA." [https://opr.ca.gov/docs/20190122-743\\_Technical\\_Advisory.pdf](https://opr.ca.gov/docs/20190122-743_Technical_Advisory.pdf)

### **Complete Streets and Mobility Network**

Caltrans views all transportation improvements as opportunities to improve safety, access and mobility for all travelers in California and recognizes bicycle, pedestrian and transit modes as integral elements of the transportation network. Caltrans supports improved transit accommodation through the provision of Park and Ride facilities, improved bicycle and pedestrian access and safety improvements, signal prioritization for transit, bus on shoulders, ramp improvements, or other enhancements that promotes a complete and integrated transportation network. Early coordination with Caltrans, in locations that may affect both Caltrans, San Diego State University Mission Valley and the City of San Diego is encouraged.

To reduce greenhouse gas emissions and achieve California's Climate Change target, Caltrans is implementing Complete Streets and Climate Change policies into State Highway Operations and Protection Program (SHOPP) projects to meet multi-modal mobility needs. Caltrans looks forward to working with California State University (San Diego State University Mission Valley) and the City of San Diego to evaluate potential Complete Streets projects. Please coordinate with Caltrans for bike and pedestrian improvements on Mission City Parkway.

Bicycle, pedestrian, and public transit access during construction is important. Mitigation to maintain bicycle, pedestrian, and public transit access during construction is in accordance with Caltrans' goals and policies.

It is recommended for at least 42 inches bridge railing on both sides of the proposed bridge.

### **Environmental**

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

An encroachment permit will be required for any work within the Caltrans' R/W prior to construction. As part of the encroachment permit process, the applicant must provide approved final environmental documents for this project, corresponding technical studies, and necessary regulatory and resource agency permits. Specifically, CEQA determination or exemption. The supporting documents must address all environmental impacts within the Caltrans' R/W and address any impacts from avoidance and/or mitigation measures.



We recommend that this project specifically identifies and assesses potential impacts caused by the project or impacts from mitigation efforts that occur within Caltrans' R/W that includes impacts to the natural environment, infrastructure including but not limited to highways, roadways, structures, intelligent transportation systems elements, on-ramps and off-ramps, and appurtenant features including but not limited to fencing, lighting, signage, drainage, guardrail, slopes and landscaping. Caltrans is interested in any additional mitigation measures identified for the project's draft Environmental Document.

### **Wildfire**

Caltrans looks forward to reviewing the potential impacts related to an adopted emergency response plan or emergency evacuation plan and the further evaluation included in the Draft EIR. Since the installation and maintenance of this project could also exacerbate the impacts of wildfire in the project location Caltrans also looks forward to reviewing the proposed mitigation measures taken to reduce risk of wildfire during construction of this project.

### **Right-of-Way**

Per Business and Profession Code 8771, perpetuation of survey monuments by a licensed land surveyor is required, if they are being destroyed by any construction.

Any work performed within Caltrans' R/W will require discretionary review and approval by Caltrans and an encroachment permit will be required for any work within the Caltrans' R/W prior to construction.

Additional information regarding encroachment permits may be obtained by contacting the Caltrans Permits Office at (619) 688-6158 or emailing [D11.Permits@dot.ca.gov](mailto:D11.Permits@dot.ca.gov) or by visiting the website at <https://dot.ca.gov/programs/traffic-operations/ep>. Early coordination with Caltrans is strongly advised for all encroachment permits.

If you have any questions or concerns, please contact Kimberly Dodson, LDR Coordinator, at (619) 985-1587 or by e-mail sent to [Kimberly.Dodson@dot.ca.gov](mailto:Kimberly.Dodson@dot.ca.gov).

Sincerely,

*Hanwen Yi* P.E.  
Acting on behalf of

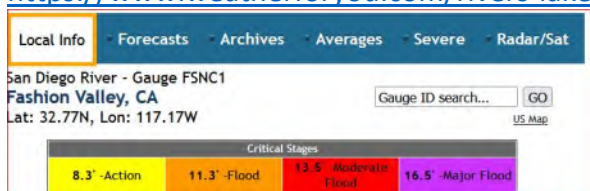
MAURICE A. EATON  
Branch Chief  
Local Development Review

**Michele Addington**  
**6371 Rancho Mission Road #7 San Diego CA 92108**  
**858 334 8019**  
**Comments due by June 20, 2023**

**Reference: Fenton Parkway Bridge Project**  
**Notice of Preparation of an Initial Study and Draft Environmental Impact Report**

Could the following be addressed in the EIR.

**SAN DIE GO RIVER FLOW IMPACT AFTER BRIGE COMPLETION:**  
<https://www.weatherforyou.com/rivers-lakes/san+diego-ca/FSNC1>



- At what level will the San Diego River be diverted to the “2 overflow drainage channels”?
- How would that impact the San Diego River waterflow downstream?
- Would water diverted to the “2 overflow drainage channels” be Naturally returned to the San Diego River when level at River returns to below (a) above?

**TRAFFIC:**

Trolley impact on traffic after Project construction:

- Will the EIR estimate the traffic impact on Fenton Parkway; River Park Road; Mission City Parkway and Camino Del Rio North due to Trolley stops at the Fenton Station?
- If yes will it measure the impact during Days; Nights; Weekends; Holidays; and special Day/Night/Weekend events at Snapdragon.
- Can Traffic impact be projected to reflect the Snapdragon

**SAFETY:**



- Will MTS be asked to install Barriers at their Fenton Trolley Station?

**Michele Addington**  
**6371 Rancho Mission Road #7 San Diego CA 92108**  
**858 334 8019**  
**Comments due by June 20, 2023**

**PARKING:**

Impact on Parking on Fenton Parkway during construction:

- a) Currently cars/trucks etc. can park on Fenton Parkway. During construction will these parking spots be removed?
- b) If yes, will these be returned to Parking after project completion?

**STAGING AREA(S):**

- a) Will the project require a Staging Area in the north part of the future bridge ie. by Ikea?
- b) If (a) yes, then what area will be affected and for how long?
- c) Current south staging area does not indicate the Traffic Light at Mission City Parkway & Camino Del Rio North. (figure 2 of the NOP Fenton Parkway Bridge Project). Could design show the all traffic lights.

**CONSTRUCTION:**

If Staging Area is south of the future bridge, then:

- a) Will the future South part of the Bridge be constructed 1<sup>st</sup>?
- b) If not, then what is the proposal for project Equipment Route?
- c) Note: Camino Del Rio South road is in very poor condition.
- d) Can EIR review Residential routes impact, should those be chosen: ie Rancho Mission Road/Ward Road.

**CONCRETE:**

- a) Will construction of Bridge require concrete hauled by trucks from the Mission George quarry?
- b) If yes, how many trucks per Day, per Hour, stating AM time, ending PM time
- c) If trucks hauling concrete will be used, then which Route in Mission Valley will be impacted? and why the particular route was chosen.
- d) If chosen route(s) impact Residential areas, how will this be communicated to them?

**SUICIDE PREVENTION NET:**

- a) Will the EIR evaluate the need of a suicide prevention Net to be installed on bridge?
- b) If not, why?



## SAN PASQUAL BAND OF MISSION INDIANS

### SAN PASQUAL RESERVATION

June 20, 2023

San Diego State University

RE: Fenton Parkway Bridge

Dear. Mr. Jackson,

The San Pasqual Band of Mission Indians Tribal Historic Preservation Office has received your notification of the project referenced above. This letter constitutes our response on behalf of Desiree M. Whitman THPO of the San Pasqual Band of Diegueno Indians.

We have consulted our maps and determined that the project as described is not within the boundaries of the recognized San Pasqual Indian Reservation. It is, however, within the boundaries of the territory that the tribe considers its Traditional Use Area (TUA). Furthermore, As the project progresses, we would like to engage in formal government-to-government consultation under AB-52 so that San Pasqual can have a voice in the development of the measures that will be taken to protect these sites and mitigate any adverse impacts. We would appreciate being given access to any cultural resource reports that have been or will be generated during the environmental review process so we can contribute most effectively to the consultation process.

We appreciate your 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 760-651-5142 or [angelinag@sanpasqualtribe.org](mailto:angelinag@sanpasqualtribe.org)

Sincerely,

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

#### TRIBAL COUNCIL

Stephen W. Cope  
Tribal Chairman

Victoria Diaz  
Vice Chair

Jenny Alto  
Secretary-Treasurer

Roberta Cameron  
Councilmember

Joyce L. Stein  
Councilmember

Fostering the protection and appreciation



of birds, other wildlife, and their habitats...

Mr. Paul Jackson  
SAN DIEGO STATE UNIVERSITY  
FACILITIES PLANNING, DESIGN, AND CONSTRUCTION  
5500 Campanile Drive  
San Diego, California 92182-1624  
via email: [pjackson@sdsu.edu](mailto:pjackson@sdsu.edu)

June 20, 2023

RE: SDAS Comments on the Fenton Parkway Bridge Initial Study

Dear Mr. Jackson,

The San Diego Audubon Society (SDAS) is a 3,000+ member non-profit organization with a mission to foster the protection and appreciation of birds, other wildlife, and their habitats, through education and study, and to advocate for a cleaner, healthier environment. We have been involved in conserving, restoring, managing, and advocating for wildlife and their habitat in the San Diego region since 1948.

San Diego Audubon Society offers these comments and concerns on the Initial Study with the hope that it will lead to an accurate environmental analysis and an Environmental Impact Report that adequately protects the very important natural resource value of the project area.

Our comments will be labeled using the relevant paragraph numbers and headings in the Initial Study.

### 2.1 Project Description and Existing Conditions

This section should mention that the San Diego River is a vital wildlife corridor and that it is part of the City's Multiple Habitats Protection Area and if any of the project area, or nearby areas that will be effected by the projects are mitigation sites for other project.

### 3.2 Agricultural and Forestry Resources

The project will cross a riparian forest. Construction activity will result in temporary major losses of the forest vegetation of that area, the wildlife that depend on it for habitat or for foraging, and the wildlife that use it as a corridor. After construction, the project will block sunlight to future vegetation in the area and reduce its value for forest vegetation and for the wildlife that depend on it or move through it. Much of the project area could end up as scrub vegetation instead of riparian forest because of that shading resulting in a permanent reduction in wildlife support value of the area under and to the East and the West of the project.

The project area may be zoned Open Space and not zoned Forest but it is still a forest. A significant portion of the forested area of our region is zoned Open Space or Regional Park and not Forest. The marking of items d) and e) in the Checklist are incorrect and must be changed to reflect that the project will result in a serious loss of forest land and will result in a conversion



of some forest land to non-forest use. An Initial Study is required to clearly communicate the entirety of the project and its effects. The miss-statements in the Check list and text of Section 3.2 fail to do that and could result in an inadequate Environmental Impact. Similarly, the text on page 22 should be changed to reflect that the project will, in fact, result in a serious impact to a forested area.

### 3.4 Biological Resources

The text discussing Biological Resources on page 25 does not seem to clearly communicate the entirety of the project and its impacts, as CEQA requires of an Initial Study. The following paragraphs are aspects of the project that should be communicated in the Initial Study to make sure they are fully addressed in the Environmental Impact Report.

**Habitat Fragmentation:** The most visible aspect of the Multiple Species Conservation Plan is that large area of preserved habitat. But, providing connectivity among habitat areas is also a major focus of that Plan. This project will seriously degrade a relatively narrow segment of the San Diego River, one of the most important wildlife corridors in our region. It will have impacts on all the wildlife that move along that corridor, not just the wildlife that reside in the project area. The shading from the project will seriously impact the trees that now provide shelter and forage for the wildlife that moves through the project area. Escaped lighting from the project will make the wildlife more vulnerable to nocturnal predators. Traffic noise will reduce the capability of wildlife to hear predators or to hear warning calls from other animals. These may well deter the movement of many species that would otherwise benefit from being able to use the project area as a corridor. Section 3.4 d) should provide much more emphasis on these serious impacts to connectivity and on the need to minimize and mitigate them in the EIR. The EIR should also address habitat continuity between the River and Murphy creek as well as East-West continuity along the River.

**Noise:** The noise section of this document relates mostly to impacts on humans. The noise from this project will put wildlife in the general area at risk in a few ways. It might drown out danger calls among animals of a family making them more vulnerable to predation. It might drown out mating calls. Either impact might cause animals to avoid the area which would reduce the area's wildlife support value. We urge that the EIR propose measures that will significantly reduce the radiated noise levels of the project in the frequency range of the relevant wildlife to help mitigate these impacts. Measures that might be considered are paving materials that would dampen or absorb the road sounds, sidewalks along the road edge designed to deflect the vehicle sounds upward, to reduce the amount that the vehicle noise would ensonify the habitat areas of the River, not allow vehicles which radiate high noise levels to use the bridge, limit the speed of vehicle on the bridge, give traffic light preference to vehicles leaving the bridge to reduce the number of vehicle having to idle on the bridge

**Escaped Lighting:** Light from the vehicles and the light fixtures will reach the habitat areas in the River. That lighting will make animals in the area more visible to predators at night which will



provide an unnatural advantage to a broad range of nocturnal predators. That will reduce the wildlife support value of the area from the predation and from prey animals avoiding using the area because of that risk. A drawing at the open house event showed the street lighting mounted on the outer wall of the pedestrian lanes of the project. That would allow an unnecessary amount of light to escape into the habitat area. We urge that the DEIR consider mounting the high intensity lighting on poles along the wall between pedestrian lanes and the road portion and bent directly over the road portion and directed downward. Lighting for the outer bike/pedestrian should be low intensity lighting mounted at very low heights on the outer wall of the bike/pedestrian lane, and directed away from the habitat areas. This would reduce the lighting from all of the lanes from having an impact on the wildlife of the region.

Also the intensity of light escaping upward should also be minimized to avoid distracting nocturnal migrating birds from their migrations. More information about avoiding this impact can be found by consulting the "Lights Out" program.

**Predator Perches:** The top of the outer walls of the bike/pedestrian lanes and other surfaces are likely to be used as perches for avian predators. This would give them an unnatural advantage over wildlife below them and reduce the wildlife support value of the area around the project. We urge that these rails and other potential predator perches in and under the project be precluded by installing deterrent measures that will prevent such perches and eliminate that potential impact of the project

**Bird Strike Prevention:** Many birds are killed when they attempt to cross too low over roads and bridges. This could especially significant in a case like this where the road is directly over a heavily used wildlife habitat area and corridor. We urge that the design of the bridge include measures to discourage birds from flying low over the traffic to minimize collisions between birds and vehicles. Also transparent fencing or windows along the outer wall of the pedestrian lane could cause bird strikes and should be avoided. Please use the most effective measures available to avoid, or at least significantly reduce the potential Bird Strike impact of the project.

**High Water Refuge:** The river bank, under the bridge will be a sloped rip-rap wall. The river bottom under the project will be fairly flat across the river bottom. That means that the entire bottom of the river is likely be covered with water during and after modest rain events. Terrestrial animals will need to move to the banks to avoid being either drowned or washed away from their home areas. We urge that the sloping rip-rap banks be covered with soil and fully covered with native vegetation to provide a high water refuge and to allow wildlife to be less visible to predators when using this area. Doing so would also improve the overall habitat, foraging, and corridor value of the project area somewhat.

**Potential Wildlife Benefit:** Swallows and bats frequently use bridges for nesting or roosting. It would be beneficial if appropriate portions of the concrete of the bridge would be textured in ways that would provide suitable attachment surfaces for native species. Perhaps the textured areas could be located so that students could monitor their use for education and research.



### 3.6 Energy

This section acknowledges that the construction of this project will result in the use of a lot of energy resources. It will also result in the discharge of a lot of Greenhouse Gasses (GHGs). The traffic of vehicles crossing this bridge for many decades will also discharge a lot of GHGs. We are told that the bridge will reduce the GHGs in the long term by making travel to the area much more efficient. That is a possibility, but decades of urban planning have shown that building new roads increases the amount of driving. The claim about GHG emissions cannot be verified without modeling results. It would be desirable if the DEIR would actually model, compute, and compare traffic in the area and the GHGs that would be discharged both with and without this bridge for the expected life span of the bridge. It would be appropriate to make a decision about this project based on its likely impact on Climate Change.

Similarly it would be worthwhile for the DEIR to model and assess the GHG discharge of traffic in the area if this bridge were built just for bike/pedestrian traffic instead of motor vehicles. The habitat and wildlife impacts could be dramatically less. Please assess the long term GHG impacts of all three of these alternatives as part of the Alternative Analysis portion of the DEIR.

### 3.8 Noise

The impact of noise on the wildlife in the habitat area around the project area and possible mitigation for it was addressed above in the section on Biological Resources.

### 3.10 Hydrology and Water Quality

The project will relocate and or extend existing storm drain infrastructure in the project area, including a 96-inch reinforced concrete pipe storm drain and a 54-inch storm drain to accommodate proposed bridge structure abutments. This is likely to change the stormwater flow in the area, so item 3.10 c on the Checklist should indicate that this is a Potentially Significant hydrology Impact. Construction involving the existing pipes could release contaminants remaining in those pipes resulting in a potentially significant water quality and wildlife impact.

Litter frequently flies up and out of open trucks. The concentration of litter is visible on the East side of many of the existing bridges over the River. The crossing cars will also drop fuel, lubricants, tire particles, etc. This project will bring these sources of contamination to this very environmentally sensitive portion of the River. Only some of these will be prevented by the planned water quality measures. These contaminants, measures to remove them, and their impacts on the wildlife support value of the River will be potentially significant and should be fully addressed in the EIR.



Fostering the protection and appreciation



of birds, other wildlife, and their habitats...

### 3.21 Mandatory Findings of Significance

Subsection 3.21 a. acknowledges that Section 3.4, Biological Resources, indicates that the project could have the potential to result in adverse impacts to biological resources, including quality of the environment, habitats, wildlife populations, plant or animal communities, and/or rare or endangered plant and animal species. However it does not address that the project will have adverse impacts to a broad range of wildlife that depend on the project area as a wildlife corridor. It also does not indicate that it is located in a relatively narrow section of one of the most important East-West wildlife corridors of our region. It has been identified as an essential corridor for the protection of biodiversity in our region by virtue of its inclusion in the MHPA. We urge that the impacts to wildlife movement that will result from this project also be addressed as a Finding of Significance.

We urge that the points presented in this comment letter be fully addressed by the DEIR and the recommendations be carefully considered to avoid, reduce, and/or mitigate the very significant impacts that could potentially result from this project.

Sincerely,

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

James A Peugh

SDAS Conservation Chair

### Fenton Parkway Bridge - Comments to 30% Plans and Type Selection

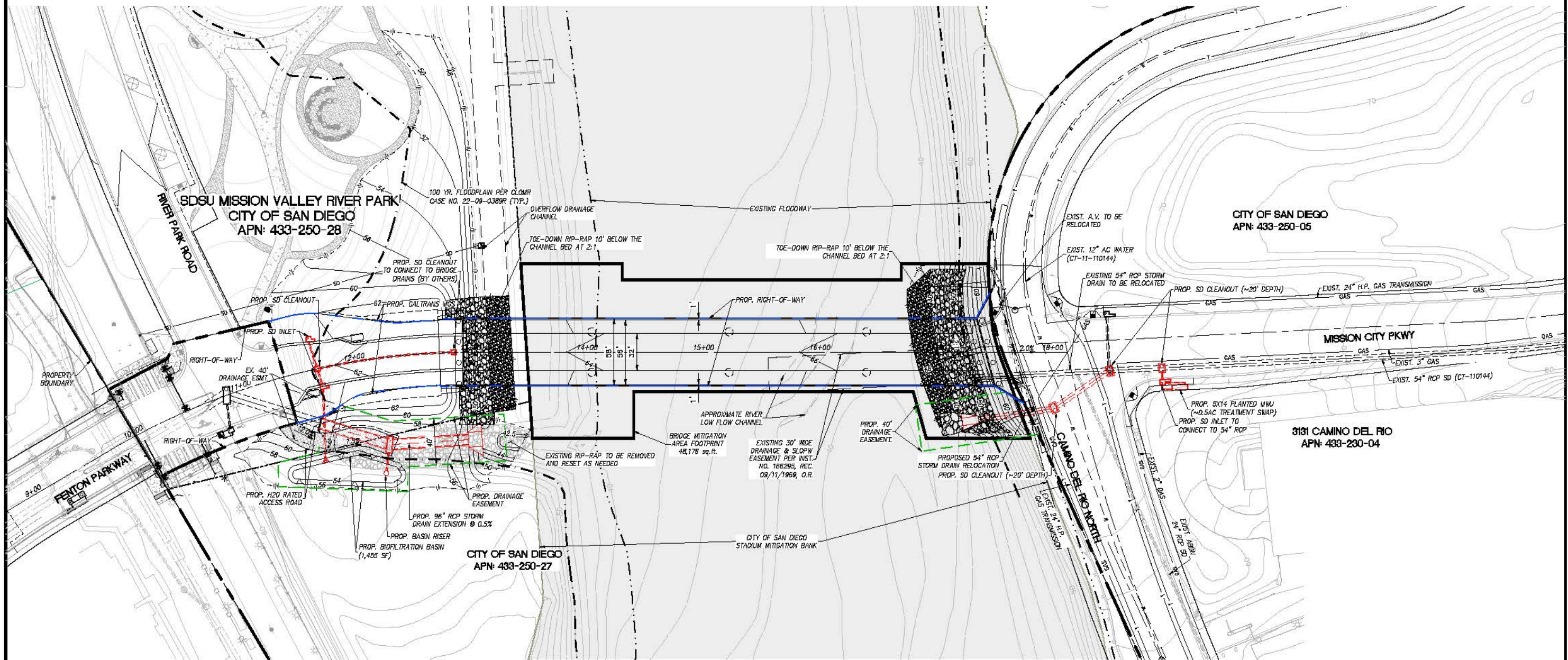
Name	Department	Comment	Response
Jakubauskas, Jerry	Engineering & Capital Projects	<ul style="list-style-type: none"> <li>-The only issue is the proposed use of on-bridge standard cobra head light fixtures mounted on concrete pedestals. Because the proposed bridge spans the San Diego River and MHPA, an alternative light standard that is shielded and directed onto the bridge deck with minimal to no spillover onto the SD River and MHPA will most likely be required by MSCP and/or resource agencies.</li> </ul>	
Gardiner, Maureen	Sustainability and Mobility Department	<ul style="list-style-type: none"> <li>-During flooding when no other roads that cross the river are passable (only the freeways) the statement about “alternate emergency roads are available” may not apply. In addition, during those times (flooding), or potentially during events the road may be operated with the center painted median as an additional travel lane.</li> <li>-7.3 Approach Slabs</li> <li>-No concrete approach slabs are proposed for the Fenton Parkway Bridge. Following the flow chart for</li> <li>-asphalt concrete approaches in Caltrans Memo to Designers 5-3 Attachment B:</li> <li>-This is not a multilane urbanized highway facility</li> <li>-Peak rock acceleration is less than 0.6g, but liquefaction and lateral spreading are seismic risks,</li> <li>-albeit mitigable using ground improvement</li> <li>-Alternate emergency roads are available</li> <li>-Therefore, concrete approach slabs are not necessary.</li> <li>-The intention is for this bridge to be an all-weather roadway so although it seems obvious that it exceeds typical flooding events in the valley, it would be worth mentioning what threshold it does meet or exceed on the plans and in the study. IE 100-year flood, 500-year, etc.</li> </ul>	
Forburger, Kristen	Planning Department	<ul style="list-style-type: none"> <li>-Lighting -All lighting within or adjacent to the MHPA is directed away/shielded from the MHPA, or limited to the immediate area and is in compliance with City Outdoor Lighting Regulations per LDC Section 14.2.0740.</li> <li>-Bridge construction shall be planned and scheduled to avoid avian nesting season of Federally endangered Least Bell's vireo as the area is currently occupied by the species. A Section 7 consultation and biological opinion will be required by USFWS. Project implementation shall avoid impacts to federally listed species.</li> <li>-The proposed project shall include analysis consistent with the City of San Diego Land Development Code Environmentally Sensitive Lands Essential Public Projects (EPP) Option:</li> <li>-Deviations from wetland requirements in ESL will be considered under the EPP Option when a proposed project(s) meets all the following criteria. The project must be an EPP (i.e., circulation element road, trunk sewer, water main) that will service the community at large and not just a single development project or property. The project must meet the definition of an EPP as identified in Section IV and must be essential in both location and need. If the City has options on the location of an EPP, the City should not knowingly acquire property for an EPP which would impact wetlands.</li> <li>-The proposed project and all biological alternatives, both practicable and impracticable shall be fully described and analyzed in an appropriate CEQA document. Alternatives to the proposed project shall be comprehensively included in the CEQA document (e.g., Mitigated Negative Declaration) and/or the biological technical report for the CEQA document. Alternatives must include the following: 1) a no project alternative; 2) a wetlands avoidance alternative, including an analysis of alternative sites irrespective of ownership; and 3) an appropriate range of substantive wetland impact minimization alternatives. Public review of the environmental document must occur pursuant to the provisions of CEQA.</li> <li>-The potential impacts to wetland resources shall be minimized to the maximum extent practicable and the project shall be the least environmentally damaging practicable biological alternative considering all the technical constraints of the project (e.g., roadway geometry, slope stability, geotechnical hazards, etc). Recognizing the wetland resources involved, minimization to the maximum extent practicable may include, but is not limited to, adequate buffers and/or designs that maintain full hydrologic function and wildlife movement (e.g., pipeline tunneling, bridging, Arizona crossings, arch culverts). The project applicant will solicit input from the U.S. Fish and Wildlife Service and the California Department of Fish and Wildlife (e.g., Wildlife Agencies) prior to the first public hearing.</li> </ul>	
Forburger, Kristen	Planning Department	<ul style="list-style-type: none"> <li>-The Board of Trustees of the California State University (CSU), which is the State of California acting in its higher education capacity, will be the lead agency for the preparation of an environmental impact report (EIR) in accordance with the California Environmental Quality Act (CEQA; Public Resources Code, Section 21000 et seq.) and Title 14 of the California Code of Regulations, Section 15000 et seq. (hereafter “CEQA Guidelines”).</li> <li>-City staff and California State University (CSU), acting on behalf of San Diego State University (SDSU), have negotiated a Memorandum of Understanding (MOU) regarding the Fenton Parkway Bridge pursuant to the terms of the Purchase and Sale Agreement (PSA) for the San Diego State University Mission Valley Campus.</li> <li>-Pursuant to a Memorandum of Understanding (MOU) between the CSU and the City, as well as City Ordinance No. O-21564, SDSU has agreed to plan, design, and construct the bridge to City transportation department design standards on behalf of the City.</li> <li>-In accordance with Section 3.0 City Ordinance No. O-21564, the City and SDSU coordination shall include the City ensuring the ability to make, review, and/or concur with any findings that are necessary or appropriate regarding the Project consistency with the City’s delegated authority under the Multiple Species Conservation Program (MSCP). Such findings may be substantially similar to those set forth in San Diego Municipal Code sections 126.0505(b)(c) Capital Improvement Project or public project with a wetland deviation pursuant to table 143-01A Applicability of Environmentally Sensitive Lands Regulations 143.0130, 143.0140, 143.0141, 143.0150, and 143.0305.</li> </ul>	

Forburger, Kristen	Planning Department	<p><b>CONSISTENCY WITH THE CITY OF SAN DIEGO MULTIPLE SPECIES CONSERVATION PROGRAM SUBAREA PLAN (MSCP SAP)</b></p> <p>1.The project site lies partially within the Multi-Habitat Planning Area (MHPA) of the City's MSCP. Please provide a map of the MHPA boundary on the project plans at the same scale as the project or a maximum scale of 1":200'.</p> <p>2.Please provide a Biological Technical Report (BTR) prepared pursuant to the City of San Diego "Guidelines for Conducting Biological Surveys" (2018). The report should include a map depicting biological resources and MHPA boundaries. MHPA Guidelines, as described in the MSCP Subarea Plan, that apply to the site and any management conditions that would apply to the areas conserved as MHPA/open space should also be discussed in the report and associated Environmental Impact Report (EIR).</p> <p>3.The project would result in impacts to wetland resources. The City's Biology Guidelines and MSCP Subarea Plan require that impacts to wetlands, including vernal pools, shall be avoided, and that a sufficient wetland buffer shall be maintained, as appropriate, to protect resource functions/values. (Coastal Zone 100-foot required). Where wetland impacts are unavoidable (determined case-by-case), they shall be minimized to the maximum extent practicable and fully mitigated per the Biology Guidelines.</p> <p>4.The biology report should include an analysis of on-site wetlands (including city, state and federal jurisdiction analysis) and, if present, include project alternatives that fully/substantially avoid wetland impacts. Detailed evidence supporting why there is no feasible, less environmentally damaging location or alternative to avoid any impacts must be provided for City staff review, as well as a mitigation plan that specifically identifies how the project is to compensate for any unavoidable impacts. Avoidance is the first requirement; mitigation can only be used for impacts clearly demonstrated to be unavoidable.</p> <p>5.The BTR shall include MSCP Consistency Analysis demonstrating proposed project consistency with Compatible Land Uses: MSCP SAP Section 1.4.1, General Planning Policies and Design Guidelines: MSCP SAP Section 1.4.2, Land use Adjacency Guidelines MSCP SAP Section 1.4.3, and General Management Directives: MSCP SAP Section 1.5.2</p> <p>6.MSCP Area Specific Management Directives (ASMD) Consistency Analysis – Species Specific Please include a section in the Biological Technical Report that provides a consistency analysis with the Area Specific Directives (conditions of coverage) for all MSCP Covered Species with a moderate to high potential of occurrence onsite. ASMDs can be found in Appendix A of the MSCP Subarea Plan.</p> <p>7.No impacts neither direct nor indirect shall result to the City of San Diego's Stadium Wetland mitigation site. The BTR shall include analysis demonstrating no impacts would result with project implementation.</p>
Forburger, Kristen	Planning Department	<p><b>LAND DEVELOPMENT CODE (LDC) ENVIRONMENTALLY SENSITIVE LANDS REGULATION (ESL) AND BIOLOGY GUIDELINES 2018: ESSENTIAL PUBLIC PROJECT</b></p> <p>8.The proposed project BTR and EIR shall include analysis of the City's LDC, ESL, and Biology Guideline wetland deviation for an essential public project. First, the determination of purpose and need as an essential public project shall be unequivocally demonstrated and supported by the City of San Diego. Include analysis and evidence reflecting the following in addition to full analysis under the Essential Public Projects (EPP) Option Deviations</p> <p>a.Wetland requirements in ESL will be considered under the EPP Option when a proposed project(s) meets all the following criteria. The project must be an EPP (i.e., circulation element road, trunk sewer, water main) that will service the community at large and not just a single development project or property. The project must meet the definition of an EPP as identified in Section IV of the Biology Guidelines and must be essential in both location and need.</p> <p>b.The proposed project and all biological alternatives, both practicable and impracticable shall be fully described and analyzed in an appropriate CEQA document. Alternatives to the proposed project shall be comprehensively included in the CEQA document (e.g., Mitigated Negative Declaration) and/or the biological technical report for the CEQA document. <b>Alternatives must include the following: 1) a no project alternative; 2) a wetlands avoidance alternative, including an analysis of alternative sites irrespective of ownership; and 3) an appropriate range of substantive wetland impact minimization alternatives.</b></p>
Malone, Rebecca	Planning Department	<p><b>Parks and Recreation Department – Laura Ball, Project Officer II – LBall@sandiego.gov, 619-685-1301</b></p> <p>·The Parks and Recreation Department manages the San Diego River Park parcel directly downstream of the project site. Please ensure that the environmental document addresses hydrology and any biological impacts to the parcel downstream.</p> <p><b>Public Utilities Department – Dirk Smith, Senior Planner – ddsmith@sandiego.gov, 858-614-5722</b></p> <p>·“Water for construction and street cleaning activities would be drawn from the City’s existing urban water supply, which consists of nine reservoirs that capture runoff from local watershed rainfall, three water treatment plants, and a small supply of local groundwater (City of San Diego 2021c).”</p> <p>·The City’s Public Utilities Department recommends removing this part of the sentence to simplify the explanation. Some reservoirs primarily receive imported water with very little from runoff.</p> <p><b>Sustainability &amp; Mobility Department – Emanuel Alforja, Associate Traffic Engineer – ealforja@sandiego.gov, 619-236-6883</b></p> <p>·We are in support of SDSU’s commitment to the Purchase and Sale Agreement (PSA) in moving forward with this needed project for the Mission Valley Community as well as for the City of San Diego as a whole. A high-water multimodal connection for the east side of Mission Valley will do much to aid the City’s Climate Action goals and provide emergency response options.</p> <p>·In Section 3.17, Transportation, of the Initial Study: The City has requested to review the Traffic Study scope of work. The Traffic Study should discuss how all modes are accommodated and discuss special events and flooding events.</p>

Infrastructure Construction Management Division		
Haynes, Jillian	Stormwater Department	<ul style="list-style-type: none"> <li>·Eliminate proposed CO on Camino del Rio North and straighten pipe run.</li> <li>·Angle proposed outfall adjacent to Camino del Rio North to flow downstream (addressed by comment #1)</li> <li>·If possible, angle proposed outfall adjacent to River Park Road to flow downstream</li> <li>·Confirm maintenance responsibility of proposed biofiltration basin</li> <li>·Provide maintenance access to proposed biofiltration basin</li> </ul>
Hauser, Everett	Transportation Department	<ul style="list-style-type: none"> <li>·Add cross green to area off of north bound ramp to intersection and add cross bike across intersection northbound across River Park Road</li> <li>·Remove flex posts and add cross green to top of T at southbound to bike ramp</li> <li>·Provide details on detectable warning surface between sidewalk and bikeway</li> <li>·Paint (or color concrete) Bike Lane green on sidewalk level</li> <li>·Add through bike lane adjacent to right turn lane for eastbound Camino Del Rio North</li> <li>·Remove two-stage bike box on eastbound Camino Del Rio North</li> </ul>
Alforja, Emanuel	Sustainability & Mobility Department	<ul style="list-style-type: none"> <li>·Page 3, for item #3 under permits/approvals that may be required from other agencies, please verify in the MOU the City's permitting department for construction in the ROW. Typically, Engineering &amp; Capital Projects or Development Services issue ROW permits for construction.</li> <li>Comments for the Initial Study</li> <li>·3.17 Transportation: The City has requested to review the Traffic Study scope of work. The Traffic Study should discuss how all modes are accommodated and discuss special events and flooding events.</li> </ul>







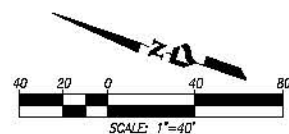
**EARTHWORK QUANTITIES (CY)**

CUT 200  
 FILL 13,600  
 NET 13,400 (FILL)

**EARTHWORK NOTE:** QUANTITIES ARE PRELIMINARY AND PRIOR TO COMPLETE GEOTECHNICAL INVESTIGATION.

**RIP-RAP LEGEND:**

- BURIED FACING CLASS RIP-RAP (75LB, D50=1.0 FEET), RIP RAP TO BE 1.5 THICK OVER EITHER 3/4" GRAVEL (1" THICK) FILTER BLANKET OR PER GEOTECHNICAL RECOMMENDATION.
- FACING CLASS RIP-RAP (75LB, D50=1.0 FEET), RIP RAP TO BE 1.5 THICK OVER EITHER 3/4" GRAVEL (1" THICK) FILTER BLANKET OR PER GEOTECHNICAL RECOMMENDATION.
- SD OUT-FALL RIP-RAP ENERGY DISSIPATOR PER SD0-104.
- EXISTING RIP-RAP TO BE REMOVED AND REPLACED AS NEEDED.



**PROJECT DESIGN CONSULTANTS**  
 Planning | Landscape Architecture | Engineering | Survey  
 701 B Street, Suite 800 San Diego, CA 92101  
 619.235.6471 Tel 619.234.0340 Fax



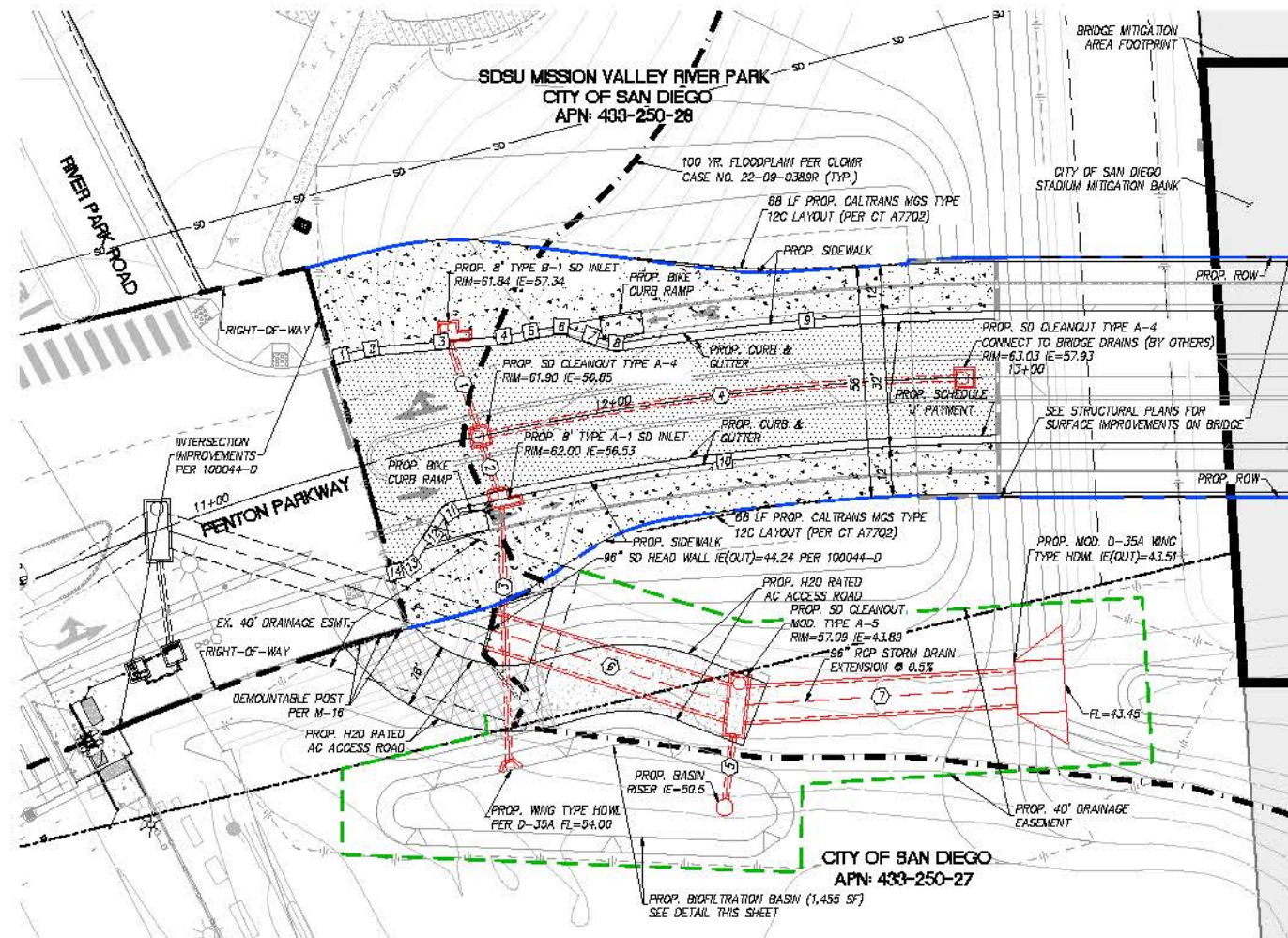
MARTIN J. JONES, R.C.E. 78492 DATE DESIGNED BY: TAA

WARNING 		<b>MASS GRADING PLAN FOR:</b>  <b>FENTON PARKWAY BRIDGE</b> <b>OVER SAN DIEGO RIVER</b> FENTON PARKWAY BETWEEN RIVER PARK RD & CAMINO DEL RIO NORTH																									
DEVELOPMENT SERVICES DEPARTMENT SHEET XX OF XX SHEETS		PMT NO. _____ PRJ NO. XXXXXXX																									
APPROVED: FOR CITY ENGINEER _____ DATE _____		XXXX-XXXX NAD83 COORDINATES																									
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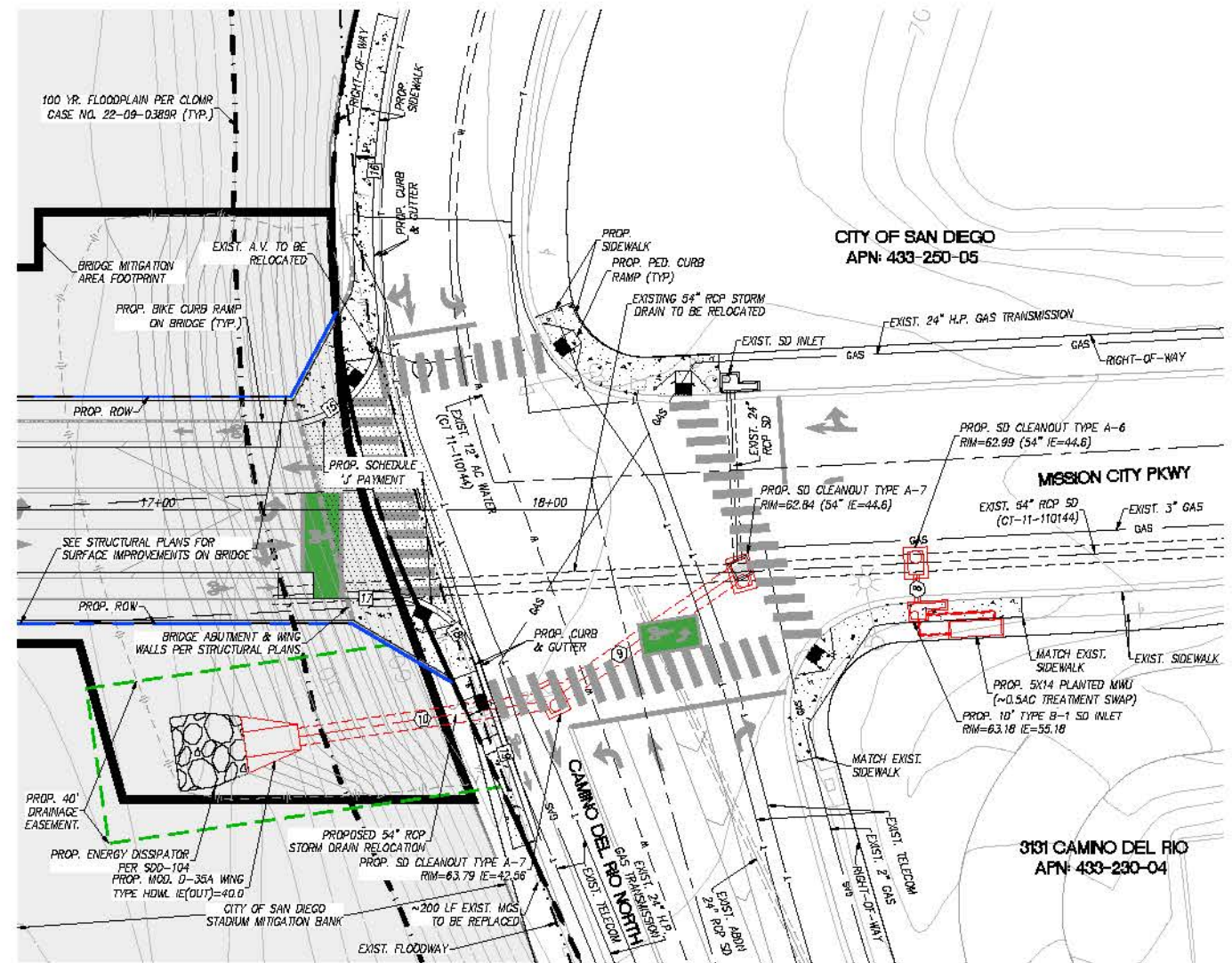
30% PLAN(S) - NOT FOR CONSTRUCTION







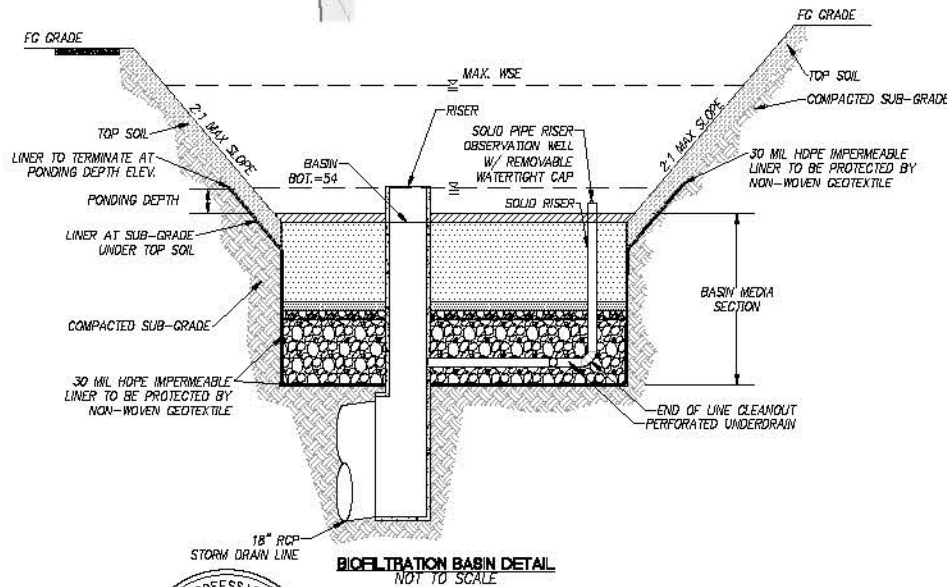
**PLAN: FENTON PARKWAY (NORTH)**  
SCALE: 1" = 20'



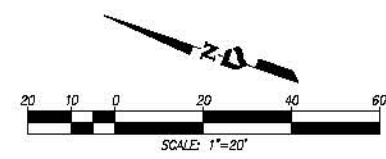
**PLAN: FENTON PARKWAY (SOUTH)**  
SCALE: 1" = 20'

NO	BEARING/DELTA	RADIUS	LENGTH	NOTE
1	N 53D7'36" E	--	22.51'	18" RCP
2	N 53D7'36" E	--	11.80'	18" RCP
3	N 68D5'47" E	--	81.90'	18" RCP
4	Δ=10'44'16"	610.00'	114.32'	18" RCP
5	N 77'40'44" E	--	15.85'	18" RCP
6	N 01'59'27" W	--	60.04'	96" RCP
7	N 22'40'37" W	--	65.60'	96" RCP
8	N 68'00'00" E	--	7.37'	18" RCP
9	N 53'29'54" W	--	53.82'	54" RCP
10	N 27'16'38" W	--	63.66'	54" RCP

NO	BEARING/DELTA	RADIUS	LENGTH	REMARKS
1	Δ=00'29'00"	637.00'	4.63'	6" TYPE "H" C&G
2	Δ=09'58'38"	60.00'	10.46'	6" TYPE "H" C&G
3	N 23'55'07" W	--	23.58'	6" TYPE "H" C&G
4	Δ=06'19'58"	60.00'	6.63'	6" TYPE "H" C&G
5	Δ=00'36'43"	632.50'	6.76'	6" TYPE "H" C&G
6	Δ=28'27'05"	8.00'	3.97'	6" TYPE "H" C&G
7	N 00'59'51" W	--	11.24'	6" TYPE "H" C&G
8	Δ=27'04'24"	3.00'	1.42'	6" TYPE "H" C&G
9	Δ=08'21'49"	626.00'	91.38'	6" TYPE "H" C&G
10	Δ=12'43'07"	594.00'	131.86'	6" TYPE "H" C&G
11	Δ=42'51'56"	3.00'	2.24'	6" TYPE "H" C&G
12	N 75'06'58" W	--	11.93'	6" TYPE "H" C&G
13	Δ=41'53'37"	8.00'	5.85'	6" TYPE "H" C&G
14	Δ=00'16'43"	583.00'	2.84'	6" TYPE "H" C&G
15	Δ=83'45'54"	25.00'	36.55'	6" TYPE "H" C&G
16	Δ=23'45'50"	221.06'	76.03'	6" TYPE "H" C&G
17	N 19'04'34" W	--	8.56'	6" TYPE "H" C&G
18	Δ=71'10'52"	25.00'	31.06'	6" TYPE "H" C&G
19	N 52'06'18" E	--	47.80'	6" TYPE "H" C&G



**NOTE:**  
FOR PROPOSED SIGNING AND STRIPING, SEE FENTON PARKWAY BRIDGE STRIPING CONCEPT.



**PROJECT DESIGN CONSULTANTS**  
Planning | Landscape Architecture | Engineering | Survey  
701 B Street, Suite 800 San Diego, CA 92101  
619.235.6471 Tel 619.234.0340 Fax

REGISTERED PROFESSIONAL ENGINEER  
MARTIN J. JONES  
No. 78492  
CIVIL  
STATE OF CALIFORNIA

MARTIN J. JONES, R.C.E. 78492 DATE DESIGNED BY TAA

PRIVATE CONTRACT

IMPROVEMENT PLAN FOR:  
**FENTON PARKWAY BRIDGE OVER SAN DIEGO RIVER**  
FENTON PARKWAY BETWEEN RIVER PARK RD & CAMINO DEL RIO NORTH

DEVELOPMENT SERVICES DEPARTMENT  
SHEET XX OF XX SHEETS

APPROVED: \_\_\_\_\_ DATE \_\_\_\_\_  
FOR CITY ENGINEER \_\_\_\_\_ DATE \_\_\_\_\_

DESCRIPTION	BY	APPROVED	DATE
ORIGINAL	PDC		

AS BUILTS \_\_\_\_\_ DATE STARTED \_\_\_\_\_  
CONTRACTOR \_\_\_\_\_ DATE COMPLETED \_\_\_\_\_  
INSPECTOR \_\_\_\_\_

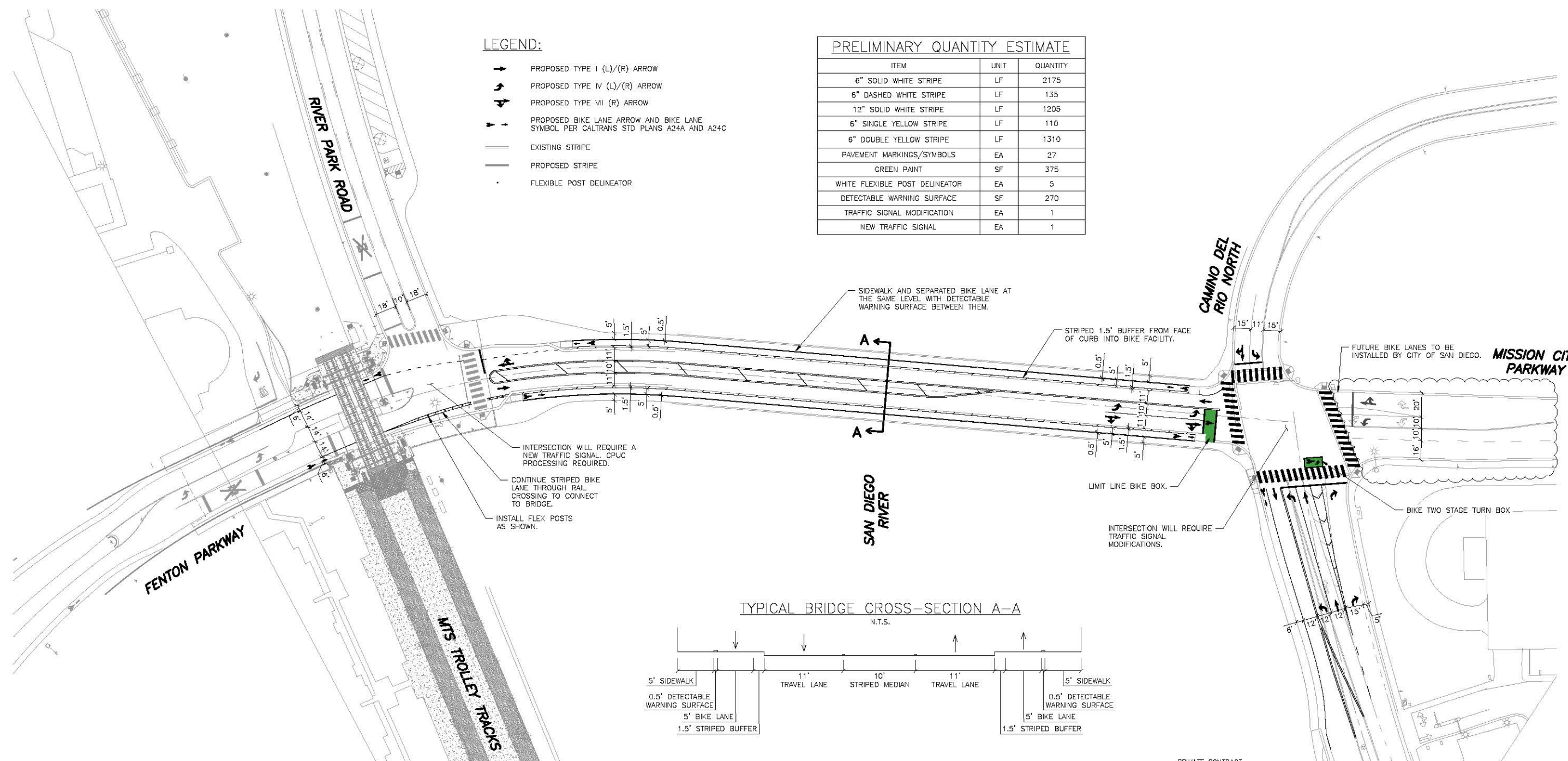
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PRJ NO. XXXXXXX  
XXXX-XXXX NAD83 COORDINATES  
XXXX-XXXX LAMBERT COORDINATES  
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30% PLAN(S) - NOT FOR CONSTRUCTION

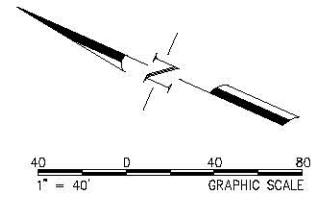
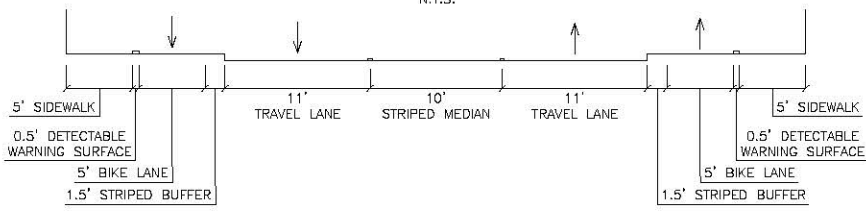


- LEGEND:**
- ➔ PROPOSED TYPE I (L)/(R) ARROW
  - ➔ PROPOSED TYPE IV (L)/(R) ARROW
  - ➔ PROPOSED TYPE VII (R) ARROW
  - ➔ PROPOSED BIKE LANE ARROW AND BIKE LANE SYMBOL PER CALTRANS STD PLANS A24A AND A24C
  - EXISTING STRIPE
  - PROPOSED STRIPE
  - FLEXIBLE POST DELINEATOR

PRELIMINARY QUANTITY ESTIMATE		
ITEM	UNIT	QUANTITY
6" SOLID WHITE STRIPE	LF	2175
6" DASHED WHITE STRIPE	LF	135
12" SOLID WHITE STRIPE	LF	1205
6" SINGLE YELLOW STRIPE	LF	110
6" DOUBLE YELLOW STRIPE	LF	1310
PAVEMENT MARKINGS/SYMBOLS	EA	27
GREEN PAINT	SF	375
WHITE FLEXIBLE POST DELINEATOR	EA	5
DETECTABLE WARNING SURFACE	SF	270
TRAFFIC SIGNAL MODIFICATION	EA	1
NEW TRAFFIC SIGNAL	EA	1



TYPICAL BRIDGE CROSS-SECTION A-A  
N.T.S.



**FEHR PEERS**  
 555 West Beech Street Suite 302 San Diego, CA 92101  
 (619) 234-3190



PRIVATE CONTRACT

**WARNING**  
 0 1/2 1  
 IF THIS BAR DOES NOT MEASURE 1" THEN DRAWING IS NOT TO SCALE.

**SIGNING AND STRIPING PLAN FOR:**  
**FENTON PARKWAY BRIDGE**  
 OVER SAN DIEGO RIVER  
 FENTON PARKWAY BETWEEN RIVER PARK RD & CAMINO DEL RIO NORTH

DEVELOPMENT SERVICES DEPARTMENT  
 SHEET XX OF XX SHEETS

PMT NO. \_\_\_\_\_  
 PRJ NO. XXXXXX

APPROVED: \_\_\_\_\_ DATE \_\_\_\_\_  
 FDR CITY ENGINEER DATE

DESCRIPTION	BY	APPROVED	DATE
ORIGINAL	FP		

XXXX-XXXX NAD83 COORDINATES  
 XXXX-XXXX LAMBERT COORDINATES

DRAWING NO. CXX  
 XXXXXX-XX-D

AS BUILTS \_\_\_\_\_ DATE STARTED \_\_\_\_\_  
 CONTRACTOR \_\_\_\_\_ DATE COMPLETED \_\_\_\_\_  
 INSPECTOR \_\_\_\_\_

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# County of San Diego

**AMY HARBERT**  
DIRECTOR

DEPARTMENT OF ENVIRONMENTAL HEALTH AND QUALITY  
**VECTOR CONTROL PROGRAM**

**HEATHER BUONOMO, REHS**  
DIRECTOR OF ENVIRONMENTAL HEALTH

5570 OVERLAND AVENUE, SUITE 102, SAN DIEGO, CA 92123  
Phone: (858) 694-2888 Fax: (858) 505-6786  
www.SDVector.com

June 29, 2023

Paul Jackson, Program Manager  
San Diego State University  
Facilities Planning, Design, and Construction  
5500 Campanile Drive  
San Diego, CA 92182-1624

Via e-mail: [pjackson@sdsu.edu](mailto:pjackson@sdsu.edu)

## COMMENTS ON THE DRAFT ENVIRONMENTAL IMPACT REPORT FOR THE FENTON PARKWAY BRIDGE PROJECT

Dear Mr. Jackson:

Thank you for the opportunity to comment on the draft Environmental Impact Report for the above referenced project. The County of San Diego Vector Control Program (VCP) is responsible for the protection of public health through the surveillance and control of mosquitoes that are vectors for human disease including West Nile virus (WNV). The VCP has completed their review and has the following comments regarding the proposed project.

1. The VCP respectfully requests that the draft Environmental Impact Report address potential impacts from possible mosquito breeding sources created by the project and that the project be designed and constructed in a manner to minimize those impacts. Specifically, ensure construction-related depressions created by grading activities, vehicle tires, and excavation do not result in depressions that will hold standing water. In addition, ensure drains, BMPs, and other structures do not create a potential mosquito breeding source. Any area that is capable of accumulating and holding at least ½ inch of water for more than 96 hours can support mosquito breeding and development. Finally, if habitat remediation is required for the project, the design should be consistent with guidelines for preventing mosquito habitat creation.
2. Please note, the VCP has the authority pursuant to state law and County Code to order the abatement of any mosquito breeding that does occur either during construction or after the project is completed that is determined to be a vector breeding public nuisance. The VCP will exert that authority as necessary to protect public health if the project is not designed and constructed to prevent such breeding.

Mr. Jackson  
June 29, 2023  
San Diego State University

3. For your information, the County of San Diego Guidelines for Determining Significance for Vectors can be accessed at [http://www.sandiegocounty.gov/content/dam/sdc/pds/docs/vector\\_guidelines.pdf](http://www.sandiegocounty.gov/content/dam/sdc/pds/docs/vector_guidelines.pdf) and the California Department of Public Health Best Management Practices for Mosquito Control in California is available at <https://www.cdph.ca.gov/Programs/CID/DCDC/Pages/MosquitoesandMosquitoBorneDiseases.aspx#>

The VCP appreciates the opportunity to participate in the environmental review process for this project. If you have any questions regarding these comments, please contact Daniel Valdez at 858-688-3722 or by e-mail at [Daniel.Valdez@sdcounty.ca.gov](mailto:Daniel.Valdez@sdcounty.ca.gov).

Sincerely,



DANIEL VALDEZ, Registered Environmental Health Specialist  
Vector Control Program



U.S. FISH AND WILDLIFE SERVICE  
Carlsbad Fish and Wildlife Office  
2177 Salk Avenue, Suite 250  
Carlsbad, California 92008



CALIFORNIA DEPARTMENT OF  
FISH AND WILDLIFE  
South Coast Region  
3883 Ruffin Road  
San Diego, California 92123

In Reply Refer to:  
FWS/CDFW-23-0090700-CEQA\_SD

July 14, 2023  
*Sent Electronically*

Paul Jackson, Program Manager  
San Diego State University  
Facilities Planning, Design, and Construction  
5500 Campanile Drive  
San Diego, California 92182-1624  
pjackson@sdsu.edu

Subject: Joint Response to the Notice of Preparation of an Initial Study and Draft  
Environmental Impact Report for the Fenton Parkway Bridge Project  
(SCH#2023050534)

Dear Paul Jackson:

The U.S. Fish and Wildlife Service (Service) and the California Department of Fish and Wildlife (CDFW), jointly the Wildlife Agencies, have reviewed the Notice of Preparation (NOP) of an Initial Study and Draft Environmental Impact Report for the Fenton Parkway Bridge Project (project). The comments provided in this letter are based on information provided in the Initial Study and NOP; our review and comments (FWS-SD-2133.2, dated August 17, 2001) on the Draft Environmental Impact Report (LDR No. 40-0559; SCH No. 2000101088) for the Mission City Parkway Bridge and Associated Facilities (2001 DEIR); our review and comments (FWS/CDFW-19B0115-19TA0706, dated March 28, 2019) on the Draft Programmatic Environmental Impact Report for the Mission Valley Community Plan (MVCP) Update (SCH# 2017071066) (2019 DPEIR); the San Diego State University Mission Valley Campus Master Plan Draft Environmental Impact Report (2019 DEIR); our knowledge of sensitive and declining species and their habitats in the region; and our participation in regional conservation planning efforts, including the City of San Diego's (City) Multiple Species Conservation Program Subarea Plan (SAP). We appreciate the extension San Diego State University (SDSU) granted the Wildlife Agencies for comments on the NOP.

The mission of the Service is working with others to conserve, protect, and enhance fish, wildlife, plants, and their habitats for the continuing benefit of the American people. The Service also has the legal responsibility for the welfare of migratory birds, anadromous fish, and threatened and endangered animals and plants occurring in the United States. The Service also is responsible for administering the Federal Endangered Species Act of 1973, as amended (16 U.S.C. 1531 et seq.), including habitat conservation plans (HCP) developed under section 10(a)(2)(A) of the Act. The CDFW is a Trustee Agency and a Responsible Agency pursuant to the California Environmental Quality Act (CEQA; §§ 15386 and 15381, respectively) and is

responsible for ensuring appropriate conservation of the State's biological resources, including rare, threatened, and endangered plant and animal species, pursuant to the California Endangered Species Act (CESA; Fish and Game Code § 2050 *et seq.*) and other sections of the Fish and Game Code. CDFW also administers the Natural Community Conservation Planning (NCCP) program. The City of San Diego participates in the HCP and NCCP programs by implementing its approved SAP.

SDSU, an entity of the Board of Trustees of the California State University (CSU), will serve as the CEQA Lead Agency for this Project on behalf of the City. As described in a Memorandum of Understanding between CSU and the City, as well as City Ordinance No. O-21564, SDSU will design, plan, and construct the bridge to City Standards. SDSU and the City will share the cost of the project, and the City will assume operation and maintenance obligations upon completion. The Initial Study indicates that the City will serve as a Responsible Agency under CEQA, and SDSU is responsible for securing all environmental permits required from State and Federal agencies.

### **Biological Importance of the San Diego River and Relationship to the City's SAP**

The project site is at the same location as the bridges previously proposed in the 2001 DEIR and 2019 PDEIR within the City's MVCP area north of Interstate 8, between Interstates 805 and 15, and southwest of Snapdragon Stadium. The proposed bridge will span the San Diego River, which is in the City's Multi-Habitat Planning Area (MHPA or preserve) and adjacent to the City's Stadium Wetland Mitigation Site. The bridge will be 450 feet long and 58 feet wide and connect the southern terminus of Fenton Parkway to the northern terminus of Mission City Parkway at the intersection of Camino Del Rio North. The bridge will be supported by concrete seat-type abutments in the river embankments at each end, and two to three piers within the river channel, each consisting of two to three approximately 20-foot-tall, 6-foot-diameter circular concrete columns. The existing storm drain infrastructure in the area will require relocation and/or extension to accommodate bridge construction.

The San Diego River is an important component of the MHPA. The relative lack of channelization and remaining riparian vegetation in the San Diego River benefit a myriad of wildlife species in the San Diego area. As the 2001 DEIR stated, "The importance of San Diego River habitat should not be underestimated.... The linear riparian habitats along the San Diego River provide the only remaining wetland habitat within the urbanized area of Mission Valley, and thus contribute heavily to localized biological diversity and provide shelter for migrating species (primarily birds)." At the time of the 2001 DEIR, the habitat in and adjacent to the proposed project site consisted of high-quality southern cottonwood willow riparian forest, coastal and valley freshwater marsh, and open water. The area also supported high biological functions due to its perennial flows, mature vegetation, high wildlife diversity, and high regional wildlife value. Since the evaluation done for the 2001 DEIR, wetland restoration and enhancement done for the Stadium Wetland Mitigation Site has increased the quality and value of the habitat adjacent to the project site, and the mitigation site has been and/or will be used to mitigate wetland impacts for other projects.



The proposed project site plays a significant role in wildlife breeding and wintering. In addition to the federally and State endangered least Bell's vireo (*Vireo bellii pusillus*; vireo), numerous other migratory avian species use the site, including yellow warbler (*Dendroica petechia brewsteri*), yellow-breasted chat (*Icteria virens auricollis*), and Cooper's hawk (*Accipiter cooperii*), which are all State Species of Special Concern (CSC). Several subspecies of willow flycatcher migrate through the San Diego River watershed, and it is possible that the southwestern willow flycatcher (*Empidonax traillii extimus*; flycatcher) occurs on site as a short-term migrant species. Among species that potentially use the area as a stop-over or nesting area are common yellowthroat (*Geothlypis trichas*), red-winged blackbird (*Agelaius phoeniceus*), marsh wren (*Cistothorus palustris*), yellow-rumped warbler (*Dendroica coronata*), waterfowl such as mallards and grebes, and raptor species such as white-tailed kite (*Elanus leucurus*). The site also provides year-round habitat for amphibian, reptile, and mammal species, serving as a local wildlife corridor allowing movement of resident animals within their home range and dispersal of individuals into riparian habitats beyond the area. The biological functions provided by the San Diego River, and its support of listed and sensitive species, are why the riparian corridor is within the City's MHPA.

The Department seeks mutual cooperation with the Regional Board in solving water quality problems. In addition to its status under the MHPA, the San Diego River has been designated by the Regional Water Quality Control Board (Regional Board) as providing several beneficial uses including, but are not limited to, "warm freshwater habitat," "cold freshwater habitat," "wildlife habitat," and "rare, threatened, or endangered species" for portions of the San Diego River, including the reach downstream from the proposed project.

### **Likely Effects of Proposed Project**

The 2001 DEIR identified the local and regional biological importance of the San Diego River and concluded: "an increase in fragmentation and corresponding increase in edge habitat could have substantial adverse effects to local wildlife. In the event that such fragmentation results in the conversion of a habitat source to a sink, the deleterious effects could be far reaching." The 2001 DEIR also stated: "The proposed bridge would impact the local movement wildlife corridor at a single crossing. Significant indirect impacts to the wildlife corridor, as a result of construction, and permanent significant impacts associated with increased volumes of human and vehicular traffic, increased illumination, and potential increases in noise would also result." Further, the 2001 DEIR stated: "even with the implementation of mitigation measures, cumulatively significant impacts associated with the loss of wetland on a regional level would remain significant and unmitigated".

Among the species that could be affected by the proposed bridge are the vireo and other sensitive birds. The riparian habitat in the San Diego River in and adjacent to the project site was known to be occupied by vireo in 2001 when the DEIR was completed. Protocol vireo surveys in 2017 found a single male vireo in the channel that extends south of Fenton Parkway and a vireo pair in the San Diego River adjacent to the channel, and surveys in 2019 found 2 single vireos in the same channel and adjacent area in the San Diego River (Dudek 2017, 2019). In addition, three vireo pairs were found in the San Diego River adjacent to the SDSU Campus Master Plan project

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site during surveys in 2020 (Kus 2020). Therefore, the riparian area in the channel that extends south of Fenton Parkway may be part of a breeding territory of one vireo pair, and the San Diego River adjacent to the project site may support additional vireo pairs during their nesting season. The past and current use by vireo demonstrates the biological value of the project site, and use of the area by vireo and other avian species would be substantially impacted by the proposed project.

The bridge may reduce or eliminate the use of the area by these species because of the additional break in habitat and the associated increase in edge effects such as noise, artificial light, increased human intrusion, and traffic. The edge effects would potentially disrupt avian foraging and nesting behavior. Additional fragmentation may also lead to or increase brood parasitism by the brown-headed cowbirds (*Molothrus ater*, cowbird) in the project area and/or nest predation by the meso-predators in the area (gray fox, raccoon, and striped skunk) or raptors that perch on the bridge. Vireo and other birds flying over the bridge may also collide with vehicles. Overall, it appears that the proposed bridge at Fenton Parkway across the San Diego River would result in significant biological impacts including to adjacent areas in the Stadium Wetland Mitigation Site that have or will be used as mitigation for other projects.

Based on the above and as stated in our comments on the 2001 DEIR and 2019 DPEIR, we have concerns about the significant biological impacts from the removal of habitat and the additional fragmentation that the proposed bridge would cause to MHPA habitat in the San Diego River.

### **Consistency with the City's SAP**

The City's Biology Guidelines for implementing the SAP state that impacts to wetlands should be avoided and minimized to the maximum extent practicable. In addition, the SAP conditions for coverage for vireo and flycatcher require specific measures to protect against detrimental edge effects to these species.

The City's Biology Guidelines require a deviation for projects that propose wetland impacts. While there is a deviation option for essential public projects (EPP), the project must be essential in both location and need. Based on traffic analysis in the 2001 DEIR, construction of the Mission City Parkway Bridge at this location did not appear necessary and other alternatives were available with lesser biological impacts including the retrofit of existing bridges at Mission Center Road, Camino del Este, Ward Road, or Stadium Way. On May 28, 2002, the City Council and mayor voted unanimously to deny the permit for the Mission City Parkway Bridge because it "could result in maximum disturbance to environmentally sensitive lands" and "increase the alteration of natural landforms which would result in undue risks." Further, they did "not believe that the proposed development is consistent with the City of San Diego's MSCP Subarea Plan," and "would contribute to increase in water quality degradation in an already impaired water body." In addition, the 2019 DPEIR identified a biologically superior alternative (i.e., Alternative 1) that would not include a bridge for Fenton Parkway across the San Diego River. Finally, the more recent 2019 DEIR also concluded that a bridge for Fenton Parkway "is not required to reduce significant project [transportation-related] impacts and the project's impacts

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can be reasonably mitigated with physical and other improvements without the bridge in place.” Based on the above, it does not appear that the proposed project would qualify for an EPP deviation or be consistent with the City’s SAP. Therefore, we strongly recommend that SDSU and the City adopt an alternative that does not cross the San Diego River and thereby avoids and minimizes wetland impacts and detrimental edge effects to the vireo and flycatcher to the maximum extent practicable to be consistent with the City’s SAP.

Thank you for the opportunity to comment on the NOP. Additional specific comments on the NOP are enclosed. We are available to meet with SDSU and the City if you have any questions regarding this letter or would like to discuss potential approaches to addressing our comments. To coordinate with the Wildlife Agencies on this project, please contact Jessie Lane of CDFW at [Jessie.Lane@wildlife.ca.gov](mailto:Jessie.Lane@wildlife.ca.gov), or Anita Eng of the Service at [Anita\\_Eng@fws.gov](mailto:Anita_Eng@fws.gov).

Sincerely,

**JONATHAN  
SNYDER**

Jonathan D. Snyder  
Assistant Field Supervisor  
U.S. Fish and Wildlife Service

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Enclosure

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## **References**

Dudek. 2017. Focused Least Bell's Vireo Survey Report for the Stadium Wetland Mitigation Project, San Diego, California. 16 pp.

Dudek. 2019. Focused Least Bell's Vireo and Southwestern Willow Flycatcher Survey Report for the Proposed SDSU Mission Valley Campus Master Plan Project, County of San Diego, California. 26 pp.

Kus, B.E. 2020. Distribution and breeding status of Least Bell's Vireo along the San Diego and Tijuana Rivers in San Diego County, California (2020). U.S. Geological Survey data release, <https://doi.org/10.5066/P9WPPIQY>.

### Enclosure

- 1) **City of San Diego Subarea Plan (SAP):** The proposed Project occurs within the SAP Plan Area and is subject to its provisions and policies. To be considered a covered activity under the SAP, SDSU in coordination with the City needs to demonstrate that proposed actions are consistent with the SAP and the City's Implementing Agreement.
- 2) **Biological Resource Inventory:** The document should contain a complete description of the Project, including purpose and need, that describes all habitats within or adjacent to the Project area, all staging areas and access routes to the construction and staging areas. The Project area is described as the area in which potential effects may occur. The document should also provide a complete assessment of the flora and fauna within and adjacent to the Project area, with particular emphasis upon identifying endangered, threatened, sensitive, locally unique species, and sensitive habitats. Focused species-specific surveys, conducted at the appropriate time of year and time of day when the sensitive species are active or otherwise identifiable, should be conducted for all such species potentially impacted by the project. Acceptable species-specific survey procedures should conform with established protocol or be developed in consultation with the Wildlife Agencies.
- 3) **Analysis of Project Impacts:** To provide a thorough discussion of direct, indirect, and cumulative impacts expected to adversely affect biological resources, with specific measures to offset such impacts, the following should be addressed in the DEIR:
  - a) A discussion of potential adverse impacts to biological resources, including but not limited to, lighting, noise, human activity, edge effects, introduction of non-native species, habitat loss, fragmentation, and disruption of avian nesting and foraging behavior.
  - b) Discussions regarding indirect project impacts on biological resources, including resources in nearby public lands, open space, adjacent natural habitats, riparian ecosystems, and any designated and/or proposed or existing reserve lands (e.g., preserve lands associated with an NCCP). Impacts on, and maintenance of, wildlife corridor/movement areas, including access to undisturbed habitats in adjacent areas, should be fully evaluated in the DEIR.
  - c) A cumulative effects analysis should be developed as described under CEQA Guidelines, section 15130. General and specific plans, as well as past, present, and anticipated future projects, should be analyzed relative to their impacts on similar plant communities and wildlife habitats.
- 4) **Mitigation for Project-related Biological Impacts:** The DEIR should include mitigation measures for adverse project-related impacts to sensitive plants, animals, and habitats. Temporal loss of mature riparian corridors and the loss of function and value of a wildlife corridor should be considered. The DEIR should demonstrate how the proposed mitigation would meet the requirement of "no net loss" of habitat value. Mitigation measures should

emphasize avoidance and reduction of project impacts. 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 adequately mitigate the loss of biological functions and values, off-site mitigation through habitat creation and/or acquisition and preservation in perpetuity should be discussed.

- 5) **Nesting birds:** To avoid potential impacts to nesting birds in conformance with the California Fish and Game Code and Migratory Bird Treaty Act, the DEIR should require that clearing of vegetation and construction activities occur outside of the peak avian breeding season, which generally runs from February 1st through September 1st (as early as January 1st for some raptors). If Project activities cannot occur outside of the bird nesting season, the Wildlife Agencies recommend that nesting bird surveys be conducted no more than three days prior to construction-related activities, including clearing of vegetation, grubbing, or grading. If active nests or breeding behavior are observed within the Project area during the survey, a buffer zone with a minimum width of 100 feet (up to 500 feet for special-status species or raptors) should be established around the nest and a qualified biologist should be on-site to monitor activity daily during vegetation clearing and grading. Buffer zones should be delineated by temporary fencing and remain in effect as long as construction is occurring or until the nest is no longer active.

**The following comments are specific to CDFW:**

- 6) **City of San Diego Subarea Plan (SAP):** CDFW issued NCCP Approval and Take authorization for the City of San Diego SAP per section 2800, et seq., of the California Fish and Game Code on July 16, 1997. The SAP establishes a multiple species conservation program to minimize and mitigate habitat loss and provides for the incidental take of covered species in association with activities covered under the permit. Compliance with approved habitat plans, such as the SAP, is discussed in CEQA. Specifically, section 15125(d) of the CEQA Guidelines requires that the CEQA document discuss any inconsistencies between a proposed Project and applicable general plans and regional plans, including habitat conservation plans and natural community conservation plans. An assessment of the impacts to the SAP as a result of this Project is necessary to address CEQA requirements.
- 7) **Lake and Streambed Alteration Agreement:** CDFW 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, 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 CDFW pursuant to section 1600 *et seq.* of the Fish and Game Code. Based on this notification and other information, CDFW determines whether a Lake and Streambed Alteration Agreement (LSAA) with the applicant is required prior to conducting the proposed activities. Whether an LSAA is required to satisfy the requirements of Fish and Game Code section 1600 *et seq.* can only be determined at the time a formal notification package is submitted to CDFW. The NOP indicates that a formal jurisdictional delineation will be conducted, and that a Lake and Streambed Alteration Agreement may be required. We encourage SDSU to

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consult further with CDFW regarding the possible submittal of an LSAA Notification package and look forward to further coordination.

## MISSION VALLEY PLANNING GROUP

August 2, 2023

Paul Jackson, Program Manager  
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VIA EMAIL: [pjackson@sdsu.edu](mailto:pjackson@sdsu.edu)

Re: Fenton Parkway Bridge Project/ Notice of Preparation of an Initial Study and Draft Environmental Impact Report

Mr. Jackson:

Please accept this letter on behalf of the Mission Valley Planning Group in relation to the Notice of Preparation of an Initial Study and Draft Environmental Impact Report for the Fenton Parkway Bridge Project. The Mission Valley Planning Group voted on August 2, 2023 to support the initiation of the Notice of Preparation for the Fenton Parkway Bridge Project and looks forward to seeing the draft EIR in the coming months.

The Fenton Parkway Bridge Project has been a part of the Mission Valley Community Plan since at least the adoption of the 1985 Mission Valley Community Plan. As development has continued in the valley since the adoption of that plan, the North-South corridors across the river have remained a priority for effective circulation.

In 2019, the most recent Mission Valley Community Plan was adopted by a 9-0 vote of the San Diego City Council. The Community Plan recognizes the construction of the Fenton Parkway Bridge Project as one of three connections that that will improve access to the Green Line and great benefit pedestrian and bicycle connections (pg. 59).

The Notice of Preparation is the initiation of a long-awaited connection in Mission Valley. The Mission Valley Planning Group supports the steps taken by San Diego State University and looks forward to continued participation in the discussion with the University. Please do not hesitate to contact me at [MVPGChair1@gmail.com](mailto:MVPGChair1@gmail.com).

Sincerely,

Michele Addington  
Mission Valley Planning Group  
Chair  
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